



**TOSYALI OSMANİYE SOLAR POWER PLANT PROJECT
LIVELIHOOD RESTORATION PLAN
January 2026
CNR-PLN-TOS-OSM-LRP-001
(Final)**

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 2 / 91



Bağlıca Mah. Çambayırı Cad. Çınar Plaza No:66/5 06790 Etimesgut/ ANKARA

Tel: +90 312 472 38 39 Fax: +90 312 472 39 33

Web: cinarmuhendislik.com

E-mail: cinar@cinarmuhendislik.com

All rights of this report are reserved.

All or part of this report cannot be reproduced, copied, electronically reproduced, traded, transmitted, sold, rented, used for any purpose, or used in any form and method in digital and/or electronic media without written permission from Çınar Mühendislik Müşavirlik A.Ş. as per the Law No. 5846 on Intellectual and Artistic Works amended with the Law No. 4110.

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 3 / 91

DOCUMENT REVISION HISTORY SHEET

Rev.	Date	Prepared by	Checked by	Approved by	Description
00	11.04.2025	ÖZGE ÇELİK	Kübra ÖZSOY	Ayşe CANBAZ AKKURT Ali YILMAZ	Draft
01	28.04.2025	Özge ÇELİK	Kübra ÖZSOY	Ayşe CANBAZ AKKURT	Rev.01
02	16.05.2025	Özge ÇELİK	Kübra ÖZSOY	Ayşe CANBAZ AKKURT	Rev.02
03	04.06.2025	Özge ÇELİK	Kübra ÖZSOY	Ayşe CANBAZ AKKURT	Rev.03
04	03.07.2025	Kübra ÖZSOY	Özge ÇELİK	Ayşe CANBAZ AKKURT	Rev.04
05	07.11.2025	Özge ÇELİK	Kübra ÖZSOY	Ayşe CANBAZ AKKURT	Rev.05
06	12.01.2026	Özge ÇELİK	Kübra ÖZSOY	Ayşe CANBAZ AKKURT	Final

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 4 / 91

TABLE OF CONTENTS

TABLE OF CONTENTS	4
LIST OF TABLES	6
LIST OF FIGURES	7
ABBREVIATIONS/DEFINITIONS	8
EXECUTIVE SUMMARY	10
1 INTRODUCTION	11
1.1 Scope and objective.....	11
1.2 Methodology.....	11
1.2.1 Desktop studies.....	11
1.2.2 Scoping studies.....	11
1.2.3 Baseline studies.....	11
1.2.4 Livelihood Restoration Plan Initial Study.....	12
1.2.5 Livelihood Restoration Plan Implementation Study.....	12
1.2.6 Further Studies.....	12
1.3 Regulatory Framework.....	13
1.3.1 National Legislation.....	13
1.3.2 International Requirements.....	14
1.3.3 Applicable Policies and Practices of the Project Company.....	16
2 PROJECT DESCRIPTION	17
2.1 Project owner and location.....	17
2.2 Scope of the Project.....	17
2.3 Land use of the Project.....	17
2.4 Project Phase and Components.....	19
3 BASELINE CONDITIONS	21
3.1 Interview results with Yörük families.....	21
3.2 Other observations.....	23
3.3 Yörüks in line with Intangible Cultural Heritage.....	24
3.4 Evaluation of Yörüks in accordance with PS7 Indigenous People.....	28
3.5 Disadvantaged/Vulnerable Individuals or Groups (DVIG).....	32
3.6 Proposed Strategy to Incorporate the View of Yörüks.....	33
4 PROJECT IMPACTS AND IDENTIFIED STAKEHOLDERS	35
4.1 Impact Assessment Methodology.....	35
4.2 Impact Assessment.....	37

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 5 / 91

4.2.1	Pre-construction (Prior to land entry/land clearance).....	37
4.2.2	Land preparation and construction	37
4.2.3	Operation	38
4.2.4	Decommissioning.....	38
4.3	Cumulative Impact Assessment.....	38
4.4	Impact Significance and Mitigation Measures	40
5	PRINCIPLES AND APPROACH FOR LRP	44
6	PRELIMINARY IMPLEMENTATIONS	45
7	ENTITLEMENT AND ELIGIBILITY CRITERIA.....	47
7.1	Cut-off date	47
7.2	Affected individuals	47
7.3	Entitlement Matrix	47
8	GRIEVANCE MECHANISM	51
8.1	GM contact information	51
9	ROLES AND RESPONSIBILITIES	53
10	IMPLEMENTATION BUDGET	55
11	MONITORING AND REPORTING.....	59
	APPENDICES	62
	Appendix 1 Grievance Registration Form.....	62
	Appendix 2 Grievance Closeout Form	64
	Appendix 3 Grievance Log.....	65
	Appendix 4 Photographs taken during the meeting.....	70
	Appendix 5 Documents related to public participation meeting, 28.01.2025.....	77
	Appendix 6 Documents related to livelihood restoration for Yörük families.....	82
	Appendix 7 Area recommended by Project Owner.....	85

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 6 / 91

LIST OF TABLES

Table 1. National Legislation	13
Table 2. Osmaniye ETL Expropriation Area.....	18
Table 3. Stakeholder consultations prior to livelihood restoration activities	27
Table 4: Evaluation of Yörüks in accordance with PS7 Indigenous People	29
Table 5. Magnitude Factors and Scales	35
Table 6. General Criteria for Identification of Receptor Sensitivity and Impact Magnitude Levels	36
Table 7. Impact Significance Matrix.....	36
Table 8. Valued Environmental and Social Components to be considered in CIA.....	38
Table 9. Other Facilities and Their Air Distances to the Project Area.....	39
Table 10. Future Acts in Aol of the Project	39
Table 11. Impact Significance and Mitigation Measures	42
Table 12. Entitlement Matrix.....	47
Table 13. Monitoring and Reporting.....	60

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 7 / 91

LIST OF FIGURES

Figure 1. Alternative Re-Location Areas46

Figure 2. Organizational Structure of the Project Owner53

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 8 / 91

ABBREVIATIONS/DEFINITIONS

A.Ş.	Incorporated Company
AoI	Area of Influence
BAT	Best Available Techniques
CESCE	Spanish Export Credit Agency
CIA	Cumulative Impact Assessment
ÇİMER	Presidential Communication Center
ÇINAR / Consultant	Çınar Mühendislik Müşavirlik A.Ş.
CLO	Community Liaison Officer
DVIG	Disadvantaged/Vulnerable Individuals or Groups
E&S	Environmental and Social
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
EIGE	European Institute for Gender Equality
EP	Equator Principles
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
ETL	Energy Transmission Line
EU	European Union
FI	Financial Intermediaries
FRA	Agency for Fundamental Rights
GBV	Gender-Based Violence
GHG	Greenhouse Gas
GM	Grievance Mechanism
GRM	Grievance Redress Mechanism
ICCPR	International Covenant on Civil and Political Rights
ICESCR	International Covenant on Economic, Social and Cultural Rights
IFC	International Finance Corporation
ILO	International Labour Organization
km	Kilometers
KPI	Key Performance Indicator
KVKK	Personal Data Protection Law
LRP	Livelihood Restoration Plan
No.	Number
OECD	Organization for Economic Co-operation and Development
OHS	Occupational Health and Safety
OIZ	Organized Industrial Zone
O&M	Operation and Maintenance
OOSB	Osmaniye Organized Industrial Zone
PAP	Project Affected Parties
Project	Tosyalı Osmaniye Solar Power Plant Project

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 9 / 91

PS	Performance Standards
PV	Photovoltaic
RAP	Resettlement Action Plan
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SPP	Solar Power Plant
TBMM	Grand National Assembly of Türkiye
TEİAŞ	Turkish Electricity Transmission Company
Tosyalı / Project Owner	Tosyalı Demir Çelik Sanayi A.Ş.
TRY	Turkish Lira
UK	United Kingdom
UN	United Nations
UNHCR	The United Nations High Commissioner for Refugees
VESC	Valued Environmental and Social Components
WBG	World Bank Group
YEKA	Renewable Energy Resource Areas
YİMER	Foreigners Communication Center
YÖRSİAD	Yörük Industrialists and Businesspeople Association (Yörük Sanayici ve İş İnsanları Derneği)

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 10 / 91

EXECUTIVE SUMMARY

Tosyalı Demir Çelik Sanayi A.Ş. (Tosyalı or the Project Owner) plans to develop the Osmaniye Solar Power Plant (SPP) Project (the Project) to establish a sustainable energy infrastructure based on renewable energy sources. This strategic investment aims to enhance the Project Owner's energy independence, reduce carbon emissions, and optimize long-term energy costs.

The Project area, located on lot 246 and parcel 2 (246/2) in Türkmen/Büyüktüysüz Village of Toprakkale district, Osmaniye province. It is approximately 15 km away from the center of Osmaniye province and about 8 km from the center of Toprakkale district. The Project area is approximately 60 km away from the center of Hatay province, measured as air distance.

The Project site, Lot 246, Parcel 2, is located within the boundaries of the Cebelibereket Erzin Energy Specialized Industrial Zone. The Project will be carried out within the scope Article 5.1.h of the Unlicensed Electricity Generation Regulation, and the Project area was excluded from the scope of Renewable Energy Resource Areas (YEKA) in line with the decision numbered 8697 dated on 01.07.2024 (Official gazette number: 32590 and date: 02.07.2024).

Lot 246/Parcel 2 where the Project area is located within the Cebelibereket Erzin Energy Specialized Industrial Zone, but it is excluded from YEKA with the decision number of 8697. The Project area has been allocated to the Project Owner.

The area designated for the construction of the Project is registered as "field" in title deed. The ownership of the Project area is held by the Project Owner. Lot 246, Parcel 2 is declined as non-agricultural land with the letter of Osmaniye Governorship Provincial Directorate of Agriculture and Forestry dated 03.01.2025 and numbered 17389815.

The Project aligns with Türkiye's Environmental Impact Assessment (EIA) Regulation, and an "EIA Positive Certificate" is obtained on 23.01.2025 with the decision no of 8155. It also adheres to international standards, including the Equator Principles IV and International Finance Corporation (IFC) guidelines, ensuring that global best practices will be applied.

Tosyalı is expecting to secure financing for the Osmaniye SPP Project from the Spanish Export Credit Agency (CESCE) and the Project is expected to be financed by Banco Bilbao Vizcaya Argentaria (BBVA). Therefore, the Project must comply with the environmental and social policies of CESCE and BBVA. In this regard, an agreement was signed, between the Project Owner and ÇINAR Engineering Consulting Inc. (ÇINAR / Consultant) for the preparation of environmental and social reports. This agreement defines the tasks to be carried out by ÇINAR.

In line with these tasks, an Environmental and Social Impact Assessment Plan (ESIA) report has been prepared with its sub-management plans. This Livelihood Restoration Plan (hereinafter referred to as the "Plan"), prepared as part of the ESIA package, has been developed to assess the physical and economic displacement impacts of the Project.

Within the Project site, there are 3 Yörük households who are informally residing on a temporary basis and derive a portion of their livelihoods from this area. This Plan, developed to outline the methods and their justifications for mitigating current income losses of these households, is limited in scope to the Yörük families.

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 11 / 91

1 INTRODUCTION

1.1 Scope and objective

This Livelihood Restoration Plan (LRP) has been prepared for the Yörük community living in the project area, whose livelihoods will be adversely affected by the planned Solar Power Plant (SPP) project in the Toprakkale, Osmaniye by Tosyalı.

The project is expected to create economic displacement impacts on the Yörük community, who rely on activities such as small-scale livestock farming and scrap dealing. This report has been prepared in accordance with Equator Principles (EP 4), IFC Performance Standard 5 and the environmental and social standards of CESCE.

The primary objective of the Plan is to preserve and, if possible, improve the livelihoods of the affected communities. In this regard, livelihood restoration strategies developed through participatory methods, along with entitlement criteria, a monitoring plan, and budget, are presented within this report.

1.2 Methodology

The following methods have been used in the preparation of the LRP.

1.2.1 Desktop studies

In consideration of the Area of Influence (AoI), within the scope of the Project, the area 3,000 meters away from the project area was identified as AoI of the Project to include the sensitive receptors and close settlements.

Within this AoI, the tents have been identified as sensitive receptors in collaboration with Yolbulan-Baştuğ Vocational and Technical Anatolian High School.

1.2.2 Scoping studies

As of November 2024, in the field study conducted under ESIA scoping report, it was determined that the individuals using these tents are Yörük households, and consultations were held with them.

During these meetings, it was understood that they may experience livelihood loss, and they have been included in the assessment as vulnerable groups within the scope of the Project's impacts.

Due to their status as sensitive receptors, it was deemed appropriate to assess them as vulnerable groups within the scope of the project.

A representative of one of the households with whom face-to-face interview was conducted reported that, in addition to their own family, two other Yörük households are staying in the area. They mentioned that some of the tents visible on the maps are used as homes, while others are used as barns for goats and kids.

1.2.3 Baseline studies

During the scoping report process, only the representative of one of the three Yörük households was interviewed.

The consultations were repeated as part of the ESIA social baseline studies. As of January, 2025, within these social studies, representatives of the 3 Yörük households were consulted, and information was gathered about their socio-economic characteristics.

Consultations were held with the representatives of the other households, along with the representative of the first household. In these studies, aimed at gathering information about

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 12 / 91

the socio-economic structure of the households, the face-to-face in-depth interview technique was applied.

1.2.4 Livelihood Restoration Plan Initial Study

In order to fulfill the IFC PS5 requirement as that the entire resettlement and restoration process be based on voluntary principles and that communities are provided with sufficient information about their rights, a consultation meeting has been planned.

In this regard, a meeting has been organized in which the Yörük families will also participate. It was announced that a consultation meeting would be held at point Project area on 28.01.2025, and in accordance with the announcement, the consultation meeting was held on the specified date and location. Representatives of the Yörük households, the Project Owner's representative, the OIZ director and OIZ staff, the ÇINAR social team, and some individuals who come to the area to purchase livestock from the Yörük families attended the meeting. In the meeting held for its intended purpose, the expectations of the Yörük families regarding the improvement of their livelihoods were collected by the Project owner.

1.2.5 Livelihood Restoration Plan Implementation Study

The fundamental principles of livelihood restoration aim to protect and, if possible, improve the living standards of individuals who have lost their livelihoods.

During the consultations held at the consultation meeting dated 28.01.2025 (please see Appendix 5 Documents related to public participation meeting, 28.01.2025) it was learned that the Yörük households requested relocation support to move out of the project area and material support for the new tents they would set up at their new location. Their views and suggestions regarding possible relocation areas were gathered, and the relevant areas were visited after the meeting. Following the meeting and site visit, a suitable area was identified, and work has begun to make it livable for the Yörük families. The materials for the tents were purchased by the Project Owner and delivered to the Yörük households (please see Appendix 6 Documents related to livelihood restoration for Yörük families).

1.2.6 Further Studies

After the relocation of all the Yörük households, the Project activities will begin, and the entry of the Project Owner and its Contractor / sub-contractor into the site will be initiated.

Consultations with the Yörük households will continue in the area to which they have relocated, using the methods described under the scope of Project-specific Stakeholder Engagement Plan (SEP). Their views, suggestions, and complaints / grievances will be documented through the Grievance Mechanism (GM) defined in the SEP. The results of implementing the LRP will be monitored. During this process, meeting notes and GM records will serve as the primary tools.

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 13 / 91

1.3 Regulatory Framework

1.3.1 National Legislation

In Turkish legislation, there is no direct requirement for livelihood restoration. The provisions provided in Table 1 from the Constitution of the Republic of Türkiye and Turkish Civil Code serve as examples of basic provisions related to the protection of immovable property and personal rights. The Expropriation Law provides detailed information on land acquisition. However, in this project, the area to be used as the project site has been officially assigned to the project owner. There is no need for any implementation under the expropriation framework. The individuals who will be resettled and evaluated within the Livelihood Restoration Plan are informal users of this land.

Table 1. National Legislation

Regulation	Date	Number	Relevance
<i>The Constitution of the Republic of Türkiye</i>	09.11.1982	2709	-
Fundamental Characteristics of the State		Article 2	The Republic of Türkiye is a democratic, secular, and social state governed by the rule of law.
Equality Principle		Article 10	Everyone is equal before the law, without discrimination on the grounds of language, race, color, sex, political opinion, philosophical belief, religion, sect, or any other grounds.
Freedom of Thought and Opinion	-	Article 25	Everyone has freedom of thought and opinion, no one shall be compelled to reveal his/her thoughts and opinions for any reason or purpose; nor shall anyone be blamed or accused because of his/her thoughts and opinions.
Freedom of Expression and Dissemination of Thought	-	Article 26	Everyone has the right to express and disseminate his/her thoughts and opinions by speech, in writing or in pictures or through other media, individually or collectively. This freedom includes the liberty of receiving or imparting information or ideas without interference by official authorities.
Right to Education		Article 42	No one shall be deprived of the right to education and learning. Education is under the supervision and control of the state and is free of charge
Protection of Minorities		Article 44	The protection of minorities, in accordance with the relevant provisions of international treaties, shall be ensured
Right to Live in a Healthy Environment		Article 56	Everyone has the right to live in a healthy and balanced environment. The state shall ensure that the environment is protected and improve the quality of life.
Turkish Citizenship		Article 66	No one shall be deprived of Turkish citizenship, except by reasons stipulated by law. Turkish citizenship confers the right to be a Turkish citizen
Right of Petition	-	Article 74	Citizens and foreigner resident in Türkiye, on the condition of observing the principle of reciprocity, have the right to apply in writing to the competent authorities and to the Grand National Assembly of Türkiye (TBMM) regarding the requests and complaints concerning themselves or the public.
International Treaties		Article 90	International agreements duly put into effect have the force of law. However, in case of a conflict between the international agreements and domestic laws, the provisions of international agreements shall prevail.

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 14 / 91

Regulation	Date	Number	Relevance
Turkish Civil Code	01.01.2002	4721	-
Equality Before the Law		Article 2	“Equality Before the Law” protects individuals' rights and ensures that no discrimination occurs, guaranteeing equal treatment for all citizens.
Property Right		Article 683	“Property Right” defines the concept of property, including real estate, and grants full rights to the owner over their property. It is one of the fundamental provisions related to ownership under the Civil Code.
Unlimited Nature of Property		Article 715	“Unlimited Nature of Property” establishes that property ownership is generally unrestricted but acknowledges that limitations may be imposed in cases of public necessity, such as expropriation.
Possession		Article 722	“Possession” protects the rights of those who possess a property, even if they are not the official owners, by giving them the right to use and benefit from it.
Inheritance Right		Article 727	“Inheritance Right” regulates the transfer of property ownership after the owner's death, ensuring that their wishes are followed in terms of inheritance.

1.3.2 International Requirements

International standards relevant to LRP are as follows:

Equator Principles

The Equator Principles (EPs) are a globally recognized risk management framework utilized by financial institutions to assess and manage E&S risks in project financing. Financial institutions that have adopted the Equator Principles require project developers and their contractors to adhere to the EPs for E&S risk management throughout the project lifecycle. These requirements encompass a broad range of issues, including labor rights, environmental protection, community health and safety, and stakeholder engagement. The Equator Principles are provided below:

- Principle 1: Review and Categorization
- Principle 2: Environmental and Social Assessment
- Principle 3: Applicable E&S Standards
- Principle 4: E&S Management System and Equator Principles Action Plan
- Principle 5: Stakeholder Engagement
- Principle 6: Grievance Mechanism
- Principle 7: Independent Review
- Principle 8: Covenants
- Principle 9: Independent Monitoring and Reporting
- Principle 10: Transparency and Reporting

IFC Performance Standards

IFC has established Environmental and Social Performance Standards to define its customers' responsibilities for managing their environmental and social risks. Throughout the investment period, the borrower must comply with these standards. The IFC Performance Standards (2012) are listed below:

- PS1: Assessment and Management of Environmental and Social Risks and Impacts

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 15 / 91

- PS2: Labor and Working Conditions
- PS3: Resource Efficiency and Pollution Prevention
- PS4: Community Health, Safety and Security
- PS5: Land Acquisition and Involuntary Resettlement
- PS6: Conservation of Biodiversity and Sustainable Management of Living and Natural Resources
- PS7: Indigenous Peoples
- PS8: Cultural Heritage

Spanish Export Credit Agency (CESCE) Standards

CESCE incorporates risk assessment protocols aligned with international frameworks such as the Organization for Economic Co-operation and Development (OECD) Common Approaches and the IFC Performance Standards. These frameworks ensure that CESCE's operations promote sustainable economic growth while maintaining robust E&S safeguards.¹

The OECD Council Recommendation on Officially Supported Export Credits and Environmental and Social Due Diligence (Common Approaches, 20162) provides guidelines for assessing and managing the E&S impacts of projects financed by official export credits. The OECD Common Approaches are given below:

- Screening
- Classification
- Environmental and Social Review
- Evaluation, Decision and Monitoring
- Exchange and Disclosure of Information
- Reporting and Monitoring of The Recommendation

Other Applicable International Guidance

- World Bank Group (WBG) General EHS Guidelines
- WBG EHS Guidelines: Electric Power Transmission and Distribution
- WBG EHS Guidelines: Construction and Decommissioning
- European Union (EU)
 - Best Available Techniques (BAT) BREF Notes
 - European Convention for the Protection of Human Rights and Fundamental Freedoms
 - European Institute for Gender Equality (EIGE)
 - European Union Agency for Fundamental Rights (FRA)
- United Nations (UN) Guiding Principles on Business and Human Rights
 - United Nations International Covenant on Economic, Social and Cultural Rights
 - United Nations Text on Increasing Women's Employment and Promotion of Equality in Opportunities
 - United Nations International Covenant on Economic, Social and Cultural Rights (ICESCR)
 - United Nations International Covenant on Civil and Political Rights (ICCPR)

¹ Source: CESCE, [Who we are - Cesce Spain](#)

² Source: <https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0393>

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 16 / 91

It should be noted that while there are international agreements that address indigenous peoples' rights, they do not directly align with Türkiye's constitution.

- ICCPR and ICESCR, both of which Türkiye has ratified, prohibit discrimination and guarantee equality. However, they do not specifically provide for indigenous peoples' rights.
- International Labour Organization (ILO) Convention No. 169 on Indigenous and Tribal Peoples, which Türkiye has not ratified, provides special protections and recognition for indigenous peoples' rights. However, Türkiye has not signed this convention.

1.3.3 Applicable Policies and Practices of the Project Company

The Project Standards are established through the intersection of relevant national legislation and international standards. In instances where different criteria exist, the more stringent requirement is adopted, to ensure compliance with both national and international standards.

In this context, the Project Standards take into consideration all relevant national regulations, the IFC PSs, the EP 4, CESCE Standards, and any pertinent international agreements to which Türkiye is a signatory. These standards establish the legal framework for E&S and Occupational Health and Safety (OHS) management of the Project, ensuring the protection of workers, the environment, and the local community.

The Project Owner and all contractors engaged in the Project are required to comply with the Project Standards. The Project Owner will ensure compliance with the Project Standards, including both national legislation and international standards outlined in this chapter, through contractual obligations, inspections, and performance monitoring.

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 17 / 91

2 PROJECT DESCRIPTION

2.1 Project owner and location

Osmaniye SPP Project is being developed by Tosyalı (the Project Owner) and will be established on lot 246 and parcel 2 (246/2) in Türkmen/Büyüktüysüz Village of Toprakkale district, Osmaniye province. It is approximately 15 km away from the center of Osmaniye province and about 8 km from the center of Toprakkale district. The Project area is approximately 60 km away from the center of Hatay province, measured as air distance.

The Project area is within the boundaries of the Cebelibereket Erzin Energy Specialized Industrial Zone. The Project will be carried out within the scope Article 5.1.h of the Unlicensed Electricity Generation Regulation, and the Project area was excluded from the scope of YEKA in line with the decision numbered 8697 dated on 01.07.2024 (Official gazette number: 32590 and date: 02.07.2024).

2.2 Scope of the Project

The Project Owner plans to develop the Project to establish a sustainable energy infrastructure based on renewable energy sources. This strategic investment aims to enhance the Project Owner's energy independence, reduce carbon emissions, and optimize long-term energy costs.

The Project will install 166,292 Monocrystalline Half-Cut photovoltaic modules, each with 725 Wp capacity. The generated direct current energy will be converted into alternating current using inverters, producing approximately 245 million kWh of electricity annually. The main components of the Project consist of photovoltaic (PV) modules, mounting structures, inverters, energy transmission line (ETL), access road and internal road, transformers, administrative building, storage area, and switchyard. The land preparation and construction phase are expected to last 12 months, with a planned operational lifespan of 25 years. Workforce requirements include 350 workers during the land preparation and construction phase and 25 personnel during the operation. Energy generation currently accounts for over 40% of global greenhouse gas emissions, primarily due to reliance on fossil fuels.

By utilizing renewable energy sources, this Project will contribute to climate change mitigation efforts, promoting a cleaner and more sustainable energy future. This also aligns with the Project Owner's environmental responsibility and sustainability vision.

2.3 Land use of the Project

The Project site, Lot 246, Parcel 2, is located within the boundaries of the Cebelibereket Erzin Energy Specialized Industrial Zone. The Project will be carried out within the scope Article 5.1.h of the Unlicensed Electricity Generation Regulation, and the Project area was excluded from the scope of YEKA in line with the decision numbered 8697 dated 01.07.2024 (Official gazette number: 32590 and date: 02.07.2024)

Lot 246/Parcel 2 where the Project area is located within the Cebelibereket Erzin Energy Specialized Industrial Zone, but it is excluded from YEKA with the decision number of 8697. The Project area has been allocated to the Project Owner.

The Project covers an area of 147.28 hectares and is designed with a total installed capacity of 120.56 MWp /88 MWe.

Ancillary facilities within the scope of the Project include the temporary construction site (rest, dining and break area for workers, social facilities, offices etc.). The mobilization areas, temporary construction site consisting of rest, dining and break areas for workers, social

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 18 / 91

facilities, offices, and other support units are considered as ancillary facilities. Those facilities will be within the Project's allocated parcel. There will be no worker accommodation within the Project area. Therefore, there is no additional physical and economic resettlement impact caused by land use for these structures. Current information regarding accommodation is presented in Section 5.12.7 Accommodation Management of ESIA.

The ETL to be constructed as an associated facility will be connected to existing 154 kV İvizler ETL belonging to Turkish Electricity Transmission Company (TEİAŞ). TEİAŞ notified its Connection Opinion, Connection Agreement Call Letter, with an official letter dated 03.07.2024 numbered 2547951, and the Connection Agreement between TEİAŞ and Tosyalı was signed on 24.12.2024.

The location of the substation and the ETL alignment are largely shaped by the TEİAŞ Connection Agreement, which defines the national grid node to which the Project must be connected. The length of the ETL will be 1.6 km input and output (3.2 km in total). The 1,6 km-long (input and output) 154 kV ETL, which will be connected to existing 154 kV İvizler ETL belonging to TEİAŞ. Mast Enerji ve Teknolojileri A.Ş. (Mast) responsible for the construction (foundation excavation, lower and upper installation, conductor pulling) of the ETL of the Project. However, the specific ETL route was typically not finalized at the time of this agreement and evolved during the permitting and design process. This iterative optimization process ensures continuous refinement for technical and environmental suitability, while fostering transparency with stakeholders.

The Project design of the ETL route has been completed and Project Approval was secured on 08.04.2025 by Ministry of Energy and Natural Resources, TEİAŞ Transmission Lines Installation Department. Moreover, regarding the ETL (154 kV İvizler TC-Osmaniye OIZ TC ETL (1.6 km input-output)) of the Project, an "EIA Out of Scope" Decision was made by the Hatay Provincial Directorate of Environment, Urbanization and Climate Change on 21.04.2025 with the official letter number of 12311155.

Total area for ETL line is given in Table 2.

Table 2. Osmaniye ETL Expropriation Area

	Erzin Municipality	Osmaniye Toprakkale District	Total ETL
Pylon Area	841.08 m ²	2,507.93 m ²	3,349 m ²
Expropriation Area	841.08 m ²	2,507.93 m ²	3,349 m ²
Easement Area (for pasture lands)	5,363.28 m ²	88,663.21 m ²	94,026.49 m ²
Number of Poles	2	12	14
Clearance Area (Easement + Pole)	6,204.36 m ²	91,171.14 m ²	97,790.21 m ²

Given that TEİAŞ has formally granted land use rights to Tosyalı under easement rights for the ETL corridor, temporary access routes required for construction are considered to fall within the scope of this permission framework and therefore do not trigger any additional land acquisition actions. The existing easement rights already cover the access and usage requirements necessary for the construction and operation of the ETL. Accordingly, the temporary use of public lands such as pasture or treasury land does not require separate expropriation or permitting procedures. While temporary access across privately owned or cultivated land could, in principle, necessitate additional permits or compensation arrangements, such circumstances are not anticipated. Therefore, preparation of a RAP/LRP or a RAP/LRP addendum for ETL-related land acquisition is not required.

