



SIA Criteria Compliance of Third Bosphorus Bridge (Yavuz Sultan Selim) Social Impact Assistentment

Üçüncü Boğaz Köprüsü'nün (Yavuz Sultan Selim) Sosyal Etki Değerlendirme(SED) Kriterlerine Uygunluğu

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Öz

Projelere uygulanan sosyal etki değerlendirilmesine yönelik standart bir uygulama modeli eksiktir. Plan ve projelerde SED ile ilgili Türk mevzuatındaki temel kriterlerin eksikliği nedeniyle, bu çalışmada, sosyal onay kriterlerinden ve BM, OECD ve Dünya Bankası gibi bazı kurumların yürüttüğü kapsamlı çalışmalardan faydalanılarak SED raporlaması için önerilerde bulunulmuştur. Nihayetinde uluslararası düzenlemelerden yararlanılarak sosyal etki değerlendirmesinin içinde olması gereken kriterler; paydaşları belirleme, kategori belirleme, ana hedefler, sorunlar, etkiler, zorluklar, riskler ve fırsatlar ile paydaş katılımını şart koşan kurumsal ve kredi kurumunun gerekliliklerinden oluştuğu belirlenmiştir. Kriterler değerlendirirken politik uygunluk, analitik doğruluk, ölçülebilirlik incelenmektedir. 52 metre genişliğiyle dünyanın en geniş köprüleri arasında ve 322 metre kule yüksekliğiyle eğik askılı köprü sınıflandırmasında "Dünyanın en yüksek köprüsü" olan örnek proje olan 3. Boğaz Köprüsü, Asya ve Avrupa kıtalarını birbirine bağlamaktadır. Bu kadar önem taşıyan projede çevresel ve sosyal etkiyi değerlendiren ÇED, SÇD ve KÇED raporları bulunmamaktadır. Projede yalnızca 2013 yılında uluslararası finans kuruluşlarının hazırladığı SED raporu bulunmakta olup rapor toplumsal onay kriterlerine göre değerlendirilmiştir. Makalede; örnek alan üzerinde yapılan değerlendirmelerin yanı sıra Türkiye'deki SED uygulamalarına yönelik önerilerde de bulunulmuştur.

Anahtar Kelimeler: SIA, Türkiye, Mevzuat

ABSTRACT

There is a lack of standard implementation model to evaluate social impact, which could be applied to every project. Due to the weakness and non-existing basic criteria in Turkish legislation on SIA in plans and projects, in this study, the SIA reporting has been prepared by benefiting the social approval criteria and comprehensive studies conducted by certain institutions such as UN, OECD and the World Bank. Ultimately, drawing on international regulations, the criteria that should be included in a social impact assessment are: stakeholder identification, categorization, key objectives, issues, impacts, challenges, risks and opportunities, and institutional and credit institutional requirements for stakeholder engagement. When evaluating criteria, political relevance, analytical accuracy, measurability are examined. The 3rd Bosphorus Bridge, which is an exemplary project among the world's widest bridges with a width of 52 meters and "the highest bridges in the world" with its oblique span bridge appearance with its 322 meter tower accessories, connects the Asian and European continents. The project with such importance, do not hold EIA, SEA, and CIA reports, which evaluates environmental and social impact. The project only holds the SIA report, which was conducted in 2013 by international finance institutions, and the report was evaluated according to the criteria for social approval. Along with the evaluations on the sample field, suggestions has been set forth for the SIA implementations in Türkiye.

Keywords: SIA, Türkiye, Legislation

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INTRODUCTION

Social, economic, cultural conditions and living systematics that differ according to these deepen the human-environment relationship. This relationship brings along human's tendency to the environment through positive or negative activities. Therefore; determining the impact of politics, law, planning and the implementation conditions of these on the environment and human's health has become crucial. When the environmental impact of the activities in point are determined, it brings forth the possibility to prevent potential damage on the environment (Smith, 2017). Various impact evaluation systems exist around the world. In our country, Environmental Impact Assessment (EIA), Strategic Environmental Impact Assessment (SEA), Cumulative Environmental Impact Assessment (CIA) and Social Impact Evaluation (SIA) systems are implemented.

In the process of project permits in our country, there exists legal regulations which enforce EIA, SEA, CIA. However, there is an absence of social impact evaluation enforcement in the project permission process in Turkey. Even though EIA, SEA and CIA are mandatory in legislation and execution, the social impact of these projects are not stressed adequately. Consequently, even in the existence of mandatory EIA, SEA and CIA by Turkish legislation, foreign investors reinforcing credit on politics, programs, plans and projects do not consider these as sufficient and enforce SIA to be included(Kurbonova,2020).

Living dynamics that differ accordingly with day by day changing social, economic and cultural conditions, lead the way to strengthening the human-environment bond. This bond brought along humans inclination to the environment through positive or negative activities. Thus the impact determination of politics, legislations, planning and the implication of these on human and environment health has been essential. As a result of the current necessity, assessing the aspect of the environmental impacts in advance has been brought up and by interpreting the data displaying a concrete study has been inevitable. When the activities environmental impacts are determined this will pave the way to counteract the possible harm on human and environment. On this account environmental impact evaluation systems has been developed(Gürtuna, 2016). Environmental impact evaluation systems has been developed within the context of sustainability principal, one of the basic principals of environmental law. Principal at issue, anticipates a balance between economic growth and protection of the natural resources and aims for a growth system which will take the ecosystems carrying capacity into account(Karakitapoğlu vd, 2016). With various impact evaluation systems existing around the world, in our country, Environmental Impact Assessment (EIA), Strategic Environmental Impact Assessment(SEA) Cumulative Environmental Impact Assessment (CIA) and Social Impact Assessment (SIA) systems are implemented.

In 1950's and 1960's, with the negative effects of various projects conducted previously emerging, environmental awareness began to rise and embraced by various countries around the World(Barrow, 1997). In the conclusion declaration of "Human and Environment" conference, assembled in Sweden's capital city Stockholm, on 5 July 1972, member countries of the UN, emphasized the environmental issues taking place in different regions around the world, with the tendency to reach extreme importance has become a threat to all humanity and that this common issue could only be resolved by a coordinated work on a common solution.

Within the "Environment Conference" that took place in Rio De Janeiro, in 1992, took part as "Environmental Impact Evaluation" accepted as the 17th principal of the Rio Declaration, shall be utilized as a national instrument to evaluate the environmental impact and shall be used on activities that hold immensely crucial harming qualities and dependent on expert national authorities." Hence, the terms of "Environment" and "ecology" addressed as crucial and on an international level, has been handled equal as a sustainable development, has been supported by various agreements, declarations and environmental programs which include many protection and renewal measures. (Fanuscu, Aydın,2003) Differently titled environmental impact evaluation systems exist around the world. Today the EIA process is included in the legislation of almost all countries and has been adopted as a fundamental element of international law (Türker, Aydın, 2023). Various evaluation systems such as

Ecological Impact Evaluation, Environmental Impact Evaluation, Strategic Environmental Impact Evaluation, Social Impact Evaluation, Ecuador Principals, and Cumulative Impact Evaluation exist in different structures or interconnections.

Legally, three impact evaluation systems exist in our country. EIA, SEA and CIA is applied with related articles and regulations on Environmental Law, based on Article 56 of the Constitution.

