

SAKARYA GAS FIELD DEVELOPMENT PROJECT

LIVELIHOOD RESTORATION PLAN

COMPANY Doc. No. SC26-OTC-PRJ-PM-PLN-000020

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DEFINITIONS

COMPANY	Turkish Petroleum - Offshore Technology Centre A.S. (TP-OTC)
CONSULTANT	WSP Mühendislik ve Danışmanlık Ltd. Şti. (WSP)
PROJECT	Sakarya Gas Field Development Project (SGFD)
PROJECT OWNER	TPAO
PROJECT EXECUTOR	TP-OTC

ABBREVIATIONS

Abbreviation	Definition
Aol	Area of Influence
BOTAS	Petroleum Pipeline Corporation
COLREG	Convention on the International Regulations for Preventing Collisions at Sea
CLO	Community Liaison Officer
EIA	Environmental Impact Assessment
EPCI	Engineering, Procurement, Construction and Installation
ESIA	Environmental and Social Impact Assessment
ETL	Energy Transmission Line
FMS	Fiscal Metering Station
FPU	Floating Production Unit
GHG	Green House Gas
GRM	Grievance Mechanism
HSSE	Health, Safety, Social and Environment
IFC	International Finance Corporation
LRP	Livelihood Restoration Plan
NAVTEX	Navigational Telex
OPF	Onshore Processing Facility
PAPs	Project Affected People
PIU	Project Implementation Unit
PS	Performance Standard
RA	Route Alternatives
SEP	Stakeholder Engagement Plan
SGFD	Sakarya Gas Field Development Project

SHOD	Office of Navigation, Hydrography, and Oceanography
SPS	Subsea Production System
SURF	Subsea Umbilical, Risers and Flow Lines
TPAO	Turkish Petroleum Corporation
TP-OTC	Turkish Petroleum Offshore Technology Centre

GLOSARRY

Associated Facility: Facilities that are essential to the construction or operation of an International Financial Corporation (IFC)-financed project but are not themselves financed by IFC. The IFC policy on involuntary resettlement may apply to resettlement induced by such facilities.

Amateur fishers¹ Refers to the fishing activities for sport fishing, made only for sport or recreation or for household consumption, and not for financial or commercial gain.

Economic Displacement Economic displacement refers to the loss of assets, resources, or access to resources that lead to a loss of income and livelihood. Economic displacement may result from Expropriation or restrictions on land use due to project-related requirements. Economic displacement does not necessarily go together with physical displacement.

Eligibility refers to criteria identifying which affected persons are entitled to receive compensation, resettlement assistance and/or other benefits as a result resettlement. Usually established either by law or via policies of International Financial Institutions (IFIs).

Land Expropriation: Process whereby a public authority, usually in return for compensation, requires a person, household, or community to relinquish rights to the land it occupies or otherwise uses.

Livelihood The range of means by which individuals, families and communities earn a living. Agriculture, bartering, fishing, foraging, natural resource-based livelihoods, petty trade, and wage-based income are included.

Livelihood Restoration Plan The livelihood restoration plan document is required for projects that only entail economic displacement. The Livelihood Restoration Plan sets out measures to restore and improve the effects of economic displacement on populations. Livelihood restoration and improvement are characterized by restored or improved income levels, household food security, the standard of housing, the security of tenure, household health and nutrition, income sources, access to infrastructure and services, access to markets, yields, food consumption and diet, resilience to natural or economic shocks.

Project-affected person (PAP) Any person who, because of the implementation of a project, is subjected to physical or economic displacement.² Such displacement adversely impacts the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.

Small-Scale Fisheries (SSF) Small-scale fishing is defined as daily fishing activities with boats smaller than 12 meters and passive fishing gear in areas close to the shore. This type of fishing activity is especially important for the welfare of coastal communities that make a living from fishing.

Stakeholders All individuals, groups, organizations, and institutions interested in or who are directly or indirectly affected by a project. People having the ability to influence a project are also considered to be stakeholders

Vulnerable Groups Individuals who could be more adversely affected by displacement than others and thus may be limited in their ability to claim or take advantage of resettlement assistance related development benefits. Factors that influence vulnerability include gender, ethnic origin, age, physical or mental disability, economic disadvantage, or social circumstances. Vulnerable groups in this context include the poorest among the poor, the landless, the elderly, households headed by women and children, ethnic minorities, communities that depend on natural resources. Displaced people not protected by national and international law are also considered vulnerable

¹ Amateur fishers are regulated by the Regulation on Offshore Fisheries for Amateur (Sports) Purpose Circular No. 37/2. Per the Circular, if there is species specific kilogram limitation as per the legislation, the amount of fish to be caught cannot be more than 5 kg.

² (International Finance Corporation, 2019, p. 270)

1.0 INTRODUCTION

This Livelihood Restoration Plan (LRP) for the Sakarya Gas Field Development Project (the Project) has been prepared i) to assess the livelihood restoration activities implemented since the construction of Phase 1 of the Project and ii) to identify the procedures and principles for the restoration of livelihoods that will be affected by the Project by examining the impacts on land and marine livelihoods in Phase 2 and to minimise these impacts.

An LRP was prepared and disclosed for the Phase 1 construction and operations activities (Document no: SC26-OTC-PRJ-PM-PLN-000005_R05). This updated LRP supersedes the previous document.

The scope of this LRP covers onshore and offshore areas which are being used and will be used temporarily and permanently by the Project during construction and operation phases of the Project including the operation of Energy Transmission Line (ETL) and marine usage restrictions.

The LRP identifies Project Affected People (PAPs), fishers affected by marine and restrictions on the fisher communities both during the construction activities in the onshore and offshore sections of the Project.

Data for the analysis of impacts on the PAPs and fishers, were obtained during the baseline studies conducted during the Phase 2 Environmental and Social Impact Assessment (ESIA) studies for the Project Phase 2 in August 2024.

2.0 PROJECT OVERVIEW

2.1 PROJECT DESCRIPTION

Turkish Petroleum Corporation (TPAO or Project Owner) has been established in order to perform hydrocarbon exploration, drilling, production, refinery and marketing activities on behalf of the Turkish Republic with the Law no 6327, in 1954.

On 12th March 2019, Turkish Petroleum Offshore Technology Centre (TP-OTC or Project Executor) was founded upon a Resolution of the Board of Directors of the main company TPAO. The name TP-OTC was registered on 2 April 2019 following this resolution, and the company was structured specifically for the conducting of maritime operations.

TP-OTC, 100% owned by TPAO will be conducting Project Management and Engineering, Procurement, Construction and Installation (EPCI) for the Sakarya Gas Field Development Project (SGFD Project or the Project) which has been initiated by the TPAO to extract, transport to shore and process the natural gas discovered in the Sakarya Gas Field, in the exclusive economic zone of Türkiye, off the Western Black Sea Region, and the natural gas reserves to be discovered through the ongoing exploration.

The SGFD phases are as follows:

Phase 1: Involves natural gas production with the subsea production system (SPS) from 10 wells in the Sakarya Gas Field. The gas is transported onshore through an approximately 170 km long, 16-inch (40.64 cm) diameter steel pipeline, processed at the Onshore Processing facility (OPF), and delivered to the Petroleum Pipeline Corporation (BOTAŞ) via the existing 36 km Western Black Sea Phase - 1 Pipeline. OPF has a daily production capacity of up to 10 million standard cubic meters (Sm³). The infrastructure for Phase 1, including the SPS, SURF (Subsea Umbilicals, Risers, and Flowlines), and OPF, has been installed. The first gas arrival onshore was achieved in 2023, with an initial production of 2.8 million Sm³/day. Currently, the production capacity has reached over 6 million Sm³/day.

Phase 2 (the Project): 13 additional wells are planned for the Sakarya Gas Field, with 2 connecting to the existing subsea production system and the remaining 11 linking to a new subsea production system to be installed and will be processed within a floating production unit (FPU). The gas from these wells will be transported to the OPF or processed in the FPU before being sent onshore via approximately 170 km, 16-inch steel pipeline to BOTAŞ. Phase 2 aims to boost total production capacity to 20.5 million Sm³/day, adding 10.5 million Sm³/day to the current capacity. The gas will be delivered to the national grid via the approximately 175 km Western Black Sea Phase - 2 Pipeline to be built and operated by BOTAŞ.

Phase 3: TP-OTC plans to continue natural gas production in the Sakarya Gas Field by drilling approximately 44 additional wells and processing the extracted gas using a new Floating Production Unit (FPU). This phase aims to bring the total number of wells to around 67 across all planned phases, with a projected maximum raw gas production capacity of 46.5 million Sm³/day. Currently in the design stage, Phase 3 is expected to commence in parallel to Phase 2 execution.

The present document deals with the livelihoods restoration implementations of Phase 1, and the Phase 2 of the Project.

Layout showing Sakarya Gas Field Development Project is presented below.

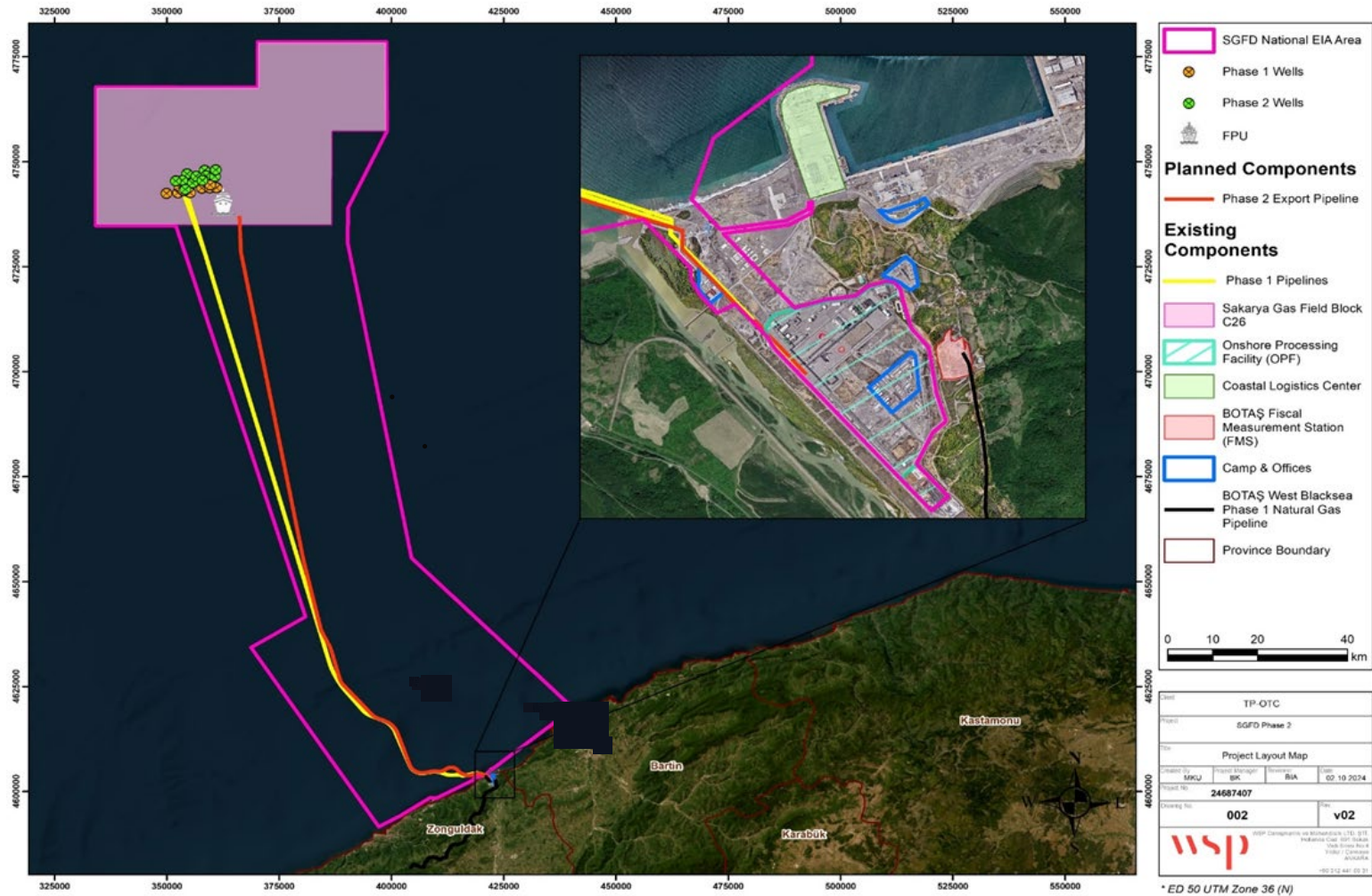


Figure 1: Sakarya Gas Field Development Project Phase 1 and Phase 2 Layout

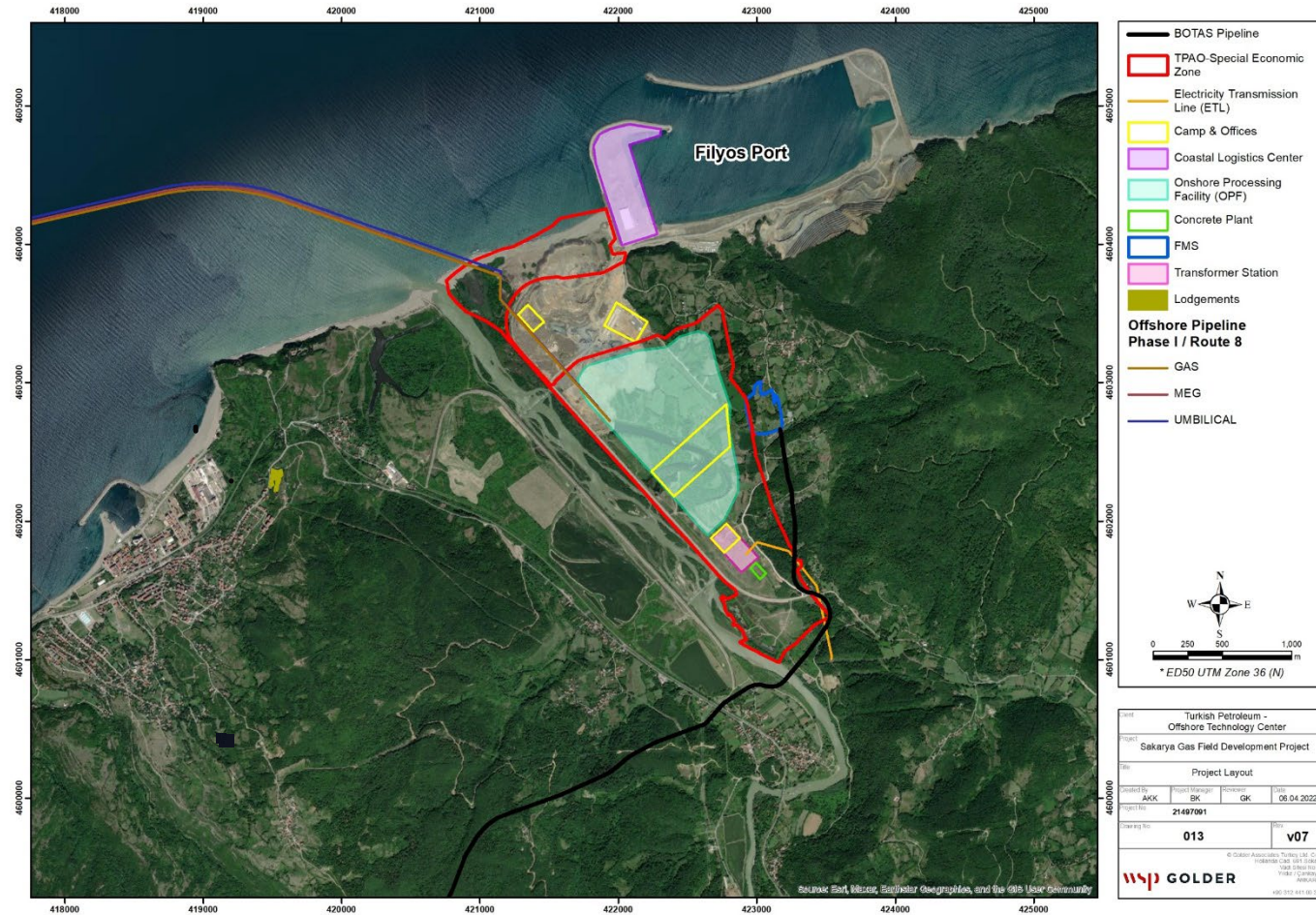


Figure 2: Sakarya Gas Field Development Project (drawing from Phase 1 ESIA), Energy Transmission Line (ETL) and Phase 1 Layout

2.2 PROJECT COMPONENTS

In addition to the existing structures built during Phase 1, Phase 2 will consist of four main units

- Subsea Production System (SPS),
- Subsea Umbilicals, Risers, and Flowlines (SURF),
- Floating Production Unit (FPU), and
- An export pipeline for the transportation of processed gas from the FPU to the onshore connecting to the tie-in point to the BOTAS onshore natural gas grid.

2.3 ENERGY TRANSMISSION LINE

The amount of electrical energy required for the Project was calculated as 9,000 kW(e) in Phase 1. There are 15kV 3 gas engines (2 in operation and 1 spare) each having a capacity of 4,500 kW(e) are used inside the facility to generate the necessary energy for the onshore facilities. These engines burn natural gas to generate electricity. The total thermal power of the 2 gas engines (operational ones) is 18.9 MW(t). Furthermore, the Project is connected to the national electrical grid through a substation (with 400 kV Overhead transmission line with a maximum of 1.3 km and GIS Switchyard. Transformer Station includes 400 kV Gas Insulated Switchgears, 400/15kV Transformers, MV Switchgear and related Control System. The national electrical grid is utilized as a backup power supply when the gas engines are not in use during a maintenance repair. Also, the emergency generators powered by diesel fuel are available inside the facility.

2.4 PROJECT ASSOCIATED FACILITIES

According to the IFC Performance Standards, Associated Facilities are defined as:

IFC – PS1 par. 8 – “Associated facilities, which are facilities that are not funded as part of the project and that would not have been constructed or expanded if the project did not exist and without which the project would not be viable”

Following processing at the FPU, the gas produced at the Sakarya Gas Field will be transported onshore via the export gas pipeline to the existing BOTAS tie-in point. This tie-in point is connected to the Fiscal Metering Station (FMS), where the gas is measured and offloaded to the national grid through a single pipeline. This pipeline, built and operated by BOTAS, includes the 36 km Western Black Sea Phase-1 Pipeline, completed in 2022 and the ~175 km connection (Western Black Sea Phase-2 Pipeline) which is currently under construction.

According to the IFC definitions, the pipeline is considered as Associated Facility to the main Project. The livelihoods impact of the BOTAS Pipeline is covered in two separate plans, i) LRP prepared for Western Black Sea Phase-1 Pipeline in 2022, ii) LRP being prepared for the Western Black Sea Phase-2 Pipeline as of the date of this plan.

The Western Black Sea Phase-1 and Phase-2 Pipelines have been evaluated through high-level Environmental and Social (E&S) Assessment Reports to identify key environmental and social risks. Based on these assessments, Management and Corrective Action Plans, including site-specific mitigation measures focused on the construction phase of each pipeline, have been developed. The Phase-1 E&S Assessment Report was included as an appendix to the Phase 1 ESIA, and the Phase-2 E&S Assessment Report was included as an appendix to the Phase 2 ESIA.

