



**Republic of Türkiye
Ministry of Agriculture and Forestry
General Directorate of State Hydraulic Works**

**Türkiye Water Circularity and Efficiency
Improvement Project (TWCEIP)**

**Land Acquisition
Policy Framework (LAPF)**

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CONTENTS

DEFINITIONS

EXECUTIVE SUMMARY

1. INTRODUCTION

- 1.1. Project Overview
- 1.2. Objectives of the Land Acquisition Policy Framework
- 1.3. Scope of LAPP
- 1.4. LAP Methodology

2. PROJECT DEFINITION

- 2.1. Project Objective
- 2.2. Characteristics of Sub-Projects
- 2.3. Project Location
- 2.4. Project Components
- 2.5. Project Implementation Arrangements
- 2.6. Project Beneficiaries

3. THE LEGAL AND REGULATORY FRAMEWORK IN TÜRKIYE

- 3.1. Applicable National Legislation on Land Acquisition
- 3.2. Applicable National Legislation on Land Consolidation

4. APPLICABILITY OF WORLD BANK'S ESF (ESS5 AND WB POLICY ON ACCESS TO INFORMATION)

- 4.1. Gap Analysis Between the National Legal Framework and World Bank's ESS

5. CHARACTERISTICS OF PROJECT SITES

- 5.1. Overall Characteristics
- 5.2. Details on the Socio-Economic Characteristics of Project Sites
- 5.3. Vulnerable Groups

6. ELIGIBILITY AND CATEGORIES OF AFFECTED PERSONS

- 6.1. Eligibility Principles as per WB ESS 5
- 6.2. Eligibility Criteria
- 6.3. Categories of Project-Affected Persons

7. ENTITLEMENT

- 7.1. Principles on Compensation for Project-Affected Persons as per WB ESS 5
- 7.2. Right to Compensation
- 7.3. Entitlement Matrix

7.4. Calculation of Compensation Payments

8. METHODS FOR THE APPRAISAL OF AFFECTED ASSETS

9. INSTITUTIONAL ARRANGEMENTS

- 9.1. Project Implementation Unit (PIU)
- 9.2. Project Beneficiaries
- 9.3. Contractors
- 9.4. Monitoring and Evaluation Unit
- 9.5. Institutional Capacity

10. CONSULTATION FRAMEWORK DISCLOSURE STRATEGY AND GRIEVANCE REDRESS MECHANISM

- 10.1. Grievance Redress Mechanism Management Procedure

11. MONITORING AND EVALUATION

- 11.1. Monitoring Levels
- 11.2. Monitoring Indicators

12. IMPLEMENTATION PROCEDURE, BUDGET AND TIMEFRAME

13. REFERENCES

ANNEXES

- ANNEX 1** LAND ACQUISITION PLAN REPORTING FORMAT
- ANNEX 2** GRIEVANCE APPLICATION FORM / CLOSURE FORM
- ANNEX 3** SIX-MONTHLY MONITORING REPORT - PROPOSED FRAMEWORK
- ANNEX 4** STAKEHOLDER ENGAGEMENT PLAN

ABBREVIATIONS

DSİ	General Directorate of State Hydraulic Works
ESS 5	World Bank Standards on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
GRM	Grievance Redress Mechanism
KOSKİ	Directorate General of Water and Sewage Administration of Konya
LAP	Land Acquisition Plan
LAPF	Land Acquisition Policy Framework
LC	Land Consolidation
MoAF	Ministry of Agriculture and Forestry
OFDS	On-Farm Development Services
PAP	Project-Affected Person
USD	United States dollars
WUA	Water User Associations
WWTP	Waste Water Treatment Plan

DEFINITIONS

Compensation means the payments made to persons who are victimized as a result of their access to land, water or other critical natural resources and to sources of income being restricted or through any kind of personal or common assets belonging to community members being harmed intentionally or unintentionally or said assets being destroyed, by the persons who caused such identified and agreed upon damage.

Expropriation means the seizure or restriction of ownership rights on a given property in return for a compensation equivalent to the market value of said property.

Land Consolidation means works performed for the purposes of preventing the degradation and fragmentation of lands due to natural and artificial impacts, and for fractured lands, creating new land parcels which are economically, ecologically and socially more functional through joining several pieces of land by taking into account the natural characteristics, integrity of use and ownership rights pertaining to such pieces of land, and establishing the types of usage for such parcels by considering their characteristics and surface area to ensure the provision of village and land development services.

Economic Displacement means the disappearance of income or livelihood sources or the restriction of access to resources (land, water etc.) as a result of the construction of a given project or due to operations and procedures under affiliated facilities.

Unauthorized User means persons who cannot have any legitimate right or claim as established on the land they occupy for such reasons as dwelling, workplace etc. Whereas such persons cannot receive land-related compensation, they do have a right to benefit from compensation for structural, reclamation-related and crop-related losses and from temporary livelihood support.

Involuntary Resettlement means all kinds of circumstances related to the implementation of the project causing social or economic impact, which result in a change of place, loss of residence, loss of assets or access thereto, or loss of livelihood or income sources as a consequence of the seizure of land or assets without the consent or choice of their owner and in due legal process.

Restoration of Livelihood Sources encompasses all kinds of support and assistance provided to improve the livelihood status and standards of living of Project-Affected Persons (PAPs) or at least to recover either such status or standards to the level it was before displacement or project implementation by considering which one is in a better state. A reasonable transition period for the support to be provided for the substitution of the livelihood shall be also determined.

Mitigating Measure means the measures taken to minimize the negative impacts on the livelihoods of affected persons.

Land encompasses everything growing on or permanently attached to the land such as buildings and crops.

LAP (Land Acquisition Plan) explains the procedures to be followed and actions to be taken to mitigate negative impacts on project-affected persons and communities, compensate losses and provide development-oriented benefits. The present document shall be prepared by taking into account the Turkish legislation and

the principles and objectives specified under the World Bank (WB) Environmental and Social Standards (ESS 5) as well as the Land Acquisition Policy Framework (LAPF).

LAPF (Land Acquisition Policy Framework) means the land acquisition principles, structural arrangements and design criteria to be implemented in the sub-projects to be prepared during project implementation. Following the clarification of further specific information for planning, sub-project LAPs suitable to the LAPF shall be submitted to the Bank for approval.

Project means Türkiye Water Circularity and Efficiency Improvement Project including all of its sub-projects (plans), components and phases.

Project-Affected Person (PAP) means persons who lose the right to fully or partially own, use or benefit from in any other way a built structure, land (for settlement, agriculture etc.), annual or perennial crops and trees or any other kind of fixed or movable assets as a result of the project implementation.

Physical Displacement means the relocation of project-affected persons (PAPs) from their house, office or place of business as a result of the expropriation of the project-related land, giving way to the loss of such housing and assets.

Replacement Cost means the appraisal method which is utilized in the determination of the amount that would be sufficient for the substitution of lost assets and covering related transaction fees. In the utilization of this appraisal method, the value is determined in a manner to enable the substitution of the equivalents of relevant structures and assets. For losses which cannot be easily appraised or compensated monetarily (e.g. access to public services, customers and suppliers or areas such as fisheries etc.) endeavors shall be made to provide access to equivalent and culturally acceptable resources and livelihood opportunities. For agricultural lands, such price shall be an amount that corresponds to the market price of a land which neighbors the affected land and has an equivalent production potential or utilization before the project or displacement (whichever one is higher) in addition to the costs related to the restoration of the conditions of the land in question to an equivalent level with the affected land and the fees and taxes pertaining to the transfer of title deed. For lands located in urban areas, such price shall be the market price of a land before displacement, which neighbors the affected land and has similar or enhanced public infrastructure facilities and services in addition to the fees and taxes pertaining to the transfer of title deed. For housing units and other buildings, such price shall be the market price of the materials necessary for the construction of a substituting building which is similar to the affected building or which has a larger area and better quality, or for the restoration of a partially affected building in addition to the costs for the transport of such construction materials to the site, workmanship and contractor's fees and fees and taxes pertaining to the transfer of title deed.

Resettlement means all circumstances pertaining to land acquisition and compensation for loss of assets regardless of such circumstances include a physical relocation, loss of land, dwelling, assets or other livelihoods and encompasses all measures taken to mitigate negative impacts of the project on the property and/or livelihood of PAP, including compensation, relocation (if applicable) and rehabilitation. Apart from physical relocation, loss of crops and income is also included within the impacts of resettlement.

Stakeholder means persons, groups, institutions and organizations who may impact or be impacted by a project and who are related to the project.

Vulnerable group means persons who live below the poverty line, persons who have no lands, the elderly, women, children and persons who may be impacted more negatively by resettlement due to their gender, ethnicity, age, physical or mental disabilities, economic disadvantages or social status and who may have a limited capability to benefit from and obtain resettlement assistance and related development benefits.

EXECUTIVE SUMMARY

Within the scope of the Türkiye Water Circularity and Efficiency Improvement Project, the General Directorate of State Hydraulic Works (DSİ) shall be supported and the rehabilitation of selected irrigation schemes on a land of 44,011 hectares (*Pazarcık Kartalkaya Dam Irrigation Scheme, Sarımsaklı Dam Irrigation Scheme and Karakuyu (Dombay) Pump Irrigation Scheme*) shall be financed for the reuse of treated wastewater in irrigation as a result of joint undertaking by İlbank and Ministry of Environment, Urbanization and Climate Change. The total number of beneficiaries under the project is 75,759 people.

DSİ is planning to acquire land in many of the areas where the irrigation schemes are located. Considering that land consolidation should reduce costs for irrigation modernization and decrease or even eliminate in some cases the need for expropriation of lands, thus ensuring that no farmer is left without land during irrigation modernization activities, such activities relevant to irrigation modernization are mostly performed after land consolidation. The experience in Türkiye shows that in the event that land consolidation is performed before the construction of the irrigation infrastructure in selected agricultural areas, savings at the rate of almost 40% can be achieved in both investment and operation and maintenance costs.¹ For farmers, land consolidation enables irrigation schemes to be based on proportional engineering designs to save money, time and labor and to increase productivity. Besides that, farmers who have better access to irrigation water and access roads are able to carry out other productivity increasing activities such as levelling and drainage more easily. Thus, a significant increase is achieved in the market price and productivity of the consolidated land. Land consolidation also decreases disputes over land boundaries, right of way and inequalities in access to roads and water, improving social integrity and harmony.

In Türkiye, the authority to perform land consolidation used to be vested in the General Directorate of Agrarian Reform; then, with the Law No. 7139 on "Amendments to the Law on the Organization and Duties of the General Directorate of State Hydraulic Works and Some Laws and the Law Amending the Decree Law on the Organization and Duties of the Ministry of Food, Agriculture and Livestock" published on the Official Gazette Issue 30405 dated 28.04.2018, such authority was granted to the General Directorate of State Hydraulic Works. All land consolidation projects which were ongoing or tendered out and completed by the General Directorate of Agricultural Reform before the effective date of said Law were transferred to the General Directorate of State Hydraulic Works.

As of the date on which the Law No. 7139 became effective, all tenders concerning land consolidation are being performed by the General Directorate of State Hydraulic Works. Land consolidation projects comprise intensive technical as well as social works; and in tender practices experienced contractor firms which have previously carried out land consolidation projects are invited to participate.

In two of the relevant irrigation schemes (Kartalkaya Dam Irrigation and Sarımsaklı Dam Irrigation) land consolidation activities are currently ongoing. On the other hand, land consolidation works to be carried out in the settlements located within the Karakuyu (Dombay) Pump Irrigation scheme will be implemented without the need for a new tender by being included within the scope of Afyon 2. Phase LC and OFDS Project.

¹ Suha Satana, Ali Riza Ceylan, Atakan Sert. *The Turkish Experience in Consolidation of Irrigated Land: Productivity and Efficiency Implications*. Presentation made during the World Bank Land and Poverty Conference 2017, World Bank - Washington DC, 20-24 March 2017.

A portion of the land consolidation works underway in Sarımsaklı Dam irrigation scheme have been completed within the scope of Kayseri Sarımsaklı LC and OFDS project tendered out by the General Directorate of Agricultural Reform. Land consolidation works in the remaining portions will be completed within the scope of Kayseri Sarımsaklı LC and OFDS Completion Project which was tendered out by DSİ and is currently ongoing. Land consolidation works to be performed within the settlements located in Karakuyu (Dombay) Pump irrigation scheme will be implemented within the scope of Afyon 2. Phase LC and OFDS project tendered out by the General Directorate of Agricultural Reform. Kahramanmaraş Narlı LC and OFDS Project and Kahramanmaraş 3. Phase LC and OFDS Project, which are being implemented in Kartalkaya Dam irrigation scheme, were tendered out by the General Directorate of Agricultural Reform.

In almost all of the 34 mentioned irrigation renovation projects, the acquisition of the required lands shall be achieved through land consolidation with only a portion of the Kartalkaya Dam irrigation scheme being left outside of the scope of consolidation due to not meeting the relevant criteria and thus requiring expropriation procedures.

Since no clear surface area information is present concerning the sites to be irrigated with the water to be obtained from the proposed Waste Water Treatment Plant Project, no land consolidation and expropriation assessment was performed for said sites.

Land acquisition is planned in many of the areas where irrigation schemes proposed by DSİ are located. The World Bank ESS 5 shall be applied within the scope of the project. Whereas the final designs and the related land requirements of the selected irrigation schemes are not yet known, a Land Acquisition Policy Framework (LAPF) was prepared for the project. Principles of land acquisition, expected impacts of land acquisition and land consolidation activities on the land and livelihoods and mitigating measures planned by DSİ are explained in the LAPF. As well as providing legislation information, this framework instrument also defines persons who may be affected by the project, provisions on entitlement and compensation and the work to be performed and measures to be taken by DSİ in line with the World Bank ESS 5 on Land Acquisition and Resettlement. The LAPF also includes arrangements for the supervision of preparation and implementation of plans for Land Acquisition and Land Consolidation processes by DSİ. For schemes where land acquisition or land consolidation is considered, a Land Acquisition Plan (LAP) shall be prepared in accordance with the LAPF and the World Bank ESS 5.

Summary information on the consolidation projects concerning the sites where the selected irrigation schemes are located and the consolidation activities within the irrigation schemes is presented in the following table.

Settlements Where the Irrigation Project Sites are Located and Land Consolidation Activities

Land Consolidation Activities Performed on Kartalkaya Dam Irrigation Site

Item No	Affiliated District	Settlement	Announcement Status	Area (ha)	Completion Year	Other Information
1	Dulkadiroğlu	Abbaslar	3. Announcement	792	2023	Kahramanmaraş 3. Phase Land Consolidation and OFDS Project
2		Çiğli	3. Announcement	793		
3		Çokyaşar	No announcement made.	1,598		
4		Dereköy		830		
5		Karacasu ferhuş		1,435		
6		Göllü		299		
7		Kapıçam		368		
8		Sivricehüyük	2. Announcement	755		
9		Öksüzlü	1. Announcement	488		
10		Tevekkeli	1. Announcement	405		
11		Yeniyurt	No announcement made	623		
12		Yusufhacılı	No announcement made	726		
13		Kocalar	1. Announcement	446		
14	Pazarcık	Salmanıpak	Completed.	930	2021	Kahramanmaraş Narlıovası Land Consolidation and OFDS Project
15		Bölükçam		912	2020	
16		İğdeli		2,079	2021	
17		Nefsidoğanlı		2,665	2022	
18		Eğlen		406	2019	
19		Karaçay		1,152	2020	
20		Çiçek		161	2020	
21		Hanobası		885	2021	
22		Çöçelli		2,101	2021	
23		Sarıerik		428	2020	
24		Osmandede		660	2021	
25		Ördekdede		1,803	2021	
26		Emiroğlu		1,579	2020	
27		Evri		3. Announcement	6,270	
28	Türkoğlu	Kelibişler	Completed.	1,748	2022	
29		Cennetpınarı		956	2022	
30	Pazarcık	Akçakoyunlu	Completed.	1,422	2021	
31		Akdemir		956	2022	
32		Dedepaşa		125	2019	
33		Kadıncık		88	2020	
34		Karabıyıklı		2,880	2021	
35		Karahüyük		3. Announcement	1,499	2022

Land Consolidation Activities Performed in Kayseri Sarımsaklı Dam Irrigation Site

Item No	Affiliated District	Settlement	Announcement Status	Area (ha)	Completion Year	Other Information
1	Kocasinan	Buğdaylı	Completed.	465	2020	Kayseri Sarımsaklı Land Consolidation and OFDS Project
2		Akçatepe		676	2020	
3		Elagöz		347	2020	
4		Yazır		491	2020	
5		Hasanarpa		314	2020	
6	Melikgazi	Yeşilyurt	At the grading stage.	1,005	2021	Kayseri Sarımsaklı Land Consolidation and OFDS Completion Project
7		Bağpınar		428	2021	
8	Kocasinan	Akin	At the grading stage.	910	2023	Kayseri Sarımsaklı Land Consolidation and OFDS Completion Project
9		Salur		954	2023	
10		Kızık		1,002	2023	
11		Güneşli		778	2023	
12		Gömeç		1,109	2023	

Land Consolidation Activities Performed in Afyonkarahisar Karakuyu Irrigation Site

Item No	Affiliated District	Settlement	Announcement Status	Area (ha)	Completion Year	Other Information
1	Dinar	Akgün	Not yet started.	281	2024	To be included in Afyon 2. Phase LC and OFDS Project.
2		Burunkaya		424		
3		Gökçeli		238		
4		Karakuyu		157		

In cases which require the simultaneous implementation of irrigation projects on sites where land consolidation projects are taking place, it is allowable that construction works for irrigation schemes start following the approval of land consolidation block plans by DSİ. Article 11 of the Land Consolidation Implementing Regulation titled "Measures to be Taken at Consolidation Areas" reads: "The cost of loss and damages incurred by the farmers on the implementation area within the first year and the loss of crops caused by the restrictions in the following years shall be covered by the administrative agency implementing the consolidation." Accordingly, all kinds of loss of income to be incurred due to the construction of irrigation schemes without the delivery of the site to land owners within the scope of the land consolidation project is to be compensated by DSİ. Within this context, no obstacles will be met in carrying out the relevant irrigation construction works.

DSİ is the institution responsible for the implementation of the project. DSİ has significant experience within the scope of the relevant national legislation on expropriation, land consolidation and resettlement and also has amassed knowledge and experience in World Bank OP 4.12 practices under the Türkiye Irrigation Modernization Project. The immovables necessary for the irrigation schemes to be modernized within the scope of the project shall be identified by DSİ Department of Real Estate and Expropriation in consultation with DSİ Department of Projects and Construction and the relevant Regional Directorate. Under the coordination of the Department of Real Estate and Expropriation and the Department of Land Consolidation and On-Farm Development Services, a LAP shall be prepared for each project which requires land acquisition and land consolidation, and monitored for the duration of project implementation. The LAP preparation and the monitoring will be done by a third-party consultant retained by DSİ.

Türkiye has a strong national legislation on expropriation, land consolidation and resettlement. However, some gaps still exist between the Turkish legislation and the World Bank ESS 5. Such gaps relevant to land

acquisition within the scope of the project can be summarized as follows: lack of action planning for resettlement (no action plan needs to be prepared for the resettlement of displaced persons), non-land owner project-affected persons (PAPs) including vulnerable groups and PAPs affected severely not being identified and/or their losses not being compensated, the difference between the expropriation value and the full replacement cost (in the Turkish legislation, depreciation is deducted), tenants and unauthorized land/asset users being compensated at different rates, lack of measures to reinstate livelihoods, and the limitedness of provisions on public disclosure, opinion taking, participation and grievance notification. Within the scope of the LAPF, such gaps are bridged with a view to ensuring coherence with ESS 5.

