REPUBLIC OF TURKIYE

ISTANBUL GOVERNORSHIP

ISTANBUL PROJECT COORDINATION UNIT (IPCU)



ISTANBUL SEISMIC RISK MITIGATION AND EMERGENCY PREPAREDNESS PROJECT (ISMEP)

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

Istanbul 2025

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GLOSSARY

AFAD	Disaster and Emergency Management Directorate
AKOM	Disaster Coordination Center of the Greater Municipality of Istanbul
AMP	Asbestos Management Plan
ASK	Civic Coordination Against Disasters
CBD	Convention on Biological Diversity
C-ESMP	Contractor Environmental and Social Management Plan
СН	Cultural Heritage
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
E&S	Environmental and Social
EHSG	Environmental, Health and Safety Guidelines
EIA	Environmental Impact Assessment
ERP	Emergency Response Plan
ESDD	Environmental and Social Due Diligence
ESEL	Environmental and Social Exclusion List
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESP	Environmental and Social Policy
ESS	Environmental and Social Standard
EU	European Union
FI	Financial Intermediary
GM	Grievance Mechanism
GRM	Grievance Redress Mechanism
ICOM	International Council of Museums
ICOMOS	International Council on Monuments and Sites
IPCU	Istanbul Project Coordination Unit
ISKI	Istanbul Water and Sewerage Administration
ISMEP	Istanbul Seismic Risk Mitigation and Emergency Preparedness
KfW	Kreditanstalt für Wiederaufbau (German Development Bank)
KUDEB	Preservation, Implementation and Control Office
LMP	Labor Management Procedures
MoCT	Ministry of Culture and Tourism
MoEUCC	Ministry of Environment, Urbanization and Climate Change
OHS	Occupational Health and Safety
PPE	Personal Protective Equipment
PPM	Project-Affected Peoples€™s Mechanism
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SEP	Stakeholder Engagement Plan
ТАЕК	Turkish Atomic Energy Commission
TAÇ	Turkish Association for Conservation of Cultural Heritage
UNESCO	United Nations Educational, Scientific and Cultural Organization
WB	World Bank

1.0 INTRODUCTION

This report presents the findings and recommendations for the "Istanbul Seismic Risk Mitigation and Emergency Preparedness (ISMEP)" project. It covers the analysis of the Project's Environmental and Social Management Plan (ESMP), which supports environmentally and socially sustainable infrastructure and development.

From an organizational perspective, the role of institutions in society encompasses not only economic aspects but also environmental and social dimensions. To ensure robust sustainability implementation, economic, social, and environmental parameters — the fundamental pillars of sustainability — must be integrated into all strategic and operational processes and decision-making mechanisms within an organization.

In line with this understanding, the following issues were addressed:

- > Identifying and assessing potential environmental and social impacts;
- > Discussing mitigation and preventive measures where and when applicable;
- Proposing mitigation and monitoring plans;
- Ensuring compliance with national and international commitments related to environmental, social, and legal frameworks, including the Paris Agreement and KfW's Environmental and Social Policy (which encompasses the Environmental and Social Standards (ESSs), the Exclusion List, and the Policy on Project-Affected People's Mechanism (PPM));

The analysis was carried out through:

- > A comprehensive review of project-related reports;
- > Consultations with key stakeholders at multiple levels, including:
 - o Istanbul Governorate
 - Project Coordination Unit and KfW representatives
 - Istanbul Provincial Directorate of Disaster and Emergency Management (AFAD)
 - o Central government agencies such as the Ministry of Environment,
 - o Urbanization and Climate Change; Ministry of Culture and Tourism; and
 - Ministry of Agriculture and Forestry
 - Provincial Directorates of the Ministries of Health, Education, and Trade
 - o Istanbul Metropolitan Municipality and affiliated district municipalities
 - Istanbul Water and Sewerage Administration (ISKI)
 - AKOM Disaster Coordination Center of Istanbul Metropolitan Municipality
 - Regional Preservation Councils for Cultural and Natural Assets (No. 1, No. 2, and No. 3)
 - Directorate of National Palaces Under the Turkish Grand National Assembly (TBMM)Regional Council for the Conservation of Cultural Heritage
 - Regional Council for the Conservation of Cultural Heritage
 - o Boğaziçi University Kandilli Observatory and Earthquake Research Institute
 - o Academia

2.0 BACKGROUND

Türkiye is one of the most seismically active regions in the world. Two thirds of the country are located on active fault zones where 70% of the population live. Average annual number of earthquakes equal or greater than a magnitude of 5.5 on the Richter scale is 0.76. With this frequency, Türkiye rates 6th

in the World. Average number of people died annually due to earthquakes reached 950 and corresponding direct economic costs reached 1 billion US \$ annually, in the last two decades.

In the most recent earthquakes of Izmit and Düzce in August and November 1999, 18,000 lives were lost, 600,000 people were forced to leave their homes and direct costs reached 10-15 billion US\$. More recently, Türkiye is experiencing a major policy shift from traditional emergency response and ex-post recovery activities to proactive hazard risk management. This requires concerted efforts for emergency preparedness, risk identification, assessment and mitigation.

istanbul, the largest metropolitan area in Türkiye with a population of over 16 million inhabitants, is situated on the North Anatolian Fault. There are serious forecasts of future seismic activities around istanbul estimating a 7.5 Richter scale earthquake with a probability of 50% in the next 30 years. According to a most probable scenario analysis, human casualties will reach 73,000 deaths and 120,000 severely injured.

In view of the above figures and estimates and especially after the 1999 earthquakes, Istanbul Greater Municipality, and the Government of Türkiye are both very determined and committed to initiate a program for a better seismic risk mitigation and emergency preparedness.

After series of consultations with Turkish Government Authorities at the central and provincial level in İstanbul, with local authorities, finance organizations, banks, universities, experts, citizens, the project titled "İstanbul Seismic Risk Mitigation and Emergency Preparedness – ISMEP" have been formulated. It enhances not only sustainable infrastructure and other productive sectors to promote economic growth but improve people's lives.

2.1 Scope and the aim of the project

Istanbul Seismic Mitigation and Emergency Preparedness (ISMEP) Project

The objective of the ISMEP Project is to improve the City of Istanbul's resilience against a potential earthquake. This will be achieved through strengthening critical public facilities for earthquake resistance and enhancing the institutional capacity for disaster risk management and emergency preparedness. The Project comprises four components as follows:

Component A (Emergency Preparedness):

(i) provision of emergency equipment such as IT and emergency communication equipment, water storage tanks, power generators, emergency vehicles, etc.; (ii) public awareness and training; and (iii) technical assistance to enhance emergency preparedness and responses.

Component B (Seismic Risk Mitigation for Public Facilities):

(i) retrofitting/reconstruction of about 100 public buildings such as schools and hospitals; and (ii) feasibility studies, detailed designs, and construction supervision.

Component C (Enforcement of Building Codes):

(i) Public Awareness & Training(ii) Municipal Capacity Development

Component D (Project Management Support):

(i) operational costs, consultancies, and IT and office and equipment

3.0 ENVIROMENTAL AND SOCIAL MANAGEMENT PLAN

3.1 Definition

The consultants' understanding of the Environmental and Social Management Plan (ESMP) is aligned with the most recent definition provided in the revised KfW Environmental and Social Policy (ESP). According to this definition, an ESMP is:

"An instrument that details: (a) the measures to be taken during the implementation and operation of a project to eliminate or offset adverse environmental and social impacts, or to reduce them to acceptable levels; and (b) the actions needed to implement these measures."

3.2 Possible Environmental and Social Issues

Potential environmental and social issues related to seismic retrofitting and the reconstruction of public facilities may include, but are not limited to, the following:

- > Generation of public nuisance in the surrounding communities
- Temporary disruption of public services (e.g., education, health) during construction activities
- > Dust and noise pollution associated with demolition and construction works
- > Air pollution from the use of construction machinery and equipment
- > Traffic congestion and safety risks during material transportation
- > Improper handling, storage, or disposal of construction and demolition waste
- > Separate collection and disposal of solid waste at the source
- > Collection, storage, and recycling of packaging waste
- > Collection and safe disposal of medical waste (where applicable)
- Storage and disposal of hazardous waste, including chemicals, solvents, paints, etc.
- > Disposal and management of end-of-life tires
- > Identification and sorting of reusable/recyclable construction materials
- > Safe handling and disposal of asbestos-containing materials (e.g., insulation, pipes)
- > Management of potentially contaminated soil or groundwater
- > Management of radioactive materials (if present or encountered)
- > Transportation and disposal of debris in licensed disposal sites
- > Potential impact on buildings or sites of architectural, historical, or cultural significance
- > Occupational health and safety risks for workers on-site
- > Gender-based exclusion or discrimination during stakeholder engagement
- Barriers to vulnerable groups (e.g., disabled persons, elderly) in temporary access arrangements
- > Landscape degradation or loss of urban green spaces if vegetation is not preserved
- > Risk of poor community perception due to insufficient information or engagement

The **Istanbul Project Coordination Unit (IPCU)** monitors all the above-mentioned environmental and social aspects through a combination of:

- > On-site inspections and site audits
- > Desk-based reviews and document verification
- > Implementation support to contractors and supervision consultants
- > Capacity building and institutional strengthening activities
- Corrective action planning and enforcement of mitigation measures

All mitigation actions are implemented in accordance with the applicable national legislation, KfW's Environmental and Social Policy (including its Exclusion List and Environmental and Social Standards), and good international industry practices such as the World Bank Group's EHS Guidelines.

3.3 Environmental Legislations

In line with project sustainability objectives, relevant Turkish environmental legislation has been thoroughly reviewed. Compliance requirements and legal obligations were assessed to identify applicable mitigation measures and monitoring activities aimed at reducing potential adverse environmental impacts.

The primary environmental legislation in Türkiye is the Environmental Law (Law No. 2872), which entered into force in 1983. It forms the legal foundation for environmental protection and management across the country. Over the years, several regulations have been issued under this Law, many of which have undergone updates to align with Türkiye's international commitments and evolving environmental policy.

Türkiye became a party to the Paris Agreement at the United Nations General Assembly in September 2021. The agreement was ratified by the Turkish Grand National Assembly and published in the Official Gazette No. 31621 dated 7 October 2021. In accordance with the agreement, Türkiye has committed to:

- Reducing CO₂ emissions
- Limiting the use of fossil fuels
- Promoting renewable energy sources
- Protecting natural carbon sinks

Türkiye has also announced its intention to reach net-zero emissions by 2053, with interim targets set for 2030. In parallel, the Green Deal Action Plan ("Yeşil Mutabakat Eylem Planı") was published in the Official Gazette No. 31543 dated 16 July 2021. This national roadmap aims to guide Türkiye's transition to a sustainable, circular, and resource-efficient economy in line with EU and global trends in environmental policy and climate governance.

Consequently, many existing environmental regulations are currently under revision or have already been updated to reflect the goals outlined in the Paris Agreement and the Green Deal Action Plan. In the following sections, each relevant regulation is presented as a sub-heading, including a summary of its scope, compliance requirements, and how it applies to the project activities. Where applicable, the most recent amendments or versions have been referenced.

3.3.1 Environmental Impact Assessment Regulation

The legal basis of Environmental Impact Assessment in Türkiye is Article 10 of the Environmental Law No. 2872 (enacted in 1983), which stipulates that:

"Organizations, corporations, and enterprises whose planned activities have the potential to cause environmental harm are required to prepare an Environmental Impact Assessment (EIA) Report. These reports must evaluate all possible environmental impacts and describe measures to treat residues and wastes, along with mitigation measures to minimize adverse environmental effects."

The Environmental Impact Assessment Regulation was initially published in the Official Gazette No. 21489 on 7 February 1993 and has since been amended multiple times. The most recent consolidated

version was published in the Official Gazette No. 29186 dated 25 November 2014, with the latest amendment issued in the Official Gazette No. 31907 dated 29 July 2022.

The purpose of the Regulation is to define the administrative and technical principles to be followed during the EIA process.

In the case of the ISMEP project, neither seismic retrofitting nor the demolition and reconstruction of public buildings triggers the EIA requirement under the current Regulation. This is because the project activities take place within previously developed urban sites, replacing existing structures without changing the land use or introducing new industrial processes that could cause significant environmental effects.

As no substantial changes are expected site activities or emissions, no new environmental impact is foreseen beyond the existing baseline conditions. Therefore, the EIA process is not applicable under Turkish legislation for the scope of this project.

The responsibility for determining the necessity of an EIA lies with the Istanbul Project Coordination Unit (IPCU), while the approval authority is the Ministry of Environment, Urbanization and Climate Change (MoEUCC). Should any future subproject fall within the scope of EIA as defined in the Regulation, the relevant implementing agency will be responsible for the preparation and submission of the EIA documentation.

3.3.2 Water Pollution Control Regulation

The Water Pollution Control Regulation was originally enacted on 4 September 1988. The latest consolidated version was published in the Official Gazette No. 25687 on 31 December 2004, with subsequent amendments, the most recent of which was published in the Official Gazette No. 29589 on 10 January 2016.

This Regulation adopts two main principles for the protection of water resources:

- 1. Recognizing water bodies as ecosystems and preserving them in their natural state;
- 2. Enhancing and protecting water quality in accordance with national needs and international best practices.

Key provisions include:

- Protection of drinking water reservoirs through the establishment of buffer zones and strict land-use restrictions
- > Regulation and control of wastewater discharge practices

In Istanbul, water supply reservoir watersheds located within the boundaries of the Istanbul Metropolitan Municipality fall under the jurisdiction of the Istanbul Water and Sewerage Administration (ISKI). ISKI issued its own Regulation for the Protection of Drinking Water Basins on 23 January 2011, which was most recently amended on 10 October 2018. This regulation aligns with the national Water Pollution Control Regulation and defines four key protection zones around drinking water reservoirs:

Absolute Protection Zone (0–300 m)
 Measured horizontally from the maximum water level of the reservoir, no construction is

permitted within this zone, except for water treatment facilities. Land within this zone must be expropriated for protection purposes.

- Short-Distance Protection Zone (300–700 m) Existing structures may be preserved. Maintenance and repair works are permitted, provided there is no change in the building's footprint or intended use.
- Medium-Distance Protection Zone (700–1000 m) Similar to the short-distance zone; existing structures can be maintained, but no expansion or change of use is allowed.
- Long-Distance Protection Zone (1000 m to basin boundary) Residential development is allowed. Specific types of industrial activities may be permitted upon approval by the relevant Ministry and ISKI.

During the implementation of the Project, all school and hospital buildings subject to retrofitting or reconstruction must be screened against these watershed protection criteria. Site-specific screening should determine whether the project location falls within any of the above zones, and compliance must be ensured accordingly.

The ISKI Regulation is fully aligned with the Water Pollution Control Regulation issued by the Ministry of Environment, Urbanization and Climate Change (MoEUCC). In cases where ISKI provisions are silent, the relevant provisions of the national regulation shall apply.

3.3.3 Regulation on Assessment and Management of Air Quality

The first regulation concerning the protection of air quality in Türkiye was enacted in November 1986 and published in the Official Gazette No. 19269. This regulation established initial threshold values for dust and other airborne emissions.

Subsequently, the Regulation on the Assessment and Management of Air Quality came into force on 6 June 2008, published in the Official Gazette No. 26898, and rendered the previous air quality regulation obsolete. A minor amendment to this regulation was issued on 5 May 2009 in the Official Gazette No. 27219.

The current regulation aims to align national air quality management practices with EU environmental legislation and to define limit values and assessment methods for key air pollutants.

In the context of the ISMEP project, construction activities such as demolition, material scraping, retrofitting, and rebuilding may generate significant levels of dust and emissions, especially in densely populated urban settings. To mitigate these impacts, the following control measures are to be applied:

- > Use of dust suppression techniques during demolition and material removal
- > Installation of exhaust control systems and mufflers on heavy machinery and vehicles
- Erection of protective fencing, screens, or tents around construction sites and on transport trucks
- Provision of personal protective equipment (PPE) such as masks and respirators to site workers

The **contractor** will be fully responsible for implementing these measures, ensuring that activities are conducted in compliance with the regulation and that air quality is not adversely affected in surrounding residential or institutional areas.

3.3.4 The Exhaust Emission Control Regulation

The earlier version of Türkiye's exhaust emission legislation, enacted on 8 July 2005, was repealed and replaced by a new regulation published in the Official Gazette No. 27190 dated 4 April 2009. The latest consolidated version of this regulation was published in the Official Gazette No. 30004 on 11 March 2017.

This regulation sets forth emission limits for various categories of vehicles and outlines requirements for periodic inspection, maintenance, and emissions control. It also introduces standards aligned with the European Union (EU) directives on vehicle emissions.

In the context of ISMEP, this regulation is directly relevant to the selection and operation of vehicles and construction equipment used during retrofitting and rebuilding activities. The contractors are required to:

- Ensure that all vehicles and machinery used on-site comply with the applicable emission limits;
- > Conduct regular emissions testing and maintenance of all equipment;
- > Keep records of inspections, repairs, and emission control certificates;
- > Monitor emissions performance throughout the construction period.

Furthermore, the Ministry of Industry and Technology has issued additional regulations regarding type approval and emission control technologies for engines in compliance with EU standards. These complementary regulations must also be observed by contractors to ensure full legal compliance.

Annex 1 of this ESMF presents regulation outlines the national standards for permissible ambient pollutant concentrations, which serve as a reference for air quality assessments in and around construction sites.

3.3.5 Regulation of Environmental Noise Assessment and Management

Türkiye's first Noise Control Regulation was enacted in 1986 and amended in 2006. This version was later repealed and replaced by the Regulation on the Assessment and Management of Ambient Noise, published in the Official Gazette No. 26809 dated 7 March 2008. The most recent consolidated version was issued in the Official Gazette No. 27601 on 4 June 2010, with the latest amendment published in the Official Gazette No. 31712 on 7 January 2022.

This regulation sets forth noise and vibration exposure criteria, particularly for sensitive receptors such as residential areas, schools, hospitals, and cultural sites. It defines ambient noise level thresholds for various zones including:

- Railways and airports
- Industrial and commercial zones
- Construction sites
- > Outdoor machinery and equipment

The regulation also covers vibration thresholds that may pose risks to structural integrity.

During construction and retrofitting works under ISMEP, the ambient noise level must not exceed 70 Leq dB(A) at any time. To ensure compliance:

- > The contractor is fully responsible for implementing noise control measures and maintaining acceptable levels throughout the construction phase;
- The Engineer (Supervision Consultant) shall monitor, record, and report compliance on a regular basis as part of contracted site supervision duties;
- The Provincial Directorate of the Ministry of Environment, Urbanization and Climate Change (MoEUCC) and authorized municipal officials are responsible for conducting on-site inspections and measurements to enforce regulatory compliance.

Annex 2 of the ESMF presents a summary of the applicable ambient noise limits, including recommended thresholds as specified in the national Regulation on Ambient Noise.

3.3.6 Debris Removal Regulation

The Debris Removal Regulation outlines the technical procedures and administrative responsibilities related to the management of debris resulting from excavation, construction, and demolition activities. The regulation was enacted in March 2004 and published in the Official Gazette No. 25406 dated 18 March 2004. The latest amendment was issued in the Official Gazette No. 27533 on 26 March 2010.

The regulation clearly defines the roles and responsibilities of:

- Provincial governorates
- Municipal authorities
- > Operators of disposal and/or recycling facilities
- Construction companies (as waste producers)

In accordance with the regulation, during the retrofitting or reconstruction of buildings under the ISMEP project, contractors are required to:

- Implement all necessary measures to prevent and mitigate environmental impacts associated with debris generation and disposal;
- Sort reusable and recyclable materials at the construction site to promote circular waste management practices;
- Obtain necessary permits from relevant district municipalities for the transport and disposal of debris, or alternatively, contract authorized private companies duly licensed for such activities.

These measures must be implemented in compliance with the applicable Turkish legislation and municipal guidelines and should be documented and monitored throughout the construction period.

3.3.7 Medical Waste Management Regulation

The current Medical Waste Management Regulation was published in the Official Gazette No. 29959 on 25 January 2017, thereby repealing the earlier Medical Waste Control Regulation issued in the Official Gazette No. 25883 dated 22 July 2005.

This regulation governs the segregation, temporary storage, transportation, and disposal of medical waste. Medical waste is classified based on its nature and source, including:

- > Infectious waste primarily generated in laboratories
- > Pathological waste, mostly from operating rooms

> Sharps waste, such as incising and perforating medical instruments

These waste types must be collected separately at the point of generation by qualified medical personnel, without mixing with other waste streams.

Other waste types originating from hospitals—such as chemical, pharmaceutical, heavy metalcontaining waste, and radiographic film processing residues—are managed in accordance with the Hazardous Waste Management Regulation. Radioactive waste is handled under the framework of legislation issued by the Turkish Atomic Energy Authority (TAEK).

Municipalities are responsible for the transportation and final disposal of medical waste, through methods such as incineration, secure landfill, or sterilization, to eliminate any hazardous properties. This responsibility may be delegated to licensed third parties. In Istanbul, for instance, ISTAC (Istanbul Environmental Management Industry and Trade Inc.) oversees transporting medical waste to a designated site within the landfill area.

Prior to any retrofitting or construction activities involving hospital facilities, the contractor must review:

- > The hospital's existing medical waste management plan
- > The estimated volume of medical waste to be generated
- > The adequacy of on-site temporary storage and segregation infrastructure

In terms of liquid waste, hospital laboratory effluents are generally disinfected with hypochlorite, diluted, pH-adjusted, and then discharged into the municipal sewerage system. According to the ISKI Regulation on the Discharge of Wastewater into Sewerage Systems, the following substances are prohibited from entering the sewer network:

- Abrasive or corrosive substances
- > Wastewater with a pH lower than 6 or higher than 10
- Radioactive materials
- > Other hazardous or toxic compounds

Consequently, contractors must ensure that liquid waste generated during or after retrofitting activities is screened for the presence of such substances prior to discharge, and that treatment and discharge practices comply with relevant legislation.

3.3.8 Regulation for Handling of Asbestos Products

The original Regulation on the Handling of Asbestos Products was enacted on 26 December 2003 and published in the Official Gazette No. 25328. This regulation was later repealed and replaced by the Regulation on Health and Safety Measures While Working with Asbestos, published in the Official Gazette No. 28539 dated 25 January 2013. Subsequent amendments were made and published in the Official Gazette No. 28884 on 16 January 2014.

The current regulation primarily addresses the protection of workers' health and safety during the handling, removal, and disposal of asbestos-containing materials (ACMs). It sets forth:

- > Training requirements and certification for workers involved in asbestos-related tasks
- > Personal protective equipment (PPE) standards
- > Worksite containment and decontamination procedures

> Air quality monitoring and exposure limits for asbestos fibers

While occupational health and safety aspects are governed under this regulation, the management and disposal of asbestos waste—classified as hazardous waste—is regulated under the Hazardous Waste Management Regulation.

During ISMEP implementation, especially in retrofitting or demolition of older public buildings (e.g., schools and hospitals), contractors must:

- > Conduct pre-construction asbestos surveys to identify the presence of ACMs
- > Engage licensed asbestos removal professionals
- Ensure safe removal, packaging, and transportation of asbestos waste to authorized disposal facilities

All such activities must comply with the requirements of both the Health and Safety Regulation on Asbestos and the Hazardous Waste Management Regulation, ensuring the safety of workers, the public, and the environment.

3.3.9 Regulation for Radiation Safety

The Radiation Safety Regulation was enacted in March 2000, with the updated version published in the Official Gazette No. 25598 on 29 September 2004, and its most recent amendment issued in the Official Gazette No. 27600 dated 3 June 2010.

The regulation outlines the technical and administrative requirements for the control of sources emitting ionizing radiation, with relevance to medical institutions using diagnostic and therapeutic radiological equipment.

In Türkiye, the primary regulatory authority for radiation safety is the Turkish Atomic Energy Authority (TAEK). In accordance with national legislation:

- Any institution intending to use radiation-emitting devices (including hospitals) must obtain a license from TAEK before initiating such activities.
- Following licensing, the institution is also required to prepare an Accident and Emergency Plan, which must be reviewed and approved by TAEK.

Within the scope of the ISMEP project, for any hospital buildings subject to retrofitting that contain radiation-emitting equipment (e.g., radiology, oncology units), the following steps must be taken:

- 1. Prior to the design phase, hospital management should be requested to submit the approved Accident and Emergency Plan related to radiation safety.
- 2. The Consultant/Contractor, in coordination with hospital management, must review the plan and consult TAEK regarding any design-related requirements (e.g., shielding, spatial planning, ventilation, emergency exits).
- 3. Necessary design adaptations and mitigation measures must be integrated into the retrofitting plan and implemented accordingly.

Compliance with the Radiation Safety Regulation ensures that any health and safety risks associated with radiation exposure are minimized for both patients and personnel, and that emergency response capacity is in place in accordance with national standards.

3.3.10 Waste Management Regulation

The collection, handling, and disposal of hazardous waste generated on-site shall be carried out in full compliance with the provisions of the Waste Management Regulation.

In addition, the Contractor is responsible for adhering to the provisions of the Regulation on the Demolition of Buildings, particularly regarding the removal and transportation of excavation and demolition waste.

The Contractor shall ensure that:

- All required permits and licenses related to waste transportation, disposal, and demolition activities are duly obtained from the relevant authorities
- All waste management activities are conducted in accordance with applicable environmental legislation and technical standards
- Proper documentation and reporting procedures are maintained throughout the project implementation.

3.3.11 Building Demolition Regulation

The Building Demolition Regulation was published in the Official Gazette No. 31627 dated 13 September 2021. Its purpose is to establish the procedures and principles for the safe and environmentally sound demolition of buildings and structures, to protect human health, occupational safety, and the environment.

The Regulation applies to:

- > The demolition of buildings subject to building permits
- Other structural or retaining elements that affect the overall safety and stability of such buildings

It defines the roles and responsibilities of all parties involved, including building owners, contractors, project supervisors, and demolition experts. Key provisions include:

- > Preparation of a Demolition Plan and its approval by the relevant municipal authority
- > Ensuring worker health and safety during demolition activities
- Prevention of environmental damage, including proper handling of debris, dust, noise, and hazardous materials (e.g., asbestos)
- > Compliance with relevant waste management and occupational health and safety legislation

While the regulation focuses primarily on technical and administrative requirements for demolition, all activities must also comply with broader laws governing occupational health and safety, notably Law No. 6331 on Occupational Health and Safety, which regulates the duties, authorities, rights, and responsibilities of employers and employees to ensure safe working environments and improve workplace conditions.

3.3.12 Occupational Health and Safety Law

The purpose of this Law; To regulate the duties, authorities, responsibilities, rights and obligations of employers and employees to ensure occupational health and safety at workplaces and to improve existing health and safety conditions.

3.3.13 Health and Safety Conditions in the Use of Work Equipment Regulation

The Occupational Health and Safety Law (Law No. 6331) sets out the duties, authorities, responsibilities, rights, and obligations of employers and employees with the aim of:

- > Ensuring occupational health and safety in all workplaces,
- > Preventing work-related accidents and occupational diseases, and
- > Improving existing working conditions and overall workplace safety.

The Law applies to all public and private sector workplaces, including those engaged in construction, retrofitting, and demolition activities. It emphasizes the following key obligations:

- > Conducting risk assessments prior to the commencement of any physical works
- > Providing training and personal protective equipment (PPE) to all workers
- > Appointing certified occupational safety specialists and workplace physicians where required
- > Maintaining records of workplace incidents, near-misses, and corrective actions

Within the scope of the ISMEP project, all contractors must ensure full compliance with Law No. 6331, particularly in:

- Demolition and excavation work
- > Asbestos and hazardous materials removal
- Structural retrofitting will be carried out only after full evacuation of the buildings. No retrofitting activities will take place under occupied or live-use conditions.

Compliance with this law is essential to protect the health and safety of site workers and the surrounding community, and to ensure that construction activities are aligned with both national legislation and international best practices.

3.3.14 Zero Waste Regulation

In recent years, the Government of Türkiye has strengthened its regulatory framework on recycling and sustainable waste management. The Zero Waste Regulation was published in the Official Gazette No. 30829 dated 12 July 2019 and most recently revised on 9 October 2021.

The regulation sets forth the rules and procedures for the implementation of zero waste practices, with the aim of:

- > Promoting the systematic separation, collection, and recycling of waste at its source
- > Ensuring the efficient use of raw materials and natural resources
- > Protecting human health and the environment
- Supporting Türkiye's sustainable development goals

It defines the general principles regarding the establishment, expansion, and improvement of the Zero Waste Management System, including:

- > Monitoring and reporting requirements
- > Financial mechanisms and responsibilities
- Record-keeping and documentation standards

Under the ISMEP project, contractors and project implementers are required to integrate zero waste principles into their site management plans, especially during demolition and construction phases. Waste should be segregated at source, and recyclable materials should be handled in accordance with national standards and local municipal practices.

3.4 International Treaties and Conventions

All relevant international environmental treaties and multilateral agreements to which Türkiye is a party or signatory have been reviewed as part of the environmental and social assessment process. Among these, only one convention has direct relevance to the project scope and geographic context:

The Ramsar Convention on Wetlands of International Importance Especially as Waterfowl Habitat, which Türkiye acceded to via a Council of Ministers Decision dated 15 March 1994.

Although Türkiye hosts a total of nine designated Ramsar sites, none of these sites are located within or near the Istanbul project area. As such, no direct implications under the Ramsar Convention are foreseen for the proposed project interventions.

The review also confirmed that the project will not affect any other protected sites designated under international conventions such as the Convention on Biological Diversity, UNESCO World Heritage Convention, or Bern Convention on the Conservation of European Wildlife and Natural Habitats.

3.4.1 Cultural Heritage International Conventions

Over the past century, there has been a growing global awareness of the importance of preserving cultural and historical heritage, along with the understanding that it is the duty of humanity to safeguard the works of previous generations for the benefit of future ones.

The first international discussion on this matter took place at the First International Congress of Architects and Technicians of Historic Monuments, held in Athens in 1931. The conclusions of this congress led to the adoption of the Athens Charter for the Restoration of Historic Monuments, recognized as the first international document on cultural heritage preservation. These principles were further developed in the Carta del Restauro in Italy in 1932.

Since then, numerous international documents, charters, conventions, declarations, agreements, and recommendations have been developed to support the preservation and sustainable management of cultural and natural heritage. Türkiye is a party or signatory to several of these international instruments. The most relevant ones for this project, along with their key objectives, are listed below:

- The Venice Charter (1964): First comprehensive international charter on cultural heritage conservation. It defines cultural heritage and outlines principles for its preservation and restoration.
- The Amsterdam Declaration (1975): Introduces the concept of integrated conservation within land-use planning. Emphasizes the role of local authorities and citizen participation, requiring legal, administrative, and financial adaptations.
- The Granada Convention (1985):
 European Convention on the Protection of the Architectural Heritage. Highlights the sociocultural and economic value of architectural heritage in improving quality of life.

➢ The Washington Charter (1987) − ICOMOS:

Focuses on the preservation of historic towns and urban areas, complementing the principles of the Venice Charter.

- Council of Europe Recommendations
 - R (89) 5: Protection and enhancement of archaeological heritage in urban and rural planning
 - o R (90) 20: Conservation of industrial, technical, and civil engineering heritage
 - R (91) 6: Promotion of funding for architectural heritage conservation
 - R (91) 13: Protection of 20th-century architecture
 - R (93) 9: Protection of architectural heritage against natural disasters
 - $\circ~$ R (95) 3: Harmonization of documentation methods for historic buildings
 - $\circ~$ R (95) 9: Integrated conservation of cultural landscapes
 - $\circ~$ R (95) 10: Sustainable tourism policies in protected areas
- Barcelona Declaration (1995): Promotes integrated cultural cooperation among Euro-Mediterranean partners, including Türkiye.
- Bologna Declaration (1996): Recognizes cultural heritage as a driver of economic development. Encourages integrating heritage into public/private investment, tourism, and regional planning.
- Helsinki Declaration (1996):
 Emphasizes the political and economic dimensions of cultural heritage conservation.
 Advocates for sustainable tourism and multilevel stakeholder involvement.
- UNESCO World Conference on Cultural Policies Stockholm (1998): Adopts an Action Plan highlighting capacity building, the interdependence of culture and sustainable development, and heritage as a tool for employment and income generation.
- Portorož Declaration Slovenia (2001): Stresses the role of voluntary organizations in heritage protection, addresses challenges of globalization, and supports the European Heritage Network.

3.4.2 Environmental International Conventions

As part of the environmental due diligence for this project, all relevant international environmental treaties and conventions to which Türkiye is a party or signatory have been reviewed. The following conventions are particularly relevant with respect to biodiversity protection, pollution prevention, marine and terrestrial ecosystem conservation, ozone layer protection, and climate change mitigation. Türkiye's participation in these conventions demonstrates its commitment to aligning national policies with international environmental standards.

