



Iskenderun Port Expansion Project

Stakeholder Engagement Plan

Revised Report

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Prepared for

LimakPort
Iskenderun

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1.0 INTRODUCTION

This document presents the Stakeholder Engagement Plan (SEP) for the Iskenderun Port Expansion Project (Project) which will be implemented by the company Limak Yatırım Enerji Üretim İşletme Hizmetleri ve İnşaat A.Ş. (Limak). The Project will involve the capacity expansion of the Iskenderun Port and development of a large portion of the existing port area into a modern container terminal. After the proposed capacity expansion, the annual container throughput capacity will be 1,334,000 Twenty-foot Equivalent Units (TEU).

The SEP is a public document, which presents plans for stakeholder engagement, consultation and disclosure, and is to be updated for each phase of the project. This version of the SEP covers engagement activities to be undertaken during the Environmental and Social Impact Assessment (ESIA) study of the Project. Activities to be undertaken during construction and operation phases are also briefly outlined in this SEP.

The primary goal of the SEP process is to ensure transparency and involvement of individuals, groups and organizations affected by and/or interested in the project (to be called as stakeholders) in assessing and managing the potential environmental and social impacts of the Project, and to provide relevant, timely and accessible information to stakeholders in an appropriate and understandable format. SEP process helps to:

- identify and involve all potentially affected stakeholders
- 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 main purpose of this document is to:

- define the consultation approach for stakeholders,
- set up a process to address public views and/or concerns,
- identify resources and responsibilities for implementation and monitoring of the consultation program, and
- set up a grievance mechanism for local stakeholders.

1.1 Project Information

Iskenderun Port has been owned and operated by the Turkish State Railways (TCDD) since it was brought into service in 1972. A bid was tendered by the Prime Ministry Privatization Administration for the purpose of privatization of the Iskenderun Port, which was awarded to Limak by the official decision dated 7 July 2011. Under the terms of this contract, Limak will undertake the detailed design

and construction for the Project and will continue to provide port services as it was served by TCDD before. The Port is currently an operating port and as of the handover, Limak will continue operation and start the construction activities at the same time.

The Iskenderun Port is located at the southeastern part of the Mediterranean coast of Turkey, near the border with Syria. The port is situated on the coastal strip of Iskenderun District in Hatay Province. Iskenderun Port is located 2 kilometres away from the E-91 highway and is located near the D-817 Adana-Iskenderun Road. Having connection with the railway network, Iskenderun Port is in position to serve for transit operations of Middle Eastern countries such as Syria, Iran, Iraq and so on, as well as providing export-import cycles for Çukurova and Southeastern Anatolian regions including provinces of Hatay, Adana, Osmaniye, Kahramanmaraş, Gaziantep, Adıyaman, Malatya, Elazığ, Şanlıurfa, Diyarbakır and Mardin in Turkey.

