

**TÜRKİYE PUBLIC AND MUNICIPAL RENEWABLE ENERGY PROJECT
(PUMREP)**

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

**2,53 MW_m / 2,20 MW_e Solar (Photovoltaic) Power Plant Project
of Kayseri Water and Sewerage Directorate (KASKİ)**

AUGUST 2025

Document History

Revision	Submitted to	Issue Date	Revision Details
V1	ILBANK	05 August 2025	Draft

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Abbreviations

AF	Associated Facility
CCTV	Closed-Circuit Television
DG	Directorate General
E&S	Environmental and Social
EHS	Environmental, Health and Safety
EHSG	Environmental, Health and Safety Guidelines
EIA	Environmental Impact Assessment
ESA	Environmental and Social Assessment
ESAP	Environmental and Social Action Plan
ESF	Environmental and Social Framework
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standards
ETL	Energy Transmission Line
E&S	Environmental and Social
FI	Financial Intermediary
GFI	Ground Fault Interrupter
GIIP	Good International Industry Practice
GM	Grievance Mechanism
IFIs	International Financial Institutions
IA	Impact Area
KASKI	Kayseri Water and Sewerage Directorate
ILBANK	İller Bankası A.Ş.
KPI	Key Performance Indicator
MTA	Directorate of Mineral Research and Exploration
OHS	Occupational Health and Safety
O&M	Operation and Maintenance
PAP	Project Affected People
PDR	Project Description Report
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
Project	Public and Municipal Renewable Energy Project
PUMREP	Public and Municipal Renewable Energy Project
RD	Regional Directorate
RE	Renewable Energy
SCADA	Supervisory Control and Data Acquisition
SEA/SH	Sexual Exploitation and Abuse and Sexual Harassment
SEP	Stakeholder Engagement Plan
SPP	Solar Power Plant
Sub-project	AĞIRNAS SPP Project of Sub-borrower KASKI
WB	World Bank

Glossary of Terms

Associated facilities	Facilities or activities that are not funded as part of the Sub-project and are: (a) directly and significantly related to the project; (b) carried out, or planned to be carried out, contemporaneously with the project; and (c) necessary for the project to be viable and would not have been constructed, expanded or conducted if the project did not exist. For facilities or activities to be Associated Facilities, they must meet all three criteria.
Contractor	A person or organization providing services to an employer at the client worksite in accordance with agreed specifications, terms and conditions.
Excavated material	Materials/soils that are generated as a result of excavation and other similar activities carried out prior to construction
Legally protected area	Designated terrestrial, aquatic or marine ecosystems managed under the related legislation to protect and sustain the biodiversity features, natural and associated cultural resources. Legally protected areas of Türkiye include a diversity of natural ecosystems and associated features ranging from coastal zones to mountains, deltas, forests, plains, steppe, lakes, river systems, deep valleys, canyons, and glaciers.
Material borrow site	Sites, where loose material containing gravel, sand, silt, and clay, which is formed by the natural and geological processes of rock fracturing, fragmentation, alteration, transportation, and/or in-situ sedimentation, and which has the characteristics of slope debris, are extracted to be used as fill material.
Off-site accommodation	Accommodation of workers at hotels, rented housing, etc. available in the vicinity of Sub-project area.
On-site accommodation	Accommodation of workers at temporary exploration camps, construction camps, dormitories, etc. established for the Sub-project on site.
Risk	A combination of the likelihood of an occurrence of a hazardous event and the severity of injury or damage to the health of people caused by this event.
Topsoil	Part of soil that provides organic and inorganic materials, air and water required for vegetative growth, and is required to be stored separate from the subsoil.

EXECUTIVE SUMMARY

Türkiye Public and Municipal Renewable Energy Subproject (PUMREP) is financed by the World Bank (WB) to support the deployment of Renewable Energy (RE) technologies in municipalities and to scale up renewable energy in the public sector. İller Bankası A.Ş. (ILBANK) and the WB have established a support system for developing cities to identify, prepare, finance and finance investments for metropolitan municipalities to plan for and invest in a sustainable future, and to develop their urban planning capacities for this purpose. One of the areas of support is in the areas of institutional capacity building and Energy Efficiency and Renewable Energy.

Within the scope of PUMREP, Kayseri Metropolitan Municipality General Directorate of Water and Sewerage Administration (KASKİ) plans to install a land-applied Solar Power Plant (SPP) subproject called KASKİ AĞIRNAS SPP for a connection power of 2.200 kWe on the parcels of land specified in Table 1.

Table 1. Location and Connection Power Information of the Planned Plant

No	Power Plant Name	Connection Power	District/Neighborhood	Block/Parcel	Area(m ²)
1	KASKİ-AĞIRNAS	2.200 kWe	Melikgazi District /Ağırnas Neighborhood	402/9	40.408,26

The Sub-project has been classified as having a Moderate level of risk according to ILBANK's E&S Risk Screening under its ESMS. As part of the Sub-project, an Environmental and Social Management Plan (ESMP) has been prepared in line with ILBANK's ESMS, the WB Environmental and Social Framework (ESF), relevant Environmental and Social Standards (ESSs), WBG General EHS Guidelines, Industry Sector Guidelines, and Türkiye's national legislation. This ESMP aims to enhance sub-borrowers' capacity and awareness while ensuring compliance with these standards and regulations, as is required for internationally financed subprojects.

Within the scope of national legislation, the subproject has an "EIA Not Required" decision (Annex-B EIA Not Required Certificate) within the scope of the national EIA Regulation (Official Gazette dated 29.07.2022 and numbered 31907) in January 2024. In addition, a non-agricultural use permit has been obtained for the area where the subproject is planned to be constructed (Annex-B Non-Agricultural Use Permit).

"The "KASKİ Ağırnas SPP" subproject plans to realize a 2.20 MWe Solar Power Plant Subproject on block 402 parcel 9, Ağırnas Neighborhood, Melikgazi District, Kayseri Province, owned by Kayseri Water and Sewerage Administration (KASKİ). The sub-project will be located on land currently owned by KASKİ where the drinking water pumping station is located.

Sub-project has an area of 40,408.26 m² with the 402 block and parcel number 9. Only 30,000 m² of this parcel number 9 area will be used. The land is owned by KASKİ, and no land acquisition or expropriation will be carried out during the construction and operation phases of the sub-project. The title deed for the sub-project area is provided in Appendix C. The sub-project area is shown in Figure 1.



Figure 1. Subproject Area

The environmental and social risk rating of the subproject is assessed as “**Moderate**” as the environmental and social risks for the construction works are temporary and site specific and the subproject construction area is not located in environmentally and socially sensitive area. Therefore, environmental, and social risks can be mitigated by applying good construction practice guidelines and mitigation measures identified in this ESMP. This ESMP has been prepared for this subproject in line with the overarching ILBANK ESMS and WB ESF, covering risks and mitigation measures specific to this subproject area.

The sub-project area is located in the Ağırnas neighborhood. Since the sub-project area is located far from the Ağırnas neighborhood settlement center and in an area where urbanization is not dense, it eliminates many environmental and social risks. The closest settlement to the sub-project area is a livestock farm 50 m away. The sub-project area is located 24 km from the city center of Kayseri and 1,500 m from the Ağırnas neighborhood. The nearest residential areas to the sub-project area are the Çavuşağa neighborhood, 5,500 m away, and the Güneşli neighborhood, 6,500 m away. Access to the sub-project area is provided via Osman Yücel Street and the connecting road 3091. The roads to be used for logistics and material supply during the mobilization, construction, and operation phases do not pass through the Ağırnas neighborhood center, so they will not affect the residential areas and social facilities in the neighborhood center. Only the roads where a few houses are located at the intersection of Osman Yücel Street and the connecting road 3091 will be used. The sub-project area consists of a rocky terrain with soil, and there are no trees on it. Therefore, before the construction phase, topsoil removal work will be completed on the soil areas, and the subsoil and topsoil will be stored separately without being mixed.

As a result of the site visit, seven livestock farms were found to be located near the sub-project area. Of these, the two closest livestock farms were found to be 50 m and 200 m away, respectively. The other livestock farms are located at distances of 300 m, 400 m, 500 m, 650 m, and 700 m, respectively. In the Project Presentation File prepared for the subproject and during the EIA process, it was determined that there is no special plant community in the subproject area, and it was stated that there is no objection to the removal of the existing plant species in the area.

During the field visit, although it was not possible to meet face-to-face with the owner of the livestock farm located 50 m from the sub-project area, a telephone conversation was held. However, during the face-to-face consultation with the owner of the livestock farm located 200 m away, it was determined that his livelihood was based on livestock farming. He was asked for his opinion on whether the implementation of the Ağırnas GES sub-project would negatively affect him and his livelihood, which is livestock farming. During this consultation meeting, the individual who owns a livestock farm on parcel number 407/1 and whose main source of livelihood is livestock farming stated that he engages in livestock farming and that these animals are not taken outside the livestock farm for grazing purposes, and that there will be no negative impact on his livelihood. Following a telephone conversation, the owner of another livestock farm also stated that the construction of the GES would not have a negative impact on their livelihood. Therefore, it is understood that the construction of the GES in the sub-project area will not have a negative impact on livelihoods. Before the mobilization and construction phase of the sub-project begins, the consultant company's social expert will organize a consultation meeting with local residents engaged in livestock farming to identify their concerns and needs regarding the sub-project. In addition, during the construction phase of the sub-project, unauthorized access to work areas may pose a risk due to labor and occupational safety issues, and the entire sub-project area will be fenced off with wire fencing to prevent unauthorized entry.

The main risks encountered during the mobilization and construction phases of the sub-project are dust generated by earthworks, noise pollution, and traffic congestion and accident risks on the Bünyan ring road, Osman Yücel Street, and 3091st Street, which will be used for transportation.

1. INTRODUCTION

1.1. Background

The Public and Municipal Renewable Energy Project (PUMREP) (hereinafter referred to as the “Project”) aims to increase the use of renewable energy through self-generation in public facilities. The Project will contribute to expanding the market for distributed RE in public facilities, helping to demonstrate leadership in the public sector to use sustainable energy solutions to fulfill the country's climate mitigation commitment and increase energy security.

PUMREP is financed by the World Bank (WB) to support the deployment of RE technologies in municipalities. İller Bankası A.Ş. International Relations Department (ILBANK) acts as the Financial Intermediary (FI). The project will be implemented through 4 components:

Component 1: Renewable energy investments in central government facilities

Component 2: Renewable energy investments in municipalities

Component 3: Technical assistance and project implementation support

Component 4: Emergency Response Component (CERC).

Kayseri General Directorate of Water and Sewerage Administration (KASKİ) (hereinafter referred to as the “Sub-Borrower”) applied to ILBANK for the sub-financing of KASKİ AĞIRNAS SPP 2.20 MWe (hereinafter referred to as the “Sub-Project”) under Component 2. The Sub-Project is located on block 402 block and parcel 9 of Ağırnas Neighborhood in Melikgazi District of Kayseri Province.

ILBANK has established an Environmental and Social Management System (ESMS) effective on 24th of Dec 2023. The ESMS is aligned with the requirements of World Bank (WB) Environmental and Social Framework (ESF, 2018) including Environmental and Social Standards (ESSs) forming part of the ESF, and E&S policies and standards of other International Financial Institutions (IFIs) ILBANK collaborates with. It will be applicable to all ILBANK projects and Sub-project financed through International Financial Institutions (IFIs).

The ESMS aims to ensure systematic identification, assessment, management, monitoring, and reporting of the environmental and social (E&S) risks and impacts of the projects and Sub-project financed by the International Finance Institutions (IFIs). This process will be implemented on an ongoing basis throughout their loan duration in line with the requirements of the national legislation, international agreements and conventions ratified by Türkiye and E&S standards of lending IFIs (World Bank for the PUMREP). As a critical element of the ESMS, ILBANK has adopted and published an E&S Policy¹ applicable to all ILBANK projects and Sub-project financed through IFIs.

Within the scope of the ILBANK’s ESMS and World Bank Environmental and Social Framework (ESF), Sub-project are classified as High Risk, Substantial Risk, Moderate Risk or Low Risk taking into account relevant potential risks and impacts, such as the type, location, sensitivity and scale of the Sub-project; the

¹ <https://www.ilbank.gov.tr/sayfa/ilbank-environmental-and-social-policy>
<https://www.ilbank.gov.tr/sayfa/ilbank-cevresel-ve-sosyal-politika-dokumani>

nature and magnitude of the potential E&S risks and impacts; the capacity and commitment of the Sub-borrower; and other relevant areas of risks that may result in unintended impacts.

ILBANK considers financing the Sub-project under the PUMREP. In line with the ESMS, ILBANK carried out an E&S screening and risk classification of the Sub-project and rated the activity as having “Moderate” E&S risk. The Sub-borrower has retained a third-party consultancy company for the preparation of the E&S instruments required as per the E&S risk category assigned to the Sub-project.

This Environmental and Social Management Plan (ESMP) has been prepared by Kolay Enerji Engineering & Consultancy for the Sub-project in line with the applicable E&S requirements as set out in Section **Hata! Başvuru kaynağı bulunamadı.**

A stand-alone Stakeholder Engagement Plan (SEP) has also been developed for the Sub-project.

1.2.Objective of the ESMP

This ESMP has been prepared to detail the measures to be taken during the implementation and operation (throughout the sub-financing agreement life cycle) of the Sub-project to eliminate or offset adverse E&S impacts, or to reduce them to acceptable levels; and the actions needed to implement these measures.

1.3.Overview of E&S Requirements Applicable to the Sub-Project

The Sub-project will be implemented in compliance with the requirements of the applicable national legislation and international agreements and conventions to which Türkiye is a party of, and in accordance with the following international requirements:

- ILBANK Environmental and Social Management System (ESMS)
- WB Environmental and Social Framework (ESF, 2018) and the Environmental and Social Standards (ESSs) forming part of the ESF,
- WB Group General Environmental, Health and Safety Guidelines (EHSGs) (2007)
- GIIP
- WB Group EHSGs for Electric Power Transmission and Distribution (2007)

Table 2 identifies the relevance of the WB ESSs to the Sub-project.

Table 2 . Relevance of the WB ESSs to the Sub-project

ESSs	Definition	Relevance to the Sub-project
ESS 1	Assessment and Management of E&S Risks and Impacts	Relevant
ESS 2	Labor and Working Conditions	Relevant
ESS 3	Resource Efficiency and Pollution Prevention and Management	Relevant
ESS 4	Community Health and Safety	Relevant
ESS 5	Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Relevant
ESS 6	Biodiversity Conservation and Sustainable Management of Living Natural Resources	Relevant
ESS 7	Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	Not relevant in Türkiye
ESS 8	Cultural Heritage	Relevant
ESS 9	Financial Intermediaries	Not relevant to Sub-project
ESS 10	Stakeholder Engagement and Information Disclosure	Relevant

When national requirements differ from the levels and measures presented in the EHSGs, the Sub-project will achieve or implement whichever is more stringent.

1.4. Review and Update

This ESMP will be reviewed and updated by the Sub-borrower during Sub-project implementation as necessary, to reflect changes in national legislative framework, ILBANK's policies and other developments or in specific circumstances such as in case there are changes in the organization structure, following significant incidents, following incorporation of new tools, software or database into the ILBANK E&S Risk Management System, etc.

The Sub-borrower will notify ILBANK of any updates to the ESMP.

The Sub-borrower will ensure that changes to the ESMP do not result in deviation from the requirements set forth by the national legislation and the E&S requirements applicable to the Sub-project.

1.5. Implementation Arrangement

The Sub-borrower will hold ultimate responsibility for implementation of this ESMP by the Sub-borrower and contractor teams (engaged in connection with the Sub-project – including sub-contractors) throughout the sub-financing agreement life cycle.

The Sub-borrower will ensure that adequate financial and human resources for effective ESMP implementation are available at Sub-borrower, supervision consultant and contractor organizations throughout the sub-financing agreement life cycle.

The Sub-borrower will decide on the arrangements for the operation of the Sub-project and be responsible for ensuring that operations are compliant with the national legislation and Operation ESMP.

The Sub-Borrower must ensure that all failures that may occur during the 1-year operational phase (during the defect liability period) are covered by the contractor and subcontractor organizations.

The roles and responsibilities of the Sub-borrower, contractor, and sub-contractor teams regarding the ESMP implementation are described in Chapter **Hata! Başvuru kaynağı bulunamadı..**

2. SUB-PROJECT DESCRIPTION

2.1.Sub-project Information

The sub-project activity subject is related to the establishment and operation of a photovoltaic (PV) solar power plant (SPP).

Key technical information on the Sub-project is summarized in **Table 3** Further information on the construction and operation phase activities and facilities is provided in the following sections in this Chapter.

Table 3 . Key Technical Information on Sub-Project

Information	Remarks/ Notes
Technology	Photovoltaic
Installed Power	2.53 MWp
Connection Power	2.20 MWe
Annual Electricity Generation	3.435 MWh
Solar Panel Type	Monocrystalline
Annual Carbon Emission Reduction	1.374 Tons CO ₂ /Year
Lifetime Carbon Emission Reduction	34.350 Tons / for 25 Years
Households Powered	1145 / 3 MWh per house annually
Economic Life of the Power Plant (Operation Duration)	Min 25 Years

2.1.1. Sub-project Location

The sub-project is located in Kayseri Province, Melikgazi District, Ağırnas Neighborhood, 402 Block, Parcel No. 9. The land belongs to KASKİ, and no land acquisition or expropriation will be required during the construction and operation phases of the sub-project. The title deed for the sub-project area is provided in Appendix C. Since the energy transmission line will also pass underground and through the same land, no land acquisition will be required for the ETL either.

Information on the Sub-project location is presented in Table 4.

Table 4 . Su-project Location

Information	Remarks/ Notes
Province	Kayseri
District	Melikgazi
Neighborhood/ Village	Ağırnas
Land Area (ha)	402/9- 40,408.26 ha parcel area- 30,000 m ² Sub-project area
Land Use Type according to Title Deed	Water Tank and Land
Current Land Use	Rocky terrain covered with soil. A small portion of the sub-project area is officially used as a water reservoir. There are no unofficial activities.
Other Nearby Facilities and Activities	Livestock Farm (50 m) Livestock Farm (200 m) Livestock Farm (300 m)

	Livestock Farm (400 m) Livestock Farm (500 m) Livestock Farm (650 m) Livestock Farm (700 m) Ağırnas Neighborhood Center (1500 m) Çavuşağa Neighborhood Center (5500 m) Güneşli Neighborhood Center (6500 m)
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A map of the Sub-project location is presented in **Figure 2**.

Figure 2 . Map of Sub-project Location



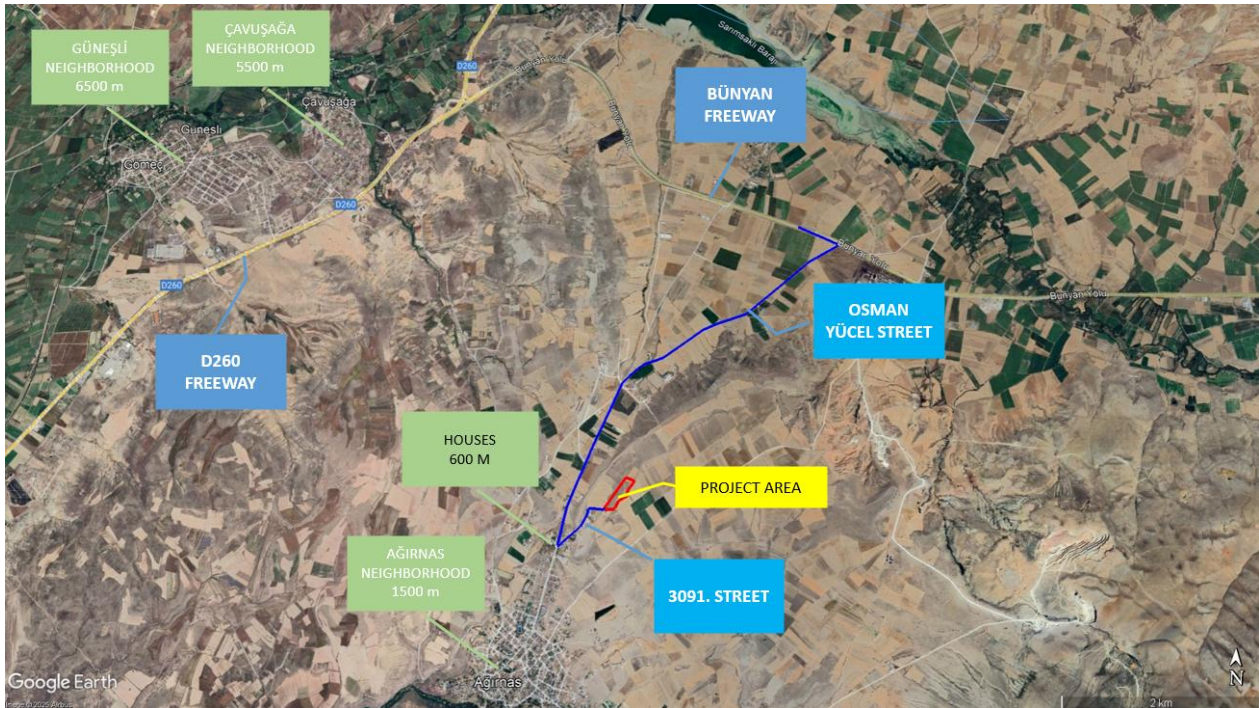
Table 5. Coordinates of the Sub-project Area

Unit	Coordinates (WGS84 in decimals)	
	Y	X
Sub-project Area	38.834735	35.731360

2.1.2. Site Access Route

The sub-project area is bordered by the Bünyan ring road, which branches off from the D260 ring road to the west and extends northward, Osman Yücel Street, which extends from north to west, and 3091st Street to the south. The sub-project area is accessed via 3091st Street, which branches off from Osman Yücel Street. The roads to be used for logistics and material supply during the mobilization, construction, and operation phases will not pass through the center of Ağırnas neighborhood. However, there are 9 houses at the intersection of Osman Yücel Street and the secondary road leading to the sub-project area at the entrance of the neighborhood (see Figure 3). These houses may be affected by the traffic load of the sub-project. Furthermore, the aforementioned secondary road is unpaved and narrow, and will be improved by Kayseri KASKİ prior to the commencement of sub-project activities.

Figure 3. Subproject Access Road and Ağırnas Neighborhood Location



2.1.3. Energy Transmission Line (ETL)

The sub-project involves the construction of a 350-meter underground energy transmission line (ETL). Technical information about the ETL is presented in Table 6. A map showing the ETL route and national grid connection point is provided in Figure 4.

The electricity generated by the newly established AĞIRNAS GES sub-project will be connected to the national electricity grid via a 350-meter underground power transmission line within the GES site and the existing DNP1Y01 K2 in the same area, in accordance with the relevant regulations.

