



ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN
MARCH 2024
CNR-PLN-ERZ-ESMP-001
Final



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ABBREVIATIONS/DEFINITIONS

AIIB	Asian Infrastructure Investment Bank
ÇINAR	Çınar Engineering Consultancy Inc.
CLO	Community Liaison Officers
Covid-19	Coronavirus Disease-2019
e.g.	exempli gratia (for example)
EHS	Environmental, Health, and Safety
EIA	Environmental Impact Assessment
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
etc	<i>et cetera</i> (and others)
GBV	Gender Based Violence
GIIP	Good International Industry Practices
GM	Grievance Mechanism
HATSU	Hatay Water and Sewerage Administration
HSE	Health, Safety, and Environment
IC İÇTAŞ	IC İÇTAŞ Solar Energy Production and Trade Inc.
IFC	International Finance Corporation
IFIs	International Financial Institutions
MENR	Ministry of Energy and Natural Resources
MH	Republic of Türkiye Ministry of Health
MoEUCC	Ministry of Environment, Urbanization, and Climate Change
No	Number
OG	Official Gazette
OHS	Occupational Health and Safety
PAP	Project Affected Person
Project Owner/Client	IC İÇTAŞ Solar Energy Production and Trade Inc..
PS	Performance Standard
RCA	Root Cause Analysis
SEA /SH	Sexual Exploitation and Abuse and Sexual Harassment
SEP	Stakeholder Engagement Plan
SPP	Solar Power Plant
WBG	World Bank Group
WHO	World Health Organization
WWMP	Wastewater Management Plan
YEKA	Renewable Energy Resources Zones



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APPENDICES

Appendix-1 Project Area Coordinates

Appendix-2 Pre-license Document (Date: 01.09.2022, No: ÖN/11159-19/05221)

Appendix-3 General Layout Plan

Appendix-4 Letter on Water Supply

Appendix-5 Letter on Wastewater Removal by Vacuum Trucks

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1 INTRODUCTION

The Ministry of Energy and Natural Resources (MENR) sets forth their main strategies and policies in terms of renewable energy resources as to ensure the diversity of resources by prioritizing domestic resources, to increase the share of renewable energy resources in energy supply, to bring full functionality to free-market conditions, to improve the investment environment and to increase energy efficiency. In consideration of these strategies and policies, a government-supported initiative, YEKA (Renewable Energy Resources Zones) program was launched in 2016 with the objective to encourage the development of renewable energy projects, particularly wind and solar power. It was initiated together with the enforcement of "Regulation on Renewable Energy Resources Zones" published in the Official Gazette dated 09.10.2016 and numbered 29852.

In the scope of YEKA program, the General Directorate of Energy Affairs of MENR identifies specific areas of land that are suitable for the development of renewable energy projects and invites companies to the competitions to bid for the right to develop and operate these projects.

The competition announcement of 4th YEKA for solar power plants in Erzin District of Hatay Province and Viranşehir District of Şanlıurfa Province (YEKA G-4) was published in the Official Gazette dated April 29, 2022, and numbered 31824 and it covered the allocation of 700 MWe of connection capacity for the construction of 12 solar power plants (SPPs).

The competition was held on June 28, 2022, via "YEKA Oriented Connection Capacity Allocation Method" and "Allocation Method for Use of Domestic Goods". YEKA G4-Erzin-2 SPP was won by IC İÇTAŞ Energy Investment Holding Inc. (the Client) and YEKA Usage Right Contract was signed on August 8, 2022 with MENR. After obtaining the Preliminary License certificate, the Project was transferred from IC İÇTAŞ Energy Investment Holding Inc. to IC İÇTAŞ Solar Energy Production and Trade Inc. (the Client).

YEKA G4-Erzin-2 SPP Project (the Project) to be implemented by IC İÇTAŞ Solar Energy Production and Trade Inc. will have a total installed power of 140 MWm/100 MWe (140 MWdc/100 MWac) and an annual electricity production of 200,000,000 kWh. The intention of the Project is to significantly contribute to a renewable and zero-carbon supply of electricity to the national grid, contribute to Türkiye's energy transition, and help in meeting the rising demand for electricity in Türkiye.

The Project is evaluated as per the Environmental Impact Assessment (EIA) Regulation (Official Gazette dated July 29, 2022, and numbered 31907) and the activities under this Project are included in Annex-1 of the EIA Regulation. Accordingly, a national EIA Report has been prepared by ÇINAR Engineering Consultancy Inc. ("ÇINAR" or "ESIA Consultant") and submitted to the Ministry of Environment, Urbanization and Climate Change (MoEUCC) on January 3, 2023. As for the Project, an "EIA Positive" decision (Certificate No: 7100) was acquired from MoEUCC on May 10, 2023.

The Client plans to apply to international financial institutions (IFIs) for financing of the Project and this Environmental and Social Assessment Report (ESIA) is prepared with the intention to meet the requirements of the national legislation, as well as IFIs. Therefore, the Client contracted with ÇINAR Engineering and Consulting Inc. ("ÇINAR" or "ESIA Consultant") in February 2023 to undertake an ESIA study of the Project. The Environmental and Social studies have been prepared in line with IC İÇTAŞ Solar Energy Production and Trade Inc. (Project Owner, IC ICTAS) and regarding IFC Performance Standards, Asian Infrastructure Investment Bank (AIIB) Environmental and Social Framework (ESF) Environmental and Social Standards (ESSs), Turkish regulatory framework, WBG/IFC General and relevant Sector Specific EHS Guidelines, and other applicable Good International Industry Practices (GIIP).



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Within the scope of ESIA studies, ÇINAR has prepared an ESIA Package shown in the Table 1.

Table 1. Documents Prepared within the Scope of the Project

Document Name	Document Code
Environmental and Social Impact Assessment (ESIA)	CNR-REP-ERZ-ESIA-001
Environmental and Social Management Plan (ESMP)	CNR-PLN-ERZ-ESMP-001
Stakeholder Engagement Plan with Grievance Mechanisms (SEP with GM)	CNR-PLN-ERZ-SEP-001
Land Acquisition and Resettlement Action Plan (LARAP)	CNR-PLN-ERZ-LARAP-001
Biodiversity Action Plan and Biological Monitoring Plan (BAP and BMP)	CNR-PLN-ERZ-BAP-001 CNR-PLN-ERZ-BMP-001
Waste Management Plan	CNR-PLN-ERZ-WMP-001
Wastewater Management Plan	CNR-PLN-ERZ-WWMP-001
Community Health and Safety Management Plan	CNR-PLN-ERZ-CHSMP-001
Occupational Health and Safety Management Plan	CNR-PLN-ERZ-OHSMP-001
Cultural Heritage Management Plan & Chance Find Procedure	CNR-PLN-ERZ-CHMP-001 CNR-PLN-ERZ-CFP-001
Emergency Preparedness and Response Plan / Emergency Action Plan	CNR-PLN-ERZ-EPRP-001
Greenhouse Gas Emissions Reduction Plan /Climate Change Risk Management Plan	CNR-PLN-ERZ-CCRMP-001
Labor Management Plan	CNR-PLN-ERZ-LMP-001
Traffic Management Plan	CNR-PLN-ERZ-TMP-001
Dust Control Management Plan	CNR-PLN-ERZ-DCMP-001

In the ESIA process, the necessary environmental and social risks and impacts arising from the Project have been assessed, and necessary measures have been introduced to manage impacts in accordance with national legislation, international standards and guidance documents, and through the adoption of GIIP. The ESIA Report consists of the following key components, each of which is described in detail:

- Description of the project
- Institutional and legal framework
- Methodological approach of impact assessment
- Environmental and social baseline, impact assessment
- Cumulative Impact Assessment,
- Environmental and social management system

ESMP, which is one of the documents submitted within the scope of the ESIA package, describes the measures and controls developed in line with the mitigation hierarchy for the management of the impacts identified during the impact assessment process, determines the implementation schedule, roles and responsibilities, reporting and monitoring requirements. Each of the management plans included in the annexes of the ESMP, defines in detail the environmental and social mitigation measures and management controls to be implemented in order to ensure compliance with the Project Standards presented under the ESIA Report on relevant environmental and social issues.

ESMP is a document that is open to regular review and update due to changes in environmental and social conditions as the project progresses. IC ICTAS and all contractors / sub-contractors are responsible for the implementation of the ESMP, and the general principles presented within the scope of the ESMP, as well as for the implementation of more detailed plans and procedures.



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1.1 Objectives and Scope

The purpose of ESMP is to provide a general framework for the Environmental and Social Management System (ESMS) planned to be implemented within the scope of the Project, and to provide the necessary management tools to ensure compliance with the Project standards in achieving the environmental and social objectives set within the scope of ESIA. Besides the legal and institutional requirements for the successful implementation of the relevant management plans, ESMP also determines the roles and responsibilities of Project Owner and the contractor/sub-contractors. The main objectives of ESMP are as follows:

- To provide an overview of the environment, health and safety (EHS), socio-economic and cultural heritage policies, standards and legal legislation that the Project is obliged to comply with,
- To determine the roles and responsibilities of Project Owner and contractors to ensure compliance with EHS requirements during the construction phase of the project,
- To ensure that construction activities are properly checked to ensure that the Project is in compliance with EHS policies, standards and legal regulations;
- Ensure reporting systems are developed and streamlined to deliver EHS compliance performance;
- Enabling ongoing development and EHS compliance coverage.

1.2 Project Description

1.2.1 Project Overview

G4-Erzin-2 SPP Project is planned to be developed and operated by IC İçtaş Energy Investment Holding Inc. in Hürriyet Neighbourhood, Erzin District, Hatay Province on Block No.639/Lot1 on an area of 199.9552 ha.

The Project was won by the Client via the “YEKA-Oriented Connection Capacity Allocation Method” during the competition held on June 28, 2022 by MENR in consideration of the principles of Regulation on Renewable Energy Resource Areas published in the Official Gazette dated October 9, 2016 numbered 29852. YEKA Usage Right Contract was signed between the Client and MENR on August 8, 2022. The license term of the Project is 30 years.

For the planned Project, it is aimed to install a SPP with a total installed power of 140MWm/100 MWe (140 MWdc/100 MWac) and an annual electricity production of 200,000,000 kWh is planned within the “Preliminary License” dated September 1, 2022 and numbered ÖN/11159-19/05221 that is prepared by the Energy Market Regulatory Authority (EMRA) (see Appendix-2).

Within the scope of the project, direct current (DC) to be produced in the photovoltaic panels to be installed at SPP will be collected in the combiner boxes and converted into alternating current (AC) by inverters. Electrical energy to be generated will be first transferred to the transformer, then to the existing switchyard and will be supplied to the interconnected system. In selection of the SPP area by MENR, the considered criteria are proximity of the area to the connection lines, high solar potential of the region, their distance to and/or coincidence with mining areas, geothermal water resources, surface water, etc.

The expected number of recruitment during the construction phase is 80, whereas it is 20 for the operation phase of the Project. The economic lifetime of the Project is 30 years. However, the license term can be extended owing to the technological improvements.



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1.2.2 Technical Properties

The main components of the Project consist of the following:

- Photovoltaic (PV) Modules
- Mounting Structures
- Inverters
- Cabling
- Transformers
- Energy Transmission Lines
- Connection Road and Internal Road
- Administrative Building, Control Centre and Social Area
- Switchyard

1.2.3 Project Area

The project area is within the boundaries of Block 639, Lot 1 in Hürriyet Neighbourhood, Erzin District of Hatay Province located at the southern region of Türkiye. The total area of the project site is 199.9552 ha.

Project area and distances to the residential areas and the industrial facilities is provided in Table 2 and shown in Figure 1. The access to the project area is via E91 Adana-Toprakkale-İskenderun and D817 Adana-İskenderun highways. The closest road section to the project area is Ceyhan İskenderun Highway District 1.

Table 2. Distance of the Project Area to the Residential Areas and The Industrial Facilities

Residential Areas / Industrial Facilities	Distance* (km)	Direction as per Project Area
Osmaniye Organized Industrial Zone (OIZ)	3	North
Yeşiltepe Village	0.5	East
Yukarıburnaz Neighborhood	3.3	Southwest
Aşağıburnaz Neighborhood	5	Southwest
Hürriyet Neighborhood	6.2	Southeast
Erzin District	8.4	Southeast

*The distances are given as approximate straight-line distances.

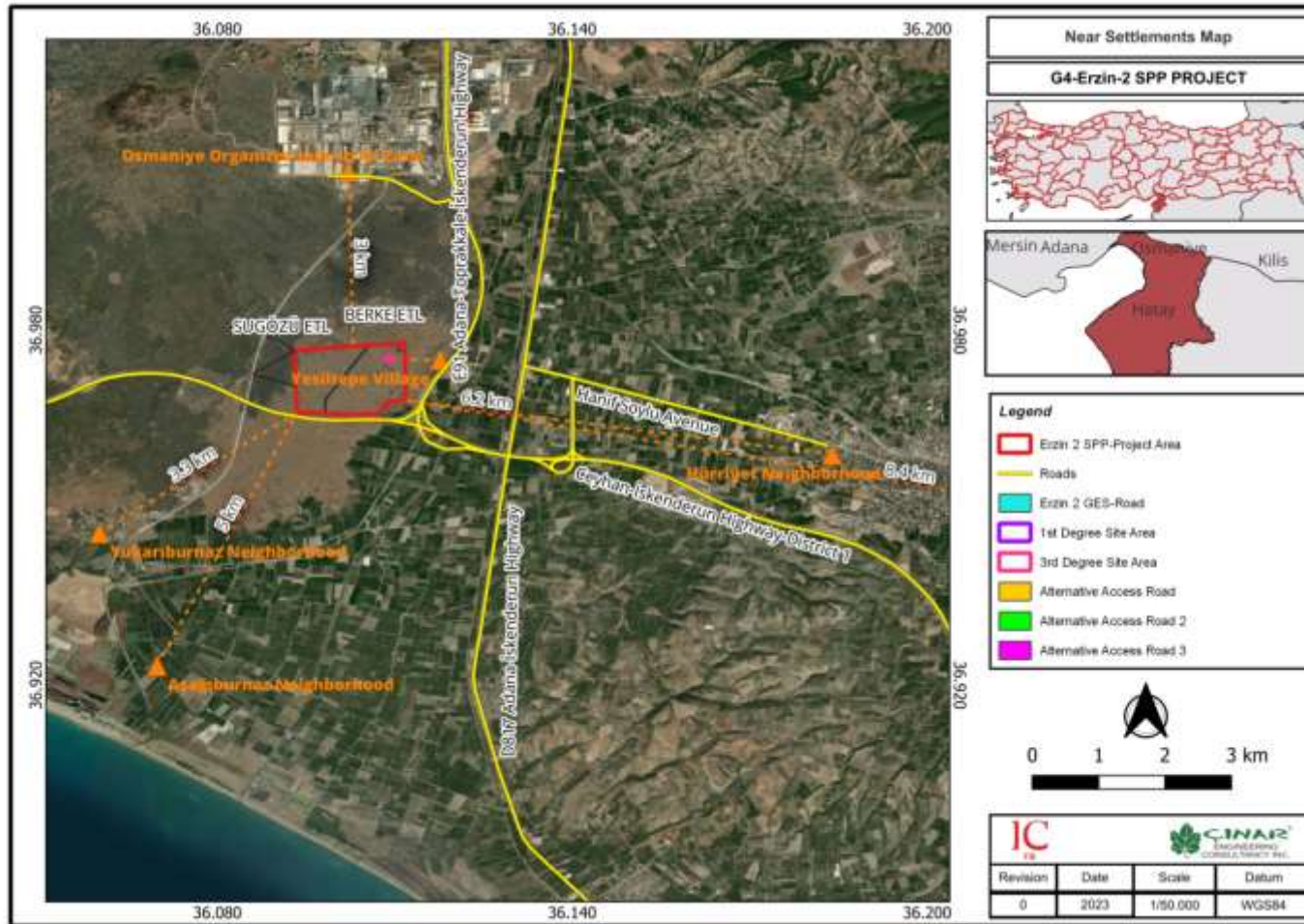


Figure 1. Project Area and Distances to Residential Areas

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2 THE MAIN COMPONENTS OF THE SPP APPLICABLE ENVIRONMENTAL AND SOCIAL STANDARDS

2.1.1 International Standards

International financial institutions follow certain policies and procedures regarding assessment and management of environmental and social impacts of the projects to be financed. As requirements of international extent of the Project, environmental and social database and impact assessment studies will also guarantee that Project's design, construction and operation will be satisfactory for international environmental standards alongside national legislation.

As AIIB is the lender within the scope of the project, the project must comply with the National Legislation as well as good international practice including IFC PSs, AIIB ESF and ESSs, EHS Guidelines and best practice documents.

In projects financed by AIIB, policies that identify, prevent and minimize harm to people and the environment are used to ensure that people and the environment are protected from potential negative impacts.

Certain environmental and social risks need to be assessed in order to receive AIIB's support.

IFC has established Environmental and Social Performance Standards to define its customers' responsibilities for managing their environmental and social risks. Throughout the investment period, the borrower must comply with these standards. The IFC Performance Standards (2012) (IFC PSs) are listed below:

- PS1: Assessment and Management of Environmental and Social Risks and Impacts
- PS2: Labor and Working Conditions
- PS3: Resource Efficiency and Pollution Prevention
- PS4: Community Health, Safety and Security
- PS5: Land Acquisition and Involuntary Resettlement
- PS6: Conservation of Biodiversity and Sustainable Management of Living and Natural Resources
- PS7: Indigenous Peoples
- PS8: Cultural Heritage

In addition, new environmental and social policies called Environmental and Social Framework (ESF) were amended by AIIB in November 2022. ESF reinforces the AIIB's commitment to sustainable development through ten Environmental and Social Standards (ESSs) designed to support Client's environmental and social (E&S) risk management. ESF enables clients to better manage project risks and improve environmental and social performance, consistent with good international industry practice (GIIP).

Environmental and Social Standards (ESSs) of AIIB are listed below:

- ESS1: Environmental and Social Assessment and Management
- ESS2: Land Acquisition and Involuntary Resettlement
- ESS3: Indigenous People (not applicable to this Project)

2.1.2 National Laws and Regulations

The National Legislation applicable to the management of environmental, social, health and safety aspects of the proposed Project has been identified under this section.



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Turkish Environmental Law No. 2872, which was issued in the Official Gazette No. 18132 on August 11, 1983, describes the fundamental principles required to protect the environment in accordance with sustainable development and sustainable environmental goals. The Environmental Law provides a legal framework for the development of environmental regulations in accordance with national and international standards. Following its first publication date of 1983, various amendments have been made.

In addition to Environmental Law and associated regulations, several laws in relation with environmental protection, pollution prevention and control, the human rights and safety are listed below:

- Agricultural Reform Law on Land Rearrangement in Irrigated Areas (Law No: 3083)
- Expropriation Law (Law No: 2942)
- Forestry Law (Law No: 6831)
- Groundwater Law (Law No: 167)
- Labor Law (Law No: 4857)
- Occupational Health and Safety Law (Law No: 6331)
- Law on Conservation of Cultural and Natural Assets (Law No: 2863)
- Law on Soil Conservation and Land Use (Law No: 5403)
- Mining Law (Law No: 3213)
- Municipality Law (Law No: 5393)
- National Parks Law (Law No: 2873)
- Pasture Law (Law No: 4342)
- Public Health Law (Law No: 1593)
- Settlement Law (Law No: 5543)
- Highway Traffic Law (Law No: 2918)
- Electricity Market Law (Law No: 6446)
- Energy Efficiency Law (Law No: 5627)

Environmental regulations, by-laws and communiques that are valid within the above-mentioned laws are listed below, including but not limited to the following:

General

- Regulation on Environmental Impact Assessment (Official Gazette dated 29.07.2022 and numbered 31907)
- Regulation on Environmental Permits and Licenses (Official Gazette dated 10.09.2014 and numbered 29115)
- Regulation on Environmental Audit (Official Gazette dated 12.06.2021 and numbered 31509)
- Regulation Concerning Environmental Management Services (Official Gazette dated 01.11.2022 and numbered 32000)
- Law on Measures to be taken and Aids to be provided for the Disasters Effective in Public Life (dated 15.05.1959 and numbered 7269).

