



Environmental and Social Management Plan

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Kinali - Tekirdag - Canakkale - Savastepe
Motorway Project:

**Malkara - Canakkale Section (including
1915 Canakkale Bridge)**

To: COK A.Ş.

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CONTENTS

ABBREVIATIONS	3
1 INTRODUCTION	4
1.1 <i>PURPOSE</i>	4
1.2 <i>PROJECT DESCRIPTION</i>	5
2 PROJECT EHS MANAGEMENT SYSTEM	8
2.1 <i>PROJECT REQUIREMENTS, REGULATIONS AND STANDARDS</i>	11
2.1.1 <i>COK A.S. Code of Conduct and Policies</i>	11
2.1.2 <i>National Legislation</i>	11
2.1.3 <i>International Standards and Regulations</i>	12
2.1.4 <i>Environmental and Social Impact Assessment</i>	13
2.2 <i>EHS COMMITMENTS REGISTER</i>	15
2.3 <i>PROJECT EHS MANAGEMENT PLANS</i>	15
2.4 <i>EPC CONTRACTOR EHS MANAGEMENT PROCEDURES</i>	16
2.5 <i>OPERATIONAL EHS MANAGEMENT FRAMEWORK</i>	21
3 PROJECT ORGANISATIONAL STRUCTURE	24
3.1 <i>OVERALL PROJECT ORGANIZATION</i>	24
3.2 <i>COK A.S. EHS ROLES AND RESPONSIBILITIES</i>	25
3.3 <i>EPC CONTRACTOR EHS ROLES AND RESPONSIBILITIES</i>	27
4 EHS MANAGEMENT CONTROLS	29
4.1 <i>EPC CONTRACTOR SELF-VERIFICATION PROGRAMME</i>	29
4.1.1 <i>EPC Contractor Pre-Construction Surveys</i>	30
4.1.2 <i>EPC Contractor Inspections and Audits</i>	31
4.1.3 <i>EPC Contractor Action Tracking, Non-Conformance and Incident Response and Notification System</i>	31
4.1.4 <i>EPC Contractor Monitoring and Reporting</i>	32
4.2 <i>COK A.S. EHS OVERSIGHT AND ASSURANCE PROGRAMME</i>	32
4.2.1 <i>COIKIYI EHS Oversight (Monitoring)</i>	32
4.2.2 <i>COK A.S. Regular EHS Oversight Reporting</i>	33
4.2.3 <i>COK A.S. EHS Assurance Audits</i>	33
4.2.4 <i>Key Performance Indicators (KPIs)</i>	34
4.2.5 <i>COK A.S. EHS Reporting to Project Owner</i>	34
4.3 <i>ENVIRONMENTAL MONITORING</i>	34
4.4 <i>NON-CONFORMANCE REPORTING AND CORRECTIVE ACTIONS</i>	34
4.5 <i>INCIDENT REPORTING AND INVESTIGATION</i>	36
4.6 <i>EXTERNAL REPORTING</i>	36
5 MANAGEMENT OF CHANGE	38
5.1 <i>TRIGGERS/SOURCES FOR CONSIDERATION OF CHANGE</i>	39

5.2	<i>CHANGE PRE-SCREENING AND SCREENING</i>	40
5.2.1	<i>Pre-Screening</i>	40
5.2.2	<i>Screening Review</i>	40
5.3	<i>REVIEW AND REDESIGN CHANGE</i>	41
5.4	<i>STAKEHOLDER ENGAGEMENT</i>	41
5.4.1	<i>Inform specific stakeholders</i>	41
5.4.2	<i>Disclose Results and Consult Affected Stakeholders</i>	41
5.5	<i>FINALISATION OF CHANGE IMPACT UPDATE AND CHANGE/NOV</i>	42
5.6	<i>SUBMITTAL TO KGM FOR APPROVAL (IF RELEVANT)</i>	42
5.7	<i>SUMMARY</i>	42
6	<i>EHS TRAINING</i>	44
7	<i>MANAGEMENT REVIEW</i>	45
ANNEX A	<i>NATIONAL LEGISLATION AND PERMITS</i>	46
ANNEX B	<i>INTERNATIONAL REGULATIONS AND STANDARDS</i>	49
ANNEX C	<i>EHS COMMITMENTS REGISTER</i>	51
ANNEX D	<i>EXAMPLE OF A CHANGE SCREENING MATRIX</i>	52
ANNEX E	<i>SUMMARY OF ENVIRONMENTAL MONITORING REQUIREMENTS</i>	54

ABBREVIATIONS

ATS	Action Tracking System
CESMP	Construction Environmental and Social Management Plan
CLO	Community Liaison Officer
CMP	Construction Management Plan
CM	Change Management
EBRD	European Bank for Reconstruction and Development
EHS	Environmental, Health and Safety Throughout this document, EHS refers to Environmental, Occupational Health and Safety, Labour and Working Conditions, Socio-economic, Community Safety and Cultural Heritage aspects.
EIB	European Investment Bank
EPC	Engineering, Procurement and Construction
ESHS	Environmental & Social, Health and Safety
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
EU	European Union
Ha	Hectare
HSE-MS	Health, Safety and Environment Management System
IFC	International Finance Corporation
ILO	International Labour Organisation
ISO	International Standards Organisation
KPIs	Key Performance Indicators
NOV	Notice of Variation
OECD	Organisation for Economic Co-operation and Development
PAPs	Project Affected Peoples

1

INTRODUCTION

1.1

PURPOSE

This document is the Kinali-Tekirdağ-Çanakkale-Savaştepe Motorway Project Malakara – Çanakkale Section (the Project) Environmental and Social Management Plan (ESMP), Project reference number 0403910.

The purpose of this ESMP is to:

- Provide an overview of the environmental, health and safety, socio-economic and cultural heritage (EHS) policies, regulations and standards applicable to the Project;
- Document and direct COK A.S. Personnel and guide EPC Contractors on how Project EHS risks are managed during the construction stage of the Project to conform with applicable EHS policies, regulations and standards and ensure the Project Commitments are attained;
- Clarify EHS compliance assurance roles and responsibilities during the construction stage of the Project;
- Ensure that adequate processes are in place to appropriately monitor construction activities against Project EHS policies, regulations and standards;
- Ensure reporting systems are developed and implemented to communicate EHS compliance performance to COK A.S. leadership;
- Facilitate continual improvement and EHS compliance assurance.

The scope of this ESMP details the construction and commissioning stages of the Project and provides an EHS Management Framework for the operational stage. Recognising the fundamentally different conditions during operation stage, the ESMP will be updated in response to the potential environmental, socio-economic, cultural heritage, health and safety impacts and risks associated with the operational stage of the Project. This document will therefore be adjusted in response to the changed conditions, and a new ESMP version issued to support the operation stage of the Project, once sufficient details will be available as result of the operational readiness planning. The updated ESMP supported by adequate EHS Management Plans addressing the operational stage of the project will be available not later than 6 months before the Malkara – Çanakkale motorway section enters operation.

This ESMP provides an overview of the processes to identify, avoid, mitigate and manage Project EHS risk during the construction stage. The ESMP is the central document of the Project EHS management system and is supported by a series of subordinated EHS management plans and procedures implemented at Project and EPC Contractor levels:

- Project EHS Management Plans – see Figure 2-2 in section 2 for an overview of the management plans that detail the processes implemented by COK A.S. to ensure Project policies, standards and commitments are attained during the construction stage of the Project and guide EPC

Contractors on the requirements and management plans to be implemented for the Project as part of their EHS management system.

- EPC Contractor EHS Management Procedures – see section 2.4 for an overview of the EHS management plans to be put in place by the EPC Contractors to ensure implementation of the Project policies, standards and commitments during own Project construction activities.

1.2 PROJECT DESCRIPTION

The Kınalı-Tekirdağ-Çanakkale-Savaştepe (Kınalı-Balıkesir) Motorway with a length of 324km (i.e. the wider project of which the Malkara-Canakkale Motorway and 1915 Bridge is one segment), is one of the key KGM “Vision 2023” Projects.

The COK A.S. Motorway section (Figure 1-1) covers the segment of the Kınalı - Balıkesir Motorway starting at the Malkara Junction at around KM 106+840 and ending at KM 191+707 for a total of 88.5 km long motorway section including the 1915 Çanakkale Bridge (3563 m long span).

Figure 1-1 Overview of the Project (motorway section and the bridge)



Source: <http://1915canakkale.com/>

The Project can be sub-divided into three sections¹:

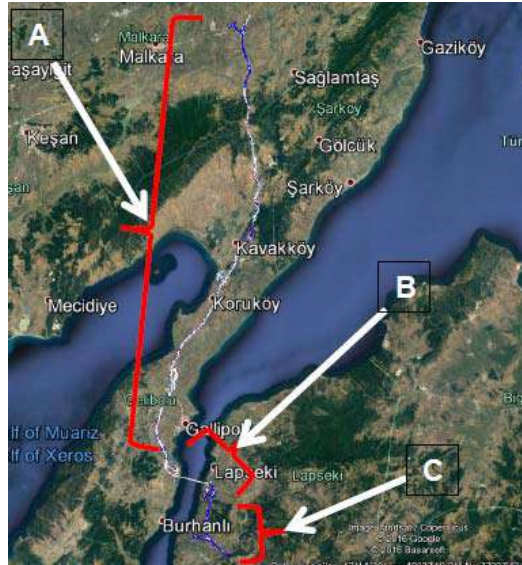
- A-Malkara Junction-Gelibolu South Junction (length 72.529 km; access road length 9.595 km)
- B- Gelibolu South Junction – Çanakkale 1 Junction (1915 Çanakkale Bridge)

¹ These dimensions are based on the ESIA ToR documents, subject to design change. Minor changes in the dimensions will not affect the ESIA results

- C-Çanakkale 1 Junction - Çanakkale 2 Junction (length 7.885 km, access road lengths 3.11 km; 1 viaduct-568.8m)

Figure 1-2

Sections of the Project



The Project involves construction of 5 junctions and exit entrances, 4 viaducts, 36 roadway overpasses, 33 underpasses, 7 toll stations, 4 service areas, 2 Operation and Maintenance areas and the 1915 Çanakkale Bridge. With a planned mid-span length of 2023 m, the Bridge will be the longest suspension bridge in the world. There will be walkways to be used for maintenance on both sides of the bridge. The bridge platform will have a 44.8m width and a 3.5m height. The design life for 1915 Çanakkale Bridge will be 100 years.

Figure 1-3

Overview of the 1915 Canakkale Bridge



In addition to the structures aforementioned, construction of the Motorway involves building of 140 culverts and 5 retaining walls. During construction, there will be three camps areas for the project (two for the bridge and one for the motorway):

- one camp is located at Dry Dock area and has a capacity to accommodate 1000 people;

- one camp is located on Asian side of the bridge alignment. The camp has a capacity to accommodate 500 workers;
- one camp is for motorway and is located in European side, close to the location with one of the service area (km 149+000) Koruköy , with 400 -500 people capacity.

The construction workforce for construction of the bridge is estimated to range between 1400 and 1700, while for the motorway's construction there will be employed approximate 1000 people. These figures include EPC staff plus the subcontractor's workforce.

The Project EHS Management System is based on a four-step iterative process aligned with the ISO 14001 Plan-Do-Check-Act model as represented in Figure 1 overleaf. The concept reflects an adaptive management feedback loop allowing for accommodation of changes that occur as the Project moves through the various implementation stages.

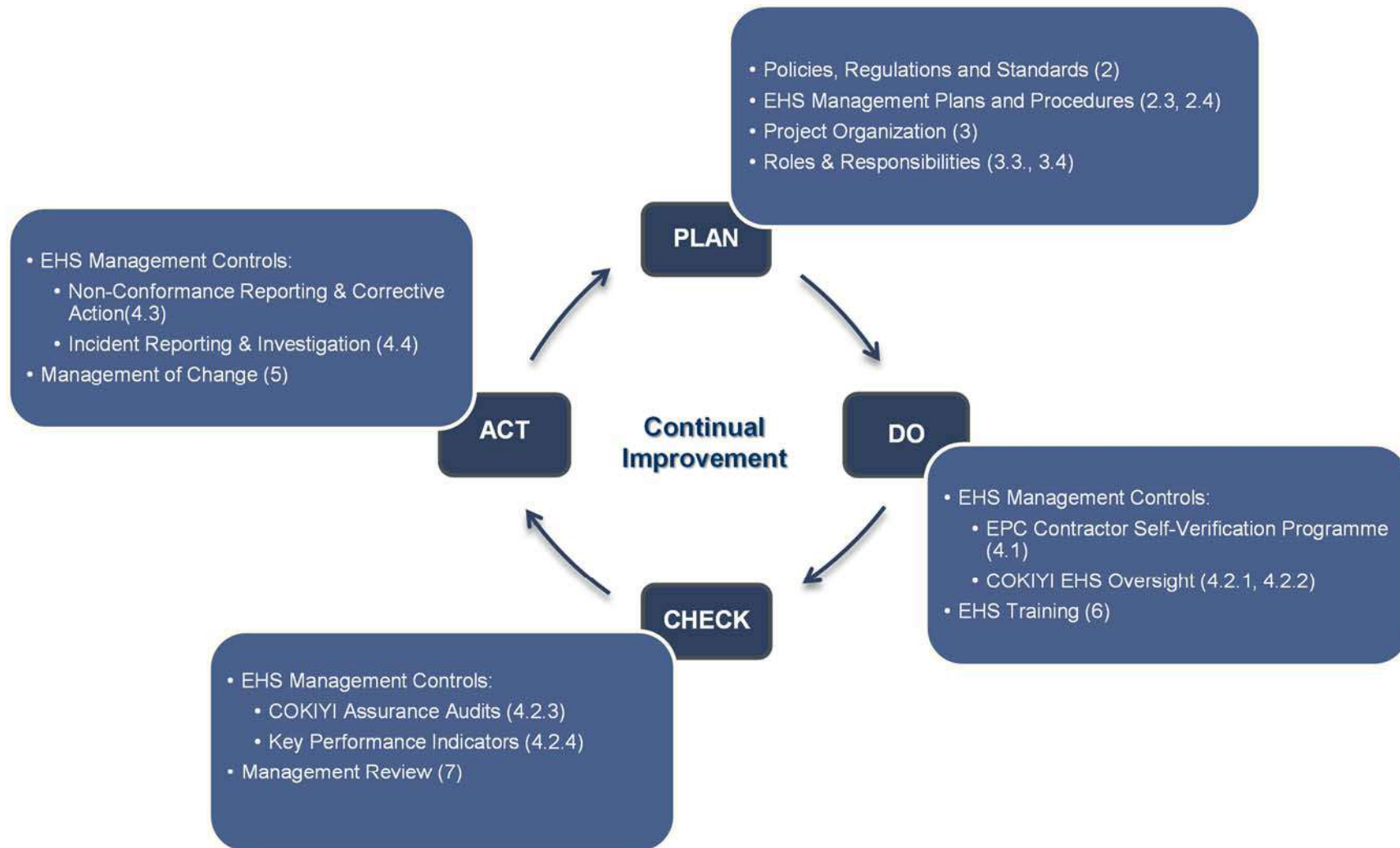
This management process is based on a staged approach initiated at the planning phase of the Project with the identification of the applicable requirements, regulations and standards and the definition of the leadership commitments stated in the Project EHS Policies and the Code of Conduct.

The planning stage continued with the identification and assessment of Project's EHS risks and impacts based on an Environmental and Social Impact Assessment (ESIA). The ESIA identified the embedded EHS controls and defined the mitigation measures required to address the residual EHS impacts and ensure that the Project requirements, regulations and standards are met. Addressing the EHS risks and impacts represents a Project commitment. Therefore, the EHS mitigation measures defined as result of the ESIA process were transposed into a Commitments Register serving as a tool which informs this ESMP as well as the subordinated EHS management planning and processes to be implemented at the various levels of the Project organization.

The ESMP is a key component of the Project EHS system, providing an overview of the processes and tools to manage Project EHS risks within the frame of the Plan-Do-Check-Act model. The ESMP also sets the requirements for the management planning (operational controls, performance review and evaluation) to be established and maintained by COK A.S. and the EPC Contractors.

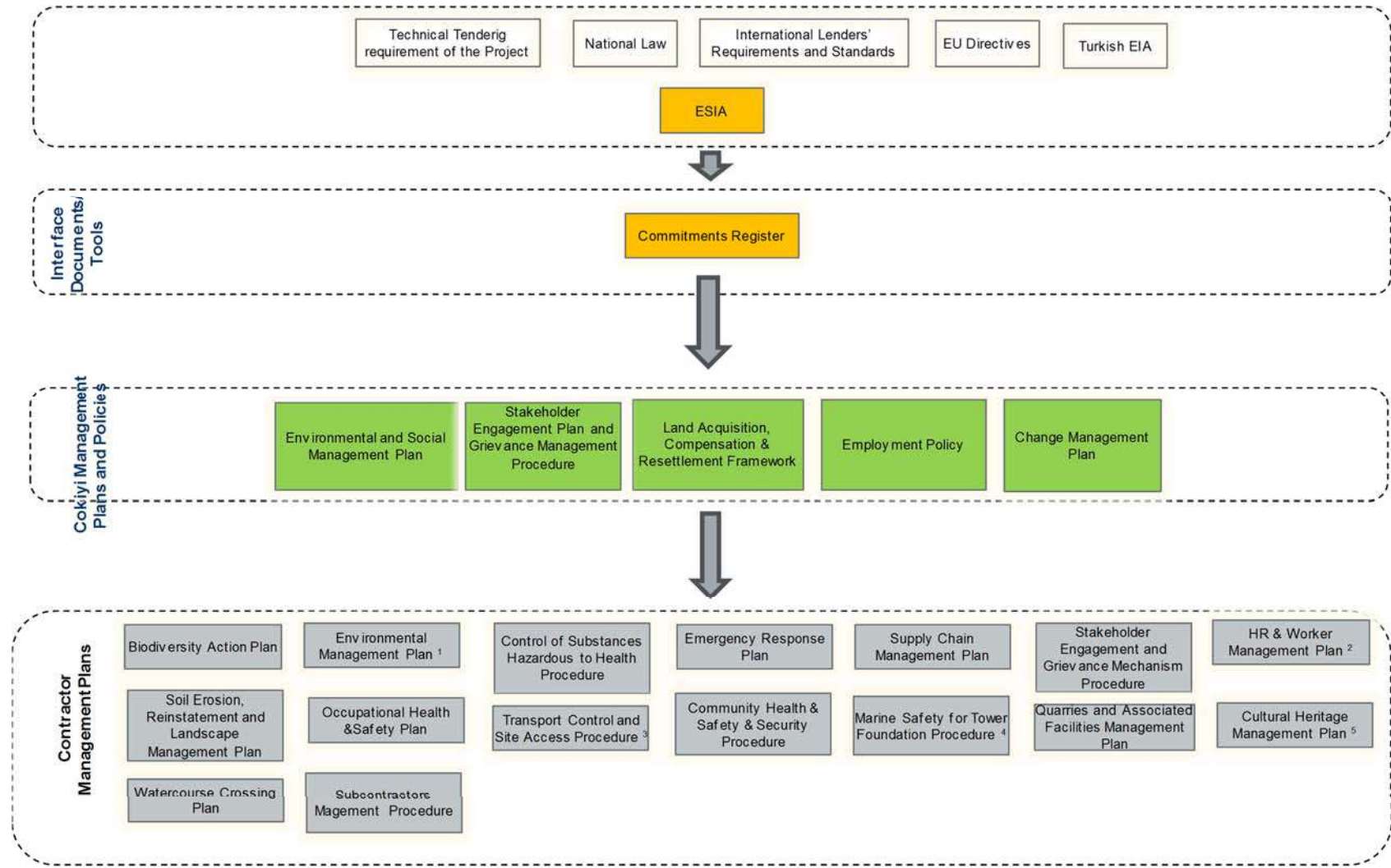
The relationship between the ESMP, the Project requirements, regulations and standards and the management plans at the various levels of the Project EHS Management System is represented in Figures 2-1 and 2-2 below. All these Project EHS management system components are described in the following sections of this ESMP chapter.

Figure 2-1 Project EHS Management System Process



(Numbers in brackets indicate the ESMP chapters detailing the respective topics)

Figure 2-2 EHS Management System Structure of Malkara – Canakkale Section Project



1 Includes Pollution Prevention, Spill Response, Air Emissions, Noise, Water Discharges, Waste Management, Resource Management related aspects
 2 Includes Influx Management aspects
 3 Includes Road Traffic and Site Access Management aspects
 4 Includes Marine Traffic, Marine Dredging, Construction and Environmental Design aspects
 5 Includes Chance Finds Procedure, including Unexploded Ordnance & other (non-Cultural Heritage) chance finds, onshore and off shore

2.1

PROJECT REQUIREMENTS, REGULATIONS AND STANDARDS

COK A.S. and its EPC Contractors are required to meet a number of key EHS requirements, regulations and standards as outlined below. This ESMP is intended to support transposition of these standards into Project implementation. In cases where the Project requirements and standards are inconsistent or contradictory, COK A.S. and its EPC Contractors are committed to applying the most stringent requirement unless otherwise justified to its stakeholders and confirmed with Project lenders.

2.1.1

COK A.S. Code of Conduct and Policies

To ensure that the Project is implemented in compliance with the Project Requirements, Regulations and Standards, COK A.S. has developed and committed to the below overarching policies which are applicable to all activities, including the construction works programme and all staff working for the Project.

- Health, Safety and Environmental Policy²;
- Employment Policy Document.

These policies establish the framework for the Project's environmental, social, health and safety management processes as further developed and defined within this ESMP. The Health, Safety and Environmental Policy are being made available on COK A.S. website.

2.1.2

National Legislation

Turkish Environmental Law (Law No: 2872), which came into force in 1983, handles environmental issues on a very broad scope. Under the Environmental Law, environmental regulations have been developed in line with national and international initiative and standards, and some of them have been revised recently to be harmonized with the European Union (EU) Directives in the scope of pre-accession efforts of Turkey.

Complementary to the Environmental Law and its regulations, the laws listed below also govern the protection and conservation of the environment, prevention and control of pollution, implementation of measures for the prevention of pollution, health and safety and labor issues:

- Electricity Market Law (Law No: 6446)
- Energy Efficiency Law (Law No: 5627)
- Expropriation Law (Law No: 2942)
- Forestry Law (Law No:6831)
- Groundwater Law (Law No: 167)
- Labor Law (Law No:4857)

² Includes social and security personnel-related commitments.

- Law on the Conservation of Cultural and Natural Assets (Law No:2863)
- Law on Improvement of Olive Cultivation and Budding of Wild Species (No:3573)
- Law on Soil Protection and Land Use (Law No:5403)
- Mining Law (Law No:3213)
- Municipality Law (Law No: 5393)
- National Parks Law (Law No: 2873)
- Pasture Law (Law No:4342)
- Public Health Law (Law No: 1593)
- Resettlement Law (Law No: 5543)
- Traffic Law (Law No:2918)

The primary environmental laws, regulations, by-laws and communiqués and other complementary national regulations applicable to the infrastructure projects are provided in Annex A. COK A.S. and its EPC Contractors will comply with the requirements of relevant national legislations and codes of practice, and fulfil all other legal requirements.

The EPC Contractor maintains a Permit Register listing all permits required by the national regulations for construction activities. Up-to-date Permit Register is provided to COK A.S. with the monthly reports Critical paths and bottlenecks between permitting timeframe and construction schedule must be identified and discussed with COK A.S.. Timing for critical permitting process must be considered in the construction schedule.

2.1.3 *International Standards and Regulations*

The international standards to be applied to the Project are categorised as follows:

- International Standards (ISO 14001:2015, OHSAS 18001:2007, European Safety Agency Standards);
- EBRD Policy and Performance Requirements (2014);
- EBRD Sub-sectoral Environmental and Social Guidelines (i.e. Building and Construction Activities, 2010)
- IFC Performance Standards (January 2012);
- IFC Environmental, Health, and Safety (EHS) General Guidelines;
- IFC Environmental, Health, and Safety Guidelines for Toll Roads;
- IFC/EBRD Worker's Accommodation: Processes and Standards;
- EIB Statement of Environmental and Social Principles and Standards (2009);
- OECD Revised Council Recommendation on Common Approaches on Environment and Officially Supported Credits;
- Equator Principles III (June 2013);
- EU environmental, social and OH&S Directives ;
- International Labour Organization (ILO)'s fundamental conventions concerning the abolition of child labour, the elimination of discrimination at the workplace and the elimination of forced and compulsory labor;

- International Standards (ISO 14001, OHSAS 18001, EBRD road safety audit requirements)

International best practice regarding the mitigation of impacts and consideration of minorities and vulnerable persons.

A list of applicable international standards is provided in Annex B.

Each organization (both COK A.S. and the EPC Contractor) is responsible for the monitoring of the updates in the EHS legislation. At COK A.S., the EHS Department is responsible for this task. EPC Contractor is required to inform COK A.S. on the regulatory changes affecting their activities and on their implications with the monthly reports.

2.1.4 *Environmental and Social Impact Assessment*

An ESIA in line with best international practice was completed for the Project.

Table 2-1 *Summary of the ERM ESIA Process and Project Context*

ESIA Stage	Description	Project Context
Screening	Screening is the first stage in impact assessment, in which the need for assessment and the level of assessment required is determined for a particular project.	Need for EIA/ESIA was established under the Turkish EIA regulations. A full scope ESIA is expected of lenders for such a Category A project.
Scoping	This is where the key issues to be addressed in the ESIA are identified. Scoping ensures that the process is focused on the significant environmental and social (E&S) impacts, which may arise from the Project, also taking into account the results of consultations undertaken to date on the Project.	Scoping was performed for this ESIA, also considering input from Turkish EIA and initial meetings held in Project area by ESIA Team in May 2017 and thereafter.
Baseline development	For the key issues identified in scoping, available information on the current environmental and social conditions is gathered, and this is supplemented by field studies and surveys where necessary.	Baseline information was collected for various E&S topics, as determined per the results of the Scoping.
Impact assessment	This stage is focused on predicting E&S changes from the baseline as a result of constructing and operating the proposed Project. Each impact is evaluated to determine its significance for the environment and society by reference to established standards and norms. The focus is on identifying the significant impacts (<i>i.e.</i> the most important and the impacts with the potential to cause greatest harm) although the assessment reviews a wider range of possible impacts	The impact assessment is performed as described in this document for the relevant topics and identified potential impacts. For each topic, the standard procedure is followed of: <ul style="list-style-type: none"> - predicting the potential Magnitude of an impact; - evaluating the Sensitivity of the receptors; and on this basis determining the resulting impact Significance.

ESIA Stage	Description	Project Context
	to determine which are likely to be significant.	
Mitigation measures	Following the prediction and evaluation of impacts in the previous stage, solutions (or mitigation measures) are developed to reduce the significant impacts. Mitigation can either be amending the Project design or through methods to be adopted during construction or operation of the project. Mitigation included measures to avoid, reduce or remedy adverse effects, and where this is not possible to provide compensation by offering resources or facilities to replace those that are lost. Mitigation can also include measures to provide environmental and social benefits.	Two types of mitigation measures were defined for this Project: -the “Embedded Controls” representing the many actions and physical measures that will be implemented for the Project in compliance with Turkish laws and/or are part of the Project design; and - the “Mitigation Measures” that are required on top of the Embedded Controls to further reduce Significance of an impact to an acceptable level.
ESMP	The various mitigation measures are compiled in a Commitments Register and presented in an E&S Management Plan (ESMP), describing how the measures will be implemented during the detailed design, construction and operation of the project.	The Commitments from the Turkish EIA as well as the mitigation measures defined for the Project as Embedded Controls or additional mitigation measures are compiled within the Commitments Register which is provided as <i>Annex II B</i> of the Volume II of the ESIA. The ESMP which forms Volume V of the ESIA details the responsibilities and resources for implementation, the timing and monitoring and audit plans to ensure that all the mitigation commitments are met. It also identified any requirements for training and other capacity building.
Stakeholder Engagement Plan	The Stakeholder Engagement Plan details how the Project will continue to engage with external stakeholders during the following stages of its development including establishment of a Grievance Process	This included as <i>Annex II A</i> to the Volume (II) of the ESIA.
Resettlement Framework Policy (Land Acquisition and Compensation Resettlement Framework)	The Resettlement Framework Policy (the full name Land Acquisition and Compensation Resettlement Framework - LACRF , will identify potential displacement associated with the Project and “establish the principles, procedures, and organisational arrangements by which the Project Sponsor will abide during project implementation” (reference: IFC	The LACRF for the Project has been developed in advance of the preparation of a Land Acquisition and Compensation Resettlement Plan (LACRP) for the Bridge and the motorway. It has been included as Volume V to this ESIA.

ESIA Stage	Description	Project Context
	Handbook for Preparing a Resettlement Action Plan) .	

During the ESIA studies, the team frequently seeks the views of interested parties so that these can be taken into account in the assessment and reflected in the proposals for mitigation. Once complete, the ESIA Report will be subject to public disclosure and comment and all comments will be taken into account in revising the final ESIA Report and ESMP.

Throughout the ESIA the team carried out ongoing collaboration with the Project designers and engineering team to ensure that potential impacts are accurately assessed and appropriate mitigation is developed.

2.2 *EHS COMMITMENTS REGISTER*

Upon completion of the ESIA process, the mitigation measures to address potential project impacts as defined in the ESIA were transferred into a Commitments Register in the form of actionable measures, management and monitoring activities for implementation during Project implementation stages.

The Commitments Register provides summary of all actions which the Project has committed to execute to ensure the environmental/ social/health committed environmental, social, health and safety performance. The Commitments Register was developed in an easily understandable format allowing to be used as a tool by the Project EHS staff during Project execution.

The Commitments Register informed the Project Management Plans which detail the procedures put in place by the Project staff and the EPC Contractor requirements to ensure commitments implementation.

The Commitments Register represents an integral part of this ESMP and is provided in Annex C of this document.

2.3 *PROJECT EHS MANAGEMENT PLANS*

A number of EHS Management Plans, currently under development by COK A.S. and its consultants will ensure the implementation of Project commitments, requirements, regulations and standards as follows:

- Stakeholder Engagement Plan and Grievance Management Procedure;
- Land Acquisition, Compensation & Resettlement Framework Policy /Plan;
- Employment Policy (Influx Management aspects included);
- Change Management Plan;

During the construction phase, the EHS operational controls embedded in these EHS Management Plans focus on:

- Implementation by the EPC Contractors of COK A.S.'s EHS standards and specifications.

- Oversight of EPC Contractor activities (engineering, procurement, construction) to measure the effectiveness of their self-verification processes with EHS commitments, requirements, regulations and standards.
- Compliance and assurance to assure that the work planned and performed is conducted according to the EHS commitments, requirements, regulations and standards.

To ensure the EPC contractors develop appropriate processes to implement and self-verify compliance with the EHS standards and specifications, the requirements for developing of the EHS Management Plans indicated above were included in the EPC contractual documents.

COK A.S. Management Plans detail the management and implementation processes required to achieve Project commitments, requirements, regulations and standards. The management plans include information on the COK A.S. EHS oversight, compliance and assurance activities of the EPC contractors, and the contractors who will in future provide operational services to COK A.S.. The plans also describe the processes to assure that COK A.S. as an organisation is implementing the Project commitments, requirements, regulations and standards.

2.4 EPC CONTRACTOR EHS MANAGEMENT PROCEDURES

EPC Contractors are required to implement their own EHS compliance monitoring and assurance processes which will be outlined in topic-specific Contractor Management Procedures and/or method statements. These form the overarching system for identification of EHS requirements, against which compliance is measured.

EPC Contractor is required to ensure that all requirements from the COK A.S. EHS Management Plans or directly from the Contract between COK A.S. and EPC which are relevant to its activities are included in its topic-specific Contractor Management Procedures, along with method statements and measures proposed for implementation.

The EPC Contractor Management Procedures are the key operational control documents defining their assurance and self-verification processes. The EPC Contractors' Management Procedures and associated supporting subplans/method statements detail their organisations' roles and responsibilities for implementation; technical details including design and equipment; and self-verification processes to comply with the requirements in the corresponding Project Management Plans.

EPC Contractor EHS topic-specific Contractor Management Plans/ Procedures will detail how the EPC Contractor will implement the requirements outlined in the COK A.S. EHS Management Plans or in the instructions included in the Contract with the EPC. Each topic-specific

Contractor Management Plan shall be structured to provide the following information:

- Objectives of the management plan,
- References to other related Project management plans
- References to applicable standards relevant for the management plan
- Identification of Project activities associated with impacts in the field of concern and triggering the implementation of all or part of the management plan requirements
- Description of management practices employed to ensure accomplishment of related commitments
- Roles and responsibilities
- Monitoring and reporting.

The topic-specific Contractor Management Plan to be developed and implemented are summarised in Table 2.2 below.

Table 2-2 EPC Management Procedures and Plans

No.	Project Management Plan	Issues covered*
Environmental Management Procedures & Plans		
1	Biodiversity Action Plan (BAP)	<ul style="list-style-type: none"> • Overarching biodiversity management control document • Project biodiversity management system • Biodiversity identification, management, monitoring and restoration • Provides tree inventory and replanting requirements • Actions to ensure no net loss and preferably a net gain of biodiversity, in line with IFC PS6 requirements • Design inputs on location of animal crossings (assessment and identification of locations) • Alien species management
2	Environmental Management Plan	<ul style="list-style-type: none"> • Noise and vibration levels mitigation and monitoring • Construction dust mitigation and monitoring • Pollution prevention and protection measures Summary of and references to spillage risk assessment in accordance with the UK Design Manual for Roads and Bridges (DMRB) • Design input on spill prevention/location/containment structures around sensitive equipment, installation of appropriate spill cleanup equipment and development of response procedures • Assessment and measures to prevent pollutants to enter pathway at source • Actions to be followed in case pollutants enter the pathway in order to avoid discharge • Pollution prevention and protection measures at hazardous materials storages, such as bunding of storage areas, tank overfilling prevention measures

		<ul style="list-style-type: none"> • Marine contamination prevention aspects. • Waste Management, including: <ul style="list-style-type: none"> • Waste hierarchy (i.e. reduction at source, reuse, recycling, energy recovery, responsible disposal) and green procurement; • Identification and classification of waste; • Waste register; • Waste handling (i.e. collection, segregation and containers, storage, treatment, transport and documentation, disposal); and • Monitoring and reporting. • Resource Management including: <ul style="list-style-type: none"> • Objectives, targets, processes in place for resource efficiency • Water abstraction, conservation, discharge measures • Aggregate management planning • Energy and fuel management • Spillage management, with consideration of the outcomes of the Spillage Risk Assessment performed in accordance with the UK Design Manual for Roads and Bridges (DMRB)
3	Soil Erosion, Reinstatement & Landscape Management Plan	<ul style="list-style-type: none"> • Defines soil erosion controls and associated standards • Temporary and permanent erosion control measures • Inspection and maintenance programme • Reinstatement and revegetation measures and planning
4	Watercourse Crossing Plan	<p>Defines overarching philosophy for works at watercourse crossings including:</p> <ul style="list-style-type: none"> • Watercourse characterization and crossing design • Ecological considerations and constraints • Environmental protection measures • Construction methodologies • Reinstatement and Monitoring
5	Quarries and Associated Facilities Management Plan	<ul style="list-style-type: none"> • EHS screening of associated facilities • Verification of compliance for third-party facilities • Associated facilities EHS assurance • Traffic-related aspects management (for construction traffic to/from associated facilities) •
Social Management Procedures/ Plans		
6	Stakeholder Engagement Management Plan & Grievance Mechanism Procedure	<ul style="list-style-type: none"> • Overarching framework for all stakeholder engagement-related activities • Stakeholder identification; • Stakeholder engagement programme • Monitoring and reporting • Framework for all external stakeholder grievance management • Defines process of managing and resolving grievances • Grievance classifications and definitions

		<ul style="list-style-type: none"> • Defines reporting and monitoring requirements
7	HR & Worker Management Plan	<ul style="list-style-type: none"> • Training and skill development activities; • Employee grievance mechanism; and • Monitoring and reporting • Preparation of the Local Recruitment Procedure to address inter alia the following measures: <ul style="list-style-type: none"> • Promotion of local recruitment at all levels of the Project and facilitating the qualification and recruitment of local candidates, for example with appropriate skills training. • Information to the local population (e.g. through the CLOs of the Project) about opportunities for employment. The recruitment will be monitored and reported by COK A.S.'s HR Department. • Maximise use of Turkish subcontractors and suppliers. Information about work opportunities will be made available to the local population. • Workers' community interaction behavioural code of conduct • Subcontractor employment practices conformance, reporting and monitoring
8	Supply Chain Management Plan	<ul style="list-style-type: none"> • Supply Chain principles, planning, methodology and solutions • Suppliers management
Cultural Heritage Management Procedures / Plans		
9	Cultural Heritage Management Plan	<ul style="list-style-type: none"> • Cultural heritage supervision and management during construction • Chance find training, management and response • Interface and coordination with relevant authorities • Monitoring and reporting of intervention activities to recover and record cultural heritage values
Occupational and Community Health and Safety Management Procedures		
10	Occupational Health & Safety Management Plan	<ul style="list-style-type: none"> • Summary of OHS hazards and risks identification and assessment • High-risk activities identification and management • Occupational Health and Safety Communication and Training Programme which will apply during the Construction Phase across all contractors. The Plan will also apply to the quarries. The Plan will subsequently be updated as appropriate for the subsequent Operation Phase.
11	Emergency Response Plan	<ul style="list-style-type: none"> • Emergency response in event of spills, fire, accidents, earthquake, flood, extreme weather, terrorist threats or attacks etc. • Emergency response equipment/materials requirements • Spill containment and clean-up plan • Procedure for staff and subcontractors to report any incidents and the investigation, remediation and preventive actions taken. • Regular emergency response training including in the

		<p>use of spill response equipment</p> <ul style="list-style-type: none"> • Emergency Communication Procedure including with local communities and authorities
12	Community Health, Safety & Security Management Plan	<ul style="list-style-type: none"> • Sets out the security measures, particularly for the Construction Stage of the Project (e.g. access control by fencing of construction section in the vicinity of settlements or communities).
13	Control of Substances Hazardous to Health Procedure	<ul style="list-style-type: none"> • Management of hazardous substances used at the worksites
14	Transport Control and Site Access Procedure	<ul style="list-style-type: none"> • Road traffic management including: <ul style="list-style-type: none"> • Establishing rights-of-way, site speed limits, vehicle inspection requirements, operating rules and procedures (e.g. prohibiting operation of forklifts with forks in upper position). • Local traffic signage. • Training of Pedestrian workers to work safely around trucks and operating equipment and provide constant warnings to each other in the event of being in risky locations or conditions. • Training of drivers and equipment operators. • Site Access Procedure • Communication protocols and procedures with KGM • Internal monitoring and reporting to COK A.S.
15	Marine Safety for Tower Foundation Procedure	<ul style="list-style-type: none"> • Marine safety for tower foundations • Marine Dredging, Construction & Environmental Design Management, including: <ul style="list-style-type: none"> • Water quality monitoring and management measures • Adaptive management response for marine fauna protection • Ballast water management • Vessel Discharge and Waste Management • Marine pilling-related impacts management • Selection of dredged spoil disposal locations and dredged spoil disposal management • Design of sediment traps and oil-water separators to prevent contaminated runoff from land-side approach roads at the Strait into the marine environment. • Design specifications to allow the use of biodegradable hydrocarbons (i.e. less harmful oils and lubricants) for plant and equipment employed on or close to marine environments. • Spill management and response • Marine dredging and construction monitoring • Marine Traffic Management including: <ul style="list-style-type: none"> • Marine construction operations and marine construction works • Safe navigation and reduce risk of disruption for shipping • Required permits and certifications for marine

		<p>related activities</p> <ul style="list-style-type: none"> • Safe navigation and reduce risk of disruption for boating including recreational, tourism and commercial fishing • Reduce risk of damage to infrastructure and aids to navigation • Vessel strike to marine fauna avoided or minimised and reported to the greatest practical extent. • Navigation measures and limitations during construction • Potential vessel interactions • Vessel management measures • Communication protocols and procedures with Naval Administration authorities • Temporary marine structures and navigation aids • Bunkering and refuelling procedures • Emergency procedures • Internal monitoring and reporting to COK A.S. <p>• Navigation Risk Assessment and Marine Construction Emergency Preparedness and Response</p>
General Management Procedures/Plans		
16	Subcontractors Management Plan	<ul style="list-style-type: none"> • Roles & responsibilities • Includes key requirements extracted from above plans & procedures • Need to develop a H & S & Environmental Management Plan • Establish Health, safety and environmental performances to monitor • Monitoring and reporting to EPC

*- Tentative contents, subject to further amendments

The above topic-specific Contractor Management Procedures and Plans are subject to approval by COK A.S. as a condition for the execution of the construction works and confirmed with Project lenders.

