
MERSİN INTEGRATED HEALTH CAMPUS PROJECT



ENVIROMENTAL AND SOCIAL ACTION PLAN (ESAP)

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MERSİN INTEGRATED HEALTH CAMPUS PROJECT

ESAP

(FINAL)

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ABBREVIATION LIST

ESIA	Environment and Social Impact Assessment
ESAP	Environmental and Social Action Plan
ESMMP	Environmental and Social Management and Monitoring Plan
FGD	Focus Group Discussion
IFC	International Finance Corporation
KII	Key Informant Interview
NGO	Non-Governmental Organization
PAA	Project Affected Area
PAP	Project Affected People
PR	Performance Requirements
PS	Performance Standards
PRO	Public Relations Officer
RAP	Resettlement Action Plan
SEP	Stakeholder Engagement Plan
SMP	Social Management Plan

1 INTRODUCTION

This document comprises the Environmental and Social Action Plan (ESAP) for the Mersin Integrated Health Campus Project (MIHCP). It summarizes the issues and actions related with the Project, provides national and international legal framework for these issues, describes completion indicator of issues, and provides timeframe for the implementation and represent responsibilities of all related parties of the Project.

In lifetime of the Project, action plans have essential importance to avoid potentially adverse effects - and maximize potential benefits - of the Project with respect to environmental, health and safety (H&S) and social aspects, and to operate in conformance with applicable laws and regulations of Turkey, as well as the policies of international financial organizations.

The specific items of ESAP are based on the Impact Assessment described in the main text of the Enviromental and Social Assessment (ESIA) report, plus the results of discussions with Stakeholders and Project Company and the Project Lenders.

The ESAP takes a long-term view of the entire life cycle of the Project and will continue to evolve in scope and depth within the three key stages of the project implementation:

- Pre-Investment;
- Construction; and
- Operation.

The plans detailed in the sections of ESAP regarding construction and operational phases are subject to further discussion and agreement with the Ministry of Health of Turkey. ESIA documentation including ESAP will be specifically reviewed for potential modifications if needed during the project implementation. Any subsequent changes are subject to Lenders' agreement.

2 PRE-INVESTMENT PHASE

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
PS 1 - Assessment and Management of Environmental and Social Risks and Impacts					
1.1	Developing Project Specific Environmental and Social Management System and EHS Training Programme	IFC PS1 & PS2 IFC EHS Guidelines	<p>Project specific environmental and social management system (ESMS) will be established. As part of it, the following site specific procedures/plans will be prepared:</p> <ul style="list-style-type: none"> • Emergency preparedness and response plan (Closed) • Hazardous material storage plan,(Closed) • Air Quality management plan (Closed), • Noise management plan (Closed), • Spill response plan, (Closed) • Archaeological chance find procedure (Closed) • Traffic management plan (Closed), • Waste management plan (Closed), • Occupational health and safety plan, (Closed) • Security plan (Closed), • Nomad Support Strategy (Closed) • Grievance Procedures (workers and community) (Closed) • Workers Camp Management Plan (Closed) <p>Organizational chart to be updated with Environmental, Health, and Safety (EHS) chief name, with defined roles and responsibilities (Closed).</p>	<p>Prior to financial close</p> <p>Implement ESMS /ESMMP throughout construction. For operation phase refer to Table 4.</p>	SPV/EPC Contractor

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
			Training programme for construction phase (Closed)		
1.2	Contractor Compliance - include clauses in contracts requiring compliance with Project HR Policy, ESMMP, ESAP, EHS and other Plans linked to ESMS	IFC PS1 & PS2	<p>Review of the updated contract requirements by the Lenders Technical Advisor (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 ESMMP and ESIA (Closed).</p> <p>Occupational Health and Safety Plan to be prepared in line with ESMMP by SPV and EPC contractor (Closed).</p>	Prior to financial closure.	SPV/EPC Contractor
1.3	<p>Conduct detailed traffic assessment study, including the followings, for the proposed Project:</p> <ul style="list-style-type: none"> - Traffic load for all sources shall be estimated. -More detailed assessment of the existing transportation infrastructure shall be included. - More detailed information about the Project Area and Urban Transportation System (i.e. public transportation) shall be considered. -Future plans of administration should be detailed considering the zoning plan. (if possible) shall be considered. -Proposed traffic plan (internal site 	IFC PS1 & PS4	<p>Mersin Metropolitan Municipality is responsible for the transportation master plans in the city centre. The existing master plan had been started to be revised in 2009 by the Bogazici University.</p> <p>Addendum to ESIA including revised traffic impact assessment of the Project during the operation phase. Publication of the addendum in the website of the Mersin IHCP (Closed).</p> <p>Revised Traffic Management Plan in accordance with completed Mersin Transportation Master Plan.</p>	<p>Prior to first drawdown for the addendum.</p> <p>Six months prior to operation for the Traffic Management Plan</p>	SPV

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	<p>plan) shall be included.</p> <p>Identify whether traffic impacts for Mersin will coincide or interact with traffic impacts for the nearby big housing complex projects.</p> <p>If so, develop Traffic Management Plan in collaboration with the Mersin Metropolitan Municipality in line with their master plan being revised considering the latest settlement developments in the area.</p>				
1.4	Develop Worker Code of Conduct to manage workers' behaviour on site, in camp and in communities.	IFC PS1	Worker Code of Conduct. (Closed)	Prior to financial closure.	SPV/EPC Contractor
1.5	Permits and licenses	IFC PS1 Turkish Environmental Legislation	Proof of documentation for: Outstanding permits Construction Permit Municipality permits	Prior to construction	SPV/EPC Contractor
1.6	Contractor Compliance	IFC PS1 & PS2	Review of the updated contract requirements by the Lender Technical Advisor (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 ESMMP and ESIA (Closed).	Prior to Financial Closure.	SPV / EPC Contractor/LTA
PS 2 - Labour and Working Condition					
2.1	Develop HR Policy for EPC in line with IFC PS2 for construction phase and	IFC PS2	Human Resources /Rights Policy submitted to TA (Closed)	Prior to financial closure.	SPV/EPC