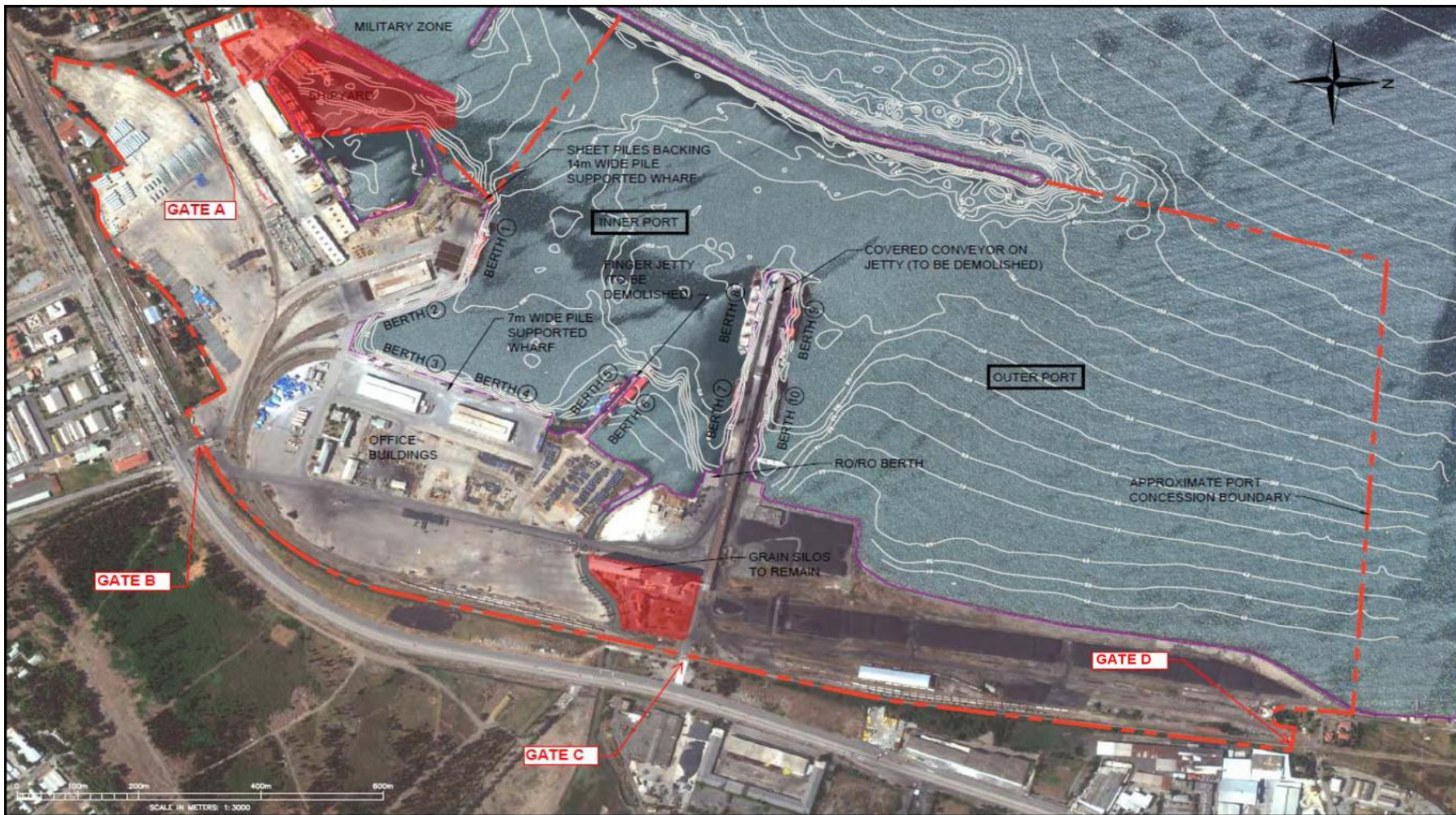
Iskenderun Port currently has 10 berths, designed to serve general cargo, dry bulk and Ro/Ro vessels as well as container ships that have their own gear. For protection against marine effects, the port is surrounded by a breakwater of 1425 metres in the west and a main jetty of 430 meters. Iskenderun port can be divided in two areas, the inner port, which comprises the currently developed berths and is the southern portion roughly enclosed by the line drawn from the tip of main jetty, and the outer port that is outside the boundaries of the inner port and available for future development. The outer port is currently used as a coal handling facility. The layout of the inner port and the numbering of the berths is shown on Figure 1.

The Project will involve demolition and redevelopment of major port structures and development of container yard areas, and upon completion will provide 850 m total berth length with a 450 m diameter turning circle in the inner port area. In addition, the berth depth within the inner port will be increased to -15 m since the largest vessel will have 14.5 m draught.

500 thousand live cattle, 475 thousand live sheep and goats, 75 thousand tons of cattle with zero customs, valid until 31.12.2018, with the decision of the Council of Ministers published in the Official Gazette dated July 29, 2017. import authorization has been given for meat.

In this context, in order to meet the meat requirement of our country, live animal imports are made by the General Directorate of Meat and Dairy Authority, which is authorized by our Government from South American countries, to use sheltered large harbors with a Mooring, which includes a Veterinary Border Control Point Directorate. Port selection is determined by the General Directorate of Meat and Dairy Authority and authorized contractors, taking into consideration the region to be imported.

In addition, in line with the decisions taken by our Government, the project, which is based on the National Livestock Policy of the Ministry of Food, Agriculture and Livestock, increases the support for small family business, stockbreeding and animal husbandry, and rehabilitation of 20 thousand enterprises is envisaged in 2018 by the General Directorate of Agricultural Enterprises. It is stated that imports of livestock will be realized.



Source: Iskenderun Port Masterplan by Moffatt & Nichol (Limak’s concession boundaries are shown in dotted lines. The areas that are actually excluded from the concession and belong to the shipyard and the State are shown shaded in red)

Figure 1. Existing layout, concession boundaries and berth locations at Iskenderun Port

The project comprises the upgrading of the existing port structures by phased construction, while existing port operations are continued. The following key activities are planned as part of the proposed project:

- Demolition of the finger jetty (consisting of berths 5 and 6)
- Demolition and redevelopment of berths 1 and 2 to create one continuous berth and deepening of berth pocket in front of the new berth
- Redevelopment of berths 3 and 4 (including 210 m extension) to create one continuous berth
- Demolition of berths 8 and 9 to create 230 m long main jetty (which is currently 350 m long)
- Dredging to -15m LAT (approximately 1,800,000 m³)
- Hydraulic placement of dredge spoils behind rock-filled containment bunds, for future outer port container yard area
- Reclamation of the shipyard basin (behind berths 1 and 2) and development of container yard in this area
- Demolition of warehouse buildings at berths 3 and 4; development of the land behind berths 3 and 4 as container yard
- Demolition of warehouse building behind berth 2
- Demolition of existing office building complex behind berth 3
- Construction of utilities including stormwater drainage, water supply and sanitary sewer
- Construction of access roads, operation areas, intermodal yard (rail), etc.
- Construction of administration building, terminal operations building, workers service building, maintenance and repair building, fire station, transformer building, warehouses, reefer wash, etc.
- The TMO berth is shortened by 110 meters to create a maneuver area to serve larger vessels. Completed in 2018.
- *LimakPort has included the shipyard area in the port bonded area in 2020 and opened the area for use. – Completed*
- *In 2020, LimakPort, the empty area in the D Gate Area was included in the bonded area and a new CFS area was created in this area. - Completed*

