



MERSIN INTERNATIONAL PORT (MIP) LIVELIHOOD RESTORATION PLAN



Social
Risk
Management

DOCUMENT CHECK

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Draft v1	20.04.2022	Ece Kılıçözlü Senior Social Expert Gökhan Metin Senior Social Expert Sadık Avcı Stakeholder Engagement Coordinator	Ece Kılıçözlü <i>Project Manager</i> Frederic Giovannetti <i>Sr. Quality Assurance</i>
Final			

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Abbreviations

AFA	Amateur Fishermen’s Association
EBRD	European Bank for Reconstruction and Development
EMH2	Mersin Port Extension Project Phase II
IFC	International Finance Corporation
LRP	Livelihood Restoration Plan
MIP	Mersin International Port
PAPs	Project Affected Persons
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
TCDD	Turkish State Railways

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Executive Summary

Mersin International Port is seeking financing from the European Bank for Reconstruction and Development (the “EBRD”) and the International Finance Corporation (“IFC”), for the East Mediterranean Hub Project 2 (“EMH2” or the “Project”). In 2019, MIP decided to expand the port capacity with additional investment within the scope of EMH2, in order to use the docks inside the port more effectively, to increase port activities, and to service more large-volume ships from the port services of Mersin Port. EMH2 involves additional fill area of 164,490 m² that will be an extension of the existing berth and yard, construction of a new cruise port, shortening of the main breakwater by 100m, and dredging operations to reduce the elevation of the bottom of the harbor and access routes and to provide the depth of the bottom where large draft vessels can safely approach.

The Project follows international environmental and social sustainability standards and requirements of the EBRD and the IFC. The Social Impact Assessment (SIA) prepared for the Project in 2021 highlighted receptors for potential economic displacement. (SIA) revealed that, despite lack of land acquisition, the Project’s construction may lead to restrictions of movement in the Port area, and result in economic displacement for:

- Members of Amateur Fishermen Association by using the Camlibel Fishing Port, located close to MIP facilities, due to higher waves caused by shortening of breakwater
- Tour Boats and Restaurant Boats which operate inside the Port Area due to potential changes in their route and limitations to their operations caused by Project’s dredging and filling activities
- Businesses operating in Ataturk Park, located in the immediate vicinity of MIP due to construction noise and construction visual impact which may lead to decrease in Ataturk Park’s visitors

In line with SIA findings, SRM was given by MIP the mandate to prepare the Livelihood Restoration Plan (LRP) for the EMH2. This LRP follows EBRD’s Environmental and Social Policy 2019, and IFC Sustainability Framework to assess project’s potential economic displacement impacts, identify Project Affected Persons (PAPs) and businesses, develop mitigation measures, present an entitlement matrix, establish a monitoring and evaluation mechanism, ensure stakeholder consultations and project specific grievance mechanism is place.

The methodology for LRP, included document review, scoping, field work, impact assessment and LRP report writing. The first phase for preparation of the LRP was scoping, which involved desktop review of the Social Impact Assessment (SIA), the Stakeholder Engagement Plan (SEP), the Non-Technical Summary (NTS) and a two-day field visit and preliminary consultations with MIP and local stakeholders. The second field study included consultations, and surveys with identified businesses to understand Project’s impact on livelihoods. Overall, 49 PAPs from 27 different institutional stakeholders are interviewed. 16 of these stakeholders are directly affected by the Project.

Scoping study confirmed that Atatürk Par tour boats may be impacted by Project’s dredging and construction related impacts. Even though there won’t be any restrictions for accessing Ataturk Park, mobile and stationary vendors were also scoped in the LRP field as they may be impacted from construction noise and visual impact. Scoping study revealed that in addition to already identified impacted groups, there are agency boats that operate from MIP that will be relocated during construction works. Therefore, agency boats were included in the scope of LRP field studies. Restaurant boats were scoped out because they are anchoring inside Camlibel port and do not leave the harbour.

During scoping field study, consultations were held with Members of Amateur Fishermen Association (AFA) who use the Camlibel Fishing Port, to understand the impact of breakwater shortening on their livelihoods. Upon the completion of SIA studies, MIP had approached AFA and suggested reconstruction of AFA’s own breakwater, which was highly damaged in a storm in 2018. AFA confirmed that reconstruction of their breakwater would solve their grievances, and there are no additional mitigation measures needed. Hence, AFA was scoped out of LRP studies, and close stakeholder engagement with them and regular follow up on the status of Camlibel Water Sports Center is advised in the entitlement matrix of this LRP.

Project's construction phase activities include the extension of existing berth and yard, construction of new cruise terminal, shortening of main breakwater, and dredging to increase channel depth to allow larger vessels to access the port area. Each Project activity's impact differ according to PAP category. Project's expansion and additional fill areas has direct impact on agency boats, since they will be resettled during Project's construction phase. Other Project impacts assessed during LRP are vendors in Ataturk Park that may lose customers due to construction noise and visual impact, and tour boat operators that operate out of Ataturk Park that may face limitations to route. Key impacts and mitigations on Project affected businesses are below:

- Agency boats which operate in the port are managed as a company and a cooperative on behalf of the owners of these boats. They have been operating since 1980. They established the Cooperative in 1992 and became a company in 2014. The Cooperative has seven members, each representing a company. Agency boats will have to relocate during construction phase of the Project. Port Authority is responsible from allocation of place. Agency boats have to operate out of a customed port. If they are to be relocated to a non-customed area, they will have to first visit customs and then service their customers. This alternative would significantly increase the costs for agency boats due to additional mileage. Therefore, their relocation alternative is critical to understand the magnitude of impact. MIP took immediate action and organized a meeting with the agency boats representatives on 3rd March 2022. According to the decisions made in the meeting, agency boats will be operating in the customed area in the port during the Project construction. MIP will provide location in the western side of the to-be-build EMH2 berth. **The new location in the MIP area will not increase the costs of agency boats. On the contrary, it will be more beneficial than the current location.** However, Port Authority needs to confirm this new location. If this location is confirmed by Port Authority, then MIP will continue engagement and information sessions with agency boats through SEP. If the Port Authority shows an area outside the Port, MIP will compensate for the additional costs agency boats may incur. This will be monitored by LRP.
- There are 6 tour boats that operate out of Ataturk Park. Tour boats operate every month of the year. Most work takes place on weekends and during the summer months. The tour lasts half an hour, customers may purchase drinks and food while on the tour. Tour boats have legal license to operate as tour boats. However, they have no specific legal permission to use Ataturk Park as departure location. Main issues and concerns raised by the tour boat operators are changes to their route due to dredging and increased traffic, and changes to their passenger pick up location due to Project's extension. Tour boat operators voiced their concern over increased traffic in port which may limit the number of their daily tours. Priority is given to larger vessels for security reasons, and tour boat operators have to abide by Port rules. MIP strongly emphasizes that there will be no increase in port traffic during the construction. On the contrary, a decrease in number of the ships is expected due to construction in the port. The construction is within existing MIP borders and there will not be any interference with their departure locations. As for the operation period, MIP states that coming of larger ships will not impact tour numbers in a day. Larger ships use the port currently and tour boats arrange their tour period accordingly. There will be no change in the current route. This is also confirmed by Port Authority. Tour boats' departure location and routes will not change due to the Project; and the traffic is managed by Port Authority. MIP will engage with tour boat operators and train them on port safety and traffic.
- There are 19 stationary vendors in Ataturk Park. Four stationary vendors that are located closest to MIP and the owner of the only café in Ataturk Park were interviewed during the field visit. The stationary vendors have been located in their current locations in the park by the Municipality. It was learned that they work in the same location every day because they are not allowed to move their peddler stall. This means that there is no alternative place for them to carry on their businesses in case of a livelihood impact in the park. However, all of the consulted vendors stated that there were working in the park during the previous extension of the berth in 2015-2016, and they were not affected by the construction. Both the vendors and the café owner stated that they do not expect an impact on their livelihood or on the number of the visitor of the park due to the current Project. However, before

construction a baseline recording including confirmed numbers, general activities, day/night and weekday/weekend customers/visitors in the park will be conducted. These will be monitored regularly as identified in monitoring and evaluation part of this plan.

The LRP has devised an entitlement matrix that identifies impacted groups and presents entitlements. The entitlements are based on the principles of LRP which are:

- MIP ensures that construction works will not block access to or impose any restrictions on Atatürk Park during construction period and operation period as it is not under MIP's discretion to practice any action in the park. On the other hand MIP assures that during Construction and Operation the activities will not interfere with Atatürk Park.
- MIP is willing to contribute to finding a new location that can be used by the custom boats, which is subject to custom approval. MIP agrees to allocate a new location to agency boats, once this location is approved by Port Authority and Customs. If the new location is not within Port boundaries, MIP agrees to compensate for any additional costs (fuel, custom entry/exit) in line with entitlements presented in the entitlement matrix.
- MIP will regularly inform the PAPs in the LRP regarding the project activities and record these activities.
- Project's impact on businesses (tour boats/vendors) will be monitored and reported regularly
- All PAPs will be informed about grievance mechanism
- Although not directly related to the Project, MIP agrees to rebuild the breakwater (which collapsed partly due to heavy storms and waves in the past years) of Amateur Fishermen's Association and pay for the cost of reconstructing the breakwater if the necessary legal permits are obtained by Amateur Fishermen's Association and the relevant institutions and there are no legal obstacles to start the construction. However, as this is dependent on external party approvals, MIP will continue to monitor impacts through regular and reported meetings with AFA and record these as well as discussing alternative measures support AFA prevent impacts of the collapsed breakwater.
- In order to mitigate potential adverse traffic related cumulative impacts, MIP will compensate by covering the construction costs of the Gates Project. Gates Project will be managed by Provincial Governor. MIP will report the progress with this project to the Lenders regularly.

Stakeholder consultations for the Project's information sharing started with EIA. The Project's EIA meeting with the public was conducted on 12 July 2018 and positive decision for the EIA report was received on 17 April 2020. On 12 June 2020, the Mersin Metropolitan Municipality filed a lawsuit (along with the Stay of Execution Demand for the transaction subject to the lawsuit) against the Ministry of Environment and Urbanization (the for the Cancellation of the Transaction and Execution of the 1/5000 scale Additional Revision Master Plan as well as 1/1000 Scale Additional and Revisional Implementation Plan which were prepared for the capacity increase of Mersin Port and approved by the Ministry. Over the past two years, there has been four petitions with two on-site examinations with expert opinion. Final decision is still awaited.

MIP conducted 40 meetings with 33 stakeholders between February 2021-January 2021; disclosure brochures on EMH 2 Project were distributed 4 mukhtars of Üç Ocak, Cami Şerif, Kültür and Yenimahalle Neighbourhoods on September 9th, 2021. In addition to the stakeholder engagement initiated by MIP, many stakeholder interviews have been conducted within the scope of Social Impact Assessment, supplementary studies and LRP. MIP will disclose Project's Non-Technical Summary, SEP and LRP at its website. The Project has an active grievance mechanism that uses an array of channels (website, whatsapp, phone line, boxes etc) and allows anonymous complaints.

MIP is responsible for implementation of this LRP. LRP will be monitored internally and externally.

1. Introduction

Mersin International Port is seeking financing from the European Bank for Reconstruction and Development (the “EBRD”) and the International Finance Corporation (“IFC”), for the East Mediterranean Hub Project 2 (“EMH2” or the “Project”). The Project follows international environmental and social sustainability standards and requirements of the EBRD and the IFC. The Social Impact Assessment (SIA) prepared for the Project in 2021 highlighted receptors for potential economic displacement. The SIA revealed that, despite no land acquisition being required, the Project’s construction may lead to restrictions of movement in the Port area, and result in economic displacement for:

- Members of Amateur Fishermen Association that currently use the Camlibel Fishing Port, located extreme West of MIP facilities;
- Tour Boats and Restaurant Boats which operate inside the Port Area;
- Businesses operating in Ataturk Park, also located in the immediate vicinity of MIP.

In line with SIA findings, SRM was given by MIP the mandate to prepare the Livelihood Restoration Plan (LRP) for the EMH2. This LRP follows EBRD’s Environmental and Social Policy (2019) and IFC’s Sustainability Framework (2012) to assess Project potential economic displacement impacts, identify Project Affected Persons (PAPs) and businesses, develop mitigation measures, present an entitlement matrix, establish a monitoring and evaluation mechanism, ensure stakeholder consultations and the establishment of a project specific grievance mechanism.

1.1. Objectives of the LRP

The Livelihood Restoration Plan (LRP) objectives are to:

- Avoid and minimise potential economic displacement impacts;
- Identify and confirm economic displacement impacts and associated PAPs, and characterise their baseline socio-economic circumstances;
- Determine the extent of potential impacts on livelihoods and provide compensation for loss of assets at replacement cost where warranted by impacts, and/or provide livelihood restoration measures;
- Prepare an entitlement matrix that accommodates both local legislation and Lender’s Requirements;
- Ensure mitigations are developed according to constant consultations with key stakeholders, including affected people and specific groups therein, particularly vulnerable people and women;
- Establish knowledge of, and access to the project’s external grievance mechanism;
- Define a monitoring and evaluation mechanism.

1.2. Structure of the LRP

Contents of this LRP, including this Chapter, cover the following:

- Chapter 1: Introduction
- Chapter 2: Project Description
- Chapter 3: Methodology
- Chapter 4: Project Potential Impacts
- Chapter 5: Institutional and Legal Framework
- Chapter 6: Livelihood Restoration and Compensation
- Chapter 7: Stakeholder Consultations and Disclosure of Information
- Chapter 8: Grievance Management and Redress System
- Chapter 9: Monitoring and Reporting
- Chapter 10: Roles and Responsibilities
- Chapter 11: Implementation Costs and Business Plan

2. Project Description

2.1. Project Background and Project Location

Mersin International Port (MIP) was established in the 1950s by Turkish State Railways (TCDD) and rented in 2007 for 36 years to MIP, a joint company initially established by Akfen Holding and PSA International. In 2017, the Australian Infrastructure Fund IFM joined as a shareholder. The land on which MIP is established is owned by TCDD and the Treasury. Having acquired the right to operate the port, MIP has made investments to improve its capacity to provide services in land and marine areas.

The current shareholder structure is as follows:

- 51% - PSA International
- 39% - IFM Investors
- 10% - Akfen Holding

In 2019, MIP decided to expand the port capacity with additional investment within the scope of Mersin Port Extension Project Phase II (EMH2), in order to use the docks inside the port more effectively, to increase port activities, and to service more large-volume ships from the port services of Mersin Port. Mersin International Cruise and Container Port is reported to have the potential to be the most important port to meet the demands of international logistics companies in the Eastern Mediterranean region. Mersin Port will increase its service capacity in the Eastern Mediterranean and will make a significant contribution to the increase in Turkey's maritime trade.

Mersin International Port is regarded as one of the leading ports not only in Turkey but also in the Eastern Mediterranean, due to its geographical location, capacity, wide hinterland as well as the advantages provided by the convenience of multi-mode connection to domestic and international ports. Mersin Port has 21 docks over a total port area of 112 hectares. It can provide loading and unloading services to nearly 30 ships at the same time depending on their sizes.



Figure 2-1: Project Location and Activities

EMH2 involves activities grouped under four main headings¹:

I. Additional Fill Area:

The additional fill area will be an extension of the existing berth and yard. It is an area of approximately 164,490 m². It is planned to fill the front and west of the dock no. 1, in front of the docks no. 2 and no. 3, and the area in front of the previously filled area of 27,912 m².

II. New Cruise Port Fill Area

Mersin Port will lose the ability to accommodate cruise ships due to the new additional filling area. For this reason, a new cruise port will be constructed by filling an area of 11,845 m² right next to the existing cruise port (80 m to the west). The total of this area with the filling area mentioned above is 176,335 m². In other words, **a total area of 176,335 m² will be filled in the project.**

III. Shortening of the main breakwater by 100 m

The main breakwater was shortened by 100 m in 2020 so that ships can dock and maneuver easily.

IV. Dredging Operations

The purpose of the dredging is to deepen the harbor and access routes, which have filled in due to sedimentation and organic sediments in the sea, and to provide the depth required for large draft vessels. Within the scope of the project, a total of 3,297,000 m³ dredging in a total area of 2,094,705 m².

MIP has also launched Kapi Project (Gate) in Mersin in parallel to EMH2. The Gate project is a multistakeholder project to resolve traffic impact of port operations. "Kapi Projesi - Gate Project" will be implemented concurrently with the extension project. With this project, the port traffic will be separated from the city traffic

¹ Non-technical Summary

and the waiting times for the trucks will be shortened. For the project, MIP cooperates with other project stakeholders (Mersin Governorship, TCDD, General Directorate of Highways, State Hydraulic Works, Mersin Metropolitan Municipality, Akdeniz Municipality, Naval Forces Command, National Real Estate, Veterinary Medicine, Coast Guard, and other stakeholders).

Project Location

The EMH2 Project is located in the Akdeniz district of Mersin Province. Currently, there is an operating port in the Project Area.

Atatürk Park and Congress Hall, commercial areas and Mersin Marina are located to the west of the Project Area; there are other berthing areas related to Mersin Port in the east of the Project; Akdeniz District Center, residential areas, and state institutions in the north and the Mediterranean Sea in the south. In the east of the Project area, there is a free zone, a fuel terminal and a park. There is also a fishing port in the port and a military port nearby.

2.2. Project's Land Use

There is no land acquisition in the project. The impacted land for expanded operation is owned by TCDD and the Treasury. MIP acquired the right to operate the port, MIP has made investments to improve the capacity of the port to provide services in land and marine areas given the areas defined in the contract by TCDD and MIP which comprises the current operation area on the land and sea. While MIP expanded the port capacity after privatization, they have operated within the limits of the permitted land. For the Project an additional 164,490 m² will be filled. Mersin Port will lose the ability to accommodate cruise ships feature due to the new additional filling area. For this reason, a new cruise port will be constructed by filling an area of 11,845 m². In other words, a total area of 176,335 m² will be filled in the project (164,490 m² + 11,845 m²). All these operations will take place within the current borders of the MIP. There will not be any land acquisition by expropriation. Project is neither being developed on private land, nor will forest land be used. No land use and asset acquisition impact is foreseen during construction and operation periods. The Project will not limit or restrict access to neighbouring facilities, including Ataturk Park.