Nature Protection

- Regulation on the Procedures and Principles Regarding the Protection of Game and Wild Animals and Their Lives; Pest Control (Official Gazette dated 24.10.2005 and numbered 25976)
- Regulation on the Conservation of Wetlands (Official Gazette dated 04.04.2014 and numbered 28962)



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- Regulation on the Procedures and Principles Relating to Animal Grassing on Grasslands and Winterwards in Forests and in the Forest (Official Gazette dated 11.07.2012 and numbered 28350)
- Land Hunting Law No. 4915 (Official Gazette dated 11.07.2003 and numbered 25165)
- National Parks Law No. 2873 (Official Gazette dated 11.08.1983 and numbered 18132)
- Environment Law No. 2872 (Official Gazette dated 11.08.1983 and numbered 18132) and all relevant Regulations
- Law No. 2863 on Conservation of Cultural and Natural Entities (Official Gazette dated 23.07.1983 and numbered 18113)
- Red Data Book for Turkish Bird Species (Kiziroglu, 2008)
- Central Hunting Commission (MAK) Decisions of Türkiye

Soil Quality

- Regulation on the Control of Soil Pollution and Lands Polluted by Point Sources (Official Gazette dated 08.06.2010 and numbered 27605)

Climate Change

- Regulation on Minimization of Ozone Depleting Substances (Official Gazette dated 07.04.2017 and numbered 30031)
- Regulation on Monitoring of Green House Gas Emissions (Official Gazette dated 17.05.2014 and numbered 29003)

Water Quality

- Regulation on Surface Water Quality (Official Gazette dated 30.11.2012 and numbered 28483)
- Regulation on Water Pollution Control (Official Gazette dated 31.12.2004 and numbered 25687)
- Regulation Concerned Water Intended for Human Consumption (Official Gazette dated 17.02.2005 and numbered 25730)
- Regulation on Urban Wastewater Treatment (Official Gazette dated 08.01.2006 and numbered 26047)
- Regulation Concerning Protection of Groundwater against Pollution and Deterioration (Official Gazette dated 07.04.2012 and numbered 28257)
- Monitoring of Surface and Groundwater Regulation (Official Gazette dated 11.02.2014 and numbered 28910)
- Regulation on Fishery Products (Official Gazette dated 10.03.1995 and numbered 22223)

Waste Management

- Regulation on Control of Packaging Wastes (Official Gazette dated 26.06.2021 and numbered 31523)
- Regulation on Waste Management (Official Gazette dated 02.04.2015 and numbered 29314)
- Regulation on the Control of Excavation Soil, Construction and Demolition Wastes (Official Gazette dated 18.03.2004 and numbered 25406)
- Regulation on the Control of Medical Wastes (Official Gazette dated 25.01.2017 and numbered 29959)
- Regulation on the Control of Waste Oils (Official Gazette dated 21.12.2019 and numbered 30985)



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- Regulation on the Control of Waste Vegetable Oils (Official Gazette dated 06.06.2015 and numbered 29378)
- Regulation on the Control of Waste Batteries and Accumulators (Official Gazette dated 31.08.2004 and numbered 25569)
- Regulation on the Control of End-of-Life Tires (Official Gazette dated 25.11.2006 and numbered 26357)
- Regulation on Mining Wastes (Official Gazette dated 15.07.2015 and numbered 29417)
- Regulation on the Landfill of Wastes (Official Gazette dated 26.03.2010 and numbered 27533)
- Regulation on the Control of Waste Electrical and Electronic Equipment (Official Gazette dated 26.12.2022 and numbered 32055)
- Notice on Fuel, Auxiliary Fuel and Alternative Raw Material Derived from Waste (Official Gazette dated 20.06.2014 and numbered 29036)
- Regulation on the Control of End-of-Life Vehicles (Official Gazette dated 30.12.2009 and numbered 27448)
- Regulation on Zero Waste (Official Gazette dated 12.07.2019 and numbered 30829)

Air Quality

- Regulation on the Control of Industrial Air Pollution (Official Gazette dated 03.07.2009 and numbered 27277)
- Regulation on the Assessment and Management of Air Quality (Official Gazette dated 06.06.2008 and numbered 26898)
- Regulation on Control of Odor Causing Emissions (Official Gazette dated 19.07.2013 and numbered 28712)
- Regulation on the Control of Exhaust Gas Emissions (Official Gazette dated 11.03.2017 and numbered 30004)

Management of Chemicals

- Regulation on Classification, Labelling and Package of Materials and Mixtures (Official Gazette dated 11.12.2013 and numbered 28848)
- Regulation on Safety Information Forms on Hazardous Substances and Mixtures (Official Gazette dated 13.12.2014 and numbered 29204).
- Regulation Regarding Transport of Hazardous Materials on Railways (Official Gazette dated 16.07.2015 and numbered 29418)
- Regulation Regarding Transport of Hazardous Materials on Highways (Official Gazette dated 18.06.2022 and numbered 31870)

Health, Safety and Labor

- Regulation on Health and Safety Risk Assessment (Official Gazette dated 29.12.2012 and numbered 28512)
- Regulation on Occupational Health and Safety Services (Official Gazette dated 29.12.2012 and numbered 28512)
- Regulation on Duties, Authority, Responsibilities and Trainings of Occupational Health and Safety Specialists (Official Gazette dated 29.12.2012 and numbered 28512)
- Regulation on the Occupational Health and Safety Committees (Official Gazette dated 18.01.2013 and numbered 28532)
- Regulation on the Health and Safety Measures to be taken in Workplace Buildings and Additions (Official Gazette dated 17.07.2013 and numbered 28710)



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- Regulation on the Tasks, Authority, Responsibility and Education of On-Site Doctor and Other Health Personnel (Official Gazette dated 20.07.2013 and numbered 28713)
- Regulation on Manual Handling (Official Gazette dated 24.07.2013 and numbered 28717)
- Regulation on Protection of Buildings from Fire (Official Gazette dated 19.12.2007 and numbered 26735)
- Regulation on the Emergency Cases in Workplaces (Official Gazette dated 18.06.2013 and numbered 28681)
- First Aid Regulation (Official Gazette dated 29.07.2015 and numbered 29429)
- Regulation on Protection of Workers from Dangers of Explosive Environments (Official Gazette dated 30.04.2013 and numbered 28633)
- Regulation on Machinery Safety (Official Gazette dated 03.03.2009 and numbered 27158)
- Law on the Protection of Life and Property (No. 4922)
- Communique on Hazard Classes List related to Occupational Health and Safety (Official Gazette dated 26.12.2012 and numbered 28509)
- Regulation Concerning the Protection of workers from Risks Associated with Noise (Official Gazette dated 28.07.2013 and numbered 28721)
- Regulation Concerning the Protection of workers from Risks Associated with Vibration (Official Gazette dated 22.08.2013 and numbered 28743)
- Regulation on Health and Safety Conditions in the Use of Work Equipment (Official Gazette dated 25.04.2013 and numbered 28628)
- Regulation on Occupational Health and Safety on Construction Works (Official Gazette dated 05.10.2013 and numbered 28786)
- Regulation on Health and Safety Regarding Temporary and Time Limited Works (Official Gazette dated 23.08.2013 and numbered 28744)
- Regulation on Health and Safety Precautions Regarding Working with Chemicals (Official Gazette dated 12.08.2013 and numbered 28733)
- Regulation on Health and Safety Signs (Official Gazette dated 11.09.2013 and numbered 28762)
- Regulation on Dust Management (Official Gazette dated 05.11.2013 and numbered 28812)
- Regulation on Safety Information Forms Regarding Hazardous Materials and Mixtures (Official Gazette dated 13.12.2014 and numbered 29204)
- Regulation on Personal Protection Equipment (Official Gazette dated 01.05.2019 and numbered 30761)
- Regulation on Vocational Training of the Employees Working in Dangerous and Highly Dangerous Workplaces (Official Gazette dated 13.07.2013 and numbered 28706)
- Regulation on the Control of Polychlorinated Biphenyl and Polychlorinated Terphenyls (Official Gazette dated 27.12.2007 and numbered 26739)
- Regulation on Usage of Personal Protective Equipment in Workplaces (Official Gazette dated 02.07.2013 and numbered 28695)
- Regulation on the Provisions of Occupational Health and Safety Training of Employees (Official Gazette dated 29.12.2012 and numbered 28512)
- Regulation on Transportation of Explosives via Highways (Official Gazette dated 24.04.2019 and numbered 30754),
- Act on the Procedures and Principles on Manufacture, Import, Transportation, Storing, Sales, Usage, Disposal and Control of Explosive Materials, Hunting

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Equipment and Similar Exempted from Monopoly (Official Gazette dated 29.09.1987 and numbered 19589)

Noise

- Regulation on Assessment and Management of Environmental Noise (Official Gazette dated 04.06.2010 and numbered 27601)
- Regulation on Environmental Noise Emission Caused by Equipment Used Outdoors (Official Gazette dated 30.12.2006 and numbered 26392)

Social

- Regulation on the Implementation of Law Concerning Private Security Services (Official Gazette dated 07.10.2004 and numbered 25606)
- Law on Right to Information (Law No: 4982)

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3 ROLES AND RESPONSIBILITIES

In this section, roles and responsibilities regarding the implementation of this ESMP and other sub-management plans are represented.

The Project-level organizational structure both for construction and operation phase are given in the following Figure 2 and Figure 3.

As seen in the figures, the management will be based at the Headquarters Environmental and Social Management unit, however there will be personnel assigned for the E&S and OHS issues at the project site.

Headquarters Environmental Health and Safety (EHS) Team

- Formed by Environmental Chief/Social Responsible, Corporate Communication Department Assistant Manager and QMS Manager/OHS Management.
- Owner and confirmatory of this plan,
- Ensures provision of adequate resources for implementation of this plan, and
- Controls and confirms implementation of this plan at a corporate managerial level.
- Implements this Plan and updates it whenever necessary,
- Ensures Facility operations are carried out in accordance with this Plan's requirements,
- Ensures realization of waste management related internal audits / controls, identification of possible shortcomings / non-compliances, and implementation of relevant corrective actions,
- Controls and audits the compliance of subcontractors and service providers to this Plan's requirements,
- Keeps all kinds of records relevant to this Plan,
- Follows legislative requirements applicable to this Plan,
- Ensures realization of monitoring requirements of this Plan,
- Provides and/or arrange provision of trainings within the scope of this Plan.

Headquarters Environmental Chief / Social Responsible

According to the management organizations of the construction and operation phase of the Project, project-site Environmental Responsible directly reports to Environmental Chief / Social Responsible. The Environmental Team consists of which is practically responsible for environmental issues including waste management, and which comprises individuals such as Project site Environmental Responsible (and Contractor E&S Staff for the construction phase), which are the coordination with the Environmental Chief / Social Responsible. Therefore, as a lead of the Environment Team, the roles and responsibilities of the Environmental Chief / Social Responsible are listed below:

- In collaboration with the project-site Environmental Responsible (and Contractor's E&S Staff for the construction phase), provides adequate resources for implementation of this plan,
- Ensures implementation of this Plan in accordance with Project Standards,
- Ensures provision of relevant trainings within the scope of this plan,
- Ensures review and update of this plan as required, and
- Ensures compliance of subcontractors and service providers to this Plan's requirements.



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Social Team

Social team consists of Environmental Chief / Social Responsible, Corporate Communication Department Assistant Manager at the Headquarters, and Project-site Social Responsible (and Contractor's E&S Staff for the construction phase), and their main duties are as follows:

- Manages and implements the social issues indicated in this Plan,
- Manages the grievance mechanism,
- Keeps records relating to grievances received and their resolution,
- Conducts regular inspections of grievance mechanism,
- Reports to the Headquarters E&S Management on the performance of the implementation of the social aspects of this Plan.

Project Site Environmental and Social Management System Personnel

- Project site ESMS personnel consists of Environmental Responsible, Social Responsible (and Contractor's E&S Staff for the construction phase) for the environmental and social implementation of the plan; and it includes JHSU Service for Occupational Physician and Occupational Safety Specialist (as well as Contractor's HS Staff during the construction phase) for the OHS issues.
- Project site ESMS personnel are responsible for the site-based implementation of the tasks in the ESMP and other sub-management plans, for which they have been assigned to perform.
- Project site ESMS personnel are responsible for reporting the Project site's environmental, social and health and safety performance, incidents, accidents, etc. to the relevant chief/manager at the Headquarters E&S Management unit.

Employees

- Responsible for complying with and implementing the requirements of this plan.
- Responsible for participating in relevant trainings designated for them in this plan.
- Responsible for complying with all measures and rules listed under the Emergency Action Plan.
- Responsible for reporting nonconformities.

Contractors and Subcontractors

- Responsible for assigning E&S Staff and HS Staff for the implementation of this plan.
- Responsible for complying with all requirements set out in this plan in accordance with the terms of the contract.
- Responsible for allocating resources from its own body for the effective execution of this plan.
- Responsible for reporting any nonconformity with the plan to the EHS Team.



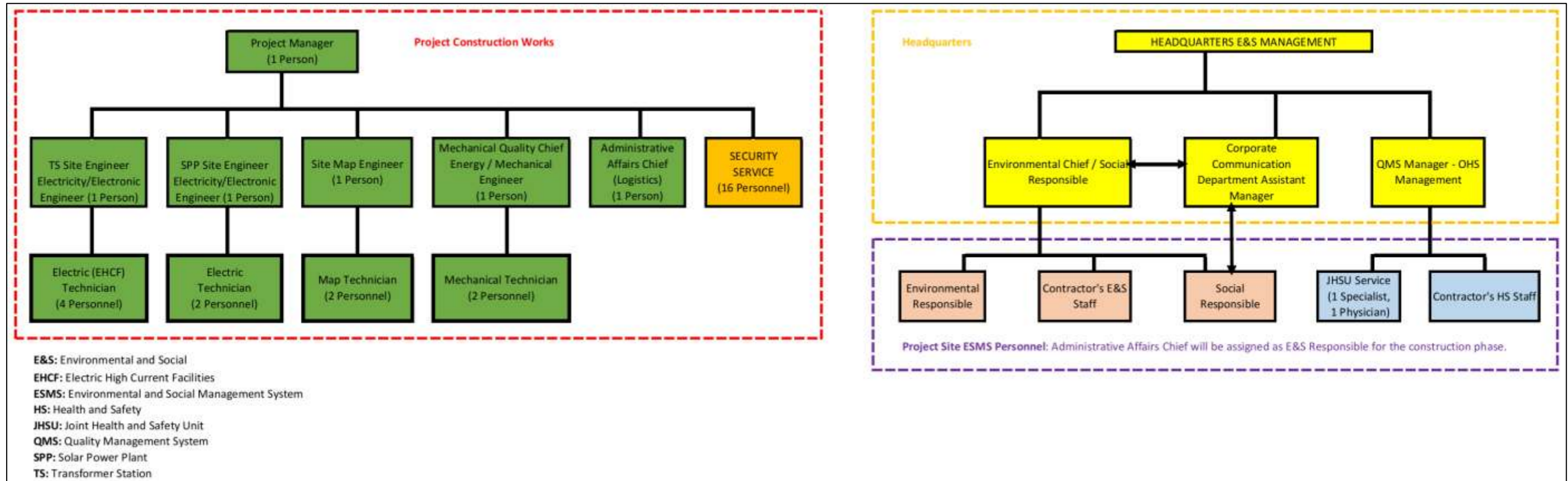


Figure 2. Organizational Chart at the Project-level for the construction phase

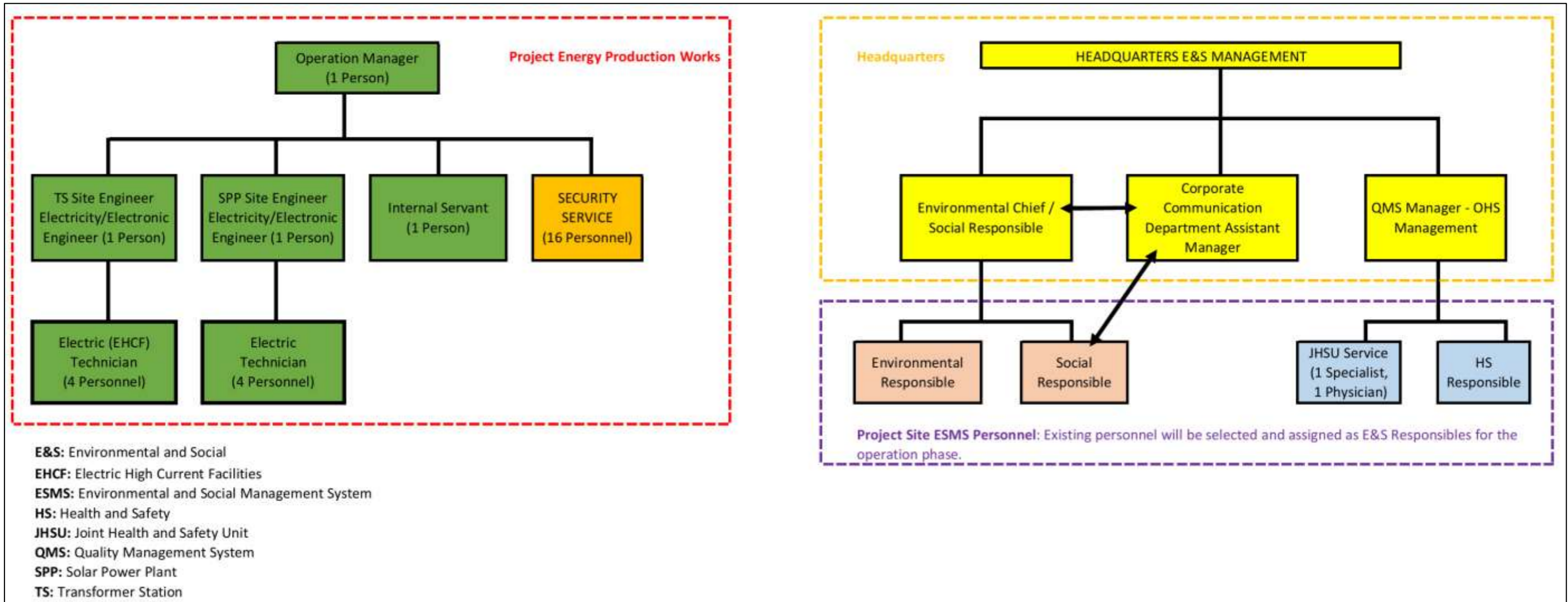


Figure 3. Organizational Chart at the Project-level for the operation phase

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4 ENVIRONMENTAL AND SOCIAL IMPACTS

4.1 Land Use, Soil, Geology and Natural Hazards

During the land preparation activities such as clearance and excavation, the soil of the project area will be disturbed, however, the impacts will be localized and restricted to the construction site.

The impacts of the land preparation works are the loss of topsoil, mixing of the distinct layers of the soil if not properly stored, and the potential soil erosion. Soil erosion may be caused by exposure of soil surfaces to rain and wind during site clearing, earth moving, and excavation activities; however, the probability for occurrence is low since the slope of the land is 0-10%. Recommended soil erosion management approaches are contouring and minimizing length and steepness of slopes, mulching to stabilize exposed areas, if required, re-vegetating areas promptly and designing drainage systems, such as channels and ditches, for post-construction flows.

Moreover, the risk of soil contamination is of concern due to oil and fuel flow/leakage and uncontrolled storage or disposal of solid and/or liquid wastes to be generated during the construction phase.

The expected impacts of the operation phase on the land use and soil may be resulted from the repair and maintenance works since the the activities will have a rather limited physical interaction with the environment.

4.2 Water Resources, Water Quality and Wastewater

Wastewater management of the project will be carried out in line with the following principles:

- Primarily, all kind of wastewater generation is the responsibility of the producer. Unnecessary water use will be avoided and wastewater generation will be prevented as much as possible.
- In order to prevent wastewater generation, necessary trainings will be given to the personnel and information will be given.
- In cases where wastewater generation cannot be prevented, as little wastewater as possible will be generated in line with the minimization principle.
- The responsibility of the project owner and wastewater producers (employees) is at the forefront within the scope of efforts to prevent wastewater generation and minimize its impact on the environment. In this context, the least preferred method in wastewater management is the discharge of wastewater.

The drinking water needs of the personnel will be purchased from the market as carboy size bottled water. As for the domestic water, an amount of 18 m³/day for the construction phase was requested to be supplied from the General Directorate of Hatay Water and Sewerage Administration via an official letter and the request was affirmed by the authority on 23.12.2022 via the Official Letter numbered 72551 if the fee to be paid by the Client (see Appendix-1). The provisions of the Regulation on Water Intended for Human Consumption, which entered into force after being published in the Official Gazette dated 17.02.2005 and numbered 25730, will be complied with regarding the water to be supplied at every stage of the project.

The water supply requirement for the land preparation and construction phase will be for the personnel needs and dust prevention.



During the construction phase, the site will be wetted at regular intervals to minimize dust emissions that may result from the activities, such as vehicle movements etc., on the site. The water is planned to be supplied via water trucks.

There will be water use for the personnel needs and solar panel washing during the operation phase.

With the commissioning of the planned project, water will be required for cleaning of the PV modules against the dust particles from traffic, building activity or dust storms and possible module soiling from bird excreta. Clean, low mineral content water is preferred for cleaning the modules and no chemicals will be used. The water will be provided from the market via water trucks.

Project water and wastewater flow diagram is presented in Figure 4.