The pole to which the power transmission line will be connected is located within the parcel adjacent to the sub-project area. Kayseri KASKİ has written an official letter to KCETAŞ, the electricity distribution company, requesting that the pole be moved within the sub-project area. KCETAŞ has officially stated in writing that the number of pole HC0099 will not be changed after the pole relocation process.

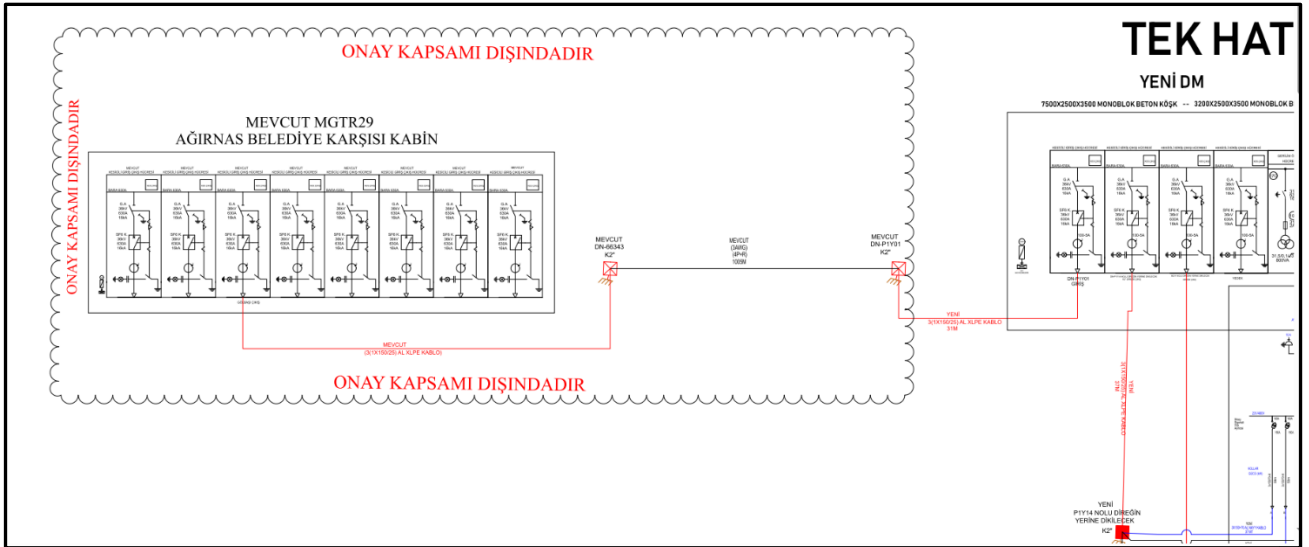
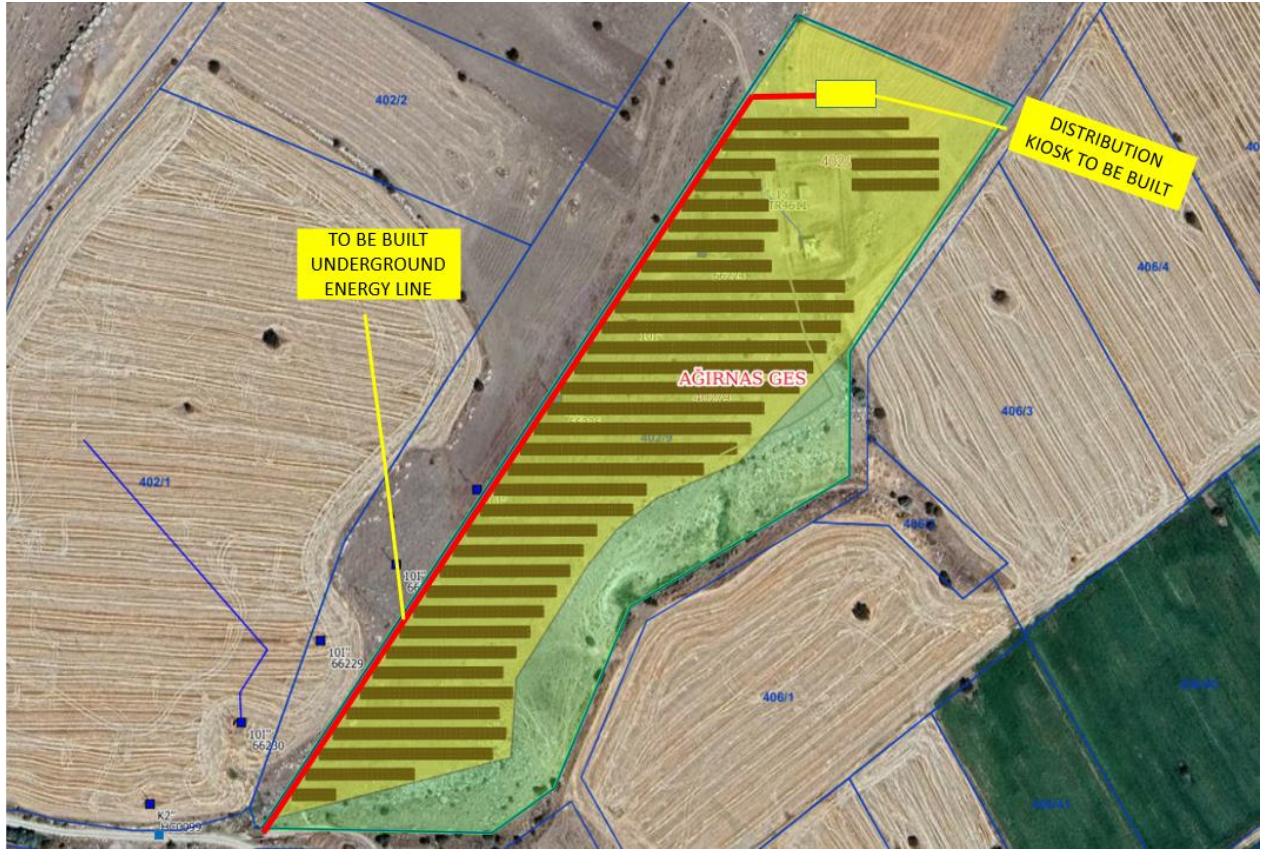
No additional overhead power transmission line will be constructed as part of the sub-project. The underground power transmission line (ETL) will pass through parcel number 402/9 and will not extend beyond the sub-project area. Therefore, no expropriation or land acquisition will be required (Figure 4).

Status of land acquisition for the ETL is described below in Section 3.4.

Table 6 . Technical Information on the ETL

Information	Remarks/ Notes
Transformer station (for national grid connection)	DNP1Y01 K2 Transformer station will be used
Length of the route (km)	Underground energy transmission line (350 meters)
Voltage level (kV)	-
Number of ETL towers (pylons)	None
Total footprint area per each ETL tower (m ²)	None
Number of parcels subject to expropriation	None
Number of parcels subject to easement rights	None

Figure 4 . Map of ETL Route



2.1.4. Associated Facilities

There are not any associated facilities of the Sub-project.

2.1.5. Sub-project Impact Area

According to the WB ESSs, “where the project includes specifically identified physical elements, issues and facilities likely to generate impacts, environmental and social risks and impacts will be defined as the project impact area (IA).” Thus, the IA of the subproject consists of urban or rural areas likely to be affected by the project, its activities and the facilities directly owned, operated, or managed (including by contractors/subcontractors).

The impact area of the subproject covers the following environmental and social aspects:

The sub-project area, surrounding settlements, and access roads were evaluated to determine the Impact Area (IA). When a circle with a radius of 600 m was drawn around the sub-project area to determine the Impact Area (IA), the closest settlements were two livestock farms located within the boundaries of the Ağırnas neighborhood.

Additionally, the closest residential areas to the sub-project are nine houses located on the access road to Ağırnas neighborhood. Although these houses are 600 meters away from the sub-project area, they are located on the access road to the sub-project and therefore pose a traffic risk. For this reason, these houses have been assessed within the Impact Area. On the other hand, agricultural lands adjacent to the sub-project area are evaluated within the project Impact Area due to potential dust and traffic impacts.

It has been determined that the owner of one of the plots adjacent to the sub-project area partially cultivated the sub-project area while cultivating his own field, as the sub-project area merges with his field. A consultation meeting was held with the owner of this land. The landowner stated that he had mistakenly crossed the boundary of the sub-project area, which had not yet been marked with a wire fence, and planted crops there; that the harvest season had passed; that he would take the sub-project boundary into account during the planting season and would not cross it; that he carried out agricultural activities in other areas; and that this land was not his only source of income (the consultation form is provided in the Annex A).

Considering the environmental and social impacts that the subproject may cause, it has been determined that the local residents living in the center of the Ağırnas neighborhood will not be affected by dust and noise from topsoil removal operations or traffic risks. Therefore, the center of the Ağırnas neighborhood has not been included in the IA of the subproject.

Figure 5. Map of Settlements and Livestock Farms Near the Sub-Project Area



2.1.6. Environmental and Social Baseline

This section contains information about the environmental and social conditions of the sub-project's impact area. Some of this information is based on face-to-face interviews conducted on March 5, 2025, with Kayseri KASKI officials and the Muhtar of Ağırnas neighborhood. Additionally, a face-to-face meeting was conducted with one of the owners of livestock farms located near the sub-project area, and a telephone conversation was held with the other. Where necessary, data from relevant public institutions and professional organizations were utilized.

Table 7 presents a summary of the baseline field studies conducted as part of the ESMP study.

Table 7 . Summary of Baseline Field Studies

Subject	Date of the Field Study	Experts who Participated in the Field Study
Environmental and Social Field Research & Meeting with the Muhtar of Ağırnas Neighborhood & Consultation Meeting with the Owner of a Livestock Farm	05.03.2025	Environmental Engineer/Expert Social Expert

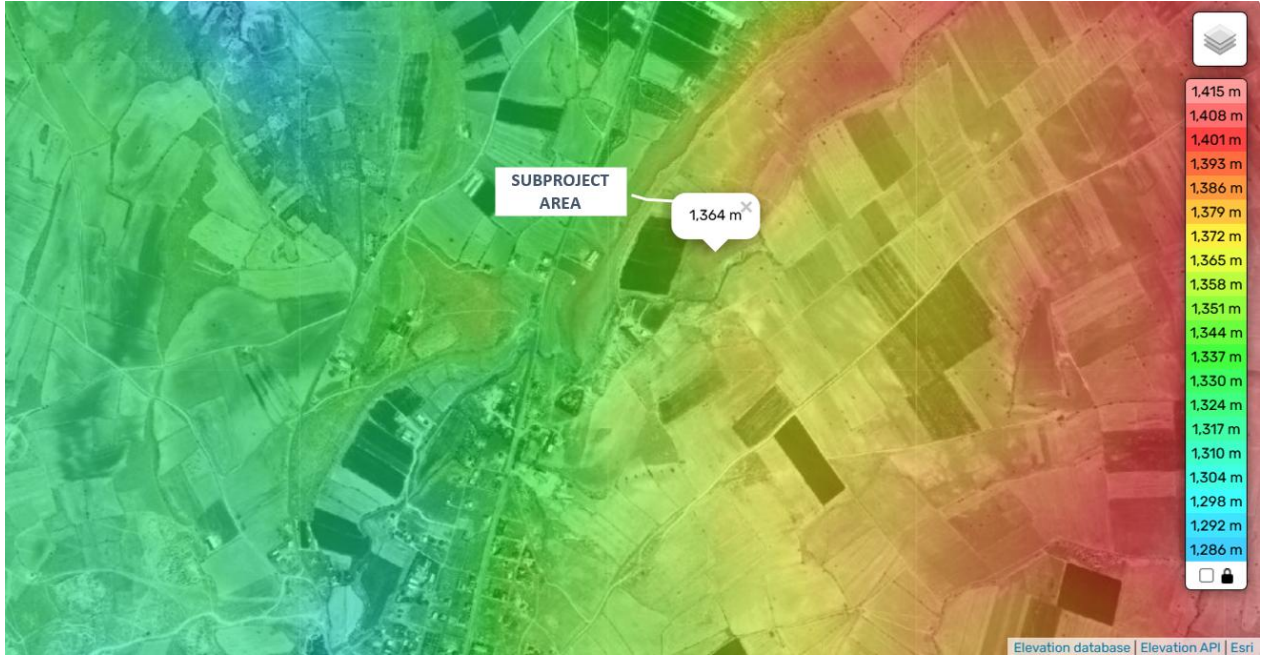
2.1.6.1. Physical Environment

The sub-project area was examined by environmental and social experts, and the current environmental and social conditions were characterized based on literature research and field visit observations. No questionnaire was conducted for the sub-project area. Interviews with the Muhtar of Ağırnas Neighborhood and data obtained from the institution were used as references.

2.1.6.1.1. Topography

The sub-project area is located in the Ağırnas neighborhood of Melikgazi district, Kayseri province, at coordinates 38.834735 and 35.731360, 24 km northeast of the city center. Access to the sub-project area is possible by road, and it is situated on a flat terrain with a slope of 1°-5° and an elevation of 1,364 meters. Infrastructure is provided by the relevant municipality. The sub-project area and its surroundings have a flat topography. The study determined that there is no potential for rainfall-induced mass movement (landslides, rockfalls, subsidence, craters, soil flow), flooding, or avalanches in the project area and its immediate surroundings. This situation can be seen in the topography map of the sub-project area, which is taken from the approved Soil Study Report and presented below.

Figure 6. Topographic Map



2.1.6.1.2. Geology

According to the report prepared by TMMOB Chamber of Geological Engineers, Kayseri city center is located on a northeast-southwest trending plain at the foot of Mount Erciyes. Geologically, it is largely composed of very young volcanic rocks and alluvial deposits that fill the plain where the city center is located. Below is a geologic map (1/500,000 scale) of the region prepared by the Directorate of Mineral Research and Exploration (MTA), a geologic map of the subproject area prepared by the survey firm, and a section of the earthquake hazard map of Kayseri province prepared by the Disaster and Emergency Management Presidency showing the subproject area (see Figure 77). Kayseri city center is one of the cities with alluvial soils. Earthquake waves are magnified by such soils and transmitted to buildings. This situation, which is defined as ground amplification, means that in the event of an earthquake, Kayseri city center will be shaken more severely than the city centers located on rock type soil units, and as a result, the damage rate will be higher. The edges of this tectonic depression, called the Sultansazlığı check-slip basin, are bounded by active faults, the most important of which are the Erkilet fault zone in the north, the Gesi fault zone, the Yeşilhisar fault zone in the southwest and the Develi fault in the southeast. The Erciyes fault is located in the central part of the basin². The earthquake risk status (PGA475) of the subproject area is 0.169 (see Figure 88), so the earthquake risk is low.

² https://kayseri.afad.gov.tr/kurumlar/kayseri.afad/Egitim/Kayseri_IRAP_Baski.pdf

AFAD Türkiye Deprem Tehlike Haritaları
İnteraktif Web Uygulaması

Adres Sorgulama

Raporlama

Gözetim Harita Kontrolü

Bilgi AI Koordinata Giriş

Yakılay Uzaklay

Ölçme Aracı Kaydır

Haritaları Temizle Vardır

Sorulan Sorulan

Arama...

Enlem: 38.8348331 Boylam: 35.7313426

SUBPROJECT AREA

Kodun Adı	Değer
PGA 475	0.215 g
Enlem	38.83473281765404°
Boylam	35.731385562267796°

PGA 475 (g)

0.1 0.2 0.3 0.4 0.5

Harita Ölçeği

1/18.055

0.5 km

Google

Ekave kaynakları | Görüntü ©2025 Airbus, CNES / Airbus, Maxar Technologies | Harita | Harita hatası bildir

2.1.6.1.3. Meteorology and Climatic Characteristics

The subproject is within Melikgazi district borders. According to the data of the General Directorate of Meteorology, the summer season in the district is hot and dry, while the winter season is cold and rainy. With this situation, it reflects the characteristics of continental climate, which is the typical climate of the Central Anatolia Region. The hottest months are July and August (40,5° C). The coldest months are December, January and February. Precipitation usually occurs in the fall and spring seasons. The average monthly precipitation of the district is around 23.4 mm. Kayseri province has approximately 3282.57 hours of sunshine throughout the year and an average of 107.77 hours of sunshine per month.

2.1.6.1.4. Air Quality

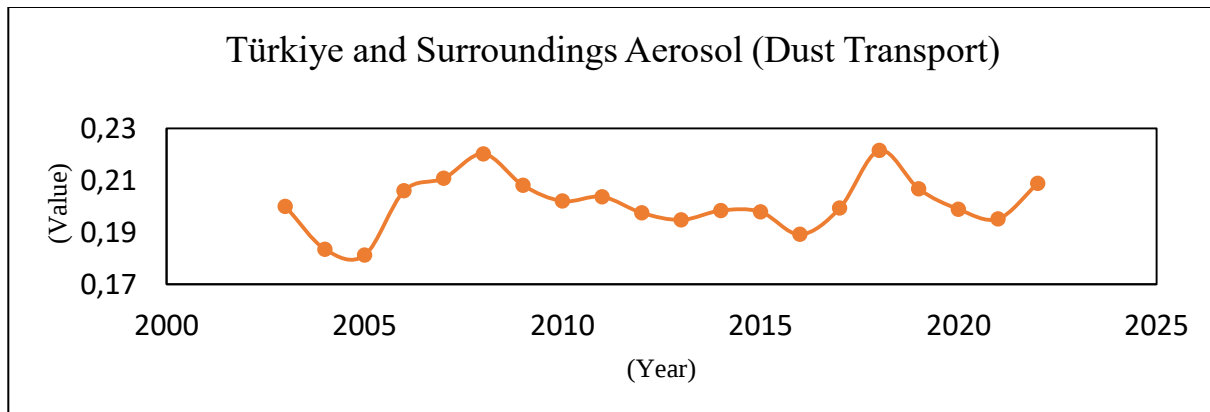
According to the data of the Central Station, which is the continuous monitoring center of the Ministry of Environment, Urbanization and Climate Change, the air quality level is "MEDIUM -(56) " in Melikgazi district. The table dated 21.08.2024 is presented below.

Table 8. Air Quality Monitoring Table

Measurement	Value
PM	1010 µg/m ³
NO	210 µg/m ³
CO	170 µg/m ³

Aerosol (Dust Transport) Analyses of the General Directorate of Meteorology for Türkiye and its Surroundings covering the years 2003-2022 are given below. The average dust value for the region is given as 0.2012.

Figure 9. Aerosol (Dust Transport) Analyses



2.1.6.1.5. Noise

Only two livestock farms (50 m and 200 m away) were identified as noise sources near the sub-project area.

2.1.6.1.6. Water Resources

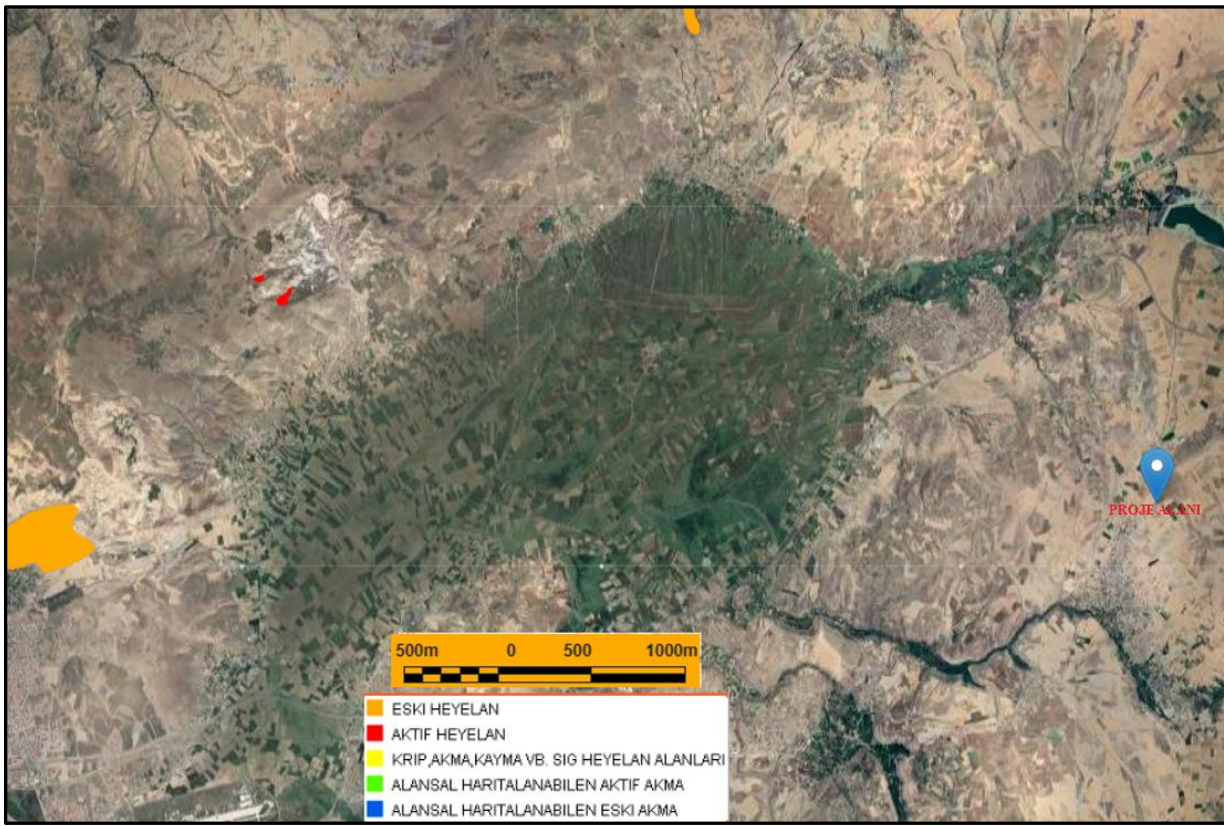
Investigations conducted in the sub-project area revealed that there are no water sources in the vicinity. The closest water source outside the impact area is the Sarımsaklı Dam Reservoir, located 6 km away.

The sub-project is located on land belonging to KASKİ, and there are two drinking water tanks within the sub-project area. One of these water tanks has a capacity of 200 m³ and is old and unused. The other water tank has a capacity of 250 m³ and is used to supply water to the settlements in the Ağırnas neighborhood.

2.1.6.1.7. Natural Hazards (such as flooding, landslides, fire etc.)

The Kayseri Provincial Disaster and Emergency Management Directorate has stated that there is no Disaster-Prone Area decision under Law No. 7269 in the area where the sub-project will be implemented. It has been stated that there is no project planned for disasters in the aforementioned region (Figure 100). As indicated under the heading of topography and presented on the topography map, there are no risks such as landslides, rockfalls, subsidence, soil erosion, etc. in the sub-project area and its surroundings.

Figure 10. Landslide Map³



2.1.6.2. Biodiversity

The subproject area is not located within “National Parks”, ‘Nature Parks’, ‘Nature Monuments’ and ‘Nature Protection Areas’ defined in Article 2 of the National Parks Law and designated in accordance with Article 3 of the said Law. The nearest protected area is the Palas Lake Wetland, located approximately 18.5 km west of the sub-project area.

