KOCAER STEEL INDUSTRY & TRADE INC.

Operation Capital Investment Project

Environmental and Social Management Plan

(Plan No: KCR-PLN-HSSE-001)

August 2022

PROJE MÜŞAVİRLİK MÜHENDİSLİK
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Project Information

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Abbreviations

AIIB	Asian Infrastructure and Investment Bank
AoI	Area of Influence
CBD	Convention on Biological Diversity
DCC	Document Control Center
EHS	Environmental, Health, and Safety
EIA	Environmental Impact Assessment
ERP	Emergency Response Plan
ESAP	Environmental and Social Action Plan
ESMP	Environment and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
GMP	Grievance Mechanism Procedure
EU	European Union
HS	Health and Safety
IFC	International Finance Corporation
ISO	International Standards Organization
Kocaer	Kocaer Steel Industry & Trade Inc.
KPI	Key Performance Indicator
Leq	Equivalent Continuous Sound Level
LAeq	A-weighted, Equivalent continuous Sound Level
LTLV	Long-Term Limit Value
MSDS	Material Safety Data Sheet
MGS	MGS Proje Müşavirlik Mühendislik Ticaret Ltd. Şti. / MGS Project Consultancy Engineering Trade Limited Co.
NGO	Non-Governmental Organization
OG	Official Gazette
OHS	Occupational Health and Safety
SoW	Scope of Work
SRS	Social Responsibility Staff
Project Company	Kocaer Steel Industry & Trade Inc. /Kocaer Celik Sanayi ve Ticaret AS
PS	Performance Standard
RAMEN	Regulation on Assessment and Management of Environmental

	Noise
RCIAP	Regulation on Control of Industrial Air Pollution
RAQAM	Regulation on Air Quality Assessment and Management
SEPA	Special Environmental Protection Area
STLV	Short Term Limit Value
TOC	Total Organic Carbon
TKYB	Türkiye Kalkınma ve Yatırım Bankası A.Ş./ Development and Investment Bank of Turkey
The Project	Kocaer Operation Capital Needs Financing Project
UN	United Nations
UNESCO	United Nations Educational, Scientific and Cultural Organization
WHO	World Health Organization

1 INTRODUCTION

This Environmental and Social Management Plan (ESMP) is prepared within the scope of Kocaer Operation Capital Investment Project to complete the studies conducted for assessment of environmental and social impacts of the Project according to the National Environmental Legislation, TKYB Environmental and Social Policy, IFC Performance Standards (PSs) and Asian Infrastructure and Investment Bank (AIIB) Environmental and Social Standards (ESSs). The reference number of this document is KCR-PLN-HSSE-ESMP-001.

1.1 Background

Kocaer started production activities in Denizli in 1984 with a production capacity of 18.000 tons/year in an area of 3.000 m2. The company, which was selling most of its production domestically in those years, established its first factory in Aliağa, İzmir in 1996, in order to increase its export potential and to be close to the ports and production facilities that will provide raw material supply since 1990. The company commissioned its factories where it produces medium section products in 2008 and light section products in 2017 with 800,000 tons/year production capacity due to increase its market share in exports in the following years.

Kocaer carries out its production activities in a total area of 280,000 m^2, 85,000 m^2 of which is closed. In addition to its 3 steel profile factories, the company has a Service Center with a capacity of 120,000 tons/year and a Galvanizing Factory with a capacity of 100,000 tons/year, which is the only facility integrated into steel profile production. There is a 13 million kWh electricity generation facility (GES) on the roof of the A1, A2, A3 Steel Factories. Thanks to its overseas distribution channel established in the United Kingdom, it exports to 140 countries in 6 continents with a sales revenue of 533 million US Dollars in the last 12-month period ending on 31.03.2022.

Operating in the energy transmission line, solar energy infrastructure, structural steel, transportation, mining, tunnel, shipbuilding, agriculture, machinery manufacturing and defense industry sectors, Kocaer produces steel profiles of high strength, special qualities, different sizes, special lengths and sections. Realizes its sales through export, foreign and domestic distribution channels.

An Operation Capital Investment Project will be prepared to be used in the existing production facility with 4 branches in Aliağa district, İzmir, operated by Kocaer A.Ş., and the deficiencies

of these facilities will be eliminated. Within the scope of the project, İt is planned to be used for the expenses of the business. There will be no construction work within the scope of the Project.

The activities to be carried out within A2 Facility of the project were evaluated in accordance with the provisions of the "Environmental Impact Assessment Regulation" dated 16.12.2003 and numbered 25318 and approved with the "EIA Positive" document dated 28.08.2014. In addition, A1, A3 and Service Center and Galvanization Facility have the “EIA is not Necessary” documents which are given by İzmir Provincial Directorate of Environment, Urbanization and Climate Change dated 16.09.2021, 27.09.2021, 30.04.2021, respectively.

1.2 Scope

The scope of this document comprises all the activities to be undertaken operation, and maintenance phases of the Project. This document must be accepted as a “living” document and must be developed and improved as per changing needs and circumstances of the Project. Therefore, Kocaer has endeavored to develop an approach that responds to the need for some flexibility regarding future roles and responsibilities for implementation of various compliance tasks during installation and operational phases of the Project.

The requirements and commitments set out in this plan are directly applicable to all Project employees including the personnel of Contractors.

This ESMP involves the following management sub-topics prepared as part of this management plan:

- Air Quality Management
- Noise Management
- Waste Management
- Contractor Management
- Occupational Health and Safety Management
- Community Health and Safety Management
- Biodiversity Management
- Cultural Heritage
- Cumulative Environmental Impacts
- Stakeholder Engagement and Grievance Mechanism.

Additionally, this ESMP overlaps and cross-linkages the other Management Plans and Procedure developed for the Project:

- Stakeholder Engagement Plan (SEP) (KCR-PLN-SOC-SEP-001),
- Internal and External Grievance Mechanism Procedure (KCR-PRC-SOC-GRM-001),
- Occupational Health and Safety Management Plan (KCR-PLN-HSE-OHSMP-001),
- Waste Management Plan (KCR-PLN-HSE-WMP-001),
- Wastewater Management Plan (KCR-PLN-HSE-WWMP-002).

This Environmental and Social Management Plan has been developed for the operational phase of the Project. It is based on the ISO 14001 Environmental Management System and is in line with IFC PSs, AIIB ESSs and guidelines. The “Plan-Do-Check-Act” principle of IFC that has also been adopted by Kocaer is given in Figure 1-1.

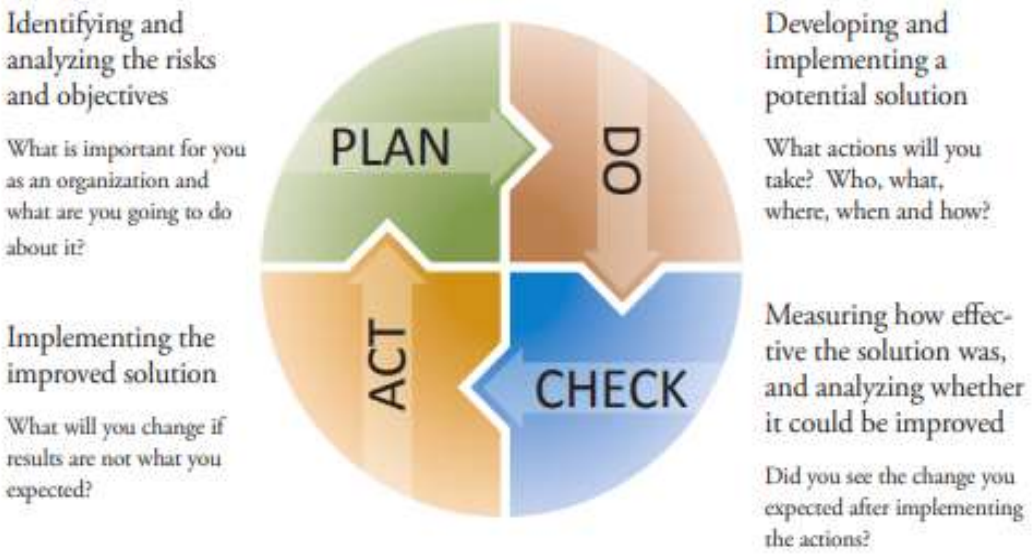

Figure 1-1. "Plan-Do-Check-Act" Principle Retrieved from: IFC ESMS Implementation Handbook

A solid, functioning Environmental and Social Management System (ESMS) is made up of interrelated elements. The following figure represents the nine elements of an effective ESMS each of which are vital to the ESMS because they help to assess, control, and continually improve environmental and social performance.

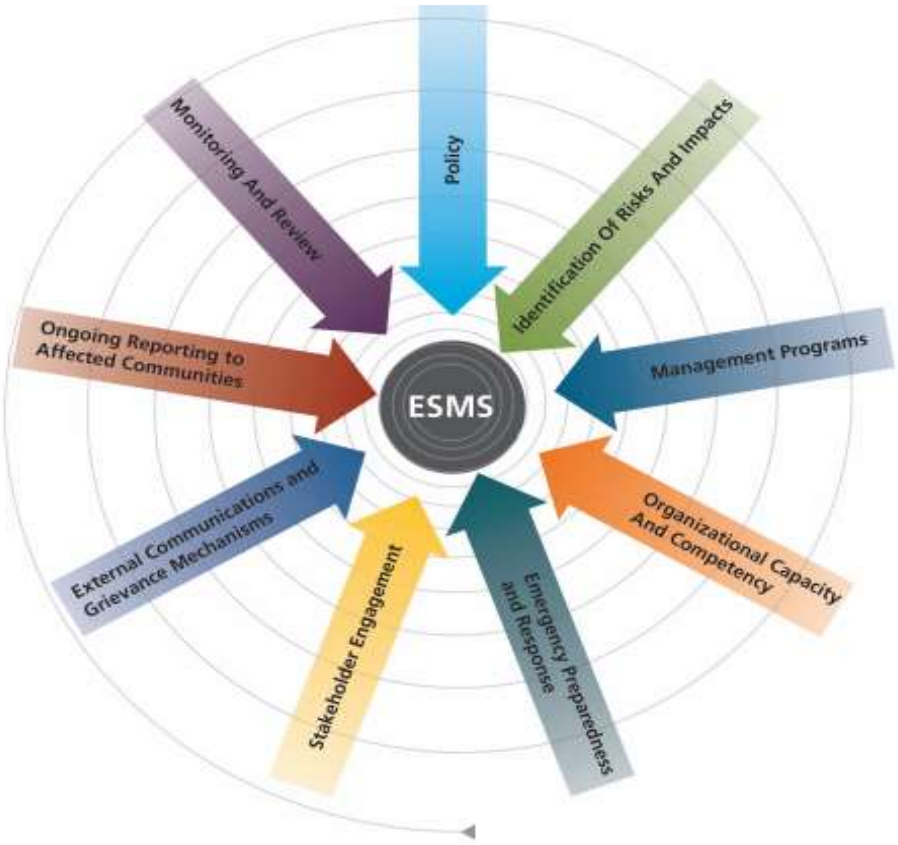

Figure 1-2. Elements of Environmental and Social Management System (ESMS)

1.3 Purpose

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

- outline the environmental and social goals of the Project,
- present an overview of the ESMS that will be implemented to ensure a systematic and effective execution of the environmental and social commitments relevant to the operational phase of the Project,
- provide a detailed explanation of relative roles and responsibilities,
- ensure the awareness and competence of personnel regarding objectives, and targets,
- conduct periodic internal and external audits, inspection, and monitoring; and
- review the progress in achieving the environmental and social objectives and targets; and make improvements.

1.4 Definitions

Area of Influence: Area potentially affected by impacts from project activities, and facilities.
Audit: System of gathering information to determine the degree of compliance with applicable policies, standards, or regulations.
Contractor(s): Refers to the contractors of the Project.
Environmental and Social Objective: Overall environmental and/or social goal, arising from the environmental and social policy, that an organization sets itself to achieve, and which is quantifiable where practicable.
Environmental and Social Target: Detailed performance requirement, quantified where practicable, applicable to the organization or parts thereof, that arises from the environmental or social objectives and that needs to be set and met to achieve those objectives.
ISO 14001: International Standards Organization – Environmental Management Systems: Requirements with guidance for use.
Key Performance Indicator (KPI): An indicator that is measured against a target, with the expectation that the target will be met, indicates compliance with the project requirements.
Measure: An indicator of the volume or quantity of an impact.
Monitoring: Observation and sampling to obtain information to establish baseline and trends.
Shall and Must: Indicates mandatory requirements.
Should: Indicates that a provision is not mandatory but recommended as good practice.
Sub-contractor: Company working under a contract to a contractor.
Work: All activities, services and materials provided by the contractor, subcontractors, and suppliers.

2 ROLES AND RESPONSIBILITIES

Tables presented in this section involves key roles and responsibilities separately for each management subject under the relevant subsections.

