

APPENDIX – A: Environmental and Social Action Plan (ESAP)

ESAP Ref. No.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, IFC PSs, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
PS1 Assessment and Management of Environmental and Social Risks and Impacts							
1.1	<p>Preparation and implementation of ESMS documents in line with project-specific national and international standards.</p> <p>Preparation of an organizational chart that includes all contractors / subcontractors and suppliers. In addition, the appointment of appropriate persons for the duties and responsibilities specified in the ESMS documentation created in this organizational chart.</p>	<p>Preventing / minimizing environmental and social risks.</p> <p>Ensuring compliance with national legislation and international standards.</p> <p>Ensuring that contractors / subcontractors and suppliers implement the prepared ESMS and strictly monitor their compliance</p>	<p>national legislation</p> <p>IFC PS1</p> <p>best practices</p>	<p>It is necessary to ensure that all Project employees (including, contractor / subcontractor and suppliers) are involved in the implementation.</p> <p>Required resources: -Adequate financial and human resources for implementation - Include ESMS-related requirements in contractor/subcontractor and supplier contracts - Participation of independent certification and audit companies</p>	<p>October 2021</p> <p>Before entering the operational phase</p>	<p>Project specific ESMS</p> <p>Contracts/agreements with contractors/subcontractors and suppliers that include requirements for the implementation of the Project ESMS in force</p> <p>Valid ISO certificates</p>	
1.2	<p>Full implementation and monitoring of the ESAP.</p> <p>Submission of the monitoring report on the monitoring of the ESAP every 6 months during</p>	<p>Ensuring compliance with local legislation and IFC PSs.</p>	<p>ESAP</p>		<p>During the loan term during the construction and operation phases</p>	<p>ESAP Monitoring Reports to be submitted bi-annually during the procurement and installation phase</p>	

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	<p>the procurement and assembly phase and once a year during the operation phase.</p> <p>Providing regular information about complaints and non-compliances.</p>					and annually during the operation phase	
1.3	<p>Preparation and implementation of the Human Resources Policy covering rights such as equal opportunity, mutual agreement and freedom of association.</p> <p>Sharing all prepared environmental and social policies with all stakeholders</p>	<p>Ensuring full compliance with national legislation and international standards</p> <p>Preventing / minimizing environmental and social risks</p>	<p>national legislation</p> <p>IFC PS1</p> <p>IFC PS2</p> <p>IFC PS4</p> <p>ILO Standards best practices</p>	<p>Required resources:</p> <p>-Adequate financial and human resources for implementation</p> <p>- Including Human Resources Policy requirements in contractor/subcontractor and supplier contracts</p>	<p>October 2021</p> <p>Throughout the life of the project</p>	<p>Employee contracts</p> <p>Applicable Policies</p> <p>Complaints from internal and external stakeholders</p>	
1.4	<p>Conducting a Cumulative Impact Assessment that includes traffic management issues</p>	<p>Identifying all environmental risks, evaluating cumulative effects and taking relevant preventive/reducing measures</p>	<p>IFC PS1</p> <p>best practices</p>		<p>October 2021</p>	<p>Cumulative Impact Assessment Report</p> <p>Project-specific ESMP</p>	
1.5	<p>Preparation and implementation of the Project-specific Environmental and Social Management Plan</p> <p>Sharing the prepared ESMP with the contractor /</p>	<p>Ensuring full compliance with national legislation and international standards</p> <p>Preventing / minimizing environmental and social risks</p>	<p>national legislation</p> <p>IFC PS1</p> <p>IFC PS2</p> <p>IFC PS3</p> <p>IFC PS6</p>		<p>September 2021</p> <p>Throughout the life of the project</p>	<p>Monitoring the key performance indicators given in the project-specific ESMP and plan</p> <p>Monitoring the ESMP compliance</p>	

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	<p>subcontractor and suppliers, and</p> <p>Preparation of the OHS Handbook</p> <p>Revising and implementing existing Plans to include mitigation measures and monitoring elements, details of roles and responsibilities, frequency of monitoring, and key performance indicators</p>					of contractors / subcontractors and suppliers.	
1.6	<p>Establishing and maintaining an organizational structure (OHS-E Manager, Social Responsibility Personnel, Human Resources Representative, etc.) that defines the roles, responsibilities and authority to implement the ESMS.</p> <p>Giving the contractor / subcontractor and suppliers in the created organization chart.</p>	<p>Continuing compliance with applicable national legal requirements and IFC PSs</p> <p>Ensuring effective and sustained environmental and social performance through the implementation of the ESMS</p>	<p>IFC PS1</p> <p>best practices</p>	<p>What you need: Ensure that competent E&S personnel are involved in the Project for the implementation of the ESMS (all Project employees, including all contractors / subcontractors and suppliers)</p>	<p>September 2021</p> <p>Throughout the life of the project</p>	<p>Established organizational structure with key environmental and social personnel(s) positions, including Project Company and contractors/subcontractors and suppliers</p>	
1.7	<p>Revision of the currently implemented Emergency Action Plan to cover public health and safety issues, as well as the issue of Covid-19 and Epidemics.</p>	<p>Compliance with national legislation and international standards.</p> <p>Ensuring the health and safety of all project stakeholders (employee and local people).</p>	<p>IFC PS1</p> <p>IFC PS2</p> <p>IFC PS4</p>		<p>September 2021</p>	<p>Revised Emergency Action Plan.</p> <p>Reports evaluating the performance of contractors /</p>	