According to national laws and regulations, the sub-project area is not within “Wildlife Protection Areas, Wildlife Development Areas and Wild Animal Settlement Areas” determined in accordance with the Land

³ Maden Tetkik ve Arama Genel Müdürlüğü

Hunting Law; “Cultural Assets”, “Natural Assets”, “Protected Areas” and “Protected Areas” and areas identified and registered in accordance with the Law No. 3386 dated 17/6/1987 and the relevant articles of the same Law; Aquaculture and Breeding Areas within the scope of the Fisheries Law; the areas defined in the relevant articles of the Regulation on Water Pollution Control; areas determined and declared as “Special Environmental Protection Zones” by the President of the Republic pursuant to Article 9 of the Environmental Law; areas considered as forest areas pursuant to the Forestry Law; areas specified in the Law on the Improvement of Olive Groves and Grafting of Wild Olives; areas specified in the Pasture Law; areas specified in the Regulation on the Protection of Wetlands.

Also, the subproject area is not located within the areas protected under the “Convention for the Conservation of European Wildlife and Habitats” (BERN Convention) that include “Important Sea Turtle Breeding Areas I and II. Protected Areas, “Mediterranean Monk Seal Habitats and Breeding Areas”, areas protected under the “Convention for the Protection of the Mediterranean Sea against Pollution” (Barcelona Convention), areas protected under the “Convention for the Protection of the Mediterranean Sea against Pollution” (Barcelona Convention), areas included in the list of “100 Coastal Historic Sites of Common Importance in the Mediterranean” published by the United Nations Environment Program, selected in accordance with the Genoa Declaration, “cultural and natural heritage assets” inscribed on the World Heritage List in accordance with Articles 1 and 2 of the Convention for the Protection of the World Cultural and Natural Heritage, and protected areas in accordance with the Convention for the Protection of Wetlands of International Importance, especially as Waterfowl Habitats (RAMSAR Convention) according to international conventions.

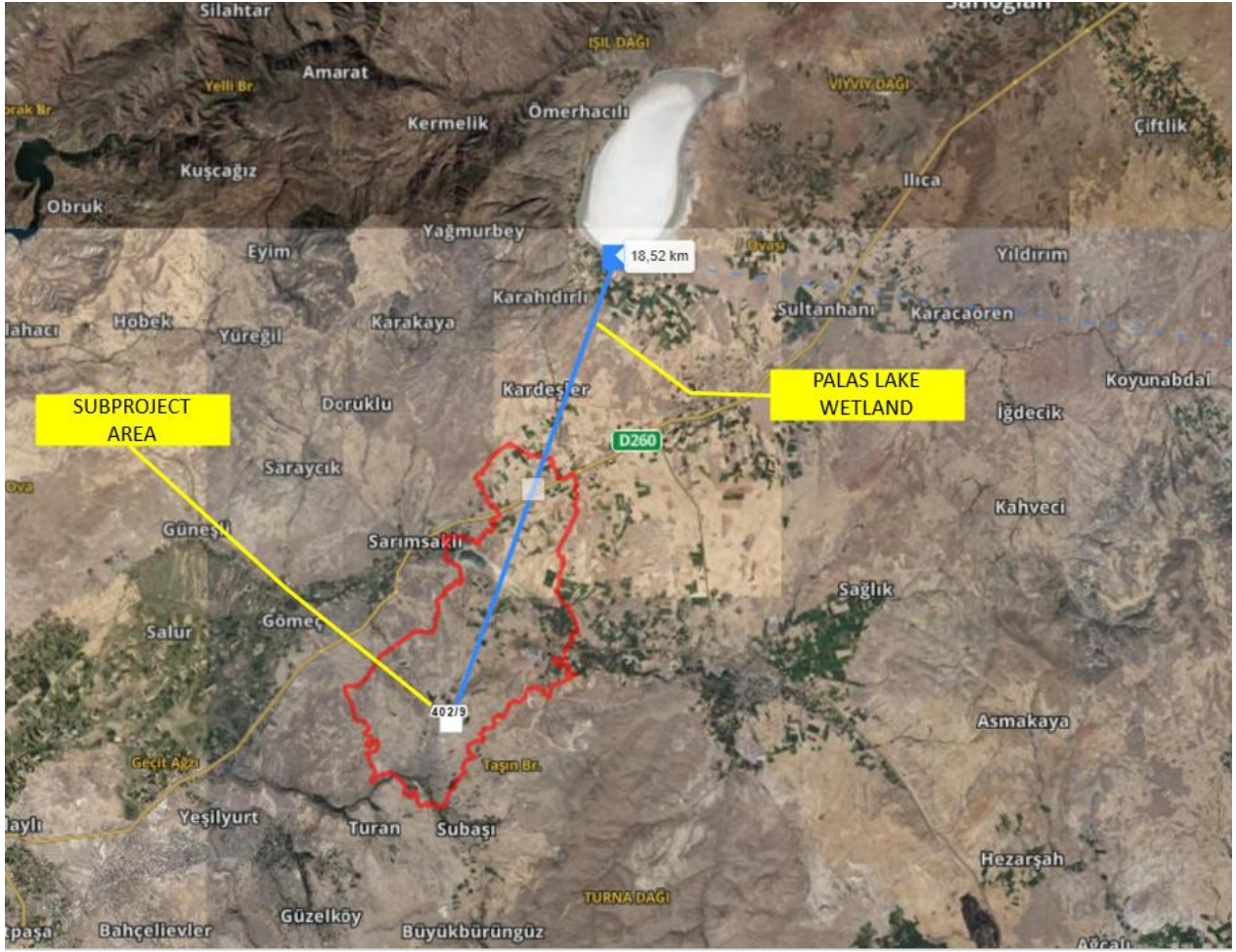
As part of the work carried out for the Project Presentation File, biodiversity assessments were conducted and no endemic flora or fauna species were identified in the sub-project area.

Protected Areas

The closest protected area to the sub-project area is the Palas Lake Wetland, approximately 18.5 km away. There are no other legally protected and internationally recognized areas in the vicinity of the sub-project area. Only topsoil stripping and a 350 m excavation for the power line will be carried out in the sub-project area. Since no construction activities such as quarrying, crushing plants, or blasting will be carried out in the sub-project area, it is unlikely that the solar power plant will directly impact the protected area.

Please see Figure 11 for the nearest protected areas.

Figure 11. Palas Lake Wetland Protected Area⁴



2.1.6.3. Socio-Economic Environment

A field study on the socio-economic situation of Ağırnas Neighborhood was conducted on March 5, 2025, and a face-to-face interview was held with the neighborhood headman. Much of the information in this section is based on the information obtained from this interview.

2.1.6.3.1. Demography and Population

The sub-project area is located within the boundaries of the Ağırnas neighborhood of Melikgazi District, one of the central districts of Kayseri Province. The sub-project area is 26 km from Melikgazi District, 1.5 km from Ağırnas neighborhood, and 24 km from Kayseri city center. The nearest settlement to the sub-project area is the Ağırnas neighborhood, which is under the administration of the Melikgazi District Municipality. The neighborhood headman of Ağırnas stated that the neighborhood has a population of approximately 3,000. According to 2024 TÜİK data, the population of the Ağırnas neighborhood is 2,659. Figure 12 below shows the distance between the sub-project area and Kayseri city center, as well as the distance between the sub-project area and the nearest household to this area.

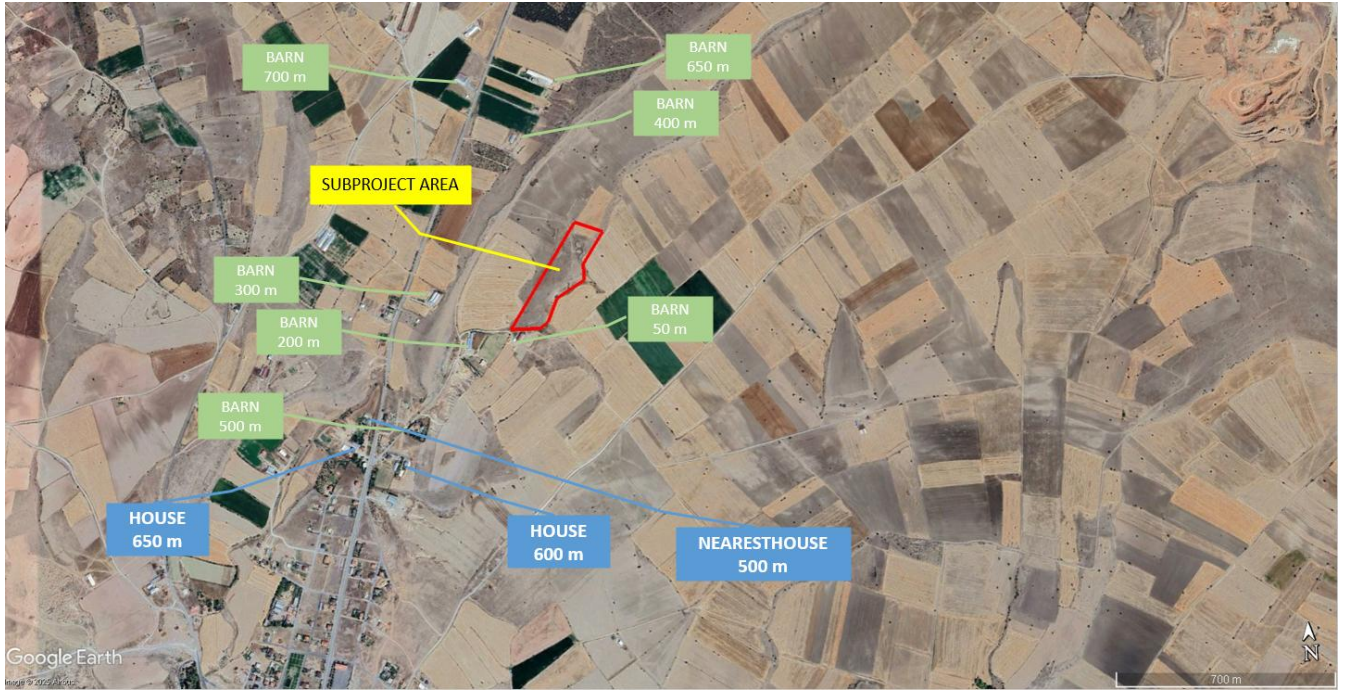
⁴ <https://www.arcgis.com/apps/View/index.html?appid=5f3978146c4643438ab446620e275269>

This aerial map of the Kayseri region highlights the project area in a yellow box in the upper right. A red line indicates the distance from the project area to the Kayseri city center, which is marked with a red box and labeled 'KAYSERİ CENTRUM 24.000 m'. A blue line shows the distance from the project area to the nearest house, marked with a blue box and labeled 'NEAREST HOUSE 50 m'. The map includes various geographical features, roads, and place names such as Kayseri, Tavlusun, Kocak, and several districts like Gazi Bagimar and Gazi Kuzey. A scale bar at the bottom right indicates a distance of 5 km, and a north arrow is located in the bottom right corner.

There are nine households within the scope of the sub-project. Residents of Ağırnas neighborhood are primarily engaged in agriculture and livestock farming. Agricultural lands and livestock areas are not affected by the sub-project. However, there is a case of an unofficial user being affected. The owner of the land adjacent to the sub-project area crossed the sub-project boundary while planting crops on his own field. A consultation meeting was held with him. The landowner stated that he had inadvertently crossed the sub-project boundary to plant crops because the boundary had not yet been marked with a wire fence, that the harvest season had passed, that he would take the sub-project boundary into account during the planting season and would not cross it, that he carried out agricultural activities in other areas, and that this land was not his sole source of income. It should also be noted that this user does not belong to a vulnerable group.

12

Figure 13. Map showing the distance of the sub-project area from residential areas



2.1.6.3.3. Employment and Means of Livelihood

According to information obtained from the headman of Ağırnas neighborhood, the main source of income for most households in the neighborhood is agriculture and animal husbandry. The headman also stated that there are people working in various public institutions and in the industrial sector.

Additionally, the Mimar Sinan Women's Cooperative is located in the neighborhood, and it was learned from the mukhtar that nine women work at the cooperative, producing plant-based aspir oil specific to this region and sustaining their livelihoods by selling the products they produce.

Limited agricultural use had previously been identified in the sub-project area, and it was confirmed in discussions with the relevant user that these activities did not constitute the household's primary source of income and were not commercial in nature, and that the household carried out agricultural activities in other areas.

2.1.6.3.4. Education and Health Services

There is a primary school named Osman Yücel and a vocational and technical high school named Mimar Sinan in Ağırnas Neighborhood.

There is a Family Health Center named Nadide Yücel in Ağırnas Neighborhood that provides health services. This center provides primary health care services during working hours. The neighborhood headman of Ağırnas stated that the residents of the neighborhood go to the Melikgazi district center and the Kayseri provincial center for secondary and tertiary health care services.

2.1.6.3.5. Infrastructure Services

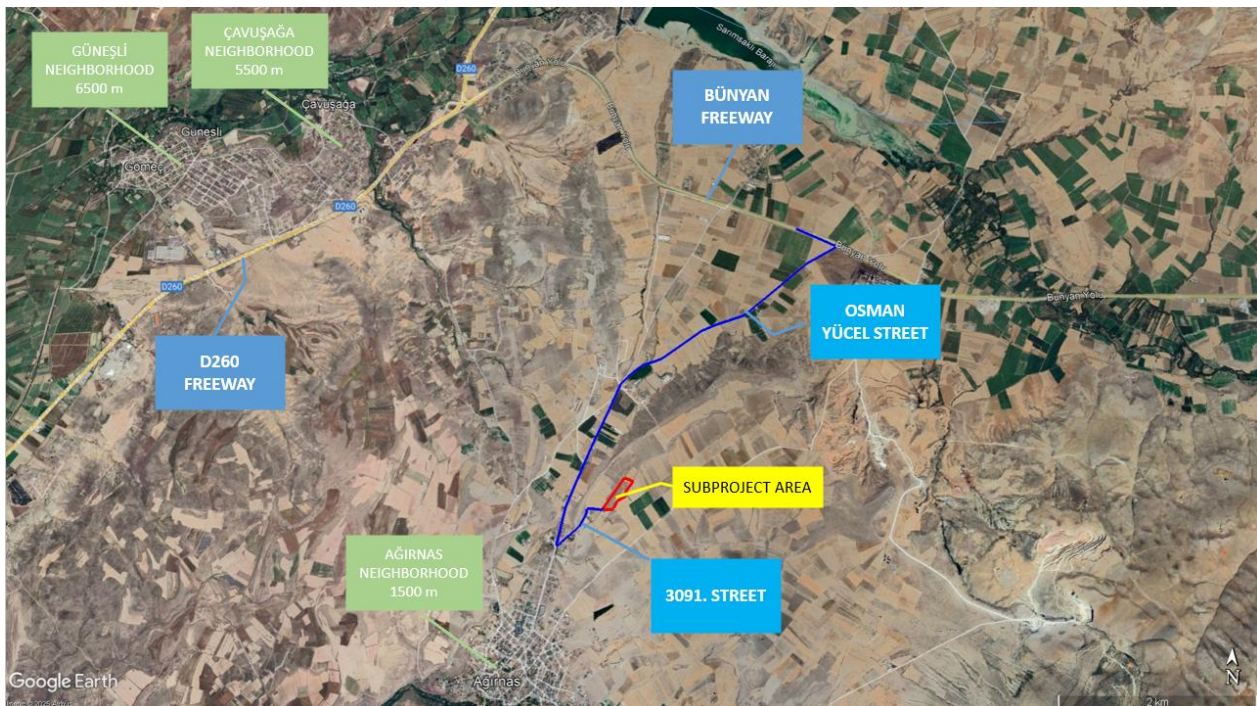
The Ağırnas neighborhood has drinking water and sewage networks, natural gas, and electricity infrastructure. Household waste is regularly collected and disposed of by the Melikgazi Municipality.

2.1.6.3.6. Transportation and Traffic

There is a public transportation system in the neighborhood. The neighborhood headman has stated that municipal buses operate between 5:45 a.m. and 12:30 a.m. Personal vehicles are also used for transportation.

The roads passing through the neighborhood will not be used to reach the sub-project area. Instead, the highway (D260) continuing from Kayseri to Sivas will be used to reach the road leading to Bünyan District. Then, the sub-project area will be reached via the secondary road leading to Ağırnas neighborhood from this road, and from there to 3091st Street. During transportation, the route will pass through a settlement with a few households in the rural part of the Ağırnas neighborhood. Bünyan Freeway and Osman Yücel Street are asphalt paved. But the road leading to the sub-project area isn't asphalt paved. This road is unpaved and narrow. This situation may have certain potential effects. To minimize these effects, Kayseri KASKİ will carry out road improvement works before the sub-project activities commence. The following diagram shows the route to be used to access the sub-project area via the highway.

Figure 14. Access Road of Sub-project Area



2.1.6.3.7. Cultural Heritage (Tangible and Intangible)

The Kayseri Regional Directorate for the Protection of Cultural Heritage stated in its opinion letter in Annex B that there are no cultural assets in the sub-project area. An Chance Finds Procedure has been prepared to be implemented in case any findings are encountered during the construction phase, and it is presented in Annex H. Construction activities will be carried out in accordance with this procedure.

2.1.6.3.8. Vulnerable and Disadvantage Groups

As a result of the meeting with the head of Ağırnas neighborhood, the vulnerable and disadvantaged groups in the neighborhood are listed in **Table 9** below:

Table 9. Vulnerable and Disadvantaged Groups of Ağırnas Neighborhood

Group	Number	Explanation
Disabled Individual	6	It was found that there are a total of 6 disabled individuals in the neighborhood, 3 of whom have physical disabilities and 3 of whom have mental disabilities
Over 65 Years of Age Living Alone	30	It has been stated that there are 30 female heads of households in the neighborhood.
Immigrants and Refugees	11	It was learned that 11 Syrian refugees were living in the neighborhood. The neighborhood mukhtar stated that all of them made a living by working as shepherds.

The roads in the Ağırnas neighborhood will not be used during the sub-project works, and the construction works will not affect the daily functioning of the neighborhood. Transportation and vehicle traffic will not be provided from the center of the Ağırnas neighborhood. Therefore, the Sensitive and Disadvantaged Groups defined in Table 9 will not be negatively affected by the sub-project.

3. SUB-PROJECT DESCRIPTION

3.1. Construction Phase

3.1.1. Construction Activities

Construction activities will be completed in 6 (six) months. Detailed implementation schedule envisaged for the construction phase activities (including provisional acceptance) is presented in Chapter **Hata! Başvuru kaynağı bulunamadı..**

Construction phase activities are briefly described below:

- Pre-construction activities:

Since the sub-project area is not rugged and consists of rock and soil surfaces, only topsoil stripping and 350 m of power line trenching will be carried out during the site preparation phase. There are no trees in the sub-project area.

- Construction/ installation activities:

During the construction phase of the sub-project, the area will be fenced off with wire mesh before work begins. This will prevent unauthorized access to the sub-project area and ensure occupational and public health and safety. A temporary camp area consisting of an office, canteen, restroom, and security booth will be set up for use by personnel working on the sub-project. The steel structure will be installed by drilling holes into the ground using a pile-driving machine (rock machine) in the sub-project area. Solar panels will be installed on the steel structure. Instead of being buried, the electrical cables between the panels will be laid on the ground surface using cable channels. After the steel structure and panel installation are completed, the power connections will be connected to the distribution center transformer station to be established within the sub-project site. The power connection between the distribution center transformer building and the sub-project site will be made using underground cables, with approximately 350 meters of excavation required.

- Construction machinery and equipment:

During the construction phase of the sub-project, pile driving (rock machine) equipment, graders, water tankers (water trucks), forklifts, cranes, and excavators will be used.

- Water use and wastewater management:

Dust formation is anticipated during the construction phase due to topsoil removal and excavation/filling. In addition, some of the roads providing access to the sub-project area from outside (approximately 2,500 m) are not paved, which will cause dust formation due to vehicle movement and transportation. Vehicle movement within the sub-project area will also cause dust formation. Therefore, as an additional measure, watering will be carried out on the sub-project access road and work area, necessitating a water source and water tanker. The contractor will use the water source specified and authorized by KASKİ and will carry out watering at regular intervals on the sub-project access road and work area to prevent dust formation. The nearest surface water source to the sub-project area is the Sarımsaklı Dam Reservoir, approximately 6 km away. No adverse effects from the sub-project works are expected to occur at the Sarımsaklı Dam Reservoir.

The sub-project works will not affect groundwater resources. A leak-proof septic tank will be used for wastewater disposal, and wastewater will be collected in the septic tank. The domestic wastewater treatment plant located 50 km away from the sub-project work area will handle wastewater disposal. Wastewater will be regularly transported to the wastewater treatment plant by KASKİ's vacuum trucks. The drinking water needs of the workers will be met with bottled water.

- Waste and hazardous materials management:

The construction process will generate various types of waste, including general construction debris, packaging materials and small amounts of damaged or unused panels containing hazardous materials. Hazardous materials consist primarily of fuels and oils used for machinery. All waste will

be handled in accordance with local regulations and hazardous materials will be properly stored and disposed of in accordance with environmental standards.

- Use of other resources and materials:

There will be no backfilling and no hazardous chemical substances will be used during the construction phase. In case of need, it is envisaged to use concrete in quantities to be procured from local suppliers. The fuel for the construction machinery to be used during the construction phase will be procured from suppliers, no fuel will be stored within the sub-project site and no fuel storage tank will be installed.

- Supply of materials and equipment:

- Panels: Panels will be procured from domestic manufacturers that meet high efficiency and durability criteria. Preference will be given to photovoltaic panels produced in Türkiye to ensure cost advantages and support the local industry.
- Steel Construction: Durable steel structures suitable for field conditions will be sourced from domestic manufacturers. Long-lasting coatings against corrosion and materials in compliance with engineering calculations will be used.
- Inverters: Inverters will be procured from foreign suppliers, considering criteria such as efficiency, warranty period, and technical support. The choice between central or string inverters will be determined based on site requirements.

Other Electrical Equipment (Solar Plant Materials):

- Cables and Cable Management Systems: Locally produced solar cables of appropriate cross-section will be used for both DC and AC sides. Cable trays and conduit systems will also be sourced from domestic suppliers.
- Transformer and Switchgear Equipment: Transformer stations suitable for power transmission lines will be planned using domestic production. Circuit breakers, disconnectors, and other electrical protection systems to be used in the switchyard will be supplied from local manufacturers.
- Grounding and Lightning Protection: Locally produced grounding rods, conductors, and lightning protection systems will be used to ensure the safety of the solar plant.
- Monitoring and Supervisory Control and Data Acquisition (SCADA) Systems: Local software and hardware will be preferred to enable facility performance monitoring.
- Supply Planning: Considering cost, quality, logistics, and procurement timelines, all equipment except inverters will be sourced from domestic manufacturers. For imported inverters, reliable international companies will be selected.

