GREEN ROAD PROJECT FROM AN ENVIRONMENTAL JUSTICE PERSPECTIVE: STAKEHOLDERS, ALTERNATIVES AND CONFLICTS

by

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ABSTRACT

GREEN ROAD PROJECT FROM AN ENVIRONMENTAL JUSTICE PERSPECTIVE: STAKEHOLDERS, ALTERNATIVES AND CONFLICTS

There is a two-way interaction between tourism and environment. On the one hand, many forms of tourism depend on the environment and natural beauties in order to sustain themselves and use the nature as the main resource in many aspects; and on the other hand, it has drastic negative impacts on the environment both in terms of land and resource use, waste generation, and carbon emissions. In general, these adverse impacts are not taken into consideration properly when tourism policies are formulated, or they are even ignored on purpose in many instances and nature is sacrificed in favor of economic benefits, causing many socio-environmental conflicts around the world. At this background, this thesis assesses the socio-environmental conflict around the Eastern Black Sea Green Road Project and aims to reveal the attitudes of the stakeholders in the region. The Green Road Project was developed as a solution to the difficult and unsafe transportation problem between the plateaus and is put forward by DOKA (Eastern Black Sea Development Agency) as connecting "...the important plateaus and tourism centers of eight provinces and [allowing] domestic and foreign tourists coming to the region to travel along the determined route in an improved physical structure" (DOKAP, p.24, 2016). This thesis reveals that national tourism policies and implementations focus rather on the economic dimension and mostly ignoring ecological distribution and the procedural justice issues. This in turn causes local level ecological distribution conflicts and prevents an encompassing, just, and sustainable tourism practice.

ÖZET

ÇEVRE ADALETİ PERSPEKTİFİNDEN YEŞİL YOL PROJESİ: PAYDAŞLAR, ALTERNATİFLER VE ÇATIŞMALAR

Turizm ve çevre arasında iki yönlü bir etkileşim vardır. Turizm, doğayı birçok yönden ana kaynak olarak kullanır ve bu nedenle pek çok turizm türü, varlığını sürdürebilmek için çevreye bağımlıdır. Öte yandan turizmin hem arazi hem de kaynak kullanımı, atık üretimi ve karbon emisyonları açısından çevre üzerinde ciddi olumsuz etkileri bulunmaktadır. Genel olarak bu olumsuz etkiler, turizm politikaları oluşturulurken gerektiği gibi dikkate alınmamakta, hatta birçok durumda kasıtlı olarak göz ardı edilmektedir. Ekonomik faydalar uğruna doğa kurban edilmekte, bu da dünya çapında birçok sosyo-çevresel çatışmaya neden olmaktadır. Bu tez Doğu Karadeniz Yeşil Yol Projesi etrafındaki sosyo-çevresel çatışmayı değerlendirmekte ve bölgedeki paydaşların tutumlarını ortaya çıkarmayı amaçlamaktadır. Yaylalar arasındaki zorlu ve güvensiz ulaşım sorununa çözüm olarak geliştirilen Yeşil Yol Projesi, DOKA (Doğu Karadeniz Kalkınma Ajansı) tarafından "...sekiz ilin önemli yaylalarını ve turizm merkezlerini birbirine bağlayan ve bölgeye gelen yerli ve yabancı turistlerin belirlenen güzergâh boyunca güvenli konforlu bir şekilde seyahat etmesine imkan sağlayan bir turizm projesi" olarak tanımlanmaktadır (DOKAP, p.24, 2016). Ancak bu boyutta bir proje, çok fazla paydaşı olumsuz etkilemekte ve çevre adaleti prensipleri gözetilmediğinde derin ayrışmalara sebep olmaktadır. Bu da yerel düzeyde ekolojik dağılım çatışmalarına neden olmakta ve kapsayıcı, adil ve sürdürülebilir bir turizm uygulamasını engellemektedir.

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ABBREVIATIONS

Abbreviation Explanation

AKP Justice and Development Party (Adalet ve Kalkınma Partisi)

CHP Republican People's Party (Cumhuriyet Halk Partisi)

EJAtlas Global Atlas of Environmental Justice (Küresel Çevre Adaleti

Atlası)

DOKA The Eastern Black Sea Development Agency (Doğu Karadeniz

Kalkınma Ajansı

DOKAP The Eastern Black Sea Project (Doğu Karadeniz Projesi)

DOKAP RDA The Eastern Black Sea Project Regional Development

Administration (Doğu Karadeniz Kalkınma Ajansı Bölge

Kalkınma İdaresi)

DPT State Planning Organization (Devlet Planlama Teşkilatı)

HPP Hydroelectric Power Plant (Hidroelektrik Enerji Santrali)

JICA Japan International Cooperation Agency (Japonya Uluslararası

İşbirliği Ajansı)

KKDP Resource Utilization Support Premium (Kaynak Kullanımı

Destekleme Primi)

KKDPr Rural Development Support Program (Kırsal Kalkınmayı

Destekleme Programı)

MTA General Directorate of Mineral Research and Exploration (Maden

Tetkik Arama Genel Müdürlüğü)

NGO Non-governmental Organization (Sivil Toplum Örgütü)

SOP Sectoral Operational Program (Sektörel Operasyonel Program)

TEMA The Turkish Foundation for Combating Erosion Reforestation and

the Protection of Natural Habitats (Türkiye Erozyonla Mücadele,

Ağaçlandırma ve Doğal Varlıkları Koruma Vakfı)

TURKSTAT Turkish Statistical Institute (Türkiye İstatistik Kurumu)

UN United Nations (Birleşmiş Milletler)

UNWTO United Nations World Tourism Organization (Birleşmiş Milletler

Dünya Turizm Örgütü)

USA United States of America (Amerika Birleşik Devletleri)

US EPA United States Environmental Protection Agency (Amerika Birleşik

Devletleri Çevre Koruma Ajansı)

UYAP National judiciary Informatics System (Ulusal Yargı Ağı Bilişim

Sistemi)

WWF World Wide Fund for Nature (Doğal Hayatı Koruma Vakfı)

1. INTRODUCTION

Even though sustainable or eco-tourism concepts have become more prevalent in last decades, tourism sector is not owning up to environmental justice issues and there is limited number of studies, with some exceptions being Scheyvens (2002), Smith and Duffy (2003), Fennell (2006), Hultsman (1995), and Higgins-Desbiolles (2008). The United Nation World Tourism Organisation (UNWTO), founded as a specialized agency responsible for tourism of the United Nations (UN) in 2003, did not to address environmental justice aspects. Moreover, the UNWTO (2011) clearly promotes tourism as a driver of economic growth and offers leadership and support to the sector in advancing knowledge and tourism policies worldwide. In that sense, UNWTO, a nonprofit organization, supports a stance that encourages the expansion of tourism and the private sector interests behind it (Bianchi, 2011). Although sustainable tourism calls for environmental conservation and socio-economic well-being (UNWTO, 2004), it does not clearly address the issues and challenges related to the fair distribution of costs and benefits of development among stakeholders. Undoubtedly, every country wants to move their welfare conditions to higher levels, and such a rapid increase in tourism and the great economic potential creates an attractive point for many countries, including Turkey.

From past to present, tourism is seen as an important means of development in Turkey and many environmentally harmful projects are implemented in the name of developing the tourism sector (Kurdoğlu, 2015). However, it is inadequate to look at tourism just as an economic activity since it brings out different socio-environmental and cultural outcomes because of interacting factors that encourage and facilitate the movements of hundreds of millions of people between spatially diverse locations and environments (Holden, 2016). Overlooking the positive and negative pressures is not possible of this mobility in economic, cultural and natural environments. Regions like the North Eastern Black Sea Region with a high level of natural or cultural heritage or a combination of both are the most demanded and unfortunately most destroyed places for various purposes like tourism, having disproportionate impacts on different groups in the society. At this point, there is necessity to re-investigate national tourism policies and documents with respect to the environmental justice issue. It is purposed to put forward a comprehensive theoretical study that discuss the two topics tourism and environmental justice through Green Road Project. Thus, more sustainable tourism policies and plans considering ecosystem services can be developed.

The main purpose of this research is to investigate the environmental justice conflict around the Green Road Project in Eastern Black Sea Region in Turkey, caused by impacts of tourism policies

and practices in economic, social and environmental context. Due to the nature of the problem at hand, this thesis brings together more than one field and hence requires an interdisciplinary research process.

Within the scope of this thesis, I first made a detailed literature review where I laid out the theoretical framework of the research. This review investigates the tourism-environment relationship and the environmental justice (EJ) concept in the context of tourism practices. Following the literature review, I have identified the actors and stakeholders relevant for my research following the stakeholder definitions of UNWTO (2013). I gathered information about the region and the project by conducting two pilot interviews. Then I collected data from secondary sources which includes the arguments and alternatives of the stakeholders regarding the Green Road Project. For this purpose, in addition to previously published articles, I reviewed newspaper articles, social media platforms, videos and all kind of other relevant documents that can include arguments by using the keyword search method. Then, I categorized these collected arguments according to the environmental justice framework that I determined in the literature review section. For better assessment of the findings and impacts, I made seven in-depth interviews with accessible stakeholders and I examined them to support some missing parts of the previous document analysiss.

In conclusion, I found out that there are two main camps of stakeholders when it comes to the Green Road project. While arguments of opponents (local residents, civil society, opposition parties and others) concentrate largely on ecological distribution, participation and recognition dimensions, arguments of the proponents mainly focus on the economic distribution dimension. One of the main sources of conflict at hand seems to be the absence of participation and recognition of particular stakeholders. I hope that this study will be helpful for policy makers in generating tourism policies aware of environmental justice and good governance principles and that they will be useful for developing more sustainable tourism alternatives that takes the rights of all stakeholders and ecosystems into consideration.

The thesis consists of seven chapters. This introduction is followed by a detailed literature review chapter which focuses first on the relationship between tourism and environment, and than tourism and environmental justice. In order to lay out a background for the Green Road Project, the third chapter focuses primarily on Turkey and investigates the tourism policies and strategies in Turkey from past to the present by reviewing development plans, tourism action plans and other relevant literature. In the fourth chapter, the Green Road project is explained in detail with its historical development and the methodology and materials of the research are presented thouroughly where

stakeholders (and their arguments) are determined, leading to the examination of the Green Road Project through the mapping of arguments. This is followed first by the results chapter where a detailed discourse analysis is presented, supported by the finding of the in-depth interviews and then an overall discussion chapter where I address the important points and provide recommendations. The last section concludes the thesis.

2. LITERATURE REVIEW

2.1. Tourism and Environment

Tourism and the environment have a two-way dynamic and interactive relationship. It is fluid and changing, containing negatives and problems as well as positives and contributions. First of all, all tourism activities are directly dependent on the infrastructures, facilities, and complimentary services of the destination. In addition to this, economic, social, and environmental assets and capitals in the destination shape tourism activities directly (Demir and Demir, 2004 p.95). Among these, environmental assets, natural resources and ecosystem services are used as main resources in tourism practices.

For example, while the provision of fresh water for drinking or using is precondition for all types of tourism, natural environments like coastlines, forests, mountains, and biodiversity are very important to the attraction potential of most tourism destinations. Hence, as Gössling and Hall (2017) also put forward, successful tourism practices rely heavily on stable and favorable environmental conditions. Considering these, it would not be wrong to say that the sustainability of the tourism industry depends on the protection and improvement of environmental resources. It seems a bit contradictory to define such an environmentally dependent sector as "environmentally sensitive" as mentioned above. Hence, to have better understanding about this complex relationship ridden with contradictions, some concepts related to tourism and its historical development background should be clarified.

Contrary to the general perceptions, it would be inadequate to reduce the definition of tourism only into the past, present and future mobilities related to the vacations of people. This is because tourism brings out different outcomes because of interacting factors that encourage and facilitate the movements of hundreds of millions of people between spatially diverse locations and environments (Holden, 2016). The economic development combined with political reforms in the world (UNWTO, 2015) have made the right to travel possible for more people and this mobility in point is constantly and drastically increasing from past to present. This observable mobility of people between places is called "hyper-mobility" (Holden, 2016) and is supported by statistical measurement. According to UNWTO, the recorded number of international arrivals (to the nearest million) in 1950 was 25 million, in 1980 this had risen to 278 million, by 1995 527 million, by 2000 it had reached 687 million, 1,113 million by 2014 and by 2030 it is projected to be 1,800 million (UNWTO, 2015). As it is seen,

tourism is a high volume "industry", and this causes pressure upon the environment and resources, including land, water and biodiversity. These mass tourism movements and practices have crucial environmental consequences and these consequences have become too serious to ignore. These can be exemplified as the destruction of natural beauties on a local scale, and greenhouse gas emissions from transportation and intensive energy consumption on a global scale.

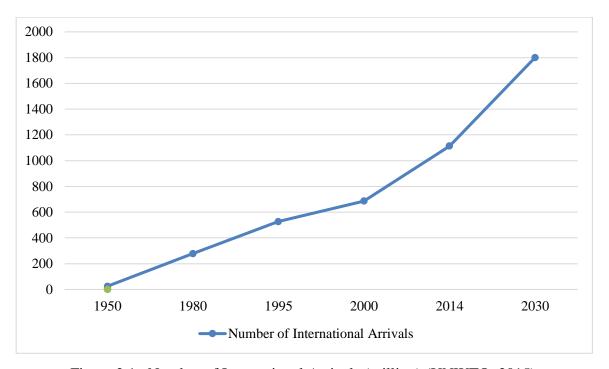


Figure 2.1. Number of International Arrivals (million) (UNWTO, 2015).

Before probing the relationship between environment and tourism and examining the impacts, it is necessary to comprehend what tourism is and how it progresses. Even though some concepts like leisure, traveling, entertainment and hospitality are associated with tourism directly, there is no consensus in the definition of tourism between researchers from different fields (Netto, 2009). When looking at the literature, later definitions seem to be criticizing previous ones and often tried to improve and correct their deficiencies. Even so, a more precise definition is important for various purposes. Burkart and Medlik (1974, p.39) have defined these purposes as study, statistical, administrative and legislation, and industrial, as follows:

"First, for purposes of study: in order to examine a phenomenon, systematically, it is necessary to define what it covers'. Secondly, for statistical purposes: when a phenomenon is measured, it must be defined; in practice available techniques of measurement frequently define what is measured. Thirdly, for legislative and administrative purposes: legislation may apply to some activities and not to others. Fourthly, for industrial purposes: particular economic activities may give rise to market studies and provide the vases for the formation of industrial organizations."

First of all, the most common definition is proposed by the United Nations World Tourism Organization (1991) as follows: "Tourism comprises the activities of persons traveling to and staying in places outside their usual environment for not more than one consecutive year for leisure, business or other purposes." It is a technical definition and does not give conceptual aspects. On the other hand, it is adopted by many different countries and organizations, and it is accepted as official definition of tourism. Since this definition sets a time limit, it becomes easier to determine what activities are involved in the tourism definition. Put it differently, tourism is a whole activity which includes some stakeholders, and these stakeholders interact with each other because of mobility. This definition of the World Tourism Organization draws a rudimentary picture of stakeholders of tourism and interaction between them. Nowadays, the consequences of these interactions are defined as "impacts of tourism" and categorized into three main types. These are, economic, socio-cultural and environmental. However, Mathieson and Wall (1982) have pointed out the impacts of tourism on the destination environment with their definition. They have described tourism as a study of people away from their usual habitat, of facilities which meet all types of needs of travelers, and of the impacts that they have on the economic, socio-cultural and environmental well-being of the hosts in a destination. Although not our focus I would like to state, since this definition emphasizes that tourism has a human behavior dimension, it is related to other disciplines like sociology and psychology.

Another definition remarking the "function" of the environment to meet the needs of tourists who are far from their usual habitats belongs to the Bull (1991) and he suggests that tourism is a human activity which encompasses human behavior, use of resources, and interaction with other people, economies and environments. This definition supports the argument which says that natural and environmental resources are centered around tourism activities and clarifies the strong relationship between them. On the other hand, potential natural resources and biodiversity makes suitable use of tourism for development and economic contribution in especially developing countries (Holden, 2008).

From an industrial perspective, other problems related to the definition come into sight. Lickorish and Jenkins (1997, p.1) have argued that tourism can not be an industry since it does not have the usual production process like other industries. In addition to this, they have stated that because of the vague and dispersed nature of tourism, it is hard to evaluate its impact upon the economy compared to other sectors (Lickorish and Jenkins, 1997). Holden (2008) expressed that the most important difference of tourism related to other sectors is "consumed in places of production". Murphy (1985), one of the most prominent tourism academicians, carries the subject to the radical side and states that

tourism is an industry which actually does not exist because it does not produce distinct products (Murphy, 1985).

Tourism industry, compared to the other industries, is totally different because it does not provide an identifiable product to the exact type of customer. At this point, "tourism industry" refers to a combination of different businesses and organizations which serve tourists (Holden, 2008:7). In addition to this, the tourism industry consists of not only business enterprises, but also environments and societies. Gun (1994) has argued that tourism should be seen as a system that every part of it is linked to and is affected by the other parts and no individual does have a complete control on it. Because of that, it can be said that every decision and action taken has an impact on other components of tourism. Going back to the argument by Lickorish and Jenkins (1997), it would not be wrong to say that in a destination in which tourism is developed, it is not easy to determine the contribution of tourism to environmental problems occurring in the destination. This case of various and distinct definitions illustrates that tourism is very complex. Tourism is a combination of different dynamics like economic processes, transformations in environments and cultures of locals and also tourists. Because it is difficult to consider all these dynamics at the same time, their consequences are just as complex to examine. Beyond just recreational and financial activity, tourism involves participation of various stakeholders, including national governments, the tourism industry and local communities, all of whom will have their own interests in and expectations of tourism (Holden, 2008:2).

First of all, because of the reliance of tourism upon the environmental and cultural resources, understanding how the perception upon the environment has changed historically is of great importance in understanding the tourism-environment relationship. After the Second World War, since countries have focused on restructuring their economies, environmental concerns have not been prioritized by the societies (Holden, 2008). However, in the second half of twentieth century, especially, with some tragic cases, environmental consequences of these rapid economic developments have started to become more visible. Congruently, at the end of the 20th century, with the excessive expansion of the volume of international tourism, the environmental effects of tourism began to come to the fore.

The first and major environmental disaster, Torrey Canyon, is an oil-tanker accident leading to public indignation in 1967. This case has caused a massive oil release (approximately 100,000 tons) on to the south-west coast of England (Cowan, 1968; Grill, 1967). In the same year, another oil spill occurred near Santa Barbara and released millions of tonnes of crude oil. In 1969, River Rhine, which provides millions of Europeans' drinking water, was endangered by toxins leakage. These cases are

remarkable examples highlighting the environmental risks of increasing living standards (Dalton, 1993). Another important breakup occurred with the Silent Spring of Rachel Carson in 1962. This book had an important impact on society to the serious detriment of the environment of industrialized farming. Even though the economic growth and industrialization have been blamed with the drastic environmental costs, tourism had a narrow escape from the arrows of criticism for a while and it has been defined as "smokeless industry" because of its "relative" sustainability in the environmental context despite some dissenting opinions (Milne, 1988; Mishan, 1969). In 1972, the publishing of the report "Limits to Growth: A Report for the Club of Rome Project" which revealed disastrous consequences of environmental pollution had led to increasing concern of society on environmental issues (Meadows et al., 1972). Parallel to this, while tourism has expanded into new destinations, its allegedly harmless relationship with the environment has become more suspicious during 1970's (Holden, 2008). Negative impacts caused by tourism, like loss of natural landscape, pollution, destruction of flora and fauna, have become visible in academic literature (Turner and Ash, 1975; Goldsmith, 1974). In their publication Golden Hordes, Turner and Ash (1975) described tourism as an "invasion from highly developed metropolitan centers to "uncivilized" environments" and they have stated that tourism should be questioned seriously.

In 1980's, with the backing of the media, environmental issues became more popular among societies. However, in this decade, despite all problems and questions, tourism was seen as an adequate formula for economic development for developing countries including Turkey. On the other hand, with the excessive development of tourism destinations, the voices of dissatisfaction with the fact that the region lost its originality and could not meet some basic human needs standards began to rise. According to the Barke and Towner (1996), the perceived attractiveness of the destinations are reduced by environmental degradation and poor image combined with overcrowding, low safety & hygiene standards, cheap accommodation and catering facilities. Thus, the destructive side of tourism began to emerge.

At the end of 1990's, green political routes became more visible in governments like Germany, France, Italy and Finland (Bowcott et al., 1999). Beginning of this century, it was argued that due to its high carbon intensity and continuing growth, tourism constitutes a growing part of the world's greenhouse gas emissions (Lenzen et al., 2018). This debate indicates that environmental responsibility does not belong just to the tourism industry, it also belongs to the tourism consumers. In short, except for small differences, there is a tourism and environment relationship that shows parallelism with attitude to the environment of society.

Now that the relationship between environment and tourism is clearer, it would be possible to proceed through its effects in an easier manner, in order to better understand how the existence of tourism has consequences. Holden (2008) handled the environmental impacts of tourism into three major categories which are natural resource usage, behavioral considerations towards environment and pollution. This categorization will clarify the impacts with the help of examples.

Tourism has different stakeholders: the tourism industry, local people, government agencies and also tourists. These stakeholders aim to get different benefits from the natural environment. At this point, a different issue which points out the accessibility, distribution, and future of environmental resources occurs (Hardin, 1968). The natural environment used for tourism, like oceans, beaches, corals, atmospheres, mountains etc., is defined as Common Pool Resources (CPR) in environmental studies literature (Ostrom et al., 1994). These were associated with exclusion, which is impractical and very costly and exploitation causing devoiding of one person since the other exploit the resource (Ostrom et al., 1999). From this perspective, tourism may create competition between stakeholders in the context of resource usage, as examples support. According to Friends of Earth (1997), major international airports, such as Heathrow in London, use an excessive amount of land area which is equal to 320 kilometers of three-lane highways. Briguglio ve Briguglio (1996) states that this amount of land loss in airport development can create food import reliance to meet the local needs in small developing states. Holden (2008) approaches this issue in a different way and states that tourism development in a destination means denial of other economic activity forms, which is called by economists as "opportunity cost". In addition to this overdependence on tourism brings overuse of natural resources (Holden, 2008). Looking at another example, Salem (1995) presents a study which reveals that the amount of water consumed by 100 luxury hotels for just 55 days is equal to the water used by 100 rural farmers for three years and urban families for two years. From an environmental justice perspective, the followin question comes to the fore: If the resources (such as water) are limited, who will use them: Wealthy tourists or poor locals?

The other category, affecting the impacts directly, is human behavior towards the environment, since locals and tourists are an important part of the tourism system. Duffus and Dearden (1990) remark that the type of tourism activity and level of tourism development are closely related to the extent of tourism impacts on the natural environment. In their study, Shackley (1996) revealed that animals' hunting activity decreased when they are surrounded by vehicles. In addition to this, there are some studies which show that human activities disturb and affect the feeding pattern of the birds and also tourists can transmit the diseases to them and other species (Buckley, 2004; Muehlenbein et a., 2010). Human originated impacts disrupt animal communication and cause disorders in their

territorial behaviors (Buckley, 2009; Buckley 2004; Beale & Monaghan, 2004; Preisler et al., 2006). Not only animals, but also plants are under the influence of this situation. However, it should be added that, although tourism has destructive impacts on wildlife, the other economic activities taking place instead of tourism, such as agriculture, urban expansion, mining etc., threaten the habitats and natural environment, as well (Shackley, 1996).

Last but not least, pollution is another category of tourism impacts. Although sometimes the sources of pollution are difficult to determine, Holden (2008) sees tourism as an important contributor to pollution and divides pollution into four categories in the tourism context, which are water, air, noise and aesthetics. Locally, tourism contributes to the pollution in water, air, noise and visual and physical disturbances to animals and plants, but also contributes to the global pollution related to greenhouse gas emissions and fuel consumption (Liddle, 1997).

Travelling, in water sources context, means consumption of resources in the visited regions. Global average length of tourists' stay is 8.1 days, and each tourist consumes approximately 1,800 litres of water and it causes an increase in water consumption in the destinations (Gössling, 2006). Additionally, tourists consume more water when they stay in the destination compared to staying at home (Gössling, 2006). This is very crucial in terms of water quality, since tourism decreases in many regions related to the untreated water sewage systems. In the Mediterranean, which is a very important tourism region, there were various large facilities which disposed their sewage into the seas directly without treatment until quite recently (WWF, 2004). Even the problem of water contamination is not caused exclusively by tourism, this indicates the insufficient infrastructure which can not meet the needs of tourists and locals.

Transportation is a very significant part of tourism, which can be associated with air pollution. All types of transportation consume energy and contribute to local and global atmospheric pollution because of CO2 release. Air transport of tourists and services is the leading polluter with %80 (Gössling, 2010; Scott et al., 2010). Noise pollution is another factor which can have detrimental impacts on the environment. Tourism is an industry that creates noise disturbance (Barthelmess & Brooks, 2010), and this is experienced by all parts of the environment. For example, building hotels and other construction activities generates noise pollution (Briguglio and Briguglio, 1996). Moreover, the most important noise pollution contributor related to tourism is air traffic (Mieczkowski, 1995). In general, tourism development prioritizes maximizing profits and ignores the visual and aesthetics concerns. Burac (1996) describe the tourism facilities in Guadeloupe and Martinique Islands as

anarchic urbanization. Tourism development creates aesthetic disturbance to native fauna (Harewood & Horrocks, 2008).

As mentioned before, the environment is used as a resource by the tourism industry for its products (Weaver, 2001; Buckley, 2003), therefore it has an impact on the environment (Buckley, 2004; Liddle, 1997). Natural environment is a direct product of about a fifth of the tourism industry (Buckley, 2009). The components of the tourism travel industry, such as infrastructure, transportation, accommodation, entertainment activities or catering, are the largest nature-based subsectors as shown by economic expenditure indicators (Moss, 2006). This section aims to explain this relationship a little more systematically so that some concepts will be clarified in the context of the special topic of this thesis.