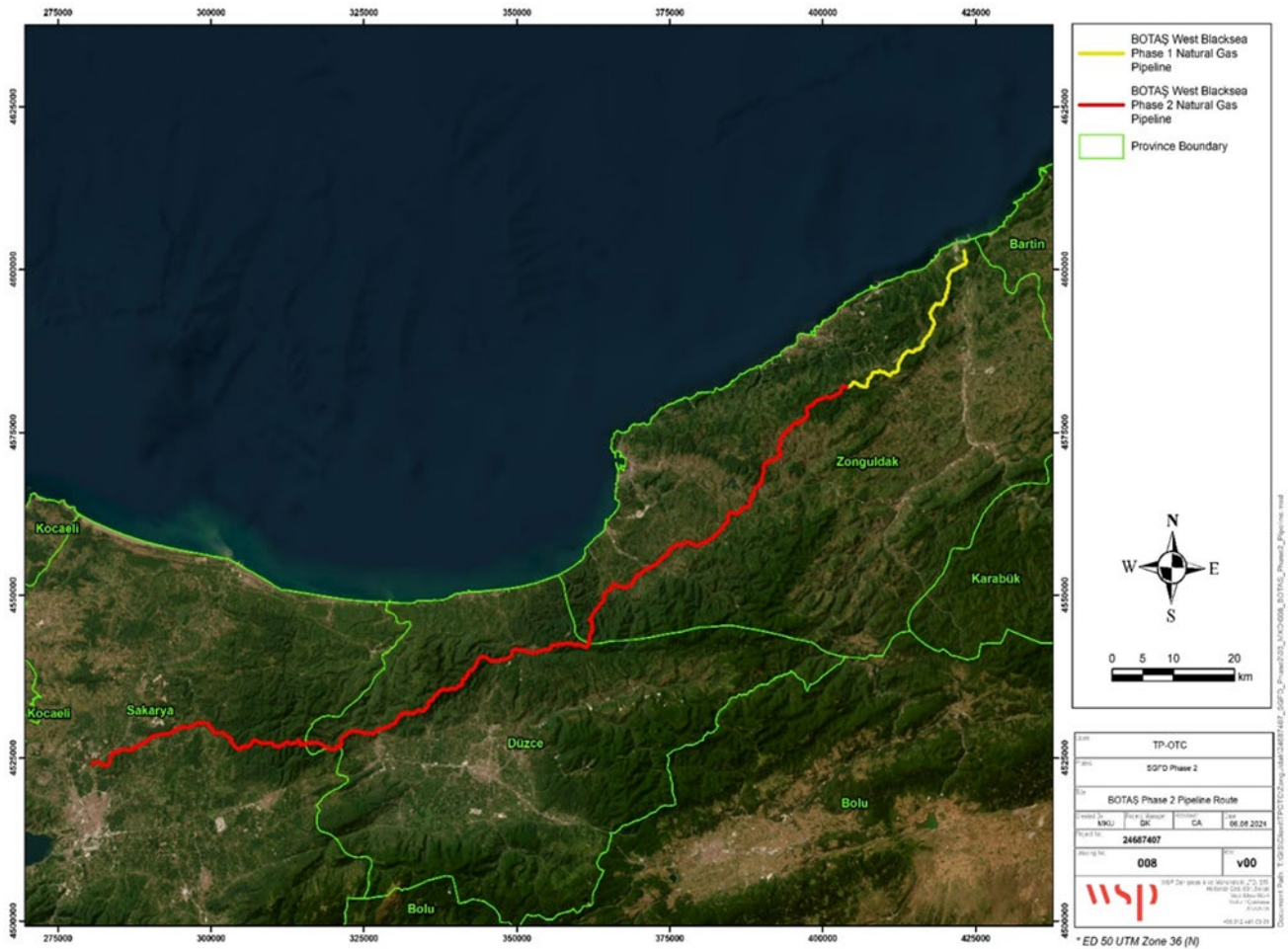


Figure 3: BOTAS - Western Black Sea Phase 1 and 2 Natural Gas Pipelines

2.5 ALTERNATIVE LOCATIONS OF PROJECT COMPONENTS

IFC PS1 requires full and detailed justification for any proposed alternatives through the environmental and social risks and impacts identification and assessment process.

Alternative locations of the Phase 1 components including the ETL are discussed In the Phase 1 ESIA and the LRP published in 2022.

In the following paragraphs, alternative locations considered for the export pipeline, FPU and the reasons that led to the choice of the designated locations over others are discussed.

Export Pipeline

The SGFD Phase 2 Project involves the construction of an offshore export pipeline to transport the processed natural gas from the Floating Production Unit (FPU) to onshore facilities. The Offshore Pipeline Routing Selection Report, prepared by SIA and Saipem on June 3, 2024. Two main route alternatives, Route Alternative 1 (RA-1) and Route Alternative 2 (RA-2), have been assessed for the escarpment and shallower sections of the Black Sea. The locations of the route alternatives, RA-1 and RA-2 are shown in Figure 4.

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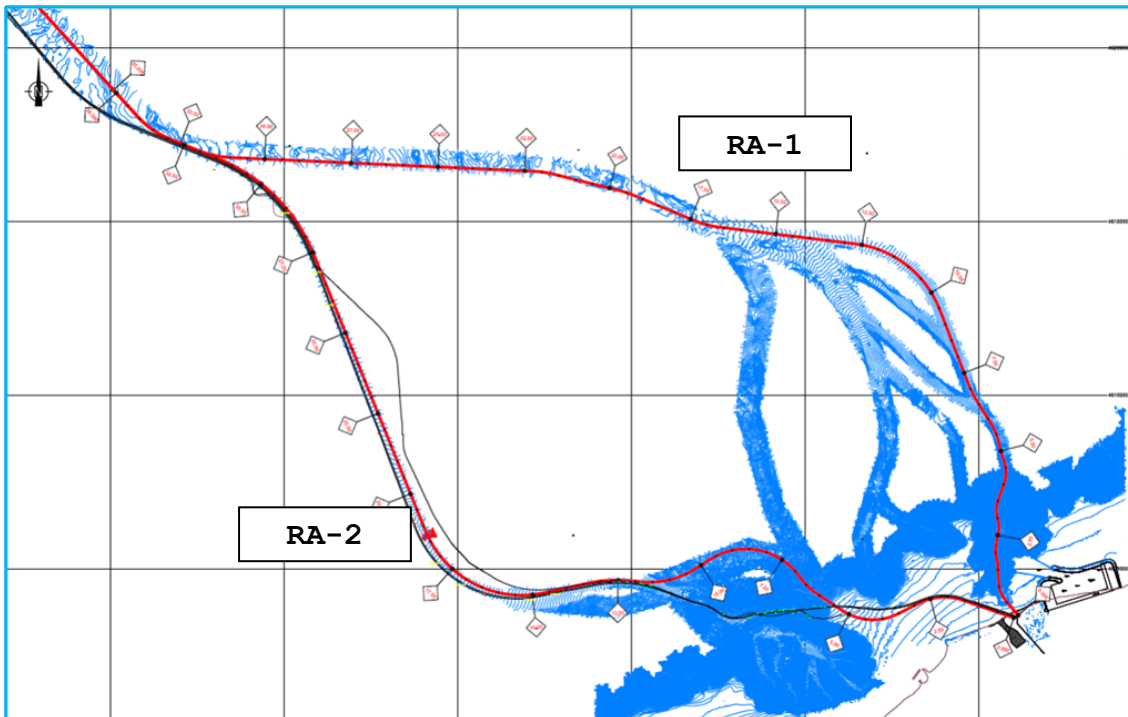


Figure 4 : Locations of Route Alternatives (RA-1 and RA-2) for the Export Pipeline

Geohazard risks, interface with Filyos River, interface with Filyos Port, shore approach and shallow water constructability, concrete and burial requirements, curve stability, free span correction, crossings and onshore section are the key considerations for selecting the export pipeline.

Main outcomes obtained from the assessments made:

- Routes have similar issues in terms of geohazards.
- Rock dumping pre and post lay are required on both routes.
- Excavation pre and post lay are required on both routes.
- RA-2 does not require lateral counteract but requires crossing preparation.
- RA-1 has more uncertainties on rock volumes due to stiff seabed and berm lateral slopes.
- RA-2 is considered favorable with respect to interaction with Filyos port and ship traffic, with no mitigation required.
- RA-2 has risks for interface with river.
- RA-2 has an additional shallow water scope not required on RA-1.

While RA-2 presents challenges related to river crossings and additional shallow water scope, these issues can be effectively addressed through careful planning, environmental safeguards, and community engagement. The route's favourable interaction with Filyos Port and ship traffic, combined with its lower uncertainties in rock volumes and geohazard management, offers a more stable foundation for environmental protection and resources management and minimizes social impacts. Therefore, RA-2 is the preferable option for the SGFD Phase 2 export pipeline.

Floating Production Unit

The position of the Floating Production Unit (FPU) has been selected within the Sakarya Gas Field, as illustrated in Figure 5.

In evaluating options for gas processing in Phase 2 of the SGFD, the decision was made to utilize an FPU, rather than expanding the capacity of the existing OPF constructed in Phase 1. While the OPF at Filyos base has sufficient space to expand and process the additional gas, the FPU approach reduces back-pressure and enhances reservoir recovery.

The choice of the FPU is primarily driven by its ability to enhance production efficiency and recovery rates. One of the significant advantages of the FPU is its capability to reduce downhole abandonment pressures to lower levels. FPU contributes to a higher gas recovery factor in the field, maximizing the extraction of hydrocarbons and optimizing overall field production.

An essential operational benefit of the FPU is its ability to separate water on-site. This feature eliminates the need to pump produced water 170 kilometres to shore, significantly reducing logistical challenges and operational costs. Additionally, the FPU reduces the length of the MEG and umbilical lines needed, further minimizing construction and maintenance requirements. This not only reduces logistical and operational costs but also mitigates environmental impacts associated with long-distance water transport. Shorter pipelines also decrease the energy consumption associated with pumping, leading to lower greenhouse gas (GHG) emissions during operations. By processing the gas offshore, the Project avoids the environmental risks linked to extensive pipeline networks and reduces the likelihood of spills or leaks that can occur during transportation. Furthermore, the reduction in infrastructure needs not only minimizes physical disturbances to marine and coastal ecosystems but also aligns with sustainability goals by lowering overall emissions associated with construction and operation.

The FPU's proximity to existing Phase 1 subsea infrastructure is another critical consideration. This close location reduces future complexities related to integrating Phase 1 wells with the Phase 2 infrastructure and the FPU, streamlining operations and minimizing the need for additional installations.

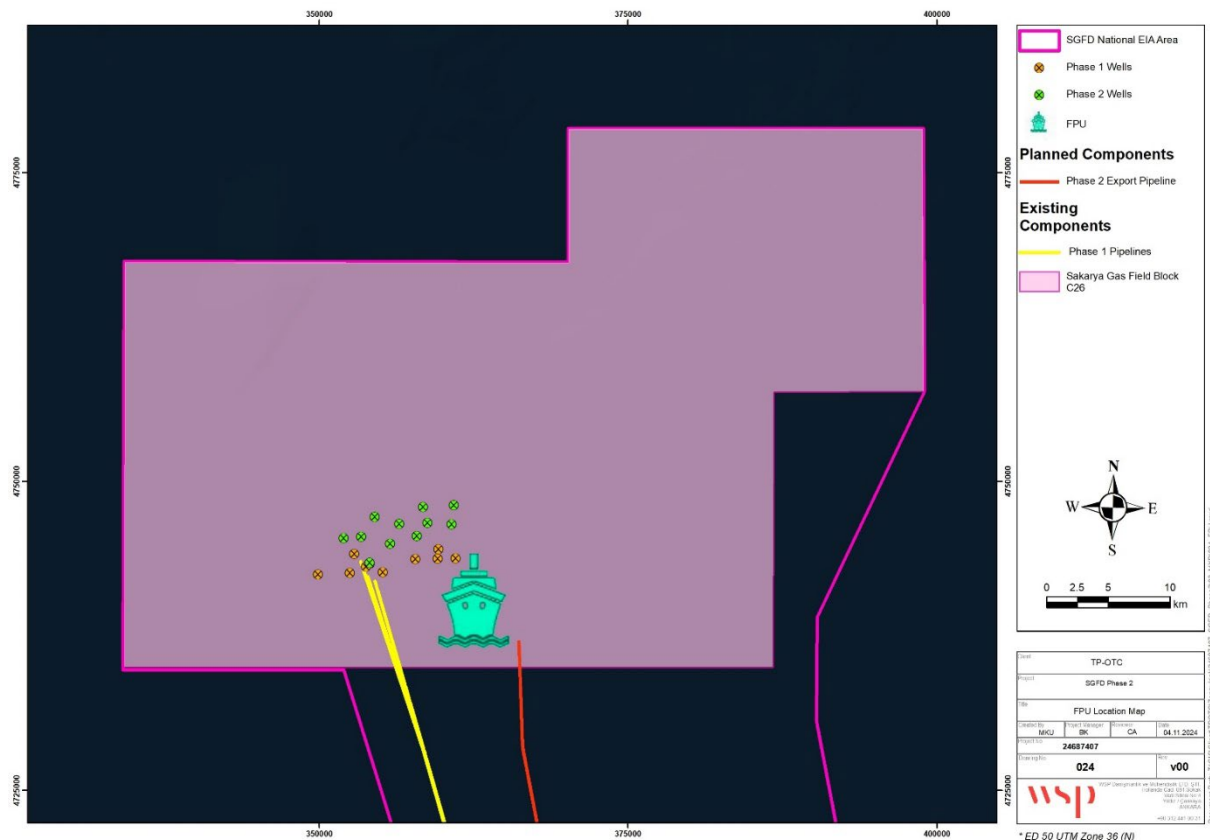


Figure 5: Selected Location of FPU

Onshore facilities

The site alternatives for the onshore facilities were assessed in the SGFD Phase 1 ESIA, which concluded that the Filyos site was optimal due to its proximity to the Sakarya Gas Field, logistical

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advantages, minimal environmental impact, and reduced construction and operational costs. Since the onshore facilities are already constructed and operational, and the Phase 2 will be connected to the existing facilities further assessment of site alternatives for the onshore facilities in this Phase 2 ESIA Report was not deemed necessary.

3.0 LIVELIHOOD RESTORATION CONTEXT

3.1 Onshore Context (Energy Transmission Line)

Project has been connected to the national electrical grid during Phase 1 construction, through a substation (with 400 kV Overhead transmission line with a maximum of 1.3 km and GIS Switchyard. Transformer Station includes 400 kV Gas Insulated Switchgears, 400/15kV Transformers, MV Switchgear and related Control System.

According to information obtained from Turkish Electricity Transmission Corporation (TEİAŞ) 29 parcels were affected from the construction of ETL consisting of 8 private parcels and 21 government owned lands. As a normal legal process agricultural land is expropriated, and non-agricultural land use permit is obtained from the Provincial Directorate of Agriculture and Forestry if required. Forest land is allocated after the permission to be obtained from the Provincial Directorate of Agriculture and Forestry.

Damage to land and trees, 126,616.00 TL has been paid by Güngör Elektrik, to 4 land owners and the village legal entity. These are the land owners impacted during the construction. The payments were done on 12.10.2022 (3 land owners and the village legal entity) and 10.12.2022 (one land owner). The compensation process (expropriation) for the ETL started in June 2023 and continues. These compensations will be paid by TEİAŞ.

Expropriation works have not been completed as the agreement process and unit price objections continue.

On 11/03/2024, Güngör Elektrik sent a letter to the 5th Regional Directorate of TEİAŞ General Directorate within the scope of the individual investment location zoning plan. According to the new zoning plan, the boundaries of some parcels have changed and new owners subject to expropriation have emerged. Güngör Elektrik has initiated expropriation procedures according to the new parcel boundaries with this letter. The expropriation process continues with the bases received from the Cadastral Directorate. The letter regarding the process is as follows.



Sayı : 2024/0418
Konu : 400kV 2x3B.1272 MCM (Bartın OSB-ZETES 3) Brş.N.
Karadeniz DG GIS TM EIİH
Onaylanan Kamulaştırma dosyası hk.

11 Mart 2024

TEİAŞ GENEL MÜDÜRLÜĞÜ
5.BÖLGE MÜDÜRLÜĞÜ
ADAPAZARI

İlgi : 20.04.2022 tarih, 4798657 sayılı Zonguldak Kadastro Müdürlüğünün,
Bölge Müdürlüğüne muhatap yazısı

Genel Müdürlüğünüz ile Türkiye Petrolleri Anonim Ortaklığı arasında 10.12.2021 tarihinde imzalanan Bağlantı Anlaşması kapsamında tarafımızca tesis edilen; "400kV (Bartın OSB-ZETES 3) Brş.N. Karadeniz DG GIS TM EIİH"na ait kamulaştırma dosyaları tarafımızca hazırlanarak, kontrolunuzdan sonra ilgili Kadastro Müdürlüğüne gönderildi ve Zonguldak Kadastro Müdürlüğünün ilgi yazısı (Ek-1) ile kontrolleri tamamlanıp onaylanarak, kamulaştırma işlemlerinin yapılması için sevk edilmiştir.

Ancak bu kontrol süreci tamamlandıktan sonra, TPAO tarafından aynı bölgede yaptırılan "Münferit Yatırım Yeri İmar Paftası" çalışması nedeniyle Enerji İletim Hattı güzergahındaki bazı parsellerin sınırları değişerek yeni parseller dolayısı ile yeni malkler oluşmuştur.

TPAO tarafından söz konusu parsellerde yapılan yeni düzenlemelerden sonra Çaycuma Kadastro biriminden alınan altlıklar ve yeni tapu kayıt belgeleri doğrultusunda revize / yeniden hazırlanan Kamulaştırma dosyası ekte sunulmaktadır.

Gereğini bilgilerinize arz ederiz

Saygılarımızla



GÜNGÖR ELEKTRİK
Sanayi ve Tic. Ltd. Şti.
S. H. AYDINLI
Şirket Müdürü

EKLER :

- 1- İlgi Yazı fotokopisi.....1 syf
- 2- Kamulaştırma Dosyası..... 1 adet
- 3- Rulo Plan..... 3 adet
- 4- CD (Kamulaştırma)..... 2 adet

BİLGİ :

- TURKISH PETROLEUM OFFSHORE TECHNOLOGY CENTER A.Ş. (Eksiz)



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Figure 6: Letter regarding the ETL

According to the current data provided by TEİAŞ, the latest status of the expropriation files is given below.

Status of the private parcels in Aşağıhsaniye village;

- For 106 plot 21 parcel, since BOTAŞ did not give consent, the file with the science record number 2024/1846 was returned with the letter numbered 14382467.
- Since BOTAŞ did not grant consent for the parcel numbered 111 plot 5, the file with the science record number 2024/1863 was returned with the letter numbered 14382467. The parcel in question is subject to expropriation due to BOTAŞ natural gas pipeline and the ETL.
- For 122 Plot No. 3, when the overseas notifications are completed, a Registration Case will be filed,
- Registration of 122 plot 2 parcel has been completed,
- Article 10 Identification and Registration Case was filed for 122 Plot 4 with the letter dated 04.11.2024 and numbered 2756320,
- For 119 plot 25 parcel, an Article 10 Identification and Registration Case was filed with the letter dated 09.12.2024 and numbered 2821152.
- With the letter dated 02.12.2024 and numbered 2808539, the expropriation documents of the parcels belonging to the Treasury of Finance were sent to the Zonguldak Provincial Directorate of Environment, Urbanisation and Climate Change with parcels numbered 113, 2, 3 and 9 and parcels numbered 136, 3 and 4 in Aşağıhsaniye village.

