



***FRAPORT TAV
ANTALYA TERMINAL MANAGEMENT C.O.***



**AIR QUALITY AND GREENHOUSE GAS
MANAGEMENT PLAN – OPERATION
ENGLISH VERSION**

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1. PURPOSE

This Operation Air Quality Management Plan (AQMP) has been developed as part of the Antalya Airport Expansion Project. The Project involves the expansion of Antalya Airport as part of a multi-phased work program to accommodate future passenger traffic and aircraft movements. FTA was awarded the tender for the operation of Antalya Airport ("AYT") for 25 years from 2027 to 2051. The Joint Venture will increase the capacity of AYT and obtain a new concession for its operation.

The financing for Phase I of these planned works is provided by the "Lenders". The existing passenger terminals and related facilities are operated under a concession until January 1, 2027, by Fraport TAV Antalya Terminal İşletmeciliği A.Ş. (FTA) as the Project Sponsor. The part of FTA that focuses on terminal operations is referred to as "FTA1".

Another part of FTA is organizationally separate from FTA1 and is responsible for financing and construction works for FTA - this organization is referred to as FTA2. Following the completion of the ongoing construction works for the expansion of Terminal 2 (T2) and the Domestic Terminal by FTA2 in early 2025, the terminals will be operated by FTA1 until early 2027. After January 1, 2027, FTA1 and FTA2 will merge and operate the terminals.

The purpose of the AQMP is to set out the approach to the monitoring and reporting of air quality and greenhouse gas (GHG) emissions in ordinance with national and international requirements.

2. SCOPE

The FTA's Project Management Office (PMO)(FTA2) appoints and supervises an Engineering, Procurement and Construction (EPC) Contractor to deliver these construction works on behalf of the airport owner, The Turkish General Directorate of State Airports Authority ("DHMI" - Devlet Hava Meydanlar İşletmesi Genel Müdürlüğü in Turkish). Once the Project has been completed, FTA2 will merge with FTA1 and retain responsibility for the management of passenger-focused assets.

Any aspects that are not controlled by FTA during the operational phase will be handed over to DHMI as part of their operational obligations. DHMI's responsibilities include the management of airside operations including meeting measures to reduce the airports emissions of pollutants associated with combustion such as NO₂, PM₁₀ and CO. Airside activities and future measures are discussed in Section 6.6 and Section 7.5.2 respectively with key performance indicators discussed in Section 7.5.3.

The AQMP covers the operation of the airport but does not cover monitoring associated with landing and take-off movements. Under this AQMP, in addition to the current FTA operations, the FTA's operational responsibilities are considered to be:

Terminal Buildings:

- Operation of T2 International Terminal Building and T4 Domestic Terminal building (this would be a new terminal to the south of existing domestic terminal) including baggage handling facilities (both arrivals and departures systems), passenger boarding bridge (PBB), FTA offices, security check points, security, and IT systems.
- Operation of CIP and VIP Terminal buildings.

Car parks:

- Operation of multi-storey car park (east of existing domestic terminal). This will include a helicopter landing pad on the roof.

Operation of flat car parks.

Energy Centre:

- Operation of existing trigeneration system, emergency generators, existing boilers, chillers, and cold/hot water supplies; and new heat generation and power distribution buildings and facilities (including a new heat generating building for new terminal hot/cold water, new power distribution capacity, and additional diesel-powered emergency generators)

Wastewater Treatment Plants:

- Operation of the main Wastewater Treatment Plant (WWTP) facilities with increased capacity of 7500m³ from 4500m³ (after expansion)
- Operation of the new blue water WWTP to the north of the existing T1 (120m³ capacity)
- Operation of the new southern apron WWTP (200m³ capacity)

Landside Areas:

- Landside lighting
- Landscaping, and
- Operation of the expanded Solid Waste Storage and Separation Facility.

Miscellaneous Facilities:

- Mosque, Police Station, DHMI Headquarter, Catering Area.

This AQMP has been developed in accordance with FTA policies, commitments undertaken by FTA in the IMS, the requirements of the local regulatory framework, EBRD Performance Requirements (especially PR3) and IFC Performance Standards (especially PS3). The AQMP considers the adoption of Good International Practices (GIIP) where no national regulations or international standards/rules are applicable.

The AQMP covers the monitoring and reporting requirements of air quality and GHG emissions separately.

3. ABBREVIATIONS

FTA	Fraport TAV Antalya Terminal Management
AYT	Antalya Airport
AQMP	Air Quality Management Plan
Top Management	General Manager at Fraport TAV
PMO	Project Management Office
EMS	Environmental Management System
IMS	Integrated Management System
GIIP	Good International Practices
EBRD	European Bank for Reconstruction and Development
IFC	International Finance Corporation
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESAP	Environmental and Social Action Plan
PS	Performance Standard
PR	Performance Requirement
EPC	Engineering, Procurement and Construction
RCIAP	Regulation on Control of Industrial Air Pollution
VOC	Volatile Organic Compounds
APU	Auxiliary Power Units
GHG	Greenhouse Gas
SCADA	Supervisory Control And Data Acquisition
GWP	Global Warming Potential
HC	Heating Centre
QM	Quality Department

HR	Human Resources
CLO	Community Liaison Officer
RCAPOI	Regulation on the Control of Air Pollution Originating from Industry
RCIAP	Regulation on the Control of Industrial Air Pollution
EU	European Union
GSE	Ground Service Equipment
PCA	Pre-Conditioned Air
SO₂	Sulphur Dioxide
NO₂	Nitrogen Dioxide
NO_x	Nitrogen Oxides
PM₁₀	Airborne particulate matter with a diameter of 10 micrometres or less
PM_{2.5}	Airborne particulate matter with a diameter of 2.5 micrometres or less
CO	Carbon Monoxide
KW	Kilowatt
EPC	Engineering, Procurement, and Construction
EHS	Environment, Health and Safety

4. RELATED DOCUMENTS

This AQMP should be read in conjunction with the FTA Environmental and Social Monitoring Plan (ESMoP) and the Carbon Management Plan (CMP). In addition, the following documents should also be considered:

- Environmental and Social Management System Guide
- Pollution Prevention and Monitoring Procedure
- Greenhouse Gas Monitoring Plan and Emission Report Preparation Control Procedure
- Greenhouse Gas Emissions Risk Assessment Instruction
- 400 Hz. Operating Instructions

- Greenhouse Gas Activity Data Monitoring Plan
- Regulation on Control of Industrial Air Pollution (SKHKKY)
- Regulation on Monitoring of Greenhouse Gas Emissions
- Equator Principles, IFC Performance Standards, EBRD Performance Requirements
- 8.46KY.1.05 - Audit Procedure

5. ROLES AND RESPONSIBILITIES

Roles and responsibilities were assessed on the basis of the Project sponsor (FTA), the EPC Contractor (ATS) and DHMI and the functions within these organisations that may be relevant to this work.