Figure 2-2: Project Area Potential Impacts

3. Methodology and Scoping

3.1. Methodology

The methodology for LRP preparation included document review, scoping, field work, impact assessment and LRP preparation. The first phase for preparation of the LRP was scoping, which involved desktop review of the Social Impact Assessment (SIA), the Stakeholder Engagement Plan (SEP), the Non-Technical Summary (NTS) and a two-day field visit and preliminary consultations with MIP and local stakeholders. The aim of the scoping report was to identify key impact areas, scope in PAPs and business that may be prone to economic displacement or any livelihood related impact, and scope out impacts that do not require any additional mitigations. Scoping report also presented methodology for LRP field work. The final version of the “Scoping Report for Mersin International Port (MIP) Livelihood Restoration Plan” was submitted on 31 January 2022 and accepted by IFC and EBRD. The scoping report included methodology for LRP field study with questions/surveys targeted to each identified impacted stakeholder. In-depth interview guideline questions are presented in Annex 12.4.

Upon completion of scoping, LRP field work was carried out between February 1-4, 2022 by 4 consultants from SRM Consulting. The LRP field work focused on consultations with identified PAPs, businesses and one-on-one meetings with key stakeholders. The field work started with a face-to face meeting with MIP team; and upon completion of field studies, an online closing meeting was conducted to reflect the field findings. Qualitative and quantitative data gathered during field study was used to develop a livelihood impact assessment. Impact assessment was based on the impact type (temporary/permanent), impact period (construction/operation), and possibility of occurrence of identified livelihood impact. Chapter 4 presents the results of project’s impacts on PAPs livelihoods.

During LRP field study, all stakeholder groups targeted for impact assessment were consulted. The number of businesses included in the scope and the number of businesses consulted are given below. Photos taken during the consultations and interviews are presented in the Annex 12.5.

Table 3-1. Number of Directly Impacted Businesses Interviewed

No	Stakeholder Group	Number of Businesses	Number of Targeted Stakeholders Interviewed	Related Photo in the Annex 12.5
1	Businesses in Ataturk Park (Permanent)	1	1	Photo 8
2	Businesses in Ataturk Park (Mobile Vendors)	19	4*	Photo 11, 18
3	Tour boats that operate out of Ataturk Park	6	4	Photo 5, 6, 7, 9, 10
4	Third party boats, agency boats at the berth	7	7**	Photo 3, 4, 12
*In Ataturk Park, mobile vendors located closest to the MIP Port were interviewed. There were only 4 mobile vendors that could be prone to economic displacement, the other vendors are not expected to be impacted from construction related activities.				
** Agency boats operate under the umbrella of a single cooperative and company. The number of members is 7 and all of them were interviewed. The information on number of members was taken into consideration.				

3.2. Summary of Scoping Report

The scoping report identified issues that are scoped in for LRP studies, and described the methodology to be used for LRP.

The scoping field work took place on December 21-22, 2022. The aim of the scoping field work was:

- to visit the port area to assess baseline conditions
- to discuss the impacts of the previous expansion projects on livelihoods
- to understand Project potential impacts on Project Affected Persons (PAPs) livelihoods,
- to discuss potential Project livelihood impacts with key stakeholders
- to identify potential PAPs.

As a result of the scoping report, the parties that are likely to experience livelihood impacts were identified. The summary table below presents the findings of the scoping report.

The potential impacts and the actions to be taken which are given in the table below are the findings of the Scoping Report. Findings and corrective actions based on the LRP field work are evaluated in detail in Section 4.

Table 3-2. Summary of Scoping Report

Category of Affected Persons	Potential Impact of Project Component	Scoped in/Out for LRP	Reason	Actions to be taken
Tour boats that operate out of Ataturk Park	Restrictions on movement of boats in and out of the port due to dredging Loss of customers due to Project's construction impacts (noise, dredging impacts)	In	These tour boats cruise within the greater Port boundaries. The tour boats are not allowed to operate within the operations of MIP and they are already restricted to west coast. Should there be restrictions to tour boats, mitigations will be developed to avoid any economic displacement during EMH2 construction.	Map out exact route of the tour boats Gather socio-economic baseline data per boat Discuss mitigation measures with Mersin Port Authority
Businesses in Ataturk Park (permanent and mobile vendors)	Construction impacts such as noise, water turbidity due to dredging that may lead to decrease in park visitors	In	The Project will not impose restrictions on entry or exit to the park. However, magnitude of impact will be assessed further at LRP field work.	Congress hall will be visited, and discussions will be held with Metropolitan Municipality on management of the congress hall. Permanent vendors (if open) will be visited, and information on their incomes will be obtained. Mobile vendors are will be assessed.
Third party boats, agency boats at the berth	Berth expansion may lead to their displacement during construction and may be during operation	In	Project's berth expansion will displace the existing services provided by third party boats. This issue will be explored in LRP further.	Identification of third-party boats and companies that provide services

			Description of impact and mitigation strategy
Amateur Fishermen's Association	Shortening of the main breakwater by 100 m leading to increased waves and potential damage to boats in Camlibel Port	Out	Construction of Camlibel Port or repairworks of AFA's seawall will mitigate potential increased wave damage pending approval from municipality
	Dredging: Restrictions on movement for boats in the Camlibel port	Out	Mersin Port Authority did not envision any changes to route followed by Camlibel Port users during dredging. They will continue to organize and monitor port entry and exit to ensure all operations continue as is.
			Monitoring of seawall construction Monitoring of impacts on fishermen boats Monitoring of boat movements during construction and intervention should there be restrictions to port entry and exit to Camlibel port users. Safety hazards to smaller boats due to increased traffic will be discussed with Port Authority
Restaurant boats in Camlibel Port	Shortening of the main breakwater by 100 m leading to increased waves and potential damages to boats in Camlibel Ports.	Out	Construction of Camlibel Port or reconstruction of AFA's breakwater will mitigate potential increased wave damage
			Monitoring of breakwater construction

These restaurant boats are stationary.

3.3. Stakeholders Consulted

Within the scope of the study, 49 PAPs from 27 different institutional stakeholders were interviewed. 16 of these stakeholders are directly affected by the Project and their livelihoods are likely to be affected.

Interviews were held with mukhtars of Kültür and Çankaya Neighborhood where Atatürk Park is located, the Metropolitan Municipality, Akdeniz Municipality, public institutions, and NGOs including Union of Chambers of Turkish Engineers and Architects, Chamber of City Planners that oppose the Project. The list of interviewed stakeholders is shown in the table below.

Table 3-3. Stakeholders Consulted

Institution No	Institution	Title	Stakeholder Type
1	MIP	Project Director, Project Manager	MIP Project owner
	MIP ²	Corporate Communications Manager	MIP Project owner
2	Akdeniz Municipality	Deputy Mayor	Municipality
3	Mersin Metropolitan Municipality	Head of Department of Financial Affairs	Metropolitan Municipality
		Atatürk Park Maintenance and Repair Specialist	Metropolitan Municipality
		Assistant Secretary General	Metropolitan Municipality
		Assistant Secretary General	Metropolitan Municipality
4	Mersin Port Authority ³	Port Director	Public Institution
5	Mersin Provincial Directorate of Environment, Urbanization and Climate Change, Department of National Estate	Director of Akdeniz Real Estate Directorate	Public Institution
6	Akdeniz Region Coast Guard Command ⁴	Commander	Public Institution
7	Mersin Cultur and Tourism Provincial Directorate ⁵	Director	Public Institution
8	Mersin Governorship	Governor	Public Institution
9	Customs Directorate	Boat Personnel	Public Institution
10	Mersin Provincial Agriculture and Forestry Directorate ⁶	Deputy Director	Public Institution
		Director	Public Institution
11	Mersin Veterinary Border Control Directorate	Director	Public Institution
12	TRT Çukurova Directorate	Director	Public Institution
13	Kültür Neighborhood Mukhtar ⁷	Mukhtar	Mukhtar
14	Çankaya Neighborhood Mukhtar	Mukhtar	Mukhtar
15	Çamlıbel Solidarity Association ⁸	Predisent	NGO - Association

² Annex 12.5, Photo 1, 2

³ Annex 12.5, Photo 1

⁴ Annex 12.5, Photo 14

⁵ Annex 12.5, Photo 15

⁶ Annex 12.5, Photo 17

⁷ Annex 12.5, Photo 16

⁸ Annex 12.5, Photo 2

Institution No	Institution	Title	Stakeholder Type
		Member	NGO - Association
16	Union of Chambers of Turkish Engineers and Architects, Chamber of City Planners	Provincial Representative	NGO - Chamber
17	Mersin Chamber of Maritime Commerce	President	NGO - Chamber
		Secretary General	NGO - Chamber
18	Limited Liability Mersin Passenger Transport Cooperative/ Mersin Agency ⁹ Boats Ship Service Management Company	Cooperative President and Company Director	Business – Agency boat
19	Limited Liability Mersin Passenger Transport Cooperative/ Mersin Agency Boats Ship Service Management Company	Cooperative Member and Company Partner	Business – Agency boat
20	Limited Liability Mersin Passenger Transport Cooperative/ Mersin Agency Boats Ship Service Management Company	Cooperative Member and Company Partner	Business – Agency boat
21	Limited Liability Mersin Passenger Transport Cooperative/ Mersin Agency Boats Ship Service Management Company	Cooperative Member and Company Partner	Business – Agency boat
22	Limited Liability Mersin Passenger Transport Cooperative/ Mersin Agency Boats Ship Service Management Company	Cooperative Member and Company Partner	Business – Agency boat
23	Limited Liability Mersin Passenger Transport Cooperative/ Mersin Agency Boats Ship Service Management Company	Cooperative Member and Company Partner	Business – Agency boat
24	Limited Liability Mersin Passenger Transport Cooperative/ Mersin Agency Boats Ship Service Management Company	Cooperative Member and Company Partner	Business – Agency boat
25	Park Cafe ¹⁰	Business Owner	Business – Park
26	Mobile Vendor ¹¹	Mobile Vendor	Business – Mobile Vendor
27	Mobile Vendor ¹²	Mobile Vendor	Business – Mobile Vendor

⁹ Annex 12.5, Photo 12

¹⁰ Annex 12.5, Photo 8

¹¹ Annex 12.5, Photo 11

¹² Annex 12.5, Photo 18

Institution No	Institution	Title	Stakeholder Type
28	Mobile Vendor ¹³	Mobile Vendor	Business – Mobile Vendor
29	Mobile Vendor ¹⁴	Mobile Vendor	Business – Mobile Vendor
30	Captain Adnan VIP Tour Boats	Tour boat owner	Business – Tour boat
31	Troys Tour Boat ¹⁵	Tour boat owner	Business – Tour boat
32	Baba Ahmad Tour Boat	Tour boat owner	Business – Tour boat
33	Seyhan 2 Tour Boat ¹⁶	Tour boat owner	Business – Tour boat
34	Tour Boat Captain	Captain	Business – Tour boat
35	Çamlıbel Amateur Fishermen's Associations	President and co-chairs	NGO
36	Mersin Hotel	General Manager	Business

¹³ Annex 12.5, Photo 18

¹⁴ Annex 12.5, Photo 18

¹⁵ Annex 12.5, Photo 5, 6, 9, 10

¹⁶ Annex 12.5, Photo 5, 7

4. Institutional and Legal Framework

4.1. Institutional Framework

For the EMH2 project to achieve its intended objectives, it shall operate under various National policies, legal and administrative frameworks. These include laws and policies of Turkey, IFC Environmental and Social Performance Standards, and EBRD Environmental and Social Performance Requirements. This report prepared in line with Turkey's national legislative requirements and applicable international standards.

Tablo 4-1. Project Related/Affected Roles and Responsibilities of The Institutions

No ¹⁷	Institution	Project Related/Affected Roles and Responsibilities	Influenced Stakeholders	Project Period
1	AYGM (General Directorate of Infrastructure Investments)	To oversee "Çamlıbel Water Sports and Boat Berthing Area Construction Project Feasibility Study" To ensure that the project is included in the investment program after the feasibility study Organize tenders and supervise construction activities for the work following the completion of legal permits	Çamlıbel Port Users	Construction and operation
2	Mersin Governorship	To ensure the tender of the Doors Project, inter-institutional coordination, and supervision of the contractor who will implement the work. Ensure coordination of project implementation with MIP	Mersin residents, and visitors impacted from cumulative traffic impacts related MIP operations	Construction Period
3	Mersin Metropolitan Municipality	To ensure that Atatürk Park remains open for use Restoration, renovation, maintenance works of the park Cultural Center affiliated to BB, etc. in the park. run the social facilities Allocate space for stationary vendors in the park Ensure the safety of park users	Atatürk Park users and visitors Stationary and mobile vendors	Construction/Operation Periods (C/O)
4	Turkish Coast Guard Command	Ensure the maritime security of the port Inspect the ships and boats entering and leaving the port, and within the port Ensure that ships operating in the port operate in accordance with port regulations	MIP Users Çamlıbel Port Users Agency Boats Tour Boats	C/O

¹⁷ According to the Protocol List

No ¹⁷	Institution	Project Related/Affected Roles and Responsibilities	Influenced Stakeholders	Project Period
5	Port Authority	<p>Evaluate the applications of the agency boats to stay within the customs area, receiving the opinions and evaluations of the relevant institutions</p> <p>To process the Çamlıbel port breakwater application of the Amateur Fishermen's Association, to receive the opinions and evaluations of the relevant institutions</p> <p>Implementing the Port Regulation and making it enforced by the relevant institutions</p> <p>Carrying out the administrative operations of the port</p> <p>To ensure the safety of navigation of the ships or marine vehicles in the port administrative borders and area, to ensure that they act in accordance with the ship berthing and anchoring rules, to provide pilotage and tugboat services</p>	<p>MIP Users</p> <p>Çamlıbel Port Users</p> <p>Agency Boats</p> <p>Tour Boats</p>	C/O
6	Mersin Provincial Directorate of Environment, Urbanization and Climate Change	<p>Give permit for Çamlıbel Water Sports and Boat Berthing Area Construction Project</p> <p>Monitoring and auditing relevant legal permits for Çamlıbel port breakwater</p>	Çamlıbel Port Users	C/O
7	Mersin Customs Directorate	<p>To inspect ships and boats entering and leaving the customs area</p> <p>To evaluate the written application of the agency boats for the place they want to be in the customs area.</p> <p>To approve the area where the agency boats will be in the customs area during the construction and operation periods.</p>	Agency Boats	C/O
8	Ship Traffic Services Center	<p>Organise and plan port and maritime traffic</p> <p>Carry out ship traffic operations</p>	<p>MIP Users</p> <p>Çamlıbel Port Users</p> <p>Agency Boats</p> <p>Tour Boats</p>	C/O

4.2. National Legislation

MIP is committed to implement Regulation on Ports of Turkey, and Mersin Port Regulation. The Regulation on Ports of Turkey is the regulation which ships, boats, and marine vessels bound by in operating within the port. In particular reference is made to Articles 10, 21, 22, 28 and 31.

Article 10 is on ship berthing and mooring rules and subclause addresses the regulation with regards to the notifications related to anchorage and the institution which the notification is made to, with references to “ship traffic services center”, and the Port Authority.

Article 21 subclause 2 addresses the importance of speed within the overall prohibited activities within the port, determines that priority is given to ships and sea vehicles compared to the boats for sports, excursion, and recreational purposes. The priority is on ships entering and exiting the port, tour boats require to abide with the speed limit.

Article 22 subclause 19 identifies the institution which the daily excursion requires to act upon the decisions and restrictions of it.

- Issues related to the mooring, sheltering, and navigating routes of the daily excursion boats are determined by the Port Authority, considering waste collection and other services, and approved by the administration. The port master may impose restrictions on the capacity, entry-exit and usage in case the capacity of mooring and sheltering places is exceeded.

Article 28 determines the types of services provided and service area of agency boats under the customs inspections, permits required for them to operate and the institutions which provide the relevant permits, and the institutions which have the authority to determine the dock of the agency boats. Accordingly, boats are given a Permit for Vessels that will Serve Ships subject to Customs Inspection, which is issued, and the content is determined by the port authority. Service boats that do not obtain a permit from the port authority in accordance with the provisions of this article cannot operate in the port administrative area.

Article 31 subclause 1 determines the rules with regards to the use of safety and communication devices required on ships.

- It is obligatory that the safety and communication devices that are required to be kept in the ships and marine vehicles in the administrative area of the port, as required by the legislation, are turned on and in working condition, and that continuous listening is made. In case of malfunction of the aforementioned devices, the ship's/ship's master/owners shall immediately notify the nearest port authority.

This paragraph is important for tour boats and ships and the importance of the safety and communication devices which is important for not breaking the traffic rules within the port and to ensure safe entry, and manoeuvres of marine vessels.

4.3. IFC Performance Standards

MIP is committed to implementing a Livelihood Restoration Plan in line with IFC's environmental and social performance standards. Central to the standards is the IFC's principle of “do no harm” to people or the environment. Negative impacts should be avoided where possible, and if these impacts are unavoidable, they should be reduced, mitigated or compensated for appropriately. In particular, the IFC is committed to ensuring that the costs of economic development do not fall disproportionately on those who are poor or vulnerable.

The Performance Standards, designed to improve social and environmental outcomes, that are relevant for this Project's LRP consist of the following:

- Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts
- Performance Standard 4: Community Health, Safety and Security
- Performance Standard 5: Land Acquisition and Involuntary Resettlement

The PS 5 refers to the management of physical displacement (i.e. relocation or loss of shelter) and economic displacement (i.e. loss of assets or access to assets that leads to loss of income sources or means of livelihood) as the result of project-related land acquisition.

4.4. EBRD Performance Requirements

MIP is committed to make sure that the Project will comply with the performance requirements (PR) of EBRD Environmental and Social Policy (2019). In particular, reference is made to PR 1, 2, 5 and 10:

PR 1: Assessment and Management of Environmental and Social Risks and Impacts- this PR recognises the importance of an integrated assessment to identify the environmental and social risks and impacts associated with projects and the client's management of environmental and social performance throughout the life of the project.

PR 2: Labour and Working Conditions - this PR recognises that for clients and their business activities, the workforce is a valuable asset, and that good human resources management and a sound worker-management relationship based on respect for workers' rights, including freedom of association and right to collective bargaining, are key ingredients to the sustainability of business activities.

PR5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement: This PR addresses impacts of project-related land acquisition, including restrictions on land use and access to assets and natural resources, which may cause physical displacement (relocation, loss of land or shelter), and/or economic displacement (loss of land, assets or restrictions on land use, assets and natural resources leading to loss of income sources or other means of livelihood).