Status of the state owned land;

- The expropriation documents of the parcels of 119 plot 13 parcel, 122 plot 6 parcel and 144 plot 2 parcels of Aşağıhsaniye village owned by the Treasury of Finance were sent to Zonguldak Provincial Directorate of Environment, Urbanisation and Climate Change with the letter dated 06.12.2024 and numbered 2818691.
- Expropriation documents of the parcels owned by the Treasury of Finance were sent to Zonguldak Provincial Directorate of Environment, Urbanisation and Climate Change with the letter dated 06.12.2024 and numbered 2818691 for 127 plot 2 parcel in Sazköy village and 140 plot 2 parcel in Aşağıhsaniye village.

3.2 Offshore Context

When compared to other regions of the Black Sea, the Western Black Sea region is found to be lacking in aquaculture and related activities. Fishing, particularly anchovy fishing, holds significant potential in the coastal provinces of Zonguldak and Bartın. However, this potential for high income is not fully realized due to inadequate infrastructure, such as the lack of cold storage facilities and sorting areas for the fishers. Additionally, the absence of fully equipped fish markets within municipal boundaries, weaknesses in organizational structures, and insufficient marketing strategies lead to substantial economic losses. As a result, the fishing output in the region has not shown significant growth over the years.

The fishing industry in Filyos does not have a long-established history. Before the 1980s and even today, there has been no significant presence of an industrial-scale fishing sector in the region.

According to a 2021 report by the Ministry of Agriculture and Forestry's Directorate of Aquaculture Central Research Institute of Trabzon, fishing is less developed in Zonguldak compared to other Black Sea provinces, and the fishing industry in Filyos has remained stagnant for many years. Interviews with local fishers indicate that the project area is utilized by Filyos fishers for most of the year.

4.0 LEGAL AND INSTITUTIONAL FRAMEWORK

The LRP will comply with all applicable national legislation and will apply relevant World Bank Operational Policies 4.12, IFC Performance Standard 5 and guidelines and international best practices for the management of impacts on livelihoods of Project affected communities.

4.1 NATIONAL LEGISLATION

The main national legislation related with the land acquisition and fisheries and marine ecosystems in Türkiye are summarized in Table 1 and Table 2 below.

Table 1: National Legal Framework for Land Acquisition

Related Legal Requirement	Topic	Remark
Constitution of the Republic of Türkiye	Expropriation requirement	The Constitution states that the compensation value and the decreed increased value will be paid in full and in cash to the owners.
		<p>There are no direct constitutional principles for resettlement in Türkiye. However, Articles 44 and 45 of the Constitution indirectly relate to resettlement activities.</p> <ul style="list-style-type: none"> • Article 44 addresses land ownership and stipulates the responsibility of the government to protect the landless and those with inadequate land. • Article 45 describes the responsibility of the government to support those working on agricultural and stockbreeding

Related Legal Requirement	Topic	Remark
		<p>activities. Article 56 reaffirms the right of all to live in a healthy environment.</p> <p>Article 46 addresses expropriation concepts:</p> <ul style="list-style-type: none"> • State and public entities; In cases where the public interest requires it, it is authorized to expropriate privately owned immovable properties in whole or in part, and to establish administrative servitude on them, following the principles and procedures prescribed by law, provided that the actual compensation is paid in advance. • The expropriation price and the final decision are paid in cash and in advance. However, the implementation of the agricultural reform, the realization of large energy and irrigation projects and resettlement projects, the cultivation of new forests, the protection of the coasts, and the payment method for the expropriated lands for tourism purposes are indicated by law. In such cases where the law may require payment in instalments, the instalment period cannot exceed five years; In this case, the instalments are paid equally. • The cost of those belonging to the small farmer who directly manages that land from the expropriated land is always paid in advance without instalment. • In the instalments envisaged in the second paragraph and the expropriation prices not paid for any reason, the highest interest foreseen for public receivables is applied.
Expropriation Law (Law No: 2942), as amended in 2020	Procedures for expropriation of immovable property	<ul style="list-style-type: none"> • Sets out the procedures for expropriation of immovable property in possession of natural and private legal entities by the state and public legal entities in circumstances where the public interest requires, as well as procedures and methods for calculation and payment of the expropriation price, notifications, negotiations, registration of the immovable property and the right of way in the name of the authority, and settlement of related disputes. • Land Expropriation Law forces that where expropriation is inevitable, the expropriation price must be paid to the landowner before land entry. Moreover, the owner and occupant of the immovable property subject to expropriation and other concerned parties has the right to object Expropriation process, the project itself or the price offered to them.
	Land Requirement	<ul style="list-style-type: none"> • Article-3: The administrations shall obtain the immovable properties, resources and easement rights required to execute public services or enterprises that they are obliged to do by laws and Presidential decrees; They can make expropriation by paying the costs in cash and in advance in equal instalments.
	Determination of the affected land	<ul style="list-style-type: none"> • Article-7: The administration that is responsible for the expropriation will identify the land owners and land users by using large-scale plan and each user/owner will be identified by using the documents such as title deed and/or the addresses, tax and population records.

Related Legal Requirement	Topic	Remark
	Land Purchase (Settlement Agreement?)	<ul style="list-style-type: none"> Article-8: According to this law, the administrations will make it essential to apply the procurement procedure first in expropriation.
	Expropriation	<ul style="list-style-type: none"> Article-10: If the procurement procedure cannot carry out the expropriation, the administration shall apply to the first degree court where the immovable property is located by adding the information and documents it has collected in accordance with Article 7 and the other information and documents to a petition and to determine the expropriation value of the immovable property. This price is paid in cash or instalments if the expropriation is made in accordance with the second paragraph of Article 3.
	Land Valuation	<ul style="list-style-type: none"> Article-11: a) Land type, b) Size of the land. c) All the qualities and elements that can affect its value and the value of each element separately, d) Tax declaration, if any, e) Appraisal made by the official authorities at the date of expropriation, f) Land, immovable property or resource and its net income g) The sales value of the lands according to the precedent sales without a special purpose, h) The depreciation of the structures, i) Other objective measures that will be effective in determining the price,
	Court process	<ul style="list-style-type: none"> Within thirty days from the date of notification made by the court by the owner of the immovable property subject to expropriation in accordance with Article 10, the court's announcement with the newspaper to replace the notification to those who cannot be notified, a lawsuit can be filed for an annulment in the administrative jurisdiction against the expropriation process and for correction in the judicial jurisdiction.
	Urgent Expropriation	<ul style="list-style-type: none"> The Expropriation Law (Article 27) states that, subject to a Council of Ministers Decree for national defence or in case of emergency, any immovable property may be expropriated by the administration undertaking expropriation for public interest. To apply the emergency clause of the law and to urgently acquire land through this mechanism, the value of the immovable property and asset (crop values are determined and paid before land entry) in question must be appraised by the Valuation Commission (established within the expropriation agency consist of relevant discipline experts) according to the Article 11 of the Expropriation Law within seven days. The expropriation shall be made after the total appraised value of the immovable is deposited by the administration in the owner's name. Article 27 of the law allows the expropriation body to enter the field earlier than the timing of entry under the standard expropriation procedures. Still, the article does not limit the owner's claims on the valuation of land and fixed assets. The valuation process is done by the court or court nominated experts within one week. This article will only be used when other avenues have failed.

Related Legal Requirement	Topic	Remark
Forest Law (1956, No. 6831)	Compensation of Forest Lands	<ul style="list-style-type: none"> The law was enacted in 1956 and amended in 2003, 2004, 2013 and 2020. Under the Forest Law, those responsible for implementing the Project must obtain permission from the Ministry of Agriculture and Forestry to perform activities in forests or lands classified as forest and are required to indemnify damages to public forests resulting from the construction of the Project. According to the law, the Ministry has the authority to permit the use of forest land (49-year lease periods). In addition to the law itself, the regulation on "Permits to be Given on Land Considered Forest Areas" (Official Gazette dated 22 March 2007, Law No: 26470) settles the methods and principles of the approvals, permits and easement rights to be given. Another addition to the regulation regarding the implementation of Article 16 of the Forestry Law published in the Official Gazette numbered 28976 and dated 18 April 2014 stipulates the implementation of Article 17/3 and 18 of the Forest Law. Article 9 of this regulation redefines the fees and the calculation of the fees to be collected from other authorities utilising forest land.
Pasture Law (1998, No. 4342)	Compensation of Pasture Lands	<ul style="list-style-type: none"> This law was enacted in 1998, and amended in 2004, 2008 and 2013. The acquisition of pasture lands is identified as being public common land. The area crossed by the Project will be separated in the title deed. Its status will be changed from 'pasture' designation to treasury land. No further action will be required. Neither the public's right nor the specific users of pastures are recognised under the law for compensation. Available payment under local laws is made for grass. Therefore, Turkish legislation cannot compensate PAPs' pasture and meadow losses and associated income losses.
Cadastral Law (1987, No. 3402)	Determination of the legal status and boundary of the land	<ul style="list-style-type: none"> The Cadastral Law determines the boundaries and legal status of immovable assets based on the national coordinate system and the cadastral or the topographic cadastral maps to register land and constitute the basis of the spatial information system as the Civil Law (No. 4721) stipulates. The Cadastral Law also defines the process for identifying landowners without registered title deeds or where there is a dispute over land ownership.
Land Registry Law (1934, No. 2644)	Land title	<ul style="list-style-type: none"> The law was enacted in 1934 and amended numerous times between 1934 and the present. Land Registry Law (No. 2644) is the main land title regulation. Land registration in Türkiye is based on the Cadastral Law (No. 3402). Land Registry Law also states that citizens can rent treasury lands for agricultural, commercial, sports and social activities.
Agricultural Reform Law on Land Arrangement in	Land consolidation and allocation	<ul style="list-style-type: none"> The law was enacted in 1984 and amended in 2001 and 2014. The law covers matters regarding land consolidation and allocation of land for purposes other than agriculture when this is needed. It is stipulated in the law that in areas where

Related Legal Requirement	Topic	Remark
Irrigated Areas (1984, No. 3083)		agricultural production is no longer economically viable due to fragmentation, land consolidation will be undertaken to prevent fragmentation or a reduction in the spatial extent of agricultural land, that would result in it not being sufficient to provide a household's livelihood, and make use of the household workforce.
Law on Soil Protection and Land Use (2005, No. 5403)	Protection of the agricultural lands	<ul style="list-style-type: none"> The law was enacted in 2005 and amended in 2008 and 2014. It sets out the principles for agricultural lands to be improved, protected against misuse, properly categorised and to prevent fragmentation.
Notification Law	Notification of landowners and land users	<ul style="list-style-type: none"> With its amendments in 2003, 2008 and 2011, the law provides the basis for a notification process for property owners. It consists of specific procedures to reach a range of public and private owners, including those whose addresses are unknown. According to the law, notification provisions include sending letters to registered addresses, seeking support from local authorities, publication through an advertisement placed in a national newspaper and published throughout the country in significant numbers, and electronic communications. The law provides guidance for communicating with different categories of stakeholders, including resident owners, absentee owners, owners outside Türkiye, and various public agencies. The Notification Law details the notification process for landowners and land users whose address is unknown, as determined by the Notification Officer. According to the modifications made in the law in 2011 (Article 10), the notification can be made wherever appropriate for the affected owner and to the last address known. If the person cannot be reached, notification is sent to the last known residence and is directed to the village or municipal quarter headmen. Upon receipt of notification, the owners have the right to apply to those responsible for implementing a Project for a negotiated settlement. Should the owner reside in a foreign country, a registered mail is sent to the last known address. The expropriation agency can also seek the support of consulates to reach owners.
Land Registry Code (2013, No. 28738)	Land registry records	<ul style="list-style-type: none"> This Code aims to keep the land registry records in order with respect to the Civil Law (No. 4721). It comprises the principles and procedures about ownership, limited real and individual rights of immovable assets, and their entry, amendment, cancellation, and rectification to the land registry. Articles 24 and 25 of this Code protect the rights of the illiterate, disabled and non-Turkish speaking right holders.

Table 2: National Legal Framework for Fisheries

Related Legal Requirement	Topic	Remark
The Fisheries Law (Law No: 1380/ 3rd March 1971):	Fishery	<ul style="list-style-type: none"> • Fisheries Law No. 1380 of 1971, as amended by Laws No. 3288 of 1986 and No. 4950 of 2003, is the framework law for fisheries and aquaculture related activities. The law provides the basis for the regulations and communiqués, issued under the authority of the competent minister (the minister of Food Agriculture and Livestock), which are used to regulate fisheries and aquaculture. All activities in fisheries and aquaculture are based on the Fisheries Law, No.1380 of 1971. With this law, and its related regulations, definitions were codified. Based on this law, regulations and notifications are prepared to regulate fisheries. Law No. 3288 of 1986 amended the Fisheries Law No.1380 of 1971. According to Laws 1380 and 3288, and Continental Waters Law No. 2674 of 1982, foreigners are not allowed to participate in commercial fishing activities. Article 1 of the Law explains the scope of the Act – “protection, production and inspection of aquatic products” – and Article 2 gives the definitions, including the aquatic products, which are further completed by other regulations. Fisheries Law No. 1380 sets out rules for: <ul style="list-style-type: none"> ○ Management of fisheries and aquaculture. ○ Fisheries and aquaculture activities. ○ Improvement, incentives and protection. ○ Prohibitions. ○ Fish markets. ○ Procedural provisions. ○ Inspection and control. ○ Penal clauses. • A separate critique of the draft amendment to the fisheries law was prepared and submitted to the Prime Minister’s Office (2008) but in summary there are issues with the current law which compel a recommendation that the law be re-drafted and that a new law is made to deal specifically with aquaculture.
Aquaculture Regulation No. 25507. 29 Jun 2004	Aquaculture	<ul style="list-style-type: none"> • The objective of this Regulation is to ensure planned investments on fishery for a more efficient exploitation of water resources, fishery activities sustainability, environmental protection and certified fish products quality. Conditions for the setting up of fishery facilities in inland waters are detailed, including the minimum distance between two facilities, minimum water surface area requirements for dam, lakes, ponds and other inland waters, use of net cages, off-shore production, etc. Individuals and companies involved in fish production should apply to the Ministry of Agriculture and Rural Affairs. Procedures and required documentation are given in details. A preliminary concession is granted to individuals and companies for a period of twelve months, allowing them to prepare their detailed project. These projects are then submitted to the Ministry of Agriculture and Rural Affairs for ratification. Corresponding provisions of Environmental Impact Assessment should be observed during ratification process. Fishery Producers Certificate

Related Legal Requirement	Topic	Remark
		should be obtained by the producers from the Provincial Directorate of Agriculture when facilities are completed. This certificate is prepared for each production facility and is subject to visa every three years. Revocation procedures and circumstances are given in the regulation. Importation of eggs, fries, and breeders are subject to consent by the Ministry of Agriculture and Rural Affairs. Procedures and required documents are given in details. Inspection details for the production facilities are also given in the regulation.
The Regulation on Fisheries (Published in the official gazette on 10th March 1995):	Fisheries	<ul style="list-style-type: none"> As stated in Article 4, the duration of license certificates for legal entities and fishing vessels is two years, and the duration of license certificates for real persons is five years. Article 13 stipulates that the vessels with a length of less than 12 meters may hold fishing gear such as beam trawl, shrimp trawlers and harpoons
Decision Concerning Agricultural Supporting Materials for 2012 (Decision No:2012/3106):	Fisheries	<ul style="list-style-type: none"> According to Article 4, in order to protect and sustainable operation of the aquatic resources and to reduce the fishing pressure on stocks, the vessel owners with aquaculture authorization certificate who have vessels of twelve meters and over are paid an amount according to the ship's length in support of the withdraw of the vessels from the fishing. shrimp catching. According to Article 18, Sardinian catching with extension nets is free throughout the period. As stated in Article 19, in all territorial waters, from 1 April to 31 August, catching bonito is prohibited with any kind of fishing gear.
Subsidy Notification Implementing Those Withdrawn Their Vessels from Fishing (Communique No: 2016/40):	Fishing Vessels	<ul style="list-style-type: none"> As stated in Article 1, the purpose of this communiqué is to provide the procedures for works and operations related to the support of the ship-owners who intentionally sold the fishing vessels ten meters or more in order to protect the stocks, reduce the fishing pressure and ensure sustainable fishery in accordance with the Decision of the Agricultural Supports to be made in 2016 put into effect by the Decision of the Council of Ministers. Article 4 stipulates that the vessels registered in Fishery Products Information System (SUBIS) with a length of ten meters or more, which are licensed by the Ministry of Food, Agriculture and Livestock and to be engaged in fishing activities in the seas and which are still valid, are in the scope of support.
Decision Concerning Agricultural Supporting Materials for 2012 (Decision No:2012/3106)	Fishing Materials	<ul style="list-style-type: none"> According to Article 4, in order to protect and sustainable operation of the aquatic resources and to reduce the fishing pressure on stocks, the vessel owners with aquaculture authorization certificate who have vessels of twelve meters and over are paid an amount according to the ship's length in support of the withdraw of the vessels from the fishing. Subsidy Notification Implementing Those Withdrawn Their Vessels From Fishing.

4.2 INTERNATIONAL STANDARDS

IFC Performance Standard-5

This Performance Standard applies to physical and economic displacement resulting from the following types of land-related transactions:

- Land rights or land use rights acquired through expropriation or other compulsory procedures following the host country's legal system.
- Land rights or land use rights acquired through negotiated settlements with property owners or those with legal rights to the land if failure to settle would have resulted in expropriation or other compulsory procedures.
- Project situations where involuntary restrictions on land use and access to natural resources cause a community or groups within a community to lose access to resource usage where they have traditional or recognisable usage rights.
- Certain project situations requiring evictions of people occupying land without formal, traditional, or recognisable usage rights.
- Restriction on access to land or use of other resources, including communal property and natural resources such as marine and aquatic resources, timber and non-timber forest products, freshwater, medicinal plants, hunting and gathering grounds and grazing and cropping areas.

Relevant PS5 aspects are highlighted in Table 3.

