



# **Antalya Airport Expansion Project**

Environmental and Social Action Plan

November 2022

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# Antalya Airport Expansion Project

## Environmental and Social Action Plan

November 2022

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# Environmental and Social Action Plan<sup>1</sup>

PR/PS No.	Action	E&S Risks, Liability/Benefits	Requirement (Legislative, EBRD PR, IFC PS, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
<b>1</b>	<b>PR1 Assessment and Management of Environmental and Social Impacts and Issues</b>						
	<b>PS1 Assessment and Management of Environmental and Social Risks and Impacts</b>						
<b>1.1</b>	<u>Environmental and Social Assessment</u>	Compliance with Lenders' E&S standards	EBRD PR1 IFC PS 1	1. FTA 2. FTA	1. 2022 – Q4 2. 2023 – Q1	<ul style="list-style-type: none"> <li>EIA not required decision for solar power plant</li> <li>Local EIA and EIA affirmative decision for Fuel Farm</li> </ul>	
<b>1.2</b>	<u>Environmental and Social Management System (ESMS)</u>	An effective environmental and social management system	EBRD PR1 IFC PS 1 Good Practise	1. FTA 2. FTA& ATS /External Consultant 3. FTA	1. During operation 2. 2022 – Q4 3. Prior to operation	<ul style="list-style-type: none"> <li>Certifications for management systems</li> <li>Environmental and Social Management Plans and Procedures in place</li> </ul>	
<b>1.3</b>	<u>Policy</u>	An effective environmental and social management system	EBRD PR1 IFC PS 1 Good Practise	1. FTA 2. ATS	1. 2022 – Q4 2. 2022 – Q4	<ul style="list-style-type: none"> <li>Integrated Company Policy</li> <li>HSE and Social Policy</li> </ul>	

<sup>1</sup> This Environmental and Social Action Plan has been prepared in both Turkish and English languages, and the English version shall prevail over the Turkish version in case of an inconsistency between the two documents.

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1.4	<u>Environmental and Social Management Plan</u> Implement overarching Environmental and Social Management Plan (ESMP) for construction and operation phases.	An effective environmental and social management system Good EHS management procedures and reporting/ auditing procedures are established for operational and construction phase to successful management of operational risk and impacts on the environment	EBRD PR 1 IFC PS 1 Good Practise	FTA & External Consultant	2023 – Q1 & during construction and operation	● ESMP for operation and construction phase	
1.5	<u>Organisational Capacity and Commitment</u> 1. Recruit a Community Liaison Officer (CLO) to replace the temporary assigned CLO – to be cleared by the Lenders 2. Ensure that there is sufficient capacity to implement stakeholder engagement and grievance mechanism management, corrective action plan for land acquisition and supplementary implementation plan by assigning a Social Coordinator for construction phase who is responsible to interact and support the CLO, monitor performance of contactors 3. Ensure that EPC contractor recruits or appoints a responsible staff on social management issues such as liaison with communities, delivery of impact mitigation measures, grievance management who will work under supervision of CLO of FTA. 4. Assign responsibility for implementation of this ESAP and detailed recommendations of ESIA at management level.	Ensure that there is sufficient capacity to implement stakeholder engagement and grievance mechanism management by assigning an experienced social expert	EBRD PR 1 IFC PS 1 Good Practise	1. FTA 2. ATS 3. ATS 4. FTA 5. FTA	1. 2022 – Q4 2. 2022 – Q4 3. 2023 - Q1 4. 2023 – Q1 5. 2022 – Q4	● Employment/appointment records	

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5.	Ensure relevant personnel and financial resources are allocated by FTA at construction and operational stage for implementation of this ESAP and detailed recommendations of ESIA.						
<b>1.6</b>	<b><u>Project Monitoring and Reporting</u></b>	Compliance with local legislation and Lenders' requirements	EBRD PR1 IFC PS 1 Good Practice	1. FTA & ATS 2. ATS 3. FTA & ATS 4. ATS 5. FTA	1. During operation and construction 2. During construction 3. During operation and construction 4. 2022 - Q4 5. 2022- Q4	<ul style="list-style-type: none"> <li>● Non-compliance track lists</li> <li>● Annual Environmental and Social Monitoring Reports for operation</li> <li>● Revised template for Construction Progress Reports</li> <li>● Semi-annual Environmental and Social Monitoring Reports for construction</li> </ul>	
<b>1.7</b>	<b><u>Permitting</u></b>	Compliance with local legislation	EBRD PR1 IFC PS 1 Good Practice	1. DHMI & FTA & ATS 2. ATS 3. FTA & DHMI 4. FTA & DHMI 5. FTA & DHMI 6. FTA	1. During operation and during construction 2. 2022 – Q4 3. 2023 – Q2 4. 2023 – Q3 5. Prior to construction of new expansion of WWTP begins 6. 2022 – Q4	<ul style="list-style-type: none"> <li>● Legal Compliance Register</li> <li>● Permit Log</li> <li>● Permits and approvals</li> <li>● Groundwater use permits</li> <li>● Environmental permit</li> <li>● Temporary waste storage permit in case required</li> <li>● Environmental permit for CBPs</li> </ul>	