Within Article 56 of the Turkish Constitution, came into force in 1983, with the environmental law no. 2872's article 10, EIA gained a legal basis for the first time in Turkish law and it is stated that the regulations related to the subject shall be arranged. This process has been defined legally in our country, with the first EIA Regulation, ten years after the legislation has been published. Environmental Impact Assessment System (EIA), is a system aiming to dispose or suppress the negative implications of suggested projects and activities on the environment, by defining these implications. EIA process is evaluated in two different categories according to the legislation. Projects subjected to EIA Regulation has been sorted as two lists. In the procedure, meetings has been assembled with the project holder and public participation, by the institutions and establishments warranted by the ministry, to inform about the investment and for the purpose of taking suggestions and opinions on the project. For the relatively small scaled projects subjected to Appendix 2 procedure, public participated meetings do not take place.

Strategic Environmental Evaluation (SEA); is defined as a systematic process in which the possible environmental outcomes, economic and social factors are taken into account related to certain suggested politics, plans or programs. Within the alignment laws of European Union's regulation framework, in Article 10 of the Environmental Law took place in 2006, it was stated that the methods and essentials regarding SEA will take place in the SEA Regulation to be issued.

On 08.04.2017, Strategic Environmental Evaluation Regulation has come into force. This systematic process, evaluated by taking the environmental outcomes, economic and social factors into account, related to the various subjects of the plans and programs regarding the future of the countries is classified as Strategic Environmental Evaluation (SEA). Worldwide SEA implementation fields are; International Agreements, Privatization, National Budget, Perennial Investment Plans, Legal Regulation Proposals, sectoral and global policies, sectoral planning, land based and field utilization plans, whilst in Türkiye the implementations take place as; Region Development Administration Action Plan, Region Plans, Integrated Coastal Field Plans, Environmental Order Plans, Planning Studies in Energy Sectors, Waste Management Planning on the basis of Basin, Sewage Distillation Action Plans on the basis of Basin, Basin Protection Action Plans, Basin Drought Management Plans, Basin Master Plans, Basin Flood Management Plans, Rural Development Programs, Culture and Tourism Protection and Advancement Regions and Plans located in Tourism Centers, Agricultural Master Plans, Tourism Coastal Construction Master Plan, Türkiye Industry Strategy, Türkiye Tourism Strategy, Transportation and Communication Strategy, Transportation Main Plans, National Basin Management Strategy, Special Strategy Plans, River Basin Management Plans, Operational Programs. Consultation and Public participation meetings take place in SEA implementations but only in the context of opinion receiving.

Evaluating the cumulative impacts should not be pictured apart from EIA process.

Evaluating these impacts should be taken as an inseparable part of every phase of the process. Cumulative Impact Assessment is; a project or a project activity that analyses the environmental variations that are caused by past, present or projected as possible future human activities. In the EIA Regulation, dated on 25th November 2014, law no. 29186, published on the official gazette, there is no direct provision about the legislation concerning the CIA. Although, in the extension phase of the EIA process, EIA Commission could be requested to conduct the CIA studies.

Unlike the traditional approach used in EIA, it aims to evaluate the long-term impacts in the past and future, take Valuable Ecological Components (DEB) into consideration, hence both the related project and the different actions of past, present or projected as possible future interacting, consider the importance of not only the local and direct impacts but also external impacts (indirect impacts,

cumulative impacts and the interaction of impacts), evaluate the impacts on wider fields (regional fields). Cumulative impacts are not necessarily different than the impacts analyzed within the scope of EIA, in fact impacts that are analyzed are commonly identical. Many EIA focuses on the local scale and only takes the foot prints and field each project's component covers. As for CIA, it extends the evaluation scale even more in a sense it takes it to the regional scale. The difficulty for the executioner here is that, how to evaluate how wide the field that encircles the actions is, determining how to evaluate the mostly complicated interactions between acts in execution. At its core CIA and EIA are identical therefore it is based on the specified EIA (DB ve ÇŞB, 2012a).

In environmental impact procedures taking place in Turkish Law System, not noting the social impact sufficiently, in other words, the weakness of mutual awareness, holds the risk to cause issues. Accordingly, even if SEA, EIA, CIA has been performed by the Turkish legislation, foreign investors reinforcing credit for the intended politics, programs, plans and projects are regarded as inadequate and are forced to perform SIA if it would provide financial support.

In Türkiye, such legal regulation that enforces social impact evaluation in the permission process of projects, does not exist. Social affirmation (impact) is identified as “ the consent freely given by the local communities and shareholders that have been informed prior to a project” [World Bank, 2004]. In the sense of social affirmation, decreasing the potential impacts and risks, being informed on the social values, traditions and beliefs is notably crucial. A standard implementation model that could be applied on every project for the social affirmation purposes does not exist. Regional and social subjects alternate for each project. This condition should be primarily taken into account prior to the planning process of social affirmation. Within this context, socio-economic data gathering and evaluation of the data processes, play a crucial part in the determination of the road map. From now on, since the social impact evaluation is requested by all international finance institutions and Ecuador Principle banks, it is a global necessity. (Vanclay and Hanna, 2019). In the social impact evaluation developed by defending the way of thinking that social needs are determining the markets and corporates should not only aim for the shareholder value but also aim for the common value creation, accordingly the shared value is that social detriments causes the firms budget expenses, the social risks are required to be managed efficiently and it acknowledges that a positive corporation reputation should increase job opportunities by creating a social license for activity and growth (Hidalgo et al, 2014). From now on, the social impact evaluation became a part of the way how firms operate and usual environmental and social management systems. Certain implementations that can be specified as social impact and social consent exist in Turkish law system. One of these is participation meetings, that are on the environmental issues, which includes the public in the decision making mechanisms. In the Environmental Impact Evaluation (EIA) Regulation, a limited “public participation meeting” process is described. Regarded in projects EIA report under the title of “socio-economic impacts of the project”, information's exhibiting the project fields demographic structure is cited and the data's are usually conducted without a proper field work and compiled by no specialists. In EIA and SEA implementations, achieving sociocultural interaction through public participation meetings and receiving the public opinion in these meetings is essential. Opinion; is not a legally binding procedure. Even in the possibility of the opinion being negative, putting the projects declined by public into practice is encountered. Public participation meetings exist in SEA implementations but the situation is no different then EIA implementations. In this respect, SIA is a stronger evaluation system than other implementations, regarding shareholder participation. SIA is an extensive and participatory administration process that occurs in the process of interaction between the effected and effector of projects and needs to be administrated in order to decrease the negative effects on place and life. SIA reports are composed for the purpose of sentimentalizing the social and special alteration of the process of interaction between the effected and effector and is aiming to guide the decision makers (Göksu et al, 2015).

Social Impact Evaluating; does not take part under a separate title in Turkish Law system.

Public participation and opinion receiving implementations, that are similar to SIA, takes a place in Turkish law system under the “participation” title in EIA and SEA implementations. Investors retaining

projects supported by international funds, also demand SIA reporting, even though the project includes an environmental impact evaluation that fits the Turkish legislation, due to the frequently changing legislation, many cases regarding to the case existing and the implementation issues. For SIA, Turkish legislation being inadequate and hence difficulties of providing balance between the economic-social and environmental elements, in plans and projects, extensive studies prepared by specified institutions such as BM, OECD and World Bank are utilised. When Social Impact Evaluation reporting is conducted, report planning is based on the criteria in Ecuador Principles and IFC Standards. Besides, in the determination of social impact, committee decisions between Principles and Guiding Information Issued Establishments are also influential.