2.1 Air Quality Management

Table 2-1. Roles and Responsibilities of Air Quality Management

Roles	Responsibilities
General Manager	▰ Ensuring that this plan is implemented properly, ▰ Providing necessary resources for the implementation of the plan, ▰ Determining general policies and targets.
Management Systems Manager	▰ Coordinating with parties for the implementation of the plan.
Health, Safety and Environment & Management Systems Chief	▰ Ensuring the Project compliance with the Project Standards and other requirements set out in this plan, ▰ Overall responsibility with Environmental Engineer for Plan scope and implementation, ▰ Responsible of development, monitoring and revision of this Plan, ▰ Responsible for training (including general awareness material e.g., toolbox talks) of site personnel ▰ Evaluates the reports of periodic audits and inspections of the operational areas done by environmental officer /consultant to monitor performance against the requirements of this Plan during installation phase,
Environmental Engineer	▰ Determining the environmental impacts and hazards in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances, ▰ Ensuring Project compliance with the Project Standards and other requirements set out in this Plan, ▰ Reports all hazards, non-conformances and incidents related to OHS and community health and safety, ▰ Having overall responsibility Health, Safety and Environment & Management Systems Chief a for scope and implementation of this Plan, ▰ Reporting all hazards, non-conformances, and incidents related to ambient air quality, ▰ Providing a system for monitoring the types and quantities of pollutions on the site, ▰ Ensuring that all personnel are fully trained in air quality management practices,

Roles	Responsibilities
	➢ Ensuring that air quality monitoring is undertaken as set out in applicable Management Plans and Procedures, ➢ Working with SRS to address any off-site air quality issues, ➢ Undertaking periodic audits and inspections of the operational areas to monitor performance against the requirements of this Plan.
Social Responsibility Staff (SRS)	➢ Reporting relevant complaints to Health, Safety and Environment & Management Systems Chief, Responsible for the management of grievance procedure, ➢ Maintaining engagement and liaison with the local communities, organizing stakeholder meetings to collect the responses to grievances actively as required.
Site Engineers	➢ Providing oversight and conducting routine inspections on site regarding air quality, ➢ Ensuring relevant activities accordance with the Management Plan and related Procedures.
Contractors / Subcontractors	➢ Ensuring that relevant activities are undertaken in accordance with this Management Plan and related procedures, ➢ Ensuring that all personnel are fully trained in air quality management, ➢ Reporting any incident to Management Systems Manager. ➢ Avoid performing activities which unnecessarily generate dust or emissions.

2.2 Noise Management

This section outlines key roles and responsibilities related to the noise management issues.

Table 2-2. Key Roles and Responsibilities of Noise Management

Roles	Responsibilities
General Manager	➢ Ensuring that this plan is implemented properly, ➢ Providing necessary resources for the implementation of the plan.
Management Systems Manager	➢ Coordinating with parties for implementation of the plan.

Roles	Responsibilities
Health, Safety and Environment & Management Systems Chief	➢ Ensuring Project compliance with the Project Standards and other requirements set out in this Plan, ➢ Responsible for training (including general awareness material e.g. toolbox talks) of site personnel, ➢ Ensuring that all incidents, near misses, complaints are reported and dealt with effectively, ➢ Implementing the requirements of noise management.
Environmental Engineer	➢ Ensuring Project compliance with the Project Standards and other requirements set out in this Plan, ➢ Reporting all hazards, non-conformances, and incidents to Health, Safety and Environment & Management Systems Chief ➢ Coordinating noise management during installation and operation phase, ➢ Providing a system for monitoring the types and quantities of pollutions on the site, ➢ Undertaking periodic audits and inspections of the operational areas to monitor performance against the requirements of this Plan during installation and operation phase, ➢ Working with SRS to address any off-site noise issues and/or grievance procedure, ➢ Implementing the requirements of noise management.
Social Responsibility Staff (SRS)	➢ Reporting all hazards, non-conformances and complaints related with the Project and contractor to Health, Safety and Environment & Management Systems Chief Responsible for management of grievance procedure, ➢ Maintaining engagement and liaison with the local communities during installation and operation phases.
Contractors / Subcontractors	➢ Ensuring that relevant activities are undertaken in accordance with this Management Plan and related procedures, ➢ Ensuring that all personnel are fully trained in noise management, ➢ Reporting any incident to Health, Safety and Environment & Management Systems Chief, ➢ Avoid performing activities which unnecessarily generate noise.

2.3 Waste Management

This section outlines key roles and responsibilities related to the waste management issues.

Table 2-3. Waste Management Roles and Responsibilities

Roles	Responsibilities
General Manager	➢ Ensuring this plan will be applied during the lifetime of the Project,
Management Systems Manager	➢ Providing the necessary resources for the approval and implementation of this Procedure, ➢ Being responsible for the implementation of the Waste Management Plan by fulfilling the project requirements.
Health, Safety and Environment & Management Systems Chief	➢ Ensuring the project's compliance with the Project Standards and other conditions specified in this Plan, ➢ Training field staff on waste management and the requirements of this Plan with Environmental Engineer ➢ Training site personnel on the health, safety, and environmental impacts of waste management (job interviews, etc.). ➢ Ensuring that all personnel, including the management staff, are aware of waste management and requirements, ➢ Having the responsibility to control the problems arising from waste in the field, ➢ Ensuring that all disposal facilities are licensed in line with the project requirements, ➢
Social Responsibility Staff (SRS) (Personnel Chief)	➢ Maintaining interaction and communication with local communities during the operation phase, ➢ Ensuring that all complaints about waste / pollution by stakeholders are recorded and reported in accordance with the GMP.
Environmental Engineer	➢ Implementing regular surveillance to ensure that relevant project activities comply with the Waste Management ➢ Periodically checking the national legislations and international standards and guidelines specified in the Plan and making appropriate revisions in this Plan when applicable new legislation and standards come into force, ➢ Training field staff on waste management and the requirements of this Plan,

Roles	Responsibilities
	➢ Training site personnel on the health, safety, and environmental impacts of waste management (job interviews, etc.). ➢ Making periodic inspections and inspections of the site during operation phase, ➢ Reporting all dangerous situations, non-conformities, and incidents.
Contractors / Subcontractors	➢ Ensuring that relevant project activities are carried out in accordance with this Management Plan and related procedures, ➢ Making sure that all personnel are fully trained on waste management, ➢ Reporting each incident / accident within the scope of waste management to the Health, Safety and Environment & Management Systems Chief.

2.4 Contractor Management

Key roles and responsibilities related to the contractor management is given as follows.

Table 2-4. Key Roles and Responsibilities of Contractor Management

Roles	Responsibilities
General Manager	➢ Ensuring that this plan is implemented properly, ➢ Awarding of contracts.
Management Systems Manager	➢ Ensuring the Project compliance with the Project Standards and other requirements set out in this Management Plan, ➢ Implementing contractor management processes by Departments Responsible Staff of the Project, ➢ Supporting the Scope of Work (SoW) for each Contractor in consultation with the Health, Safety and Environment & Management Systems Chief, Environmental Engineer and Social Responsibility Staff as appropriate, ➢ Supporting Procurement on the selection of suppliers, ➢ Supervising the contract works to ensure compliance with the contract and the Project requirements, and schedules, ➢ Developing any additional controls required if the Contractor does not have sufficient skills and experience to address the issues identified in the Scope of Work, ➢ Reporting to the General Manager about system performance.

Roles	Responsibilities
Technical Purchasing Manager	▰ Ensuring Project compliance with the Project Standards and other requirements set out in this management plan, ▰ Developing the Scope of Work (SoW) for each for each Contractor in consultation with the other departments managers as appropriate, ▰ Developing any additional controls required if the Contractor does not have sufficient skills and experience to address the issues identified in the SoW, ▰ Initiating and managing the procurement processes, ▰ Undertaking Bid evaluation, if required, ▰ Providing the administrative support for the contract execution and payments, ▰ Completing the Contractor Performance Score card on a periodic basis, ▰ Participating in Bid evaluation (including verification that HS and Environmental hazard identification responses from bidders are completed), ▰ Keeping the Project Department Responsible Staff informed of the progress of mobilization and engagement, ▰ Providing any Contractor MSDS to Management Systems Manager to ensure that chemicals are registered and permitted for use by the Turkish authorities, ▰ Organizing the Project Induction and Site Induction for the Contractors.
Quality Control Manager	▰ Supervising the Contractors to meet the Project Standards and requirements, ▰ Assisting Procurement with the selection of suppliers and supporting in the development of the Scope of Work for contracts, ▰ Managing contractors OHS compliance with the Project requirements as detailed in the Project management plans, ▰ Helping the development of the SoW as required, ▰ Participating in Bid evaluation, including verification that HS and Environmental hazard identification responses from bidders are completed, ▰ Completing the Contractor Performance Scorecard periodically, ▰ Confirming that any Contractor chemicals are registered and permitted for use by the Turkish authorities,

Roles	Responsibilities
	➢ Keeping records of MSDS, ➢ Controlling and keeping records of medical examinations done for all workers of the Project.
Environmental Engineer & OHS Expert	➢ Ensuring Project compliance with the Project Standards and other requirements set out in this Plan, ➢ Supervising the Contractor to meet the Project Standards and requirements, ➢ Assisting Procurement with the selection of suppliers and supporting in the development of the Scope of Work for contracts, ➢ Reporting contractors' environmental compliance with the Project requirements as detailed in the Project management plans to Health, Safety and Environment & Management Systems Chief, ➢ Helping the development of the SoW as required, ➢ Participating in Bid evaluation, including verification that environmental and communities hazard identification responses from bidders are completed.
Social Responsibility Staff (SRS)	➢ Helping Health, Safety and Environment & Management Systems Chief for the development of the Scope of Work, as required, ➢ Recording, resolving, and closing grievances about contractors and procurement related issues.
Contractors / Subcontractors	➢ Complying with the requirements and standards of this plan, ➢ Fulfilling of works under the contract, ➢ Completing the Project awareness and competency training before commencement of work, ➢ Completing medical assessment before commencement of work if required, ➢ Providing necessary vehicles and equipment in good working order and compliance with the Contract requirements, ➢ Providing a listing of any chemicals and MSDS prior to bringing any such materials onto the Project work site.

2.5 Community Health and Safety Management

Table 2-5. Key Roles and Responsibilities of Community Health and Safety Management

Roles	Responsibilities
General Manager	▰ Ensuring that this plan is implemented during the lifetime of the Project, ▰ Determining general policies and targets.
Management Systems Manager	▰ Ensuring this plan will be implemented during the lifetime of the Project, ▰ Providing necessary resources for proper implementation, ▰ Coordinating with parties for proper implementation of this Management Plan.
Health, Safety and Environment & Management Systems Chief	▰ Determining the OHS hazards with Management Systems Manager and OHS Experts in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances, ▰ Ensuring that all provisions in the Contractor engagements regarding HS requirements as per the project standards during the installation stage and to audit the performance of the Contractors, ▰ Determining and providing the necessary training materials for employees, ▰ Providing answers to the OHS-related grievances with OHS Expert and SRS, ▰ Identifying the needs for OHS trainings with Environmental Engineer and OHS Expert, ▰ Providing control of Risk management with Health, Safety and Environment & Management Systems Chief, ▰ Ensuring drills conducting and provide feedback training programs for corrections of defectiveness within drills, ▰ Monitoring the permits and notices regarding OHS ensures that the necessary permits are obtained, ▰ Ensuring proper implementation of the Plan.

Roles	Responsibilities
Environmental Engineer & OHS Expert	▰ Determining the national and international legislations that are applicable to the Project activities and informing the Health, Safety and Environment & Management Systems Chief ▰ Determining the environmental impacts in accordance with the actions, potential mitigation measures and measures to eliminate any potential social grievances, ▰ Ensuring that all provisions in the Contractor engagements regarding environmental requirements as per the project standards during the operations, ▰ Conducting internal audits / site audits and determining corrective measures, if necessary, ▰ Providing answers to the environmental and HS related grievances raised by employees, the local community, and local institutions, ▰ Identifying the needs for environmental and HS trainings, ▰ Checking the Environmental and HS records and performance reviews of Contractors, ▰ Monitoring the permits and notices regarding Environment and HS and ensuring that the necessary permits are obtained, ▰ Ensuring proper implementation of the Plan.
Social Responsibility Staff (SRS)	▰ Keeping the records of the complaints / suggestions in the Grievance Database with details (raised by who, date, status etc.), ▰ Coordinates with Environmental Engineer and OHS Expert on the first evaluation of the relevance of grievances collected, ▰ Responsible for management of grievance procedure, ▰ Giving the feedback to the stakeholders about the results of their grievances through External Grievance Form within 30 calendar days ▰ Providing answers to the social grievances raised by employees, the local community, and local institutions, ▰ Providing regular reporting back to the community on the management related to community grievances, ▰ Recording all formal and informal engagement activities with local communities in Stakeholder Management System, ▰ Keeping records of the types of leaflets, brochures, newsletters prepared and distributed, by location and this detail will be inserted to stakeholder engagement quarterly reports,

Roles	Responsibilities
	➢ Monitoring and recording the social responsibility activities carried out in the scope of Project and these records will be inserted to stakeholder engagement quarterly reports, ➢ Forming relationships with the Project stakeholders, ➢ Organizing stakeholder meetings to collect the responses to grievances actively as required.
Administrative Affairs Responsible	➢ Identifying personnel, organization, physical security system, vehicle equipment, material, arms, hardware and logistic requirements of security system and their provision from project management, ➢ Preparing security budget and control the expenses, ➢ Identifying security personnel's duties and requirements, develop measures for personnel trainings with training programs. ➢ Controlling whether the trainings are conducted efficiently, ➢ Conducting inspection and general administration of security operations, ➢ Composing security personnel's job definition by conducting of analysis. ➢ Identifying criteria for personnel selection and to provide recruitment and organizing of personnel within these criteria, ➢ Identifying performance of security personnel with planned and unplanned inspections. ➢ Identifying competence of physical security measures with his inspections and controls, to provide timely and on-site recovery of malfunctions within this process, ➢ Controlling whether security personnel affairs are performed appropriately, ➢ Presenting expected results and actual results from activity to project management.
Contractors / Subcontractors	➢ Complying with the requirements and standards of this plan, ➢ Responsible not to make any commitment in their interaction with the stakeholders beyond their competence, ➢ Following the rules listed in this Management Plan and other relevant management system documentation of the Project.