1.2 Project Program

1.2.1. Construction

Construction is estimated to take approximately 44 months. According to Limak's tentative construction schedule, works to be completed within the first 20 months, most of which will be carried out simultaneously, include demolition of the small jetty (berths 5 and 6), demolition of warehouses

and the existing office buildings behind berths 3 and 4, redevelopment and extension of berths 3 and 4, development of the container yard behind berths 3 and 4, marine dredging to -15 m, construction of most buildings and warehouses and construction of utility corridors. The next phase of construction (from month 20 to month 44) will involve demolition of the warehouse behind berth 2, demolition and redevelopment of berths 1 and 2 and deepening of berth pocket in front, development of the container yard behind berths 1 and 2, reclamation of the shipyard basin, as well as demolition of berths 8 and 9. The project is estimated to have a 36-year lifespan.

1.2.2. Environmental Impact Assessment Process

In accordance with the Turkish Environmental Impact Assessment (EIA) Regulation (published in the Official Journal dated 17 July 2008 and numbered as 26939), EIA study is required for capacity increase and/or expansion projects when the capacity increase is equal to or greater than the threshold values specified in Annex-1 of the regulation. The Project falls into Annex-1 (10-b) “commercial harbors, wharves and dockages which can berth marine vessels over 1,350 DWT (excluding the wharves for sunbathing and sporting purposes)”. On this basis, EIA study has been completed for the Project and the EIA Report has been submitted to the Ministry of Environment and Urbanization (MoEU) in November. The EIA Report that has been finalized by the Review and Evaluation Commission of MoEU has been disclosed to public on 8 December 2011 to get their comments for a period of 10 days.

1.2.3. Upgrade of EIA Study to International Standards

Limak is seeking finance from multinational financial institutions to fund the development of the Project. One of the requirements of these financial institutions for granting loans is the preparation of an ESIA Report. The ESIA will be prepared to comply with the requirements of International Finance Corporation’s (IFC) Performance Standards on Social and Environmental Sustainability (dated 30 April 2006). Accordingly, the Turkish EIA Report will be reviewed and supplementary studies will be undertaken as needed to upgrade the report into an IFC compliant ESIA that will identify the environmental and social impacts of the project and be accompanied by an Environmental and Social Management Plan (ESMP) that identifies how significant impacts will be mitigated, managed and monitored through the construction and operation of the project.

The ESIA process for the project started in August 2011 and a scoping study was undertaken in September 2011. The ESIA studies are planned to be completed by March 2012.

1.3 Summary of Potential Environmental and Social Impacts

Based on scoping study undertaken in September 2011, the potential environmental and social impacts of the Project are identified as follows:

- Impacts on marine water quality during construction activities and operation due to increased ship traffic
- Characterization of the dredged material to identify options for placement in rock-filled containment bund and/or other treatment/disposal methods

- Increase in road traffic during construction activities (transport of materials to and from the port) and nuisance to the nearby settlements (noise, dust, etc.)
- Increase in road and ship traffic during operation
- Impacts of noise, dust, traffic and visual intrusion during operation
- Management of waste from ships
- Likely loss of fishing grounds due to increased anchoring sites as a result of increased ships

2.0 NATIONAL REGULATORY REQUIREMENTS AND INTERNATIONAL PRACTICE

Public participation is legally required by the Turkish EIA Regulation (Official Gazette date and number: 17.07.2008/26939) which includes provisions for public consultation and disclosure of project information. According to the Turkish EIA regulation, public consultation is required for projects that are subject to Annex 1 of the regulation. Initially, an EIA application file is prepared and submitted to MoEU. After being found appropriate, MoEU sends one copy of the EIA application file to the relevant Provincial Directorate of Environment and Urbanization (PDEU) where the project will be actualized. The PDEU then makes a public announcement (through press advertisements and the internet) stating that the EIA application file has been submitted, the EIA process has commenced and that any comments from the public should be directed to the PDEU and/or the MoEU. The MoEU also advertises the Project and the commencement of the EIA process on their website. The public is able to obtain further information (i.e. the EIA Application File) from the MoEU and submit any comments or concerns.

The EIA Regulation requires that a public meeting is held following submission of the EIA Application File. Once a date and location for the meeting have been confirmed by the PDEU and the project owner, it is communicated to the MoEU. Once accepted, the project owner is required to advertise the date, time, location and agenda of the public meeting in one national and one local newspaper at least 10 days prior to the meeting date. The public meeting that is being held in Turkey in line with the Turkish EIA Regulation falls into the scoping stage of the Project.