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 19 / 91

In the area where the Osmaniye ETL line is currently under development, existing service and maintenance routes of the current ETL network will be prioritized for access. If new access routes are needed, temporary roads will be opened within the ETL corridor and levelled or smoothed only as required for safe vehicle access; no grading or permanent alterations will be undertaken. Following the completion of tower erection and conductor installation works, all temporary access areas will be restored to their original condition and left to return to their natural state.

No formal or informal land users, including Yörüks, have been identified in the ETL area. Therefore, Project activities in this area are not expected to have any direct impact on either the Yörüks or other PAPs in the region. Nevertheless, measures will be implemented to ensure that Yörük families and the local community are not prevented from carrying out activities in these areas in the future. These measures can be listed as;

- Use the same designated Project access road as the main entry point for the ETL to minimize land disturbance.
- Plan and construct only temporary service roads, avoiding permanent alterations to pastureland for the ETL.
- Rehabilitate and restore pasture areas after construction activities are completed for the ETL.
- Provide safe crossings or controlled passage for community members, especially Yörüks, during periods of heavy vehicle movement for the ETL construction.

As a result, there is no additional physical or economic resettlement impact associated with land use for the ETL, and the LRP does not cover ETL areas.

If formal or informal use is identified, it should be addressed within the scope of the LRP as Resettlement Action Plan (RAP)/LRP or RAP/LRP addendum. The LRP to be implemented at the Project site should be extended to cover the ETL within RAP/LRP or RAP/LRP addendum.

2.4 Project Phase and Components

The construction and assembly phase of the Project is expected to take 12 months, with an anticipated economic lifespan of 25 years. During the construction phase, it is expected to employ 350 workers, while 25 personnel will be working during the operation phase.

Within the scope of the Project, pre-construction, mobilization and temporary construction site establishment works, land preparation works, construction activities, installation of mounting structures and solar panels, installation of switchgear center, electrical connections, connections to the national grid system and transition to operation/commissioning will be carried out.

In Tosyalı Osmaniye SPP Project, Monocrystalline Half-Cut Photovoltaic Modules will be used to generate direct current (DC) electricity. The generated energy will be converted into alternating current (AC) through high-efficiency inverters and integrated into the national grid. A total of 166,292 tracker panels (725 Wp each) are planned to be installed under the proposed Project. The components are Tracker Panels and System, Monocrystalline Photovoltaic Cells, and TOPCon Modul.

Associated facilities within the scope of the Project include the 1,755 m-long 154 kV ETL. The mobilization areas, temporary construction site consisting of rest, dining and break areas for workers, social facilities, offices, and other support units are considered as ancillary facilities. Those facilities will be within the Project's allocated parcel. There will be no worker accommodation within the Project area.

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 20 / 91

The ETL to be constructed will be connected to existing 154 kV İkizler ETL belonging to Turkish Electricity Transmission Company (TEİAŞ). TEİAŞ notified its Connection Opinion, Connection Agreement Call Letter, with an official letter dated 03.07.2024 numbered 2547951, and the Connection Agreement between TEİAŞ and Tosyalı was signed on 24.12.2024.

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 21 / 91

3 BASELINE CONDITIONS

3.1 Interview results with Yörük families

There is a list provide information on the realized interview with Yörüks via Table 3. As a summary of the results of the interviews with Yörüks, can be summarized as the following:

One of the primary livelihood sources of the Yörük households is small-scale livestock herding, and they temporarily reside within the Project site with their animals during certain periods of the year. Their stay in this area generally coincides with the winter months, a period when grazing activities do not take place and the animals are kept in shelters and fed with supplementary feed. They leave the area in May and return in December. The time they spend here varies between approximately 5 to 6 months. In other words, no grazing is performed by Yörüks in the Project area, which is only used for wintering. Although grazing is not practiced during the winter months when temporary accommodation takes place, access to nearby officially designated grazing areas also relies on the use of main roads and connecting routes. The planned Project means that this activity can no longer be carried out in the area on their behalf.

Another source of livelihood for the Yörük households is waste collection, primarily of scrap materials. In this context, being located near an Organized Industrial Zone (OIZ) and main transportation networks facilitates the continuation of this activity. All informally stored waste materials within the Project site will be removed by the Project Owner. This means that the Yörük households will no longer be able to collect waste from this area, nor will they be permitted to bring in waste from outside.

Details of these assessments can be given in line with the following meeting notes:

During a face-to-face field visit conducted on 14 November 2024, it was reported that the Yörüks had been using the pasturelands around the project area for at least five to nine years. They explained that during the summer months, they typically relocated from this temporary settlement to alternative grazing areas. It was further noted that approximately 500 animals were owned by local communities residing in the vicinity of the project site.

In a subsequent field mission on 28 January 2025, further engagement was carried out with Yörük families living nearby. These discussions revealed a range of concerns and details about their living conditions and sources of livelihood.

The first family stated that three people live in the household, including two shepherds who are also relatives. It was mentioned that one of them works as a scrap dealer, while other family members reside in Toprakkale. Although it was estimated that around ten people make up the extended family, no precise number was given. Four students from the household were reported to be attending school, and an elderly woman was said to be bedridden. Their main livelihood was described as animal husbandry, with approximately 150 animals—comprising adult males, females, and lambs. The interviewees noted that there were two barns and separate tents for feed storage in their area, but they expressed concern about transporting animals in the current season.

The four mentioned students do not live in the tents within the Project site; they permanently reside in Toprakkale with their extended family members and attend school there. Similarly, the elderly woman reported to be bedridden also resides in Toprakkale and is cared for by her family members. Therefore, neither the students nor the elderly woman is directly affected by displacement or livelihood impacts related to the Project site. Although these individuals have the potential to be indirectly affected by household income loss, the households primarily expressed requests for support related to relocation and provision of materials, rather than

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 22 / 91

compensation for income loss. Therefore, the extent of this indirect impact could not be determined in a measurable way.

The second family interviewed reported that five individuals lived in the household, including a man, his wife, parents, and a child (3 years old). They explained that they stay in the area for five months a year, and during the rest of the time, they move to Toprakkale's plains ("Ova") with their animals. This family, like the other one, has a permanent residence near the district and stays in those houses when they are not living in the tents. It was shared that the animals were fed with a mix of crushed cotton seeds and barley known as "çiğit." The household's only source of income was said to be livestock farming. According to the interview, the family had 197 female animals, 124 males, and 60 young animals, all kept in separate tents. Transporting feed, estimated at 10–15 tons, was mentioned as significant challenge. They also indicated that they sold 120 to 130 young animals annually, with last year's price ranging between 7,000 and 8,000 TRY per animal.

The third family was stated that the animals had recently given birth and that moving them too early could negatively affect their adaptation. The interviewee noted that within one to one and a half months, the newborns would be strong enough to handle the relocation. The household was described as consisting of four people: one man and three women, including a 14-year-old girl who was of school age but not attending school. The man reportedly lived with two wives, and their daughter. They declared that they owned 300 adult and 100 young animals, relying solely on animal husbandry for income. It was also noted that they typically leave the area in April and return in December, grazing their animals in places such as Osmaniye and Toprakkale during that period. Besides the dates mentioned here, they also have another residence. It has been indicated that the house is in Toprakkale, but no exact location has been specified. Their camp consisted of four tents: three for barns and one for accommodation.

On the same day, representatives from the Tosyalı SPP project and the Osmaniye Organized Industrial Zone (OOSB) Directorate reported that Yörük families were temporarily residing in and around the project area. It was stated that a second field visit had been conducted specifically to engage with these families and collect their feedback regarding the ongoing process. During the visit, the President of OOSB joined the team, and the concerns of the Yörük families were heard directly. According to the project representatives, the families requested that their tents be relocated and properly re-established at a new site. In response, OOSB reportedly assured them that support would be provided in terms of relocation logistics, tent installation, and the necessary materials and labor. The president of the OOSB has maintained regular communication with the affected Yörük families during the consultation process. While the OOSB has expressed willingness to provide support if needed, all relocation activities, grievance management, and technical assistance have been, and will continue to be, carried out under the sole responsibility of Tosyalı..

Additionally, officials observed that three Yörük families living in the area were all engaged in animal husbandry. Environmental concerns were also mentioned during the visit, as various types of waste—including plastic, paper, cotton remnants, and household trash—had been dumped indiscriminately in the area. The source of the waste was reported as unknown, but it was suspected to have been discarded when the Yörük families temporarily left the site. It was emphasized that this illegal dumping had occurred adjacent to a school³, raising further concerns regarding public health and safety.

³ Sensitive receptor of the Project. Yolbulan-Baştuğ Vocational and Technical high School. Official website: <https://yolbulanbastugmeslis.meb.k12.tr/tema/index.php>.

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 23 / 91

3.2 Other observations

In addition to the interviews above, the following information regarding the Yörüks was obtained during other consultations:

During a face-to-face interview with the Mukhtar of Hürriyet Neighborhood on 27 February 2025, it was reported that Yörüks are an important cultural, ethnic, and religious group in the region. The Yörük Festival, traditionally a key event for the community, was also mentioned, although it has not been held in recent years.

Similarly, during an interview with the Erzin District Directorate of Agriculture and Forestry on 28 February 2025, it was highlighted that Yörük tents are located near the project area and that their daily routines should not be disturbed. Suggestions were made to improve accessibility to pasture roads and provide electricity to protect Yörük tents, ensuring that their livelihoods are not disrupted by the project.

The recommendations provided by the Erzin District Directorate of Agriculture and Forestry will be evaluated by Tosyalı, in coordination with the relevant authorities to assess their technical feasibility. If such measures are deemed feasible, engagement with the Directorate will be initiated to ensure their alignment with the livelihood restoration objectives. However, at the current stage, no formal support has been requested from or implemented by the Directorate, and all livelihood support activities remain within Tosyalı's scope and responsibility.

If requested by the regional directorate and if there is a demand from the Yörük community, electricity may be provided during the operation phase. However, it cannot be supplied during the construction phase, as current office operations rely on generators and similar equipment. Once the project transitions into the operation phase, the conditions will be assessed, and support may be provided accordingly.

The findings from the stakeholder consultations above have provided guidance for the development of the LRP. However, the issues mentioned have not been included within the scope of the LRP. These and similar suggestions may be addressed at a later stage through discussions with the PAPs and in cooperation with other stakeholders.

On 12 August 2025, a meeting was held at the association building in Osmaniye/Toprakkale with the presidents and vice presidents of the Toprakkale Yörük Türkmen Association and the Osmaniye Yörük Türkmen Association. A total of eight participants attended the meeting, including the association leaders, their vice presidents, the ÇINAR team, and the Tosyalı team. When asked about institutions, organizations, or associations that could be consulted regarding the Yörüks, it was stated that the Yörük Türkmen Foundation (YÖKTÜRK) headquarters in Ankara does not have a direct connection with the region, whereas the Turkey Türkiye Yörük Türkmen Federation is more widely recognized locally.

During the meetings held with the Toprakkale Yörük Turkmen Association and the Osmaniye Yörük-Turkmen Association, questions were asked on issues such as the living conditions of Yörüks, the main challenges they face, the impacts of surrounding facilities, the state of cultural activities, relations with associations, and expectations for the future. The association presidents stated that the main problems faced by Yörüks living in the region include the lack of pastures and grazing lands, the non-allocation of forest areas, settlement issues, and the lack of basic infrastructure services such as water and electricity.

It was emphasized that Yörüks, who sustain their livelihoods through traditional livestock breeding, are forced to turn to alternative income sources due to the shrinking of these areas and difficulties in accessing resources. Industrial facilities operating in the region directly affect the living areas of Yörüks, which in turn causes changes in their lifestyle. It was expressed that risks may increase in areas overlapping with projects such as solar power plants; therefore, in

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 24 / 91

such projects, Yörüks should be directly consulted during decision-making processes, and progress should be made without disrupting their existing way of life.

It was noted that Yörüks maintain this lifestyle under challenging conditions, and that improving their opportunities would enhance both their living standards and cultural continuity. It was further indicated that while there is communication with companies and no direct complaints have been received against them, Yörüks maintain relations with associations, follow these institutions on social media, and although there are approximately 156,000 Yörüks in Osmaniye, only 300–400 people continue the traditional lifestyle.

In addition, it was reported that each year in October, after the return from the highlands, a large-scale festival called “Yörük-Turkmen Gatherings” is organized, featuring performances by local artists, troubadours, and folk dance groups, along with the offering of traditional dishes. It was also shared that, alongside livestock breeding, weaving is still practiced by some Yörük groups.

During the meeting the Yörüks’ relationship with ecosystem services was not raised; instead, livestock rearing and grazing practices were discussed.

3.3 Yörüks in line with Intangible Cultural Heritage

The findings related to intangible cultural heritage, detailed in Section 5.9.3.2.3 titled General Evaluation of Intangible Cultural Heritage of the ESIA report, are presented here with a focus on the aspects concerning the Yörüks.

Yörüks are a subgroup of Turks of Oghuz origin who are nomadic, mainly living in the Anatolian mountains and partly in the Balkan Peninsula. Yörüks in the Balkans are spread over a wide area, from the eastern parts of North Macedonia to Bulgaria, Greece and Southern Thrace. Their name is derived from the verb "walk", meaning "yürü or yürümek (to walk)" in Turkish, which in the end caused them to be named as Yörük. Many researchers agree that the word Yörük is derived from the verb Yörümek, meaning to walk in Turkish and that this name is a word that refers to all the nomadic Oghuz Tribes (Turkmens) who came to Anatolia and settled in Anatolia. For example, Faruk Sümer uses the word "Yörük" in almost the same sense as Nomadic Turkmens. However, some researchers used the word "Yürük" instead of "Yörük".⁴ According to some researchers, the name Yörük refers only to those in the West of the Kızılırmak River, while the tribes living in the East of the same river are called Turkmen.⁵

Throughout the historical process, Yörüks were affiliated with the Yörük Sanjak, which was a separate organizational unit of the Ottoman Empire, not a territorial unit like other sanjaks. Yörüks are fond of their independence. Their habitats include vast steppes, mountains, plateaus, and deep grassy valleys. The life of the nomad is based on feeding his animals and himself feeding on them or their products. Loyalty to cities or land does not suit any Yörük. For this reason, they did not want to switch from nomadic life to settled life for many centuries. Yörük/Turkmenism, which is the name of the nomadic or semi-nomadic life and thought of the Turks, derives its origin from the love of the environment, animals and people. Determining the universal values of this tradition and revitalizing it as an intellectual and cultural entity is beneficial for Turkish culture⁶.

During the meeting held on 12 August 2025 in Osmaniye/Toprakkale with the presidents and vice president of the Toprakkale Yörük Türkmen Association and the Osmaniye Yörük Türkmen Association also compiled information on the intangible cultural heritage elements of the Yörüks. The following findings, presented in a question-and-answer format, constitute a summary of this meeting.

⁴ DOĞAN, Said; DOĞAN, Cihangir; Tarihsel Gelişim Sürecinde Yörükler, Sosyoloji Dergisi, 2006

⁵ <https://tr.wikipedia.org/wiki/Yörükler>

⁶ <https://www.muqla.bel.tr/sayfa/loruk-kulturu>

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 25 / 91

Is the area where the Project is located a place where local people gather for festivals, celebrations, or other purposes?

Yörük festivals were held 10–15 years ago. Currently, festivals have been organized in the stadium for the past 15 years.

Are there any known tombs, shrines, or other sacred sites in the vicinity that are visited by the public? If such sites exist, are they near the Project area or affected by the Project?

Süleyman Dede Tomb (Toprakkale, Askeriye Üstü, Karataş Neighborhood).

Are there festivals attended by the local population? If festivals are held, are they organized in provincial/district centers? What types of festivals are these? Do performers such as singers participate? Do people attend to showcase and/or sell products?

Yörük-Türkmen gatherings are held in October, after the return from the highland pastures. Festivals take place in the stadium with performances by singers, local bards, aşık performers, mehter bands, and folk dance groups. Traditional dishes such as kavurma, sıkma, and börek are served. About 60 women participate in food preparation, and some events are sponsored.

Do folkloric practices common in Anatolia—such as bride-seeking rituals, placing the bride on a horse, fasting during Ramadan, collective iftars, men gathering separately at weddings, Hıdırellez, spring festival celebrations, or burying wishes under rose trees—continue? If so, which ones? Are there additional traditional practices specific to your community?

Bride-seeking rituals, fasting, collective iftars (community meals), and festivals continue. Previously, brides would arrive on camels and light the tent fire; now these old customs are only performed during festivals. Currently, flag-raising ceremonies occur, meals are served from Friday, rams are sacrificed, and dishes such as kavurma, pilav, and desserts are prepared and distributed. Weddings begin Friday at noon and end Sunday, lasting three days. When entering the house, the bride's mother-in-law scatters rice.

For how many generations has your community lived in this region?

Yörüks were present before the Republic. Initial settlements date back to 1944. They moved to the Aydın region in 1918 and returned to the Osmaniye area in the 1960s. Turkish Identity cards were issued to Yörüks in 1934.

Do you still practice traditional Yörük rituals, holidays, or celebrations today? (For example, migration onset, highland migration, wedding rituals, etc.)

Festivals continue. The migration fire is lit in April when flowers bloom. Highland stays last until the end of August. Customs such as tying horse tails and wearing colored keyfiyes are maintained.

Are traditional handicrafts (felt, kilim, weaving, copperwork, etc.) still practiced within families?

Chuls (rug-like mats) are made from goat hair.

Do you still maintain the traditional Yörük tent culture (goat-hair tents, obas), or have you transitioned to more modern forms of housing?

Obas exist, but goat-hair tents do not. However, the culture continues.

Are there sacred sites, shrines, or visited places along your highland and migration routes? Are they related to the Project area?

There are no such sites along the migration route, but mountains and forests are considered sacred.

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 26 / 91

Are folk tales, ditties, laments, folk songs, or lullabies still preserved within families?

They exist in some villages and larger families, including areas of Osmaniye Toprakkale such as Aslanpınarı, Sayık, and Tüysüz.

Will the planned Project in the region affect your traditional migration routes or highlands?

It will not.

Could Project activities negatively impact your traditional production methods (livestock raising, handicrafts, migration)?

Our sacred areas are forests and mountains. As long as forests are not damaged, there is no issue. Yörüks do not have grazing rights; no risks or damages are anticipated.

Do you still use handicrafts as a source of income?

Weaving and the production of souvenirs continue. There is a necklace-like souvenir called "Çıtlık."

Do you have any requests to the Project owners regarding the protection of your cultural heritage?

Requests include support for the festival, creation of employment, and ensuring that Yörüks are not disadvantaged.

Are there cultural heritage sites related to your ancestors, such as graves, sacred trees, stones, or fountains?

There are highland pastures and graves, but no other sites.

What are your expectations in case these heritage sites are damaged by external factors?

There are no expected damages.

It should be noted that the findings are directly included to the report. There is no interpretation of cultural heritage expert. Therefore, these information must be confirmed by expert's additional evaluation.

Details will be given about the mentioned topic within the Project-specific Cultural Heritage Management Plan.

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 27 / 91

Table 3. Stakeholder consultations prior to livelihood restoration activities

Name of Stakeholders	Identification of Stakeholders	Impact level	Details of participant			Vulnerability condition	Date	Location
			Age	Gender	Household size			
Yörüks living in vicinity of the project area	PAP	Direct	<i>Redacted pursuant to KVKK</i>	<i>Redacted pursuant to KVKK</i>	<i>Redacted pursuant to KVKK</i>	<i>Redacted pursuant to KVKK</i>	28.01.2025	Project area
Yörüks living in vicinity of the project area	PAP	Direct	<i>Redacted pursuant to KVKK</i>	<i>Redacted pursuant to KVKK</i>	<i>Redacted pursuant to KVKK</i>	<i>Redacted pursuant to KVKK</i>	28.01.2025	Project area
Yörüks living in vicinity of the project area	PAP	Direct	<i>Redacted pursuant to KVKK</i>	<i>Redacted pursuant to KVKK</i>	<i>Redacted pursuant to KVKK</i>	<i>Redacted pursuant to KVKK</i>	28.01.2025	Project area

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 28 / 91

3.4 Evaluation of Yörüks in accordance with PS7 Indigenous People

Criteria required for assessment under PS7:

According to IFC Performance Standard 7 (PS7), for a community to be considered as "indigenous people," it must meet one or more of the following criteria:

- Maintaining their own social, cultural, economic, and political institutions
- Having a strong traditional attachment to a specific geographic area
- Depending on traditional livelihoods (e.g., nomadic pastoralism, traditional agriculture)
- Possessing distinct cultural, linguistic, and social characteristics

They address the specific needs and sensitivities of communities with unique cultural, economic, or social characteristics through other Performance Standards—such as PS1 (Assessment and Management of Environmental and Social Risks and Impacts), PS5 (Land Acquisition and Involuntary Resettlement), or PS8 (Cultural Heritage).

The Constitution of the Republic of Türkiye (see Table 1) does not recognize any ethnic, linguistic, or religious subgroup as having special status distinct from the general citizenship framework. All individuals are considered equal before the law as Turkish citizens. As such, acknowledging a specific group as "indigenous" with differentiated rights could be perceived as contradictory to the principles of equality and the unitary state structure.

Türkiye is not a signatory (see International Requirements) to International Labour Organization Convention No. 169 on Indigenous and Tribal Peoples, which is one of the key international legal instruments defining the rights of indigenous peoples. Türkiye has historically refrained from endorsing international agreements that include terminology such as "indigenous peoples."

As a summary, the main reason for the non-implementation of PS7 in Türkiye is the absence of a legal definition of "indigenous peoples," as well as the perception that such definitions may politically conflict with the country's unitary state structure. Therefore, international financial institutions generally prefer to address sensitivities related to relevant communities through other standards rather than applying PS7 directly in projects.

The lifestyles, livelihoods, and cultural characteristics of the Yörüks have been reviewed in detail with Table 4 in the context of IFC PS7⁷. Based on this assessment, it has been determined that the Yörüks are not considered Indigenous Peoples according to the criteria set out in IFC PS7. In addition, the impact of the project's land acquisition is limited to only three Yörük families and does not affect the entire Yörüks.

⁷ Overview of Performance Standards on Environmental and Social Sustainability. Performance Standard 7. Indigenous Peoples. January 1, 2012. <https://www.ifc.org/content/dam/ifc/doc/2010/2012-ifc-performance-standard-7-en.pdf>.

Table 4: Evaluation of Yörüks in accordance with PS7 Indigenous People

Section	Sub section	Item / Article	Framework	Page	Description related to Yörüks
Introduction	-	1	Performance Standard 7 recognizes that Indigenous Peoples, as social groups with identities that are distinct from mainstream groups in national societies, are often among the most marginalized and vulnerable segments of the population.	1	Yörüks do not differ in identity from mainstream groups. They do not experience marginalization. The only situation in which they could be vulnerable is their use of temporary living spaces. However, the Yörüks in this area, as well as other nearby Yörüks, also have regular homes apart from the tents they use for living.
Introduction	-	1	In many cases, their economic, social, and legal status limits their capacity to defend their rights to, and interests in, lands and natural and cultural resources, and may restrict their ability to participate in and benefit from development.	1	Economically, they do not face any restrictions. If they wish, they can work in insured jobs. They are not subject to any restrictions. The Yörük Industrialists and Businesspeople Association ⁸ (YÖRSİAD) operates in Türkiye ⁹ . Socially, they are not subject to any restrictions ¹⁰ in any area. Like every Turkish citizen, they have official identity documents, and their rights are protected by the Constitution ¹¹ . They have equal rights under the law, just like everyone else. There are no restrictions that prevent them from accessing any natural resources. Culturally, their right to establish associations is safeguarded by law to maintain their sense of belonging. Development plans (the most recent being the 12th Development Plan ¹²) include all citizens of Türkiye, with no separate reference to identity, and no group is excluded from these plans.
Introduction	-	1	Peoples are particularly vulnerable if their lands and resources are transformed, encroached upon, or significantly degraded.	1	The Yörük families do not have formal ownership of the land within the Project area, nor is there any traditional ownership or customary use of this land. They are residing informally. Apart from this, the Yörüks do not have direct ownership of land with defined boundaries. Like every citizen, they live in homes. They may have rented or purchased these homes. In accordance with the results of the realized interview, they have residence in district center of Toprakkale. So, there are no restrictions regarding this. This situation applies not only to the Yörüks here but to all Yörüks ¹³¹⁴¹⁵ .
Introduction	-	1	Their languages, cultures, religions, spiritual beliefs, and institutions may also come under threat.	1	The Yörüks do not use any language other than Turkish as their native language ¹⁶ . Yörüks are already connected to the Turkmen culture, which directly involves speaking Turkish. Yörüks do not have their own separate institutions ¹⁷ ; they are governed within the same administrative divisions as other citizens ¹⁸ . They benefit from the services provided by the central and provincial organizations of ministries.
Introduction	-	1	This vulnerability may include loss of identity, culture, and natural resource-based livelihoods, as well as exposure to impoverishment and diseases.	1	There is no situation that would hinder the identity or culture of the Yörüks. The area that the Yörüks currently use and the area to which they will be relocated differ by no more than 100 meters. Therefore, their nomadic activities are affected at a very minimal level, as the new area just 100 meters away will allow them to continue their traditional lifestyle. The Project does not pose any obstacle to their access to natural resources, as the area in question is not considered a natural resource. The in-kind support they requested to address livelihood losses has been provided. Engagement with them will continue, and their requests and grievances will be heard. No concerns regarding impoverishment have been raised; their requests have remained limited to in-kind support. Relocating from the area they currently occupy will actually be beneficial for their health, as living in an area where waste materials are accumulated already presents a significant health risk.
Scope of Application	-	4	There is no universally accepted definition of "Indigenous Peoples." Indigenous Peoples may be referred to in different countries by such terms as "Indigenous ethnic minorities,"	1	In Türkiye, there is no group defined by any of these terms ¹⁹²⁰ .

⁸ A non-governmental organization based in Antalya. Yörük Industrialists and Businesspeople Association. Official website: <https://www.yorsiad.org.tr/tr>.

⁹ Association Law No 5253. The United Nations High Commissioner for Refugees (UNHCR) Refworld. Global Law&Policy Database. Source: <https://www.refworld.org/legal/legislation/natlegbod/2004/en/74609>.

¹⁰ Republic of Türkiye. Ministry of Foreign Affairs. International Covenant on Civil and Political Rights. Source: <https://www.mfa.gov.tr/international-covenant-on-civil-and-political-rights.en.mfa>

¹¹ The Constitutional Court of the Republic of Türkiye. Turkish Constitution. https://www.anayasa.gov.tr/media/7258/anayasa_eng.pdf.

¹² Presidency of the Republic of Türkiye. Presidency of Strategy and Budget. Twelfth Development Plan (2024-2028). Source: https://www.sbb.gov.tr/wp-content/uploads/2025/03/Twelfth-Development-Plan_2024-2028.pdf.

¹³ Muğla Municipality. Yörük Culture. The concept of Yörük and Yörüklük. Source: <https://www.muqla.bel.tr/sayfa/yoruk-kulturu>.

¹⁴ Yörüks in the Ottoman Empire. Tax Policies Applied in the Transition of the Yörüks from Nomadism to Settled Life in the Ottoman Empire and Their Social Consequences. Assist. Prof. Dr. Ali Rıza GÖKBUNAR – Celal Bayar University, School of Applied Sciences, Manisa. Source: <https://www.tarihportali.org/konular/osmanli-devletinde-yorukler.6500/>.

¹⁵ Republic of Turkey Ministry of Culture and Tourism. 9th International Turkish Folk Culture Congress. Music, Dance, Entertainment. Efforts to Preserve Intangible Cultural Heritage. Changes Occurring in Yörük Culture. Prof. Dr. Metin Özkul - Adem Öter. Pages 475-506. Source: <https://www.kulturportali.gov.tr/mrepo/eKitap/eb-YorukKulturundeMeydana/34/index.html>.

¹⁶ Yörüks. Source: <https://en.wikipedia.org/wiki/Y%C3%B6r%C3%BCks>.