2.6 Biodiversity Management

Table 2-6. Key Roles and Responsibilities related to Biodiversity Management

Roles	Responsibilities
General Manager	➢ Ensures that this management plan is implemented throughout the Project activities.
Management Systems Manager	➢ Approval of the necessary resources for this Plan and its implementation, ➢ Inform the General Manager about the performance and needs of this Plan.
Health, Safety and Environment & Management Systems Chief	➢ Provides necessary resources for proper implementation, ➢ Determines the national and international legislations that are applicable to the Project activities, ➢ Ensures that all provisions in the Contractor engagements regarding environment as per the project standards and to audit the performance of the Contractors ➢ Determines and provides the necessary training materials for employees, ➢ Identifies the need for Environmental and HS trainings in accordance with biodiversity issues, ➢ Checks the Environmental and HS records and performance reviews of Contractors ➢ Supports the Environmental Engineer in the implementation of this Plan. ➢ Conducts internal audits / site audits and determines corrective measures, if necessary.
Social Responsibility Staff (SRS)	➢ Keeps the records of the complaints / suggestions in the Grievance Database with details (raised by who, date, status etc.) ➢ Supports Environmental Engineer on the first evaluation of the relevance of grievances collected, ➢ Shows best efforts to resolve all complaints in one month, ➢ Provides regular reporting back to the community on the management related to community grievances, ➢ Records all formal and informal engagement activities with local communities.
Site Engineers	➢ Report all hazards, non-conformances, and complaint.
Contractors / Subcontractors	➢ Contractors / Sub-contractors are responsible not to make any commitment in their interaction with the stakeholders beyond their competence, ➢ Follows the rules listed in this Plan and other relevant management system documentation.

Roles	Responsibilities
Biodiversity Advisor (Experts on Ecology – Flora and Fauna) (if required)	➢ Supports the Health, Safety and Environment & Management Systems Chief in the strategic decisions related to the Biodiversity Management where needed, ➢ Works in coordination with Health, Safety and Environment & Management Systems Chief and Environmental Engineer ➢ Conducts independent monitoring to ensure compliance and reporting the results when required.

2.7 Cultural Heritage Management

Table 2-7. Key Roles and Responsibilities of Cultural Heritage Management

Roles	Responsibilities
General Manager	➢ Ensures this management plan and procedure will be implemented during the Project. ➢ Resources required elements for the implementation of this Plan.
Management Systems Manager	➢ Ensures implementation of this Plan by fulfilling the requirements, ➢ Informs the General Manager about the findings.
Health, Safety and Environment & Management Systems Chief	➢ Ensures the Project compliance with the Project Standards and other requirements set out in this Management Plan, ➢ Trains of the employees about cultural heritage and chance find procedure, ➢ Develops, and revises this Plan ➢ Conducts cultural heritage assessment processes, ➢ Ensures activities do not disturb cultural heritage sites without appropriate approvals, ➢ Investigates, reports, and follows up of unauthorized site disturbances or procedural breaches, ➢ Ensures that site personnel involved in projects that may disturb cultural heritage receive appropriate training and inductions so that they understand their cultural heritage responsibilities, ➢ Documents this management plan-based issues, ➢ Informs the Management Systems Manager about the performance of the system.

Roles	Responsibilities
Social Responsibility Staff (SRS)	▰ Coordinates organizations and other stakeholders for implementing this Plan, ▰ Supports Health, Safety and Environment & Management Systems Chief for the development of the Scope of Work, as required.
Site Engineers	▰ Provide oversight and conduct routine works to ensure relevant activities are in accordance with the Management Plan and related Procedures
Contractors / Subcontractors	▰ Comply with the requirements and standards of this Cultural Heritage Management and Chance Find Procedure, ▰ Fulfill the works under the contract, ▰ Complete the Project awareness and competency training before commencement of work, ▰ Comply with the Project Cultural Heritage Management requirements set out in contractor contracts.
Employees	▰ Being trained about the Cultural Heritage Management Plan and Chance Find Procedure through induction training and other training provided.

3 PROJECT STANDARDS

National regulations, standards and international standards and guidelines applicable to this plan are set out in this section. All the regulations, standards, and guidelines regarding the topics of this plan are presented separately.

3.1 Applicable Turkish Standards

3.1.1 Air Quality Management

National regulations related to air quality management are as follows:

- Regulation on Air Quality Assessment and Management (RAQAM) (OG no: 26898, date: 06.06.2008)
- Regulation on Control of Industrial Air Pollution (RCIAP) (OG no: 27277, date: 03.07.2009)
- Regulation on Control of Exhaust Gas Emission (OG no: 30004, date: 11.03.2017)

While Appendices I and I-A of RAQAM provide limit values for the specific pollutants such as SO_2, NO_2, PM_{10}, CO, and O_3, Appendices of RCIAP provides limit values for the pollutant TOC (Total Organic Compounds as Carbon). Ambient air quality limit values for above-mentioned pollutants listed in Table 3-1 below.

Table 3-1. Turkish Ambient Air Quality Limit Values

Parameter	Duration	Unit	Limit Value	
			2019-2023	2024 and after
SO_2	Hourly (not to be exceeded more than 24 times in a year)	µg/m³	350	350
	24-hour		125	125
	LTLV		60	60
	**Annual and winter semester (1 October-31 March)		20	20
NO_2	Hourly (not to be exceeded more than 18 times in a year)	µg/m³	250	200
	yearly		40	40
Airborne Particulate Matter (PM 10)	24-hour (not to be exceeded more than 35 times in a year)	µg/m³	50	50
	Yearly		40	40
Pb	Yearly	µg/m³	0.5	0.5
CO	maximum daily 8-hour average	mg/m³	10	10
Cd	LTLV	µg/m³	0,02	0,02
HCl	STLV	µg/m³	150	150
	LTLV		60	60

Parameter		Duration	Unit	Limit Value	
				2019-2023	2024 and after
HF		Hourly	µg/m³	30	30
		STLV		5	5
H_2S		Hourly	µg/m³	100	100
		STLV		20	20
Total Organic Compounds (in carbon)		Hourly	µg/m³	280	280
		STLV		70	70
Precipitated Dust		STLV	mg/m² days	390	390
		LTLV		210	210
In the Precipitated Dust	Pb and its compounds	LTLV	mg/m ² days	250	250
	Cd and its compounds	LTLV		3,75	3,75
	Tl and its compounds	LTLV		5	5

LTLV=Long-Term Limit Value

STLV=Short-Term Limit Value

3.1.2 Noise Management

In Turkey, environmental noise is regulated by the Regulation on Assessment and Management of Environmental Noise (RAMEN) which is put into force on 04.06.2010 with the Official Gazette numbered as 27601. The regulation sets noise limits applicable to various areas (e.g., industrial areas, residential areas, or combination of both) for three time periods (day, evening and night-time).

Related to the operation phase of the Project, limit value for noise emission sources of industrial facilities to the surrounding buildings in the Turkish Regulation on the Assessment and Management of Environmental Noise is presented in Table 3-2 which gives maximum allowable environmental noise levels that shall be met at the nearest off-site receptor.

Table 3-2. Environmental Noise Limits for Industrial Facilities (Leq dBA)

Areas	Day (07:00 - 19:00)	Evening (19:00 - 23:00)	Night (23:00 - 07:00)
Areas where sensitive receptors are located including education, culture, health, summer houses and camps	60	55	50

Commercial and residential areas where residential buildings dominate	65	60	55
Commercial and residential areas where workplaces dominate	68	63	58
Industrial areas	**70**	**65**	**60**

The Project area falls within the “Industrial areas” for its operation phase.

3.1.3 Waste Management

Environment Law No.2872 (Official Gazette No: 18132, Date: 11.08.1983) provides a legal implementation framework for the regulation of industrial activities and their potential effects on the environment. Industrial projects are subject to several regulations on waste management as follows:

- Waste Management Regulation,
- Zero Waste Regulation
- Packaging Waste Control Regulation,
- Solid Waste Control Regulation
- Regulation on Control of Waste Electrical and Electronic Equipment,
- Regulation on Control of Waste Batteries and Accumulators,
- Regulation on Control of End of Life Tires,
- Regulation on Control of Waste Oils,
- Regulation on Control of Waste Vegetable Oils,
- Medical Waste Control Regulation,
- Hazardous Waste Control Regulation,
- Communiqué on the Transportation of Wastes on Road,
- Regulation on Control of Soil Pollution and Point Source Contaminated Sites,
- Communiqué on Recovery of Some Non-Hazardous Wastes.

3.1.4 Contractor Management

All contractors and subcontractors will comply with national legislation and standards in the scope of the Project. The below legislations and other related regulations and requirements which are defined in Environmental and Social Management Plan of the Project will be followed:

- Labour Law No. 4857
- Occupational Health and Safety Law No. 6331

- Regulation on Risk Assessment of Health and Safety
- Regulation on the Health and Safety Conditions on the Use of Work Equipment
- Regulation on Emergencies in Workplaces

3.1.5 Community Health and Safety Management

All activities in the management and monitoring of community health and safety will comply with the following national requirements.

Relevant Turkish legislation and regulations are:

- Regulation on Principles of Communicable Disease Surveillance and Control,
- Private Security Services Law No: 5188
- Regulation on Implementation of the Law on Private Security Services
- Communiqué on Major Accident Prevention Policy Documents
- Regulation on Prevention and Effect Control of Major Industrial Accidents

National Requirements:

- Regulation on Health and Safety Measures in Working with Chemicals,
- Regulation on Personal Protective Equipment,
- Regulation on Health and Safety Signs,
- Regulation on the Protection of Workers from Noise Related Risks,
- Regulation on Protection of Workers from the Risks of Explosive Atmospheres,
- Regulation on the Protection of Workers from Vibration Related Risks,
- Regulation on Plans and Principles of Occupational Health and Safety training of Workers,
- Regulation on Health and Safety Restrictions of Equipment Usage in Workplaces,
- Regulation on Duty, Authority and Responsibility and Training of Occupational Safety Specialists,
- Regulation on Emergency Situations in Workplaces,
- Regulation on Risk Assessment Regarding Occupational Health and Safety.

3.1.6 Biodiversity Management

The main element of the Turkish legislation regarding the Biodiversity is the Environmental Law (Law No: 2872). Even though this law is very broad in scope, complementary specific legislation for different environmental features such as energy, forestry, conservation, soil, and

land use, etc. are available. Laws and regulations regarding the conservation of the biological diversity are listed below in Table 3-3.

Table 3-3. National Laws and Regulations regarding Biodiversity

Regulation / Law	Official Gazette Date/ No.
Environmental Law	09.08.1983 / 2872
National Parks Law	09.08.1983 / 2873
Cultural and Natural Assets Protection Law	23.07.1983 / 2863
Statutory Decree on Establishment of a Special Environmental Protection Agency	19.10.1989 / 383
Terrestrial-Hunting Law	01.07.2003 / 4315
Law on Aquaculture	04.04.1971 / 1380
Forestry Law	31.08.1956 / 6831
Animal Protection Law	24.06.2004 / 5199
Regulation on the Protection of Wetlands	17.05.2005 / 25818
Regulation on Implementation of Convention on International Trade in Endangered Species of Wild Fauna and Flora (Regulation on Implementation of CITES)	27.12.2001 / 24623
Regulation on Removal, Production and Export of Natural Flower Bulbs	19.07.2012 / 28358
Regulation on Aquaculture	10.03.1995 / 22223
Regulation on Protection of Wildlife and Wildlife Development Area	08.11.2004 / 25637
National Central Hunting Commission Conservation Lists (CHC) Decisions for 2019-2020	21.06.2019 / 30808 (repeated)

In addition to those national laws and regulations, following national environmental Strategies are also applicable:

- National Environmental Action Plan (1999)
- National Plan on In-situ Conservation of Plant Genetic Diversity (1998)
- National Agenda 21 Program (2001)
- National Wetland Strategy (2003)
- National Forestry Program of Turkey (2004)
- National Science and Technology Policies 2003-2023 Strategy Certificate (2004)
- National Action Program of Turkey to Combat Desertification (2005)

- National Environment Strategy (2006)
- National Rural Development Strategy (2006)
- National Biological Diversity Strategy and Action Plan (2007)
- National Biological Diversity Strategy and Action Plan for 2018-2028 (2019)

3.1.7 Cultural Heritage Management

3.1.7.1 Law on Protection of Cultural and Natural Assets

The management plan for archaeological heritage mitigation strategies along the project site corridor is to be designed to meet the requirements stipulated in the Law on Protection of Cultural and Natural Assets, Law No. 2863, (July 21, 1983). The objective of the Law is to set the definitions regarding the movable and fixed cultural and natural assets that shall be protected; to define the procedures and activities to be performed and to establish the formation and responsibilities of the organization that will enforce the required principles and implementation of action decisions on this subject (Official Gazette, 23/7/1983 number 18113). In the law archaeological sites are classified under three categories. These are:

- 1st Degree Archaeological Sites,
- 2nd Degree Archaeological Sites,
- 3rd Degree Archaeological Sites

1st Degree Archaeological Sites: Areas requiring the highest level of protection. They should be preserved except for scientific excavations. The area should be free of any type of buildings and construction. All kinds of construction, excavation, and modification activities are prohibited. However, for exceptional cases such as the necessity for infrastructure construction, Regional Preservation Boards may permit such activities based on the approval of the relevant museum and the head of the scientific excavation team.