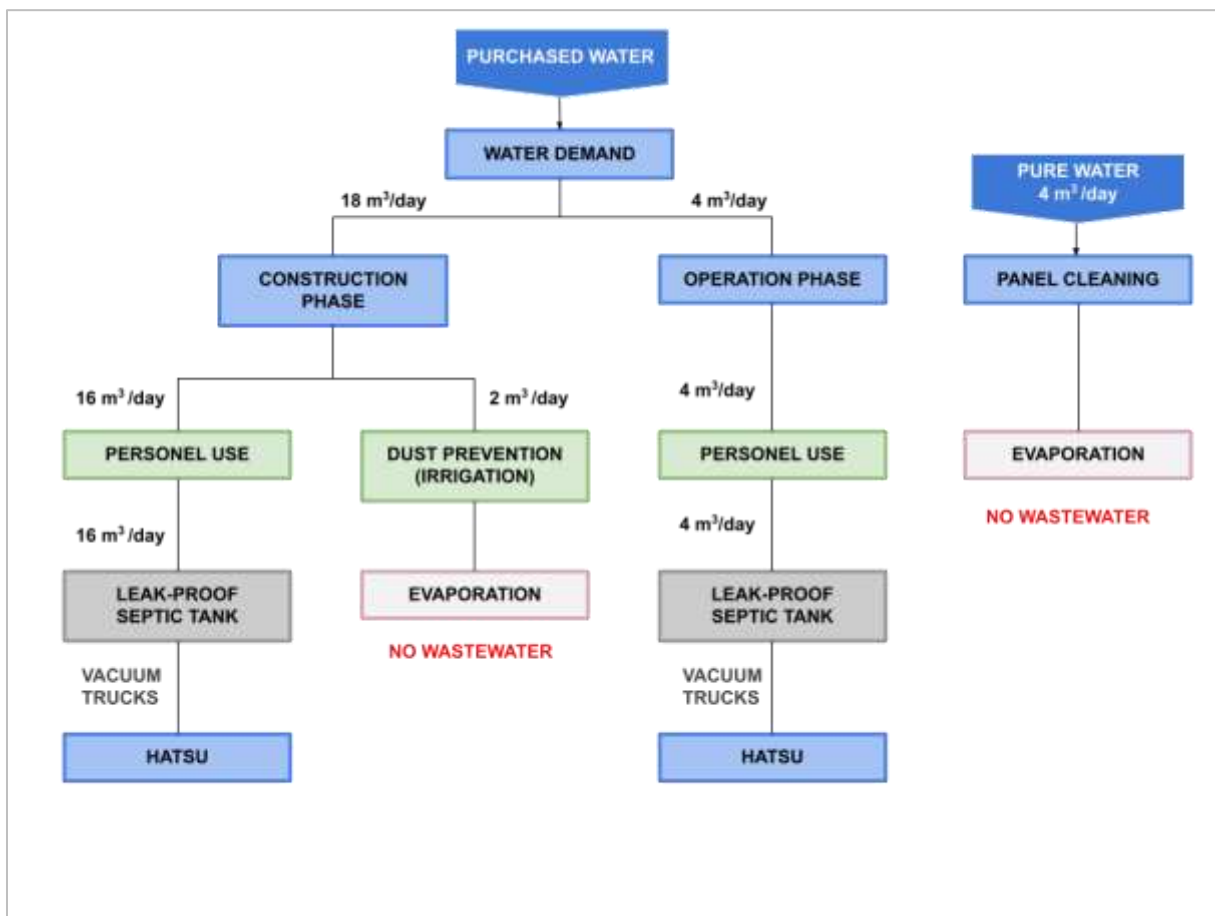


Figure 4. Project Water and Wastewater Flow Diagram

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4.3 Air Quality and GHG Emission

The air emission sources in the scope of the project are:

- Land preparation and mounting activities during land preparation and construction phase,
- Fuel related emission due to work machinery activities.

Emissions that will occur during the land preparation and construction phase of the project are the dust emissions from vegetative soil stripping, excavation for ground leveling and mounting activities and exhaust gas emissions from the operation of construction machinery.

During the operation phase of the project, there is no air emission due to the operation of solar panels and other units.

According to risk assessment performed for the climate change and GHG emission reduction within the scope of the Project, the physical risks for the SPP has been identified as chronic heat stresses or acute hot days, chorically changing precipitation or extreme rain events, strong winds or storms, and sea level rise or floods. The transitional risks have also been determined as market and technology shifts, policy and legal, and reputational risks. The details are given in Climate Change Risk Management and GHG Emission Reduction Plan (CNR-PLN-ERZ-CCRMP-002), and the mitigation measures have been summarized in Section 4.13 Environmental and Social Management Plan.

4.4 Noise

In the land preparation and construction phase of the project, noise generation will occur due to land preparation activities and solar panel installation. During the operation phase of the project, there is no noise generation due to the operation of solar panels and other units.

In the land preparation and construction phase Noise Level Modeling study of the project, calculations were made according to working equipment noise level and noise maps were created by considering the nearest settlement areas, active roads in the Aol identified for the physical environment, and the Organized Industrial Zone located in the north of the Project area (Osmaniye OIZ). When cumulative impact assessment is made, baseline measurements and construction phase noise level were evaluated together; there are no exceeding limit values in national regulation and international standards.

Solar Panel Projects are exempt from noise within the scope of Environmental Permit. However, in case of complaints from the settlements near the project area, noise measurement will be made in accordance with the national legislation in the places determined by considering the sensitivity of the receiving environment.

4.5 Waste and Resource Management

Activities of the facilities result in generation of a wide range of wastes that require an adequate planning to be in compliance with Project Standards. Accordingly, in order to manage wastes effectively, internationally well accepted "Waste Management Hierarchy" shall be used with a focus on waste prevention, and then a decreasing focus on waste reuse, recycling, recovery, and disposal as it can be seen in Figure 5 below.



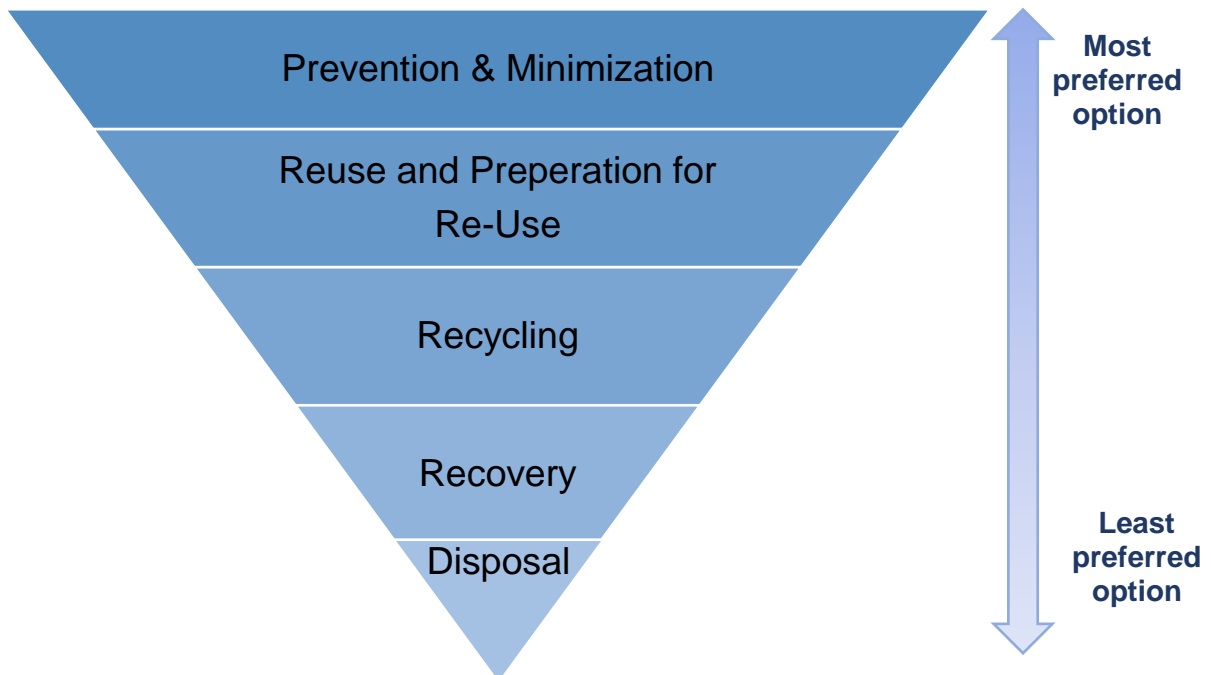


Figure 5. Waste Management Hierarchy

Definitions of the hierarchical steps presented above are given below:

- As the option with the highest priority, generation of wastes shall be prevented / minimized as much as possible by implementation of practical and/or embedded measures, for instance design measures of manufacturing processes,
- As the option with secondary priority, generated wastes shall be re-used or prepared for re-use without any treatment,
- The wastes which could not be re-used, shall be recycled,
- Recovery options, such as energy recovery, shall be evaluated as the quaternary priority, and
- As the option with lowest priority, after evaluation and implementation of all above steps, remaining wastes shall be sent to final disposal, such as landfilling, incineration without energy recovery etc.

All type of wastes and their characteristics that occur during both of two phases of the project are given in Table 3.

Table 3. Waste Types and Properties

Project Phase	Waste Code	Explanation	Source	Disposal	Characteristic	Quantity (kg/year)	
Land Preparation- Construction	20 03 01	Mixed municipal waste	Personnel activities	Relevant Municipal Administration Solid Waste Collection System	Non- hazardous	37,668	
Operation						9,417	
Land Preparation- Construction	15 01 01	Paper-cardboard	Personnel, warehouse, dispatch, packaging, etc.	Licensed recycling/disposal company		Non- hazardous	7,533.6
	15 01 02	Plastic					
Operation	15 01 07	Glass					1,883.4
Land Preparation- Construction and Operation Phase	18 01 03	Wastes whose collection and disposal are subject to special treatment to prevent infection	Infirmery	Licensed Medical Waste Disposal/Sterilization Plant		Hazardous	13,8
	16 01 03	End-of-Life Tires	Vehicle maintenance	Licensed recycling/disposal company	Non- hazardous	40	
	08 03 17	Waste printing toners containing hazardous substances	Use of printers and printing devices	Licensed recycling/disposal company	Hazardous	35	
	20 01 21	Fluorescent lamps and other mercury-containing waste	Production and administrative buildings with lighting	Licensed recycling/disposal company	Hazardous	50	
	16 02 15	Dangerous parts removed from discarded equipment	Whole facility area	Licensed recycling/disposal company	Hazardous	50	
	16 01 21	Hazardous parts other than 16 01 07 to 16 01 11, 16 01 13 and 16 01 14					
	20 01 35	Discarded electrical and electronic devices containing hazardous parts other than 20 01 21 and 20 01 23					

Project Phase	Waste Code	Explanation	Source	Disposal	Characteristic	Quantity (kg/year)
	15 01 10	Packaging materials containing residues of hazardous substances or contaminated with hazardous substances	Maintenance and repair works	Licensed recycling/disposal company	Hazardous	100
	15 01 11	Metallic packaging materials containing hazardous porous solid structure (e.g. asbestos), including empty pressure vessels				
	15 02 02	Absorbents contaminated with hazardous substances, filter materials (oil filters if not otherwise specified), cleaning clothes, protective clothing	Personnel use Maintenance and repair works	Licensed recycling/disposal company	Hazardous	100
	20 01 26	Oils and fats other than 20 01 25	Refectory	Licensed recycling/disposal company	Hazardous	240
Construction Phase	17 05 04	Excavation Materials	Excavation Works	Transported to the authorized dumping areas of the administration.	Non-hazardous	14,305.39 tons
Operation and Decommissioning Phase	17 01 07	Waste Solar Panels	End-of-life solar panels	Licensed recycling/disposal company	Non-hazardous	175(piece)

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4.6 Landscape and Visuality

In the land preparation and construction phase of the project, poor management of land preparation and construction activities will be potential impact on landscape. During the operation phase of the project, solar reflections and flare will be potential impact on visuality. These impacts will be mitigated by taking the necessary precautions.

4.7 Cultural Heritage

The project area is the ancient city of Issos (Epiphaneia), which was declared a first degree the presence of any cultural heritage at the project area and its Aol was questioned via official correspondence with Hatay Regional Council on the Preservation of Cultural Heritage. It is informed in the official letter of the state authority that the project area is located just to the west of Issos (Epiphaneia) Ancient City, which was declared as 1st degree archaeological site in 2005. In addition, another site (Buruntas Tumulus) that is located at the northeast part within the borders of the project area was declared as 1st and 3rd degree archaeological area in 2022. During the site investigations carried out by the said state authority, no moveable or immovable cultural asset was observed on site.

Regarding the official letter of Hatay Regional Council on the Preservation of Cultural Heritage, as stipulated by the said authority, the borders of the project area should be revised considering the coordinates of the 1st and 3rd degree archaeological sites provided in the official letter. In that regard, the general layout of the project area is revised excluding the Buruntas Tumulus and its access road, i.e. the placement of the solar panels was rearranged considering the Tumulus, and no physical intervention to the Tumulus will be of concern since the tumulus area will be wire fenced together with the access road to be built to the tumulus.

Furthermore, Issos Ancient Waterway is traversed by the route of Alternative Access Road-1 planned to be built and offered under the Zoning Plan. For this reason, the project owner has determined alternative access roads to connect to the the project area. In accordance with the opinions and suggestions during the construction phase of the project, the project will be continued with the most suitable alternative route for the Issos Ancient Waterway. It is planned to build a bridge over the ancient waterway within the scope of the Project to avoid any damage to the cultural asset.

Moreover, the land preparation and construction works will be carried out with particular attention considering this cultural heritage site.

In addition, a Chance Find Procedure has been prepared and will be applied throughout the lifetime of the project.

In this context, work and operations will be carried out by taking measures within the scope of national legislation in and around the Buruntaş Tumulus, which is within the project area, and no physical intervention will be made in the said area. For this reason, the General Layout Plan of the project was established by considering the Buruntaş Tumulus.

In the scope of the cultural and natural heritage, all project activities are realized according to national regulation and international standards. Detailed evaluations about cultural and natural heritage situation of the project and precautions are given in Cultural Heritage Management Plan (See CNR-PLN-ERZ-CHMP-001).



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4.8 Biological Environment

In line with the provisions of ESS6 and PS6, biodiversity impact assessment has been conducted following the mitigation hierarchy. The main objective of biodiversity studies undertaken within the scope of the Project is to develop and implement mitigation measures and actions in order to achieve no net loss in natural habitats and species of high conservation concern, and net gains in critical habitat.

Following the implementation of the mitigation hierarchy, and after appropriate avoidance, minimization and restoration measures are taken, biodiversity offsets may be considered to compensate for significant residual impacts targeting measurable conservation outcomes as net gains in critical habitats within the scope of the Project's ESMP.

In the scope of the biodiversity, all project activities will be realized according to national regulation and international standards. Project Specific Biodiversity Action Plan (BAP) and Biological Monitoring Plan (BMP) have been developed and will be implemented throughout the Project lifetime with the main objective of achieving "no-net-loss" of biodiversity in accordance with IFC PS6.

4.9 Socio-Economic Environment

In the construction and operation phase of the Project, there will be local recruitment and local procurement risk. The actions and measures to be taken for the labor and employment will be in compliance with Turkish Labor Law and international standards. Prioritization will be given to the local recruitment.

4.10 Labour and Working Conditions

In the construction and operation phase of the Project, there will be potential impacts that affect the Project.

- working conditions and management of worker relationship,
- protecting the workforce,
- workers engaged by third parties and the supply chain,

All project personnel including contractors, sub-contractors and service providers will comply with the requirements specified in the ESIA and other sub-management plans (Labor Management Plan, Emergency Preparedness and Response Plan, Occupational Health and Safety Management Plan, Stakeholder Engagement Plan, etc.) prepared for the project. Other details regarding the contractors and suppliers, and relevant labour and working conditions mitigation measures are given in Labor Management Plan.

If there is a need for a group termination, a Retrenchment Plan will be created and executed to alleviate the negative impacts on employees. This collective dismissal strategy will adhere to the non-discrimination principle, mirror the client's discussions with workers, labor organizations, and potentially the government. It will also align with the terms outlined in collective bargaining agreements. The retrenchment process will align with both national laws and international standards for best practices.



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4.11 Community Health and Safety Management

The Project may have impacts on community health and safety such as increased traffic, occupational safety risks and dust due to the use of machinery and equipment during the construction phase. Accordingly, it will be ensured by the Client that necessary arrangements are made to eliminate the security risks of workers on site and the local residents in the closest settlements, and that the provisions of the relevant regulation are complied with. Workers and local residents may be affected by the safety problems resulting from traffic and other activities, especially during the construction phase.

4.12 Impact/Risk Categorization Approach

The methodology to be used for characterization of environmental and social impacts/risks arising from the implementation of the Project has been developed based on the methodologies described in the UK's applicable government publications on Environmental Impact Assessment¹ and other available guidance documents on impact assessment².

In accordance with good ESIA practice, significance of impacts will be determined based on the sensitivity of the receptor and the overall magnitude of the Project's impact on that specific receptor. The magnitude of the impact is determined using quantitative or, where this is not possible, qualitative methods based mainly on professional judgement. An environmental and/or social impact may be beneficial or adverse. The sensitivity of the receptor will be determined on the basis of the baseline information, which takes into consideration the public interest, designations, legal requirements, acceptability, sustainability, etc., and also where relevant, in consultation with the affected communities. The overall magnitude of the impacts will be determined as a factor of the following magnitude components. An impact or the magnitude of an impact is determined by a comprehensive analysis of criteria, which may encompass the following:

- Geographical extent (wide, local, or restricted)
- Magnitude (high, medium or low, e.g. how much area, how many trees, level of emission or noise, etc.)
- Reversibility (long term reversible/irreversible, medium-term reversible or short-term reversible)
- Duration (long term, medium term, or short term)
- Frequency (continuous, recurrent, intermittent, or one-off)

Criteria for magnitude factors are provided in Table 4.

Following Table 4 summarizes these details regarding the consultation and disclosure process.

¹ Institute of Environmental Management and Assessment-IEMA, 2011: The State of Environmental Impact Assessment Practice in the UK, Scottish Natural Heritage's (SNH) Handbook on Environmental Impact Assessment (2013)

² Canter, 1993, Standards Association of Australia, 1999, etc.

Table 4. Magnitude factors and scales

Factor	Scales		
Magnitude	High	Medium	Low
Geographical extent	Wide	Local	Restricted
	Beyond 1,000 m corridor	Within 1,000 m corridor	Within the construction site
Reversibility	Irreversible/Long-term reversible	Medium-term reversible	Short-term reversible
	Irreversible after 30 years of operation period or irreversible	Irreversible after 30 years of operation period or reversible	Irreversible after 2 years of construction period or reversible
Duration	Long-term	Medium-term	Short-term
	After 30 years of operation	Within 30 years of operation	Within 2 years of construction
Frequency	Continuous/Recurrent	Intermittent	One-off/rare

General criteria to be taken into consideration when determining sensitivity of the receptor and the overall magnitude are provided in Table 5, whereas specific assessments and methodological variations (if any) for each environmental and/or social component are presented in relevant chapters of the ESIA Report.

Table 5. General Criteria for Identification of Receptor Sensitivity and Impact Magnitude Levels

Level	Receptor Sensitivity	Impact magnitude	
		Adverse	Beneficial
High	Highly important (national and international scale of importance), high rarity, potential for substitution very limited	Loss of resource and/or quality and integrity of resources; severe damage to key characteristics, features or elements.	Large scale or major improvement of resource quality; extensive restoration or enhancement; major improvement of attribute quality.
Medium	Moderately important (regional scale of importance) and moderate rarity, potential for substitution limited	Loss of resource, but not adversely affecting the integrity; partial loss of/damage to key characteristics, features and elements	Benefit to, or addition of, key characteristics, features or elements; improvement of attribute quality.

Level	Receptor Sensitivity	Impact magnitude	
		Adverse	Beneficial
Low	Minor importance (local scale of importance), not rare	Some measurable change in attributes, quality or vulnerability; minor loss of, or alteration to, one (maybe more) key characteristics, features or elements	Minor benefit to, or addition of, one (maybe more) key characteristics, features or elements; some beneficial impact on attribute or a reduced risk of negative impact occurring.
Negligible		No or very low importance and rarity	No or very minor loss or detrimental alteration to one or more characteristics, features or elements

Following the identification of receptor sensitivity and overall magnitude of an impact on that specific receptor, the significance of the impact will be determined by using a standard matrix style approach, which consists of a 4x4 matrix. The matrix and general descriptions of each significance level identified in the matrix are provided in Table 6.