¹⁷ Yörüks. Concepts of Oghuz, Turkmen, and Yörük in Turkish Culture. Dr. Cahit Geleççi. Hacettepe University.ISSN: 1305-5992. Journal of Turkic Studies. Autumn 2004.Issue 1 https://turkoloji.cu.edu.tr/HALKBILIM/cg_yoruk/cg_yoruk.htm. Source: https://turkoloji.cu.edu.tr/HALKBILIM/cg_yoruk/cg_yoruk.htm.

¹⁸ Durukan, Arzu & Gülel, Hasan. (2020). YÖRÜKS' EFFORTS TO PRESERVE THE CULTURE OF THEIR ANCESTORS AND THE CHANGES EXPERIENCED Yörüklerin Atalardan Kalan Kültürü Koruma Çabası ve Yaşanan Değişiklikler. 3. 56-67. Source: https://www.researchgate.net/publication/341046088_YÖRÜKS'_EFFORTS_TO_PRESERVE_THE_CULTURE_OF_THEIR_ANCESTORS_AND_THE_CHANGES_EXPERIENCED_Yoruklerin_Atalardan_Kalan_Kulturu_Koruma_Cabasi_ve_Yasanan_Değişiklikler.

¹⁹ United Nations iLibrary. State of the World's Indigenous Peoples. Source: <https://www.un-ilibrary.org/content/series/25186922>.

²⁰ United Nations Permanent Forum on Indigenous Issues. Who are indigenous peoples?. Source: https://www.un.org/esa/socdev/unpfiil/documents/5session_factsheet1.pdf.

Section	Sub section	Item / Article	Framework	Page	Description related to Yörüks
			"aboriginals," "hill tribes," "minority nationalities," "scheduled tribes," "first nations," or "tribal groups."		
Scope of Application	-	5	In this Performance Standard, the term "Indigenous Peoples" is used in a generic sense to refer to a distinct social and cultural group possessing the following characteristics in varying degrees: Self-identification as members of a distinct indigenous cultural group and recognition of this identity by others;	2	The Yörüks are generally known and recognized by others as a community living mainly in the Mediterranean region of Türkiye. However, the Yörük lifestyle is also shared by individuals who are not Yörüks. So, the distinct lifestyles associated with Yörüks are also shared with other citizens in different regions of Türkiye. For example, in the Mediterranean region, not only Yörüks but also many villagers migrate to highlands (yaylas) during the summer for grazing livestock and return to their villages in the winter ²¹²² . In the Black Sea region, high pastures are similarly used for livestock grazing, and the people there are not Yörüks ²³ . In Central and Eastern Anatolia, settlements called "koms ²⁴ " are established in highlands for both livestock raising and beekeeping, and these people also do not identify themselves as Yörüks. In summary, this nomadic characteristic they possess is not sufficient to define them as Indigenous Peoples, as it is not a unique attribute.
Scope of Application	-	5	Collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories;	2	Neither in the Project area nor in other parts of Türkiye there is a geographically defined area designated for the Yörüks and their ancestors ²⁵²⁶²⁷²⁸ . The Project area is a location they have chosen to use for wintering, and they are in a position to find other similar areas if needed ²⁹ . The Yörüks do not have a direct connection to any natural resource, and there are no natural resources present in the Project area.
Scope of Application	-	5	Customary cultural, economic, social, or political institutions that are separate from those of the mainstream society or culture; or	2	They do not have their own traditional, cultural, economic, social, or political institutions. In Türkiye, civil society organizations generally operate for traditional and cultural identities ³⁰³¹ . None of the Yörük families here are members of these associations ³²³³³⁴³⁵ . They do not have a separate economic institution. For their social needs, they receive services from government ministries, organizations affiliated with central and provincial branches, and municipalities. None of these institutions have a separate unit for the Yörüks. Moreover, the Yörüks have not created an institution for themselves apart from these. Political institutions in Türkiye are political parties, and the Yörüks do not have their own political parties. If they did, they would participate in the same general and local elections as other parties. There is no institution dedicated specifically to the Yörüks within the legislative, executive, or judicial branches, nor have the Yörüks created such an institution for themselves.
Scope of Application	-	5	A distinct language or dialect, often different from the official language or languages of the country or region in which they reside.	2	The Yörüks do not use any language other than Turkish as their native language. Yörüks are already connected to the Turkmen culture, which directly involves speaking Turkish.
Scope of Application	-	6	This Performance Standard applies to communities or groups of Indigenous Peoples who maintain a collective attachment, i.e., whose identity as a group or community is linked, to distinct habitats or ancestral territories and the natural resources therein.	2	The Yörüks do not have a specific or distinct habitat in Türkiye. They mainly reside in the Mediterranean region. Apart from this, they also live in cities in the Aegean Region (Muğla, İzmir, Manisa, Balıkesir), Marmara Region (Bursa, Kocaeli, Bilecik), Central Anatolia Region (Eskişehir and Konya), Eastern Anatolia Region (Kahramanmaraş), and Southeastern Anatolia Region (Şanlıurfa). In these areas, they have established associations under the umbrella of the "Yörük Türkmen Union" (Yörük Türkmen Foundation ³⁶) to express their identity. The Yörüks are known to be a significant branch of the Oghuz Turks ³⁷ . Based on this, the definition of "distinct habitats" becomes invalid. As for "ancestral lands," the Yörüks

²¹ The Nomadic Movements in Akseki Town. The Journal of International Social Research. Volume 3 / 10 Winter 2010. Halil Hadimli-Zerrin Karakuzulu-Salih Birinci. Source: <https://www.sosyalarastirmalar.com/articles/the-nomadic-movements-in-akseki-town.pdf>.

²² Alptekin, Mehmet. (2023). Silifke Türkülerinde Yaylalara Göç. Source: https://www.researchgate.net/publication/375747395_Silifke_Turkulerinde_Yaylalara_Goc.

²³ Journal of the Human and Social Science Researches. 2025, Volume 14, Issue 1, Pages 262–282 | Research Article. Şen, E., & Arık, G. (2025). Karadeniz Yayla Göçünün İzlerini Karadenizli Ressamların Eserlerinde Aramak. İnsan ve Toplum Bilimleri Araştırmaları Dergisi, 14(1), 262-282. Source: <https://doi.org/10.15869/itobiad.1605568>.

²⁴ A Study on Kom Settlements in Hınıs. Yrd. Doç.Dr. Saliha Koday. Türk Coğrafya Dergisi. 1999. Source: <https://web.archive.org/web/20161220205425/http://dergipark.ulakbim.gov.tr/tcd/article/view/1074000323/1074000315>.

²⁵ Ceyhan, Ayhan & Unalan, Adnan & Akyol, Ethem. (2020). Yörüklerin Başlıca Ekonomik Faaliyetleri ve Gelecekte Beklentileri Üzerine Bir Saha Çalışması. Source: https://www.researchgate.net/publication/348299614_Yoruklerin_Baslica_Ekonomik_Faaliyetleri_ve_Gelecekte_Beklentileri_Uzerine_Bir_Saha_Calismasi.

²⁶ Aygül, B. (2025). Yörüklerin Yaşam Tarzı. BENGİ Dünya Yörük-Türkmen Araştırmaları Dergisi, 2025(1), 103-121. <https://doi.org/10.58646/bengi.1605445>. Source: <https://dergipark.org.tr/tr/pub/bengi/issue/90553/1605445>.

²⁷ <https://www.trthaber.com/haber/yasam/konargocerlik-kulturunun-bin-yillik-temsilcileri-sarikecili-yorukleri-411621.html>

²⁸ Süleyman Demirel University The Intangible Cultural Heritage of Isparta and Its Surroundings Yörük Culture Süleyman Demirel University Publications / Publication No: 108 ISBN: 978-605-9454-45-2 SDU Publication No: 108. https://w3.sdu.edu.tr/SDU_Files/kitaplar/yoruk-kitabi.pdf.

²⁹ Ozen, Huseyin & Direk, Mithat. (2023). EKOLOJİK VE SÜRDÜRÜLEBİLİR BİR YAŞAM ÖRNEĞİ: YÖRÜK KÜLTÜRÜ. Source: https://www.researchgate.net/publication/372854681_EKOLOJIK_VE_SURDURULEBILIR_BIR_YASAM_ORNEGI_YORUK_KULTURU.

³⁰ Evaluation of Last Period Yoruk Associations in Turkey on the Axis of Leadership. Özkan, M. & Acar, O. K., (2022). "Türkiye'de Son Dönem Yörük Derneklerinin Liderlik Ekseninde Değerlendirilmesi" ODÜSOBİAD 12 (3), 2307-2326 Doi: 10.48146/odusobiad.1100904. <https://dergipark.org.tr/tr/download/article-file/2363826>.

³¹ Kolukirik, Suat & Gün, Elif. (2024). KENT KİMLİĞİNİN OLUŞUMUNDA SİVİL TOPLUM KURULUŞLARININ ROLÜ: ANTALYA'DAKİ YÖRÜK DERNEKLERİ ÜZERİNE BİR ARAŞTIRMA. Çukurova Üniversitesi Sosyal Bilimler Enstitüsü Dergisi. 34. 10.35379/cusosbil.1410832. Source: https://www.researchgate.net/publication/381793167_KENT_KIMLIGININ_OLUSUMUNDA_SIVIL_TOPLUM_KURULUSLARININ_ROLU_ANTALYA'DAKI_YORUK_DERNEKLERI_UZERINE_BIR_ARASTIRMA.

³² Yörük-Türkmen Union of the Turkic World (Türk Dünyası Yörük Türkmen Birliği). Official website: <https://yorukturkmenbirligi.org/>.

³³ Türk Dünyası Yörük Türkmen Birliği. Federations. Source: <https://yorukturkmenbirligi.org/federasyonlar/>.

³⁴ Türk Dünyası Yörük Türkmen Birliği. Associations. <https://yorukturkmenbirligi.org/dernekler/>.

³⁵ Türk Dünyası Yörük Türkmen Birliği. Foundations. <https://yorukturkmenbirligi.org/vakiflar/>.

³⁶ Yörük-Türkmen Union of the Turkic World (Türk Dünyası Yörük Türkmen Birliği). Official website: <https://yorukturkmenbirligi.org/>.

³⁷ Oghuz Turks. Source: https://en.wikipedia.org/wiki/Oghuz_Turks.

Section	Sub section	Item / Article	Framework	Page	Description related to Yörüks
					consider themselves as Türkmen, and their ancestral lands are the steppes between the Amu Darya River and the Caspian Sea in Central Asia, from which they migrated at the end of the 7th century ³⁸ . While they do have a collective attachment to their past, none of the other criteria intersect with this definition.
Scope of Application	-	6	It may also apply to communities or groups that have lost collective attachment to distinct habitats or ancestral territories in the project area, occurring within the concerned group members' lifetime, because of forced severance, conflict, government resettlement programs, dispossession of their lands, natural disasters, or incorporation of such territories into an urban area.	2	As mentioned in the above definitions, no distinct geography or ancestral land, including the project area, can be referred to in Türkiye. None of the situations such as "forced severance, conflict, government resettlement programs, dispossession of lands, natural disasters, or incorporation of such territories into an urban area" have occurred in the project area or for the Yörük people in general. As repeatedly stated, there is no area that can be directly defined as "Yörük land."
Scope of Application	-	7	The client may be required to seek inputs from competent professionals to ascertain whether a particular group is considered as Indigenous Peoples for the purpose of this Performance Standard.	2	A team of cultural heritage experts has worked on this Project, and the findings have been presented in both the ESIA and Cultural Heritage Management Plan reports. However, the Yörüks are not defined as Indigenous People in these reports. Additionally, the social team has conducted interviews with the Yörüks to identify both the current situation characteristics and as part of the LRP. No findings were encountered that align with the above definitions.
Requirements	General / Participation and Consent	11	Affected Communities of Indigenous Peoples may be particularly vulnerable to the loss of, alienation from or exploitation of their land and access to natural and cultural resources.	3	The Yörük families do not have formal ownership of the land within the Project area, nor is there any traditional ownership or customary use of this land. There are no resources in this area. They do not have any cultural resources in the project area. Therefore, there are no issues or restrictions regarding access to such resources.
Requirements	Circumstances Requiring Free, Prior, and Informed Consent / Impacts on Lands and Natural Resources Subject to Traditional Ownership or Under Customary Use	13	Indigenous Peoples are often closely tied to their lands and related natural resources. Frequently, these lands are traditionally owned or under customary use.	3	There is no defined land for the Yörüks. There are no natural resources in the project area. The area they occupy is not traditionally owned by them. The area allocated to Tosyalı has no connection to local traditions (such as pastures, grazing land, etc.).
Requirements	Circumstances Requiring Free, Prior, and Informed Consent / Impacts on Lands and Natural Resources Subject to Traditional Ownership or Under Customary Use	13	While Indigenous Peoples may not possess legal title to these lands as defined by national law, their use of these lands, including seasonal or cyclical use, for their livelihoods, or cultural, ceremonial, and spiritual purposes that define their identity and community, can often be substantiated and documented.	3	It is true that the Yörüks reside in the project area informally. They do not have a livelihood or any other source that defines their identity or community in this area. The area is not used for cultural, ceremonial, or spiritual purposes on a seasonal or periodic basis. They have not made any statement regarding such use. They are present in the project area during winter to shelter animals and collect materials from waste.
Requirements	Circumstances Requiring Free, Prior, and Informed Consent / Relocation of Indigenous Peoples from Lands and Natural Resources Subject to Traditional Ownership or Under Customary Use	15	The client will consider feasible alternative project designs to avoid the relocation of Indigenous Peoples from communally held lands and natural resources subject to traditional ownership or under customary use.	4	There is no land or natural resource in the project area that is based on Yörük traditions of ownership or customary use.
Requirements	Circumstances Requiring Free, Prior, and Informed Consent / Critical Cultural Heritage	16	Where a project may significantly impact on critical cultural heritage that is essential to the identity and/or cultural, ceremonial, or spiritual aspects of Indigenous Peoples lives, priority will be given to the avoidance of such impacts.	5	There are no critical cultural heritage elements in the project area that are essential for the identity, cultural, ceremonial, or spiritual life of the Yörüks.
Requirements	Mitigation and Development Benefits	19	The determination, delivery, and distribution of compensation and other benefit sharing measures to the Affected Communities of Indigenous Peoples will take account of the laws, institutions, and customs of these communities as well as their level of interaction with mainstream society.	5	The Yörüks do not have their own laws or institutions ³⁹ . Since they cannot be considered under the category of Indigenous Peoples, their decisions have been listened to and a LRP framework has been developed based on their requests, by approaching them as disadvantaged groups in the <i>Participation and Consent</i> steps. At this point, no emphasis has been placed on customs or traditions.
Requirements	Private Sector Responsibilities Where Government is Responsible for Managing Indigenous Peoples Issues	21	Where the government has a defined role in the management of Indigenous Peoples issues in relation to the project, the client will collaborate with the responsible government agency, to the extent feasible and permitted by the agency, to achieve outcomes that are consistent with the objectives of this Performance Standard.	6	There is no defined institution for the Yörüks by the state. According to the Constitution ⁴⁰ , there is no institution specifically designated for any group.

³⁸ Turkic Migration. Source: https://en.wikipedia.org/wiki/Turkic_migration.

³⁹ The Manners And Customs About Traditional Folk Law In Gözkaya Village Of Aydın Province. Adnan Menderes University, Journal of Institute of Social Sciences, Vol.:5, No: 2 (pp. 105 - 121). Source: <https://dergipark.org.tr/tr/download/article-file/528138>

⁴⁰ Article 10 (Principle of Equality), Article 42 (Right to Education and Training), and Article 67 (Citizenship and Rights).

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 32 / 91

3.5 Disadvantaged/Vulnerable Individuals or Groups (DVIG)

The term pertains to individuals or groups who are at a higher risk of being negatively impacted by the project's effects and may face more constraints than others in harnessing the benefits of a project. Such individuals or groups are also more prone to exclusion from or limitations in their ability to fully participate in the regular consultation process. Consequently, they may necessitate specific measures and assistance to engage effectively.

This project defines vulnerable groups based on characteristics that might limit their access to project-related information, participation in consultations, and access to announcements. Consequently, non-Turkish-speaking individuals, the elderly, and people with disabilities are identified as vulnerable groups for this project.

The identified vulnerabilities are given in alphabetical order;

- Disabled people
- Earthquake victims
- Elderly people
- Female household heads
- Illiterate adults
- Non-Turkish speaker people
- Refugees, and/or asylum seekers
- Vocational high school students providing access via pedestrian and public transportation
- Yörüks

The Yörüks can be considered a disadvantaged group within the context of the project because several factors make them more vulnerable. Specifically, the presence of groups such as the elderly, disabled individuals, bedridden people, illiterate adults, and women who are household heads on their own within Yörük families creates a greater need for social and economic support and protection. Please refer to Interview results with Yörük families to investigate household profiles of the community.

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 33 / 91

3.6 Proposed Strategy to Incorporate the View of Yörüks

The strategy developed for the Yörüks based on these principles is formulated by the following items;

- The Yörük community is included within the scope of this LRP as one of the disadvantaged groups identified in the project area. No physical or economic resettlement impacts are expected on other groups.
- There is no local language for the Yörük people. Therefore, all information dissemination processes will be conducted in Turkish.
- The Yörük people do not require a culturally adapted approach. For their access and participation, the period when they are in the project area seasonally should be utilized. Therefore, all activities will be completed before they leave the area.
- Face-to-face meetings will be the primary method of information dissemination. Written documents need to be provided; however, there are representatives who are illiterate. Therefore, support will be provided to ensure the understanding of written documents. To maintain transparency, an illiterate representative will be accompanied by a literate household member or a literate representative from other households to assist or guide them.
- The Yörüks in the project area are in agreement on the matter. All representatives are in consensus regarding the provision of relocation support in-kind as part of the LRP. Therefore, there was no need to create separate sessions for different opinion groups to express themselves. As a result, special meetings such as focus groups will not be used during this process.
- The initial information meeting, as well as other meetings, will be held face-to-face at the Project site. All processes will be completed before the Yörük community migrates from the area. If they migrate, communication will be conducted via phone instead of face-to-face meetings. For the Yörük community, phone calls will be the most effective participation method, apart from face-to-face meetings.
- There are no individuals with disabilities among the representatives of the Yörük families in the project area. Although there are individuals with disabilities and bedridden persons in their households, their participation in the information dissemination process is not required. Therefore, special measures for individuals with disabilities will not apply to the Yörük community.
- If the Yörük families request the participation of all household members, the elderly, and those in need of care will be visited in their homes in the Toprakkale district center.
- All activities, including meetings conducted remotely via phone, will be recorded. If video and audio recordings are made, consent will be obtained from individuals in accordance with the Personal Data Protection Law (KVKK)^{41,42}. Otherwise, the records will be documented as field notes by the Social Expert & Community Liaison Officer (CLO).
- The most effective communication method for the Yörüks will currently be those held face-to-face in the area where they are temporarily staying. Efforts will be made to ensure the participation of all members at the same time. In cases where this is not possible, families will be asked to provide the days and times that are suitable for them.
- In all meetings, the steps to apply for the LRP will be explained.
- Feedback will be collected for the support strategy defined within the scope of the LRP. Access to this feedback will be provided to all household representatives. For illiterate

⁴¹ Personal Data Protection Authority. Official website: <https://www.kvkk.gov.tr/>.

⁴² Personal Data Protection Law. <https://www.kvkk.gov.tr/Icerik/6649/Personal-Data-Protection-Law>

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 34 / 91

individuals, the consent form will be provided with the assistance of one of the family members.

- At the meetings, the information previously provided in the posters and announcement texts (see Appendix 5 Documents related to public participation meeting, 28.01.2025) will be left as written copies. For representatives who are illiterate, this information will be presented with explanatory presentations and visually expressed. The entire LRP document will be distributed to them in printed form. For representatives who are illiterate, this information will be presented with explanatory presentations and visually expressed
- The Non-Technical Summary of the Project and Project specific SEP document will also be distributed in print. For representatives who are illiterate, this information will be presented with explanatory presentations and visually expressed.
- One of the copies of the mentioned printed documents also delivered to Mukhtarship offices, and common areas such as coffee houses in nearby settlements.

4 PROJECT IMPACTS AND IDENTIFIED STAKEHOLDERS

4.1 Impact Assessment Methodology

The methodology to be used for the characterization of environmental and social impacts arising from the implementation of the Project has been developed based on the methodologies described in the United Kingdom's (UK) applicable government publications on EIA (Institute of Environmental Management and Assessment-IEEMA, 2011: The State of Environmental Impact Assessment Practice in the UK, Scottish Natural Heritage's (SNH) Handbook on Environmental Impact Assessment (2013) and other available guidance documents on impact assessment (Canter, 1993, Standards Association of Australia, 1999, etc.).

The overall magnitude of an impact or risk is determined by a comprehensive analysis of the criteria which may encompass the following:

- Geographical extent (wide, local or restricted)
- Reversibility (long term reversible/irreversible, medium-term reversible or short-term reversible)
- Duration (long term, medium term or short term)
- Frequency (continuous, recurrent, intermittent or one-off)
- Severity (minimal, moderate, significant)

Criteria for magnitude factors are provided in Table 5.

Table 5. Magnitude Factors and Scales

Factor	Scales		
	High	Medium	Low
Geographical extent	<i>Wide</i>	<i>Local</i>	<i>Restricted</i>
	Beyond the area of influence	Within the area of influence	Within the construction site
Reversibility	<i>Irreversible/Long-term reversible</i>	<i>Medium-term reversible</i>	<i>Short-term reversible</i>
	Reversible after the operation period or irreversible	Reversible within the operation period	Reversible during construction phase or after one year of construction period
Duration	<i>Long-term</i>	<i>Medium-term</i>	<i>Short-term</i>
	After the operation period	Within the operation period	Within construction period
Frequency	<i>Continuous/Recurrent</i>	<i>Intermittent</i>	<i>One-off/rare</i>
	Ongoing or regular occurring; frequent or constant occurrences	Occurring at irregular intervals; sporadic occurrences	Infrequent or just once; a very low likelihood of reoccurrence
Severity	<i>Significant</i>	<i>Moderate</i>	<i>Minimal</i>
	<i>Significant</i> potential change/damage; limited or no mitigation measures	Moderate potential change/damage; and/or costly or ineffective mitigation measures	Minimal potential change/damage; effective and feasible mitigation measures

General criteria to be taken into consideration when determining the sensitivity of the receptor and the overall magnitude are provided in Table 6, whereas specific assessments and methodological variations (if any) for each environmental and/or social component were presented in the ESIA Report.

Table 6. General Criteria for Identification of Receptor Sensitivity and Impact Magnitude Levels

Level	Receptor Sensitivity	Impact magnitude	
		Adverse	Beneficial
High	Highly important (national and international scale of importance), high rarity, potential for substitution very limited	Loss of resource and/or quality and integrity of resources; severe damage to key characteristics, features or elements.	Large scale or major improvement of resource quality; extensive restoration or enhancement; major improvement of attribute quality.
Medium	Moderately important (regional scale of importance) and moderate rarity, potential for substitution limited	Loss of resource, but not adversely affecting the integrity; partial loss of/damage to key characteristics, features and elements	Benefit to, or addition of, key characteristics, features or elements; improvement of attribute quality.
Low	Minor importance (local scale of importance), not rare	Some measurable change in attributes, quality or vulnerability; minor loss of, or alteration to, one (maybe more) key characteristics, features or elements	Minor benefit to, or addition of, one (maybe more) key characteristics, features or elements; some beneficial impact on attribute or a reduced risk of negative impact occurring.
Negligible	No or very low importance and rarity	No or very minor loss or detrimental alteration to one or more characteristics, features or elements	No or very minor benefit to or positive addition of one or more characteristics, features or elements

Following the identification of receptor sensitivity and overall magnitude of an impact on that specific receptor, the significance of the impact was determined by using a standard matrix style approach, which consists of a 4x4 matrix. The matrix and general descriptions of each significance level identified in the matrix are provided in Table 7.

Table 7. Impact Significance Matrix

		Receptor Sensitivity			
		High	Medium	Low	Negligible
Overall Magnitude	High	Major	Major	Moderate	Minor
	Medium	Major	Moderate	Minor	Negligible
	Low	Moderate	Minor	Minor	Negligible
	Negligible	Minor	Negligible	Negligible	Negligible
	Major		Impacts are considered to be very important and are likely to be material in decision-making, which would be associated with sites or features of international, national or regional importance as well as local importance if the site or feature is subject to a major change. Mitigation measures are imperative to reduce the significance to lower levels before proceeding with the Project.		
Moderate		Impacts are not likely to be key decision-making factors. The cumulative impacts of such factors may influence the decision-making if they lead to an increase in the overall adverse impact on a particular receptor. If possible, impact significance is to be reduced to lower levels by taking mitigation measures; otherwise, acceptance of associated risks is required for proceeding with the Project.			

		Receptor Sensitivity			
Overall Magnitude		High	Medium	Low	Negligible
	High	Major	Major	Moderate	Minor
	Medium	Major	Moderate	Minor	Negligible
	Low	Moderate	Minor	Minor	Negligible
	Negligible	Minor	Negligible	Negligible	Negligible
Minor	Impacts may be raised as local factors, which are unlikely to be critical in the decision-making process, but important in enhancing the subsequent design of the Project. Assurance of compliance with standards and safety criteria is sufficient to proceed.				
Negligible	No impact or impacts are beneath the level of perception so that they are acceptable with normal operating procedures.				

Source: Adapted from IEMA, 2011; UK HA 205/08 Volume 11, Section 2; Canter, L., 1993; and other impact assessment methodology guidance/handbooks.

4.2 Impact Assessment

The significant impact resulting from the Project's land acquisition activities is the physical and economic displacement of the Yörük communities within the project site. The anticipated adverse social impact can cause relocation of temporary settlements pattern, and it will be linked to livelihood activities of them.

The vicinity of project site is home to seasonal tents, known as "Yörük tents," which are erected at particular times of the year by herders. They leave the area in May and return in December. The time they spend here varies between approximately 5 to 6 months. These Yörük communities, following their traditional lifestyles, come to the area to engage mostly in livestock farming for their livelihood.

Although the area where the SPP will be established within the scope of the Project has been officially allocated to Tosyalı, vicinity of the Project area is informally utilized by Yörüks to engage livelihood activities based on small cattle farming. These conditions need to be evaluated under the aspect of relocation of temporary settlement conditions and/or livelihood impact.

The assessment of anticipated impacts has been provided phase-by-phase with Table 11.

4.2.1 Pre-construction (Prior to land entry/land clearance)

The potential impact of the physical and economic resettlement of Yörük families prior to land entry is significant, with high sensitivity due to the impact on their livelihoods, primarily based on animal husbandry. The relocation of livestock, especially young animals, presents challenges, as families are concerned about animal health and protection during transportation.

4.2.2 Land preparation and construction

The impact during this phase is less severe compared to the pre-construction phase, as the Yörük families' concerns are primarily related to temporary disruptions in their activities rather than permanent displacements.

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 38 / 91

The potential impact during the land preparation and construction phase is moderate, with local significance. The effects are short-term and reversible, occurring continuously and recurrently throughout the construction period. The main concern during this phase is the disruption to the Yörük families' livelihoods, primarily related to small cattle farming.

4.2.3 Operation

While the impact during this phase is moderate, it is manageable with the proper engagement and support systems in place, ensuring minimal disruption to the Yörük families' way of life.

The potential impact during the operation phase is moderate, with local significance. The effects are medium-term and reversible, occurring intermittently over the course of the operation. During this phase, the Yörük families' livelihoods may be impacted by changes in the areas of small cattle barns, tents and other operational activities.

4.2.4 Decommissioning

The impact during this phase is low due to the limited nature of the disruption and the short-term duration of the effects, which can be effectively managed with the proposed mitigation measures.

The potential impact during the decommissioning phase is minimal, with restricted significance. The effects are short-term and reversible, occurring as a one-off or rare event. During this phase, the Yörük families are likely to experience minimal disruption, as their primary concern is related to the restoration of grazing lands and potential relocation, if necessary.

4.3 Cumulative Impact Assessment

The good Cumulative Impact Assessment (CIA) practice suggests that the CIA studies are conducted with a focus on the environmentally or socially important natural resources, ecosystems or human values, which are in this report referred to as Valued Environmental and Social Components (VESC) and may include the following:

- Physical features,
- Social conditions or
- Cultural aspects.

