



Draft Report

Environmental and Social Management Plan

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ÇİMKO Operational Activities Project



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Abbreviations

Aol	Area of Influence
AIIB	Asian Infrastructure Investment Bank
BEKRA	Regulation of Reducing the Risks of Major Industrial Accidents
CSP	Community and Social Performance
DCC	Document Control Center or System
EIA	Environmental Impact Assessment
EHS	Environmental Health and Safety
EHSS	Environmental Health and Safety Solutions
ERP	Emergency Response Plan
ERT	Emergency Response Teams
E&S	Environmental and Social
ESHS	Environmental, Social and Health and Safety
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
GHG	Green House Gases
GIIP	Good International Industry Practice
GMP	Grievance Mechanism Procedure
HR	Human Resources
HS	Health and Safety
HSE	Health, Safety, and Environmental
IFC	International Finance Corporation
KPI	Key Performance Indicator
MGS	MGS Project Consultancy Engineering Trade Ltd. Co.
MoC	Management of Change
MOTAT	Mobile Waste Tracking System
MSDS	Material Safety Data Sheet
OG	Official Gazette
OHS	Occupational Health and Safety
OHSMP	Occupational Health and Safety Management Plan
PPE	Personal Protective Equipment
PS	Performance Standard
RDF	Refuse Derived Fuel
SEP	Stakeholder Engagement Plan
SoW	Scope of Work
SRS	Social Responsibility Staff
The Project	ÇİMKO Operational Activities Project
TKYB	Development and Investment Bank of Turkey
WMP	Waste Management Plan

1 INTRODUCTION

This Environmental and Social Management Plan ("ESMP") is prepared to complete the studies conducted to assess the Environmental and Social Impacts of the Project as per the national legislation, IFC Performance Standards ("PSs"), Development and Investment Bank of Turkey ("TKYB") Environmental and Social Policy and AIIB Environmental and Social Standards ("ESSs"). The reference number of this Plan is ÇİMKO-PLN-HSE-ESMP-001.

This Plan should be treated as a living document and relevant revisions and updates in case of the needs of Project and changes in the Project operations should be made.

1.1 Purpose

The purpose of this Environmental and Social Management Plan is to:

- ✓ Define the scope of the Management Plan and set out applicable management interfaces,
- ✓ Define roles and responsibilities,
- ✓ Outline the applicable national and international standards relevant to this Management Plan,
- ✓ Define commitments, operational procedures and guidance relevant to this Management Plan,
- ✓ Define monitoring and reporting procedures, including Key Performance Indicators,
- ✓ Define training requirements,
- ✓ Set out references for supporting materials and information.

1.2 Scope

This ESMP covers all Project activities during the operational phase. This ESMP is part of the overall suite of Management Plans developed for the Project and cross-linkages to the following management plans:

- ✓ Stakeholder Management Plan
- ✓ Grievance Redress Mechanism Procedure
- ✓ Occupational Health and Safety Management Plan
- ✓ Emergency Response Plan
- ✓ Air Quality Management Plan
- ✓ Greenhouse Emissions Management Plan

This Plan provides necessary means and measures to provide instructions and guidance to eliminate and control the risks and impacts that may arise from Project-related activities. This Plan will be updated, if required. The scope of the Plan includes following aspects:

- ✓ Project standards and requirements,
- ✓ Roles and responsibilities,
- ✓ Measures to be taken regarding environmental, OHS and social issues,
- ✓ Monitoring and reporting,
- ✓ Training of personnel regarding environmental and social management.

1.3 Background

ÇİMKO stepped into the cement sector with the privatization of Adiyaman Cement Factory in 1995. In addition, it expanded its production volume by establishing the Narlı Factory in 2007. ÇİMKO offers cement production, ready mixed concrete production and also thanks to Refuse Derived Fuel (RDF) usage license, provides waste recovery services. The Narlı Plant, built on an area of approximately 38.9 hectares, has a rotary kiln with a clinker production capacity of 10500 tons/day and cement packaging units with a production capacity of 400 tons/hour.

An Operational Activities Project will be prepared to be used in the Narlı Cement Factory in Kahramanmaraş Pazarcık district and Adiyaman Cement Factory in Adiyaman, operated by ÇİMKO A.Ş., and the deficiencies of these facilities will be eliminated. Within the scope of the project, it is planned to be used for the expenses of the business. There will be no construction work within the scope of the Project.

1.3.1 Area of Influence

The Area of Influence (AoI) could be disclosed since the project sites have Environmental Impact Assessment documents. There are no located industrial facilities, but residential areas, schools and health centers in the nearest villages are presence. The Project area is considered as an area of influence with a radius of 2.5 km, since similar studies will be carried out with the existing activities within the scope of the Project. Area of Influence; Access roads will be evaluated taking into account environmental and social impacts, including existing buildings and infrastructures. Figures 1-1 and 1-2 below show the locations and impact areas of the Project Area.

Table 1-1. The Settlements Considered in AoI

Project Area	Settlement	Distance to the License Area (m)	Direction
Adiyaman Cement Factory	Kayacık Neighborhood	1580	Northeast
	Yeniköy Neighborhood	1870	Northwest

	Börkenek Neighborhood	1360	South
Narlı Cement Factory	Akçakoyunlu Neighborhood	1970	Southeast

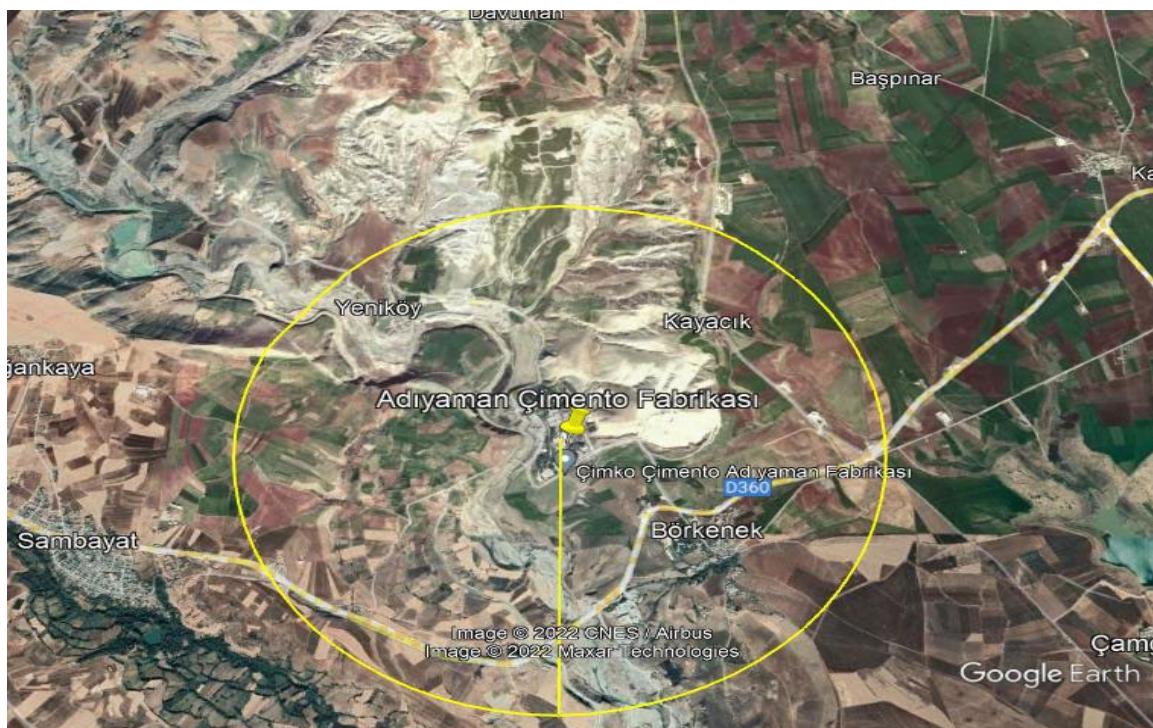


Figure 1-1. Area of Influence of Adiyaman Cement Factory

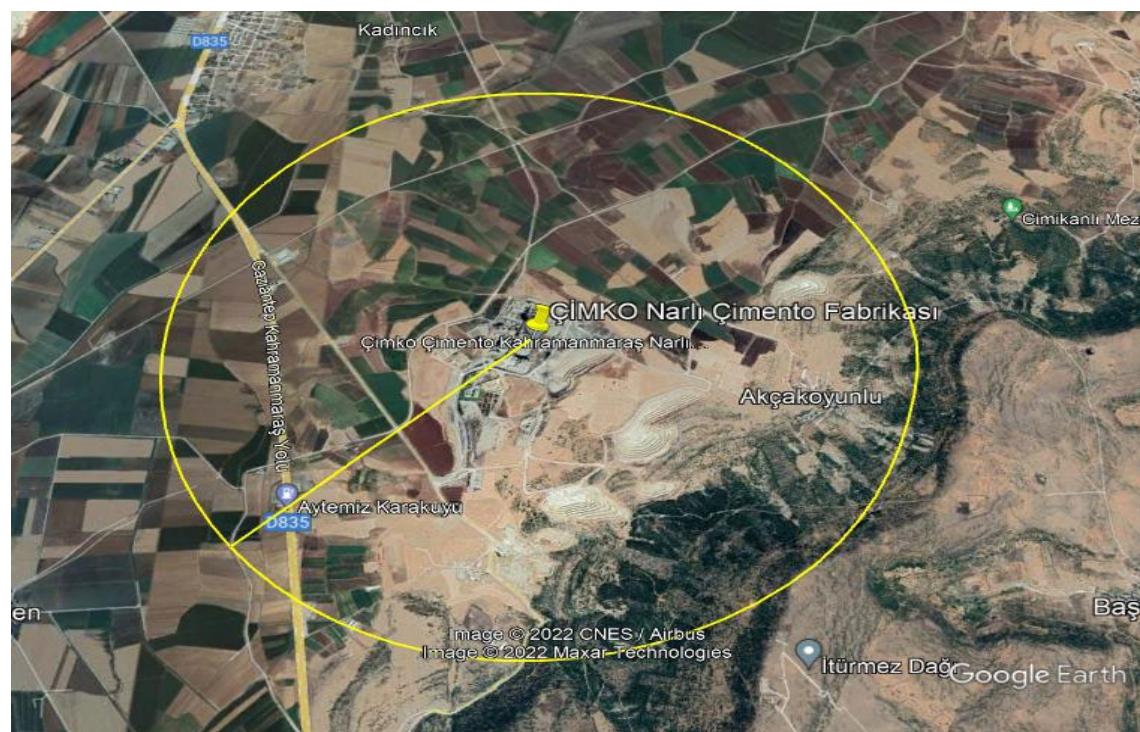


Figure 1-2. Area of Influence of Narlı Cement Factory

2 ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM

This section of ESMP, regarding with “Environmental and Social Management System” describes the organizational structure and general requirements and provides brief information (key aspects and monitoring/measurement and reporting requirements) regarding the ESMPs detailing all the requirements necessary to manage the environmental and social commitments as per all the relevant contractual documents.

The ESMS will cover management activities, provision of resources, project realization, measurement, analysis and improvement processes.

2.1 Environmental and Social Aspects

Project shall identify and assess environmental and social aspects and impacts of its activities and/or any other aspects that may raise due to any Management of Change (MoC) for its products and services in accordance with the project requirements.

Project shall pay particular attention to significant aspects while establishing, implementing and maintaining its Environmental and Social Management System.

The design controls safeguards, mitigation measures and monitoring activities that aim to avoid, prevent, minimize (or where this is not possible, offset) potential adverse environmental and social impacts, and enhance positive impacts, presented in this Management Plan.

2.2 Legal and Other Requirements

Project will be ensured the compliance against all legal requirements and Project Standards. A detailed summary of all legal requirements is outlined within the Section 4 of this Plan.

Changes in legal requirements released in official gazette will be followed by HSE Manager and necessary actions will be taken according to changes identified, including reissuing this ESMP or the other ESMPs.

2.3 Objectives, Targets and KPIs

The environmental and social objectives in relation to the Project are:

- Comply with all applicable Turkish laws and regulations,
- Meet the requirements of international standards and guidelines,
- Undertake the activities in a manner in which environmental and social impacts are avoided, if not possible minimized, managed and compensate enhances the reputation of the company,

- ✓ Avoid the impacts of the activities on the environment and communities, if not possible minimize and control the impacts of project activities on the environment and communities.

In order to meet the main objectives, relevant supporting objectives are:

- ✓ ZERO harm to environment, people and assets
- ✓ ZERO environmental release
- ✓ ZERO environmental violation
- ✓ ZERO reportable environmental and social incident
- ✓ No regulatory penalties or prosecution for environmental or social incidents
- ✓ Pro-active management of environmental and social performance
- ✓ Prevention/reduction of waste generation to the extent possible
- ✓ Proper waste identification, segregation, collection, storage, treatment and disposal
- ✓ Controlled/reduced gas and dust emissions
- ✓ Sustainable use/management of natural resources
- ✓ Maximized local employment opportunities
- ✓ Maximized local procurement opportunities
- ✓ Improved community safety practices
- ✓ Improved working conditions
- ✓ Support on medical care
- ✓ Optimized information sharing and consultation with the community
- ✓ 100% compliance with training/skill development programs' requirements
- ✓ 100% compliance with project requirements
- ✓ 100% compliance with applicable laws and regulations
- ✓ 100% compliance with relevant national and international standards
- ✓ 100% compliance with ethical procedures
- ✓ 100% transparency and fairness
- ✓ 100% controlled community relation activities
- ✓ 100% investigation and timely feedback of the complaints
- ✓ 100% respect to social and cultural sensitivities
- ✓ Preservation of cultural heritage
- ✓ Implementation of industry best practice
- ✓ Implementation of corporate social responsibility program
- ✓ Optimized social aids

“Environmental and Social Objectives” will be re-established/further detailed annually by the HSE Manager and Social Responsibility Staff, reviewed and approved by the Top Management.

ESMPs shall be established by the HSE Manager and Social Responsible Staff in coordination with the other Department Heads, reviewed and approved by the Top Management.

Progress against the established environmental and social key performance indicators (KPIs) will be reported in order to track performance. Environmental and social key performance indicators (KPIs) will be reported within monthly reports. KPIs table is given in Section 7 of this Report.

2.4 Organizational Roles and Responsibilities

Project shall ensure allocation of resources required to establish, implement, maintain and improve its Environmental and Social Management System.

Resources shall include human resources and required skills, organizational infrastructure, technology and financial resources.

Project’s Environmental and Social Organization Chart in accordance with this ESMP should be established including the assigned personnel and added into this management plan as an appendix. Moreover, the roles, responsibilities and authorities of those assigned personnel have been described in Section 3 of this ESMP in order to facilitate effective environmental and social management.

2.5 Training, Awareness and Competence

Project shall ensure that all the employees (including contractors, subcontractors and suppliers) are competent on the basis of appropriate education, training and/or experience.

In order to develop and maintain skills and competencies of the employees and to raise awareness on requirements and measures in order to avoid relevant adverse impacts on the environment and the community, training programs shall be implemented as per a Training Plan to be prepared annually.

Environmental and social training topics shall include, but shall not be limited to, the following:

- ✓ Environmental and Social Induction,
- ✓ Periodical Environmental and Social Trainings,
- ✓ Occupational Health and Safety basic and necessary technical trainings,
- ✓ Toolbox Talks,
- ✓ Refreshment Trainings.

Project shall develop and implement training, awareness and competence improving activities which are necessary for the implementation of the E&S project requirements and also continual improvement of ESMP of the Project. This will include:

- ✓ Identification of training needs,
- ✓ Appropriate training for those whose work may create an impact on the implementation of environmental and social management plan
- ✓ Recurrence of E&S trainings will be executed according to needs and mis-implementation.

Project company including Project contractors and subcontractors will be aware of and apply the following ESMP components:

- ✓ Requirements of ESMP,
- ✓ Significant environmental and social aspects,
- ✓ Benefits of improved personal performance,
- ✓ Competency evaluation for employees performing tasks which can cause an impact on the environment and social management plan

An environmental and social induction and awareness trainings will be provided to all personnel. Key project personnel whose management roles or job responsibilities/activities may have an impact on the environment will also receive specific issue training as appropriate (e.g. in waste and water management, spill response etc.)

Environmental and social training and toolbox talks will be provided regularly.

Project will supply following trainings but not limited to:

- ✓ Prevention of pollution (spills (spill kits and disposal methods), soils, solid wastes, water and etc.), waste management, environmental awareness.
- ✓ All drivers will take safety and E&S awareness training; driving performance will be reviewed and monitored.
- ✓ Wildlife sensitivity to disturbance will be included in workforce training.
- ✓ Driver training will include advice on behaviors to reduce the potential for disturbance, including use of horn, loud radios with windows open, switching engines off when not in use, strictly observing speed limits and not acceleration or braking aggressively on the routes.
- ✓ Issues relating to archaeological/cultural heritage awareness (such as ownership of finds, notification of finds and protection of archaeological sites) will be included in induction training.

