

Ankara Etlik IHC-PPP Project

Environmental and Social Action Plan (ESAP)

October 2014

Astaldi & Türkerler (for Senior Funders)

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1 Environmental and Social Action Plan

1.1 Introduction

This document presents an Environmental and Social Action Plan (ESAP) which takes into account the gaps identified during the environmental and social due diligence of the construction and operation of the Elik Integrated Health Care Campus (Elik IHC-PPP).

Based on the gap analysis work undertaken as part of the due diligence, the table below presents an action plan for the pre-investment, construction and operational stages of the project to address the recommended actions and facilitate compliance. This includes identification of the parties responsible for undertaking the following:

- Specific actions required to achieve compliance with the Lender Environmental and Social Standards Equator Principles, relevant EBRD Performance Requirements and IFC Performance Standards and IFC EHS Guidelines, EU Law;
- Actions to mitigate potentially significant environmental and/or social risks, impacts and issues associated with the existing operations and facilities;
- Measures to avoid or mitigate any potential adverse environmental and social impacts, risks and issues pre-investment, associated with the proposed construction and operation stages;
- Measures providing environmental and social benefits and improving environmental quality if possible;
- Establishing an Environmental & Social Management System throughout the project life cycle with clear set responsibilities and reporting lines and resources underpinned with an Organisational Chart;
- Establishing an environmental and social monitoring and management plan for construction and operation;
- Establishing a future information and engagement programme to inform the public on the progress made on the environmental and social aspects of the project (including a grievance mechanism); and
- Pollution control and containment measures to deal with material pollution incidents.

Regular Lenders Supervisor report and the client's annual environmental and social report must address the implementation status of the ESAP at each project stage. If any shortcomings in ESIA implementation are identified, the remediation actions shall be proposed by the Lenders Supervisor and the Lenders.

Lenders' or Lenders Supervisor's monitoring visits will be carried out at least biannually to review the implementation status of the ESAP as deemed necessary.

The plans detailed in the construction and operational stages ESAP are subject to further discussion and agreement with the Ministry of Health of Turkey.

ESIA shall be specifically reviewed for potential modifications if needed during the project implementation. Any subsequent changes are subject to Lenders' agreement.

1.2 Pre-Investment Phase

Number	Issue/Action	Legal Framework EBRD PR	Deliverable / completion Indicator	Deadline	Implementation Responsibility
PR 1 – Environmental and Social Appraisal and Management					
1.1	Developing Project Specific Environmental and Social Management System and EHS Training Programme	EBRD PR1 & PR2 IFC PS1 & PS2 IFC EHS Guidelines	<p>Project specific environmental and social management system (ESMS) will be established (The ESMS for the operational stage also need to be developed early on with the consultation with the Ministry of Health (MoH) as well as other relevant entities). As part of it, the ESMP will include the following site specific procedures/plans:</p> <ul style="list-style-type: none"> • Contractors monitoring and management; • Hazardous material storage; • Air quality management plan; • Noise management plan; • Spill response plan; • Construction waste management plan; • Archaeological chance find procedure; and • Traffic management plan. <p>Organizational chart to be updated with Environmental,</p>	<p>Prior to financial close for construction phase.</p> <p>Implement ESMS/EMSP throughout construction and operation phases.</p>	SPV/EPC Contractor

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Number	Issue/Action	Legal Framework EBRD PR	Deliverable / completion Indicator	Deadline	Implementation Responsibility
			Health, and Safety (EHS) chief name, with defined roles and responsibilities. Training programme and records showing that the employees are adequately trained so they have the knowledge and skills to perform their work effectively.		
1.2	Contractor Compliance – include clauses in contracts requiring compliance with Project HR Policy, ESMP, ESAP, EHS and other Plans linked to ESMP	EBRD PR1 & PR2 IFC PS1 & PS2	Review of the updated contract requirements by the LTA to ensure that it contains appropriate clauses that require the contractors and sub-contractors to comply with the EHS requirements to manage the environmental and social risk and adhere to mitigation measures and actions identified and set out in the ESMP and ESIA. EHS Plan (both worker and community health and safety to be covered) to be prepared in line with ESMP by SPV and EPC contractor.	Prior to financial close	SPV/EPC Contractor
1.3	Develop and implement Worker Code of Conduct to manage workers' behaviour on site, in camp and in communities.	EBRDPR1 IFC PS1	Worker Code of Conduct. Evidence of how Code of Conduct distributed to workers. Workers report that they know about Code of Conduct in interviews.	Prior to financial close	SPV

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Number	Issue/Action	Legal Framework EBRD PR	Deliverable / completion Indicator	Deadline	Implementation Responsibility
1.4	Concrete batching plant/Tri-generation Plan –they require a Turkish EIA so impacts needs due consideration/ Action: Prepare the document for the Turkish authority and submit them to the Lenders	EBRDPR1 IFC PS1 Turkish Law	Document to be provided to Lenders	Prior to financial close	SPV
PR 2 – Labour and Working Condition					
2.1	Develop HR Policy for EPC/O&M contractor in line with EBRDPR2 and IFC PS2 for both construction and operational phase and ensure all workers are aware of its content. State policy on equal opportunity in HR Policy in line with EBRDPR2/IFC PS2. State commitment allowing workers to join trade union in HR Policy covering the whole project as well as a commitment to engage with representatives of unions when necessary.	EBRD PR2 IFC PS2	HR Policy document. Inclusion of summary of HR Policy in induction training given to all staff. HR Policy displayed on selected notice boards around site.	Prior to financial close	EPC and O&M contractor
2.2	Develop worker contracts for the project which cover all the requirements of EBRD PR2/IFC PS2.	EBRDPR2 IFC PS2	Template worker contracts available for review.	Develop template prior to financial close.	EPC and O&M contractor
2.3	Produce a Workers' Accommodation Plan detailing how provisions will be made for compliance with 'Workers' accommodation: processes and standards, a guidance note by IFC and the EBRD' (2009).	EBRDPR2 IFC PS2 EBRD/IFC Guidelines for Temporary Accommodation	Workers' Accommodation Plan.	Prior to financial close.	EPC contractor
2.4	Develop a worker grievance mechanism in line with EBRD PR2/IFC PS2. Commit to resolving grievances within specified timeframes. Commit to taking action to prevent recurrence of grievances where appropriate.	EBRD PR2 IFC PS2	Documented worker grievance mechanism.	Prior to financial close	EPC contractor
2.5	Appoint Occupational Health & Safety Manager for construction with clearly defined responsibilities for the construction in the Sponsor's company	EBRD PR2 IFC PS2	Draft Policy for review	Prior to commencement of the construction and operation/maintenance	EPC and O &M