Table 3: IFC Performance Standard- 5

Related PS5 Paragraph	Topic	Remark
8	Project design	<ul style="list-style-type: none"> • The client will consider feasible alternative project designs to avoid or minimise physical and economic displacement, while balancing environmental, social, and financial costs and benefits, paying particular attention to impacts on the poor and vulnerable.
9	Compensation and benefits for displaced persons	<ul style="list-style-type: none"> • When displacement cannot be avoided, the client will offer displaced communities and persons compensation for loss of assets at full replacement cost and other assistance to help them improve or restore their living standards or livelihoods, as provided in this Performance Standard. Compensation standards will be transparent and applied consistently to all communities and persons affected by the displacement. Where livelihoods of displaced persons are land-based, or where land is collectively owned, the client will, where feasible, offer the displaced land-based compensation. The client will take possession of acquired land and related assets only after compensation has been made available and, where applicable, resettlement sites and moving allowances have been provided to the displaced persons in addition to compensation. The client will also provide displaced communities and persons with opportunities to derive appropriate development benefits from the project.
10	Community engagement	<ul style="list-style-type: none"> • The client will engage with affected communities, including host communities, through the process of stakeholder engagement described in Performance Standard 1. Decision-making processes related to resettlement and livelihood restoration should include options and alternatives, where applicable. Disclosure of relevant information and

Related PS5 Paragraph	Topic	Remark
		participation of affected communities and persons will continue during the planning, implementation, monitoring, and evaluation of compensation payments, livelihood restoration activities, and resettlement to achieve outcomes that are consistent with the objectives of this Performance Standard. Additional provisions apply to consultations with Indigenous Peoples, following Performance Standard 7.
11	Grievance mechanism	<ul style="list-style-type: none"> The client will establish a grievance mechanism consistent with Performance Standard 1 as early as possible in the project development phase. This mechanism will allow the client to receive and address specific concerns about compensation and relocation raised by displaced persons or members of host communities in a timely fashion, including a recourse mechanism designed to resolve disputes impartially.
12-16	Resettlement and livelihood restoration planning and implementation	<ul style="list-style-type: none"> Implementation of a RAP or livelihood restoration plan (LRP) will be considered completed when the adverse impacts of resettlement have been addressed in a manner consistent with the relevant plan and the objectives of this Performance Standard. It may be necessary for the client to commission an external completion audit of the RAP or LRP to assess whether the provisions have been met, depending on the scale and complexity of physical and economic displacement associated with a project.
19-24	Physical displacement	<ul style="list-style-type: none"> In the case of physical displacement, the client will develop a RAP that covers, at a minimum, the applicable requirements of this Performance Standard regardless of the number of people affected. This RAP will include compensation at full replacement cost for land and other assets lost. The plan will be designed to mitigate the negative impacts of displacement; identify development opportunities; develop a resettlement budget and schedule, and establish the entitlements of all categories of affected persons (including host communities).
25-29	Economic displacement	<ul style="list-style-type: none"> In projects involving economic displacement only, the client will develop a LRP to compensate affected persons and communities and offer other assistance that meets this Performance Standard's objectives. The LRP will establish the entitlements of affected persons and communities and will ensure that these are provided in a transparent, consistent, and equitable manner.
30-32	Private sector responsibilities under government-managed resettlement	<ul style="list-style-type: none"> Where Expropriation and resettlement are the government's responsibility, the client will collaborate with the responsible government agency, to the extent permitted by the agency, to achieve outcomes consistent with this Performance Standard. In addition, where government capacity is limited, the client will play an active role during resettlement planning, implementation, and monitoring.

4.3 GAPS BETWEEN NATIONAL REGULATIONS AND IFC PERFORMANCE STANDARD

The key gaps between the Expropriation Law and PS-5 are presented comparatively in the table below for minimizing Project impacts, compensation of land users, defining support to vulnerable people when needed, effective stakeholder engagement process and implementation of grievance mechanism.

Following table presents an assessment on the gaps between Turkish Legislation and IFC PSs.

Table 4: Gaps Between IFC PS-5 and Turkish Legislation

IFC Requirement	National Requirement	Gaps	Actions to Bridge the Gaps	Implementation of TP-OTC
Compensation and benefits to displaced persons				
<p>When displacement cannot be avoided, the client will offer displaced communities and persons compensation for loss of assets at full replacement cost and other assistance to help them improve or restore their standards of living or livelihoods, as provided.</p>	<p>Expropriation Law provides cash compensation to economically and physically displaced people. The valuation process of the lands and the residential buildings are being conducted according to the type of land as defined by the Expropriation Law.</p>	<p>Compensation payments are not always at full replacement cost. Some deductions are made during the valuation process as given by Expropriation Law. Illegal users (users on public lands) or ecosystem usage are not recognized in the scope of the law, but users on private lands are entitled to compensation. Livelihood impacts, including access to agricultural lands due to land division, access to pasture or agricultural lands, marine usage restriction or the construction phase livelihood impacts including noise, dust, light and vibration, are not considered.</p>	<p>LRP fund will be deployed to fishers and PAPs LRP will be implemented. Where possible in-kind compensation and additional assistance will be provided to fishers.</p>	<p>LRP fund will be established for the marine usage restrictions. LRP will be implemented and within the scope of LRP cash compensation for fuel consumption and in-kind compensation will be provided to fishers.</p>
RAP and LRP preparation				
<p>A RAP/LRP is required for the mitigation of the Expropriation and the livelihood impacts.</p>	<p>Turkish Expropriation is limited to land and asset compensations. Compensations are paid in cash through bank accounts directly to the owner of the</p>	<p>Livelihood impacts are not addressed.</p>	<p>A /LRP should be prepared in compliance with IFC PS5 and implemented by TP-OTC</p>	<p>After the approval of the LRP by the Lenders, this plan will be implemented.</p>

IFC Requirement	National Requirement	Gaps	Actions to Bridge the Gaps	Implementation of TP-OTC
	land and assets. Users on public lands and ecosystem and marine users/beneficiaries are not addressed either in the law.			
Definition of the eligibility criteria				
Eligible people may be classified as persons (i) who have formal legal rights to the land or assets they occupy or use; (ii) who do not have formal legal rights to land or assets but have a claim to land that is recognized or recognizable under national law; or (iii) who have no recognizable legal right or claim to the land or assets they occupy or use.	Turkish law covers persons with legal rights/claims and customary/traditional users' rights on private property. There is no provision for those who use public land.	Turkish law only provides compensation for the formal owners and users on private lands (who have a justification of any kind) who have their land ownership registered as part of the Expropriation process. There is no requirement to undertake a census to identify or compensate those not currently included in the official land registry.	A fisheries survey was undertaken in February 2022 to identify all fishers	Eligible fishers were identified according to records of the cooperative and surveys.
Monitoring				
Where Expropriation and resettlement are the government's responsibility, the client will collaborate with the responsible government agency, to the extent permitted by the agency, to achieve outcomes consistent with this Performance Standard. In addition, where	No provision	The law does not require input and output monitoring and a completion audit to assess the effectiveness of the valuation, compensation strategies, Expropriation impacts and the restoration of the livelihoods.	Monitoring activities should be conducted as defined in the plan.	Monitoring activities will be conducted as defined in the plan.

IFC Requirement	National Requirement	Gaps	Actions to Bridge the Gaps	Implementation of TP-OTC
government capacity is limited, the client will play an active role during resettlement planning, implementation, and monitoring.				

5.0 AREA OF INFLUENCE

5.1 Determination of the Onshore Area of Influence

The Area of Influence (Aoi) is the area that may be impacted by a project. Understanding the Aoi is an essential requirement for a social impact assessment (SIA). Following that, the socioeconomic baseline must focus on the Aoi, although the baseline may have a broader focus, depending on the nature and impacts of the project.

According to the Guidance Note 1 Assessment and Management of Environmental and Social Risks and Impacts of IFC (2012), where the project involves specifically identified physical elements, aspects, and facilities that are likely to generate impacts, environmental and social risks and impacts will be identified in the context of the project's Aoi. This Aoi encompasses, as appropriate:

The area likely to be affected by:

1. The project and the client's activities and facilities that are directly owned, operated or managed (including by contractors) and that are a component of the project; impacts from unplanned but predictable developments caused by the project that may occur later or at a different location; or indirect project impacts on biodiversity or on ecosystem services upon which Affected Communities' livelihoods are dependent.
2. Associated facilities, which are facilities that are not funded as part of the project and that would not have been constructed or expanded if the project did not exist and without which the project would not be viable.
3. Cumulative impacts that result from the incremental impact, on areas or resources used or directly impacted by the project, from other existing, planned or reasonably defined developments at the time the risks and impacts identification process is conducted.

Social Aoi defines the communities and settlements that may have positive and negative affect from the project's technical activities and socio-economic influences, including livelihoods, employment, purchasing, health, and safety, land use etc.

The Phase 2 construction and the operation stages will be in the same physical area, Aoi is determined as same as Phase 1. This has given opportunity to evaluate cumulative impacts and potential consequences of Phase 1 and 2.

5.2 Determination of the Offshore Area of Influence

Based on the interviews undertaken during Phase 1 and Phase 2 socio-economic surveys and ongoing engagement with the fishers, it is observed that only the fishers at the Filyos Port are fishing at the Project Area up to 2 miles from the shore. The fishers can travel between the Işıkveren coast of Zonguldak and the Güzelcehisar coast of Bartın.

A NAVTEX (Navigational Telex) announcement is a type of maritime communication issued to provide important information to ships. NAVTEX broadcasts include navigational warnings, weather forecasts, search and rescue information, and urgent maritime safety notices. These announcements are transmitted automatically via radio signals,

In Türkiye, NAVTEX announcements are made by the Office of Navigation, Hydrography, and Oceanography (SHOD), which operates under the Turkish Naval Forces. SHOD is responsible for issuing maritime safety information, including NAVTEX broadcasts, which are transmitted from stations located along the Turkish coast. These broadcasts provide essential information for maritime navigation, such as navigational warnings, weather forecasts, and notices to mariners, ensuring safe navigation in Turkish waters.

During the construction of the Phase 1 offshore sections, several NAVTEX announcements were made. Upon start of the operation phase, the corridor along the Phase 1 offshore pipeline, where restrictions are announced via NAVTEX announcements, was identified as 500 m on either side of the pipeline. Activities such as seabed exploration, unloading, dredging, trawling, and anchoring near the natural gas and MEG pipelines and the cable could damage the pipeline, these activities are restricted within 500 meters on either side of the natural gas

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pipeline and are announced through NAVTEX announcements. The same area remains as the security zone with the same restrictions during the Phase 1 operation phase.

Similarly, 500 m on either side of the Phase 2 export gas pipeline during construction will be subject to restrictions.

The boats cross the restricted corridor solely to travel from Filyos Port towards the eastern coasts, adhering to the restrictions along the pipeline route.

Accordingly, the offshore Area of Influence has been defined as the area extending 2 miles from the shore and 500 meters on either side of the Phase 2 gas export pipeline, encompassing the restricted NAVTEX area, as presented in Section 5, Figure 7-8, Map Showing Social Area of Influence.

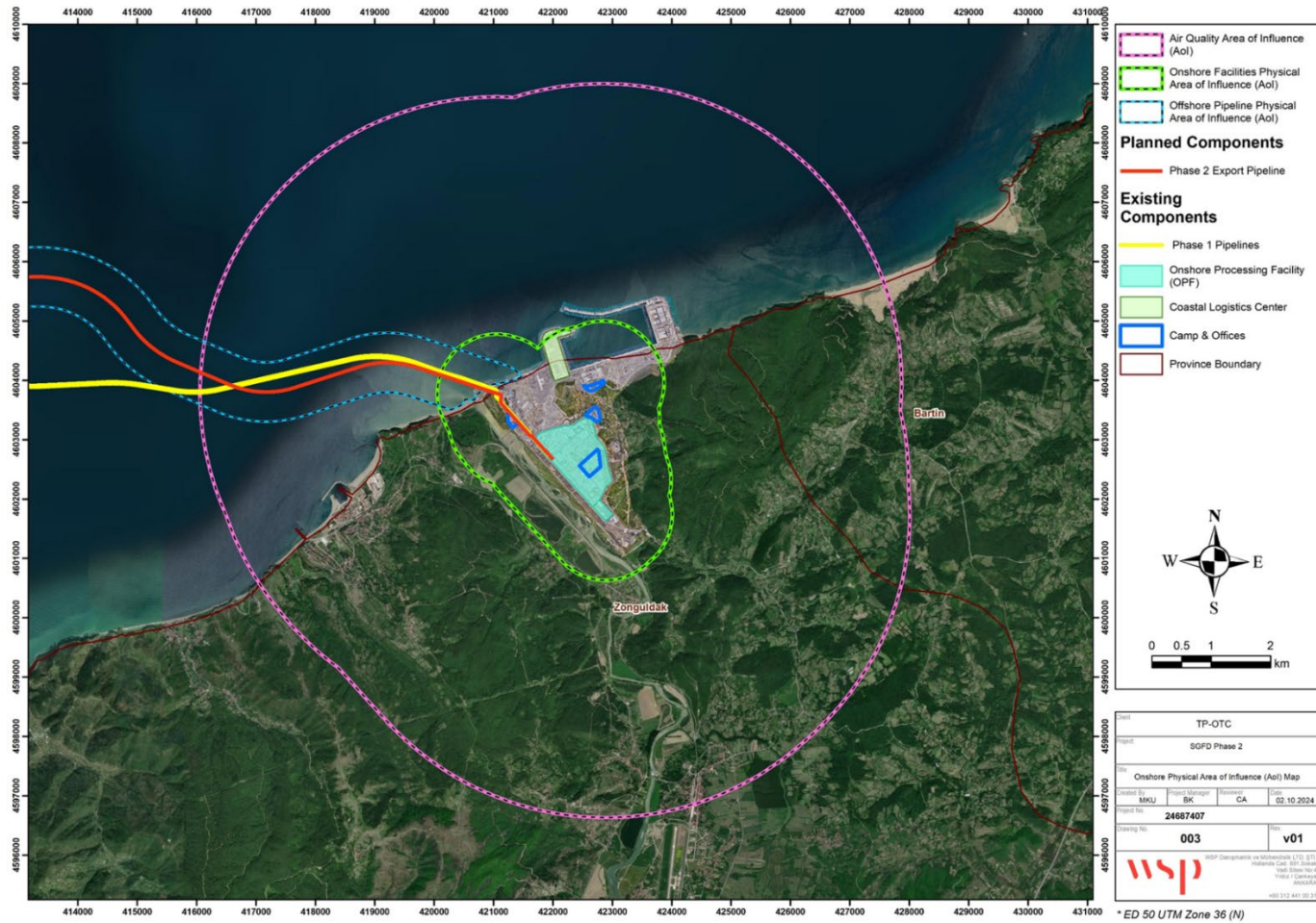


Figure 7: Physical Area of Influence (Onshore)

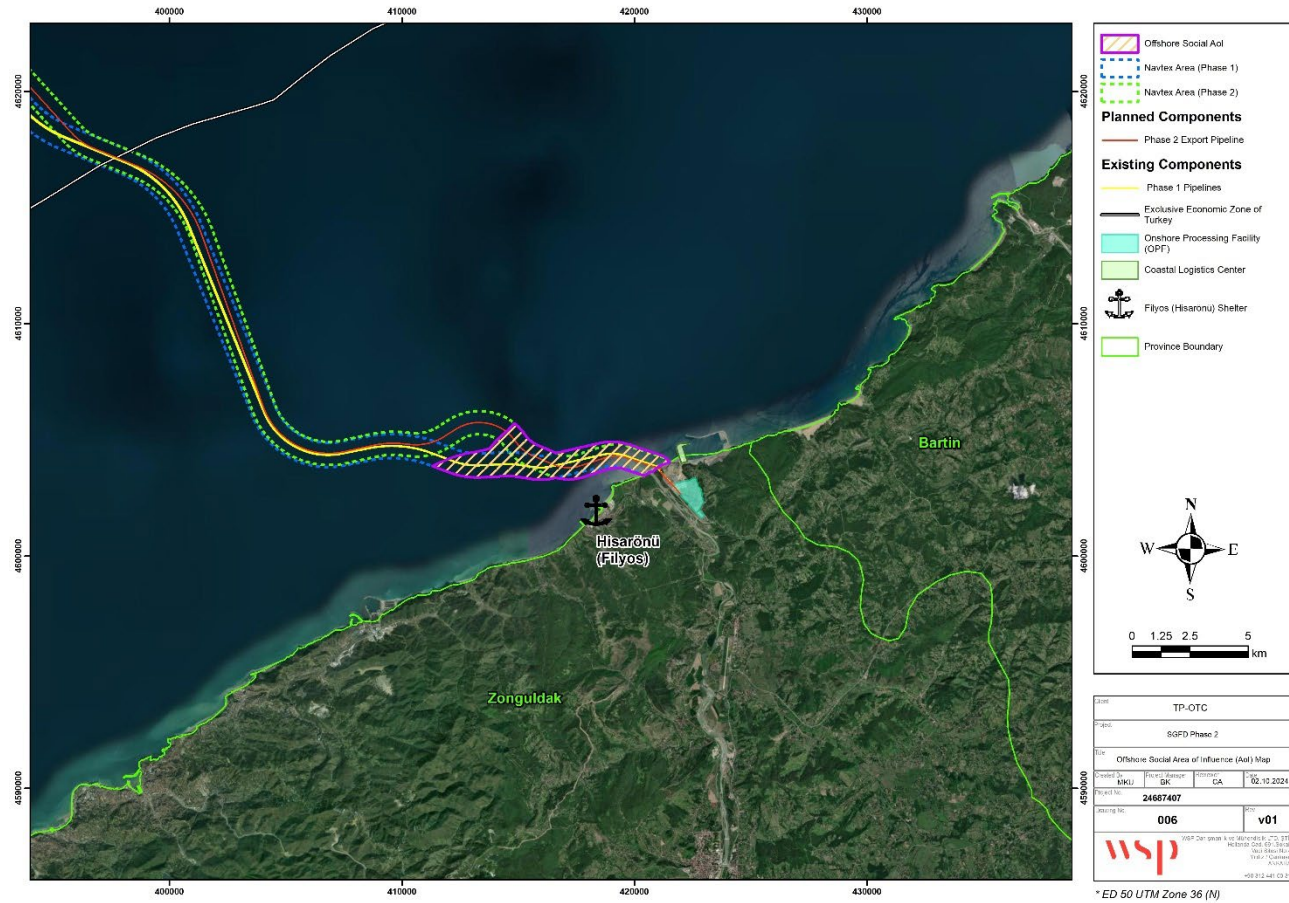


Figure 9: Offshore Social Area of Influence

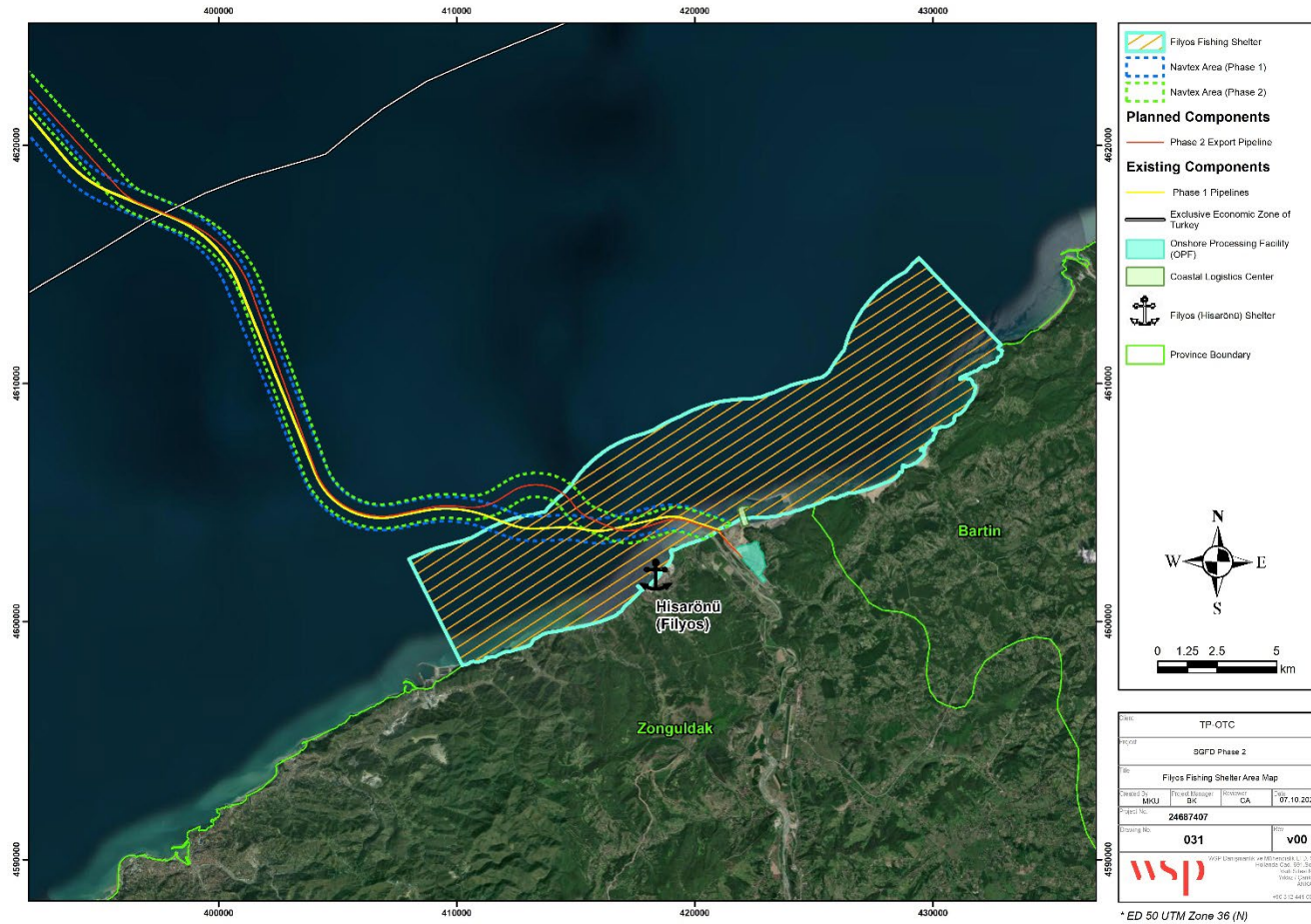


Figure 10: Fishing Areas of Filyos Fishers

6.0 METHODOLOGY

IFC Performance Standard 5 emphasizes the importance of avoiding involuntary resettlement whenever possible. When displacement is unavoidable, companies must minimize its impact by implementing mitigation measures such as fair compensation, livelihood restoration, and improvements to living conditions. Meaningful and continuous community engagement is essential to ensuring that affected individuals participate in decision-making and benefit from resettlement outcomes.