Table 6. Significance Assessment Matrix

		Receptor Sensitivity			
		High	• Medium	Low	Negligible
Overall Magnitude	High		•		
	Medium		•		
	Low		•		
	Negligible		•		
Major	Impacts are considered to be very important and are likely to be material in decision-making, which would be associated with sites or features of international, national or regional importance as well as local importance if the site or feature is subject to a major change. Mitigation measures are imperative to reduce the significance to lower levels before proceeding with the Project.				
Moderate	<ul style="list-style-type: none"> Impacts are not likely to be key decision-making factors. The cumulative impacts of such factors may influence decision-making, if they lead to an increase in the overall adverse impact on a particular receptor. If possible, impact significance are to be reduced to lower levels by taking mitigation measures; otherwise acceptance of associated risks is required for proceeding with the Project. 				
Minor	<ul style="list-style-type: none"> Impacts may be raised as local factors, which are unlikely to be critical in the decision 				

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		Receptor Sensitivity
		making process, but important in enhancing the subsequent design of the Project. Assurance of compliance with standards and safety criteria is sufficient to proceed.
Negligible		<ul style="list-style-type: none"> • No impact or impacts are beneath the level of perception so that they are acceptable with normal operating procedures.

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4.13 Environmental and Social Management Plan

The impact mitigation measures are developed for all phases of the Project in consideration of the national legislation and the international standards and are given in Table 7 and Table 8 for the land preparation and construction phase and operation phase.

The responsibility for the application of the mitigation management plans will rest upon the Contractor and the Client for the construction phase and upon the Client for the operation phase.

Moreover, it should be noted that the following activities, measures and actions for the land preparation and mobilization of the Project have already been taken by IC İçtaş Solar Energy. Other mitigation measures and monitoring activities will be carried out during the construction phase and operation phase of the Project.

- The Licence Area has been marked by mapping engineers and technicians in the project area.
- Environmental and social training was given to all personnel.
- Top-soil stripping has been started, and topsoil and excavated soil is used for ground leveling by regarding the natural slope and drainage conditions.
- Erosion control measures have been considered in the project design details.
- Maintenance of the vehicles, machinery and equipment is performed on a regular basis.
- The waste area was prepared temporarily. Waste storage was purchased, will be transferred to the project area.
- A spill kit and secondary containers were bought.
- Spill and leak response training was given to all personnels.
- Septic tank was built and is controlled periodically.
- Grievance mechanism was created. Stakeholder meetings were held.
- Stakeholder (Yoruks, gendarma, mukhtar, municipality) meetings were held by the Consultant.
- An application for a groundwater use permit was made.
- The access roads used are irrigated when the weather is sunny and/or hot.
- Traffic signs were localized.
- Structural fortification to enhance resilience against wind forces, preparation and implementation of diligent emergency have been considered in the Project details.
- All national legislation provisions have been complied with.
- The air quality and noise generation mitigation measures are carried out appropriately.
- Absorbents, firefighting equipment, etc. are kept ready on site for immediate response, in case of an emergency such as spills and fires.
- Waste recycling/recovery/disposal agreements with the authorized municipality or licensed firm are executed for the management of hazardous and non-hazardous wastes.
- The waste management hierarchy (the prevention, reduction, reuse, recycling and finally disposal) are followed during the operational activities.
- Animals discovered during vegetation clearance or felling have been removed and relocated to a safe refuge before the land preparation and ground leveling.
- Bulbs of *Cyclamen persicum* have been collected (March-April) and relocated to suitable habitats before the land preparation and ground leveling.
- Common Tortoises have been relocated when they were seen in the project area.
- Visual observations are made on site before the land preparation activities to prevent damage to species or to minimize possible losses.



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- Traffic signs have been placed on the access road.
- A grievance box for the employees has been placed and checked periodically.
- Occupational health and safety issues have been carried out with OHS Specialist.
- Fire extinguishers have been placed.
- An infirmary and an ambulance were placed in the project area.
- Security personnel were employed.
- A site-specific EPR Plan has been prepared and implemented by all workers.
- All workers were checked by gendarmerie with an identity control system. Forced labor, child labor and unregistered employment measures have been implemented according to the labor law of Türkiye.
- Orientation training was provided.
- Environmental and OHS specification was added to all main contractors/suppliers' agreements.
- Four personnel were trained on safe driving.
- Grievance mechanism was created. Stakeholders were informed about contact information.
- Meetings with Yoruks were held by Consultant and Yoruks have been employed as security personnel.

Table 7. Mitigation Management Plan for Land Preparation and Construction Phase

LAND PREPARATION AND CONSTRUCTION PHASE								
Topic	Potential Impact / Risk	Type of Impact	Impact Significance (prior to mitigation)	Proposed Mitigation Measures	Residual Impact Significance	Cost Scale and Relevant Resources	Responsibility	
PHYSICAL ENVIRONMENT								
Land Use, Soil, Geology and Natural Hazards	Loss of Vegetative Topsoil	Adverse	Moderate	<ul style="list-style-type: none"> Land preparation and construction works will be conducted at designated site that will be visibly and appropriately marked. Waste and Wastewater Management Plans will be implemented, and training will be provided to the construction personnel on the Plan. Topsoil will be stripped only from the project areas. Stripping activities will not be performed when soil is wet to avoid soil compaction. Topsoil will be stored separately from subsoil for the shortest time possible and it will be used for landscaping purposes. If long-duration storage is planned, the average height of topsoil stacks will be 2 meters and the side slope of these stacks will not exceed 3:1. Dykes will be established around the designated storage area of the excavated material to hinder loss of soil. The provisions of the Regulation on Control of Excavation Soil, Construction and Demolition Wastes shall be complied during land preparation and construction phase of the Project and excess excavation material will be re-used as appropriate or disposed of in existing licensed excavation waste storage sites. Grading will be conducted by regarding natural slope and drainage conditions. To avoid any flooding events, a drainage system will be constructed in line with natural drainage system. Erosion control measures should be implemented after the completion of the earthworks. Reinstatement/revegetation should be carried out at all disrupted area after the termination of the construction works to protect soil against winds by preferring appropriate herbs/grasses to be sowed. Maintenance of the vehicles, machinery and equipment will be performed on a regular basis. Discharge of hazardous materials and wastes into soil will be forbidden. Hazardous materials and hazardous wastes should be temporarily stored in a designated area with impermeable floor in an enclosed manner. Secondary containment structures and spill kits should be utilized along with the implementation of the Emergency Preparedness and Response Plan. Accidental spills and leakages will be managed through implementation of the Emergency Preparedness and Response Plan. Integrity of the septic tank will be control periodically. Provisions of the Regulation on the Control of Soil Pollution and Soil Contaminated by Point Sources will be complied. Wastes and wastewater to be generated during the land preparation and construction phases of the Project will be stored and disposed of in a controlled manner in accordance with the relevant regulations defined in Section 3.2.1 and in line with the management practices described in this report. A grievance mechanism will be established to ensure any complaints/comments regarding the Project will be received and responded in a timely manner, providing solutions, and taking corrective measures as appropriate. Necessary information will be shared with community members who are using pastureland during land preparation before construction. Training of all project personnel will be provided to create awareness in terms of environmental, social and OHS aspects. The provisions of the "Regulation on Structures to be Built in Disaster Zones" of the Abrogated Ministry of Public Works and Settlement and the provisions of the "Building Earthquake Regulation of Türkiye" of the Disaster and Emergency Management Presidency will be strictly complied with. All engineering structure and superstructures (fill, cut) in the project will be designed and constructed considering the earthquake resistant design parameters and criteria. 	Minor	Included in construction costs	Contractor Client	
	Mixing of Distinct Soil Layers	Adverse	Moderate		Minor	Included in construction costs	Contractor Client	
	Improper Handling of Excavation Waste	Adverse	Moderate		Minor	Included in construction costs	Contractor Client	
	Erosion Potential	Adverse	Minor		Negligible	Included in construction costs	Contractor Client	
	Soil Contamination	Adverse	Minor		Negligible	Included in construction costs	Contractor Client	
	Damage owing to Natural Hazards	Adverse	Major		Moderate	Included in construction costs	Contractor Client	
Water Resources, Water Quality and Wastewater	Change in Surface Water Quality	Adverse	Minor	<ul style="list-style-type: none"> Groundwater usage for the land preparation and construction activities will be avoided. If groundwater usage is in question, unauthorized use of groundwater should not be made within the scope of the project. Environmental and Social Management Plan along with Waste and Wastewater Management Plan will be implemented for the lifecycle of the project. Necessary trainings about the management plan for the all-project personnel including sub-contractor(s) will be provided to create awareness on waste management practices such as zero waste. In case of any fluid storage, secondary containment structures (such as drip trays) and spill kits will be utilized to prevent spill/leakage. Domestic wastewater generated during the construction phase will be collected in leak-proof septic tanks and periodically vacuumed before reaching occupancy rate of 80-90% via vacuum trucks and collected by the General Directorate of Hatay Water and Sewerage Administration following the Water Pollution Control Regulation and the HATSU Tariffs Regulation. Integrity of the septic tank should be checked regularly. Maintenance of the vehicles and equipment will be performed on a regular basis at the authorized services. In case of intervention in the construction site, all maintenance activities along with refuelling should be conducted on appropriate impermeable ground by keeping spill kit ready. 	Negligible	Included in construction costs	Contractor Client	
	Change in Groundwater Quality	Adverse	Minor		Negligible	Included in construction costs	Contractor Client	
	Improper Wastewater Management	Adverse	Moderate		Negligible	Included in construction costs	Contractor Client	

LAND PREPARATION AND CONSTRUCTION PHASE							
Topic	Potential Impact / Risk	Type of Impact	Impact Significance (prior to mitigation)	Proposed Mitigation Measures	Residual Impact Significance	Cost Scale and Relevant Resources	Responsibility
Air Quality and GHG Emissions	Deterioration in Air Quality	Adverse	Moderate	<ul style="list-style-type: none"> The impact of the dust formed during the construction phase will be mitigated by watering the construction site and the access roads. Truck carrying dust-generating materials will be covered and the upper part of the material will be kept at 10% humidity. Loading/unloading will be carried out carefully without scattering. Maintenance of the vehicles will be performed on a regular basis. The requirements of the "Exhaust Gas Emission Control and Gasoline and Diesel Quality Regulation" will be met. Idling of vehicles will be avoided to prevent unnecessary emissions. Speed limit will be set and adhered. Driving of construction vehicles through the settlements should be avoided where possible. Materials will be loaded and unloaded without scattering and throwing. As minimum number of machinery and equipment as possible will be operated simultaneously. The top of the excavated material will be wetted to prevent dust formation and additional dust control measures, such as usage covers, wind barriers, silt fence, will be implemented, if required. Compliance with the air quality limit values stipulated in national legislation and WBG/IFC General EHS Guidelines will be ensured. In case of any grievance, dust measurements will be conducted, and urgent corrective and preventive action(s) will be taken. Heat stress mitigation, climate-controlled equipment, equipment maintenance and monitoring, implementation of emergency plans Resilience of SPP infrastructure and viable supply chain strategies for efficient water management Structural fortification to enhance resilience against wind forces, preparation and implementation of diligent emergency Implementation of flood preparedness and response, investment of flood-resistant infrastructure, and maintenance of appropriate insurance coverage strategy. 	Negligible	Included in construction costs	Contractor Client
	Increase in Dust Concentrations	Adverse	Moderate		Negligible	Included in construction costs	Contractor Client
	Disturbance in Community and Occupational Health and Safety	Adverse	Moderate		Negligible	Included in construction costs	Contractor Client
	Climate Change / GHG Emission Reduction (heat stress / hot days, changing precipitation / extreme rain events, wind / storms, sea level rise / floods)	Adverse	Moderate		Negligible	Included in construction costs	Contractor Client
Noise Levels	Increase in Noise Levels	Adverse	Minor	<ul style="list-style-type: none"> As minimum number of machinery and equipment as possible will be operated simultaneously. Maintenance of the vehicles will be performed on a regular basis to ensure their good working conditions. Idling of vehicles will be avoided. Driving of construction vehicles through the settlements will be avoided where possible. Night works should be kept to a minimum. When necessary, portable noise barriers are recommended to minimize noise emission to the nearest settlement. All construction activities will be carried out in compliance with the noise levels specified in the Environmental Noise Control Regulation and noise limits of IFC. Induction training with necessary environmental training that aims at reducing noise caused by project activities will be provided to all project personnel to create awareness. Notification of communities/settlements about the noise levels that may be created during construction phase due to heavy machinery use will be provided. Grievance Mechanism of the project will be in place. In case of any grievance, urgent corrective and preventive action(s) will be taken and necessary noise level measurements will be performed. Employees will be provided with protective equipment as specified in the Occupational Health and Safety Law. 	Negligible	Included in construction costs	Contractor Client
Waste and Resource Management	Inadequate Management of Waste	Adverse	Moderate	<ul style="list-style-type: none"> A project-specific Waste Management Plan will be implemented. Training covering waste generation according to the waste management hierarchy (the prevention, reduction, reuse, recycling and finally disposal) will be provided for personnel to raise awareness. Waste management activities will be conducted in compliance with the applicable waste management regulations. Zero waste certificate will be obtained. Regular on-site inspections of solid waste management will be performed. The wastes will be segregated (i.e., hazardous/non-hazardous, recyclable/non-recyclable) and stored temporarily in designated storage areas. The temporary waste storage areas will be constructed based on the requirements listed in the Waste Management Regulation. Hazardous and non-hazardous wastes will be stored separately, having different entrance doors. Wastes will be stored separately according to the classification, labels indicating the type of waste will be placed for each type of waste. There will be enough space for the licensed waste transport vehicles to receive the waste. Reinforced concrete or similar impermeable materials will be used on the floors of storage areas to ensure soil, surface water and groundwater resources are protected from potential contamination. The top and four sides of the storage area will be covered to prevent the entrance of precipitation into the area. Adequate ventilation will be provided in case storage of volatile wastes is required. Adequate drainage system will be provided to collect any leakages. 	Minor	Included in construction costs	Contractor Client

LAND PREPARATION AND CONSTRUCTION PHASE								
Topic	Potential Impact / Risk	Type of Impact	Impact Significance (prior to mitigation)	Proposed Mitigation Measures	Residual Impact Significance	Cost Scale and Relevant Resources	Responsibility	
				<ul style="list-style-type: none"> Absorbents, firefighting equipment, etc. will be kept ready on site for immediate response, in case of an emergency such as spills and fires. Physical access restrictions will be applied at waste storage areas through use of gates, fences, and locks; only authorized persons will be allowed in storage areas. Cautionary signage and boards with name and contact number of authorized personnel will be provided at the storage areas. There will not be any waste burning, disposing, or burying activities under any circumstances. The transportation of wastes will be ensured in appropriate frequencies so that the storage capacities are not exceeded. Waste recycling/recovery/disposal agreements with the authorized municipality or licensed firm will be executed for the management of hazardous and non-hazardous wastes. Official waste declarations for all waste generated will be submitted to the online system of MoEUCC. Grievance Mechanism of the project will be in place. In case of any grievance, urgent corrective and preventive action(s) will be taken. 				
	Additional load on existing waste management facilities	Adverse	Minor	<ul style="list-style-type: none"> The waste management hierarchy (the prevention, reduction, reuse, recycling and finally disposal) will be followed during the operational activities. Waste recycling/recovery/disposal agreements with the authorized municipality or licensed firm will be executed for the management of hazardous and non-hazardous wastes. 	Negligible	Included in construction costs	Contractor Client	
Landscape and Visuality	Poor Management of Land Preparation and Construction Activities	Adverse	Minor	<ul style="list-style-type: none"> It will be ensured that the excavated material generated will be used for backfilling, land levelling and landscaping in the first stage, and the vegetable soil material will be used for landscaping. The residual material will not be stored in the project site. It will be transported to the landfills approved by the administration. In order to minimize habitat loss during the works to be carried out within the scope of the project, tree cutting/shaving, unnecessary land use and destruction will be prevented as much as possible. The boundaries of the project area will be determined with sensitive GPS measuring devices, and identifying marks will be placed on these points (concrete polygon stones, etc.). Warning signs drawing attention to wild animals will be placed on the roads to be used while providing transportation to the project area during field studies and a speed limit of 30 km/h will be applied. Reptile species to be observed on the road, especially Tortoises, will be taken from the road and transported to a suitable habitat. Fast-moving creatures such as snakes and lizards will be allowed to escape from the road. The protection measures of the Bern Convention and the provisions of Articles 6 and 7 of this contract will be strictly followed. 	Negligible	Included in construction costs	Contractor Client	
Cultural Heritage	Destruction or deliberate damage to cultural heritage	Adverse	Moderate	<ul style="list-style-type: none"> Following the application to Hatay Regional Council on the Preservation of Cultural Heritage, the measures to be provided in their response letter will be confirmed strictly. The Chance Find Procedure, based on national laws, international standards and best practices, will be applied. In case of a chance find, all activities will be ceased, Hatay Regional Council will be contacted, and the site will be secured the Contractor. The experts of Hatay Regional Council will properly secure chance find site via flagging, no-entry signs, etc., prevent/limit the vehicle traffic within the immediate vicinity of chance find, and protect the site by not moving, removing or further disturbing the chance find. Coordinates of the chance find will be recorded and photographed. The site and its vicinity will be secured against damage or loss until a final decision is made about this site by the Council. 	Minor	Included in construction costs	Contractor Client	
BIOLOGICAL ENVIRONMENT								
Biological Environment	Habitat loss / degradation, disturbance on flora and fauna	Adverse	Moderate	<ul style="list-style-type: none"> Project Specific BAP and BMP will be implemented throughout the Project lifetime with the main objective of achieving "no-net-loss" of biodiversity. The Project personnel will be trained on BAP and BMP and on the sensitivity of natural habitats and species, conservation priorities, and nesting areas that will be identified through pre-construction surveys. To minimise habitat loss during the works to be carried out under the project's scope, tree felling/shaving, unnecessary land use, and destruction should be avoided as much as possible. All construction and operation working areas will be kept to a minimum to reduce habitat loss. Topsoil will be stored separately and used in the restoration works. All types of impact on natural habitats outside the Project footprint will be avoided during land clearance and topsoil removal. Boundaries of the construction areas, including traffic routes, will be limited only to designated sites. Off-road driving will be prohibited. Plans will be put in place to reduce all construction traffic activities. Devices or applications that generate odor, light, heat, and sound that will be perceived as a threat by wild animals will be minimized. Noise and exhaust emission measurements of the machinery-equipment will be performed periodically to prevent the wild animals in the project area and its immediate vicinity from being disturbed as much as possible. In addition, the use of horns and sound equipment 	Minor	Included in construction costs	Contractor Client	

LAND PREPARATION AND CONSTRUCTION PHASE							
Topic	Potential Impact / Risk	Type of Impact	Impact Significance (prior to mitigation)	Proposed Mitigation Measures	Residual Impact Significance	Cost Scale and Relevant Resources	Responsibility
				<p>that will make noise will be prevented and driving at night will be carried out after dimming the headlights.</p> <ul style="list-style-type: none"> • On-site vehicle speed limits will be implemented to avoid potential road-kills. • Dust suppression measures, such as water sprays, will be implemented for reduction of dust during the working period. • Throughout the Project, all construction and operational activities will adhere to international guidelines for the prevention and management of alien plant and animal species. • Any animals discovered during vegetation clearance or felling will be removed and relocated to a safe refuge. • The excess excavated material will not be dumped at the riverbeds outside the project area. • Waste will be stored temporarily at the designated storage areas and handled as per the provisions of the related national legislation and international standards. • All project workers will be made aware of the region's environmental and ecological sensitivities (natural habitats and threatened and protected species), as well as the Project site and project activities. Staff will be given pertinent information through staff induction, toolbox talks, leaflets, and office posters. • The project site's lighting will be kept to a minimum, and sensory lighting systems, rather than nightlong active lighting, will be considered. The lights will be aimed downwards. • Workers will be prohibited from killing or trapping wild animals for food or trade. Throughout the project areas, signage will be installed to reinforce the hunting ban. • Bulbs of <i>Cyclamen persicum</i> will be collected (March-April) and relocated to suitable habitats. • During the land preparation phase, the Common Tortoise (<i>Testudo graeca</i>) should be removed from the area and left to appropriate habitats. Due to the slow movement of the species and hibernation, Construction is recommended to be carried out outside the hibernation period (November-March) of the species. • Subsequent to translocation, the borders of the project area will be fenced to prevent this species to enter the site again. • Visual observations will be made on site before the land preparation activities to prevent damage to species or to minimize possible losses. • Before starting the construction, the species observed in the area should be removed. Species that do not move should be transported properly. • Translocated species will be monitored. • There will be no tree cutting/vegetation clearance other than the allocated areas for the project. • The excess excavated material will not be dumped at the riverbeds outside the project area. • Off-road driving will be prohibited. Plans will be put in place to reduce all construction traffic activities. • During the working hours, dust suppression measures will be put in place. • Habitats temporarily impacted by construction will be restored/reinstated on a 'like-for-like or better' basis, using the species identified during baseline surveys (native species only). • All of the species used in habitat restoration will be native. Non-native plant species will not be allowed to be introduced. Where restoration is not possible on-site (for example, under the footprint of permanent structures), similar habitat will be created elsewhere. • Limit Project activities to the construction area's boundaries, including traffic routes, to avoid impact on adjacent vegetation. • Preserve vegetation as much as feasible. • Keep land clearance of natural vegetation at minimum and restricted to designated sites. • Rehabilitate all destructed habitats as soon as possible. • Clear vegetation before nesting seasons of animals identified in the area. • The extent of clearing areas will be clearly marked out with appropriate flagging material prior to clearing. • Clearing must be done sequentially and in a way that directs escaping wildlife away from the clearing and into adjacent native vegetation or natural areas of their own accord. • If non-mobile fauna is discovered prior to or during clearing activities, it must be relocated from the clearing area to a safe and suitable location with microhabitat features, preferably within 200 meters of the capture location. • Train on-site employees about the importance of habitats and species, as well as fauna species nests, to avoid any destruction or displacement without an expert opinion on the status of the nests. Implement a training and awareness program in collaboration with biodiversity experts. • Ensure proper waste disposal avoiding natural habitats. • Avoid any destruction to habitats other than those at designated construction sites. • Allow for adaptive management and take additional measures if needed. • Warning signs will be placed on the access roads to the site and the speed limits will be set. • The herpetofauna species observed on the road will be moved off-road and the ones that move rapidly, such as snakes and lizzards, will be allowed to escape. • Especially during the land preparation and construction activities, the disturbing activities resulting noise, light, etc. will be minimized in April-June, which is the incubation period for avian species. 			

