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RP1530

**TURKISH ELECTRICITY TRANSMISSION COMPANY
TEIAS**

RENEWABLE ENERGY INTEGRATION PROJECT

Resettlement Policy Framework

**DRAFT
12/10/2013**

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1. Objective of the Resettlement Policy Framework

The objective of transmission infrastructure is to ensure economical and uninterrupted transmission of electricity generated at generation facilities. This objective is achieved by increasing the capacities of old transmission lines and substations and by constructing new transmission facilities.

When specifying the routes of new electricity transmission lines and the locations of new substations, Turkish Electricity Transmission Company (TEIAS) avoids settlement areas to the extent possible and expropriation is kept to a minimum level by not involving houses and other buildings, within the framework of the technical requirements. Necessary care is employed to protect forests, historical and environmental protection sites, etc, following national policies and well-established practices.

The procedures presented in this Resettlement Policy Framework (RPF) detail actions, which will be taken to ensure the compliance with Turkish Legislation and Procedures (Turkish Legislation listed below) and the World Bank Policies and Procedures as specified in the World Bank Operational Policy OP/BP 4.12 on Involuntary Resettlement.

The exact locations of the proposed list of investments for the project are not known at this time. As a result, this RPF in accordance with World Bank's Operational Policy OP 4.12 has been prepared. The currently ongoing project implemented by TEIAS with a World Bank loan, *Energy Community of Southeast Europe Adaptable Program Loan 6 (APL6)*, contained similar investments. A RPF was prepared by TEIAS for this project, consulted on, disclosed and cleared by the World Bank in June 2010. This RPF is a revised version of the APL 6 RPF dated June 2010. For each sub-project TEIAS will prepare a RAP or ARAP (depending on the magnitude of impacts) that will need to be reviewed and cleared by the WB, and disclosed. It is anticipated that there will be three power substation subprojects under Component A and one submarine cable subproject under Component B that will require involuntary land acquisition.

2. Project Description

The components of the Renewable Energy Integration project are expected to partially alleviate the key barriers that inhibit faster development of wind energy in Turkey. The components for which land acquisition and resettlement may be required are summarized below:

a) Development of transmission infrastructure to facilitate faster development of Wind Power Plants (WPPs)

This component includes the development of three 380kV 500 MVA highly digitalized wind power grid connection structures in the provinces of Can, Izmir and Hamitabat consisting of: (i) high voltage (HV) wind power substations; (ii) HV grid interfacing equipment; (iii) commercial smart-metering systems; (iv) feeders (underground cables) to evacuate power from the site; (v) tele-metered dispatch systems; (vi) digital protection systems; (vii) supervisory systems; and (viii) automatic voltage control systems.

b) Lapseki-Sutluce 380 kV Submarine Power Cable to better inter-connect wind energy locations with other parts of Turkey

Just as the first phase of this undersea project under the ongoing Adaptable Program Loan (APL6) project, the cable under this component will go under the Dardanelles strait. The second cable will be located in the same area as the first cable, parallel to the first cable at a close distance. The cable is expected to be one single length 3.8 km long. This is a crucial project for connecting the Asian and the European sides of Turkey. Its relevance to renewable energy lies with the transmission of bulk electricity including renewable generated power from the Anatolia side to the high-growth Istanbul area and beyond towards the European ENTSO-E networks.

c) Strengthening of Transmission Networks to cater to growing demand and supply of electricity in Turkey

The component adds two open air 380/154 kV substations to help reduce transmission losses and voltage drops in the provinces of Antalya and Urgup and will increase system capacity to cope with the rapidly rising demand. In addition, it will add six 154/33 kV (GIS) located in the provinces of Atasehir, Hadimkoy, Selcuk, Yakuplyu, Muratpasa, and Sultanbeyli. The component also contains five 154/33kV underground cable projects to be built as part of a loop to serve increased load growth and to boost system reliability. The cables will connect the following substations: Yeni Ambarli – Yenibosna with a length of 14 km; Karabaglar – Buca with a length of 8.7 km; Kucukbakkalkoy – Kadikoy with a length of 8.5 km; Yakuplu – Ambarli with a length of 5 km; and Umraniye – Dudullu with a length of 9 km.