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	<p>ensure all workers are aware of its content.</p> <p>State policy on child labour and forced labour, non-discrimination and equal opportunity in HR Policy in line with IFC PS2.</p> <p>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.</p>	Turkish Labour Law Article 5: The principle of equal treatment	Worker's Handbook submitted to TA (Closed)		
2.2	Develop worker contracts or an HR method statement describing that the job description for workers, employment requirements of Turkish Law will be obeyed and HR Policy and workers handbook will be the annex of the method statement.	IFC PS2 Turkish Labour Law Article 8: HR Policy, Types and Termination	Template worker contracts submitted to TA for review (Closed)	Prior to financial closure.	EPC and Service Integrator Company
2.3	<i>Produce a Workers' Accommodation Plan detailing how provisions will be made for compliance with 'Workers' accommodation: processes and standards, a guidance note by IFC (2009).</i>	IFC PS2 IFC Guidelines for Temporary Accommodation	Workers' Accommodation Plan (Closed).	Prior to financial closure.	SPV/EPC contractor
2.4	<p>Develop a worker grievance mechanism in line with IFC PS2.</p> <p>Commit to resolving grievances within specified timeframes.</p> <p>Commit to taking action to prevent recurrence of grievances where appropriate.</p>	IFC PS2	Documented worker grievance mechanism submitted to TA signed off by MMD (Closed)	Prior to financial closure	SPV/EPC and other subcontractors
2.5	Appoint Occupational Health & Safety Manager for construction with clearly	IFC PS2	Draft Policy for review (Closed)	Prior to financial close alternatively prior to first draw	SPV/ EPC and Service Integrator

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	<p>defined responsibilities for the construction in the Sponsor's company</p> <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.		down. OHS Centralised Reporting System has been prepared and implemented.	Company
2.6	Appointment of HR Manager for the Project for construction phase.	IFC PS2	HR Manager as a member of project staff and shown on organisation chart (Closed).	Prior to Construction	SPV/EPC contractor
2.7	Prepare and implement a construction phase site health and safety plan which informs all workers of the rules and specific measures to be implemented during construction work. The plan is to be communicated to all contractors and updated as necessary	EU Directive 92/57/EEC Turkish Occupational Health and Safety Law (#6331)	Copy of the construction phase site health and safety plan provided to Lender (Closed)	Prior to financial close.	SPV/ EPC Contractor
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 Turkish Occupational Health and Safety Law (#6331)	Copy of the construction phase site health and safety plan with clear requirements detailed within for working at heights during construction work. (Closed). (procedure available, training sticker system to be used)	Prior to first drawdown.	SPV/ EPC Contractor
PS 3 - Resource Efficiency and Pollution Prevention					
3.1	Compliance with national and international standards/ Project Company will ensure that the	IFC PS3 Good Practice Best Available Technique	Updated ESMS/ESMMP, site-specific sub-plans and monitoring records of compliance with ESMS/ESMMP throughout construction and operation (Closed for pre-	Throughout the project	SPV/EPC

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	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, minimize or control their release.	IFC EHS Guidelines National Environmental Legislation	investment stage)		
3.2	Waste/ Action: Confirm the municipality has the disposal area with sufficient capacity for the disposal of excavated soil	IFC PS3 Good Practice IFC EHS Guidelines	Capacities to be provided from the Municipality to SPV (Closed).	Prior to financial close.	SPV
3.3	Wastewater/ Action: Confirm the municipality's capacities to handle the wastewater from the Project Design the pretreatment plant to ensure compliance with national and EU requirements	IFC PS3 Good Practice IFC EHS Guidelines	Capacities and discharge standards of the treatment to be provided to Lender (to be included in the ESIA) (Closed)	Prior to financial close.	SPV
3.4	Medical Waste Confirm the capacity of the medical waste sterilization plant and demonstrate that it meets national/EU standards	Turkish law EU EIA Directives IFC EHS Guidelines for Health Care Facilities	Capacities and disposal criteria of the Plant to be confirmed by the Municipality (Closed). Environmental license of the sterilization plant to be checked (Closed).	Prior to financial close.	SPV

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
3.5	Assess the safety, noise and vibration impacts of the heliport. Ensure that heliport design confirms noise limit. Cooling fans to meet EU certification, tri-gen plan meets Turkish noise standards	IFC PS3 Good Practice IFC EHS Guidelines Turkish Law	Addendum to ESIA including impact assessment of the heliport. Publication of the addendum in the website of the Mersin IHCP (Closed). Documentation regarding cooling fans to be provided to Lender (Closed)	Prior to financial close.	SPV
3.6	Air emissions/ Trigeneration plant shall be designed to comply with the relevant national regulations and EU Directives	EU Directives Turkish law	Documentation to be provided to Lender (Closed)	Prior to financial close.	SPV
3.7	Indoor Noise Levels Evidence showing that the indoor noise levels during the operation will comply with the Turkish Regulation	Turkish Law	Assessment report to be submitted to LTA (Closed).	Prior to financial close.	SPV
PS 4 - Community Health, Safety, and Security					
4.1	Develop Emergency Preparedness and Response Plan (EPRP) for construction phase in collaboration with relevant local authorities.	IFC PS4	EPRP (Closed)	Prior to financial close.	SPV/EPC Contractor
4.2	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 construction phase.	IFC PS4	Security policy and plan (Closed).	Prior to financial close.	SPV/EPC