The key international environmental agreements include:

- European Culture Convention
 Law No. 6998 Official Gazette No. 9635, 17 June 1957
- UN Convention for the Protection of Birds
 Official Gazette No. 12480, 17 December 1966
- Barcelona Convention for the Protection of the Marine Environment and the Coastal Region of the Mediterranean
 Ratified on 12 June 1976
- World Heritage Convention (Paris, 1972)
 Official Gazette No. 17670, 20 April 1982
- Geneva Convention on Long-Range Transboundary Air Pollution
 Council of Ministers Decision, 21 January 1983 Official Gazette No. 17996, 23 March 1983

- Paris Convention on the Protection of World Cultural and Natural Heritage Law No. 2658 – Official Gazette No. 17959, 4 February 1983
- Bern Convention on the Conservation of European Wildlife and Natural Habitats Official Gazette No. 18318, 20 February 1984
- Vienna Convention for the Protection of the Ozone Layer Law No. 3655 – Official Gazette No. 20554, 20 June 1990
- MARPOL 73/78 International Convention for the Prevention of Marine Pollution from Ships Ratified on 24 June 1990
- Ramsar Convention on Wetlands of International Importance Official Gazette No. 21937, 17 May 1994
- Bucharest Convention on the Protection of the Black Sea Against Pollution Ratified on 15 January 1994
- Basel Convention (and Protocol) on the Transboundary Movement of Hazardous Wastes Official Gazette No. 21935, 15 May 1994
- Black Sea Dumping Protocol Ratified on 29 March 1994
- Montreal Protocol on Substances That Deplete the Ozone Layer Law No. 4118 – Official Gazette No. 22341, 12 July 1995
- UN Convention on Biological Diversity (CBD)
 Law No. 4177 Official Gazette No. 22860, 27 December 1996
- CITES Convention on International Trade in Endangered Species of Wild Fauna and Flora Law No. 4041 – Official Gazette No. 22672, 20 June 1996
- Ministerial Conferences on the Protection of Forests in Europe (Strasbourg and Helsinki) National coordination structures established; criteria for sustainable forest management adopted
- UN Convention to Combat Desertification (UNCCD)
 Signed in 1994, ratified in 1998
- Protocol for the Protection of the Mediterranean from Land-based Sources of Pollution Initial ratification: 18 March 1987; revised protocol signed in 2002
- Florence Convention European Landscape Convention Official Gazette No. 25181, 27 July 2003
- Izmir Protocol on Hazardous Waste Transfer in the Black Sea Region Ratified on 3 December 2003
- United Nations Framework Convention on Climate Change (UNFCCC) Türkiye became a party on 24 May 2004
- Convention on the Protection of Biodiversity and Landscape in the Black Sea Region Ratified on 12 August 2004
- Kyoto Protocol
 Ratified on 26 August 2009
- Stockholm Convention on Persistent Organic Pollutants (POPs) Ratified on 12 January 2010
- Paris Agreement (UNFCCC)
 Signed in 2016, approved by Law on 7 October 2021 (Official Gazette No. 31621)

3.5 Environmental and Social Framework of KfW Development Bank

Sustainability—and its environmental and social dimensions—is a foundational principle that governs KfW Development Bank's operations across all sectors. KfW's Environmental and Social Policy (ESP) is mandatory and fully integrated into its business processes. All financed projects must comply with the ESP to secure KfW support.

The Environmental and Social Exclusion List—applicable to both KfW and the Istanbul Project Coordination Unit (IPCU)—defines prohibited activities. KfW will not knowingly finance projects involving any activity included in this list (see Annex 3).

The ESP outlines the requirements for:

- > Project screening and categorization
- Environmental and Social Due Diligence (ESDD)
- > Assessment and management planning
- Information disclosure and consultation
- > Monitoring, reporting, and grievance redress
- > Roles and responsibilities between KfW and the Client

Each project is assigned an environmental and social risk category, as follows:

Category A:

Projects likely to have significant adverse environmental and social impacts—which may be irreversible, cumulative, diverse, or unprecedented. Impacts often extend beyond the physical project area.

- Category B+ :
- Project is expected to have single but significantly adverse environmental and social impacts, it can be classified as Category B+. These impacts are more serious than standard Category B, but do not reach the complexity and scale of Category A.
- Category B:

Projects with limited, site-specific, and manageable environmental and social impacts, generally reversible and non-cumulative. These impacts can be addressed through standard mitigation measures. Category C:

Projects expected to have minimal or no adverse environmental and social impacts.

Category FI (Financial Intermediary): Projects that involve lending through a financial intermediary, whereby the FI assumes responsibility for the selection, appraisal, and monitoring of sub-projects.

KfW requires its Clients to:

- > Conduct Environmental and Social Assessments in line with the project's risk category;
- Develop and implement Environmental and Social Management Plans (ESMPs) or Planning Frameworks (ESMPFs), especially when the full scope is unknown at appraisal stage;
- Apply the principle of proportionality, ensuring that mitigation and monitoring measures are tailored to the project's scale and complexity;
- Continuously track risks and impacts, and update management tools throughout the project lifecycle;
- > Consider alternative approaches to minimize environmental and social harm

KfW places emphasis on transparency and accountability. It requires that:

- Clients disclose relevant environmental and social information in a timely and accessible manner, in a format understandable to project-affected people;
- Key documents are published on KfW's website for consultation;
- Regular monitoring and performance reports are submitted to KfW;
- KfW conducts supervision missions at defined intervals to verify compliance and support implementation.

A Grievance Redress Mechanism (GRM) must be established at project level (also known as IPCU Complaint Handling Policy) to:

- Receive and address concerns from project-affected people;
- Allow for anonymous submissions if requested;
- Protect complainants against any form of retaliation.

4. CURRENT PROCEDURES, POLICIES, AND PRACTICES FOR THE MANAGEMENT OF E&S IMPACTS

4.1 Handling of Asbestos

As part of the Environmental and Social Management Planning Framework (ESMPF), an assessment will be carried out to determine the presence of asbestos-containing materials (ACMs) in older buildings subject to demolition or retrofitting activities. If ACMs are identified, their management, removal, and disposal must fully comply with applicable national legislation, particularly the Regulation on Health and Safety Measures While Working with Asbestos (Official Gazette No. 28539, 2013) and related hazardous waste regulations.

The Contractor shall be responsible for the safe and compliant handling of asbestos. The following sequential steps are to be undertaken:

- 1. Initial Investigation
 - Consult the building owner/manager and review existing documentation, including designs and "as-built" drawings, to identify any potential use of ACMs.
- 2. Preparation of an Asbestos Management Plan (AMP)
 - Develop a comprehensive plan for the safe removal, handling, transportation, and disposal of asbestos-containing materials in line with national legislation.
- 3. Mitigation and Disposal Arrangements
 - Implement strict on-site mitigation measures, including use of qualified personnel, personal protective equipment (PPE), and containment techniques.
 - Arrange transportation and final disposal through licensed facilities, such as IZAYDAŞ or other authorized hazardous waste incineration or landfill sites.
- 4. Execution of Works
 - Conduct all retrofitting and demolition works in accordance with the approved Asbestos Management Plan. Ensure site supervision and documentation during the process.

It is the Contractor's responsibility to ensure all asbestos-related risks are effectively mitigated and that public health and environmental safety are not compromised. The Client and supervising consultant will verify compliance as part of the overall Environmental and Social monitoring system.

4.2 Ozone Depleting Materials

As part of the project scope, certain activities may involve the cleaning, upgrading, or replacement of ventilation, heating, and cooling systems (HVAC) using mechanical or chemical methods. These operations carry a potential risk of involving materials that may contribute to ozone layer depletion.

Türkiye is a signatory to the Montreal Protocol, which strictly bans the production, use, and import/export of ozone depleting substances (ODS), including CFCs, HCFCs, halons, and other regulated chemicals.

In line with national commitments and international obligations:

- > The use of any ozone-depleting substances is prohibited under this Project.
- All equipment, refrigerants, and cleaning agents used during project implementation shall be pre-screened and approved to ensure full compliance with the Montreal Protocol and relevant national regulations.
- The Contractor shall ensure that no banned substances are used and shall maintain appropriate documentation and supplier certifications for the materials and systems applied.

It is not anticipated that any ozone-depleting materials will be used or approved under this Project. Nevertheless, preventive screening and verification procedures shall be in place to ensure compliance throughout the implementation period.

4.3 Hazardous and Waste Management

The collection, storage, transportation, and disposal of hazardous waste generated during construction, retrofitting, or demolition activities shall be conducted in full compliance with relevant Turkish environmental legislation, including but not limited to:

- Waste Management Regulation
- ➢ Waste Oil Control Regulation
- > Waste Battery and Accumulator Control Regulation
- > Regulation on Substances Depleting the Ozone Layer

All hazardous waste handling must be carried out by licensed personnel and transferred to licensed waste disposal or treatment facilities authorized by competent authorities (e.g., MoEUCC).

Specific provisions include:

- Chemical and construction material packaging containing hazardous substances shall also be classified as hazardous waste.
- Temporary storage areas for hazardous waste shall be clearly marked with warning signs, labeled in accordance with national standards, and equipped with secondary containment systems (e.g., bund walls, drip trays) to prevent spillage and environmental contamination.
- Separate waste streams (e.g., oils, batteries, contaminated soil or filters) shall be segregated at source and stored in dedicated containers.

The Contractor shall be responsible for ensuring:

- > Proper on-site hazardous waste management procedures
- > Training of personnel in handling hazardous materials
- > Maintenance of records related to waste generation, transportation, and disposal
- > Periodic reporting to IPCU and relevant authorities

All hazardous waste management practices will be monitored and verified by the Client's supervision consultant as part of the environmental and social monitoring system.

4.4 Contractor Management

All construction, retrofitting, and demolition works under the Project are being executed by contractors engaged through a framework contract with the Istanbul Project Coordination Unit (IPCU).

This framework contract has been amended and updated to reflect the Environmental and Social (E&S) requirements introduced under the new project instruments (such as ESMF, ESMPs, SEP, and LMP).

The IPCU holds primary responsibility for the day-to-day oversight and performance monitoring of the contractors, including:

- > Integration of E&S provisions into contractor obligations
- Verification of compliance with environmental, social, occupational health and safety, and stakeholder engagement requirements
- Conducting regular site inspections and review of documentation (permits, training records, waste disposal manifests, etc.)
- Holding weekly progress and coordination meetings with contractors and supervision consultants
- > Issuing non-compliance notices and corrective action requirements, where necessary

Through this structured engagement, IPCU ensures that contractors remain aligned with both national regulatory obligations and KfW's Environmental and Social Policy throughout the implementation period.

4.5 Labor and Working Conditions

All civil works will be conducted on-site, and the Contractor is responsible for ensuring adequate and properly managed labor arrangements throughout the implementation period. This includes the allocation of enough personnel, and provision of basic facilities, such as:

- Rest areas and shelter
- Sanitary facilities (toilets, washing stations)
- > Secure and organized storage areas for tools and equipment

In line with national labor legislation and the project's Environmental and Social requirements, the Contractor is obligated to engage all workers through formal employment contracts, which must clearly outline:

- > Terms and conditions of employment
- > Working hours and overtime arrangements
- Code of conduct and disciplinary procedures
- Health and safety obligations
- Rights to social protection and benefits

All workers must comply with national Occupational Health and Safety (OHS) legislation, which covers key topics including:

- > Workplace safety, hazard prevention, and accident reporting
- Use and maintenance of Personal Protective Equipment (PPE)
- > Prevention of injuries, occupational diseases, and fatalities
- Safe handling of hazardous materials
- > Housekeeping and cleanliness of work areas

The Contractor is responsible for:

> Training all personnel on health and safety procedures

- > Enforcing safety rules and disciplinary action for non-compliance
- Providing and maintaining all necessary PPE
- > Keeping OHS logs and incident reports

IPCU regularly monitors labor conditions and OHS performance through weekly progress meetings and on-site reviews. In addition, the national labor inspectorate may conduct unannounced inspections to verify compliance.

The Project strictly prohibits the use of:

- Informal labor
- > Forced or bonded labor
- Child labor

In accordance with the Public Procurement Law and Turkish labor law, the Contractor may only engage formally registered workers with valid contracts. Workers are entitled to freedom of association, including the right to join trade unions.

All relevant labor and OHS standards are clearly outlined in the Technical Specifications, under the section titled *"Civil Works Special Technical Specifications: Occupational Health and Safety."* Additionally, the **Labor Management Procedures (LMP)** prepared by the IPCU for the World Bank are to be used as an integral part of the procurement documentation. This document sets out comprehensive requirements related to labor conditions, worker rights, grievance mechanisms, and OHS provisions.

The LMP can be accessed through the following links:

- English version (LMP)
- Turkish version (İYP)

4.6 Community Health and Safety

The construction phase of the Project may generate temporary adverse impacts on community health, safety, and well-being. These impacts are typically associated with:

- > Restricted access to buildings and pedestrian pathways
- > Increased noise and dust due to excavation, demolition, or machinery use
- > Storage of construction materials on or near public areas
- > Potential unauthorized access to active construction zones
- > Presence of external workers in proximity to residential or sensitive areas

The scale of impact will vary depending on the scope of civil works and site conditions, including location, number of workers, and proximity to schools, hospitals, or residential areas.

The Contractor is required to implement comprehensive community health and safety measures, in accordance with national legislation and IPCU's institutional procedures. These include:

- > Fencing off construction zones to prevent unauthorized access by the public
- > Secure storage of construction materials to avoid physical hazards
- Installation of clear warning signs and safety instructions at site boundaries and high-risk zones

- > Scheduling of works to minimize disruptions near sensitive receptors (e.g. schools, hospitals)
- Use of noise barriers, dust suppression measures, or buffer zones where construction activities may generate significant disturbance
- Coordination with local authorities and emergency services for public safety and access management during construction

The Contractor shall be responsible for continuous monitoring and adaptation of these measures throughout the construction period. IPCU will verify implementation and raise any non-compliance issues through routine site inspections and progress meetings.

4.7 Land Acquisition and Involuntary Settlement

All civil works under the Project are carried out on previously developed public land, with reconstruction taking place on the same footprints of demolished buildings (e.g., schools and hospitals). The sites selected for retrofitting or rebuilding are owned and managed by public institutions, and no private land acquisition is required.

Since the beginning of ISMEP activities in 2006, there has been no recorded instance of land acquisition or involuntary resettlement. All reconstruction activities have been implemented within the existing plot boundaries of the original facilities.

Therefore, the Project does not trigger any land acquisition or resettlement-related provisions undernationallaworKfW'sEnvironmentalandSocialPolicy.Nevertheless, IPCU ensures that:

- > Legal titles of all project sites are verified before works commence
- > No physical or economic displacement of people, businesses, or informal users is involved
- Stakeholders are informed of construction timelines and potential temporary access restrictions through appropriate consultation channels

4.8 Cultural Heritage Protection

The city of Istanbul is home to outstanding cultural heritage assets, shaped over centuries by Roman, Byzantine, and Ottoman civilizations. In recognition of its historical significance, The Historic Peninsula of Istanbul was inscribed in the UNESCO World Heritage List in 1985. The city hosts a wide range of urban, archaeological, and natural heritage sites, including individual monuments and buildings of exceptional value.

All cultural heritage assets—whether urban, archaeological, or natural—are subject to protection under the Law No. 2863 on the Conservation of Cultural and Natural Assets, which was revised via Delegated Legislation No. 703, effective 2 July 2018. Other applicable regulations and planning decisions further guide interventions on protected structures.

Key authorities involved in heritage protection include:

- Ministry of Culture and Tourism (MoCT) General Directorate for Cultural Heritage and Museums
- Regional Preservation Councils (Koruma Kurulları) No. 1, 2, and 3, which oversee specific zones of Istanbul (territorial responsibility shown in Annex 4)
- KUDEB (Preservation, Implementation and Control Office) under the Istanbul Metropolitan Municipality, responsible for minor repairs (e.g., roof, painting, electrical systems)

Before any intervention on a listed cultural heritage site, the following must be ensured:

- Submission of required documentation and project proposals to the relevant Regional Preservation Council
- In cases involving structural modifications, retrofitting or reinforcement, a structural report approved by the local municipality is mandatory
- Reference to standard submission requirements shown in Annex 4, which vary based on the degree of protection and nature of the proposed intervention

All assessments and approvals must align with national and local legislation, and no civil works may proceed without clearance from the competent heritage authority.

The Ministry maintains a centralized inventory system—initiated in 1976 following European Council standards—to record all officially registered sites, buildings, and natural assets of cultural significance.

Listed assets are categorized as follows:

- 1. Historical Sites
- 2. Natural Sites
- 3. Archaeological Sites
- 4. Urban Sites
- 5. Combined Sites
- 6. Immovable Cultural and Natural Assets, such as:
 - o Monuments
 - o Civil and religious buildings
 - Castles, cemeteries, tumuli
 - Monument trees, caves, waterfalls, fairy chimneys, etc.

All project-related interventions must comply with these protection standards. IPCU is responsible for verifying that contractors obtain necessary permits and clearances before commencing any work on or near heritage-protected areas.

4.9 Gender Equality and Prevention of Sexual Harassment and Gender-Based Violence

The Project and its subprojects are designed and implemented in line with national laws and international standards that promote equal participation and benefits for both men and women. Currently, there are no identified gender disparities or discriminatory practices in project design or implementation.

4.9.1 Gender-Responsive Site Arrangements

Currently, there are no identified gender disparities or discriminatory practices in project design or implementation. However, to maintain equitable and inclusive work environments, the Contractor is responsible for ensuring that all construction sites provide:

- > Separate and adequate toilet, changing, and shower facilities for male and female employees
- > Designated toilet facilities for male and female visitors
- > Safe and inclusive workspaces for all workers, regardless of gender

In sites where many workers are present, there may be increased risks of gender-based harassment, especially toward female employees, visitors, or vulnerable individuals (e.g., hospital patients). To mitigate such risks:

- The Contractor must enforce a clear Code of Conduct that strictly prohibits any form of sexual harassment, bullying, or inappropriate behavior on site.
- The Code of Conduct must be communicated to all workers and reinforced through mandatory training.
- > The Code of Conduct is provided in Annex 8.

4.9.2 Prevention of Sexual Harassment, Abuse and Gender-Based Violence (SH/SEA)

In accordance with national legislation, all forms of sexual harassment, abuse, and gender-based violence (GBV) are strictly prohibited and subject to legal sanctions. The workforce will primarily consist of locally hired staff, and a significant labor influx is not anticipated. Therefore, the overall risk of sexual exploitation and abuse/sexual harassment (SEA/SH) is considered low.

Nevertheless, during all phases of the project, the following principles must be upheld by the Contractor and project staff:

a. Foster a culture of respect and high standards of ethical behavior across institutions.

b. Establish and maintain standards aimed at preventing SH/SEA and other forms of misconduct.

c. Provide a safe and trusted environment for reporting SH/SEA concerns, ensuring confidentiality and dignity.

d. Protect survivors, whistle-blowers, and witnesses from any retaliation.

e. Maintain robust policy frameworks and mechanisms to handle allegations and incidents effectively.

f. Deliver mandatory training on codes of ethics/conduct, harassment, and misconduct.

g. Support institutions and stakeholders to implement policies addressing SH/SEA.

All workers must comply with the Code of Conduct provided in Annex 8, which outline expected behaviors and consequences of violations.

To effectively address any SEA/SH cases, the project also integrates a confidential, survivor-centered grievance mechanism, coordinated with national referral systems. The process involves the following key steps:

A. Receipt of Complaint

SEA/SH complaints may be submitted through multiple channels, including hotline, email, in-person reporting, or complaint boxes. Complainants will be informed about the confidentiality of the process and available medical, legal, and psychosocial support services.

B. Initial Assessment and Immediate Response

Complaints will be assessed promptly to determine urgency. Where necessary, survivors will be referred to support services within 24 hours.

C. Referral to National Systems

If a case qualifies as SEA/SH under national law, it will be referred to the national legal and support system, including law enforcement and protection services.

D. Resolution and Feedback

Survivors will be kept informed about the steps taken and outcomes, ensuring their informed consent, dignity, and safety throughout the process.

E. Monitoring and Reporting

The IPCU will monitor SEA/SH grievance management and include both qualitative and quantitative indicators in biannual reports to the World Bank. All data will be fully anonymized to protect survivors' identities.

To ensure continuous awareness and prevention:

- Notice boards at worksites will display key information on expected behavior and SEA/SH reporting procedures.
- Grievance Mechanism sessions will be integrated into induction trainings and refresher sessions.
- Printed materials (brochures, posters) and digital resources (project website) will inform stakeholders.
- Campaigns will emphasize the project's zero-tolerance policy and promote a respectful workplace environment for all.

4.10 Vulnerable Groups

In Türkiye, universal accessibility standards have increasingly been adopted in the design of hospitals and public buildings. Existing infrastructure often includes ramps, elevators, tactile surfaces, and sanitary facilities equipped with support railings, ensuring basic accessibility for persons with disabilities and limited mobility.

As part of the environmental and social assessment process, vulnerable individuals or groups who may be disproportionately affected by the Project will be identified during the initial screening and sitespecific analysis of each subproject. This may include, but is not limited to:

- > Elderly persons
- > Children
- Persons with disabilities
- Women-headed households
- Low-income or marginalized populations
- > Migrants or non-native language speakers
- > Individuals with limited access to services and information

5.0 E&S ASSESMENT PROCEDURES FOR EACH ACTIVITY IN THE PROJECT

ISMEP has been classified by KfW as Category B, indicating that the potential environmental and social impacts are limited in scope, site-specific, and readily mitigable using established procedures. The categorization aligns with the environmental and social risk management approach adopted by the Istanbul Project Coordination Unit (IPCU) since the inception of the ISMEP program in 2006.

For this Project, while World Bank Operational Directive OD 4.01 remains a relevant historical reference due to its material equivalence with KfW's Environmental and Social Policy (ESP), this ESMF also draws upon the updated World Bank Environmental and Social Framework (ESF, effective since October 1, 2018) and the corresponding Environmental and Social Standards (ESS1–ESS10), as adopted in recently implemented international financing projects in Türkiye.

These updated standards—building on global best practices—have further enhanced IPCU's institutional capacity in environmental and social risk management, and informed the structure, scope, and procedural integrity of this ESMF.

In preparation of this Environmental and Social Management Framework (ESMF), KfW's Environmental and Social Policy (ESP) and applicable Turkish environmental and social legislation have been thoroughly reviewed to ensure full compliance and alignment with best practices.

Since its launch, IPCU has implemented ISMEP as Türkiye's first comprehensive disaster risk reductionprogram,guidedbytheprinciple:"Taking Precautions and Reducing Damage Before Disasters Occur."

The program's achievements have been widely recognized both nationally and internationally. A comprehensive review conducted by the World Bank's Independent Evaluation Group rated ISMEP's performance as "Highly Satisfactory" and highlighted the project as a global best practice under the title "Lessons from Türkiye" for other disaster-prone countries.

IPCU continues to assess the potential environmental and social risks of subprojects using a Preconstruction Level Environmental and Social Checklist and/or E&S Screening Form, which both serve as standardized tools for site-level screening and classification. This checklist and screening form are provided in Annex 5 and Annex 9.

6.0 STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

6.1 Identification of Institutional and Project Stakeholders

The Istanbul Project Coordination Unit (IPCU) recognizes the importance of inclusive, timely, and transparent stakeholder engagement in ensuring the effective implementation of the Project and its subprojects.

Stakeholders are grouped into the following categories based on their roles, influence, or vulnerability in relation to the Project:

A. Governmental Authorities (National Level)

- Ministry of Culture and Tourism (MoCT)
- > Ministry of Environment, Urbanization and Climate Change (MoEUCC)
- Ministry of Treasury and Finance
- Ministry of Health
- Disaster and Emergency Management Authority (AFAD)
- General Directorate of Foundations
- > Higher Council for the Protection of Cultural and Natural Assets
- > The Grand National Assembly of Türkiye

B. Local and Regional Authorities (Istanbul)

- Istanbul Governor's Office
- Istanbul Metropolitan Municipality (IMM)
- Relevant District Municipalities

- > Regional Preservation Councils for Cultural and Natural Assets (No. 1, 2, 3)
- > Istanbul Directorate for Culture and Tourism
- Istanbul Provincial Directorate of MoEUCC
- > KUDEB (Preservation, Implementation and Control Office of IMM)
- Istanbul Water and Sewerage Administration (ISKI)

C. Civil Society, Professional Chambers, and Academia

- > Chamber of Architects
- > Chamber of Civil Engineers
- > Turkish Association for Conservation of Cultural Heritage (TAÇ)
- ÇEKÜL Foundation
- History Foundation
- Istanbul Technical University, Mimar Sinan Fine Arts University, Yıldız Technical University, Boğaziçi University, Yeditepe University

D. Affected Communities and Vulnerable Groups

- Residents in construction areas
- School and hospital users (students, patients, staff)
- > Persons with disabilities, elderly, and other vulnerable populations
- Local NGOs representing affected groups

6.2 Information Disclosure

Information disclosure is a key component of stakeholder engagement. The Project will ensure that relevant environmental and social information is shared proactively, in accessible formats and languages, and in a timely manner.

The following principles apply:

Types of Information to Be Disclosed

- > ESMF (this document) and subsequent Environmental and Social Management Plans (ESMPs)
- > Project descriptions and maps for relevant subprojects
- > Non-technical summaries of environmental and social risks and mitigation measures
- > Updates on project status and construction timelines
- > Grievance Mechanism procedures and contact information

Timing and Format

- > Draft documents will be disclosed at least 10 working days before finalization.
- > Documents will be published in Turkish and where relevant, in English.
- Public notices will be posted on IPCU's official website, project site boards, and relevant local government platforms.

Methods of Engagement

- > Website announcements and downloadable documentation
- > Email and official letters to institutional stakeholders

- > On-site information boards and visual signage
- > Consultation meetings where necessary (virtual or physical)
- > Inclusion of information in municipal newsletters or through school/hospital channels

Note: Details regarding grievance and complaint handling are described in Section 7.0 "Grievance Mechanism".

7.0 IPCU GRIEVANCE MECHANISM/ IPCU COMPLAINT HANDLING POLICY

The Istanbul Project Coordination Unit (IPCU) has established a formal **Grievance Mechanism (GM)** to address comments, concerns, complaints, and suggestions from project stakeholders and the public. This mechanism ensures that all grievances—whether related to environmental, social, occupational health and safety, or labor issues—are handled **promptly, fairly, and transparently**.

Objectives of the Grievance Mechanism

- To provide a clear and accessible channel for individuals and groups to raise concerns related to the Project
- To allow for timely and effective resolution of complaints and ensure they are addressed at the appropriate level
- > To strengthen **public confidence** in IPCU's implementation practices
- To enable IPCU to track trends and continuously improve project performance based on grievance feedback

Complaints, suggestions, or comments can be submitted through the following channels:

- Verbal grievances can be submitted in person at IPCU, or the telephone hotline: +90 (216) 505 55 00, operated by IPCU.
- E-mail : <u>info@ipkb.gov.tr</u>
- > Postal Address : IPCU, Kısıklı Mah. Alemdağ Yan Yolu Cad No:6, 34692 Üsküdar/İstanbul
- In-Person visit to IPCU (working hours only): Kısıklı Mah. Alemdağ Yan Yolu Cad No:6, 34692 Üsküdar/İstanbul
- Grievance or Suggestion Boxes located at various project sites for convenient access.
- > Social Media:
 - Twitter: https://x.com/ipkbgovtrFacebook: https://www.facebook.com/ipkbgovtrInstagram: https://www.facebook.com/ipkbgovtrInstagram: https://www.instagram.com/ismepipkb/LinkedIn: @iPKBWeb Site: https://www.ipkb.gov.tr/sikayet-formu/YouTube: https://www.youtube.com/c/%C4%B0PKBirimi

Anonymous Grievances can be submitted through the grievance boxes at project sites or via the online grievance form, ensuring confidentiality.

CIMER (Presidency's Communication Center):

CIMER serves as an official grievance mechanism where citizens can directly submit complaints and feedback to government authorities regarding any concerns as well as regarding the project.

 CIMER Portal
 : https://www.cimer.gov.tr/

 Call Center
 : 150

 Phone
 : +90 (312) 590 20 00

 Fax
 : +90 (312) 473 64 94

Mail : Complaints can be sent to the Presidency of the Republic of Türkiye Directorate of Communications.

In-Person : Individual applications can be made to the Directorate of Communications' regional offices.

> Istanbul Metropolitan Municipality Beyaz Masa Service:

Hotline: Dial 153 within Istanbul.Online Portal: https://beyazmasa.ibb.gov.tr/

> Foreigners Communication Center (YIMER):

YIMER provides a centralized grievance system specifically for foreign residents. It serves as an alternative and well-recognized channel for stakeholders to directly communicate complaints and feedback to government authorities regarding the project.

Website : http://www.yimer.gov.tr Call Center :157 Phone : +90 (312) 157 11 22 Fax :+90 (312) 920 06 09 Mail : Complaints can be sent to the Presidency of the Republic of Türkiye Directorate of Communications. E-mail : vimer@goc.gov.tr In-Person : Individual applications can be made to the Directorate General of Migration Management.

Grievance Submission Forms will be made available at IPCU office, IPCU webpage, and by the Contractors at construction sites

All complaints can be submitted anonymously, and all submissions will be handled in accordance with IPCU's commitment to non-retaliation and confidentiality.

Complaint Handling and Resolution Process

- 1. Receipt and Registration
 - All complaints are logged into a Complaint Tracking System, which records the submission date, issue, complainant info (if shared), and tracking number.
- 2. Assessment and Assignment
 - The complaint is reviewed within 3 working days and assigned to the relevant IPCU department or contractor representative, depending on the subject.
- 3. Investigation and Response
 - A response or proposed resolution is shared with the complainant within 15 working days, where possible.
 - Complex cases requiring site investigation or third-party consultation may take longer, with the complainant informed of the timeline.
- 4. Resolution and Closure
 - Once resolved, the corrective actions and outcome are documented, including the closing date and responsible person/unit.
 - The complainant is formally notified if contact details are available.
- 5. Follow-up and Learning
 - Recurrent complaints are analyzed to identify systemic issues and inform future project design improvements.
 - IPCU uses grievance feedback to update relevant E&S instruments, technical specifications, or contractor requirements.

IPCU is fully committed to ensuring that the grievance mechanism operates in a safe, confidential, and non-discriminatory manner. All individuals submitting a complaint have the right to do so without fear of retaliation and may choose to remain anonymous. The identity of complainants—when disclosed—will be protected and shared only with authorized personnel directly involved in the resolution process.

Special attention will be given to grievances related to gender-based violence (GBV), labor rights violations, and occupational health and safety issues, which will be handled with the highest degree of sensitivity, professionalism, and urgency.

For detailed procedural guidelines and responsibilities, please refer to the IPCU Complaint Handling Policy in Annex 6.

8.0 IMPLEMENTATION ARRANGEMENTS, ROLES AND RESPONSIBILITIES

8.1 Contractor's and Supervision and Design Consultants, IPCU Responsibilities

This section outlines the environmental and social responsibilities of the Contractor and the Supervision Consultant during the construction phase and presents the necessary operational measures for ensuring compliance with the Environmental and Social Management Framework (ESMF).

8.1.1 Contractor's Responsibilities

The Contractor is responsible for carrying out all construction and retrofitting activities in full compliance with:

- > National environmental and occupational health and safety legislation,
- > Relevant technical specifications, and
- > The mitigation measures detailed in this Framework.

In addition to the above, the Contractor shall ensure the implementation of the following environmental and social responsibilities:

- > The Contractor shall employ a qualified Environmental Engineer, who will be responsible for:
 - Overseeing the implementation of the C-ESMP and site-specific mitigation measures,
 - Coordinating with the Supervision Consultant and IPCU on all E&S compliance matters,
 - Preparing site-level environmental and social monitoring reports,
 - Ensuring that corrective actions are implemented in a timely manner.
- Implementation of a Contractor Environmental and Social Management Plan (C-ESMP) that aligns with the ESMF and includes specific procedures for environmental mitigation, OHS, labor management, and community relations.
- Fulfillment of all contractual environmental and social requirements, including provisions related to site-specific ESMPs, health and safety, and stakeholder engagement.
- > Adherence to Occupational Health and Safety (OHS) protocols, including:
 - Emergency prevention, preparedness, and response
 - Vehicular and traffic safety
 - Safe use of tools, machinery, and equipment
 - Working at heights and confined spaces
- Enforcement of a Code of Conduct, signed by all workers, addressing behavior on site, mutual respect, prohibition of child labor, and prevention of sexual exploitation, abuse, and harassment (SEA/SH).

- Ensuring diverse, inclusive, and respectful workplaces, with zero tolerance for discrimination or harassment.
- Responsibility for primary suppliers' compliance with labor and safety requirements, particularly in procurement of critical materials.
- Integration of all the above into training and induction programs for site workers, supervisors, and subcontractors.

The Contractor shall implement the following thematic mitigation measures:

8.1.1.1 Air Quality

Dust Prevention:

- > Maintain ambient particulate matter below 300 ppm (24hr mean) within 100 m of the site.
- > Apply water spraying, screening, and good housekeeping to suppress dust.
- > Workers shall use masks, gloves, and protective clothing.
- > Vehicles transporting materials shall be covered.
- > Extra precautions shall be taken near hospitals to protect patients and staff.

Vehicle Emissions Control:

- Select and operate vehicles/equipment that comply with emission standards (Official Gazette No. 30004, dated 11 March 2017).
- > Ensure regular maintenance and inspection of engines and exhaust systems.

8.1.1.2 Noise Management

- > Keep noise levels below 70 Leq (dB(A)) within 100 m of the site, per the Noise Regulation.
- > Use machinery with mufflers; limit work to approved hours.
- > For night works, obtain prior approval from local authorities and consult nearby residents.

8.1.1.3 Waste Management

Demolition Debris:

- Prepare and implement a demolition debris handling plan in line with the Debris Removal Regulation (OG No. 25406, 18 March 2004 and amendments OG No. 27533, 26 March 2010).
- > Obtain IMM approval. Store, transport, and dispose debris accordingly.

Hazardous Waste:

- Identify potentially hazardous waste and prepare a handling plan under the Waste Management Regulation (April 2015).
- > Coordinate with IMM for storage, transport, and disposal via licensed facilities.

Medical Waste:

- > Do not interfere with hospital medical waste plans.
- > Prevent worker contact with medical waste and ensure separation from other waste.

