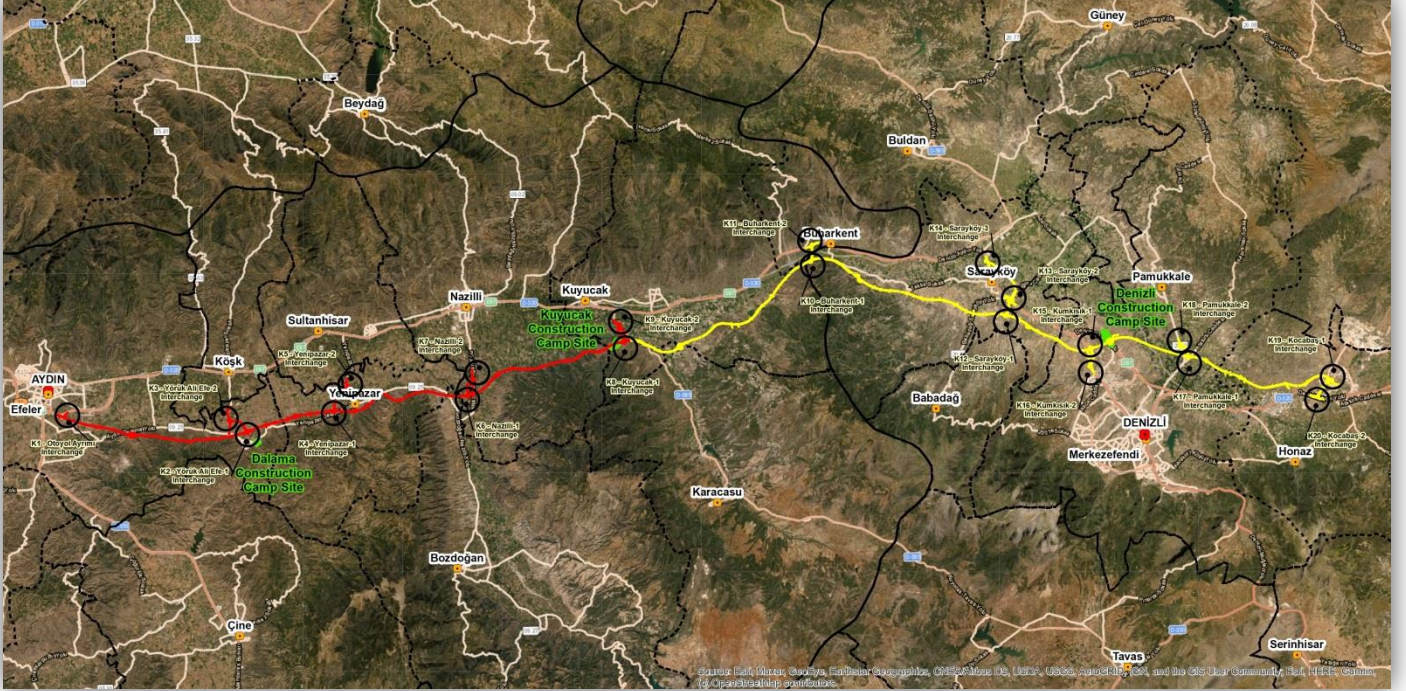


AYDIN-DENİZLİ MOTORWAY PROJECT



ENVIRONMENTAL AND SOCIAL ACTION PLAN

ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT STUDY



ENCON ENVIRONMENTAL CONSULTANCY CO.