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Number	Issue/Action	Legal Framework EBRD PR	Deliverable / completion Indicator	Deadline	Implementation Responsibility
	<p>Develop Occupational Health & Safety Policy for (i) construction and (ii) operation of the hospital including Emergency Response Measures</p> <p>Set up a centralised Reporting System on any OHS related accidents in the Sponsor's company</p>	IFC's Environmental, Health and Safety Guideline for Construction and Decommissioning.			
2.6	Prepare and implement a construction phase site health and safety plan which informed all workers of the rules and specific measures to be implemented during construction work. The plan is to be communicate to all contractors and updated as necessary	EU Directive 92/57/EEC	Copy of the construction phase site health and safety plan provided to Lenders at the beginning of the construction phase	Prior to construction	EPC Contractor
2.7	Prepare a health and safety file which should contain project health and safety information which needs to be taken into during the future maintenance, operation and demolition of the buildings.	EU Directive 92/57/EEC	<p>Copy of the handover certificate from the EPC to the Project Co.</p> <p>Initiate discussion with the MoH as how to co-ordinate with MoH for integrated health and safety policies and procedures for the operational stage.</p>	On completion of construction work	SPV
2.8	Ensure all working at heights will be sufficiently planned with physical measures in place to avoid, prevent and mitigate any falls	EU Directive 92/57/EEC	Copy of the construction phase site health and safety plan with clear requirements detailed within for working at heights during construction work.	Throughout construction work	EPC Contractor
PR 3 – Pollution Prevention and Abatement					
3.1	Hazardous Material Storage to be in compliance with IFC Guidance/ Project Company to update procedures for the storage of hazardous materials during the	EBRD PR3 IFC PS3 EBRD PR4	Updated procedures for storage and use of hazardous materials.	Develop template prior to financial close	SPV/EPC

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Number	Issue/Action	Legal Framework EBRD PR	Deliverable / completion Indicator	Deadline	Implementation Responsibility
	<p>construction and operational phases of the project to ensure that hazardous materials will be stored in line with IFC Guidance. In addition a register of hazardous materials stored on site should be kept by Project Co. LTA to review and approve procedures for hazardous material storage.</p> <p>Project Co will seek to avoid, reduce or eliminate the use of hazardous substances and materials, and will consider the use of less hazardous substitutes for such substances and materials to protect human health and environment from their potential harmful impacts.</p>	Good Practice IFC EHS Guidelines			
3.2	<p>Compliance with national and international standards/</p> <p>Project Company will ensure that the environmental requirements of the most stringent standards (National, EU Directives, IFC requirements) will be incorporated into their systems and will avoid the release of pollutants or, when avoidance is not feasible, minimise or control their release.</p>	EBRD PR3 IFC PS3 EBRD PR4 Good Practice Best Available Technique IFC EHS Guidelines	Updated ESMS/ESMP and monitoring records of compliance with ESMS/ESMP throughout construction and operation.	Throughout the project	SPV/EPC
3.3	<p>Air emissions/</p> <p>Trigeneration plant and boilers shall be designed to comply with the relevant national regulations and EU Directives</p>	EU Directives Turkish law	Documentation to be provided to Lenders	Prior to financial close.	SPV
PR 4 – Community Health, Safety and Security					
4.1	Develop Emergency Preparedness and Response Plan (EPRP) for construction and operational phase in collaboration with relevant local authorities.	EBRD PR 4 IFC PS4	EPRP (for operational period, the plan will include specific measures for forensic hospital)	Prior to financial close.	SPV

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Number	Issue/Action	Legal Framework EBRD PR	Deliverable / completion Indicator	Deadline	Implementation Responsibility
4.2	<p>Provide security policy and plan detailing company's position and measures to address use of force, training, equipping and monitoring security guards as well as investigating reports of unlawful behaviour and preventing recurrence for the project for both construction and operational phases.</p> <p>Special consideration to be given in the security policy to collaboration with MoH and MoJ in its plans for security at the forensic hospital and other secure parts of the hospital, to the needs of patients, members of the community and staff.</p>	EBRD PR 4 IFC PS4	<p>Security policy and plan.</p> <p>Initiate discussion with the Ministry of Justice and MoH as to how address security issues.</p>	Prior to financial close.	EPC and O&M contractor
4.3	<p>Implement a third party life and fire safety audit <u>The Sponsor must hire an L & FS expert; acceptable to the EBRD</u> is to be appointed to oversee the preparation and implementation of an L & FS Master Plan.</p> <p>The plan will ensure that the project must be designed, constructed and operated in compliance with local building code, local fire department regulations, and local legal/insurance requirement and in accordance with internationally recognized L & FS code. The plan will follow IFC EHS Guidelines (3.3 L &FS). The plan may entail a Corrective Action Plan if remediation measures are required and the CAP must be agreed and implemented by the Sponsor within a reasonable time frame. The same L & FS experts who prepared the plan will also undertake a review at the time of L & FS systems testing and commissioning and certify that construction of life and fire safety system has been carried out in accordance with the accepted design and master plan.</p> <p>The Sponsor must have regular maintenance and operational check of life and fire safety provisions. All provisions for disability access are in place in compliance with international standards</p>	EBRD PR4 IFC NAFS	A third party audit report	Prior to First Disbursement	SPV

