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# CEYHAN PROPANE DEHYDROGENATION - POLYPROPYLENE PRODUCTION PROJECT

## STAKEHOLDER ENGAGEMENT PLAN

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AUGUST 2024

ANKARA

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## STAKEHOLDER ENGAGEMENT PLAN

Version	Revision	Date	Prepared By		Quality Management By	Checked By	Approved By
Draft	A.0	March 2021	Yasemin Çelikel (2U1K)		Esra Okumuşoğlu (2U1K)	D. Emre Kaya (2U1K)	
	A.1	December 2021	Buket Mesta (2U1K)		Esra Okumuşoğlu (2U1K)	D. Emre Kaya (2U1K)	
	A.2	August 2022	Şeyma Geyik (2U1K)	Onur Ali Taşkın (2U1K)	Esra Okumuşoğlu (2U1K)	D. Emre Kaya (2U1K)	Ilya Gulakov (RINA)
	A.3	October 2022	Şeyma Geyik (2U1K)	Onur Ali Taşkın (2U1K)	Esra Okumuşoğlu (2U1K)	D. Emre Kaya (2U1K)	Ilya Gulakov (RINA)
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	B.1	March 2024	Onur Ali Taşkın (2U1K)	Bethanie Thompson (RINA)	Ilya Gulakov (RINA)	Ilya Gulakov (RINA)	Teresa Cinar (RINA)
	B.2	August 2024	Onur Ali Taşkın (2U1K)	Ozlem Ozel (RINA)	Ilya Gulakov (RINA)	Ilya Gulakov (RINA)	Teresa Cinar (RINA)

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**CLIENT:**

Ceyhan Polipropilen Üretim A.Ş  
Portakal Çiçeği Sokak No:33 Yukarı Ayrancı  
Çankaya - Ankara / Turkey  
☎: +90 (312) 840 10 00  
☎: +90 (312) 442 58 16

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## ABBREVIATIONS

<b>Adana ASKİ</b>	Adana Water and Sewerage Administration
<b>BIL</b>	BOTAŞ International
<b>BOTAŞ</b>	Turkish Petroleum Pipeline Company
<b>BTC</b>	Baku-Tbilisi-Ceyhan Crude Oil Pipeline
<b>Ceyhan PDH-PP Project or the Project</b>	Ceyhan Propane Dehydrogenation (PDH)- Poly-propylene Production (PP) Facility and Jetty Project
<b>Ceyhan PP A.Ş.</b>	Ceyhan Polipropilen Üretim A.Ş.
<b>Ceyhan Petrokimya A.Ş. or Management Company</b>	Ceyhan Petrokimya Endüstri Bölgesi Yönetim A.Ş.
<b>CLO</b>	Community Liaison Officer
<b>CPIR</b>	Ceyhan Petrochemical Industrial Region
<b>DSI</b>	State Hydraulic Works
<b>EBRD</b>	European Bank for Reconstruction and Development
<b>EHS</b>	Environmental Health and Safety
<b>EIA</b>	Environmental Impact Assessment
<b>ESAP</b>	Environmental and Social Action Plan
<b>ESIA</b>	Environmental and Social Impact Assessment
<b>ESMP</b>	Environmental and Social Management Plan
<b>FI</b>	Financial Institution
<b>IFC</b>	International Finance Corporation
<b>ILO</b>	International Labor Organization
<b>MoAF</b>	Ministry of Agriculture and Forestry
<b>MoCT</b>	Ministry of Customs and Trade
<b>MoENR</b>	Ministry of Energy and Natural Resources
<b>MoEUCC</b>	Ministry of Environment, Urbanization and Climate Change
<b>MoFSS</b>	Ministry of Family and Social Services
<b>MoIT</b>	Ministry of Industry and Technology
<b>MoTI</b>	Ministry of Transport and Infrastructure
<b>METU</b>	Middle East Technical University
<b>NGOs</b>	Non-Governmental Organizations
<b>NTS</b>	Non-Technical Summary
<b>PDH</b>	Propane Dehydrogenation
<b>PDoEU</b>	Provincial Directorate of Environment and Urbanization
<b>PP</b>	Propylene Production
<b>PR</b>	Performance Requirement
<b>PS</b>	Performance Standard
<b>SEP</b>	Stakeholder Engagement Plan
<b>SPV</b>	Special Purpose Vehicle
<b>TAYSEB</b>	Toros Adana Yumurtalık Free Zone Founder and Operator Co.
<b>TOBB</b>	Turkey Union of Chambers and Commodity Exchanges
<b>TPAO</b>	Turkish Petroleum

# 1 INTRODUCTION

This document presents the Stakeholder Engagement Plan (SEP) for the Propane Dehydrogenation and Poly-propylene Production Project (the Project) located in Ceyhan, Adana. The Project will be developed by Ceyhan Polypropylene Production Corporation (the Project Company) who will be responsible for the design, construction, equipping and maintenance of the PDH-PP Facility within a construction period of 38 months (including engineering, procurement, and commissioning activities) and operation period of 49 years. The investment decision for the Project was given by a partnership whose pilot members built the current structure and established a Special Purpose Vehicle (SPV) named Ceyhan Polipropilen Production Corporation (Ceyhan PP A.Ş. or Project Company) comprising of RNS Ceyhan Petrochemical Industry Investment Corporation (51%), CYN Petrochemical Industry and Commerce Corporation (15%) and Sonatrach Petroleum Investment Corporation BV (34%). Every partner within Ceyhan PP A.Ş. shall offer their unique expertise for the development of the Project. RNS Ceyhan Petrochemical Industry Investment Corporation will provide their contribution on construction and engineering with the support of Sonatrach Petroleum Investment Corporation BV who have a strong background in long term reliable and high-quality raw material supply. Healthy, inclusive, trust-based and transparent stakeholder engagement plays a key role in the successful management of the social and environmental impacts of projects. Therefore, a functional Stakeholder Engagement Plan has been developed and will be implemented effectively to ensure the participation of all stakeholders who are directly or indirectly affected by the project, ability to influence the Project, and/or who are interested in the project results. The SEP is a public document, which presents plans for stakeholder engagement, consultation, and disclosure, and is to be updated for each phase (pre-construction, construction, operation and decommissioning) of the Project. The main goal of the SEP is to ensure that Project-affected people and other stakeholders are provided relevant, timely and accessible information so that they have an opportunity to express their views and concerns about the Project and its impacts and mitigation measures. A stakeholder engagement process helps to:

- identify and involve all potentially affected stakeholders including vulnerable groups;
- generate a good understanding of the Project amongst those that will be affected;
- identify issues early in the Project cycle that may pose a risk to the Project or its stakeholders;
- ensure that mitigation measures are appropriate (implementable, effective, and efficient);
- establish a system for long-term communication between the Project and communities that is of benefit to all parties.

The SEP also includes a Grievance Mechanism for community members and other stakeholders to raise any concerns and problems related to the Project. It must be noted that a separate and specific Resettlement Grievance Mechanism (RGM) will be established for all

issues related to compensation and displacement, the full details of which are available in the RAP/LRP. The Grievance Mechanism, which is one of the most important tools of stakeholder engagement, has also been developed within the scope of the SEP.

Stakeholder engagement is an ongoing process, and the SEP will be regularly monitored and updated throughout all stages of the Project.

This version of the SEP is related with the consultation activities of Environmental and Social Impact Assessment (ESIA) study which is being prepared for the Project. Information on the Project impacts and relevant mitigation measures is provided in detail in the ESIA report, with the summary being presented in Non-Technical Summary (NTS).

A separate SEP will be prepared for the Terminal Facility (associated facility for the Project according to the ESIA document). However, if agreed between the Project Company and SPV for the Terminal Facility, stakeholder engagement activities for the Project and the Terminal Facility might be combined in order to be effective and minimize burden on affected communities.

SEP will be published also in national language on the Project Company's website at the same time as the Final Draft ESIA Report in order to provide an opportunity for people to comment on the plans related to engagement as well as on the Project. The SEP is the responsibility of the Project Company and the Project Company is fully committed to undertaking necessary engagement activities in a manner that is consistent with international good practice as outlined in next sections.

## 2 PROJECT INFORMATION

### 2.1 Background

In line with Turkey's 2023 strategy, the Government aims to increase the gross domestic product; therefore, increasing industrial production capacity is deemed as a significant factor that contributes to this aim. As part of this strategy, there are a number of initiatives including the establishment of the Ceyhan Petrochemical Industrial Region (CPIR) with the primary aim of attracting potential investors. The overall demand in Turkey for petrochemical products is above the production capacity of the limited number of petrochemical industries; the local demand is mostly met by the imports. It is anticipated that the development of the CPIR will significantly decrease import dependency.

The main aim of the Project is to produce polypropylene by using propane as raw material. The production process will be composed of two main stages: propane dehydrogenation (PDH) and polypropylene production (PP). First step in the production process (i.e. PDH) is to convert the liquified propane into propylene. In this catalytic process, propane is used as raw material, where it is converted into propylene and hydrogen (i.e., by-product). In the second step (i.e., PP), propylene is polymerized to produce polypropylene.

The Project is aiming to create added value by:

- substituting imports with national production to contribute to Turkey's current account deficit regarding polypropylene;
- creating qualitative employment;
- contributing to the development of Turkey's plastics industry;
- contributing to Turkey's development as a petrochemical hub.

The Project is located in Ceyhan district of Adana province in the south of Turkey at the Mediterranean shore.

CPIR Port Project will also have a separate Terminal Facility comprising a jetty, a propane storage tank and relevant auxiliary facilities, in order to provide raw material for the Project. The Terminal Facility will be constructed and operated by a third-party supplier company, which will be formed under Rönnesans Holding umbrella and will solely work for the Project. Due to that reason, the Terminal Facility is considered as associated facility<sup>1</sup> in accordance to the IFC PS1 and therefore, its environmental and social impacts are assessed together with the impacts of the Project.

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<sup>1</sup> Associated facilities are defined by IFC as 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.

The location of the Project site is illustrated in Figure 2-1 while the Project site and its boundaries are shown in Figure 2-2.

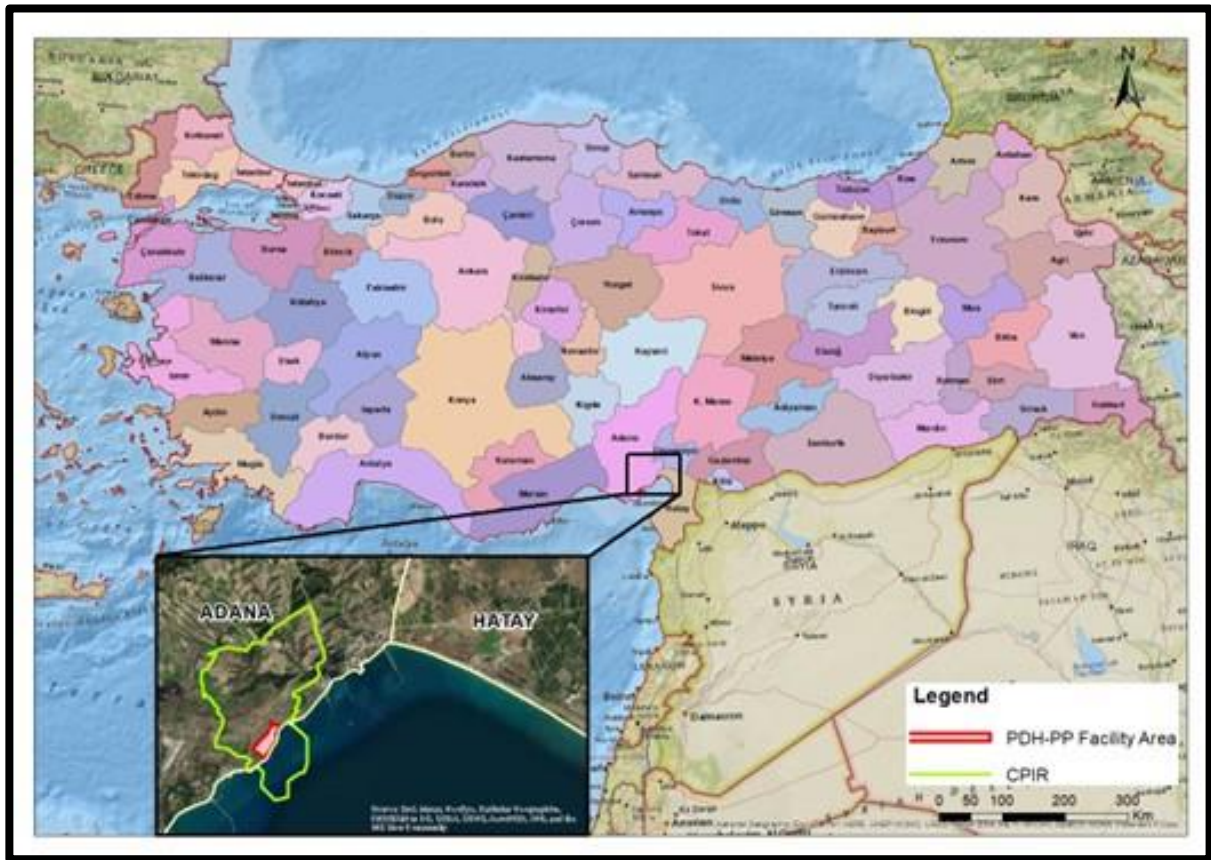
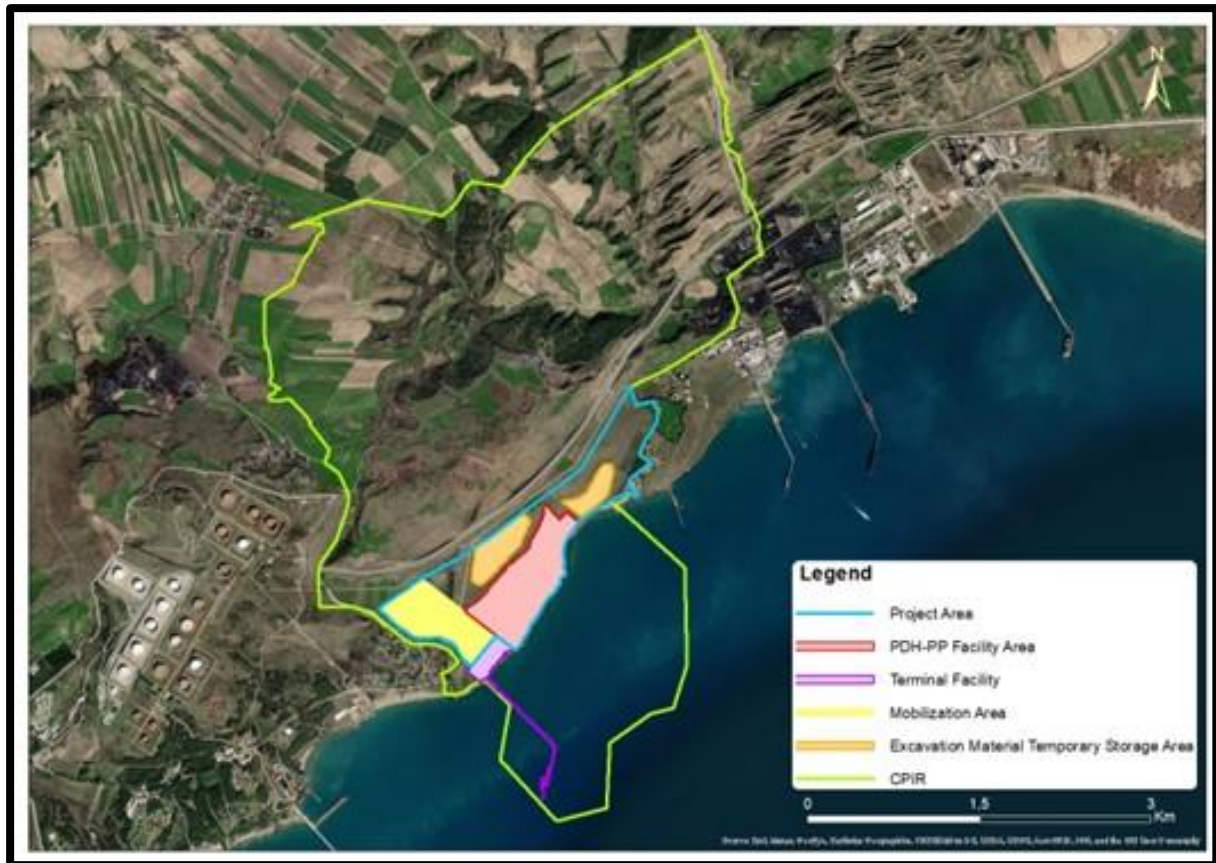


Figure 2-1 Location of the Project



**Figure 2-2** Project Site Boundary

## 2.2 Social Area of Influence

The Project is planned to be developed in the premises of Ceyhan Petrochemical Industrial Region or Ceyhan Energy Specialized Industrial Zone (CPIR) which is located in Incirli locality, Kurtpınar neighbourhood, Ceyhan district of Adana province.

The dominant land use in the surrounding area of the Project site includes industrial facilities, forestation and forest areas located approximately 1.5 km distance in the CPIR area as well as residential areas.

The closest settlement is the Kurtpınar neighbourhood with its two localities; Incirli and Karatepe. The Kurtpınar neighbourhood center is located at approximately 3.5 km northwest. The Incirli locality is approximately 50 m to the southwest of the Project site boundary and the Karatepe locality is at approximately 2.2 km to the northwest. Furthermore, Sarımazı neighbourhood of Ceyhan district and Gölovası neighbourhood of Yumurtalık district are located 6.5 km northeast and 5.1 km southwest of the Project site boundary, respectively.

Kurtpınar, Karatepe, Sarımazı and Gölovası neighbourhoods are expected to experience the potential land acquisition impacts and community health and safety impacts in addition to other

environmental and social impacts. Therefore, they are considered within the Primary Social Area of Influence.

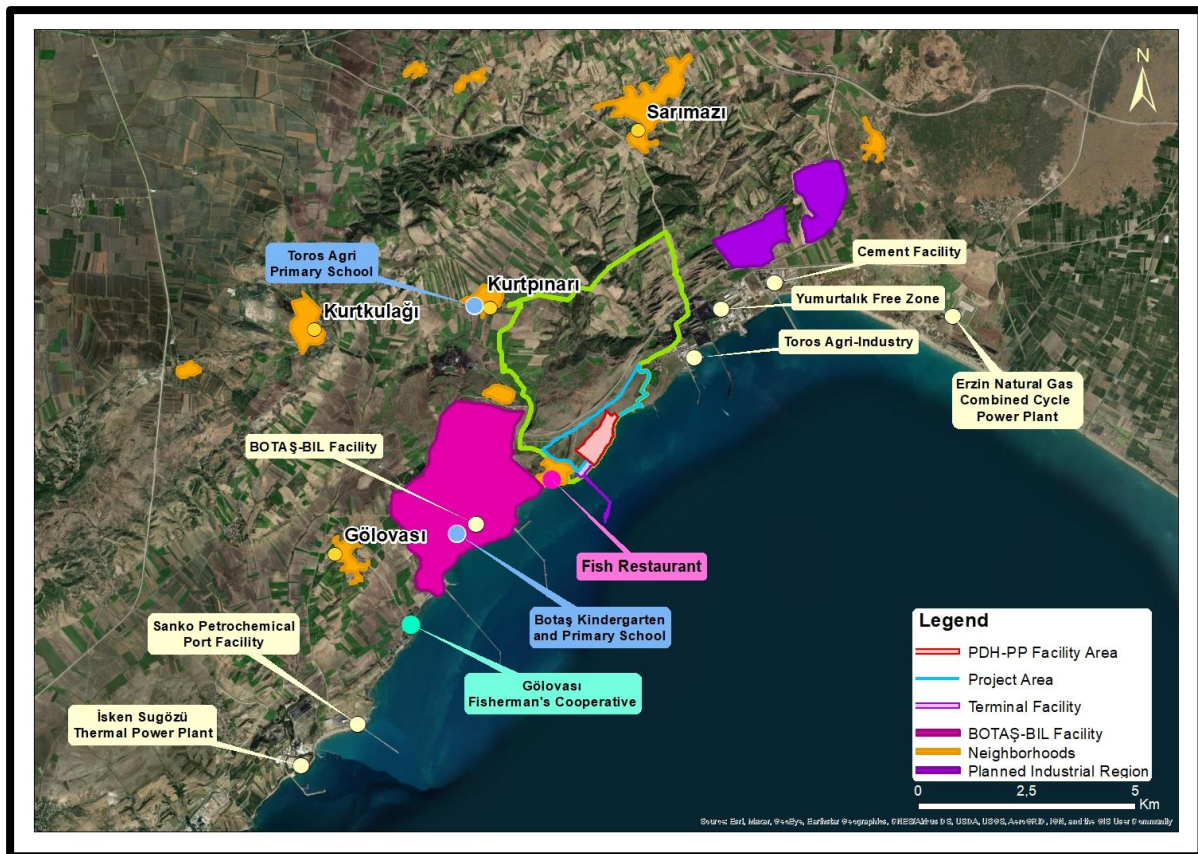
Furthermore, the overall Social Aol of the Project covers neighbourhoods within a radius of approximately 15 km in order to understand potential impacts and appropriate mitigation measures to minimize impacts that may affect local residents' life quality, e.g. stress impact caused by traffic movement, etc.). Further details on the area of influence can be found in Table 2-1 and in *Chapter 14: Socioeconomics* of the ESIA document.