Regarding the study of Buckley (2011), tourism can be categorized into four types according to how it uses nature. The first of these is considered as mass or mainstream in tourism research literature. Beach tourism, ski tourism and marina industry can be examples and, in these cases, the natural environment is the main area where tourism activities take place. In addition to this, these types of tourism require extensive accommodation, good and sufficient infrastructure which impact the environment directly, while their existence depends on the stability of terrain and climate conditions, in other words, nature. Moreover, although many tourism enterprises are privately owned, many of these lands are public land which is allocated for forestry or conservation (Buckley, 2011).

The other three categories, consumptive, adventure, and non-consumptive can include a large number of tourists like mass tourism, but compared to it, there is less infrastructure. Consumptive nature-based tourism includes recreational hunting or fishing activities (Buckley, 2010; Loveridge et al. 2007). Adventure tourism refers to the excitement-based activities which use the natural environment as outdoor, especially particular landscapes (Buckley, 2010). Lastly, non-consumptive tourism means the smooth activities like watching animals, plants or enjoying the scenery (Buckley, 2010; Newsome et al. 2002). National parks, wilderness areas, and other public lands and oceans are involved in this type of tourism and they have high volume visitor numbers, including tourists and also residents (Hendee et al. 2006; Cater & Cater 2007).

In short, it can be a good start in understanding the depth of the relationship. The economic values of ecosystems and biodiversities are frequently calculated over tourism revenues (Buckley, 2010; Kumar, 2010; Constanza et al. 1997). On the other hand, there are a limited number of studies examining the relationship between environmental damage and economic loss (Andersson, 2007).

Tourism is overloading nature, but nature is also changing. Ski seasons are shortening, the coastal areas are affected by storms, corals are dying from ocean acidity, and the risk of forest fires is increasing day by day (Hall, 2006). Climate change affects the attractiveness of tourism destinations for different activities for different times of a year.

While examining the relationship between tourism and the environment, another important point is the land tenure. Even the systems of land tenure vary to countries, it is basically similar. It shapes nature-based tourism products and helps to regulate their impacts on the environment. From the tourism aspect, land tenure can be categorized into main four, and all of them have various advantages or disadvantages in terms of commercial tourism operations. These are protected areas like national parks, public lands, private freehold or long-term leasehold, communal titles and community owned lands (Buckley, 2011). First one, protected areas, are the natural ecosystems where tourism operations are restricted and large-scale private accommodation or development of infrastructure is not allowed (Buckley, 2010), in general just low impact activities can have permissions (Buckley, 2003). Tourism enterprises in national parks have competitive commercial advantages, since they have potential clients in publicly funded tourism destinations (Buckley, 2009). Because of restrictions, they are not exposed to encroachment of other industries (Buckley, 2009). Differently from protected areas, public lands have less restrictions, parallel to this, are less attractive. Additionally, since they are less funded publicly, infrastructure in public lands are underdeveloped. On the other hand, fewer restrictions make public land open to encroachment from various industries (Ward, 2003; Wang & Buckley, 2010). Compared to the public lands, private lands have a high cost disadvantage, since it includes its capital cost and also capital and maintenance costs of infrastructure (Buckley, 2010; Cousins et al., 2008). They are not publicly funded. However, because of less restrictions, they can be preferred by tourism operators to minimize restrictions (Buckley, 2009).

2.2. Tourism and Environmental Justice

With the developing technology, fast increasing population and deep industrialized world, the environmental change has become a global issue today. Although environmental issues concern the whole world equally, it is not possible to say that there is an equal distribution of environmental benefits and environmental hazards. At this point, the concept of environmental justice comes to the fore. While there are many distinct definitions, first formal definition of Environmental justice (EJ) was done by U.S. Environmental Protection Agency (EPA) as "the meaningful participation of all people and the fair treatment to them regardless of their race, color, national origin or income, in the development and implementation of environmental laws, regulations and policies" (U.S. EPA, 1992).

EJ studies have started to emerge as a literature that reveals the unequal effects of environmental pollution on people in the context of social classes. Many studies (Brulle & Pellow 2006; 2005; Roberts & Toffolon-Weiss, 2001) show that minorities, indigenous peoples and the poor are more exposed to environmental burden and damages.

Many EJ researchers point Warren in North Carolina as the roots of EJ movements since environmental racism issues emerged there (Bullard, 2000; Pellow & Brulle, 2005; Roberts & Toffolon-Weiss, 2001). In Warren County in 1982, large industrial waste were present in the area where the African-Americans live in and this situation created a local reaction and this became a symbol of environmental justice movements. After protests, environmentalists realized that socially and economically disadvantaged and vulnerable communities are more likely to face ecological risks, endangering the lives and health of people, especially of African and Latino descent (Mohai et al., 2018). Therefore, this case was seen as environmental racism. Environmental racism can occur as practice or policy that exposes (whether willingly or unwillingly) individuals, groups or communities to environmental damage, because of their race, gender, class or color (Bullard, 1996). Like other types of racism, it caused a great movement fighting against it. This gap between people who get benefits or hazards, attracted the attention of policy makers and academics who are interested in this issue.

Over time, the literature has deepened and renewed and Bullard (1996, p.493) introduced a new definition of environmental justice, which points directly to environmental racism; "equal protection and right to environmental and public health laws and regulations for all communities and people". Additionally, the definition of the environment in this context was extended as "where we live, work, play, go to school, physical and natural world" (Santana, p. 63, 2002). Thus, the scope of environmental justice has expanded by integrating the cultural environment into this definition (Schweizer, 1999). With the effect of studies, research and political moves, definitions changed and developed day by day. Fair treatment to all peopla requires that any portion of the population not receive disproportionate pollution shares from industrial, commercial activities and administrative problems due to policy or economic weakness (U.S. EPA, 2007).

To summarize, the historical background based on EJ definitions, studies and critical turning points shows that the issue has been on the rise since the 1980s and is directly related to socioeconomic and cultural issues. EJ contains every component which has a relationship with nature. Also, controversy still continues, as it is an extremely complex issue and involves many actors. There is no consensus yet and it is not known where the solution will come from and which actors will be

included. The other dimension of the discussions is seen as the detection of environmental injustices. Although there are different opinions on this issue, it can be categorized as economic, sociopolitical or racial discrimination statements (Mohai & Saha, 2007).

Economic explanation argues that the industry does not deliberately discriminate against certain parts of communities. In this view, the industry develops in regions where the cost is low due to their profit increasing policy. Weak part of the community may also live in these regions incidentally. On the other hand, weak communities may be located in the relatively inexpensive region where the industry exists. In this sense, environmental inequality may increase even more.

The sociopolitical explanation argues that industries and governments chose the path where they will face little resistance when polluting the environment (Saha & Mohai, 2005). Industrial companies predict that many communities will oppose pollution and they want to avoid effective opposition. Effective opposition can be regarded as abundant resources and political influences. However, poor and minority groups become easy targets because they do not have these conditions (Saha & Mohai, 2005). The pollutant industry has established in poorer regions, as rich and influential communities can be well opponents. Thus, over time, the socioeconomic gap in the distribution of these facilities has become larger.

From racial perspective, when we consider the emergence of environmental justice, more disadvantaged people, minorities and people of color are exposed to more abuse. The image of people of African and Latino and the other generally is associated with "barbarism, filth, filth and pollution and this point to a certain form of racism (Mohai, Pellow, and Roberts, 2009). This raises many concerns such as culture, power relations, and rights.

We will consider the environmental justice issue, in the context of the tourism industry, which has a very close relationship with the environment. The relationship between tourism and the environment is a significant research topic that has been discussed for a long time. While some studies state that tourism practices have positive effects on the environment (Fennell & Weaver, 2005; Mieczkowski, 1995), many studies focus on their negative effects (Croall, 1995; Keefe, 1995; Sparrowhawk & Holden, 1999; Tyler, 1989). Regardless of positive or negative ways, the environment and tourism are two factors that have a very close relationship. However, most of these studies are focused on aggregated effects. Moreover, studies related to racial or class distribution of tourism impacts (benefits and costs) are insufficient (Lee, & Jamal, 2008). In order to better understand this relationship, I can give an example by considering two very fundamental tourism

stakeholders; tourists and locals. In a tourism destination, tourists are allowed to enjoy and experience tourist areas and destinations, while locals have limited access to these areas and are sometimes required to evacuate (Camargo & Jamal, 2007).

The concept of tourism and injustice is generally addressed in two ways. The first one is related to the forms of tourism which are harshly exploitative like sex tourism and cultural tourism (Whyte et al., 2011). The second one involves forms of tourism that destroy the places where people live, work and play (Tedmanson et al., 2013). While the first source of injustice is very important in terms of human rights, in the context of this thesis, the second source is more relevant to environmental justice (EJ) research and hence I will elaborate on that.

Although environmental justice is not a subject that is emphasized in the tourism literature, tourism practices have a high potential for conflict between stakeholders. Environmental Justice Atlas (EJAtlas) a project documenting conflicts around environmental issues and trying to voice communities struggling for environmental justice from around the world (Martinez-Alier, 2021). EJAtlas maps conflicts across ten major categories, including Tourism Recreation. Under Tourism Recreation category, 82 EJ cases have been determined all over the world. While 41 cases are qualified as "failure" of these cases, currently in the map, 16 have been qualified as "successes". The remaining 25 cases are categorized as "not sure". In addition, EJAtlas has labeled seventeen of these conflicts as "high intensity" (widespread, mass mobilization, violance, arrest, etc.), thirty-eight as "medium intensity" (street protests, visible mobilization), twenty-five as "low intensity" (some local organizing) and two of them as "latent" (no visible organizing at the moment). With the help of reallife examples providing by the EJAtlas, tourism and environmental justice relation becomes more meaningful regarding my thesis.

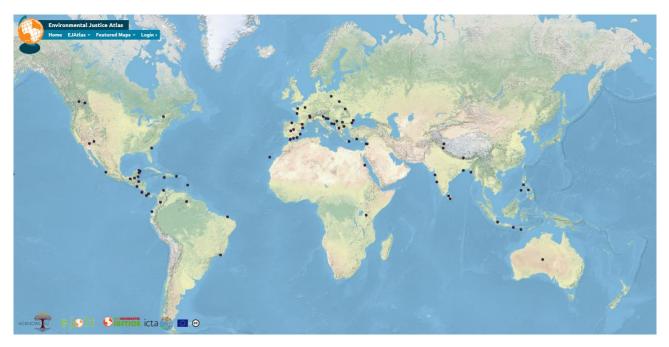


Figure 2.2. Tourism and recreation conflicts in Environmental Justice Atlas (Source: ejatlas.org)

Tourism evolves by giving importance to the sustainability of resources and destinations. In this sense, we use the concept of tourism as sustainable tourism. Sustainable tourism requires environmental protection, social and economic well-being of people (UNWTO, 2004), but as mentioned above, it can be said that there is problem in the issue of fair distribution of benefits and hazards. Although environmental justice is a concept that attracts great attention, it has not existed in tourism discourses except for a few limited studies. Camargo and Jamal (2007) figured out studies which point to environmental injustice in tourism, such as Akama (1999) and Floyd & Johnson (2002) etc.

Tourism is a commercial practice that should have a lot of ethical concerns, because it contains various crucial components such as environment, culture and people. It is not possible to have an ethical tourism practice if the issue of environmental justice is ignored. Like other industries, in tourism, strong parts of communities take advantage of benefits and opportunities, while weak ones are exposed to hazards and pollutants. But when we look at the literature, unfortunately, there is not enough investigation that focuses on environmental justice discourse and tourism together. Concepts such as sustainable tourism that point to environmental concerns have led to minor achievements. A broader environmental discourse of justice is also needed in tourism.

In the context of this study, it is aimed to understand the relationship between tourism and environmental justice through an example. As mentioned before, there is a complex relationship between tourism and the environment, and tourism is a sector that uses environment as a resource.

This complex relationship has many impacts on the environment which affect some stakeholders directly or indirectly. How these impacts are distributed is also the focus of environmental justice studies. Rawls (2009) defined the justice as the *distribution of goods* in a society, and the principles by which to distribute those goods. However, understanding the issues behind unfair distribution is important to clarify the concept of environmental justice and the underlying causes are not understood, the solution of maldistribution will not be possible (Schlosberg, 2007). In this sense, Young (1990), Fraser (1997), Honneth (1995), argue that justice must point the process that construct maldistribution and they focus on *individual and social* recognition as the key elements of attaining justice. In absence of recognition, emerge as forms of discrimination, oppressing and harming at both the individual and community level (Schlosberg, 2007). Fraser (1997) determined the third leg of triad that includes distribution and recognition as participation. Additionally, participation is seen as a key political capability, neccessary for ensuring functioning (Nussbaum, XX, Sen, XX), and it is related to the participation ability of individuals and communities in the decision-making processes. Going back to the Saha & Mohai's (2009) argument, the ability of individuals and communities to affect a policy decision is directly related to the resistance against polluting environment.

Considering all, I choose three environmental justice dimensions (Schlosberg, 2007) since they are observable and can address the needs scope of my thesis. These are defined as follows:

- Distribution:
 - *Economic distribution*: The distribution of economic benefits, opportunities, risks and costs across individuals or communities in a society, or across generations over time (O'Connor, 2002)
 - *Ecological distribution*: The distribution of hazards or pollution due to increased social metabolism (Martinez-Alier, 2009)
- *Participation*: The means to be part of a policy-making process and to be one the decision-makers (i.e. having the power to affect the final decision) (Arnstein, 1969)
- *Recognition*: The ability to consider and recognise the rights of other human beings and non-human beings (Honneth, 2001)

The Green Road Project, which I will examine in detail in the following parts, is a major tourism project that will have many impacts on the environment. This extensive project also concerns many stakeholders directly or indirectly. Therefore, this issue has a high potential to make an issue of environmental justice. Building my research on this theoretical framework, I will discuss the Green Road Project in the context of environmental justice.

3. TOURISM POLICIES IN TURKEY AND THEIR RELATION TO ENVIRONMENT AND ENVIRONMENTAL JUSTICE

Public policies can be determined as a combination of actions, commitments, and decisions aimed at achieving a particular outcome or benefit in the public interest (Luke, 1998). The tourism policy; in accordance with the economic policy of a country, can be expressed as the whole of the measures and interventions taken by public administrations in order to achieve the targeted benefits in the economic, social, and cultural fields from tourism activities (Olalı, 1990). In addition to this, Olalı (1982) has argued that one of the tourism policies' targets is conservation of the environmental resources. The rapid growth in both international and domestic tourism practices causes dramatic pressure upon natural environments, resources including land, water, and biodiversity. That is to say, the degree to which its relationship with the environment is held to be positive or negative, depends on how tourism is understood, planned, and managed.

In the following part, tourism policies will be examined and discussed from the environmental perspective. When examining the literature in the context of tourism policies' development process in the post-republic Turkish economy, it is seen there are two main periods; pre-planned period and planned period. These two periods can be categorized into different sub-periods, however, the change in Turkey's economic policies after 1980's has also been reflected in tourism policies. The developments after 1960 will be evaluated within the scope of the planned period which covers the foundation of the State Planning Organization. However, since development planning lost its institutional importance in the post-1980 period with the decisions of January 24, this period will be examined in another part, titled as "After 1980" (Soyak, 2009, ss.56-57).

3.1. Pre-planned Period

The years of 1923-1950 were spent in war and economic crisis in the world. The Republic of Turkey, which was at the foundation stage, had many internal and external economic, political and social problems to solve, which caused these years to be inefficient in the context of tourism. However, tourism policies and incentives have taken place gradually from the establishment of the Turkish Republic as the other reformer steps. The Tourism Office was founded in 1934. And then Tourism Directorate within the Ministry of Economy was established in 1937 and it shows that Turkish tourism has started to develop gradually in institutional sense. In 1939, the Directorate of

Tourism was transformed into the Department of Tourism under the Ministry of Trade. Institutional developments continued in 1949 and the General Directorate of Press was transformed into the General Directorate of Press and Tourism. In 1957, the General Directorate of Press and Tourism was evolved into a ministry, based on the idea that propaganda activities would be more active in a ministry service. After six years, in 1963, the Ministry of Tourism and Promotion of Turkey was established. In 1983, the Ministry of Promotion and Tourism merged with the Ministry of Culture. Its name was changed as the Ministry of Culture and Tourism of the Republic of Turkey. Moreover, the Turkish Tourism Bank was founded in 1954 to finance tourism investments, then was named the Turkish Republic Tourism Bank in 1960. In addition to these financial supporting moves, there are many different laws for incentives for the tourism industry. Institutions Incentive Law and Tourism Loan Fund Incentive Law in 1950, Tourism Industry Promotion Law numbered 6086 in 1953 and Foreign Capital Incentive Law and Tourism Cooperation Regulation numbered 6224 in 1954 can be some examples which show the place that tourism takes in policies.

Compared to the planned period, it cannot be evaluated successfully in context of tourism policies and activities, but when considering the turbulent political conjuncture of the world and also Turkey this inability to progress looks like a predictable result. On the other hand, incentives and regulations introduced in this period show that tourism has been an important sector for the country from the very beginning. In addition to these, it has formed an important basis for the institutionalization of tourism and its involvement in the state organization. When tourism policies are examined from an environmental perspective, it is not wrong to say that policies do not focus on environmental issues and the impacts of tourism on the environment. Steps taken and policies made on behalf of tourism aimed at economic progress and development of tourism.

3.2. Planned Period

When examining the literature, the planned economy period started with the foundation of the State Planning Organization (SPO) in 1960 and ended up with the decisions of January 24, 1980 when Turkish economy entered into a long period of liberalisation (Soyak, 2005, s. 58.). In the following part, since tourism is part of the plans, the first four five-year development plans will be examined in the context of tourism from an environmental perspective. These plans are accepted as imperative for the public and guiding for the private sector (Akdağ, Güler ve Çakıcı, 2019: 20), therefore they are significant tools to shape how tourism progresses and also to understand how it is approached strategically.

3.2.1. Before 1980

In the first five-year development plan (1963-1967), tourism was treated as a crucial economic development tool in order to finance the national budget deficit (First Five-Year Development Plan, 1968 p.425). The main principle stated is to make the necessary investments and incentives immediately to attract the increasing global tourism movements (First Five-Year Development Plan, 1968 p.425). It can be said that increasing the number of tourists and their duration of stay is the main goal of this development plan, therefore, the promotion of tourism has been prioritized. It is aimed to increase the number of tourists approximately 20% with the help of policies and investments (First Five-Year Development Plan, 1968 p.426). In this way, establishments of resorts and pilot projects, developments of transportation, and establishment of the national parks were expressed as essential projects to meet these goals (First Five-Year Development Plan, 1968 p.427). In the directions of these principles and objectives, facilitation of loans was highlighted and the necessity of establishment of an organization to manage all tourism affairs of Turkey in the best way with the necessary authorities and opportunities (First Five-Year Development Plan, 1968 p.428). Subsequently, the Ministry of Tourism and Promotion was founded in 1963. One of the prominent tourism measures in the development plan is the decision to change the provisions in laws and regulations that will prevent the development of tourism (First Five-Year Development Plan, 1968 p.428). From this point of view, it would not be wrong to deduce how important tourism development is. Another measure that seems controversial is about legal provisions which give the necessary abilities to the relevant authorities in order to determine the use of natural values suitable for tourism and touristic purposes and to prevent speculation in such places. (First Five-Year Development Plan, 1968 p.428).

The Second Five-year Development Plan covers the first one, except for some differences. In the second plan (1968-1972), the main principle is stated as benefiting from economic, social and cultural functions of tourism and it is aimed to increase the number of tourists and development of accommodation and transportation facilities in the direction of mass tourism (Second Five-Year Development Plan, 1968 p.593). Moreover, these principles paved the way for private sector tourism investments (Second Five-Year Development Plan, 1968 p.593). Differently from the first five-year plan, the importance of considering the physical plan in a way to cover tourism priority regions (Mediterranean, Aegean and Marmara Regions) was emphasized (Second Five-Year Development Plan, 1968 p.601). Thereby, indirectly, unplanned tourism development was on the agenda. On the other hand, these regions were prioritized in historical and archaeological

conservation and restoration (Second Five-Year Development Plan, 1968 p.601). Although not environmental, it is notable for the mention of "conservation" for the first time.

Like the previous two plans, the main goal of the third development plan is to expand the volume of tourism. Tourism policies still have been driven by economic purposes. It was emphasized that the potential of tourism with the tourism investments should be concentrated in certain regions instead of spreading to the whole country (Third Five-Year Development Plan, 1973, p.615). As measures taken, the importance of physical planning is mentioned in order to prevent irregular structuring progress and land use in regions where tourism is developing rapidly (Third Five-Year Development Plan, 1973, p.619). Another significant point is the requirement of legislation that will ensure the use and protection of tourism and national park areas of the coasts benefit of society (Third Five-Year Development Plan, 1973, p.619).

In the fourth five-year development plan, tourism development based on mass tourism is the main goal. With the "Organized Tourism Regions", a slight tourism planning policy remained and policies and measures are expressed as; increasing accommodation capacity, encouraging foreign investors, increasing number of seasonal flights, ensuring a balanced distribution of tourism demand throughout the year (Fourth Five-Year Development Plan, 1968 p.432). Another item to be considered under the heading of measures is ensuring the use of sea, lake and river shores for public welfare (Fourth Five-Year Development Plan, 1968 p.432). This is an important point as it can constitute an example for the planning of environmental issues.

Looking at the development plans before 1980, it is a fact that tourism has found a place for itself since the very beginning of the planned economy. While it is stated that the natural resources of the country are suitable for tourism, rapid development could not be achieved due to the lack of infrastructure and superstructure facilities. Despite the idea of tourism development based on environmental resources (First Five-Year Development Plan, 1968 p.425), we do not find articles in the policies regarding the conservation and planning of these resources. It sounds poignant that the environment is not included in tourism policies because the relationship between tourism and environment is intimate. However, considering the historical background of the environmental concerns in these periods, since environmental awareness has not developed, deficiency of environmental perspective in the tourism policies is not astounding. Although not from an environmental perspective, this period is important for the institutionalization of tourism. As it was then called, The Ministry of Tourism and Promotion, was founded in 1963, tourism has started to

be organized in the state. By this way, points of contact were formed of the results that will arise from tourism practices.

3.2.2. Between 1980 and 2000

With the decisions of January 24, various policies have transformed the tourism industry, such as devaluation, decision on foreign investment framework decree and the decisions related to the Tourism Incentive Law numbered 2634 (Öztaş ve Karabulut, 2006, p.10-11) – one of the most significant step in the tourism development history. Moreover, the incentive given under the name of resource utilization support premium (KKDP – Kaynak Kullanımı Destekleme Primi) after 1980 brought a great development to tourism investments in this period (Soyak, 2005, p.65-66.). In 1985, tourism was included in the scope of "Sector of Special Importance in Development". The conveniences after 1980 were expressed in table 2634. Considering all these, a large investment demand has emerged in the tourism sector (Doğmuş, 2010: 53) and in this period an aggressive progress has occurred in the tourism industry.

3.2.3. After 2000

It would be appropriate to consider the post-2000 period as the period of AKP government in the context of tourism policies. It is seen that tourism is in the most important position in terms of foreign exchange income after the manufacturing industry in Turkey (Çınar and Hepaktan, 2007: 135). In 1993, the share of direct employment in tourism in total employment was 3.56%. It is seen that this rate reached 5.10% in 2001 and 6.70% in 2010 in Turkey. In addition, the share of industry in indirect employment was 8.90% in 1993, 12.76% in 2001 and 19.81% in 2010. Its share in total employment increased from 12.46 percent to 26.51 percent (TURKSTAT, 2010). When these data are considered, it is seen that the importance given to tourism has increased with the AKP period and the share of tourism in employment is gradually increasing. Moreover, the Ninth Development Plan, which is prepared by AKP, is an important indicator of how they prioritize the tourism industry.

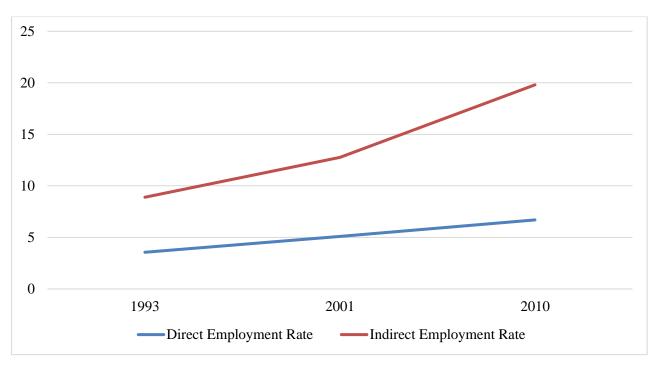


Figure 3.1. Direct and Indirect Employment Share of Tourism in Total Employment (TURKSTAT, 2010)

In 2005, tourism revenues increased from 7,1 billion dollar to 18,2 compared 2001 and during the same period, while the number of foreign tourists rose from 10.4 million to 21.1 million persons (Dokuzuncu Kalkınma Planı, 2007; p.44). With this increase in the number of tourists and foreign exchange revenues, Turkey ranks 12th in the world in terms of receiving the most tourists and 8th in revenues (Dokuzuncu Kalkınma Planı, 2007; p.35). In addition, the plan underlined the need to benefit from the potential of the country in the field of tourism (Dokuzuncu Kalkınma Planı, 2007 p.45), and for 2006, 19.6 billion dollars and for 2013, 36 billion dollars has been set as tourism revenues (Dokuzuncu Kalkınma Planı, 2007 p.55). Finally, the share of tourism within the sectoral public fixed capital investments was predicted to be 0.3 percent in 2006 and 0.5 in 2013, almost double (Dokuzuncu Kalkınma Planı, 2007 p.55). These figures in the ninth development plan is important for us to understand how tourism has peaked and tourism has come to the fore among the other sectors during the period of AKP government.

Another attempt that should be mentioned is the "Turkey Tourism Strategy 2023" document prepared by the AKP government in line with the 9th Development Plan objectives. The vision of strategy is identified as "an effort that aims at providing extensions to management and implementations of strategic planning efforts and boosting the cooperation between public and private sectors of tourism with reference to the principle of "governance" by the ministry. Parallel to the development plan, tourism strategy focuses on "tourism development" and on this

purpose, it is expressed in the document, there is an attitude that is regional, guiding rather than mandatory, dynamic rather than static (Tourism Strategy, 2023; 1). Additionally, this strategy is supported by another study called "Tourism 2007-2023 Action Plan" and it includes visions, objectives and actions aiming rapid tourism development. For example, one of the main targets of this strategy is to reach 63 million tourists and 86 billion dollars tourism revenues (Turkey Tourism Strategy Action Plan 2007-2023; 3). These policy documents are very comprehensive and address the development of tourism in many ways, both on a micro and macro scales. However, if it is looked in detail, alternative tourism is a concept that is given importance and there are various related attempts and objectives for this purpose.