In consideration of the findings of the baseline and impact assessment studies conducted for the Project, valued environmental and social components to be considered in the CIA have been selected as presented in Table 8.

Table 8. Valued Environmental and Social Components to be considered in CIA

Environmental/Social Subject	Valued Environmental/Social Components	Specific VESCs
Biodiversity and Natural Resources	Key Biodiversity Areas	-
	Species that meet Key Biodiversity Area criteria	-
	Regional endemic and Critically Endangered (CR) species according to IUCN criteria	-
	Groundwater Resources	Burnaz Spring Group Groundwater Reserve and Protection Area
Land Use	Pasturelands	Nearby pasturelands

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 39 / 91

Environmental/Social Subject	Valued Environmental/Social Components	Specific VESCs
Air Emissions and Noise	Air quality and noise levels in sensitive receptors	Yörük Tents Yeşiltepe Village High School Osmaniye OIZ Büyüktüysüz Village
Cultural Heritage	Registered Archaeological sites	Issus Ancient Aqueduct Issus Ancient City
Social and Economic Environment	Land and assets	Project area is allocated to Tosyalı Yörük tents, and other SPP areas within the Project Aol
	Economy	Labor influx in low rate

The distances of Tosyalı Osmaniye SPP Project to other facilities are presented in Table 9.

Table 9. Other Facilities and Their Air Distances to the Project Area

Facilities	District / Province	Air Distance to Tosyalı Osmaniye SPP
Osmaniye OIZ	Toprakkale / Osmaniye	350 m
Erzin-2 SPP	Erzin / Hatay	1,090 m
Erzin-1 SPP	Erzin / Hatay	1,970 m

The future acts anticipated in the Aol of the Project area provided in Table 10.

Table 10. Future Acts in Aol of the Project

Future Acts	Project	Description
Certain	Housing	Individual, not in the Form of Mass Housing
Reasonably Foreseeable	Business Entity	Small-Scale, with limited Environmental Impacts
	Other SPP Projects	Small to Medium-Scale with limited Environmental Impacts within Cebelibereket Erzin Energy Specialized Industrial Zone

The potential impact of the physical and economic resettlement of Yörük families prior to land entry is significant, with high sensitivity due to the impact on their livelihoods, primarily based on animal husbandry. The relocation of livestock, especially young animals, presents challenges, as families are concerned about animal health and protection during transportation.

In the household survey, which is one of the studies examining the socio-economic impacts of the Project, the opinions and suggestions of the local community were gathered. Findings regarding the project's capacity to create employment are very rare. No findings have been encountered regarding an influx of labor associated with it. In summary, there was no expectation that the project would contribute to the regional economy.

Although a contribution to regional employment has not been explicitly stated, the project's commencement may foster a positive outlook due to its contribution to the local economy.

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 40 / 91

Local employment opportunities will be included as part of the project, and priority will be given to the Yörük community during this process, if they express interest.

The Yörüks have already been informed about the relocation area, and their consent has been obtained. Although the designated area falls within Tosyalı's allocated zone, additional consultations will be carried out with the school principal and the OOSB management due to the sensitivity of stakeholder relations. On the other hand, none of the specified areas will intersect with the Yörüks' relocation area, as the land will be Tosyalı's allocated zone. Tosyalı commits to keeping this land available for the Yörüks' accommodation in a suitable manner, unless they themselves choose otherwise.

4.4 Impact Significance and Mitigation Measures

Pre-construction (Prior to Land Entry/Land Clearance)

In this phase, to mitigate the potential impacts on Yörük families, relocation support will be provided, including assistance with transport, temporary shelter, and support for relocating livestock. Effective engagement with the Yörük communities will take place through early consultations, ensuring that their concerns are properly addressed. A functional grievance mechanism will also be implemented to address any issues that arise. Despite these efforts, the residual impact significance is expected to remain moderate.

Land Preparation and Construction

During the construction phase, ongoing communication with the Yörük communities will be crucial to keep them informed of any construction activities. The grievance mechanism will remain active, accessible, and open to all for stakeholders, including Yörük families, to communicate their requests during this period and in the future. If Yörük families submit livelihood-related requests through the grievance mechanism, the application will be reviewed by Tosyalı and, if deemed appropriate, will be implemented. Even if the request is not accepted, the individual(s) who submitted it will receive a written and/or verbal notification regarding the outcome. The grievance mechanism will be closely monitored to address any emerging concerns. With these mitigation measures in place, the residual impact significance is expected to be minor.

This period will coincide with the near completion of other facilities in the surrounding area. Recognizing the potential for cumulative impacts, Tosyalı will assess how nearby projects may affect the relocated Yörük families in the medium to long term—particularly in relation to land availability and possible future displacement.

Tosyalı commits to monitoring the development trajectory of the surrounding industrial zone and, if necessary, engaging with local authorities and neighboring developers to ensure that no further involuntary resettlement will occur. If future industrial expansion creates risks of secondary displacement, alternative relocation options will be identified in consultation with the affected families. The review of strategies applied by other developers to Yörük households will inform Tosyalı's stakeholder engagement and mitigation framework.

Operation

In the operational phase, continued engagement with Yörük families will ensure that their concerns are addressed, and disruptions are minimized. The grievance mechanism will remain operational to resolve any operational issues. As a result, the residual impact significance during this phase is expected to be minor.

This period is likely to coincide with the expansion activities within the Organized Industrial Zone; however, there is no definite timeline for this. The expansion of industrial areas in the region will further exacerbate the difficulties faced by the nomadic Yörüks in finding suitable accommodation areas. However, in line with the measures applied for the three Yörük families

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 41 / 91

covered by the LRP, they have been offered the opportunity to relocate to an area allocated to Tosyalı. Tosyalı commits to keeping this land available for the Yörüks' accommodation in a suitable manner, unless they themselves choose otherwise. In this regard, communication will be established with other facilities in the region to develop joint solutions. In this sense, Tosyalı will not bear sole responsibility for this issue.

Decommissioning

During decommissioning, final consultations will be held with the Yörük communities to address any remaining concerns, and relocation assistance will be provided if needed. Any grazing lands that were affected will be restored to allow families to resume their livelihood activities. With these efforts, the residual impact significance is expected to be minor.

Table 11. Impact Significance and Mitigation Measures

Potential Impact / Risk	Project Phases	Impact Magnitude						Sensitivity / Value of Resource/ Receptor	Impact Significance (prior to mitigation)	Proposed Mitigation Measures	Residual Impact Significance
		Extent	Reversibility	Duration	Frequency	Severity	Overall Magnitude				
Physical and economic resettlement of Yörük families	Pre-construction (Prior to land entry/land clearance)	Restricted	Short-term reversible	Short-term	Continuous/ Recurrent	Significant	Major	High	Major	<ul style="list-style-type: none"> Assistance with transport, temporary shelter, and support (if requested) during relocation. These support measures can be defined as giving priority to the Yörüks during the local employment period, if they express such a request. For initiatives that would require an additional budget, their views and suggestions will be taken into consideration. Technical support will be requested from veterinarians and agricultural engineers on topics such as animal health and feed health during the relocation process. Conduct early, culturally appropriate consultations with Yörük communities to understand their concerns and ensure their participation in the process. Establish an accessible and effective grievance mechanism for the Yörük families to raise issues and receive timely solutions, particularly concerning livestock and temporary accommodations. Since the area to which they will be relocated is allocated to Tosyalı, no disruptive elements are expected due to the implementation of another project in this area. Nevertheless, it must be ensured that no burden, whether in-kind or financial, is placed on the Yörüks during the relocation process. In other words, they must be prevented from falling into a situation that requires a disturbance allowance. If a disturbance allowance is required, they will be able to reach out through the stakeholder participation. Feedback that may be communicated in the form of requests, suggestions, or demands will be open to evaluation. A participatory environment will be established to enable other facilities to share their experiences related to the Yörüks. During this period, a meeting will be organized to obtain information about the measures implemented by nearby SPPs regarding the Yörüks (if any). Officials from the OOSB will also attend the meetings. The meetings will facilitate the transfer of experiences from previous projects. The meeting will be held prior to LRP implementation, with the participation of personnel at the project management level. A series of meetings with industrial zone management and other nearby projects will be conducted during the implementations. 	Moderate
Physical and economic resettlement of Yörük families	Land preparation and construction	Local	Short-term reversible	Short-term	Continuous/ Recurrent	Moderate	Medium	Medium	Moderate	<ul style="list-style-type: none"> They will be allowed to remain in the allocated area for as long as they wish. Necessary protective measures will be implemented to enable them to continue their livestock activities. Their daily lives will be ensured during the periods they stay near the site. Continued communication and consultation with Yörük communities regarding construction activities will be ensured. The effectiveness of grievance mechanism will be monitored and adjusted. If they experience any difficulties during this period, the disturbance allowance will be activated. Their views and suggestions regarding the support to be provided will be collected. Tosyalı will adopt a conciliatory approach at the time when the nature/amount of the disturbance allowance is determined. The PAP will be informed that they are entitled to a disturbance payment. The PAP will be offered both options — disturbance payment or 	Minor

Potential Impact / Risk	Project Phases	Impact Magnitude						Sensitivity / Value of Resource/ Receptor	Impact Significance (prior to mitigation)	Proposed Mitigation Measures	Residual Impact Significance
		Extent	Reversibility	Duration	Frequency	Severity	Overall Magnitude				
										<p>employment opportunity — and action will be taken based on their preference.</p> <ul style="list-style-type: none"> • However, if there is a contrary request, consultations will be held regarding cash payments. • During this period, a regular series of meetings will be established with the participation of project managers from nearby facilities, primarily including the OOSB management. • The first meeting will be held immediately after the contractor's entry to the site. This will ensure interaction between the contractor and neighboring investment areas. The participants will include Tosyalı, the contractor, OOSB management, and the project managers of other investment areas • The second meeting will be held at the end of the first year of construction. The participants will include Tosyalı, the contractor, OOSB management, and the project managers of other investment areas • The final meeting will be held in the quarter immediately preceding the start of the operational phase, with the same way. 	
Physical and economic resettlement of Yörük families	Operation	Local	Medium-term reversible	Medium-term	Intermittent	Moderate	Medium	Medium	Moderate	<ul style="list-style-type: none"> • Ongoing engagement with Yörük communities to ensure minimal impact during the operational phase • Continuation of grievance mechanism for addressing operational issues. • In line with the measures applied for the three Yörük families covered by the LRP, they have been offered the opportunity to relocate to an area allocated to Tosyalı. • Tosyalı commits to keeping this land available for the Yörüks' accommodation in a suitable manner, unless they themselves choose otherwise. • It is necessary to remain open to collective efforts with other facilities and the Organized Industrial Zone to address the accommodation issues of the Yörüks. 	Minor
Physical and economic resettlement of Yörük families	Decommissioning	Restricted	Short-term reversible	Short-term	One-off/rare	Minimal	Low	Low	Minor	<ul style="list-style-type: none"> • Even after a suitable location has been agreed upon and voluntary relocation has taken place, if Yörük families submit additional requests, demands, or suggestions, the application will be reviewed by Tosyalı and, if deemed appropriate, will be implemented. Even if the request is not accepted, the individual who submitted it will receive a written and/or verbal notification regarding the outcome. 	Minor

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 44 / 91

5 PRINCIPLES AND APPROACH FOR LRP

The basic principles of livelihood restoration aim to preserve and, if possible, improve the living standards of individuals who have lost their livelihoods. In line with these principles, the following strategies have been adopted:

- *Restore or Improve:* The livelihood levels of affected individuals need to be maintained or improved to their current state. In this regard, the goal is to make existing activities more efficient and create new sources of income.
- *Participatory Approach:* The active participation of community members in the process will be ensured, and the proposed solutions for livelihood restoration will be shaped according to the views of the local people.
- *Voluntariness and Information:* The entire resettlement and restoration process will be based on voluntariness, and communities will be provided with sufficient information about their rights.
- *Inclusivity:* The needs of women, children, the elderly, and other vulnerable groups will be taken into consideration, and special measures will be implemented for these groups.

The traditional lifestyles of the local people will be respected, and the livelihood restoration processes will be designed in accordance with the cultural characteristics of the Yörük communities. This will ensure not only economic but also social and cultural sustainability.

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 45 / 91

6 PRELIMINARY IMPLEMENTATIONS

Based on the results of all the work carried out under Methodology, the first step of the LRP for the Yörüks is to provide support for their relocation from the field.

This relocation support will be implemented in two steps: The first step involves identifying alternative areas for relocation, while the second step is to provide the necessary equipment for the relocation.

The second stage has been completed. The relevant materials have been consulted with the Yörük families, and the quantities and types were decided.

Production orders have been initiated. An amount of 450,000 Turkish Lira has been spent on the materials, which have been delivered to the Yörük families (see Appendix 6 Documents related to livelihood restoration for Yörük families).

The first step in selecting the new location has not yet been finalized, because during the field visits made after the consultation meeting (see Livelihood Restoration Plan Implementation Study), one of the areas (Alternative Re-Location Area-3) the Yörüks consider suitable for relocation is a pasture area. There is no permit for formal use of this area.

Another area (Alternative Re-Location Area-2) is a field classified as agricultural land, which is owned by a quarry/mining company and would require a legal permit process. Even if the permit process is completed, no analysis has been made regarding the suitability of this area in terms of E&S impact. Another area (Alternative Re-Location Area-1) (see Appendix 7 Area recommended by Project Owner) is an idle plot very close to the Yörük families' current location. The cleaning process for this area has begun and is largely complete (see Appendix 7 Area recommended by Project Owner).

However, the Yörük families are undecided about relocating to this area. The main reason for this indecision is that they will soon leave the area for their planned migration to the plateau in April. They are uncertain about dealing with the relocation process right before their migration. Another issue is that the area will soon be used for SPP purposes. As stated under Interview results with Yörük families, the area is losing its appeal for them. Therefore, the area proposed by the Project Owner will no longer be a preferred option for them. The areas they prefer are not legally suitable.

As a result of the consultations held with the Yörüks, the agreed relocation area has been designated as the "Alternative Re-Location Area-1". The tent relocation process is scheduled to begin in the 20th week of 2025 (approximately May 12). Minor changes to these dates may occur depending on local weather conditions.

The alternative re-location areas described are illustrated via Figure 1. Alternative Re-Location Area-1, Area-2, and Area-3 can be examined on Figure 1.

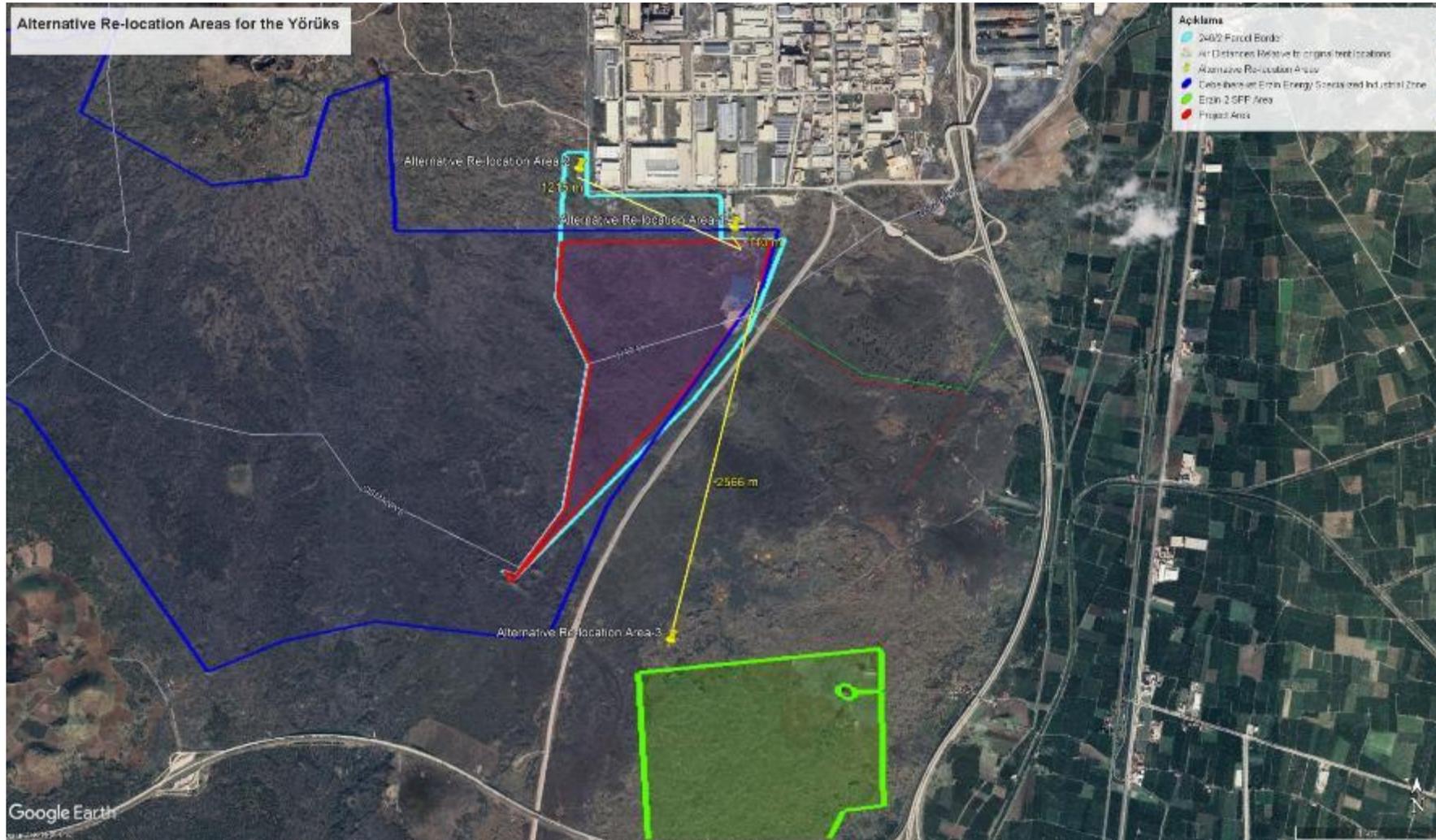


Figure 1. Alternative Re-Location Areas

7 ENTITLEMENT AND ELIGIBILITY CRITERIA

7.1 Cut-off date

In accordance with the WB/IFC requirements, if no cutoff date is envisaged in local legislation or if eminent domain procedures are not used, a project-specific cutoff disclosure process must be established. For this project, the cutoff date has been determined with the announcement made during the meeting on January 28, 2025. Individuals arriving in the area after this date will be excluded from the Entitlement Matrix scope.

7.2 Affected individuals

GM and SEP will be used as tools for Yörük families to submit their requests, track their suggestions.

Three Yörük families live in this area. The total number of people in these households is approximately 12. Some members of these households live at their permanent residences in Toprakkale, without ever using this accommodation area.

The vast majority of the population consists of women. There are also children under school age in the population structure along with individuals in the advanced age group.

7.3 Entitlement Matrix

The support activities determined according to the eligibility criteria have been drafted. The activities outlined here will be revised through consultations with the Yörük families subject to the LRP (please refer to Table 12). The details of these programs have also been provided separately with Table 11, and Table 13.

Table 12. Entitlement Matrix

Affected Person	Assistance Type	In-kind / Cash supports & Disturbance Allowance
Small Livestock Yörük Farmers	Provision of relocation support	<p>Assistance with transport, temporary shelter, and support, especially for moving livestock and accommodating young animals during relocation.</p> <p>The consultation processes regarding site selection have been completed, and the designated area has been prepared by Tosyalı following an agreement with the Yörük families.</p> <p>The opinion of OOSB has also been obtained regarding the alternative areas.</p> <p>After the relocation and the construction of tent structures (including animal shelters), follow-up consultations will be held with the Yörüks to assess their needs and requests.</p> <p>If the requested support concerns materials, the issue will be addressed through in-kind assistance.</p> <p>If there is an additional request beyond material support, a disturbance allowance will be considered.</p> <p>This payment will be provided as a one-time compensation.</p> <p>This allowance will not be lower than the minimum wage set by the relevant</p>

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 48 / 91

Affected Person	Assistance Type	In-kind / Cash supports & Disturbance Allowance
		<p>institutions in Türkiye as of February 2025 (22,104.67 TL) and will not exceed the food expenditure level for a family of four (24,035.59⁴³ TL). During this process, face-to-face interviews will continue to be conducted with illiterate members, as identified by the heads of households. Tosyalı commits to keeping this land available for the Yörüks' accommodation in a suitable manner, unless they themselves choose otherwise.</p> <p>Tosyalı declares that the area is allocated to itself and commits that no additional works (such as OOSB expansion) will take place in this area. In case disturbances persist after the relocation, mukhtars and OOSB officials will also be included in the consultation process, and cooperation will be ensured to find a solution.</p>
Member of Yörük families in working-age	Local employment	They will be given priority in local employment opportunities upon application.
Scrap collectors among the Yörük families	Local employment	<p>It has been determined that they are reluctant to declare their earnings from this area, which serves as an additional source of income. Therefore, the amount of cash support for potential loss cannot be calculated. However, for any requests that may arise during the consultation processes, one-time support will be provided under the disturbance allowance (22,104.67-24,035.59 TL)-</p> <p>Losses of individuals from different sources of income within the same family will be addressed separately. The PAP will be included within the scope based on declarations regarding income loss related to the specified livelihood source.</p> <p>Due to these individuals working insecurely in uninsured jobs, it has been deemed sustainable to direct them towards regular income-generating, insured employment opportunities. Therefore, Tosyalı commits to giving priority to these individuals in local employment, if they express such requests.</p>
Member of Yörük families	Disturbance allowances	Following the fulfillment of their demands, the Yörüks will continue to be monitored during their adaptation to the new living conditions. Any new

⁴³ As of 30.04.2025. Source: <https://www.turkis.org.tr/storage/2025/04/2025-Nisan-A-Y.pdf>

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 49 / 91

Affected Person	Assistance Type	In-kind / Cash supports & Disturbance Allowance
		<p>requests they raise during this process will be listened to, and those deemed appropriate will be considered by Tosyalı.</p> <p>The PAP will be informed that they are entitled to a disturbance payment. The PAP will be offered both options - disturbance payment or employment opportunity- and action will be taken based on their preference.</p>
Member of Yörük families	Collective efforts	<p>Prior to land entry of contractor, a meeting will be organized to obtain information about the measures implemented by nearby SPPs regarding the Yörüks (if any). Officials from the OOSB will also attend the meetings.</p> <p>The meetings will facilitate the transfer of experiences from previous projects.</p> <p>The meeting will be held once, with the participation of personnel at the project management level.</p> <p>These meetings will also be conducted after the contractor enters the site (during the construction phase).</p> <p>A regular meeting series will be established with project managers from nearby facilities, especially OOSB management. The first meeting will occur right after the contractor enters the site, and the second at the end of the first construction year, involving Tosyalı, the contractor, OOSB management, and other investment area managers.</p>
Member of Yörük families	Cooperation with local authorities	<p>In order to prevent the Yörüks from being forced to relocate again in the future due to the expansion of areas such as the OOSB, which has been identified among the cumulative impacts, support will be provided to secure alternative land or assist in the search for alternative land in cooperation with local authorities. The aim is to ensure the suitability and livability of the new areas for Yörük use.</p> <p>The first meeting with local authorities will be held pre-construction phase. This meeting can be conducted either face-to-face with each neighborhood headman individually or as a joint group meeting. Along with the headmen, local government units such as the municipality and district governor's office will also participate in these meetings.</p>

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 50 / 91

Affected Person	Assistance Type	In-kind / Cash supports & Disturbance Allowance
		After the contractor enters the site, similar meetings will be held once a year during the construction period.
Illiterate adults	Guidance	Guidance will be provided to household representatives who are able to attend meetings but experience difficulties in reading and understanding the documents presented to them.
Elderly individuals	Participation support	If the Yörük families request the participation of all household members, the elderly, and those in need of care will be visited in their homes in the Toprakkale district center.
Home bound / bedridden individuals		

As previously mentioned, the selection of the area was carried out in consultation with the Yörüks, and mutual agreement was reached. Since the designated area is allocated to Tosyalı, no other project activities will take place there. Transparent and open communication steps will be implemented through consultations with the neighboring school to maintain positive stakeholder relations.

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 51 / 91

8 GRIEVANCE MECHANISM

8.1 GM contact information

The primary responsibility of Tosyalı is to record and monitor complaints. In addition to Tosyalı, the social experts of the Contractor will also be present on-site, following the guidelines in the SEP. Their duties include the recording and management of complaints. These designated personnel will adhere to the Grievance Mechanism to document and address all complaints from stakeholders, overseeing the specified mitigation measures. To enhance stakeholder awareness and facilitate transparent complaint submissions, project contact information will be disseminated via information meetings, project brochures, and the project website. Various official channels are available for stakeholders to voice their complaints.

Specific actions in line with Entitlement Matrix will be included in the LRP brochure. Tosyalı commits to sharing the measures to be implemented through updates to the LRP brochure, including specific actions aligned with the Entitlement Matrix. Upon finalization and approval of the LRP, Tosyalı will share these measures, together with the approach to and timeline for their implementation, with the affected parties.

Tosyalı commits to disclosing online, and making available to the Financing Parties for their online disclosure, the ESIA, SEP, HRIA, CCRA, and grievance mechanism details in Turkish and English. Hard copies of the ESIA, NTS, SEP, and HRIA summary will be made available to local stakeholders in Turkish. The LRP will be disclosed in a redacted manner to avoid the disclosure of any personal information of the PAPs. During disclosure, Tosyalı will put in place a process to allow stakeholders to provide feedback via email.

The Project has a general community grievance mechanism in place, through which livelihood restoration and land acquisition-specific grievances can be addressed. The Project will update the grievance mechanism to explicitly specify that land acquisition and LRP-related grievances will be processed through the general community grievance mechanism.

Tosyalı needs to make sure that no sensitive or confidential information is disclosed to external parties as part of LRP disclosure.

Complaints related to land acquisition and the LRP will be processed through the general community grievance mechanism.

Ethical issues will be reported to the Holding's ethics email address or relevant personnel via verbal communication. Contact details are provided below.

External stakeholders include local communities, neighboring organizations, national or local government institutions, non-governmental organizations, suppliers, academic institutions, media outlets, and other entities.

External stakeholders can initiate the grievance/feedback mechanism through the following channels. They may file grievances or provide feedback anonymously or by willingly sharing their personal information, free of charge:

Tosyalı Holding:

- Website: <https://www.tosyaliholding.com.tr/>
- Address: Barbaros, Sütçü Yolu Cd. No:72, 34746 Ataşehir/İstanbul
- E-mail: ges.projelistirme@tosyaliholding.com.tr
- Phone: 0216 544 36 00
- For ethical issues: etik@tosyaliholding.com.tr

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 52 / 91

Tosyalı Demir Çelik

- Website: <https://www.tosyalidemircelik.com.tr/>
- Address: Organized Industrial Zone, Sarıseki/Hatay
- Phone: 0326 656 21 30 (1735)

Project

- Address: Osmaniye İli Toprakkale İlçesi Türkmen Büyüktüysüz Köyü 246 Ada 2 Parsel
- Contact person: Duygu Sena KOLUÇOLAK (Social Expert & CLO)
- Phone number of contact person: 0530 930 2546
- Appendix 1 Grievance Registration Form, Appendix 2 Grievance Closeout Form, and Appendix 3 Grievance Log: PAPs have the opportunity to complete grievance registration forms available at the construction site and other accessible public locations such as village coffeehouse.
- Project specific Grievance and Feedback Submission Page: <https://hedef360.com/seclink/>

Other channels;

Presidency's Communication Center (CİMER)

CİMER serves as a platform for citizens to report various issues, lodge complaints, and make requests. CİMER has been actively utilized by citizens since its inception. This system operates through dedicated software and a web page developed by the Presidential Department of Communications, facilitating communication between citizens and the government, allowing applications to be submitted at any time and from anywhere.

In addition to its general use, the CİMER system will also be employed at the Project level to receive and address complaints from individuals affected by the Project or other concerned parties. As per the Right to Information Act, every individual has the right to access information, following the procedures and principles outlined in written regulations. This can be done by submitting a written request through the Right to Petition or online at <https://www.cimer.gov.tr/>.