**Table 2-1. Social Area of Influence**

Primary Social Area of Influence-Settlements				
Province	District	Neighbourhoods	Settlements	Description of Potential Impacts
Adana	Ceyhan	• Kurtpınar	• Incirli	Incirli is the closest settlement to the Project site. During construction and operation periods: impacts caused by dust, noise and vibration; impacts by conflicts caused by labor influx; impacts of acquisition of houses and farmland; impacts of traffic; impacts of life and fire risks; impacts of employment opportunities and local procurement are expected.
			• Karatepe, Karayılan and center of Kurtpınar	During construction and operation periods: impacts caused by dust, noise and vibration; impacts by conflicts caused by labour influx; impacts of acquisition of houses and farmland; impacts of traffic; impacts of infrastructure risks; impacts of life and fire risks; impacts of employment opportunities and local procurement are expected.
		• Kurtkulağı • Sarımaçı		During construction and operation periods: impacts by conflicts caused by labour influx; impacts of acquisition of farmland; impacts of traffic; impacts of employment opportunities and local procurement are expected.
	Yumurtalık	• Gölovası		During construction and operation periods: impacts of terrestrial and marine traffic is expected.

Primary Social Area of Influence-Businesses		
Businesses		Description of Potential Impacts
Restaurants in Incirli		The project-related activities are expected to increase business opportunities. The impacts mentioned above for Incirli settlement also apply to local restaurants.
Primary Social Area of Influence-Fishermen		
Location		Description of Potential Impacts
Fishermen in Incirli		Marine traffic and restricts may affect fishing activity.
Fishermen in Gölovası		
Primary Social Area of Influence-Affected Households and Land Users/Owners		
Households and Land Owners/Users		Description of Potential Impacts
Households in Incirli		Economic and/or physical displacement
Landowners/users in Incirli		
Primary Social Area of Influence-Facilities		
Facilities		Description of Potential Impacts
BOTAŞ Facility (BOTAŞ and Botaş International (BIL))		Traffic, pressure on infrastructure, labor influx, risk of fire can affect facilities.
TOROS Agri-Industry		
Primary Social Area of Influence-Schools		
Schools		Description of Potential Impacts
Toros Tarım Primary School		Traffic, pressure on infrastructure, labor influx, risk of fire can affect schools.
Turkish Petroleum Pipeline Company (BOTAŞ) Facility Primary School and Kindergarten		
Primary Social Area of Influence-Workers		
Project Workers (including third party workers)		Potential risks related to labour and working conditions, etc.
Secondary Social Area of Influence		
Province	District	Neighborhoods
Ceyhan	<ul style="list-style-type: none"> <li>Sağırlar</li> <li>Aydınlar</li> <li>Narlık</li> <li>Selimiye</li> <li>Hamidiy</li> <li>Çiftlikler</li> </ul>	<ul style="list-style-type: none"> <li>Erenler</li> <li>Değirmendere</li> <li>Çevretepe</li> <li>Dokuztekne</li> <li>Körkuyu</li> <li>Soğukpınar</li> <li>İmran</li> <li>Dutlupınar</li> </ul>
	Yumurtalık	<ul style="list-style-type: none"> <li>Hamzalı</li> <li>Narlıören</li> <li>Sugözü</li> </ul>
Erzin	<ul style="list-style-type: none"> <li>Yukarıburna</li> <li>Aşağıburnaz</li> <li>Turunçlu</li> </ul>	
Project Workers (including third party workers)		
Supply Chain Workers		

The locations of nearby neighbourhoods and sensitive receptors in the vicinity of the Project site are illustrated in Figure 2-3.



**Figure 2-3** Nearby neighbourhoods and sensitive receptors in the vicinity of the Project site

## 2.3 Project Schedule

Project Company is seeking finance from multinational Financial Institutions (FIs) to fund the development of the Project. Potential lenders for the Project are CESCE (The Spanish Export Credit Agency), UKEF (UK Export Finance), IFC (International Finance Corporation), DFC (U.S. International Development Finance Corporation), ING Bank and EBRD (European Bank for Reconstruction and Development). One of the requirements of these FIs for granting loans is the preparation of an ESIA Report. It has been agreed with the Project Company that the ESIA Report will be prepared to comply with the requirements of Equator Principles IV (dated July 2020), IFC's Performance Standards (PSs) on Environmental and Social Sustainability (dated January 2012) and EBRD's Performance Requirements (PRs) (dated April 2019) for key areas of environmental and social issues. In addition to the IFC PSs and EBRD PRs; IFC Environmental, Health and Safety (EHS) General Guidelines, IFC EHS Guidelines for Large Volume Petroleum-based Organic Chemicals Manufacturing, IFC EHS Guidelines for Petroleum-based Polymers Manufacturing and other relevant international guidelines as well as national legislation will be considered during the ESIA process.

Planning of the construction works of the Project is finalized in June 2022, and early works regarding site preparation, geotechnical studies and excavation works has been started in July 2022. PDH-PP Facility and Terminal Facility (The Project and associated facility) is divided in

two separate investment projects constructed by two separate investors (two SPVs). On the other hand, due to the dependency of two projects, the Project Company and SPV of the Terminal Facility agreed to construct both projects with same Engineering Procurement and Construction (EPC) Contractor. Due to these reasons, construction planning of both projects was planned in parallel, and construction works of the Project and associated facility will be performed simultaneously. According to the construction planning of EPC Contractor, same Mobilization area including with all units and temporary storage areas will be used for construction of the Project associated facility. By considering this construction planning and associated project condition of the Terminal Facility, construction impacts of both projects are collectively assessed in the ESIA Process.

This ESIA study is based on the construction schedule, both the Project and for the Terminal Facility, provided by the EPC Contractor and further illustrated in Table 2-2.

The Phase-1 Early Site Works period of the Project will last 6 months. The Phase-2 Main Construction Works period of the Project will last for 38 months (including engineering, procurement, and commissioning activities); whereas the Project Company will be responsible for the operation of the Project for 49 years. The following key activities are planned as part of the Project:

**Table 2-2.** Tentative Project schedule

Phase	Works	Duration
<b>Early Works</b>	1. Detail Engineering (Process, and Procurement Engineering)	May 2021 - October 2022
	2. Site Preparation works	July 2022 - October 2022
<b>Main EPC Works</b>	1. Detail Engineering (Process, HSE, Civil, Structure, Architecture, Mechanical, Piping, Electrical, Instrument Engineering)	March 2023 - October 2024
	2. Procurement (Mechanical, Piping, Electrical, Instrument, Structural Steel, Fire-fighting, HVAC)	April 2023 - February 2025
	4. Construction and Pre-commissioning Works	March 2023 - December 2025
	5. Terminal Facility	March 2023 - April 2026
	6. Commissioning of Terminal Facility	February 2026 - April 2026
<b>Operation</b>	Operation	Following 49 years

The construction work is proposed to be 24 hours per day in shifts and 7 days a week. Construction activities will usually be conducted at daytime, however, when it is necessary, the activities will be conducted also at night-time during construction phase of the Project. The construction site facilities (including offices, dormitory, canteen, activity hall, warehouse, utility center, education hall etc.) will be located outside the Project Area to the northeast to be used temporarily during construction phase of the Project. The mobilization area will be designed to host 4,500 workers and will have a total footprint of 193,319 m<sup>2</sup>.

## 2.4 Potential Environmental and Social Issues

The key potential environmental and social impacts of the Project were identified and assessed during the ESIA process. These key issues are outlined below:

- **Air quality:** Impacts during construction may occur as a result of dust and exhaust emissions caused by construction activities, transportation of construction materials and resources, and transport of excavated soils from outside the Project site. The operational phase impacts include exhaust air from production; ventilation of gases and fugitive emissions released from storage areas; emissions related to the power generation, if any.
- **Noise:** The Project has the potential to cause noise during construction by equipment use, piling, working vehicles and construction traffic which may affect nearby areas (e.g., residential/industrial areas and marine ecology). Potential noise during operation is related with the increase in road traffic, production units and power generation.
- **Wastewater:** Sanitary wastewater will be generated by the workers during construction and by workers/ personnel during operation. In addition, industrial wastewater will be generated in the operation phase. There will be an industrial wastewater treatment plant within the Project site to treat wastewater to be generated from production processes.
- **Blasting:** There will be blasting for 10 months during the construction phase. Air pressure, vibration and flyrock may occur in this process.
- **Waste Management:** There will be waste generation during construction activities that include excavated soils, solid wastes, construction wastes (such as steel, cables, packaging) and hazardous wastes (such as waste oil, oily rags) which will require disposal. During operation, there will be generation of domestic wastes, general hazardous wastes, wastewater sludge and chemical wastes.
- **Traffic and transport:** The increase in onshore and offshore traffic during the construction and operation phases of the Project are evaluated. Especially during the construction period, road and traffic arrangements will be made due to the transportation of heavy loads.
- **Socio-economic impacts:** As a result of the development of the Project, it is anticipated that significant decrease in import dependency for polypropylene will occur. Project will create employment opportunities and may positively affect the local businesses during construction and operation phases. On the other hand, increase of population with non-local people in the region due to construction of the Project is expected as negative impact.
- **Worker/operational personnel health and safety:** Activities during construction carry the risk of injury or damage to workers. Related to operation, impacts may occur

through exposure to hazardous materials/waste; through fire risks related to storage, handling and presence of chemicals and flammable substances.

- **Community health, safety and security:** Impacts might be associated with dust, noise and vibration generation during construction activities which may affect nearby communities. Construction impacts are also associated with increase of road traffic and workers' influx. Impacts during operation phase are related to the increase in road traffic, potential emergency situations such as chemical spills and fire related to storage, handling and presence of chemicals and production activities.
- **Cultural heritage:** Relevant impacts are associated with potential damage to the ancient waterway and chance finds.

Potential risks and impacts of the Project are analysed and assessed in detail in the ESIA document. Relevant measures to mitigate and manage impacts are determined accordingly.

## 3 NATIONAL LEGAL REQUIREMENTS AND INTERNATIONAL STANDARDS

In terms of Turkish regulatory requirements, the scope of both terrestrial and marine sections of the Project falls within the scope of the Turkish EIA Regulation. In the EIA regulation, petrochemical facilities (i.e. terrestrial section) and ports (i.e. marine section) fall under Annex I (i.e. item 29 Facilities where oil, natural gas, petrochemicals and chemicals are stored, with a total capacity of 50,000 m<sup>3</sup> and above). Therefore, the Project is subject to full EIA process.

At the time of preparation of this Report, the national EIA procedures for the Ceyhan Polypropylene Production Facility Project covering the Terrestrial Section and the Raw Material Supply, Storage and Port Facility Project (CPIR Port) that includes the Marine Section (jetty) of the Ceyhan PDH-PP Project are already completed and the EIA Positive Decisions dated 18.10.2020 were given by the MoEUCC (former MoEU). During the EIA process for the Terminal, a public participation meeting could not be held due to covid-19 restrictions.

### 3.1 National Legislation

The Turkish environmental legislation is in parallel with the EU Legislation due to the Turkey's harmonization process to EU. The baseline for the environmental impact of this Project is the Environmental Law No. 2872 (Official Gazette dated 11.08.1983 and numbered 18132). On the other hand, the EIA principles and procedures are detailed in the Environmental Impact Assessment Regulation (last version: Official Gazette dated 29.07.2022 and numbered 31907).

'The Constitution of the Republic of Turkey' is the main document related to the stakeholder engagement and consultation for the Project. The key articles of the Constitution related to stakeholder engagement are listed below:

Article 25: Freedom of Thought and Opinion – Everyone has the right to freedom of thought and opinion. No one shall be compelled to reveal his thoughts and opinions for any reason or purpose, nor shall anyone be blamed or accused on account of his thoughts and opinions.

Article 26: Freedom of Expression and Dissemination of Thought – Everyone has the right to express and disseminate his thoughts and opinion by speech, in writing or in pictures or through other media, individually or collectively. This right includes the freedom to receive and impart information and ideas without interference from official authorities.

Article 56: Health, the Environment and Housing – Health Services and Conservation of the Environment – Everyone has the right to live in a healthy, balanced environment. It is the duty of the state and citizens to improve the natural environment, and to prevent environmental pollution.

Article 63: Conservation of Historical, Cultural and Natural Wealth – The state shall ensure the conservation of the historical, cultural and natural assets and wealth, and shall take supportive and promotive measures towards that end.

Article 74: Right of Petition – Citizens and foreigners resident considering the principle of reciprocity have the right to apply in writing to the competent authorities and to the Turkish Grand National Assembly regarding the requests and complaints concerning themselves or the public.

#### CIVIL LAW NO. 4721

Real property rights and restrictions are defined under relevant section of Civil Law (Issued 08.12.2001, Official Gazette No. 24607). The provisions of the Civil Law will be considered and met in all phases of the Project.

#### LAW ON THE RIGHT TO INFORMATION NO. 4982

The Law on the Right to Information No. 4982 (Issued 24.10.2003, Official Gazette No. 25269) states that the public has the right to receive information and complain about the progress and implementation of projects. The Act is related to the activities of public institutions and organizations as well as professional organizations with public institution status. The public have to be granted, or denied, access to the requested information or document within 15-30 working days. The Act also contains public grievance procedures in case access is denied. The right to information covers the principles of equality, impartiality and openness that are the necessities of a democratic and transparent government.

#### LAW ON THE USE OF RIGHT TO PETITION NO. 4982

Turkish citizens have the right to apply in writing to the Turkish Grand National Assembly and the associated authorities with regard to the requests and complaints concerning themselves or the public according to Article 3 of said Law (Issued 01.11.1984, Official Gazette No. 3071). Foreigners resident have this right considering the principle of reciprocity and drawing up petitions in Turkish.

#### EXPROPRIATION LAW NO. 2942

The administration action of the expropriation process is done in line with said Law (Issued on 08.11.1983, Official Gazette No. 18215) according to its purpose, authorisation, procedure, reason and subject of the action.

#### REGULATION ON ENVIRONMENTAL IMPACT ASSESSMENT (EIA REGULATION) NO. 31907

The Regulation entered into law in 2014, being amended in 2016, 2017, 2019, and 2022. The Regulation sets out the procedures and principles of EIA in Turkey and the authority of the

Ministry of Environment, Urbanization and Climate Change to determine rule on the status of EIA projects or delegate this decision to local authorities. The regulation also covers provision on the topics of EIA reports, EIA procedures and processes, monitoring and inspection regimes, and effective EIA and environmental management procedures.

### 3.2 International Standards

As Ceyhan PP A.Ş. is planning to approach international financial institutions for the development of the Project, the Project needs to comply with the requirements of IFC PS 1, EBRD Environmental and Social Policy, EBRD PR 10 and Equator Principles Principle 5. IFC and EBRD are committed to stakeholder engagement that is free of manipulation, interference, coercion, and intimidation, and conducted on the basis of timely, relevant, understandable and accessible information, in a culturally appropriate format.

IFC PS1 (Assessment and Management of Environmental and Social Risks and Impacts), EBRD PR10 (Information Disclosure and Stakeholder Engagement) and Equator Principle P5 (Stakeholder Engagement) describe stakeholder engagement as an on-going process and in summary require the following:

- I. identification of stakeholders that are or could be affected by the project, as well as other parties that may have an interest in the project (affected people, communities, businesses and relevant governmental bodies, general public);
- II. ensuring that such stakeholders are appropriately engaged on environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation;
- III. outline a systematic approach to stakeholder engagement that will help the client build and maintain a constructive relationship with their stakeholders on an ongoing basis through meaningful engagement during project implementation.

EBRD requires its clients to disclose sufficient information about the risks and impacts arising from projects, engage with stakeholders in a meaningful, effective, inclusive and culturally appropriate manner and take into consideration the feedback provided through such engagement.

In summary, stakeholder engagement should start at an early stage of the ESIA process and continue throughout the Project life cycle. A grievance mechanism needs to be established as well to facilitate resolution of stakeholder's concerns and grievances about the client's environmental and social performance. According to best practice and the EBRD/IFC requirements, Ceyhan PP A.Ş. is now offering consultation opportunities for stakeholders as described in the following sections.

International funders evaluate projects according to their category based on the magnitude of potential impacts and risks. IFC, EBRD and Equator Principles III categorizations for projects

are very similar. At its current state, no Lenders have been involved in the Project; however, the view is that the Project is likely to fall into Category A. The final categorization will be confirmed at a later stage in consultation with the funders. Detailed evaluations regarding national and international requirements can be found in Chapter 4: *Scope and Methodology*.

## 4 STAKEHOLDER IDENTIFICATION

For the purposes of this SEP, a stakeholder is defined as any individual, organization or group who is potentially affected by the Project or who has an interest in the Project and its impacts. The purpose of stakeholder identification is to identify and prioritize Project stakeholders for consultation who may be affected (either directly or indirectly in positive or negative way) by the Project or who have an interest in the Project but are not necessarily directly impacted by the Project. It is important to note that stakeholder identification is an ongoing process, and thus stakeholders will continue to be identified during different stages of the Project.

Project stakeholders are divided into 3 key groups: affected parties, interested parties and vulnerable groups.

### Affected Parties

Affected parties include stakeholders that might be directly or indirectly affected by a Project. Table 4-1 below outlines all affected parties for this project, including local communities, businesses, land users and owners, households, schools, and Project workers. Affected parties for this Project will also include 41 people split between 14 households who will be resettled. Affected parties also include households and organisations affected by economic displacement, including landowners/shareholders and land users. In particular, in the course of development of the Livelihood Restoration Plan there were identified 20 affected households using land on formal and/or informal basis. In addition, a business (fish restaurant) and its employees, as well as local fishermen were identified as affected by economic displacement. Engagement activities related to people and organisations affected by physical and economic displacement are determined in the RAP and LRP respectively.

Please see Table 4-1 for further detail on Affected Parties.

**Table 4-1.** Stakeholder Groups – Affected Parties

Affected Parties	Stakeholder Type		Potential Impact on Stakeholders / Stakeholders' Interest
	Type of Exposure	Cause of Exposure	
<ul style="list-style-type: none"> <li>Local communities (Kurtpınarı, Kurtkulağı, Sarımazı, Golovası)</li> </ul>	Direct/Negative	Construction and operation period activities of the Project	Settlements that have the potential to be directly negatively affected by Project activities due to their proximity to the Project site, issues related to land acquisition, etc..
<ul style="list-style-type: none"> <li>Businesses (Cengiz Restaurant and Esentepe Kilyos Fish Restaurant)</li> </ul>	Direct/Both Negative and Positive	Construction and operation period activities of the Project	They can be affected positively in terms of local procurement and negatively in terms of potential displacement impacts.
<ul style="list-style-type: none"> <li>Fishermen in Incirli and Golovasi</li> </ul>	Direct/Negative	Marine traffic	Potential impacts might relate to limitation of marine area use, relevant safety and livelihood impacts.