2.5

OPERATIONAL EHS MANAGEMENT FRAMEWORK

This section provides a framework for the EHS Management planning to be put in place for the operational stage of the Project. The EHS Management during operation will ensure that all ESIA commitments applicable at the operational stage of the Project, as provided in the EHS Commitments register appended to this document, are met.

Main activities of the motorway operator will include the following:

- Traffic and Safety operation;
 - Route patrolling;
 - Operation and maintenance of traffic and safety call centre;
 - Emergency operations and traffic management after accident and incident;

- Road closure management for maintenance activities.
- Maintenance;
 - Routine maintenance, cleaning and limited repair of the motorway, interchanges and connecting roads including the related structures, infrastructures, ancillaries, drainage system (asphalt and concrete pavement patching and crack filling, repair and replacement of curbs, repair of fences, repair of guardrails, repair of horizontal and vertical signage, unblocking of drainages system);
 - Maintenance, including watering, trimming and mowing of non-decorative green areas;
 - Winter maintenance with preventive and corrective activities;
 - Operation and routine maintenance, cleaning and repair of the toll related structures, infrastructures, building, facilities, ancillaries;
 - Maintenance of infrastructure (including Bridge and viaducts);
 - Maintenance of energised equipment;
 - Routine inspections for all motorway assets;
 - E&M equipment maintenance.
- Tolling operation;
 - Cash collection and money management in toll lanes (until the cash delivery to cash in transit company at the toll plaza);
 - Operation and maintenance of toll back office, including user data management (vehicle classification, license plate number, toll plaza lane entry / exit corrections, illegal passes, etc.);
 - Traffic management at toll plazas.

It is envisaged that for the management of the EHS aspects associated with the operation stage, a similar approach with the management processes detailed in this ESMP will be considered for the EHS management and performance monitoring of COK A.S. and of the motorway operator.

The motorway operator will be required to attain certification in line with ISO 14001 for Environmental Management and with an internationally-recognised Occupational Health and Safety Management Standard within a timeframe of 2 years from entering the operation stage.

It is currently envisaged that the operation-stage EHS Management Framework will comprise following management plans:

- Environmental and Social Policy;
 - Environmental Management Plan (including monitoring requirements)
 - Waste Management Procedure
 - Wastewater Management Procedure
 - Resource Efficiency Plan
 - Sustainable Landscape Plan
 - Stakeholder Engagement Plan
 - Grievance Management
- Health and Safety Policy Statement
 - Health and Safety Plan

- PPE Use Manual
- Risk Assessment
- Hazard, Risk and Impact Assessment Procedure
- Accident Investigation and Reporting, Near Miss Procedure
- Emergency Evacuation Procedure
- HR Policy
 - Key Organization Plan
 - Recruitment and Career Development Procedure
 - Working Conditions
 - Disciplinary Procedure
 - Training Procedure
- Subcontractor Management Procedure
- Subcontractor OHSE Procedure

The structure of the operational stage management plans will generally follow the requirements applicable for the construction management plans as specified in this ESMP, adapted to meet operation stage risks and issues as needed.

The above-indicated framework is indicative at this stage and will be refined in the frame of the operational readiness planning. The ESMP will therefore be updated in response to this, not later than 6 months before the Malkara - Çanakkale motorway section enters operation.

3.1 OVERALL PROJECT ORGANIZATION

Figure 3-1 COK A.S. Organogram

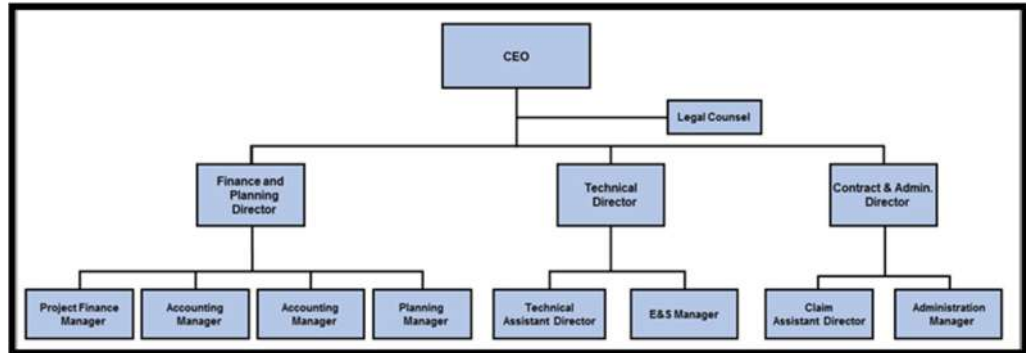


Figure 3-2 EPC Contractor Organogram for Motorway

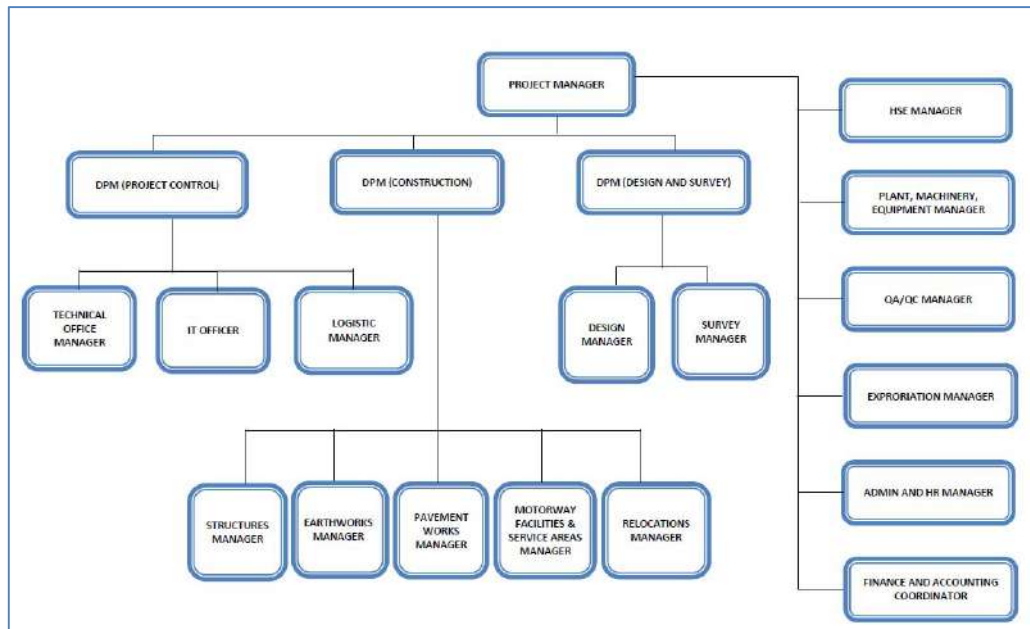
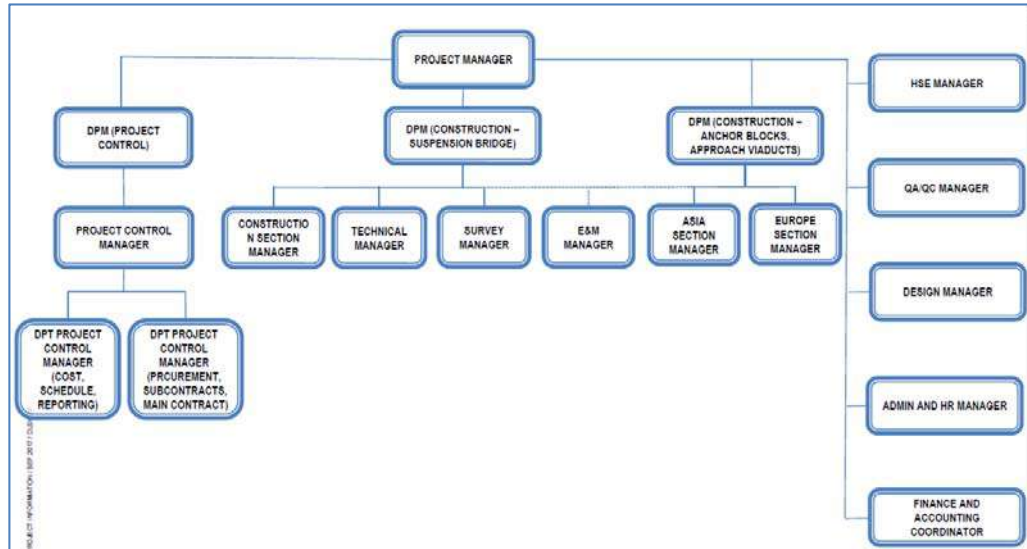


Figure 3-3 EPC Contractor Organogram for Bridge



3.2 COK A.S. EHS ROLES AND RESPONSIBILITIES

COK A.S. is ultimately responsible for ensuring that all construction works activities comply with the Project EHS policies, regulations and standards.

Specific main responsibilities of key COMPANY staff are summarized in Table 3-1 below. Staff job descriptions detailing individual responsibilities will be aligned with the requirements summarised herein.

Table 3-1 Key COK A.S. EHS staff and associated responsibilities

Role	Responsibility
Senior Management	<p>Has overall accountability for the Project including delivery in line with applicable national and international standards.</p> <p>Ensure allocation of sufficient resources for the ESMP implementation including for EHS organisation, permitting, training, equipment and qualified personnel.</p> <p>Ultimate responsibility for ensuring implementation of required corrective actions including in response to identified EHS non-compliances or incidents.</p> <p>Periodical review of the ESMP effectiveness in line with the provisions of this plan.</p>
E&S Manager	<p>Provide EHS resources for implementation of the EHS management system.</p> <p>Ensure that EHS risks will be systematically identified assessed avoided, mitigated and managed, as well as ensuring the EPC Contractors oversight.</p> <p>Manage the EHS team budget and ensure that EHS team’s activities are effectively executed.</p> <p>Provide the Project leadership team with EHS management system advice, guidance and assurance.</p> <p>Communicate the content of this ESMP and any changes to the COK A.S. and EPC Contractor teams and act as the</p>

	<p>focal point to promote implementation, performance monitoring and provide guidance and support.</p> <p>Managing the review and acceptance of EPC Contractor Management Procedures and supporting EHS method statements plans and processes.</p> <p>Inform EPC Contractors on EHS responsibilities as defined in this plan and detailed in the Project Management Plans and ensure these are understood and implemented throughout all construction stages.</p> <p>Act as focal point for EPC Contractor oversight in accordance with this ESMP.</p> <p>Ensure that all EHS-related incidents are reported and dealt with effectively and lessons learned are shared in accordance with the COK A.S. incident reporting procedure.</p> <p>Oversight of the EPC Contractors' activities to ensure they align with Project EHS management system requirements and with the EPC Contractor Management Procedures and supporting sub-plans and method statements.</p> <p>Coordination of the EHS field' activities at the construction sites.</p> <p>Support EHS and construction field staff through assistance with pre-construction surveys, document review, incident investigation and technical advice.</p> <p>Organizing and participating in inspections, reviews and audits of the EPC contractor performance with respect to the requirements of this ESMP.</p> <p>Perform field-based EHS oversight of the EPC Contractors, monthly or more frequently, as required.</p> <p>Ensure LACRP development, implementation and monitoring</p> <p>Responsibility for maintaining systematic records and evidence demonstrating compliance with Project standards.</p> <p>Responsibility for reporting to Project lenders and their advisors in line with the provisions of this ESMP.</p> <p>Responsibility for operation-stage EHS aspects management.</p>
<p>Community Liaison Officers</p>	<p>Act as liaison between the community/stakeholders and COK A.S. along the motorway route and maintain positive relationship with them.</p> <p>Provide timely information to communities on all project works, in respective areas through regular meetings with stakeholders and ensure that long term relationships are not negatively impacted.</p> <p>Provide information on potential issues with local communities and stakeholders and contribute in implementing specific measures to prevent and mitigate risks</p> <p>Take active role in the in the identification of community needs and assist in the decision process regarding COK A.S. community investment programme. Contribute to the successful implementation of COK A.S. community investment programme.</p> <p>Identify key stakeholders, requiring engagement in the frame of COK A.S. stakeholder engagement</p>

	<p>processes/activities and update regularly the stakeholder mapping in response to stakeholders activities and their relationship with the Project.</p> <p>Monitor local development that has the potential to impact Project activities, and report to the E&S Manager.</p> <p>Responsible for implementing the Grievance Mechanism.</p> <p>Responsible for ensuring grievance training, communication and monitoring.</p> <p>Responsible for verifying EPC Contractors compliance to grievance commitments.</p> <p>Responsible for grievance reporting.</p> <p>Responsible for managing grievance data quality and ensuring completeness grievance records.</p> <p>Support the project team to receive and define grievances and forward them to E&S Manager and assist in closing the grievances as required.</p> <p>Follow up on grievances resolution process.</p> <p>Ensure that stakeholder engagement activities are documented and evidence (e.g. Minutes of Meetings) are kept on file.</p> <p>Contribute and monitor public engagement and outreach activities of the EPC Contractors, as per approved plans and COK A.S.' stakeholder engagement guidelines.</p> <p>Report on all activities performed to the E&S Manager on weekly basis and agreed format.</p>
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3.3

EPC CONTRACTOR EHS ROLES AND RESPONSIBILITIES

It is EPC Contractor`s responsibility to ensure that EHS compliance is achieved according to the requirements and processes defined in this ESMP. In attaining this objective, the EPC Contractor establishes and maintains through its own EHS Management System a documented process to identify risks and impacts, implements adequate management measures to mitigate these in line with the Project Requirements, Regulations and Standards provided in section 2.1 of this ESMP. EPC Contractor EHS monitoring of its own activities and its subcontractors EHS performance is referred to as 'self-verification' and forms the first level of EHS compliance monitoring under this ESMP.

The EPC Contractor is responsible for:

- Self-verification of its own compliance by maintaining a system to manage EHS aspects and impacts in line with COK A.S. and its own management system requirements;
- Ensuring that all EHS non-conformances and incidents are reported and dealt with effectively and that lessons are learned;
- Ensuring their organizations have adequate resources and expertise for EHS compliance monitoring and control to meet the ESMP requirements;
- Keeping COK A.S. fully informed of any EHS issues;
- Recording and reporting monitoring observations, required actions and raising non-conformance reports where appropriate;

- Instructing own and subcontractor staff in their responsibilities with respect to compliance assurance and incident reporting and response;
- Cooperating with COK A.S. in relation to EHS compliance assurance activities;
- Participating in joint inspections, performance reviews and audits as required by COK A.S.;
- Providing COK A.S. with access to monitoring records (including all relevant documentation and databases) as required;
- Ensuring adequate expertise, planning and resources are in place to appropriately identify EHS risks sufficiently in advance of construction, in order to ensure compliance;
- Identifying EHS risks as part of its planning processes and through implementation of appropriate mitigation measures and communicating these to its workforce;
- Reporting to COK A.S. on EHS performance, including KPIs on weekly and monthly basis in a commonly agreed format;
- Maintaining and reporting updated registers to COK A.S. that capture the range of compliance monitoring and assurance information necessary to demonstrate that Project EHS standards are being met during construction works execution.

In order to ensure implementation of the above, the EPC Contractors are required to structure their organizations to include sufficient and adequately qualified EHS staff. The EPC Contractor is responsible for determining the required number of EHS personnel to ensure that Project EHS policies, regulations and standards are met throughout works execution. Furthermore, the EPC Contractor is responsible to ensure that their subcontractors implement throughout their Project activities the requirements set forth in this ESMP and subordinated plans. For this purpose the EPC Contractor is required to put in place adequate, documented processes for supervision and monitoring of subcontractor responsibilities.

EPC Contractor's EHS team is to include appropriately qualified personnel covering following roles (individual positions may combine multiple roles as appropriate):

- EHS Manager(s) (responsibilities including Environmental, Social, Health and Safety, and Cultural Heritage aspects);
- EHS Supervisors (multiple positions as necessary, e.g. environmental specialist, ecological clerk of works, archaeologists etc.);
- Health and Safety Supervisors (multiple positions as necessary);
- Community Liaison Officers (multiple positions as necessary);

In case COK A.S.'s monitoring of EPC Contractor's EHS performance indicates insufficient EHS oversight, compliance assurance resources or practices, COK A.S. is entitled to enforce required corrective actions on the respective EPC Contractor. This may include requiring the EPC Contractor to allocate additional EHS staff and resources.

EHS Controls in place during the Project construction stage are based on an EHS compliance assurance (monitoring and reporting) process to ensure that EHS Project policies, regulations and standards are met.

COK A.S.'s management controls focus on (i) the implementation of the Project's EHS Management System described in this ESMP, (ii) implementation by the EPC Contractor of the Project Policies, Regulations and Standards, (iii) oversight of EPC Contractor activities and (iv) Compliance assurance to verify that the works are performed according to the Project Policies, Regulations and Standards and in line with EHS management system.

This EHS (including environmental, occupational health and safety, labour and working conditions, socio-economic, community safety and cultural heritage aspects) compliance assurance process is implemented at two levels:

- **First level: EPC Contractor Self-Verification programme** (inspections, monitoring, reporting) to demonstrate compliance with EHS policies, regulations and standards, and to provide evidence that it is meeting its' obligations. Includes oversight of subcontractors, including those performing activities off-Project sites (at associated facilities).
- **Second level: COK A.S. Oversight and Assurance activities.**
Oversight is performed by COK A.S. EHS staff to ensure that COK A.S. own activities and the self-verification conducted by EPC Contractor has been carried out sufficiently. This includes review of EHS reports, documentation, monitoring data, procedures & plans, undertaking formal inspections and attendance of meetings with EPC Contractors to drive performance and raise issues.
Assurance activities are performed by personnel (or specialized service providers) not directly involved in the works being checked, to provide an additional layer of assurance beyond self-verification and oversight and measure the compliance of Project activities. Assurance process comprises targeted audits and formal reviews. Assurance activities are typically detailed and focused upon defined risk areas or guided by feedback from the results of the self-verification and oversight activities.

In addition to the above, independent audits of compliance with Project Requirements, Regulations and Standards and including both COK A.S. and EC Contractor performance are performed periodically, typically on annual basis.

The controls put in place to manage, monitor, measure and report compliance with Project EHS policies, regulations and standards during the Project construction stage are outlined in this ESMP section.

4.1

EPC CONTRACTOR SELF-VERIFICATION PROGRAMME

EPC Contractor is required to operate an Environmental and Social Management System (ESMS) in alignment with the principles of ISO14001, which requires self-verification of compliance in accordance with the plan-do-

check-review cycle (ESMS accreditation to ISO14001 although recommended is not a requirement).

As part of its construction works planning EPC Contractors are required to prepare and implement topic-specific Contractor Management Procedures and/or method statements. These EPC Contractor EHS management planning documents will detail how the EPC Contractor will meet and comply with the specific Project EHS (including environmental, occupational health and safety, labour and working conditions, socio-economic, community safety and cultural heritage aspects) policies, regulations and standards through a self-verification programme including:

- Undertaking Pre-construction Surveys and EHS assessments to identify and manage EHS risks;
- Performing EPC Contractor EHS inspections and audits;
- Performing EPC Contractor EHS Monitoring;
- EPC Contractor non-conformance and incident notification and response;
- EPC Contractor EHS Action Tracking System;
- Undertaking design reviews to ensure incorporation of ESIA and subordinate-plan mitigation commitments, and
- Creating a functioning interface between designers, construction managers, and EHS functions to ensure integration and delivery of ESIA commitments.

4.1.1 *EPC Contractor Pre-Construction Surveys*

Prior to initiating construction works at a specific Project location, the EPC Contractor is required to perform pre-construction surveys to identify EHS risks and support mitigation planning and implementation as informed by and aligned with ESIA Commitments. EPC Contractor is responsible for ensuring that planning and execution of pre-construction surveys are performed by appropriately qualified staff with sufficient time in advance of construction initiation. Timing of pre-construction surveys execution is to allow confirmation of baseline conditions, identification of aspects triggering construction sites layouts adjustment and development/adjustment of site-specific mitigation prior to construction works initiation. Tree inventories required in line with Project Requirements, Regulations and Standards are to be performed at this stage.

The scope of pre-construction surveys are defined on a case by case basis with consideration of site specific monitoring requirements or applicable EHS constraints identified and are to be agreed with COK A.S. before initiation.

The Pre-construction surveys include assessment of EHS risks and identify mitigation measures or actions necessary to appropriately avoid or mitigate potential EHS impacts. EPC Contractors EHS team is required to communicate the findings of pre-construction surveys to other members of the construction team to enable implementation of any site-specific construction approach and mitigation.

4.1.2 *EPC Contractor Inspections and Audits*

To provide assurance that the provisions of the topic-specific management procedures/method statements are implemented effectively, EPC Contractors are required to implement a programme of documented inspections and audits at Project sites and Associated Facilities including own activities and those performed by subcontractors.

This includes undertaking walk-around inspections during construction works execution to visually monitor that mitigation measures are implemented, undertaking joint inspections with COK A.S. using checklists, and engagement with project affected parties, stakeholders and regulators. These activities will include inspection of subcontractor labour and working conditions aspects against Project Requirements, Regulations and Standards with quarterly frequency.

EPC Contractor internal audits will be performed in line with each EPC Contractor's management system procedures as approved by COK A.S.. As a minimum EHS internal audits are to be performed by the EPC Contractor on annual basis. The audits are to be performed by an interdisciplinary team of appropriately qualified environmental, social, cultural heritage auditors. COK A.S. EHS staff may join the audit team and participate in the EPC Contractor's internal audits.

4.1.3 *EPC Contractor Action Tracking, Non-Conformance and Incident Response and Notification System*

In response to any issues, observations, non-conformances and incidents the EPC Contractor is to propose appropriate corrective actions and record these (including responsibilities and timescale for completion) in its own EHS (including environmental, occupational health and safety, labour and working conditions, socio-economic, community safety and cultural heritage aspects) Action Tracking System (ATS).

COK A.S. EHS management staff will review EPC Contractor's ATS on a regular basis and will follow-up on progress and confirm actions closure.

Non-conformances identified as result of inspections, monitoring and audits performed are recorded by EPC Contractor as actions to be addressed within their own management systems and reported to COK A.S. in monthly reports as a minimum.

EPC Contractor is required to implement own EHS Incident Reporting and Investigation procedures. All EHS incidents and near misses will be notified to COK A.S.. Incidents will be notified immediately as they occur, while near misses will be reported on weekly basis.

COK A.S. E&S Manager will review and qualify non-conformances and incidents reported by EPC Contractor. COK A.S. E&S Manager will regularly meet relevant EPC Contractor representatives to review the Action Tracking System and status of actions progress and closure.

4.1.4 *EPC Contractor Monitoring and Reporting*

The procedures for monitoring implementation and outcomes of the EHS mitigation measures, EHS KPIs and environmental and social monitoring are defined by each EPC Contractor in their topic-specific management procedures/method statements. The monitoring frequencies, parameters, methodology and duration are determined based upon site activities requiring monitoring, which is assessed on a case by case basis dependent upon construction activity type and location.

EPC Contractor is responsible for reporting monitoring results to COK A.S. on a monthly basis.

4.2 *COK A.S. EHS OVERSIGHT AND ASSURANCE PROGRAMME*

4.2.1 *COIKIYI EHS Oversight (Monitoring)*

EHS oversight is aimed at monitoring construction works activities to determine whether environmental, occupational health and safety, labour and working conditions, socio-economic, community safety and cultural heritage mitigation measures implemented by EPC Contractors are effective (i.e. are avoiding and minimising the impacts as intended, or whether work practices require revision).

During construction stage, EHS oversight monitoring is undertaken by the COK A.S. E&S Manager through ongoing review and follow-up on EPC Contractor's weekly and monthly reports and on non-conformance/incident reporting, as well as by performing inspections of the construction work sites or Project-affected areas.

The EHS oversight inspections are performed regularly, on monthly basis, and are intended to highlight key EPC Contractor conformance aspects, and their outcome is used to determine the required actions. In addition to the regular monthly inspections, unscheduled inspections (spot-checks) of critical/key Project areas are performed as needed. The locations and timing of the unscheduled inspections are determined based on the ongoing Project activities and issues, as informed by the EPC Contractor weekly/monthly reports and the non-conformance/incident reporting.

The EHS oversight is aimed at addressing all Project EHS aspects and worksites and ensure that each of them are visited yearly as a minimum.

Checklists may be used in support of the field inspections which may be organised based on specific EHS topics addressing key aspects associated with the construction works activities being inspected.

Inspections' observations and findings are discussed with EPC EHS representatives to determine and agree on any required actions.

COIKIYI EHS oversight (monitoring) reports are generated as simple records to include:

- indication of the construction works construction site inspected;

- indication of the construction activities inspected;
- observation notes providing description of positive aspects, good practice or issues/non-compliances identified;
- photographic evidence of the observations made/issues identified.

Where EHS oversight (monitoring) inspections identify issues or non-conformances, the remedial actions required in response are discussed and agreed with the EPC Contractor and recorded into the EPC Contractor's ATS.

4.2.2 COK A.S. Regular EHS Oversight Reporting

A brief EHS oversight report is provided by the E&S Manager to COK A.S. Leadership on quarterly basis. The report summarises the key issues and challenges during the reporting period as resulted from the EHS oversight inspections and the review of the EPC Contractors' EHS reports and ATS.

Regular reporting is intended to keep COK A.S. Leadership informed on EHS aspects, so that direction and feedback can be provided to EPC Contractors and leadership support obtained for addressing key and more strategic issues at appropriate decision levels as applicable.

4.2.3 COK A.S. EHS Assurance Audits

Environmental, social, health and safety audits of each EPC Contractor are performed on annual basis or after specific construction works delivery milestones are attained by the EPC Contractor (e.g. 0 - 50%, 50-100% construction works execution).

The EHS Assurance Audits are conducted primarily by COK A.S. (or by COK A.S. shareholders') staff independent of the activities audited, or by contracted specialised third-party services providers to provide assurance of oversight and self-verification activities.

The EPC Contractors are formally notified about the EHS audits and their scope which may include but not be limited to:

- EPC Contractor EHS organization/staffing;
- EPC Contractor EHS documentation;
- Implementation by EPC Contractor of the ESMP and subordinate topic-specific management plans, method statements and specific EHS Procedures;
- EHS training and inductions;
- EHS Key Performance Indicators (KPIs);
- EHS Non-conformance and incident reporting, tracking and closure.

Audit protocols are developed based on the defined scope and used by auditors for guidance and for recording audit observations including good practice and non-conformances.

Audit outcomes are summarised in reports and formally communicated to and discussed with the EPC Contractor. Any required corrective actions are agreed with the EPC Contractor and recorded in their ATS and/or Non-conformance Reporting system as appropriate. Progress in addressing the audit findings is followed up on a regular basis to close the open and pending actions and reported monthly.

4.2.4 *Key Performance Indicators (KPIs)*

COK A.S. and its EPC Contractors will track and monitor various performance indicators both leading and lagging so as to identify potential trends in environmental, safety and social performance.

4.2.5 *COK A.S. EHS Reporting to Project Owner*

COK A.S. will submit to the KGM on monthly basis environmental & social, health and safety (ESHS) activity reports summarising all environmental, social health and safety initiatives implemented in relation to the execution of the works during the reporting period.

The monthly ESHS activity reports are concise documents in a pre-defined format agreed with KGM, and submitted within 10 working days from the last day of the previous month. Moreover, the KGM consultant will continuously supervise the COK A.S.'s activities in the field.

4.3 *ENVIRONMENTAL MONITORING*

A summary of the environmental monitoring programme requirements put in place for the Project is provided in Annex E of this ESMP. The environmental monitoring aspects (including details on each monitoring parameter, methodology, timing of monitoring etc.) are further detailed in each topic-specific management plan subordinated to this ESMP.

4.4 *NON-CONFORMANCE REPORTING AND CORRECTIVE ACTIONS*

COK A.S. has established a non-conformance management system, as documented in the Non-conformity Management Procedure. Non-conformances are unapproved (by COK A.S.) deviations from COK A.S. EHS Specifications or Standards, COK A.S. or EPC Contractor Management Plans. These are typically identified through the oversight and assurance process (e.g. daily monitoring, oversight inspections and audits). Non-conformances are classified using a 5-level severity scale, aligned with the overall Project, Accident and Event Reporting Procedure ; see Table 4-1 below.

Table 4-1 Non-Conformance Categories and Associated Corrective Actions

Non-conformance Levels	Description	Action Triggered
	Any deviation from the Project commitments or activity performed in non-conformance with contractual requirements, Project Standards and Specifications, COK A.S. or EPC Contractor Management Plans, or activities performed outside of ESIA scope which may result in:	
Level 5	An incident of catastrophic (5) severity	<ul style="list-style-type: none"> • Immediate corrective action required to correct or stop the on-going non-conformance and implement mitigation.
Level 4	An incident of severe (4) severity	<ul style="list-style-type: none"> • Immediate corrective action or site-specific attention required to correct or stop the on-going non-conformance and implement mitigation.
Level 3	An incident of significant (3) severity	<ul style="list-style-type: none"> • Corrective action or site-specific attention to correct or stop the on-going non-conformance and/or to prevent the occurrence of environmental and social impacts.
Level 2	An incident of moderate (2) severity	<ul style="list-style-type: none"> • Corrective or preventive action or site-specific attention to ensure compliance with Project Standards, COK A.S. and EPC Contractor Management Plans.
Level 1	An incident of negligible (1) severity	<ul style="list-style-type: none"> • Corrective or preventive action or site-specific attention to ensure compliance with Project Standards, COK A.S. and EPC Contractor Management Plans.

All EHS non-conformances are tracked through to closure by the Main EPC Contractor’s EHS team, presented and discussed in monthly EPC Contractor EHS and COK A.S. cross functions construction meetings. The EPC’s NCR (Non-Conformity Report) system will be based on the following principles (subject to further updates and revisions, by case):

Non-conformances level 1-3 are addressed through a Works Improvement Notices (WIN) process. WINs are intended to resolve minor non-conformances without elevation to a formal non-conformance report. When issues are raised by WINs are not resolved in a satisfactory time frame, or if multiple WINs are issued that show a trend of numerous instances of a particular type of non-conformance, COK A.S. or Main EPC Contractor may elevate a WIN to a formal non-conformance report.

Non-conformances level 4-5 are entered into the NCR System and are subject to the following steps sequence:

1. *Initiate* – The originating person submits the Non-Conformance Report by providing concise non-conformance description, indication of departed requirement/ procedure and identification of location/ area where the non-conformance occurred. EPC Contractor will inform COK A.S. promptly.
2. *Response* – The EPC Contractor lead defines the Root Cause, Proposed Corrective Actions and Actions to Prevent Reoccurrence.
3. *Review* – Assigned Main EPC Contractor reviewers confirm, or comment on, the proposed corrective actions.
4. *Implement* – The EPC Contractor lead finalizes the non-conformance action plan and initiates implementation according to set due dates. As actions are implemented, the EPC Contractor lead enters in the system relevant supporting documentation confirming implementation.
5. *Close Out* - EPC Contractors reviewers confirm, validate and close out non-conformance and inform COK A.S. promptly

4.5 *INCIDENT REPORTING AND INVESTIGATION*

Incident management and associated reporting are addressed by a specific procedure EHS Accident and Event Reporting Procedure

Incidents are classified according to the 5-level severity scale provided in Table 4-1 above.

4.6 *EXTERNAL REPORTING*

COK A.S. will prepare an annual report to the public on environmental, health and safety performance and implementation of the action plans and grievance procedure. The annual reports will be disclosed on the COK A.S. website.

In addition, COK A.S. commits to following external reporting:

- Statutory Notifications and Reporting

COK A.S. will report to Turkish regulatory bodies as required in Project permits and permitting documentation.

- Incident Notification and Reporting

All environmental and social incidents will be appropriately documented, notified and reported in accordance with established procedures as indicated in previous sections of this ESMP.

Incident notification and reporting to relevant Turkish regulatory bodies will be performed in line with applicable legislation in force and as stipulated in permits and licenses.

COK A.S. will notify Lenders Group of incidents pursuant to the terms and conditions agreed upon in the Finance Agreements.

As stated within the ESIA and as usual for projects of this scale, further design development / changes in construction methods, including the detailed design necessary for the construction of the road and bridge, is to be undertaken.

This Change Management (CM) Procedure sets out how the environmental and social implications of the design and construction methodology development will be assessed. The assessment of these aspects will aim to ensure that adequate mitigation is adopted to minimise and avoid effects where any deviations to the scheme described in the ESIA are proposed. The procedure detailed herein represents a sub-process of the overall Change Management Procedure applicable to all Project changes (e.g. financial, construction/technical, schedule aspects). The procedure set out in this document describes how the environmental and social aspects are to be assessed, and fully integrates into the overall decision-making process for reviewing design changes / construction methods.

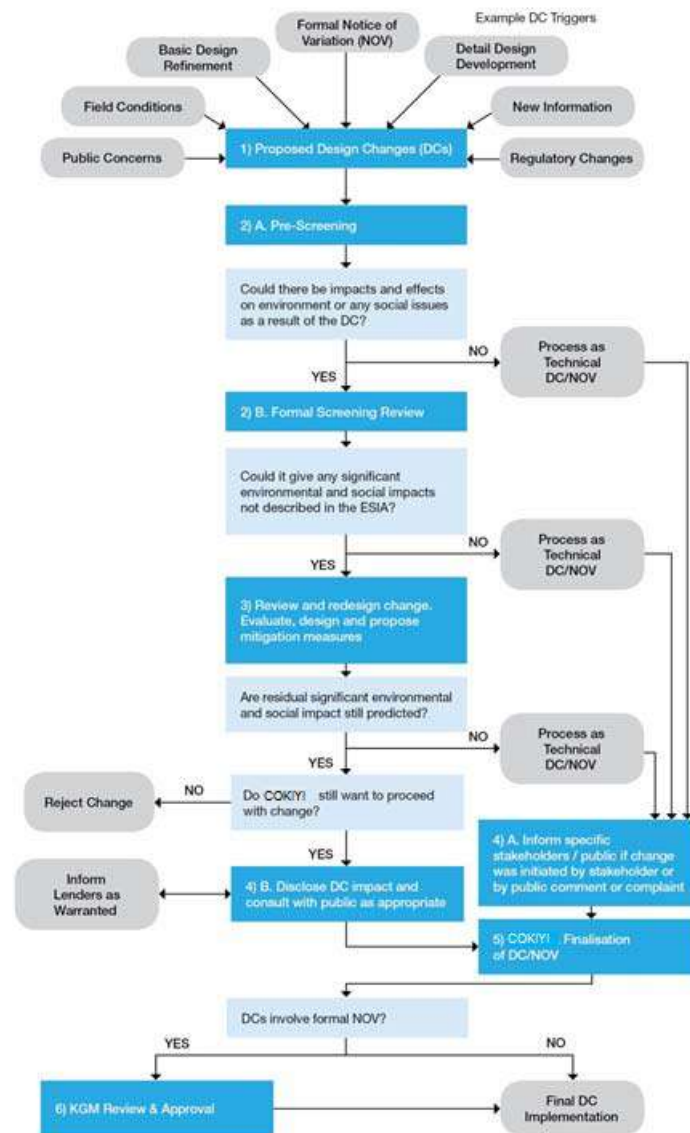
Environmental aspects include air quality, noise & vibration, water resources, land use, archaeology, cultural heritage, and biodiversity; social aspects include labour and working conditions including OHS, community impacts such as public health, safety, security, gender equality, cultural heritage, and involuntary resettlement.

As is typical for such a large infrastructure project, it is expected that there will be changes required to the many design / construction methods aspects of the Project. Many Changes will be of a purely technical nature with little/no ESIA-relevance, and many other Changes are expected to fall within the areas and issues already covered by the ESIA and the ESMP and LACR Framework (e.g. change in areas of property expropriated from already-affected landowners, layout of facilities at the rest areas). It should be kept in mind that Changes can also have significant positive implications for the Project.

An overview of the CM Procedure for Environmental and Social assessment topics is provided in the figure below, and a description of the key phases is also provided.

Figure 5-1

Overview of the CM Procedure for Environmental and Social assessment



* design change in the figure above refers to both design and construction methodology development

5.1

TRIGGERS/SOURCES FOR CONSIDERATION OF CHANGE

Potential DCs can be triggered at various stages of the Project implementation (e.g. Planning/Detailed Design, Construction, Operation) and by the various organisational parties, e.g.:

- Basic design refinement, e.g. by COK A.S. engineers/planners;
- Detailed design development, e.g. by the Contractors on KGM-approved designs;
- Changes in construction methodologies;
- Field obstacles during construction;
- Results of further field surveys (e.g. archaeology) and monitoring;
- Comments/concerns submitted by public/stakeholders/lenders;
- Changes in regulations/comments by regulatory bodies;
- Requests from KGM.

Regardless of the trigger source, any potential DC must formally be processed through the DCM Procedures.

5.2 CHANGE PRE-SCREENING AND SCREENING

5.2.1 Pre-Screening

EPC Contractor will be reporting to COK A.S. any change in design or construction methodology, will perform the Change “Pre-Screening” and provides this information as part of the monthly reports. Pre-Screening is performed by EPC Contractor’s Environmental Experts with support from the Design Team or subcontracted experts as needed.

COK A.S. is reviewing and provides comments/signoff of the Pre-Screening report. This will ensure that proposed Changes that are clearly of no relevance with respect to environmental or social topics - or having very minor/deminimis implications for the Project implementation - will not be subject to further Screening. These pre-screening results will be provided to COK A.S. through EPC Contractor’s monthly reports. The change will be processed as a Technical Design/ Construction method Change/ Notice of Variation (NOV).

5.2.2 Screening Review

Upon receiving the Pre-screening information, COK A.S. undertakes a desk-based “Screening-Review” for any proposed Changes that in the opinion of COK A.S. have the *potential* to give rise to new or additional significant impacts (positive or negative) which differ to those as presented in the ESIA Report. The Screening will cover the following criteria *inter alia*:

- a) Compliance with national, international and Lenders environmental and social standards;
- b) Compliance with relevant health & safety regulations and standards;
- c) Compliance with EU standards;
- d) Compliance with ESIA-related legal standards and permitting requirements;
- e) Any new impacts on current stakeholders and impact to new/additional stakeholders (i.e. beyond that already considered in the ESIA/LACR Framework);
- f) Any expansion of Project footprint requiring additional land take and expropriation or (i.e. beyond that already reflected in the ESIA/LACR Framework);
- g) Impacts on cultural heritage/ Archaeology; and
- h) Any new/different ESIA-related item/topics that are not already appropriately addressed in the ESIA Package.

The Screening will be performed by/under the direction of the COK A.S. E&S Manager, with involvement as warranted of other internal COK A.S. staff and EPC Contractor Environmental Expert/Design Team, and/or with support from external specialised Consultants (e.g. ESIA consulting team). Screening

results will be logged and recorded in a suitable format (to be determined by COK A.S.). The Screening results will be available for review by the Lenders and their Advisors.

The potential outcomes of the Changes Screening can be grouped as follows:

No Significant Environmental and/or Social Impacts - where there are no significant implications or additional negative impacts identified as compared to the items addressed in the ESIA Report and a change does not trigger additional/new mitigation measures. As such, the screening results will be logged and the NOV (Notice of Variation) will be further evaluated and processed on basis of the technical, cost and other non-ESIA factors.

Significant Environmental and/or Social Impacts - where there are significant or potentially significant implications with respect to ESIA-related topics that cannot be readily quantified or mitigated and were not already addressed in the ESIA (and/or pose significant reputational exposure). In this case the screening results will be logged and a "Change ESIA Review" will be undertaken (see below).