2nd Degree Archaeological Sites: Areas requiring a ***high level*** of protection. They should be preserved based on the conditions of protection and utilization set by the Regional Preservation Boards. Additional construction is prohibited. As for the 1st Degree Site Degree archaeological sites, for exceptional cases such as the necessity for infrastructure construction, Regional Preservation Boards may permit such activities based on the approval of the relevant museum and the head of the scientific excavation team.

3rd Degree Archaeological Sites: Lowest level of the protection area. Construction is permitted based on the decisions of Regional Preservation Boards. Before applying for a

construction permit, test pit excavations should be conducted and the outcomes of these excavations should be reviewed by the relevant museum and, if present, the head of the scientific excavation team. ***All excavations are under the supervision of museum experts.*** Reviews should be submitted to Regional Preservation Boards. The Boards may ask for an extension of the areal test pit coverage before taking any decision.

Definitions (Article 3 of the Law numbered 2863)

Article 3 of the Protection of Cultural and Natural Entities Law provides the following definitions:

- *Cultural Assets are all over-ground, underground, or submarine movable and fixed assets related to science, culture, religion, and fine arts, belonging to prehistoric and historic eras.*
- *Natural Assets are the over-ground, underground, or submarine assets that belong to geological eras, prehistoric and historic eras and that shall be protected because of their rarity or specifications and preciousness.*

Obligation to Inform (Article 4 of the Law numbered 2863)

In case of a chance find of movable or immovable cultural assets, the nearest museum directorate, or mukhtar in the villages, local authorities in other places should be informed. If these cultural assets are encountered within military posts and forbidden areas, major commands should be duly informed. Mukhtar should inform the nearest local authority within a day (24 hours), the local authority and other authorities should report the incident to the Ministry of Culture and Tourism and the related museum directorate via a formal letter.

The Ministry of Culture and Tourism, General Directorate of Cultural Heritage and Museums and related ***Regional Board Directorate of Protection of Cultural Heritage*** are responsible for the registration of the cultural heritage.

Legal Necessities before the Impact Mitigation Measures (Article 7 of the Law numbered 2863)

In Article 7, it is stated that the related ***Regional Board Directorate of Protection of Cultural Heritage*** is responsible for the registration of cultural and natural heritage. Therefore, for the registration of the immovable cultural assets, it is required to apply officially and directly to the related ***Regional Board Directorate of Protection of Cultural Heritage.***

3.1.7.2 Regulation on Determination and Registration of Immovable Cultural and Natural Heritage

This regulation aims to introduce principles on permits about research and excavations to be conducted under the law of protection of cultural and natural entities, the preservation necessities of the findings, studies on these findings, the assignments, duties and authorizations, rights, and expenses of the related persons.

3.2 Turkish EIA Requirements

Environmental Law

The main law of National Environmental Legislation is the Environmental Law numbered 2872 which was issued on 11.08.1983 with the official gazette number of 18132. In this law, the Turkish Regulation on Environmental Impact Assessment (EIA) (Official Gazette, 17 July 2008, no 26939) is defined which includes a limited public disclosure process.

The plants and their operations subject to the planned project are not included in the Annex-I or Annex-II Lists of EIA Regulation, the plants operation is exempted from EIA Regulation. Official Letter of EIA Exemption for all three factories, A1, A2 and A3 are dated 18.06.2018 and numbered 48657465-220.02-E.18028, 4857465-220.02-E.18033 and 48657465-22.02-E.18031, respectively, was obtained by Izmir Provincial Directorate of Environment and Urbanization.

3.3 Applicable International Standards and Guidelines

Applicable international standards, legislations and guidelines are given as:

- IFC Performance Standards
- IFC General EHS Guidelines: Environmental Air Emissions and Ambient Air Quality
- AIIB Environmental and Social Framework and Standards
- Directive 2008/50/EC on Ambient Air Quality and Cleaner Air for Europe
- WHO Ambient Air Quality Guidelines (Global Update 2005).
- The UN Convention on Biological Diversity (CBD) (1997) and Cartagena Protocol on Biosafety (2004),
- The European Landscape Convention (2001).
- The Convention on the Conservation of European Wildlife and Natural Habitats (BERN) (1984),

- The Convention concerning the Protection of the World Cultural and Natural Heritage (1983).
- The Bird Directive (2009/147/EC)
- The Habitat Directive (92/43/EEC)
- European Convention on The Protection of the Archaeological Heritage
- Convention Concerning the Protection of the World Cultural and Natural Heritage
- IFC General Environmental, Health, and Safety (EHS) Guidelines

3.3.1 International Finance Corporation Performance Standards

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

- PS 1: Assessment and Management of Environmental and Social Risks and Impacts
- PS 2: Labor and Working Conditions
- PS 3: Resource Efficiency and Pollution Prevention
- PS 4: Community Health, Safety and Security
- PS 5: Land Acquisition and Involuntary Resettlement
- PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- PS 7: Indigenous Peoples
- PS 8: Cultural Heritage

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

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

- To identify and evaluate environmental and social risks and impacts of the Project.
- To adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimize, and, where residual impacts remain, compensate/offset for risks and impacts to workers, Affected Communities, and the environment.
- To promote improved environmental and social performance of clients through the effective use of management systems

- To ensure that grievances from Affected Communities and external communications from other stakeholders are responded to and managed appropriately.
- To promote and provide means for adequate engagement with Affected Communities throughout the project cycle on issues that could potentially affect them and to ensure that relevant environmental and social information is disclosed and disseminated.

PS 2: Labor and Working Conditions

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

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

PS 3: Resource Efficiency and Pollution Prevention

PS 3 recognizes that increased economic activity and urbanization often generate increased levels of pollution to air, water, and land, and consume finite resources in a manner that may threaten people and the environment at the local, regional, and global levels. The objectives of PS 3 are:

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

PS 4: Community Health, Safety and Security

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

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

PS 5: Land Acquisition and Involuntary Resettlement

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

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

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

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

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

PS 7: Indigenous Peoples

PS 7 recognizes that indigenous people as social groups with identities that are distinct from mainstream groups in national societies, are often among the most marginalized and

vulnerable segments of the population and sets objectives to anticipate and avoid adverse impacts of projects on them through ensuring appropriate management and consultation principles.

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

PS 8: Cultural Heritage

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

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

Environmental Health and Safety Guidelines

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

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

3.3.2 AIIB Environmental and Social Framework and Standards

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

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

ESS-1: Environmental and Social Assessment and Management

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

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

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

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

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

ESS-2: Involuntary Resettlement

The main objective of ESS-2 is "to avoid Involuntary Resettlement wherever possible; to minimize Involuntary Resettlement by exploring Project alternatives; where avoidance of Involuntary Resettlement is not feasible, to enhance, or at least restore, the livelihoods of all displaced persons in real terms relative to pre-Project levels; to improve the overall socioeconomic status of the displaced poor and other vulnerable groups; and to conceive and implement resettlement activities as sustainable development programs, providing sufficient resources to enable the persons displaced by the Project to share in Project benefits."

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

ESS-3: Indigenous Peoples

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

3.3.3 Air Quality Management

The Project will comply with the following international standards and guidelines:

- IFC General EHS Guidelines: Environmental Air Emissions and Ambient Air Quality (30.04.2007)
- AIIB ESS 1: Environmental and Social Assessment and Management
- Directive 2008/50/EC on Ambient Air Quality and Cleaner Air for Europe
- WHO Ambient Air Quality Guidelines (Global Update 2005).

The World Health Organization published a guideline for air quality with a global update for 2005. In this publication, there are interim targets for the certain pollutants such as particulate matter, nitrogen dioxide and sulfur dioxide. Moreover, IFC EHS Guideline for Air Emissions and Air Quality also refers to those limit values in its content. The recommended limit values are listed in the following Table.

Table 3-4. WHO Ambient Air Quality Guidelines IFC for Steel

Parameter	Units	Guideline Value
Particulate Matter	mg/Nm^3	20-50[a]
Oil Mist	mg/Nm^3	15
NO_x	mg/Nm^3	500 750 (coke oven)
SO_2	mg/Nm^3	500
VOC	mg/Nm^3	20
PCDD/F	ng TEQ/Nm3	0.1
Carbon Monoxide (CO)	mg/Nm^3	100 (EAF) 300 (coke oven)
Chromium (Cr)	mg/Nm^3	4
Cadmium (Cd)	mg/Nm^3	0.2
Lead (Pb)	mg/Nm^3	2
Nickel (Ni)	mg/Nm^3	2
Hydrogen Chloride (HCl)	mg/Nm^3	10
Fluoride	mg/Nm^3	5
Hydrogen Fluoride (HF)	mg/Nm^3	10
H_2S	mg/Nm^3	5
Ammonia	mg/Nm^3	30
Benzo(a)pirene	mg/Nm^3	0.1
Tar fume[b]	mg/Nm^3	5
Notes: [a] Lower value where toxic metals are present [b] Tar fume measured as organic matter extractable by solvent from total matter collected by membrane filter		

** IFC, Environmental, Health and Safety Guidelines, General EHS Guidelines: Environmental, Air Emissions and Ambient Air Quality*

3.3.4 Noise Management

IFC General Environmental, Health and Safety Guidelines sets limits for noise for two types of receptors and two time periods, as given in the following Table. The guideline requires that noise levels do not exceed the levels given in table or result in a maximum increase in background levels of 3 dB at the nearest receptor location off-site.

Table 3-5. IFC Noise Level Guidelines (One-hour Leq-dBA)

Receptor	Daytime (07:00 - 22:00)	Nighttime (22:00 - 07:00)
Residential areas	55	45
Commercial/industrial areas	**70**	**70**

3.3.5 Waste Management

The Project will comply with the requirements of the IFC Guidelines and AIIB ESS 1: Environmental and Social Assessment and Management in addition to the Turkish Environmental Legislation. The more stringent of national standards and applicable international standards will be followed. Applicable International Standards are as follows:

- IFC Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts,
- IFC Performance Standard 3: Resource Efficiency and Pollution Prevention,
- IFC Performance Standard 4: Community Health, Safety, and Security,
- IFC Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources,
- IFC General Environmental, Health and Safety Guidelines,
- IFC Environmental, Health and Safety Guidelines for Waste Management Facilities.

3.3.6 Contractor Management

International standards and guidelines will adopt for good and safety practices of contractors and subcontractors. IFC Performance Standards on Social and Environmental Sustainability, IFC General Environmental, Health, and Safety (EHS) Guidelines, AIIB ESS 1 and European Union requirements will be followed for minimizing and preventing any possible health and safety issues of workers and public.

3.3.7 Community Health and Safety Management

The international standards which the Project will implement are those set by the International Finance Corporation (IFC). All activities in the management and monitoring of community health and safety will comply with the following international standards and requirements. Applicable IFC standards and guideline requirements for OHS management within the scope of the Project are provided in the following references:

- IFC Performance Standards on Social and Environmental Sustainability
- IFC General Environmental, Health, and Safety (EHS) Guidelines
- IFC EHS Guidelines: Community Health and Safety
- IFC Good Practice Handbook: Use of Security Forces: Assessing and Managing Risks and Impacts
- AIIB ESS 1

The above standards and guidelines form a framework for the adoption of the best guidance for community health and safety to minimize damages, traffic accidents and injuries to project personnel and the public.

3.3.8 Biodiversity

3.3.8.1 IFC Performance Standard – 6

International standards which are mainly represented by the 2012 IFC Performance Standards and related Guidance Notes (GN), will be implemented in the Project. As determined during the risk and impact identification process, it was stated that if the project is likely to adversely affect ecosystem services, a systematic assessment should be carried out to identify the client, priority ecosystem services. **Since the project is in operational phase and any construction and earthworks is out of scope, there is no need to prepare the Biodiversity Management Plan in accordance with the requirements of IFC Performance Standard-6: Conservation of Biodiversity and Sustainable Management of Living Natural Resources**.

Legislations and International Conventions and Treaties that must be complied with and implemented if a Biodiversity Management Plan is required are given below.

3.3.8.2 International Conventions and Treaties

The national and international legislation, standards and guidelines are the key for the implementation of biodiversity management plan as well as the biodiversity studies and their results. Some of the conventions which Turkey is also a party, are listed below:

- The UN Convention on Biological Diversity (CBD) (1997) and Cartagena Protocol on Biosafety (2004),
- The European Landscape Convention (2001).
- The Convention on the Conservation of European Wildlife and Natural Habitats (BERN) (1984),

- The Convention concerning the Protection of the World Cultural and Natural Heritage (1983).

3.3.8.3 European Union Legislation

Regarding the conservation of the biological diversity, European Union (EU) has set 6 targets in the Biodiversity Strategy for 2020, which are: (1) Target 1: Conservation and restoration of the nature, (2) Target 2: Maintenance and enhancement of the ecosystems and their services, (3) Target 3: Ensuring of agriculture and forestry sustainability, (4) Target 4: Ensuring of sustainable usage of aquaculture resources, (5) Target 5: Combating of invasive alien species, and (6) Target 6: Addressing the global biodiversity crisis. In addition, there are two main EU directives, which are keystones of the natural conservation policy of Europe, those are:

- The Bird Directive (2009/147/EC)
- The Habitat Directive (92/43/EEC)

3.3.9 Cultural Heritage Management

This convention is known as the Valetta Convention. It sets guidelines for the funding of excavation and research work and publication of research findings. It also deals with public access, to archaeological sites, and educational actions to be undertaken to develop public awareness of the value of the archaeological heritage.