Affected Parties	Stakeholder Type		Potential Impact on Stakeholders / Stakeholders' Interest
	Type of Exposure	Cause of Exposure	
<ul style="list-style-type: none"> <li>Schools (Toros Tarım Primary School and BOTAŞ Primary School and Kindergarten).</li> </ul>	Direct/Negative	Construction and operation period terrestrial traffic	It may be negatively affected by the Project activities, especially by traffic.
<ul style="list-style-type: none"> <li>Project workers;</li> <li>Supply chain and 3rd parties' workers;</li> <li>Associated Facility's direct and indirect workers.</li> </ul>	Direct/Positive	Construction and operation period activities of the Project	A positive impact is expected in terms of employment. Risks related to labour and working conditions.
<ul style="list-style-type: none"> <li>Households and organizations potentially affected by economic displacement (fish restaurant, landowners and land users, etc.)</li> </ul>	Direct/Negative	Potential economic displacement	Negative impact is expected due to economic displacement (associated with land acquisition, impacts on livelihoods)
<ul style="list-style-type: none"> <li>Households affected by physical displacement (41 people in 14 households, specifically)</li> </ul>	Direct/Negative	Potential physical displacement	Negative impact is expected due to economic and/or physical displacement (resettlement)

### Interested Parties

Interested parties include individuals, groups or institutions that will not be directly affected by the Project but whose interests might be affected. This category describes government bodies, NGOs and research or educational institutions, etc. Interested parties include authorities at national, regional and district level, and non-governmental organizations (NGOs).

A number of different interested parties have been identified for the Project with responsibilities and interests relevant to the Project and its impacts. A stakeholder database has been established including the name of the representatives and contact details of each stakeholder identified. This database will be reviewed and updated as the Project proceeds. Environmental organisations are relevant stakeholders within this Management Plan, however engagement with biodiversity representatives will be covered in the Biodiversity Management Plan.

Please see Table 4-2 for further detail on Interested Parties.

**Table 4-2.** Stakeholder Groups – Interested Parties

Interested Parties	Stakeholder Type		Potential Impact on Stakeholders / Stakeholders' Interest
	Type of Exposure	Cause of Exposure	
<ul style="list-style-type: none"> <li>Governmental Bodies</li> </ul>	Indirect	Potential involvement as per legal requirements	A positive impact is expected with taxes generated by the Project. Governmental bodies might take part in permitting process, land

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Interested Parties	Stakeholder Type		Potential Impact on Stakeholders / Stakeholders' Interest
	Type of Exposure	Cause of Exposure	
			acquisition process or arrangement of consultations with communities.
<ul style="list-style-type: none"> <li>• CPIR Management</li> </ul>	Indirect	Construction and operation period activities of the Project	Coordination on provision of infrastructure services, mitigation of impacts.
<ul style="list-style-type: none"> <li>• Other businesses in the area (BOTAŞ, TOROS etc.)</li> </ul>	Indirect	Construction and operation period activities of the Project	Positive impact is expected due to potential business opportunities. Potential negative impact is expected due to dust, noise and traffic. Potential cooperation on management of cumulative impacts.
<ul style="list-style-type: none"> <li>• Construction period contractor (EPC contractor and its subcontractors);</li> <li>• Operational period contractors (O&amp;M Company of the Project, Terminal Facility Company).</li> </ul>	Indirect	Working within the scope of the project	Positive impact is expected due to potential business opportunities.
<p>NGO's, including a selection of the following related to women's rights and vulnerable groups:</p> <ul style="list-style-type: none"> <li>• Adana Children and Women's Right Association;</li> <li>• Human Rights Association -Adana Branch;</li> <li>• Adana Young Entrepreneur and Innovation Association;</li> <li>• Adana Solution to Unemployment Association;</li> <li>• Eastern Mediterranean Civil Society Empowerment Association;</li> <li>• Adana City Council;</li> <li>• Child Labor Monitoring and Prevention Association;</li> <li>• Adana Women's Solidarity Center and Shelter Association;</li> <li>• Uçan Balon Child and Youth Association;</li> <li>• Housewives Culture and Solidarity Association;</li> </ul>	Indirect	Construction and operation period activities of the Project	Environmental, biodiversity, and social impacts of the Project (depending on NGO's field).

Interested Parties	Stakeholder Type		Potential Impact on Stakeholders / Stakeholders' Interest
	Type of Exposure	Cause of Exposure	
<ul style="list-style-type: none"> <li>Adana Provincial Coordination Board;</li> <li>Adana Ceyhan Special Education and Rehabilitation Center;</li> <li>Çukurova Special Education and Rehabilitation Center;</li> <li>Ceyhan Umut Yolu Special Education and Rehabilitation Center;</li> <li>Mavi Boncuk Special Education and Rehabilitation Center.</li> </ul>			
<ul style="list-style-type: none"> <li>Universities</li> </ul>	Indirect	Construction and operation period activities of the Project	Internship for students, employment opportunities for graduates.

### Affected and Interested Parties near the Project Site

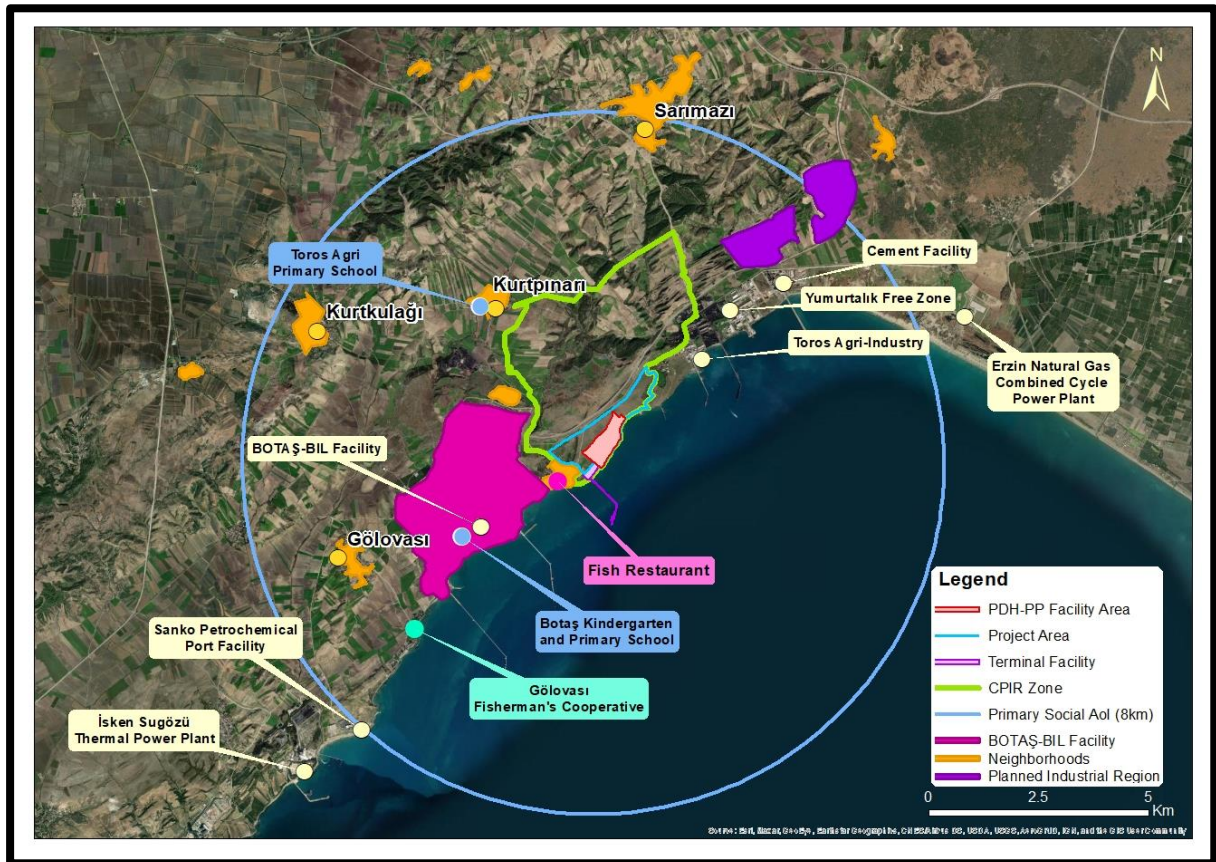
Neighbourhoods which can be affected or interested by the Project due to their location nearby the Project site and at a wider distance (within a radius of approximately 15 km to the Project area) are also considered and include 24 neighbourhoods that are subordinates of the three districts of the Adana province: Ceyhan, Yumurtalık and Erzin were identified (see Table 4-3).

**Table 4-3.** Neighbouring Settlements

District	Settlement (Neighbourhood)	
<b>Ceyhan</b>	<ul style="list-style-type: none"> <li>Kurtpınar (İncirli and Karatepe)</li> <li>Kurtkulağı</li> <li>Sarımazı</li> <li>Sağırılar</li> <li>Aydınlı</li> <li>Narlık</li> <li>Selimiye</li> <li>Hamidiye</li> <li>Çiftlikler</li> </ul>	<ul style="list-style-type: none"> <li>Erenler</li> <li>Değirmendere</li> <li>Çevretepe</li> <li>Dokuztekne</li> <li>Körkuyu</li> <li>Soğukpınar</li> <li>İmran</li> <li>Dutlupınar</li> </ul>
<b>Yumurtalık</b>	<ul style="list-style-type: none"> <li>Gölovası</li> <li>Hamzalı</li> <li>Narlıören</li> <li>Suğözü</li> </ul>	
<b>Erzin</b>	<ul style="list-style-type: none"> <li>Yukarıburna</li> <li>Aşağıburnaz</li> <li>Turunçlu</li> </ul>	

The settlements listed in Table 4-3 is considered as important stakeholders particularly due to such impacts as noise and air quality impacts and potential traffic increase.

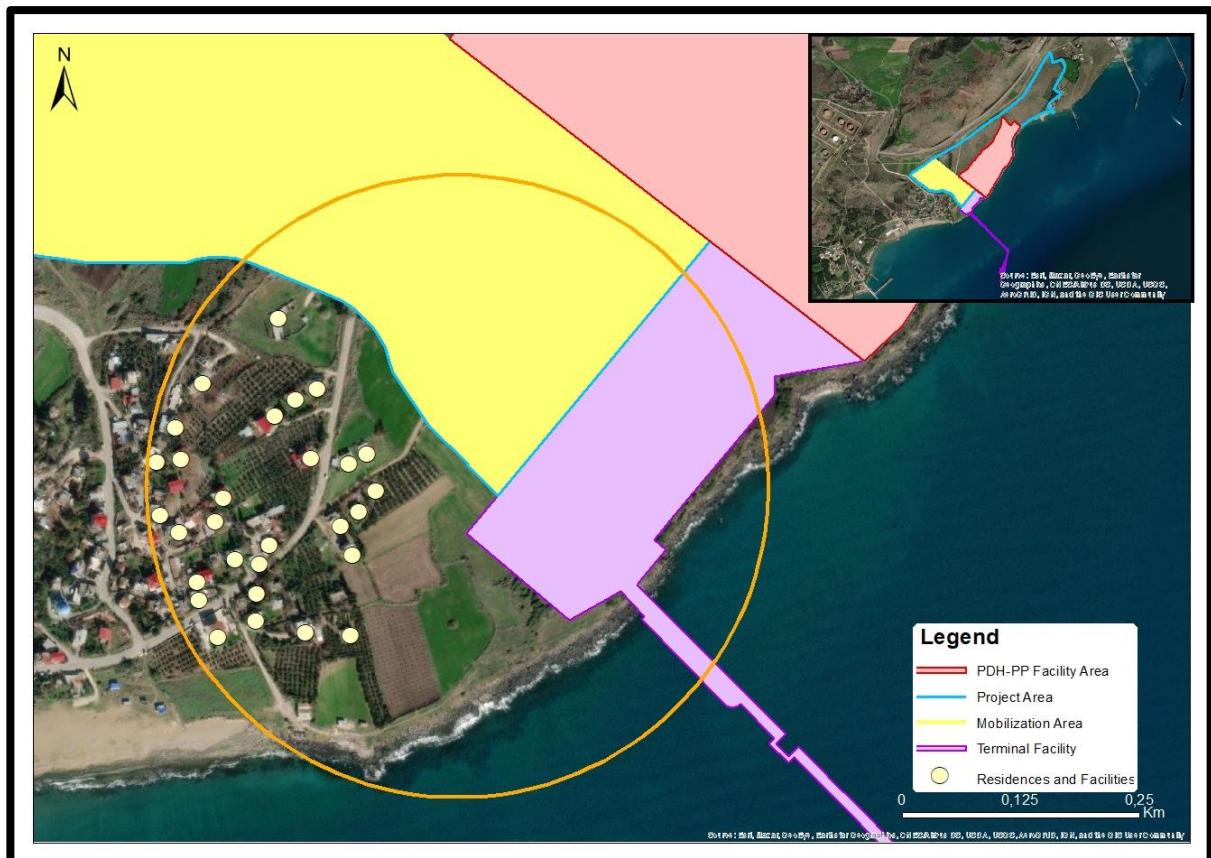
The map showing the neighbourhoods and sensitive receptors within potential Aol is given in Figure 4-1.



**Figure 4-1** Nearby neighbourhoods and sensitive receptors in the vicinity of the Project site

Among the neighbourhoods in potential Aol of the Project, the closest settlement is the Kurtpınar neighbourhood with its two localities: İncirli and Karatepe. The Kurtpınar neighbourhood centre is located at the northwest approximately 3.5 km distance. The İncirli locality is approximately 50 m to the southwest to the Project site boundary and the Karatepe locality is at approximately 2.2 km to the northwest.

In addition to the 24 localities, the public housing facilities (containing approximately 1,000 residents) that belong to BOTAŞ Facility (BOTAŞ and Botaş International (BIL)) are located to the west (approximately 1-2 km distance) of the Project site. Moreover, Toros Agri Industry (Toros Tarım) has a public housing facility (approximately 120 people in 35 houses) and a guest house (30 room capacity) which is located to the east of the Project site at 0.7 km distance. A detailed view of the land use in the immediate vicinity to the west of Project site is given in Figure 4-2.



**Figure 4-2** Closer view of land use in the close vicinity of the Project site

There are two primary schools around the Project site that may be impacted by the Project. Moreover, there are 3 university campuses located relatively in the proximity of the Project site. The Stakeholder List for Universities and Schools is presented in Appendix-B.

Governmental organizations can be grouped as national, regional, provincial, district and neighbourhood/village levels. These organizations include authorities with statutory responsibilities relevant to the Project or to environmental or social issues, and other bodies responsible for providing infrastructure relevant to the Project. A list of 78 governmental authorities relevant to the Project is given in Appendix-C.

A list of key NGOs (including women associations and public education centres) that may have an interest in environmental and social aspects of the Project is also prepared as given in Appendix-D.

The other stakeholders that might be interested and/or by the Project as they are located nearby the Project site and were not included above are listed in Table 4-4.

**Table 4-4.** Stakeholder List for Nearby Receptors

Organization	Relation to the Project
BOTAŞ Regional Directorate of Petroleum Enterprises, (BIL- BTC) Ceyhan Marine Terminal	Their views on the Project are important due to the proximity to the Project site.
Botaş Port Authority	
ASCHEM Petrochemical Industry and Trade Inc.	
ISKEN-Sugözü Power Plant	
TOROS Agriculture	
Toros-Adana-Yumurtalık Free Zone Investor A.Ş. (TAYSEB)	
Akdeniz Shipyard	
LİKİT KİMYA- Adana Yumurtalık Terminal	
Erdemoğlu Holding – SASA Petrochemical Facility	
CFS Petrochemical Istanbul	
Neighbouring businesses to the Project Site (Cengiz Restaurant and Kilyos Esentepe Fish Restaurant)	

Other nearby receptors of concern include:

- Public housing of BOTAŞ Ceyhan Marine Oil Terminal and Toros Agri-Industry;
- Users of Forestation and Forest Areas and scattered vacant lands in the potential impact area of the Project.

Furthermore, after the realisation of the planned CPIR project the project site and relevant facilities will be added to the list of nearby receptors.

### Vulnerable groups

Vulnerable groups are people who might be directly and differentially or disproportionately affected by a Project because of their disadvantaged or vulnerable status. This disadvantaged or vulnerable status may stem from an individual's or group's race, color, sex, language, religion, political or other opinion, national or social origin, property, birth, or other status (IFC PS1). Of the stakeholders within the affected party, the key primary stakeholder group will be the local communities around the Project site including neighbouring land users (particularly related to impacts during construction), those directly affected by land acquisition and the general public.

Information on vulnerable groups was obtained from the Community Level Survey with the head of neighborhoods. The criteria used for evaluating an individual or group as vulnerable was based on the IFC definition described above and included:

- Race;
- National or social origin;
- Color;
- Language;
- Age;
- Disability;

- Poverty;
- Civil Status;
- Living off the unique resources of a project area.

Overall, Adana's population is 2,263,373, which includes approximately 50.03% women and 49.97% men. There are 654,558 people under the age of 18 (28.91%) and 205,553 over the age of 65 (9.08%). The population of Ceyhan largely reflects this, with a population of 159,995, where 59.65% are women, 50.35% are men; 32.13% are under 19 and 10.51% are over the age of 65. In Adana, there are 6,800 female heads of households applying to KADEM (Women and democracy Association) for livelihood support. In Ceyhan, this number is 453. It must be noted that these numbers only reflect female heads of households experiencing financial difficulty and is therefore less than the total number of female heads of households.

61,220 people in Adana have been provided with identify cards declaring they are mentally or physically disabled. The exact number of persons with disabilities in Ceyhan is unknown, as although they are registered, they are not categorized as mentally or physically disabled.

No individuals with local hereditary genetic diseases have been identified, and so are not included in the vulnerable groups for the region listed below, nor have any Indigenous Peoples or groups within the Aol. Although there are 252,080 registered Syrian refugees in Adana and 10,983 in Ceyhan, no Syrian refugees were identified within the Project's Social Aol during the field survey and analysis of secondary data. As a result, at this time, Syrian refugees have not been included as a vulnerable group for this SEP.

Based on the above fieldwork and secondary data analysis, vulnerable groups have been categorized as follows:

- **Children:** Children may be vulnerable to project impacts in terms of their physical and cognitive health, safety, learning processes. In addition, the harm to children may be irreversible. Factors that may pose risks to children include: violence and exploitation; lack of care due to parents working full time; risks due to disruption to school and health services; difficulties in accessing personal hygiene and sanitation, especially for girls, etc. Children may be also left unattended in rural areas, which makes them particularly vulnerable to traffic risks.
- **People who are over 65 years of age:** Elderly people have limited participation in decision-making, which can lead to certain concerns they may have being overlooked;
- **People who have a chronic disorder or need special care:** During the interviews conducted with residents of Kurtpınarı, Kurtkulağı, Sarımazı, Gölovası neighborhoods in July 2022, some households contain people who have got chronic diseases[1]. In addition, there are residents who also need special care. The number of chronically diseased or people that require special care is presented in Appendix-A.

- **Disabled people:** The participation of people with mental or physical disabilities in decision-making processes may be hindered from time to time. In addition, various activities of the Project may have a greater impact on persons with disabilities.
- **People who do not have health insurance:** People who do not have health insurance are considered vulnerable since they cannot reach free or low cost treatment and medical care. The potential negative impacts on public health may affect them more.
- **People earning below the minimum wage/receiving donations from state or foundations:** People who have low income can experience adverse impacts of the Project more than other people since they have less opportunity to solve problems on their own and might require support.
- **Female-headed households:** There are women which are responsible for covering needs of their families on their own. According to researchers, women heading households are forced to play multiple, conflicting roles after losing their spouses, leaving their spouses or being alone, and have to work in marginal, part-time, informal, and low-income jobs due to lack of access to high-paying jobs (BMC Women Health, 2020). These adversities make female-headed households vulnerable.

The sources of the main impacts on vulnerable people in the region are identified as air quality, traffic density and employment opportunities. Vulnerable groups identified in communities depending on the Community Level Survey carried out are provided in Appendix-A. More detailed information on the vulnerable groups in the affected communities is provided in Section 8 of this Engagement Plan and Chapter 21 of the ESIA.

Further detail on vulnerable groups is available below in Table 4-5.