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
PS 5- Land Acquisition and Involuntary Resettlement					
5.1	<p>Review and assessment of future resettlement and economic displacement requirements and potential mitigation measures associated with the project.</p> <p>SPV to monitor the displacement process and develop the nomad support strategies to ensure that the adverse impact due to economic displacement are mitigated based on focus group consultation</p>	IFC PS5	<p>Report including nomad support strategies to be provided to the Lender (Closed)</p> <p>Document including engagement of the nomads and evaluation of the engagement with nomads (Closed)</p>	<p>Prior to Lender's Board discussion of the project</p> <p>(Prior to Financial Close)</p>	<p>Ministry of Culture, Ministry of Food, Agriculture and Livestock Toroslar Municipality SPV</p>
PS 8-Cultural Heritage					
8.1	Prepare chance find procedure	<p>IFC PS8</p> <p>National Regulation on Protection of Cultural and Natural Properties</p>	Chance find procedure to be integrated within ESMS (Closed).	Prior to financial close	SPV/EPC
PS1/PR10 -Information Disclosure and Stakeholder Engagement					
10.1	Documentation of all information disclosure to be kept on record	<p>Equator Principle 5</p> <p>IFC PS1</p>	<p>Document log (Closed)</p> <p>Appointment of specific manager for this task in the SPV (closed)</p>	Provided to Lender per request at any time	2U1K, SPV/EPC and Service Integrator Company
10.2	Implementation of Project Performance Grievance Mechanism	IFC PS1	<p>Grievance Log submitted to TA</p> <p>Records of correspondence</p>	Prior to financial closure	SPV

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
			Evidence of grievance mechanism contact details on leaflets, signage and other public material (Closed).		
10.3	NTS, SEP and ESAP to be disclosed and remain in the public domain for the lifetime of the Project.	IFC PS1	Evidence of disclosure and availability (web page etc)(Closed)	Prior to the start of the disclosure period and throughout the project time	SPV

3 CONSTRUCTION PHASE

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
PS 1 - Assessment and Management of Environmental and Social Risks and Impacts					
1.1	<p>Implement Project Specific Environmental and Social Management System and EHS Training Programme</p> <p>Initiate the discussions with the MoH about the process to apply the international hospital management benchmarks such as Joint Commission International (JCI) or certification or similar high quality rating by a third-party expert in the health care field.</p>	<p>IFC PS1 & PS2</p> <p>IFC EHS Guidelines</p>	<p>Project specific environmental and social management system (ESMS) will be established and implemented. As part of it, all plans/ procedures listed below will be implemented:</p> <ul style="list-style-type: none"> • Emergency preparedness and response plan, • Hazardous material storage plan, • Air Quality management plan, • Noise management plan, • Spill response plan, • Archaeological chance find procedure • Traffic management plan, • Waste management plan, • Occupational health and safety plan, • Security plan, • Nomad Support Strategy • Grievance Procedures (workers and community) • Workers Camp Management Plan <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>	<p>Implement ESMS throughout construction phase.</p> <p>Monthly reporting as required.</p> <p>1 June 2014 to appoint HSE and QA/QC manager.</p>	SPV/EPC Contractor

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
			<p>Discussion with the MoH about the process to apply international hospital management benchmark such as JCI. Such discussions need to be recorded. Not being compulsory, any international benchmark in terms of the hospital operation shall be the common the objective between the MoH and SPV/O & S contractor.</p> <p>Monthly ESMS reporting to Lender/Lender Technical Advisor showing compliance with the relevant IFC and implementation of the Plan.</p>		
1.2	ESMS/ESMMP Compliance/Internal reporting	IFC PS1	Monthly Progress Reporting to Lender	Throughout the construction phase	SPV/EPC Contractor
1.3	<p>Construction Methods/ Development of Method Statements</p> <p>The list of relevant construction activities will be mutually decided by Lender and the EPC contractor.</p>	IFC PS 1	<p>LTA to receive construction methods for construction activities having significant impacts on environment and health and safety issues.</p> <p>Development of method statements will act as key document to facilitate management and monitoring of construction stage environmental and social issues.</p> <p>Construction methods received by LTA, method statements in place in line with good practice to manage and monitor construction E&S issues</p>	Prior to each construction activity submittal of Method Statements to LTA	SPV/EPC contractor
PS 2 - Labour and Working Condition					
2.1	<p>Implement Health and Safety Plan for construction phase of the Project.</p> <p>i. Implement OHS plan based on risk analysis for the construction using international benchmark such as <u>IFC's Environmental, Health and Safety</u></p>	<p>IFC PS2</p> <p>EU OHS requirements</p> <p>IFC EHS Guidelines</p>	<p>Monthly ESMS reporting to Lender/Lender Technical Advisor showing compliance with the relevant IFC Guidance and implementation of the Plan.</p> <p>In accordance with the Monitoring Plan, Lender /Lender</p>	Commence upon the start of the earth work and implement throughout the construction.	OHS manager/ Project Manager of the Sponsor