3. Potential Impacts of the Project and Affected Persons

Persons affected by the project are the owners, renters or users of immovable properties corresponding to the routes of electricity transmission lines, locations of the substations and locations where the submarine power cable will be connected to land. The location of project sites take into account land use and try to minimize impacts on persons. Affected persons are identified during the preparation of implementation and expropriation plans for each investment project. They are located in the three regions where the substations will be built (Can, Izmir, Hamitabat/Vize), and at the locations where the submarine power cable will be connected to land (Lapseki and Sutluce). For Component C summarized above, currently no land acquisition is foreseen as the substations will not be built on privately owned land and the underground cables are expected to follow existing roads. Nevertheless, it is included in the Resettlement Policy Framework unforeseen circumstances require land acquisition.

Impacts of the proposed substations and transmission lines are not expected to be significant: Small sizes of land will be expropriated for the substations and transmission line poles, and long term easements will not limit use of land significantly for transmission lines. These lands are used primarily for agriculture and grazing. In addition, most lands in these areas have large numbers of owners and heirs, who do not live on the land or in the near vicinity. When owners do not live on the land, reasonable efforts are made to reach them by: 1) Local inquiries for current address research from villagers and muhtar, 2) Inquiry of last known residence from land registry and cadastre records, and law enforcement records through their national identification number, and 3) official advertisement in newspaper. If the owners can still not be reached, the compensation for the land is deposited in their

name to a Bank account and remains in the Bank account for 10 years. The owner can withdraw the compensation at any point in time.

The land lost due to the electricity transmission lines, which often follow a narrow strip of land, is limited to the footprints of the transmission towers and poles. During and subsequent to construction, agricultural activities are maintained underneath the lines. In addition, the sites needed for substations tend to be small.

Physical relocation of households is not expected, nor is impacts on structures. Expropriation by TEIAS will not involve the displacement or resettlement of households. Expropriation only affects the very small tower areas (approximately 150 – 250 m²) and small tracts for substations. The land between towers is not expropriated. Rather, long term easement agreements are executed with owners to provide under-ground easements, which permit existing agricultural activities to be carried out without interruption. Land owners can continue cultivating the land, but are restricted from any action damaging electricity poles, constructing structures under the transmission lines, and planting trees above a certain height (varies with technical specification of transmission line) under the transmission lines. Moreover, owners will be paid replacement compensation to purchase land of equivalent value. Therefore, the owner, as the effected person, is not aggrieved. Alternative lands for purchase exist in the surrounding areas, if farmers whose lands are expropriated want to continue farming. For grazers, villagers will be able to continue animal grazing as there is enough alternate land.

Apart from land acquisition/expropriation, there may be some damages to fruit trees, on the grazing lands of animal grazers and other villagers stemming from transportation of large materials for relevant facilities by large trucks during construction phase. In such cases, damages have to be compensated.

Before the acquisition of land, local TEIAS land acquisition staff meet with affected persons to discuss land acquisition process, rights and responsibilities and compensation. During these meetings TEIAS staff will ask additional questions as necessary to be included in the RAP and to assess the vulnerability of affected persons. If land owners' lands are not viable due to partial land acquisition, the entire plot may be expropriated as a response. For vulnerable affected people, options and suggestions will be discussed to ensure that people are not negatively affected by the project and can continue with their lives at a level that is at least as good as pre-project levels.

Entitlement Matrix in Annex 1 lists the major categories of potential impacts on affected people under the project.

Eligibility Criteria

As explained above and detailed in the entitlement matrix the categories of eligible affected persons are:

- Owners of involuntarily acquired land
- Renters on acquired land
- Grazers and other Users of acquired lands or public lands

- Owners on whose land there will be long term easements

Once the decision for expropriation is made, affected persons will be identified through land registry and cadastre records, and site visit and survey of affected persons. Affected persons will be notified of land acquisition to take place. This will also be the cut-off date for determining eligibility.

4. Turkish Legal Framework for Land Acquisition

Laws and Procedures for Land Acquisition

In the scope of Turkish legal framework, land acquisition/expropriation is based on the Expropriation Law No: 2942 (amended by Law No: 4650 in 2001. In addition, Article 46 of the Turkish Constitution explains that state and legal public entities, in cases of public benefit, are entitled to entirely or partially expropriate immovable properties in private possession, on condition that the real value of those immovable properties are paid in advance and in cash; and to establish easement rights on these immovable properties in compliance with the procedures and principles set by expropriation law. In other words; Constitution implies that any immovable property cannot be confiscated unless its expropriation compensation is paid to the owner/s in advance and in cash.