**Table 4-5.** Stakeholder Groups – Vulnerable Groups

Vulnerable Individuals or Groups	Stakeholder Type		Potential Impact on Stakeholders / Stakeholders' Interest
	Type of Exposure	Cause of Exposure	
<p>The following vulnerable groups were identified as part of the ESIA process:</p> <ul style="list-style-type: none"> <li>• Children;</li> <li>• People over 65 years;</li> <li>• People having chronic disorder or in need of special care;</li> <li>• Disabled people (mentally and/or physically);</li> <li>• People who do not have health insurance;</li> <li>• People earning below the minimum wage/receiving donations from state or foundations;</li> <li>• Female-headed households. See Appendix A and Section 14.3.8 of Chapter 14</li> </ul>	Direct or Indirect/Negative	Construction and operation period activities of the Project	Vulnerable groups might be disproportionately affected by adverse Project impacts.

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Vulnerable Individuals or Groups	Stakeholder Type		Potential Impact on Stakeholders / Stakeholders' Interest
	Type of Exposure	Cause of Exposure	
Socioeconomic of the ESIA report for more detail.			

## 5 STAKEHOLDER ENGAGEMENT APPROACH

This section provides an overview of the stakeholder engagement approach for different phases of the Project as described below:

- Phase 1: ESIA Study Consultations;
- Phase 2: Final Draft ESIA Disclosure;
- Phase 3: Construction;
- Phase 4: Operation;
- Phase 5: Decommissioning.

Phase 1 has been completed and the existing results of stakeholder engagement activities in this phase are explained in Section 6. Engagement activities for Phase 2 and Phase 3/Phase 4 are provided in Section 7 and Section 8, respectively. Ceyhan PP A.Ş. has used/will use different consultation approaches and methods for different phases of the Project activities and for different stakeholder groups. The main communication methods and mechanisms that have been and/or will be used to consult with key stakeholders in each phase are summarized in Table 5-1.

**Table 5-1.** Project Phases and Proposed Engagement Approach

Project Phase	Engagement Approach
<b>Phase 1: ESIA Study Consultations</b>	<ul style="list-style-type: none"> <li>• Sending out Project Information Documents to selected governmental and non-governmental organizations;</li> <li>• Sending out Project Information Document and Project Information Leaflet to selected neighbourhoods;</li> <li>• Newspaper advertisements of public consultation meeting;</li> <li>• Phone calls to headmen of selected neighbourhoods to inform them about the Project and invite them to the public consultation meeting;</li> <li>• Public consultation meeting;</li> <li>• Collect views through the contact details provided (mail address, e-mail, telephone number);</li> <li>• Disclosure of information in the Project website;</li> <li>• Setting up a Grievance Mechanism;</li> <li>• Phone-calls and face-to-face meetings with owner and tenant of the fish restaurant and owner of the closest parcel in Incirli neighbourhood;</li> <li>• Face-to-face meetings with selected governmental authorities;</li> <li>• Face-to-face meetings with headmen of the surrounding neighbourhoods;</li> <li>• Face-to-face meetings with the surrounding facilities;</li> <li>• Face-to-face meetings with key informants (local leaders and subject-matter experts, cooperatives, local government authorities, local Non-Governmental Organizations (NGOs) and other individuals that are able to provide specific information);</li> <li>• Face-to-face meetings and in-depth interviews with Project Affected People (PAP) and household surveys at local neighbourhoods within Aol;</li> <li>• Focus Group Discussions in Kurtkulağı and Kurtpınar Neighbourhoods;</li> <li>• Reaching out to women in Kurtkulağı and Kurtpınar Neighbourhoods.</li> </ul>
<b>Phase 2: Final Draft ESIA Disclosure</b>	<ul style="list-style-type: none"> <li>• Disclosure of Final Draft ESIA Report, ESMP, ESAP and SEP in the Project website;</li> <li>• Newspaper announcements;</li> <li>• Phone calls to headmen of selected neighbourhoods to invite them to the public consultation meeting;</li> </ul>

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Project Phase	Engagement Approach
	<ul style="list-style-type: none"> <li>• Public consultation meeting (including a dedicated slot for women);</li> <li>• Consultation with surrounding facilities;</li> <li>• Face-to-face meetings with officials of Toros Tarım Primary School;</li> <li>• Engagement with vulnerable groups, if any, through relevant headmen of the neighbourhoods;</li> <li>• Information disclosure to vulnerable groups, if any, through headmen of the neighbourhoods.</li> </ul>
<b>Phase 3: Construction</b>	<ul style="list-style-type: none"> <li>• Project website to disclose Project information and Project updates;</li> <li>• Newspaper announcements, if needed;</li> </ul>
<b>Phase 4: Operation</b>	<ul style="list-style-type: none"> <li>• Consultation with surrounding facilities during construction and operation as needed;</li> <li>• Continuous communication and consultation with relevant regulatory stakeholders and public, as necessary;</li> <li>• Implementation of a Grievance Mechanism.</li> </ul>
<b>Phase 5: Decommissioning</b>	<ul style="list-style-type: none"> <li>• Project website for the disclose of Project information and Project updates;</li> <li>• Newspaper announcements, if needed;</li> <li>• Consultation with surrounding facilities as needed;</li> <li>• Continuous communication and consultation with relevant regulatory stakeholders and public, as necessary;</li> <li>• Implementation of a Grievance Mechanism.</li> </ul>

## 6 STAKEHOLDER ENGAGEMENT ACTIVITIES UNDERTAKEN TO DATE

### 6.1 Preliminary Stakeholder Engagement Activities

Stakeholder engagement activities for the Project started during the scoping stage of the ESIA study and continued during the preparation of the ESIA report. The preliminary stakeholder engagement activities included identifying affected and interested parties and vulnerable groups, (including local authorities, NGOs, women’s association, schools, universities, settlements, and nearby facilities/receptors). As stakeholder engagement is a continuous process, although these stakeholders have been identified at this early stage, the stakeholder list (see Table 4-1 and Table 4-2) will continue to be reviewed and updated through the project lifecycle. All identified stakeholders were contacted during the ESIA study, via activities including communications with the project stakeholders using Project Information Document and leaflets, Public Consultation Meetings and preliminary face-to-face meetings for discussions with the stakeholders to gain preliminary understanding in the progress of the scoping stage. Following these preliminary activities more detailed analysis and assessments were conducted within the scope of stakeholder engagement activities and socio-economic assessment study.

At the scoping stage a Project Information Document and Project Information Leaflet was produced in English and Turkish and were sent to identified stakeholders (listed in Section 4) as the preliminary stakeholder engagement activities. Details are given in Table 6-1 below.

**Table 6-1.** Details of the Preliminary Stakeholder Engagement Activities

Stakeholder Type	Engagement Method	Key Concerns/Issues
Governmental Bodies (a total number of 78, relevant list can be found in Section 4)	Project Information Document together with a cover letter and asked to comment on the Project, its potential impacts and to provide information that may be important for the ESIA study. The letters were sent as certified mail with return receipt requested to ensure that all the letters were delivered.	<ul style="list-style-type: none"> <li>• Traffic increase and safety;</li> <li>• Rent increase due to accommodation need of people who will come from outside of the region;</li> <li>• Employment opportunities for local people;</li> <li>• Communication with locals about the progress of the Project;</li> <li>• Security of the Project site;</li> <li>• Social responsibility activities;</li> <li>• Social and environmental impacts;</li> <li>• Possible adverse impacts on agriculture;</li> <li>• Safe working environment, health and safety issues for the workers of the Project;</li> <li>• Wastewater discharge;</li> </ul>

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Stakeholder Type	Engagement Method	Key Concerns/Issues
		<ul style="list-style-type: none"> <li>• Use of cooling water (source, discharge and impacts);</li> <li>• Action plans for a possible accident, fire, earthquake, etc;</li> <li>• Marine traffic;</li> <li>• Flood Risk Preliminary Assessment;</li> <li>• Compliance with the related laws and regulations;</li> <li>• Adverse impacts on fishing activities;</li> <li>• Negative impacts on aquaculture and aquaculture resources;</li> <li>• Stakeholder expectations raised during public meetings.</li> </ul>
<p>NGOs (a total number of 63, the list of NGOs can be found in Section 4)</p>	<p>Project Information Document together with a cover letter and asked to comment on the Project, its potential impacts and to provide information that may be important for the ESIA study. The letters were sent as certified mail with return receipt requested to ensure that all the letters were delivered.</p>	<ul style="list-style-type: none"> <li>• Potential projects and facilities that may be established using the outputs (i.e., products, by-products, wastes) of the Project;</li> <li>• Increase of domestic and foreign investors in the region;</li> <li>• Development of the port sector in Turkey;</li> <li>• Protection of the marine life, environment, ecosystem in the integrated land and property security;</li> <li>• Conducting environmentally friendly activities;</li> <li>• Water consumption;</li> <li>• Wastewater parameters and discharge;</li> <li>• Cumulative impact assessment;</li> <li>• Increase in the use of plastics created by the increase in plastic supply;</li> <li>• Increase in need of propane that will be necessary for producing polypropylene and therefore continuity of imports;</li> <li>• Type of fuel to be used;</li> <li>• Measures against air pollution;</li> <li>• Hazardous and chemical waste management;</li> <li>• Handling of sludge from wastewater treatment;</li> </ul>

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Stakeholder Type	Engagement Method	Key Concerns/Issues
		<ul style="list-style-type: none"> <li>• Groundwater usage;</li> <li>• Storage of flammable materials and related measures;</li> <li>• Employment of women in the facility;</li> <li>• Contribution to vocational training in the region;</li> <li>• Prioritizing local establishments in supply chain;</li> <li>• Cooperation with local organisations for the development of the region;</li> <li>• Protection of agricultural production;</li> <li>• Development of the petrochemical industry;</li> <li>• High earthquake risk in the region;</li> </ul>
<p>Universities (a total number of 3, the list of universities can be found in Section 4)</p>	<p>Project Information Document together with a cover letter and asked to comment on the Project, its potential impacts and to provide information that may be important for the ESIA study. The letters were sent as certified mail with return receipt requested to ensure that all the letters were delivered.</p>	<p>No feedback was provided.</p>
<p>Headmen of 24 neighbourhoods (including neighbourhoods in the immediate vicinity and neighbourhoods at a wider distance within approximately 15 km as identified in Section 4)</p>	<p>A project information pack (including 5 Project Information Documents, 25 Project Information Leaflets and 25 Comment/Complaint Form) were sent together with a cover letter to headmen of 24 neighbourhoods to provide information on the planned Project and related impacts, ongoing environmental and social impact assessment and to provide opportunity to express views and concerns about the Project, and to inform how views/concerns can be submitted. The letters were sent as certified mail with return receipt requested to ensure that all the letters were delivered.</p> <p>Prior to sending the information, the headmen were contacted by phone to inform them about the aim of the project information pack and they were requested to distribute the leaflets in their neighbourhoods.</p>	<ul style="list-style-type: none"> <li>• Employment expectations;</li> <li>• Ecological impacts;</li> <li>• Concerns about environmental pollution;</li> <li>• Waste management;</li> <li>• Occupational health and safety for those who will be employed in the Project;</li> <li>• Balance between working hours and wages;</li> <li>• Benefits of the Project</li> <li>• Conducting environmentally friendly activities;</li> <li>• Recruitment of disabled people;</li> <li>• Development of the region</li> <li>• Providing sufficient; information throughout the development of the Project;</li> <li>• Economical contributions;</li> <li>• Measures for protection of the environment.</li> </ul>
<p>Project EIA Public Consultation Meeting (PCM)</p>	<p>A meeting was held on 21.01.2020 in Sarımazı's Old Municipality building in order to inform about the EIA report of the Project and to get the opinions of the public. A total of 44 people attended the meeting.</p>	<ul style="list-style-type: none"> <li>• Air pollution;</li> <li>• Air gas emissions;</li> <li>• Source of water to be used within the scope of the Project;</li> </ul>

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Stakeholder Type	Engagement Method	Key Concerns/Issues
		<ul style="list-style-type: none"> <li>• Possible impacts on regional agricultural activities;</li> <li>• Expropriation process;</li> <li>• Local employment;</li> <li>• Storage of chemicals;</li> <li>• Soil Pollution.</li> </ul>
Public Consultation Meeting	<p>A PCM was held on 6th March 2020 in Kurtkulağı Neighbourhood in Ceyhan District. The meeting location is selected based on its proximity to the Project site as well as its suitability to accommodate the potential attendees. A total of 58 people attended the PCM; including 35 people from Kurtkulağı, 8 people from Kurtpınar, 7 people from Sarımazı, 2 people from Gölovası, 2 people from Ulus, 1 person from Sağırlar, 1 person from Narlık, 1 person from Hürriyet as well as 1 delegate of Development of Tourism in Yumurtalık and Protection of Environment Association.</p> <p>The meeting was announced via advertisements in one national (25.02.2020) and one local (27.02.2020) newspaper in advance of the PCM and the advertisement was repeated at the same newspapers a week later on 02nd March 2020. The meeting was also announced from mosques to local people. Ceyhan Polipropilen A.Ş. (Project Company) representatives and HaskoningDHV TR Engineering Inc. (RHDHV-TR) initial ESIA Project team members were present during the PCM. The meeting started with a brief on the Project, including fields of use of polypropylene, given by the Project Company representatives; followed by RHDHV-TR Project team's presentation summarizing the main features of the Project and ESIA process as well as stakeholder engagement process and activities has been and to be undertaken. Photographs from the public consultation meeting and meeting notes are presented in Appendix E and Appendix F, respectively.</p>	<ul style="list-style-type: none"> <li>• Employment expectations;</li> <li>• Ecological impacts;</li> <li>• Concerns about environmental pollution;</li> <li>• Waste management;</li> <li>• Occupational health and safety for those who will be employed in the Project;</li> <li>• Balance between working hours and wages;</li> <li>• Benefits of the Project;</li> <li>• Conducting environmentally friendly activities;</li> <li>• Recruitment of disabled people;</li> <li>• Development of the region;</li> <li>• Providing sufficient information throughout the development of the Project;</li> <li>• Economical contributions;</li> <li>• Measures for the protection of the environment.</li> </ul>
Stakeholder Engagement Meeting about Early Construction Works	<p>A meeting was held in Kurtpınarı Neighbourhood on 06.07.2022 to provide information about the early works. The meeting location was selected based on its proximity to the Project, area as well as its suitability to accommodate the potential attendees. A total of 21 participants attended the meeting.</p>	<ul style="list-style-type: none"> <li>• Employment opportunities;</li> <li>• Blasting activities;</li> <li>• Grievance Mechanism;</li> <li>• Information about the resettlement process.</li> </ul>

In addition to the abovementioned activities, a social survey was conducted comprising of face-to-face meetings with the governmental authorities, headmen, Toros Tarım Primary School, nearby facilities, and focus groups, which were selected based on the interest and relevance for the Ceyhan PDH-PP Project (Project), as well as proximity to the Project site. During the social survey Project Company representatives and HaskoningDHV TR Engineering Inc. (RHDHV-TR) initial Environmental and Social Impact Assessment (ESIA) Project team Ceyhan Propane Dehydrogenation - Poly-propylene Production Project Stakeholder Engagement Plan ESIA Final Draft Report Project No: 21/003 members were present. The survey was conducted on 10-12th February 2020. Face-to-face meetings were held with the following governmental authorities:

- Adana Metropolitan Municipality;
  - Directorate of Planning and Urbanization;
  - Directorate of Environmental Protection and Control, Waste Management Branch;
  - License and Supervision Department;
  - Directorate of Planning and Urbanization;
  - Directorate of Projects;
- 6<sup>th</sup> Regional Directorate of DSI (State Hydraulic Works);
- Adana Regional Board Directorate of Cultural Assets Protection;
- Ceyhan Municipality;
- Adana Water and Sewerage Administration – Adana ASKİ;
- Adana Provincial Directorate of Environment, Urbanization and Climate Change (Adana PDoEUCC).

Furthermore, three (3) neighbourhoods (Kurtpınar, Kurtkulağı and Sarımazı) were selected to conduct face-to-face meetings based on their proximity to the Project site and high potential to be impacted by the Project development. It is worth to mention that the Kurtpınar headman is the responsible local authority for Kurtpınar centre, İncirli, Karatepe and Karayılan localities.

Focus group discussions (FGDs) were organized in Kurtpınar and Kurtkulağı neighbourhoods with the participation of the headmen and residents (20 residents from Kurtkulağı neighbourhood and 4 residents from Kurtpınar neighbourhood). Women have also raised their concerns and recommendations during the FGDs; they preferred to attend to the FGDs together with the men; therefore, no separate session was organized for women. The reason for this is that women stated that they play a similar role to men in the decision-making process and they therefore do not prefer the idea of conducting separate meetings. However, women's opinions have been nevertheless considered as part of stakeholder engagement process. In particular, during the focus group discussions, women provided general information about the region and expressed their concerns related to communities and the Project.

The issues raised by the women during the FGDs are as follows:

- Young adults who maintain their lives by conducting fishing activities in the neighborhood are uncomfortable with hunting prohibitions;
- The trees on the site were moved, but many trees were damaged because they were not moved properly and carefully;
- The facilities to be built might affect livestock;
- Compensations provided for houses and land plots are insufficient, and there are also landowners who have not yet received compensations.

Women stated that there were no issues related to discrimination, violence or harassment against women in the region.

A meeting was held on 6<sup>th</sup> March 2020 with Gölovası neighbourhood headman, who is also in charge of the S.S.S. Gölovası Neighbourhood Aquaculture Cooperative. The key issues that were raised during the face-to-face meetings with governmental authorities, headmen and Toros Tarım Primary School, neighbouring facilities, S.S.S. Gölovası Neighbourhood Aquaculture Cooperative and during PCM are presented in the Table 6-2 below.

**Table 6-2.** Outcomes of the face-to-face meetings with the interested and affected stakeholders

Stakeholder	Key Issues Discussed
<ul style="list-style-type: none"> <li>• Adana Metropolitan Municipality</li> <li>• Directorate of Planning and Urbanization</li> <li>• Directorate of Environmental Protection and Control, Waste Management Branch</li> <li>• License and Supervision Department</li> <li>• Directorate of Planning and Urbanization</li> <li>• Directorate of Projects</li> <li>• 6<sup>th</sup> Regional Directorate of DSI (State Hydraulic Works)</li> <li>• Adana Regional Board Directorate of Cultural Assets Protection</li> <li>• Ceyhan Municipality</li> <li>• Adana Water and Sewerage Administration – Adana ASKİ</li> <li>• Adana Provincial Directorate of Environment and Urbanization (Adana PDoEU)</li> </ul> <p>(10-12<sup>th</sup> February 2020)</p>	<ul style="list-style-type: none"> <li>• Zoning plans for the region;</li> <li>• Waste disposal sites;</li> <li>• Status of cultural assets within and in the vicinity of the Project site;</li> <li>• Port reception facilities in Yumurtalık Bay;</li> <li>• Standards for Deep-sea discharge and natural capacity of Yumurtalık Bay to handle deep sea discharge;</li> <li>• Groundwater and surface water sources in the region;</li> <li>• Ongoing water supply projects/studies;</li> <li>• DSI's view on provision of secure and reliable water both for communal and industrial use;</li> <li>• Wastewater collection and treatment utilities in the region;</li> <li>• Complaints about the industrial facilities operating in the region;</li> <li>• Air quality monitoring in the region;</li> <li>• Marine accidents and emergency drills in the region.</li> </ul>

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Stakeholder	Key Issues Discussed
<ul style="list-style-type: none"> <li>• Headmen of the Affected Kurtpınar, Kurtkulağı and Sarımaçı Neighbourhoods</li> <li>• FGD in Kurtpınar and Kurtkulağı Neighbourhoods</li> <li>• Toros Tarım Primary School</li> </ul> 10-12 <sup>th</sup> February 2020	<ul style="list-style-type: none"> <li>• Demographic information of the neighbourhoods;</li> <li>• Job opportunities during both construction and operation phases of the Project;</li> <li>• Providing vocational training courses to educate the local communities to be employed in the Project;</li> <li>• Heavy traffic in the region;</li> <li>• Complaints/concerns related to the existing environmental conditions (e.g., dust, quality of water courses, etc.);</li> <li>• Concerns related to expropriation of land conducted by MoIT within the CPIR Project site, outside of Ceyhan PDH-PP Project site.</li> </ul>
Neighbouring Facilities to the Project Site (10-12 <sup>th</sup> February 2020)	<ul style="list-style-type: none"> <li>• Technical/operational and environmental and social background information on the facilities and public housings/schools;</li> <li>• Environmental and social monitoring studies conducted in the region;</li> <li>• Marine traffic;</li> <li>• Emergency drills, fire safety, and accident management;</li> <li>• Ongoing stakeholder engagement activities;</li> <li>• Experiences on the region/operational activities;</li> <li>• Heavy traffic in the region;</li> <li>• Complaints/concerns related to the existing environmental conditions (e.g., dust, quality of water courses, etc.);</li> <li>• Future developments in the region.</li> </ul>
S.S.S. Gölovası Neighbourhood Aquaculture Cooperative (06.03.2020)	<ul style="list-style-type: none"> <li>• The restriction of coastal fishing activities;</li> <li>• Increase of time spent for round trips by fishermen.</li> </ul>

Additional feedbacks received regarding the Project through different channel of communication means can be found in Table 6-3 below.