APRIL 2022

ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP) FOR THE AYDIN-DENİZLİ MOTORWAY PROJECT

A. Prior to Financial Close

No.	Mitigation Measure/Action	Requirement (Legislative, IFC PSS, Best Practice, Volunteer, Project-level needs)	Resources, Investment Needs	Responsibilities	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
PS 1 Assessment and Management of Environmental and Social Risks and Impacts							
1.1.	Develop Project-specific Environmental and Social Management System (ESMS)	-PS 1	FOIAS's own resources	-FOIAS	Prior to Financial Close	-Written Project-specific Environmental and Social Policy -Written Project-specific Environmental and Social Management Plan (including sub plans/procedures) -Permit/License Register	Done
1.2.	Establish and maintain a competent Organizational Structure	-PS 1	FOIAS's own resources	-FOIAS	Prior to Financial Close	-Organizational structure with defined roles and responsibilities (including subcontractors' relevant departments/personnel)	Done
1.3.	Develop a Project-specific Emergency Preparedness and Response Plan (EPRP)	-PS 1	FOIAS's own resources	-FOIAS	Prior to Financial Close	-Written Project-specific Emergency Preparedness and Response Plan for Construction Phase -Emergency personnel assignments done -Drills conducted -Trainings given for EPRP	Done
1.4.	Prepare Environmental, Health and Safety Risk Assessment	-PS 1	FOIAS's own resources	-FOIAS	Prior to Financial Close	-Written Environmental, Health and Safety Risk Assessment	Done
1.5.	Implement external Grievance Mechanism in line with the SEP Implement Grievance Procedure	-PS 1	FOIAS's own resources	-FOIAS	Prior to Financial Close	-Records on the grievance and comment forms available at locations/platforms (e.g. company web site) in line with the SEP -Grievance logs -Assignment of personnel(s) for the management of grievances -Separate mechanism established for workers' grievances	Done/On going

No.	Mitigation Measure/Action	Requirement (Legislative, IFC PSs, Best Practice, Volunteer, Project-level needs)	Resources, Investment Needs	Responsibilities	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
PS 2 Labor and Working Conditions							
2.1.	Develop a Human Resource Management Procedure under Project's Labor and Employment Policy for construction phase	-PS2	FOIAS's own resources	-FOIAS	Prior to Financial Close	-Written Labor and Employment Policy (under Environmental and Social Policy) and Human Resource Management Procedure	Done
PS 5 Land Acquisition and Involuntary Resettlement							
5.1.	Develop administrative and design measures to minimize impacts on land use/users of the lands	-Legislative -KGM's technical requirements -PS5 -Project-level needs -Volunteer	FOIAS's own resources	-KGM -FOIAS	Prior to Financial Close	-Locations/length of viaducts, culverts, underpasses, overpasses, side access roads, etc. planned to ensure access to lands (agricultural, pasture, etc.)	Done
PS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources							
6.1.	Conduct additional ecological field survey(s) at sensitive habitats identified in the ESIA Report	-PS6 -Project level needs	FOIAS's own resources	-FOIAS -Flora and Fauna Experts	Prior to Financial Close	-Report on the additional Ecology Field Survey conducted by experts	Done
6.2	Finalized design of ecological bridges	-PS6 -Project level needs	FOIAS's own resources	-FOIAS -Fauna Experts	Prior to Financial Close	-Number and locations of the ecological bridges to be constructed	On going

B. Construction Phase

No.	Mitigation Measure/Action	Requirement (Legislative, IFC PSSs, Best Practice, Volunteer, Project-level needs)	Resources, Investment Needs	Responsibilities	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
PS 1 Assessment and Management of Environmental and Social Risks and Impacts							
1.1.	Implement Project-specific Environmental and Social Management System (ESMS)	-PS 1	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Written Project-specific Environmental and Social Policy -Written Project-specific Environmental and Social Management Plan (including sub plans/procedures) -Management System Certificates (ISO 9001, ISO 14001 and OHSAS 18001) obtained by Project Sponsor -Permit/License Register	Done
1.2.	Implement Project-specific Emergency Preparedness and Response Plan (EPRP)	-PS 1	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	- Written Project-specific Emergency Preparedness and Response Plan for Construction Phase -Emergency personnel assignments done -Drills conducted -Trainings given for EPRP	Done
1.3.	Implement Environmental and Social Monitoring Plan	-PS 1	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Assignment of Monitoring Consultant by lenders -Periodic ESMP Performance Review and Monitoring Reports	Done
1.4.	Implement Stakeholder Engagement Plan (SEP)	-PS 1 -PS 5	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Written SEP and regular review -Disclosed ESAP, SEP and NTS -Stakeholder engagement database established -Records on the stakeholder engagement activities/events conducted -Presence/functionality of Project web-site/hotline -No un-assessed complaints about insufficient information disclosure for stakeholders	Done/On going
1.5.	Implement external Grievance Mechanism in line with the SEP Implement Grievance Procedure	-PS 1	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Records on the grievance and comment forms available at locations/platforms (e.g. company web site) in line with the SEP -Grievance logs -Assignment of personnel(s) for the management of grievances -Separate mechanism established for workers' grievances	Done/On going