Foreigners Communication Center (YİMER)

The Republic of Türkiye Ministry of Interior, under the Presidency of Migration Management, is committed to providing accurate, rapid, and reliable information in accordance with the law 24/7 through YİMER 157 and other service channels for those seeking assistance. YİMER 157 provides continuous assistance to foreigners 24/7, 7 days a week, helping them with questions related to visas, residence permits, international protection, temporary protection, and more. It plays a crucial role in identifying victims of human trafficking and conducting rescue operations for those affected by migrant smuggling at sea. YİMER 157 serves as a lifeline for foreigners, aiming to be their primary source for information and assistance, accessible both within Türkiye and abroad.

9 ROLES AND RESPONSIBILITIES

The general organizational chart of the Project is given in Figure 2, and overall, they will be responsible for the appropriate implementation of ESIA Report, ESMP and other relevant sub-management plans as per the requirements of IFC PSs to ensure the fully performance compliance of the Project.

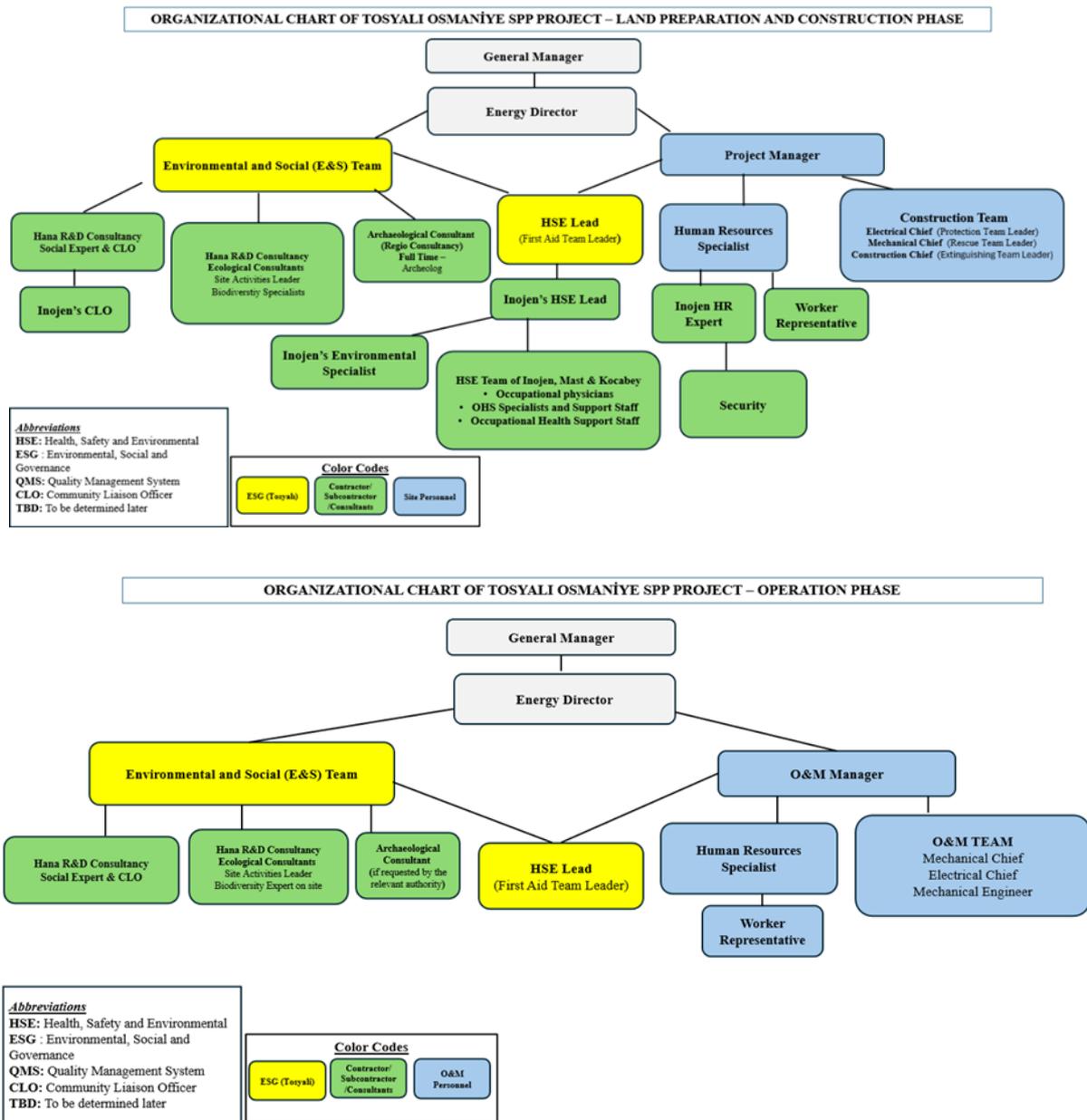


Figure 2. Organizational Structure of the Project Owner

As illustrated in the diagram labeled Figure 2, a Social Expert & Community Liaison Officer has been appointed. Throughout the LRP process, consultation activities within this organizational chart structure will be carried out under the coordination of the Environmental and Social (E&S) Team with the participation of the Social Expert & CLO. All funding to be used during the LRP process will be organized by the General Manager/Energy Director. The

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 54 / 91

Project Manager (and Operation & Maintenance (O&M) Manager during the operation phase) will be responsible for transferring the financial resources (in-kind or cash) to the stakeholders on the site. During this process, the Social Expert & CLO will play the role of focal point with E&S Team. The Social Expert & CLO's responsibilities in the LRP process will be as follows in detail:

- The Social Expert & CLO will report hierarchically to the E&S Team within Tosyalı.
- The Social Expert & CLO will be actively present in the field.
- Tosyalı commits to ensuring that the Social Expert & CLO remains in an easily accessible position at all times, including during the implementation of the LRP.
- Activities conducted by the Project Manager to date have been transferred to the Social Expert & CLO and integrated into the ongoing process.
- Face-to-face meetings, consultations, presentations, and other participation methods to be carried out with the Yörük families subject to the LRP will be led by the Social Expert & CLO.
- All consultation processes will be documented by the Social Expert & CLO.
- The Social Expert & CLO will be responsible for the functioning of the grievance mechanism, including appropriately and promptly recording (at least within 1 day), classifying, and responding to all feedback such as complaints (at least within 2 days), requests, suggestions, questions, etc., received from external stakeholders.
- The Social Expert & CLO will initiate the resolution process, follow up on it, and communicate the outcome to the stakeholder (at least within 10 days).
- In the case of unresolved complaints, the Social Expert & CLO will provide support to the complainant in legal processes, if required.

After the implementation of the LRP, the disturbance allowance conditions of the Yörük community will be monitored by the Social Expert & CLO.

If the Yörük community has additional requests, these will be recorded by Social Expert & CLO on Grievance Mechanism. The agreed-upon solution will be communicated to the Yörüks by the Social Expert & CLO.

In case of additional financial needs, the General Manager/Energy Director will provide support for the LRP financing. The Project Manager (or O&M Manager during the operation phase) will be responsible for managing the implementation of additional measures on the site, too.

Tosyalı has ensured the inclusion of a social expert with prior RAP/LRP experience in the team, Social Expert & CLO, as presented in the Figure 2. This expert will be responsible for overseeing the LRP process. The same expert will also follow up on meetings held with the Yörüks and maintain records of other meeting notes. Prior to the commencement of construction, the process will be monitored by this specialist. Following the implementation of the LRP, the specialist will also prepare the audit report. After submission of the quarterly report, the follow-up of actions taken will again be carried out by this expert.

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 55 / 91

10 IMPLEMENTATION BUDGET

The material procurement for expenses officially invoiced by Project Owner so far includes an amount of 450,000 TRY.

Based on the results of consultations with the Yörük families, expenses will also be incurred during the relocation and installation phases. However, these do not have a definitive budget. On the other hand, activities carried out during stakeholder participation processes will also be included in the LRP budget. Additionally, expenses covered under the GM scope will also be part of the LRP budget.

The LRP will be updated both before the land entry and at the closure stage, and the budget will be revised accordingly.

Monitoring and evaluation activities will also be included in these expenses and will be accounted for within the budget.

Sample budget has been prepared by Tosyalı Osmaniye SPP Project. Details the designated item can be found on the following page.

SAMPLE LRP BUDGET

SOCIAL PAYMENTS UNDER THE LRP							
PAYMENTS MADE TO YÖRÜK FAMILIES							
APPLICATION	LESSON	DETAIL	RESPONSIBILITY	PROJECT PHASE	TOTAL COST (TL) (EXCLUDING VAT)	DEADLINE	NUMBER OF PEOPLE
Completed Application							
Activities Conducted Within the Scope of LRP							
Relocation Support	Providing temporary shelter support to nomads	Due to the displacement of the nomads, seven tent materials were procured and delivered to three families. Documents of interest are included in the LRP appendix.	E&S Team General Manager/Energy Director	Pre-Construction (Pre-Land Entry/Land Clearance)	<i>Redacted pursuant to KVKK</i>	3.03.2025	12 people
Suitability of the moving area	The suitability of the new location for the activities of the Yörüks will be regularly monitored.	The ground was leveled in the new area designated for the Yörük families.	E&S Team General Manager/Energy Director	Pre-Construction (Pre-Land Entry/Land Clearance)	<i>Redacted pursuant to KVKK</i>	4.04.2025	12 people
SEP Activities Conducted Within the Scope of LRP							
Complaint Redress Mechanism	The GM application is integrated into the overall GM, including the costs of implementing and operating the complaint mechanism.	There was a need to give wish complaint notification form in the form of flyers to the Yörüks in order to inform them.	Social Expert & E&S Team	Pre-Construction (Before Land Entry/Land Clearance)	<i>Redacted pursuant to KVKK</i>	3.03.2025	12 people
Information activities	Informing Yoruk families about the project definition and their rights.	There was a need to distribute brochures in the form of flyers to inform the Yörüks.	Social Expert and E&S Team	Pre-Construction (Pre-Land Entry/Land Clearance)	<i>Redacted pursuant to KVKK</i>	3.03.2025	12 people
Satisfactory PAP Level	Ongoing interaction with Yorüks families	Regular telephone calls were made to learn about the satisfaction, requests and complaints of the Yörüks.	Social Expert and E&S Team	Pre-Construction (Pre-Land Entry/Land Clearance)	<i>Redacted pursuant to KVKK</i>	2.06.2025	12 people
Planned Implementation							
Activities to be Carried Out Within the Scope of LRP							
Animal Health Management	Monitoring and support can be provided to reduce disease risks during the move.	Monitoring will be carried out to reduce disease risks during the move and veterinary support will be provided when necessary.	E&S Team General Manager/Energy Director	within one year of resettlement	will be calculated during this process if necessary	If necessary	12 people
Disturbance allowances	Loss of livelihoods for Yörüks.	There was no loss of livelihood, but we still maintain this article.	E&S Team General Manager/Energy Director	within one year of resettlement	To be determined one year after implementation of the LRP	If necessary	12 people
Livelihood Support	Feed support for Yörük animals	Feed support will be provided to Yörüks so they can feed their animals in their new living spaces.	E&S Team General Manager/Energy Director	within one year of resettlement	<i>Redacted pursuant to KVKK</i>	If necessary	12 people
	Providing grazing access for sheep	Sheep belonging to Yörüks may be allowed to eat the grassland under the panel for feeding.	O&M Manager	Operation	-	If requested	12 people
Suitability of the Moving Area	The suitability of the new location for the activities of the Yörüks will be regularly monitored.	The suitability of the activities of the Yörüks in their new living spaces as a result of their displacement will be regularly monitored by the Social Expert and the Environmental and Social Team, and in case of non-compliance, a new area will be allocated.	Social Expert and E&S Team	Pre-Construction (Before Land Entry/Land Clearance) Construction	To be determined one year after implementation of the LRP	If necessary	12 people
Employment of Yörüks	Prioritizing local employment	Support will be provided for local employment in order to facilitate the livelihood of Yörüks.	Social Expert and HR Expert E&S Team	Construction and Operation	If requested will be calculated at that stage	If necessary	12 people
	Providing support to Yörüks in transporting their animals	After monitoring the Yörüks' suitability for their new living conditions, support will be provided for the transportation of animals depending on the process.	E&S Team General Manager/Energy Director	within one year of resettlement	will be calculated at that stage	If necessary	12 people
	Providing feed warehouse support	If storage areas become narrow after the implementation for feed support, feed storage support will be provided to the Yörüks.	E&S Team General Manager/Energy Director		will be calculated at that stage	If necessary	12 people

SOCIAL PAYMENTS UNDER THE LRP							
PAYMENTS MADE TO YÖRÜK FAMILIES							
APPLICATION	LESSON	DETAIL	RESPONSIBILITY	PROJECT PHASE	TOTAL COST (TL) (EXCLUDING VAT)	DEADLINE	NUMBER OF PEOPLE
Closing Audit	All KPIs must be completed during the closing audit.	Completion of all KPIs during the closing audit.	E&S Team General Manager/Energy Director	End of LRP Implementation	will be calculated at that stage	If necessary	12 people
SEP Activities to be Carried Out Within the Scope of LRP							
Quarterly Monitoring Reports	There is a cost to provide a report covering LRP monitoring at the end of each quarter.	Consumable expenses for submitting monitoring reports.	Social Expert and E&S Team	All Stages	Redacted pursuant to KVKK		12 people
		Consulting expense for third-party reporting	E&S Team		Redacted pursuant to KVKK		12 people
		There is a transmission cost for delivering the reports to the relevant parties.	Social Expert and E&S Team		Redacted pursuant to KVKK		12 people
Satisfactory PAP Level	Ongoing interaction with Yörük families	Consumable expenses for submitting monitoring reports.	Social Expert and E&S Team General Manager / Energy Director	All Stages	Redacted pursuant to KVKK		12 people
LRP-related cases	Follow-up of cases filed under LA	If a lawsuit is filed within the scope of land acquisition, these processes will also be included in the monitoring scope.	Social Expert and E&S Team General Manager / Energy Director	ALL stages	Redacted pursuant to KVKK	If necessary	12 people
Information activities	Disclosure of project-related information.	There was a need to website to inform the Stakeholder.	Social Expert and E&S Team	All phases	Redacted pursuant to KVKK		
PAYMENTS MADE TO OTHER STAKEHOLDERS							
SEP activities completed for local people							
APPLICATION	LESSON	DETAIL		PROJECT PHASE	TOTAL COST (TL) (EXCLUDING VAT)	DEADLINE	NUMBER OF PEOPLE
Information activities	Informing Stakeholder about the project definition and their rights.	There was a need to distribute brochures in the form of flyers to inform the Stakeholder.	Social Expert and E&S Team	Pre-Construction (Pre-Land Entry/Land Clearance)	Redacted pursuant to KVKK	3.03.2025	260 households
Complaint Redress Mechanism	The GM application is integrated into the overall GM, including the costs of establishing and operating the complaints mechanism.	There was a need for a software application that would enable stakeholders to easily convey their wishes, complaints and suggestions regarding the project.	Social Expert and E&S Team	All stages	Redacted pursuant to KVKK		260 households
		There was a need to create request/complaint boxes so that stakeholders could directly submit their requests, complaints and suggestions regarding the project.			Redacted pursuant to KVKK		260 households
		Paper costs are incurred to facilitate the recording of requests/complaints.			Redacted pursuant to KVKK		260 households
Social responsibility activities	Involving stakeholders in planning processes	During the stakeholder participation meetings, the request for a dough kneading machine for the benefit of the village was conveyed to us by the Büyüktüysüz Headman.	Social Expert and E&S Team General Manager / Energy Director	Construction and Operation	Redacted pursuant to KVKK		260 households
		Construction of 30 steel profile pergolas for Büyüktüysüz Mukhtar's Office			Redacted pursuant to KVKK		260 households
Completed SEP Activities for the Workforce							
APPLICATION	LESSON	DETAIL		PROJECT PHASE	TOTAL COST (TL) (EXCLUDING VAT)	DEADLINE	NUMBER OF PEOPLE
Complaint Redress Mechanism	The GM application is integrated into the overall GM, including the costs of establishing and operating the complaints mechanism.	There was a need for a software application that would enable stakeholders to easily convey their wishes, complaints and suggestions regarding the project.	Social Expert and E&S Team	All stages	Redacted pursuant to KVKK		350 employee
		There was a need to create request/complaint boxes so that			Redacted pursuant to KVKK		350 employee

SOCIAL PAYMENTS UNDER THE LRP							
PAYMENTS MADE TO YÖRÜK FAMILIES							
APPLICATION	LESSON	DETAIL	RESPONSIBILITY	PROJECT PHASE	TOTAL COST (TL) (EXCLUDING VAT)	DEADLINE	NUMBER OF PEOPLE
		stakeholders could directly submit their requests, complaints and suggestions regarding the project.					
		Paper costs are incurred to facilitate the recording of requests/complaints.			<i>Redacted pursuant to KVKK</i>		350 employee
Planning SEP Activities for the Local People							
APPLICATION	LESSON	DETAIL	RESPONSIBILITY	PROJECT PHASE	TOTAL COST (TL) (EXCLUDING VAT)	DEADLINE	NUMBER OF PEOPLE
Information activities	Trainings & Meetings	Catering materials, training brochures, transportation costs	Social Expert and E&S Team	All phases	<i>Redacted pursuant to KVKK</i>		260 households
Planning SEP Activities for Suppliers & Potential Buyers							
APPLICATION	LESSON	DETAIL	RESPONSIBILITY	PROJECT PHASE	TOTAL COST (TL) (EXCLUDING VAT)	DEADLINE	NUMBER OF PEOPLE
Information Activities	Information and collaboration meetings, apply chain and potential buyers	Catering materials, training brochures, transportation costs	Social Expert and E&S Team	All phases	<i>Redacted pursuant to KVKK</i>		
	Informing Stakeholder, collaborators and workers about the project definition and their rights.	Establishment of a website to ensure the disclosure and publication of information and documents related to our projects	Social Expert and E&S Team	All phases	<i>Redacted pursuant to KVKK</i>		

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 59 / 91

11 MONITORING AND REPORTING

To ensure that physical and economic resettlement impacts on Yörük families are effectively mitigated and managed throughout all phases of the project, a comprehensive socio-economic monitoring plan will be implemented. This plan focuses on the identification of affected households, continuous stakeholder engagement, implementation of livelihood restoration measures, and timely grievance resolution.

During the pre-construction phase, emphasis will be placed on identifying the seasonal and semi-permanent presence of Yörük families in the vicinity of the project site. Early consultations will be conducted to understand their livelihood patterns, relocation needs, and expectations related to support, if requested. A functional and culturally appropriate grievance mechanism will be in place before any land access.

Throughout the construction and operation phases, the Project Owner will ensure transparent communication and engagement with Yörük communities, provide necessary livelihood support (particularly related to livestock), and track the performance of mitigation measures through regular stakeholder feedback. In the decommissioning phase, final consultations will be held, grazing areas will be rehabilitated as needed, and any remaining support will be provided to allow for the continued sustainability of pastoral livelihoods.

Progress will be tracked by using the indicators defined in the monitoring Table 13.

The success of this monitoring process will be measured by the effectiveness of mitigation actions, resolution of grievances, and the level of participation and satisfaction of affected households.

During the land preparation and construction, progress reports will be prepared on a quarterly basis. If the number of complaints received through the GM decreases, the reporting period may be extended to six months (semiannual). However, if the number of complaints increases, quarterly reporting will continue.

The LRP completion audit will be conducted no later than 1 year after the relocation is completed.

Table 13. Monitoring and Reporting

Issue	Subject	Project phase	Frequency	Responsibility	Parameter / KPI	Target
Livelihood Restoration	Identification of Yörük households residing temporarily or seasonally near the project site	Pre-construction (Prior to Land Entry/Land Clearance)	One-off	<u>Implementation:</u> Social Expert & CLO <u>Supervision:</u> E&S Team	Increase on household income level	Approximate 10% increase
Physical & Economic Resettlement	Identification of anticipated impacts (physical/economic displacement)	Pre-construction (Prior to Land Entry/Land Clearance)	One-off	<u>Implementation:</u> Social Expert & CLO <u>Supervision:</u> E&S Team	Number of relocated Yörük families.	100%
LRP implementation	Regular reporting Close out audit	Pre-construction (Prior to Land Entry/Land Clearance)	Internal regular reporting: Quarterly External Audit: Yearly	<u>Implementation:</u> Social Expert & CLO <u>Supervision:</u> E&S Team <u>Overall Responsible:</u> Project Owner	Quarterly submitted deliverables	Four quarterly report
Stakeholder Engagement	Conducting consultations with affected Yörük communities	Pre-construction (Prior to Land Entry/Land Clearance) Land Preparation and Construction	At least twice	<u>Implementation:</u> Social Expert & CLO <u>Supervision:</u> E&S Team	Number of consultation meetings	Mutual agreement/consensus with the Yörüks
Stakeholder Engagement	Inclusion of Yörük families in planning processes	Pre-construction (Prior to Land Entry/Land Clearance) Land preparation and construction	Ongoing	<u>Implementation:</u> Social Expert & CLO <u>Supervision:</u> E&S Team	Participation rate to the meeting	90% of identified households engaged
Grievance Redress Mechanism	Implementation and operation of grievance mechanism	All phases	Continuous	<u>Implementation:</u> Social Expert & CLO Worker Representative <u>Supervision:</u> E&S Team,	Percentage of grievances resolved	90% compliance
Relocation Support	Support for livestock transportation, temporary shelter, and feed storage	Pre-construction (Prior to Land Entry/Land Clearance)	One-off per household	<u>Implementation:</u> Social Expert & CLO <u>Supervision:</u> E&S Team <u>Overall Responsible:</u> General Manager/Energy Director	The rate of timely provision of relocation support	100% timely provision
Communication	Ongoing engagement with Yörük families	Construction & Operation	Monthly	<u>Implementation:</u> Social Expert & CLO <u>Supervision:</u> E&S Team	Number of communication activities conducted	90% completion of planned regular meeting
Livelihood Support	Provision of feed, veterinary support, grazing access	Construction & Operation	Seasonal / as needed	<u>Implementation:</u> Social Expert & CLO <u>Supervision:</u> E&S Team <u>Overall Responsible:</u> General Manager/Energy Director	Number of - guidance activity for illiterate household heads, - collaboration meeting with nearby Project owner - collective meeting with local authorities	90% completion
Employment of Yörüks	Priority in local employment	Construction	Seasonal / as needed	<u>Implementation:</u> Social Expert & CLO Inojen's HR Specialist <u>Supervision:</u> HR Specialist E&S Team	Number of persons wishing to benefit from local employment	Employment of all eligible applicants
Disturbances allowances	Monitoring their adaptation to the new living conditions.	Land preparation and construction	One-off	<u>Implementation:</u> Social Expert & CLO <u>Supervision:</u>	Number of persons receiving disturbance allowance	Payment to all eligible persons who apply

Issue	Subject	Project phase	Frequency	Responsibility	Parameter / KPI	Target
Animal Health Management	Monitoring and support to reduce risks of disease during relocation	All Relevant Phases	Periodic	E&S Team <u>Supervision:</u> E&S Team <u>Implementation:</u> Vet Services	Number of persons benefiting from animal health support	100% provision
Land Restoration	Restoration of affected grazing lands post-decommissioning	Decommissioning	One-off	<u>Supervision:</u> E&S Team <u>Implementation:</u> Social Expert & CLO	Completion rate of land improvement works (%)	100% provision
Final Consultations	Conducting final consultations before decommissioning	Decommissioning	One-off	<u>Implementation:</u> Social Expert & CLO <u>Supervision:</u> E&S Team	Number of final consultation meetings held	At least 2 meetings before the contractor's entry to the site
Number of PAPs	The number of people affected by land acquisition may vary. Regular consultations should be held to track these numbers, and additional consultations should be provided for newly added individuals.	All phases	Continuous	<u>Implementation:</u> Social Expert & CLO <u>Supervision:</u> E&S Team	The inclusion of new members in the Entitlement Matrix, where necessary	Ensuring that no PAP is excluded from the process and demonstrating that all new PAPs are assessed within the framework of the Entitlement Matrix.
Suitability of relocation area	The suitability of the new location in terms of the Yörüks' activities will be monitored regularly.	All phases	Continuous	<u>Implementation:</u> Social Expert & CLO <u>Supervision:</u> E&S Team	Whether the relocation area is satisfactory in terms of livelihood restoration. Whether the relocation area provides a sustainable restoration.	Ensuring full replacement in the relocation area. Zero livelihood loss impact in the relocation area.
Satisfactory level of PAP	The overall satisfaction of PAPs with the livelihood restoration measures implemented and the reestablishment of their economic activities will be monitored.	All phases	Continuous	<u>Implementation:</u> Social Expert & CLO <u>Supervision:</u> E&S Team	Inclusion of a satisfaction dimension in regular consultations	Zero complaints 100% satisfaction
Engagement of female household members	Participation of female household members will be ensured in all consultation processes.	All phases	Continuous	<u>Implementation:</u> Social Expert & CLO <u>Supervision:</u> E&S Team	In each consultation, female household members will be invited, and their participation in the meetings will be encouraged.	At least one female member from each household will participate in every meeting.
GM implementation integrated to public GM	Public GM must also cover the implementation of the LRP.	All phases	Continuous	<u>Implementation:</u> Social Expert & CLO <u>Supervision:</u> E&S Team	PAPs will be encouraged to use the GM within the scope of the LRP. Both open and confidential complaints related to the LRP will be monitored. The recording and processing of complaints will be carried out in a timely manner. Complainants will be documented with relevant attributes, such as gender.	The number of records entered for the LRP (including petitions, requests, suggestions, questions, and complaints) Zero open complaints for the LRP. Timely recording of inputs related to the LRP. Providing responses to all inputs as promptly as possible.
Lawsuits related to LRP	Monitoring of lawsuits filed within the scope of LA.	All phases	Continuous	<u>Implementation:</u> Social Expert & CLO <u>Supervision:</u> E&S Team <u>Overall Responsibility:</u> General Manager / Energy Director	If a lawsuit is initiated under the scope of land acquisition, these processes will also be incorporated into the monitoring.	Provision of legal and technical support by TOSYALI to the plaintiff, including lawyers, notaries, and similar services, for legal proceedings.
DVIGs within the PAP	Additional measures implemented for vulnerable individuals will be monitored.	All phases	Continuous	<u>Implementation:</u> Social Expert & CLO <u>Supervision:</u> E&S Team	Number of on-site/home visits to facilitate the participation of homebound and bedridden individuals. Documents prepared for illiterate individuals.	Completion of all targeted home visits.
Quarterly monitoring reports	Submission of a report covering LRP monitoring at the end of each quarterly period.	All phases	Quarterly	<u>Implementation:</u> Social Expert & CLO <u>Supervision:</u> E&S Team	Submission of four quarterly reports.	Submission deadline for each quarter
Closure audit	One closure audit is expected to be conducted	End of LRP implementation	Once	<u>Implementation:</u> Third party / External audit	Completion of all KPIs by the time of the closure audit.	Completion of final closure audit.

