

8 Environmental and Social Action/Management Plan (ESAP)

Score the indicator as follows and provide brief justification.

EC	Exceeding Compliance: The project has gone beyond the expectations of IFC PSs requirements. Lenders should be able to use projects rated EC as a role model for positive Environmental and Social effects.
FC	Fully Compliant: The project is fully in compliance with IFC PSs requirements, and EU and local environmental, health and safety policies and guidelines.
PC	Partial Compliance: The project is not in full compliance with IFC PS requirements, but has systems, processes or mitigation measure in place which are working towards addressing the deficiencies.
MN	Material Non-compliance: The project is not in material compliance with IFC PS requirements, and the systems, processes and mitigation measures in place are not working towards addressing the deficiencies.
NA	Not Applicable

No.	Subject	Action	Environmental & Social Risks (Liability/ Benefits)	Requirement (Legislative, IFC PSs, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Score
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PS1 Assessment and Management of Environmental and Social Risks and Impacts								
1.1	Environmental and Social Management System(ESMS)	<p>Development and implementation of environmental, social and health and safety related management plans</p> <p>Development and implementation of ESMS in line with international guidelines (ISO 9001: 2008, ISO 14001: 2004, OHSAS 18001: 2007, ISO 45001:2018, ISO 50001)</p> <p>Establishment of organizational structure for implementation of ESMS</p> <p>Training of employees on environmental and social subjects.</p>	<p>Legal compliance</p> <p>Compliance with international guidelines</p> <p>Reduction of ESMS risks</p>	<p>IFC PS1/PS2 Best practices</p> <p>IFC General EHS Guidelines Local Legislation</p>	<p>Responsible</p> <p>Resource: Staff, Time</p>	<p>Continuous</p>	<p>ESMS policy</p> <p>ESMS with ESMS documentation (risk assessment, control forms, plans, procedures, etc.)</p> <p>Roles and responsibilities for ESMS with assignment of team</p> <p>ESMS plans and procedures</p> <p>ESMS records (audit, measurements, etc.)</p> <p>Training logs</p>	<p>FC</p>

1.2	Licenses, permits, certificates	Development and implementation of legal and other requirements procedure Having Follow up list for legal and other requirements Securing all necessary license, permit and certificates	Compliance with local legislation	Local Legislation IFC PS 1	Responsible: Resource: Staff, Time	Within legal periods	Legal and other requirements compliance procedure and follow up list Copies of licenses, permits, certificates	PC
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No.	Subject	Action	Environmental & Social Risks (Liability/ Benefits)	Requirement (Legislative, IFC PSs, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Score
1.3	Information Disclosure Stakeholder Engagement Grievance	Develop and implement stakeholder engagement plan Communication list announcement Timely Responses to grievances Corrective action in case of need Record keeping for information disclosure	Good communication with stakeholders	IFC PS1/ PS 4	Responsible: Resource: Staff, Time, budget	December 2021 Continuous	Stakeholder engagement plan Grievance mechanism Information disclosure records Meeting minutes with stakeholders Corrective action logs	PC
PR2 Labor and Working Conditions								
2.1	Local Employment Policy	Develop and implement policies to support local employment	Protection of rights	IFC PS2 Labor Law	Responsible: Resource: Staff, Time	May 2021 Continuous	Copies of policies Service and goods purchasing records	PC

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2.2	Contractors	<p>Involvement of HR policy, ESAP requirements to contractor contracts</p> <p>Development of contractor management plan</p> <p>Approved contractor list</p> <p>Employment of contractor employees in line with HR policies including grievance mechanism awareness</p> <p>Keeping records for accidents and non-compliances</p>	<p>Maintenance of safe working environment for contractors and improvement of environmental and social management system</p>	IFC PS1/PS2	<p>Responsible:</p> <p>Resource: Staff, Time</p>	<p>January 2021</p> <p>Continuous</p>	<p>Contractor Management Plan</p> <p>Contractor contracts</p> <p>Approved contractor list</p> <p>Accident logs</p> <p>Incompliance logs</p> <p>Staff files</p> <p>EHS records</p>	PC
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							Grievance logs	