PR10: Information Disclosure and Stakeholder Engagement – This PR recognises the importance of an open and transparent engagement between the client, its workers, worker representatives, local communities and persons affected by the project and, where appropriate, other project stakeholders as an essential element of good international practice and corporate citizenship.

4.5. Gap Analysis

Table 4-1. Gap Table

Topic/Issue	Key IFC/ EBRD requirements	National Requirements	Gap	Actions to be taken to bridge the Gap
Avoidance and Minimization	According to IFC PS 5/ EBRD PR 5 involuntary resettlement should be avoided where feasible or minimized.	There is no provision regarding avoiding and minimization of resettlement in Turkish expropriation law.	Minimization of land acquisition and involuntary resettlement needs to be addressed	Land acquisition and involuntary resettlement has been minimized by the Project. The Project does not acquire land outside Port premises.
Census and Baseline information	A census is required when land acquisition is triggered in order to establish an inventory of land and assets to be affected, to determine who will be eligible for compensation and assistance, and to discourage ineligible persons, such as opportunistic settlers, from claiming benefits.	Turkish Law requires preparation of inventory of assets. Land acquisition through expropriation requires the preparation of a census (full count) of affected immovable assets, and a full list of their owners.	National requirement is limited to census of immovable assets and legal titleholders. Census and baseline information on Project affected populations as defined by IFC PS5, EBRD PR 5 including tenants, users of communal lands, land holders/occupants without legal or customary title is not required.	The Project does not entail land acquisition. Census baseline information is compiled for Agency Boats that will be relocated during Project Construction. Baseline information on potentially impacted businesses is also collected to monitor potential project impacts.
Cut-Off Dates	The Borrower will establish a cut-off date for eligibility. Information regarding the cut-off date will be well documented and will be disseminated throughout the project area.	There is no provisioning for cut off dates for PAPs that use public/private lands.	IFC/ EBRD requires a census study for establishing a cut-off date	Disclosure is the cut-off date for Project's eligibilities.

Addressing Loss of Livelihoods	In addition to compensation for lost assets, economically displaced persons whose livelihoods or income levels are adversely affected will also be provided opportunities to improve, or at least restore, their means of income-earning capacity, production levels, and standards of living.	There is no provisioning in the Turkish Law for livelihood restoration.	There is no provision of livelihood loss or assessment of individual livelihood impacts.	An LRP has been developed by to mitigate potential livelihood losses triggered by the Project.
Measures for Vulnerable Persons	Particular attention should be paid to the needs of vulnerable groups, especially those below poverty line, the landless, the elderly women and children. Livelihood planning should provide special assistance to women, minorities or vulnerable groups.	Expropriation Law does not specify vulnerable groups. However, under the Turkish Constitution, the State guarantees his citizens to continue their lives in peace and security, also socio-economically encourage them to reach a high standard of living. In this context, the State applies several rules and measures to protect and to support its needy, weak, helpless and homeless citizens (ex. The Law No.2022 date 01.07.1976).	Land acquisition does not address vulnerability.	Vulnerable groups are also beneficiaries of LRP.
Monitoring and Evaluation (M&E)	M&E is required for projects that cannot avoid physical and economic displacement. Resettlement and livelihood restoration of the affected persons should be monitored for such projects.	No provisions for monitoring the implementation or impacts of expropriation or resettlement.	No provisions for monitoring the implementation or impacts of expropriation or resettlement.	MIP will conduct internal monitoring. There will be third party monitoring for LRP.

Level and timing of Community Engagement / Consultation / Negotiation / Participation	The Borrower should initiate consultations as early as possible and should consult PAPs about the Project's environmental aspects and should take their views into account.	EIA process involves consultations with PAPs and disclosure of relevant plans/lists. There is no requirement for SEP. The Law of Notification ensures that all affected people are informed in writing.	There is no provision for effective community engagement through disclosure of project-related information and consultation with local communities on matters that directly affect them. Consultations with communities are in later phases of the Project, either during EIA or formal land acquisition notification.	The Project has a SEP defines stakeholder engagement, organizational chart, grievance management and disclosure process. MIP started engaging with PAPs through consultations, individual meetings, broad based information dissemination activities (concert at Ataturk park)
Information Disclosure	Disclosure of information to provide Affected Communities with access to relevant information ¹⁸ on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism.	Public participation meetings are conducted in accordance with the requirements of the national EIA Regulation as part of the EIA process. This allows consultation with the project-affected communities to a certain extent during the scoping phase of the national EIA process. Upon completion, EIA disclosure is compulsory. Public disclosure/information meeting is officially announced 10 days prior to the meeting; the meeting is attended by an Officer from Provincial Directorate of Ministry of Environment and Urbanization.	Disclosure content is limited to EIA and does not include social issues/concerns.	Public disclosure will be conducted according to IFC standards and EBRD PR 10. All supplementary documents SIA, SEP, LRP will be disclosed according to PS1, PR10.
Project-level Grievance	Where there are Affected Communities, the client will	Reference can also be made to the Law on the Use of the Right to	There is no grievance mechanism requirement.	There is a grievance mechanism in place.

¹⁸ Depending on the scale of the project and significance of the risks and impacts, relevant document(s) could range from full Environmental and Social Assessments and Action Plans (i.e., SEP, RAP, Biodiversity Action Plans, Hazardous Materials Management Plans, Emergency Preparedness and Response Plans, Community Health and Safety Plans, Ecosystem Restoration Plans, and Indigenous Peoples Development Plans, etc.) to easy-to-understand summaries of key issues and commitments. These documents could also include the client's environmental and social policy and any supplemental measures and actions defined as a result of independent due diligence conducted by financiers.

<p>Redress Mechanisms</p>	<p>establish a grievance mechanism to receive and facilitate resolution of Affected Communities' concerns and grievances about the client's environmental and social performance</p>	<p>Petition no 3071 and Law on the Right to Information No 4982.</p> <p>Right to Information No 4982 states "Institutions are required to apply administrative and technical measures to provide every kind of information and document, with the exceptions set out in this law, to provide the information for applicants; and to review and decide on the applications for access to information promptly, effectively and correctly."</p>	<p>Grievances will be recorded/responded and necessary actions are taken from the beginning of the Project.</p>
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5. Project Potential Impacts

The Project construction phase activities include the extension of existing berth and yard, construction of new cruise terminal, shortening of main breakwater, and dredging to increase channel depth to allow larger vessels to access the port area. The impact of each Project activity differs according to the three identified PAP categories:

- Expansion and additional fill areas have direct impacts on agency boats, since these will have to be relocated during the Project construction phase.
- Vendors in Ataturk Park may lose customers due to construction noise and visual impact,
- Tour boat operators that operate out of Ataturk Park may face limitations to the route of the recreational trips they offer to their customers.

Potential impacts on livelihood of each project activity on PAPs are assessed below.

5.1. Agency Boats

Baseline: Agency boats which operate in the port are managed as a company and a cooperative on behalf of the owners of these boats. They have been operating since 1980. They established a Cooperative in 1992 and became a company in 2014. The Cooperative has seven members, each representing a company.

- Agency boats provide logistics support, personnel change, ship arrival control, patient and injured evacuations, sampling, supplies and technical material needs of ships in Mersin port area. They provide their service from the pier No.1 within MIP, where they are currently docked. The agency boats have to operate from a pier with customs services.
- They operate with a total of 7 boats, 4 of which are metallic and 3 wooden. There are 3 types of boats according to their capacity. Boat capacities vary between 2-15 tons.

Table 5-1. Length and Capacity of Agency Boats in Mersin Port

Boat type	Capacity - Ton	Length - Meter	Number of Boats
1	2	10	3
2	10	13	1
3	15	15	3
Total			7

- 24 hours service is provided. There are 2 on-duty workers left at night.
- The number of boats operating at the same time is usually 2 during the day. 6-7 boats have never sailed at the same time.

Legal Status:

- Agency boats work in accordance with the laws and regulations regarding ports. According to the legal regulations, they are required to serve in the customs bonded area.

Employees:

- Agency boats are operated in the form of family business. Businesses are passed from father to son.
- Total number of employees is 12, including cooperative partners (7 + 5 person). 2 of the total employees are women. Women employees work as office staff, they do not work on the boats.
- They work throughout the year.
- This is a full time job for employees.
- There are 2 people working on each boat.
- Employee wages vary between 5-7 thousand TL net. Insurance and meal costs per employee vary between 4-5 thousand TL on average.

Main Income¹⁹ and Expenditures:

- The main expense item is fuel. An average of 5 litres of fuel is consumed in half an hour of work. An average of 10 litres of fuel is consumed per trip.
- They make an average of 3-4 trips a day, an average of 20-21 trips a week, an average of 100-120 trips a month.

Main Issues/Concerns:

It has been stated by MIP that they may have to leave the port during the construction period if so instructed by the Port Authority. In this case, they may have to go to a non-customs area, since the alternatives for an area that will remain within the customs area are very limited. The closest alternative to the non-customs area is Çamlıbel Fisherman's Shelter. However, they are concerned that if the currently prepared project to construct there a marina or boat docking centre proceeds, they may not be able to use that area during the construction period of that second project.

The main concern of agency boats was about the potential change of their current location in the MIP area to a non-customed area, i.e. outside of the MIP area, during the construction period (not a permanent impact). They also said that relocation to another place may increase their fuel costs.

Because their concern is about the increase in their operation costs (and they do not want to share information about their income), the approach of this report is to focus on preventing the potential increase in their costs and suggesting mitigations to achieve that.

MIP Progress

After the impact report was presented to MIP, MIP took immediate action and organized a meeting with the agency boats representatives on 3rd March 2022. According to the decisions made in the meeting, **agency boats will be operating in the custom bonded area in the port during the Project construction.** MIP will provide a suitable location in the western side of the to-be-build EMH2 berth. The meeting minutes (See Annex 12.2) were signed by MIP and agency boats representatives.

The new location in the MIP area will not increase the operation cost of agency boats. On the contrary, it will actually be more beneficial than the current location.

Stakeholder Engagement

Three separate meetings were held with agency boat operators. In August 2021, MIP conducted an interview with them and informed them about the project. Agency boats were informed about the Project once again at a meeting held December 2021 by MIP Naval Operations Manager. Thus, they had detailed information about the Project but they needed an answer about their relocation during the Project construction period. Hence, MIP arranged another meeting to discuss alternative sites for relocation.

Summary of requests and recommendations of agency boats:

- Since a non-customs area at the MIP port will increase their costs, they want to be given a place in an area from the MIP port area during the construction period. As a suggestion, they proposed the Little 11 berth in the MIP. If this area is not suitable, they are also willing to have another area.
- They would like to be accommodated at the MIP port during the operation period and to continue their activities. (MIP guaranteed that agency boats will be located inside the port area and continue to their service as now.)

¹⁹ Agency boat operators did not disclose income information due to commercial privacy.

- They stated that they would be pleased to be supported to reduce the additional costs (fuel etc) during the construction in case it is a non-customs area.

These requests were accepted by MIP, and they are offered a space within MIP that is now subject to final approval from the Port Authority. Agency boats will apply to Port Authority for allocation of the space offered by MIP. Port Authority will then request MIP's opinion on this location. Upon MIP's approval, Port Authority will designate the agreed location to agency boats.

5.2. Tour Boats

Baseline: Interviews were held with 4 out of 6 tour boats which work in Atatürk Park. 2 of the tour boat owners were not available during the field visit. Interviewees are both the owner and the employees of tour boats. Details are given in the table below.

Table 5-2. Basic Information about Tour Boats in Atatürk Park

No	Operated by	Boat Name	Age	Service Area	Interview Status	Number of Employees (Boat Owner Included)	Passenger Capacity
1	Ecevit Eryürekler	Trois	48	Only tour boat	Completed	8	112
2	Adnan Dirgöl - Abdullah Dirgöl	Adnan Kaptan	48	Restaurant service with alcoholic beverage included	Completed	5	105
3	Yaşar Eryürekler	Baba Ahmad	58	Only tour boat	Completed	4	35
4	Ali Yüzgeç	Seyhan 2	39	Restaurant service with alcoholic beverage included	Completed	4	120
5	Ömer Çetin	Şimal Yıldızı		Restaurant service with alcoholic beverage included	Unavailable	Information could not be retrieved	Information could not be retrieved
6	Hasan Esmer	Unknown		Private Tour Boat	Currently inactive due to health condition of the owner	Information could not be retrieved	12

- Tour boats operate every month of the year. Most work takes place on weekends and during the summer months.
- 3 of the boats also provide restaurant service with alcohol. In the evening they provide a one-hour cruise and mooring service.
- The departure points of the boats are on the edge of Atatürk Park. A space of 50 meters is left between each boat to avoid customer quarrels amongst boats. These departure places are not official and legally permitted places. Departure times are random, dependent on the number of passengers and boat occupancy.
- The months with the most customers are between April and October.
- A tour takes approximately half an hour.

Legal Status

- Tour boats have legal license to operate as tour boats. However, they have no specific legal permission to use Atatürk Park as departure location and Çamlıbel Port for anchorage. On the other hand, they pay a toll of 8-10 thousand TL per boat per year to the Directorate of National Real Estate for using Çamlıbel Port. Although they do not have legal permissions, they are apparently allowed to operate in this area.

Employees

- Businesses are operated as family enterprises. The workforce consists of same family members. The number of employees varies between 4-8 people, including the boat owner. They are full time workers who work 7 days in a week. Their working hours change depending on the passenger numbers and demands. In general, 1 or 2 employees are formal with social security insurance, the rest are family members or relatives working per daily wages.
- Both the owners and employees of tour boats have a low level of education. Even the younger members of the families (high school age) do not go to school and work on the boats. It was observed that this situation should be considered by MIP while planning the communication and information disclosure with these PAPs.
- In general, there is a wage scale based on daily wages. It varies between 100-200 TL per day. The distribution of wages is mostly based on revenue.
- It is obligatory to have an official captain on board. Therefore, a retired captain is employed. The owner of the two boats is also the captain.

Main Expenditures

- They use Çamlıbel Fisherman's Shelter for anchorage. For this, they pay a mooring fee of 8-10 thousand TL per boat per year to the Directorate of National Real Estate.
- The main expense of the boats is the fuel that costs 1000 TL²⁰, which they purchase every two days or once per day at peak times. The fuel cost of a half-hour tour varies between 30-50 TL.
- Another major expense item is boat maintenance. In order to take care of the boats, they lay the boats in dry docks in Erdemli and pay a per meter fee according to the length of the boat. They do the maintenance themselves. Maintenance costs are made once a year, sometimes every two years during the Ramadan period which has a lowest level of customers due to religious fasting. The dry dock duration does not exceed 30 days. Maintenance costs vary between 10-20 thousand TL per year. The average hull length of passenger ships with a capacity of 100 passengers is 26 meters.
- Cumulated expenses, including maintenance costs, personnel costs, fuel costs, mooring fees, etc., are in an average of 240 thousand TL per year.

Main Income

- The families who own and work tour boat business have no other income resources. Their main income is the revenue from tour boats.
- In summer, when customers are many, the daily turnover varies between 1,000-1,500 TL. At the weekend, this amount varies between 3,500-5,000 TL.
- Buffet service on all boats – tea, beverage, etc. – exists.
- Although the official fee is 20 TL per person, a variable, informal fee schedule is generally applied depending on the number of passengers and their demand.
- The number of daily tours varies between 10-12 in summer , 6-7 in spring and 2-3 in winter season.

²⁰ Prices used in this report are based on February 2022 in-depth interviews. They have not been adjusted to inflation.

Main Issues/Concerns Raised by Tour Boat Operators and MIP responses:

1. Potential loss of customers due to increased traffic at port: The main perceived negative impact of the Project is potential changes to the tour departure location, route, and tour return locations due to increased ship traffic in the port during construction and operation. They are worried that they will have to wait for the entrance and exit of the large ships approaching the port, and will not be permitted to tour during larger vessels entrance to the port even if their boat is full of passengers. This issue is their main concern about the Project and **they would like to have clear information on how the port ship traffic may affect passenger services of the tour boats during the construction and operation periods.** MIP **strongly emphasizes** that there **will be no increase in port traffic during the construction.** On the contrary, a decrease in number of the ships is expected due to construction in the port. As for the operation period, MIP states that coming of larger ships will not impact tour numbers in a day. Larger ships use the port currently and tour boats arrange their tour period accordingly. There will be no change in the current route. This is confirmed by Port Authority.
2. Potential changes to their passenger pick up locations: There are also concerns that the section of Atatürk Park closest to the port will be used as a container yard in the future. If this happens, there will be no passenger pick-up and departure places for them in the park. MIP and Port Authority confirmed that the construction is within existing MIP borders and there **will not be any interference with tour boat departure locations.**

Stakeholder Engagement:

According to tour boat operators, they have a very limited relationship with MIP. Only one tour operator was contacted and informed by MIP about the Project²¹. **They have no information or have misinformation about the details of the Project** (construction area, construction period etc.), grievance mechanism, responsible parties/institutions, contact numbers etc. There is a need for information meetings directly by MIP with tour boat owners.

5.3.Çamlıbel Port Users

Baseline

Amateur Fishermen's Association (AFA) is located on the entry point of Camlibel Port. AFA has around 2000 members, and 375 boats are moored at Camlibel port. The association leases the shelter from National Real Estate. The terms of tenancy are annual. According to the President of the association, the breakwater used by AFA was demolished partially in 1993 by the Municipality due to illegal construction claims, and its length was reduced by 7m. The storm of 2019 further damaged their breakwater.

Other users of Camlibel Port are stationary restaurant boats that may be impacted by storms and stronger waves. They will also be protected and operate in safer environment once Camlibel Port project is constructed. If the port project does not go ahead, then MIP's offer to rebuild the exiting breakwater of AFA will also provide protection to restaurant boats.

Main Issues/Concerns

The AFA used to have their own breakwater, however, it was damaged in 2018 after a storm. As they do not have their own breakwater, they are prone to increased waves when weather is stormy.

Possible Solutions and Mitigations

²¹ A tour boat owner was visited to give information about the Project on 11th September 2021 and 23rd December 2021 by MIP.

The AFA also engages directly with Akdeniz district Municipality, one of the municipalities within Greater Mersin. Akdeniz Municipality is planning on rebuilding Camlibel Port where AFA is located. However, Camlibel Port (Annex 2) is a multistakeholder project led by AYGM. The Director of Provincial Environment and Urbanization Ministry stated that the Camlibel Port Project entails safer anchoring for fishermen, and water sports and light show that would attract tourists to Ataturk park in addition to providing trading areas for small scale vendors such as coffee houses, local art crafts. The goal of the Camlibel Port Project is the revival of Ataturk park, which has lost its appeal since 2011, after the construction of Mersin Port and Forum Mersin shopping center. Both the Akdeniz district Municipality and AYGM are keen on urgent construction of Camlibel Port. The stated timeline for completion of the port project is before 2023. However, since the project has not been officially approved and tendered; it may be delayed.