Asbestos Handling:

- > Confirm presence of asbestos with owner/manager.
- > Prepare a handling plan under the Asbestos Regulation (OG No. 28539, Jan 2013).
- > Dispose through licensed facilities (e.g. IZAYDAŞ).
- > Implement the plan during all works.

Transportation Management:

- > Coordinate with IMM Transportation Dept. to define routes for:
 - Demolition debris
 - Hazardous/asbestos waste
 - Construction materials
- > Cover truck dumpers to prevent spillage and avoid public disturbance.

8.1.1.4 Wastewater and Erosion Control

- > Provide discharge either to municipal sewer (if available) or via septic tanks.
- Take measures to prevent contamination of nearby watercourses from runoff or wastewater generated by construction activities.

8.1.1.5 Reporting Obligations

- > Contractor shall frequently update the Supervision Consultant on environmental compliance.
- Reports shall include:
 - Implementation of mitigation measures
 - Waste tracking documentation
 - o Incident logs
- > Environmental sections must be included in general progress reports submitted to IPCU.

8.1.2 Supervision Consultant's Responsibilities

The Supervision **Consultant** shall ensure full and proper implementation of mitigation measures by:

- Assigning a qualified Environmental Consultant in the team.
- Verifying compliance with ESMF and site-specific ESMPs.
- Coordinating with authorities including IMM, MoEUCC, and TAEK.
- Submitting monthly environmental monitoring reports to IPCU.
- Informing IPCU about any non-compliance or necessary corrective action.
- Proposing updates to the mitigation framework in case of legal or field changes.

8.1.3 IPCU's Responsibilities

As the lead implementing agency, **IPCU** holds overall responsibility for project-wide environmental and social performance.

Its key responsibilities include:

- > Ensuring integration of E&S requirements in tender documents.
- > Reviewing and validating reports submitted by the Supervision Consultant.
- > Conducting periodic site audits and inspections.
- > Coordinating with KfW and national stakeholders on E&S compliance.
- > Overseeing the functioning of the grievance mechanism.
- > Updating the ESMF based on changes in legislation or project scope.
8.1.4 Design Consultant's Responsibilities

The Design Consultant plays a critical role in ensuring that environmental and social considerations are fully integrated during the planning and design phase of subprojects. Early-stage integration of E&S measures helps reduce risks during implementation and supports compliance with KfW's Environmental and Social Policy (ESP) and national legislation.

The responsibilities of the Design Consultant include:

- Employing a qualified Environmental Engineer within the design team to lead environmental screening, ensure ESMF compliance, and support preparation of site-specific documentation.
- Conducting site-specific environmental and social screening using the standard checklist provided in Annex 5 and/or 9, to identify risks such as proximity to sensitive areas (e.g., cultural heritage zones, schools, hospitals), or exposure to natural hazards.
- Preparing site-specific Environmental and Social Management Plans (ESMPs), based on screening outcomes, in coordination with IPCU and relevant authorities. These ESMPs will form the operational environmental compliance reference during construction.
- Integrating all relevant mitigation measures into technical drawings and design documentation to ensure that planned infrastructure layout, material choices, and construction methods comply with the ESMF.
- Identifying legal and permitting obligations and ensuring that designs account for the requirements of institutions such as the Regional Cultural Heritage Councils, ISKI, or IMM.
- Supporting IPCU in stakeholder consultations by providing technical input on environmental and social mitigation strategies embedded in the design.
- Revising design documents, if necessary, based on feedback from the Supervision Consultant, IPCU, or stakeholder engagement processes.

The Design Consultant is responsible for ensuring that site-level risk management begins at the planning stage and that compliance pathways are clearly reflected in all design outputs.

9.0 MONITORING AND REPORTING

The Istanbul Project Coordination Unit (IPCU) is responsible for ensuring that all environmental and social (E&S) risks and impacts associated with the Project are appropriately monitored and addressed in a timely and effective manner.

Monitoring of both the Environmental and Social Management Framework (ESMF) and the subprojectlevel Environmental and Social Management Plans (ESMPs) is a core component of IPCU's implementation and oversight responsibilities.

9.1 Monitoring Responsibilities

- IPCU will coordinate and oversee regular monitoring of construction activities, with a focus on environmental performance, occupational health and safety, labor conditions, stakeholder engagement, and grievance resolution.
- Monitoring will be based on:
 - Site inspections by IPCU or delegated consultants
 - Monthly E&S reports submitted by Contractors and Supervision Consultants
 - Data collected through progress meetings, environmental logs, and community feedback
 - Grievance mechanism records and resolution status

9.2 Data Collection and Evaluation

- IPCU will collect and compile monitoring data using the standardized Monthly Activity Report Template (see Annex 7), which includes specific indicators on E&S compliance.
- Deviations or non-conformities identified during monitoring will trigger corrective actions, with deadlines and responsibilities recorded and followed up.

9.3 Reporting Structure

- Contractors will report on E&S issues through their Environmental Engineers as part of regular site reporting.
- Supervision Consultants will consolidate these reports and submit monthly environmental monitoring reports to IPCU, including findings, site observations, and any corrective measures initiated.
- IPCU will prepare internal summary reports and submit consolidated findings to KfW, as needed.

9.4 Monitoring and Mitigation Tables

To support implementation and oversight, this ESMF includes:

- **Table 1 Mitigation Plan**: Presents the environmental and social risks and mitigation measures identified during project design.
- **Table 2 Monitoring Plan**: Defines the monitoring indicators, frequency, responsibility, and verification methods for each E&S component.

Table 1 MITIGATION PLAN

Phase	Issue	Mitigating Measure	Cost	Institutional Responsibility
NSTRUCTION	 Air Quality Dust emissions; during retrofitting or demolition activities would be minor and temporary. Vehicle exhaust emissions; carbon monoxide (CO), nitrogen oxides (NO_x), Sulphur oxides (SO_x) and fugitive hydrocarbons. 	 Dust prevention measures and good housekeeping practices such as water spraying to prevent dust and use of curtains and screening of the construction area. Use of masks, work gloves and clothes by workers. All vehicles delivering dusty construction materials to the site or removing debris will be enclosed and covered to prevent release of dust. Selection and use of vehicles/engines with appropriate emission control technologies and equipment. Maintaining of all vehicles and equipment engines and exhaust systems in order not to breach Regulation limits set for that vehicle/equipment type and mode of operation. 	Criteria / specifications to be incorporated into bidding and contract documents. It is not considered as a separate cost item.	Supervision Consultant is responsible to monitor and supervise the activity. Contractor is responsible to execute the mitigation measure. Provincial Directorate of MoEUC , Police Department and Istanbul Metropolitan Municipality is responsible to supervise the activity
	 Noise Equipment and delivery vehicles used during retrofitting or demolition activities would generate noise. Temporary increases in noise levels along truck delivery routes would also occur. 	To ensure the use of noise control techniques on noisy equipment such as use of machines equipped with appropriate mufflers also located appropriately To ensure that noise emissions from the site do not result in accidence of Turkish threshold values. Operating times limited to normal working hours to be determined with due sensitivity to the citizens private life (such as, working on weekends near schools, hospitals, mosques, churches praying times) In the event of nighttime working, working hours will be discussed and agreed with the relevant authorities and after consultation with nearby communities. In case night operations are deemed necessary and the noise levels would be high, public will be informed 1 week in advance.	Criteria / specifications to be incorporated into bidding and contract documents. It is not considered as a separate cost item	Supervision Consultant is responsible to monitor and supervise the activity. Contractor is responsible to execute the mitigation measure. Provincial Directorate of MoEUC is responsible to supervise the activity. Istanbul Metropolitan Municipality is responsible to supervise the activity

• Transportation Use of trucks with covered dumpers: Optimal use of alternative roads to prevent disturbance to the visitor and residents. Criteria / specifications to in proported into lading and contrait documents. Contractor is responsible to implement the Messure responsible to monitor and specifications to its specifications to its specifications to its to monitor and specifications to its to monitor and specifications to its to monitor and specifications to its specifications to its specinits its its into contact documents. Its its it				•	
• Wase Management Retrofiting and demolition activities are one of the largest sources of wase. - Demolition Debris Handling - Prepare a plan for handling of Demolition Debris in accordance with the Regulation. - Frepare a plan for handling these wastes in accordance with the Plan. - Criteria / specifications to the and appendixe the activity. - Output of the Istambul Metropolitan Municipality. - Output of the Plan.		Transportation	Use of trucks with covered dumpers Optimal use of alternative roads to prevent disturbance to the visitors and residents.	Criteria / specifications to be incorporated into bidding and contract documents. It is not considered as a separate cost item	Contractor is responsible to implement the Measure Supervision Consultant is responsible to monitor and supervise the activity. Transportation Department of Istanbul Metropolitan Municipality to assist and supervise the Contractor.
	ISTRUCTION	 Waste Management Retrofitting and demolition activities are one of the largest sources of waste. Demolition Debris Handling Hazardous Waste Handling 	 Prepare a plan for handling of Demolition Debris in accordance with the Regulation. Get approval of the Istanbul Metropolitan Municipality. Provide storage, transportation and disposal activities in accordance with the Plan. Determine potentially hazardous waste to be handled during retrofitting in accordance with the Regulation and in consultation with the owner/management of the Public Building. Prepare a plan for handling these wastes in accordance with the Regulation and in consultation with Istanbul Metropolitan Municipality. Provide handling, storage, transportation and disposal/destruction activities in accordance with the Plan. 	Criteria / specifications to be incorporated into bidding and contract documents. It is not considered as a separate cost item. Criteria / specifications to be incorporated into bidding and contract documents. It is not considered as a separate cost item.	Supervision Consultant is responsible to monitor and supervise the activity. Contractor is responsible to implement the mitigation measure. Provincial Directorate of MoEUC is responsible to monitor and supervise the activity. Istanbul Metropolitan Municipality is responsible to assist the Contractor, approve the plan and supervise the implementation. Supervision Consultant is responsible to monitor and supervise the activity. Contractor is responsible to implement the mitigation measure. Istanbul Metropolitan Municipality is responsible to assist the Contractor, approve the Plan and supervise the Implementation.

	Handling Medical Wastes Relevant for retrofitting of hospitals	Hospital Management will make plans regarding the collection, storage, and disposal of medical wastes, and provide the necessary training for the staff in charge. Hospital management will take necessary measures for continuous management of medical wastes during retrofitting activities, if hospital services are continuing.	Criteria / specifications to be incorporated into bidding and contract documents. It is not considered as a separate cost item.	Hospital Management is responsible to prepare and execute the Mitigation Plan. Municipality is responsible for the ultimate disposal of medical wastes. Supervision Consultant is responsible to monitor and supervise the activity.
	Handling Asbestos Containing Material	Consult the owner/manager of the building for possible existing material containing asbestos (It is envisaged that design drawings and specification will provide input for this issue.) Prepare a Plan for handling the asbestos containing material in accordance with the Regulation. Make the necessary arrangements for ultimate disposal of asbestos containing materials in licensed hazardous waste disposal sites such as IZAYDAS. Execute mitigation measures during retrofitting activities in accordance with this Plan.	Criteria / specifications to be incorporated into bidding and contract documents. It is not considered as a separate cost item.	SupervisionConsultantisresponsibletomonitorandsupervise the activity.ContractorisresponsibletoContractorisresponsibletoimplementtheMitigationMeasure.MoEUC is responsible to approvethe handling plan and supervise itsimplementationIstanbulMetropolitanMunicipalityisresponsible tomonitorandsupervise theActivityKettivityKettivityKettivity
CONSTRUCTION	 Relevant for Retrofitting of Hospitals 	 Hospital Management in accordance with the "Accident and Emergency Plan" of the hospital will prepare a Radiation Safety Plan. Hospital will get approval of TAEK for this plan to be implemented during retrofitting activities. Execute mitigation activities in accordance with this plan. 	Criteria / specifications to be incorporated into bidding and contract documents. It is not considered as a separate cost item	Hospital Management is responsible to prepare and execute the Mitigation Plan. TAEK is responsible to direct, approve and supervise the execution of the plan. Design Consultant is responsible to monitor and supervise the activity.

• Workers health and safety All necksary protective equipment's fund has sidely below provided to the worker. Proper notification signs will be placed to maintain the security of the public and local people. Criteria / specifications to be incorporated into bidding and comparison of table taw numbered 4857 such as "Regulation on Using of Peoplement S at Work Places" will be followed. Criteria / specifications to be incorporated into bidding and comparison of table taw numbered 4857 such as "Regulation on Using of Peoplement S at Work Places" will be followed. Supervision Consultant is responsible to monitor and supervise the activity. • Public Safety Entrance of public to the construction site will be prevented using warning signs & lights, and barriers etc. Criteria / specifications to be incorporated into bidding and consultant is responsible to monitor and supervise the activity. Supervision Consultant is responsible to implement is the sective full be followed. • Public Safety Entrance of public to the construction site will be prevented using warning signs & lights, and barriers etc. Criteria / specifications to be incorporated into bidding and consultant is responsible to monitor and supervise the activity. • Uuban Renewal Projects with housing units more than 200. Client (Project Implementation Unit) needs to have an ElA report to be prepared. App. 50.000 USD/EIA Report. Relevant Implementation Unit to express the report. • Uuban Renewal Projects with housing units more than 200. Client (Project Implementation to approve the report. App. 50.000 USD/EIA Report. Relevant Implementation Unit to express the r				
Image: Second	 Workers health and safety 	 All necessary protective equipment's (hard hat, safety belt, protective clothes, gloves, glasses etc.) will be provided to the workers. Proper notification signs will be placed to maintain the security of the public and local people. The personal will be trained in "labor health and occupational safety" issues. 		
Public Safety Entrance of public to the construction site will be prevented using warning signs & lights, and barriers etc. Criteria / specifications to be incorporated into bidding and contract documents. It is not considered as a separate cost item Supervision Consultant is responsible to monitor and supervise the activity. * Urban Renewal Projects with housing units more than 200. Client (Project Implementation Unit) needs to have an EIA report to be prepared. Relevant Implementation Unit to prepared. Ministry of Environment and Urbanization to approve the report. Contractor to implement the measures. App. 50.000 USD/EIA Report. Relevant. Designer/contractor is responsible to approve the report. Contractor to implement the measures. It is not consultant is responsible to approve the report. Supervision Consultant is responsible to monitor and supervise the implementation Unit to prepared.		The related regulations of Labor Law numbered 4857 such as "Regulation on Occupational Health and Safety", "Regulation on Health and Safety at Construction Works" and "Regulation on Using of Personal Protective Equipment's at Work Places" will be followed.	Criteria / specifications to be incorporated into bidding and contract documents. It is not considered as a separate cost item	Supervision Consultant is responsible to monitor and supervise the activity. Contractor is responsible to implement the Mitigation Measure.
Image: Wrban Renewal Projects with housing units more than 200. Client (Project Implementation Unit) needs to have an EIA report to be prepared. Relevant Implementation Unit to prepare (or have it prepared) an EIA report. Image: Ministry of Environment and Urbanization to approve the report. Ministry of Environment and Urbanization to approve the report. Relevant Implementation Unit to prepare (or have it prepared) an EIA report. Image: Description of the report. MoEUC is responsible to approve the report. MoEUC is responsible to approve the report. Image: Description of the report. Designer/contractor is responsible to implement the measures. Designer/contractor is responsible to implement the measures.	* Public Safety	Entrance of public to the construction site will be prevented using warning signs & lights, and barriers etc.	Criteria / specifications to be incorporated into bidding and contract documents. It is not considered as a separate cost item	Supervision Consultant is responsible to monitor and supervise the activity. Contractor is responsible to implement the Mitigation Measure.
	Urban Renewal Projects with housing units more than 200.	Client (Project Implementation Unit) needs to have an EIA report to be prepared. Ministry of Environment and Urbanization to approve the report. Contractor to implement the measures.	App. 50.000 USD/EIA Report.	Relevant Implementation Unit to prepare (or have it prepared) an EIA report. MoEUC is responsible to approve the report. Designer/contractor is responsible to implement the measures. Istanbul Metropolitan Municipality to supervise the implementation

	Waste Water (Point/Non-Point) Handling	 To prevent any water pollution due to construction activities contractor will provide facilities for discharge of wastewater and/or spill erosion during construction; Either to city sewerage system (if available) directly, or Through septic tanks to be constructed in enough capacity, and periodically evacuated. Additional necessary precaution shall be taken to prevent the pollution of nearby water courses by the wastewater resulting from construction activities. 	Specifications to be incorporated into bidding and contract document. It is not considered as a separate cost item.	Supervision Consultant is responsible to monitor and supervise the activity. Contractor is responsible to implement the mitigation measure. ISKI (Istanbul Metropolitan Municipality Water and Sewerage Authority) to assist and supervise the activity.
	✤ Cultural Heritage	Consider relevant legal steps as mentioned in Section 4	No additional cost items.	As defined in the laws.
				IPCU to coordinate and define the status.
CTION				Relevant institutions to select the buildings accordingly
CONSTRU				Supervision Consultant is responsible to monitor and supervise the activity.
	Project Level Grievance Redress Mechanism	The IPCU is accessible to the public through all communication	No additional cost itoms	IPCIL is responsible for response and
			No additional cost items.	resolution of grievances.
				Contractor is responsible resolve issues if needed.
	 Workers Grievance Redress Mechanism 	Consultants are required to establish a Grievance Redress Mechanism for "Worker's pecuniary claim" the workforce during construction as specified in Clause 36 of the Labor Law. Regarding to this regulation, Consultants must announce the Contractor's interim	No additional cost items.	Supervision Consultant is responsible to monitor and supervise the activity.
		payment by posted on the boards and this announcement stays on the board for one month before the payment is done. Workers can also report their grievances directly to their Consultants and IPCU.		Contractor is responsible to implement the mitigation measure.

 Project Affected Peoples Mechanism (PPM) 			
	The PPM has been established by the Bank to provide an opportunity for an independent and impartial review of submissions from Project-affected people who believe they have been or are likely to be adversely affected by KFW's failure to implement its ESP in situations when their concerns cannot be addressed satisfactorily through the Project-level GRM or the processes of the Bank's Management	No additional cost items.	KFW is responsible for implementation of the PPM.
	For information on KFW's PPM, please visit: https://www.KFW.org/en/policies-strategies/operational- policies/policy-on-the-project-affected-mechanism.html		

Table 2 MONITORING PLAN

Phase	What parameter is to be monitored?	Where is the parameter to be monitored?	How is the parameter to be monitored type of monitoring equipment?	When is the parameter to be monitored frequency of measurement or continuous?	Why is the parameter to be monitored (optional)?	Cost	Responsibility
	Air Quality						
	Vehicle Exhaust Emissions	At the Construction Site	Portable Measurement Devices	At the Project Start	To assure compliance with the Regulation on Assessment and	Criteria / specifications to be incorporated into bidding and contract	Contractor is responsible to execute the Mitigation Measure.
	Duct	At the Construction Site	Visual	After all servicing vehicles Weekly	Management of Air Quality to mitigate any potential negative environmental	lt is not considered as a separate cost item.	Istanbul Municipality is responsible to supervise
	Dust	At the construction site	VISUAI		To provent any possible		Supervision Consultant is responsible to supervise.
		(In the case that during retrofitting hospitals still operate partially and dormitories are utilized at schools) At the operating parts of building.	Visual	Continuously	disturbance and adverse health effects on the residents.		
CONSTRUCTION							

Noise	Near the Construction Site	Portable Noise Meters	On Daily, Hourly Basis	To assure compliance with the Regulation on Assessment and Management of Ambient Noise to mitigate any potential negative environmental effects.		Contractor is responsible to execute the Mitigation Measure. Istanbul Metropolitan Municipality is responsible to supervise the Activity
NUISE	(In the case that during retrofitting hospitals still operate partially and dormitories are utilized at schools.) At operating parts of the building.	Auditory	Continuously	To prevent any possible disturbance and adverse health effects on the residents.	Criteria / specifications to be incorporated into bidding and contract documents. It is not considered as a separate cost item.	Supervision Consultant is responsible to supervise.

Phase	What parameter is to be monitored?	Where is the parameter to be monitored?	How is the parameter to be monitored type of monitoring equipment?	When is the parameter to be monitored frequency of measurement or continuous?	Why is the parameter to be monitored (optional)?	Cost	Responsibility
	 Collection of Solid Wastes Demolition Debris Handling 	At the Construction Site	In accordance with the plan be prepared.	In accordance with the plan be prepared and volume of debris.	To assure compliance with the Debris Removal Regulation		Supervision Consultant is responsible to monitor and supervise the activity. Contractor is responsible to implement the mitigation measure. Provincial Directorate of MoEF is responsible to monitor and supervise the activity.
CONSTRUCTION	Hazardous Waste Handling	At the Construction Site	In accordance with the plan to be prepared.	In accordance with the plan to be prepared.	To assure compliance with the Hazardous Waste Management Regulation to mitigate any potential negative environmental effects.	Criteria / specifications to be incorporated into bidding and contract documents. It is not considered as a separate cost item.	IstanbulMetropolitanMunicipality is responsible toassist the Contractor, approve theplanandsupervisetheimplementation.SupervisionConsultantSupervisionConsultantsupervise the activity.Contractoris responsible toimplementthemitigationmeasure.IstanbulMetropolitanMunicipality is responsible toassist the Contractor, approve thePlanandsupervisetheImplementation.
Phase	What parameter is to be monitored?	Where is the parameter to be monitored?	How is the parameter to be monitored type of monitoring equipment?	When is the parameter to be monitored frequency of measurement or continuous?	Why is the parameter to be monitored (optional)?	Cost	Responsibility

	Handling medical wastes	At the construction and disposal site	In accordance with the plan to be prepared	In accordance with the plan to be prepared.	To assure compliance with the Regulation for Medical Waste Management, to mitigate any potential negative effects.	Criteria / specifications to be incorporated into bidding and contract documents. It is not considered as a separate cost item.	HospitalManagementisresponsible for the preparation of the plan.Municipality is responsible for the transportation and disposal of wastes.SupervisionConsultantis responsible to monitor and supervise the activity.Contractoris responsible to implement the Mitigation Measure.MoEUCis responsible for the monitoring
	Handling Asbestos Containing Material	At the Construction and Disposal Site	In accordance with the plan to be prepared.	In accordance with the plan to be prepared.	To assure compliance with the Directive for Handling of Asbestos Products to mitigate any potential negative environmental effects	Criteria / specifications to be incorporated into bidding and contract documents. It is not considered as a separate cost item.	Supervision Consultant is responsible to monitor and supervise the activity. Contractor is responsible to implement the Mitigation Measure. MoEUC is responsible to approve the handling plan and supervise its implementation Istanbul Metropolitan Municipality is responsible to monitor and supervise the Activity
CONSTRUCTION	What parameter is to be monitored?	Where is the parameter to be monitored?	How is the parameter to be monitored type of monitoring equipment?	When is the parameter to be monitored frequency of measurement or continuous?	Why is the parameter to be monitored (optional)?	Cost	Responsibility

	Radiation	At the Construction and Disposal Site	In accordance with the plan be prepared.	In accordance with the plan to be prepared.	To assure compliance with the Directive for Radiation Safety to mitigate any potential negative environmental effects.	Criteria / specifications to be incorporated into bidding and contract documents. It is not considered as a separate cost item.	HospitalManagementisresponsibletoprepareandexecute the Mitigation Plan.TAEKisresponsibletodirect,approveandsuperviseapproveandsupervisetheexecution of the plan.SupervisionConsultantisresponsibletomonitorandsupervisetheactivity
	Waste Water Handling	Near and at the Construction Site	Observation	Continuous	To mitigate potential negative effects.	Criteria / specifications to be incorporated into bidding and contract documents. It is not considered as a separate cost item.	Supervision Consultant is responsible to monitor and supervise the activity. Contractor is responsible to implement the mitigation measure. ISKI (Istanbul Metropolitan Municipality Water and Sewerage Authority) to assist and supervise the activity.
	Workers health and safety	At the construction site	In accordance with the related regulations of Labor Law numbered 4857 such as "Regulation on Occupational Health and Safety", "Regulation on Health and Safety at Construction Works" and "Regulation on Using of Personal Protective Equipments at Work Places"	Continuous	To mitigate potential negative effects.	Criteria / specifications to be incorporated into bidding and contract documents. It is not considered as a separate cost item.	Supervision Consultant is responsible to monitor and supervise the activity. Contractor is responsible to implement the Mitigation Measure.
CONSTRUCTION	What parameter is to be monitored?	Where is the parameter to be monitored?	How is the parameter to be monitored type of monitoring equipment?	When is the parameter to be monitored frequency of measurement or continuous?	Why is the parameter to be monitored (optional)?	Cost	Responsibility

	Public safety	At and near the construction site	Observation	Continuous	To mitigate potentia negative effects	Criteria / specifications to be incorporated into bidding and contract documents. It is not considered as a separate cost item.	Supervision Consultant is responsible to monitor and supervise the activity. Contractor is responsible to implement the Mitigation Measure.
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ANNEXES

ANNEX 1 The National Standards for Permissible Ambient Pollutant Concentrations

Table 1: Levels of Pollutants in Ambient Air as Given in Turkish Regulation on Assessment andManagement of Air Quality

Pollutant	Average Duration	Limit Value for	Target Value (after
		Transition Period	1.1.2019)
		(2009-2014)	
SO ₂	1 hr	900 μg/m ³	
	24 hr	400 μg/m ³	250 μg/m³
	Winter period	250 μg/m ³	125 μg/m³
	Annual mean	150 μg/m³	
NO ₂	24 hr	300 μg/m ³	
	Annual mean	100 μg/m³	60 μg/m³
Particulate matter	24 hr	300 μg/m ³	100 μg/m³
	Winter period	200 μg/m ³	90 μg/m ³
	Annual mean	150 μg/m³	60 μg/m ³
СО	24 hr	30 μg/m³	10 μg/m ³
	Annual mean	10 μg/m³	
Pb	Annual mean	2 μg/m³	1 μg/m³
NO ₂	1 hr	200 µg/m ³ (18 times	100 μg/m³
		a year)	
	Annual	40 μg/m ³	20 μg/m ³
NOx	Annual	30 μg/m ³	
Benzene	Annual	5 μg/m ³	5 μg/m ³

ANNEX 2 The Applicable Ambient Noise Limits

Table II.a Turkish Ambient Noise Standards for Construction Activities

Type of Activity (construction, demolishing, repair work)	L _{daytime} (dBA)
Building	70
Road construction	75
Other sources	70

Table II.b Turkish Standards for Ambient Vibration Created in Construction Sites

	Max. Allowable Vibration (mm/sec)			
	Continuous vibration Intermittent vibration			
In residential areas	5	10		
In industrial and trade	trade 15 30			
zones				

a. **Table II.c** Noise Levels in Inside Receiving Media given in Turkish Noise Management Regulation

Uses		Closed Window L _{eq}	Open window
	1	(dBA)	L _{eq} (dBA)
Cultural Facilities	Theatre, movie	30	40
	theatre, conference		
	nalis		
	Concert halls	25	35
Health Facilities	Hospitals, polyclinics, elderly	35	45
	nouses		
	Treatment rooms	25	35
Education facilities	Classrooms, private educational centers, kindergarten, laboratory etc.	35	45
	Sport center	55	65
	Cafeteria	45	55
	Bedroom at kindergarten	30	40
Touristic facilities	Rooms in hotels, motels, restaurant at hotels	35	45
Archeological sites	Archeological, natural, urban, historical etc.	55	65

Uses		Closed Window Leq	Open window
		(dBA)	L _{eq} (dBA)
Commercial facilities	grand offices	45	55
	Meeting rooms	35	45
	Grand typewriter or computer rooms	50	60
	Game rooms	60	70
	Private operative offices	45	55
	General offices (calculation, writing divisions)	50	60
	Work centers, shops etc.	60	70
	Commercial storage	60	70
	Restaurants	45	55
Public Institutions	Offices, labs	45	55
	Meeting Rooms	35	45
	Computer rooms	50	60
Sports Area	Sport Centers, swimming pools	55	65
Residential buildings	Bedrooms	35	45
	Livingroom's	45	55

Table II.d Standards for Ambient Noise

(According to the Turkish Regulation on Evaluation and Management of Environmental Noise)

Environmental Noise Limit Values for the Construction Site

Туре	of	activity	(construction,	L _{daily-time} (dBA)
demoli	tion a	nd repairm	ent)	
Building	3			70
Road				75
Other r	esour	ces		70

ANNEX 3 Exclusion List of KfW Group¹

I. Exclusions

In the following areas KfW Group does not offer financing for new projects or purposes:2

- 1. Production or trade in any product or activity subject to national or international phase-out or prohibition regulations or to an international ban, for example
 - i. certain pharmaceuticals, pesticides, herbicides and other toxic substances (under the Rotterdam Convention, Stockholm Convention and WHO "Pharmaceuticals: Restrictions in Use and Availability"),
 - ii. ozone depleting substances (under the Montreal Protocol),
 - iii. protected wildlife or wildlife products (under CITES / Washington Convention),
 - iv. prohibited transboundary trade in waste (under the Basel Convention).
- **2.** Investments which could be associated with the destruction3 or significant impairment of areas particularly worthy of protection (without adequate compensation in accordance with international standards).
- **3.** Production or trade in controversial weapons or critical components thereof (nuclear weapons and radioactive ammunition, biological and chemical weapons of mass destruction, cluster bombs, anti-personnel mines, enriched uranium).
- **4.** Production or trade in radioactive material. This does not apply to the procurement of medical equipment, quality control equipment or other application for which the radioactive source is insignificant and/or adequately shielded.
- 5. Production or trade in unbound asbestos. This does not apply to the purchase or use of cement linings with bound asbestos and an asbestos content of less than 20%.
- **6.** Destructive fishing methods or drift net fishing in the marine environment using nets more than 2.5 km.
- **7.** Nuclear power plants (apart from measures that reduce environmental hazards of existing assets) and mines with uranium as an essential source of extraction.
- **8.** Prospection, exploration and mining extraction of coal; the production of gas by carbonization of coal, transport and storage infrastructure essentially used for coal; power plants, heating stations and cogeneration facilities fired with coal, as well as associated stub lines.4

¹ Version 2, published on 14 December 2023, Exclusion List and Supplementary Requirements | KfW

² Deviations can result from mandated transactions (Zuweisungsgeschäft) in accordance with § 2 (4) of the Law Concerning KfW, or from instructions of the relevant federal ministries.

^{3 &}quot;Destruction" means (i) the destruction or severe deterioration of the integrity of an area caused by a major and prolonged change in the use of land or water, or (ii) the alteration of a habitat which leads to the inability of the affected area to perform its function.

⁴ Investments in power transmission grids with significant coal-based power feed-in will only be pursued in countries and regions with an ambitious national climate protection policy or

- **9.** Prospection, exploration and extraction of oil (upstream), transport and storage infrastructure for crude oil, oil terminals and oil harbors as well as refineries.5^{,6}
- **10.** Prospection, exploration and extraction of natural gas (upstream), new construction of natural gas grids and pipelines, vessels for the laying of natural gas pipelines, LNG liquefying terminals as well as production facilities for grey hydrogen (steam reforming of fossil fuels, without the use of CCS).5[.] 7

II. Supplementary Requirements

In selected sectors, KfW Group ties its direct financial commitment for concrete new projects to the following qualitative conditions: ¹

- 1. Outside the EU and the OECD high income countries, large agricultural or forestry enterprises producing palm oil or wood must either comply with recognized international certification systems (RSPO or FSC) or equivalent regulations to ensure sustainable cultivation conditions or must be in the process of achieving compliance.
- **2.** Large dam and hydropower projects use the recommendations of the World Commission on Dams (WCD) as orientation.8

strategy (NDC), or where the investments are targeted at reducing the share of coal-based power in the relevant grid.

⁵ The exclusion does not apply to refineries for bio-based products. In the case of refineries for predominant material use, investments in site concentrations (without net extension) and in the prolongation of the technical lifetime are not excluded. Reprocessing (rerefining) and energetic use of waste oil are still eligible for financing

⁶ Measures for the reduction of greenhouse gas emissions or for increase of efficiency are generally eligible for financing provided that they do not take place in the prospection, exploration and extraction of oil and gas (upstream) and do not result in capacity extensions of more than 10%. Financing of carbon capture and storage is also eligible for financing.

⁷ The exclusion of new construction of natural gas grids and pipelines does not include gas grids and pipelines for cooking purposes.

In accordance with the German government's sector guidelines for export credit guarantees (Section Energy, Fossil energy sources: natural gas), further projects to develop new natural gas projects, as well as transport and storage facilities can be financed in special individual cases (after conducting an evidence-based review) until the end of 2025. Criteria to be met are the need for national security or geostrategic supply security interests, as well as compatibility with the 1.5-degree target and the ensurance of the avoidance of lock in effects.

⁸ Dams with a height of at least 15 meters measured from the foundation or dams with a height between 5 and 15 meters with a reservoir volume of more than 3 million cubic meters.