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 62 / 91

APPENDICES

Appendix 1 Grievance Registration Form

- Stakeholder Communication Form

	PAYDAŞ, DİLEK, ŞİKAYET İLETME FORMU	Doküman No	F.01.07.03
		Dok.Tarih:	05.04.2024
		Revizyon:	0
		Sayfa:	1 / 1
İLETİŞİME GEÇEN KİŞİNİN BİLGİLERİ: (İsminizin gizli kalmasını tercih ediyorsanız lütfen boş bırakın. Bildirimleriniz Proje Yönetimi tarafından aynı şekilde değerlendirilecektir.)			
Tarih :			
İrtibat Bilgisi : (Nasıl irtibata geçilmesini istiyorsanız buna göre gerekli bilgileri veriniz.)			
Posta yolu ile:.....			
Telefonla :			
E- Posta yolu ile :.....			
Tepkinizi belirtin : <input type="checkbox"/> Yorum <input type="checkbox"/> Şikayet		Şikayet Doldurulmuş iletişim formu suretinin alındığını teyit eden imza.....	
Kaydeden : Yorum / şikayet sunan kişi			
<input type="checkbox"/> Diğer (lütfen kim olduğunu belirtin)			
PROJE HAKKINDAKİ YORUMLARINIZ (Gerekirse sayfanın arka kısmından devam edebilirsiniz.)			
YORUM/ ŞİKAYETİNİZ HAKKINDA BİLGİLER			
Yorum/ Şikayetinizi tanımlayın (Gerekirse sayfanın arka kısmından devam edebilirsiniz.)			
Yorum / Şikayet İlgili Olay Tarihi			
<input type="checkbox"/> Tek seferli olay / şikayet (Tarih :			
<input type="checkbox"/> Bir defadan fazla mı oldu (Kaç Kez?.....)			
<input type="checkbox"/> Devam ediyor (Problem halen yaşanıyor)			
Problemi çözmek için ne öneriyorsunuz ? (Gerekirse sayfanın arka kısmından devam edebilirsiniz.)			
Bu kısım proje yönetimi tarafından doldurulacaktır.			
YORUM DURUMU			
Yorum Kayıt (E/H)	Sunum tarihi:	Kaydeden:	
Gerekli Tepki (E/H)	Müdahale tarihi:		
ŞİKAYETÇİ DURUMU			
Şikayet Kayıt (E/H):	Sunum Tarihi :	Kaydeden:	
Cevap Gönderim Tarihi :	Şikayet Kapatıldı (E/H) :	Kapatma Tarihi / İmzası :	
İRTİBAT NUMARASI : 0530 930 2546 (DUYGU SENA KOLUÇOLAK)			

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 63 / 91

- Employee Grievance Form

GES PROJESİ		Doc. No:	F.01.07.04
	ÇALIŞAN DİLEK, ŞİKAYET İLETME FORMU		Doc.Date:	3.09.2025
			Rev. No:	0
REFERANS NO: (Sorumlu kişi tarafından doldurulacaktır.				
ANONİM <input type="checkbox"/>	Kimliğinizi beyan etmek istemiyorsanız, bu formu doldururken, yanında 'Anonim' yazılı kutuyu işaretleyebilir veya izniniz olmadan kimlik bilgilerinizin üçüncü taraflarla paylaşılmamasını talep edebilirsiniz. 'Anoni' kutusu işaretlendiğinde, istek/ şikayet doğrudan yanıtlanmayabilir.			
ANONİM DEĞİL <input type="checkbox"/>				
İSİM SOYİSİM				
ADRES				
İLETİŞİM				
Olay ve şikayetin tanımı: Ne oldu ? Nerede oldu ? Kimin başına geldi ? Sorunun sonucu nedir ?				
Olay /Şikayet Tarihi:				
Bir seferli olay <input type="checkbox"/>	Birden fazla (kaç kez): <input type="checkbox"/>	Devam Eden : <input type="checkbox"/>		
Sizce bu sorunu nasıl çözmemiz gerekir ?				

LIVELIHOOD RESTORATION PLAN		CNR-PLN-TOS-OSM-LRP-001
Final	Date: January 2026	Page 64 / 91

Appendix 2 Grievance Closeout Form

	GRIEVANCE CLOSEOUT FORM		Doc. No: F.01.07.10 Doc.Date: 3.09.2025 Rev. No: 0
Grievance Closeout number:			
Reference No of Grievance			
Define long term action required (if necessary)			
Compensation Required ?			
CONTROL OF REMEDIATE ACTION AND DECISION			
Stages of the remediate Action		Deadline and Responsible Instutions	
1.			
2.			
3.			
4.			
5.			
This part will be filled amd signed by the complainant after S/he receives the compensation fees and /or his/her complaint has been remediated.			
Full Name		Signature	
Date			
Of the Complainant:			
Full Name		Signature	
Date			



Information About the Complainant

Complaint Number Şikayet Numarası	Project	Location	Created By Oluşturan	Complaint Date Şikayet Tarihi	Create Date Oluşturma Tarihi	Gender Male Female Cinsiyet Erkek Kadm	Contact information - Adress İletişim Bilgileri-Adres
--------------------------------------	---------	----------	-------------------------	----------------------------------	---------------------------------	---	--

WISHES, SUGGESTIONS, COMPLAINTS, FOLLOW-UP EVALUATION FORM

Information Regarding the Complaint								
Subject	Summary	Major / Minor	Priority Low Medium High Öncelik Düşük Orta Yüksel	Stakeholder Categories -PAPs -Mukhtars or other community representatives -Project Workers -Project Subcontractor -Sivil Society -Governmental Institution -Public Institutions Paydaş Katagorisi -Muhtarlar ve diğer topluluk temsilcileri -Proje Çalışanları -Proje Taşeronu -Sivil Toplum -Devlet Kurumu -Kamu Kurumu -Medya	Vulnerability (Yes/No) Please Specify	Category Katagori	Submission Type	

RM

Çözümüne ait Bilgiler/Information about the Solution									
Responsibility Tosyalı Supervision Construction Contractor Sorumlu Tosyalı Müşavir İnojen Alt Yüklenici	Yanıt Tarihi / Response Date	Solution Proposal	Status	Action / (Actions Taken to Resolve the Grievance) Aksiyon / (Şikayetin çözümüne yönelik yapılan işlemler)	Final Condition	Assigned Team	Attached a grievance Clouse out form İlgili çözüm formu	Comments	Attached photos if available Varsa ekli fotoğraflar

Doc. No:/ Dok. No: F. 01.07. 06 Doc. Date/ Yayın Tarihi :02.03.2025 Rev. Date / Rev. Tarihi :		
KPI		
Kapanış Süresi / Closure time (days)	Frequency/Şikayetin Sıklığı	Root Cause/Kök Neden

PAP and Stakeholder MEETING PLAN&PAP and Stakeholder Meeting Stakeholder Registration (F.01.07.05) is given as follows. Close-up visuals are also given after the form visual.

<div style="display: flex; justify-content: space-between; align-items: center;"> PAP and Stakeholder MEETING PLAN&PAP and Stakeholder Meeting Stakeholder Registration Doc. No/ Doküman No: F. 01.07. 05 Date of Issue/ Yayın Tarihi :19.04.2025 Rev. Date / Rev. Tarihi : </div>																			
Consultation Number Görüşme Numarası	Impact Area	Due Date	Actual Date	Explanation/Açıklama	Consultation Type/ Görüşme Türü	Tosyalı adına İletişim Karan Kişi / Contact Person on Behalf of Tosyalı	Date	Project	Location / Institution	Stakeholder Categories/ Paydaş Kategorileri	Participant Detaylı	Category	Sub Category Alt Kategorisi	Number of Participants	Priority / Öncelik	Project Phase Proje Aşaması	Gender	Age	Name and Surname
1																			
2																			
3																			
4																			
5																			
6																			
7																			
8																			
9																			

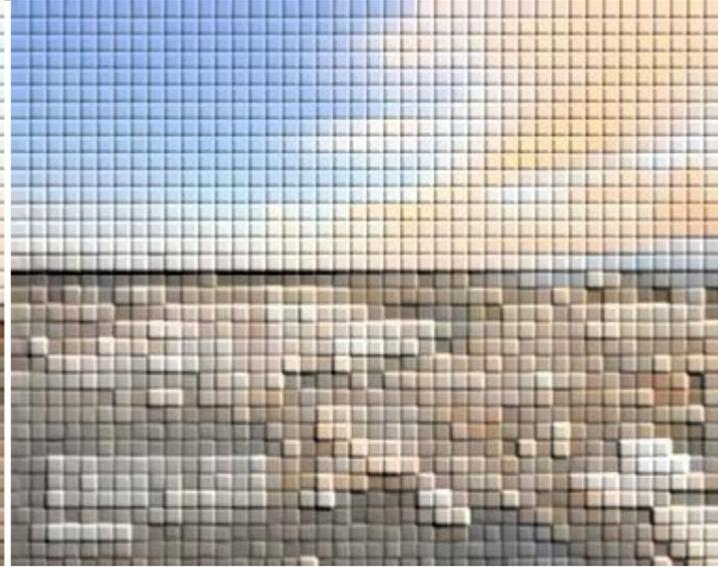
		PAP and Stakeholder MEETING PLAN&				
Consultation Number Görüşme Numarası	Impact Area	Due Date	Actual Date	Explanation/Açıklama	Consultation Type/ Görüşme Türü	Tosyalı adına İletişim Kuran Kişi / Contact Person on Behalf of Tosyalı

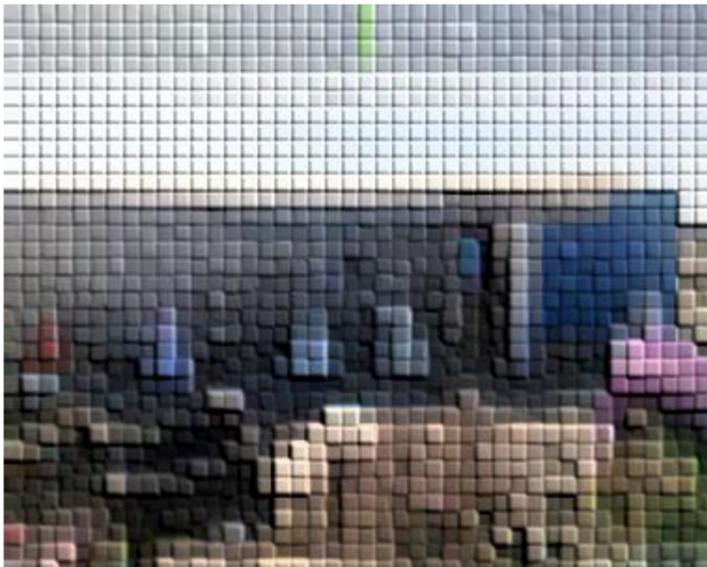
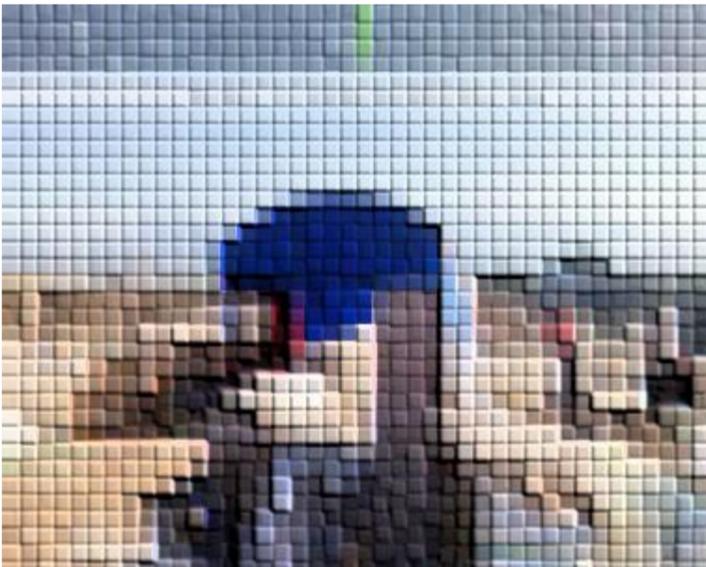
PAP and Stakeholder MEETING PLAN&PAP and Stakeholder Meeting Stakeholder Registration											
Tosyalı adına İletişim Kuran Kişi / Contact Person on Behalf of Tosyalı	Date	Project	Location / Institution	Stakeholder Categories Paydaş Kategorisi	Participant Details	Category Kategori	Sub Category Alt Kategori	Number of Participants	Priority / Öncelik	Project Phase Proje Aşaması	

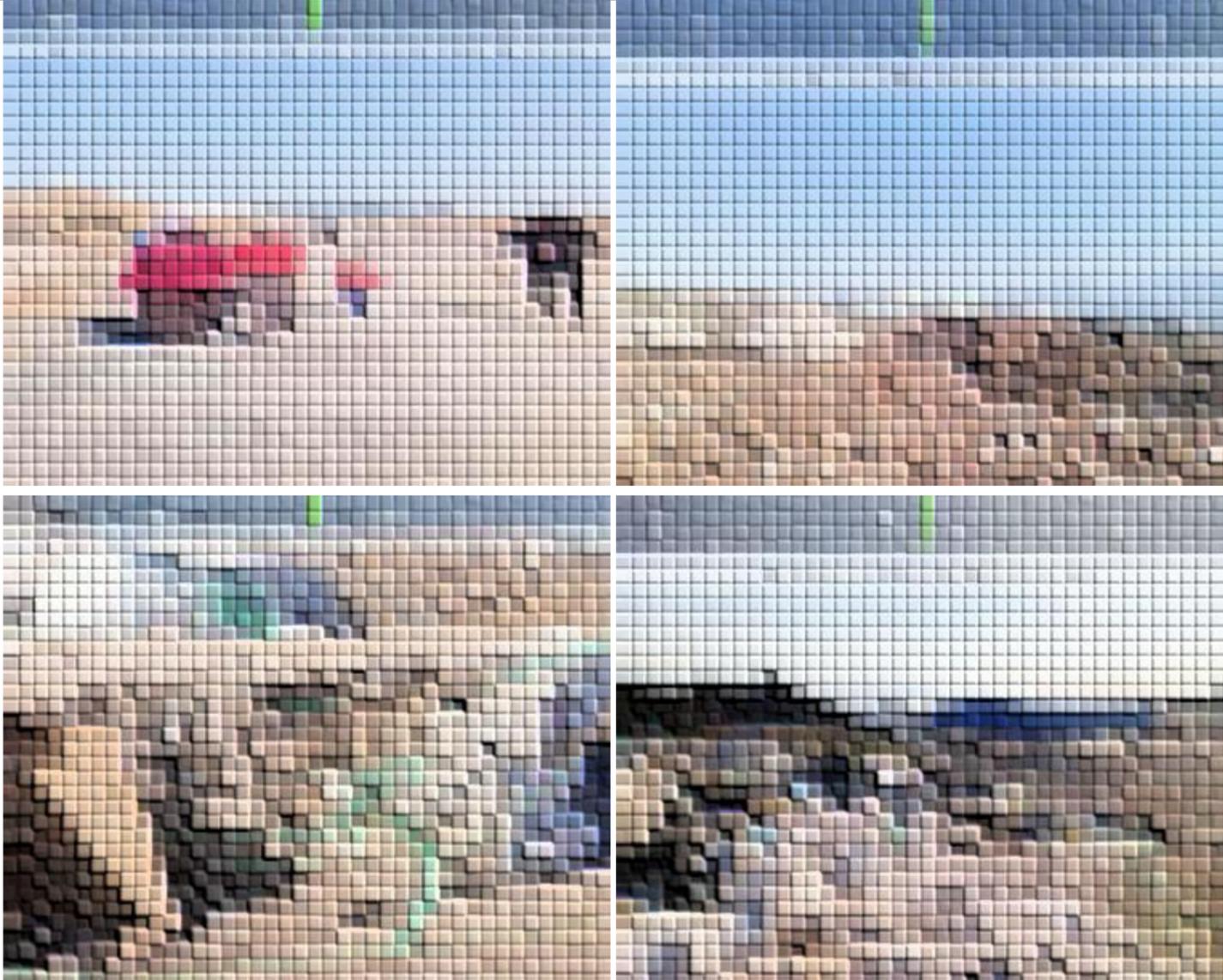
						Doc. No:/ Doküman No: F. 01.07. 05 Date of Issue/ Yayın Tarihi :19.04.2025 Rev. Date / Rev. Tarihi :
Sub Category Alt Kategori	Number of Participants	Priority / Öncelik	Project Phase Proje Aşaması	Gender	Age	Name and Surname

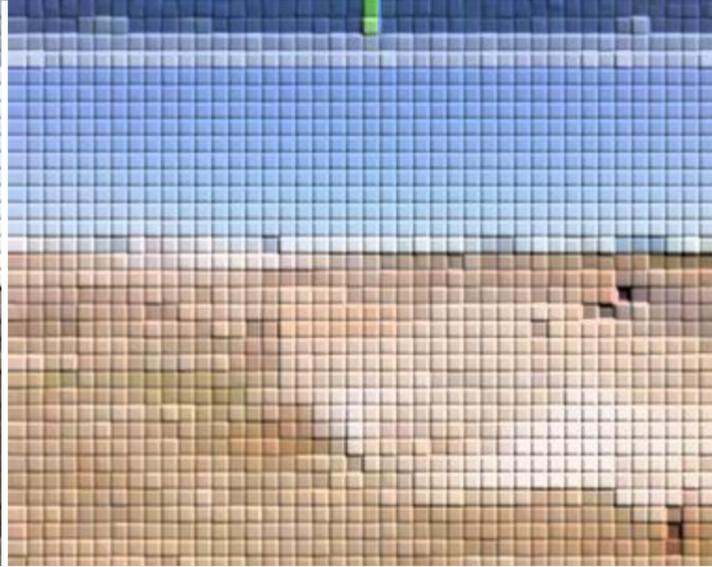
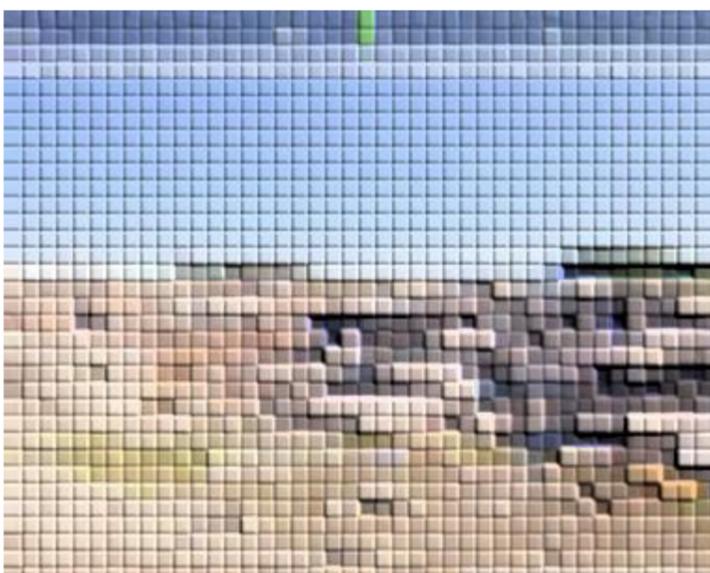
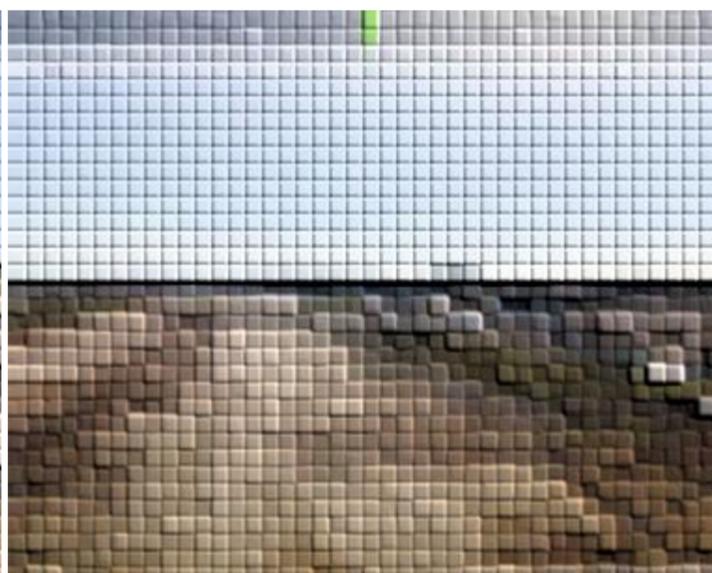
Appendix 4 Photographs taken during the meeting

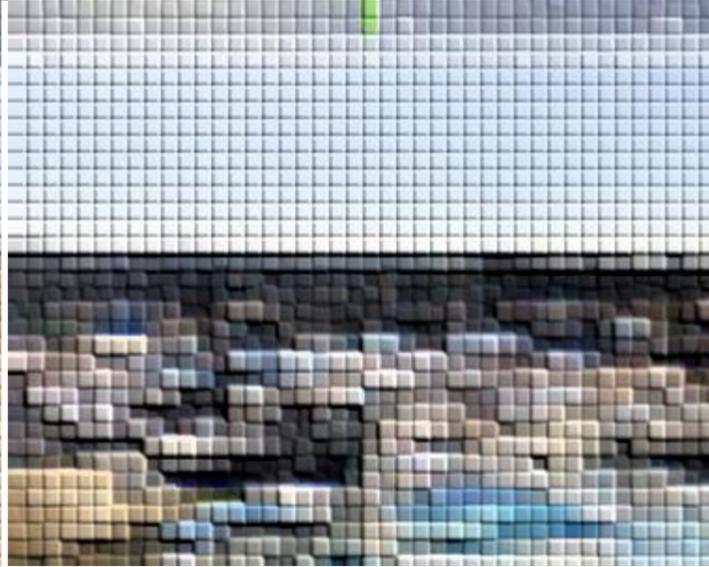
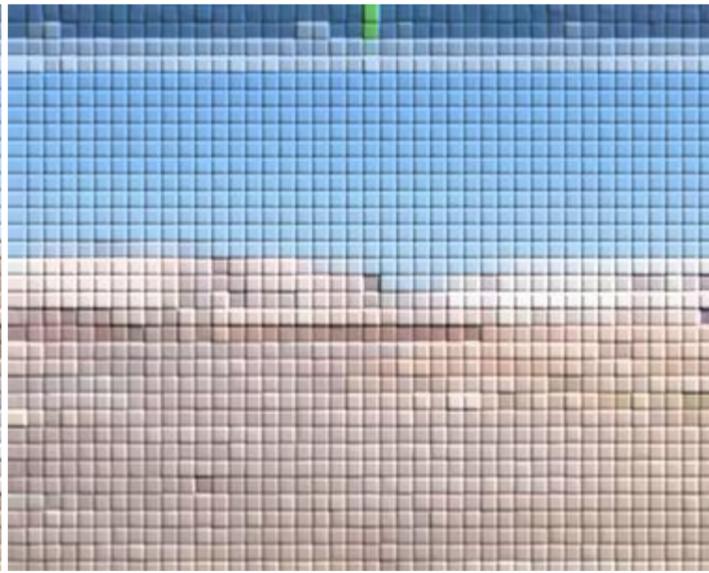
Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph
14.11.2024	Osmaniye / Toprakkale	Yörüks living in vicinity of the project area	Face-to-face Interview	

Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph	
					
14.11.2024	Osmaniye / Toprakkale	Yolbulan-Baştuğ Vocational and Technical Anatolian High School	Face-to-face Interview		

Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph	
28.01.2025	Osmaniye / Toprakkale	Yörüks living in vicinity of the project area	Face-to-face Interview		
					

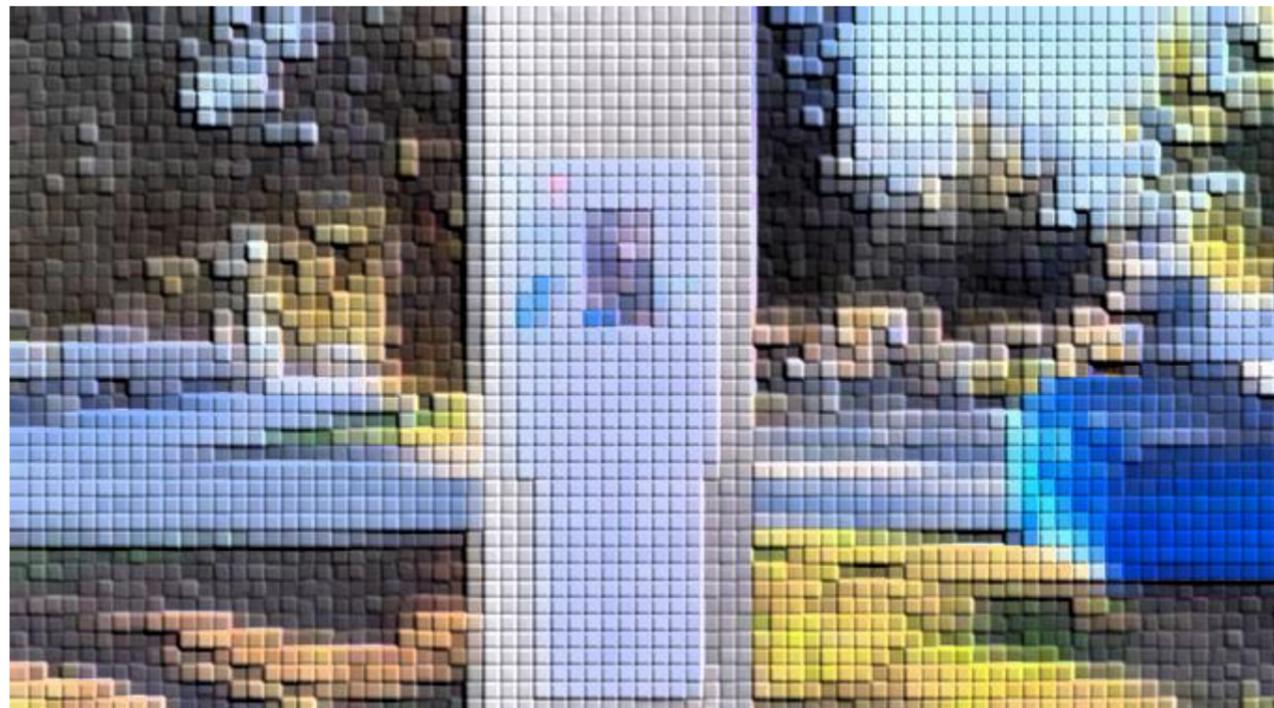
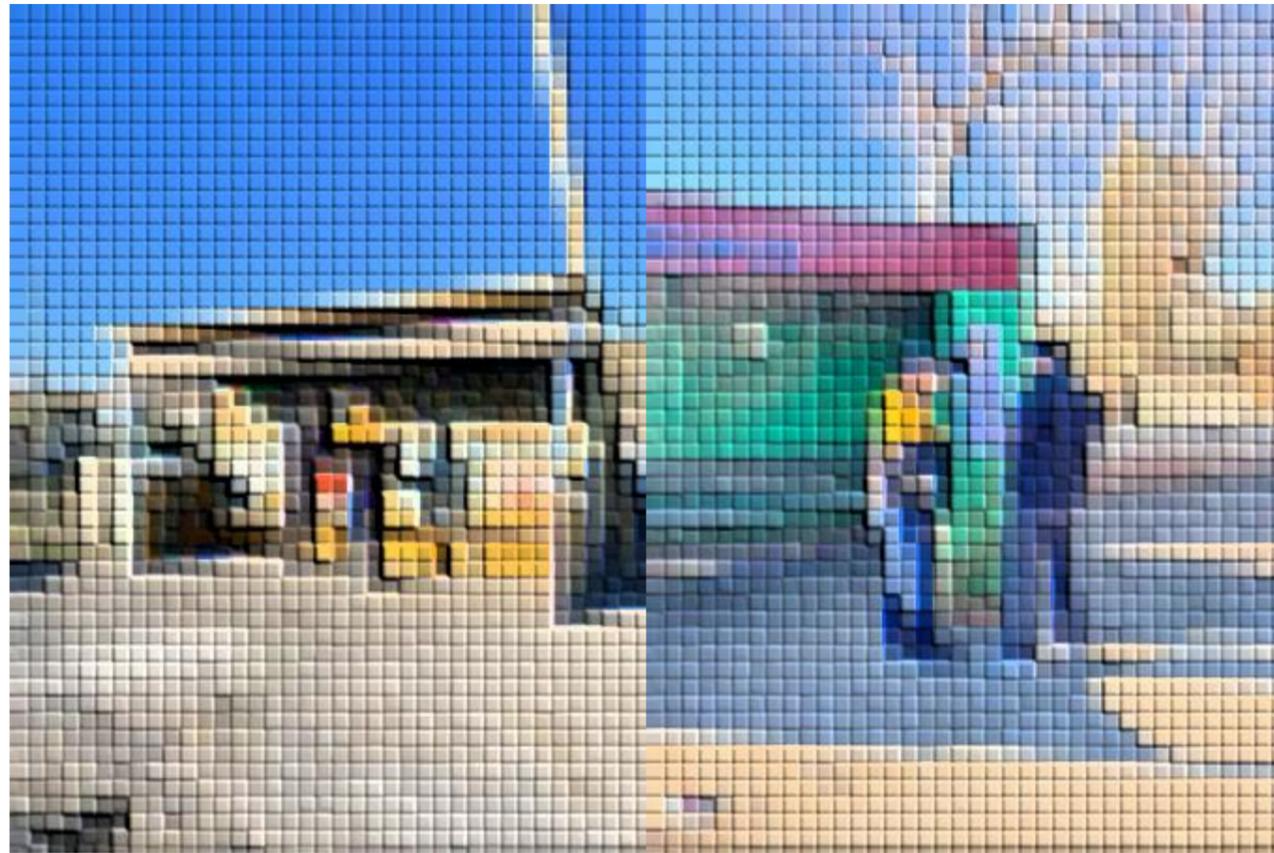
Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph
				

Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph	
					
					

Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph	
					
					

Date	Province / District / Settlement	Stakeholder	Type of Interview	Photograph
27.02.2025	Hatay / Erzin Hürriyet Neighborhood	Hürriyet Neighborhood Mukhtar	Mukhtar Interview Face-to-face Interview	