5.3 *REVIEW AND REDESIGN CHANGE*

For those proposed Changes for which the Screening suggests significant/potentially significant ESIA-related impacts, the COK A.S. E&S Manager will undertake appropriate consultation internally and with the Consultants regarding any further mitigation or other measures (including further design development) needed to comply with the relevant ESIA standards. The determination of "significance" of a potential impact will be largely based on the corresponding definitions in the ESIA for the relevant environmental and social topics.

If no further residual significant environmental and social impact is predicted the change will be processed as a Technical Design/ Construction Method Change / Notice of Variation.

5.4 *STAKEHOLDER ENGAGEMENT*

5.4.1 *Inform specific stakeholders*

COK A.S. will directly inform, about their decision, specific stakeholders in writing where the design change process was initiated on their initial suggestion.

5.4.2 *Disclose Results and Consult Affected Stakeholders*

If the Change /NOV results in significant environmental and/or social impacts that cannot be readily quantified or mitigated and/or affect additional stakeholders (as compared to stakeholders already involved in the ESIA process), and COK A.S. still want to proceed with change then further disclosures on the Project web-site (plus local postings, flyers etc. as appropriate) and local public consultation may be undertaken if warranted with

the directly affected stakeholders. The type and extent of disclosure/consultation will depend on the severity and scope of the Change impacts, with the intent being to ensure that the objectives and spirit of the public engagement of the ESIA process are maintained. A time-line of not more than 15 days will be proposed for receipt/inclusion of any feedback as appropriate on a case-by-case basis.

Any obligatory regulatory consent and other formal procedures will also be completed during this stage.

COK A.S. will notify Lenders Group of Changes with significant environmental and social impacts or requiring public consultation within a timeframe pursuant to the terms and conditions agreed upon in the Finance Agreements. Upon agreeing on the reporting process with the Lenders Group, this document will be revised by COK A.S. to indicate the agreed change notification process.

A summary of relevant changes and associates EHS impacts mitigation will be also included in the annual reports disclosed on the COK A.S. website as indicated in section 4.5 of this document.

5.5 *FINALISATION OF CHANGE IMPACT UPDATE AND CHANGE/NOV*

COK A.S.'s E&S Manager) , with the assistance of the Consultants, will review and compile any feedback received from Lenders, Public and other parties on the Change Impact Update and will prepare a final version that includes due consideration of the feedback and comments received. On a case-by-case basis, further discussions of the intended mitigation measures may be needed with stakeholders during the finalisation process.

As applicable and appropriate, specific feedback can be given to the stakeholders that have raised queries comments with respect to the Change.

5.6 *SUBMITTAL TO KGM FOR APPROVAL (IF RELEVANT)*

If the original Change is related to a KGM-approved design/change of the construction method, by case, , then the formal NOV will be prepared, including relevant measures/considerations from the Change Impact Update, and submitted to KGM for their review and approval. If the Change is not related to a KGM-approved design/ construction method, by case, then COK A.S. will adapt the Change Impact Update to the current draft design stage/ construction method and further proceed as per the internal process.

Finally, COK A.S. will implement the agreed Changes.

5.7 *SUMMARY*

The intent of the CM Procedures for E&S assessment includes the following key principles:

- (1) The proposed CM Procedures for E&S related issues will be integrated by COK A.S. into the overall CM Procedures of the Project

- (2) The Procedures will begin to assess design changes / construction method changes during the development process
- (3) Significant proposed Changes must be reviewed for their E&S-relevance, and appropriate mitigation measures must be developed
- (4) Proposed Changes that are irrelevant/insignificant get flagged in the internal "pre-screening" by COK A.S. and are not included in the further Procedures
- (5) Potentially significant E&S-relevant Changes undergo formal Screening and further change Review/evaluation (with consultants and other experts) as warranted on case-by-case basis
- (6) All Changes screening results are logged, and can be reviewed by Lenders if desired
- (7) The first preference for minimization of potential negative E&S impacts will be to review the proposed Change for alternative designs/ construction methods to avoid the impacts
- (8) For any significant Changes for which additional mitigation measures are warranted, a Change Impact Update will be prepared and submitted to the Lenders
- (9) Specific stakeholders will be directly informed in writing where the change process was initiated by them
- (10) On case-by-case basis, further public information and potentially consultation will be implemented
- (11) Proposed Changes stemming from approved KGM designs must be submitted to KGM for final approval.

In addition to the above, COK A.S. will undertake monthly reporting of the Changes (and related Screening Results and Change Impact Updates etc).

COK A.S. is committed to ensure that EHS training is delivered to all staff as required for delivering their roles. In the frame of the recruitment process, future COK A.S. staff is verified for competency and experience. Following employment with COK A.S. the staff receive ongoing EHS, initially in the form of the EHS induction training to ensure delivery of the Project health, safety, environmental, socio-economic and cultural heritage expectations. In addition, COK A.S. staff further undertake any specific EHS training commensurate with their roles. This training programme is aligned with commitments and the international best practice.

EPC Contractor shall ensure that all construction works employees (own and subcontractor staff) are adequately qualified and have the environmental, health and safety, socio-economic and cultural heritage knowledge and skills required for the execution of their work duties.

Prior to the commencement of the work, EPC Contractor shall submit a Training Plan identifying specific training requirements against each job title for review and acceptance by COK A.S..

The Training Plan is to be based on an analysis of training requirements and should comprise:

- an induction training programme to be delivered to all personnel in the workforce (own and subcontractor staff), vendor representatives and site visitors
- general and job/task-specific training as needed for the performance of the duties to which the person (own and subcontractor staff) is assigned to.

It is recommended that the Training Plan will include a matrix of training requirements showing the training frequency and the interval between refresher training sessions and including:

- general training;
- job/task-specific training;
- toolbox talks.

The Training Plan is also to define the mechanism in place to ensure that training is timely delivered and the training programme is effective. For this purpose the EPC Contractor is to perform regular evaluations throughout the construction works period to ensure that the Training Plan has achieved its objectives i.e. that all staff (own and subcontractor employees) are suitably qualified, competent and fit for their job duties. The frequency and timing of such evaluations is to be determined by the EPC Contractor and subject to COK A.S. approval.

Management Review is last element of the ESMP Cycle (Figure 1), closing the adaptive management feedback loop. COK A.S. and EPC Contractor management reviews are undertaken at several levels of the organisation and include the following:

- COK A.S. performance reviews.
- EPC Contractor EHS functional and project cross functional reviews.
- Project management leadership meetings.
- Weekly and monthly EHS function meetings.

COK A.S. senior management periodically review the overall effectiveness of the EHS E&S management system, annually as a minimum. The purpose of the EHS Management Review is three-fold:

- To provide management with a summary of EHS performance over the year, including:
 - Non-conformities and corrective actions.
 - Monitoring and measurement results.
 - Audit results.
 - Shareholder and stakeholder feedback and concerns.
 - Issues concerning external stakeholders.
 - Adequacy of EHS resources.
 - Process performance.
 - Regulatory changes.
 - EHS incident trends, response and reporting.
- Identify opportunities for continual improvement.
- Summarise the significant E&S risks and their proposed mitigation, in the following period.

The annual EHS Management Review is used to develop the Annual EHS Activity Plan and targets for the following year to identify:

- Continual improvement opportunities.
- Any need for changes to the EHS Management System, including resource needs.

ANNEX A NATIONAL LEGISLATION AND PERMITS

Subject	Name of the Legislation
Land Use and Soils	
Agricultural lands	Law on Soil Protection and Land Use
	Implementation Regulation on Soil Protection and Land Use
	By-law on Protection and Use of Agricultural Lands and Land Consolidation
	Law on Improvement of Olive Cultivation and Budding of Wild Species
	Regulation on the Improvement of Olive Cultivation and Budding of Wild Species
Forest lands	Forestry Law
	Implementation Regulation of 16 th Article of the Forestry Law
Pasture lands	Pasture Law
	Pastures Regulation
Soils	Regulation on the Control of Soil Pollution and Lands Contaminated by Point Sources
Rehabilitation	Regulation Concerning the Rehabilitation of the Lands Disturbed by Mining Activities
Socio-economics	
Land Acquisition	Expropriation Law
	Regulation on the Exchange of Treasury Lands in the scope of Expropriation for Motorway Construction Purposes
Resettlement	Resettlement Law
	Resettlement Implementation Regulation
Water and Wastewater	
Water and Wastewater Management	Water Pollution Control Regulation
	Surface Water Quality Regulation
	Regulation on the Control of Pollution Caused by Dangerous Substances in and around the Water Bodies
	Regulation Concerning Water for Human Consumption
	Regulation Concerning Protection of Groundwaters against Pollution and Deterioration
	Ordinance on Groundwater Resources
Air	
Air Quality	Regulation on the Control of the Air Pollution Sourced by the Industry
	Regulation on the Assessment and Management of Air Quality
	Regulation Concerning Follow up of Greenhouse Gas Emissions
Odor	Regulation on Control of Emissions Causing Odor
Marine	
Permits	Regulation on Principles and Procedures of Coastal Operation Permit
	Aquatic Products Law
	Aquatic Products Regulation
Dredging	Sea and Inland Waters Dredging Regulation
	Draft Regulation on the Environmental Management Plans for Sea Bottom Dredging
Seawater Quality	Regulation on Pollution Control Caused by Dangerous Substances in Aquatic Environment
	Swimming Water Quality Regulation
	International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 (MARPOL) Annex I - II, V, VI
	Water Pollution Control Regulation (General Quality Criteria for the Sea Water (Regulation's Table 4))
Noise	
Environmental Noise	Regulation on the Assessment and Management of Environmental Noise
	Regulation on Environmental Noise Emission Caused by Equipments Used Outdoors
Wastes	
Waste Management	Regulation on Waste Management
	Regulation on the Control of Packaging Wastes
	Hazardous Wastes Control Regulation
	Regulation on the Control of Medical Wastes
	Regulation on the Control of Waste Oils
	Regulation on the Control of Waste Batteries and Accumulators
	Regulation on the Control of Waste Tires

Subject	Name of the Legislation
	Regulation on the Control of Waste Vegetable Oils
	Regulation on the Control of Excavation Soil, Construction and Demolition Wastes
	Regulation on Mining Wastes
Landfills	Regulation on the Landfill of Wastes
	Circular on the Preparation of Implementation Project for Landfills
	Circular on Landfill of Mining Wastes and Technical Arrangement of Other Landfills
Environmental Permits and Licenses	
General	Environmental Impact Assessment (EIA) Regulation
	Regulation on Environmental Permit and Licenses
	Environmental Auditing Regulation
	Regulation for Starting Up and Opening a Workplace
	Communiqué on Certificate of Competency
Health and Safety	
Occupational Health and Safety	Labor Law
	Regulation on Occupational Health and Safety
	Regulation on Occupational Health and Safety at Mining Worksite
	Regulation on Methods and Essential for Work Health and Safety Training for Works
	Regulation on Health and Safety Signs
	Regulation Concerning the Use of Personal Protection Equipment at Workplaces
	Regulation on Health and Safety Measures to be taken at Works Involving Chemicals
	Regulation on Protecting Workers from Hazards of Explosive Environments
	First Aid Regulation
	Regulation Concerning the Protection of Workers from Risks Associated with Vibration
	Communiqué on Hazard Classes List related to Occupational Health and Safety
	Law on Pertaining to the Principles of Emergency Intervention and Indemnification of the Damages in Case of Sea Pollution by Petroleum and Other Harmful Substances
	Implementation Regulation of the Law Pertaining to the Principles of Emergency Intervention and Indemnification of the Damages in Case of Sea Pollution by Petroleum and Other Harmful Substances
	Regulation on Control of Large-Scale Industrial Accidents
Dangerous Substances	Regulation on the Transportation of Dangerous Materials on Motorways
	Regulation Concerning the Classification, Packaging and Labeling of Dangerous Substances
Structural Safety	Regulation on Structures to be Built in Disaster Zones
	Regulation on Structures to be Built in Earthquake Zones
	Regulation on the Protection of Buildings from Fire
Nature and Cultural Heritage	
Protection	Law on the Conservation of Cultural and Natural Heritage
	Regulation on Procedures and Principles Concerning the Protection of Game and Wild Animals and their Habitats and Combat with their Pests
Wetlands	Regulation on the Protection of Wetlands
Others	
General	Regulation Concerning the Increase of Efficiency in the Usage of Energy Resources
	Regulation on the Implementation of the Law Concerning Private Security Services

ANNEX B INTERNATIONAL REGULATIONS AND STANDARDS

- Convention Concerning the Protection of the World Cultural and Natural Heritage
- Convention for the Prevention of Marine Pollution from Land (Paris Convention)
- Bern Convention on Protection of Europe's Wild Life and Living Environment (1982)
- The Convention for the Protection of Marine Environment and the Coastal Region of the Mediterranean (Barcelona Convention) (1981),
- Convention on Long Range Transboundary Air Pollution (CLRCOK A.S.) (1983)
- Vienna Convention for the Protection of the Ozone Layer (1988)
- Montreal Protocol on Substances Depleting the Ozone Layer (1990)
- Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) (1991)
- Convention on Biological Diversity (Rio Convention) (1992)
- The International Convention on the Established of an International Fund for Compensation for Oil Pollution Damage (FUND 1992)
- International Convention on Civil Liability for Oil Pollution Damage (1992)
- UN Framework Convention on Climate Change (UNFCCC) (2004)
- Convention on Wetlands of International Importance, Especially as Waterfowl Habitat (RAMSAR) (1994)
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal (1994)
- Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) (1996)
- Kyoto Protocol (1997)
- United Nations Convention to Combat Desertification in Countries Experiencing Serious Drought and/or Desertification, Particularly in Africa
- European Landscape Convention (Florence Convention) (2001),
- Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade (Rotterdam Convention) (2004),
- Stockholm Convention on Persistent Organic Pollutant (POPs),
- Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention) (1972)
- Mediterranean Sea Protocol Concerning Specially Protected Areas and Biodiversity (1988), including related protocols,
- Convention On The Prevention Of Marine Pollution By From Ships (Marpol 73/78)
- Convention on the Regulation of Whale Hunting
- Conservation of Intangible Cultural Heritage Convention
- Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property
- European Cultural Convention (1954)
- European Convention on the Protection of the Archaeological Heritage (1969)
- Convention for the Protection of the Architectural Heritage of Europe (1985)

ANNEX C EHS COMMITMENTS REGISTER

Ref nbr.	Phase	Commitment Short Name	Commitment	Topics	Time scale	Document Source	Document Chapter/Appendix	COK A.S. Management Plans and Policies	Contractor Management Plans	Chainage (km) /Whole Project /Relevant Project Component	Guidelines
1	O	Surface and Groundwater Quality	Following practices given in IFC guidelines for minimizing risks during road paving activities (i.e paving in dry weather to prevent runoff of asphalt or cement materials)	Terrestrial Water Environment	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Health Procedure Environmental Management Plan, Soil erosion, Reinstatement and Landscape Management Plan	Whole Project	IFC EHS Guidelines for Construction Materials Extraction
2	C	Change of habitat.	Pinna nobilis Individuals will be identified and trans-located to suitable areas prior to works on the coastal approach bridge: Appropriate monitoring of the success of this translocation will be monitored after its implementation. Details of this measure will be provided in the Biodiversity Action Plan.	Biodiversity and Conservation	• 2 months before the schedule commencement of construction; •During construction; •During operations.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan	Bridge, Anatolian side. Dry dock TBC)	IFC EHS Guidelines for Construction Materials Extraction; IFC General EHS Guidelines; , Industrial Air Pollution Control Regulation, Environmental Permit and License Regulation
3	O	Contaminated road surface run-off.	<ul style="list-style-type: none"> All surface run-off of the approach viaducts to the bridge (i.e. the parts of bridge over land) will pass through an appropriately designed drainage system, incorporating sediment traps and oil interceptors to treat run-off, prior to being released into the marine environment wherever possible; Proper design and regular maintenance will ensure effective treatment and sufficient capacity to prevent any accidental release from overflow; Tracking of waste recovered from the oil water separator will be undertaken. 	Marine Physical	During operations	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Environmental Management Plan	Bridge.	IFC General EHS Guidelines
4	P, C, O	Renaturation/rehabilitation plans as required by Turkish Regulation 27471 on the Rehabilitation of Mining sites (23 January 2010).	<ul style="list-style-type: none"> Arrangements to be in compliance with the requirements of local authorities, environmental conditions and safe conditions for all living organisms. Geological and geotechnical investigations to define land use properties and morphological conditions and define measures against geohazards and stability of the area. Safety precautions for people, if the area will be open to human use. Measures to reduce risks of surface cracks (for underground sourcing) to prevent damage to wildlife. The cuts are filled and the deposits are removed according to the geotechnical and geological survey results, land is prepared and conditions are provided for landscaping. Suitable areas are planted according to the land use targets and measures are taken to prevent erosion. List of species (including local endemic species under protection of national and international jurisdiction) and renaturation of excavated areas. Drainage control and siltation prevention systems. 	Resources and Waste	• 2 months before the schedule commencement of construction; •During construction; •During operations.	ESIA	Vol III. Ch. 2.1 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, HR & Worker Management Plan, Environmental Management Plan, including Waste Management Plan, Biodiversity Action Plan	Whole Project	IFC General EHS Guidelines; Metropolitan Municipality Law
5	O	Health and Safety Risks due to Physical and Chemical Hazards	<ul style="list-style-type: none"> Pavers with exhaust ventilation systems will be used and proper maintenance of such systems will be ensured to maintain worker exposure to crystalline silica (millers and grinders) and asphalt fumes (pavers) below applicable occupational exposure levels. Correct asphalt product will be used for each specific application and application at the correct temperature will be ensured to reduce the fuming of bitumen during normal handling. Tollbooths will be equipped with proper ventilation systems; Protective clothing will be used when working with cutbacks (a mixture of asphalt and solvents for the repair of pavement), diesel fuel, or other solvents. Appropriate respiratory protection will be used when removing paints. 	Labour and Working Conditions	During operations.	ESIA	Vol III. Ch. 3.3 Vol II. Ch. 7	Environmental and Social Management Plan	Occupational Health & Safety Plan	Whole Project	IFC General EHS Guidelines

6	P, C, O	Hazardous Materials Management Procedure.	<ul style="list-style-type: none"> Procedures for handling and storage of hazardous materials shall be in line with manufacturer's instructions; Register hazardous materials and identify dangers posed by hazardous materials within the Project site; Fuels, oils and hazardous materials to be stored on a suitably sized impervious and bunded base; Use of drip trays for fuelling; No fuelling of vehicles or equipment to take place within excavated areas, if practically feasible; Training on the maintenance, handling, transport and disposal of hazardous materials and on emergency response management to be provided to onsite personnel; Provide adequate personal protective equipment (PPE) to staff who handle certain chemicals; and Ensure proper ventilation is provided when handling hazardous materials; and Protect the public from major hazards due to incidents or process failures involving hazardous materials. Also, minimize nuisance issues related to noise, odours, or other emissions. 	Resources and Waste	<ul style="list-style-type: none"> 2 months before the schedule commencement of construction; During construction; During operations. 	ESIA	Vol III. Ch. 2.1 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	
7	O	Surface and Groundwater Quality (routine operation and maintenance)	<ul style="list-style-type: none"> The Environmental Management Plan will be implemented so that surface water and ground water impacts are prevented from wastes generated during routine maintenance of the Motorway. The measures are discussed in Chapter 2.1 Resources and Waste For fertilizing the landscaping in the Right of Way, only natural fertilizer will be used as required in KGM's Technical Specification for landscaping of Highways, published in 2008. These natural fertilizers are in line with the IFC Environmental, Health, and Safety Guidelines for Toll Roads (IFC, 2007) which require compliance with international restrictions on pesticide use; Restriction of herbicide use to those that are manufacture under license, and registered / approved by the appropriate authority and in accordance with the Food and Agriculture Organization's (FAO) International Code of Conduct on the Distribution and Use of Pesticides. If pest infections are detected the competent authority needs to approve respective pesticide/biocide for pest control. In addition, the conditions listed in the IFC Performance Standard: Resource Efficiency and Pollution Prevention (2012) Pesticide Use and Management Section Articles 14-17 will be implemented including the formulation and implementation of an integrated pest management and/or integrated vector management approach. Permanent erosion and runoff control features will be regularly inspected and maintained during operation. Service Areas will conform to the following requirements: <ul style="list-style-type: none"> All Petrol Stations along the Motorway will be operated in accordance with TS 12820 which are in line with the IFC EHS Guidelines for Retail Petroleum Networks as best practice measures. These requirements will be included in the contract of the Petrol Station operator. Petrol Station locations are given in Chapter 2. Oil separators will be operated, and maintained to achieve the desired water treatment results. Mitigation measures described in the IFC EHS Guidelines for toll roads will be implemented during road paving practices to prevent / minimise stormwater risks during operation (i.e. use of proper staging techniques to reduce the spillage of paving materials during the repair of potholes and worn asphalts) Waste water treatment plant will be designed, licensed and operated to treat, domestic wastewater to discharge into the natural environment or permits will be obtained to connect to existing sewerage collection and treatment work. 	Terrestrial Water Environment	During operations	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan,	Whole Project	
8	P, C, O	Cultural Heritage Management Plan	A clear and detailed Management Plan should be developed in conjunction with the relevant authorities and implemented for the project. This will detail how the project manages and mitigates the Cultural Heritage as the scheme progresses, detailing a clear agreed framework for mitigation implementation. The plan will detail the roles and responsibilities of individuals responsible for dealing with known sites and unexpected discoveries during and after construction of the scheme, including clear reporting structures and example scenarios.	Archaeology and Built Heritage	<ul style="list-style-type: none"> 2 months before the schedule commencement of construction; During construction; During operations. 	ESIA	Vol III. Ch. 3.5 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Cultural Heritage Management Plan	Whole Project (onshore and offshore sections).	
9	C	Mitigation measures for impacts on water flow due to disruption to flooding controls and irrigation systems.	A CLO will be present at each work front.	Socio economic	During construction	ESIA	Vol III. Ch. 3.1 Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	

10	C	General Construction	<p>A collaboration and working protocol will be prepared between the Project and TEIAS setting out general engineering control measures, design standards, H&S control measures and procedures, and advanced communication and agreement protocols.</p> <p>Where the Project may interact with TEIAS's Energy Transmission Lines and related infrastructure: all Project-related works will be discussed in advance with the General Directorate of TEIAS. If required, specific construction method statements will be prepared for works and construction tasks.</p>	Displacement of Existing Land, Use, Property and People; Socio economic	During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure, Change Management Plan	Stakeholder Engagement and Grievance Mechanism Procedure, Environmental Management Plan	Whole Project	
11	P	Detailed hydrogeological investigation report shall be prepared and shall be submitted to State Hydraulic Works, Directorate of 25th Region before preparation of implementation projects.	A construction water management plan (incl. for worker camps) must be developed and implemented as soon as possible, including an estimate of water requirements, identification of sources and measures for water saving/ sustainable water use (especially in summer).	Terrestrial Water Environment	As soon as possible/2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	IFC General EHS Guidelines
12	P, C	Water management	A construction water management plan (incl. for worker camps) must be developed and implemented, including an estimate of water requirements, identification of sources and measures for water saving/ sustainable water use (especially in summer)	Ecosystem services	<ul style="list-style-type: none"> • 2 months before the schedule commencement of construction; • During operations 	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	IFC General EHS Guidelines; Water Products Law, Water Pollution Control Regulation
13	C	Mitigation measures for impacts on utility supply during construction.	A detailed hydrogeological investigation report shall be prepared and submitted to State Hydraulic Works before the start of construction in order to make sure that boreholes for drinking, utility and irrigation purposes located near settlements, in particular in the areas of Gelibolu-Bolayır and Evreşe, Çan, Yenice and Savaştepe settlements, are identified and taken into consideration in the project design (Section 2.6 of National EIA).	Socio economic	During construction	ESIA	Vol III. Ch. 3.1 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Environmental Management Plan, Stakeholder Engagement and Grievance Mechanism Procedure, Supply Chain Management Plan	Whole Project	
14	P, C, O	Grievance mechanism	A grievance mechanism has been established and will be kept updated and implemented.	Displacement of Existing Land, Use, Property and People	<ul style="list-style-type: none"> • 2 months before the schedule commencement of construction; • During construction; • During operations. 	ESIA	Vol III. Ch. 3.2 Vol II. Ch. 14	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Land Acquisition, Compensation & Resettlement Framework	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	IFC General EHS Guidelines, IFC EHS Guidelines for Retail Petroleum Networks
15	P, C, O	Contaminated materials	<p>A methodology will be developed to identify and address contaminated materials that are unexpectedly encountered during construction, until further steps are taken with the competent authorities, including appropriate temporary storage operations in contaminated soils.</p> <p>Temporary storage will be such that contaminating materials will not flow into any running water and be placed in suitable containers with sealed bottoms and covers to prevent runoff and wind dispersion.</p>	Geology, Soils and Contaminated Land	During construction	ESIA	Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Soil erosion, Reinstatement and Landscape Management Plan	Whole Project	IFC General EHS Guidelines, EN standards
16	C	Alien species management	<p>A monitoring plan will be carried out by the Ecological Clerk of Works to record alien species populations in the project area of influence.</p> <p>Appropriate measures will then be undertaken to remove new populations and prevent them from spreading throughout the Aol. In addition, prompt revegetation (i.e. sowing of native herbaceous species and/or planting native shrubs/trees) on bare soil with natural or semi-natural vegetation should be practiced in order to reduce the spread of alien species. This should be done as soon as possible after clearance and construction.</p>	Biodiversity and Conservation	During construction.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, HR & Worker Management Plan	Whole Project, where is the case.	
17	P	Soil pollution risk assessment	<p>A Pro-active risk assessment based on the possibility of soil pollution on the alignment will be conducted by a third party licensed consultant.</p> <p>Discussions will take place before the construction for the "potentially contaminant" areas adjacent or on the Motorway.</p> <p>Local authorities will be contacted to clarify who would be responsible for taking mitigating measures in case of contamination detected.</p> <p>These risk assessments will comply with the Turkish Soil Pollution Control and Regulated Polluted Areas Directive and best international practices in order to assess the probability of pollution.</p>	Geology, Soils and Contaminated Land	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Soil Erosion, Reinstatement and Landscape Management Plan	Whole Project	

18	O	A Project specific Grievance Mechanism to solve the relevant incidents.	A Project specific Grievance Mechanism will be used to record and solve the relevant incidents results. It will also specify required response times for grievances.	Socio economic	During operations	ESIA	Vol III. Ch. 3.1 Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	
19	P, C	Quarries and Associated facilities	A Quarry and Associated FacilitiesCMP will be developed which will include plans to retain rock structures as noise barrier between the quarrying area and any potentially affected village.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Quarries and AF Management Plan	Whole Project	
20	P, C	Construction Traffic Management	A specific Transport Control and Site Access Procedure to control construction traffic/activities will be implemented to decrease the risk of collision, including a proper communication protocol with authorities and other users. Any transgressions of this plan must be reported to relevant authority and deal with accordingly.	Biodiversity and Conservation	• 2 months before the schedule commencement of construction; •During construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Occupational Health & Safety Plan, Environmental Management Plan	Bridge.	
21	O	Spillage risk assessment	A spillage risk assessment will be undertaken in accordance with the UK Design Manual for Roads and Bridges (DMRB) () as part of the development of the Waste Management Procedure (e.g. to determine the areas of the Motorway most susceptible to spills/accidents, sensitive areas compare with local response capability/backup capacity) to determine the optimal location and type of emergency response equipment and the required capacities for handling liquid spills. The spill risk assessment will be completed once the final design of the Motorway has been approved by KGM. <ul style="list-style-type: none"> • The Environmental Management Plan specifies that Spill Response Kits will be available, including absorbent materials suitable for the materials to be handled on site, will be held at secure, clearly signposted locations, instructions will be provided with the kits and personnel will be trained in their use. • Any spillages will be immediately contained on site and all contaminated materials including soils will be removed from the site for suitable treatment and disposal. • All staff and subcontractors will be required to report any incidents and these will be subject to investigation and remedial and preventive actions will be taken. 	Geology, Soils and Contaminated Land; Terrestrial Water Environment	During operations	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	
22	P	Stormwater drainage risk assessment	A supplemental assessment of stormwater drainage risks to the Environment will be undertaken to verify that stormwater drainage designs are effective in mitigating impacts on surrounding land use, surface and groundwater or sensitive ecological receptors therein. The assessment will inform the selection, design and siting of sustainable storm water drainage solutions. Measures such as the need for sand layers to be used as filters in seepage pits (detritus basins in the form of a shallow pit connected to drain trenches), to prevent harmful substances to percolate into deeper soil layers or into the groundwater will be assessed. If relevant, the supplemental assessment will also include a monitoring programme for evaluating the effectiveness of the sustainable drainage solutions in avoiding contamination of soils during operation. A plan showing the locations and types of drainage selected at each chainage will be included in the supplemental Assessment.	Geology, Soils and Contaminated Land; Terrestrial Water Environment	P	ESIA	Vol II ch. 2	Environmental and Social Management Plan	Soil erosion, Reinstatement and Landscape Management Plan, Control of Substances Hazardous to Health Procedure Environmental Management Plan, Watercourse Crossing Plan	Whole Project	
23	P, C, O	Chance Finds Procedure:	A template for the Chance find procedure is presented in the Annex A of the current report. However, it is recommended that COK A.S. and its EPC contractor to revise it for being fit for the Project. A clear and detailed Chance Finds Procedure should be developed in conjunction with the relevant authorities and implemented for the project. It will detail the roles and responsibilities of individuals responsible for dealing with unexpected discoveries during construction of the scheme, including clear reporting structures and example scenarios. This will allow implementation of appropriate responses in the event of such discoveries, to the benefit of the Cultural Heritage. This is in line with IFC Performance Standard 8 (Cultural Heritage).	Archaeology and Built Heritage	• 2 months before the schedule commencement of construction; •During construction; •During operations.	ESIA	Vol III. Ch. 3.5 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Cultural Heritage Management Plan	Whole Project (onshore and offshore sections).	

24	P, C	Waste Management Procedure	<p>A Waste Management Procedure will be developed with the basis of the waste management hierarchy to comprise of the following:</p> <ul style="list-style-type: none"> Waste avoidance: Minimising the amount of material that needs to be generated and managed in the first place. Re-use of excavated soils in the Project area as far as possible and seek alternative uses of surplus spoil where practicable (eg landscaping and earth works for other projects) to minimise the requirements for off-site disposal Re-use on site: Where possible, the re-use of excavated materials within the project site is to be maximised. This reduces the need to import materials onto the site, reduces the need to find off site re-use or disposal locations and the associated materials handling and transport issues, reduces fuel use and minimises the project footprint. Re-use off site: Where all attempts to re-use excavated materials on site have been exhausted, re-use opportunities must be found off site. This includes finding sites that are approved by the relevant planning consent authorities (e.g. local council) to accept the specific wastes Disposal: Disposal is the last and least preferable management option to be considered. This will apply to the following: <ul style="list-style-type: none"> Material supply and transport from quarries Handling of hazardous Materials during construction Spoil and construction waste Management Waste management generated during operation Phase <p>During the detailed design and procurement stage, COK A.S. will be responsible for the identification of sources for all materials and equipment. The Contractor will be required to consider the environmental impacts when selecting the materials used for the Project. This will include using less harmful materials where possible, considering the carbon footprint of alternative materials and examining the impacts of extraction, processing and transport.. The Contractor will be required to develop sustainability practices, regulations and develop and organizational competency that will ensure that the mitigation measures are implemented efficiently.</p> <p>The excess excavated material that is not reusable will be disposed at areas deemed suitable for soil disposal in line with the COK A.S. policies, and as per the specific Turkish Regulation on Excavation Soil, Construction and Debris Waste Control Regulation () and the international best</p>	Resources and Waste	<ul style="list-style-type: none"> 2 months before the schedule commencement of construction; During construction. 	ESIA	Vol III. Ch. 2.1 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, including Waste Management Plan	Whole Project	IFC General EHS Guidelines, Regulation on Electricity Powered Current Facilities
25	C	Geological/Geotechnical Investigation Report compliance	<p>A Zoning Plan Based Geological/Geotechnical Investigation Report will be prepared in accordance with the Circular Letter No. 373 of T.R. Prime Ministry Disaster and Emergency Management Presidency by the General Directorate of Highways, dated 19.01.2010. Provisions of the report will be followed during construction.</p>	Geology, Soils and Contaminated Land	During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Soil erosion, Reinstatement and Landscape Management Plan, Environmental Management Plan, Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	IFC General EHS Guidelines, Provisions of the Highway Traffic Law
26	P	Construction activities.	<p>Access roads will be clearly defined before beginning construction activities. Some public roads may need to be used for access.</p> <p>Construction vehicles will not be permitted to drive beyond the bounds of designated access roads. Transgressions will be reported to Project management and dealt with accordingly.</p> <p>All proposed use of public roads will be agreed in writing with the local and regional roads and highways authority.</p>	Biodiversity and Conservation	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Transport Control & Site Access Procedure	Whole Project	
27	P, C, O	Local access	<p>Access roads will be constructed in parallel to the Motorway near agricultural areas/zones to provide access to agricultural lands.</p>	Displacement of Existing Land, Use, Property and People	<ul style="list-style-type: none"> 2 months before the schedule commencement of construction; During construction; During operations. 	ESIA	Vol III. Ch. 3.2 Vol II. Ch. 16	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Land Acquisition, Compensation & Resettlement Framework	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	
28	P, C	Additional marine heritage	<p>Additional marine heritage assessment will be undertaken in order to confirm that no marine CH items are located in the project area. In the first instance this will take the form of a specialist archaeological review of geophysical data of areas of the seabed where dredging/direct physical impacts are anticipated. Should this indicate the potential presence of archaeological remains, a diving or ROV survey may be necessary. This is in line with IFC Performance Standard 8 (Cultural Heritage)</p>	Archaeology and Built Heritage	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 3.5 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Cultural Heritage Management Plan	Whole Project (offshore section).	
29	P, C	Additional marine heritage	<p>Additional marine heritage assessment will be undertaken in order to confirm that no marine CH items are located in the project area. In the first instance this will can take the form of a specialist archaeological review of geophysical data of areas of the seabed where dredging/direct physical impacts are anticipated. Should this indicate the potential presence of archaeological remains, a diving or ROV survey may be necessary. This is in line with IFC Performance Standard 8</p>	Archaeology and Built Heritage	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 3.5 Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project (onshore).	