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	<p><u>Guideline for Construction and Decommissioning</u> as well as comply with Turkish OHS law and req's</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 sign 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 Lender</p>	<p>IFC EHS Guidelines for health care facilities</p> <p>Turkish Occupational Health and Safety Law (#6331)</p>	<p>Technical Advisor specialist visit the construction site monthly.</p> <p>Report promptly any material OHS issues to Lender</p> <p>Provide information on OHS management in Lender Supervisor.</p>	Monthly reporting	
2.2	Ensure all workers are aware of content of workers agreements.	<p>IFC PS2</p> <p>Turkish Labour Law Article 5: The principle of equal treatment</p>	Signed workers agreement	Throughout the construction	EPC
2.3	Implement Worker Code of Conduct to manage workers' behaviour on site, in camp and in communities.	IFC PS1	Evidence of how Code of Conduct (DİA Altyapı Corporate Social Responsibility Policy) distributed to	Throughout the construction	SPV/EPC Contractor

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
			workers throughout construction phase. Workers report that they know about Code of Conduct in interviews throughout construction phase		
2.4	Review and assessment of the potential employment requirements in order to attract the necessary non-medical support staff to the new hospitals and subsequent procedures associated with the closure of existing hospital(s) in Mersin for the health campus Project. The review and assessment to include the example of the closure of the existing hospital on the project territory.	IFC PS2 Turkish Labour Law Article 29: Collective Dismissal	The report will be submitted to Lender in form and the report will be reviewed by LTA.	Prior to operation phase (six months before)	SPV
2.5	Worker Protection (i) Comply with national labour law (ii) Ensure individual and labour contract in line with PS2 (iii) Ensure migrant and/or immigrant construction workers' human right to be fully respected (iv) If temporary accommodation is to be provided, it needs to comply with <u>IFC Guidelines for Temporary Accommodation</u>	Turkish labour law Article-5 : The principle of equal treatment IFC PS2	Monitoring Plan, Lender specialist visit the site Provide information on OHS management and how many grievances were received and from whom, how many were resolved and how in the Lender Supervisor. Template of workers agreement submitted to TA. Report on the implementation of the Workers' Accommodation Plan throughout construction	Prior to construction works start and implement throughout the construction. Monthly reporting	SPV/EPC Contractor
2.7	Based on the review and assessment develop together with MoH a retrenchment plan as needed. (to be discussed during the workshop in Mersin)	IFC PS2 Turkish Labour Law Article-29: Collective dismissal:	As needed, develop retrenchment plan subject to Lender's approval.	Prior to closure of the existing hospital/hospitals in Mersin.	SPV and MoH

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
2.8	Payroll checks by EPC contractor against issues such as sub-contractor wage rates, payment of benefits and timely payments.	IFC PS2 Turkish Labour law Article-61: Social insurance contributions	Short quarterly reports available for review by external monitors. (More frequent if necessary).	At commencement of construction and maintain regularly throughout Project.	SPV/EPC contractor
2.9	HR Policy to all workers covering all the requirements of national labour legislation and IFC PS2.	IFC PS2 Turkish Labour Law Article-8: HR Policy,	Workers state that they have seen policy when interviewed. Inclusion of summary of HR Policy and Worker's Handbook in induction training given to all staff. HR Policy displayed on selected notice boards around site.	Closed. To be implemented throughout the construction.	SPV/EPC contractor
2.10	Develop method statements for each work activity for construction. 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. EPC/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. Young people are not to be employed in hazardous work.	IFC PS2 EU OHS requirements IFC General EHS Guidelines IFC EHS Guidelines for health care facilities Turkish Occupational Health and Safety Law (#6331)	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.	Maintain throughout the construction activities.	SPV/EPC contractor
2.11	Require sub-contractors to adhere to EPC contractors' OHS policies and plans through contract clauses. Require sub-contractors to report accidents, incidents and safety non-compliances.	IFC PS2 Turkish Occupational Health and Safety Law (#6331)	Contracts; Sub-contractor accidents, incidents and non-compliances kept on record; and Sub-contractor personnel files.	Maintain throughout the construction activities	SPV/EPC contractor

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	Require sub-contractors to maintain records of their employee's next of kin contact details.				
2.12	Prepare a health and safety file which should contain project health and safety information which needs to be taken into account during the future maintenance and operation.	EU Directive 92/57/EEC Turkish Occupational Health and Safety Law (#6331)	Copy of the handover certificate from the EPC to the Project Co. Initiate discussion with the MoH as how to co-ordinate with MoH for integrated health and safety policies and procedures for the operational stage.	On completion of construction work	SPV/EPC Contractor
2.13	Ensure all workers are informed of the grievance mechanism and that it is easily accessible to them. Commit to resolving grievances within specified timeframes in the ESIA Report. Commit to taking action to prevent recurrence of grievances where appropriate.	IFC PS2 Article-5 : The principle of equal treatment	Maintain records of grievances and how they are closed out; and Evidence of how workers are informed of grievance mechanism.	Throughout the construction	SPV/EPC contractor
2.14	Require sub-contractors to manage their workers in line with the HR Policy by including HR Policy in tender documentation and contractual agreements.	IFC PS2	Tender documents and contracts.	Throughout construction.	SPV/EPC contractor
2.15	Include pass/fail factor for contractors based on their health and safety performance when reviewing bids. Carry out checks on sub-contractors to verify they are reputable and legitimate enterprises prior to entering into contracts and document this process.	IFC PS2 Turkish Occupational Health and Safety Law (#6331)	Records showing process and results of sub-contractor reviews.	Prior to signing contracts with sub-contractors. Procurement procedure will contain HSE policy all suppliers are complying with HSE standards.	SPV/EPC contractor
2.16	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	IFC PS2	Records showing process and results of supplier reviews; and Inclusion of process to be undertaken into existing 'Supply Chain Management System' documentation for	Prior to procurement from major suppliers.	SPV/EPC contractor