- ✓ Environmental and social issues will be included in workforce and visitor induction training.
- ✓ When appropriate, on-the-job training will be provided to enable local employees gain new and/or improved skills while working on the Project.
- ✓ The workforce training program will include refresher and induction training to with the aim of ensuring that all recruits have the necessary understanding and knowledge levels for each job.
- ✓ The workforce training will include advice on minimizing energy consumption.
- ✓ Information will be incorporated into the site induction process and will outline the role of staff in the management of waste and emissions from site and spill response procedures.
- ✓ The briefings will include instructions regarding worker behaviors in the event that wildlife species are encountered.
- ✓ The workers will be trained about not harassing or feeding wildlife on the Project site or in associated areas.

2.6 Operational Controls

Operational controls are specific operations for controlling and managing the activities associated with E&S aspects. The implementation of the activities associated with environmental and social impacts will be accomplished through establishment and maintenance of operational procedures and controls including the following:

- ✓ Operations and activities
- ✓ Significant environmental aspects
- ✓ Operating criteria
- ✓ People and responsibilities
- ✓ Communication.

Operational controls shall be ensured in accordance with Project's ESMPs. Additionally, required site-specific ESMPs and/or method statements can be developed and implemented in line with operation program.

All the monitoring and measurement activities shall be performed, recorded and reported as per the Environmental and Social Management Plans.

These plans/method statements shall be strictly adhered to as part of the Environmental and Social Management System in order to reduce all the negative environmental and social impacts to an "As Low as Reasonably Practicable" level and achieve environmental and social objectives of the Project.

2.7 Documents and Record Keeping

The aim of document control is to ensure that all documents relevant to this ESMP are created, tracked, stored reviewed and maintained in compliance with the requirements of the Project, ISO 14001 and approved Project procedures.

The core documentation consists of ESMPs, procedures and relevant forms. Documentation of the Project will be managed in accordance with "Document Control Center (DCC)" plans and procedures of the Project, which will ensure that the documentation is:

- ✓ Located
- ✓ Reviewed, updated and approved
- ✓ In use with current versions
- ✓ Removed when it is obsolete and kept only for information or legally required
- ✓ Legible and dated
- ✓ Assigned retention periods.

All documentation related to environmental and social management system/plan will be up-to-date so that Project activities are conducted in compliance with current environmental and social requirements, policies objectives and targets. The final status of E&S documents is registered and followed in DCC.

E&S teams of the Project will review ESMP's procedures and forms to ensure that they remain updated and effective.

All management will be responsible for ensuring compliance to the environmental and social guidelines and procedures and applicable legislation, relevant to their business activity.

Document Control Center will be responsible for recording and controlling of documents in line with Project Standards.

Effective identification, control, categorization, storage and disposal of records are essential to the successful implementation of the ESMS and ESMPs.

Moreover, environmental and social records will include but not limited to:

- ✓ Information on applicable environmental and social legislation, guidelines and other requirements,
- ✓ Environmental and social objectives and targets,
- ✓ Complaint and consultation records,
- ✓ Training records,
- ✓ Incident/Accident reports,
- ✓ Non-conformance reports,

- ✓ Monthly reports,
- ✓ Information on significant environmental and social aspects,
- ✓ Audit reports,
- ✓ KPIs,
- ✓ Internal and external communication,
- ✓ Management Review records,
- ✓ Investigation Reports,
- ✓ Corrective action reports,
- ✓ Waste and other environmental and social required register records.

2.8 Monitoring

The objective of the monitoring and measurement activities is to determine the success of ESMP and to ensure a strategy of continual improvement in environmental and social performance is maintained and also to demonstrate how the requirements are being complied with.

Project will measure performance against the environmental and social Key Performance Indicators (KPIs) and document them on a monthly basis. The categories for which environmental and social performances can be followed include:

- ✓ Waste Management
- ✓ Spills
- ✓ Procurement/resource sustainability
- ✓ Environmental and social awareness training
- ✓ Vehicle emissions
- ✓ Dust emissions
- ✓ Water quality
- ✓ Wastewater discharge
- ✓ Noise
- ✓ Air emissions
- ✓ Stakeholder engagement
- ✓ Internal and external grievance management
- ✓ Community health and safety
- ✓ Local employment
- ✓ Local procurement
- ✓ Labor rights and working conditions
- ✓ Land entry and exits

Project's Social Responsibility Staff will maintain dialogue with affected communities and will record all the consultations in a written form as given in Project SEP.

Project will implement a Grievance Mechanism Procedure and will submit an environmental and social report each month that will include the following topics:

- ✓ The status of all non-conformances with the ESMP,
- ✓ Summary of all Environmental and Social issues related incidents/accidents,
- ✓ Summary of all Environmental and Social Regulatory and Legal Issues,
- ✓ Updated register of all sampling and analysis of discharge and emissions,
- ✓ Updated register of all waste volumes generated, recycled and disposed,
- ✓ Qualitative summary against each Management Plan,
- ✓ Quantitative evaluation against KPIs,
- ✓ Water quality and abstraction and consumption,
- ✓ Aggregate consumption,
- ✓ Chance finds summary, (if any)
- ✓ Employment summary,
- ✓ Training summary,
- ✓ Key engagement activities summary,
- ✓ The nature and status of any complaints received,
- ✓ Summary of community feedback,
- ✓ Issues for resolution,
- ✓ Community health and safety concerns,
- ✓ Social conflicts and unrest,
- ✓ Groundwater issues,
- ✓ Permits and license,
- ✓ Air and noise/vibration information and measurement results, (if necessary)

2.9 Management Review

Through the management review process, the management analyses data will be gathered during various assessment activities and key improvement opportunities will be identified.

HSE Manager will review the performance of environmental and social management plan through monthly reports.

The continuing applicability and effectiveness of the ESMP will be reviewed from time to time by HSE Manager and SRS. Top management, on the other hand, will review the ESMP on annual base to ensure it continuing in terms of suitability, adequacy and effectiveness.

This review will be done through management review meetings that will be held on minimum once in a year. It will be address possible changes to policy, objectives and other elements of the ESMP.

The management review of this ESMS will be carried out by Project Management including at a minimum HSE Manager, Top Management and SRS of the Project.

Management reviews will include

- ✓ Findings of incident investigations,
- ✓ Review of KPIs,
- ✓ Review of audit results,
- ✓ Compliance with legal requirements,
- ✓ Compliance with Project commitments,
- ✓ Review of non-conformances and corrective actions,
- ✓ Grievance and complaint records,
- ✓ Stakeholder engagement records,
- ✓ Training records,
- ✓ Changing Project conditions that may prompt change management,
- ✓ Follow up actions from prior management reviews and
- ✓ Reports on emergency preparedness and response.

3 KEY ROLES AND RESPONSIBILITIES

Key roles and responsibilities relevant for the implementation of this plan are outlined in this section. Key roles and responsibilities of the employees are given specific to each topic defined in the scope of this plan.

3.1 Biodiversity Management

Table 3-1. Roles and Responsibilities in Biodiversity Management

Roles	Description and Responsibilities
Top Management	<ul style="list-style-type: none"> • Responsible for ensuring the smooth functioning of this ESMP, • Determines policies and targets, • Evaluates the reports provided by the Operational Manager and ensures necessary actions were taken.
Operational Manager	<ul style="list-style-type: none"> • Provides coordination among the parties in order to facilitate the implementation of this Plan, • Provides the necessary resources for proper implementation. • Reports the system performance to the Top Management.
HSE Manager	<ul style="list-style-type: none"> • Implements this ESMP, • Determines the national and international legislations that are applicable to the Project activities and informs the Operational Manager and Top Management, • Makes periodic inspections of the ESHS performances of Contractors/Subcontractors,

Roles	Description and Responsibilities
	<ul style="list-style-type: none"> • Works in cooperation with other departments to determine targets for ESHS and resource efficiency issues, • Determines the environmental impacts in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances, • Determines and provides the necessary ESHS training materials for all employees, • Provides answers to the environmental grievances raised by employees, local community and local institutions, • Helps SRS for keeping the record of the complaints/suggestions in the Grievance Database with the details, • Supports SRS on the first evaluation of the relevance of grievances collected, • Supports SRS for recording all formal and informal engagement activities, • Conducts internal audits / site audits and determines corrective measures, if necessary.
Social Responsibility Staff (SRS)	<ul style="list-style-type: none"> • Keeps the records of the complaints/request/suggestions in the Grievance Database in detail (by whom, date, status, etc.), • Provides regular reporting back to the community related to community complaints, • Keeps the records of all formal and informal engagement activities conducted with the local community and other stakeholders, • Monitors and records the social responsibility activities carried out in the scope of the Project.
Document Control Center (DCC) Staff	<ul style="list-style-type: none"> • Knows the roles and responsibilities in all Project documents, • Uploads all management plans, policies, training minutes, environmental, social and HS records, and reports to DCC and keeping this system up to date, • Records and keeping up to date all permits and/or the results of measurements taken within the scope of the Project, • Makes documents accessible to all Project employees (including Contractors / Subcontractors' employees).
Biodiversity Advisor (Experts on Ecology – Flora and Fauna) (When required)	<ul style="list-style-type: none"> • Supports the HSE Manager in the strategic decisions related to the Biodiversity Management where needed, • Works in coordination with HSE Manager, • Conducts independent monitoring to ensure compliance and reporting the results when required.
Contractors / Subcontractors Employees	<ul style="list-style-type: none"> • Responsible for acting according to this plan, fulfilling the requirements and determining the processes that require improvement, • Complies with the provisions of this ESMP and other relevant management plans, • Completes all necessary ESHS trainings.

3.2 Stakeholder Engagement

Table 3-2. Roles and Responsibilities in Stakeholder Engagement

Roles	Responsibilities
Top Management	<ul style="list-style-type: none"> • Approval of this Plan and resources required for implementation, • Determines the policies and targets regarding the social communication and stakeholder engagement, • Determines the social budget of the Project. • Makes the final decision concerning internal and external grievances (if needed) in the light of the assessments of the Social Responsibility Staff (SRS) and HSE Manager, • Determines the social budget of the Project.

Roles	Responsibilities
Operational Manager	<ul style="list-style-type: none"> Has the overall responsibility for the implementation of the SEP by fulfilling project requirements, Ensures this plan is implemented during the lifetime of the Project, Ensures the facility's compliance with the Project Standards, and other requirements set out in this Plan, Determines necessary resources for the proper implementation of the SEP and reporting it to the Top Management for procurement, Ensures implementation of the commitments in the Plan.
Social Responsibility Staff (SRS)	<ul style="list-style-type: none"> Implements the SEP and GMP, Coordinates among the parties for proper implementation of this Plan, Reports to the Top Management about the system performance, Ensures national and international legislations/guidelines which are applicable to the Project activities are identified and tracked, Records all formal and informal engagement activities with local communities in Stakeholder Management System, Keeps records of the types of leaflets, brochures, newsletters prepared and distributed, by location and inserting this detail into stakeholder engagement quarterly reports, Monitors and records the social responsibility activities carried out in the scope of the Project and inserting those details into stakeholder engagement quarterly reports, Forms relationships with the Project stakeholders, Organizes stakeholder meetings to collect the responses to grievances actively as required, Provides regular reporting back to the community on the management related to community grievances, Determines and provides the necessary training materials for employees, Keeps the records of the complaints and/or suggestions in the Grievance Database with details (by whom, date, status, etc.), Searches the causes of the grievance and the social incidents that cause injuries, delays or stoppage in the work and disputes among the Project and communities, Monitors all complaints and ensures that all complaints are resolved and closed properly and in a timely manner, Follows the results of complaint and reporting on a weekly, monthly, and annual basis, Records and reports general and local employment rates and complaints, which are received or observed verbally, Fills out the "Grievance Register Form & Consultation Form" given in the appendices of SEP and GMP, Gives the feedback to the stakeholders about the results of their grievances through Complaint Register Form within 30 calendar days (complainants who have provided their names and contact information will be notified within 5 days that the grievance solution process has started and after the grievance closed).
HSE Manager	<ul style="list-style-type: none"> Makes periodic inspections of the performance of Contractors of its activities during operation phase, Works in cooperation with other departments in order to determine targets for Environmental, Social, HS and resource efficiency, Determines the national and international legislations that are applicable to the Project activities and informing the Operational Manager, Determines the environmental impacts and OHS hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances, Ensures that all provisions in the Contractor engagements regarding environmental, social and HS requirements as per the Project

Roles	Responsibilities
	<p>Standards during operation phase and auditing the performance of the Contractors on those requirements,</p> <ul style="list-style-type: none"> Provides answers to the OHS, environment and social grievances raised by employees, the local community and local institutions, Checks the environmental and OHS records and performance reviews of the Contractors.
Document Control Center (DCC) Staff	<ul style="list-style-type: none"> Uploads all management plans, policies, training minutes, environmental, social and HS records, and reports to DCC and keeping this system up to date, Records and keeps up to date all permits and/or the results of measurements taken within the scope of the Project, Makes documents accessible to all Project employees (including Contractors / Subcontractors' employees).
Contractors / Subcontractors & Employees	<ul style="list-style-type: none"> Contractors / Subcontractors are responsible not to make any commitment in their interactions with the stakeholders beyond their competence, Follows the rules listed in the SEP and other relevant Management System documentation of the Project, Complies with the requirements and standards of the SEP.

3.3 Internal and External Grievance Redress Mechanism

Table 3-3. Roles and Responsibilities in Internal and External Grievance Mechanism

Roles	Responsibilities
Top Management	<ul style="list-style-type: none"> Ensures GMP is implemented during the lifetime of the Project, Approves this GMP and providing necessary resources for the implementation of the procedure, Determines and makes the final decision for the Project info and social budget of the Project.
Operational Manager	<ul style="list-style-type: none"> Ensures the facility compliance with the national and international standards, and other requirements set out in this Procedure Coordinates between the parties for proper implementation of this Procedure, Makes periodic inspections of the performance of Contractors of its activities during operation phase, Reports to the Top Management about the system performance, Proposes the Project info and social budget of the Project to the Top Management, Makes the final decision concerning internal and external grievances (if needed) in light of the assessments of Social Responsibility Staff (SRS) and HSE Manager.
Social Responsibility Staff (SRS)	<ul style="list-style-type: none"> Implements and improves GMP, Ensures the Project compliance with the Project Standards and other requirements set out in this Procedure, Ensures that all site staff, including Contractors and Subcontractors worker's complaints process and resolutions, comply with this Procedure, Informs to workers about contract details and legal rights, Determines and provides the necessary social training materials for employees, Determines necessary resources for proper implementation of the Procedure and submitting to Operational Manager, Evaluates in compliance with laws and regulations, Searches the causes of the grievance and the social incidents that cause injuries, delays or stoppage in the work and disputes among the Project and communities, Monitors all complaints and ensuring that all complaints are resolved and closed,

Roles	Responsibilities
	<ul style="list-style-type: none"> Coordinates with parties for implementation of the Procedure, Creates all necessary reporting of worker grievance including monthly report to the Top Management, Investigates and proposing appropriate methodology for resolving the complaint, Follows procedures related to employment and training for site-specific issues, Records and reporting general and local employment rates and complaints, which are received or observed verbally, Fills out a "Grievance Register Form", Follows the results of complaint and reporting on a weekly, monthly and annual basis, Organizes cooperation activities with local communities, Organizes stakeholder meetings to collect the responses to grievances actively as required.
HSE Manager	<ul style="list-style-type: none"> Determines the environmental impacts and HS hazards in accordance with the actions, potential mitigation measures and measure to eliminate any potential social grievances, Provides answers to the OHS, environment and social grievances raised by the employees, the local community and local institutions, Helps SRS for keeping records of the complaints/suggestions in the Grievance Database with details, Supports SRS on the first evaluation of the relevance of grievances collected, Supports SRS for recording all formal and informal engagement activities, Determines of environmental, social and HS-related corrective measures if necessary, according to grievances received, Checks the environmental, social and OHS records and performance reviews of Contractors/Subcontractors.
Document Control Center (DCC) Staff	<ul style="list-style-type: none"> Knows the roles and responsibilities in all Project documents, Uploads all management plans, policies, training minutes, environmental, social and HS records, and reports to DCC and keeping this system up to date, Records and keeping up to date all permits and/or the results of measurements taken within the scope of the Project, Makes documents accessible to all Project employees (including Contractors / Subcontractors' employees).
Contractors / Subcontractors & Employees	<ul style="list-style-type: none"> Contractors / Subcontractors are responsible not to make any commitment in their interactions with the stakeholders beyond their competence, Ensures that relevant activities are undertaken in accordance with this Procedure, Ensures all personnel are fully trained in OHS, environmental and social issues. Complies with the requirements and standards of the GMP.