- Test and commissioning:

Before the solar power plant is put into operation, a series of tests and commissioning procedures will be conducted to ensure safe and efficient performance. The key steps include:

- Visual and Mechanical Inspections: Verification of proper installation of panels, mounting structures, cabling, and other equipment.
- Electrical Testing: Insulation resistance tests, continuity checks, and voltage measurements to confirm proper wiring and grounding.
- Inverter Commissioning: Configuration, functional checks, and synchronization of inverters with the domestic grid frequency.
- Performance Testing: Measurement of power output under different conditions to verify system efficiency.
- Protection and Safety Tests: Checking circuit breakers, surge protection devices, and relay settings to ensure electrical safety.

- SCADA and Monitoring System Integration: Testing remote monitoring, data logging, and communication with the grid operator.
- Final Grid Connection and Approval: Coordinating with the utility company for final inspections and obtaining the necessary approvals for grid connection.

All tests will be conducted in compliance with international and local standards to ensure the reliability and long-term performance of the solar power plant.

- Decommissioning of temporary construction facilities:

After the completion of the solar power plant construction, all temporary facilities used during the project will be systematically dismantled and removed. The key steps include:

- Dismantling of Temporary Structures: Offices, storage units and other temporary buildings will be disassembled and removed from the site.
- Removal of Construction Equipment and Materials: Any remaining construction materials, scaffolding, and machinery will be transported off-site or repurposed.
- Site Cleaning and Waste Management: Construction debris and packaging materials will be properly collected, sorted, and disposed of in accordance with WB ESSs and environmental regulations.
- Land Restoration: The project site will be restored to its planned operational state, ensuring compliance with environmental and aesthetic requirements.
- Final Inspection and Handover: A final site assessment will be conducted to confirm that all temporary facilities have been removed and the area is ready for long-term solar power plant operation.

All decommissioning activities will be carried out in accordance with local regulations and Good International Industry Practice.

There will be no activities related to the Subproject outside the scope of the proposed financing.

3.1.2. Construction Facilities

Construction facilities to be used during construction activities are listed in Table 10.

Temporary construction facilities will be dismantled and removed from the site after the sub-project construction phase is completed. Waste generated during the dismantling of temporary construction facilities will be separated according to the ESSs and national legislation and disposed of if necessary.

Table 10 . Construction Facilities

Type	On-site or Off-site	Temporary or Permanent	List of Facilities
Construction Camp Site	On-site	Temporary	• Office container • Toilets and connected septic tank. • Dining hall container • Security lodge

A layout of the construction camp site is presented in Figure 15 . Figure 15.

Figure 15 . Construction Camp Site Layout



3.2. Operation Phase

3.2.1. Operation Activities

1. Operation and Maintenance (O&M):

- Routine Inspections: Regular checks will be carried out on panels, inverters and electrical components.
- Preventive and Corrective Maintenance: Repair and replacement of defective parts will be carried out when necessary.
- Monitoring Systems: SCADA and Energy Monitoring Systems will be used to monitor plant performance.

2. Panel Cleaning:

- Water-Based or Dry Cleaning: Panels are cleaned with soft brushes, water or robotic cleaners using machines specially built for use with solar panels only. Panel cleaning will be done with water only, no chemical cleaners will be used.
- Water Source: Water from local sources or storage tanks.
- Cleaning Equipment: Non-abrasive tools (cloths, sponges or brushes, etc.) or robotic systems.

3. Vegetation Control:

- Mowing/Crushing: Regular removal of weeds and vegetation will be ensured.

4. Site Security:

- Fencing and Gates: A secure perimeter will be created with controlled access.
- Security Guards and Closed-Circuit Television (CCTV): On-site guards and surveillance cameras for monitoring.

5. Control Building and Systems:

- Control Room: Monitors plant performance and manages system alarms.
- Communication Systems: Used for coordination and emergencies.

3.2.2. Operation Facilities

Operation facilities are described in Table 11.

Table 11 . Operation Facilities

Component	Characteristics
Solar panels	Monocrystalline 545 Wp Panel
Mounting structures	Galvanized Steel and Aluminum Fixed Tilt Structure
Inverters, transformers, etc.	110 kW On-Grid Inverter PID Protective Smart String Inverters, Hermetic Power Transformer Autoproducer Switchgear, DC Solar Cables, AC Cables, Auto TMS, SPP Specialized Electrical Panels with Circuit Breakers and Disconnectors.
Control room, building, system, etc.	Remote Control SCADA System, Energy Monitoring and Management System, Inverter Control Panels Aka Dataloggers, Protection and Security Systems such as Fire Detection and Suppression Systems, CCTV Systems and Alarm Systems. Communication and Remote Internet Access Systems, Backup Power Systems, Climate Control Systems.
Energy monitoring system	SCADA and Datalogger Smart Inverter Compatible Energy Monitoring System Tracks the Performance of Solar Panels, Helps in Fault Detection and Maintenance Planning. It Would Monthly Generate Performance Reports.

Grounding system	TT system Grounding Rods, Grounding Conductors, Grounding Busbar, Equipotential Bonding Bar
Lightning protection system	Lightning Rods Mounted on High Metal Poles Which Connected to Power Plant's Grounding Line to Protect and Avoid Lightning-Induced Overvoltage.
Fire preparedness and firefighting facilities	Overcurrent Protection Devices (Fuses and Circuit Breakers) Integrated Equipment, Arc Fault Circuit Interrupters (AFCI), Portable Fire Extinguishers, Automatic Fire Suppression Systems (FM-200, CO2, Water-Based, Or Foam-Based Systems), Water Sprinkler Systems
Security facilities	Shift Patterns On-Site Security Guards, Main Entrance Gates, Security Gates, Vehicle Access Control, Remote Monitoring CCTV Surveillance Systems, Perimeter Lighting, Two-Way Radios.

3.3.Labor Requirements

Number of workers (at peak) that will work on site during the construction and operation phases of the Sub-project are provided in Table 12. During the construction phase of the Subproject, workers will be transported to the work site by shuttles.

Table 12 . Labor Requirements of the Sub-project

Phase	Number of Workers (including contractors and subcontractors)	Planned Accommodation Arrangement
Construction Workers (at peak)	25 People	Off-site
Operation Workers (at peak)	1 Person	KASKI staff/Off-site

3.4. Land Acquisition Status

The parcel required for the Kayseri KASKİ AĞIRNAS-SPP 2,20 MWe sub-project has been the property of Kayseri KASKİ since 2017. The total area of the parcel is 40.408,26 m² of which 30.000 m² is reserved for the sub-project area.

The pole to which the power transmission line will be connected is located within the parcel adjacent to the sub-project area. Kayseri KASKİ has written an official letter to KCETAŞ, the electricity distribution company, requesting that the pole be moved within the sub-project area. KCETAŞ has officially stated in writing that the number of pole HC0099 will not be changed after the pole relocation process.

In addition, no land acquisition is required for the energy transmission line. A 350-meter underground energy cable will be laid within the same parcel and connected to the transformer building to be established within KASKİ AĞIRNAS-GES. No land acquisition will be required for the construction and operation phases of the sub-project. Information regarding the sub-project land is provided below:

Land acquisition status of the parcel to be used by the Sub-project is summarized in Table 13.

Table 13 . Land Acquisition Status for the Sub-project

Sub-project Component	Lot/ Parcel No.	Current Land Ownership	Type of Parcel (according to Title Deed)	Land Acquisition Method	Title Deed Area of the Parcel (m ²)	Area to be Used by the Sub-project (m ²)	Status of Land Acquisition
SPP Area	402/9	Kayseri KASKI	Field	None	40.408,26	30.000	The parcel has been owned by

							Kayseri KASKİ since 2017. The Kayseri KASKİ AĞIRNAS-GES 2.20 MWe sub-project is planned in the 402 block, 9 parcel of the Ağırnas neighborhood, Melikgazi district, Kayseri province. The aforementioned parcel has an area of 40,408.26 m ² , with 30,000 m ² to be used for the project area. The title deed for the parcel is provided in Annex C.
ETL	402/9	Kayseri KASKİ	Field	None	40.408,26	350 m	Underground power cables (350 m) will be laid within the same parcel on parcel 9 of island 402 and connected to the KASKİ-Ağırnas GES transformer building.

3.5. Permitting Status

The status of permits, licenses and approvals that need to be obtained before the subproject construction phase starts is presented in Table 14.

Table 14 . Status of Permits for the Construction Phase

Permit, License, Approval	Status (In place, Not in place)	Remarks/ Notes
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EIA Decision for the Power Plant	In place	Annex II activity as per the EIA Regulation in force (Official Gazette Date: 29.07.2022; Official Gazette No: 31907) EIA is not Required Decision (Decision Date: 03.01.2024; Decision No. 27332451 220-02 E-20247) has been secured from the Kayseri Governorship Provincial Directorate of Environment, Urbanization and Climate Change– Annex B. (*) Decision shall be considered invalid in case the investment is not initiated within 5 years of the Decision without any force majeure.
Zoning plan approval	In place	With the decision of Kayseri Metropolitan Municipality dated 14.08.2023 and numbered 336, a zoning plan change decision was made on the parcel containing the subproject area. The decision is presented in the Annex B.
Permit for non-agricultural land use	In place	The opinion of the Kayseri Governorate Provincial Directorate of Agriculture and Forestry dated 20.06.2023 and numbered 622.02-34046 is attached as Annex B..
Cultural Heritage Protection Board	In place	The opinion of the Kayseri Governorate Provincial Directorate of Culture and Tourism Tourism Affairs Branch Directorate is presented in Annex B.

Status of permits, licenses, approvals required for operation phase are listed below:

- Obtaining Construction License and Fire Safety Report from Kayseri Metropolitan Municipality
- Electricity Generation License Application, Call Letter and Connection Agreement with the Relevant Grid Operator
- Preparation of Electrical, Mechanical and Related Engineering Projects for the Approval of the Relevant Energy Company and Obtaining University Expert Approval for Structural Projects.

4. ESMP MATRIX: RISK AND IMPACTS, MITIGATION AND MONITORING

As the Sub-project involves both construction and operation activities, the ESMP consist of two components applicable to respective Sub-project phase, as follows:

- Construction ESMP Matrix
- Operation ESMP Matrix

Roles and responsibilities related to implementation of this ESMP is defined in Section 5.2.

Implementation arrangements for ESMP implementation are described in Section **Hata! Başvuru kaynağı bulunamadı..**

Contractor's E&S management plans and procedures that will support implementation of the E&S assessment documents are listed in Section **Hata! Başvuru kaynağı bulunamadı..**

4.1. E&S Risk and Impacts of the Sub-project

This section identifies potential environmental and social impacts and risks that may arise from Subproject activities during construction and operation phases.

Sub-Project activities are generally categorized as follows:

- Construction phase,
- Operation phase,

The overall potential environmental and social impacts expected for the Subproject are presented below.

4.1.1. Construction Phase

4.1.1.1. Environmental Impacts and Risks

During the construction phase, excavation and filling work will be carried out because the sub-project area consists of rock and soil and the topsoil will be removed and an underground power transmission line will be constructed. Therefore, environmental impacts will be limited to dust formation, noise, and waste production. Additionally, approximately 2,500 meters of the access road is a dirt road, which will cause dust formation during vehicle and freight transportation.

4.1.1.1.1. Soil Contamination

The sub-project area consists of stone and soil, and failure to respond promptly to accidental fuel and oil spills (caused by fuel and motor oil used in construction machinery) may result in fuel and oil seeping into the soil. The use of heavy machinery during the construction phase may result in accidental fuel and oil spills in the sub-project area, posing a risk of soil contamination. The uncontrolled storage or disposal of solid and/or liquid waste generated within the scope of the sub-project may result in the risk of soil contamination.

4.1.1.1.2. Impacts on Biodiversity

The field studies and literature reviews conducted in the sub-project area, along with the flora and fauna studies and biodiversity assessment, are outlined in the GES Assessment Report. When evaluating the floristic list of the sub-project area and its surroundings, none of the plant species protected and prohibited from trade under CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora), signed in Washington on March 3, 1978, are found in the area.

Furthermore, plant species protected under the Convention on the Conservation of European Wildlife and Natural Habitats (BERN), which Turkey officially ratified on January 9, 1984, are not found within the project area.

Among the plant taxa identified in the project area and its immediate surroundings, there are no species classified as “CR (Critically Endangered); EN (Endangered); VU (Vulnerable)” according to the IUCN threat criteria. Additionally, among the identified plant taxa, there are no “flagship species” representing the Kayseri region and the area, nor any “key species” to be used in monitoring the ecosystem. Therefore, there are no plant taxa that require monitoring.

When the project area is evaluated in accordance with the legal regulations under the jurisdiction of both the Ministry of Agriculture and Forestry, General Directorate of Nature Conservation and National Parks, and the Ministry of Environment and Urbanization, it is classified as National Parks (NP) and Nature Conservation Areas (NCA) based on ecologically protected areas. Wildlife Relocation Areas (WRA),

Nature Parks (NP), Natural Monuments (NM), Ramsar Sites (RS), Wetlands (WL), and Special Environmental Protection Areas (SEPA).

As a result of field studies and supplementary literature reviews, five reptile species were identified in the planned activity area and its immediate vicinity. These are: Field Lizard (*Ophisops elegans*), Black Tortoise (*Testudo graeca*), Cappadocia Lizard (*Apathya cappadocica*), Spiny Lizard (*Stellagama stellio*), and Gentle Snake (*Eirenis modestus*). These species are not endemic. The Black Tortoise (*Testudo graeca*) is in the category “VU” (Vulnerable) according to IUCN. However, tortoise is a widely spread reptile species found in every region in Türkiye.

There are no species identified in the project area and its immediate surroundings that are recommended for monitoring. Furthermore, there are no “key species” representing the Kayseri region and the area, nor any “key species” that can be used to monitor the ecosystem among the species identified.

As a result of fieldwork, literature reviews, and interviews conducted within the project implementation area and ecological impact boundaries, 31 mammal species were found to inhabit the project area and ecological impact areas.

As a result, among the wild animals and fauna taxa identified in the sub-project area and its immediate surroundings, there are species that must be protected under agreements such as the IUCN, Bern Convention, CITES Agreement, Central Hunting Commission Decisions, etc. There are no endemic species among these taxa. Additionally, among the identified wild animals and fauna taxa, there is no “flagship species” representing the Niğde region and area, nor is there a “key species” to be used in monitoring the ecosystem. Therefore, there is no species among the identified wild animals and fauna taxa that requires monitoring.

The necessary mitigation measures to prevent/reduce impacts on biodiversity are presented in Sections 4.2 and 4.3 of the Construction and Operation ESMP matrices.

4.1.1.1.3. Dust and Exhaust Gases Emission

During the construction phase, dust formation will occur due to topsoil stripping. There is a risk that people in the nearby settlement and primary school students at a distance of 500 m will be adversely affected by dust formation. During construction, there will be exhaust emissions from heavy construction machinery. The primary emissions from vehicle exhaust gases are NO₂, CO, HC, SO₂ and PM. Exhaust emissions are expected to be minimal due to limited use of vehicles and machinery.

4.1.1.1.4. Noise Pollution

Noise pollution may occur during the construction phase due to the operation of heavy machinery and especially the driving of steel poles into the ground, and there is a risk that primary school students may be adversely affected by noise.

4.1.1.1.5. Impacts Associated with Water, Energy and Raw Materials Use

Worker needs will create water supply requirements. Construction phase activities will require the consumption of resources such as concrete, reinforcement, structural steel, energy, etc. The risk of human pollution from construction camps, due to wastewater production from construction work and workers, may particularly affect groundwater quality.

4.1.1.1.6. Waste

During the construction phase of the Subproject, activities such as procurement, transportation and installation of panels, electrical cables, steel materials and equipment will be carried out. The types of solid waste expected to be generated from these activities include municipal solid waste, packaging waste from system equipment (e.g. wood, cardboard, plastic, etc.), hazardous waste, electronic waste, construction waste (e.g. scrap metal, wood, concrete waste, etc.) and waste system equipment (panels, cables, electronic components). Hazardous and special waste may include contaminated packaging materials and rags contaminated with chemicals (e.g. paints, solvents, panels, inverters, etc.) or oils, waste oils from the operation and maintenance of machinery and vehicles, solvents, accumulators, batteries, filters, machine parts.

There is also a risk of uncontrolled discharge of domestic wastewater generated by the needs of workers.

4.1.1.2. Social Impacts and Risks

4.1.1.2.1. Occupational Health and Safety and Labor

Construction works can cause incidents and accidents that may threaten the health and safety of workers if measures are not taken proactively.

Potential health and safety risks during the construction have been listed below.

- Extreme weather conditions
- Working at height,
- Moving objects and construction equipment
- Hand and Power Tools
- Slips and trips and falls
- Noise vibration and exposure to dust,
- Materials handling and ergonomics,
- Unintended collapse, lifting and rigging bulky materials,
- Electric shock,
- Lack of use of appropriate personal protective equipment,
- Traffic related risks due to increased traffic and commute to work
- Unauthorized access to the facility
- Associated risk of occupational accidents, injuries, and diseases,

Hazards due to unhygienic or unsanitary living conditions, etc. Occupational health and safety risks and mitigation measures will be managed in line with the Subproject's Labor Management Procedure and OHS Management Plan which is in line with national legislation, Occupational Health and Safety Law (Law No: 6331, Effective Date: 20/06/2012) and related OHS Legislation, World Bank ESS2 and World Bank Group General Environmental Health and Safety Guidelines.

4.1.1.2.2. Community Health and Safety

The subproject will benefit the community in terms of improved access to municipal services, which may increase local job opportunities. During the construction period, it is anticipated that approximately 25

people will be employed under the sub-project. Considering that priority will be given to local labor in employment, a labor influx is not expected. Considering the employment of local labor, there will be no need for a camp area for workers. Therefore, potential impacts such as accidents, pressure on existing social infrastructure, sexual exploitation and abuse, sexual harassment (SEA/SH), and diseases will be minimized.

Before construction work begins, the sub-project area will be marked off with wire fencing. To protect materials remaining in the sub-project area at night and to prevent unauthorized entry in general, an unarmed guard will be stationed within the sub-project area.

The sub-project has identified the following potential Community Health Safety (CHS) impacts resulting from the construction phase.

- Accidents caused by unauthorized access of community members (especially children) to sub-project site (both construction and operation phases)
- Road damage in transportation and traffic; increased risk of traffic and road accidents and injuries,
- Emergencies resulting from contextual risks (e.g. earthquakes, fires, etc.)
- Noise and vibration,
- The threat to community culture, safety and security posed by the presence of construction workers and business opportunists,
- Impacts due to labor influx and interaction of temporary workers with the community (such as sexually transmitted diseases (STDs), Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) risk,

4.1.1.2.3. Labor and Working Conditions

A maximum of 25 people will work during the subproject construction phase. Although local employment will be prioritized, there is a small risk of an influx of workers.

Working and accommodation conditions will need to comply with World Bank standards (ESS 2).

4.1.1.2.4. Traffic

The roads passing through Ağırnas Neighborhood will not be used to reach the sub-project area. Instead, the highway (D260) continuing from Kayseri to Sivas will be used to reach the road leading to Bünyan District. Then, by entering the secondary road leading to Ağırnas neighborhood from this road and reaching 3091st Street, the sub-project area will be reached. During transportation, a small settlement located in the rural part of Ağırnas neighborhood will be passed. Therefore, the traffic impact of the sub-project is expected to be limited.

4.1.1.2.5. Loss of Land and Livelihoods

As no land acquisition process will be carried out within the scope of the subproject, no negative impact on land is expected. Therefore, there will be no negative impact on livelihoods.

4.1.1.2.6. Vulnerable Groups

The subproject will not have any social negative impacts on the lives of specific vulnerable groups such as persons with disabilities, children, elderly, refugees and livelihood dependent groups. The subproject will have no impact on daily life and habits in the nearest settlement.

4.1.1.2.7. Cultural Heritage

As stated in the Environmental and Social Baseline section, there are no registered cultural heritage sites in and near the subproject area. Therefore, no negative impact on cultural heritage is expected during the construction phase. However, if any findings are identified during construction activities, the Chance Find Procedure will be applied (see Annex H).

4.1.1.2.8. Technical and Social Infrastructure Services

Considering the existing Environmental and Social Baseline data and the construction duration of the subproject, no negative impact on technical and social infrastructure services in the region is expected during the construction phase of the subproject.

4.1.2. Operation Phase

4.1.2.1. Environmental Impacts and Risks

During the operation phase, environmental impacts and risks will be limited to the production of domestic waste and domestic wastewater generated by 1 personnel working at the facility.

4.1.2.1.1. Waste

There is a risk that the wastes (electronic wastes, panels, inverters, cables, electronic components) generated after maintenance-repair and breakdowns are not regularly stored and disposal processes are not carried out in accordance with national legislation and World Bank ESSs.

In addition, there is a risk that the domestic waste generated by 1 personnel working at the facility will not be collected by the municipality and the domestic wastewater will be discharged uncontrolled and cause environmental pollution.

4.1.2.2. Social Impacts and Risks

Due to the location and nature of the sub-project, social impacts and risks during the operational phase are limited.

4.1.2.2.1. Occupational Health and Safety

Potential health and safety risks for the operational phase of the subproject are listed below:

- Working at height: Risk of falling from height during maintenance and repair of panels
- Electricity: Risk of electric shock, arc flash and insulation breakdown in cables and failure to follow “Lock Out Tag Out Procedure”
- Material handling: Physical and ergonomic risk when replacing panels or transporting battery systems.

- Risks associated with use of machinery and equipment used in repair and maintenance work.
- Fire: Risks of short circuit fires, battery explosions, etc.
- Unauthorized access to the facility
- Risk associated with occupational accidents, injuries, and illnesses.