During the preparation of the Phase 2 ESIA and this LRP, interviews were conducted with mukhtars, households in the Project's social Area of Influence (AoI), and members of the Filyos Aquaculture Cooperative to assess the impacts on fishers.

Regarding the ETL built during Phase 1, surveys were held in 2022. In 2024, issues raised during women's focus group meetings and information on the expropriation process obtained from the Project owner were incorporated into the assessment.

Desktop Study

To develop a specific questionnaire for the LRP interviews, a document review was conducted on the LRP prepared during Phase 1 of the Project, assessing whether the proposed livelihood improvement methods were implemented.

Subsequently, questions were added to the questionnaire to evaluate the current socio-economic status of fishers, assess the contribution of fishing to household income, and understand the challenges they face in their fishing activities.

Another objective of this LRP is to determine whether the support provided to fishers in Phase 1 has achieved its intended purpose and to assess its effectiveness and sustainability in ensuring the continuation of fishing activities.

For these reasons, questions on the Project's impacts and proposed mitigation measures were specifically included in both cooperative discussions and one-on-one interviews with fishers.

Meeting with Filyos Aquaculture Cooperative

A special focus group interview was conducted with the Filyos Aquaculture Cooperative during the field survey, in August 2024.

The following topics were covered during the meeting:

- The history of the cooperative and the duration of the current management's tenure
- The number of members and the number of those impacted by the Project
- The cooperative's activities and the support provided to its members
- Satisfaction with the measures identified in Phase 1 of the Project
- Changes in membership numbers after Phase 1, including whether there were newcomers or new members entering the fishing sector
- Difficulties experienced during Phase 1 of the Project
- Whether any violations occurred in the restricted area during the construction and operation of Phase 1
- Methods used to receive information about the Project and how complaints were expressed
- Whether fishers from other ports come to the region to fish
- Expected impacts of Phase 2 and suggestions for preventive measures
- Ways to collaborate among the cooperative, the Project, and relevant institutions to ensure the continuation of fishing in the region.



Figure 11: Meeting with the Cooperative Management

Fisheries Survey

The Cooperative Management stated during the interviews that, 22 fishers with 25 commercial boats, and non-commercial amateur fishers to be impacted from the restrictions, in Filyos.

Quantitative and qualitative data were collected from the fishers during the social site visit held in August 2024. Since non-commercial amateur fishers do not engage in fishing for income, the survey was conducted exclusively for the cooperative's commercial members. In total 20 fishers were surveyed out of 22 registered fishers to Filyos Aquaculture Cooperative. One of those who cannot be interviewed was at his paid job, and the other was the president of the Cooperative with whom a separate meeting was held, as detailed above.

The questionnaire covers the following topics;

- Information on the Project
- Awareness on grievance mechanism
- Demographic characteristics of the participant and his/her household members
- Vulnerability of HHs
- Housing conditions and access to the infrastructure services
- Household assets
- Income sources and income levels
- Details on fishing activities (location, year, tools etc.)
- Type of boats, details of boats
- Season of fishing
- Connected Port
- Type of fishing (seasonal, permanent)

- Number of crew
- Expenditures
- Satisfaction from fishing
- Types and amounts of fishes
- Marketing channels
- Agricultural/animal breeding activities
- Problems of fishing last 3 years
- Problems of the Port
- Evaluation of the Phase 1 LRP supports
- Recommendations for Phase 2

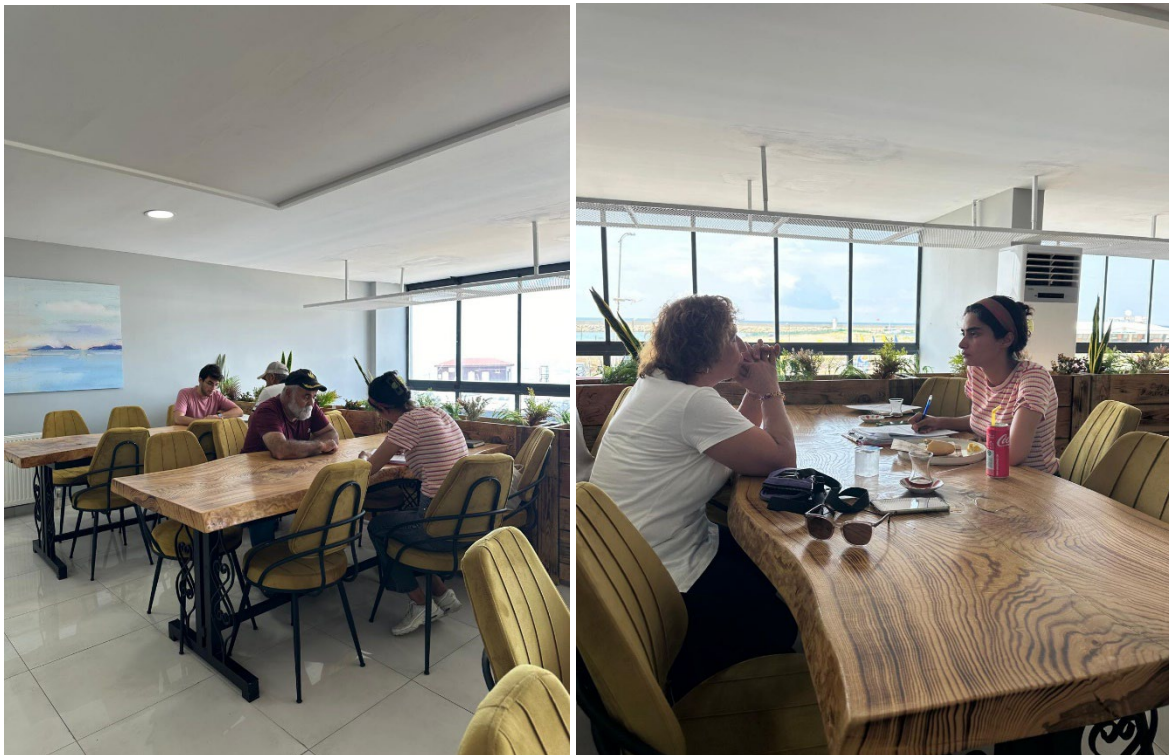


Figure 12 : Interviews with the Cooperative Members

Household Surveys in Aol

In the surveys conducted in the households in the Aol for the ESIA, the questions of whether the household is engaged in fishing and whether there is another livelihood based on fishing were also asked.

None of the respondents stated that they were engaged in fishing or made a livelihood from fishing.

It was also confirmed in the mukhtar interviews that all villagers, including those who did not participate in the household surveys, do not make a living from fishing.

Table 5: Number of Surveyed Households in Aol

Village Name	Number of Households	Number of HHSs	Percentage of households covered by the survey %
Sazköy	45	26	57.77
Aşağıhsaniye	50	23	46.00
Sefercik	45	17	37.77
Gökçeler	68	22	32.35
Derecikören	120	17	14.16
Yeşilyayla	35	8	22.85
Total	363	113	31.12

7.0 SOCIAL SURVEYS

7.1 SOCIOECONOMIC PROFILE OF SETTLEMENT AFFECTED BY ETL

The socioeconomic profile of Aşağıhsaniye, which is affected by the ETL, is summarised based on the information from the interview held with the Mukhtar of Aşağıhsaniye in August 2024 and TURKSTAT data as follows.

An in-depth interview was held with the Mukhtar of Aşağıhsaniye on August 20, 2024. According to the results of the interview, the village population is determined around 170 people consists of 55 households in total. The average household size was determined as 2.87. During the summer period, the total population reaches to 300 people consists of approximately 90 households. The main reason for this increase is temporary migration of the young people for the agricultural production who have lands in the village. Nevertheless, it was noted that reverse migration among the young population increased within 2-3 years due to new job opportunities.

In Aşağıhsaniye Village, basic income sources are agriculture and animal breeding. Primary product is hazelnut and there are households producing vegetables in greenhouses and sell at district bazaar. Mainly corn, pepper, bean, apple, plum are being produced in the village. Grazing lands of Aşağıhsaniye acquired by the Project so that animal breeding decreased in a few years. There are 150 cattle and 100 sheep in total. Chestnut honey production is also popular in the village, for which about 800 beehives are available.

According to the Mukhtar, there is a significant growth in job opportunities in the region and some of the villagers work at TP-OTC, and because of the regular income of the villagers purchasing power increased slightly.

7.2 PROJECT IMPACTS on LAND OWNERS ALONG ETL

According to information obtained from Turkish Electricity Transmission Corporation (TEİAŞ) 29 parcels were affected from the construction of ETL consisting of 8 private parcels and 21 government owned lands.

Update on the Project impacts on ETL, after Phase 1, are evaluated based on some of the issues raised during the women's focus group discussions organised during the Phase 2 ESIA social survey. Following topics were stated by the women of Aşağıhsaniye where the ETL passes very close to the houses;

- employment expectations especially for their children living outside the city,
- completion of expropriation legal processes as soon as possible and making payments,
- concerns about the noise coming from the wires,
- concerns about possible health problems due to magnetic field generation from ETL.

In addition, the grievance records received so far by TP-OTC Social Impact Unit regarding ETL works are reported as follows.

Table 6: Grievance Register – complaints related to ETL

Complainant Name	Complaint Recording Date	Complaint Category	Complaint Sub-category	Definition of the Complaint	Actions	Close-out Date
Zahide Alp	11.10.2022	Social Impact	Damage to land and crops	She stated that damage occurred on his land during the operations for the installation of the Energy Transmission Line S1 pole. She demanded compensation for the damage.	Compensation payment was made by GÜNGÖR Elektrik.	18.10.2022
Levent Ülgen	11.10.2022	Social Impact	Damage to land and crops	He stated that damage occurred on his land during the operations for the installation of the Energy Transmission Line S1 pole. He demanded compensation for the damage.	Compensation payment was made by GÜNGÖR Elektrik.	18.10.2022
İlker Bakar (Aşağıhsaniye Mukhtar)	11.10.2022	Social Impact	Damage to land and crops	He stated that damage occurred on his land during the operations for the installation of the Energy Transmission Line S1 pole. He demanded compensation for the damage.	Compensation payment was made by GÜNGÖR Elektrik.	18.10.2022

Complainant Name	Complaint Recording Date	Complaint Category	Complaint Sub-category	Definition of the Complaint	Actions	Close-out Date
Narkadın Şeker	11.10.2022	Social Impact	Damage to land and crops	She stated that damage occurred on his land during the operations for the installation of the Energy Transmission Line S1 pole. She demanded compensation for the damage.	Compensation payment was made by Güngör Elektrik.	18.10.2022

Apart from the recorded complaints, payments were made by Güngör Elektrik for the assets damaged during the construction works.

Table 7: Paid Compensations for ETL Land Owners

PAYMENTS MADE IN ENERGY TRANSMISSION LINE PARCELS					
Parcel Owner	# of Trees	Unit Price	Tree Species	Amount Paid	Description
Zahide Alp	22	₺1.363,64	Hazelnut	₺30.000	22 hazelnut
Narkadın Şeker	41	₺609,76	Miscellaneous Tree	₺25.000	4 beech, 6 linden, 7 hornbeam, 6 plane, 5 chestnut, 7 oak, 6 hornbeam
Levent Ülgen	26	₺576,92	Miscellaneous Tree	₺15.000	7 poplar, 2 apple, 1 mulberry, 15 hazelnut, 1 walnut
Aşağıhsaniye Muhktarship (İlker Bakar)	-	-		₺6.616	Water Usage Fee
Sevgi Ülgen	34	₺1.470,59	Miscellaneous Tree	₺50.000	5 linden, 2 pine, 10 poplar, 4 hornbeam, 3 plane, 10 hazelnut
Total	123			₺126.616	

All complaints and damages were followed up by the TP-OTC social team and payments were made.

7.3 FISHING BACKGROUND IN THE REGION

According to the Report prepared by Ministry of Agriculture and Forests Directorate of Aquaculture Central Research Institute of Trabzon (2021), fishing in Filyos does not have a long history.

Although the foundation of the Filyos fishing port was laid in 1996, it was completed in 2006. Before that, fishing boats were being pulled into the sand with the help of the capstans/woods. Before the 1980s, fishing in the Filyos settlement was almost non-existent. Low fish prices, small boats, and traditional and primitive fishing did not provide a suitable income and assurance for fishers. In addition, there were not enough number and quality

fishers in the region. There was no significant increase in the number of fishers before the 2000s. The number of fishers did not exceed 5-6 in this period. The existence of coal mining activities in the region, brick factory in Filyos, SEKA, Bartın cement factory in Çaycuma, Ereğli, Karabük Demirçelik enterprises may have put fishing in the second place (Atış and Çelikoğlu, 2019).

As of today, the situation has changed slightly. The number of professional fishers has increased. However, it has been observed that those who fish depending on the Filyos fishing port maintain the local, small coastal fishing structure. Because in Filyos, there are no boats with large fishing characteristics such as drifters and seine fishing.

The Filyos Aquaculture Cooperative was established in 2007, with Zeki Çakar serving as its president. Since then, members and amateur fishers have taken responsibility to develop the Filyos Fishing Shelter together.

There are 22 registered members fishing between the Işıkveren and Güzelcehisar coasts with 25 registered boats. In addition to these 22 commercial fishers, as well as non-commercial amateur fishers in the region.

From east to west, the main fishing settlements on the Amasya Zonguldak line are as follows: Amasra, Tarlaağzı, İnkumu, Güzelcehisar, Muğada, Kızılkum, Filyos, and Kilimli.

As described by the fishers, the fishing area of the Filyos fishers is between Işıkveren coast of Zonguldak and Güzelcehisar coast of Bartın. According to the statements, fishers do not experience any problems passing through the Phase 1 Aol or areas restricted via NAVTEX announcements. In addition, the maximum distance that boats can travel from land is mostly 1 mile, for some up to 2 miles. Fishers mentioned that the depth increased after that distance and the nets were damaged. They stated that they only caught bonito fish after this distance.

According to the President of Filyos Aquaculture Cooperative statement, relationship with other shelters such as Kilimli, Bartın, Tarlaağzı, Kastamonu is to inform each other when migrating fish pass through their borders. This happens 3-4 times a year, apart from this, each shelter knows its own fishing zones and does not go beyond them.

The region is a very rich region in terms of nutrition due to the discharge of rivers such as Bartın river and Yenice (Filyos) River. This also increases the biodiversity of the benthic ecosystem. Among commercial fish species, close coastal waters are quite rich for fish populations with significant economic importance such as turbot and red mullets (Zengin et al, 2020). Yenice River is a stream that is collected and brought together by the streams coming from Köroğlu Mountains, Bolu Mountains and Ilgaz Mountains. This river system, which has a length of up to 228 kilometres, is poured into the Black Sea in Filyos town of Zonguldak. However, due to global warming, the water abundance in Yenice River has decreased to one third of the water abundance in the past. Yenice River suffers greatly due to environmental pollution and factory wastes. While the 'SEKA Paper Factory', which was established on the edge of the stream in 1970, caused great damage to the stream, the pollution problem of the factory was eliminated with the water treatment systems (Atlas, 2009; Atış and Çelikoğlu, 2019).

7.4 SOCIOECONOMIC PROFILE OF FISHERS

The outputs of the social survey carried out in August 2024 are presented in this section.

Registered Fishers and Boat Specifications

Member information and the specifications of the boats are as follows.

