



# APPENDIX N

## ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP) FOR KOCAELI PROJECT

FINAL VERSION AGREED WITH EBRD / OPIC / EDC  
ON 02.06.2016

REPORT



Submitted to:

Report Number





## **Table of Contents**

<b>KOCAELI INTEGRATED HEALTH CAMPUS PROJECT – ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP).....</b>	<b>2</b>
Pre-construction Phase.....	2
Construction Phase.....	7
Operational Phase .....	8



## APPENDIX N

# KOCAELI INTEGRATED HEALTH CAMPUS PROJECT – ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP)

## Pre-construction Phase

Number	Subject	Legal Framework (National, Lenders Requirement, Best Practice)	Action	Deadline	Completion Indicator	Responsibility
1	Contractor Compliance	EBRD PR1 & PR2 IFC PS1 & PS2	Include clauses in contracts requiring compliance with Project HR Policy, ESMP, ESAP, EHS and other Plans linked to ESMP	Prior to financial close	Review of the updated contract requirements by the LTA to ensure that it contains appropriate clauses that require the contractors and sub-contractors to comply with the EHS requirements to manage the environmental and social risk and adhere to mitigation measures and actions identified and set out in the ESMP and ESIA.	SPV
2	Environmental and Social Management System (ESMS) for SPV	IFC PS1/PS2 EBRD PR1/PR2 IFC General EHS Guidelines	Define and implement an ESMS within the framework described in the ESA for the Project  Establish and maintain an organizational structure with personnel having knowledge, skills, and experience necessary to manage the ESMS and Project ESHS (Environmental Social Health and Safety) issues.	30 days prior to construction phase	ESMS  Established and defined organisational structure and roles & responsibilities Appointed Environmental and Social Manager/Team  Established management plans and procedures	SPV



## APPENDIX N

Number	Subject	Legal Framework (National, Lenders Requirement, Best Practice)	Action	Deadline	Completion Indicator	Responsibility
			<p>Appoint a qualified Environmental and Social Manager/Team</p> <p>Train the designated personnel for environmental and social issues and implementation of below mentioned plans.</p>		<p>Audit, measurement and training records</p> <p>Proof documentation for permits and licenses</p>	
3	Permitting	National legislation	<p>Determine legal permits/consents/approvals needed to be obtained before starting construction and prepare a "Legal and Other Requirements Follow-up List" covering permits/consents/approvals</p> <p>Obtain all necessary permits/consents/approvals (including construction permit)</p>	30 days prior to construction phase	<p>A comprehensive Legal and Other Requirements Follow-up List</p> <p>Records of permits, official letters, licenses, approvals, documents etc.</p>	SPV/EPC Contractor
4	Operational solid waste and waste water	IFC PS3, EBRD PR3, National legislation and best practice	<p>Obtain a confirmation letter from the Municipality regarding appropriate capacity of existing Waste Water Treatment System to accept discharge of waste waters at operational stage.</p> <p>Obtain a confirmation letter from the Municipality regarding appropriate</p>	Prior to disbursement	<p>Correspondence with the authorities</p> <p>Permit for disposal of medical waste</p> <p>Proof documentation for permits and licenses</p>	SPV



## APPENDIX N

Number	Subject	Legal Framework (National, Lenders Requirement, Best Practice)	Action	Deadline	Completion Indicator	Responsibility
			capacity of existing municipal waste disposal sites and from the medical waste sterilisation facilities in the area to accept municipal and medical waste at project operational stage.			
5	Environmental and Social Management System (ESMS) for EPC and their subcontractors	IFC PS1/PS2 EBRD PR1/PR2 IFC General EHS Guidelines,	<p>EPC to develop an ESMS in line with international good practice and guidelines (i.e. ISO 14001: 2004, OHSAS 18001: 2007)</p> <p>Establish an organizational structure for the implementation of the ESMS</p> <p>Appoint a qualified Environmental and Social Manager/Team</p> <p>EPC to develop and implement detailed final versions of management plans based on the draft versions initiated by the sponsors,</p> <p>including the following:</p> <ol style="list-style-type: none"> <li>1. Stakeholder Engagement Plan (including grievance mechanism for the general public/stakeholders)</li> <li>2. Employee Grievance mechanism</li> </ol>	30 days prior to construction phase	<p>ESMS developed and implemented, Appointed Environmental and Social Manager/Team</p> <p>Established management plans and procedures</p> <p>Audit, measurement and training records</p>	EPC