3.4 Noise Management

Table 3-4. Roles and Responsibilities in Noise Management

Roles	Description and Responsibilities
Top Management	<ul style="list-style-type: none"> Are responsible for ensuring the smooth functioning of this ESMP, Determines policies and targets, Evaluates the reports provided by the Operational Manager and ensures necessary actions were taken.
Operational Manager	<ul style="list-style-type: none"> Provides coordination among the parties in order to facilitate the implementation of this Plan, Provides the necessary resources for proper implementation,

Roles	Description and Responsibilities
HSE Manager	<ul style="list-style-type: none"> Reports the system performance to Top Management. Ensures the compliance of the Project with the Project Standards and other requirements specified in this Plan, Determines and implements the scope of the Plan, Develops, monitors and updates this Plan, Determines and supplies necessary ESHS training materials for all employees, Notifies the hazards, non-conformities, incidents, and accidents related to noise to the Operational Manager, Ensures that all personnel including management level be aware of this ESMP and its requirements, Ensures that noise-related incidents, complaints and non-compliances are reported and dealt with effectively, Works in coordination with the SRS on the evaluation of internal and external grievances received regarding noise, Performs periodic audits and inspections to check that the requirements of the plan are met and monitors the performance, Provide a system for monitoring the types and quantities of pollutions on the site.
Social Responsibility Staff (SRS)	<ul style="list-style-type: none"> Keeps records of complaints, suggestions and requests received from the local people and employees regarding noise caused by the Project activities. Executes and manages effectively the Internal and External Grievance Mechanism Procedure.
Document Control Center (DCC) Staff	<ul style="list-style-type: none"> Knows the roles and responsibilities in all Project documents, Uploads all management plans, policies, training minutes, environmental, social and HS records, and reports to DCC and keeping this system up to date, Recording and keeping up to date all permits and/or the results of measurements taken within the scope of the Project, Makes documents accessible to all Project employees (including Contractors / Subcontractors' employees).
Contractors / Subcontractors Employees	<ul style="list-style-type: none"> Responsible for acting according to this plan, fulfilling the requirements and determining the processes that require improvement, Completes all necessary ESHS trainings, Reports any activities which are causing unnecessary noise to HSE Manager, Avoids performing activities which unnecessarily generate noise.

3.5 Air Quality Management

Table 3-5. Roles and Responsibilities in Air Quality Management

Roles	Description and Responsibilities
Top Management	<ul style="list-style-type: none"> Responsible for ensuring the smooth functioning of this ESMP, Determines policies and targets, Evaluates the reports provided by the Operational Manager and ensures necessary actions were taken.
Operational Manager	<ul style="list-style-type: none"> Provides coordination among the parties in order to facilitate the implementation of this Plan, Provides the necessary resources for proper implementation, Reports the system performance to Top Management.
HSE Manager	<ul style="list-style-type: none"> Ensures the compliance of the Project with the Project Standards and other requirements specified in this Plan, Determines and implements the scope of the Plan, Develops, monitors and updates this Plan, Determines and supplies necessary ESHS training materials for all employees,

Roles	Description and Responsibilities
	<ul style="list-style-type: none"> Notifies the hazards, non-conformities, incidents, and accidents related to air quality and/or air pollution to the Operational Manager, Ensures that all personnel including management level be aware of this ESMP and its requirements, Ensures that air quality-related incidents, complaints and non-compliances are reported and dealt with effectively, Works in coordination with the SRS on the evaluation of internal and external grievances received regarding air quality / air pollution, Performs periodic audits and inspections to check that the requirements of the plan are met and monitors the performance, Provides a system for monitoring the types and quantities of pollutions on the site.
Social Responsibility Staff (SRS)	<ul style="list-style-type: none"> Keeps records of complaints, suggestions and requests received from the local people and employees regarding air pollution caused by the Project activities, Executes and manages effectively the Internal and External Grievance Mechanism Procedure.
Document Control Center (DCC) Staff	<ul style="list-style-type: none"> Knows the roles and responsibilities in all Project documents, Uploads all management plans, policies, training minutes, environmental, social and HS records, and reports to DCC and keeping this system up to date, Records and keeping up to date all permits and/or the results of measurements taken within the scope of the Project, Makes documents accessible to all Project employees (including Contractors / Subcontractors' employees).
Contractors / Subcontractors Employees	<ul style="list-style-type: none"> Is responsible for acting according to this plan, fulfilling the requirements and determining the processes that require improvement, Completes all necessary ESHS trainings, Reports any activities which are causing unnecessary air emissions and dust to HSE Manager, Avoids performing activities which unnecessarily generate air emissions and dust.

3.6 Waste Management

Table 3-6. Key Roles and Responsibilities

Roles	Responsibilities
Top Management	<ul style="list-style-type: none"> Ensures the WMP is implemented during the lifetime of the Project, Approves the WMP and resources required for implementation, Determines and makes the final decision for the Project info and social budget of the Project.
Operational Manager	<ul style="list-style-type: none"> Has the overall responsibility for the implementation of the WMP by fulfilling all necessary requirements, Ensures the facility's compliance with the national and international standards, and other requirements set out in the WMP, Coordinates with parties for proper implementation of the WMP, Reports to the Top Management about the system performance, Ensures national and international legislations/guidelines which are applicable to the Project activities are identified and tracked, Works in cooperation with other departments in order to determine targets for Environmental, Social and HS and resource efficiency issues, Makes the final decision concerning internal/external grievances (if needed) in the light of the assessments of Social Responsibility Staff and HSE Manager.

Roles	Responsibilities
HSE Manager	<ul style="list-style-type: none"> • Implements this Plan, • Makes periodic inspections of the performance of its activities during the operation phase, • Determines the national and international legislations that are applicable to the facility activities and informs the Operational Manager, if necessary, • Determines the environmental impacts and waste management hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances related to poor waste management, • Ensures that all provisions in the Contractor engagements regarding waste management requirements as per the standards and audit the performance of the Contractors for waste management, • Determines and provides the necessary ESHS training materials for employees, • Supports SRS on the evaluation of the relevance of grievances collected, • Conducts internal audits / site audits, • Determines corrective measures, if necessary, • Identifies the need for environmental trainings, • Monitors the permits and notices regarding waste management and ensures that the necessary permits are obtained, and necessary declarations are made in the required time intervals, •
Social Responsibility Staff (SRS)	<ul style="list-style-type: none"> • Maintains engagement and liaison with the local communities during the lifetime of the Project, • Reports and works in coordination with HSE Manager regarding with all grievances of hazards non-conformances related with waste management, Management of grievance procedures.
Document Control Center (DCC) Staff	<ul style="list-style-type: none"> • Knows the roles and responsibilities in all Project documents, • Uploads all management plans, policies, training minutes, records and reports to Document Control Center and keeps this system up to date, • Records and keeps up to date all permits and/or the results of measurements taken within the scope of the Project, • Makes documents accessible to all Project employees (including Contractor / Subcontractor employees).
Contractors / Subcontractors & Employees	<ul style="list-style-type: none"> • Ensure that relevant activities are undertaken in accordance with this Management Plan and related Procedures, • Ensure that all personnel are fully trained in waste management, • Report any activities which are causing unnecessary waste generation, • Avoid performing activities which unnecessarily generate waste.

3.7 Contractor Management

Table 3-7. Roles and Responsibilities in Contractor Management

Roles	Description and Responsibilities
Top Management	<ul style="list-style-type: none"> • Responsible for ensuring the smooth functioning of this ESMP, • Finalizes the Contracts with the relevant contractors
Operational Manager	<ul style="list-style-type: none"> • Ensures the Project compliance with the Project Standards and other requirements specified in this Management Plan, • Ensures that the Contractor Management Processes are carried out by the Project Responsible Departments, • Determines the scope of work for the Contractors together with HSE Manager and Social Responsibility Staff, • Supports the supplier selection process, • Ensures compliance of contracts with Project requirements,

Roles	Description and Responsibilities
	<ul style="list-style-type: none"> Verifies that the Contractors' tools and equipment are sufficient and appropriate for carrying out the works within the scope of the Project and meeting the Project Standards, Reports to Top Management on system performance/contractor performance.
Administrative Affairs Staff / Procurement Department	<ul style="list-style-type: none"> Initiates and management of procurement processes, Takes part in tender evaluations, if necessary, Provides administrative support for contract execution and payments, Participates in tender evaluations (evaluation from tenderers, including identifying HSE and harm to the public, verifying that their response is complete), Informs the Operational Manager about the mobilization, Organizes Project Entry and Site Entries for Contractors, if necessary.
HSE Manager	<ul style="list-style-type: none"> Ensures that contractors work in accordance with Project Standards and requirements, Periodically fills the Contractor Performance Scorecard, Assists the selection of suppliers, Supports the Administrative Affairs Staff / Procurement Department in the creation of the scope of contracts and Scope of Work, Participates in the tender evaluation to verify that environmental, social and H&S issues have been met by the tenders or included in the Tender Bid, Manages and supervises the compliance of contractors with ESMS Management Plans and Project standards, Confirms that the chemicals supplied and used by the contractors are registered by the Turkish authorities, Keeps MSDS records, Keeps and controls the records of medical examinations for all employees of the Project including the Contractors' and Subcontractors' employees.
Social Responsibility Staff (SRS)	<ul style="list-style-type: none"> Records, resolves and closes complaints about contractors, subcontractors and procurement issues, Helps HSE Manager for the development of the Scope of Work, as required.
Document Control Center (DCC) Staff	<ul style="list-style-type: none"> Keeps the records related to Contractors/Subcontractors and Supplier, and their employees, Knows the roles and responsibilities in all Project documents, Uploads all management plans, policies, training minutes, records and reports to Document Control Center and keeps this system up to date, Records and keeps up to date all permits and/or the results of measurements taken within the scope of the Project, Makes documents accessible to all Project employees (including Contractor / Subcontractor employees).
Contractors / Subcontractors & Employees	<ul style="list-style-type: none"> Responsible for acting according to this plan, fulfilling the requirements and determining the processes that require improvement, Fulfils the requirements of the works within the scopes of their contracts, Completes the project awareness and competence trainings, Provides the necessary tools and equipment in good working condition and in accordance with Contracts and Project conditions, Provides MSDS list of any chemical/material before bringing it to the project area.

3.8 Cultural Heritage Management

Table 3-8. Roles and Responsibilities in Cultural Heritage Management

Roles	Description and Responsibilities
Top Management	<ul style="list-style-type: none"> • Responsible for ensuring the smooth functioning of this ESMP.
Operational Manager	<ul style="list-style-type: none"> • Informs Top Management about the chance finds.
HSE Manager	<ul style="list-style-type: none"> • Provides trainings to employees on cultural heritage and chance find procedure, • Conducts cultural heritage processes if necessary.
Social Responsibility Staff (SRS)	<ul style="list-style-type: none"> • Coordinates organizations and other stakeholders for the implementation of cultural heritage/chance finds processes if necessary.
Contractors / Subcontractors & Employees	<ul style="list-style-type: none"> • Complies with the requirements and standards of cultural heritage and chance finds processes, • Receives training on cultural heritage and chance finds.

3.9 Occupational Health and Safety Management

Table 3-9. Key Roles and Responsibilities

Roles	Responsibilities
Top Management	<ul style="list-style-type: none"> • Approval of the OHSMP and resources required for implementation, • Ensures the Plan is implemented during the lifetime of the Project.
Operational Manager	<ul style="list-style-type: none"> • Has overall responsibility for the implementation of this Plan by fulfilling project requirements, • Ensures implementation of the commitments in this Plan, • Provides necessary resources for proper implementation of this Plan, • Ensures that the OHS rules are complied with by the employees.
HSE Manager	<ul style="list-style-type: none"> • Ensures that relevant activities are undertaken in accordance with this Plan and related procedures, • Reviews the OHSMP annually in operation phase, • Determines OHS and environmental impacts and hazards in accordance with the activities performed in the workplace, • Controls the HSE performances and records of the Contractors, • Updates risk assessment reports and conducting internal audits to determine whether the requirements of this Plan are implemented, • Ensures that the OHS trainings are organized to ensure that whole employees including Contractors are fully trained on OHS issues, • Expedites, monitors and follows up the whole Project employees including contractors for proper implementation of this Plan, • Ensures all OHS incidents investigations are undertaken and reported, • Reports all hazards, non-conformances and incidents, • Coordinates the related activities of this Plan, • Performs routine inspections for OHS and reports the results of the inspections to the Top Management, • Participates in incident investigation and reporting studies and HS meetings, • Prepares OHS training plans and programs related to these issues and rules in coordination with OHS specialist and Occupational Physician, submits to the Top Management for approval, and monitors the implementation of these programs and provides feedback in case of deficiencies, • Prepares an annual report on OHS status of the facility. Evaluates the activities of that year, evaluating the issues to be included in the following year's work program according to the experience obtained, and makes an offer to the Top Management.
Occupational Health and Safety Board	<ul style="list-style-type: none"> • Prepares a draft OHS internal directive suitable for the nature of the workplace, monitors the implementation of the directive, reports the monitoring results and determines the measures to be taken and puts them on the agenda of the Board,

Roles	Responsibilities
	<ul style="list-style-type: none"> Guides the employees in the workplace on OHS issues, Evaluates the hazards and precautions regarding OHS in the workplace and determines the precautions and notifies to the Top Management, Carries out the necessary research and examination in case of any occupational accident that occurs in the workplace, and incidents that have the potential to harm the workplace or work equipment, which are not considered as work accidents, or in case of occupational disease or a danger related to OHS, and determines the measures to be taken with a report to be given to the Top Management, Plans the necessary safety measures in maintenance and repair works in the workplace and control of these measures' implementation, Monitors the adequacy of the measures taken for fire, natural disaster, sabotage and similar hazards in the workplace and work of the teams, Works to develop a consistent and general prevention policy covering the effects of factors related to technology, business organization, working conditions, social relations and working environment in the workplace.
Occupational Physician	<ul style="list-style-type: none"> Contributes to the implementation of health precautions related to environment, health, and safety objectives, Conducts health training of the related personnel on the topics covered by OHSMP, Performs routine health examinations, Investigating all relevant incidents and reporting those to the HSE Manager, Cooperates with the HSE Manager and Operational Manager to develop, monitor and review the Plan, as necessary.
Occupational Safety Experts	<ul style="list-style-type: none"> Advises the employer to ensure that the planning, organization and implementation of work, including the status, maintenance, selection and use of machinery and other equipment, the work carried out in the workplace and the substances used, the selection, supply, use, maintenance, preservation and testing of personal protective equipment; are maintained in accordance with OHS legislation and general occupational safety rules. Provides risk assessment to be held. He/she makes recommendations to the employer about the health and safety measures to be taken by planning the necessary studies and follows up. Supervises the working environment; plans periodic maintenance, control and measurements that should be carried out in terms of OHS in the workplace and controls its implementation. Works in accordance with the legislation and follows the practices to prevent accidents, fires or explosions in the workplace. He/she provides the preparation of emergency plans for situations such as natural disasters, accidents, fires or explosions. He/she periodically conducts trainings and drills and ensures that it is acted in accordance with the emergency plans. Plans and implements OHS trainings in accordance with the national and international standards Records the studies related to the supervision of the working environment.
Project Engineers and Foremen	<ul style="list-style-type: none"> Provides effective control of workspaces and fulfills the requirements of the OHSMP, Manages the areas of activity safely, Organizes pre-work meetings before starting any work, Ensures all employees to be trained in the work they are working on and in basic first aid and firefighting practices, Helps injured or ill staff and immediately provides the necessary medical assistance,

Roles	Responsibilities
	<ul style="list-style-type: none"> Immediately reports all cases/accidents at the workplace to health and safety unit, Ensures relevant HS instructions, signs and symbols to be displayed in certain areas, and Ensures that all personnel working under his or her command wear protective equipment.
Employee Representative	<ul style="list-style-type: none"> Has the same responsibilities as general employees for their core duties, Is obliged to receive information provided by employees and to convey it to the Operational Manager and HSE Manager, Conveys the decisions made by the Operational Manager and/or HSE Manager, Attends to the specific training performed for him/her, Informs the Operational Manager, HSE Manager and Occupational Physician about risks.
Emergency Response Teams (ERT)	<ul style="list-style-type: none"> Plan and implement what needs to be done to prevent the injured and damaged personnel; partial or complete stop of production, activities and/or service; and adverse impact of the environment in any extraordinary situation that may occur in the workplace in advance. Ensure the followings: <ul style="list-style-type: none"> Establishment of a work plan for the management to make quick and correct decisions in case of emergency Rescue and treatment of those who have had accidents Saving employees and visitors Reduce damage to goods and materials Prevention and control of the spread of the danger Securing areas affected by the incident Storage of emergency equipment and records Transfer of necessary information to management and facility authorities
Contractors / Subcontractors / Suppliers & Employees	<ul style="list-style-type: none"> Comply with OHS rules, operational procedures, warning instructions, safety signs and symbols, Immediately notify all cases/accidents, Are informed enough about the dangers that may occur while working and how to work safely, Use personal protective equipment safely and appropriately in workplaces, Use tools and equipment safely and appropriately, Replace damaged personal protective equipment and tools with new ones, Clean the workspace after finishing the work, Are vigilant for emergencies and act in accordance with the emergency action plans, Always follow the OHS instructions.

