



Environmental and Social Action Plan (ESAP) for Gaziantep Integrated Health Campus

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Environmental and Social Action Plan (ESAP) for Gaziantep Integrated Health Campus:

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Engineering



a company of



For and on behalf of
Environmental Resources Management

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Date: 21st October 2016

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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 impact assessment (ESIA) of the construction and operation of the Gaziantep Integrated Healthcare Campus (IHC) ('the Project').

Based on the gap analysis work undertaken as part of the ESIA, *Table 1.1* to *Table 1.3* present 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, EIB Standards and IFC Performance Standards and IFC EHS Guidelines;
- 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 reports and the client's annual environmental and social report must address the implementation status of the ESAP at each stage of the Project. 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.

Table 1.1 Pre-investment Phase ESAP

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
PR1: Environmental and Social Appraisal and Management						
1.1	Environmental and Social Management System (ESMS)	EBRD PR1, PR2 IFC PS1, PS2 EIB Standard 1 & 8 Best practice IFC General EHS Guidelines	A clear and functioning stand-alone ESMS is required that clearly defines the Project's E&S system (including for the implementation of the environmental, health, safety and social plans) to include the following aspects: - The ESMS will be developed and implemented in line with international good practice and guidelines including: ISO 9001:2008, ISO 14001:2004 and OHSAS 18001:2007. - A clear organisational structure for the implementation of the ESMS (both for construction and operation) to be developed. The structure should clearly show Environmental, Health and Safety (EHS) roles and responsibilities. - Appointment of a qualified Environmental, Health and Safety and Social Manager at SPV level throughout both construction and operation to monitor and implement to implement the ESMS; and be accountable for the Project's (and its contractors/suppliers') compliance with Lenders' E&S standards.	EPC / EPC JV Contractor Construction Site Manager Oversight by Gaziantep IHC SPV	Prior to financial close. The ESMS will be implemented throughout construction phase.	An approved ESMS and the corresponding system in place. Management Plans in place. Review of ESMS and Management Plans and other ESMS documentation by the Lenders' Technical Advisors (LTA). Implementation audits and records of staff receiving relevant documentation, policies, code of conduct and procedures.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			The Project already has several Management Plans in place for construction. They must be revised to ensure all relevant mitigation measures outlined in the overall Project ESMMP are incorporated.			
1.2	Contractor Compliance	EBRD PR1, PR2 IFC PS1, PS2 EIB Standard 1 & 8 Best Practice	Include clauses in contracts requiring compliance with Project HR Policy, ESMMP, all Management Plans linked to the ESMMP.	Gaziantep IHC SPV Management	Prior to financial close	Review of contracts by the LTA to ensure that contains appropriate clauses that require contractors and sub-contractors to comply with EHS requirements and actions set out in the ESIA and ESMMP in line with Lender requirements.
1.3	EHS Training	EBRD PR1, PR2 IFC PS1, PS2 EIB Standard 1 & 8 Best Practice	EHS training to be provided to all Project staff and contractors in EHS, Workers' Code of Conduct and relevant management plans and procedures.	EPC / EPC JV Contractor EHS Manager	Prior to deployment of staff & continuously, as needed	Training programme records and numbers of employees receiving training. Evidence of how Code of Conduct distributed to workers. Training materials.
1.4	Tri-generation plant / boiler and concrete batching plant	Best practice, National EIA Law	The SPV should seek the official opinion of the Gaziantep Provincial Directorate of Environment and Urbanisation (PDoEU) for EIA exemption and if an EIA is required, Project Information Files (PIFs) for these	Gaziantep IHC SPV Management	Immediately	An opinion letter will be obtained from Gaziantep PDoEU if facilities are exempt from EIA. If an

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			facilities should be prepared and submitted to Gaziantep PDoEU in accordance with EIA regulation.			EIA is required, final approval and permit will be obtained and shared with Lenders and LTA
1.5	Turkish EIA exemption	National EIA Law	The SPV is required to obtain formal opinion and confirmation from the Ministry of Environment and Urban Planning (MEUP) that the Project does not fall within the scope of Annex 1 or 2 of current EIA legislation. The completion of this action will be subject to either the decision of the Turkish Competent Authority and that no EIA is required; or to the satisfactory conclusion of the national EIA process provided that an EIA is required under national law.	EPC / EPC JV Contractor Construction Site Manager	Prior to first financial drawdown	SPV is obtaining EIA Exemption Letter.
1.6	Seismic Risk	National legislation Best practice	Design the Project in accordance with Turkish regulations and standards for protection against seismic activity. Comply with the Regulation on Buildings to be constructed in Seismic Zones and take into account the defined parameters to be used in the design of structures located in 3rd degree seismic zone where the Project site is located.	EPC / EPC JV Contractor	Prior to construction phase	Design records.
1.7	Permitting	EBRD PR 1, IFC PS 1, EIB Standard 1, National legislation	Prepare and implement a 'Legal and Other Requirements Determination and Compliance Register. Determine legal permits/consents/approvals needed to be obtained and identify existing gaps. Prepare a 'Legal and Other	EPC / EPC JV Contractor and Gaziantep IHC SPV.	Prior to date on which relevant permit is required for construction activity	A written and approved 'Legal and Other Requirements Determination and Compliance Register and comprehensive 'Legal and Other Requirements

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			Requirements Follow-up' List covering permits/consents/approvals. Obtain all necessary outstanding permits.			Follow-up List'. Records of permits, official letters, approvals, etc.
1.8	Construction methods	EBRD PR1, IFC PS1, EIB Standard 1	Prepare a Construction Management Plan which outlines construction methods for major construction activity.	EPC / EPC JV Contractor Site Manager	Prior to financial close	Construction Management Plan in place. Lender / LTA review
PR2: Labour and Working Conditions						
2.1	Human Resources Policy	EBRD PR2, IFC PS2, EIB Standard 8 & 9	Ensure HR Policy currently in place for SPV and EPC contractor staff are in line with EBRD PR2, IFC PS2 and EIB Standards 8&9 for both construction and operation phases. The HR Policy will apply to all contractors and contract staff. Ensure that all workers (including full, part-time, short term) are aware of its content. Ensure the Policy states commitments to equal opportunity and allowing workers to join a trade union as well as a commitment to engage with union representatives when required.	EPC / EPC JV Contractor with oversight by Gaziantep IHC SPV	Prior to financial close	HR Policy document review by Lenders and LTA. Records of distribution and training to staff on the HR Policy and their rights. HR Policy displayed on selected notice boards around the site.
2.2	Worker contracts for EPC contractor and other contractors	EBRD PR2, IFC PS2, EIB Standard 8	Develop worker contracts that are compliant with the overall requirements of EBRD PR2/IFC PS2/EIB Standard 8 and ILO core labour standards.	Gaziantep IHC SPV E&S Manager, EPC / EPC JV Contractor Site Manager	Develop template prior to financial close	Template contracts available for review by LTA.
2.3	Workers' Accommodation	EBRD PR2, IFCC PS2, EIB Standard	Develop a Workers' Camp Management Plan detailing how provisions will be made for	EPC / EPC JV Contractor Site	Prior to financial	Workers' Camp Management Plan in