After the public meeting is held, the commission comprising representatives of the MoEU, relevant national and provincial authorities and the project developer, holds a meeting to define the scope of the EIA study to be undertaken. After the scope is determined, the project owner submits the EIA report which is evaluated in a second meeting held by the commission. After the EIA report is found appropriate, the MoEU and the PDEU announce by proper means the commencement of the review process for the project and that the EIA report is open to public opinion. Those who are willing to review the EIA report may review the report at the MoEU or PDEU as of announcement date and present their opinions to the MoEU or the PDEU within the timeline. The opinions forwarded to the PDEU are conveyed to the MoEU and are considered by the commission and reflected to the EIA report.

As stated, the Iskenderun Port Expansion Project is listed in Annex 1 of this regulation and has already met the requirement of holding a public meeting in Iskenderun.

In addition to the national requirements, the Project will also comply with the requirements of International Finance Corporation's (IFC) Performance Standards on Social and Environmental

Sustainability (dated April 2006). IFC Performance Standards related to consultation and disclosure of information require (i) identification of stakeholders that 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 government bodies, general public); (ii) disclosure of relevant information to stakeholders, (iii) consultation to start at an early stage of the ESIA process and to continue on an ongoing basis. IFC also requires disclosure of the draft ESIA report to the public for review and comments so that they will have the chance to review the assessment study and understand the impacts and risks of the project and be informed about mitigation measures to be taken to avoid/reduce adverse impacts. The requirement in Turkey for the disclosure of EIA reports is limited, however IFC requirements enable affected people and other stakeholders to review the ESIA report and provide them opportunities to express their views on the assessment and mitigation measures. The ESIA of the Iskenderun Port Expansion Project will be also made publicly available.

Limak has also corporate standards that include disclosure of description of projects on the Limak Holding website. With respect to this Project, Limak will establish a Project specific website for disclosure of information on a regular basis. According to best practice and the IFC requirements, Limak is now offering additional and supplementary information and consultation opportunities for stakeholders as described in the following sections.

3.0 CONSULTATION UNDERTAKEN TO DATE

Consultation undertaken to date includes consultation during the Turkish EIA study and during the scoping stage of the ESIA process. These already performed public consultations are briefly described in the following sections.

3.1 Consultation during the Turkish EIA Study

In accordance with the Turkish EIA Regulation, a Public Consultation meeting was held on 24 June 2011 at the Iskenderun Municipality meeting hall. Although the meeting was advertised in local and national newspapers, there were no attendees from the public. A presentation was made by the company responsible for undertaking the EIA studies to the attendees from Provincial Directorate of Environment and Forestry (MoEF- former name of the Ministry of Environment and Urbanization (MoEU), General Directorate of Nature Protection and Natural Parks of MoEF, Adana Regional Directorate of Transportation and Limak. Due to the absence of local public at the meeting, a household survey has been conducted at the vicinity of the port. Of the 49 people surveyed:

- 47 are aware of the port expansion project,
- 1 is concerned that the project may cause pollution (general),
- 2 are concerned that the project may cause marine pollution,
- 2 are concerned that the project may cause security issues (due to foreigners in town),
- When asked what would improve the living conditions in the area, 21 included “port” in their responses. Additional 2 people believe that “investments” are needed in the area. In addition, 2 people responded as “employment”.

In addition, opinions of the following governmental bodies have been received during the EIA study that include issues to be considered in the EIA study:

Organization	3.1.1.1.1.1.1.1 Key Issues Raised
Ministry of Environment and Forestry (MoEF)*, General Directorate of State Hydraulic Works, Department of Survey and Planning	Impacts on groundwater and marine water, works related to flood prevention and drainage, amount of excavation/solid waste to be generated and their disposal options
General Directorate of Highways (KGM)	Contact with KGM 5 th Regional Directorate to get their opinion, determination of which roads to be used during transportation of fill material, impacts of additional vehicle load
Hatay Provincial Directorate of Agriculture	Impacts of dredging and measures to be taken, compliance with Aquatic Products Law (Law No: 1380) as the port area is located within the aquatic products production zone according to the mentioned law.
Undersecretariat of Maritime Affairs	Marine traffic, projected number and type of vessels, status of emergency response plan
General Directorate of Railways, Harbours and Airports Construction	Loading/unloading capacity of the port, dimensions of the berths, establishment of the bathymetry map

Organization	3.1.1.1.1.1.1.1 Key Issues Raised
Hatay Provincial Directorate of Disaster and Emergency	Providing information on geology and natural disasters, distance of active faults to the port and earthquake risk
MoEF, General Directorate of Nature Protection and Natural Parks	Impacts on marine ecosystem, investigation of presence of wetlands in the project area and its vicinity, mapping of the habitats identified
MoEF, General Directorate of Environmental Management, Department of Marine and Coastal Management	Determination of marine water quality, measures to prevent marine water, disposal method of the dredged material, preparation of a "Risk Assessment and Emergency Response Plan".
Ministry of Public Works and Settlement, General Directorate of Technical Investigation and Implementation	Preparation of the zoning plan related to the port expansion