SIA in general, can be defined as a foundation to evaluate all the impacts on humans and the paths of societies and humans interacting with sociocultural, economic and environmental settings. The term contains in its structure, all the humane impacts including cultural impacts, social impacts, structural impacts, gender impacts, resource topics, political impacts etc.

Foreign investors retaining projects supported by international funds, even though the project includes an environmental impact evaluation that fits the Turkish legislation, in advance to the institutions loan granting also demand SIA reporting due to the frequently changing legislation, many cases regarding to the case existing and the implementation issues. International financial institutions do not take the impact evaluation systems implementations in Turkey, as a basis and also demand a SIA evaluation.

1. Methodology

Social Impact Evaluation, is not only decided according to the risks toward the lenders but also to the loaners method execution expectations, by all the international financial institutions and Ecuador Principles banks. All credit institutions have procedures requiring SIA, for instance Performance Standards (IFC 2012) of International Finance Corporation and Inter-American Development Bank.

Benefiting from these instructions, scientists determined the base criteria necessary for the principles and formed the frame (Vanclay, F., 2012 Götzmann N, Vanclay F, Seier F. 2016). According to these, Principles specific to SIA practice

1. Equity considerations should be a fundamental element of impact assessment and of development planning.
2. Many of the social impacts of planned interventions can be predicted.
3. Planned interventions can be modified to reduce their negative social impacts and enhance their positive impacts.
4. SIA should be an integral part of the development process, involved in all stages from inception to follow-up audit.
5. There should be a focus on socially sustainable development, with SIA contributing to the determination of best development alternative(s) – SIA (and EIA) have more to offer than just being an arbiter between economic benefit and social cost.
6. In all planned interventions and their assessments, avenues should be developed to build the social and human capital of local communities and to strengthen democratic processes.
7. In all planned interventions, but especially where there are unavoidable impacts, ways to turn impacted peoples into beneficiaries should be investigated.
8. The SIA must give due consideration to the alternatives of any planned intervention, but especially in cases when there are likely to be unavoidable impacts.
9. Full consideration should be given to the potential mitigation measures of social and environmental impacts, even where impacted communities may approve the planned intervention and where they may be regarded as beneficiaries.
10. Local knowledge and experience and acknowledgment of different local cultural values should be incorporated in any assessment.
11. There should be no use of violence, harassment, intimidation or undue force in connection with the assessment or implementation of a planned intervention.
12. Developmental processes that infringe the human rights of any section of society should not be accepted.

Based on this literature, criteria consisted within the scope of Turkish Environmental Legislation, is specified by the study published in the book; INSAC Academic Studies on Social and Education Sciences, under Chapter 5: Implementation Criteria of Social Impact Assessment (SIA) System in Türkiye. This article is shaped on the specified shareholder participation of the social impact criteria. Yavuz Sultan Selim Bridge ÇSED Report's coherence is examined based on the discussed criteria.

In Environmental Impact Evaluation (EIA) Regulations, a limited popular opinion illumination process is described regarding the EIA process. Meanwhile EIA, SEA and CIA studies conducted in Türkiye are mainly focused on detecting the projects potential environmental impacts and evaluation; **including the impacts on the social environment to the legislation**, is viewed as weak. Detecting the activities social dimensions stay limited to the literature studies and informing the shareholders in the public participated meetings on the projects. Social studies necessary for the EIA Report, are limited to the data conducted by the literature studies and the information's specific to the region, shareholders and local public which the activities will be influential, are tried to be completed without sufficient information.

When determining the criteria for the social consent concept, due to the weakness of Turkish legislation and the challenges of maintaining the balance between economic-social and environmental elements, comprehensive studies conducted by certain institutions such as UN, OECD and the World Bank are benefitted.

In the study; specified criteria necessary to be applied on project's various steps in a healthy shareholder participation will be evaluated in participation and shareholder scale of Yavuz Sultan Selim Bridge SIA Report.

For a healthy shareholder participation, strategic reasons of shareholder consultation, with which groups are the key shareholders, main targets, issues, impacts, challenges, risks and opportunities, legal, corporate and credit agency necessities stipulating shareholder participation, being main requirements of SIA evaluation, is evaluated in my previous studies. 8 main headlines (criteria) are necessary elements required to evaluate in SIA report.

First criteria is primarily determining the project's category². According to these criteria, for projects that are in category A and category B, SIA should be held. Shareholder participation should take a significant place in SIA report. Besides, reporting should be conducted by independent units. To put it in a different way, strategic reasons of shareholder consultation, key shareholder groups, corporate and credit agency necessities requiring shareholder participation, should take place in the report.

Social risk evaluation and management of SIA report, should also be included to the report. An impact chapter should be formed.

Political convenience, analytical accuracy and measurability should be analyzed.³ In shareholders aspect, it is necessary for the report to draw a representative frame of pressures on the social responses. In the content of "Main Goals" of the report, political convenience, analytical accuracy and measurability should be laid out clearly. During the main goals evaluation, poverty, education and demography should also take place.⁴ Sutra Sustainability Transportation Indicators, only applied to transportation projects form issues, difficulties, risks and opportunities (demography, land usage, economy) headlines.

² Determined by basing on Ecuador Principles. For all the projects in categories A and B, borrowers, prepare an action plan intended for the evaluation findings. Action Plan, describes the necessary activities that should be applied to decrease the impacts and risks described in the evaluation, studies intended for correction and necessary tracing precautions to manage the impacts and risks. For risky projects, the government, takes opinions and informs the borrowers or the third party specialists and society effected by the project. Borrower, creates a complaint mechanism as a part of the administration system. An independent social and environment specialist who is not directly related to the borrower, reviews the documents related to the action plan and information/consultation process, evaluates the projects in categories A and B and evaluates the convenience to the EP.

A typed projects: projects at a high complexity level and creating high valued job. Possesses difficult conditions for the firm. Uses the latest technology. Holds high risks. For the purpose of increasing the success expectations, works on using all the means and techniques related to the project management. E.g. Power Plant

A typed projects: Short but very important projects for the firm. Suggested to use all the means and techniques related to the project management. Creates a decent job value and should be paid attention as a technology. E.g. Product Development

Resource ; effective project management: Traditional, Agile, Extreme, Seventh Edition, Robert K

Wysocki, PHD ² (Guidelines 1 and 2)

³ These features are based on OECD criteria.