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	IFC PS2. All contractors will sign an anti-corruption and responsible procurement policy.		the Project. Signed statements from contractors		
2.17	Maintain database of employees and sub-contractor employees showing age of employees, social security number, identity card number, gender, nationality and home town.	IFC PS2 Turkish Labour Law Article-75 Personnel file of the employee	Database available for review by external monitors.	Throughout the Project.	SPV/EPC contractor
2.18	Conduct third party audit for assessment of compliance of the site with the IFC PS2	IFC PS2	A third party audit report	During the construction (frequency to be decided by Lender)	SPV
PS 3 - Resource Efficiency and Pollution Prevention					
3.1	Noise Monitoring/ <ul style="list-style-type: none"> undertake quarterly noise reporting (at sensitive receptor) during construction if night time working proposed, then obtain permit from the Local Environmental Committee and Develop Noise Management plan as part of ESMMP 	EU Directive 2002/49EC Turkish Regulation on Assessment and Management of Environmental Noise Good Practice IFC PS 3 IFC EHS Guidelines	Monthly ESMS reporting by Project Company showing compliance with the relevant IFC and EU Guidance. <ul style="list-style-type: none"> Quarterly noise monitoring reports night-time noise assessment (if required) Noise management plan in place 	Monthly reporting During the construction	SPV/EPC contractor
3.2	Water/Wastewater Monitoring/ Project Company to monitor and report monthly to the LTA showing compliance with the relevant IFC and EU Guidance.	EU Directive 91/271/EEC IFC PS3 Good Practice IFC EHS Guidelines	Site observation during LTA construction monitoring to assess compliance with IFC/EU guidance. Monthly ESMS reporting by Project Company to the LTA showing compliance with the relevant IFC and EU Guidance <ul style="list-style-type: none"> No wastewater discharges to the receiving 	Monthly Reporting During the construction	SPV/EPC Contractor

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
		Turkish Groundwater Law No. 167 Turkish Water Pollution Control Regulation	environment <ul style="list-style-type: none"> 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 refueling location Provide training to drivers and equipment operators in proper fuel management. 		
3.3	Waste/ Construction Waste Management Plan to include: <ul style="list-style-type: none"> 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. 	EU Directive 2008/98EC IFC PS3 Good Practice IFC EHS Guidelines	Site observation during LTA construction monitoring to assess compliance with IFC guidance Monthly ESMS reporting by Project Company showing compliance with the relevant IFC Guidance. 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.	Monthly Reporting During the construction	SPV/EPC contractor
3.4	Air Quality/ <ul style="list-style-type: none"> Truck speed will be limited to 30 km/hour. Water spraying for unpaved roads will be undertaken Trucks will be covered when 	IFC PS3 Turkish Regulation on Industrial Air Pollution Control Turkish Regulation	Site observation during LTA construction monitoring to assess compliance with IFC/EU guidance Monthly ESMS reporting by Project Company showing compliance with the relevant IFC and EU Guidance. <ul style="list-style-type: none"> Quarterly dust monitoring reports 	Monthly reporting During the construction	SPV/EPC contractor

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	<p>transporting materials.</p> <ul style="list-style-type: none"> • 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 quarterly basis in relation to PM₁₀. 	<p>Control of Exhaust Gases EU Directive 96/62EC</p>			
3.5	<p>Hazardous Waste</p> <ul style="list-style-type: none"> • Hazardous waste will be collected separately at closed containers (where available) suitable for the chemical components of the waste. • These waste stored at separate places in the Hazardous Waste Temporary Storage Area to be 	<p>IFC PS3 EU Directive 2008/98EC Best Practice IFC EHS Guidelines</p>	<p>Site observation during LTA construction monitoring to assess compliance with IFC guidance</p> <p>National Waste Transfer Forms and quantity of the hazardous wastes at the site provided within the monthly ESMS reporting.</p> <p>Annual Waste Declaration Forms</p>	<p>Monthly reporting</p> <p>During the construction</p>	SPV/EPC contractor

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	<p>established according to the current legislation.</p> <ul style="list-style-type: none"> 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. 				
3.6	<p>Hazardous Material Storage to be in compliance with IFC Guidance/ Project Company will prepare procedures for the storage of hazardous materials during the 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 will review and approve procedures for hazardous material storage.</p> <p>Project Company 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>	<p>IFC PS3 Good Practice IFC EHS Guidelines</p>	<p>Procedures for storage and use of hazardous materials as a part of ESMS. (Closed)</p>	<p>Develop prior to financial close 6 months prior to operation (for operation phase)</p>	<p>SPV/EPC</p>

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
PS 4 - Community Health, Safety, and Security					
4.1	<p>Implement community health and safety measures in construction 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.). 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 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>	<p>IFC PS4</p> <p>EU regulations</p> <p>International standards including WHO limits, IFC Environmental, Health and Safety General Guidelines and IFC EHS Guidelines for health care facilities;</p> <p>Turkish law</p>	<p>Site observation during LTA construction monitoring</p> <p>Record of any traffic incidents and complaints</p> <p>Monthly ESMS reporting with accident information</p> <p>Grievances received about access problems</p> <p>Vehicle maintenance checks regularly carried out and documented by an accredited service provider (follow routine maintenance schedule)</p>	Monthly reporting	SPV/EPC contractor