On the way to the Green Road Project, alternatif tourism is a remarkable concept. There is a strategy under the heading of "tourism diversification": "To develop means for alternative tourism types led particularly by health, thermal, winter, golf, sea, ecotourism and plateau tourism, congress and expo tourism activities" (Turkey Tourism Strategy, 2023; 36) and it provides insight into tourism policies and plans performed. In this direction, "Tourism Development Zones" and "Tourism Development Corridors" appeared as new two concepts related to the development of alternative tourism and specific nine tourism development zones and seven tourism development corridors are determined. The plateau corridor is included as the 6th corridor in the document and is considered the beginning of the Green Road Project. "Tourism Development Corridors" strategy is defined as "To develop a certain route for tourism on definite themes, by rehabilitating historical and natural texture" (Turkey Tourism Strategy 2023; 51). Then tourism is described as a social movement which is ensured by transportation (Turkey Tourism Strategy 2023; 51). According to the description of "Plateau Corridor", it covers the provinces from Samsun to Hopa, which have a gorgeous number of tremendous and breath-catching landscapes and scenes. And "Plateau Corridors" actions numbered 141 and 142 states that regions with high tourism potential that can compete at local, regional, national and international levels will be determined as "Tourism Centers" and "Culture and Tourism Protection and Development Regions". Then spatial plans will be completed in order to realize a planned development and it will be aimed to develop alternative tourism types in a qualified manner in these plans (Turkey Tourism Strategy Action Plan 2007-2013; 76). Considering these, it can be said that policies focus on tourism development rather than tourism planning. In case of the development of tourism may create some requirements in the region, such as infrastructure, facilities, accommodation or transportation. The document includes an action confirming this tourism expansion policy and the structuring regarding this expansion which is called "Infrastructure Council Law". It claims that there should be developed infrastructure in areas where tourism is developing intensively (Turkey Tourism Strategy Action Plan 2007-2013; 50).

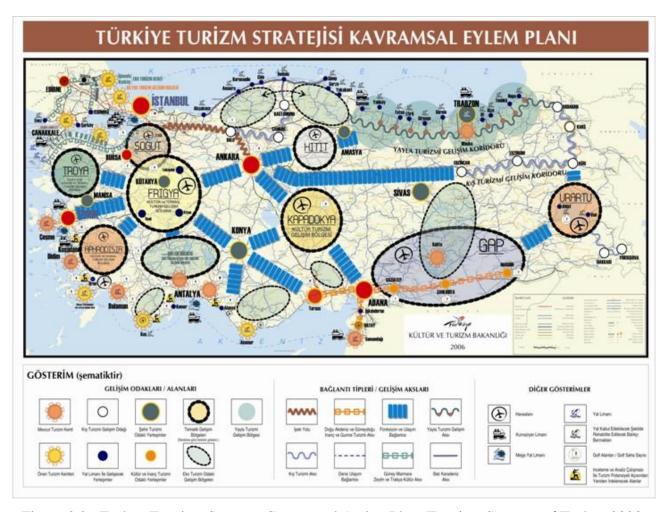


Figure 3.2. Turkey Tourism Strategy Conceptual Action Plan (Tourism Strategy of Turkey 2023, p.62-63, 2007)

Following the aggreassive tourism development plans, we have seen many local level environmental protests against tourism projects (such as enclosures of beaches and large tourism infrastructures) all around the country. While not complete, the Turkish Map of Environmental Justice reports some of the recent ones as seen in Figure 3.3. Under the "Tourism Recreation" category, five environmental justice issues have been idefined in Turkey, however the Green Road Project is not among these five conflicts. It can be seen other Tourism Recreation conflicts in Table 3.2.



Figure 3.3. Turkish map of environmental justice (Source: tr.ejatlas.org)

Table 3.1. Tourism and recreation conflicts reported in Turkish map of environmental justice (Source: tr.ejatlas.org)

Tourism and Recreation Conflicts	Description
Salda Lake	The Salda lake initiated by the project that creates environmental destruction under the name "Nation Garden" faced with pollution and desiccation, and this project encouraged the use of the lake for tourism and other purposes.
Democracy and Liberty Island (Yassıada) Hotel	Democracy and Liberty Island, or Yassıada, as it is known, is the project of transforming Yassıada into a hotel and congress center with a 65% zoning area.
Renting Gocek Coves by Tender	The certain coves in the Göcek Region of Muğla will be rented by the Ministry of Environment and Urbanization and opened for construction.
Construction of a Hotel in the Ancient City of Phaselis	A five-star hotel called "Dream Of Phaselis" is planned to be built within the borders of Beydağları Olympus National Park.
Renting Çıralı Beach	The Ministry of Environment and Urbanization Antalya Regional Commission for Conservation of Natural Assets approved the tourism facilities to be built on an area of 90 hectares on the Çıralı coast.

In conclusion, after the 2000s, with the new government, tourism has become one of the significant sectors compared to the others. Besides new concepts such as alternative tourism in the

ninth and tenth development plans, growth in tourism is the main objective. In addition, the first and very comprehensive tourism strategies and action plan document can be evidence for this objective. The seasonal and regional development of tourism establishes the main bases of these policy documents. Accordingly, it is very important to understand the national government's approach to tourism in order to understand the background of the Green Road Project. Growth and development come to the fore rather than planning and conservation in tourism. In the context of our subject, "Tourism Strategy of Turkey 2023" can be seen as the first attempt of the Green Road Project through plateaus corridor strategy.

4. THE GREEN ROAD PROJECT

4.1. Background and a short history

4.1.1. Regional Development Plans in the Eastern Black Sea and the Green Road Project

Before examining the project, it would be useful to understand the general, human and economic characteristics of the Eastern Black Sea and the history of the planning process in the region. As stated before, Turkey adopted an export-oriented industrialization strategy after 1980 and with the implementation of this strategy, the Eastern Black Sea economy declined relatively to the over economy (Morgil, 1997, p. 71). The region has fallen into a recession period, its share of national income gradually decreased and a relative decrease was observed in the industrial employment share as seen in the Figure 4.1.

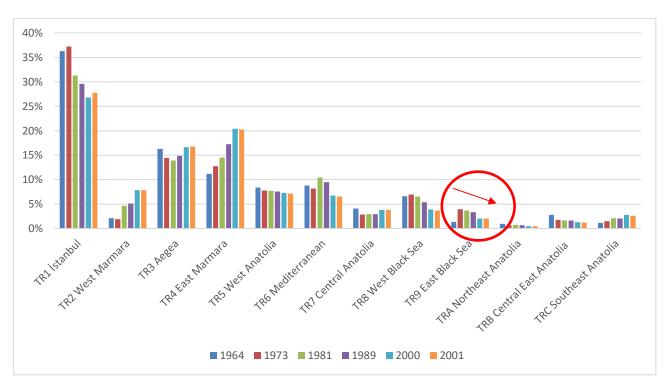


Figure 4.1. Distribution of industrial employment in NUTS 1 regions by years (Sanayi ve Teknoloji Bakanlığı, 2016)

The most important problem of the region is the weakness of the economic structure. According to the State Planning Organization, the reasons for this economic underdevelopment are;

- problems encountered in accessing foreign markets due to the undeveloped transportation infrastructure of the region and geographical distance,
- the insufficient urbanization and the inadequate use of tourism resources,
- ineffective land use and agricultural management, production being completely dependent on the production of products such as tea plant and hazelnut or grain,
- stagnation in traditional rural activities and large intra-regional differences (Five-Year Development Plan, 2000 p. 3-4).

Various policies and strategies have been put forward to ensure the socio-economic development of the Eastern Black Sea Region. The first of these studies is the Eastern Black Sea Project (DOKAP) Regional Development Plan, which was prepared in 2000 by the Undersecretariat of the State Planning Organization (DPT) and the Japan International Cooperation Agency (JICA). This first report, four main problems were identified in the DOKAP region. These are distance and access problems to developed regions, rough topography with very limited flatlands, insufficient development planning and administrative system and weakness of local governments. (Seventh Five-Year Development Plan, 2000). While the first two of these problems are region specific, the other two problems are the result of institutional structure. The DOKAP Regional Development Plan aimed to intervene in the structural problems of the Eastern Black Sea region and to evaluate its potential, but it could not be implemented. Due to the financial difficulties in the early 2000s, the lack of full participation of the stakeholders in the process and the lack of an institutional structure that directly targets the implementation of the plan locally. However, it has become an important base for the determination of the scope of the DOKAP Action Plan prepared for the years 2014-2018 and the actions to be carried out in this context (DOKAP Bölge Kalkınma Programı, 2021-2023; 12).

In the process following the Regional Development Plans, the Eastern Black Sea Project Regional Development Administration (DOKAP RDA), covering the provinces of Artvin, Giresun, Gümüşhane, Ordu, Rize, Trabzon, Bayburt and Samsun with the Decree Law No. 642 was established in 2011. The purpose of its establishment is expressed as preparing and coordinating the implementation of new action plans ensuring that the projects and activities of the relevant institutions and organizations are carried out in harmony and integrity in order to accelerate the development of the regions (DOKAP Action Plan, 2014). The number of provinces reached eleven with the addition of Tokat province in 2016 and Amasya and Çorum provinces in 2020 to the DOKAP Region, which consists of the provinces of Artvin, Bayburt, Giresun, Gümüşhane, Ordu, Rize, Samsun and Trabzon. (According to the Council of Ministers Decision No. 2016/9140, published in the Official Gazette

dated September 19, 2016, and numbered 29826, according to the Presidential Decision numbered 2538, published in the Official Gazette dated 13 May 2020 and numbered 31126.)

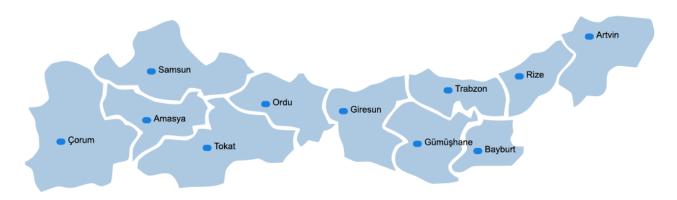


Figure 4.2. DOKAP Provinces (DOKAP, 2020)

After the plateau corridor concept has come to the agenda in Turkey Tourism Strategy, we can see the concrete steps regarding the Green Road Project in the DOKAP Action Plan 2014. In the plan, it is stated that the sea tourism of the region is limited and the tourism activities mainly focus on the ecotourism and plateaus. Considering this, the Green Road Project is deemed essential, which will connect the plateaus in the DOKAP Region from the upper elevations, in order to contribute to the region's brand equity in the field of tourism (DOKAP Eylem Planı 2014, p.41). Moreover, tourism is mentioned as the locomotive sector in the region and the project and supporting tourism investments on the project route are determined as a necessity (DOKAP Eylem Planı 2014, p.42). In addition, the Green Road Project was included in both the "Tourism and Environmental Sustainability" part and the "Infrastructure and Urban Development" part of the Development Axes section. The objectives set for the project under the heading of "tourism and environmental sustainability" are as follows:

- The "Green Road" project, which is of great importance for regional tourism, will be completed and branded as soon as possible.
- The planning process of the tourism regions on the road route will be completed in a short time and they will be made ready for private sector investments.
- The construction and improvement of tourism facilities located on the Green Road route will be supported by the Development Agencies operating in the region (DOKAP Eylem Plant 2014 p.42).

Thus, it is aimed that the region will become one of the most important tourism centers that can attract tourists in every season with diversified tourism types. In the Infrastructure and Urban Development title, the Green Road Project objectives are as follows:

- The Green Road connecting the plateaus will be completed.
- Planning processes of 14 areas located in the plateaus with tourism potential will be completed immediately and the appropriate ones will be declared as Culture and Tourism Conservation and Development Zones (DOKAP Eylem Plan 2014, p.52).

In this way, the transportation problem, which is the most important constraint in plateaus tourism, will be solved. Moreover, it can be seen that the first tourism and sustainability actions related to the green road in the Table 3.3. (DOKAP Eylem Plan 2014-2018, p60).

DOKAP ACTION PLAN (2014-2018) TOURISM AND ENVIRONMENTAL SUSTAINABILITY (TES) Description Action **Action Name** Location Responsible **Institutions Date** No Institution to Cooperate TOURISM TES 1.1 Road DOKAP DOKAP RDA Local 2014-2019 The road route, starting from improvement Provinces Authorities Samsun Airport and ending at the works will Sarp border gate to tourism within the scope of the Eastern Black Sea continue within the Tourism Master Plan will be scope of the improved in order to protect the Green Road. natural texture of the region by ensuring passenger and vehicle safety. Compliance with the physical plans and regional plans regarding the road route and related tourism development decisions will be observed. TES 1.2 Investments DOKAP DOKAP RDA Local 2015-2018 Tourism investment support on the Green Provinces Authorities program will be implemented. Road route will be supported.

Table 4.1. Tourism and environmental sustainability actions

The second important policy document after the 2014-2018 Action Plan is the DOKAP Regional Development Program covering the 2021-2023 period. The effective and efficient use of resources, the appropriate evaluation of local dynamics and opportunities, the spread of regional development across the country, and the reduction of interregional development disparities have stated as the main objectives of regional development and planning in Turkey (DOKAP Bölge Kalkınma Planı 2021-2023, p.11). In the preparation of the DOKAP Regional Development Program, which covers the 2021-2023 period, the implications and objectives of the first Action Plan (2014-2018) have been guiding. Considering the allocation and expenditures of the DOKAP Action Plan (2014-2018), it is

seen that it confirms the first action plan as you can see in the figure 3.4. (DOKAP Action Plan 2021-2013, p.23).

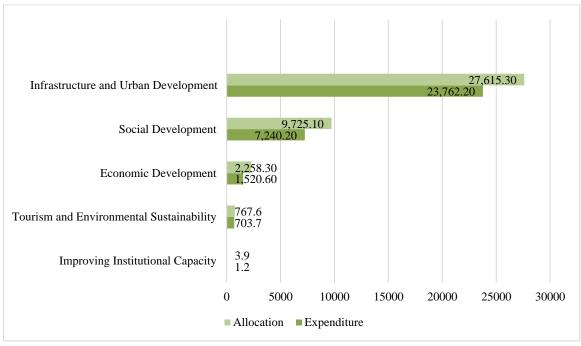


Figure 4.3. Allocation and Expenditure by Categories (in 2020 prices, million TL)

When public investments made within the scope of the DOKAP Action Plan are analyzed on a sectoral basis, it is observed that the highest investment amount is in the transportation sector. In addition, important public investments were made in the field of tourism, which is the significant sector of the DOKAP Action Plan. According to the DOKAP Regional Development Program, the public investment amount of the Green Road Project constitutes a remarkable part of the public tourism investment amount throughout the country (DOKAP Regional Development Program 2021-2023, p.23). DOKAP Regional Development Program (2021-2023) includes three objectives, eight targets and fourteen sectoral operational programs (SOPs). Through the determined objectives, targets and sectoral operational programs (SOP), it aims to:

- reducing the regional inequalities between the DOKAP and other regions;
- growth in agricultural production, increase in added value and rural development,
- economic growth in tourism and industry,
- and improving human capital and institutional capacity (DOKAP Regional Development Program 2021-2023, p.15).

It is stated that the Regional Development Administration is responsible for the implementation of DOKAP Regional Development Programs, and the Ministry of Industry and Technology or the Presidency for the ratification and monitoring processes (DOKAP Regional Development Program 2021-2023, p.128).

It would not be wrong to say that the Green Road is a project which connects transportation infrastructure improvement and tourism development targets and investments. In this sense, in the DOKAP Regional Development Program (2021-2023), some sectoral operational programs (SOP's) involving this dual combination are included.

Table 4.2. Sectoral Operational Programs (DOKAP 21-23; 123)

Sectoral Operational Indicator		Measurement	Initial	Year of	Objective	Data Source
Program		unit	Value	Start		
Tourism Development	Length of the Road with	km	502	2022	552	DOKAP RDA,
Program	rogram Improved Superstructure					Local
						Authorities
Tourism Development	Length of the Road with	km	688	2022	738	DOKAP RDA,
Program	Improved Infrastructure					Local
						Authorities

According to these sectoral operational programs, superstructure and infrastructures are defined as indicators of tourism development. And infrastructure and superstructure investments share in the region is approximately 40% of the public investments to be made in the region between 2021-2013. The Green Road Project, which is the sum of the transportation and tourism investments in the region, has great importance for the government stakeholders.

Table 4.3. Sectoral Operational Programs (DOKAP 21-23; 126)

Project No	Project Name	Sector	SOP to Be	2021	2022	2023	Total
			Financed				
T0121A01-	Small Scale Agricultural	Agriculture / Irrigation	S1	S1 : 15.000	S1 : 15.393	S1: 16.859	47.798
162303	Irrigation Project						
2015A02-	Development of	Agriccultre/Vegetative	S2-S6-S7	S2 : 23.000	S2: 25.000	S2 : 25.500	99.175
2223	Vegetative Production	Production		S6: 4.939	S6: 5.000	S6: 5.500	
	Infrastructure			S7: 2.500	S7: 3.325	S7: 4.411	
T021A03-	Development of	Agriculture/Livestock	S3-S4-S5	S3 : 19.155	S3: 19.724	S3: 19.651	74.142
164210	Livestock Infrastructure			S4 : 3.355	S4: 4.000	S4: 5.000	
				S5 : 757	S5: 1.000	S5: 1.500	
2020A02-	Development of Small	Agriccultre/Vegetative	S4	S4: 1.044	S4: 0	S4: 0	1.044
150385	Agricultural Enterprises	Production					
T021F00-	Development of Toursim	Tourism/Tourism	S8-S9	S8 : 14.287	S8: 64.967	S8: 70.646	155.880
164139/148	Infrastructure Projects			S9: 1.680	S9: 2.000	S9: 2.300	
2020C33-	Development of Industrial	Manufacturing/SME and	S10	S10: 846	S10 : 795	S10: 973	2.614
149702	Ecosystems	Entrepreneurship					
New Offer	Improvement Capacity of	Social / Employment and	S11	S11: 0	S11: 5.500	S11: 5.500	11.000
	Local Institutions	Working Life					
	Program						
T021H04-	Supporting Education,	Education / Culture	S12-S13-	S12: 440	S12: 4.400	S12: 4.400	27.400
162218	Culture and Art Activities		S14	S13: 153	S13: 3.300	S13: 3.300	
				S14: 407	S14: 5.500	S14: 5.500	

Total 87563 160450 171040 419053

To sum up, the Eastern Black Sea Region is considered among the underdeveloped regions. Various efforts have been made since the 1980's to develop the region. As a result of these studies, insufficient transportation structure and tourism potential of the region were determined as two important key points. For this reason, infrastructure improvement and tourism development have been the focus of policy documents. The number of public investments shared in the reports confirms this tendency. Action plans and strategies have been created in this direction and DOKAP Regional Development Agency has held the main coordinator role. The Green Road Project is the result of all these attempts.

From a limited perspective, the shortness of season and the inadequacy of transportation facilities can be stated as the most important problems in tourism activities in the Eastern Black Sea region (DOKAP 2016; DOKAP 2014: 55). The project named "Green Road" was developed as a solution to this problem and it is defined " "A tourism project integrated with nature, which connects the important plateaus and tourism centers of eight provinces and allows domestic and foreign tourists coming to the region to travel along the determined route in an improved physical structure" (DOKAP 2016). And its main purposes are stated as meeting the demands of the tourists who demand nature tourism with the Eastern Black Sea plateaus, increasing the tourism potential by connecting tourism areas and increasing the income level of the local people engaged in transhumance (DOKAP 2016). However, not enough information has been given to evaluate the project efficiently. Merely a map (Figure 1) and "Green Road Information Note" that defines Green Road as a road which connects plateaus in Eastern Black Sea Region has been given (DOKAP, 2015).

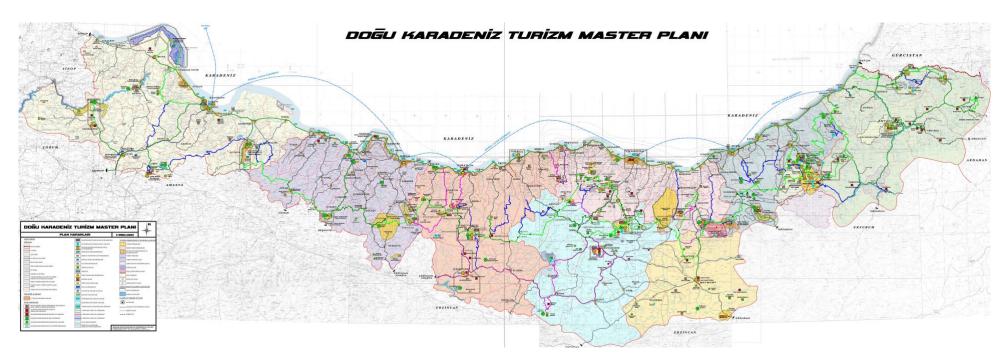


Figure 4.4. The Eastern Black Sea Provinces Map (DOKAP, 2015)

The activities that cause the most damage to forests in mountainous and sloping lands, leave permanent marks such as stab wounds, and take a long time to recycle are road construction and maintenance works, since forest road construction is risky activity that is technically difficult, economically expensive, and environmentally damaging to all elements of the ecosystem (Kurdoğlu & Ünver-Okan, 2015). For this reason, all of the construction purposes, requirements, technical, economic, social and environmental dimensions of forest roads should be considered as a whole and planned very carefully and built with appropriate techniques (Acar, 2005). It has been emphasized in many studies that road networks have various ecological effects such as hydrology, habitat loss, land fragmentation, pollution, noise and barrier effects on ecosystems, and death or behavioral disorder in wild animals (Spellerberg, 1998; Gunther and Biel 1999; Forman and Deblinger, 2000; Dodd et al., 2004; Hawbaker and Radeloff, 2004; Görcelioğlu, 2004). In their study, Develey and Stouffer (2001) revealed that there is a negative relationship between road density and animal or plant species density.

Investigating how the project first came into the national agenda is important to understand the overall aim of the project. Many sources point to the Tourism Master Plan of Turkey. In March 2007, Turkey Tourism Strategy (2023) and Turkey Tourism Strategy Action Plan (2007-2013) entered into force after being published in Official Gazette No. 26450. For the first time, the project was mentioned in an official publication under the name of "Plateau Corridor". After that, Ordu - Trabzon - Rize - Giresun - Gümüşhane - Artvin Planning Region 1/100,000 Scale Environmental Plan was approved on 24.06.2011 according to Article 7 of the Decree-Law No. 644 on the Organization and Duties of the Ministry of Environment and Urbanization ("Ordu - Trabzon - Rize - Giresun - Gümüşhane - Artvin Planlama Bölgesi - Mekânsal Planlama Genel Müdürlüğü", 2022). This is evaluated as a concrete step. In the same year, the project was announced by Culture and Tourism Minister of the period, Ertuğrul Günay, at the Eastern Black Sea Tourism Master Plan meeting, and he said, "There is a world-famous Blue Cruise in the southern part of Turkey. We also dreamed of a Green Journey to the Black Sea. We are planning a Green Journey in the Eastern Black Sea region from Samsun to Artvin, including Gümüşhane and Bayburt." (Haberler, 2011)

4.1.2. Green Road Project and Reactions

The first oppositional attempt against the project was the legal action from the TEMA Foundation (The Turkish Foundation for Combating Erosion Reforestation and the Protection of Natural Habitats). TEMA filed a lawsuit against the parts of the area that may pose a threat to the natural assets in the Environmental Plan. On 4-5 November 2013, a discovery and expert examination was carried out in the region regarding the case. On January 26, 2014, the 6th Chamber of the Council

of State, which handled the case, decided to stay the execution of some of the demands of the TEMA Foundation (Emlakkulisi, 2016).

In 2015, the local people have received the information about the road work to be done as a part of the "Green Road" project between Samistal Plateau and Kavrun Plateau, located at the foothills of Kaçkar Mountains in Çamlıhemşin district of Rize and they stopped equipment. The Green Road project encountered resistance at four different areas. The 6.5-kilometer Yukarı Kavrun-Samistal road construction attempt was stopped by locals first in Yukarı Kavrun and then in Samistal after a fifty-day resistance. While the court decided to stay the execution on the Haznedar-Avusor road construction, the local residents in the village of Mahalleca prevented the road building in their district (Danış, 2016). At the meetings held in Fırtına Valley after this action, it was decided to continue the struggle under the name of the "Fırtına Initiative" (Aksu & Korkut, 2017). A lawsuit was filed in the Rize Administrative Court to stop the road project between Fırtına Valley Samistral Plateau and Kavrun Plateau in the Green Road Project by the Fırtına Initiative. Lawyer Yakup Okumuşoğlu stated that the region is within the borders of the protected area (SİT and the National Parks) (Birgün, 2022). July of 2015 is one of the important periods for the project where tha nation witnessed many protest actions (Bianet, 2015; Diken, 2015; Evrensel, 2015) led by the local people. The project and its potential impacts came into agenda of the general public.

Protests were organized not only by the people of the region but also in different cities (Evrensel, 2015; Bianet, 2015). Especially in the region, public (anti-project) and governmental (pro-project) stakeholders came face to face because of the project, and the disagreement between them brought physical intervention, against the local people (Diken, 2015) Süleyman Soylu, Vice Chairman of the AK Party at the time, when talked about the reactions against the Green Road Project, criminalized the protesters and claimed that they are terrorists (Birgün, 2015). After this unfortunate statement, the construction works previously stopped in Çamlıhemşin's Samistal plateau after the reaction of the residents, resumed under the supervision of the gendarmerie despite the court decisions. However, interestingly, the Ministry of Environment and Urbanization also announced that there was no decision to approve or take action on the Green Road Project (HalkTV, 2015). Meanwhile, the protests against the project have continued, the locals have made statements to the press (Haberler, 2015) and the reactions spread to other parts of the country as well. A group of artists released an anti-road video with collaborating Firtuna Initiative (T24, 2015).