The fishermen believe that Camlibel Port project would respond to their needs, and they support the project. They also have an open communication with MIP. They have stated that “if the Camlibel Port Project does not go ahead as planned, we can ask for permits for restoring the breakwater with MIP’s support”. Yet, the Akdeniz Mayor assured them that the Port project will be implemented shortly²².

MIP will continue with engagement with AFA on monitoring impacts and to follow up alternative solutions for AFA. Because there is possibility that both Camlibel Port and reconstruction of shelter breakwater will not happen. MIP will engage with AFA regularly through reported meetings and monitor impacts as well as discussing alternative protection measures with fishermen for windy weather.

Stakeholder Engagement:

MIP started engagement with the AFA to assess if they have been also impacted by shortening of the breakwater of MIP. Main concern of fishermen is restoring their own breakwater to pre-2019 conditions. The previous damage to AFA’s breakwater was caused by extreme weather conditions. In order to avoid any further damage due to climate change, the fishermen request restoration of their breakwater. MIP has already committed to restoring their breakwater should AFA attain necessary permits. MIP has also prepared formal application letters to be signed by AFA, to assist them in application to permits. However as mentioned above, MIP will continue monitoring situation and assessing alternative measures.

5.4. Vendors and Café Owner In Ataturk Park

There are 19 stationary vendors in Ataturk Park. Four stationary vendors that are located closest to MIP and the owner of the only café in Ataturk Park were interviewed during the field visit. The stationary vendors have been located in their current locations in the park by the Municipality. It was learned that they work in the same location every day because they are not allowed to move their peddler stall. This means that there is no alternative place for them to carry on their businesses in case of a livelihood impact in the park. However, all of the consulted vendors stated that there were working in the park during the previous extension of the berth in 2015-2016, and they were not affected by the construction. Both the vendors and the café owner stated that **they do not expect an impact on their livelihood** or on the number of the visitor of the park due to the current Project.

On the other hand, it was observed that stationary vendors were not informed or contacted by MIP about the Project. Three of four vendors have misinformation that there will be construction works in Ataturk Park. They know that there was a concert organised by MIP in the Ataturk Park. However, they did not participate the concert/information disclosure so they did not have correct information about the Project. Still they believe that the park is an important green area in the city especially for poor people, so even if there will be a construction, the park will continue to be visited. They are not expecting any

²² IHA News Agency on March 1, 2022

changes in their income or any decline in number of visitors due to construction. They do not envision any impact during operation phase of the project.

It can be said that even the stationary vendors who work in a very close location to the MIP do not expect an impact. It is hard to expect an impact for mobile vendors who can make sale in another part of the park in case of an impact by the Project. However, in order to better asses any future impact concern, baseline on mobile and permanent vendors will be recorded including number of vendors, customers/visitors on day/night time and weekday/weekend time before start of construction. Sales and economic activities will be recorded as possible. These will be monitored as identified in monitoring and evaluation plan during construction and operation.

5.5.Cumulative Impacts

5.5.1. The Kapı (Date) Project

Heavy traffic around the MIP due to long lines of lorries waiting for access into the port is the main grievance voiced by consulted stakeholders. The Kapı (gate) project, developed by MIP and supported by all public stakeholders, is critical for EMH2, since the capacity of the port will increase from 2.6M TEU to 3.6M TEU, with lorry traffic increasing accordingly.



Figure 5-1. Gates of the Port

Source: Social Impact Assessment

According to the SIA: "Kapı Projesi - Gate Project" will be implemented concurrently with the extension project. With this project, it is aimed to separate the port traffic from the city traffic and to shorten the waiting times for the trucks. For the project, MIP cooperates with other project stakeholders (Mersin Governorship, TCDD, General Directorate of Highways, State Hydraulic Works, Mersin Metropolitan Municipality, Akdeniz Municipality, Naval Forces Command, National Real Estate, Veterinary Medicine, Coast Guard, and other stakeholders). If this project is implemented, Gate B will be for container gate out, and Gate C will be completely closed. Trucks entrances and exits will be connected directly to gate D via a 12-lane road and no truck entry and exit will be made from other gates".

During field visit, it was learned that MIP has already disclosed the Kapı Project to key stakeholders and that it received a warm welcome. The Kapı Project entails the demolition of a building housing the Provincial Directorate of Agriculture and Forestry. The Project is being coordinated by the Governor and is expected to follow National legislation. Governor will assign a new place for the Directorate of Agriculture and Forestry. Land delivery for Kapı Project is not within the responsibility of MIP.

5.5.2. Çamlıbel Water Sports and Boat Berthing Area Construction Project

Çamlıbel Water Sports Project is often referred to as the marina project in the press²³. There is only one planned project at Camlıbel Port which is inclusive of a water sports facility, boat berthing and commercial services.

On 08.09.2020, Adana Transport 5th Regional Directorate made a tender for the preparation of "Çamlıbel Water Sports and Boat Berthing Area Construction Project Feasibility Study"²⁴. According to the specification, feasibility should be prepared in 200 days. However, it is not completed. This is also confirmed by AYGM, disclosed information on "Ongoing Ports And Coastal Structures Survey Project Works" prepared on January 22²⁵.

On August 06, 2021, Mersin Provincial Directorate of Environment and Urbanization decided that "Environmental Impact Assessment is Not Necessary".

During the meeting with the Deputy Director of Environment and Urbanization on March 31, 2022, it was learned that a zoning change decision was required for the project to be put out to tender, and zoning plan changes for this project is ongoing. Once zoning plan is announced, any legal person can oppose the zoning change and go to court. The pace of project's construction will depend on project's zoning approval since there cannot be a tender prior to zoning approval.

The steps required for a project that is in the feasibility stage to be included in the investment program are briefly summarized below by the Presidency of the Presidency of Strategy and Budget (CSS);

1. It is obligatory to prepare a feasibility study in the required format for projects with a project cost of 10 million TL or more.
2. New projects will be proposed to the investment program after the Feasibility Study to be prepared on the condition that it is based on the final project and, if required by the relevant legislation, EIA Positive Certificate or EIA is not required.
3. The study to be prepared can only be included in the investment program after it is approved by the CSS and the President.

Currently , the project is not listed amongst the investment program²⁶ for 2022. In order to be included in the program, the above steps must be completed and a zoning permit must be obtained.

Çamlıbel Water Sports and Boat Berthing Project is expected to directly impact AFA and stationary restaurant boats within existing Çamlıbel Port. Both parties welcome this project, as it offers a higher quality of services and infrastructure. However, given the pace of the project, construction is not expected to start before 2023.

5.6. Vulnerable People

Project is not expected to trigger Project induced vulnerabilities. However, there may be vulnerable people amongst boats' employees. Project will not aggravate their vulnerability. The Project will not induce livelihood impact. Therefore there are no livelihood provisions targeted. .

From a gender perspective, there are two female employees on agency boats but their office is located outside the port, so they will not be impacted by the Project. There are also 2 female Employees on tour boats. As no changes to tour boat routes are envisioned, there will not be adverse impacts on livelihoods of women employees of tour boats.

²³ <https://www.denizbulten.com/haber-camlibel-marina-projesi-mersin-e-lig-atlatacak-34228.html>

²⁴ <https://www.ilan.gov.tr/ilan/642702/ihale-duyurulari-hizmet-alim-ihaleleri-etud-proje-hizmeti-alinacaktır>

²⁵ <https://aygm.uab.gov.tr/uploads/pages/limanlar-ve-kiyi-yapilari-daire-baskanliklari/2022-ocak-devam-eden.docx>

²⁶ http://www.mersin.gov.tr/kurumlar/mersin.gov.tr/II_Yatirimlari/2022_Yatirimlar/2022YIResmiGazete.pdf

6. Livelihood Restoration

6.1. Key Principles

The key livelihood restoration principles that the Project Company has committed to implementing are as follows:

- MIP ensures that construction works will not block access to, or impose any restrictions on Atatürk Park during construction period and operation period. MIP will record baselines on vendors and visitors to Ataturk park before start of construction and will continue to monitor changes as identified in monitoring and evaluation.
- MIP recognizes the responsibility to relocate agency boats to a new location within the port during the construction period and ensures that these boats operate within the MIP during the operation period. MIP agrees to allocate a new location to agency boats, once this location is approved by Port Authority and Customs.
- MIP will regularly inform the PAPs addressed in this LRP regarding Project activities and record these activities.
- Project's impact on businesses (tour boats/vendors) will be monitored and reported regularly.
- All PAPs will be informed about grievance mechanism.
- MIP agrees to rebuild the breakwater of Amateur Fishermen's Association and pay for the cost of reconstructing the breakwater if the necessary legal permits are obtained by Amateur Fishermen's Association and the relevant institutions and there are no legal obstacles to start the construction. MIP will also continue to monitor and report impacts as well as discussing alternative measures in consultation with AFA in case breakwater construction is not permitted.
- In order to mitigate potential adverse traffic related cumulative impacts, MIP will compensate by covering the construction costs of the Doors Project. Doors Project will be managed by Provincial Governor. MIP will report the progress with this project to the Lenders regularly.

6.2. Cut-off date

Cut-off date is the date after which anyone who moves into the project area is no longer entitled to compensation and/or assistance. Persons found occupying the Project area after the cut-off date will not be eligible for Project compensation or other resettlement benefits.

Cut off date for this Project is 3 March 2022 when MIP and agency boats signed an agreement for new location.

6.3. Entitlement Matrix

Entitlement matrix prepared as part of this LRP aims to address the types of losses/impact and define the entitlements pertaining to the Project components/phases.

The underlying principle of this LRP is to improve or, at minimum restore the affected livelihoods to pre-project standards. Entitlements are based on the type of loss/impact and where necessary PAPs' categories/characteristics. Entitlements that will be provided to PAPs as per this LRP are presented in below table.

Table 6-1. Entitlements Matrix

No	Impact Category	Entitlements	Remarks
Construction Period			
1	Agency Boats' physical and economic displacement	New location provided within MIP port for 7 agency boat companies operating under cooperative	If the new offered location in MIP port is not accepted by Port Authority and/or Customs, MIP will be responsible for covering for additional fuel cost and relocation cost of agency boats until operation period when they are allocated a place within the port.
2	Tour Boats There are 6 tour boats operated by approximately 25-30 PAPs.	<p>MIP will inform tour boats face-to-face to address their concerns about:</p> <ul style="list-style-type: none"> Planned breakwater distance, dredging vessels activity in the Project, how much the Port will expand and how this will impact the tours etc. <p>The construction is within existing MIP borders and there will not be any interference with their departure locations in Ataturk Park</p> <p>MIP will facilitate training of boat captains with Ship Traffic Services on traffic management and safety within Port.</p> <p>Active grievance mechanism</p>	MIP will hold information sharing and training session with tour boat operators, as they are also within vulnerable groups.
3	Vendors in Ataturk Park	No significant impact is envisioned.	

No	Impact Category	Entitlements	Remarks
	19 Stationary Some mobile	Baselines for all will be recorded and regular monitoring of stationary vendors (especially 4 in close proximity to construction area) Information sharing and grievance management	
4	Amateur Fishermen's Association (AFA), and Restaurant boats and AFA members around 2000 members, and 375 boats.	Shortening of breakwater has caused some disturbance to AFA members, MIP is committed to rebuilding AFA's breakwater should necessary permits of construction is applied to and received by AFA. MIP is to meet regularly with AFA to receive progress on permitting, share meeting records in internal monitoring reports. MIP is to meet with AFA regularly to monitor impacts, report and discuss alternatives if breakwater reconstruction is not permitted. The shortening breakwater impact is limited to construction phase of the Project, since during operation, the extension will also impede potential high waves Active Grievance mechanism	MIP led consultations and proposed the solution of rebuilding breakwater, however AFA is awaiting the construction of Water Sports facility. Water sports facility's zoning works were ongoing during preparation of this report (April 2022). Exact date tender for construction works are unknown.
Operation Period			
1	Agency Boats' physical and economic displacement	Agency boats will be allocated a new place within the extended port Continuous engagement	Should the agency boats prefer to stay in their location allocated during construction period, MIP, Port Authority and Customs

No	Impact Category	Entitlements	Remarks
			need to engage and ensure agency boats' requests are considered.
2	Tour Boats There are 6 tour boats operated by approximately 25-30 PAPs.	MIP will facilitate training of boat captains with Ship Traffic Services on traffic management and safety within Port. Active grievance mechanism	MIP will hold information sharing and training session with tour boat operators, as they are also within vulnerable groups.
3	Vendors in Ataturk Park 19 Stationary Some mobile	No significant impact is envisioned Record of baselines and Regular monitoring of stationary vendors (especially 4 in close proximity to operation area) Information sharing and grievance management	
4	Amateur Fishermen's Association (AFA), and Restaurant boats and AFA members around 2000 members, and 375 boats.	Once the extension is completed, breakwater impact and larger waves will not be issue. MIP will monitor the breakwater and engage with AFA within CSR related activities	

7. Stakeholder Consultations and Disclosure of Information

7.1.1.1. Stakeholder Engagement and Disclosure Activities in 2021

MIP conducted 40 meetings with 33 stakeholders between February 2021-January 2021; including Mersin Governor, 2 experts from Mersin Metropolitan Municipality, Mayor and Deputy Mayor of Akdeniz Municipality and Mayor of Mezitli Municipality, 4 public institutions, 10 NGOs, 4 embassy, 2 political parties, 5 business enterprises, 1 journalist from press, 2 sports club and 2 courtesy visits to Mersin Metropolitan Municipality Press and Public Relations Department and Ankara CHP (list of stakeholders is given below in Table 1). MIP also held 9 stakeholder engagement activities (details are given below in Table 2). Disclosure brochures on EMH 2 Project were distributed 4 mukhtars of Üç Ocak, Cami Şerif, Kültür and Yenimahalle Neighbourhoods on September 9th, 2021.

Table 7-1. Stakeholders Engaged by MIP in 2021 (sorted by date)

No	Stakeholder Group	Institution	Date
1	Public Institution	Mersin Governorship (Governor Ali İhsan Su)	01.02.21
2	Embassy	Denmark Embassy (Ambassador)	11.02.21
3	NGO/Chamber	Mersin Chamber of Shipping and Commerce (MDTO)	02.03.21
4	NGO/Chamber	Mersin Chamber of Commerce & Industry (MTSO)	03.03.21
5	NGO/Union	Union of Mediterranean Exporters (AKİB)	12.03.21
6	NGO/Association	Mersin Industrialists and Businesspeople Association (MESIAD)	20.04.21
	Embassy	The Ambassador of Netherland	21.04.21
7	Business Enterprise	Turkish and Arab Businessmen Association (TURAB)	22.04.21
8	Municipality	Akdeniz Municipality (Mayor)	28.05.21
9	Sports Club	Çukurova Women Basketball Club	25.06.21
10	Business Enterprise	Fisherman Restaurant Visit	29.06.21
11	Business Enterprise	COSCO	16.06.21
12	Municipality	Mezitli Municipality (Mayor)	06.07.21
13	NGO/Federation	Turkish Journalists Federation	02.08.21
14	Political Party	Azerbaycan Yükseliş Party	13.08.21
15	NGO/Think Tank	Member of Embassy and NOVUSENS	13.08.21
16	Political Party	IYI Party Mersin Deputy Zeki Hakan Sıdalı	23.08.21

17	Press	Sözcü Journalist Çiğdem Toker	27.08.21
18	Municipality	Akdeniz Municipality (Deputy Mayor)	01.09.21
19	Metropolitan Municipality	Mersin Metropolitan Municipality Press and Public Relations Department Head (courtesy visits)	01.09.21
20	Political Party	Ankara CHP (courtesy visits)	03.09.21
21	Municipality	Mersin Metropolitan Municipality Press and Public Relations Department Head Visit From MIP	07.09.21
22	Metropolitan Municipality	Mersin Metropolitan Municipality Principal Clerk	09.09.21
23	Municipality	Mersin University Sports Club	10.09.21
24	Public Institution/Education	Mersin International Port Primary School	21.09.21
25	Municipality	Mezitli Municipality (Mayor)	22.09.21
26	NGO/Association	Çamlıbel Amateur Fishermen's Association (Members of the Board of Directors)	22.09.21
27	NGO/Association	Mersin Çamlıbel Association	01.10.21
28	NGO/Union	Union of Mediterranean Exporters (AKİB)	07.10.21
29	Public Institution	Western Black Sea Development Agency & Çukurova Development Agency Delegation	08.10.21
30	NGO	Çamlıbel Amateur Fishermen's Association	29.10.21
31	Business Enterprise	Tour Boat Owner	09.11.21
32	Embassy	British Embassy Ankara	10.11.21
33	Embassy	US Ankara Embassy Consular	18.11.21
34	NGO/Association	Çamlıbel Amateur Fishermen's Association (Members of the Board of Directors)	25.11.21
35	NGO/Association	Association of International Forwarding and Logistics Service Providers (UTIKAD)	01.12.21
36	Public Institution/Education	İçel İdman Yurdu	03.12.21
37	Public Institution/Education	Toros University	22.12.21

38	Business Enterprise	Tour Boat Owners	23.12.21
39	Political Party	Member of CHP parliament Cengiz Gökçel	24.12.21
40	Municipality Project	Mersin Logistics Training Centre (Akdeniz Municipality Project-Visit by Akdeniz Municipality Mayor, MIP GM, Mersin Chamber of Commerce Chairman)	18.01.22

Key events/activities organized or contributed by MIP in 2021 are listed in the following table.

Table 7-2. Stakeholder Engagement Activities in 2021

No	Event
1	Groundbreaking Ceremony of EMH II Project (March 19th, 2021)
2	Logitrans Logistics Awards
3	International Music Festival
4	Signature Ceremony with Akdeniz Municipality
5	33 Women Documentary Gala Event
6	Launching for Gates Project to the City Protocols (October 19th, 2021)
7	Çamlıbel Street Festival (October 22-24, 2021)
8	Dinner of MIP Management and NGO's Chairmen (October 28 th, 2021)
9	January Working Journalists Day (Sponsorship to the Gala Dinner)

7.1.2. Stakeholder Engagement during LRP Preparation

7.1.2.1. Scoping

The scoping field work took place on December 21-22, 2022. A kick off meeting was held with MIP Project Director and Project Manager. In line with the TOR, consultations with stakeholders were kept at “high level” (relatively general) during this scoping phase. All stakeholders contacted for scoping meetings agreed to meet and discuss the Project. Upon consultations with stakeholders, a close out meeting was held with the Project Director and Project Manager.