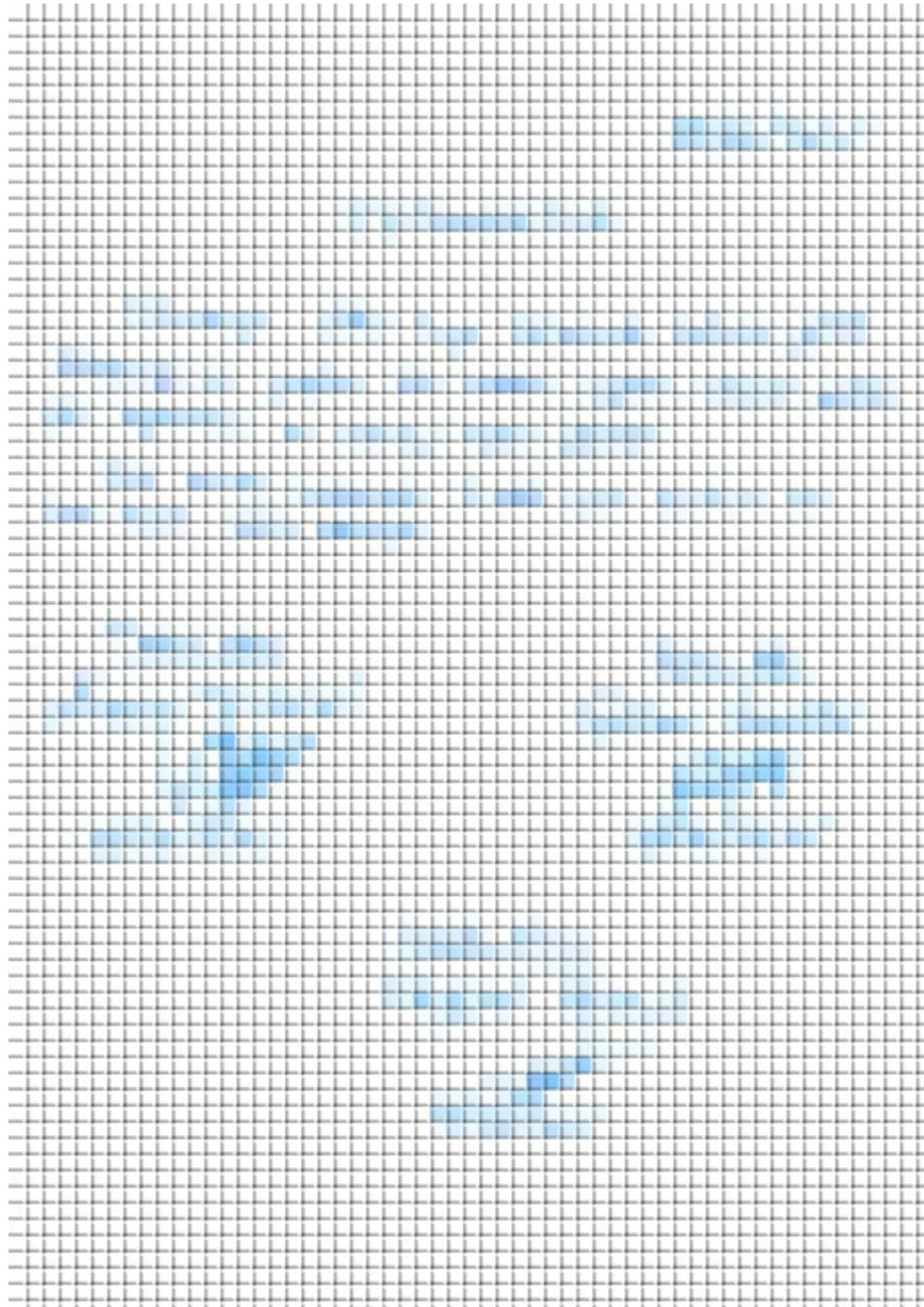








Appendix 6 Documents related to livelihood restoration for Yörük families



Material Delivery Report



Invoice for Purchased Material



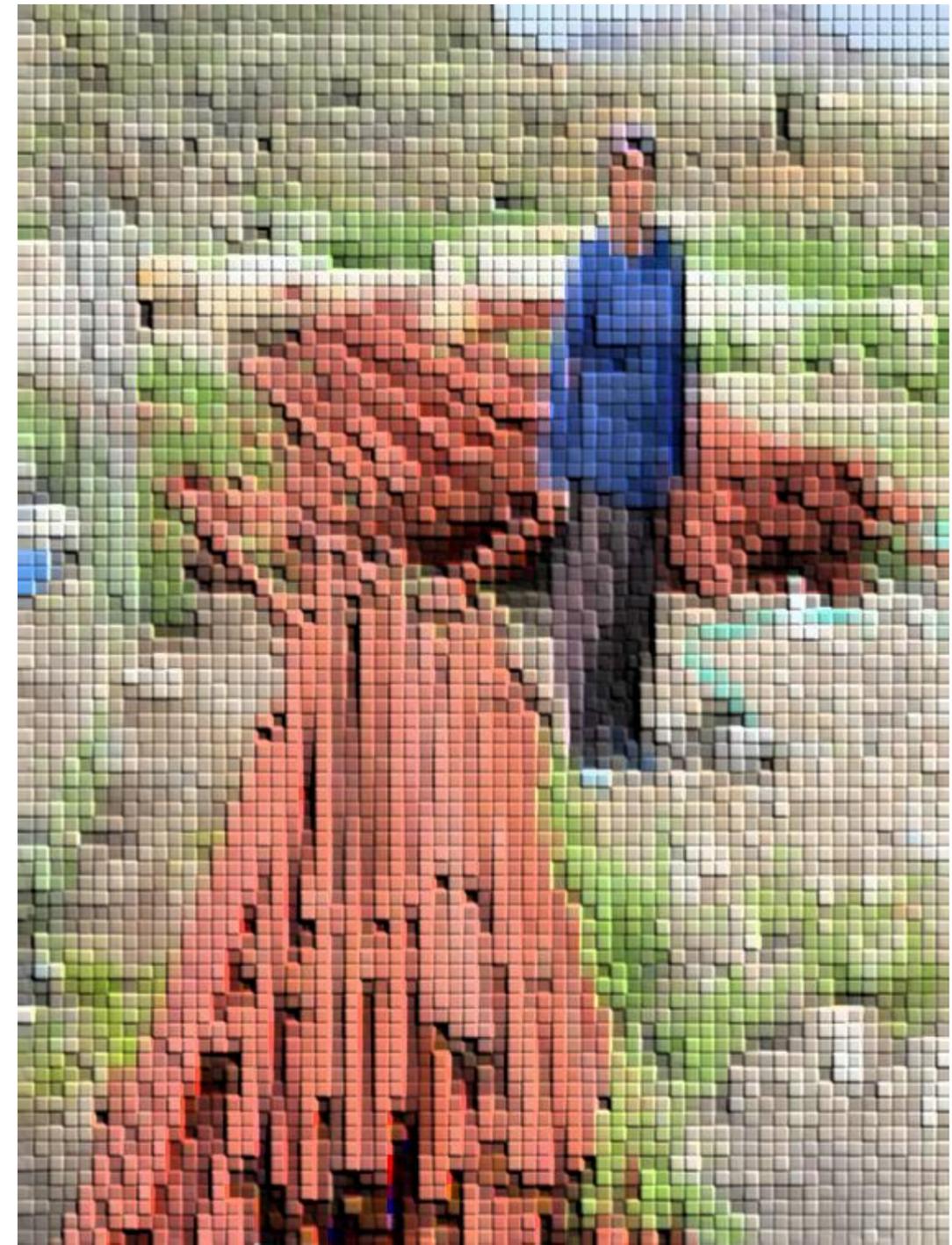
Photos of the delivered materials-1



Photos of the delivered materials-2

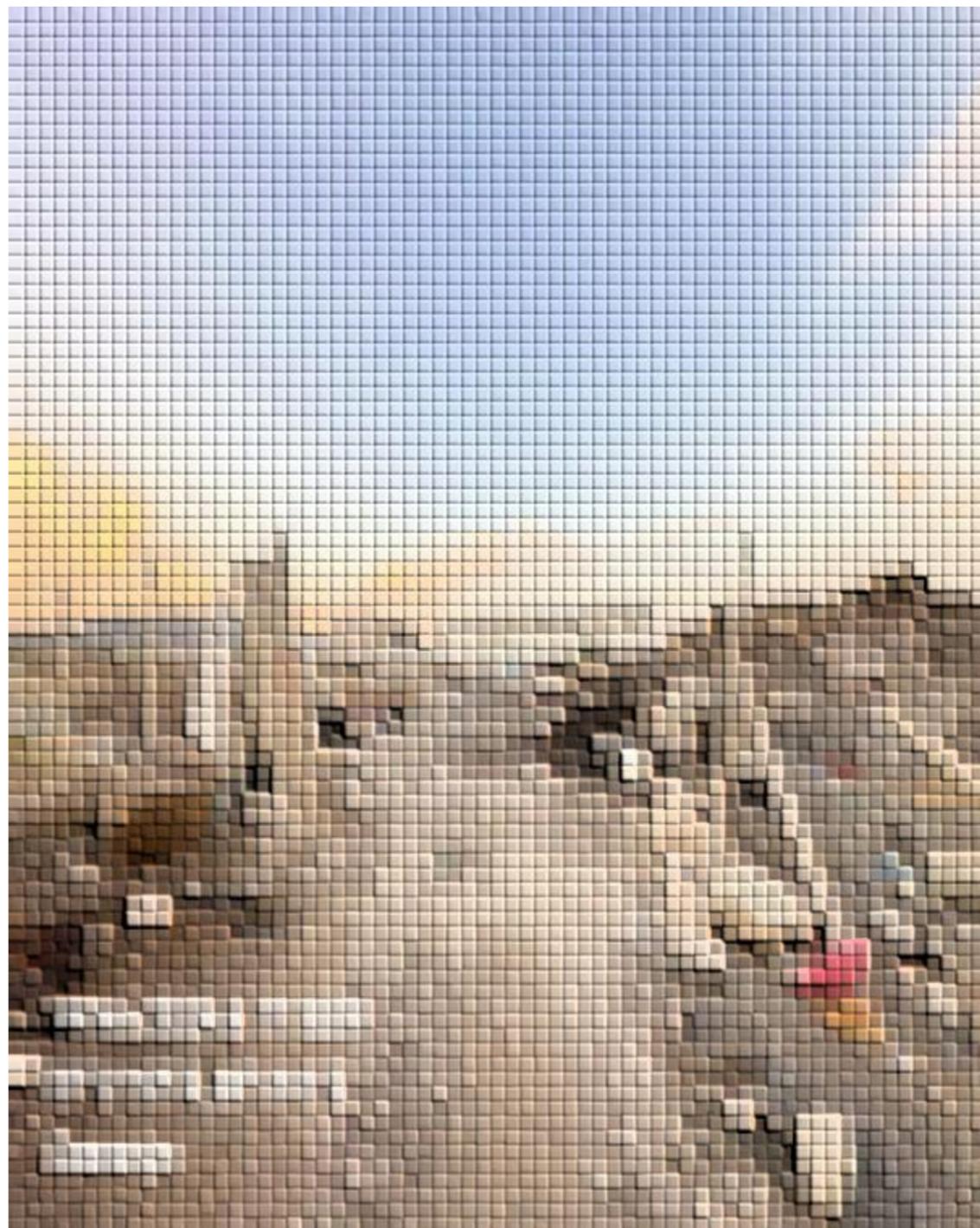


Photos of the delivered materials-3

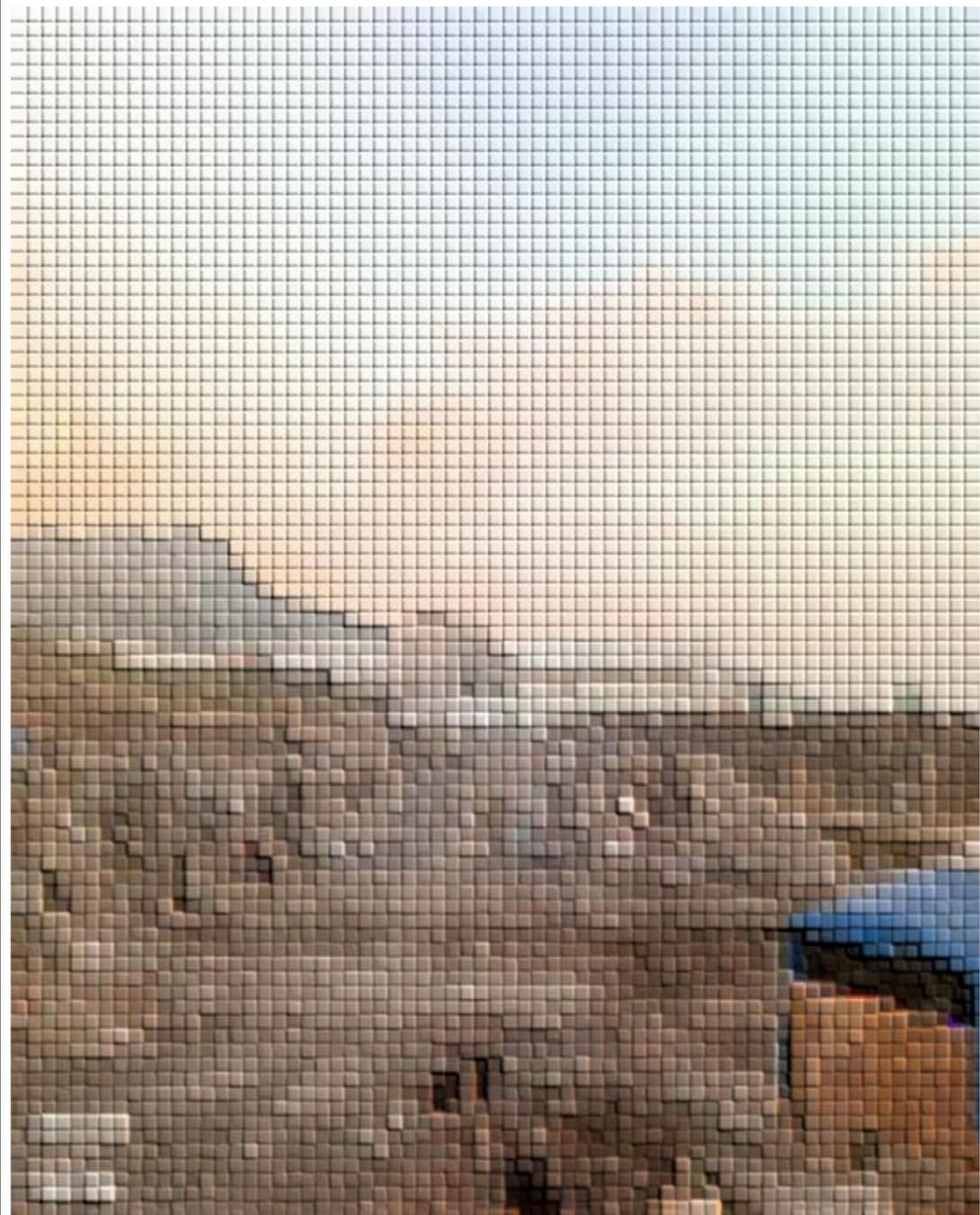


Photos of the delivered materials-4

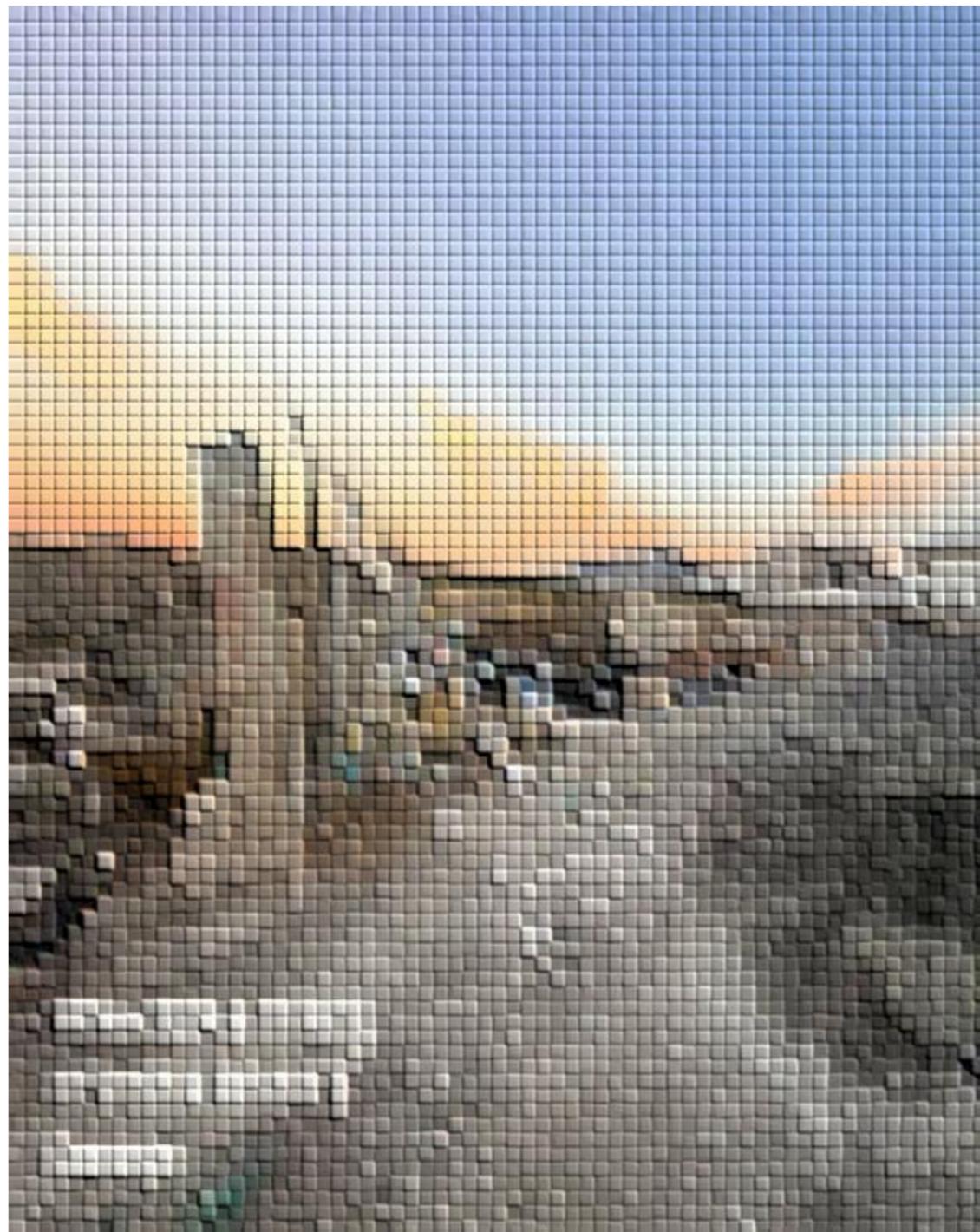
Appendix 7 Area recommended by Project Owner