⁴ UN Sustainable Development Goals

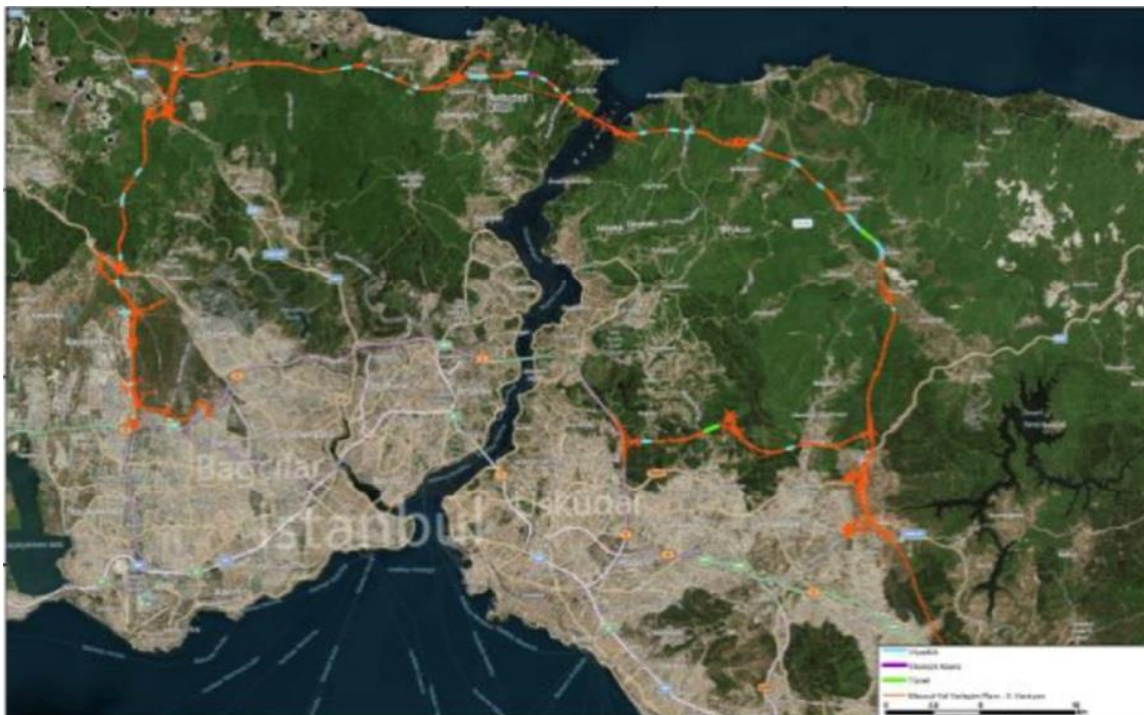
Criteria to be used are described below; (Velioglu, N, 2021, İstanbul).

SIA Criteria:

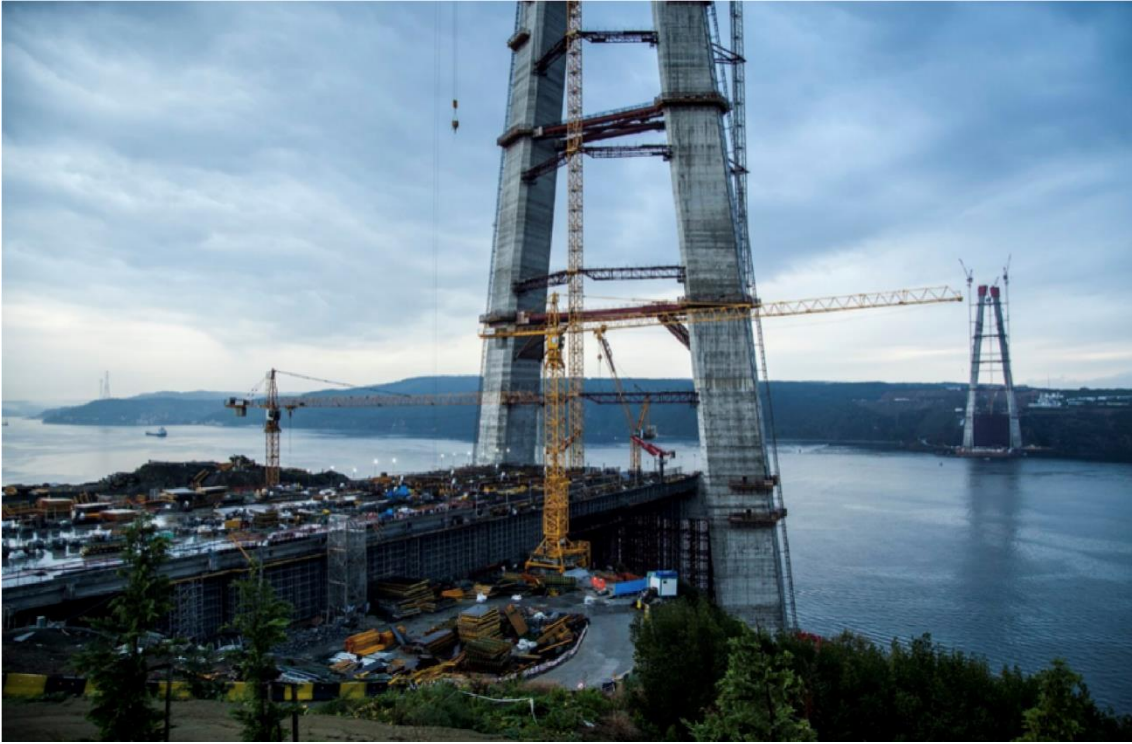
-Strategic reasons of shareholder consultation (Category Determination, units that will conduct the reporting, poverty, education, demography)
-Which groups the key shareholders are
-Main goals
- Issues
-Impacts
-Difficulties
-Risks and Opportunities
- Corporate and credit agency necessities, conditioning the shareholder participation

2. Evaluating the SIA Report Prepared For Yavuz Sultan Selim Bridge

Yavuz Sultan Selim Bridge or The Third Bosphorus Bridge, is bridge constructed on the north side facing the Black Sea (Picture 1). The bridge, is the widest bridge in the world with its 52 meter width, “Worlds topmost bridge” in the leaning sling bridge classification with its 322 meter tower height, second highest tower as a leaning sling bridge within all bridge classifications and is the longest bridge containing a railed system on, with its 1.408 meter main span and possesses the ninth longest middle span between all suspension bridges. The foundation was laid in May 2013 and !8.5 million being spent in 27 months, the bridge was opened to traffic in August 2016 afterwards.



Picture 1: Yavuz Sultan Selim Bridge and connection roads <https://www.3kopru.com/> .



Picture 2: Construction stage, Tower and Approach Viaduct 2014 <https://www.3kopru.com/ozelgaleri/28#prettyPhoto>

The project, with such importance does not hold an impact evaluation. Yavuz Sultan Selim Bridge does not hold EIA, SIA and CIA reports.

Northern Marmara Highway, which includes Istanbul Third Bosphorus Bridge, has been exempt from Environmental Impact Evaluation (EIA) process⁵, with the changes made on EIA legislation⁶.

Mentioned project conducted on a field including forest and agricultural fields, to not hold EIA and SIA reports in which the social and environmental values are determined, due to the connection roads connecting the continents to each other, is a major deficiency for the international financial establishments. Therefore, Yavuz Sultan Selim Bridge's SIA has been requested from the firm who won the bidding on the bridge's construction (ICA), by the bank consortium providing the credit (credit agencies).