Below is the list of stakeholders consulted during scoping visit:

Table 7-3. Stakeholders Consulted during the Scoping

Stakeholder	Title	Meeting Attended by
Provincial Directorate of Agriculture	Fishing and Marine Products Deputy Director	SRM
Çamlıbel Amateur Fishermen's Associations	President and co-chairs	SRM and MIP

Mersin Provincial Directorate of Environment and Urbanization	Director	SRM and MIP
Mersin Port Authority	Director	SRM and MIP
Mersin Provincial Tourism and Culture Directorate	Director and vice-Director	SRM
Akdeniz Municipality	Vice-mayor	SRM and MIP
Mersin Chamber of Maritime Commerce	Board members	SRM
Mersin Hotel	Manager	SRM

7.1.2.2. Impact Identification Field Work

The field work was carried out between February 1-4, 2022 by 4 consultants from SRM Consulting. The field work started with a face-to face meeting with MIP team; and upon completion of field studies, an online closing meeting was conducted to reflect the field findings. The field work focused on consultations with identified PAPs, businesses and one-on-one meetings with key stakeholders (Chapter 3.3 for detailed information).

In addition, MIP prepared a Project Presentation and put it on its website, and also prepared a video about the Project and put it on YouTube.

7.1.2.3. Stakeholder Feedback during the LRP Consultations

During the LRP field consultations, most stakeholders welcome the project and MIP's overall contribution to Mersin. The Project is viewed as essential for keeping Mersin's prominent position as a leading port. However, Mersin Metropolitan Municipality and Mersin Chamber of City Planners were only stakeholders oppose the Project due to Project's content. Due to the court case, there has been no engagement between MIP and these stakeholders.

Main feedbacks regarding stakeholder engagement given by key stakeholders to be impacted by the Project and consulted during the LRP field work are discussed in detailed Chapter 5.

7.2. Stakeholder Engagement for Further Stages

Stakeholder Engagement Plan (SEP) prepared for the Project in July 2021 and updated in March 2022 will be the main guide for stakeholder engagement activities of the Project including the stakeholder engagement during LRP implementation.

Key stakeholders, engagement methods and actions are clearly identified through the SEP. According to the Stakeholder Engagement Programme, defined target groups and engagement actions related with the livelihood impacts or community investment programs are given in the following table.

Table 7-4. Stakeholder Engagement for Further Stages

Target Group	Information to be Shared	Phase	Engagement Vehicle/Methods	Schedule or Frequency
Local communities and businesses in the neighbourhoods	Constraints on sea view and Park usage by construction and operation activities Social projects Community Investment Plan Strategic Communication Plan Livelihood Restoration Plan	Pre-Construction/ Construction	Grievance tool on the website / call centre / written application mechanism Thematic focus group meeting on `landscape impacts` with participation of relevant urban planning experts, project representatives, architects, environmental engineers	Quarterly meeting Continuously/When Needed/When Requested
	Constraints on sea view and Park usage by construction and operation activities Social projects Community Investment Plan Strategic Communication Plan Livelihood Restoration Plan	Operation	Grievance tool on the website / call centre / written application mechanism Thematic focus group meeting	Annual meeting Continuously /When Needed/When Requested
Tour Boats	The reduction of the promenade areas Visual impacts Nuisance caused by construction activities (noise, dust, traffic, access to the Park) Community Investment Plan Strategic Communication Plan Livelihood Restoration Plan	Pre-Construction/ Construction	In-depth interviews Grievance tool on the website / call centre / written application mechanism	Monthly meetings Continuously /When Needed/When Requested
	The reduction of the promenade areas Visual impacts Community Investment Plan Strategic Communication Plan Livelihood Restoration Plan Restriction zones	Operation		Six monthly meetings Continuously /When Needed/When Requested
Agency Boats	Schedule of the Project Construction period works and impacts Regular information sharing regarding port traffic Dredging works Livelihood Restoration Plan	Pre-Construction Construction	Face-to-face meetings In-depth interviews Grievance mechanism	When Needed/When Requested

Target Group	Information to be Shared	Phase	Engagement Vehicle/Methods	Schedule or Frequency
Restaurant boats	Nuisance caused by construction activities (noise, dust, traffic, access to the Park) Visual impacts Community Investment Plan Strategic Communication Plan Livelihood Restoration Plan	Pre-Construction/ Construction	In-depth interviews Grievance tool on the website / call centre / written application mechanism	Monthly meetings Continuously /When Needed/When Requested
		Operation		Six monthly meetings Continuously/When Needed/When Requested
Atatürk Park businesses	Nuisance caused by construction activities (noise, dust, traffic, access to the Park) Nuisance caused by operation activities (noise, traffic, access to the Park) Community Investment Plan Strategic Communication Plan Livelihood Restoration Plan	Pre-Construction/ Construction	In-depth interviews Grievance tool on the website / call centre / written application mechanism	Monthly meetings Continuously/When Needed/When Requested
		Operation		Six monthly meetings Continuously /When Needed/When Requested
Vulnerable Groups (are affected or likely to be affected (directly or indirectly) by the project (affected parties))	Project activities near / around the Park Management of environmental and social risks by the Project Grievance mechanism Employment Any other interest of vulnerable groups Social Projects Community Investment Plan Strategic Communication Plan	Pre-Construction/ Construction	Thematic meetings with women and disabled users of the Park Planned meetings targeting vulnerable groups Leaflets and information sheets Grievance tool on the website / call centre / written application mechanism	Meetings: six monthly during construction When required
		Operation	Thematic meetings with women and disabled users of the Park Planned meetings targeting vulnerable groups Leaflets and information sheets Grievance tool on the website / call centre / written application mechanism	Meetings: Annual during operation When required

Source: Stakeholder Engagement Plan, March 2022

7.3. Disclosure

Reliable and complete Project information will be presented to stakeholders in a manner that takes account of specific local conditions, cultural and language preferences of local communities.

To effectively communicate relevant information to different stakeholder groups, the following documents will be disclosed at the MIP website and in the MIP Office in paper copy:

- Non-technical summary (in Turkish and English)
- The Stakeholder Engagement Plan (in Turkish and English)
- This Livelihood Restoration Plan
- Posters, Booklets, Leaflet and similar materials (in Turkish and English)

The international community will be also able to have access to the English versions of these documents at the Company website.

Information Disclosure Methods

Internet/Web Site

MIP will keep updated project information regularly on the Project website. Grievance mechanism will also be disclosed on the web site with grievance form, description of grievance mechanism and timely feedback will be ensured.

Public Media

Project information will be supplied to public media through appropriate means such as interviews, press releases and website/social media updates. These activities will be coordinated with Communication Department at the MIP.

Publications for people

MIP will give full and timely responses to comments, complaints and questions of local communities and civil society organizations following grievance management procedure. The comments, complaints and questions will be logged, processed / distributed to relevant departments, and response/feedback will be sent back to the applicant timely. For less digitally savvy community members a call centre or written application via information desks/ kiosks will be enabled.

MIP will generally make the necessary information shares through the materials such as booklets, leaflets, posters, and similar materials providing information about different stages of the Project.

8. Grievance Management and Redress System

In order to prevent and/or resolve any grievances in a timely and effective manner, EBRD PR10 and IFC PS1 require establishing and maintaining a permanent mechanism for receiving and handling citizens' grievances, concerns and requests. Main principles of the Grievance Mechanism are:

- MIP will encourage the use of grievance mechanism by making the diverse grievance mechanisms (by website form, e-mail phone, WhatsApp, and written form) visible in different platforms such as social media, billboards, etc. to ensure an open-communication policy.
- Any grievance or request can be submitted verbally (face-to-face or by telephone) or in writing by post or e-mail or by filling in a grievance form by any external or internal stakeholders. Grievance forms will also be placed where external stakeholders can access them such as in front of the administrative building or kiosks, information desks to be installed elsewhere.
- Stakeholders can raise their grievances and requests during any stakeholder engagement activity. All grievances will be recorded in the grievance log.
- The stakeholders will be informed on the grievance mechanism during the stakeholder engagement activities.
- If the person filing a grievance would like to receive a written reply, the reliable contact details should be provided by that person.
- Both signed and anonymous grievances will be accepted. In both cases, any information on the grievance owner's personal details will not be shared with third parties and will be kept as strictly confidential.
- An investigation will be performed for each grievance and results will be recorded in grievance register. The issuer of the grievance will be informed on the findings of the due diligence; whether the grievance is classified as appropriate or inappropriate.
- All project related grievances will be forwarded to Corporate Communication Department for preparing a reply and identifying mitigation measures, if appropriate. The proposed mitigation measures will be discussed in advance with the complainant as far as practical. The maximum period of grievance processing is 30 days. The prepared reply will be approved by the MIP and sent to the grievance owner in 30 days after the receipt of the grievance.
- If the grievance holder has contact information, he/she will be notified when the grievance is received, answered and resolved. If it is necessary to contact the contractors/subcontractors for problem resolution or mitigation measures, MIP and contractors act together.
- A register of grievances will be kept by Corporate Communication Department. This register will include grievance status detail.
- Same process above will be in place for the applications received from The Presidency's Communication Centre (CİMER).
- The news in press and social media will also be followed and recorded in a media news log. Negative news and concerns raised through media channels/platforms will be analyzed by Corporate Communication Department and will be processed through the grievance mechanism.

Court cases and protests will be followed through grievance mechanism by including them into the grievance log. Corporate Communication department will be working with Legal Affairs and Security departments to include previous court cases and protests into the grievance mechanism.

The grievances to the MIP on the Project and Project activities can be forwarded through the following means:

By MIP Telephone: +90 324 241 29 00

By MIP website: <https://www.mersinport.com.tr/iletisim/iletisim-formu/EMH-II-Projesi/583/6071/0>

By Direct Line for grievance:

By MIP E-Mail: info@mersinport.com.tr

By WhatsApp: +90 537 2243285

There will be hard copies of grievance form at:

- MIP Entrance Gate/Office
- Information Desk at Atatürk Park
- Çamlıbel Fishery
- Mersin Port Authority
- Akdeniz Municipality
- Chamber of Environmental Engineers Office
- Other locations defined by the PR company.

These forms can be addressed to

MIP CLO

Mersin Uluslararası Liman İşletmeciliği A.Ş.

Yenimahalle 101. Cad 5307. Sok. No:5 33100 Mersin - Turkey

9. Monitoring and Reporting

The Project Company will be responsible for the implementation of all aspects of the LRP. Parties involved in the different aspects of project implementation will be required to comply with the requirements set out in this LRP. Stakeholder consultations will be done as outlined in the Project SEP document.

9.1. Internal Monitoring

The implementation of the LRP will start after Lender's approval of the document. Continuous internal monitoring, evaluation and periodic reporting on LRP implementation will be undertaken by the Project Company and will involve participation of key stakeholders including affected persons and other project stakeholders. Internal monitoring will be done by Corporate Communication Department reporting to the Project Manager. Project Manager will also monitor the LRP implementation through quarterly reports.

Proposed key monitoring indicators under this LRP are listed in below table.

Table 9-1. Key Monitoring Indicators

Key Indicators	Source of information	Frequency	Responsible Party
Input Indicators			
If needed overall spending for livelihood activities	Financial records	Annual	Project Company
Vendors and visitors data	Baseline counting and monitoring counts	Baseline before construction and monitoring semi annual	Project Company
Number of Project Impacted Agency Boat Owners and Employees	Census data	Quarterly	Project Company
Number of stakeholder meetings and consultations	SEP and data management	Monthly	Project Company
Number of consultations with AFA	SEP and data management	Semi-annual	Project Company
To support Çamlıbel Port breakwater construction costs/ other projects supported for AFA	Financial records	Annual	Project Company
Output Indicators			
If needed number of agency boat owners compensation	Data management	Annual	Project Company
Number of compensation agreements signed	Data management	Annual	Project Company
Number of grievances related to project activities	Grievance Database	Monthly	Project Company
LRP activities provided	Data management	Monthly	Project Company
Number of beneficiaries of Çamlıbel Port Breakwater / or other projects developed with AFA	Data management	Annual	Project Company

9.2. External Monitoring

External monitoring will be conducted by independent consultants selected for E&S monitoring as required by the Lenders. During E&S monitoring, external consultants will monitor LRP entitlements in order to:

- To verify that entitlements and commitments described in the Livelihoods Restoration Plan are being/ and have been delivered;
- To review the status of grievances pertaining to LRP
- To identify any corrective actions necessary to achieve completion of the Livelihood Restoration Plan commitments.

Monitoring of the Project against defined monitoring indicators will ensure effective implementation of the livelihood restoration and compensation measures set out in this LRP .

9.3. Reporting

Internal monitoring reports will be delivered monthly to the Project manager. Project Manager will prepare quarterly monitoring reports, and share them with the Lenders.

External monitoring reports will be prepared semi-annually, including the first year of operation.

Table 9-2. Reports List

No	Report's Name	Responsible Unit	To Whom	Period
1	Monthly Internal Monitoring	MIP Corporate Communication Officer	Project Manager	Monthly
2	Quarterly Internal Monitoring	Project Manager	To Lenders	Quarterly
3	External Monitoring Report	External Consultants	To Lenders	Semi-annually
4	Annual Environment and Social Report	Lenders	To lenders and MIP	Annual

10. Roles and Responsibilities

10.1. MIP Roles and Responsibilities

Table 10-1: Roles and Responsibilities

Roles of MIP Team	Responsibilities
General Manager And Project Manager	<ul style="list-style-type: none"> ▪ To approve this Plan and allocation of the resources required for implementation of this Plan ▪ To assign required number of personnel and resources required for implementation ▪ To take appropriate actions to address major non-Conformities, based on audit and monitoring reports ▪ Commitment to LRP implementation by allocating adequate human and financial resources required for implementation ▪ Ensure adequate resources are allocated for the implementation of the LRP during the construction phase. ▪ Full ownership of the implementation of LRP. ▪ Ensure contractors and subcontractors are fully aligned with the LRP, as required by the Project Company.
Corporate Communication Department	<ul style="list-style-type: none"> ▪ Oversee compliance of LRP related implementations with the EBRD PR1, PR10 and IFC PS1 ▪ Approve LRP updates and training documents on the implementation of the LRP . ▪ Ensure effective and periodic communication with the external stakeholders in the issues relevant to Project-related land acquisition. ▪ Ensure community grievances relevant to Project-related issues are collected, registered and responded by the Project Company as well as contractors and subcontractors as per the Project SEP. ▪ Keep the database of land acquisition related public grievances. ▪ Review budgetary limits and develop Project-specific strategies in coordination with the General Manager. ▪ Ensure coordination and consistency across all stakeholder facing activities by all parties, including local entrepreneurs impacted by Project-related activities. ▪ To record all external stakeholder consultations and meetings ▪ To record all grievances / requests (by whom, date, status, open, pending, closed etc.) in the Grievance Log/Database ▪ To communicate with Department Head of Environmental Control and Protection, Legal Department and other relevant departments for evaluation of the grievances/requests ▪ To provide feedback to stakeholders in max. 30 days after receiving grievance/request ▪ To coordinate Media Relations to ensure transparent communication with local and national press and other media institutions through appropriate means as such press statements, meetings ▪ To prepare of annual communication strategy ▪ To act as a community liaison officer as the focal point for community concerns and will be conducting reach out activities
Corporate Communication Officer	<ul style="list-style-type: none"> ▪ Act as the Corporate Communication Officer as per corporate procedures ▪ Ensure effective and periodic communication with the external stakeholders during the construction phase on subject including project impacts and mitigations. ▪ To ensure that LRP and SEP are up to date and appropriate to the nature and scale of the Project ▪ To communicate with Corporate Communication Department for evaluation of the complaints / suggestions ▪ To make SEP available to employees of MIP, construction constructor and sub-contractors

	<ul style="list-style-type: none"> ▪ To ensure that this Management Plan is implemented effectively by employees of MIP, construction constructor and sub-contractors ▪ To ensure that LRP and SEP meets requirements of applicable legal requirements, commitments and standards ▪ To ensure that action/measures related to stakeholder engagement directly under MIP responsibilities are carried out timely and adequately ▪ To control effectiveness of LRP and SEP and performance of the construction constructor and sub-contractors through monitoring activities and external audits at the construction site ▪ To collect, organize and review monitoring data and performance monitoring reports provided by the construction constructor and sub-contractors ▪ To report all non-compliances and accidents/incidents related to SEP and implementation of approved corrective ▪ To ensure grievance mechanism trainings is provided by HSE department to the construction constructor and sub-contractors, collect training record provided by the construction constructor and sub-contractors and review them ▪ Presenting KPIs to General Manager along with monthly reports
<p>The EPC contractor and subcontractors</p>	<ul style="list-style-type: none"> ▪ They are not allowed to implement engagement activities directly but have to collaborate with MIP within the framework of this Plan and liaise regularly to discuss status of activities and on emerging issues that should be included in engagement activities.