In December 2015, the Council of State decided for a "stay of execution" for the lawsuit filed by the Tema Foundation for the "Environmental Plan" covering provinces in the Black Sea Region.

TEMA conveyed the decision made by the 6th Chamber of the Council of State in 2014 to the Board of Administrative Lawsuits of the Council of State. The decision of the court, which evaluated the objection regarding the Yeşil Yol and HPPs (Hydroelectric Power Plant) decisions, was published in UYAP on January 14, 2016. With the decision, the provisions of HPPs and Green Road in the environmental plan were also reversed and the case was sent back to the 6th Chamber of the Council of State for the final decision. The discontinued 1/100,000 scale Environmental Plan was rearranged by the Ministry of Environment and Urbanization. TEMA announced that the Environmental Plan, which was re-approved, was also illegal (Cumhuriyet, 2016). Besides all these, some protesters were prosecuted and on 6 June 2017, the first hearing of this case was held (Evrensel, 2017).

On September 4, 2019, the main opposition party, the Republican People's Party (CHP), published a report (Chp, 2019) covering the investigation of the plateaus where the 'Green Road' project was planned to be built. The report pointed out that irreversible damages were caused in an ecologically protected area. In December 2018, the Rize Administrative Court decided in the lawsuit filed for the cancellation of the Green Road Project and it has been reported that the works within the scope of the Green Road Project will continue (Bianet, 2018). However, the conflicts continued. The plenary session of administrative law divisions unanimously stopped the execution of the Ordu-Trabzon-Rize-Giresun-Gümüşhane-Artvin planning region, which was revised and approved by the Ministry of Environment and Urbanization in 2016. Despite all the stopping decisions, it was a very interesting development. Despite the stay of execution, DOKA went out to tender within the scope of the "Financial Support Program for Supporting Culture and Tourism Investments on the Green Road, Stage 2" (Cumhuriyet, 2020). The Council of State Administrative Litigation Chambers made another important decision and adopted the stay of execution of the zoning plans in 2020. In the decision, it was emphasized that the roads connecting the Eastern Black Sea plateaus will destroy the existence of the habitats (Bianet, 2020). Despite the Council of State's annulment decision, the Eastern Black Sea Development Agency (DOKA)'s opening of a financial support program drew the reaction of non-governmental organizations. 55 NGOs made a press release and demanded DOKA withdraw the tenders and support they had opened within the scope of the project (Indyturk, 2020). In addition, the municipalities of the opposition party were among the other stakeholders who reacted to DOKA's program (Cumhuriyet, 2020). Despite objections and court decisions, the Green Road project caused great damage to nature. Rize Special Provincial Administration admitted that the Green Road Project damaged the endemic vegetation and decided to carry out germination work in the region (Akduman, 2020). Finally, it has been revealed that the work on the Rize leg of the Green Road Project, which was started by DOKAP in 2013 and was canceled by 2 separate courts, will continue. Rize Special

Provincial Administration included project construction in its 2020-2024 strategic plan, ignoring court decisions (Akduman, 2021).

4.2. Understanding the Debate: Methodological Design

The study was designed to examine certain attitudes of stakeholders about the Green Road Project in the context of environmental justice. In the research, the project was discussed using a three-dimensional environmental justice framework which includes distributional justice, procedural justice and justice as recognition. This theoretical framework provided the opportunity to examine Green Road Project's argument groups between stakeholders from the environmental justice perspective.

First of all, I conducted a preliminary research and made two pilot interviews with two stakeholders, chosen by convenience, guiding me on how to better frame the debate, how to approach the matter with a systematic method and how to better categorise the stakeholders. In the UNWTO Sustainable Tourism for Development Guidebook, sustainable tourism stakeholders are categorized as; residents, tourism professionals, tourists, governmental organizations, non-governmental organizations, media and experts (UNWTO, 2013) (Table 4.4.). I made some changes to stakeholder lists, inspired by UNWTO (2013), so that the analysis results would be reliable and valid. Since tourists' arguments are not included in secondary sources, I have not included tourists in the first argument analysis tables.

Secondly, national government stakeholder group includes the ministries, governors, development agencies. In addition to this, considering the political conjuncture in the country, I thought it appropriate to include the governing political party parliament members, its institutions and its municipalities outside the Black Sea Region in this category.

Since NGO's is a very comprehensive stakeholder category, I divided it into three subcategories which are are professional chambers, civil society and opposition political parties (OPP). All opposition parties (CHP, HDP), its institutions and their municipalities outside the Black Sea Region are determined as OPP stakeholder. All municipalities, neighbourhood representatives and local authorities in the region were determined as local government stakeholders. When we look at other stakeholder groups, tourism business covers the hotel and restaurant owners, tour operators, guides and all kind of tourism employees while the media includes the national mass media, local media and

independent journalists. Finally, expert's stakeholder group contains academics, engineers and planners with expertise and opinions on the project.

Table 4.4. List of stakeholders

List of Stakeholders	Description					
National Government	Ministries, Governors, Development Agency, Governing political party AKP), Coalition Partner (MHP)					
Local Government	Metropolitan Municipalities, District Municipalities, Headmans					
Tourism Business	Hotel&Restaurant Owners, Tour Companies, Guides					
Experts	Academics, Engineers, Planners					
Tourists						
Local Residents	Villagers, Farmers etc etc					
Non-governmental Organizations						
Professional Chambers	Local and National Professional Chambers, Trade Associations					
Civil Society	Local NGOs (Local Associations, Local CSOs), National NGOs (Environmental NGO,)					
Opposition Political Parties	CHP, HDP					
Media	National Mass Media, Independent Journalists and Local Media					

Then, with a qualitative and textual exploratory analysis, I collected 142 arguments from 120 sources, covering news, reports, books, websites, newsletters, videos, social media platforms, meeting notes, and press releases in the public sphere (see Appendix A). In these arguments, there are opinions of local and national scale pro-and anti-project stakeholders from seven groups. After this process, for the confirmation and having better understanding, seven in-depth interviews were conducted with different stakeholders.

In order to analyze the arguments, I used the three EJ dimensions as a basis which are distribution (economic and ecological), participation and recognition. Inherently, opinions expressed by stakeholders illustrate that there is a complex issue in the context of the Green Road Project. Even though the stakeholders seem to stand in a complex conflict for many different reasons, mapping the arguments provided a clearer pattern helping to better understand the main sources of conflict.

4.3. Mapping of Stakeholders' Arguments

After the stakeholders have been identified and their arguments collected, I matched each argument to related environmental justice (EJ) dimension. Then I conducted a discourse analysis to detect issues that are frequently repeated in arguments by stakeholders and I categorized them as "argument groups" under the each EJ dimension, as seen in Table 4.5. These argument groups, helping to clarify the prominent issues and the background of environmental justice conflict. are as follows: For ecological distribution these are ecological impacts on ecosystem and biodiversity, risk and safety concerns, land use impacts and accessibility; for economic distribution, these are impacts on local economy, impacts on national economy, employment; for participation, these are local participation in decision making, and power inequality in decision making; and for the recognition, these are appropriateness of the existing legal framework, implementation of the existing legal framework and respect for rights. (See Appendix B for the complete categorisation of all arguments into respective groups).

Following this, I mapped each argument for all stakeholder groups according to whether they contain a negative or positive judgement about the project. For instance, an argument put forward by the national government states that they "aim to grow the [economy of the] region [with the project]" (see argument 12 in Appendix A). This argument contains a positive judgement about the project in the "impacts on local economy" group. After having coded each argument as such, I then collated them for each stakeholder group. If all the arguments by a stakeholder group in a specific argument group contain positive judgements, then I color coded this particular cell as green. And if all arguments were negative, I used the color red. For cases where there were both positive and negative judgements, I used the color yellow. (Needless to say, if there were no arguments by a stakeholder group about a particular dimension, then the cell remained empty). The resulting table is presented in Table 4.5, summarizing the dimensions and argument groups in which stakeholders oppose and defend the project and makes it possible to see the views of each stakeholder group in one shot.

Table 4.5. Argument groups categorized by environmental justice dimensions

EJ Dime	ensions	Argument Group	Description
	n	Impacts on biodiversity and ecosystems	Most of the stakeholders put forward the ecological impacts as an argument, such as ecological impacts on biodiversity and ecosystem. Anti-projects are stressed about the destructive impacts of the project, meanwhile proponents expressed that the project will promote ecological protection.
	Ecological Distribution	Risk and Hazards	Considering previous experiences of hydroelectric power plants (HPP) in the region, many stakeholders are concerned about the increasing vulnerability of the ecosystem where the project is located.
	cologica	Accessibility	The other prominent argument says thanks to the project, many people will be able to access the natural assets of the region and benefit from them.
Distribution	Ä	Land Use Impacts	All stakeholders put forward this issue from different perspectives. While proponents argue that the project will increase the accessibility of the region to the services such as transportation, infrastructure, opponents are concerned that the project will cause excessive construction in the region.
Dist	ion	Impacts on Local Economy	Economic growth and development is the most important and frequent discourse of the proponents and they justify the project because of its economic contribution to the region. According to them, the project will improve the economy through increasing tourist numbers and employment.
	Economic Distribution	Impacts on National Economy	When the region becomes an international tourism attraction, tourism not only contributes to the region but also to the overall economy of the country.
	Economi	Employment	Related to the other two argument groups (tourism development and impact on local economy) pro-projects argue that upon increasing tourism volume and its economic impact, employment will increase. However, some of the anti-projects put forward this argument, since they expressed that increasing tourism practices will deprive them of their own jobs and force them to employ in the tourism sector.
	pation	Local participation in decision making	Especially opponents, evaluate this project as top-down decision and they expressed that there was no participant procedure in planning of the project.
	Power inequality in decision making process		Many anti-project stakeholders, mostly local residents, argue that they are excluded from the decision making. Additionally, experts which are against the project expressed that their studies and opinions are ignored.
		Appropriateness of the existing legal framework	Most opponents argue that the project is not appropriate for existing legal framework, and they claim that policy makers ignore these frameworks and procedures or regulate the project plans to stay out of them.
	Recognition	Implementation of the existing legal framework	Most of the anti-project stakeholders are concerned about ignoring the legal frameworks and regulating the project plans to stay out of these frameworks and sanctions.
		Respect for rights	Most anti-project stakeholders are concerned about ignoring legal frameworks and ignoring participant and planned decision making, the project will impact on the rights of the mostly local residents, biodiversity and ecosystem.

Table 4.6. Classification of stakeholder arguments according to EJ dimensions

Inconclusive

Good

Color significations: Bad

MEDIA EJ Argument NG LG LR NGOs EXP BUSN **Dimensions** Group CS OPP PC Impacts on biodiversity and ecosystems Risk and Hazards Accessibility

Ecological Distribution Distribution Land Use Impacts Impacts on Local **Economic Distribution** Economy Impacts on National Economy **Employment** Local Participation participation in decision making Power inequality in decision making process Appropriateness of the existing legal framework Recognition Implementation of the existing legal framework Respect for rights

From a broader perspective, the tables or maps created with the help of the obtained data can help to clarify the overall situation in the region. In addition, these tables show us which stakeholder groups are against the project and which arguments they express more frequently or which stakeholder groups are the proponents of the project and what are their prominent arguments.

In general, it can be said that stakeholders are divided into two main groups as opponents and proponents regarding the Green Road Project. To put it briefly, the supporters of the project (proprojects) are mostly local and national government, while the opponents to the project (anti-projects) are local people, tourism operators, experts and non-governmental organizations.

While the opinions about the project itself are abundantly discussed by the stakeholders, the issue is discussed mostly in the absence of proposal of alternatives to the project. When the arguments are analysed, there are only six instances where an alternative is proposed instead of the project and they focus on conservative policies addressing the needs of the locals rather than excessive growth-based implications. In addition to this, these alternatives mostly come from stakeholders which are ignored by policy-makers. Some examples are as follows:

While building the infrastructure of tourism in the Black Sea region, it is necessary to pay attention to issues such as protecting the historical texture, encouraging and supporting traditional architecture, not allowing construction in natural habitats. - Uğur Biryol (Tourism Business & Local Resident)

We want the existing roads to be restored and to become more useful, but not to be expanded or no new roads to be built. A conservation plan should be prepared as soon as possible. We want projects to be developed that will serve the citizens. — Yakup Okumuşoğlu (Lawyer)

The local economy can be strengthened by using the products and services in the region while eco-tourism and nature-sensitive activities are carried out. In this way, sustainable livelihoods can be provided by protecting our natural assets and local cultures. - Deniz Ataç (Chairwoman of TEMA Foundation)

In the next section, I have shared all the EJ dimensions and analyses through the Table 4.3 in detail. In addition to this, I explained the in-depth interviews by relating them to the dimensions.

5. RESULTS

5.1. Discourse Analysis of Stakeholders from Environmental Justice Perspectives

According to information that is gathered from stakeholders, it is not wrong to say that there are two groups: pro-projects and anti-projects. Most of the arguments collected include opponents of the project, while only small part of arguments is from the proponents of the project. The reasons for this difference may also be a matter of debate. If it is looked at which stakeholder groups the pro-projects and anti-projects are concentrated in, it can be said that pro-projects are mostly local and national government, while the anti-projects are local people, tourism operators, experts and NGO's. In addition, national governmental institutions and non-governmental organizations constitute the majority of stakeholder groups. All arguments in collected data contain either positive or negative judgement, except one (Argument number: 62), indicating an immense polarization between stakeholders. I will briefly discuss each dimension and provide more information about the nature of arguments.

5.1.1. Distribution

Ecological Distribution

E.I NG LG LR NGOs EXP BUSS MEDIA **Argument Group Dimensions** PC CS OPP Impacts on biodiversity and ecosystems **Ecological Distribution** Risk and Hazards Distribution Accessibility Land Use Impacts

Table 5.1. Classification of stakeholder arguments according to Ecological Distribution

In the ecological distribution dimension, four argument groups were identified. These are ecological impacts, risk and safety, accessibility and land use. Most anti-project arguments go about the ecological distribution dimension. Certain groups of stakeholders, -local governments (mainly municipalities in this case), local residents, NGOs, experts, and media- state in their arguments that the project will have devastating effects on the environment. "Ecological impacts" is the most frequently cited argument group among the opposing arguments. Subsequent and repeated argument groups are "risk and safety" among the anti-projects' arguments. The Black Sea Region is a risky region that has been damaged by "HPP projects" in recent times. Some stakeholders claim that the degradation of nature will increase the fragility of the region and the project will affect the region badly in that sense. Therefore, risk and safety issue is one of the main basis of opposing arguments. On the other hand, a few proponents state that the project will make a positive contribution to the region in ecological distribution context by increasing the accessibility and that's why they support it. They consider increasing the accessibility as a good aspect since now, more people (who were previously unable the reach the project site) will be able to enjoy the recreational ecosystem service provided by the natural beauties of the region. This is well exemplified in the below argument by A. Davutoğlu, the prime minister of the period.

We are doing this project so that people from all over the world will visit and fall in love with the plateaus of the Black Sea and get healed in its air. - Ahmet Davutoğlu (Prime Minister of the period)

Economic Distribution

Table 5.2. Classification of stakeholder arguments according to Economic Distribution

EJ Dimensions		Argument Group	NG	LG	LR	NGOs			EXP	BUSS	MEDIA
						PC	CS	ОРР			
Disribution	Economic Distribution	Impacts on Local Economy									
		Impacts on National Economy									
		Employment									

In general, the arguments of proponent stakeholders concentrate on the economic distribution dimension of environmental justice. As a result of the analyses, three argument groups were identified under the economic distribution dimension. These are impacts on the local economy, impacts on the national economy, and employment. Almost all of the discourses point to the tourism development in the region in their arguments. Related to this, the economic contribution of the project that comes with tourism development is prominent argument of the proponents. Apart from the few arguments highlighting employment, the economic growth here is expressed usually through the increasing number of tourists and the volume of tourism practices. Considering that this project is a road construction project, another issue is put forward with the development of tourism. Urban development is one of the other recurring argument groups under the economic distribution dimension. Particularly, pro-project national government stakeholders stated that new tourism projects and investments in the context of the Green Road Project will result in urban structuring in the region. Thus, the tourism capacity of the region will increase and its economy will recover. On the other hand, the arguments of some pro-projects and anti-projects overlap. While one stakeholder approaches the same issue from a positive perspective, the other approaches it from a negative perspective. In the context of economic distribution, some stakeholders, especially local residents and non-governmental organizations, assess the tourism development adversely since it has destructive impacts on the region in the economic sense. Specifically, they are concerned about the fair distribution of economic benefits. Additionally, what is not said is as important as what is said. For example, except the national government, none of stakeholders express an argument regarding economic impacts on national economy and employment.

5.1.2. Participation

Table 5.3. Classification of stakeholder arguments according to Participation

EJ Dimensions	Argument Group	NG LG		LR	NGOs			EXP	BUSS	MEDIA
					PC	cs	ОРР			
pation	Local participation in decision making									
Participation	Power inequality in decision making process									

Considering the arguments and the planning process, there was no evidence of a participation attempt involving all stakeholders. Since both proponents and opponents made little reference to it in their discourses, it cannot be said that it is a very prominent dimension. However, some arguments are like a confession of top-down decision-making. They illustrate that some stakeholders are ignored in this process, while particular stakeholders are involved.

In this direction, our president prepared a Tourism Master plan from Samsun to Artvin, the Green Road was one of the works to be done within the scope of this Master Plan, our president and government set a goal regarding this issue, namely the goal of building a road through the plateau corridor. -Hakan Gültekin (Chairman of DOKAP)

Two argument groups were determined under the participation dimension, which are local participation in decision making and power inequality in decision making. When examining the arguments, power inequality in decision-making has come to the fore compared to the other issues. Looking at the Table 5.3., national government stakeholders confirm that there is inequality in the decision-making process in their arguments. Moreover, tourism professionals in particular view the lack of a participatory process adversely in the context of the project and informing process about the project plan and implementation is seen as problematic by many stakeholders. On the other hand, participation is a dimension about which stakeholders do not produce much discourse. This may be a particular discussion and further research topic that needs to be clarified.

5.1.3. Recognition

LG LR NGOs EXP BUSS MEDIA EJ Dimensions **Argument Group** NG PC CS OPP Appropriateness of the existing legal framework Recognition Implementation of the existing legal framework Respect for rights

Table 5.4. Classification of stakeholder arguments according to Recognition

Recognition dimension is included in the arguments of almost all opponents whereas proponents do not put forward any positive or negative opinions. Considering the arguments, three different argument groups can be identified under this dimension: appropriateness of the legal framework, implementation of the legal framework, and respect for rights. NGOs and experts are prominent stakeholders in this dimension, as they have discourse in all three determined argument groups. In other words, recognition is a significant dimension for these stakeholders. Another important point is that local residents have only negative discourses under the "respect for the rights" argument group. One prominent argument about how right of the locals are not recognised is as follows:

The roads of the plateaus will not be constructed. We certainly don't want to. The governor calls us looters. We have lived here since childhood. Governor, who is the Governor? I am the local and I am here. - Rabia Özcan (Local Resident)

NGOs, experts and local residents, underlined that the legal framework of the project is problematic alongside "respect for rights" issue. They have stated that both the required legal procedures are not monitored during the project steps and the legal decisions taken are ignored.

There are cheats against the law in this project, we express them and say it cannot be implemented. -Yakup Okumuşoğlu (Lawyer)

5.2. Interviews

To have a better understanding, I integrated alternatives issue to the interviews as question. After all, this data was collected from secondary sources and analyzed, hence a supporting interview stage was helpful for the verification and clarification. In the light of the results of the analysis, a semi-structured interview questionnaire was prepared and seven interviews with various stakeholders were conducted. This group includes three local residents, three experts and one civil society representative. While five of the seven interviewees in the stakeholder group describe themselves as opponents, the remaining two have a more objective stance. I could not have an interview with the proponents of the project despite several attempts to contact them. In general, it is possible to say that the interview outputs have the same direction with the argument analysis.

From "ecological distribution" perspective, most of the interviewees have arrived at a consensus for destructive impacts of the Green Road Project on the region. The increasing number of visitors and tourism facilities capacity due to tourism development, and transportation construction have been

stated as the notable causes of this impact. It is stated that the destinations where the project is planned are categorized as natural sites and protected areas. Especially unplanned tourism development is not sustainable in terms of natural assets of the region.

They leave their garbage in the environment and all the forests are already polluted there. The entire endemic structure has been destructed. They permit thousands of vehicles into the valley in an uncontrolled manner. Interviewee 1 (Tourism Business – local resident)

The places where you want tourists to visit are the untouched places of the eastern Black Sea, its valleys, mountains, plateaus, pastures, important protected areas, in other words, all of Çamlıhemşin Kaçkar Mountains plateaus are categorized under protected areas. - . Interviewee 4 (Lawyer - Expert)

The construction of a new touristic facility, the creation of a serious ecological footprint, that is, has many effects on nature. -. Interviewee 2 (NGO Representative)

Another outstanding finding in the interviews is that the project is conducted in a top-down decision structure. The most frequently pointed arguments are the lack of information, the inadequate inclusion of stakeholders in the decision-making process, and non-transparency, since the project first came to the agenda. Considering both participation and recognition dimensions, they stated that there were problems in the planning and implementation stages of the project and that open communication could not be established with institutions and authorities coordinating it.

In other words, the project really suddenly appeared. When we found out, the road was mostly completed and that's how we learned the project. -. Interviewee 2 (NGO Representative)

It is seen that interviewees are putting forward negative arguments about the planning, coordination and implementation process of the project. In particular cases, they reported conflicts that lead to direct and severe interactions between them and the proponents. Some of the interviewees claimed that the state intervened harshly to those who were protesting the project.

At the same time, we are struggling with the courts. Despite the decision of the Council of State, we were detained because we oppose it. There were 11 women and me, they detained us all. -. Interviewee 1 (Tourism Business – local resident)

Moreover, they state that the current tourism development objectives and plans are not suitable for the traditional way of life in the region and threatens the existing socio-cultural and economic structure. Related to this, since voices of the stakeholders, pointing to this situation are ignored mostly, the project is treated as an "unpeople project". On the other hand, almost all interviewees remark on disputes associated with the legal framework and it is stated that all court cases against the project were won.

We have won all the cases we have opened regarding the Green Road Project. [But] It does not mean that we are very successful [since the project is going on]. In other words, there is no legal infrastructure. - Interviewee 4 (Lawyer - Expert)

As I mentioned before, when arguments are analyzed, economic contribution is the prominent discourse of the stakeholders who support the project. And also, I detected that these proponents involved mostly national government stakeholders and the other groups have no remarkable discourses about the economic impacts of the project. However, in the interviews, the interviewees have also discussed the economic dimension of the project. Contrary to national government actors, interviewees pointed to the unfair distribution of the economic contribution of the project and they claim that public investment does not cover all part of stakeholders equally. In other words, they evaluate the project as a tool of unfair distribution of economic resources.

The European Union provides funding to Turkey and DOKA allocates it to the construction companies. For what? For the construction of roads. It has nothing else to give [to the local people]. - Interviewee 4 (Lawyer - Expert)

In addition to this, an interviewee addressed the employment that tourism development will create in the region and claims that the locals find jobs at the lowest level in this employment strucutre. This situation does not seem fair in terms of economic benefit.

Local people work in tourism at the lower positions. Therefore, it would not be correct to say that the locals are at the center of economic benefits. - Interviewee 7 (Lawyer)

To sum up, these collected arguments and interviews show that there is a complex environmental justice issue as a result of the Green Road Project. After the arguments were analyzed, a total of twelve argument groups were identified under three dimensions. Taking into account the interview outputs, it seems that the issue is even more complicated. In addition, the interest areas where each stakeholder has conflicts and the order of importance they give differ. However, when all this data is evaluated by considering the theoretical framework, it identifies a certain pattern. Out of 142 arguments, 141 of them positioned themselves on a side. While the arguments of the proponents focused on the dimension of economic distribution, the arguments of the opponents focused on the dimension of ecological distribution and recognition. It can be said that there was no notable point where the interview results conflicted with the data collected at the first phase of the study. On the other hand, thanks to the opportunity provided by face to face meeting, it enabled the issue to be examined in more detail. Thus, it raises important points that were not included in the 142 arguments but are worth considering as I will examine in the discussion part.

6. DISCUSSION

The data collected in this study were examined using the environmental justice framework and discourse analysis method described previously in chapters 2 and 4, respectively. I shared the findings in the previous parts of the thesis in detail. However, besides these findings, I would like to discuss some further important points that were not well-placed in the theoretical framework that I think need to be addressed. I hope this chapter will give a broader perspective on the subject by questioning and discussing different issues.

The first notable issue raised in particular arguments and in six of the interviews is mining. In their discourse, the stakeholders doubt that the roads constructed within the scope of the Green Road Project are for mining companies. In addition to this, it is stated that access to information about mining permits, which have been generously granted recently, is restricted. The Green Road Project, which we consider as a tourism project, acquires a completely different dimension when mining comes to the agenda. Therefore, it is essential for good governance that all stakeholders clarify this issue.

The Eastern Black Sea region has a long history for environmental resistances and protests. Black Sea Coastal Dual Carriageway Project, which was tendered in 1987 and officially opened in 2007, caused many objections and debates in the region. Even the prime minister of the period stated that this project was not feasible, but that it had to be completed due to its high cost spent in the past (Birgün, 2010). Objections with ecological concerns to the project proved to be justified over time (Sendika, 2012; Cumhuriyet, 2019; Yeniçağ, 2022). Another prominent and long-running environmental movement in the Eastern Black Sea Region, the protest in the Cerattepe district of Artvin, originated from the resistance against the excavation of natural resources for mining activities. In 1986, field exploration activities were initiated by the General Directorate of Mineral Research and Exploration (MTA), and a few years later, a license to continue the exploration was given to a mining company. Drilling practices of the company in the region have caused destructive environmental impacts. Result of this, an environmental movement has organized under an association (Yeşil Artvin Derneği) following objections raised against the company's operations in the field, and the site had a series of protest events after that date. And las but not least, there is a strong vein of opposition against HEPPs in the region. According to Energy Atlas data, there are 708 HEPPs operating in Turkey, while there are 231 HEPPs only in the Central and Eastern Black Sea Region (Enerji Atlas, 2021). The HPPs, which are said to be built to meet the energy needs, are

criticized for destroying nature and endangering the biodiversity and ecosystems (Üçüncü and Demirel, 2020). There have been protests against HPP in many different parts of the region, and it has evolved into an environmental movement against HPP. The Eastern Black Sea Region is familiar with projects that create environmental justice conflicts and has a long history of struggling against them. In this sense, this past and current experiences may be enlightening when considering the Green Road Project.