3.10 Community Health and Safety Management

Table 3-10. Roles and Responsibilities in Community Health and Safety Management

Roles	Description and Responsibilities
Top Management	<ul style="list-style-type: none"> Responsible for ensuring the smooth functioning of this ESMP, Evaluates the reports provided by Operational Manager, Determines the project information and social budget of the project.
Operational Manager	<ul style="list-style-type: none"> Researches and provides the necessary resources for the correct implementation of the Plan, Coordinates between parties for the proper implementation of ESMP, Reports to Top Management about the system performance,

Roles	Description and Responsibilities
HSE Manager	<ul style="list-style-type: none"> Makes final decisions on internal/external complaints in the light of the evaluations of SRS and HSE Manager of the Project. Ensures that the plan is implemented correctly, Determines the national and international legislation to be applied to the Project activities and informs the Operational Manager, Conducts periodic audits to evaluate contractors' performance, Ensures that this Management Plan is implemented together with SRS, Identifies environmental, social and H&S hazards and impacts to the local communities and determines the possible mitigation measures in order to eliminate potential environmental and social grievances, Ensures all provisions regarding environmental, social and OHS requirements in the Contractor's contracts in accordance with the project standards, Determines and provides necessary training materials for employees and identifies training needs in terms of environmental, social and H&S issues, Responds to environmental, social and H&S-related complaints, suggestions and requests of local people, institutions and employees, Assists SRS in assessing the relevance of complaints, Supports the SRS to record all formal and informal community engagement activities, Controls the risk management and crisis management processes, Conduction feedback training programs for correction of defects in drills, Ensures that related project personnel receive full training on traffic safety.
Social Responsibility Staff (SRS)	<ul style="list-style-type: none"> Keeps records of complaints/suggestions/requests in the Grievance Database with details (by whom, date, status, etc.), Coordinates with the HSE Manager in the initial assessment of the appropriateness of the complaints collected, Provides the necessary information to the complainants about the complaints of the community, Records all formal and informal engagement activities with local communities in the DCC, Keeps records of prepared and distributed brochures, newsletters, information sheets, etc. according to their locations, Monitors and records the social responsibility activities carried out within the scope of the Project, Establishes relationships with project stakeholders, Organizes stakeholder meetings to actively collect responses to complaints as needed, Provides feedback to stakeholders about the results of their complaints via External Grievance Register Form within 30 working days (complainants who provide their names and contact information will be notified within 5 working days of the commencement of the complaint resolution process and the closing of the complaint), Coordinates and communicates with the civil authority, law enforcement, local authority and local community on security issues.
Contractors / Subcontractors / Suppliers & Employees	<ul style="list-style-type: none"> Responsible for acting according to this plan, fulfilling the requirements and determining the processes that require improvement, Carries out activities within the scope of contracts, Ensures that the necessary tools and equipment are in good working order in accordance with the manufacturer's specifications.

4 NATIONAL AND INTERNATIONAL STANDARDS

4.1 Applicable National Standards

National legislation applicable to the management of environmental, social, labor and OHS aspects of the Project are identified in the following sections.

4.1.1 Environmental and Social Legislation

Main principles for the protection of environment and sustainability are defined in the Environmental Law (Law no: 2872, Official Gazette no: 18132, date: 11.08.1983). Under its wide scope, legislative framework for regulation of industries/facilities and their liabilities regarding the assessment and management of their potential impacts are provided including permitting and information/declaration requirements. The last amendments to the Environmental Law were issued on 22.02.2019 by Law numbered 7166 for Additional Article (11) and Temporary Article (4).

The regulations developed under this law aims to specify and identify the procedures and principles of the management of particular environmental aspects. In addition to Environmental Law, there are several associated laws which are complementary regarding the protection and sustainability of the environment as well as the protection of health and safety rights of people. Those laws which would be applicable to the Project are listed below:

- ✓ Expropriation Law (Law no: 2942, OG no: 18215, OG date: 08.11.1983)
- ✓ Forestry Law (Law no: 6831, OG no: 9402, OG date: 08.09.1956)
- ✓ Groundwater Law (Law no: 167, OG: 10688, OG date: 23.12.1960)
- ✓ Law on National Parks (Law no: 2873, OG no: 18132, OG date: 11.08.1983)
- ✓ Law on Conservation of Cultural and Natural Assets (Law no: 2863, OG no: 18113, OG date: 23.07.1983)
- ✓ Highways Traffic Law (Law no: 2918, OG no: 18195, OG date: 13.10.1983)
- ✓ Law on Soil Conservation and Land Use (Law no: 5403, OG no: 25880, OG date: 19.07.2005)
- ✓ Law on Aquaculture (Law no: 5488, OG no: 1380, OG date: 04.04.1971)
- ✓ Law on Terrestrial Hunting (Law no: 4915, OG no: 25165, OG date: 11.07.2003)
- ✓ Labor Law (Law no: 4857, OG no: 25134, OG date: 10.06.2003)
- ✓ Occupational Health and Safety Law (Law no: 6331, OG no: 28339, OG date: 30.09.2012)
- ✓ Law on Utilization of Renewable Energy Resources for Electricity Generation (Law no: 5346, OG no: 25819, OG date: 18.05.2005)

Under the relevant laws, several regulations or communiques have been prepared and put into force, which are summarized in the following table:

Table 4-1. Applicable National Standards

Applicable National Regulations and Communiques		
General and Environmental Regulations	OG no	OG date
Regulation on Environmental Impact Assessment	29186	25.11.2014
Regulation on Environmental Permits and Licenses	29115	10.09.2014
Regulation on Environmental Management Services	30847	30.07.2019
Communiqué on Vocational Qualification Institution, Vocational Qualification Certificate Requirements on Professions (Order No: 2019/1)	30907	03.10.2019
Regulation on Environmental Audit	27061	21.11.2008
Regulation for Opening and Working Licenses	25902	10.08.2005
Regulation on the Implementation of the Law Concerning Private Security Services	25606	07.10.2004
Air Quality	OG no	OG date
Turkish Air Quality Assessment and Management Regulation	26898	06.06.2008
Regulation on Monitoring of Greenhouse Gas Emissions	29003	17.05.2014
Turkish Industrial Air Pollution Control Regulation	27277	03.07.2009
Regulation on Control of Air Pollution Originated from Heating	25699	13.01.2005
Regulation on Reduction of Sulphur Rates in Certain Types of Fuels	27368	06.10.2009
Exhaust Gas Emission Control Regulation	30004	11.03.2017
Biodiversity Conservation and Protection of Nature	OG no	OG date
Statutory Decree on Establishment of a Special Environmental Protection Agency	383	19.10.1989
Animal Protection Law	5199	24.06.2004
Regulation on the Protection of Wetlands	25818	17.05.2005
Regulation on Implementation of Convention on International Trade in Endangered Species of Wild Fauna and Flora (Regulation on Implementation of CITES)	24623	27.12.2001
Regulation on Removal, Production and Export of Natural Flower Bulbs	28358	19.07.2012
Regulation on Aquaculture	22223	10.03.1995
Regulation on Protection of Wildlife and Wildlife Development Area	259637	08.11.2004
Chemicals	OG no r	OG date
Regulation on Classification, Labelling and Package of the Materials and Mixtures	28848*	11.12.2013
Regulation on Registration, Evaluation, Authorization and Restriction of Chemicals	30105*	23.06.2017
Regulation on Persistent Organic Pollutants	30595	14.11.2018
Regulation on the Control of Polychlorinated Biphenyls (PCBs) and Polychlorinated Terphenyls (PCTs)	26739	27.12.2007
Noise	OG no r	OG date
Regulation on Assessment and Management of Environmental Noise	27601	04.06.2010
Regulation Related to Noise Emissions by Equipment for Outdoor Use	26392*	30.12.2006
Regulation on the Protection of Employees from Risks About Noise	28721	28.07.2013
Soil and Land Use	OG no	OG date
Regulation on Soil Pollution Control and Contaminated Sites by Point Source	27605	08.06.2010

Applicable National Regulations and Communiques		
Regulation on Control of Excavated Soil, Construction and Demolition Wastes	25406	18.03.2004
Regulation on the Extraction, Operation, and Control of Sand, Gravel, and Similar Materials	26724	08.12.2007
Regulation on Protection, Use and Planning of Agricultural Lands	30265	09.12.2017
Waste	OG no	OG date
Regulation on Waste Management	29314	02.04.2015
Zero Waste Regulation	30829	12.07.2019
Packaging Waste Control Regulation	30283	27.12.2017
Regulation on Waste Oil Management	30985	21.12.2019
Medical Waste Control Regulation	29959	25.01.2017
Regulation on Control of Waste Vegetable Oils	29378	06.06.2015
Regulation on Control of Electric and Electronic Goods	28300	22.05.2012
Regulation on Control of Waste Batteries and Accumulators	25569	31.08.2004
Regulation on Excavation, Construction and Demolition Waste	25406	18.03.2004
Regulation on Regular Storage of Wastes	27533	26.03.2010
Regulation on Control of End-of-life Tires	26357	25.11.2006
Regulation on Control of End-of-life Vehicles	27448	30.12.2009
Communique on Recovery of Some Non-Hazardous Waste	27967	17.06.2011
Communique on Transportation of Wastes by Highway	29301	20.03.2015
Water and Wastewater	OG no r	OG date
Regulation on Monitoring of Surface Water and Groundwater	28910	11.02.2014
Regulation on Management of Surface Water Quality	28483	30.11.2012
Regulation on Water Pollution Control	25687	31.12.2004
Regulation on Protection of Wetlands	28962	04.04.2014
Regulation on Protection of Groundwater against Pollution and Deterioration	28257	07.04.2012
Regulation on Control of Pollution Caused by Hazardous Substances in the Aquatic Environment and Its Surroundings	26005	26.11.2005
Regulation on Pits to Be Built in Places Where Sewerage Is Impossible to Be Built	13783	19.03.1971
Regulation on Water Intended for Human Consumption	25730	17.02.2005
Regulation on Quality and Treatment of Surface Waters Used to Obtain Drinking Water	30823	06.07.2019
Regulation on Wastewater Collection and Remote Systems	29940	06.01.2017
Regulation on the Procedures and Principles to Be Followed in the Determination of Wastewater Infrastructure and Domestic Solid Waste Disposal Plant	27742	27.10.2010
Structural Safety	OG no	OG date
Regulation on Structures in Natural Disaster Areas	26582	14.07.2007
Regulation on Building Constructions in Earthquake Zones	26454	06.03.2007
Traffic	OG no	OG date
Regulation on the Transportation of Hazardous Substances by Highway	30754	24.04.2019
Regulation on Highway Traffic	23053*	18.07.1997
Labor and Occupational Health and Safety	OG no	OG date
Regulation on Emergency Situations in Workplaces	28681	18.06.2013
Regulation on Health and Safety at Construction Works	28786	05.10.2013
Regulation on Health and Safety Conditions Regarding Use of Work Equipment	28628	25.04.2013

Applicable National Regulations and Communiques		
	OG no	OG date
Regulation on Health and Safety Precautions Regarding Working with Chemicals	28733	12.08.2013
Regulation on Health and Safety Regarding Temporary and Time Limited Works	28744	23.08.2013
Regulation on Health and Safety Signs	28762	11.09.2013
Regulation on Management of Dust	289812	05.11.2013
Regulation on Material Safety Data Sheets on Hazardous Materials and Mixtures	29204	13.12.2014
Regulation on Occupational Health and Safety	25311	09.12.2003
Regulation on Personal Protective Equipment	30761	01.05.2019
Regulation on Protection of Workers from Risks Created by Noise	28721	28.07.2013
Regulation on Risk Assessment for Occupational Health and Safety	28512	29.12.2012
Regulation on Subcontractors	27010	27.09.2008
Regulation on Suspension of Work in Workplaces	28603	30.03.2013
Regulation on Use of Personal Protective Equipment in Workplaces	28695	02.07.2013
Regulation on Vocational Training of the Employees Working in Dangerous and Highly Dangerous Workplaces	28706	13.07.2013
Regulation on the Procedures and Principles of Employee Health and Safety Trainings	28648	15.05.2013
Cultural Heritage		OG no
Law on Protection of Cultural and Natural Assets	18113	23.07.1983
Regulation on Determination and Registration of Immovable Cultural and Natural Heritage	19660	10.12.1987

4.2 Applicable International Standards, Legislations and Guidelines

Applicable international standards, legislations and guidelines are given as:

- ✓ IFC Performance Standards
- ✓ IFC EHS Guidelines
- ✓ AIIB Environmental and Social Framework and Standards.

4.2.1 International Finance Corporation Performance Standards

IFC's Sustainability Framework (2012) includes the Performance Standards and all investment advisory clients whose projects go through IFC's initial credit review process are expected to meet these standards. IFC Performance Standards on Environmental and Social Sustainability (2012) are;

- ✓ PS 1: Assessment and Management of Environmental and Social Risks and Impacts
- ✓ PS 2: Labor and Working Conditions
- ✓ PS 3: Resource Efficiency and Pollution Prevention
- ✓ PS 4: Community Health, Safety and Security
- ✓ PS 5: Land Acquisition and Involuntary Resettlement
- ✓ PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

- ✓ PS 7: Indigenous Peoples
- ✓ PS 8: Cultural Heritage

PS 1: Assessment and Management of Environmental and Social Risks and Impacts

PS 1 establishes the importance of integrated assessment to identify the environmental and social impacts, risks and opportunities of the Project; also, for effective community engagement through disclosure. Objectives of PS 1 are:

- ✓ To identify and evaluate environmental and social risks and impacts of the Project.
- ✓ To adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimize, and, where residual impacts remain, compensate/offset for risks and impacts to workers, Affected Communities, and the environment.
- ✓ To promote improved environmental and social performance of clients through the effective use of management systems
- ✓ To ensure that grievances from Affected Communities and external communications from other stakeholders are responded to and managed appropriately.
- ✓ To promote and provide means for adequate engagement with Affected Communities throughout the project cycle on issues that could potentially affect them and to ensure that relevant environmental and social information is disclosed and disseminated.

PS 2: Labor and Working Conditions

PS 2 recognizes that the pursuit of economic growth through employment creation and income generation should be accompanied by protection of the fundamental rights of workers. Objectives of PS 2 are:

- ✓ To promote the fair treatment, non-discrimination, and equal opportunity of workers.
- ✓ To establish, maintain, and improve the worker-management relationship.
- ✓ To promote compliance with national employment and labor laws.
- ✓ To protect workers, including vulnerable categories of workers such as children, migrant workers, workers engaged by third parties, and workers in the client's supply chain.
- ✓ To promote safe and healthy working conditions, and the health of workers.
- ✓ To avoid the use of forced labor.

PS 3: Resource Efficiency and Pollution Prevention

PS 3 recognizes that increased economic activity and urbanization often generate increased levels of pollution to air, water, and land, and consume finite resources in a manner that may

threaten people and the environment at the local, regional, and global levels. The objectives of PS 3 are:

- ✓ To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities
- ✓ To promote more sustainable use of resources, including energy and water.
- ✓ To reduce project related GHG emissions.

PS 4: Community Health, Safety and Security

PS 4 recognizes that project activities, equipment and infrastructure can increase community exposure to risks and impacts. The objectives of PS 4 are:

- ✓ To anticipate and avoid adverse impacts on the health and safety of the Affected Community during the project life from both routine and non-routine circumstances.
- ✓ To ensure that the safeguarding of personnel and property is carried out in accordance with relevant human rights principles and in a manner that avoids or minimizes risks to the Affected Communities.

PS 5: Land Acquisition and Involuntary Resettlement

PS 5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons that use this land. Objectives of PS 5 are:

- ✓ To avoid, and when avoidance is not possible, minimize displacement by exploring alternative project designs.
- ✓ To avoid forced eviction.
- ✓ To anticipate and avoid, or where avoidance is not possible, minimize adverse social and economic impacts from land acquisition or restrictions on land use by
 - i. providing compensation for loss of assets at replacement cost and
 - ii. ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected.
- ✓ To improve, or restore, the livelihoods and standards of living of displaced persons.

To improve living conditions among physically displaced persons through the provision of adequate housing with security of tenure at resettlement sites.

PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

PS 6 recognizes that protecting and conserving biodiversity, maintaining ecosystem services, and sustainably managing living natural resources are fundamental to sustainable development. The objectives of PS 6 are:

- ✓ To protect and conserve biodiversity
- ✓ To maintain the benefits from ecosystem services
- ✓ To promote the sustainable management of living natural resources through the adoption of practices which integrate conservation needs and development priorities.

PS 7: Indigenous Peoples

PS 7 recognizes that indigenous people as social groups with identities that are distinct from mainstream groups in national societies, are often among the most marginalized and vulnerable segments of the population and sets objectives to anticipate and avoid adverse impacts of projects on them through ensuring appropriate management and consultation principles.

It should be noted that PS 7 is not relevant to the Project, since there are no indigenous people in Turkey.

PS 8: Cultural Heritage

PS 8 recognizes that the importance of cultural heritage for current and future generations. The objectives of PS 8 are:

- ✓ To protect cultural heritage from the adverse impacts of project activities and support its preservation.
- ✓ To promote the equitable sharing of benefits from the use of cultural heritage.

Environmental Health and Safety Guidelines

IFC has in place a comprehensive set of Environmental Health and Safety Guidelines, which aims to provide a technical information source for the projects during appraisal activities. The guidelines include examples of Good International Industry Practice (GIIP). In the case that project country regulations differ from the provisions of related EHS guidelines, the more stringent of the standards are required to be complied with.

In addition to the General EHS Guidelines (April 2007) that provide multiple guidelines under subjects of environment, occupational health and safety, community health and safety, and construction and decommissioning; IFC also has the Industry Sector Guidelines in place. The Industry Sector Guidelines can be applicable to the Project. Both industry-specific EHS guidelines provide information on major, sector-specific EHS issues, developments and recommendations mitigation/management measures for the possible impacts.