3.3.9.1 European Convention on The Protection of the Archaeological Heritage

Turkey is a signatory to The World Heritage Convention, which was approved by The General Conference of the United Nations Educational, Scientific and Cultural Organization (UNESCO), (1972, Paris). The signatories to this Convention have agreed to ensure that effective and active measures are taken for the protection, conservation, and presentation of the cultural and natural heritage of their territories.

3.3.9.2 Convention Concerning the Protection of the World Cultural and Natural Heritage

Turkey is a signatory to The World Heritage Convention, which was approved by The General Conference of the United Nations Educational, Scientific and Cultural Organization (UNESCO), (1972, Paris). The signatories to this Convention have agreed to ensure that effective and active measures are taken for the protection, conservation, and presentation of the cultural and natural heritage of their territories.

3.3.9.3 Other International Standards and Requirements

According to IFC's PS 8, the Project will avoid significant adverse impacts on cultural heritage. Quality Management Representative of the Project will develop provisions for managing chance finds with the procedure to be applied when cultural heritage is subsequently discovered. Any chance find will not be disturbed until an assessment by competent professionals is made and actions consistent with the requirements of this Performance Standard are identified.

3.4 Project Standards

The Project will adopt the most stringent standard of all the mentioned national and international standards.

4 MANAGEMENT CONTROLS AND MITIGATION MEASURES

4.1 Air Quality Management

The mitigation measures to be taken during the installation phase (and operation phase if necessary) are listed below:

- Access road and internal roads will be sprayed with water with water trucks to suppress dust, if required,
- Speed limitations will be enforced for vehicles,
- Vehicles will not be permitted to keep engines running while waiting to enter to the site or waiting on-site,
- Well and adequate maintained vehicles will be used, and regular maintenance of these vehicles will be ensured,
- National regulations related to air quality and air pollution control will be obeyed,
- Stakeholder Engagement Plan and Internal and External Grievance Mechanism Procedure will be implemented to collect complaints and suggestions of local people and workers through the Grievance Mechanism to be established during the lifetime of the Project.

4.2 Noise Management

Mitigation measures to be taken regarding noise management are set out separately for operation phase.

- Noise reducing insulation and special materials will be used for large components, where possible,
- The noise level can be reduced with the use of modern and advanced equipment, so it will be tried to use this equipment as much as it feasible,
- Equipment and units will be kept in good running order throughout the operational life of the Project through routine maintenance,
- Noise monitoring will be conducted in case of complaints for verification.

4.3 Waste Management

Waste Management includes management controls and mitigation measures to develop an approach to how to reduce the potential Environmental, Health and Safety (EHS) risks and impacts from waste generation, their consequences and reuse, preparation for recovery and finally how to mitigate. Hazardous and non-hazardous waste should always be separated. In cases where hazardous waste generation cannot be prevented; Focus should be on health, safety, and prevention of harm to the environment. The general waste management procedures for collection, transportation and disposal management activities are as follows:

- To eliminate waste generation as much as possible,
- To reduce waste generation at the source,
- Reusing waste and excess materials wherever possible,
- To recycle / recycle waste materials wherever possible,
- Make sure waste is disposed of by a licensed waste company or municipality.

4.3.1 Management Controls

Non-hazardous and hazardous wastes will be generated within the scope of the project activities. The following methods / approaches will be used for the management of these wastes to be generated in the field:

- Reducing waste generation (through management practices or prevention of material use, etc.)
- Separating non-hazardous wastes from hazardous wastes,
- Recycling of wastes and providing relevant training throughout the entire project activities,
- Separating wastes to be sent to licensed recycling / recovery companies on site according to their types,
- Minimizing the amount of hazardous material used,

- Providing appropriate transportation and management training to personnel for hazardous materials and wastes,
- Proper inspection of storage areas to detect damaged or leaking containers, if any,
- Preferring non-hazardous alternatives instead of dangerous goods as much as possible,
- Prevention of possible spills during equipment maintenance,
- Avoiding waste disposal in the field under all circumstances.

Zero waste management recommendation to minimize waste generation and increase recovery and reuse is given in Figure 4-1.

Figure 4-1 Zero Waste Hierarchy[1]

In line with legal requirements, a three-year industrial (hazardous and non-hazardous) waste management plan will be prepared and submitted to the Izmir Provincial Directorate of

[1] *https://zerowasteeurope.eu/*

Environment, Urbanization and Climate Change. It is obliged to fill in the waste declaration form using online applications prepared by the Ministry of Environment, Urbanization and Climate Change, starting from January every year to include the information of the previous year, until the end of March at the latest, to approve it, to print it and to keep a copy for five years.

Domestic wastes generated within the facility and specified in the table are disposed of in GRAY colored waste containers on which "Domestic Waste Container" is written. Domestic waste is not mixed with recyclable waste or hazardous waste. After the household wastes are collected from within the enterprise, the bags are tightly tied and thrown into the Municipal Garbage Containers so that the relevant municipality can receive them.

Packaging wastes are collected in its own part of the Temporary Waste Storage Area. It is given free of charge to recycling companies that have received a license from the Ministry of Environment and Urbanization after a certain accumulation rate. The environmental unit, purchasing and senior management make the contract with the company that will dispose of these wastes. Documents such as invoices, waybills, license documents are requested, indicating that the waste is given to a licensed company. One copy of these documents is also stored in the Peripheral unit.

It is given to recycling companies licensed by the Ministry of Environment and Urbanization and Climate Change with a fee. The environmental unit, purchasing and senior management make the contract with the company that will dispose of these wastes. Documents such as invoices, waybills, license documents are requested, indicating that the waste is given to a licensed company.

Grease and Contaminated glove litter are collected in its own part of the Temporary Waste Storage Area. For the grease entering the storage area, the Waste Label is affixed on the barrel and on the contaminated gloves and oak bags. After a certain accumulation rate (within 180 days), it is given to disposal companies that have received a license from the Ministry of Environment and Urbanization, by paying a price. The environmental unit, purchasing and senior management make the contract with the company that will dispose of these wastes. Documents such as invoices, waybills, license documents are requested, indicating that the waste is given to a licensed company.

Hydraulic oils and cables are collected in the Temporary Waste Storage Area in its own part. Waste Label is affixed on the hydraulic oil drums entering the storage area. After a certain

accumulation rate (within 180 days), it is given to disposal companies that have received a license from the Ministry of Environment and Urbanization, with a fee. The environmental unit, purchasing and senior management make the contract with the company that will dispose of these wastes. Documents such as invoices, waybills, license documents are requested, indicating that the waste is given to a licensed company.

Medical wastes are collected by İzmir Metropolitan Municipality with licensed vehicles. Fees are paid for these wastes.Mitigation Measures

Both hazardous and non-hazardous wastes will be generated in the field during the assembly and operation phases. The mitigation measures to be taken to minimize and control these wastes are described in Table 4-1 below

Table 4-1 Mitigation Activities

Activity	Control Description	Responsible Parties	Means of Verification
Waste Hierarchy	The waste management hierarchy follows the steps: - Waste avoidance and reduction at source, - Waste re-use and recycling, - Waste storage, treatment and/or disposal.	Health, Safety and Environment & Management Systems Chief Environmental Engineer All employees (including Contractors)	General Waste Management Procedures Workplace inspections
Waste Classification	All wastes will be classified according to the following criteria and based on internationally accepted regulations, guidelines, definitions, and methodologies: - Non-hazardous wastes (including domestic waste and inert waste) - Hazardous wastes - Recyclable wastes	Health, Safety and Environment & Management Systems Chief Environmental Engineer All employees (including Contractors)	General Waste Management Procedures Workplace inspections

Activity	Control Description	Responsible Parties	Means of Verification
Waste Segregation and Storage	Wastes will be segregated at their sources of generation and will be stored at isolated areas with safety and security measures, on concrete paved grounds with spill control measures. All hazardous wastes will be stored safely for a maximum of 6 months and will be sent to a licensed disposal facility by licensed transportation vehicles as per national and international requirements.	Health, Safety and Environment & Management Systems Chief Environmental Engineer All employees (including Contractors)	General Waste Management Procedures Workplace inspections Contract agreements with licensed companies
Waste Recycling	All recyclable wastes will be sorted and will be transferred to the facilities operated by licensed recycling contractors.	Health, Safety and Environment & Management Systems Chief Environmental Engineer All employees (including Contractors)	General Waste Management Procedures Recycling facility conditions to comply with the EHS legislation

Activity	Control Description	Responsible Parties	Means of Verification
Waste Disposal	All wastes will be sent for disposal or treatment for recycling and disposal by licensed waste management contractors. Domestic wastes will be collected the Municipality. Burning of waste is forbidden.	Health, Safety and Environment & Management Systems Chief Environmental Engineer All employees (including Contractors)	General Waste Management Procedures Workplace inspections
Waste Inventory	Waste register will be kept for the generated wastes: amount of the wastes generated for different types of wastes, final destinations and types of hazardous wastes and amounts stored temporarily on the site.	Management Systems Manager Health, Safety and Environment & Management Systems Chief Environmental Engineer	Monthly EHS Reports
Spill Management	Spill management materials and contaminated soils will be classified and managed according to their hazardous material contents. Soils and spill kits contaminated by hazardous wastes and hazardous materials will be treated as hazardous wastes and will be managed accordingly.	Health, Safety and Environment & Management Systems Chief Environmental Engineer All employees (including Contractors)	General Waste Management Procedures Emergency Preparedness and Response Plan

4.4 Contractor Management

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

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

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

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

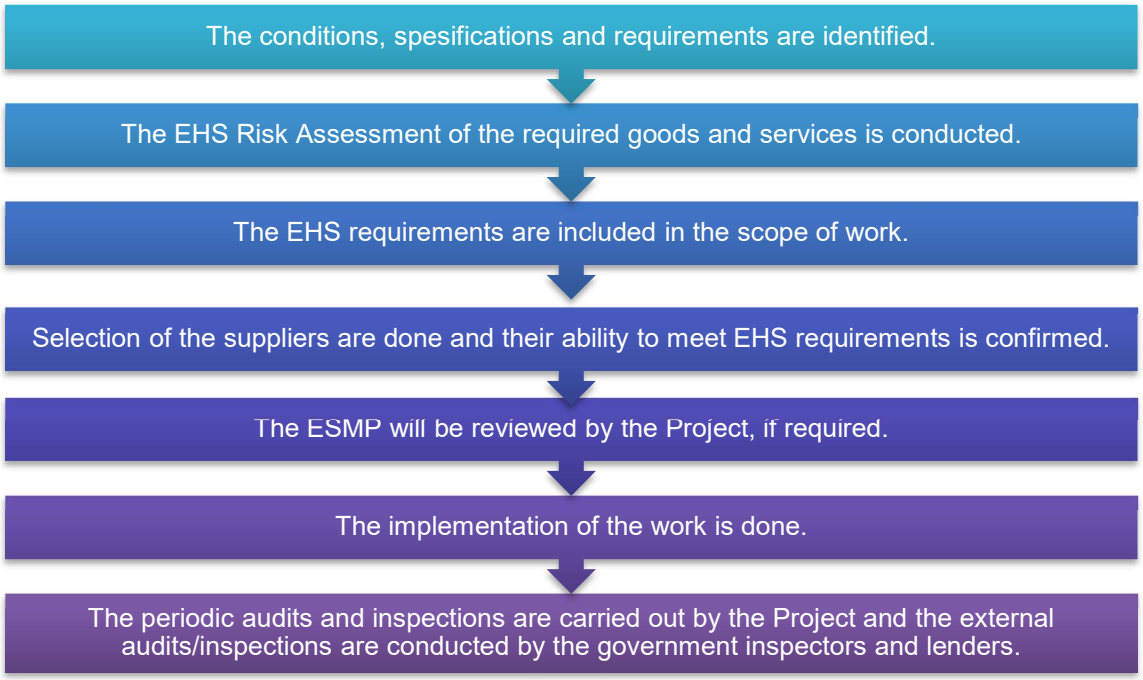

Figure 4-2. Process of Contractor Management

4.4.1 Requirements of Contractor Management

All contractors and subcontractors will be responsible for compliance of the Project Standards. Existing labor practices and EHS systems of contractors are important criteria to evaluate contractor performance. New contractor selection and agreements should consider this evaluation. Identification of SoW and relation to Project Standards should be assessed. If there are any existing contractors, these contracts should be reviewed for consistency of implement of Environmental and Social requirements in all activities of the Project.

Below Table 4-2 summarizes the management control requirements. The Project will implement these requirements to manage the contractors and ensure alignment and compliance with the Project Standards and requirements.

