



# İSTANBUL NORTH RAIL CROSSING PROJECT (INRAIL)

## CULTURAL HERITAGE MANAGEMENT PLAN



**İSTANBUL NORTH RAIL CROSSING PROJECT (INRAIL)  
CULTURAL HERITAGE MANAGEMENT PLAN**

**Document Number**

**INRAIL-REG-REP-CINAR-25-01**

| Rev   | Status | Date       | Status Description     | Issued by      | Checked by      | Approved by      |
|-------|--------|------------|------------------------|----------------|-----------------|------------------|
| Rev 0 | IDC    | 11.06.2025 | Inter-Discipline Check | Serkan Akdemir | Haydar Uğur Dağ | Hasan Melih Aral |
|       |        |            |                        |                |                 |                  |
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## LIST of ABBREVIATIONS

|                                    |  |
|------------------------------------|--|
| <b>CFP</b>                         | Chance Find Procedure  |
| <b>CIFA</b>                        | Chartered Institute for Archaeologists                           |
| <b>EBRD</b>                        | European Bank for Reconstruction and Development                 |
| <b>EHS</b>                         | Environmental, Health, and Safety                                |
| <b>GIIP</b>                        | Good International Industry Practices                            |
| <b>ICH</b>                         | Intangible Cultural Heritage                                     |
| <b>ICOMOS</b>                      | International Council of Monuments and Sites                     |
| <b>IFC</b>                         | International Finance Corporation                                |
| <b>IFIs</b>                        | International Finance Institutions                               |
| <b>KPI</b>                         | Key Performance Indicator  |
| <b>OHS</b>                         | Occupational Health and Safety                                   |
| <b>Plan or CHMP</b>                | Cultural Heritage Management Plan                                |
| <b>Project</b>                     | İstanbul North Rail Crossing Project (INRAIL)                    |
| <b>PRs</b>                         | Performance Requirements   |
| <b>PSS</b>                         | Performance Standards  |
| <b>UNESCO</b>                      | United Nations Educational, Scientific and Cultural Organization |
| <b>Project Owner or Contractor</b> | İstanbul North Rail Crossing Project (INRAIL) Management         |

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## 1. INTRODUCTION

This document has been designed by İstanbul North Rail Crossing Project (INRAIL) Management in order to direct the CONTRACTOR to execute their activities in relation to cultural heritage. This plan (including Chance Find Procedure (CFP) study has been conducted in line with the local law, legislation, EBRD PR8 and IFC PS8.

Considering the cultural heritage potential of the project location, this Cultural Heritage Management Plan (CHMP) aims to propose a set of actions to preserve the cultural heritage within the scope of the İstanbul North Rail Crossing Project (INRAIL) and to minimize possible adverse effects of the project (Figure 1-1).

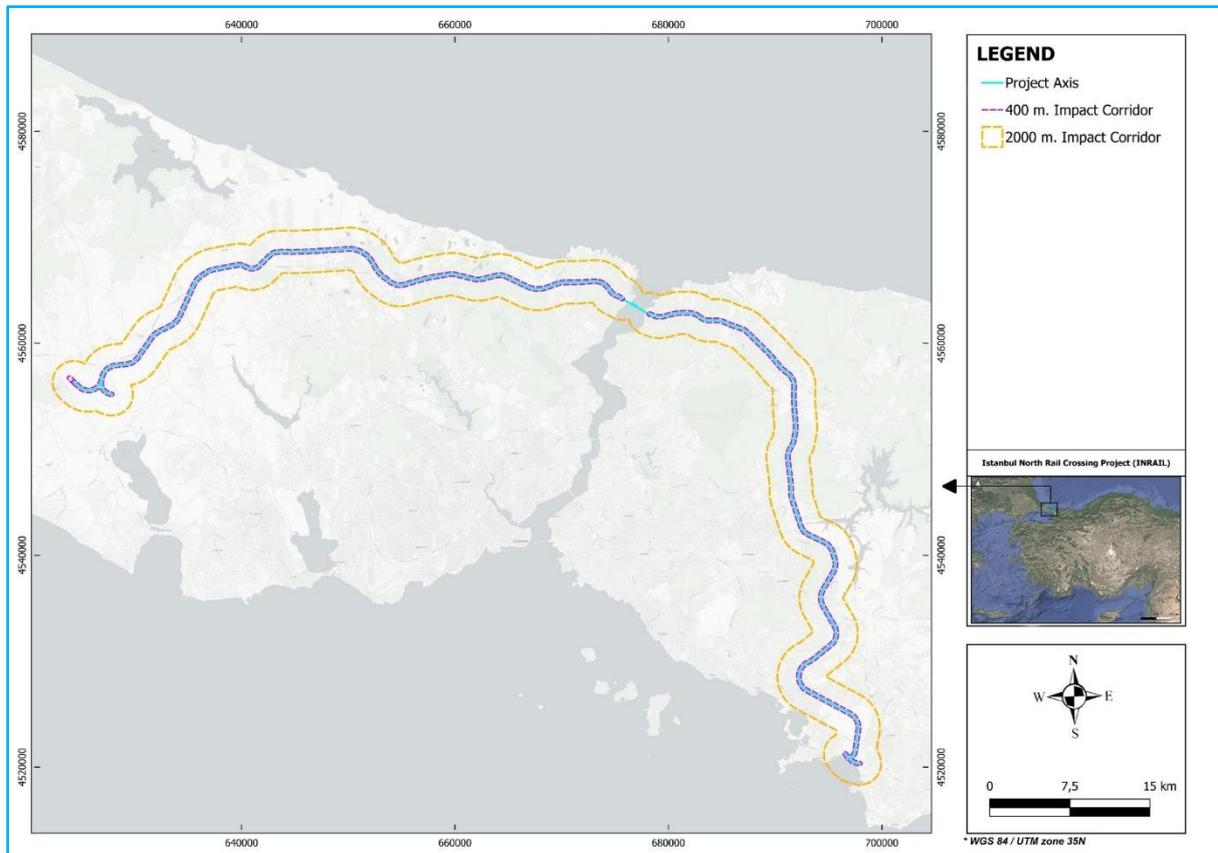


Figure 1-1: İstanbul North Rail Crossing Project (INRAIL) Route

The impact mitigation on the potential cultural heritage sites/elements within the project impact area is possible by developing and implementing a management plan. There are crucial natural resources (such as water resources, and proximity to agricultural areas) suitable for human settlement around the geographical area where the project is located. On the other hand, there may be tangible cultural heritage assets (chance finds) that have been buried in the geographical area of the Project or its close vicinity and whose existence will be determined by advanced research techniques or that will be unearthed during the construction works. Therefore, the construction activities within the scope of the project should be conducted in compliance with the proposed management plan.

The walkover survey method was carried out within the Project route to understand whether any tangible cultural heritage assets existed between 22<sup>nd</sup> and 25<sup>th</sup> of May 2025. Fifty-one (51) registered and unregistered cultural heritage sites/assets were encountered during the desktop studies and walkover survey for the Project route and 400 meters impact corridor. The potential Project impacts, proposed mitigation measures and residual impact significance are summarised in Table 1-1.

Table 1-1: Impact Significance and Mitigation Measures regarding Cultural Heritage

| No | Attribute Name                   | Potential Impact / Risk   | Project Phases                          | Impact Magnitude |                       |            |               |          |                      | Sensitivity/<br>Value of<br>Resource/<br>Receptor | Impact<br>Significance<br>(prior to<br>mitigation) | Proposed Mitigation Measures  | Residual<br>Impact<br>Significance <sup>1</sup> |
|----|----------------------------------|---|---|------------------|-----------------------|------------|---------------|----------|----------------------|---|--|---|---|
|    |                                  |   |   | Extent           | Reversibility         | Duration   | Frequency     | Severity | Overall<br>Magnitude |   |  |   |   |
| 1  | Çatalca Train Station Structures | Çatalca Train Station Structures is a registered cultural heritage asset which is located within the 400 meters impact corridor. The registered cultural heritage asset is approximately 68 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project. | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible           | High  | Minor  | <p>The following steps about registered cultural heritage asset should be conducted during the Project lifespan:</p> <ul style="list-style-type: none"> <li>Not allowing any construction / physical intervention before the permission of the Istanbul No.1 Regional Council for the Conservation of Cultural Property.</li> <li>The identified location should be marked as a registered cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the registered cultural heritage asset and its protection buffer zone.</li> <li>The construction activities should be avoided from the identified cultural heritage site during the Project lifespan.</li> </ul>  | Negligible                                      |
| 2  | Military Bunker_1                | Military Bunker 1 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 159 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project.                               | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible           | Medium  | Negligible   | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                      |
| 3  | Military Bunker_2                | Military Bunker 2 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 69 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project.                                | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible           | Medium  | Negligible   | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                      |
| 4  | Military Bunker_3                | Military Bunker 3 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 169 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project.                               | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible           | Medium  | Negligible   | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> </ul>  | Negligible                                      |

<sup>1</sup> If the recommended mitigation measures are taken into consideration and implemented, the "residual impact" will occur as negligible.

| No | Attribute Name    | Potential Impact / Risk  | Project Phases                          | Impact Magnitude |                                    |            |               |          |                   | Sensitivity/ Value of Resource/ Receptor | Impact Significance (prior to mitigation) | Proposed Mitigation Measures  | Residual Impact Significance <sup>1</sup> |
|----|-------------------|--|---|------------------|------------------------------------|------------|---------------|----------|-------------------|--|---|---|---|
|    |                   |  |   | Extent           | Reversibility                      | Duration   | Frequency     | Severity | Overall Magnitude |  |   |   |   |
|    |                   |  |   |                  |                                    |            |               |          |                   |  |   | <ul style="list-style-type: none"> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul>   |   |
| 5  | Military Bunker_4 | Military Bunker 4 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 46 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project.         | Land Preparation and Construction Phase | Restricted       | Short-term reversible              | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul>   | Negligible                                |
| 6  | Military Bunker_5 | Military Bunker 5 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 59 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project.         | Land Preparation and Construction Phase | Restricted       | Short-term reversible              | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul>   | Negligible                                |
| 7  | Military Bunker_6 | Military Bunker 6 is an unregistered cultural heritage asset which is located within the Project construction corridor. Possible, physical and visual irreversible adverse effect on an unregistered cultural heritage asset. Physical impact is expected to occur due to the Project construction works (excavation) to be carried out. | Land Preparation and Construction Phase | Restricted       | Irreversible/ Long-term reversible | Long-term  | One-off/rare  | Moderate | Medium            | Medium                                   | Moderate                                  | <p>The military bunker is located within the Project construction corridor. Therefore, the military bunker may be physically at risk from construction activities. Due to the cultural heritage sensitivity of the area, construction area should be avoided from the identified site border.</p> <p>Additionally, the following steps regarding cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>An official notification to begin the legal protection assessment process should be made by the project to the Istanbul No.1 Regional Council for the Conservation of Cultural Property.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned and implemented within the identified area before the official decision, which will be released by the Istanbul No.1 Regional Council for the Conservation of Cultural Property.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily monitoring is necessary.</li> </ul> | Negligible                                |