One or several of the following legislation also govern land acquisition by TEIAS:

1. Electricity Market Law No. 4628,
2. Civil Code No. 4721,
3. Decree in the Power of Law No. 233 regarding State Economic Enterprises,
4. Articles of Association of TEIAS published on 29.06.2001,
5. Reconstruction Law, Land Survey Law, Forest Law, Pastures Law, Organized Industrial Zones Law,
6. Environment Law, Agricultural Reform Law, and other applicable legislation.

In all cases where the owners of immovable properties can be identified, the first choice practice is to purchase the land by direct negotiation. For those owners with whom agreement cannot be reached by negotiation or for owners with unidentified addresses, or for immovable properties over which there are ownership disputes; a lawsuit is filed with the relevant court for valuation and registration, pursuant to Article 10 of the Expropriation Law, and the expropriation fee set by the court in the course of the lawsuit is deposited with a bank account to be paid to the owner of the expropriated property. The expropriation fee for immovable properties with no known owner is deposited into a time account with 3-month maturity terms. (A minimum two months is required for notification and negotiations before invoking of the Expropriation Law. The actual time increases in proportion with the number of owners and acres.) Thus, the owners or beneficiaries of immovable properties do not suffer from the loss of any of their rights.

Expropriation fees are set pursuant to the criteria set out in Article 11 of the Expropriation Law. Turkish legislation does not require the payment of compensation to tenants and unofficial users of properties who have made no improvements. However, persons who have spent money and constructed/erected buildings or other structures on the lands of other persons are compensated at full replacement cost. They are also compensated for standing crops and economic trees they planted on the land they use unofficially.

The right to complain of owners who are affected by the expropriation process is reserved under national legislation both in the administrative and judicial sense. The effected owner's right to complain covers both the right to administratively claim the project to be rendered in another place and in the pecuniary sense, the right to reject the price that will be paid to him. If the affected owner does not achieve what he/she requests from the TEIAS regarding the price or the change of place, he/she has the right to file a case both in the administrative courts and the general courts of justice.

The damages that occur on the route or on the way to the route are paid to the affected persons following the necessary due diligence. These compensations also cover the reinstatement of the real estate to its prior condition.

Implementation steps of the expropriation process are explained in the following paragraphs.

Expropriation procedures are commenced with the decision taken by the Executive Board of TEIAS, within the framework of the technical and economic documents prepared.

Methods for Valuation of Assets

A valuation committee consisting of a minimum number of persons appointed by TEIAS appraises the value of the immovable property to be expropriated, having regard to the information and documents to be obtained from expert persons, institutions and authorities, the Ministry of Industry and Trade where necessary, and from local real estate agencies as per Article 8 of the Expropriation Law.

The valuation commission determines the estimated ceiling value of immovable properties in the expropriation area. During the valuation of immovable assets or resources, valuation commission has to take into account the following valuation criteria, which is mentioned in Article 11 of the Expropriation Law:

- a) The nature of the immovable property or resource
- b) The size of the immovable property or resource
- c) All the characteristics and elements, which could affect the value of the immovable property or resource, including the individual value of each element
- d) Taxes paid on that immovable property or resource, if any
- e) Previous values of property determined by official bodies at the date of expropriation

- f) For lands, the net income that could be derived from the immovable asset or resource (without undertaking any changes, using the immovable property or resource in the same conditions as of the expropriation date)
- g) For house plots, the amount for which equal (similar) house plots have been sold without any special purpose, prior to the date of expropriation
- h) For structures, official unit prices (issued by the Ministry of Environment and Urbanization) at the expropriation date, calculations of the cost of building, and depreciation for wear and tear
- i) Any other objective criteria that could affect the value of the property or resource

Announcement:

TEIAS notifies the owners of the immovable property to be expropriated through an official registered letter indicating its desire to purchase the subject land through negotiation, and paying the price of the land or usufruct right for such land in cash. For immovable properties over which there is ownership dispute, relevant courts publish the summary of expropriation documents in a local and national newspaper at least once. (The time given before the call for negotiations is related to the number of owners and acres.)

Purchasing Upon Agreement / Payment of Fee / Registration:

A negotiation committee consisting of three people appointed by TEIAS (Expropriation Law-Article 8) negotiates with the owners responding to the notification for agreement and prepares minutes as a result of the negotiations. In cases where agreement is reached, the expropriation is registered at the land office and the expropriation fee is paid. (Expropriation Law-Article 8).

