

ANNEX-A: Environmental and Social Action Plan

ESAP Ref. No.	Action	Environmental and Social Risks (Responsibility / Benefits)	Requirement (Legislation, IFC PSs, Best Practice)	Resources, Investment Needs, Responsibility	Timeline	Target and Evaluation Criteria for Successful Implementation	Situation
PS1 Assessment and Management of Environmental and Social Risks and Impacts							
1.1	<p>Developing existing ESMS documents and preparing and implementing ESMS documents that comply 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 the contractor / subcontractor and suppliers implement the prepared ESMS and strictly monitoring 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, contractors / subcontractors and suppliers) take part in the application.</p> <p>Resources needed: -Sufficient financial and human resources for implementation - Include ESMS related requirements in contractor / subcontractor and supplier contracts - Participation of independent certification and audit companies</p>	March 2021	<p>Project specific ESMS</p> <p>Contracts / agreements with contractors / subcontractors and suppliers that contain requirements for the implementation of the Project ESMS in place</p> <p>Valid ISO certificates</p>	

1.2	Full implementation and monitoring of the ESAP. Submission of a monitoring report every 6 months during the construction phase and once a year during the	Ensuring compliance with local legislation and IFC PS.	ESAP		During the loan term in the construction and operation phases	ESAP Monitoring Reports to be submitted twice a year during the construction phase and once a year	
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	operation phase regarding the monitoring of the ESAP. Regularly providing information on complaints and non-conformities.					during the operation phase	
1.3	Preparation and implementation of the Human Resources Policy covering rights such as equal opportunities, mutual agreement, and freedom of association. Sharing all environmental and social policies prepared with all stakeholders	Ensuring full compliance with national legislation and international standards Preventing / minimizing environmental and social risks	National legislation IFC PS1 IFC PS2 IFC PS4 ILO Standards Best practices	Resources needed: -Sufficient financial and human resources for implementation - Including the requirements of the Human Resources Policy in contractor / subcontractor and supplier contracts	March 2021	Employee contracts Policies in effect Grievances from internal and external stakeholders	

1.4	Conducting a Cumulative Impact Assessment that includes air quality, noise and traffic management issues.	Determining all environmental risks, evaluating cumulative impacts and taking relevant preventive / mitigating measures	IFC PS1 Best practices		First half of 2021	Cumulative Impact Assessment Report Project-specific ESMP	
1.5	Preparation and implementation of the projectspecific Environmental and Social Management Plan Sharing the prepared ESMP with the	Ensuring full compliance with national legislation and international standards Preventing / minimizing environmental and social risks	National legislation IFC PS1 IFC PS2 IFC PS3 IFC PS6		February 2021 During the construction and operation phases	Monitoring of project-specific ESMP and key performance indicators given in the plan.	

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	contractor/subcontractor and suppliers Preparation of OHS Handbook Revision and implementation of existing Plans to include mitigation measures and monitoring elements, details of roles and responsibilities, monitoring frequency and key performance indicators				Making the revision stated in the current plans: March 2021	Tracking contractor / subcontractor and suppliers' ESMP compliance.	

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 contractor / subcontractor and suppliers in the organization chart created.</p>	<p>Continuous compliance with applicable national legal requirements and IFC PSs</p> <p>Ensuring effective and continuous environmental and social performance through the implementation of the ESMS</p>	<p>IFC PS1</p> <p>Best practices</p>	<p>Requirements: Ensure 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>March 2021</p> <p>During construction and operation</p>	<p>Organizational structure established with key environmental and social staff (s) positions, including the Project Company and contractors / subcontractors and suppliers</p>	
1.7	<p>Revision of the Emergency Action Plan currently being implemented to include public health and safety issues and Covid-19 and Epidemics.</p>	<p>Compliance with national legislation and international standards.</p>	<p>IFC PS1</p> <p>IFC PS2</p> <p>IFC PS4</p>		<p>March 2021</p> <p>During construction and operation</p>	<p>Revised Emergency Action Plan.</p> <p>Reports evaluating the performance of</p>	

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	Establishing clear emergency communication with contractor / subcontractor and suppliers.	Ensuring the health and safety of all project stakeholders (employees and local people).				contractor / subcontractor and suppliers. ESAP Monitoring Reports (every 6 months during the construction period, once a year during the operation period) Grievance from internal and external stakeholders	
1.8	<p>Prepare and implement a Stakeholder Engagement Plan, including the grievance (internal and external) mechanism. (The SEP should be considered as a living document and updated regularly and as needed.)</p> <p>Uploading the prepared SEP and Grievance Mechanism Procedure to the website of the Project owner.</p> <p>Organizing Stakeholder Engagement Meetings with the affected communities at</p>	Appropriate stakeholder engagement, information sharing and management with stakeholders.	IFC PS1		<p>Preparation of SEP and Grievance Mechanism Procedure: March 2021</p> <p>First Stakeholder Engagement Meeting: March 2021</p> <p>Stakeholder Engagement Meeting Before</p>	<p>Grievance registration database</p> <p>Stakeholder Engagement Plan</p> <p>Grievance (internal and external) Mechanism Procedure</p> <p>ESAP Monitoring Reports</p>	