Table 4-2.Contractor Management Requirements of the Project

Requirement	Implementation	Means of Verification
A process must identify and evaluate the risks associated with the planned procurement of materials, equipment, services, and labor, including an assessment of the risks of non-compliance or non-conformance with the Project Standards.	▰ Development of scope of work using SoW checklist ▰ Performing risk assessment, if required	Scope of work and risk assessment (if required)
A process must be used for evaluation of a supplier's ability to provide materials, equipment and/or services that meet the defined specifications, design criteria and Project Standards. Evaluations and any related actions must be documented.	▰ Evaluation of bids ▰ Assessment against the Project Standards	Evaluation of bids
The required specifications must be met by all materials, equipment, services, and labor procured or supplied for the control of EHS, community and compliance risks associated with their intended use or activity, as identified in the risk assessment process.	▰ Evaluation of bids ▰ Assessment against the Project Standards ▰ Assessment against the risk assessment	Verification of EHS hazard identification responses by bidders

Requirement	Implementation	Means of Verification
A registration must be kept for hazardous materials (preferably with a link to an inventory system) that are approved for use onsite. This register must be available, referred to, and maintained to control the purchase and introduction of new materials. All hazardous materials introduced by the contractors or visitors must also be included on or evaluated against this register.	➢ Provision of the MSDS to Health, Safety and Environment & Management Systems Chief & OHS Expert for verification	Register of hazardous materials
The properties of all materials (including their process intermediates, by-products, and wastes) must be adequately understood, documented, and integrated into the operating procedures where exposure to their properties presents a significant risk to the EHS performance. Legally compliant Material Safety Data Sheets (MSDS) must be available before the delivery and use of such materials (including products).	➢ Provision of the MSDS to Health, Safety and Environment & Management Systems Chief & OHS Expert for verification	MSDS
The management process of the contractors includes the following phases: 1. Selection of contractors, 2. Preparation of contractors, 3. Orientation and training, 4. Contractor management, 5. Post-evaluation. Individuals engaged in a temporary or casual basis to work within existing businesses/managed sites are to be inducted and managed in the same way as employees.	➢ Contractor Management Process	Review of the records

Requirement	Implementation	Means of Verification
For all contracted labor or service agreements, there must be an agreed scope of work, which will include an analysis of the risks associated with the activities to be performed by the Contractor, including an assessment of the risks of non-compliance or non-conformance with the Project Standards. The extent of the risk assessment required will be determined during the scope of the work development process but will include, as a minimum, a hazard identification of the EHS, community and compliance risks as set out in the SoW template.	▰ Development of scope of work using SoW template ▰ Performing risk assessment, if required	SoW and risk assessment (if required)

4.4.2 Key Procurement and Contractor Management Stages

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

Table 4-3 given below summarizes the key procurement at each stage. These are the actions undertaken by the Project to ensure that the activities are properly specified, resourced, managed, and supervised to be following the Project requirements and Project Standard.

Table 4-3. Key Procurement Activities

Qualification and Sourcing	Supplier Preparation	Mobilization	Work Management	Review and Close Out
Actions				
▪ Sole Source ▪ Purchase requisition ▪ Purchase order ▪ Competitive ▪ Create SoW ▪ Risk assessment and establishment of relevant the Project contractual requirements ▪ Pre-qualification ▪ SoW issued to bidders ▪ Tender clarifications ▪ Tender evaluation ▪ Contracting ▪ Purchase order	▪ Prepare tender ▪ On the award, prepare ESMP	▪ Send vehicles, tools, and equipment to the site for inspection ▪ Workers to attend training ▪ Provide details of supervisors and company emergency contacts	▪ Monitor work permits ▪ Supervise activities ▪ Track time and exposure hours ▪ Run pre-start meetings ▪ Ensure work is carried out safely ▪ Check and audit activities ▪ Communicate regularly	Provide feedback on performance
Process Tools				
▪ Purchase requisition form ▪ SoW template ▪ EHS and social risk assessment ▪ The Project EHS and Social Management Plans	▪ SoW ▪ The Project Standard ▪ EHS Requirements ▪ Template for worker, equipment & tools lists	▪ Equipment and tools lists ▪ Equipment and tools checklist	▪ Standard work ▪ Procedures ▪ Job Hazard Assessment ▪ Work permits system ▪ Regular inspection checklist	Demobilization checklist after operation phase (for long-term contractors and suppliers)

4.5 Community Health and Safety Management

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

Private security personnel are authorized for routine controls and their responsibility is to report the non-compliances to Management Systems Manager, Health, Safety and Environment & Management Systems Chief, OHS Expert and Local Authorities. The table below presents the key management controls that will be implemented.

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

Phase	Control Description	Responsible Parties	Means of Verification
Change in traffic density impacting other road users			
Operation	▰ Identify and install all necessary traffic warning signs within the access roads. ▰ Prepare and provide driver safety training for drivers and operators. ▰ Develop and implement a Road Safety Awareness Program for local communities. ▰ Maintain vehicles in periodic verification inspections will be undertaken. ▰ Set zero limits for alcoholic beverages and illegal drugs.	▰ SRS ▰ Health, Safety and Environment & Management Systems Chief ▰ Management Systems Manager	HS Records Training Records
Community Engagement			
Operation	▰ Local communities, workers and suppliers will be informed on the main security arrangements implemented and on security rules	▰ SRS ▰ Health, Safety and Environment & Management Systems Chief ▰ Management Systems Manager	Consultation minutes with stakeholders

Phase	Control Description	Responsible Parties	Means of Verification
Public Access to Project Area			
Operation	▰ Continue to implement measures to discourage unauthorized entry onto the Project Site, ▰ Hiring security presence and security personnel, ▰ Provide security cameras if required, ▰ Ensure that those providing security services are adequately trained in the use of force and appropriate conduct toward workers and Affected Communities. ▰ Visitor admission is required sign-in at the security gate. ▰ Recording the license plates of the visitors' and personnel's vehicles.	▰ SRS ▰ Health, Safety and Environment & Management Systems Chief ▰ Management Systems Manager ▰ General Manager ▰	Grievance records Security records
Community Health, Safety and Security			
Operation	▰ Any person under the influence of alcohol or illegal drugs will not be permitted to enter the Installation/Office Site ▰ Gambling, firearms, alcoholic beverages, illegal drugs, and explosives will not be permitted at the office/ Installation site	▰ Private Security Personnel ▰ Administrative Affairs Responsible	Security Records Routine Inspections
Life and Fire safety			
Operation	▰ In case of off-site emergency, or an off-site accident (emergency case relevant to life and fire safety), which may affect the local settlements communication with local authorities given in the Emergency and Preparedness	▰ OHS Expert ▰ Health, Safety and Environment & Management Systems Chief	Incident Reports

Phase	Control Description	Responsible Parties	Means of Verification
	Management Plan will be conducted by Social Responsibility Staff under the supervision of Management Systems Manager.	▪ Management Systems Manager ▪ SRS	

4.6 Biodiversity Management

Biodiversity studies were carried out by the relevant experts within the scope of the project. The project area is included in:

- The protected areas in accordance with the "Convention on the Protection of the Mediterranean Sea Against Pollution" (Barcelona Convention) published in the Official Gazette dated 12/6/1981 and numbered 17368,
- The areas designated as "Special Protection Area" in our country in accordance with the "Protocol on the Protection of Special Protection Areas in the Mediterranean" published in the Official Gazette dated 23/10/1988 and numbered 19968,
- The protection of "Cultural Heritage" and "Natural Heritage", which was taken under protection by the Ministry of Culture in accordance with the 1st and 2nd articles of the "Convention on the Protection of the World Cultural and Natural Heritage", which was published in the Official Gazette dated 14/2/1983 and numbered 17959

In summary, the project area is not within the areas protected by legal legislation such as National Park, Nature Protection Area, Wildlife Development Area, Wild Animal Settlement Area, Nature Park, Nature Monument, Ramsar Area and Special Environmental Protection Area. However, the project is located in the boundaries of Foça Peninsula KBA Other nearest KBAs are Gediz Delta and Yamanlar Mountain located approximately 15 km and 17 km away from the project area, respectively.

The nearest KBAs are shown in the following Figure 4-3.

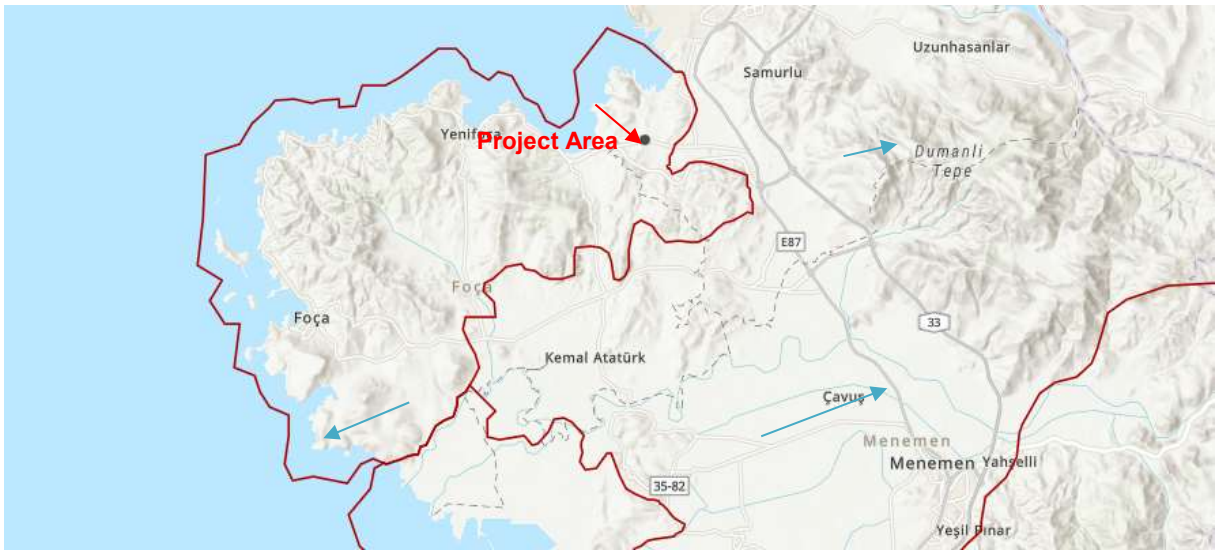

Figure 4-3 Key Biodiversity Area Covering Project Area

The KBA that is Foça Peninsula is located on the east coast of the İzmir Bay entrance and within the provincial borders of İzmir and consists of indented coves, capes and islands and islets in their offshore. There are six islands within the boundaries of the KBA, namely İncir, Fener, Orak, Metelik, Haysız and Kartdere. As you move inland from the coast, the geography gradually rises. Except for the town of Foça, the coasts are generally far from human habitation and consist of rocky areas.

The mainland part of the KBA is covered with maquis communities and red pine forests. Foça hills have a rough surface structure due to the stream beds that dry up in summer. There are scrub communities and bare rocky areas on the islands. The coasts generally have a rocky morphology and there are also sandy beaches in places.

The islands within the KBA are breeding and sheltering areas for the lesser kestrel (Falco naumanni), the crested cormorant (Phalacrocorax aristotelis desmarestii), the peregrine falcon (Falco peregrinus) and the small tern (Sterna albifrons). Island falcons (Falco eleonorae) are rarely observed on the islands during the migration period.

The KBA is one of the rare areas inhabited by the striped hyena (Hyaena hyaena), which has decreased in number in the Aegean Region. As a result of field studies conducted in the area for many years, it has been observed that nine individuals of the Mediterranean monk seal (Monachus monachus), which is endangered on a global scale, breed.

Since some of the bays between Foça and Yeni Foça are opened to tourism, the KBA is faced with the threat of intense coastal construction. There is a risk that the cooperative and summer

house construction on the shores of New Foça will move westward (to Aslan Burnu). If this happens, the habitats of the Mediterranean monk seal will be destroyed. Before the area became a Special Environmental Protection Area (SEPA), some fish farms started operating with permission.

Baby seals that breed in the KBA or may come to the region from outside are caught in fishing nets and these cause deaths. Due to the intensification of marine traffic in recent years, a decreasing trend has been observed in the use of the area by Mediterranean monk seals. Hunting on the islands has led to the decline of some wild species such as partridges.

Since 1993, research, protection, monitoring and public opinion formation studies have been carried out in the area, especially regarding the Mediterranean monk seal.

In addition to its contributions to field conservation, field studies have provided the collection of very important data on the life cycle and biology of the species. An inspection boat allocated by the Ministry of Environment in 1992 carries out inspections in the marine area in cooperation with Foça Municipality and Foça Fisheries Cooperative.

Since the anthropogenic impact level is high in and around the project area, fauna species distributed in the area have left the area before. Existing species consist of species adapted to anthropogenic effects. In addition, it is anticipated that the impact of the activity on fauna species will be at a minimum level since the project is in its operational phase and any construction and earthworks are not planned in the scope of the Project. However, in case of any potential land use extension in the scope of the project realized, Biodiversity Action Plan need to be developed.

4.7 Cultural Heritage Management

With its history dating back to the Ancient Greeks and Hellenic Civilization, Aliağa's prominent historical values include its ancient cities. The Ancient City of Aigai, known as the place where the Hellenic civilization lived, the Ancient City of Kyme, an ancient Amazon city, and the Ancient City of Gryneion, one of the 12 Aeolian cities, are some of the ancient cities here.

The vicinity of the project area is surrounded by cultural heritage assets as in Figure 4-4, below.

Figure 4-4 Nearest Cultural Heritage Area

Kyme, (Cyme, Cymi, Phrikonis) is one of the Aeolian cities in the region called Aiolis in Antiquity. Today, it is located near the Aliağa district of İzmir province in Turkey, and the small bay on which it is located is called Nemrut Bay.

Kozbeyli village has different architectural examples of tower houses.