Considering all the planning documents I examined, it is clear that the type of tourism planned in the region is eco-tourism. Eco-tourism is a type of tourism with a higher dependence on natural resources compared to other types, since the natural assets are the main attractions of ecotourism. In this case, construction plans on such a scale, approximately 2600 km, will damage the natural assets of the region and destructive impacts on ecosystems and habitats are very likely. In addition, the increased tourism capacity will consume the natural resources of the region over time. At this point, if the consumption occurs faster than the self-renewal capacity of nature, the life cycle of a tourism destination, not just for nature, comes to an end. In such an event, as Krippendorf (1982, p.136) also stated, Green Road Projects has the potential to become an exemplary case where "tourism destroys tourism". From especially an eco-tourism perspective, we can not talk about the sustainability of the tourism practices if we can not talk about the sustainability of the environment and ecosystem services it provides. Especially unplanned tourism development increases the risks of collapse of the tourism destination.

Another important issue I would like to address is regarding the European Union Transport Policy, whic defines the purpose of a transport policy as ensuring that the society can meet its economic and social environmental needs (European Commission, 2006; 6). In this context, what needs and whose needs exactly does the Green Road Project really address does not have a clear answer. As one of the interviewees (no:5) also puts forward "neoliberal rationality", it is possible to argue that the Green Road Project seems to be carried out in accordance with the neoliberal development principles of the AKP period. It basically covers all the indicators of AKP-type neoliberalism (Erensü and Madra, 2020) as it is a project that prioritizes the construction sector, which is the locomotive of economic growth in the AKP period, where companies close to the state benefit from this work, and social, ecological and often economic burdens are left on the citizens. This amplifies the environmental justice problem, especially for stakeholders who are on the weak side of power relations.

One of the most questionable aspects of the Green Road Project is its legal dimension. Its legal basis was the most frequently mentioned issue in the arguments and interviews, mainly because the plateaus are in the status of pasture and it is illegal to use them for any other purpose. Article 4 of the Pasture Law states: "Pastures cannot be transferred to private property, cannot be used for other than their purpose, prescription cannot be applied, and their borders cannot be narrowed." (Mera Kanunu, p.2 1998). Furthermore, according to the pasture law, the expenses of restoring the pastures, whose have been deteriorated due to misuse, belong to who is responsible for this deterioration. (Mera Kanunu, p.2 1998), which brings fore the rather interesting case where the state (whose misusing the pastures and causing deterioration) would have to pay (to itself) for the future restoration expenses. Moreover, it is stated that the project is in violation of the provisions of the Law on Conservation of Cultural and Natural Assets No. 2863 and the National Parks Law No. 2873 (Kurdoğlu & Ünver, 2015). When we look at the legal action taken by the protesters, we can see that all the lawsuits filed against the project were won, but unfortunately, the implementation of the project could not be prevented.

The Green Road Project has generated many questionable issues and injustices regarding the fair distribution of benefits and impacts. However, for sustainable and nature-friendly tourism practices, environmental justice principles should be taken into account and included in the planning processes. In this sense, this exploratory study aimed to understand and reveal these issues so that an effective tourism policy understanding which is inclusive and centered on good governance rather than amplfying the conflicts, could be established, leading to a more equitable environment for stakeholders.

7. CONCLUSIONS AND FURTHER RESEARCH

As I mentioned before, tourism is a significant industry since it contributes to economies, especially in developing countries like Turkey. In addition to this, due to its tourism attractions, natural and cultural assets, Turkey has a high tourism potential. For this reason, tourism has been included in policies from the past to the present. It frequently appears in both national and regional policies, action plans and strategy documents. Especially after the 1980s, tourism development has been one of the main objectives of development plans and strategies. In the early 2000s, it can be seen that neoliberal development policies were emphasized with the new government. Tourism Master Plan 2007 is the fundamental document in the context of the national tourism development plan. Following this, DOKAP Action Plan 2014-2018 and DOKAP Regional Development Program 2021-2023 are the most important regional development policy documents related to my investigation. When I reviewed the DOKAP reports and policies, I discerned that tourism and transportation infrastructure development are the two most important focuses. The Green Road Project also emerged as a comprehensive project that combined these two points.

In this background and within the scope of this thesis, I tried to investigate the project from an environmental justice perspective. I mapped the perspectives of tourism stakeholders to the project and the policies carried out in the region in a theoretical framework. The findings, I believe, have shed light on the current situation in the region. This study approaches with both tourism and environmental sciences from a social perspective. In this sense, an interdisciplinary study will contribute to both tourism literature and environmental sciences.

Overall, this study reveals that the Green Road Project creates problems among different stakeholders. Stakeholders are polarized into two camps, they have different priorities, their interests are conflicted and there are many governance issues that need to be solved. The national government and the governing party are on one side of this conflict, while other stakeholders are on the other. While the national government defends the project for economic reasons, the opposing stakeholders have mainly ecological concerns. In addition to this, they claim that they are not recognized and that a participatory process is not carried out. Although the project poses problems in the region, the arguments of stakeholders reveals very few alternatives.

Although this thesis identifies a certain pattern about the complex nature of the conflicts, there are still many aspects that might be improved and/or that needs further research. First of all, I

addressed the issues between stakeholders from three dimensions, yet one can use a more detailed environmental justice framework addressing also the capabilities approach put forward by Sen (1985, 1999). Thus, it would possible to get more accurate results. Secondly, due to the pandemic, it was not possible to go to the field, so the interviews were always held online. Field visits and face-to-face interviews would provide more productive data. Lastly, despite the opposition, the Green Road Project has been largely completed, so it would be useful to conduct future ex-post assessments by taking this into account. Instead of discussing the project, it may be more productive to think about what can be the solutions for preventing the future impacts that the road might bring.

All in all, this thesis contributed to both the tourism and environmental justice literature in general, with important policy outcomes for the general tourism strategy of Turkey. In addition, it tried to point out the extent of the direct or indirect impacts of a tourism policy, the actors and needs to be recognized, and also it highlighted the difference between "making the policy" and "having a legitimate basis". From now on, I hope that policy makers will adopt a policy approach centering participation, collaboration, and consensus which are required for good governance.

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APPENDIX A: ARGUMENT LIST AND SOURCES

Argument ID	Arguments	Stakeholders	Source
1	Doğanın yeşilini, doların yeşiline çevirmeyi hedefleyen, talan ve yağmanın meşrulaştırılmış hali olan Yeşil Yol projesi, Rize İl Özel İdaresi Meclisi'nde yapılan itirazlara rağmen kabul edilmiştir.	Opposition Political Party (OPP)	2 mahkemenin iptal ettiği Yeşil Yol Projesi Rize'de devam ediyor, 7 Mart 2021 (Accessed 08.12.2021)
2	Madem bu yapılacak önce ben kullanacağım, benden habersiz oraya yolu yaptınız, eyvallah diyorum, yasal bir dayanağınız, hiçbir gerekçeniz olmadan. Bundan sonra orada olmam lazım ki benden habersiz oraya otel dikmeyin.	Local Residents	Yeşil Yol nedir? Karadeniz'de yayla turizmi projesi: "Yol dedikleri siyanürdür" 15 Aralık 2020 (Accessed 08.12.2021)
3	Turizm sektörümüzün daha yukarıya çekilmesiyle ilgili hedeflerimizin belki de en ortasında bu Yeşil Yol Projesi var.	National Government	Karadeniz Turizmine Yeşil Yol Dopingi (Accessed 08.12.21 / 2.42)
4	Halkı arkanıza alın, arkaya atma. Dedimizi dinle. Bir gün gelip derdimizi sordu mu? Yol yapacakmış. Nereye yol yapacak?	Local Residents	Karadeniz'in talanları: Gözyaşı Yolu (Accessed 08.1221 / 15.33)
5	Sen orada yaşayan halksın ve devlet denen yapı geliyor sana diyor ki; sen buralarda yaşıyorsun ama aslında buralar senin değil, buralar bizim. Buraya istediğimizi yaparız, gerektiği zaman seni çekip atarız	Local Residents	Karadeniz'in talanları: Gözyaşı Yolu (Accessed 08.1221 / 24.40)
6	Bu projede kanuna karşı hileler var, bunları dile getiriyoruz ve yapılamaz diyoruz.	Experts	Karadeniz'in talanları: Gözyaşı Yolu (Accessed 08.1221 / 33.00)
7	Doğu Karadeniz Projesi Bölge Kalkınma İdaresi Başkanlığı tarafından 2013 yılında Karadeniz Bölgesinde 9 ilin yaylalarını birbirine bağlayacak 2600 km uzunluğundaki Yeşil Yol projesinin pandemi sonrası bölge turizmine doping etkisi yapması bekleniyor.	Media	Karadeniz Turizmine Yeşil Yol Dopingi (Accessed 08.12.21 / 0.18)
8	Sona gelinen ve büyük oranda tamamlanan projede hukuki engellerin aşılmasıyla Karadeniz'de üst kotlardan yeşile yolculuk başlayacak.	Media	Karadeniz Turizmine Yeşil Yol Dopingi (Accessed 08.12.21 / 0.32)
9	Yeşil Yol tabi DOKAP kurulurken özellikle turizm ekseninde bölgeyi kalkındırmakla ilgili geliştirmekle ilgili bir hedef koymuştu.	National Government	Karadeniz Turizmine Yeşil Yol Dopingi (Accessed 08.12.21)

Argument ID	Arguments	Stakeholders	Source
10	Bu doğrultuda da Samsun'dan Artvin'e kadar Turizm Master planı hazırladı, Yeşil Yol bu Master Planı çerçevesinde yapılacak işlerden bir başlıktı, sayın cumhurbaşkanımız ve hükümetimiz bu konuyla ilgili bir hedef koydu, yani yayla koridorundan bir yol yapma hedefi koydu.	National Government	Karadeniz Turizmine Yeşil Yol Dopingi (Accessed 08.12.21)
11	Biz şimdi hızlı bir şekilde strateji bütçe başkanlığı, cumhurbaşkanlığımızdan bir kaynak aktarımı ile ilgili sürecimiz var, inşallah bu kaynaklarımızı alacağız ve bütün illerimizde işte büyükşehirlerde Büyükşehir Belediye Başkanlığı'yla, büyükşehirin olmadığı yerlerde İl Özel İdareleri ile hem sayın valilerimiz ile hem sayın belediye başkanlarımızla hem milletvekillerimizle oturup yola ne şekilde hangi düzeyde hangi oranda devam edeceğimize dair kararları hızlı bir şekilde alıp yola devam edeceğiz.	National Government	Karadeniz Turizmine Yeşil Yol Dopingi (Accessed 08.12.21)
12	Bölgemizi turizm ekseninde büyütmeyi hedefliyoruz.	National Government	Karadeniz Turizmine Yeşil Yol Dopingi (Accessed 08.12.21)
13	Bütün Karadeniz!i toplu değerlendirdiğimde bitkisel manadaki sanayi kuruluşları var ama bir sanayi şehri olamayız, ama turizm sanayisini geliştirebilir miyiz? Epeyce geliştirdik ve daha da geliştirebiliriz.	National Government	Karadeniz Turizmine Yeşil Yol Dopingi (Accessed 08.12.21)
14	Yaptığımız işlerde tarım da olacak, hayvancılık da olacak, bitkisel de olacak ama en önemli hedefimiz, hani uçak havalanmaya başlayan turizm sektörümüzün daha yukarı çekilmesiyle ilgili hedeflerimizin belki de en ortasında bu yeşil yol	National Government	Karadeniz Turizmine Yeşil Yol Dopingi (Accessed 08.12.21)
15	Bu bölgede turizm destinasyonlarının da desteklenmesiyle ilgili ayrıca bir süreç de yürüteceğiz inşallah bu süreçten sonra.	National Government	Karadeniz Turizmine Yeşil Yol Dopingi (Accessed 08.12.21)
16	Bu çalışmayla birlikte özellikle Doğu Karadeniz'deki turizm hareketliğinin, doğa turizmi ve yayla turizmi hareketliliğinin ciddi bir şekilde arttığını da görmekteyiz.	National Government	Karadeniz Turizmine Yeşil Yol Dopingi (Accessed 08.12.21)
17	2023 Eylem Planı çerçevesinde Hopa'dan Samsun'a kadar olan 9 ilde özellikle yayla ve doğa turizmi ile ilgili bir çalışma öngörülmektedir. Bu çalışmanın makro düzeydeki çalışması da DOKAP illeri kapsamında özellikle Turizm Bakanlığı ve ilgili paydaş kuruluşlarımızla Doğu Karadeniz turizm master planı hazırlanmıştır.	National Government	Karadeniz Turizmine Yeşil Yol Dopingi (Accessed 08.12.21)
18	Yöremize çok olumlu katkısı olacağını düşünüyoruz Gümüşhane'ye kadar uzanan bu yolun yayla turizmine çıkanların uğrak yeri olacağını düşünüyoruz.	Tourism Business	Yeşile Yolculuk Projesi / (DOKAP), 24 Temmuz 2021 (Accessed 31.12.2012)
19	Bu planlamanın içinde doğanın bozulmadan, doğaya uyumlu bir şekilde bölgesel bazda özellikle biz imar çalışmasına da başladık	National Government	Yeşile Yolculuk Projesi / (DOKAP), 24 Temmuz 2021 (Accessed 31.12.2012)

Argument ID	Arguments	Stakeholders	Source
20	Yeşil Yol, yeşil alanları yok eden, doğal yaşama zarar veren, doğanın dengesini bozan bir proje olması nedeniyle bizler tarafından desteklenmesi mümkün değildir. Doğu Karadeniz Projesi Bölge kalkınma İdaresi Başkanlığı'nın kamuoyuyla paylaştığı verilere bakıldığında, Yeşil Yol Projesi ile bölgedeki mevcut yatak kapasitesinin 24 binden 90 bine çıkarılması öngörülmektedir. Bunun anlamı açıktır: Proje, Karadeniz ormanlarının bağrına sokulan bir hançer olacaktır. Mevcut yatak kapasitesini yaklaşık dört kat arttırmak demek, binlerce metrekare inşaat sahası anlamına gelecek, binlerce metrekare yeşil alan yok edilecektir. Bırakalım inşaat mühendisliğinin toplumsal yarar ilkesini, Türkiye Cumhuriyeti'nin bir vatandaşı olarak, bu projeyi kabul etmek mümkün değildir.	Professional Chamber	Yeşil Yol Projesi İle İlgili Açıklama 23 Mayıs 2022 (Accessed 04.01.2022)
21	Yeşil Yol, doğaya zarar verecek olan ilk proje değildir. HES`lerden nükleer santrale, hava alanlarından boğaz köprülerine hemen her projede, çevreye verilen zarar önemsenmemektedir. Bu bir tercihtir.Ne yazık ki, siyasi iktidar tercihini doğadan, insandan yana kullanmamakta, rant beklentisi, yaşama tercih edilmektedir. İstanbul`da havalimanı için feda edilen Kuzey Ormanlarından sonra turizm rantı uğruna Karadeniz`in yeşili yok edilmek istenmektedir.	Professional Chamber	Yeşil Yol Projesi İle İlgili Açıklama 23 Mayıs 2022 (Accessed 04.01.2022)
22	Yeşil Yol Projesi, 3. Köprü, Cerattepe, Kanal İstanbul, HES'ler gibi saymakla bitmeyecek doğa katlıamlarına şimdi bir yenisi eklenmek isteniyor.	Professional Chamber	ODALARDAN DÜNYA ÇEVRE GÜNÜ AÇIKLAMALARI 05.06.2017 (Accessed 04.01.2022)
23	Ülkenin gündeminde olan; Samsun, Ordu, Giresun, Gümüşhane, Bayburt, Trabzon, Rize ve Artvin olmak üzere 8 ilin önemli yaylalarını ve turizm merkezlerini birbirine bağlayarak bölgenin turizm potansiyelini artırmak amaçlı olduğu söylenen 2600 kilometrelik Yeşil Yol Projesi ile; orman, mera, göl, dereler, milli park ve doğal SİT alanları geri dönüşü olmayacak şekilde zarara uğratılıyor, bu vahşi turizm anlayışı ile yaylaların büyük bir kısmının betonlaşmasının önü açılıyor. Plansız programsız, öngörüsüz HES`lerden sonra Doğu Karadenize bir darbe daha vurulmak isteniyor.r.	Professional Chamber	ODALARDAN DÜNYA ÇEVRE GÜNÜ AÇIKLAMALARI 05.06.2017 (Accessed 04.01.2022)

Argument ID	Arguments	Stakeholders	Source
24	Heyelan konusunda Karadeniz yapısı gereği tehlikeli bir bölgedir. Bu tür afetlere açıksa, önlenmesi ya da hasarın en aza indirmesi için alınabilecek önlemler nelerdir? Bu gibi zaten riskli olan bölgelerde zeminin yapısını bozacak müdahalelerden kaçınmak gerekirken, son yıllarda bu felaketi hızlandırmak için herkes elinden geleni fazlasıyla yaptı. Karadeniz'e ait ne varsa rant uğruna pervasızca saldırıldı. Yani işin özü, bugün yaşadığımız felaketin büyük bir kısmı insan eliyle yaratılmıştır. Bundan sonrası için bir şeyler söyleyebilmek için bu felaketin boyutlarını, sonuçlarını ve verilerini incelemek gerekiyor. Fakat ekosistemde yaratılan tahribatın sonuçlarının kısa vadede düzeltilemeyeceğini şimdiden söyleyebiliriz. Bu şekilde devam ederse Karadeniz'de çok daha büyük felaketlerin olacağından kimsenin şüphesi olmasın. Mevcut iktidar bu felaketlerden ders almak bir kenara, doğa katliamına daha da hız vererek yeşil yol çalışmalarını devam ettirmektedir. Bu yanlıştan biran önce vazgeçilmelidir. Bizim açımızdan karar veren, onay veren, gerçekleştiren ve savunan herkes sorumludur. Son 13 yıllık dönemde bu saydıklarımızın hepsi AKP iktidarının elinde olduğu için çevre felaketlerinin de baş sorumlusu AKPdir.	Professional Chamber	ODALARDAN KARADENİZ SEL FELAKETİNE İLİŞKİN AÇIKLAMALAR 25.08.2015 (Accessed 04.01.2022)
25	İktidarın Karadeniz yaylalarını gözüne kestirdiğini, geçtiğimiz yıl yapılmak istenen "Yeşil Yol Projesi"nden biliyoruz. Bu proje ile birlikte, binlerce yıldır el değmemesinden kaynaklı doğal olan yaylalar, sermayedarların daha fazla ilgisini çekecekti, öyle de oldu.	Professional Chamber	CERATTEPE'DEN SÜRMENE'YE KARADENİZ'DE YAĞMA SÜRÜYOR 09.01.2017 (Accessed 07.01.2022)
26	Burayı bozmadan nasıl ileri taşıyabiliriz, diye tartışır ve bu yaylaları elimizdeki son yaşam alanları olarak tanımlarken, bize hiç danışmamış olmaları, kendi planlarına göre donatmaları sağlıklı bir sonuç vermeyecektir.	Tourism Business	Bölgesel İdare ve Yerel Demokrasi Projesi Rize İstişare Toplantısı Notları 1 Kasım 2014 (Accessed 07.01.2022)
27	Bu orman herkesin ama T.C. yokken benim dedem koruyordu bu ormanı ve merayı. Yaylacılık yapmış insanların olur ve rızasını almadan, bu bölgede hiçbir proje yapılamayacaktır.	Tourism Business	Bölgesel İdare ve Yerel Demokrasi Projesi Rize İstişare Toplantısı Notları 1 Kasım 2014 (Accessed 07.01.2022)
28	Yeşil Yol Projesi, bizim turizmi kontrollü bir şekilde geliştirmemizin önünde bir engel, bu proje ile ilgili olarak bize en başından en sonuna kadar hiç görüş sorulmadı.	National Government	Bölgesel İdare ve Yerel Demokrasi Projesi Rize İstişare Toplantısı Notları 1 Kasım 2014 (Accessed 07.01.2022)
29	"Yeşil Yol" denen projenin bir kimliği, konsepti ve hedefi yok, geleceğe dair neyi amaçladığı belli değil Bütün yaylaları neden birbirine bağlıyoruz? Hareket amacı nedir? Yaylalarımız patlamak üzere ve bunu turizm olarak görmüyorum.	Local Residents	Bölgesel İdare ve Yerel Demokrasi Projesi Rize İstişare Toplantısı Notları 1 Kasım 2014 (Accessed 07.01.2022)

Argument ID	Arguments	Stakeholders	Source
30	Karadeniz, Hemşin ve özellikle Kaçkarlar'da turist sayısı her geçen sene artıyor. Burada turizm açısından yatırımların artması kaçınılmazdır. Yeşil Yol Projesi'nin sahibi olan bakanlık, "bu bir turizm projesidir" yorumu yaparken, Turizm Bakanlığı "Bizim bu konuda hiçbir bilgimiz yok," diyor. Oysa iki kurumun birbiri ile eşgüdümlü olması lazım. Burada bir iyi yönetişim eksikliği ve sorunu var, bu noktada halkın sorunlarının dinlenmesi gerekiyor.	Local Residents	Bölgesel İdare ve Yerel Demokrasi Projesi Rize İstişare Toplantısı Notları 1 Kasım 2014 (Accessed 07.01.2022)
31	Yeşil Yol Projesi'nin 2-3 MW'lık HES'lere ve madenlere ulaşma amacı taşıdığına inanıyorum. Karayolları girdiği yerleri yıkarak ilerliyor. Esas olumsuz değişme, yolun yapılaşmaya neden olacağı gerçeğidir. DOKAP yetkilileri burada neden yok?	Local Residents	Bölgesel İdare ve Yerel Demokrasi Projesi Rize İstişare Toplantısı Notları 1 Kasım 2014 (Accessed 07.01.2022)
32	Yeşil Yol Projesi'nin kırsal kalkınmaya katkı sağlayacağı söyleniyor, oysa hiçbir fizibilite çalışması yok. Meralarla ve hayvancılıkla ilgili bir kelime bile açıklama yer almıyor.	Local Residents	Bölgesel İdare ve Yerel Demokrasi Projesi Rize İstişare Toplantısı Notları 1 Kasım 2014 (Accessed 07.01.2022)
33	"Yayla turizmi"nden söz ediliyorsa, yerel ve ekolojik yönetimin ve üretimin yapıldığı bir turizm ile buradan para kazanılır ancak Yoksa her yer turizm mekânı olarak gelişir, şişmeye neden olur ve bir süre sonra çöker, çünkü orası tüketilmiştir. Aslında paranın başka noktada biriktiği ve yerele aktarılmadığı açıktır.	Local Residents	Bölgesel İdare ve Yerel Demokrasi Projesi Rize İstişare Toplantısı Notları 1 Kasım 2014 (Accessed 07.01.2022)
34	Ortadoğu'dan turist gelip yaylaları gezmek istiyorsa, ülke bazında bir gelir kazandıracaksa bu proje yapılır. Devlet gerekirse maden ocağı da yapar. Eskiden katırla gittiğimiz yerlere şimdi arabalarla gideceğiz, kimse kusura bakmasın.	Local Government	Bölgesel İdare ve Yerel Demokrasi Projesi Rize İstişare Toplantısı Notları 1 Kasım 2014 (Accessed 07.01.2022)
35	Bakanlıklar Ankara'dan, oturdukları yerden, hiçbir bilgi sahibi olmadan planlama yapıyorlar. Belli değerleri savunuyorsak, bu değerlerin sürdürülebilir olmasını da göz önünde bulundurmamız lazım. Zenginleşmeyi ne için gerçekleştireceğiz, ihtiyacımız için mi hayallerimiz için mi?	Local Residents	Bölgesel İdare ve Yerel Demokrasi Projesi Rize İstişare Toplantısı Notları 1 Kasım 2014 (Accessed 07.01.2022)
36	Şehir hayatını benimsemiş insanlar, oradaki düzeni ve konforu buraya taşımaya çalışıyorlar ve bunun bedelini bizler çok ağır ödüyoruz. Şuursuzca çalışmalar yürütülüyor, daha fazla lüks ve konfor adına Doğanın hakkını da her şeyden önce düşünmemiz gerekiyor; bizim dışımızda olan canlıların haklarını	Local Residents	Bölgesel İdare ve Yerel Demokrasi Projesi Rize İstişare Toplantısı Notları 1 Kasım 2014 (Accessed 07.01.2022)