LAND PREPARATION AND CONSTRUCTION PHASE							
Topic	Potential Impact / Risk	Type of Impact	Impact Significance (prior to mitigation)	Proposed Mitigation Measures	Residual Impact Significance	Cost Scale and Relevant Resources	Responsibility
				<ul style="list-style-type: none"> The construction and operation staff will be prohibited from hunting. Mitigation measures provided in Section 5.12.5 will be taken to prevent intrusion and spread of invasive species. 			
Biological Environment	Indirect Environmental Impacts (dust, noise, waste, etc.)	Adverse	Moderate	<ul style="list-style-type: none"> Avoidance of unnecessary revving of engines and switch off equipment when not in use. Vehicles and equipment will be properly maintained to meet the manufacturers' noise rating levels. Any silencers or bearings which become defective would be replaced as soon as possible. Using reverse warning systems incorporating broadband noise where practicable. Using enclosures for noisy plant such as pumps or generators. Minimising drop height of materials. Limiting the use of particularly noisy plant or vehicles where practicable. Plant and vehicles will be operated with noise control hoods closed. Artificial lighting used on construction sites and camps at night will be shaded and directed downwards to avoid light spillage and disturbance to birds or other wildlife. 	Minor	Included in construction costs	Contractor Client
SOCIO-ECONOMIC ENVIRONMENT							
Socio-Economic Environment	Local recruitment and local procurement	Positive	High	<ul style="list-style-type: none"> The actions and measures to be taken for the labor and employment will be in compliance with Turkish Labor Law and international standards. Prioritization will be given to the local recruitment. The recruitment processes will be transparent, public, and non-discriminatory, providing equal opportunities with respect to ethnicity, religion, language, gender and sexuality. The employment opportunities will be disclosed explicitly through different channels. A workers grievance mechanism will be in place. 	High	Included in construction costs	Contractor Client
Labour and Working Conditions	Working Conditions and Management of Worker Relationship	Adverse	Moderate	<ul style="list-style-type: none"> All project personnel will comply with the requirements specified in this ESIA and other submanagement plans prepared for the project. OHS Management Plan will be implemented, and the workers will be trained on this Plan in accordance with the Regulation on the Procedures and Principles of Occupational Health and Safety Training. Safe working environments will be created at the work sites. The Client and its contractor(s) will ensure that Code of Conduct and public awareness training are given to all employees at the very beginning of the recruitment process, which will be also refreshed during the work period. Trainings will cover workers' rights, contract requirements, Code of Conduct, grievance mechanism and contact channels. Compliance with the rules of code of conduct, including gender-based violence, sexual harassment, sexual exploitation and abuse, which are included in the trainings to be provided, will be in the contract articles of the personnel. The sanctions for non-compliance with the code of conduct will be clearly stated in the contract. All employees will be provided with personal protective equipment (PPE) and necessary training will be provided for their use. Work areas will be equipped with warning signs in accordance with the nature and potential risks of the work to be done in that area. All necessary precautions will be taken in the project area to prevent fires. An infirmary will be in place at the project area. In emergencies that require intervention, the personnel will be referred to the nearest health center by appropriate vehicles. Drivers and operators will be trained to comply with traffic rules and the Traffic Management Plan. Required traffic signs will be placed at the project site and its surroundings. The areas to be excavated will not be accessible except by authorized personnel. Loading and unloading activities are carried out together with an accompanying person. The project site will be fenced and a security personnel will be employed. Public access to these areas will be restricted. An adequate OHS organizational structure will be established as defined in local legislation. OHS Personnel will inspect the site daily. An Emergency Preparedness and Response (EPR) Plan will be implemented and the issues about the communicable diseases and the COVID-19 pandemic will be covered. Wastes will not be disposed of at the construction site or disposed of in a way that is harmful to health. The workers will be informed about the worker grievance mechanism at the time of recruitment. 	Minor	Included in construction costs	Contractor Client
Labour and Working Conditions	Protecting the Workforce	Adverse	Moderate	<ul style="list-style-type: none"> Employment of child labor and forced labor will be prevented. Workers will be provided with documented information that is clear and understandable, regarding their rights under national labor law; including collective agreements, their rights related to hours of work, wages, overtime, compensation, and benefits as of start-up of working relationship and when any material changes occur, Particular concern will be paid on principles of non-discrimination and equal opportunity. Wages, work hours and other benefits will be 	Minor	Included in construction costs	Contractor Client

LAND PREPARATION AND CONSTRUCTION PHASE								
Topic	Potential Impact / Risk	Type of Impact	Impact Significance (prior to mitigation)	Proposed Mitigation Measures	Residual Impact Significance	Cost Scale and Relevant Resources	Responsibility	
				<ul style="list-style-type: none"> per the Turkish Labor Law, The contractor(s) will not discourage workers from electing worker representatives, forming or joining workers' organizations of their choosing, or bargaining collectively, and will not discriminate or retaliate against workers who participate, or seek to participate, in such organizations and collective bargaining. The workers will be informed about the worker grievance mechanism. The Client and the contractor(s) will ensure that unregistered employment is avoided, especially considering Syrian refugee population living in the region. A Labour Management Plan will be implemented for the Project and the personnel will be trained on this Plan. 				
Labour and Working Conditions	Workers Engaged by Third Parties and the Supply Chain	Adverse	Moderate	<ul style="list-style-type: none"> Subcontractors will be reputable and legitimate enterprises and have an appropriate ESMS that will allow them to operate in a manner consistent with the labor conditions requirements, The performance of subcontractors will be monitored such that human rights policy and labor rights of all workers are exercised properly, The workers of subcontractors will have access to the grievance mechanism. 	Minor	Included in construction costs	Contractor Client	
Community Health and Safety	Impacts/risks related to traffic and transport	Adverse	Moderate	<ul style="list-style-type: none"> A Traffic Management Plan will be implemented to minimize potential traffic related impacts on the workers and nearby settlements areas and the personnel will be trained on the plan. Traffic signs will be posted considering the provisions of the Regulation on Traffic Signs. Traffic arrangements will be made considering the routine use of the roads by the local residents. The speed limits stipulated in Regulation on Highway Traffic will be strictly followed. Project personnel will be trained for safe driving. A grievance mechanism will be in place. 	Minor	Included in construction costs	Contractor Client	
Community Health and Safety	Community Health and Safety	Adverse	Moderate	<ul style="list-style-type: none"> A Community Health and Safety Management Plan will be implemented, and the personnel will be trained on this management plan; The construction activities will be performed in a way not to give any damage to the utilities located in the working area. Security personnel will be employed to regularly monitor the facility and its surroundings. Entry to the construction site will be carried out in a controlled manner by the security personnel. Emergency situations will be handled appropriately and in a timely manner, taking into account the elements specified in the Emergency Preparedness and Response Plan. it is significant to create an environment for the people to raise their concerns by informing them about the project, to hold regular stakeholder engagement activities in the settlements, and to create the opportunity to address the concerns of those who oppose the project. A grievance mechanism will be in place. 	Minor	Included in construction costs	Contractor Client	
Land acquisition	Income loss	Adverse	Moderate	<ul style="list-style-type: none"> Relevant impacts and their measure to mitigate possible income loss on especially vulnerable groups (including Yoruks) are given both in ESIA and LARAP. In case of encountering any unexpected impacts, measurements on livelihood restoration and / or compensation should be evaluated in parallel to income losses of PAPs. Project specific LARAP will be implemented incorporate with ESIA. 	Minor	Included in construction costs	Contractor Client	

Table 8. Mitigation Management Plan for Operation Phase

OPERATION PHASE							
Topic	Potential Impact / Risk	Type of Impact	Impact Significance (prior to mitigation)	Proposed Mitigation Measures	Residual Impact Significance	Cost Scale and Relevant Resources	Responsibility
PHYSICAL ENVIRONMENT							
Land Use, Soil, Geology and Natural Hazards	Soil Contamination	Adverse	Minor	<ul style="list-style-type: none"> Waste and Wastewater Management Plans will be implemented. Integrity of the septic tank will be control periodically. Discharge of hazardous materials and wastes into soil will be forbidden. Secondary containment structures and spill kits should be utilized along with the implementation of the Emergency Preparedness and Response Plan. 	Negligible	Included in operation costs	Client
Water Resources, Water Quality and Wastewater	Change in Surface Water Quality	Adverse	Minor	<ul style="list-style-type: none"> Environmental and Social Management Plan along with Waste and Wastewater Management Plans and Emergency Preparedness and Response Plan will be implemented for the operation phase. Necessary trainings about the management plan for the all-project personnel including sub-contractor(s) will be provided to create awareness on waste management practices such as zero waste. Domestic wastewater generated during the construction and operation phases will be collected in leak-proof septic tanks and periodically vacuumed before reaching occupancy rate of 80-90% via vacuum trucks and collected by the General Directorate of Hatay Water and Sewerage Administration following the Water Pollution Control Regulation and the HATSU Tariffs Regulation. Integrity of the septic tank should be checked regularly. Incineration or burying of wastes by any means at site and/or dumping of wastes to nearby roads or water resources will not be in question. 	Negligible	Included in operation costs	Client
	Change in Groundwater Quality	Adverse	Minor		Negligible	Included in operation costs	Client
	Improper Waste and Wastewater Management	Adverse	Minor		Negligible	Included in operation costs	Client
Air Quality and GHG Emissions	Climate Change Physical Risks (heat stress / hot days, changing precipitation / extreme rain events, wind / storms, sea level rise / floods)	Adverse	Minor	<ul style="list-style-type: none"> Heat stress mitigation, climate-controlled equipment, equipment maintenance and monitoring, implementation of emergency plans Resilience of SPP infrastructure and viable supply chain strategies for efficient water management Structural fortification to enhance resilience against wind forces, preparation and implementation of diligent emergency Implementation of flood preparedness and response, investment of flood-resistant infrastructure, and maintenance of appropriate insurance coverage strategy. 	Negligible	Included in operation costs	Client
Noise Levels	Increase in Noise Levels	Adverse	Negligible	<ul style="list-style-type: none"> During the procurement of the machinery and equipment, the sound levels in the technical specifications will be considered. Grievance Mechanism of the project will be in place. In case of any grievance, urgent corrective and preventive action(s) will be taken, and necessary measurement will be performed. Maintenance of the plant components including transformers, inverters etc. and vehicles utilized for transportation will be performed on a regular basis in order to ensure their good working conditions. Architectural design will emphasise the selection of structures and building materials, as well as soundproofing, to keep the noise level at the lowest possible level during the operation of the plant to reduce noise and minimise its impact. 	Negligible	Included in operation costs	Client
Waste and Resource Management	Inadequate Management of Waste	Adverse	Moderate	<ul style="list-style-type: none"> A project-specific Waste Management Plan will be implemented. Training covering waste generation according to the waste management hierarchy (the prevention, reduction, reuse, recycling and finally disposal) will be provided for personnel to raise awareness. An Industrial Waste Management Plan will be prepared and in place. Regular on-site inspections of solid waste management will be performed. Hazardous Materials and Hazardous Waste Compulsory Liability Insurance will be executed for the hazardous waste temporary storage area. There will not be any waste burning, disposing, or burying activities under any circumstances. The transportation of wastes will be ensured in appropriate frequencies so that the storage capacities are not exceeded. It will be ensured by trainings that wastes are not dumped at locations other than areas specifically designated for this purpose. Waste recycling/recovery/disposal agreements with the authorized municipality or licensed firm will be executed for the management of hazardous and non-hazardous wastes. Official waste declarations for all waste generated will be submitted to the online system of MoEUCC. Grievance Mechanism of the project will be in place. In case of any grievance, urgent corrective and preventive action(s) will be taken. 	Minor	Included in operation costs	Client

OPERATION PHASE							
Topic	Potential Impact / Risk	Type of Impact	Impact Significance (prior to mitigation)	Proposed Mitigation Measures	Residual Impact Significance	Cost Scale and Relevant Resources	Responsibility
	Additional load on existing waste management facilities	Adverse	Minor	<ul style="list-style-type: none"> A project-specific Waste Management Plan will be implemented. Training covering waste generation according to the waste management hierarchy (the prevention, reduction, reuse, recycling and finally disposal) will be provided for personnel to raise awareness. An Industrial Waste Management Plan will be prepared and in place. Regular on-site inspections of solid waste management will be performed. Hazardous Materials and Hazardous Waste Compulsory Liability Insurance will be executed for the hazardous waste temporary storage area. There will not be any waste burning, disposing or burying activities under any circumstances. The transportation of wastes will be ensured in appropriate frequencies so that the storage capacities are not exceeded. It will be ensured by trainings that wastes are not dumped at locations other than areas specifically designated for this purpose. Waste recycling/recovery/disposal agreements with the authorized municipality or licensed firm will be executed for the management of hazardous and non-hazardous wastes. Official waste declarations for all waste generated will be submitted to the online system of MoEUCC. 	Negligible	Included in operation costs	Client
Landscape and Visuality	Solar reflections and flare	Adverse	Minor	<ul style="list-style-type: none"> Monocrystalline photovoltaic panels will be used to ensure the maximum absorption of the sunlight and to minimize the glare effect. The panels to be installed will be placed in such a way that they do not cause glare in the eyes of vehicle drivers using the highway. To ensure safe traffic flow, structural arrangements (signs, etc.) that physically prevent the passage of reflected light on the road along the expropriation boundary of the road will be designed by the investor company and implemented on site. Points that pose a reflection risk will be identified in terms of possible reflection and glare effects, and vegetative or artificial privacy screens will be installed at the necessary points according to visual monitoring and complaints from surrounding settlements during the first year of operation. TS EN 62305-1 (General Rules), TS EN 62305-2 (Risk Management), TS EN 62305-3 (Physical Damage and Danger to Life in Buildings) and TS EN 62305-4 (Lightning Protection - Part 4: Electrical and Electronic Systems in Buildings) published by the Turkish Standards Institute on lightning protection must be followed. The economic benefit of installing lightning protection measures and selecting suitable protection measures is carried out according to risk management procedures. Risk management is the subject of TS EN 62305-2 and appropriate measures will be taken by carrying out the necessary field studies and inspections before the start of the operational phase. The ecological monitoring studies will be conducted for two years (30 days in the spring and 30 days in the autumn) and monitoring reports to be prepared will be submitted to the General Directorate of Nature Conservation and National Parks. 	Negligible	Included in operation costs	Client
Cultural Heritage	Destruction or deliberate damage to cultural heritage	Adverse	Moderate	<ul style="list-style-type: none"> The Chance Find Procedure, based on national laws, international standards and best practices, will be applied. In case of a chance find, all activities will be ceased, Hatay Regional Council will be contacted, and the site will be secured the Contractor. The experts of Hatay Regional Council will properly secure chance find site via flagging, no-entry signs, etc., prevent/limit the vehicle traffic within the immediate vicinity of chance find, and protect the site by not moving, removing or further disturbing the chance find. Coordinates of the chance find will be recorded and photographed. The site and its vicinity will be secured against damage or loss until a final decision is made about this site by the Council. 	Minor	Included in operation costs	Client
BIOLOGICAL ENVIRONMENT							
Biological Environment	Disturbance on flora and fauna	Adverse	Moderate	<ul style="list-style-type: none"> Project Specific BAP and BMP will be implemented. The area will be surrounded by a fence to prevent species from entering the area. Common Tortoise (<i>Testudo graeca</i>) will be removed from the area if detected and translocated to appropriate habitats. The nests of the bird species will not be disturbed / damaged. Devices or applications that generate odor, light, heat and sound that will be perceived, as a threat by wild animals will be minimized. The project site's lighting will be kept to a minimum, and sensory lighting systems, rather than nightlong active lighting, will be considered. The lights will be aimed downwards. Workers will be prohibited from killing or trapping wild animals for food or trade. Throughout the project areas, signage will be installed to reinforce the hunting ban. The construction and operation staff will be prohibited from hunting. 	Minor	Included in operation costs	Client

OPERATION PHASE							
Topic	Potential Impact / Risk	Type of Impact	Impact Significance (prior to mitigation)	Proposed Mitigation Measures	Residual Impact Significance	Cost Scale and Relevant Resources	Responsibility
				<ul style="list-style-type: none"> The ecological monitoring studies will be conducted for one year (30 days in the spring and 30 days in the autumn) and monitoring reports to be prepared will be submitted to the General Directorate of Nature Conservation and National Parks. It is recommended to consider single level powerline cable arrangements, where applicable, and to equip ETL towers and powerlines with bird flight diverters / deterrents and/or static wire marking to reduce potential risks to soaring birds in the area. Check that the diverters are visible to birds at night. To avoid electrocutions, the pylon design should be appropriate. Mitigation measures provided in Section 5.12.5 will be taken to prevent intrusion and spread of invasive species. 			
SOCIO-ECONOMIC ENVIRONMENT							
Socio-Economic Environment	Local recruitment and local procurement	Positive	High	<ul style="list-style-type: none"> The actions and measures to be taken for the labor and employment will be in compliance with Turkish Labor Law and international standards. Prioritization will be given to the local recruitment. The recruitment processes will be transparent, public and non-discriminatory, providing equal opportunities with respect to ethnicity, religion, language, gender and sexuality. The employment opportunities will be disclosed explicitly through different channels. A workers grievance mechanism will be in place. 	High	Included in operation costs	Client
Labour and Working Conditions	Working Conditions and Management of Worker Relationship	Adverse	Moderate	<ul style="list-style-type: none"> All project personnel will comply with the requirements specified in this ESIA and other submanagement plans prepared for the project. OHS Management Plan will be implemented and the employees will be trained on this Plan in accordance with the Regulation on the Procedures and Principles of Occupational Health and Safety Training. Safe working environments will be created at the work sites. The Client will ensure that Code of Conduct and public awareness training are given to all employees at the very beginning of the recruitment process, which will be also refreshed during the work period. Trainings will cover workers' rights, contract requirements, Code of Conduct, grievance mechanism and contact channels. Compliance with the rules of code of conduct, including gender-based violence, sexual harassment, sexual exploitation and abuse, which are included in the trainings to be provided, will be in the contract articles of the personnel. The sanctions for non-compliance with the code of conduct will be clearly stated in the contract. All employees will be provided with personal protective equipment (PPE) and necessary training will be provided for their use. Work areas will be equipped with warning signs in accordance with the nature and potential risks of the work to be done in that area. All necessary precautions will be taken in the project area to prevent fires. An infirmary will be in place at the project area. In emergencies that require intervention, the personnel will be referred to the nearest health center by appropriate vehicles. Drivers and operators will be trained to comply with traffic rules and the Traffic Management Plan. Required traffic signs will be placed at the project site and its surroundings. The project site will be fenced and a security personnel will be employed. Public access to these areas will be restricted. An adequate OHS organizational structure will be established as defined in local legislation. OHS Personnel will inspect the site on a daily basis. An Emergency Preparedness and Response (EPR) Plan including the issues about the communicable diseases and the COVID-19 pandemic will be implemented. Wastes will not be disposed of at the project site or disposed of in a way that is harmful to health. The workers will be informed about the worker grievance mechanism at the time of recruitment. 	Minor	Included in operation costs	Client
Labour and Working Conditions	Protecting the Workforce	Adverse	Moderate	<ul style="list-style-type: none"> Employment of child labor and forced labor will be prevented. Employees will be provided with documented information that is clear and understandable, regarding their rights under national labor law; including collective agreements, their rights related to hours of work, wages, overtime, compensation, and benefits as of start-up of working relationship and when any material changes occur, Particular concern will be paid on principles of non-discrimination and equal opportunity. Wages, work hours and other benefits will be per the Turkish Labor Law, The Client will not discourage workers from electing employee representatives, forming or joining workers' organizations of their choosing, or bargaining collectively, and will not discriminate or retaliate against workers who participate, or seek to participate, in such organizations and collective bargaining. The employees will be informed about the worker grievance mechanism. 	Minor	Included in operation costs	Client