4.2. Construction ESMP Matrix

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Relevant Plans/Procedures
ESS2 - Labor and Working Conditions					
1.	Working Conditions	Employees	- Toolbox trainings will be implemented on weekly basis to consist of the OHS Plan and Labor Conditions. - Labor Management Plan will be implemented for recruiting and managing all employees. - Child labor forced labor and unregistered labor will be prohibited as of the Labor Management Plan. - Employees will be provided with documented information that is clear and understandable, regarding their rights under national labor law; including collective agreements, their rights related to hours of work, wages, overtime, compensation, and benefits as of startup of working relationship and when any material changes occur. - The Grievance Mechanism for employees will be implemented. The employees will be informed about the grievance mechanism at the time of recruitment, and it will be made easily accessible to them.	Contractor (preparation of management plans and procedures, implementation of E&S requirements, and execution of construction activities) Supervision Consultant (audit and review of E&S management documents, as well as construction monitoring and reporting activities) KASKI (monitoring E&S performance and reporting to ILBANK)	- C-ESMP - Workers Grievance Mechanism - Safe work procedures - Sub-contractor agreement templates - Employment templates - Induction Training Plan - Employment records - LMP
2.	General OHS Risks	Employees	- A complete risk assessment document addressing the Sub-project specific risks and defining mitigation measures will be prepared. - All employees including the subcontractors will receive necessary OHS training covering the risks. - Personnel who have not been trained in OHS and are not aware of all risks will not be allowed to enter the work site.	Contractor (preparation of management plans and procedures, implementation of E&S requirements, and execution of construction	Risk Assessment document OHS Management Plan OHS Training Plan Emergency Preparedness and

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Relevant Plans/Procedures
			- All Sub-project management plans including safe work procedures and emergency action plans will be prepared. - Safety procedures and appropriate Personal Protective Equipment (PPE) will be used when working at height. - OHS Trainings will include the safety procedures. - In case of any OHS incidents and/or accidents, the Contractor will immediately (within 24 hrs) inform ILBANK PMU and follow up with completing ESIRT forms, as instructed by ILBANK. This will include root cause analysis and corrective action plan.	activities) Supervision Consultant (audit and review of E&S management documents, as well as construction monitoring and reporting activities) KASKI (monitoring E&S performance and reporting to ILBANK)	Response Plan
3.	OHS - Physical Hazards: Electrical Hazards	Employees	<u>General Measures</u> - Ensure that all energized electrical devices and lines are marked with warning signs - Ensure that the devices are locked (de-charging and leaving open with a controlled locking device) and labeled (warning sign placed on the lock) during service or maintenance. - Ensure that all electrical cords, cables, and hand power tools are checked for frayed or exposed cords. Also, ensure that the manufacturer's recommendations for the maximum permitted operating voltage of portable hand tools are followed - Ensure that all electrical equipment used in environments that are or may be wet is double insulated/grounded; use equipment with ground fault interrupter (GFI) protected circuits. - Ensure that power cords and extension cords are protected against damage from traffic by shielding or suspending above traffic areas - Ensure that high-voltage equipment and service rooms where access is controlled or prohibited are properly labeled ('electrical hazard')	Contractor (preparation of management plans and procedures, implementation of E&S requirements, and execution of construction activities) Supervision Consultant (audit and review of E&S management documents, as well as construction monitoring and reporting activities) KASKI (monitoring E&S	Risk Assessment document OHS Management Plan OHS Training Plan Emergency Preparedness and Response Plan

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Relevant Plans/Procedures
			• Ensure that "No Approach" zones are established around or under high voltage lines. • Ensure that construction vehicles or other vehicles with rubber tires that come into direct contact with or arc across high-voltage cables are taken out of service for 48 hours. • Ensure that all buried electrical cables are thoroughly identified and marked prior to any excavation work. <u>Site-specific Measures</u> • Relevant safety procedures will be established, and employees will be trained on these procedures to prevent the risk of electric shock and injury to employees during the installation of electrical equipment. • Safety fences will be constructed around electrical areas and no materials will be stored in or near these areas. • Contractor and subcontractor electricians will be well trained and those without a certificate of professional competence will not be employed in electrical work. • Electricians will be provided with suitably insulated Personal Protective Equipment (PPE) and work tools and will be made aware of the risk of electric shock and protection techniques. • First aid workers trained in first aid in case of electric shocks will be employed by the contractor and subcontractor. • Work will not be carried out in rainy weather conditions. • Warning signs will be placed in areas with electrical hazards and all safety measures (e.g. hard barriers) will be implemented to prevent workers from being exposed to these areas. • Toolbox talks will provide information about assembly work and electrical hazards and unqualified personnel will not be assigned to electrical work.	performance and reporting to ILBANK)	
4.	OHS - Physical Hazards: Industrial Vehicle Driving and Site Traffic	Local communities Employees	<u>General Measures</u> • Ensure that industrial vehicle operators are trained and certified in the safe use of specialized vehicles such as forklifts, including safe loading/unloading, load limits.	Contractor (preparation of management plans and procedures, implementation of	Risk Assessment document OHS Management Plan

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Relevant Plans/Procedures
			• Make sure drivers undergo medical supervision regularly. • Ensure that moving equipment with restricted rear visibility is equipped with audible back-up alarms and employ banksmen/flagmen when required. • Ensure that rights of way, site speed limits, vehicle inspection requirements, operating rules and procedures, and control of traffic patterns or direction are established. • Ensure that deliveries and movement of private vehicles are restricted to defined routes and areas, with 'one-way' movement preferred where appropriate. <u>Site-specific Measures</u> • All vehicles used in transportation activities shall comply with the speed limits specified in the Road Traffic Regulation. • Vehicle speed will be limited to 30 km/h on unpaved roads. • Safe traffic control measures such as road warning signs, speed humps and flag staff will be used where necessary, especially at the transition from the ring road to the side access road. • Any damage to the side access road will be repaired and restored. • An emergency response plan will be prepared, and necessary protocols will be established for possible infrastructure failures, accidents or natural disasters that may occur during construction. • Heavy construction machinery working in the subproject area will not be operated or maneuvered without a flagman or signaler. • All drivers will receive road safety training.	E&S requirements, and execution of construction activities) Supervision Consultant (audit and review of E&S management documents, as well as construction monitoring and reporting activities) KASKI (monitoring E&S performance and reporting to ILBANK)	OHS Training Plan Emergency Preparedness and Response Plan
5.	OHS - Physical Hazards: Ergonomics, Repetitive Motion, Manual Handling Lifting	Employees	<u>General Measures</u> • Ensure that mechanical assists are used to eliminate or reduce the effort required to lift materials, hold tools and work objects, and that more than one person is lifting if weights exceed thresholds. • Ensure that tools are selected and designed that reduce force requirements and holding times and improve postures. • Ensure that user-adjustable workstations are provided.	Contractor (preparation of management plans and procedures, implementation of E&S requirements, and execution of construction activities)	Risk Assessment document OHS Management Plan OHS Training Plan

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Relevant Plans/Procedures
			- Ensure that rest and stretch breaks are incorporated into work processes and job rotation is in place. - Ensure quality control and maintenance programs are in place that reduce unnecessary forces and effort. - Ensure that additional special circumstances, such as left-handed people, are considered. <u>Site-specific Measures</u> - For manual handling and lifting, workers will be informed of the carrying capacities set out in the regulation and will be provided with the means to transport materials that are not suitable for manual handling. - Site workers will be provided with information and training on manual handling, including healthy lifting techniques. - Implementation of safe transportation techniques will be ensured. - Manual handling operations will be kept to a single level, ground conditions will be improved, and environmental conditions will be enhanced. The ground will be kept clear of obstacles. - Appropriate Personal Protective Equipment (PPE) and safety equipment will be used.	Supervision Consultant (audit and review of E&S management documents, as well as construction monitoring and reporting activities) KASKI (monitoring E&S performance and reporting to ILBANK)	
ESS3 - Resource Efficiency and Pollution Prevention and Management					
	Air Emissions and Ambient Air Quality				
6.	Emissions to air due to construction activities	Local communities Employees Flora & Fauna	<u>General Measures</u> - Ensure use of dust control methods, such as covers, water suppression, or increased moisture content for open storage piles. - Ensure use of water suppression for control of loose materials on paved or unpaved road surfaces. <u>Site-specific Measures</u> - Modern equipment and vehicles in compliance with relevant emission standards will be used during construction works.	Contractor (preparation of management plans and procedures, implementation of E&S requirements, and execution of construction activities) Supervision Consultant (audit	Stakeholder Engagement Plan

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Relevant Plans/Procedures
			- Exhaust emission measurements of work machines and vehicles will be carried out on time and vehicles exceeding the limit values will not be used in the subproject. - Measures will be taken to prevent and/or reduce dust formation during topsoil stripping works and dust suppression methods will be applied with water tankers. - In case of dust formation on the side access road providing access to the subproject area, water suppression method will be applied with water tankers. - Speed limit will be applied for Transport Trucks. - A grievance mechanism will be implemented.	and review of E&S management documents, as well as construction monitoring and reporting activities) KASKI (monitoring E&S performance and reporting to ILBANK)	
	Wastewater and Ambient Water Quality				
7.	Generation and discharge of wastewater due to construction activities	Surface water resources	<u>General Measures</u> - Ensure water is used efficiently to reduce the amount of wastewater generation - Ensure that waste minimization and process modification, including reduction of the use of hazardous substances, is carried out to reduce the load of pollutants requiring treatment. - Septic will be used for wastewater disposal and treatment, ensure that the following requirements are met: - Properly designed and installed in accordance with local regulations and guidance to prevent any hazard to public health or contamination of land, surface or groundwater. - Well maintained to allow effective operation. - Installed in areas with sufficient soil percolation for the design wastewater loading rate. - Installed in areas of stable soils that are nearly level, well drained, and permeable, with enough separation between the drain field and the groundwater table or other receiving waters.	Contractor (preparation of management plans and procedures, implementation of E&S requirements, and execution of construction activities) Supervision Consultant (audit and review of E&S management documents, as well as construction monitoring and reporting activities) KASKI (monitoring E&S performance and	Waste management plan

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Relevant Plans/Procedures
			<u>Site-specific Measures</u> - Domestic wastewater generated in the subproject area will be collected in sealed septic tank located in the camp site. - KASKI's vacuum trucks will regularly transfer the wastewater to the WWTP. - Kayseri Wastewater Treatment Plant located 50 km from the subproject area will be used to treat all wastewater generated. - No uncontrolled wastewater discharge will be allowed during the subproject lifetime.	reporting to ILBANK)	
	Waste Management				
8.	Generation of waste during construction activities	Local communities Employees Flora & Fauna	<u>General Measures</u> - Establish waste management priorities at the outset of activities based on an understanding of potential Environmental, Health, and Safety (EHS) risks and impacts and considering waste generation and its consequences. - A waste management hierarchy that considers prevention, reduction, reuse, recovery, recycling, removal and finally disposal of waste will be established. - Ensure that waste segregation and storage in temporary waste storage areas is managed according to the standards set out in the GIIP and relevant legislation. - Ensure that waste is classified and labeled according to waste codes. - Ensure that data and information is collected on waste streams generated under the project, including characterization of waste streams by type, quantity and potential use/disposal. - Ensure that raw materials or inputs are substituted with less hazardous or toxic materials or with materials for which processing produces lower waste volumes. - Ensure that good housekeeping and operational practices, including inventory control, are established to reduce the amount of waste from materials that are outdated, out-of-specification, contaminated, damaged or in excess of facility needs.	Contractor (preparation of management plans and procedures, implementation of E&S requirements, and execution of construction activities) Supervision Consultant (audit and review of E&S management documents, as well as construction monitoring and reporting activities) KASKI (monitoring E&S performance and reporting to ILBANK)	Waste management plan Stakeholder Engagement Plan

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Relevant Plans/Procedures
			- Ensure that the generation of hazardous waste is minimized by implementing strict waste segregation to avoid mixing of non-hazardous and hazardous waste to be managed. <u>Site-specific Measures</u> - A covered temporary waste storage area will be established within the subproject area, which will not be affected by weather conditions, in order to accumulate wastes under appropriate conditions. - Personnel responsible for the temporary waste storage area will be assigned and identification signs will be posted indicating the types of waste to be generated and the responsible personnel. - All waste generated during the construction phase will be sorted and labeled according to type and class and stored in the temporary waste storage area. - The contractor will have a waste disposal protocol with licensed recycling and disposal company. - All waste will be included in the recycling and disposal process through licensed recycling companies within the period specified in the regulations for waste types. - Separate sections will be created in the temporary waste storage area for different waste types and measures will be taken to prevent hazardous wastes from reacting. - Fire risk and precautions will be taken into consideration in the temporary waste storage area and fire extinguishing equipment will be kept in accessible locations. - All waste generated during the subproject will be recycled or disposed of and no waste will be buried, incinerated or disposed of uncontrolled. - Domestic waste generated during the construction phase of the sub-project will be collected and disposed of by waste collection vehicles belonging to the Melikgazi municipality.		
9.	Generation of hazardous waste during construction activities	Soil Quality Employees Flora & Fauna	Ensure that operators are trained on release prevention, including drills specific to hazardous materials as part of emergency preparedness and response training.	Contractor (preparation of management plans and procedures,	Waste management plan

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Relevant Plans/Procedures
			• Ensure a description of response activities in the event of a spill, release or other chemical emergency, including: ○ Internal and external notification procedures ○ Specific responsibilities of individuals or groups ○ Decision process for assessing severity of the release and determining appropriate actions. ○ Facility evacuation routes ○ Post-event activities such as clean-up and disposal, incident investigation, employee re-entry, and restoration of spill response equipment. • Ensure that appropriate PPE (footwear, masks, protective clothing and goggles in appropriate areas), emergency eyewash and shower stations, ventilation systems and sanitary facilities are provided. • Ensure that contaminated waste (contaminated soil, contaminated materials, etc.) generated after spill and release response is transferred to the Hazardous Waste Storage Area in the temporary waste storage area to prevent further contamination. • Ensure that monitoring and record-keeping activities and accident and incident investigation reports, including audit procedures designed to verify and record the effectiveness of the prevention and control of exposure to occupational hazards, are kept on file for at least five years.	implementation of E&S requirements, and execution of construction activities) Supervision Consultant (audit and review of E&S management documents, as well as construction monitoring and reporting activities) KASKI (monitoring E&S performance and reporting to ILBANK)	
	Noise				
10.	Noise generation due to construction	• Local community • Project Site Surroundings • Fauna species	<u>General Measures</u> • Manage the potential impact of noise, selecting equipment with lower sound power levels. • All Sub-project personnel including direct and contracted workers will be trained on the implementation of ESMP. • Ensure implementation of Sub-project-specific SEP in order to address any noise-related grievance and plan/take corrective actions, where necessary. • Ensure consultation with PAPs prior to the start of and during the construction activities to be conducted at this location in order to inform	Contractor (preparation of management plans and procedures, implementation of E&S requirements, and execution of construction activities) Supervision Consultant (audit	Stakeholder Engagement Plan

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Relevant Plans/Procedures
			stakeholders about the scope and duration of the activities and mitigate the potential impacts for the period of construction. <u>Site-specific Measures</u> - Night work will not be allowed during the construction phase of the subproject. - Working hours will be between 09:00 in the morning and 18:00 in the evening. - The livestock farms in the surrounding area and the residents of the Ağırnas neighborhood will be informed about the timing and content of the construction activities covered by the SEP. - The machinery and equipment used during land preparation and construction works will not be operated at the same point but distributed homogeneously over the area. - Regular and periodic maintenance of work machines and equipment and daily checks will be carried out in each shift. - All vehicles used in transportation activities shall comply with the speed limits specified in the Road Traffic Regulation. - A grievance mechanism will be established to receive grievances from local communities.	and review of E&S management documents, as well as construction monitoring and reporting activities) KASKI (monitoring E&S performance and reporting to ILBANK)	
ESS4 - Community Health and Safety					
	Traffic Safety				
11.	Road safety	Local Communities Road Users Road Infrastructure	<u>General Measures</u> - Monitoring the licensing and professional competence of the drivers employed in the sub-project. - Avoiding dangerous routes and times of day to reduce the risk of accidents. - Ensure use of speed control devices (governors) on trucks, and remote monitoring of driver actions - Roads passing through settlements will be avoided whenever alternative routes are available. If sub-project traffic routing through the settlements is not avoidable, all necessary traffic management measures will be taken. The	Contractor (preparation of management plans and procedures, implementation of E&S requirements, and execution of construction activities) Supervision Consultant (audit	Traffic Management Plan Stakeholder Engagement Plan

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Relevant Plans/Procedures
			local communities and if necessary local authorities will be informed about the transportation routes and schedule. - Scheduling of traffic will be undertaken to avoid the peak hours on the local road network wherever practicable (e.g. early in the morning with the daylight). Scheduling information and planned traffic disruptions will be communicated well in advance to all related parties including authorities, local communities and nearby businesses. <u>Site-specific Measures</u> - All vehicles used in transportation activities shall comply with the speed limits specified in the Highway Traffic Regulations. - Vehicle speed will be limited to 30 km/h on the site access road. - Safe traffic control measures such as warning signs, speed humps and flagger/marker personnel will be provided along the sub-project access road. - Any damage to the roads will be repaired. - An emergency preparedness and response plan will be prepared, and necessary protocols will be established for possible infrastructure failures, accidents or natural disasters that may occur during construction. - Operators and drivers will receive road safety training and their driving licenses will be registered. - During the logistics process, there will be no material transportation during peak hours due to the high risk of accidents. Material transportation will be carried out at appropriate times when traffic is low, thereby minimizing the risk of traffic accidents. - Signals and flaggers will be deployed to prevent large and long transportation vehicles from causing accidents and traffic congestion at the entrance to the subproject site.	and review of E&S management documents, as well as construction monitoring and reporting activities) KASKI (monitoring E&S performance and reporting to ILBANK)	
12.	Sexual Exploitation and Abuse (SEA)/Sexual Exploitation/ Sexual Harassment (SE/SH)	Local Communities	- Where possible and feasible, local employment options will be considered at all stages of the sub-project. - All sub-project staff will be trained on Code of Conduct at induction to minimize the impact of cultural differences.	Contractor (preparation of management plans and procedures, implementation of E&S requirements,	Stakeholder Engagement Plan GM

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Relevant Plans/Procedures
			- Workers will be trained on SEA/SH and CoC and those involved in sexual exploitation will have their employment contracts terminated. - It will be mandatory for project employees to sign the CoC. - Women's complaints of sexual abuse will be handled in a confidential manner and women staff (e.g. Women Social Workers) will be employed within the grievance mechanism to ensure that these complaints are shared. - The content of E&S trainings to be provided to project employees will include Sexual Exploitation and Sexual Harassment - Guards who will perform their duties unarmed will receive training on public health safety and behavioral rules.	and execution of construction activities) Supervision Consultant (audit and review of E&S management documents, as well as construction monitoring and reporting activities) KASKI (monitoring E&S performance and reporting to ILBANK)	
13.	Impacts on vulnerable and disadvantaged individuals and groups	Local Communities	Although the subproject does not pose significant risks to vulnerable groups, additional stakeholder engagement measures will remain in place. Support will be provided in accordance with the project specific SEP, such as transportation to stakeholder engagement activities.	Contractor (preparation of management plans and procedures, implementation of E&S requirements, and execution of construction activities) Supervision Consultant (audit and review of E&S management documents, as well as construction monitoring and reporting activities)	Stakeholder Engagement Plan GM

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Relevant Plans/Procedures
				KASKI (monitoring E&S performance and reporting to ILBANK)	
14.	Grievance Mechanism	Local Communities Employees	- As indicated in the Roles and Responsibilities table; KASKI will establish a Grievance Mechanism for the project and ensure its effective operation throughout the life cycle of the project with İLBANK. - SEP to be updated annually and if there are significant changes in the Project. - The implementation of the Stakeholder Engagement Plan (SEP) and Grievance Mechanism will be the responsibility of KASKI PIU. - Visibility of the SEP and Grievance Mechanism will be ensured, including contact details of staff responsible for grievance handling. - Posters and brochures will be prepared to increase the accessibility of the complaint mechanism and the visibility of the project and will be distributed to all residents of the Ağırnas neighborhood and workers at nearby livestock farms. - All records received through the grievance mechanism and other channels will be recorded in a grievance log for the duration of the project. - Brochures and posters containing information about the complaint mechanism will be posted at the Ağırnas neighborhood mukhtar's office and information will be provided.	Contractor (preparation of management plans and procedures, implementation of E&S requirements, and execution of construction activities) Supervision Consultant (audit and review of E&S management documents, as well as construction monitoring and reporting activities) KASKI (monitoring E&S performance and reporting to ILBANK)	Stakeholder Engagement Plan GM
ESS5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement					
15.	Land Acquisition, Restrictions on Land Use	Local Communities	It will be ensured that construction activities do not restrict/obstruct the social and economic life of the local community.	Contractor (preparation of	Stakeholder Engagement Plan

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Relevant Plans/Procedures
	and Involuntary Resettlement		- There will be no expropriation under the sub-project. - Private and public lands outside the project work area will not be entered and all measures will be taken to prevent this. - The sub-project area will be fenced off and designated prior to the construction phase. The owners or users of adjacent land will be informed before construction activities commence.	management plans and procedures, implementation of E&S requirements, and execution of construction activities) Supervision Consultant (audit and review of E&S management documents, as well as construction monitoring and reporting activities) KASKI (monitoring E&S performance and reporting to ILBANK)	GM
ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources					
16.	Natural habitats	Flora and Fauna Species Birds, Reptiles - Frogs and Mammals	- No work will be carried out outside the designated Subproject area and natural habitats will not be harmed. - Before the subproject construction works start, the area will be inspected and checked for the presence of stray and wild animals within the work area. The efforts to encourage species to leave the area should be carried out gradually at the beginning of the work. - If any living creatures are encountered, they will be taken out of the work area and the area will be secured with fencing. - In order to reduce negative effects such as damage to nests and young individuals due to the removal of topsoil, and the displacement of bird, reptile-amphibian, and mammal species due to dust and noise, irrigation will	Contractor (preparation of management plans and procedures, implementation of E&S requirements, and execution of construction activities) Supervision Consultant (audit and review of E&S	C-ESMP

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Relevant Plans/Procedures
			be carried out and visual inspections will be conducted in the sub-project area prior to the commencement of topsoil removal activities. To minimize potential negative impacts such as damage to nests and young individuals caused by topsoil removal, and the displacement of bird, reptile, amphibian, and mammal species due to dust and noise, irrigation will be carried out and visual inspections will be conducted in the sub-project area before topsoil removal activities begin. • Regular watering should be carried out to prevent dust formation. Noise should not exceed the limits set by the Ministry and the IFC and should remain within the standards set by the Ministry. Nighttime construction activities should be avoided unless necessary. • Ensure that efforts to remove species from the area are carried out gradually at the outset. Ensure that initial fieldwork is carried out gradually to allow wildlife species to disperse naturally from the area. • During soil stripping operations, if any vertebrate species are observed in the area during the breeding season, an investigation should be carried out by a team under the supervision of a vertebrate expert, and activities should commence only after transportation and relocation have been completed. During topsoil removal activities, if any vertebrate species are observed, especially during the breeding season, the area must be examined by a qualified team under the supervision of a vertebrate expert. Construction activities may only continue after the individuals have been safely relocated using appropriate methods.	management documents, as well as construction monitoring and reporting activities) KASKI (monitoring E&S performance and reporting to ILBANK)	
ESS8 - Cultural Heritage					
17.	Impacts on cultural heritage		• If archaeological remains are encountered during the construction works, the works will be stopped, and the relevant institutions will be contacted in accordance with the Chance Find Procedure in the ESMP. The Contractor shall immediately (within 24 hours) notify the Employer and ILBANK of such a finding. • Project employees, including contractor and subcontractor employees, will be trained on the Chance Find Procedure on the procedures to be followed in case of any findings.	Contractor (preparation of management plans and procedures, implementation of E&S requirements, and execution of construction activities) Supervision	Chance Find Procedure