ANNEX 4 Regional Council for the Preservation of Cultural & Natural Assets Lists

	SITE DECISION	PLAN DECISION
FATİH	With the 12.1995 dated, no.	No Conservation Plan
	6848 Decision: Urban and	Transition period construction conditions
	Historical Site	determined with the 2.8.1995 dated, No. 6898
		Decision.
EMİNÖNÜ	With the 12.7.1995 dated	No Conservation Plan
	and no. 6848 Decision:	Transition period construction conditions
	*Grade 1 Archeological Site	determined with the 2.8.1995 dated, no. 6898
	*Urban and Archeological	Decision.
	Site	
	*Urban and Historical Site	
BEYOĞLU	With the 7.7.1993 dated and	No Conservation Plan
	No. 4720 Decision:	Transition period construction conditions
	*Urban Site	determined with the 29.9.1993 dated, no. 4954
	With the 22.3.1995 dated	Decision.
	and No. 6482 Decision:	
	*Historical Site (Docks)	
	The Atatürk Culture Center	
	(AKM) Protection Site	
EYUP	With the 15.1.1977 dated	Approved with 18.11.1978 dated and No. 10741
	and No. 9591 Decision:	Decision, in 1/500 scale:
	*Urban Site	*Eyüp Conservation Implementation Plan
		Approved with 7.10.1992 dated and No.4095
		Decision:
		*Eyup Mosque and Center, their environs
		Conservation Implementation Plan
		h Approved with 2 3 1994 dated and No.
		5387 Decision:
		*Included in the Site Plan:
ΒΑΚΙΒΚΟΥ	No site decision	Approved with the 27.6 1990 and No. 1869
		Decision
		*Yesilköv 'Village' Conservation Plan
	With 1.9.1999 dated and No.	No Conservation Plan
	11103 Decision:	
	*Grade 2 Natural Site	
	(Florya Atatürk Forest)	
ŞİŞLİ	No Site.	
ZEYTİNBURNU	With 1.9.1999 dated and No.	
	12850 Decision:	
	*City Walls Buffer Zone Site	
GÜNGÖREN	No Site	
ESENLER	No Site	
BAĞCILAR	No Site	
BAHÇELİEVLER	No Site	
KAĞITHANE	No Site	

No: 1 List of Territories and Sites within the Task Area

GÖKTÜRK	No Site	
DISTICT		

No: 2 List of Territories and Sites within the Task Area

A. Archaeological Sites

- 1. Maltepe, Başıbüyük, Mağarabayır & Fındıkbayır Tepe; declared as: 1. degree Archaeological Site issue date/no of declaration: 29.11.1994/3616-3617
- 2. Pendik, Kaynarca, Pendik Mound declared as: 1. & 2. degree Archaeological Site issue date/no of declaration: 06.041993/3054
- 3. Samandıra, Remains of the Damatrys Palace & Bath Ruins declared as: 1. degree Archaeological Site issue date/no of declaration: 26.07.1996/4226
- Silivri, Center, Necropolis Zone declared as: 3. degree Archaeological Site issue date/no of declaration: 18.09.1997/4593
- 5. Silivri, Mimar Sinan Bridge and surroundings declared as: 1. degree Archaeological Site issue date/no of declaration: 21.03.2002/6311
- 6. Çatalca, İnceğiz Village, Necropolis of Maltepe declared as: 1. degree Archaeological Site issue date/no of declaration: 10.05.1994/3456

7. Silivri, Anastasius Walls

registered zone: 50 m band flanking the Walls as shown on sheets 20 J-I; 20 J-II; 21 J-III; 21 J-IV declared as: 1. degree Archaeological Site issue date/no of declaration: 06.04.2000/5558 (including areas previously declared as 1. degree Archaeological Site on 04.12.96/4335 and areas previously declared as 3. degree Archaeological Site on 25.11.99/5409, is changed as 1. degree Archaeological Site)

- Çatalca, Anastasius Walls declared as: 1. degree Archaeological Site issue date/no of declaration: 24.11.1995/39928 (previous declaration on 12.11.1977/10139)
- Küçükçekmece, Altınşehir, Ispartatakule- Firuzköy-Kayabaşı Area declared as: 1. degree Archaeological Site issue date/no of declaration: 10.07.1991/2700

10. Rhegion Site declared as: 1. & 2. degree Archaeological Site issue date/ no of declaration: 15.09.1973/3212

issue date/no of Conservation Implementation Plan: 28.09.1993/3212

- Küçükçekmece, Town Center declared as: 3. degree Archaeological Site issue date/no of declaration: 01.03.1994/3387
- Küçükçekmece, Yarımburgaz Cave, Baruthane & Resneli Osman Farm Location declared as: 1. degree Archaeological Site issue date/no of declaration: 1607.1991/2700
- Şile-Domalı (Sahilköy), Göztepe Location declared as: 1. degree Archaeological Site issue date/no of declaration: 07.02.2001/5950-28.06.2001/6098
- 14. Silivri-Kurfallı Village declared as: 1. degree Archaeological Site issue date/no of declaration: 16.01.2002/6254
- Pendik-Kurna Village, Tepecik Tepe Location, Tumulus as marked on sheet19, parcel 742 declared as: 1. degree Archaeological Site issue date/no of declaration: 06.11.2002/6484
- Silivri, Selimpaşa District, Selimpaşa Mound as marked on sheets 20-21-22-23, parcels 1429-1437-1432 declared as: 1. degree Archaeological Site issue date/no of declaration: 07.04.2004/6920

B. Urban Sites

- 1. Maltepe Fishermen's Village issue date/no of Urban Site declaration: 26.03.1991/2640 issue date/no of Conservation Implementation Plan: 23.01.1997/4377
- 2. Kartal, Town Center issue date/no of Urban Site declaration: 10.04.1997/4469
- Silivri, Ancient Selymbria, Town Center issue date/no of Urban Site declaration: 28.09.1993/3216
- Silivri, Selimpaşa issue date/no of Urban Site declaration: 10.12.1991/2773 issue date/no of Conservation Implementation Plan: 21.07.1992/2902
- Kadıköy, Traditional Market Area issue date/ no of Urban Site declaration:13.09.1991/3623 issue date/no of Conservation Implementation Plan: 13.05.1993/5802
- 6. Kadıköy, İbrahimağa issue date/no of Urban Site declaration: 21.03.1995/3721

issue date/no of Conservation Implementation Plan: 11.06.1998/4841

7. Kadıköy, Rasimpaşa

issue date/no of Urban Site declaration: 19.04.1994/3436 issue date/no of Conservation Implementation Plan: 12.12.1996/4344 revision to the Conservation Implementation Plan: 05.061998/4840

8. Çatalca, Kaleiçi (Citadel) District

issue date/no of Urban Site declaration: 14.11.1995/1566 issue date/no Conservation Implementation Plan: 14.11.1995/1566

C. Natural Sites

 Tuzla, Büyük & Küçük İçmeler declared as: Natural Site issue date/no of declaration: 14.01.1992/2787 revised as: 1.& 2. degree Natural Site issue date/no of declaration: 30.09.1999/5316

Büyük İçmeler

- 1. degree Natural Site: Sheet 21, parcels 3749
- 2. degree Natural Site: sheet21, parcels 3749, 4106, 4108, 4103 and 4107

Küçük İçmeler

- 1. degree Natural Site: Sheet 21, parcels 1429 and 1391
- 2. degree Natural Site: sheet21, rest of parcels 1429 and 1391
- Tuzla, Areas North of Büyük İçmeler declared as: 3. degree Natural Site; sheet 21, parcels 37790, 1405, 3789, partially 1409 and 1413 issue date/no of declaration: 30.09.1999/5317
- Tuzla, Kamil Abduş Lake and Environs declared as: 1. & 2. degree Natural Site issue date/no of declaration: 26.01.1993/3019-16.07.1997/4535 issue date/no of Conservation Implementation Plan 1/5000:16.07.1997/4535
- Silivri, Büyük ve Küçük Kokmuş Lakes declared as: 1. & 2. degree Natural Site issue date/no of declaration: 14.10.1999/5349
- 5. Kartal, Dragos Hill and Vicinity declared as: 1., 2. & 3. degree Natural Site issue date/no of declaration: 11.11. 1999/5385
- Kadıköy, block 309, parcel 2 issue date/no of declaration:20.12 1975/8781
- 7. Pendik, sheet 93, block 673, parcels 1, 2, 3, 4, 5 and 6; block 868, parcel 2; block 775, parcels 1, 2, 3. declared as: 1. degree Natural Site

issue date/no of declaration: 07.10.1999/5346

- Kadıköy, sheet 106, block380, parcels1-6 declared as: Natural Site issue date/no of declaration: 20.10.1979/11458
- Kadıköy, block 1149, parcel 8 declared as: 3. degree Natural Site issue date/no of declaration: 27.04.2000/5589
- Kadıköy, sheet 172, block 620, parcel 39 declared as: Natural Site issue date/no of declaration: 13.05.1977/9780 revised as: 3. degree Natural Site as of 27.06.2002/6397
- Küçükçekmece and Avcılar Interior & Exterior Sandbanks and Soğuksu Farm declared as: Natural Site issue date/no of declaration: 13.11.1976/9509 issue date/no of Küçükçekmece Conservation Implementation Plan: 28.09.1993/3212 issue date/no of Avcılar Conservation Implementation Plan: 04.09.1997/4566
- Kartal-Yakacık, sheets 109/2, parcel 7; sheet 109, block 2576, parcel 2 DDY Hospital (Hospital of State Railways) declared as: 2. degree Natural Site issue date/no of declaration: 26.09.2002/6451
- Kadıköy-Acıbadem, block 1340, parcels 4, 5, 6 declared as: 3. degree Natural Site issue date/no of declaration:16.10.2002/6470
- Kadıköy, sheet 9, block 5, parcel 1, Yoğurtçu Green Park declared as: 1. degree Natural Site issue date/no of declaration: 25.12.2002/6529
- Aydos Mountain falling into the territory of Pendik-Kartal-Sultanbeyli Provinces declared as: 1. degree Natural Site issue date/no of declaration: 14.10.1999/5348; 16.06.2000/5670

D. Combined Sites

- 1. Tuzla, Sakız Island, parcel 4709 declared as: 1. degree Archaeological & Natural Site issue date/no of declaration:17.11.1992/2972-26.01.1993/3019
- 2. Tuzla, İncirli (Glykeria) Islandsheet 39, parcels 2417, 2418 declared as: Archaeological & Natural Site

issue date/no of declaration: 27.12.1994/3642

3. Tuzla, Town Center

declared as: Urban Site & 3. degree Archaeological Site issue date/no of declaration: 23.02.1993/3022-16.04.1998/4762 Conservation Implementation Plan is underway

4. Şile, Town Center

declared as: Urban & Natural Site issue date/no of declaration: 28.01.1992/2796 (including Urban Site, Natural Site & Impact Zone Conservation Implementation Plan) issue date/no Urban Site Conservation Implementation Plan: 02.09.1992/2934 Revision for the Natural Site & Impact Zone: 03.05.1994/3453 Revision for the Natural Site & Impact Zone: 12.04.2001/6001

- Şile, Doğancılı and Alacalı declared as: 1. degree Natural Site & 1. and 2. degree Archaeological Site issue date/no of declaration:11.12.1997/4667
- Bayrampaşa, Ferhatpaşa Farm declared as: 1. degree Natural Site & 2. degree Archaeological Site issue date/no of declaration: 19.11.1994/3603-02.02.1996/4025
- Tuzla, Ancient Pier & Surroundings declared as: 1. degree Archaeological & Natural Site issue date/no of declaration: 16.041998/4761
- Çatalca, İkigöz and Kocakuyu Caves declared as: 1. degree Archaeological & Natural Site issue date/no of declaration: 24.11.1995/3928
- Çatalca, İnceğiz Village, Umurtepe Location declared as: 1. degree Natural Site & 2. degree Archaeological Site issue date/no of declaration: 21.08.1997/4540-05.02.1998/4701
- Kadıköy, Hasanpaşa declared as: Urban Site & 1. degree Natural Site issue date/no of declaration: 19.04.1994/3437 issue date/no of Conservation Implementation Plan: 11.06.1998/4841
- Şile, Ağva District declared as: 1. degree Archaeological & Natural Site issue date/no of declaration: 13.04.2001/5572
- Keçikalesi remains located on the Sultanbeyli side of the Aydos Mountain falling into the territory of Pendik-Kartal-Sultanbeyli Provinces declared as: 1. degree Archaeological & Natural Site issue date/no of declaration: 16.06.2000/5670

No: 4.3.1 List of Territories and Sites within the Task Area

NATURAL SITE		
Northern Side of Istanbul, the	Sarıyer and Beykoz (Partially)	15.11.1995/7755
Black Sea Belt Natural Site	Çavuşköy and Bahçeköy	
	Districts	
Abbasağa Park Natural Site	Beşiktaş	01.03.2000/11484
Validebağ Natural Site	Üsküdar	12.03.1977/9728
Reşitpaşa	Sariyer (Within the Bosporus	
	Site)	
NATURAL AND HISTORICAL SIT	E	
Bosphorus	Beşiktaş, Üsküdar, Sarıyer,	14.12.1974/8172
Natural and Historical Site	Beykoz (Partially)	
Yıldız Palace	Beşiktaş	09.02.1995/7296
Natural and Historical Site		
Ihlamur Kiosk and its Environs	Beşiktaş	13.02.1976/8913
Natural and Historical Site		
		11.06.1985/1152
Karacaahmet Cemetery	Üsküdar	03.05.1991/3180
Natural and Historical Site		
NATURAL AND URBAN SITE		
Büyük and Küçük Çamlıca	Üsküdar	11.01.1991/2759
Natural and Urban Sites		16.01.1998/9665
Marmara Islands	Büyükada, Heybeliada,	31.03.1984/234
Natural and Urban Sites	Burgazada, Kınalıada, Sedef	
	Adası	
URBAN SITE		
Ortaköy Mosque and its	Beşiktaş	25.07.1986/2447
Environs		
Urban Site		
Valide-i Atik Mosque and its	Üsküdar	02.04.1992/4482
Environs		
Urban Site		
Rum-i Mehmet Paşa Mosque	Üsküdar	22.08.1996/8587
and its Environs, and Ayazma		
Mosque and its environs		
Urban Site		

No: 4.3.2 List of Territories and Sites within the Task Area and the Responsibility of Istanbul

BEŞİKTAŞ

PROVINCE- SUBPROVINCE- LOCATION	SITE TYPE	REGISTRATION NUMBER-DATE	TRANSITION PERIOD CONSTRUCTION DECISIONS DATE-NO	COUNCIL APPROVAL DECISIONS DATE-NO	MUNICIPALITY APPROVAL DECISIONS DATE-NO	APPLICATION
İstanbul-Beşiktaş- Front View Area	Bosporus Site Zone, Front View Area: Natural and Historical Site	14.12.1974-8172		24.06.1983-15175 (In 1/5000 and 1/1000 scales)	1/5000: 22.07.1983 1/1000: 22.07.1983	PLAN
İstanbul-Beşiktaş- Rear View Area	Bosporus Site Zone, Rear View Area: Natural and Historical Site	14.12.1974-8172		20.05.1993-5813 (In 1/5000 scale) 23.12.1993-6297 (In 1/1000 scale)	1/5000: 18.06.1993 1/1000: 10.12.1993	PLAN
İstanbul-Beşiktaş- Ortaköy Mosque and Environs	Ortaköy Mosque and Environs: Urban Site Zone	25.07.1986-2447		23.01.1987-3164 (In 1/500 scale)	1/5000 (Ortaköy-	PLAN
İstanbul-Beşiktaş Yıldız Palace	Yıldız Palace: Natural and Historical Site Zone	09.02.1995-7296			Balmumcu) Decision to Halt the Implementation)	PLAN
İstanbul-Beşiktaş Abbasağa Park	Abbasağa Park: Natural Site Zone	01.03.2000-11484			*	COUNCIL OPINION
İstanbul-Beşiktaş	Ihlamur Kiosk:	13.02.1976-8913				COUNCIL OPINION
Ihlamur Kiosk and Environs	Natural and Historical Site Zone	11.06.1985-1152				COUNCIL OPINION
İstanbul-Beşiktaş						

ÜSKÜDAR

PROVINCE- SUBPROVINCE- LOCATION	SITE TYPE	REGISTRATION NUMBER-DATE	TRANSITION PERIOD CONSTRUCTION DECISIONS DATE-NO	COUNCIL APPROVAL DECISIONS DATE-NO	MUNICIPALITY APPROVAL DECISIONS DATE-NO	APPLICATION
İstanbul-Üsküdar- Front View Area	Bosporus Site Zone, Front View Area: Natural and Historical Site	14.12.1974-8172		24.06.1983-15175 (In 1/5000 and 1/1000 scales)	1/5000: 22.07.1983 1/1000: 22.07.1983	PLAN
İstanbul- Üsküdar - Rear View Area	Bosporus Site Zone, Rear View Area: Natural and Historical Site	14.12.1974-8172		17.09.1992-5144 (In 1/5000 and 1/1000 scales)	1/5000: 17.11.1992 1/1000:17.11.1992	PLAN
İstanbul- Üsküdar – Büyük ve Küçük Çamlıca	Büyük ve Küçük Çamlıca: Natural and Urban Site Zone	11.01.1991-2759 16.01.1998-9665				
İstanbul- Üsküdar- Valide-i Atik Mosque and Environs	Valide-i Atik Mosque and Environs: Urban Site Zone	02.04.1992-4462	16.01.1998-9665 07.05.2002-12886	16.04.1997-9264 (In 1/1000 scale)	1/1000:10.07.1998	PLAN
İstanbul- Üsküdar- Rum-i Mehmet Mosque and Environs Ayazma Mosque and Environs	Rum-i Mehmet Mosque and Environs Ayazma Mosque and Environs: Urban Site Zone	22.08.1996-8587			1/1000:14.08.1998	PLAN
İstanbul- Üsküdar- Harem, Salacak ve Şemsi Paşa	Harem, Salacak ve Şemsi Paşa: Natural Site Zone	12.03.1977-9728				
İstanbul- Üsküdar- Karacaahmet Mezarlığı	Karacaahmet Mezarlığı: Natural and Historical Site Zone	03.05.1991-3180				
İstanbul-Üsküdar- Validebağ	Validebağ: Grade 1 Natural Site Zone	16.07.11088				

BEYKOZ

PROVINCE- SUBPROVINCE- LOCATION	SITE TYPE	REGISTRATION NUMBER-DATE	TRANSITION PERIOD CONSTRUCTION DECISIONS DATE-NO	COUNCIL APPROVAL DECISIONS DATE-NO	MUNICIPALITY APPROVAL DECISIONS DATE-NO	APPLICATION
İstanbul- Beykoz: Front View Area	Bosporus Site Zone, Front View Area: Natural and Historical Site	14.12.1974-8172		24.06.1983-15175 (In 1/5000 and 1/1000 scales)	1/5000: 22.07.1983 1/1000: 22.07.1983	PLAN
İstanbul- Beykoz - Rear View Area	Bosporus Site Zone, Rear View Area: Natural and Historical Site	14.12.1974-8172		21.11.1991-3905 (In 1/5000 scale and 1/1000 scale)	1/5000: 13.09.1991 1/1000:13.09.1991	PLAN
İstanbul- Beykoz - Partial	İstanbul Northern Part-Black Sea Belt: Natural Site Zone	15.11.1995-7755		21.11.2001-12602 (In 1/5000 scale) 14.10.2003-14079 (In 1/1000 scale)	1/5000: 14.05.2002 1/1000:15.06.2004	PLAN
İstanbul- Beykoz- Partial	İstanbul Northern Part-Black Sea Belt: Natural Site Zone	15.11.1995-7755	14.12.1995-7809 06.06.1996-8287 05.05.1998-9936 20.08.1996-8409	With the 21.11.2001 dated, No: 12601, information and documents are requested.		
İstanbul- Beykoz- Riva	İstanbul Northern Part-Black Sea Belt: Natural Site Zone	15.11.1995-7755		12.08.1998-10254 (In 1/5000 scale) 12.08.1998-10255 05.12.2000-11992 17.10.2000-11873 (In 1/1000 scale- in parts)	(Governorship Approval) 1/5000:22.10.1998 1/1000:10.04.2001 29.09.2001	PLAN
İstanbul- Beykoz - Polonezköy (Natural Park)	İstanbul Northern Part-Black Sea Belt: Natural Site Zone	15.11.1995-7755		29.04.2003-13647 (1/10000)		PLAN AND COUNCIL OPINION

İstanbul- Beykoz-	İstanbul Northern	15.11.1995-7755	14.12.1995-7809	1/5000: Under the	
Çavuşbaşı District	Part-Black Sea Belt:		06.06.1996-8287	inspection of the	
	Natural Site Zone		05.05.1998-9936	Directorship	

SARIYER

PROVINCE- SUBPROVINCE- LOCATION	SITE TYPE	REGISTRATION NUMBER-DATE	TRANSITION PERIOD CONSTRUCTION DECISIONS DATE- NO	COUNCIL APPROVAL DECISIONS DATE-NO	MUNICIPALITY APPROVAL DECISIONS DATE-NO	APPLICATION
İstanbul-Sarıyer -	Bosporus Site Zone,	14.12.1974-8172		24.06.1983-15175	1/5000: 22.07.1983	PLAN
Front View Area	Front View Area:			(In 1/5000 and	1/1000:	
	Natural and			1/1000 scales)	22.07.1983	
	Historical Site					
İstanbul- Sarıyer -	Bosporus Site Zone,	14.12.1974-8172		21.04.1999-10884	1/5000: 25.06.1999	PLAN
Rear View Area	Rear			(In 1/5000 scale)	1/1000:	
	View Area:			26.02.2002-12772	Not approved	
	Natural and			(In 1/1000 scale)		
	Historical Site Zone					
İstanbul- Sarıyer -	İstanbul Northern	15.11.1995-7755	11.03.2003-13555			
Partial	Part-Black Sea Belt:		20.06.1996-8375			
	Natural Site Zone		02.04.2002-12839			
İstanbul- Sarıyer	İstanbul Northern	15.11.1995-7755	05.09.2000-11805			
Kilyos	Part-Black Sea Belt:		02.04.2002-12839			
	Natural Site Zone		04.08.2002-12952			

PROVINCE- SUBPROVINCE- LOCATION	SITE TYPE	REGISTRATION NUMBER-DATE	TRANSITION PERIOD CONSTRUCTION DECISIONS DATE-NO	COUNCIL APPROVAL DECISIONS DATE-NO	MUNICIPALITY APPROVAL DECISIONS DATE-NO	APPLICATION
İstanbul- Sarıyer- Zekeriyaköy and Uskumruköy	İstanbul Northern Part-Black Sea Belt: Natural Site Zone	15.11.1995-7755		09.10.2002- 13218 28.07.2003- 13933(1/1000)	1/5000: 21.01.2003 1/1000:20.10.2003	PLAN
İstanbul- Sarıyer- Bahçeköy District	İstanbul Northern Part-Black Sea Belt: Natural Site Zone	15.11.1995-7755	14.12.1995-7809 06.06.1996-8288 20.06.1998-8410 20.05.2003-13711			

ADALAR

PROVINCE- SUBPROVINCE- LOCATION	SITE TYPE	REGISTRATION NUMBER-DATE	TRANSITION PERIOD CONSTRUCTION DECISIONS DATE- NO	COUNCIL APPROVAL DECISIONS DATE-NO	MUNICIPALITY APPROVAL DECISIONS DATE-NO	APPLICATION
İstanbul-Adalar (All)	Marmara Islands:	31.03.1984-234	16.05.1984-291	25.06.1992-4832	1/5000: 30.06.1994	PLAN
	Natural and Urban		17.10.1985-1515	(In 1/5000 scale)		
	Site					
			11.02.1998-9775			
			30.09.1998-10432			

This is a summary of the Law No: 2863, revised as Delegated Legislation / 703 valid as of 2nd July 2018 providing an outline of the overall text and more detailed précis or full translations of the relevant articles. The final part of the law that comprises of the articles that are no longer affect and explanatory addendums incorporated over time into the full-text of the law are omitted, except for Annex 2, which is relevant for this project.

Law No: 2863 (Different from the No: 5226 Law on the Preservation of Cultural and Natural Assets and the Law for Making Changes in Various Law) Law on the Preservation of Cultural and Natural Assets No: 2863 Date of Approval: 21/7/1983

c. Date and number of the Official Gazette, in which this law is printed: 23/7/1983, 18113
Law No: 5226
Law on the Preservation of Cultural and Natural Assets and the Law for Making Changes in Various Law
No: Delegated Legislation / 703.
Date of Approval: 2nd July 2018
Date on any provide the configuration of the constraint of the con

Date and number of the Offical Gazette, in which this law is printed: -

Part 1- General Judgments

Aim:

Article 1: The aim of this law is to determine the definitions regarding the immovable and movable cultural and natural assets, organize the acts to be taken and procedures to be done, and designate the foundation and duties of the organization, which will be adopting the necessary decisions for application and in principle.

Scope:

Article 2: This law comprises of the issues regarding the immovable and movable cultural and natural assets that must be protected, and the duties and responsibilities of the natural and legal persons.

Definitions and Abbreviations:

Article 3: This article defines the following, according to the law: a-1)Cultural assets a-2) Natural assets a-3) Sites a-4) Safeguarding; Protection & Preservation a-5) Conservation Area a-6) Evaluation (Assessment) a-7) Ruins a-8) Conservation Development Plan a-9) Environmental Arrangement Plan a-10) Management Areas a-11) Site Management Plans a-12) Buffer Zones

Article 4: The need to inform:

This article rules that those who have found or possess any information about the existence of movable and immovable cultural goods are responsible with informing the nearest possible Museum Administration, or the local authorities.

Article 5: The quality of being state property:

This article denotes that all the immovable and movable cultural and natural assets are also considered as state property, except for the property of the foundations.

Part 2- The Immovable Cultural and Natural Assets that must be protected:

Article 6: Definitions: This article lists and defines the immovable cultural and natural assets. The listing provided is summarized as follows:

a) The natural assets that must preserved and the immovables constructed before the end of the 19th century.

b) The immovables that are constructed after the date but are deemed as worthy of preservation by the Ministry of Culture & Tourism.

c) The immovable cultural assets, which are in the site zones.

d) The zones and buildings that have played a historical role in the national history, the National Struggle, and the foundation of the Republic.

Article 7: Determination and Registration: This article describes the determination and registration process of the immovable cultural and natural assets.

Article 8: The authorization to make decisions regarding the Conservation Areas: This article names the regional preservation councils as entitled to take the decision whether a site is under protection and whether construction and installation of facilities may be done in areas under protection.

Article 9: The prohibition on illegal intervention and usage: According to the principles maintained by the Higher Preservation Council, physical and constructional interventions except for those approved by the regional councils cannot be made concerning the cultural and natural sites, conservation areas, and individual assets. The property cannot be opened to usage, neither their usage purposes be altered. Extensive repairs, constructions, intervention in maintenance facilities, survey drillings, partial or destruction; burning, excavating or similar interventions are categorized as constructive and physical interferences.

Article 10: Authorization and method: This article bestows the responsibility to take the necessary measures regarding the preservation of the immovable assets under protection upon the Ministry of Culture & Tourism. Though the Ministry of Culture & Tourism lies on top of the authorization and responsibility pyramid, it delegates its mandate to protect movable and immovable assets to various public institutions and bodies. Among them are the Grand National Assembly, the Ministry of Defense, and the General Directorate of the Foundations. The Metropolitan Municipalities, Governorships and District Municipalities authorized by the Ministry of Culture & Tourism are to found offices for preservation & conservation, implementation, and supervision, in which experts of fields like history of art, architecture, city planning, archaeology and engineering.

The municipalities are responsible with the territories within their boundaries and contiguous areas and the governorships with the areas outside these boundaries.

The bureaus are responsible with auditing the implementation of plans approved by the regional councils.

Article 11: Rights and responsibilities

This article defines the rights and responsibilities of the owners of the immovable cultural and natural assets.

Article 12: The financial supporting of repair of the immovable cultural and the share of contribution:
To support the cultural and natural assets under possession of natural and legal persons; the Ministry of Culture devotes a certain amount of its budget to financial contributions.

Article 13: The prohibition of selling or transfer of ownership: The immovable cultural and natural assets under the possession of the Treasury and other state institutions and organs, can neither be sold nor their possession be transferred to natural and legal persons without the permission of the Ministries of Culture and Tourism.

Article 14: Usage: This article places the rights of usage of immovable cultural and natural assets under the authorities of the Ministries of Culture and Tourism.

Article 15: Expropriation: This article defines the conditions of expropriation of the immovable cultural and natural assets.

Article 16: The prohibition on illegal constructions: This article rules that it is banned to make constructions without obtaining the required licenses, permits or permissions in the sites of immovable cultural and natural assets.

Article 17: The preservation & conservation principles of transition period in sites and the conditions of use, and the Conservation Development Plan: If a site is declared as under protection, the implementation of existing plans with any kind of scale is halted.

Until a Conservation Development Plan is compiled, the preservation principles and the conditions of use are determined by the regional council. If the plans are found appropriate by the preservation regional councils, they are sent to relevant administrative units. These units reply with listing the cons of the plan, and the regional councils make the final decision.

The environmental arrangement plans of archaeological sites are made, commissioned, and approved by the Ministry.

Article 18: Construction principles: The categorizations of the immovable cultural assets that need to be preserved are determined by the regional councils after the application of the owners.

When restitution, measured drawings, and restoration of the registered immovable cultural assets are to be made, the presence of restoration architects or architects is mandatory.

This article also specifies the measures to be taken if the principles are violated.

Article 19: The responsibility of the owners to give permission: The owners of such assets are responsible with facilitating and permitting the experts authorized by the Ministries of Culture and Tourism.

Article 20: Transport of the immovable cultural assets: The immovable cultural assets are to be protected in their original places. Under special circumstances, they can be transferred under the conditions specified by the Ministries of Culture and Tourism.

Article 21: Exceptions and exemptions: This article lists the exemptions and exceptions applied to the immovable cultural and natural assets; such as exemption from taxation.

Article 22: Removed in 1987.

Part 3: The movable cultural and natural assets that need to be protected:

Article 23: Definition: This article defines and lists the movable cultural and natural assets that need to be protected.

Article 24: Administration and surveillance: This article frames the conditions for the administration and surveillance of movable cultural and natural assets.

Article 25: Acquisition by the museums: This article specifies under what conditions and with what kind of procedures the movable cultural and natural assets are acquired by the museums.

Article 26: Museums, private museums, and collationers: This article describes the responsibilities and duties of museums, private museums, and collationers, as well as the Ministry of Culture and Tourism with respect to each other.

Article 27: The commerce of cultural assets: This article lists and frames the conditions for the commerce of the movable cultural assets.

The following articles aim to organize the commerce of movable cultural goods through bringing certain limitations.

Article 28: The ban naming the place of your residence as your work address

Article 29: The control of the commercial centers and warehouses

Article 30: The necessity to inform

Old coins

The following article is devoted specifically to coins.

Article 31: This article is removed in 1987.

Article 32: The prohibition on taking abroad

Article 33: Bringing from abroad

Article 34: Copying

Part 4: Research, surveying, excavating and searching for treasures

Article 35: The permission to research, surveying, and excavation: Only the Ministries of Culture and Tourism can issue to the permission for such acts. The article then goes onto explaining specifically how and under what circumstances these permissions are taken.

Article 36-The excavations to be done within the owners of the properties: The excavations, conducted with the purpose of finding cultural assets within their property of immovable cultural assets are subject to special permissions and frameworks.

Article 37: The procedure of the excavation permission: This article specifies the special procedures under which the permissions are given.

Article 38: Whether the permission is transferable: This article rules that these permissions cannot be transferred.

Article 39: The nullification of the permission for research, surveys, and excavations

Article 40: The time spans of the permissions for research, surveys, and excavations

Article 41: Transfer of the assets found in the excavations: All the movable cultural and natural assets found in the excavations must be transferred to the museums specified by the Ministries of Culture and Tourism. The fossils and skeletons found in such excavations can be donated to universities or other institutions specialized in natural history etc.

The following articles elucidate the details regarding limitations over the research, surveys, and excavations

Article 42: The liability to compensate damages

Article 43: The right of publication

Article 44: Expenditures

Article 45: Preservation and landscape reorganization

Article 46: Temporary or permanent suspension of research, survey, and excavation

Article 47: Transfer of the facilities

Article 48: Those taking part in the research, survey, and excavation

Article 49: The prohibition on permission for research, survey, and excavation

Article 50: Searching for treasures: This article rules that the permission to search for treasures is issued by the Ministries of Culture and Tourism.

Part 5: The foundation, duties, authorities and methods of functioning of the Higher and Regional Preservation Councils for the Preservation of Cultural and Natural Assets

Article 51: This article lists the specific duties of the Higher and Regional Preservation Councils for the Preservation of Cultural and Natural Assets. There are three main tasks of this Council:

a) To determine the principles to be applied in the preservation and the restoration of the immovable cultural and natural assets that need to be protected.

b) To maintain the necessary coordination among the regional preservation councils.

c) Evaluating the general problems occurring during implementation and helping the Ministry through providing information.

Article 52: This article is removed in 1987.

Article 53: Membership to the Higher Council: This article lists the members of the Higher Council that will be representatives of the bodies cited here.

Article 54: The qualities of the representatives: This article specifies the qualities that these representatives.

Article 55: Termination, duration of the membership to the regional and higher councils, and the financial compensation package

Article 56: This article is removed in 1987.

Article 57: The duties, authorities and the working methods of the Regional Preservation Councils: This article lists the duties of the regional councils as follows:

a) Registering the cultural and natural assets determined by the Ministry.

b) Categorizing the cultural assets.

c) Determining the transition construction conditions of the site zones in three months after their registration.

d) Inspecting the conservation development plans as well as all the changes implemented upon them and taking necessary decisions.

e) Determining the preservation & conservation areas of the immovable cultural and natural assets that need to protect.

f) Registering the immovable cultural and natural assets that have lost their qualities to exist as such and remove their registration.

g) Taking decisions aimed towards implementation regarding the immovable cultural and natural assets.

Article 58: Formation of the regional councils: This article specifies among whom the members of the regional councils can be selected.

Article 59: This article is removed in 1987.

Article 60: This article is removed in 1987.