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Number	Issue/Action	Legal Framework EBRD PR	Deliverable / completion Indicator	Deadline	Implementation Responsibility
PR 8–Cultural Heritage					
8.1	Chance find procedure	IFC PS8 National Regulation on Protection of Cultural and Natural Properties	Chance find procedure to be presented within ESMP.	Prior to financial close	SPV/EPC
PR 10/PS1 –Information Disclosure and Stakeholder Engagement					
10.1	SEP to be updated when the Project moves into the construction phase.	EBRD PR10 IFC PS1	SEP update	Prior to construction	SPV
10.2	Documentation of all information disclosure to be kept on record	EBRD PR 10 Equator Principle 5 IFC PS1	Document Log	On going Ensure that a specific manager is assigned for this task in the SPV. Provided to Lenders per request at any time	2U1K, RPC, SPV and O & M contractor
10.3	Implementation of Project Performance Grievance Mechanism	EBRD PR10 IFC PS1	Grievance Log Records of correspondence	Prior to financial close. Ensure that a specific manager is assigned for this task in SPV	SPV
10.4	ESIA, SEP and ESMP to be disclosed and remain in the public domain for the lifetime of the Project.	EBRDPR10	Evidence of disclosure and availability (web page etc)	May 2013	SPV

1.3 Construction Phase

Number	Issue/Action	Legal Framework	Deliverable / completion Indicator	Deadline	Implementation Responsibility
PR 1 – Environmental and Social Appraisal and Management					
1.1	Developing Project Specific Environmental and Social Management System and EHS Training Programme	EBRD PR1 & PR2 IFC PS1 & PS2 IFC EHS Guidelines	<p>Project specific environmental and social management system (ESMS) will be established. As part of it the ESMP will include the following site specific procedures/plans for construction::</p> <ul style="list-style-type: none"> • Contractors monitoring and management; • Emergency preparedness and response plan; • Hazardous material storage; • Air Quality management plan; • Noise management plan; • Spill response plan; • Construction waste management plan; • Archaeological chance find plan; and • Traffic management plan; and <p>Organizational chart to be updated with Environmental, Health, and Safety (EHS) chief name, with defined roles and responsibilities. Training programme and records showing that the employees are adequately trained so they have the knowledge and skills to perform their work effectively.</p>	Prior to construction phase Implement ESMS/EMSP throughout construction phase.	EPC Contractor
1.2	ESMS/ESMP Compliance/Internal reporting	EBRD PR1 IFC	Monthly Progress Reporting to the Lenders	Throughout the construction phase	EPC Contractor

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1.3	Contractor Compliance	EBRDPR1 & PR2 IFC PS1 & PS2	Review of the updated contract requirements by the LTA to ensure that contractors and sub-contractors comply with the EHS requirements to manage the environmental and social risk and adhere to mitigation measures and actions identified and set out in the ESMP and ESIA	Prior to construction phase	EPC Contractor
1.4	Permits and licenses	EBRDPR1 IFC PS1 Turkish Environmental Law	Proof of documentation for: Outstanding permits Construction Permit Environmental & Water Permits Municipality permits	Needed: Prior to construction Prior to operation Prior to operation	EPC Contractor
1.5	Construction Methods/ Development of Method Statements	EBRD PR1 EBRD PR8 IFC PS 1	Lenders Technical Adviser (LTA) to receive construction methods for each construction activity (note: Construction Method for Demolition works has been received). Development of method statements will act as key document to facilitate management and monitoring of construction stage environmental and social issues. Construction methods for each construction activity received by LTA, method statements in place in line with good practice to manage and monitor construction E&S issues	Prior to each construction activity submittal of Method Statements to LTA	EPC contractor
PR 2 – Labour and Working Condition					
2.1	Develop Health and Safety Plan for construction phase of the Project. i. Implement OHS plan based on risk analysis for the	EBRD PR2 IFC PS2	Health and Safety Plan In accordance the Monitoring Plan, Lender specialist visit the construction site at a minimum once a year	Commence upon the start of the earth work	OHS manager/ Project Manager of the Sponsor

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Number	Issue/Action	Legal Framework EBRD PR	Deliverable / completion Indicator	Deadline	Implementation Responsibility
	<p>construction using international benchmark such as IFC's <u>Environmental, Health and Safety Guideline for Construction and Decommissioning</u> as well as comply with Turkish OHS law and requirements</p> <p>ii. OHS manager with clearly defined responsibilities for the construction in the Sponsor's company</p> <p>iii. constant OHS supervision at site</p> <p>iv. Ensure that the construction workers are provided with OHS training and adequate Personal Protection Equipment Assign.</p> <p>v. Place OHS sigh clearly</p> <p>vi. Ensure fences, hand rails in place</p> <p>vi. Implement a centralised reporting system on any OHS related accidents in the Sponsor's company</p> <p>vii. Ensure medical first aid at the site and emergency transfer</p> <p>ix.. Report Material OHS incident promptly to Lenders.</p>	<p>EU OHS</p> <p>IFC EHS Guidelines</p> <p>IFC EHS Guidelines for health care facilities;</p> <p>Turkish law</p>	<p>Report promptly any material OHS issues to Lenders</p> <p>Provide information on OHS management in Lender Supervisor and Annual Report</p>		
2.2	<p>Worker Protection</p> <p>(i) Comply with national labour law</p> <p>(ii) Ensure individual and contract labour contract in line with PR2</p> <p>(iii) Ensure migrant and/or immigrant construction workers' human right to be fully respected</p> <p>(iv) If temporary</p>	<p>Turkish labour law</p> <p>EBRD PR2</p> <p>IFC PS2</p>	<p>Monitoring Plan, lender specialist visit the site</p> <p>Provide information on OHS management and how many grievances were received and from whom, how many were resolved and how in the Lender Supervisor and Annual Report</p>	<p>Prior to commencement of construction.</p>	EPC Contractor