2.3	Human Resources	<p>Development of HR policy and notification of all staff</p> <p>Development of HR Management Plan</p> <p>Personnel contracts with working conditions, hours, HS responsibilities</p> <p>SGK records for all staff</p> <p>Keeping personnel files with contracts, health reports, training records, contact information, etc.</p> <p>keeping information log for age, SGK numbers, ID card numbers, address, gender, etc.</p>	Maintenance of human resources in line with the requirements	IFC PS1/PS2 Local legislation	<p>Responsible:</p> <p>Resource: Staff, Time</p>	Continuous	<p>HR Policy</p> <p>HR Management Plan</p> <p>Organization Chart</p> <p>Labor contracts</p> <p>SGK Records</p> <p>Personnel files</p>	FC
2.4	Employee Grievance	<p>Development and implementation of employee grievance mechanism</p> <p>Timely response to grievances</p> <p>Taking corrective action whenever needed</p>	Good communication and successful environmental and social management system	IFC PS2	<p>Responsible:</p> <p>Resource: Staff, Time, budget</p>	<p>January 2021</p> <p>Continuous</p>	<p>Documented staff grievance mechanism</p> <p>Action planning and grievance logs</p>	PC

2.5	Health and Safety	Development and implementation of Health and safety plan with Risk assessment, periodical	Maintenance of safe working environment	IFC PS2 IFC SEÇ Guidelines Local legislation	Responsible: Resource: Staff, Time, budget	The existing system shall continue for the site with taking the opportunities for improvement	Health and safety plan Risk Assessment	FC
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		controls, industrial hygiene measurements, PPE Develop and implement training for visitors, contractors, and staff Keeping records for incidents Compliance with HS legislation					Audit records Training records for visitors, contractors, and staff Incident logs Corrective action logs	
PS3 Resource Efficiency and Pollution Prevention								

3.1	Waste	<p>Development and implementation of waste management plan</p> <p>Waste collection, transfer, tagging, and recycling system</p> <p>Disposal of waste to licensed facilities according to their types</p> <p>Presence of waste storage area</p> <p>Agreement with licensed transportation and disposal companies</p> <p>Site controls to increase awareness</p> <p>Research on alternative uses of wastes</p> <p>Waste records</p>	<p>Legal compliance</p> <p>Environmental protection</p>	<p>IFC PS3</p> <p>Local Legislation</p> <p>Best Practice</p>	<p>Responsible:</p> <p>Resource: Staff, Time, and Budget</p>	<p>Continuous</p>	<p>Waste management plan</p> <p>Communication with authorities</p> <p>Waste disposal records</p> <p>Audit records</p> <p>Training records</p>	<p>FC</p>
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		Trainings						

3.2	Soil, Surface Water and Groundwater	<p>Implementation of following plans</p> <ul style="list-style-type: none"> • Chemical management plan • Emergency response plan • Waste management plan <p>Execution of training and drills</p> <p>Field control to improve site conditions</p>	<p>Legal Compliance</p> <p>Protection of environment</p>	<p>IFC PS3</p> <p>Local Legislation</p> <p>Best Practice</p>	<p>Responsible:</p> <p>Resource: Staff and time</p>	Continuous	<p>Periodical field control records</p> <p>Records of response equipment</p> <p>Training and drill records</p>	FC
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3.3	Chemicals and Hazardous Materials	<p>Chemical management plan development and implementation</p> <p>Presence of chemical inventory</p> <p>Presence of MSDS</p> <p>Presence of PPE</p> <p>Trainings for staff</p> <p>Measures at field</p> <p>Storage of chemicals at designated areas</p> <p>Fire safety measures at storage and consumption location</p>	<p>Legal compliance</p> <p>Safe and environmentally friendly working environment</p>	<p>IFC PS3 Local Legislation Best Practice</p>	<p>Responsible:</p> <p>Resource: Staff, Time</p>	<p>Continuous</p>	<p>Audit records</p> <p>Chemical inventory</p> <p>MSDS</p> <p>Incident records</p> <p>Training records</p>	<p>FC</p>
3.4.	Wastewater	<p>Development and implementation of wastewater management plan</p>	<p>Compliance with legislation and best practice.</p>	<p>IFC PS3 Local Legislation Best Practice</p>	<p>Responsible:</p>	<p>Continuous</p>	<p>Wastewater management plan</p>	<p>FC</p>