No.	Mitigation Measure/Action	Requirement (Legislative, IFC PSs, Best Practice, Volunteer, Project-level needs)	Resources, Investment Needs	Responsibilities	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
PS 2 Labor and Working Conditions							
2.1.	Implement Human Resource Management Procedure under Project's Labor and Employment Policy for construction phase	-PS2	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Written Labor and Employment Policy (under Environmental and Social Policy) and Human Resource Management Procedure -Employment data for the Project -Records on stakeholder engagement activities done with the settlement headmen and local associations to inform them about the recruitment process and employment opportunities for the locals, in case needs of worker	Done/On going
2.2.	Implement measures to ensure adequate working conditions during construction phase	-Legislative -PS2 -IFC EHS Guidelines	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Adequate working conditions provided to Project personnel including contracted workers -No un-assessed grievances from Project personnel related with accommodation conditions	Done
2.3.	Implement Occupational Health and Safety Plan during construction phase	-Legislative -PS2 -IFC EHS Guidelines	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Written Project-specific Health and Safety Plan -Written HSE Training Program covering occupation health and safety aspects	Done
2.4.	Implement HSE Training Plan	-PS2	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Written HSE Training Program -Training records	Done/On going
2.5.	Implement Subcontractor Management Plan	-PS2	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Written Subcontractor Management Plan -Training Records -Contracts to include environmental, health, safety and social requirements of FOIAS	Done/On going
2.6.	Implement Protection and Safety Plan	-PS2	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Written Protection and Safety Plan	Done
2.7.	Implement regular checks by site HSE staff in accordance with the checklist on workers accommodation conditions quarterly.	-IFC EHS Guidelines	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Written checklist on workers accommodation conditions to be prepared taking into account relevant IFC Workers Accommodation: Processes and Standards Guidance -Records of regular checks conducted by HSE staff and actions taken	Done/On going
2.8.	Implement maintenance and operational checks of fire safety equipment/systems annually	-Legislative -PS2 -IFC EHS Guidelines	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Records of regular maintenance and checks -Fire drill reports	Done/On going

No.	Mitigation Measure/Action	Requirement (Legislative, IFC PSs, Best Practice, Volunteer, Project-level needs)	Resources, Investment Needs	Responsibilities	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
2.9.	Carry out a third party labor audit (as an ESAP Monitoring Consultant) on an annual basis.	-PS2	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Records regarding labor audit	Done/On going
2.10.	Carry out payroll checks quarterly.	-PS2	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Records regarding labor audit -Payroll checks against issues such as sub-contractor wage rates, payment of benefits and timely payments	Done/On going
2.11	Carry out a third party OHS audit on monthly basis and report to Lenders	-PS2	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Records regarding OHS audit -Monthly reports to Lenders	Done/On going
PS 3 Resource Efficiency and Pollution Prevention							
3.1.	Implement soil management and erosion control measures Implement Soil Management Plan	-Legislative -PS3 -Project-level needs -Volunteer	FOIAS's own resources	-KGM -FOIAS -Subcontractor	2022 Q1	-Soil Management and Erosion Control Procedure to be developed -Top soil management and storage measures taken -Amount of materials to be extracted from quarries/material borrow sites and ratio of excavated materials reused/to be reused	Done/On going
3.2.	Obtain permits from relevant authorities regarding storage sites for excavation soil.	-Legislative	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Permits taken regarding excavation soil storage areas. -Amount of excavation soil to be stored and capacity of designated storage sites.	Done/On going
3.3.	Rehabilitate road construction sites where the construction activities are completed	-Legislative -PS3 -Project-level needs -Volunteer -IFC EHS Guidelines	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Written Rehabilitation Plan for road construction and camp sites -Amount of top soil volumes (m ³) reinstated and reinstation locations	Done/On going
3.4.	Implement Quarry Management Procedure in the scope of the ESMP after the completion of operations at quarries and material borrow sites	-Legislative -PS3 -Project-level needs -Volunteer -IFC EHS Guidelines	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Raw material production/quarry operation licenses obtained -Quarry production and closure plans	Done/On going