Moreover, certain differences between the current land consolidation procedures and the World Bank ESS 5 are also observed. For instance, the site wherein land consolidation is to be performed is identified with a Presidential Decree which asserts a function of expropriation / public interest, thus allowing for the land consolidation to be carried out either with or without seeking consent. No option for withdrawal exists for land owners and during land consolidation a maximum of 10% of the land can be reduced without being subject to compensation to be utilized for common facilities. In land consolidation projects, there are two factors affecting the changes in the areas of the land owned by land owners. The first of these is the contribution share for common facilities (LAPS-Layout Arrangement Partnership Share), and this rate does exceed 10% in accordance with national legislation. The other factor is the gradation equivalence conversion factor, which is determined by gradation maps. If the land is moved to a more favorable location with gradation conversion, land area will decrease accordingly, and if the land is moved to a less favorable location, land area will increase accordingly. It is noted in Article 13 with the title Land Gradation of Land Consolidation and OFDS Implementing Regulation that "Lands located in the consolidation zone are graded by the land gradation commission based on soil and fertility studies conducted or commissioned by the project unit which determine the permanent and variable properties of the soil, distance from settlements or business centers and other characteristics of the land in order to provide a new land with the same value. Gradation factors are determined accordingly. Determined factors are multiplied with cadastral parcel areas and values of the parcels over units are obtained. A new plot plan is established over this value." and works are carried out as per the provisions of this legislation. No right of indemnity arises from the increase or decrease of land area or no charges are claimed from land owners. All relevant information is provided to land owners during consultation and negotiations in detail and repetitively. In addition, meetings are held with land owners both at the beginning of the project and at later stages of the project, and all kinds of information about land consolidation is provided, furthermore, land owners can refer to the Administration at every stage of the project and submit their requests and complaints. DSİ is developing an action plan regarding the users in the project area other than the legal users (generally users of treasury lands), these people will be guided to treasury lands that they can use after the project, and will also be assisted in all kinds of work and procedures to become legal users of these lands. The benefits arising from land consolidation and irrigation, which positively affect the productivity of the land after consolidation and exceed the loss due to the aforementioned contribution share, cause land owners to prefer this manner. DSİ plans to prepare an evaluation and research report after both land consolidation and irrigation renovation works are completed and one or two agricultural production periods have passed. This report is planned to be outsourced to independent organizations to ensure a more objective analysis and interpretation of the project results. Areas designated as common facilities are on-farm roads providing access to agricultural plots, areas required for irrigation and drainage networks and areas required for the construction of such networks. The project contains mostly positive impacts due to its improvement of irrigation services. The restricted potential negative impacts of the project are limited to the loss of the land used for horticulture/agriculture and the buildings and crops thereon

due to land acquisition and the economic displacement of persons living on said lands. It is envisaged that no physical displacement would take place due to the project.

Since the schemes selected within the scope of the project will be improved by using existing channels and routes to the extent possible, said impacts will be avoided and minimized. In addition to this, land consolidation will be performed prior to modernization activities, thereby further decreasing the need for expropriation. Moreover, since the entire irrigation network is designed as a closed system where pressurized pipes are utilized, it is taken under guarantee that no physical displacement should happen. Considering that open channel systems will be transformed into underground pipe networks which require less amount of land, a portion of the lands expropriated in the past will become idle. Such lands can be opened for agricultural use by farmers in the area. Construction works within the scope of the project shall be planned in a manner not to disrupt existing irrigation activities. The following table does not include estimations on unauthorized users or tenants/sharecroppers, if any. DSI is going to plan construction works in a manner not to disrupt existing agricultural or irrigation activities with a view to preventing and/or minimizing loss of income for land owners/users and seasonal workers.

DSI's Estimations for Expropriation in Selected Schemes

Irrigation Scheme	Net irrigated area (ha)	Estimated Ownership Rights				Estimated Easement Rights				Estimated Total			
		Number of plots	Surface area (m ²)	Cost (TRY)	Number of PAPs	Number of plots	Surface area (m ²)	Cost (TRY)	Number of PAPs	Number of plots	Number of PAPs	Surface area (m ²)	Cost (TRY)
Sarımsaklı	8,300	105	945,000	14,175,000	315	315	2,835,000	14,883,750	945	420	1,260	3,780,000	29,058,750
Pazarcık	20,431	100	47,900	2,155,500	200	400	210,650	3,159,750	500	500	700	258,550	5,315,250
Karakuyu	15,280	107	24,600	492,000	418	382	102,400	716,800	1,492	489	1,910	127,000	1,208,800
TOTAL	44,011	312	1,017,500	18,822,500	933	1,097	3,148,050	18,760,300	2937	1409	3870	4,165,550	35,582,800

Identified vulnerable groups are female farmers, non-owner users, persons using public lands and seasonal agricultural workers. The final number of PAPs and the impacts thereon shall be determined during the preparation of LAP and the project-related losses of such groups shall be covered by taking the special measures pointed out under the LAPF entitlement matrix.

In areas where expropriation transactions will take place, land owners or users who have legitimate rights shall be compensated in cash over a replacement cost equal to the acquisition of an equivalent substituting land in cases where an equivalent land and/or indefinite ownership right is acquired. Likewise, in cases of temporary loss of land (easement rights), the relevant persons shall be paid for such easement rights. For buildings and structures utilized for residential and non-residential purposes, owners and users (including unauthorized users) shall be compensated in cash over the full replacement cost. Lost trees shall be compensated for over the net present value of economically valuable trees and by taking into account the species and age of the tree and the market price and economic life of the product it bears. For crop owners, the expected production amount shall be compensated in cash over the sale price obtained by the farmer at harvest time. If possible, a sufficient amount of time shall be allowed for by DSI for the harvesting of crops in order to prevent the loss thereof.

As for areas wherein land consolidation activities will take place, following the project land owners shall be given lands of a size that is equal to the lands they owned before consolidation, which have been rendered fit for agricultural mechanization and whose OFDS activities are completed. During land consolidation, in the event that construction activities are carried out on areas required for the irrigation renovation project, material losses in these areas shall be compensated in order not to victimize land owners.

For unauthorized users, vulnerable groups and households impacted severely, DSİ shall restore or improve livelihoods to pre-project level by taking one or several of the potential measures listed here below: (i) DSİ will support unauthorized users to obtain legal ownership of their lands to the extent possible; (ii) DSİ will provide unauthorized users with purchase options on DSİ-owned lands to the extent possible; (iii) Unauthorized users will be informed about such land rental or purchase options by the General Directorate of National Estate; (iv) DSİ will provide information to those interested on how to apply to district governorates to benefit from İŞKUR's Social Benefit Program or to the relevant Social Aid and Solidarity Foundations to obtain funds; (v) DSİ will ensure that contractors prioritize unauthorized users within the framework of the job/employment opportunities under the project. Lastly, in cases where dwellings, buildings and structures affected by the construction are damaged by the contractor, the construction contractor shall assess the damages and take steps towards their compensation. In the event that losses and damages are unable to be mitigated or eliminated, affected structures shall be compensated for in line with the LAPF. Construction activities shall be planned in a manner to minimize the loss of income for land owners, land users, seasonal workers and persons living in areas where the relevant lands are located.

DSİ implements a comprehensive consultation process to ensure the participation of land owners in land consolidation and irrigation modernization procedures. Prior to the commencement of modernization works, DSİ shall perform consultation meetings with Water User Associations and local communities remaining within the area of impact of the irrigation schemes within the scope of the project and document such meetings. A Stakeholder Engagement Plan (SEP) including different messages to be conveyed in meetings to be held with different stakeholder groups and participation and engagement methods was prepared by DSİ and sub-project specific plans will also be prepared.

All instruments shall be approved by the Government of the Republic of Türkiye and the World Bank, published in both English and Turkish on the World Bank website and announced locally to stakeholders and PAPs. Draft versions of the instruments shall be revised in accordance with the feedback received locally during consultations. Final versions of the instruments shall be likewise disclosed at the relevant local units of DSİ in hard copy and on the DSİ website. Amendments to be made in the instruments shall be announced in the same manner following their revision and updating.

DSİ shall also develop its existing 4-stage Grievance Redress Mechanism (GRM) (at the levels of WUA, DSİ Branch Directorate, Regional Directorate and General Directorate of DSİ) as necessary. Affected persons or stakeholders will thus be enabled to convey their objections and grievances to any one of said units via e-mail/telephone or through direct application to national grievance notification mechanisms such as CİMER (Presidency Communications Center). Thus, responding to all objections and grievances pertaining to land acquisition/consolidation procedures and/or other environmental social issues during the construction and implementation phases shall be facilitated. All grievances received by DSİ shall be answered within 15 days. In the event that the settlement of a grievance takes more than 15 days, the aggrieved party shall be notified and endeavors shall be made to resolve the issue within one month. DSİ shall keep records of all objections

and grievances received during consultations via the GRM and duly resolved. Said records shall be shared with the World Bank as part of the six-monthly monitoring reports.

Land acquisition and land consolidation processes shall be followed up by being regularly monitored within the framework of six-monthly monitoring and follow-up activities. DSI shall assign one independent consultant to monitor the land acquisition and land consolidation works it carries out. This independent consultant shall prepare the Closing Report and submit it for Bank approval.

1. INTRODUCTION

1.1. PROJECT OVERVIEW

Türkiye has already started a modernization program (TSMP/TIMP) within the irrigation sector. The proposed project primarily aims to enable the re-use of water utilized in agricultural irrigation by being treated and transmitted through irrigation networks to be constructed for agricultural irrigation and to diversify investments made within the scope of TWCEIP. The project will also contribute to the elimination of threats on critical services such as irrigation and water supply by supporting the principle of circularity/sustainability in order to diversify and increase water resources in water stressed areas. Moreover, it will also ensure the adoption of measures such as the re-use of treated waste water, improvement of irrigation facilities and strengthening sectoral capacities to better manage water resources and diminish water-related risks. Main objectives of the project will be supporting long-term growth and focusing on principles of circular economy through improving the management of water resources by way of waste water treatment and re-use of waste water.

Ensuring the active engagement of beneficiaries, institutional development will also be supported through the design and operation of irrigation schemes to improve social and environmental management and strengthen Water User Associations (WUAs). The basic motivation of the project is not limited to the improvement of the network infrastructure. The model shall include the following particulars: (i) renovation and/or rehabilitation of irrigation schemes, (ii) construction of new waste water treatment systems, (iii) re-use of waste water utilized in agricultural irrigation for irrigation after treatment, (iv) strengthening the capacities of Water User Associations, (v) purchasing water meters and ensuring their integration to on-farm systems within the scope of the controlled and efficient use of water.

Türkiye Water Circularity and Efficiency Improvement Project aims to perform the relevant works by regulating to the extent possible the irrigation networks which have become dated and unusable by consolidating and rearranging the fractured lands belonging to land owners and by revising the irrigation networks with a view to increasing the agricultural production of Türkiye and ensuring economical utilization of benefits expected from water. The project will consist of the following components:

Component A. Waste Water Collection, Treatment and Re-use in Irrigation (248 Million Euro):

The overall purposes of this component are providing access to sanitation services, reducing pollution from waste water, decreasing the pressure on existing freshwater resources caused by irrigation and similar sources, increasing resilience against risks such as droughts aggravated by climate change and promoting low-carbon oriented interventions. Additionally, it is also aimed to increase the usability of treated waste water as an alternative irrigation resource at times of scarcity in water stressed basins and to decrease water pollution and environmental degradation caused by the discharge of untreated waste water into receiving bodies of water.

The estimated cost of the WWTP facilities to be constructed within the scope of the component is 248 Million Euro. It is planned that the construction project for WWTP facilities will be prepared under the coordination of İlbank and Ministry of Environment, Urbanization and Climate Change. This framework report encompasses irrigation renovation works.

Component B. Rehabilitation, Construction and Modernization of Irrigation Schemes (267 Million Euro)

This component shall be implemented under the responsibility of DSİ. Within the scope of the component, it is planned to renovate the schemes and provide irrigation services where water treated through WWTPs will be used. A total cost of 267 Million Euro is estimated for the rehabilitation of existing irrigation facilities and the construction of new waste water treatment / irrigation networks. This component would support improvements in irrigation service delivery, increases in irrigation efficiency and productivity, improvements in agricultural production and productivity, and increases in farm income in selected water stressed basins, which are expected to result in a net decrease of greenhouse gas (GHG) emissions from energy use. The component aims to provide a pressurized and more reliable irrigation supply for farmers to enable the cultivation of crops with a high net return, to ensure the reuse of waste water in agriculture in water-scarce basins, to decrease the need for irrigation water and water losses in irrigation schemes and to increase irrigation efficiency.

It is planned by İlbank and Ministry of Environment, Urbanization and Climate Change under Component A to enable irrigation of agricultural lands surrounding the treatment plant depending on the amount of water eligible to be used in agriculture upon the construction of additional units in the existing waste water treatment plant in Konya. KOSKİ shall be liable for the establishment, operation and maintenance of the additional disinfection unit aiming to ensure the compliance of treated waste water to international standards to be used in irrigation. Given that the additional disinfection unit concerns irrigation, its financing is planned to be covered by the loan to be extended to DSİ.

In order to increase the efficiency of irrigation projects, 150,000 water meters will be purchased and installed under this component of the project (TRY 400 Million).

Component A – Waste Water Collection, Treatment and Re-use in Irrigation	~248 Million Euro (TBC)
Component B – Rehabilitation and Modernization of Irrigation Systems	~267 Million Euro (TBC)
Component C – Technical Support for Institutional Strengthening, Capacity Building and Innovation	2.5 Million Euro (TBC)
Component D – Project Management	6 Million Euro (TBC)
TOTAL	523.5 Million Euro

Component C on technical support for institutional strengthening, capacity building and innovation (2.5 Million Euro) and Component D on project management (6 Million Euro) are included within this scope. A total loan of 523.5 Million Euro is expected to be made available for all components under the project.

Table 1: Overview of Selected Irrigation Schemes

Irrigation Scheme	Service Area (ha)	Total Population in the Project Area	Estimated Population Engaged in Agriculture	Number of Project Beneficiaries	Number of WUA Members	Total Plot Number
Sarımsaklı	8,300	19,691	6,564	6,564	976	11,052
Karakuyu	15,280	29,650	15,000	3,070	1,620	4,300
Pazarcık	20,431	27,535	45,000	65,000	2,993	6,000

The survey and planning work for the irrigation areas where the treated irrigation water to be obtained from treatments to be carried out apart from the selected irrigation renovation projects the general characteristics of which are given above will be used, is still in progress and provisions of this framework policy will also be applied in the LAPs to be prepared for WWTP irrigation after the irrigation zones are determined.

1.2. OBJECTIVES OF THE LAND ACQUISITION POLICY FRAMEWORK (LAPF)

This framework instrument was prepared in recognition of the fact that land requirements within the scope of the works related to the re-use in agricultural irrigation of waste water treated via existing and planned WWTPs and transmitted through irrigation schemes selected for modernization are not known for certain. Land requirements for each scheme shall become clear once the relevant designs for the schemes are finalized. Estimations on land requirements including both ownership and easement rights are provided below in Table 2. For all areas which would require land acquisition and land consolidation, a Land Acquisition Plan (LAP) will be prepared, which will accommodate the LAPF and the World Bank ESS 5² ..

Since the schemes selected within the scope of the project will be improved by using existing channels and routes to the extent possible, said impacts will be avoided and minimized. In addition to this, land consolidation will be performed prior to modernization activities, thereby further decreasing the need for expropriation. Moreover, since the entire irrigation network is designed as a closed system where pressurized pipes are utilized, it is taken under guarantee that no physical displacement should happen. Considering that open channel systems will be transformed into underground pipe networks which require less amount of land, a portion of the lands expropriated in the past will become idle. The lands can be opened for agricultural use by farmers in the area. Construction works within the scope of the project shall be planned in a manner not to disrupt existing irrigation activities.

DSİ is going to plan construction works in a manner not to disrupt existing agricultural or irrigation activities with a view to preventing and/or minimizing loss of income for land owners/users and seasonal workers.

The project contains mostly positive impacts due to its improvement of irrigation services. The restricted potential negative impacts of the project are limited to the loss of the land used for horticulture/agriculture

² [ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement](#)

and the buildings and crops thereon due to land acquisition and the economic displacement of persons living on said lands. It is envisaged that no physical displacement would take place due to the project.

Table 2: Estimated Land Acquisition Requirements for the Selected Irrigation Schemes

Irrigation Scheme	Ownership Rights				Easement Rights				TOTAL			
	Surface area (m ²)	Number of plots	Number of affected persons	Cost (TRY)	Surface area (m ²)	Number of plots	Number of affected persons	Cost (TRY)	Surface area (m ²)	Number of plots	Number of affected persons	Cost (TRY)
Sarımsaklı	945,000	105	315	14,175,000	2,835,000	315	945	14,883,750	3,780,000	420	1,260	29,058,750
Pazarcık	47,900	100	200	2,155,500	210,650	400	500	3,159,750	258,550	500	700	5,315,250
Karakuyu	24,600	107	418	492,000	102,400	382	1,492	716,800	127,000	489	1,910	1,208,800

In order to minimize expropriation (land acquisition) needs, DSI will make use of land consolidation activities in irrigation projects falling within the present scope. ESS 5 applies for all land consolidation activities carried out³. An overview of the land consolidation procedures relevant to mentioned irrigation schemes is presented under Table 3 below.

³ The WB ESS 5 applies for "other activities which, as per the judgment of the World Bank, would result in involuntary resettlement and which (a) has a direct and meaningful connection to the project supported by the Bank, (b) is necessary to achieve the objectives of the project in question as set forth in project documents and (c) are to be or are planned to be implemented simultaneously with the project".

Holding Size (da)	Total (da)	%
1-20	17,877.00	67.84
21-50	6,422.00	24.37
51-100	1,520.00	5.77
101-150	282,00	1.07
151-200	101,00	0.38
201-500	93.00	0.35
Larger than 500	56.00	0.21
Total	26,351.00	100,00

In light of the information provided in this table, it was found in the examination made on the site wherein four irrigation schemes included within the scope of renovation are located that a large portion of the lands have a size of between 1 – 20 da. This reveals the necessity for the implementation of a land consolidation project on mentioned sites.

Table 3: Overview of Land Consolidation Activities Related to the Selected Irrigation Schemes

Irrigation Scheme	Area (ha)	Number of plots	Number of holdings	Cost (TRY)
Sarımsaklı	8,478	11,052	8,106	27,720,564
Pazarcık	38,142	10,432	16,765	26.424567
Karakuyu	1,100	1,499	1,910	4,406,000

*The numbers given are estimations and will be revised after the finalization of the project design.

1.3. SCOPE OF LAPF

As the social impacts caused by land acquisition, land acquisition requirements and the project footprint of each irrigation scheme selected accordingly under the Türkiye Water Circularity and Efficiency Improvement Project (TWCEIP) to be implemented by DSİ are not yet known for certain, said particulars are addressed within the Land Acquisition Policy Framework. Procedures explained in the LAPF shall manifest the steps to be taken in order to ensure coherence with the provisions and principles under relevant Turkish legislation and the World Bank ESS 5.

Principles of land acquisition, impacts of land acquisition and land consolidation activities on the land and livelihoods and mitigating measures planned by DSİ are explained in this LAPF. The instrument also provides an overview of the Turkish legislation and defines persons who may be affected by the project, sets forth provisions on entitlement and compensation and explains the works to be done and measures to be taken by DSİ to ensure compliance with the ESS 5. The LAPF also includes arrangements for the supervision of the preparation and implementation of the LAP by DSİ. The LAP will be prepared and monitored by a third-party consultant retained by DSİ.

Besides resolving objections and grievances received during consultation sessions for the irrigation schemes for which it performs land consolidation transactions, DSI will prepare an LAP acceptable to the Bank before construction works related to land consolidation for irrigation modernization commence. DSI will explain the steps it will take to minimize additional land acquisition which may lead to further grievances and expropriation for a number of PAPs (both legal and unauthorized land users) due to modernization efforts. Measures defined under LAPF will be implemented as necessary to restore or improve livelihoods to pre-project level for PAPs. Actions taken within the scope of LAPF will be regularly followed up on along with the LAPs over the six-monthly reports. DSI will also keep a record of all objections and grievances received and resolved during consultations, through the GRM and over the six-monthly monitoring reports.

1.4. LAPF METHODOLOGY

DSI shall be the main responsible institution for Component B of the project. Immovables to be required for the irrigation and waste water irrigation schemes which will be modernized within the scope of the project will be identified by being consulted with the Department of Real Estate and Expropriation, Department of Land Consolidation and OFDS, Department of Projects and Construction, Department of Waste Water, Department of Operation and Maintenance and the relevant Regional Directorates.