**Table 6-3.** Additional feedbacks received from the Stakeholders during the initial ESIA Study

Stakeholder	Contact Method	Key Issues Discussed
Owner of fish restaurant Landowner of the closest parcel in İncirli neighbourhood	Phone Call	<ul style="list-style-type: none"> <li>• Information on the fish restaurant (including capacity, customer detail, purpose of use, income/profits, etc.);</li> <li>• Concerns related to maintaining the business continuity;</li> <li>• Information on the use of the land parcel by the residents;</li> <li>• Concerns related to expropriation of land conducted by MoIT (especially on land prices, emotional/ sentimental value of land and houses; income are the main issues);</li> <li>• Need for local employment opportunity.</li> </ul>
Participants of the Public Consultation Meeting (PCM) was held on 6 <sup>th</sup> March 2020 in Kurtkulağı Neighbourhood of Ceyhan District	PCM	<ul style="list-style-type: none"> <li>• Environmental concerns/potential adverse impacts;</li> <li>• Potential adverse impacts on the nearby communities and community health and safety concerns related with the development of the Project;</li> <li>• Impacts of political discrepancy on raw material supply;</li> <li>• Effect of cooling water use/supply on the marine environment;</li> <li>• Planned volume of workforce during construction and operation phase of the Project and need for local employment opportunity;</li> <li>• Social responsibility activities planned by the Project Company.</li> </ul>

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Stakeholder	Contact Method	Key Issues Discussed
Governmental Bodies <sup>2</sup>	Response letters	<ul style="list-style-type: none"> <li>Traffic increase and safety;</li> <li>Rent increase due to shelter need of people who will come from outside of the region;</li> <li>Employment opportunities for local people;</li> <li>Informing people about the progress;</li> <li>Security of the Project site;</li> <li>Social responsibility activities;</li> <li>Social and environmental impacts;</li> <li>Possible adverse impacts on agriculture;</li> <li>Safe working environment, health and safety issues for the workers of the Project;</li> <li>Wastewater discharge;</li> <li>Use of cooling water (supply, discharge and impacts);</li> <li>Action plans for a potential accident, fire, earthquake, etc.;</li> <li>Marine traffic;</li> <li>Flood Risk Preliminary Assessment;</li> <li>Compliance with the related laws and regulations;</li> <li>Adverse impacts on fishing activities;</li> <li>Negative impacts on aquaculture and aquaculture resources;</li> <li>Expectations that were raised in public meetings.</li> </ul>
NGOs	Response Letters	<ul style="list-style-type: none"> <li>Increase in traffic and relevant safety issues;</li> <li>Rent increase due to accommodation need of people who will come from outside of the region;</li> <li>Employment opportunities for local people;</li> <li>Distribution of Information to public about the progress;</li> <li>Security of the Project site;</li> <li>Social responsibility activities;</li> <li>Social and environmental impacts;</li> <li>Possible adverse impacts on agriculture;</li> <li>Safe working environment, health and safety issues for the workers of the Project;</li> <li>Wastewater discharge;</li> <li>Use of cooling water (supply, discharge and impacts);</li> <li>Action plans for a possible accident, fire, earthquake, etc.;</li> <li>Marine traffic;</li> <li>Flood Risk Preliminary Assessment;</li> <li>Compliance with the related laws and regulations;</li> <li>Adverse impacts on fishing activities;</li> <li>Negative impacts on aquaculture and aquaculture resources;</li> <li>Expectations that were raised in public meetings.</li> </ul>
Local Public 10-12th February 2020	Feedback Forms Collected During Face-to-face Meetings	<ul style="list-style-type: none"> <li>Employment expectations;</li> <li>Ecological impacts;</li> <li>Concerns about environmental pollution;</li> <li>Waste management;</li> <li>Occupational health and safety for those who will be employed in the Project;</li> <li>Balance between working hours and wages;</li> </ul>

<sup>2</sup> Adana Metropolitan Municipality, Directorate of Planning and Urbanization, Directorate of Environmental Protection and Control, Waste Management Branch (License and Supervision Department, Directorate of Planning and Urbanization, Directorate of Projects), 6<sup>th</sup> Regional Directorate of DSI (State Hydraulic Works), Adana Regional Board Directorate of Cultural Assets Protection, Ceyhan Municipality, Adana Water and Sewerage Administration – Adana ASKI, Adana Provincial Directorate of Environment and Urbanization (Adana PDoEU).

Stakeholder	Contact Method	Key Issues Discussed
		<ul style="list-style-type: none"> <li>• Benefits of the Project;</li> <li>• Conducting environmentally friendly activities;</li> <li>• Recruitment for disabled staff;</li> <li>• Development of the region;</li> <li>• Providing sufficient information throughout the development of the Project;</li> <li>• Economical contributions;</li> <li>• Measures for protection of the environment.</li> </ul>

The issues raised during the discussed above consultations have been reflected during preparation of the ESIA report. In particular, the ESIA covers issues related to labour and working conditions and employment opportunities, traffic, waste management, land acquisition, air quality, etc. These issues are covered in relevant chapters of the ESIA document, with the assessment of relevant impacts being made and measures to mitigate adverse impacts and enhance positive impacts being provided accordingly.

The letter dated 15.05.2020 sent by the General Directorate of Environmental Impact Assessment, Permit and Inspection of the Ministry of Environment and Urbanisation stated that the Public Participation Meeting will not be held regarding the Terminal Facility, and that the national EIA submitted should be disclosed. Based on this letter, no public participation meeting has been organised for the Terminal Facility planned to be built by Ceyhan Petrokimya Endüstri Bölgesi Yönetim A.Ş. Following the approval of the EIA Report, it was disclosed on the MoEUCC website (<http://eced.csb.gov.tr/jsp/ek1/29631>).

## 6.2 Follow-up Stakeholder Engagement Activities Completed to Date

Following the Phase-1 preliminary stakeholder engagement activities at the early stage of the ESIA procedure further social assessment studies and stakeholder engagement activities were conducted to fulfil the gaps and improve initial ESIA in line with the revisions in the project design in progress so as to finalise the Draft ESIA in line with the FIs' comments and requirements. Within that scope Project community level assessments were conducted on July 5-10, 2021, for verification or supplementation, where existing data were insufficient.

The methodology followed for the detailed stakeholder engagement and social assessment included a two-stage baseline assessment study followed by an analysis of potential sensitivities, impacts and benefits from the Project.

Primary data collection and communication was done through Project community level assessments and meetings conducted on July 5th-10th, 2021, by a specialised study team. These activities included:

- Household surveys (in Gölovası, Kurtpınar/İncirli, Kurtpınar/Karatepe, Kurtpınar/Merkez, Kurtpınar/Karayılan, Kurtkulağı, Sarımazı neighbourhoods);

- Community Level Surveys with Mukhtars of the Aol;
- Key Informant Interviews with local Non-Governmental Organisations (NGOs), affected / interested cooperatives, authorities and organizations;
- Focus group discussions with local women from specific demographic groups (i.e., young, elderly, unemployed and widow women) in the Aol;
- In-depth interview with the Project Affected People.

In that context, the field study that was conducted using quantitative and qualitative data collection techniques in the Social Area of Influence included the interview and surveys listed in Table 6-4.

**Table 6-4.** Surveys and interviews conducted by 2U1K

Type of Survey/ Interview	Number of Surveys/Interviews/ Meetings
Household Interviews	223
Community Level Interviews	4
Key Informant Interviews (KIs)	12
Focus Group Discussions	2

Data collected from the on-site survey was supported with regional and national statistics, newspaper archives and project documents. Furthermore, feedback received from the stakeholders during the preliminary stakeholder engagement activities including a Public Consultation Meeting (PCM) conducted on 6th March 2020 in a coffee house in Kurtkulağı neighbourhood (detailed in Section 4.6.1) was also used for the planning and completion of the social assessment study and development of the Project's SEP.

The results of the Community Level Surveys and Key Informant Interviews (KIs) are given in below subsections.

### Community Level Survey

Community Level Surveys on July 5-10, 2021, with the headmen of neighbourhoods indicated that all of the interviewees are aware of the Project and information meetings and preliminary discussions that were held in these neighbourhoods by the Project Company. The regional needs, potential of labour force and perceptions towards the Project were inquired during the meetings with local headmen. The results are provided in Table 6-5 to Table 6-6.

**Table 6-5.** The needs in the region as reported by local headmen

Regional needs	Villages			
	Kurtpınar	Kurtkulağı	Sarımazı	Gölovası
Employment support/ vocational training especially for local young people	*		*	*

Regional needs	Villages			
Football ground		*		
Condolence house		*		
Office of mukhtar		*		
Social interaction areas			*	
Support for solving infrastructure issues			*	

**Table 6-6.** Potential labour force in the neighbourhoods as reported by local headmen

	Kurtpınar	Kurtkulağı	Sarımazı	Gölovası
Welder		*	*	*
Driver	*			
Repairman			*	*
Security guard		*		*
Cleaning staff	*	*	*	*
Technician		*		
Catering staff	*	*	*	*
Engineer	*			

Source: Social Field Study, 2021

Accordingly, it is possible to say that in general, semi-skilled and unqualified personnel can be employed from the local people.

**Table 6-7.** Perceptions of local headmen related to the Project

Effects	Villages			
	Kurtpınarı	Kurtkulağı	Sarımazı	Gölovası
The local economy will be positively affected by the project (Positive)		*		
Receiving logistical support from local people (Positive)		*		
Employment support for local people (Positive)	*	*	*	*
Not preferring local people in employment (Negative)				*
The project will cause environmental pollution (Negative)			*	
Negative impact on public due to being an industrial area	*			

References: Interviews with headmen

Accordingly, despite varying type of perceptions including some concerns or expectations from the Project, it is seen that all of the headmen have the expectation of new employment opportunities from the Project as given in Table 6-7.

In addition to these, regarding the local socio-economic activities and vulnerabilities, the Kurtpınarı headman reported that although olive cultivation is the main agricultural activity in İncirli locality, fishing is also common for household consumption or income generation purposes. He stated that there is a decrease in fishing activities compared to previous years, especially the BOTAŞ-BIL facility port limited the field of activity of coastal fisheries.

The headman of the Kurtkulağı neighbourhood stated that farming is a common income activity as the majority of the locals are retired. Olive cultivation is also main agricultural activity in Kurtkulağı and Sarımazı neighbourhoods and locals also breed cattle and sheep for income generation.

Although fishing seems to be the primary activity in Gölovası district, the headman of Gölovası stated that fishing is decreasing every year due to the industrial facilities nearby. The headman of Gölovası stated that due to the ports of these facilities extending to the shore, fishing activities are restricted, fishing is allowed up to a certain distance from the ports, but because this distance is too far, the costs of the sailing has increased due to increased use of diesel fuel.

### **Key Informant Interview (KII)**

Key Informant Interviews were held between July 5th and July 10th 2021, with relevant local leaders and subject-matter experts, cooperatives, local government officers, local Non-Governmental Organizations (NGOs) and other individuals that may provide specific information. Therefore, interviews were conducted with different types of stakeholders to understand opinions and suggestions from local authorities, cooperatives and organizations in broader scope. KIIs would involve specific 'deep dives' into certain topics.

The following stakeholders were interviewed within the scope of KIIs:

- Kurtkulağı Agricultural Credit Cooperative No. 2001;
- Sarımazı Agricultural Credit Cooperative No. 1953;
- Gölovası Fisheries Cooperatives;
- Mediterranean Agriculture and Citrus Workers Motor Carriers Cooperative;
- Botaş International;
- Botaş Port Authority;
- ASCHEM Petrochemical Industry and Trade Inc;
- Yumurtalık Municipality;
- Ceyhan Municipality;
- Ministry of Food, Agriculture and Livestock Ceyhan District Directorate;
- Neighbouring businesses to the Project Site

Summary of the interviews can be found in Table 6-8 below.

**Table 6-8.** Summary of key informant interviews

Name of the Institution	General information of the Institution/ Organization	Project information level and perceived potential impacts	Suggestions to increase project benefits
<p><b>Gölovası Village Aquaculture Cooperative</b></p>	<ul style="list-style-type: none"> <li>• Gölovası Village Aquaculture Cooperative founded in 2002;</li> <li>• Cooperative has 30 fisherman members;</li> <li>• There are more than 20 fishing boats;</li> <li>• No fishing ban 365 days. There is fishing ban for some species and sizes;</li> <li>• Due to the existing projects in the region, the hunting area has narrowed;</li> <li>• They hunt shrimp, lagoon, bluefish, minekop, halile, sea bass, sea bream bottom fish, bream, scorpion fish and slingshot;</li> <li>• They receive financial aid from existing projects as the hunting area is narrowed.</li> </ul>	<ul style="list-style-type: none"> <li>• The cooperative president did not attend the information meeting;</li> <li>• Inadequate level of information, looking forward to obtaining further information;</li> <li>• Wants to know the date of start of construction.</li> </ul>	<ul style="list-style-type: none"> <li>• As fishing, which is the primary source of livelihood, will be affected by the project, studies should be carried out on this issue;</li> <li>• Providing local employment in the region will be beneficial in terms of the social impact of the project.</li> </ul>
<p><b>Mediterranean Agriculture and Citrus Workers Motor Carriers Cooperative</b></p>	<ul style="list-style-type: none"> <li>• Mediterranean Agriculture and Citrus Workers Motor Carriers Cooperative founded in 2013;</li> <li>• There are 330 members of Mediterranean Agriculture and Citrus Workers Motor Carriers Cooperative;</li> <li>• 60 vehicles of the cooperative are in Ceyhan;</li> <li>• 35 workers can be transported with one vehicle;</li> <li>• They give D2 Driving service and licence to the cooperative members.</li> </ul>	<ul style="list-style-type: none"> <li>• Inadequate level of information, looking forward to obtaining further information;</li> <li>• Wants to know the date of start of construction.</li> </ul>	<ul style="list-style-type: none"> <li>• Providing local employment in the region will be beneficial in terms of the social impact of the project;</li> <li>• An agreement can be made with the cooperative for the transport of workers to the project area;</li> <li>• The cooperative can contribute to find nonskilled workers.</li> </ul>

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Name of the Institution	General information of the Institution/ Organization	Project information level and perceived potential impacts	Suggestions to increase project benefits
<b>Local Market Near Project Site</b>	<ul style="list-style-type: none"> <li>A little local market which is near the project area;</li> <li>Owner of the market used to fish;</li> <li>Due to the reduction of the number of fish they had to put an end to fishing activities.</li> </ul>	<ul style="list-style-type: none"> <li>Inadequate level of information;</li> <li>The owner did not want to attend the meeting because of the video recording during the meeting;</li> <li>Court process continues as olive trees are transferred;</li> <li>Wants to know the date of start of construction.</li> </ul>	<ul style="list-style-type: none"> <li>Providing local employment in the region will be beneficial in terms of the social impact of the project.</li> </ul>
<b>Café Near Project Site</b>	<ul style="list-style-type: none"> <li>Beach café in İncirli area, which has been working for 2 years;</li> <li>There is a camping area in the café;</li> <li>2 staff working in the café;</li> <li>Employees stay here periodically;</li> <li>Untreated wastewater is discharged to the sea next to the cafe.</li> </ul>	<ul style="list-style-type: none"> <li>Inadequate level of information, looking forward to obtaining further information;</li> <li>The area where the cafe is located is in the impact zone of several projects;</li> <li>With this project, he thinks customers will be reduced;</li> <li>They want to know the date of start of construction.</li> </ul>	<ul style="list-style-type: none"> <li>Social responsibility projects can be carried out in order to reduce the use of drugs by the youth in the region and to prevent them from turning to drugs;</li> <li>The water purification system in the region can be renewed.</li> </ul>
<b>Botas International</b>	<ul style="list-style-type: none"> <li>In 2001, BOTAŞ International (BIL) has been restructured in order to operate the BTC (Baku-Tbilisi-Ceyhan) Crude Oil Pipeline;</li> <li>BIL began loading at the Ceyhan terminal on the 2nd June 2006;</li> <li>350 workers are employed here, including blue-collar and white-collar workers.</li> </ul>	<ul style="list-style-type: none"> <li>Inadequate level of information, looking forward to obtaining further information;</li> <li>Project information form given;</li> <li>They want to know the date of start of construction.</li> </ul>	<ul style="list-style-type: none"> <li>A vocational school can be established in the region and skilled workers can be trained for the project.</li> </ul>
<b>Botas Port Authority</b>	<ul style="list-style-type: none"> <li>BOTAŞ port directorate next to the project area;</li> <li>BOTAŞ International began loading at the Ceyhan terminal on the 2nd of June 2006.</li> </ul>	<ul style="list-style-type: none"> <li>Inadequate level of information, looking forward to obtaining further information.</li> </ul>	<ul style="list-style-type: none"> <li>Providing local employment in the region will be beneficial in terms of the social impact of the project;</li> <li>Turning the caravanserai from the Ottoman period in Kurtkulağı into a</li> </ul>

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Name of the Institution	General information of the Institution/ Organization	Project information level and perceived potential impacts	Suggestions to increase project benefits
			museum would be a beneficial for the region.
<b>ASCHEM Petrochemical Industry and Trade Inc.</b>	<ul style="list-style-type: none"> <li>ASCHEM PETROCHEMICAL INDUSTRY AND TRADE INC. is the manufacturer of General-Purpose Polystyrene (GPPS) and High Impact Polystyrene (HIPS) in Turkey, established in 2000 at Adana - Yumurtalik Free Zone with the patent of USA's the most advanced Continuous Mass Polymerization License, FINA Co;</li> <li>Blue-collar workers are mostly employed from İncirli and Sarımaç;</li> <li>White collar employees are mostly from Adana city centre;</li> <li>There are 60 blue-collar and 37 white-collar employees;</li> <li>They find employees by posting advertisements on the internet and through the headman's office.</li> </ul>	<ul style="list-style-type: none"> <li>Inadequate level of information.</li> </ul>	<ul style="list-style-type: none"> <li>A vocational school can be established in the region and skilled workers can be trained for the project.</li> </ul>
<b>Yumurtalık Municipality</b>	<ul style="list-style-type: none"> <li>The majority of the population of the district is engaged in agriculture and animal husbandry;</li> <li>The main source of livelihood in coastal areas is fishing and tourism;</li> <li>Yumurtalık is a tourist destination;</li> <li>Until 2018, a kiteboard festival was being held in the region.</li> </ul>	<ul style="list-style-type: none"> <li>Inadequate level of information, looking forward to obtaining further information;</li> <li>Municipality employees follow the developments in the region from the official gazette.</li> </ul>	<ul style="list-style-type: none"> <li>Providing local employment in the region will be beneficial in terms of the social impact of the project;</li> <li>Social responsibility projects can be carried out in order to reduce the use of drugs by the youth in the region and to prevent them from turning to drugs;</li> <li>Sports fields can be built;</li> <li>The greenhouses producing bananas in the region have increased, and those whose main livelihood is affected by the project can be supported in this regard.</li> </ul>