The basic definitions regarding the management of cultural heritage are given as follows:

- Ministry of Culture and Tourism is the responsible authority.
- Museum Directorate is responsible to provide experts for the sites within 24 hours after being informed and to officially define the Chance Find. Museum directorate is responsible from the excavation of chance find areas. Museum Directorate will follow the directions and decisions from Regional Board Directorate of Protection of Cultural Heritage.
- Regional Board Directorate of Protection of Cultural Heritage is the only decision maker on any intervention, which would be made on the site after the chance find.
- Kocaer is responsible for the management of archaeological issues during the progress of construction (if there any planned in the future as expansion) of the Project site area and implementation of related management plan and chance find procedure.
- If necessary, Kocaer will employ archaeologists at the Project site responsible for the monitoring of ground disturbance activities. Also, In the case of an archaeological

excavation to be conducted by İzmir Museum Directorate, an archaeologist will be employed. They are also responsible with the monitoring of the implementation of the Cultural Heritage Management and Chance Finds Procedure.

- Kocaer will ensure that Chance Finds Procedure is adequately enforced during ground disturbance activities. During the implementation of the Chance Finds Procedure on site, Kocaer will directly report the issue to Museum archaeologist and relevant Regional Preservation Board.
- Kocaer is also responsible for giving necessary trainings to the field staff about the implementation of the chance find procedure.
- Kocaer will record all chance finds on the Chance Finds Report Form (*see Annex J*) and in the Chance Finds Register (*see Annex K*) as per the Chance Find Procedure given in Annex I.

The Project will be responsible for the management of the plan and procedure about archaeological issues of Project site. The Quality Management Representative of the Project will train the employees about cultural heritage and Chance Finds Procedure and monitor the construction works, if there any.

In case of any construction activities, the Health, Safety and Environment & Management Systems Chief will work with the equipment operators and have the authority to stop work. Operators will stop work or redirect stripping activities in case of a chance finds and submit special reports of chance finds to Health, Safety and Environment & Management Systems Chief and Environmental Engineer. In addition to the Chance Find Procedure (*see Annex I*), the İzmir Regional Board Directorates will decide for the requirement of a salvage excavation. The contact information of this board directorate is given in *Annex* L. The negotiations and meetings with the related Regional Board Directorate of Protection of Cultural Heritage on technical topics during and after the salvage excavation will be held by Health, Safety and Environment & Management Systems Chief, Environmental Engineer or a Consultant archaeologist (is necessary).

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

5 MONITORING

5.1 Review and Revision of this Plan

During the steady state operations, this ESMP will be reviewed on an annual basis and any necessary revisions will be made in the Plan to reflect the changing circumstances or operational needs of the Project. Any revisions to this Plan will be uploaded to the Project DCC to ensure that all the Project staff has access to the latest version of this Plan.

5.2 Overview of Monitoring Requirements

The monitoring measures that are to be implemented during operation phase to assess compliance of the Project with the relevant Project Standards are described in this section. If any non-conformances with the Project Standards are identified, these will be investigated, and appropriate corrective actions will be put forward.

5.3 Key Performance Indicators (KPIs)

Key Performance Indicators (KPIs) for each topic of this Plan is given in Table 5-1.

Table 5-1. Key Performance Indicators (KPIs)

Topic	KPI	Target
Air Quality Management	% of test results compliant with legal standards related to air quality	To minimize air pollution and achieve continuous improvement in air quality
	Number of complaints (for the Project and contractors) received related to dust, and/or odor	To minimize air pollution and achieve continuous improvement in air quality
	% of non-compliances related to dust, and/or odor which are closed within agreed timeframe	To minimize air pollution and achieve continuous improvement in air quality
Noise Management	% of test results compliant with legal standards	To minimize noise during operation and minimize nuisance in local communities
	Number of tests carried out near sensitive receptors	To minimize noise during operation and minimize nuisance in local communities
	Number of complaints related to noise	To minimize noise during operation and minimize nuisance in local communities
Waste Management	Number of reported waste incidents and non-compliances	To minimize and achieve continuous improvement in reducing the number of the reported non-compliances with this Plan
	Volume of waste generated and sent to off-site landfill	To minimize and achieve continuous improvement in reducing the total volume of the waste generated
	Percentage of waste materials recycled	To minimize and achieve continuous improvement in reducing disposal to landfill

Topic	KPI	Target
	Number of community complaints	To minimize and achieve continuous improvement in reducing the number of the waste-related community complaints.
Contractor Management	Number of the reported EHS incidents of the contractors	To reduce and accomplish continuous improvement in the number of the reported EHS incidents of the contractors
	Number of the recorded community grievances related to the contractors	To reduce and accomplish continuous improvement in the number of the recorded community grievances related to the contractors
	Number of the kick-off meetings held versus the number of the contractors selected	Number of the kick-off meetings held versus the number of the contractors selected will be at least the same
	Number of complaints received by supply chain workers	To reduce the number of complaints
	Number of complaints gathered from contractors' workers	To reduce the number of complaints
	Number of contractors' site audits and document control audits performed in a month	To perform at least one contractors' site and document control audits monthly
	Number of non-compliances determined during the site and document audits of the contractors	To reduce the number of non-compliances
Community Health and Safety Management	Total number of non-compliances with community health safety & security measures identified in "Key Management Controls" of this Plan.	To minimize and target zero per annum
	Number of community health safety & security complaints (related to air, noise, dust, traffic etc.) from local communities (external) as recorded in the grievance management system	To minimize and continued improvement in number of community health safety and security related complaints
	Number of solved community health safety and security complaints (related to air, noise, dust, traffic etc.) from local communities (external) as recorded in the grievance management system	Continued improvement in number of solved external grievances within the established timeframe and with the satisfaction of the complaint
	Number of reported community health & safety incidents	To minimize and target zero per annum
	Number of reported traffic incidents involving community members	To minimize and target zero per annum
	Number of reported noise and vibration incidents	To minimize and continued improvement in number of reported noise and vibration related incidents.
	Number of communicable and non-communicable diseases and injuries	No significant increase in communicable and non-communicable disease and injury rates.

Topic	KPI	Target
	% of community received community safety training	80 %
	% of visitors received Visitor Training	100 %
	Number of drivers and community members involved in road safety training sessions	Continued improvement in the number of drivers and community members involved in road safety training sessions
	% of certification of the drivers / operations	%100
Cultural Heritage	The number of complaints related to cultural heritage raised by local communities per year including contractors' activities.	To investigate every complaint raised about cultural heritage (desecration, disturbance, removal, trafficking) and take appropriate action. To provide rapid response and investigation of any complaints or concerns from local communities and act in the target timeframe.

5.4 Key Monitoring Activities

The table below summarizes the key performance indicators and associated key monitoring actions that can be used to assess the progress and effectiveness of the proposed mitigation strategies.

Table 5-2. Key Monitoring Measures

Activity	Monitoring Indicator	Monitoring Method	Responsible Staff	Monitoring Period	Monitoring Location
Dust and exhaust emissions control	% of test results compliant with legal standards	▪ Exhaust emission certificates will be checked annually. ▪ Test results will be checked with the Project standards for dust emissions.	Health, Safety and Environment & Management Systems Chief & Environmental Engineer	Annual	All project vehicles Near sensitive receptors

Activity	Monitoring Indicator	Monitoring Method	Responsible Staff	Monitoring Period	Monitoring Location
Dust and exhaust emissions control	Observation of dust	Visual observation of significant dust	Health, Safety and Environment & Management Systems Chief Environmental Engineer	Routine site audits	Project area
Installation noise of machinery and equipment	% of test results compliant with legal standards	Noise measurements at sensitive receptors	Health, Safety and Environment & Management Systems Chief Environmental Engineer SRS	In case of any complaint	Sensitive receptors
Transportation noise	% of test results compliant with legal standards	Noise measurements at sensitive receptors	Health, Safety and Environment & Management Systems Chief Environmental Engineer SRS	In case of any complaint	Sensitive receptors
Operational noise	% of test results compliant with legal standards	Noise measurements at sensitive receptors	Health, Safety and Environment & Management Systems Chief Environmental Engineer SRS	In case of any complaint	Sensitive receptors

Activity	Monitoring Indicator	Monitoring Method	Responsible Staff	Monitoring Period	Monitoring Location
Compliance of EHS Management Plans of Contractors	% compliance	Preparation of Scorecard/ Report Audit records Grievance records Minutes of kick-off meetings Medical examinations	Health, Safety and Environment & Management Systems Chief Environmental Engineer SRS	During operational phase	Project Site
Community Safety	Number of recorded security incidents involving the Project workers and members of the local population	Security Record Grievance Records	Health, Safety and Environment & Management Systems Chief Environmental Engineer SRS Administrative Affairs Responsible	Annually during operation	Project affected places
Traffic and transport	Number of employee members involved in road safety training sessions	Training Records	Health, Safety and Environment & Management Systems Chief OHS Expert	Annually during operation	Project affected places
Community Security	Monitor the performance of security personnel using a range of indicators.	Grievance mechanism, Grievance Records related to security personnel	Health, Safety and Environment & Management Systems Chief Environmental Engineer	Monthly	Project site

Activity	Monitoring Indicator	Monitoring Method	Responsible Staff	Monitoring Period	Monitoring Location
			SRS Administrative Affairs Responsible		

6 TRAINING

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

- Legal HS and vocational training,
- First aid training and emergency response team members training,
- Worker’s representative training,
- HS technical training (confined space, working at height, etc.),
- Visitor training, driving training and other training such as:
  - Additional training for the workers who had occupational accidents or diseases to inform them about the reasons for the accident or disease, ways to protect themselves and safe working methods,
  - Refresher training before returning to work for the workers who are away from work for any reason for more than six months.

6.1 Induction Training

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

6.2 Job Specific and Other Training

All employees of the Project and the contractors working at the Project site are expected to attend routine safety briefings. The procurement staff will be provided contract management

training and other job-specific training that may be required. The worker qualifications and training records will be collected from the contractors to verify competency and manage staff competency as part of the contractor engagement processes.

7 AUDIT AND REPORTING

7.1 External Auditing

To assess the conformance with this Management Plan, it will be subject to periodic assessment as part of the Project audit program and separately by the Project Lenders. It will increase the efficiency of this management plan and performance of the project will be effectively boosted.

7.2 Record Keeping and Reporting

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

ANNEXES

Annex A: Aspects and Impacts Register

Annex B: Incident Register Form

Annex C: Air Quality Register

Annex D: Noise Register

Annex E: HS Checklist

Annex F: Minimum Document List to be Submitted by Contractors

Annex G: Incident Form

Annex I: Chance Finds Procedure

Annex J: Chance Finds Report Form

Annex K: Chance Find Register

Annex L: Contact Information of Related Museum Directorates and Regional Board Directorates

Annex A: Aspects and Impacts Register

ASPECTS and IMPACTS REGISTER				
Reporting Period:				
Activity	**Aspect**	**Impact**	**Mitigation**	**Related Documentation**

Annex B: Incident Register Form

INCIDENT REGISTER
Reporting Period: _____

Total of incidents	
To date	This Reporting Period

Total of incidents to date	
Open	Closed

Date Raised	Contractor Registration Number	Location	Incident Summary	Actions		Close Out		Comments
				Corrective Actions	Auctioneer	To Close By	Actual Close out Date	

Annex C: Air Quality Register

AIR QUALITY REGISTER												
Location	**Date Sample Taken**	**Sample No**	**Sampled by**	**Parameters**								
				Dust (visual assessment)	**PM_{10}**	**$PM_{2.5}$**	**SO_2**	**NO_2 / NOx**	**CO**	**O_3**	**Lead**	**Benzene**
				Limits								
					20 µg/m³ (year)	**10 µg/m³ (year)**	**20 µg/m³ (year)**	**30 µg/m³ (year)**	**10 mg/m³ (daily 8 hr average)**	**100 µg/m³ (daily)**	**0.5 µg/m³ (yearly)(LTH)**	**5 µg/m³ (yearly)**

Annex D: Noise Register

NOISE REGISTER
Reporting Time: _____

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

Annex E: HS Checklist

KOCAER	**İŞ GÜVENLİĞİ KONTROL LİSTESİ (HS CHECK LIST)**	**Type of Document**: Check List **Form ID**: **Date**: **Reference Document**: *(Name of the previous file goes here)* **Version**: 01 **Edition**: 01

Yüklenici/Contractor	Tarih/Date	Yapılacak iş /Work detail	Çalışma Alanı / Work Field

No	Konu/Subject	Var(Y)	Yok(N)	Açıklama/Description
1	Çalışanların nüfus kağıtları fotokopileri var mı? / Are there copies of the employee ID card?			
2	Çalışanların görev kağıtları var mı? / Do the employees have duty papers?			
3	Çalışanların mesleki yeterlilik belgeleri var mı? / Do employees have professional qualification documents?			
4	Çalışanların işyeri hekim tarafından verilmiş periyodik muayene raporu var mı? / Do employees have a periodic inspection report issued by the workplace doctor?			
5	Çalışanların temel İSG eğitim sertifikaları var mı? / Do employees have basic OHS training certificates?			
6	Çalışılacak bölgeye ait riskler ekip ile paylaşıldı mı? Kayıt edildi mi? / Were the risks of the region to be studied shared with the team? Is it registered?			
7	Ekip İSG sorumlusu personelin adı? / Name of the staff responsible for the team OHS?			