3.2 Preliminary Consultation during the ESIA Scoping Stage

During the site visit conducted as part of the scoping stage of the ESIA process, interviews with two worker representatives, Deputy Head of Iskenderun Fishery Cooperative Central Unit and other fishermen belonging to the cooperative, Iskenderun Mayor and Iskenderun Chamber of Commerce and Industry were also made. The worker representatives informed that all workers are in favor of the privatization of the port as the port currently cannot give service because the government does not make any investment and potential effectiveness of the port can not be utilized. The main concern raised by the fishermen was the loss of fishing grounds with increased anchoring areas as a result of port development and expansion. The Mayor has expressed that traffic increase might be a concern on the existing road infrastructure. Deputy Head of Iskenderun Chamber of Commerce and Industry mentioned the benefits of the privatization of the port to the local market and shared ideas about the current services at the port, but did not raise any concern from the environmental and social point of view.

4.0 STAKEHOLDERS

The purpose of stakeholder identification is to identify and prioritize project stakeholders for consultation. Stakeholder identification is an ongoing process, and thus key stakeholders will be identified during different stages of the project.

Project stakeholders are categorised into two main categories:

- a) Primary stakeholders are the individuals and groups who are affected directly by the project; and
- b) Secondary stakeholders are those parties which have influence on, but are not necessarily directly impacted by the project.

The key primary stakeholder group will be the local communities within the Project area. Other important stakeholders include authorities at national, regional and district level, and non-governmental organizations (NGOs). A stakeholder database has been established including the name of the representatives and contact details of the stakeholders to be used in the SEP implementation stage. This database will be reviewed and updated as the project proceeds. This will include update of the stakeholder register when a new affected person/business/governmental body and/or NGO is identified from submitted comments/grievances during review of comments/grievances. In this case, the stakeholder list will be updated once a month to feed new stakeholders into the list. Otherwise, the stakeholder list will be reviewed once every six months to identify whether there are any new stakeholders, particularly through a search for governmental and non-governmental organisations with responsibilities and interests related to the Project.

4.1 Local Communities

All neighbourhoods belonging to the central Iskenderun are considered which are located within a diameter of approximately 5 km to the Project area. There are 28 neighbourhoods in total namely Guzelcay, Cay, Yunus Emre, Modernevler, Sakarya, Muradiye, Dumlupinar, Savas, Yenisehir, Suleymaniyeye, Hurriyet, Kurtulus, Cumhuriyet, Barbaros, Pinarbasi, Pirireis, Meydan, Baristepe, Yildirimtepe, Kocatepe, Esentepe, Numune, Buluttepe, Gültepe, Gürsel, Fatih Sultan Mehmet, Ismet Inonu and Mustafa Kemal.

Local communities include residents and businesses that may be affected (positively or negatively) by the environmental and social changes as a result of the construction and operation of the Project.

4.2 Land Owners and Users inside the Port

There is an area inside the port that is owned by Turkish Grain Board (TMO) (owned by State) which has its own silos and a conveyor band (to be removed). TMO area was not within the scope of privatization and TMO will continue operation during the construction and operation phases of the port. TMO is included in the list of governmental bodies (see below) as it is owned by the State.

In addition to TMO, there is a shipyard inside the inner port operating under a rent contract for 25 years and two coal processing facilities at the outer port which will stop operation as of the handover.

4.3 Neighbouring Land Users

The port is surrounded by petroleum storage tank farms at the north and a military zone at the southwest which are important stakeholders in the preparation and/or update of emergency action plans as the activities and views of these facilities shall be considered in these plans.

4.4 Governmental Organizations

Governmental organizations can be grouped as national, 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. During the EIA process, opinions of some of the governmental agencies were received as stated in above sections. A list of governmental agencies relevant to the Project has also been prepared in order to contact them during the ESIA process as given below:

GOVERNMENTAL BODIES	
Level	Organization
National	Ministry of Environment and Urbanization, General Directorate of Environmental Impact Assessment, Permitting and Auditing
	Ministry of Environment and Urbanization, General Directorate of Environmental Management
	Ministry of Environment and Urbanization, General Directorate of Spatial Planning
	Ministry of Forest and Water Works, General Directorate of Water Management
	Ministry of Forest and Water Works, General Directorate of Nature Protection and National Parks
	State Hydraulic Works
	Ministry of Labor and Social Security, General Directorate of Labor
	Ministry of Labor and Social Security, General Directorate of Occupational Health and Safety
	Undersecretariat for Maritime Affairs
	Turkish Grain Board
Regional	Adana Regional Directorate of Transportation, Maritime and Communication
	Adana Regional Directorate of Labor and Social Security
	State Hydraulic Works, Adana 6th Regional Directorate
	Turkish Grain Board Iskenderun Regional Directorate
	Mersin Regional Directorate of Undersecretariat for Maritime Affairs
	General Directorate of Highways, 5 th Regional Directorate
Provincial	Hatay Governorship
	Hatay (Antakya) Municipality
	Hatay Provincial Directorate of Environment and Urbanization
	Hatay Provincial Directorate of Forestry and Water Works
	Hatay Provincial Directorate of Agriculture
Hatay Provincial Directorate of Disaster and Emergency	