In line with the benefits to be obtained from land consolidation and considering the existence of a demand for land consolidation, DSI's preference is for the land consolidation to take place before irrigation modernization activities to the extent possible.

Determination of ownership for immovables subject to expropriation shall be done under the coordination of the Department of Real Estate and Expropriation over title deed records, satellite imagery and other documents and by filing information requests with the relevant Regional Directorates as may be necessary. Departments of Real Estate and Expropriation will be responsible for land acquisition and Land Consolidation and OFDS will be responsible for land consolidation.. Said plans shall follow the format specified under Annex 1 of the present LAPF and be implemented by DSI. Additional summary information on institutions, departments and other units involved in the preparation and implementation processes of the LAPF/LAP is provided below under Table 4.

**Table 4. Institutions/Departments which will Play a Part
in Türkiye Water Circularity and Efficiency Improvement Project (TWCEIP)**

Relevant Institution	Unit / Department	Task Description
DSİ	Department of Real Estate and Expropriation	Allocation of funds for locations requiring expropriation, sub-contractor approval and coordination with the Regional directorate.
DSİ	Department of Land Consolidation and On-Field Development Services	Obtaining a Presidential Decree for projects found eligible for land consolidation, approval of block plans, grading maps and subdivision plans prepared/outsourced by the Regional Directorate, completion of land consolidation works in line with the modernization project and the overall project.
DSİ	Department of Projects and Construction	Preparation of projects under Türkiye Water Circularity and Efficiency Improvement Project (TWCEIP). Notification and briefing of relevant Departments on the expropriation or acquisition for land consolidation of required areas as specified under the projects prepared.
DSİ	Department of Operation and Maintenance	Identification of the projects to be included within the scope of TWCEIP and updating the Department of Real Estate and Expropriation about the existing irrigation schemes and social structure in coordination with the relevant Water User Associations.
DSİ	Department of Waste Water	Preparation of Waste Water Treatment Plant projects within the scope of TWCEIP. Notification of the relevant Municipalities about the need for the expropriation of required areas as specified under the projects prepared.
DSİ	Relevant Regional Directorates	Planning and implementation of TWCEIP projects and land consolidation and expropriation works. Determining the irrigation program to be implemented during construction activities together with Water User Associations.

Table 5 below further details activities and responsible parties involved in preparation, implementation, and monitoring.

2. PROJECT DEFINITION

2.1. PROJECT OBJECTIVE

The Project shall contribute to the addressing of existing threats to water security in Türkiye by supporting the principles of circularity in order to diversify and increase water resources in water stressed basins. Such contribution will happen through the adoption of measures such as the re-use of treated waste water, improvement of the efficiency of irrigation services and strengthening sectoral capacities to better manage water resources and diminish water-related risks. Proposed projects are congruent the national development priorities of the Government of the Republic of Türkiye as outlined in the 11. National Development Plan and DSI's development strategy.

Project objectives can be listed as follows: (a) to enhance circularity and the efficiency of the irrigation and waste water irrigation service network in water-scarce basins and (b) to strengthen institutional capacity in order to increase circularity and efficiency in Türkiye's management of water resources in selected basins.

2.2. CHARACTERISTICS OF SUB-PROJECTS

The Sarımsaklı Dam Irrigation Rehabilitation project involves the use of water stored in Sarımsaklı Dam located within the boundaries of Kayseri province, Melikgazi and Kocasinan districts for the irrigation of some agricultural lands located within the boundaries of Melikgazi and Kocasinan under project conditions.

Karakuyu (Dombay) Pump Irrigation Renovation project involves the use of water from Lake Çapalı, a.k.a. Lake Karakuyu located within the boundaries of Afyonkarahisar province, Dinar district as supply to meet the need for irrigation water in agricultural lands within the villages of Sueldere, Gökçeli, Burunkaya, Karakuyu, Alacaatlı, Akgün, Çapalı and İncesu which currently have an irrigation scheme consisting of open channels and flumes.

Pazarcık Kartalkaya Dam Irrigation Renovation project will meet the need for irrigation water in agricultural lands in the southern Dulkadiroğlu district, eastern Türkoğlu district and western Pazarcık district located within the boundaries of Kahramanmaraş province.

2.3. PROJECT LOCATION

The project involving the use of water stored in Sarımsaklı Dam located within the boundaries of Kayseri province, Melikgazi and Kocasinan districts for the irrigation of some agricultural lands located within the boundaries of Melikgazi and Kocasinan under project conditions will be named as Sarımsaklı Dam Irrigation Rehabilitation.

The project wherein the water from Lake Çapalı, a.k.a. Lake Karakuyu located within the boundaries of Afyonkarahisar province, Dinar district shall be used as supply to meet the need for irrigation water in agricultural lands within the villages of Sueldere, Gökçeli, Burunkaya, Karakuyu, Alacaatlı, Akgün, Çapalı and İncesu which currently have an irrigation scheme consisting of open channels and flumes will be named as Karakuyu (Dombay) Pump Irrigation Renovation Phase 1.

The project wherein the need for irrigation water in agricultural lands in the southern Dulkadiroğlu district, eastern Türkoğlu district and western Pazarcık district located within the boundaries of Kahramanmaraş province shall be met will be named as Pazarcık Kartalkaya Dam Irrigation Renovation.

2.4. PROJECT COMPONENTS

The existing irrigation schemes shall be modernized and made available for the use of the local population for the purposes of decreasing drought risks and making efficient use of natural resources. The relevant components within this scope can be grouped under 5 main themes.

Supply of Irrigation Water

Irrigation water shall be supplied from existing dams with no restrictions in water supply expected.

Rehabilitation of Irrigation Schemes

Within the scope of the projects prepared, the existing traditional irrigation scheme shall be replaced with a High Pressure – Pump and Pipe irrigation scheme.

Drainage Channels

The high level of groundwater and the land elevation difference being low necessitates that the drainage network is utilized in an efficient manner by holdings.

The essential element of irrigation activities performed over a traditional scheme is the establishment of a drainage network in areas with a very low elevation difference or no difference at all. The fact that the water fed into the scheme increases the level of groundwater is deemed negative for the efficient use of soil.

In the site examinations already performed, drainage channels were among the first components that drew attention. However, in the event that a High Pressure- Pump and Pipe irrigation scheme is introduced, even though the drainage system may remain for the purposes of controlling the level of groundwater, it will not be operated as actively as it was under the traditional system.

Since as a result of the irrigation to be performed through drip or sprinkler systems the crops would be given the exact amount of water they need, this component will remain but become less important than in the former scheme.

Operation of Irrigation Schemes.

The irrigated area currently in operation is being operated through Water User Associations. Works shall be carried out in a sustainable manner during and after the modernization of the irrigation scheme. Sustainability of the works performed serves as the governing idea behind all works. A modern Irrigation Scheme will thus be developed without causing irreversible damage to the natural environment and by protecting the baseline situation.

Construction of Operation and Maintenance Roads

Roads necessary for the operation and maintenance of pipes laid in relation to the irrigation scheme to be developed will also be constructed within the scope of the project. Thus, it will be possible to respond to system failures and have access to all corners of the site.

2.5. PROJECT IMPLEMENTATION ARRANGEMENTS

Located within an area of 8,478 hectares, Kayseri Sarımsaklı Gravity and Pump Irrigation has ongoing land consolidation works on 12 settlements currently. Land consolidation works have been completed in 7 settlements with works ongoing in 5 settlements.

Karakuyu (Dombay) Pump Irrigation Renovation Phase 1 includes the Dinar Karakuyu irrigation scheme which became commissioned in 1991. No lands for which land consolidation works were completed in the previous years under another project exist within the project site. Under TWCEIP, a total of 1100 ha of land within the villages of Akgün (281 ha), Burunkaya (424 ha), Gökçeli (238 ha) and Karakuyu (157 ha) remain within the project site; and since the lands in question meet the criteria for land consolidation, land consolidation works can be carried out within the scope of the project. The total of 1100 ha of land whereon land consolidation works are to be carried out in the project site comprises of 3044 plots.

For Afyonkarahisar Dinar Karakuyu Pump Irrigation Rehabilitation project, land acquisition shall be tried to be performed primarily through consolidation and expropriation will be turned to in case of a need.

Apart from the areas imperative for the implementation of Pazarcık Kartalkaya Dam Irrigation Renovation project located within the boundaries of Kahramanmaraş province, land acquisition shall be performed through land consolidation with expropriation coming into play in cases where such need cannot be met through consolidation.

In two of the selected irrigation schemes (Kartalkaya Dam Irrigation and Sarımsaklı Dam Irrigation) land consolidation activities are currently ongoing. On the other hand, land consolidation works to be carried out in the settlements located within the Karakuyu (Dombay) Pump Irrigation scheme will be implemented without the need for a new tender by being included within the scope of Afyon 2. Phase LC and OFDS Project.

A portion of the land consolidation works underway in Sarımsaklı Dam irrigation scheme have been completed within the scope of Kayseri Sarımsaklı LC and OFDS project tendered out by the General Directorate of Agricultural Reform. Land consolidation works in the remaining portions will be completed within the scope of Kayseri Sarımsaklı LC and OFDS Completion Project which was tendered out by DSİ and is currently ongoing. Land consolidation works to be performed within the settlements located in Karakuyu (Dombay) Pump irrigation scheme will be implemented within the scope of Afyon 2. Phase LC and OFDS project tendered out by the General Directorate of Agricultural Reform. Kahramanmaraş Narlı LC and OFDS Project and Kahramanmaraş 3. Phase LC and OFDS Project, which are being implemented in Kartalkaya Dam irrigation scheme, were tendered out by the General Directorate of Agricultural Reform.

The table below covers the activities related to both land consolidation, led by DSI Department of Land Consolidation and OFDS, and land acquisition, led by DSI Department of Real Estate and Expropriation. It covers preparation and implementation, including of LAPs. It also covers monitoring of the ongoing works, and external monitoring which will be conducted following the completion of the process,.

Table 5. Process for Land Acquisition and Land Consolidation and Associated Plans

Activity		Responsible Party
Preparation of LAP		
1	Final design of each project	DSİ Department of Projects and Construction
2	Assignment of an Consultant	DSİ Department of Real Estate and Expropriation DSİ Department of Land Consolidation and OFDS
3	Agreement on the social status baseline study	DSİ Department of Real Estate and Expropriation/Department of Land Consolidation and OFDS and/or LAP Consultant
4	Appraisal of assets subject to land acquisition	DSİ Regional Directorate or Consultant
5	Preparation of draft Plan and its submission to DSİ and World Bank for assessment	DSİ Department of Real Estate and Expropriation/Department of Land Consolidation and OFDS and/or Consultant
6	Disclosure of draft plan	DSİ Department of Real Estate and Expropriation DSİ Department of Land Consolidation and OFDS
7	Consultation with relevant parties	DSİ Department of Real Estate and Expropriation/Department of Land Consolidation and OFDS and/or Consultant
8	Finalization of plan (in light of the feedback received)	DSİ Regional and/or Provincial Directorate or Consultant
9	Operationalisation and Reporting on Grievance Redress Mechanism	General Directorate of DSİ
Implementation		
7	Consultations with the affected parties and other stakeholders concerning project requirements	DSİ Regional Directorate
8	Compensation negotiations	DSİ Regional Directorate
9	Payment of compensation and entry into the land	DSİ Regional Directorate
10	Continuous consultations on the construction plan and	DSİ Regional Directorate
11	Construction in accordance with the new irrigation plan	Construction Contractor
12	Continuous follow-up of Plan implementation and (six-monthly) reporting	DSİ Regional Directorate and DSİ Department of Real Estate and Expropriation/Department of Land Consolidation and OFDS or Consultant
Monitoring		
13	Preparation of draft LAP Closing Report	Independent Consultant
14	Submission of draft LAP Closing Report to DSİ and World Bank	Independent Consultant
15	Completion of LAP Closing Report	Independent Monitoring and Follow-Up Consultant
16	Announcement of LAP Closing Report	General Directorate of DSİ

2.6. PROJECT BENEFICIARIES

Kayseri Sarımsaklı Gravity and Pump Irrigation project site is located in the Central Kızılırmak Basin within the Central Anatolia Region. It serves the settlements under Kocasinan and Melikgazi districts to the

east of Kayseri province. The irrigated area is 8,300 ha and the number of project beneficiaries on 11,052 plots is 6,564 people, with 976 registered water user association members.

Afyonkarahisar Dinar Karakuyu Pump Irrigation project site is located in the Basin of Lakes to the southwest of Türkiye, within the boundaries of Dinar district located in southwestern Afyonkarahisar province. *The irrigated area is 15,280 ha and the number of project beneficiaries on 4,300 plots is 3,070 people, with 1,620 registered water user association members.*

Kahramanmaraş Pazarcık Kartalkaya Irrigation Project site encompasses the irrigated area of Kartalkaya Dam operating within the boundaries of Kahramanmaraş province in the Mediterranean Region of Türkiye. It falls within the Central Ceyhan Basin and serves settlements under Pazarcık, Dulkadiroğlu and Türkoğlu districts. The irrigated area is 20,431 ha and the number of project beneficiaries on 6,000 plots is 65,000 people, with 2,993 registered water user association members.

3. THE LEGAL AND REGULATORY FRAMEWORK IN TÜRKIYE

3.1 APPLICABLE NATIONAL LEGISLATION ON LAND ACQUISITION

For the acquisition of the lands required for the proposed irrigation projects, DSİ primarily looks to the method of land consolidation. Land consolidation is the preferred method as it provides numerous benefits to the land owner. For the most part, land consolidation is an approach that increases crop productivity, income and land value while minimizing loss of land as well as decreasing production inputs and, depending on the crop pattern, labor costs. However, in cases where lands which cannot be acquired through consolidation or are found technically unfit for consolidation exist, the acquisition of the required lands is ensured through expropriation. Whereas land acquisition through expropriation is one of the methods followed by DSİ in their various investments, DSİ avoids involuntary physical resettlement in the expropriation of public or privately owned lands to the extent possible.

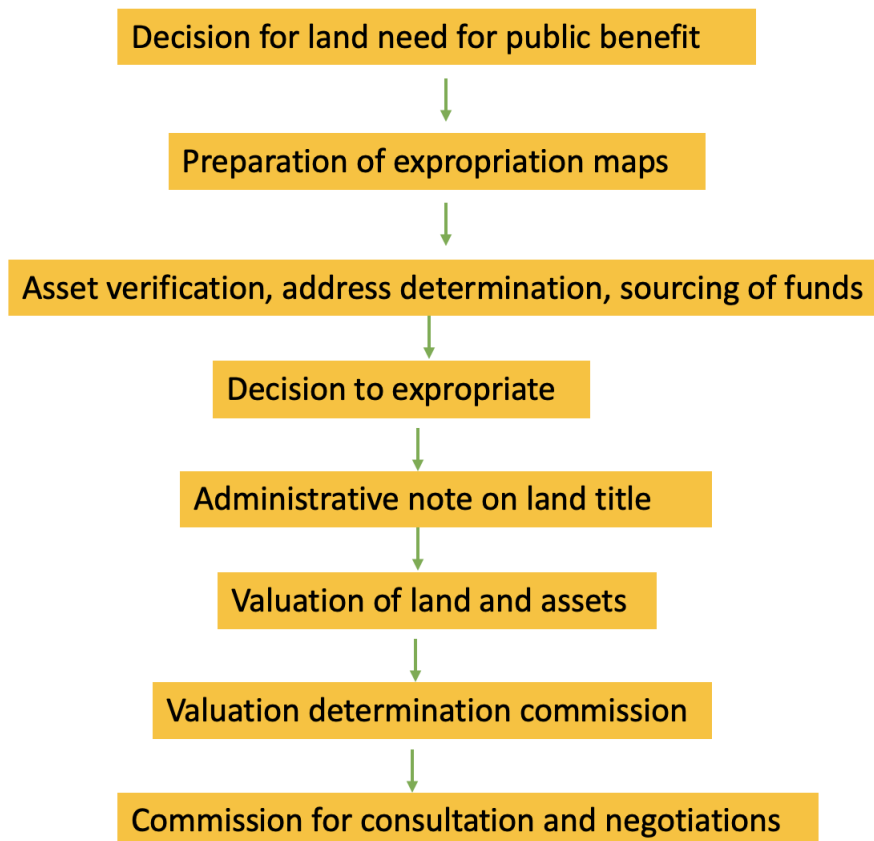
As per Article 46 of the Constitution of the Republic of Türkiye, in cases necessitated by public benefit, the State and public legal entities are authorized to expropriate the entirety or part of a privately owned immovable in accordance with the principles and procedures specified under the relevant laws and to establish an administrative easement thereon, provided that its real value is paid in cash.

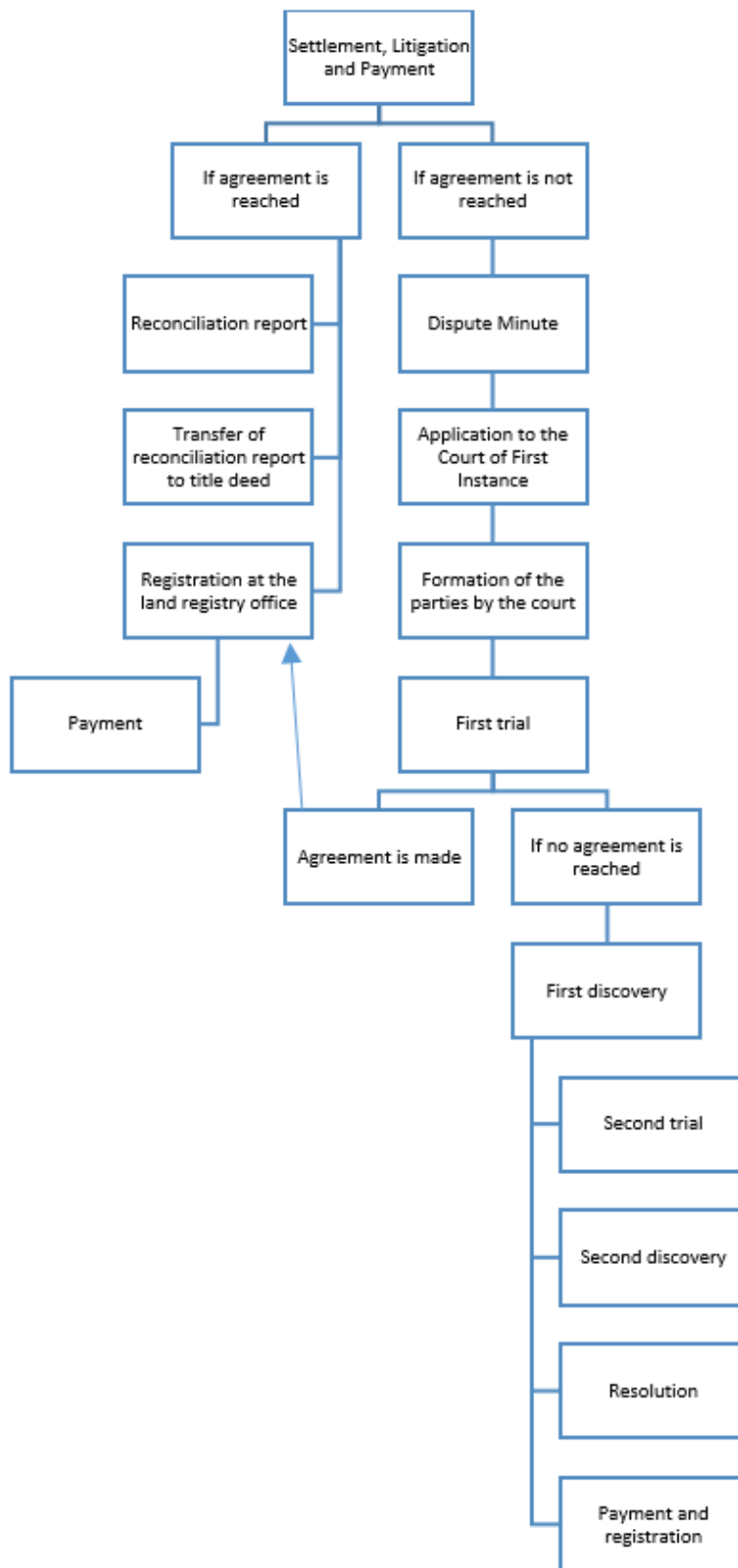
All expropriation activities performed by DSİ are based on the Expropriation Law No. 2942. In the event that the privately owned lands become subject to acquisition within the scope of the project, DSİ shall first turn to purchasing the land over settlement negotiations as per Article 8 of the Expropriation Law No. 2942. For the rightholders with whom an understanding could not be reached through settlement or whose addresses could not be found and for lands the ownership of which is disputed, a case is filed with the civil court of first instance for appraisal and registration as per Article 10 of the Expropriation Law. If the case filed for the appraisal of the expropriation price cannot be finalized within four months, legal interest shall be charged from the lapse of such duration on the appraised value. The expropriation price decided by the court as a result of the case filed shall be deposited to a bank account to be paid to the owner of the expropriated real estate. On the other hand, the expropriation prices for real estate the ownership of which is disputed or litigated shall be deposited to a three-month forward account and payment shall be made to the entitled person after the owner is known for certain.