Title:	LIVELIHOOD RESTORATION PLAN	Classification:	Internal
DocID:	SC26-OTC-PRJ-PM-PLN-000005	Page:	46 of 77
Rev. :	01		

No	Boat Name	Owner of Boat	KW	HP	Plate Number	Depth	Width	Lenght	Type
1	KURT-67	Musa Kayıkçıoğlu	8,95	12	67 D 1567	0,6	1,7	5,65	Beam trawl/Fishing
2	KUM-67	Hüseyin Keser	89,55	120	67 D 1912	0,64	2,31	6,6	Fishing
3	YİĞİT	Cenk Özdemir	7,46	10	67 D 1560	0,7	1,5	5,7	Fishing
4	ALPERİM	Ayberk Kumbas	12,68	17	67 D 1585	0,7	1,9	6,14	Fishing
5	BABA NAZİF-1	Kemal Ülkeri	67,16	90	67 D 2017	1,7	4,5	9,6	Fishing
6	ALİ DAYI	Ali Erişir	55,22	74	67 D 1980	1,2	3,3	7,2	Fishing
7	KASAP-1	Kerem Yücel	100,71	135	67 D 1543	1,3	2,75	8,3	Fishing
	KASAP REİS-2		89,55	120	67 D 1359	0,6	1,7	7,6	Fishing
8	ŞAFAK-1	Demet Sefercık	46,25	62	67 D 1776	0,8	2,3	6,05	Fishing
9	KARA ZEKİ	Zeki Kaçar	186,57	250	67 C 1951	1,6	4,9	10,8	Beam trawl/Fishing
	İLKAY T		59,68	80	67 D 1742	1,1	3,1	8,7	Beam trawl/Fishing
10	KORAT	Hasan Mutlu	67,14	90	67 C 2045	1,7	4,65	10,2	Beam trawl/Fishing
11	KORKMAZLAR-A	Ali Korkmaz	15,67	21	67 D 1738	0,95	2,16	6,45	Fishing
12	CINAR TURGUT	Özcan Hakan Telçeker	6,71	9	67 D 1901	1,02	6,2	4	Fishing
13	MACİROĞLU-2	Zeki Çakar	85,82	115	67 D 1983	0,68	2,3	6,4	Fishing
14	BEYBABA-1	Sedat Köktürk	60,45	81	67 D 1573	0,9	1,7	6,3	Fishing
15	BURAK REİS-2	Burak Kayıkçıoğlu	23,87	32	67 D 1174	0,65	2,15	7	Fishing
16	MELİHCAN	Ismail Arslan	16,05	22	67 D 1027	0,77	1,67	6	Fishing
17	ŞEF	Aykut Aydın	61,19	82	67 D 1977	1	2,8	8,04	Fishing
18	AKGÜNLER A	Osman Akgün	89,55	120	67 D 1990	1	3,18	8,04	Fishing
19	MACİR REİS	Şükrü Çakar	186,57	250	67 C 1876	1,66	4,7	10,3	Beam trawl/Fishing
20	AKSA-67	Kerem Parlak	78,36	105	67 D 1611	1,15	3,28	7,82	Fishing
21	ONUR 67	Nezaket Katırcı	41,79	56	67 D 1207	0,87	2,62	7,27	Fishing
	DERİNDENİZ 67		20,15	27	67 D 2008	0,64	1,8	4,9	Fishing
22	ERCÜMENT	Haldun Çakar	114,93	154	67 D 1574	0,6	2,43	6,6	Beam trawl/Fishing

Figure 13: List of Fishers

Project Information Level of Fishers

The Public Participation Meeting of the Phase 2 national EIA was held in August 2024, prior to the interviews held for the Phase 2 ESIA in August 2024. The fishers are aware of the Phase -2 construction. The Management of the Cooperative has attended to Phase-2 Public Participation Meeting. The President said they would like to know the new coordinates and after the EIA approval they should be provided with a map, and the buoy positions can be checked.

It has been observed that, 85% of the fishers in Filyos, have information on the Project. The majority of the fishers receive information from the Project Owner and a few from the Coast Guard and Project staff.

Table 8: Information on the Project among Fishers

Port	Information	Frequency	Percent
Filyos	Yes	17	85.0
	No	3	15.0
	Total	20	100.0

The fishers mainly wanted to be informed about the new boundaries of the areas to be restricted via NAVTEX announcements, duration of the Project, additional impacts on fisheries and aquaculture, transit corridors and benefits for fishers.

During the survey and interviews, it was observed that although fishing is not the primary income for any of them, they are willing to continue fishing.

Age Distribution and Education Level of Fishers

After the survey for Phase 1, it was noted that there were fishers over the age of 65. Also, majority of the fishers are at the age of 40 and above. The primary reason of the density of the elderly population is in parallel with the retired fisheries. The table below summarizes the age distribution of the fishers based on the survey undertaken in August 2024 for Phase 2.

Table 9: Age Distribution of the Fishers

Port	Age Groups	No of participants	%
Filyos	19-25	1	5.0
	26-39	3	15.0
	40-55	9	45.0
	56-65	4	20.0
	65+	3	15.0
	Total	20	100.0

20% of the fishers are middle school graduate or primary education graduated, followed by primary school graduates and high school graduates, and university respectively.

Table 10: Education Levels of the Fishers

Port	Education Status	Frequency	Percent
Filyos	Primary school graduated	6	30.0
	Middle School graduate or primary education graduated	4	20.0
	High school or university graduated	10	50.0
	Total	20	100.0

Income sources of the Fishers

According to the results of the in-depth interviews, the 40% of the members who declared fishing as their first source of income are retired fishers who earn more income from fishing than their pension. Half of the group of retirees stated that fishing income becomes their primary source of livelihood if the season is productive.

The primary source of income of fishers who are state officer and salaried employees, is their salaries, while fishing is stated as a subsidiary source of income.

In addition, fishers were asked about their main expenditures, and almost all of the answers were declared as repair and maintenance of boats, nets and other fishing equipment and diesel expenses.

Table 11: First Income Source of the Fishers

Port	First income source	Frequency	Percent
Filyos	State officer	1	5.0
	Retired	6	30.0
	Paid / Salaried	5	25.0
	Fishery	8	40.0
	Total	20	100.0

In response to the question whether there has been a change in the level of income in the last 2 years, almost all fishers answered that it has decreased. The Project, Eren Energy Port and dolphins were cited as the reason. In addition to the restrictions caused by the Project on fishing areas, it was stated that pollution occurred from Eren Energy Port, which is a licensed coastal waste receipt port.

The average monthly income of fishers is presented in the table below. It is seen that the average income of most of the fishers is nearly double of the minimum wage level.

There is an average of 4 crew on each vessel. There are approximately 58 crews in total in Filyos.

The owner receives half of the vessel income, and the other half is shared among the crew.

Table 12: Average Incomes of the Fishers

Port	Average Incomes	Frequency	Percent
Filyos	0-10,000 TL	1	5.0
	15,000-20,000 TL	2	10.0
	20,000-25,000 TL	3	15.0
	25,000-30,000 TL	2	10.0
	over 30,000 TL	11	55.0
	No answer	1	5.0
	Total	20	100.0

Satisfaction Level from Income of Fishing

The responses to the question ‘What are the most important problems you have encountered in fisheries in recent years?’ are as follows; narrowing of pastures due to the Project, increase in expenses, and decrease in fish species, increase of dolphins and Eren Energy Port.

Table 13: Satisfaction Level from Income

Port	Satisfaction Level	Frequency	Percentage
Filyos	Yes	3	15.0
	No	17	85.0
	total	20	100.0

Fishing Areas

According to the results of the interviews it is seen that Işıkveren coast of Zonguldak and Güzelcehisar coast of Bartın provinces is being used for fishing by the Filyos fishers. They fish up to 3.7 km (2 miles) offshore. The maximum fishing depth is 70 meters.

Due to the power of the boats owned by the fishers, the distance they can sail is limited. They have difficulties due to increasing fuel prices rather than the amount of diesel use to travel.

Respondents were asked about the main challenges of fishing around the Project area. The majority of the fishers said that the fishing pasture has been narrowed and they are not allowed to fish in the restricted area although the nets do not go deep. In addition, they cannot see the fish because of the Project lights.

Type of Fishing

According to the results of the interviews with the fishers it has been observed that the most fishers has their own boats and only 23.8% of the fishers are using their boats with their family members.

Table 14: Type of Fishing Activities

	Boat Ownership	Frequency	Percentage
Filyos	Owned by the fisher	15	71.4
	Shareholder with the family members	5	23.8

	Boat Ownership	Frequency	Percentage
	No answer	1	4.8
	Total	21	100.0

According to the site observations and the outputs of the interviews it has been observed that majority of the fisher uses small boats around 10 m length. Only 12% of the boats in Filyos port has boats over 10 m length.

Fishing Methods and Fishing Season

Members of Filyos Aquaculture Cooperative usually practice the activity in the coastal areas with netting techniques. Also, bottom fishing is in practice mostly in winter. Fishing is done almost every month of the year. There are also divers in Filyos and mostly dive in August to collect snail.

Since the majority of the fishermen are retired, fishing is carried out almost every month of the year. It was stated that during the periods when fishing is prohibited, angling is carried out from the shore.

Table 15: Fishing Type

	Fishing Type	Frequency	Percentage
Filyos	Full time	9	45.0
	Seasonal	7	35.0
	Half time / side job aspect	3	15.0
	No answer	1	5.0
	Total	20	100.0

Fish Species Caught by Months

It can be seen that almost every month there is income from fishing. According to the statements of fishers, table of appearance of fish species by month is presented below.

Table 16: Fish Species by Month

Fish Species /Month	Snail	Bonito	Whiting	Red Mullet	Horse Mackerel	Garfish	Turbot	Chinook	Bluefish
January									
February									
March									
April									
May									
June									
July									
August									
September									
October									
November									
December									

“Snails are the most productive seafood. Except for the very cold months, we collect them especially in the upper part of the harbour and send them to Samsun. We know that it is sent to China from there. We can collect 10-12 sacks a day, but now there is a tax on snails”, stated the President of the Cooperative.

While information on fish species and fishing periods was obtained, it was determined that fishers do not keep records of their catch amounts. All data were derived from interviews, as no written evidence was provided. This finding is aligned with the surveys and engagement undertaken during Phase 1 where no evidence was provided other than verbal statements. It was learned during interviews with madrabaz (middlemen) that no records are kept regarding the amount of fish received.

Fishers and cooperative management have been informed about the importance of recording fish species, fishing periods, and catch amounts. This information has been communicated to the fishers in meetings held in 2022, 2023 and 2024 by TP-OTC and during the preparation and disclosure of the LRP prepared in 2022.

It was emphasised that maintaining such a records, could help identify the reason behind changes in catch amounts and quantify the reported changes.

Additionally, it was explained that these records would make it possible to assess the impacts of the Project and the effects of climate, environmental changes and other factors on the fisheries in the region.

An Offshore Biodiversity Monitoring Plan has been developed to monitor the status of the marine ecosystems and of the organisms living in them. The monitoring will focus on fisheries key species, evaluating the catch per effort ratio and possible fluctuations on species richness and relative abundances.

Fishers also lamented a reduction of fish species from the industrial port construction, however, the review of fish abundance and biodiversity data collected from the area as part of the planned monitoring for Phase 1 of Sakarya project showed no evident sign of diminishing biodiversity. The first (August 2023) and last (Oct-Nov 2024) monitoring from Phase 1 showed the same number of species recorded (19 each) with little difference in abundance due probably to the different sampling seasons (summer and late autumn). Additional monitoring has been planned to further assess any fluctuation on fish abundance and diversity between the area of influence of the project and the adjacent Filyos fishing port area. **Fisheries Infrastructures**

Fishers did not report having any market issues. Mostly they sell their catch to restaurants, nearby settlements and markets and to the middlemen (madrabaz). They stated that if there was an ice machine in the shelter, they could store and sell it under more favourable conditions.

The Cooperative collects a monthly fee which is 150 TL from each member. The main tasks of the cooperative are to provide a safe place for the shelter with fencing and security cameras, to organize the cleaning of the quay, to guide the fishers to complete the paperwork with the Port Authority.

During the interviews, it was stated that, some of the fishers quit fishing and sold their boats, during Phase-1 construction. On the contrary, one person has just started fishing in the area as a hobby.

It has been observed that most of the fishers do not desire to give up fishing. On the other hand, they do not prefer their children to start fishing as their main income-generating activity.

The main problems of Filyos Shelter are stated as lack of a boat maintenance place, lack of a closed area for fishing nets, theft, lack of sheds and toilets, damage to boats due to the filling of the entrance and exit of the docks with sand, and the lack of income source of the co-operative.

According to the statements, 40% of the fishers claim to have loan debts due to fishing.

The reasons why fishers started fishing were examined. According to the responses from participants, approximately 25% cited an interest in the sea as the main reason, 50% mentioned it being their father's occupation, 20% attributed it to insufficient job opportunities in the region, and 5% said they started for hobby purposes.

7.5 PROJECT IMPACTS on FISHERS

NAVTEX impacts and other Project related impacts are discussed with the fishers in August 2024.

- The fishers reported that their fishing area is approximately max.2 miles from the shore.
- In response to the question "Has there been a change in your income from fishing in the last 2 years? What is the reason for the change?" They stated that there was a decrease in income due to the restricted pasture area due to the harbour project, although the nets do not go deep.

- 100% of the interviewed fishers stated that they could not see the fish during night fishing due to the light coming from the port.
- In addition to these 20% of the fishers stated that they would quit fishing in the future due to high costs and low income .

8.0 LIVELIHOODS IMPACTS of THE PROJECT

Considering all the identified components, the project has some impacts on livelihoods starting from Phase 1.

For this reason, following the studies carried out within the scope of IFC PS5, mitigation measures were determined by considering the impacts of Phase 1 construction and operation works.

In this context, support was provided for income generating activities by implementing the following measures identified for Phase 1.

8.1 PHASE-1 LRP IMPLEMENTATIONS

A Livelihood Restoration Plan for Phase 1 (Doc.No: SC26-OTC-PRJ-PM-PLN-000005_R05, January 2023) was prepared and disclosed to the fishers. Following the disclosure of the Phase 1 LRP following were implemented;

- Cash compensation for diesel consumption of each fisher was paid by TP-OTC in June 2023. The calculation was based on the engine power of each boat.
- Fishing net support was requested by the fishers and new nets were purchased by TP-OTC for 4 fishers whose nets were damaged.
- TP-OTC has supported Cooperative by granting 2 containers, which are located at Filyos Shelter and used as president office and meeting room.



Figure 14: Containers granted by TP-OTC

8.2 RECOMMENDATIONS / EXPECTATIONS OF THE FISHERS FOR PHASE 2

When fishers were asked about their satisfaction with the diesel support given in Phase 1, they stated that it provided an instant support which is not sufficient.

However, they offered some suggestions especially for the improvement of the physical conditions of the shelter due to the lack of economic power of the co-operative. The recommendations of the fishers are given below;

- Support in obtaining permits for the establishment of a cafeteria or a restaurant in the shelter to be operated by the cooperative in order to generate income

- The construction of a towing system to be used during the landing of the boats for maintenance and repair, as a considerable amount of crane money is paid by each fishers,
- The construction of sheds for each fisher to protect nets and other equipment in the existing vacant areas in the shelter,
- Providing toilets to the shelter,
- Providing cash support every month like a monthly salary,
- Cooperative and accounting training for cooperative management,
- Ice machine supply to the shelter,
- Lengthening the breakwater in front of the shelter and making it suitable for the entrance of large ships,
- Adjust the harbour lights and support night fishing,
- Expansion of the hunting area, allowing a certain area to be hunted.



Figure 15: General View of Filyos Shelter

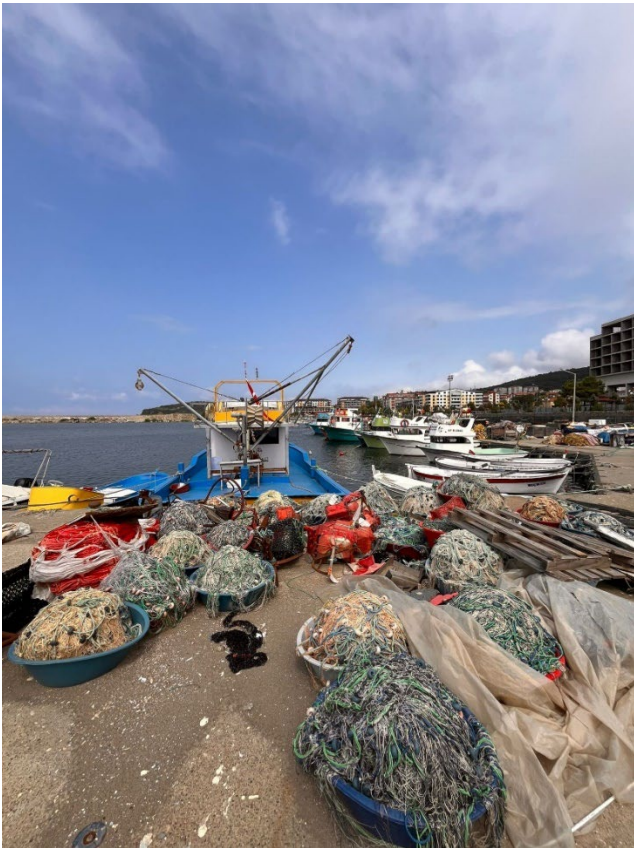


Figure 16: Fishing Nets Without Storage Area



Figure 17: Areas Suitable for Building Sheds

8.3 FUTURE STAKEHOLDER ENGAGEMENT ACTIVITIES

Information Disclosure activities will be followed with fishing stakeholder engagement process. The aims of the stakeholder engagement activities are;

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- to inform the fishers about the construction and operation activities,
- to update fishers about the restrictions,
- to monitor the implementation of LRP projects,
- to respond the concerns and suggestions of the fishers,
- to implement grievance mechanism,
- to maintain sustainable and transparent relations with the stakeholders.

The engagement activities will be led by the Social Team of TP-OTC via Social Impact Specialist and CLO of the project. Offshore Construction Expert, Health and Safety Expert, Environmental Expert, Offshore Operation Expert and other experts may contribute to the engagement process when required.

The project Stakeholder Engagement Plan (SEP) describes the engagement methodology and process however due to the offshore restrictions, the fishing community and authorities related to the offshore activities needs a special attention. Therefore, fishing engagement activities will define additional activities on top of the project SEP. The engagement activities are as follows:

Table 17: Engagement Plan

Engagement Type	Agenda	Engagement Methods	Stakeholders	Time Table/ Frequency
ESIA disclosure	Phase2 ESIA contents	Presentations	Filyos Aquaculture Cooperative Management and members	After the official ESIA disclosure
		Brochures	Non registered and amateur fishers (if possible)	
LRP disclosure	LRP findings	Summary of LRP report	Filyos Aquaculture Cooperative Management and members	After official LRP disclosure
	Decisions on LRP projects	Presentations		
Project updates	Grievances/suggestions on Phase1 LRP implementation process	Booklets		Monthly
	Updates about ongoing construction activities	Face to face meetings	Filyos Aquaculture Cooperative Management and members	
	Local employment opportunities	Visits to Cooperative office	Non registered and amateur fishers (if possible)	
	Local procurement opportunities	Inviting the fishers to TP-OTC offices and working sites		
	Information about operation phase	Posters		
	Information regarding NAVTEX announcements			
	Information regarding restrictions			
	Grievance management system			
	Engagement channels			
	Regular informative meetings	Updates about the Project	Visits to related stakeholders	
Replying questions about the Project		Presentations	Zonguldak Gendarmerie Command, Zonguldak Coast Guard Command, Çaycuma Coast Guard Command	Quarterly
Taking suggestion/grievances		Booklets	Bartın Fishing Cooperative and Zonguldak Fishing Cooperative	If needed

9.0 ELIGIBILITY ENTITLEMENTS AND DEVELOPMENT SUPPORTS

The aim of determining an eligibility matrix is to ensure that the PAPs who are affected by the economic displacement of the Project, that includes, commercial fishers, crews of the boats, boat owners, non-commercial and amateur fishers.

9.1 DEFINING PROJECT AFFECTED PEOPLE

Project-affected people (PAPs) are defined in according to IFC PS-5 refers to all who affected as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily. Eligible PAPs may be in any of the following situations:

- (I) have formal legal rights to the land/structure they occupy;
- (II) do not have formal legal rights to land, but have a claim to land that is recognized or recognizable under the national laws (e.g. ancestral, traditional lands);
- (III) are dependent on the impacted land for their livelihood by way of customary access to natural resources;
- (IV) have no recognizable legal right or claim to the land or structure they occupy; and/or
- (V) economically displaced persons who face loss of assets or access to assets.
- (VI) Vulnerable people

According to the above definition, PAPs are determined as follows.