4.2.2 **AIIB Environmental and Social Framework and Standards**

Asian Infrastructure Investment Bank (AIIB) has three main Environmental and Social Standards (ESSs), which are:

- ✓ ESS-1: Environmental and Social Assessment and Management
- ✓ ESS-2: Involuntary Resettlement
- ✓ ESS-3: Indigenous Peoples

ESS-1: Environmental and Social Assessment and Management

The main objective of this ESS-1 is “to ensure the environmental and social soundness and sustainability of Project and to support the integration of environmental and social considerations into the Project decision-making process and implementation.”

ESS-1 covers assessment and management process, environmental coverage, social coverage, working conditions and community health and safety. Assessment and Management Process Section of the Standard includes the requirements of environmental and social assessment, examination of alternatives, addressing of impacts, environmental and social management plan and planning framework, information disclosure, grievance mechanism and implementation and monitoring.

Environmental Coverage of the ESS-1 includes environmental risks and impacts, biodiversity consideration, conserving biodiversity, critical habitats, natural habitats, protected areas, sustainability of land and water use, precautionary approach, pollution prevention, resource efficiency, climate change and greenhouse gases.

Social Coverage of the ESS-1 includes social risks and impacts, vulnerable groups and discrimination, gender, land and natural resource access, loss of access to assets or resources or restrictions on land use and cultural resources.

Working Conditions and Community Health and Safety of the ESS-1 covers safe working conditions and community health and safety requirements, child labor and forced labor, labor management relationships in private sector projects, building safety, traffic and road safety and the requirements of security personnel.

ESS-2: Involuntary Resettlement

The main objective of ESS-2 is “to avoid Involuntary Resettlement wherever possible; to minimize Involuntary Resettlement by exploring Project alternatives; where avoidance of Involuntary Resettlement is not feasible, to enhance, or at least restore, the livelihoods of all displaced persons in real terms relative to pre-Project levels; to improve the overall socioeconomic status of the displaced poor and other vulnerable groups; and to conceive and

implement resettlement activities as sustainable development programs, providing sufficient resources to enable the persons displaced by the Project to share in Project benefits.”

It covers the requirements of; planning, resettlement plan, abbreviated resettlement plan, resettlement planning framework, proportionality, consultations, grievance mechanism, social support, livelihood restoration, resettlement assistance, standards of living, persons without title or legal rights, negotiated settlement, information disclosure, implementation, compensation and entitlements, supervision and monitoring.

ESS-3: Indigenous Peoples

The main objective of ESS-3 is “to design and implement Projects in a way that fosters full respect for Indigenous Peoples’ identity, dignity, human rights, economies and cultures, as defined by the Indigenous Peoples themselves, so that they: (a) receive culturally appropriate social and economic benefits; (b) do not suffer adverse impacts as a result of Projects; and (c) can participate actively in Projects that affect them.”

4.3 Project Standards

The Project will meet both national and international standards. In case those differ, the most stringent requirement will be met.

5 KEY MITIGATION MEASURES AND MANAGEMENT CONTROLS

5.1 Biodiversity Management

5.1.1 Findings

Adiyaman Cement Factory is located in Adiyaman Province and Narlı Cement Factory is located in Kahramanmaraş Province, Pazarcık District. No construction activities will be carried out within the scope of the Project.

Since the Project areas are located within the field of agriculture and industry, they have been subjected to intense anthropogenic pressure. Generally, economically income-generating products have been planted, and also cement facilities have been established in these regions to produce cement, ready-mixed concrete. Due to many reasons such as overuse of plant resources in nature, over grazing, field openings, air and water pollution, and climatic changes; the natural vegetation and biodiversity elements have been suppressed and/or disappears. For this reason, natural vegetation cover has disappeared as a result of long-lasting anthropogenic pressure on these areas due to industrialization and agriculture, and habitat of plant and animal species have been lost.

In addition, the presence of protected areas, important nature areas, important bird areas and other featured areas were also investigated in the regions. The Project sites in question are not included in these areas.

5.1.2 **Mitigation Measures**

In order to protect existing biodiversity elements, the following mitigation measures should be implemented within the scope of the Project:

- ✓ As far as possible, the project site and the project access roads should be moved and going out of the determined routes should be prevented,
- ✓ Exit to natural areas outside the project site should be prohibited or ensured to be as little as possible,
- ✓ Various measures should be taken to minimize the effects of noise and air emissions from vehicles. The maintenance of the motor vehicles to be used should be done regularly and quality fuel, spare parts and lubrication products should be used,
- ✓ The effects of dust emissions on plants in the region should be minimized by irrigation on unpaved roads,
- ✓ For exhaust and dust emissions, the relevant national and international legislation provisions should be complied with, and the specified limit values should not be exceeded. In this direction, necessary monitoring studies should be carried out,
- ✓ Wastewater should never be discharged to the receiving environment,
- ✓ Domestic solid wastes to be generated should be collected in garbage containers located within the project site, should not be taken out of the project area in any way and should be disposed of appropriately,
- ✓ Packaging wastes (metal, glass, plastic, paper, etc.) to be generated should be collected separately in collection containers according to their qualities and disposed of in accordance with the provisions of the relevant national and international standards,
- ✓ Hazardous wastes to be generated should be stored in the temporary waste storage area and disposed of according to national standards,
- ✓ Illegal hunting should be prohibited by informing the personnel working within the scope of the project.

5.2 **Stakeholder Engagement**

The details of the stakeholder engagement activities are given in Stakeholder Engagement Plan (ÇİMKO-PLN-SOC-SEP-001) prepared for the Project. It includes the processes and methods for:

- ✓ Stakeholder identification,
- ✓ Stakeholder engagement planning,
- ✓ Public participation meetings,
- ✓ Tools and methods for information disclosure,
- ✓ Management of grievances, and
- ✓ Monitoring, training, auditing and reporting requirements.

5.3 Internal and External Grievance Mechanism

The details of the grievance mechanism are given in Grievance Mechanism Procedure (Internal and External) (ÇİMKO-PRC-SOC-GMP-001) prepared for the Project. It includes the processes for:

- ✓ Internal grievance management,
- ✓ External grievance management,
- ✓ Communication tools and methods,
- ✓ Monitoring, training, audit and reporting requirements.

5.4 Noise Management

General mitigation measures to be taken in the scope of the Project for the noise control are given as:

- ✓ Sensitive receptors will be informed about the schedule prior to beginning of the noisy activities, when required,
- ✓ Equipment will be maintained regularly,
- ✓ Noise monitoring program will be conducted in case of any complaint to verify compliance with regulatory limits. Moreover, noise measurements will be performed in case of complaints regarding noise,
- ✓ Stakeholder Engagement Plan and Grievance Mechanism Procedure (Internal and External) will be implemented,
- ✓ Signboards and necessary warnings will be placed where noisy activities are present,
- ✓ Warning signs will be placed in the work areas for the prevention of all kinds of work accidents and for providing the occupational health of the workers,
- ✓ Ear plugs will be provided to all employees and the usage of those equipment will be ensured,
- ✓ Necessary other measures will be taken by the Contractor against the issues that will adversely affect the environmental and community health.

5.5 Air Quality Management

General mitigation measures to be taken in the scope of the Project for the air quality control are given as:

- ✓ Access road and internal roads will be sprayed to suppress dust,
- ✓ Speed limitations will be enforced for vehicles,
- ✓ Heavy vehicles/trucks will not be permitted to keep engines running while waiting to enter to the site or waiting on-site,
- ✓ Well and adequate maintained vehicles will be used, and regular maintenance of these vehicles will be ensured,
- ✓ National regulations related to air quality and air pollution control, especially Industrial Air Pollution Control Regulation and Air Quality Assessment and Management Regulation, will be obeyed, and necessary mitigation measures will be taken in line with the national and international standards,
- ✓ Air quality measurements will be conducted in every two years in compliance with Industrial Air Pollution Control Regulation,
- ✓ Stakeholder Engagement Plan and Grievance Mechanism Procedure (Internal and External) will be implemented to collect complaints and suggestions of local people and workers through the Grievance Mechanism to be established during the lifetime of the Project.
- ✓ Air quality monitoring will be performed in accordance with this AQMP requirements and defined key performance indicator (KPIs).
- ✓ Exhaust inspections of vehicles and other machinery/equipment will be made periodically, and the results are recorded in DCC.
- ✓ All necessary pollutant emission (e.g. stack gas emissions) measurements regarding air quality are carried out periodically in accordance with the legal requirements, and additional measures will be taken for pollutants exceeding the limit values specified in the national and international standards.
- ✓ Stack gas treatment methods such as gas scrubbing, active carbon systems, biofiltration will be used to reduce process-induced stack gas emissions, if necessary, and system performance will be checked at regular intervals.
- ✓ Regular stack gas emission measurements are held in accordance with the national and international standards, and the results are evaluated. For the pollutants which exceeds the limit values, additional mitigation measures will be implemented.

In addition to these, taking the following measures will also contribute to reducing greenhouse gas emissions from the Project activities;

- ✓ Preventing the use of more than necessary fuel (natural gas and/or electricity),
- ✓ Maintaining the efficiency of all machinery and equipment at regular intervals,
- ✓ Efficient use of electricity and natural gas,
- ✓ Insulation.

5.6 Waste Management

General mitigation measures to be taken in the scope of the Project for waste management are as follows:

- ✓ Waste disposal agreements with the relevant Municipalities and/or institutions and licensed recovery/recycle/disposal companies will be ensured and renewed, if necessary,
- ✓ Relevant international and national requirements will be controlled and met,
- ✓ Adequate and appropriate storage areas within the investment/operation area will be provided, and the permit for the temporary waste storage,
- ✓ Container features will be in line with the national and international standards,
- ✓ Hazardous and non-hazardous wastes, and also, recyclable and non-recyclable wastes will be stored separately at source until they are sent to recovery or disposal,
- ✓ The relevant license of the companies that will carry/recover/dispose the wastes will be ensured,
- ✓ Trainings on reduction of waste and general waste management will be given to personnel,
- ✓ Disposal or burying of wastes will not be allowed under any circumstances,
- ✓ Visual checks on site will be conducted to ensure proper housekeeping, and
- ✓ Waste control records will be kept in line with this Plan.

5.6.1 Non-Hazardous Wastes

Non-hazardous wastes will be generated during the operational activities of the Project.

Domestic solid waste from the personnel will be collected in closed containers to be emptied and disposed of at certain intervals by Adıyaman Municipality in Adıyaman Cement Factory and Pazarcık Municipality in Narlı Cement Factory.

The non-contaminated packaging waste generated from the packaging materials used such as the packing paper, plastic and glass bottles, will be collected separately from other wastes and will be sent to licensed recycling facility in accordance with the Regulation on Control of Packaging Waste.

In case that end-of-life tires is generated at the facilities, those will be stored in the temporary waste storage area and using in these facilities as Refuse Derived Fuel in rotary kiln.

5.6.2 Waste Vegetable Oils

Waste vegetable oils generated from the cafeteria of both facilities will be collected in accordance with the national and international standards. The records of the waste vegetable oils delivered to the recovery company will be kept in DCC.

5.6.3 Hazardous Wastes

All hazardous wastes to be generated at all stages of the Project are occurred as a result of operation activities of the Project. These wastes (i.e., contaminated absorbent, waste oil tubes, fluorescent tubes, cartridges & toners etc.) will be stored in temporary waste storage area safely for a maximum of 6 months and will be sent to a licensed disposal facility by licensed transportation vehicles as per national legislations by ÇİMKO.

Additionally, medical wastes will be transferred to appropriate facilities by licensed firms.

5.6.4 Industrial Wastes

The industrial wastes and waste codes that may occur in the facilities are summarized in the table below.

Table 5-1. Waste Types and Waste Codes

Waste Code	Waste Type
15 01 10	Packages containing residues of hazardous goods or contaminated with hazardous substances
15 02 02	Absorbers, filter materials (oil filters not otherwise specified), cleaning cloths, protective clothing contaminated with hazardous substances
20 01 21	Fluorescent lamps and other waste containing mercury
20 01 26	Liquid and solid oils other than 20 01 25
08 03 17	Waste print toners containing hazardous materials
16 02 13	Discard equipment containing hazardous parts other than 16 02 09 to 16 02 12

Those industrial wastes will be stored in temporary waste storage area safely for a maximum of 6 months and will be sent to a licensed disposal facility by licensed transportation vehicles as per national legislations. Also, necessary notifications will be made to the Ministry of Environment, Urbanization and Climate Change through online waste declaration systems. Waste Declaration Forms, MOTAT and BEKRA notifications will be made in the required time intervals to the relevant institutions.

5.7 Contractor Management

The key steps of the contractor engagement and management process as implemented by the Project are as follows:

- ✓ Qualification and Sourcing,
- ✓ Planning and Preparation,
- ✓ Mobilization,
- ✓ Management of work,
- ✓ Reviewing, Updating and Close-out.

Subcontractors will be selected by a due diligence process. In this selection process, it is required to be filled “H&S Checklist” (see *Appendix A*) by the related department of the Project to let sub-contractors start their works at the site. After completion of this selection process, a kick-off meeting will be held with each of the selected contractors before they started to work.

Grievance Mechanism Procedure developed for the Project will be followed and implemented by contractors and subcontractors. The relevant suppliers that will provide goods/services continuously during the lifetime of the project will be informed of how the Grievance Mechanism works. It is required to ensure that this procedure is easily reachable by supply chain workers.

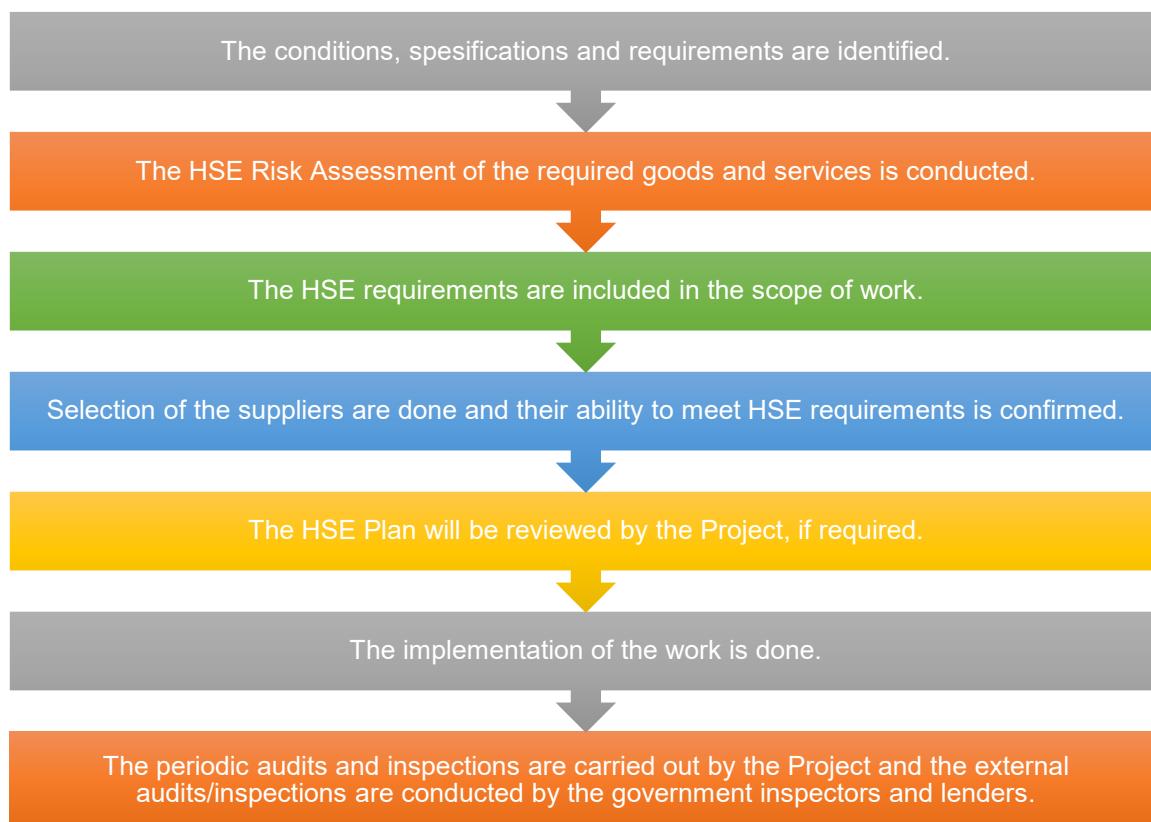


Figure 5-1. Process of Contractor Management

5.7.1 Requirements of Contractor Management

All contractors and subcontractors will be responsible for compliance of the Project Standards. Existing labour practices and HSE systems of contractors are important criteria to evaluate contractor performance. New contractor selection and agreements should consider this

evaluation. Identification of SoW and relation to Project Standards should be assessed. If there are any existing contractors, these contracts should be reviewed for consistency of implementation of Environmental and Social requirements in all activities of the Project.

Below Table 5-2 summarizes the management control requirements. The Project will implement these requirements to manage the contractors and ensure alignment and compliance with the Project Standards and requirements.

