



*This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliđi, Trkiye Cumhuriyeti ve Dnya Bankası tarafından ortaklařa finanse edilmektedir*

SUSTAINABLE CITIES PROJECT-II

Additional Financing

Derebucak Wastewater Treatment Plant Project

Ex-Post Social Audit (EPSA)



TUMAS - ENCON JOINT
VENTURE



SEPTEMBER 2023



This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliđi, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklađa finanse edilmektedir

REVISION HISTORY

Ver.	Date of Issue	Issue Reason	Client	Project Owner	Consultant
1	June 2023	First Submission	ILBANK	Konya Metropolitan Municipality (KOSKI)	TUMAS & ENCON Joint Venture
2	July 2023	Assystem comments addressed	ILBANK	Konya Metropolitan Municipality (KOSKI)	TUMAS & ENCON Joint Venture
3	July 2023	Assystem comments addressed	ILBANK	Konya Metropolitan Municipality (KOSKI)	TUMAS & ENCON Joint Venture
4	July 2023	Assystem comments addressed	ILBANK	Konya Metropolitan Municipality (KOSKI)	TUMAS & ENCON Joint Venture
5	August 2023	WB comments addressed	ILBANK	Konya Metropolitan Municipality (KOSKI)	TUMAS & ENCON Joint Venture
6	September 2023	Assystem comments addressed	ILBANK	Konya Metropolitan Municipality (KOSKI)	TUMAS & ENCON Joint Venture



This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliđi, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklađa finanse edilmektedir

TABLE OF CONTENTS

REVISION HISTORY	i
LIST OF TABLES	2
LIST OF FIGURES	2
LIST OF ABBREVIATIONS	3
GLOSSARY	4
EXECUTIVE SUMMARY	5
1. INTRODUCTION	6
2. INFORMATION ABOUT THE PROJECT	9
3. ENTITLEMENT MATRIX	11
4. INVENTORY OF LAND & ASSETS ACQUIRED FROM PRIVATE OWNERS	12
4.1 Inventory of Land & Assets Acquired from Private Owners (Expropriation).....	12
5. CONSULTATIONS, COMMUNICATIONS & MANAGEMENT OF GRIEVANCES AND IMPLEMENTATION ISSUES	12
6. CONCLUSION & REMEDIAL MEASURES	20



This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliđi, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklađa finanse edilmektedir

LIST OF TABLES

Table 2.1 Expropriation Status of parcels	10
Table 3.1 Entitlement Matrix.....	11

LIST OF FIGURES

Figure 1.1 Site Location Map for the Project Area	7
Figure 1.2 Location of Parcel No. 159/25 of which owners or users are interviewed	8
Figure 1.3 Parcel No: 159/25.....	8



This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliđi, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklađa finanse edilmektedir

LIST OF ABBREVIATIONS

EM	Entitlement Matrix
ENCON	ENCON Cevre Danismanlik Ltd. Sti.
EPSA	Ex-Post Social Audit
FI	Financial Intermediary
ILBANK	ILBANK A.S.
KOSKI	Konya Metropolitan Municipality
LA	Land Acquisition
LARPF	Land Acquisition and Involuntary Resettlement Policy Framework
OPs	Operational Policies
PAP	Project Affected Person
SCP-II-AF	Sustainable Cities Project-II - Additional Financing
TKGM	General Directorate of Land Registry Cadastre
The Project	Derebucak Wastewater Treatment Plant Project
TUMAS	Turk Muhendislik Musavirlik ve Muteahhitlik A.S.
WB	The World Bank
WWTP	Wastewater Treatment Plant



This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliđi, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklađa finanse edilmektedir

GLOSSARY¹

Compensation: Payment in cash or in kind for an asset or a resource that is acquired or affected Derebucak Wastewater Treatment Plant Project at the time the asset needs to be replaced.

Easement²: A legal right to use of land of another, without the right to possession of that land, or to take any part of the soil or produce of such land.

Household³: A household is considered as being a set of (related or unrelated) people habitually sharing the same dwelling (whether it is their main residence or not) and who have a joint budget.

Landowner: The term landowner is used for people who hold legal land titles/title deeds.

Physical Displacement: Loss of residential property resulting from the acquisition of land associated with the Derebucak Wastewater Treatment Plant Project that requires a person to move to another location.

Project Affected Persons - PAPs: A PAP is any person who, as a result of the implementation of the Project, loses (or restricted in) the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, pasture or undeveloped/unused land), annual or perennial crops and trees, or any other fixed or moveable asset, any other livelihood resources, either in full or in part, permanently or temporarily.

Settlement: The term settlement refers to all villages, towns and their neighborhoods or quarters.

Stakeholders: Any and all individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.

Vulnerable/Disadvantaged individuals/groups: People who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by the project/ by displacement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits. Vulnerability is considered with regard to the Project context.