| No | Attribute Name           | Potential Impact / Risk   | Project Phases                          | Impact Magnitude |                                    |            |               |          |                      | Sensitivity/<br>Value of<br>Resource/<br>Receptor | Impact<br>Significance<br>(prior to<br>mitigation) | Proposed Mitigation Measures  | Residual<br>Impact<br>Significance <sup>1</sup> |
|----|--------------------------|---|---|------------------|------------------------------------|------------|---------------|----------|----------------------|---|--|---|---|
|    |                          |   |   | Extent           | Reversibility                      | Duration   | Frequency     | Severity | Overall<br>Magnitude |   |  |   |   |
|    |                          |   |   |                  |                                    |            |               |          |                      |   |  | <ul style="list-style-type: none"> <li>In case of a project revision to avoid the irreversible effects of the project construction activities on the cultural heritage asset is not possible, the necessary detailed documentation study (such as detailed measured drawings, photographic catalogues, and other relevant records) should be completed, following documentation, the heritage asset (the military bunker) should be carefully dismantled and relocated to an appropriate site (such as a heritage park or another location to be identified by the relevant Council) for reconstruction and interpretation purposes.</li> </ul>   |   |
| 8  | Military Bunker_7        | Military Bunker 7 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 142 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project. | Land Preparation and Construction Phase | Restricted       | Short-term reversible              | Short-term | One-off/ rare | Minimal  | Negligible           | Medium  | Negligible   | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul>   | Negligible                                      |
| 9  | Hasanbey Flat Settlement | The unregistered archaeological site (Hasanbey Flat Settlement) is located within the Project construction corridor. Possible, physical and visual irreversible adverse effect on the unregistered archaeological site is expected to occur due to the Project construction works (filling and bridge).                           | Land Preparation and Construction Phase | Restricted       | Irreversible/ Long-term reversible | Long-term  | One-off/rare  | Moderate | Medium               | Medium  | Moderate   | <p>The archaeological site is located within the Project construction corridor. Therefore, the archaeological site may be at physical risk due to the construction activities planned for the project. Due to the archaeological sensitivity of the area, the construction activities should be avoided within the identified site boundary. Additionally, the following steps regarding cultural heritage assets should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>An official notification to begin the legal protection assessment process should be made by the project to the Istanbul No.1 Regional Council for the Conservation of Cultural Property.</li> <li>The identified location should be marked as an archaeological sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned and implemented within the identified area before the official decision, which will be released by the Istanbul No.1 Regional Council for the Conservation of Cultural Property.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> <li>The council may request any further investigation to define the archaeological potential of the areas (such as test pit excavation and/or salvage excavation) before the official decision. Hence, the project management can consider project revision (such as route change) to avoid the irreversible effects of the construction activities on the archaeological heritage asset(s). If it is not possible, a further investigation study (salvage/test excavation) to be able to request by the council should be implemented, and a detailed documentation study should be conducted for the site.</li> </ul> | Negligible                                      |

| No | Attribute Name              | Potential Impact / Risk   | Project Phases                          | Impact Magnitude |                       |            |               |          |                   | Sensitivity/ Value of Resource/ Receptor | Impact Significance (prior to mitigation) | Proposed Mitigation Measures  | Residual Impact Significance <sup>1</sup> |
|----|-----------------------------|---|---|------------------|-----------------------|------------|---------------|----------|-------------------|--|---|---|---|
|    |                             |   |   | Extent           | Reversibility         | Duration   | Frequency     | Severity | Overall Magnitude |  |   |   |   |
| 11 | Kolviran Military Structure | Kolviran Military Structure is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military structure is approximately 13 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project. | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                |
| 12 | Kolviran Military Ditch     | Kolviran Military Ditch is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military ditch is approximately 82 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project.         | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified historical asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul>        | Negligible                                |
| 13 | Kolviran Bridge             | Kolviran Bridge is an unregistered cultural heritage asset (from Roman Period) which is located within the 400 meters impact corridor. The bridge is approximately 165 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project.    | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                |
| 14 | Military Bunker_9           | Military Bunker 9 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 84 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project.              | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> </ul>  | Negligible                                |

| No | Attribute Name     | Potential Impact / Risk   | Project Phases                          | Impact Magnitude |                                    |            |               |          |                   | Sensitivity/ Value of Resource/ Receptor | Impact Significance (prior to mitigation) | Proposed Mitigation Measures   | Residual Impact Significance <sup>1</sup> |
|----|--------------------|---|---|------------------|------------------------------------|------------|---------------|----------|-------------------|--|---|--|---|
|    |                    |   |   | Extent           | Reversibility                      | Duration   | Frequency     | Severity | Overall Magnitude |  |   |  |   |
|    |                    |   |   |                  |                                    |            |               |          |                   |  |   | <ul style="list-style-type: none"> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul>  |   |
| 15 | Military Bunker_10 | Military Bunker 10 is an unregistered cultural heritage asset which is located within the Project construction corridor. Possible, physical and visual irreversible adverse effect on the cultural heritage asset due to the Project construction works (excavation) to be carried out.   | Land Preparation and Construction Phase | Restricted       | Irreversible/ Long-term reversible | Long-term  | One-off/rare  | Moderate | Medium            | Medium                                   | Moderate                                  | <p>The military bunker is located within the Project construction corridor. Therefore, the military bunker may be physically at risk from construction activities. Due to the cultural heritage sensitivity of the area, construction area should be avoided from the identified site border.</p> <p>Additionally, the following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>An official notification to begin the legal protection assessment process should be made by the project to the Istanbul No.1 Regional Council for the Conservation of Cultural Property.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned and implemented within the identified area before the official decision, which will be released by the Istanbul No.1 Regional Council for the Conservation of Cultural Property.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily monitoring is necessary.</li> <li>In case of a project revision to avoid the irreversible effects of the project construction activities on the cultural heritage asset is not possible, the necessary detailed documentation study (such as detailed measured drawings, photographic catalogues, and other relevant records) should be completed, following documentation, the heritage asset (the military bunker) should be carefully dismantled and relocated to an appropriate site (such as a heritage park or another location to be identified by the relevant Council) for reconstruction and interpretation purposes.</li> </ul> | Negligible                                |
| 16 | Military Bunker_11 | Military Bunker 11 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 1 meter away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project. | Land Preparation and Construction Phase | Restricted       | Short-term reversible              | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul>  | Negligible                                |
| 17 | Military Bunker_12 | Military Bunker 12 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 18 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its  | Land Preparation and Construction Phase | Restricted       | Short-term reversible              | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> </ul>  | Negligible                                |

| No | Attribute Name              | Potential Impact / Risk  | Project Phases                          | Impact Magnitude |                       |            |               |          |                      | Sensitivity/<br>Value of<br>Resource/<br>Receptor | Impact<br>Significance<br>(prior to<br>mitigation) | Proposed Mitigation Measures  | Residual<br>Impact<br>Significance <sup>1</sup> |
|----|-----------------------------|--|---|------------------|-----------------------|------------|---------------|----------|----------------------|---|--|---|---|
|    |                             |  |   | Extent           | Reversibility         | Duration   | Frequency     | Severity | Overall<br>Magnitude |   |  |   |   |
|    |                             | surrounding landscape could be visually impacted by the project.   |   |                  |                       |            |               |          |                      |   |  | <ul style="list-style-type: none"> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul>  |   |
| 18 | Military Bunker_13          | Military Bunker 13 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 38 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project.            | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible           | Medium  | Negligible   | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                      |
| 19 | Örenbayırı Slope Settlement | Örenbayırı Slope Settlement is an unregistered archaeological site located within the 400 meters impact corridor. The unregistered archaeological site is approximately 6 meters away from the Project construction corridor. Therefore, the cultural heritage site and its surrounding landscape could be visually impacted by the project. | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible           | Medium  | Negligible   | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                      |
| 20 | Military Bunker_14          | Military Bunker 14 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 124 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project.           | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible           | Medium  | Negligible   | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                      |

| No | Attribute Name     | Potential Impact / Risk  | Project Phases                          | Impact Magnitude |                       |            |               |          |                   | Sensitivity/ Value of Resource/ Receptor | Impact Significance (prior to mitigation) | Proposed Mitigation Measures  | Residual Impact Significance <sup>1</sup> |
|----|--------------------|--|---|------------------|-----------------------|------------|---------------|----------|-------------------|--|---|---|---|
|    |                    |  |   | Extent           | Reversibility         | Duration   | Frequency     | Severity | Overall Magnitude |  |   |   |   |
| 21 | Military Bunker_15 | Military Bunker 15 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 127 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project. | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                |
| 22 | Military Bunker_16 | Military Bunker 16 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 175 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project. | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                |
| 23 | Military Bunker_17 | Military Bunker 17 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 134 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project. | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                |
| 24 | Military Bunker_18 | Military Bunker 18 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 93 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project.  | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> </ul>  | Negligible                                |

| No | Attribute Name                  | Potential Impact / Risk   | Project Phases                          | Impact Magnitude |                       |            |               |          |                   | Sensitivity/ Value of Resource/ Receptor | Impact Significance (prior to mitigation) | Proposed Mitigation Measures  | Residual Impact Significance <sup>1</sup> |
|----|---------------------------------|---|---|------------------|-----------------------|------------|---------------|----------|-------------------|--|---|---|---|
|    |                                 |   |   | Extent           | Reversibility         | Duration   | Frequency     | Severity | Overall Magnitude |  |   |   |   |
|    |                                 |   |   |                  |                       |            |               |          |                   |  |   | <ul style="list-style-type: none"> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul>   |   |
| 25 | Akpınarçiftliği Military Bridge | Akpınarçiftliği Military Bridge is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The bridge is approximately 10 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project. | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                |
| 26 | Military Bunker_19              | Military Bunker 19 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 199 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project.    | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                |
| 27 | Military Bunker_20              | Military Bunker 20 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 180 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project.    | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                |

| No | Attribute Name     | Potential Impact / Risk  | Project Phases                          | Impact Magnitude |                       |            |               |          |                   | Sensitivity/ Value of Resource/ Receptor | Impact Significance (prior to mitigation) | Proposed Mitigation Measures  | Residual Impact Significance <sup>1</sup> |
|----|--------------------|--|---|------------------|-----------------------|------------|---------------|----------|-------------------|--|---|---|---|
|    |                    |  |   | Extent           | Reversibility         | Duration   | Frequency     | Severity | Overall Magnitude |  |   |   |   |
| 28 | Military Bunker_21 | Military Bunker 21 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 124 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project. | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                |
| 29 | Military Bunker_22 | Military Bunker 22 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 180 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project. | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                |
| 30 | Military Bunker_23 | Military Bunker 23 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 97 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project.  | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                |
| 31 | Military Bunker_24 | Military Bunker 24 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 65 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project.  | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> </ul>  | Negligible                                |

| No | Attribute Name     | Potential Impact / Risk  | Project Phases                          | Impact Magnitude |                       |            |               |          |                   | Sensitivity/ Value of Resource/ Receptor | Impact Significance (prior to mitigation) | Proposed Mitigation Measures  | Residual Impact Significance <sup>1</sup> |
|----|--------------------|--|---|------------------|-----------------------|------------|---------------|----------|-------------------|--|---|---|---|
|    |                    |  |   | Extent           | Reversibility         | Duration   | Frequency     | Severity | Overall Magnitude |  |   |   |   |
|    |                    |  |   |                  |                       |            |               |          |                   |  |   | <ul style="list-style-type: none"> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul>   |   |
| 32 | Military Bunker_25 | Military Bunker 25 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 45 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project.  | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                |
| 33 | Military Bunker_26 | Military Bunker 26 is an unregistered cultural heritage asset. According to the project alignments, the military bunker is on the project construction corridor. However, a tunnel will be constructed in this section of the project, and the military bunker will be located above the tunnel. Therefore, any physical effect derived from the construction activities is not expected. On the other hand, the vibration caused impacts of the project may occur during the tunnel construction activities (blasting etc.). These impacts can affect the military bunker in the long term. | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                |
| 34 | Military Bunker_27 | Military Bunker 27 is an unregistered cultural heritage asset. According to the project alignments, the military bunker is on the project construction corridor. However, a tunnel will be constructed in this section of the project, and the military bunker will be located above the tunnel. Therefore, any physical effect derived from the construction activities is not expected. On the other hand, the vibration caused impacts of the project may occur during the tunnel construction activities (blasting etc.). These impacts can affect the military bunker in the long term. | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a historically sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul>      | Negligible                                |