Negotiation commission is internally established by the agency responsible for land acquisition to negotiate with property owners. Each negotiation commission is comprised of at least three persons. Prior to negotiation stage, the commission sends an official invitation letter to property owner without informing about the estimated value for the asset that had been previously estimated by the valuation commission. Then, negotiation session starts on determined date.

If agreement on expropriation value is reached, the property ownership transfer (alienation) and payment of expropriation compensation procedures are completed within 45 days. The property owner does not hold a right of objection after this negotiated settlement process.

Non-agreement:

If an agreement is not reached during negotiations, the agency responsible for land acquisition applies to the Civil Court of First Instance with needed documents. The court assigns a day for a trial within 30 days following this application and calls the parties (agency and property owner) for conciliation on a value on the trial day. If the parties cannot reach an agreement upon a value, the judge assigns a date for land survey by a commission, which consists of independent experts, within 15 days, and a new trial date within 30 days. The evaluation process of the immovable property is undertaken by this

independent expert commission with the participation of all parties plus the village headman. Following the field visit regarding land survey, the expert commission submits its report to the court within 15 days. The report explicitly states the determined value for the property. Then, the court sends this report to both parties. If the parties cannot agree on this value at the trial again, the judge can assign a new expert commission to finalize the same procedure within 15 days and determines the expropriation value at the next trial day. The expropriation fee is then deposited at a specified bank account in the name of the owner of the land in line with the court judgment issued and a copy of the receipt of such payment is submitted to the court. Any registration judgment issued is final.

It should be noted that the costs of the court process are born by the responsible agency according to the Expropriation Law.

The Court takes the final decision about the compensation of immovable property in question while the owner still has the right to appeal to the “Supreme Court” about the valuation, but not for the expropriation of the land. Finally, the property ownership transfer and payment of expropriation compensation are completed within 15 days in line with the decision of the court.

In addition, if a land is partially expropriated and in case of the remaining part is not usable, this part can also be expropriated upon the request of the owner within 30 days following receiving expropriation decision (article 12 of Expropriation Law).

During the implementation of these procedures, TEIAS ensures that:

These procedures are in compliance with TEIAS legislation;

The property and inheritance rights of persons, even when in contradiction with public benefit, are respected and protected;

The process is transparent and open to the public;

The expropriation price is determined fairly and paid in cash and up front;

The land is not entered into before expropriation is complete and the necessary payment is made in accordance with the Turkish National legislation;

Persons not satisfied with the expropriation price can object to the amount of expropriation fee and are free to appeal to the court;

All of the procedures during this process are formally documented.

Urgent Expropriation

Article 27 of the Expropriation Law authorizes the organization responsible for expropriation to confiscate the properties required by the project earlier than the time needed in normal expropriation procedure. This process does not prevent challenges of the property owners against the determined valuation. The valuation process is performed by the court and the valuation experts assigned by the court within one week.

Mainly, for the expropriation of needed immovable properties Article 27 of the Law prescribes that in cases of the necessity for national defence as for the implementation of the Law on Obligations for

Natural Defence (No: 3634) or in cases of the urgency of land expropriation decided by the Cabinet (projects of concern in this report fall under this category) or in cases of emergency, which are stipulated in special laws, any immovable asset can be confiscated by the organization responsible for expropriation. In this case, the sequence of operations (excluding evaluation of immovable properties) is completed later. Through the court (upon request of the responsible organization), the values of the immovable assets are evaluated by an expert commission according to the provisions of Article 10 and 15 of the Law within seven days. The confiscation can be carried out after the determined compensation is deposited in the bank (in the name of the owner) indicated in the invitation letter and an announcement in line with the Article 10 of the Expropriation Law, by the responsible organization.

5. World Bank OP 4.12 and Gap Analysis

Objectives and Required Measures under OP 4.12

The World Bank OP 4.12 on Involuntary Resettlement includes safeguards to address and mitigate risks resulting from involuntary resettlement under development projects, and covers any involuntary land taking.¹

The overall objectives of the Bank's policy on involuntary resettlement are the following:

- (a) Involuntary resettlement should be avoided where feasible, or minimized, exploring all viable alternative project designs.
- (b) Where it is not feasible to avoid resettlement, resettlement activities should be conceived and executed as sustainable development programs, providing sufficient investment resources to enable the persons displaced by the project to share in project benefits. Displaced persons should be meaningfully consulted and should have opportunities to participate in planning and implementing resettlement programs.
- (c) Displaced persons should be assisted in their efforts to improve their livelihoods and standards of living or at least to restore them, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher.