⁵ And with claims of this situation being contrary to the Environmental Law, international environmental protection agreements and public interest, field a suit against the state council, non-governmental organisations as plaintiff, with the request of the arrangement's cancellation. The case, defended the perspective of, projects and investments with completed bidding phases and in the phase of production and operation to be evaluated by state council, could cause even bigger public damages to form. In the State Council 6. Chamber decision, intention was drawn to, EIA regulations importance and excluding the investments holding an environmental impact from EIA implementations with environmental protection purposes, will form an intervention to the right of living in a healthy and balanced environment, "Mentioned projects to be excluded from EIA implementations, with evaluating these project's possible negative environmental impacts in the future, will prevent the precautions that should be taken for environmental pollution and destruction, features a clear intervention on the right of living in a healthy and balanced environment." statements took place. In the State Council decision, "By the Article 56 of Supreme Court, accepted as a necessity of environmental protection assignment, excluding investments that have not completed the bidding stage and not completed de facto from the EIA implementations, does not hold a necessary precaution feature." is stated. With drawing attention to EIA's main purpose, which is to detect the activities possible and current negative environmental impacts and according to these detections, to ensure that the decision makers will give right decision on the investment, State Council 6. Chamber deduced that "It is clear that conducting EIA implementations in terms of investments in the production and operation stages, will not protect the environment and prevent the environmental pollution and destruction." in contrary. In the unanimously voted decision, State Council governed that "If the public investment's bidding process is completed, employment, production and operation has started, to put it differently, carried out with significant financial resources and if it is now contributing to the economy, when the state of environmental damages of these investments, with their contributions to the economic and social life compared; that abandoning the production or the operation, will lead to even bigger negative impacts than the environmental impacts with the possibility to erase."

⁶ On 9 May 2013, with changes made on the EIA legislation's temporary 3. Article, arrangements of EIA exemption on various projects, has been canceled by Supreme Court.

In Yavuz Sultan Selim Bridge's SIA reports, the studies aim is determined as conducting an environmental and social evaluation for the project, detecting the potential environmental and social impacts related to the projects construction and management and providing the impact decreasing precautions to decrease the negative impacts. In SIA, actions regarding the projects construction and management are compiled and Environmental and another document titled as Social Action Plan (ÇSEP) has been offered. A Forestation Plan, to decrease the impacts on the forested fields which the project passes through directly, has been added to this.

The project owner is the General Directorate of Highways (KGM). SIA report is shared with the credit agencies, for the projects financing intentions. The project's aim is determined as conducting an environmental and social evaluation for the project, detecting the potential environmental and social impacts related to the projects construction and management and providing the impact decreasing precautions to prevent, decrease or compensate the negative impacts⁷.

This pre-evaluation approach refers to the guidelines taking place in UFK Guidelines, Turkish Environmental Law and Environmental Impact Evaluation Guidelines (Institute of Environmental Management & Assessment (EIMA). To detect the impacts importance, criteria of buyers precision, importance or value to be determined is tried to be based on guidelines, laws, legislative specifications and/or approved generally, professional jurisdiction system.

For a healthy shareholder participation, at which stage the project is, strategic reasons of shareholder consultation at this stage, which groups the key shareholders are, which necessities the legal, corporate or credit agencies are laying down as conditions to the shareholder participation with main goals, issues, impacts, challenges, risks and opportunities, is evaluated in the SIA evaluations main condition's material and management chapter. Evaluating these criteria is crucial for Yavuz Sultan Selim Bridge.

2.1 Yavuz Sultan Selim Bridge ÇSED Report Analysis As Part Of The SIA Criteria For The Shareholder Participation

2.1.1 Strategic Reasons For The Shareholder Consultation

According to the SIA criteria; when determining the strategic reasons for the shareholder participation; the unit that will conduct the reporting should be determined. After choosing the category of the project, shareholders concerns, future field usage and environmental arrangement plans should examine all the possible risks, considering the poverty, education and demography.

The unit that will conduct the reporting and the category selection has been made in Yavuz Sultan Selim SIA report. For the shareholder concerns and future field usage, along with the sentence of "With the mentioned shareholders concerns and future field usage and the possible risks the environmental arrangements would create being significant, should be critically taken into consideration by the headquarters and the government offices.", continuing with however, since ICA does not have any authority on the future plans development for Istanbul province, in this report, no further information on future environmental order/ development plans has been mentioned, with being said, the report has been left deficient in the stage of determining the future impacts, in this sense.

Possible risk has been brought up, with "Field utilization form, effects the social integrity in various ways. In general, rural and country fields are accepted as significantly convenient locations to live. Since these locations are physically divided from the disturbing activities such as traffic, famine and crime. Vehicle traffic, tends to harm the societies physical integrity, with the reasons of corrupting the walking conditions and decreasing the interaction possibilities between people in the neighborhoods." being stated.

⁷ Scope of ÇSED, AECOM (Report No: AECOM-TR-R590-03-00, November 2012)

It is also stated that, the city at risk will expand to north because of the project and with this reason, delicate and ecologically significant regions needed to be protected will be effected negatively and irrevocably from the improvements that will take place in the future on the mentioned fields.

Possible risks that could be created by shareholder concerns, future field utilisation and environmental arrangement plans to take place in the report is positive however not conducting detailed examining and risk analysis is a major deficiency.

2.1.2 Key Shareholders

According to the SIA Criteria, when determining the key shareholders, shareholders should be consisted of broad districts and from different groups. Shareholders are selected by evaluating the economy (city and cities economic structures relative wealth state), demography (grandness and ageing structure of urban population), field utilization (urban function) and special distribution of urban citizens, for the fields that will be effected by the project.

With transparent information sharing and efficient communication being the foundation of a successful shareholder participation, it takes place as a crucial criteria in SIA procedure. The briefing to take place in the begging of the project and ensuring the key shareholders participation to the process, helps to establish trust in the society. First stage of social consent is, to provide public's trust to the company. If sense of trust is not formed in shareholders, the support possibility of a project decreases.

According to this, shareholders; should consist of sensitive individuals, civic associations and local societies, government establishments, non-governmental organizations and other opinion advocacy groups, media and opinion leaders, current and potential customers, company shareholders, managers and employees, work associates, credit agencies and potential investors, transnational organizations and academic circles.

After the shareholders have been determined, remarkable matters exist in the shareholder participation process. Accordingly; whether the communication is being made, not only with the public representatives but also with the public directly, not focusing only on the shareholders expressing themselves more, emphasizing with the shareholders, being transparent as much as possible, managing the public expectations, not making promises of practices that could not be put into practice, the project to be consistent of what it states and does, gaining trust with decent implementations, not forgetting that the project employers are key shareholders and information mediums, ensuring that the contractor companies are acting in the same way, recording the processes and agreements decently and preparation against negative situations are necessary.

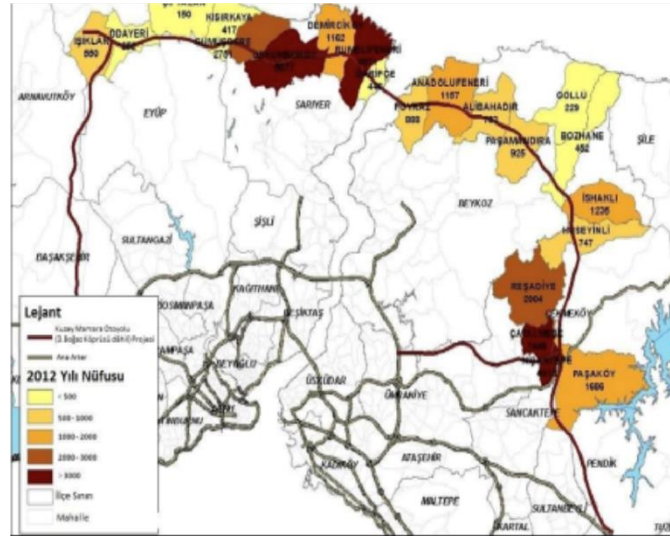
In the report, shareholders take place as, individuals who can be described as external or internal individuals and individuals or groups owning the qualifications stated below. In the light of these studies, Yavuz Sultan Selim Bridge SIA reporting to be efficient and the shareholder participation process to be designed according to the requests and concerns of the communities and implication and management ways, have been inspected. Being effected from the project directly or indirectly; being interested in the project and the project activities or possessing the ability to effect the project and the planned results, reflects the shareholder qualities.