| No | Attribute Name     | Potential Impact / Risk  | Project Phases                          | Impact Magnitude |                       |            |               |          |                   | Sensitivity/ Value of Resource/ Receptor | Impact Significance (prior to mitigation) | Proposed Mitigation Measures  | Residual Impact Significance <sup>1</sup> |
|----|--------------------|--|---|------------------|-----------------------|------------|---------------|----------|-------------------|--|---|---|---|
|    |                    |  |   | Extent           | Reversibility         | Duration   | Frequency     | Severity | Overall Magnitude |  |   |   |   |
| 35 | Military Bunker_28 | Military Bunker 28 is an unregistered cultural heritage asset. According to the project alignments, the military bunker is on the project construction corridor. However, a tunnel will be constructed in this section of the project, and the military bunker will be located above the tunnel. Therefore, any physical effect derived from the construction activities is not expected. On the other hand, the vibration caused impacts of the project may occur during the tunnel construction activities (blasting etc.). These impacts can affect the military bunker in the long term. | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                |
| 36 | Military Bunker_29 | Military Bunker 29 is an unregistered cultural heritage asset. According to the project alignments, the military bunker is on the project construction corridor. However, a tunnel will be constructed in this section of the project, and the military bunker will be located above the tunnel. Therefore, any physical effect derived from the construction activities is not expected. On the other hand, the vibration caused impacts of the project may occur during the tunnel construction activities (blasting etc.). These impacts can affect the military bunker in the long term. | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                |
| 37 | Military Bunker_30 | Military Bunker 30 is an unregistered cultural heritage asset which is located within the 400 meters Impact Corridor. The military bunker is approximately 136 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project.   | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                |
| 38 | Military Bunker_31 | Military Bunker 31 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The unregistered Military Bunker is approximately 3 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project.  | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> </ul>  | Negligible                                |

| No | Attribute Name     | Potential Impact / Risk   | Project Phases                          | Impact Magnitude |                       |            |               |          |                   | Sensitivity/ Value of Resource/ Receptor | Impact Significance (prior to mitigation) | Proposed Mitigation Measures  | Residual Impact Significance <sup>1</sup> |
|----|--------------------|---|---|------------------|-----------------------|------------|---------------|----------|-------------------|--|---|---|---|
|    |                    |   |   | Extent           | Reversibility         | Duration   | Frequency     | Severity | Overall Magnitude |  |   |   |   |
|    |                    |   |   |                  |                       |            |               |          |                   |  |   | <ul style="list-style-type: none"> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul>   |   |
| 39 | Military Bunker_32 | Military Bunker 32 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 88 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project. | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                |
| 40 | Military Bunker_33 | Military Bunker 33 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 46 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project. | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                |
| 41 | Military Bunker_34 | Military Bunker 34 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 65 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project. | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                |
| 42 | Military Bunker_35 | Military Bunker 35 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 102  | Land Preparation and                    | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p>  | Negligible                                |

| No | Attribute Name     | Potential Impact / Risk  | Project Phases                          | Impact Magnitude |                       |            |               |          |                      | Sensitivity/<br>Value of<br>Resource/<br>Receptor | Impact<br>Significance<br>(prior to<br>mitigation) | Proposed Mitigation Measures  | Residual<br>Impact<br>Significance <sup>1</sup> |
|----|--------------------|--|---|------------------|-----------------------|------------|---------------|----------|----------------------|---|--|---|---|
|    |                    |  |   | Extent           | Reversibility         | Duration   | Frequency     | Severity | Overall<br>Magnitude |   |  |   |   |
|    |                    | meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project.  | Construction Phase                      |                  |                       |            |               |          |                      |   |  | <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul>  |   |
| 43 | Military Bunker_36 | Military Bunker 36 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 57 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project.  | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible           | Medium  | Negligible   | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                      |
| 44 | Military Bunker_37 | Military Bunker 37 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 125 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project. | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible           | Medium  | Negligible   | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul> | Negligible                                      |
| 45 | Military Bunker_38 | Military Bunker 38 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 108 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project. | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible           | Medium  | Negligible   | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> </ul>  | Negligible                                      |

| No | Attribute Name             | Potential Impact / Risk  | Project Phases                          | Impact Magnitude |                       |            |               |          |                   | Sensitivity/ Value of Resource/ Receptor | Impact Significance (prior to mitigation) | Proposed Mitigation Measures   | Residual Impact Significance <sup>1</sup> |
|----|----------------------------|--|---|------------------|-----------------------|------------|---------------|----------|-------------------|--|---|--|---|
|    |                            |  |   | Extent           | Reversibility         | Duration   | Frequency     | Severity | Overall Magnitude |  |   |  |   |
|    |                            |  |   |                  |                       |            |               |          |                   |  |   | <ul style="list-style-type: none"> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul>  |   |
| 46 | Military Bunker_39         | Military Bunker 39 is an unregistered cultural heritage asset which is located within the 400 meters impact corridor. The military bunker is approximately 98 meters away from the Project construction corridor. Therefore, the cultural heritage asset and its surrounding landscape could be visually impacted by the project.  | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul>            | Negligible                                |
| 47 | Kurtdere Slope Settlement  | Kurtdere Slope Settlement is an unregistered archaeological site which is located within the 400 meters impact corridor. The unregistered archaeological site is approximately 75 meters away from the Project construction corridor. Therefore, the cultural heritage site and its surrounding landscape could be visually impacted by the project.   | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | Medium                                   | Negligible                                | <p>The following steps about cultural heritage asset should be conducted before the construction activities:</p> <ul style="list-style-type: none"> <li>Official notification to begin the legal protection assessment process should be made by the project to the Istanbul Regional Council for the Conservation of Cultural Property 1.</li> <li>The identified location should be marked as a cultural heritage sensitive area on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the identified area.</li> <li>The construction activities should be avoided from the identified cultural heritage asset during the Project lifespan.</li> <li>If any ground-disturbing activities are to be carried out around the identified sensitive area borders, daily archaeological monitoring is necessary.</li> </ul>            | Negligible                                |
| 48 | Roman Waterways (Aqueduct) | Roman Waterways (Aqueduct) is a registered cultural heritage asset. According to the project alignments, the waterway is on the project construction corridor. However, a tunnel will be constructed in this section of the project, and the waterway will be located above the tunnel. Therefore, any physical effect derived from the construction activities is not expected. On the other hand, the vibration caused impacts of the project may occur during the tunnel construction activities (blasting etc.). These impacts can affect the waterway in the long term. | Land Preparation and Construction Phase | Restricted       | Short-term reversible | Short-term | One-off/ rare | Minimal  | Negligible        | High                                     | Minor                                     | <p>The following steps about registered cultural heritage asset should be conducted during the Project lifespan:</p> <ul style="list-style-type: none"> <li>Not allowing any construction / physical intervention before the permission of the Istanbul No.5 Regional Council for the Conservation of Cultural Property.</li> <li>The identified location should be marked as a registered archaeological site on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the registered cultural heritage.</li> <li>The construction activities should be avoided from the registered cultural heritage site during the Project lifespan.</li> <li>Regular monitoring should be done to be aware of whether vibration caused damage to the registered cultural heritage asset during the construction and operation phases.</li> </ul> | Negligible                                |

| No | Attribute Name                 | Potential Impact / Risk   | Project Phases                          | Impact Magnitude |                                    |            |               |          |                      | Sensitivity/<br>Value of<br>Resource/<br>Receptor | Impact<br>Significance<br>(prior to<br>mitigation) | Proposed Mitigation Measures   | Residual<br>Impact<br>Significance <sup>1</sup> |
|----|--------------------------------|---|---|------------------|------------------------------------|------------|---------------|----------|----------------------|---|--|--|---|
|    |                                |   |   | Extent           | Reversibility                      | Duration   | Frequency     | Severity | Overall<br>Magnitude |   |  |  |   |
| 49 | Terkos Water Transmission Line | Terkos Water Transmission Line is a registered cultural heritage asset. According to the project alignments, the transmission line is on the project construction corridor. However, a tunnel will be constructed in this section of the project, and the transmission line will be located above the tunnel. Therefore, any physical effect derived from the construction activities is not expected. On the other hand, the vibration caused impacts of the project may occur during the tunnel construction activities (blasting etc.). These impacts can affect the water transmission line in the long term. | Land Preparation and Construction Phase | Restricted       | Short-term reversible              | Short-term | One-off/ rare | Minimal  | Negligible           | High  | Minor  | <p>The following steps about registered cultural heritage asset should be conducted during the Project lifespan:</p> <ul style="list-style-type: none"> <li>Not allowing any construction / physical intervention before the permission of the Istanbul No.5 Regional Council for the Conservation of Cultural Property.</li> <li>The identified location should be marked as a registered archaeological site on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the registered cultural heritage.</li> <li>The construction activities should be avoided from the registered cultural heritage asset during the Project lifespan.</li> <li>Regular monitoring should be done to be aware of whether vibration caused damage to the registered cultural heritage asset during the construction and operation phases.</li> </ul>  | Negligible                                      |
| 50 | Kavakpınar Cemetery            | Kavakpınar Cemetery is a registered cultural heritage asset. According to the project alignments, the cemetery is on the project construction corridor. However, a tunnel will be constructed in this section of the project, and the cemetery will be located above the tunnel. Therefore, any physical effect derived from the construction activities is not expected. On the other hand, the vibration caused impacts of the project may occur during the tunnel construction activities (blasting etc.). These impacts can affect the cemetery in the long term.   | Land Preparation and Construction Phase | Restricted       | Short-term reversible              | Short-term | One-off/ rare | Minimal  | Negligible           | High  | Minor  | <p>The following steps about registered cultural heritage asset should be conducted during the Project lifespan:</p> <ul style="list-style-type: none"> <li>Not allowing any construction / physical intervention before the permission of the Istanbul No.5 Regional Council for the Conservation of Cultural Property.</li> <li>The identified location should be marked as a registered archaeological site on project/construction drawings.</li> <li>Any ground-disturbed activities should not be planned within the registered cultural heritage.</li> <li>The construction activities should be avoided from the registered cultural heritage asset during the Project lifespan.</li> <li>Regular monitoring should be done to be aware of whether vibration caused damage to the registered cultural heritage asset during the construction and operation phases.</li> </ul>  | Negligible                                      |
| 51 | Chance Finding                 | Risk of impact on potential unknown artefacts or chance find within and in the close proximity of the Project route   | Land Preparation and Construction Phase | Restricted       | Irreversible/ Long-term reversible | Long-term  | One-off/ rare | Minimal  | Low                  | Low   | Minor  | <ul style="list-style-type: none"> <li>There are crucial natural resources (such as water resources, and proximity to agricultural areas) suitable for human settlement around the geographical area where the project is located. On the other hand, there may be tangible cultural heritage assets (chance finds) that have been buried in the geographical area of the Project or its close vicinity and whose existence will be determined by advanced research techniques or that will be unearthed during the construction works. There does exist some potential for the discovery of as yet undisturbed / buried archaeological resources. Hence, a precautionary approach following best practice must be employed.</li> <li>Should unknown archaeological resources be encountered, these must be documented in accordance with Turkish regulations (Law No: 2863) and will add to the country's heritage knowledge and databases. A Chance Find Procedure for the project specific has been prepared by the CHIA Team. This document should be considered and used effectively during the construction and operation phases, taking into account the CHIA study results.</li> </ul> | Negligible                                      |

## 1.1. Purpose

The purpose of the plan is to avoid significant adverse impacts to cultural heritage assets and to describe the provisions for managing chance finds through a chance find process which will be applied in the event that cultural heritage assets is subsequently discovered.