To address the impacts covered under involuntary settlements of this policy, the policy requires the implementing agency, TEIAS, to prepare a resettlement plan or a resettlement policy framework that covers the following:

- (a) The resettlement plan or resettlement policy framework includes measures to ensure that the displaced persons are
 - (i) informed about their options and rights pertaining to resettlement;

¹ The full text of the policy and guidance on implementation can be accessed at:
<http://go.worldbank.org/ZDIJXP7TQ0>

(ii) consulted on, offered choices among, and provided with technically and economically feasible resettlement alternatives; and

(iii) provided prompt and effective compensation at full replacement cost for losses of assets attributable directly to the project.

(b) If the impacts include physical relocation, the resettlement plan or resettlement policy framework includes measures to ensure that the displaced persons are

(i) provided assistance (such as moving allowances) during relocation; and

(ii) provided with residential housing, or housing sites, or, as required, agricultural sites for which a combination of productive potential, locational advantages, and other factors is at least equivalent to the advantages of the old site, compensation for their losses at full replacement cost and assistance in improving their former living standards, income earning capacity and production levels or at least restoring them.

OP (WB operational policy) 4.12 requires that no land shall be acquired before compensation is paid in full to the affected people.

Moreover, OP 4.12 requires the Project to create and implement a resettlement plan, the preparation of which involves the involuntary resettles and hosts in planning. In this regard, OP 4.12 requires the Project to systematically inform and consult affected persons about their options and rights during the preparation of the resettlement plan.

“Replacement cost” is the method of valuing assets endorsed by OP 4.12: “For agricultural land, it is the pre-project or pre-displacement, whichever is higher, 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.”

OP 4.12 also recognizes that some types of loss, such as access to public services, customers and suppliers, grazing or forest areas, cannot easily be compensated for in monetary terms and, therefore, requires the Project to attempt to make or establish access to equivalent and acceptable resources and earning opportunities.

While OP 4.12 covers all affected people, it calls on the Project to pay particular attention to the needs of the poorest groups to be resettled and specifically states that the absence of legal title to land should not bar compensation to the population adversely affected by the Project, indigenous groups, ethnic minorities and pastoralists who may have usufruct or customary rights to the land or resources taken for the project. Additionally, OP 4.12 provides that the LAP must include land allocation or culturally acceptable alternative income-earning strategies to protect the livelihood of vulnerable groups, such as indigenous people, the landless, and semi-landless and households headed by females who, though displace, may not be protected through national land compensation legislation.

Gap analysis

National regulation and processes regarding land acquisition have a long lasting history in Turkey. They have been updated in the years of implementation to improve the process solve the problems encountered and to incorporate some requirements from international good practice. However, there are still some issues creating gaps between Turkish requirements and World Bank OP 4.12 In this regard main gaps can be summarized under the following issues:

- Public information disclosure, consultation and participation
- Compensation/assistance to renters, sharecroppers and other users of lands, who does not own property
- Compensation payment to users of pastures
- Replacement value/cost evaluation for immovable properties to be expropriated
- Preparation of resettlement action plans and scope of resettlement
- Monitoring
- Grievance Redress Mechanism

Public Information Disclosure, Consultation and Participation

There are no adequate provisions regarding information disclosure to public, public consultation and participation in the Turkish legislation regarding land acquisition. In case urgent expropriation is applied, this gap becomes larger due to absence of any public information activity. In the scope of normal expropriation procedure, an invitation letter is sent to property owners for the aim of informing and inviting rightful owner to negotiations within 15 days. Therefore rightful owner becomes aware of land acquisition. Nevertheless, there are several types of announcements and official surveys for applications of affected persons to resettlement, identification and entitlement of affected persons, and implementation plans.

Overall, as good practice, local TEIAS land acquisition staff arrange a number of informative and consultative meetings with affected families in the villages. Under this project, consultation meeting will be arranged before land acquisition procedures begin with affected persons, with TEIAS local expropriation staff also joining the consultation meetings for the Environmental Management Plans.