## APPENDIX N

Number	Subject	Legal Framework (National, Lenders Requirement, Best Practice)	Action	Deadline	Completion Indicator	Responsibility
			<ul style="list-style-type: none"><li>3. Contractors Management Plan</li><li>4. Hazardous Material Management Plan</li><li>5. Waste Management Plan</li><li>6. Air Quality, Noise and Vibration Management Plan</li><li>7. Traffic Management Plan</li><li>8. Archaeological Chance Find Procedure</li><li>9. Construction Camp Management Plan (including workers accommodation)</li><li>10. Construction ESHS Management Plan (including community health and safety issues)</li><li>11. Human Resources Management Plan (including worker code of conduct)</li><li>12. Emergency Preparedness and Response Plan</li><li>13. Spill Response Plan</li></ul>			



## APPENDIX N

Number	Subject	Legal Framework (National, Lenders Requirement, Best Practice)	Action	Deadline	Completion Indicator	Responsibility
			14. Security Plan 15. Occupational Health and Safety Plan 16. Archaeological Chance Find Procedure 17. Employment and Procurement Plan 18. Policy on Prohibition of Child Labour and Forced Labor 19. Resource Policy and Management Plan 20. ESMS Manual 21. ESMS Policy 22. Wastewater Management Plan			
6	Concrete Batching Plant	IFC PS3, EBRD PR3, National legislation and best practice	If a second concrete batching plant is required, or a batching plant exceeding 100m <sup>3</sup> /hr, undertake national environmental regulatory process: PDF	30 days prior to construction	PDF for Project's concrete batching plant exceeding 100m <sup>3</sup> /hr	SPV
7	Fire and life safety		Design the Project in accordance with the Regulation on the Protection of Buildings from Fire (issued on: 19.12.2007, Official Gazette ("OG") No: 26735) and other relevant regulations	Prior to Construction	Third party audit for life and fire safety plan	EPC



## APPENDIX N

Number	Subject	Legal Framework (National, Lenders Requirement, Best Practice)	Action	Deadline	Completion Indicator	Responsibility
			for fire and life safety. Conduct a third party audit for life and fire safety plan			

### Construction Phase

Number	Subject	Legal Framework (National, Lenders Requirement, Best Practice)	Action	Deadline	Completion Indicator	Responsibility
1	Environmental and Social Management System (ESMS ) for EPC and Subcontractors	IFC PS1/PS2 EBRD PR1/PR2 IFC General EHS Guidelines	EPC to implement the ESMS in line with international good practice and guidelines (i.e. ISO 14001: 2004, OHSAS 18001: 2007)  Train the designated personnel for environmental and social issues and implementation of detailed plans. Carry out internal audits and inspections for compliance with ESMS.	Throughout the Construction	Audit, measurement and training records	EPC
2	Life and fire safety	IFC EHS Guidelines 3.3	Conduct an independent life and fire safety inspection	Prior to operations phase	Independent audit report	SPV





## APPENDIX N

Number	Subject	Legal Framework (National, Lenders Requirement, Best Practice)	Action	Deadline	Completion Indicator	Responsibility
3	Construction audit	IFC PS2, EBRD PR	Conduct independent audit for assessment of compliance of the construction site with IFC and EBRD relevant performance standards and requirements and the ESAP	Semi-annual	Independent audit report	SPV
4	Solid waste and waste water at construction stage	IFC PS3, EBRD PR3, National legislation and best practice	<p>Obtain a confirmation letter from the Municipality in regards to disposal of solid waste, waste water from construction stage and confirmation in regards to existing capacity of the relevant municipality services.</p> <p>Obtain necessary permit related with the disposal of excavated soil</p>	30 days Prior to Operations	<p>Correspondence with the authorities</p> <p>Proof documentation for permits and licenses</p> <p>Permit for disposal of excavated soil</p>	