The general purpose of this Management Plan is to:

- Outline the applicable standards with regards to the protection of Cultural Heritage.
- Identify the actual and potential sources of impact on Cultural Heritage.
- Establish effective plans and procedures for managing and mitigating impacts to cultural heritage sites.
- Define roles and responsibilities.
- Define monitoring and reporting procedures.
- Define training requirements.

## 1.2. Scope

This Cultural Heritage Management Plan applies to all project activities that have the potential to cause an impact on the cultural heritage. This includes especially all construction activities of the project and cultural protection measures, such as the chance find procedure (CFP) applicable for the Project.

### 1.2.1. Sources of Impact

The activities to be conducted during all Project phases may cause direct potential impacts on the cultural heritage receptors, if not properly managed. The key Project activities that may result in impact (direct or indirect) upon archaeology and cultural heritage receptors during all Project phases are summarised in Table 1-2.

*Table 1-2: Sources of Impacts on Cultural Heritage Receptors during Project*

| Description of Activity  | Potential Receptors that may be Affected by the Activities  |
|--|---|
| <ul style="list-style-type: none"> <li>➤ <b>Topsoil stripping</b></li> <li>➤ <b>Excavation and Filling</b></li> <li>➤ <b>Cutting</b></li> <li>➤ <b>Blasting</b></li> <li>➤ <b>Construction traffic movement</b></li> <li>➤ <b>Siting of construction sites and other Project/associated facilities</b></li> <li>➤ <b>Piling</b></li> </ul> | <ul style="list-style-type: none"> <li>➤ Human Movements</li> <li>➤ Traffic Movements (vehicles and staff)</li> </ul> |



| Description of Activity   | Potential Receptors that may be Affected by the Activities |
|---|--|
| <ul style="list-style-type: none"><li>➤ Landscaping/ earth-mounding</li><li>➤ Waste disposal including excess excavated materials</li><li>➤ Structures, installation features (fencing, cables etc.)</li><li>➤ Presence of workforce</li><li>➤ Leaks and spills</li></ul> |  |

## 2. OBJECTIVES

The general objectives of this Management Plan are to:

- To define the outline of the applicable standards concerning the protection of Cultural Heritage.
- To identify the actual and potential sources of impact on the Cultural Heritage Assets.
- To establish an effective plan and a procedure for managing and mitigating impacts on cultural heritage sites/assets.
- To define roles and responsibilities.
- To define monitoring and reporting procedures.
- To define training requirements.
- To manage, minimise and mitigate the impacts of construction works on the archaeological and cultural heritage assets, in line with the regulatory requirements by implementing adequate procedures and control mechanisms on site.
- To monitor the CONTRACTOR's performance continuously throughout construction works.
- To refine archaeology and cultural heritage management controls as part of a continuous improvement process.

### 3. REGULATIONS, STANDARDS AND GUIDANCE

In this section, regulations, standards and guidance related to the management of cultural heritage is summarized.

#### 3.1. National Legislations

##### 3.1.1. National Legislation for Tangible Cultural Heritage

In Türkiye, the movable and immovable cultural and natural assets are under protection as dictated by the “**Law on Preservation of Cultural and Natural Assets**”, **2863**, which was published in the Official Gazette numbered 18113 and dated 23 July 1983. The cultural and natural heritage, which is protected by the aforementioned Law, is identified as:

- Natural properties which require protection and immovable assets which were built before the end of the 19th century.
- Any immovable cultural asset constructed after the end of the 19th century but categorized as “a significant asset which requires preservation” by the Ministry of Culture and Tourism.
- Immovable cultural assets located within the boundaries of Protection Sites; Structures, buildings or places that have witnessed significant historical events during the Turkish Independence War or the foundation of the Turkish Republic, regardless of their period and registration status; and all dwellings and buildings that have been used by Mustafa Kemal ATATURK without considering their period of construction or registration status.

The most relevant articles for the project impact assessment studies of the Law on Preservation of Cultural and Natural Assets (Law no: 2863) are given in Table 3-1.

*Table 3-1: Law on the Conservation of Cultural and Natural Property (Law No: 2863, 1983)*

| Article   | Explanation   |
|---|---|
| <b>Article 4 –<br/>Obligation to<br/>Notify</b> | <p>Persons that discover movable and immovable cultural and natural property, owners, proprietors or occupants that know or have recently found out about the existence of cultural and natural property on the land they own or use shall be obliged to notify the nearest museum directorship or the village headman or the local administrators of other places within at the latest three days.</p> <p>If such property is in military garrisons and restricted areas, the relevant command levels shall be notified in line with the relevant procedure.</p> <p>The village headman, the local administrator receiving such notification or the relevant authorities that are directly notified of such property shall take the necessary measures to protect and secure such property. The village headman shall notify the nearest local administrator as of the situation and the measures taken on the same day. The local administrator and other authorities shall notify in writing the MoCT and the nearest museum directorship within ten days.</p> |

|  |  |
|--|--|
|  | Upon receiving this notification, the Ministry and Museum Director shall instigate due proceedings as soon as possible in line with the provisions of this law.  |
| <b>Article 5 –<br/>Quality of<br/>State Property</b> | <p>Immovable property belonging to the state, public institutions and organizations and movable and immovable cultural and natural property to be protected that is known to exist or will be discovered on an immovable property owned by real and legal persons subject to civil law shall have the quality of state property.</p> <p>Registered and annexed foundation property subject to a separate status due to its special qualities shall not be covered by this provision.</p>   |
| <b>Article 25 –<br/>Transfer to<br/>Museums</b>      | <p>MoCT shall classify and register based on scientific principles movable cultural and natural property declared to the MoCT according to Article 4 and movable cultural and natural property to be protected as specified in Article 23. Antiquities that need to be conserved in state museums shall be duly transferred to museums.</p> <p>The criteria, procedures and principles for classification, registration and transfer to museums of movable cultural and natural property to be protected shall be specified in a regulation.</p> <p>The historical features of all kind of weapons and materials concerning Turkish military history shall be surveyed, examined and evaluated by the General Staff at the location they are found or are reported to be found.</p> <p>Antiquities excluded from the classification and registration and not needed to be placed in museums shall be returned with a document to their owners. The cultural property that has been returned with a document shall be at the discretion of their owner. Antiquities not taken back within one year by their owners can be kept at the museum or sold duly by the State.</p> |

In addition to Law no: 2863 on Preservation of Cultural and Natural Assets, there are some regulations and principal decisions governing the management of cultural and natural assets. According to the Principal Decision no: 658 taken on November 5<sup>th</sup>, 1999, on “Archaeological Sites, Conditions of Protection and Usage”, the archaeological sites are classified into three main categories:

**1<sup>st</sup> Degree Archaeological Sites:** Areas requiring highest level of protection, with the exception of scientific excavations aiming their protection. Neither construction nor development are allowed in these sites. All kinds of construction, excavation, and modification activities are prohibited within the boundaries of these sites. However, for exceptional cases such as the necessity for infrastructure construction, Regional Council for the Conservation of Cultural Property may permit such activities based on the approval of the relevant museum directorate and the head of the scientific excavation team.

**2<sup>nd</sup> Degree Archaeological Sites:** Sites which require medium level of protection. They should be preserved based on the conditions of protection and utilisation set by the Regional Council for the Conservation of Cultural Property. Additional construction is prohibited. Similar to the 1<sup>st</sup> Degree Sites, for exceptional cases such as necessity for infrastructure construction among others, Regional Council for the Conservation of Cultural Property may permit such activities based on the approval of the relevant museum directorate and the head of the scientific excavation team.

**3<sup>rd</sup> Degree Archaeological Sites:** Construction is permitted based on the decisions of Regional Council for the Conservation of Cultural Property. Before applying for a construction permit, test pit excavations should be conducted under the supervision of the local museum, and the outcomes of these excavations should be reviewed by the museum and, if present, the head of the scientific excavation team. Reviews should be submitted to Regional Council for the Conservation of Cultural Property. The Council may ask for extension of the scope of test pits before taking any decision.

Furthermore, Implementation Guidelines for Field Surveys, Test Pits and Excavation Works on Cultural and Natural Assets (Ministry approval number 94949537-160.99-51264, dated 13.03.2013) define the procedures for salvage excavations, archaeological test pits and other studies.

### 3.1.2. National Legislation for Intangible Cultural Heritage

UNESCO put into effect the “Convention for the Safeguarding of the Intangible Cultural Heritage” in the 32<sup>nd</sup> General Conference held in Paris between September 29<sup>th</sup> and October 17<sup>th</sup>, 2003. The convention was officially accepted by the Republic of Türkiye with the “Law No. 5448 Regarding the Approval of the Convention of Safeguarding of Intangible Cultural Heritage on January 19<sup>th</sup>, 2006”. The intangible cultural heritage legally safeguarded by the relevant law was defined as follows:

- Cultural products and production processes such as oral narratives and oral traditions created by the folk in oral culture environments and included in folklore studies, performance arts, social practices, rituals and festivals, folklore, practices related to the universe and nature, handcraft traditions.

## 3.2. International Standards

Policies of IFC and EBRD on cultural heritage is set out in the following documents:

- International Finance Corporation, Performance Standard 8, Cultural Heritage, January 1, 2012
- European Bank for Reconstruction and Development (EBRD), Performance Requirement 8, Cultural Heritage, March 2024

The objectives of these documents are:

- To support the conservation of cultural heritage in the context of EBRD and IFC financed projects.
- To protect cultural heritage from adverse impacts of project activities.
- To promote the equitable sharing of benefits from the use of cultural heritage.
- To promote the awareness of, and appreciation of, cultural heritage where possible.

These policies are later adopted by international finance institutions and became widely accepted principles by international lenders.

### 3.3. International Convention and Guidelines

Türkiye has ratified the following key international conventions regarding the cultural heritage, which are applicable to the Project:

- United Nations Educational, Scientific, and Cultural Organisation (UNESCO), Convention on the Protection and Promotion of the Diversity of Cultural Expressions, Paris, 20 October 2005 (Türkiye made the ratification accession on 02 November 2017).
- United Nations Educational, Scientific, and Cultural Organisation (UNESCO), Convention for the Safeguarding of the Intangible Cultural Heritage, Paris, 17 October 2003 (Türkiye made the ratification accession on 27 March 2006).
- United Nations Educational, Scientific, and Cultural Organisation (UNESCO), Convention on the Protection of World Cultural and Natural Heritage, Paris, 16 November 1972 (Türkiye made the ratification accession on 16 March 1983).
- United Nations Educational, Scientific, and Cultural Organisation (UNESCO), Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property, Paris, 14 November 1970 (Türkiye made the ratification accession on 21 April 1981).



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- Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, ICOMOS 2011.
  
  - Guidance and Toolkit for Impact Assessments in a World Heritage Context, ICOMOS 2022.