OPERATION PHASE							
Topic	Potential Impact / Risk	Type of Impact	Impact Significance (prior to mitigation)	Proposed Mitigation Measures	Residual Impact Significance	Cost Scale and Relevant Resources	Responsibility
				<ul style="list-style-type: none"> The Client will ensure that unregistered employment is avoided, especially considering Syrian refugee population living in the region. A Labor Management Plan will be implemented and the personnel will be trained on this Plan 			
Labour and Working Conditions	Workers Engaged by Third Parties and the Supply Chain	Adverse	Moderate	<ul style="list-style-type: none"> If to be employed for the operation phase, subcontractors will be reputable and legitimate enterprises and have an appropriate ESMS that will allow them to operate in a manner consistent with the labor conditions requirements, The performance of subcontractors will be monitored such that human rights policy and labor rights of all workers are exercised properly, The workers of subcontractors will have access to the grievance mechanism. 	Minor	Included in operation costs	Client
Socio-Economic Environment	Impacts/risks related to traffic and transport in terms of Community Health and Safety	Adverse	Moderate	<ul style="list-style-type: none"> A Traffic Management Plan will be implemented to minimize potential traffic related impacts on the workers and nearby settlements areas and the personnel will be trained on the plan. Traffic signs will be posted considering the provisions of the Regulation on Traffic Signs. Traffic arrangements will be made considering the routine use of the roads by the residents. The speed limits stipulated in Regulation on Highway Traffic will be strictly followed. Project personnel will be trained for safe driving. A grievance mechanism will be in place. 	Minor	Included in operation costs	Client
Community Health and Safety	Risks on Community Health and Safety	Adverse	Moderate	<ul style="list-style-type: none"> A Community Health and Safety Management Plan will be implemented, and the personnel will be trained on this management plan; Security personnel will be employed to regularly monitor the facility and its surroundings. Entry to the project area will be carried out in a controlled manner by the security personnel. Emergency situations will be handled appropriately and in a timely manner, taking into account the elements specified in the Emergency Preparedness and Response Plan. It is significant to create an environment for the people to raise their concerns by informing them about the project, to hold regular stakeholder engagement activities in the settlements, and to create the opportunity to address the concerns of those who oppose the project. A grievance mechanism will be in place. 	Minor	Included in operation costs	Client
Land acquisition	Income loss	Adverse	Moderate	<ul style="list-style-type: none"> Relevant impacts and their measure to mitigate possible income loss on especially vulnerable groups (including Yoruks) are given both in ESIA and LARAP. In case of encountering any unexpected impacts, measurements on livelihood restoration and / or compensation should be evaluated in parallel to income losses of PAPs. Project specific LARAP will be implemented incorporate with ESIA. 	Minor	Included in operation costs	Client

4.14 Stakeholder Engagement and Grievance Mechanism

4.14.1 Stakeholder Matrix

Stakeholders can have specific needs to appropriate conditions for participation to the engagement process. These conditions vary in accordance with stakeholder's limitations caused by transportation, health, education, social, economic, language and cultural situations. As a result, these limitations can determine specific communication techniques. The following stakeholder matrix has been organized in line with the project stakeholder needs.

In order to ensure equal and fair stakeholder participation, stakeholders should be identified at the first stage of the activity. It is also important to determine which consultation strategy (directly or indirectly) will be implemented for each affected group. Following Table 4 summarizes these details regarding the consultation and disclosure process.

Table 9. Stakeholder Matrix

Stakeholder Groups	Affected or Interested Parties	Information to be Shared	Engagement Method	Specific Needs (accessibility, large print, childcare, daytime meetings)
National and local government institutions and organizations (Ministry of Environment, Urbanization and Climate Change, Hatay Provincial Directorate of Environment, Urbanization and Climate Change, Erzin Municipality etc.)	Other Interested Party	<ul style="list-style-type: none"> Non-technical summary of the project and Stakeholder Engagement Plan Current developments about the project 	<ul style="list-style-type: none"> Public Information and Participation Meeting Consultation meetings In-depth interviews Project Brochures Presentations Grievance Mechanism 	<ul style="list-style-type: none"> By holding special meetings for disabled people within the relevant institutions, they should also be included into disclosure processes, if any
Yukarıburnaz Neighborhood and Hürriyet Neighborhood	Project Affected Party	<ul style="list-style-type: none"> Non-technical summary of the activity and Stakeholder Engagement Plan Information about land acquisition process Current developments about the project Grievance Mechanism Procedure 	<ul style="list-style-type: none"> Consultation meetings Socio-economic research Brochures and posters to be hung in public places (cafe, headman's building, town hall, etc.) Project brochures Presentations Grievance Mechanism Free hotline 	<ul style="list-style-type: none"> The written documents can be reproduced in more visual formats for expanding acknowledgment level among illiterate residents, if any. The printed documents can be delivered not only male-dominated area both also common areas for females such as village oven. In comparison with identity of majority, the less common mother languages can be included to printed

Stakeholder Groups	Affected or Interested Parties	Information to be Shared	Engagement Method	Specific Needs (accessibility, large print, childcare, daytime meetings)
				documents. Besides, specific meeting can be organized for minorities in different languages.
PAPs that may be disadvantaged or vulnerable (e.g. elderly, disabled, women, etc.)	Project Affected Party	<ul style="list-style-type: none"> Information about the land acquisition process and its effects and entitlements. Grievance Mechanism Procedure Current developments about the project Non-technical summary of the project 	<ul style="list-style-type: none"> Consultation meetings Socio-economic research group Focus discussions Project brochures Presentations Grievance Mechanism Free hotline 	<ul style="list-style-type: none"> By holding special meetings for disabled people among the residents, they should also be included into disclosure processes, if any
Employees of the Project and contractors	Project Affected Party	<ul style="list-style-type: none"> Grievance Mechanism Procedure for project and contractor employees Current developments about the project Code of Conduct for Employees 	<ul style="list-style-type: none"> Occupational safety meeting Brochures and posters to be hung in work areas Presentations Grievance Mechanism Free hotline 	<ul style="list-style-type: none"> Internal grievance mechanism should cover workerbased procedures and implementation. In-house trainings should include not only occupation-based worker but also all project staff including subcontractors.
Universities and Non-Governmental Organizations	Project Interested Party	<ul style="list-style-type: none"> Non-technical summary of the activity and Stakeholder Engagement Plan Current developments related to the activity. Grievance Mechanism Procedure 	<ul style="list-style-type: none"> Consultation meetings Periodic information activities 	<ul style="list-style-type: none"> The announcement should frequently repeated on different information source such as official website and official social media platforms to catch interested groups
Media	Project Interested Party	<ul style="list-style-type: none"> Non-technical summary of the activity and Stakeholder Engagement Plan Current developments related to the activity. Grievance Mechanism Procedure 	<ul style="list-style-type: none"> Press conferences and meetings Press release communications Interviews 	<ul style="list-style-type: none"> The announcement should frequently repeated on different information source such as official website and official social media platforms to catch interested groups

4.14.2 Stakeholder Engagement Program and Methods

Information Disclosure

Stakeholder engagement is an ongoing process that begins before the development of this SEP and will continue throughout the life of the Project. The project owner will be in active communication with identified stakeholders throughout the life of the project. In particular, the Project owner will demand feedback from stakeholders on the environmental and social performance of the project and the implementation of the identified mitigation measures. If there are significant changes in the project resulting in additional risks and impacts, particularly where they will affect project affected parties, the Project owner will provide information on these risks and impacts and consult with project affected parties on how to mitigate these risks and impacts.

Engagement Activities

At which stage of the project which stakeholder engagement activity will be carried out and which methods will be used are detailed in Table 10 and Table 11, respectively.

Table 10. Stakeholder Engagement during Baseline Data Collection

Engagement Method	Location (If Applicable)	Stakeholder Groups
Consultancy meetings	Project affected settlements	Yukarıburnaz Neighborhood and Hürriyet Neighborhood
Socio-economic studies	Project affected settlements	Yukarıburnaz Neighborhood and Hürriyet Neighborhood
Project brochures	Districts and settlements within the project boundaries	All
Grievance mechanism	Project affected settlements	Yukarıburnaz Neighborhood and Hürriyet Neighborhood
Hotline	Non-applicable	All
Corporate website	Non-applicable	All
Trainings	Non-applicable	Internal Stakeholders (Workers and Project Staff)

Table 11. Stakeholder Engagement during Construction and Operation

Engagement Method	Location (If Applicable)	Stakeholder Groups	Information to be Shared	Frequency
Consultancy meetings	Project affected settlements	Yukarıburnaz Neighborhood and Hürriyet Neighborhood	<ul style="list-style-type: none"> •Non-technical summary of the activity and Stakeholder Engagement Plan •Information about land acquisition process •Current developments about the project •Grievance Mechanism Procedure 	Once in six (6) months
In-depth interviews	Districts and settlements within the project boundaries	National and local government agencies and organizations, cooperatives and other interested groups	<ul style="list-style-type: none"> •Public Information and Participation Meeting •Consultation meetings •In-depth interviews •Project Brochures •Presentations •Grievance Mechanism 	Once in six (6) months
Focus-Group Interviews	Project affected settlements	PAPs (vulnerable groups e.g. elderly people, people with disabilities, women etc.)	<ul style="list-style-type: none"> •Information about the land acquisition process and its effects and entitlements. •Grievance Mechanism Procedure •Current developments about the project •Non-technical summary of the project 	Once in six (6) months
Press releases	Non-applicable	Media	<ul style="list-style-type: none"> •Press conferences and meetings •Press release communications •Interviews 	Important dates of the project

Engagement Method	Location (If Applicable)	Stakeholder Groups	Information to be Shared	Frequency
Presentations	Districts and settlements within the project boundaries	All	<ul style="list-style-type: none"> •Non-technical summary of the activity and Stakeholder Engagement Plan •Information about land acquisition process •Current developments about the project •Grievance Mechanism Procedure 	Once in a year
Grievance mechanism	Focus on the construction site	All	Grievance Mechanism Procedure	As needed
Hotline	Non-applicable	All	<ul style="list-style-type: none"> •Non-technical summary of the activity and Stakeholder Engagement Plan •Information about land acquisition process •Current developments about the project •Grievance Mechanism Procedure 	As needed
Corporate website	Non-applicable	All	<ul style="list-style-type: none"> •Non-technical summary of the activity and Stakeholder Engagement Plan •Information about land acquisition process •Current developments about the project •Grievance Mechanism Procedure 	As needed
Trainings	Non-applicable	Internal Stakeholders (Workers and Project Staff)	<ul style="list-style-type: none"> •AIIB ESF and ESSs •Labor Rights •On-the-Job training •Vocational trainings •Procedure and Policy of Human Resources •Prevention of Discrimination and Harassment Incidents in Workplaces •Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH) •Prevention of Forced Labor, Child Labor and Modern Slavery 	As needed

Training

The Instruction for the Implementation of Training Activities should include the following headings as a framework (see Table 12).

- In the last of each year, the “Training Request Form” is sent by the human resources chief to the unit managers for the preparation of the training plan for the next year and the training needs are requested.
- After the collection of the records, the Annual Training Plan is prepared
- The Annual Training Plan is distributed to the relevant units and announced
- After the organized trainings, the evaluation of the training effectiveness is made and submitted to the management with the “End of Year Training Activities Report”
- The data obtained are kept by the human resources chief.

Table 12. Training Programs within Engagement Activities

Responsible Part	Departments	Issue
IC İÇTAŞ	Administrative Affairs	AIIB ESF and ESSs Project Management Management of Environmental and Social Risk Quality Systems Sustainable Development Data security
	Human Resources	AIIB ESF and ESSs

Responsible Part	Departments	Issue
		Labor Rights On-the-Job training Vocational trainings Procedure and Policy of Human Resources SEA/SH Prevention of Gender Based Violence and Harassment Prevention of Forced Labor, Child Labor and Modern Slavery
	Occupational Health and Safety & Environment	AIIB ESF and ESSs Occupational Health and Safety First Aid Emergency Preparedness and Emergency Response Waste and Wastewater Management Air Quality Management Noise Management Resource Efficiency Sustainable Resource Management
	Community Liaison Officers (CLOs) Human Resources	AIIB ESF and ESSs Internal and External Grievance Mechanism (GM) Procedures Stakeholder Engagement Plan (SEP)
	Biodiversity specialist	Biodiversity Conservation and Sustainable Management of Living Natural Resources
	Archaeologist	Cultural Heritage Management Plan Chance Find Procedure

Engagement Activities

The tools and methods defined for stakeholder engagement have been diversified and expanded in order to enable all stakeholders to access the Project through the means of their choice and most convenient access.

Covid-19, which started in the first months of 2020 and whose effects are still ongoing, necessitated a planning that prioritizes safety and health in the stakeholder engagement process. For this reason, stakeholder engagement activities were carried out using appropriate methods in accordance with Covid-19 measures and restrictions.

The methods and tools of stakeholder engagement of the project are described below. First of all, the methods and tools that are suitable for the restrictions and measures in the Covid-19 process were explained, then the methods and tools that are recommended to be used when the new normalization process is started and when the conditions are suitable, or those require being together, were defined. The following methods and materials have been used within the scope of participation from the scoping phase of the project to the completion of the project.

Consultation Meetings: Consultation meetings were held when required during the project process. Stakeholders were given detailed information about the Project and their questions and opinions were evaluated. Consultation meetings will continue to be held as required during periods or issues that warrant the Project's consultation with stakeholders. In cases where consultation was required, consultations were held using online tools during the Covid-19 process, and stakeholder consultations were held face-to-face after the new normalization process, which is convenient conditions. In these meetings, the current developments of the project were explained, information was given about the resettlement / relocation process, and ideas and expectations were discussed during these processes.

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In-Depth Interview: In-depth interviewing is a qualitative research technique that involves intensive individual interviews with a small number of participants to examine their perspectives on a particular idea, program or situation. In this case, interview is conducted with national and local government agencies / organizations, cooperatives etc. to analyze the potential impacts of the Project on management and businesses and to evaluate their expectations/advice through planning. In-depth interviews were conducted with stakeholders. In-depth interviews were conducted in a way of face-to-face meetings, by taking into account the Covid-19 process.

Focus Group Interview: Focus group interviews were conducted when there was a need for data collection and qualitative fieldwork during the monitoring process. Focus group studies, which were held in a way of face-to-face meetings, were carried out face-to-face with the convenient conditions after the new normalization process, by taking into account the Covid-19 process. It is an effective way to bring people from similar experiences together to discuss a specific topic related to the project.

Socio-Economic Studies: Economic and social conditions affect each other positively or negatively. There is a direct connection between economic factors such as livelihoods of the society, income level, jobs and unemployment etc. with social life. Therefore, economic parameters determine social standards. Within the scope of the project, studies were carried out in order to conceive the socio-economic status of the stakeholder groups.

Survey Study: Survey studies were used for data collection during the Project process and were carried out in a way of face-to-face, taking into account the Covid-19 process, as conditions allow, after the new normalization process.

Presentations: Visual materials were also used during the informing phase of the stakeholders. Presentations containing summaries of written documents were made.

Project Brochure: At the first stage, brochures / flyers containing communication channels, announcements and information about the Project were left to the common public areas in the surrounding settlements, headmen, municipalities, provincial directorates and stakeholder professional chambers.

Grievance Mechanism: The Grievance Mechanism will be open to all stakeholders throughout the duration of the project, including recording grievances, taking action for resolution and closing grievances by providing necessary information.

Letter / mail: Project brochures, postings, reports or announcements can be sent by mail, courier or letter when necessary so that stakeholder groups or individuals who do not have access to the Internet, smartphones, social media or e-mail can access Project information and be an effective part of the Stakeholder engagement process.

Hotline: There will be a hotline that all stakeholders can use to raise their concerns and complaints. This method is important in terms of solving the urgent problems of the stakeholders and being fast.

Corporate Website: The corporate website provides announcements, Project documents, reports and contact information for further information requests.

Covid-19 Conditions: The Covid-19 pandemic has affected the whole world and measures such as wearing masks and keeping social distance in society have become the new normal of our daily lives. If the Covid-19 pandemic conditions continue during the operation phase of the project and the implementation of this SEP, the stakeholder engagement plan and activities will be aligned and implemented in accordance with the guidelines of relevant and

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responsible national and international organizations such as World Health Organization (WHO), Republic of Türkiye Ministry of Health (MH) and MoEUCC.

Within the scope of SEP, face-to-face meetings were held in accordance with the mask and social distance rules of the MH and WHO. In cases where face-to-face meeting is not possible due to Covid-19 conditions, online interview methods can also be used. In addition, it was ensured that the meetings to be held in open spaces in accordance with social distance and other regulations of the MH and WHO.

Apart from these measures, other practices mentioned in the “Interim Recommendation to IFC Clients on Secure Stakeholder Engagement in the Context of Covid-19” and Precautions Interim Note: Covid-19 Considerations in Construction Projects can also be used in the planning of stakeholder engagement activities.

All the submission should be recorded through a Grievance Log Document. Firstly, all submission should be categorized as feedback, question, concern, grievance and complaint. Secondly, the submission should be also categorized according to their scope such as environment, community health and safety, security, project related risks etc. In addition, all the records should have a registration date and due date to track mandatory legal response process. Especially, required actions to be taken and closure time should be included to grievances registration and the relevant data have to be easily accessed by assigned staff and the other reviewer.

5 TRAININGS

All employees will be provided with training on environment, social, occupational health and safety, labor and security issues by suitably qualified personnel. The following subjects will be covered in these training programs for all employees:

- National and international legislations and its applicability to the Project,
- Roles and responsibilities,
- Environmentally sensitive areas,
- Potential effects of activities,
- The steps and timing required to protect the environment,
- Activities to be avoided,
- Requirements of equipment use in the event of incident and procedures to follow,
- Mitigation measures to implement in the Project,
- Implementation of Environmental and Social Management and Monitoring Plan and sub-plans.

Details of the trainings within the scope of requirements of this ESMP are also presented in Table 13.

Table 13. Trainings Related to Environmental and Social Management

Training	Trainer	Participants	Period	Content
Introduction Training	Environmental Specialist/Responsible	Newly-recruited Personnel Personnel of newly-contracted subcontractor-service provider.	Whenever needed	Requirements of ESMP, Procedures to follow and mitigation measures of ESMP, Roles and responsibilities of employees in the ESMP
Environmental Management System Awareness Training	Environmental Specialist/Responsible	All personnel	Once in a year	Environmental policy, The content of environmental policy, Liabilities and Interested parties
Internal Inspectors/ Group Leader Training	Environmental Specialist/Responsible	Internal Inspectors/ Group Leaders	Once in a year and/or when a new participant hired	Provision of details of responsibilities of internal inspectors / group leaders who shall continuously inspect environmental and social management aspects to reach assigned targets during operation phase.

Moreover, Environmental and Social Training, Spill Response Training and Human Resources Orientation Training were performed to the employees by İÇTAŞ on 24-26.10.2023 and 21.12.2023.

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6 MONITORING AND REPORTING

Environmental monitoring during project implementation provides information about key environmental and social aspects of the project, particularly the environmental and social impacts/risks of the project and the efficiency of implemented mitigation measures. Such information enables the Client to evaluate the success of mitigation as part of project supervision and allows corrective action to be taken when needed.

Accordingly, the monitoring plan provides;

- (a) A specific description, and technical details, of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions; and
- (b) Monitoring and reporting procedures to
 - (i) Ensure early detection of conditions that necessitate particular mitigation measures, and
 - (ii) Provide information on the progress and results of mitigation.

Throughout the Project, compliance with relevant national and international legislation will be monitored. The project operations will be monitored by Third Party Environmental and Social Monitoring Consultants and specialists.

The commencement of the monitoring activities for the construction phase is one (1) month following the mobilization on site. This comprehensive monitoring will be performed every three (3) months during the investment period, whereas the monitoring term of the operation phase will be every six (6) months.

The monitoring plans for the land preparation and construction phase and the operation phase are provided in Table 14 and Table 15.

The Client is responsible for preparing reports which will summarize the results of the monitoring activities together with the statistics, Key Performance Indicators, related records, grievance log, etc. and submit them to the Creditors. The frequency will be parallel to the monitoring periods during construction and operation phases, unless otherwise requested by the Creditors. That is, the Client is responsible for preparing those reports quarterly during construction phase and semiannually during operation phase. However, the notifications and/or reportings regarding the SEA/SH and GBV, and/or occupational accidents with death or serious injury will be made to the Creditors immediately without waiting the reporting period. In such cases, the report/notification will include the Root Cause Analyses (RCAs) and corrective-preventive actions taken or to be taken.