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
		9 EBRD/IFC Guidelines for Temporary Accommodation	compliance with Lender performance requirements and EBRD/IFC Guidelines for Temporary Accommodation.	Manager	close	place. Review by LTA.
2.4	Worker Grievance Mechanism	EBRD PR2, IFC PS2, EIB Standard 8	Develop a worker grievance mechanism in line with EBRD PR2 / IFC PS2 and EIB Standard 8 and 10. Commit to resolving grievances within specified timeframes. Commit to taking action to prevent recurrence of grievances where appropriate.	EPC / EPC JV Contractor Site Manager with oversight by the Gaziantep IHC SPV Management	Prior to financial close	Grievance mechanism in place. Review by LTA. A grievance log that contains grievances, date received, person responsible, action taken and date resolved or escalation.
2.5	Occupational Health and Safety	EBRD PR2, IFC PS2, EIB Standard 9 National legislation	Develop an Occupational Health and Safety Plan to identify health and safety risks of each activity during construction followed by identification of appropriate mitigation measures, including Emergency Response Measures. The Plan is to be communicated to all subcontractors and subcontractor workers; and updated as necessary. Set up a centralised Reporting System on any OHS related accidents in the Gaziantep IHC SPV and in contractors while performing tasks for the Project. Appoint an Occupational Health & Safety	EPC / EPC JV Contractor Site Manager	Prior to financial close	OHS Plan in place. Records of incidents, accidents and near misses, hours worked and man-hours lost. Records of training received by staff including number of participants. Written evidence in the form of a report must be provided.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			Manager for construction with clearly defined responsibilities. Provide first-aid training to relevant workers as required by national legislation. Provide safety and induction training to workers.			OHS manager in place.
2.6	Local content	EBRD PR2, IFC PS2	Include a policy statement that demonstrates commitment to promote and support local employment and purchasing / procurement.	EPC / EPC JV Contractor Site Manager	Prior to financial close	Policy review by LTA.
PR3: Pollution Prevention and Abatement						
3.1	Waste / Wastewater	EBRD PR3 IFC PS3 EIB Standards 1&2 Best Practice	Obtain necessary permits related with the disposal of wastes (eg. Excavated soil, wastewater etc.)	EPC / EPC JV Contractor	Prior to construction phase	Official correspondence with the relevant authorities.
3.2	Noise	EBRD PR3, IFC PS3, EIB, EIB Standard 2 National legislation	Obtain necessary permits related with night time construction if night time construction is required.	EPC / EPC JV Contractor	Prior to night time construction	Official correspondence with the relevant authorities. Necessary permit/approval in place.
3.3	Greenhouse gases	EBRD PR IFC PS3, EIB Standard 4	Conduct an analysis of the selected tri-generation plant compared to other heating and power options to evaluate the GHG performance.	Gaziantep IHC SPV Management	Prior to purchase of tri-generation plant and prior to financial close	Lender/LTA review.
PR4: Community Health, Safety and Security						
4.1	Emergency	EBRD PR4, IFC	Ensure Emergency Preparedness and	EPC / EPC JV	Prior to	Lender / LTA review of

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
	Response	PS4, EIB Standard 9 Best practice	Response Plan is compliant with the provisions of EBRD PR4, IFC PS4 and EIB Standard 9. The Emergency Preparedness and Response Plan shall be shared with the community and local authorities.	Contractor Site Manager	financial close	existing Plan. A written statement and photographic evidence of engagement with local authorities and the community, demonstrating Plan has been shared. The Plan will also be shared on the SPV website.
4.2	Security Management	EBRD PR4, IFC PS4, EIB Standard 7&9 National legislation Best practice	Security Management Plan will be developed aligned with the principles of EBRD PR4, IFC PS4 and EIB Standard 9. Personnel needs shall be vetted for past criminal offences, use of force and human rights violations. Ensure the Plan incorporates the Voluntary Principles on Security and Human Rights, UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials, the UN Code of Conduct for Law Enforcement Officials and the International Code of Conduct on Private Security Providers. The Plan will also detail the company's position on the 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.	EPC / EPC JV Contractor Site Manager with oversight by Gaziantep IHC SPV	Prior to financial close	Review of Security Management Plan by Lenders / LTA. Written evidence of personnel vetting process will be provided.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
4.3	Life and Fire Safety	EBRD PR4, IFC PS4, EIB Standard 9 NFPA	Implement a third party life and fire safety audit and appoint a Life and Fire Safety Expert (third party) acceptable to Lenders to oversee the preparation and implementation of a Life and Fire Safety Master Plan. The Plan will ensure that the Project must be designed, constructed and operated in compliance with national building requirements (Official Gazette 26735 Dated 19.12.2007), local fire department regulations, national legal/insurance requirements and in accordance with internationally recognised Life and Fire Safety Code. The Plan will incorporate a Corrective Action Plan if remediation measures are to be implemented to comply with internationally accepted life and fire standards (e.g. NFPA Standards, IBC Codes and EN Standards). The Plan and relevant future appointments will be shared with Lenders. A Life and Fire Safety Expert will be appointed prior to financial close. They will be responsible for the review of systems and commissioning and certify that the construction of the life and fire safety system has been carried out in accordance with the accepted design and master plan as the Project develops post financial closure and throughout construction.	Gaziantep IHC SPV Management	Prior to first disbursement and construction	Third party audit Design certification.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			The SPV must have regular maintenance and operational checks of life and fire safety provisions. All provisions for disability access are in place in compliance with international standards.			
4.4	Workers' Conduct	EBRD PR4, IFC PS4, EIB Standard 9	A Workers' Code of Conduct will be implemented to guide / manage worker interactions and behaviour outside the camp with local residents as well as behaviour on the construction site and in the camp.	Gaziantep IHC SPV applicable to EPC / EPC JV Contractor Site Manager and all other contractors	Prior to construction	Workers' Code of Conduct in place and available on notice boards around the site. Records of training received by workers on the Code of Conduct.
4.5	Perimeter Fence	EBRD PR4, IFC PS4, EIB Standard 9	As part of the Construction Management Plan, a perimeter fence will be extended across boundary with TOBB High School.	EPC / EPC JV Contractor Site Manager	Immediately	Fence in place.
PR6: Biodiversity Conservation and Sustainable Management of Living Natural Resources						
6.1	Threatened Species	EBRD PR6, IFC PS6 EIB Standard 3	Undertake check surveys prior to any construction activity for the presence of spur-thighed tortoise and relocate any individuals to suitable nearby habitat outside of the Project site boundary.	EPC / EPC JV Contractor Site Manager	Immediately	Records of surveys. Review by LTA.
PR8: Cultural Heritage						
8.1	Chance Finds	EBRD PR8, IFC PS8, EIB Standard 5 National legislation	Ensure that the Archaeological Chance Finds Management Procedure is implemented and all workers are trained and understand its contents.	EPC / EPC JV Contractor Site Manager	Prior to financial close	Records of training and distribution of Procedure.
PR10: Information Disclosure and Stakeholder Engagement						
10.1	Safety engagement	EBRD PR4, PR10, IFC PS4, PS1 EIB Standard	Undertake regular safety awareness campaigns with local residents and the school and teachers of TOBB High School.	EPC/EPC JV Contractor Site Manager	Prior to construction	Records of safety meetings and announcements.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
		9&10	Awareness raising campaigns will focus on road traffic, construction activities and the presence of workers and security services. Public announcements will be made and safety information distributed through leaflets to local residents, social centres and neighbourhood Muhtars.			Leaflet distribution records.
10.2	Information disclosure	EBRD PR10, IFC PS1, EIB Standard 10	Information disclosure will be undertaken to publicise the ESIA, NTS and SEP on the Gaziantep IHC SPV Management website and through public announcements and in national and local newspapers. Publicise the grievance mechanism including contact details of responsible staff to address grievances.	Gaziantep IHC SPV Management EPC/EPC JV Contractor Site Manager	1 September 2016 for disclosure and updated ESIA, NTS and SEP prior to signature	Records of disclosure. Information on website. Update of ESIA, NTS and SEP to integrate comments received following disclosure.
10.3	Stakeholder Engagement Plan	EBRD PR10, IFC PS1, EIB Standard 10	Update the SEP as Project moves into construction phase and as relevant following disclosure.	EPC/EPC JV Contractor Site Manager	Prior to construction	SEP review by LTA.