Table 5-2. Contractor Management Requirements of the Project

Requirement	Implementation	Means of Verification
A process must identify and evaluate the risks associated with the planned procurement of materials, equipment, services, and labour, including an assessment of the risks of non-compliance or non-conformance with the Project Standards.	<ul style="list-style-type: none"> Development of scope of work using SoW checklist Performing risk assessment, if required 	Scope of work and risk assessment (if required)
A process must be used for evaluation of a supplier's ability to provide materials, equipment and/or services that meet the defined specifications, design criteria and Project Standards. Evaluations and any related actions must be documented.	<ul style="list-style-type: none"> Evaluation of bids Assessment against the Project Standards 	Evaluation of bids
The required specifications must be met by all materials, equipment, services, and labour procured or supplied for the control of HSE, community and compliance risks associated with their intended use or activity, as identified in the risk assessment process.	<ul style="list-style-type: none"> Evaluation of bids Assessment against the Project Standards Assessment against the risk assessment 	Verification of HSE hazard identification responses by bidders
A registration must be kept for hazardous materials (preferably with a link to an inventory system) that are approved for use onsite. This register must be available, referred to, and maintained to control the purchase and introduction of new materials. All hazardous materials introduced by the contractors or visitors must also be included on or evaluated against this register.	<ul style="list-style-type: none"> Provision of the MSDS to the HSE Manager for verification 	Register of hazardous materials
The properties of all materials (including their process intermediates, by-products, and wastes) must be adequately understood, documented and integrated into the operating procedures where exposure to their properties presents a significant risk to the HSE performance. Legally compliant Material Safety Data Sheets (MSDS) must be available before the delivery and use of such materials (including products).	<ul style="list-style-type: none"> Provision of the MSDS to the HSE Manager for verification 	MSDS

Requirement	Implementation	Means of Verification
<p>The management process of the contractors includes the following phases:</p> <ol style="list-style-type: none"> 1. Selection of contractors, 2. Preparation of contractors, 3. Orientation and training, 4. Contractor management, 5. Post-evaluation. <p>Individuals engaged in a temporary or casual basis to work within existing businesses/managed sites are to be inducted and managed in the same way as employees.</p>	<ul style="list-style-type: none"> • Contractor Management Process 	Review of the records
<p>For all contracted labour or service agreements, there must be an agreed scope of work, which will include an analysis of the risks associated with the activities to be performed by the Contractor, including an assessment of the risks of non-compliance or non-conformance with the Project Standards. The extent of the risk assessment required will be determined during the scope of the work development process but will include, as a minimum, a hazard identification of the EHS, community and compliance risks as set out in the SoW template.</p>	<ul style="list-style-type: none"> • Development of scope of work using SoW template • Performing risk assessment, if required 	SoW and Level 2 risk assessment (if required)

5.7.2 Key Procurement and Contractor Management Stages

A successful project should involve contractors which act similarly. The Environmental and Social performance of the Project depends on consistency of all activities. The first step of contractor procurement process is preparation of proposal in compliance with controls and commitments described in this plan. Evaluation of contractor's Environmental and Social Requirements and commitments are also involved in key procurement. By this plan, mitigation measures and performance improvement of Environmental and Social risks and impacts of the Project are aimed. In the light of this considerations, the actions to be taken for implementation of the management plan are described in this section.

Table 5-3, given below summarizes the key procurement at each stage. These are the actions undertaken by the Project to ensure that the activities are properly specified, resourced, managed and supervised to be following the Project requirements and Project Standard.

Table 5-3. Key Procurement Activities

	Qualification and Sourcing	Supplier Preparation	Mobilisation	Work Management	Review and Close Out
Actions	<ul style="list-style-type: none"> ✓ Sole Source ✓ Purchase requisition ✓ Purchase order ✓ Competitive ✓ Create SoW ✓ Risk assessment and establishment of relevant the Project contractual requirements ✓ Pre-qualification ✓ SoW issued to bidders ✓ Tender clarifications ✓ Tender evaluation ✓ Contracting ✓ Purchase order 	<ul style="list-style-type: none"> ✓ Prepare tender ✓ On the award, prepare EHSS Management Plan 	<ul style="list-style-type: none"> ✓ Send vehicles, tools, and equipment to the site for inspection ✓ Workers to attend training ✓ Provide details of supervisors and company emergency contacts 	<ul style="list-style-type: none"> ✓ Monitor work permits ✓ Supervise activities ✓ Track time and exposure hours ✓ Run pre-start meetings ✓ Ensure work is carried out safely ✓ Check and audit activities ✓ Communicate regularly 	<ul style="list-style-type: none"> ✓ Provide feedback on performance
Process Tools	<ul style="list-style-type: none"> ✓ Purchase requisition form ✓ SoW template ✓ EHS and social risk assessment ✓ The Project EHS and Social Management Plans 	<ul style="list-style-type: none"> ✓ SoW ✓ The Project Standard EHSS Requirements ✓ Template for worker, equipment & tools lists 	<ul style="list-style-type: none"> ✓ Equipment and tools lists ✓ Equipment and tools checklist 	<ul style="list-style-type: none"> ✓ Standard work ✓ Procedures ✓ Job Hazard Assessment ✓ Work permits system ✓ Regular inspection checklist 	<ul style="list-style-type: none"> ✓ Demobilization checklist after operation phase (for long-term contractors and suppliers)

5.8 Cultural Heritage Management

5.8.1 Findings

During the field visit and stakeholder interviews within the scope of the Project's environmental and social studies, no cultural heritage assets were found in the vicinity of the either Project sites.

5.8.2 Mitigation Measures in Case of Chance Finds

The company will be responsible for the management of the archaeological issues of Project site. HSE Manager will train the employees about cultural heritage and Chance Find Procedure.

HSE Manager will work with the equipment operators, if there is a construction work within the boundaries of the Project site and he will have the authority to stop the work. Operators will stop work or redirect stripping activities in case of a chance find and submit special reports of chance finds to HSE Manager. In addition to the Chance Find Procedure (see Appendix B), the Regional Board for the Conservation of Cultural and Natural Assets will decide for the requirement of a salvage excavation. The negotiations and meetings with the Regional Board on technical topics during and after the salvage excavation will be held by HSE Manager or a Consultant archaeologist.

The procedure given below that must be followed in case of encountering a chance find is based on national legislation and provisions in international standards. The significance of the archaeological finding may vary upon evaluation opinions of related museum experts.

Intangible Cultural Heritage

The Project will liaise with local authorities to identify if project activities can interfere with traditional celebrations or festivities; alternative solutions will be agreed with local authorities. Furthermore, the Project will liaise with local authorities to identify if project activities restrict access to elements of traditional culture; alternative solutions will be agreed with local authorities.

Archaeological Findings of Minor Significance

This type of archaeological findings is comprised of a finding isolated from its environment or findings in notably small sizes found by chance. In this case, Chance Find Procedure will be followed. The finding will be reported to the HSE Manager. The construction activities will be ceased in the field where the finding is discovered, and the finding will be reported to the related museum expert. After the completion of the notified relevant Museum Directorate investigation, the necessary arrangements, such as the identification of the boundaries of the archaeological

asset/site (finding), preservation by a protection band, notification of workers to prevent any physical intervention.

Archaeological Findings of Moderate Significance

This type of archaeological findings is small scale findings in groups or single findings with medium size architectural elements such as tombs. In this case, Chance Find Procedure will be followed. In order to prevent possible damage, necessary arrangements must be made to determine the boundaries of the archaeological remains to keep the construction equipment out of access.

The finding will be reported to the HSE Manager by the Project. The construction activities will be ceased in the field where the finding is discovered, and the finding will be reported to the relevant museum expert. After the completion of the notified relevant Museum Directorate investigation, required arrangements will be taken, such as the identification of the boundaries of the archaeological asset/site (finding), preservation by a protection band, and notification of workers.

Archaeological Findings of Major Significance

This type of findings is comprised of findings with great importance such as a settlement area, a tumulus, a mound or a big necropolis (wide graveyard areas with archaeological characteristic) and the construction activities must be immediately stopped, and Chance Find Procedure will be followed. This type of chance find may cover the entire construction site in such a way that the entrance and exit of the construction equipment and vehicles cannot be managed without giving any damage to the archaeological remains.

The finding will be reported to the HSE Manager of the Project. The construction activities will be ceased in the field where the finding is discovered, and the finding will be reported to the relevant museum expert by an archaeologist.

Following the completion of the investigation of the notified relevant Museum Directorate, the necessary arrangements will be taken, such as the identification of the boundaries of the archaeological asset/site (finding), preservation by a protection band, and notification of workers.

5.9 Occupational Health and Safety Management

The details of the occupational health and safety management are given in Occupational Health and Safety Management Plan (ÇİMKO-PLN-HSE-OHSMP-002) prepared for the Project. It includes the processes for:

- ✓ Approach for OHS management,

- ✓ General facility rules,
- ✓ Management of physical, chemical, biological and other hazards/impacts,
- ✓ Risk assessment studies,
- ✓ Preparation of emergency response plan and drills,
- ✓ Preparation of Annual OHS Work Plan, Annual OHS Training Plan and Annual OHS Performance Report,
- ✓ In-facility periodical controls,
- ✓ Reporting of OHS incidents/accidents and near misses,
- ✓ Corrective/preventive actions,
- ✓ PPE selection and control,
- ✓ OHS controls of contractors and suppliers,
- ✓ OHS signs and warnings,
- ✓ Violation of OHS processes,
- ✓ Monitoring, training, auditing and reporting requirements.

5.10 Community Health and Safety Management

All the Project employees, local communities and suppliers will be informed on the main security arrangements implemented and on security rules during periodical stakeholder engagement activities. Additionally, security cameras are placed in the Project site and around the access roads (if required). Security cameras will be followed simultaneously, and records will be available for 1 (one) month in case of needs.

Private security personnel are authorized for routine controls and their responsibility is to report the non-compliances to HSE Manager and Local Authorities.

Table 5-4 below presents the key management controls that will be implemented.

Table 5-4. Key Management Controls on Community Health and Safety

Topic	Project Phase Applicability	Control Description	Responsible Parties	Means of Verification
Change in traffic density impacting other road users	Operation	<ul style="list-style-type: none"> ✓ Identify and install all necessary traffic warning signage within the access roads. ✓ Prepare and provide driver safety training for drivers and operators. ✓ Develop and implement a Road Safety Awareness Programme for local communities. ✓ Maintain vehicles in periodic verification inspections will be undertaken. ✓ Set zero limit for alcoholic beverages and illegal drugs. 	<ul style="list-style-type: none"> ✓ HSE Manager ✓ SRS 	<ul style="list-style-type: none"> ✓ H&S Records ✓ Training Records
Community Engagement	Operation	<ul style="list-style-type: none"> ✓ Local communities, workers and suppliers will be informed on the main security arrangements implemented and on security rules. 	<ul style="list-style-type: none"> ✓ SRS ✓ HSE Manager 	<ul style="list-style-type: none"> ✓ Consultation minutes with stakeholders
Public Access to Project Area	Operation	<ul style="list-style-type: none"> ✓ Continue to implement measures to discourage unauthorized entry onto the Project Site, ✓ Hiring security presence and security personnel, ✓ Provide security cameras if required, ✓ Ensure that those providing security services are adequately trained in the use of force and appropriate conduct toward workers and Affected Communities. ✓ Visitor admission is required sign-in at the security gate. ✓ Recording the license plates of the visitors' and personnel's vehicles. 	<ul style="list-style-type: none"> ✓ Operational Manager ✓ HSE Manager ✓ SRS 	<ul style="list-style-type: none"> ✓ Grievance records ✓ Security records / Visitor Records
Community Health and Safety	Operation	<ul style="list-style-type: none"> ✓ Any person under the influence of alcohol or illegal drugs will not be permitted to enter the Project Site 	<ul style="list-style-type: none"> ✓ Private Security Personnel ✓ HSE Manager 	<ul style="list-style-type: none"> ✓ Security Records / Visitor Records ✓ Routine Inspections

Topic	Project Phase Applicability	Control Description	Responsible Parties	Means of Verification
		✗ Gambling, firearms, alcoholic beverages, illegal drugs, and explosives will not be permitted at the office/ Installation site.		
Life Safety	✗ Operation	✗ In case of off-site emergency, or an off-site accident (emergency case relevant to life and fire safety), which may affect the local settlements communication with local authorities given in the Emergency Response Plan will be conducted by Social Responsibility Staff under the supervision of the HSE Manager and Emergency Supervisor.	✗ HSE Manager ✗ SRS	✗ Incident Reports

6 CUMULATIVE ENVIRONMENTAL IMPACTS

Cumulative environmental impacts within the scope of the project are summarized in the table below.

Table 6-1. Cumulative Environmental Impacts Summary

Subject of the Impact	Aol	Level of Impact	Explanations
Air Quality	Close Settlements	Minor	<p>ÇİMKO has several emission chimneys in each of its Adıyaman and Narlı Cement Factories. Air emission analyzes of chimneys have been carrying out for Dust, CO_x, NO_x, SO₂, TOC and PAH in accordance with their obligations and they comply with the limit values deemed appropriate by the national legislation.</p> <p>Both facilities are not located in areas where different industries operate, such as organized industrial zones. Therefore, it is thought that the cumulative effects on air pollution will be minor.</p>
Biodiversity	Close vicinity of the Project Area	Negligible	<p>A significant cumulative impact on biodiversity is not expected due to the fact that the regions where Adıyaman and Narlı facilities are located have been exposed to high levels of anthropogenic impact due to industrialization and continuous agricultural activities for many years and the Project does not involve any construction activities.</p>
Noise	Project Area and close vicinity	Minor	<p>Since all the units in both cement factories, are located in closed areas, there is no environmental noise related to a production activity. However, noise is generated from the vehicles used within the scope of raw material supply and product delivery activities. The noise generated will also be minimized with the mitigation measures given in the relevant part of this management plan.</p>
Waste	Close Settlements	Minor	<p>Adıyaman Municipality for Adıyaman Cement Factory and Pazarcık Municipality for Narlı Cement Factory carries out the collection and disposal of domestic wastes and companies authorized by the Ministry of Environment, Urbanization and Climate Change deal with other types of waste such as hazardous waste, medical waste, recyclable waste, etc. belonging to the companies.</p> <p>There are Waste Temporary Storage Areas both in Narlı and Adıyaman Cement Factories of ÇİMKO. Therefore, no significant cumulative impacts are expected in this manner.</p>
Wastewater	Close Settlements	Minor	<p>Wastewater from the Project is given to the sewage systems of Kahramanmaraş Water and Sewage Administration and Adıyaman Water and Sewage Administration. Wastewater analyses are carried out regularly and recorded. Therefore, no significant cumulative impacts are expected in this manner.</p>

7 MONITORING

7.1 Key Performance Indicators (KPIs) and Monitoring Measures

The table below summarizes the key performance indicators and associated key monitoring measures related to environmental and social management that can be used to assess the progress and effectiveness of the management performance of the Project.