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		<p>Operation of wastewater treatment plant</p> <p>Monitoring of discharge quality</p>			Resource: Staff, Time and Budget		Analysis results	
3.5	Air Quality	<p>Emission reports</p> <p>Greenhouse gases follow</p>	<p>Compliance with legislation and best practices</p> <p>Protection of environment</p>	IFC PS 1, PS3 Local Legislation	<p>Responsible:</p> <p>Resource: Staff, Time and Budget</p>	<p>Continuous</p> <p>Carbon footprint: December 2021</p>	<p>Field control records</p> <p>Third party emission reports</p> <p>Maintenance and calibration reports of machinery</p> <p>Greenhouse gas studied.</p> <p>Training records for awareness</p>	PC

3.6	Pollution Prevention	<p>Preparation and implementation of following plans</p> <ul style="list-style-type: none"> • Chemical management plan • Emergency response plan • Waste management plan • Wastewater management plan <p>Presence of spill kits at designated location with guidelines to use</p> <p>Environmental trainings to staff and contractors</p>	<p>Compliance with legislation and best practices</p> <p>Protection of environment</p>	<p>IFC PS3</p> <p>Local Legislation</p>	<p>Responsible:</p> <p>Resource: Staff, Time and Budget</p>	<p>Continuous</p>	<p>Records of site control</p> <p>Presence of response equipment</p> <p>Implementation of documentation</p> <p>Audit and control records</p> <p>Records of environmental incidents</p>	FC
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							<p>Measurement and analysis records</p> <p>Records of disposal</p> <p>Training records</p>	

3.7	Environmental Incidents	Record keeping for environmental incidents and related actions Environmental emergency response plan preparation and implementation Presence of response equipment	Legal and best practice compliance	IFC PS3	Responsible: Resource: Staff, Time and Budget	Continuous	Environmental emergency response plan Environmental incidents records Response equipment inventory	FC
3.8	Resource Consumption	Measures to reduce consumption of water, energy and other resources	Support of clean and efficient production	IFC PS3 Local Legislation	Responsible: Resource: Staff, Time and Budget	Continuous	Studies regarding energy efficiency Measures to reduce water consumption	FC

**PS4
Community Health, Safety and Security**

4.1	Community Health and Safety	Preparation and implementation of emergency response plans Preparation and implementation of security plan	Good relationship with stakeholders Compliance with best practices	IFC PS 1, PS4	Responsible: Resource: Staff, Time and Budget	Continuous	Emergency response plan	FC
4.2	Life and Fire Safety	Fire and life safety related documentation shall be prepared to reduce fire impact	Maintenance Life and fire safety	IFC PS4/PS2 NFPA Standards	Responsible:	Continuous March 2021	Fire scenarios Design certificates	PC

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		with the criteria to be followed and implementation of the impact reduction measures	Protection of property		Resource: Staff, Time and Investment		Maintenance records	

4.3	Security	Security Plan development and implementation Enough trained staff with trainings and clean legal records	Secure working environment Minimal impact on stakeholders	IFC PS4 Best Practice Local Legislation	Responsible: Resource: Staff, Time	Continuous	Security Plan Audit and assessment records Records of trainings Training records of security staff	FC
PS5								
Land Acquisition and Involuntary Resettlement								
5.1	Land Acquisition and Involuntary Resettlement is not involved in the project. Hence this PS is not applicable.							NA
PS6								
Biodiversity Conservation and Sustainable Management of Living Natural Resources								
6.1	Since the project is within an existing building and plant within and highly industrialized and densely occupied by residential areas this PS cannot be applied.							NA
PS7								
Indigenous People								
7.1	There are no indigenous people in the region. Hence, this PS is not applicable.							NA
PS8								
Cultural Heritage								
8.1	Investment is going to be made in an existing building. There is no record of cultural heritage in the area. Hence this PS is not applicable.							NA