Table 1.2 **Construction Phase ESAP**

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
1.1	ESMS EHS Training	EBRD PR1, PR2, IFC PS1, PS2, IFC EHS Guidelines, EIB Standards 9	Develop a Project specific ESMS and EHS training programme. Training will be provided on the Project specific ESMS that will include, at a	EPC/EPC JV Contractor Site Manager	The ESMS / ESMMP will be implemented throughout the	Review of documentation. Records of worker

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			minimum, training all core ESMS management plans. Organisational chart to be updated. Appointment of a qualified Environmental, Health and Safety and Social Manager at SPV level throughout both construction and operation to monitor and implement to implement the ESMS; and be accountable for the Project's (and its contractors/suppliers') compliance with Lenders' E&S standards		construction phase	training and information on notice boards around the site. Updated organisational chart.
1.2	ESMS/ESMMP Compliance	EBRD PR1, IFC PS1, EIB Standard 1	Monthly progress reporting to EBRD / EIB on ESMMP implementation	Gaziantep IHC SPV Management	During construction phase	Monthly progress reports to be provided to Lenders.
1.3	Permitting	EBRD PR1, IFC PS1, EIB Standard 1 National legislation	All necessary outstanding permits/approvals/consents will be obtained as identified in the 'Legal and Other Requirements Follow-up List'. Prior to installation of the tri generation plant and boilers, the SPV will ensure that official opinion of the Gaziantep PDoEU has been obtained and necessary PIFs prepared and submitted in accordance with EIA regulation.	EPC/EPC JV Contractor Site Manager with oversight by Gaziantep IHC SPV	During construction phase but 6 months prior to operation	Records of permits, official letters, approvals and consents.
1.4	Seismic risk	National legislation	Undertake construction activities for protection against seismic activity in line with relevant national regulation	EPC/EPC JV Contractor Site Manager	Prior to / during construction phase	Construction inspection records.
1.5	Hospital Management	EBRD PR1, IFC PS1, IFC EHS Guidelines, EIB Standard 1	Discussion with the MoH about the process to apply international hospital management benchmarks and ensure international best practice.	Gaziantep IHC SPV Management	During construction phase	Records / minutes of discussions with MoH and agreements to be reviewed by Lenders.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			Agree a common hospital management benchmark.			
1.6	Construction methods	EBRD PR1, IFC PS1, EIB Standard 1	Provide major construction activity method statements / commitments in line with good practice and to manage and monitor construction phase environmental and social risks and issues.	EPC / EPC JV Contractor Site Manager	During construction phase	Lender / LTA review
PR2: Labour and Working Conditions						
2.1	Health and Safety	EBRD PR2, IFC PS2, IFC EHS Guidelines EIB Standard 8 & 9 National legislation	Implement the Occupational Health and Safety Plan based on a risk analysis for the construction period using international benchmarks such as IFC EHS Guidelines for Construction and Decommissioning. OHS Manager with clearly defined responsibilities recruited for the construction phase. Develop method statements for each work activity for major construction activities. Ensure all construction staff is provided with adequate training and Personal Protective Equipment. OHS signs to be clearly placed on notice boards around the site. Ensure medical first aid on site and emergency transfer and a centralised recording and reporting system of any OHS related accidents and incidents. Ensure all workers are aware of who the	EPC/EPC JV Contractor HSE Manager	During construction phase	OHS Plan in place and reviewed by LTA. Lenders to visit the site at a minimum of once per year to undertake monitoring. Material OHS concerns/issues to be reported promptly to Lenders. Information on OHS management to be provided in annual reports. Inspection reports.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			first aiders are. Keep records of next of kin contact details in each worker's personnel file. Comply with health and safety legislation applicable to the construction phase of the Project. EPC Contractor safety officers to carry out regular inspections of site safety and PPE use on site. Ensure young people are not employed in hazardous work.			
2.2	Human Resources Policy	EBRD PR2, IFC PS2 EIB Standard 8	Implement the Human Resources Plan. Appointment of a HR Manager for the construction phase. Issue contracts to all workers which comply with all the requirements of EBRD PR2, IFC PS2, EIB Standard 8. Develop a database of employees and subcontractor employees that includes information on age, social security number, identity card number, gender, ethnicity, nationality and home town. Undertake payroll checks by EPC Contractor against issues such as subcontractor wages, payment of benefits and timely payments to workers.	EPC/EPC JV Contractor HR Manager Gaziantep IHC SPV	During construction phase and maintain regularly throughout Project.	Worker contracts. Personnel files. Database of employees. Brief quarterly reports available for review by external monitors / LTA. Adequate staff is hired and present to ensure the correct implementation of the human resource plan is assured.
2.3	Worker Protection	EBRD PR2, IFC PS2		EPC/EPC JV	Develop prior	Monitoring through