No.	Mitigation Measure/Action	Requirement (Legislative, IFC PSs, Best Practice, Volunteer, Project-level needs)	Resources, Investment Needs	Responsibilities	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
3.5.	<p>Implement Solid and Hazardous Waste Management Procedures and waste management measures</p> <p>Implement Waste Management Plan and under this plan implement the following:</p> <ul style="list-style-type: none"> -Procedure for Management of Hazardous Waste and Storage Sites -Procedure for Management of Contaminated Soil -Procedure for Management of Waste Vegetable Oils -Procedure for Management of Recyclable Wastes and Storage Sites -Procedure for Separate Collection and Disposal of Municipal Wastes -Procedure for Management of Medical Wastes -Procedure for Management of Waste Tires -Procedure for Management of Waste Batteries and Accumulators -Procedure for Management of Excavation, Construction and Demolition Wastes 	<ul style="list-style-type: none"> -Legislative -PS3 -IFC EHS Guidelines 	FOIAS's own resources	<ul style="list-style-type: none"> -FOIAS -Subcontractor 	2022 Q1	<ul style="list-style-type: none"> -Temporary Waste Storage Areas (having the required features) established at camp sites -Waste management/disposal agreements done with licensed service providers -Inventory of hazardous materials purchased/used/disposed of -Training and inspection records 	Done/On going
3.6.	<p>Implement Water Quality, Wastewater and Stormwater Management Procedure</p> <p>Implement Water and Wastewater Management Plan</p>	<ul style="list-style-type: none"> -Legislative - PS 3 -IFC EHS Guidelines -KGM's technical requirements 	FOIAS's own resources	<ul style="list-style-type: none"> -FOIAS -Subcontractor 	2022 Q1	<ul style="list-style-type: none"> -Environmental and Social Monitoring Plan applied (for water quality) -Permit for wastewater management and disposal -No un-assessed grievances on the subjects of water quality deterioration and water resources management -Presence and functionality of drainage system -Water supply permits 	Done/On going

No.	Mitigation Measure/Action	Requirement (Legislative, IFC PSs, Best Practice, Volunteer, Project-level needs)	Resources, Investment Needs	Responsibilities	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
3.7.	Implement Air Quality and Emissions Management Procedure and measures to reduce and control air emissions Implement Air Quality Control Plan	-Legislative -PS 3 -IFC EHS Guidelines -KGM's technical req.	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Environmental and Social Monitoring Plan applied (for air quality) -Permits/licenses taken/to be taken for emissions from associated plants and facilities -No un-assessed grievances received in the subjects of air quality deterioration	Done/On going
3.8.	Implement Noise Management Procedure and measures to reduce and control noise generation Implement Noise Control Plan	-PS 1, PS 3 -IFC EHS Guidelines -Legislative -KGM's technical requirements	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Environmental and Social Monitoring Plan applied (for noise) -No un-assessed grievances on the subjects of noise and vibration disturbances	Done/On going
3.9.	Take permits from related institutions prior to initiation of night time activities.	-Legislative	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Permits regarding night time activities.	Done
3.10.	Apply landscaping projects to minimize visual impacts/disturbances along the Motorway route	-PS 3	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Landscaping Plan to be implemented	On going
						-Landscaping activities conducted	On going
PS 4 Community Health, Safety and Security							
4.1.	Implement Community Health and Safety Plan	-Legislative -IFC EHS Guidelines -PS4 -Project-level needs	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Written Community Health and Safety Plan -No un-assessed grievances related with community health and safety	Done/On going
4.2.	Implement Traffic Management Procedure and measures for construction traffic safety Implement Traffic Management Plan	-Legislative -IFC EHS Guidelines -PS4 -Project-level needs	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Written HSE Training Program covering construction traffic safety aspects (e.g. speed limits, specified routes, traffic signs, working hours, etc.) -Accident statistics due to Project-related construction traffic -No un-assessed grievances related with construction traffic/safety	Done