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	accommodation is provide, it need to comply with <u>EBRD/IFC Guidelines for Temporary Accommodation</u>	EBRD PR			
2.3	Appointment of HR Manager for the Project for construction phase.	EBRD PR2 IFC PS2	HR Manager as a member of project staff and show on organisation chart.	Prior to commencement of construction.	EPC contractor
2.4	Based on the review and assessment (action 2.2 pre-investment phase) develop together with MoH a retrenchment plan as needed.	EBRD PR2 IFC PS2	As needed, develop retrenchment plan subject to Lenders' approval.	Prior to any collective dismissal.	SPV and MoH
2.5	O&M contractor to prioritise existing staff members at the six hospitals due for closure when recruiting for the operational phase. Develop recruitment policy and plan to this end.	Best practice	Recruitment policy and plan; and Staff lists for EIHC operation showing which companies/hospitals people were recruited from	3 months prior to recruitment phase for O&M contractor	O&M contractor
2.6	Payroll checks by EPC contractor against issues such as sub-contractor wage rates, payment of benefits and timely payments.	EBRD PR2 IFC PS2 Turkish law	Short quarterly reports available for review by external monitors. (More frequent if necessary).	At commencement of construction and maintain regularly throughout Project.	EPC contractor
2.7	Issue contracts to all workers covering all the requirements of EBRD PR2/IFC PS2.	EBRD PR2 IFC PS2	Worker contracts available for review. Workers state that they have contracts when interviewed.	Develop prior to commencement of construction; issue upon recruitment.	EPC contractor
2.8	Develop method statements for each work activity for construction. Maintain records of safety and induction training and the names of first aiders.	EBRD PR2 IFC PS2 EU OHS requirements; IFC General EHS	Method statements; Training records; List of first aiders and evidence that workers know who they are; Accident and incident logs;	Prior to commencement of construction.	EPC contractor

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Number	Issue/Action	Legal Framework EBRD PR	Deliverable / completion Indicator	Deadline	Implementation Responsibility
	<p>Make staff aware of whom first aiders are.</p> <p>Maintain accident and incident logs.</p> <p>EPC/O&M safety officers to carry out regular inspections of site safety and PPE use on site.</p> <p>Keep records of next of kin contact details in each worker's personnel file.</p> <p>Young people are not to be employed in hazardous work.</p>	Guidelines; IFC EHS Guidelines for health care facilities; Turkish law.	Safety inspection records; and Personnel files.		
2.9	<p>Require sub-contractors to adhere to EPC contractors' OHS policies and plans through contract clauses.</p> <p>Require sub-contractors to report accidents, incidents and safety non-compliances.</p> <p>Require sub-contractors to maintain records of their employee's next of kin contact details.</p>	EBRD PR2 IFC PS2	Contracts; Sub-contractor accidents, incidents and non-compliances kept on record; and Sub-contractor personnel files.	Prior to commencement of construction.	EPC contractor
2.10	<p>Ensure all workers are informed of the grievance mechanism and that it is easily accessible to them.</p> <p>Commit to resolving grievances within specified timeframes.</p> <p>Commit to taking action to prevent recurrence of grievances where appropriate.</p>	EBRDP R2 IFC PS2	Maintain records of grievances and how they are closed out; and Evidence of how workers are informed of grievance mechanism.	Prior to commencement of construction.	EPC contractor
2.11	Require sub-contractors to manage their workers in line with the HR Policy by including HR Policy in tender documentation	EBRD PR2 IFC PS2	Tender documents and contracts.	Prior to start of construction.	EPC contractor

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	and contractual agreements.				
2.12	<p>Include pass/fail factor for contractors based on their health and safety performance when reviewing bids.</p> <p>Carry out checks on sub-contractors to verify they are reputable and legitimate enterprises prior to entering into contracts and document this process.</p>	EBRD PR2 IFC PS2	Records showing process and results of sub-contractor reviews.	Prior to signing contracts with sub-contractors.	EPC contractor
2.13	<p>Carry out checks on major suppliers to inquire about life-threatening issues, the use of child and forced labour and take necessary steps to address in line with EBRD PR2 / IFC PS2.</p> <p>All contractors will sign an anti-corruption and responsible procurement policy.</p>	EBRD PR2 IFC PS2	<p>Records showing process and results of supplier reviews; and Inclusion of process to be undertaken into existing 'Supply Chain Management System' documentation for the Project.</p> <p>Signed statements from contractors</p>	Prior to procurement from major suppliers.	EPC contractor
2.14	Maintain database of employees and sub-contractor employees showing age of employees, social security number, identity card number, gender, ethnicity, nationality and home town.	EBRD PR2 IFC PS2	Database available for review by external monitors.	Commence immediately and maintain regularly throughout Project.	EPC contractor
PR 3 – Pollution Prevention and Abatement(
3.1	<p>Noise Monitoring/</p> <ul style="list-style-type: none"> - undertake monthly noise reporting (at sensitive receptor)during construction - if night time working proposed , then undertake specific noise 	EU Directive 2002/49EC EBRD PR3 Turkish Noise Control Regulation Good Practice	<p>Monthly reporting by Project Company showing compliance with the relevant IFC and EU Guidance.</p> <ul style="list-style-type: none"> - monthly noise monitoring reports - night-time noise assessment (if required) - Noise management plan in place 	Ongoing monthly reporting	EPC contractor