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
		EIB Standard 7& 8 National legislation	Ensure individual and contract labour contracts comply with the requirements of Lenders. Ensure migrant and/or immigrant construction workers (including Syrian refugees) human rights are fully respected and receive the same benefits and wages for equivalent work to Turkish nationals. Ensure that there is no discrimination, no child labour and no forced labour.	Contractor Site Manager Gaziantep IHC SPV	to commencement of construction and implemented during construction phase	Lender / LTA specialist site visits. Records of worker grievance. Payroll data and worker contracts available for review. Annual audits to ensure no discrimination, child labour or forced labour is occurring on site.
2.4	Worker Grievance	EBRD PR2, IFC PS2 EIB Standard 8	Implementation of worker Grievance Mechanism. Publicise Grievance Mechanism to workers and ensure information is available on notice boards. Respond to grievances in a timely manner, in accordance with the provisions of the Grievance mechanism. Undertake necessary corrective actions to prevent recurrence of grievances where appropriate.	EPC/EPC JV Contractor Site Manager Gaziantep IHC SPV	During construction phase	Grievance log including records of grievance and responses and / or corrective actions. The grievance log must include the person who is responsible for addressing the grievance.
2.5	Workers' Accommodation	EBRD PR2, IFC PS2 EIB Standard 9	Implement Workers' Camp Management Plan. If temporary accommodation is provided, it needs to comply with EBRD/IFC Guidelines for Temporary Accommodation. Undertake internal and external (third	EPC/EPC JV Contractor Site Manager Gaziantep IHC SPV	During construction phase	Audit reports. Grievance log.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			party) regular audits of workers' camp facilities within a frequency required by Lenders.			
2.6	Subcontractor Management	EBRD PR2, IFC PS2, EIB Standard 8&9 IFC EHS Guidelines	Implementation of Subcontractor management and monitoring including checks for compliance of sub-contractors with HR and EHS policies and procedures. Require all subcontractors to adopt the HR and EHS policies and procedures and a worker grievance mechanism through contract clauses. Require all subcontractors to report accidents, incidents and safety non-compliance through contract clauses. Include pass/fail criteria for subcontractors based on EHS performance when renewing bids. 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 any issues in line with Lender requirements. All sub-contractors will sign an anti-corruption and responsible procurement policy or have provisions for responsible procurement in contract clauses.	EPC /EPC JV Contractor Site Manager Gaziantep IHC SPV	During construction phase and prior to procurement from major suppliers. Records to be maintained regularly throughout Project.	Contracts with subcontractors Subcontractor list. Records of subcontractor non-compliance, accidents and incidents and grievance log. Subcontractor personnel files. Subcontractor training records for EHS. Records on EHS and grievance mechanism distribution. Subcontractor performance monitoring reports. Supplier audit reports.
2.7	Supply of materials	EBRD PR2	Supply materials as close as possible to	EPC/EPC JV	During	Contracts with

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
		IFC PS2 Best practice	the Project site. Supply materials from licensed/certificated suppliers/facilities. Prefer to the extent possible recycled materials and materials certified as 'green' and low carbon.	Contractor Site Manager	construction phase	subcontractors. Subcontractor list. Records of subcontractor's accidents, incidents and non-compliances. Subcontractor personnel files. Subcontractor training records for EHS. Evidence of how workers are informed about the grievance mechanism. Grievance log.
2.8	Independent labour audit	EBRD PR2 IFC PS2 Best practice	The SPV will undertake an independent labour audit to ensure the project complies with PR2 requirements.	Gaziantep IHC SPV	Annual audits during construction phase	Third party audit will include key PR2 measures including contracts, health and safety, worker protection, grievance, worker accommodation, forced and child labour.
PR3: Pollution Prevention and Abatement						
3.1	Soil, Surface Water and Groundwater	EBRD PR3 IFC PS3 and EHS Guidelines EIB Standard 2 Best practice National legislation	Adopt good construction site practices for the protection of soil, surface water and groundwater (eg storage areas, spillage control, spill kits etc. Keep spill response kits at designated areas with specific instructions for	EPC/EPC JV Contractor	During construction phase / ongoing Monthly Reporting	Records of periodical site inspections. Presence of spill response kits on construction site.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			their use and train site staff on the use of spill kits. Close the existing groundwater well at the Project site by cement grout. In case a future demand for use of groundwater occurs, obtain necessary permission from the authorities. Implement following plans: • Hazardous Material Management Plan. • Emergency Preparedness and Response Plan. • Waste Management Plan. • Train construction workers on environment related practices.			Records of monitoring of the implementation of the relevant plans. Official correspondence with the relevant authorities. Audit and control results, spillage incident records, measurement results, contaminated soil disposal records, training records and similar.
3.2	Hazardous materials	EBRD PR3/PR4 IFC PS3/PS4 EIB Standard 2 Best Practice National legislation	Implement Hazardous Material Management Plan. Prepare an inventory of hazardous materials. Obtain Material Safety Data Sheets (MSDSs) and provide in relevant locations. Make Personal Protective Equipment (PPE) available for relevant personnel. Train relevant personnel. Take required onsite measures.	EPC/EPC JV Contractor	During construction phase	Records of audits. Hazardous material inventory. Site inspections. Incident records. Training records.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			Keep hazardous materials at designated areas. Hazardous material storage will be in compliance with IFC Guidance. Locate suitable fire-fighting equipment close to hazardous material storage/usage areas			
3.3	Waste Management	EBRD PR3 IFC PS3 EIB Standard 2 Best practice National legislation	Implement following plans: - Waste Management Plan. - Emergency Preparedness and Response Plan. - Hazardous Material Management Plan. Collect, segregate label and store, transport, recycle wastes in line with the Waste Management Plan. Design and construct a designated waste storage area to ensure that hazardous wastes are properly stored at the construction site. Dispose wastes at licensed facilities according to their category in accordance with regulatory requirements. Keep records of waste generation, storage and disposal. Use licensed haulers for the transport of wastes and keep waste transfer certificates.	EPC / EPC JV Contractor	During construction phase / ongoing Monthly Reporting (of Construction)	Records of periodic site inspections conducted to check all wastes are separately collected, segregated, labelled and stored in designated areas. Disposal records of all types of wastes. Disposal records of excavated soil. Check waste disposal contracts. Licenses of haulers' and disposal facilities'. Declaration records made to the Ministry of Environment and Urban Planning (MEUP). Training records of staff.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			Ensure disposal of wastes at licensed facilities. Train site workers for waste management practices.			All 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.
3.4	Wastewater	EBRD PR3 IFC PS3 EIB Standard 2 National legislation	Discharge domestic wastewater to the municipality infrastructure in accordance with the permits and protocols for connection to the municipal sewer system. Monitor effluent regularly if required by Gaziantep Water and Sewage Administration.	EPC / EPC JV Contractor	During construction phase	A Temporary Connection Permit has been issued by GASKI. A permanent one will be issued once the Workers' Camp is in operation. Once obtained this permit will be shared with the LTA. Regular effluent analysis results.
3.5	Waste / Wastewater	EBRD PR3 IFC PS3 EIB Standard 2 Best Practice	Obtain necessary permits related with the disposal of wastes (eg. Excavated soil, wastewater etc.).	EPC / EPC JV Contractor	Prior to construction	Official correspondence with the relevant authorities.
3.6	Noise Monitoring	EBRD PR3, IFC PS3, EIB Standard 2 Best Practice	Implement Noise and Vibration Management Plan. Obtain consent from Gaziantep Provincial Directorate of Environment and Urban Planning for undertaking any construction activities during evening and night time. Undertake a monthly noise monitoring	EPC / EPC JV Contractor	During construction with ongoing monthly reporting	Monthly noise monitoring report. Necessary approval letter/permit for night time and evening work.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			programme at sensitive receptors (TOBB High School and nearby residential buildings – ie R4 and R5) to test effectiveness of noise reduction measures.			
3.7	Air Emissions	EBRD PR3, IFC PS3, EIB Standard 2 National legislation Best Practice	Implement the Air Quality Management Plan and Traffic Management Plan. Enforce traffic speed control measures on unpaved surfaces. Regular inspection and maintenance of construction plant and equipment will be undertaken. Third party monthly monitoring of meteorological conditions (wind speed, wind direction, temperature and precipitation as a minimum), PM₁₀ and ambient dust levels throughout construction phase.	EPC / EPC JV Contractor Environmental Manager	During construction phase	Records of site inspections. Records of air quality monthly monitoring by a third party expert. Equipment and vehicle maintenance records. Training records for staff.
PR4: Community Health, Safety and Security						
4.1	Community Health and Safety	EBRD PR4, IFC PS4, EIB Standard 9	Implement all community health and safety measures for the construction phase including: • Emergency Preparedness and Response Plan (EPRP). • Construction Management Plan. • Traffic Management Plan. • Stakeholder Engagement Plan. • Stakeholder Grievance Mechanism. • Security Management Plan Disclose EPRP to local residents and	EPC / EPC JV Contractor Construction Site Manager Gaziantep IHC SPV	During construction phase	Audits of Plan implementation by LTA or other external auditors. Written records and photographic evidence of EPRP disclosure to local residents and TOBB high school. Records of drill exercises