Expropriation prices are determined by taking into account all factors impacting the value of the immovable in accordance with the criteria specified under Article 11 of the Expropriation Law. As per Article 11 of the Expropriation Law No. 2942, DSİ Value Appraisal Committees perform such appraisal by taking into account:

- a. The kind and type of the immovable or resource to be expropriated,
- b. Surface area,
- c. All characteristics and factors which may affect the value and the separate value of each factor,
- d. Tax return, if applicable,
- e. Appraisals performed by official authorities on expropriation date,
- f. For lands, the net income that could be derived from the immovable property or resource when used according to the location and conditions and as it is,

- g. For plots, the sale price of equivalent lands sold without any special purpose prior to the date of expropriation,
- h. For structures and buildings, official unit prices and construction cost calculation,
- i. by separately providing their answers on all such particulars and taking into account the statements made by relevant persons in the reasoned evaluation report they will draw up in accordance with the appraisal standards accepted by the Capital Markets Board and taking other objective criteria which would impact such appraisal of price.





Expropriation legislation in Türkiye does not require tenants, sharecroppers and informal users of real estate who have not made any enhancements whatsoever (building and/or trees) to be compensated. However, payments may be made to persons who prove their ownership with a legal document or through litigation. On the other hand, in the expropriation of a place the title deed of which is issued in another person's name, which is unowned or which is not acquired by its owner, the minimum price of the materials for the buildings and the price of the trees appraised as per Article 11 of the relevant law is paid to the owner.

Whereas the settlement method is taken as basis for acts and transactions related to expropriation practices, as per Article 27 of the Expropriation Law, in the event that the project is found to be urgent by the Presidency of the Republic of Türkiye the administration responsible for expropriation is authorized to seize the immovables necessary for the project in a much shorter time than defined under the normal expropriation procedures on the condition that the price ascertained by the court is deposited to a bank to the name of the owner. Such transaction does not pose an obstacle to owners' objection to the determined expropriation price. Accordingly, if a decision for seizure is taken, the responsible administration is obligated to finalize expropriation procedures over the normal methods within a reasonable amount of time. The owner of the immovable shall be invited to resettlement and in the event that no settlement is reached, again as per Article 10 of the Expropriation Law, a case for appraisal and registration shall be filed.

In the event that the immovables found necessary for rehabilitation projects belong to public agencies, the following methods are utilized in the acquisition of such immovables:

- Transfer as per Article 30 of the Expropriation Law
- Mutual transfer (trade-in) as per Article 26 of the Expropriation Law
- Transfer without charge as per Article 45 of the Law No. 5018,
- Allocation as per Article 47 of the Law No. 5018.

Which of the said methods is to be utilized shall be determined in line with the negotiations held and agreements reached with the owner agency.

3.2 APPLICABLE NATIONAL LEGISLATION ON LAND CONSOLIDATION

As per Article 44 of the Constitution of the Republic of Türkiye, measures aiming to protect and develop the cultivation/operation of the land for production purposes, to prevent loss of soil due to erosion and to provide lands to farmers who have no land whatsoever or have insufficient lands shall be taken by the state. Apart from that, the state is also able to appraise the size of land by taking into account different agricultural regions and various types of land.

Article 755 of the Turkish Civil Code No. 4721 sets forth that land reclamation works such as land consolidation and afforestation shall be performed mutually by the relevant land owners and that two thirds of land owners must decide upon said particulars on the condition that they own more than half of the land located within the project area. Specific provisions of law pertaining to this remain reserved.

DSİ is the main institution vested with land consolidation duties in Türkiye. Law No. 3083 on Land Reform Regarding Rearrangement of Land in Irrigated Areas and Law No. 5403 on Soil Preservation and Land Use serving as legal basis for land consolidation, Law No. 6200 on the Organization and Duties of the General Directorate of State Hydraulic Works and other legislation prepared in line with said laws authorize DSİ in this sense. However, within the scope of the Additional Article 9 of the Law No. 6200, other institutions and organizations are enabled to perform land consolidation pertaining to their own projects, subject to permission of DSİ.

On the basis of the mentioned law, General Directorate of DSİ implement 'Land Consolidation and On-Farm Development Services' projects for the acquisition of lands required for their projects. Land consolidation works are performed by DSİ on the basis of the provisions of following legal instruments:

- Law No. 6200 on the Organization and Duties of the General Directorate of State Hydraulic Works,
- Law No. 3083 on Land Reform Regarding Rearrangement of Land in Irrigated Areas,
- Law No. 5403 on Soil Preservation and Land Use
- Land Consolidation Implementing Regulation prepared in line with said laws
- DSİ Terms of Reference for Land Consolidation and On-Farm Development Services
- Law No. 6172 on Water User Associations,
- Agriculture Law No. 5488,
- Cadastre Law No. 3402,
- Municipality Law No. 5393,
- Special Provincial Administration Law No. 5302.

Whereas land consolidation works can be performed in a discretionary manner (with the consent of the majority of farmers), such works can also be carried out by necessity in cases where a public benefit is found. In both cases, the area subject to land consolidation shall be announced with a Presidential Decree. Such decision made by the President serves as a decision of public utility for land consolidation and other transactions.

During the first stage of land consolidation works, irrigated areas meeting the criteria for land consolidation are identified. For this assessment, site visits are performed as well as various desk-bound examinations (preliminary survey) to ascertain whether the site is suitable for land consolidation by addressing its different aspects such as topography, presence of fixed facilities (orchards, buildings etc.) and cadastre and ownership status. If the irrigated area is found to be suitable for land consolidation, in order to commence project works;

- Assent of the Presidency Strategy and Budget Office is sought, followed by
- The Presidential Decree announcing that the site in question is now a land consolidation site, issued through the Ministry of Agriculture and Forestry.

To start project activities, the locations announced as implementation area for land consolidation under the relevant Presidential Decree are also announced at said locations through methods suitable for the region in order to ensure that the farmers therein are notified of the land consolidation activities.

It is also sought that during land consolidation works, measures are taken to prevent potential grievances and loss of income on the side of the farmers. Additional Article 9 of the Law No. 6200 on the Organization and Duties of the General Directorate of State Hydraulic Works reads: "The damage to be caused to crops and integral parts on areas which are restricted due to land consolidation and the loss of income which may be incurred in such restricted areas until the delivery of new plots to owners of immovable property shall be covered by DSI or the project administration carrying out land consolidation." Thus, it shall be ensured that the prices of the parts and parcels such as trees, buildings etc. which are under the ownership of farmers located on the site where land consolidation is to take place, but remain within the portions left for the joint use of the public, are paid and that loss of income to be incurred during crop planning or delivery of new plots are compensated.

National legislation (Law # 3083) permits a deduction of land up to 10% for common use areas during land consolidation (e.g. transport roads and irrigation canals that increase the value and efficiency of each consolidated parcel and reduce border disputes). This deduction is called as Development Readjustment Share (DRS) and is equally cut from the parcels for the use as a transportation way to the existing lands and as a passing route for closed irrigation lines. Although considered as a land loss, it has advantages as written below:

- Minimizing the distance to the existing agricultural lands; reducing the need for labour and fuel for this work,
- Reintroducing the agricultural lands composed as a result of the ways formed by the ones to reach their own parcels by occupying and using one's land -which is a social problem- and not used for remaining as a way into agriculture again,
- Providing water for each parcel since the constructed routes of transportation ways and irrigation lines are the same,
- Reducing water use per unit area with the opportunities of irrigated farming, ensuring increase in yield and production depending on the adoption of irrigated farming and hence promoting the increase of agricultural income, and
- Supporting the increase in the value of land by planning the structure and location of the existing parcels in a more straight way and by adopting irrigated farming.

4. APPLICABILITY OF WORLD BANK'S ESF (ESS5 AND WB POLICY ON ACCESS TO INFORMATION)

4.1. GAP ANALYSIS BETWEEN THE NATIONAL LEGAL FRAMEWORK AND WORLD BANK'S ESS

Türkiye has a long standing history in the area of national legislation and procedures pertaining to land acquisition. Over the years, with the elimination of the problems faced, international best practices have been transformed into a national legislation and updated. However, there are still some discrepancies / gaps between the Turkish legislation and World Bank (WB) ESS 5. Such gaps and deficiencies relevant to Türkiye Water Circularity and Efficiency Improvement Project (TWCEIP) are addressed in detail here below. A summary of the gaps and measures to be taken against them is provided under **Table 5**.

Differences in Land Acquisition

Considering land acquisitions within the scope of Türkiye Water Circularity and Efficiency Improvement Project (TWCEIP), certain gaps exist between policies of the World Bank and the national legislation. These are as follows:

Resettlement Action Planning: No obligatory legal arrangements exist for the preparation of a Resettlement Action Plan including all displaced persons and homeowner families. Therefore, the preparation of an LAP is needed. DSI shall prepare Land Acquisition Plans for projects which require land acquisition/land consolidation.

Identification of Project-Affected Persons Including Vulnerable Groups: According to the Turkish legislation, only the legal owners of land are considered to be Project-Affected Persons (PAPs). Therefore, the losses of Affected Persons such as those who have no title deed, users of public lands, the host community, seasonal workers/migrants (making use of the project site) or persons displaced due to miscellaneous or economic reasons are not taken into account and no endeavors to eliminate such negative impacts caused by projects on said persons are envisaged. A large portion of said groups of people are not included within the definition of PAP as per the Turkish legislation as well.

Replacement Cost: According to World Bank policies, in the event of the loss of immovable property of the real estate kind all relevant replacement costs must be paid before construction starts. Whereas the 'land-for-land' method is an option for the lands disposed of, since the applicable legislation in Türkiye does not obligate the institution performing the expropriation to find another equivalent alternative for such lands, this method is not practiced in Türkiye. Considering that the payment of an amount equal to the replacement cost is a method of compensation, the losses of the legal owners of lands shall be compensated with tenants and unauthorized users becoming eligible to receive a replacement cost at the rate of the investment they made in the lands in question. The Turkish legislation concludes that only the legal owner of the land may receive monetary compensation with the price of depreciation (for expropriation) being deducted from such compensation; therefore, it is envisaged that the replacement cost shall be covered albeit at a lower rate than the replacement cost as specified under WB ESS 5. On the other hand, compensation for loss of income, access to common properties or social losses (such as lost opportunities) are not clearly provided for under the Turkish legislation. The full replacement cost covers lost lands and buildings. Under the Entitlement Matrix, certain mitigation measures such as the provision of left over lands and access to employment opportunities are stipulated for PAPs falling within the scope of the definition of WB ESS 5.

Compensation of Legal / Unauthorized Land Users: According to World Bank requirements, both the legal and the unauthorized users of a land are included within definition of PAP. Conversely, the Turkish legislation does not find the compensation of tenants and unauthorized users of lands/properties to be necessary.⁴ However, as per the Bank requirements, all kinds of structures, buildings, trees and cultivated crops of all Affected Persons are compensated for. WB ESS 5 also prescribes that those who incur losses to their income/livelihood as a result of being removed from the acquired lands as may be necessary should be compensated for their losses. Within this sense, the compensation paid should reinstate the livelihoods of tenants and other unauthorized users of the land at the level before displacement or better. Unauthorized users who have no legal right other than the legal compensation paid to the official owners of the land can be supported by social assistance funds under municipalities and/or district governorates. Unauthorized users shall be specified by the user surveys conducted during the site surveys.

Reinstatement of Livelihoods: Improvement of livelihoods and support during the transition period are not addressed in the Turkish Expropriation Law. No special arrangement for vulnerable groups or Persons Affected Severely (those who have lost more than 20% of their land or production resources) exists as well in the Turkish law. Expertise and resources are required for livelihood reinstatement support, support during the transition period and alternative income support. In order to reinstate livelihoods to their former state or improved to the extent possible, DSI shall collaborate with other institutions/organizations at the provincial level.

Public Disclosure, Engagement and Consultation Process: Provisions of the Turkish legislation on expropriation concerning public disclosure, engagement and consultation processes are limited. According to the Law, the institution implementing the expropriation procedures are obligated to notify the Affected Persons about the decision for expropriation. Negotiations and asset appraisal procedures shall also be carried out by the institution implementing the expropriation. The law defines no further consultation procedures. However, WB ESS 5 requires that the LAPF and project-specific LAPs be disclosed to the public in full. DSI shall announce the LAPF and the LAPs to the public on its website as well as providing briefing in public locations which all affected persons including vulnerable groups have access to. During expropriation and land consolidation processes, DSI shall ensure the continuity of the consultations with its own personnel and through Water User Associations. In addition to those legally entitled, DSI shall also notify other stakeholders including those who have invested in public lands or those who use the land without a legal right and tenants through official correspondence and consultation sessions in the same way that owners of lands and properties are notified. Such correspondence shall provide information on the relevant sub-projects and impacts stemming from the need for land. For the applications and requests made, feedback will be given to the owners and right holders.

Grievance Notification and Redress: In Türkiye, grievance notification is mostly made through official and legal mechanisms resting on the Expropriation Law No. 2942, Law No. 3071 on the Enjoyment of the Right to Petition and The Law No. 4982 on the Right to Information. In the current situation, DSI internally implements a four-stage GRM (for more detailed information, see the chapter on GRM). This mechanism shall be designed further to collect grievance notifications specific to the project. Such project-specific grievance

⁴ Amended Article 19 of the Expropriation Law sets forth that persons who have spent money to build/establish buildings and other structures on lands belonging to others shall be compensated in full for the price of trees and materials utilized in buildings. The price of materials utilized in buildings/structures must be at an equivalent rate enabling the purchase of a similar structure as per the social safeguard policies of the Bank.

redress mechanisms are appropriate for the use of Affected Persons and are of a quality to complement the official and legal mechanisms.

Monitoring and Evaluation: No specific practice exists with regard to the monitoring and evaluation of land acquisitions performed by way of expropriation. For monitoring, DSI shall establish basic performance indicators and carry out regular monitoring activities in intervals to be set in accordance with the scope and impact of the project.

Specific Differences in the Area of Land Consolidation

As per Additional Article 9 of the Law No. 6200 on the Organization and Duties of the General Directorate of State Hydraulic Works and the Land Consolidation Implementing Regulation dated 2019, land consolidation shall be performed in an optional manner after obtaining the consent of those who own more than half of the land in question and constitute more than half of the total owners or in a non-optional (involuntary) manner by considering the public interest upon the request of the Ministry or the relevant boards. The land consolidation project site is defined and consolidation activities are performed with a Presidential Decree. The expression 'optional' found in the mentioned texts point out to the fact that the consent of those who own more than half of the land in question and constitute more than half of the total owners should be obtained. For the 34 projects planned to be included within the scope of irrigation renovation (Kartalkaya Dam Irrigation, Karakuyu (Dombay) Irrigation and Kayseri Sarımsaklı Dam Irrigation) the non-optional and involuntary land consolidation method was selected to be used in land consolidation projects to be carried out on said lands.

In the literature for international standards on Involuntary Resettlement, the World Bank Involuntary Resettlement Sourcebook states: "Voluntary resettlement refers to any resettlement not attributable to eminent domain or other forms of land acquisition backed by powers of the state." Moreover, there are two other important issues; namely, 'informed consent' which refers to affected persons consenting by being informed about the subject and consequences of such consent and 'power of choice'. To continue from the Sourcebook: "Informed consent means that the people involved are fully knowledgeable about the project and its implications and consequences and freely agree to participate in the project. Power of choice means that the people involved have the option to agree or disagree with the land acquisition, without adverse consequences imposed formally or informally by the state. By definition, power of choice—and thus voluntary resettlement—is only possible if project location is not fixed. The route of a rural road, for example, could be changed if a landowner objected. The area of a reservoir behind a local dam, by contrast, is immutable. The former instance would allow for voluntary resettlement; the latter would not. To have only informed consent is insufficient without the power of choice." (Involuntary Resettlement Sourcebook, Planning and Implementation in Development Projects, IBRD, Washington, 2004)

Comparison of the project-specific land consolidation requirements against the World Bank policies and instruments reveals the following differences:

1. Land consolidation site is defined with a Presidential Decree and requires expropriation/decision of public utility, whereupon the land can be expropriated voluntarily or involuntarily.

2. Voluntary land consolidation may be performed in the event that 51% of the owners holding more than half of the lands within the project site (in number) give their written consent for land consolidation. The remaining owners have no choice to opt out, which presents a contradiction to the provisions of ESS 5. As per the legislation in Türkiye, it is considered sufficient that more than half of the right holders have requested for voluntary land consolidation, but for those who do not want the land consolidation, the judicial remedy is open and the final decision is made by the judicial power if there is an application.
3. In cases where land consolidation is performed on a legal basis, the amount of land can be reduced up to 10% for common and public utility spaces. Whereas no compensation is provided whatsoever for such reduction, the land that is reduced is left to landowners to enjoy this common utility. Said portion of the land cannot be acquired or owned by the party responsible for the relevant rights (in this case, DSI). Areas allocated for common utility are designated as areas under the full control of the state but not subject to ownership. Benefits obtained from land consolidation and irrigation which positively impact the productivity of lands following consolidation and which exceed the losses incurred due to said contributions paid lead farmers to opt for this reduction. For each additional piece of land seized (beyond 10%), either an equivalent piece of public land is allocated (if possible) and/or a right to compensation is extended by way of expropriation. All these issues are explained to the land owners in detail before and during project implementation. It has been determined through other projects carried out across the country that the benefit to be obtained from the irrigation project will improve with land consolidation, which is also explained to the land owners and positive feedback is received.

Even the best practices in Türkiye demonstrate that land consolidation with a 100% consent is not possible. There are various reasons why 100% consent cannot be reached in land consolidation:

- Failure to reach owners living in other cities or abroad,
- Lack of information on land consolidation and the benefits it provides,
- Attachment to inherited land,
- Enmity with owners of neighboring lands,
- The owner being pleased with the existing location of the land in question.

Following the announcement of the decision for consolidation, a series of consultation sessions are held to eliminate the reasons listed here above. The purpose of the consultations is to decrease the number of PAPs who would participate in the land consolidation program involuntarily. Therefore, in order to increase the level of participation to land consolidation, the continuity of consultations is important.

Another problem area within the scope of the land consolidation practices is the mandatory reduction of up to 10% from the land amount for public access roads and other services as mentioned here above. Whereas the reduction of land amount at the rate of 10% through this method may be perceived as a kind of land consolidation activity, said portion thus reduced can only be used for public services (roads, irrigation network etc.) which again serves the benefit of the land owner/user, with the land in question not being under the ownership of anybody but open for use by all. That being said, it was observed in land consolidation practices followed that this contribution is not actually 10% but at the average rate of 5-6%. From the perspectives of the Bank's requirements, all kinds of losses need to be compensated; however, as a result of the benefit obtained from land consolidation the value of lands increase. In parallel to the project's purpose of

modernizing existing irrigation schemes on such lands, the project is not expected to bring negative but provide positive impacts on the land.