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
4.2	Develop Emergency Preparedness and Response Plan (EPRP) for operational phase in collaboration with relevant local authorities.	IFC PS4	EPRP	Prior to operational phase (six months before the operation)	SPV/EPC Contractor
4.3	<u>The Sponsor must hire an fire expert for the fire audit to ensure that offices, workers accomodation areas, warehouses and other buildings at the site satisfy the local Regulation on Protection of Buildings from Fire prior to use of these buildings.</u>	IFC PS4	A third part audit report / confirmation indicating compliance with the Regulation.	After the installation of each section of mobilization at the construction site during the construction period.	SPV/EPC Contractor
4.4	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 operational phase.	IFC PS4	Security policy and plan.	Prior to operational phase (six months before operation).	SPV/EPC and Service Integrator Company
4.5	Disclose EPRP to communities in line with IFC PS4. Update communities and local authorities if plans change. Carry out regular drills/exercises of emergency measures.	IFC PS4	EPRP Evidence of disclosure and updates (EPRP to be added at web page) Records of drills. Document drill practices reported in monthly progress reports	Prior to construction CP to first Draw Down On-going	EPC contractor
4.6	Document discussion of any identified impacts, risks and mitigations with communities during project preparation and at least annually thereafter.	IFC PS4	Records of meetings to be kept on file.	Continuously during construction	EPC Contractor
4.7	Implement a third party life and fire safety audit	IFC EHS Guideline NAFS	A third party audit report	Prior to Operation	SPV

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	<p>The Sponsor must hire an L & FS expert; 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>All provisions for access of disabled people are in place in compliance with international standards</p>				
PS 5- Land Acquisition and Involuntary Resettlement					
5.1	Based on the review and assessment (action 5.1 pre-investment phase), proposal of measures to meet any gaps in	IFC PS5	ESIA/ESMMP; and If necessary, develop Supplemental Resettlement Plan or Livelihood Restoration Framework in line with, IFC PS5	Prior to any further displacement for the Project.	SPV

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	the government managed resettlement process in line with clause IFC PS5 clauses 30-32as needed.		and subject to Lender's approval.		
PS 6- Biodiversity Conservation and Sustainable Management of Living Nature Resources					
6.1	Ecological monitoring	IFC PS6	Monitoring of birds movement and vegetation (i.e. endemic species) in April and October Monitoring of wild life in June (i.e. reproduction period of big mammals)	Within defined periods during construction	SPV
PS 8- Cultural Heritage					
8.1	Implement chance find procedures	IFC PS8 Turkish Regulation on Protection of Cultural and Natural Properties	Chance find procedure to be present in ESMS	Throughout the construction phase	EPC
PS1/ PR 10-Information Disclosure and Stakeholder Engagement					
10.1	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).	IFC PS1	Grievance Log Records of correspondence Evidence of grievance mechanism contact details on leaflets, signage and other public material.	Throughout the construction	SPV
10.2	Documentation of all consultation and information disclosure to be kept on record.	IFC PS1	Consultation activity log; and minutes of meetings.	Continuously	SPV

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
10.3	Annual reporting to the Lender on implementation of ESMS and any new impacts and risks identified to affected communities.	IFC PS1	Evidence of disclosure and availability (web page etc) Reports available to external monitors	Annually	SPV

4 HOSPITAL OPERATIONAL PHASE ¹

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
PS 1 - Environmental and Social Appraisal and Management					
1.1	Developing and Implement Project Specific Environmental and Social Management System and EHS Training Programme	IFC PS1 & PS2 IFC EHS Guidelines	<p>Project specific environmental and social management system (ESMS) will be established (The ESMS for the operation phase 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 system will include the following site specific procedures/plans:</p> <ul style="list-style-type: none"> • Medical Waste Management Plan (in the format requested by Ministry of Environment and Urbanization) • Emergency preparedness and response plan (including fire and life safety plan), • Waste Management Plan • Wastewater Management Plan • Hazardous material storage; • Air quality management plan; • Noise management plan; • Spill response plan; • Occupational health and safety plan, • Security plan, • Grievance Procedures (workers and community) 	<p>Six months prior to operation</p> <p>Implement ESMS throughout operation phase.</p> <p>Quarterly reporting</p>	SPV

¹ All actions stated here needs to be confirmed and finalized after having an official clarification meeting with the MoH

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
			<ul style="list-style-type: none"> Traffic management plan. <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> <p>Training plan</p> <p>Quarterly ESMS reporting to Lender/Lender Technical Advisor showing compliance with the relevant IFC/EU Guidance.</p>		
1.2	<p>All relevant commissioning tests have been carried out successfully.</p> <p>Obtain all necessary approval for the commencement of the Hospital</p> <p>Update all necessary permits on time</p>	IFC PS 1	Approval Documentation to be submitted to Lender	Once the Hospital becomes operational	SPV
1.3	Contractor Compliance - include clauses in contracts requiring compliance with Project HR Policy, ESMMP, ESAP, EHS and other Plans linked to ESMMP	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 ESMMP and ESIA	Prior to operation	Service Integrator Company
1.4	Sustainable Procurement	IFC PS1 & PS2	Project Company to adopt procedures for sustainable procurements and include environmental and social requirements for the provision of future services.	Prior to operation	Service Integrator Company

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
1.5	Life and Fire Safety	IFC PS2 IFC EHS Guidelines International best practice IFC PS4	As a follow up to the construction phase Life and Fire Safety audit, Service Integrator Company 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	Service Integrator Company
1.6	Project Agreement Schedule 14 Service Requirements/ Project Co to agree on P1 and P2 services with the MoH	IFC PS 3 IFC EHS Guidelines International best practice	These plans will be subject to further discussions/agreement with MoH and to be provided to the LTA for review.	Prior to operation	Service Integrator Company
1.7	Permits and licenses	IFC PS1 Turkish Environmental Legislation	Proof of documentation for: Environmental & Water Permits	During the commissioning and operation	SPV/Service Integrator Company
PS 2 - Labour and Working Condition					
2.1	Appointment of HR Manager for the Project for operational phase.	IFC PS2	HR Manager as a member of project staff and shown on organisation chart.	Prior to commencement of operation	Service Integrator Company
2.2	Develop worker contracts or an HR method statement describing that the job description for workers, employment requirements of Turkish Law will be obeyed and HR Policy and workers handbook will be the annex of the method statement.	IFC PS2 Turkish Labour Law Article 8: HR Policy, Types and Termination	Template worker contracts submitted to TA for review	Prior to commencement of operation	SPV and Service Integrator Company