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			TOBB High School in accordance with Lender requirements. Undertake regular drills/ exercises of emergency measures and update local authorities and local residents if there are any chances to emergency procedures. Ensure workers are adequately trained to respond to emergency and EHS issues. Maintain roads in the case of any physical damage as a result of construction activities and implement road safety measures in accordance with the Traffic Management Plan. Maintain adequate security along the perimeter fence adjacent to TOBB High School. Document discussions of any identified impacts, risks and mitigations with local residents during at least annually.		Ongoing Prior to construction phase Ongoing Ongoing Ongoing	including activity and date. Records of training undertaken by staff and attendance.
4.2	Security Management	EBRD PR4, IFC PS4, EIB Standard 9 National legislation	Implement Security Policy and Plan. Security personnel will be vetted for past criminal offences, use of force and human rights violations. Ensure security contract firm recruits adequate, trained security staff who have not been involved in past security abuses.	EPC / EPC JV Contractor Construction Site Manager Gaziantep IHC SPV	During construction phase	Audit and inspection reports. Security personnel credentials records with written evidence of the security personnel vetting process to be provided.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
						Training records for security personnel.
PR8: Cultural Heritage						
8.1	Chance Finds	EBRD PR8, IFC PS8 EIB Standard 5	Implement Archaeological Chance Finds Management Procedure. Contact relevant authorities (ie Museum Directorate) in the case of any chance finds.	EPC / EPC JV Contractor Construction Site Manager	During construction phase	Records of chance finds. Copies or correspondence with Museum Directorate.
PR10: Information Disclosure and Stakeholder Engagement						
10.1	Stakeholder Engagement Plan	EBRD PR1, PR10, IFC PS1 EIB Standard 10	The SEP to be updated if there are significant changes to the Project and once the Project changes from construction to operation phase. All consultation shall be documented, including safety awareness campaigns and meetings with TOBB High School. Implement safety awareness programme with local residents and TOBB High School on the dangers of trespass and road safety. Annual reporting to Lenders on the implementation of the ESMMP and any new impacts or risks identified to affected local residents or other stakeholders.	Gaziantep IHC SPV	During construction phase	Review of SEP. Records of consultations and meetings and safety campaigns. Records to include photographic evidence and attendance lists, which will be provided for consultations.
10.2	Grievance Mechanism	EBRD PR1, PR10, IFC PS1 EIB Standard 10	Implement the grievance mechanism. Respond to grievances in a timely manner in accordance with mechanism. Undertake necessary corrective actions.	EPC / EPC JV Contractor Oversight by Gaziantep IHC E&S Manager	During construction phase	Grievance log.

Table 1.3 **Operation Phase ESAP**

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
PR1: Environmental and Social Appraisal and Management						
1.1	ESMS		Update of the ESMS for the Operation Phase. This is a stand-alone document for the construction and operation of the Project. Develop and implement the ESMS in accordance with international best practice and guidelines (ie ISO 9001:2008, ISO 14001:2004, OHSAS 18001:2007). Undertake the necessary consultation with the MoH during updating of the ESMS for operation. Establish and organisational structure for the implementation of the ESMS in cooperation with the MoH. Appointment of a qualified Environmental, Health and Safety and Social Manager at SPV level throughout both construction and operation to monitor and implement to implement the ESMS; and be accountable for the Project's (and its contractors/suppliers') compliance with Lenders' E&S standards Implementation of the updated ESMS	Service Provider Gaziantep IHC SPV and MoH (as necessary)	Prior to operation phase	An approved and updated ESMS for operation. Established ESMS supporting documentation (risk assessments, plans, procedures, control forms, etc). Established organisational structure and defined roles and responsibilities for E&S. Appointment of an Environmental and Social Manager and Team for operation service provider. Lender review and approval of site specific environmental and social management plans and procedures. ESMS system records, audit records, training records and performance measurement records, etc.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			and ESMP. Undertake regular monitoring and reporting in line with the ESMS. Updating existing Management Plans as relevant and additional Management Plans will be required for Operation. Some will be adapted from Construction Phase management plans while others will be developed. They include: • The overall Project ESMP. • Air Quality Management Plan. • Emergency Preparedness and Response Plan. • Healthcare Waste Management System. • Water and wastewater Management Plan (separating wastewater from Oncology hospital and Main hospital. • Health Campus Internal Traffic Management Plan. • Hazardous Material Handling Procedure and Management Plan. • Human Resources Policy. • Occupational Health and Safety Management Plan. • Patients' Rights Charter. • Security Management Policy and Plan. • Stakeholder Engagement Plan. • Stakeholder Grievance Mechanism (to include provisions			