5.1 Project Sponsor (FTA) Functional Responsibilities

FTA has assigned departments or specialized employees within the organization to monitor Environmental and Social Responsibility, Human Resources, Occupational Health and Safety, Community Liaison Officer and other specific areas.

The department short codes in the FTA are used for convenience in the document as follows. CLO = Community Liaison Officer, GM= General Manager, QM(QM)= Quality Department, TK= Technical Department, OHS= Occupational Health and Safety, IT= Information Technology, HR= Human Resources, OPS= Operations, SEC= Security Department, TI (C&M)= Trade and Marketing, FI= Finance, SA= Procurement, CC= Corporate Communications.

Table 1. FTA Roles and Responsibility

Roles	Responsibility
Project Sponsor: FTA	Responsible for the development of the ESMS, which determines the systems and processes established to manage environmental, social and occupational health and safety issues. Responsible for determining the policies for the Project, implementing the ESMS and ensuring that they are carried out in accordance with the conditions of other management systems. FTA has overall accountability for the appropriateness of Project activities during operation phases with consultation with DHMI for airside activities. FTA is responsible for supervising and monitoring the implementation of relevant ESMP elements by the EPC Contractor and its subcontractors during the Construction phase.
CC: Corporate Communication	The CC, in cooperation with the QM, QD and CLO, is responsible for any action requiring contact with third parties, such as local authorities.
QM: Quality Department	The QM is responsible for the preparation of the AQMP, its execution in its entirety, its revision, when necessary, its publication and distribution,

	and its cancellation in case of abolition. All management/employees are responsible for keeping this AQMP in the departments, announcing it to the personnel and acting in accordance with the principles of the AQMP.
TK: Technical Department	The TK is responsible for supporting the QM in its role to implement and review the AQMP in accordance with good practice to ultimately reduce operational emissions and safeguard air quality.

The Quality Department is responsible for the preparation of the AQMP, its execution in its entirety, its revision, when necessary, its publication and distribution, and its cancellation in case of abolition. All management/employees are responsible for keeping this plan in the departments, announcing it to the personnel and acting in accordance with the principles of the plan.

5.2 DHMI Functional Responsibilities

DHMI is responsible for the implementing sections of the AQMP pertaining to airside operations. DHMI and FTA must liaise to ensure that the AQMP is implemented and periodically reviewed, as set out in Section 7, to minimise airside emissions as far as reasonably practicable safeguarding future air quality.

6. SUMMARY OF EMISSION SOURCES

6.1 Overview

There are a number of existing emission sources that are present at the airport that will not be affected by the proposed expansion plans. A description of these sources and the approach to monitoring is set out within this plan.

6.2 Energy Centre

For energy supply of the airport, there are 2 heating centres and a trigeneration power centre with an installed capacity of eight (8) MW. Terminal 1 Heating Centre (T1 HC) serves the domestic terminal and T1 international terminal and consists of HV-LV (high voltage-low voltage) systems, a water treatment system, six (6) cooling towers, six (6) chillers and three (3) boilers. Terminal 2 Heating Centre (T2 HC) serves the T2 international terminal and consists of HV-LV systems, a water treatment system, five (5) emergency generators, four (4) chillers and three (3) boilers.

The New Power Centre (NPC) is located in a covered area of 3,049m² and consists of HV-LV systems, cooling towers, a Supervisory Control and Data Acquisition (SCADA) system room. The trigeneration consists of three (3) emergency generators, four (4) gas engines, four (4) waste heating boilers and two (2) ABS (absorption) chillers.

There are emergency generators which are using diesel. These are only used for testing and have not been required for use. There are currently eight (8) back-up generators In addition to the existing

generators, seven (7) generators have been added at KS3 and two (2) at GTB for a total of nine (9) generators to serve new operations as part of the expansion project.