Table 18: PAPs

Topics	Details
Land Owners	■ Owners of 8 parcels in Aşağıhsaniye Village (ETL)
Crews	■ Employment income (80 people including boat owners)
Commercial fishers	■ Income and side income from fishing (22 people – boat owners)
Amateur fishers	■ Fishing for sport and recreation or for household consumption (approximately 200 people, as reported by the Cooperative Representative)

9.2 ELIGIBILITY CRITERIA

9.2.1 Land Based

According to information obtained from Turkish Electricity Transmission Corporation (TEİAŞ) 29 parcels were affected from the construction of ETL consisting of 8 private parcels and 21 government owned lands.

Table 19: Parcels and Owners (ETL)

Plot	Parcel	Number of Owners
106	21	35
111	5	38
122	3	8
122	2	1
122	4	11
122	5	12

Plot	Parcel	Number of Owners
119	13	1
119	25	12
Total		118

As part of the expropriation law, the objections of the owners to the unit prices and the agreement processes continue. No other compensation method has been applied except for the damages incurred during the construction period.

9.2.2 Fishers

Diesel support was planned to ensure the continuation of income sources not only for the boat owners but also for the crews of the boats, during Phase-1 LRP implementations.

However, during the one-on-one interviews conducted in August 2024, it was clearly stated by the fishers that, one-time diesel subsidy did not provide a sustainable benefit as they thought.

Therefore, the answers to the question of "what are the issues that you can cooperate with the Project in order to continue fishing" were given in Section 8.2 Recommendations / Expectations of the Fishers for Phase 2.

The most important issue agreed upon by TP-OTC and fishers in the ongoing communication activities since the beginning of the Project is the continuation of fishing in the region while the Project continues.

Considering the meetings held for this purpose, technical researches, socio-economic data collection interviews, supports provided and the duration of the Project life, it will be necessary to proceed with sustainable solutions that will reduce fishing expenses and minimise the problems experienced in fishing areas.

Cash compensations suggested by the fishers, like a monthly salary, may cause unexpected increases in the number of cooperative members in the future and may create chaos contrary to what is desired. During the surveys, it was stated that only 2 out of 20 fishers are engaged in agriculture and produce vegetables only for household consumption. In addition, there are no businesses, facilities or touristic areas in the Project impact area.

However, considering the field observations, similar practices and suggestions of fishers, implementation of the projects given in Table 20 will provide long-term benefits, sustainable fisheries and ease of monitoring and reporting the difference created by the support provided.

It has to be noted that some of the suggestions would benefit not only cooperative members but also other unregistered and amateur fishers in the region.

Based on this information, it is determined that it is not possible to support another source of income other than supporting fisheries. From this perspective, PAPs that are expected to benefit from Phase 2 LRP implementations are identified as table below.

It will be necessary to explain the suggestions made during the communication with the cooperative management and fishers, which are found appropriate within the scope of the LRP, and to communicate clearly and transparently why those that are not found appropriate.

Table 20: Eligibility Matrix for Fishers

Suggested Livelihood Development Project	Project Outputs	Beneficiaries	Monitoring and Evaluation	Responsible Party
The construction of a towing system to be used during the landing of the boats for maintenance and repair, as a considerable amount of crane money is paid by each fishers	<ul style="list-style-type: none"> - Maintenance costs will be reduced. During the maintenance of the boats, which is the biggest expense item, they need to be landed. in this process, fishers need a crane and pay not a small amount of money - With a single project, each of them will be assisted above the cash support proposed by the fishers 	All fishers in the region	<ul style="list-style-type: none"> - Records of the number of times fishers using the system, when they use it etc - Crane fees for each season - Maintenance expenditures for the system - Comparison of the expenditures for the system, crane fees and the benefits of the fishers for each season 	Cooperative Management TP-OTC
The construction of sheds for each fishers to protect nets and other equipment in the existing vacant areas in the shelter	<ul style="list-style-type: none"> - The budget allocated for the maintenance and repair of nets and other equipment, which is one of the biggest expense items of fishers, will be reduced - Possible theft incidents will be prevented 	All fishers who go fishing from the shelter	<ul style="list-style-type: none"> - Delivery record of the sheds to the fishers - Satisfaction surveys to be conducted with fishers 	Cooperative Management TP-OTC
Providing toilets to the shelter	<ul style="list-style-type: none"> - With the fulfilment of this humanitarian need, a deficiency expressed by almost all fishers will be completed. 	All fishers in the region	<ul style="list-style-type: none"> - Satisfaction surveys to be conducted with fishers 	Cooperative Management TP-OTC
Ice machine supply to the shelter	<ul style="list-style-type: none"> - Fishers will be provided with the opportunity to earn more income by storing the fish for a long time - The cooperative will be able to generate income by selling ice blocks to other fishers 	Members of Cooperative Management of Cooperative	<ul style="list-style-type: none"> - Comparison with the expenditure for ice moulds - Recording the income to be obtained from the ice moulds sold 	Cooperative Management TP-OTC
Adjust the harbour lights and support night fishing,	<ul style="list-style-type: none"> - As claimed by the fishers, the amount of fishing that decreases at night will be increased - If possible, a positive perception can be created by explaining the adjustment to be made in the harbour lights to the fishers 	Fishers who are fishing around the Project restricted area	<ul style="list-style-type: none"> - Records of changes in the amount of night fishing - Satisfaction surveys to be conducted with fishers 	TP-OTC
Expansion of the hunting area, allowing a certain area to be hunted.	<ul style="list-style-type: none"> - In Phase 2, minimising the impact by reducing the shrinkage in the planned fishing areas to a minimum - Evaluating the areas to be proposed by the fishers together with TP-OTC management and working together with the fishers on the map 	Fishers who are fishing around the Project restricted area	<ul style="list-style-type: none"> - Records of the change in fishing quantities - Changes on income levels of the fishers 	TP-OTC
Cooperative management and accounting training to Cooperative	<ul style="list-style-type: none"> - Systematic progress of cooperative activities will be ensured - With the competencies to be gained, unnecessary expenses incurred by the cooperative in these matters will be prevented 	Cooperative Management and Members	<ul style="list-style-type: none"> - Number of the executives and members who received training certificates 	TP-OTC

Suggested Livelihood Development Project	Project Outputs	Beneficiaries	Monitoring and Evaluation	Responsible Party
			- Reducing Co-operative expenditure for accounting	
COLREG, GPS usage, map reading trainings to fishers	<ul style="list-style-type: none"> - Full compliance with the Project implementations will be provided to fishers - Reduce the damages of fishing nets by applying the project requirements offshore. 	Cooperative members Project owner	- Number of fishers participating in trainings	TO-OTC
Support in obtaining permits for the establishment of a cafeteria or a restaurant in the shelter to be operated by the cooperative in order to generate income	<ul style="list-style-type: none"> - The income of the cooperative is only 150TL received monthly from the members. Therefore, TP-OTC's support in creating a different source of income will support the co-operative in developing its activities. - Fishers will reduce food costs by eating cheaper in that facility 	Existing members and other fishers who will become members by recognising the diversity and benefits of co-operative activities All Filyos residents and tourists	<ul style="list-style-type: none"> - Records of income from the business - Records of the activities in which the income generated is used - Determining the degree to which fishers can benefit from the enterprise 	TP-OTC

10.0 LIVELIHOOD RESTORATION AND IMPROVEMENT

10.1 Rationale and Principles

The restrictions introduced in the safety corridor to eliminate disruption risks of the offshore construction activities and to ensure H&S risks are mitigated will have direct impact on fishing and diving activities. The impacts are expected to be financial and social. The scale of the impacts was identified in detailed during the ESIA study, but since the underwater topography and the climate limits the fishing ground around Filyos, the impacts is expected on fishers operates around Filyos area.

Sakarya Gas Field Development project is committed to restore and develop the livelihoods of the impacted communities. For this purpose, the development strategies suggested in the table above will be worked on.

The approach to livelihood restoration will follow the principles below:

- Implementation of agreed projects in a timely manner and in dialogue with stakeholders,
- Maintaining transparent communication with stakeholders in all processes,
- Regularly monitor the contribution and impact of identified projects and share with stakeholders,
- Will ensure that projects are carried out in a way that is inclusive of disadvantaged groups in particular.

10.2 Implementation Schedule

Expansion of the hunting area, allowing hunting in a certain area and adjust the harbour lights and support night fishing are among the important issues that should be evaluated by TP-OTC and feedback to the fishers should be provided as soon as possible.

It is important to involve Coast Guard teams in the evaluation of these recommendations and to share the decisions to be made.

Since the Coast Guard has the knowledge, punishments to be faced by fishers can be prevented.

The projects identified beyond these topics will be implemented according to the schedule below, and support will be granted to the development of livelihoods with a long-term and sustainable support.

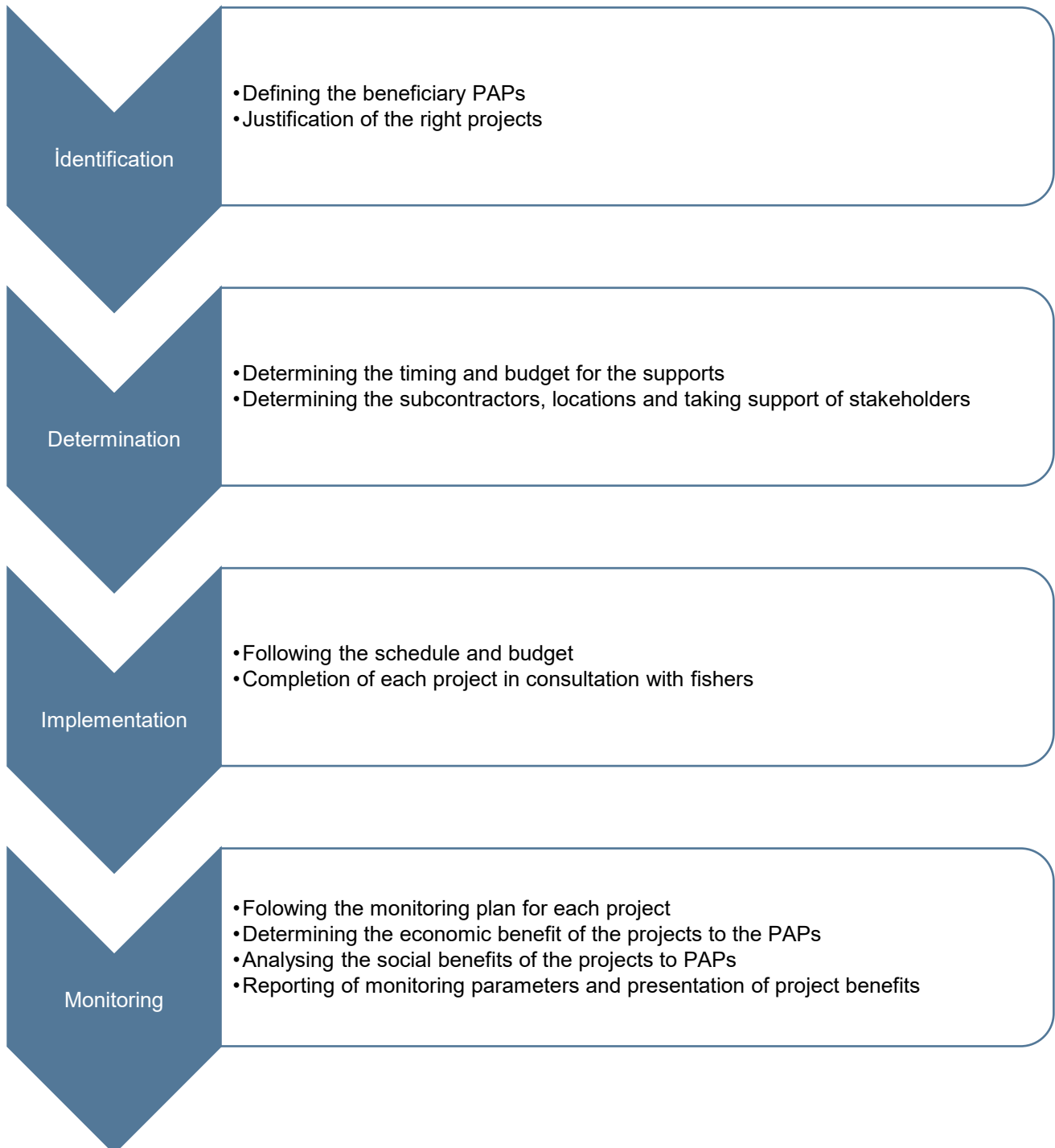
Table 21: Project Implementation Schedule

Projects	2025		2026				2027			
	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Shed Construction										
Cooperative management and accounting training										
Colreg, GPS usage, map reading trainings										
Toilet Containers Providing										
Towing System Construction										
Training on Fishing Techniques										
Permitting Support for Business Establishment										
Ice Machine Providing										
Fish Marketing Training										

10.3 Methodology of the LRP Supports

The key point of the methodology is that; the developed LRP supports are planned as in-kind supports but will be implemented by giving financially.

PAPs will be compensated by the following method:



11.0 GRIEVANCE MECHANISM

The grievance mechanism has been prepared and is implemented to ensure that the Company is responsive to any concerns and complaints particularly from affected stakeholders and communities. Special care placed on the training of the designated staff involved in the management of the grievance mechanism. The grievance mechanism is open and accessible to all individuals and groups. TPAO is consulted for grievances that are related to expropriation.

The Project has a transparent and unbiased grievance mechanism to:

- identify issues and concerns as early as possible to address them timely and proactively
- continuously improve Project performance
- demonstrate Project’s commitment to meaningful stakeholder engagement, and respect for stakeholders’ opinions and concerns.

11.1 PRINCIPLES

The Project has a grievance procedure based on following key principles:

- Any person or organization can express concerns, complaints, and grievances at any time, without fear of retribution and retaliation.
- All grievances are treated in a fair and respectful manner.
- When a grievance is received, TP-OTC will respond to the stakeholder to confirm its receipt within five (5) business days. At this time, the stakeholder will also be provided information about response times, next steps, and a contact within the team. The target is to resolve grievances within 30 calendar days.
- It is ideal for complaints of harms and damages to be resolved within a few days to avoid loss of livelihood. Grievances involving significant issues like property damage or injury should be addressed promptly, typically within seven days.
- The process (receive, investigate and resolve) is consistent and transparent.
- Information about a grievance (and related investigations and decisions) is documented.
- Personal information about the affected stakeholders is treated as confidential. TP-OTC respect other confidentiality requests as needed. Submission of anonymous grievances shall be allowed. The grievance mechanism also receives complaints related to gender-based violence, sexual harassment and sexual exploitation and abuse (GBV-SHSEA). The related to project activities, project management, TP-OTC activities or contractor including sub-contractor activities can be submitted through grievance mechanism.

The steps that are followed for the resolution of grievances is shown in the diagram below.

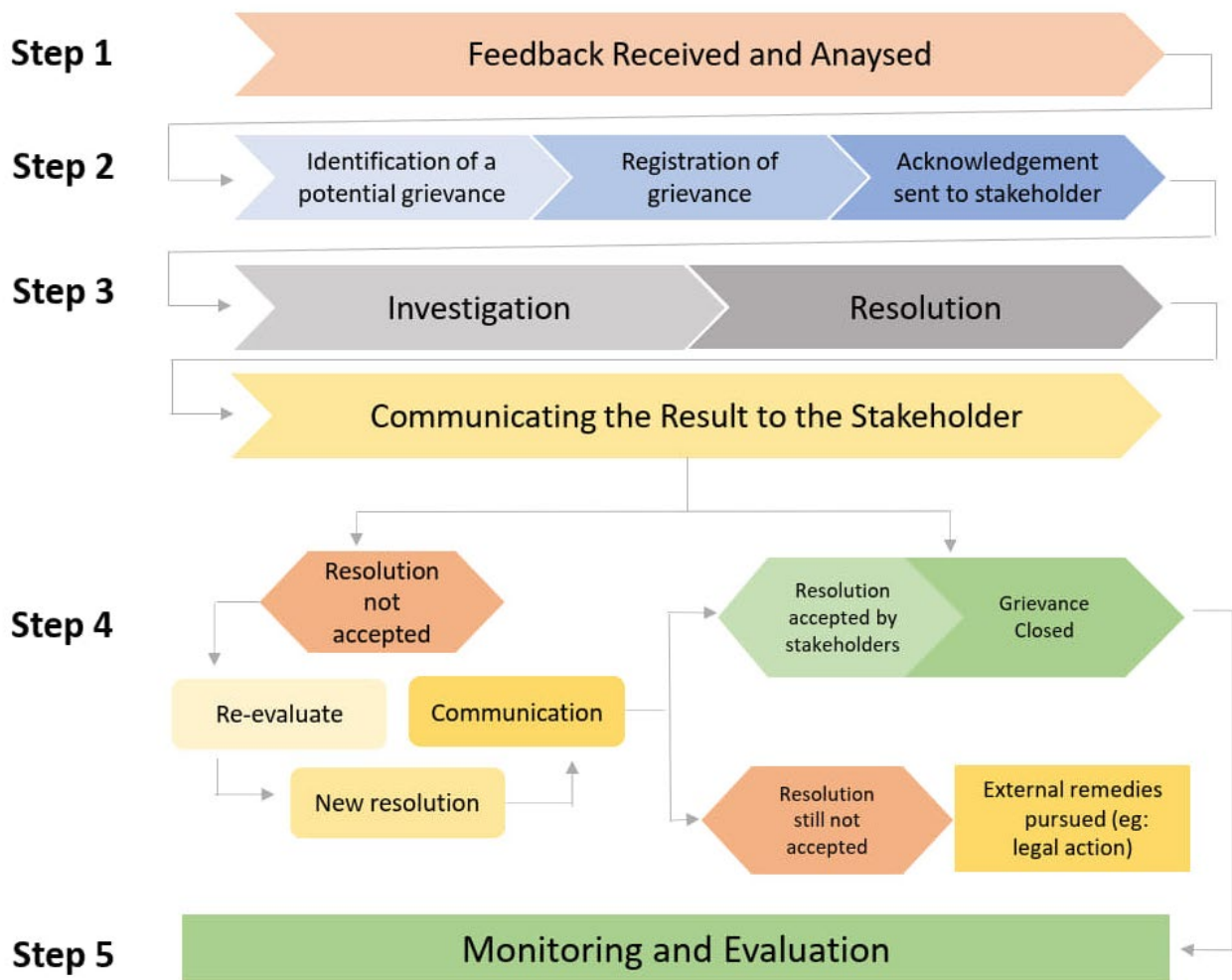


Figure 18: GRM Diagram

A separate, but similar internal grievance procedure is implemented for workers, including Staff, employees of TP-OTC, its contractors and sub-contractors and suppliers.

11.2 PROCESS

Social Impact Management Team is the main responsible for execution of Grievance Mechanism. Appeals Committee will oversee grievance management overall and will ensure that the grievances are resolved and monitored effectively. Grievances are managed through a software (SAP) by Social Impact Specialist and CLO to close communication with Investigation Team including TP-OTC Engagement and Communication Senior Expert, CLO, TP-OTC information office public relations staff who also acts as complaint registrar, TP-OTC environmental expert, site management representatives (onshore and offshore), contractor and supplier management representatives. These core team conducts initial assessments and involve other technical staff for resolution and response. Social Impact Specialist is responsible for following up resolution and responses. TPAO is involved in issues related to expropriation.