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			for hospital users and visitors). Worker / Staff Grievance Mechanism			
1.2	Testing and commissioning	EBRD PR 1, IFC PS1, EIB Standard 1 National legislation	All relevant commissioning tests to be carried out successfully.	EPC / EPC JV Contractor	Prior to operation phase	Records of commissioning tests.
1.3	Permitting	EBRD PR 1, IFC PS1, EIB Standard 1 National legislation	All relevant commissioning tests to be carried out successfully. Obtain all necessary approvals for the commencement of the Hospital. Update all necessary permits/consents/approvals as needed prior to and during operation.	Service Provider Gaziantep IHC SPV and MoH (as necessary)	Prior to operation phase	Records of permits, official letters, licenses, approvals, documents, etc. Records of testing and audits as per the requirements of permitting.
1.4	Service Provider Compliance	EBRD PR1, PR2, IFC PS1, PS2, EIB Standard 1&8	Ensure Service Provider contracts include clauses requiring compliance with Project HR Policy, ESMMP measures, EHS and other plans linked to the ESMMP and ESMS and core ILO Labour standards.	Gaziantep IHC SPV Management	Prior to appointment of service provider	Review of contract requirements by Lenders / LTA to ensure it contains appropriate clauses.
1.5	Health Care Waste Management System (HWMS)	IFC EHS Guidelines for Health Care Facilities	Establish a HWMS as per IFC Requirements. Undertake necessary consultation with MoH during the development of the HWMS.	Service Provider of the Gaziantep IHC SPV Gaziantep IHC SPV	Prior to operation phase	HWMS documentation.
1.6	Health Care Waste Management System (HWMS)	IFC EHS Guidelines for Health Care Facilities	Implementation of the HWMS.	Service Provider of the Gaziantep IHC SPV Gaziantep IHC SPV	During operation phase	Records of audits and inspections. Records of healthcare waste management, storage, transport and disposal.
1.7	Procurement	EBRD PR1, PR2, PR6 IFC PS1, PS2, PS6	The service provider to adopt procedures for sustainable	Service Provider of the Gaziantep	Prior operation	Review of procedures for sustainable and responsible

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
		EIB Standard 3 & 8	procurement and include environmental and social requirements for procurement and future services.	IHC SPV Gaziantep IHC SPV		procurement by LTA.
1.8	Hospital Third Party Audit	IFC EHS Guidelines for Healthcare Facilities	Hire a third party environmental and social specialist acceptable to Lenders. The specialist will carry out a third party environmental and social audit of the Project in accordance with IFC EHS Guidelines for Health Care Services and Lender requirements and standards following the commencement of operation. Audit to be carried out every three years. Remediate gaps in the audit report	Gaziantep IHC SPV	Within one year of commencement of operation	Audit report (submitted for Lender review). Remedial actions report.
1.9	Life and Fire Safety	EBRD PR2, IFC PS2, IFC EIB Standard 9 EHS Guidelines	Follow up on the construction phase Life and Fire Safety Audit to develop a Life and Fire Safety Master Plan in accordance with EHS Guidelines for Healthcare Facilities. Undertake necessary systems testing, commissioning and certification.	Service Provider of the SPV and MoH (as necessary) Gaziantep IHC SPV	Prior to operation	Life and Fire Safety Master Plan. Systems testing report. Certification documents.
PR2: Labour and Working Conditions						
2.1	Human Resources	EBRD PR2, IFC PS2 EIB Standard 8 Best practice	Update existing HR policy in line with Lender requirements and standards and ensure all workers are aware of its content. Update HR Management Plan and appoint a HR Manager for the	Service Provider of the Gaziantep IHC SPV Gaziantep IHC SPV	Prior to operation phase	HR Policy. HR Management Plan. Employee / worker contracts.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			operational phase. Update employee/worker contracts setting out working conditions, terms of employment and EHS responsibilities. Insure all employee/workers under the Social Security Institution (SSI). Establish procedures to communicate and coordinate among employees of Gaziantep IHC, service providers and MoH. Confirm employees to be managed by the Gaziantep IHC service provider and MoH, clarifying recruitment of laboratory, imaging, sterilisation and disinfection personnel.	MoH as applicable		SSI records. Procedure for HR coordination between service provider and MoH.
2.2	Human Resources	EBRD PR2, IFC PS2 EIB Standard 8 Best practice	Implement the HR Management Plan. Issue contracts to employees/workers upon recruitment covering all relevant labour requirements of Lenders. Keep files of all employees / workers that include their work contracts, training records, medical surveillance records, next of kin details and similar. Develop a database of employees / workers and subcontractors that includes information on age, social security number, identity card	Service Provider of the Gaziantep IHC SPV Gaziantep IHC SPV MoH as applicable	During construction	Personnel files. Database of employees / workers. Brief quarterly reports available for review by external monitors.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			number, gender, ethnicity, nationality, etc. Payroll checks by operation service provider against issues such as sub-contractor wage rates, payment of benefits and timely payments.			
2.3	Occupational Health and Safety	EBRD PR2, IFC PS2, IFC EHS Guidelines for Healthcare Facilities EIB Standard 9 National legislation	Develop an OHS Management Plan to identify health and safety risk of each activity during operation followed by identification of appropriate mitigation measures. Provision of Personal Protective Equipment. Provide safety and induction training to employees / workers. Provide first aid training to relevant workers as required by national legislation.	Service Provider of the Gaziantep IHC SPV Gaziantep IHC SPV	Prior to operation	Occupational Health and Safety Management Plan. Training records.
2.4	Occupational Health and Safety	EBRD PR2, IFC PS2, IFC EHS Guidelines for Healthcare Facilities EIB Standard 9 National legislation	Implement OHS Management Plan in accordance with Lender requirements and national legislation. Develop a method statement for each work activity for operation. Provide necessary training to all employees / workers. Record all accidents and incidents. Comply with health and safety	Service Provider of the Gaziantep IHC SPV	During operation	Occupational Health and Safety Plan. Method statements. Records of audit reports, regular inspections, trainings for employees/workers. Accidents and incidents logs and records of corrective action.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			legislation applicable to the operation phase of the Project.			
2.5	Grievance Mechanism	EBRD PR2, IFC PS2, EIB Standard 8	Update the grievance mechanism for employees / workers. Publicise the grievance mechanism to personnel / workers on notice boards. Implement grievance mechanism. Respond to grievances in a timely manner and undertake necessary corrective actions.	Service Provider of the Gaziantep IHC SPV Gaziantep IHC SPV	Prior to operation phase During operation phase	Grievance mechanism in place. Grievance log including records of grievances, response to grievances and corrective actions. The grievance log must include the person responsible for addressing the grievances.
2.6	Subcontractors	EBRD PR2, IFC PS2 EIB Standard 8	Prepare a Subcontractor Management and Monitoring Plan. Prepare a subcontractor list to be consented by the MoH. Require all subcontractors to adhere to Gaziantep IHC service provider OHS policies and plans, the ESMMP and ESAP through contract clauses. Require subcontractors to report accidents, incidents and safety non-compliance. Require subcontractors to maintain records of their employees' next of kin details. Ensure all subcontractors are informed of the grievance mechanism.	Service Provider of the Gaziantep IHC SPV Gaziantep IHC SPV	Prior to and during construction phase	Subcontractor Management and Monitoring Plan. Contracts with subcontractors. Records of subcontractor accidents and incidents. Subcontractor personnel files. Evidence of subcontractor staff receiving information on the grievance mechanism. Grievance log.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			Require subcontractors to manage their workers in line with HR Policy by including HR Policy in tender documentation and contractual agreements. Require subcontractors to adhere to the Project's grievance mechanism. Include pass/fail criteria for subcontractors based on their health and safety and HR performance record when reviewing bids. Carry out due diligence checks on subcontractors to verify they are reputable, legitimate enterprises. Carry out due diligence on subcontractors regarding life-threatening issues, use of child or forced labour and ensure they sign an anti-corruption and responsible procurement policy.			
2.7	Suppliers	EBRD PR2, IFC PS2, EIB Standard 7&8	Carry out due diligence checks on all major suppliers regarding life-threatening issues, use of child or forced labour and ensure they sign an anti-corruption and responsible procurement policy.	Service Provider of the Gaziantep IHC SPV Gaziantep IHC SPV	During operation phase	Due diligence check records.
2.8	Supply of Materials	EBRD PR1, PR2 IFC PS1, PS2 Best Practice	Supply materials as close as possible to the facility. Prepare a supplier list. Supply materials from	Service Provider of the Gaziantep IHC SPV Gaziantep IHC SPV	During operation phase	Records of supply sources. Supplier List. Licenses/certificates/permits of the suppliers.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			licensed/certified/permitted suppliers/facilities. Prefer to the extent possible recycled materials and materials certified as 'green' and low carbon. Integrate in OHS management plan procedures and mitigation measures to ensure that primary suppliers within the supply chain are taking steps to prevent or to correct life-threatening situations related to supply chain workers, and where remedy is not possible, the Project Company will shift the primary supply chain over time to suppliers that can demonstrate that they are complying with IFC PS2.			Procedures and mitigation measures document disclosed to related parties and annual monitoring report records.
PR3: Pollution Prevention						
3.1	Pollution Prevention	EBRD PR3 IFC PS3 EIB Standard 2 Best practice National legislation	Perform regular periodic integrity testing for hazardous material storage equipment. Adopt good operation practices for the protection of soil, surface water and groundwater (eg storage areas, spillage control, spill kits etc.). Keep spill response kits at designated areas with specific instructions for their use and train site staff on the use of spill kits. Implement following plans:	Service Provider of the Gaziantep IHC SPV Gaziantep IHC SPV	During operation phase	Records of periodical site inspections. Presence of spill response kits. Records of monitoring of the implementation of the relevant plans. Audit and control results, spillage incident records, measurement results, contaminated soil disposal records, training records and