## 4. ROLES AND RESPONSIBILITIES

### 4.1. Official Responsible Bodies

The basic definitions regarding the management of cultural heritage for the project are given in the following bullets:

- Ministry of Culture and Tourism and its affiliated institutions such as the Museum Directorate and Regional Council for the Conservation of Cultural Property are the responsible authorities regarding all archaeological and cultural heritage related issues.
- For tangible cultural heritage, Istanbul Archaeological Museums Directorate and Kocaeli Museum Directorate is responsible to dispatch experts to the sites within 24 hours after being informed and to officially identify the Chance Find (described in APPENDIX 1- CHANCE FIND PROCEDURE (CFP)). Museum directorate is responsible for the management of excavation within the chance find area. Museum Directorate will follow the directions and decisions of the relevant Regional Council for the Conservation of Cultural Property (İstanbul 1, İstanbul 3, İstanbul 5, İstanbul 6 and Kocaeli) (Table 4-1 and Table 4-2).
- For tangible cultural heritage, Regional Council for the Conservation of Cultural Property (İstanbul 1, İstanbul 3, İstanbul 5, İstanbul 6 and Kocaeli) is the only decision maker on any intervention which would be made on the site after the chance find.
- İstanbul and Kocaeli Provincial Directorate of Culture and Tourism are the sole decision maker for intangible cultural heritage (Table 4-3).

Table 4-1: Responsible Regional Council for the Conservation of Cultural Property

| Regional Council for The Conservation of Cultural Property                       | Contact Information   |                                      |  |
|--|---|--------------------------------------|--|
|  | Adress  | Phone                                | E-Mail   |
| <b>Istanbul Regional Council for the Conservation of Cultural Property No. 1</b> | Hobyar Mahallesi Hamidiye Caddesi Elkon İş Hanı No:5 Kat:3 Sirkeci/ Fatih/ İSTANBUL | (0212) 528 24 78                     | <a href="mailto:istanbulkurul1@ktb.gov.tr">istanbulkurul1@ktb.gov.tr</a>       |
| <b>Istanbul Regional Council for the Conservation of Cultural Property No. 3</b> | Hobyar Mahallesi Hamidiye Caddesi Elkon İş Hanı No:5 Kat:5 Sirkeci Fatih/ İSTANBUL  | (0212) 522 32 85                     | <a href="mailto:istanbulkurul3@ktb.gov.tr">istanbulkurul3@ktb.gov.tr</a>       |
| <b>Istanbul Regional Council for the Conservation of Cultural Property No. 5</b> | Hobyar Mahallesi Hamidiye Caddesi Elkon İş Hanı No:5 Kat:5 Sirkeci Fatih/ İSTANBUL  | (0212) 512 09 20                     | <a href="mailto:istanbulkurul5@kultur.gov.tr">istanbulkurul5@kultur.gov.tr</a> |
| <b>Istanbul Regional Council for the Conservation of Cultural Property No. 6</b> | Hobyar Mahallesi Hamidiye Caddesi Elkon İş Hanı No:5 Kat:6 Sirkeci Fatih/ İSTANBUL  | (0212) 513 91 63                     | <a href="mailto:istanbulkurul6@ktb.gov.tr">istanbulkurul6@ktb.gov.tr</a>       |
| <b>Kocaeli Regional Council for the Conservation of Cultural Property</b>        | Kozluk Mah. İstasyon Cad. TCDD Eski Gar Binası Kat:2 İzmit / KOCAELİ                | (0262) 323 29 26<br>(0262) 323 29 80 | <a href="mailto:ktvk41@ktb.gov.tr">ktvk41@ktb.gov.tr</a>                       |

Table 4-2: Responsible Regional Museum Directorate

| Museum Directorate                                 | Contact Information  |                  |  |
|--|--|------------------|--|
|  | Adress   | Phone            | E-Mail   |
| <b>Istanbul Archaeological Museums Directorate</b> | Alemdar Cad. Osman Hamdi Bey Yokuşu Sokak, Gülhane - Fatih/İSTANBUL    | (0212) 520 77 40 | <a href="mailto:istanbularkeolojimuzei@ktb.gov.tr">istanbularkeolojimuzei@ktb.gov.tr</a> |
| <b>Kocaeli Museum Directorate</b>                  | Kozluk Mahallesi İstasyon Caddesi No: 5 Eski Gar Alanı, İzmit/ KOCAELİ | (0262) 321 22 74 | <a href="mailto:kocaelimuzei@kulturturizm.gov.tr">kocaelimuzei@kulturturizm.gov.tr</a>   |

Table 4-3: Responsible Provincial Directorate of Culture and Tourism

| Provincial Directorate of Culture and Tourism                 | Contact Information  |                  |  |
|---|--|------------------|--|
|   | Adress   | Phone            | Email Adress   |
| <b>İstanbul Provincial Directorate of Culture and Tourism</b> | Alemdar Mahallesi, Bab-ı Ali Caddesi No:28, 34110 Fatih/İSTANBUL | (0212) 395 44 00 | <a href="mailto:iktm34@ktb.gov.tr">iktm34@ktb.gov.tr</a> |

| Provincial<br>Directorate of<br>Culture and<br>Tourism                   | Contact Information  |                  |  |
|--|--|------------------|--|
|  | Adress   | Phone            | Email Adress   |
| <b>Kocaeli Provincial<br/>Directorate of<br/>Culture and<br/>Tourism</b> | Kozluk Mah. İstasyon Cad. Sümer Sokak<br>No:1 İzmit/ KOCAELİ | (0262) 280 17 00 | <a href="mailto:iktm41@ktb.gov.tr">iktm41@ktb.gov.tr</a> |

#### 4.2. Project's Responsible Bodies

Contractor will be responsible for the preparation and implementation of the environmental and social impact assessment-based management plans, which have to be project-specific. These plans shall be applicable, detailed procedures for use in the field have to be furnished. The contractor will ensure the implementation of the commitments stated in the project-specific plans, and also shall comply with all relevant project standards, statutory requirements, permit and license conditions and secure all applicable permits and licences.

The responsibilities of the contractor are given below:

- The main contractor will be responsible for the preparation and implementation of the environmental and social impact assessment-based management plans, which have to be project-specific. These plans shall be applicable, detailed procedures for use in the field have to be furnished. The contractor will ensure the implementation of the commitments stated in the project-specific plans, and also shall comply with all relevant project standards, statutory requirements, permit and license conditions and secure all applicable permits and licenses.is responsible for the management of the plan and implementing the procedures about cultural heritage and archaeological aspects of the Project.
- The main contractor is responsible for periodically consulting with communities within the impact area during the project activities and resolving any potential negative circumstances that may occur in relation with the cultural heritage of local communities.
- The main contractor is responsible for establishing a grievance redress mechanism within the scope of the Project, through which complaints related to cultural heritage can be submitted, and they are periodically monitored for producing solutions.

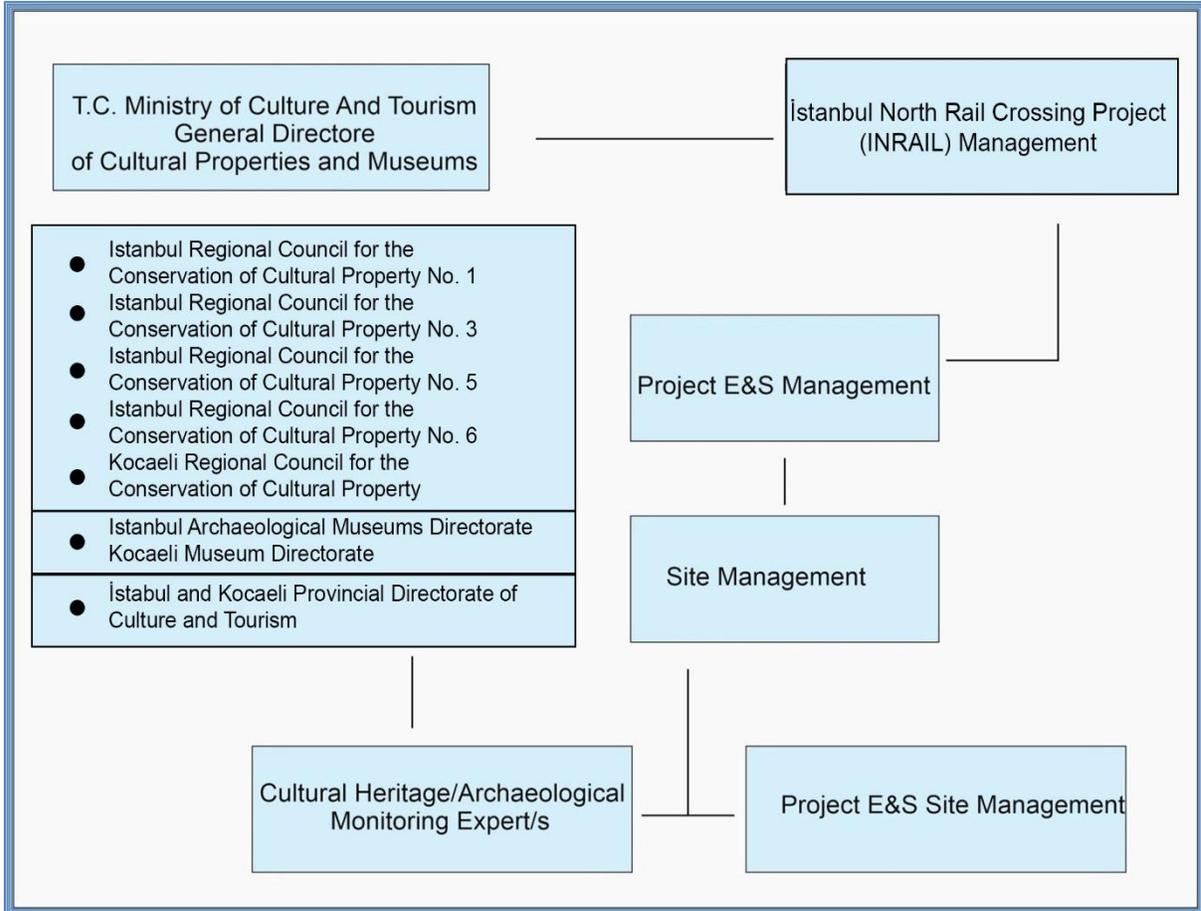
- In case of a cultural heritage related salvage and/or test excavation (including restoration/conservation) required, the main contractor is responsible to provide the necessary staff, technical assistance, other necessary services and equipment.
- Daily archaeological monitoring activities during all ground-disturbing activities of the Project Construction Phase (including reinstatement stages) will be carried out by an archaeologist who will be assigned by the Project subcontractor(s). Archaeological monitoring (watching brief) will cover all project areas. The main contractor will be responsible for the timely assignment of an archaeological monitoring expert (acceptable experience and competency). The main contractor will also be responsible for the control of the daily archaeological monitoring activities for all project construction areas. The assignment of the monitoring archaeologist shall be completed before the construction activities of the project.
- E&S Manager will be in charge of the cultural heritage/archaeological monitoring expert and their daily, weekly and monthly activities.

The responsibilities of the **cultural heritage/archaeological monitoring expert/s** are given below:

- The expert is responsible to implement the monitoring activities with regard to the project's impact on the cultural heritage assets during the design, land preparation and construction phases.
- Monitoring of the daily construction works during the project construction period will be the responsibility of the monitoring the expert.
- The cultural heritage/archaeological monitoring expert will work with the equipment operators and have authority to stop the work. The expert will accompany all ground disturbance activities of the project.
- The expert will instruct the operator to stop the work in case of a chance find. Resuming ground disturbance activities after a chance find will also be under the authority of the expert.
- Cultural heritage monitoring reports (daily, weekly and monthly) will be submitted to E&S Manager by the cultural heritage/ archaeological monitoring expert.
- The expert of the Project will train the employees about CHMP and CFP.

- The expert will ensure that CHMP and CFP are adequately enforced during all ground disturbance activities.
- The expert is responsible to establish good governance between the project management side and official responsible bodies (such as museum directorates and Regional Council for the Conservation of Cultural Property).