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Relevant Plans/Procedures
			The relevant Preservation Board or Museum Directorate will be informed immediately, and the security of the area will be ensured by the Contractor. Construction work will not continue until official notification is received.	Consultant (audit and review of E&S management documents, as well as construction monitoring and reporting activities) KASKI (monitoring E&S performance and reporting to ILBANK)	
ESS10 - Stakeholder Engagement and Information Disclosure					
18.	Stakeholder Engagement and Information Disclosure	Local community	- Communities in the vicinity of the work area will be informed prior to commencement of works through consultation meetings, leaflets and information signage. - Construction sites and access roads will be separated from other areas with appropriate signboards, signs and fences to limit the staff and vehicle access to the other areas. - Information sharing and consultation activities will be carried out with communities and other stakeholders in line with the Stakeholder Engagement Plan (SEP). - Local culture and values of the project area will be taken into consideration in all phases of the sub-project and employees will be trained on codes of conduct.	Contractor (preparation of management plans and procedures, implementation of E&S requirements, and execution of construction activities) Supervision Consultant (audit and review of E&S management documents, as well as construction monitoring and reporting activities) KASKI (monitoring E&S performance and	SEP Grievance Mechanism

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Relevant Plans/Procedures
				reporting to ILBANK)	

4.3.Operation ESMP Matrix

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Implementation Plans
ESS2 - Labor and Working Conditions					
1.	General OHS Risks	PIU Employees Maintenance Personnel	- A complete risk assessment document addressing the Sub-project specific risks and defining mitigation measures will be prepared. - All employees of the PIU and contractor companies that will work during the operation period will receive the necessary OHS training covering the risks. - Personnel who have not been trained in OHS and are not aware of all risks will not be allowed to enter the work site. - All Sub-project management plans including safe work procedures and emergency action plans will be prepared. - Safety procedures and appropriate Personal Protective Equipment (PPE) will be used when working at height. - OHS Trainings will include the emergency procedures. - In case of any OHS incidents and/or accidents, the Contractor will immediately (within 24 hrs) inform ILBANK PMU and follow up with completing ESIRT forms, as instructed by ILBANK. This will include root cause analysis and corrective action plan.	KASKI	Risk Assessment document OHS Management Plan OHS Training Plan Emergency Preparedness and Response Plan
2.	OHS - Physical Hazards: Electrical Hazards	PIU Employees Maintenance Personnel	<u>General Measures</u> - Ensure that all energized electrical devices and lines are marked with warning signs - Ensure that the devices are locked (de-charging and leaving open with a controlled locking device) and labeled (warning sign placed on the lock) during service or maintenance. - Ensure that all electrical cords, cables, and hand power tools are checked for frayed or exposed cords. Also, ensure that the manufacturer's recommendations for the maximum permitted operating voltage of portable hand tools are followed - Ensure that all electrical equipment used in environments that are or may be wet is double insulated/grounded; use equipment with ground fault interrupter (GFI) protected circuits.	KASKI	Risk Assessment document OHS Management Plan OHS Training Plan Emergency Preparedness and Response Plan

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Implementation Plans
			• Ensure that power cords and extension cords are protected against damage from traffic by shielding or suspending above traffic areas • Ensure that high-voltage equipment and service rooms where access is controlled or prohibited are properly labeled ('electrical hazard'). • Ensure that "No Approach" zones are established around or under high voltage lines. • Ensure that construction vehicles or other vehicles with rubber tires that come into direct contact with or arc across high-voltage cables are taken out of service for 48 hours. • Ensure that all buried electrical cables are thoroughly identified and marked prior to any excavation work. <u>Site-specific Measures</u> • Relevant safety procedures will be established, and employees will be trained on these procedures to prevent the risk of electric shock and injury to employees during the installation of electrical equipment. • Safety fences will be constructed around electrical areas and no materials will be stored in or near these areas. • Contractor and subcontractor electricians will be well trained and those without a certificate of professional competence will not be employed in electrical work. • Electricians will be provided with suitably insulated Personal Protective Equipment (PPE) and work tools, and will be made aware of the risk of electric shock and protection techniques. • First aid workers trained in first aid in case of electric shocks will be employed by the PIU. • Work will not be carried out in rainy weather conditions. • Warning signs will be placed in areas with electrical hazards and all safety measures (e.g. hard barriers) will be implemented to prevent workers from being exposed to these areas.		

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Implementation Plans
			Toolbox talks will provide information about assembly work and electrical hazards and unqualified personnel will not be assigned to electrical work.		
3.	OHS - Physical Hazards: Ergonomics, Repetitive Motion, Manual Handling Lifting	Maintenance Personnel	<u>General Measures</u> - Ensure that mechanical assists are used to eliminate or reduce the effort required to lift materials, hold tools and work objects, and that more than one person is lifting if weights exceed thresholds - Ensure that tools are selected and designed that reduce force requirements and holding times and improve postures - Ensure that user-adjustable workstations are provided - Ensure that rest and stretch breaks are incorporated into work processes and job rotation is in place - Ensure quality control and maintenance programs are in place that reduce unnecessary forces and effort - Ensure that additional special circumstances, such as left-handed people, are considered <u>Site-specific Measures</u> - For manual handling and lifting, workers will be informed of the carrying capacities set out in the regulation and will be provided with the means to transport materials that are not suitable for manual handling. - Site workers will be provided with information and training on manual handling, including healthy lifting techniques. - Implementation of safe transportation techniques will be ensured. - Manual handling operations will be kept to a single level, ground conditions will be improved and environmental conditions will be enhanced. The ground will be kept clear of obstacles. - Appropriate Personal Protective Equipment (PPE) and safety equipment will be used.	KASKI	Risk Assessment document OHS Management Plan OHS Training Plan
ESS3 - Resource Efficiency and Pollution Prevention and Management					
	Wastewater and Ambient Water				

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Implementation Plans
	Quality				
4.	Wastewater generation and discharge during operation	Surface water resources	<u>General Measures</u> • Ensure water is used efficiently to reduce the amount of wastewater generation • Ensure that waste minimization and process modification, including reduction of the use of hazardous substances, is carried out to reduce the load of pollutants requiring treatment. • Septic system constructed for construction phase will be used for wastewater disposal and treatment, ensure that the following requirements are met: ○ Properly designed and installed in accordance with local regulations and guidance to prevent any hazard to public health or contamination of land, surface or groundwater. ○ Well maintained to allow effective operation. ○ Installed in areas with sufficient soil percolation for the design wastewater loading rate. ○ Installed in areas of stable soils that are nearly level, well drained, and permeable, with enough separation between the drain field and the groundwater table or other receiving waters. <u>Site-specific Measures</u> • Domestic wastewater generated in the subproject area will be collected in sealed septic tank constructed for construction phase. • KASKI's vacuum trucks will regularly transfer the wastewater to the WWTP. Kayseri Wastewater Treatment Plant located 50 km from the subproject area will be used to treat all wastewater generated. • No uncontrolled wastewater discharge will be allowed during the subproject lifetime.	KASKI	
	Waste Management				
5.	Waste generation during operation	Local communities Flora & Fauna	<u>General Measures</u>	KASKI	

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Implementation Plans
			- Establish waste management priorities at the outset of activities based on an understanding of potential Environmental, Health, and Safety (EHS) risks and impacts and considering waste generation and its consequences - Ensure that a waste management hierarchy is established that considers prevention, reduction, reuse, recovery, recycling, removal and finally disposal of waste - Ensure that waste segregation and storage in temporary waste storage areas is managed according to the standards set out in the GIIP and relevant legislation - Ensure that waste is classified and labeled according to waste codes. - Ensure that data and information is collected on waste streams generated under the project, including characterization of waste streams by type, quantity and potential use/disposal. - Ensure that raw materials or inputs are substituted with less hazardous or toxic materials or with materials for which processing produces lower waste volumes. - Ensure that good housekeeping and operational practices, including inventory control, are established to reduce the amount of waste from materials that are outdated, out-of-specification, contaminated, damaged or in excess of facility needs - Ensure that the generation of hazardous waste is minimized by implementing strict waste segregation to avoid mixing of non-hazardous and hazardous waste to be managed <u>Site-specific Measures</u> - A covered temporary waste storage area that will not be affected by weather conditions will be established outside the sub-project area (in an area to be determined by KASKI) in an area owned by KASKI for the accumulation of wastes under appropriate conditions.		

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Implementation Plans
			- Personnel responsible for the temporary waste storage area will be assigned and identification signs will be posted indicating the types of waste to be generated and the responsible personnel. - All waste generated during the operation phase will be sorted and labeled according to type and class and stored in the temporary waste storage area. - KASKI will have waste protocols with licensed recycling and disposal companies. - All waste will be included in the recycling and disposal process through licensed recycling companies within the period specified in the regulations for waste types. - Separate sections will be created in the temporary waste storage area for different waste types and measures will be taken to prevent hazardous wastes from reacting. - Fire risk and precautions will be taken into consideration in the temporary waste storage area and fire extinguishing equipment will be kept in accessible locations. - All waste generated during the subproject will be recycled or disposed of and no waste will be buried, incinerated or disposed of uncontrolled. - Domestic waste generated during the operation phase will be collected and disposed of by waste collection vehicles belonging to the Melikgazi municipality		
ESS4 - Community Health and Safety					
6.	Sexual Exploitation and Abuse (SEA)/Sexual Exploitation/ Sexual Harassment (SE/SH)	Local Communities	- All project staff will be trained on Code of Conduct at induction to minimize the impact of cultural differences. - Project staff will be trained on SEA/SH and CoC and those involved in sexual exploitation will have their employment contracts terminated. - It will be mandatory for project employees to sign the CoC. - Women's complaints of sexual abuse will be handled confidentially.	KASKI	Stakeholder Engagement Plan GM

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Implementation Plans
			The content of E&S trainings to be provided to project employees will include Sexual Exploitation and Sexual Harassment		
7.	Risks of unauthorized access of community members, especially children, to the subproject site	Local Communities	- The subproject site will be fenced to prevent unauthorized access and ensure security. - The subproject site will be monitored 24 hours a day with security cameras and in case of security problems, the personnel in charge will intervene in case of violations. - Guards who will perform their duties unarmed will receive training on public health safety and behavioral rules. - Children will be prevented from crossing the fence and entering the subproject area by security cameras. Unauthorized entries will be intervened immediately. - Physical security checks will be carried out at regular intervals to prevent damage to the fence and security problems. - Consultation meetings will be held in the nearest settlement, Ağırnas neighborhood, and local communities will be informed, especially about children not entering the sub-project area and the danger of electricity.	KASKI	Stakeholder Engagement Plan
8.	Grievance Mechanism	Local Communities PIU Employees	- As indicated in the Roles and Responsibilities table; KASKI will establish a Grievance Mechanism for the project and ensure its effective operation throughout the life cycle of the project with ILBANK. - SEP to be updated annually and if there are significant changes in the Project. - The implementation of the Stakeholder Engagement Plan (SEP) and Grievance Mechanism will be the responsibility of KASKI PIU. - Visibility of the SEP and Grievance Mechanism will be ensured, including contact details of staff responsible for grievance handling. - In order to increase the accessibility of the complaint mechanism and the visibility of the project, posters and brochures will be prepared and distributed to all residents of the Ağırnas neighborhood and employees of nearby livestock farms.	KASKI	Stakeholder Engagement Plan GM

No	Impact Description	Receptor	Proposed Mitigation Measure	Responsible Parties	Implementation Plans
			All records received through the grievance mechanism and other channels will be recorded in a grievance log for the duration of the project.		
ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources					
9.	Natural habitats	Flora and Fauna Species Birds, Reptiles - Frogs and Mammals	- During operations, animals identified in the sub-project area will be safely removed from the sub-project site. - Pesticides will not be used in plant control.	KASKI	-
ESS10 - Stakeholder Engagement and Information Disclosure					
10.	Stakeholder Engagement and Disclosure	Local community	Interaction / communication will be established with communities, and adequate timing will be planned for engagement activities. Additionally, regular consultations will be carried out with the authorities and communities regarding the project management.	KASKI	Stakeholder Engagement Plan SEP

4.4. Monitoring and Reporting

The Sub-borrower will conduct internal monitoring of Sub-project's E&S performance and submit Periodic Monitoring Reports to ILBANK in line with the sub-financing agreement requirements. The information to be provided as part of reporting for the respective monitoring period will include the following:

- Up-to-date information on sub-project construction progress, work plan and adequate technical staff,
- The status of compliance with legal requirements, permits required and the outcome of inspections by national authorities and the status of fines imposed by national authorities,
- Details of how the requirements of the IFI standards (e.g. WB ESSs) are being met on the basis of compliance with Sub-project level Environmental and Social Action Plans (ESAPs),
- Incident and accident reports and statistics,
- Current Sub-project level E&S organization and capacity (including information on capacity building and training),
- Progress with Sub-project level stakeholder engagement activities and management of grievances, and
- Records on E&S non-conformities identified and general status of Corrective Action Plan implementation at Sub-project level (in case of non-conformities).

Key performance indicators (KPIs) of this procedure will be monitored, verified, and evaluated within the scope of the Sub-project monitoring stage. The KPIs for both construction and operation phases of the Sub-project are presented in Table 15.

Table 15. Key Performance Indicators for Both Construction and Operation Phases of the Sub-project

Monitoring Focus	KPI
Documentation	
Following ESMP Project specific plans will be developed and be in place.	Full compliance with Sub-project's ESMP
Air Quality	
Non-Compliance with air quality standards	Zero grievances per year
Community grievances	Minimization and continued improvement in the number of air quality related community grievances
Violation on speed limit	Minimization and continued improvement in the number of reported violations on speed limit
Noise	
Noise and Vibration incidents	Minimize and continued improvement in number of reported noise and vibration related incidents
Non-Compliance with Project standards	Zero Non-Compliance Reports (NCRs) per year
Number of noise-related community grievances	Zero grievances per year
Community grievances	Minimization and continued improvement in the number of noise related community grievances
Water / Wastewater	
Spill incident	Minimization and continued improvement in the number of the reported water quality related incidents.
Non-Compliance with Sub-project standards	Zero NCRs per year

Monitoring Focus	KPI
Wastewater collection system	Zero grievances per year
Waste	
Waste Generation	Minimization of total waste generated Decrease in the ratio of hazardous waste generated to total waste (by contamination + by generation)
Waste Disposal	Increase in the ratio of recovered/reused/recycled waste to total waste generated
Soil Quality	
Spill incident	Minimization and continued improvement in the number of the reported soil quality related incidents
Non-Compliance with Sub-project standards	Zero NCRs per year
Soil quality accidents	Zero accident per year
Number of soil-related community grievances	Zero grievances per year
Traffic	
Number of non-compliances against the mitigation controls identified in Traffic and Transport Management Plan	Decreasing number/ continuous improvement in number of reported non-compliances
Number of drivers found to be exceeding speed limits or driving unsafely	Zero exceedance per year
Number of road traffic accidents involving: Accidental injuries and deaths, Spillages (such as cargo or fuel), Wildlife-vehicle collisions.	Zero accidents per year
Number of traffic-related grievances	Zero grievances per year
Health, Safety and Environment	
% of scheduled HSE Inspection	>90
% of attendance at HSE meetings	>90
% of closing of NCRs	100
Reporting safe observations	100%
Reporting unsafe observations	100%
Reporting near misses	100%
Reporting number of incidents	100%
Reporting number of accidents	100%
Reporting day-loss	100%
% of Toolbox attending	>90
% of Risk Assessment compliance	>90
% of Legal Requirements compliance	100%
Results of scheduled audits	>85
HSE training carried out to training matrix. > 90% of all training to matrix	>90
% of attendance at scheduled trainings	>90
Engagement in HSE program by individual managers and supervisors	>90
Engagement in HSE program by contractor's	>90
Labor and Working Conditions	
Number of worker grievances closed out within the target timeframe	100% compliance with labor laws and regulations Zero unresolved health and safety incidents within the target timeframe 100% availability of required PPE

Monitoring Focus	KPI
	90% or higher worker satisfaction rate
Community Health and Safety	
Number of communicable and non-communicable diseases and injuries.	Negative Trend/No significant increase in communicable and non-communicable disease and injury rates per 1,000 residents per annum.
Number of community health safety & security grievances from local communities as recorded in the grievance management system.	Decreasing number/ continuous improvement in number of grievances
Number of reported community health & safety incidents	Zero incidents per year
Number of reported air quality or noise incidents	Zero incidents per year
Direct and indirect threats posed by construction activities against traffic and pedestrians	Zero number of drivers found to be exceeding speed limits or driving unsafely. Zero accidental injuries and deaths, Zero traffic-related grievances
Access to the Construction Site - Security Fence/ Protection Tape	Zero Number of unauthorized accesses to the Sub-project area
Trainings	
Training records	Trainings on ESMP and SEP documents. Providing all trainings (including GM, GBV, SEA/SH) to all employees. 100% of scheduled training sessions conducted. 80% or higher participant satisfaction rate Zero participants without completion certificates if applicable
Disclosure	
Grievance Records, Disclosure meeting participant records, ESMP, SEP, GM will be disclosed at Project web site in two languages. (English and Turkish).	All grievances closed-out within the target timeframe ESMP, Project specific SEP and GM will be prepared and disclosed at the Project web site
Grievance mechanism	
Grievance Records, GM disclosure	All grievances closed-out within the target timeframe. GM disclosure to the PAPs, stakeholders GM disclosure at Sub-project web site
Cultural Heritage	
Existence of a Chance Find	Zero Grievance Records

Table 16. Construction Environmental and Social Monitoring Table

Ref.	Subject	Parameter to be Monitored	Monitoring Location	Monitoring Method	Monitoring Frequency	Reference / Threshold Level (if applicable)	Responsibility for Monitoring	Monitoring/Key Performance Indicators (KPIs)	Cost (If not included in the Sub-project Budget)
C 1	Working Conditions General OHS Risks Lifting Risks Electric Shock Risks Fire Risks Manual Handling Risks	Use of PPE OHS Trainings Number of OHS non-compliances	Subproject Area	OHS Checklist OHS Training Records Fire Extinguishing System Records Daily field visual observations Accident records Near-miss records Grievance records Monthly report	Daily visual observations Monthly report	National OHS Legislation WB ESS 2	KASKI Supervision Consultant Contractor	% of Planned OHS Audits % of participation in OHS meetings Rate of closure of Non-Compliance Reports (NCR) % Reporting of safe and unsafe observations % of toolbox participation Results of audits OHS trainings conducted according to the training matrix Number of closed corrective actions	Included in the Subproject Cost
C 2	Waste management Waste Storage Area Waste management practices	Adequate waste storage conditions Spills	Temporary Waste Storage Area	Visual observations Waste records Record of Spills	Daily visual observations Monthly document record control Monthly report	Waste Management Regulation WB ESS 3 GIIP	KASKI Supervision Consultant Contractor	Amount of waste stored Amount of waste disposed	Included in the Subproject Cost

Ref.	Subject	Parameter to be Monitored	Monitoring Location	Monitoring Method	Monitoring Frequency	Reference / Threshold Level (if applicable)	Responsibility for Monitoring	Monitoring/Key Performance Indicators (KPIs)	Cost (If not included in the Sub-project Budget)
C 3	Dust from construction activities and vehicle traffic	Grievances related to dust and emissions	Sub Project Site Subproject surroundings	Grievance records Visual observations	Daily visual observations Monthly report	WB ESS 3 National Legislation GIIP	KASKI Supervision Consultant Contractor	Number of grievances received Number of grievances closed Number of open grievances	Included in the Subproject Cost
C 4	Wastewater Pollution	Wastewater	Septic Tanks	Wastewater receipts (sewerage septic tank receipt)	Monthly report	Regulation on Urban Waste Water Treatment WB ESS 3	KASKI Supervision Consultant Contractor	Amount of treated wastewater	Included in the Subproject Cost
C 5	Noise Pollution	Grievances related to disturbances caused by noise	Sub Project Site Subproject surroundings	Grievance records Noise measurement results in case of grievances	Monthly report	Environmental Noise Control Regulation GIIP WB ESS 3	KASKI Supervision Consultant Contractor	Number of grievances received	Included in the Subproject Cost
C 6	Traffic risks	Damage to roads Emergency records Traffic accident records	Sub Project Site Subproject surroundings	Grievance records	Daily visual observations Monthly report	Traffic management plan Emergency Response Plan WB ESS 4	KASKI Supervision Consultant Contractor	Number of grievances received	Included in the Subproject Cost
C 7	Sexual Exploitation and Abuse (SEA)/ /Sexual Exploitation/ Sexual Harassment (SE/SH)	Employee code of conduct Grievance mechanism	Sub Project Site Subproject surroundings	Review of grievance records Code of Conduct Training Plan to include SEA and SE/SH topics	Daily report	WB ESS 2 WB ESS 4 Sub management Plan	KASKI Supervision Consultant Contractor	Number of grievances received Grievance Mechanism	Included in the Subproject Cost

Ref.	Subject	Parameter to be Monitored	Monitoring Location	Monitoring Method	Monitoring Frequency	Reference / Threshold Level (if applicable)	Responsibility for Monitoring	Monitoring/Key Performance Indicators (KPIs)	Cost (If not included in the Sub-project Budget)
				Visual observations Meetings with Muhtars in the Area of Impact					
C 8	Cultural Heritage	Chance Finds	Sub Project Site	Chance Find Procedure	Daily visual observations Monthly report	WB ESS 8 Sub management Plan	KASKI Supervision Consultant Contractor	Number of Chance Finds	Included in the Subproject Cost

Table 17. Operation Environmental and Social Monitoring Table

Ref.	Subject	Parameter to be Monitored	Monitoring Location	Monitoring Method	Monitoring Frequency	Reference / Threshold Level (if applicable)	Responsibility for Monitoring	Monitoring/Key Performance Indicators (KPIs)	Cost (If not included in the Sub-project Budget)
O 1	Working Conditions General OHS Risks Lifting Risks Electric Shock Risks Fire Risks Manual Handling Risks	Use of PPE OHS Trainings OHS Non Compliances	Subproject Area	OHS Checklist OHS Training Records Fire Extinguishing System Records Daily field visual observations Accident records Near-miss records Grievance records	Daily site visual observations Monthly report	National OHS Legislation WB ESS 2	KASKI	% of Planned OHS Audits % of participation in OHS meetings Reporting of safe and unsafe observations % of toolbox participation Number of closed corrective actions	Included in the Operating Cost

Ref.	Subject	Parameter to be Monitored	Monitoring Location	Monitoring Method	Monitoring Frequency	Reference / Threshold Level (if applicable)	Responsibility for Monitoring	Monitoring/Key Performance Indicators (KPIs)	Cost (If not included in the Sub-project Budget)
				Monthly report				Results of audits OHS trainings	
O 2	Waste management Waste Storage Area Waste management practices	Adequate waste storage conditions	Temporary Waste Storage Area	Visual observations Waste records	Daily visual observations Monthly report	Waste Management Regulation WB ESS 3 GIIP	KASKI	Amount of waste stored Amount of waste disposed	Included in the Operating Cost
O 3	Sexual Exploitation and Abuse (SEA)/ /Sexual Exploitation/ Sexual Harassment (SE/SH)	Employee code of conduct Grievance mechanism	Sub Project Site Subproject surroundings	Review of grievance records Code of Conduct Training Visual observations	Daily report	WB ESS 2 WB ESS 4 Sub management Plan	KASKI	Number of grievances received Grievance Mechanism	Included in the Operating Cost

4.5. List of Associated Plans and Procedures

The E&S management plans and procedures to be prepared by Contractor/s are listed in Table 18.