Argument ID	Arguments	Stakeholders	Source
37	Biz turizmciyiz ama burada para kazanmak için otel işletmiyoruz. Biz buradaki değerleri yaşatmak istiyoruz. Yol, medeniyet değildir. Kendi yaylalarımıza giden yolları ve bunların sonuçlarını görüyoruz. Biz buraya geri dönen gençleriz ve burada yaşamak istiyoruz. Burayı 40-50 sene öncesine geri döndürmek istiyoruz.	Tourism Business	Bölgesel İdare ve Yerel Demokrasi Projesi Rize İstişare Toplantısı Notları 1 Kasım 2014 (Accessed 07.01.2022)
38	Yolları gördüğünüzde sürecin usulüne aykırı işlediğini, taşınması gereken hafriyatın dere yataklarına bırakıldığını görüyorsunuz. Yaşanan sellerin bir sebebi de bu durumdur. Fırtına Vadisi'nde daha fazla sel bekliyoruz çünkü en çok tahribatı bu bölge yaşadı."	Experts	İptal edilen Yeşil Yol Projesi: Avukat İbrahim Demirci ile söyleşi 17 Temmuz 2020 (Accessed 07.02.2022)
39	Bunlar plansız, programsız, hiçbir mühendislik bilimine dayanmayan, hiçbir doğayla uyumlu olmayan projeler. Bu projelerin sonunda büyük yıkımlarla karşılaşacağız diye ifade ettik, etmeye de devam ediyoruz ama bizim ifade etmemizin anladığım kadarıyla pek bir etkisi olmuyor.	Experts	Danıştay'ın Yeşil Yol'a yürütmeyi durdurma kararı vermesini Av.İbrahim Demirci değerlendiriyor 25 Ağustos 2020 (Accessed 01.07.2022)
40	Yeşil Yol Projesi, bakir olan yaylaları maalesef yapılaşmaya açacak, hatta açtı. Projenin geçtiği bütün yaylalarda konut yapımına başlandı. Ne yazık ki, Yeşil Yol bu işi çok kolaylaştırıyor. Bizler planlama yapmadan hiçbir şekilde o bölgenin sosyoekonomik, mekansal gelişmesini hiçbir şekilde düşünmeden proje uygulanmasına karşıyız.	Professional Chamber	YEŞİL YOL PROJESİNİ MASAYA YATIRALIM 28 Eylül 2020 (Accessed 07.01.2022)
41	Yeşil Yol; doğanın bakirliğini bozacak, ekosistemi boacak, yaylaları bugünkü güzelliklerinden çıkaracak ve plansız, programsız çirkin bir yapılaşmaya açacak. Bundan 5 veya 10 yıl sonra insanların görmek istemediği yerler haline gelecek ve doğallığın bozulmadığı yerler aranmaya başlayacak. Yaylalarda yolların yapılması gereken yerler de olabilir ama bunu planlı bir şekilde ortaya koymamız gerekir.	Professional Chamber	YEŞİL YOL PROJESİNİ MASAYA YATIRALIM 28 Eylül 2020 (Accessed 07.01.2022)
42	Bölgemizde yürütülmekte olan ve kendisi kadar sorunları da devasa olan bu proje hakkında kamuoyumuzun bilgisi, ne yazık ve ne vahimdir ki ilgililerin basın açıklamaları ve yapılan toplantıların sosyal medyadaki fotoğrafları, haberleri ile sınırlıdır.	Professional Chamber	Mahmutoğlu: Yeşil Yol'da 10 Cevapsız Soru 01 Mart 2015 (Accessed 07.01.2022)
43	Yeşil Yol projesi ile bölgede 696 milyon liralık yol yatırımı planlıyoruz. Karşılığında 3 milyar liralık katma değer elde edeceğimizi öngörüyoruz. Yeşil Yol ile bölgeye gelen insan sayısını 450 binden 1 milyon 275 bine çıkarmayı hedefliyoruz.	National Government	Yeşil Yol İstişare Toplantısı Gümüşhane'de Düzenlendi 16 Kasım2017 (Accessed 07.01.2022)
44	Limni Gölü bu sene 80 bini geçti. Karadeniz'in turizmini sadece Ayder'le, Uzungöl'le yapabilir misiniz? Yeni lokasyonlara ihtiyaç var. Gümüşhane yeni bir lokasyon. Gümüşhane artık turizme hazır. Gümüşhane'de hedefimiz 500 bin turisti ağırlamak.	National Government	Yeşil Yol İstişare Toplantısı Gümüşhane'de Düzenlendi 16 Kasım2017 (Accessed 07.01.2022)

Argument ID	Arguments	Stakeholders	Source
45	Gümüşhane ve Trabzon Valilikleri olarak milletvekillerimizin destekleriyle, belediye başkanlarımızın, siyasi parti temsilcilerimizin destekleriyle onbinlerce insanımızın yazın yaşadığı bu yaylalara bu hizmetlere kavuşturacağız.	National Government	Kadırga Yayla Şenlikleri Coşkusu 20 Temmuz 2018 (Accessed 07.01.2022)
46	Bu konuda(Yeşil Yol) çok ciddi, çok önemli bir potansiyel içeriyor bölgemiz. Arzu ediyoruz ki bu 25 projeden bugün kabul edilenlerin hayata geçmesi ile beraber turizm potansiyeli Kalkınma Bakanımızın da ifade ettikleri gibi bu proje ile ivme kazanacak. Doğu Karadeniz bir çekim merkezi haline gelecek. Burada da yaklaşık 18 milyon TL'lik bir destek verilecek. Eş finansmanlarla beraber. Bu 25 projenin az sonra bağımsız değerlendiriciler tarafından geçer not alanları 65 puan ve üzeri alınanları yönetim kurulumuz tarafından değerlendirilecek ve inşallah bunlarda hayat bulacak diye düşünüyorum	National Government	DOKA Yönetim Kurulu Toplantısı Gümüşhane'de Gerçekleştirildi 28 Haziran 2018 (Accessed 07.01.2022)
47	DOKAP Eylem Planı ile bölgemizde gerçekleştirilmesi amaçlanan en önemli eylemlerden birisi "Yeşil Yol güzergahı üzerindeki turizm yatırımlarının desteklenmesidir.	National Government	Karadeniz Turizmini canlandıracak Yeşil Yol Projesi'nde sona gelindi 22 Mart 2018 (Accessed 07.01.2022)
48	Dünyanın her yerinden insanlar gelsin(turizm artışı) Karadeniz'in yaylalarına aşık olsun, havasında şifa bulsun diye bu projeyi yapıyoruz	National Government	Davutoğlu 'Yeşil Yol'un sırrı'nı açıkladı: Doğaya ulaşıp rabbimize şükretmek için 20 Ekim 2015 (Accessed 07.01.2022)
49	Yaşam değerleri üzerinden rant devşirmeye ve günü kurtarmaya çalışan; hurafeler üzerinden halkı aldatma ve oyalama gayreti içinde olan; doğa ve kültür değerlerini savunan duyarlı yurttaşlara şiddet uygulayan; yargının iptal kararlarını yerine getirmeyen "kamu yöneticilerini" bu çıkmaz yoldan vazgeçmeleri için uyarıyoruz.	Professional Chamber	TÜRKİYE ORMANCILAR DERNEĞİ'NİN YEŞİL YOL PROJESİ HAKKINDAKİ GÖRÜŞLERİ VE HEYELAN İNCELEME RAPORU 7 Eylül 2015 (Accessed 07.01.2022)
50	Ey sevgili devlet, biz sana sevgili diyoruz ama sen betonu, asfaltı daha fazla seviyorsun. Çünkü beton ve asfaltın gittiği her yere, hemen ardından rant da gidiyor.	Media	ORDULU SPİKER KENDİNİ TUTAMADI, DEVLETE KAFA TUTTU! 15 Temmuz 2015 (Accessed 07.01.2022)
51	Ve gelinen noktada Adalet ve Kalkınma Partisi siyasal iktidarının hiçbir hassasiyeti dikkate almadan yaptığı uygulamalarına bir yenisi daha eklenerek yaylaların yeşil yol projesiyle birbirine bağlanması düşüncesini gerçekleştirmeye başlamıştır. Başbakandan valilere kadar hiçbir yetkili, doğal ekosistem kavramı üzerinde durmamış, hedef olarak yine mevcut yapıyı tahrip ederek kısa zamanda büyük rant sağlamaya seçmiştir.	Civil Society	TÜRKİYE ORMANCILAR DERNEĞİ'NİN YEŞİL YOL PROJESİ HAKKINDAKİ GÖRÜŞLERİ VE HEYELAN İNCELEME RAPORU 7 Eylül 2015 (Accessed 07.01.2022)
52	Yeşil yol projesi ile turist beklemek akılcı bir yol değildir. Tersine turistlerin geleceği alanlar tahrip edilmiş olur.	Civil Society	TÜRKİYE ORMANCILAR DERNEĞİ'NİN YEŞİLYOL PROJESİ HAKKINDAKİ GÖRÜŞLERİ 7 Eylül 2015 (Accessed 07.01.2022)

Argument ID	Arguments	Stakeholders	Source
53	Yeşil yolların ve yeni oluşturulacak turizm merkezlerinin bazılarının bölgede bulunan Kaçkar Dağları ve Altındere Vadisi Milli Parklarının içinden geçmesinin söz konusu olması, başta 2873 sayılı Milli Parklar Yasası hükümlerine aykırıdır.	Experts	
54	Turizm faaliyetleri başlı başına önemli çevre sorunlarının kaynağı olabiliyorken, ortalama eğimi %74 olan bir potansiyel turizm alanında 2600 km'lik yol planlamak, turizmi yok etme potansiyeli olan en öncelikli ve güçlü sorun demektir.	Experts	2023'e DOĞRU 3. DOĞA VE ORMANCILIK SEMPOZYUMU 26 Kasım 2016 (Accessed 07.01.2022)
55	Beni bu ülke niye okuttu? Oraya buraya gönderdi, doğa koruma ile ilgili ders verdiriyor, ama söylediğimizi yapmamakta gayet gurur duyuyor.	Experts	hYd - Rize - Yeşil Yol Toplantısı 24 Nisan 2015 (Accessed 07.01.2022)
56	Yol yapılması ile birlikte tüm yaylalar ortadan ikiye ayrılacak. Yayların ortasından açılan geniş yollar habitat bütünlüğünü bozacak ve doğa tahrip olacak. Kuraklıkla birlikte hayvan ve bitki çeşitliliğinin azalmasını göreceğiz	Experts	Yeşil Yol'a Tepkiler 08 Ağustos 2015 (Accessed 07.01.2022)
57	Kamu kuruluşlarının çağrıldığı halde gelmediği, ihaleyi üstlenen Valilerin bilgi vermekten kaçındığı, master plan'ında bile yolun nasıl yapılacağı muamma olan projenin şeffaflıktan ne kadar uzak olduğunu görüp kahroldum.	Media	Karadeniz'de yolun sonu: Yeşil Yol 22 Haziran 2015 (Accessed 07.01.2022)
58	Türlü gerekçelerle 'Yeşil Yol' adı altında, maden sahalarına yollar yapılarak binlerce yıldır oluşmuş doğal dengeler altüst ediliyor	Civil Society	ARTVİNLİ STK VE PLATFORMLARDAN BAKIRKÖY'DE BASIN AÇIKLAMASI 14 Haziran 2016 (Accsessed 07.01.2022)
59	Aksine bölge ekonomisine ciddi katkısı vardır. Yeşil Yol, bölgenin kaderidir. Bölgenin gelişmesi ve kalkınması için elzemdir. Dolayısı ile bundan sonraki süreçte yeşil yol projesi ya öyle ya böyle devam edecektir. Bu milletimizin hissiyatı ve ortak talebidir.	National Government	AK Parti Trabzon Milletvekili Salih Cora, 'Yeşil Yol Devam Edecektir' 6 Ağustos 2022 (Accessed 10.01.2022)
60	DOKAP olarak 2023 gibi bir hedefimiz var, bu hedef doğrultusunda bu yolu bitirmiş olacağız ve bölgeye çok önemli bir turizm altyapısı kazandırmış olacağız. Bu yıl yolun bin 300 kilometreye ulaşmasını bekliyoruz.	National Government	Karadeniz'in iç bölgeleri turizme hazırlanıyor 19 Mart 2019 (Accessed 10.01.2022)
61	Bütün bu yeşil yollarla aynı yere çıkıyor. Karadeniz bölgesinde turizm adı altında bölgeyi yağmalamaya yönelik bir sonuca doğru gidiyor. Niçin bölgenin turizm yapılanması adı altında yağmalanması diyoruz. Karadeniz yurttaşlarının ellerinden yaylalarını alıyorlar, evlerine el koymuşlar, yayla evleri ellerinden alınıyor onların yerine 'turistik tesis yapacağız' demişler ama görüyoruz ki 39 ayrı yerleşim yeri planlanmış. 39 tane şehir kurulacak demektir bu bölgeye. Bunların özelliği ne,	Opposition Political Party (OPP)	CHP'li Pekşen: Yeşil yol projesinde 1 değil, 3 ayrı yeşil yol var 26 Ağustos 2015 (Accessed 10.01.2022)

Argument ID	Arguments	Stakeholders	Source
	içerisine dilerseniz malikane, dilerseniz restaurant, meyhane, otel ve konut yapabilirsiniz. Dilediğinizi yapabilirsiniz.		
62	Bu projenin tüm detaylarını ortaya çıkaracağız ve projelerimizi ona göre oluşturacağız. Bizim odaklandığımız nokta orada ihtiyacın olup olmadığı, halkın ne düşündüğü ve ekolojiye vereceği zarardır. Bu araştırma en kısa zamanda neticeye ulaşacak diye düşünüyorum	National Government	Doğan'dan resmi 'Yeşil Yol' açıklaması 31 Ağustos 2015 (Accessed 10.01.2022)
63	İnşaat şirketlerinin mahkeme kararına rağmen, yasadışı çalışmalarla dağları talan etmeleri serbest, kepçelerin kafasına göre yol açması hürriyet. Ancak bizzat yaylalıların yurtlarına, meralarına sahip çıkması yasak. Haklarını araması, hukuka güvenip milli parkı, doğal siti korumaları suç	Civil Society	Şirketin yasa dışı çalışması serbest, yaylaya sahip çıkmak yasak' 6 Haziran 2017 (Accessed 10.01.2022)
64	Mahkeme 3 yıl boyunca adalet bekleyen bizleri adeta oyalamıştır. Bunlar olup biterken, yaylaları birbirine bağlayan proje de tamamlandı. Yargılama sürecine baktığımızda; mahkemenin, davaları bu kadar sürüncemede bırakarak, Yeşil Yol'un tamamlanmasına imkan tanıdığını görmekteyiz. Bu durumdan dolayı, adalet sistemine olan güvenimiz sarsılmıştır. Buna karşın, hukuka olan umudumuzu kaybetmiş değiliz. Yargısal süreç, bu ret kararına karşı Samsun Bölge İdare Mahkemesi nezdinde görülecek istinaf başvurusu ile devam edecektir. Mahkeme kararında bizi kaygılandıran asıl mesele şudur: Turizm faaliyetleri, 'kamu yararı' adı altında, doğaya yeğ tutulmuştur. 'Kamusal, kamu yararı' gibi kavramlar gerekçe yapılarak, toplumun müşterek varlıkları, değerleri önemsizleştirilmektedir. Bu tehlikeli bir anlayıştır. Zira; ormanlar, su kaynakları, meralar bir çok doğal alan, 'kamusal yarar' adı altında maden, turizm, inşaat gibi faaliyetler için gözden çıkarılmaktadır. Bu faaliyetlerin, yaşam alanlarına, doğaya verdiği zararlar ortadayken; bunları 'kamusal yarar' kavramıyla temize çekmek mahkemelerin görevi, işlevi olmamalıdır.	Civil Society	'Yeşil Yol'da karar çıktı; mahkeme davayı reddetti 03 Aralık 2018 (Accessed 10.01.2022)
65	Tepeden inme yollar, yükseklerin cazibesini hızla yitirmesine sebep olur, böyle bir coğrafyaya da kimse adım atmak istemez.	Tourism Business	Yeşil Yol Karadeniz'e Felaket Getirir 27 Ağustos 2013 (Accessed 11.01.2022)

Argument ID	Arguments	Stakeholders	Source
66	Tüm bunların uygulanması halinde bırakın Karadeniz'in turizm potansiyelini arttırmayı, Karadeniz'e herhalde bugüne kadar yapılmış kötülüklerin en büyüğü yapılmış olacak. Karadeniz bölgesindeki vadileri HES'lerle kurutmak yetmiyormuş gibi, derelerin ana kaynaklarının bulunduğu buzul gölleri seviyelerine kadar yolları çıkartmak, onları birbirine bağlayarak denetimsiz, kontrolsüz geçişlere zemin hazırlamak olsa doğayı öldürür.	Tourism Business	Yeşil Yol Karadeniz'e Felaket Getirir 27 Ağustos 2013 (Accessed 11.01.2022)
67	Bu bölgelerde Yeşil yol gibi doğayı tahrip edecek projeler gerçekleşirse bu doğanın en önemli unsuru da baltalanmış olacak. Biz bu tip talan projelerine ve doğadaki çeşitliliği, bitki örtüsünü değerlendirmeden gerçekleştirilmek istenen projelere karşıyız.	Civil Society	'Yeşil Yol'a Direnmekle Kalmadılar, Mevcut Yolları da Onardılar 19 Temmuz 2015 (Accessed 11.01.2022)
68	Mevcut bir yolun bakım ve onarımını yapmaktansa milyonlarca lira harcayarak yükseklerde etütsüz ve plansız bir şekilde yeni yollar açmak Yeşil Yol'da temel olarak karşı durduğumuz bir durumdur. Mahkeme kararları açıklanana kadar Yeşil Yol çalışmalarının durdurulmasını talep ediyoruz.	Civil Society	'Yeşil Yol'a Direnmekle Kalmadılar, Mevcut Yolları da Onardılar 19 Temmuz 2015 (Accessed 11.01.2022)
69	Yaylalarda paralel şekilde 2 bin 500 metrelerdeki yollara neden gereksinim duyulduğunu halka anlatsın. Gizli kapaklı ne yapılıyor? Kendi yolumuz yokken yaylaları birbirine bağlamanın anlamı nedir?	Civil Society	'Yeşil Yol'a Direnmekle Kalmadılar, Mevcut Yolları da Onardılar 19 Temmuz 2015 (Accessed 11.01.2022)
70	Projeyi son derece önemsiyoruz. Anadolu'da güzellikler oluyor. Bize düşen bu unu yağı şekeri helva yapmaya çalışmak. Doğu Karadeniz Turizm Odaklı Kalkınma Projesi ile amacımız, Karadeniz doğasını, yaylasını, denizini, dağını, taşını, ören yerlerini, taze bir mısır ekmeği lezzetinde hazırlamak, Türkiye ve dünyaya sunmaya çalışmaktır	National Government	Günay: Karadeniz'de "Yeşil Yolculuk" Projesi Yapacağız 11 Aralık 2011 (Accessed 11.01.2022)
71	Biz bu projeyle kaçak yapılaşmayı önleyeceğiz. Yaylalarda yapılanma onların iddia ettiğinin aksine disiplin altına alacak. Nasıl şehirlerde kentsel dönüşüm oluyorsa, kırsalda da bu projeyle kırsal dönüşüm olacak. Turizm alanı ilan edilen yerler turizme açılacak. Turistler gelse bizim yaylalarımızda kalsa bunun ne mahsuru var? Bunu anlamıyorum	National Government	TEMA'ya Yeşil Yol tepkisi 29 Haziran 2015 (Accessed 11.01.2022)
72	Yeşil Yol Projesi'ni çok önemsiyorum. Samsun'dan çıkan bir kişi, sahile hiç inmeden yaylalardan Sarp'a kadar gidebilecek. 9 vilayette 110 bin istihdam yaratacak bir proje. Trabzon'da eğitimin kalitesini artırmaya çalışıyoruz. TED koleji açılıyor. İkinci üniversiteyi düşünmemiz gerekiyor. Organize sanayilerde iş sahalarını artırmalıyız. Yatırımcıları desteklemeliyiz, bir de arsa üretmemiz lazım. Yol yapacağız ve arsaları yatırımcılara sunacağız.	National Government	Trabzon Milletvekili Faruk Özak bu sözleri neden söyledi? 13 Eylül 2014 (Accessed 11.01.2022)

Argument ID	Arguments	Stakeholders	Source
73	Kültür varlıklarımızı rant uğruna kaybetmemeliyiz. Yeşil Yol Projesinin bölgede ihtiyaç duyulmayan bir çalışma olduğu bilinmelidir. Tekrar değerlendirilmelidir. Şehirleşmeye, betonlaşmaya ve yeşilin yok edilişine dur denilmelidir. Tepkisiz kalma, tepkisizliğin yaşam alanlarının elinden alınmasına sebeptir	Civil Society	"Yeşil Yol" değil rant yolu: Talana sessiz kalma! 19 Haziran 2015 (Accessed 11.01.2022)
74	Bu proje ile yaylalar ve sahil kısmı birbirine bağlanacak. Bu da halkın çıkarına değil, maden araması yapmak isteyen şirketlerin çıkarınadır. Bu yollarla, çıkarılan madenlerin ulaşım noktalarına taşınması da kolaylaşacak	Civil Society	"Yeşil Yol" değil rant yolu: Talana sessiz kalma! 19 Haziran 2015 (Accessed 11.01.2022)
75	Bu Karadeniz'i talan etme projesidir, başka bir şey değildir. Köy sakinleri yoksullaştırılmaya itiliyor ve göç etmek zorunda kalacaklar. Proje derhal durdurulmalı bu yanlıştan dönülmeli	Professional Chamber	"Yeşil Yol" değil rant yolu: Talana sessiz kalma! 19 Haziran 2015 (Accessed 11.01.2022)
76	Bize kimse bilgi vermediği gibi kimse de danışmıyor. Soruğumuzda 'Mevcut yollar birbirine bağlanacak' deniliyor. Yolun detayları hakkında bilgi yok. Bazı yaylalar birkaç kilometre ile birleşebilir ancak gerçekten buna ihtiyaç mı? Kimse bunu tartışmıyor bile. Bu yollar 2 bin - 2 bin 500 irtifadan geçecek. Bazı yerlerde orman seviyesine inilerek orman kesilecek. Milli Parklar Genel Müdürü'ne sorduk. Konuyu bilmediğini söyledi. Geçilmesi zor geçitler var. Nasıl yol geçecek? Her yıl 5-6 metre kar yağıyor. Her yıl kapanan yollar açılacak mı? Yolları açarken çıkarılan hafriyat dağlardan aşağıya mı dökülecek? Benzin istasyonları olacak mı? Çok soru var. Yanıt yok.	Tourism Business	Yeşil Yol yeni bir imar dalgası mı? 26 Ağustos 2013 (Accessed 11.01.2022)
77	Yaylaların da ranta açılacağı endişesi var. Bazı duyumlara göre maden şirketlerinin işlerini kolaylaştıracak.	Tourism Business	Yeşil Yol yeni bir imar dalgası mı? 26 Ağustos 2013 (Accessed 11.01.2022)
78	Bu yol Ünye'den Yusufeli'ye kadar yaklaşık 1500 km uzunluğunda ve ortalama 2000 metre kotlarından geçecek bir yol. Güzergahı üzerinde doğal SİT alanları, milli parklar var. Yol, en başta doğanın kendini yenileme imkanı olmayacak kadar yüksek rakımlardan planlanmış. Bu yüksekliklerde doğa kendini rehabilite edemez. Biyolojik çeşitlilik bu yüksekliklerde son derece hassastır. En küçük değişimin etkisi insan ömründen çok daha uzun süre bu alanlarda maalesef görülecektir. Bu yüksekliklerde habitatlarda parçalanmanın neden olacağı çevresel etkiler ise ne yazık ki kimsenin umurunda değil. Bir ÇED süreci bile yürütülmeden harita üzerine cetvelle çizdikleri bir yolu planlayan bir akıldışılıkla karşı karşıyayız. Önce Karadeniz'i kayadeniz yaptılar, sonra vâdileri HES'lerle çöplüğe döndürdüler, şimdi de bugüne kadar	Experts	"Yeşil Yol" değil rant yolu: Talana sessiz kalma! 19 Haziran 2015 (Accessed 11.01.2022)

Argument ID	Arguments	Stakeholders	Source
	elleyemedikleri dağları parçalayacaklar. Bu yol ile ne yazık ki orman, mera, göl, dereler, milli park ve doğal SİT alanları geri dönüşü olmayacak şekilde zarara uğrayacak.		
79	Yeşil Yol projesinin bölgenin özel doğasını ve yaban hayatını riske atacak. Bu riskler yol çalışmaları sırasında doğaya verilecek zararla sınırlı değil. Asfaltla kaplanıp genişletilecek yollar, 40 farklı noktada turistik tesis inşaatlarına ve beraberinde ciddi bir yapılaşmaya da yol açacak. Yolların böldüğü yaşam alanları yaban hayvanlarının hayatta kalma mücadelesini de zorlaştıracak. Önemli bitki türlerinin geleceğini tehlikeye atacak. Doğal yaşam alanlarının yol ağlarıyla ve turistik tesislerin başı çektiği yerleşim bölgeleriyle parçalara bölünmesi de başta büyük memeliler gibi geniş alanlara ihtiyaç duyan yaban hayvanlarının ve kuşların yaşamını tehdit edecek. Hayvanların üremeleri, doğal alanlar arasında geçiş yapmaları, beslenme ve barınma alanları bulmaları zorlaşacak, insanlarla çatışmaları artacaktır.	Civil Society	Yeşil Yol Karadeniz'i Yoldan Çıkaracak (Accessed 11.01.2022)
80	Yeşil Yol projesi hayata geçirilirse Karadeniz kendine has özelliklerini yitirecek. Gelişen sürdürülebilir turizm çalışmaları darbe alacak.	Civil Society	Yeşil Yol Karadeniz'i Yoldan Çıkaracak (Accessed 11.01.2022)
81	Proje ile yaylalardaki yapılaşmaya bir düzen getirilerek, doğayla bütünleşmiş olacak. Kentsel dönüşüm gibi kırsal dönüşüm sağlanacak. Turizm merkezi ilan edilen yerler turizme açılacak, çirkin yapı görüntüleri iyileştirilecek. Doğaya saygılı, doğayla bütünleşmiş mini ahşap konaklama yerleri yapılacak. Lezzet durakları yapılacak, doğa hem korunacak hem de kullanılacaktır	National Government	Ekrem Yüce: Yeşil Yol, yeşile yolculuk projesidir! 14 Temmuz 2015 (Accessed 11.01.2022)
82	Halk bizim önümüzü açsın, biz yolu en iyi şekilde yaparız. Yaylaya yakışır bir yol yapacağız. Bu yol vatandaşın ufkunu genişletecek. Buradan yukarıya kaç kişi at ve eşeğe binerek yaylaya çıkar. Kaç kişi at ve eşek bakar? Bu yola karşı çıkmalarına gerek yok	Tourism Business	Yeşil yol için gelen iş makineleri geri döndü 7 Temmuz 2015 (Accessed 11.01.2022)