GOVERNMENTAL BODIES	
Level	Organization
District	Iskenderun District Municipality
	Iskenderun District Local Governorship
	Iskenderun Port Authority, General Directorate of Turkish State Railways
	Iskenderun Military Coast Guard Base

In addition to these bodies, the neighbourhoods that are identified above have administrative units and all of them are represented by an elected Muhtar dealing with administrative matters at the neighbourhoods. Muhtars are considered as a link to the community and they will be asked (through phone contact, and cover letters to be sent together with information leaflets) whether there are any vulnerable groups who may have difficulty in participating to the consultation process due to age, language, literacy or other issues.

4.5 Non-Governmental Organizations

Non-governmental organizations (NGOs) were not contacted during the EIA process. A list of key NGOs that may have interests in environmental and social aspects of the Project is also prepared to be contacted to get their views during the ESIA process as given below:

NON-GOVERNMENTAL ORGANIZATIONS	
Level	Organization
National	Turkish Marine Environment Protection Association (Turmepa)
	Chamber of Environmental Engineers (Ankara Head Office)
	The Union Chambers of Turkish Engineers and Architects (Ankara Head Office)
	Chamber of Turkish Naval Architects & Marine Engineers
Provincial	Hatay Chamber Of Commerce and Industry
	Foundation for Protecting and Publicizing Environmental and Wealth
District	Chamber of Civil Engineers Hatay Branch
	Iskenderun Chamber Of Commerce and Industry
	Iskenderun Environment Protection Association
	Iskenderun Representative Office of Foundation for Protecting and Publicizing Environmental and Wealth
	Iskenderun Fishery Cooperative Central Unit
	Iskenderun Sailing & Water Sports Club
	Iskenderun Branch of Liman-İş Trade Union
Iskenderun Industrialists and Businessmen Association	

5.0 DISCLOSURE OF INFORMATION AND PUBLIC CONSULTATION

Limak will use different consultation approaches and methods for different stages of the project activities and stakeholder groups. The main communication methods and mechanisms that will be used to consult with key stakeholders are:

- Information about the Project and potential impacts to be provided to stakeholders via project leaflets/information documents during the scoping stage
- Meetings with key stakeholders
- Project website (for providing information/updates about the Project)
- Local newspapers (for announcements related to project events and meetings)
- Public meeting to disclose the draft ESIA report
- Monthly meetings for on-going communications

Limak will disclose project information in Turkish language. Electronic copies of Project information pack and Limak's stakeholder consultation programme will be made available at the Limak website. A Project specific website will be established in the next stages of the Project and Limak will update its website regularly to ensure that the local communities and other stakeholders have access to the most up-to-date project information.

As stated in previous sections, the Project has already been gone through an EIA process and is currently at the approval stage by MoEU. During the EIA process, consultation with relevant governmental authorities has been conducted. Therefore, the aim of this SEP is to first focus on consultation with local communities at a close distance to the Project area. Consultation with the stakeholders as identified in the previous section will be carried out as described below:

5.1 Consultation during the ESIA Study

5.1.1. Local Communities

The Project information was officially intended to be provided to the public within the scope of the EIA process through one public consultation meeting held in Iskenderun District. However, there were no attendees at the meeting. In order to inform the local people and get their opinion, household surveys were conducted at the vicinity of the port. The results of the survey showed that the people are aware of the Project and of the 49 people surveyed, 21 of them thinks that port will improve the living conditions in the area. The following consultation activities will be undertaken to ensure that the local communities are informed about the project and its potential impacts:

- A project information pack (including Project Information Document, Project Information Leaflet, Poster, Photo of the Port and Comment/Grievance Form) will be prepared which aims to provide information on the planned operations of the port 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 information pack will include photographs of the existing port for people with low levels of literacy and education.
- The project information pack will be distributed by Limak to headmen of each neighbourhood (28 neighbourhoods as identified) identified in the previous section. The headmen of the neighbourhoods will be contacted via phone prior to sending the information and they will be requested to inform the local residents and businesses in their neighbourhood about the

availability of the project information at the headmen's office, and also to disseminate the project information.

- The project information pack will be also made available in the Limak website (and later on in the Project specific website). The website will also involve information related to Project updates and progress information for the local community.
- All comments received from the local communities will be recorded in the Comment Register that include information on the name and contact details of the person, the comment made and how this has been addressed. The comments will be reviewed weekly by the Project team. In case the comment requires a response, an appropriate response will be developed by the Project team in a month after the submission date of the comment.
- A Grievance mechanism will be established to address grievances of the local people. The details of this mechanism are provided in the following sections.