Figure 4-1: Management Structure



## 5. BASELINE CONDITIONS AND POTENTIAL SENSITIVITIES

### 5.1. Potential Sensitivities

Table 5-1 summarizes the impacts of construction activities on cultural heritage and archaeological assets.

*Table 5-1: Construction Activities Impact on Tangible Cultural Heritage Features*

| Activities  | Driver   | Value  |
|---|--|--|
| <ul style="list-style-type: none"> <li>➤ Site establishment, site levelling and preparation including stripping topsoil, piling, trenching Horizontal Directional Drilling (HDD) and excavation.</li> <li>➤ Establishment of temporary stockpile areas.</li> <li>➤ Stockpiling of materials.</li> <li>➤ Development of access roads.</li> <li>➤ Solar break planting and fencing works.</li> <li>➤ Use of vehicles, generators, plant and stationary equipment</li> <li>➤ Parking and maintenance areas for construction vehicle</li> </ul> | <p>Mechanical disturbance or land use changes from construction activities</p> | <p>Cultural heritage features:</p> <ul style="list-style-type: none"> <li>➤ High significance within local communities.</li> <li>➤ Some cultural assets support local economies as tourist attractions.</li> <li>➤ Disruption to cultural practices.</li> <li>➤ Obstruction of access routes.</li> </ul> |

## 6. CONTROL MEASURES

The Environmental and Social Control Measures in this section represent “industry good practice” such as those contained in the World Bank EHS Guidelines<sup>2</sup>.

### 6.1. Cultural Heritage Control Measures

Contractors shall consider all the below Control Measures and Standard Requirements for archaeology and cultural heritage (Table 6-1). These control measures are applicable to construction activities such as demolition, site preparation, access routes, site compounds, excavation works.

*Table 6-1: Cultural Heritage Control Measures*

| No | Mitigation Measure  | Responsibility   |
|----|---|--|
| 1  | CONTRACTOR should be considered and used effectively during the construction and operation phases Chance Find Management Plan.  | ➤ The Contractor and INRAIL Project Management   |
| 2  | CONTRACTOR should inform relevant staff (particularly machinery operators) of the location of all protected heritage or archaeological sites (within the project area or its surrounding) and trained in responsibilities to protect identified sites and report any suspected heritage discoveries. Records should be maintained for audit.  | ➤ The Contractor and INRAIL Project Management   |
| 3  | CONTRACTOR should maintain public access to the archaeological and cultural sites construction works in consultation with Project Environment Department.   | ➤ The Contractor and INRAIL Project Management   |
| 4  | CONTRACTOR should not site power generation, blasting, excavation, compaction, heavy vehicle movement, piling hazardous material storage, or other significant source of vibration or contamination within 50m of known heritage sites without approval of Project Environment Department.  | ➤ The Contractor and INRAIL Project Management   |
| 5  | CONTRACTOR should, retain qualified archaeologists with input from Project Environment Department for periodic site inspections and the overall management of the cultural heritage features. Records of periodic heritage inspections should be made available for audit.  | ➤ The Contractor and INRAIL Project Management   |
| 6  | CONTRACTOR should prohibit disturbance or damage to any archaeological and cultural asset including graffiti.   | ➤ The Contractor and INRAIL Project Management   |
| 7  | CONTRACTOR shall in the event of an unexpected archaeological comply with the Chance Find Procedure find CONTRACTORS shall: <ul style="list-style-type: none"> <li>➤ All work must cease at the location where the discovery is made.</li> <li>➤ A temporary buffer zone around the chance find will be put in place.</li> <li>➤ The cultural heritage/archaeological monitoring expert/s will contact the Contractor site management and museum expert immediately.</li> </ul> | ➤ The Contractor and INRAIL Project Management<br>➤ Foreman/ Construction Manager<br>➤ Cultural heritage/ archaeological |

<sup>2</sup> <https://documents1.worldbank.org/curated/en/157871484635724258/pdf/112110-WP-Final-General-EHS-Guidelines.pdf>



| No | Mitigation Measure   | Responsibility  |
|----|--|---|
|    | <ul style="list-style-type: none"> <li>➤ The cultural heritage/archaeological monitoring expert/s will properly secure the chance find site: flagging, no-entry signs etc.</li> <li>➤ Protection of site: the chance find should not be moved, removed or further disturbed.</li> </ul> <p>Work in the area of the unexpected find may only recommence after obtaining approval from the Project Environment Department.</p> | <ul style="list-style-type: none"> <li>monitoring expert</li> <li>archaeologist</li> <li>➤ Site Workers/<br/>Operators</li> </ul> |

## 7. TRAINING, REPORTING AND MONITORING

### 7.1. Training

The cultural heritage/archaeological monitoring expert/s will provide cultural heritage training to all relevant project staff in order to get capacity building with regards to cultural heritage importance and preservation including the implementation of the CFP as part of their Environmental Training.

All on-site construction staff will be trained in the implementation of the CFP and they shall be provided with a basic identification of cultural heritage resources of the area to help them the identification of chance finds.

The expert/s will receive “environmental training” as well as specialized training for the procedures to follow for all ground disturbance activities. These trainings will be repeated periodically. The records of the training such as attendee list, the presentation made during the training, etc. will be kept by the cultural heritage experts as hard copy and electronically copy.

### 7.2. Monitoring and Reporting

The cultural heritage/archaeological monitoring expert/s will record chance finds on the Chance Find Report Form and the Chance Find Register as per the CFP given in APPENDIX 1- CHANCE FIND PROCEDURE (CFP). The register will be kept up to date by the experts. The Chance Find Report Form will be kept in hard copy and as electronical copy within the main project archives. A summary of the status of chance finds will be reported by the experts to Environmental and Social Manager on a weekly basis.

The function of the archaeological monitoring process will be as follows:

- Provide advice to define the areas where the construction activities may continue or shall be stopped due to archaeological/movable/immovable cultural heritage findings.
- To record archaeological/cultural heritage features observed on, and close to the existing project related areas.
- To record archaeological/cultural heritage features discovered during project construction activities.
- To provide advice in the form of a ‘preliminary assessment’ to the relevant department of the project on the significance and implications of new archaeological discoveries on the project construction areas.

All ground disturbance activities will be monitored by cultural heritage expert during the Project activities. In case of encountering any cultural heritage findings, the CFP described in APPENDIX 1- CHANCE FIND PROCEDURE (CFP) will be initiated.

The schedule for monitoring will be developed in coordination with the construction schedule. Monitoring activities will be implemented daily. The monitoring schedule will be dictated by the construction schedule as determined by the construction/operation management.

### 7.2.1. Key Performance Indicators (KPI)

Key performance indicators (KPIs) and records have been defined to observe the performance of the Contractor on the subject of Cultural Heritage. The identified KPIs are expected to be reported in monthly basis. The cultural heritage related KPIs and records to be reported for the reporting period are given in below Table 7-1.

*Table 7-1: KPIs and Measures for Management Plan*

| Performance Indicator  | Type    | Period                                 | Target |
|--|---------|--|--------|
| # of known archaeological/cultural heritage sites damaged during construction activities   | KPI     | Monthly                                | 0      |
| # of times work stopped by Contractor to report chance finds   | KPI     | Monthly                                | 0      |
| % of non-compliances raised by INRAIL Project Management which are closed within agreed timeframe  | KPI     | Monthly                                | 0      |
| In case of any chance finds, the relevant documentation and report preparation and communication were carried out following the Chance Find Procedure.                                 | Measure | During the project construction period | NA     |
| In case of any test pit and/or salvage excavation required, the necessary formal authorisation process is initiated in accordance with the Chance Find Procedure.                      | Measure |  | NA     |
| Adequate resources (assigned archaeology team and staff, equipment, time, budget, etc.) are provided by the project management in the event of any test pit and/or salvage excavation. | Measure |  | NA     |
| Chance finds may require a project revision (re-planning of instalment locations of the power plant panels or any project facility, etc.).   | Measure |  | NA     |

## 8. CHANCE FINDS AND SIGNIFICANCES CLASSIFICATIONS

Regardless of its classification of importance, in case of encountering any cultural heritage; Project activities in the finding area shall be stopped immediately. For tangible cultural heritage, relevant Museum Directorate, for intangible cultural heritage, relevant Provincial Directorates of Culture and Tourism should be notified within 3 days in line with the legislation. The procedure given in APPENDIX 1- CHANCE FIND PROCEDURE (CFP) that must be followed in case of encountering a chance find is based on national legislation and provisions of international standards and best practices. Description of the significance levels of the findings is given below. The following levels are applicable only to tangible cultural heritage.

Following the completion of investigation of the relevant official directorate, the necessary arrangements, such as the identification of the boundaries of the cultural heritage asset/site (finding), its protection by taking necessary measures, notification of workers in order to prevent any physical intervention, will be implemented.

### 8.1. Minor Significance

This type of findings is comprised of a finding isolated from its environment or findings in notably small sizes which may be found by chance. In this case, CFP will be followed.

### 8.2. Moderate Significance

This type of findings is small scale findings in groups or single findings with medium size architectural elements such as tombs. In this case, CFP will be followed. In order to prevent a possible damage, necessary arrangements must be made to determine the boundaries of the archaeological remains to keep the construction equipment out of access.

### 8.3. Major Significance

This type of finding is comprised of findings with great importance such as a settlement area, a tumulus, a mound or a big necropolis (wide graveyard areas with archaeological characteristics) and the construction activities must be immediately stopped, and CFP will be followed. This type of chance find may cover the entire construction site. The entrance and exit of the construction equipment and vehicles cannot be managed without causing any damage to the archaeological remains. Therefore, entrance and exit of the construction equipment and vehicles to chance find area should be prohibited during the archaeological salvage works process for each major significance chance find areas.



## 9. REVIEW AND UPDATE

This Plan is a living document, and the responsibilities, procedures and compliance actions shall be updated as required (e.g. after a change in related legislation or insufficiencies in the implementation of this plan). It is the responsibility of the sub-contractor's expert to be fully aware of its contents, to provide relevant training to staff and to ensure that procedures are being implemented to achieve compliance with this Plan. INRAIL Project Management will be responsible for overall management and control of the day-to-day implementation of the Plan and to ensure compliance with Project standards.

## 10. REFERENCES

- General Directorate of Preservation of Cultural and Historical Heritage, “Law on Protection of Cultural and Natural Assets (1) Law No. 2863”, 1983.
- “Law No. 5448 Regarding the Approval of the Convention of Safeguarding of Intangible Cultural Heritage on January 19th, 2006”.
- Law No. 4848 on the Organization and Duties of the Ministry of Culture and Tourism (Official Gazette No. 25093 dated 29.04.2003).
- ICOMOS (International Council of Monuments and Sites) “Guidance on Impact Assessment for Cultural World Heritage”, January 2011.
- Guidance and Toolkit for Impact Assessments in a World Heritage Context, ICOMOS 2022.
- CIFA, Standard and Guidance for the Collection, Documentation, Conservation and Research of Archaeological Materials (October 2020)
- CIFA, Standard and Guidance for Historic Environment Desk-Based Assessment, (October 2020).
- CIFA, Universal guidance for archaeological monitoring and recording (December 2023).
- CIFA, Universal guidance for archaeological field evaluation (December 2023).
- UNESCO, “Convention Concerning the Protection of the World Cultural and Natural Heritage”, November 1972.
- NEOM Project, Project Technical Requirement, “Archaeology and Cultural Heritage Management Plan”, 2023.
- NEOM Project, NEOM Heritage Department Procedure, “Chance Finds Procedure”, 2024.