### Operational Phase

Number	Subject	Legal Framework (National, Lenders Requirement, Best Practice)	Action	Timetable	Completion Indicator	Responsibility
1	Commissioning	IFC PS1	All relevant commissioning tests have been carried out successfully.	30 days prior to operations	Obtain all necessary approvals for the commencement of the	SPV



## APPENDIX N

Number	Subject	Legal Framework (National, Lenders Requirement, Best Practice)	Action	Timetable	Completion Indicator	Responsibility
					Hospital.	
2	GHS emissions	IFC PS3	Report on greenhouse gas emissions during the operation of the project	Within a year of operations and reported annually		O&M contractor
3	Operational Contractor Compliance	EBRD PR1 & PR2 IFC PS1 & PS2	Include clauses in contracts with operational contractors requiring compliance with Project HR Policy, ESMP, ESAP, EHS and other Plans linked to ESMP	30 days prior to operational phase	Review of the updated contract with operational contractors requirements by the LTA to ensure that it contains appropriate clauses that require the contractors and sub-contractors to comply with the EHS requirements to manage the environmental and social risk and adhere to mitigation measures and actions identified and set out in the ESMP and ESIA.	SPV
4	Medical facility accreditation	OPIC IFH EHS Guidelines for Health Care Facilities	Coordinate with the MoH. Achieve/maintain Joint Commission International (JCA) accreditation for the life of the loan	As soon as possible but no later than 18 months following commencement of hospital operations	JCI accreditation	SPV
5	Provide operational Environmental and Social Management System	IFC PS1/PS3/, EBRD PR1/PR3, Best practice	Update the mitigation measures in accordance with the EBRD Environmental and Social Standards and IFC EHS Guidelines in relation to wastewater, waste, air, noise and vibration, medical and radioactive	30 days prior to operational phase	ESMPs updated for operational stage  Appointed Environmental and Social	SPV



## APPENDIX N

Number	Subject	Legal Framework (National, Lenders Requirement, Best Practice)	Action	Timetable	Completion Indicator	Responsibility
			<p>waste, and hazardous waste.</p> <p>Establish and maintain an organizational structure with personnel having knowledge, skills, and experience necessary to manage the ESMS and Project ESHS issues.</p> <p>Train the designated personnel for environmental and social issues and implementation of below mentioned plans.</p> <p>Update ESMPs to reflect operational phase of the Project, including:</p> <ol style="list-style-type: none"><li>1. Stakeholder Engagement Plan (including grievance mechanism for the general public/stakeholder)</li><li>2. Employee Grievance mechanism</li><li>3. Contractors Management Plan</li><li>4. Hazardous Material Management Plan</li><li>5. Waste Management Plan,</li><li>6. HWMS in line with the waste management practices given in the IFC Guidelines for Health</li></ol>		<p>Manager/Team</p> <p>Audit, measurement and training records</p>	



## APPENDIX N

Number	Subject	Legal Framework (National, Lenders Requirement, Best Practice	Action	Timetable	Completion Indicator	Responsibility
			<p>Care Facilities</p> <ol style="list-style-type: none"><li>7. Air Quality, Noise and Vibration Management Plan</li><li>8. Traffic Management Plan</li><li>9. Archaeological Chance Find Procedure</li><li>10. Human Resources Management Plan (including worker code of conduct)</li><li>11. Emergency Preparedness and Response Plan</li><li>12. Spill Response Plan</li><li>13. Security Plan</li><li>14. Occupational Health and Safety Plan</li><li>15. Subcontractor Management and Monitoring Plan</li><li>16. Sustainable procurement policy</li><li>17. Community Health and Safety</li></ol>			