30	P	Contaminated soils	Address both the expected and unexpected encounter of contaminated soils: A Soil Erosion, Reinstatement and Landscape Management Plan will be developed to include measures to ensure that the road design is optimized to limit the gradient of the access roads to reduce runoff-induced erosion, and provide adequate road drainage based on road width, surface material, compaction and maintenance. These plans will be integrated into the process for deciding the layout of all construction sites, work and camp areas. COK A.S. will review the implementation of these plans. This Plan will be integrated with other related plans and procedures (e.g. Environmental Management Plan, waste management procedures etc) procedures and consistent with the Turkish Regulation on Soil Pollution Control and Point-Source	Geology, Soils and Contaminated Land	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Soil Erosion, Reinstatement and Landscape Management Plan	Whole Project	
31	P, C	Construction waste management	Adoption of good construction waste management practices (e.g., placement in appropriate containers and sign-posted, with restricted access, regular removal of waste will ensure that risks to the public are very low.	Community Health and Safety	• 2 months before the schedule commencement of construction; • During construction	ESIA	Vol III. Ch. 3.4 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	IFC General EHS Guidelines, Water Products Law
32	C	Use of signs and/or fences in access roads and construction sites.	All access roads will be appropriately signed and fenced in order to prevent disturbance of areas beyond the Project footprint. Appropriate measures will be undertaken to prevent site access, particularly at areas under active construction. Fences will also prevent entrance of fauna to the site, thus avoiding accidents.	Biodiversity and Conservation	During construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Transport Control & Site Access Procedure	Whole Project, where is the case.	
33	C	Positioning of all ancillary plants.	All ancillary plant (e.g. generators, compressors) will be positioned so as to cause minimum noise disturbance.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Temporary construction sites	
34	C, O	Navigational risk	A VTS and a STS are to be in place. The construction vessel presence and the timing, duration and areas of restricted access will be advertised at local ports and communicated to the maritime traffic using onboard VHF radio. All construction vessels and maritime traffic are further expected to comply with the IMO COLREGS (1972) to prevent collisions at sea by ensuring they are visible and have suitable navigation equipment. The early works will be using the existing Vehicle Traffic System and STS to minimize risks related to increase in vessel presence. The construction methodology provided by the EPC contractor indicates the following mitigation procedures will be in place to mitigate ship collision risks with other vessels within project area or vicinity with 3rd party vessels: <ul style="list-style-type: none"> • Use correct navigation aids (update chart, GPS, radar, etc.) • Continuous radio-watch. • Each operation has to be reported to Port Authority, proper communication and each vessel passing or crossing keep distance and should slow down. • Respect the applicable shipping trade regulations; navigation control, correct signing, lighting and signalisation. • Be aware of the strong and treacherous currents; assisting tug is available for critical manoeuvres. • All vessels utilized on site shall be in good and sound condition. • Vessels shall make sure that the access to the channel / sailing route / traffic lane is clear before entering • Proper communication with other vessel and with the port authorities. The bridge will be designed in accordance with the relevant Turkish legislation so as not to significantly impede or delay passage of any vessel, regardless of its size, shape or design. The design will need to incorporate navigational safety measures (e.g. warning lights, shipping lane markers and signage, approach markers, guidance buoys etc.), anti-collision and bridge protection structures in compliance with national and international shipping laws and regulations.	Marine Physical	During operations	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Marine Safety for Tower Foundation Procedure	Dardanelles Strait.	
35	P, C	Crushing, screening and ready mixed concrete plants must be in accordance with the 'Industrial Air Pollution Control Regulation' and the 'Environmental Permit and License Regulation.	All environmental precautions and relevant permits will be obtained for crushing and screening plants and ready mixed concrete plants, in accordance with the 'Industrial Air Pollution Control Regulation' and the 'Environmental Permit and License Regulation'.	Air and Climatic Factors	• 2 months before the schedule commencement of construction; • During construction.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	
36	C	Surface and Groundwater Quality	All facilities and structures will be regularly inspected and maintained to ensure proper and efficient operation at all times, and especially after heavy rainfall. Sediment deposits will be regularly removed and disposed of at either by spreading on site (if uncontaminated) or at a suitably licensed facility.	Terrestrial Water Environment	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Occupational Health & Safety Plan	Whole Project	

37	C	Construction activities should avoid the breeding bird period.	All measures will be undertaken to avoid, whenever feasible, clearing vegetation during the breeding bird period. Two areas were identified during the field survey with suitable forest habitats for passer birds: KP 117 to KP 121 and KP 135 to KP 138. Construction activities in these areas should avoid the breeding bird period (mid-April to mid-June). In places where Ministry of Forestry is responsible for vegetation clearance, this measure and related other mitigation measures will equally apply to them.	Biodiversity and Conservation	During construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan	KP 117 to KP 121 and KP 135 to KP 138.	
38	P	Permitting - municipalities	All required permits, approvals and related permissions and consents - permits here after - will be obtain from state institutions and organizations (i.e. General Directorate of Highways, relevant municipalities etc.). The Project will prepare a permits register that will identify all permits to be obtained by the Project prior to construction. The Project will engage with the relevant authorities and regulators where there is uncertainty over the need for a permit and the specific requirements of the said permit. This permits register will be maintained and available for inspection.	Geology, Soils and Contaminated Land; Terrestrial Water Environment; Air emissions; Noise emissions and vibrations; Socio economic; Community Health and Safety; Archaeological and Built Heritage.	2 months before the schedule commencement of construction.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure, Change Management Plan	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	
39	P, O	Service Areas and Petrol Stations design	All Service Areas and Petrol Stations will be designed and operated in accordance with the IFC EHS Guidelines for Retail Petroleum Networks.	Geology, Soils and Contaminated Land; Air emissions; Community Health & Safety	• 2 months before the schedule commencement of construction; • During operations.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Emergency Response Plan, Occupational Health & Safety Plan, Biodiversity Action Plan, Environmental Management Plan	Whole Project	
40	C	General Construction	All tree cutting activities during construction will be undertaken in the presence of an authorised person from the relevant Regional Directorate of Forest.	Community Health and Safety; Labour and Working Conditions.	During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, HR & Worker Management Plan, Cultural Heritage Management Plan	Whole Project	
41	P	All wastewater discharges must comply with relevant Turkish legal requirements.	All wastewater from the Service Areas will be designed to either be discharged into the local/municipal sewage network (if available nearby) or otherwise treated to the required standards prior to discharge to the suitable receiving environment. All wastewater discharges must comply with relevant Turkish legal requirements (Water Pollution Control Regulation 2004, No. 25687) and other Lender Standards prior to disposal. These regulations are in line with EU environmental regulatory framework.	Terrestrial Water Environment	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	IFC General EHS Guidelines
42	C, O	Waste and Wastewater	All wastewater treatment plant will be designed, operated and maintained to meet the parameters and limits specified in the Water Products Law No. 1380 and the related regulations for treated water characteristics. Any exceedance of the parameters and limits will be addressed through undertaking immediate remedial action and implementing control measures.	Resources and Waste	• During construction; • During operations.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	IFC General EHS Guidelines, Water Pollution Control Regulation
43	C, O	Potential of climate change as well as other factors will be conducted	Although the preliminary design has not taken into account factors such as climate change and ecology factors, a preliminary review of the design based on potential climate change as well as other factors will be conducted. Alternative mitigation may need to be developed for improving the design/mitigating significant impacts as far as possible. Mitigation measures may include: • Asphalt/road surfacing must be suitable for hot & dry climate; • Design of embankments and other sloped areas (and the vegetative cover) will need to account for increased risk of soil erosion due to heavy (though infrequent) rain events; • Design of the Motorway drainage system will need to be suitable for the potentially more	Terrestrial Water Environment	• During construction; • During operations.			Environmental and Social Management Plan	Biodiversity Action Plan, Environmental Management Plan, Marine Safety for Tower Foundation Procedure	Whole Project	IFC General EHS Guidelines
44	C	Additional level of mitigation.	An additional level of mitigation will be adopted during the construction activities in those areas of the Project overlapping National Protected Areas and International Designated Areas. This additional mitigation will comprise greater monitoring of construction-related activities and enhanced supervision of construction activities which pose a greater risk to the sensitive and Protected Areas (e.g. vehicle re-fueling, concrete pouring, any 'wet' works etc). The Project will provide additional resources for monitoring of such activities and also enhanced remedial action capability and resources.	Biodiversity and Conservation	During construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Environmental Management Plan, Emergency Response Plan	Whole Project, where is the case.	IFC General EHS Guidelines
45	C, O	Afforestation Plan	An Afforestation Plan will be implemented after approval by the Turkish relevant authorities and international Project lenders. Furthermore, it will reflect COK A.S.'s engagement to ensure planting of up to 5 trees for each one removed.	Displacement of Existing Land, Use, Property and People	• During construction; • During operations.	ESIA	Vol III. Ch. 3.2 Vol II. Ch. 29	Environmental and Social Management Plan, Change Management Plan, Land Acquisition, Compensation & Resettlement Framework	Biodiversity Action Plan, Environmental Management Plan	Whole Project	IFC General EHS Guidelines

46	C	Ecological bridges	An ecological bridge will be constructed at suitable point (s) in line with the requirements of related forestry directorates.	Displacement of Existing Land, Use, Property and People			Vol III. Ch. 3.2 Vol II. Ch. 28	Environmental and Social Management Plan, Change Management Plan, Land Acquisition, Compensation & Resettlement Framework	Biodiversity Action Plan, Environmental Management Plan	Whole Project	IFC General EHS Guidelines
					During construction	ESIA					
47	C	Surface and Groundwater Quality	An Emergency Response Plan (ERP) will be developed in line with Environmental, Health, and Safety (EHS) Guidelines: General EHS guidelines (IFC, 2007) for handling spills of hazardous materials including fuels that will be handled during construction works.	Terrestrial Water Environment	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Emergency Response Plan	Whole Project	IFC General EHS Guidelines, IFC Guidelines for Construction Materials Extraction, Environmental Management Plan, Traffic Safety Management Procedure, Turkish environmental standards
48	O	Health and Safety Risks due to Emergencies	An Emergency Response Plan, covering the emergency situations (involving vehicles and pedestrians) that may occur during the Motorway's operation, should be prepared and implemented by trained personnel in order to avoid significant risks.	Labour and Working Conditions	During operations.	ESIA	Vol III. Ch. 3.3 Vol II. Ch. 7	Environmental and Social Management Plan	Emergency Response Plan	Whole Project	IFC General EHS Guidelines, Turkish Industrial Air Pollution Control Regulation for the Operation of Stone Crushing and Screening Plants
49	C	Water and Wastewater Management Procedure	An Environmental Management Plan will be developed to respond to surface and ground water resources potential mitigation during the construction phase. The Procedure will include the following items: <ul style="list-style-type: none"> - Water resources assessment based on requirements for batch plant and other requirements or construction process. As previously discussed water sources will be identified with their surplus capability for use during construction process. Monitoring of water quantity will be performed - Consideration of the management of the construction sites during periods of heavy rainfall. High sediment generating activities such as road paving will be avoided and exposed surfaces and stored materials covered if necessary to reduce erosion of sediments into surface waters. - Wastewater from all construction compounds and associated building will be either discharged into the local/municipal sewage network or treated prior to discharge to the suitable receiving environment or collected onsite and transported by tanker for disposal at the local sewage treatment works. All wastewater discharges must comply with relevant Turkish legal requirements (Water Pollution Control Regulation 2004, No. 25687) and other Lender Standards prior to disposal. - Wastewater generated during concrete batch plant operations and washing of cement trucks will be monitored for the pH and temperature of the wastewater effluent. Water usage is significant in concrete plants, not only in concrete production but also for washing waste in concrete mixer trucks, washing patios, and sprinkling on aggregates to reduce dust. Concrete wastewater may show high pH values, between 11 and 12, and high alkalinity due to the presence of hydroxides and carbonates in addition to the elevated concentration of solids. These characteristics may necessary to treat wastewater prior to final disposal, whether in water or soil. Effluent guidelines for the. Turkish legal requirements (Water Pollution Control Regulation 2004, No. 25687) and other Lender Standards prior to disposal. - Mud generated from the concrete batch plant operation operations and washing of cement trucks will be tested for hazardous characteristics and will be disposed of in line with Turkish regulations on waste management which are in line with EU Regulations. -Waste water treatment plant will be designed, licensed and operated to treat, domestic wastewater to discharge into the natural environment or permits will be obtained to connect to existing sewerage collection and treatment work. 	Terrestrial Water Environment	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	IFC General EHS Guidelines, Regulation on the Rehabilitation of Mining Sites
50	P	Soil Management	An Environmental Management Plan including the Soil protection provisions will need to be developed to include measures to ensure that the road design is optimized to limit the gradient of the access roads to reduce runoff-induced erosion, and provide adequate road drainage based on road width, surface material, compaction and maintenance.	Geology, Soils and Contaminated Land	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Soil erosion, Reinstatement and Landscape Management Plan	Whole Project	IFC General EHS Guidelines

51	P	EMP Marine	An Environmental Management Plan, Marine Safety for Tower Foundation Procedure including the marine works to be required from the contractors prior to construction, will be prepared.	Biodiversity and Conservation	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Environmental Management Plan, Emergency Response Plan, Marine Safety for Tower Foundation Procedure	Bridge	IFC General EHS Guidelines
52	P, C	Environmental and Social Site Selection Plan for Quarry selection	An ES site selection plan setting out the protocol for the selection of quarry, borrow pit and spoil disposal sites (and all other sites for off-site activities) will be undertaken. The site selection plan will include the procedures for conducting a due diligence on third party quarries. Gaps identified based on ES site selection will be requested to be mitigated by third party quarry operators. The use of the third-party quarries will be based on their suitability to be in line IFC guidelines. The EHS considerations that will need to be taken into account in the selection of appropriate quarry sites and access routes will be based on IFC General EHS Guidelines (IFC, 2007) as well as guidelines for IFC EHS Guidelines for Construction Materials Extraction (IFC, 2007). These mitigation measures together with the existing permitting framework in Turkey will be used will be used to minimize the worst-case scenario impacts and allow for residual impact assessment.	Resources and Waste	<ul style="list-style-type: none"> • 2 months before the schedule commencement of construction; • During construction. 					Whole Project	IFC General EHS Guidelines
53	C	Pest management	An Integrated Pesticides Management Procedure part of the Environmental Management Plan will be developed and put into practice.iced	Biodiversity and Conservation	During construction.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan	Whole Project, where is the case.	IFC General EHS Guidelines
54	O	Any damage to utility distribution networks will be repaired promptly in accordance with the network owner or operator.	All utility distribution networks intersected by Project Components will be identified and appropriate construction techniques will be used to reduce disruptions. Any planned disruption of utility distribution services will be communicated to local authorities and local communities with at least 72 hours' notice; where planned disruptions are expected to last more than 12 hours, a specific risk analysis will be performed to assess impacts expected on local communities and to identify additional mitigation measures. Any damage to utility distribution networks will be repaired promptly in accordance with the network owner or operator. Any unplanned disruption of utility distribution services will be managed through communication to local communities, written information to explain event occurred and repair measures needed.	Socio economic	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 3.1 Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Environmental Management Plan	Whole Project	IFC General EHS Guidelines
55	C	Construction methodology will incorporate appropriate technical guidelines during slope excavations.	Appropriate construction techniques will be implemented that will incorporate risk assessments for excavation and slope stability requirements. Soil stability will considered to be adequately addressed by the available soil conditions and construction techniques.	Geology, Soils and Contaminated Land	During construction	ESIA	Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Soil erosion, Reinstatement and Landscape Management Plan	Whole Project	IFC General EHS Guidelines
56	C	Critical area (overpass)	Area has been identified as a weak ground transition and will be examined in detail during the project.	Geology, Soils and Contaminated Land	During construction	ESIA	Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Soil erosion, Reinstatement and Landscape Management Plan	KM 164+710	IFC General EHS Guidelines
57	P, C, O	Employment terms and conditions.	As refelected in the COK A.S.'s Employment Policy Document, decisions will not be made on the basis of personal characteristics that are unrelated to inherent job requirements, such as language, race, sex, political opinion, philosophical belief, religion, sect, nationality, ethnic origin, disability, age or sexual orientation, in accordance with Turkish and EU legislation on anti-discrimination and equal opportunities.	Labour and Working Conditions	<ul style="list-style-type: none"> • 2 months before the schedule commencement of construction; • During construction; • During operations. 	ESIA	Vol III. Ch. 3.3 Vol II. Ch. 7	Employment Policy	HR & Worker Management Plan, Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	IFC General EHS Guidelines
58	C	Subcontractor and Supply Chain Management (Including Child and Forced Labour Risks)	As stated in its Labour/Employment Policy, COK A.S. has established a number of control measures to minimise potential risks and impacts related to subcontractor management and child and forced labour. COK A.S. will abide by these measures.	Labour and Working Conditions	During construction	ESIA	Vol III. Ch. 3.3 Vol II. Ch. 7	Employment Policy	HR & Worker Management Plan, Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	IFC General EHS Guidelines; Labour Law; Worker Health and Work Safety rules
59	P	Avoidance (limit use).	Avoidance (limit use): For instances of built heritage, avoiding the use of roads in the vicinity of assets will limit impacts. In the case of Münipbey Deresi Köprüsü (a bridge) construction traffic should be limited from traversing the structure. This is in line with Turkish Law, IFC Performance Standard 8 and the Cultural Heritage Management Plan.	Archaeology and Built Heritage	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 3.5 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Cultural Heritage Management Plan	Bridge.	IFC General EHS Guidelines, Turkish Law on Occupational Health and Safety and Regulation on the Use of Personal Protective Equipment at/in Workplaces
60	P, C	Construction activities.	Before beginning construction, areas to be cleared will be delimited in order to limit as much as possible the surface of vegetation to be cleared.	Biodiversity and Conservation	<ul style="list-style-type: none"> • 2 months before the schedule commencement of construction; • During construction. 	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, HR & Worker Management Plan	Whole Project	IFC General EHS Guidelines, Regulation on Health and Safety

61	P,C	Borders	Borders of the construction areas and expropriation corridor will be identified by suitable markings	Displacement of Existing Land, Use, Property and People	• 2 months before the schedule commencement of construction; •During construction	ESIA	Vol III. Ch. 3.2 Vol II. Ch. 8	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure, Land Acquisition, Compensation & Resettlement Framework	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	IFC General EHS Guidelines
62	P	minimize changes in the hydrology and flow of water courses	Bridges will be designed to meet the discharges of 100 to 500 year floods. In general, bridge openings will be designed to minimise flow velocity to minimise scour of river beds and slopes near bridges. Erosion and scour potential under flood conditions will be considered and appropriate precautions taken. Culverts will be designed to meet the discharge of a 10 year flood unless the structure is located near sensitive locations such as residential areas or farmland where the discharge of a 100 year flood will be met. In the vicinity of large river crossings, the Motorway will be designed to accommodate a 100-year flood. Although the preliminary design has not been taken into account factors such as climate change and ecology factors, a preliminary E&S review of the design based on potential climate change as well as other factors will be conducted and findings reported. The E&S review will include a review of culvert discharge locations and assessment of risks to flooding and erosion of farmland and other sensitive receptors. Alternative mitigation may need to be developed for improving the design/mitigating significant impacts as far as possible	Terrestrial Water Environment	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Watercourse Crossing Plan, Environmental Management Plan	Whole Project	IFC General EHS Guidelines
63	C	Control vibration from general construction sites.	Buildings located within 50 m of significant sources of vibration (e.g. piling, operation of vibratory equipment (e.g. compaction) and blasting) will be identified ahead of construction works. Sensitivity of the identified buildings and building occupants to vibration will be evaluated, and if vibration predictions or measurements show the potential for building damage, alternative construction methods should be developed to avoid damage occurring. Where disturbance due to vibration is likely, the method will be reviewed as far as practicable. The vibration standards will be as defined in the ESHIA as implemented through the noise management plan. Documentation for each of the identified buildings will be prepared. This will include photographs of building structures sensitive to vibration and results of the sensitivity evaluation.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Biodiversity Action Plan	Near settlements	
64	P, C	Mitigation measures for impacts on water flow due to disruption to flooding controls and irrigation systems.	Channels will be reinstated within one month of trench filling to at least pre-construction status. Project elements will be located to minimize risks to important sources of groundwater (including unofficial community and communal sources and groundwater wells) and to ensure surface waters and water supplies are not impacted. Where impacts cannot be avoided, appropriate technically and financially feasible mitigation measures will be developed, such as new ground water wells and diversions of irrigation channels to maintain the functionality of the systems during construction period.	Socio economic	• 2 months before the schedule commencement of construction; •During construction.	ESIA	Vol III. Ch. 3.1 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	
65	C	Surface and Groundwater Quality	Channels, bunds and sandbag barriers will be provided on site to direct run-off to the collection system.	Terrestrial Water Environment	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	IFC General EHS Guidelines
66	C	General Construction	Characteristics and specifications of materials to be used on highway construction will be in accordance with the 'Highway Technical Specification' (issued by General Directorate of Highways). A statement - confirming compliance with Highway Technical Specification - of all materials to be used will be prepared by the Project and submitted for approval to the General Directorate of Highways. This approval will be obtained 2 months before the commencement of construction.	Displacement of Existing Land, Use, Property and People; Socio economic	During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan, Change Management Plan	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	IFC General EHS Guidelines
67	C	CLOs will be present at work fronts.	CLOs will be present at work fronts to ensure that impacts from planned disruptions are minimised.	Socio economic	During construction	ESIA	Vol III. Ch. 3.1 Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	IFC General EHS Guidelines, Regulation on Structures to be Built in Disaster Areas, Regulation on Buildings to be Built in Earthquake Areas

68	P, C	Quarry Operations Procedures	<p>COK A.S. / EPC will establish a separate Quarry and AF Management Plan to ensure compliance with applicable Turkish environmental standards and IFC Guidelines for Construction Materials Extraction (IFC, 2007). The IFC Guidelines for Construction Materials Extraction details the environmental issues during the operational, construction, a decommissioning phases of construction materials extraction primarily include air emissions, noise and vibrations, water as well as waste. Of particular importance will be the the land conversion aspects which will take into account the findings of the biodiversity setting established in this ESIA and integrate into site rehabilitation practice. In addition, procedures will be implemented with respect to traffic safety as per the COK A.S. Transport Control and Site Access Procedure (for on-site and off-site) to be developed.</p> <p>Quarry and IF CMP will include:</p> <ul style="list-style-type: none"> • When designing the transport routes, the Contractor shall consider social issues to minimize the impacts from passing through populated areas; • To ensure community safety, all truck drivers shall receive driver safety training which includes safe driving through small villages; • Quarry access roads shall be well maintained. Water will be sprayed on unpaved roads to minimize dust generation and will be surfaced or stabilized where feasible; • The Contractor will ensure that the width of the access roads is adequate, especially in villages; • During the operation of the quarries, dust generations shall be avoided by covering, shielding or watering the dusty surface areas as per the Turkish Industrial Air Pollution Control Regulation for the Operation of Stone Crushing and Screening Plants; and • Roads damaged during the operation of a quarry shall be repaired on a timely basis. <p>In addition:</p> <ul style="list-style-type: none"> • A due diligence will be conducted for existing quarries to ensure permits are valid and operations are in compliance and international guidelines. Relevant suggestions will be made to improve current standards of the quarry. Quarries should be monitored frequently. Gaps identified based on site selection will be requested to be mitigated by third party quarry operators. The use of the third-party quarries will be based on their suitability to be in line IFC guidelines. • In case of opening a new quarry, all necessary permits will be obtained, operations will be setup in accordance with international standards and quarries should be monitored frequently. Whenever possible, general preference will be given to using existing (fully licensed) quarries over opening new quarries <p>COK A.S.. will establish a Control of Substance Hazardous to Health Procedure in line with Turkish</p>	Resources and Waste	<ul style="list-style-type: none"> • 2 months before the schedule commencement of construction; • During construction. 	ESIA	Vol III. Ch. 2.1 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Environmental Management Plan, including Waste Management Plan, HR & Worker Management Plan, Transport Control & Site Access Procedure, Quarries Management Plan	Whole Project	
69	P, C, O	Waste Management	<p>COK A.S.. will establish a Control of Substance Hazardous to Health Procedure in line with Turkish regulations and IFC General EHS Guidelines (IFC, 2007). The IFC General EHS Guidelines which are applicable to all projects or facilities that handle or store any quantity of hazardous materials and the management of major hazards will be used to obtain additional guidance for handling hazardous materials at, or above, threshold quantities. In this case, if needed special treatment to prevent accidents such as fire, explosions, leaks or spills, and to prepare and respond to emergencies will be implemented.</p>	Geology, Soils and Contaminated Land; Terrestrial Water Environment, Waste and resources	<ul style="list-style-type: none"> • 2 months before the schedule commencement of construction; • During construction; • During operations. 	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	

70	P, C, O	OHS Management System	COK A.S. is committed to develop and implement an OHS management system, aligned with GIIP such as OHSAS 18001 / ISO45001. This management system is intended to reflect the risks to the workforce as a result of the project and to identify and ensure the implementation of appropriate mitigation during construction and operation. The OHS management system will ensure that the following measures will be taken to avoid and/or minimize risks due to moving equipment and vehicles or works to be conducted at height or elevated/overhead works: <ul style="list-style-type: none"> • Good cooperation with the local medical services will be ensured. • A system will be established for the reporting and recording of occupational accidents and dangerous occurrences/incidents. • PPEs will be selected based on the specific hazards and risks of the task to be performed and properly maintained to keep them effective and operational throughout their use. In addition to orientation trainings, all the direct and contracted workers will be provided with relevant trainings prior to commencement of new assignments (change of workplace/task, change of working machinery and equipment, introduction of new technologies, etc.). Workers with rescue and first-aid duties will be provided with dedicated training. Through appropriate contract specifications and monitoring, it will be ensured that service providers, as well as contracted and subcontracted Labour, are trained adequately before assignments begin. <ul style="list-style-type: none"> • In the case of any accident arising from technology and material to be used, Occupational Health and Safety Statements will be complied with. • A visitor orientation and control program will be established to ensure visitors do not enter hazard areas unescorted. In this respect, relevant checkpoints and record keeping practices will be used for ensuring both safety of the works and the visitors. 	Labour and Working Conditions	<ul style="list-style-type: none"> • 2 months before the schedule commencement of construction; • During construction. During operation	ESIA	Vol III. Ch. 3.3 Vol II. Ch. 7	Environmental and Social Management Plan	Occupational Health & Safety Plan	Whole Project	
71	P, C, O	Stakeholder Engagement Plan (SEP)	COK A.S. management and CLOs will keep abreast of gas-field activities in the Malkara area and if appropriate (and responsible operators identified), liaise with the gas-field operators to clarify any logistical or other issues to prevent negative impacts. If relevant, the operators will be included as a Project stakeholder in the SEP.	Cumulative Impacts	P/C/O	ESIA	Vol II. Ch. 8	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure,	Whole Project	
72	P	Climate resilience	COK A.S. will assess the E&S impacts of each service area along the Motorway and any permitting requirements – prior to construction. The assessment will include inter alia the consideration of measures to minimize energy consumption and water use as part of climate change resilience. The assessment results will be sent to Lenders for review.	Air and Climatic Factors	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 2.5 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Environmental Management Plan, Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	
73	C	Construction noise impact assessment.	COK A.S. will assess the potential impacts as part of the change management procedure when locations of associated facilities and haulage routes are known.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Near settlements	
74	P	Impacts and permit requirements	COK A.S. will assure assessing the E&S impacts of each service area along the motorway and any permitting requirements – prior construction. The assessments' results will be sent to Lenders for review.	General comments	2 months before the schedule commencement of construction	ESIA	Vol II ch. 2	All the management plans under ESMP	All the management plans under ESMP	Whole Project	
75	P, C, O	Community Relations Management Plan	COK A.S. will develop a Community Relations Management Plan, with commitments to implement the following key measures to protect the community from adverse effects during construction (noise, dust, other emissions risks with material and hazardous substances and accidents) and operation (traffic noise and air quality).	Community Health and Safety	<ul style="list-style-type: none"> • 2 months before the schedule commencement of construction; • During construction; • During operations. 	ESIA	Vol III. Ch. 3.4 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Biodiversity Action Plan Environmental Management Plan	Whole Project	IFC General EHS Guidelines
76	P, C, O	Land Acquisition, Compensation and Resettlement Framework (LACRF) & Community-Level Assistance Programme (CLAP)	COK A.S. will do facilitate access to land for women, i.e. through the community needs assessment (CNA) and Supplemental LACRF/CLAP". Further actions for construction and operation will be established as part of the CNA and CLAP.	Ecosystem services Displacement of Existing Land, Use, Property and People	during the CLAP with implementation during pre-construction, construction and operation	ESIA	Vol II ch. 2	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Land Acquisition, Compensation & Resettlement Framework, Change Management Plan	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	IFC General EHS Guidelines, IMO regulations
77	P, C	Stakeholder Engagement Plan (SEP)	COK A.S. will engage with BOT contractors (or other contractors if not a BOT model) to sort any potential logistical issues once these are selected by KGM for other segments, and include these firms as stakeholders in the Project SEP.	Cumulative Impacts	P/C	ESIA	Vol II. Ch. 8	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Subcontractor Management Plan	Whole Project	

78	O	Health and Safety Risks due to General Occupational Health and Safety Hazards	COK A.S. will ensure that the operation and maintenance personnel are properly trained in their specialty and successfully completed the necessary security investigations. The Operation and Maintenance Plan will be submitted to the KGM four months ahead of the start of Motorway- Bridge's operation. In accordance with the related terms of the BOT contract, 1 year ahead of the end of the contract duration, personnel designated by the KGM will be trained by COK A.S. on the aspects related with the operation and maintenance works of the Motorway. Sub-contractors to be involved in the operation of service areas will be subject to the same contractual conditions with the Project Sponsor and sub-contractors will be required to apply same occupational health and safety measures implemented for the whole Project. Healthcare services of the Workers who are employed in Maintenance of highway will be obliged to the contractor company.	Labour and Working Conditions	During operations.	ESIA	Vol III. Ch. 3.3 Vol II. Ch. 7	Environmental and Social Management Plan	Occupational Health & Safety Plan, Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	IFC General EHS Guidelines
79	P, C, O	Employment terms and conditions.	COK A.S. will ensure that workers' terms and conditions of employment are clearly documented in writing and communicated to them, including their entitlement to wages, hours of work, overtime arrangements and overtime compensation, benefits and the grievance mechanism for workers. COK A.S. will ensure its contractors and subcontractors, as well as itself, abide by these commitments.	Labour and Working Conditions	• 2 months before the schedule commencement of construction; • During construction; • During operations.	ESIA	Vol III. Ch. 3.3 Vol II. Ch. 7	Employment Policy	HR & Worker Management Plan, Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	IFC General EHS Guidelines
80	C	Loss of Income Sources due to contract termination of Construction Workforce in the End of the Construction Phase	COK A.S. will ensure that, following the completion of construction activities, contract termination of the construction workforce is carried out in compliance with all relevant national and international legal and contractual requirements related to notification of public authorities, and provision of information to, and consultation with workers and their organizations. COK A.S. will ensure that all workers receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner. COK A.S. will ensure that all outstanding back pay and social security benefits and pension contributions and benefits are paid on or before termination of the working relationship to the workers.	Labour and Working Conditions	During construction	ESIA	Vol III. Ch. 3.3 Vol II. Ch. 7	Employment Policy	HR & Worker Management Plan	Whole Project	IFC General EHS Guidelines
81	C	Women employment and non-discrimination and equal opportunity	COK A.S. will follow Turkish law, while applying equal opportunities to women in all other branches where law does not prohibit women workers. Further measures will be put in place to encourage female participation in non-employee workforce, such as providing specific training where required, enabling flexibility and job-sharing opportunities for women with children to participate	Labour and Working Conditions	During construction	ESIA	Vol III. Ch. 3.3 Vol II. Ch. 7	Employment Policy	HR & Worker Management Plan	Whole Project	
82	C, O	Child and forced labour controls.	COK A.S. will not employ nor permit any subcontractor to use child labour, and in accordance with Turkish legislation, any person under the age of 18 may not be assigned to any hazardous work within the Project. Workers under 18 if any will usually be involved in an apprenticeship role; however the minimum age in any case will be 15 years. Workers will be hired only after a legitimate proof of age is presented that meets the local age qualification laws.	Labour and Working Conditions	• 2 months before the schedule commencement of construction; • During construction; • During operations.	ESIA	Vol III. Ch. 3.3 Vol II. Ch. 7	Employment Policy	HR & Worker Management Plan, Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	
83	C	Emergency Prevention and Response Plan (EPR Plan)	COK A.S. will prepare, during the current design stage, an Emergency Prevention and Response Plan (EPR Plan) applicable to spill containment and clean-up incidents on land and in the marine environment. The EPR Plan will apply to marine incidents stemming from construction vessels, eg spillage of oils or fuels into the DS waters due to leaks or collision damage. Any major spills into the DS waters (e.g. due to collisions of large commercial vessels or severe accident on the bridge) will primarily be handled by the General Directorate of Coastal Safety and Salvage Administration, which has emergency equipment and responds to emergency incidents with the order of the Board of the Port Authority Harbour Master. In addition, there is a private organization (MARE-Marine Clean-Up Services) in the DS, which was established by the 20 coastal facilities. Therefore, COK A.S. will not be obliged to maintain its own fleet of clean-up/rescue vessels to respond to potential maritime incidents. The EPR Plan will include, among others, the following topics: • A spillage risk assessment in accordance with the UK Design Manual for Roads and Bridges (DMRB); • Based on the results of the risk assessment (and in conformance with statutory requirements), design of spill prevention/containment structures around sensitive equipment, installation of appropriate spill cleanup equipment and development of response procedures; • Training of contractor staff on spill prevention and response; • Emergency communication procedures with local authorities.	Marine Physical	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Emergency Response Plan, Environmental Management Plan, Marine Safety for Tower Foundation Procedure	Whole Project	
84	C, O	Employment terms and conditions.	COK A.S. will provide, as per Turkish Labor Law, workers the right of collective bargaining and forming a union/related organization.	Labour and Working Conditions	• 2 months before the schedule commencement of construction; • During construction; • During operations.	ESIA	Vol III. Ch. 3.3 Vol II. Ch. 7	Employment Policy	HR & Worker Management Plan, Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	

85	P, C, O	Navigational risk assessment study.	<p>COK A.S. will undertake a navigational risk assessment study following which the effectiveness of the existing and proposed TSS system can be incorporated into the impact significance. Engineering studies and security corridor technical assessment addressing the safe approach of levels will be performed to assess what tower access limits there will be for construction and operation. The magnitude of the impact will be assessed following the results of the navigational risk assessment. The scope of the risk assessment will include:</p> <ul style="list-style-type: none"> • The baseline data, hazard identification, hazard ranking, ALARP assessment, hazard log, ALARP statement • A clear identification of all potential sources of risk (e.g. construction/ operation risks, risks of third party vessel - vessel collision, project vessel - third party vessel collision, third party or project vessel collision with temporary and permanent infrastructure, whether there are different risks to different types of third party vessel, risks to marine biodiversity). • Identification of different types of risk (e.g. anchorages, risk of drifting craft in adverse weather, dangers to smaller craft in larger shipping lane etc. • Management actions required by different parties will be clearly identified clearly (e.g. what risks will be mitigated by actions of the authorities in charge of shipping safety in the channel, what actions will need to be taken by third party vessels, what actions need to be taken by Project vessels). <p>The bridge designers will coordinate installation of relevant equipment to mark the main channel centreline (as will be supplied by the relevant authorities and installed under their direction), as well as warning lights to mark the tower piers and pier protection structures. All the process will be managed by Port Authority, KGM and other relevant authorities. COK A.S. will need to inform the port authority of the overall planned construction schedule. Prior to start of construction, COK A.S. will need to identify together with the port authority the restricted access zones around the construction vessels, tower structures and southern anchorage, and clarify enforcement of these zones by the port authorities.</p> <p>The management of navigation risk in the Straits (including the Project Area) falls primarily under the responsibility of the Undersecretaries of Maritime Affairs and port authorities via the full implementation of the TSS, application of pilotage procedures for ships passing through the strait, and placement of marine markers, buoys, and lights to indicate hazards and obstructions to navigation.</p>	Marine Physical; Biodiversity and Conservation	<ul style="list-style-type: none"> • 2 months before the schedule commencement of construction; • During construction; • During operations. 	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Marine Safety for Tower Foundation Procedure	Dardanelles Strait.	
86	P, O	Undertaking pre-construction scour surveys along the bridge piers.	COK A.S. will undertake pre-construction scour surveys along the bridge piers and, depending on the level of risk, a program of mitigation measures will be implemented. Potential mitigation measures may include mattresses, rip-rap around the foundation of the footings. Potential bathymetric changes in other parts of the Dardanelles Strait (DS) will not be assessed. It is likely that some scoured material may be deposited somewhere else, the flow currents at the bottom of the DS indicate that scouring impacts may be negligible.	Marine Physical	<ul style="list-style-type: none"> • 2 months before the schedule commencement of construction; • During operations. 	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	HR & Worker Management Plan, Environmental Management Plan	Bridge.	
87	P/C/O	Workers Code of conduct	COKI A.S. is to develop the Code of Conduct and discipline procedure and other key controls to be used for to ensure appropriate behaviour of the workforce	Socio economic; Labour & working conditions	2 months before the schedule commencement of construction	ESIA	Vol II ch. 7	Employment Policy	HR & Worker CMP, occupational H&S& security management plan	Whole Project	
88	C	Mitigation measures for impacts on water flow due to disruption to flooding controls and irrigation systems.	Compensation for businesses and households will be made available in the event that water flow is unexpectedly disrupted by project related activities.	Socio economic	During construction	ESIA	Vol III. Ch. 3.1 Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Land Acquisition, Compensation & Resettlement Framework	Stakeholder Engagement and Grievance Mechanism Procedure, Environmental Management Plan	Whole Project	
89	C	Security Personnel	Complaints by the public (or other workers) with respect to behaviour of Security Personnel can be made via the Grievance Procedures for public and workers (see ESMS).	Community Health and Safety	During construction	ESIA	Vol III. Ch. 3.4 Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Management Plan	Whole Project	
90	C	Complaints about workforce	Complaints by the public (or other workers) with respect to behaviour of the workforce can be made via the Grievance Procedures for public and workers (see Chapter ESMS).	Community Health and Safety	During construction	ESIA	Vol III. Ch. 3.4 Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Occupational H&S Plan	Whole Project	
91	C	Sediment plume	Confined disposal facilities will be used, either nearshore or upland, when open water disposal is not feasible or desirable.	Biodiversity and Conservation	During construction.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Environmental Management Plan	Bridge	

92	C	Borders	Construction crew will be trained to stay within the border of the construction areas and expropriation corridor	Displacement of Existing Land, Use, Property and People	During construction	ESIA	Vol III. Ch. 3.2 Vol II. Ch. 9	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	
93	C	Contaminated soil	Construction crews will be trained to determine contaminated areas of soil during earthworks. Any contaminated soil/waste encountered during construction will be reported to the local authorities in all cases and other measures will be taken as agreed with the competent authorities and local authorities. A protective cover for the lightly soiled material in place will be placed. More severely affected soils and sludges will be removed from the site for proper treatment and / or destruction in licensed waste areas, as appropriate.	Geology, Soils and Contaminated Land	During construction	ESIA	Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, HR & Worker Management Plan, HR & Worker Management Plan	Whole Project	
94	C	Surface and Groundwater Quality	Construction equipment will be cleaned away from surface waters.	Terrestrial Water Environment	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	
95	C	General Construction	Construction materials from quarries will be purchased and provided in accordance with national Mining Law. The Project will prepare a checklist to confirm regulatory compliance and this checklist will be used for all quarry purchases, orders and deliveries. Records of all checklists will be maintained by the Project for inspection.	Displacement of Existing Land, Use, Property and People; Socio economic	During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	
96	C	Cooperation with the local government and stakeholder.	Cooperation with groups (e.g. local NGOs and schools), health awareness trainings amongst the workers, training of health workers in disease treatment, the provision of health services and performing immunisation programmes for workers will also be undertaken to minimise the risks of the spread of STDs and other communicable diseases in the local communities.	Community Health and Safety	During construction	ESIA	Vol III. Ch. 3.4 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, HR & Worker Management Plan, Environmental Management Plan, Occupational H&S Plan, Community H&S&Security Management Plan	Whole Project	
97	C	Watercourse crossings	Culverts constructed at watercourse crossings will be designed so as not to disrupt free movement of freshwater fauna and to allow fish crossing (i.e. bottomless culverts). These are to be implemented through a Watercourse Crossing Plan.	Biodiversity and Conservation	During construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Watercourse Crossing Plan	KP 110+500, KP 131+000, KP 135+500, KP 141+000, KP 148+000, KP 178+500, KP 196+500 and KP 198+500	
98	C, O	Socio-Economic	Decisions of the Central Hunting Commission of 2016-2017 and provisions of the Land Hunting Law will be complied with. The Project will undertake consultation with the Central Hunting Commission (and other authorities, if needed) to confirm these requirements. This consultation meeting will be undertaken 2 months before the commencement of construction.	Socio Economics; Displacement of Existing Land, Use, Property and People	•During construction; •During operations.	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	
99	C	Following the Decisions of the Directorate of Regional Board of Protection of Cultural Property of Canakkale	Decisions of the Directorate of Regional Board of Protection of Cultural Property of Canakkale from 14.03.2016 and numbered 2830 will be followed during Project works.	Archaeology and Built Heritage	During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure, Change Management Plan	Stakeholder Engagement and Grievance Mechanism Procedure, Cultural Heritage Management Plan	Whole Project	
100	C	Adherence to the Decisions of the Directorate of Regional Board of Protection of Cultural Property	Decisions of the Directorate of Regional Board of Protection of Cultural Property of Canakkale from 14.03.2016 and numbered 2830 will be followed during Project works. This is in line with Turkish Law.	Archaeology and Built Heritage	During construction	EIA	Vol III. Ch. 3.5 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Cultural Heritage Management Plan	Whole Project	
101	C	Control vibrations at quarry sites.	Delayed, micro-delayed, or electronic detonators will be used to reduce individual charge mass to safe limits where possible. At quarry sites, and if blasting is required during earthworks, close monitoring/supervision will be undertaken to ensure that legislative requirements and blasting permit conditions are complied with; if the standards are exceeded additional measures will be taken to reduce vibration impacts.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Quarries Management Plan	Near settlements	

102	C	Ecological field survey.	Depending in the results of the shearwater surveys the following will be considered: <ul style="list-style-type: none"> • Bridge cables and support columns to be flood-lit to increase their visibility at night • floodlights in the supporting towers basis and extra lightning on the main supporting cables • No power lines should be suspended above the bridge deck • Standard highway lighting will increase visibility of the top of the deck to birds that fly over the bridge at night • Undersurface of the bridge should be lit to increase visibility of the piers and deck undersurface to birds that fly beneath the bridge at night • Bridge management and maintenance personnel should be required to collect and report all cases of bird mortality on the bridge, should this type of events occur. 	Biodiversity and Conservation	During construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan	Canakkale Strait IBA protected area.	
103	P, C	General Construction	Detailed Project design-development and amendments to the design as presented in the ESIA will not impact or restrict existing and proposed tourist sites and areas. The Project will identify and engage with the relevant authorities for each tourist area for design input, where required.	Displacement of Existing Land, Use, Property and People; Socio economic	• 2 months before the schedule commencement of construction; • During construction	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Change Management Plan	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	
104	C	Hazardous materials	Details with respect to the anticipated quantities of hazardous materials on site and exactly where which materials are stored will be elaborated in the detailed site layout and management plans by the EPC Contractor.	Community Health and Safety	During construction	ESIA	Vol III. Ch. 3.4 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Control of Substances Hazardous to Health Procedure	Whole Project	
105	C	Occupational Health and Safety	Dismantling, loading and transporting will be temporarily stopped while the blasting process is being carried out in order to ensure that blasting processes do not pose any hazards to the workers. Unauthorised and dangerous blasting procedures will not be undertaken	Community Health and Safety	During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Occupational Health & Safety Plan, Biodiversity Action Plan, Environmental Management Plan	Whole Project	
106	C, O	Dissemination of Findings (Publication).	Dissemination of Findings (Publication): The sharing of information obtained through the course of investigations and studies to the wider public, both in academic and general form, can reduce the impact on the Cultural Heritage through raising awareness of the asset and its value. This is in line with IFC Performance Standard 8 and the Cultural Heritage Management Plan. Details will be outlined in Cultural Heritage Management Plan.	Archaeology and Built Heritage	• During construction; • During operations.	ESIA	Vol III. Ch. 3.5 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Cultural Heritage Management Plan	Whole Project (onshore).	
107	C	Surface and Groundwater Quality	Drainage from excavations will be collected and settled to remove suspended materials prior to discharge in accordance with required permits. If physically possible, local perimeter drains will be constructed around working areas to collect potentially suspended run-off and direct it to a system of settlement basins before discharge in accordance with required permits.	Terrestrial Water Environment	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Quarry and Associated Facilities Management Plan	Whole Project	
108	C	Dredging	Dredged area will be reduced to as small as reasonably practicable by opting for the design option with the smallest dredging footprint and least environmental consequences.	Marine Physical	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Marine Safety for Tower Foundation Procedure	Marine part of project	
109	C	Surface Water Bodies and Water Infrastructure (Channels)	Driving within rivers, streams or on their banks will be forbidden except if unavoidable to construct a particular structure. Then appropriate measures will be implemented to protect the sensitive areas, for example by placing with metal plates to drive on.	Terrestrial Water Environment	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Watercourse Crossing Plan	Whole Project	
110	C, O	Housing insulation.	During Project-related rehabilitation and refurbishing works, specific acoustic insulation and related mitigation measures will be considered on a case-by-case basis (e.g. housing isolation, sound proofing of windows and walls).	Noise and Vibration	• During construction; • During operations	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Near settlements	
111	C	Socio-Economic	During the construction phase of the Project, 'Allocation purpose change' will be undertaken in accordance with Article 14 of the Pasture Law No. 4342. The relevant land registry records will be updated and revised as required.	Socio Economics; Displacement of Existing Land, Use, Property and People	During construction	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Land Acquisition, Compensation & Resettlement Framework	Stakeholder Engagement and Grievance Mechanism Procedure, HR & Worker Management Plan	Whole Project	
112	P	Technical assessment on flood	During the design stage, a technical assessment will be undertaken to assess a number of issues including: the review of the selection of the flood return periods across the range 100 – 500 for the bridges, justify for the return periods used for the culverts and bridges in comparison to the KGM Technical Specifications (2006), ensure that the river function of sediment transport is not adversely affected, bedload sediment transport been considered in the design of water crossings. The above procedures and plans will be integrated into the process for deciding the layout of all construction sites, work and camp areas. COK A.S. will review the implementation of these plans.	Terrestrial Water Environment	During design stage/ 2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Watercourse Crossing Plan	Whole Project	