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**APPENDIX 1- CHANCE FIND PROCEDURE (CFP)**



## 1. Introduction

There is a possibility of encountering some unknown archaeological sites and cultural heritage assets as a Chance Find during project construction activities. The contractor is responsible for the management and protection of cultural heritage resources within the INRAIL Project's borders.



## 2. Purpose

The purpose of this document is to outline the procedure and respective responsibilities in relation to the management of Chance Finds during project construction works. The procedure applies to all project activities within the project-related associated facilities.

### 3. Definitions

|   |   |
|---|---|
| <b>Chance Find</b>  | Potential cultural heritage objects, features or sites that are identified outside of a formal site reconnaissance, normally as a result of construction monitoring.  |
| <b>Museum Directorate</b>   | İstanbul Archaeological Museum Directorate<br>Kocaeli Museum Directorate  |
| <b>Regional Council for the Conservation of Cultural Property</b> | İstanbul Regional Council for the Conservation of Cultural Property 1.<br>İstanbul Regional Council for the Conservation of Cultural Property 3.<br>İstanbul Regional Council for the Conservation of Cultural Property 5.<br>İstanbul Regional Council for the Conservation of Cultural Property 6.<br>Kocaeli Regional Councils for the Conservation of Cultural Property |
| <b>Provincial Directorate of Culture and Tourism</b>              | İstanbul Provincial Directorate of Culture and Tourism<br>Kocaeli Provincial Directorate of Culture and Tourism   |
| <b>Project</b>  | İstanbul North Rail Crossing Project (INRAIL)   |
| <b>Shall and must</b>   | Indicates mandatory requirements.   |
| <b>Should</b>   | Indicates that a provision is not mandatory but recommended as good practice.   |

## 4. References

### Standards, Legislations and Laws

Ministry of Culture and Tourism, Law No:2863, **Preservation of Cultural and Natural Assets**

Ministry of Culture and Tourism, Law no: 5448, **Law on Regarding the Approval of the Convention of Safeguarding of Intangible Cultural Heritage**

Ministry of Culture and Tourism, Principal Decision No: 658, **Archaeological Sites, Conditions of Protection and Usage**

International Finance Corporation (World Bank Group), **PS 8, Cultural Heritage**

European Bank for Reconstruction and Development (EBRD), **PR 8, Cultural Heritage**

## 5. Roles and Responsibilities

Contractor is responsible for complying with the procedure for onsite activities during project construction activities. All relevant employees involved in construction works will be trained in relation the implementation of the procedure. Contractor will request to prepare a project-specific chance find procedure from all sub-contractors. The sub-contractors will be in charge of the preparation and the implementation of their own chance find procedures in line with the prepared main document by Contractor.

| Project Role   | Responsibilities   |
|--|--|
| Project Manager                                      | <ul style="list-style-type: none"> <li>➤ Ensure E&amp;S issues are being adequately addressed on site by all related departments.</li> <li>➤ Support E&amp;S site providing adequate resources on site to implement E&amp;S monitoring and inspection activities.</li> </ul>   |
| E&S Manager  | <ul style="list-style-type: none"> <li>➤ Preparation or revision of E&amp;S documentation plans and procedures as required.</li> <li>➤ Participation in the identification process of significant impacts for the project and assisting to develop relevant preventive and corrective actions.</li> <li>➤ Coordination of environmental and social information flow.</li> <li>➤ Ensuring that E&amp;S mitigation measures are implemented and controlled during the project construction activities.</li> <li>➤ Developing and implementation of an environmental and social audit program and sharing lessons learned between all related departments and staff.</li> <li>➤ Managing environmental inspectors, community liaison officers and cultural heritage/archaeological monitoring expert/s on site.</li> <li>➤ Maintaining effective communication with the construction and project management team.</li> <li>➤ Ensuring the implementation of project mitigation measures, through on-site daily inspection, advice and assistance to site construction and project management and personnel on all environmental, social and cultural heritage matters.</li> <li>➤ Day-to-day monitoring of construction activities as they related to E&amp;S performance.</li> <li>➤ Implementing NCR or Corrective Actions as required, and track closure.</li> <li>➤ Participating audits relating to E&amp;S matters.</li> <li>➤ Planning and managing the environmental and social trainings for all project staff on Cultural Heritage Preservation and related procedures.</li> <li>➤ Daily reporting of E&amp;S issues in construction activities to Site Management.</li> <li>➤ Weekly reporting of E&amp;S issues in construction activities to Site Management.</li> <li>➤ Participating to meetings related to Cultural Heritage issues.</li> </ul> |
| Cultural Heritage/Archaeological Monitoring Expert/s | <ul style="list-style-type: none"> <li>➤ Provides advice in the form of a 'preliminary assessment' to the site and E&amp;S managers on the significance and implications of new archaeological discoveries in the project activity areas.</li> <li>➤ Ensures Chance Find Procedure is followed,</li> <li>➤ Conducts and documents pre-construction surveys. Records archaeological features discovered during pre-construction and ground disturbance activities.</li> </ul>   |



|  |  |
|--|--|
|  | <ul style="list-style-type: none"><li>➤ Determines the needs for cultural heritage resources protection and implement mitigation measures.</li><li>➤ Has the authority to stop ground disturbance activities to investigate potential chance finds.</li><li>➤ Ensures that the relevant cultural heritage signs are displayed where and when required.</li><li>➤ Implements chance find procedure and provides expertise during a chance find.</li><li>➤ Delivers cultural heritage preservation trainings to all project staff.</li><li>➤ Issues non-compliances when required and ensures all corrective actions are completed in a timely manner.</li><li>➤ Provides daily field and monitoring reports to the E&amp;S manager.</li></ul> |
|--|--|

## 6. Chance Find Process

Cultural heritage/archaeological monitoring expert/s will be on site during all construction and ground disturbance activities to watch for the presence of cultural heritage resources. The following table outlines the step-by-step process to be followed upon a chance find discovery.

|  |   |  |
|--|---|--|
| <p><b>STEP 1 – After the Discovery of a Chance Find:</b></p> <ul style="list-style-type: none"> <li>➤ All work must cease at the location where the discovery is made.</li> <li>➤ A temporary buffer zone around the chance find will be put in place.</li> <li>➤ The cultural heritage/archaeological monitoring expert/s will contact the Contractor site management and museum expert immediately.</li> <li>➤ The cultural heritage/archaeological monitoring expert/s will properly secure the chance find site: flagging, no-entry signs etc.</li> <li>➤ Protection of site: the chance find should not be moved, removed or further disturbed.</li> </ul>  |   |  |
| <p><b>STEP 2 - Recording</b></p> <ul style="list-style-type: none"> <li>➤ The cultural heritage/archaeological monitoring expert/s will fill out Chance Find Form Part A and send a copy to E&amp;S manager within 24 hours.</li> <li>➤ The cultural heritage/archaeological monitoring expert/s will retain a copy of Chance Find form for his/her record.</li> </ul>   |   |  |
| <p><b>STEP 3 – Contact with Local Authority</b></p> <ul style="list-style-type: none"> <li>➤ The cultural heritage/archaeological monitoring expert/s will notify the relevant Museum Directorate for the chance find.</li> </ul>  |   |  |
| <p><b>STEP 4 – Authority’s Decision</b></p> <ul style="list-style-type: none"> <li>➤ The relevant Museum archaeologist will assess the value of the chance find and take corresponding actions.</li> </ul>   |   |  |
| <p><b>STEP 4 A – No Significance to Site</b></p> <ul style="list-style-type: none"> <li>➤ The museum archaeologist declares that the site is considered to be of no significance.</li> <li>➤ The cultural heritage/archaeological monitoring expert/s informs relevant managers.</li> <li>➤ The cultural heritage/archaeological monitoring expert/s records the decision on Part B of Chance Find form and sends a copy to E&amp;S manager within 24 hours.</li> <li>➤ The cultural heritage/archaeological monitoring expert/s retains a copy of Chance Find form for his/her record.</li> <li>➤ No further actions required.</li> <li>➤ This step closes out the chance find procedure.</li> <li>➤ Construction activities may resume.</li> </ul> | <p><b>STEP 4 B – Significance to Site</b></p> <ul style="list-style-type: none"> <li>➤ The museum archaeologist declares that the site is considered to be of significance.</li> <li>➤ Museum directorate archaeologist decides on further actions and informs the cultural heritage/archaeological monitoring expert/s. The Monitoring Expert/s informs relevant managers.</li> <li>➤ Cultural heritage/archaeological monitoring expert/s records the decision on Part B of Chance Find form.</li> <li>➤ Proceed to Step 5</li> </ul> |  |
| <p><b>STEP 5 – Site investigation</b></p> <ul style="list-style-type: none"> <li>➤ Project personnel follows the relevant Archaeology Museum Directorate archaeologist’s instructions.</li> </ul>  |   |  |
| <ul style="list-style-type: none"> <li>➤ After field investigation, Museum archaeologist declares <b><u>the site has minor significance.</u></b></li> <li>➤ The cultural heritage/archaeological</li> </ul>  | <ul style="list-style-type: none"> <li>➤ After field investigation, Museum archaeologist declares <b><u>the site has moderate significance.</u></b></li> <li>➤ Further studies such as test pit / salvage excavations or remote</li> </ul>  | <ul style="list-style-type: none"> <li>➤ After field investigation, Museum archaeologist declares the site has major significance.</li> <li>➤ Salvage excavation is to be completed.</li> <li>➤ Site is to be treated according to Turkish archaeological</li> </ul> |

|   |   |  |
|---|---|--|
| <p>monitoring expert/s inform their managers.</p> <ul style="list-style-type: none"> <li>➤ The cultural heritage/archaeological monitoring expert/s records the decision on Chance Find Form Part C and sends a copy to E&amp;S manager within 24 hours.</li> <li>➤ The cultural heritage/archaeological monitoring expert/s retains a copy of Chance Find form for his/her records.</li> <li>➤ No further actions required.</li> <li>➤ This step closes out the chance find procedure.</li> <li>➤ <b>Construction activities may resume</b></li> </ul> | <p>sensing investigation are to be completed.</p> <ul style="list-style-type: none"> <li>➤ Museum Directorate archaeologist provides instructions, and/or supervision for the studies.</li> <li>➤ The cultural heritage/archaeological monitoring expert/s informs their managers.</li> <li>➤ Under the supervision of the museum archaeologist, project management provides a study team. The team will be composed of qualified archaeologists, other experts and workers.</li> <li>➤ Once the studies/excavation is completed, the study team provides a report to the Museum Directorate,</li> <li>➤ The Museum Directorate reports the study outcomes to the relevant Regional Councils for the Conservation of Cultural Property.</li> <li>➤ The relevant Regional Councils for the Conservation of Cultural Property officially confirms completion of recovery and informs the project management.</li> <li>➤ The cultural heritage/archaeological monitoring expert/s records the decision on Chance Find Form Part C and sends a copy to E&amp;S manager within 24 hours.</li> <li>➤ The cultural heritage/archaeological monitoring expert/s retains a copy of Chance Find form for his/her record.</li> <li>➤ No further actions required.</li> <li>➤ This step closes out the chance find procedure.</li> <li>➤ <b>Construction activities may resume</b></li> </ul> | <p>regulations “Law on the Conservation of Cultural and Natural Property (2863) 21.07.1983.</p> <ul style="list-style-type: none"> <li>➤ Museum Directorate archaeologist provides instructions, and/or supervision for test pit/salvage archaeological excavation.</li> <li>➤ The cultural heritage/archaeological monitoring expert/s inform their managers.</li> <li>➤ Under the supervision of the Museum archaeologist, project management provides a salvage excavation team. The team will be composed of qualified archaeologist and workers.</li> <li>➤ Once the excavation is completed, salvage excavation team provides a report to the Museum Directorate</li> <li>➤ The relevant Regional Councils for the Conservation of Cultural Property officially confirms completion of recovery and informs the project management.</li> <li>➤ Site will be officially recorded and protected according to Turkish regulations.</li> <li>➤ The cultural heritage/archaeological monitoring expert/s inform to the related managers.</li> <li>➤ The cultural heritage/archaeological monitoring expert/s records the decision on Chance Find Form Part C and sends a copy to E&amp;S manager within 24 hours.</li> <li>➤ The cultural heritage/archaeological monitoring expert/s retains a copy of Chance Find form for his/her record.</li> <li>➤ No further actions required.</li> <li>➤ This step closes out the chance find procedure.</li> <li>➤ <b>Construction activities may resume, or preventive further actions are needed</b></li> </ul> |
|---|---|--|

## 7. Monitoring and Reporting

The cultural heritage/archaeological monitoring expert/s will visually monitor all construction areas or other ground disturbance activities for evidence of presence of cultural heritage items. Therefore, sufficient number of monitoring experts should be assigned and kept in the construction area during the project construction period.