5.1.2. Land Owners and Users inside the Port

Turkish Grain Board is well aware of the Project and previous contact with TMO has already been made and it has been agreed with TCDD for the removal of the conveyor band located on the main jetty belonging to TMO. Since TMO will continue operation during the Project lifetime and the shipyard has a contract of 25 years, Limak will undertake on-going consultation with them, if deemed necessary, through face-to-face meetings and written correspondence to inform them or to get their views for activities that have the potential to affect the operation of the shipyard and TMO. Related to the coal processing facilities, the existing port authority has already informed the operators on 5 October 2011 that the rent contract will be cancelled unilaterally as of the handover of the port and requested the operator to plan the future actions accordingly. This cancellation article is already included in the rent contracts stating that the renter accepts the unilateral cancellation of the contract beforehand upon privatization or handover of the port as the port is included in the privatization program. Due to this reason, Limak does not plan to carry out consultation with the coal operators. Any contact that is made will be recorded in a register including the date, issue and the result of the correspondence.

5.1.3. Neighbouring Land Users

Limak will undertake consultation with the military base and the petroleum tank farm facilities as deemed necessary, through face-to-face meetings and written correspondence for identifying emergency response measures and to get their views for activities that have the potential to affect their operation.

5.1.4. Governmental Organizations

Identified governmental bodies will be sent the project information pack and asked to comment on the Project, its potential impacts and to provide information that may be important during the ESIA study. In addition to this, meetings will likely to be held with relevant authorities prior to and during construction and operation activities, as deemed necessary based on the need for obtaining relevant consent and permits for the Project. In line with the monitoring requirements defined in the Turkish EIA regulation, quarterly or biannual monitoring reports will be submitted to the MoEU during the construction phase of the Project.

5.1.5. Non-Governmental Organizations

Identified NGOs will be sent the project information pack and asked to comment on the Project, its potential impacts and to provide information that may be important during the ESIA study. Meetings with key NGOs could be carried out as deemed necessary and/or requested.

5.2 Disclosure of the Draft ESIA

Once the draft ESIA report is complete, it will be disclosed in Turkish language (at the Project website and as hard copy at the municipality and the port) for review and comment together with the non-technical summary (NTS) of the draft ESIA which will be prepared as a separate document. The NTS will be sent via mail to stakeholders identified in the previous sections. A public meeting to be announced at least two weeks ago will be held to inform the public about the results of the impact assessment study and which mitigation measures will be implemented. Appropriate comments will be taken into account in finalizing the ESIA.

5.3 Disclosure of Information during Construction and Operation Phases

The consultation activities will continue during the construction and operation phases of the Project as well which will aim to maintain constructive relationships both with the local communities and other stakeholders. These activities are described below:

5.3.1 Construction Phase

- Project specific website will be established during the construction phase and Project information will be disclosed from this website. This website will be updated once a month and as deemed necessary.
- Ongoing meetings, as deemed necessary with national and local authorities will continue during construction phase related to permitting and other issues.
- Management of TMO and shipyard will be notified in case any activity is performed that will have an affect on their operation.
- Ongoing meetings with fishery cooperative will be held if necessary.
- The stakeholder list will be updated regularly and any new stakeholder identified will be included in the list.
- 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 as in accordance with the Grievance Mechanism described in Section 6.
- The security staff at the gates will be trained related to the management of comments and grievances. In case a local person wants to submit a comment or grievance, the security person will be able to either fill comment/grievance forms, or forward the already filled comment/grievance forms to the responsible staff at the port and/or direct the local person to the responsible staff.

5.3.2 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.
- 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
- Ongoing consultation will be held with the management of TMO and shipyard, and fishery cooperative as necessary.
- The stakeholder list will be updated regularly and any new stakeholder identified will be included in the list.
- As community health and safety is a key impact with regard to operational activities, communities will be notified and informed about the project risks and impacts during emergency situations.
- All comments and grievances will be managed in accordance with the Grievance Mechanism described in Section 6.
- The security staff at the gates will continue to collect comments and grievances as described in the construction phase above.

5.4 Indicative SEP Timeline

The following timetable is proposed for the disclosure and consultation activities:

Milestone	Schedule
Preparation of Project information pack	Early December 2011
Sending out Project information pack to identified stakeholders	Mid December 2011
Preparing Limak website	Mid December 2011
Meeting with land users inside and outside the port	Ongoing as needed and

6.0 GRIEVANCE MANAGEMENT

A grievance management system will be established in order to ensure that all comments, suggestions and objections received from the project stakeholders especially from local communities that are mostly affected by the project are dealt with appropriately and in a timely manner.

Local communities will be informed about the grievance management system during the consultation and disclosure activities. All grievances will be recorded, and responded and resolved in a defined timeframe. A Comment/Grievance Form is presented in Annex A. Comments and grievances can be

sent to Limak via mail, e-mail, and fax during the construction and operation stages as well as through the Project website and telephone.