113	C	Labour	<p>During the tunnel excavations, adequate air ventilation, lighting and drainage will be uninterruptedly provided to ensure the safety of all workers.</p> <p>Air ventilation systems will meet the minimum international safety standards and requirements.</p> <p>Back-up generators, dewatering/drainage pumps, pipes and hand lamps will be kept available at all times in sufficient numbers and capacities at the tunnel excavation work sites.</p> <p>Accumulation of water within the tunnels will be strictly prevented.</p>	Community Health and Safety; Labour and Working Conditions.	During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Occupational Health & Safety Plan, Biodiversity Action Plan, Environmental Management Plan	Whole Project	
114	O	Community Health and Safety	Embedded design measures to mitigate the risk associated with accidental access to the motorway will be implemented. These can include the construction and maintenance of permanent obstacles (including wire fence) along the Motorway.	Community Health and Safety	During operations	ESIA	Vol II. Ch. 7	Environmental and Social Management Plan	Community H&S&Security Management Plan	Whole Project	
115	C	Emergency Prevention and Response Plan (EPRP) for Spill Containment and Clean-up	<p>Emergency Prevention and Response Plan (EPRP) for Spill Containment and Clean-up, engineering contingencies, marine collisions and other emergencies (e.g. natural hazards) should be prepared. The EPRP to include:</p> <ul style="list-style-type: none"> • The emergency response in the event of spills, fire, accidents, earthquake, flood; • A spillage risk assessment will be undertaken in accordance with the UK Design Manual for Roads and Bridges (DMRB) for operation phase; • Where medical rescue and fire-fighting resources and spill response equipment will be available along the route. Locations to be informed by the spill risk assessment for operation phase; • Procedure for staff and subcontractors to report any incidents and the investigation, remediation and preventive actions taken; • Regular emergency response training including in the use of spill response equipment; • Emergency Communication Procedure including with local communities and authorities. <p>Contractors and Sub-Contractors will develop and prepare site-specific EPRPs in line with this overarching plan.</p> <p>The EPRP will be updated and expanded as needed for implementation in the Operation Phase of the Motorway.</p> <p>Effective implementation of the measures/actions that will be defined in the EPRP, emergency situations can be controlled without causing significant risks and/or impacts on the health and safety of the Project personnel as well as local communities.</p> <p>Relevant emergency preparedness and response measures will be taken during emergency situations arising at the construction/work sites and Camp Sites. The labours will be informed about Emergency action plan against any accident, fire, sabotage, natural disaster and so on.</p>	Geology, Soils and Contaminated Land, Community Health & Safety, Labour & working conditions	During construction	ESIA	Vol III. Ch. 3.3 Vol II. Ch. 7	Environmental and Social Management Plan	Emergency Response Plan, Occupational Health & Safety Plan	Whole Project	
116	P,C,O	Community engagement	Engagement will be maintained by COK A.S. with Affected Communities, including host communities, through the process of stakeholder engagement and the CLOs	Displacement of Existing Land, Use, Property and People	<ul style="list-style-type: none"> • 2 months before the schedule commencement of construction; • During construction; • During operations. 	ESIA	Vol III. Ch. 3.2 Vol II. Ch. 13	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Land Acquisition, Compensation & Resettlement Framework	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	
117	C	Critical area (viaducts and overpasses)	Engineering structures may be subject to the settlement and liquefaction problem. The Project will therefore implement a piled footing system.	Geology, Soils and Contaminated Land	During construction	ESIA	Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Soil erosion, Reinstatement and Landscape Management Plan	KM 177+500; KM 177+799; KM 178+279; KM 178+958; KM 179+454	
118	C	Critical area (viaducts and overpass)	Engineering structures such as viaducts and overpasses may be subject to the settlement problem due to the high groundwater level and silt-sand units which pose a high risk for ground liquefaction. It is therefore recommended that the Project implement a piled footing system.	Geology, Soils and Contaminated Land	During construction	ESIA	Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Soil erosion, Reinstatement and Landscape Management Plan	KM 115+318 - 116+439 KM 133+765; KM 152+094; KM 154+084; KM 160+380	
119	C	Environmental Management Plan (EMP - Marine)	<p>Environmental Management Plan (EMP - Marine) to be required from the contractors prior to construction will need provisions that ensure that:</p> <ul style="list-style-type: none"> • no wastes will be disposed of from the vessels into the DS; • the allocation and correct use of safe waste disposal sites from vessels and within the Project site will be in accordance with Lender Requirements and will be monitored, including for the collection and temporary storage of hazardous waste; • waste containers that do not allow leakage or dispersal of contents will be installed and their correct use will be monitored; • waste containers will be appropriately labelled to separate waste types; • waste streams will be regularly assessed in terms of waste types and quantities in order to evaluate whether additional reuse and recycling methods may be applied; and • the handling, transport and disposal of hazardous waste within the Project site and to third 	Marine Physical	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan		Whole Project	

120	C	Soil Management	<p>Environmental Management Plan including the Soil protection will cover the preventative and mitigation measures to minimize and manage the effects on soil and water quality during construction. The procedure will include erosion, sediment and pollution control, management of upper soil, as well as storm water run-off.</p> <ul style="list-style-type: none"> • Spoil and soil storage areas and open stores of construction materials will be designed and managed to control loss of sediments into run-off by minimizing the length and angle of slopes. • Schemes to prevent new eruption of ground surface from rainfall erosion or to avoid construction activities during periods of heavy rainfall. • Contouring and minimise the length and the steepness of the slopes. • Local control measures such as sediment fences, control dams, mulch barracks and sludge traps, as well as line inspections such as sediment basins from construction sites. • Diversion of external 'clean' runoff around the construction area to prevent mixing of 'clean' and 'dirty' runoff and reduce the size of the required sediment basins. • Conveyance of all 'dirty' runoff to the proposed sediment basins. • Establishment of barrier fences and / or markings to determine the extent of the structure / work area that may be damaged. • Installation of controls to trap sediments, including but not limited to, sediment fences, rock groynes, geofabric barriers and hay bales. • Limitation of the exposure to the soil and the minimum amount of deterioration required for the construction. • Covering and protection of the degraded fertile ground by soil, vegetation, mulch or erosion-resistant material. • Construction of all drainage structures (e.g. culverts, sediment basins and catch drains) should be established as early as possible. • Existing drainage and irrigation channels, sediment barriers, green areas, protection strips, such as drains and drainage and erosion control pits should be protected by taking appropriate 	Geology, Soils and Contaminated Land	During construction	ESIA	Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Soil erosion, Reinstatement and Landscape Management Plan Environmental Management Plan	Whole Project	
121	C	Community impacts and engagement	EPC Contractor will identify potential impacts on communities and businesses from these relocation works and identify measures to avoid, minimise or otherwise mitigate impacts and their effects. Include commitment to informing affected communities and businesses in advance of any disruption to services.	Displacement of Existing Land, Use, Property and People	During construction	ESIA	Vol II ch. 2	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Land Acquisition, Compensation & Resettlement Framework	Stakeholder Engagement and Grievance Mechanism Procedure, Environmental Management Plan	Whole Project	
122	C	Noise barriers.	<p>Excavated material will be stored between the construction site and sensitive receptors (e.g. hospitals, nursing homes, schools and other education facilities) to form a noise barrier (with cover to avoid dust erosion)</p> <p><i>Installation of other (temporary) noise barriers will be used if necessary</i></p>	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, HR & Worker Management Plan, Biodiversity Action Plan	Near settlements	
123	C	Waste and Wastewater	<p>Excavation waste will be disposed in accordance with the 'Regulation on Control of Excavation Soil, Construction and Demolishing Waste' and a consideration of the results from required waste testing and analyses.</p> <p>COK A.S./ EPC will prepare an Soil Erosion, Reinstatement and Landscape Management Plan in accordance with Turkish laws, IFC guidelines and international environmental management systems.</p> <p>Re-use of excavated soils in the Project area as far as possible and seek alternative uses of surplus spoil where practicable (eg landscaping and earth works for other projects) to minimise the requirements for off-site disposal COK A.S.</p>	Resources and Waste	During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	
124	C	Temporary protective fencing before work commences on site.	Existing vegetation to be protected will be fenced with temporary protective fencing before work commences on site, so that as much vegetation as possible is protected to maintain the integrity of the landscape and the existing visual screening.	Landscape and Visual	During construction	ESIA	Vol III. Ch. 2.7 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Soil erosion, Reinstatement and Landscape Management Plan, Environmental Management Plan	Whole Project	
125	P, C	Land Acquisition	<p>Expropriation requirements and related activities for private lands will be done in accordance with Expropriation Law.</p> <p>If people living in the project area are required to move to another location, displaced persons will be offered cash compensation in accordance with standard KGM policy and in line with the Turkish Expropriation Law.</p>	Displacement of Existing Land, Use, Property and People	During pre-construction and construction	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Land Acquisition, Compensation & Resettlement Framework	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	

126	P, C	Avoidance (design change); Preservation by Record (excavation & recording).	For assets where a Moderate impact is predicted, Avoidance (design change) is recommended. If this is not possible, then Preservation by Record should be undertaken. This is in line with Turkish Law, IFC Performance Standard 8 and the Cultural Heritage Management Plan.	Archaeology and Built Heritage	<ul style="list-style-type: none"> • 2 months before the schedule commencement of construction; • During construction 	ESIA	Vol III. Ch. 3.5 Vol II. Ch. 7	Change Management Plan	Stakeholder Engagement and Grievance Mechanism Procedure, Cultural Heritage Management Plan	<ul style="list-style-type: none"> 1. Hacıdönmenin Sırtı site - Sındal (KM 192+000 – 191+844); 2. Yıldız Tabyası X site - Güneyli (KM 160+290-160+000); 3. Kocadere site - Yüllüce (KM 131+704 – 131+135); 4. Menekşe Ağıl Tepesi site - Çimendere (KM 115+512 – 115+360); 5. Korugan 21 site - Kavakköy (KM 145+232).
127	P, C	Watching Brief (archaeological monitoring);	For assets where a Small or Negligible impact is predicted, Watching Brief (archaeological monitoring) should be undertaken. For areas where there is a risk of cultural heritage material being uncovered (such as in Marine environments or areas identified by the Archaeological Risk Model), Watching Brief (archaeological monitoring) should be undertaken. This is in line with Turkish Law, IFC Performance Standard 8 and the Cultural Heritage Management Plan.	Archaeology and Built Heritage	<ul style="list-style-type: none"> • 2 months before the schedule commencement of construction; • During construction 	ESIA	Vol III. Ch. 3.5 Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Cultural Heritage Management Plan	<ul style="list-style-type: none"> 1. Tescilli Alan 1 site - Kocaveli (KM 186+950 – 186+687); 2. Tescilli Alan 2 site - Kocaveli (KM 185+950 - 185+770); 3. Münipbey Deresi Köprüsü site - Cevizli (KM 178+500 Access Road KM 1+750); 4. Korugan 1 site - Güneyli (KM 161+325); 5. Korugan 2 site - Güneyli (KM 161+325); 6. Korugan 3 site - Güneyli (KM 161+325); 7. Korugan 4 site - Güneyli (KM 160+500); 8. Korugan 5 site - Güneyli (KM 160+500); 9. Korugan 6 site - Güneyli (KM 160+500); 10. Korugan 7 site - Güneyli (KM 160+500); 11. Korugan 9 site - Güneyli (KM 159+870); 12. Korugan 10 site - Güneyli (KM
128	P	Private land and legal process	For exceptional cases when the privately-owned land has to be used but the expropriation or court processes have not been finalized yet, no work will be started until bilateral agreements are settled and official consent letters are taken from the legal owners. In such cases, official commitment letters will be provided to legal owners by the Project Sponsors regarding the scope of works and compensation of probable damages and the works will be conducted in accordance with those consent and commitment letters.	Displacement of Existing Land, Use, Property and People	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 3.2 Vol II. Ch. 10	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Land Acquisition, Compensation & Resettlement Framework	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project

129	C	Compliance with the Mining Activities Implementation Regulation.	For quarry and borrow pit sites, measures will be taken to ascertain compliance with the Mining Activities Implementation Regulation (Madencilik Faaliyetleri Uygulama Yönetmeliği; Official Gazette Date/Number: 6.11.2010/27751) according to which a minimum (horizontal) distance of 300 m is required between a quarry and other land uses that have been approved under a zoning plan.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Quarries and AF Management Plan	Whole Project	
130	P	Local access	For the pasturelands that will be separated by the Motorway (fragmentation of land), impacts on the public users of the pasturelands will be mitigated by ensuring access between severed lands. In this scope, culverts, underpasses and over bridges have already been included in the design. However, additional passage ways that will be requested by local communities will be considered by COK A.S. if feasible and subject to KGM approval for design revision.	Displacement of Existing Land, Use, Property and People	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 3.2 Vol II. Ch. 18	Change Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Biodiversity Action Plan, Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	
131	O	Warning signs.	For wild fauna species identified as Medium sensitivity, the Project will erect warning signs along the motorway to advise drivers about the risk of collision.	Biodiversity and Conservation	During operations.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Transport Control & Site Access Procedure	<ul style="list-style-type: none"> • The proximity of the surface water features (KP 110+500, KP 131+000, KP 135+500, KP 141+000, KP 148+000, KP 178+500, and KP 188+500), where the presence of amphibians may be higher. • Other identified areas with a more intense presence of fauna has been identified: KP 108+500, KP 132+500, KP 137+500, KP 143+000, KP 155+000, , KP 195+500 and KP 187+500 	
132	C	Surface Water Bodies and Water Infrastructure (Channels)	Foundation works for the bridges, viaducts, retaining walls and other structures at or close to particularly sensitive surface water bodies will not take place in areas where the water levels will rise during the high-water season.	Terrestrial Water Environment	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Watercourse Crossing Plan	Whole Project	
133	P	Further Baseline Studies	Further studies (such as additional remote sensing, more in-depth historical research, further field walking surveys of those areas not previously visited, additional site surveys (including geophysical surveys) of known archaeological sites within the construction boundary) will be undertaken as soon as possible to enhance the existing baseline data and to eliminate gaps. This will ensure that significant sites are identified and will allow them to be avoided or have further site specific mitigation to be proposed. Permission will be sought to survey previously inaccessible land, and any further field walking survey will be undertaken using a minimum transect spacing of 20m. These new baseline studies will be undertaken as soon as possible so as to allow sufficient time for any archaeological excavation to be undertaken in all areas where excavation is identified as being possible or required, prior to construction. This is in line IFC Performance Standard 8	Archaeology and Built Heritage	As soon as possible/ 2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 3.5 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Cultural Heritage Management Plan	Whole Project (onshore sections).	

134	C	Workers' accommodation	<p>General measures to be taken at the workers' accommodation facilities (IFC Environmental, Health, and Safety General Guidelines, 2017) will be as follows:</p> <ul style="list-style-type: none"> • The accommodation to be provided will be clean and safe and meet the basic needs of workers, providing minimum amounts of space for each worker; sanitary, laundry and cooking facilities. Overcrowding will be avoided. • Heating, air-conditioning and ventilation will be appropriate for the climatic conditions and provide workers with a comfortable and healthy environment to rest and spend their spare time. • Drinking water to be provided to Project workforce and water to be supplied to food preparation, washing and bathing areas will meet the requirements of the Turkish Regulation Concerning Water Intended for Human Consumption. • Adequate lavatory facilities (toilets, urinals, washbasins and showers) will be provided for the number of people expected to work in the facility and allowances will make for indicating whether the toilet facility is "In Use" or "Vacant". Toilet facilities will also be provided with adequate supplies of hot and cold running water, soap, and hand drying devices. • Domestic wastewater and waste to be produced at Camp Sites will be properly managed and disposed of in line with the requirements of relevant Turkish regulations as well as good site practices described in this ESIA. • First aid and medical facilities as well as provisions for safety against potential hazards (fire, etc.) will be provided at the camp sites. • Residents of the Camp Sites will be made aware of any rules governing the accommodation. • Project's Grievance Mechanism to be established will provide means to the Project personnel to lodge their complaints. COK A.S. will ensure that the workers are informed of the grievance mechanism at the time of recruitment and make it easily accessible to them. • There will be infirmary and domestic wastewater treatment plant and leisure centre in the construction site. 	Labour and Working Conditions	During construction	ESIA	Vol III. Ch. 3.3 Vol II. Ch. 7	Environmental and Social Management Plan	HR & Worker Management Plan, Occupational Health & Safety Plan	Whole Project	
135	C	Groundwater from any temporary dewatering measures during construction will be drained to a nearby surface water course.	Groundwater from any temporary dewatering measures during construction will be drained to a nearby surface water course. The turbidity has to be monitored and if needed a settling tank (or similar structure) utilised to reduce turbidity prior to discharge. In addition, there is the possibility of risks of excavation groundwaters being contaminated by chemicals (e.g. from grouting) or cementitious materials. The contact of the dewatered groundwater with potential chemicals will not be allowed by appropriate sealing mechanisms (enclosed conveyance of the extracted groundwater to the settlement structures). Discharges will be periodic tested to meet Turkish and international standards (eg. IFC General EHS Guidelines, EU standards). It is understood that no permanent dewatering will be necessary for this Project.	Terrestrial Water Environment	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Watercourse Crossing Plan	Whole Project	
136	C	Surface and Groundwater Quality	Hazardous materials will not be stored in excavated areas and all handling of all hazardous materials will be in accordance with the Hazardous Materials Management Procedure. These procedures will be in line with Environmental, Health, and Safety (EHS) Guidelines: Environmental Hazardous Material Management (IFC, 2007). As example secondary containment structures will consist of berms, dikes, or walls capable of containing the larger of 110 percent of the largest tank or 25% percent of the combined tank volumes in areas where hazardous materials are handled (e.g. fuel stores and loading areas, concrete mixing, hazardous material stores) to prevent hazardous materials entering the site drainage.	Terrestrial Water Environment	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Control of Substances Hazardous to Health Procedure	Whole Project	
137	C	Sediment plume	Hazardous sediments (if found) will be dredged by closed environmental buckets and transported to a suitable site for disposal. These sediments will be permanently capped upon the completion of disposal operations.	Biodiversity and Conservation	During construction.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Environmental Management Plan, Marine Safety for Tower Foundation Procedure	Bridge	
138	C	Private land complaints	If complaints related with unauthorized use of privately-owned lands, damages on adjacent lands, etc. are received through Project's Grievance and Comment Mechanism, evaluation/inquiry will be conducted on a case-by-case and where necessary, corrective actions will be planned and implemented.	Displacement of Existing Land, Use, Property and People	During construction	ESIA	Vol III. Ch. 3.2 Vol II. Ch. 11	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Land Acquisition, Compensation & Resettlement Framework	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	

139	P	Avoidance (route change).	<p>If Cultural Heritage assets are identified in Project construction footprint:</p> <p>First preference mitigation measures should be avoidance (route change): By changing the route of the scheme, Cultural Heritage assets can be removed from the impact of the scheme. This will allow the asset to be avoided and the significance of impact to be reduced.</p> <p>Where avoidance through changing the route is not a possibility, then avoidance through design changes should be considered. This measure will allow clever engineering design to minimise or eliminate predicted impacts on the assets.</p> <p>Where avoidance (both route change and design change) is not possible, then the asset should be preserved by recording through scientific study to international best practice in coordination with relevant authorities. In the case of an archaeological site this would be by means of archaeological excavation, or with built heritage through building survey and recording. If preservation by record is deemed the only suitable mitigation, then a number of processes should precede the excavation to fully understand the site. These include Geophysical / remote-sensing surveys (to fully establish the limits of the site) and pre-development Test Excavation (to determine the depth and nature of deposits).</p> <p>These mitigation measures are subject to approval of KGM and relevant authorities. This is in line with Turkish Law, IFC Performance Standard 8 and the Cultural Heritage Management Plan.</p>	Archaeology and Built Heritage	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 3.5 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure, Change Management Plan	Stakeholder Engagement and Grievance Mechanism Procedure, Cultural Heritage Management Plan	<p>Whole Project (onshore & offshore).</p> <p>1. Tütünlük Mevkii site - Suluca (KM 187+620 – 187+300);</p> <p>2. Karayarkı Sırtı site - Kocaveli (KM 188+520 - 188+382);</p> <p>3. Lapseki Alan 3 site - Kocaveli (KM 188+000 Access Road (0+600-0+700));</p> <p>4. Lapseki Alan 1 site - Kocaveli (KM 187+050 - 186+760);</p> <p>5. Gelibolu Alan 2 - Sütüğe (KM 178+500 Access Road (159+000));</p> <p>6. Gelibolu Alan 1 site - Gelibolu / Sütüğe (KM 179+425 – 178+600);</p> <p>7. Korugan 8 site - Güneyli (KM 160+076);</p> <p>8. Domuz Deresi Mevkii site - Bolayır (KM 159+050 - 158+900);</p> <p>9. Gelibolu Alan 3 site - Koruköy (KM 148+050 - 147+770);</p>
140	C	Gradual vegetation clearance.	If possible, gradual and phased vegetation clearance will be conducted, to enable fauna to move to other areas. The Ecological Clerk of Works (ECOW) will be employed to manage and monitor with construction clearance.	Biodiversity and Conservation	During construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan	Whole Project, where is the case.
141	P	Greenhouse gases	If Project emissions may potentially exceed 100,000 t CO2 (in Scope 1 and 2, in a given year) Project will update and review the current GHG emission calculations to determine if an Alternatives Assessment is warranted. IF triggered, the Alternatives	Air and Climatic Factors	iun.18	ESIA	Vol III. Ch. 2.5 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project
142	C	Surface Water Bodies and Water Infrastructure (Channels)	If technically feasible small drains within the construction area will be covered with metal plates which can be passed over by construction machines, to protect them against disturbance, or conveyed to have free flow through the pipes placed for this purpose.	Terrestrial Water Environment	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Watercourse Crossing Plan	Whole Project
143	P	Agricultural impacts	Impacts to agricultural and pasture lands will be minimised as far as possible by keeping the Project construction footprint as narrow as possible, and efficiently restoring any damaged areas.	Displacement of Existing Land, Use, Property and People	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 3.2 Vol II. Ch. 26	Environmental and Social Management Plan, Change Management Plan, Land Acquisition, Compensation & Resettlement Framework	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project
144	P	Permitting - food agriculture authorities	<p>In accordance with Law on Reclamation of Olive Cultivation and Graft of Wild Ones, prior written permission and related permits will be obtained from Provincial Directorates of Food Agriculture and Livestock before the commencement of construction.</p> <p>Such permits will be obtained 2 months before the commencement of construction works.</p> <p>The Project will undertake a formal consultation meeting with these authorities to confirm the scope and requirements of these permits.</p>	Displacement of Existing Land, Use, Property and People	2 months before the schedule commencement of construction.	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project

145	P	Permitting - municipalities	In accordance with Metropolitan Municipality Law (number 5216), prior written permission will be obtained from Tekirdag Metropolitan Municipality and Canakkale Municipality before the commencement of construction. Such permits will be obtained 2 months before the commencement of construction works. The Project will undertake a formal consultation meeting with these authorities to confirm the scope and requirements of these permits.		2 months before the schedule commencement of construction.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure, Change Management Plan	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	
146	P	Permitting - food agriculture authorities	In accordance with the 'Regulation on Protection and Usage of Agricultural Lands', prior written permission and related agricultural land permits will be obtained from the Directorate of Provincial Food Agriculture and Livestock of the Çanakkale and Tekirdağ Provinces before the commencement of construction. Such final permits will be obtained 2 months before the commencement of construction works. The Project will undertake a formal consultation meeting with these authorities to confirm the scope and requirements of these permits.	Displacement of Existing Land, Use, Property and People	2 months before the schedule commencement of construction.	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	
147	P	Permitting - forest areas	In accordance with the Forest Law, prior written permission and related permits (preliminary and final) will be obtained for all impacted forested areas from the relevant authority before the commencement of construction. Such final permits will be obtained 2 months before the commencement of construction works. The Project will undertake a formal consultation meeting with these authorities to confirm the scope and requirements of these permits.	Displacement of Existing Land, Use, Property and People	2 months before the schedule commencement of construction.	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	
148	P	Permitting - food agriculture authorities	In accordance with the Pasture Law, prior written permission and related pasture and permits will be obtained from the relevant authority before the commencement of construction. Such final permits will be obtained 2 months before the commencement of construction works. The Project will undertake a formal consultation meeting with these authorities to confirm the scope and requirements of these permits.	Displacement of Existing Land, Use, Property and People	2 months before the schedule commencement of construction.	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	
149	P, C, O	Permitting - water pollution	In accordance with the provisions of the Water Products Law and the 'Water Pollution Control Regulation', prior written permission and related pasture and permits will be obtained from the relevant authority before the commencement of construction. Such permits will confirm that substances that damage the aquatic environment, aquatic/ecological receptors and other water users will not be released to inland water or to the seaside production sites or areas. This commitment also applies to the use and handling of excavated soil material. Such final permits will be obtained 2 months before the commencement of construction works. The Project will undertake a formal consultation meeting with these authorities to confirm the scope and requirements of these permits.	Geology, Soils and Contaminated Land; Terrestrial Water Environment; Community Health and Safety.	• 2 months before the schedule commencement of construction; • During construction; • During operations.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Environmental Management Plan	Whole Project	
150	P	Permitting - crushing, screening and ready mixed concrete plants.	In accordance with 'Industrial Air Pollution Control Regulation' and the 'Environmental Permit and License Regulation', all required permits and related control measures will be obtained for crushing and screening plants and ready mixed concrete plants. Such permits will be obtained 2 months before the commencement of construction works. The Project will undertake a formal consultation meeting with these authorities to confirm the scope and requirements of these permits. Take additional measures for emissions and additional potential impacts including sources of water are assessed in line with IFC EHS guidelines	Geology, Soils and Contaminated Land; Terrestrial Water Environment; Air emissions; Noise and vibrations; Socio economic; Community Health and Safety.	2 months before the schedule commencement of construction.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure, Change Management Plan	Environmental Management Plan	Whole Project	
151	P	Permitting - water usage	In accordance with Drinking Water Basin Regulations, prior written permission and relevant permits will be obtained from the relevant authorities before the commencement of construction. Such permits will be obtained 2 months before the commencement of construction works. The Project will undertake a formal consultation meeting with these authorities to confirm the scope and requirements of these permits.	Geology, Soils and Contaminated Land; Terrestrial Water Environment; Biodiversity and Conservation.	2 months before the schedule commencement of construction.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure, Change Management Plan	Stakeholder Engagement and Grievance Mechanism Procedure, Environmental Management Plan	Whole Project	

152	C	Damages	In accordance with KGM's technical specifications, in case of any direct or indirect damage on state or personal property as a result of the activities of the Project contractors or sub-contractors, Project Sponsors will ensure that relevant corrective measures (e.g. repair, maintenance, rebuilding, restoration, etc.) are implemented at its own cost in line with the instructions of the KGM or other related governmental agencies.	Displacement of Existing Land, Use, Property and People				Vol III. Ch. 3.2 Vol II. Ch. 12	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Land Acquisition, Compensation & Resettlement Framework, Change Management Plan	Stakeholder Engagement and Grievance Mechanism Procedure, Subcontractor Management Plan	Whole Project	
153	C	Waste and Wastewater	In accordance with Water Products Law No. 1380, wastes generated during the construction and operational phases of the Project (such as excavation waste, solid waste, wastewater and hazardous waste) will not be disposed via surface water. Hazardous wastes will be managed and disposed according to Waste Management Regulation.	Resources and Waste	•During construction; •During operations.	Turkish EIA		Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Control of Substances Hazardous to Health Procedure	Whole Project	
154	C	Critical Cut Area	In areas of critical cuttings, it is recommended to build the slope 1-2m retaining wall. Critical cut area consists of thin bedded sandstones.	Geology, Soils and Contaminated Land	During construction	ESIA		Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Soil erosion, Reinstatement and Landscape Management Plan	KM 125+130 - 126+776	
155	C	Critical Fill Area	In areas of critical fill areas, the fill area is expected to be 29m in height and it is necessary to build a suitable engineered retaining wall.	Geology, Soils and Contaminated Land	During construction	ESIA		Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Soil erosion, Reinstatement and Landscape Management Plan	KM 145+300 - 146+400	
156	C	Critical Fill Area	In areas of critical fill areas, the fill area is expected to be 31m in height and stability analysis requires 3:1 horizontal\vertical slopes is needed to ensure stability. The Project will undertake and implement all required engineering works to comply.	Geology, Soils and Contaminated Land	During construction	ESIA		Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Soil erosion, Reinstatement and Landscape Management Plan	KM 160+080	
157	C	Critical Fill Area	In areas of critical fill areas, the fill area is expected to be 31m in height and stability analysis requires 3:1 horizontal\vertical slopes is needed to ensure stability. The Project will undertake and implement all required engineering works to comply.	Geology, Soils and Contaminated Land	During construction	ESIA		Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Soil erosion, Reinstatement and Landscape Management Plan	KM 173+900	JNCC Statutory nature conservation agency protocol
158	C, O	Biodiversity regulation compliance	In case of identification of relevant protected flora/fauna elements through the Canakkele Province Terrestrial Biodiversity Inventory and Monitoring Project which started in 2014, provisions of Bern, CITES and RAMSAR will be adhered to during construction.	Biodiversity and Conservation	•During construction; •During operations.	Turkish EIA		Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan	Whole Project	
159	C, O	Compliance with the Water Pollution Control Regulation.	In case the Project route passes through any other preservation areas which are being used for drinking and utility water extraction, relevant precautions mentioned in the 'Water Pollution Control Regulation' will be followed.	Resources and Waste; The Terrestrial Water Environment	•During construction; •During operations.	Turkish EIA		Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	
160	P, C	Adherence to the Decisions of the Directorate of Regional Board of Protection of Cultural Property	In case the Project route passes through aqueducts which are defined as protected area by the Directorate of Regional Board of Protection of Cultural Property, implementation will be prepared in accordance with decision of the board and board's opinion will be taken. This is in line with Turkish Law.	Archaeology and Built Heritage	• 2 months before the schedule commencement of construction; •During construction	EIA		Vol III. Ch. 3.5 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Cultural Heritage Management Plan	Whole Project	
161	C, O	Compliance with the 'Regulation on Protection of Wetlands'.	In case the Project route passes through areas which are defined as wetlands: The Application Form for 'Activities Near Wetlands' and the 'Commitment Letter' will be completed in accordance with the Turkish 'Regulation on Protection of Wetlands' and will be submitted to the relevant Municipality at an appropriate date.	Terrestrial Water Environment	•During construction; •During operations.	Turkish EIA		Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, HR & Worker Management Plan, Environmental Management Plan	Whole Project	
162	C	Riparian vegetation impact.	In case the riparian vegetation is riparian gallery forest (medium sensitivity habitat), the vegetation clearance works will only be conducted if habitat compensation measures (with a specific consideration of the Pyrus bulgarica populations identified in this habitat) are applied, in collaboration with local stakeholders.	Biodiversity and Conservation	During construction	ESIA		Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan	KP 110+500, KP 131+000, KP 135+500, KP 141+000, KP 148+000, KP 178+500, KP 196+500 and KP 198+500	

163	C	Security Personnel	In compliance with relevant Turkish legislation on this subject (e.g. Law No. 5188 on Private Security Services) and best practices the Project Sponsors will undertake background review, assessment and training for candidates. Project will provide sufficient training including clear instructions on the objectives and the permissible actions will be provided to the security personnel. The instructions will be based on the relevant Turkish law and will be communicated as terms of employment and reinforced through periodic professional training. Given regular contact with the local populations, training on Grievance Procedures, such as handling of community grievance will also be provided to the security staff as part of their periodic professional training. Violation of the required standards will result in corrective actions, including termination of sub-contracts with security firms.	Community Health and Safety	During construction	ESIA	Vol III. Ch. 3.4 Vol II. Ch. 7	Environmental and Social Management Plan, Employment Policy	Environmental Management Plan, HR & Worker Management Plan, Occupational H&S Plan, Community H&S&Security Management Plan, Environmental Management Plan	Whole Project	
164	C	Avoid the storage of excavated materials into or near freshwater features.	In order to avoid any increases in turbidity levels, the Project will ensure that excavated materials will not be dumped into freshwater features, nor will they be stored in their proximity. All waste will be managed in line with relevant regulations and best practice guidelines.	Biodiversity and Conservation	During construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Environmental Management Plan,	KP 110+500, KP 131+000, KP 135+500, KP 141+000, KP 148+000, KP 178+500, KP 196+500 and KP 198+500	
165	P, C, O	Local Content and Employment	In order to enhance local employment and procurement opportunities, the Project proponent shall develop and agree an Employment policy with primary contractors, while the contractors will develop specific HR& Worker Management Plan. Specific measures of the Plan include the following measures: <ul style="list-style-type: none"> • Conduct a comprehensive demand-and-supply-side analysis to identify and quantify local content potential, identify potential employees, Contractors and suppliers. • Seek to maximise the benefits from the Motorway to local communities in terms of direct and indirect employment, and purchasing of local goods and services during construction. This will include measures such as adopting local employment and purchasing policies, establishing tenders for procurement of subcontracted goods and services at a scale that local businesses can respond to, ensuring opportunities are advertised locally, and providing training for local people to allow them to obtain jobs with the Project as much as possible. • The recruitment processes will be transparent, public and non-discriminatory, providing equal opportunities with respect to ethnicity, religion, language, gender and sexuality. The Contractors will provide information on the recruitment process, with particular emphasis on informing local communities of employment opportunities through different channels such as headmen and local associations. • Outline and require a fair and transparent recruitment process for all openings. • Seek to employ (COK AS and subcontractors) local personnel residing in project-affected communities . • Provide advance information on tendering opportunities to local businesses through trade and industry chambers and local business organizations in the region. • Break tendering opportunities into smaller components to increase the likelihood of granting individual pieces of work to Turkish companies. • In order to enhance Project impacts on long-term employment and procurement during operations, the Project proponent will implement the Local Content and Employment Strategy and Plan, which will outline and require a fair and transparent recruitment process for all openings. • COK A.S. will also seek to promote local employment (including job training) and purchase local goods and services during the operation of the Motorway to the extent possible. Measures will include the facilitation of access to alternative employment for people affected by the loss of jobs through the Project. • Supply-chain opportunities for local people/businesses will be facilitated through the CLOs as part of the LACRP implementation. • Increase capacity enhancement benefits through training programs for contractors and subcontractors on Project HSE policies, as well as phased capacity building and targeted training programs for national and local suppliers agreed with local government and industry organizations. 	Socio economic;Labour & working conditions, Displacement of Displacement of Existing Land, Use, Property and People	<ul style="list-style-type: none"> • 2 months before the schedule commencement of construction; •During construction. •During Operation 	ESIA	Vol III. Ch. 3.1 Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Employment Policy	Stakeholder Engagement and Grievance Mechanism Procedure, HR & Worker Management Plan, Supply Chain Management Plan	Whole Project	
166	P, C, O	Waste Management	In terms of littering, the Environmental Management Plan during Motorway operations will include the following aspects: <ul style="list-style-type: none"> • motorists will be advised via signposts on the approaches and on the Bridge to not litter; • litter and debris on the Bridge road surface and walkways will be cleaned regularly as part of routine maintenance procedures and appropriately disposed of; • road-side litter and debris that has blown into the environment surrounding the bridge will be regularly collected; and • litter receptacles will be provided at vista-points/parking areas and regularly emptied and all litter will be disposed of at appropriate facilities. 	Biodiversity and Conservation	<ul style="list-style-type: none"> • 2 months before the schedule commencement of construction; •During construction; •During operations. 	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Environmental Management Plan, Transport Control & Site Access Procedure	Bridge.	