No.	Mitigation Measure/Action	Requirement (Legislative, IFC PSs, Best Practice, Volunteer, Project-level needs)	Resources, Investment Needs	Responsibilities	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
4.3.	Implement measures during blasting operations to ensure community health and safety	-Legislative -IFC EHS Guidelines -PS4 -Project-level needs	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Relevant permits obtained for blasting -Competency/training documents/certificates of experts who will conduct operations related with blasting -Records on blasting measures taken (access restrictions, signing, information, announcements, scheduling, etc.) -No un-assessed grievances related with blasting operations	Done/On going
4.4.	Implement measures against airborne/communicable diseases	-Legislative -IFC EHS Guidelines -PS4	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Written HSE Training Program covering general hygienic rules to be followed by personnel -Presence of medical rooms and competent medical personnel at Camp Sites	On going
4.5.	Implement measures for security personnel arrangements during construction phase	-Legislative -PS4	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Security Plan to be prepared -Permits to be obtained from authorities -Contractual agreements done with relevant contracting companies/employment data on security personnel -No un-assessed grievances regarding the acts security personnel	Done/On going
4.6.	Conduct geological-geotechnical surveys for all sections	-Legislative -PS4	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Geological-Geotechnical Survey Reports	Done/On going
4.7.	Collaborate with local communities on education concerning traffic and pedestrian safety in settlements close to camp sites and where sensitive receptors (such as school) are close to dense traffic.	-IFC EHS Guidelines -Volunteer	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Written activity reports and records of activities	Done/On going
PS 5 Land Acquisition and Involuntary Resettlement							
5.1.	Implement administrative and design measures to minimize impacts on land use/users of the lands	-Legislative -KGM's technical requirements -PS5 -Project-level needs -Volunteer	FOIAS's own resources	-KGM -FOIAS -Subcontractor	2022 Q1	-Locations/length of viaducts, culverts, underpasses, overpasses, side access roads, etc. planned/constructed to ensure access to lands (agricultural, pasture, etc.) -No un-assessed complaints about land access issues	Done

No.	Mitigation Measure/Action	Requirement (Legislative, IFC PSs, Best Practice, Volunteer, Project-level needs)	Resources, Investment Needs	Responsibilities	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
5.2.	Implement measures to avoid any significant disruption to existing infrastructures and distribution of utility services	-Legislative -IFC EHS Guidelines	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Records on the measures taken to restore/maintain/improve affected infrastructure (e.g. roads) relocated/maintained/improved	Done
PS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources							
6.1.	Collect critical flora species identified in the ESIA Report at alternative habitats	-PS6 -Project level needs	FOIAS's own resources	-FOIAS -Subcontractor -Flora Experts	2022 Q1	-Records/reports on collection and planting actions taken	On going
6.2.	Implement measures to minimize impacts on terrestrial fauna species	-PS6 -Project level needs	FOIAS's own resources	-FOIAS -Subcontractor -Fauna Experts	2022 Q1	-Bridges, viaducts and culverts designed/constructed for the needs of terrestrial fauna species	Done
6.3.	Implement Afforestation Plan	-PS6 -Volunteer	FOIAS's own resources	-FOIAS -Subcontractor -Related Ministry	2022 Q1	-Afforestation protocols made with the Ministry of Agriculture and Forestry -As mentioned in the ESIA report and in Afforestation Plan (Annex 4) the number of trees to be removed will be 61,678 while the amount of plantation will be five times of this number. -Monitoring of afforestation activities conducted in line with Afforestation Plan and protocols made	Done
PS 7 Indigenous Peoples							
7.1.	Not Applicable (NA)	NA	NA	NA	NA	NA	NA
PS 8 Cultural Heritage							
8.1.	Comply with the requirements of the Regional Board for Conservation of Cultural Heritage mentioned in their decisions/official views (i.e. additional research, test or salvage excavation) given for the Project in the scope of the Law No: 2863 with regard to the sites to be potentially affected	-Legislative -PS8	FOIAS's own resources	-KGM -FOIAS -Subcontractor	2022 Q1	-Records on avoidance or mitigation measures taken in accordance with the requirements of the authorities and national legislation -Approval letters/permits obtained from related state authorities regarding Project's compliance with national legislation and their specific requirements	Done