ESS 5 shall be implemented in the land consolidation works performed by DSI in line with the project objectives. DSI will ensure that 1) that people have agreed to the land consolidation including the balancing and entitlements and record these, 2) due diligence is undertaken to assess the additional measures provided to affected people by the government to ensure that no one is worse off (otherwise there will be corrective actions)

With the assistance of the GRM operating under DSI, all kinds of positive and negative feedbacks and complaints concerning land consolidation can be conveyed. DSI will try and resolve and respond to such feedbacks and complaints within the framework of irrigation modernization activities to the extent possible. Whereas ESS 5 is not applicable to the systems being discussed, DSI shall follow up on the situation after consolidation and keep in contact with the Affected Persons to resolve objections and grievances which may be faced (within the scope of the Project, to the extent possible). Records of all kinds of objections and grievances notified and resolved shall be held by DSI. In our projects carried out within the scope of TIMP, some setbacks occurred in terms of hesitating to respond to the requests, complaints and suggestions made verbally by the beneficiaries to the DSI or WUA personnel or contractor officials in the field at the beginning of the project due to them not being made in writing or recording the meetings held for informational purposes from time to time. However, over time, the problems were mitigated through discussions and notices with the Administration staff, WUA staff and contractor officials. In order to avoid similar problems in this project, both the Administration staff, WUA and the Contractor will be informed at the beginning of the project implementation and due diligence will be ensured.

In addition to the consultation processes and the resolution of the objections and complaints notified through the GRM mentioned here above with relation to land consolidation, DSI will prepare a LAP acceptable to the Bank following ESS 5 prior to the construction works to be performed with a view to consolidating the land for irrigation modernization under the specified conditions. The plan shall be prepared following the disclosure of the final design. Within the plan DSI shall illustrate the baseline conditions of lands subject to consolidation by specifying the particulars of the Land Consolidation process they will follow in order to minimize the number of modernization works-related PAPs (both legal and unauthorized land users), grievances and additional land acquisition which may result in expropriation. Similar to scheme-specific LAPs, the measures defined under this LAPF shall be taken to restore or improve livelihoods to pre-project level the livelihoods of PAPs in all necessary cases. Actions taken within the scope of LAPF will be regularly followed up on along with LAPs over the six-monthly reports. DSI will also keep a record of all objections and grievances received and resolved during consultations, through the GRM and over the six-monthly monitoring reports.

Table 6. Gap Analysis and Measures for the Elimination of Differences

	Gap/Deficiency	Turkish Legislation	World Bank Policy Requirements	Measures for the Elimination of Deficiencies
LAND ACQUISITION				
1	Resettlement action planning	No legal arrangements exist concerning the preparation of a Resettlement Plan to cover all displaced persons and host communities.	World Bank policy requires the preparation of a Resettlement Action Plan.	Whereas project activities do not require physical resettlement, in some irrigation projects displacement in the economic sense is expected to happen due to partial expropriation (mostly related to easement rights). Project specific Land Acquisition Plans (LAP) shall be prepared and implemented by DSI.
2	Value Appraisal Method	For lands that are disposed of, the applicable legislation does not require the institution performing the expropriation to carry out an investigation into alternative lands of equivalent value; which means that the 'land-for-land' method is not applied in Türkiye. Buildings are compensated for over the cost of construction with the deduction of depreciation. Lands for dwelling are compensated for over their market price.	Loss of fixed assets and immovable property such as land and the like should be compensated over the full replacement cost before construction. The 'land-for-land' method is another option for lands which are disposed of. No such deductions may be made with connection to depreciation.	The full replacement cost shall be paid in return for the land and buildings disposed of.
3	Reinstatement of Livelihood	Expropriation Law does not contain any provisions on the reinstatement of livelihood and the assistance to be provided during the transition period.	World Bank policy requires that displaced persons are assisted in their endeavors to improve their former living standards, income generation capacities and levels of production or that at least such standards and capacities are brought back to the pre-project levels.	Whereas the impacts on livelihood are expected to be positive rather than negative, mitigating measures against possible negative impacts which may stem from land consolidation or construction activities within the scope of the Project shall also be taken. The assistance to be provided in reinstating the livelihood, transition period and creation of alternative sources of income requires expertise and resources. Collaborating with the Provincial Directorate of Agriculture and Forestry, the Provincial Directorate of Family and Social Policies, the Governorate, District Governorates and Municipalities at the provincial level, DSI shall try and reinstate livelihoods to the extent possible in line with the alternatives proposed under the Entitlement Matrix.
4	Losses of squatters and unauthorized users including vulnerable groups.	According to the legislation, PAPs are legal owners who lose land. Seasonal workers/migrants or economically displaced persons are not considered to fall within the scope of PAPs. The law requires that the buildings and crops of both legal owners and unauthorized users of public lands are compensated. However, no provision for compensation	Economically displaced persons, seasonal workers and other vulnerable groups should be considered within the scope of PAPs as well. Regardless of their status of ownership, all PAPs shall be compensated for the losses they incur.	Within the scope of the project-specific Land Acquisition Plans (LAP), all PAPs regardless of the status of ownership shall be identified and measures shall be taken for the compensation of all land users. One or several of the following measures shall be implemented by DSI in the reinstatement of livelihoods for all Affected Persons having the status of unauthorized user: (1) DSI shall support unauthorized users in obtaining the legal ownership of their lands to the extent possible.

		exists for unauthorized users on pastures and forest lands.		<p>(2) DSİ will provide unauthorized users with purchase options on DSİ-owned lands to the extent possible.</p> <p>(3) Unauthorized users will be informed about such land rental or purchase options by the General Directorate of National Estate.</p> <p>(4) DSİ will provide information to those interested on how to apply to district governorates to benefit from İŞKUR's Social Benefit Program or to the relevant Social Aid and Solidarity Foundations to obtain funds.</p> <p>(5) DSİ will ensure that contractors prioritize unauthorized users within the framework of the job/employment opportunities under the project.</p>
5	Consultation and Disclosure of Information	<p>Turkish legislation on land acquisition contain limited provisions concerning the disclosure of information to the public, taking the opinion of the public and public participation.</p> <p>The institution performing the expropriation is legally obligated to notify PAPs of such decision for expropriation.</p> <p>Negotiations and consultations and the appraisal of assets is also carried out by the institution performing the expropriation.</p> <p>Whereas no obligation exists for the preparation of a Stakeholder Engagement Plan, no further consultations are legally required.</p>	<p>As per ESS 5:</p> <ul style="list-style-type: none"> The LAPF and scheme-specific LAPs shall be disclosed to the public in full. All stakeholders are provided with an equal opportunity in accessing Project instruments and voicing their opinions on such instruments. Consultation sessions shall be held at a location accessible to all who wish to participate. Consultations shall also be made with vulnerable groups. 	<p>DSİ shall announce the LAPF and the LAPs to the public on its website as well as providing information on the issue at hand in public locations which all affected persons including vulnerable groups have access to. During expropriation and land consolidation processes, DSİ shall ensure the continuity of the consultations with its own personnel and through Water User Associations. In addition to those legally entitled, DSİ shall also notify other stakeholders including those who have invested in public lands or those who use the land without a legal right and tenants through official correspondence and consultation sessions in the same way that owners of lands and properties are notified. Such correspondence shall provide information on the relevant sub-projects and impacts stemming from the need for land.</p> <p>DSİ shall prepare a Stakeholder Engagement Plan.</p>
6	Grievance Redress Mechanism	A grievance redress mechanism at the national level is made available for the use of all Affected Persons.	A grievance redress mechanism designed specifically for the project is needed.	Currently, DSİ operates a four-stage GRM. This mechanism shall be developed further for the collection of project-specific objections and grievances (for detailed information, see: LAPF, Chapter: GRM). Said grievance redress mechanisms at the project level are complementary elements and cannot substitute the legal mechanisms extended to Affected Persons upon their request.

7	Monitoring and evaluation	The Turkish law does not house any monitoring and evaluation practices relevant to land acquisition.	Arrangements for the monitoring, implementation and impact assessment of LAPs should be prepared in accordance with the requirements of World Bank policies.	Project-specific monitoring and evaluation shall take place and defined within the scope of the project-specific LAPs. DSI shall determine basic performance indicators for monitoring and perform internal and external monitoring activities at regular intervals (for more detail, see: LAPF, Chapter: Monitoring and Evaluation).
LAND CONSOLIDATION				
8	The practice of involuntary land consolidation	As per the legislation in force, land consolidation may be performed in an optional or in an involuntary manner without seeking the consent of the owners.	According to the Bank policies, <u>no Resettlement may be based on other forms of land acquisition backed by public interest or powers of the state.</u> The two main principles to keep in mind here as per the Bank policies are: i) informed consent ii) power of choice .	As per the requirements of ESS 5 within the scope of land consolidation, DSI shall prepare LAP acceptable to the Bank following ESS 5 prior to the construction works to be performed with a view to consolidating the land for irrigation modernization. Within the plan DSI shall illustrate the baseline conditions of lands subject to consolidation by specifying the particulars of the Land Consolidation process they will follow in order to minimize the number of PAPs (both legal and unauthorized land users), grievances and additional land acquisition. The measures defined under the present LAPF shall be taken to restore or improve livelihoods to pre-project level the livelihoods of PAPs in all necessary cases. Actions taken within the scope of LAPF will be regularly followed up on along with LAPs over the six-monthly reports.

In the event of discrepancies between the national legislation/arrangements and ESS 5, the present LAPF congruent with ESS 5 shall prevail within the scope of the project.

5. CHARACTERISTICS OF PROJECT SITES

5.1. Overall Characteristics

Kayseri Sarımsaklı Gravity and Pump Irrigation project site is located in the Central Kızılırmak Basin within the Central Anatolia Region. It remains 30 km to the east of Kayseri province. Kayseri Sarımsaklı irrigation scheme is fed by the Sarımsaklı Dam on Bünyan Brook, which was commissioned in 1968.

Afyonkarahisar Dinar Karakuyu Pump Irrigation project site is located in the Basin of Lakes to the southwest of Türkiye, within the boundaries of Dinar district located in southwestern Afyonkarahisar province. Dinar district is surrounded by the districts of Kızılören and Sandıklı in the north, Şuhut in the northeast, Senirkent and Uluborlu in the east and southeast, Keçiborlu in the south, Basmakçı and Evciler in the west and southwest and Çivril in the northwest. Dinar is located to the northwest of the Lakes Region of the Mediterranean Region and serves as a junction for Isparta-Denizli, Afyon-Denizli, Konya-Denizli and Afyon-Antalya highways.

Kahramanmaraş Pazarcık Kartalkaya Irrigation Project site encompasses the irrigated area of Kartalkaya Dam operating within the boundaries of Kahramanmaraş province in the Mediterranean Region of Türkiye. It is located within the Central Ceyhan Basin. The Central Ceyhan Basin is located in the south of Türkiye, between the latitudes of 37° 26' 92" – 37° 15' 30" North and the longitudes of 37° 11' 22" – 37° 01' 58" East.

5.2 Details on the Socio-Economic Characteristics of Project Sites

Data on the distribution of male and female population in the settlements located within the area housing the mentioned irrigation schemes are obtained from planning reports of projects received from relevant Regional Directorates and are provided in the table below.

Table 6. Population Information on Selected Irrigation Schemes

Irrigation Scheme	Women	Men	Total
Kayseri Sarımsaklı Irrigation	9,448	9,693	19,141
Afyonkarahisar Karakuyu Pump Irrigation	386	364	750
Kahramanmaraş Pazarcık Kartalkaya Irrigation	13,329	14,206	27,535

According to the censuses performed between 2013 and 2021, the population in the neighborhoods falling within the scope of the **Kayseri Sarımsaklı Gravity and Pump Irrigation** Project have displayed an increase. Looking at the breakdown of population density, 50.64% male and 49.36% female population live in the relevant neighborhoods.

Neighborhoods of Akcatepe, Akin, Buğdaylı, Elagöz, Güneşli, Salur, Yazır under Kocasinan district and Yeşilyurt under Melikgazi district have primary schools. Besides that, neighborhoods of Buğdaylı and Güneşli under Kocasinan district and Yeşilyurt under Melikgazi district also have secondary schools.

Agriculture and stock farming activities are the means of livelihood for the neighborhoods within the scope of the project. Cereals (wheat, barley, rye, oats etc.), industrial plants (sunflower, sugar beet, potatoes etc.), legumes (chickpeas, beans, green lentils etc.) and fodder crops (clovers, trefoils, vetch etc.) are being cultivated in said neighborhoods.

Afyonkarahisar Dinar Karakuyu Pump Irrigation: According to census results, the population in the neighborhoods display a decrease over the years. Whereas owners of the plots are mostly inheritors, the lands are cultivated by shareholders who have settled down in the villages.

Although the villages of Karakuyu, Burunkaya and Gökçeli have primary schools, they are unused and mobile teaching practices are being implemented. Akgün Village has one primary school in operation.

The economy of the villages is based on agriculture and stock farming. Barley, wheat, chickpeas, sunflowers, maize, sugar beets, poppy and fodder crops, onions, potatoes and various vegetables and fruits such as apples, cherries, pears and grapes are being cultivated in the villages.

Kahramanmaraş Pazarcık Kartalkaya Irrigation Scheme: The population within the neighborhoods under the districts of Pazarcık, Dulkadiroğlu and Türkoğlu which fall within the scope of the Project has shown an increase between the years of 2015 and 2021. Looking at the average for the neighborhoods under the three districts, population distribution is 51.59% male and 48.41% female. The irrigated area contains 53 settlements having the status of neighborhood under Pazarcık, Dulkadiroğlu and Türkoğlu districts of Kahramanmaraş province. The irrigated area is also intersected by the Kahramanmaraş-Gaziantep Highway. Moreover, the same road connects surrounding villages to the center of the township of Narlı. The irrigated area remains to the southeast of Kahramanmaraş province. With the implementation of irrigation modernization, income from unit area on the irrigated zone shall increase, additional employment opportunities shall be created and better living conditions shall be established in the economic sense and population shall increase within surrounding villages suffering from migration. Of the lands of the district, 50% is covered by forests. 40% is utilized as farmland, 7% as orchard, 1% as pasture and 1% as vegetable patch, with another 1% remaining unused. The most popular crops in the plain are cotton, wheat, maize, sunflowers and sugar beets. Cotton is the most profitable agricultural product within the region. Red peppers is another very popular crop. Narlı is famous for its red peppers.

5.3. Vulnerable Groups

Generally, vulnerable groups mean persons who live below the poverty line, persons who have no lands, the elderly, women, children and persons who may be impacted more negatively by resettlement due to their gender, ethnicity, age, physical or mental disabilities, economic disadvantages or social status and who may have a limited capability to benefit from and obtain resettlement assistance and related development benefits.

Potential vulnerable groups in the project area are identified by evaluating socio-economic surveys conducted in the field, population information based on addresses, and data obtained from the district governorship and local administrators as a whole. Since detailed information on persons located within the project sites and defined as Vulnerable groups will be provided in project-specific LAPs, no data exists yet at this stage for said projects.

6. ELIGIBILITY AND CATEGORIES OF AFFECTED PERSONS

6.1. ELIGIBILITY CRITERIA AS PER WB ESS 5

WB Eligibility Classification

Project-Affected Persons (PAP) are classified as (a) those who have official legal rights on land or assets, (b) those who have no official legal rights on land or assets yet have a claim on such land or assets, (c) those who have no admissible legal rights or claims on the land or assets they occupy or use.

Persons under all three categories have the right to receive some kind of assistance within the scope of ESS 5; yet, the nature of this assistance may vary as explained in the following paragraphs of ESS 5.

(a): Persons who have legal rights on land or assets are those who have official ownership certification as per the national law or whose special situation is legally acknowledged. Either the property belonging to such persons is registered with the land registry or they may have a rental agreement within the context of the right of disposition pertaining to the property. Thus, they hold legal rights. DSI commits to pay the expropriation price to rightholders of this kind.

(b): There may also be persons who have no legal rights on land or assets but who have a claim which is acknowledged or admissible under the national law. Such persons may have been using the land for generations without any official certificates within the scope of the traditional or non-traditional easement right acknowledged by the national law. In other cases, an official title might not have been given or the relevant documents and certificates may be deficient or missing.

(c): Persons who have no admissible legal right or claim on the land or assets they occupy or use are eligible to receive assistance within the scope of ESS 5. Such persons may consist of seasonal users of resources such as herders, grazers, fishers or hunters (if the rights of these users are acknowledged by the national law, they can be included under category (a) or (b). In addition, they become eligible to receive compensation for resettlement, livelihood assistance and assets owned. These groups receive a share from economic activities in the region in parallel with the intensity of agricultural activities in the area. As a result of the irrigation renovations to be carried out within the scope of the project, they will indirectly benefit from the gains since the agricultural activity will also increase. For these groups, no negative impact is expected after the project, on the contrary, it is believed to contribute positively.

6.2. ELIGIBILITY CRITERIA

PAPs should be assisted in improving their of previous living standards, income generation capacities and productivity or at least in restoring the same to the levels before project implementation. Rightholders having no official certification showing their rights does not obstruct their receiving compensation or rehabilitation assistance. Affected persons can be classified as follows:

- Persons who have official legal rights on land or assets,
- Those who have no official legal rights on land or assets yet whose claims are acknowledged or admissible within the scope of the Turkish legislation,
- Persons who have no admissible legal right or claim on the land or assets they occupy or use.

Generally, right to compensation or additional support shall only be conferred for those assets which are specified during the identification (stock/inventory taking) of the assets belonging to project-affected persons. In the event that the buildings on the land are damaged, new buildings constructed and additions made after the date on which expropriation commences officially shall remain outside of scope. Owners or

users of such buildings cannot have any right to receive compensation and additional assistance (except for cases where it is proven that such buildings could not be identified to fall within the scope of affected assets during the stock/inventory taking of assets).

6.3. CATEGORIES OF PROJECT-AFFECTED PERSONS

Potential impacts of the project are limited to the economic displacement of (i) lands and buildings thereon utilized for dwelling and horticultural or agricultural activities, other immovable property and crops all of which shall be seized in connection with land acquisition, (ii) persons living off of such lands (owners or users).

Sub-projects under the irrigation component of the project contains lands previously expropriated for channel routing and access roads. In project works, land consolidation shall be prioritized. It is considered that the need for expropriation will be avoided or be at the minimum in the areas which are going to be subject to land consolidation or which have already been consolidated (see: Table 2: Estimated Land Acquisition Requirements for the Selected Irrigation Schemes and WWTP Systems). Therefore, in projects where land consolidation is implemented, the potential negative impacts of the overall project would be at the lowest level.

Moreover, since in renovation projects the entire irrigation network is designed in the form of a closed (pressurized pipe) system, it is expected that the project-related works will not require physical resettlement.

In modernization projects which are found to be unfit for land consolidation, the formerly expropriated channel routes will be used and in case of changes to such routes, expropriation of ownership or easement rights may become necessary. As mentioned before, since pipe systems are taken as basis in the design of renovation projects, expropriation is expected to happen only for additional roads with the expropriation of easement rights being preferred in other areas. Thus, the reduction of the agricultural lands currently utilized by farmers will be prevented, minimizing the negative impact of renovation projects on the farmers.

Since the irrigation projects considered within the project scope currently are in the form of open channels/flumes also known as the "traditional system", expropriation shall take place accordingly and at high amounts. Since the pipe system requires less land, formerly expropriated areas will become unused under the new conditions. Portions of such areas which can be used in agriculture may be given to farmers in the region in return for their immovable properties after reclamation; and in cases where this is impossible, they can likewise be sold for use as agricultural land.

Owing to the fact that pump irrigation schemes included within the scope of renovation already having pump stations and energy transmission lines, no additional need for expropriation is foreseen. However, in case of a need, expropriation of ownership will be resorted to for pump stations and pylon locations with easement rights being established for energy transmission lines.

Whereas energy transmission lines can be established by DSI and transferred over to the relevant electricity distribution institutions for operation, the construction may also be handed over to the relevant

institution through a protocol to be signed between the two institutions, on the condition that the costs are covered by DSI.

Construction works within the scope of the sub-projects under the project shall be planned in a manner not to disrupt existing irrigation activities. Table 7 summarizes the rights of disposition to be established concerning ownership under Türkiye Water Circularity and Efficiency Improvement Project (TWCEIP).