Table 14. Monitoring Plan for Land Preparation and Construction Phase

Issue	Which parameters shall be monitored?	Where the parameters shall be monitored?	How the parameters shall be monitored?	When/ How often the parameters shall be monitored?	Which national /international standards shall be complied with?	Responsibility	Cost
Physical Environment							
Vegetative Topsoil	Amount of stripped vegetative topsoil	Project area	Visual observation	Daily	Soil Conservation and Land Use Law (No.5400) IFC PS1 and PS6 AIIB ESF and ESS1	Contractor Client	No additional cost
Mixing of Distinct Soil Layers	Amount of stripped and excavated material	Project area	Visual observation	Daily	Soil Conservation and Land Use Law (No.5400) IFC PS1 and PS6 AIIB ESF and ESS1	Contractor Client	No additional cost
Handling of Excavation Waste	Amount of backfilled, temporarily stored, and disposed excavation materials	Project area	Visual observation	Once in a week as of land preparation and construction phase	Soil Conservation and Land Use Law (No.5400) Waste Management Regulation Regulation on Control of Excavation Soil, Construction and Demolition Wastes IFC PS1, PS3 and PS6 AIIB ESF and ESS1	Contractor Client	No additional cost
Erosion Potential	Presence of loose soil	Project area	Visual observation	Once in a week as of land preparation and construction phase	Soil Conservation and Land Use Law (No.5400) IFC PS1 and PS6 AIIB ESF and ESS1	Contractor Client	No additional cost
Soil Contamination	Number of oil/fuel and chemical leakages/spills Amount of contaminated soil	Project area	Visual observation	Daily	Soil Conservation and Land Use Law (No.5400) Waste Management Regulation	Contractor Client	No additional cost
	Number of oil/fuel and	Project area	Environmental	After each incident	IFC PS1, PS3, PS4 and	Contractor	Included in

Issue	Which parameters shall be monitored?	Where the parameters shall be monitored?	How the parameters shall be monitored?	When/ How often the parameters shall be monitored?	Which national /international standards shall be complied with?	Responsibility	Cost
	chemical leakages/spills Amount of contaminated soil		incident registry		PS6 AIIB ESF and ESS1	Client	construction cost
Water Resources	Surface water / groundwater quality analysis and measurements that include spill-related pollutants temperature, pH, dissolved oxygen, ammonium, nitrate, nitrite, TP, TDS; COD, BOD, TSS, TKN, turbidity, salinity, conductivity)	At the water resources	Sampling / analysis and in-situ measurements via an authorized environmental laboratory	In case of a major spill/leakage If spill/leakage reaches water resources	Water Pollution Control Regulation Regulation on the Monitoring of Surface Water and Groundwater IFC PS1 and PS3 AIIB ESF and ESS1	Contractor Client	Included in construction cost
				Upon grievance			
Air Quality	Settled dust, PM10 and PM2.5	Project area and its close vicinity	Sampling/analysis via an authorized environmental laboratory	Upon grievance	Regulation on Air Quality Assessment and Management IFC PS1 and PS3 AIIB ESF and ESS1	Contractor Client	Included in construction cost
			Visually, on the basis of irritation of the respiratory system	Daily as of land preparation and construction phase			No additional cost
	Maintenance records and exhaust decals of all machinery, equipment and vehicles	Administration office	Checking the records	Every six months			No additional cost
Noise	Noise levels	Project area and its close vicinity	At least 24-hr noise measurements via an authorized environmental	Upon grievance	Regulation on Environmental Noise Control IFC PS1 and PS3	Contractor Client	Included in construction cost

Issue	Which parameters shall be monitored?	Where the parameters shall be monitored?	How the parameters shall be monitored?	When/ How often the parameters shall be monitored?	Which national /international standards shall be complied with?	Responsibility	Cost
			laboratory		AIIB ESF and ESS1		
Waste	Amount and types of waste generated	Project area and its close vicinity	Visual observation Site inspections	Monthly as of land preparation and construction phase	Waste Management Regulation Zero Waste Regulation and other relevant waste regulations IFC PS1 and PS3 AIIB ESF and ESS1	Contractor Client	No additional cost
		Administration office	Waste Records	Every six months			
	Annual GHG emission contribution of the Project	Administration office	GHG emission estimation calculations	Annually			
Biological Environment							
Fauna	Number of incidents with fauna mortality	Project site and access road	Incident records	Monthly as of land preparation and construction phase	Law on the Conservation of Cultural and Natural Properties IFC PS1 and PS6 AIIB ESF and ESS1	Contractor Client	Included in construction cost
Fauna	Presence of fauna, specifically Common Tortoise (<i>Testudo graeca</i>) individuals	Project site	Visual observation	Translocation of individuals before and as of land preparation and construction phase		Contractor Client	No additional cost
Fauna	Target Bird Species and migratory species	Project site, access road, ETLs and their vicinity	Visual observation	During the spring and autumn migration periods & summer season		Contractor Client	No additional cost
Fauna	Breeding bird species	Project site	Visual observation	Before construction		Contractor Client	No additional cost
Flora	Rare Flora Species - <i>Cyclamen persicum</i>	Project site	Visual observation Collection of bulbs Relocation of bulbs Monitoring of relocation areas	Collection of bulbs: March to April before construction phase		Contractor Client	No additional cost
Socio-Economic Environment							
Recruitment	Number of the local employees	Administration office	Employment records Worker contracts	At the commencement of land preparation and	Labor Law (No. 4857) and ILO International	Contractor Client	No additional cost

Issue	Which parameters shall be monitored?	Where the parameters shall be monitored?	How the parameters shall be monitored?	When/ How often the parameters shall be monitored?	Which national /international standards shall be complied with?	Responsibility	Cost
				construction phase Quarterly during land preparation and construction phase	Regulations IFC PS2 AIIB ESF and ESS1		
Grievances	Number of grievances Number of open and closed grievances Average grievance response and closure time Identification of grievance channels Nature of grievances recorded, addressed and analyzed	Administration office	Grievance mechanism records	Monthly	Laws on Right to Information No. 4982 Law on the Protection of Personal Data IFC PS1 AIIB ESF and ESS1	Contractor Client	No additional cost
Income loss	Feedback on compensation, if available Concerns, questions, suggestion about livelihood restoration registered on GM, if any	Administration office	Grievance mechanism records Compensation documents (bank receipts, mutual agreements etc.)	Semiannual	Expropriation Law Pasture Law IFC PS5 AIIB ESF and ESS2	Contractor Client	Additional compensation cost, if any.
Working Conditions	Human Resource Policy Internal and external audits Record keeping practices	Project Area Administration office	Document check Onsite inspections	Monthly	Labor Law (No. 4857) and ILO International Regulations IFC PS2 AIIB ESF and ESS1	Contractor Client	No additional cost
Protecting the workforce	Age of workers Sample contracts Legal work permit	Administration office	Document check Onsite inspections	Before each recruitment Monthly	Labor Law (No. 4857) and ILO International Regulations IFC PS2	Contractor Client	No additional cost

Issue	Which parameters shall be monitored?	Where the parameters shall be monitored?	How the parameters shall be monitored?	When/ How often the parameters shall be monitored?	Which national /international standards shall be complied with?	Responsibility	Cost
					AIIB ESF and ESS1		
Occupational Health and Safety	Working conditions Accommodation conditions Disease Grievances Incidents	Project area	On-site inspections Interviews with employees Complaint records Training records Contract examples Internal and external audits Incident/Accident records Availability of an adequate OHS organizational structure Incident/accident reports Grievances Trainings and training materials OHS practices in the field (Use of PPE, etc.) HSE Inspection Legal Requirements Drill reports	Daily	Labor Law (No. 4857) and ILO International Regulations Law on Occupational Health and Safety IFC PS2 AIIB ESF and ESS1	Contractor Client	No additional costs
Community Health & Safety	Safety conditions Precautions taken for safety (warning signs, fencing, etc.) Grievances	Project area Residential areas in the vicinity	Grievance records Site Audits Training records	Daily Upon grievance	Environmental Law No. 2872 Law on Occupational Health and Safety Laws on Right to	Contractor Client	No additional costs

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Issue	Which parameters shall be monitored?	Where the parameters shall be monitored?	How the parameters shall be monitored?	When/ How often the parameters shall be monitored?	Which national /international standards shall be complied with?	Responsibility	Cost
					Information No. 4982 Law on the Protection of Personal Data IFC PS1 and PS4 AIIB ESF and ESS1		
Gender Based Violence (GBV), Sexual Exploitation Abuse / Sexual Harassment (SEA/SH)	GBV and SEA/SH related incidents and complaints	Administration office	Grievance records	Quarterly	Laws on Right to Information No. 4982 Law on the Protection of Personal Data IFC PS1 AIIB ESF and ESS1	Contractor Client	No additional cost
Traffic Risks	Number of grievances Number of incidents/accidents Training of workers/drivers	Administration office	Grievance records Incident/accident records Training records	Monthly	Highway Traffic Law No. 2918 IFC PS1 and PS4 AIIB ESF and ESS1	Contractor Client	No additional cost
Disclosure	Grievances	Settlements near the project area	On-site inspections Minutes of meetings Grievance records	Monthly	Laws on Right to Information No. 4982 Law on the Protection of Personal Data IFC PS1 AIIB ESF and ESS1	Contractor Client	No additional cost
Chance finds	Number of chance find	At and around the project area	Visual observation	Daily	Law on the Conservation of Cultural and Natural Properties IFC PS1 and PS8 AIIB ESF and ESS1	Contractor Client	No additional cost

Table 15. Monitoring Plan for Operation Phase

Issue	Which parameters shall be monitored?	Where the parameters shall be monitored?	How the parameters shall be monitored?	When/ How often the parameters shall be monitored?	Which national / international standards shall be complied with?	Responsibility	Cost
Physical Environment							
Soil Contamination	Number of oil/fuel and chemical leakages/spills Amount of contaminated soil	Project area	Visual observation	Monthly	Soil Conservation and Land Use Law (No.5400) Waste Management Regulation	Client	No additional cost
	Number of oil/fuel and chemical leakages/spills Amount of contaminated soil	Project area	Environmental incident registry	After each incident	IFC PS1, PS3, PS4 and PS6 AIIB ESF and ESS1	Client	Included in operation cost
Water Resources	Surface water / groundwater quality analysis and measurements that include spill-related pollutants	At the water resources	Sampling / analysis and in-situ measurements via an authorized environmental laboratory	Upon grievance	Water Pollution Control Regulation Regulation on the Monitoring of Surface Water and Groundwater IFC PS1 and PS3 AIIB ESF and ESS1	Client	Included in operation cost
Air Quality	Maintenance records and exhaust decals of all machinery, equipment and vehicles	Administration office	Checking the records	Every six months	Regulation on Air Quality Assessment and Management IFC PS1 and PS3 AIIB ESF and ESS1	Client	No additional cost
Noise	Noise levels	Project area and its close vicinity	At least 24-hr noise measurements via an authorized environmental laboratory	Upon grievance	Regulation on Environmental Noise Control IFC PS1 and PS3 AIIB ESF and ESS1	Client	Included in operation cost
Waste	Amount and types of waste generated	Project area and its close vicinity	Visual observation Site inspections	Monthly	Waste Management	Client	No additional cost

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Issue	Which parameters shall be monitored?	Where the parameters shall be monitored?	How the parameters shall be monitored?	When/ How often the parameters shall be monitored?	Which national / international standards shall be complied with?	Responsibility	Cost
		Administration office	Records	Every six months	Regulation		
	Annual GHG emission contribution of the Project	Administration office	GHG emission estimation calculations	Annually	Zero Waste Regulation and other relevant waste regulations IFC PS1 and PS3 AIIB ESF and ESS1		
Biological Environment							
Fauna	Breeding bird species	Project site	Visual observation	1 year between July-August for 5 days	Law on the Conservation of Cultural and Natural Properties IFC PS1 and PS6 AIIB ESF and ESS1	Client	Included in operation cost
Flora	Rare Flora Species - <i>Cyclamen persicum</i> specie	Project site	Visual observation Determination of population status of the translocated area Monitoring of relocation areas	Once a year (at least 3 years)		Client	No additional cost
Socio-Economic Environment							
Grievances	Number of grievances Number of open and closed grievances Average grievance response and closure time Identification of grievance channels Nature of grievances recorded, addressed and analyzed	Administration office	Grievance mechanism records	Monthly	Laws on Right to Information No. 4982 Law on the Protection of Personal Data IFC PS1 AIIB ESF and ESS1	Client	No additional cost
Income loss	Feedback on compensation, if available Concerns, questions, suggestion about	Administration office	Grievance mechanism records Compensation documents (bank	Annual	Expropriation Law Pasture Law IFC PS5	Contractor Client	Additional compensation cost, if any.



Issue	Which parameters shall be monitored?	Where the parameters shall be monitored?	How the parameters shall be monitored?	When/ How often the parameters shall be monitored?	Which national / international standards shall be complied with?	Responsibility	Cost
	livelihood restoration registered on GM, if any		receipts, mutual agreements etc.)		AIIB ESF and ESS2		
Working Conditions	Human Resource Policy Internal and external audits Record keeping practices	Project Area Administration office	Document check Onsite inspections	Monthly	Labor Law (No. 4857) and ILO International Regulations IFC PS2	Client	No additional cost
Protecting the workforce	Age of workers Sample contracts Legal work permit	Administration office	Document check Onsite inspections	Monthly	AIIB ESF and ESS1	Client	No additional cost
Occupational Health and Safety	Working conditions Disease Grievances Incidents	Project area	On-site inspections Interviews with employees Complaint records Training records Contract examples Internal and external audits Incident/Accident records Availability of an adequate OHS organizational structure. Incident/accident reports Grievances Trainings and training materials OHS practices in the field (Use of	Daily	Labor Law (No. 4857) and ILO International Regulations Law on Occupational Health and Safety IFC PS2 AIIB ESF and ESS1	Client	No additional cost

Issue	Which parameters shall be monitored?	Where the parameters shall be monitored?	How the parameters shall be monitored?	When/ How often the parameters shall be monitored?	Which national / international standards shall be complied with?	Responsibility	Cost
			PPE, etc.) HSE Inspection Legal Requirements Drill reports				
Community Health & Safety	Safety conditions Precautions taken for safety (warning signs, fencing, etc.) Grievances	Project area Residential areas in the vicinity	Grievance records Site Audits Training records	Daily Upon grievance	Environmental Law No. 2872 Law on Occupational Health and Safety Laws on Right to Information No. 4982 Law on the Protection of Personal Data IFC PS1 and PS4 AIIB ESF and ESS1	Client	No additional costs
Gender Based Violence (GBV), Sexual Exploitation Abuse / Sexual Harassment (SEA/SH)	GBV and SEA/SH related incidents and complaints	Administration office	Grievance records	Quarterly	Laws on Right to Information No. 4982 Law on the Protection of Personal Data IFC PS1 AIIB ESF and ESS1	Client	No additional cost
Chance finds	Number of chance find	At and around the project area	Visual observation	Daily	Law on the Conservation of Cultural and Natural Properties IFC PS1 and PS8 AIIB ESF and ESS1	Contractor Client	No additional cost

7 ESMP IMPLEMENTATION AND COST ESTIMATES

The mitigation and monitoring activities/actions which have been included in the Section 4.13 (Environmental and Social Management Plan) and Chapter 6 (MONITORING AND REPORTING) will be implemented throughout the construction and operation phases of the Project.

The EPC contracts with the main contractors and suppliers have been signed and site mobilizations have been completed in the current situation. The Zoning Plan was publicly disclosed as of 31.01.2024 for one month in accordance with the national legislation. After the completion of this disclosure and if there are no objections, the necessary permit will be approved. Thus, construction activities are expected to start within the first quarter of 2024. The ESMP implementation will be parallel to the Project implementation schedule which has been given in Section 2.7 of the Project ESIA report.

All costs are included in the Project budget/operation budget as it has been presented in Table 7, Table 8, Table 14 and Table 15. Simplified versions of the mitigation measures and/or monitoring activities; their estimated costs; whose budget will cover those costs; and related E&S aspects/impacts have been given in the following tables separately for construction and operation phases (see Table 16 and Table 17).

Table 16. Estimated Costs during Land Preparation and Construction Phase

Estimated Costs for the Implementation of ESMP during Land Preparation and Construction Phase			
Measures/Activities	Estimated Cost*	Related E&S Aspects/Impacts	Budget
Mitigation Measures			
Designated site for construction with visible markings.	₺10.000,00	Land Use, Soil, Geology and Natural Hazards	İÇTAŞ**
Grading per natural slope, drainage construction.	₺13.500.000,00	Land Use, Soil, Geology and Natural Hazards	İÇTAŞ
Temporary storage of hazardous materials in designated areas.	₺400.000,00	Land Use, Soil, Geology and Natural Hazards Prevention against the Contamination of Soil, Surface Water and Groundwater	İÇTAŞ
Use of secondary containment and spill kits.	₺10.000,00	Land Use, Soil, Geology and Natural Hazards Prevention against the Contamination of Soil, Surface Water and Groundwater Water Resources, Water Quality and Wastewater	İÇTAŞ
Periodic control of septic tank integrity.	₺100.000,00	Land Use, Soil, Geology and Natural Hazards Water Resources, Water Quality and Wastewater	İÇTAŞ
Earthquake-resistant design and construction for all project structures.	₺250.000,00	Land Use, Soil, Geology and Natural Hazards	Electrical Equipments and EBOP budget and switchyard / transmission line budget
Collection of domestic wastewaters in leak-proof septic tanks, periodic vacuuming, and disposal in accordance with regulations.	₺280.000,00	Water Resources, Water Quality and Wastewater	İÇTAŞ

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Estimated Costs for the Implementation of ESMP during Land Preparation and Construction Phase			
Measures/Activities	Estimated Cost*	Related E&S Aspects/Impacts	Budget
Dust impact mitigation through watering construction sites and access roads.	₺1.500.000,00	Air Quality and GHG Emissions	İÇTAŞ
Provide employees with protective equipment as per OHS Law.	₺150.000,00	Noise Levels Labor and Working Conditions	İÇTAŞ
Segregate and temporarily store wastes in designated areas.	₺14.000,00	Waste and Resource Management	İÇTAŞ
Construct temporary waste storage areas per Waste Management Regulation.	₺400.000,00	Waste and Resource Management	İÇTAŞ
Separate storage for hazardous and non-hazardous wastes.	₺14.000,00	Waste and Resource Management	İÇTAŞ
Label and store waste based on classification.	₺10.000,00	Waste and Resource Management	İÇTAŞ
Keep absorbents and firefighting equipment ready for emergency response.	₺57.000,00	Waste and Resource Management	İÇTAŞ
Ensure timely waste transportation to prevent storage capacity exceedance.	₺40.000,00	Waste and Resource Management	İÇTAŞ
Hatay Regional Council experts will secure the site with flags, no-entry signs, etc., limiting vehicle traffic and preventing disturbance.	₺10.000,00	Cultural Heritage	İÇTAŞ
Minimize sensory impact on wildlife, periodically measure noise and emissions.	₺20.000,00	Biological Environment	İÇTAŞ
Implement on-site speed limits, use dust suppression measures.	₺1.500.000,00	Biological Environment	İÇTAŞ
Implement warning signs and speed limits, relocate herpetofauna species.	₺10.000,00	Biological Environment	İÇTAŞ
Take measures to prevent the spread of invasive species.	₺32.500,00	Biological Environment	İÇTAŞ
Equip work areas with warning signs based on the nature and risks of the work.	₺10.000,00	Labor and Working Conditions	İÇTAŞ
Implement fire prevention measures in the project area.	₺57.000,00	Labor and Working Conditions	İÇTAŞ
Establish an infirmary on-site and provide emergency health referrals.	₺281.000,00	Labor and Working Conditions	İÇTAŞ
Train drivers and operators on traffic rules and the Traffic Management Plan.	₺50.000,00	Labor and Working Conditions Community Health and Safety	İÇTAŞ
Install required traffic signs at the project site and surroundings.	₺140.000,00	Labor and Working Conditions Community Health and Safety	İÇTAŞ
Fence the project site and employ security personnel.	₺7.525.000,00	Labor and Working Conditions Community Health and Safety	SOFT EPC and İÇTAŞ budget
Establish an OHS organizational structure as per local legislation.	₺937.500,00	Labor and Working Conditions	İÇTAŞ
Implement TMP to minimize traffic-related impacts on workers and nearby settlements, with personnel training.	₺50.000,00	Community Health and Safety	İÇTAŞ
Post traffic signs in accordance with the Regulation on Traffic Signs.	₺175.000,00	Community Health and Safety	İÇTAŞ

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Estimated Costs for the Implementation of ESMP during Land Preparation and Construction Phase			
Measures/Activities	Estimated Cost*	Related E&S Aspects/Impacts	Budget
Provide project personnel with training in safe driving.	₺50.000,00	Community Health and Safety	İÇTAŞ
Employ security personnel for regular monitoring of the facility and surroundings.	₺4.200.000,00	Community Health and Safety	İÇTAŞ
Measures for livelihood restoration and compensation in case of unexpected impacts.	Cannot be estimated	Land Acquisition and Livelihood Restoration	İÇTAŞ
Other mitigation measures which are given in Table 7 in detail have no additional cost to implement. Therefore, they are not included in this Cost Estimation Table.	No Additional Cost	All Identified ESHS Impacts and Aspects	İÇTAŞ
Monitoring Activities			
Surface water / groundwater quality analysis and measurements that include spill-related pollutants; temperature, pH, dissolved oxygen, ammonium, nitrate, nitrite, TP, TDS; COD, BOD, TSS, TKN, turbidity, salinity, conductivity)	₺60.000,00	Water Resources, Water Quality and Wastewater	İÇTAŞ
GHG emission estimation calculations	₺100.000,00	Air Quality and GHG Emissions	İÇTAŞ
Settled dust, PM10 and PM2.5	₺40.000,00	Air Quality and GHG Emissions	İÇTAŞ
At least 24-hr noise measurements via an authorized environmental laboratory	₺25.000,00	Noise Levels	İÇTAŞ
Number of incidents with fauna mortality	₺100.000,00	Biological Environment	İÇTAŞ
Presence of fauna, specifically Common Tortoise (<i>Testudo graeca</i>) individuals			İÇTAŞ
Target Bird Species and migratory species			İÇTAŞ
Breeding bird species			İÇTAŞ
Rare Flora Species – <i>Cyclamen persicum</i>			₺110.000,00
Other monitoring activities such as visual observation, record keeping, etc. Which are given in Table 14 in detail have no additional cost to implement. Therefore, they are not included in this Cost Estimation Table.	No Additional Cost	All Identified ESHS Impacts and Aspects	İÇTAŞ
Capacity Building			
Capacity development and training	No Additional Cost	The already employed personnel will be assigned to manage and implement the ESMP. Therefore, there is no additional cost for the capacity development and training.	İÇTAŞ
Stakeholder Engagement			
Public consultation meeting	₺20.000,00	Stakeholder Engagement and	İÇTAŞ



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Estimated Costs for the Implementation of ESMP during Land Preparation and Construction Phase			
Measures/Activities	Estimated Cost*	Related E&S Aspects/Impacts	Budget
		Information Disclosure	
Information disclosure channels	₺30.000,00	Stakeholder Engagement and Information Disclosure	İÇTAŞ

* It should be noted that those cost estimations have been studied for 2024 prices where 1 Dollar is accepted to be equal to 30.10 Turkish Liras (1 \$ = 30.10 ₺).