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	Establishing clear emergency communication with contractor/subcontractor and suppliers.					subcontractors and suppliers. ESAP Monitoring Reports (every 6 months during the procurement and assembly period, annually during the operation period) Complaints from internal and external stakeholders	
1.8	Preparation and implementation of the Grievance (internal and external) Mechanism Procedure. (The Grievance Mechanism Procedure should be considered a living document and updated regularly and as needed.) Uploading the Prepared Grievance Mechanism Procedure to the project owner's website.	Appropriate stakeholder engagement, sharing and management of information with stakeholders.	IFC PS1		September 2021 Throughout the life of the project	grievance record database Grievance (internal and external) Mechanism Procedure ESAP Monitoring Reports	
PS2 Labor and Working Conditions							
2.1	Creation of Human Resources Policy In its HR Policy,s commitment to mutual	Please refer to. Ref. No. 1.3					

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	agreement and respect for the freedom of association of its employees and its commitment not to discourage workers who want to join any union.						
2.2	Adding and updating the topics to Business Contracts <ul style="list-style-type: none"> ➤ Responsibilities of the personnel, ➤ prohibitions, ➤ Work conditions, ➤ Reward and discipline rules ➤ The right to unionize and organize 	Ensuring full compliance with national legislation and international standards. Prevention of social distress.	national legislation IFC PS2 ILO standards		September 2021	sample employee contract	
2.3	Preparing an OHS Handbook that includes the following topics and clearly stating the duties and responsibilities in the handbook: <ul style="list-style-type: none"> ➤ OHS Policy ➤ OHS in production ➤ medical checkups ➤ Incident / Accident Investigation Procedure ➤ Control procedure of subcontractors 	Ensuring full compliance with national legislation and international standards.	National Legislation IFC PS2 ISO 14001 ISO 45001		September 2021	OHS Handbook	

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2.4	Revising existing Risk Assessment Reports to include public health issues.	Ensuring full compliance with national legislation and international standards.	national legislation IFC PS2		September 2021	Revised Risk Assessment Reports	
2.5	Providing Environmental and Social Entry Trainings to all Project employees, including contractor/subcontractor and supplier employees, as part of the ESMS. Giving Job Specific Trainings to all personnel assigned within the scope of ESMS.	Ensuring environmental and social awareness of all Project personnel. Ensuring an effective ESMS implementation.	IFC PS2		October 2021	Contents of the training provided Training records and minutes	
PS3 Resource Efficiency and Pollution Prevention							
3.1	Recording water, diesel and energy consumptions on resource efficiency and submitting them in ESAP Monitoring Reports.	Ensuring resource efficiency.	IFC PS3		September 2021 Throughout the life of the project	Resource efficiency records	
3.2	Performing periodic vehicle inspections and exhaust emission measurements and keeping records	Protection of air quality. Reducing greenhouse gas emissions.	national legislation IFC PS3		September 2021	Vehicle inspection records Complaint database records	
3.3	Preparation of a Waste Management Plan to cover hazardous and non-hazardous wastes in accordance with national legislation and IFC standards	Ensuring full compliance with national legislation and international standards. Protection of air quality.	national legislation IFC PS3		October 2021	Waste Management Plan Monthly Environmental and Social Report	

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						Contractor / subcontractor supplier evaluation reports Field observation reports	
PS4 Community Health and Safety							
4.1	Preparation of an Environmental and Social Management Plan, including Traffic Management. Include public health and safety issues in the current Emergency Action Plan.	Ensuring full compliance with national legislation and international standards. Protection of employee and public health.	national legislation IFC PS4		September 2021	Compliance and non-compliance with key performance indicators specified in the Public Health Safety Plan and Traffic Management Plans Complaint database records	
4.2	Preparation of Security Personnel Instruction and Visitor Procedure.	Ensuring full compliance with national legislation and international standards. Preventing / minimizing social problems that may arise from security personnel	national legislation IFC PS4		September 2021	Visitor Procedure records Complaint database records Security personnel training and certification records	
PS5 Land Acquisition and Involuntary Resettlement							

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5.1	Preparation and implementation of the Internal and External Grievance Mechanism Procedure	Please refer to. Ref. No. 1.8					
PS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources							
6.1	Preparation and implementation of the Waste Management Plan	Ensuring full compliance with national legislation and international standards. Conservation of biodiversity and living natural resources	national legislation IFC PS6	Contractors/ Sub-contractors	October 2021	Atık Yönetimi Planı	
PS7 Indigenous People							
7.1	N/A						
PS8 Cultural Heritage							
8.1	N/A						