¹ Key definitions and abbreviation of terms used in the Ex-Post Social Audit report are presented (Note: Some of the definitions are taken from the IFC Handbook for Preparing a Resettlement Action Plan, 2002)

² Land Acquisition and Resettlement Framework, Enhancing the Climate Resilience of the West Coast Road Project, March 2015

³ <https://www.insee.fr/en/metadonnees/definition/c1106>



This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliđi, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklađa finanse edilmektedir

EXECUTIVE SUMMARY

Derebucak Wastewater Treatment Plant Project (“the Project”) is one of the sub-projects covered under the Sustainable Cities Project-II - Additional Financing (SCP-II-AF) to support sustainable development in Turkish cities. The Project aims to solve environmental pollution caused by lack of wastewater treatment and to improve public health in the Derebucak District. The Project will be financed by the World Bank (WB). The Project Management Unit (PMU) of ILBANK, as Borrower of the loan, will be serving as a Financial Intermediary (FI) to Konya Water and Sewerage Administration (KOSKI). KOSKI will be responsible for the implementation of the Project at the local level.

This Ex-Post Social Audit has been prepared by TUMAS Turk Muhendislik Musavirlik ve Muteahhitlik A.S. (TUMAS) & ENCON Cevre Danismanlik Ltd. Sti. (ENCON) Joint Venture for KOSKI, who is the Project Owner of Derebucak Wastewater Treatment Plant Project.

The Project will be implemented in Derebucak District of Konya Province located in Central Anatolia region of Türkiye. In the current situation, the untreated wastewater discharging into the Kocadere River puts considerable pressure on the environment and public health. With this regard, the Project aims to remove this pressure through construction of a wastewater treatment plant (WWTP) that has a capacity of 400 m³/day with a target year of 2055 and the expected population to be served is 2,570. The area allocated for the WWTP is located at Parcel No. 159/25 of Sarayonu Neighborhood of Derebucak District.

The expected results from the Project are listed below:

- The Project will enable KOSKI to provide proper wastewater treatment in Derebucak District and thereby reduce risk to public health, environment, and natural sources;
- The Project will provide contribution for Türkiye to comply with national and international quality standards in the wastewater sector; and
- The health standards of the public will be improved through the implementation.

According to the repealed Environmental Impact Assessment (EIA) Regulation (Official Gazette dated July 29, 2022, and numbered 31907), Derebucak Wastewater Treatment Plant Project has been evaluated as out of scope and “EIA Exemption Letter” was issued by Provincial Directorate of Environment, Urbanization and Climate Change (provided in Appendix-1 of Stakeholder Engagement Plan (SEP) of this Project). This “EIA Exemption” certificate should still be valid according to the latest EIA Regulation (Official Gazette dated 29.07.2022 and numbered 31907) as the capacity of WWTP is still under the threshold value (50,000 m³/day) in Annex-I of latest EIA Regulation.

On the other hand, considering the location of the Project and the nature of its potential environmental and social impacts, the Project would be categorized as Category B Project for which an ESMP is required under WB screening criteria and OP 4.01.

The construction of WWTP does not require expropriation of any private land since the area currently belongs to KOSKI and expropriation was completed in August 21, 2017 by KOSKI. The land was acquired in anticipation of the project. The need for an Ex-Post Social Audit (EPSA) arises since the land acquisition process related to Derebucak Wastewater Treatment Project was completed in advance of the project, in 2017. This EPSA is formulated in order to assess the scale of impact on the Project Affected Persons (PAPs) and to check if proper process were followed and due and fair compensations had been issued to them according to the provisions, objectives and principles of both national legislation and WB requirements as per World Bank (WB) Operational Policy (OP) 4.12 and the Land Acquisition and Resettlement Policy Framework (LARPF) of the SCP-II. The WWTP site was previously used for strawberry cultivation, however, the area is currently in idle status and there is no land use for any purpose and no outstanding claim, informal users, squatters are of concern on the land.



This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliđi, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklađa finanse edilmektedir

1. INTRODUCTION

This Ex-Post Social Audit (EPSA) Report has been prepared by TUMAS Turk Muhendislik Musavirlik ve Muteahhitlik A.S. (TUMAS) & ENCON Cevre Danismanlik Ltd. Sti. (ENCON) Joint Venture for Konya Metropolitan Municipality (KOSKI), who is the Project Owner of Derebucak Wastewater Treatment Project, which is being implemented under the World Bank (WB) Sustainable Cities Project-II Additional Financing (SCP-II-AF).

Derebucak Wastewater Treatment Project (“the Project”) is one of the sub-projects covered under the Sustainable Cities Project-II Additional Financing (SCP-II AF) to support sustainable development in Turkish cities. The formulation of the SCP-II AF was part of an ongoing technical assistance for sustainable urban development and capital investment planning being provided under Component A (Municipal Investments) of SCP-I. This outstanding demand includes identification of investments to improve public transport, water and sanitation, solid waste management, energy, environment, disaster risk management and climate resilience, and social infrastructure. This project will be constructed in Derebucak District in Konya Province and aims to better respond to the need for wastewater services within the scope of the Project. Konya Province and site location map of the project area is given in Figure 1.1.

The need for an Ex-Post Social Audit (EPSA) arises since the land acquisition process related to Derebucak Wastewater Treatment Project was completed in advance of the project, in 2017. This EPSA is formulated in order to assess the scale of impact on the Project Affected Person (PAP) and to check if proper process were followed and due and fair compensations had been issued to them according to the provisions, objectives and principles of both national legislation and WB requirements as per World Bank (WB) Operational Policy (OP) 4.12 and the Land Acquisition and Resettlement Policy Framework (LARPF) of the SCP-II. The process, compensation and outcomes of the Land Acquisition (LA) will be subject to review in this process, which means that supporting documents, procedures and the interviews with all PAPs are required, including an assessment of the PAPs' livelihood situation post-LA.

The valuation process of the expropriation entails that the appraisers first visit the expropriation area and determine all the factors that may affect the value of the relevant real estate in accordance with the provisions of Article 11 of the Expropriation Law (Official Gazette dated November 08, 1983 and numbered 18215) taking into account the current use situation: soil class, land use, topography, climate, settlements and proximity to roads, suitable transportation conditions, location, crop pattern grown alternately in the region, whether irrigated and dry farming activities are carried out.

Within the scope of the land acquisition process of this project, private lands were subject to land take, and negotiation were conducted with these landowners. In the preparation of this EPSA, fieldwork was conducted to meet with the PAPs on the 30th of May, 2023. During the fieldwork, an Ex-post Social Audit interview was conducted with landowners of the affected parcel. The land affected by expropriation and undergoing the Ex-Post Social Audit is the Parcel No. 159/25 that is located in the Derebucak District (see Figure 1.2 and Figure 1.3). The expropriated land, Parcel No. 159/25, has 12 landowners. Detailed information about landowners is provided in Table 2.1.



This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu proje Avrupa Birliği, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklaşa finanse edilmektedir

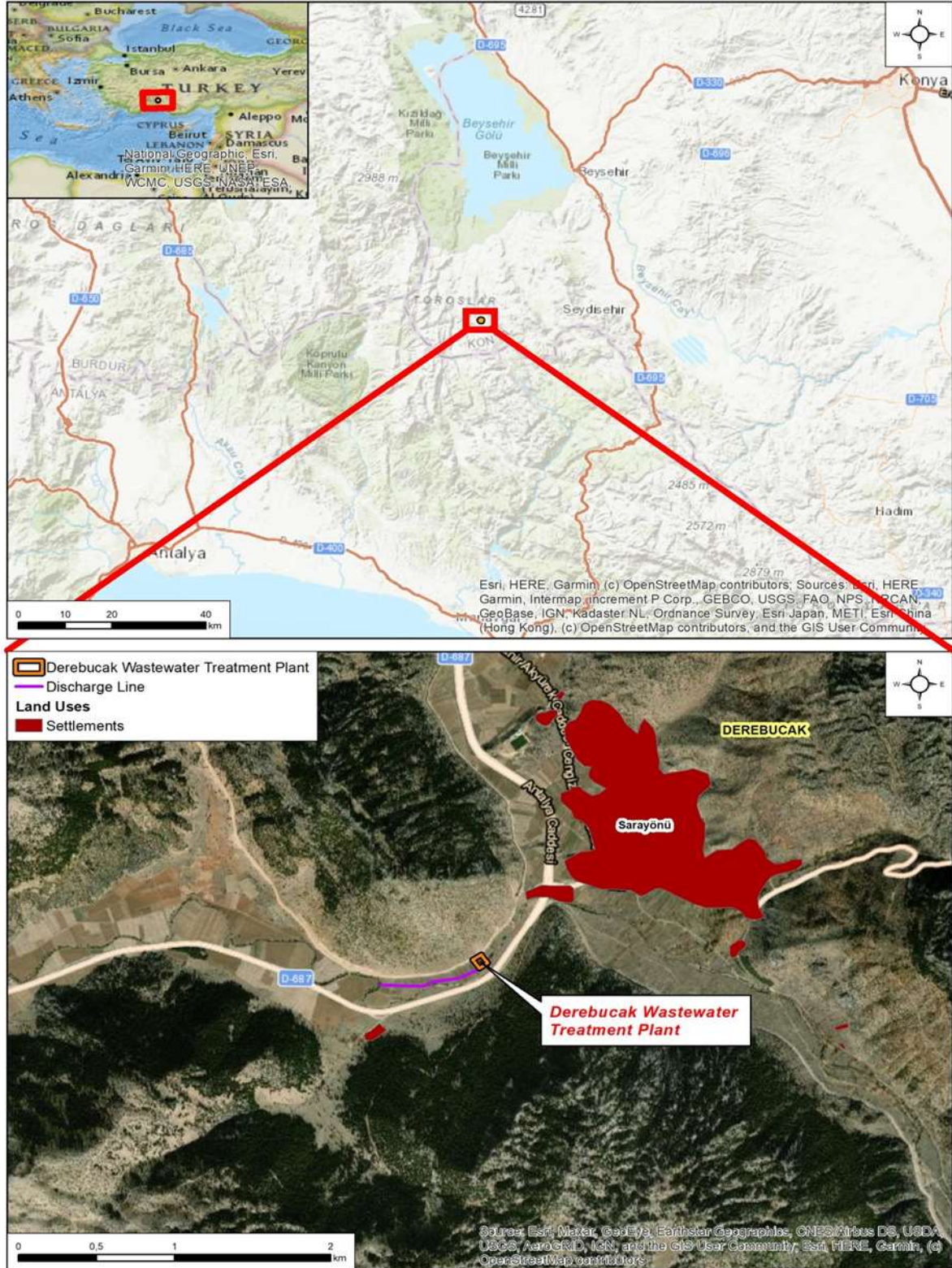


Figure 1.1 Site Location Map for the Project Area



This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliđi, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklađa finanse edilmektedir



Source: <https://parselsorgu.tkgm.gov.tr/>

Figure 1.2 Location of Parcel No. 159/25 of which owners or users are interviewed



Figure 1.3 Parcel No: 159/25

The information gathered during the interviews held with the owners and/or users of the land with Parcel No. 159/25 is used in the preparation of this EPSA Report, with the permission of the landowners.



This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliđi, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklađa finanse edilmektedir

2. INFORMATION ABOUT THE PROJECT	
Name & Location of Project	Konya (Derebucak) Wastewater Treatment Plant Project Konya Province / Derebucak District / Sarayonu, Musalla, Yeni and Kenankuyu
Key Dates of Implementation	Completed date of expropriations process: 21.08.2017
Project Components & Land Requirements	In the current situation, the untreated wastewater discharge into the Kocadere River puts considerable pressure on the environment and public health. The Project aims to remove this pressure through construction of an advanced wastewater treatment plant (WWTP) with an additional final disinfection that has a capacity of 400 m ³ /day with a target year of 2055 and the expected population to be served is 2,570.
Land acquisition method	Konya (Derebucak) Wastewater Treatment Plant Project is located in Konya Province Derebucak District, Sarayonu, Musalla, Kenankuyu and Yeni Neighborhoods. The Parcel No. 159/25 was acquired by expropriation within the framework of the above date.



This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliği, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklaşa finanse edilmektedir

Table 2.1 Expropriation Status of parcels

Parcel No.	Ownership	Type of Impact	Land Acquisition Method	Status of Implementation	Compensation Paid	PAP's Share of the Parcel	Dates Delivered
159/25	Mustafa Yilmaz	Permanent loss of land	Expropriation	CLOSED - Expropriated with compensation payment at replacement cost with negotiated settlement	35,000.66 Turkish Liras	(1/4) 1148.6925 m ²	21.08.2017
159/25	Ahmet Yilmaz	Permanent loss of land	Expropriation	CLOSED - Expropriated with compensation payment at replacement cost with negotiated settlement	35,000.66 Turkish Liras	(1/4) 1148.6925 m ²	21.08.2017
159/25	Emine Kurtcu	Permanent loss of land	Expropriation	CLOSED - Expropriated with compensation payment at replacement cost with negotiated settlement	35,000.66 Turkish Liras	(1/4) 1148.6925 m ²	21.08.2017
159/25	Ahmet Ince	Permanent loss of land	Expropriation	CLOSED - Expropriated with compensation payment at replacement cost with negotiated settlement	5,000.09 Turkish Liras	(1/28) 164.0989 m ²	21.08.2017
159/25	Mustafa Ince	Permanent loss of land	Expropriation	CLOSED - Expropriated with compensation payment at replacement cost with negotiated settlement	5,000.09 Turkish Liras	(1/28) 164.0989 m ²	21.08.2017
159/25	Fatma Ciki	Permanent loss of land	Expropriation	CLOSED - Expropriated with compensation payment at replacement cost with negotiated settlement	5,000.09 Turkish Liras	(1/28) 164.0989 m ²	21.08.2017
159/25	Ramazan Ince	Permanent loss of land	Expropriation	CLOSED - Expropriated with compensation payment at replacement cost with negotiated settlement	5,000.09 Turkish Liras	(1/28) 164.0989 m ²	21.08.2017
159/25	Abdullah Ince	Permanent loss of land	Expropriation	CLOSED - Expropriated with compensation payment at replacement cost with negotiated settlement	5,000.09 Turkish Liras	(1/28) 164.0989 m ²	21.08.2017
159/25	Gulsum Eyyik	Permanent loss of land	Expropriation	CLOSED - Expropriated with compensation payment at replacement cost with negotiated settlement	5,000.09 Turkish Liras	(1/28) 164.0989 m ²	21.08.2017
159/25	Sehriban Ince	Permanent loss of land	Expropriation	CLOSED - Expropriated with compensation payment at replacement cost with negotiated settlement	1,666.70 Turkish Liras	(1/84) 54.6996 m ²	21.08.2017
159/25	Serkan Ince	Permanent loss of land	Expropriation	CLOSED - Expropriated with compensation payment at replacement cost with negotiated settlement	1,666.70 Turkish Liras	(1/84) 54.6996 m ²	21.08.2017
159/25	Ayse Demirbas	Permanent loss of land	Expropriation	CLOSED - Expropriated with compensation payment at replacement cost with negotiated settlement	1,666.70 Turkish Liras	(1/84) 54.6996 m ²	21.08.2017
TOTAL					140,002.62 Turkish Liras	4,594.77 m²	21.08.2017



This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliği, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklaşa finanse edilmektedir

3. ENTITLEMENT MATRIX

The Entitlement Matrix (EM) shown below as Table 3.1 describes the proposed compensation for each type of identified PAP, including the compensation provided by Derebucak Municipality.

Table 3.1 Entitlement Matrix

Affected Categories	Entitlement
Partial loss of land	Full replacement cost
Structures (including houses) and other fixed assets on the land (barns, shacks, wells, fences, etc.)	Full replacement cost. No depreciation will be deducted. <i>(There were structures and other fixed assets on the lands such as barns, shacks, wells, fences, etc.)</i>
Crops, trees, and other land-based products	The crop value (market price) and investment amount made for the crop (input, labor, age of trees). There are agricultural activities still carried out on the acquired lands. Compensation for standing crops will be made to rightful owners before construction starts, where applicable harvest will be waited for.

* The Entitlement Matrix is prepared according to SCP-II's LARPF (<https://documents1.worldbank.org/curated/en/713231554109393090/Land-Acquisition-and-Resettlement-Policy-Framework.pdf>)



This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliği, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklaşa finanse edilmektedir

4. INVENTORY OF LAND & ASSETS ACQUIRED FROM PRIVATE OWNERS	
4.1 Inventory of Land & Assets Acquired from Private Owners (Expropriation)	
Expropriation 1 Parcel No: 159/25	
Name of Legal Owner(s)	EMINE KURTCU ⁴ (Arzu Kurtcu (Emine Kurtcu's grandchild) was interviewed.)
Number of Household living in the Resident	None
Number of People living in the Resident	None
Name of Illegal User(s)	None
Land user	None
Parcel No	25
Address / Location	Derebucak Neighborhood
Project Component: Area(s) / plots(s) acquired (m ²)	4,594.77 m ² (1/4) - 1,148.69 m ²
Land acquisition method	Expropriation
Land use: pasture, agriculture, residence, etc.	Agriculture
User's total land holding (m ²); % taken for project	-
Owner's total land holding (m ²); % taken for project	4,594.77 m ² ; 100% (No information was provided by landowner regarding their total land holding.)
Inventory of any structures or other fixed or productive assets (wells, fences, trees, field crops, etc.) affected	None
Distance between previous residence to current residence in case the acquired land was used for residence	NA.
Indicate if land was rented or informally used by another party	None
Indicate if non-owner users had assets, trees, crops, etc. affected	None
Indicate if land-based activity is significant source of income for owner	None
Indicate if land-based activity is significant source of income for land user	Land-based activity has just 1.3% impact on land user's (Ahmet Gulcan) income sources.
Compensation paid (add transaction fee)	Total Compensation fee for 159/25 = 35,000.66 TL (Thirty- five thousands Turkish Liras)
Dates delivered	21.08.2017
Impact on income of owner	-
Impact on income of user	-
5. CONSULTATIONS, COMMUNICATIONS & MANAGEMENT OF GRIEVANCES AND IMPLEMENTATION ISSUES	
Arzu Kurtcu was interviewed since Emine Kurtcu passed away. Her family has been living in Germany since the 60's, therefore, she had no issues or comments to point out.	

⁴ Emine Kurtcu passed away after the expropriation process.



This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliği, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklaşa finanse edilmektedir

Expropriation 2	
Parcel No: 159/25	
Name of Legal Owner(s)	AHMET INCE
Number of Household living in the Resident	None
Number of People living in the Resident	None
Name of Illegal User(s)	None
Land user	None
Parcel No	25
Address / Location	Derebucak Neighborhood
Project Component: Area(s) / plots(s) acquired (m ²)	4,594.77 m ² (1/28) - 164.10 m ²
Land acquisition method	Expropriation
Land use: pasture, agriculture, residence, etc.	Agriculture
User's total land holding (m ²); % taken for project	-
Owner's total land holding (m ²); % taken for project	4,594.77 m ² ; 100% (No information was provided by landowner regarding their total land holding.)
Inventory of any structures or other fixed or productive assets (wells, fences, trees, field crops, etc.) affected	None
Distance between previous residence to current residence in case the acquired land was used for residence	NA.
Indicate if land was rented or informally used by another party	None
Indicate if non-owner users had assets, trees, crops, etc. affected	None
Indicate if land-based activity is significant source of income for owner	None
Indicate if land-based activity is significant source of income for land user	Land-based activity is has just 1.3% impact on land user's (Ahmet Gulcan) income sources.
Compensation paid (add transaction fee)	Total Compensation fee for 159/25 = 5,000.09 TL (Five thousands Turkish Liras)
Dates delivered	21.08.2017
Impact on income of owner	-
Impact on income of user	-

5. Consultations, Communications & Management of Grievances and Implementation Issues

The landowner stated that he was not interested in the land and received a share of inheritance. He stated that the compensation fee was paid into their bank accounts within 15-30 days.



This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliği, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklaşa finanse edilmektedir

Expropriation 3	
Parcel No: 159/25	
Name of Legal Owner(s)	HASAN CİKİ (Fatma Ciki's Husband)
Number of Household living in the Resident	None
Number of People living in the Resident	None
Name of Illegal User(s)	None
Land user	None
Parcel No	25
Address / Location	Derebucak Neighborhood
Project Component: Area(s) / plots(s) acquired (m ²)	4,594.77 m ² (1/28) - 164.10 m ²
Land acquisition method	Expropriation
Land use: pasture, agriculture, residence, etc.	Agriculture
User's total land holding (m ²); % taken for project	-
Owner's total land holding (m ²); % taken for project	4,594.77 m ² ; 100% (No information was provided by landowner regarding their total land holding.)
Inventory of any structures or other fixed or productive assets (wells, fences, trees, field crops, etc.) affected	None
Distance between previous residence to current residence in case the acquired land was used for residence	NA.
Indicate if land was rented or informally used by another party	None
Indicate if non-owner users had assets, trees, crops, etc. affected	None
Indicate if land-based activity is significant source of income for owner	None
Indicate if land-based activity is significant source of income for land user	Land-based activity is has just 1.3% impact on land user's (Ahmet Gulcan) income sources.
Compensation paid (add transaction fee)	Total Compensation fee for 159/25 = 5,000.09 TL (Five thousands Turkish Liras)
Dates delivered	21.08.2017
Impact on income of owner	-
Impact on income of user	-
5. Consultations, Communications & Management of Grievances and Implementation Issues	
<p>The landowner stated that after the Derebucak fire in 1955, the government gave families in Derebucak the right to live abroad and he and his family moved to Germany. Therefore, his wife (Fatma Ciki) was not interested in the land and received a share of the inheritance.</p>	



This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliği, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklaşa finanse edilmektedir

Expropriation 4 Parcel No: 159/25	
Name of Legal Owner(s)	AYSE INCE (Ramazan Ince's daughter)
Number of Household living in the Resident	None
Number of People living in the Resident	None
Name of Illegal User(s)	None
Land user	None
Parcel No	25
Address / Location	Derebucak Neighborhood
Project Component: Area(s) / plots(s) acquired (m ²)	4,594.77 m ² (1/28) - 164.10 m ²
Land acquisition method	Expropriation
Land use: pasture, agriculture, residence, etc.	Agriculture
User's total land holding (m ²); % taken for project	-
Owner's total land holding (m ²); % taken for project	4,594.77 m ² ; 100% (No information was provided by landowner regarding their total land holding.)
Inventory of any structures or other fixed or productive assets (wells, fences, trees, field crops, etc.) affected	None
Distance between previous residence to current residence in case the acquired land was used for residence	Approximately one (1) km
Indicate if land was rented or informally used by another party	None
Indicate if non-owner users had assets, trees, crops, etc. affected	None
Indicate if land-based activity is significant source of income for owner	None
Indicate if land-based activity is significant source of income for land user	Land-based activity is has just 1.3% impact on land user's (Ahmet Gulcan) income sources.
Compensation paid (add transaction fee)	Total Compensation fee for 159/25 = 5,000.09 TL (Five thousands Turkish Liras)
Dates delivered	21.08.2017
Impact on income of owner	-
Impact on income of user	-

5. Consultations, Communications & Management of Grievances and Implementation Issues

The landowner stated that her father was alive during the expropriation process. She stated that upon the request of her family, the compensation fee was agreed during the negotiations period with KOSKI and enhanced and the compensation fee was paid into their bank accounts within 15-30 days.



This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliği, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklaşa finanse edilmektedir

Expropriation 5	
Parcel No: 159/25	
Name of Legal Owner(s)	ABDULLAH INCE
Number of Household living in the Resident	None
Number of People living in the Resident	None
Name of Illegal User(s)	None
Land user	None
Parcel No	25
Address / Location	Derebucak Neighborhood
Project Component: Area(s) / plots(s) acquired (m ²)	4,594.77 m ² (1/28) - 164.10 m ²
Land acquisition method	Expropriation
Land use: pasture, agriculture, residence, etc.	Agriculture
User's total land holding (m ²); % taken for project	-
Owner's total land holding (m ²); % taken for project	4,594.77 m ² ; 100% (The landowner stated that the expropriated land is only 5% of the total land owned.)
Inventory of any structures or other fixed or productive assets (wells, fences, trees, field crops, etc.) affected	None
Distance between previous residence to current residence in case the acquired land was used for residence	NA.
Indicate if land was rented or informally used by another party	None
Indicate if non-owner users had assets, trees, crops, etc. affected	None
Indicate if land-based activity is significant source of income for owner	None
Indicate if land-based activity is significant source of income for land user	Land-based activity is has just 1.3% impact on land user's (Ahmet Gulcan) income sources.
Compensation paid (add transaction fee)	Total Compensation fee for 159/25 = 5,000.09 TL (Five thousands Turkish Liras)
Dates delivered	21.08.2017
Impact on income of owner	-
Impact on income of user	-

5. Consultations, Communications & Management of Grievances and Implementation Issues

The landowner stated that there is no positive or negative impact on his income sources. He stated that he supports and will continue to support anything that serves the public welfare. He also added that the compensation paid was a good amount at that time.



This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu proje Avrupa Birliği, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklaşa finanse edilmektedir

Expropriation 6	
Parcel No: 159/25	
Name of Legal Owner(s)	ZEYNEP INCE ⁵ (Mother of Sehruban Ince, Ayse Demirbas and Serkan Ince)
Number of Household living in the Resident	None
Number of People living in the Resident	None
Name of Illegal User(s)	None
Land user	None
Parcel No	25
Address / Location	Derebucak Neighborhood
Project Component: Area(s) / plots(s) acquired (m ²)	4,594.77 m ² (1/84) - 54.10 m ² per each landowner
Land acquisition method	Expropriation
Land use: pasture, agriculture, residence, etc.	Agriculture
User's total land holding (m ²); % taken for project	-
Owner's total land holding (m ²); % taken for project	4,594.77 m ² ; 100% (The landowner stated that the expropriated land is only 5% of the total land owned.)
Inventory of any structures or other fixed or productive assets (wells, fences, trees, field crops, etc.) affected	None
Distance between previous residence to current residence in case the acquired land was used for residence	NA.
Indicate if land was rented or informally used by another party	None
Indicate if non-owner users had assets, trees, crops, etc. affected	None
Indicate if land-based activity is significant source of income for owner	None
Indicate if land-based activity is significant source of income for land user	Land-based activity is has just 1.3% impact on land user's (Ahmet Gulcan - the tenant of Mustafa Ince) income sources.
Compensation paid (add transaction fee)	Total Compensation fee for 159/25 = 5,000 TL (Five thousands Turkish Liras) Sehruban Ince, Ayse Demirbas and Serkan Ince's compensation fees: 1,666.70 Turkish Liras (One thousand and six hundred sixty six Turkish Liras)
Dates delivered	21.08.2017
Impact on income of owner	-
Impact on income of user	-
5. Consultations, Communications & Management of Grievances and Implementation Issues	
The landowner stated that after the Derebucak fire in 1955, the government gave families in Derebucak the right to live abroad and she and her family moved to Switzerland. Therefore, her husband (Hasan Ince) was not interested in the land and during the expropriation process, her husband passed away, and the inheritance was shared among his children.	

⁵ Zeynep Ince was interviewed on behalf of her children (Sehruban Ince, Ayse Demirbas and Serkan Ince), who are the legal owners.



This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliği, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklaşa finanse edilmektedir

Expropriation 7	
Parcel No: 159/25	
Name of Legal Owner(s)	MUSTAFA İNCE
Number of Household living in the Resident	None
Number of People living in the Resident	None
Name of Illegal User(s)	None
Land user	AHMET GULCAN (Tenant)
Parcel No	25
Address / Location	Derebucak Neighborhood
Project Component: Area(s) / plots(s) acquired (m ²)	4,594.77 m ² (1/28) - 164.10 m ²
Land acquisition method	Expropriation
Land use: pasture, agriculture, residence, etc.	Agriculture
User's total land holding (m ²); % taken for project	4,594.77 m ² ; 1.3% -Total land use 300 decaire.
Owner's total land holding (m ²); % taken for project	-
Inventory of any structures or other fixed or productive assets (wells, fences, trees, field crops, etc.) affected	Strawberry seedlings and vegetables
Distance between previous residence to current residence in case the acquired land was used for residence	Approximately 10 km
Indicate if land was rented or informally used by another party	None
Indicate if non-owner users had assets, trees, crops, etc. affected	None
Indicate if land-based activity is significant source of income for owner	None
Indicate if land-based activity is significant source of income for land user	Land-based activity has just 1.3% impact on land user's income sources.
Compensation paid (add transaction fee)	5000 strawberry seedlings
Dates delivered	21.08.2017
Impact on income of owner	-
Impact on income of user	The tenant was getting a part of his income from the product of this land.
5. Consultations, Communications & Management of Grievances and Implementation Issues	
<p>There is no formal contract between the landowner and the tenant. Upon the request of the land user, 5000 strawberry seedlings were given as compensation by municipality. The land user stated that the yield year of the strawberry seedling is at most 5 years.</p> <p>The land user stated that he rented the land in 2014 and cultivated between 2014 and 2017, and carried out his agricultural activities on another land of his own after the expropriation.</p>	



This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliği, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklaşa finanse edilmektedir

Expropriation 8	
Parcel No: 159/25	
Name of Legal Owner(s)	DURSUN YILMAZ (Ahmet Yılmaz's son)
Number of Household living in the Resident	None
Number of People living in the Resident	None
Name of Illegal User(s)	None
Land user	None
Parcel No	25
Address / Location	Derebucak Neighborhood
Project Component: Area(s) / plots(s) acquired (m ²)	4,594.77 m ² (1/4)- 1,148.69 m ²
Land acquisition method	Expropriation
Land use: pasture, agriculture, residence, etc.	Agriculture
User's total land holding (m ²); % taken for project	-
Owner's total land holding (m ²); % taken for project	4,594.77 m ² ; 100% (No information was provided by landowner regarding their total land holding.)
Inventory of any structures or other fixed or productive assets (wells, fences, trees, field crops, etc.) affected	None
Distance between previous residence to current residence in case the acquired land was used for residence	NA.
Indicate if land was rented or informally used by another party	None
Indicate if non-owner users had assets, trees, crops, etc. affected	None
Indicate if land-based activity is significant source of income for owner	None
Indicate if land-based activity is significant source of income for land user	Land-based activity is has just 1.3% impact on land user's (Ahmet Gulcan) income sources.
Compensation paid (add transaction fee)	Total Compensation fee for 159/25 = 35,000.66 TL (Thirty- five thousands Turkish Liras)
Dates delivered	21.08.2017
Impact on income of owner	-
Impact on income of user	-
5. Consultations, Communications & Management of Grievances and Implementation Issues	
He has no issues or comments to point out.	



This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliđi, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklađa finanse edilmektedir

6. CONCLUSION & REMEDIAL MEASURES

Before preparing this EPSA Report, the PAPs were visited separately on 30th of May 2023. During this fieldwork, interviews were conducted with the PAPs. During the interviews, PAPs stated their opinions about the project and their expectations from the project are as follows:

- It has been stated that the compensation fee was paid into their bank accounts within 15-30 days.
- Landowners stated that they support and will continue to support anything that serves the public welfare. It has been stated that the compensation paid was a good amount at that time.
- Although there is no formal contract between the landowner and the tenant, for income loss as per Entitlement Matrix (EM) and the WB Operational Policies (OP) 4.12, instead of product compensation fee, 5000 strawberry seedlings were given to the land user as compensation by the municipality, upon the request of the land user.
- Information is requested by landowners about the project process.

During the field work, 10 of the 12 parcel owners were interviewed. Interviews with two parcel owners could not be conducted since Gulsum Eylik passed away, and Mustafa Yilmaz is living in Germany. Moreover, Zeynep Ince was interviewed on behalf of her children, Sehiban Ince, Ayse Demirbas and Serkan Ince, who were the legal owners of 1/84th share each, and also, Arzu Kurtcu, who is Emine Kurtcu's grandchild, was interviewed since Emine Kurtcu passed away after the expropriation process.

The land consists of a single parcel named Parcel No. 159/25. The tenant of the entire parcel is Ahmet Gülcan, who leased the parcel from Mustafa İnce on behalf of all parcel owners.

Some recommended remedial measures regarding the above-mentioned expectations of the PAPs are summarized below:

- Regular (monthly) information disclosure to PAPs regarding any new development in the project to be done by KOSKI throughout the construction phase.
- Informative consultation meetings by KOSKI about the technical details, legal rights and procedures of the project before commencement of construction.
- Proper implementation of the grievance redress mechanism by KOSKI and the construction contractor.