No.	Mitigation Measure/Action	Requirement (Legislative, IFC PSs, Best Practice, Volunteer, Project-level needs)	Resources, Investment Needs	Responsibilities	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
8.2.	Implement Chance Find Procedures and conduct archaeological monitoring at critical sites identified within the ESIA Report	-PS8	FOIAS's own resources	-FOIAS -Subcontractor	2022 Q1	-Employment of Project archaeologist/cultural heritage expert throughout the construction phase -Records on sites/cases for which Chance Finds Procedure have been operated -Training records proving all workers are trained regarding Chance Find Procedure. -Regular inspection records ensuring the implementation of the relevant procedures (i.e. Chance Find Procedure).	Done/On going

C. Operation Phase

No.	Mitigation Measure/Action	Requirement (Legislative, IFC PSs, Best Practice, Volunteer, Project-level needs)	Resources, Investment Needs	Responsibilities	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
PS 1 Assessment and Management of Environmental and Social Risks and Impacts							
1.1.	Implement Project-specific Environmental and Social Management System (ESMS)	-PS 1	FOIAS's own resources	-FOIAS	2024 Q4	-Written Project-specific Environmental and Social Policy -Written Project-specific Environmental and Social Management Plan (including sub plans/procedures) -Management System Certificates (ISO 9001, ISO 14001 and OHSAS 18001) obtained by Project sponsor -Permit/License Register	Done/On going
1.2.	Develop and Implement Project-specific Emergency Preparedness and Response Plan (EPRP)	-PS 1	FOIAS's own resources	-FOIAS	2024 Q4	-Written Project-specific Emergency Preparedness and Response Plan for Operation Phase -Emergency personnel assignments done -Trainings given for EPRP	Done/On going
1.3.	Implement Environmental and Social Monitoring Plan	-PS 1	FOIAS's own resources	-FOIAS	2024 Q4	-Assignment of Monitoring Consultant by lenders -Periodic ESMP Performance Review and Monitoring Reports	To be done
1.4.	Implement Stakeholder Engagement Plan (SEP)	-PS 1 -PS 5	FOIAS's own resources	-FOIAS	2024 Q4	-Written SEP and regular review -Disclosed ESIA documents -Stakeholder engagement database established -Records on the stakeholder engagement activities/events conducted -Presence/functionality of Project web-site/hotline -No un-assessed complaints about insufficient information disclosure for stakeholders	Done/On going
1.5.	Implement external Grievance Mechanism in line with the SEP Implement Grievance Procedure	-PS 1	FOIAS's own resources	-FOIAS	2024 Q4	-Records on the grievance and comment forms available at locations/platforms (e.g. company web site) in line with the SEP -Grievance logs -Assignment of personnel(s) for the management of grievances -Separate mechanism established for workers' grievances	Done/On going
PS 2 Labor and Working Conditions							
2.1.	Implement Human Resource Management Procedure under Project's Labor and Employment Policy	-PS2	FOIAS's own resources	-FOIAS	2024 Q4	-Written Labor and Employment Policy (under Environmental and Social Policy) and Human Resource Management Procedure	Done/On going