167	C	Change of habitat.	In the event that a new disposal site of dredge spoils is selected, a full environmental and social review of the new site will be undertaken and relevant mitigation measures prepared. All information will be submitted to the Lenders for review and approval and then all regulatory permits, approvals and consents obtained.	Biodiversity and Conservation	During construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Environmental Management Plan	Dredge spoild diposal site	
168	C	General Construction	Infirmaries, medical facilities and Wastewater Treatment Plants will be available at all construction sites and compounds. These facilities will be subject to quarterly inspections to monitor their effectiveness and to maintain them in working order.	Displacement of Existing Land, Use, Property and People; Socio economic	During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, HR & Worker Management Plan, Occupational Health & Safety Plan	Whole Project	
169	C	Control vibrations at quarry sites.	Instead of using secondary blast, hydraulic hammers or other mechanical methods will be preferred to improve rock fragmentation and minimize fly-rock risks. Hammers will be shielded by noise screens in order to avoid significant increase in noise impacts on villages situated in the vicinity.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Marine Safety for Tower Foundation Procedure	Near settlements	
170	C	Noise reduction from construction transportation.	Internal haul routes will be kept well maintained and steep gradients will be avoided wherever possible.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Biodiversity Action Plan	Whole Project	
171	C	Following the international best practice regarding wetlands and watercourses	International best practice will be followed when on working at sensitive wetlands and watercourses.	Terrestrial Water Environment	During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Environmental Management Plan	Whole Project	
172	P, C, O	Community Health and Safety	It should be noted that assessment and mitigation presented in the ESIA is based on a high-level overview of the likely community HS risks and identification of overarching mitigation. A more formal community health and safety risk assessment, inclusive of consultation with relevant third party (e.g. community) stakeholders will be used to further define community HS risks and related impacts. These will be reviewed and revised to capture any additional mitigation that may be required based on the findings of that risk assessment process.	Community Health and Safety	•During construction; •During operations.	ESIA	Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Environmental Management Plan, Community H&S&Security Management Plan	Whole Project	
173	C, O	Labour	Labour Law and Worker Health and Work Safety rules will be adhered to throughout construction and operations phases in order to prevent occupational work accidents. All necessary measures will be taken to ensure compliance. All workers will be adequately informed of the scope of the legislation and rights.	Community Health and Safety; Labour and Working Conditions.	•During construction; •During operations.	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Employment Policy	Stakeholder Engagement and Grievance Mechanism Procedure, HR & Worker Management Plan, Occupational Health & Safety Plan	Whole Project	
174	P	Landscape design.	Landscape design will be coherent with regional landscape identity to the extent possible.	Landscape and Visual	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 2.7 Vol II. Ch. 7	Environmental and Social Management Plan	Soil erosion, Reinstatement and Landscape Management Plan , Environmental Management Plan	Whole Project	
175	P	Local access	Legitimate requests of local people regarding the avoidance and/or minimization of the restriction of access between their settlement areas and agricultural lands will be considered by the Project Sponsors' design team and feasible solutions will be developed and implemented, where possible	Displacement of Existing Land, Use, Property and People	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 3.2 Vol II. Ch. 17	Change Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	
176	C	Emergencies	Local emergency services will be alerted in event of emergency that risks collateral damage to the local communities. As part of the community engagement process, details regarding the nature of emergencies and their response plans (e.g. Emergency Prevention and Response Plan) will be shared with the local communities. Channels of communication will be established and agreed upon, and in event of emergency, the communities will be alerted and informed by appropriate means including telephone, audible alarms and vehicle mounted speakers, for example. Emergency preparedness and response plans and procedures are required to be developed by the contractors and subcontractors of COK A.S. and they should be in line with the COK A.S. EPR Policy. These procedures will ensure that an Emergency Respond Team (ERT) and an Emergency Response Centre (ERC) are established. ERT and ERCs will be activated immediately when Category 1, 2 and 3 types of incidents occur.	Community Health and Safety	During construction	ESIA	Vol III. Ch. 3.4 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Emergency Response Plan, Stakeholder Engagement and Grievance Mechanism Procedure, Environmental Management Plan, Community H&S&Security Management Plan	Whole Project	
177	P	Forest lands	Loss of forest lands will be minimized by taking relevant design measures (i.e. construction of viaducts).	Displacement of Existing Land, Use, Property and People	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 3.2 Vol II. Ch. 27	Environmental and Social Management Plan, Change Management Plan, Land Acquisition, Compensation & Resettlement Framework	Biodiversity Action Plan, Environmental Management Plan	Whole Project	

178	P	Preparation of LACRF & CLAP	<p>Main Mitigation will be preparation of the LACRF and a Community-Level Assistance programme (CLAP) where the expropriation process and compensation approach will be described in detail. Borders of the construction areas and expropriation corridor will be identified by suitable markings.</p> <ul style="list-style-type: none"> • Construction crew will be trained to stay within the border of the construction areas and expropriation corridor. • For exceptional cases when the privately-owned land has to be used but the expropriation or court processes have not been finalized yet, no work will be started until bilateral agreements are settled and official consent letters are taken from the legal owners. In such cases, official commitment letters will be provided to legal owners by the Project Sponsors regarding the scope of works and compensation of probable damages and the works will be conducted in accordance with those consent and commitment letters. • If complaints related with unauthorized use of privately-owned lands, damages on adjacent lands, etc. are received through Project's Grievance and Comment Mechanism, evaluation/inquiry will be conducted on a case-by-case and where necessary, corrective actions will be planned and implemented. • In accordance with KGM's technical specifications, in case of any direct or indirect damage on state or personal property as a result of the activities of the Project contractors or sub-contractors, Project Sponsors will ensure that relevant corrective measures (e.g. repair, maintenance, rebuilding, restoration, etc.) are implemented at its own cost in line with the instructions of the KGM or other related governmental agencies. • Engagement will be maintained by COK A.S. with Affected Communities, including host communities, through the process of stakeholder engagement and the CLOs; • When displacement cannot be avoided, displaced persons will be provided with appropriate compensation for loss of assets per the Expropriation Law. The details of the compensation approach by KGM are provided in the LACR Framework. 	Displacement of Existing Land, Use, Property and People	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 3.2 Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Land Acquisition, Compensation & Resettlement Framework	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	
179	P, C	Waste Management Procedure	<p>Measures will be applied for all wastes generated during construction according to the Waste Management Procedure to be developed:</p> <ul style="list-style-type: none"> • Training on safe management of all types of waste to be provided to construction staff to prevent any harm on staff, the environment and the public; • Storage of wastes according to international best practices (e.g. IFC EHS General Guideline). Apply additional measures for storage of hazardous wastes (such as use of secondary containment, access restriction, provision of PPE etc.) as necessary to prevent harm to construction staff, environment and the public; • Use of designated waste collection containers and storage areas for different kinds of wastes (hazardous and non-hazardous); • Adequate labelling on waste collection containers and storage areas for different kinds of wastes (hazardous and non-hazardous); • Re-use of excavated soils in the Project area as far as possible and seek alternative uses of surplus spoil where practicable (eg landscaping and earth works for other projects) to minimise the requirements for off-site disposal; • Transport of waste in licensed vehicles designed appropriately to the type of waste to minimise the risk of release of materials (hazardous and non-hazardous materials) and windblown debris. Provide training to drivers on handling and disposal of their cargo and the documentation of the transport describing the nature of the waste and its degree of hazard; and • Dispose wastes at licenced waste facilities; prior to facility selection, a due diligence review shall be performed to assess whether the facilities are materially in compliance with laws and regulations. If the sites do not fulfil the main requirements, COK A.S. will seek for alternative solutions. 	Resources and Waste	<ul style="list-style-type: none"> • 2 months before the schedule commencement of construction; • During construction. 	ESIA	Vol III. Ch. 2.1 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, including Waste Management Plan	Whole Project	
180	C	Waste and Wastewater	Measures will be taken to ensure that dredge spoils are treated (as necessary) and disposed of in accordance with Turkish regulations and, if required, EU legislation and specific Lender Requirements.	Resources and Waste	During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Marine Safety for Tower Foundation Procedure	Whole Project	
181	C	Control vibrations at quarry sites.	Mechanical ripping will be preferably used to avoid or minimize the use of explosives. Blasting will be limited to dedicated blasting times which will be negotiated with the affected communities in order to protect the people and minimize nuisance. Specific blasting plans and charging procedures will be developed.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Near settlements	

182	C	Waste Management Procedure	<p>Mitigation measures to ensure appropriate handling of non-hazardous and hazardous wastes generated during the operation of the Project will be set out in the Waste Management Procedure as part of the Environmental Operation Management Plan (see ESMP). The procedures will take into account the Turkish regulations and IFC General EHS Guidelines (IFC, 2007) requirements. These measures will include inter alia the following:</p> <ul style="list-style-type: none"> • Develop a plan available to all staff at service areas, toll booths etc. which shows where different types of wastes can be placed; • Regular inspections of sites to ensure waste facilities are correctly used and are kept clean and tidy; • Maintain full records of the type, quantity, composition, origin, disposal destination and method of transport for all wastes. Collect solid wastes on a regular basis and dispose them appropriately at a designated disposal site; • Provide training on proper collection and disposal of solid wastes to staff; • Use solid waste containers that will not be affected by weather conditions and which will adequately and safely contain the wastes; • Waste containers shall have labels which describe the waste type. Proper labelling may prevent mixing of hazardous waste and non-hazardous solid wastes; • Reuse/recycling methods shall be considered to minimise solid waste generation; • Use certified/licensed facilities for final disposal of solid wastes, which cannot be reused/recycled; • Prevention of disposal of solid waste outside the designated sites and into any surface water or groundwater source, or any other location that could potentially affect the environment and human settlements; • Use of signage and other postings to advise motorists not to litter; • Collect road litter or illegally dumped waste along the Project route and dispose them appropriately; • Provide recycling and trash bins at parking lots and rest areas to minimise road litters; • Maintain and manage supply inventories to minimise the disposal of unused products; • Manage and appropriately dispose sediments and sludge removed from storm drainage systems; • Manage old road surface materials by reusing them in paving, or stockpiling the materials for road bed or other uses; • Hazardous wastes to be disposed of by licensed waste contractors; and <p>The future Operation Contractor of the Project will be responsible for ensuring that all wastes</p>	Resources and Waste	<ul style="list-style-type: none"> • 2 months before the schedule commencement of construction; • During construction; • During operations. 	ESIA	Vol III. Ch. 2.1 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, including Waste Management Plan	Whole Project	
183	P	Terrestrial Environmental Design Management Plan (TEDMP)	<p>Mitigation procedures will be included within the Terrestrial Environmental Design Management Plan (TEDMP) and other plans (especially the EPR Plan) related to the design phase of the Project.</p> <ul style="list-style-type: none"> • Appropriate treatment-spill control systems must be placed in water crossings, fresh water sources and protected areas where surface runoff may adversely affect soil, surface water and ground water media. • Underground storage tanks (USTs) or aboveground storage tanks (ASTs) will be designed and built according to the recognized industrial standards. Containment measures for gas/petrol stations will be in compliant to the Turkish Standard TSE 12820 for gas/petrol stations and the IFC EHS guideline for retail petroleum networks. Secondary containment systems will be used for USTs and ASTs to prevent the uncontrolled release of fuels. • Corrosion protection will be used in underground steel tanks and piping, which may consist of coating with a suitable dielectric material or by cathodic protection. • Leak detection systems will be provided to detect the presence of liquid or petroleum vapor within the interstitial space of double-walled tanks. • Spill and overflow alarm, automatic shut-off devices and/or catch basin around fill pipes will be equipped for the tanks. Fill pipes on ASTs will be located within the tank's secondary containment structures. • Petroleum contaminated storm water runoff from petrol stations will be minimized by: <ul style="list-style-type: none"> o Installation of roofs or covers to prevent rainwater influence and runoff at areas handling petroleum products; o Implementation of secondary containment system; and o Segregation of clean drainage and potentially contaminated drainage, treating the latter through oil/water separator. • The design of rest areas/restaurants/petrol stations along the Motorway must include appropriate treatment of liquid and solid wastes to avoid contamination of local soils/ecology 	Geology, Soils and Contaminated Land	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Emergency Response Plan, Environmental Management Plan	Whole Project	
184	C	Restrictions.	Night-time operation and transportation will be minimized where villages are located close by and/or a transportation route passes through.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Transport Control and Site access Procedure	Near settlements	
185	C	Alien species management	No planting of alien species will occur in the camps or any areas within the Aol, including landscaping of re-vegetated areas.	Biodiversity and Conservation	During construction.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, HR & Worker Management Plan	Whole Project, where is the case.	

186	C	No simultaneous piling.	No simultaneous piling will be conducted.	Biodiversity and Conservation	During construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan	Bridge.	
187	C	Use of Hydrohammer technology.	Noise abatement technologies applicable specifically to the Hydrohammer technology will be included if technically feasible and necessary. If results are above standards (NOAA or German, to be decided), Project will implement the use of a noise reduction device or change in methodology	Biodiversity and Conservation	During construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan	Bridge	
188	C	Restrictions.	Noise levels from longer term construction activities (longer than 10 days) will be restricted to 55 dB LAeq during the evening, and 50 dB LAeq at night as far as is practicable, or to other standards that have been agreed with the local authority.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Near settlements	
189	O	Non-native or ornamental planting.	Non-native species will be used in locations where their presence is of local relevance. For example, in an urban area, non-native or ornamental species will be used to match non-native or ornamental planting in that urban area.	Landscape and Visual	During operations	ESIA	Vol III. Ch. 2.7 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Soil erosion, Reinstatement and Landscape Management Plan , Environmental Management Plan	Whole Project	
190	O	Planting.	Planting mixes will be selected using native species and planting will be set out to establish new and enhance existing native habitats. The use of native species throughout the area is important so that the Motorway planting will, over time, become almost indistinguishable from the vegetation naturally occurring in the surrounding area.	Landscape and Visual	During construction	ESIA	Vol III. Ch. 2.7 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Soil erosion, Reinstatement and Landscape Management Plan , Environmental Management Plan	Whole Project	
191	O	Planting.	Planting treatments will be designed to visually screen road structures and earthworks from nearby housings and settlements.	Landscape and Visual	During operations	ESIA	Vol III. Ch. 2.7 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Soil erosion, Reinstatement and Landscape Management Plan , Environmental Management Plan	Whole Project	
192	O	Planting.	Planting treatments will be interrupted to open up key views and vistas which reinforce local identity and minimize driver monotony.	Landscape and Visual	During operations	ESIA	Vol III. Ch. 2.7 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Soil erosion, Reinstatement and Landscape Management Plan , Environmental Management Plan	Whole Project	
193	O	Planting	Planting will be implemented to reconnect hedgerows or areas of planting formerly severed as a result of the construction works in order to maintain wildlife corridors and reinstate local landscape character.	Landscape and Visual	During construction	ESIA	Vol III. Ch. 2.7 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Soil erosion, Reinstatement and Landscape Management Plan , Environmental Management Plan	Whole Project	
194	O	Planting.	Planting will be implemented to restore or compensate for lost habitats and visual landscape character.	Landscape and Visual	During operations	ESIA	Vol III. Ch. 2.7 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Soil erosion, Reinstatement and Landscape Management Plan , Environmental Management Plan	Whole Project	
195	C	Using of portable screens if necessary.	Portable screens will be used where necessary to reduce the negative effects from construction noise for receptors. For sensitive receptors (e.g. hospitals, nursing homes, schools and other education facilities), the Project will undertake direct prior consultation with the receptor to consider specific and additional mitigation measures.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Stakeholder Engagement and Grievance Mechanism Procedure, Biodiversity Action Plan, Environmental Management Plan	Near settlements	

196	P	Permitting - any construction or excavation material storage sites.	<p>Prior and written permission will be obtained from the State Hydraulic Works and related local institutions before any construction or excavation material storage sites are selected and construction work commences.</p> <p>The Project will obtain all prior written permissions 2 months before the scheduled commencement of construction work (including site preparation and early works).</p> <p>The Project will undertake a formal consultation meeting with these authorities to confirm the scope and requirements of this approval.</p> <p>Identify the location of these sites by the authorities and ensure that IFC EHS Guidelines for Construction Materials Extraction be followed.</p>	Geology, Soils and Contaminated Land; Terrestrial Water Environment; Air emissions; Noise and vibrations; Archaeological and Built Heritage.	2 months before the schedule commencement of construction.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure, Change Management Plan	Watercourse Crossing Plan	Whole Project	
197	C, O	Socio-Economic	<p>Prior approval from State Hydraulic Works Region 25 will be obtained in relation to situations where the Project passes through irrigation areas and/or water transmission lines which are under control of State Hydraulic Works Region 25. The Project will identify such occurrences and undertake consultation to reach agreement with the State Hydraulic Works Region 25.</p>	Socio Economics; Displacement of Existing Land, Use, Property and People	<ul style="list-style-type: none"> •During construction; •During operations. 	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Change Management Plan	Stakeholder Engagement and Grievance Mechanism Procedure, Watercourse Crossing Plan	Whole Project	
198	C	Community Relations Management Plan	<p>Prior to commencement of operations, the Community Relations Management Plan will be updated and implemented on the topic of potential impacts from communicable diseases and other impacts of the Motorway operations (similar to the above-described aspects during construction).</p>	Community Health and Safety	During construction	ESIA	Vol III. Ch. 3.4 Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, , Environmental Management Plan, Community H&S&Security Management Plan	Whole Project	
199	P, C	Licenses	<p>Prior written permission and related permits and control measures will be obtained from the relevant authority regarding any blasting work before the commencement of construction.</p> <p>All such works will only be undertaken by qualified and licenced personnel after all the permits have been obtained.</p> <p>Such permits will be obtained 2 months before the commencement of construction works.</p> <p>The Project will undertake a formal consultation meeting with these authorities to confirm the scope and requirements of these permits (including the preparation of all H&S management procedures, public notification and blast monitoring measures).</p>	Labour and Working Conditions; Displacement of Existing Land, Use, Property and People;	<ul style="list-style-type: none"> • 2 months before the schedule commencement of construction; •During construction. 	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Occupational Health & Safety Plan	Whole Project	
200	C, O	Waste and Wastewater	<p>Procedures for handling and storage of hazardous materials will be in accordance with manufacturer's instructions and waste management regulations. Fuels, oils and hazardous materials to be stored on a suitably sized impervious and bunded base. Hazardous wastes to be disposed of by licensed waste contractors.</p>	Resources and Waste	<ul style="list-style-type: none"> •During construction; •During operations. 	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Control of Substances Hazardous to Health Procedure, Transport Control and Site access Procedure	Whole Project	
201	P, C	Climate resilience	<p>Project design will ensure that Motorway is designed so that:</p> <ul style="list-style-type: none"> • Asphalt/road surfacing must be suitable for hot & dry climate; • Design of embankments and other sloped areas (and the vegetative cover) will need to account for increased risk of soil erosion due to heavy (though infrequent) rain events; • Design of the Motorway drainage system will need to be suitable for the potentially more intense (though infrequent) rainfalls 	Air and Climatic Factors	<ul style="list-style-type: none"> • 2 months before the schedule commencement of construction; •During construction 	ESIA	Vol III. Ch. 2.5 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	
202	P, C, O	Stakeholder Engagement Plan (SEP)	<p>Project planners will meet with the TANAP representatives to confirm details of the Pipeline routing and construction time-line to minimise logistical interference, minimise common areas of land disturbance and harmonise re-instatement/revegetation measures. As part of this, Project planners will review TANAP environmental assessment documentation and discuss with TANAP to align findings and mitigation actions as related to cumulative impact contributions from the Project.</p>	Cumulative Impacts	P/C/O	ESIA	Vol II. Ch. 8	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Land Acquisition, Compensation & Resettlement Framework	Stakeholder Engagement and Grievance Mechanism Procedure, Soil erosion, Reinstatement and Landscape Management	Close to TANAP pipeline crossings	

203	C	Fires	Project Sponsors will require all contractor and sub-contractor personnel to take necessary measures to avoid forest fires and immediately respond to any fire event that could not be avoided by measures taken, including - <ul style="list-style-type: none"> o Project personnel will be trained to immediately inform forestry authorities about the location and scale of any fire incident. o Fire fighting equipment will be provided at construction sites (as relevant for different types of fires), inspected regularly and staff trained to use the equipment.. o Proper fire extinguishers will be kept ready at site where hot/welding works will be performed. o Smoking will only be permitted in designated, safe areas. o Staff will be trained on fire protection awareness and response. 	Displacement of Existing Land, Use, Property and People			Vol III. Ch. 3.2 Vol II. Ch. 30	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Biodiversity Action Plan, Emergency Response Plan, Biodiversity Action Plan, Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	
204	C	Noise reduction from construction transportation.	Project traffic routing through community areas will be avoided wherever possible. Where this cannot be avoided, Project will enforce slow driving rules in villages, particularly near sensitive use areas which will be identified (at least one month) prior to start of construction related activities. Any transgressions will be notified to site management and dealt with accordingly (such as additional driver training, temporary speed-restrictions, enhanced driving monitoring).	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Biodiversity Action Plan	Near settlements	
205	C	Shipping-related accidents and accidental spillages	Project will inform the port authorities of the overall planned construction schedule. Prior to start of construction, Project will identify the restricted access zones around the construction vessels, tower structures and southern anchorage, and clarify enforcement of these zones by the port authorities.	Biodiversity and Conservation; Marine Physical	During construction.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Stakeholder Engagement and Grievance Mechanism Procedure	Bridge.	
206	C	Run-off and wastewater drainage mechanisms to prevent the release of large volumes of untreated run-off into Dardanelles Strait.	Project will adopt and implement an Environmental and Social Management Plan – ESMP - and its subsequent plans and procedures with provisions for construction site run-off and wastewater drainage mechanisms to prevent the release of large volumes of untreated run-off into Dardanelles Strait. Where significant site drainage is expected, the drainage will pass through a sediment trap and/or an oil/water separator before being discharged.	Marine Physical	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Dardanelles Strait.	
207	C, O		Project will adopt road traffic management measures, including an effective spill containment and clean-up plan, as per the Environmental and Social Management Plan (ESMP) and its subsequent plans and procedures (e.g. environmental Management plan including Waste and Wastewater and a Marine Safety for Tower Foundation including Dredged Material) which will be prepared for the construction stage, and then prepared later to apply to Motorway and Bridge operations by O&M Contractor.	Marine Physical	•During construction; •During operations.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Transport Control & Site Access Procedure	Bridge.	
208	C	Community relations and security	Project will communicate security arrangements to the workers and the affected communities, and will involve workers and communities in the discussions on security arrangements. COK A.S. will establish a Community Relations Management Plan to set out the security measures, particularly for the Construction Stage of the Project.	Community Health and Safety	During construction	ESIA	Vol III. Ch. 3.4 Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Environmental Management Plan, Occupational H&S Plan, Community H&S&Security Management Plan	Whole Project	

209	P	Land Acquisition, Compensation and Resettlement Framework (LACRF) & Community-Level Assistance Programme (CLAP)	<p>Project will development a Land Acquisition, Compensation and Resettlement Framework (LACRF), including the CLAP. Project will establish procedures to monitor and evaluate its implementation and introducing corrective action as necessary. The LACRF will describe the expropriation process and compensation approach by KGM in line with Turkish regulations. The CLAP will include additional measures by COK A.S. in the affected communities – as selected in a Community Needs Assessment and based on the ESIA results - to support affected landowners/users and other community residents to supplement the KGM measures.</p> <p>Close collaboration will be maintained throughout the process with the KGM as the responsible government agency.</p> <p>Where involuntary resettlement is unavoidable the expropriation will be carried out by KGM per the Turkish regulations to identify the persons who will be displaced by the Project and determine who will be eligible for compensation and assistance. Persons eligible for compensation are those who own the land (or part-owners) including persons (i) who have formal legal rights to the land or assets they occupy or use, and (ii) who do not have formal legal rights to land or assets, but have a claim to land that is recognized or recognizable under national law.</p> <p>If people living in the project area are required to move to another location, displaced persons will be offered cash compensation in accordance with standard KGM policy and in line with the Turkish Expropriation Law.</p> <p>Additional community-level support will be available for the affected communities through supplemental support measures by COK A.S. as compiled in a Community-Level Assistance Programme (CLAP)</p>	Displacement of Existing Land, Use, Property and People			Vol III. Ch. 3.2 Vol II. Ch. 19	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Land Acquisition, Compensation & Resettlement Framework	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	
210	C	The control and mitigation of construction dust.	Project will enforce a speed limit of 30kph on unpaved surfaces. Transgressions of this limit will be reported to site management and dealt with accordingly.	Air and Climatic Factors	During construction	ESIA	Vol III. Ch. 2.5 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Transport Control & Site Access Procedure	Whole Project	
211	C	Mitigation measures for impacts on utility supply during construction.	Project will engage with local authorities and utilities companies to ensure continuity of supply to communities. Only short term 'planned' disruption to drinking water or electricity services will be allowed. Disruption will not exceed a 12 hours period.	Socio economic	During construction	ESIA	Vol III. Ch. 3.1 Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Environmental Management Plan, Supply Chain Management Plan	Whole Project	
212	C	Maintenance.	Project will ensure that all machinery and vehicles are regularly inspected and maintained.	Noise and Vibration	During construction	EIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Transport Control & Site Access Procedure	Whole Project	
213	C	Noise reduction from construction transportation.	Project will ensure that empty trucks have no loose chains or other noise-generating parts on the loading platform.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	
214	C	The control and mitigation of construction dust.	Project will ensure that exposed ground and earthworks areas are covered as much as possible, for example with sheeting or boarding or the use of chemical binders should be investigated.	Air and Climatic Factors	During construction	ESIA	Vol III. Ch. 2.5 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	
215	C	Restrictions.	Project will ensure that machines in intermittent use will be shut down in the intervening periods between work (or throttle them down to a minimum).	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Near settlements	
216	C	Minimizing drop height of materials.	Project will ensure that materials are dropped from a height low enough to avoid any significant acoustic disturbances (as defined in the ES) of surrounding receptors, or to generally minimise noise from the site.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	
217	C	Contaminated land	<p>Project will ensure that the following measures will be taken to appropriately handle contaminated land:</p> <ul style="list-style-type: none"> • Report to the responsible local authorities; • Conduct further measures as agreed with the authorities and local enterprises; • Assess whether lightly contaminated material could remain in place; • Appropriate removal/storage, treatment and disposal practices of contaminated soils; and • Provide training to construction staff on how to recognize and appropriately handle contaminated land when encountered during construction activities. <p>In case the excavated soil is re-used, such as for landscaping purpose, the Soil, Reinstatement and Landscape Management Plan to be developed will be applied and also presented in the ESMP.</p>	Resources and Waste	During construction	ESIA	Vol III. Ch. 2.1 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan Soil, Reinstatement and Landscape Management Plan	Whole Project	
218	C	The control and mitigation of construction dust.	Project will ensure that wind breaks are erected around the key construction activities and, if possible, in the vicinity of potentially dusty works, to minimise impacts at nearby residential receptors.	Air and Climatic Factors	During construction	ESIA	Vol III. Ch. 2.5 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	

219	C	The control and mitigation of construction dust.	Project will ensure that work vehicles are kept sufficiently clean to avoid tracking dirt around and off the site.	Air and Climatic Factors	During construction	ESIA	Vol III. Ch. 2.5 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Transport Control & Site Access Procedure	Whole Project	
220	C	The control and mitigation of construction dust.	Project will ensure that work vehicles transporting friable materials are kept adequately covered to prevent materials being spread around and off the site. Transgressions will be reported to site authority and dealt with accordingly.	Air and Climatic Factors	During construction	ESIA	Vol III. Ch. 2.5 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Transport Control & Site Access Procedure	Whole Project	
221	C	The control and mitigation of construction dust.	Project will ensure that, where feasible, surface binding agents are used on exposed open earthworks.	Air and Climatic Factors	During construction	ESIA	Vol III. Ch. 2.5 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	
222	C	Speed limits for trucks.	Project will implement 30kph speed limits for trucks while travelling to and from construction sites (within settlements and on village roads of poor condition). This was reduce noise and vibrations but will also limit generation and emission of dust in non-paved accessed roads and limit the risk of accidents with fauna. Transgressions of this limit will be reported to site management and dealt with accordingly.	Noise and Vibration; Biodiversity and Conversation, Community H&S, Air and Climatic Factors	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Transport Control & Site Access Procedure	Near settlements	
223	O	Noise barriers adjacent to the Motorway.	Project will install noise barriers along the side of the motorway where passing close to noise sensitive receptors at which noise impacts, as defined in the ES, cannot be avoided. The Project will engage with the occupants of noise-sensitive receptors in advance to discuss potential issues and concerns.	Noise and Vibration	During operations	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Near settlements	IFC PS1 PS3; IFC EHS General Guidelines
224	C	Installation of silencers or acoustic enclosure on machinery.	Project will install silencers or acoustic enclosure on machinery, where applicable, such as installation of suitable mufflers on engine exhausts and compressor components as well as the use of portable sound barriers around stationary equipment e.g. generators.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Temporary construction sites	IFC General EHS Guidelines
225	C	Limiting hours of operation.	Project will limit operating hours (typically to core daytime working hours, or times when areas are less sensitive to noise) for specific equipment or operations with larger noise and vibration impacts (e.g. trucks or machines operating in or passing through community areas).	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Near settlements	IFC General EHS Guidelines
226	P, C	Emergency Prevention and Response Plan	Project will prepare, during the current design stage, an Emergency Response Plan (EPR Plan) applicable to spill containment and clean-up incidents on land and in the marine environment. The EPR Plan will apply to marine incidents stemming from construction vessels, eg. spillage of oils or fuels into the Strait waters due to leaks or collision damage. The EPR Plan will include, among others, the following topics. <ul style="list-style-type: none"> • A spillage risk assessment in accordance with the UK Design Manual for Roads and Bridges (DMRB). • Based on the results of the risk assessment (and in conformance with statutory requirements), design of spill prevention/containment structures around sensitive equipment, installation of appropriate spill cleanup equipment and development of response procedures. • Training of contractor staff on spill prevention and response. • Emergency communication procedures with local authorities. 	Biodiversity and Conservation	• 2 months before the schedule commencement of construction; • During construction.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Environmental Management Plan, Emergency Response Plan, Marine Safety for Tower Foundation Procedure	Dardanelles Strait.	IFC General EHS Guidelines
227	C, O	Occupational Health and Safety	Project will provide H&S trainings for all personnel in accordance with the Turkish 'Regulation on Health and Safety'.	Community Health and Safety	• During construction; • During operations.	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Employment Policy	Stakeholder Engagement and Grievance Mechanism Procedure, HR & Worker Management Plan, Occupational Health & Safety Plan	Whole Project	IFC General EHS Guidelines; IFC EHS Guidelines for Retail Petroleum Networks; TS 12820: 2006 Petrol filling stations - Safety requirements
228	C	Restrictions.	Project will restrict the noise to be perceived at nearby settlements from construction to 70 dB Leq during the evening and 65 dB Leq at night as far as practicable for short term activities lasting not more than 10 days.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Near settlements	IFC General EHS Guidelines; KGM's Technical specifications (2006)
229	O	Low noise road surfacing and speed limits.	Project will use low noise road surfacing in the form of SMA (Stone Mastic Asphalt which is also referred to as Stone Matrix Asphalt) and speed reductions when close to noise sensitive receptors and where significant noise impacts are predicted during detailed design. Project will ensure that the road surface is maintained in good condition in order to minimise vibration. COK A.S. will have a maintenance program in line with KGM requirements for the maintenance of the road surface to preserve surface characteristics. The program characteristics can be obtained from COK A.S..	Noise and Vibration, Community Health and safety	During operations	Turkish EIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	IFC General EHS Guidelines

230	C	Land Acquisition	Property rights of the General Directorate of TEIAS will be protected in accordance with relevant laws and regulations of Turkey in relation to Highway Expropriation Activities. The Project will consult with TEIAS prior to the finalisation of expropriation requirements and related activities. Where there are proposed changes in Project design with land expropriation implications for TEIAS, the Project will re-engage with TEIAS.	Socio Economics; Displacement of Existing Land, Use, Property and People	During construction	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Land Acquisition, Compensation & Resettlement Framework, Change Management Plan	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	IFC General EHS Guidelines
231	C	Emergencies	Proposals for preparation of full EPR Plans for protection of community health and safety are set out in the ESMP (Volume IV) to comply with the provisions of IFC PS4 / EBRD PR4, including plans to prevent, prepare for and respond to emergencies affecting road users and the wider community in particular on the Çanakkale Bridge. These will be prepared in consultation with the local emergency services and necessary information will be conveyed to road users and the wider community.	Community Health and Safety	During construction	ESIA	Vol III. Ch. 3.4 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Emergency Response Plan, Stakeholder Engagement and Grievance Mechanism Procedure, Environmental Management Plan	Whole Project	IFC General EHS Guidelines
232	C	Land Acquisition	Proprietorship data of all real estates located on the Project route will be determined and expropriation activities of the Project will not be initialized before taking consent of land owners.	Socio Economics; Displacement of Existing Land, Use, Property and People	During construction	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Land Acquisition, Compensation & Resettlement Framework	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	IFC General EHS Guidelines; Hazardous Materials Management Procedure
233	C	Surface Water Bodies and Water Infrastructure (Channels)	Protection measures to prevent soil erosion after the finalisation of the earth work will be implemented where required such as: - use of grass turf to cover the soil surface; - use of erosion-control blankets or mats; - renaturation as soon as feasible.	Terrestrial Water Environment	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	HR & Worker Management Plan, Soil erosion, Reinstatement and Landscape Management Plan	Whole Project	IFC General EHS Guidelines
234		Measures to mitigate local economic inflation and income inequalities include:	Provide separate food and services and additional social facilities for construction workers to avoid rising prices with subsequent economic inflation in the local economy along the route. The supply of goods and services will be based to the extent possible on local enterprises.	Socio economic	• 2 months before the schedule commencement of construction; • During construction	ESIA	Vol III. Ch. 3.1 Vol II. Ch. 7	Environmental and Social Management Plan	HR & Worker Management Plan, Supply Chain Management Plan	Whole Project	IFC General EHS Guidelines
235	C, O	Community Health and Safety	Provisions and requirements of the Water Products Law and the 'Regulation on Water Products' will be complied with.	Community Health and Safety; Labour and Working Conditions.	• During construction; • During operations.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Environmental Management Plan, Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	IFC General EHS Guidelines
236	C	Land Acquisition	Provisions and requirements of the Zoning Law will be complied with. The Project will undertake consultation with the relevant authorities on this matter prior to the finalisation of the Project design.	Displacement of Existing Land, Use, Property and People	During construction	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	IFC General EHS Guidelines
237	C, O	General Construction	Provisions of the 'Disaster Regulation on Engineering Structures Along Highways' will be complied with. The Project will undertake consultation with the relevant authority before the design is finalised and request the input of the regulators who are responsible for the Disaster Regulation on Engineering Structures Along Highways	Displacement of Existing Land, Use, Property and People; Socio economic	• 2 months before the schedule commencement of construction; • During operations.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Emergency Response Plan	Whole Project	IFC General EHS Guidelines
238	C, O	Waste and Wastewater	Provisions of the 'Regulation on Control of Waste Batteries and Accumulators' will be complied with regarding waste batteries and accumulators.	Resources and Waste	• During construction; • During operations.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Transport Control and Site access Procedure	Whole Project	IFC General EHS Guidelines
239	C, O	Socio-Economic	Provisions of the 'Regulation on Protection and Usage of Agricultural Lands, Pasture Law and Law on Soil Protection and Land Usage' will be complied with.	Socio Economics; Displacement of Existing Land, Use, Property and People	• During construction; • During operations.	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, HR & Worker Management Plan	Whole Project	IFC General EHS Guidelines
240	C	General Construction	Provisions of the 'Regulation on Spatial Plans' will be followed during construction.	Community Health and Safety; Labour and Working Conditions.	During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	HR & Worker Management Plan	Whole Project	IFC General EHS Guidelines
241	C, O	Waste and Wastewater	Provisions of the 'Regulation on Transportation of hazardous Materials by Highway' will be followed.	Resources and Waste	• During construction; • During operations.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Transport Control & Site Access Procedure	Whole Project	IFC General EHS Guidelines

242	C, O	Compliance with the Prime Ministry 'Stream Beds and Flood Control'.	Provisions of the Circular Letter No. 2006/27 of the Prime Ministry 'Stream Beds and Flood Control', will be followed.	Resources and Waste; The Terrestrial Water Environment; Socio economic	•During construction; •During operations.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	IFC General EHS Guidelines
243	C	General Construction	Provisions of the Highway Traffic Law will be complied with during construction.	Community Health and Safety; Labour and Working Conditions.	During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Transport Control & Site Access Procedure	Whole Project	IFC General EHS Guidelines
244	C	Structures and buildings regulatory compliance	Provisions of the Turkish 'Regulation on Structures to be Built in Disaster Areas' and Turkish 'Regulation on Buildings to be Built in Earthquake Areas' will be adhered to during construction.	Geology, Soils and Contaminated Land	During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Emergency Response Plan	Whole Project	IFC General EHS Guidelines
245	C	Material Supply and Transport from Quarries	Quarries that will be used will be either determined later by COK A.S. or will be up to the EPC Contractor will: • Include environmental and community HS factors like site sensitivity, travel routes, mining methods etc. in the decision-making process. • Whenever possible, general preference will be given to using existing (fully licensed) quarries over opening new quarries. • A due diligence will be conducted for existing quarries to ensure permits are valid and operations are in compliance. Relevant suggestions should be made to improve current standards of the quarry. Quarries should be monitored frequently. • In case of opening a new quarry, all necessary permits will be obtained, operations will be setup in accordance with international standards and quarries should be monitored frequently.	Resources and Waste	During construction	ESIA	Vol III. Ch. 2.1 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, including Waste Management Plan, Quarries Management Plan	Whole Project	IFC General EHS Guidelines
246	C, O	General Construction	Regular maintenance of all equipment and machinery will be performed in accordance with the manufacturers operating manuals and warranties. A central maintenance log book for all equipment and machinery will be maintained by the Project. Defective machinery will be replaced where required	Displacement of Existing Land, Use, Property and People; Socio economic	• 2 months before the schedule commencement of construction; •During construction.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Occupational Health & Safety Plan	Whole Project	IFC General EHS Guidelines
247	P, C, O	Permitting - water usage	Relevant permits will be obtained in accordance with the provisions of relevant Drinking Water Basin Regulations.	Terrestrial Water Environment	• 2 months before the schedule commencement of construction; •During construction; •During operations	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Environmental Management Plan	Whole Project	IFC General EHS Guidelines
248	C	Labour	Retrenchment of the construction workforce following the completion of construction activities will be done in compliance with all legal and contractual requirements.	Community Health and Safety; Labour and Working Conditions.	During construction	Turkish EIA	Vol II. Ch. 7	Employment Policy	HR & Worker Management Plan	Whole Project	IFC General EHS Guidelines
249	C	Habitat restoration	Revegetation (i.e. the sowing of native herbaceous species on top soils and/or the planting of native shrubs/trees) will be undertaken as soon as possible after clearance and construction. Revegetation will take place during the next appropriate season after construction, i.e. non-vegetative period.	Biodiversity and Conservation	During construction.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, HR & Worker Management Plan	Whole Project, where is the case.	IFC General EHS Guidelines
250	P, C	Control of risk of high concentration sediment releases	Risk of releasing high volumes of sediment from digging in-channel and also from redirecting the river flow may exist. At present the river crossings and stream deviations are in the planning phase. These risks will be considered and the mitigation will be in place in-channel to manage the risk of high concentration sediment releases.	Terrestrial Water Environment	• 2 months before the schedule commencement of construction; •During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	HR & Worker Management Plan, Environmental Management Plan	Whole Project, where is the case	IFC General EHS Guidelines
251	C	Injury from unsafe equipment use	Risks are to be minimised by reducing access to work areas, better access control such as fencing and sign posting, and construction site location selection, for example. The proposed mitigation plans are provided in the ESMP (Volume IV) which includes Community Safety Management Procedure and Community Project Education Programme	Community Health and Safety	During construction	ESIA	Vol III. Ch. 3.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan Environmental Management Plan	Whole Project	IFC General EHS Guidelines;
252	C	Surface and Groundwater Quality	Safe Fuelling and Gasoline Handling Guidelines will be developed in the construction areas. No fuelling of vehicles or equipment will take place within excavated areas, if practically feasible. If heavy equipment cannot be moved to appropriate fuelling points, an impervious surface (such as a drip-tray) has to be used for refuelling this equipment to hinder accidental spillage to drain into the soil and therefore in potential groundwater aquifers.	Terrestrial Water Environment	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, HR & Worker Management Plan, Transport Control & Site Access Procedure	Whole Project	IFC General EHS Guidelines, UK Design Manual for Roads and Bridges (DMRB)
253	P	Sand layers will be used as filters in seepage pits.	Sand layers will be used as filters in seepage pits (detritus basins in the form of a shallow pit connected to drain trenches), to prevent harmful substances from percolating into deeper soil layers or into the groundwater (this approach may not be feasible in highly vulnerable karst ground water systems or alluvial aquifers with high water tables and thin soil coverage).	Terrestrial Water Environment; Resources and Waste	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Management Plan	Whole Project	IFC General EHS Guidelines, Waste Management Procedure, KGM's Technical Specification for landscaping of

254	C, O	Loss of limited range distribution flora (Rorippa thracica, Ferulago confusa and Thymus atticus).	Seeds of limited range distribution flora (Rorippa thracica, Ferulago confusa and Thymus atticus) will be collected from the roadside to be used in the post-construction landscaping phase. Some of the collected seeds of the limited range distributed flora should be delivered to the Ankara Seed GenBank, for conversation purposes.	Biodiversity and Conservation	During construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, HR & Worker Management Plan	<ul style="list-style-type: none"> Rorippa thracica: KP 116+500, KP 118+500 and KP125+000. Ferulago confusa: KP 18+500, KP 121+000, KP 125+000, KP 126+500, KP 130+000, KP 136+000 and KP 137+500. Thymus atticus: KP 126+500. 	IFC General EHS Guidelines
255	C, O	Surface Water Bodies and Water Infrastructure (Channels)	Sensitive areas of rivers and drains will be protected from impacts of vehicles and other construction activities via fencing or other appropriate means.	Terrestrial Water Environment	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	IFC General EHS Guidelines
256	P,C,O	Local access	Several underpasses and culverts have been included in the design to ensure access of local people to agricultural lands. These underpasses and culverts will ensure sufficient dimensions for the passage of harvesters, vehicles, etc. where required. Public will be consulted regarding the construction of these and possible changes will be discussed with KGM.	Displacement of Existing Land, Use, Property and People	<ul style="list-style-type: none"> 2 months before the schedule commencement of construction; During construction; During operations. 	ESIA	Vol III. Ch. 3.2 Vol II. Ch. 15	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Land Acquisition, Compensation & Resettlement Framework	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	IFC General EHS Guidelines
257	C, O	Measures to ensure that the sites retain their significance and character.	Significant impacts, as a result of the development, on the setting of heritage sites can result in an effect on their significance. Mitigation measures, including screening, will be considered to ensure that the sites retain their significance and character. This is in line with IFC Performance Standard 8 (Cultural Heritage) and the ICOMOS xi'an declaration 2005	Archaeology and Built Heritage	<ul style="list-style-type: none"> During construction; During operations. 	ESIA	Vol III. Ch. 3.5 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Cultural Heritage Management Plan	Whole Project (onshore sections).	IFC General EHS Guidelines, IMO regulations
258	C, O	Child and forced labour controls.	Similarly, COK A.S. will prohibit the use of forced labour by ensuring full compliance with national legislation and the provisions of relevant conventions and other international standards. These measures will be reflected in the Project's Employment Policy Document.	Labour and Working Conditions	<ul style="list-style-type: none"> 2 months before the schedule commencement of construction; During construction; During operations. 	ESIA	Vol III. Ch. 3.3 Vol II. Ch. 7	Employment Policy	HR & Worker Management Plan, Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	IFC General EHS Guidelines
259	C	Surface and Groundwater Quality	Spoil and soil storage areas and open stores of construction materials will be designed and managed to control loss of sediments into run-off by minimizing the length and angle of slopes.	Terrestrial Water Environment	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, HR & Worker Management Plan	Whole Project	IFC General EHS Guidelines, Environmental and Social Management Plan
260	C, O	Waste and Wastewater	Storage and management of wastes will be undertaken in accordance with international best practice (IFC EHS General Guideline).	Resources and Waste	<ul style="list-style-type: none"> During construction; During operations. 	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	IFC General EHS Guidelines, UK Design Manual for Roads and Bridges
261	C	Labour	Suitable and compliant (with Turkish requirements) first-aid facilities and treatment will be provided at all times at the working/construction sites.	Community Health and Safety; Labour and Working Conditions.	During construction	Turkish EIA	Vol II. Ch. 7	Employment Policy	HR & Worker Management Plan, Occupational Health & Safety Plan, Biodiversity Action Plan, Environmental Management Plan	Whole Project	IFC General EHS Guidelines
262	P, C	Temporary fencing.	Temporary fencing will be implemented to obstruct intense construction activity areas. Impact duration will be minimised by reducing the duration of the bridge construction as much as possible. Impact magnitude will be minimised by separating construction activities into small scale parts.	Landscape and Visual	Pre-construction (final construction schedule finalised 2 months prior to construction). During construction	ESIA	Vol III. Ch. 2.7 Vol II. Ch. 7	Environmental and Social Management Plan, Land Acquisition, Compensation & Resettlement Framework	Community H&S&Security CMP, Environmental Management Plan	Whole Project	IFC General EHS Guidelines
263	O	Occupational Health and Safety	Temporary traffic control planning will be developed when the normal function of the Motorway is suspended for the continuity of the movement of vehicles and transit operations. The traffic control planning will have the objective to provide for safe and efficient movement of road users through and around temporary traffic control zones which protecting workers, responder to traffic incidents and equipment. The planning will include KGM standards such as "Road Construction and Maintenance Traffic Signage Use Standards"	Community Health and Safety; Labour and Working Conditions.	During operations	ESIA	Vol II. Ch. 7	Environmental and Social Management Plan	Transport Control & Site Access Procedure, Community H&S&Security Management Plan	Whole Project	IFC General EHS Guidelines