Table 7. Rights of Disposition to be Established Concerning Ownership

Project Component	Right to be Established	Duration
Construction route	Term easement	2-9 years
Irrigation pipeline	Perpetual easement	49 years
Storage area / facility	Ownership right	Permanent
Pump station	Ownership right	Permanent
Access roads	Ownership right	Permanent
Energy transmission lines	Ownership right for pylon locations, easement right for transmission lines	Permanent for 49 years at pylon locations

Considering the land needs of the project, when compared with the positive impacts the negative impacts are expected to remain at the minimum. The purpose of the project is to minimize the land acquisition requirements under the proposed systems and plans through land consolidation. In cases where expropriation is unavoidable, measures shall be taken to mitigate the negative impacts stemming from land acquisition within the scope of the project. Direct impacts on persons and communities are explained here below.

Project-Affected Persons (PAP): There are three groups of PAPs expected to be impacted directly within the scope of the project as i) water users who are WUA members, ii) water users who are not WUA members and iii) agricultural workers. Each of these three categories has sub-categories with further individuals who may be impacted by the project. Table 8 displays the sub-categories of each group of affected persons.

Table 8. Categories of Directly Affected Persons

#	Member Water Users	Non-Member Water Users	Agricultural Workers
1	Land owners	Persons performing irrigation with well water	Seasonal workers (from Adiyaman, Urfa and other provinces)
2	Tenants	Persons the plot which they own remains outside of or away from the WUA service area	Day workers from neighboring settlements
3	Inheritors	Persons whose rental agreement is unfit for membership	Migrant seasonal workers
4	Persons renting Public Lands	Persons who are unable to become a member due to inheritance	Female workers
5	Women	Persons who do not own lands	Children over the age of 15
6		Land owners who do not cultivate their land but lease it to others	Water bearers
7		Women	Overseer workers

Groups defined under Table 8 apply for all sub-projects.

DSİ shall organize stakeholder engagement and consultation meetings to identify the above specified PAP categories from the commencement of each project. In order to be able to ascertain and meet the needs of both member and non-member water users, a close cooperation and coordination will be established with Water User Associations. DSİ shall make additional efforts to ensure the involvement and engagement of women to the processes in each scheme and organize separate consultation sessions and meetings as necessary. All PAPs impacted directly will be regularly informed about project planning, construction schedule and operation. DSİ shall also ensure that PAPs are aware of the existence of the GRM within the scope of the Project.

At the same time, DSİ will identify workers who are working on the lands which are the subject of activities during meetings to be held with land owners and inform land owners on the construction schedule so as to allow them to warn the workers about the duration/periods wherein they will be left unemployed in a timely manner.

Vulnerable Groups: With consultation meetings and site visits to be organized throughout land consolidation and land acquisition activities, DSİ shall identify the vulnerable groups which may exist in the area housing each scheme. Female farmers, seasonal workers (including refugees), farmers who have no lands or are deprived of their lands, users of public lands, landowners at the end of irrigation channel/system, elder farmers, and disabled landowners will be identified and informed about the project and their rights if they are to be impacted by the project. DSİ shall implement the entitlement matrix for the compensation of vulnerable

groups for their losses caused by the project and ensure that special measures are taken. Said vulnerable groups are explained in detail under Table 9 here below.

Türkiye is a country which is a party to several ILO conventions on numerous issues including but not limited to equal treatment of workers, gender equality, child labor, forced labor, OHS, right of association and minimum wage. Within this sense, the current Labor Law No. 4857 meets the international labor standards applicable in such areas as child labor, forced labor, non-discrimination, equality of opportunity and right of unionization. DSİ shall ensure that all works including those performed by contractors are congruent to the national legislation. On the other hand, Labor management plans shall be prepared for each sub-project and employment shall be maintained in line with the plans.

Table 9. Vulnerable Groups

Vulnerable groups	Definition of Vulnerability	Possible Impacts
Female farmers	This group includes female farmers who are highly dependent on the land and who are engaged in agricultural activities within the WUA service area.	Social habits and cultural obstacles may render the participation of women difficult.
Non-land owner users	This group includes persons who rent or use lands belonging to other persons without having their own lands.	The rights and title deeds of land users whose rights can be legitimized shall be done so, with users whose rights cannot be legitimized facing possible loss of their lands.
Persons using public lands	Persons using public lands may have no lands or own other lands.	In the event that the relevant public lands are included within the scope of expropriation, these users may lose their access to said public lands.
Seasonal agricultural workers	Seasonal agricultural workers a portion of which may also include refugees are employed to work in agricultural activities (planting, harvest) for the duration of the seed time and are thereupon sent back to their homes. Children of these families may also be employed in agricultural activities.	Large scale irrigated farming activities may require the employment of numerous seasonal workers. However, mechanization also decreases the need for temporary labor. DSİ shall ensure that no child labor is utilized in the activities within the scope of the project.
Small land owners	These are owners of small scale lands. The size of land varies from region to region. The total amount of land owned by such land owners remains below the minimum size of land to generate income as prescribed by the MoAF.	<u>Positive impacts:</u> These farmers will have opportunities to access irrigated land resources of a better quality as a result of land consolidation. <u>Potential negative impacts:</u> Costs of electricity and water utilities for these farmers will increase as a result of irrigation activities. Since these individuals are small-scale producers, they may not have the monetary means to cover such expenses. Regardless of the size of land owned, the same cost structure is being implemented for all users.

7. ENTITLEMENT

7.1. PRINCIPLES ON COMPENSATION FOR PAP AS PER WB ESS 5

In cases where limitations (permanent or temporary) on land acquisition or land use cannot be avoided, project-affected persons will be compensated over replacement cost and support will be provided to improve their life standards or at least restore them to their former level as necessary. On the request of affected persons, if partial expropriation would leave the remaining ones economically unviable or render the remaining plot unsafe, inaccessible for persons or usage, it may be considered to purchase the remaining unusable parts for those who requested the expropriation of the entire plot. DSI agrees to fulfill this condition in expropriation works and transactions.

It will be ensured that compensation for loss of assets is enough to cover the replacement cost. Process of determining the compensation price must be transparent and easy to understand for project-affected persons.

Potential effects of the project are expected to be (i) loss of land used for agricultural purposes, (ii) loss of structures and other assets, (iii) loss of crops, and (iv) loss of land-based livelihoods. Since renovation constructions will be planned in a way that will not hinder irrigation, it is envisioned that losses due to irrigation will not occur.

Land requirements of projects may necessitate the establishment of proprietary or easement rights. Permanent land acquisition will necessitate the establishment of proprietary rights while temporary land acquisition will necessitate the establishment of easement rights. On lands with easement rights, the land remains in the possession of proprietors, with certain restrictions. Restrictions include not constructing any structures, not planting deep rooted plants or trees, and allowing the land to be used to a certain level. All forests and pastures, regardless of under whose ownership they remain, are subject to State control, and there are no forests or pastures exclusive to the project sites. Access to forests and pastures are regulated pursuant to the national legislation.

The following are taken into consideration while calculating the replacement cost regarding lands and other assets:

(a) Agricultural Land (Fallow Included) / Pasture Land: A compensation equal to the replacement cost will be paid to cover the losses incurred by those entitled based on net return management.

(b) Lands Located In Urban Areas (plots): A compensation equal to the replacement cost will be paid to cover the losses incurred by those entitled considering the current market value of assets (ruling prices, value obtained by comparison with their equivalents).

(c) Houses and Other Structures (Including Public Buildings Such As Schools, Clinics, Places of Worship): Communiqué on approximative unit prices for construction issued by the Ministry of Environment, Urbanization and Climate Change will be taken into account and appraisal activities will be performed within the scope of WB ESS 5 standard in covering the losses incurred by those entitled.

(d) Loss of Access to Natural Resources: Loss of access to natural resources is not expected to occur within the scope of the project. However in cases where PAPs incur such losses, the financial loss will be compensated in line with ESS5.

7.2. RIGHT TO COMPENSATION

Immovables in project implementation areas may be used by both the land owners and users who are not owners. In the event that these lands are expropriated, both the land owners and other users of the land will be compensated over an amount compatible with the legislation in force that is sufficient to obtain equivalent immovables. Those who use these lands may be legal or unauthorized users. A method following the Turkish legislation and WB ESS 5 standard will be used in the compensation of integral parts and innovations owned by unauthorized users.

Work progress and plan will be arranged in a way not causing a loss of income during the implementation of the project for proprietors, users, seasonal workers and individuals living in these lands. All losses and damages which may arise nevertheless will be compensated in accordance with the legislation.

As per WB ESS 5 standard, individuals to be entitled due to the results of activities to be performed and how the losses will be compensated is defined in the Entitlement Matrix.

ENTITLEMENT MATRIX

Table 10. Entitlement Matrix

Entitlement Subject	Affected Persons/Communities	Type of Compensation	Additional Provisions
Land			
1. Indefinite loss of land/proprietary right	1.1. Land owners	<ul style="list-style-type: none"> • Compensation in cash over the replacement cost to cover the acquisition of the equivalent immovable. • Exchangeable lands of equivalent characteristics and value will be searched for the willing, if available, effort will be shown for exchange. 	Expropriation works and transactions will be performed in accordance with the legislation in force. Lands and fixed assets are compensated with a suitable replacement cost and in a manner allowing Affected Persons to acquire equivalent assets (to be appraised on the project commencement date).
	1.2. Land users whose rights are legitimizable (i.e. those with customary rights to land)	<p>The land users with customary rights to land will be helped to obtain title deeds for the subject lands. If temporary loss is suffered for such lands with title deed, the following method of compensation shall apply:</p> <ul style="list-style-type: none"> • Compensation in cash over the replacement cost to cover the acquisition of the equivalent immovable. • Exchangeable lands of equivalent characteristics and value will be searched for the willing, if available, effort will be shown for exchange. 	Expropriation works and transactions will be performed in accordance with the legislation in force. Lands and fixed assets are compensated with a suitable replacement cost and in a manner allowing Affected Persons to acquire equivalent assets (to be appraised on the project commencement date).
2. Temporary loss of land (establishment of easement rights and restrictions on land use)	2.1. Land owners	The easement right fee for the land stipulated by the Law will be compensated.	The mentioned land will be restored to a usable status before it is delivered to the owner.
	2.1. Land users whose rights are legitimizable (i.e. those with customary rights to land)	<p>The land users with customary rights to land will be helped to obtain title deeds for the subject lands. If temporary loss is suffered for such lands with title deed, the following method of compensation shall apply:</p> <p>The easement right fee for the land stipulated by the Law will be compensated.</p>	The mentioned land will be restored to a usable status before it is delivered to the owner.
Buildings / Trees and Crops			

Entitlement Subject	Affected Persons/Communities	Type of Compensation	Additional Provisions
3. Structures (residential buildings)	Immovable owners and immovable users (including unauthorized users)	<ul style="list-style-type: none"> Cash compensation over full replacement cost in accordance with the legislation. 	Leaving the salvaged materials after demolition of the building to the entitled, for the willing.
4. Non-residential structures (barns, irrigation facilities, fences, etc.)	Immovable owners and immovable users (including unauthorized users)	<ul style="list-style-type: none"> Cash compensation over full replacement cost in accordance with the legislation. 	Leaving the salvaged materials after demolition of the building to the entitled, for the willing.
5. Trees	Immovable owners and immovable users	Compensation at net present value for trees with economic value (considering the type, age, market price etc. of the tree)	Leaving the salvage to the entitled, for the willing.
6. Crops	6.1. Crop owners with title deed for the land	Cash compensation over sales value received by the producer at harvest time for expected crop quantity.	Waiting for a period to harvest crops to avoid crop loss, when possible.
	6.2. Crop owners with no title deed for the land (including unauthorized users)	Cash compensation over sales value received by the producer at harvest time for expected crop quantity. Affected persons submitting a document of ownership ⁵ for the crops or DSÍ determining ownership or DSÍ giving enough time to harvest the crops	<ul style="list-style-type: none"> Waiting for a period to harvest crops to avoid crop loss, when possible. Informing the affected persons about the requirement to obtain a document of ownership
Loss of land based livelihoods	<p>7.1. Land owners (who lost more than 20% of their land of total agricultural landholding)</p> <p>7.2. All other entitled individuals (such as customary land users and informal land users)</p> <p>7.3. Vulnerable groups</p>	<p>DSÍ will fulfill one or more of the listed opportunities to restore livelihoods:</p> <ol style="list-style-type: none"> Helping surplus Treasury immovables to be transferred to the ownership of unauthorized users. When possible, DSÍ will allow the sale of lands it owns for the unauthorized users in accordance with the Law in force. DSÍ will inform project-affected persons about the possibilities of renting or purchasing a new land from General Directorate of National Estate. 	<ul style="list-style-type: none"> DSÍ choosing to benefit primarily from public lands for the project's permanent land acquisition requirements during the modernization of irrigation schemes When possible, permanent land acquisition requirements being evaluated within the 10% Layout Arrangement Partnership Share (LAPS) deduction for land consolidation and avoiding expropriation Additional consultation regarding vulnerable communities and their rights regarding loss of livelihoods

⁵ Document obtained from the local authority, confirming that the relevant crops belong to the affected person.

Entitlement Subject	Affected Persons/Communities	Type of Compensation	Additional Provisions
		<ol style="list-style-type: none"> 4. DSİ will provide suitable support in the event that the entitled PAPs apply to benefit from İŞKUR's Social Benefit Program and receive it or obtain funds from Social Aid and Solidarity Foundations. 5. DSİ guarantees to give priority to unauthorized users and/or families of vulnerable communities regarding possible temporary or permanent employment opportunities relevant to the project. 	
<p>Damages to structures, houses and products during construction</p>	<p>All other PAPs</p>	<p>Contractor of the construction will conduct necessary examination and assessment to compensate and fix damages. In cases where the damage and injuries cannot be fixed, damaged structures will be compensated as per the Land Acquisition Policy Framework.</p>	<ul style="list-style-type: none"> • PAPs will be informed of rights regarding the effects of construction phase and the grievance redress mechanism in place. • Leaving the salvaged materials after demolition of the building to the entitled, for the willing.

7.3. CALCULATION OF COMPENSATION PAYMENTS

WB ESS 5 standard requires not acquiring land before fully compensating the damages incurred by affected persons.

'Replacement cost is the method regarding the appraisal of assets within the scope of ESS 5 standard: "For agricultural land, it is the pre-project market value of land of equal productive potential or use located in the vicinity of the affected land, plus the cost of preparing the land to levels similar to those of the affected land, plus the cost of any registration and transfer taxes."

8. METHODS FOR THE APPRAISAL OF AFFECTED ASSETS

Appraisal of Value of Land

Appraisal of value of immovable goods to be expropriated are made accordingly with the capitalization of income considering the market values and using the capitalization rate to be found. In Türkiye, market value of land is determined as per the criteria stipulated in Article 11 of Law of Expropriation considering every factor affecting the value of the immovable. It is determined based on;

- a. Kind and type,
- b. Surface area,
- c. All characteristics and factors which may affect the value and the separate value of each factor,
- d. Tax return, if applicable,
- e. Appraisals performed by official authorities on expropriation date,
- f. For lands, the net income that could be derived from the immovable good or resource when used according to the location and conditions and as it is,
- g. For plots, the sale price of equivalent lands sold without any special purpose prior to the date of expropriation,
- h. For structures and buildings, official unit prices and construction cost calculation,
- i. Other objective standards which may be effective in determining the price, and with a justified assessment report.

Accordingly, 4 important criteria are used in calculating the cost of expropriation of the immovable.

A. Net return: Affected by many factors such as dryness, aqueousness, slope, product yield, product sale price.

B. Capitalization rate: It is calculated by dividing average net return of lands by actual sale prices (market values). Many factors affect the capitalization rate.

C. Market value of lands: It is the price of immovables that have developed based on supply and demand in the free market. In expropriation, land value is calculated with return method.

D. Characteristics of the land: plot/land division of immovables, location, irrigability, slope, soil structure, soil depth, risk of flooding and erosion must be determined.

Appraisal of Value of Plot

Appraisal of value for plots can be performed in 3 different ways, namely market price, transformation price and subsidiary value criteria. It is a legal obligation to appraise value according to the market price in plot appraisal for expropriation purposes.

Plot value is usually determined by directly comparing with similar plots whose actual sale prices are known. For that, actual sale price of plots similar to the plot appraised in terms of various characteristics must be known and the average m² price must be calculated with these prices.

Appraisal of Structures on Land and Plots

If there are structures on the area to be expropriated; surface area, class, age of these structures are determined first. Unit prices declared by Ministry of Environment, Urbanization and Climate Change each year, or unit price analyses for specially built structures with no unit prices are taken as basis and construction cost for expropriation is determined. From this construction cost, the depreciation determined according to the class and age of the structure stipulated in Article 23 of By-law on the Determination of the Tax Value to Serve As the Basis of Property Tax published in Official Gazette dated 02.12.1982 and enforced by the Decree of the Council of Ministers is deducted and expropriation value of the structure is obtained accordingly with

the cost criteria. In addition, absence or excess of certain elements of the structure decreases or increases the unit square meter value for structures in the same class. In fact, even the differences in quality of the material used in structures with the same characteristics change the structure value. What should be done in this case is calculating the cost of absences or excesses in the structure whose inventory is prepared and adding it to or deducting it from the value of the structure.

Compensation covering the full replacement cost will be provided for structures within LAP scope.

Salvage Price

In the event that salvage is left to the proprietor, calculated salvage price must be deducted from the total price. However, demolition and transportation cost must be calculated and paid to the proprietor.

Term Easement Price Calculation

If the duration of easement right establishment is 2-10 years, namely (n) years, and temporary: in the area where the easement is established, the decrease in net return in (n) years is accumulated to the date of easement right establishment.

If term easement is established, loss of value is not calculated as if the entire immovable has permanent easement; incurred damage is determined by considering the return or rental income deprived during the easement on that section of the immovable.

As per the Court of Cassation, two-year right of easement price is the two-year return of the section on which right of easement is established. If it is leased, the rental income; if it is planted, loss of product is declared.

Perpetual Easement Price Calculation

If the duration of easement right establishment is a long period such as 49-99 years, it is referred to as perpetual easement. The gap between land value before the establishment of easement right and land value after the establishment of easement right, namely the decrease in land value, is the price of easement right.

It can be calculated by determining 1-The loss of return due to the decrease in net return (decrease in productivity or increase in costs)

2-The change in the capitalization interest rate

3-Loss of net return.

The loss of return due to the decrease in net return:

Easement right price is determined by proportioning the difference between net return before the establishment of easement and net return after the establishment of easement to capitalization interest rate.

Decrease in productivity or change in costs is determined in view of;

- Type of immovable,
- Manner of use,
- Size,
- Location of the section with easement,
- Surface area,
- And geometric status while calculating the net return after the establishment of easement right.

While determining parcel prices for perpetual easement right, the compensation price does not exceed 35% of the value of land affected from easement. For plots, it cannot exceed 50%. This rate refers to the maximum amount determined by the Court of Cassation as per the Turkish Law. There are no changes in the ownership status of land and these restrictions are removed once the use of the land ends.

Paying substitution costs to persons who have lost their land permanently due to public services is obligatory with regards to international standards and pursuant to World Bank legislation. In Atabey Irrigation Scheme Restoration works;

- The purchase and sale fee on the title deed,
- Land registry revolving fund fee,
- Transportation costs are the items to be paid as substitution cost price for persons who have lost their land due to expropriation.
- In the land acquisitions made within the scope of Atabey irrigation, expropriation prices were determined by taking into account the principles in Turkish legislation and market conditions as much as possible. In order to cover the compensation to meet the replacement cost, the administration added the land registry purchase and sale fees, revolving fund fees and transportation costs to this price and obtained the replacement cost for the unit area. In the expropriation process, whether the compensation covers the replacement cost or not is compared with this cost and reported.

As per the Law on Land Registry in force, each person to purchase and sell (buyer- seller) title deeds must pay a 2% title deed fee over the sale price declared in the title deed. Moreover, the decided revolving fund fee must be paid for each district. Additionally, there are expenses to be made for transportation fees during the transaction.

A 2% addition must be made to the expropriation unit prices as substitution cost price in that case. Because the substitution cost price payment will be covered by expropriation cost, there will not be any additions to the price and the substitution cost to be paid to persons who have lost all or a part of their land will include the substitution cost.

Determining the Tree Cost

After determining the value of bare land covered with fruitful or fruitless trees, the price according to the age of trees is determined with a formula.