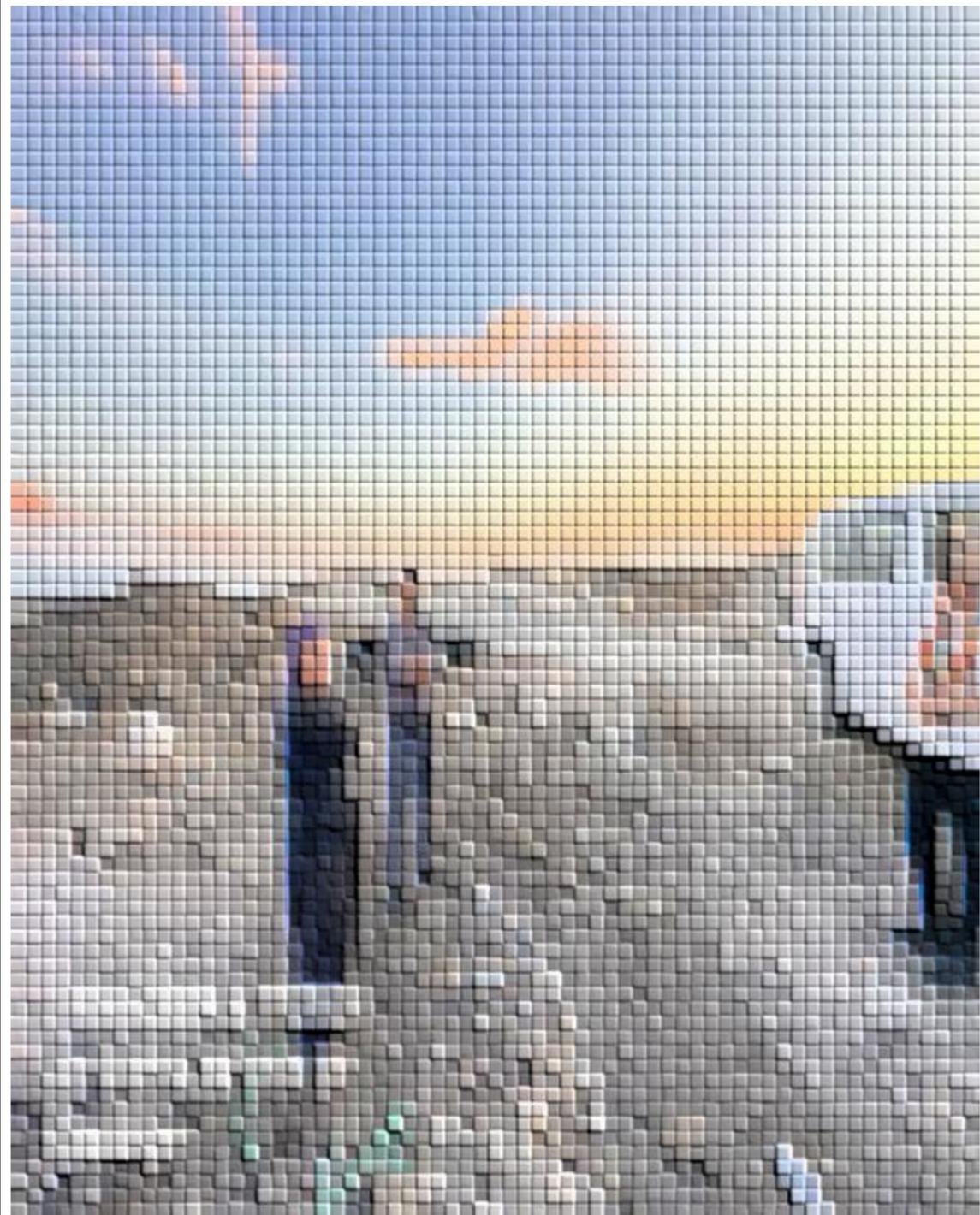
Before the area was arranged-1



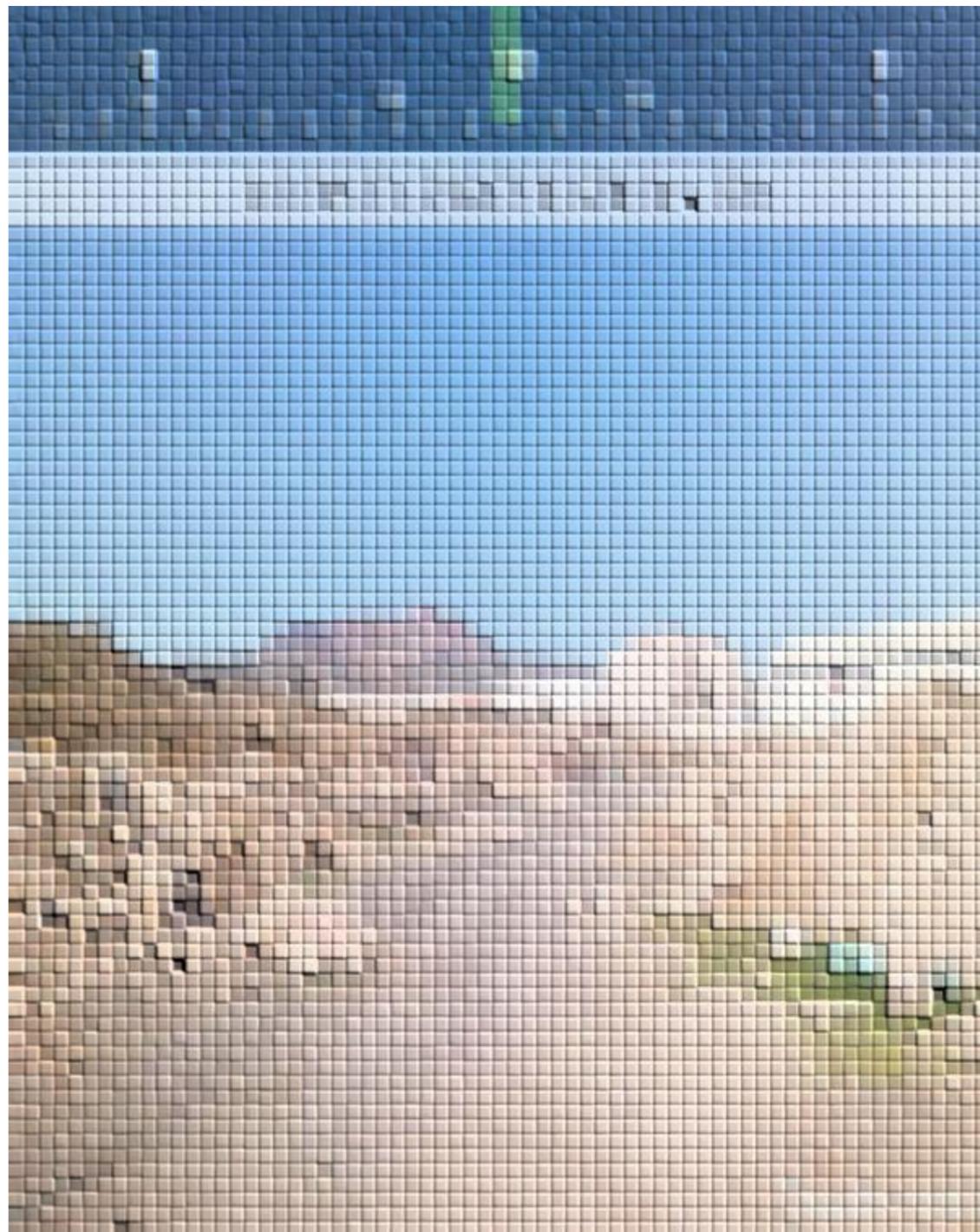
Before the area was arranged-2



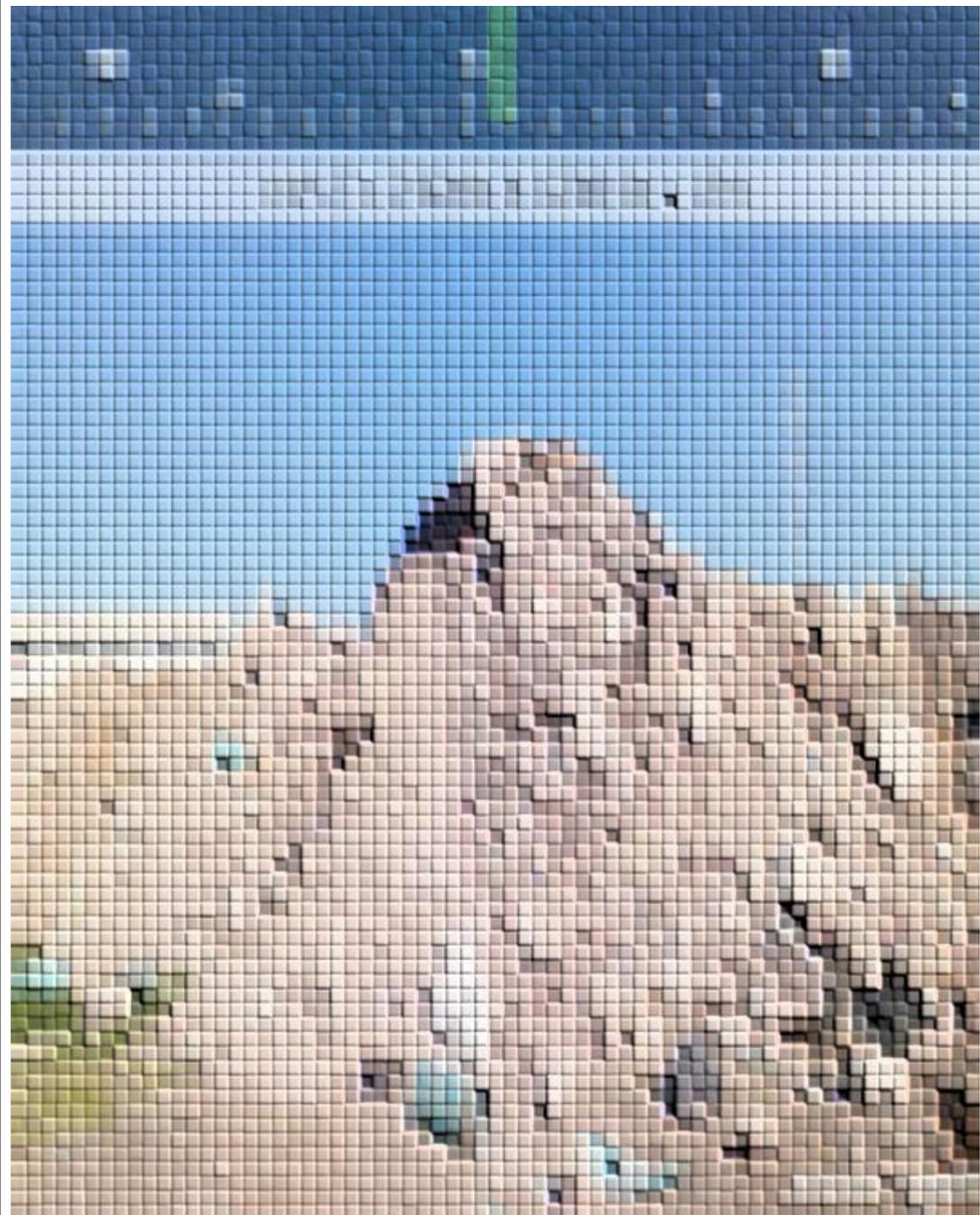
Before the area was arranged-3



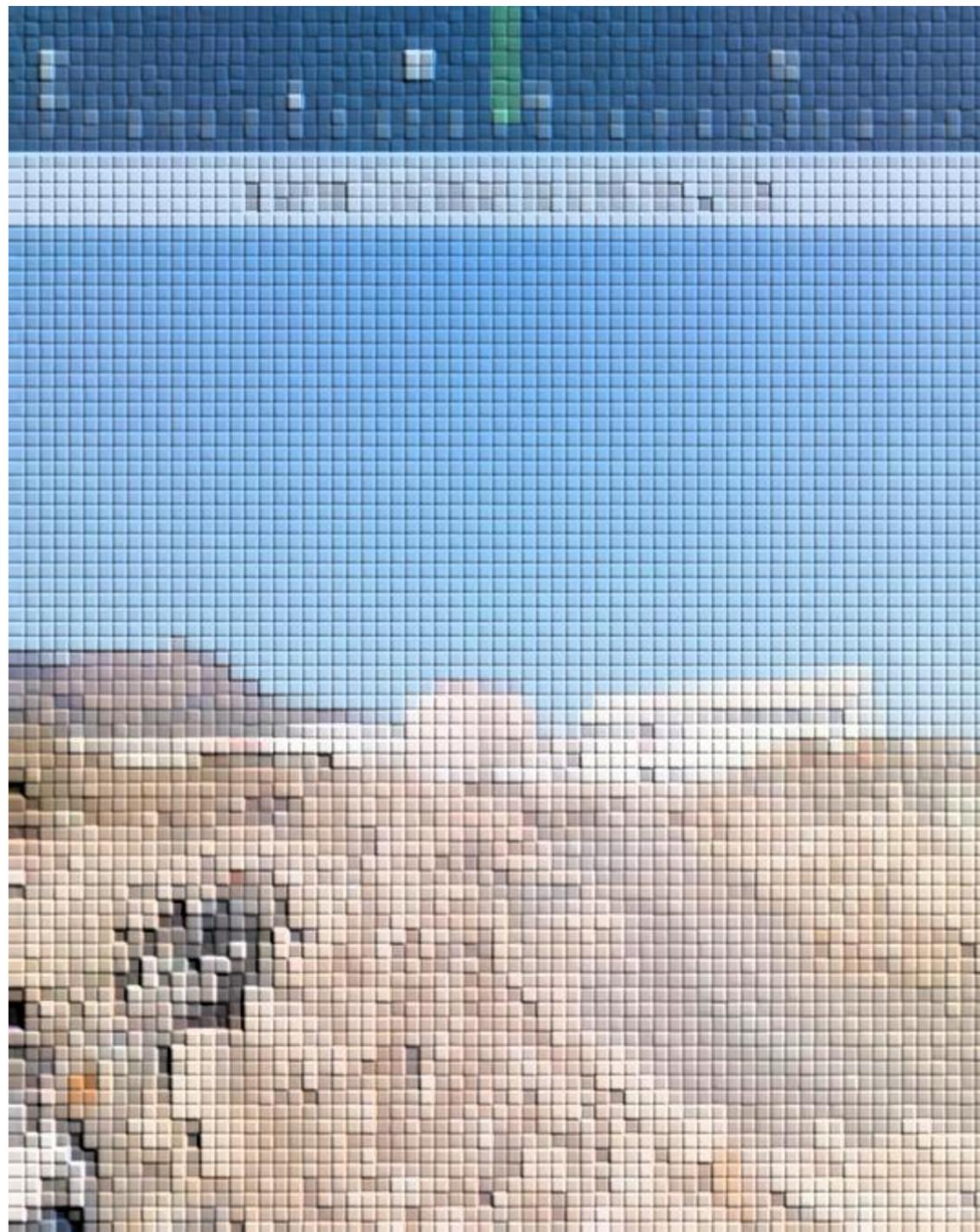
Before the area was arranged-4



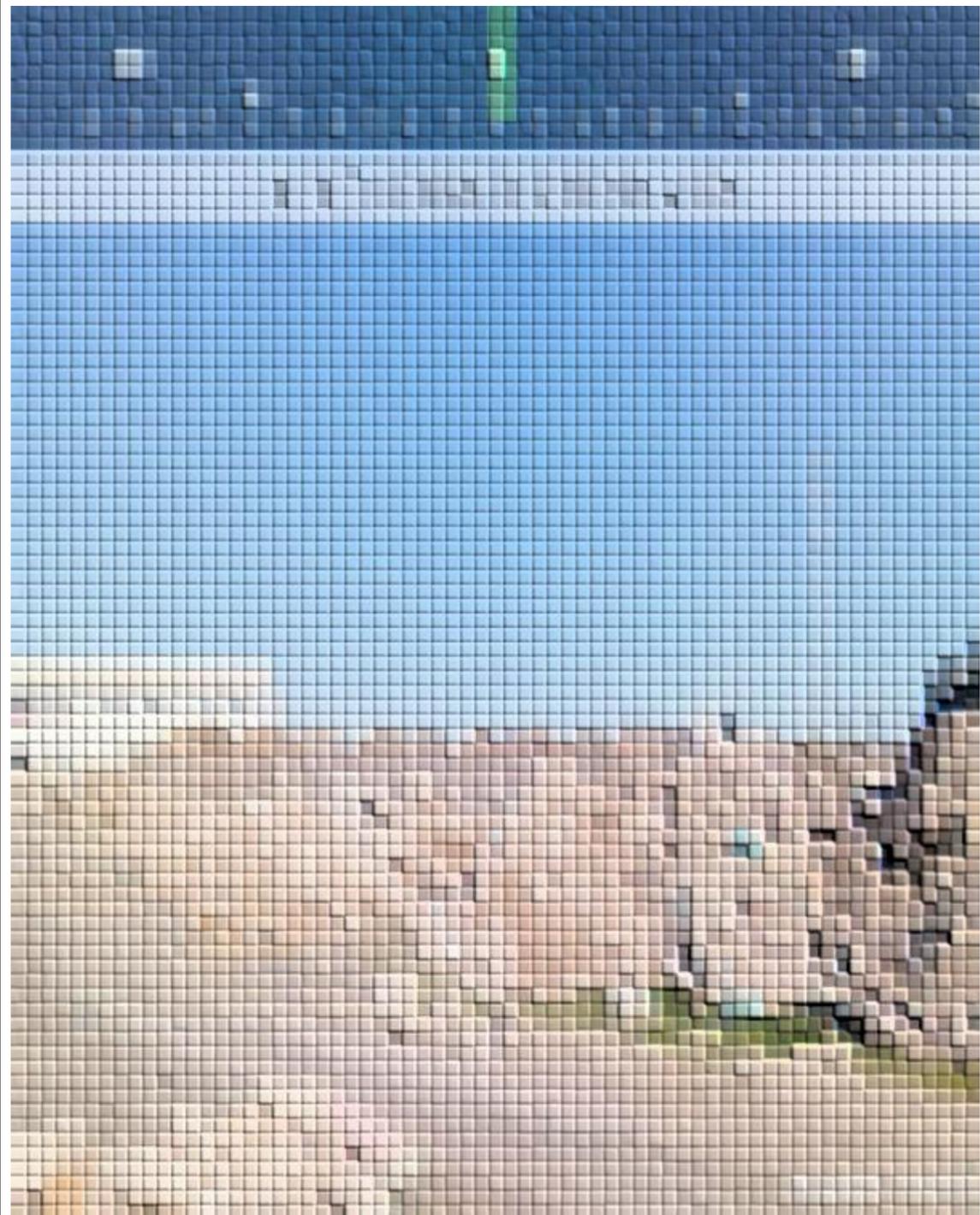
Before the area was arranged-5



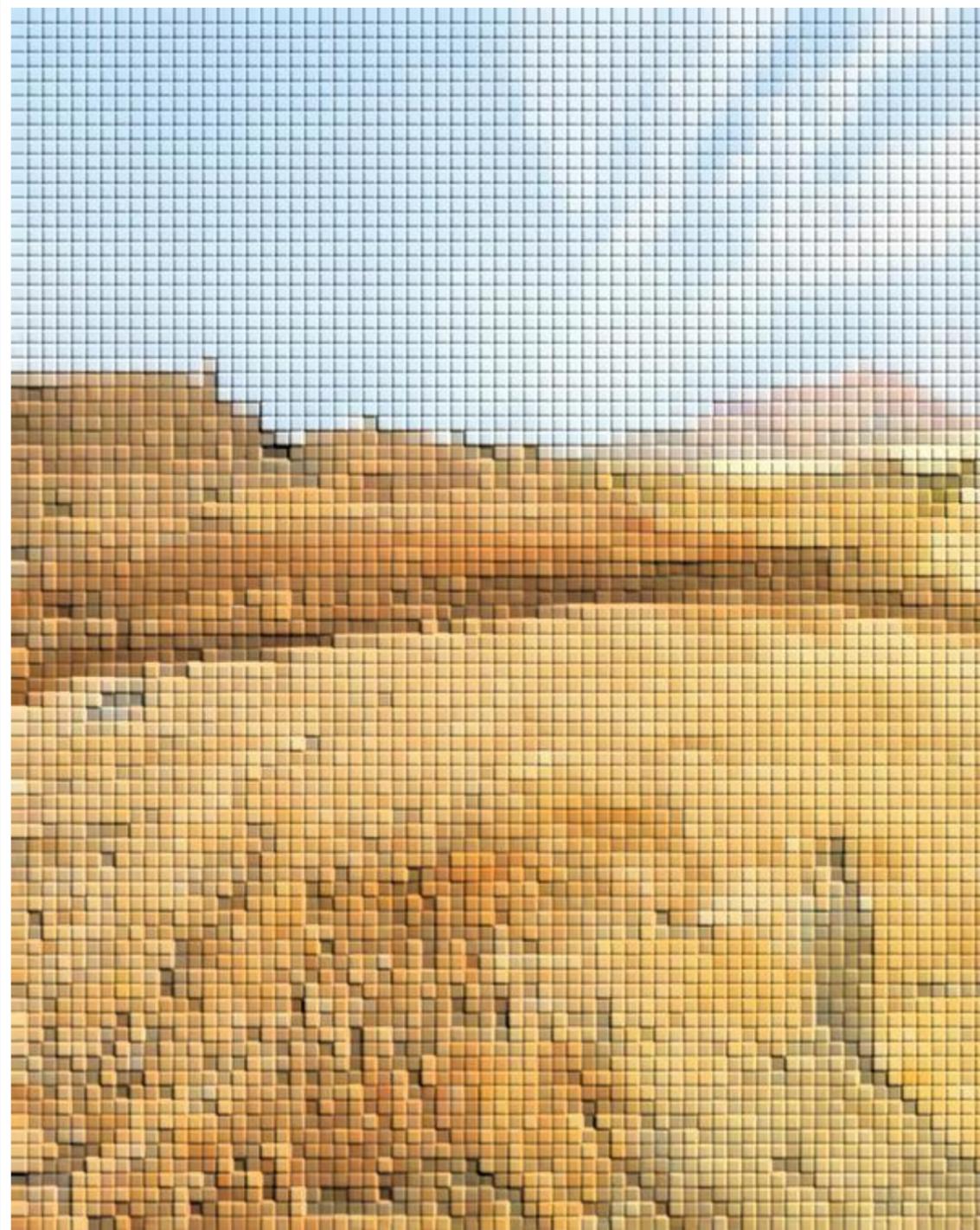
Before the area was arranged-6



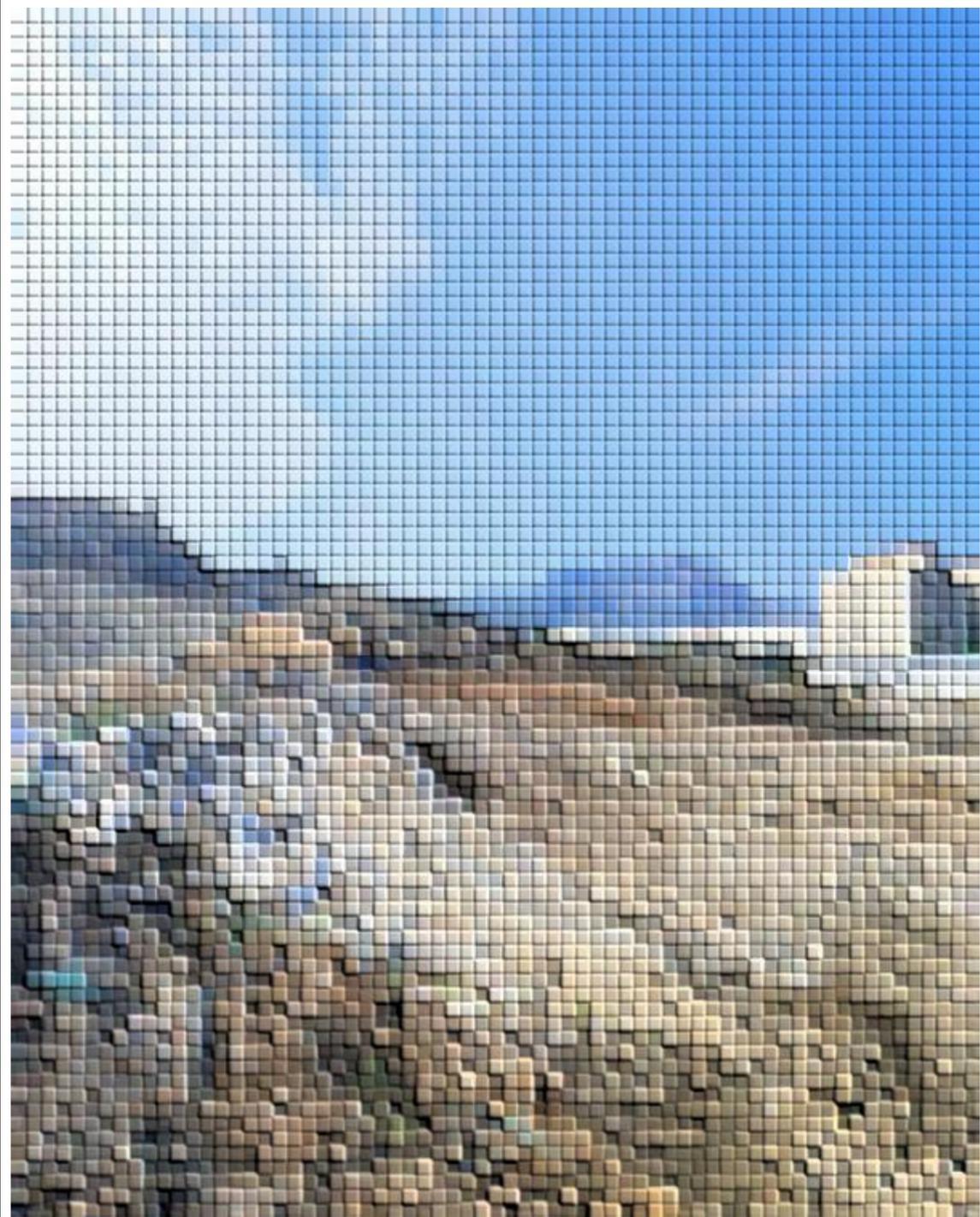
Before the area was arranged-7



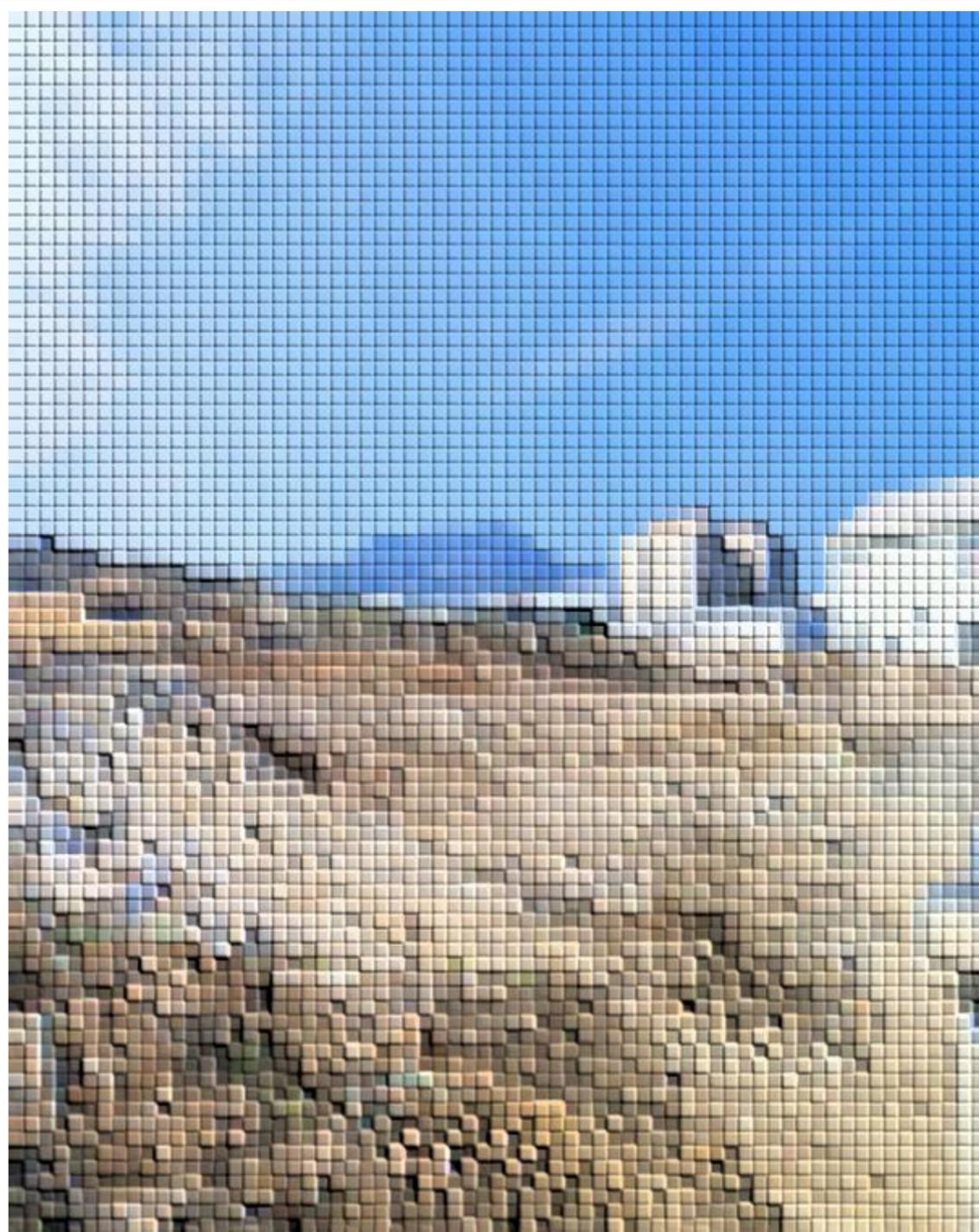
Before the area was arranged-8



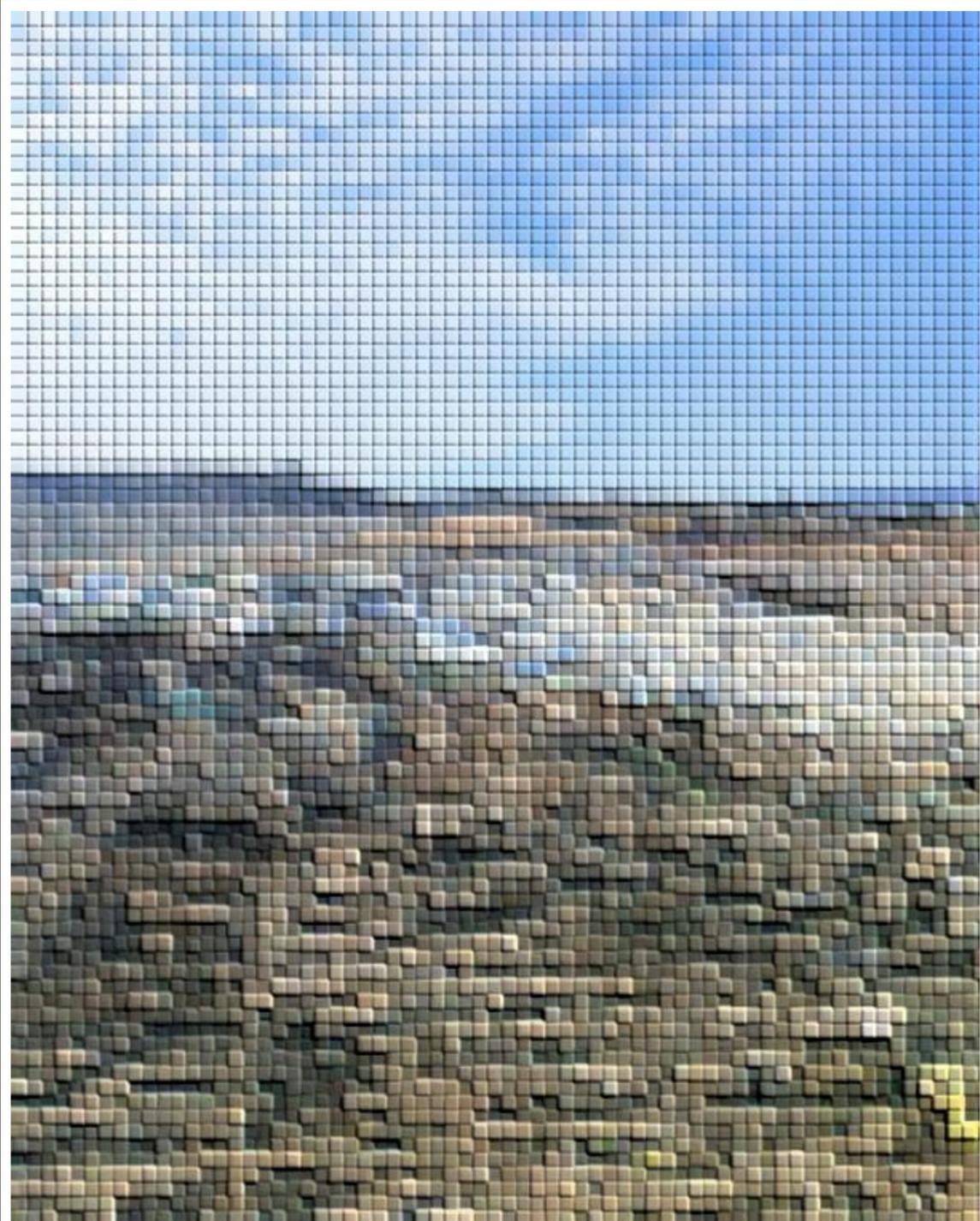
Current condition of the area-1



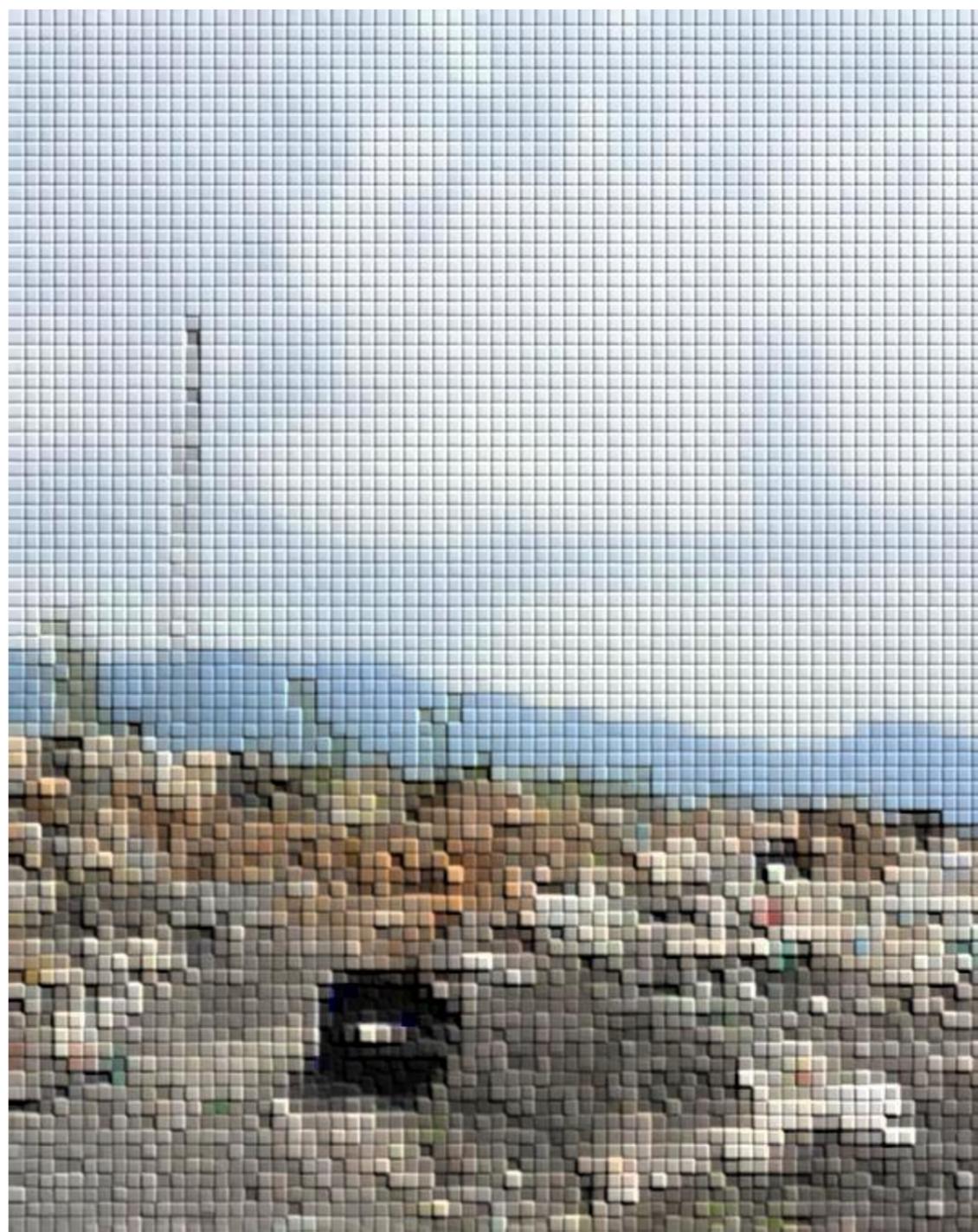
Current condition of the area -2



Current condition of the area-3



Current condition of the area-4



Current condition of the area-5



Current condition of the area-6