264	C	Shipping-related accidents and accidental spillages	The bridge designers will coordinate installation of relevant equipment, as well as warning lights, to mark the tower piers and pier protection structures. The entire process will be managed by the Port authority, KGM and other relevant authorities.	Biodiversity and Conservation	During construction.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Marine Safety for Tower Foundation Procedure	Bridge.	IFC General EHS Guidelines
265	P, C	Stakeholder Engagement Plan (SEP)	The CLO will pay special attention to landowners/residents in the nodal areas where the different segments of the overall KGM Motorway Project overlap, and engage with CLO-counterparts (if any) in the other segments.	Cumulative Impacts	P/C	ESIA	Vol II. Ch. 8	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Land Acquisition, Compensation & Resettlement Framework	Stakeholder Engagement and Grievance Mechanism Procedure,	Whole Project	IFC General EHS Guidelines, Environmental and Social Management Plan, Waste and Wastewater Management Procedure, Dredged Material Management
266	P, C	Stakeholder Engagement Plan (SEP)	The CLO will pay special attention to landowners/residents in the nodal areas where the different segments overlap, and engage TANAP counterparts. TANAP will be included as a Project stakeholder in the SEP.	Cumulative Impacts	P/C	ESIA	Vol II. Ch. 8	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Land Acquisition, Compensation & Resettlement Framework	Stakeholder Engagement and Grievance Mechanism Procedure	Close to TANAP pipeline crossings	IFC General EHS Guidelines
267	C	Workforce training provision	The construction contractors will be required to provide orientation training to their workforces that underline the potential risks/impacts that exist with respect to the relations with the local communities, and the appropriate preventive measures.	Community Health and Safety	During construction	ESIA	Vol III. Ch. 3.4 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	HR & , Environmental Management Plan, Occupational H&S Plan, Community H&S&Security Management Plan	Whole Project	IFC General EHS Guidelines, IMO COLREGS
268	C, O	Construction material and waste generation, handling and disposal	The construction material and waste generation, handling and disposal will be monitored during the construction and operation phase of the Project. The monitoring program will include the following key items: <ul style="list-style-type: none"> • Reviewing quarry operations and auditing against commitments • Review of construction and operation material management of EPC contractor • Recording of waste generation in terms of type (EU Waste Code) and quantity at all points of generation (camps, quarries, plants, toll road stations) • Keeping a record of the types and quantities of wastes that are reused, recycled, recovered or disposed both on and off the site to assess waste hierarchy effectiveness • Auditing and recording waste storage and handling conditions and recording non-compliances • Records of the waste disposal facilities being used and periodic auditing of the permits, facility visits or exemptions held by the sites that the waste is taken to • Recording of the licensed operators who remove the waste • Recording all waste transfer notes and hazardous waste consignment notes note where the waste is being taken. 	Resources and Waste	•During construction; •During operations.	ESIA	Vol III. Ch. 2.1 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Quarries and AF Management Plan	Whole Project	
269	C	Socio-Economic	The Directorate of Provincial Food Agriculture and Livestock of the Çanakkale and Tekirdağ Provinces will be consulted for land screening and investigation reports and all of these will be obtained 2 months before commencement of construction.	Socio Economics; Displacement of Existing Land, Use, Property and People	During construction	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, HR & Worker Management Plan	Whole Project	

270	P, C	Traffic Management procedures	<p>The EPC construction contractor will have management procedures which will include the elements mentioned below. In addition, the contractor will be obliged to monitor driver behaviour, especially for routes that are subject to frequent accidents, and implement corrective action to prevent recurrence.</p> <ul style="list-style-type: none"> • Minimise pedestrian interactions with the construction vehicles by implementation components of the traffic management plan and community interaction through the SEP as well as collaborating with local communities on education concerning traffic and pedestrian safety; • Improve local traffic signage by collaboration with the responsible local authorities and communities; • Implementation of appropriate temporary traffic control planning during repair and maintenance works on the Motorway and Bridge; • Coordinate with emergency responders to ensure that appropriate first aid is provided in the event of accidents; • Control and maintenance of embedded control obstacles against ingress into the Motorway; • Details of the nature of the emergency will be communicated and the EPR Plan will be published and made accessible for the local communities; • As part of the Community Relations Management Plan, COK A.Ş. will develop and implement a series of security measures, for the construction stage and operation of the Project; these will include the installation of sufficient and adequate site boundary and access controls near settlements to prevent unauthorised entry to construction sites especially by children (e.g. fencing of construction section in the vicinity of settlements or communities). • Sufficient passages (vehicle and pedestrian) crossing the highway to ensure that pedestrians or others do not enter the highway at unauthorized points. 	Community Health and Safety	<ul style="list-style-type: none"> • 2 months before the schedule commencement of construction; • During construction. 	ESIA	Vol III. Ch. 3.4 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Biodiversity Action Plan, Environmental Management Plan, Transport Control and Site access Procedure	Whole Project	
271	O	Environmental Operation Management Plan	<p>The following mitigation procedures will be included within the Environmental Management Plan and related plans during the operation phase:</p> <ul style="list-style-type: none"> • Personnel responsible for the application of herbicides in the maintenance of ROW will receive applicable certifications or equivalent training where such certifications are not required. • Measures for the case of lorry spills, fire, etc. involving hazardous/polluting substances along the Motorway will be included within the EPR Plan to prevent and clean up any significant impacts from drainage of contaminated liquids and fire-fighting water. Appropriate spill response equipment must be available along the route, with particular emphasis on quick-response in areas of higher ecological sensitivity. • spillage risk assessment will be undertaken in accordance with the UK Design Manual for Roads and Bridges (DMRB) as part of the development of the Environmental Management Plan (e.g. to determine the areas of the Motorway most susceptible to spills/accidents, sensitive areas compare with local response capability/backup capacity) to determine the optimal location and type of emergency response equipment and the required capacities for handling liquid spills. The spill risk assessment will be completed during the final design of the Motorway taking into account that no oil/water separators are typically adopted by KGM. • The Landscape Management Procedure to be developed will address integrated vegetation management (IVM) for the maintenance of the ROW to ensure that biological, mechanical and thermal vegetation control measures are used where practical, and avoid the use of chemical herbicides. The Landscape Management Procedures will specify that when using pesticides and herbicides for the maintenance of ROW, potential impacts to soil and groundwater will be minimised by implementing landscaping plans which have to be submitted to KGM for approval. These plans will address pesticide management and the following measures: <ul style="list-style-type: none"> - Comply with Turkish regulations on pesticide use. If pest infections are detected the competent authority needs to approve respective pesticide/biocide for pest control. Pesticides of WHO Type 1a and 1b will not be used; - Only use registered or approved() herbicides, and ensure they are properly labelled; - Select applicable technologies and practices designed to reduce unintentional drift or runoff; - Establish buffer zones or strips along water sources and surface water bodies; and - Store appropriately by following good hazardous materials storage and handling management practices. 	Geology, Soils and Contaminated Land	During operation	ESIA	Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Environmental Management Plan, HR & Worker Management Plan, Transport Control & Site Access Procedure, Emergency Response Plan	Whole Project	

272	C	Hazardous Materials Management Procedures	The Hazardous Materials Management Procedures will specify that fuels, oils and chemicals will be stored on an impervious base protected by a bund, and drip trays will be used for fuelling mobile equipment. No USTs will be used during construction stage. These procedures will be in line with Environmental, Health, and Safety (EHS) Guidelines: Environmental Hazardous Material Management (IFC, 2007). As example secondary containment structures will consist of berms, dikes, or walls capable of containing the larger of 110 percent of the largest tank or 25% percent of the combined tank volumes in areas where hazardous materials are handled (e.g. fuel stores and loading areas, concrete mixing, hazardous material stores) to prevent hazardous materials entering the site drainage.	Geology, Soils and Contaminated Land	During construction	ESIA	Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	
273	C, O	Emergency Prevention and Response Plan (EPR Plan)	The key mitigation to be implemented involves the adoption of road traffic management measures, including an effective spill containment and clean-up plan, as per the EPR Plan specified in the ESMP. The EPR Plan will be prepared for the construction stage, and then updated later to apply to Motorway and Bridge operations.	Biodiversity and Conservation	•During construction; •During operations.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Emergency Response Plan, Transport Control & Site Access Procedure	Whole Project (onshore & offshore).	
274	P, C	Changes to Water Exchange	The location and design of bridge towers, cabling, piers, foundations and support works will take currents and hydrography into account.	Marine Physical	• 2 months before the schedule commencement of construction; •During construction.	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Bridge.	
275	P, C	Emergency Prevention and Response Plan (EPR Plan)	The Management System of the Project will contain an Emergency Prevention and Response Plan (EPR Plan) that considers the role of communities and community infrastructure as appropriate in responding to emergency events.	Community Health and Safety	• 2 months before the schedule commencement of construction; •During construction	ESIA	Vol III. Ch. 3.4 Vol II. Ch. 7	Environmental and Social Management Plan	Emergency Response Plan	Whole Project	
276	C	The Marine Environmental Design Management Plan (MEDMP)	The Environmental Management Plan and the Marine Safety for Tower Foundation Procedure which will include procedures on marine environmental design management will include, among others, the following considerations: • Design of sediment traps and oil-water separators to prevent contaminated runoff from land-side approach roads at the DS into the marine environment; • Design specifications to allow the use of biodegradable hydrocarbons (ie less harmful oils and lubricants) for plant and equipment employed on or close to marine environments.	Marine Physical	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Marine Safety for Tower Foundation Procedure, Marine Safety for Tower Foundation Procedure	Whole Project	
277	C, O	Monitoring of the surface water quality	The monitoring of the surface water quality will be based on the General EHS Guidelines, especially with regard to emissions or effluents from road maintenance facilities. These will include: • Monitoring of surface water quality prior to construction process to establish full baseline. • Periodic monitoring of surface water quality during construction period and operation periods within the surface water resources. This will include streams as well as receiving water bodies. The locations will also include upstream locations of potential impacts to assess how surface water quality is changing with time. • Assessment of flooding conditions after heavy rainfall events for efficiency of water conveyance systems.	Terrestrial Water Environment	During construction and operations	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	IFC General EHS Guidelines
278	C	Noise reduction from construction transportation.	The Motorway alignment will be used for construction-related transportation and movement of construction goods, materials and equipment whenever possible.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Transport Control & Site Access Procedure	Whole Project	IFC General EHS Guidelines
279	P, C	Motorway incidents	The Motorway and its structures will need to be designed to meet Turkish and international standards for design and operation to minimise the risks and provide appropriate response in the event of an incident occurring. With adoption of the COK A.S. EPR Policy, COK A.S. will commit to set-up and implement: (1) measures to prevent emergencies; (2) measures to respond to emergencies; and (3) measures to assess damages and recover after emergencies.	Community Health and Safety	• 2 months before the schedule commencement of construction; •During construction.	ESIA	Vol III. Ch. 3.4 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Emergency Response Plan,	Whole Project	IFC General EHS Guidelines
280	P	Routing the Motorway.	The Motorway will be routed away from sensitive areas. Where necessary, the Project will engage with local authorities and regulators to finalise the sensitive areas to be avoided. Should significant design and routing changes be adopted; further assessment work (via the change management system) will be undertaken with additional mitigation measures developed (where necessary).	Noise and Vibration; Community Health And Safety	During pre-construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Environmental Management Plan, Stakeholder Engagement and Grievance Mechanism Procedure, Transport Control & Site Access Procedure, Biodiversity Action Plan, Environmental Management Plan	Near settlements	IFC General EHS Guidelines
281	C, O	Landform in noise attenuation.	The natural topography will be utilised, as far as possible, for noise shielding measures. Any final changes for construction or operation will specifically consider this measure.	Noise and Vibration	•During construction; •During operations.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	IFC General EHS Guidelines

282	C, O	Socio-Economic	The Pastoral Law on the Protection and Use of Agricultural Land and Pasture Law No. 4342, Soil Protection and Land Use Law and Law No. 3573 on Breeding of Olive Tree and Immunization of Orchards will be complied with in relation to the final design of the Project, as well as construction and operation.	Socio Economics; Displacement of Existing Land, Use, Property and People	•During construction; •During operations.	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, HR & Worker Management Plan	Whole Project	IFC General EHS Guidelines
283	P	Petrol filling stations - Safety requirements	The petrol stations at the 4 rest areas will be designed to TS 12820: 2006 Petrol filling stations - Safety requirements. These safety requirements satisfy the design needs stated in the IFC Environmental, Health, and Safety Guidelines for Retail Petroleum Networks (IFC, 2007). The infrastructure design takes into account the following: - Tanks and Piping - Fuel Dispensing Equipment - Fuel Delivery Equipment - Vapor recovery systems which are in line with the IFC retail station EHS guidelines.	Terrestrial Water Environment	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, HR & Worker Management Plan, Transport Control & Site Access Procedure	Whole Project	IFC General EHS Guidelines
284	C	Seismic design and risk assessment	The Project design will consider the relevant Turkish regulatory requirements related to seismic design and risk assessment and also the findings of the site specific geological/geotechnical investigation study. The Regulation on Buildings to be Built in Seismic Zones (Official Gazette date/no: 06.03.2007/26454) will be complied during all construction works within the Project site for the Motorway Section. • Inclusion of a new extensive chapter on seismic safety assessment and retrofitting of existing buildings • Inclusion of a linear elastic method for seismic safety assessment considering the inelastic behavior in terms of approximate allowable demand/capacity ratios given depending on the damage level • Inclusion of the performance-based assessment principles for existing structures in seismic safety evaluation and retrofitting • Inclusion of different levels of design earthquakes (such as service, design and maximum earthquakes) and performance levels (such as immediate occupancy, life safety and collapse prevention) to be considered for various types of buildings The seismic design of the 1915 Çanakkale Bridge will be in compliance with the British Standards (BS), Eurocode, Technical Specifications of the AASHTO, European and/or other international standards in coordination with KGM and its consultant.	Geology, Soils and Contaminated Land	During construction	ESIA	Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Emergency Response Plan, Biodiversity Action Plan Environmental Management Plan	Whole Project	IFC General EHS Guidelines
285	C	Compliance with the Water Pollution Control Regulation.	The Project route passes through preservation areas of the Yenice-Gonen Dam, which is being used as drinking and utility water. The Project will ensure that all relevant precautions included in the Turkish 'Water Pollution Control Regulation' will be followed.	Resources and Waste; The Terrestrial Water Environment	During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Yenice-Gonen Dam area	IFC General EHS Guidelines
286	C	Compliance with the IMO (International Maritime Organization).	The Project will adhere to IMO regulations to prevent the introduction or spread of invasive species, including from the hulls of construction vessels and from ballast water.	Marine Physical	During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Environmental Management Plan	Whole Project	IFC General EHS Guidelines
287	P	Ecological field survey.	The Project will arrange an ecological field survey in order to identify collision risks of migrating flocks of Yelkouan shearwater moving to/from the Black Sea areas along the Çanakkale strait (and enable to gather more accurate information based on which both the impact assessment and the CH status could be reviewed). A detailed ToR about these surveys is included in the Annex III.2.4a. and should include engagement with local NGO's or ongoing Projects aimed at this species.	Biodiversity and Conservation	Urgently/ 2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Stakeholder Engagement and Grievance Mechanism Procedure	Çanakkale Strait IBA protected area.	IFC General EHS Guidelines,
288	P	Ecological field survey.	The Project will arrange an ecological field survey in order to identify presence / absence of lesser white-fronted goose (Anser erythropus) and red-breasted goose (Branta ruficollis) in those areas of the Saros Bay IBA located within the study area that are susceptible to be impacted by the project activities. This field survey will also determine the presence of suitable areas for breeding of collared pratincole (Glareola pratincola), which is also a triggering species of the Saros Bay IBA, in order to inform the need of conducting winter surveys to verify if it breeds within/adjacent to the construction area near Saros Bay IBA. A detailed ToR about these surveys is included in the Annex III.2.4a. A Supplemental Assessment would be done following this additional bird survey, in order	Biodiversity and Conservation	Urgently/ 2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan	Saros Bay IBA protected area.	IFC General EHS Guidelines, Soil Management Procedure
289	C, O	Management of navigation risk.	The Project will comply with all requirements for maritime navigation procedures as specified by the Undersecretaries of Maritime Affairs. Management of navigation risk in Çanakkale strait (including the Project Area) falls primarily under the responsibility of the Undersecretaries of Maritime Affairs, e.g via the full implementation of the TSS, application of pilotage procedures for ships passing through the strait, and placement of marine markers, buoys, and lights to indicate hazards and obstructions to navigation.	Biodiversity and Conservation; Marine Physical	•During construction; •During operations.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Marine Safety for Tower Foundation Procedure	Dardanelles Strait.	IFC General EHS Guidelines, British Standards (BS), Eurocode, Technical Specifications of the AASHTO, European and/or other international standards

290	C, O	Compliance with the National Parks, Terrestrial Hunting laws, the Bern and the CITES conventions	The Project will comply with the provisions of the 'National Parks Law No. 2873', the 'Terrestrial Hunting Law No. 4915', the Bern Convention and the CITES Convention in the course of construction and operation.	Biodiversity and Conservation	During construction During operation	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Environmental Management Plan	Whole Project	IFC General EHS Guidelines, Waste Management Procedure
291	P	Mitigation measures for impacts on water flow due to disruption to flooding controls and irrigation systems.	The Project will conduct a detailed pre-construction survey that will be signed off by land owners.	Socio economic	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 3.1 Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Land Acquisition, Compensation & Resettlement Framework	Stakeholder Engagement and Grievance Mechanism Procedure, Environmental Management Plan	Whole Project	IFC General EHS Guidelines, Soil Pollution Control and Regulated Polluted Areas Directive and best international practices
292	C	Mitigation measures for impacts on utility supply during construction.	The Project will conduct an assessment of public utilities including connection points to electricity grid, sewer system, and water supply at local and regional levels and will assess the situation of settlements and industry close or in the vicinity of the construction camp and other associated facilities to ensure no reduction in services available to local settlements occurs.	Socio economic	During construction	ESIA	Vol III. Ch. 3.1 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Environmental Management Plan, Supply Chain Management Plan	Whole Project	IFC General EHS Guidelines
293	C	Designing the transport routes.	The Project will design the transport routes to avoid populated areas, as much as possible.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Environmental Management Plan, Stakeholder Engagement and Grievance Mechanism Procedure, Transport Control & Site Access Procedure, Environmental Management Plan	Whole Project	IFC General EHS Guidelines
294	P, C	Noise baseline survey plan.	The Project will develop a comprehensive noise baseline survey plan to be issued to approval by the end of August 2018 or when the detailed design are available. The baseline will be quantified during the detailed design stage. A noise model will be constructed to predict the noise from the existing road, which is the main source at most receptor locations. The model will be validated using measurements where necessary and this will be used to establish baseline noise levels at key locations where the impacts are predicted. This will be used to inform the detailed design of mitigation.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Near settlements	IFC General EHS Guidelines, Terrestrial Environmental Design Management Plan
295	C	Habitat restoration	The Project will develop habitat restoration/revegetation measures on temporary construction areas through the Soil Erosion Reinstatement and Landscape Management Plan	Biodiversity and Conservation	During construction.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, HR & Worker Management Plan	Whole Project, where is the case.	IFC General EHS Guidelines
296	C	Biodiversity regulation compliance	The Project will employ an "Ecological Clerk of Works" (ECoW) who will prepare the environmental documentation on delivery of ecological requirements on site before construction activities commence. This will help to ensure contractors meet key development milestones. The ECOW will monitor site based construction activities and ensure their delivery in accordance with relevant laws and Project commitments. The ECOW will also be responsible for the technical implementation and delivery of the biodiversity and conservation measure and commitments.	Biodiversity and Conservation	During construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Environmental Management Plan	Whole Project	IFC General EHS Guidelines, Waste Management Procedure
297	C	Workers trainings.	The Project will ensure that the construction sites are kept tidy. Workers will have necessary knowledge/training about the issue of landscape and visual impacts.	Landscape and Visual	During construction	ESIA	Vol III. Ch. 2.7 Vol II. Ch. 7	Environmental and Social Management Plan, Employment Policy	HR & Worker Management Plan, Soil erosion, Reinstatement and Landscape Management Plan, Environmental Management Plan	Whole Project	IFC General EHS Guidelines, EPR Plan, Landscape Management Procedure, EHS guidelines for Environmental, Health, and Safety Guidelines for Toll
298	C	No storage of the waste and other chemical products near the freshwater features.	The Project will ensure that wastes and any other product containing hazardous chemical substances (i.e. fuel) will not be stored in proximity to freshwater features. Any hazardous materials will be managed in line with relevant regulations and best practice guidelines. These materials will be managed according to an Environmental Management Plan that will consider among their objectives the avoidance of any spill that could affect freshwater ecosystems.	Biodiversity and Conservation	During construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Environmental Management Plan	KP 110+500, KP 131+000, KP 135+500, KP 141+000, KP 148+000, KP 178+500, KP 196+500 and KP 198+500	IFC General EHS Guidelines; EPRP

299	C	Use of piling protocol	The Project will follow the JNCC Statutory nature conservation agency protocol for minimising the risk of injury to marine mammals from piling noise, which include for this specific case any marine mammals or turtle observed, e.g. • Implementation of in-situ noise monitoring of initial piling activities, including pre-construction background noise baseline to aid interpretation of results. • If results are above standards (NOAA or German, to be decided), Project will implement the use of a noise reduction device or change in methodology.	Biodiversity and Conservation	During construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan	Bridge.	IFC General EHS Guidelines, SEP
300	P, C	In-situ noise monitoring of initial piling activities.	The Project will implement in-situ noise monitoring of initial piling activities, including pre-construction background noise baseline to aid interpretation of results.	Biodiversity and Conservation	• 2 months before the schedule commencement of construction; • During construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan	Bridge.	IFC General EHS Guidelines, Community Relations Management Plan
301	C, O	Continued Assess for Intangible Cultural Heritage:	The project will maintain access to special areas identified for local intangible Cultural Heritage rituals and traditions, as identified by the Socio-Economic Survey (Table 8.1, Annex III.3.1). This will assure no impact occurs on the Intangible Cultural Heritage as a result of the development. This is in line with IFC Performance Standard 8 (Cultural Heritage).	Archaeology and Built Heritage	• During construction; • During operations.	ESIA	Vol III. Ch. 3.5 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Cultural Heritage Management Plan	Whole Project (onshore sections).	IFC General EHS Guidelines; SEP; EPRP Community Relations Management Plan;
302	C	Maintaining the existing road network.	The Project will maintain the existing road network by keeping it open to the public during construction through the use of diversions when closure of a given road is required. Where roads are closed, local solutions (including diversions if necessary) will be put in place.	Socio economic	During construction	ESIA	Vol III. Ch. 3.1 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Transport Control & Site Access Procedure	Whole Project	IFC General EHS Guidelines
303	C, O	Occupational Health and Safety	The Project will meet the requirements of Turkish Law on Occupational Health and Safety and Regulation on the Use of Personal Protective Equipment at/in Workplaces, which has been prepared in parallel with the relevant European Union Directives.	Community Health and Safety	• During construction; • During operations.	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Employment Policy	Stakeholder Engagement and Grievance Mechanism Procedure, Occupational Health & Safety Plan	Whole Project	IFC General EHS Guidelines; ESMP
304	C	Change of habitat.	The Project will monitor the natural re-instatement of seagrass in the dry dock access channel area after finalisation of works. If natural re-instatement of the damaged habitat does not take place, these habitats will be re-instated using appropriate techniques to restore or re-create original habitat present.	Biodiversity and Conservation	During operations.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, HR & Worker Management Plan	Bridge. Dry dock	IFC General EHS Guidelines; ESMP; Hazardous Materials and Waste Management Procedures; Environmental Management Plan; EPRP Guidelines
305	C	Acoustic enclosures.	The Project will provide acoustic enclosures where works may cause potential noise impacts (as defined in the noise section of the ES) on nearby sensitive receptors, and where these will be beneficial in reducing noise.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Near settlements	IFC General EHS Guidelines
306	C	Labour	The Project will provide adequate lighting for night-time construction works to be completed safely at each stage of work as it progresses. The lighting system must comply with best practice and must not inhibit the visio of road users on or off-site	Community Health and Safety; Labour and Working Conditions.	During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Occupational Health & Safety Plan, Biodiversity Action Plan, Environmental Management Plan	Whole Project	IFC General EHS Guidelines; ADR regulations;
307	C, O	Labour	The Project will provide personal protective equipment/devices (PPE/PPD) and seasonal working outfits to all workers at no cost. PPE/PPD equipment will meet the requirements of the Turkish Law on Occupational Health and Safety and Regulation on the Use of Personal Protective Equipment at/in Workplaces and best site practices to ensure the safety of all workers	Community Health and Safety; Labour and Working Conditions.	• During construction; • During operations.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	HR & Worker Management Plan, Occupational Health & Safety Plan	Whole Project	IFC General EHS Guidelines; EPRP
308	P	Final Lender review of all pre-construction designs and related details	The Project will submit all final designs, detailed designs, design changes, and final construction methodology details (inc. schedules, programmes and plans) to Lenders for review and approval.	All	2 months before the start of construction	ESIA	All	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure, Change Management Plan	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	IFC General EHS Guidelines
309	C	Topsoil management	The Project will take all necessary precautions on topsoil management in line with relevant regulations and best practice.	Geology, Soils and Contaminated Land	During construction	Turkish EIA	Vol III. Ch. 2.2	Environmental and Social Management Plan	Soil erosion, Reinstatement and Landscape Management Plan, Environmental Management Plan	It is started to be taken in dry dock. Will be implemented where necessary	IFC General EHS Guidelines; IFC PS4; ESMP
310	C	General Construction	The proposed maintenance area located in Lapseki district borders, will be constructed outside of 126 Block, 87 Parcel in accordance with the opinion letter of the Canakkale Province, Municipality of Lapseki.	Community Health and Safety.	During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	IFC General EHS Guidelines; EPRP

311	C	General Construction	The provisions of the 'Regulation on Electricity Powered Current Facilities' will be complied with during all construction works.	Community Health and Safety; Labour and Working Conditions.	During construction	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Environmental Management Plan	Whole Project	IFC General EHS Guidelines
312	C	Waste and Wastewater	The provisions of the 'Regulation on the Control of Excavation Soil, Construction and Demolition Wastes' and the 'Regulation on Landfill of Wastes' will be complied with during the transportation and storage of excavated material.	Resources and Waste	During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Soil erosion, Reinstatement and Landscape Management Plan	Whole Project	IFC General EHS Guidelines
313	C, O	General Construction	The provisions of the "1/100,000 scaled Environmental Plan of Balıkesir-Canakkale Planning Zone" will be complied with. The Project will undertake consultation with the relevant authority before the design is finalised and request the input of the regulators who are responsible for the Environmental Plan of Balıkesir-Canakkale Planning Zone	Displacement of Existing Land, Use, Property and People; Socio economic	• 2 months before the schedule commencement of construction; • During operations.	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	IFC General EHS Guidelines; Grievance Procedures
314	C, O	Waste and Wastewater	The provisions of the Regulation on Waste Oil Management will be complied with in relation to the management, handing and disposal of waste oil and related wastes.	Resources and Waste	• During construction; • During operations.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Transport Control and Site access Procedure	Whole Project	IFC General EHS Guidelines; Community Relations Management Plan
315	C, O	Noise regulatory compliance	The provisions of the Turkish 'Regulation on Assessment and Management of Environmental Noise' will be adhered to during construction and operation phases.	Noise and Vibration; Community Health And Safety	• During construction; • During operations.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Environmental Management Plan, Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	IFC General EHS Guidelines; Community Relations Management Plan
316	C, O	Air and Climate regulatory compliance	The provisions of the Turkish 'Regulation on Control of Exhaust Gas Emission and Quality of Benzine and Diesel' will be adhered to during construction and operation phases.	Air and Climatic Factors	• During construction; • During operations.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Environmental Management Plan, Stakeholder Engagement and Grievance Mechanism Procedure, Transport Control & Site Access Procedure, Marine Safety for Tower Foundation Procedure	Whole Project	IFC General EHS Guidelines
317	C	Waste and Wastewater	The provisions of the Waste Management Regulations will be complied with in relation to the management, handing and disposal of hazardous wastes.	Resources and Waste	During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Transport Control and Site access Procedure, Transport Control and Site access Procedure	Whole Project	IFC General EHS Guidelines; Grievance Procedures
318	C, O	Dust generation	The sensitivity of the area to dust soiling, human health impacts was assessed for each dust-generating activity. There are medium sensitivity receptors in close proximity to the Project, in a small number of concentrated areas. Mitigation measures which are expected to be embedded within the Project as part of an approved management plan to be developed by the contractor.	Community Health and Safety	• During construction; • During operations.	ESIA	Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project, where is the case.	IFC General EHS Guidelines
319	O	Dissemination of Findings (Publication):	The sharing of information obtained through the course of investigations and studies to the wider public, both in academic and general form, can reduce the impact on the Cultural Heritage through raising awareness of the asset and its value. This is in line with IFC Performance Standard 8 (Cultural Heritage). Details will be outlined in Cultural Heritage Management Plan.	Archaeology and Built Heritage	During operations	ESIA	Vol III. Ch. 3.5 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Cultural Heritage Management Plan	Whole Project (onshore and offshore sections).	IFC General EHS Guidelines
320	C	Surface and Groundwater Quality	The size and duration of exposure of areas of open ground will be kept to the minimum.	Terrestrial Water Environment	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	HR & Worker Management Plan, Environmental Management Plan	Whole Project	IFC General EHS Guidelines; KGM Road Construction and Maintenance Traffic Signage Use Standards
321	C	Soil contaminated due to spillages	The soil contaminated due to spillages during handling fuel and other hazardous liquids will be removed from the site for suitable treatment and/or disposal according to the Waste Management Procedure.	Geology, Soils and Contaminated Land	During construction	ESIA	Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, HR & Worker Management Plan	Whole Project	
322	P	The soil stability identified at the critical locations need to be taken in to the design stage of the Motorway	The soil stability identified at the critical locations need to be taken in to the design stage of the Motorway. Presently the designs are not finalized and need to incorporate appropriate embedded design states to lower the major impact significance.	Geology, Soils and Contaminated Land	2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Soil erosion, Reinstatement and Landscape Management Plan	Whole Project	

323	P, C	Stakeholder Engagement Plan (SEP)	The stakeholder engagement activities will serve to inform the local communities regarding potential health and safety, and water issues during the construction period. Community health and safety information will be disclosed to the communities in line with the Stakeholder Engagement Plan (SEP). Issues pertaining to water, such as potential shortage or disruption due to construction is discussed with stakeholders. The stakeholder engagement activities will include the community meetings with the vulnerable and marginalized groups such as children and young persons (including visits to schools) and local postings to inform the public regarding the relevant hazards for their particular locations. Details on the on-going stakeholder engagement activities are outlined in the SEP; this plan will be updated to address the upcoming construction stage and will address the planned regular community liaison activities and notification of exceptional events.	Community Health and Safety	• 2 months before the schedule commencement of construction; • During construction.	ESIA	Vol III. Ch. 3.4 Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	
324	C	The statutory obligations and contractual commitment of marine contractors to adhere to the IMO regulations	The statutory obligations and contractual commitment of marine contractors to adhere to the IMO regulations on ballast water management and hull fouling control will sufficiently minimise the potential for introduction of invasive species.	Marine Physical	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Marine Safety for Tower Foundation Procedure	Marine part of project	
325	C, O	Hazardous materials	The storage, handling, transport and disposal of all hazardous materials will comply with legal requirements, and with adoption of good construction site practices (e.g., appropriate locked storage and sign-posting of hazardous materials). Access control/restrictions to the construction site will be provided, and thus the risks to the community through exposure to hazardous materials during construction of the Motorway are expected to be very limited. Best practice measures to avoid and minimise risks from hazardous materials will need to be detailed in the Hazardous Materials and Waste Management Procedures and the ESMP (Volume IV). They will involve inter alia the following key principles: • Strict control of selection, storage, use and disposal of hazardous materials during construction in accordance with legal requirements regarding worker health and safety and environmental protection, and good industry practice. • Reducing inventories of hazardous material through inventory management to reduce or to eliminate the potential off-site consequences of a release. • Inclusion of buffer strips or other forms of physical separation around the project site to protect the public from major hazards associated with hazardous materials incidents or process failure, as well as nuisance issues related to noise, odours, or other emissions. • Immediate containment, clean up and disposal of spills of hazardous materials during construction and operation in accordance with the Environmental Management Plan. COK A.S will ensure that adequate spill kits will be provided and staff trained in their use. • Transport of hazardous materials and wastes by licensed contractors only, and ensure all necessary authorisations are held according to international requirements and correct procedures been followed. • Development and implementation of effective emergency prevention and response plans to minimise the occurrence of accidents and deal with their consequences if they occur – as already outlined in the COK A.S. EPR Policy. • Vehicles that transport hazardous and special loads will require a specific transport permission from the KGM to access the Motorway (similar measures are currently adopted at certain other	Community Health and Safety	During construction and operation	ESIA	Vol III. Ch. 3.4 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Biodiversity Action Plan, Control of Substances Hazardous to Health Procedure	Whole Project	
326	P	Sustainable road drainage and storm water management practices.	The sustainable road drainage and storm water management practices will be assessed during the design stage with international guidelines (such as the AASHTO Highway Drainage Guidelines or similar guidelines) to minimize impacts of road drainage on surrounding surface water, marine water, ground water, land use and soil resources and sensitive ecological receptors. Such practices may include measures to slow peak runoff flow (retention basins, rock/riprap), reduce sediment load, detention ponds or basins. In addition to pollution risks, the assessment will include consideration of drainage outfall siting and potential for erosion and flooding of farmlands and other sensitive land uses and ecological receptors. The assessment shall identify mitigations so that significant impacts are avoided.	Terrestrial Water Environment	During design/ 2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	
327	C	Hazardous materials	The transport of hazardous material will be in accordance with ADR regulations (as adopted in Turkish regulations). Trucks transporting hazardous materials (e.g. Class 1 and 2) will not be allowed to use the bridge whereas some of the chemicals will be allowed to cross only under controlled conditions. Generally, the transport of hazardous and special loads will require transport permission from the KGM - General Directorate of Highways to access the Motorway.	Community Health and Safety	During construction	ESIA	Vol III. Ch. 3.4 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Transport Control & Site Access Procedure, Biodiversity Action Plan, Control of Substances Hazardous to Health Procedure	Whole Project	

328	C	Critical area (viaduct)	The viaduct piers may be subject to the bearing capacity issues. There is a risk of ground liquefaction due to the high groundwater level and silt-sand units. The Project will therefore implement a piled footing system.	Geology, Soils and Contaminated Land	During construction	ESIA	Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Soil erosion, Reinstatement and Landscape Management Plan	KM 168+305 - 169+898	
329	C, O	Water Management Procedure	The Water Management Procedure will include monitoring of surface water quality, drainage infrastructure assessment as well as ground water quality procedures. The monitoring of the groundwater resources will be based on guideline to be developed following the hydrogeological investigations. The guideline will be based on the Guidance on Groundwater Monitoring, Common Implementation Strategy for the Water Framework Directive (2000/60/EC) and will include the following items: <ul style="list-style-type: none"> • Identification of existing extraction wells (irrigation, domestic and public use) within the zone of influence • Monitoring of ground water quality and quantity prior to construction period to establish baseline • Periodic monitoring of ground water quality during construction period and operation period. The locations will also include upstream locations of potential impacts to assess how ground water quality is changing with time. • Periodic monitoring of groundwater discharge locations (stream or lake monitoring) and 	Terrestrial Water Environment	During construction and operations	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	
330	C	OHS Management System	To minimise the negative impacts caused from chemical hazards on labour, following mitigation measures will be complied with: <ul style="list-style-type: none"> • Properly maintained construction machinery, equipment and vehicles will be used to minimize air emissions. • Engine idling time will be reduced in construction sites. • Direct diesel exhaust will be properly removed to minimize exposure of the operators. • Indoor working areas where vehicles or engines are operated will be ventilated or the exhaust gases will be properly diverted. • Lead-containing paint will be avoided and appropriate respiratory protection will be used when cutting galvanized steel. • At work sites where dust levels are excessive, dust masks will be used by relevant personnel. 	Labour and Working Conditions	During construction	ESIA	Vol III. Ch. 3.3 Vol II. Ch. 7	Environmental and Social Management Plan	Occupational Health & Safety Plan	Whole Project	
331	C	OHS Management System	To minimise the negative impacts caused from construction traffic, following mitigation measures will be complied with: <ul style="list-style-type: none"> • Safe work zone will be established to separate workers on foot from the traffic; • For the construction works to be conducted at location where traffic exists, safe work zones will be established by taking relevant measures (closure of roads, diversion of traffic, use of protective barriers, cones, warning lights, etc.); • Weather forecasts will be monitored to provide advance warning of extreme weather to drivers and schedule the work accordingly. 	Labour and Working Conditions	During construction	ESIA	Vol III. Ch. 3.3 Vol II. Ch. 7	Environmental and Social Management Plan	Occupational Health & Safety Plan	Whole Project	
332	C	OHS Management System	To minimise the negative impacts caused from physical hazards on labour, following mitigation measures will be complied with: <ul style="list-style-type: none"> • The area around which elevated work is taking place will be barricaded to prevent unauthorized access and working under personnel on elevated structures will be avoided. • Hoisting and lifting equipment will be rated and properly maintained, and operators trained in their use. Elevating platforms will be maintained and operated according to established safety procedures including use of fall protection measures (e.g. railings), equipment movement protocols (e.g. movement only when the lift is in a retracted position), repair by qualified individuals, and installation of locks to avoid unauthorized use by untrained individuals. • Ladders will be used according to pre-established safety procedures for proper placement, climbing, standing, as well as the use of extensions. • When working at height, proper fall protection measures will be implemented. Fixtures will be installed on bridge components. Safety belts with proper thickness and of suitable materials ensuring sufficient strength will be used. Rope safety belts will be replaced before signs of ageing or fraying of fibres become evident. When operating power tools at height, workers will use a second (backup) safety strap. • Personnel exposed to high levels of noise will be required to use personal hearing protection devices/equipment that will be provided by COK A.S. (or subcontractors) at no cost. Where required for specific works, work rotation programs will be implemented to reduce cumulative exposure. • Weather forecasts will be monitored for outdoor work to provide advance warning of extreme weather and schedule the work accordingly. Protective clothing will be used where required. 	Labour and Working Conditions	During construction	ESIA	Vol III. Ch. 3.3 Vol II. Ch. 7	Environmental and Social Management Plan	Occupational Health & Safety Plan	Whole Project	
333	C	Surface and Groundwater Quality	Treated wastewater will be reused where possible (eg for local watering of vegetation, dust control or as fire-fighting reserve) or discharged in accordance with Lender Standards.	Terrestrial Water Environment	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	