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
2.3	Payroll checks by Service Integrator Company against issues such as sub-contractor wage rates, payment of benefits and timely payments.	IFC PS2 Turkish Labour Law Article-61; Social insurance contributions	Short quarterly reports available for review by external monitors. (More frequent if necessary).	At commencement of operation and maintain regularly throughout Project.	Service Integrator Company
24	HR Policy to all workers covering all the requirements of IFC PS2.	IFC PS2	HR Policy available for review. Workers state that they have seen policy when interviewed. Inclusion of summary of HR Policy and Worker's Handbook in induction training given to all staff. HR Policy displayed on selected notice boards around site.	Prior to commencement of operation and implement throughout the operation.	Service Integrator Company
2.2	Ensure all workers are aware of content of workers agreements.	IFC PS2 Turkish Labour Law Article 5: The principle of equal treatment	Signed workers agreement	Throughout the operation	Service Integrator Company
2.5	Assign OHS Manager and Revise Occupational Health and Safety Plan for operational phase.	IFC PS2 Turkish Occupational Health and Safety Law (#6331)	Assign OHS Manager in the O & C Company with clear responsibilities Revised plan. Report promptly any material OHS issues to Lender Quarterly ESMS reporting to Lender/Lender Technical Advisor showing compliance with the relevant IFC/EU Guidance.	Prior to commencement of operation and implement throughout the operation.	Service Integrator Company 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.	IFC PS2 EU OHS requirements; IFC General EHS Guidelines; IFC EHS Guidelines for health care facilities;	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.	Service Integrator Company

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	Maintain accident and incident logs. Service Integrator Company 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.	Turkish Occupational Health and Safety Law (#6331)			
2.7	Require sub-contractors to adhere to Service Integrator Company's OHS policies and plans through contract clauses. Require sub-contractors to report accidents, incidents and safety non-compliances. Require sub-contractors to maintain records of their employee's next of kin contact details.	IFC PS2 Turkish Occupational Health and Safety Law (#6331)	Contracts; Sub-contractor accidents, incidents and non-compliances kept on record; and Sub-contractor personnel files.	Start of operation.	Service Integrator Company
2.8	Ensure all workers are informed of the grievance mechanism and that it is easily accessible to them. Commit to resolving grievances within specified timeframes. Commit to taking action to prevent recurrence of grievances where appropriate.	IFC PS2 Turkish Labour Law Article-5: The principle of equal treatment	Maintain records of grievances and how they are closed out; and Evidence of how workers are informed of grievance mechanism.	Start of operation.	Service Integrator Company
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.	IFC PS2	Tender documents and contracts.	Throughout construction and operation	Service Integrator Company
2.10	Include pass/fail factor for contractors based on their health and safety performance when reviewing bids. Carry out checks on sub-contractors to	IFC PS2 Turkish Occupational Health and Safety Law	Records showing process and results of sub-contractor reviews.	Prior to signing contracts with sub-contractors.	Service Integrator Company

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	verify they are reputable and legitimate enterprises prior to entering into contracts and document this process.	(#6331)			
2.11	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 IFC PS2. All contractors will sign an anti-corruption and responsible procurement policy.	IFC PS2	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. Signed statements from contractors.	Prior to procurement from major suppliers.	Service Integrator Company
2.12	Maintain database of employees and sub-contractor employees showing age of employees, social security number, identity card number, gender, nationality and home town.	IFC PS2 Turkish Labour Law Article-75: Personnel file of the employee:	Database available for review by external monitors.	Throughout the Project.	Service Integrator Company
PS 3 - Pollution Prevention and Abatement					
3.1	Pollution Prevention/ Procedures and ESMMP to be updated to incorporate mitigation measures necessary to maintain compliance with the Lenders Environmental and Social Standards set out in the ESMMP and ESIA and IFC EHS Guidelines in relation to <ul style="list-style-type: none"> • Wastewater; • Air quality; • Noise; • Waste; 	IFC PS1 & PS 3 Best Practice	Project Company to establish or update the operational environmental management system to the equivalent standard of ISO14001. Project Company to assign Environmental Manager for the Operation with clear responsibilities Report promptly on any environmental material issues to Lender Quarterly ESMS reporting to Lender/Lender Technical Advisor showing compliance with the relevant IFC/EU Guidance. Site observation during LTA operation monitoring to assess compliance with IFC/EU guidance	Within a year of operation Quarterly reporting	SPV