Table 18 . Plans and Procedures Associated

Management Plan or Procedure	Relevant Sub-project Phase (Construction only, Operation only, both Construction and Defect Liability Period (DLP))
Waste Management Plan	Construction
Traffic and Safety Management Plan	Construction/Operation
Community Health, Safety and Security Plan	Construction/Operation
Workforce Management Plan	Construction
Occupational Health and Safety Management Plan	Construction/Operation
Emergency Response and Action Plan	Construction/Operation
Stakeholder Engagement Management Plan and Grievance Mechanism	Construction/Operation
Chance Find Procedure	Construction

The plans/procedures will be reviewed and revised in any major change and/or at least every 6 months.

4.6. Management of Change

Sub-borrower shall notify ILBANK of material changes in Sub-project (including those that stem from Sub-borrower and/or contractor activities) using ILBANK's Change Notification Form template (Annex I). Such changes may include, inter alia, the following:

- Administrative/ organizational structure changes at the decision-making level
- Changes in assigned environmental, social and/or OHS staff
- Legislative changes impacting Sub-project implementation (e.g. new permitting processes).
- Design changes (e.g. any changes in the Sub-project description, footprint such as new temporary or permanent sites/facilities – on-site or off-site, changes in number of workforce involved, changes in on-site/off-site worker accommodation arrangements).
- Schedule changes.
- Changes related to E&S issues (e.g. new biodiversity features or cultural heritage assets identified, additional resettlement need, etc.)

Contractor or construction supervision consultants' changes at any phase of the Sub-project requiring (i) E&S commitments and E&S roles and responsibilities to be clarified with the new contractor or supervision consulting firm, and (ii) contractor E&S training to be reorganized and redelivered to new contractor or supervision consulting firm's staff.

5. CAPACITY DEVELOPMENT AND TRAINING

5.1. Organizational Capacity

The organization structure of the PIU to be established by the Sub-borrower is presented in Figure 16 The PIU will have qualified staff and resources to the satisfaction of ILBANK.

Figure 16 . Organization Structure – Project Implementation Unit (PIU)

Project Implementation Unit Personnel List	
Contract Management	
Deputy General Manager	
Procurement Unit	
Branch Manager	
Construction Technician	
Technical Management	
Department Head	
Technical Unit	
Branch Manager - Civil Engineer	
Civil Engineer	
Civil Engineer	
Electrical Technician	
Electrical - Electronics Engineer	
Mechanical Engineer	
Mapping Technician	
Financial Management	
Branch Manager	
Financial Unit	
Officer	
Monitoring and Evaluation	
Civil Engineer	
OHS	
Occupational Health and Safety and Civil Defense Branch Manager	
Social Specialist	
Social Specialist/Sociologist	
Environmental Specialist	
Environmental Engineer	

The Sub-borrower will maintain the PIU by ensuring that there is qualified staff assigned and serving on the duty throughout the sub-financing agreement life cycle.

At minimum, the E&S team at the Sub-borrower PIU will include the following personnel who shall support management and monitoring of Sub-project E&S risks and impacts and ensure full compliance with the ESMP and other relevant E&S instruments:

- **Environmental Specialist(s):** to address environmental risks and impacts identified under the Environmental and Social Assessment (ESA) reports, such as Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP), etc.
- **Social Expert/ Grievance Mechanism (GM) Focal Point:** to address social risks and impacts under the ESA reports, land acquisition, and labor issues, including stakeholder engagement and grievance redress; and
- **Occupational Health and Safety (OHS) Specialist(s):** to address OHS risks and impacts within the scope of ESIA and ESMP management plans and national regulations.

If the necessary staff is not available within its own organizational structure, the Sub-borrower shall receive support/ consultancy services from outside.

Contractors

The Sub-borrower will require awarded contractors to establish and maintain throughout the contract duration an organizational structure with qualified staff and resources.

This will be achieved through assigning the following personnel under the contractor's organization:

- Environmental Specialist(s)
- Social Specialist(s) who will also act as the GM Focal Point
- Occupational Health and Safety (OHS) Specialist(s)

If the necessary staff is not available within its own organizational structure, contractors shall receive third-party support/ consultancy services.

5.2.Roles and Responsibilities

The roles and E&S related responsibilities of the Sub-borrower and other key parties are described in Table 19.

Table 19 . Roles and E&S related Responsibilities of Key Parties associated with ESMP Implementation

Party	Role	Key Responsibilities
Financial Intermediary		
ILBANK	FI	- To fulfill the Sub-project implementation support role to ensure that is carried out in line with ILBANK ESMS and WB ESF, - Visit Sub-project site/s on occasion, and as required, as part of Sub-project supervision, monitoring and auditing. - Reviewing, approving, and disclosing ESMP on ILBANK's official website. - Reviewing the Environmental and Social Monitoring Reports (ESMRs) which will be prepared by the Sub-borrower.
Sub-borrower		
Kayseri Water and Sewerage Directorate (KASKİ)	Sub-borrower Management	- Hold ultimate responsibility for the E&S performance of the Sub-project to the satisfaction of the ILBANK, including the performance of Sub-project contractors throughout the sub-financing agreement life cycle. - Establish Project Implementation Unit (PIU) following the execution of sub-financing agreements to carry out operational and administrative tasks to oversee the implementation of the E&S instruments and monitoring progress; allocate resources for the recruitment of in-house environmental, social and OHS staff under the PIU - Ensure that ESMP, SEP and other E&S management plans and procedures required by ILBANK is prepared within the timeframes agreed with ILBANK and allocate adequate financial and human resources – either from the Sub-borrower's own resources or from the Sub-project loan and implement. - Cooperate with the ILBANK representatives to discuss and agree on the ESAP and other E&S covenants for incorporation into sub-financing agreements to be executed between the ILBANK and the Sub-borrower (with support from RD E&S team as necessary) - Ensure that EHSS requirements of ILBANK are incorporated into relevant contractor tender and agreement documents to be prepared in collaboration with the construction supervision consultant - Hold and use the authority and responsibility to stop any Sub-project related work activity if it poses an imminent danger to health, safety, or the environment. - Allocate resource to ensure monitoring of Sub-project E&S performance and reporting to ILBANK at IFI standards in line with the sub-financing agreement conditions - Facilitate monitoring visits and audits by ILBANK and their consultants - Notify the ILBANK RD – E&S Teams of any significant E&S incident or accident within maximum 24 hours of the accident/incident; contractually require the supervision consultants and/or contractors to promptly report such incident and accidents (timeframe to be defined by ILBANK) (Annex F) - Prepare and submit a detailed E&S Incident Investigation Form, supplemented by an RCA to be conducted pursuant to GIIPs, to ILBANK within 15 days of the accident/incident date for significant accidents or incidents (in line with the template presented in the E&S Supervision, Monitoring and Reporting Procedure). The investigation will be supplemented by a Root Cause Analysis (RCA) (Hata! Başvuru kaynağı bulunamadı.).
	E&S Team - Environmental staff - Social staff - OHS staff	- Participate in the training to be organized by ILBANK as part of ILBANK ESMS Training Procedure implementation. - Ensure that satisfactory ESMP, SEP and as required other E&S assessment documentation required by ILBANK is prepared by qualified independent specialists and submitted to ILBANK for appraisal and credit decision-making for Moderate risk Sub-project where the Sub-borrower has limited E&S capabilities, coordinate commissioning independent third-party specialists (such as external E&S consultancy companies, individual consultants) to carry out the E&S

Party	Role	Key Responsibilities
		assessment and prepare the E&S documentation required for ILBANK's appraisal and credit decision-making processes • Provide ILBANK with relevant adequate information to undertake the E&S due diligence in accordance with the ESMS (e.g. duly completed Sub-borrower questionnaire and supporting documentation to be requested by ILBANK in accordance with the E&S Screening and Risk Classification and ESDD procedures) • Support the Sub-borrower management as required in the review and evaluation of ESAP and other E&S covenants for incorporation into sub-financing agreements to be executed between the ILBANK and the Sub-borrower • Ensure compliance of Sub-project operations (including contractor activities on site) with national legislation and E&S requirements of the lending IFIs as included in the sub-financing agreements, ESAP and Sub-project-specific E&S documentation (such as ESMP, SEP and other E&S management plans and procedures required by ILBANK) • Undertake monitoring of Sub-project E&S performance and reporting to ILBANK at IFI standards in line with the sub-financing agreement conditions • Ensure implementation of corrective actions in case of E&S non-compliances in coordination and agreement with ILBANK DG and RD E&S teams over reasonable timeframes • Coordinate the construction supervision consultants, contractors and/or external E&S consultants for collection of the monitoring data and compilation of or providing input to periodic monitoring reports as necessary and appropriate • Allow ILBANK representatives (including individual consultants) to access Sub-project facilities and records.
Construction Supervision Consultants	Management and E&S staff	Carry out the following tasks on behalf of the Sub-borrowers: • Participate in the training sessions to be organized by Sub-borrowers in line with the requirements of ILBANK ESMS Training Procedure • Supervise the construction works of contractors on-site, including implementation of Sub-project-specific E&S requirements (requirements stemming from ESMP, SEP and other E&S management plans and procedures required by ILBANK as applicable) by contractors on a daily basis • Ensure sufficient E&S capacity for implementation of E&S requirements as set out in the sub-financing agreements between the Sub-borrower and ILBANK • Support the Sub-borrowers for the supervision and review of E&S management documentation prepared by construction contractors and submit them to Sub-borrowers upon finalization • Review monthly self-monitoring reports prepared by the construction contractors for early identification of E&S issues and/or non-compliances and submit them to municipalities/municipal utilities upon finalization • Identify E&S non-compliances on site and enforce construction contractors to undertake corrective actions within defined and agreed timeframes • Support the Sub-borrowers (as requested) in the preparation of periodic E&S monitoring reports to be submitted to ILBANK in line with the ILBANK E&S Supervision, Monitoring and Reporting Procedure • Notify the Sub-borrower of any significant E&S incident or accident that have taken place in Sub-project related operations within 24 hours.
Construction Contractor	Management and E&S staff	• Ensure sufficient E&S capacity for implementation of E&S requirements as set out in the construction contracts • Participate in the training sessions to be organized by Sub-borrowers in line with the requirements of ILBANK ESMS Training Procedure • Prepare Sub-project-specific E&S management plans and procedures prior to start of construction works as required by the construction contracts • Comply with the requirements of national legislation and implement the E&S requirements as set out in the sub-financing agreements (executed between ILBANK and the Sub-borrowers) and construction contracts • Submit periodic (in frequencies to be set by ESAP) E&S self-monitoring reports to the municipalities/municipal utilities through construction supervision consultants ("müşavir") – in line with the format provided by ILBANK.

Party	Role	Key Responsibilities
		• Fill in monthly occupational health and safety (OHS) forms – reviewed by construction supervision consultants. • Implement corrective actions in case of E&S non-compliances under the supervision of Sub-borrower's construction supervision consultant • Promptly notify the Sub-borrower of any significant E&S incident or accident that have taken place in Sub-project related operations (ILBANK no later than 24 hours)

5.3.Capacity Building and Training

Sub-borrower staff (trained by ILBANK) will deliver E&S training to contractors. Training contents are summarized in Table 20. Sub-borrower will identify specific training to be conducted in line with these modules and submit this to ILBANK prior to commencement of works.

Sub-borrower will ensure that E&S training programs are expanded to subcontractors by contractors in case their involvement in Sub-project implementation.

Table 20. Training Components for Training of Contractor Staff

Module	Training Name	Training Duration	Key Training Content
Module 1	ILBANK E&S Requirements	1 hour	- Overview of ILBANK E&S requirements: - o ILBANK E&S Policy (including but not limited to the guiding principles on human rights, labor rights and working conditions, community health, safety and well-being, cultural heritage, gender equality, etc.) - o External Communications (including stakeholder engagement, grievance management, etc.) - o Monitoring, Review and Reporting - o Labor Management, Contractor Management - ILBANK Code of Conduct
Module 2	Sub-project-level E&S Requirements for contractors as per sub-financing agreement conditions	3 hours	- Sub-project specific requirements: - o E&S covenants included in sub-loan agreements - o Sub-project ESAP requirements - o Sub-project-level E&S assessment and management documentation (such as ESMP, SEP and other E&S management plans and procedures as applicable); - o E&S sub-management plans training - o Emergency Preparedness and Response Plan including a training program for emergency responders including drills at regular intervals; - o Specific training (e.g. special trainings-certificates for workers in electrical work and training on appropriate behavior towards workers and affected communities). - Preparation and implementation of Labor Management Plans.

Training will be provided immediately following the recruitment process and will be refreshed every six months throughout the employment period and will be conducted at various levels. Training will cover employee rights, contractual requirements, Emergencies, Code of Conduct, grievance mechanism and communication channels. Awareness and compliance with rules on gender-based violence, sexual harassment, sexual exploitation, and abuse to be provided in trainings will be included in employee contracts. Trainings can be conducted by external experts or with internal expertise of the PIU and consultants as well as support from ILBANK and WB. Long-term trainings will address specific environmental and social issues and provide possible solutions to the PIU.

The PIU is also responsible for monitoring the Contractor's training related activities. Trainings will be provided after the signing of the work contracts and refresher trainings will be conducted as necessary according to the progress of the work and construction activities. At the end of the training, assessment and evaluation should be carried out to measure the effectiveness of the training and the level of knowledge and competence of the participants. According to the evaluation results, the training program may be changed, the trainers may be changed, or the training may be repeated.

Planned Key Trainings include (but are not limited to):

- o ESMP
- o Waste Management,

- Energy Efficiency,
- Safe Driving,
- Occupational Health and Safety,
- Chance Find Procedure,
- Orientation on Code of Conduct, GBV and CSI/CT, Grievance Mechanism, Environment, Health and Safety and WB Requirements, and
- First Aid and Emergency Preparedness Trainings

6. IMPLEMENTATION SCHEDULE AND COST ESTIMATES

6.1. Implementation Schedule

Duration of the construction and operation phase activities are listed in Table 21.

Table 21. Duration of Activities

Phase	Remarks/ Notes
Construction Duration (from site mobilization until provisional acceptance)	6 months
Defect Liability Period	12 months
Operation Duration	25 years

6.2. Cost Estimates

All costs related to the implementation of the ESMP are included in the subproject budget.

Estimated sources for budget allocation are listed in Table 22.

Table 22. Estimated Budget Requirement for ESMP Implementation

Cost items	Party	Estimated cost (EURO)
PIU E&S Staff	KASKI	50.000
Training of Construction Workforce	Included in the subproject budget	20.000
Health and Safety training and equipment	Included in the subproject budget	25.000
Complaint Based Measurements and Surveys	Included in the subproject budget	10.000
Accidental Spill and Leakage Management	Included in the subproject budget	10.000
Regular Maintenance of E&S Systems and Implementation of ESMP/ E&S Tools	Included in the subproject budget	10.000
Operation phase staff & OHS System	KASKI	50.000
Total		175.000

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Annex A - Form regarding the consultation meeting with the unofficial user



İSTİŞARE FORMU

İstisare Konusu	402/14 parsel numaralı arazi de yürütülen tarım faaliyetinin, mülkiyeti KASKI'ye ait olan 402/9 parsel numaralı arazi de yapılacak olan Ağırnas Güneş Enerjisi Santralinden etkilenip etkilenmeyeceği.		
İstisare Yeri			
Tarih ve Saat	03/09/2025	Hazırlayan	

Konu	Tartışılan Konular/Alınan Kararlar
	Ağırnas Güneş Enerjisi Santrali'nin yapılacağı alanın bir kısmının komşu parselde tarım faaliyeti gösteren çiftçi tarafından ekilmesi sebebi ile tarım faaliyeti yapan çiftçi ile görüşme gerçekleştirilmiştir. Projenin bu kişinin tarım faaliyetini etkileyip etkilemeyeceği kendisi ile istisare edilmiştir. Bu yapılan istisarede 402/14 parsel numaralı arazi de tarım faaliyeti yapan ve başka bir geçim kaynağının ve ekonomik faaliyetinin tarım olduğunu belirten [] proje sınırının çevrili olmanından dolayı yanlışlıkla proje alanına girip girmesini belirtmiş olup hasat dönemi sonlanmış olmasıyla yeni yapılacak ekim döneminde belirtilen proje sınırını girmeyecek sınır belirtmiştir. Başka alanlarında tarım faaliyeti gösterdiği ve tek geçim kaynağının bu arazi olduğunu, tarım bu durumun kendisini etkilemeyeceğini ifade etmiştir.

İstisare Görüşmesi Katılımcıları

Ad-Soyad	Kurum	Unvan	İmza
	Çiftçi		
	BAY KASKI	Mahine Müh.	
	KASKI	Elektrik Tek.	

Annex B - Existing Permitting Documentation

- B-1 EIA Decision
- B-2 Non-Agricultural Use Opinion
- B-3 Kayseri Metropolitan Municipality Decision
- B-4 DSİ Opinion
- B-5 DHM Opinion
- B-6 Opinion Letters or Official Correspondence with Authoritative Bodies (e.g., Cultural Heritage Authorities, etc.)
- B-7 Opinion of the Ministry of Environment, Urbanization and Climate Change
- B-8 Opinion of the Ministry of Agriculture and Forestry
- B-9 Opinion of the Cultural Heritage Preservation Board
- B-10 Ağırnas Title Deed
- B-11 Opinion of the General Directorate of Highways
- B-12 KCETAŞ Opinion Letter

Official correspondence and permissions mentioned in Annex B are not attached to the ESMP but presented separately.

Annex C - Title Deed

BU BELGE TOPLAM 2 SAYFADAN OLUŞMAKTADIR BİLGİ AMAÇLIDIR.



Tarih: 10-1-2023-16:55



Tapu Kaydı (Aktif Malikler için Detaylı - ŞBİ var)

TAPU KAYIT BİLGİSİ

Zemin Tipi:	AnaTasınmaz	Ada/Parsel:	402/9
Taşınmaz Kimlik No:	95763592	AT Yüzölçümü(m2):	40408.26
İl/İlçe:	KAYSERİ/MELİKGAZİ	Bağımsız Bölüm Nitelik:	
Kurum Adı:	Melikgazi	Bağımsız Bölüm Brüt Yüzölçümü:	
Mahalle/Köy Adı:	AĞIRNAS Mah.	Bağımsız Bölüm Net Yüzölçümü:	
Mevkii:	MEĞERZEK	Blok/Kat/Giriş/BBNo:	
Cilt/Sayfa No:	75/7362	Arsa Pay/Payda:	
Kayıt Durum:	Aktif	Ana Taşınmaz Nitelik:	SU DEPOSU VE ARSASI

TAŞINMAZA AİT ŞERH BEYAN İRTİFAK BİLGİLERİ

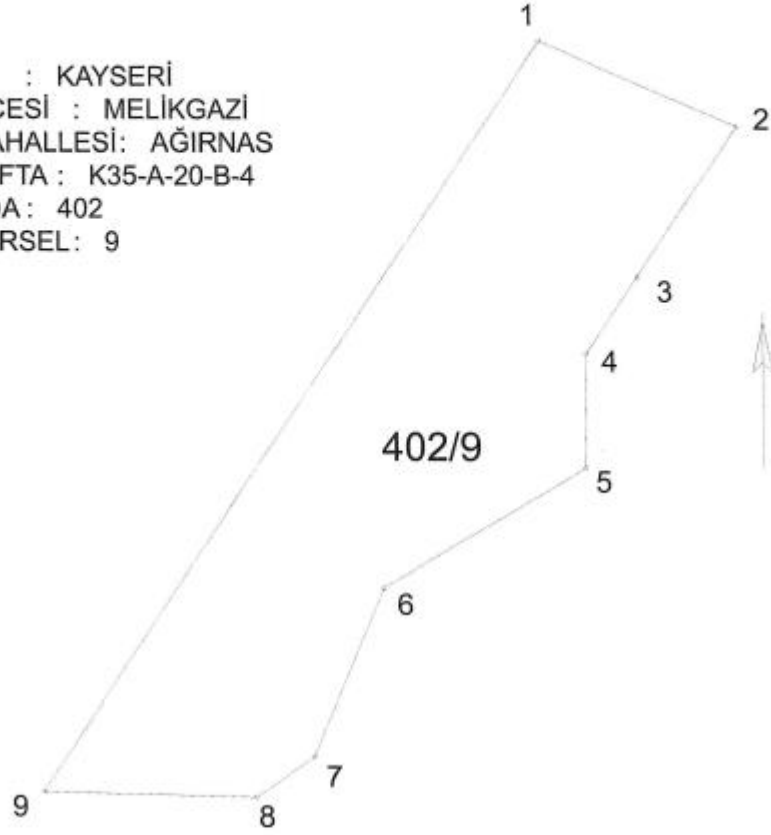
Ş/B/İ	Açıklama	Malik/Lehtar	Tesis Kurum Tarih-Yevmiye	Terkin Sebebi-Tarih-Yevmiye
Beyan	Diğer (Konusu: DEVLET SU İŞLERİ GENEL MÜDÜRLÜĞÜ 12. BÖLGE MÜDÜRLÜĞÜNÜN 25/03/2021 TARİH VE E-1099111 SAYILI YAZISINA İSTİNADEN "3083 sayılı Kanunun 6. Maddesi gereğince kısıtlıdır") Tarih: - Sayı: -(Şablon: Diğer)	(SN:6194522) DEVLET SU İŞLERİ GENEL MÜDÜRLÜĞÜ VKN:3130025631	Melikgazi - 13-04-2021 10:15 - 20234	-
Beyan	3083 Sayılı Yasanın 6. Maddesine gereğince kısıtlıdır.(Şablon: 3083 Sayılı Kanunun 6. Maddesine Göre Belirtme)		Melikgazi - 12-04-2017 13:46 - 13397	-



Zoning And Land Layout

APLIKASYON KROKİSİ

İLİ : KAYSERİ
İLÇESİ : MELİKGAZİ
MAHALLESİ: AĞIRNAS
PAFTA : K35-A-20-B-4
ADA: 402
PARSEL: 9



KOORDİNE ÖZET ÇİZELGESİ

(ITRF-96 KOORDİNAT SİSTEMİ)