Table 7-1. Key Performance Indicators (KPIs) and Monitoring Measures

KPI Code	KPI Explanations	Target	Monitoring Frequency	Monitoring Measures	Performance for the Monitoring Period	Performance for the Previous Monitoring Period	Performance Change
Project Facility:						Monitoring Period: (month/year)	
Environmental and Social Management							
KPI-ESM-01	Percent of environment audits completed vs planned	100% of the planned environmental audits is completed	Annually	Audit Reports			
KPI-ESM-02	Percent of social audits completed vs planned	100% of the planned social audits is completed	Annually	Audit Reports			
KPI-ESM-03	Percent of environmental trainings completed vs planned	100% of the planned environmental trainings are completed	Annually	Training Records			
KPI-ESM-04	Percent of social trainings completed vs planned	100% of the planned social trainings are completed	Annually	Training Records			
KPI-ESM-05	Percent of environmental non-compliances closed	100% of environmental non-compliances is closed	Annually	Incident Register Forms			
KPI-ESM-06	Percent of social non-compliances closed	100% of social non-compliances is closed	Annually	Incident Register Forms			
KPI-ESM-07	Number of fines for environmental violations	0 (zero) fines regarding environmental violations	Annually	Environmental Fines			
KPI-ESM-08	Number of environmental incidents	0 (zero) environmental incidents	Monthly	Incident Register Forms			
Biodiversity Management							
KPI-BM-01	Number of facility-related injured/dead fauna	0 (zero) fauna is injured/dead due to facility activities	Monthly	Incident Register Forms			
KPI-BM-02	Number of grievances regarding biodiversity	0 (zero) grievance regarding biodiversity	Monthly	Grievance Records			
KPI-BM-03	Number of incidents/damages to sensitive areas	0 (zero) damage/incident to sensitive areas	Monthly	Incident Register Forms			
Stakeholder Engagement							
KPI-SEP-01	Total number of grievances	All grievances are responded in a timely manner	Monthly	Grievance Records			
KPI-SEP-02	Percent of complaints that are responded within 5 working days	All grievances are registered and started to be evaluated within 5 days	Monthly	Grievance Records/Register			
KPI-SEP-03	Percent of complaints that are closed within maximum 30 calendar days	All grievances are closed within maximum 30 calendar days	Monthly	Grievance Records/Register			
KPI-SEP-04	Percent of visitors that are received Visitor Training on general site rules	100% of the visitors are received Visitor Training	Monthly	Visitor Records			
KPI-SEP-05	Number of Social Responsibility Projects completed vs. planned	100% of the planned CSR projects are conducted.	Annually	Social Responsibility Records			
Grievance Mechanism							
KPI-GMP-01	Number of outstanding complaints and grievances opened in the month	Total number reduced year on year	Monthly	Grievance Records/Register			
KPI-GMP-02	Number of complaints and grievances opened in the month and evolution since Project start (graphic presentation),	Total number reduced year on year	Monthly	Grievance Records/Register			
KPI-GMP-03	Number of complaints grievances closed in the month	All complaints are responded and closed in a timely manner	Monthly	Grievance Records/Register			
KPI-GMP-04	Type of grievances	-	Monthly	Grievance Records/Register			
KPI-GMP-05	Percent of complaints that are responded within 5 working days	All grievances are registered and started to be evaluated within 5 days	Monthly	Grievance Records/Register			
KPI-GMP-06	Percent of complaints that are closed within maximum 30 calendar days	All grievances are closed within maximum 30 calendar days	Monthly	Grievance Records/Register			
KPI-GMP-07	Number of visitors to the facilities	All visitors will be recorded including the information of the reason for visit, etc.	Monthly	Visitor Records			

KPI Code	KPI Explanations	Target	Monitoring Frequency	Monitoring Measures	Performance for the Monitoring Period	Performance for the Previous Monitoring Period	Performance Change
Project Facility:						Monitoring Period: (month/year)	
KPI-GMP-08	Disclosure materials and feedback to communities	SRS will keep records of the types of leaflets, brochures, newsletters prepared and distributed. SRS will monitor feedback to local communities	Quarterly	Community Info System on the Website			
KPI-GMP-09	Auditing Grievance Mechanism Procedure	N/A	Annually	Annual Performance Reports			
Noise Management							
KPI-NM-01	Percent of test results compliant with legal standards (in case of complaint)	100% of the tests performed are compliant with legal standards	Annually	Test results			
KPI-NM-02	Number of tests carried out near sensitive receptors (in case of complaint)	N/A	Annually	Test results			
KPI-NM-03	Number of complaints related to noise	0 (zero) complaints regarding noise	Monthly	Grievance Records/Register			
KPI-NM-04	Percent of non-compliances which are closed	100% of the non-compliances are closed	Monthly	Incident Register Forms			
Air Quality Management							
KPI-AQM-01	Percent of test results compliant with legal standards (in case of complaint)	100% of the tests performed are compliant with legal standards	Annually	Test results			
KPI-AQM-02	Number of tests carried out near sensitive receptors (in case of complaint)	N/A	Annually	Test results			
KPI-AQM-03	Number of complaints related to air quality	0 (zero) complaints regarding noise	Monthly	Grievance Records/Register			
KPI-AQM-04	Percent of non-compliances which are closed	100% of the non-compliances are closed	Monthly	Incident Register Forms			
Waste Management							
KPI-WM-01	Non-hazardous waste generated (kg)	Measurement	Monthly	Waste Register Forms			
KPI-WM-02	Hazardous waste generated (kg)	Measurement	Monthly	Waste Register Forms			
KPI-WM-03	Percent of waste segregated	100% of the waste is segregated properly	Monthly	Waste Register Forms			
KPI-WM-04	Waste recycled (kg)	Measurement	Monthly	Waste Register Forms			
KPI-WM-05	Waste reused (kg)	Measurement	Monthly	Waste Register Forms			
KPI-WM-06	Number of complaints received regarding poor waste management affecting third parties	0 (zero) complaints regarding poor waste management	Monthly	Grievance Records/Register			
KPI-WM-07	Percent of non-compliances which are closed	100% of the non-compliances are closed	Monthly	Incident Register Forms			
Land and Soil Management							
KPI-LSM-01	Number of spills to soil/land	0 (zero) spills to land/soil	Monthly	Incident Register Forms			
Hazardous Material Management							
KPI-HMM-01	Hazardous materials used	N/A	Monthly	MSDS			
KPI-HMM-02	Hazardous materials stored at the site in a properly designed storage area	N/A	Monthly	MSDS			
Contractor Management (including Procurement and Employment)							
KPI-CM-01	Number of HSE performance assessments taken from the total supplier evaluations	N/A	Annually	Supplier Assessment Scorecards, Quality Test Results			
KPI-CM-02	Percent of unskilled staff employed from affected province(s)	100%	Monthly (if applicable), or Annually	Employment Records			
KPI-CM-03	Out of 100% unskilled staff employed from affected province, percent that is employed from affected district(s)	90%	Monthly (if applicable), or Annually	Employment Records			

KPI Code	KPI Explanations	Target	Monitoring Frequency	Monitoring Measures	Performance for the Monitoring Period	Performance for the Previous Monitoring Period	Performance Change
Project Facility:					Monitoring Period: (month/year)		
KPI-CM-04	Out of the 90% of unskilled staff employed from affected district, percent that is employed from affected village(s) / neighborhood(s)	80%	Monthly (if applicable), or Annually	Employment Records			
KPI-CM-05	Percent of semi-skilled staff employed from affected province(s)	100%	Monthly (if applicable), or Annually	Employment Records			
KPI-CM-06	Percent of semi-skilled staff employed from affected village(s) / neighborhood(s)	90%	Monthly (if applicable), or Annually	Employment Records			
KPI-CM-07	Percent of skilled staff employed from a national level	100%	Monthly (if applicable), or Annually	Employment Records			
KPI-CM-08	Number of community complaints relating to recruitment issues	0 (zero) complaints	Monthly	Grievance Records/Register			
KPI-CM-09	Percent of goods procured locally (village, district or province affected by the Facility)	N/A	Monthly (if applicable), or Annually	Procurement Records			
KPI-CM-10	Percent of services that are procured locally (village, district or province affected by the Project)	N/A	Monthly (if applicable), or Annually	Procurement Records			
KPI-CM-11	Number of complaints relating to the procurement process	0 (zero) complaints regarding the procurement process	Monthly	Grievance Records/Register			
KPI-CM-12	Number of complaints received from suppliers regarding payment for goods or services	0 (zero) complaints regarding the payment of goods/services	Monthly	Grievance Records/Register			
Cultural Heritage Management							
KPI-CHM-01	Number of known archaeological / cultural heritage sites damaged during construction activities (if applicable)	0 (zero) cultural heritage site is damaged	Monthly	Incident Register Forms			
KPI-CHM-02	Number of times work stopped by Contractors to report Chance Finds.	N/A	Monthly	Chance Finds Forms			
KPI-CHM-03	Percent of non-compliances which are closed (if applicable)	100% of the non-compliances are closed	Monthly	Incident Register Forms			
Occupational Health and Safety Management							
KPI-OHS-01	Number of the recorded worker (internal) grievances relevant to OHS	N/A	Monthly	Internal Grievance Records/Register			
KPI-OHS-02	Number of the reported OHS incidents / accidents / hazards / near misses	0 (zero) incident / accident / hazard / near misses regarding OHS	Monthly	Regular internal inspections, Incident Register Forms, Accident/Incident Reporting Forms			
KPI-OHS-03	Total number of non-compliances with the measures identified in OHSMP	0 (zero) non-compliances	Quarterly	OHS Performance Reports			
KPI-OHS-04	Percent of drills conducted vs. planned	100% of the planned drills will be conducted	Annually	Drill Reports			
KPI-OHS-05	Percent of the employees receiving OHS trainings which are planned within the Annual OHS Training Plan	100% of the employees are given the OHS trainings which are planned within the Annual OHS Training Plan	Annually	Training Records, and Annual OHS Training Plan			
KPI-OHS-06	Number of risk analysis/risk assessment	Minimize the number of risks, hazards and monitor periodically	Annually	OHS Performance Reports			

KPI Code	KPI Explanations	Target	Monitoring Frequency	Monitoring Measures	Performance for the Monitoring Period	Performance for the Previous Monitoring Period	Performance Change
Project Facility:						Monitoring Period: (month/year)	
Emergency Response							
KPI-ERP-01	Number of the reported near misses	Target: 0 (zero) per month	Monthly	Near Miss Reports			
KPI-ERP-02	Number of the reported non-compliances	Target: 0 (zero) per month	Monthly	Performance Reports & Drill Reports			
KPI-ERP-03	Number of closed/prevented non-compliances by CPAs	100% of non-compliances remedied within the defined timeframe	Monthly	CPA Records			
KPI-ERP-04	Percent of employees receiving emergency response trainings planned in Annual Training Plan	100% of the employees received Emergency Response Training at least once per year	Annually	Training Records			
Community Health and Safety Management							
KPI-CHS-01	Number of community health safety & security complaints (related to air, noise, dust, traffic etc.) from local communities	0 (zero) complaints regarding CHS and security issues	Monthly	Grievance Records/Register			
KPI-CHS-02	Number of reported traffic incidents involving community members	0 (zero) traffic incidents involving community members	Monthly	Incident Register Forms			
KPI-CHS-03	Percent of community received community safety training such as traffic safety awareness	100% of the community received community safety training	Annually	Training Records			
KPI-CHS-04	Percent of visitors received Visitor Training	100% of the visitors received Visitor Training	Monthly	Visitor Records and Visitor Training Records			
KPI-CHS-05	Percent of certification of the drivers / operations related to traffic rules and/or driving	100% of the drivers/operators received relevant driving safety trainings	Annually (if applicable)	Drivers/Operators' Certifications			

8 TRAINING

All necessary training will be provided as induction training to provide general awareness for the environment, social and HS issues. Job-specific training will be provided as necessary. All employees of the Project and subcontractors will take the following training courses, as well as "Induction Training" and "Job Specific Training" before starting their works, depending on their jobs:

- ✓ Legal HS Training,
- ✓ Vocational Legal Training,
- ✓ First Aid Training,
- ✓ Emergency Response Team members training,
- ✓ Worker's Representative training,
- ✓ H&S technical training (confined space, working at height, etc.),
- ✓ Visitor Training,
- ✓ Worker's Representatives training,
- ✓ Driving related training,
- ✓ Toolboxes,
- ✓ Other training such as:
 - Additional training for the workers who had occupational accidents or diseases to inform them about the reasons for the accident or disease, ways to protect themselves and safe working methods,
 - Refresher training before returning to work for the workers who are away from work for any reason for more than six months.

8.1 Induction Training

The induction training will provide information about general and site-specific induction to the environment, health, safety, and social issues. All employees of the Project and contractors are required to join in this training. Both management and workers will be involved this training to increase the awareness of their safety responsibilities, their role and impacts on overall E&S management, environmental concerns, and importance of respect to others and local people.

8.2 Job Specific and Other Training Requirements

All employees of the Project and the contractors working at the Project site are expected to attend routine safety briefings/toolboxes.

The worker qualifications and training records will be collected from the contractors to verify competency and manage staff competency as part of the contractor engagement processes.

9 AUDITING AND REPORTING

In this section, auditing internally and externally is involved. For the Project activities, record keeping, and reporting basics are explained.

9.1 Internal Auditing

Routine internal inspections will be carried out by HSE Manager during the operational phase regarding the proper implementation of ESMP. The conformance will be monitored in accordance with the requirements set out in this Plan. The aspects of this management plan are subject to regulatory audits.

9.2 External Auditing

The conformance with this ESMP will be subject to periodic assessment as part of the ÇİMKO audit program and separately by Project Lenders.

9.3 Record Keeping and Reporting

The records of the audits, inspections, complaints, and incidents will be reported, kept, and managed according to the Project procedures. Reporting activities for this management plan is mainly involved incidents and received grievances related to the contractor and subcontractor and their health and safety issues with investigation processes.

All incidents and non-conformances will be reported and recorded. All the grievances, concerns and suggestion raised internally or externally will be recorded through Grievance Mechanism Procedure. HSE Manager and SRS will evaluate and conclude concerns with project management in the monthly basis.

APPENDICES

Appendix A: H&S Checklist

Appendix B: Chance Finds Procedure

Appendix C: Organizational Charts of ÇİMKO

Appendix D: Aspects and Impacts Register

Appendix E: Incident Register

Appendix F: Air Quality Register

Appendix G: Noise Register

Appendix H: Minimum Documents to be Submitted by Contractors

Appendix A: H&S Checklist

 <p>İŞ GÜVENLİĞİ KONTROL LİSTESİ (HS CHECK LIST)</p>			Type of Document	
Check List				
Form ID				
Date				
Reference Document				
(Name of the previous file goes here)				
Version	01			
Edition	01			
Yüklenici/Contractor	Tarih/Date	Yapılacak iş /Work detail	Çalışma Alanı / Work Field	
No	Konu/Subject		Var(Y)	Yok(N)
1	Çalışanların nüfus kağıtları fotokopileri var mı? / Are there copies of the employee ID card?			
2	Çalışanların görev kağıtları var mı? / Do the employees have duty papers?			
3	Çalışanların mesleki yeterlilik belgeleri var mı? / Do employees have professional qualification documents?			
4	Çalışanların işyeri hekim tarafından verilmiş periyodik muayene raporu var mı? / Do employees have a periodic inspection report issued by the workplace doctor?			
5	Çalışanların temel İSG eğitim sertifikaları var mı? / Do employees have basic OHS training certificates?			
6	Çalışılacak bölgeye ait riskler ekip ile paylaşıldı mı? Kayıt edildi mi? / Were the risks of the region to be studied shared with the team? Is it registered?			
7	Ekip İSG sorumlusu personelin adı? / Name of the staff responsible for the team OHS?			
8	Çalışma izni formu doldurulmuş mu? / Is the work permit form filled?			
9	Çalışılacak bölgede gerilim var mı? Var ise özel önlemler alındı? / Is there any conflict in the area to be worked? If yes, what were the special measures taken?			
10	Toolbox yapıldı mı? / Is toolbox done?			
14	Gözlemci olarak tayin edilen personelin Adı-Soyadı-Görevi? / Name-Surname-Position of the personnel appointed as Observers?			
İşletme Sorumlusu		Kontrol Eden Ekip Şefi/Şantiye Şefi	Ekip Çalışanı	İşletme Sorumlusu
(Adı ve Soyadı)		(Adı-Soyadı-Görevi-İmza) / (Adı-Soyadı-Görevi-İmza)	(Adı-Soyadı-Görevi-İmza)	(Adı ve Soyadı)

Appendix B: Chance Finds Procedure

1. PURPOSE

The Archaeological Chance Find Procedure is prepared to provide guidance to all parties and employees regarding the actions to be taken in case of the discovery of an archeological asset.

2. SCOPE

It is likely to encounter archeological findings during the construction activities of the project. Any type of activity requiring excavation or any type of intervention on the landscape through earthworks has the potential to lead to the discovery or destroying of archeological entities.

3. PROCEDURE

Any physical remains of past human activity, including artifacts, plant, and animal remains, structural remains, and soil features are defined as archaeological entities. All actions to be carried out in case of discovery of an archaeological entity should comply with the Law on Cultural and Natural Assets Conservation Law Numbered 2863 (Law Number: 2863, Date of Approval: 21.7.1983, Publication in the Official Gazette: Date: 23/7/1983 No: 18113).

In the event of the discovery of an archaeological entity, the following procedure shall be implemented:

- ✓ All construction and other relevant activities in the vicinity of the chance find will be ceased by the HSE Manager or Consultant Archaeologist of the Project or anyone, who encounters a chance find.
- ✓ HSE Manager will contact the Operational Manager as soon as a chance find is encountered.
- ✓ HSE Manager contacts museum directorate archaeologist immediately.
- ✓ HSE Manager of the Project will properly secure chance find the site via flagging, no-entry signs, etc. and prevent/limit the vehicle traffic within the immediate vicinity of chance find and also protect the site by not moving, removing or further disturbing the chance find.
- ✓ Boundaries of discovered archaeological site coordinates will be recorded and the photograph of the location and the finding shall be taken and also video record should be made.
- ✓ The site and its vicinity will be secured against damage or loss until a final decision is made about this site by Board.

- ✓ HSE Manager of the Project will fill out Part A of Chance Find Form (*Annex A*) and send a copy to Museum archaeologist within 24 hours keeping a hard copy for the Project as a record and registering a copy to Document Control Center (DCC),
- ✓ If any human remains such as a contemporary grave or graveyard are noticed, security forces will be informed. Unless the remains are determined to be recent, the local administration (village head: mukhtar, or district governor) has the full authority.
- ✓ Further steps to be followed and proper procedures to be implemented for the management of the finding(s) (changes in the layout, conservation, preservation, restoration, or salvage) will be decided and reported in writing by the Museum Directorate.
- ✓ In case the site is considered to be of no significance by the Museum Directorate, HSE Manager will inform the Operation Manager and they will inform their managers. Subsequent of filling out Part B of Chance Find Form (*Annex A*) by HSE Manager within 24 hours while retaining a copy of the Chance Find Form as a record, the construction works will proceed since no further actions are required.
- ✓ In case the site is considered to be of significance by the Museum Directorate, HSE Manager will be informed by the Museum Directorate about the decision on further actions. HSE Manager will inform the Operation Manager and their managers. Subsequent of filling out Part B of Chance Find Form by HSE Manager within 24 hours while retaining a copy of the Chance Find form as a record, the instructions of the Museum Directorate will be followed. After some field investigation, Museum Directorate will declare their decision on the significance of the site, and the actions to be followed as per their decision are summarized in the following table.