Employee grievances are separately managed and forwarded to human resources after registered in the software (SAP).

Step 1 – Feedback received: Stakeholders can convey their feedbacks related to the Project in many ways; verbally during a meeting, via website, email, call, or official correspondence etc. In either way, Social Management Team will ensure that it is documented, incorporated, and responded to as needed. In some cases, this process may identify a grievance. If so, Step 2 is initiated. Social Management Team will response the enquiries in five (5) business days.

Step 2 - Grievance logged: When a grievance is identified, it is officially registered in the software and given a unique identification number. Grievance Form is filled out for each grievance (Annex 3). This form consists of complainants contact information and details of the complaint. It is categorized based on the type of complaint and its severity. The main complaint issue categories are as follows³:

- Social Impact
- Environmental Impact
- Compliance Impact
- Community Security
- Human Rights

List of grievances subcategories are presented in the Annex-5.

Following the registration of the complaint, an initial response is sent to the person(s) who raised the grievance including the registration number for follow-up, acknowledging their feedback, and describing the next steps in the grievance process, time estimates for these steps and a contact person. Apart from the official mechanism, the complaints arising from the contacts are added to the log with a different code than the complaints received through the official mechanism. These complaints are also being made a part of the process with the same method.

Step 3 - Investigation and resolution: Investigation Team investigates grievances and their surrounding circumstances if necessary. These investigations are undertaken in a timely manner involving further staff and experts if necessary. The results of these investigations are reviewed, and a resolution is proposed. The development of the resolution may involve consultation with the person(s) involved and in some cases with an independent third party. Grievances regarding human rights violations, Gender Based Harassment, and wrong doings will be evaluated by Appeals Committee. The proposed resolution is then formally communicated to all parties. Social Management Team completes the process and respond to the complainant in 30 calendar days.

Step 4 - Resolution: If the resolution is accepted by all parties, it is implemented, and the grievance is closed using Grievance Closure Form (Annex 4). If the resolution is not accepted, it will be reconsidered, and a revised resolution may be proposed. The affected person(s) may choose to pursue external remedies at any time, including if an agreed resolution cannot be found.

Step 5 - Monitoring & Evaluation: After the resolution has been implemented, it is monitored, and its effectiveness will be evaluated. All parties are notified that the resolution has been implemented and have the opportunity to provide feedback on the grievance process and its implementation.

11.3 INSTITUTIONAL SET UP AND RESOURCES

Social Management Team includes the Social Impact Specialist and CLO. The team has the main responsibility of execution of the SEP and LRP, including delivery of activities and overall management of relations with stakeholders, grievance management and monitoring and evaluation. This core team is supported by Investigation Team.

Appeals Committee consisting of TP-OTC Corporate Communications Department, TP-OTC HSSE and HR management is responsible for ensuring Grievance Mechanism is effectively managed. Furthermore, the committee will directly investigate and respond grievances related to human rights violations, mobbing, Gender Based Harassment, and wrong doings (bribery, actions against business integrity principles) as well as grievances that are not closed when complainant refuses the corrective actions, or the actions are not closed on time.

³ Categories are subject to update along the process.

Action Team

- HSSE Team
- Site Management Representatives
- Onshore and Offshore Construction Team
- Contractor
- Supplier Management Representative

Appeals Committee

- Vice President
- HR Coordinator
- Corporate Communications Coordinator
- HSSE Coordinator

Social Management Team

- Social Impact Specialist
- CLO

11.4 CONTACT INFORMATION

In order to ask a question, to make a comment and to submit grievances, stakeholders may reach the Company by using following methods:

- Direct contact with CLO and Social Impact Specialist: Contact information are given in Table 22.
- Contacting the Project Information Office: Address of the office is Yeni Mah. Oktay Olcay Yurtbay Cd., 67900 Çaycuma/Zonguldak
- Grievance boxes locate in affected settlements and fishery cooperative: complaint boxes are located in Sefercik, Sazköy and Derecikören neighbourhood unit, Aşağıih saniye Mosque, Derecikören, Yeşilyayla Mosque, Gökçeler Mosque and Filyos Fishers' Shelter.
- Accessing the Project website: <https://tp-otc.com/en/contact/>

Table 22: Contact Information

Name of the Person and Title	Contact Information
Casim Can Hindioğlu Social Impact Specialist	0531 651 41 48 cchindioğlu@tp-otc.com
Şeyma Yılmaz Community Liaison Officer	0531 886 46 82 seyilmaz@tp-otc.com

12.0 MONITORING AND EVALUATION

This section of the Plan describes the steps to be taken in the implementation phases of the improvement projects identified in the LRP.

In general implementation stages will be;

- TP-OTC will monitor the performance internally and provide the results of the internal monitoring indicators monthly.
- The outcomes of the process will be monitored by the external consultant on the overall LRP implementation according to the output monitoring criteria every six months.
- An independent external consultant will do the completion audit following the completion process of the LRP.

The Company will procure the services of an external compliance auditor to review whether the LRP has been fully implemented and compliant with the IFC PS-5. The overall goal of the completion audit is to verify that the implementation of the LRP has been effective in restoring the standard of living and livelihoods of the PAPs.

The completion audit has the following objectives:

- Assess the effectiveness of measures to avoid and minimize economic displacement impacts on PAPs and fisheries.
- Verify that all entitlements and commitments described in the LRP have been delivered to affected people and fisheries.
- Control and verify if any claims or grievances have not been addressed.

The focus of the completion audit is on livelihood restoration. The evaluation methods will include quantitative surveys, which will be compared to baseline data to determine progress. The quantitative survey will be done for a sample of affected Fisheries.

The completion audit report will present the conclusions on livelihood restoration and the corrective measures required to complete the rehabilitation of affected fisheries. The audit will be carried out one year after completing the LRP implementation.

The table below represents the monitoring indicators that will be applied during the LRP implementation process.

Table 23: Monitoring Indicators for Implementation Process

Indicators	Measure	Frequency
Input Indicators		
Number of client staff/ external associated dedicated to livelihood restoration	Members of the TP-OTC implementation team Members of other departments and sectors Social workers Skill trainers Fishery consultants.	Quarterly
Output Indicators		
Number (and percentage) of beneficiaries for each determined development project	The percentage/number should be calculated from the total number of affected fishers as identified by the census/survey.	Quarterly

Indicators	Measure	Frequency
Stakeholders' expenditure for each project	Records of how much fishers spend according to each project content after project implementation (from their pocket)	Quarterly
Comparison of the expenditures made by the stakeholders before the project implementation and the expenditures made afterwards	Records of the expenditures made by the stakeholders before the project implementation and the expenditures records made afterwards	Biannually
Income level of Cooperative after project implementations	records to be kept when the projects that will generate income for the co-operative are implemented	Biannually
Number of fishers participating in trainings	Register of training participation list	Biannually
Satisfaction with projects	Conduct a survey to determine whether fishers are satisfied	Biannually

According to the implementation schedule during Phase 2 LRP implementation an external livelihood restoration external monitoring will be conducted in every 6 months. This audit will assess whether the provisions of the LRP have been met in accordance with IFC PS 5 and whether corrective action is required. Once corrective measures have been implemented to the satisfaction of the lenders, livelihoods restoration is considered completed.

The Company will monitor, maintain, and regularly update a database on the development project implementation. The Company will prepare and submit Annual Reports on activities to the government. These reports will include the progress achieved in implementing the subsequent plan.

The indicators to be taken into account for each project in the monitoring process are detailed below.

Table 24: Monitoring indicators for Monitoring Process

Indicator	Means of verification	Time of verification
The number of affected fishers and PAPs	Data collected during the survey process.	Before and after implementation of the plan
Measures for improving livelihood standards of PAPs and fisheries	Data from on-site implementation and monitoring process.	After the implementation of each determined project
The number of conflicts between PAPs, fisheries and the Project	Data received during the site monitoring process.	After the implementation of the plan
The number of conflicts between PAPs & fishers and workers before and during the restriction process	Data received during the site monitoring process.	After the implementation of the plan
The number of vulnerable PAPs and fishers faced with decreasing living standards.	Data received during the socio-economic survey and the site monitoring process.	Before and after implementation of the plan
The number of grievances registered through the grievance mechanism.	Data received from the Company.	After the implementation of the plan

Indicator	Means of verification	Time of verification
The number of grievance cases addressed.	Data received from the Company.	After the implementation of the plan
Percentage of closed grievances where PAPs indicate their satisfaction with the grievance process.	Survey of PAPs.	Quarterly
The number of persons engaged during the implementation of the Project focused on women PAPs and fishers (if any).	Data received from the Company.	After the implementation of the plan
Number of NGOs and Fishing Cooperatives involved during the implementation process.	Data received from the Company.	After the implementation of the plan
The number of beneficiaries from the livelihood improvement programmes	Data received from the Company.	After the implementation of the plan

13.0 ROLES AND RESPONSIBILITIES FOR IMPLEMENTATION

The allocated community liaison officer (CLO) at site will supervise and implement the mitigation measures stated in this LRP, under the supervision of the TP-OTC Social Impact Specialist.

TP-OTC will actively monitor the execution of the Fisheries LRP and ensure that actions are applied in accordance. Detailed roles and responsibilities are presented in below table.

Table 25: Roles and Responsibilities

Roles	Responsibilities
CLO	<ul style="list-style-type: none"> ■ Organize meetings to inform PAPs/fishers of Filyos ■ Provide information on NAVTEX restrictions ■ Prepare and distribute informative materials including leaflets, brochures ■ Ensure all Fisheries/PAPs are informed about the implementation of LRP, SEP and GRM ■ Track all engagement activities and grievances ■ Deliver all fishing related grievances to the relevant Project departments
Social Impact Specialist	<ul style="list-style-type: none"> ■ Arranging a public meeting to inform PAPs and other stakeholders to inform them about the approved livelihoods development projects ■ Delivering educational materials while making sure they reach the appropriate recipients in coordination with Çaycuma district directorate of agriculture and Fishing cooperatives.

Roles	Responsibilities
	<ul style="list-style-type: none"> ■ Receiving further supporting documentation for implementing the development projects in coordination with Çaycuma District Directorate of Agriculture and Filyos Aquaculture Cooperative ■ Reporting any complaints made by fishers under the LRP implementation ■ Reporting regularly to upper management, on the state of affairs and progress ■ Monitor compensation strategies of TEIAS ■ Assist TEIAS for the stakeholder engagement activities
HSSE Director or equivalent related unit manager	<ul style="list-style-type: none"> ■ Responsible of the effective implementation of LRP including the budget management. ■ Ensure allocation of adequate financial and human resources for effective implementation of LRP throughout the Project in line with the Project Standards. ■ Approve key stakeholder engagement strategies and local governmental stakeholders etc before LRP implementation. ■ Conduct periodic reviews of LRP implementation based on the financial and implementation monitoring reports.
TP-OTC Senior Management	<ul style="list-style-type: none"> ■ Approve the LRP (after Lender's approval). ■ Establish a PIU to implement the Project. ■ Ensure sufficient budget for defined projects and supports through national legislation and the LRP Fund. ■ Sign protocol between related institutions, if needed. ■ Provide written protocol that defines the roles, responsibilities and processes for the establishment and management of the LRP Fund. ■ Regularly monitor the LRP through the reports/ feedbacks provided from the Unit Manager.
Evaluation Committee (Consisting of local Mukhtars, Cooperative representatives, TP-OTC CLO and one additional representative from TP-OTC)	<ul style="list-style-type: none"> ■ Evaluation process, eligibility, and approval should assign "Evaluation Committee and the final budget will be approved by the Evaluation Committee ■ Ensuring alignment between, project lenders, the Government, local leaders, land affected people and other community members and fisher; ■ Overseeing ethics compliance and governance issues and ensuring that the livelihood restoration process is managed fairly and transparently and is free of corruption or bribery etc. ■ Ensuring alignment of LRP with regional and local development plans and initiatives;

Roles	Responsibilities
	<ul style="list-style-type: none"> ■ Providing an advisory role on resolving internal and external livelihood restoration issues, monitoring the budget etc.; ■ Reviewing monitoring report provided by the Project and ensuring that any issues are addressed in an efficient and effective manner; ■ Instigating independent external livelihood restoration reviews, when necessary; ■ Responding to implementation problems identified in internal and external monitoring reports; ■ Ensuring adequate information sharing with the Project representatives and the PAPs

14.0 BUDGET

14.1 Determined Livelihoods Development Projects

14.1.1 Material Storage Sheds

The material storage sheds, which were identified as the most urgent and important need for the fishers, were taken to the first place in the project implementation schedule.

With the realisation of this project, fishing nets and other materials, especially fishing nets, will be protected in a closed area. Thus, the cost of net repair or renewal, which constitutes a major expense item in every season, will be reduced.

The specifications of the sheds, which were obtained during the interviews with the fishers, are as follows;

- 33 units in total
- open front, main body made of box profile and roof made of sheet metal,
- with rain gutters made of galvanised sheet metal against corrosion,
- fully protected with anti-rust paint
- and will be built in shelter and delivered to the co-operative.

14.1.2 Portable Toilet Container

The request for the supply of a toilet container to be placed in the area to be determined by the cooperative management within the Filyos shelter and to be made available to all fishers has been included in the LRP.

When a portable toilet with a water tank is provided, cleaning and other maintenance works will be organised by the cooperative.

14.1.3 Towing System

With the towing system to be built inside the shelter, the crane costs that fisher spend for boat maintenance every season will be eliminated.

Maintenance and usage planning will be left to the co-operative management. The specifications for the towage system are as follows;

- Construction of a 5-tonne horizontal crane and skid
- 300 m² concrete platform preparation works are required.

It has been stated by the Co-operative management that the suitable area for the towing will be determined within the shelter.

14.1.4 Flake Ice Machine

It is planned that fishers will be able to preserve the fish they hunt for a long time and in a healthy condition with the supply of flake ice machine.

At the same time, in this project, which can serve all fishermen in the region and bring income to the Cooperative;

- 125 kg capacity per hour and
- it was decided that a machine to convert seawater into ice would be appropriate.

For a machine with these features, details such as seawater connection and ice storage area were planned.

14.1.5 Education Supports

During the interviews, some training programmes that were both requested by the fishers and that would enable them to be better qualified while fishing were added to this LRP.

- Co-operative management and accounting training was requested by the fishers.
- Using GPS, map reading, COLREG training,
- Fishing techniques,
- Fish marketing-sales were identified for this stage.

As these topics can be increased in time according to the needs, the above topics have been included in this LRP planning. According to the training topics, TP-OTC's internal resources and experienced employees can support or external resources can be utilised.

14.1.6 Budget for Livelihoods Development Projects

Detailed budgeting for each project has been prepared with the support of TP-OTC technical teams and according to market conditions.

Table 26: Budget for Shed Construction

CONSTRUCTION of 33 MATERIAL STORAGE SHEDS			
NO	Type of Production	Quantity	Total Cost
1	Main uprights 100x50x3 mm box profile	Appr. 8 tonnes	
2	Roof trusses 50x50x3 mm and 40x40x2,5 mm box profile		
3	Wall diagonals and roof diagonals 40x40x2,5 mm box profile		
4	Roof purlins 40x40x2,5 mm box profile		
5	Cross joint flags 10 mm sheet metal		
6	Rain gutters 100x100x100 mono galvanised sheet metal, downspouts 50 mm pvc pipe	Gutter length 200 metres, downpipe total length 140 metres	
7	Roof covering 0,50 mm trapezoidal sheet	400 m ²	

8	Anchorage of the uprights to the existing concrete will be made with 4 M12 rods and epoxy per upright	400 m ²	
9	Anchorage of the uprights to the existing concrete will be made with 4 M12 rods and epoxy per upright	136 pcs 25 cm rods, nuts and epoxy	
10	Building elements will be painted with one coat of antirust and one coat of paint		
		Total cost including materials and labour	USD 100.000

Table 27: Budget for Portable Toilet Container

PORTABLE TOILET CONTAINER			
NO	Type of Production	Quantity	Total Cost
1	Portable WC Container + Water Tank Included	1 unit	USD 5.000
		Total Cost	USD 5.000

Table 28: Budget for Towing System

TOWING SYSTEM CONSTRUCTION			
NO	Type of Production	Quantity	Total Cost
1	5 Tonne Horizontal Crane and Sledge Construction	1 unit	USD 30.000
2	Platform Preparation-300 m ² Concrete area Construction	300 m ²	USD 20.000
		Total Cost	USD 50.000

Table 29: Budget for Ice Machine

ICE MACHINE			
NO	Type of Production	Quantity	Total Cost
1	Flake Ice Machine 125kg/h capacity with sea water	1 unit	USD 25.000
		Total Cost	USD 25.000

Table 30: Budget for Training Programs



TRAINING PROGRAMS			
NO	Type of Training	Quantity	Total Cost
1	Co-operative management and accounting	1 time	USD 1.000
2	Using GPS, map reading, COLREG	1 time	USD 1.000
3	Fishing techniques	1 time	USD 1.000

4	Fish marketing-sales	1 time	USD 1.000
		Total Cost	USD 4.000

Table 31: Total Budget for this LRP

No	Project	Approximate Cost - USD
1	Shed Construction	100.000
2	Toilet Container	5.000
3	Towing System	50.000
4	Ice Machine	25.000
5	Training Programs	4.000
	Total	184.000

ANNEX 2: Grievance Closure Form

 ŞİKAYET KAPANIŞ FORMU 		Doküman No	GR.001
		Yayın Tarihi	
		Revizyon No	0
		Revizyon Tarihi	0
		Sayfa No	1
Şikayet Kayıt Numarası	GR-		
Tarih			
Şikâyetin / Talebin Özeti			
Talep edilen acil eylemleri belirtiniz			
Talep edilen uzun dönem eylemleri belirtiniz			
Tazminat talep edildi mi?	Evet () Hayır ()		
FAALİYETİN DOĞRULANMASI VE SONLANDIRILMASI			
Aşamalar	Sonlandırılma Tarihi	Sorumlu Bölüm	
1			
2			
3			
GRIEVANCE / REQUEST COMPLETION			
Notlar:			
Tarih :			
Şikayette Bulunan Kişinin; Ad, Soyad ve İmza	TPAO/TP-OTC adına; Ünvan, Ad, Soyad ve İmza		

Annex 5: Grievance Subcategories

Social Impact Sub Category	Environmental Sub Category	Compliance Impact Sub Category	Community Security Sub Category	Human Rights Sub Category
Livelihood	Natural hazards	Unauthorized clearing	Violence on site	Employee misconduct
Resettlement	Contamination - water	Third party risks	Breach of Human Rights	Vulnerability
Stakeholder engagement	Contamination - soil	Noncompliance with lender requirements	Company guards on site	Gender
Cultural heritage	Noise and dust			
Community health and safety	Landscape			
Employment	Poaching			
Workers' Health and Safety	Wildlife disturbance			
Community trust	Water quantity			
Procurement opportunities				
Damage to Animal				
Damage to House				
Damage to Land & Crop				
Access to the Lands and Resources				
Expropriation				
Damage to Infrastructure (Road etc.)				