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Number	Issue/Action	Legal Framework EBRD PR	Deliverable / completion Indicator	Deadline	Implementation Responsibility
	assessment for sensitive receptors: and - Develop Noise Management plan as part of ESMP	IFC EHS Guidelines • IFC PS 3			
3.2	Water/Wastewater Monitoring/ Project Co to monitor and report monthly to the LTA showing compliance with the relevant IFC and EU Guidance.	EU Directive 91/271/EEC EBRD PR3 IFC PS3 Good Practice IFC EHS Guidelines Turkish Groundwater Law No. 167 Turkish Water Pollution Control Regulation	Monthly reporting by Project Co to the LTA showing compliance with the relevant IFC and EU Guidance • No wastewater discharges to the receiving environment • Compliance with IFC and EU Guidance • Implement measures to prevent / reduce / control impacts to groundwater and surface water as a result of spills of fuel, lubricants and other chemicals. • Store fuels and oils in bunded containers with 110% capacity. • Ensure drip-trays are in place where fuels or oils are stored or used. • Identify a designated bunded refuelling location • Provide training to drivers and equipment operators in proper fuel management.	Prior to start of construction/ and ongoing Monthly Reporting	EPC Contractor
3.3	Waste/ Construction Waste Management Plan to include: • Recyclable wastes will be collected separately in suitable containers and temporarily stored in the Waste Storage Area. • Recyclables will be disposed of to a licensed recycling facility. Disposal methods for the demolition will be defined.	EU Directive 2008/98EC EBRD PR3 IFC PS3 Good Practice IFC EHS Guidelines	Waste transfer certificates during construction phase, and breakdown of waste quantities recycled and re-used on site and assessment against waste recycling/reuse targets provided within the Construction Monthly Progress Report.	Prior to start of construction/ and ongoing Monthly Reporting (of Construction	EPC contractor

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3.4	<p>Air Quality/</p> <ul style="list-style-type: none"> • Truck speed will be limited to 20 km/hour. • Water spraying for unpaved roads will be undertaken • Trucks will be covered when transporting materials. • Wind barriers will be established (if needed) in case of windy seasonal conditions. • Water spraying system (if needed) will be established and continuously operated for crusher operations, especially during dry and windy conditions. • The drop height of potentially dust generating materials will be kept as low as possible and stockpiles sprayed • Regular inspection and maintenance of construction plant and equipment will be conducted. • Regular measurement of exhaust emissions will be performed. • Third party monitoring to be undertaken by accredited laboratory on a monthly basis in relation to PM₁₀, SO₂, NO₂ and CO 	<p>EBRD PR3 IFC PS3 National Industrial Source Air Pollution Control Regulation and Exhaust Gas Emission Control Regulation EU Directive 96/62EC</p>	<p>To limit dust generation and emissions based on Air Quality Management Plan</p> <p>Air Quality Monitoring to identify any changes to the baseline and verify modelling results</p>	Ongoing monthly reporting	EPC contractor
3.5	Hazardous Waste/ Hazardous waste will be collected separately at closed containers	<p>EU Directive 2008/98EC EBRD PR3</p>	Hazardous Waste Management Plan which correlates with the requirements for the ESMP and plan to be done within the timeframe.	Prior to start of construction.	EPC contractor

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	<p>(where available) suitable for the chemical components of the waste.</p> <ul style="list-style-type: none"> These waste stored at separate places in the Hazardous Waste Temporary Storage Area to be established according to the current legislation. Hazardous wastes will be stored in this area for at most six months. Hazardous wastes will be sent to the licensed hazardous waste incineration facilities or recycling facilities via licensed transportation companies. 	Best Practice IFC EHS Guidelines			
3.6	<p>Design</p> <p>(i) Radiology treatment facilities design meets international standards</p> <p>(ii) Waste water pipes and treatment from the radiology treatment facilities meet international standards</p> <p>(iii) Waste water pipes and treatment from laboratories meet international standard</p> <p>(iv) Waste water pre-treatment and discharge to the municipal sewage networks meet international stands</p> <p>(v) Diesel tanks design meet EU oil storage</p>	Best Practice Turkish Medical Waste Law	Report in the Lender Supervisor Annual Report	Once it becomes operational	Technical Manager

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Number	Issue/Action	Legal Framework EBRD PR	Deliverable / completion Indicator	Deadline	Implementation Responsibility
	directives				
3.7	Design for Heliport Heliport Design meets noise and dust national standards and international benchmarks	Civil Aviation Authority Best Practise	LTA to receive document related to heliport design and emissions	Prior to start of construction.	Technical Manager
PR 4 – Community Health, Safety and Security					
4.1	<p>Implement community health and safety measures in construction and operational phase (for example, Emergency Preparedness and Response Plan, Traffic Safety Plans, Awareness raising campaign regarding risk related to the movement of heavy vehicles in the area.).</p> <p>Implement Traffic Safety Measure for the residents</p> <p>i) Develop an adequate construction traffic management plan and implement control measures to prevent injury to third parties (Residents).</p> <p>(ii) Introduce a dedicated access point for all construction traffic which is separate from resident's access. The access should be clearly signed and information on</p>	<p>EBRD PR4 IFC PR4 EU regulations International standards including WHO limits, IFC Environmental, Health and Safety General Guidelines and IFC EHS Guidelines for health care facilities; Turkish law</p>	Measures to be identified in ESMP and verified through external monitoring.	Implementation due prior to commencement of construction and operational phases.	EPC contractor

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	<p>its location should be communicated to all workers, contractors and suppliers.</p> <p>(iii) Mitigate noise, dust and vibration in accordance with applicable standards.</p> <p>(iv) Ensure to minimize and mitigate any disturbance associated with utility services for the neighbouring communities during the demolition and construction of utilities at the Project Site.</p>				
4.2	<p>Disclose EPRP to communities in line with EBRD PR4/IFC PS4.</p> <p>Update communities and local authorities if plans change.</p> <p>Carry out regular drills/exercises of emergency measures.</p>	EBRDPR 4 IFC PS4	<p>EPRP</p> <p>Evidence of disclosure and updates.</p> <p>Records of drills.</p>	<p>Prior to commencement of construction</p> <p>On-going</p>	EPC contractor
4.3	Document discussion of any identified impacts, risks and mitigations with communities during project preparation and at least annually thereafter.	EBRD PR4 IFC PS4	Records of meetings to be kept on file.	On-going.	EPC Contractor
4.4	Co-operate/co-ordinate with the MoH about the closure of the existing 6 hospitals in Ankara and the opening of the hospital complex and update/inform the closure and opening schedule for the patients and public	EBRD PR4 IFC PS4	Provide information to the patients and public	<p>As soon as possible, during the construction and prior to the commencement of the hospital complex</p>	SPV and the MoH