Article 61: The obligation to obey the decisions: All the public bodies, institutions, natural and legal persons, municipalities must abide by the decisions of the Higher and Regional Preservation Councils. Any objections to decisions taken by Regional Preservation Councils by state institutions and organizations or natural and legal persons are evaluated by the Ministry and if necessary put on the agenda of Regional Preservation Councils.

Article 62: The daily allowance and per diem of the members of these councils.

Article 63: Regulations regarding the councils.

Part 6: Gratifications and punishments to be given to those who have found the cultural assets.

The following articles frame how those finding out and informing properly the authorities will be rewarded and those who are failing to do so after their discovery are to be punished.

Article 64: Gratifications.

Article 65: Punishments.

Article 66: Faking the documents, making false declarations.

Article 67: Contradiction with the obligation to report and the prohibition to trade cultural property

Article 68: Contradiction with the prohibition to take abroad Article 69: Those who block and reject controls

Article 70: Regarding private property.

Article 71: Defying the obligations regarding explorations, excavations and drills.

Article 72: Regarding the public personnel.

Article 73: Regarding the private museums and collationers.

Article 74: Regarding those conducting unauthorized research, surveys and excavations.

Article 75: Augmentation of the punishments.

Part 7: Other Provisions and the removed articles that are no longer in use.

Annex article 2: Site management, museum administration and monumental assets council: In the archaeological sites, site management units are installed. If the place is a national museum, museum administration takes over. In cases of monumental assets, monumental councils are founded.

For the preservation of the urban sites and their buffer zones, their evaluation and development, various municipalities concerned would be involved, under tutelage of the metropolitan municipality, given that the issue concerns more than one municipality. If the preservation issue concerns only one municipality, then the municipality in question is involved. In other cases, the Ministry prepares or commissions a preliminary plan.

With the aim of maintaining coordination in the urban sites and their related environs, a site manager is named by the Ministry. As a part of the management plan, a coordination and supervision committee are set up, led by the site manager.

Similar procedures apply to museum management and immovable cultural assets councils. The Ministry determines authorized persons taking part in management and councils in charge.

REQUIRED DOCUMENTS REGARDING APPLICATIONS TO THE COUNCIL

	REASON OF APPEAL									
		Group	Appeal	Exte Repa (***	ensive air *)					
REQUIRED DOCUMENTS (*)	Appeal Document	Determination of Protection	Repair and Maintenance /	Approved RLV	Restitution and Restoration Approval	Functional Change	Joinder and Allotment	Housing Authorization	Tax Exemption	
Application (In cases of applications other than the owner(s) Procuration)	x	x	x	x	x	x	x	x	x	x
Photograph Album (**)		x	Х	x	х	Х	Х	x		X
Ownership Documents (land register or other)	x	x	X	X	X	x	X	x	x	x
Cadastral Reconstruction State	x		x	X X	X	x	X			X
			^	~	^	^	^			
Cadastral Plot	x	x	X	Х	x	X	x	Х		X
Present Plot	x	x	х	х	x	x	x	х		x
Reconstruction Plan	X	x	X	Х	X	x	X	Х		X
Site Plot										X
Municipal Council Decision							Х			
Referenced Sketch				X	X	X	X			
Leveled Section	-			Х	X	X				X
Construction Plan				Х	X	X				
Document of Registration of the				Х	X	X				X
Bureau of the Architect (Current Year)					V	v				
Ivieasured Drawing and Technical Report					X	X				
Technical Report Depoting Congruity with					^	×		x		
the Approved Project								~		
Preliminary Project and Technical Report	1									x
(with drawings showing also the										
CD with Project Designs	+			x	x					x
				^	^					

*The originals of the documents, the notary approved versions, or the versions approved by the related establishments; on the plans and maps, the citation of the approval date and the plan name.

**Adequate number of photographs that presents the plot and its environs; in addition, if there are any other registered buildings in the plot, the interior and the exterior photographs of the building and its detailed photographs. (with the album in which the shooting directions are marked).

***The measured drawing restitution, and the restoration projects must be prepared according to the **05.11.1999 dated Number 660 Keynote Decision**; the projects which are for future application, such as the preliminary project, restoration project should be communicated through the related municipality together with the situation opinion of the municipality regarding the reconstruction situation. Moreover, all the projects submitted to the Council must be in the CD format.

ANNEX 5 Pre-construction Level Environmental and Social Checklist

Section 1. Sensitivities and Potential Impacts;

1. Sensitive Elements and Vulnerability of the Side

Is there any surface waterbody (seasonal, stream, lake, pond, wetland, estuarine or marine environment) close or in the construction area?

Are there any sensitive habitats (i.e. wetlands, biogenetic reserves, nature protection Areas, Wildlife Protection and Development Areas, estuarine or marine environment, etc.) close or in the operation area (i.e. construction area, service areas and service roads)?

Important Nature Conservation Sites (e.g. Important Bird Area-IBA, Important Plant Area (IPA), Inland Fish Reserve located in Istanbul (www.sifiryokolus.org) ; • West Istanbul Pastures • Phosphorous • Buyukcekmece Lake • Kilyos Dune • Kucukcekmece Watershed • Omerli Watershed • Pendik Valley • Princess Islands • Sahilkoy-Şile Coasts
Terkos Watershed
 Important Forest Areas located in Istanbul (www.wwf.org.tr); Terkos Forest (Terkos Kasatura Coast) Belgrad Forest Omerli Watershed Forests

Is there any area of recreational use, with tourism value or with land use value close or in the operation area (i.e. construction area, service areas and its service roads)?

Is the construction site located in a high groundwater table area?

Is the construction site located in an area with sensitive geological formation (i.e. karstic area, area with landslide risk, etc.)?

Is the construction site located in an area with high environmental stresses (i.e. Pollution Sensitive Area, etc.) and vulnerability against environmental pollution or stresses (conservation area of a drinking water supplying dam, near wells used for drinking water abstraction, fish spawning area, etc.)?

2. Potential Impacts

What are the processes and elements that can cause significant noise and vibration levels because of construction activities, including service and warehouse areas, access roads within the construction site?

The list of the regulations to be followed for the determination of upper and lower noise and vibration limits for environment and occupational health protection is as follows, but not limited to;

- Regulation on Assessment and Control of Ambient Noise
- Noise Regulation
- Vibration Regulation

What are the factors that can cause a significant amount of dust generation within the construction area such as service, warehouse areas, access roads and because of construction activities such as demolition, excavation, filling, construction traffic?

The list of the regulations to be followed for the determination of upper and lower air pollutant limits for environment and occupational health protection is as follows, but not limited to;

- Regulation on Air Quality Control Regulation
- Regulation on Health and Safety Measures to be taken during works with Asbestos

In the infrastructure services of the parts of the construction activities that are still in use, such as the surrounding settlements or the facilities under construction; water, electricity, natural gas etc. Is it expected to cause any interruptions or disruptions?

Is there any construction activity that might induce erosion impact in the surrounding land of the construction area?

Is there a need for additional storage space, equipment or installations for the management of wastewater and solid wastes that are expected to be released during construction works?

Are solid wastes, excavation storage areas and material storage areas specified in the mobilization plans prepared by the contractor?

The waste water and solid waste estimated to be produced from the construction activities and from any construction camps should be taken under consideration and requirement for additional septic tanks, solid waste containers, temporary solid waste storage areas for different types of solid waste, wastewater or solid waste transport vehicles, etc. should be evaluated particularly for the cases where the existing facilities are not sufficient for the handling and discharge/disposal of the project related wastewater and solid waste.

* See Section 2- Checklist for Hazardous Materials & High-Risk Areas for detailed assessment for Hazardous Wastes and Recyclables to be considered

Related Turkish Regulations:

- Waste Management Regulation
- Water Pollution Control Regulation
- Regulation on Monitoring of Surface and Groundwaters
- Regulation on Control of Packaging Waste

management, alternative access and routes been established in order not to disrupt the traffic on the roads that may be affected by construction activities and not to harm the pedestrians using the roads?

Are construction activities expected to have socio-economic impacts (visual impacts, impacts on recreational and economic activities, etc.)?

* See Section 3- Checklist for Cultural and Historical Elements for detailed assessment for socio-economic elements that are of significance.

Section 2. Environmental Pollution Control, Hazardous Substances and High-Risk Areas;

1. Asbestos

What actions will be taken to disassemble and dispose of asbestos in the building to be demolished, which will be carried out by an asbestos analysis institution accredited by the Turkish Accreditation Agency (TURKAK)?

Potential ACM are;

- HVAC system (Duct, pipe and joint insulation, boiler insulation, cooling towers, lining and mortar, fire brick, fire-proofing materials, flexible fabric connectors, mastic/adhesives (floor tile, carpet, etc.), grout and felt paper under hardwood floors)
- Electrical System (Insulators, spark arrestors and transit panels in electrical boxes, wiring insulation, ducts/conduits and light fixtures)

- Interior Walls (Wall plaster, joint compound, patches, textured paint, other spray-applied materials, transited wallboard and fire doors)
- Exterior Walls (Window putty/glazing, mortar, siding, stucco, and fire doors.
- Roofing (Roofing shingles, roofing felts, tar-type coatings -often around vents, chimneys, etc., flashings, all flat roofs and multiple layers.
- Ceilings (Tiles, tile adhesives, textured paint, wall plaster, joint compound, patches, other spray applied materials and transited wallboard. Spaces above ceilings should also be checked)
- Plumbing (Pipe wrap, pipe joints, etc.)
- Flooring (All sizes of vinyl floor tile, asphalt floor, flooring backing, linoleum)
- Insulation (Spray-applied and block ceiling/wall)
- Miscellaneous (Fire curtains and blankets, laboratory hoods/tabletops, blackboards, Elevator equipment panels, elevator brake shoes, etc.)

2. Lead

(Lead plumbing and lead-based paint are commonly found in many older buildings.)

Is exposure to any lead based or lead containing material of concern?

Possibility of exposure and handling to the following should be checked;

- Lead Based Paint (Woodwork, metal equipment, interior/exterior uses)
- Lead flashing molds and roof vents
- Lead pipes and solder
- Lead-Acid Batteries (Lighting, exit signs, security systems)

3. Mercury

Is removal or replacement of Mercury containing media or instrument required?

Potential Mercury containing elements are;

- Heating, ventilating and air-conditioning systems and appliances controlling a variety of switch functions such as temperature, water pressure, air pressure, on/off, and flow control such as thermostats, switches for air handling units, pneumatic control switches, float or level controls, similar switches.
- Several types of lights such as fluorescent Lights, Neon, etc.

4. CFC, Halons and other Refrigerants

Is there any possibility to remove or replace of any ODS (Ozone-depleting substance) containing media or instrument required?

Note that; CFCs and HCFCs are commonly found in refrigeration and air conditioning equipment and Halons are used in portable and installed fire control equipment.

5. PCB's

Is there any possibility to disassemble or replace components containing a printed circuit board (PCB)?

For electrical devices manufactured prior to 1978, it is safe to assume that they contain PCBs and handle accordingly. The potential PCB containing instruments are;

- Transformers, Capacitors (appliances, electronic equipment)
- Heat Transfer Equipment
- Light Ballasts, Sumps or oil traps in maintenance and industrial facilities

6. Other hazardous chemical or waste

Any hazardous chemicals that may be found or occur within the construction site; Are there pesticides, heavy metals, corrosive, oxidizing, toxic, flammable, explosive, irritating, carcinogenic, mutagenic, teratogenic chemicals and storage areas?

Would the dismantling, deconstruction, demolition and subsequent construction works produce other type of hazardous wastes (waste oil, waste paints, paint thinners and solvents, batteries, etc.)?

7. Infection Risk

An environment with a danger of infection for employees, medical waste, etc. Will there be, or will there be contact? What measures will be taken for this?

Would the construction and demolition activities cause infection risk for the workers, residents, users, surrounding residents or risk on public health?

* See Section 4- Checklist and Plan for Hygiene at Health Facilities for more detailed preliminary assessment for Infection Risk that might arise at medical facilities.

8. Fire Risk

Are there any fire and explosion hazard containing elements located within the construction area?

Are construction and demolition activities expected to cause an increased risk of fire and explosion? If so, describe the process to be addressed.

Recyclables;

1. Recyclable Materials

What are the recyclable materials expected to be produced in large quantities and not classified as hazardous waste? Please describe the types of waste.

Are there any recyclable materials in hazardous nature (such as batteries, etc.)?

Section 3. Cultural and Historical Elements;

1. Sensitivity of the Building and Site?

Is the building of concern classified as cultural and natural asset (retains the properties identified in Cultural and Natural Assets Conservation Law No: 2863)?

According to Cultural and Natural Assets Conservation Law No: 2863 Article 6, the cultural and natural assets to be protected are;

- The natural assets under protection
- Immovables constructed before the end of the 19th century.
- Immovables constructed after the date but are deemed as worthy of preservation by the Ministry of Culture & Tourism.
- Immovable cultural assets located within the conservation sites.
- The areas and buildings that had a historical role in the national history, the National War, the foundation of the Republic or used by Mustafa Kemal Ataturk.

(If any)What is the protection status of the building?

Historical and cultural assets classified as one of the below;

- Monument,
- Relics,
- Military,
- Administrative,
- Religious,
- Industrial commercial
- Cemetery,
- War cemetery,
- Natural,
- Cultural,
- Civil Architecture Model

(Ref: https://www.ktb.gov.tr/)

What is the protection degree $(1^{st}, 2^{nd}, 3^{rd})$ of the building?

What types of documents are required by the Cultural and Natural Assets High Council of Protection and other protection authorities (Regional Conservation Council, Conservation, Implementation and Inspection Office - *KUDEB*, etc.)?

The Regional Protection Boards (RPB) in Istanbul and the administrative regions of these boards are as follows;

Istanbul 1. RPB: Arnavutköy, Avcılar, Bağcılar, Bahçelievler, Bakırköy, Başakşehir, Bayrampaşa, Beylikdüzü, Büyükçekmece, Çatalca, Esenler, Esenyurt, Eyüp, Gaziosmanpaşa, Güngören, Küçükçekmece, Silivri, Sultangazi (except for the renovation areas in Eyüp District)

Istanbul 2 RPB: Beyoğlu, Şişli (except for the renovation areas in Beyoğlu District) **Istanbul 3rd RPB:** Beşiktaş, Sarıyer, Kağıthane

Istanbul 4. RPB: Fatih, Zeytinburnu Districts

Istanbul 5. RPB: Islands, Ataşehir, Çekmeköy, Kadıköy, Kartal, Maltepe, Pendik, Sancaktepe, Sultanbeyli, Tuzla, Ümraniye (except for the renovation areas in Tuzla) Istanbul 6. RPB: Beykoz, Şile, Üsküdar

The documents required for the relevant permits are specified in the Regulation on the Establishment, Permit, Working Procedures and Principles of Protection, Implementation and Inspection Offices, Project Offices and Training Units.

(Ref: https://korumakurullari.ktb.gov.tr/)

2. Sensitivity of the Area?

Is the building located within an area with historical or cultural value or on the parcel next to a parcel designated as cultural asset?

What is the protection status of the area?

If it is included in any of the historical or cultural sites or asset classes specified in the list below;

- Urban site,
- Archaeological site,
- Historical site,
- Natural protected area

(Ref: https://www.ktb.gov.tr/)

If the region is in a protected area, what is the protected area degree of this area (1st, 2nd, 3rd)?

Archaeological sites, historical sites, urban sites, natural sites, TC. Consisted in accordance with the Principles of the High Council for the Protection of Cultural and Natural Assets;

• Archaeological sites, protection and usage conditions (Principle Decision dated 05.11.1999)

• Conditions for the protection and use of historical sites (Principle Decision dated 16.01.2014)

• Urban sites protection and usage conditions, Policy Decision dated 25/01/2017)

• Urban Archaeological Sites, Conservation and Usage Conditions Policy Decision (Principle Decision dated 15.04.2005)

• Natural (Natural) Sites Protection and Use Conditions (Principle Decision dated 19/6/2007)

With allowed and disallowed applications are reported by defining them.

3. Risk Associated with Activities?

Are activities expected to require substantial excavation and backfilling and to generate vibration and noise? (Activities that may cause such effects; demolition and/or excavation activities of a reinforced concrete structure using explosives, etc.)

Are the activities expected to cause socio-economic impacts in areas of commercial, economic, cultural, recreational and touristic importance? (The activities that may cause such effects are as follows; heavy

transportation, excavation and mortar construction activities that have negative effects such as noise, ugly appearance, pollution in the constructions carried out in touristic areas)

Are the service areas (borrow pits, access roads, equipment/vehicle service areas, storage areas, etc.) used for material supply and similar purposes located in an area with historic and cultural value?

Is it possible to encounter archaeological and historical remains of cultural or religious importance during construction works? What processes will take place if found?

REPUBLIC OF TURKIYE

ISTANBUL PROJECT COORDINATION UNIT (IPCU)



IPCU Complaint Handling Policy

Title: IPCU Complaint Handling Policy DocID: IPCU-CHP-ENG Revision: 01 Date:17.12.2024

1. Introduction

1.1 Purpose

The IPCU has established a transparent and accessible Complaint Handling Policy that allows any stakeholder to submit grievances, raise concerns, or provide feedback regarding the planning, implementation, or management of projects.

The Complaint Handling Policy ensures that all stakeholders, including project-affected people, employees, and other relevant parties, can voice their suggestions, requests, concerns, complaints, and issues in a structured and effective manner.

To ensure effective resolution of raised issues:

- IPCU will receive, assess, and address complaints promptly.
- All complaints will be forwarded to the relevant departments for necessary action.
- Complaints will be tracked, and their resolutions recorded transparently to ensure accountability.

Contact Information:

Email: info@ipkb.gov.tr Phone: +90 (216) 505 55 00

The purpose of the Complaint Handling Policy is to strengthen IPCU's capacity to address the suggestions, complaints, and requests of its stakeholders. The mechanism provides a transparent platform for gathering feedback on the quality and quantity of services implemented by IPCU.

In addition, the CM facilitates feedback on the potential risks and impacts of internationally financed project activities, ensuring that the Project Management Unit (PMU) is informed about the corrective actions required by relevant IPCU units or personnel.

This document outlines the procedures and principles governing the Complaint Handling Policy.

1.2 Scope

This policy outlines a mechanism established to address and resolve grievances raised by all project workers and stakeholders. The project's commitment and approach are based on addressing all complaints and feedback that may arise as a direct or indirect consequence of the project's environmental and social performance. The Complaint Handling Policy does not replace stakeholder engagement activities.

This procedure covers all complaints raised by internal and external stakeholders, including those related to contractor activities. It forms part of the Management Plans developed for the project.

It can form part of the Management Plans to be developed for the project. Specifically, this procedure will be linked to the **Stakeholder Engagement Plan (SEP)** and the **Environmental and Social Management Plan (ESMP)**, particularly in relation to contractor activities, if such plans are to be developed.

1.3 Organizational commitment

This organization expects people at all levels to be committed to fair, effective and efficient complaint handling. The following table outlines the nature of the commitment expected from staff/public and the way that commitment should be implemented.

Who	Commitment	How
Director of IPCU	Promote a culture that values complaints and their effective resolution	 To ensure the implementation of this procedure, To provide the necessary resources for the implementation of the procedure. To approve this procedure and provide the necessary resources for its implementation, To coordinate with the parties for the implementation of the procedure.
Deputy Director responsible for Complaint Handling	Establish and manage our complaint management system.	 Train and empower staff to resolve complaints promptly and in accordance with IPCU's policies and procedures. Encourage staff managing complaints to provide suggestions on ways to improve the organization's complaint management system. Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly.
Social Specialist of IPCU	Demonstrate exemplary complaint handling practices	Treating all people with respect, including individuals who submit complaints, ensuring they feel heard and valued. Following applicable legislation and complying with this policy and its associated procedures. Assisting individuals in making complaints, where needed, and providing accessible platforms for grievance submission. Ensuring grievances are recorded, investigated, and resolved in a timely and acceptable manner, in accordance with this procedure. Maintaining the continuity and accuracy of the Complaint Recording Software to keep it up-to-date. Supporting the Ethics Committee in resolving sensitive complaints. Examining, classifying, and assigning complaints to determine their relevance (e.g., genuine, sensitive, or related to sub- projects). Implementing corrective actions to close complaints effectively and recording all decisions taken. Keeping informed about best practices in complaint handling and applying them to improve processes. Providing feedback and suggestions to management on issues arising from complaints and recommending ways to enhance the grievance management system. Implementing changes based on individual complaints and the analysis of complaint data, as directed by management.
All staff	Understand and comply with IPCU's complaint handling practices.	 Treat all people with respect, including people who make complaints. Be aware of IPCU's complaint handling policies and procedures. Assist people who wish to make complaints access the IPCU's complaints process. Be alert to complaints and assist staff handling complaints resolve matters promptly. Provide feedback to management on issues arising from complaints.

2. Applicable Turkish Standards

Legal Basis for the Complaint Handling

- The Constitution of the Republic of Türkiye (Article 10 Equality Before the Law): Everyone is equal before the law regardless of language, race, gender, or other reasons. Contribution: Ensures equal access to the complaint mechanism for all stakeholders, including disadvantaged groups.
- The Constitution of the Republic of Türkiye (Article 25 Freedom of Thought and Opinion): Individuals are free to express their thoughts and opinions without being subjected to pressure. Contribution: Legally protects stakeholders' right to voice complaints without fear of repercussions.
- The Constitution of the Republic of Türkiye (Article 36 Right to Legal Remedies): Everyone has the right to seek legal remedies through legitimate means. Contribution: Guarantees the complaint mechanism as a legitimate legal avenue for grievance resolution.
- Turkish Labor Law (Law No. 4857) (Article 5 Principle of Equal Treatment): Employers are obligated to treat all employees equally. Contribution: Prevents discrimination against workers and supports their access to the complaint mechanism.
- Turkish Labor Law (Law No. 4857) (Article 77 Occupational Health and Safety): Employers are responsible for ensuring a safe and healthy working environment. Contribution: Provides a legal basis for addressing complaints related to safety violations and working conditions.
- The Law on Protection of Personal Data (Law No. 6698) (Article 4 Principles of Data Protection):

Ensures the confidentiality and protection of personal data submitted through the complaint mechanism.

Contribution: Safeguards the privacy of complainants and supports the processing of anonymous and identified complaints.

- Environmental Impact Assessment Regulation (ÇED): Mandates the identification and mitigation of environmental impacts caused by projects. Contribution: Establishes a legal foundation for addressing environmental grievances related to project activities.
- United Nations Guiding Principles on Business and Human Rights:
 - Accessibility and Transparency Principle: Ensures that everyone can access an effective grievance mechanism.
 - Rights-Based Solutions: Aligns outcomes with internationally recognized human rights standards.

Contribution: Enhances the credibility of the complaint mechanism, particularly in internationally financed projects, and ensures the resolution of human rights violations.

3. Terms and Definitions

Issue: A concern or dispute that escalates to a point requiring the intervention or decision of third parties to achieve resolution. Typically, these issues involve grievances that are perceived to affect the community and have not been formally resolved for a significant period.

Complaint: A notification submitted by a community member, group, or institution regarding a perceived harm, disruption, or loss caused by project activities and/or the conduct of contractors under the scope of the project.

Suggestion: An idea or plan put forward for consideration to improve project processes, activities, or outcomes.

Dispute: An unresolved complaint that has escalated either within or outside the organization and requires further intervention or resolution.

Feedback: Opinions, comments, or expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about IPCU, its related parties, staff, or complaint handling, where a response is not explicitly or implicitly expected or legally required.

Complaint Mechanism: The formal, transparent framework to address, assess, and resolve community grievances related to the performance or behavior of the project, its contractors, or employees.

Direct Stakeholders: Persons, groups, or entities within the Project Area of Influence that are directly influenced (or potentially) by the project and/or have been identified as most susceptible to changes associated with the project. These stakeholders, including the **Steering Committee chaired by the Governor of Istanbul**, require close engagement in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.

Indirect Stakeholders: Individuals, groups, or entities that may be positively or negatively affected by the scope of the project due to its **location or nature**.

Other Interested Parties: Individuals, groups, or entities that may not experience direct impacts from the project but who consider or perceive their interests as being affected by the project and/or who could influence the project and its implementation process in some way.

Project-Affected People (PAPs): Individuals who lose, either partially or fully, permanently or temporarily, their land (residential, agricultural, or grazing), annual or perennial crops/trees, or any fixed or movable asset usage rights or other forms of benefit due to project implementation.

Vulnerable Groups: Persons who may be disproportionately impacted or further disadvantaged by the project as compared with other groups due to their **vulnerable status**. These groups require **special engagement efforts** to ensure their equal representation in the consultation and decision-making process associated with the project.

Policy: A statement of instruction that sets out how IPCU will fulfill its vision, mission, and goals.

Procedure: A statement or instruction that defines how policies will be implemented and identifies **who** will be responsible for their execution.

4. Guiding principles

4.1 Who Can Use the Complaint Handling Policy?

The Complaint Handling Policy is accessible to all stakeholders involved in or affected by IPCU projects. This includes:

1. IPCU Staff and Project Personnel:

IPCU staff, project team members, and related consultant or contractor personnel are obligated to report any inappropriate conduct or violations of IPCU Human Resources Regulations.

2. Community Members and Project-Affected People:

Residents of host communities, project beneficiaries, and any individuals or groups impacted by IPCU's internationally financed projects can use the mechanism to provide feedback, raise concerns, or submit grievances.

3. Other Stakeholders:

This mechanism is also open to NGOs, civil society organizations, and other interested parties who may have concerns or feedback regarding IPCU's project activities.

Grievances can be submitted anonymously or with full identification. Anonymous complaints will follow the same resolution process, but the complainant will not be informed of the outcome.

By ensuring transparency, accessibility, and fairness, IPCU commits to addressing all grievances promptly and effectively, fostering trust among stakeholders and maintaining accountability in project implementation.

4.2 How to Make a Complaint?

Complaints can be submitted through any of the following channels:

Internet:

- Complaints can be submitted via IPCU's official website by filling out the online complaint form.
 Website: https://www.ipkb.gov.tr/sikayet-formu/
- Payment Certificate Application: To address unpaid wage concerns on construction sites, workers can submit the official Wage Claim Application Form before the contractor's interim payment certificate is approved.

Form Link: Wage Claim Application Form

Email:

• Complaints can be sent directly to the IPCU's designated email address. **Email**: <u>mailto:info@ipkb.gov.tr</u>

Phone:

 Stakeholders can lodge their complaints by calling the IPCU's dedicated hotline during working hours.

Phone Number: +90 216 505 55 00

Official Written Submissions:

• Formal complaints can be submitted by sending a letter to the IPCU headquarters at the following address:

Address: Kısıklı Mah. Alemdağ Yan Yolu Cad. No:6 34692 Üsküdar/İSTANBUL

Physical Complaint Boxes:

- Complaint boxes will be installed at project sites, IPCU offices, and other easily accessible locations to allow stakeholders, including workers and community members, to submit their grievances confidentially and anonymously.
- Boxes will display IPCU's contact information, such as phone numbers and email addresses.

Presidency Communication Center (CİMER):

CİMER is a centralized grievance platform available for Turkish citizens, legal entities, and foreign nationals. Complaints related to IPCU projects can be submitted through the following:

- Website: <u>www.cimer.gov.tr</u>
- Call Center: 150
- Phone Number: +90 312 590 20 00
- **Fax**: +90 312 473 64 94
- Mail: Presidency of the Republic of Türkiye Communication Directorate

• In-Person Submission: Through public relations offices in governorates, ministries, and district governorates.

Foreigners Communication Center (YİMER):

YİMER is an alternative grievance platform designed specifically for foreign nationals. Complaints can be submitted as follows:

- Website: <u>www.yimer.gov.tr</u>
- Call Center: 157
- Phone Number: +90 312 157 11 22
- Fax: +90 312 920 06 09
- Mail: Directorate General of Migration Management
- E-Mail: yimer@goc.gov.tr
- In-Person Submission: At the General Directorate of Migration Management offices.

White Desk Solution Centers:

- Established by the **Metropolitan Municipality**, White Desk solution centers provide a 24-hour platform where city residents can submit complaints, requests, and opinions.
- All grievances raised are evaluated to ensure efficient and timely solutions.

Important Notes

- Anonymous Complaints: Stakeholders can submit complaints anonymously through complaint boxes or other channels. Anonymous submissions will follow the same resolution process but will not include feedback to the complainant.
- Data Protection: All complaints will be managed in accordance with the Law on Protection of Personal Data (Law No. 6698) to ensure confidentiality and privacy.
- Wage Protection: For wage-related grievances, workers must use the Wage Claim Application Form and submit it promptly to ensure their claims are addressed before contractor payments are approved.

Form Access: Wage Claim Application Form

Tracking and Reporting: Complaints submitted through CİMER or YİMER will be integrated into the IPCU Complaint Handling Policy database and processed in accordance with IPCU procedures.

5.Complaint Handling Process



The provided image outlines the **Complaint Handling Process** for IPCU in a step-by-step manner. These steps are detailed in the sections below.

The process begins with **receiving the complaint**, where grievances submitted through designated channels are recorded to ensure accessibility for all stakeholders. Once the complaint is received, it is **acknowledged** within a defined timeframe, typically two working days, confirming to the complainant that their concern has been registered and will be addressed.

Following acknowledgment, the complaint moves to the **assessment and investigation** stage. At this step, the details are thoroughly reviewed to determine the nature, validity, and severity of the issue. If necessary, additional information or supporting evidence may be requested from the complainant to facilitate a comprehensive evaluation.

Once the investigation is complete, IPCU provides a clear explanation of the findings, including the **reasons for the decision** and the actions taken. This ensures transparency and clarity for the complainant.

Finally, the process concludes with **options for redress and closure**. Corrective measures are implemented to resolve the issue, and the complainant is informed of the resolution. If the proposed solution is accepted, the complaint is officially closed. In cases where the complainant is unsatisfied, alternative redress options, including legal remedies, are communicated.

This structured approach ensures that all grievances are handled effectively, transparently, and within a reasonable timeframe, fostering trust and accountability throughout the process.

5.1 Receive of Complaints and Feedback

Complaints and feedback will be accepted if they meet the following criteria:

- The complaint or feedback is related to IPCU projects funded by International Financial Institutions (IFIs).
- The complaint or feedback is submitted by individuals, groups, communities, workers, institutions, or their representatives affected by or potentially impacting IPCU's internationally funded projects.
- The complaint or feedback indicates harm or potential harm to project stakeholders or claims the project may create additional benefits.
- The complaint or feedback is received from IPCU personnel, relevant project staff, or individuals working on IFI-financed projects.

To manage the Complaint Mechanism effectively, IPCU will assign one or more staff members. Complaints submitted through the channels listed above will be recorded in the **Complaint Track List**. A report, in the form of a **Complaint Track List** (Annex 6.2), will be generated from the system.

- Complaints will be recorded within two (2) working days of receipt.
- All grievances, complaints, suggestions have been recorded, assessed, tracked and clarified within a reasonable time frame (15 working days)

Once a complaint is received:

- 1. The **Social Specialist** will record and evaluate the complaint.
- 2. If the complaint is related to a sub-project under administrative jurisdiction, IPCU will forward the complaint to the respective **administration-level Complaint Mechanism**. IPCU will continue to monitor the progress of the complaint within its system.
- 3. If the complaint is not resolved within the committed timeframe, IPCU's Social Specialist will assume responsibility for addressing and resolving it.

5.2 Acknowledge of Complaint

Complaints and feedback will be classified based on their severity, frequency, and, most importantly, their sensitivity. The complaint categories, descriptions, and responsible parties are outlined below:

Project-Related Complaints

Category	Description	Responsible Party
Level 1	Complaints that can be addressed immediately and/or where the Social Specialist and Technical Expert of IPCU are already working on a solution.	-Social Specialist -IPCU/Contractor Technical Expert
Level 2	Single-occurrence complaints that do not impact the project timeline or the reputation of IPCU.	- Social Specialist - IPCU/Contractor Technical Expert
Level 3	Recurrent, widespread, high-profile complaints that may jeopardize the project or create reputational risks.	- Social Specialist - Ethics Committee - External Experts (if needed)

Worker-Related Complaints

Category	Description	Responsible Party
Level 1	Complaints that can be addressed immediately and/or where the Social Specialist and IPCU Technical Expert are already working on a solution.	-Social Specialist -IPCU/Contractor Technical Expert
Level 2	Recurrent, widespread, or high-profile complaints that may jeopardize the project or create reputational risks.	-Social Specialist -IPCU/Contractor Technical Expert -Ethics Committee -External Experts (if needed)

5.3 Assessment and investigation of Complaints and Feedback

IPCU evaluates complaints and feedback received from external stakeholders and employees within **15 working days** to determine if they meet the established acceptance criteria. During this evaluation process, additional information or supporting documents may be requested from the complainant to substantiate the complaint.

- If a complaint is filed against a member of the **Social Specialist**, that team member will be replaced by another relevant manager or expert during the investigation and decision-making process.
- Complaints involving IPCU personnel will be directly handled by the **Ethics Committee (EC)**, while complaints regarding relevant project personnel will be evaluated by the **Social Specialist**.
- If the complaint from project personnel involves sensitive issues, it will be referred to the Ethics Committee with assurances of confidentiality and anonymity. The evaluation process timeline for worker complaints will remain the same as for external stakeholders' complaints or feedback.

5.4 Addressing and Closing Complaints

Following the evaluation, IPCU will address the complaint within **15 working days** and take the necessary corrective actions to resolve the issue. During this period:

- The responsible parties will maintain **regular communication** with the complainant, and all correspondence will be recorded in the Complaint Mechanism System.
- If an agreement is reached regarding the closure of the complaint, the process specified in the "Complaint Closure Feedback" section will be followed.