Site to be of No Significance	Site to be of Minor Significance	Site to be of Major Significance
<ul style="list-style-type: none"> • HSE Manager will inform their managers, • HSE Manager will record the decision in Part C of Chance Find Form within 24 hours, • HSE Manager will retain a copy of Chance Find form as a record, • No further actions will be required, • This step closes out the chance find procedure, • <u>Construction activities may resume.</u> 	<ul style="list-style-type: none"> • A salvage excavation is to be completed • Museum Directorate will provide instructions, and/or supervision for salvage archaeological excavation HSE Manager, • HSE Manager will inform their managers, • Under the guidance of Museum archaeologist (following instructions from other authorities, Kahramanmaraş and Adiyaman Regional Boards, etc.), the Project will provide a team of qualified archaeologists to conduct the salvage excavation, • Once the excavation is completed, HSE Manager will provide a report to operational manager, • HSE Manager will provide a report to the Museum Directorate, • Regional Board Directorate of Protection of Cultural Heritage will officially confirm the completion of recovery and inform HSE Manager, • HSE Manager will inform the operational manager that no further actions are required, • HSE Manager will inform other managers, • HSE Manager will record the decision in Part C of Chance Find Form within 24 hours, • HSE Manager will retain a copy of Chance Find form as a record, • No further actions will be required, • This step closes out the chance find procedure • <u>Construction activities may resume.</u> 	<ul style="list-style-type: none"> • Excavation is to be completed, • The site will be treated according to "Law on the Conservation of Cultural and Natural Property (2863)", • Museum Directorate will provide instructions, and/or supervision for salvage archaeological excavation to HSE Manager, • HSE Manager will inform the operational manager and their managers, • Once the excavation is completed, HSE Manager will provide a report to operational manager, • HSE Manager will provide a report to the Museum Directorate, • Regional Board Directorate of Protection of Cultural Heritage will officially confirm the completion of recovery and inform HSE Manager, • Site will be officially recorded and protected according to Turkish regulations, • HSE Manager will inform the operational manager that no further actions are required, or that a relocation is required, • HSE Manager will inform their managers, • Consultant Archaeologist of the Project will record the decision in Part C of Chance Find Form within 24 hrs, • HSE Manager will retain a copy of Chance Find form as a record, • No further actions will be required, • This step closes out the chance find procedure, • <u>Construction activities may resume, or relocation is implemented.</u>

Annex A: Chance Find Report Form*To be filled out in English (İngilizce doldurunuz.)***PART A
BÖLÜM A**

Location: <i>Mevkii</i>	Date: <i>Tarih</i>	ID:
Name of person reporting chance find: <i>Rastlantısal buluntu rapor eden kişinin ismi</i>		
Name of contractor employee contacted: <i>İletişime geçen yüklenici çalışanı ismi</i>		
Was work stopped in the immediate vicinity of chance find? <i>Rastlantısal buluntunun tam çevresinde iş durduruldu mu?</i>	<input type="checkbox"/> Yes <i>Evet</i>	<input type="checkbox"/> No <i>Hayır</i>
Was a buffer zone created to protect chance find? <i>Rastlantısal buluntu korumak için tampon bölge oluşturuldu mu?</i>	<input type="checkbox"/> Yes <i>Evet</i>	<input type="checkbox"/> No <i>Hayır</i>
NOTIFICATION (BİLDİRİM)		
Operation Manager contacted <i>İşletme Müdürü ile irtibata geçildi</i>	<input type="checkbox"/> Yes <i>Evet</i>	<input type="checkbox"/> No <i>Hayır</i>
Project HSE Manager contacted <i>Proje Sağlık, Güvenlik ve Çevre müdürü ile iletisme geçildi</i>	<input type="checkbox"/> Yes <i>Evet</i>	<input type="checkbox"/> No <i>Hayır</i>
CHANCE FIND DETAILS (RASLANTISAL BULUNTU AYRINTILARI)		
GPS coordinates <i>GPS koordinatları</i>	Photo record <input type="checkbox"/> Yes <i>(HD quality – no cell phone photos)</i> <i>Fotoğraf kaydı Evet Hayır</i> <i>(HD kalitesinde – cep telefonu fotoğrafı değil)</i> If not, explain why: <i>Yok ise nedenini açıklayınız</i>	
	Other records <input type="checkbox"/> Yes <input type="checkbox"/> No Specify (drawings, HD quality videos, etc.): <i>Diger kayitlar Evet Hayır</i> <i>Belirtin (çizimler, HD kalite videolar, vb.)</i>	

Description of chance find:
Rastlantısal buluntuun tanımı

Description of site and vegetation: (e.g. surface sediment type, ground surface visibility, distance to closest watercourse, etc.)
Sahanın ve bitki örtüsünün tanımı: (örn. Yüzey sediman türü, yüzey zemin görünürlüğü, en yakın suyoluna olan mesafe, vb.)

PART B BÖLÜM B

NOTIFICATION OF MUSEUM DIRECTORATE ARCHAEOLOGIST (MÜZE MÜDÜRLÜĞÜ ARKEOLOĞUNA BİLDİRİ)

Project HSE Manager contacted museum directorate archaeologist

Yes

No

Proje Sağlık, Güvenlik ve Çevre müdürü müze müdürlüğü arkeoloğu ile irtibata geçti.

Evet

Hayır

Date of notification:

Bildirim tarihi

Name of museum directorate archaeologist :

Müze müdürlüğü arkeoloğunun ismi

Contact number of museum directorate archaeologist:

Müze müdürlüğü arkeoloğunun iletişim numarası

DECISION OF MUSEUM DIRECTORATE ARCHAEOLOGIST (MÜZE MÜDÜRLÜĞÜ ARKEOLOĞUNUN KARARI)

Date of initial investigation:

İlk araştırma tarihi

Site of no significance - Construction to proceed with no further investigation – End of chance find procedure

Önemsiz saha – İnşaat daha fazla araştırma yapılmadan devam edilebilir – rastlantısal buluntu prosedürün sonu.

Site of significance - Further investigation required

Önemli saha – Ek araştırma gerekmektedir

Fill out Part C
Bölüm C'yi doldurun.

Date of notice to resume work :

İşe başlama tarihi bildirisi

Name of museum directorate archaeologist:
Müze müdürlüğü arkeoloğunun ismi

Contact information:
İletişim numarası

Operation Manager contacted
İşletme Müdürü ile irtibata geçildi

Yes
Evet

No
Hayır

HSE Manager contacted
Sağlık, Güvenlik ve Çevre müdüürü ile irtibata geçildi

Yes
Evet

No
Hayır

PART C BÖLÜM C

FURTHER FIELD INVESTIGATION *(EK SAHA ARAŞTIRMASI)*

Site of no significance
Önemsiz saha

Site of minor significance
Az önemli saha

Site of major significance
Çok önemli saha

Describe additional work to be conducted:
Yapılması gereken ek işlerin tanımları

Date started:
Başlangıç tarihi

Date completed:
Bitiriş tarihi

Date of notice to resume work :
İşe başlama tarihi bildirisi

Name of museum directorate archaeologist:
Müze müdürlüğü arkeoloğunun ismi:

Contact information:
İletişim numarası

Operational manager contacted
Operasyon müdürü ile irtibata geçildi

Yes
Evet

No
Hayır

Project HSE Manager contacted
Proje Sağlık, Güvenlik ve Çevre müdüürü ile irtibata geçildi

Yes
Evet

No
Hayır

Annex B: Chance Find Register

CHANCE FIND REGISTER

Reporting Period:

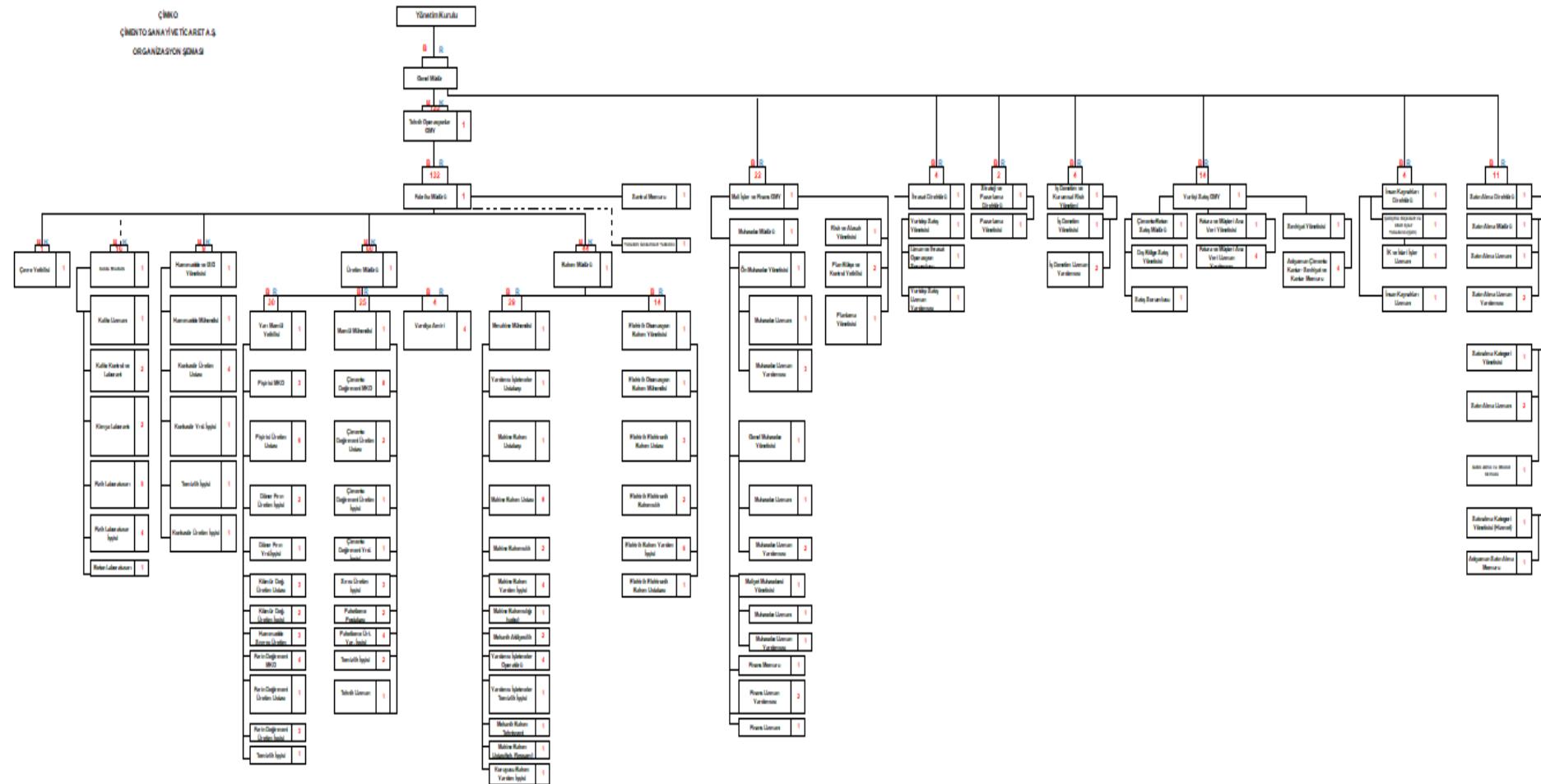
Total of chance find	
To date:	This reporting Period:

ID (*)	DATE OF CHANCE FIND	LOCATION	CHANCE FIND SUMMARY	NAME OF AUTHORITY NOTIFIED	DATE PART A COMPLETED	DATE PART B COMPLETED	DATE PART C COMPLETED	ACTION TAKEN	STATUS OPEN OR CLOSED	REMARKS
CH01										
CH02										
CH03										
CH04										

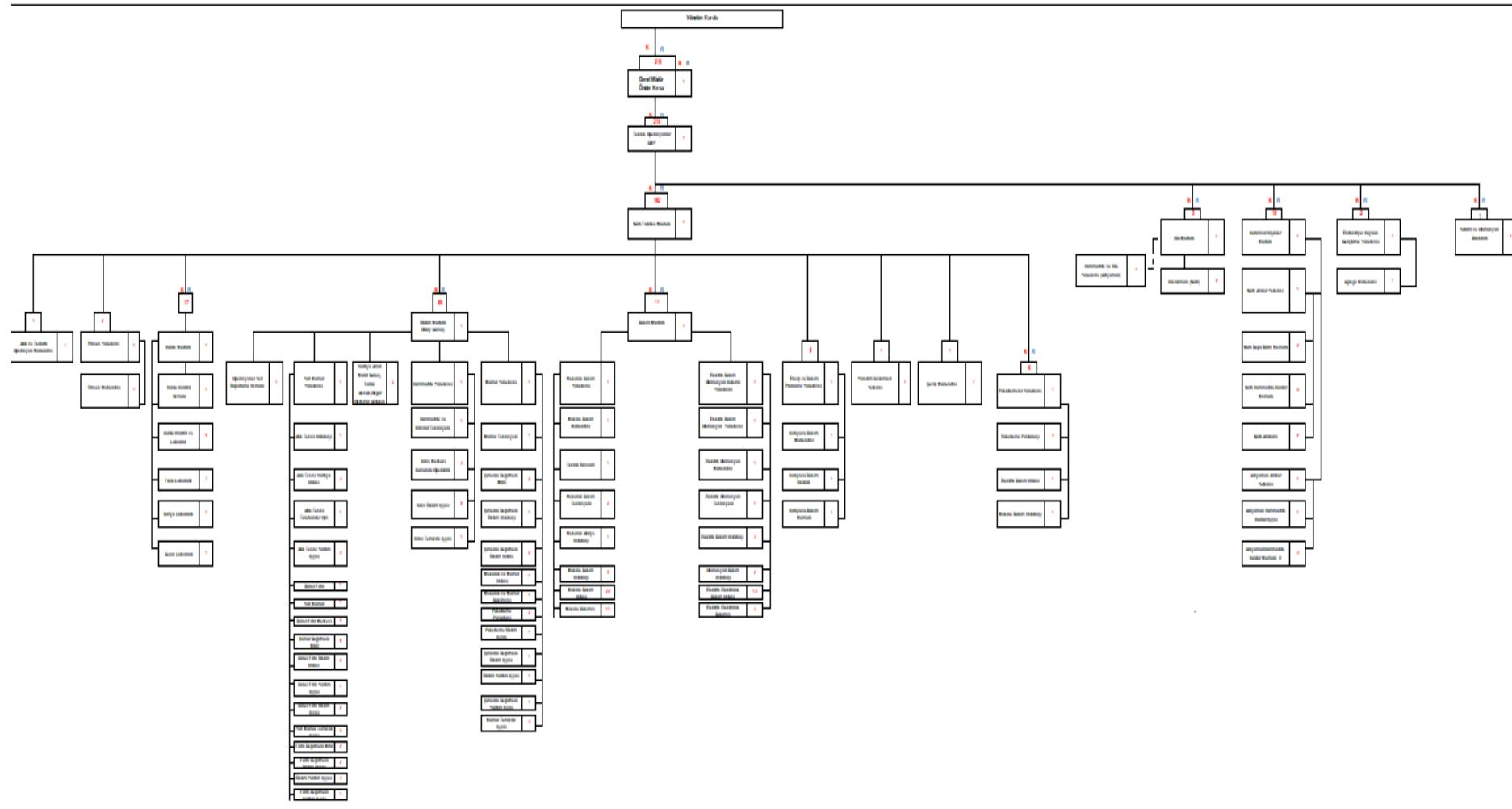
(*) Keep same ID format

Appendix C: Organizational Charts of ÇİMKO

Organizational Chart of Adiyaman Cement Factory



Organizational Chart of Narlı Cement Factory



Appendix D: Aspects and Impacts Register

Appendix E: Incident Register Form

INCIDENT REGISTER								
Reporting Period:								
Total of Incidents								
To date	This Reporting Period							
Total of Incidents to date								
Open	Closed							
Date Raised	Registration Number	Location	Incident Summary	Actions		Close Out		Comments
				Corrective Actions	Actionee	To Close by	Actual Close our Date	

Appendix F: Air Quality Register

AIR QUALITY REGISTER							
Location	Date Sample Taken	Sample No	Sampled by	Parameters			
				Dust	PM10	Heavy Metal	SO ₂
							NO ₂ / NO _x

Appendix G: Noise Register

NOISE REGISTER											
Reporting Time:											
Location	Date Sample Taken	Sampled by	Parameters								
			Meteorological Conditions				TNR parameters			IFC Parameters	
							LAeq (dBA)			LAeq (dBA)	
							Limits			Limits	
			Wind direction	Wind speed	Temperature	Humidity	Day Time (07:00 – 19:00)	Evening Time: (19:00 – 23:00)	Night Time (23:00 – 7:00)	Day Time (07:00-22:00)	Night Time (22:00-7:00)
							70	65	60	55	45

Appendix H: Minimum Documents to be Submitted by Contractors

LIST OF DOCUMENTS TO BE SUBMITTED BY THE CONTRACTORS	
DOCUMENT	STATUS
Social Security Records	
Risk Assessment	
Emergency Response Plan (ERP),	
Medical Records	
Training Certificates of The Workers	
Equipment Database and Related Documents	



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