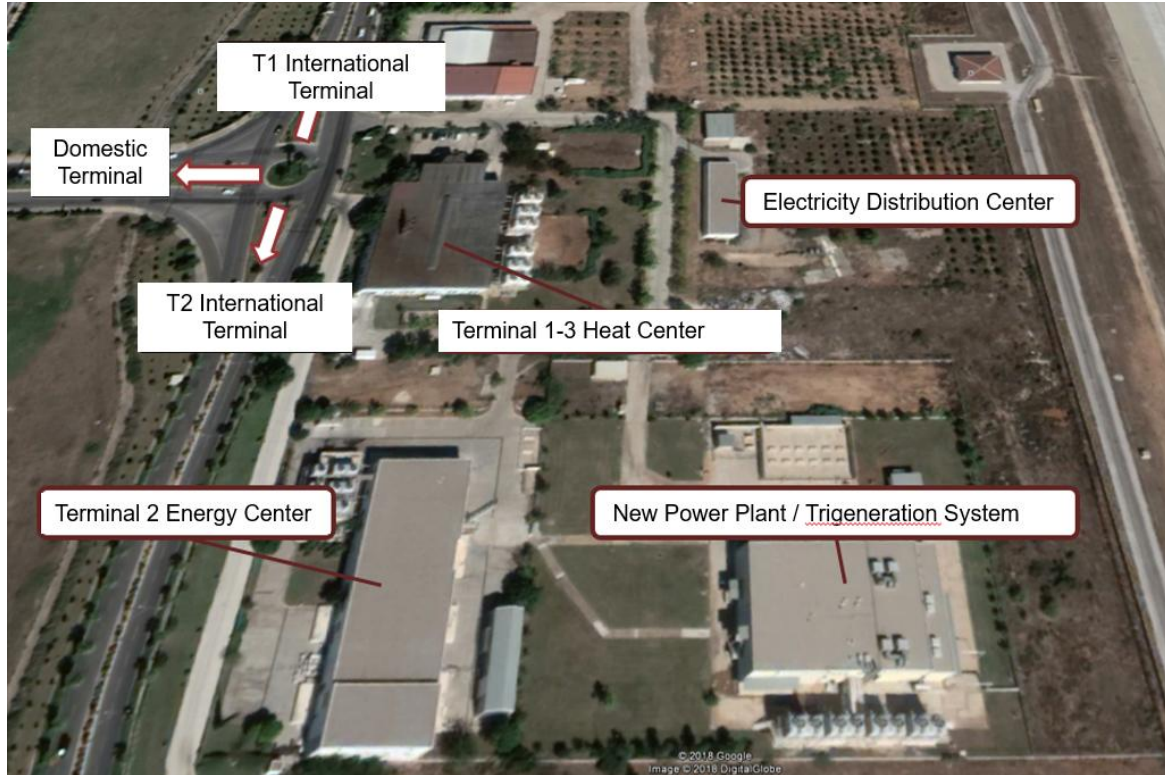


Figure 1. Map 1 Fraport TAV Energy Center Buildings

6.3 Trigenation System

Antalya Airport's energy needs are met by the trigenation system. The trigenation system operates under license issued by the Energy Market Regulatory Authority (EMRA) of the Republic of Türkiye which sets out emission limit values, stack emissions monitoring and reporting schedules. In addition to the licence requirements, the trigenation system will be operated in accordance with the manufacturer's operating and maintenance procedures to ensure equipment is available, air emissions are minimised and equipment and performance guarantees provided by the EPC are achieved.

The trigenation system operates on natural gas and alternatively liquefied natural gas (LNG) for electricity generation. In addition to the trigenation system, grid electricity is also used in the summer months due to increased air traffic. On the other hand, the extra electricity generated in winter is sold to DHMI (Türkiye's General Directorate of State Airports Authority) and provides additional income. The eight (8) MW Trigenation Plant installed by FTA saves energy by using waste heat for heating and cooling purposes. The number of emissions from the plant is significantly lower compared to other thermal power plants due to the combined cycle power plant which produces electricity and heat, and the energy management that helps recover thermal energy.

Approximately 50% of the airport's energy needs are provided by trigeneration and cogeneration units.

Electricity generation at this site (the trigeneration system) using natural gas, it becomes operational when it is cheaper to do so than using grid electricity. Hot and cold water is also produced from natural gas by the tri-generation system and gas boilers. The trigeneration is more frequent in operation for hot water production during the winter and cold water in summer.



Figure 2. Trigeneration Power Plant

There are 13 heating boilers in service at Fraport Tav Antalya Airport, including the buildings built within the scope of the expansion project.

With the newly added 3 boilers, the total thermal power increased from 23.46 MW to 34.63 MW.

The table below shows the newly added boilers and their thermal capacities.

Table 2:Total Boilers

ENERGY CENTER HEATING BOILERS LIST									
No	DEVICE NAME	LOCATION	BRAND	FUEL	HEATING POWER (kW)	AMOUNT OF ENERGY ENTERING THE SYSTEM (KW)	CAPACITY (kCal/h)	YIELD (%)	YEAR OF MANUFACTURING
1	HEATING BOILER-1	TERMINAL-1 HEATING CENTER	AKINISI	FUEL OIL	4.651	4.910	4.000.000	0,95	1997
2	HEATING BOILER-2	TERMINAL-1 HEATING CENTER	BUDERUS	NATURAL GAS	5.200	6.139	4.472.000	0,85	2011
3	HEATING BOILER-3	TERMINAL-1 HEATING CENTER	BUDERUS	NATURAL GAS	5.200	6.139	4.472.000	0,85	2011
4	HEATING BOILER-4	TERMINAL-1 HEATING CENTER (NEW)	VIESMANN	NATURAL GAS	2.750	2.972	2.365.000	0,93	2023
5	HEATING BOILER-1	TERMINAL-2 ENERGY CENTER	VIESMANN	NATURAL GAS	1.453	1.711	1.250.000	0,85	2004
6	HEATING BOILER-2	TERMINAL-2 ENERGY CENTER	VIESMANN	NATURAL GAS	1.453	1.711	1.250.000	0,85	2004
7	HEATING BOILER-3	TERMINAL-2 ENERGY CENTER	VIESMANN	NATURAL GAS	1.453	1.711	1.250.000	0,85	2004

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8	WASTE HEAT BOILER -1	NEW POWER CENTER	UNIVERSAL	WASTE HEAT	1.017	4.739	875.000	0,21	2009
9	WASTE HEAT BOILER -2	NEW POWER CENTER	UNIVERSAL	WASTE HEAT	1.017	4.739	875.000	0,21	2009
10	WASTE HEAT BOILER -3	NEW POWER CENTER	UNIVERSAL	WASTE HEAT	1.017	4.739	875.000	0,21	2009
11	WASTE HEAT BOILER -4	NEW POWER CENTER	UNIVERSAL	WASTE HEAT	1.017	4.739	875.000	0,21	2009
12	HEATING BOILER-1	HEATING CENTER-3 (NEW)	VIESMANN	NATURAL GAS	4.200	7.436	3.612.000	0,56	2023
13	HEATING BOILER-2	HEATING CENTER-3 (NEW)	VIESMANN	NATURAL GAS	4.200	7.436	3.612.000	0,56	2023

Table 3: Generators and Gas Engine

ENERGY CENTER GENERATORS & GAS ENGINES							
No	DEVICE NAME	LOCATION	BRAND	FUEL	POWER (KVA)	AMOUNT OF ENERGY ENTERING THE SYSTEM (KW THERMAL INPUT)*	YEAR OF MANUFACTURING
1	GENERATOR-1	TERMINAL-2 ENERGY CENTER	MTU LSA 52.2 VL60-4P	DIESEL	1600	2844	2004
2	GENERATOR-2	TERMINAL-2 ENERGY CENTER	MTU LSA 52.2 VL60-4P	DIESEL	1.600	2844	2004
3	GENERATOR-3	TERMINAL-2 ENERGY CENTER	MTU LSA 52.2 VL60-4P	DIESEL	1.600	2844	2004
4	GENERATOR-4	TERMINAL-2 ENERGY CENTER	MTU LSA 52.2 VL60-4P	DIESEL	1.600	2844	2004
5	GENERATOR-5	TERMINAL-2 ENERGY CENTER	MTU 12V4000G14F	DIESEL	1.700	3022	2021
6	GENERATOR	NEW POWER CENTER	AKSA ACO2250 HVSI804R1	DIESEL	2.148	3819	2009
7	GENERATOR	NEW POWER CENTER	AKSA ACO2250 HVSI804R1	DIESEL	2.148	3819	2009
8	GENERATOR	NEW POWER CENTER	AKSA ACO2250 HVSI804R1	DIESEL	2.148	3819	2009
9	GAS ENGINE	NEW POWER CENTER	MWM TCG 2020 V20	NATURAL GAS	2.500	4444	2009
10	GAS ENGINE	NEW POWER CENTER	MWM TCG 2020 V20	NATURAL GAS	2.500	4444	2009
11	GAS ENGINE	NEW POWER CENTER	MWM TCG 2020 V20	NATURAL GAS	2.500	4444	2009
12	GAS ENGINE	NEW POWER CENTER	MWM TCG 2020 V20	NATURAL GAS	2.500	4444	2009
13	GENERATOR	KS3	CAT 3516B	DIESEL	2.000	3556	2023

14	GENERATOR	KS3	CAT 3516B	DIESEL	2.000	3556	2023
15	GENERATOR	KS3	CAT 3516B	DIESEL	2.000	3556	2023
16	GENERATOR	KS3	CAT 3516B	DIESEL	2.000	3556	2023
17	GENERATOR	KS3	CAT 3516B	DIESEL	2.000	3556	2023
18	GENERATOR	KS3	CAT 3516B	DIESEL	2.000	3556	2023
19	GENERATOR	KS3	CAT 3516B	DIESEL	2.000	3556	2023
20	GENERATOR	GTB	CAT C18	DIESEL	660	660	2023
21	GENERATOR	GTB	CAT C18	DIESEL	660	660	2023

Note: Based on a power factor of 0.8 and thermal combustion efficiency of 45%

6.4 New infrastructure works

A new building was constructed, during Phase 1 expansion works, to house hot and cold-water generation for the new terminal buildings and another building to house distribution and emergency generators. The new heating centre and power plant using natural gas has been developed to cater for the increasing size of the airport.

The emissions associated with the operation of these new infrastructure assets will significantly contribute to the overall emissions of pollutants and the GHG footprint.

As part of Phase 1 the existing fuel farm (37,000 m³ storage capacity) was demolished and a new new fuel farm constructed with an 80,000 m³ storage capacity, this will have the potential to release fugitive emissions volatile organic compounds (VOCs) which have the potential to affect ambient air quality. As part of Phase 3 the fuel farm will be expanded to 150,000 m³ capacity, with construction due to commence in 2038 and be completed by the end of 2040. This was highlighted within the ESIA as a potential impact and the requirement of monitoring to fully understand these impacts included.

6.5 Wastewater treatment plant (WWTP)

The capacity of the WWTP increased from 4,500 m³ to 7,500 m³. This has been done through technological improvements rather than physical infrastructure additions.

The WWTP treats aircraft “blue water” (wastewater from planes, i.e., from toilets, etc). There is a, a 120 m³ plant to the north of T1 to handle blue water specifically. There is also be a 200m³ capacity WWTP to serve the new southern area.

Emissions associated with wastewater treatment systems including purification comes at the cost of high energy consumption, therefore affecting energy demand and GHG emissions, transportation, and the use of chemicals¹.

6.6 Airside activities

A key source of emissions affecting air quality and the GHG footprint at the airport is from airside activities which support the operation of the airport. Sources of emissions that are considered within this category amongst others, include:

- Airside vehicles / Ground Support Equipment (GSE)

¹ Parravicini, V, 2016. GHG emissions from WWTP [Greenhouse Gas Emissions from Wastewater Treatment Plants - ScienceDirect](#)

- Engine Run-up Facilities (ERUF)
- Auxiliary Power Units (APUs)
- Aviation fuel tanks
- Fire training
- Aircraft Maintenance
- Catering

Aircraft at parking stands normally use their Auxiliary Power Units (APUs) to provide electrical power when the main engines are switched off.

ERUF emissions cannot be controlled by FTA as this activity is related to aircraft maintenance activities. Similarly, GSE emissions are out of control of FTA as this activity is outside of FTA's operational remit.

6.7 Landing and Take-off movements

Emissions for aircraft in the Landing-Take-off (LTO) cycle (LTO nominally up to 3,000 feet or 914.4 metres above ground level) contribute to total airport emissions.

The LTO cycle consists of the following eight phases which are applied for the purposes of emissions quantification. For the Three-Runway System (3RS) EIA a simplified four modal phase approach has been chosen to represent approach, taxi/idle, take-off and climb, as shown below.

- Taxi:
 - taxi-out;
 - hold at runway head;
 - taxi-in.
- Take-off:
 - take-off roll (from start-of-roll to wheels-off);
- Climb:
 - initial climb (i.e., wheels-off to throttle-back);
 - climb-out (from throttle-back to 1000 m altitude);
- Approach:
 - approach (from 1000 m altitude to runway threshold);
 - landing roll (from threshold to runway exit);

Emissions from the LTO cycle are out of the scope of FTA and this AQMP and have not been considered further.

6.8 Surface access

Emissions of primarily NO₂ and PM are associated with surface access to the airport. This falls outside of FTA management and monitoring requirements and are not included further within this AQMP.

7. AIR QUALITY MANAGEMENT

7.1 Overview

The overarching air quality monitoring requirements are set out within the Environmental and Social Monitoring Plan (ESMoP).

Air emissions resulting from FTA operations are managed in accordance with the provisions of the Regulation on the Control of Industrial Air Pollution by the Ministry of Environment, Urbanization and Climate Change.

Within the scope of the Environmental Permit and License Regulation, FTA has the Environmental Permit on Air Emission and Wastewater Discharge expired on 07.08.2027. The existing Environmental Permit will be renewed in accordance with regulatory requirements, due to the increase in capacity resulting from the addition of new combustion equipment. The permit sets out emission limits for the boilers and trigeneration plant and the requirements for monitoring of emissions.

Table 5 presents the relevant RCIAP (SKHKKY) emission limit values that will likely form part of the updated permit, however, final emission limit values within an environmental permit are at the discretion of the Regulator and are set on a case-by-case basis.

Table 6 presents the relevant IFC emission guidelines. Lender's emission guidelines are not typically included within a national environmental permit although may form part of lenders agreements and Engineering, Procurement, and Construction (EPC) contracts.

7.2 National Legislation

Ambient air quality

Within the framework of national legislation, limit values for all kinds of industrial activities are given in the Regulation on the Control of Air Pollution Originating from Industry (RCAPOI). Ambient air limit values are provided in Annex-2 Table 2.2 of RCAPOI and these limit values decrease gradually over the years until 2024.