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			- Hazardous Material Management Plan. - Emergency Preparedness and Response Plan. - Waste Management Plan. - Train personnel/workers/subcontractors. Develop EPRP to ensure mitigation of spills from hazardous materials during operation			similar. Records of regular integrity testing.
3.2	Hazardous Materials	EBRD PR3/PR4 IFC PS3/PS4 EIB Standard 2 Best Practice National legislation	Develop and implement Hazardous Material Management Plan. Prepare an inventory of hazardous materials. Obtain Material Safety Data Sheets (MSDSs) and provide in relevant locations in in both English and Turkish. Make Personal Protective Equipment (PPE) available for relevant personnel. Train relevant personnel. Take required onsite measures. Keep hazardous materials at designated areas. Locate suitable fire-fighting equipment close to hazardous material storage/usage areas.	Service Provider of the Gaziantep IHC SPV Gaziantep IHC SPV	Prior to/During operation phase	Records of audits. Hazardous material inventory. Site inspections. Incident records. Training records.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
3.3	Waste Management	EBRD PR3 IFC PS3 EIB Standard 2 National legislation	Develop and implement Waste Management Plan. Maintain and implement the HWMS in line with the waste management practices given in the IFC Guidelines for Health Care Facilities. Ask for an official letter from the municipality related to obtaining confirmation for the approval of disposal of medical wastes. Manage (collect, transport, dispose etc.) all wastes in line with the legal requirements. Record keeping about waste generation, storage and transportation to third party waste management facilities. Inform TAEK (Turkish Atomic Energy Authority) on the radioactive waste generation and identify radioactive waste management options prior to implement any practice with TAEK. Train relevant workers.	Service Provider of the Gaziantep IHC SPV Gaziantep IHC SPV	Prior to/During operation phase	Records of audits related to the implementation of the Waste Management Plan. Consents/permits from local authorities for the disposal of wastes. Licenses of transportation companies and disposal facilities. Waste transportation and disposal records (e.g. National Waste Transportation Form). Declaration records made to the MEUP. Periodical site inspections to ensure that site conditions/applications are adequate for appropriate waste management. Training records of staff.
3.4	Wastewater	EBRD PR3 IFC PS3 EIB Standard 2 National legislation	Discharge domestic wastewater to the municipality infrastructure in line with permits. Ensure that wastewater that is contaminated with radioactive	Service Provider of the Gaziantep IHC SPV Gaziantep IHC SPV	During operation phase	Check municipal sewer system connection certificate obtained from the relevant authority. Check effluent analysis