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PR 8– Cultural Heritage					
8.1	Implement chance find procedures	IFC PS8 Turkish national regulation on Protection of Cultural and Natural Properties	Chance find procedure to be present in ESMP	Throughout the construction phase On going	SPV
PR 10/PS1 –Information Disclosure and Stakeholder Engagement					
10.1	SEP to be updated when the Project changes phase or if there are other significant changes to the Project. The SEP update to include the public information distribution regarding timing and process issues associated with the future closure of the six existing hospitals in Ankara.	EBRD PR10 IFC PS1	SEP	Update due prior to change in phase.	SPV
10.2	Implementation of Project Performance Grievance Mechanism. Put grievance mechanism contact details on publications such as leaflets and signage and make available during public and other meetings (such as on a presentation slide, or on a grievance form).	EBRD PR10 IFC PS1	Grievance Log Records of correspondence	Prior to commencement of construction	SPV
10.3	Documentation of all consultation and information disclosure to be kept on record.	EBRD PR10 Equator Principle 5 IFC PS1	Consultation activity log; and Minutes of meetings.	On-going.	SPV

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10.4	Annual reporting to the Lenders on implementation of ESMP and any new impacts and risks identified to affected communities.	EBRD PR10 IFC PS1	Evidence of disclosure and availability (web page etc) Reports available to external monitors	Annually	SPV

1.4 Hospital Operational Phase

PR 1 – Environmental and Social Appraisal and Management					
Number	Issue/Action	Legal Framework	Deliverable / completion Indicator	Deadline	Implementation Responsibility
1.1					
1.1	All relevant commissioning tests have been carried out successfully. Obtain all necessary approval for the commencement of the Hospital Update all necessary permits on time	EBRD PR1 IFC PS 1	Approval Documentation to be submitted for EBRD	Once the Hospital becomes operational	Project Manager of the Sponsor
1.2	Implement third party environmental and social audit in accordance with IFC Guide after the commencement of the hospital complex (given the size of the hospital complex, this will be an important exercise to ensure overall soundness of the hospital operation including EHS, infectious disease control and , patient right).	The third party environmental and social audit will be carried out in accordance with IFC EHS Guidelines for Health Care Facilities	The selection of the auditor and TOR are subject to the Lender's review An audit report to the Lenders' review	Every three years after the commencement of the hospital complex	The MoH and O & C Company

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Number	Issue/Action	Legal Framework	Deliverable / completion Indicator	Deadline	Implementation Responsibility
1.3	Contractor Compliance - – include clauses in contracts requiring compliance with Project HR Policy, ESMP, ESAP, EHS and other Plans linked to ESMP	EBRD PR1 & PR2 IFC PS1 & PS2	Review of the updated contract requirements by the LTA to ensure that it contains appropriate clauses that require the contractors and sub-contractors to comply with the EHS requirements to manage the environmental and social risk and adhere to mitigation measures and actions identified and set out in the ESMP and ESIA	Prior to operation	O&M contractor
1.4	Sustainable Procurement	EBRD PR1 & PR2 & PR6 IFC PS1 & PS2	Project Co to adopt procedures for sustainable procurements and include environmental and social requirements for the provision of future services at the airport.	Prior to operation	O&M contractor
1.5	Life and Fire Safety	EBRD PR2 , IFC PS 2 IFC EHS Guidelines international best practice EBRD PR4 IFC PS4	As a follow up to the construction phase Life and Fire Safety audit, O&M contractor to develop a life and fire safety master plan in accordance with IFC EHS Guidelines. This will require a suitably qualified professional to prepare the aforementioned plan and conduct a review as part of the project completion test at the time of life & fire safety systems testing and commissioning and certification	Prior to Operation	O&M contractor
1.6	Project Agreement Schedule 14 Service Requirements/ Project Co to agree on P1 and P2 services with the MoH	EBRD PR3 , IFC PS 3 IFC EHS Guidelines international best practice	These plans will subject to further discussions/agreement with MoH and to be provided to the LTA for review.	Prior to Operation	O&M contractor
PR 2 – Labour and Working Condition					
2.1	Appointment of HR Manager for the Project for operational phase.	EBRD PR2 IFC PS2	HR Manager as a member of project staff and show on organisation chart.	Prior to commencement of operation	O&M contractor
2.2	Payroll checks by O&M contractor against issues such as sub-contractor wage rates, payment of benefits and timely payments.	EBRD PR2 IFC PS2 Turkish law	Short quarterly reports available for review by external monitors. (More frequent if necessary).	At commencement of operation and maintain regularly throughout Project.	O&M contractor

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Number	Issue/Action	Legal Framework EBRD PR	Deliverable / completion Indicator	Deadline	Implementation Responsibility
2.3	Issue contracts to all workers covering all the requirements of EBRD PR2/IFC PS2.	EBRD PR2 IFC PS2	Worker contracts available for review. Workers state that they have contracts when interviewed.	Develop prior to commencement of construction; issue upon recruitment.	O&M contractor
2.4	Assign OHS Manager and Revise Occupational Health and Safety Plan for operational phase.	EBRD PR2 IFC PS2	Assign OHS Manager in the O & C Company with clear responsibilities and tasks Revised plan Report promptly any material OHS issues to Lenders	Prior to commencement of operation.	O&M contractor MoH
2.5	Two HR Coordination -Establish procedures to communicate and co-ordinate among the employees of the Sponsor and the medical professional under the Ministry of Health -Establish procedures to resolve any issues among the two HR management lines by the MoH and the Sponsor	EBRD PR2 IFC PS2	Procedure to be available for review of Lenders and Lender Supervisor	Prior to commencement of operation.	O&M contractor MoH
2.6	Develop method statements for each work activity for operation. Maintain records of safety and induction training and the names of first aiders. Make staff aware of whom first aiders are. Maintain accident and incident logs. O&M safety officers to carry out regular inspections of site safety and PPE use on site. Keep records of next of kin contact details in each worker's personnel file.	EBRD PR2 IFC PS2 EU OHS requirements; IFC General EHS Guidelines; IFC EHS Guidelines for health care facilities; Turkish law.	Method statements; Training records; List of first aiders and evidence that workers know who they are; Accident and incident logs; Safety inspection records; and Personnel files.	Start of operation.	O&M contractor MoH