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1.8	<ol style="list-style-type: none"> <li>Develop and implement a grievance mechanism that includes methodology for assessment of construction impacts on affected communities especially dust impacts on greenhouses, vegetal production, housing/health conditions as well as impacts on non-agricultural businesses in close proximity to airport. The construction impacts on households, livelihoods and businesses will be recorded, assessed and mitigated. If the mitigation measures are insufficient and the grievance remain, the impact will be remedied at last resort by ATS under supervision of FTA.</li> <li>Monitor closely grievances pertaining to dust or other impacts on communities in area of influence, report regularly number of grievances resolved, together with records of assessments.</li> <li>Report on records and remedies with disaggregation of gender and vulnerable groups.</li> </ol>	Lack of a grievance mechanism within ATS is a key risk. Assessment methodology for damages to greenhouses and crops is essential to evaluate damages and compensate accordingly.	EBRDPR5 IFC PS5	<ol style="list-style-type: none"> <li>ATS</li> <li>ATS</li> <li>FTA</li> </ol>	<ol style="list-style-type: none"> <li>2022 – Q4</li> <li>During construction</li> <li>During construction</li> </ol>	<ul style="list-style-type: none"> <li>ATS Grievance mechanism</li> <li>ATS Grievance records</li> <li>FTA Grievance mechanism</li> <li>FTA Grievance records</li> <li>Construction impact assessment and remedy methodology (ATS)</li> <li>Number of consultations with PAPs</li> <li>Number of applications for damages</li> <li>Assessment and remedy records</li> <li>Grievances records on construction impacts</li> </ul>	
<b>2</b>	<b>PR2 Labour and Working Conditions</b>						
	<b>PS2 Labour and Working Conditions</b>						
2.1	<ol style="list-style-type: none"> <li>Ensure that contractors and subcontractors to develop or adapt FTA HR policies and ethical code of conduct.</li> <li>Develop and implement Contactor Management Plan covering labour issues including a specific external labour and working conditions audit.</li> <li>Conduct an external labour and working conditions audit including occupational health and safety in line with PR2 and worker accommodation guideline of IFC and EBRD by independent external labour experts to be engaged by LTA and provide outcomes and report to Lender. This audit shall be conducted at the peak time of construction and cover all contractors.</li> </ol>	Compliance with EBRD PR2/ IFC PS2 requirements.	EBRD PR2 IFC PS2	<ol style="list-style-type: none"> <li>FTA</li> <li>ATS</li> <li>FTA</li> </ol>	<ol style="list-style-type: none"> <li>2023 – Q1</li> <li>2023 – Q1 &amp; during construction and operation</li> <li>Peak of construction</li> </ol>	<ul style="list-style-type: none"> <li>HR Policies and Code of Conducts of FTA and ATS Subcontractors</li> <li>Relevant clauses in contracts</li> <li>Contractor Management Plan</li> <li>Labour and Working Conditions Audit Report</li> </ul>	