No.	Mitigation Measure/Action	Requirement (Legislative, IFC PSs, Best Practice, Volunteer, Project-level needs)	Resources, Investment Needs	Responsibilities	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
2.3.	Implement Occupational Health and Safety Plan during operation phase	-Legislative -PS2 -IFC EHS Guidelines	FOIAS's own resources	-FOIAS	2024 Q4	-Written Project-specific Health and Safety Plan -Written HSE Training Program covering occupation health and safety aspects	Done/On going
2.4.	Implement measures to ensure safety during the road maintenance or landscaping works	-Legislative -PS2 -IFC EHS Guidelines	FOIAS's own resources	-FOIAS	2024 Q4	-Written Operation and Maintenance Plans/Procedures covering health and safety aspects for road maintenance and landscaping personnel	To be done
2.5.	Implement maintenance and operational checks of fire safety equipment/systems	-Legislative -PS2 -IFC EHS Guidelines	FOIAS's own resources	-FOIAS	2024 Q4	-Records of regular maintenance and checks	To be done
2.6	Carry out a third party labor audit on an annual basis.	-PS2	FOIAS's own resources	-FOIAS	2024 Q4	-Records regarding labor audit	To be done
2.7.	Carry out payroll checks quarterly.	-PS2	FOIAS's own resources	-FOIAS	2024 Q4	-Records regarding labor audit -Payroll checks against issues such as sub-contractor wage rates, payment of benefits and timely payments	To be done
PS 3 Resource Efficiency and Pollution Prevention							
3.1.	Implement Solid and Hazardous Waste Management Procedures and waste management measures Implement Waste Management Plan and under this plan implement the following: -Procedure for Management of Hazardous Waste and Storage Sites -Procedure for Management of Contaminated Soil -Procedure for Management of Waste Vegetable Oils -Procedure for Management of Recyclable Wastes and Storage Sites -Procedure for Separate Collection and Disposal of Municipal Wastes	-Legislative -PS3 -IFC EHS Guidelines	FOIAS's own resources	-FOIAS	2024 Q4	-Temporary Waste Storage Areas (having the required features) established at camp sites -Waste management/disposal agreements done with licensed service providers -Inventory of hazardous materials purchased/used/disposed of	Done/On going

No.	Mitigation Measure/Action	Requirement (Legislative, IFC PSs, Best Practice, Volunteer, Project-level needs)	Resources, Investment Needs	Responsibilities	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
	-Procedure for Management of Medical Wastes -Procedure for Management of Waste Tires -Procedure for Management of Waste Batteries and Accumulators -Procedure for Management of Excavation, Construction and Demolition Wastes						
3.2.	Implement Water Quality, Wastewater and Stormwater Management Procedure Implement Water and Wastewater Management Plan	-Legislative - PS 3 -IFC EHS Guidelines -KGM's technical requirements	FOIAS's own resources	-FOIAS	2024 Q4	-Environmental and Social Monitoring Plan applied (for water quality) -Permit for wastewater management and disposal -No un-assessed grievances on the subjects of water quality deterioration and water resources management -Presence and functionality of drainage system -Water supply permits	Done/On going
3.3.	Implement Air Quality and Emissions Management Procedure and measures to reduce and control air emissions Implement Air Quality Control Plan	-Legislative -PS 3 -IFC EHS Guidelines -KGM's technical req.	FOIAS's own resources	-FOIAS	2024 Q4	-Environmental and Social Monitoring Plan applied (for air quality) -Permits/licenses taken/to be taken for emissions from associated plants and facilities -No un-assessed grievances received in the subjects of air quality deterioration	Done/On going
3.4.	Implement Noise Management Procedure and measures to reduce and control noise generation Noise measurements will be regularly conducted annually according to IFC standards at critical receptors that will be determined by noise modeling report which will be presented at ESIA. Noise measurements will be conducted at least for 48 hours which represent a week day and a week end during which the traffic load is high. Noise measurement results will be	-PS 1, PS 3 -IFC EHS Guidelines -Legislative -KGM's technical requirements	FOIAS's own resources	-FOIAS	2024 Q4	-Environmental and Social Monitoring Plan applied (for noise) -No un-assessed grievances on the subjects of noise and vibration disturbances	Done/On going