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	the milestones of the project (starting construction, transition to operation, etc.).				Transition to Business: July 2021	Stakeholder Engagement Meeting records.	
PS2 Labour and Working Conditions							
2.1	Establishing a Human Resources Policy, 's commitment to respect employees' mutual agreement and freedom of association in its HR Policy and a commitment to its determination not to discourage workers who want to join any trade union.	See. Ref. No. 1.3					
2.2	Adding union rights of all employees to Contract of Employment	Ensuring full compliance with national legislation and international standards. Preventing a social distress that may be experienced.	National legislation IFC PS2 ILO Standards		March 2021	Sample employee contract	

2.3	Preparing an OHS Handbook containing the following topics and clearly defining duties and responsibilities in the handbook: <ul style="list-style-type: none"> ➤ OHS Policy ➤ OHS in Production ➤ Medical checks ➤ Incident / Accident Investigation Procedure 	Ensuring full compliance with national legislation and international standards.	National legislation IFC PS2 ISO 14001 ISO 45001		March 2021	OHS Handbook	
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	Control procedure of subcontractors						
2.4	Revision of the existing Risk Assessment Reports to include public health issues.	Ensuring full compliance with national legislation and international standards.	National legislation IFC PS2		March 2021	Revised Risk Assessment Reports	
2.5	Providing Environmental and Social Entry Trainings to all Project employees, including contractor / subcontractor and supplier employees, within the scope of the ESMS. Providing Job-Specific Trainings to all personnel	Ensuring environmental and social awareness of all Project personnel. Ensuring an effective ESMS implementation.	IFC PS2		First quarter of 2021 Once a year refresher	Content of the trainings provided Training records and minutes	

	assigned within the scope of the ESMS.						
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PS3 Resource Efficiency and Pollution Prevention

3.1	Regarding resource efficiency, recording water, diesel and energy consumption and submitting them in ESAP Monitoring Reports.	Ensuring resource efficiency.	IFC PS3		During construction and operation	Resource efficiency records	
3.2	Taking dust measurements in sensitive receptors. Periodic vehicle inspections and taking exhaust emission measurements.	Maintaining air quality. Reducing greenhouse gas emissions.	National legislation IFC PS3		First quarter of 2021 During construction and operation	Air quality measurement reports Vehicle inspection records	

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						Grievance database records	

3.3	Prepare and implement an ESMP including air quality issues (including contractor / subcontractor and suppliers)	Ensuring full compliance with national legislation and international standards. Maintaining air quality	National legislation IFC PS3		February 2021 During construction and operation	ESMP Monthly Environmental and Social Report Contractor / subcontractor supplier assessment reports Field observation reports	
PS4 Community Health, Safety and Security							
4.1	Preparation of Public Health Safety Plan and Traffic Management Plan. To include public health and safety issues into the current Emergency Action Plan.	Ensuring full compliance with national legislation and international standards. Protection of employee and public health.	National legislation IFC PS4		March 2021 During construction and operation	Compliance and non-compliance with key performance indicators specified in the Public Health Safety Plan and Traffic Management Plans Grievance database records	
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4.2	Preparation of Safety Management Plan	Ensuring full compliance with national legislation and international standards. Prevention / minimization of social problems that may arise from security personnel	National legislation IFC PS4		March 2021 During operation and construction	Compliance and non-compliance with key performance indicators specified in the Safety Management Plan Complaint database records Security personnel training and certification records		
PS5 Land Acquisition and Involuntary Settlement								
5.1	Preparation and implementation of the Stakeholder Engagement Plan	See Ref. No. 1.8						
PS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources								
6.1	Disposal of excavation to national legislation and phase in accordance with construction disposal Biodiversity and resources	Ensuring full compliance with National occur during the international standards. records national legislation conservation of IFC PS6	legislation and	construction Contractor / subcontractors international	During standards	Excavation living natural		
PS7 Indigenous People								
7.1	N/A							
PS8 Cultural Heritage								
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8.1	Processing of cultural heritage and chance finds issues in Environmental and Social Entry Trainings	Ensuring full compliance with national legislation and international standards. Protection of cultural heritage	National legislation IFC PS8	Contractor / subcontractors	The first quarter of 2021	Training records and reports	
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