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2.2	<ol style="list-style-type: none"> <li>Revise content of induction trainings to include information on human rights, worker rights, diversity, workers' right to organisation and collective bargaining, GBVH, grievance mechanism, ethical code of conduct for both operation and construction phases.</li> <li>Ensure that general awareness training of contractor workers including inductions include adequately issues mentioned in point 1.</li> </ol>	Increasing awareness and mitigate risks related to labour rights and working conditions.	EBRD PR2 IFC PS2 GBVH Guide Labour Law (4857) Law on Trade Union and Collective Bargaining (6356)	<ol style="list-style-type: none"> <li>FTA &amp; ATS &amp; External consultants</li> <li>FTA &amp; ATS</li> </ol>	<ol style="list-style-type: none"> <li>2023 – Q1 &amp; during construction and operation</li> <li>2023 – Q1</li> </ol>	<ul style="list-style-type: none"> <li>Training presentations and training participation lists</li> <li>Construction Monitoring Reports and training records for the current workforce</li> </ul>	
2.3	Review and revise the construction employee contracts and ensure subcontractor companies employee contracts comply with Labour Law, EBRD PR2 and IFC PS2 i.e., compliance with overtime requirements, compensations. Verify these in external labour and working conditions audit.	Compliance with national Labour Law, EBRD PR2/ IFC PS2 requirements.	EBRD PR2 IFC PS2 Labour Law (4857)	ATS	2023 – Q1 & during construction	<ul style="list-style-type: none"> <li>Revised employee contracts of ATS and its subcontractors</li> <li>External Labour and Working Conditions Audit</li> </ul>	
2.4	<ol style="list-style-type: none"> <li>Develop and implement construction Subcontractor Management System with monthly subcontractor audits on working and accommodation/campsite conditions in line with IFC/EBRD Guidance on Workers' Accommodation, wages, payments and develop mechanism to prevent unregistered salary payments.</li> <li>Agree an audit template with LTA.</li> </ol>	Compliance with national Labour Law, EBRD PR2/ IFC PS2 requirements. IFC/EBRD Guidance on Workers' Accommodation Potential legal cases Maintain workplace peace	EBRD PR2 IFC PS2 Labour Law (4857)	ATS	1. & 2. 2023 – Q1 & during construction	<ul style="list-style-type: none"> <li>Subcontractor Management System</li> <li>Monthly audit template</li> <li>Furnished rooms, Photos</li> <li>Monthly Audit reports</li> <li>Payslips</li> <li>List of purchased equipment that missing</li> </ul>	
2.5	Develop and implement a comprehensive Employee Grievance Mechanism and inform all employees including subcontractors about the mechanism and encourage the workers to use for both operation and construction phase	EBRD PR2/ IFC PS2 requirements High employee engagement Proactive approach and quick responses for the problems.	EBRD PR2 IFC PS2 Guidance Note on Employee Grievance Mechanism	FTA & ATS	2023 – Q1 & during construction and operation	<ul style="list-style-type: none"> <li>Consolidated Employee Grievance System</li> <li>Grievance records</li> <li>Complaint response times</li> <li>Training records, participation lists, posters and other means of communication tools</li> </ul>	

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						<ul style="list-style-type: none"> <li>Monthly audit reports, Semi-annual monitoring report and external labour audit.</li> </ul>	
2.6	<ol style="list-style-type: none"> <li>Revise and update supplier management plan/vendor evaluation forms where needed to include evaluation of labour and human related risks including review of HR policies and ethical code/code of conduct of potential suppliers.</li> <li>Ensure clauses in contracts of suppliers or stand-alone commitments from suppliers to adhere to PR2/PS2</li> <li>In the case where the suppliers are found to be non-compliant with EPC contract, FTA will plan and deliver on site audits for primary suppliers of ongoing goods and services.</li> </ol>	<p>Compliance with EBRD PR2/ IFC PS2 requirements</p> <p>Management of third-party risks on labour rights</p>	<p>EBRD PR2</p> <p>IFC PS2</p> <p>Labour Law (4857)</p>	FTA & ATS	<ol style="list-style-type: none"> <li>&amp; 2. 2023 - Q1</li> <li>3. During operation and construction</li> </ol>	<ul style="list-style-type: none"> <li>Revised Supplier management policy/vendor evaluation forms</li> <li>Written commitments (in contracts or stand-alone declarations)</li> </ul>	
2.7	Procure panels from Green Technology Selector List up to 5 MW worth of rooftop panels installations. (Over 5MW installation should be notified to EBRD and IFC and an additional supply chain due diligence shall be conducted).	Compliance with EBRD/IFC guidance on management of SC risks in solar panel producers.	EBRD Guidance	FTA & ATS	At the stage of panel procurement	<ul style="list-style-type: none"> <li>Contract or other evidence of procurement</li> </ul>	
<b>3</b>	<b>PR3 Resource Efficiency and Pollution Prevention and Control</b>						
	<b>PS3 Resource Efficiency and Pollution Prevention</b>						
3.1	<u>Resource Efficiency</u>	Resource efficiency and pollution prevention	EBRD PR3 IFC PS3 Good Practice	<ol style="list-style-type: none"> <li>FTA</li> <li>ATS</li> <li>ATS</li> </ol>	<ol style="list-style-type: none"> <li>2023 - Q2 &amp; during operation</li> <li>&amp; 3. During construction phase</li> </ol>	<ul style="list-style-type: none"> <li>KPI tracking records for operation and construction activities</li> <li>Consumption data for operation and construction activities</li> </ul>	