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Name of the Institution	General information of the Institution/ Organization	Project information level and perceived potential impacts	Suggestions to increase project benefits
			<ul style="list-style-type: none"> <li>• Courses can be opened for illiterate women;</li> <li>• Job-guaranteed vocational training schools can be opened in the industrial zone.</li> </ul>
<b>Ceyhan Municipality</b>	<ul style="list-style-type: none"> <li>• Ceyhan district, where the industry is relatively developed outside the metropolitan centre, shows a sub-central feature in the region;</li> <li>• The region is very suitable for agriculture and has a lot of agricultural land;</li> <li>• Agriculture is an important source of livelihood in the region;</li> <li>• Young population is high in Ceyhan;</li> <li>• Unemployment rate is high among the young;</li> <li>• There are neighbourhoods without internet infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>• Inadequate level of information, looking forward to obtaining further information.</li> </ul>	<ul style="list-style-type: none"> <li>• Providing local employment in the region will be beneficial in terms of the social impact of the project;</li> <li>• Social responsibility projects can be carried out in order to reduce the use of drugs by the youth in the region and to prevent them from turning to drugs;</li> <li>• Sports fields can be built;</li> <li>• Job-guaranteed vocational training schools can be opened in the industrial zone.</li> </ul>
<b>Ministry of Food, Agriculture and Livestock Ceyhan District Directorate</b>	<ul style="list-style-type: none"> <li>• The region is very suitable for agriculture and has a lot of agricultural land;</li> <li>• Agriculture is an important source of livelihood in the region;</li> <li>• Young population is high in Ceyhan;</li> <li>• Unemployment rate is high among the young.</li> </ul>	<ul style="list-style-type: none"> <li>• Not at this stage as the Directorate do not have sufficient information on the Project.</li> </ul>	<ul style="list-style-type: none"> <li>• Studies can be conducted on the social and environmental impacts of the project by communicating with the district governor.</li> </ul>
<b>Agricultural Credit Cooperative No. 2001 (Kurtkulağı)</b>	<ul style="list-style-type: none"> <li>• The cooperative operates for the solidarity of the farmers in the region;</li> </ul>	<ul style="list-style-type: none"> <li>• Do not have in depth information about the Project at this stage;</li> <li>• Employment opportunities;</li> </ul>	<ul style="list-style-type: none"> <li>• No suggestions at this stage.</li> </ul>

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Name of the Institution	General information of the Institution/ Organization	Project information level and perceived potential impacts	Suggestions to increase project benefits
<b>Agricultural Credit Cooperative No. 1953 (Sarımazı)</b>	<ul style="list-style-type: none"> <li>The cooperative operates for the solidarity of the farmers in the region.</li> </ul>	<ul style="list-style-type: none"> <li>The head of cooperative has no detailed information about the Project at this stage, however looking forward to obtaining further information;</li> <li>No evident impacts are expected at this stage considering the Project related activities did not start to date.</li> </ul>	<ul style="list-style-type: none"> <li>No suggestions at this stage.</li> </ul>

### **Stakeholder Meeting about Early Works**

A stakeholder meeting was held in Kurtpinari Neighbourhood on 6th July 2022 to provide information about the early works conducted for the Project. The meeting location was selected based on its proximity to the Project area as well as its suitability to accommodate the potential attendees. A total of 21 people attended the meeting. During the meeting, information was provided about the start dates of the construction activities, and also characteristics of the Project were explained. Stakeholders were informed about local employment opportunities. It was stated that the stakeholders will be informed about the blasting activities in advance and the houses will be checked for physical integrity before the blasting starts. Information was provided about the RAP process, and the grievance mechanism was introduced.

During the meeting, stakeholders requested information on compensation for losses resulting from expropriation. The neighbourhood headman asked for support to establish a company/cooperative so that the women could sell their local materials. After the stakeholder meeting, a one-on-one consultation meeting was held with Kurtpinari neighbourhood headman.

### **Land Acquisition Gap Analysis**

In July 2022, one-on-one interviews were held with the people affected by the land acquisition within the scope of the Land Acquisition (LA) Gap Analysis. The information obtained is included in the LA Gap Analysis report. In addition, interviews with neighbourhood headmen were conducted for collecting information on vulnerable groups, etc.

### **Summary of Engagement Activities during the development of the Livelihood Restoration Plan and Resettlement Action Plan**

The land acquisition process was initiated prior to conducting the ESIA in line with international standards. This was managed by the Ministry of Industry and Technology of Turkey (MoIT) and expropriation transactions were carried out in accordance with the procedures and principles set out in Turkish legislation.

Prior to the ESIA process taking place and the development of the Livelihood Restoration Plan (LRP), the land acquisition process was conducted according to national laws. Engagement with affected persons included the following steps:

- Formal owners of land and houses/structures were informed of the expropriation process via notification letters in the post. Affected landowners were also informed that the valuation commission planned to conduct an asset inventory and determine compensation packages.
- Affected people were provided with the results of the valuation and proposed compensation. The Ministry of Industry and Technology of Turkey (MoIT) negotiated

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with each owner of the land parcels and houses/structures in person, with relevant minutes being prepared accordingly and signed by two parties.

- If negotiations failed, court proceedings were initiated by the MoIT (this was most of the case). In this case, the court assigned expert committees to determine the amount of compensation that was subsequently paid to the affected persons.
- During the interviews conducted with affected persons, some indicated that they had experienced a lack of information on the resettlement process, and therefore lack of communication. No disclosure of information and consultations with informal land users was conducted. No evidence of other forms of engagement as part of the expropriation process was available at the time of preparation of the Livelihood Restoration Plan.

In June and July 2022, a desk review of existing materials has been conducted and land acquisition gap analysis methodology for fieldwork was developed. Field work was carried out between July 25-29. Below are the activities carried out during the fieldwork:

- Community level meetings with the heads of Project affected communities including Kurtpınarı, Karatepe, Kurtkulağı and Sarımazı;
- Two interviews with the owner of the Fish Restaurant and the owner of the land and restaurant building where the restaurant is located;
- Household level interviews with affected landowners and land users;
- Representatives of 15 households affected by physical displacement (resettlement);
- Affected fishermen in İncirli and Gölovası.

In addition, during the fieldwork, PAPs were consulted on the impacts associated with land acquisition, and the grievance mechanism was introduced. During the field work, the local team also collected information on expropriation activities and evaluation processes. More detailed information on the field work activities is provided in the Livelihood Restoration Plan.

RAP fieldwork was conducted in August 2023 focusing on 14 resettlement cases. A full census (14 household) survey was carried out, and the results of the interviews are available within the Resettlement Action Plan.

During the RAP preparation field work, a focus group meeting was held with 9 women representatives of households affected by physical resettlement and owners of the houses. At the meeting, plans for resettlement and possible scenarios were discussed. More detailed information on the field work activities is provided in the Resettlement Action Plan.

## 7 STAKEHOLDER ENGAGEMENT ACTIVITIES DURING FINAL DRAFT ESIA DISCLOSURE

Stakeholder engagement activities will continue during the construction period which will then be followed by engagement activities during 49-year operation period. Consultation activities during construction and operation phases are important in order to maintain constructive relationships both with the local communities and other stakeholders. There will be a Community Liaison Officer (CLO) during construction and operation phases who will be the main contact person to handle comments and grievances. Ceyhan PP A.Ş. will be responsible for updating the SEP on a regular basis during construction and operation phases.

Planned stakeholder engagement activities will include the disclosure of the Final Draft ESIA package. The following Project documents will be disclosed in English and Turkish languages on the Project website ([www.ceyhanpp.com](http://www.ceyhanpp.com)) and in the affected communities:

- **Final ESIA Report** – consisting of main text and supplementary annexes including the ESMP;
- **Non-Technical Summary (NTS)** of the Final Draft ESIA Report;
- **Stakeholder Engagement Plan (SEP)**.

The documents will be made available to the public for review and comments for 60 days. The objective of the disclosure period is to inform the stakeholders about the Project activities, impacts, proposed mitigation, monitoring and management measures. The Project Team and the ESIA team will, in consultation with the Lenders, review the comments received during the consultation process so that relevant mitigation measures can be taken to address the concerns raised by different stakeholders.

In addition to disclosure of the documents, the following activities will be conducted:

- Press announcement will be made at the beginning of the disclosure period announcing the publication of the Final Draft ESIA Report and other documents and the commencement of the consultation phase. The advertisements will also provide information on the date and time of community meetings. Targeted notification of certain stakeholders (for example, fishermen) will be also used. The press announcement will also provide a notification for vulnerable groups (see below).
- To inform vulnerable groups, the Project Company will seek opportunity to put posters informing on information disclosure and the meetings in local health care facilities, community centers and social protection bodies, i.e. facilities that might be visited by vulnerable groups.

The press announcement will also provide information that if special assistance is needed for accessing disclosed documents or participation in the meetings, a person

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might contact the Project Company which will seek for opportunities to meet relevant needs.

- Since, during completed consultations, women requested not to conduct separate meetings for women and men, common meetings for men and women will be conducted. However, separate consultations for women might be provided under request. Information on opportunity for conducting such consultations will be outlined in the press announcement.
- Posters will be placed in affected communities in 1-2 weeks prior to the meetings to inform residents of affected communities.
- Within the disclosure period, the following consultations will be held to explain the outcomes of the ESIA study and to address questions raised (see Table 7-1):

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Table 7-1. Consultations during ESIA disclosure period

Stakeholder type	Stakeholder	Engagement Approach	Date	Venue
Community meeting	Incirli and Karatepe	<ul style="list-style-type: none"> <li>A community meeting in a venue such as a school hall or community centre, open to all relevant stakeholders.</li> </ul>	August / September 2024 (TBD)	To be defined (for example, premise of restaurant in Incirli or office premises in Mobilization Area)
Community meeting	Kurtpinari	<ul style="list-style-type: none"> <li>Introduction of the grievance mechanism for submitting grievances (including those related to concerns regarding traffic, cultural heritage and health and safety;</li> <li>Face-to-face meetings; Focus Group Discussions.</li> </ul>	August / September 2024 (TBD)	Community centre in Kurtpinari
Round table meeting	Golovasi and Incirli fishermen		To be defined	To be defined (for example, premises of fishing port)

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Stakeholder type	Stakeholder	Engagement Approach	Date	Venue
<p>NGO meetings related to human and women's rights</p>	<p>NGO's related to human &amp; women's rights, including a selection of the below relevant organisations</p> <ul style="list-style-type: none"> <li>• Adana Children and Women's Right Association;</li> <li>• Human Rights Association-Adana Branch;</li> <li>• Child Labor Monitoring and Prevention Association;</li> <li>• Adana Women's Solidarity Center and Shelter Association;</li> <li>• Uçan Balon Child and Youth Association;</li> <li>• Adana Provincial Coordination Board.</li> </ul>	<ul style="list-style-type: none"> <li>• A round table meeting;</li> <li>• Follow up face to face meetings upon request.</li> </ul>	<p>August / September 2024 (TBD)</p>	<p>To be defined accordingly</p>
<p>NGO meetings related to biodiversity</p>	<p>NGOs related to the environment and biodiversity, such as but not limited to:</p> <ul style="list-style-type: none"> <li>• Adana Environment and Consumer Protection Association;</li> <li>• Mersin Friends of Environment; Antakya Nature Conservation Association;</li> <li>• Iskenderun Nature Conservation Association;</li> <li>• Tarsus Nature Conservation, Culture and Art Association</li> <li>• Erzin Association for Conserving Environment and Historical Heritage.</li> </ul>	<ul style="list-style-type: none"> <li>• A round table meeting;</li> <li>• Face-to-face meetings upon request;</li> <li>• Site visits or audits;</li> <li>• Sharing records and reports of the area and operations;</li> <li>• Additional engagement as required by the Biodiversity Management Plan</li> </ul>	<p>August / September 2024 (TBD)</p>	<p>To be defined accordingly</p>

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This table does not include engagement activities with stakeholders affected by land acquisition and physical/economic displacement. These activities are described in the Livelihood Restoration Plan and Resettlement Action Plan.

Consultations with communities regarding emergency and response issues will be determined as part of the Emergency Preparedness and Response Plan (a standalone document) to be publicly disclosed.

Engagement with relevant stakeholders (including engagement with authorities) regarding the ancient waterway is to be conducted in line with provision of the Cultural Heritage Management Plan and the Chance Finds Procedure. Issues related to the ancient waterway might be also discussed with affected communities or other stakeholders (as necessary) as part of the meetings discussed above.

With the start of the disclosure period, comments can be submitted via following communication means:

Ceyhan Polipropilen Üretim A.Ş.

Address: Aziziye mahallesi, Portakal Çiçeği sokak, No: 33 Yukarı Ayrancı, Çankaya/ANKARA

E-mail: info.cpp@ronesans.com

Telephone: +90 312 497 3428

Community Liaison Officer (CLO)

Salih Yazar - 0 538 218 74 08

On completion of the disclosure period, the ESIA Report will be finalized by reflecting the comments received during the disclosure period where required. The Final ESIA Report will then be published on the Project website.

After completion of the ESIA process, the Project will continue to engage with the stakeholders during construction and operation of the Project. Outline plans for this are set out in the SEP.

## 8 STAKEHOLDER ENGAGEMENT ACTIVITIES DURING CONSTRUCTION AND OPERATION PHASES

Stakeholder engagement activities will continue during the construction period which will then be followed by engagement activities during the 49-year operation period. Consultation activities during construction and operation phases are important in order to maintain constructive relationships both with the local communities and other stakeholders. There will be a Community Liaison Officer (CLO) during construction and operation phases who will be the main contact person to handle comments and grievances. Ceyhan PP A.Ş. will be responsible for updating SEP on a regular basis during construction and operation phases. Although not finalized yet, planned engagement activities are briefly outlined below. The main engagement methods for different types of stakeholders are also summarized in Table 8-1.

### Construction Phase

- Project information will be disclosed at the Project website and in the Project leaflets distributed to headmen which will be updated as deemed necessary;
- A noticeboard will be kept present at the entrance of the Project site in order to share the Project information with the local people and to provide the name of site manager or Community Liaison Officer where complaints can be submitted in person, not only in writing;
- The Contractor will liaise with Toros Tarım Primary School and BOTAŞ Primary School and Kindergarten officials and students to raise awareness in relation to road safety;
- The contractor will engage in dialogue with local authorities and implement physical road safety measures in close-by neighbourhoods, particularly in the vicinity of the school;
- Meetings, as deemed necessary, with national and local authorities will continue during construction phase related to permitting and other issues;
- The stakeholder list will be updated regularly and any new stakeholder identified will be included in the list;
- While consultations will continue throughout the Project, appropriate consultation methods will be preferred for vulnerable groups or persons with special needs. For example, she/he may prefer online channels rather than going to consultation meeting. Individual preferences should be sought in this regard, and ways to make things easier should be sought. Persons with disabilities and the elderly, as well as female heads of households with special needs, should be monitored throughout their participation in consultations. If they request assistance to participate in consultations, the Project Company should make effort to assist the person. CLO will contact stakeholders by phone, e-mail, or sms to learn about the special needs of those affected by the Project and the consultation methods they prefer. Consultation

methods and channels should be announced on the Project company website. If a PAP is unable to attend the consultations, CLO can visit the person's home when necessary, or if person wishes to participate, appropriate vehicles and other resources will be provided as feasible;

- Any activities likely to cause particular disturbance (such as noisy activities etc.) to the nearby neighbourhoods will be announced through handouts to be distributed to local people via headmen offices. This information will also be provided in the Project website;
- All comments and grievances will be managed in accordance with the Grievance Mechanism described in Section 0;
- The security staff at the construction site will be informed about the Grievance Mechanism and in case a local person wants to submit a comment or grievance, the security personnel will be able to convey this person to the responsible staff;
- In order to ensure maintaining the grievance mechanism, there will be clear and visible information on the Project website and phone numbers for people to submit their grievances. In addition, phone numbers and website information will be posted on the construction site signs.

### **Operation Phase**

- The Project website will be updated to include information on operation activities and any changes in environmental policy, plans and procedures that are followed;
- The Project Company will liaise with nearby neighbourhoods and particularly with school students to raise awareness in relation to road safety;
- Ongoing meetings, as deemed necessary will be conducted with the national and local communities to inform them of any changes in project activities and related to permitting;
- The stakeholder list will be updated regularly, and any new stakeholder identified will be included in the list;
- While consultations will continue throughout the Project, appropriate consultation methods will be preferred for vulnerable groups or persons with special needs. For example, she/he may prefer online channels rather than going to consultation meeting. Individual preferences should be sought in this regard, and ways to make things easier should be sought. Persons with disabilities and the elderly, as well as female heads of households with special needs, should be monitored throughout their participation in consultations. If they request assistance to participate in consultations, the Project Company should make effort to assist the person. CLO will contact stakeholders by phone, e-mail, or sms to learn about the special needs of those affected by the Project and the consultation methods they prefer. Consultation methods and channels should be announced on the Project company website;

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- All comments and grievances will be managed in accordance with the Grievance Mechanism described in Section 0;
- The security staff at the facility will be informed about the Grievance Mechanism and in case a local person wants to submit a comment or grievance, the security personnel will be able to convey this person to the responsible staff;
- In order to inform people widely about the grievance mechanism, there will be clear and visible information on the Project website. In addition, there will be a call centre to manage the grievances.

**Table 8-1.** Engagement Methods During Construction and Operation Phases

Project Phase	Stakeholder Type	Engagement Approach	Anticipated Frequency <sup>3</sup>	Responsibility
<b>Construction</b>	Local communities including vulnerable groups and women	<ul style="list-style-type: none"> <li>• Project website for Project updates;</li> <li>• Making comment/complaint forms available in the Project website to submit grievances;</li> <li>• Noticeboard to share Project information with the local people and to provide the name of site manager or Community Liaison Officer;</li> <li>• Implementation of grievance mechanism;</li> <li>• Making comment/complaint forms available at the construction site office;</li> <li>• Face-to-face meetings with adjacent local residents/headmen/nearby facilities upon a grievance or if needed;</li> <li>• Publication of resolutions to grievances raised;</li> <li>• CLO to conduct regular face to face meetings with NGOs/community representatives to assess any impacts</li> </ul>	Quarterly or when achieving key project milestones	Ceyhan PP A.Ş. and Contractors of Ceyhan PP A.Ş.

<sup>3</sup> To be specified in the SEP to be updated annually or as needed.

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Project Phase	Stakeholder Type	Engagement Approach	Anticipated Frequency <sup>3</sup>	Responsibility
		<p>specific to vulnerable groups and women;</p> <ul style="list-style-type: none"> <li>Monitoring and recording of incidents relating to traffic, chance finds, and health and safety, and meetings with headmen/community members to share responses to incidents;</li> <li>Newspaper advertisements if needed.</li> </ul>		
	Governmental authorities	<ul style="list-style-type: none"> <li>Face-to-face meetings with authorities related to permitting issues;</li> <li>Official written correspondence with authorities.</li> </ul>	Bi-annually or as needed.	
	NGOs related to human and women's rights	<ul style="list-style-type: none"> <li>Face-to-face meetings;</li> <li>Focus group discussions;</li> <li>Implementing grievance mechanism.</li> </ul>	Bi-annually or when achieving key project milestones	Ceyhan PP A.Ş. and Contractors of Ceyhan PP A.Ş.
	NGOs related to the environment and biodiversity	<ul style="list-style-type: none"> <li>Face-to-face meetings;</li> <li>Site visits or audits;</li> <li>Sharing records and reports of the area and operations;</li> <li>Additional engagement as required by the Biodiversity Management Plan</li> </ul>	Bi-annually or when achieving key project milestones / as required by the Biodiversity Management Plan	Ceyhan PP A.Ş. and Contractors of Ceyhan PP A.Ş.
	Construction workers	<ul style="list-style-type: none"> <li>Implementation of grievance mechanism;</li> <li>Training on environmental, health and safety aspects;</li> <li>Consultation related to implementation of relevant management plans (i.e., Construction Camp Management Plan).</li> </ul>	<p>Continuous engagement as part of induction and refresher training</p> <p>/ as per the relevant management plans (Labour and Working Conditions Management Plan, Accommodation Camp Management Plan, etc.)</p>	Contractors of Ceyhan PP A.Ş.