If, due to the nature or timing of corrective actions, the complaint cannot be resolved within the 15-day period, IPCU and the complainant may agree to an extension of the resolution timeframe. Such an agreement will be documented in writing and recorded in the Complaint Mechanism System with the consent of the complainant.

5.5 Complaint Closure Feedback

Once the necessary corrective actions are taken, IPCU and the complainant will mutually agree on the closure of the complaint. The complainant will receive a **written notification** confirming that the complaint has been closed.

If agreement on closure cannot be reached, the complainant will be informed of their right to pursue **legal remedies** (see "Right to Appeal" section below). Following this notification, the complaint will be officially closed in the system.

6. Right to Appeal

If a complaint cannot be resolved through the Complaint Mechanism or involves sensitive matters, complainants always retain the right to escalate the issue to relevant legal institutions. These institutions include:

- Civil Courts of First Instance,
- Administrative Courts,
- Commercial Courts of First Instance,
- Labor Courts, and
- Ombudsman Institution (<u>https://ebasvuru.ombudsman.gov.tr/</u>).

In addition, a Mediation Commission has been established to represent our administration when necessary. For contact details of the Mediation Commission, please visit our website at https://www.ipkb.gov.tr/arabuluculuk-komisyonu/.

1. Training

To ensure general awareness among all project employees and contractors, comprehensive training sessions and induction programs will be provided. Specialized training on grievance management will also be delivered to responsible personnel. The implementation of the Complaint Mechanism will be overseen by the Social Specialist, and other designated project staff. Contractors will also be included in the application of the Complaint Mechanism to ensure consistent implementation across all levels.

8. Accountability and learning

8.1 Analysis and evaluation of complaints

IPCU will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

Regular reports will be run on:

• the number of complaints received

- the outcome of complaints, including matters resolved at the frontline
- issues arising from complaints
- systemic issues identified,

Regular analysis of these reports will be undertaken to monitor trends, measure the related staff and make improvements.

Both reports and their analysis will be provided to IPCU's Director and Deputy Director for review.

8.2 Monitoring of the complaint management system

IPCU will continually monitor our complaint management system to:

- ensure its effectiveness in responding to and resolving complaints, and
- identify and correct deficiencies in the operation of the system.
- Monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.

<u>Annexes</u>

Annex 6.1. Grievance Registration Form Annex 6.2. Complaint Track List Sample

Annex 6.1. Grievance Registration Form

ISTANBUL PROJECT COORDINATION UNIT

ŞİKAYET KAYIT FORMU / GRIEVANCE REGISTER FORM

Şikayetin Alındığı Yer/	Tarih/
Location of Complaints Received	Date
Alan Yetkilinin Adı/	Şikayet Kayıt No/
Name of Person in Charge	Complaint Register Number
Şikayete Konu Alanın Koordinatları/	
Coordinates of The Area Subject To Complaint	
ŞİKAYET SAHİBİ HAKKINDA BİLGİ / COMPLAINANT INFO	
Şikayet Sahibi kimlik bilgilerini vermeden anonim olarak doldurabilir, ancak kend / The Complainant may submit application anonymously, however in this form to respond.	isine geri dönüş şeklini bu formda belirtmesi gerekmektedir. the Complainant should indicate the feedback mechanism
Ad Soyad/	Şikayetin Geliş Yolu /
Name Surname	Form of Complaint:
TC Kimlik No/	Telefon- Ücretsiz hat /
Identification Number	Phone – Free phone line
Telefon/ E-Posta	İstişare Toplantısı/
Telephone/ E-mail	Consultation meeting
Mahalle-Köy-İlçe-İl/	Dilekçe / Petition
Neighborhood-Village –District - Province	
ŞİKAYET DETAYLARI / DETAILS OF COMPLAINT	
Şikayet Konusu /	
Complaint	
Şikayet sahibi tarafından talep edilen çözüm /	
Solution requested by the Complainant	
Şikayeti Alan Yetkilinin Ad Soyad ve İmzası / Şikayet Sahibinin Ad Soyad ve İm Surname and Signature of Complainant	zası / Name Surname and Signature of the Registerer Name

No	Ref. Number	Complain t Channel	Dat e	Packe t Name	Consultan t	Contracto r	Distric t	Building Name	Packet No	Contract Date	Complaint Date	Closed- Out Date (should be within 15 workin g days)	Subjec t	Remedial Action Plan
1														
2														
3														
4														
5														
6														

ANNEX 7 Monthly Activity Report Template

Site:				
Name of the site engineer				
Name of the site environmental engin	eer			
Name of the supervising engineer				
Works started (date):				
Number of days the environmental engineer is on site per month?				
Permits:		yes / no	comment	
	Is there a valid Demolition license?			
	Is there a valid Building License?			
	Is the location in accordance to the Water Pollution Protection Zones as determined and defined by Istanbul Water and Sewerage Administration?			
	Is there available Emergency Plan, consulted with the District Municipality or/and Istanbul Metropolitan Municipality?			
	Availability of Building Design and As-Built Drawings,			
Issue	Mitigation measure	monitoring	compliance (yes / no)	comment
Air Quality				
Dust emissions; during retrofitting or demolition activities would be minor and	Dust prevention measures and good housekeeping practices such as water spraying to prevent dust and use of curtains and screening of the construction area.	visual and continuous	E E	
	Use of masks, work gloves and clothes by workers.	visual and continuous	Ł	

	All vehicles delivering dusty construction materials to the site or removing debris will be enclosed and covered to prevent release of dust.	visual and continuous	
Vehicle exhaust emissions; carbon	Selection and use of vehicles/engines with appropriate emission control technologies and equipment.	Attests and valid permit	
Sulphur oxides (SOx) and fugitive hydrocarbons.	Maintaining of all vehicles and equipment engines and exhaust systems in order not to breach Regulation limits set for that vehicle/equipment type and mode of operation.	Attests and valid permit	
Noise and Vibration			
	To ensure the use of noise /vibration control techniques on noisy and vibratory equipment such as use of machines equipped with appropriate mufflers also located appropriately	visual and continuous	
Equipment and delivery vehicles used during retrofitting or demolition activities would generate noise and vibration. Temporary increases in noise and vibration levels along truck delivery routes would also occur.	To ensure that noise emissions / vibration frequency and speed from the site do not result in accidence of Turkish threshold values. Operating times limited to normal working hours (8 - 17h) to be determined with due sensitivity to the citizens private life (such as, working on weekends near schools, hospitals, mosques, churches praying times)	auditory and continuous	
	In the event of night-time working or working over the weekend, working hours will be discussed and agreed with the relevant authorities and after consultation with nearby communities.	agreement with relevant authorities reached	
	In case night or weekend operations are deemed necessary and the noise and vibration levels would be high, public will be informed 1 week in advance.	announcement done	
Transportation			

	Washing of tires when necessary to prevent mud on the roads. Public will be informed of alternative routes 1 week in advance.	visual and continuous		
	Use of trucks with covered dumpers	visual and continuous		
	Optimal use of alternative roads to prevent disturbance to the visitors and residents.	visual and continuous		
Waste Management				
Retrofitting and demolition activities ar	e one of the largest sources of waste.		1	
	Separate and store demolition waste from the rest of the waste	visual and continuous		
	Separate recyclable fractions (like metal) from demolition waste	visual and continuous		
Demolition Debris Handling	Obtain certificate on Construction and Demolition waste from Istanbul Metropolitan Municipality	certificate		
	Keep track recording on waste disposal in construction diary and keep certificates of disposal from landfill	construction diary and certificates		
	Provide storage, transportation and disposal activities in accordance with the current regulation.	visual and continuous		
	Define types of potentially hazardous waste to be handled during retrofitting in accordance with the Regulation.	visual and continuous		
Hazardous Waste Handling	Separate and store different types of hazardous waste from the rest of the waste	visual and continuous		
	Keep track recording on waste disposal in construction diary and keep certificates of disposal from authorized company for hazardous waste management	certificates and construction diary		

	Obtain agreement with the authorized company for hazardous waste management	agreement	
	Provide handling, storage, transportation and disposal/destruction activities in accordance with the regulation.	visual and continues	
Handling Medical Wastes (relevant for	Hospital Management will make plans regarding the collection, storage, and disposal of medical wastes, and provide the necessary training for the staff in charge.	confirm that this is done with hospital management	
hospitals retrofitting)	Hospital management will take necessary measures for continuous management of medical wastes during retrofitting activities , if hospital services are continuing.	confirm that this is done with hospital management	
	Consult the owner/manager of the building for possible existing material containing asbestos (It is envisaged that design drawings and specification will provide input for this issue.)		
Handling Asbestos Containing Material	Prepare a Plan for handling the asbestos containing material in accordance with the Regulation.	plan	
	Make the necessary arrangements for ultimate disposal of asbestos containing materials in licensed hazardous waste disposal sites such as IZAYDAS.	contracts	
	Execute mitigation measures during retrofitting activities in accordance with this Plan.	visual	
Public Safety			
	Is the object being retrofitted vacant?		
	Entrance of public to the construction site will be		
	prevented by using warning signs and lights, and barriers, fences etc.		
Waste Water (Point/Non-Point) Hand	ling		

	To prevent any water pollution due to construction activities contractor will provide facilities for discharge of wastewater and/or spill erosion during construction;			
	Either to city sewerage system (if available) directly, or	visual		
	Through portable toilets	visual and disposal certificates		
	Through septic tanks to be constructed in sufficient capacity, and periodically evacuated.	visual		
	Additional necessary precaution shall be taken to prevent the pollution of nearby water courses by the wastewater resulting from construction activities.	visual		
Other issues				
Inspection visits	when and which inspection	conclusion		
Complaints from the public	when and why	action taken		
			Γ	1
date of the report	place	signature		

ANNEX 8 Code of Conduct

As the Contractor, *[insert the name of the Contractor]*, we have signed a contract with [*Employer's name will be inserted*] for *[job name and description to be entered*]. These works will also be carried out at [insert the names of the construction sites and other locations where the works will be done]. The contract obliges us to take measures to address environmental and social risks associated with work, including the risks of sexual exploitation, abuse, and gender-based discrimination.

This Code of Conduct (CoC) is part of the measures we take to mitigate environmental and social risks associated with work. It applies to all our employees at the site or other places where work is executed. Additionally, this CoC applies to the personnel of each subcontractor and other personnel who assist us in executing the works. All such personnel are called "Contractor's Personnel" and are subject to this CoC. This CoC defines the required behavior of personnel identified as "Contractor's Personnel."

We commit to maintaining a safe working environment where unsafe, abusive, or violent behavior will not be tolerated, and all individuals can express their problems or concerns without fear of retaliation.

Required Conduct

Contractor's Personnel shall:

- 1. Carry out their duties competently and diligently.
- 2. Comply with this CoC and all applicable laws, regulations, and other requirements, including those protecting the health, safety, and well-being of the Contractor's personnel and any other person.
- 3. Organize a safe working environment, including:
 - Ensuring that workplaces, machinery, equipment, and processes under each person's control are safe and do not pose a health risk.
 - Using/wearing necessary personal protective equipment (PPE).
 - Using appropriate measures regarding chemical, physical, and biological substances and agents.
 - Following applicable emergency operations procedures.
- 4. Report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and danger to his/her life or health.
- 5. Treat all individuals with respect and avoid discrimination based on gender, disability, ethnicity, or other characteristics.
- 6. Avoid and report all forms of sexual harassment, including unwelcome sexual advances, request for sexual favors, and other unwanted verbal or physical conduct of a sexual nature with other Contractor's or Employer's personnel.
- 7. Avoid sexual exploitation, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including abuse of positions of power for sexual purposes or benefits.
- 8. Avoid sexual assault, which means any form of non-consensual sexual contact that does not result in or include penetration.

- 9. Avoid any form of sexual activity, abuse, or inappropriate behavior towards children, which includes actions that compromise their safety or well-being within project areas.
- 10. Complete mandatory training on environmental, social, and OHS-related aspects of the contract, including Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH).
- 11. Engage respectfully with local communities, considering their cultural traditions and norms, and avoid any behavior that could be perceived as inappropriate or offensive.
- 12. Use designated sanitary facilities and adhere to environmental norms, avoiding any actions that could harm the environment.
- 13. Avoid conflicts of interest, including granting preferential treatment, contracts, or benefits to individuals with financial, familial, or personal connections.
- 14. Ensure the protection and proper use of property, avoiding theft, carelessness, or waste.
- 15. Report any violations of this CoC.
- 16. Avoid hostility towards anyone reporting a violation of this CoC or using the [Project GM].

Reporting Violations

Personnel must immediately report any behavior they believe violates this CoC, without fear of retaliation, and such reports will be protected and taken seriously if made in good faith. This can be done by:

- Contacting [insert the name of the Contractor's Social Specialist designated for addressing genderbased discrimination] via phone [insert number], in writing [insert email address], or in person.
- Calling the Contractor's hotline [insert number] and leaving a message.

All reports will be treated confidentially unless reporting is required by law. Anonymous complaints will be appropriately addressed. Reports of potential abuse will be taken seriously, and immediate support will be provided to survivors, including access to services and guidance.

Hostility towards individuals raising concerns is prohibited and constitutes a violation of this CoC.

Consequences of Violations

Violations of this CoC by Contractor Personnel may result in serious consequences, including job termination and potential referral to legal authorities.

Signature and Acknowledgment

For Contractor Personnel: I have received a written copy of this CoC in a language I understand. A copy of this CoC will be displayed in prominent locations at the project site, and all Personnel will receive training on its contents. If I have any questions, I will contact *[insert the name of the Contractor's Social*

Specialist].

Contractor Personnel Name:	
Signature:	
Date:	
For the Authorized Contractor Representative:	
Signature:	
Date:	
ANNEX 9 Environmental and Social Screening Form

The E&S Screening procedure comprises of two stages-process: (i) initial screening by using the **Exclusion List** in Annex 3 of the ESMF; and (ii) screening the proposed activities to identify the approach for E&S risk management.

This Screening Form is the second stage of screening process and is to be used for all subproject activities. The completed forms will be signed and kept in the records of the IPCU.

1. Subproject Information:

Subproject Title	
Subproject Location	
Regional Unit in Charge	
Estimated Cost	
Start/Completion Date	
Brief Description of	
Subproject	

2. Environmental and Social Screening Questionnaires

	Questions	Answer		Novit Stone
	Questions			Next Steps
ESS1	L			
1	Is the subproject likely to have significant adverse environmental impacts that are sensitive and unprecedented that trigger the 'Ineligible Activities' or other exclusion criteria?			If "Yes": Exclude from project.
2	Does the subproject involve <u>new construction</u> <u>or significant expansion</u> of ponds, solid waste management systems, shelters, roads (including access roads), community centers, schools, bridges and jetties?			If "Yes": 1. Prepare a site-specific ESMP by customizing the project level ESMP for the proposed subproject, based on the template in ANNEX 10 2. Include E&S risk management measures in bidding documents.
3	Does the subproject involve <u>renovation or</u> <u>rehabilitation</u> of any small-scale infrastructure, such as groundwater wells, latrines, showers/washing facilities, or shelters?			If "Yes": 1. Prepare a site-specific ESMP by customizing the project level ESMP for the proposed subproject, based on the template in Error! Reference source not found. . 2. Include E&S risk management measures in bidding documents.
4	Will construction or renovation works require new borrow pits or quarries to be opened?			If "Yes": 1. Prepare a site-specific ESMP by customizing the project level ESMP for the proposed subproject, based on the template in ANNEX 10. 2. Include E&S risk management measures in bidding documents.
5	Does the project lead to any risks and impacts on, individuals or groups who, because of their circumstances, may be disadvantaged or vulnerable?			If "Yes": Apply relevant measures described in the ESMF.
E22				

6	Does the subproject involve uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor?	If "Yes": Exclude from project.
7	Does the subproject involve recruitment of workforce including direct, contracted, primary supply, and/or community workers?	If "Yes": Apply LMP
8	Will the workers be exposed to workplace hazards that needs to be managed in accordance with local regulations and KfW Group Environmental, Health and Safety Guidelines (EHSGs)? Do workers need Personal Protection Equipment (PPE) relative to the potential risks and hazards associated with their work?	If "Yes": Apply LMP
9	Is there a risk that women may be underpaid when compared to men when working on the project construction?	If "Yes": Apply LMP
10	Is the project expected to have any OHS related risks and impacts?	If "Yes": Prepare a site-specific ESMP by customizing the project level ESMP and OHS Plan for the proposed subproject, based on the templates in Error! Reference source not found. and ANNEX 11.
ESS	3	
11	Is the project likely to generate solid or liquid waste that could adversely impact soils, vegetation, rivers, streams or groundwater, or nearby communities?	If "Yes": 1. Prepare a site-specific ESMP by customizing the project level ESMP for the proposed subproject, based on the template in ANNEX 10. 2. Include E&S risk management measures in bidding documents.
12	Do any of the construction works involve the removal of asbestos or other hazardous materials?	If "Yes": Prepare a site-specific ESMP by customizing the project level ESMP and Asbestos Management Plan for the proposed subproject, based on the template in Error! Reference source not found. and ANNEX 12
13	Are works likely to cause significant negative impacts to air and / or water quality?	If "Yes": 1. Prepare a site-specific ESMP by customizing the project level ESMP and Asbestos Management Plan for the proposed subproject, based on the template in Error! Reference source not found. 2. Include E&S risk management measures in bidding documents.
14	Does the activity rely on existing infrastructure (such as discharge points) that is inadequate to prevent environmental impacts?	If "Yes": 1. Prepare a site-specific ESMP by customizing the project level ESMP based on the template in ANNEX 10. 2. Include E&S risk management measures in bidding documents.
ESS4	1	

15	Is there a risk of increased community exposure to communicable disease (such as infectious disease outbreaks, HIV/AIDS, Malaria), or increase in the risk of traffic related accidents?	If "Yes": Apply LMP and relevant measures in SEP.
16	Is an influx of workers, from outside the community, expected? Would workers be expected to use health services of the community? Would they create pressures on existing community services (water, electricity, health, recreation, others?)	If "Yes": Apply LMP
17	Is there a risk that SEA/SH may increase because of project works?	If "Yes": Apply LMP
18	Would any public facilities, such as schools, health clinic, mosque/church be negatively affected by construction?	If "Yes": Prepare a site-specific ESMP by customizing the project level ESMP based on the template in ANNEX 10.
19	Will the subproject require the government to retain workers to provide security to safeguard the subproject?	If "Yes": Prepare a site-specific ESMP by customizing the project level ESMP based on the template in Error! Reference source not found.
ESS		
20	Does the sub-project involve involuntary land acquisition?	If "Yes": Exclude from project.
21	Does the sub-project involve physical and/or economic displacement of people?	If "Yes": Exclude from project.
22	Is private land required for the sub-project activity being voluntarily donated to the sub-project?	If "Yes": Exclude from project.
23	Is there any possibility to move out, or close of business/commercial/livelihood activities of persons during construction (are there any formal/informal users or non-titled people who are utilizing/inhabiting/doing business or using for other purposes etc.) the proposed site/project locations that will be used for civil work? If yes, please provide how many and for what purposes)?	If "Yes": Exclude from project.
24	Will there be any expropriation under the sub- project?	If "Yes": Exclude from project.
ESSe	5	
25	Does the subproject involve activities that have potential to cause any significant loss or degradation of critical habitats9 whether directly	If "Yes": Exclude from project.

⁹ Environmental and Social Standard 6, paragraph 23: "Critical habitat is defined as areas with high biodiversity importance or value, including (a) Habitat of significant importance to Critically Endangered or Endangered species, as listed in the IUCN Red List of threatened species or equivalent national approaches; (b) Habitat of significant importance to endemic or restricted-range species; (c) Habitat supporting globally or nationally significant concentrations of migratory or congregatory species; (d) Highly threatened or unique ecosystems; and (e) Ecological functions or characteristics that are needed to maintain the viability of the biodiversity values described above in (a) to (d)."

	or indirectly, or which would lead to adverse impacts on natural habitats10?	
26	Will the project involve the conversion or degradation of non-critical natural habitats?	If "Yes": 1. Prepare a site-specific ESMP by customizing the project level ESMP based on the template in Error! Reference source not found. 2. Include E&S risk management measures in bidding documents.
27	Will this activity require clearance of natural forests?	If "Yes": Exclude from project.
28	Will this activity require clearance of trees, including inland natural vegetation?	If "Yes": 1. Prepare a site-specific ESMP by customizing the project level ESMP based on the template in Annex 10 2. Include E&S risk management measures in bidding documents.
29	Will there be any significant impact on any ecosystems of importance (especially those supporting rare, threatened or endangered species of flora and fauna)?	If "Yes": Exclude from project.
ESSE	}	
30	Is the subproject to be located adjacent to a sensitive site (historical or archaeological or culturally significant site) or facility?	If "Yes": Apply Chance Find Procedures in Error! Reference source not found.
31	Does the subproject locate near buildings, sacred trees or objects having spiritual values to local communities (e.g. memorials, graves or stones) or require excavation near there?	If "Yes": Apply Chance Find Procedures in ANNEX 13.

3. Conclusion

Based on the result from the screening above, please write the E&S risk rating and list the E&S risk management instruments to be prepared/adopted and implemented:

a)

b)

Name and title of person who conducted screening: Date of screening:

¹⁰ Environmental and Social Standard 6, paragraph 21: "Natural habitats are areas composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified an area's primary ecological functions and species composition."

ANNEX 10 Project Level Environmental and Social Management Plan (ESMP)

[Environmental and social risks and impacts are strongly linked to subproject location and scope of activities. This ESMP should be customized for each specific subproject location and activities.] Sub-project Information

Sub-project Title:	
Estimated Cost:	
Start/Completion	
Date:	

Site/Location Description

This section concisely describes the proposed location and its geographic, ecological, social and temporal context including any offsite investments that may be required (e.g., access roads, water supply, etc.). Please attach a map of the location to the ESMP.

Sub-project Description and Activities

This section lists all the activities that will take place under the subproject, including any associated activities (such as building of access roads or transmission lines, or communication campaigns that accompany service provision).

ESMP Matrix: Risk and Impacts, Mitigation, Monitoring

This section should identify anticipated site-specific adverse environmental and social risks and impacts; describe mitigation measures to address these risks and impact; and list the monitoring measures necessary to ensure effective implementation of the mitigation measures. It may draw from the ESMF's pre-identification of potential risks/impacts and mitigation measures, as applicable, and drill down further to ensure relevance and comprehensiveness at the site-specific level. For subprojects involving construction, two sets of tables may be needed, for the construction phase and the operation phase. The below Environmental and Social Management Plan covers all sub-project activities and will be customized for "Category B " or "Low' and "Moderate" risk sub-projects. (please add rows depending on the impacts of the components).

Dotontial Picks and		Ph	ase			Fre of Mo g	quer nito	rin	
Impacts	Proposed Mitigation Measures		Construction	Operation	Indicators for monitoring	Continuous	Monthly	Quarterly	Responsibility for Estimated implementation and Cost ¹¹ monitoring
General for All Constru	ction Works								
Environmental and Social (E&S) Management	 Contractor will prepare and submit for approval and subsequently implement its Contractor ESMP (C-ESMP). The C-ESMP should be submitted prior to the commencement of construction works and no construction activities will be carried out under the sub-project until approval of the C-ESMP. The C-ESMP will include at least the following site-specific management plans: Occupational health and safety (OHS) management plan including risk assessment and emergency response plan (see the outline in Error! Reference source not found. of the Environmental and Social Management Framework (ESMF) of the project) Community health and safety (CHS) management plan including traffic management plan (see outline in ANNEX 14 of ESMF of the project) Waste management Plan (see ANNEX 15 of ESMF of the project) Chance Find Procedure (see Error! Reference source not found. of the project) 	x	x		All sub- managemen t plans are approved prior to construction and implemente d throughout the construction period.		x		Contractor (Implementation) Supervision Consultant (Design)

¹¹ This is an estimation cost for the proposed mitigation measures. Relevant bodies should assess this column accordingly to the sub-projects under their responsibilities.

	 Labor Management Plan (to be prepared in accordance with project LMP) Grievance mechanism (GM) for both community and workers. The Contractor shall hire or appoint full-time¹² one environmental and social and OHS specialists to the commencement of construction works. The Contractor shall submit the CVs of specialists for approval. These specialists should be present at the site throughout the construction period. 	x	x	Relevant E&S staff is mobilized and maintained throughout the construction period.	x	Contractor (Implementation) Consultant (Supervision)
	 The Contractor will prepare a training program and provide training to all its staff, before they start working on site, on basic environmental, social, health and safety (ESHS) risks associated with the proposed construction works and the workers' responsibility. The training program shall be repeated on quarterly basis. The Contractor's quarterly training program will also cover topics related to Code of Conduct such as sexual harassment particularly towards women and children, violence, including sexual and/or gender-based violence and respectful attitudes while interacting with the local community. 	x	x	Training program approved and all relevant staffed trained. Training records	x	Contractor (Implementation) Consultant (Supervision)
Resource Efficiency and Pollution Prevention	 To address the identified risks and enhance resource efficiency and pollution prevention, the following measures will be implemented: Ensure that all retrofitted buildings achieve at least Turkish Class C Energy Performance Certification standards (TS825) and all newly constructed buildings achieve at least Class B. 	x	x	compliance with energy and water efficiency standards, proper waste and	2	Contractor (Implementation) Consultant (Supervision)

 $^{$^{12}}$ Full time site-specific assignment may be required according to sub-project complexity.

• Integrate renewable energy systems, such as	pollution
solar panels, to reduce energy consumption	managemen
and ensure operational continuity during	
disasters.	Implementa
 Install water-saving systems, including low- 	tion of
flow toilets, efficient taps, and showerheads,	nature-
and implement rainwater harvesting and	based
greywater reuse where feasible and/or	solutions,
applicable.	and
• Reuse demolition materials (e.g., debris as	stakeholder
filling material) and ensure high percentage of	feedback
recycling of iron and other recyclable	resolution.
materials.	
• Enhance green infrastructure by creating	
parks, green roofs, and vegetative buffers to	
manage stormwater, mitigate urban heat	
effects, and conserve biodiversity where	
feasible and/or applicable.	
 Regularly monitor and evaluate the 	
performance of nature-based solutions to	
ensure their long-term effectiveness.	
 The areas where waste management will be 	
carried out during the operation process	
should be determined at the planning stage	
Conduct a tree survey during the planning	
 Conduct a tree survey during the planning phase to identify and document existing trees 	
on the site, ensuring protection and	
conservation of mature trees wherever	
possible	
 Tree planting and the use of fire resistant 	
The planting and the use of me-resistant	
native plant species in landscaping projects	
can mugate urban neat Island effects while	
supporting ecological functions.	
• Nature-based solutions, such as rainwater	
gardens and permeable surfaces, can reduce	
runoff, recharge groundwater, and enhance	
local ecosystems.	

Air Pollution (Dust and Exhaust)	 Minimize dust from exposed work sites by applying water on the ground regularly during the dry season. Construction debris shall be kept in a controlled area and sprayed with water mist to reduce debris dust especially during the dry season Keep stockpiles of aggregate materials covered to prevent suspension or dispersal of fine soil particles during windy days or disturbances by stray animals. In case of pneumatic drilling during excavation, dust shall be suppressed by ongoing water spraying and/or construction dust screen enclosures at the site. The surrounding environment, such as roads, shall be kept free of debris to minimize dust. Trucks transporting excavated materials or construction waste shall have their loads securely covered to prevent dust and spillage during transit. There shall be no open burning of construction or waste materials at the site. 		x	Visual inspection of air quality control measures Records of maintenanc e Records of complaints	x	Contractor (Implementation) Consultant (Supervision)
Noise	 To reduce noise in buildings located near highways or other significant noise sources solutions shall be taken in consideration: Use acoustic panels or soundproof drywall to reduce sound transmission Incorporate mineral wool, fiberglass, or foam boards into walls to enhance noise reduction Use soundproof glass with air gaps to block external noise Place sound walls or acoustic barriers between the building and the noise source such as noise barriers Use dense vegetation, such as trees and shrubs, to naturally block and absorb sound 	x				Design Consultant Contractor (Implementation) Consultant (Supervision)

 waves. Include acoustic ceiling tiles and sound- absorbing wall panels to reduce reverberation inside the building. 					
 inside the building. Limit construction activities to hours specified by national regulations, and coordinate with nearby communities to schedule noisy tasks during times that cause minimal disturbance. During operations, equipment will be placed as far away from residential/community areas as possible. All equipment will be maintained to keep it in good working order by manufacturing maintenance procedures and installing acoustic enclosures around generators to reduce noise levels. Use when needed and feasible noise-control methods such as fences, barriers or deflectors (such as muffling devices for combustion engines or planting of fast-growing trees) Avoid the unnecessary use of alarms, horns and sirens. Minimize project transportation through community areas. Maintain a buffer zone (such as open spaces, rows of trees or vegetated areas) between the project site and residential areas to lessen the impact of noise to the living quarters. Noise measurements shall be conducted if any grievance regarding noise generation is received from the nearest receptors. If measured levels are above limit values, mitigation measures shall be enhanced in this respect, i.e., installing acoustic barriers for mechanical equipment, limiting the hours of 	x	Visual inspection of noise control measures Records of complaints	x	Contractor (Implementation) Consultant (Supervision)	
operation for specific pieces of equipment or operations, etc.					