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3.2	<u>Air</u>	Air emissions	EBRD PR3 IFC PS3	1. FTA 2. FTA 3. 4. & 5. ATS 6. ATS & FTA 7. & 8. FTA to initiate the process and cooperate with DHMI & fuel farm operators to undertake VOC analysis 9. FTA to initiate the process and cooperate with DHMI & fuel farm operators to undertake VOC analysis	1. During operation 2. 2022 - Q4 3. 4. 5. & 6. During construction 7. 8. & 9. 2024 -Q1	<ul style="list-style-type: none"> <li>● Emission measurement reports</li> <li>● Air Quality Management Plan for operation and construction phases</li> <li>● VOC analysis results</li> <li>● Evaluation of the effectiveness of the measures taken</li> </ul>	
	1. Measure the air emissions generated due to operation activities of the facilities and check the compliance of the results with the EBRD and IFC standards						
	2. Develop and implement an operational Air Quality Management Plan for the emissions generated by trigeneration and heating system during operation phase						
	3. Avoid any unnecessary soil moving/clearing to minimize dust during construction						
	4. Spray water to the access routes to the construction sites and unpaved project areas with water sprinklers between 07:30-18:30 hours every hour, which will be adapted to the climate conditions.						
	5. Adapt a strict maintenance program for heavy machinery and vehicles to minimize gaseous emissions, and noise during construction						
	6. In line with ESMS, control and audit contractors' performance and implementation of Air Quality and Dust Management Plan. Ensure any non-compliances are swiftly resolved in line with Environmental and Social Monitoring Plan for construction phase, conduct monthly dust emission measurements during construction phase and FTA should assure remedy is provided in case necessary actions taken by EPC contractor are found to be insufficient and any adverse impacts caused by non-compliance with the Dust Management Plan.						
	7. Ensure management procedures for operation of the new fuel farm, include measures to control VOC emissions						
	8. Audit new fuel farm operations against good international practice to limit VOC emissions.						
	9. In line with Environmental and Social Monitoring Plan for operational phase, Undertake VOC analysis at the proposed fuel farm to monitor impacts at nearby receptors and NOx, SOx and PM along access roads to the airport.						

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3.3	<u>Greenhouse Gases</u> 1. Continue to calculate and monitor GHG emissions annually in line with ACA and IFC guidance 2. Achieve and maintain certification to Airport Carbon Accreditation Level 4 (Transformation)	GHG emissions	EBRD PR3 IFC PS3	1. FTA 2. FTA	1. During Operation 2. 2027 – Q4	<ul style="list-style-type: none"> <li>GHG emission report</li> <li>Certificate of Level 4 Accreditation by an approved Level 4 and 4+ ACA verifier</li> <li>ACA Stakeholder Partnership Plan</li> <li>Disclosure of long-term absolute GHG reduction target in line with ACA Level 4 requirements</li> </ul>	
3.4	<u>Climate Change.</u> 1. Inform DHMI to consider extreme weather conditions within its operations and future projections, including for flight scheduling and payload restrictions. 2. Revise emergency planning and disaster management processes for staff, passengers and equipment to take account of increased failure rate of mechanical and electric equipment under increased maximum temperatures. 3. Improve emergency response plans, including fire protection and fire suppression systems, and evacuation measures to account for fire, smoke and thermal damage to critical infrastructure and individuals under increased risk of wildfires. 4. Develop heat management plans, including passive ventilation and identification or creation of cool refuges to be used for staff or passengers as part of first aid response to heat stress events from combined increased heat and humidity. 5. Develop inspection regimes following extreme weather events. 6. Revise contingency planning for loss of external power and communications resulting from increased storm severity. 7. Revise water resource management plan to account for increase drought risk and maximising water efficiency of the airport.	Climate Change	EBRD PR3 IFC PR3	1. FTA & DHMI 2. FTA 3. FTA 4. FTA 5. FTA & DHMI 6. FTA & DHMI 7. FTA & DHMI 8. FTA	1. 2023 – Q4 2. During operation 3. 2023 – Q1 4. 2023 – Q2 5. During operation 6. 2023 – Q1 7. During operation 8. During operation	<ul style="list-style-type: none"> <li>Emergency Response Plan</li> <li>Water Management Plan</li> <li>Heat Management Plan</li> <li>Asset Inspection Plan</li> </ul>	