## APPENDIX N

Number	Subject	Legal Framework (National, Lenders Requirement, Best Practice)	Action	Timetable	Completion Indicator	Responsibility
			Management Plan  Carry out relevant monitoring under ESMS			
6	Radioactive materials	IFC PS1/PS3, EBRD PR1/PR3, Best practice	Develop a Radioactive Management Plan	30 days Prior to operation	Radioactive Management Plan	SPV
7	Infection	IFC PS4, EBRD PS4	Develop and implement an Infection Control Plan for hospital	30 days prior to operational phase	Infectious Disease Control Plan	SPV
8	Human Resources	IFC PS2, EBRD PS2	Develop and implement HR Policy and Management Plan in line with IFC PS2/EBRD PR2 and ensure all workers are aware of its content.	30 days prior to commencement of operations.	<ol style="list-style-type: none"> <li>1. HR Policy</li> <li>2. HR Management Plan</li> <li>3. Employee/Worker contracts</li> <li>4. Procedure for HR coordination among service providers</li> </ol>	O&M Contractor
9	Contractor monitoring and management	IFC PS2, EBRD PS2	Develop appropriate internal labor monitoring and compliance policy and procedures that specifically address due diligence and monitoring, to include: <ul style="list-style-type: none"> <li>• Identification and description of individuals responsible</li> </ul>	30 days prior to commencement of operations.	Subcontractor Management and Monitoring Plan	O&M Contractor



## APPENDIX N

Number	Subject	Legal Framework (National, Lenders Requirement, Best Practice)	Action	Timetable	Completion Indicator	Responsibility
			<ul style="list-style-type: none"> <li>• Frequency of Monitoring</li> <li>• Monitoring checklist/questionnaire that incorporates labor laws, regulations and requirements (including OPIC's Worker Rights Requirements)</li> <li>• List of labor policies and procedures that will be reviewed</li> <li>• Program to interview direct, contracted and sub-contracted employees</li> <li>• Guidelines for identifying non-compliance indicators "on the ground"</li> <li>• Template for regular monitoring reports that will be submitted to management</li> <li>• Template for corrective/remediation action plan for cases of non-compliance.</li> </ul>			
10	Security	IFC PS4, EBRD PS4, the International	Develop and implement Security Management Plan and Assessment of Project security risks for the operational phase to include:	90 days prior to commencement of operations.	Security Risk Assessment Security Management Plan	O&M Contractor



## APPENDIX N

Number	Subject	Legal Framework (National, Lenders Requirement, Best Practice)	Action	Timetable	Completion Indicator	Responsibility
		Code of Conduct for Private Security Providers, ANSI/ASIS PSC 1, and the Voluntary Principles on Security and Human Rights.	<ul style="list-style-type: none"><li>• Coordination with MoH to ensure that security personnel will act in a manner consistent with the applicable legal framework.</li><li>• Procedures to screen and hire trained security staff not implicated in past abuses.</li></ul>			

As a global, employee-owned organisation with over 50 years of experience, Golder Associates is driven by our purpose to engineer earth's development while preserving earth's integrity. We deliver solutions that help our clients achieve their sustainable development goals by providing a wide range of independent consulting, design and construction services in our specialist areas of earth, environment and energy.

For more information, visit [golder.com](http://golder.com)

Africa	+ 27 11 254 4800
Asia	+ 86 21 6258 5522
Australasia	+ 61 3 8862 3500
Europe	+ 356 21 42 30 20
North America	+ 1 800 275 3281
South America	+ 56 2 2616 2000

[solutions@golder.com](mailto:solutions@golder.com)  
[www.golder.com](http://www.golder.com)

**Golder Associates (Turkey) Ltd. ŞTI**  
**Hollanda Cad. 691. Sok. Vadi Sitesi No:4**  
**Yıldız 06550 Ankara**  
**Turkey**  
**T: +90 312 4410031**