** İÇTAŞ refers to İÇTAŞ's Engineering, Consultancy and General Management Expenses budget.

Table 17. Estimated Costs during Operation Phase

Estimated Costs for the Implementation of ESMP during Operation Phase			
Measures/Activities	Estimated Cost*	Related E&S Aspects/Impacts	Budget
Mitigation Measures			
Use of secondary containment and spill kits, and EPRP for hazardous materials.	₺10.000,00	Land Use, Soil, Geology and Natural Hazards Prevention against the Contamination of Soil, Surface Water and Groundwater Water Resources, Water Quality and Wastewater	İÇTAŞ**
Periodically check the integrity of the septic tank.	₺0,00	Land Use, Soil, Geology and Natural Hazards Water Resources, Water Quality and Wastewater	İÇTAŞ
Collection of domestic wastewaters in leak-proof septic tanks, periodic vacuuming, and disposal in accordance with regulations.	₺120.000,00	Water Resources, Water Quality and Wastewater	İÇTAŞ
Provide employees with protective equipment as per OHS Law.	₺150.000,00	Noise Levels Labor and Working Conditions	İÇTAŞ
Regularly maintain plant components, transformers, inverters, and transportation vehicles to ensure good working conditions.	₺3.612.000,00	Noise Levels	İÇTAŞ
Obtain Hazardous Materials and Hazardous Waste Compulsory Liability Insurance for the temporary storage area.	₺1.000,00	Waste and Resource Management	İÇTAŞ
Ensure timely waste transportation to prevent storage capacity exceedance.	₺80.000,00	Waste and Resource Management	İÇTAŞ
Hatay Regional Council experts will secure the site with flags, no-entry signs, etc., limiting vehicle traffic and preventing disturbance.	₺10.000,00	Cultural Heritage	İÇTAŞ
Surround the area with a fence to prevent species from entering.	No Additional Cost	Biological Environment Community Health and Safety	İÇTAŞ
Remove and translocate Common Tortoise (<i>Testudo graeca</i>) if detected.	No Additional Cost	Biological Environment	İÇTAŞ
Avoid disturbing/damaging nests of bird species.	No Additional Cost	Biological Environment	İÇTAŞ
Minimize project site lighting, use sensory lighting systems, and aim lights downwards.	No Additional Cost	Biological Environment	İÇTAŞ
Conduct ecological monitoring	₺200.000,00	Biological Environment	İÇTAŞ



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Estimated Costs for the Implementation of ESMP during Operation Phase			
Measures/Activities	Estimated Cost*	Related E&S Aspects/Impacts	Budget
studies for one year and submit reports to the General Directorate of Nature Conservation and National Parks.			
Consider single-level powerline cable arrangements, equip towers with bird diverters/deterrents, and ensure visibility at night.	No Additional Cost	Biological Environment	İÇTAŞ
Take measures to prevent the spread of invasive species.	₺50.000,00	Biological Environment	İÇTAŞ
Equip work areas with warning signs based on the nature and risks of the work.	₺10.000,00	Labor and Working Conditions	İÇTAŞ
Implement fire prevention measures in the project area.	₺30.000,00	Labor and Working Conditions	İÇTAŞ
Establish an infirmary on-site and ensure emergency medical referrals.	₺50.000,00	Labor and Working Conditions	İÇTAŞ
Train drivers, implement a Traffic Management Plan, and use required traffic signs.	₺50.000,00	Labor and Working Conditions Community Health and Safety	İÇTAŞ
Install required traffic signs at the project site and surroundings.	₺20.000,00	Labor and Working Conditions Community Health and Safety	İÇTAŞ
Establish an OHS organizational structure and conduct daily inspections.	₺100.000,00	Labor and Working Conditions	İÇTAŞ
Implement TMP to minimize traffic-related impacts on workers and nearby settlements, with personnel training.	₺75.000,00	Community Health and Safety	İÇTAŞ
Post traffic signs in accordance with the Regulation on Traffic Signs.	₺20.000,00	Community Health and Safety	İÇTAŞ
Provide project personnel with training in safe driving.	₺75.000,00	Community Health and Safety	İÇTAŞ
Employ security personnel for regular monitoring of the facility and surroundings.	₺7.013.300,00	Community Health and Safety	İÇTAŞ
Measures for livelihood restoration and compensation in case of unexpected impacts.	Cannot be estimated	Land Acquisition and Livelihood Restoration	İÇTAŞ
Other mitigation measures which are given in Table 8 in detail have no additional cost to implement. Therefore, they are not included in this Cost Estimation Table.	No Additional Cost	All Identified ESHS Impacts and Aspects	İÇTAŞ
Monitoring Activities			
Surface water / groundwater quality analysis and measurements that include spill-related pollutants.	₺60.000,00	Water Resources, Water Quality and Wastewater	İÇTAŞ
GHG emission estimation calculations	₺150.000,00	Air Quality and GHG Emissions	İÇTAŞ
Settled dust, PM10 and PM2.5	₺40.000,00	Air Quality and GHG Emissions	İÇTAŞ
At least 24-hr noise measurements via an authorized environmental laboratory	₺25.000,00	Noise Levels	İÇTAŞ



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Estimated Costs for the Implementation of ESMP during Operation Phase			
Measures/Activities	Estimated Cost*	Related E&S Aspects/Impacts	Budget
Determination of population status of the translocated area	₺200.000,00	Biological Environment	İÇTAŞ
Monitoring of relocation areas			İÇTAŞ
Annual Ecological Monitoring Studies			İÇTAŞ
Breeding bird species			İÇTAŞ
Rare Flora Species - <i>Cyclamen persicum</i>	₺165.000,00		İÇTAŞ
Other monitoring activities such as visual observation, record keeping, etc. which are given in Table 15 in detail have no additional cost to implement. Therefore, they are not included in this Cost Estimation Table.	No Additional Cost	All Identified ESHS Impacts and Aspects	İÇTAŞ
Capacity Building			
Capacity development and training	No Additional Cost	The already employed personnel will be assigned to manage and implement the ESMP. Therefore, there is no additional cost for the capacity development and training.	İÇTAŞ
Stakeholder Engagement			
Public consultation meeting	₺30.000,00	Stakeholder Engagement and Information Disclosure	İÇTAŞ
Information disclosure channels	₺30.000,00	Stakeholder Engagement and Information Disclosure	İÇTAŞ

* It should be noted that those cost estimations have been studied for 2024 prices where 1 Dollar is accepted to be equal to 30.10 Turkish Liras (1 \$ = 30.10 ₺).

** İÇTAŞ refers to İÇTAŞ's OPEX budget.

8 REVIEW AND UPDATE

This Plan is a living document, and the responsibilities, procedures and compliance actions shall be updated as required; for instance, in case of a change in the applicable legislative requirements and standards. In general, the expected review and update frequency is determined as at least once in a year. However, it should be noted that in case of an additional requirement without waiting for the predetermined frequency, EHS Team and Social Team shall review and if necessary, as per the evaluation, update the Plan right after the emergency situation.

It is the responsibility of the EHS Team and Social Team and sub-contractors' EHS and Social related personnel to be fully aware of its contents, to provide relevant training to staff and to ensure that procedures are being implemented to achieve compliance with this Plan.



	Datum: ED-50		Datum: WGS-84	
	UTM		Geographic	
	D.O.M.: 39		D.O.M.: -	
	Zone: 37 – 6 degree		Zone: -	
	X	Y	Latitude	Longitude
SPP Area	242919,479	4096491,859	36,977817	36,111710
	242894,378	4095417,970	36,968142	36,111794
	242617,167	4095396,618	36,967874	36,108691
	242494,088	4095176,873	36,965862	36,107385
	242172,065	4095168,226	36,965696	36,103775
	241984,147	4095178,944	36,965741	36,101663
	241259,213	4095245,144	36,966138	36,093507
	241245,447	4096405,317	36,976579	36,092955
Alternative Road-1	240839,584	4096684,638	36,978982	36,088305
	240847,907	4096678,293	36,978927	36,088401
	241003,669	4096617,882	36,978426	36,090169
	241023,337	4096605,661	36,978321	36,090394
	241244,697	4096402,753	36,976555	36,092948
	241244,876	4096387,660	36,976420	36,092955
	241014,558	4096598,780	36,978257	36,090298
	241001,388	4096606,963	36,978327	36,090148
	240839,847	4096669,615	36,978846	36,088313
	240832,916	4096670,507	36,978853	36,088235
SPP Path	242396,627	4096459,838	36,977385	36,105854
	242304,473	4096346,037	36,976336	36,104859
	241704,192	4095481,002	36,968383	36,098419
	241681,719	4095211,588	36,965952	36,098259
	241661,978	4095213,390	36,965962	36,098037
	241684,212	4095479,934	36,968368	36,098195
	242284,493	4096344,970	36,976321	36,104635
	242376,646	4096458,770	36,977370	36,105630
Social Facility Area (680.57 m ²)	242806,727	4096479,032	36,977670	36,110449
	242838,814	4096478,020	36,977670	36,110810
	242838,147	4096456,832	36,977479	36,110810
	242806,059	4096457,843	36,977479	36,110449
Power Plant Area (1541.53 m ²)	242843,141	4096480,611	36,977695	36,110858
	242910,957	4096478,474	36,977694	36,111619
	242910,241	4096455,765	36,977489	36,111619
	242842,425	4096457,903	36,977490	36,110857
Switchyard (11605.96 m ²)	242807,184	4096455,077	36,977455	36,110463
	242910,417	4096451,823	36,977454	36,111622
	242906,877	4096339,510	36,976442	36,111621
	242803,643	4096342,764	36,976443	36,110461
Alternative Road-2	241244,563	4096388,932	36,976431	36,092951
	241245,364	4096375,283	36,976308	36,092965
	240618,929	4095981,219	36,972588	36,086071
	240621,657	4095993,520	36,972700	36,086097
Alternative Road-3	240616,013	4095983,176	36,972605	36,086038
	241253,398	4095735,156	36,970548	36,093274
	241253,538	4095723,298	36,970441	36,093280
	240612,024	4095972,924	36,972512	36,085996



**T.C. ENERJİ PİYASASI
DÜZENLEME KURUMU**

ÖNLİSANS

ÖRNEK
T.C.
Ankara 33. Noterliği
Ziya Gökalp Cad.No:16/6
Kızılay-ANKARA Tel:435 84 0

077 22

Bu önlisans kapsamındaki üretim tesisi
Yenilenebilir Enerji Kaynağı kullanmaktadır.
(5346 Sayılı Kanunda yer alan, "Bu Kanun kapsamındaki yenilenebilir enerji
kaynakları" tanımı çerçevesinde olan üretim tesisleri için)

Lisans No : ÖN/11934-10/05686

Tarih : 06/07/2023

Bu lisans, IC İçtaş Güneş Enerji Üretim ve Ticaret Anonim Şirketi'ne, Hatay ili, Erzin ilçesinde kurulması planlanan G4- Erzin-2 GES üretim tesisinin yatırıma başlanabilmesi için gerekli onay, izin, ruhsat ve benzerlerinin alınabilmesi amacıyla 06/07/2023 tarihinden itibaren 11 ay 25 gün süreyle 6446 sayılı Elektrik Piyasası Kanunu ve ilgili mevzuat uyarınca Enerji Piyasası Düzenleme Kurulu'nun 06/07/2023 tarihli ve 11934-10 sayılı Kararı ile verilmiştir. (Bu önlisans, IC İçtaş Enerji Yatırım Holding A.Ş.'ye verilen 01/09/2022 tarihli ve ÖN/11159-19/05221 numaralı önlisansı sonlandırılarak eskisinin devamı mahiyetinde verilmiştir.)

**İşbu suret aslına
uygundur.**

08 Ağustos 2023

ANKARA 33. NOTERİ
ZELİHA BALI
Yerine İmza Yetkili Katip
AYDIN ÜZÜNDERE



Mustafa YILMAZ
Başkan

ÖZEL HÜKÜMLER

Bu önlisans IC İçtaş Güneş Enerji Üretim ve Ticaret Anonim Şirketi'ne aşağıda bilgileri verilen üretim tesisi projesi için verilmiştir.

1- Üretim tesisi projesine ilişkin bilgiler

Proje Adı : G4- Erzin-2 GES
İli : Hatay
İlçesi : Erzin
Tesis tipi : Güneş
Tesis toplam kurulu gücü : 140 MWm/100 MWe
Yıllık elektrik enerjisi üretim miktarı : 200.000.000 kWh
Sisteme bağlantı noktası ve gerilim seviyesi : 154 kV EİH ile İvizler-Osmaniye OSB EİH'ya girdi-çıktı

ÖRNEK
T.C.
Ankara 33. Noterliği
Ziya Gökalp Cad.No:16/6
Kızılay-ANKARA Tel:435 84 0

077 221

2- Bildirim adresi: Kocatepe Mah. Kızılırmak Cad. No: 31-33 İç Kapı No:20 Çankaya/ANKARA

3- Önlisansın yürürlüğe girmesi ve süresi

Bu önlisans, 06/07/2023 tarihinde yürürlüğe girer ve önlisans sahibinin bu önlisans kapsamındaki hak ve yükümlülükleri, ön lisansın yürürlük tarihinden itibaren geçerlilik kazanır. Bu ön lisans, yürürlük tarihinden itibaren 11 (onbir) ay 25 (yirmibeş) gün için geçerlidir.

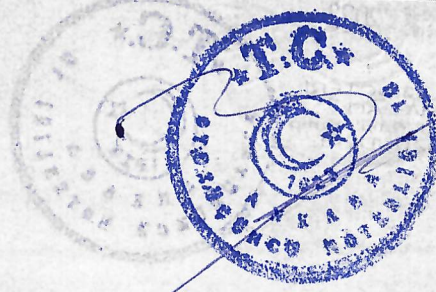
4- Tesis yerine ait koordinat bilgileri

Santral Sahası Köşe Koordinatları:

Nokta No	E	N
K1	241259,213	4095245,144
K2	241245,447	4096405,317
K3	242919,479	4096491,859
K4	242894,378	4095417,970
K5	242617,167	4095396,618
K6	242494,088	4095176,873
K7	242172,065	4095168,226
K8	241984,147	4095178,944

5- Önlisansla yapılan tadiller

Sıra No	Tadilin	
	Kapsamı	Tarihi ve Sayısı
1		



Sayı : E-94038218-804.99-72551
Konu : G4-ERZİN 2 GES (140 MWm/100
MWe/140 MWe/140 MWP/199,9552 ha)
PROJESİ SU TEMİNİ HK.

23.12.2022

Sayın ÇINAR MÜHENDİSLİK MÜŞAVİRLİK A.Ş
Bağlıca Mahallesi Çambayırı Caddesi Çınar Plaza No:66/6
etimesgut/ankara

İlgi : 12.12.2022 tarihli ve 1359 sayılı yazımız

Hatay İli, Erzin İlçesi, Hürriyet Mahallesi sınırları içerisinde yer alan 639 ada 1 parsel Mevkii'nde IC İctaş Enerji Yatırım Holding A.Ş. tarafından "G4 Erzin 1 GES (140 MVm /100 MWe/140 MWP/199,9552 ha) Projesi" planlanmaktadır. İnşaat aşamasında oluşacak 18m³/gün işletme aşaması için ise oluşacak 8m³/gün ihtiyaç duyulan kullanma suyunun idaremiz sorumluluğundaki tankerler ile ücreti mukabilinde verilmesi talep edilmektedir.

Bahse konu bölgede ihtiyaç duyulan içme ve kullanma suyu bedelinin HATSU Tarifeler Yönetmeliğine göre yapılacak hesaplamalar mukabilinde ödenmesi halinde uygun görülmektedir.

Bilgilerinize sunulur.

İlker AKYEL
İçmesuyu Dairesi Başkan V.

Bu belge, güvenli elektronik imza ile imzalanmıştır.

Doğrulama Kodu: iUUFoO-mM6/Qx-Rrq9Cs-z4bEgM-oA3vysta Doğrulama Linki: <https://www.turkiye.gov.tr/icisleri-belediye-ebys>



Sayı : E-19420631-804.99-69377
Konu : G4-erzin 2 Ges (1401 Mwm/100 Mwe/140
Mwp /199,9552 Ha) Projesi Su ve Atıksu
Kullanımı Hk.

05.12.2022

Sayın ÇINAR MÜHENDİSLİK MÜŞAVİRLİK A. Ş.
Bağlıca Mahallesi Çambayırı Caddesi Çınar Plaza No:66/5 Etimesgut/ANKARA

İlgi : 25.11.2022 tarihli ve 1310 sayılı yazınız.

Gülhan OZAN
Mühendisi

Hatay İli, Erzin İlçesi, Hürriyet Mahallesi sınırları içerisinde yer alan 639 ada /1 parsel Mevkii'nde "G4 - Erzin -2 GES (140 MWm/100 MWe/140 MWp/199,9552 ha) Projesi" planlanmaktadır. İnşaat aşamasında oluşacak 16 M3 /gün işletme aşaması için ise oluşacak 4 M3 /gün atıksuyun tesis içerisinde sızdırmaz fosseptikte depolandıktan sonra vidanjör ile çektilmesina ilişkin kurum görüşü talep edilmektedir.

İlgi yazıda belirtilen projenin bulunduğu bölgede kanalizasyon hatları mevcut olmayıp, evsel atıksuları sızdırmaz tipte fosseptikte depolanması gerekmektedir. Fosseptiğin dolması durumunda Hatsu Tarifeler Yönetmeliğine göre vidanjör hizmeti verilerek fosseptiğin çekimi yapılacaktır.

Bilgilerinize rica ederim.

Semir Seyhan MİÇOOĞULLARI
Kanalizasyon Daire Başkanı

Bu belge, güvenli elektronik imza ile imzalanmıştır.

Doğrulama Kodu: aHhkO/-pi8fx1-yU4KNX-EYkqui-fkuQ+FA/ Doğrulama Linki: <https://www.turkiye.gov.tr/icisleri-belediye-ebys>

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Kep Adresi: hatsu@hs01.kep.tr

Bilgi için: Gülhan OZAN
Mühendis
Telefon No:

