



APPENDIX 2

*Environmental and Social
Action Plan*

16 PAGES

Number	Subject	Legal Framework (National, Lenders Requirement, Best Practice)	Action	Responsible Party	Timetable	Monitoring and Completion Indicator
Construction Phase						
1	Environmental and Social Management System (ESMS)	Equator Principle IFC PS1, EBRD PR1, EIB PS 1	Define and implement an Environmental, Social, Health and Safety Management System (ES&HS MS) for construction phase as following; <ul style="list-style-type: none"> • Environmental and social management plan • Waste management plan (including all solid, medical and dangerous wastes) • Emergency preparedness and response plan • Soil management plan • Traffic management plan • Noise and vibration management plan • Air quality management plan • Security plan • Hazardous materials management plan • Occupational health and safety plan • Construction camp management plan (including workers' accommodation) • Worker code of conduct • Human resource management plan (including worker code of conduct) • Employment and procurement management plan (including local employment and procurement) • Subcontractor management plan • Archaeological chance find procedure • Community health and safety management plan • Update of Stakeholder management plan • Grievance Mechanism Plan/Procedure for community and workers • Conduct a third-party audit for life and fire safety plan Appoint a competent HSE Manager/Team for the implementation of the ESHS Management Systems and ESHS Requirements	ATM	Construction phase	Required records and other documentation as per the ES&HS MS, plans and procedures (consents, permits, records of inspection, training, audit and monitoring and similar) HSE Organization Chart Assigned Personnel List for ESHS
2	Site access	Equator Principle IFC PS1, EBRD PR1, EIB PS 1	Stay in contact with local authorities to provide input on any future planning of the road and transportation in line with the developments in the area and maximize the	Service Provider of ATM	Construction phase	Liaison with the authorities



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			benefit from future transportation network developments in the region.			
3	ES&HS MS Compliance	Equator Principle IFC PS1, EBRD PR1, EIB PS1	<ul style="list-style-type: none"> Monthly progress reports to Lenders Regular environmental and social monitoring visits by Lenders. 	ATM Lenders	Construction phase	<ul style="list-style-type: none"> Monthly Progress Reports Lenders Monitoring reports
4	Permitting	Equator Principle IFC PS1, EBRD PR1, National Legislation, EIB PS1	Obtain all required legal permits/consents/approvals required during the construction phase.	ATM	Construction phase	Records of permits/consents/approvals/official correspondences and similar
5	Human Resources	Equator Principle IFC PS2, EBRD PR2, National Legislation, EIB PS8	<ul style="list-style-type: none"> Implement Human Resources Policy and Management Plan Issue contracts to workers upon recruitment Keep personnel data files including contracts, training records, next of kin information and medical surveillance records (if relevant). Keep records of database for employee, worker and subcontractor information such as contracts, identity card number, SSI numbers, age, gender, medical surveillance reports etc. 	ATM	Construction phase	<ul style="list-style-type: none"> Worker contracts Personnel records Employee database
6	OHS	Equator Principle IFC PS2, EBRD PR2, World Bank Group Health and Safety Guidelines (EHS Guidelines), National Legislation, EIB PS 8,9	<ul style="list-style-type: none"> Implement the OHS Plan, prepared in line with national legislation and EBRD/IFC Requirements for construction. Provide required trainings for the workers Ensure compliance with the applicable national OHS legislation for the construction phase Implement the structure for reporting and investigating all accidents and incidents Introduce procedures and mitigation measures as part of the OHS plan to ensure that primary suppliers within the supply chain are taking steps to prevent or to correct life-threatening situations and remedy is not possible shift the project's primary supply chain over time to suppliers that can demonstrate that they are complying with Equator Principle PS2, EBRD PR2 and IFC PS2 	ATM	Construction phase	<ul style="list-style-type: none"> Occupational Health and Safety Plan Records of training, audits, inspections, provision of PPE, accidents and incidents Records of corrective actions Records of risk assessments. Records of primary suppliers' performance on OHS

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7	Workers grievance mechanism	Equator Principle IFC PS2, EBRD PR2-PR10, EIB PS 8,9,10	<ul style="list-style-type: none"> Implement the grievance mechanism for the workers; respond to the grievances in a timely manner and take corrective actions if required. Publicize the grievance mechanism for the workers 	ATM	Construction phase	Records of grievances with the respond details and the corrective actions if required
8	Workers accommodation	Equator Principle EBRD PR2, IFC PS2, EIB PS8,9	<ul style="list-style-type: none"> Implement the Construction Camp Management Plan Perform internal and external audits, inspections at intervals in line with the Construction Camp Management Plan and Equator Principle/EBRD Requirements. 	ATM	Construction phase	Audit and inspection records
9	Subcontractors	Equator Principle EBRD PR2, IFC PS2, EIB PS8,9	<ul style="list-style-type: none"> Implement subcontractor management and monitoring plan Prepare approved subcontractors list Ensure the subcontractors are performing in line with the HR Policy and implementing workers' grievance mechanism 	ATM	Construction phase	<ul style="list-style-type: none"> Contracts with subcontractors Approved subcontractors list Records of subcontractor's incidents, accidents, non-compliances Subcontractor personnel files Subcontractor environmental, social, health and safety trainings Records Evidence of how workers are informed on the grievance mechanism Grievance Mechanism
10	Material Supply	Equator Principle EBRD PR2, IFC PS2, Best Practice, EIB PS8,9	<ul style="list-style-type: none"> Prepare and approved supplier list Supply material from suppliers at as close as possible distances. Ensure materials are supplied from permitted/licenced/certified suppliers Prefer as practical as possible the materials certified as green and low carbon 	ATM	Construction phase	<ul style="list-style-type: none"> Approved suppliers list Records of supply and supplier certificates/licences
11	Noise	Equator Principle EBRD PR3, IFC PS3 National Legislation Best Practice EIB PS 2	<ul style="list-style-type: none"> Implement Noise and Vibration Control and Monitoring Plan Limit construction works to the day time. If night work is required obtain the required permits from the relevant local authorities to do so. 	ATM	Construction phase	<ul style="list-style-type: none"> Monthly Noise monitoring reports prepared by a third-party company Records of training provided to the workforce Records of inspections

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			<ul style="list-style-type: none"> Conduct monthly noise measurements (24 hours) during the construction activities at the points included in the ESIA report. Install noise barriers if needed 			
12	Soil, surface water, groundwater	Equator Principle EBRD PR3 IFC PS3 National Legislation Best Practice, EIB PS 2	<ul style="list-style-type: none"> Ensure construction measures are in place for the protection of soil, groundwater and surface water such as storage areas for top soil, spill control and similar. Ensure spill kits are available at site for response to spill. Implement the Waste Management Plan, Emergency Preparedness and Response Plan, Hazardous Material Management Plan for the construction phase Train the workers on the use of spill kits, response to emergency spillages and other requirements of the construction management plans and procedures Groundwater quality measurements once in every 3 months 	ATM	Construction phase	<ul style="list-style-type: none"> Training records Audit and inspection records Presence of spill kits at site Records of emergency cases, spills and similar Measurement results, waste disposal records, contaminated soil disposal records and similar
13	Hazardous Materials Management	Equator Principle, EBRD PR3, PR4, IFC PS3, PS4, National Legislation, Best Practice, EIB PS 2	<ul style="list-style-type: none"> Implement Hazardous Material Management Plan Prepare a hazardous material inventory Ensure MSDS(s) of all materials are available at site, relevant locations such as these materials are stored and used in Turkish Provide required PPE to the relevant personnel handling the hazardous material Ensure there is designated area for the storage of hazardous material and the hazardous materials are stored at such locations Train the workers on handling of the hazardous material 	ATM	Construction phase	<ul style="list-style-type: none"> Training records Presence of MSD(s) at site PPE provision records Records of audits and inspections Hazardous material inventory Incident records
14	Waste Management	Equator Principle, EBRD PR3, IFC PS3, National Legislation, Best Practice, EIB PS2	<ul style="list-style-type: none"> Implement the Waste Management Plan, Emergency Preparedness and Response Plan, Hazardous Materials Management Plan Ensure the construction wastes are stored, transferred, recycled and disposed in accordance with the Waste Management Plan and the national Legislation 	ATM	Construction phase	<ul style="list-style-type: none"> Waste disposal and transfer records Licences of the waste disposal and transfer contractors Declarations to official authorities on the waste management Training records



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			<ul style="list-style-type: none"> Dispose the construction waste at licenced disposal area in accordance with the regulatory waste classification through licenced disposal contractors Transfer the construction waste through licenced contractors and keep all the relevant records on waste transfer Establish a waste storage area at site where the hazardous wastes are stored properly and not mixed with the other types of wastes Perform routine audits and inspection to ensure the above-mentioned management plans are implemented and the above-mentioned measures are in place. Provide training to the workforce on the requirements of the above-mentioned management plans regulatory requirements on waste management and the above-mentioned measures. 			<ul style="list-style-type: none"> Presence of a designated waste area, storage, labelling and recycling of waste as defined by the management plans and legislation Records of audits and inspections on the waste management at site Physical evidence of proper storage of wastes at site Evidence of contracts with the waste disposal and transfer contracts
15	Water and Wastewater	Equator Principle PS3, EBRD PR3 IFC PS3, National Legislation, Best Practice, EIB PS 2	<ul style="list-style-type: none"> Discharge of wastewater to the municipal system with required permissions and protocols with the relevant authorities Monitor the wastewater quality and quantity as required by the protocol and the relevant official authorities. Monitor the water quality and quantity 	ATM	Construction phase	<ul style="list-style-type: none"> Wastewater discharge permit/protocol Monitoring records Correspondences with the relevant authorities
16	Soil	Equator Principle, EBRD PR3, IFC PS3, National Legislation, EIB PS2	<ul style="list-style-type: none"> Soil quality measurements 1 time for NACE 8610 which is the activity of "Hospital Services" based on the Regulation on Soil Pollution Control and Point Source Contaminated Sites Soil quality measurements on an as needed bases when accidental releases or spills occur or are suspected for NACE 4120 and additional parameters based on the nature of the contaminant material. This campaign can be conducted during the construction phase; however, the samples must be taken from the places that would have not been excavated. 	ATM	Construction phase	Analyse results.

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17	Air Quality	Equator Principle, EBRD PR1, PR3, IFC PS1, PS3, National Legislation, EIB PS2	<ul style="list-style-type: none"> Implement Air Quality Monitoring and Management Plan Implement Traffic Management Plan Passive diffusion tubes should be set for a month in the closest 4 sensitive receptors for SOX and NOX measurements to collect information on the existing air quality conditions at these receptors. Monitor PM10 (24 hours duration) monthly Provide training to the workforce and drivers 	ATM	Construction phase	<ul style="list-style-type: none"> Analyses results for the baseline measurements Results of monitoring by a third party Records of inspections and trainings provided to workers and drivers Maintenance Records of equipment and vehicles
18	Archaeological Chance Finds	Equator Principle, EBRD PR8, IFC PS8, National Legislation EIB PS	<ul style="list-style-type: none"> Implement an Archaeological Chance Find Procedure Contact the relevant authorities in case of a chance find 	ATM	Construction phase	<ul style="list-style-type: none"> Records of training provided to the workforce Records of chance find and associated correspondences with the authorities
19	Community health and safety	Equator Principle, EBRD PR4, IFC PS4, National Legislation, IFC EHS Guidelines, EIB PS9	<ul style="list-style-type: none"> Implement Community Health and Safety measures for construction Implement Emergency Preparedness and Response measures for construction Implement Traffic Management Plan Implement traffic safety measures for the residents Ensure measures are in place for the control of air and noise emissions as defined in the management plans, and in this ESAP. Ensure the Emergency Preparedness and Response Plan is disclosed to the relevant authorities and community members Inform community members and authorities in case of a revision in Emergency Preparedness and Response Plan (EPRP) Perform emergency drills as required by the legislation and the EPRP Provide training to the workforce on the requirements of the abovementioned management plans 	ATM	Construction phase	<ul style="list-style-type: none"> Training records Emergency drill records Correspondences with the local authorities and community members on EPRP Evidence of disclosure of the EPRP to the community members and the local authorities Physical presence of traffic signs at appropriate locations and required numbers
20	Security	Equator Principle, EBRD PS4, IFC PS4	<ul style="list-style-type: none"> Implement the security plan 	ATM	Construction phase	Records of credentials of the security personnel

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		National Legislation, Best Practice, EIB PS 9	<ul style="list-style-type: none"> Ensure adequate number of competent security personnel without previous records of abuses 			<ul style="list-style-type: none"> Records of training provided to security personnel Records of audits and inspection
21	SEP	Equator Principle, EBRD PR10, IFC PS1, EIB PS 10	<ul style="list-style-type: none"> Update and disclose the SEP for construction works Disclose the Grievance Mechanism to the public including the details on how to contact the responsible personnel for handling grievances Keep records for all grievances and disclosures Ensure the grievances are responded in a timely manner and take corrective actions if required Keep records of public consultation and information disclosure Disclose the ESIA, ESAP, SEP to the public and ensure it is in the public domain throughout the lifetime of the Project Report annually to Lenders on the implementation of the management plans and any new risk/impact identified to the public. 	ATM	Construction phase	<ul style="list-style-type: none"> Updated SEP and Grievance Mechanism documentation Records of grievances and information disclosures Disclosure through public domain Evidences on information disclosure through Headmen Annual reports to Lenders
Prior to Operation and Operational Phase						
1	Permits	Equator Principle, EBRD PR1, IFC PS1 National Legislation	<ul style="list-style-type: none"> Get all approvals for the start of the operation of the Hospital and during operation phase Ensure that EIA permit process will be in place if trigeneration plant is to be installed Take all permits in relation to the operation of a future trigeneration plant 	Service Provider of ATM	Prior to/during Operational phase	<ul style="list-style-type: none"> Official correspondences with relevant authorities Records of permits Records of measurements and monitoring required as per these permits
2	ESMS	Equator Principle, EBRD PR1/PR2/PR3/PR4 IFC PS1/PS2/PS3/PS4 Best Practice EIB PS 1/2/4/9	<ul style="list-style-type: none"> Preparation of an ES&HS MS (including environmental, health, safety and social aspects) Develop and implement an ESMS in line with international guidelines (such as ISO 9001:2015, ISO 14001:2015, OHSAS 18001, ISO 50001:2011) Consider required consultation with MoH during improvement of the ESMS 	Service Provider of ATM	Operational phase	<ul style="list-style-type: none"> ESMS, Management Plans, Procedures,



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			<ul style="list-style-type: none"> • Update the mitigation measures in accordance with the EBRD Environmental and Social Standards, Equator Principle EHS Guidelines and IFC Environmental, Health and Safety Guidelines for Health Care Facilities in relation to wastewater, waste, air, noise and vibration, medical and radioactive waste and hazardous waste. • Establish and maintain an organizational structure with personnel having knowledge, skills, and experience necessary to manage the ESMS and Project ESHS issues in cooperation with MoH • Appoint a qualified Environmental and Social Manager/Team • Train the designated personnel for environmental and social issues and implementation of below mentioned plans. • As part of the ESMS, specific plans and procedures would be produced and implemented to address the ESHS risks of the Project. These will include as a minimum the following; <ul style="list-style-type: none"> • Waste Management Plan (including medical, hazardous, recyclable and domestic wastes) • Emergency preparedness and response plan • Hazardous Material Management Plan • Traffic management plan • Air quality management plan • Security plan • Occupational health and safety plan • Human Resources management plan/procedure/personnel procedure • Employment and procurement management plan • Subcontractor and Service Provider Management and Monitoring Plan • Community health and safety management plan • Infection control plan 			

Number	Subject	Legal Framework (National, Lenders Requirement, Best Practice)	Action	Responsible Party	Timetable	Monitoring and Completion Indicator
			<ul style="list-style-type: none"> Radioactive management plan (including control and management of exposure and substance) Life and Fire Safety Master Plan 			
3	Hospital commissioning	IFC PSs, EBR PRs Equator Principles, National Legislation, EIB PSs	Perform all required commissioning tests	Service Provider of ATM	Prior to operation	Records of the commissioning tests
4	Auditing	Equator Principle Self-Assessment Guide for Medical Facilities	<ul style="list-style-type: none"> Perform environmental and social hospital audit in accordance with EBRD Equator Principle guidelines by third party auditor Close the corrective actions in the audit report Third party hospital audit to be performed every 3 years after the 1st audit and submission of the audit report to the Lenders 	Service Provider of ATM	1.5 year following start of operation	<ul style="list-style-type: none"> 1st third party audit report Remedial measures report Regular third party audit reports every 3 years following the 1st audit
5	Fire and life safety	EBRD PR4, IFC PS4, Best practice, Regulation on the Protection of Buildings from Fire, EIB PS 8/9	<ul style="list-style-type: none"> Develop and implement a Life and Fire Safety Master Plan including operation of IHC in accordance with the local legislation and close the gaps of the local legislation by implementing the international requirements (i.e. NFPA 72) Maintenance of all fire safety systems periodically (including ventilation ducts with fire safety flaps) and control of escape routes (i.e. self-closing doors, warning signals and lights) 	Service Provider of ATM	Prior to operation	<ul style="list-style-type: none"> Life and Fire Safety Master Plan Inspection and Drill records
6	OHS	Equator Principle, EBRD PR2, IFC PS2 World Bank Group Health and Safety Guidelines for Health Care Facilities National Legislation EIB PS 8/9	<ul style="list-style-type: none"> Develop and implement OHS Management Plan and Procedure (including risk assessment and identification of appropriate mitigation measures) in line with national legislation and Equator Principle and EBRD PR2. Train all employees/workers and subcontractors Provide first aid training to relevant number of employees/workers in compliance with local legislation Assign an OHS Manager Record all accidents/incidents 	Service Provider of ATM	Prior to operation	<ul style="list-style-type: none"> OHS Management Plan and Procedure Review of organizational structure Training records Records of accidents and incidents Records of corrective actions

Number	Subject	Legal Framework (National, Lenders Requirement, Best Practice	Action	Responsible Party	Timetable	Monitoring and Completion Indicator
			<ul style="list-style-type: none"> • Provide free personnel protective equipment to the employees/workers • Provide free medical examinations to the employees/workers as per the legal requirements • OHS Management Plan and Procedure to ensure that all subcontractors and supplier comply with Equator Principle /EBRD PR2. • Ensure compliance with applicable health and safety legislation for the operation of the IHC • Introduce procedures and mitigation measures as part of the OHS plan to ensure that primary suppliers within the supply chain are taking steps to prevent or to correct life-threatening situations and remedy is not possible shift the project's primary supply chain over time to suppliers that can demonstrate that they are complying with Equator Principle and EBRD PR2 			
7	Human Resources & Labour	Equator Principle, EBRD PR2, IFC PS2 ILO Conventions (signed by Turkey), World Bank Group Health and Safety Guidelines (EHS Guidelines) EIB PS 8/9	<ul style="list-style-type: none"> • Develop and implement HR policy in line with IFC PS2 and EBRD PR2 • Inform all the employees/workers on HR • Develop and HR Management Plan in line with IFC PS2 and EBRD PR2 • Ensure employee contracts are in place and include the working conditions, job descriptions, terms of employment and EHS responsibilities • Establish communication and coordination procedures among the employees of Service Provider of ATM and the employees of MOH • Keep personnel data files including contracts, training records, next of keen information and medical surveillance records (if relevant). • Keep records of training • Ensure all employees are under Social Security Institution (SSI) 	Service Provider of ATM	Prior to/ during Operation phase	<ul style="list-style-type: none"> • HR Policy / HR Management Plan • Training records • Records on disclosing the HR Policy to the employees • Records/database of employees/workers' information/records • Employee contracts

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			<ul style="list-style-type: none"> Keep records of database for employee, worker and subcontractor information such as contracts, identity card number, SSI numbers, age, gender, medical surveillance reports etc. Develop communication-coordination procedures between the employees/workers of ATM under the responsibility of MoH 			
8	Procurement	Equator Principle EBRD PR1/PR2 IFC PS2, EIB PS 8	Implement a sustainable and transparent procurement policy	Service Provider of ATM	Prior to operation	Procurement policy
9	Grievance mechanism (employees/workers)	Equator Principle, EBRD PR2, IFC PS2, EIB PS 8	<ul style="list-style-type: none"> Develop and implement a Grievance Mechanism for employees/workers Ensure that all employee is aware of the grievance mechanism and provide easy access for employee to the grievance mechanism Respond to the grievances in a timely manner Undertake necessary corrective actions if needed 	Service Provider of ATM	Prior to/during Operation phase	<ul style="list-style-type: none"> Established Grievance Mechanisms (employees/workers) Records of documents that how staff are informed on grievance mechanism Records of grievances and response to the grievances and corrective actions
10	Grievance mechanism (patient's)	Equator Principle, EBRD PR10, IFC PS1, EIB PS10	Develop and implement a Grievance Mechanism for patient's in coordination with MoH	Service Provider of ATM	During Operation phase	<ul style="list-style-type: none"> Established Grievance Mechanisms (patient's) Records of grievances including the Responses and corrective actions if any.
11	Subcontractors	Equator Principle, EBRD PR1/PR2 IFC PS2, EIB PS 1/8	<ul style="list-style-type: none"> Develop and implement Subcontractor Management and Monitoring Plan in compliance with Projects ESMP, ESAP, HR Management Plan, OHS Management Plan and other project specific plans. Prepare an approved subcontractor list Require subcontractors to manage their employees/workers in compliance with Project's HR requirements and to establish grievance mechanism for them Require subcontractors to comply with Project's OHS Policies 	Service Provider of ATM	Prior to / during Operation Phase	<ul style="list-style-type: none"> Subcontractor Management and Monitoring Plan Contracts with subcontractors Approved subcontractor list Subcontractor personnel files Records of subcontractor grievance mechanism information Records of subcontractor's accidents, incidents and non-compliances Records on how the subcontractor employees are informed on the grievance mechanism

Number	Subject	Legal Framework (National, Lenders Requirement, Best Practice)	Action	Responsible Party	Timetable	Monitoring and Completion Indicator
			<ul style="list-style-type: none"> Require subcontractors to report accidents, incidents and safety non-compliances through contractual agreements. 			
12	Supply of materials	Equator Principle, EBRD PR2, IFC PS2, EIB PS 8 Best Practice	<ul style="list-style-type: none"> Supply material from suppliers at as close as possible distances. Ensure materials are supplied from permitted/licenced/certified suppliers Prefer as practical as possible the materials certified as green and low carbon Prepare an approved supplier list 	Service Provider of ATM	During operation	<ul style="list-style-type: none"> Approved supplier list Licenses/certificates/permits of the suppliers
13	Infection	Equator Principle, EBRD PR2/PR4, IFC PS2/PS4, EIB PS 8/9	<ul style="list-style-type: none"> Develop and implement an Infection Control Plan (including blood borne pathogens) for hospital and inform employees/workers/visitors on infection control policies Establish an Infection Control Committee 	Service Provider of ATM	Prior to/during operation phase	<ul style="list-style-type: none"> Infection Control Plan Records of documents regarding implementation of the plane Records on the establishment and meetings of the Infection Control Committee
14	Health Care Waste Management System (HWMS)	Equator Principle World Bank Group Health and Safety Guidelines (EHS Guidelines) National Legislation IFC PS3, EBRD PR3, EIB PS 2	<ul style="list-style-type: none"> Develop and implement a HWMS in accordance with Equator Principle /EBRD Requirements. Consult and coordinate with MoH during improvement of HWMS Manage (collect, handling, transport, disposal etc.) all wastes in compliance with legislations Record keeping about waste generation, storage and transportation to the third-party waste management facilities Implement a detailed hospital audit in terms of resource consumption, energy use and waste generation and other requirements of the Guidelines. Perform periodic inspections in the waste recycling/disposal facilities to ensure proper disposal practices are implemented Train relevant employees/workers Obtain a confirmation letter from the Municipality for the disposal of solid waste 	Service Provider of ATM	Operation phase	<ul style="list-style-type: none"> Records of healthcare waste management activities (i.e. storage, transport and disposal) Correspondences with TAEK Records of audits related to the implementation of the Waste Management Plan Consents/permits from local authorities for the disposal of wastes Licenses of transportation companies and disposal facilities Declaration records made to the MEUP Periodical site inspections to ensure that site conditions/applications are adequate for appropriate waste management Training records of employees/workers Correspondence with the authorities Permit for disposal of medical waste

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			<ul style="list-style-type: none"> Obtain an agreement documents for the licenced firm to dispose of the medical waste Inform TAEK on the radioactive waste generation Coordinate and consult with TAEK on the management of the radioactive wastes. 			
15	Medical Waste	Equator Principle, EBRD PR3, IFC PS3, EIB PS2, National legislation, Best practice	Ensure an agreement documents with the licenced firm to dispose of the medical waste prior operation period are in place	Service Provider of ATM	Prior to construction permit/operation phase	<ul style="list-style-type: none"> Correspondence with the authorities Permit for disposal of medical waste
16	Pollution prevention	Equator Principle, EBRD PR3, IFC PS3, EIB PS2 National legislation and best practice	<ul style="list-style-type: none"> Inspect/control regularly the hazardous material storage equipment (i.e. underground storage tanks and lines) Ensure operation practices are in place for the protection of the soil, surface water and groundwater (i.e. storage areas, spillage control, spill kits) Provide spill response kits at appropriate locations Provide specific instructions and train appointed employees/workers on the use of the spill kits Develop and implement of following plans: <ul style="list-style-type: none"> Waste Management Plan Hazardous Materials Management Plan Emergency Preparedness and Response Plan (including response to spills from hazardous materials) Provide training to employees/subcontractor employees on above mentioned plans 	Service Provider of ATM	During operation phase	<ul style="list-style-type: none"> Records of inspections on the storage equipment for hazardous material Presence of spill response kits Records of monitoring of the implementation of the relevant plans Records of any spillage, measurement results, contaminated soil disposal records, training records
17	Radioactive materials/waste	Equator Principle, EBRD PR1/PR3, IFC PS1/PS3 National legislation and best practice EIB PS 1/2	<ul style="list-style-type: none"> Manage the radioactive substances in accordance with the Equator Principle Environmental Health and Safety Guideline for Health Care Facilities Develop a Radioactive Management Plan Inform TAEK on the radioactive waste generation Coordinate and consult with TAEK on the management of the radioactive wastes. Train relevant employees/workers 	Service Provider of ATM	Prior to/during Operation phase	Radioactive Management Plan Training records of employees/workers Correspondences with TAEK

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18	Hazardous Materials	Equator Principle, EBRD PR3/PR4, IFC PS3/PS4 EIB PS2/PS 8 National legislation and best practice	<ul style="list-style-type: none"> Develop and implement Hazardous Materials Management Plan, including: <ul style="list-style-type: none"> Prepare an inventory of hazardous materials Obtain Material Safety Data Sheets (MSDSs) and provide them to employees and at appropriate locations in both Turkish and English Provide PPE available for relevant personnel Train relevant personnel Take required onsite measures that are defined in Management Plan Keep hazardous materials in designated areas Provide suitable firefighting equipment close to hazardous material storage/usage areas 	Service Provider of ATM	Operation Phase	<ul style="list-style-type: none"> Records of audits Hazardous material inventory Presence of MSDS(s) Site inspections <ul style="list-style-type: none"> Incident records Training records
19	Wastewater	Equator Principle EBRD PR3, IFC PS3, EIB PS 2, National legislation (Regulation Wastes Generated upon Usage of Radioactive Substances (OG date/no: 02.09.2004/255571))	<ul style="list-style-type: none"> Obtain a permit from the Municipality for the disposal of wastewater Conduct effluent analysis based on the monitoring frequency and proposed limits provided by the Water and Sewage Administration as per the discharge permit Collect urine, feces, blood and vomit from patients treated with geno-toxic drugs separately to avoid their entry into the wastewater stream Undertake necessary measures for liquid wastes contaminated with radioactive substances as per the National Legislation related to discharging this type of wastewater into the sewer system Ensure discharge of chemicals used in the laboratories and the effluents from laboratory equipment does not occur to sewer system and these are transferred to barrels via special collection systems that do not need manpower 	Service Provider of ATM	During Operation phase	<ul style="list-style-type: none"> Correspondence with the authorities Wastewater discharge permit Effluent analysis results to ensure they meet discharge criteria Audits and inspections on collection of the separate collection of urine, feces, blood and vomit from patients treated with geno-toxic drugs to avoid their entry into the wastewater stream
20	Air Quality	Equator Principle EBRD PR3, IFC PS3 National Legislation EIB PS 2	<ul style="list-style-type: none"> Develop and implement Air Quality Management Plan and Traffic Management Plan 	Service Provider of ATM	During Operation phase	<ul style="list-style-type: none"> Records of audits regarding Air Quality Management Plan and Traffic Management Plan

Number	Subject	Legal Framework (National, Lenders Requirement, Best Practice)	Action	Responsible Party	Timetable	Monitoring and Completion Indicator
			<ul style="list-style-type: none"> • Ensure that EIA permit process will be in place if trigeneration plant is to be installed • Take all permits in relation to the operation of a future trigeneration plant • Monitoring of future trigeneration system emissions in compliance with legislations/lender requirements if trigeneration system is installed • Monitor direct and indirect a greenhouse gas (“GHG”) emissions annually during the operation of the Hospital 			<ul style="list-style-type: none"> • Air quality monitoring reports (requirements if trigeneration system is installed) • GHG Measurement Reports
21	Community health and safety	Equator Principle EBRD PR4, IFC PS4, EIB PS 9	<ul style="list-style-type: none"> • Develop and implement Community Health and Safety Management Plan, Emergency Plan, Traffic Management Plan and Security Plan • Update local authorities and communities if there are changes in EPRP • Undertake regular drills/exercises of emergency measures • Train employees/workers • Document discussion of any identified impact, risk and mitigation measures with communities during operation and at least annually. 	Service Provider of ATM	During Operation phase	<ul style="list-style-type: none"> • Community Health and Safety Management Plan, Emergency Plan, Traffic Management Plan and Security Plan • Initiate discussion with MoH and Gendarme as how to address security issues • Records of audits and regular inspections • Training records • Evidence of disclosure and updates • Records of drills • Records of meetings
22	Security	Equator Principle EBRD PR4, IFC PS4, EIB PS9	<ul style="list-style-type: none"> • Develop and implement Security Plan • Employ adequate, trained security staff who have not been involved in past abuses • Inform the human rights and Project’s grievance mechanism 	Service Provider of ATM	Prior to operation/during operation phase	<ul style="list-style-type: none"> • Records of employee’s information • Training records of security staff
23	Information Disclosure/Stakeholder Engagement/Community Grievances	Equator Principle, IFC PS1, EBRD PR10, EIB PS 10	<ul style="list-style-type: none"> • Update of SEP for operational phase • Publicize SEP and Grievance Mechanism including information on contact details of responsible staff to handle grievances • Develop and implement Grievance Mechanism • Respond to grievances in a timely manner and take corrective actions if needed 	Service Provider of ATM	Prior to operation/during operation phase	<ul style="list-style-type: none"> • Updated and disclosed SEP and Grievance Mechanism • Grievance log including records of grievances, response to grievances and corrective actions • Minutes of meetings • Annual reports



Number	Subject	Legal Framework (National, Lenders Requirement, Best Practice)	Action	Responsible Party	Timetable	Monitoring and Completion Indicator
			<ul style="list-style-type: none"> • Keep documented records of consultation and information disclosure • Annual reporting to Lenders on the implementation of the ESMP and any new impacts/risks identified to public 			