Health and Safety OHS-related risks due to unsafe practices and hazards at work sites such as work at height, rotating and moving equipment	 When planning activities, discuss steps to avoid people getting hurt. It is useful to consider: Construction place: Are there any hazards that could be removed or should warn people about? The people who will be taking part in construction: Do the participants have adequate skill and physical fitness to perform their work safely? The equipment: Are there checks you could do to make sure that the equipment is in good working order? Do people need any skills or knowledge to enable them to use it safely? Electricity Safety: Do any electricity good practices such as the use of safe extension cords, voltage regulators and circuit breakers, labels on electrical wiring for safety measures, awareness on identifying burning smells from wires, etc. apply at the site? Is the worksite stocked with voltage detectors, clamp meters and receptacle testers? 	x		Visual inspection Employee records Equipment		×	Contractor (Implementation) Consultant (Supervision)
electrical safety, working with hazardous material, etc.	 Appropriate signposting of the construction sites will inform workers of key rules and regulations to follow. The contractor's OHS specialist will provide a brief daily toolbox talk to the construction workers on ESHS risks associated with the construction activity that will be carried out on that day that day. The Contractor will ensure a safe working environment for the workers and before construction activities will supply appropriate personal protective equipment (PPE) in line with international best practice and Turkish Legislation (hard hats, gloves, dust masks, goggles, harnesses and safety boots, etc.). All activities will be implemented in line with 		x	Visual inspection of control measures OHS records Employee records Incident statistics and records Records of worker's complaints	x		Contractor (Implementation) Consultant (Supervision)

both the Law on Occupational Health and
Safety (Official Gazette No:.28339, dated June
30, 2012) and its relevant regulations and
with the World Bank Group EHS Framework.
The Contractor will Immediately notify the
IPCU (through supervision consultants) about
any serious incident which may have
significant adverse effects on the
environment the affected communities the
nublic or workers. Then IPCU will notify the
World Bank about any serious incident in 48
hours and send an incident investigation
report together with the root-cause analysis
and corrective action plan no later than 10
drug to the World Dank
udys to the worksite share and face of debuis
Keep the worksite clean and free of debris
The first aid kit should be equipped with
bandages, antibiotic creams, etc. or delivered
to health institutions.
Following safety guidelines for the storage,
transport, and distribution of hazardous
materials aiming to minimize the potential for
misuse, spills, and accidental human
exposure.
Keep corrosive fluids and other toxic materials
in properly sealed containers for collection
(considering its MSDS) and disposal in
properly secured areas.
Ensure structural openings are
covered/protected adequately.
Secure loose or light material that is stored on
roofs or open floors.
• Keen hoses power cords welding leads etc
from laving in heavily travelled walkways or
a During heavy rains or emergencies of any

	kind suspand all work						
	Killu, suspenu ali work.						
	 Follow the below measures for construction involving work at height. 						
	Involving work at neight.						
	• Do as much work as possible from the ground.						
	 Do not allow people with the following 						
	personal risks to perform work at height						
	tasks: eyesight/balance problem; certain						
	chronic diseases – such as osteoporosis,						
	diabetes, arthritis or Parkinson's disease;						
	certain medications – sleeping pills,						
	tranquilizers, blood pressure medication or						
	antidepressants; recent history of falls –						
	having had a fall within the last 12 months,						
	etc.						
	 Only allow people with enough skills, 						
	knowledge and experience to perform the						
	task.						
	• Check that the place (e.g., a roof) where work						
	at height is to be undertaken is safe.						
	 Take precautions when working on or near 						
	fragile surfaces.						
	Clean up oil, grease, paint, and dirt						
	immediately to prevent slipping in accordance						
	with Emergency Response Plan; and						
	Provide fall protection measures e.g. safety						
	hardness, and simple scaffolding/guard rail for						
	works over 4 meters from the ground.						
	• The contractor shall hire trained operators for						
	the safe operation of specialized						
	construction's vehicles						
Community Health	Rope off construction area and secure		Visual				
and Safety	materials stockpiles/ storage areas from the		inspection			Contractor	
	public and display warning signs including at		of control				
Community health	unsate locations.	Х	measures	Х		Supervision	
and satety risks	Do not allow to entrance unauthorized person					Consultant	
associated with	in construction areas.		Irattic			·	
construction	 Fill in all earth borrow-pits once construction 		accident				

activities, including	is completed to avoid standing water. water-	records
health issues arising	borne diseases and possible drowning.	
from exposure to	Regularly drain stagnant water from	Records of
waste, stagnant	construction areas to prevent the breeding of	complaints
water, wastewater.	mosquitoes and other disease vectors.	
particulate matter.	Use covered and sealed storage for	
and construction	wastewater to prevent leaks and odors while	
workers, as well as	maintaining safe drainage systems to avoid	
traffic and road-	contamination of nearby water bodies	
related risks caused	Provide clean and well-maintained sanitation	
by increased traffic	facilities for workers including toilets and	
volume and the	washing stations	
movement of heavy-	The construction site security personnel must	
duty vehicles due to	be trained and officially certified	
inadequate	Control the driving speed of vehicles	
construction and	narticularly when passing through a	
traffic management.	community or nearby school health center or	
0	other sensitive areas	
	 If school children are in the vicinity include 	
	traffic safety personnel to direct traffic during	
	school hours if needed	
	• The project site must be lit during the night	
	The project site must be in during the hight. The surrounding construction area should be	
	 The surrounding construction area should be kent clean, without waste disposed of there 	
	The broken glass should be cleaned	
	immediately to avoid any fires	
	 Following safety guidelines for transportation 	
	 Following safety guidelines for transportation of bazardous materials to the site aiming to 	
	minimize the potential for spills and	
	accidental human exposure due to traffic	
	accidents	
	Effective communication systems are needed	
	to inform communities about project	
	activities notential risks and emergency	
	nrocedures	
	Regular maintenance such as periodical	
	control of vehicles to minimize notentially	
	control of vehicles to minimize potentially	

serious accidents caused by equipment	
malfunction or premature failure.	
The public will be informed about the work to	
be carried out, including the measures taken	
regarding communicable diseases relating to	
labor influx and -post-disaster context (i.e.,	
infectious disease outbreaks), using	
appropriate communication tools and	
methods (e.g., online/virtual and/or	
physically) in areas accessible to all	
stakeholders (including work sites).	
In case of any epidemic or pandemic /	
communicable disease, including infectious	
disease outbreaks, the guidance, guidelines,	
and recommendations to be provided by the	
Ministry of Health, the Ministry of Family and	
Social Services, the Ministry of Labor and	
Social Security, and the World Health	
Organization will be followed, and all relevant	
measures will be taken for both employees	
and workplaces in terms of OHS and CHS. In	
addition, all construction works will follow the	
World Bank guidelines to minimize the risk of	
infectious disease outbreaks transmission	
during the execution of civil works.	
Include evacuation protocols, first aid	
training, and clear communication strategies	
in the ERP ¹³ to protect community health and	
safety.	
Any traffic diversions should consider the	
needs of disabled persons.	
The Contractor will ensure the construction	
site is properly secured and construction-	
related traffic regulated properly (including	
proper route planning). This will include but	

 $^{^{13}}$ A template for Emergency Response Plan (ERP) in Annex 16

	 not be limited to: Signposting, warnings, barriers, and traffic diversions: the site will be visible, and the public warned of all potential hazards. 					
	• Traffic management system and staff training, especially for site access and near-site heavy traffic. Provision of safe passages and crossings for pedestrians where construction					
	 traffic interferes. Adjustment of working hours to local traffic patterns, e.g. avoiding major transport activities during rush hours or times of livestock movement. Active traffic management by trained and visible staff at the site, if required for a safe and convenient passage for the public 					
Water Quality and Wastewater: Water pollution in nearby surface waters due to wastewater/waste generated at the construction area due to construction activities	 The site will establish appropriate erosion and sediment control measures such as e.g. hay bales and/or silt fences to prevent sediment from moving off-site and causing excessive turbidity in nearby surface waters. Minimize storage or disposal of generated wastewater on the site. Temporary or final waste disposal and wastewater discharge without treatment near/in surface waters is strictly forbidden to prevent possible adverse impacts on surface waters. No soiled materials, solid wastes, toxic or hazardous materials should be stored in, poured into or thrown into water bodies for dilution or disposal. Construction vehicles and machinery will be washed only in designated areas where runoff will not pollute natural surface waters. Wastewater generated at the construction site will be connected to the sewerage system, if possible, and approved by local 	x	Visual inspection of control measures Septic tank effluent disposal records (if any) Effluent quality measureme nt records (if any) Records of complaints	x	Contractor (Implementation) Consultant (Supervision)	

	 authorities. If this is not possible, it will be deposited in the septic tank that will be impervious, in accordance with "Regulation on Pit Opening Where Sewer System Construction is not Applicable" published in Official Gazette No: 13783 dated 19.03.1971. Toilets with temporary septic tank might be used for this purpose as well. Septic tank effluent will be removed periodically by sewage trucks, and disposal will be provided within the scope of the protocol to be made with the relevant municipality that has a licensed wastewater treatment plant (WWTP). The Protocol will be submitted to the IPCU. Activities should not affect the availability of water for drinking and hygienic purposes. The flow of natural waters should not be obstructed or diverted in another direction, which may lead to the drying up of river beds or flooding of settlements. Separate concrete works in waterways and keep concrete mixing separate from drainage leading to waterways. 				
Soil and Groundwater Quality: Soil and groundwater pollution due to improper waste management and accidental spills, and soil erosion	 Apply the mitigation measures specified in the "Solid and Hazardous Waste" section for proper waste management. Residual (left out) concrete in concrete mixers will not be allowed to wash out into the construction site, its vicinity, or access roads of construction sites. Related trainings will be provided to concrete mixer drivers. Hazardous and chemicals and materials will be secured in a designated storage area to prevent spillage and tip-over. Semi-used chemical-containing containers will have lids and lids will be tightened while they 	x	Visual inspection of control measures Incident records Training records Records of complaints	x	Contractor (Implementation) Consultant (Supervision)

	are not in use				
	 In case of a spill of any hazardous material or 				
	hazardous wastes, spill prevention methods				
	mentioned in ERP will be put in place to limit				
	the exposure area. Workers who might				
	intervene in such incidents should have				
	relevant trainings on emergency response to				
	spills.				
	Proper spill kits will be placed at appropriate				
	locations in the construction area.				
	Schedule construction during the dry season,				
	as appropriate.				
	Contour and minimize the length and				
	steepness of slopes.				
	Cover with topsoil and re-vegetate (plant				
	grass, fast-growing plants/bushes/trees)				
	construction areas quickly once work is				
	completed.				
	Excavation soil, construction and demolition				
	waste Dumping Permit must be obtained from				
Waste Management	the Municipality.				
EHS risks due to	 Excavation waste will be re-used for backfilling purposes as much as possible and 		Visual		
mappropriate	backfilling purposes as much as possible and		inspection		
waste generated due	considered as appropriate (except asbestos or		of control		
to construction	ashestos-containing waste)		measures		Contractor
activities (such as	Becycling and reusing materials during		Waste		(Implementation)
construction	demolition and construction reduces demand X	х	generation	x	(
demolition wastes,	for raw natural resources, indirectly		and disposal		Consultant
hazardous waste,	supporting sustainable management		Training		(Supervision)
biodegradable	practices.		records		
waste, recyclable	The excess excavation waste shall be		Records of		
waste, non-	transported and disposed of separately by		complaints		
hazardous waste,	licensed transport vehicles to existing licensed				
etc.)	excavation waste storage area(s), identified				
	by the relevant governmental authorities, in				
	the district/region.				

	On-site storage of wastes prior to final
	disposal (including earth dug for foundations)
	should be at least 300 meters from rivers.
	streams lakes and wetlands
	After each construction site is
	decommissioned, all debris and waste shall be
	cleared.
	Keep the records of waste generation and
	disposal
l l	Manage wastes in accordance with the waste
	• Manage wastes in accordance with the waste
	management hierarchy (prevent, reduce,
	reuse, recycle, recover, dispose) and train
	personnel to raise awareness on waste
	management.
	Temporarily storage on site of all hazardous
	or toxic substances will be in safe containers
	labelled in line with Material Safety Data
	Chest (MCDC), with datails of composition
	properties, and handling information.
	Segregate waste as recyclable, hazardous and
	non-hazardous waste.
	Non-hazardous wastes, inert and
	biodegradable wastes and recyclables must
	he collected separately, and special attention
	must be paid to prevent bazardous wastes in
	look proof contrainer to prevent initiate and
	leaching in case of mixing with other types of
	waste.
	Collect, store and transport waste to
	appropriately designated /controlled licensed
	disposal areas/facilities (such as excavation
	waste storage areas, sanitary landfills.
	recycling/recovery facilities etc.) Submit an
	official letter to IPCU stating that these wastes
	will be acconted at licensed sites
	Iemporary waste storage area (to be
	established at the construction area) should

	be on impermeable ground, covered with a roof, and equipped with a suitable drainage system, proper spill kits and appropriate firefighting equipment. Wastes shall be temporarily stored in this area in separate compartments (labelled with waste codes) according to their types in order not to react with each other. Hazardous wastes shall be stored in the temporary waste storage area for a maximum of six (6) months and non- hazardous wastes for a maximum of one year. Hazardous wastes for a maximum of one year. Hazardous waste shall be transferred to a licensed disposal facility via licensed waste transportation companies, and recyclable wastes to a relevant licensed recycling/recovery facility. All protocols and waste logs shall be submitted to the IPCU. Train workers on correct transfer and handling of fuels and other substances and require the use of gloves, boots, aprons, eyewear and other protective equipment for protection in handling highly hazardous materials.
Stakeholder Engagement and Grievance Mechanism Construction-related complaints and temporary disruption to the local community including eligible property owners	 Follow the relevant measures suggested in the SEP. Early liaison and effective communication shall be carried out with people who may be affected by the work of the contractor and supervision consultant. Implementation of a program of ongoing liaison and respect for the local environment and residences shall be formed The supervision consultant will appoint a dedicated person(s) accountable for community liaison who will be focused on engaging with the community to provide the appropriate information and to be the first

line of response to resolve issues of concern.
The Project Grievance Mechanism shall be
implemented through the opening and closing
of forms and complaints.
The names and contact telephone numbers
and e-mail addresses of all site personnel with
responsibilities for both supervision and
management of the works will be displayed
on the site information boarding.
Once planning consent has been obtained,
formal contact will be established with the
mukhtar of the neighborhood and those who
could potentially be affected by the
construction will be informed via mukhtar.
This will include consultation with relevant
E&S risk management instruments and
identifying any particularly sensitive times of
the day.
Outside normal working hours, security
personnel will act as the main point of contact
via a dedicated phone number. Security will
alert the person(s) accountable for liaison if
necessary (available 24 hours).
All workers will sign/commit to and be trained
on the Code of Conduct to manage the
potential adverse impacts on social cohesion
and Sexual Exploitation and Abuse/Sexual
Harassment (SEA/SH) risks.
Any complaints will be logged, fully
investigated, and responded to quickly,
advising what action has been taken.
Complaints will be registered and reported to
the Contractor, Training Consultant,
Supervision Consultant and IPCU.
Public notice boards will be established at site
entrances providing relevant contact details
of the for liaison including environmental

	matters.					
Labor and Working Conditions: Risks associated with potential labor influx and presence of worker camps (such as accommodation conditions, child labor risks, gender- based violence and harassment, human rights risks, etc.) and other labor issues	 Follow the relevant measures in Labor Management Plan (LM Plan) to be prepared in accordance with project LMP. Workers will be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment such as their rights under national labor and employment law (which will include any applicable collective agreements). Workers will be paid on a regular basis as required by national law and project LMP. Workers will be provided with adequate periods of rest per week, annual holiday and sick, maternity and family leave, as required by national law and project LMP. Workers will receive written notice of termination of employment and details of severance payments in a timely manner. Workers will be employed on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship. Project workers, including specific groups of workers, such as women, people with disabilities, migrant workers and children of working age, will be provided with appropriate measures of protection and assistance in line with ESS2 of KfW/WB ESF. This process will be executed in accordance with the project LMP. Workers can participate, or seek to participate, in workers' organizations and collective bargaining or alternative mechanisms. Children under the minimum age of 18 will 	x	Visual inspection of control measures Health records Employee records Training records Records of worker's complaints	x	Contractor (Implementation) Consultant (Supervision)	

not be employed as engaged by the
not be employed or engaged by the
Contractor in connection with this sub-
project.
Forced labor, which consists of any work or
service not voluntarily performed that is
exacted from an individual under threat of
force or penalty, will not be used in
connection with this sub-project.
A worker's GM will be established by the
Contractor at the construction site for all
workers to raise workplace concerns. Contact
details of the worker's GM will be provided.
All workers will receive training about their
rights under national labor and employment
law and regarding the GM upon recruitment
and before the implementation of the work.
Code of Conduct will be shared with project
workers during employment. All workers are
obliged to comply with the Code of Conduct
and sign relevant documentation at the time
of employment.
Movement in and out of the construction site
will be controlled, and unauthorized access to
the site will be prevented.
Contractor will confirm that workers are fit for
work before they start work, paying special
attention to workers with underlying health
issues or who may be otherwise at risk.
The Contractor shall provide information and
awareness of communicable diseases to
workers.
The Contractor shall arrange safe drinking
water, adequate toilet facilities for both
genders, accommodation, rest and dining
areas for the workers.
The Contractor shall provide a first aid kit with
bandages, antibiotic cream, etc. or health care

	facilities, and shall identify and train an adequate number of workers to provide first aid during medical emergencies.						
Cultural Heritage Chance Find	 Effective communication with local authorities, heritage organizations, and the community will ensure proper handling of any cultural heritage concerns at the beginning of the design stage No disturbance of cultural or historic sites. If encountered with any cultural heritage/assets during construction works (especially excavation and earthworks) apply the chance finds procedure (see ANNEX 13 of ESMF of the project). 	x	×	Chance finds records	×		IPCU Contractor (Implementation) Supervision Consultant (Supervision)
Biodiversity: Potential risks to flora and fauna due to construction activities and improper waste management	 According to Planned Areas Development Regulations (published in the Official Gazette dated July 03, 2017 and numbered 30113 and Attachment: RG-31/12/2022-32060) for residential, trade, tourism, education, worship, health, and sports parcels: 1 tree per 30 m² of area outside the building footprint. If planting on the parcel is not feasible, trees must be planted in designated public areas per zoning plans If trees need to be cut in new resettlement plots, at least two times more than the trees cut will be planted at the site (preferably a site in the nearby region) identified by the General Directorate of Forestry. Creation or enhancement of green spaces, such as parks and green roofs, can provide habitats for urban flora and fauna, contributing to biodiversity in developed areas. Tree planting and the use of fire-resistant native plant species in landscaping projects 	x		Tree plantation records, Screening Visual inspection of control measures		x	Contractor (Implementation) Consultant (Supervision)

	 can mitigate urban heat island effects while supporting ecological functions Nature-based solutions, such as rainwater gardens and permeable surfaces, can reduce runoff, recharge groundwater, and enhance local ecosystems. If asbestos or asbestos containing materials 	
Asbestos Management: Environmental, health and safety risks due to asbestos or asbestos- containing materials	 (ACM) are found at a construction site, they should be clearly marked as hazardous waste and managed according to a comprehensive Asbestos Management Plan (AMP). The AMP should outline detailed procedures for the safe handling, containment, removal, and disposal of ACM, ensuring compliance with local and international regulations. The asbestos should be appropriately contained and sealed to minimize exposure. Prior to removal, if removal is necessary, ACM should be treated with a wetting agent to minimize asbestos dust. If ACM is to be stored temporarily, it should be securely placed inside closed containers and clearly labelled. 	
General for Procuren	ent of Goods and Training	
Community Preparedness Training	 Ensure inclusive participation by conducting consultations with community leaders and vulnerable groups. Provide training materials in accessible formats (e.g., braille, audio, simplified language). Schedule sessions at accessible locations and times to encourage broad participation. Climate change adaptation and emergency preparedness training should be provided. X 	

ANNEX 11 Occupational Health and Safety Plan Outline

The main objective of the OHS Plan is to ensure a safe and healthy working environment through careful planning, routine inspections, safety awareness, training of all personnel, and safety meetings. All contractors shall apply the *Zero Accident Policy*.

Although OHS Plans should be frequently reviewed and updated as needed, incidents, accidents, new methods, and changes in the working environment (new methods, new materials, tools, etc.) are examples of items that must be considered when OHS Plans are reviewed and updated. All workers and subcontractors involved in retrofitting, demolition, reconstruction, or any other activities shall read the appropriate OHS Plan and shall be encouraged to prevent accidents and incidents detrimental to people and the environment.

The items listed below shall be addressed in the OHS Plan:

- Policy, Leadership, Commitment
- Emergency Response Plan
 - The Emergency Response Plan shall outline how to respond to general and sectorspecific emergencies i.e. well blow-out (what phone number to call, whom to contact, how to contact, where to gather, etc.)
- Outline of health and safety issues and goals of the OHS Plan
- Roles and responsibilities (including roles and responsibilities of subcontractors)
- Applicable laws and regulations (6331 Code on OHS Law and relevant regulations)
- Training plan and goals
- Risk analysis and preventive measures
- General health and safety requirements (including instructions, personal protective equipment, work clothes, caution labels, tool inspections, and required qualifications)
- Access to good pads during drilling and testing
- Measures against the infectious disease outbreaks to be integrated into the OHS Plan

Sample Occupational Health and Safety Plan

- 1. Aim
- 2. Scope
- 3. Legal Basis
- 4. Management Commitment and OHS Objectives
- 5. Project Information
 - 5.1. Project Information
 - 5.2. Pre-Construction Information and Layout Plan
- 6. Health and Safety Organization
- 7. OHS Organization Chart
- 8. Business Management
 - 8.1. Workflow Plan
 - 8.2. Methods Statement

9. Identification of Risks and Control Measures

- 9.1. Identification of Risks and Control Measures Affecting the General Construction Site
- 9.2. Identification of Possible Business-Related Risks and Control Measures and
- 9.3. Evaluation of Impact on Third Parties
- 9.4. Risks Arising from Jobs Conflicting in Terms of Time and Space
- 10. Determination of Work Equipment Needs and Qualifications
- 11. Determining the Need for Protective Equipment to be Used at the Construction Site
 - 11.1. Collective Protection Systems and Equipment
 - 11.2. Personal Protective Equipment
- **12. Identification of Risks and Control Measures**
- 13. Lock out Tag out Procedure
- 14. Supervision
- 15. Training of Employees
- **16. Emergency preparedness**
- 17. Accident and Incident investigations
- 18. Employee Health
- 19. Estimated budget

ANNEX 12 Asbestos Management Plan (AMP)

1. Introduction

This document outlines the updated Asbestos Management Plan (AMP), enhanced with insights from regulatory frameworks and best practices in Turkey. The AMP aims to safeguard health and safety during asbestos-related activities, while ensuring compliance with both national and international standards.

2. Regulatory Framework and Guidance

The AMP aligns with the following regulations and standards:

- Asbestos Regulations (Resmi Gazete: 25.01.2013, No:28539)
- EU Directives on hazardous material handling
- NIOSH-NMAM 9002 and HSG 248 standards for asbestos analysis
- Asbestos Management in the Urban Transformation Process guidance by Istanbul Governorship.

3. Asbestos Identification and Risk Assessment

A detailed asbestos survey will be conducted for all buildings constructed before 1999. The survey will include:

- Sampling and testing using PLM and PCM methods
- Documentation of asbestos-containing materials (ACMs)
- Categorization of risks associated with identified ACMs.

4. Mitigation Measures

Mitigation measures will include:

- Safe removal of ACMs by licensed professionals
- Use of personal protective equipment (PPE)
- Containment measures, such as isolation barriers and warning signs.

5. Waste Transport and Disposal

Waste management will adhere to the following protocols:

- Licensed transport of hazardous materials to certified facilities
- Documentation of disposal activities, including transport manifests.

6. Training and Awareness

Training programs will cover:

- Proper handling and removal of ACMs
- Emergency response procedures
- Awareness about health risks associated with asbestos exposure.

7. Monitoring and Reporting

Regular monitoring will be carried out to ensure full compliance with applicable laws and regulations. In alignment with these requirements, the Contractor is responsible for preparing the necessary documentation and completing Table 10: Checklist for Contractors. This checklist, along with supporting documents, must be submitted to the IPCU for review and approval.

- Occupational hygiene asbestos analysis result and report
- Photographic evidence of removal and containment measures
- Asbestos removal expert documentation
- Accreditation and authorization documentations
- Documents regarding agreement with the licensed company and disposal if asbestos is detected

Table 10: Checklist for Contractors

No	Task	Requirement	Compliance Confirmation (Yes/No)	Remarks
1	Conduct pre-removal asbestos survey	Licensed professional	🗅 Yes / 🗅 No	
2	Site Isolation	Complete isolation and placement of warning signs and barriers	🗅 Yes / 🗅 No	
3	Provide sample results to Supervision Consultant and IPCU	Laboratory report submission	🖵 Yes / 🖵 No	
4	Use PPE during removal	Proper use of required equipment	🗅 Yes / 🗅 No	
5	Transport asbestos waste	Licensed transporter	🗆 Yes / 🗆 No	
6	Dispose of waste	Certified facility details	🗅 Yes / 🗅 No	
7	Disposal Documentation	Certificates from disposal facilities	🗅 Yes / 🗅 No	
8	Documented in Waste Log Form ¹⁴	Asbestos Disposal Activities	🗅 Yes / 🗅 No	

 $^{^{14}}$ Please see Waste Management Plan, $\ensuremath{\mathbf{Error!}}$ Reference source not found.

ANNEX 13 Chance Finds Procedures

Cultural heritage encompasses tangible and intangible heritage, which may be recognized and valued at a local, regional, national, or global level. Tangible cultural heritage includes movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Tangible cultural heritage may be in urban or rural settings and may be above or below land or under the water. Intangible cultural heritage includes practices, representations, expressions, knowledge, skills—as well as the instruments, objects, artifacts, and cultural spaces associated with them—that communities and groups recognize as part of their cultural heritage, transmitted from generation to generation and constantly recreated by them in response to their environment, their interaction with nature, and their history.

If during construction, sites, resources, or artifacts of cultural value are found, the following procedures for identification, protection from theft, and treatment of discovered artifacts should be followed and included in standard bidding documents. These procedures consider requirements related to Chance Finding under below mentioned legislations;

1. Law on the Protection of Cultural and Natural Assets (Law No: 2863):

The primary legislation for the protection, registration, and preservation of archaeological sites, historical monuments, and natural heritage.

2. International Conventions on Cultural Heritage Protection:

Türkiye is a party to several key conventions, including:

- UNESCO World Heritage Convention (1972): Protection of cultural and natural properties on the World Heritage List.
- The Hague Convention (1954): Safeguarding cultural property during armed conflicts.
- **Granada Convention (1985)**: Focused on the protection of architectural heritage in Europe.
- Convention for the Safeguarding of Intangible Cultural Heritage (2003).

3. Environmental Law (Law No: 2872):

Includes provisions for the preservation of cultural and natural heritage within the context of environmental protection.

4. Regulations on Archaeology and Historical Artifacts:

- Excavation and Research Regulation: Governs the approval and execution of archaeological excavations and surface surveys.
- Museums and Collections Regulation: Defines rules for the exhibition and preservation of historical artifacts.

5. Zoning Law (Law No: 3194):

Regulates construction activities in protected areas to ensure the integrity of cultural heritage sites.

6. Constitution of the Republic of Türkiye (Article 63):

Mandates the state to safeguard historical, cultural, and natural assets and to take the necessary measures for their protection.

7. Regulation on the Protection of Designated Sites:

Provides detailed guidelines for the identification, registration, and protection of archaeological, urban, natural, and historical conservation sites.

8. Legislation Preventing the Illegal Export of Cultural Assets:

Includes measures under the **Anti-Smuggling Law (Law No: 5607)** to prevent the unauthorized export of cultural heritage.

Given the critical importance of safeguarding cultural heritage during project implementation, the following procedures are designed to ensure compliance with the legislations. These procedures will be integrated into the project's construction and operational protocols to address any chance finds effectively. They align with both national laws and international best practices, ensuring the preservation and responsible management of cultural resources that may be encountered during project activities.

Procedures for Chance Find

A. Stop Construction Activities Immediately:

- Construction work must stop in the area where the find is discovered.
- A safety buffer zone must be established around the site to prevent further disturbance.
- Chance Finds shall be recorded in the Chance Finds Notification Form (see Table 4: Reporting of Chance Finds Notification Form
-). Print copies of Chance Find Notification Forms shall be available on-site, which shall be always scanned once filled in and registered and saved.
- Chance Find Notification Forms shall be updated by the site supervisor, which is recorded in the Chance Finds Log (see Table 5). This document shall be regularly checked.

B. Secure the Site:

- Protective measures must be taken to safeguard the area against theft, vandalism, or further damage.
- If movable objects are involved, the site must be guarded until responsible authorities intervene.

C. Notify Responsible Authorities:

- Inform the Regional Conservation Board / District Municipality /Law enforcement through the IPCU or environmental/social specialists on site.
- The notification should include a description, photos and approximate location of the find.

D. Evaluation and Decision:

- Responsible archaeologists or cultural heritage experts from the regional museum will evaluate the find's significance.
- If the museum archaeologist determines the find/site is of no significance, the site supervisor informs the authorities, and construction may proceed once clearance is granted.
- If the museum archaeologist deems the find/site significant, the museum director decides on further actions, and construction resumes only after the necessary documentation and studies are initiated, completed, and clearance is provided. If deemed significant, appropriate documentation and studies will be initiated.

E. Obtain Clearance:

• Construction can only resume upon written clearance from the Regional Conservation Board after assessing and managing the find appropriately.

F. Detailed Documentation:

- All chance finds must be recorded, including photographs, maps, and descriptions.
- A Chance Find Log must be maintained for audit purposes.
- The details of the responsible individuals and institutions for such cases are outlined in Table 6, which includes the Museum Directorate and the Conservation Board along with their contact details.

Training and Awareness

- Construction personnel must receive training on identifying and safeguarding cultural heritage during construction.
- Clear communication protocols must be established to ensure immediate reporting and compliance with procedures.

Table 4: Reporting of Chance Finds – Notification Form

PART A BÖLÜM A							
Sub-Project Location: Proje Sahası	District (İlçe):		Date: Tarih:			Form No:	Project Information Proje Bilgisi
Name of person reporting chance find: Rastlantısal buluntuyu rapor eden kişinin ismi	,		1				I
Was work stopped in the immediate vicinity o Rastlantısal buluntu tam çevresinde iş durduru	f the chance find? □ Yes Ildu mu? Evet Hayır	□ No					
Was a buffer zone created to protect the chan Rastlantisal bulguyu korumak için tampon bölg	ce find? Yes No ge oluşturuldu mu? Evet	Hayır					
NOTIFICATION BILDIRIM							
Site manager and E&S manager contacted Saha Müdürü ve Çevre Müdürü ile irtibata geçi	□ Yes □ No ildi Evet Hayır						
CHANCE FIND DETAILS ŞANS BULGU AYRINTILARI							
GPS coordinates GPS koordinatları			Photo record (HD kalitesinde –c If not, explain wh Değil ise nedenini Other records Specify (drawings Diğer kayıtlar Belirtin (çizimler, l	Hayır cep telefonu y: i açıklayınız □ Yes 5, HD quality Evet HD kalite vid	□ Yes fotoğrafı değil) □ No videos, etc.): Hayır eolar, vb.)	□ No (HD quality –	no cell phone photos) <i>Fotoğraf kaydı Evet</i>
Description of chance find: Rastlantisal bulgunun tanımı							
Description of site/finding and other specificat watercourse, etc.) Sahanın / bulgunun ve saha/bulgunun diğer öz	ions of site/finding: (e.g. surfac elliklerinin tanımı: (örn. Yüzey s	e sediment type ediman türü, yü	e, ground surface vi izey zemin görünürl	isibility, dista lüğü, en yakı	nce to closest n suyoluna olan	mesafe, vb.)	

PART B BÖLÜM B					
	NOTI	FICATION OF MU MÜZE MÜDÜF	SEUM DIRECTORATE RLÜĞÜ ARKEOLOĞUN	ARCHAEOLOGIST A BILDIRI	
Monitoring archaeologist contacted museum directorate archa	eologist		□ No		
İzleme arkeoloğu, müze müdürlüğü arkeoloğu ile irtibata ge Date of notification:	eçti.	Evet	Hayır		
Bildirim tarihi					
Name of museum directorate and name of museum archaeolo	ogist:				
number of museum directorate archaeologist:					
Müze müdürlüğü arkeoloğunun iletisim numarası					
	DECISION			DI OGIST MÜZE	
	M	ÜDÜRLÜĞÜ ARKI	ELOĞUNUN KARARI		
Date of site visit: Saha ziyaret tarihi:					
□Site/Finding of no significance - Construction to proceed wi	th no further action –	End	Site/Finding	g of significance - Further actions required	
of a chance find the procedure			Önemli Saha —	Bulgu - Ek araştırma gerekmektedir	
Önemsiz Saha – Bulgu - daha fazla araştırma yapılmadan			Please Fill out	Part C	
Inşaat aevam eallebilir – Kastlantisal bulgu proseaurun sonu. Date of notice to resume work:			Lütfen Bölüm (ĩ yi doldurun.	
lse devam etme tarihinin bildirisi					
Name of museum directorate archaeologist					
Müze müdürlüğü arkeoloğunun ismi					
Contact information:					
İletişim numarası					
Site manager and E&S manager contacted	🗆 Yes	🗆 No			
Saha Müdürü ve E & S müdürü ile irtibata geçildi	Evet	Hayır			
PART C					
BOLUM C		FURTUE			
		FURTHE EK S	R FIELD INVESTIGATI SAHA ARAŞTIRMASI	UN	
□ Site/Finding of minor significance	🗆 Site,	/Finding of mode	rate significance	□ Site/Finding of high significance	
Az önem taşıyan saha/bulgu	Orta dere	ecede önemli sah	a/bulgu	Çok önemli saha/bulgu	
Describe additional work to be conducted.				·	
Yapılması gereken ek islerin tanımı					

Istanbul Resilience Project

Date started: *Başlangıç tarihi*

Date of notice to resume work *İşe geri dönme tarihi bildirisi*

Name of museum directorate archaeologist: *Müze müdürlüğü arkeoloğunun ismi:*

Contact information: İletişim numarası

Date completed: *Bitiriş tarihi*

Construction manager contacted	🗆 Yes	🗆 No
İnşaat müdürü ile irtibata geçildi	Evet	Hayır

Table 5: Chance Finds Record

DATE OF FIND	BRIEF DESCRIPTION OF THE CHANCE FIND	NAME OF AUTHORİZE D STAFF HAS BEEN	ACTIO N TAKEN	CHANCE FIND NOTIFICATION COMPLETE	STATUS OPEN OR CLOSED	OTHER CONSIDERATIONS
Table 6: Contact Information

MUSEUM DIRECTORATE	ADDRESS	TELEPHONE	FAX	E-MAIL

CONSERVATION BOARD	AREAS OF RESPONSIBILITY	ADDRESS	TELEPHONE	FAX	E-MAIL

ANNEX 14 Community Safety and Traffic Management Plan Outline

Major community health and safety issues in sub-projects involving <u>construction and reconstruction</u> <u>activities</u> are i) noise and dust; ii) work site safety; iii) emergencies; and iv) traffic safety. **Error! Reference source not found.** introduces general guidelines for the preparation of a Community Safety and Traffic Management Plan. The main objective of the plan is to ensure the safety and health of the community through careful planning, routine inspections, awareness, and training of the community during project development, exploration/drilling and to reduce risks associated with motor vehicle travel and to define practical actions which can be put in effect to mitigate road safety risks. The <u>construction and</u> <u>reconstruction activities</u> may require detailed planning depending on site-specific issues. Each Contractor must prepare Contents of a Sample Community Safety and Traffic Management Plan. The items listed below shall be addressed in each plan:

- Policy, Leadership, Commitment.
- Outline of health and safety issues and goals of the plan.
- Roles and responsibilities (including roles and responsibilities of subcontractors).
- Applicable laws and regulations.
- Training plan and goals.
- Risk analysis and preventive measures against below topics:
 - > Pandemic/epidemic diseases
 - > Release of pollutants and dust emissions into ambient air
 - > Excessive noise
 - Excessive or unregulated vehicle traffic near the sub-project site and through communities at inappropriate times (e.g. children going to school) due to the movement of trucks and other vehicles and machinery to and from the plant
 - Ensuring the driver is properly licensed for the class of a vehicle and free from fatigue, drug, or alcohol impairment.
 - Driving with care at appropriate speeds for road conditions, ensuring all occupants fasten seatbelts.
 - Avoiding the use of all mobile communication devices and other driver distractions, while using any project related leased vehicle on company time
 - > Designating safe areas while working around moving vehicles
 - Exposure to hazardous substances
 - > Exposure to project-related emergencies (accident, fire, explosion, etc.)
 - > Improperly controlled or trained security guards
 - > Unresolved problems due to the absence of an external grievance mechanism
 - Placement of access deterrents, such as fences and warning signs, to prevent access and warn of existing hazards.

SAMPLE COMMUNITY SAFETY AND TRAFFIC MANAGEMENT PLAN OUTLINE

1. PURPOSE AND SCOPE OF THE PLAN

1.1 Overlaps with Other Management Plans

2. BACKGROUND POLICIES AND STANDARDS

2.1 National standards and regulations

- 2.2 International standards
- 2.3 Source documents

3. ROLES AND RESPONSIBILITIES

- 3.1 Construction Contractors
- 3.2 Supervision Consultant
- 3.3 IPCU
- 4. MANAGEMENT METHODS AND MITIGATION MEASURES
- 5. MONITORING
- 6. AUDIT AND REVIEW
- 7. REPORTING
- 7.1 Audit reports (by Supervision Consultant)
- 7.2 Contractor Monitoring Report

ANNEX 15 Waste Management Plan

Purpose and Scope

The Waste Management Plan is developed to establish the primary requirements associated with waste management in compliance with national legislation and the World Bank Environmental and Social Framework (ESF), including its Environmental and Social Standards (ESSs). This plan applies to the construction phase and operational activities of the project.