8	Çalışma izni formu doldurulmuş mu? / Is the work permit form filled?			
9	Çalışılacak bölgede gerilim var mı? Var ise özel önlem neler alındı? / Is there any conflict in the area to be worked? If yes, what were the special measures taken?			
10	Toolbox yapıldı mı? / Is toolbox done?			
14	Gözlemci olarak tayin edilen personelin Adı-Soyadı-Görevi? / Name-Surname-Position of the personnel appointed as Observers?			

İşletme Sorumlusu	Kontrol Eden Ekip Şefi	Ekip Çalışanı	İşletme Sorumlusu
(Adı ve Soyadı)	(Adı-Soyadı-Görevi-İmza) / (Adı-Soyadı-Görevi-İmza)	(Adı-Soyadı-Görevi-İmza)	(Adı ve Soyadı)

Annex F: Minimum Document List to be Submitted by Contractors

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

Annex G: Incident Form

The purpose of this form is to define the reason for investigating an incident or near misses.

INCIDENT FORM		
Details of the incident/near miss:	**Date of incident:**	**Time of incident:**
Short description of the incident / near miss: *Please describe in detail the causes of the incident to identify any risks and hazards.*		
Area where incident / near miss occurred:		

Details of the incident/near miss investigation:	
Name of injured person (if relevant):	Injury sustained (if relevant):
Name of the person who reported the incident:	Date of report:
Name of person completing this form:	
Telephone number:	Date report completed:

Witness details:	
Name's/Job title (if relevant):	Contact number:
Name of person/s conducting the investigation Job title (if relevant):	Contact number:

Immediate causes / Contributing Causes that may have been a factor to the accident/incident	
What preventative action could have been taken? Why was this action not taken?	
How much experience did the employee have in the task/s that was being performed when the accident/incident occurred? What training has been provided?	
What is the chance of the accident/incident occurring again?	

Full description of events. **Who was involved: Worker/Student/ Visitor/ Contractor?** *Briefly describe what happened including the sequence of events, investigate the scene of the incident or near miss; conditions present at the time of incident; what was involved, what activity (if any) was taking place prior and at time of the incident. What hazards was the worker exposed to? What hazards may have contributed to the incident occurring? (Attach photos if available)*

INVESTIGATION RECOMMENDATIONS Outline recommended corrective action/s (i.e. solution/s) to prevent the recurrence of the incident **eg. new equipment, re-engineer, re-design work area, re-design work practices, review training standards, etc**		
Investigators Recommendation	**Person to Action**	**Completion date**

IMPLEMENTATION DETAILS			
Date implemented	**Action taken**	**Responsible person**	**Review Date**

Investigators Name: **Date:**

Attachments: e.g. photos, instructions, etc.

Annex I: Chance Finds Procedure

1. PURPOSE

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

2. SCOPE

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

3. PROCEDURE

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

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

- All construction and other relevant activities in the vicinity of the chance find will be ceased by the Kocaer Environmental Engineer or Consultant Archaeologist (if required) of the Project or anyone, who encounters a chance find.
- The Kocaer Environmental Engineer will contact the General Manager as soon as a chance find is encountered.
- The Kocaer Environmental Engineer contacts museum directorate archaeologist immediately.
- Kocaer Environmental Engineer of the Project will properly secure chance find the site via flagging, no-entry signs, etc. and prevent/limit the vehicle traffic within the immediate vicinity of chance find and protect the site by not moving, removing or further disturbing the chance find.

- Boundaries of discovered archaeological site coordinates will be recorded and the photograph of the location and the finding shall be taken, and video record should be made.
- The site and its vicinity will be secured against damage or loss until a final decision is made about this site by Board.
- Kocaer Environmental Engineer of the Project will fill out Part A of Chance Find Form and send a copy to Museum archaeologist within 24 hours keeping a hard copy for the Project as a record and registering a copy to Document Control Centre (DCC),
- If any human remains such as a contemporary grave or graveyard are noticed, security forces will be informed. Unless the remains are determined to be recent, the local administration (village head: mukhtar, or district governor) has the full authority.
- Further steps to be followed and proper procedures to be implemented for the management of the finding(s) (changes in the layout, conservation, preservation, restoration, or salvage) will be decided and reported in writing by the Museum Directorate.
- In case the site is considered to be of no significance by the Museum Directorate, the Kocaer Environmental Engineer will inform the Construction Manager and they will inform their managers. Subsequent of filling out Part B of Chance Find Form by Kocaer Environmental Engineer of the Project within 24 hours while retaining a copy of the Chance Find form as a record, the construction works will proceed since no further actions are required.

In case the site is considered as significant by the Museum Directorate, the Kocaer Environmental Engineer will be informed by the Museum Directorate about the decision on further actions. The Kocaer Environmental Engineer will inform the construction manager and their managers. Subsequent of filling out Part B of Chance Find Form by Kocaer Environmental Engineer of the Project within 24 hours while retaining a copy of the Chance Find form as a record, the instructions of the Museum Directorate will be followed. After some field investigation, Museum Directorate will declare their decision on the significance of the site, and the actions to be followed as per their decision are summarized in the following table.

Site to be of No Significance	Site to be of Minor Significance	Site to be of Major Significance
• The Kocaer Environmental Engineer will inform their managers, • The Kocaer Environmental Engineer will record the decision in Part C of Chance Find Form within 24 hours, • The Kocaer Environmental Engineer will retain a copy of Chance Find form as a record, • No further actions will be required, • This step closes out the chance find procedure, • Construction activities may resume.	• A salvage excavation is to be completed • Museum Directorate will provide instructions, and/or supervision for salvage archaeological excavation the Kocaer Environmental Engineer • The Kocaer Environmental Engineer will inform their managers, • Under the guidance of Museum archaeologist (following instructions from other authorities, İzmir Regional Board, etc.), the Project will provide a team of qualified archaeologists to conduct the salvage excavation, • Once the excavation is completed, Environmental Engineer of the Project will provide a report to Project Manager, • The The Kocaer Environmental Engineer will provide a report to the Museum Directorate, • Regional Board Directorate of Protection of Cultural Heritage will officially confirm the completion of recovery and inform the Kocaer Environmental Engineer, • The Kocaer Environmental Engineer will inform the Top Management that no further actions are required, • The Kocaer Environmental Engineer will inform other managers, • The Kocaer Environmental Engineer will record the decision in Part C of Chance Find Form within 24 hours, • The Kocaer Environmental Engineer will retain a copy of Chance Find form as a record, • No further actions will be required, • This step closes out the chance find procedure • Construction activities may resume.	• Excavation is to be completed, • The site will be treated according to “Law on the Conservation of Cultural and Natural Property (2863)”, • Museum Directorate will provide instructions, and/or supervision for salvage archaeological excavation to the Kocaer Environmental Engineer, • the Kocaer Environmental Engineer will inform the top Management, • Once the excavation is completed, The Kocaer Environmental Engineer of the Project will provide a report to Top Management, • the Kocaer Environmental Engineer will provide a report to the Museum Directorate, • Regional Board Directorate of Protection of Cultural Heritage will officially confirm the completion of recovery and inform the Kocaer Environmental Engineer, • Site will be officially recorded and protected according to Turkish regulations, • The Kocaer Environmental Engineer will inform the Project Manager that no further actions are required, or that a relocation is required, • The Kocaer Environmental Engineer will record the decision in Part C of Chance Find Form within 24 hrs., • The Kocaer Environmental Engineer will retain a copy of Chance Find form as a record, • No further actions will be required, • This step closes out the chance find procedure, • Construction activities may resume, or relocation is implemented.

Annex J: Chance Finds Report Form

To be filled out in English (İngilizce doldurunuz.)

PART A **BÖLÜM A**		
Location: *Mevkii*	Date: *Tarih*	ID:
Name of person reporting chance find: *Rastlantısal buluntuyu rapor eden kişinin ismi*		
Name of contractor employee contacted: *İletişime geçilen yüklenici çalışanı ismi*		
Was work stopped in the immediate vicinity of chance find? *Rastlantısal buluntunun tam çevresinde iş durduruldu mu?*	☐ Yes *Evet*	☐ No *Hayır*
Was a buffer zone created to protect chance find? *Rastlantısal buluntuyu korumak için tampon bölge oluşturuldu mu?*	☐ Yes *Evet*	☐ No *Hayır*
NOTIFICATION ***(BİLDİRİM)***		
Contractor construction manager contacted *Yüklenici inşaat müdürü ile irtibata geçildi*	☐ Yes *Evet*	☐ No *Hayır*
The Environmental Engineer contacted *Projenin Çevre Mühendisi ile iletime geçildi*	☐ Yes *Evet*	☐ No *Hayır*
CHANCE FIND DETAILS ***(RASLANTISAL BULUNTU AYRINTILARI)***		
GPS coordinates *GPS koordinatları*	Photo record ☐Yes ☐No (HD quality – no cell phone photos) *Fotoğraf kaydı Evet Hayır* *(HD kalitesinde – cep telefonu fotoğrafı değil)* If not, explain why: *Yok ise nedenini açıklayınız* Other records ☐Yes ☐ No Specify (drawings, HD quality videos, etc.): *Diğer kayıtlar Evet* *Hayır Belirtin* *(çizimler, HD kalite videolar, vb.)*	
Description of chance find: *Rastlantısal buluntunun tanımı*		
Description of site and vegetation: (e.g. surface sediment type, ground surface visibility, distance to closest watercourse, etc.) *Sahanın ve bitki örtüsünün tanımı: (örn. Yüzey sediman türü, yüzey zemin görünürlüğü, en yakın suyoluna olan mesafe, vb.)*		

PART B ***BÖLÜM B***	
NOTIFICATION OF_____MUSEUM DIRECTORATE ARCHAEOLOGIST ***(_____MÜZE MÜDÜRLÜĞÜ ARKEOLOĞUNA BİLDİRİ)***	
Kocaer Environmental Engineer contacted museum directorate archaeologist *Projenin Çevre Mühendisi ,müze müdürlüğü arkeoloğu ile irtibata geçti.* Date of notification: *Bildirim tarihi* Name of museum directorate archaeologist: *Müze müdürlüğü arkeoloğunun ismi* Contact number of museum directorate archaeologist: *Müze müdürlüğü arkeoloğunun iletişim numarası*	☐Yes ☐No ☐Evet ☐Hayır
DECISION OF_____MUSEUM DIRECTORATE ARCHAEOLOGIST ***(_____MÜZE MÜDÜRLÜĞÜ ARKEOLOĞUNUN KARARI)***	
Date of initial investigation: *İlk araştırma tarihi*	
☐ Site of no significance - Construction to proceed with no further investigation – End of chance find procedure *Önemsiz saha – İnşaat daha fazla araştırma yapılmadan devam edilebilir – rastlantısal buluntu prosedürün sonu.* Date of notice to resume work: *İşe başlama tarihi bildirisi*	☐ Site of significance - Further investigation required *Önemli saha – Ek araştırma gerekmektedir* Fill out Part C *Bölüm C'yi doldurun.*
Name of museum directorate archaeologist: *Müze müdürlüğü arkeoloğunun ismi* Contact information: *İletişim numarası*	
The Kocaer Environmental Engineer contacted *Projenin Çevre Mühendisi ile irtibata geçildi*	☐ Yes *Evet* ☐ No *Hayır*

PART C ***BÖLÜM C***		
FURTHER FIELD INVESTIGATION ***(EK SAHA ARAŞTIRMASI)***		
☐ Site of no significance *Önemsiz saha*	☐ Site of minor significance *Az önemli saha*	☐ Site of major significance *Çok önemli saha*
Describe additional work to be conducted: *Yapılması gereken ek işlerin tanımlayın*		
Date started: *Başlangıç tarihi*	Date completed: *Bitiriş tarihi*	
Date of notice to resume work: *İşe başlama tarihi bildirisi*		
Name of museum directorate archaeologist: *Müze müdürlüğü arkeoloğunun ismi:* Contact information: *İletişim numarası*		
The Project Top Management contacted *Projenin Üst Yönetimi ile irtibata geçildi*	☐ Yes *Evet*	☐ No *Hayır*
The Kocaer Environmental Engineer contacted *Projenin Çevre Mühendisi ile irtibata geçildi*	☐Yes *Evet*	☐No *Hayır*

Annex K: Chance Find Register

CHANCE FIND REGISTER
Reporting Period:

Total of chance find	
To date:	**This reporting Period:**

ID (*)	DATE OF CHANCE FIND	LOCATION	CHANCE FIND SUMMARY	NAME OF AUTHORITY NOTIFIED	DATE PART A COMPLETED	DATE PART B COMPLETED	DATE PART C COMPLETED	ACTION TAKEN	STATUS OPEN OR CLOSED	REMARKS
KOCAER 1										
KOCAER 2										
KOCAER 3										
KOCAER 4										

(*) Keep same ID format

Annex L: Contact Information of Related Museum Directorates and Regional Board Directorates

Museum Contact Information

Name:	Contact Detail:	Address:
Museum Directorate of İzmir	**0 (232) 489 07 96** **izmirmuzesi@ktb.gov.tr**	Halil Rıfat Paşa Caddesi No: 4 Konak/İZMİR

Contact Information of Regional Board Directorates

Name:	Contact Detail:	Address:
İzmir No. 2 Regional Board of Conservation of Cultural Heritage	**(0232) 464 81 60** **izmir2kurul@ktb.gov.tr**	TCDD Alsancak Yerleşkesi Umurbey Mahallesi 1491 Sokak No:4 Alsancak/İZMİR

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