Chance Finds will be recorded on the Chance Find Report form. All Chance Find Report forms will be kept in hard copy at the camp and will also be scanned and saved electronically after completion of each section of the form.

Chance Finds will be recorded in the Chance Find Register which will be kept up to date by Monitoring Expert/s. It will be reviewed in regular E&S meetings (weekly or monthly).

## 8. Chance Find Report Form

### RASLANTISAL BULUNTU RAPOR FORMU

| PART A  |  |   |   |
|---|--|---|---|
| BÖLÜM A   |  |   |   |
| Project Location:<br><i>Proje Sahası</i>  | District (İlçe):<br><i>Village (Köy):</i>  | Date:<br><i>Tarih</i>                       | Form No:                                    |
| Name of person reporting chance find:<br><i>Rastlantısal buluntuyu rapor eden kişinin ismi</i>                                    |  |   |   |
| Was work stopped in the immediate vicinity of the chance find?<br><i>Rastlantısal buluntunun tam çevresinde iş durduruldu mu?</i> | <input type="checkbox"/> Yes<br><i>Evet</i>  | <input type="checkbox"/> No<br><i>Hayır</i> |   |
| Was a buffer zone created to protect the chance find?<br><i>Rastlantısal buluntuyu korumak için tampon bölge oluşturuldu mu?</i>  | <input type="checkbox"/> Yes<br><i>Evet</i>  | <input type="checkbox"/> No<br><i>Hayır</i> |   |
| NOTIFICATION  |  |   |   |
| BİLDİRİM  |  |   |   |
| Site manager and E&S manager contacted<br><i>Saha Müdürü ve Çevre müdürü ile irtibata geçildi</i>                                 | <input type="checkbox"/> Yes<br><i>Evet</i>  | <input type="checkbox"/> No<br><i>Hayır</i> |   |
| CHANCE FIND DETAILS   |  |   |   |
| RASLANTISAL BULUNTU AYRINTILARI   |  |   |   |
| GPS coordinates<br><i>GPS koordinatları</i>   | Photo record<br>(minimum HD quality)<br><i>Fotoğraf kaydı (en az HD kalitesinde)</i>   | <input type="checkbox"/> Yes<br><i>Evet</i> | <input type="checkbox"/> No<br><i>Hayır</i> |
|   | If not, explain why:<br><i>Yok ise nedenini açıklayınız</i>                            |   |   |
|   | Other records<br>Specify (drawings, HD quality videos, etc.):<br><i>Diğer kayıtlar</i> | <input type="checkbox"/> Yes<br><i>Evet</i> | <input type="checkbox"/> No<br><i>Hayır</i> |
|   | <i>Belirtin (çizimler, HD kalite videolar, vb.)</i>                                    |   |   |
| Description of chance find:<br><i>Rastlantısal buluntunun tanımı</i>  |  |   |   |

Description of site and vegetation: (e.g. surface sediment type, ground surface visibility, distance to closest watercourse, etc.)  
*Sahanın ve bitki örtüsünün tanımı: (örn. Yüzey sediman türü, yüzey zemin görünürlüğü, en yakın suyoluna olan mesafe, vb.)*

**PART B**

**BÖLÜM B**

**NOTIFICATION OF MUSEUM DIRECTORATE ARCHAEOLOGIST**

**MÜZE MÜDÜRLÜĞÜ ARKEOLOĞUNA BİLDİRİ**

Monitoring archaeologist contacted museum directorate archaeologist  Yes  No  
*Arkeolog müze müdürlüğü arkeoloğu ile irtibata geçti. Evet Hayır*

Date of notification:

*Bildirim tarihi*

Name of museum directorate and Name of museum archaeologist:

*Müze müdürlüğü ve Müze müdürlüğü arkeoloğunun ismi*

Contact number of museum directorate archaeologist:

*Müze müdürlüğü arkeoloğunun iletişim numarası*

**DECISION OF MUSEUM DIRECTORATE ARCHAEOLOGIST**

**MÜZE MÜDÜRLÜĞÜ KARARI**

Date of site visit:

*İlk saha ziyaret tarihi:*

Site of no significance - Construction to proceed with no further action – End of chance find procedure

*Önemsiz saha – İnşaat daha fazla araştırma yapılmadan devam edilebilir – rastlantısal buluntu prosedürün sonu.*

Date of notice to resume work:

*İşe başlama tarihi bildirisi*

Site of significance - Further actions required

*Önemli saha – Ek araştırma gerekmektedir*

Please Fill out Part C

*Lütfen Bölüm C'yi doldurun.*

Name of museum directorate archaeologist:

*Müze müdürlüğü arkeoloğunun ismi*

Contact information:

*İletişim numarası*

|  |   |   |
|--|---|---|
| Site manager and E&S manager contacted   | <input type="checkbox"/> Yes  | <input type="checkbox"/> No   |
| Saha Müdürü ve Çevre müdürü ile irtibata geçildi   | Evet  | Hayır   |
| <b>PART C</b>  |   |   |
| <b>BÖLÜM C</b>   |   |   |
| <b>FURTHER FIELD INVESTIGATION</b>   |   |   |
| <b>EK SAHA ARAŞTIRMASI</b>   |   |   |
| <input type="checkbox"/> Site of minor significance<br><i>Önemsiz saha</i>                 | <input type="checkbox"/> Site of moderate significance<br><i>Az önemli saha</i> | <input type="checkbox"/> Site of major significance<br><i>Çok önemli saha</i> |
| Describe additional work to be conducted:<br><i>Yapılması gereken ek işlerin tanımları</i> |   |   |
| Date started:<br><i>Başlangıç tarihi</i>   | Date completed:<br><i>Bitiriş tarihi</i>  |   |
| Date of notice to resume work:<br><i>İşe başlama tarihi bildirisi</i>                      |   |   |
| Name of museum directorate archaeologist:<br><i>Müze müdürlüğü arkeoloğunun ismi:</i>      |   |   |
| Contact information:<br><i>İletişim numarası</i>   |   |   |
| Construction manager contacted   | <input type="checkbox"/> Yes  | <input type="checkbox"/> No   |
| <i>İnşaat müdürü ile irtibata geçildi</i>  | <i>Evet</i>   | <i>Hayır</i>  |



## 9. Chance Find Register

| Date of Find | Summary of Chance Find | Name of Authority Notified | Action Taken | Chance Find form Completed | Status Open or Closed | Remarks |
|--------------|------------------------|----------------------------|--------------|----------------------------|-----------------------|---------|
|              |                        |                            |              |                            |                       |         |
|              |                        |                            |              |                            |                       |         |
|              |                        |                            |              |                            |                       |         |
|              |                        |                            |              |                            |                       |         |
|              |                        |                            |              |                            |                       |         |

## 10. Contact Information

| Regional Council for The Conservation of Cultural Property                       | Contact Information   |                                      |  |
|--|---|--------------------------------------|--|
|  | Address   | Phone                                | E-Mail   |
| <b>Istanbul Regional Council for the Conservation of Cultural Property No. 1</b> | Hobyar Mahallesi Hamidiye Caddesi Elkon İş Hanı No:5 Kat:3 Sirkeci/ Fatih/ İSTANBUL | (0212) 528 24 78                     | <a href="mailto:istanbulkurul1@ktb.gov.tr">istanbulkurul1@ktb.gov.tr</a>       |
| <b>Istanbul Regional Council for the Conservation of Cultural Property No. 3</b> | Hobyar Mahallesi Hamidiye Caddesi Elkon İş Hanı No:5 Kat:5 Sirkeci Fatih/ İSTANBUL  | (0212) 522 32 85                     | <a href="mailto:istanbulkurul3@ktb.gov.tr">istanbulkurul3@ktb.gov.tr</a>       |
| <b>Istanbul Regional Council for the Conservation of Cultural Property No. 5</b> | Hobyar Mahallesi Hamidiye Caddesi Elkon İş Hanı No:5 Kat:5 Sirkeci Fatih/ İSTANBUL  | (0212) 512 09 20                     | <a href="mailto:istanbulkurul5@kultur.gov.tr">istanbulkurul5@kultur.gov.tr</a> |
| <b>Istanbul Regional Council for the Conservation of Cultural Property No. 6</b> | Hobyar Mahallesi Hamidiye Caddesi Elkon İş Hanı No:5 Kat:6 Sirkeci Fatih/ İSTANBUL  | (0212) 513 91 63                     | <a href="mailto:istanbulkurul6@ktb.gov.tr">istanbulkurul6@ktb.gov.tr</a>       |
| <b>Kocaeli Regional Council for the Conservation of Cultural Property</b>        | Kozluk Mah. İstasyon Cad.<br>TCDD Eski Gar Binası Kat:2<br>İzmit / KOCAELİ          | (0262) 323 29 26<br>(0262) 323 29 80 | <a href="mailto:ktvk41@ktb.gov.tr">ktvk41@ktb.gov.tr</a>                       |

| Museum Directorate                                 | Contact Information  |                  |  |
|--|--|------------------|--|
|  | Adress   | Phone            | E-Mail   |
| <b>Istanbul Archaeological Museums Directorate</b> | Alemdar Cad. Osman Hamdi Bey Yokuşu Sokak, Gülhane - Fatih/İSTANBUL    | (0212) 520 77 40 | <a href="mailto:istanbularkeolojimuzesi@ktb.gov.tr">istanbularkeolojimuzesi@ktb.gov.tr</a> |
| <b>Kocaeli Museum Directorate</b>                  | Kozluk Mahallesi İstasyon Caddesi No: 5 Eski Gar Alanı, İzmit/ KOCAELİ | (0262) 321 22 74 | <a href="mailto:kocaelimuzesi@kulturturizm.gov.tr">kocaelimuzesi@kulturturizm.gov.tr</a>   |

| Provincial Directorate of Culture and Tourism                 | Contact Information  |                  |  |
|---|--|------------------|--|
|   | Adress   | Phone            | Email Address  |
| <b>İstanbul Provincial Directorate of Culture and Tourism</b> | Alemdar Mahallesi, Bab-ı Ali Caddesi No:28, 34110 Fatih/İSTANBUL | (0212) 395 44 00 | <a href="mailto:iktm34@ktb.gov.tr">iktm34@ktb.gov.tr</a> |
| <b>Kocaeli Provincial Directorate of Culture and Tourism</b>  | Kozluk Mah. İstasyon Cad. Sümer Sokak No:1 İzmit/ KOCAELİ        | (0262) 280 17 00 | <a href="mailto:iktm41@ktb.gov.tr">iktm41@ktb.gov.tr</a> |