A Shareholder Participation Plan exists in the report. According to the plan; shareholders are inspected and described as below:

When the communities effected by the project are analyzed, it is pointed out in the report that the gap between the effected groups or categories is significantly wide. It is stated to include settlement sites that are effected by the project, individuals not living in the area but interested in a new project or politic alterations.

Other individuals effected by the project are the ones using the field which the project will be conducted.

- Settlements inside the project area: Göllü Village, Ishaklı Village, Paşamandıra Village, Poyraz Village, Bozhane Village, Hüseyinli Village, Reşadiye Village, Işıklar Village, Odayeri Village, Paşaköy Village, Demirci Village, Garipçe Village, Uskumruköy Village, Alibahadır Village, Kısırkaya Village, Çiftalan Village, Rumelifeneri Village, Gümüşdere Village, Anadolufeneri (Anatolian Lighthouse), Nişantepe Village, Çatalmeşe Village and Çamlık Village.



Picture 3: Settlements Effected By The Project

- Local, district and national official public institutions; in a way to include the organized local, national and international environmental pressure groups, non-governmental organizations (NGO's) and related international establishments, entrepreneurs and local company owners;
- Financial institutional investors, credit lenders and other investors; local and national scaled media organs such as newspapers, television and radio channels and, information newsletter and social media such as blogs and social networks etc. Project employees are also shareholders.

In the report; 80 shareholder takes place including NGO's, municipalities, public authorities, professional associations.

As the project under discussion is exempt from EIA, the report states that no official opinion was sought from any government or local authority during the preparation of the SIA. EIA preparation. This situation is a critical deficiency in terms of community participation and accountability.

In the report; it is told that Northern Marmara Highway Project (3. Bosphorus Bridge included) brought forth some discussions; official establishments' and non-governmental organizations' (NGO's) deciding on the projects construction have different perspectives and demands and that clearly these cases will cause new discussions and conflicts on the project.

It is seen in SIA reports that settlement surveys are conducted in villages to gather background information by contacting the headman.⁸ Besides, household surveys conducted by contacting the households in the project area also exist.⁹

In the survey, face to face interview method has been implemented. The surveys have been conducted with families grown members through visits to families, as one to one interviews using standard questions.

8 Settlement Survey

Information on the past of the village is gathered by contacting the village headman. These surveys compose the main resources on gathering information about the settlement as a whole.

9 Household Survey

Surveys have been conducted with households in the project area. In the study, households have been interviewed face to face.

In the study, official visits to families and a survey using a standard question form with the eldest member of the family have been made. In the study several specific points have been focused on, including main living resources, issues on the project site and tendencies to the proposed project Every settlements sample size has been conducted according to the number of people living in the settlement.

Total population of the project sites settlement is 37.343. It is estimated that mentioned area contains 9.336 houses. Sample size; has been determined by plus or minus 0,01 error margin with 0,95 confidence level. 652 households have been interviewed on this basis. At least 10% of every households family members have been interviewed. The sample size has been determined by using the formula below:

$$n = \frac{N * t^2 * p * q}{((N - 1) * d) + (t^2 * p * q)}$$

n= sample size

N= population d= error margin p= predicted repetition frequency on the project site t= % 95 confidence level q= 1-p

This formula is false for the mentioned area. Because when calculating the sample size we do not take t unit on 30 or over units (Özmen et al, 2019). Hence the number 652 is evaluated as small in terms of measurability and as a wrong unit. Not specifying the number clearly causes to make mistakes when forming the key shareholders. A sketchy material error injured the report as a whole.

District	Residential area	Population in 2012	Number of Houses	Number of Meetings Made
Beykoz	Alibahadır	783	196	13
Beykoz	Anadolu Feneri	1157	289	19
Beykoz	Bozhane	452	113	10
Beykoz	Göllü	229	57	10
Beykoz	İshaklı	1235	309	22
Beykoz	Paşamandıra	925	231	15
Beykoz	Poyraz	888	222	15
Çekmeköy	Çatalmeşe	7446	1862	124
Çekmeköy	Hüseyinli	747	187	12
Çekmeköy	Nişantepe	5413	1353	90
Çekmeköy	Reşadiye	2004	501	33
Eyüp	Çiftalan	150	38	10
Eyüp	Işıklar	550	138	10
Eyüp	Odayeri	252	63	10
Sancaktepe	Paşaköy	1686	422	30
Sarıyer	Demirciköy	1162	291	19
Sarıyer	Garipçe	448	112	10
Sarıyer	Gümüşdere	2751	688	46
Sarıyer	Kısırkaya	417	104	10
Sarıyer	Rumeli Feneri	3571	893	59
Sarıyer	Uskumruköy	5077	1269	85
Total		37,343	9336	652

In the report; when the interviewed household members are examined according to their age-group distribution, it is seen that the highest ratio (16,1 %) is in the 20-29 age-group range. The ratio of 10-19 and 50-59 age-group range are 15,1%. Population ratio of 60 years and over is 16%. People living in the stated households 59,8% is in the 20-59 age-group range. On the basis of these datas, it is possible to state that this population is young and economically active, statement takes place.

Sample a

In the report, 84,7% of the respondents stated that they support the project that will soon begin in the region. The conclusion of many people agree that the project is important and that it will bring significant economic benefits to the region has been reached. In the report which the shareholder number should be clearly specified, “many people” is not a measurable number.

It is stated that there is a reliance of interview people will assist to solve Istanbul’s transportation issues but this number has been given as 33,5%. This rate is not worth to construct a certain judgement sentence. 33,1% of the respondents estimate that the project will not provide any direct benefit however states that they estimate it to be beneficial for our country.

	Number	%
Helping the development of the country	503	33,1
Creating job opportunities	354	23,3
Solving Istanbul's Transportation Problem	510	33,5
Those who have no idea	60	3,9
Valuation of lands	91	6,0
Others	3	0,2
Total	1521	100,0

Northern Marmara Highway (3. Bosphorus Bridge included) Project also brought up various discussions with it. Respective parties - local public, official establishments’ and non-governmental organisations’ (NGO’s) deciding on the projects construction had different perspectives and demands. The statement takes place in the report as, these matters will clearly raise new discussions and conflicts.