No.	Mitigation Measure/Action	Requirement (Legislative, IFC PSs, Best Practice, Volunteer, Project-level needs)	Resources, Investment Needs	Responsibilities	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
	<p>submitted to the environmental consultant and the facility agent in 30 calendar days at the latest.</p> <p>In case that results of annual noise measurements at critical locations approach (2 Dba) to noise limits specified at IFC guidelines, the installation of the noise barriers will begin soon before subsequent noise measurement results and completed in a reasonable time. Timeline for installation of noise barriers may delay as the number of vehicle passes realized and the results of sound measurements are below the predicted values. Nevertheless, annual noise measurement activities at critical locations which will be specified in the ESIA Report will continue. In case the measurements are not conducted, the locations, installation time and the total number of noise barriers determined as per the most up-to-date noise modeling will be valid.</p> <p>Noise modeling studies and the critical receptors that will be determined in the model will be revised based on increase in predicted annual number of vehicle passes, design changes or other mitigation measures applicable at critical locations. Noise modeling will be conducted based on the annual hourly average vehicle passes.</p>						

No.	Mitigation Measure/Action	Requirement (Legislative, IFC PSs, Best Practice, Volunteer, Project-level needs)	Resources, Investment Needs	Responsibilities	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
	Assumed number of vehicle passes together with the revised model will be submitted to the review of environmental consultant and to the approval of facility agent.						
	Implement Noise Control Plan						
3.5.	Apply landscaping projects to minimize visual impacts/disturbances along the Motorway route	-PS 3	FOIAS's own resources	-FOIAS	2024 Q4	-Landscaping Plan to be implemented	To be done
					2024 Q4	-Landscaping activities conducted	To be done
PS 4	Community Health, Safety and Security						
4.1	Implement Community Health and Safety Plan	-Legislative -IFC EHS Guidelines -PS4 -Project-level needs	FOIAS's own resources	-FOIAS	2024 Q4	-Written Community Health and Safety Plan -No un-assessed grievances related with community health and safety	Done/On going
4.2.	Implement measures to ensure structural safety, traffic safety and pedestrian safety during operation	-KGM's technical requirements -PS4	FOIAS's own resources	-FOIAS	2024 Q4	-Written Operation and Maintenance Plans/Procedures covering health and safety aspects for community -Accident statistics during operation -No un-assessed grievances related with the locations of passage structures (culverts, underpasses, overpasses, etc.)	To be done
4.3.	Implement measures to avoid geological/geotechnical risks during operation	-KGM's technical req. -Project-level needs -PS4	FOIAS's own resources	-FOIAS	2024 Q4	-Status of structural motion, undermining, maintenance requirements of engineering structures to be identified through site audits by experts	To be done

No.	Mitigation Measure/Action	Requirement (Legislative, IFC PSs, Best Practice, Volunteer, Project-level needs)	Resources, Investment Needs	Responsibilities	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
PS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources							
6.1.	Implement Afforestation Plan	-PS6 -Volunteer	FOIAS's own resources	-FOIAS -Related Ministry	2024 Q4	-Afforestation protocols made with the Ministry of Agriculture and Forestry -As mentioned in the ESIA report and in Afforestation Plan (Annex 4) the number of trees to be removed will be 61,678 while the amount of plantation will be five times of this number. -Monitoring of afforestation activities conducted in line with Afforestation Plan and protocols made	Done/On going
PS 7 Indigenous Peoples							
7.1.	Not Applicable (NA)	NA	NA	NA	NA	NA	NA