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Project Phase	Stakeholder Type	Engagement Approach	Anticipated Frequency <sup>3</sup>	Responsibility
<b>Operation</b>	Local communities	<ul style="list-style-type: none"> <li>• Making comment/complaint forms available at the security gates;</li> <li>• Making comment/complaint forms available in the Project website to submit grievances.</li> </ul>	Annually or as needed	Service Providers of Ceyhan PP A.Ş.
	NGOs related to human and women's rights	<ul style="list-style-type: none"> <li>• Face-to-face meetings;</li> <li>• Focus group discussions;</li> <li>• Implementing grievance mechanism.</li> </ul>	Annually or as needed	Ceyhan PP A.Ş. and Contractors of Ceyhan PP A.Ş.
	NGOs related to the environment and biodiversity	<ul style="list-style-type: none"> <li>• Face-to-face meetings;</li> <li>• Site visits or audits;</li> <li>• Sharing records and reports of the area and operations;</li> <li>• Additional engagement as required by the Biodiversity Management Plan</li> </ul>	Continuous / as required by the Biodiversity Management Plan	Ceyhan PP A.Ş. and Contractors of Ceyhan PP A.Ş.
	Employees of Ceyhan PP A.Ş. (including sub-contractors and their staff)	<ul style="list-style-type: none"> <li>• Project website to disclose Project information and Project updates;</li> <li>• Newspaper announcements, if needed;</li> <li>• On-going communications with relevant regulatory stakeholders and public, as necessary;</li> <li>• Implementation of the Grievance Mechanism.</li> </ul>	Continuous engagement as part of induction and refresher training / as per the relevant management plans (Labour and Working Conditions Management Plan, etc.)	Ceyhan PP A.Ş. and Service Providers of Ceyhan PP A.Ş.
	Governmental authorities	<ul style="list-style-type: none"> <li>• Face-to-face meetings with authorities related to permitting issues;</li> <li>• Official written correspondence with authorities.</li> </ul>	Annual According to the Project's Needs	

## 9 GRIEVANCE MECHANISM

A grievance mechanism will be established in order to ensure that all comments, suggestions and objections received from the project stakeholders especially from the nearby surrounding communities and facilities are dealt with appropriately and in a timely manner. It is important to note that there will also be a separate grievance mechanism for workers/employees during construction and operation phases. It is important to mention that Ceyhan PP A.Ş. will only be responsible for the management of grievances related with the services it provides and also grievances of workers that are working at these services. Ceyhan PP A.Ş. will also be responsible for management of grievances related to operations/services conducted by the Project (sub)contractors.

Local communities will be informed about the grievance mechanism during the consultation and disclosure activities. Communities will also be informed that suggestions to improve the grievance mechanism itself are also welcomed. All grievances will be recorded, responded to and resolved in a defined timeframe. The grievance mechanism is currently at a planning stage. It is expected that comments and grievances can be sent to Ceyhan PP A.Ş. via mail, e-mail or fax during the construction and operation stages as well as through the Project website and telephone numbers/call centre. A Comment/Grievance Form and Grievance Closeout Form are presented in Appendix G and Appendix H respectively. The anticipated procedure to handle grievances is described below.

Although no specific resettlement grievance mechanism (RGM) was available during the expropriation process, as it was not required by the Expropriation Law, a general grievance mechanism, maintained by the Presidential Communication Center (CIMER) is generally used. Per the LRP and RAP, an RGM for the Project will now be established and PAPs will be duly informed during consultation and disclosure activities. Further information on the RGM is available in the LRP and RAP, however this document refers only to the general community grievance mechanism, not the RGM.

### 9.1 Public Grievance Mechanism

Regardless of general response and resolution timeframes, some complaints may require immediate attention, for example, an urgent safety issue or where it concerns the livelihood of locals.

Public Grievance will be managed in six main steps as described below.

#### 9.1.1 Receipt of Grievances

Complaint will be filed after it is received by the means of;

- letters or e-mails to the provided addresses;
- call on the provided phone number;

### Stakeholder Engagement Plan

- grievance boxes;
- visit to Project site by using the Grievance Form;
- in person by contacting the Project CLO.

The contact details for submitting grievances are provided below:

Ceyhan Polipropilen Üretim A.Ş.

Community Liaison Officer: Salih Yazar (CLO) - 0 538 218 74 08

Address: Aziziye Mahallesi, Portakal Çiçeği sokak, No: 33 Yukarı Ayrancı, Çankaya/ANKARA

E-mail: info.cpp@ronesans.com@ronesans.com

Telephone: +90 312 840 1201

It should be noted that all individuals are free to raise their grievances anonymously when requested. For the recording of the complaint, it is however important to specify an address that can be used by the Community Liaison Officer (CLO) to send a reply. The Project Company will ensure that all the grievances are managed with confidentiality, and only by authorised personnel. The consent of a person/organization filling a grievance for sharing any sensitive grievance-related information with third parties will be acquired by the Project Company prior to sharing this information.

#### 9.1.2 Reporting of Gender Based Violence and Harassment

Channels for anonymous reporting on Gender Based Violence and Harassment (GBVH) will be developed. The reporting channels will ensure safety and confidentiality to encourage reporting of such incidents and shall include any of the following:

- Grievance boxes;
- Toll-free telephone number;
- A designated organisation (e.g. NGO) or local women's organisation (as applicable).

Reporting channels are to include anonymous and child-friendly options to encourage children and young people to report relevant grievances and concerns.

Measures to be implemented to ensure GBVH cases are reported might include:

- Project workers will be provided with information regarding Code of Conduct in local languages which will include provisions for reporting, investigations, termination and disciplinary action against those perpetrating gender violence and harassment;
- The Project Company and contractors will conduct mandatory regular training and awareness raising for the workers on GBVH towards local community members and their colleagues especially women and the availability of a grievance mechanism to report any GBVH cases;

### Stakeholder Engagement Plan

- The Project workers will be made aware of the laws and regulations that make GBVH a punishable offence which is prosecuted;
- Ensuring representation of women in the Project team performing as the CLO or as a contact person to be approached with regard to GBVH issues;
- The Project Company will work in close cooperation with local authorities in investigating any grievances regarding GBVH in the local communities where it relates to Project workers;
- Develop a monitoring system to monitor GBVH activities to assess the effectiveness of the controls, including tracking of GBVH-related grievances and actions implemented in order to address them.

#### 9.1.3 Acknowledgement and Record Keeping

All incoming grievances will be reflected in a Grievance Log to assign an individual reference number in a daily basis and inform the complainant about the reference number assigned to his/her complaint, either on the date of filing (if a complaint is delivered personally or over the telephone) or within seven days of receipt (if a complaint is sent by ordinary or electronic mail).

The Grievance Log will also be used to track the status of a grievance, analyses the frequency of complaints arising, typical sources and causes of complaints, as well as to identify prevailing topics and any recurrent trends.

All complaints will be recorded in the respective Grievance Log with the following information:

- Grievance reference number;
- Date of the grievance;
- Location where the grievance was received and in what form (for grievance boxes);
- Complainant's contact details (in case of non-anonymous grievances);
- Content of the grievance;
- Parties responsible for the addressing the issue;
- Dates when the investigation of the grievances initiated and completed;
- Results of the investigation;
- Information on the proposed corrective actions to be sent to complainant (for non-anonymous complaints) and the date of the sending the information;
- Deadlines for required actions by the Project staff;
- Indication on whether the corrective action was satisfactory or a reason for non-resolution of the grievance;
- The result of the close-out; and
- Any outstanding actions for non-closed grievance cases.

After the registration of the grievance to the log, significance of the grievance will be assessed within five to seven days.

#### 9.1.4 Investigation

The CLO will classify the grievance and request suggestion from the related Project departments in 10-14 days.

Each complaint is directed by the CLO depending on the technical issues regarding the complaint (for example principal engineer in charge of construction for a given spread, officer in charge of land acquisition and compensation, environmental engineer, etc.).

Grievance is acknowledged through a personal meeting, phone call, grievance boxes or letter, as appropriate, within a target of 14 working days after submission (except the complaints that require immediate attention). If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant during this step.

If the resolution of the complaint is deemed to be within the responsibility of a construction or other contractor, a responsible individual should still be designated within the CLO to monitor the satisfactory resolution of the problem by the contractor in question.

#### 9.1.5 Response to Complainant

Each complaint is considered within 30 days of receipt and the reply is communicated using the address/telephone number specified by the complainant. The CLO keeps copies and records of all complains and replies.

The CLO is responsible to ensure a response is given within the above timeframe, and monitors agreement of the complainant on the proposed resolution and its further implementation.

For the anonymous complaints, resolution will be disclosed on the Project's website and/or banners posted around the Project Site.

#### 9.1.6 Discussion of Resolution

If a complainant is not satisfied with the proposed resolution, further negotiations can take place until the matter of the complaint is resolved and the case is closed. If negotiations between the Project parties and the complainant do not achieve a satisfactory result leading to the closure of the complaint, then the grievance is escalated to higher levels to be defined in the course of the Project's procedures setting.

### 9.1.7 Resource to Legal System

The parties may take the dispute to court at any point during the process. Resorting to the Project's amicable grievance resolution does not prevent the complainant to resort to Justice at any stage in the process.

## 10 EXTERNAL COMMUNICATIONS

The external communication includes exchange of information both within the entire the Project parties themselves and all related stakeholders. It is significant for all parties involved to take ownership of entire stakeholder relations and manage them effectively.

External communication is the very first step in creating the appropriate Project image. It contains related Project information from inventive reports, printed publications, presentations, or web pages. The main goal of external communication is to inform the stakeholders an important message about the work and quality of the Project. External communication activities play a very important role in every phase of the Project cycle. To engage with stakeholder groups that impacted parties: governmental institutions, local communities, associations, organizations, academia, media, and NGO's. A good working relationships will be established with all stakeholders and actively elicit their input through public consultations, focus groups, face-to-face meetings. It is essential to be proactive, accessible, and responsive about project impacts and work collaboratively with the stakeholders on projects of mutual interest.

The Grievance Mechanism will provide complaint management and their responses which is intended specifically on affected stakeholders. The external communications will be conducted in line with provisions of the SEP (to be updated on regular basis but at least annually) and the Grievance Mechanism (Section 0). All related Project representatives will communicate with the stakeholders on a regular basis. For implementation and maintenance of the external communication; each request and/or feedback will be recorded and be followed and responded to by the CLO. The team will track related external communications to facilitate a local discourse with identified stakeholders and affected communities.

According to the IFC, External Communications have several benefits:

- Increases program transparency;
- Reduces the spread of misinformation;
- Serves as a two-way channel for feedback from stakeholders;
- Builds interest and buy-in from civil society and government;
- Strengthens corporate image among the public and industry peers;
- Improves risk management;
- Strengthens brand value / reputation;
- Increases appeal to financial investors.

All engagements will be documented both in writing and photographically, with minutes taken in standardized format and attendance recorded. Minutes will be shared with and approved by participants.

## 11 MONITORING AND REPORTING

The monitoring measures are to be implemented throughout the Project phases to assess compliance of SEP with the dedicated Project Standards. In the event that monitoring identified non-conformance with the Project Standards, these will be investigated, and appropriate corrective actions will be identified.

The SEP will be reviewed bi-annually during the Project construction stage (and annually during the Project operation stage) and updated if required. The recorded grievances raised by the communities and the workers will be summarized and reported to all Project management monthly or quarterly all stakeholder engagement activities, grievances and the feedback will be disclosed in the Annual Environmental and Social Monitoring Report.

The Annual Environmental and Social Monitoring Report will include, at a minimum, information on the Project and the status of its implementation, information on key Project impacts and relevant mitigation/management measures, summary of stakeholder engagement undertaken, grievances received, and actions implemented to address them. The report will be disclosed on the Project Company's website. The affected communities and other key Project stakeholders will be informed on publication of this document by targeted notification by email or post. Paper copies of the report might be provided to affected communities and other stakeholders under request if these have problems with accessing the website.

### 11.1 Key Performance Indicators

A set of Key Performance Indicators (KPIs) have been defined to enable monitoring and evaluation of the implementation of the SEP and guide updates and revisions of the document. The Table below summarizes the KPIs and associated key monitoring actions that can be used to assess the progress and effectiveness of proposed mitigation strategies.

**Table 11-1.** Key Performance Indicators (KPI) and monitoring actions – Stakeholder Engagement

No	KPI	Target	Monitoring Measure
1	Number of community complaints or grievances	Total number reduced year on year	Complaints Log/Database
2	Number complaints responded <sup>4</sup> to within targeted time frame of one month	Target of 90%	Complaints Log/Database
3	Reporting back to stakeholders on implementation of the Grievance Procedure	Delivery of quarterly reports to stakeholders on the outcomes of the Grievance Procedure	Reporting <sup>5</sup>

<sup>4</sup> Not all grievances may be closed within 30 days, the closure of grievance will depend on grievance's targeted timeline; nevertheless, the Promoter will inform the complainant regarding the progress of the grievance within 30 days.

<sup>5</sup> The social reporting will be disclosed by the Project's website.

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No	KPI	Target	Monitoring Measure
4	Consultation Records <ul style="list-style-type: none"> <li>- number of the meetings held,</li> <li>- number of the participants attended the public consultation meetings,</li> <li>- visits paid to local authorities or other local stakeholders,</li> <li>- frequency of the visits paid to the settlements affected by the project,</li> <li>- number of grievances raised per settlement</li> <li>- types of grievances (complaint/request)</li> <li>- timeline required to solve grievances</li> <li>- status of grievances (open/closed)</li> <li>- number of grievances that are on hold/ or disagreed</li> </ul>	Delivery of quarterly reports on the consultation activities	Reporting
5	Internal auditing Grievance Procedure to ensure that it is being implemented and grievances are being adequately addressed	Bi-annual or annual audit complete Target of 90% of grievances closed out to satisfaction of complainant within one month	Audit report.

## 12 ROLES AND RESPONSIBILITIES

Table 12-1 Roles and Responsibilities for Stakeholder Engagement

Level/Unit	Roles	Responsibility
<b>Project Personnel</b>		
Top Management	<ul style="list-style-type: none"> <li>The Project Company's management will provide the necessary technical, administrative, financial, and human resources for effective implementation of the above activities. This includes supporting the CLO in facilitating meetings and external communication with stakeholders.</li> </ul>	Company
Environmental and Social Manager	<ul style="list-style-type: none"> <li>Overall management of the environmental and social issues;</li> <li>Overseeing and supporting the CLO in coordinating community relations and engagement activities;</li> <li>Monitoring the efficiency of the engagement activities, etc.</li> </ul>	Company
CLO	<ul style="list-style-type: none"> <li>Ultimately responsible for stakeholder engagement and grievance management;</li> <li>Manage the implementation of this SEP and its further revisions;</li> <li>Ensure effective periodic communication with internal and external stakeholders;</li> <li>Ensure compliance of the Project's social compliance, including implementation of this SEP, as well as the ESMP, RAP/LRP;</li> <li>Manage internal grievances as required;</li> <li>Arrange meetings, communications, and disclosure activities with affected communities and other stakeholders;</li> <li>Manage the community grievance mechanism, including timely resolution of grievances received, tracking grievances in the grievance log, regular analysis of the grievances received;</li> <li>Report grievances and stakeholder engagement activities monthly to the Project Company management;</li> <li>Maintain regular lines of communication with key stakeholders;</li> <li>Cooperate with the Company's experts responsible for the LRP, RAP, and BMP development and implementation;</li> <li>Engage with other Company experts and representatives of contractors as appropriate.</li> </ul>	Company
<b>CPIR Management Company</b>		
CPIR Management Company's CLO or land acquisition expert	<ul style="list-style-type: none"> <li>Addressing CPIR-related grievances in co-ordination with other relevant experts in the company and address any grievances received by CPIR Management Company that are related to the Project;</li> <li>In the instance that investigations into incidents are required, the CPIR Management Company CLO will work with the Project Company CLO to identify an appropriate investigation team with the correct skills to review the issue raised, and identify if the incident leading to the grievance is likely to reoccur or not;</li> <li>Manage issues related to land acquisition and physical and economic displacement (covered by the LRP/RAP)</li> </ul>	Company

Stakeholder Engagement Plan

Level/Unit	Roles	Responsibility
<b>Other Parties</b>		
<p>CLO Counterparts in other Projects</p>	<ul style="list-style-type: none"> <li>Attend regular meetings with other CLOs for different projects to appropriately collaborate on managing Grievances where there is an element of crossover with other projects, e.g., traffic, health and safety, security, and worker influx etc.</li> <li>Take preventative measures related to Grievances that apply to other project sites but could spread and impact relevant communities or workforces.</li> </ul>	<p>Company</p>

## APPENDICES

## Appendix A: Vulnerable groups within the Aol

Type of Vulnerability	Kurtpınarı	Kurtkulağı	Sarımazı	Gölovası
Children (Population Under 18)	Approximately 200 people	Approximately 100 people	Approximately 400 people	Between 100-150 people
People Aged 65+	More than a quarter of the population	More than a quarter of the population	More than a quarter of the population	More than a quarter of the population
Chronical Diseased or Special Care Needed People	Between 5-10 people	2 or 3 persons	At least 1 person	No information available
Disabled People (Mental & Physical)	2 persons	6 persons	2 persons	1 persons
People Who Do not Have Health Insurance	At least 10 households	Approximately 15 households	At least 10 households	Unknown number
People whos Income is below the Minumum Wage/ Receiving Donations from the State or Foundaitons	No information available	No information available	No information available	No information available
Female-headed Households	At least 15 households (one of these households is affected by the CPIR expropriation activities)	No information available	No information available	No information available
Children (Population Under 18)	Approximately 200 people	Approximately 100 people	Approximately 400 people	Between 100-150 people
People Aged 65+	More than a quarter of the population	More than a quarter of the population	More than a quarter of the population	More than a quarter of the population
Chronical Diseased or Special Care Needed People	Between 5-10 people	2 or 3 persons	At least 1 person	No information available
Disabled People (Mental & Physical)	2 persons	6 persons	2 persons	1 persons

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Type of Vulnerability	Kurtpınarı	Kurtkulağı	Sarımazı	Gölovası
People Who Do not Have Health Insurance	At least 10 households	Approximately 15 households	At least 10 households	Unknown number
People whos Income is below the Minumum Wage/ Receiving Donations from the State or Foundaitons	No information available	No information available	No information available	No information available
Female-headed Households	At least 15 households (one of these households is affected by the CPIR expropriation activities)	No information available	No information available	No information available

## Appendix B: Stakeholder List for Universities and Schools

		Universities and Schools
Level	Organization	Relation to the Project
Universities	Çukurova University	Within the scope of the project, students have internship and job opportunities.
	Fisheries Faculty, Çukurova University	
	METU Institute of Marine Sciences	
School	Toros Tarım Primary School	The school is in the vicinity of the Project site
	Turkish Petroleum Pipeline Company (BOTAŞ) Facility Primary school and kindergarten;	The school is in the vicinity of the Project site

## Appendix C: Stakeholder List for Governmental Authorities

GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
<b>Global</b>	ILO (The International Labour Organisation) Turkey Office	ILO may have specific views about the operation of the Project.
<b>National</b>	Ministry of Industry and Technology (MoIT), General Directorate of Industry and Sustainability	These organizations have direct relation with the Project and may present specific view on the Project.
	MoIT, General Directorate of Industrial Zones	
	MoIT, General Directorate of Industrial Safety and Inspection	
	Ministry of Agriculture and Forestry (MoAF), General Directorate of State Hydraulics Works	MoAF may have specific views about the operation of the Project considering marine part and land use characteristics around the Project site.
	MoAF, General Directorate of Forestry	
	MoAF, General Directorate of Fisheries and Aquaculture	
	MoAF, General Directorate of Nature Conservation and National Parks	
	MoAF, General Directorate of Livestock	
	MoAF, General Directorate of Water Management	
	MoAF, General Directorate of Agriculture Operations	
	MoAF, Directorate of Mediterranean Fisheries Research, Production and Training Institute	
	Ministry of Environment, Urbanization and Climate Change (MoEUCC), General Directorate of EIA, Permit and Audit	MoEUCC has regulatory functions in relation to the Project such as environmental impact assessment permits and environmental permitting.
	MoEUCC, General Directorate of Environmental Management	
	MoEUCC, General Directorate of Spatial Planning	
	MoEUCC, General Directorate of Infrastructure and Urban Transformation Services	
	MoEUCC, General Directorate of Natural Assets Protection	These organizations may have specific views about the Project considering its process in terms energy/utilities and site considering the neighbouring facilities/infrastructures.
	Ministry of Energy and Natural Resources (MoENR), General Directorate of Energy Affairs	
	MoENR, Energy Efficiency and Environment Department	
	MoENR, General Directorate of Mining and Oil Affairs	
	Petroleum Pipeline Company (BOTAŞ)	
	Turkish Petroleum (TPAO)	MoLSS may have specific views on labor and working conditions, and health and safety of the Project personnel.
	Ministry of Family, Labor and Social Services (MoLSS), General Directorate of Labor	
	MoLSS, General Directorate of Occupational Health and Safety	
MoLSS, Social Security Institution	This organization may have specific view about the implementation of the Project.	
Ministry of Disaster and Emergency Management		
Turkish State Railways	This organization may have specific views about the railway development in the vicinity of the Project site.	
Ministry of Transport and Infrastructure (MoTI), General Directorate of Marine Trade	These organization may have specific views about the marine trade, shoreline structures and	
MoTI, General Directorate of Shipyard and Shoreline Structures		

GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
	MoTI, General Directorate of Railway Works	railway development in the vicinity of the Project site.
	MoTI, General Directorate of Roadway Works	
	Ministry of Customs and Trade (MoCT), General Directorate of Customs	These organizations may have specific views about the Project since propane will be imported through sea shipment.
	MoCT, General Directorate of Domestic Trade	
	MoCT, General Directorate of Exports	
	MoCT, General Directorate of Strategical Development	
	MoCT, General Directorate of Trade Research	
	MoCT, General Directorate of Imports	
<b>Regional</b>	6th Regional Directorate of DSI (State Hydraulic Works)	This organization may have specific views about water courses running close to the Project site.
	7th Regional Directorate of Ministry of Agriculture and Forestry	This organization may have specific views on the land use characteristics in/out of the Project site and protected areas close to the Project site as well as the status of the trees in the Project site (if any).
	5th Regional Directorate of General Directorate of Highways	The organization may provide opinion regarding roads and highways related to Project site.
	Adana Regional Board Directorate of Cultural Assets Protection	This organization is an important stakeholder to identify and clarify the archaeological potential of the Project site.
	6th Regional Directorate of State Railways	This organization may have specific views about the railway development in the vicinity of the Project site.
	5th Regional Directorate of Transport and Infrastructure	The organization may provide opinion regarding roads and highways related to Project site.
<b>Provincial</b>	The Governorship of Adana	The governorship, representing the national government, is the highest authority in the province.
	Adana Metropolitan Municipality	The metropolitan municipality and its relevant departments will have responsibilities in relation to the Project.
	Adana Metropolitan Municipality, Directorate of Environmental Protection and Control, Waste Management Branch	
	Adana Metropolitan Municipality, Directorate of Environmental Protection and Control, Marine and Inland Water Services Branch	
	Adana Metropolitan Municipality, Directorate of Planning	
	Adana Metropolitan Municipality, Directorate of Transportation, Transportation Planning Branch	This organization may provide provincial-specific and/or site-specific views on the Project related with the cultural assets.
	Adana Cultural Assets and Tourism Branch	
	Adana Provincial Directorate of Social Security Institution	

GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
	Adana Provincial Directorate of Environment, Urbanization and Climate Change (PDoEUCC)	PDoEUCC has regulatory functions related to the Project such as environmental impact assessment permits and environmental permitting.
	Adana Provincial Directorate of Agriculture and Forestry	This organization may provide provincial-specific and/or site-specific views on the Project.
	Adana Provincial Directorate of Industry and Technology	
	Adana Hacı Sabancı Organized Industrial Zone	
	TOROSLAR Electricity Distribution Company	
	Adana Provincial Directorate of Trade	
	Adana Provincial Directorate of Customs	
	Adana Provincial Directorate of Communications with Non-Governmental	
	Adana Water and Sewer Administration-ASKİ	This organization may provide an opinion related to water/wastewater infrastructure of the Project site.
	Adana Provincial Command of Gendarmerie	This organization has a function to manage and respond to emergency situations.
	Adana Disaster and Emergency Management Directorate	
	Adana Provincial Directorate of Health	This organization may provide site-specific views on the Project.
	Coastal Zone Authority - Ceyhan	This organization may provide site-specific views on the Project.
<b>District</b>	The Local Governorship of Ceyhan, The Municipality of Ceyhan	The project site is located in Ceyhan district and the local governorship, the central municipality are stakeholders regarding obtaining relevant permits, approvals during planning, and construction and operation phases of the Project.
	The Local Governorship of İmamoğlu, The Municipality of İmamoğlu	
	The Local Governorship of Sarıçam, The Municipality of Sarıçam	
	The Local Governorship of Seyhan, The Municipality of Seyhan	
	The Local Governorship of Yumurtalık, The Municipality of Yumurtalık	
	The Local Governorship of Yüreğir, The Municipality of Yüreğir	
	The Local Governorship of Erzin, The Municipality of Erzin	
	Ceyhan District Directorate of Ministry of Food, Agriculture and Livestock	

## Appendix D: Stakeholder List for Non-Governmental Bodies

NON-GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
	Çukurova Protection of Amateur Fishing, Marine and Natural Life Association	
	Protection from Chemicals Association	
	Yumurtalık Deveciüşağı Fisheries Protection, Training and Solidarity Association	
	Protection and Sustentation of Nature and Animals	
	Anatolian Animal Rights Federation	
	Mediterranean Fish and Aquaculture Producers Association	
	Ceyhan Amateur and Sportive Handline Fishers Association	
	Çukurova Ornithology Association	
	Natural Life Protection, Development of Agriculture and Livestock Association	
	Sustainable Fisheries and Environmental Research Association	
	Sustainable Agriculture (Agroecology) Association	
	Turkish Agriculturalist Association - Adana Branch	
	Adana Children and Woman's Right Association	
	Human Rights Association -Adana Branch	
	Adana Regional and Economical Development Association	
	Adana Young Entrepreneur And Innovation Association	
	Adana Solution to Unemployment Association	
	Adana Sustainable Development, Protection of Environment and Consumer and Culture Association	
	Mediterranean Environmental Protection and Culture Association	
	Eastern Mediterranean Civil Society Empowerment Association	
	Tarsus Protection and Sustentation of Old Valuable Assets Association- Adana Branch	
	Yumurtalık Platform Environmental Training and Culture Association	
	All Subcontractor Employees Corporation and Solidarity Association - Adana Branch	
	Headmen Federation	
	Çukurova Enhancing Society and Solidarity Association	
	Adana City Council	
	Development of Tourism in Yumurtalık and Protection of Environment Association	
	Ecological Research Society (Ekad)	
	Toraks-Association	
	World Wildlife Fund	
	Turkish Foundation for Combating Soil Erosion for Reforestation and Protection of Natural Habitats	
	Ceyhan Chamber of Agriculture	
	CAYGEM Ceyhan Business Development Center	
	Ceyhan Chamber of Commerce	

## Stakeholder Engagement Plan

NON-GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
NON-GOVERNMENTAL BODIES		
Level	Organization	Relation to the Project
	Ceyhan Bourse of Commerce	
	Ceyhan Tradesmen and Craftsmen Credit and Surety Cooperative	
	Yumurtalik District Ayas Aquaculture Cooperative	
	Civil Society Institution - Adana	
	Greenpeace	
	Child Labor Monitoring and Prevention Association	
	Adana Women's Solidarity Center and Shelter Association	
	Adana City Council	
	Çukurova Ecological Life Initiative	
	Uçan Balon Child and Youth Association	
	Turkish Women's Union	
	Seyhan Regional Development Association	
	European Union Harmonization, Development, Culture and Contemporary Life Association	
	Housewives Culture and Solidarity Association	
	Adana Provincial Coordination Board	
	Kurtkulağı Agricultural Credit Cooperative No. 2001	
	Sarımazı Agricultural Credit Cooperative No. 1953	
	Gölovası Aquaculture Cooperatives	
	Mediterranean Agriculture and Citrus Workers Motor Carriers Cooperative	
	Altı Nokta Körler Association	
	Adana Ceyhan Special Education and Rehabilitation Center	
	Çukurova Special Education and Rehabilitation Center	
	Ceyhan Umut Yolu Special Education and Rehabilitation Center	
	Mavi Boncuk Special Education and Rehabilitation Center	

**Appendix E: Photographs taken during the Public Consultation Meeting held on 6<sup>th</sup> March 2020**



Within the scope of the Personal Data Protection Law, the photos from the Public Consultation Meeting have been removed from this publicly available version of the Stakeholder Engagement Plan.

## Appendix F: Meeting notes of Public Consultation Meeting held on 6th March 2020

A public consultation meeting (PCM) was conducted on 6th March 2020 in coffee house in Kurtkulağı Neighbourhood located approximately 6.5 km to the Project site. Following the PCM, a face-to-face meeting with headmen of Gölovası Neighbourhood, who is also responsible for the S.S.S. Gölovası Neighbourhood Aquaculture Cooperative, was held. Ceyhan Polipropilen A.Ş. (Project Company) representatives and HaskoningDHV TR Engineering Inc. (RHDHV-TR) Environmental and Social Impact Assessment (ESIA) Project team members were present during the PCM. A total of 58 people attended the PCM; including 35 people from Kurtkulağı, 8 people from Kurtpınarı, 7 people from Sarımazı, 2 people from Gölovası, 2 people from Ulus, 1 person from Sağırlar, 1 person from Narlık, 1 person from Hürriyet as well as 1 delegate of Development of Tourism in Yumurtalık and Protection of Environment Association.

Attendees from Project Company:

- İlhan Uğur Alkan, Finance Director
- Tuba Arslan, Business Development Specialist
- Gamze Neslihan Şahin, Design Specialist
- Eylül Kırbaç, Environmental Specialist

Attendees from RHDHV-TR:

- Gürkan Özbek, Environmental and Social Expert
- Hande Hatipoğlu, Environmental and Social Expert
- Elif Öç, Environmental and Social Expert

The meeting started with a brief on the Project, including fields of use of polypropylene, given by the Project Company representatives; followed by RHDHV-TR Project team's presentation summarizing the main features of the Project and ESIA process as well as stakeholder engagement process and activities has been and to be undertaken. A question-answer session was undertaken after the presentation where the following topics were discussed:

- Cooling water use/source:

Questions related with the need for the water sources to be used in the processes and possibility of sea water to be used as cooling water, were raised during the meeting. Concerns are mainly related with negative effects of potential sea water temperature change on the marine habitat.

Project Company responded that sea water will not be used for any purposes in the Project. The Project will certainly have a cooling system; therefore, a suitable technology was selected to recirculate the water within the process. It was also stated by the Project Company that

there are several applications of the same process in different countries (America, Canada, Belgium etc.), where it is successfully operated.

- Potential adverse impacts on the nearby communities

Due to the proximity of the Project to the residential areas, the public was curious about the potential mitigation measures to be taken during the implementation of the Project. Project Company explained the health protection zone to be provided between the Project premises and the residential areas. It was also emphasized by the Project Company that the units have also been designed to be positioned at a certain distance from the health protection zone border. Additionally, a brief information on the steps of the ESIA process were provided and potential environmental and social issues to be assessed during the ESIA process related with the Project were summarized.

- Polypropylene fields of use:

Information related with the superiority of poly-propylene was requested. Project Company provided information on the current status of the poly-propylene productions (import and export capacity of Turkey) and fields of use of polypropylene. Project company underlined that Turkey is mostly a poly-propylene importer and this Project is expected to increase the national production to supply %20 of the national demand.

- Proposed workforce during construction and operation phase of the Project:

Project Company stated that maximum 250-300 personnel will be employed during the operation phase of the Project; whereas, 2,500-3,000 workers (at peak conditions) will be employed during construction phase of the Project.

- Local Employment:

Previously, other Project developers in the region committed to provide local employment. However, as reported by local public, employment could not be provided at a sufficient rate not only during construction but also during operation phases of the Projects. Especially in the operation stage, in which qualified workforce is required, local employment decreases. Reportedly, unemployment rate (both skilled, semi-skilled, and unskilled) is quite high in the surrounding neighbourhoods as young generation mainly leave the region to seek jobs in other cities / regions.

Residents (both young and mid-age groups) are willing to be employed in the Project. Especially, women groups raised their requests related to employment. They are willing to be employed during construction and operation phases of the Project. They are also open for developing new skills/capabilities; such as cooking etc., possibly through training courses, certification systems etc., which might even be provided by the Project Company.

Sarımazı Village Headman expressed that there are 5 villages around the Project site and he asked how will the recruitment be shared. Project Company representatives stated that Project Company also favours local recruitment, however this is limited with the candidate's professional suitability with the required jobs, so that such allocation per village cannot be given. Another attendee asked for a certain quota to be provided for local employment. Project Company representatives stated that this is also limited with the candidate's professional suitability with the required jobs, so that such quota cannot be provided.

- Raw material supply and political discrepancy:

It was stated during the PCM by one of the attendees that the operation of the Project is dependent to the political issues due to the fact that propane will be imported through sea shipment from Algeria. Project Company stated that concerns related with the possible political discrepancy between Algeria and Turkey were discussed during the proposal stage and shareholder structure was organized accordingly. It was also stated by the Project Company that there are a number of alternative propane suppliers/importers in the market.

- Planned social responsibility activities:

Questions were raised regarding corporate social responsibility activities planned by the Project Company considering the proximity of the Facility to the surrounding neighbourhoods. As a response, it is of particular importance for the Project Company to understand and identify the communities' needs together with the shareholders.

Attendees requested the renovation of the Health Centre and Football ground in Kurtkulağı neighbourhood.

- Environmental concerns/potential impacts:

RHDHV-TR Project team presented potential environmental and social aspects/issues related with the construction and operation phase of the Project and briefly informed the public about the possible environmental concerns such as impacts on the sea/sediment quality and marine habitat, noise/vibration and air quality, impacts on water sources and agricultural activities etc.

Project Company stated that the units/process of the Project is completely different from the Thermal Power Plants' processes as there are significant concerns related with thermal power plant operations in the region. The main raw material to be used; namely propane, is quite similar to LPG and much cleaner as compared to coal.

- Community health and safety concerns:

Information on road transportation routes were requested and concerns related with the potential traffic increase were raised. Project Company provided information on the potential

routes for road transportation which are not passing through the Kurtkulağı and Kurtpınarı neighbourhoods.

Meeting Notes with Gölovası Neighbourhood Headman, who is also responsible for the S.S.S. Gölovası Neighbourhood Aquaculture Cooperative:

A total of 30-40 fishery boats are based in S.S.S. Gölovası Neighbourhood Aquaculture Cooperative. Owners of the 4-5 of these boats reside in Incirli. Reportedly, 20% of the population secure their income through fishing activities in Gölovası Neighbourhood and fishing activities are mainly conducted in between Dört Yol and Yumurtalık region. The areas, where the fishing activities are conducted changes (coastal and deep-sea fishing activities), depending on the season. Coastal fishing activities are mainly performed during winter season; whereas fishing in deep sea is more common during summer. Reportedly, it is prohibited to conduct fishing activities at a certain distance from the BOTAŞ, TOROS Tarım and İSKEN shoreline. Coastal fishing activities are restricted due to the industrial developments in the region with construction of jetties (having 1 to 2 km distance from the shoreline); therefore, coastal fishing activities are being performed in only the permissible areas between BOTAŞ and Yumurtalık Free Zone (i.e. where the Project site is located). It is stated that currently fishing boats are frequently using the shoreline close to the Project site for coastal fishing and with the development of a new jetty and its protection area, their activity will be further limited.

Reportedly, fishing activities are not affected by the marine traffic. However, due to the number of jetties constructed in the region, the time spent for round trips by fishermen has increased.

Reportedly, most of the fish population in the region uses the areas around the jetties as nursery ground (i.e., BOTAŞ, TOROS Tarım etc.). It was stated by the headman of Gölovası Neighbourhood that a number of corporate social responsibility activities have been undertaken in the region within the scope of the stakeholder engagement efforts of the industrial facilities (e.g. BOTAŞ-BTC and İSKEN Thermal Power Plant). In this context, most of the fishermen and the Cooperative itself receives support from these Facilities (i.e., scholarship for their children, machinery support/allowance etc.).

## Appendix G: Sample Grievance Form

**CEYHAN PROPANE DEHYDROGENATION AND POLY-PROPYLENE PRODUCTION PROJECT  
COMMENT/COMPLAINT FORM**

<b>INFORMATION ABOUT THE PERSON SUBMITTING COMMENT AND/OR COMPLAINT</b>		
<small>(Please leave blank if you wish to remain anonymous. Your comments/complaints will still be considered by the Project Developers)</small>		
<b>Full Name:</b>	<b>Contact Information: (Please provide necessary information based on how you wish to be contacted)</b>	
	By mail .....	
<b>Date:</b>	By phone .....	
	By e-mail.....	
<b>Indicate your purpose:</b> <input type="checkbox"/> Comment <input type="checkbox"/> Complaint		<b>Signature</b>
<b>Recorded by:</b> <input type="checkbox"/> Person submitting comment/complaint <input type="checkbox"/> Other (please specify who)		..... .....
<b>YOUR COMMENTS ON THE PROJECT (Continue on the back of the sheet if required)</b>		
<b>INFORMATION ABOUT YOUR COMPLAINT</b>		
<b>Describe the Complaint (Continue on the back of the sheet if required)</b>		
<b>Date of Incident Regarding Complaint</b>		
<input type="checkbox"/> One time incident/grievance (Date .....		
<input type="checkbox"/> Happened more than once (how many times? .....		
<input type="checkbox"/> On-going (currently experiencing problem)		
<b>What would you propose to resolve the problem? (Continue on the back of the sheet if required)</b>		
<b>This section will be filled by the Project Developers (Special Purpose Vehicle)</b>		
<b>STATUS OF COMMENT</b>		
<b>Comment Logged (Y/N)</b>	<b>Comment Logged (Y/N)</b>	<b>Comment Logged (Y/N)</b>
<b>Response Required (Y/N)</b>	<b>Response Required (Y/N)</b>	
<b>STATUS OF COMPLAINT</b>		
<b>Complaint Logged (Y/N)</b>	<b>Complaint Logged (Y/N)</b>	<b>Complaint Logged (Y/N)</b>
<b>Date of Response sent:</b>	<b>Date of Response sent:</b>	<b>Date of Response sent:</b>

You can send your written comment/grievance to us by mail, e-mail or fax:

E-mail : info.cpp@ronesans.com

Fax : +90 312 468 1336

Address : Aziziye Mah. Portakal Çiçeği Sok. No:33 Çankaya/Ankara

Appendix H: Sample Grievance Closeout Form

Type of Grievance:	<input type="checkbox"/> Public	<input type="checkbox"/> Employee
Is the case urgent:	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Comment/Complaint Form number		
Grievance closeout number:		
Date Submitted:		
Target Date for Resolution:		
Contact Information of the Stakeholder (if given)		
Desired Method of Contact:		
Description of the Grievance:		
Compensation Required?	<input type="checkbox"/> YES	<input type="checkbox"/> NO
Assessment of Grievance Level and Rationale:		
<b>CONTROL OF THE REMEDIATE ACTION AND THE DECISION</b>		
Stages of the Remediate Action	Deadline and Responsible Party	
1.		
2.		
3.		
4.		
5.		
6.		
7.		
8.		
Sign off:		
Date:		
<b>In case the case was non-anonymous</b>		
Is the complainant satisfied with the corrective action taken to address the grievance?	<input type="checkbox"/> YES <input type="checkbox"/> NO	Comments:
Is the grievance resubmitted?	<input type="checkbox"/> YES <input type="checkbox"/> NO	Comments:
New Grievance Form Number		Date of Resubmission:
<b>Grievance Closure:</b>		
<b>To be Completed by Non-Anonymous Complainant</b>		
Name of the Complainant:		
Are you satisfied with the corrective measures taken for your grievance?	<input type="checkbox"/> YES <input type="checkbox"/> NO	Comments:

Stakeholder Engagement Plan

Signature of Complainant:		Date:
<b>To be Completed by CLO</b>		
Are you satisfied that this grievance has been resolved?	<input type="checkbox"/> YES <input type="checkbox"/> NO	Comments:
Signature of CLO		Date: