

TUZ GÖLÜ GAS STORAGE EXPANSION PROJECT

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ABBREVIATIONS

AIIB	Asian Infrastructure Investment Bank
BOTAŞ	Petroleum Pipeline Corporation
Client	BOTAŞ
Contractor	İÇTAŞ as Construction Contractor
CLO	Community Liaison Officer
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
E&S	Environmental and Social
ETL	Energy Transmission Line
GIS	Geographical Information System
GRM	Grievance Redress Mechanism
GSDP	Tuz Golu Underground Natural Gas Storage Project
GSEP	Tuz Golu Underground Natural Gas Storage Expansion Project
HH	Household
LRP	Livelihood Restoration Plan
M&E	Monitoring and Evaluation
MQ	Mukhtar Questionnaire
PAP	Project Affected Person
PAS	Project Affected Settlement
Project	Tuz Golu Underground Natural Gas Storage Expansion Project
RAP	Resettlement Action Plan
M&E	Monitoring and Evaluation
SeCP	Secondary Crop Payment
SeEP	Secondary Easement Payment
SEP	Stakeholder Engagement Plan
TLS	Transitional Livelihood Support
TRY	Turkish Lira
UGS	Underground Gas Storage
VA	Vulnerability Assessment

GLOSSARY

Addendum(s) to Resettlement Action Plan: While the RAP covered the Project components such as pipelines (natural gas, brine water, fresh water lines), well areas, camp sites and connection lines between wells, it did not cover energy transmission lines, access roads, pump stations and storage tanks as the final designs of these components were not ready at the time of preparation of the RAP. Therefore, two Addendums have been prepared to cover these remaining components of the Project as envisaged previously. Besides, third Addendum is also proposed to cover additional components of GSEP.

Compensation refers to payments made by those causing specified and agreed loss to those who suffer the impairment of access to land, waters and other critical natural resources and livelihoods, or damage to, or destruction of, community members' individual or collective assets of any kind, whether accidental or planned.

Crop payment;

- **For standing crop:** Cost paid for user to start construction without harvesting the cultivated crop in the field.
- **For orphan lands:** Cost paid to use for uncultivated pieces of land.

Economic Displacement refers to loss of income streams or means of livelihood resulting from land acquisition or obstructed access to resources (land, water, or forest) resulting from the construction or operation of a project or its associated facilities.

Land expropriation: This process dispossesses a person, household or community of their land. It is usually done by a public authority in return for compensation. The property is taken either for government use or by delegation to third parties who will devote it to public or civic use or, in some cases, economic development. Compulsory purchase, resumption/compulsory acquisition, or expropriation all refer to the same process.

Land acquisition: A state authority or a company can acquire land by purchasing the land or by gaining the right to access that piece of property (e.g.: through easements or rights of way).

Livelihood refers to the full range of means that individuals, families, and communities utilize to make a living, such as wage based income, agriculture, fishing, foraging, other natural resource based livelihoods, petty trade, and bartering.

Project-affected person (PAP) refers to any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily. Lands owned or used by PAPs may be affected by land acquisition of the Project (directly-PAP) or PAPs may be affected by project because they live or work in the project area (indirectly-PAP).

Project affected settlement (PAS) refers to villages, neighbourhoods and towns in the land use or environmental impact area of the project. Private lands, public lands, common properties located within the boundaries of these settlements are affected by the project.

Replacement cost is the method of valuing assets endorsed by OP 4.12: "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." Replacement cost of an affected asset is equivalent to the amount required to replace the asset in its existing condition. The replacement cost of structures should be equal to the cost of constructing/purchasing a new structure, without making any deductions for depreciation.

Resettlement Action Plan (RAP): The document in which a private company or a public institution specifies the procedures that it will follow and the actions that it will take to ensure that the people affected by the project are duly compensated for their losses. The project may not have an impact on living quarters and thus the impacts may be limited to economic displacements.

Stakeholder refers to individuals, groups, organizations, and institutions interested in and potentially affected by a project or having the ability to influence a project.

Standing crop is the product that is in the field just before construction begins and needs to be compensated with crop payment prior to construction.

Vulnerable groups: These are potentially more negatively impacted by resettlement than others because of their gender, ethnicity, age, physical or mental disability, or socio-economic status or project-related disadvantages. Vulnerable groups that may be affected by the GSEP were anticipated in the RPF and RAP documents. Vulnerable group categories determined in these documents were women (in particular female-headed households), elderly people over the age of 65 who live alone and need care, physically or mentally disabled people, PAPs whose land will be expropriated for the second time, PAPs whose land will be affected by multiple project components, seasonal workers and contract farmers. RAP stipulates measures for vulnerable groups; and states that; “livelihood impacts on these vulnerable groups will be assessed and compensation will be provided by RAP Fund where necessary.” PAPs whose lands are subject to multiple impacts and contract farmers are entitled to Transitional Livelihood Support as per Entitlement Matrix in RAP.

1. INTRODUCTION

Elimination or reduction of the environmental and social negative effects of investments is guaranteed by international standards. While applying these standards, some groups need more attention and care than others and these are referred as “vulnerable groups”. “The World Bank Directive: Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups” defines disadvantaged or vulnerable individuals as those individuals who, by virtue of, for example, their age, gender, ethnicity, religion, physical, mental or other disability, social, civic or health status, sexual orientation, gender identity, economic disadvantages or indigenous status, and/or dependence on unique natural resources, may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a projects benefits.¹ Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. World Bank requires an identification of groups or individuals affected by the project that may be disadvantaged or vulnerable; and an assessment of project risks and impacts, identification of differentiated mitigation measures, as they pertain to the disadvantaged or vulnerable individuals or groups that are identified.

The potential resettlement impacts of Tuz Golu Underground Natural Gas Storage Expansion Project (GSEP), which includes new facilities to be developed in terms of capacity increase of the Tuz Golu Underground Natural Gas Storage (GSDP), on vulnerable groups has been revealed by RAP and Addendum to RAP studies, and its management has been planned with entitlement matrix and mitigation measures. In addition, BOTAS has already developed and implemented a Stakeholder Engagement Plan which includes differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable. Potential impacts of the project caused by the land acquisition are identified and compensation/measures have been determined within the framework of these plans. The purpose of this additional study is both the identification of vulnerable people (who are affected by the Project components covered in RAP and First Addendum) and the residual impacts of the project's land acquisition on them as well as planning strategies/actions to eliminate these impacts according to RAP and First Addendum. This planning will guide the management of the new vulnerabilities and impacts on new vulnerable individuals and households that will occur with the addendum to be prepared for the additional land use of the components of the Project.

¹ Bank Directive on Addressing Risks and Impacts on Disadvantaged or Vulnerable Individuals or Groups (2016) <http://documents1.worldbank.org/curated/en/573841530208492785/Environment-and-Social-Framework-ESF-Good-Practice-Note-on-Disability-English.pdf>

2. PROJECT OVERVIEW

2.1. Brief Project Description

Tuz Golu Underground Natural Gas Storage Expansion Project (GSEP) is located in Sultanhani locality of Aksaray Province, at about 40 km south of Tuz Golu and consists of several components such as pipelines (fresh water line from Hirfanlı Dam to UGS Sites, brine discharge line from UGS sites to Tuz Golu, and natural gas branch line to Eastern Anatolia Natural Gas Main Transmission Line), pump stations and storage tanks, energy transmission lines, surface facilities and UGS Sites. GSEP is planned to increase the capacity of the existing UGS Project from 1.2 bcm to 5.4 bcm by constructing additional salt caverns with similar properties of the existing caverns. In addition to the existing UGS Project facilities, additional caverns, surface facilities, natural gas connection pipeline, fresh water and brine discharge pipelines, connection lines between caverns, pump stations, storage tanks, access roads and energy transmission lines (ETLs) are under construction in scope of GSEP.

The Project development objective is to increase the reliability and security of gas supply in Turkey by expanding underground gas storage capacity in the country. It aims to regulate seasonal natural gas fluctuations, fulfilling purchase and sale commitments, ensuring flexibility in gas purchase-sale agreements and thus raising the bargaining power, ensuring uninterrupted gas supply and efficient pipeline operation, meeting the excessive demand during summer months due to electricity generation, creating a strategic reserve against unforeseeable technical disruptions in gas supply and providing service to all consumers in the natural gas system of Turkey. The primary beneficiaries are gas consumers across Turkey, including residential and business consumers, industrial and electricity generators.

Natural gas plays an important role in decarbonizing Turkey's electricity system because it helps integrate large scale renewable energy into the electricity grid and enables the displacement of coal which emits twice as much carbon dioxide. Upon completion of the ongoing project plus the proposed project and the Silivri facility, Turkey will have doubled its gas storage capacity from current levels to about 9.7 bcm – or about 16 percent of the forecasted 2024 annual demand.²

BOTAŞ' financing plan consists of loans from the World Bank and the Asian Infrastructure Investment Bank (AIIB) of US\$600 million each. World Bank policies and procedures on safeguards, procurement, financial management, project monitoring, and reporting are being used for the Project activities financed in whole or in part out of the loan proceeds of the Bank and AIIB under a joint co-financing arrangement.

The construction phase of the Project has started in the second quarter of 2019 and planned to be completed in last quarter of 2023. After the completion of the Project construction phase, it is planned to have an estimated 30 years of operation phase.

The day-to-day project implementation is carried out by a Project Management Unit within BOTAŞ led by the Head of the Storage Department. Other departments provide inputs in their areas of responsibility, including procurement, finance, environment and social safeguards. The progress of project implementation is being reported and evaluated at various levels (BOTAŞ' Construction Contractor and Environmental and Social Consultants).

2.2. Land Acquisition Background

The land acquisition induced impacts of the Project have been introduced in the ESIA and fundamentals of mitigating these impacts have been set out in the Project's RPF. Later, the RAP disclosed in July 2019 served to provide detail on land-based impacts of the Project and defined the approach and measures to be adopted to avoid or minimize these impacts. While the RAP covered the Project components such as pipelines (natural gas, brine water, fresh water lines), well areas, camp sites and connection lines between wells, it did

² World Bank, Project Information Document for Turkey Gas Storage Expansion Project

not cover energy transmission lines, access roads, pump stations and storage tanks as the final designs of these components were not ready at the time of preparation of the RAP. Therefore, an Addendum has been prepared to cover these remaining components of the Project as envisaged previously. First Addendum covered the ETL for fresh water line (1 out of 3 ETLs to be established for the Project), pump stations, storage tanks, associated access roads, revised fresh water line route, water intake structure together with the additional assessment of impacts that may be caused from this revision and sub-components. The Second RAP Addendum is currently being finalized and will cover the remaining 2 ETLs (154 KV) and additional well areas (UGSs) as well as access roads between those caverns. A 3rd Addendum as part of an ESIA Addendum Package is envisaged to be developed for connection lines between additional UGS wells, access roads, and the new additional wells within the extended licence area.

The Vulnerability Assessment study includes RAP and Addendum 1 components. According to the up-to-date land acquisition data provided by BOTAS, a total of 1350 parcels were identified as affected by the land acquisition of pipelines, UGSs (excluding additional UGS wells which are subject of Addendum 2), pump station/storage Tanks, access roads, 34,5 kV ETLs and surface facilities of the Project. Table below shows the breakdown of parcels by RAP and Addendum 1. This study has covered all PAPs affected by the components presented in Table-1 below. Total of 8.079.943,88 TRY for the RAP components and 2.487.839,16 TRY for the Addendum-1 Components has been paid and this total compensation amounts include both expropriation and crop payments.

Table 0-1 Breakdown of Affected Number of Parcels by RAP(s)

RAP / Component	Pipelines (including revised freshwater line)	Pump Station/Storage Tanks-Access Roads	Surface Facilities	UGSs	ETL (34,5 kV)	Total
RAP	395	-	15	226	-	636
1 st Addendum to RAP	550	33	-	-	131	714
TOTAL	945	33	15	226	131	1350

In accordance with the RAP, both formal and informal users of affected parcels are being paid with cash compensation for their lost annual/perennial crops or plants (based on the market value after valuation by a specialized commission). Total of 339.048,59 USD has been paid to both formal and informal users for the compensation of their standing crops up to date. The Project has developed a RAP Fund to compensate those affected by the Project, who could not benefit from the compensation stipulated in the Expropriation Law No. 2942. The compensations for the entitlements defined in the RAP are currently being paid from this RAP Fund.

3. VULNERABILITY ASSESSMENT STRATEGY

3.1. Scope of Work

The main objective of the RAP of the Project is to ensure that living standards of those who have encountered land acquisition-induced displacement are restored and improved to pre-Project conditions where possible. However, some may be more adversely affected by displacement than others because they may have limited capacity to cope with resettlement-related issues due to their existing vulnerabilities (gender, age, disabilities etc.). In addition to their non-project related existing vulnerabilities, there might be some vulnerabilities specific to the Project that would lead to their livelihoods being worse off after land acquisition takes place. Therefore, all vulnerabilities need to be considered for the preparation of any assistance that will be provided through the RAP Fund for livelihood restoration.

During the field survey in RAP preparation process, in-depth interviews were conducted with focus group discussions in order to understand the perceptions and expectations of women, the elderly and other vulnerable groups on the Project and to assess potential impacts of the Project on their living conditions. Following vulnerable groups have been identified in RAP;

- Women head of households

- Elderly
- People with disabilities
- Seasonal workers
- Groups subject to Cumulative Impacts
 - PAPs whose lands were affected by multiple project components
 - PAPs whose lands were expropriated for the second time (for the permanent components)
- Contract farming³

Vulnerable groups were evaluated in two categories as (1) project dependent (Groups subject to Cumulative Impacts and contract farming) and (2) independent (women, elderly, people with disabilities, seasonal workers). In the first group, problems of obtaining compensation/supports entitled in RAP EM were determined (Chapter 4). In the second group, problems in accessing engagement opportunities (GRM, information etc.) have been identified (Chapter 5). All of these groups are directly-PAP whose lands (owned or used by them) are affected by land acquisition of the Project, while seasonal agricultural workers are indirectly-PAP.

3.2. Vulnerability Identification and Assessment Strategy

Identification of vulnerable people was based on multiple information sources. Some of the vulnerable groups (independent vulnerabilities) were already identified in the RAP and 1st Addendum such as women headed households, elderly and people with disabilities. Available documents and information of vulnerable identified during previous studies of BOTAS have been reviewed before performing the interviews to confirm all collected data and identify missing information to be fulfilled regarding pre-identified vulnerable people, the duplicated names etc. to ensure that all relevant information regarding vulnerable groups have been gathered for data analysing and assessment. PAPs with dependent cumulative vulnerabilities (multiple components and second time expropriation) have been identified by utilizing the expropriation lists and Geographical Information System (GIS) data. Besides, all records (interactions/complaints) from GRM matching the “vulnerable” criterion have been scanned to collect data that may be useful for identifying the vulnerable groups in affected settlements.

Determination of vulnerable PAPs has been made for pipelines and 34,5 kV ETL through mukhtar interviews as the sampling method was used during RAP and First Addendum to RAP studies and a whole identification (full census) was not performed. Vulnerable people affected by well areas, surface facilities and access roads were precisely identified in RAP and First Addendum studies as the full census method was applied during survey. However, some PAPs could not have been reached during RAP and First Addendum as they either live abroad or are in another city. Efforts were made again to reach these PAPs and include them in the identification through telephone conversations with headmen and other villagers. In this study, all mukhtars (28 settlements) were interviewed with the thought that there might be vulnerable PAPs that could not be detected before. The household questionnaires containing questions on land acquisition and construction phases were conducted with all identified vulnerable individuals.

All households identified within the RAP and First Addendum have been included in scope of the study as potential vulnerabilities and the contact information of the owners and users of these parcels (priority was given to the user for VA interviews, so one or sometimes two people were interviewed for one parcel) were obtained from GRM records and headmen. Some PAPs registered as vulnerable individual in RAP and

³ Contract farming involves agricultural production being carried out on the basis of an agreement between the buyer and farm producers. Sometimes it involves the buyer specifying the quality required and the price, with the farmer agreeing to deliver at a future date. More commonly, however, contracts outline conditions for the production of farm products and for their delivery to the buyer’s premises. The farmer undertakes to supply agreed quantities of a crop or livestock product, based on the quality standards and delivery requirements of the purchaser. In return, the buyer, usually a company, agrees to buy the product, often at a price that is established in advance. The company often also agrees to support the farmer through, e.g., supplying inputs, assisting with land preparation, providing production advice and transporting produce to its premises.

Addendum 1 were found not to fit these categories and were removed from the list, while some new cases were included also. The numbers of households identified with vulnerabilities are presented in the table below.

Table 0-2 Number of identified AHs with vulnerabilities

Type of vulnerability	Category of AHs with vulnerabilities	Number of AHs
Independent vulnerabilities	Number of AHs has woman head of household	9
	Number of AHs has member with disabilities	3
	Number of AHs has elderly member who need assistance	22
Project dependent vulnerabilities	Number of AHs engage with contract farming	9 ⁴
	Number of AHs engage with agricultural activity on cumulatively impacted parcels (multiple project component and/or second time expropriation for AGIs ⁵)	46
TOTAL		89

Source: Vulnerable people identification of RAP, Addendum 1 and VA studies.

The identified vulnerable people have been reached by telephone and interviewed. When possible, the interview has been conducted with the vulnerable person himself/herself, if not possible, with his/her relative.

3.3. Limitations of the study

Conducting research in pandemic conditions has some limitations / difficulties. First of all, telephone interviews lack some of the communication advantages of face-to-face interviews. However, it was observed that the telephone interview allowed to reach more people compared to village visits. In particular, it was possible to reach those living outside of the settlement. Nevertheless, there are people who have moved away from their land and are not known in the region and whose phone number could not be obtained and this was the most important difficulty faced here. One of the interviewers had to work only to get the contact information of the impacted PAPs.

Apart from these, there are some difficulties in communicating with vulnerable individuals. Therefore, interviews were conducted by experienced social experts. Questioning vulnerable individuals during interviews with muhtars can create expectations for help. Due to this expectation, care was taken not to deviate from the purpose of the study.

Heads or representatives of all vulnerable households were reached during the study. An elderly individual and a woman head of household identified within the scope of RAP and Addendum 1 could not be reached despite all the efforts. These two PAPs have probably moved to another region or abroad or misidentified during RAP and Addendum 1 studies. Users of multiple impacted parcels have been reached, but five parcels, one of which is public land (road), are not used for agricultural purposes.

⁴ The number of impacted households engaged with contract farming is 16. However, since 7 of these households were already listed as user of cumulatively impacted parcels, they were not included in this number for the second time as contracted farmer.

⁵ Excluding second time easement for pipelines

4. PROJECT DEPENDENT VULNERABILITIES

Project dependent vulnerabilities are defined as following; (i) groups subject to cumulative impacts, (ii) contract farmers. Groups subject to cumulative impacts are also evaluated under two separate category; (i) PAPs whose land is affected by multiple Project components and (ii) PAPs whose land is subject to second time expropriation due to GSDP and GSEP. Total of 46 households whose land is affected by multiple Project components and 9 contract farmers were identified in VA study. EM of RAP specifies transitional-livelihood support for these groups and accordingly, 6-months TLS have provided to the identified 55 households under these categories⁶. Compensation payments can be monitored from the “Implementation Summary” tables presented in Appendix 1 and Appendix 2.

Additional crop payments have been paid to all contract farmers to correspond to the increase in yield in sugar beet. The sum of the additional crop payments paid in different amounts depending on the size of the affected lands is approximately 80,000 TRY. Payments are recorded into Implementation Summaries (Appendix 1 and Appendix 2).

Other group under cumulative impact category (PAPs whose lands were expropriated for the second time due to GSDP and GSEP) does not have a cash compensation entitlement in the EM like transitional livelihood support. However, additional compensations are defined to cover the second time expropriation impacts on their lands. This group will be evaluated under two subgroups:

- Those affected by permanent expropriation
- Those affected by permanent easement

AGIs were built on the parcels of those affected by permanent expropriation. The users of these parcels were already included in the list of vulnerable groups, as they were also affected by the multiple components of GSEP. For those affected by permanent easement, a separate evaluation was made, and additional compensations were planned within the scope of livelihood restoration measures.

More detailed evaluations on dependent vulnerable groups are presented under the following headings.

4.1. Groups subject to Cumulative Impacts

According to RAP, groups subject to cumulative impacts are classified as;

- PAPs whose land will be affected by multiple project components,
- PAPs whose land will be expropriated for the second time (GSDP and GSEP).

4.1.1. PAPs whose land were affected by multiple components of GSEP

Parcels under the effect of multiple components of GSEP were determined by examining the expropriation lists of RAP and First Addendum and also by analyzing/superposing the GIS data to identify multiple component impacts. As the expropriation lists of BOTAS do not present disaggregated data for access roads and connection lines, the GIS experts have analyzed one-by-one the parcels that are affected by multiple components by using Project’ GIS files to ensure that no parcel is unidentified although having multiple component impact. Parcels with the following combinations are identified from expropriation data and GIS analysis. The number of affected parcels among the project components that have been evaluated within the scope of RAP and Addendum 1 are presented in the table below.

Table 0-3 Number of multipleaffected parcels

Multiple components	Number of affected parcels in RAP	Number of Affected Parcels in 1st Addendum	Total
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⁶ At the beginning of the VA study, TLS payments were proposed and paid for less than 6 months to some affected households. Later, additional payments were made to complete these payments in 6 months. For this reason, some people have two payment receipts in their name (See. Appendix 3, Appendix 4, Appendix 5 and Appendix 6).

UGSs + pipelines/connection lines	26	-	26
PS&STs + Access road	-	1	1
Pipelines + PS&STs + Access roads	-	5	5
Pipelines + PS&STs	-	14	14
Pipelines + Access roads	-	1	1
Pipelines + 34 kV ETL	-	19	19
34 kV ETL + Access road + pipelines	-	2	2
34 kV ETL + PS&STs + Access road + pipelines	-	3	3
34 kV ETL + PS&STs	-	1	1
TOTAL	26	46	72

72 parcels which are under multiple component impacts have been identified as vulnerability sources in accordance with RAP. These parcels are specified in the implementation summary tables in Appendix 1 and Appendix 2. 68 of 72 parcels are used for agricultural purposes. 68 parcels are used by 46 households. All of these 46 AHs were paid 6-month Transitional Livelihood Supports (TLSs) according to EM. For the household-based list of multiple component impact group, see Appendix 3⁷.

Table 0-4 Summary numbers of multiple-affected parcels and users/AHs

Number of parcels affected by multiple components of GSEP	72
Number of parcels under revision plan	1
Number of parcels unused (no agricultural activity)	3
Number of parcels with identified users / AHs	68
Number of AHs use the parcels under multiple component impacts	46
Number of HHs 6-month TLS paid	46

4.1.2. PAPs whose land were expropriated for the second time

There is another group identified in RAP among the cumulative impacted groups: PAPs whose land will be expropriated for the second time (GSDP and GSEP). Accordingly, cumulative impacted parcels mentioned in this study include multiple project component impact as well as second time expropriation due to GSDP and GSEP. The EM specifies “Additional income restoration measures may be also designed, including provision of employment in the Project” for this group. Following evaluations were made under two subgroups:

- Those affected by permanent expropriation
- Those affected by permanent easement

Owner/Users of parcels expropriated for the second time (previously affected by GSDP and later by GSEP) have been defined as vulnerable group in the RAP; however, although EM states that additional measures may be designed, it does not specify what these measures are. RAP defines this vulnerable group category as follows;

“Since the pipeline route of the GSEP is very close and parallel to the existing UGS Project route, a significant portion of the parcels affected by the current Project are also affected by GSEP and will be expropriated second time. PAPs whose land will be expropriated for the second time are considered as vulnerable since they may not have enough land left to continue **agricultural activity** or the residual lands may not be economically **viable** anymore.”

On the other hand, under the 5th impact category⁸ of the Entitlement Matrix in the RAP, TLS payments are

⁷ Since the appendices contain personal information, they will be removed when the VA report is disclosed.

⁸ “Temporary or permanent loss of livelihoods that may be caused by loss of land, access to land, physical relocation of residential areas and other livelihood related structures, lands being unviable due to expropriation etc.”

also defined for those whose lands are affected by the project's above-ground facilities and whose livelihoods are depending on land such as agriculture, livestock etc. (apart from the TLS payments defined for vulnerable groups). For this reason, the parcels subject to expropriation for the second time for above-ground facilities were included in the field survey of the VA study. In other words, if components of GSEP such as SFs, PSs, STs are built on parcels that GSDP has previously affected, the users of these parcels are considered within the scope of VA. According to the expropriation lists, the number of parcels with this feature is 14 (and the number of PAPs impacted is 8 and has already been evaluated within the scope of VA.

Table 0-5 Second time expropriated parcels for AGIs of GSEP

District	Settlement	Parcel	Ownership	Explanation
SARIYAHŞI	BOĞAZKÖY	892	Private	This parcel was already covered by the VA study as it was also affected by multiple project components of the GSEP.
SARIYAHŞI	BOĞAZKÖY	893	Private	This parcel was already covered by the VA study as it was also affected by multiple project components of the GSEP.
SARIYAHŞI	BOĞAZKÖY	896	Private	This parcel was already covered by the VA study as it was also affected by multiple project components of the GSEP.
SARIYAHŞI	BOĞAZKÖY	897	Private	This parcel was already covered by the VA study as it was also affected by multiple project components of the GSEP.
SARIYAHŞI	BOĞAZKÖY	3806	Private	This parcel was already covered by the VA study as it was also affected by multiple project components of the GSEP.
SARIYAHŞI	BOĞAZKÖY	3818	Private	User was already covered by the VA study as another his land was also affected by multiple project component of the GSEP.
AĞAÇÖREN	AĞAÇÖREN	239/80	Private	User was already covered by the VA study as another his land was also affected by multiple project component of the GSEP.
MERKEZ	CERİT KÖYÜ	962	Private	This parcel was already covered by the VA study as it was also affected by multiple project components of the GSEP.
MERKEZ	CERİT KÖYÜ	968	Private	Vacant (Contact has been made with the owner)
MERKEZ	CERİT KÖYÜ	969	Public (Road)	Road - public land
MERKEZ	CERİT KÖYÜ	194	Private	This parcel was already covered by the VA study as it was also affected by multiple project components of the GSEP.
SULTANHANI	GAZİ MAH	5254	Private	This parcel was already covered by the VA study as it was also affected by multiple project components of the GSEP.
SULTANHANI	GAZİ MAH	7934	Private	This parcel was already covered by the VA study as it was also affected by multiple project components of the GSEP.
SULTANHANI	GAZİ MAH	13/5164	Private	This parcel was already covered by the VA study as it was also affected by multiple project components of the GSEP.

Temporary and permanent easement is also allocated for the construction of GSEP components on parcels that were previously used for the GSDP. The RAP does not specify a commitment regarding the parcels to which easement is allocated for the second time. Still, the parcels where the pipelines of GSEP and GSDP intersect are listed under the vulnerable groups section of RAP. To ensure that all vulnerable group categories are included and evaluated as part of this VA study, the parcels affected by easement rights establishment under both GSDP and GSEP are identified and assessed in following paragraphs.

To make a better evaluation, it is necessary to mention two groups that are exposed to cumulative impacts: owners and users. While users of some parcels are already owners, some parcels can be used by people who do not have title deed or shares, in other words, who are not owners or shareholders. Cumulative effects

might have caused different results for both groups. Expected impacts for these groups are explained in the table below, along with evaluations regarding the impact. In order to evaluate more in detail these impacts, interviews were held with the Expropriation unit of BOTAS, RAP experts and officials. As a result of these meetings and evaluations, it was decided to support the owners/shareholders and the non-owner users with additional livelihood restoration measures.

Table 0-6 Evaluations on owners of the cumulatively impacted parcels by permeant easement

PAPs	Impact	Evaluation
Owners of the parcels cumulatively impacted by permanent easement	Decrease in value of the land with second easement	<p>Establishment of easement rights on the property may cause depreciation of the land. This decrease is taken into consideration when calculating the value of the easement right. Under these conditions, capitalization rate, which is one of the inputs used to evaluate the land, is inevitably higher because of the rising risks and declining demands. The easement payment is paid to compensate for this loss of value and some usage restrictions.</p> <p>According to the Land Acquisition Law No. 2942, the value of the property will be determined (by using the revenue method for lands and by its market value compared to other plots) as if easement has not been granted and then the value of the right will be established. The decrease in the value of farmlands that is caused as a result of the constitution of the easement is explained by the difference of the value before and after granting easement and according to Article 11 of the Land Acquisition Law, No. 2942, it needs to be determined by using the income method for lands.</p> <p>Article 11 of the Expropriation Law states that “When constituting easement through expropriation, the decrease in the value of the property or the resource shall be explained with its reasons. This decrease is the cost of expropriation.” When calculating the value of the easement by using the revenue method, first of all, “decrease in the value” is determined, then the duration of the easement.</p> <p>The depreciation of the parcel has been compensated with the objective value increase method by BOTAS. Accordingly, the rate of loss of value that occurred in the land has been calculated with expert reports and an easement fee paid as compensation for this loss. The approximate value decrease in parcels allocated to easement is 20% or more. Therefore, payment is made by adding value to the easement price at the rate of depreciation. See Table 0-7 for examples. BOTAS applies this method to the lands where it is permanently expropriated (ownership right), providing compensation in full replacement cost.</p> <p>The fact that an affected land was also affected by the pipeline of GSDP in the past or the land was affected by the land acquisition of another project are among the factors that cause depreciation. Payment of expropriation cost without taking into account the factors that cause depreciation in all lands is a method adopted for compensation payment at full replacement cost. See Table 0-7 for examples.</p> <p>The easement fee is paid as a compensation for the usage right and loss of value in the land. However, people may still not want to buy parcels with two separate pipelines under them. Although agricultural activities continue with some restrictions in these parcels, the parcels that are affected once by the pipeline may be more advantageous than parcels that are affected twice by the pipeline. In order to compensate for such depreciation, BOTAS paid "secondary easement payment (SeEP)" to the owners of the parcels expropriated for the second time, in proportion to the effect rate on the parcel. For example, SeEP equal to 25% of the previous easement payment for the parcel where easement (Both GSDP+GSEP) has been allocated for 25% of it.</p>
Non-owner users of the parcels cumulatively impacted by permanent easement	Agricultural activity being affected by construction activities for the second time	<p>Allocating easement for GSEP on the lands expropriated for the second time means that agricultural activity is stopped due to construction works for the second time. The negative effect of the disruption in agricultural activity on the income sources is eliminated by the crop payments. However, the second interruption of agricultural activity can be discouraging for non-owner users who carry out agricultural activities on lands that do not belong to them. Therefore, BOTAS paid “secondary crop payment (SeCP)” to the non-owner users of the parcels that are</p>

		affected by the pipeline for the second time (GSDP + GSEP) in proportion to the impact rate in the parcel. For example, SeCP equal to 25% of the previous crop payment for the parcel where easement has been allocated for 25% of it.
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Examples related to objective value increase method that mentioned in table above are presented in Table 0-7. According to the example in the first row of the table below, the location features of the parcel 339/9 reduce its value by 23.83%. This rate means 335.41 TRY depreciation. The compensation to be paid to the parcel owner is 1,407.52 TRY as a result of the official valuation. However, BOTAŞ adopted a proactive value increase method (objective value increase) and ignored all factors that caused value decrease/depreciation. Thus, 1,742.93 TRY expropriation compensation was paid to the owner instead of 1,407.52 TRY which is the full replacement cost without any depreciation.

Table 0-7 Examples of 20% objective increase in easement value

No	Province	District	Settlement	Parcel	Objective Value Decrease (%)	Easement payment	Value Depreciation (TRY)	Objective Value Increase Ratio (%)	Final easement payment amount
1	AKSARAY	MERKEZ	ALTINKAYA (YENİ KÖYÜ)	339/30	23,83	1.407,52	335,41	23,83	1.742,93
2	AKSARAY	MERKEZ	ALTINKAYA (YENİ KÖYÜ)	339/33	24,08	1.217,79	293,28	24,08	1.511,07
						503,69	0,00		503,69
3	AKSARAY	SULTANHANLI	MERKEZ	3082	23,55	2.933,64	690,93	23,55	3.624,57
4	AKSARAY	ORTAKÖY	FAKICIK	130/10	23,50	619,26	145,53	23,50	764,79

The number of parcels and PAPs that are the subject of these evaluations are presented in the table below. Detailed list of all parcels affected by second time expropriation are given in Appendix 6 along with the SeEP or SeCP calculations for owner/shareholders and users. Accordingly, SeEPs were paid to 2464 owners/shareholders for 378 parcels within the scope of VA and SeCPs were paid to 182 non-owner users (including users of public lands). Payment amounts are recorded in the implementation summaries in Appendix 1 and Appendix 2.

Table 0-8 Parcels allocated to permanent easement for the second time

Second time easement allocated;	PLs (RAP)	FWPL and ETL (Addendum 1)	Total
Number of private parcels	31	347	378
Number of public parcels	18	10	28
Number of owners/shareholders of private parcels	50	2414	2464
Number of non-owner users of private parcels and informal users of public parcels	12	170	182

It should be also noted here that some of the parcels affected cumulatively due to GSDP and GSEP did not have standing crops before construction as the users have already harvested their crops. Non-owner users of these parcels who have not received crop payments as they harvested their crops before the land was expropriated will be also identified through a retrospective survey which is proposed to be part of a separate LRP study further. Besides, PAPs whose total permanent easement (due to GSDP and GSEP) ratio on their lands is between 40-60% (high risk) or more than 60% (very high risk) will be included in LRP to define in-kind livelihood restoration measures through a survey. See Chapter 6 for more details about need of LRP.

4.2. Contract farmers

During the field study of RAP, it was determined that some farmers made contract farming agreements with the private sector companies in the region. Farmers have undergone certain commitments with these contracts with the companies, but also have been the beneficiaries of certain quotas. In case of failure of the contracts or failure of the farmer to deliver the product in quantity and quality specified in the contract, a loss of rights in terms of quota ownership will be experienced by the farmers. In such cases, the companies

may not sign a contract with the farmer the following year. The farmer may suffer from premium loss and may be fined for a few times the premium. In case of incomplete delivery, farmer may lose the quota defined in the agreement. This type of contract farming is related to sugar beet production. In RAP, 14 contract farmers were identified in the Project area. Within the scope of VA, it was determined that two more contract farmers were affected by the project and the total number was 16. Detailed list of contract farmer households are presented in Appendix 4.

Within the scope of VA, 11 contract farmers were interviewed and Project impacts on agricultural activity were examined. No contract farmer has encountered problems such as quota penalty or contract termination. The farmers interviewed declared that they either received help to achieve their quotas or purchased additional products to compete the crop amount that they could not cultivate due to Project activities. However, there were no official records of these expenses. The declared costs were well below the 6-month minimum wage. BOTAŞ developed another way to compensate these costs, which cannot be documented in any way. Additional crop payments have been paid to all contract farmers to correspond to the increase in yield in sugar beet. These payments are calculated by multiplying the affected parcel size and the value increase in the unit price of the crop. The sum of the additional crop payments paid in different amounts depending on the size of the affected lands is approximately 80,000 TRY.

According to EM of RAP, contract farmers will be paid 6-month TLS. 16 contracted farmers were paid 6-month TLS in the scope of VA study. This is in addition to the crop payment referred to in the previous paragraph.

Table 0-9 Summary numbers about contract farmers

	RAP	RAP Addendum	Total
Number of contract farmers identified	7	9	16
Number of contract farmers 6-month TLS paid	7	9	16 ⁹

⁹ 7 of them had already received 6-month TLS due to the multiple project component effect.

5. INDEPENDENT VULNERABILITIES

Some of the independent vulnerability cases (woman head of household, elderly and people with disabilities) were already identified in RAP and Addendum 1 studies. This data has been used as baseline and verified during Mukhtar and vulnerable interviews. New vulnerability cases were identified and added to this data. Also, some of the pre-identified cases were excluded as it was revealed out that some of these were incorrect or not suitable for the definition of vulnerability categories. The current numbers of independent vulnerability cases in these categories are presented in the table below. Except for one woman and one elderly individual, all vulnerable were reached and interviewed, and the effects of the project on their income sources were examined. Evaluations were summarized in Appendix 5 along with the entitlement details of 34 households.

Table 10 Number of Identified PAPs in Independent Vulnerability Categories

Category of AHs with vulnerabilities	Number of AHs (RAP)	Number of AHs (RAP Addendum)	Total	Number of entitled 1-month TLS
Number of AHs has woman head of household	2	7	9	9
Number of AHs has elderly member who need assistance	10	11	22	21 ¹⁰
Number of AHs has member with disabilities	1	2	3	3
TOTAL			34	33

Detailed interviews with these PAPs revealed out that PAPs with independent vulnerabilities did not experience livelihood or income losses due to GSEP. Although they have not experienced any livelihood losses due to Project, the EM of RAP specifies that “Additional income restoration measures may be also designed, including provision of employment in the Project.” Therefore, alternative income restoration measures were searched to support these PAPs and cash support for agricultural expenses (diesel and fertilizer) was proposed to be paid. The unit prices of diesel and fertilizer support per decare provided to farmers by the Ministry of Agriculture and Forestry in 2021 was taken as a basis to calculate the cash supports. Cash support was calculated with following formula; “Affected parcel area (da) x Unit price for support”. Cash support amounts calculated with this formula were found to be very low to cover agricultural expenses of PAPs as the expropriated area of PAPs' parcels are quite small. Consequently, BOTAŞ has decided to pay 1-month TLS to all vulnerable in these independent vulnerability categories (female head of household, elderly and disabled) that have no loss of income due to the Project to support their livelihoods. For vulnerable in these three categories who also have loss of income, BOTAŞ will pay them 1 month-TLS plus their loss of income which will be based on a household survey in further RAP Addendum studies.

5.1. To sum up, total of 34 vulnerable in these three categories were provided with 1 month TLS as an additional support and goodwill gesture of the Project. Details of these categories are provided in following paragraphs. Women, in particular female-headed households or land users

9 women head of households affected by the project were identified and listed in Appendix 5. As identified during the field study of RAP, women in project-affected settlements have lower level of knowledge about the Project rather than men. In the scope of VA, deficiencies in accessing information and GRM were also detected. Women who were found to have insufficient information within the scope of VA were informed by BOTAŞ by phone. **Error! Reference source not found.** Contractor CLO and Stakeholder Engagement Monitoring Consultant carried out engagement activities for women who could not be reached within the scope of VA (see Stakeholder Engagement and Labour sections of Q5 ESIA and RAP Monitoring Report).

RAP found out that, in some settlements, women could work in the Project if appropriate work, service and regular working hours were provided. 9 women identified as vulnerable individuals are engaged in agricultural activity and were not employed within the scope of the Project. However, local employment is provided to women within the scope of the project. According to the April Mmonthly M&E report ESIA and

¹⁰ One person is deceased.

RAP Monitoring Report, around 40 (half) of the 80-female employment (50%) are from local communities. According to worker survey conducted in the scope of VA study, the local employment rate is 30.8% in the Project. The rate of directly-PAPs in local employment is 6.5% (25 directly-PAPs, 360 indirectly-PAPs). Of the 25 directly-PAPs employed in the project, 22 are men and 3 are women. The directly-PAP women are employed in BİRMEK MAKİNA (1), ÖNDER TEMİZLİK (1) and İÇTAŞ (1).

5.2. Elderly (over 65 years old)

Individuals over the age of 65 continue their agricultural activities. Elderly individuals who needed help while continuing their daily practices or agricultural activities were examined within the scope of VA and 22 PAPs identified as listed in Appendix 5.

RAP stipulates that the Project Social Team of BOTAŞ will visit the households of the elderly and inform them about the Project, especially monitoring and evaluation procedures, and determine their needs. Elderly PAPs, who have incomplete or incorrect information about expropriation payments within the scope of VA, were called by BOTAŞ personnel by phone (due to Covid-19 conditions) and provided with necessary information.

5.3. People with disabilities

RAP defines the people with disabilities as potential vulnerable PAPs who may be encountered in the Project impact area and they may be more likely to have difficulties in access to information, raising their grievances or concerns, finding other jobs to sustain their livelihoods etc. As defined in RAP, the Project team will monitor these households closely during the monitoring process. In case of its occurrence, special assistance to these vulnerable people may be provided in a timely and appropriate manner. Within the scope of this VA, 3 disabled individuals were identified; however no income loss was detected due to their disadvantaged position.

5.4. Seasonal workers (including refugees)

According to RAP, the settlements located in the study area receive seasonal workers predominantly from the southern side of Turkey or Syria for harvesting or other agricultural work. The majority of the seasonal workers come from Hatay, Kilis, Şanlıurfa provinces of Turkey or from Syria to work between April and September, and the majority of these workers are Syrian refugees. Within the scope of the VA study conducted between November and April, direct contact with seasonal agricultural workers could not be established. Instead, interviews were held with mukhtars and ESIA and RAP Monitoring Reports were examined.

During the interviews with Mukhtars conducted for VA, the Project' impacts on seasonal agricultural workers were re-questioned. When asked whether there are seasonal agricultural workers in the settlement, a positive response was received from 9 mukhtars¹¹. It was learned that 25 to 600 seasonal agricultural workers could come to a settlement within a year.

It was also questioned whether there were refugee / migrant groups among seasonal agricultural workers. It was learned that foreign seasonal agricultural workers were working in three villages¹². However, no loss of income was stated among this group.

During the interviews with Mukhtars, the potential impacts on their tent settlements and livelihood conditions of seasonal workers had been specifically questioned. During the interviews, it was revealed that the areas where the tents were established had no connection with the expropriation areas where the construction activities of the Project will be carried out.

RAP states that "... with the commencement of agricultural season and the arrival of seasonal workers in the region, informative consultations for seasonal workers will be provided by the Public Relations Unit of the Project. During these consultations, the Project team will work to understand how seasonal workers will be

¹¹ Baymış, Boğazköy, Gazi, Hürriyet, Merkez/Karşıyaka, Merkez/Kurtuluş, Pınarbaşı, Yenikent/İstiklal and Yeşiltepe/Zafer

¹² Gazi, Saksenuşağı, Yenikent/İstiklal

affected from their own perspectives”. Despite these, RAP has repeated that the project was not expected to have a negative impact on seasonal workers. No activity for seasonal agricultural workers has yet been carried out within the scope of the Project (for requirement see Table 0-11).

Consultations conducted within the scope of this research showed that the works of seasonal workers did not decrease due to the project, on the contrary, labor costs for farmers increased in general. The Mukhtars of three villages stated that the lands where seasonal agricultural workers previously worked were damaged, but they compensated for this loss by working in other lands.

There has been no change due to the project in the shelter areas, water and electricity facilities of seasonal agricultural workers. The only overlap with the project activities regarding the shelter areas of seasonal workers is the temporary use of the camp site used by seasonal workers at the entrance of Yeşiltepe district as a pipe stock area. However, no impact has occurred as the pipes were removed before the worker season has started.

Seasonal workers are functioning in the entire area, Konya and Aksaray Region. Most of them are temporary, they are using their mobile caravan type vehicles for accommodation. They do not have any fixed shelter area nor do they prefer to, as they are mobile and flexible for any work opportunity. They tend to live together for a better job breakdown and sharing capacity.

Table 0-11 Requirement for seasonal workers as vulnerable group of the Project

Issue	Target group	Actions taken	Further action need
According to RAP informative consultations for seasonal workers will be provided by the Public Relations Unit of the Project. This activity has not yet been carried out. Seasonal workers will begin to arrive in the coming months. CLO of Contractor will plan an information activity.	Seasonal workers	No action taken	Informative consultations for seasonal workers in Summer 2022 by Contractor

Among the people have independent vulnerabilities, there were people who declared that they could not reach even though they tried to use the GRM or who have not received any results yet. These persons did not declare any vulnerability related reasons. However, vulnerable groups are likely to have difficulties in accessing engagement opportunities. Some PAPs that were interviewed also did not have enough information about GRM. For this reason, information activities were increased in the Q4 and Q5 periods. Thanks to these activities, people who cannot be reached within the scope of VA are expected to establish a link with the Project. Taken actions and additional action requirements regarding the subject are presented in the table below. Apart from these, ESIA and RAP Monitoring Consultants provided training for officials of İÇTAŞ and sub-contractors on September 27, 2021, including international social standards of the Project and information on GRM and CLQs.

Table 0-12 Further investigation and action to be developed GRM

Issue	Target group	Actions taken	Further action need
PAPs say that they have complaints that they raised to the authorities but could not get results, and GRM records on these issues cannot be found.	All PAPs	Online system started to be used for better operation and monitoring of GRM. Information activities for PAPs were increased. (See Stakeholder Management section of Q5 ESIA and RAP M&E report).	All complaints from PAPs will be recorded in GRM. A GRM registration number will be provided to the complainant. GLAC will be redistributed to villages.
Although some PAPs they tried to use the GRM, they could not reach the authorities.	All PAPs	Online system started to be used for better operation and monitoring of GRM. Information activities for PAPs were increased. CLOs provided information on GRM in all their interviews. (See Stakeholder Management section of Q5 ESIA and RAP M&E report).	Informative letters about more than one channel where complaints will be received will be posted in public spaces in settlements. This letter will contain information that all complaints must be recorded and the complaint number must be requested. Muhtars will be informed about how to record complaints from the public one by

		report).	one. This application has been started and continues. GRM and CLO contact information will be disseminated by CLOs of BOTAS and ICTAS.
Some PAPs complained about not being able to find an official from BOTAS who deals with their problems.	All PAPs	Information activities for PAPs were increased.	The CLO assigned on behalf of BOTAS should be known and accessible by PAPs and all other stakeholders. For this purpose, GRM and CLO contact information will be disseminated by CLOs of BOTAS and ICTAS.
PAPs cannot use GRM because they do not believe they can get results.	All PAPs	Online system started to be used for better operation and monitoring of GRM.	The public's trust in BOTAS will increase with the timely resolution of the problems, the provision of necessary information and the availability of CLOs. Efforts will be made to increase the rate of complaints closed within 30 days. Subcontractor officials will be informed about GRM.

6. IMPACT LEVEL DIFFERENCES BETWEEN PAPs & LIVELIHOOD RESTORATION PLAN REQUIREMENT

Entitlements in EM of the RAP were provided to the PAPs within the scope of VA. Compensations based on the commitments in RAP were paid to certain vulnerable groups in certain amounts. However, according to VA field study, the vulnerable groups contain differences in terms of the level of impact. Additional livelihood restoration measures need to be taken for PAPs who are more affected by the Project than others by preparing an LRP that includes all PAPs, not just vulnerable groups.

There could be PAPs whose livelihood sources are affected but who are not in vulnerable categories of the Project. These people are not in the scope of VA study. Therefore, a more comprehensive study will be carried out for LRP.

The proposed livelihood restoration plan will be a separate document to cover up and engage directly affected-PAP families whose lands affected by land acquisition of the Project as well as indirectly affected-PAP families / communities who lives or works in Project area (Communities in PASSs).

To date, cash payments are made (and will be made in the future as necessary) as per the Entitlement Matrix to fulfil requirements for national and international standards. In addition to these payments, secondary crop and secondary easement payments as well as payments multiple impacts have also been made to the PAPs.

Non-cash measures, that will be part of the LRP, will include measures that will be taken by BOTAS but also by other institutions. BOTAS has now about to finalise a protocol with TKDK for engagement.

In that respect, considering the land use, agricultural activities, livestock activities as well as disrupted business activities (if any) and perceptions of the villagers, the social household and community-level surveys¹³ conducted for each RAP instrument will be re-visited for appropriate livelihood measures. Also, input from GRM will be taken into account while assessing the conditions. Although the PAPs that are subject to land acquisition are compensated at full replacement cost, methodology for the the ones whose are losing more than 20% of their lands ; households headed by elderly, women and/or persons with disabilities; informal users; users who did not receive crop payments as they harvested their crops before construction activities commenced; persons who have loss of income due to business interruption (seasonal workers), all income based on land, those who are impacted more than once will be part of the LRP.

These individual and community level measures may contain (but not limited to), agricultural improvements for watering, desalination of land, alternative crop types in accordance with climate change, training to build awareness on climate change, making use of renewable energy, acquiring grants or credits from external sources (EU, WB, etc.) for alternative business development opportunities; tourism, hiking camping facilities and arrangements, organising festivals for traditional goods or geographically marked entities (Aksaray Malaklısı, etc.), e-trade capacity development for youth, facilities for animal husbandary, animal protection, washing units and such. All PAPs will be supported to participate in vocational courses held by governmental agencies (ie. Turkish Employment Agency courses, Public Education Center courses, municipality courses and other local agencies providing such courses.

The LRP is expected to be ready by September-2022. Implementation will start immediately after approval by the Bank start and continue till the end of Project.

¹³ - Full census household survey (RAP and Addendum 2) and community level survey data at UGS areas,
 - Sample-based Addendum 2 household and community level survey and full census Social Audit household survey data in 154 kV ETL areas,
 - RAP and Addendum 1 household survey data and community-level survey data based on sampling in Pipeline and 34.5 kV ETL areas,
 - Vulnerability Assessment vulnerable PAP and Muhtar surveys data,

Table 0-13 Further actions for impact level differences between PAPs

Issue	Target	Actions taken	Further action need
There are impact level differences between PAPs. Some PAPs are more affected by the Project than others.	Additional livelihood restoration measures need to be taken for PAPs more affected by the Project than others.	Impact level differences between vulnerable groups have been measured in the scope of VA survey.	Impact level differences between all PAPs will be measured and will prepare an LRP for PAPs who are more affected by the Project than others.
The project may also have various impacts on indirectly-PAPs (communities in PASs) whose lands are not affected by the project's land acquisition but who live in PASs	Mitigate indirectly impacts and have good relationships with indirectly-PAPs.	No	Indirect-PAPs will be included in LRP and individual/community level support will be provided.