10.2. Project Impacted Groups Roles and Responsibilities

Table 10-2. Project Impacted Groups Roles and Responsibilities

No	Institution	Project Related/Affected Roles and Responsibilities	Related Regulatory Institutions	Related Project Period
1	Agency Boats	<p>Responsible for making an official application to the Port Authority and the Customs Directorate for a place in the customs area during construction and operation periods.</p> <p>Providing services to ships entering the customs area</p> <p>Acting in accordance with the Ship Agencies Regulation</p>	<p>1. Port Authority - related port activities and give legal permission for the berth area.</p> <p>2. Ship Traffic Services Center - related sea traffic activities</p> <p>3. Customs Directorate - related audit and check inspections and give legal permission in the custom region for the berth area.</p> <p>4. Turkish Coast Guard Command - Ensure the maritime security of the port</p>	C/O
2	AFA (Amateur Fishermen's Association)	<p>Responsible for making an official application to the Port Authority for the Çamlıbel port breakwater</p> <p>To provide the members of the association with information about the project activities, the breakwater and the Çamlıbel port water sports project.</p>	<p>1. Port Authority - related port activities and give legal permission for the construction of breakwater and take legal reviews of related national institutions.</p> <p>2. Ship Traffic Services Center - related sea traffic activities</p> <p>3. Turkish Coast Guard Command - Ensure the maritime security of the port</p> <p>4. Mersin Provincial Directorate of Environment, Urbanization and Climate Change - Monitoring and auditing relevant legal permits for Çamlıbel port breakwater.</p>	C/O
3	Tour Boats	<p>Continuing their tour activities along the route allocated to them in a way that will not disrupt and endanger the port ship traffic.</p> <p>Acting in accordance with the Recreational Boats Regulation</p>	<p>1. Port Authority - related port activities</p> <p>2. Ship Traffic Services Center - related sea traffic activities</p> <p>3. Turkish Coast Guard Command - Ensure the maritime security of the port.</p>	C/O

11. Implementation Costs and Business Plan

11.1. Estimated Budget

The Project Company will allocate an adequate budget for the implementation of the LRP and inform the Lenders prior to start of construction about the allocated budget and the disbursement plan. The LRP budget will have separate items for the compensation and assistance to be provided for Livelihood Restoration and/or Assistance:

Table 11-1. Budget for LRP Implementation

Budget Item	Target PAPs/ Stakeholders	Action
A. Livelihood Restoration Assistance	<p>12 PAPs</p> <p>Owners (Members of the Agency Cooperative) and employees of agency boats</p> <p>There are 7 agency boat companies operating under a cooperative for management and operation of services. Cooperative decides on the number of boats that will be providing service.</p>	<p>These below supports will be provided during the construction and operation phase as specified in the Entitlements Matrix.</p> <p>MIP will find a new location for agency boats in the MIP aera during construction period. This solution should be acceptable to the cooperative (In-kind support).</p> <p>In case the boats are moved outside of the port area during the construction period, MIP will compensate agency boats by paying their additional fuel expense due to their new location during the construction period (In-kind support for additional fuel and/or in-cash support for additional fuel and rental/mooring costs).</p> <p>During the operation period, MIP will provide a location for agency boats (In-kind support).</p>
B. To Develop Çamlıbel Port Infrastructure	<p>Amateur Fishermen’s Association (AFA) and other port users (restaurant boats)</p>	<p>MIP has already committed to restoring their breakwater should AFA attain necessary permits.</p>
C. To Decrease Negative Cumulative Impacts	<p>MIP has launched Kapi Project (Gate) in Mersin in parallel to EMH2. The Gate project is a multistakeholder project to resolve traffic impact of port operations. “Kapi Projesi - Gate Project” will be implemented concurrently with the extension project. With this project, the port traffic will be separated from the city traffic and the waiting times for the trucks will be shortened.</p>	<p>Expenses related to the project will be covered by MIP.</p>
D. Stakeholder Engagement Activities for PAPs	<p>Min. 21 PAPs</p> <p>Tour boat owners and employees</p> <p>There are 6 tour boats operated by approximately 25-30 PAPs.</p> <hr/> <p>12 PAPs</p> <p>Owners (Members of the Agency Cooperative) and employees of agency boats.</p> <hr/> <p>Mobile vendors – 19 PAPs</p>	<p>Information materials, activities, catering, etc. expenses will be covered by MIP</p>

	Owner and employees of the Park Café – 12 PAPs	
E. Corporate Social Responsibility (CSR)	Relevant stakeholders and users of Ataturk Park Relevant local and regional stakeholders including vulnerable persons/groups in Akdeniz District Relevant local and regional stakeholders including vulnerable persons/groups in Mersin Province	Targeted CSR projects will be developed and implemented during construction phase.
F. LRP Monitoring and Audit	External monitoring framework to be agreed with the independent consultants and Lenders Internal monitoring to be done by the Project Personnel Corporate Communication team. A completion audit will be conducted by independent experts to be commissioned by the Project Company at the end of LRP implementation (end of third year of the operation of the Capacity Extension Project).	

11.2. Business Plan

Implementation of LRP will start with Lenders' approval of the LRP and continue until the end of third year of the operation of the Capacity Extension Project.

After the completion of the third operational year, the Project Company will continue implementing the Project-specific CSR activities.

A completion audit will be conducted by independent experts to be commissioned by the Project Company at the end of LRP implementation (end of third year of the operation of the Capacity Extension Project).

The Project Schedule

The Project schedule is given below.

- EMH2 Construction: Q2 2022 – Q1 2025 (approximately 30 months)
- Dredging Work: Q2 2022 – Q4 2022 (approximately 6 months)
- New Dining Hall Construction: Q2 2022 – Q2 2023 (approximately 12 months)

Detailed breakdown of the construction works will be defined by the contractors.

The implementation time frame of the works according to their subjects is given below.

Table 11-2. The implementation Time Frame of the Works

Works	Construction Period			Transition Operation Period	Operation Period
	1-12 Month	13-24 Month	25-30 Month	31-36 Month	37 + Month
LRP Implementation					
LRP Implementation	X	X	X	X	
Livelihood Restoration Assistance for Agency Boats		X	X	X	X
CSR Activities	X	X	X	X	X
Stakeholder Engagement Activities for PAPs	X	X	X	X	X
Monitoring and Audit					
External Audit (Once a year)	X	X	X		
Completion Audit				X	
Construction Works					
Dredging Work	X				
EMH 2 Construction	X	X	X		

Kapi Project	X
New Dining Hall Construction	X

12. Annexes

12.1. Project Area Maps



Figure 12-1: Project area with expansion

12.2. MIP and Agency Boats Meeting Minutes



Meeting Notes with COMPANIES

Company ID

Company name	Mersin Port Agency Boat Association SS Mersin Deniz Yolcu Taşıma Kooperatifi (Mersin Acenta Motorları Gemi Servis İşletmeciliği Ltd Şti)
Company address	
City / country	
Telephone numbers	
Contact persons and positions	
MIP Follow-up team member	

Meeting minutes

Attendees from Company	Mert SAÇLI – Partner 05368465000 m.saccli@mersinacentamotorlari.com  İlyas AYANA – Head of Association / Partner 05352757539 ilyasayana@gmail.com 
Attendees from MIP	Savaş ÇAKMAK – Marine Services Manager scakmak@mersinport.com.tr  Necdet AKSOY - Project Director naksoy@mersinport.com.tr  Serkan MAHMUTOĞLU - Project Manager 05398189655 smahmutoglu@mersinport.com.tr 
Meeting date and time	3 rd of March, 2021
Meeting place	MIP Management Meeting Room
Main reason of visit	EMH II Expansion Project

NOTES

1. The meeting was opened by PD's brief entrance about the project. He provided an overview of the project including why the project is needed, what the project entails, the benefits of the project, efforts of MIP to improve the interaction of the port with the city, and the current shortcomings in communication and collaboration with the City. Project phasing is explained.
2. There has been formal request by the Association to the Customs and to the Harbor Master. The request was not answered. Association will send a copy of the correspondence to MIP. New request will be made by the Association.
3. Average and maximum number of trips were discussed. Documentation for trip justification will be provided by the Association.
4. First alternative of utilizing the western side of the to-be-build EMH2 berth was discussed. The advantage of this location includes closer proximity to the port entrance and vessels.
5. As a second alternative Çamlıbel location was discussed. Association said there might be additional trip needed to exit from custommed area.
6. Third alternative is use of K-11 berth. However, this is being used commercially, prone to wave agitation with limited availability requiring several boats to be located elsewhere.
7. First alternative seemed to be preferred by both sides.
8. Meeting was concluded.

12.3. Project Impacts Summary table

Potential Impacts	Stakeholders to be Impacted	Baseline and Expected Impact	Impact Type	Impact Period	Mitigations
Livelihood impact on tour boats	Min. 21 PAPs Tour boat owners and employees	<p>Baseline</p> <p>There are 6 tour boats operated by approximately 25-30 PAPs. Tour boat owners and employees have a low education level. They do not have awareness or knowledge on port rules, national or international sea laws and rules etc.</p> <p>There are an average of 5 employees per boat. In winter generally 3 boats operate on a daily basis. In summer the number of boats increase to 6. The boats are registered to Ministry of Turism as tour boats. They anchor 50m apart in Ataturk park. However, there is no official permit granted for their operation.</p> <p>Construction Period Impacts</p> <p>The departure points of the boats are on the edge of Ataturk Park and their passengers are the people who visit the park. In case that there is a need for them to change their departure location due to Project construction, there may be a decrease in the number of passengers. According to MIP, the port will be expanded 130 meters along the park. But there will be no construction on the land side of the park, so there will be no change in these departure locations.</p> <p>Construction works (noise, dust, closing some part of the park to pedestrians etc.) may cause decrease in the number of park visitors, i.e. tour boat passengers.</p>	Permanent	Construction Operation	<p>Pre-construction</p> <p>MIP will inform tour boats face-to-face to address their concerns about:</p> <ul style="list-style-type: none"> Planned breakwater distance, dredging vessels activity in the Project, how much the Port will expand and how this will impact the tours etc. <p>Construction</p> <p>Monitoring during the construction (number of the tours in a day especially in summer season)</p> <p>MIP strongly emphasizes that there will be no increase in port traffic during the construction. On the contrary, a decrease in number of the ships is expected due to construction in the port.</p> <p>The construction is within existing MIP borders and there will not be any interference with their departure locations</p> <p>Construction and operation</p> <p>SEP and info on grievance mechanism</p> <p>Operation</p> <p>MIP will facilitate training of boat captains with Ship Traffic Services on traffic management and safety within Port.</p>

Potential Impacts	Stakeholders to be Impacted	Baseline and Expected Impact	Impact Type	Impact Period	Mitigations
		<p>Operation Period Impacts</p> <p>A tour takes approximately half an hour. The number of daily tours varies between 10-12 in summer season. The Project may affect the tour duration due to the ship traffic. Larger ships will come to the port which may cause the decrease in tour number in a day. Coast Guard Command confirmed that there is such risk for tour boats in the operation period. On the other hand, MIP stated that the Ship Traffic Services Directorate is responsible for port traffic and tour boat captains are required to follow port traffic continuously on Channel 11. However, the awareness of these boats is low on traffic management and their daily tours pose risk to traffic even under current operations.</p>			<p>(As for the operation period, MIP states that coming of larger ships will not impact tour numbers in a day. Larger ships use the port currently and tour boats arrange their tour period accordingly. There will be no change in the current route. This is confirmed by Port Authority.</p> <p>On the other hand, it is not legal that tour boats use the port area for touristic purpose. They have to obey by the rules set by port authority and MIP.</p>
<p>Physical and economic displacement impact on agency boats</p>	<p>12 PAPs</p> <p>Owners (Members of the Agency Cooperative) and employees of agency boats</p>	<p>Baseline</p> <p>There are 7 agency boat companies operating under a cooperative for management and operation of services. Cooperative decides on the number of boats that will be providing service. 7 PAPs own the boats, 12 PAPs work on these boats. The boats have to operate from a port with customs. There are 2 boats that operate on a daily basis from the port. The boats are allocated a rotational</p>	<p>Temporary</p>	<p>Construction (18 months)²⁷</p>	<p>Pre-construction</p> <p>MIP organized a meeting with the agency boats owners on alternative locations. Both parties agreed to a location within existing port; this location needs to be approved by Harbour Master. If this location is approved by Harbour Master, there are no additional costs that will be incurred by boat operators. MIP will follow up on official relocation of agency boats ²⁸</p>

²⁷ Total construction period of the Project is 30 months but current location of agency boats will be impacted after the first 12 months.

²⁸ See footnote 20.

Potential Impacts	Stakeholders to be Impacted	Baseline and Expected Impact	Impact Type	Impact Period	Mitigations
		<p>service by the cooperative, so that there is an uninterrupted 7 day 24 hour service.</p> <p>Construction Period Impacts</p> <p>During construction phase of the Project, the pier used by these boats will be used in extension and will be filled up. Therefore, these boats have to be relocated elsewhere. If the new location provided for them is not within the existing Mersin Port, main risks faced by agency boats are</p> <ul style="list-style-type: none"> • increase in fuel costs due to longer route to provide service; • if they are located to a non-custom port, there will be increase in costs and time-delays to clear customs, since they have to operate through customs. Their route will extend, as they will first go to customs, receive their approval and then go to ships to provide their services. <p>There is a possibility that MIP will provide them a smaller place in the port for the construction period, i.e. a place not for 7 boats but for 2 boats. In this case, the Agency Coop. will have to change their operation according to 2 boats (change in shifts, employee numbers, wages etc.)</p>			<p>MIP will hold a meeting with the participation of all interested/responsible parties (Mersin Port Authority, Customs Directorate, Agency Boats Cooperative) to find a solution about the new location for agency boats. This solution should be acceptable to the cooperative.²⁹</p> <p>Construction</p> <p>In case the boats are moved outside of the port area during the construction period³⁰, MIP will compensate agency boats by paying their additional fuel expense due to their new location during the construction period.</p> <p>During the construction period, as long as the agency boats are out of the MIP, MIP will only be responsible for paying the additional fuel and rental/mooring costs per voyage of 7 boats.</p> <p>Necessary information about the relevant Project activities will be shared with the Cooperative by MIP regularly.</p> <p>Active grievance mechanism</p>

²⁹ MIP held a meeting with agency boat representatives on 3rd March 2022, after this impacts report was presented to them. Participants of the meeting agreed that MIP will provide location for agency boats in the western side of the to-be-build EMH2 berth. According to the meeting minutes signed by both sides, the advantage of this location includes closer proximity to the port entrance and vessels. Also, it was decided that the Association will be made a request to the Customs and Port Authority to complete the official process for this new location.

³⁰ Construction period will take 30 months. After the first 12 months of the Project, it has been planned to take out the agency boats out of the port. MIP informed the agency boats that they will be provided a location in the operation period. In case the agency boats are taken out of the port, it is possible for the boats to have additional expenses which will negatively impact their livelihood for 18 months.

Potential Impacts	Stakeholders to be Impacted	Baseline and Expected Impact	Impact Type	Impact Period	Mitigations
		<p>Operation Period Impacts</p> <p>No impact is identified for the operation period</p>			<p>MIP will provide location in the western side of the to-be-build EMH2 berth. The meeting minutes was signed by MIP and agency boats representatives.</p> <p>The new location in the MIP area will not increase the costs of agency boats. On the contrary, it will be more beneficial than the current location due to its shorter distance to the ships.</p> <p>Operation</p> <p>MIP guarantees that agency boats will be provided a place in the port area in the operation period.</p> <p>Active grievance mechanism</p>
<p>Decrease of income of vendors and businesses in the park</p>	<p>Stationary vendors – 19 PAPs</p> <p>Owner and employees of the Park Café – 12 PAPs</p>	<p>Baseline</p> <p>There are 19 stationary vendors in Ataturk Park who were located in their current locations in the park by the Municipality. They have to be in the same location every day.</p> <p>Construction Period Impacts</p> <p>During scoping field, potential for decrease in the visitors of the Ataturk Park due to construction works of the Project (dust, noise, vibration etc.) was identified.</p> <p>LRP field revealed that stationary vendors do not expect any decrease in park visitors. They did not experience such impact in previous construction. They believe park</p>	<p>Temporary</p>	<p>Construction</p>	<p>No significant impact</p> <p>Monitoring through SEP</p> <p>Putting kiosks for information sharing about the Project with park visitors</p> <p>Active grievance mechanism</p>

Potential Impacts	Stakeholders to be Impacted	Baseline and Expected Impact	Impact Type	Impact Period	Mitigations
		<p>will continue to be visited as long as it is open to public and there are no restrictions for access to park.</p> <p>Operation Period Impacts</p> <p>Based on the all consultations made with institutional stakeholders and 4 stationary vendors located closest to the MIP, it is not expected an impact on stationary vendors for the operation period.</p> <p>There will be no impact on mobile vendors because they do not have a fixed location in the Park, they can make sale in another parts of the whole coast and Park.</p>			
<p>Shortening of the main breakwater by 100 m leading to may increased waves and potential damage to boats in Camlibel Port</p>	<p>Amateur Fishermen's Association (AFA), and Restaurant boats and AFA members around 2000 members, and 375 boats.</p> <p>Camlibel Port are stationary restaurant boats</p>	<p>Baseline</p> <p>Shortening of the main breakwater by 100 m leading to may increased waves and potential damage to boats in Camlibel Port</p> <p>Construction Period Impacts</p> <p>During construction, increased waves in port entry and exit, as after construction waves will be mitigated by expansion.</p> <p>Operation Period Impacts</p> <p>If the Camlibel Port Project proceeds, there will be no impact of the MIP project to AFA and other users of this port.</p>		<p>Construction</p> <p>Operation</p>	<p>Pre-construction</p> <p>MIP has already committed to restoring their breakwater should AFA attain necessary permits. MIP has also prepared formal application letters to be signed by AFA, to assist them in application to permits.</p> <p>Construction</p> <p>Reconstruction of AFA's breakwater will mitigate potential increased wave damage.</p> <p>The construction will be done by MIP</p> <p>Monitoring of breakwater construction</p> <p>Monitoring through SEP</p> <p>Active grievance mechanism</p>

Potential Impacts	Stakeholders to be Impacted	Baseline and Expected Impact	Impact Type	Impact Period	Mitigations
		No important impact is identified for the operation period.			<p>Operation</p> <p>Construction of Camlibel Port will mitigate potential increased wave damage</p> <p>Camlibel Port is a multistakeholder project led by AYGM. The Port will be construct by Akdeniz Municipality, AYGM and The Director of Provincial Environment and Urbanization Ministry</p> <p>Monitoring through SEP</p>
The Management of Cumulative impacts of 'Kapi-Gate' project	Impacted persons and institutions by lorry traffic because of the extension port	<p>Baseline and Construction Period Impacts</p> <p>The Kapi (gate) project, developed by MIP and supported by all public stakeholders, is critical for EMH2, since the capacity of the port will increase from 2.6M TEU to 3.6M TEU, with lorry traffic increasing accordingly.</p> <p>"Kapi Projesi - Gate Project" will be implemented concurrently with the extension project. With this project, it is aimed to separate the port traffic from the city traffic and to shorten the waiting times for the trucks. For the project, MIP cooperates with other project stakeholders (Mersin Governorship, TCDD, General Directorate of Highways, State Hydraulic Works, Mersin Metropolitan Municipality, Akdeniz Municipality, Naval Forces Command, National Real Estate, Veterinary Medicine, Coast Guard, and other stakeholders). If this project is implemented, Gate B will be for container gate out, and Gate C will be completely closed. Trucks entrances and exits will be connected directly to gate D via a 12-lane road and no truck entry and exit will be made from other gates.</p>	Permanently	<p>Construction</p> <p>Operation</p>	<p>Pre-construction</p> <p>The Kapi (gate) project, developed by MIP and supported by all public stakeholders.</p> <p>Cooperating and coordinating communication with the key stakeholders</p> <p>Monitoring and reporting project developments</p> <p>Construction</p> <p>To construct new building for for the Directorate of Agriculture and Forestry by MIP</p> <p>To support financial costs of the Project by MIP</p> <p>Monitoring and reporting project developments</p> <p>Monitoring through SEP</p> <p>Active grievance mechanism</p> <p>Operation</p> <p>Monitoring through SEP</p>