The value of trees according to their age can be calculated after finding the value of a land covered with certain t-year-old trees in examination. Thus, it is obtained by dividing the difference between the value of a fruitful and fruitless t-year-old tree by the number of trees per decare.

$$\text{Tree Value} = (D_t - D_0) / \text{Number of Trees per Decare}$$

9. INSTITUTIONAL ARRANGEMENTS

DSI will prepare a Land Acquisition Plan for every project requiring land acquisition and land consolidation. Area of impact of each project will be defined by DSI and land acquisition activities will be pursued in coordination with stakeholders both within and outside DSI.

In terms of accordance with the applicable Law and ESS 5 standard, DSI will:

- Determine project-affected persons to be directly or indirectly affected from the project including vulnerable communities such as women headed households and seasonal workers,
- Ensure that all project-affected communities and persons are informed of the requirements of land acquisition or land consolidation within the scope of the project before implementation,
- Make the four-step GRM suitable to the collection of grievances as stipulated in this LAPF and LAPs special to the project,
- Inform the relevant stakeholders including affected persons and vulnerable communities of the GRM to be created special to each project,
- Coordinate the implementations within the scope of the project before other stakeholders such as MoAF and Directorates of Land Registry,
- Prepare LAPs special to project in cases that necessitate land acquisition or resettlement,
- Ensure that the project activities does not begin before the land acquisition phase is over and compensation is paid in full,
- Monitor the activities of land consolidation or land acquisition/Resettlement special to each project and will take necessary measures or take corrective actions in case an unsuitableness is determined and
- Will warrant that the land consolidation or land acquisition and/or resettlement to be necessary for the suggested projects are in accordance with this LAPF.⁶

As per the consultations and citizen engagement approach, DSI will make sure that this LAPF and other project-specific LAPs prepared will be submitted to the World Bank for review and clearance and disclosed, locally on DSI's official website and made available at public places accessible to PAPs including vulnerable groups.

In cases where land acquisition is unavoidable, DSI will prepare a project-specific LAP or have it prepared by the consultant. DSI will state in each LAP who the affected persons are, including vulnerable groups or legal/unauthorized users of the land. Information regarding the effects of the project on the land and suggested measures for compensation of losses incurred from land acquisition will be included in LAPs. DSI will ensure that regional directorates are informed of and involved with the LAPs preparation phase and at the same time guarantee that they know what the requirements of World Bank regarding the implementation of mentioned LAPs are. Each prepared LAP will be reviewed, then accepted by World Bank before the commencement of implementation.

Increasing the capacity of Regional and Branch Directorates in a way allowing the implementation of LAPF and LAP; warranty of thorough implementation of World Bank requirements by authorized teams responsible for implementation through support, review and opinion/comments are within duties of DSI.

⁶ Within the scope of ESS 5, Involuntary Resettlement refers to the acquisition of land without approval and without considering if affected persons had to move to another location, resulting in (i) relocation or loss of shelter; (ii) loss of assets, including access to land or assets; or (iii) loss of income sources or means of livelihood. In summary, 'involuntary resettlement' within ESS 5 standard is not only about physical resettlement and includes all the aspects of land acquisition and its effects on all entities, including physical Resettlement. However, the term 'land acquisition' is used in addition to 'resettlement' in view of the purposes of this LAPF; land acquisition refers to taking of the land and resettlement refers to physical resettlement.

DSI will make effort, to the extent possible, to avoid additional land acquisition and resettlement by using existing irrigation scheme designs and utilizing public lands. Within the scope of land consolidation implementations, DSI will keep the amount of private land to be included in acquisition to a minimum in view of applicable Law and World Bank requirements presented in this LAPF.

A LAP presenting the mitigating measures to be taken to minimize or prevent the possible effects of construction works and effects of land consolidation will be prepared in land consolidation projects conducted by DSI. In case DSI finds people affected by the project during the implementation of this LAP, mitigation measures specified in this LAP will be implemented. Mitigating measures set forth in the LAP will be similar to measures in Entitlement Matrix of LAPF. Potential mitigating measures will also be shared with the World Bank with periodic monitoring reports to be prepared during the LAP implementation process. DSI will show every effort to prevent such occurrences, otherwise will aim to restore project-affected livelihoods to their state before the project or recuperate them as possible. Monitoring reports will provide update information on impacts occurred and measures taken under the said scheme.

Table 11 below provides a list of the plans to be prepared according to the land requirements of the Project under each scheme in order to comply with ESS 5 standard.

Table 11. List of Plans to be Prepared for Each Scheme

Irrigation Scheme	Plan to be Prepared	Contents of the Plan
Kayseri Ağcaşar Irrigation	Land Consolidation is planned and expropriation can be made where necessary. LAP will be prepared.	LAP⁷: Scheme-specific plans will be an improved version of LAPF and details will be explained regarding the land requirements of relevant irrigation scheme. Details of activities necessitating Land Consolidation will be included in the plan. DSI will describe the land consolidation process to be followed and legal framework to be used in implementing land consolidation activities within the scope of project. It will also include baseline information on the affected settlements and people (including vulnerable if any), possible affects and measures to overcome these anticipated affects. With the citizen engagement and consultation to be carried out, grievance redress mechanism in all stages will be described as per the Stakeholder Engagement Plan (SEP) of the Project.
Kayseri Sarımsaklı Irrigation	Land Consolidation is planned and expropriation can be made where necessary. LAP will be prepared.	
Afyonkarahisar Dinar Karakuyu Irrigation	Land Consolidation is planned and expropriation can be made where necessary. LAP will be prepared.	
Kahramanmaraş Kartalkaya Irrigation	Land Consolidation is planned and expropriation can be made where necessary. LAP will be prepared.	
	Where applicable; LAP and LAPF Closing Report will be prepared by an independent third party to analyze the results of measures taken by DSI during LAP and LAPF implementation. Depending on the LAP implementation completion dates of the schemes; DSI can chose to prepare one "LAP Closing Report" that will provide separate sub sections for each scheme's results analysis. Otherwise LAP Closing report will be prepared separately for each scheme.	LAP Closing Report: The report will take into consideration the entire LAP process and commitments of DSI to implement the LAP to analyze the results achieved. The report will flag any incompliance issues as well as providing suggestions and corrective actions to be taken to resolve the incompliances. The report will review the entire Land Consolidation process of the project and its outcomes. Results of the Land Consolidation activities, pending grievances, or any key issue or incompliance related to Land Consolidation will be addressed. The report will provide suggestions and corrective actions in case there are any unresolved grievances or incompliances to ESS 5 standard.

DSI will internally monitor all land acquisition and/or land consolidation activities carried out in all schemes through the relevant regional or provincial directorates under the supervision of the Department of Real Estate and Expropriation and the Department of Land Consolidation and OFDS and prepare and submit regular (six-monthly) monitoring reports to the World Bank. DSI may also chose to hire a consultant for the six-monthly monitoring of its LAP implementation works. Should DSI decide to appoint a contractor for the regular LAP monitoring activities of the Project, a separate contractor will be hired to prepare the Closing Reports of each scheme.

⁷ Outline of the plan with detailed description is included in Annex 1.

At the completion of all land acquisition works in relevant schemes, DSİ, through an independent third party, will prepare and share with the World Bank LAP Closing Reports for each relevant scheme (see Table 11). The closing reports for land acquisition and land consolidation implementations will both aim to provide detailed information on the processes followed for land acquisition and land consolidation as well as to compare DSİ's commitments with the results achieved. All closing reports will reveal any key issues that are in non-compliance to ESS 5 standard, pending cases where follow up and monitoring is still necessary and suggestions and corrective actions that can be followed to resolve the non-compliance, if any. The closing reports will be prepared by an independent third party (contractor or academician) at the end of implementation completion. Depending on the timing of implementation completion in each scheme, DSİ will chose to either have one LAP Closing Report including information on all schemes that have required land acquisition or have separate LAP Closing Reports for each scheme. The LAP Closing Reports will be submitted to World Bank for approval and will be disclosed both in English and Turkish on DSİ's website once approved.

All instruments (LAPF, LAP) shall be approved by the Government of the Republic of Türkiye and the World Bank, published in both English and Turkish on the World Bank website and announced locally to stakeholders and PAPs. Draft versions of the instruments shall be revised in accordance with the feedback received locally during consultations. Final versions of the instruments shall be likewise disclosed at the relevant local units of DSİ in hard copy and on the DSİ website. Amendments to be made in the instruments shall be announced in the same manner following their revision and updating.

10. CONSULTATION FRAMEWORK DISCLOSURE STRATEGY AND GRIEVANCE REDRESS MECHANISM

10.1 STAKEHOLDER ENGAGEMENT AND CONSULTATION

ESS 5 standard requires that the borrower must conduct prior consultations with project-affected persons in World Bank funded projects. Therefore, DSI will conduct and document consultation with the Water Users Associations and the local community members in the area of influence of each scheme in advance of modernization works. This consultation will provide general information about the project including the project's rationale, land requirements and impacts, legal rights of persons that may be potentially affected, and work schedules. It will be essential to inform local stakeholders of the name, contact information, and times of availability of the designated project official(s) to contact in the event of questions or problems related to land acquisition or other construction-related impacts. A stakeholder engagement plan (SEP) attached in Annex 5, illustrates the types of messages and engagement methods that will be used by DSI to target different stakeholder groups. DSI will ensure that these consultations also include any Land Consolidation-related concerns and grievances. Similarly, GRM to be established by DSI will be open for objections and grievances related to land consolidation. DSI will try and resolve and respond to such feedbacks and complaints within the framework of irrigation modernization activities to the extent possible.

DSI will commission a project unit for the project. The project responsible person to be appointed for the project will keep records of salient issues or questions raised in discussions and steps taken to facilitate their resolution. They will pro-actively explain important subjects to the persons who have joined meetings held within the scope of the project, and show effort to inform all stakeholders during the project.

DSI is setting up a "Land Consolidation Project Unit" consisting of survey and agricultural engineers within both the General Directorate and DSI Regional Directorate where the consolidation is conducted, as part of the land consolidation activities carried out. Land consolidation works are conducted by officers in project unit. Besides resolving objections and grievances received during consultation sessions for the irrigation schemes for which it performs land consolidation transactions, DSI will also prepare a Land Acquisition Plan (LAP) acceptable to the Bank before construction works related to land consolidation for irrigation modernization commence. Within the plan DSI shall illustrate the baseline conditions of lands subject to consolidation by specifying the particulars of the Land Consolidation process they will follow in order to minimize the number of modernization works-related PAPs (both legal and unauthorized land users), grievances and additional land acquisition which may result in expropriation. Similar to scheme-specific LAPs, the measures defined under this LAPF shall be taken to restore or improve livelihoods to pre-project level the livelihoods of PAPs in all necessary cases. Actions taken within the scope of LAPF will be regularly followed up on along with LAPs over the six-monthly reports. DSI will also keep a record of all objections and grievances received and resolved during consultations, through the GRM and over the six-monthly monitoring reports.

10.2 STAKEHOLDER ENGAGEMENT ACTIVITIES SO FAR

During the planning and survey phase of the project, in line with the information and data request required for the project design, promotion and information are conducted through official letters and visits, though indirectly, with all relevant public / private institutions and organizations and the interest of public / private stakeholders in the projects is kept up to date.

During the planning and survey phase of the project, requests by citizens regarding the project and its implementation are considered to the extent permitted by the project design criteria. In EIA reports prepared

within the scope of planning activities, local people are informed about the project and their opinions and suggestions regarding the project are heard before determining the scope and special format of the report. The place, date and time of the meeting are announced in local and national newspapers at least 10 days in advance and the meetings are held under the chairmanship of the Provincial Director of Environment and Urbanization or an official to be appointed.

Irrigation projects are for rehabilitation purposes and most of them are old and operating projects. In order for the project to be included in DSİ investment program, the need for rehabilitation is discussed and voted in the WUA General Assembly and decision for rehabilitation is taken. In this context, water user and beneficiaries decide for rehabilitation at Water Users Association (WUA) General Assembly after being informed by DSİ.

During land consolidation process; phases of the project, social and technical issues that may be encountered during implementation are discussed and the citizens are informed. In these meetings, detailed information regarding how the agricultural infrastructure will improve is conveyed to the proprietors. Subjects such as rationale behind the consolidation project, functioning of the project, steps of the process, benefiting from the project at the maximum level are explained to the proprietors in detail. They are also thoroughly informed of procedures (correcting spelling errors, transition etc.) they need to perform on the title deed in order to resolve grievances to emerge in the future. As per the legislation, the entitled persons are informed of the process by means of suspension notices.

10.2.1 Introduction Meeting for Pazarcık Kartalkaya Irrigation Renovation Project

An introductory meeting was held on 12.05.2022 at Kahramanmaraş WUA Meeting Hall with the participation of relevant District Mayors, Community Representatives (including women representatives), Heads of Chamber of Agriculture, District Directors of Agriculture and Forestry, Deputy Regional Directors from DSİ Regional Directorate, Provincial Branch Director, Relevant Branch Directors and farmers.

Participant list and images of the meeting in which DSİ representative gave a presentation remarking that the said irrigation project was built in 1970, approximately 20,430 hectares of land is irrigated, loss-leakage rate is at 50%, it is necessary to irrigate the area with a renovated modern irrigation system, crop pattern will change and yield will increase in the irrigation area, the approval process for the renovation projects was completed and included in the 2022 DSİ investment program and speech of Head of WUA are presented in Annex-5-1.

Requests and demands of participants in the meeting mainly focused on when the project would be implemented, and whether irrigation services would be hindered in irrigation season. As a response, the authorities stated that irrigation would commence as soon as possible, along with irrigation, closed pressurized irrigation system would be used, and works would be planned in a way not hindering the existing irrigation during the season and thus the project would provide economic benefits to the local people.

10.2.2 Information Meeting for Section I of Afyonkarahisar Dinar Karakuyu Pumped Irrigation

An informative meeting was held in Dinar District Governorship Meeting Hall on 26.04.2022 with the participation of Project Management Team of DSİ 18th Regional Directorate, Chief of Dinar Chamber of Agriculture, District Director of Agriculture, muhtars of the villages within the project area and farmers.

After the Deputy Director of the 18th Regional Directorate of DSİ provided information about the areas covered by the project, the stages related to the implementation of the project and the construction process, the questions of the participants were received and answered by the project team. Frequently asked questions were about;

- Water is collected and used in areas close to the water source, so the irrigation zone should be shifted and Akgün village should be included in the project area,
- Including the areas outside the Irrigation Zone within the irrigation area,
- Whether it is possible to develop different methods to minimize energy costs,
- DSİ assuming the operation at the end of the project,
- What kind of work will be done regarding the pasture parcels within the project area,
- Transfer of irrigation cooperatives to WUAs,
- How expropriation and consolidation will be carried out in the project area.

The questions were answered in detail by the project management team. All of the participants expressed their contentment about water savings and the increase in irrigation rates to be obtained by switching to a closed system. In addition, a request was made to switch to the closed system as soon as possible for the remaining parts except for Section I. The list of participants and images of the meeting are presented in Annex-5-2.

10.2.3 Public Participation Meeting for Sarımsaklı Dam Irrigation Renovation Project

An informative meeting was held on 31.05.2022 at Gömeç Muhtar's Office with 47 participants including DSİ officials, Head of Kocasinan Chamber of Agriculture, Head of Sarımsaklı Irrigation Union, neighborhood muhtars and farmers.

The meeting was announced to the public two days priorly through the relevant Chambers of Agriculture, WUA and Muhtars in the project villages. Booklets (50 pieces in A4 size) were distributed to the citizens during the program (Annex-5-4).

Deputy Regional Director of DSİ 12th Region provided information about the land acquisition to be carried out in the neighborhoods within the project scope and the consolidation and expropriation processes. In his speech, he summarized that the purpose of the project is to convert Sarımsaklı Irrigation, which was put into service in 1968, into a modern drip - sprinkler irrigation system. Land acquisition will be carried out through consolidation and expropriation in the neighborhoods in the project area based on requirements and technical possibilities.

Afterwards, a speech was delivered by the Head of Kocasinan Chamber of Agriculture. In his speech, he summarized that he has been following the Sarımsaklı Dam Irrigation Renovation Project for 7-8 years, that Sarımsaklı Plain is one of the most fertile plains in Türkiye, and that a modern irrigation system will be introduced to eliminate the problems of insufficient irrigation.

In the meeting, information was also provided on the latest status of the villages where Land Consolidation Project has been and will be carried out.

After the speeches, the Q&A session started and the questions of the farmers were answered in detail by DSI officials.

The list of participants and images of the meeting are presented in Annex-5-3.

10.3 GRIEVANCE REDRESS MECHANISM

In order to record and resolve the positive/negative feedback, or complaints communicated by project-affected people or other stakeholders during project implementation, DSI will create an easily accessible GRM. The GRM will aim to address all problems and complaints concerning land acquisition/consolidation processes and/or other environmental and social issues during construction stage.

DSI presently has a four-stage GRM:

1. Water Users Association / Contractor
2. DSI Branch Directorates
3. DSI Regional Directorates
4. General Directorate of DSI

Accordingly, affected persons or stakeholders will thus be enabled to convey their objections and grievances to any one of said institutions/organizations via e-mail/telephone or through direct application to national grievance notification mechanisms such as CIMER (Presidency Communications Center). All grievances received are recorded to Document Registry Branch under DSI General Directorate Staffing Department. Received grievances are resolved by document registry officers conveying them to the relevant divisions based on their type and contents, and being examined within the specified response time. Written applications or all grievances conveyed through CIMER are recorded by DSI. In cases where grievances conveyed through telephone must be solved by DSI, the aggrieved party is directed to convey their objection and/or grievance through GRM.

Document registry officers stationed in all units prepare monthly reports regarding grievances conveyed through both DSI GRM and CIMER.

Grievances received through Water Users Association usually concerns issues encountered during implementation phase, on the other hand, grievances received through other units may concern all work and transactions conducted by DSI. Water Users Association records grievances they receive when necessary and when requested, to share with DSI.

DSI will maintain operating its current GRM with minor adjustments to allow for project-level data collection. Any grievance during the implementation of project schemes will be communicated to the closest DSI unit (WUA, Project Directorate, DSI Branch Directorate, Regional Directorate or General Directorate) in person, by electronic mail or other available means. All of the objections will be recorded and objecting parties will be responded to in writing. After objections to plot plans are evaluated, the objecting parties will be informed that the procedures done will be suspended again so that they can be viewed.

If issues arise concerning land acquisition or consolidation, the PAPs will be informed by DSI officials about the legal process and rights, as part of the communication strategy, prior to the expropriation/land consolidation and construction processes.

All types of grievances and requests lodged by project-affected people or other stakeholders will be recorded by DSI for each project. The records will be evaluated and closed, and the closed grievances will be documented and saved. The GRM will be operated in compliance with the World Bank's policy requirements.

Any complaint received by DSI will be responded to within 15 days. In case it takes longer than 15 days to resolve the grievance, the griever will be informed and efforts will be made to conclude the issue within one month by higher-level authorities.

Written petitions may be received by e-mail or through application in person. Two separate grievance forms will be used for the GRM. The first form will be the "Grievance Form". When a grievance is first received, a copy of the completed Grievance Form will be submitted to the griever if requested. After the corrective action and address of the grievance, a Grievance Closeout Form will be completed by the officer in charge of grievances. A sample Grievance Form is given in Annex 2.

DSI, through its engagement activities, will ensure that all project affected individuals, groups and communities are informed of the existing GRM and introduced to project officers at site to whom they may convey their grievances they may have regarding the implementation of the project.

11. MONITORING AND EVALUATION

11.1 MONITORING LEVELS

The main objective of implementing this LAPF and scheme specific LAPs is to improve or at least mitigate adverse social effects and restore losses of livelihood of the PAPs at their pre-project level. The purpose of LAP monitoring will be to verify that:

- Actions and commitments described in the LAPF and LAPs are implemented fully and on time,
- Eligible affected people receive their entitled compensation in full within agreed time frames,
- Objections and grievances lodged by PAPs are followed up and that where necessary, appropriate corrective actions are implemented.