Throughout the project's lifecycle, various types of waste and materials will be generated from different sources and activities. The purpose of this plan is to ensure the appropriate collection, segregation, storage, handling, transportation, and disposal of both non-hazardous and hazardous wastes in a manner that minimizes impacts on human health and the environment, while optimizing the reuse and recycling of valuable materials.

This plan complies with:

- National legislation and relevant regulations on waste management.
- World Bank ESS3 on Resource Efficiency and Pollution Prevention.
- Good International Industry Practices (GIIPs).

The Waste Management Plan will be implemented alongside related management plans and programs, including:

- The Environmental and Social Management Plan (ESMP).
- Labor Management Procedures (LMP).
- Community Safety and Traffic Management Plan.
- Stakeholder Engagement Plan (including grievance mechanisms).

This Plan is a dynamic document, subject to periodic updates to reflect changes in regulations, project requirements, or improvements in industry standards.

5.1 Legislative Requirements and Standards

5.1.1 National Legislation

The Environmental Law (No. 2872), which was published in the Official Gazette No. 18132 dated August 11, 1983, provides the legislative framework for the regulation of industries and their potential impact on the environment. Industrial projects are subject to varying levels of review that begin while projects are in the development phase. Additional regulations apply to facilities once they are in operation.

The Environmental Law authorized the promulgation of several regulations. Those that pertain to waste management and the Project must comply with are described below.

5.1.2 Regulation on Waste Management

The Regulation on Waste Management is the implementing legislation aimed at aligning with the EU Waste Framework Directive. The Regulation was published in the Official Gazette No. 29314 dated April 2, 2015.

The Regulation on Waste Management provides a single comprehensive framework for waste management. As of April 2015, it repealed and replaced the Regulation on Solid Waste Management and the Regulation on General Principles of Waste Management. As of April 02, 2016, it also repealed and replaced the Regulation on Control of Hazardous Wastes.

Article 9 of the Regulation stipulates the responsibilities of the waste generators and waste owners, including:

- Implementation of necessary measures to minimize waste generation;
- Preparation and submission of waste management plan regarding generated wastes (with prevention and minimization measures);
- Declaration of annual waste generation via the web-based system of the Ministry of Environment, Urbanization and Climate Change and use of National Waste Transport Form for wastes that require its use (template is provided in Annex 9-A of the Hazardous Waste Control Regulation which is repealed and replaced by Regulation on Waste Management).

5.1.3 Regulation on Control of Excavation, Construction, and Demolition Wastes

Regulation on Control of Excavation, Construction and Demolition Wastes was published in Official Gazette No. 25406 dated March 18, 2004. Articles 10, 34, 35, 36, 37, 38, 39, 40, 41, and 42 regarding the storage of the wastes were repealed by the Landfill Regulation published in Official Gazette No.27533 dated March 26, 2010.

This regulation aims to set the principles and procedures to minimize excavation, construction, and demolition waste at the source of generation, as well as to collect, temporarily store, transfer, recycle, reuse, and dispose of waste, in an environmentally sound manner.

By Article 9 of the regulation; excavation, construction, and demolition generating facilities are obliged to implement waste management in a way that will minimize the adverse effects of waste on the environment and human health. The facilities must acquire the necessary permissions that concern the generation, transportation, and storage operations of waste. The facilities are not allowed to dump construction wastes on the sites/locations and facilities other than the permitted ones by the municipal or other authorities.

The regulation also stipulates that the project owner is responsible for taking precautions to minimize noise impacts, visual impacts, and dust emissions during the removal of excavation material. The operation area must also be enclosed. In addition, planning should be one in a way that the amount of excavated soil is equal to the filling volume. Excavated soils must be utilized within the operation area to the extent possible.

5.1.4 Packaging Waste Control Regulation (PWCR)

PWCR was published in the Official Gazette No. 28035 dated August 24, 2011, and also updated and published in the Official Gazette No: 31523 dated June 26, 2021. The regulation aims to;

- Provide certain environmental criteria, requirements, and characteristics for packaging production,
- Prevent direct and indirect disposal of packaging wastes causing environmental damage, and
- Prevent and minimize the generation of package waste through reuse, recycling, and recovery methods.

PWCR states that the packaging wastes should be collected and stored separately from other wastes at the source to ensure their disposal without causing any environmental damage; to reduce environmental pollution; to benefit from the landfills at maximum levels; and to contribute to the economy.

Packaging waste-generating parties located in the boundaries of municipalities that conduct separate collection at source are obliged to deliver the packaging wastes to the responsible municipalities or their contracted and licensed collection/separation entities.

5.1.5 Waste Batteries

Waste Batteries and Accumulators Control Regulation was published in Official Gazette No. 25569 dated August 31, 2004. The purpose of this Regulation is;

- Arrange legal and technical principles for the development of policies and programs for batteries and accumulators from their production to their final disposal,
- Ensure production of batteries and/or accumulators with certain criteria and basic conditions and characteristics in terms of the environment,

•

- Prevent discharge to the receiving environments,
- Ensure technical and administrative management standards are in place, and
- Establish a collecting system for the recovery and final disposal of used batteries and accumulators.

According to the Regulation, battery, and accumulator consumers are obliged to;

- Collect used batteries separately from household wastes,
- Deliver used batteries to the collection points established by municipalities or enterprises that are engaged in the distribution and sales of battery products,
- Deliver the old accumulators to the temporary storage facilities established by the enterprises engaged in the distribution and sale of accumulator products and enterprises operating vehicle maintenance/ repair sites (accumulators cannot be delivered over 90 days once they are out of use),
- Pay a deposit if a new accumulator is to be purchased when delivering the old one and
- Ensure impervious ground and other required conditions are met for the temporary storage sites where batteries and accumulators will be stored,

5.1.6 Waste Oils Management Regulation (WOMR)

WOMR was published in the Official Gazette No. 26952 dated June 30, 2008, and also updated and published in the Official Gazette No. 32071 dated January 12, 2023. The purpose of the WOMR is:

- To prevent direct and indirect disposal of waste oils in the environment;
- To ensure temporary storage, transportation, and disposal thereof without causing harm to the environment and human health;
- To set up necessary technical and administrative standards in the management of waste oils;
- To determine the required principles and programs to establish temporary storage, handling, and disposal facilities;
- To manage these facilities in an environmentally friendly manner.

According to Article 9 of WOMR, waste oil producers are obliged to take the required measures to minimize the generation of waste oils, including waste motor oils and residues resulting from the processing of waste oils. Waste oil producers must conduct waste oil analyses and declare generated amounts to the Ministry of Environment, Urbanization, and Climate Change. Waste oil from different categories should not be mixed with other hazardous wastes.

Waste oil producers shall comply with the provisions of the Regulation on Waste Management for disposal. All records including waste oil declaration forms and analysis reports are required to be kept for at least five years. To transport waste oils, the regulations that will be determined by MoEUCC shall be complied with.

Waste oil is required to be collected in red colored tanks/containers with a label of "Waste Oil" on it as stated in Annex 5/Article 5.1.6. The containers are placed in storage with provisions for protection from rain, as well as the impermeable ground (a thickness of at least 25 cm and covered by epoxy, geo membrane, and similar insulation materials).

5.1.7 Regulation on Control of Waste Electrical and Electronic Equipment

The regulation was published in the Official Gazette No. 28300 dated May 22, 2008, and also updated in the Official Gazette No: 32055 dated December 26, 2022. One of the main purposes of the Regulation is to identify the methods and targets regarding the minimization of electrical and electronic waste generation through reuse, recycling, and recovery.

5.1.8 Regulation on General Principles of Waste Pre-treatment and Recycling Facilities

The regulation was published in Official Gazette No. 31623 dated October 09, 2021. It is to determine the procedures and principles regarding the technical criteria of the waste pre-treatment and recovery facilities operating for the processing of wastes and the minimum requirements to be found in these facilities.

5.2 Requirements of IFI ESF

5.2.1 Resource Efficiency, Pollution Prevention, and Management ESS3

ESS3 recognizes that economic activity and urbanization often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services, and the environment at the local, regional, and global levels. The current and projected atmospheric concentration of greenhouse gases (GHG) threatens the welfare of current and future generations. At the same time, more efficient and effective resource use, pollution prevention, GHG emission avoidance, and mitigation technologies and practices have become more accessible and achievable.

This ESS sets out the requirements to address resource efficiency and pollution¹⁵ prevention and Management¹⁶ throughout the project life cycle consistent with Global International Industry Practice (GIIP).Resource Efficiency and Pollution Prevention and Management Standard's objectives are provided below:

- To promote the sustainable use of resources, including energy, water, and raw materials.
- To avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities.
- To avoid or minimize project-related emissions of short- and long-lived climate pollutants.
- To avoid or minimize the generation of hazardous and non-hazardous waste.

¹⁵ The term "pollution" is used to refer to both hazardous and nonhazardous chemical pollutants in the solid, liquid, or gaseous phases, and includes other components such as thermal discharge to water, emissions of shortand long-lived climate pollutants, nuisance odors, noise, vibration, radiation, electromagnetic energy, and the creation of potential visual impacts including light.

¹⁶ Unless otherwise noted in this ESS, "pollution management" includes measures designed to avoid or minimize emissions of pollutants, including short- and long-lived climate pollutants, given that measures which tend to encourage reduction in energy and raw material use, as well as emissions of local pollutants, also generally result in encouraging a reduction of emissions of short- and long-lived climate pollutants.

• To minimize and manage the risks and impacts associated with pesticide use.

5.2.2 European Union (EU) Legislation

Directive 2008/98/EC (the Waste Framework Directive) provides general provisions for waste management and sets the basic waste management definitions. It requires that waste is managed without endangering human health and harming the environment, and in particular without risk to water, air, soil, plants, or animals, without causing a nuisance through noise or odors, and without adversely affecting the countryside or places of special interest. The Directive amended the former EU directive on waste, hazardous waste, and waste oils and is currently covering all wastes identified by Decision 2000/532/EC (i.e. the European Waste Codes).

To harmonize Turkish environmental protection standards with the EU's Waste Framework Directive (2008/98/EC) and the European Commission Decision establishing a list of waste (2000/532/EC), the Turkish MoEUCC adopted a new regulation on waste management that will significantly affect companies that produce waste in Türkiye. Waste management implementing legislation aimed at aligning with the Waste Framework Directive was adopted in 2015. Currently, waste codes provided in Annex 4 of the Turkish Regulation on Waste Management are entirely the same as the European Waste Codes.

5.3 Roles and Responsibilities

Roles and responsibilities for Environmental and Social (E&S) management for the Project are described in detail in the Project ESMF. Within this scope, roles and responsibilities regarding waste management are provided in **Error! Reference source not found.**.

Roles	Responsibilities		
	• Ensure adequate resources are provided for the implementation of this		
10011	Plan.		
IPCU	 As required, review and update the Plan 		
	 Incorporate waste minimization strategies into project designs. 		
	 Identify hazardous materials and recommend safe handling or 		
	replacement solutions		
Design Consultant	Specify recyclable or sustainable materials to minimize environmental		
	Impact.		
	Collaborate with contractors to align construction practices with waste management objectives		
	• Ensure technical support is provided to the Contractor for the		
	implementation of the Plan.		
	 Ensure related trainings are provided by the Contractor, through a 		
Supervision Consultant	review of training records and related training documents.		
	 Oversee Contractors' HSE compliance with Project requirements 		

Table 7: Roles and Responsibilities

	through Contractor monitoring and reports.		
	 Ensure this plan is implemented in line with Project standards 		
	 The main responsibility for ensuring the implementation of the Plan 		
	(including by the Sub-Contractors if any) and reporting non- compliances		
	and implementation performance of the Plan to the supervision		
	consultant.		
	 As required (e.g. in the case compliance is identified, a change in 		
	applicable legislation occurs, etc.), participate in the development of		
	corrective and/or enhancement actions.		
Contractors	 Provide related trainings. 		
	 Conduct internal audits and daily inspections and record identified in 		
	compliance.		
	 Ensure related non-compliances are recorded and responded to 		
	immediately.		
	 As required, review and update the Plan (in coordination with the 		
	supervision consultant).		
	 Ensure waste management issues are included in the daily checklist to 		
	be integrated into the monthly report to be submitted to IPCU.		
	 Participate in trainings required for waste management. 		
All personnel	 Ensure self-competency in terms of the implementation of this plan. 		

5.4 Waste Management

5.4.1 Waste Management Approach

Turkey's Regulation on Waste Management (2015) establishes a waste hierarchy that prioritizes environmentally favorable waste management practices, forming the basis for national legislation and policies. Similarly, the EU's Waste Framework Directive (Directive 2008/98/EC) adopts this hierarchy as a foundational approach for applicable waste legislation and policy. This hierarchy will also guide the Project's waste management strategy. Accordingly, waste management will be implemented in the following order of decreasing preference:



In order to minimize and appropriately manage the waste generated on-site, the following good management practices will be used:

- Reduction of waste generation (through management practices, avoiding or decreasing materials use, etc.) is the primary goal of this plan.
- Non-hazardous wastes will be segregated from hazardous wastes.
- Recycling of wastes will be mandatory throughout all Project activities and related trainings will be provided.
- All waste management activities, including the segregation of wastes by type for delivery to licensed recycling or recovery firms, will be documented and regularly reviewed to ensure compliance with project requirements and relevant regulations.
- An effort will be made to minimize the number of hazardous materials used.
- Contractors must designate an environmental engineer and at least one responsible personnel for the waste site at the construction site, provide their contact details to the IPCU, and ensure that all personnel handling hazardous materials and wastes are properly trained in their handling and management.
- Spills of hazardous materials will be prevented through careful and sensible management of the materials. An emergency response plan will be established for waste-related incidents, including procedures for containment and clean-up of hazardous spills.
- Where possible, non-hazardous alternatives will be used in place of hazardous materials.
- Regular inspections of storage areas will be conducted. If damaged or leaking containers are detected, they will be replaced.
- Preventive maintenance will be performed on equipment to avoid potential spills.
- Waste storage areas will have secondary containment or spill trays.
- Under no circumstances, waste will be disposed of on-site.
- Stakeholder engagement and awareness will be fostered to ensure effective implementation of waste management practices.
- To ensure resilience against climate and disaster risks, waste storage and management processes will incorporate the following measures:
- Waste storage areas will be located outside flood prone zones and designed to withstand extreme weather conditions.
- Fire suppression systems, including chemical extinguishers for hazardous materials, will be installed.

• Temporary waste management protocols for disaster scenarios will be established to address emergency needs effectively.

5.4.2 Classification of Wastes Generated During Project Activities

The Project activities will lead to the generation of various non-hazardous and hazardous wastes.

5.4.2.1 Non-Hazardous Wastes

Typical non-hazardous wastes are given below;

- Domestic waste (e.g., food scraps, household items),
- Recyclable wastes such as paper, glass, metals, wooden waste, trees, tin cans, textiles, etc.,
- Packaging waste (e.g., cardboard, plastics, composite materials),
- Waste tires, and
- Excavation waste such as soil, rocks and construction debris, etc.

5.4.2.2 Hazardous Wastes

Different types of hazardous wastes, that may potentially be generated as a result of the project activities, are given below:

- Asbestos-containing materials (ACM) will be managed in accordance with a dedicated Asbestos Management Plan,
- Waste batteries and accumulators,
- Waste vegetable oil,
- Medical waste,
- Waste oil generated from equipment and vehicle maintenance, such as engine oil, hydraulic fluids, and transformer oil,
- Waste paint, thinner related wastes,
- Other hazardous waste related to operation and maintenance (O&M) activities such as broken lighting fixtures, cables, and insulation materials that may contain heavy metals, and
- Contaminated materials, including containers and materials that have been in contact with hazardous substances.

5.4.3 Implementation

The Istanbul Project Coordination Unit (IPCU) requires all contractors to register with the Ministry of Environment, Urbanization, and Climate Change EÇBS (Entegre Çevre Bilgi Sistemi)17 for the transport and disposal of hazardous waste. This registration must be completed by the contractor within one month following the contract signing. All hazardous waste-related operations, including declarations,

¹⁷ The Entegre Çevre Bilgi Sistemi (EÇBS), or Integrated Environmental Information System, is an online platform developed by Turkey's Ministry of Environment, Urbanization, and Climate Change. It centralizes environmental compliance processes, including waste management, environmental permits, emissions monitoring, and more. Businesses and facilities use EÇBS to report, track, and fulfill legal environmental requirements.

transport, and disposal, must be carried out exclusively through the MoTAT system to ensure compliance with legal and environmental standards. Documentation related to these processes should be provided to IPCU for monitoring purposes and included in the monthly progress report appendices.

To maintain traceability and accountability, all waste transactions must be documented in EÇBS, including the use of licensed transporters and disposal facilities, the issuance of transport forms (TATF), and disposal certificates. Contractors are responsible for ensuring that all required records are properly maintained for a minimum of five years. Detailed requirements and key considerations for the management, transport, and disposal of hazardous waste are provided in the relevant sections below. These measures ensure alignment with national regulations, promote environmental protection, and enable effective oversight by IPCU.

5.4.3.1 Waste Collection, Storage, Transportation and Disposal

In compliance with applicable legal requirements, a comprehensive waste management plan covering both hazardous and non-hazardous wastes will be prepared and submitted to the Istanbul Project Coordination Unit (IPCU) for review and approval. This plan will ensure that all project activities align with the Regulation on Waste Management (2015) and other relevant regulations. All wastes will be managed in accordance with the following principles:

- a. Wastes will be segregated at the source to facilitate recycling and safe disposal.
- b. Temporary storage of wastes will be carried out in designated, secure areas that are clearly marked and protected from environmental factors.
- c. Transportation of wastes will only be conducted by authorized firms with valid licenses, ensuring compliance with national regulations.
- d. Disposal of all waste types will be performed at facilities licensed by the relevant authorities, ensuring environmental and human health protection.
- e. Asbestos-containing materials (ACM) will be managed in line with the Asbestos Management Plan, which provides detailed procedures for the safe handling, storage, transportation, and disposal of such materials to prevent exposure and health risks.

5.4.3.2 Collection, Segregation and Storage

To ensure proper waste management, the following procedures will be implemented:

- Designated Storage Areas: Separate, secured, and clearly marked storage areas will be allocated for hazardous and non-hazardous wastes to prevent cross-contamination and ensure safety. These storage areas will be adequately sized to accommodate the volume of waste generated and will be equipped with fire extinguishers suitable for chemical fires to address potential fire risks.
- b. Waste Containers: Suitable containers, appropriate to the type of waste, will be provided at waste generation points. Containers will be labeled and appropriate colored to identify their contents and prevent mishandling. Asbestos-containing materials (ACM) will be stored in line with the Asbestos Management Plan.
- c. **Regular Inspections:** Storage areas will be regularly inspected to ensure compliance with safety

and environmental standards, and any damaged or leaking containers will be replaced immediately.

d. **Training and Awareness:** Personnel involved in waste handling will be trained on proper segregation, storage, and transportation practices to ensure compliance with the project's waste management plan.

Non-Hazardous Wastes

Management of non-hazardous wastes will adhere to the following procedures:

Domestic Wastes:

- Domestic wastes will be collected in designated trash bins and temporarily stored onsite in compliance with the Regulation on Waste Management (2015) and Packaging Waste Control Regulation (2020).
- Regular collection and removal schedules will be established to prevent accumulation and pest infestations.

Recyclable Wastes:

- Recyclable materials, such as paper, glass, and metals, will be segregated at the source and stored temporarily in clearly marked areas dedicated to recyclable wastes.
- Transportation of recyclable wastes to related district municipalities/licensed recycling facilities will be prioritized.
- Packaging wastes will be collected separately and stored temporarily onsite in designated areas in compliance with Regulation.
- Proper labeling of packaging waste storage areas will ensure alignment with regulatory requirements.

Waste Containers and Labeling:

- Suitable waste containers will be provided at each waste generation point to facilitate safe and environmentally sound temporary storage.
- All containers will be clearly labeled and colored according to their contents (e.g., domestic waste, recyclable materials, packaging waste) to prevent mismanagement and cross-contamination.

Periodic Monitoring and Reporting:

- Waste management practices will be monitored periodically, and any non-conformities will be documented and addressed immediately.
- A reporting system will be established to track waste generation, storage, and disposal activities.

Hazardous Wastes

• The management of hazardous wastes will adhere to both national and international standards, ensuring safe handling, storage, and disposal practices throughout the Project. The following procedures will be implemented:

Storage of Hazardous Wastes:

- Hazardous wastes will be stored in non-damaged, leak-proof, secure, and appropriately sized containers to suit the type and volume of waste.
- Containers will be placed in dedicated storage areas designed to isolate the wastes from the environment and human activities, ensuring no adverse effects on human health or the environment.
- Storage areas will provide facilities to protect wastes from seasonal weather conditions, such as rain or extreme heat, to maintain the structural integrity of the wastes.
- Secondary containment systems (e.g., spill trays or containment barriers) will be installed in hazardous waste storage areas to capture and contain any potential spills or leaks. In accordance with the emergency response plan, waste-related incidents, including the containment and clean-up of hazardous spills, will be managed effectively.

Labeling and Identification:

- All waste containers will have clear and accurate labels, detailing the type of waste, classification/category, volume, Material Safety Data Sheet (MSDS), and required Personal Protective Equipment (PPE).
- Unidentified wastes will be treated as hazardous by default.
- Old or incorrect labels will be removed or covered to avoid mismanagement.

Access Control and Security:

- Waste storage areas will be designed to prevent unauthorized access and will include locking mechanisms to ensure security.
- Only trained and authorized personnel will have access to hazardous waste storage areas.

Regular Inspections:

- Hazardous waste containers will be inspected regularly for signs of damage, leakage, or other risks. Damaged containers will be replaced immediately.
- Spillages will be addressed promptly using absorbent materials, and contaminated materials will be managed as hazardous waste.

Safe Handling Practices:

- Containers will always be kept closed to prevent accidental spills or reactions.
- Wastes will be stored in a manner that prevents chemical reactions, including maintaining appropriate separation distances between incompatible materials.

Machinery Maintenance Waste:

- Maintenance of vehicles and construction machinery (e.g., oil changes, battery replacements) will primarily occur off-site at licensed service providers.
- If on-site maintenance is unavoidable, designated areas with appropriate drainage and impermeable surfaces will be used to prevent soil contamination.
- Absorbent materials will be placed under vehicles during maintenance activities, and any contaminated soil will be stripped and managed as hazardous waste.

Waste Oil Management:

• Waste oils will be segregated by category and temporarily stored in labeled containers on

impermeable surfaces, in line with the Waste Oil Management Regulation.

- Waste oils of different categories will not be mixed, and all storage containers will bear a "Waste Oil" label.
- Discharge of waste oils into sinks, drains, or natural environments is strictly prohibited.

Vegetable Oils:

• If meals are prepared and served to workers at the construction site, waste vegetable oils will be collected and temporarily stored in special containers, ensuring compliance with relevant regulations.

Toner Waste:

• Used toner cartridges from site office printers and copiers will be collected in dedicated containers clearly labeled as "Toner Waste" and stored temporarily in an easily accessible and secure location within the site office.

Electronic Waste:

• E-waste, including damaged or obsolete electronic equipment such as computers, monitors, and printers, will be collected and stored separately in secure and weather-resistant storage areas.

Batteries and Accumulators:

• Waste batteries and accumulators will be collected and stored separately in compliance with the Waste Batteries and Accumulators Control Regulation, with a dedicated collection box placed in an easily accessible location within the site office, clearly labeled as "Waste Battery Collection Box."

End-of-Life Tires:

• Changed tires from vehicles or construction machinery will be stored in designated areas, in line with the End-of-Life Tires Control Regulation.

Explosives (If Applicable):

• While the Project does not require the use of explosives, any waste explosives will be stored in their original containers, marked as "Explosive Waste," and managed by licensed firms.

Training and Awareness:

• Personnel handling hazardous wastes will be trained on proper handling, storage, and emergency response measures to ensure safe practices across all Project activities.

Compliance with Regulations:

• All hazardous waste management activities will comply with Turkey's relevant regulations, including the Regulation on Waste Management, and adhere to EU directives where applicable.

5.4.3.3 Transportation and Disposal

Non-Hazardous Wastes

The following management controls will be implemented for the transport, recycling, recovery, and disposal of non-hazardous wastes:

A protocol will be signed with the related municipality for the transfer of domestic wastes to a sanitary landfill.

- Agreements will be signed with licensed firms for the transport of segregated recyclable and packaging wastes, ensuring compliance with the Packaging Waste Control Regulation.
- Excavation waste that cannot be reused on-site will be transported to excavation, construction, and demolition disposal areas approved by the respective municipality. This process will adhere to the Excavation, Construction, and Demolition Waste Control Regulation.

Agreements between the Contractors and licensed waste facilities must be annexed to their Management Plan (MP) for reference and submitted to the IPCU as an appendix to the monthly reports.

Hazardous Wastes

• The following management controls will be implemented for the transport, reuse, recovery, recycling, and disposal of hazardous wastes:

Transportation and Disposal of Hazardous Wastes:

- Hazardous wastes will be transported off-site when on-site storage nears maximum capacity.
- Wastes will be securely packed, labeled, and accompanied by appropriate documentation to ensure safe transport to approved disposal facilities, minimizing risks to handlers and the environment.

Batteries and Accumulators:

• Separately collected waste batteries and accumulators will be delivered to collection points established by recovery enterprises, distribution and sales firms, or municipalities, in compliance with the Waste Batteries and Accumulators Control Regulation.

Waste Tires:

• Waste tires will be transported to licensed facilities for recycling, reuse, or energy recovery, following the End-of-Life Tires Control Regulation.

Medical Waste:

• While the project does not anticipate the generation of medical waste, if required, medical waste will be delivered to nearby healthcare facilities or licensed medical waste disposal firms under the supervision of the workplace doctor, as per national regulations.

Waste Oils:

- Waste oils will be transported by licensed transporters to licensed processing and disposal facilities.
- The National Transportation Form will be completed before transportation, and the Waste Oil Declaration Form will be submitted to the relevant authorities annually, as required by the Waste Oil Management Regulation.

Toner Waste:

• Toner waste will be transported by licensed transporters to authorized recycling or disposal facilities in compliance with relevant regulations.

Vegetable Oils:

• Waste vegetable oils collected in special containers will be sent to licensed companies for reuse or recovery.

Asbestos-Containing Materials (ACM):

• ACM will be managed according to the Asbestos Management Plan, which includes detailed

procedures for safe handling, secure packaging, and transportation to approved disposal facilities. Licensed firms will handle all aspects of ACM management to prevent exposure risks to workers and the public.

Other Hazardous Wastes:

• Licensed disposal facilities will be used for the transfer and disposal of other hazardous wastes, ensuring compliance with relevant regulations.

Documentation and Agreements:

• Agreements between the Company and licensed hazardous waste facilities will be annexed to this Management Plan (MP) for transparency and accountability.

5.5 Monitoring and Reporting

The waste types, quantities, and classifications will be systematically recorded and monitored to ensure compliance with this plan and relevant regulations. The following procedures will be implemented: **Monthly Waste Records:**

• Records of all waste types, from generation to their final destination, will be maintained. A sample waste log form is provided in **Error! Reference source not found.**.

Annual Waste Declarations:

 Waste declaration forms will be submitted annually using the online system of the Ministry of Environment, Urbanization, and Climate Change (MoEUCC) at <u>http://online.cevre.gov.tr</u>. These forms, along with National Waste Transport Forms, will be retained on-site for a minimum of 5 years.

Daily Inspections:

- Daily inspections of on-site waste management practices will be conducted during both construction and operation phases. A sample checklist for inspection items is included in Table
 9: Waste Management Inspection Checklist
- •

Quarterly Internal Audits:

• Internal audits will be performed quarterly during the construction phase to identify areas for improvement.

Reporting to Stakeholders:

 Inspection and monitoring results will be reported to the supervision consultant, Provincial Directorate of Environment, Urbanization, and Climate Change (PDoEUCC), and the World Bank within the scope of biannual reporting.

Corrective and Preventive Actions:

• Based on monitoring and audit results, corrective and/or preventive actions will be designed and implemented. The performance of these actions will be tracked, monitored, and reported to ensure continuous improvement.

5.6 Training

Effective waste management training is critical to ensure the successful implementation of this plan. The following training measures will be implemented:

General Training:

• Contractors will provide sufficient training to all personnel, including sub-contractors, to ensure awareness of relevant aspects of this plan, related legislation, standards, and general waste management practices (e.g., waste segregation, tidiness).

Specialized Training:

• Personnel working routinely with hazardous wastes will receive specialized training on handling, segregation, labeling, storage, spill response, and disposal requirements.

Training Records:

• Training sessions will be documented, including details such as participants, topics covered, and training duration. These records will be kept on-site for verification purposes.

Emergency Response Training:

• Personnel involved in hazardous waste handling will also receive practical training on emergency response measures to mitigate risks effectively.

5.7 Review and Update

This plan is a living document, meaning it will be reviewed and updated periodically to reflect changes in project requirements, related legislation, or industry standards. The following principles will guide this process:

Regular Updates:

• Updates will be made as necessary, especially after legislative changes or the identification of new waste management practices.

Roles and Responsibilities:

• Supervision consultants and contractors are responsible for staying informed about the plan's content and ensuring compliance with its measures and commitments.

5.8 Implementation Oversight

Contractors must provide relevant training to their staff and ensure the plan's measures are effectively implemented. This includes tracking compliance and addressing any identified deficiencies.

Table 8: Waste Log Form

Month:

Waste Log Form No:

No	Date	Type (Hazardous/ Non- hazardous)	Sub-type	Waste (ton/m ³)	Transporter	Disposer	Disposal Method
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							

Table 9: Waste Management Inspection Checklist

Inspection Date: Inspection Location:

Control Measure	Compliance (Yes/No)	Comment
Are all waste streams being properly separated and labeled into the following categories? - Hazardous Waste - Non-hazardous waste		
Is the site waste inventory current and up to date?		
Are hazardous and non-hazardous wastes stored at separate locations?		
Has a map been produced showing the correct waste storage locations which are visible to all workers		
Are all waste storage containers appropriately labeled to prevent cross- contamination of waste materials?		
 Are all waste labels complete and include the appropriate information? Waste stream (Hazardous, nonhazardous, etc.) Type of waste (solid, liquid, or sludge) Amount of waste Known environmental, health, and safety 		
Are licenses of companies contracted for waste transport and waste disposal valid and up-to-date?		

ANNEX 16 Emergency Response Plan Template

[Project Name & Location]

Date:

Prepared by:

1. Introduction

- **Purpose:** To establish procedures for effectively managing emergencies, minimizing risks to personnel, community, and the environment.
- **Scope:** Applicable to all activities under [Project Name] during construction and operation phases.

2. Legal Framework and Standards

- Relevant laws and regulations, including:
 - [Law No. 7269 Disaster Relief Law]
 - OHS Law No. 6331
 - > National and international environmental and social regulations¹⁸

3. Roles and Responsibilities

Define roles for emergency management, including:

- Emergency Coordinator: Ensures plan implementation and coordination with local authorities.
- Site Supervisors: Oversee emergency response execution and staff training.
- Contractors/Subcontractors: Ensure compliance with ERP and provide necessary resources.

4. Emergency Scenarios and Risk Assessment

Identify potential emergencies:

- Natural Disasters: Earthquakes, floods, storms.
- Environmental Incidents: Chemical spills, asbestos exposure¹⁹
- Fire and Explosion: Onsite or offsite hazards.
- Community Safety Risks: Traffic incidents, exposure to pollutants.²⁰

5. Preventive Measures

Detail measures to reduce emergency risks:

- Emergency drills and regular training sessions²¹
- Proper storage of hazardous materials
- Installation of fire extinguishers, spill kits, and safety signage onsite.²²

6. Emergency Response Procedures

Outline clear, step-by-step actions for each scenario:

Earthquake Response:

- Evacuate personnel to designated safe zones.
- Conduct headcount to ensure all are accounted for.

Fire or Explosion:

• Activate fire alarms and notify local fire services.

 $^{^{18}}$ ANNEX 1 National and international environmental and social regulations.

¹⁹ ANNEX 12 Asbestos Management Plan

²⁰ ANNEX 14 Community Safety and Traffic Management Plan

²¹ ANNEX 14 Community Safety and Traffic Management Plan

²² ANNEX 16 Emergency Response Plan

• Evacuate affected areas following the site's fire escape routes.

Spills or Leaks:

- Isolate the area and use spill containment kits.
- Notify local environmental authorities and the Istanbul Project Coordination Unit (IPCU).

7. Communication Plan

- Emergency contact list for:
 - Local authorities (e.g., fire department, police).
 - Project stakeholders (e.g., IPCU).
- Internal communication tree for reporting incidents.

8. Training and Awareness

- Regular training sessions for all staff on:
 - > Evacuation procedures and safe equipment handling.
 - Use of personal protective equipment (PPE).

9. Monitoring, Reporting, and Review

- Monitoring: Conduct regular audits and drills to test ERP effectiveness²³
- Incident Reporting: Maintain a log of all incidents with details of response actions taken.
- **Plan Review**: Update the ERP annually or after significant changes in project scope or regulations.

10. Appendices

- Site Maps: Include evacuation routes, assembly points, and hazard areas.
- Contact Information: Emergency numbers for relevant agencies and personnel.
- **Checklist Templates**: Forms for conducting drills, incident reporting, and post-incident evaluations²⁴

²³ANNEX 10 Environmental and Social Management Plan (ESMP) Template and ANNEX 11 Occupational Health and Safety Plan Outline

²⁴ ANNEX 12 Asbestos Management Plan