The project’s possible long-term and crucial effects on the forests and the natural habitat is questioned by environmental and social NGO’s on the national level. Related NGO’s, stated their disagreement to this project. 52 NGO’s, came together under the name of “Living Platform Rather Than 3. Bosphorus Bridge” and declared that they are against this project. These declarations took place in the report.¹⁰

Türkiye Chamber of Architects, stated that the third bridge will increase the traffic rather than solving the issue. This case took place in the report.¹¹

¹⁰ The platform consisting of 52 NGO’s, on 10 May 2008, manifested a declaration to UNESCO-ICOMOS WHC members, in Sariyer and “52 members of the NGO’s and establishments signed the declaration of “Living Platform Rather Than 3. Bosphorus Bridge”. The disagreeing individuals’ common displays can be regarded as preserving nature and cultural history and taking responsibility for the future. For instance; “In the press release published in Turkish and international media, 10 May 2008, Sariyer – Boğaziçi, Istanbul” considerations as below have been expressed:

- Protecting our forests, water resources and atmosphere,
- Our land, our region, our past, our Bosphorus,
- We are calling Istanbul, Türkiye and people all around the world to participate our campaign, • We are against the third bridge on Bosphorus that endangers our lives,
- Human life, not the bridge!”.

¹¹ Even though it is expected in the report that the third bridge will relieve the traffic jam, some NGO’s claim that the third bridge will probably increase the traffic. It is estimated that the third bridge, just as the two previous bridges, will not solve Istanbul’s traffic issue, instead it will cause unresolvable new issues. For instance; Türkiye Chamber of Architects, Urbanization and Planning Committee President Yıldız Uysal, refuses the claims that a third Bosphorus bridge, which will complicate the life in a city where 13 million people live, will solve Istanbul’s

Different NGO's declared negative opinion one the bridge mentioned and this case took place in the report.¹²

2.1.3 Main Goals

Detecting the current social and economic circumstances of the houses around the project area; should take place as from examination until the deactivating process, potential social impacts related to the project around the life cycle of a whole company to be inspected and evaluated; in a convenient case, determining the general impact decreasing precautions included to the project

Main goals are found under the title of key goals, in the report.

Important goals of the study on the Northern Marmara Highway (Third Bosphorus Bridge included) project;

- Determining the current social and economic circumstances of the houses around the project area,
- Potential social impacts related to the project in the whole living cycle of the company to be inspected and evaluated;
- Explaining the general impact decreasing precautions that are included to the project, as far as possible.

2.1.3 Issues

The important problems that may arise during the operational life of the project, the potential for land use change in the long term, the potential for uncontrolled migration due to land use change, and similar problems specific to that project should be clearly identified.

Laying out clearly, important issues which could be revealed during the project's execution life span, the long-term change potential of the field usage, uncontrolled immigration potential related to the changes of field usage and such issues peculiar to that project.

In SIA Evaluation; among important negative effects which could be revealed during the project's execution life span are;

- **the long-term change potential of forestry and rural field usage,**

traffic jam issues. It is claimed that the project will create a massive threat on the cities forests and natural resources. Environmentalist activists, suggest that a few animal and plant species specific to the region will extinct, water reserves nourishing the city can face a drying risk or it could be polluted in a unusable way. In addition to these, it is suggested that the highway's and the third bridge's could cause a rapidly spreading urban sprawl and that as a result immigration to Istanbul which has a negative impact on the city's social texture will increase (Guardian, 2012)

¹² Turkish Environmental & Woodlands Protection Society (TÜRÇEK) president, Associate Professor Barbaros Gönençgil, from Istanbul University

Geography Department, is scared that a third bridge on Bosphorus, will harm the city's ecosystem and the rich flora occurring as two climates (Mediterranean and Black sea) because of the city's location, immensely (Today's Zaman, 2011). As explained above, environmental establishments, city planners and many Istanbul citizens, express their serious worries about a third bridge construction on Bosphorus. Signified people and communities claim that the project will damage the city's remaining green areas, even worsen the city's traffic and it will cause an explosion of the city's already sky-high population.

According to Nature Association Director General, Engin Yılmaz, government authorities should ask themselves how much more Istanbul and Istanbul's population will grow. Engin Yılmaz continued as "From now on, not even one nail should be driven to Istanbul and we believe that every driven nail is a treason to this city." Besides, he also added that Istanbul's traffic issue can not be solved by a new bridge construction. The Turkish Foundation for Combating Soil Erosion (TEMA), also criticized the third bridge construction. TEMA representative, stated opinions as below:

"As TEMA, we do not take the third bridge case as a topic related to Istanbul's traffic issue, we are envisioning how Türkiye will be in the future. Istanbul struggles with serious urban issues because of rapid transformation projects. Unplanned progress, leads to water basin destruction which are the city's, agricultural field's, forest's and grassland's life support systems. It should not be forgotten that the foundation already laid third bride, stands for more carbon emission, more forest destruction and less carbon dissociation."

The president of The Chamber of Urban Planners Çare Olgun Çalışkan, from Istanbul branch, connected to The Union of Chambers of Turkish Engineers and Architects (TMMOB), stated that the bridge and the way which will take in the north side of Istanbul is an issue, it is contradictory with 1/100.000 scaled Environmental Arrangement Plan of Istanbul and 1/25.000 scaled Istanbul Master Development Plan (Dişli-Zıbak, 2013).

- Uncontrolled internal migration potential related to the field usage change, - increasing traffic can be counted with the pollution issue.

reported in this form.

2.1.4. Impacts

Project's potential impacts; on the protected areas of the field, on the ecological connection and transportation, on the owned habitats regarding the ecological value, tree, vegetation, endemic species and animals, should be studied. It should be evaluated separately as negative and positive impacts.

Direct impacts are inevitable impacts and indirect impacts are possible impacts. Direct impacts are short or long term impacts caused by the sites physical construction.

Indirect impacts are caused by construction, care/maintenance or sites usage and can not be seen easily. Job and Working Circumstances, Resource Fertility and Pollution Prevention, Public Health, Security and Safety, Performance Standard, Field Purchases and Forced Resettlement, Protecting the Biological Variety and Sustainability Management of Living Natural Resources, Local Folks and Cultural Heritage should be studied under this title.

The titles of ecological and biological variety, field usage, air quality, traffic noise and vibration, water quality, geologic and soil waste management, visual impact evaluation, socioeconomic and archeological heritage, take place in the report.

Potential impacts contain some parts of the officially protected areas to be harmed and lost temporarily, during construction. Besides, fragmentation issues can appear, at the points where officially protected field's sections disconnect from each other during construction and operation; it is stated that this case limits public transportation opportunities and ecological connection.

It is reported that, habitats, holding importance in terms of construction and operation, ecological value, tree, vegetation, endemic species and animals can be resulted in annihilation. Especially during construction activities, because of polluters, sediment, dust, people (workers) entrance and public entrance to the less used and less damaged places until now, indirect damages can emerge. It is stated that, it has potential impacts on a set of other habitats such as dense and extended thicket, improved pasture, buildings and agricultural fields.

All these habitats, have the potential to support various species. Construction works, can effect these fields in the same way it effects the other four fields. Permanent impacts include habitat lost, division issues, increasing discomfort and long term reconstruction pressures to be experienced in the future. Other species include spineless (butterfly e.g.) and possible fish species. Because of the fact that spineless species are connected to their habitats, losses and damages these fields will go through will effect their numbers as a whole.

Since fish in general, are related to the low water quality of the field, possible impacts on fish are habitat loss, water quality change and drainage issues.

In this way, negative and positive sides of determined direct and indirect impacts are also exhibited.