Potential Impacts	Stakeholders to be Impacted	Baseline and Expected Impact	Impact Type	Impact Period	Mitigations
		<p>The Kapı Project entails the demolition of a building housing the Provincial Directorate of Agriculture and Forestry. The Project is being coordinated by the Governor and is expected to follow National legislation. Governor will assign a new place for the Directorate of Agriculture and Forestry. Land delivery for Kapı Project is not within the responsibility of MIP</p> <p>Operation Period Impacts</p> <p>No important impact is identified for the operation period. The Project will be implemented in operation period.</p>			<p>Active grievance mechanism</p> <p>To implement project activities during the operation period</p>

12.4. Field Meetings Minutes

Agency Boats Cooperative and Company

Stakeholder Interviewed: Limited Responsible Mersin Passenger Transport Cooperative and Mersin Agency Boats Ship Service Management Company Partners and Board Members

Interview Date: 02/03/2022

Person/s Interviewed:

İlyas Ayana – Cooperative President and Head of the Company
Ahmet Aşrak – Cooperative Member and Partner in Company
Ahmet Oktay – Cooperative Member and Partner in Company
Mehmet Saçlı – Cooperative Member and Partner in Company
Mithat Saçlı - Cooperative Member and Partner in Company
Mert Saçlı - Cooperative Member and Partner in Company
Saim Saçlı - Cooperative Member and Partner in Company

Participants:

Gökhan Metin (SRM Consulting)
Mihriban Demir (SRM Consulting)
Bahar Ege (SRM Consulting)
Sadık Avcı (SRM Consulting)

Activities

- They have been operating since 1980. They established the cooperative in 1992 and became a company in 2014. Cooperative and company partners are the same person and have known each other for 42 years.
- Total number of members is 7 people.
- It is carried out in the form of family business. There is a business approach that is passed from father to son.
- They provide logistics support, personnel change, ship arrival control, patient and injured exits, sampling, supplies and technical material etc. needs of ships in Mersin port area.
- They do not have services for the container ships. It is estimated that 40% of future ships should be dry cargo ships so that their operations are not affected during the operation phase.
- They provide service at the pier No. 1 within MIP
- They serve with a total of 7 boats, 4 of which are made of metal sheet and 3 of which are wooden. Boat capacities vary between 2-15 tons.
- 24 hours service is provided. There are 2 on-duty workers left at night.
- Offices are in Güven Business Centre outside the port. 2 of the total employees are women and 10 are men.
- The number of boats operating at the same time is usually 2 during the day. 6-7 boats have never sailed at the same time.

The Number of Employees

- The number of employees is 12, including the cooperative partners (7 + 5 person). There are 2 people working on each boat.
- Employee wages vary between 5-7 thousand TL net. Insurance and meal costs per employee vary between 4-5 thousand TL on average.

Other Businesses

- In accordance with the legislation, they are required to serve in the bonded area. They held meetings with the Customs Directorate, MIP and Mersin Port Authority regarding the issue. However, the new location where they will operate has not been determined.
- Apart from MIP, companies such as MESDAŞ, POAŞ and ATAŞ operate in the port. However, there is no expectation or thought that these businesses will show a place.
- Apart from them, the Customs has 2 boats, the Coast Guard has 2, the Narcotic has 1, the Marine Police has 1 boat and they operate in the port area.

Main Income and Expenses

- The biggest expense is fuel. An average of 5 liters of fuel is consumed in half an hour of work. An average of 10 liters of fuel is consumed per trip.
- They did not want to share the accounting information showing their annual income and expenses because they are company-specific information.
- They avoided giving information about their income.
- They make an average of 3-4 trips a day, an average of 20-21 trips a week, an average of 100-120 trips a month.

Stakeholder Engagement and Disclosure

- A meeting was held two months ago by MIP Naval Operations Manager Savaş Çakmak and they were informed about the work to be done.
- 6 months ago, MIP conducted an interview with them and informed them about the project.

Impacts of Port Expansion in 2015-2016

- Neither the agency boats nor the tour boats were affected.

Opinions and Concerns about the Impact of the Project

- It has been stated by MIP that they may have to leave the port during the construction period. In this case, they may have to go to a non-customs area, since the alternatives for an area that will remain within the customs area are very limited.
- The closest alternative to the non-customs area is Çamlıbel Fisherman's Shelter. However, they are concerned that if a Project to construct a marina or boat docking centre etc. is started, they may not be able to use that area during the construction period of the project.
- If they are placed in Çamlıbel Fisherman's Shelter, there will be an increase in fuel costs. Estimated fuel cost will increase by 500 TL per trip on average. Approximately 5 liters of fuel is used in 10 minutes. One trip takes about 60 minutes. Accordingly, they foresee an additional 30 liters of fuel cost per trip.
- If they put their boats in a non-customs area, they will have to enter and exit the customs area every time in order to provide service, which will extend the service period and make it difficult for them to provide service. In case of emergencies such as illness and accident, it will be difficult for them to reach the ships early.
- The price they will pay to National Real Estate Department for the mooring place in Çamlıbel will be added to this cost.
- Since there is no protective breakwater in the Çamlıbel Fisherman's Shelter, they are worried that their ships will be damaged by the waves in the storm.
- Another alternative is to use Mersin Marina. However, they do not prefer this place because the marina is 6-7 km away, which will approximately double their fuel costs. In addition, they will have to pay rent for the marina. They had a meeting with Mersin marina, but they were informed that there is no place at the moment.

Requests and Recommendations

- Since a non-customs area at the MIP port will increase their costs, they want to be shown a place in a bonded area from the MIP port area during the construction period. As a suggestion, they proposed the Little 11 berth in the MIP. If this area is not suitable, they are also willing to have another area.
- They want to be accommodated at the MIP port during the operation period and to continue their activities.
- They stated that they would be pleased to be supported to reduce the additional costs during the construction in case it is a non-customs area.
- They want to be able to benefit from the services of MIP (office in the port, cafeteria, electricity, etc.) to facilitate their work.

Akdeniz Municipality

Stakeholder Interviewed: Akdeniz Municipality

Interview Date: 02/02/2022

Person/s Interviewed:

Uğur Sözkese – Deputy Mayor

Participants:

Sadık Avcı (SRM Consulting)

Bahar Ege (SRM Consulting)

Emre Duru (Mersin Provincial Directorate of Culture and Tourism)

- There are concerns that the 5 million cubic meters of quarry rock that will come to the port will affect the traffic negatively, and the opinions of the stakeholders/persons who have positive view of the Project may be adversely impacted should the Project's construction increase the traffic congestion. Since MIP will be the most affected party by the problems related to the increasing traffic density, it will be beneficial for the project to offer a solution.
- To solve the problem, it has been proposed by the municipality to create an alternative road without using the existing roads by pulling a 15 m. band parallel to İnonu Boulevard from the area used by MIP itself.
- Amateur fishermen have to file a petition for the repair of the damaged breakwater next to Camlibel Amateur Fishermen's Shelter, and MIP will initiate the repair once the permit is issued.

Akdeniz Region Coast Guard Command

Stakeholder Interviewed: Akdeniz Region Coast Guard Command

Interview Date: 02/04/2022

Person/s Interviewed:

Oğuz Bavbek - Commander

Participants:

Sadık Avcı (SRM Consulting)

Mihriban Demir (SRM Consulting)

Bahar Ege (SRM Consulting)

- The Commander gave information on the roles and responsibilities of the Coast Guard Command in the Mersin Port.
- The ships/boats in the port were damaged severely during the latest storm due to the shortening of the breakwater and the widening of the port entrance.

- An alternative place for agency boats during the construction may be Karaduvar (20-25 minutes away from the port – sea distance). Currently there are other agency boats operating outside the port and Custom Directorate does not fine them because they are in non-customed area. There is a Custom Officer in Karaduvar to make the necessary transactions.
- Tour boats breach the sea traffic line frequently because their captain do not follow the Channel 11 (sea traffic direction channel).
- As larger ships will come to the port after the port expansion, the manoeuvring time of these ships will be longer. This may cause tour boats to wait longer in the port to go on tour. MIP may arrange the transfer of these large ships to be at night to avoid this.

Chamber of City Planners

Stakeholder Interviewed: Union of Chambers of Turkish Engineers and Architects (TMMOB), Chamber of City Planners Provincial Office

Interview Date: 02/03/2022

Person/s Interviewed:

Uğur İnce– Provincial Representative

Participants:

Gökhan Metin (SRM Consulting)

Mihriban Demir (SRM Consulting)

Bahar Ege (SRM Consulting)

- They objected to the project and filed a lawsuit. The litigation process continues.
- They are of the opinion that it would not be appropriate to meet with MIP administrators and participate in activities for information purposes, etc., while the litigation process is ongoing.
- They do not think that Atatürk Park will be affected during the construction process.
- Objections to the project are generally related to the fact that the city will be adversely affected by the traffic during the construction and operation period, the logistics sector of the city will be adversely affected during the operation period, and the implementation of a larger-capacity port project will be halted due to this extension.

Çamlıbel Solidarity Association

Stakeholder Interviewed: Çamlıbel Solidarity Association

Interview Date: 01/02/2022

Person/s Interviewed:

Hüseyin Karlıklı – President

Özkan Demir – Member

Participants:

Sadık Avcı (SRM Consulting)

Gökhan Metin (SRM Consulting)

Mihriban Demir (SRM Consulting)

Bahar Ege (SRM Consulting)

- The Association was established 3 years ago to carry out activities about city planning, culture and art. It has 30 active members from Hamidiye and Kültür neighborhoods mostly.
- The Association has cooperation with MIP, municipalities, and Trade and Industry Chamber.
- The Association and MIP co-organized a concert in Atatürk Park in 2022 to both support cultural events in the city and promote the port expansion project of MIP. Information brochures about the Project were distributed in the concert area. According to the Association, MIP has also pledged to support the rehabilitation and improvement of Atatürk Park.

Kültür and Çankaya Neighborhoods Mukhtars

Stakeholder Interviewed: Kültür and Çankaya Neighborhoods Mukhtars

Interview Date: 01/02/2022

Person/s Interviewed:

Ali Karadeniz – Mukhtar of Kültür Neighborhood

Abdurrahim Saygın – Mukhtar of Çankaya Neighborhood

Participants:

Gökhan Metin (SRM Consulting)

Mihriban Demir (SRM Consulting)

Bahar Ege (SRM Consulting)

- The park is used every day. It is estimated that 2-3 thousand people visit the park every day.
- The park visitors were higher before, but it is stated that the number of visitors decreased after the amusement park was moved to another area.
- In the park, restaurant boats by the sea are fixed and do not sail.
- “Mersin Çamlıbel Sports Centre and Boat Berth Project” will be constructed by the Provincial Directorate of Environment, Urbanization and Climate Change at the location of Çamlıbel fisherman's shelter in the park. "Environmental Impact Assessment Not Required" decision was made on 08.06.2021 for this project.
- Mukhtars were informed by MIP and brochures were given
- It is thought that the park will not be damaged by the activities during the construction and operation period of the project.
- The mukhtar of Kültür neighborhood stated that there may be adverse impact of the project on the tour boats. The reason is shown as the travel of tour boats in the port will be restricted due to ship traffic and port activities.
- As a suggestion, it was stated that the support for tour boats to improve their livelihoods should be provided.

Mersin Chamber of Shipping

Stakeholder Interviewed: Mersin Chamber of Shipping

Interview Date: 02/04/2022

Person/s Interviewed:

Cihat Lokmanoğlu – President

Mesut Öztürk – Secretary General

Participants:

Sadık Avcı (SRM Consulting)

- The interview has taken place on phone because interviewees are going through covid-19 disease.
- The expansion of the port is a necessary condition.
- The activities carried out for the port expansion in 2015-2016 did not have an adverse effect and no adverse effect is expected for the construction activities of the EMH2 Project.

Mersin Customs Directorate

Stakeholder Interviewed: Mersin Customs Directorate

Interview Date: 02/03/2022

Person/s Interviewed:

Ali Bat – Boat Personnel

Participants:

Gökhan Metin (SRM Consulting)

Mihriban Demir (SRM Consulting)

Bahar Ege (SRM Consulting)

- Due to the port expansion, 2 boats connected to the institution will be temporarily taken out of the port during the construction period and services will be carried out from the new location.
- Customs boats are obligated to serve at a place in the customs area.
- Mersin marina is being considered for the new location. Discussions on this issue are ongoing. It has not been finalized yet.
- Agency boats will not be able to serve at the MIP port during the construction period. Çamlıbel Fisherman's Shelter is considered as an alternative location. However, there is no definite place yet.

Mersin Governorship

Stakeholder Interviewed: Mersin Governorship

Interview Date: 02/03/2022

Person/s Interviewed:

Ali İhsan Su – Governor

Participants:

Sadık Avcı (SRM Consulting)

- The MIP EMH2 Project is an important Project for the city of Mersin. The main problem related to the Project was traffic congestion. The problem will be solved with the implementation of the Gate Project. Protocols have been signed all relevant government institutions. All permits related to the Gate Project has been taken. The project will go out to tender soon and construction will begin. The construction is expected to be completed within 12-16 months.
- Due to the construction of MIP EMH2 Project, the Veterinary Border Control Point building will be resettled. There is a stream in the construction area and in addition to the building, a bridge will be constructed by MIP to reach the building. The project plan has been prepared and licensed. The construction will start soon.

Mersin International Port

Stakeholder Interviewed: Mersin International Port (MIP)

Interview Date: 02/01/2022

Person/s Interviewed:

Necdet Aksoy (Project Director)

Sevda Onbaşı (Corporate Communications Manager)

Participants:

Sadık Avcı (SRM Consulting)

Gökhan Metin (SRM Consulting)

Mihriban Demir (SRM Consulting)

Bahar Ege (SRM Consulting)

- Approximately 4000-5000 vehicles arrive at the port daily. With the Gate Project, the trucks coming to the port will not create traffic and the truck traffic will be separated from the city traffic.
- All stakeholders support the Gate Project. The Project is currently progressing.
- Rumors about the expansion of the port towards Atatürk Park for EMH2 Project have been largely wiped out by communication efforts.
- The litigation process regarding the EMH2 project started in March 2021. Mersin Metropolitan Municipality, City Council, Union of Chambers of Turkish Engineers and Architects, and Mersin Friends of Environment Association have negative opinions about the project, and the Metropolitan Municipality has written an objection to the positive expert report on the Project.
- There has been no records of grievances or request with regards to the EMH2 Project in the grievance mechanism.
- Mukhtars has been included in the grievance mechanism. Information brochures were given to them to distribute to the citizens, including the whatsapp line.
- The Gate Project was launched and all stakeholders were invited. Stakeholders, including the Mersin Commodity Exchange, Mersin Chamber of Shipping, Akdeniz Municipality and Secretary General of Mersin Metropolitan Municipality, participated in the launch in October 2021. It has been taken care to keep communication open with Mersin Metropolitan Municipality.
- EMH2 Project construction period is foreseen as 1.5 years. Completion of the litigation process is awaited to start construction. Not starting the construction due to litigation process is a sign of good faith by MIP. At the request of the Ministry of Transport and Infrastructure, the groundbreaking ceremony took place in March 2021.
- Çamlıbel Street Festival was organized by Çamlıbel Solidarity Association, Mersin Metropolitan Municipality and Akdeniz Municipality, and supported by MIP. MIP gave information on the project to the citizens who came to the festival for 3 days. MIP Deputy General Manager stated that they support the position of Atatürk Park and promised to be a supporter of the activities to be organized in the park.

Mersin Metropolitan Municipality

Stakeholder Interviewed: Mersin Metropolitan Municipality

Interview Date: 02/03/2022

Person/s Interviewed:

Hasan Gökbel – Assistant Secretary General
Ali Rıza Öztürk – Assistant Secretary General
Aynur Ata – Head of Department of Financial Affairs

Participants:

Sadık Avcı (SRM Consulting)
Bahar Ege (SRM Consulting)
Emre Duru (Mersin Provincial Directorate of Culture and Tourism)

- The facilities in Atatürk Park, except the Park Cafe, were demolished as a result of the court. As the lawsuit process of Park Cafe continues, the demolition did not take place.
- In 2003, Mersin National Real Estate Directorate allocated the location of Park Cafe for the operation of the Municipality for a period of 10 years. A letter has been written by the facility to the Directorate of National Real Estate regarding the time extension of the contract, but the process has not been followed. As of April 2019, although there was an application regarding the facility during the new mayor's term, the license was not renewed, and the court process started.
- The mobile vendors in Adnan Menderes Park have been licensed, but the license processes of the mobile vendors in Atatürk Park have not been completed yet.
- Mersin Metropolitan Municipality has received temporary permission from National Real Estate Directorate regarding Atatürk Park and is in a 2-year pre-allocation process. Before the temporary permit, Atatürk Park was damaged by the waves, and the Municipality made repairs in the green area. Repairs are made for every place open to the public, and arrangements are also made in the concrete part of the park. Recently, a letter was written to the Directorate of National Real Estate about the regulation project, and it was stated in this letter that the project implementation period could exceed the pre-allocation period of 2 years. Preparations are being made for the regulation project, and it is desired to initiate the project in line with the consultations with the Directorate of National Real Estate.
- The Ministry of Transport and Infrastructure has started working on the Camlibel Marina Project.
- The Metropolitan Municipality carried out the plan revisions of the Gate Project 2 years ago. The project will go out to tender within this year.