The European Union sets limit values in Directive (2024/2881). The EU limit values have been used as a reference and to supplement national standards where specific averaging periods are not included. The majority of Turkish and EU limit values and allowances (with a December 2026 attainment date) are synonymous. However, the EU limit values to be attained by January 2030 are more stringent than both the National and current EU limit values and have been provided as a reference and as an aspirational target only.

The limit values for key parameters in Table 12 of the RCAPOI and from the EU Directive 2024/2881 are shown in Table 4.

Table 4. Ambient limit values stipulated in the RCAPOI (2024 onwards), EU Council Directive

Ambient limit values ($\mu\text{g}/\text{m}^3$)				
Parameter	Period	Turkish Limit Values (2024 onwards) ⁽¹⁾	EU Limit Values to be attained by 11 December 2026 ⁽²⁾	EU Limit Values (to be attained by 1 January 2030) ⁽²⁾
SO ₂	Hourly	350 not to be exceeded more than 24 times a calendar year	350 not to be exceeded more than 24 times a calendar year	350 not to be exceeded more than 3 times per calendar year
	Daily	125 not to be exceeded more than 3 times a calendar year	125 not to be exceeded more than 3 times a calendar year	200 not to be exceeded more than 18 times per calendar year
	Annual	20	-	20
NO ₂	Hourly	200 not to be exceeded more than 18 times a calendar year	200 not to be exceeded more than 18 times a calendar year	200 not to be exceeded more than 3 times per calendar year
	24 hours	-	-	50 not to be exceeded more than 18 times per calendar year
	Calendar year	40	40	20
PM ₁₀	24 hours	50 not to be exceeded more than 35 times a calendar year	50 not to be exceeded more than 35 times a calendar year	45 not to be exceeded more than 18 times per calendar year
	Annual	40	40	20
PM _{2.5}	24 hours	-	-	25 not to be exceeded more than 18 times per calendar year
	Annual	-	25	10
VOC	Hourly	280	-	-
	Short term limit (STL)	70	-	-
	Annual (as Benzene)		5	3.4
CO	Maximum daily eight hour running mean	10000	10000	10000
	24 hours	-	-	4000 not to be exceeded more than 18 times per calendar year

1 Annex-2 Table 2.2 of RCAPOI

2 EU Council Directive 2024/2881 on ambient air quality and cleaner air for Europe

Emission standards

Within the scope of the Regulation on the Control of Industrial Air Pollution (RCIAP), emissions from energy production are required to be measured annually by an accredited laboratory for the

parameters specified in Table 3. These regulations cover the existing plant that is currently operating.

Table 5. RCIAP (SKHKKY) emission limit values according to emission source

RCIAP emission limit values						
Emission Source	Regulation on the Control of Industrial Air Pollution (SKHKKY in Turkish) (Group in Annex-5)	Emission limit value (mg/Nm ³)				
		CO	NO	NO ₂	SO ₂	Dust
Boiler - Liquid Fuel	Annex5-A.2.4	150			1700	150
Boiler - Gas Fuel	Annex5-A.2.5	100		800	100	10
Gas Engines	Annex5-A2.7.1	1000		*1000	60	130

* The NO₂ value for gas engines refers to the limit value for NOx.

** Limit at 6% oxygen by volume

7.3 International Requirements

IFC Standards

IFC Performance Standard 3: Resource Efficiency, Pollution Prevention and Control aims to: "Prevent or minimize adverse impacts on human health and the environment by preventing or minimizing pollution from project activities."

To meet this objective, the IFC provides both industry-specific and general guidance on Good International Industry Practice in relation to ambient air quality and emissions to air. The Project will be required to meet the IFC Performance Standards, and the standards set out in the IFC General EHS Guidelines and the IFC Airports EHS Guidelines 2007. The IFC General EHS Guidelines state that "relevant standards" for ambient air quality are national standards mandated by law or, in their absence, existing World Health Organization (WHO) Air Quality Guidelines or other internationally recognized sources. As Türkiye has its own legally mandated standards as mentioned above, these standards are used to determine the significance of potential ambient impacts.

For emission limits a project is expected to meet the more stringent of those set out within the IFC guidelines or national requirements. Table 6 presents the IFC emission guidelines relevant combustion plant at AYT.

Table 6. IFC emission guidelines according to emission source

IFC emission guidelines			
Emission Source	Emission guidelines (mg/Nm ³)		
	Particulate Matter (PM)	SO ₂	NOx
Boiler - Liquid Fuel*	50 or 150 if justified in environmental assessment	2000	460
Boiler - Gas Fuel*	-	-	320
Gas Engines**	-	-	200 (spark ignition) 400 (Dual Fuel) 1,600 (compression ignition)

Engines – Liquid Fuel**	50 or up to 100 if justified by project specific considerations (e.g. Economic feasibility of using lower ash content fuel, or adding secondary treatment to meet 50, and available environmental capacity of the site)	1.5% sulphur content	If bore size diameter less 400mm: 1460 (or up to 1,600 if justified to maintain high energy efficiency.) If bore size diameter greater then or equal to 400mm: 1,850
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* Limit at 3% oxygen by volume, dry gas, 0°C, 1 atmosphere

** Limit at 15% oxygen by volume, dry gas, 0°C, 1 atmosphere

EBRD Standards

EBRD Environmental and Social Policy PG3: Resource Efficiency, Pollution Prevention and Control, sets out the requirements for air quality and are set out below:

“Adopt a mitigation hierarchy approach to address adverse impacts on human health and the environment due to pollution and resource use released from the project.”

PG3 refers to EU material environmental standards and requires projects to be structured so that these standards can be applied at project level.

“Where regulations in the host country differ from the level and measures presented in the EU material environmental standards or other defined appropriate environmental standards, projects will need to comply with the more stringent of these.” This is applicable for emission limits.

However, according to the EBRD Performance Requirements, national ambient air quality standards are the primary standards applicable to the Plan irrespective of how stringent they are compared to appropriate international requirements.

7.4 Emissions monitoring

Periodic emissions monitoring of the proposed boilers will be undertaken annually by an appropriate third-party contractor with relevant certifications to comply with the requirements of the permit. Monitoring is to be undertaken using national approved methods, or in their absence internationally recognised approaches, such as those stipulated by the US EPA or the EU.

Annual period monitoring of the existing trigeneration and new energy facility as per the existing permit requirements remain unchanged.

Annual monitoring results of the trigeneration plant will be compared to the limit values in Table 4 above.

7.5 Management measures

7.5.1 Current Measures

Following arrival at the stand, fixed energy ground power and preconditioned air are supplied to the aircraft. This limits the use of aircraft auxiliary power units (APUs) reducing emissions. This measure has been incorporated into the list of key performance indicators listed in Table 7.