2.1.4.1. Negative Impacts

Noise and dust; dust and polluter particles to be spread

Safety risks towards people and stock farming

Traffic increase

According to the households; pollution (21,3%), natural atmosphere disruption (14,85 %) and dust (10,1%) are the most important negative impacts of the project. It is necessary to inform the public on

what kind of positive and negative impacts the project will have and how to decrease these impacts to the lowest level. Mentioned impacts have been reported in this form.

2.1.4.2. Beneficial Impacts

Employment opportunities to be created in the region and economical activities to gain variety is stated as beneficial impacts in the report.

2.1.5. Challenges

The challenges that could appear before, during or after the project should be determined, how these will effect the project's course should be studied.

Challenges do not take place in the SIA report. The report is deficient in this regard.

2.1.6. Risks and Opportunities

A risk evaluation for the project should be conducted. Also the opportunities should be studied too. Risks and opportunities taking place in Sutra indicators such as crashes, car usage rate, usage extent of alternative technology should be evaluated in this section.

Besides, surface water resources in or around the region are delicate resources. If the necessary decreasing precautions are not taken, a water pollution risk exists. Construction works will cause a risk on the water resources. In the project's construction and operation processes, such issues on the drainage design or crashes are originated by the cases that could cause a polluter release to the environment on levels unforeseen before and because of the possibility of polluter releases such as hydrocarbons, risks on underground water resources and recharge regions exist.

Mentioned shareholders concerns and risks that could be caused by future field usage and landscaping plans being important, they should be seriously taken into consideration by central and local government offices. However, because the ICA not having an authority on developing prudential plans, this report, did not make more room to the possible impacts of landscaping/ development plans for Istanbul province.

2.1.7. Legal, institutional and credit agency necessities conditioning shareholder participation

Due to the legislation, legal, institutional and credit agency necessities conditioning shareholder participation should take place in the report. Credit agencies requests should also be studied in the report.

What the legal, institutional and credit agency necessities conditioning shareholder participation are, take place in the report. To detect the importance of the impacts, determining criteria of buyers sensitivities, importance or value, are based on the broadly consented guidelines, laws, legal determinations and/or professional judiciary.

Turkish Environmental Law forms a legal frame on regulating industrial and infrastructure projects and possible effects on the environment. Benefits from Environmental Law and related Legislation have been used, is declared on the report.

It is stated that the project is evaluated according to the UFK Guidelines, performance standards and related guidelines notes.¹³

¹³Guidelines

UFK General Occupational Health and Safety Law Guidelines (2007)
Occupational Health and Safety Law Guidelines for Toll Roads (2007) and
Occupational Health and Safety Law Guidelines for Construction Material Extraction Procedures (2007)

DISCUSSION AND CONCLUSION

Minimum standard determination without sticking to countries national legislation is crucial for projects such as Yavuz Sultan Selim Bridge that could affect the whole ecosystem. In the decision made by International Court of Justice, in 2006 and 2015 years, it is stated that if the project that will be conducted for the first time will have transboundary harms that could damage the project seriously, environmental impact evaluation (EIA) implementations should be part of the International Practice Law¹⁴

International finance establishments; lay down SIA reporting as a condition because the social impact evaluation is lacking in EIA, SIA and CIA procedures and none of these evaluations existing in the study sample area studied in Yavuz Sultan Selim Bridge, also to provide support credit to the shareholder participation emphasized projects.

SIA Evaluation system being totally independent from the internal legislation, criteria are determined by taking Ecuador Principles, IFC standards, OECD Environmental Indicators, SUTRA Sustainability Transportation Indicators, Victoria Political Sustainability Transportation Indicators and UN Sustainable Development Indicators as basis.

When Yavuz Sultan Selim Bridge report, prepared to be presented to the international financial establishments is examined, it is not possible to reach the conclusion that the report is compatible with the determined criteria. SIA evaluation headlines as strategic reasons of shareholder consultation, which groups are the key shareholders, main goals, issues, impacts, challenges, risks and opportunities, institutional and credit agency necessities conditioning shareholder participation have been handled and evaluated separately by excluding the "Challenges" headline. In this sense, the report is important in terms of enabling international wealth and the headlines but the content is not satisfying.

The report pointed has some deficiencies in terms of quantity and content. Because the sample size formula calculation is conducted falsely; when the report is examined, it is seen that only 10 people (15 in some places) have been interviewed on the project. Mistakes made in the beginning when creating key shareholders injured the report. Public institutions that have key shareholders also support the report with their opinions. When determining the negative impacts that could rise during the operation lifespan of the project, long term change potential of the field usage on forest and rural areas, uncontrolled internal migration potential related to the field usage change and increasing traffic is also mentioned, with the pollution issues.

In the report, "risks that could be created by shareholders concerns, future field usage and environmental order plans being crucial, they should be taken into account seriously by central and local public institutions" mentioned statement takes place and since the company preparing the report does not have any authority on the future plans development for Istanbul province, in this report, additions have been made about the lacking discourse of the impacts of future environmental order/development plans. Not proposing alternative solution suggestions on determined issues of negative irrevocable damages to a city, displays that the report is not satisfactory in terms of content and underestimation of social dimensions exist.

Therefore; arrangements can be made in SIA legislation for international finance projects. Towards the criteria which will be determined within the scope of the legislation, a classification as stated in EIA legislation for activities classified this way, a social impact evaluation in a different scope and content arrangement should be a legal compulsory. Current legal legislation regarding the environmental and

¹⁴ Pulp Mills on the River Uruguay (Argentina v. Uruguay), Judgment, I.C.J. Reports 2010, no. 14, filed a law suit against Uruguay at the Argentine International Court of Justice (Pulp Mills Case). In the 17. Case, constructing a paper stock factory on the riverside between Argentina and Uruguay and consenting to a second one, is against both to the signed agreement between two countries in 1975 and the International Practice Law. On 16 December 2015, in International Court of Justice cases, certain Activities Carried Out by Nicaragua in the Border Areas (Costa Rica and Nicaragua) and Construction of a Road in Costa Rica Along the River San Juan (Nicaragua and Costa Rica), in situations which cross-border serious damages could be seen, EIA obligation has been confirmed.

social impact evaluation in Türkiye, is developed by taking more extensive legal regulations that are conducted in the world on this case.

For all projects where environmental impact assessment is mandatory, social impact assessment should also be considered a requirement and should be included as a separate heading in the environmental law. Some countries have legislation that makes social impact assessment mandatory. The regulations and systems of these countries can be studied and used as examples for projects to be carried out in Türkiye within this framework. In this case, in addition to these legislative studies, new projects focusing only on this situation can be proposed by the competent administrations.

As another suggestion, changes including social impact evaluation preparation to be added to EIA and SIA regulations, for all the projects that the environmental impact evaluation is mandatory within the scope of legislation, should be provided. In other words, instead of changing the legislation completely, another suggestion is to add amendments to the EIA and SIA regulations to include the preparation of a social impact assessment for all projects for which an environmental impact assessment is mandatory under the current legislation.

Compliance with the Ethical Standard

Conflict of Interest: *The author(s) declare that they do not have a conflict of interest with themselves and/or other third parties and institutions, or if so, how this conflict of interest arose and will be resolved, and author contribution declaration forms are added to the article process files with wet signatures.*

Ethics Committee Permission: *In this article, ethics committee approval is not required, and a consent form affirming that a wet-signed ethics committee decision is not necessary has been added to the article process files on the system.*

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