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Number	Issue/Action	Legal Framework EBRD PR	Deliverable / completion Indicator	Deadline	Implementation Responsibility
2.7	<p>Require sub-contractors to adhere to O&M contractors' OHS policies and plans through contract clauses.</p> <p>Require sub-contractors to report accidents, incidents and safety non-compliances.</p> <p>Require sub-contractors to maintain records of their employee's next of kin contact details.</p>	EBRD PR2 IFC PS2	<p>Contracts;</p> <p>Sub-contractor accidents, incidents and non-compliances kept on record; and</p> <p>Sub-contractor personnel files.</p>	Start of operation.	O&M contractor
2.8	<p>Ensure all workers are informed of the grievance mechanism and that it is easily accessible to them.</p> <p>Commit to resolving grievances within specified timeframes.</p> <p>Commit to taking action to prevent recurrence of grievances where appropriate.</p>	EBRD PR2 IFC PS2	<p>Maintain records of grievances and how they are closed out; and</p> <p>Evidence of how workers are informed of grievance mechanism.</p>	Start of operation.	O&M contractor
2.9	Require sub-contractors to manage their workers in line with the HR Policy by including HR Policy in tender documentation and contractual agreements.	EBRD PR2 IFC PS2	Tender documents and contracts.	Prior to start of operation.	O&M contractor
2.10	<p>Include pass/fail factor for contractors based on their health and safety performance when reviewing bids.</p> <p>Carry out checks on sub-contractors to verify they are reputable and legitimate enterprises prior to entering into contracts and document this process.</p>	EBRD PR2 IFC PS2	Records showing process and results of sub-contractor reviews.	Prior to signing contracts with sub-contractors.	O&M contractor

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Number	Issue/Action	Legal Framework EBRD PR	Deliverable / completion Indicator	Deadline	Implementation Responsibility
2.11	<p>Carry out checks on major suppliers to inquire about life-threatening issues, the use of child and forced labour and take necessary steps to address in line with EBRD PR2 / IFC PS2.</p> <p>All contractors will sign an anti-corruption and responsible procurement policy.</p>	EBRD PR2 IFC PS2	<p>Records showing process and results of supplier reviews; and Inclusion of process to be undertaken into existing 'Supply Chain Management System' documentation for the Project.</p> <p>Signed statements from contractors.</p>	Prior to procurement from major suppliers.	O&M contractor
2.12	Maintain database of employees and sub-contractor employees showing age of employees, social security number, identity card number, gender, ethnicity, nationality and home town.	EBRD PR2 IFC PS2	Database available for review by external monitors.	Commence immediately and maintain regularly throughout Project.	O&M contractor
PR 3 – Pollution Prevention and Abatement					
3.1	Pollution Prevention/	EBRD PR1	Project Co to establish / update the operational environmental management system to the equivalent standard of ISO14001.	Within a year of operation	O&M contractor
	Procedures and ESMP to be updated to incorporate mitigation measures necessary to maintain compliance with the EBRD Environmental and Social Standards set out in the ESMP and ESIA and IFC EHS Guidelines in relation to	EBRD PR3	Project Co to assign Environmental Manager for the Operation with clear responsibilities		
		IFC PS1 and PS 3	Report promptly on any environmental material issues to Lenders		
		Best Practice			
	<ul style="list-style-type: none"> • Wastewater • Air quality • Noise • Waste • Medical and Radioactive waste • Hazardous waste, and 				

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Number	Issue/Action	Legal Framework EBRD PR	Deliverable / completion Indicator	Deadline	Implementation Responsibility
	GHG emissions.				
3.2	<p>Operation phase - Waste Management</p> <p>Ensure that there is a Waste Management Plan in compliance with local / national environment, health and safety requirements and the IFC's Environmental, Health and Safety Guideline for Health Care Facilities (April 30th, 2007).</p> <p>Ensure that all medical/hazardous waste separated at the point and handled/transferred/disposed in accordance with national law and IFC's Environmental, Health and Safety Guideline for Health Care Facilities (April 30th, 2007).</p>	<p>EBRD PR1 EBRD PR3 IFC PS1 and PS 3 Best Practice</p>	<p>Provide the waste documentation and information in the Annual Report to the Bank</p> <p>A third party environmental and social audit shall be carried out every three years to confirm it.</p>	Prior to operation	Environmental/ Technical Manager
3.3	<p>Operation phase - Wastewater Management</p> <p>Ensure that laboratory waste water is collected in a special holding tank which is then treated with chlorine before entering the municipal sewage system.</p>	<p>EBRD PR1 EBRD PR3 IFC PS1 and PS 3 Best Practice</p>	<p>Provide the documentation and information in the Annual Report</p> <p>A third party environmental and social audit shall be carried out every three years to confirm it.</p>	Prior to operation	Environmental/ Technical Manager

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Number	Issue/Action	Legal Framework EBRD PR	Deliverable / completion Indicator	Deadline	Implementation Responsibility
	<p>Ensure that the Chemo Therapy ward is equipped with the waste water piping running on a separate line from general hospital waste water.</p> <p>Ensure that areas utilising radioactive materials i.e. toilets and sinks have been re-plumbed and directed into dedicated collection tanks.</p>				
3.4	Radioactive substance management in accordance with national law and the IFC's Environmental, Health and Safety Guideline for Health Care Facilities (April 30th, 2007).	EBRD PR1 EBRD PR3 IFC PS1 and PS 3 Best Practice Turkish Law IAEA Safety Standards	Radioactive substance management plan to be provided	Prior to operation	Environmental/ Technical Manager
3.5	Pollution Prevention/ Project Co to develop a set of activity based procedures or operational method statements adopting international best practice for the operation of the hospital to demonstrate how they will manage the issues	EBRD PR 1 EBRD PR 3 EBRD PR 6 IFC PS 1& 3 & 6 Best Practice Requirement	<p>Procedures to be provided including, but not limited to:</p> <ul style="list-style-type: none"> • Hazardous materials storage • Waste management • Hazardous waste management • Medical and Radioactive waste management • Wastewater (additional need for stabilization) management • Emergency response • Traffic management 	Prior to operation	O&M contractor