7.5.2 Future measures

While it is acknowledged FTA do not have control over all emission sources at the airport, measures to reduce airside emissions will be discussed with DHMI to further reduce operational emissions and reduce the airports contributions to pollutants such as NO₂, PM₁₀ and CO and have been incorporated into key performance indicators listed in Table 7.

7.5.3 Key performance indicators

In year 1 of the AQMP coming into effect, FTA and DHMI will agree key performance indicators (KPI) to evaluate the below measures based on what is both financially and operationally practicable. These KPIs will include a description of the measure and a future year to deliver. Table 7 provides an initial indication of the measures and their KPIs although remain subject to discussion between FTA and DHMI. An example, although not exhaustive list, of additional measures includes:

- Further specific management measures that will be taken to reduce emissions of VOCs from the fuel farm
- Management measures that address reduction of emissions from car parking and drop offs, as airports use a wide range of levers to minimise emissions from this source

Performance against the KPIs will be reviewed and evaluated by the Quality Department, with support from the Technical Department, annually with an objective to encourage stricter targets and ensure existing measures are on target to be achieved.

Table 7. Management measures - key performance indicators

Management measures - key performance indicators				
ID	Description of Action	KPI	Target/Acceptance criteria	Responsibility
AQMP-01	Target to electrify the fleet of GSEs	Percentage of GSE that are electric or other zero emission alternative	Year on year increase from 2027 50% of GSE electric or zero emission alternative by 2035 75% of GSE electric or zero emission alternative by 2040	Technical Department
AQMP-02	Installation electric charging stations on landside and airside parking areas to enable travel by electric vehicle.	Number of landside and airside electric vehicle charging points available to all vehicle types for both passengers, staff and airside operations.	Year on year increase in electric vehicle charging points.	Car Park Management and Technical Department
AQMP-03	Investigate and develop implementation of staff travel plans through the use of low emission vehicles and increasing the use of more sustainable mode share transport. Travel plans must align with the FTA Traffic Management Plan (8.46.TMP.6).	Evidence of plan to investigate and develop a site travel plan. Site travel plan implemented	Investigation scope drafted by year end of 2027 Site travel plan implemented by year end 2028	HR (Administrative Affair) Department
AQMP-04	FTA will inform the Fuel Farm Operator regarding the reduction of VOC emissions at the fuel farm, and the Fuel Farm Operator will ensure the implementation of measures including the provision of regular training/toolbox talks to workers, regular maintenance of equipment, cleaning of spillages, and the application of protocols to minimize other fugitive releases	Evidence of training provided and future training planned	Training plans in place by start of AQMP coming in to force.	Fuel Farm Operator

Table 8. Air quality monitoring summary

Air Quality Monitoring Plan						
ID	Source Document	Description of Monitoring Action/Action	Frequency / Timing	KPI	Target/ Acceptance criterion	Responsibility
AQMP-05	-	FTA will make best efforts to ensure that the Fuel Farm Operator volatile organic compound (VOC) monitoring at locations around the fuel farm and comparison with the Turkish limit value Prior to ambient monitoring commencing, a monitoring plan detailing type of equipment, sampling methods, monitoring locations including their relative position to sensitive receptors, and pollutants being monitored. The Monitoring period (duration) must be sufficient to enable comparison with the Turkish hourly VOC limit value	Prior the Operation	Establish a plan to monitor ambient VOC concentrations at locations representative of public exposure around the fuel farm. Implement the monitoring plan. Ambient measured VOC concentrations must not exceed Turkish limit value at locations representative of public exposure. Where the fuel farm is expanded, or fuel use increases, the ambient measured VOC concentrations must not increase year on year.	VOC monitoring plan established and implemented by the start of 2027 Ambient measured VOC concentration is below the Turkish limit value. Ambient measured VOC concentrations remain constant or decrease year on year	Technical Department- Fuel Farm Operator
AQMP-06	Local Legislation No. 31296, 06/11/20 IFC PS3, EBRD PR3	Periodic emissions monitoring of new energy plant	Annual	Reporting of emission concentrations from the new energy plant	Monitored emission concentrations do not exceed emission limit values.	Technical Department

7.6 Analysis, Reporting and Actions

7.6.1 Annual Emission Testing

Reports from the third-party monitoring consultant/contractor will be reviewed by the Energy Systems department and Quality department prior to submission to the regulatory authority. All reports from the contractor are required to include the monitoring approach, relevant emission standards, details on monitoring durations and associated technical details of plant, such as fuels and load. Appropriate calibration certificates of instrumentation will be appended to the report results.

Where emission tests are found to be above applicable emission limit values, this will be reported immediately to the Environmental Manager. An investigation into the cause of the exceedance(s) will be carried out by the Environmental Manager and appropriate remedial action taken. Any such event will be logged appropriately, and a copy will be stored in the project site detailing the cause and remedial action taken to resolve the issue.

FTA will provide an annual summary report of emissions to air for submission to the lenders. This will include as a minimum:

- Description of monitoring
- Applicable limits
- Monitoring results
- Evidence of third-party capability
- Evidence of submission to regulator
- Evidence of appropriate calibration certificates

8. GREENHOUSE GASES MANAGEMENT PRACTICES

8.1 Overview

The Project Environment and Social Impact Assessment (ESIA) (February 2023) highlighted a range of Scope 1, 2 and 3 Greenhouse Gas Emissions² (GHG) that could occur during the operational phase as a result of FTA operations. The following sections offer guidance and an approach for managing infrastructure carbon in line with measures detailed within the project ESIA, as well as international and national GHG legislation, standards, and best practices.

The Greenhouse Carbon Management Plan includes Scope 1, 2 and 3 greenhouse gas emissions, as well as defining the emission sources and the frequency of monitoring.

Antalya Airport participates in the Airport Carbon Accreditation (ACA) initiative started by Airport Councils International (ACI) Europe and maintains certificate for Level 3+ ('Neutrality') accreditation. As part of reporting against this, a Climate Change Report³ is published annually and verified to standard ISO 14064-3. The Climate Change Report defines targets related to reduction of emissions which apply to the project. There is an accompanying Carbon Management Plan, first prepared in 2011, is reviewed and republished every 3

² Scope 1 covers emissions from sources that an organisation owns or controls directly. Scope 2 are emissions that a company causes indirectly when the energy it purchases and uses is produced. Scope 3 encompasses emissions that are not produced by the company itself, and not the result of activities from assets owned or controlled by them, but by those that it's indirectly responsible for, up and down its value chain.