Mersin Port Authority

Stakeholder Interviewed: Mersin Port Authority

Interview Date: 02/01/2022

Person/s Interviewed:

Murat Harun Baştürk (Port Master)

Participants:

Sadık Avcı (SRM Consulting)

Gökhan Metin (SRM Consulting)

Mihriban Demir (SRM Consulting)

Bahar Ege (SRM Consulting)

Sevda Onbaşlı (MIP Corporate Communications Manager)

Emre Duru (Mersin Provincial Director of Culture and Tourism)

- Issues such as the registration procedures of tour boats, how many passengers they can take, their fields of activity, and where they will stop are handled by the Port Authority. The activities of the boats related to the restaurant operation are subject to the permission of the Municipality.
- There are 6 tour boats. The tour boats travel to and from the harbour entrance and making short tours.
- Tour boats operate on demand, depending on sea and weather conditions. There is no constant demand for their work. They operate more frequently in the Spring and Summer months.
- The area where the port will expand is the bonded area. The tour boats are not related to the port. Therefore, the EMH2 Project will not affect the tour boats. Dredging/filling activities will not have an impact on tour boats.
- The tour boats have high decibels due to the music they play. Hence, the construction noise will not affect tour boats.
- The tour boats pick up passengers from the Atatürk Park. Normally they have to pick up passengers from a pier, but there is no pier.
- The agency boats carry out their operations by leaving and returning to the customs area. They provide services to foreign flagged ships in activities such as captain, personnel, patient, and food delivery.
- During the construction, the agency boats will be able to use their current berth. The Customs Directorate must agree to the appropriateness of the berth space shown for the agency boats to operate. The departure of agency boats outside the bonded area and their departure after arriving in the bonded area will hinder the trade axis. For this reason, they have to leave from a place that is bonded or from a place where a bonded area can be created. There are also conditions for establishing a bonded area.
- The cooperative of the agency boats is in communication with the Port Authority. There has been no meeting between the Port Authority and the Customs Directorate regarding the place to be shown to the agency boats during the construction of the EMH2 Project.
- The Port Authority is also in contact with tour boats and related NGOs regarding existing projects of MIP. MIP provides information to the Port Authority. There is good communication between MIP and the Port Authority.
- Çamlıbel Marina Project is being built.
- With the M.I.P EMH2 project, 1,600,000 additional containers will enter the port annually, a project that will positively affect the city of Mersin. The project will also create employment.
- There are fixed restaurant boats in Çamlıbel. These boats are affected by waves. They want abreakwater. These waves were present without the breakwater being damaged, but their number was not high. Consultations on the repair of the damaged breakwater are continuing.
- The construction of a new breakwater has been discussed within the scope of Çamlıbel Marina Project.

- Dredging study will be completed in approximately 3.5-4 months. It will not have any effect on port traffic. The modeling of the study was done by Dokuz Eylul University. If necessary, the emergency action plan can be revised.

Mersin Provincial Directorate of Agriculture and Forestry

Stakeholder Interviewed: Mersin Provincial Directorate of Agriculture and Forestry

Interview Date: 02/02/2022

Person/s Interviewed:

Arif Abalı (Director)

Mustafa Nevzat Zaim (Deputy Director)

Participants:

Sadık Avcı (SRM Consulting)

Bahar Ege (SRM Consulting)

Emre Duru (Mersin Provincial Directorate of Culture and Tourism)

- The Veterinary Border Control Point building will be demolished, and another building will be constructed and given to them by MIP.

Mersin Provincial Directorate of Culture and Tourism

Stakeholder Interviewed: Mersin Provincial Directorate of Culture and Tourism

Interview Date: 02/04/2022

Person/s Interviewed:

Emre Duru – Director

Participants:

Sadık Avcı (SRM Consulting)

Gökhan Metin (SRM Consulting)

Mihriban Demir (SRM Consulting)

Bahar Ege (SRM Consulting)

- The MIP EMH2 Project will not have an adverse impact on tourism. The expansion of the port will not have an adverse effect on the city of Mersin.

Mersin Provincial Directorate of Environment, Urbanization and Climate Change, Department of National Estate

Stakeholder Interviewed: Mersin Provincial Directorate of Environment, Urbanization and Climate Change, Department of National Estate, Directorate of Akdeniz Real Estate

Interview Date: 02/01/2022

Person/s Interviewed:

Sertan Köylü (Director of Akdeniz Real Estate)

Participants:

Sadık Avcı (SRM Consulting)

Gökhan Metin (SRM Consulting)

Mihriban Demir (SRM Consulting)

Bahar Ege (SRM Consulting)

Sevda Onbaşlı (MIP Corporate Communications Manager)

Emre Duru (Mersin Provincial Director of Culture and Tourism)

- Atatürk Park and fisherman's shelter are owned by the National Real Estate Department. Atatürk Park is at the stage of pre-allocation to the Metropolitan Municipality. A full allocation will take place if certain conditions are met. The municipality should not rent out the allocated places for commercial activities. In order to carry out commercial activities, it is necessary to obtain permission from the National Real Estate Agency.
- The ownership of the area where MIP operates also belongs to the National Real Estate Department. Easement right is given to MIP through a rental agreement.
- It is necessary to obtain permission from the National Real Estate Department when the filling materials enter the port. The fee for the permit and the approval of the ministry must be obtained.
- The cafe operating in Atatürk Park has a lawsuit process with the Metropolitan Municipality.
- Mersin Congress and Exhibition Centre is on a separate parcel. The metropolitan municipality has the right of easement, and compensation is paid for it.
- The National Real Estate Department has information about the EMH2 Project, and has information about the filling activity to be carried out in the sea within the scope of the project. The National Real Estate Department gave official permission for the construction activities and a zoning plan has been prepared. Currently, the project is in the pre-authorization period. During the construction period, the permit period will be applied. The permit period will start with the approval of the Ministry of Environment, Urbanization and Climate Change.
- The tour boats will not be affected by the studies to be made within the scope of MIP EMH2 project. In construction studies, the manoeuvres of ships will be affected for a temporary period. However, all manoeuvres of ships are in the control of the port authority officials.

Mersin Veterinary Border Control Directorate

Stakeholder Interviewed: Mersin Veterinary Border Control Directorate

Interview Date: 02/02/2022

Person/s Interviewed:

Mehmet Sait Deđer – Director

Participants:

Sadık Avcı (SRM Consulting)

Bahar Ege (SRM Consulting)

Mustafa Nevzat Zaim (Deputy Director)

Emre Duru (Mersin Provincial Directorate of Culture and Tourism)

- The Veterinary Border Control Point works under with the Ministry of Agriculture and Forestry.
- The Veterinary Border Control Point building will be demolished and a new 2-storey building with 1300 m2 closed area will be built in its place. The 19-decare land on which the building will be built is the ministry's land. The Ministry has accepted the use of the land. Building licence has been obtained from Akdeniz Municipality.
- In the building; a control unit, a weighbridge, and a paddock for 500 animals will be located.

Tour Boat Owners and Employees

Stakeholder Interviewed: Tour Boat Owners and Employees

Interview Date: 02/02/2022

Person/s Interviewed:

Ecevit Eryürekler - Troys Tour Boat Owner
Yaşar Eryürekler - Baba Ahmad Tour Boat Owner
Ali Yüzgeç - Seyhan 2 Tour Boat Owner
Adnan Dilgöl – Captain Adnan and Adnan VIP Tour Boat Owner
Cumali Demir – Captain of Tour Boat
Troys Tour Boat 2 Employees

Participants:

Gökhan Metin (SRM Consulting)
Mihriban Demir (SRM Consulting)
Bahar Ege (SRM Consulting)

- Interviews were held with 4 out of 6 tour boats.

Activities

- They operate every month of the year.
- Most work takes place on weekends and during the summer months.
- 3 of the boats also provide restaurant service with alcohol. In the evening they provide a one-hour cruise and mooring service.
- The departure points of the boats are on the edge of Atatürk Park. A space of 50 meters is left between each boat to avoid customer quarrels. These departure places are not official and legal places. Departure times are random, dependent on passengers and occupancy.
- The number of customers is increasing gradually with the month of April. There are customers until October. The months with the least number of customers are between November and March.
- A tour takes approximately half an hour.

Employees

- Businesses are carried out as a family profession.
- The workforce consists of same family members. In general, there is a wage scale based on daily wages. It varies between 100-200 TL per day. The distribution of wages is mostly based on revenue.
- It is obligatory to have an official captain on board. Therefore, a retired captain is employed. The owner of the two boats is also the captain.
- The number of employees varies between 4-8 people, including the boat owner. In general, 1 or 2 employees are insured, the rest are family members, relatives working per daily wages.

Basic Expenses

- They use Çamlıbel Fisherman's Shelter for anchorage. For this, they pay a mooring fee of 8-10 thousand TL per boat per year to the Directorate of National Real Estate.
- The biggest expense of the boats is the fuel that costs 1000 TL, which they purchase every two days or once per day at peak times. The fuel cost of a half-hour tour varies between 30-50 TL.
- Another major expense item is boat maintenance. In order to take care of the boats, they lay the boats on the stocks in Erdemli and pay a meter fee according to the length of the boat. They do the maintenance themselves. Maintenance costs are made once a year, sometimes every two years. The sled duration does not exceed 30 days. Maintenance costs vary between 10-20 thousand TL per year. The average hull length of passenger ships with a capacity of 100 passengers is 26 meters.

- All expenses, including maintenance costs, personnel costs, fuel costs, mooring fees, etc., are an average of 240 thousand TL per year.

Approximate Income

- In summer, when the customer is crowded, the daily turnover varies between 1000-1500 TL. At the weekend, this amount varies between 3500-5000 TL.
- Buffet service on all boats – tea, beverage, etc. – exists. Tea is 5 TL.
- Although the official fee is 20 TL per person, a variable, informal fee schedule is generally applied depending on the number of passengers and their demand.
- The number of daily tours varies between 10-12.

Impact of Past Port Expansion

- They were not adversely affected by the port expansion in 2015-2016 in terms of tour route. However, they reported that widening the harbour entrance made ships more vulnerable to waves.

Communication with Stakeholders and Disclosure

- Disclosure meeting about the project was carried out only with the captain of one boat, and it was learned that meeting with other boat owners were not held.

Opinions and Concerns About the Impact of the Project

- They think that the project will not affect the route of tour boats.
- They concerns about potential negative impact of the project is that it will affect the tour departure and route return locations due to the ship traffic. They are worried that they will have to wait for the entrance and exit of the large ships approaching the port, so they will have to wait for the tour.
- Another concern is that if a marina or similar work is carried out in the Çamlıbel Fisherman's Shelter, the cruise, mooring areas, etc. areas for tour boats will not be left at all.
- They want to have information about how the port ship traffic will affect the passenger services of the tour boats during the construction and operation periods. This is the biggest concern.
- Another concern is that the waves created by the ships entering and leaving the port may shake their boats and negatively affect the food services.
- There are concerns that the section of Atatürk Park closest to the port will be used as a container yard in the future. If this happens, there will be no passenger pick-up and departure places in the park.

Requests and Recommendations

These requests and recommendations are not about realizing all of them, but about making one of them alternatively.

- By arranging the harbour entrance, ensuring the navigation of ships entering and leaving the boats from a farther point,
- Arranging the port traffic on the tour route in such a way that they do not affect the tour return place, ensuring that the departure places in Atatürk Park are not affected by the project,
- Providing support for allocating a place for them in Mersin Marina,
- Providing support on boat storing location for maintenance and National Real Estate adequate fees,
- The construction of a breakwater for Çamlıbel Fisherman's Shelter.

TRT Çukurova Directorate

Stakeholder Interviewed: TRT Çukurova Directorate

Interview Date: 02/03/2022

Person/s Interviewed:

Sebahattin Kahraman – Director

Participants:

Sadık Avcı (SRM Consulting)

TRT building is located next to the MIP. The noise pollution is disturbing the directorate. Therefore, the Directorate of TRT Çukurova is requesting a new building to be constructed by MIP and to move to this building. MIP declined this request, stating the building location is outside its area of operation.

MIP responds that this recommendation is the personal opinion of the TRT Regional Manager. The General Directorate of TRT has no opinion or expectation on the subject.

12.5. Questions

a. Tour Boats

- 1) Who is the owner of the boat?
- 2) Is the boat operated by an agency or the owner?
- 3) What is the current tour route?
- 4) What is the daily/monthly boat income? What are the main expenses? (How much fuel is used in a tour?) How many tours per day are required to make profit (to get the employee and fuel expenses)?
- 5) What is the current number of tours and passengers of tour boats per day?
- 6) Does the number of tours, boats change according to the season?
- 7) How long is the tour? Does the tour duration vary? (Short-long, with-without food) Does the cost of the tour change depending on whether it is with or without food service?
- 8) Are the 2022 tour prices determined? Who determines the tour prices?
- 9) Is there a night tour?
- 10) What is the number of personnel employed on tour boats (by gender)? Is there a seasonal change in the number of personnel?
- 11) Is there a possibility to change the route for tour boats? How does the licensing process work? What is the scope of the license obtained?
- 12) Were they operational in the first expansion of the port (2015-2016)? If they were in operation, did the construction have an impact on their business at that time?
- 13) Have they been informed about the project? If yes, how was the information provided? By whom was the information provided?
- 14) What kind of a change in the route is predicted with the project? How does this change affect the number of passengers and income of tour boats?
- 15) Question to boat personnel: What are your wages? (Monthly/Daily/Per trip) Are social security payments paid? Are there any delays in wages?
- 16) Is there anything else you would like to add?

b. Agency Boats

- 1) Who are the owners of/Which company owns the agency boats?
- 2) How many companies are there in the port that offer this service?
- 3) How many boats do they serve daily/weekly? What is the average income?
- 4) What is the number of personnel employed on the boat (by gender)?
- 5) Could you give information about the working season (Does the working time increase in the summer season?)
- 6) Which days of the week do you they serve? How long is the daily working/service time? How many personnel change do they have per day? (Do you work in shifts)
- 7) Will you be affected by the demolition of the building where the changing rooms and cafeteria are located? Do you currently using that building?
- 8) Have you been informed about the project? What are your thoughts on the potential impacts of the project? Do you have any solution suggestions?
- 9) Would being in a different place at the port during the construction period hinder your services? Do you have any preferred location or suggested place?
- 10) Where will you continue your services after the construction is completed?
- 11) Is there anything else you would like to add?

c. Cafes Located in Ataturk Park

- 1) In which season are the cafes open? (Is it always open or seasonal?)
- 2) What is the average number of customers per day in the cafe?
- 3) How much is the café's monthly revenue? How much are the monthly expenses?

- 4) How much rent do they pay monthly/yearly?
- 5) Could you give information about the number and gender of the personnel employed in the cafe?
- 6) How do they describe Ataturk Park where the cafe is located in/neighbour to? (secure, insecure, family place etc.)
- 7) Do they have a relationship/communication with MIP?
- 8) Have you been informed about the project? If yes, what are the potential impacts of the project on the business?
- 9) Were you affected by the construction of the first expansion period? Were there effects such as a decrease in sales, a decrease in the number of park visitors?
- 10) Is there anything else you would like to add?

d. Mobile Venders Selling in Ataturk Park

- 1) Could you please tell us about yourself. (age, background, migrant/local)?
- 2) Are you head of the family? If yes, how many people are there in the household? (How many people is the person responsible for their livelihood and care?)
- 3) Do you pay a certain fee to the municipality or another institution for the mobile sales car? Is there any licensing?
- 4) Is there any other source of income other than mobile vending?
- 5) How long have you been selling at this park?
- 6) Do you always set up your mobile vehicle in the same place or are you mobile? If so, which route do you follow daily?
- 7) How much do you sell per day/week? Does it change seasonally?
- 8) What are your working hours? (Weekends, weekdays? Does it change according to the season?)
- 9) What kind of difficulties do you face as venders?
- 10) Who are the users of the park? Does the user profile change day and night (such as families during the day, single men at night), summer and winter (foreign tourist, domestic tourist)?
- 11) Is there any problem about the security of the park (especially at night)?
- 12) Is there anything else you would like to add?

e. Port Authority

Subject: Boats currently using Project's expansion berth:

- 1) How many boats use the berthing area of the port currently? Could you give information on type of boats, owners (businesses, logistics companies, etc), and overall use of the berthing area?
- 2) Could you give information about the permit/licensing process of the agency boats?
- 3) When the location where the agency boats are moored is closed by the Project, where will you relocate them?
- 4) If other boats are impacted by relocation, where will they be transferred? Are there alternative sites/ports?
- 5) Where will the agency boats be offered as an alternative place during and after the construction?
- 6) Has there been or will there be consultation with businesses impacted on an alternative location? Is Port management the sole decision maker?
- 7) What type of information sharing mechanisms are in place to ensure all impacted companies are informed about the project? How do you convey information?

Tour boats and entry to exit to Port during dredging

- 8) What are the current routes allowed for Tour boats in greater Port Area?
- 9) Will there be a change in the route of tour boats during Project construction especially dredging?

- 10) Will there be a change in the route of tour boats after Project construction? Will Project's expansion limit the tour site seeing route?
- 11) How will the dredging planning be done in the port? How long it will take? How will the announcement be made?
- 12) What are impacts of dredging on Port entry and exit for small scale boats and fishermen?
- 13) There are fishing boats using Camlibel port, that will enter and exit the Port during dredging. Will there be restrictions imposed on Port entry and exit?
- 14) Is there anything else you would like to add?

f. Institutions

- 1) Have you been informed about the project? By whom, how was the information provided?
- 2) What are their thoughts on the potential impacts of the project?
- 3) Have you received any complaints about the Project? If yes, was the complaint resolved?
- 4) Could you give information about the users/visitors of Ataturk Park?
- 5) Question to the Police Department: Could you give information about the security problems in the park?
- 6) Question to the Municipal Police Department: Could you give information about the vendors in the park?

12.6. Field Photos



Photo 1. Meeting with Mersin Port Authority with the participation of Provincial Director of Culture and Tourism and MIP PR Manager



Photo 2. Meeting with MIP and Çamlıbel Solidarity Association



Photo 3. Agency boats in the port area



Photo 4. Agency boats during service to a ship



Photo 5. Interview with owners and employees of Troys and Seyhan 2 tour boats



Photo 6. Owner of Troys Tour Boat – Ecevit Eryürekli



Photo 7. Seyhan 2 Tour Boat



Photo 8. Interview with the Café owner in Atatürk Park



Photo 9. Distance between the MIP dock, a ship in the port entrance and Troys Tour Boat on the tour route



Photo 10. Distance between a tour boat in the departure location, Atatürk Park and MIP port



Photo 11. A mobile vendor in Atatürk Park



Photo 12. Meeting with Agency Boats Cooperative members in the Park Café in Atatürk Park



Photo 13. People walking in Ataturk Park



Photo 14. Meeting with the Coast Guard Command



Photo 15. Meeting with Provincial Directorate of Culture and Tourism



Photo 16. Interview with the mukhtar of Kültür Neighborhood



Photo 17. Meeting with Mersin Provincial Directorate of Agriculture and Forestry



Photo 18. Mobile vendors in Ataturk Park