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Number	Issue/Action	Legal Framework	Deliverable / completion Indicator	Deadline	Implementation Responsibility
			<ul style="list-style-type: none"> • Air quality management • Noise management 		
3.6	Hazardous Material Storage/ Project Co is to provide its hazardous materials register and methods	EBRD PR3 IFC PS3 EBRD PR4 Good Practice IFC EHS Guidelines	Project Co is to provide its hazardous materials register and methods of hazardous materials storage and pollution prevention measures in order to confirm compliance with national legislation and international best practice.	Prior to operation	O&M contractor
3.7	GHG emissions/ Project Co to monitor and report	EBRD PR3 IFC PS3	Project Co to monitor and report greenhouse gas emissions during the operation of the project	Within a year of operation and reported annually	O&M contractor
3.8	Trigeneration emissions/ Project Co to monitor and report	EBRD PR3 IFC PS3 IFC EHS General Guidelines	Trigeneration emission monitoring to be undertaken in line with IFC EHS Guidelines: Air Emissions & Ambient Air Quality. Monitoring is required on an annual basis	Annually	O&M contractor
3.9	Information regarding Wastewater Treatment Infrastructure and Medical Waste Incineration Plant / Sponsor to include information regarding these facilities into their wastewater and waste management plans	EBRD PR3 IFC PS3 IFC EHS General Guidelines	Wastewater Management Plan and Waste Management Plan to include this information	Prior to operation	O&M contractor
3.10	Record-keeping on environmental accidents and actions taken	PR3 IFCPS3	Log on environmental material issues and the way it is addressed.	Immediately after the commencement of the hospital	O & M company Environmental/Tehcnical Manager the MoH

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PR 4 – Community Health, Safety and Security					
4.1	<p>Implement updated community health and safety measures in operational phase (e.g. EPRP, Child targeted traffic safety campaigns)</p> <p>Occupational health and safety management system to be updated for all staff with adequate training on exposure to vector-borne diseases.</p> <p>Update communities and local authorities if these plans change.</p> <p>Ensure emergency contact details are regularly updated.</p>	<p>EBRD PR4 IFC PR4 EU regulations International standards including WHO limits, IFC Environmental, Health and Safety General Guidelines and IFC EHS Guidelines for health care facilities; Turkish law</p>	<p>Measures to be identified in ESMP and verified through external monitoring. Evidence of disclosure and updates</p>	<p>Implementation due prior to commencement of operational phases.</p>	<p>O&M contractor</p>
4.2	<p>Infection Control Plan and Committee to be established as critical priority</p>	<p>EBRD PR4 IFC PS4 IFC EHS Guidelines</p>	<p>Infection Control Plan for the hospital complex and for the neighbouring communities/the public Minutes of meetings Actions undertaken by committee Plan for Lender's review O & M has a specific manager to be in charge of the task</p>	<p>On-going And prior to commencement of the hospital</p>	<p>O&M contractor/MoH</p>
4.3	<p>Carry out regular drills/exercises of emergency measures.</p>	<p>EBRD PR 4 IFC PS4</p>	<p>Records of drills</p>	<p>On-going</p>	<p>O&M contractor</p>
4.4	<p>Document discussion of any identified impacts, risks and mitigations with communities as necessary during operation.</p>	<p>EBRD PR4 IFC PS4</p>	<p>Records of meetings to be kept on file.</p>	<p>On-going</p>	<p>O&M contractor</p>
4.5	<p>Background checks on all staff to be employed in serving the public to check for past abuses.</p>	<p>EBRD PR4 IFC PS4</p>	<p>Records of checks kept in individual's personnel files.</p>	<p>Prior to commencement of operation.</p>	<p>O&M contractor</p>

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4.6	Update security policy and plan. Special consideration to be given in the security policy and plan to collaboration with Ministry of Health and Ministry of Justice in their plans for security at the forensic hospital and other secure parts of the hospital, to the needs of patients, members of the community and staff.	EBRD PR4 IFC PS4	Updated security policy and plan.	Prior to commencement of operation.	O&M contractor/MoH/MoJ
4.7	Ensure the health and safety file is kept up to date with relevant health and safety information and relevant parts reviewed by contractors undertaking any maintenance, construction or demolition	EU Directive 92/57/EEC	Report in the Annual Report to Lenders information on health and safety file updates	On going	OHS Manager

PR 10/PS1 –Information Disclosure and Stakeholder Engagement

10.1	SEP to be updated when the Project moves into the operational phase including adequate venues/ways to communicate with the patients and public about the O & C company's operation of the hospital complex	EBRD PR10 IFC PS1	Updated and disclosed SEP	Prior to operational phase.	O&M contractor
10.2	O&M contractor implement grievance mechanism. CLO to maintain records of grievances and correspondence with complainants. Put grievance mechanism contact details on publications such as leaflets and signage and make available during public and other meetings (such as on a	EBRD PR10 Equator Principle 6 IFC PS1	Grievance log; Correspondence with complainants; Evidence of grievance mechanism contact details on leaflets, signage and other public material.	On-going	O&M contractor

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	presentation slide, or on a grievance form).				
10.3	Documentation of all consultation and information disclosure to be kept on record.	EBRD PR10 Equator Principle 5 IFC PS1	Consultation activity log; and Minutes of meetings.	Ongoing.	O&M contractor
10.4	Annual reporting on implementation of ESMP and any new impacts and risks identified to affected communities.	EBRD PR10 IFC PS1	Evidence of disclosure and availability (web page etc) Reports available to external monitors	Annually	O&M contractor
10.5	Communicate with the patient and public about the hospital operation with the MoH	PR10 IFCP5	Develop adequate communication venues with the MoH about the operation of the hospital for the patient and public	Within one and half year of the operation	O &M and MoH