³ Climate Change Report 2009-2025. [Online] Available at: https://www.antalya-airport.aero/files/FTA_Climate_Change_Report-5.pdf

years.⁴ The Carbon Management Plan includes Scope 1, 2 and 3 greenhouse gas emissions, as well as defining the emission sources and the frequency of monitoring.

8.2 GHG Legislation and Standards

National Legislation Scope

Under national legislation, the Regulation on Greenhouse Gas Emissions and the 'Regulation on the Monitoring of GHG Emissions' outlines the procedures and principles related to the works and processes of monitoring, verification, and reporting of emissions⁵.

The threshold value for this regulation is the combustion of fuels at installations with a total rated thermal power of 20MW or above. In accordance with the relevant legislation, FTA annually calculates its greenhouse gas (GHG) emissions resulting from fuel combustion. These calculations are subsequently verified by an accredited third party, and the verified emission reports are submitted to the Ministry of Environment, Urbanization and Climate Change. This emission calculation and reporting process is carried out entirely within the framework of legal compliance and is conducted independently from FTA's ACA accreditation process.

The Regulation on Ozone Depleting Substances sets out the procedures for use (including production, import and export) and end of life (including recovery, recycling, reclamation and destruction) of ozone depleting substances falling under the Montreal Protocol.⁶

The Regulation on Fluorinated Greenhouse Gases outlines the procedures and principles of management emissions of fluorinated greenhouse gases (known as F-gases)⁷, in line with the Montreal Protocol. The regulation covers the use, application, data collection, and reporting of F-gases for products and equipment.

IFC Standards

The IFC Performance Standard 3 provides a "project-level approach to resource efficiency and pollution prevention and control in line with internationally disseminated technologies and practices"⁸. This standard aims to avoid or minimize adverse environmental or health impacts by promoting the use of more sustainable resources and reducing GHG emissions.

The IFC provides both industry-specific and general guidance on GIIP in relation to ambient air quality and emissions to air. The Project will be required to meet the IFC Performance Standards, and the standards set out in the IFC General EHS Guidelines and the IFC Airports EHS Guidelines 2007¹. Alongside this, the Project should implement technically and financially feasible and cost-effective measures for improving efficiency in consumption of resources across scopes 1, 2 and 3⁹.

The requirements of this standard which relate to GHGs are:

- The Project will need to consider additional measures (on-top of resource efficiency) to reduce GHG emissions related to the Project during the design and operation stages (this includes the reduction of fugitive emissions).

⁴ Antalya Airport, Management Systems, Airport Carbon Accreditation. Available at: [Airport Carbon Accreditation](#)

⁵ Turkish Regulation on the monitoring of Greenhouse Gas emissions, 2014. Available at: [Turkey GHGE-Regulation.pdf \(csb.gov.tr\)](#)

⁶ ECOLEX, 2017. Available at: [Regulation on ozone-depleting substances. \(ecolex.org\)](#)

⁷ Turkey Announces Rules For Use Of Fluorinated Greenhouse Gases Listed In Kyoto Protocol, 2018. Available at: [Turkey Announces Rules For Use Of Fluorinated Greenhouse Gases Listed In Kyoto Protocol - Climate Change - Turkey \(mondaq.com\)](#)

⁸ IFC PS3: Resource Efficiency and Pollution Prevention. [Section 1: Purpose of this Policy \(ifc.org\)](#)

⁹ GHG Scopes are a commonly recognised standard for reporting emissions and are defined in the World Resources Institute's GHG Protocol. In summary, Scope 1 and 2 emissions are owned or controlled by a company or project, and Scope 3 emissions are indirect and a result of activities of the company or project. Section **Error! Reference source not found.** sets out reduction measures under each of these scopes.

- Where projects produce (or will produce) more than 25,000 tonnes of CO₂e¹⁰ annually, it will need to quantify “direct emissions from the facilities owned or controlled within the physical project boundary, as well as indirect emissions associated with the off-site”. The quantification of GHGs will need to be undertaken annually “in accordance with internationally recognized methodologies and good practice” such as the GHG protocol¹.

As Türkiye has its own legally mandated standards as part the Environmental Law as mentioned above, these standards are used to determine the potential GHG impacts of the project.

EBRD Standards

The EBRD Standard relating to GHG emissions is EBRD Environmental and Social Policy Performance Requirement 3 (PR3): Resource Efficiency, Pollution Prevention and Control¹¹.

The GHG requirements of this standard are similar to those of the IFC standards, with regards to following a mitigation hierarchy in implementing options to minimise project related GHG emissions during the design and operation stage of the project.

The standard also sets out the following parameters for quantification of GHG emissions in accordance with EBRD Protocol for Assessment of Greenhouse Gas Emissions. Projects should quantify emissions if they:

- “have, or are expected to have, gross emissions in excess of 100,000 tonnes CO₂- equivalent annually. Or,
- are expected to result in a net change in emissions, positive or negative, of more than 25,000 tonnes of CO₂-equivalent annually post-investment”².

8.3 Measures to Reduce Greenhouse Gas Emissions

There are many GHG reduction measures for scope 1, 2 and 3, which could be applicable during operational phase. Further detail is available in the Carbon Management Plan. A summary of potential measures in line with the Project ESIA and best practice guidance such as ‘feasibility of zero emissions airport operations in England by 2040’¹² are provided below:

Scope 1 – GHG reduction measures including, but not limited to:

- In order to maximise operational efficiency, periodic maintenance of equipment and vehicles will be carried out. Assessments of the greenhouse gas impact of inefficient equipment and vehicles will be included in the maintenance program.
- R-134a and R-410a refrigerants will be used in the air conditioning system. Where possible, refrigerants with lower global warming potential (GWP) will be used.
- Minimize waste during airport services and ground operations by reducing resource use and optimizing the recycling and reuse rate. Waste recycling rates will be strictly monitored, and efforts will be made to develop a waste management plan to reduce waste.

¹⁰ Greenhouse Gases (GHGs) refer to the seven gases covered by the Kyoto Protocol: carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF₆) and nitrogen trifluoride (NF₃). These are measured in units of carbon dioxide equivalent (CO₂e) which expresses the impact of each gas in terms of the amount of CO₂ that would create the same impact.