Compensation/Assistance for PAPs who do not own Property

There is no legal provision regarding land acquisition about compensating renters, sharecroppers and other users of the land for the crops on the land, who are not owners.

For renters who use the properties to be acquired for farming, compensation for crops will be paid if not harvested prior to the land acquisition. In addition, in the preparation and implementation of Resettlement Actions Plans TEIAS can ensure that renters are able to find alternate properties to rent in the area. The Resettlement Action Plan will include an assessment of lands in the vicinity noting

whether comparable alternate lands are available for renters, and other measures as necessary. Compensation provided will ensure that the livelihoods of renters are not affected.

Compensation Payment to Users of Pastures

Affected persons, who were benefiting from the use of public properties (e.g., persons who keep livestock on public pastures or harvest/collect medical aromatic plants in forest areas), are not directly compensated for expropriation.

Compensations of government pastures are paid to government (to the Ministry of Food, Agriculture and Livestock) as grass prices for 20 years and other legal payments in line with the legislative provisions. Thus, PAPs using these areas are not compensated.

For the project areas concerned however, TEIAS can ensure during Resettlement Action Plan preparation and implementation that alternative areas for grazing exist in the near vicinity for grazers to use.

Replacement Value Evaluation for Immovable Properties to be Expropriated

Under Turkish law, valuation is calculated at market price by experts and using local real estate data, though in implementation some steps are taken to reach the replacement value. In valuation for lands, a combination of productive potential, advantages due to location, and such factors regarding the land subject to expropriation are taken into account by the evaluation commission. Tax exemption is applied during title deed transfer of taken land.

TEIAS will provide sufficient compensation to affected persons to enable them to purchase new land of equivalent value.

Preparation of Resettlement Action Plans and Scope of Resettlement

There is no national legal provision about preparation of land acquisition and resettlement action plans, which would include all affected persons. In contrary, the World Bank policy requires all persons to be physically or economically displaced to be considered in the scope of resettlement.

To bridge this gap, TEIAS will prepare a resettlement action plan in line with the scope and level of detail required by OP 4.12.

Monitoring

There are no provisions for monitoring in Turkish legal framework regarding land acquisition and resettlement.

Although monitoring is not part of the Turkish legal requirements, a project specific monitoring and evaluation program in line with World Bank policies will be established. The overall progress reports

explaining the progression of the project implementation sent to the World Bank by TEIAS will also include reporting on the progress of land acquisition.

Grievance Redress Mechanism

Although TEIAS has an informal system in place to collect and meet all complaints of affected persons, there is no provision for establishing a systematic grievance redress mechanism under Turkish law.

A project specific grievance redress mechanism will be developed by TEIAS for the Resettlement Action Plans, consisting of accessible and documented grievance redress handling at the muhtar, construction site, local TEIAS land acquisition office and main TEIAS office in Ankara.

6. Procedures for Implementation

The land acquisition process for project investments will be executed by TEIAS) General Directorate under the authorization of the Ministry of Energy and Natural Resources (MENR). The expropriation procedures are commenced with the decision taken by the Executive Board of TEIAS. Expropriation is financed from the operating budget in the respective activity year and the appraised fees are paid to relevant persons in line with the agreement reached or the court judgment issued.

Process for Preparing and Approving Resettlement Plans

Under the World Bank funded Renewable Energy Integration Project, TEIAS will be responsible for preparing Resettlement Action Plans (RAPs) for the land acquisition aspects. For each substation project, TEIAS will submit a RAP to the Bank for approval before implementation of land acquisition and commencement of the construction work. RAPs will include detailed provision for the planning and implementation of resettlement, meeting the goals of OP 4.12. The scope and level of detail of the RAP varies with the magnitude and complexity of the land acquisition and compensation issues. The plan will indicate the number and ownerships of parcels to be acquired or subject to servitude agreements, the amount of each parcel affected, estimated cost of the land and other assets to be acquired or subject to the long term easement, responsibility for execution and schedule for acquisition. The RAP will be disclosed locally, and all compensation will be paid before land is acquired.

TEIAS has the responsibility to ensure that project implementation plan is fully consistent with the RAP and also to provide for adequate monitoring and reporting of the activities set out in the RAP. As part of RAP implementation, TEIAS will provide a summary report of land acquisition activities to the World Bank every six months, to be included in the overall project progress report, indicating the number and ownership of parcels affected and their current status, the progress of negotiations and appeals, and the price offered and finally paid (reported as number of square meters of the original whole plot and the size of the specific area acquired, and amount per square meter). At the end of the project and as part of project completion report, TEIAS will provide the Bank with completion audit.