334	C, O	Occupational Health and Safety	Turkish occupational health and safety legislation will be complied with In all activities to be carried out under the Project and necessary measures will be taken. The Project will engage with the relevant health and safety authority for any clarifications.	Community Health and Safety	•During construction; •During operations.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, HR & Worker Management Plan, Occupational Health & Safety Plan, Biodiversity Action Plan, Environmental Management Plan	Whole Project	
335	P, O	Underground and above-ground storage tanks design	Underground and aboveground storage tanks for Service Areas and Petrol Stations will be designed and operated in accordance with EN standards. Underground storage tanks (USTs) or aboveground storage tanks (ASTs) will be designed and built according to the recognized industrial standards. Containment measures for gas/petrol stations will be in compliant to the Turkish Standard TSE 12820 for gas/petrol stations and the IFC EHS guideline for retail petroleum networks. Secondary containment systems will be used for USTs and ASTs to prevent the uncontrolled release of fuels.	Geology, Soils and Contaminated Land	• 2 months before the schedule commencement of construction; •During operations.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Occupational Health & Safety Plan	Whole Project	
336	C	Sediment plume	Use of lateral containment in open water disposal will be considered. Use of borrow pits or dikes reduces the spread of sediments and effects on benthic organisms.	Biodiversity and Conservation	During construction.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Environmental Management Plan	Bridge	
337	C	The control and mitigation of construction dust.	Use of localised dampening and activity-specific dampening will be used to reduce localised emissions of dust.	Air and Climatic Factors	During construction	ESIA	Vol III. Ch. 2.5 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	
338	C	Sediment plume	Use of submerged discharges will be considered for hydraulic disposal of dredged material.	Biodiversity and Conservation	During construction.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Environmental Management Plan	Bridge	
339	C	Riparian vegetation impact.	Vegetation clearance works will avoid affecting the riparian vegetation, whenever possible, since it provides areas for spawning and sheltering of many aquatic organisms.	Biodiversity and Conservation	During construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan	KP 110+500, KP 131+000, KP 135+500, KP 141+000, KP 148+000, KP 178+500, KP 196+500 and KP 198+500	
340	C, O	Waste and Wastewater	Waste hierarchy will be applied to avoid, minimise, segregate, re-use, recycle wastes as much as possible during construction and operation. Disposal of waste will be the last resort and this will be in accordance with the waste management regulations.	Resources and Waste	•During construction; •During operations.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	
341	C	Watching Brief (archaeological monitoring).	Watching Brief (archaeological monitoring): In applying archaeological monitoring as a mitigation measure to certain pre-identified areas or the vicinity of identified assets, impacts can be reduced. This is in line with Turkish Law, IFC Performance Standard 8 and the Cultural Heritage Management Plan. Details of watching brief will be outlined in Cultural Heritage Management Plan and the Chance Finds procedure.	Archaeology and Built Heritage	During construction	ESIA	Vol III. Ch. 3.5 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Cultural Heritage Management Plan	Whole Project (onshore).	
342	P, C	Following the international best practice regarding water crossing.	Water crossings will be designed according to international best practice, aiming to reduce minimise the extent of structures in river beds and preserving or re-instating the natural river bed.	Terrestrial Water Environment	• 2 months before the schedule commencement of construction; •During construction	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Environmental Management Plan	Whole Project	
343	C	The control and mitigation of construction dust.	When not in use, work vehicles will be switched off, unless impractical for health and safety reasons (for example maintenance of air conditioning).	Air and Climatic Factors	During construction	ESIA	Vol III. Ch. 2.5 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	
344	C	The control and mitigation of construction dust.	Where ground and earthworks are covered or surface binders are used, the smallest possible area for working should be exposed.	Air and Climatic Factors	During construction	ESIA	Vol III. Ch. 2.5 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	
345	C	Natural materials will be used for bank protection and stabilisation.	Where possible the natural riverbed depth and courses, bottom sediments and flooding plain and regime will be maintained. Natural materials will be used for bank protection and stabilisation (e.g. vegetation fringes and bankside trees instead of concrete or steel reinforcements. New channels will be made sinuous (and not straight) with asymmetrical cross sections. Where technically applicable dredging will be used positively, e.g. for landscaping or habitat creation.	Terrestrial Water Environment	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	HR & Worker Management Plan, Environmental Management Plan, Watercourse Crossing Plan	KM 108+840; KM 115+900; KM 124+802; KM 137+034; KM 147+226; KM 167+748; KM 178+440	
346	C	The control and mitigation of construction dust.	Where possible, the Project will use vehicles that are compliant with recent emission standards (for example, EURO 3 or USEPA Tier 2) and maintained in reasonable working order.	Air and Climatic Factors	During construction	ESIA	Vol III. Ch. 2.5 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	

347	C	Mitigation measures for impacts on utility supply during construction.	Where sites are established close enough, and there is sufficient capacity, services and utilities (ie water supply, wastewater and sanitation services, electricity supply, potable water supply, and solid waste management) will be purchased from local suppliers. Local utility providers will be commissioned to extend transmission lines or water pipes to worksites.	Socio economic	During construction	ESIA	Vol III. Ch. 3.1 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Environmental Management Plan, Supply Chain Management Plan	Whole Project	
348	O	Landscaping.	Where the Motorway passes sensitive landscape receptors, the Project will implement landscape screening, either by lowering the Motorway or adding landscape bunds. Advantage will be taken of the natural topography for noise shielding. It should be noted that lowering may create drainage issues. Bunds may take additional land, or create visual impacts. Cost-Benefit calculations for each approach are site specific.	Community Health and Safety; Noise & vibration	During operations	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	
349	C	Noise reduction from construction transportation.	Where the Project is close to sensitive receptors and villages, the Project will consider construction of a new dedicated access road, rather than using the existing road network.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Transport Control & Site Access Procedure	Near settlements	
350	C	Control vibrations at quarry sites.	Where the Project procures material from quarries and suppliers not in the direct ownership of the Project or a Project-contractor; the Project will undertake to review the operations of this facility (or supplier) to confirm compliance with its permitted activities and related operational conditions (e.g. required control measures).	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Quarries Management Plan	Quarry sites (existing and proposed)	
351	C	The control and mitigation of construction dust.	Where the Project receives complaints or grievances regarding dust-related nuisance and impacts during construction (specifically, Turkish law and IFC EHS Guidelines), the Project will investigate and, if necessary, undertake remedial action to address the complaint.	Air and Climatic Factors	During construction	ESIA	Vol III. Ch. 2.5 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Environmental Management Plan, Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	
352	P	Permitting - water usage	Where the Project requires water from surface water and groundwater sources, permits will be obtained for water allocation from the General Directorate of State Hydraulic Works and the related Regional Directorates of State Hydraulic Works. Such permits will be obtained 2 months before the commencement of construction works. The Project will undertake a formal consultation meeting with these authorities to confirm the scope and requirements of these permits. The water usage will be based following assessment of water availability for groundwater and surface water quantity. It will be ensured that the water requirements will not burden the existing water resources. Site surveys will be conducted to identify groundwater extraction wells and	Geology, Soils and Contaminated Land; Terrestrial Water Environment; Biodiversity and Conservation.	2 months before the schedule commencement of construction.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure, Change Management Plan	Stakeholder Engagement and Grievance Mechanism Procedure, Environmental Management Plan	Whole Project	
353	P, C	Accordance with the decision of the board and board's opinion in case that the Project route passes through protected areas.	Where the Project route passes through aqueducts (and related protected areas) which are defined as protected area by the Directorate of Regional Board of Protection of Cultural Property; the Project will engage with this authority on the final design and will implement any mitigation measures or design changes in accordance with the decision of the board.	Archaeology and Built Heritage	• 2 months before the schedule commencement of construction; • During construction.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure, Change Management Plan	Stakeholder Engagement and Grievance Mechanism Procedure, Cultural Heritage Management Plan	Whole Project	
354	P, C, O	Take into account the State Hydraulic Works Region 11.	Where the Project route passes through flood protection facilities which are under control of the State Hydraulic Works Region 11; the Project will engage with this authority and implement any mitigation measures or design changes in accordance with the authority's approval. The Project will undertake consultation with the State Hydraulic Works Region 11 prior to the finalisation of any designs.	Resources and Waste; The Terrestrial Water Environment; Socio economic	• 2 months before the schedule commencement of construction; • During construction; • During operations.	Turkish EIA	Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure, Change Management Plan	Stakeholder Engagement and Grievance Mechanism Procedure, Environmental Management Plan	Whole Project	
355	P, C, O	Potential resettlement due to noise exceedences.	Where these mitigation measures are not adequate, a voluntary scheme for noise insulation will be considered for major noise impacts at the affected receptors. Resettlement may also be considered either temporarily during construction or permanently, but this would only be considered after all other options had been shown to be inadequate to avoid significant residual impacts.	Noise and Vibration	• 2 months before the schedule commencement of construction; • During construction; • During operations.	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Near settlements	
356	C	The control and mitigation of construction dust.	Where unpaved roads are utilised by work vehicles, Project will ensure that surface binding agents are used. Options include salt for road encrusting and oil-based agents.	Air and Climatic Factors	During construction	ESIA	Vol III. Ch. 2.5 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Transport Control & Site Access Procedure	Whole Project	
357	C, O	Displacement	Windbreaks and noise embankments will be placed around locations where bees may be affected from construction and operation activities. Given that the beekeepers place bee hives in different locations, it is not feasible to describe the areas where this mitigation will be required. Further detail pertaining to this mitigation measure will be developed in the Construction and Operation EMPs.	Displacement of Existing Land, Use, Property and People	• During construction; • During operations.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Environmental Management Plan, Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	

358	C	Surface Water Bodies and Water Infrastructure (Channels)	Work on stream crossings will be carried out, where technically feasible, from the banks above the channel and avoiding direct intervention in the watercourse, unless the existing bank reinforcement needs to be replaced.	Terrestrial Water Environment	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Watercourse Crossing Plan	Whole Project	IFC Strategic Community Investment
359	C	Labour and Health and Safety Risks and Impacts Related to Worker Accommodation	Worker housing compounds will be built and maintained at the construction camp areas during the construction period. These will be designed and operated in accordance with the provisions of IFC PS2 and also the relevant guidelines within the guidance document Workers' Accommodation: Processes and Standards: A Guidance Note by IFC and the EBRD.	Labour and Working Conditions	During construction	ESIA	Vol III. Ch. 3.3 Vol II. Ch. 7	Environmental and Social Management Plan, Employment Policy	HR & Worker Management Plan	Whole Project	
360	C	Visual barriers.	Working areas will be kept as small as practicable. Visual barriers will be implemented if the area is subjected to high visual impacts.	Landscape and Visual	During construction	ESIA	Vol III. Ch. 2.7 Vol II. Ch. 7	Environmental and Social Management Plan	Soil erosion, Reinstatement and Landscape Management Plan, Environmental Management Plan	Whole Project	IFC General EHS Guidelines
361	C	Land Acquisition	Zoning Plans (scaled 1/5.000 and 1/1.000) of the Project area will be prepared in accordance with settlements that are located on the Project route before implementation of the Project. Plans will be designed in accordance with the 'Regulation on Planning in Protection Zones' and the 'Circular Letter on Procedures and Principles of Zoning Plan Proposal on Protection Zones' and will be submitted to the relevant governorship for approval. The Project will undertake consultation with the relevant authorities on this matter prior to the finalisation of the Project design.	Socio Economics; Displacement of Existing Land, Use, Property and People	During construction	Turkish EIA	Vol II. Ch. 7	Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure	Whole Project	IFC General EHS Guidelines
362	C	Construction noise impact assessment.	For village areas which border the construction site up to 30 m, a reduction of at least 3 dB(A) is required to meet the daytime standard (predicted level is 78 dB(A) at 30 m distance). If noisy activities continue during night time, a reduction by 13 dB(A) is necessary at these locations. In order to achieve the higher levels of noise mitigation that would be required if work is carried out at night, localised screening of the site boundary is likely to be required through the use of noise barriers. This type of mitigation could provide reductions of the order of 10-15 dB(A) if required. According to the input data, during the construction phase the noise level will be monitored.	Noise and Vibration	During construction	ESIA	Vol III. Ch. 2.6 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Near settlements	
363	O	Barriers.	For wild fauna species identified as Medium sensitivity, fauna crossing points (i.e. culverts) will be installed by the Project along the motorway. This will increase the permeability of the motorway and will reduce the barrier effect.	Biodiversity and Conservation	During operations.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Transport Control & Site Access Procedure	<ul style="list-style-type: none"> The proximity of the surface water features (KP 110+500, KP 131+000, KP 135+500, KP 141+000, KP 148+000, KP 178+500, and KP 188+500), where the presence of amphibians may be higher. Other identified areas with a more intense presence of fauna has been identified:, KP 108+500, KP 132+500, KP 137+500, KP 143+000, KP 155+000, , KP 195+500 and KP 197+500) 	
364	C	The control and mitigation of construction dust.	The following measures will be undertaken regarding the stockpiling of of construction materials: - Stockpiling of material, for example, rocks, sand and soils will be minimised. - Stockpiles will be enclosed or sheeted as much as possible. - Stockpiles will be located as far away from receptors as possible. - The design of stockpiles will be optimised to retain a low profile with no sharp changes in shape.	Air and Climatic Factors	During construction	ESIA	Vol III. Ch. 2.5 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	IFC General EHS Guidelines (IFC, 2007), IFC EHS Guidelines for Construction Materials Extraction (IFC, 2007).

365	O	Maintenance of the RoW	The Soil Erosion, Reinstatement and Landscape Management Plan to be developed will address integrated vegetation management (IVM) for the maintenance of the ROW to ensure that biological, mechanical and thermal vegetation control measures are used where practical, and avoid the use of chemical herbicides. The Procedure will reflect the EHS guidelines for Environmental, Health, and Safety Guidelines for Toll Roads in full (as well as Turkish regulations). The Procedure will reflect the EHS guidelines for Environmental, Health, and Safety Guidelines for Toll Roads in full (as well as Turkish regulations). The Soil Erosion, Reinstatement and Landscape Management Plan will specify that when using pesticides and herbicides for the maintenance of ROW, potential impacts to soil and groundwater will be minimised by implementing landscaping plans which have to be submitted to KGM for approval. These plans will address pesticide management and the following measures: o Comply with Turkish regulations on pesticide use. If pest infections are detected the competent authority needs to approve respective pesticide/biocide for pest control. Pesticides of WHO Type 1a and 1b will not be used; o Only use registered or approved herbicides, and ensure they are properly labelled; o Select applicable technologies and practices designed to reduce unintentional drift or runoff; o Establish buffer zones or strips along water sources and surface water bodies; and o Store appropriately by following good hazardous materials storage and handling management practices.	Geology, Soils and Contaminated Land	During operation	ESIA	Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Soil Erosion, Reinstatement and Landscape Management Plan, Environmental Management Plan, Control of Substances Hazardous to Health Procedure	Whole Project	IFC General EHS Guidelines, IFC EHS Guidelines for Toll Roads
366	O	Maintenance of the motorway	The quantities of materials used and wastes generated during the Project operation phase will primarily relate to the operation of the service and maintenance areas and the toll plazas, as well as to the maintenance of the road corridor. Solid waste generation during operation and maintenance activities may include road resurfacing waste (e.g. removal of the old road surface material); during operation and maintenance activities may include road resurfacing waste (e.g. removal of the old road surface material); road litter, illegally dumped waste, or general solid waste from rest areas; animal carcasses; vegetation waste from right-of-way maintenance; and sediment and sludge from stormwater drainage system maintenance (including sediment traps and oil/water separation systems). Paint waste may also be generated from road and bridge maintenance (e.g. due to removal of old paint from road stripping and bridges prior to re-painting). COK A.S.. have committed to preparing Environmental Management Plan , which also include handling solid waste generation during operation and maintenance activities as well as spills and leakages of hazardous materials during construction and operation. These procedures will be updated routinely as the level of detail of	Geology, Soils and Contaminated Land	During operation	ESIA	Vol III. Ch. 2.2 Vol II. Ch. 7	Environmental and Social Management Plan	Soil Erosion, Reinstatement and Landscape Management Plan, Environmental Management Plan, Control of Substances Hazardous to Health Procedure	Whole Project	IFC General EHS Guidelines, IFC EHS Guidelines for Toll Roads
367	C, O	Wastewater monitoring program for surface water quality	The monitoring program to be used for the surface water quality will be based on site specific risk assessments as well as specific guidelines for surface water quality standards given in the regulatory framework (Category I = very good; II) as on the General EHS Guidelines, especially with regard to emissions or effluents from road maintenance facilities. The framework for the monitoring program will be as follows: • Wastewater treatment plant outfalls on construction (e.g. construction camps) and operation phases (e.g. retail petroleum sites) based on Turkish permitting and relevant IFC guidelines requirements; • Upgradient and downgradient locations of stream/river crossings testing for low flow and high flow conditions (seasonal) will be tested routinely tested during construction and operation phases These tested locations and frequency will be selected based on the risk assessment of the downgradient receptor sensitivity (e.g. ecological and/or water resources); the upgradient testing locations will represent baseline conditions for surface water quality; • Road drainage outfalls will be tested routinely at locations as well as during repair activities at ecologically sensitive locations as well as upgradient of surface water resources. The testing frequency will be selected based on the flow discharge characteristics and risk assessment of the downgradient receptor sensitivity (e.g. ecological and/or water resources). • Surface water quality testing will include potential contaminants during including oil and grease, metals (e.g. lead, zinc, copper, cadmium, chromium, and nickel), particulate matter and other pollutants released by vehicles on the roadway, in addition to de-icing salts (e.g. sodium chloride and magnesium chloride) and their substitutes, from roads as well nutrients and herbicides used for management of vegetation in the rights-of-way; These will include contaminants of concern to the ecologists (pesticides, sediment load and contaminants) as identified as concerns in the ESIA ecology chapter will also be taken into account. • Assessment of surface water runoff and of flooding conditions after heavy rainfall events for efficiency of water conveyance systems will be implemented	Terrestrial Water Environment	During construction and operation	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	IFC General EHS Guidelines
368	C	Use of groundwater resources	The use of groundwater resources will be subject to DSI approval. DSI will allow the drilling and use of extraction wells in case the ground water supply is adequate. Such approvals are based on the availability of water supply.	Terrestrial Water Environment	During construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	IFC General EHS Guidelines

369	P, C	Optimization of road design for adequate road drainage	An Environmental Management Plan and Watercourse Crossing Plan will be developed to include measures to ensure that the road design is optimized to limit the gradient of the access roads to reduce runoff-induced erosion, and provide adequate road drainage based on road width, surface material, compaction and maintenance. These plans will be integrated into the process for deciding the layout of all construction sites, work and camp areas. COK A.S.will review the implementation of these plans.	Terrestrial Water Environment	During pre-construction and construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan, Watercourse Crossing Plan	Whole Project	IFC General EHS Guidelines
370	P	Hydrogeological investigations be conducted prior to construction to assess the hydrogeological framework within the project area	The Turkish EIA requires that hydrogeological investigations be conducted prior to construction to assess the hydrogeological framework within the project area. Detailed hydrogeological investigation report shall be prepared and shall be submitted to State Hydraulic Works, Directorate of 25th Region before preparation of implementation projects. These investigations will be used to identify the impact of the motorway construction and operation on the groundwater resources. These impacts will include potential decrease in the use of groundwater extraction wells, lowering of groundwater recharge into the underlying water bearing units and closure of potential future areas of groundwater extraction. Project elements will be located to minimize risks to important sources of groundwater (including unofficial community and communal sources and groundwater wells) and to ensure surface waters and water supplies are not impacted. Where impacts cannot be avoided, appropriate technically and financially feasible mitigation measures will be developed, such as new ground water wells and diversions of irrigation channels to maintain the functionality of the systems during construction period.	Terrestrial Water Environment	As soon as possible/2 months before the schedule commencement of construction	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	IFC General EHS Guidelines
371	P, C, O	Road drainage and storm water management practices	Sustainable road drainage and storm water management practices are part of the stormwater design process for culverts and drainage-stream designs will be implemented and maintained in accordance with international guidelines (such as the AASHTO Highway Drainage Guidelines or similar guidelines) to minimize impacts of road drainage on surrounding water resources.(Such practices will include, e.g. measures to slow peak runoff flow (retention basins, rock/riprap), reduce sediment load, detention ponds or basins).	Terrestrial Water Environment	•During pre-construction; •During construction; •During operations.	ESIA	Vol III. Ch. 2.3 Vol II. Ch. 7	Environmental and Social Management Plan	Environmental Management Plan	Whole Project	IFC General EHS Guidelines
372	C	Dredging disposal	The dredging disposal methodology will be agreed with the MOEUP. With respect to dredge disposal, the following measures will be taken as appropriate: •Beneficial reuse of uncontaminated dredged material will be considered (eg as fill material for near-shore construction projects). • Inspection and monitoring of dredging activities to evaluate the effectiveness of impact prevention strategies, and re-adjusted where necessary as required by the MOEUP sediment disposal guidelines.	Marine Physical	During construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Marine Safety for Tower Foundation Procedure	Dardanelles Strait	
373	P	Pre-construction scour surveys along the bridge piers	COK is committed to undertaking pre-construction scour surveys along the bridge piers and depending on the level of risk of program of mitigation measures will be implemented. Potential mitigation measures may include mattresses, rip-rap around the foundation of the footings. Potential bathymetric changes in other parts of the DS will not be assessed.	Marine Physical	During pre-construction	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Marine Safety for Tower Foundation Procedure	Dardanelles Strait	
374	C	Waste during construction activities	Wastes created during the construction activities will be managed under a Environmental Management Plan, to limit the disturbance to fauna as a result of presence of wastes and spills.	Biodiversity and Conservation	During construction.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Environmental Management Plan	Whole Project, where is the case.	IFC General EHS Guidelines
375	C	Waste during construction activities	In the event that a new disposal site is selected and MOEUP does not require an investigation of the seabed conditions/sensitivity, then in any case a screening will be conducted of the site to determine the presence of any sensitive habitats or receptors such as seagrass beds.	Biodiversity and Conservation	During construction.	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan	Biodiversity Action Plan, Environmental Management Plan	Whole Project, where is the case.	IFC General EHS Guidelines
376	C	Awarness traning	Measures will be in place to prevent members of the local community, especially children, from unauthorised entry to Project-related sites/installations, thus prevent or lower the risks of accidents, as well to the COK AS employees and contractors in order to prevent the spread of STDs and other communicable diseases in local communities. Such measures will include, e.g.: • Awareness training about construction site hazards to children/youths in nearby village schools; •training of health workers in disease treatment and the provision of health services for the workers •performing immunisation programmes for workers • Placement of fencing or other barricades around dangerous construction installations with warning signs of the hazards; • Use of professionally trained security guards at construction sites.	Community Health and Safety Labour & working conditions	During construction	ESIA	Vol III. Ch. 3.4 Vol II. Ch. 7	Environmental and SocialManagement Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure, Employment Policy	Emergency Response Plan, Stakeholder Engagement and Grievance Mechanism Procedure, Environmental Management Plan, Community H&S&Security Management Plan, HR&Worker Management Plan	Whole Project	IFC General EHS Guidelines

377	C	Orientation training	The construction contractors will provide orientation training to their workforces that underline the potential risks/impacts that exist with respect to the relations with the local communities, and the appropriate preventive measures.	Community Health and Safety Labour & working conditions	During construction	ESIA	Vol III. Ch. 3.4 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure, Employment Policy	Emergency Response Plan, Stakeholder Engagement and Grievance Mechanism Procedure, Environmental Management Plan, Community H&S&Security Management Plan, HR&Worker Management Plan	Whole Project	IFC General EHS Guidelines
378	P, C, O	SEP updates	The SEP will be regularly updated to reflect the status of the project, past, current and proposed activities, changes in the grievance mechanism etc. Together with the first update, SEP will additionally include local water providers as stakeholders, and ensure that the topic of water is discussed at future engagement meetings.	Ecosystem Services	During pre-construction, construction and operation	ESIA	Vol III. Ch. 2.4 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan	Environmental Management Plan	Whole Project	IFC General EHS Guidelines; Water Products Law, Water Pollution Control Regulation
379	C	Catalogue of archaeological discoveries	A catalogue of archaeological assets discovered during the project and delivered to the museums will be prepared, promoted and published as part of a corporate social responsibility activity.	Archaeology and Built Heritage	During construction	ESIA	Vol III. Ch. 3.5 Vol II. Ch. 7	Environmental and Social Management Plan, Stakeholder Engagement Plan and Grievance Mechanism Procedure	Stakeholder Engagement and Grievance Mechanism Procedure, Cultural Heritage Management Plan	Whole Project	
380	P	Mortgaged value of land/property	Land owners facing difficulties in accessing credits as a result of expropriation information in the title deeds shall address KGM and the Project, through the grievance mechanism. COK will address such grievances through coordination with KGM. During disclosure, KGM informed they can investigate each such claim and issue a paper to support the credit accessing process until the actual expropriation shall be implemented.	Displacement of Existing Land Use, Property and People	During pre-construction	ESIA	Vol II, Ch 7.11.3	Stakeholder Engagement Plan and Grievance Mechanism Procedure, LACRF	Grievance Mechanism Procedure	Whole Project	IFC PS 5
381	P,C	Construction workforce pressure on educational infrastructure	COK A.S. will monitor the number of workers moving with their families. If this is relevant, additional measures will be considered to support municipal infrastructure.	Socio-economic	During pre-construction and construction	ESIA	Vol II, Ch 7.10.3	Stakeholder Engagement Plan and Grievance Mechanism Procedure, Employment Policy	Grievance Mechanism Procedure, KR and Worker Management Plan	Whole Project	

ANNEX D EXAMPLE OF A CHANGE SCREENING MATRIX

Example of a Change Screening Matrix - for potentially significant Changes (subject to revision by COK A.S. and to be integrated as appropriate into the overall Change/NOV procedures of COK A.S. for the Project)

PROJECT: E&S-TOPICS SCREENING MATRIX		
Date of initial Matrix Preparation: DD/month/YEAR		
Reference: (as per COK A.S. nomenclature)		
Name of COK A.S. responsible person: eg E&S Manager XX		
Summary of Proposed Change (Attach details as appropriate):		
<p>INSERT Short-Name of Change/NOV (<i>Example - reconfiguration of Service Area Layout at KM xx</i>) GIVE SHORT DESCRIPTION of proposed Change/NOV: Example: Contractor proposes to</p> <p>...See drawing No.s. (attached)</p>		
Appraisal criterion	Appraisal of Change implication/potential measures to avoid/minimise the impacts	Resulting Significant change* (Y/N)
a) Compliance with Env and Social Standards:		
Environmental issues:		
<ul style="list-style-type: none"> • air and noise • water and soils • biodiversity • landscape 		
Social issues:		
<ul style="list-style-type: none"> • land use and expropriation • community disruption • socio-economic impact 		
b) Compliance with Health and safety aspects		
c) Compliance with Legal and permitting issues		
d) Land-take impacts (see also Social Impacts above)		
e) cultural heritage/archaeology		
f) Other relevant factors		
* material issues eg defined as potential significant E&S impacts that cannot be readily quantified or mitigated and/or have material, scheduling, reputational or other impacts		
Summary and Conclusions by COK A.S. :		
<p>Further Change Review is warranted for this proposed Change? Yes___ No___</p>		

*ANNEX E SUMMARY OF ENVIRONMENTAL MONITORING
REQUIREMENTS*

Table E-1a Wastewater discharges to water bodies – Surface water runoff.

Parameter/ Aspect	Responsibility	Location	Frequency/Timing	Threshold level* (if applicable)	Management Plan detailing Monitoring Requirements	Trigger for Monitoring
<p>Construction Phase:</p> <p>Turkish Regulations on Surface Water Quality (Official Gazette No/Date: 29327/15.04.2017) to include:</p> <ul style="list-style-type: none"> • Dissolved oxygen • pH • TSS/Turbidity • Oil and grease (TPH and PAH) • Coliforms • COD • BOD <p>River crossings testing for low flow and high flow conditions (seasonal) - tested routinely during construction and operation phases</p> <p>Operation Phase:</p> <ul style="list-style-type: none"> • metals (lead, zinc, copper, cadmium, chromium, and nickel) • particulate matter • de-icing salts (e.g. sodium chloride and magnesium chloride) and their substitutes, from roads • nutrients and herbicides used for management of vegetation in the right-of-way • contaminants of ecological concern (pesticides, sediment load and contaminants) as identified as concerns in the ESIA ecology chapter 	EPC Contractor	<p>Upgradient and downgradient locations of stream</p> <p>Upgradient testing will inform of baseline conditions for surface water quality.</p> <p>Downgradient testing locations selected based on risk assessment, pending on receptors sensitivity (e.g. ecological and/or water resources).</p>	The testing frequency will be selected based on the risk assessment of the downgradient receptor sensitivity (e.g. ecological and/or water resources);	<p>Category I = very good and Category II = good based on the latest changes in the Turkish Regulations on Surface Water Quality (Official Gazette No/Date: 29327/15.04.2017).</p> <p>Upgradient Conditions (reference)</p>	Environmental Management Plan	Rainfall events

* Unless not specified otherwise in permits/licenses, whichever of EU, IFC EHS Guidelines and national threshold levels is most stringent, applies.

Table E-1b Wastewater discharges to water bodies-Direct Outfall

Parameter/ Aspect	Responsibility	Location	Frequency/Timing	Threshold level* (if applicable)	Management Plan detailing Monitoring Requirements	Trigger for Monitoring
<p>Based on permitting requirements-Turkish Water Pollution Control Regulations (Official Gazette Date/Number: (31.12.2004/25687):</p> <p>Domestic wastewater treatment plants (Table 21.1 and IFC EHS General Guideline):</p> <ul style="list-style-type: none"> • BOD • COD • TSS • pH • Total nitrogen • Total phosphorus <p>Oil Water Separator in line with vehicle maintenance repairs (Table 18):</p> <ul style="list-style-type: none"> • Oil and grease NH4-N • CN⁻ • Total Chromium • Fish biotesting • pH <p>Batch Plant and related washing activities</p> <ul style="list-style-type: none"> • pH • temperature <p>Operation Phase:</p> <p>Domestic wastewater treatment plants (Table 21.1 and IFC EHS General Guideline):</p> <ul style="list-style-type: none"> • BOD • COD • TSS • pH 	EPC Contractor	<p>Domestic wastewater Treatment Plants, oil water separators at construction Camps and project site areas during construction phase</p> <p>Wastewater generated during concrete batch plant operations and washing of cement trucks</p> <p>Domestic wastewater Treatment Plants, oil water separators at resting and maintenance areas and repair activities during operation phase</p>	Based on permitting requirements	<p>Domestic wastewater treatment plants (Table 21.1 of Turkish Water Pollution Control Regulations and IFC EHS General Guidelines)</p> <p>Oil Water Separator in line with vehicle maintenance repairs (Table 18)</p>	Environmental Management Plan	Discharge from a project site to surface water (e.g. industrial effluent, wastewater from a sewage treatment plant, discharge from an oil interceptor, etc.).

Parameter/ Aspect	Responsibility	Location	Frequency/Timing	Threshold level* (if applicable)	Management Plan detailing Monitoring Requirements	Trigger for Monitoring
<ul style="list-style-type: none"> • Total nitrogen • Total phosphorus <p>Oil Water Separator in line with vehicle maintenance repairs (Table 18):</p> <ul style="list-style-type: none"> • Oil and grease NH4-N • CN⁻ • Total Chromium • Fish biotesting • pH 						

Table E-2 Water use at Project facilities

Parameter/ Aspect	Responsibility	Location	Frequency/Timing	Threshold level* (if applicable)	Management Plan detailing Monitoring Requirements	Trigger for Monitoring
Quantity of water abstracted from groundwater/surface water sources or water supply from utilities providers	EPC Contractor	At each Project facility with water supply from indicated sources	Ongoing, reported monthly	As specified in site permit/license, if applicable	Environmental Management Plan	Abstraction of water from indicated sources or supplied by an utilities service provider
Water quality in case of supply from own source. Parameters as per applicable permits/licenses/regulations and type of use (e.g. potable/sanitary/ industrial)	EPC Contractor	From each own source	Ongoing, reported monthly, unless otherwise specified in any permit/license	*	Environmental Management Plan	Abstraction from own source

* Unless not specified otherwise in permits/licenses, whichever of EU, IFC EHS Guidelines and national threshold levels is most stringent, applies.

Table E-3 Soil

Parameter/ Aspect	Responsibility	Location	Frequency/Timing	Threshold level* (if applicable)	Management Plan detailing Monitoring Requirements	Trigger for Monitoring
Regulation on Soil Pollution Control and Point-Source Contaminated Sites; Official Gazette Date/Number: 08.06.2010/27605 which include: <ul style="list-style-type: none"> Total Petroleum Hydrocarbons (TPH) benzene, toluene, ethyl benzene and xylene (BTEX) polycyclic aromatic hydrocarbons (PAH) heavy metals (As, Cd, Co, Cr, Cu, Hg, Ni, Pb, Sb, V, Zn) 	EPC Contractor	At sites of suspected contaminated land including: <ul style="list-style-type: none"> areas of known or suspected third-party contamination areas where spills/contamination occurred during construction (excluding minor spills, where visual observation confirms complete removal of contaminated soil) 	Before construction works initiation After construction works finalization	Risk-based with consideration of the provisions of the Turkish Regulation on Soil Pollution Control and Point-Source Contaminated Sites; Official Gazette Date/Number: 08.06.2010/27605	Environmental Management Plan	Upon identification of suspected contaminated land on a project site During demobilisation of project sites where spills/contamination occurred during construction

* Unless not specified otherwise in permits/licenses, whichever of EU, IFC EHS Guidelines and national threshold levels is most stringent, applies.

Table E-4 Air emissions from construction equipment

Parameter/ Aspect	Responsibility	Location	Frequency/Timing	Threshold level* (if applicable)	Management Plan detailing Monitoring Requirements	Trigger for Monitoring
Visual inspections of dust generation and dust suppression controls	EPC Contractor	Project sites and impacted third party sites, such as adjacent receptors or along site access routes	Daily or more frequently during high risk, dry and windy conditions.	N/A	Environmental Management Plan	High-risk activities with potential to cause dust nuisance including, but not limited to construction traffic on unsealed access roads, construction sites adjacent to sensitive receptors. Visible wind-blown dust leaving site boundary or dust deposition observed on street furniture or at sensitive receptors. Any complaints received from third parties.
Emissions from stationary/non-stationary sources	EPC Contractor	Project site	Continuously	*	Environmental Management Plan	Visible black smoke from machinery or vehicle exhausts at any point during operation, not including initial start up

* Unless not specified otherwise in permits/licenses, whichever of EU, IFC EHS Guidelines and national threshold levels is most stringent, applies.

Table E-5 Noise emissions and vibration from construction equipment

Parameter/ Aspect	Responsibility	Location	Frequency/Timing	Threshold level* (if applicable)	Management Plan detailing Monitoring Requirements	Trigger for Monitoring
Noise levels monitoring	EPC Contractor	At sensitive receptors (as identified in ESIA and pre-construction surveys)	As necessary, risk-based pending on works performed During planned out of hours works	*	Environmental Management Plan	High-risk activities or out-of-hours activities with potential to cause impact/nuisance to identified sensitive receptors
Vibration monitoring	EPC Contractor	Inside representative occupied properties that are within 100 m of major vibration-generating activities (e.g. driven piling or vibro-compaction)	As necessary, risk-based pending on works performed	1 mm/s	Environmental Management Plan	High-risk activities or out-of-hours works with potential to cause impact/nuisance to identified sensitive receptors

* Unless not specified otherwise in permits/licenses, whichever of EU, IFC EHS Guidelines and national threshold levels is most stringent, applies.

Table E-6 Biodiversity monitoring

Parameter/ Aspect	Responsibility	Location	Frequency/Timing	Threshold level (if applicable)	Management Plan detailing Monitoring Requirements	Trigger for Monitoring
Terrestrial Environment / Ecological Clerk of Works (ECOW)	EPC Contractor - Ecological Clerk of Works	Overall	Before and during construction works	N/A	Biodiversity Action Plan. Monitor that site-based construction activities are delivered in accordance to relevant laws and Project commitments (i.e. compliance with any mitigation measure described in the ESIA).	N/A

Parameter/ Aspect	Responsibility	Location	Frequency/Timing	Threshold level (if applicable)	Management Plan detailing Monitoring Requirements	Trigger for Monitoring
Terrestrial Environment - Alien Species	EPC Contractor	Overall	Before and during construction works	N/A	Biodiversity Action Plan. Monitoring to record alien species populations in the project area of influence and aimed at removing new populations and preventing them from spreading throughout the AoI.	N/A
Terrestrial Environment - <i>Puffinus yelkouan</i> migration	EPC Contractor - Environmental specialist	Bridge location	During migration periods	N/A	Biodiversity Action Plan. Monitoring defined based on initial survey findings on <i>P. yelkouan</i> movements along the Canakkale strait.	Start of migration period of <i>P. yelkouan</i> .
Marine Environment - Marine mammals	EPC Contractor	Piling areas and noise area of influence	During piling activities	Identification of presence within exclusion zone	Biodiversity Action Plan.	N/A
Marine Environment - Noise	EPC Contractor		Before and during piling activities	Noise threshold according to either NOAA/German guidelines (To be defined)	Biodiversity Action Plan; Construction Method Statement.	Should exceedances be detected, piling methodology and/or mitigation measures to be revised.
Marine Environment - <i>Pinna nobilis</i> translocation	EPC Contractor - Environmental specialist	Translocation areas where <i>P. nobilis</i> individuals have been transferred to.	After translocation, during/ after construction works	Percentage of survival of translocated individuals.	Biodiversity Action Plan.	N/A
Marine Environment - Seagrass re-instatement	EPC Contractor - Environmental specialist	Dry dock access channel	After finalization of dry-dock access works	Area of seagrass re-instated, either naturally or artificially	Biodiversity Action Plan.	N/A

Table E-7 Marine environment monitoring

Parameter/ Aspect	Responsibility	Location	Frequency/Timing	Threshold level* (if applicable)	Management Plan detailing Monitoring Requirements	Trigger for Monitoring
<p>Turkish Water Pollution Control Regulations (Official Gazette Date/Number: (31.12.2004/25687) Table 4 General Criteria for Sea Water Quality to include</p> <ul style="list-style-type: none"> • pH • Color • TSS • Dissolved Oxygen • Oil and grease • Phenols • Heavy metals 	EPC Contractor	Vicinity of Construction areas (including dry dock and tower footings) for construction phase and near sea ingress areas from motorway drainage systems for operation phase	Once every six months during construction and operation phases for routine operations. Two samples to be taken prior to construction phase to establish background levels.	Turkish Water Pollution Control Regulations (Official Gazette Date/Number: (31.12.2004/25687) Table 4		Routine operations or spill occurrence from non-routine events

Table E-8 Cultural Heritage monitoring

Parameter/ Aspect	Responsibility	Location	Frequency/Timing	Threshold level* (if applicable)	Management Plan detailing Monitoring Requirements	Trigger for Monitoring
Unknown archaeological sites	EPC Contractor	Whole Project (onshore)	During Construction	N/A	Cultural Heritage CMP. Chance Finds Procedure	Ground disturbance/earthworks