¹¹ EBRD – Environmental and Social Policy (ESP), 2019. [Environmental and Social Policy \(ebrd.com\)](https://www.ebrd.com/Environmental-and-Social-Policy)

¹² Catapult, 2022. Feasibility of zero emissions airport operations in England by 2040. [Feasibility of Zero Emissions Airport Operations in England by 2040 - Connected Places Catapult](https://www.catapult.co.uk/Feasibility-of-zero-emissions-airport-operations-in-England-by-2040-Connected-Places-Catapult)

- Unregulated and Regulated energy, and fuel consumption can improve energy efficiency and cost savings. Reducing total operational energy made up of regulated components, including heating and cooling, hot water, ventilation, and lighting, etc.
- Decarbonisation of airport operation vehicles such as fire tenders, airport de-icing, and company cars.

Scope 2 – GHG reduction measures including, but not limited to:

- Decarbonisation and diversification of energy generation and consumption. Reducing the reliance on grid electricity through the use of smart or microgrid technology. As well as, developing on-site renewable electricity generation using sustainable energy sources such as PV, wind, hydrogen, biogas, etc.

Scope 3 – GHG reduction measures including, but not limited to:

- Reducing emissions from 3rd Party Airside vehicles. Infrastructure supporting low-carbon transportation methods such as vehicle charging stations will continue to be established at the airport. Consultations will be held with public transportation directorates to ensure easier and more frequent access to the airport by public transport.
- Decarbonisation of aircraft related ground emissions such as aircraft taxi and aircraft line maintenance, etc. As well as other 3rd party vehicles (logistics, maintenance, refurbishment).
- Efforts will be made to encourage airlines to use sustainable aviation fuel.

8.4 GHG Emissions Monitoring

Emissions from energy production will be tracked annually as part of air quality monitoring. CO₂e included as part of this emissions monitoring. A "Greenhouse Gas Emission Report" is prepared as a result of the measurement. An example reporting table is below in Table 6.

Additionally, emissions from relevant activities for scope 1 (including fuel use in buildings and owned vehicles), 2 (including purchased grid electricity) and 3 (including third party vehicles and other airport activities) will be recorded similarly in the Greenhouse Gas Emission Report.

Table 9. Greenhouse Gas Emission Verification Notification Table

Greenhouse Gas Emission Verification Notification Table				
Emissions for the Report Year	Emissions (fossil) (t CO ₂ e)	Energy content (fossil) (TJ)	Report Items: Emissions (biomass) (t CO ₂ e)	Energy Content (biomass) (TJ)
Source Flows				
Combustion				
Process Emissions				
Mass Balance Method				

8.5 GHG Emission Verification Procedures

The Greenhouse Gas Emissions data and activities related to the development of the Project is subject to an external review. The prepared Greenhouse Gas Emission Report, field observation and control reports are supplement and support the verification procedures, and uploaded to the Greenhouse Gas Monitoring,

Reporting and Verification System in the Integrated Environmental Information System of the Ministry of Environment, Urbanization and Climate Change¹³.

Report preparation, monitoring and improvement are detailed in the "Greenhouse Gas Monitoring Plan and Emission Report Preparation Control Procedure" and "Greenhouse Gas Emissions Risk Assessment Instruction".

¹³ Ministry of Environment and Urbanization, 2015. [Prime Ministry General Directorate of Legislation Development and Publication \(resmigazete.gov.tr\)](http://resmigazete.gov.tr)

Table 6. GHG monitoring summary

GHG Monitoring Plan						
ID	Source Document	Description of Monitoring Action/Action	Frequency / Timing	KPI	Target/ Acceptance criterion	Responsibility
AQMP-07	Local Legislation No. 31296, 06/11/20 IFC PS3, EBRD PR3,	Greenhouse Gas notifications through the Integrated Environmental Information System	Annual	Greenhouse Gas Emission Verification Notification Table	Greenhouse Gas Report	Quality Department
AQMP-08	Local Legislation No. 29003, 17/05/14 IFC PS3, EBRD PR3,	Carrying out Greenhouse Gas Verification Procedures through the Integrated Environmental Information System	Annual	N/A	Greenhouse Gas Verification Report	Technical Department and Quality Department
AQMP-09	Local Legislation No. 29003, 17/05/14 IFC PS3, EBRD PR3, BP	Monitoring Refrigerant Gas Usage	As the purchase is made	Low GWP gas selection, repair any leaks to reduce leakage rate	Maintenance and repair forms invoices showing gas selection	Technical Department
AQMP-10	IFC PS3, EBRD PR3, BP	Category and Quantity of Electricity Purchased	Monthly	Green tariff rate	% 25	Technical Department
AQMP-11	Local Legislation No29314, 02/04/15 IFC PS3, EBRD PR3, BP	Quantity of Waste and Quantity of Recycled Waste	Monthly	Waste Recycling rate	2% increase compared to 2021	Technical Department

9. AUDIT AND REVIEW

This AQMP and procedures herein shall be reviewed and progress evaluated not less than annually with a record maintained detailing the findings of the review and evaluation process.

The correct implementation of this plan shall be verified through internal audits and monitoring in accordance with the requirements of the "Internal audit" section of the "ESMS manual and 8.46KY.1.05-Audit Procedure.

The schedule, frequency, scope and objectives of the audit and the responsible internal auditors will be specified in the Audit Program, which will be developed and updated by the Quality Department.

The internal audit will address the following:

- Correct implementation of this Plan;
- Correct and timely implementation of the audit and review system;
- Each of the points set out in the tables in section 6 and 7 of this Plan are addressed; and
- Annual review and evaluation of the measures contained within this AQMP has been undertaken no less than annually.

The main areas that auditors will specifically address during the audit are given in the Greenhouse Gas Monitoring Plan, Emission Report Preparation Control Procedure and Data Flow Activities Procedure.

The evidence and results of the site visit and audit activities are included in the "Site Observation Reports" and "Corrective Actions" records.

FTA management reviews audit results, the progress of corrective actions and takes additional appropriate measures, if necessary.

10.REPORTING

Evidence of the implementation of Actions/Measures (detailed in section 6 and 7 of this plan) and related results are collected through site visit and audit activities as detailed in section 8 "audit and review" of this plan; this evidence is described in audit and site observation reports.

FTA is responsible for collecting Environmental, Health and Safety statistics, which will include the number of environmental incidents, spills/leaks, and training statistics. FTA will also monitor the hazardous material storage areas with daily records. If any Subcontractor is involved, they are responsible for the proper implementation of the requirements contained in the supplier instruction under the supervision of FTA.

The findings and monitoring activities observed during the audit will be reported to the lenders in an annual monitoring report.