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			substances (ie from nuclear medicine department) will be collected separately and/or subject to neutralisation prior to being discharged into the sewer system. SPV to conduct effluent analysis based on the monitoring frequency and proposed limits provided by the Gaziantep Water and Sewage Administration. Separate collection of urine, faeces, blood, and vomit from patients treated with geno-toxic drugs to avoid their entry into the wastewater stream. Undertake necessary measures for liquid wastes contaminated with radioactive substances as per the Regulation on Wastes Generated upon Usage of Radioactive Substances (OG date/no: 02.09.2004/25571) related to discharging this type of wastewater into the sewer system. Ensure discharge of chemicals used in the laboratories and the effluents from laboratory equipment does not occur to sewer system and these are transferred to barrels via special collection systems that do not need manpower.			results to ensure they met discharge criteria.
3.5	Radioactive Substances	EBRD PR1/PR3 IFC PS1/PS3 EIB Standard 2	Manage radioactive substances in accordance with the national law and IFC EHS Guidelines for Health Care	Service Provider of the Gaziantep IHC SPV	Prior to/During operation	Radioactive Substance Management Plan.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
		National legislation International Atomic Energy Agency standards	Facilities. Develop and implement Radioactive Substance Management Plan.	Gaziantep IHC SPV	phase	
3.6	GHG Emissions	EBRD PR3, IFC PS3, EIB Standard 2 National legislation	Compile and issue annually an inventory of greenhouse gas emissions during the operation of the Project.	Service Provider of the Gaziantep IHC SPV Gaziantep IHC SPV	Within the first year of operation and annually	Annual performance reports.
3.7	Tri-generation and boiler emissions	EBRD PR3, IFC PS3, IFC EHS Guidelines EIB Standard 2 National legislation	Implement the Air Quality Management Plan and Health Campus Internal Traffic Management Plan. Undertake tri-generation and boiler emission monitoring on an annual basis in accordance with IFC EHS Guidelines: Air Emissions & Ambient Air Quality and national requirements.	Service Provider of the Gaziantep IHC SPV Gaziantep IHC SPV	During operation phase	Air quality monitoring reports. Audits of records relating to implementation of Management Plans
3.8	Environmental accidents / actions	EBRD PR3, IFC PS3 EIB Standard 2 National legislation Best practice	Keep records of all environmental accidents, spills and actions taken and alert Lenders as required.	Service Provider of the Gaziantep IHC SPV Gaziantep IHC SPV	During operation	Environmental accident and actions log.
PR4: Community Health, Safety and Security						
4.1	Community health and safety	EBRD PR 4, IFC PS4 EIB Standard 9	Develop a Community Health and Safety Management Plan. Develop an Emergency Preparedness and Response Plan with provisions for community health and safety. Develop a Healthcare Campus	Service Provider of the Gaziantep IHC SPV	Prior to Operation phase	Management Plans in place and reviewed by Lenders / LTA. Written records and photographic updates on the EPRP will be provided to the community and local

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			Internal Traffic Management Plan. Develop a Security Management Policy and Plan			authorities.
4.2	Community Health and Safety	EBRD PR 4, IFC PS4 EIB Standard 9	Implement relevant Community Health and Safety Management Plans. Update local authorities and communities if there are any changes to the Emergency Preparedness and Response Plan. Undertake regular drills/exercises of emergency measures. Ensure relevant employees/workers trained in measures to protect community health and safety.	Service Provider of the Gaziantep IHC SPV	During operation phase	Records of audits and regular inspections. Training records. Records of drills.
4.3	Community engagement	EBRD PR 4, PR10, IFC PS1, PS4 EIB Standard 9 & 10	Document discussions relating to any identified impacts, risks and mitigation measures with residents and TOBB 4 School during operation in an E&S Performance Annual Monitoring Report. Engage with TOBB High School and organise meetings with the School authorities and Parent-Teacher Association on the presence of the High Security Forensic Psychiatric Hospital in accordance with the provisions of the SEP.	Gaziantep IHC SPV	During operation phase	Records of meetings with residents and TOBB High School.
4.4	Security Management	EBRD PR 4, PR10, IFC PS1, PS4 EIB Standard 9 & 10	The SPV, together with the MoJ and MoH will develop a Security Policy and Plan for the IHC, which will detail the company's position and measures	Gaziantep IHC SPV is	Prior to and during operation phase	Security Policy and Plan in place. MoH and MoJ security arrangements are clearly

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			to address the use of force, training, equipping and monitoring security guards as well as investigating reports of unlawful behaviour and preventing recurrence. The Security Policy and Plan will be in line with Lender requirements. The security of the Forensic Hospital will be the joint responsibility of the MoJ and MoH. The SPV will seek details of the security arrangement and incorporate into their Security Policy and Plan for the IHC. Security personnel managed by the SPV will be vetted for past criminal offences, use of force and human rights violations. The SPV will ensure security contract firm recruits adequate, trained security staff who have not been involved in past security abuses.	responsible for general security. MoH and MoJ is responsible for security at the Forensic Hospital		incorporated into the Plan. Records and credentials of security personnel. Records will include written evidence of personnel vetting process. Training records of security personnel.
4.5	Infectious Disease Control	EBRD PR2, PR4, IFC PS2, PS4 EIB Standard 8&	Develop and implement an Exposure Control Plan for blood-borne pathogens and inform employees/workers/ visitors of infection control policies. Establish an Infection Control Committee. Set up a central log system of infection related incidents and accidents with	Service Provider of the Gaziantep IHC SPV MoH Gaziantep IHC SPV	Prior to and during operation phase	Records of audits for the implementation of plans for infection control. Immunisation records.

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			management oversight.			
PR10: Information Disclosure and Stakeholder Engagement						
10.1	Stakeholder Engagement Plan	EBRD PR1, PR10, IFC PS1 EIB Standard 10	Stakeholder Engagement Plan to be updated for operation phase as relevant. Ensure information is provided on notice boards in Turkish and Arabic on grievance / comments procedure with comments boxes distributed throughout the Hospital. Set up a Patient Advisory Liaison Service in accordance with the SEP. Set up a forum with TOBB High School for engagement with the school and PTA on issues of concern and the grievance procedure. Support Syrian refugee users of the Hospital through provision of notice boards with Arabic information, provide a hotline to the Danish Refugee Council (or similar body supporting refugees) and participate in the UNHCR Working Group on Health to ensure services provided to refugees is adequate.	Service Provider of the Gaziantep IHC SPV	During operation phase	Stakeholder Engagement Plan revised and reviewed. Community liaison officer contact details will be provided. Forums established. Notice boards installed with relevant information. Comments boxes installed.
10.2	Grievance mechanism	EBRD PR1, PR10, IFC PS1 EIB Standard 10	Implement grievance procedure for the Hospital. Respond to grievances in a timely manner. Undertake necessary corrective actions	Service Provider of the Gaziantep IHC SPV Gaziantep IHC SPV	During operation phase	Grievance log including records of grievances, responses to grievances and corrective actions. Grievance log shall include

No.	Subject	National Legislative Requirements/ Lenders Requirement/ Best Practice	Action	Responsible party	Timetable	Monitoring and evaluation criteria
			as needed. Document records of stakeholder consultation and information disclosure. Annual reporting to Lenders on the implementation of the ESMMP and ESAP as well as any new impacts/risks identified to affected communities through the Environmental and Social Performance Annual Monitoring Report.			the person in charge of addressing the grievance. Meetings of minutes. Annual reports.
10.3	Patient grievance	EBRD PR1, PR10, IFC PS1 EIB Standard 10	Implement a Patients' Grievance Mechanism for health services under the responsibility of the MoH. Implement a Patients' Grievance Mechanism for health services under the responsibility of the Gaziantep IHC SPV Service Provider. Establish Patient Advisory Liaison Service.	Responsibility will be shared between the MoH and Service Provider of the Gaziantep IHC SPV based on services provided	During operation phase	Grievance mechanisms in place. Patient Advisory Liaison Service in place.

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