Argument ID	Arguments	Stakeholders	Source
83	NOT: İzin konusu sizi ilgilendirmez ()	National Government	Yeşil yol için gelen iş makineleri geri döndü 7 Temmuz 2015 (Accessed 11.01.2022)
84	Kanuna karşı hile yapılarak oluşturulmuş olan bir iki bin altıyüz kilometrelik yol projesi var. Kanuna karşı hile, küçük küçük ihalelerle yapılmıştır.	Opposition Political Party (OPP)	Yeşil yol için gelen iş makineleri geri döndü 7 Temmuz 2015 (Accessed 11.01.2022)
85	Davada yürütmeyi durdurma kararı verildi. Ancak, Danıştay'ın yürütmeyi durdurma gerekçeleri göz ardı edilerek, Ağustos ayında yeniden onaylanan ve geçtiğimiz ay askıya çıkartılan Çevre Düzeni Planı'nda, Yeşil Yol'a yeniden yer verildi. eşil Yol ile Samsun'dan Hopa'ya kadar Karadeniz yaylalarının yüksek rakımdan, denize paralel bir şekilde birbirine bağlanacağını ifade eden TEMA Vakfı Yönetim Kurulu Başkanı, bu güzergâhtan geçecek bir yolun nadir ve tehlike altında olan türlerin yaşam alanlarını tahrip edeceğine dikkat çekti.	Civil Society	CHP'li vekillerden Yeşil Yol hakkında açıklama 13 Temmuz 2015 (Accessed 11.01.2022)
86	Bakın sadece yolu o yaylalara yerleştirmek için diyorum. 286 kilometre karelik bu alan, 390 tane futbol sahasına denk geliyor. 390 futbol sahası genişliğinde bir ormanın ortadan kaldırılması ve yerine üzerinden vızır vızır arabaların geçtiği, bol karbondioksit salınımlı bir yol koyulması Peki amaç? Amaç daha çok para kazanmaktan başka bir şey değil. Oralara yapılacak olan otellerdeki geçici misafirler, tükettikleri yiyecekiçeçek, kullandıkları suyla beraber kalıcı kirliliğe yol açacaklar	Experts	'Yeşil Yol' dediğin, yeşili ezer geçer mi? 30 Aralık 2015 (Accessed 11.01.2022)
87	Karadeniz'de bir Yeşil Yol tartışması var. Proje Karadeniz için fırsattır. Ciddi bir yatırımdır. Yaylalarımızı birleştirecek proje, oradaki yapılaşmaların tam da Yeni Türkiye'ye yakışır hale gelebilmesini sağlayacaktır. Bir taraftan yurt dışından, bir taraftan kendi ülkemizden gelen insanların doğamızla buluşabileceği yatırım olanağı ortaya koyabilecek 'Yeşil Yol' ile ilgili yaygara koparmaya çalışıyorlar. Çok açık söylüyorum bir senaryo içinde yaygara çıkarıyorlar. Birleşik Haziran Hareketi yapıyor bunu. Birleşik Haziran Hareketi, bugün PKK'yı, KCK'yı meşrulaştırarak HDP'nin barajı aşabilmesi için oy devşirendir	National Government	Yeşil Yol Talimatı Vekilleri Gerdi 19 Temmuz 2015 (Accessed 11.01.2022)

Argument ID	Arguments	Stakeholders	Source
88	Birisi yeşil ranttan bahsediyor, birisi farklı farklı şeyler söylüyor. Bu anlayışlar yola, HES'lere, rüzgara, güneşe her şeye karşı oldular yıllardan beri. Şimdi Trabzon'da KÖYDES ödenekleriyle beraber kırsal alanda yaptığı başarılı hizmetlerde turizm patlaması yaşandı. Yerli ve yabancı turistlerin çekim merkezi olan Trabzon'da her yer doldu. Peki bunlar niye geliyor? Yollar olmasaydı Uzungöl'ün Arpaözü Köyü'ne insanlar nasıl gidecekti? Onlar sırtlarında yağ, peynir, çayır yükü taşımadılar. 15 - 20 kilometre yol yürümediler. Onlar yaylada yaşayan insanlarımızın çektiği sıkıntıları çekmediler. Yapılan yollardan, lüks arabalarla eyleme giderler. Rize'de hizmet alan insanlar imza topluyor ve yolun yapılmasını istiyorlar	National Government	Yeşil Yol Talimatı Vekilleri Gerdi 19 Temmuz 2015 (Accessed 11.01.2022)
89	Önemli bir turizm çalışmasıdır Yeşil Yol. Yollarımız zaten var sadece bağlantı noktasında eksiklikler var. Sümela Manastırı'na gitmiş olan bir turist tekrar sahil yoluna inmek zorunda kalıyor. Bunun içinde yeni bir proje gerçekleştirildi. Bunun yanlış yorumlanması çok yanlıştır. Kaldı ki bu yollar otoban gibi yapılacak yollar değil. Mevcut yolları birbirine bağlayan yoldur.	National Government	Yeşil Yol Talimatı Vekilleri Gerdi 19 Temmuz 2015 (Accessed 11.01.2022)
90	Yolu olmayan hiçbir yaylamız yok. Kamu ihalesi gereğince yol yapılacak bölge eğer özellik arz ediyorsa o zaman bunlara ilişkin Kültür Tabiatları Koruma Kurulu'ndan izin almanız gerekiyor. Yol yapmanız gerekiyorsa bu alan orman alanı ise izin almanız gerekiyor. Ne yapmışlar? 2 bin 600 kilometrelik projeyi bölmüşler. Kanuna karşı hile yapmışlar. Yol için 20 kilometrede ÇED raporu almak gerekiyor. 2 bin 600 kilometrelik yolun 19 kilometrelik kısmını ihale etmişler. Böylece ÇED raporu alınması gibi zorunluluklar pay pas edildi	Opposition Political Party (OPP)	Yeşil Yol Talimatı Vekilleri Gerdi 19 Temmuz 2015 (Accessed 11.01.2022)
91	Yeşil Yol ile alakalı Trabzon'da şu ana kadar geniş kapsamlı bir açıklama veya bir çalışma yapılmadı. Sivil toplum örgütleri bir araya gelerek elindeki çalışmaları birleştirmeli ve değerlendirme yapmalı. Bu değerlendirmeyi halkla paylaşmalı. Buna göre tutum belirlemeliyiz. Belki bir hizmettir, hizmete engel olmayalım. Belki bir katliam projesidir. Ona göre ses çıkartalım	National Government	Yeşil Yol Talimatı Vekilleri Gerdi 19 Temmuz 2015 (Accessed 11.01.2022)
92	Bunlar yola karşı diyorsunuz' Bu yol yol değil ki bu tam bir yolsuzluk. Peki yolsuzluğun arkasında kim var. O malum şahıs var. Yol ihalesinin yüzde 35'i bir arkadaşın elinde. Nasıl denk gelmiş bu yüzde 34. Yollar 19-15 bölümler halinde bölünüp ihale ediliyor bir kişiye denk geliyor	Opposition Political Party (OPP)	Yeşil Yol Talimatı Vekilleri Gerdi 19 Temmuz 2015 (Accessed 11.01.2022)

Argument ID	Arguments	Stakeholders	Source
93	4 saat Rabia Bekar ve yakınları ile Yeşil Yol konusunu konuştuk. Elbette onların yol konusunda bilgilendirilmemesi büyük eksiklik. Yol yapımından önce köylülerimiz ile bilgilerin paylaşmamız gerekirdi. Bu bizim eksikliğimiz ve Yeşil Yol konusunda halkımızı ve Bekar Ailesi'ni bilgilendirdim	National Government	Yeşil Yol Talimatı Vekilleri Gerdi 19 Temmuz 2015 (Accessed 11.01.2022)
94	Endemik bitki örtüsü kaybolmuştur. Yüksek bölgelerde ortamın yeşillik açısından eski halini alması uzun yıllar süreceği gerçeği bilimsel olarak bilinmektedir. Bu olumsuz durumun çözülmesi amacıyla yüksek rakımlarda kısa sürede ortamın yeşermesini sağlayacağını düşünülen endemik çim tohumu uygulama çalışması başlatılmasına ait tarım komisyonu çalışmalarını tamamlayamadığından komisyona ek süre verilmesi kabul edildi	Local Government	Yeşil Yol'da tahribata akıl almaz çözüm: Çim ekilecek 31 Ekim 2020 (Accessed 11.01.2022)
95	Yaylalar arası ulaşım koridorunun, özgün koşulları ve doğal çevresiyle yayla yerleşmelerinin öne çıkmaları yerine, yaylanın niteliğine aykırı bir biçimde yaylalar arasında yatay bir ilişki yaratarak yayla yerleşmelerinin özgünlüklerinin zayıflamasına sebebiyet vereceği sonucuna ulaşılmıştır	National Government	Yeşil Yol'da tahribata akıl almaz çözüm: Çim ekilecek 31 Ekim 2020 (Accessed 11.01.2022)
96	Gerçekten Karadeniz'e değer katacak, misafirlerimizin en iyi şekilde ulaşımlarını sağlayacak ve özellikle yayla turizmini geliştirecek önemli proje. Ordu içindeki 235 kilometrelik yolun 157 kilometresi sıcak asfalt ve beton yol olarak yapıldı, 36 kilometresinde çalışmalar devam ediyor. 41 kilometrelik kısmı stabilize duruyor. Amacımız bu yolu bitirmek, Karadeniz'i özlemle bekleyen tüm misafirlerimizin hizmetine sunmak istiyoruz. İlimiz sınırları içinde yapılacak çalışmaların maliyeti 40 milyon TL civarında. Bu maliyeti DOKAP, Büyükşehir Belediyesi ile Kültür ve Turizm Bakanlığı finanse ediyor. İlimizde projeye şuana kadar 16 milyon TL'lik harcama yapıldı. Türkiye'nin ulaşımda çok büyük devrim yaptığını hepimiz biliyoruz. Yeşil Yol tamamlandığında bölge turizmine çok büyük katkı sunacağını da düşünüyoruz	National Government	Yeşil Yol ile Karadeniz yaylalarına ziyaret arttı 29 Kasım 2018 (Accessed 11.01.2022)
97	Rize Çamlıhemşin'de yargı kararı tartışılıyor. Anılan bölge çok özel şartları olan yerlerden biri. Yolun tamamı 3000 kilometreye yakın. Doğu Karadeniz turizminin çok önemli parametresi. 33 turizm bölgesini birbirine bağlayacak. Yol tamamı ile iptal edildi açıklamaları doğru değil. Yıllardır 'yaylalarımızı değerlendiremiyoruz' sitemi malum. Bazı düzeltmeler olabilir. Olmalı da. Ancak bu tarihi hamleyi durdurma saçmalığına hep beraber hayır demeliyiz	National Government	AYKAN'DAN YEŞİL YOL'A DESTEK 2 Ocak 2017 (Accessed 11.01.2022)

Argument ID	Arguments	Stakeholders	Source
98	Oradaki vatandaşlar bu yolun bir an önce bitirilmesini istiyor. Projeden çok memnunlar. Zengin turistler bu bölgeye gelecek. Deniz turizminde bin dolar harcarken yayla turizminde gelen zengin turist 10 bin dolar harcıyor. Oradaki vatandaşlar bir an önce yapılıp bitirilmesini istiyorlar. Ama dışarıdan gelen provokatöre etmek isteyen insanlar buna karşı çıkıyor. Vatandaşımı dinleyelim yoksa 3-5 tane provokatörleri mi	National Government	BAKAN EROĞLU: 'YEŞİL YOL BÖLGEYE HAYAT VERECEK' 2 Ekim 2015 (Accessed 11.01.2022)
99	Yeşil Yol projesine ben taraftarım. Ne kadar ağaç kesilirse ben 100 katını dikeceğim. Zaten bu yolun yüzde 80'i ormandan geçmiyor. Şu ana kadar da bir ağaç kesilmiş değil. Yol ve su olmazsa medeniyet olmaz. Doğu Karadeniz'de turizm öncelikli bir gelişime, ihtiyaç var	National Government	Yeşil Yol'a Bakan yorumu! 25 Temmuz 2015 (Accessed 11.01.2022)
100	Yaylalarımızın doğal zenginliğine ulaşım açısından gerekli olan bir projenin hayata geçirilmesi bizleri son derece memnun etmektedir.Yeşil Yol Projesinin ilimiz açısından ayrıntılarını masaya yatırdığımız bu görüşmede taleplerimize olumlu yaklaşan DOKAP Başkanı Sayın Ekrem Yüce'ye sonsuz teşekkür ederiz.	Local Government	Yeşil yol projesi karadeniz'e hayat verecek 23 Haziran 2014 (Accessed 11.01.2022)
101	Fındıktan sonra bölgemizin gündeminde olan turizmde ulaşım altyapısında çığır açacak projenin Giresun ayağında önemli çalışmaların olduğunu görmekten dolayı son derece mutluyuz.Bu noktada Giresun Ticaret ve Sanayi Odası olarak Yeşil Yol Projesinde emeği geçen herkese teşekkür ederiz.	Professional Chamber	
102	Kadırga, Kazıkbeli ve Güvende yayla şenlikleri en önemlileridir. Böyle güzel yaylalarımız, geleneksel konukseverliğin de adresidir. Yürüttüğümüz çalışmayla yazın binlerce insanın akın ettiği Kadırga, Kazıkbeli, Güvende ve Erikbeli gibi önemli yaylalarımız tozdan kurtarılacak, ziyaretçiler yaylaların tadını sorun yaşamadan çıkaracak	National Government	Yeşil Yol Projesi 6 Temmuz 2014 (Accessed 11.01.2022)
103	Yeşil Yol projesi en kısa sürede tamamlanarak markalaştırılacak. Yol güzergâhında yer alan turizm bölgelerinin planlama çalışmaları kısa sürede tamamlanarak özel sektör yatırımlarına hazır hale getirilecek. Bu sayede bölgenin her mevsimde turist çekebilen, turistik aktivitelerin yapılabildiği, ülkemizin en önemli turizm merkezlerinden biri haline gelmesi sağlanacak. Yeşil Yol üzerinde yer alan turizm amaçlı tesislerin yapılması ve iyileştirilmesi desteklenecek.	National Government	Yeşil Yol projesinin hedefi Arap turistler mi? 15 Temmuz 2015 (Accessed 11.01.2022)

Argument ID	Arguments	Stakeholders	Source
104	Yeşilin içinden geçecek 2 bin 600 kilometrelik bir yolda ÇED uygulanmayacak da nerede uygulanacak? ÇED'in sadece çevresel değil sosyal etkiyi de kapsaması gerekiyor. Köylülerin, Havva Anaların yaşam biçimi değişmek zorunda kalacak. Kültürel çeşitliliğe etkisi olacak. Bu iki değerlendirme de yapılmadı. Bu kadar tepkiye rağmen Çevre ve Şehircilik Bakanlığı ile Orman ve Su İşleri Bakanlığı'nın hiç sesi çıkmıyor. Devasa bir proje olduğu için etkisi çok büyük olacak. Bu yol nereden geçecek, hangi malzemeler kullanılacak, kaç makine kullanılacak, hafriyat nereye dökülecek gibi soruların cevapları yok. Projenin sonu Ayder ve Uzungöl'deki gibi betonlaşma olacaktır. Turist gelsin diye yapılan proje, turistin gelmediği bir Karadeniz'in önünü açacak.	Professional Chamber	Yeşil Yol projesinin hedefi Arap turistler mi? 15 Temmuz 2015 (Accessed 11.01.2022)
105	Öncesinde de birçok yargı kararı mevcut. Ancak buna rağmen, halen Karadeniz yaylalarında yol yapım çalışmaları devam ediyor. İmar affi çıkarılınca meralık, ormanlık alanlarda bir anda inşaat alanlarına döndürüldü. Bunlar, vatandaş yerel yönetimi dinlemiyor, çok ısrar ediyor, Belediye Başkanları direnemiyor sözleriyle tarif edilemez. Burada ciddi bir suç var. Bir kısım yerel bürokratlar ve müteahhitler iştirak halinde, yaylaları katlediyorlar. DOKAP bu suçun finansmanını sağlıyor. Neticesi, insanların yaşamına mal oluyor. Bu projenin durması, bu katliamı yapan kişilerin yargı önüne çıkarılması gerekiyor. Kamu kaynaklarını bu katliama finans olarak sunanlara rücu edilmesi gerekiyor. Pişmanlık bir ifade biçimi değildir, aynı zamanda eylem gerektirir	Opposition Political Party (OPP)	"Erdoğan sözünde samimiyse Yeşil Yol projesini iptal eden yargı kararlarını uygulasın" 1 Eylül 2020 (Accessed 11.01.2022)
106	Kendi özgün koşulları ve doğal çevresi ile yayla yerleşmelerinin öne çıkmaları yerine, yaylanın tanımı ve niteliğine aykırı bir biçimde yaylalar arasında yatay bir ilişki yaratarak yayla yerleşmelerinin özgünlüklerinin zayıflamasına sebebiyet vereceği sonucuna ulaşılmıştır	National Government	Yeşil Yol Projesi'ne 2 mahkemeden iptal kararı çıktı 13 Temmuz 2020 (Accessed 12.01.2022)
107	Karadeniz'in kültürünü, doğasını, yaylalarını yapılaşmaya açacak, tarım alanlarını yok edecek, oradaki ekosistemi ortadan kaldıracak bir proje. Bu proje, Karadeniz'in güzelliğini, Karadeniz'in kültürünü, Karadeniz'in tarımını ve hayvancılığını, özellikle arıcılığını ortadan kaldıracak olan bir proje. Bu projenin uygulanmaması, yargı kararlarına uyulması ve ortadan kaldırılması gerekiyor. Ben bir Karadenizli olarak, Karadeniz'in incisi, en güzel belediyesinin başkanı olarak, Karadeniz'in temsilcisi olarak Türkiye'yi yönetenlerden bu projeden vazgeçmelerini talep ediyorum	Local Government	Karadeniz'deki CHP'li belediyeler 'Yeşil Yol'a karşı: "Proje, açık cezaevi duvarı demek" 29 Ağustos 2020 (Accessed 12.01.2022)

Argument ID	Arguments	Stakeholders	Source
108	Daha önce sahil yolu ile denizle bizlerin arasına duvar örenler şimdi yaylalarımızla duvar örüyorlar. Yaylacılık bir kültürdür, yaşam tarzıdır. Yayla, aslında insanların geçim ve hayata bağlanma yeridir. Yeşil Yol ile denizden, dağlarımızdan, yaylalarımızdan kopuş anlamına gelecektir	Local Government	Karadeniz'deki CHP'li belediyeler 'Yeşil Yol'a karşı: "Proje, açık cezaevi duvarı demek" 29 Ağustos 2020 (Accessed 12.01.2022)
109	Yapılan bütün çalışmalarda her kesimin görüşünün alınmasını çok kıymetli, değerli buluyoruz. İnsanlarımız yaylaya dinlenmeye, yeşille, doğayla baş başa kalmak için gidiyorlar. Yeşil ile doğanın arasında beton yığınlarının olmamasına hep beraber özen göstermemiz gerektiğini düşünüyorum. Yeşil Yol çalışmaları yeniden gözden geçirilmeli, toplumum hassasiyetleri göz önüne alınarak yeniden değerlendirme yapılmalıdır. Yolun her türlüsünün yanındayız ancak betona ve betonu zenginlik olarak gören anlayışa karşıyız	Local Government	Karadeniz'deki CHP'li belediyeler 'Yeşil Yol'a karşı: "Proje, açık cezaevi duvarı demek" 29 Ağustos 2020 (Accessed 12.01.2022)
110	(Durdurma kararı için) Bu kararla beraber yaylalarımızın kültürel ve doğal yapısı daha çok korunacaktır. Yaylalarımızı ziyaret eden vatandaşlarımızı daha güzel bir şekilde ağırlayacağız. Yaylalarımız asfalttan, betondan kurtulmuş olacak ve insanların her geçen gün aramış olduğu doğal güzellikleri korumuş olacağız. Yaylalarımız gizli hazinelerle dolu. Eğer bu karar uygulanırsa vatandaşlarımızın da o bölgedeki o güzellikleri görmeleri iyi olacaktır	Local Government	Karadeniz'deki CHP'li belediyeler 'Yeşil Yol'a karşı: "Proje, açık cezaevi duvarı demek" 29 Ağustos 2020 (Accessed 12.01.2022)
111	(Durdurma kararı için) Kararı yok sayarak, yasaya aykırı olarak yapılan çalışmalar acilen son bulmalı ve yargı kararı uygulanmalıdır. Doğal dengenin bozulmasının faturasını çok ciddi kayıplarla ödemekteyiz. Bu sebeplerden dolayı deremize, ormanımıza, yaylamıza, yaşam alanlarımıza sahip çıkıyoruz ve Danıştay kararının uygulanmasını istiyoruz	Local Government	Karadeniz'deki CHP'li belediyeler 'Yeşil Yol'a karşı: "Proje, açık cezaevi duvarı demek" 29 Ağustos 2020 (Accessed 12.01.2022)
112	Hukuku ve bilimi hiçe sayarak yapılmak istenen projenin ilk etabı olan yolların inşası büyük oranda tamamlanmış olsa da; bundan sonra yapılması düşünülen, aslında yaylaları ve meraları tamamen yöre halkının elinden alarak sermayeye teslim etme projeleri de durdurulmuştur	Civil Society	STK'lardan Yeşil Yol çağrısı: Danıştay kararı uygulansın, yaylalara dokunulmasın 24 Ağustos 2020 (Accessed 12.01.2022)
113	Doğu Karadeniz yaylalarının niteliğini bozacak Yeşil Yol Projesi, Danıştay kararıyla durduruldu. Kararı yok sayarak yapılacak yasaya aykırı çalışmalar, acilen son bulmalı, yargı kararı uygulanmalıdır. Sonra pişman olma şimdi destek ol ki, yaylalar yayla kalsın! #YaylamaDokunma	Opposition Political Party (OPP)	(Accessed 12.01.2022)

Argument ID	Arguments	Stakeholders	Source
114	"Anayasa madde 56 – Herkes sağlıklı ve dengeli bir çevrede yaşama hakkına sahiptir. Çevreyi geliştirmek, çevre sağlığını korumak ve çevre kirlenmesini önlemek devletin ve vatandaşların ödevidir. Artık yeter! Bu coğrafya daha fazla yıkım kaldırmaz"	Local Government	(Accessed 12.01.2022)
115	Danıştay Yeşil Yol Projesi'ne yürütmeyi durdurma kararı verdi. Yeşil Yol Projesi ile yapılan çalışmalar, doğal yaşlı ormanlarda ve yaban hayatında büyük yıkımlara yol açtı. Artık yeter, bu coğrafya daha fazla yükü kaldıramaz!	Local Government	(Accessed 12.01.2022)
116	Yaylaları ortadan kaldıracak Yeşil Yol Projesi Danıştay kararıyla durduruldu. İdare Danıştay kararına uymuyor. Yaylalarımızı tamamen yok edecek tesisleşmeye geçiliyor. Yargıya rağmen sürdürülen çalışmalar derhal durdurulsun. Destek ol, yayla yayla kalsın!	Opposition Political Party (OPP)	(Accessed 12.01.2022)
117	Hiç kimse kendi yaylasına kendi doğasına doğup büyüdüğü topraklara yabancı kalmamalı. Hayvanlarımızı otlattığımız yaylacılık ettiğimiz yeşilliklere Lüx oteller, restoranlar istemiyoruz.	Local Residents	(Accessed 12.01.2022)
118	Yeşil Yol gerçekleştiği takdirde Karadeniz dağları, ormanları, meraları, su varlıkları, flora ve faunasının geri dönüşü olmayacak bir şekilde zarar göreceğine dikkat çekti	Civil Society	TEMA Vakfı'ndan 'Yeşil Yol' tepkisi 15 Temmuz 2015 (Accessed 12.01.2022)
119	Burası (Samistal) granit rezervinin üstünde oturuyor. Dolayısıyla çevredeki HES'lerden de yararlanarak buradaki maden işletmelerini çok rahatlıkla işletebilirler. Yayla yol projelerine baktığımızda çok yüksek rakımlarda bütün bu maden rezervlerinin üstünde cirit attıklarını görüyoruz. Onun için yaylalara çıkan yolları iyileştirmek, halkın ulaşımını sağlamak yerine başka bir amaçla bu yolların yapıldığı çok açık. Biz bu amacı, buraları en iyimser anlamda 'turizm alanlarına çevirmek' olarak okuyoruz. Bu da buraların otel kompleksiyle dolması anlamına geliyor.	Opposition Political Party (OPP)	Yeşil Yol Projesi' için tartıştılar 22 Temmuz 2015 (Accessed 12.01.2022)
120	Biz yola karşı değiliz" diyen Çorbacı, "Niçin yıllarca gelmediniz de şimdi geliyorsunuz? Yolun yapılması sayesinde 35 sene, 50 sene sonra yaylayı gelip görebilen insanlar var. İnsanlar ağlıyordu 'gidip göremiyoruz	Local Residents	Yeşil Yol Projesi' için tartıştılar 22 Temmuz 2015 (Accessed 12.01.2022)