Nokta No	Y	X
1	476789.781	4300368.641
2	476883.855	4300328.798
3	476836.082	4300258.031
4	476811.796	4300221.742
5	476811.320	4300167.844
6	476715.113	4300111.185
7	476681.703	4300032.254
8	476654.224	4300012.856
9	476553.295	4300015.292

Şahin ERBAY
Harita Mühendisi
Dinamik Harita 12493

Şahin ERBAY
Harita Mühendisi
Dinamik Harita 12493

Annex D - Site Photographs

Photo No: 01	
Date: 05.03.2025	
Location: Subproject Area	
Details/Notes:	
Photo No: 02	
Date: 05.03.2025	
Location: Subproject Area	
Details/Notes:	
Photo No: 03	
Date: 05.03.2025	
Location: Subproject Area	

Details/Notes:	
Photo No: 04	
Date: 05.03.2025	
Location: Subproject Area	
Details/Notes:	
Photo No: 05	
Date: 05.03.2025	
Location: Ağırnas Neighborhood	

Details/Notes:

Consultation of Mukhtar of Ağırnas Neighborhood



Photo No: 06

Date: 05.03.2025

Location:

Ağırnas Neighborhood

Details/Notes:

Consultation meeting with the owner of the livestock farm

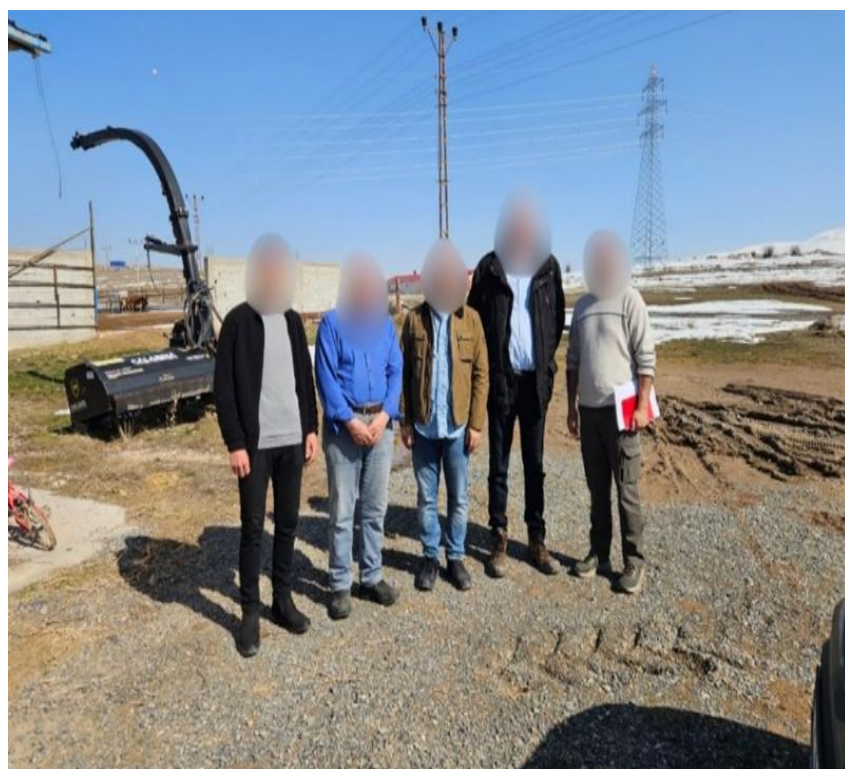


Photo No: 07

Date: 05.03.2025

Location:

Ağırnas Neighborhood

Details/Notes:

Livestock farm



Annex E - Baseline Measurements

Annex F - E&S Incident Notification Form Template

1) Incident Details			
Date of Incident: [Please indicate]		Time of Incident: [Please indicate]	
Location of the Incident:		[Please indicate]	
Full Name of Sub-borrower:		[Please indicate]	
Date Reported to ILBANK: [Please indicate]		Reported to ILBANK by: [Please indicate]	Notification Type: [Please indicate; e-mail/phone call/media notice/other]
Date Reported to WB: [Please indicate]		Reported to WB by: [Please indicate]	Notification Type: [Please indicate; e-mail/phone call/media notice/other]
Full Name of the Contractor of the Sub-project:		[Please indicate]	
Full Name of the Sub-contractor involved in the incident:		[Please indicate]	
2) Type of incident (please check all that apply) ⁵			
☐ Fatality ☐ Lost time injury ☐ Displacement without due process ☐ Child labor ☐ Forced labor ☐ Disease outbreaks		☐ Acts of violence/protest ☐ Unexpected impacts on heritage resources ☐ Unexpected impacts on biodiversity resources ☐ Environmental pollution incident ☐ Dam failure ☐ Other	
3) Description/Narrative of Incident			
<i>For example:</i> I. What is the incident? [Please briefly describe] II. What were the conditions or circumstances under which the incident occurred (if known)? [Please briefly describe] III. Are the basic facts of the incident clear and uncontested, or are there conflicting versions? What are those versions? [Please briefly describe] IV. Is the incident still ongoing or is it contained? [Please briefly describe] V. Have any relevant authorities been informed? [Please briefly describe]			
4) Actions taken to contain the incident			
Short Description of Action	Responsible Party	Expected Date	Status

⁵ See Appendix 2 for definitions.

For incidents involving a Contractor:

Name of Contractor:

Have the works been suspended? Yes ☐ No ☐

Note: Please attach a copy of the instruction suspending the works

5) What support has been provided to affected people

[Please briefly describe]

APPENDICES

Appendix 1: Supporting documents

[Note: Please mark the relevant documents available at this stage and submit them attached to the report]:

- ☐ Copy of the social security registration records of the victims and involved persons
- ☐ Copy of the instruction suspending the works
- ☐ Statement of victims
- ☐ Statement of witnesses
- ☐ Copies of notifications done to the relevant authorities
- ☐ Copies of legal investigation reports of relevant authorities
- ☐ Copies of E&S training records of the affected and involved persons
- ☐ Copies of OHS training records of the affected and involved persons
- ☐ Photographs related to the incident
- ☐ Others

Appendix 2: Incident Types

The following are incident types to be reported using the environmental and social (E&S) incident response process:

Fatality: Death of a person(s) that occurs within one year of an accident/incident, including from occupational disease/illness (e.g., from exposure to chemicals/toxins).

Lost Time Injury: Injury or occupational disease/illness (e.g., from exposure to chemicals/toxins) that results in a worker requiring 3 or more days off work, or an injury or release of substance (e.g., chemicals/toxins) that results in a member of the community needing medical treatment.

Acts of Violence/Protest: Any intentional use of physical force, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, deprivation to workers or project beneficiaries, or negatively affects the safe operation of a project worksite.

Disease Outbreaks: The occurrence of a disease in excess of normal expectancy of number of cases. Disease may be communicable or may be the result of unknown etiology.

Displacement Without Due Process: The permanent or temporary displacement against the will of individuals, families, and/or communities from the homes and/or land which they occupy without the provision of, and access to, appropriate forms of legal and other protection and/or in a manner that does not comply with an approved resettlement action plan.

Child Labor: An incident of child labor occurs: (i) when a child under the age of 14 (or a higher age for employment specified by national law) is employed or engaged in connection with a project, and/or (ii) when a child over the minimum age specified in (i) and under the age of 18 is employed or engaged in connection with a project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development.

Forced Labor: An incident of forced labor occurs when any work or service not voluntarily performed is exacted from an individual under threat of force or penalty in connection with a project, including any kind of involuntary or compulsory labor, such as indentured labor, bonded labor, or similar labor-contracting arrangements. This also includes incidents when trafficked persons are employed in connection with a project.

Unexpected Impacts on heritage resources: An impact that occurs to a legally protected and/or internationally recognized area of cultural heritage or archaeological value, including world heritage sites or nationally protected areas not foreseen or predicted as part of project design or the environmental or social assessment.

Unexpected impacts on biodiversity resources: An impact that occurs to a legally protected and/or internationally recognized area of high biodiversity value, to a Critical Habitat, or to a Critically Endangered or Endangered species (as listed in IUCN Red List of threatened species or equivalent national approaches) that was not foreseen or predicted as part of the project design or the environmental and social assessment. This includes poaching or trafficking of Critically Endangered or Endangered species.

Environmental pollution incident: Exceedances of emission standards to land, water, or air (e.g., from chemicals/toxins) that have persisted for more than 24 hours or have resulted in harm to the environment.

Dam failure: A sudden, rapid, and uncontrolled release of impounded water or material through overtopping or breakthrough of dam structures.

Other: Any other incident or accident that may have a significant adverse effect on the environment, the affected communities, the public, or the workers, irrespective of whether harm had occurred on that occasion. Any repeated non-compliance or recurrent minor incidents which suggest systematic failures that the task team deems needing the attention of Bank management.

Annex G – E&S Incident Investigation Form Template

1) Investigation Findings						
For example: I. where and when the incident took place, II. who was involved, and how many people/households were affected, III. what happened and what conditions and actions influenced the incident, IV. what were the expected working procedures and were they followed, V. did the organization or arrangement of the work influence the incident, VI. were there adequate training/competent persons for the job, and was necessary and suitable equipment available, VII. what were the underlying causes; where there any absent risk control measures or any system failures.						
2) Corrective Actions from the investigation to be implemented (to be fully described in Corrective Action Plan)						
Action	Action	Action	Action	Action	Action	Action
3a) Fatality/Lost Time Injury Information						
Fatality ☐			Lost time injury ☐			
Immediate cause of fatality/injury for worker or member of the public (please check all that apply) ⁶: ☐ Caught in or between objects ☐ Struck by falling objects ☐ Stepping on, striking against, or struck by objects ☐ Drowning ☐ Chemical, biochemical, material exposure ☐ Falls, trips, slips ☐ Fire & explosion ☐ Electrocution ☐ Homicide ☐ Medical Issue ☐ Suicide ☐ Project Vehicle Work Travel ☐ Non-project Vehicle Work Travel ☐ Project Vehicle Commuting ☐ Non-project Vehicle Commuting ☐ Vehicle Traffic Accident (Members of Public Only) ☐ Other						
Name	Age/ Date of Birth	Nationality	Gender	Date of Fatality/ Injury	Cause of Fatality/ Injury	Affected Party (Employee/ Public)
			☐ Female ☐ Male			☐ Sub-borrower employee ☐ Contractor employee ☐ Sub-contractor employee ☐ Public

⁶ See Appendix 1 for definitions

3b) Financial Support/Compensation Types (to be fully described in Corrective Action Plan template – template is given in Appendix 3)

- | | |
|--|--|
| ☐ No Compensation Required | ☐ Contractor Insurance |
| ☐ Workman's Compensation/National Insurance | ☐ Other |
| ☐ Contractor Direct | ☐ Court Determined Judicial Process |

Name	Compensation Type	Compensation Amount (TRY)	Responsible Party

4) Supplementary Narrative

Appendix 1: Definition of fatality/injury immediate causes

1. **Caught in or between objects:** caught in an object; caught between a stationary object and moving object; caught between moving objects (except flying or falling objects).
2. **Struck by falling objects:** slides and cave-ins (earth, rocks, stones, snow, etc.); collapse (buildings, walls, scaffolds, ladders, etc.); struck by falling objects during handling; struck by falling objects.
3. **Stepping on, striking against, or struck by objects:** stepping on objects; striking against stationary objects (except impacts due to a previous fall); Striking against moving objects; Struck by moving objects (including flying fragments and particles) excluding falling objects.
4. **Drowning:** respiratory impairment from submersion/emersion in liquid.
5. **Chemical, biochemical, material exposure:** exposure to or contact with harmful substances or radiations.
6. **Falls, trips, slips:** falls of persons from heights (e.g., trees, buildings, scaffolds, ladders, etc.) and into depths (e.g., wells, ditches, excavations, holes, etc.) or falls of persons on the same level.
7. **Fire & explosion:** exposure to or contact with fires or explosions.
8. **Electrocution:** exposure to or contact with electric current.
9. **Homicide:** a killing of one human being by another.
10. **Medical Issue:** a bodily disorder or chronic disease.
11. **Suicide:** the act or an instance of taking, or attempting to take, one's own life voluntarily and intentionally.
12. **Others:** any other cause that resulted in a fatality or injury to workers or members of the public.

Vehicle Traffic

- 13. Project Vehicle Work Travel:** traffic accidents in which project workers, using project vehicles, are involved during working hours and which occur in the course of paid work.
- 14. Non-project Vehicle Work Travel:** traffic accidents in which project workers, using non-project vehicles, are involved during working hours and which occur in the course of paid work.
- 15. Project Vehicle Commuting:** traffic accidents in which project workers, using project vehicles, are involved while travelling to (i) the worker's principal or secondary residence; (ii) the place where the worker usually takes his or her meals; or (iii) the place where he or she usually receives his or her remuneration.
- 16. Non-project Vehicle Commuting:** traffic accidents in which project workers, using non-project vehicles, are involved while travelling to (i) the worker's principal or secondary residence; (ii) the place where the worker usually takes his or her meals; or (iii) the place where he or she usually receives his or her remuneration.
- 17. Vehicle Traffic Accident (Members of Public Only):** traffic accidents in which non-project workers/members of the public are involved in an accident while travelling for any purpose.

Appendix 2: Supporting documents

[Note: Please mark the relevant documents available and submit them attached to the report]:

- ☐ Copy of the social security registration records of the victims and involved persons
- ☐ Copy of the instruction suspending the works
- ☐ Statement of victims
- ☐ Statement of witnesses
- ☐ Copies of notifications done to the relevant authorities
- ☐ Copies of legal investigation reports of relevant authorities
- ☐ Copies of E&S training records of the affected and involved persons
- ☐ Copies of OHS training records of the affected and involved persons (such as basic OHS training, induction training, visitors training, job-specific training, refreshment training, etc.)
- ☐ Photographs related to the incident
- ☐ Health examination records of the affected and involved employees
- ☐ Copies of Personal Protective Equipment delivery forms (signed copies)
- ☐ Root Cause Analysis completed for the incident
- ☐ Information/documentation related to any judicial process
- ☐ Others

Appendix 3: Corrective Action Plan template

Action No:	Brief Description of E&S non-compliance	Corrective Action	Financial and Human Resources Required	Responsible Party	Due Date for Completion of Corrective Action	Indicators for Successful Completion of Corrective Action	Status of Corrective Action

Annex H - Chance Find Procedure

Chance Find Procedure

Introduction

This document describes the Chance Find Procedure for subproject, outlining the procedures that will be followed in case of chance finds occur during the construction activities associated with the subproject.

Scope

This Chance Find Procedure (CFP) will be implemented for Kayseri Water and Sewerage Directorate (KASKİ)-AĞIRNAS SPP sub-project in order to manage any chance finds that may be encountered during the construction activities. The purpose of the CFP document is to:

- outline the applicable legislation and standards relevant to this procedure;
- define roles and responsibilities;
- define project commitments, operational procedures, training requirements and guidance relevant to this procedure; and
- define monitoring and reporting procedures.

Although there are no known archaeological sites or remains within the subproject area, it is considered that there may be a potential to encounter archaeological findings during the construction of the subproject. Activities which have high potential to lead to discover or adversely affect the archeological resources are;

- topsoil stripping
- excavation and earthworks

This CFP is prepared in order to provide information to the contractors and employees regarding the actions to be taken in case of an archaeological chance find procedure.

Legislation and Standards

Legislation and standards that apply to the project comprise the following:

- Word Bank Environmental and Social Standard (ESS) 8: Cultural Heritage
- applicable Turkish laws and national standards
- other commitments to and requirements of Turkish government authorities
- other industry guidelines with which the project has committed to comply

In Türkiye, movable and immovable cultural and natural assets are protected and preserved by the Law on Preservation of Cultural and Natural Assets (Law No. 2863) published in the Official Gazette dated 23.07.1983 and numbered 18113. Law 2863 establishes legal protection for the following:

- all natural assets and immovable cultural assets constructed up until the end of the 19th century,
- any immovable cultural asset from after the end of the 19th century, identified by the Ministry of Culture and Tourism as an important asset worthy of preservation,

- all immovable cultural assets located within archeological sites,
- buildings/areas that have witnessed significant historical events during the National War and the foundation of the Turkish Republic and dwellings that have been used by Mustafa Kemal ATATÜRK, regardless of time and registration.

The Ministry of Culture and Tourism is the responsible body to take decisions for protection of cultural heritage in Türkiye at the national level. As part of the Ministry, the High Commission for the Protection of Cultural Assets is responsible for protecting and restoring immovable cultural assets. Implementation of the decisions and regulations issued by the Ministry are undertaken by local administrations. At local level, there are Cultural Assets Protection Regional Boards defined by the Ministry of Culture and Tourism, which are responsible for preservation, registration and classification of cultural heritage within their respective jurisdictions. The relevant Regional Board for the project is the Kayseri Cultural Heritage Protection Regional Board Directorate.” According to Law 2863, all the natural and cultural assets qualified for legal preservation are properties of the State. Therefore, regional boards have the power and authority to provide legal protection to the preservation sites and to approve or reject all the activities, which have potential negative impacts on the preservation sites such as construction, demolition and excavation activities.

Roles and Responsibilities

Principal roles and responsibilities for the implementation of this procedure are outlined below.

Role	Responsibilities
Contractor - Project Manager	• Overall responsibility for the development, review, approval and coordination of the numerous activities required to initiate, conduct and complete construction. • Ensure that this procedure is prepared, and updated as required, based on the activities undertaken as part of the project. • Ensure that adequate resources are made available to implement the procedures and guidelines outlined in this procedure.
Contractor - Environmental and Social (E&S) Expert	• Initiation, development, implementation and coordination of the CFP during construction. • Ensure that adequate training is given to all site personnel and sub-contractors, covering the procedures and guidelines outlined in this procedure. Establish appropriate control procedures and conduct audits as necessary. • Consultation with and reporting to relevant government bodies in case of potential archeological chance finds. • Record all confirmed chance finds by filling up the “Chance Find Reporting Form” and maintain copies in a log-book. Ensure that the chance finds log-book is up to date.
Contractor - Site Manager	• Day-to-day implementation of the provisions of the CFP in the field during construction. • Notify the E&S Expert regarding potential chance finds during construction.
Employees	• Understand and comply with archeological chance finds procedures and guidelines outlined in this procedure. • Reporting of the potential chance finds to the Site Manager.

Impact Avoidance and Mitigation

In the event of an archaeological discovery, the following actions will be implemented:

- All staff involved in land clearance and excavation activities will take the responsibility for managing archaeological protection and will be trained in these aspects by the E&S Expert.
- In case any potential chance find is encountered, all construction activities will cease immediately in the vicinity of the chance find.
- The Site Manager will be contacted immediately. The discovered site location, the characteristics of the potential archaeological material and photos will be recorded by the Site Manager, who in turn will inform the E&S Expert.
- Kayseri Museum Directorate will be notified at the latest within three days after the chance find is encountered. Contact details of the Kayseri Museum Directorate are given below:
Address: Cumhuriyet Mahallesi Kaleiçi Çarşı Kümeevler No:1/1 Melikgazi/KAYSERİ
Telephone: 0 352 222 21 49
E-mail: kayserimuzesi@kultur.gov.tr
- The site and its vicinity will be secured 24 hours a day against damage or loss, until inspection by the authority.
- The E&S Expert will fill up a “Chance Find Report Form” for each confirmed chance find and inform the Project Manager about the date that the construction work can resume, which is determined by the authorities concerning the conservation of the heritage.
- Further steps to be followed and proper plan to be implemented for the management of the finds (Changes in the layout, conservation, preservation, restoration and salvage) will be decided and reported in writing by the authorities in charge.
- Photographs of the potential artifacts that are likely to be encountered in the construction site are presented in the following pages to be used during the training of the relevant staff.

Verification and Monitoring

E&S Expert/s will record all cases of archaeological chance finds. He/she will fill up a “Chance Find Reporting Form” for each chance find confirmed by the authority and maintain copies in a logbook. A sample of a reporting form which can be used to record chance finds is included below. The chance find logbook will be summarized on an annual basis and records included in semi-annual monitoring reports to verify that correct management procedures have been followed. Action items will be taken in cases of non-adherence to this CFP.

Reporting

Contractor will comply with reporting requirements including chance finds defined in site-specific ESMP (contractor will develop monthly and quarterly monitoring reports and submit to Kayseri Municipality/KASKI through supervision consultant; Kayseri Municipality/KASKI will examine submit the reports to ILBANK quarterly (and monthly if requested by ILBANK); ILBANK will inform the World Bank by providing regular semi-annual monitoring reports.

KASKI-AĞIRNAS SPP Subproject Chance Find Reporting Form		
REGISTRATION		
Name of recorder:		
Date and time of discovery:		
Site Name:	Coordinates	
	X	Y
Description of find:		
Photograph: 		
Estimated weight and dimensions:		
CONTACT PERSON		
Name/Title/Duty:		
Date and Time:		
Contact information:		

Details of conversation:	
DECISIONS	
Any protection measures to be implemented:	
Movable or immovable: If moved, please specify the new location.	
Further actions required:	
Recommence date and time:	
Notes:	
SUBMISSION	
Name:	Date:

Annex I - Change Notification Form

Change Notification Form	
Sub-project Name	
Sub-project Location	
Sub-project Phase	☐ Pre-construction
	☐ Construction
	☐ Operation
Name of the Institution Notifying the Change	
Date	
Category of the Change (please select all that apply)	☐ Legislative Change
	☐ Design Change
	☐ Schedule Change due to E&S factors
	☐ Project Schedule Changes due to technical, financial, legal or administrative factors
	☐ Changes due to E&S issues encountered at Sub-project implementation
	☐ Contractor or Construction Supervision Consultant Change
	☐ Other (please specify below)
Detailed Description of the Change(s)	
Documents Submitted with Change Notification Form	
Name of the Staff Notifying the Change	
Position of the Staff Notifying the Change	
Signature	

Annex J – Consultation Form



LIBANCONSULT AGM
Consulting Engineers

İSTİŞARE FORMU

İstişare Konusu	Ağırnas Köyünün sosyo-ekonomik durumu		
İstişare Yeri	Ağırnas Muhtarlığı		
Tarih ve Saat	05.03.2025 14:00	Hazırlayan	

Konu	Tartışılan Konular/Alınan Kararlar
Ağırnas Köyünün sosyo-ekonomik durumu	Muhtarlık muhtarı ile köy sosyo-ekonomik durumuna dair görüşme yapıldı. Muhtar, köyün nüfus, demografik yapısı, köy sakinlerinin yaşam koşulları, köydeki eğitim ve sağlık hizmetleri, su, kanalizasyon, doğalgaz, elektrik altyapısı, ulaşıma ve taşıt durumu, kültürel varlıkları ve kırsal gruplar hakkında bilgiler verildi.

İstişare Görüşmesi Katılımcıları

Ad-Soyad	Kurum	Unvan	İmza
	Köy Enerji Sosyal Hizmetleri		