Monitoring and follow-up of land acquisition and land consolidation processes will be carried out in regularly through six-monthly monitoring and follow-up activities. The implementation and monitoring of land acquisition and land consolidation activities will be the responsibility of DSI's staff in Regional Directorates, who will report to the Regional Social and Environmental Coordinator. The Regional Social and Environmental Coordinator (in each Regional Directorate) will prepare and monitor the implementation of LAPs, ensure continuous engagement with construction contractors, beneficiaries and other stakeholders in affected communities, and coordinate the redress of grievances. The Regional Social and Environmental Coordinators will submit six-monthly reports including the progress of LAP to the Social and Environment Lead in the Project Management Team at DSI Headquarters.

Monitoring activities will be carried out under the supervision of DSI's Real Estate and Expropriation Department and Department of Land Consolidation and OFDS through active monitoring provided by the relevant regional directorate task teams. Both land acquisition and land consolidation works carried out by DSI will be followed up by regular site visits and reports prepared by task teams of the project on site. DSI may choose to commission a consultant for the implementation and monitoring of LAP.

DSI will monitor the processes of land acquisition and land consolidation, and inform the World Bank of progress made on the implementation and any non-compliance encountered through six-monthly monitoring reports. A sample monitoring report is provided in Annex 4.

In addition, the World Bank will, as noted above, in its regular supervision missions also monitor the processes and if needed recommend mitigation measures to resolve any outstanding issues.

After the completion of AEP implementation, DSI will commission an independent consultant to assess the implementation of land acquisition and land consolidation works, and this consultant will be different from monitoring and follow-up consultant. This consultant will:

- Analyze the accordance of LAP implementations with LAPF and project-specific LAPs,
- Report timely and solution-based steps taken by fulfilling the requirements stipulated in LAPs, concerning the issues encountered,
- Analyze if vulnerable communities and unauthorized land users are neglected,

- Analyze feedback and grievances of the community regarding the loss of land and land-based livelihoods.
- Assess the consultation strategy in force and its effects on local communities and PAPs,
- Assess the measures taken by DSI in the scope of both land acquisition and land consolidation and the suitability of compensation strategy, to guarantee that the project has no negative effects on the land.

The independent consultant will prepare a LAP Closing Report to be submitted for the approval of World Bank. These final Closing Reports will be disclosed in both English and Turkish on DSI website.

DSI is also planning to conduct an independent study apart from the ones requested by World Bank to assess the effects of land consolidation and irrigation circularity and productivity works within the scope of each project on farmers and local communities. This study will be carried out in the 5th or 6th year of the project, when the modernized irrigation schemes have been in operation for at least 1 year.

11.2 MONITORING INDICATORS

Some suggested performance criteria regarding the monitoring of land acquisition implementation processes are presented in Table 14.

Table 14: Land Acquisition Implementation Process Monitoring Indicators

	Source of Information	Reporting Frequency
Total number of plots subject to acquisition (per project) <ul style="list-style-type: none"> • Public Lands • Privately Owned Lands • Purchase with consent • Judicially 	Expropriation records	Every six months
Total of affected persons compensated (per project) <ul style="list-style-type: none"> • Land owners • Land users • M/F • Vulnerable groups 	Expropriation records and compensation payment records	Every six months
Number of court hearings where the provisions of Article 10 are enforced <ul style="list-style-type: none"> • Open • Closed (registered) 	Expropriation records	Every six months
Compensation payments made (per project) <ul style="list-style-type: none"> • Land owners • Land users (owner/unauthorized) • Vulnerable groups 	Compensation payment records	Every six months
Number of plots subject to land consolidation (per project) <ul style="list-style-type: none"> • DSİ 	Land consolidation records	Every six months
Number of affected persons objecting land consolidation (per project) <ul style="list-style-type: none"> • DSİ 	Land consolidation records	Every six months
Consultations (per project) <ul style="list-style-type: none"> • Land acquisition • Land consolidation 	Regional/Provincial Directorate records	Every six months
Number of affected persons briefed (in each province) <ul style="list-style-type: none"> • M • F 	Regional/Provincial Directorate records	Every six months
Number of grievances filed concerning land acquisition and consolidation (per project) <ul style="list-style-type: none"> • Open • Closed • Complainant F/M • Subject • Closed in due time 	DSİ grievance records	Every six months

12. IMPLEMENTATION PROCEDURE, BUDGET AND TIMEFRAME

For each specified irrigation scheme, requirements for land acquisition and land consolidation will be confirmed following the completion of project design for every scheme. Approximative costs regarding land acquisition and land consolidation are presented in Table 15. As stated before, DSI will try avoid land acquisition through land consolidation to the extent possible. However, both land consolidation and land acquisition may be necessary in some projects. Budget provision presented in the table may change depending on the final scheme. The costs of land consolidation and land acquisition will be financed by DSI's own budget.

Table 15 Land Acquisition Budget Estimate

Irrigation Scheme	Expropriation	Consolidation	TOTAL
	Cost (TRY)	Cost (TRY)	Cost (TRY)
Pazarcık	5,315,250	26,500,000	31,815,250
Sarımsaklı	29,058,750	27,720,564	56,779,314
Karakuyu	1,208,800	4,400,000	5,608,800
Total in TRY	35,582,800	72,120,564	107,703,364

Costs presented in Table 15 cover the costs of expropriation and land consolidation. Converted into USD this cost is around 5,780,000USD. The costs for hiring a third-party consultant to prepare LAPs and conduct monitoring for the three irrigation schemes is expected to be 745,000USD. Informing outside of consultations within the scope of LAP to be prepared for sub-projects, on-site visits and consultation meetings will be conducted under DSI's overall budget.

ANNEXES

ANNEX 1 LAND ACQUISITION PLAN / LAND CONSOLIDATION REPORTING FORMAT

1. INTRODUCTION

- *Location of the project (province, district, neighborhood)*
- *Size and type (private/public) of land required for the project etc.*
- *Presence of unauthorized users on the land*
- *Reasons for the selection of this land*
- *Information regarding other assets (if any) on land and their current status (utilization status etc.)*
- *Information regarding land acquisition process to be followed*
- *Size and type (private/public) of land to be consolidated within the scope of project, whether there are unauthorized users on the land etc.*
- *Any loss of livelihoods expected*
- *Project description: Describing irrigation establishment and land consolidation activities based on the status and stage of the project*
- *Information on approach to be followed for land consolidation in the project*

2. POTENTIAL AFFECTS OF EXPROPRIATION AND AFFECTED PERSONS

- *Definition of project impacts (temporary/permanent)*
- *Method to be used in land acquisition (depending on belonging to public or person; establishment of permanent ownership right, establishment of easement, renting, designation, transfer permit etc.)*
- *In the event that the ownership of chosen land belongs to persons, information regarding the number of legal right owners and how they use the land*
- *If there are structures on the chosen land, information on who the people using these structures are, how and for how long they were affected from the project*
- *If there is a non-agricultural use of chosen land (lodging, agricultural industry etc.), information on who the affected persons are, how and for how long they were affected from the project*
- *Whether there were effects on livelihoods of affected persons depending on the land use status*
- *Are there vulnerable communities within PAPs?*
- *Suitable criteria to be complied to for compensation as per the national legislation and ESS 5*

3. POTENTIAL AFFECTS OF LAND CONSOLIDATION AND AFFECTED PERSONS

- *Definition of any impacts related to consolidation and irrigation modernization (temporary, permanent)*
- *Description of the settlements subject to Land Consolidation and profile of the PAPs and local community*
- *Information on the land use (are there landowners, or tenants, how many registered water users, how many non-registered water users, number of women subject to land consolidation etc.)*
- *Perceptions of local community towards Land Consolidation*
- *Existence of vulnerable groups among project-affected people -Definition of their categories -Impacts on these certain groups, if any.*

4. BASELINE

Presentation of methodology and findings from surveys undertaken to inform baseline for persons affected by land acquisition and/or land consolidation. The surveys will be undertaken in line with WB requirements.

5. LEGAL FRAMEWORK

(Legal framework described within Land Acquisition Policy Framework can be the same as expropriation and land consolidation. Legal framework may be shorter or longer due to varying land requirements of sub-projects.)

- *Brief information on the national legislation (only the laws/regulations applicable to the project)*
- *Summary of the Bank Policies and ESS 5, and gap filling measures for differences*

6. IMPLEMENTATION, COMPENSATION AND OTHER ASSISTANCE

Summary of land acquisition process; legal responsibilities of DSI, how and in what period the land will be acquired, who will be compensated and for what kind of immovables, information on other assistance/support to be provided during the project implementation process (whether there will be additional measures for restoration of livelihoods if they are affected)

Summary of land consolidation process; legal responsibilities of DSI, how and in what period will Land Consolidation be carried out, mitigation measures for the impacts anticipated caused by Land Consolidation, information on other assistance/support to be provided during the project implementation process (whether there will be additional measures for income restoration if livelihoods are affected)

7. CONSULTATION AND ENGAGEMENT

Summary of consultations with the owners and users of the land subject to land acquisition or land consolidation, who the responsible persons for the consultation are, channels and tools to be used to inform project-affected persons, how vulnerable communities, if there are any, will be engaged in consultation process. For land consolidation processes, describe if there are owners who do not agree with the process.

8. GRIEVANCE/REQUEST SYSTEM

How the grievance/request system to be established within the scope of the project will work and in which stages of the project, who the responsible parties will be, tools and methods to be employed

9. MONITORING AND REPORTING

How and how frequently the monitoring of LAP to be implemented will be carried out, how and how frequently the monitoring activity will be reported

10. TIMETABLE AND BUDGET

Envisioned estimated budget and work plan for land acquisition works

ANNEX2 GRIEVANCE APPLICATION FORM / CLOSURE FORM

GRIEVANCE APPLICATION FORM			
Name of the Receiver of Grievance:		Date:	
Title:			
GRIEVER'S		METHOD OF RECEIVING GRIEVANCE	
Name/Surname		Tel	<input type="checkbox"/>
Telephone		Information Meeting	<input type="checkbox"/>
Address		Application to Field Office	<input type="checkbox"/>
Village		Mail/E-mail	<input type="checkbox"/>
Signature (if applicable)		On-Site Visit	<input type="checkbox"/>
		Other:	<input type="checkbox"/>
DETAILS OF GRIEVANCE			

GRIEVANCE CLOSING FORM			
ASSESSMENT OF GRIEVANCE		Expropriation	<input type="checkbox"/>
		Damage to housing or livelihoods	<input type="checkbox"/>
		Environmental or social	<input type="checkbox"/>
		Labor force related	<input type="checkbox"/>
		Other	<input type="checkbox"/>
Does It Require Compensation?	<input type="checkbox"/> YES	<input type="checkbox"/> NO	
CONCLUSION			
CLOSING			
<i>This section will be filled out by the griever and grievance assessment committee after the compensation is paid and grievance is resolved. (Bank receipt showing the compensation is paid or other documents can be attached instead of griever's signature)</i>			
Institution authority		Aggrieved Party	
Name-Surname		Name-Surname	
Date and Signature		Date and Signature (if possible)	

Annex 3. Six-Monthly Monitoring Report - Proposed Framework

The cover of the report will include date of preparation and the reporting period.

1. Sub-project Description

A brief overview of the sub-project will be included in this section. This overview will include: linked activities needed for the functionality or success of the sub-project, main components, variations in design (if any) which may change land access requirements must be stated in the reports to be prepared.

2. Implementation Summary

The summary of all tasks and activities undertaken up to date on land acquisition and/or resettlement will be provided in this section. Progress on issues such as negotiations for land, court cases, compensation payments, public engagement, site selection, physical resettlement, livelihood restoration, land consolidation (if any) and grievances should be explained.

3. Emerging Issues and Recommendations

This section will describe the key issues and report on its state of resolution/non-resolution.

4. Follow-up on Previous Recommendations

Due to this section not existing in the first report, it will not have any follow up requirements from a previous period. In the second report, issues set forth in this section in the previous report and the significance of redress will be stated. Any unresolved issue will once again be pointed out in this section.

5. Conclusion

General progress of LAP implementation will be evaluated and future actions in line with the recommendations will be discussed in this section.

6. LAP Implementation - Summary Tables

*In line with the monitoring indicators set out in the LAP, this section will provide through several tables, both period specific and overall information on LAP implementation. The tables can be presented separately in an Excel worksheet or directly under this section depending on the content of information presented. **(In the event that the tables are presented in an Excel sheet, they can be used as templates in other sub-projects.)***

Annex 4 Stakeholder Engagement Plan

No.	Subject of Engagement	Details of Engagement	Targeted Stakeholders	Method of Engagement	Frequency (recommended)
1	Irrigation Modernization Project (Design, implementation, investment program, etc.)	<p>Information sharing regarding the Project will increase by means of meetings (to be held in WUAs, affected settlements etc.).</p> <p>Target stakeholder groups do not have sufficient knowledge about technical project design, tender process, construction stages, expected outcomes. DSI will inform the target stakeholder groups regularly in regard to the briefing by DSI Regional Directorate Operation and Maintenance Department on how the engagement meetings will be held.</p> <p>DSI will liaise between the contractor and WUA for communication and implementation of the closed irrigation system project.</p>	Water Users Association (President, Board of Directors, Council, etc.)	Information Disclosure Meetings	Quarterly
			Members of WUA	Coordination Meetings	Annually
			Non-Members of WUA		Annually
			Governors' Office	Brochures and Posters	Every six months
			District Governorate		Every six months
			Municipality	Sharing reports of the Project	Annually
			Provincial and District Directorates of Agriculture		Every six months
			Chamber of Agriculture	Press Bulletins	Annually
			Hydroelectric Power Plants	DSI Website	Annually
			Water User Associations		Annually
			Muhtars (local authority)		Annually
			Company conducting closed irrigation system project works		Quarterly
Agricultural Workers	Information and coordination meetings	As necessary			
2	Capacity building (budgeting,	DSI is currently working on developing a standard database for WUAs. It is highly important	WUA Association Organizational Structure (President,	Meetings	Every six months

No.	Subject of Engagement	Details of Engagement	Targeted Stakeholders	Method of Engagement	Frequency (recommended)
	reporting, training, key elements of the LAPF etc.)	<p>that this database includes gender aspects and women water users' data. This database will facilitate monitoring water users (both member and non-member) of WUA. DSI will organize annual trainings on database maintenance and reporting for WUA Management. Trainings will take place in DSI Regional Directorate.</p> <p>In these annual trainings, WUAs will be informed about how to fill out legally mandatory paperwork such as Board and Council Decision record books, incoming document registration record book, water user registration documents, general ledger, cash blotter, plant ledger, accounting logs, annual budget plans, etc.. Trainings will take place in DSI Regional Directorate.</p> <p>Knowledge will be increased by informing the relevant personnel on WUA legislation.</p> <p>Construction company will train the WUA technical personnel regarding the use of the system after the implementation of the</p>	<p>Board of Directors, Council, etc.)</p> <p>WUA personnel</p> <p>Company conducting closed irrigation system project works</p>	<p>Site Visits</p> <p>Training Booklets</p>	<p>Within the contract period between DSI and company</p> <p>Within the contract period between DSI and company</p>

No.	Subject of Engagement	Details of Engagement	Targeted Stakeholders	Method of Engagement	Frequency (recommended)
		<p>project is completed. WUA management and WUA members/users will join the training to be given upon completion of construction. The training program will include both theory and practice. A classroom training will be given on how the system works, printed materials such as brochures will be used as user guides. On the job trainings will be given on sites of WUAs to be determined and system utilization will be demonstrated. Additional training on how to use more technical systems such as SCADA will be provided for WUA managements.</p>			
3	Grievance Redress Mechanism	<p>Developing a Formal Grievance Redress Mechanism and Recording System for WUAs and informing WUAs about it. The grievance redress mechanism and notification channels should be available for all members and non-members with project-related requests and concerns.</p> <p>WUAs and members will be informed of a cellphone</p>	<p>WUA Association Organizational Structure (President, Board of Directors, Council, etc.) WUA personnel Members of WUA Non-Members of WUA Water User Associations Muhtars (local authority)</p>	<p>Meetings Brochures and Posters DSi Website Reports Press Bulletins</p>	During the project

No.	Subject of Engagement	Details of Engagement	Targeted Stakeholders	Method of Engagement	Frequency (recommended)
		application named Flood, Failure and Intervention Spatial Information System (TAMBIS), in case a flood/inundation occurs. The application will be introduced to water users and WUA personnel.	Company conducting closed irrigation system project works	Grievance Forms	Construction and operation periods
4	Land Acquisition (land consolidation, expropriation)	Relevant stakeholders including persons affected by land acquisition will be periodically informed about the land consolidation and expropriation works conducted by DSI. The official grievances related to land consolidation will be received by the directorate responsible for implementation. The WUA and aggrieved parties should be informed on the progress of resolution of the grievances.	WUA Association Organizational Structure (President, Board of Directors, Council, etc.)	Information Disclosure Meetings	Every six months
			Project affected WUA members	Coordination Meetings	Annually
			Project affected non-members of WUA	Legal documents (notifications, new plot plans, etc.)	Annually
					Annually
			Provincial and District Directorates of Agriculture	DSI Website	Annually
			Muhtars (local authority)		Every six months
			Company will carry out land consolidation works		(During land consolidation process) quarterly
5	Monitoring and evaluation	WUA performance follow-up Monitoring and follow-up of WUA members and non-members	WUA Association Organizational Structure (President, Board of Directors, Council, etc.)	Meetings	Annually
			Members of WUA	Reports	
				Site Visits	Annually

No.	Subject of Engagement	Details of Engagement	Targeted Stakeholders	Method of Engagement	Frequency (recommended)
		Grievance follow-up Project related grievances and stakeholder engagement process will be monitored and followed up.	Non-Members of WUA	Performance indicators Monitoring and Evaluation forms	Annually
6	Financial and Technical Audit	WUAs will be audited in financial and technical aspects and the results will be share with the governor's offices.	WUA Association Organizational Structure (President, Board of Directors, Council, etc.)	Meetings Reports Site Visits	Annually
			Governors' Office		Annually
			District Governorate		Annually
7	Irrigation tariff (determining the water usage fees)	Information about tariffs	WUA Association Organizational Structure (President, Board of Directors, Council, etc.)	Meetings DSi Website	Annually
8	Current and Planned Irrigation Sources	Information the WUA about current and planned irrigation sources and water amounts	WUA Association Organizational Structure (President, Board of Directors, Council, etc.)	Meetings Reports	Twice a year
			Municipality		Twice a year
			Provincial and District Directorates of Agriculture		Twice a year
			Hydroelectric Power Plants		Twice a year
9	Suggested Crop Pattern	Information about crop patterns for basin-based irrigation	WUA Association Organizational Structure (President,	Meetings	If needed

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		agriculture If needed, Provincial and District Directorates of Agriculture will conduct agricultural trainings for the stakeholders.	Board of Directors, Council, etc.) Members of WUA Non-Members of WUA Provincial and District Directorates of Agriculture	Brochures and Posters	 If needed If needed If needed
10	Irrigation Methods and Techniques (Spring system, drip irrigation etc.)	Information about irrigation systems which will increase the productivity level depending on the crop pattern for irrigated agriculture. If needed, Provincial and District Directorates of Agriculture will conduct agricultural trainings for the stakeholders.	WUA Association Organizational Structure (President, Board of Directors, Council, etc.)	Meetings Brochures and Posters	As necessary
			Members of WUA	DSi Website	As necessary
			Non-Members of WUA	Site Visits	As necessary
			Provincial and District Directorates of Agriculture		As necessary
			Chamber of Agriculture		As necessary
			Muhtars (local authority)		As necessary
11	Female Water Users	Increasing knowledge on the project by organizing meetings DSI will organize information sharing meetings on characteristic of the new irrigation system, alternative cultivation methods and capacity building and increasing for participation in WUAs. Gender equality will be regarded and these meetings will be held prior to irrigation season. (As there	Female members of Water User Associations	Information Disclosure Meetings	Quarterly
			Female council members of Water User Associations	Brochures and Posters	As necessary As necessary
			Female members of the Water User Association	DSi Website	Quarterly
				Site Visits	Annually

No.	Subject of Engagement	Details of Engagement	Targeted Stakeholders	Method of Engagement	Frequency (recommended)
		will have to be an election between women to be included in trainings, location of trainings will be chosen regarding the needs of women. Timing of training has to be outside agriculture season when women are not working in the fields.)	Female water users who are not members of Water User Associations	Monitoring and evaluation Reports Grievance Forms	Annually Construction and operation periods