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	<ul style="list-style-type: none"> Medical and Radioactive waste; Hazardous waste; and GHG emissions. 				
3.2	<p>Operation phase - Waste Management</p> <p>Ensure that there is a Waste Management Plan in compliance with 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 types of waste reduced at the source and 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>Annual visit to the final disposal area/company dealing with the final disposal</p>	<p>IFC PS1 & PS 3</p> <p>Best Practice</p>	<p>Site observation during LTA operation monitoring to assess compliance with IFC/EU guidance</p> <p>Quarterly ESMS reporting to Lender/Lender Technical Advisor showing compliance with the relevant IFC/EU Guidance and implementation of Medical Waste Management Plan.</p> <p>National Waste Transfer Forms</p> <p>Annual Waste Declaration Forms</p>	<p>During the operation.</p> <p>Quarterly Reporting</p>	<p>Service Integrator Company</p>
3.3	<p>Operation phase - Wastewater Management</p> <p>Ensure that laboratory wastewater undergoes pre-treatment before entering the municipal sewage system.</p>	<p>IFC PS1 & PS 3</p> <p>Best Practice</p>	<p>Quarterly ESMS reporting to Lender/Lender Technical Advisor showing compliance with the relevant IFC/EU Guidance.</p> <p>Compliance with the IFC and EU Guidelines wastewater disposal limits.</p>	<p>During the operation.</p> <p>Quarterly Reporting</p>	<p>Service Integrator Company</p>

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	<p>Ensure that the Chemo Therapy ward is equipped with the wastewater piping running on a separate line from general hospital wastewater.</p> <p>Ensure that areas utilizing radioactive materials i.e. toilets and sinks have been re-plumbed and directed into dedicated collection tanks.</p> <p>Prevent large quantities of pharmaceuticals, and all antibiotics and cytotoxic drugs from discharge to municipal sewer systems</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).	IFC PS1 & PS 3 Best Practice Turkish Law	Radioactive substance management plan to be provided	Prior to operation	Service Integrator Company
3.5	Hazardous Material Storage/ Project Company is to provide its hazardous materials register and methods	IFC PS3 Good Practice IFC EHS Guidelines	<p>Project Company 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.</p> <p>Quarterly ESMS reporting to Lender/Lender Technical Advisor showing compliance with the relevant IFC/EU Guidance.</p>	Prior to operation	Service Integrator Company
3.6	Trigeneration emissions/noise Project Company to monitor and report	IFC PS3 IFC EHS General	Trigeneration emission and noise monitoring to be undertaken in line with Regulation on Environmental	Defined time intervals in the permit	Service Integrator Company

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
		Guidelines Turkish Environmental Legislation	Permits. Frequency of the monitoring will be determined when the Environmental Permit procedure is started. Compliance with IFC and EU Guidelines air emission (at source). Air and noise monitoring report to be prepared in the scope of the Environmental Permit.		
3.7	Information regarding Wastewater Treatment Infrastructure and Medical Waste Incineration Plant / Sponsor to include information regarding these facilities into their wastewater and waste management plans	IFC PS3 IFC EHS General Guidelines	Wastewater Management Plan and Waste Management Plan to include this information	Prior to operation	Service Integrator Company
3.8	Record-keeping on environmental accidents and actions taken	IFC PS3	Log on environmental material issues and the way it is addressed.	Immediately after the commencement of the hospital	Service Integrator Company, Environmental/Technical Manager of the MoH
PS 4 - Community Health, Safety and Security					
4.1	Implement updated community health and safety measures in operational phase (e.g. EPRP, Child targeted traffic safety campaigns) Occupational health and safety management system to be updated for all staff with adequate training on exposure to vector-borne diseases. Update communities and local	IFC PS4 EU regulations International standards including WHO limits, IFC Environmental, Health and Safety General Guidelines and IFC EHS Guidelines for	Site observation during LTA operation monitoring Quarterly reports with accident information (0 accidents target) Grievances received about access problems (0 target)	Throughout the operation	Service Integrator Company

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	authorities if these plans change. Ensure emergency contact details are regularly updated.	health care facilities; Turkish law			
4.2	Document discussion of any identified impacts, risks and mitigations with communities as necessary during operation.	IFC PS4	Records of meetings to be kept on file.	Continuously during operation	Service Integrator Company
4.3	Background checks on all staff to be employed in serving the public to check for past abuses.	IFC PS4	Records of checks kept in individual's personnel files.	Prior to commencement of operation and during the every hire.	Service Integrator Company
4.4	Update security policy and plan.	IFC PS4	Updated security policy and plan.	Prior to commencement of operation.	Service Integrator Company
4.5	A management plan for security personnel will be developed and implemented by the Project Company outlining expectations around security, in line with international and Turkish law.	IFC PS4	Updated security policy and plan.	Prior to commencement of operation.	Service Integrator Company
4.6	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 Quarterly ESMS Report to Lender information on health and safety file updates	Continuously during operation	Service Integrator Company
4.7	The Sponsor must have regular maintenance and operational check of life and fire safety provisions during operational phase.	IFC PS4	Record of the checks and report in the Quarterly ESMS Report.	Periodically	Service Integrator Company
PS1/ PR 10–Information Disclosure and Stakeholder Engagement					
10.1	SEP to be updated when the Project moves into the operational phase including adequate venues, ways to	IFC PS1	Updated and disclosed SEP	Prior to operational phase	Service Integrator Company

No	Issue/Action	Legal Framework	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	communicate with the patient and public about the Service Integrator Company's operation of the hospital complex. A mechanism has to be implemented in between the SPV and the patient rights.				
10.2	Service Integrator Company implements 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 presentation slide, or on a grievance form).	IFC PS1	Grievance log; Correspondence with complainants; Evidence of grievance mechanism contact details on leaflets, signage and other public material.	Continuously during operation	Service Integrator Company
10.3	Documentation of all consultation and information disclosure to be kept on record.	Equator Principle 5 IFC PS1	Consultation activity log; and Minutes of meetings.	Continuously during operation	Service Integrator Company
10.4	Annual reporting on implementation of ESAP/ ESMS.	IFC PS1	Reports available to external monitors	Annually	Service Integrator Company