The World Bank will review and confirm documentation on the land acquisition process to ensure conformance with OP/BP 4.12. Confirmation process will include World Bank assessing the documentation and compensation process. If necessary, the World Bank may contact interested/affected parties to confirm the validity and determine whether or not the process and outcomes comply with OP/BP 4.12. The World Bank will regularly supervise RAP implementation to determine compliance with OP 4.12.

The finalized RAPs will be disclosed at local project sites, on TEIAS website and in World Bank's Infoshop.

Arrangement for Funding Resettlement

Based on the authority from the Turkish Ministry of energy and Natural Resources all project related land acquisition costs will be managed under the TEIAS Expropriation unit. Once TEIAS Board of Directors approves a subproject and the connected land acquisition needs, the costs for the land acquisition activities are included in the annual budget for that fiscal year. The budget is then managed and disbursed in accordance with the findings of the land valuation committee.

7. Grievance Redress Mechanism

A project specific grievance redress mechanism will be developed by TEIAS for the Resettlement Action Plans, consisting of accessible and documented grievance redress handling at the muhtar, construction site, local TEIAS land acquisition office, and main TEIAS office in Ankara. Grievances and responses will be documented.

8. Consultation and Participation

A key step in World Bank policies on resettlement, land acquisition and compensation is a framework for public consultation, participation, and the establishment of a process to redress the grievances of affected people. Consultation with the affected population and with officials of local government, civil society and other representatives of the affected population is essential for gaining a comprehensive understanding of the types and degrees of adverse effects.

Overall, as good practice, local TEIAS land acquisition staff arrange a number of informative and consultative meetings with affected families in the villages. Under this project, consultation meeting will be arranged in parallel to the Environmental Action Plan consultation meetings and before land acquisition procedures begin with affected persons. TEIAS will disclose the draft RAPs before this meeting for affected persons to view and discuss. TEIAS will respond to affected persons questions in the consultation meetings. Consultation meetings, attendants and issues raised will be documented.

The finalized RAPs will be disclosed at local project sites, on TEIAS website and in World Bank's Infoshop.

9. Monitoring Implementation & Reporting

The purpose of resettlement monitoring will be to verify that:

- Actions and commitments described in the RAP are implemented fully and on time
- Eligible affected people receive their full compensation entitlements within agreed timeframes
- Complaints and grievances lodged by project affected people are followed up and that where necessary, appropriate corrective actions are implemented
- If necessary, changes in RAP procedure are made to improve delivery of entitlements to project affected people

Primary monitoring responsibility will rest with TEIAS. TEIAS has the responsibility to ensure that project implementation plan is fully consistent with the RAP and also to provide for adequate monitoring and reporting of the activities set out in the RAP. TEIAS will provide a summary report of land acquisition activities to the World Bank every six months, as part of the overall progress report for the project. At the completion of the project, TEIAS will also provide a completion report.

Annex 1: Entitlement Matrix

Project Component	Element	Project Impact	Category of Affected Person	Entitlement	Additional Provisions
Sub-stations and Submarine Cable Connection Points	Site of sub-station / connection point	Land Acquisition (all)	Owner	Sufficient compensation for owner to buy land of equivalent value; Compensation for unharvested crops	Ensure that there is comparable land in area (land valuation commission determining compensation works by surveying and assessing comparable land in the area)
		Land Acquisition (partial)	Owner	Sufficient compensation for owner to buy land of equivalent value; Compensation for unharvested crops	If remaining part not usable and land owner petitions, expropriation of whole plot
		Land Acquisition	Renter	Compensation for	Ensure that

				unharvested crops	there is comparable land for rent in area
Transmission Lines	Tower	Land Acquisition (partial)	Owner	Sufficient compensation for owner to buy land of equivalent value; Compensation for unharvested crops; compensation for damages to crops, trees	Land returned to prior condition
	Transmission Cable	Long term Easement	Owner	Compensation for unharvested crops; compensation for damages to crops, trees	Land returned to prior condition
Substations	Substations	Loss of grazing land	User		Ensure that there is alternative land for rent in area

These categories and actions, including estimated costs, are to be used in preparing RAPs for each sub-project that requires the acquisition of land or servitude agreements.