Argument ID	Arguments	Stakeholders	Source
121	Yeşil Yol Projesi için bazı kesimler itiraz etti, tabiatın tahrip edildiğini söyledi. Biz Karadeniz'de yayla turizmini geliştirmek maksadıyla oradan geçimini sağlayan insanlara daha iyi şartlarda hizmet vererek, vatandaşlarımızın daha çok kazanç elde etmeleri için bir proje geliştirdik. Şimdi de 10 bin fidanı yol güzergahlarına diktik. Güzergah boyunca fidan dikimlerine devam edeceğiz. Karadeniz'e yakışır bir yeşil yolu insanlarımızın kullanımına sunacağız.	National Government	Yeşil Yol Projesi güzergahına 10 bin fidan dikildi 10 Kasım 2016 (Accessed 12.01.2022)
122	Biz Fırtına Vadisi halkı olarak adı yeşil ama özü kara olan bu yolun vadimize felaket getireceğini biliyoruz. Bu sebeple yola itiraz ediyoruz. Yeşil yolun bir ihtiyaç olmadığını biliyoruz. Fırtına Vadisi'nde her yaylanın yolu vardır. Yolun olduğu yerde yeni yolların açılmasına gerek yoktur. Araç trafiğinin artacağından ve doğayı parçalayacağından yeşil yola karşıyız	Civil Society	Rize'de "Yeşil Yol Projesi"ne protesto 13 Temmuz 2015 (Accessed 12.01.2022)
123	Danıştay Yeşil Yol Projesi'ne yürütmeyi durdurma kararı verdi. Yeşil Yol Projesi ile yapılan çalışmalar, doğal yaşlı ormanlarda ve yaban hayatında büyük yıkımlara yol açtı. Dereme, ormanıma, yaşam alanlarıma ve #yaylamadokunma Destek ol; yayla, yayla kalsın!	Local Government	(Accessed 12.01.2022)
124	Karadeniz'in yaylaranın yok edildiğini düşünsenize Yargı dur demiş olmasına rağmen proje devam ettirilmeye çalışılıyor. Projenin ilk etabında yayla yolları tamamlandı. İkinci etapta yaylaların tamamen yok olmasının önünü açacak tesisleşmeye geçilecek. #YaylamaDokunma	Civil Society	(Accessed 12.01.2022)
125	Yeşil Yol Projesi Karadeniz'de doğayı, ormanları, yaylaları yok ediyor. Mahkemelerin durdurma kararına rağmen bakanlık projede ısrar ediyor. Karadeniz'in yaylaları sermayeye peşkeş çekilemez. AKP iktidarı Karadeniz'den, yaylalardan elini çekmelidir. Yeşil Yol Projesi'nden derhal tümden vazgeçilmelidir. Yaylalar tümden koruma altına alınmalıdır.	Opposition Political Party (OPP)	(Accessed 12.01.2022)
126	Karadeniz'e özgü geleneksel yaşamın evsahipliğinde yürütülen ekolojik turizmin bitirilerek, yeni yapılacak 40 turizm merkezinde 100 bin yatak kapasitesiyle turizm gelirlerinin bölge halkı yerine belli sermaye gruplarına aktarılmasının adıdır #yesilyol #yaylamadokunma	Civil Society	(Accessed 12.01.2022)

Argument ID	Arguments	Stakeholders	Source
127	Memlekette talan edilmedik ne bir ırmak,ne bir yayla,ne bir orman, ne de bir koy bıraktınız. Ne yargı kararı tanıdınız ne de bir hukuk kuralı. Bize ne yaşam alanı, ne de nefes alacak bir ülke bıraktınız! Artık Yeter #YeşilYolaDurDe #yaylamadokunma	Opposition Political Party (OPP)	(Accessed 12.01.2022)
128	Danıştay Dur dedi. Yeşil Yol Projesi ile yapılan çalışmalar, doğal yaşlı ormanlarda ve yaban hayatında büyük yıkımlara yol açtı. Artık yeter, bu coğrafya daha fazla yükü kaldıramaz!	Opposition Political Party (OPP)	https://twitter.com/hashtag/YaylamaDokunma?src=hashtag_click (Accessed 12.01.2022)
129	#YaylamaDokunma Bakmayın adına yeşil yol denmesine, Aslında neden oluyor doğanın katline, Sonra soruyoruz Rize'de Trabzon'da neden sel oluyor diye #yaylamadokunma	Experts	(Accessed 17.01.2022)
130	Danıştay Yeşil Yol Projesi'ne yürütmeyi durdurma kararı verdi. Danıştay'ın "Yeşil Yol Projesi" ile ilgili verdiği karar uygulanmalıdır. Doğaya verilecek zarardan bir an önce vazgeçilmelidir. #yaylamadokunma #dengemibozma	Civil Society	(Accessed 17.01.2022)
131	Karadeniz'deki yaylalara yol yapıyoruz diye bir çok orman ve mera alanı ve yerleşik yayla kültürü yok ediliyor. Oysa ki bu yaylaların hali hazırda yolları var. Çamlıhemşin'in, Kazdağları'nın, Salda Gölü'nün, Munzur'un varlığına ihanet projelerinin önlenmesi en başta Çevre ve Şehircilik Bakanının görevi iken inşaat sektörünün temsilcisi gibi hareket eden Bakan, kuşaklararası eşitliği ve anayasal sorumluluğu yok sayıyor, halkın taleplerini görmezden geliyor. Ziyaretçi akınının tahribatlarının geri dönülmez boyutta olduğu bölgede neden Yeşil Yol diye adlandırılan projenin yapılması gerektiğine dair gerçekçi ve somut gerekçe söyleyemiyor.	Opposition Political Party (OPP)	Yeşil Badanalı Rant Yolu: "Yeşil Yol" 7 Eylül 2019 (Accessed 17.01.2022)
132	Nasıl bir mantıktır anlamak mümkün değil. Bir yandan doğayı korumak , rezillikleri ortadan kaldırmaktan söz ederken öte yandan aynı anda, aynı coğrafyada HES çılgınlığı ve yeşil yol adı altında doğa katliamı yapmak en hafif deyimle akıl tutulması değil de nedir? Daha şimdiden şahsen bildiğim yeşil yol güzergahında üç adet ''maden arama ruhsatı'' verilmiştir. Bu halkın aklıyla alay etmektir. Belli ki yerli ve yabancı ''yeşil-yandaş sermayeye' alan açma faaliyetleriyle karşı karşıyayız.	Local Government	Çamlihemşin'in Sosyalist Belediye Baskani Lutfu Melek Ayder'deki Durumu Degerlendirdi 20 Ağustos 2017 (Accessed 17.01.2022)

Argument ID	Arguments	Stakeholders	Source
133	Yaklaşık 4 bin kilometrelik bir uzunluğa sahip projenin 650 kilometreye yakın bir bölümü Rize sınırları içerisinde. Bu projeyle bölgemizdeki doğal güzelliklere yerli ve yabancı turistlerin kolayca ulaşabilmelerini sağlamayı amaçlıyoruz. Yaylalarımızda talebe cevap verecek tesislerin kurulmasıyla, tüm bölgemizle birlikte Rize'yi de her mevsim cazip bir turizm merkezi haline getirecek adımları atmakta kararlıyız. Kim ne derse desin, biz bu adımları atacağız	National Government	Ayder ve Uzungöl'e kentsel dönüşüm geliyor 20 Mayıs 2015 (Accessed 17.01.2022)
134	Şimdi yeniden geldiler ve kaldıkları yerden devam etmek istediler. Biz de engel olduk. İzin belgelerini ve projeyi gösteremediler. İzin belgeleri olmadan burada yol yapmaya çalışıyorlar. Yolu buradan geçirmeyeceğiz. İzinsiz yol yaptıkları için suç işliyorlar. Yaylamızı, çocukluğumuzu koruyoruz.	Civil Society	Yeşil Yol'da iş makinalarına geçiş yok! 9 Eylül 2015 (Accessed 17.01.2022)
135	(Yeşil Yol bağlamında) Gerçekten bir bütün alt yapı ihtiyacını karşılamak ve dağların imkanlarını insanlarımızla buluşturmak için çalışıyoruz. Kaçkarlar, Doğu Karadeniz'in kalkınma hamlesi için yeterlidir. Kendi bünyesinde yeterince potansiyel taşıyor. Dört mevsim boyunca güzel bir imkan ve potansiyel var. Ülkemize verilmiş bir imkan ve nimet. İnşallah bunu değerlendirip insanımızın hizmetine sunacağız.	National Government	Kaçkar Dağları'na Türkiyenin en büyük kayak tesisi yapılacak 14 Kasım 2016 (Accessed 17.01.2022)
136	Adına Yeşil Yol denen bu hukuksuz çalışma, HES ve taşocakları gibi projelerle giremedikleri vadilerimize bacadan sızma çabasıdır	Civil Society	Yeşil Yol karşıtları durdurma kararını değerlendirdi: Yeşil Yol iyice tartışmalı hale geldi 10 Aralık 2015 (Accessed 17.01.2022)
137	"Yeşil Yol önem verdiğimiz bir güzergâh. Doğu Karadeniz bölgemiz alternatif turizm açısından çok büyük bir öneme sahip. Özellikle Körfez ülkelerinden gelecek katma değeri çok daha yüksek bir turizm potansiyeline hitap ediyor. Yapılacak bu güzergâhın orta vadede uluslararası bir marka haline gelmesini bekliyoruz. Bu proje ile Doğu Karadeniz bölgemiz sadece yolları ile değil, konaklama tesisleri, ticari alanları ile hizmet sektöründe gelecekte turizm alanında çok daha büyük bir cazibe merkezi olacaktır	National Government	Yaşam Alanıma Dokunma - Yeşil Yola Dur De- Sempozyumu page.16 (Accessed 21.03.2022)

Argument ID	Arguments	Stakeholders	Source
138	Yeşil yol gerçekten bir kezzap olup o yörede yaşayan; yani Samsun'dan Artvin'e yüksek kotlarda yaşayan yerel insanların suratına atılacaktır. Bu süreç içerisinde bunu yedire yapacaklar. Orada ki insanlar göçmen durumuna düşecektir. Oranın üvey evladı durumuna düşecektir ve şimdikinden daha zor şartlarda yaşamak zorunda kalacaklardır. Özellikle yeşil yol üzerine düşünmesi gereken küçük işletmecilik yapanlar veya yapmayı düşünenlerdir. Gelecekte tasfiye olacaklardır.	Media	Yaşam Alanıma Dokunma - Yeşil Yola Dur De- Sempozyumu page.128 (Accessed 21.03.2022)
139	yerel örgütlenmeler halkla bütünleşip ve yerel yönetimlerini de işe koşup bir acil eylem, bir de uzun vadeli kalkınma planı yapmalıdır. Gerekli tedbirler alınmazsa yerel yaşam kaynakları büyük sermaye sahiplerinin eline geçecek ve halk kendi toprağında sığınmacı olarak yaşamını sürdürmek zorunda kalacaktır.	Local Residents	Yaşam Alanıma Dokunma - Yeşil Yola Dur De- Sempozyumu page.140 (Accessed 21.03.2022)
140	Neresinden bakarsanız bakın Yeşil Yol, topluma refah ve huzur getireceğiz diyerek yaylaları talan etme projesidir. Bunu hepimiz biliyoruz, bu çok net. Altta zaten kocaman bir sahil şerit yolu var, o yeter bize.	Media	Yaşam Alanıma Dokunma - Yeşil Yola Dur De- Sempozyumu page.155 (Accessed 21.03.2022)
141	Yeşil Yol adı altında, büyük bir doğa ve kültür katliamı yapmak istemektedirler. Bölgeyi kitle turizmine açmanın getireceği yıkımı görmezden gelip, yüzyıllar içinde denge içinde gelişmiş insan-doğa dengesini yok etmek istemektedirler.	Media	Yaşam Alanıma Dokunma - Yeşil Yola Dur De- Sempozyumu page.6 (Accessed 21.03.2022)
142	Doğal" süreç, ortam ve varlıkla ile her türden kamusal varlığın metalaştırılıp özelleştirilmesiyle yaygınlaştırılan HES, RES, madencilik, turizm vb yatırımları işte bu devlet güvenceli yağmacı dü-zen içinde gerçekleştirilmektedir. Yaylaların da turizme açılması, bu amaçla gündeme getirilen "Yeşil Yol" (!), bu düzenin ürünleridir.	Media	Yaşam Alanıma Dokunma - Yeşil Yola Dur De- Sempozyumu page.10 (Accessed 21.03.2022)

APPENDIX B: CATEGORIZATION OF THE ARGUMENTS ACCORDING TO ENVIRONMENTAL JUSTICE PRINCIPLES

ID	EJ Dimension	Stakeholders	Argument Group
1	Ecological Distribution	Opposition Political Party (OPP)	Impacts on biodiversity and ecosystems
1	Economic Distribution	Opposition Political Party (OPP)	Impacts on local economy
1	Recognition	Opposition Political Party (OPP)	Appropriateness of the existing legal framework
2	Recognition	Local Residents	Respect for rights
2	Recognition	Local Residents	Appropriateness of the existing legal framework
3	Economic Distribution	National Government	Impacts on local economy
4	Recognition	Local Residents	Respect for rights
5	Recognition	Local Residents	Respect for rights
6	Recognition	Experts	Appropriateness of the existing legal framework
7	Economic Distribution	Media	Impacts on local economy
8	Recognition	Media	Appropriateness of the existing legal framework
9	Economic Distribution	National Government	Impacts on local economy
10	Recognition	National Government	Power inequality in decision making
11	Recognition	National Government	Power inequality in decision making
12	Economic Distribution	National Government	Impacts on local economy
13	Economic Distribution	National Government	Impacts on local economy
14	Economic Distribution	National Government	Impacts on local economy
15	Economic Distribution	National Government	Impacts on local economy
16	Economic Distribution	National Government	Impacts on local economy
17	Economic Distribution	National Government	Impacts on local economy
18	Economic Distribution	Tourism Business	Impacts on local economy
19	Ecological Distribution	National Government	Land use impacts
20	Ecological Distribution	Professional Chamber	Impacts on biodiversity and ecosystems
21	Ecological Distribution	Professional Chamber	Impacts on biodiversity and ecosystems
21	Recognition	Professional Chamber	Respect for rights
22	Ecological Distribution	Professional Chamber	Impacts on biodiversity and ecosystems
23	Ecological Distribution	Professional Chamber	Impacts on biodiversity and ecosystems
23	Ecological Distribution	Professional Chamber	Land use impacts
24	Ecological Distribution	Professional Chamber	Impacts on biodiversity and ecosystems
24	Ecological Distribution	Professional Chamber	Risk and hazards
25	Ecological Distribution	Professional Chamber	Impacts on biodiversity and ecosystems
25	Economic Distribution	Professional Chamber	Impacts on local economy
26	Participation	Tourism Business	Local participation in decision making
27	Recognition	Tourism Business	Respect for rights
27	Participation	Tourism Business	Local participation in decision making

ID	EJ Dimension	Stakeholders	Argument Group
28	Participation	National Government	Power inequality in decision making
29	Recognition	Local Residents	Respect for rights
30	Economic Distribution	Local Residents	Impacts on local economy
31	Ecological Distribution	Local Residents	Impacts on biodiversity and ecosystems
31	Ecological Distribution	Local Residents	Land use impacts
31	Recognition	Local Residents	Respect for rights
32	Recognition	Local Residents	Respect for rights
33	Economic Distribution	Local Residents	Impacts on local economy
34	Economic Distribution	Local Government	Impacts on national economy
34	Ecological Distribution	Local Government	Accessibility
35	Economic Distribution	Local Residents	Impacts on national economy
36	Recognition Recognition	Local Residents	Respect for rights
37	Recognition	Tourism Business	Respect for rights
38	Ecological Distribution	Experts	Impacts on biodiversity and
38	Ecological Distribution	Experts	ecosystems Risk and hazards
38	Recognition	Experts	Appropriateness of the existing legal
		-	framework
39	Recognition	Experts	Appropriateness of the existing legal framework
39	Ecological Distribution	Experts	Risk and hazards
39	Recognition	Experts	Respect for rights
40	Ecological Distribution	Professional Chamber	Land use impacts
41	Ecological Distribution	Professional Chamber	Impacts on biodiversity and ecosystems
42	Recognition	Professional Chamber	Respect for rights
43	Economic Distribution	National Government	Impacts on local economy
44	Economic Distribution	National Government	Impacts on local economy
45	Recognition	National Government	Respect for Rights
46	Economic Distribution	National Government	Impacts on local economy
47	Economic Distribution	National Government	Impacts on local economy
48	Economic Distribution	National Government	Impacts on local economy
48	Ecological Distribution	National Government	Accessibility
49	Recognition	Professional Chamber	Respect for rights
49	Recognition	Professional Chamber	Implementation of the existing legal framework
50	Economic Distribution	Media	Impacts on local economy
51	Recognition	Civil Society	Respect for rights
51	Ecological Distribution	Civil Society	Impacts on biodiversity and ecosystems
52	Ecological Distribution	Civil Society	Impacts on biodiversity and ecosystems
53	Recognition	Experts	Appropriateness of the existing legal framework
54	Ecological Distribution	Experts	Impacts on biodiversity and ecosystems
55	Participation	Experts	Power inequality in decision making
56	Ecological Distribution	Experts	Impacts on biodiversity and
57	Recognition	Media	ecosystems Pagnet for rights
58	•		Respect for rights
38	Ecological Distribution	Civil Society	Impacts on biodiversity and ecosystems

ID	EJ Dimension	Stakeholders	Argument Group	
59	Economic Distribution	National Government	Impacts on local economy	
60	Economic Distribution	National Government	Impacts on local economy	
61	Ecological Distribution	Opposition Political Party (OPP)	Land use impacts	
61	Recognition	Opposition Political Party (OPP)	Respect for rights	
62	Recognition	National Government	Respect for rights	
63	Ecological Distribution	Civil Society	Impacts on biodiversity and ecosystems	
63	Recognition	Civil Society	Appropriateness of the existing legal framework	
63	Recognition	Civil Society	Respect for rights	
64	Recognition	Civil Society	Implementation of the existing legal framework	
64	Ecological Distribution	Civil Society	Impacts on biodiversity and ecosystems	
65	Participation	Tourism Business	Power inequality in decision making	
65	Ecological Distribution	Tourism Business	Impacts on biodiversity and ecosystems	
66	Ecological Distribution	Tourism Business	Impacts on biodiversity and ecosystems	
67	Ecological Distribution	Civil Society	Impacts on biodiversity and ecosystems	
67	Economic Distribution	Civil Society	Impacts on local economy	
68	Recognition	Civil Society	Appropriateness of the existing legal framework	
69	Recognition	Civil Society	Respect for rights	
70	Economic Distribution	National Government	Impacts on local economy	
70	Economic Distribution	National Government	Impacts on national economy	
71	Economic Distribution	National Government	Impacts on local economy	
72	Economic Distribution	National Government	Employment	
73	Ecological Distribution	Civil Society	Impacts on biodiversity and ecosystems	
73	Ecological Distribution	Civil Society	Land use impacts	
73	Recognition	Civil Society	Respect for rights	
74	Economic Distribution	Civil Society	Impacts on local economy	
75	Economic Distribution	Professional Chamber	Impacts on local economy	
75	Ecological Distribution	Professional Chamber	Impacts on biodiversity and ecosystems	
76	Ecological Distribution	Tourism Business	Impacts on biodiversity and ecosystems	
76	Recognition	Tourism Business	Respect for rights	
77 78	Economic Distribution Ecological Distribution	Tourism Business Experts	Impacts on local economy Impacts on biodiversity and	
5 0	E 1 1 1 Di cii		ecosystems	
78	Ecological Distribution	Experts	Risk and hazards	
78	Recognition	Experts	Implementation of the existing legal framework	
79	Ecological Distribution	Civil Society	Impacts on biodiversity and ecosystems	
79	Ecological Distribution	Civil Society	Land use impacts	
80	Ecological Distribution	Civil Society	Impacts on biodiversity and ecosystems	
81	Economic Distribution	National Government	Impacts on local economy	
81	Ecological Distribution	National Government	Land use impacts	
82	Ecological Distribution	Tourism Business	Accessibility	

ID	EJ Dimension	Stakeholders	Argument Group
83	Recognition	National Government	Respect for rights
84	Recognition	Opposition Political Party (OPP)	Implementation of the existing legal framework
85	Ecological Distribution	Civil Society	Impacts on biodiversity and ecosystems
85	Recognition	Civil Society	Implementation of the existing legal framework
86	Economic Distribution	Experts	Impacts on local economy
86	Ecological Distribution	Experts	Land use impacts
87	Economic Distribution	National Government	Impacts on local economy
88	Economic Distribution	National Government	Impacts on local economy
89	Economic Distribution	National Government	Impacts on local economy
90	Recognition	Opposition Political Party (OPP)	Implementation of the existing legal framework
91	Recognition	National Government	Respect for rights
92	Recognition	Opposition Political Party (OPP)	Implementation of the existing legal framework
93	Recognition	National Government	Respect for rights
94	Ecological Distribution	Local Government	Impacts on biodiversity and ecosystems
95	Ecological Distribution	National Government	Impacts on biodiversity and ecosystems
96	Economic Distribution	National Government	Impacts on local economy
97	Economic Distribution	National Government	Impacts on local economy
98	Economic Distribution	National Government	Impacts on local economy
99	Economic Distribution	National Government	Impacts on local economy
100	Ecological Distribution	Local Government	Accessibility
101	Economic Distribution	Professional Chamber	Impacts on local economy
102	Economic Distribution	National Government	Impacts on local economy
102	Ecological Distribution	National Government	Accessibility
103	Economic Distribution	National Government	Impacts on local economy
104	Ecological Distribution	Professional Chamber	Land use impacts
104	Recognition	Professional Chamber	Implementation of the existing legal framework
104	Recognition	Professional Chamber	Respect for rights
105	Recognition	Opposition Political Party (OPP)	Implementation of the existing legal framework
105	Ecological Distribution	Opposition Political Party (OPP)	Land use impacts
105	Ecological Distribution	Opposition Political Party (OPP)	Impacts on biodiversity and ecosystems
106	Ecological Distribution	National Government	Land use impacts
107	Ecological Distribution	Local Government	Impacts on biodiversity and ecosystems
107	Ecological Distribution	Local Government	Land use impacts
107	Recognition	Local Government	Respect for rights
108	Recognition	Local Government	Respect for rights
109	Recognition	Local Government	Respect for rights
109	Participation	Local Government	Local participation in decision making
110	Ecological Distribution	Local Government	Impacts on biodiversity and ecosystems
111	Ecological Distribution	Local Government	Impacts on biodiversity and ecosystems

ID	EJ Dimension	Stakeholders	Argument Group
111	Recognition	Local Government	Implementation of the existing legal framework
112	Economic Distribution	Civil Society	Impacts on local economy
112	Recognition	Civil Society	Respect for rights
113	Recognition	Opposition Political Party (OPP)	Respect for rights
114	Ecological Distribution	Local Government	Impacts on biodiversity and ecosystems
114	Recognition	Local Government	Respect for rights
115	Ecological Distribution	Local Government	Impacts on biodiversity and ecosystems
116	Ecological Distribution	Opposition Political Party (OPP)	Impacts on biodiversity and ecosystems
116	Recognition	Opposition Political Party (OPP)	Implementation of the existing legal framework
116	Ecological Distribution	Opposition Political Party (OPP)	Land use impacts
117	Recognition	Local Residents	Respect for rights
118	Ecological Distribution	Civil Society	Impacts on biodiversity and ecosystems
119	Economic Distribution	Opposition Political Party (OPP)	Impacts on local economy
120	Ecological Distribution	Local Residents	Accessibility
121	Economic Distribution	National Government	Impacts on local economy
121	Ecological Distribution	National Government	Impacts on biodiversity and ecosystems
122	Ecological Distribution	Civil Society	Impacts on biodiversity and ecosystems
122	Ecological Distribution	Civil Society	Risk and hazards
122	Ecological Distribution	Civil Society	Land use impacts
123	Ecological Distribution	Local Government	Impacts on biodiversity and ecosystems
124	Ecological Distribution	Civil Society	Impacts on biodiversity and ecosystems
124	Ecological Distribution	Civil Society	Land use impacts
124	Recognition	Civil Society	Implementation of the existing legal framework
125	Recognition	Opposition Political Party (OPP)	Implementation of the existing legal framework
125	Economic Distribution	Opposition Political Party (OPP)	Impacts on local economy
125	Ecological Distribution	Opposition Political Party (OPP)	Impacts on biodiversity and ecosystems
126	Economic Distribution	Civil Society	Impacts on local economy
126	Recognition	Civil Society	Respect for rights
127	Ecological Distribution	Opposition Political Party (OPP)	Impacts on biodiversity and ecosystems
127	Recognition	Opposition Political Party (OPP)	Implementation of the existing legal framework
128	Ecological Distribution	Opposition Political Party (OPP)	Impacts on biodiversity and ecosystems
129	Ecological Distribution	Experts	Risk and hazards
129	Ecological Distribution	Experts	Impacts on biodiversity and ecosystems
130	Ecological Distribution	Civil Society	Impacts on biodiversity and ecosystems
131	Ecological Distribution	Opposition Political Party (OPP)	Impacts on biodiversity and ecosystems
131	Recognition	Opposition Political Party (OPP)	Respect for rights

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ID	EJ Dimension	Stakeholders	Argument Group
131	Recognition	Opposition Political Party (OPP)	Implementation of the existing legal framework
132	Economic Distribution	Local Government	Impacts on local economy
132	Ecological Distribution	Local Government	Impacts on biodiversity and ecosystems
133	Economic Distribution	National Government	Impacts on local economy
133	Economic Distribution	National Government	Impacts on national economy
133	Ecological Distribution	National Government	Accessibility
134	Recognition	Civil Society	Appropriateness of the existing legal framework
135	Economic Distribution	National Government	Impacts on local economy
135	Ecological Distribution	National Government	Accessibility
136	Recognition	Civil Society	Appropriateness of the existing legal framework
137	Economic Distribution	National Government	Impacts on local economy
137	Economic Distribution	National Government	Impacts on national economy
138	Recognition	Media	Respect for rights
139	Ecological Distribution	Local Residents	Impacts on biodiversity and ecosystems
139	Recognition	Local Residents	Respect for rights
140	Ecological Distribution	Media	Impacts on biodiversity and ecosystems
141	Ecological Distribution	Media	Impacts on biodiversity and ecosystems
142	Economic Distribution	Media-	Impacts on national economy

APPENDIX C: IN-DEPTH INTERVIEWS

Number	Description	Interview Date	Main Keywords
Interviewee 1	Local Resident	25.03.2022	Insufficient infrastructure, unplanned and excessive tourism, devastating impacts on environment
Interviewee 2	Local Resident	21.03.2022	Top-down manner, unlawfulness, non-transparency, unplanned development of tourism
Interviewee 3	Local Resident	19.03.2022	Environmental destruction, the role of civil society organizations,
Interviewee 4	Expert	25.03.2022	Legal basis of the project, environmental and sociocultural destruction
Interviewee 5	NGO Representative	03.12.2021	Mining, environmental destruction, unfair distribution of economic benefits
Interviewee 6	Expert	06.12.2022	Lack of participatory process, non-transparency
Interviewee 7	Expert	14.03.2022	Mining, the ineffective role of the locals in tourism development, environmental destruction, need of roads and transportation