The procedure to handle grievances is described below:

1. All grievances submitted by the stakeholders in verbal and written will be considered. Verbal grievances will be written on grievance forms by the responsible person as defined below.
2. All grievances will be reflected in a grievance log to ensure that each grievance is assigned an individual number and that consistent tracking and corrective actions are carried out. The grievance log will contain:
 - Date of submission of the grievance
 - Reference number
 - Contact details of the complainant
 - Content of the grievance
 - Identification of parties responsible for the resolution
 - Dates when the investigation was initiated and completed
 - Findings of the investigation
 - Proposed corrective action
 - Date of response sent to the complainant (unless it is anonymous)
 - Statement of satisfaction of the complainant
 - Date of closing out the grievance
 - Any outstanding actions for non-closed grievances
3. The grievance will be evaluated by the relevant staff and management to identify what actions need to be taken, and an appropriate response will be developed. The complaint action form will be filled in as presented in Annex B.
4. The complainant will be informed about the proposed corrective action in writing and the date of response to the complainant will be recorded in the grievance log,
5. The complainant will be contacted through telephone or face-to-face meeting, if needed to confirm that the proposed corrective action taken is satisfactory, and the complainant's response will be recorded in the grievance log,
6. The grievance will be closed out and the close out date will be recorded, if the complainant is satisfied with the action taken. If not, further assessment is needed and reevaluation of the grievance is required.
7. It is envisaged that the grievances will be resolved within one month after receipt. If this is not possible, the complainant will be informed about the progress on a regular basis.
8. Any grievances related to subcontractors' activities will be managed in line with the mechanism described here.

In addition to grievances, comments will be reviewed once a week to identify if they require a response. Comments will be reflected to a comment log that will include information on the date of the comment submission, details of the person submitting the comment, issue of comment, response required or not, and date of response.

7.0 RESOURCES AND RESPONSIBILITIES

The ESIA Team will be responsible for planning and managing stakeholder engagement during the ESIA process in consultation with Limak. Limak will be represented by the following contacts during the ESIA process:

Hatice Çınar – HSE Manager

Address: Hafta Sok. No: 9 GOP Ankara

Phone: +90 312 446 88 00

E-mail: hcinar@limak.com.tr

Veysel Bayık – Limak Representative at the Port

Address: TCDD Liman İşletmesi Müdürlüğü İskenderun

Phone: +90 538 340 79 11

E-mail: ybayik@limak.com.tr

After completion of the Draft ESIA, Limak will be responsible for managing the stakeholder engagement process and handling with comments and grievances. Limak will appoint an Environment-Health and Safety Manager who will be responsible in managing stakeholder engagement activities and grievance system. HSE Manager will directly report to the General Manager who will be the main responsible for these activities.

8.0 REPORTING

All comments and complaints received will be recorded in a comment log and grievance log, respectively. All these will be evaluated and reported by Limak on a monthly basis during the construction and operation phases.

ANNEX A

Comment/Complaint Form

ISKENDERUN PORT EXPANSION PROJECT - COMMENT/COMPLAINT FORM

8.1.1.1.1.1.1 INFORMATION ABOUT THE PERSON SUBMITTING COMMENT AND/OR COMPLAINT
(Please leave blank if you wish to remain anonymous. Your comments/complaints will still be considered by Limak.)

Full Name:

Date:

Contact Information: (Please provide necessary information based on how you wish to be contacted)

By mail

By phone

By e-mail.....

Indicate your purpose: Comment Complaint

Recorded by: Person submitting comment/complaint
 Other (please specify who)

**Signature confirming receipt of
completed Comment/Complaint Form
copy**

.....

8.1.1.1.1.1.2 YOUR COMMENTS ON THE PROJECT (Continue on the back of the sheet if required)

INFORMATION ABOUT YOUR COMPLAINT

Describe the Complaint: (Continue on the back of the sheet if required)

Date of Incident Regarding Complaint

- One time incident/grievance (Date
- Happened more than once (how many times?
- On-going (currently experiencing problem)

What would you propose to resolve the problem? (Continue on the back of the sheet if required)

This section will be filled by Limak

STATUS OF COMMENT

Comment Logged (Y/N)	Date of submission:	Logged by:
	Date of response sent:	
STATUS OF COMPLAINT		
Complaint Logged (Y/N)	Date of submission:	Logged by:
Date of Response sent:	Complaint closed (Y/N):	Close out date and signature:

ANNEX B

Complaint Action Form

(to be used by Limak)

COMPLAINT ACTION FORM

Information about the complainant		
<i>8.1.1.1.1.1.4</i> The reference number		
Date of grievance submission		
Describe all the details relevant to the complaint		
Describe apparent cause of incident		
Immediate action required		
Identify preventative action (if required)		
<i>Continue on seperate sheets as required.</i>		
Desicion of the measures to be taken by HSE responsible	Name	Signature and date
<i>8.1.1.1.1.1.5</i> Person responsible	Name	Signature and date

Completion by	Name	Signature and date
Verification by	Name	Signature and date