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8.	Consult with other stakeholders (DHMI and airlines) on additional adaptation measures in the ESIA and pursue adoption/implementation						
<b>3.5</b>	<u>Noise</u>	Noise	EBRD PR3 IFC PS3 European Noise Directive Guidelines for Community Noise (WHO, 1999) ICAO/EU balanced approach Regulation on Assessment and Management of Environmental Noise (RAMEN)ICAO Document 9829 Guidance on the Balanced Approach to Aircraft Noise Management, 2008	1. FTA to initiate the process and cooperate with DHMI for development of the plan & DHMI to implement the plan 2. DHMI and local authorities with funding from FTA 3. ATS 4. ATS & External Consultant 5. FTA	1. 2023 - Q1 & during operation 2. 2022 – Q4 & during construction 3. During construction	<ul style="list-style-type: none"> <li>● Operational Noise Management Plan</li> <li>● Construction Noise Management Plan in place</li> <li>● Noise measurement results</li> </ul>	
<b>3.6</b>	<u>Water</u>	Reducing the risk for environmental damage as a result of water extract	EBRD PR3 IFC PS 3 Turkish Groundwater Law No. 167	1. FTA 2. FTA & ATS 3. ATS	1. During operation 2. 2023-Q1 & during construction and operation 3. 2023-Q1	<ul style="list-style-type: none"> <li>● Water Analysis results</li> <li>● Water Management Plan for construction and operation phases</li> <li>● Spill Response Plan</li> </ul>	

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3.7	<u>Wastewater</u>	Reducing the risk for environmental damage as a result of wastewater discharge	EBRD PR3 IFC PS 3	1. ATS 2. FTA 3. ATS 4. FTA 5. FTA	1. During construction 2. 2023– Q1 & during operation 3. 2022– Q4 & during construction 4. During operation 5. During operation	<ul style="list-style-type: none"> <li>● Operation Wastewater Management Plan in place</li> <li>● Revised construction Waste Management Plan in place</li> <li>● Wastewater Analysis results compared with Lender’s Environmental and Social Standards and national standards</li> </ul>	
3.8	<u>Waste</u>	Reducing the risk for environmental damage as a result of waste management	EBRD PR3 IFC PS 3 EU Waste Directive	1. FTA 2. FTA 3. ATS 4. ATS 5. FTA 6. FTA	1. 2022– Q4 & during operation 2. During operation 3. During Construction 4. During construction 5. During operation 6. 2025 – Q1	<ul style="list-style-type: none"> <li>● Operational Waste Management Plan</li> <li>● Revised construction Waste Management Plan</li> <li>● Waste logs</li> <li>● Waste KPIs</li> <li>● Audit Reports</li> </ul>	

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3.9	<u>Soil</u> 1. Ensure that all the tanks storing hazardous materials related with the activities of FTA have secondary containment structures 2. Secure hazardous material and hazardous waste compulsory liability insurance 3. Improve topsoil management practices in the construction site 4. Conduct leakage test and soil quality analysis a) before decommissioning of the fuel storage tanks around the existing fuel farm if the decommissioning is managed by FTA b) prior to further construction works if the decommissioning is undertaken by third party independent of FTA. 5. In the event that decommissioning is undertaking by the EPC Contractor, managed by FTA, The fuel farm decommissioning activities are to be undertaken in line with regulation (Number 27605) Control of Soil Pollution stemming from Single Point Resources, regulation (Number 26005) on Control of Pollution Caused by Hazardous Substances in Aquatic Environment and regulation (Number 28257) on the Protection of Groundwater against Pollution and Deterioration to avoid contamination of soil and groundwater. A decommissioning plan aligned with good international practice will be prepared and submitted for LTA review and approval. 6. Conduct soil quality analysis where there is contamination risk (old vehicle maintenance area) during construction 7. Conduct soil quality analysis prior starting the new fuel farm construction	Soil and groundwater contamination	EBRD PR3 IFC PS 3	1. FTA 2. FTA 3. ATS 4. FTA to initiate the process and cooperate with DHMI & fuel farm operators to conduct leakage test and soil quality analysis 5. ATS & DHMI 6. ATS 7. FTA	1. & 2. During operation 3. During construction 4. (a) Before decommissioning of the fuel storage tanks / (b) prior to further construction works 5. Before decommissioning of the fuel storage tanks 6. During construction 7. Prior starting the new fuel farm construction	<ul style="list-style-type: none"> <li>Records of site inspections</li> <li>Hazardous material Inventory</li> <li>Secondary containment structures established</li> <li>Hazardous materials liability insurance</li> <li>Soil quality analysis reports</li> </ul>	
<b>4</b>	<b>PR4 Health and Safety PS4 Community Health, Safety, and Security</b>						
4.1	<u>General HSE Management</u> 1. Establish site HSE audit procedure for operation phase 2. Continue to conduct regular HSE audits during construction and operation	Effective non-compliance and action tracking system	EBRD PR4 IFC PS4 GIIP	1. FTA 2. FTA & ATS	1. 2023 – Q1 2. During construction and during operation	<ul style="list-style-type: none"> <li>HSE audit procedure and plan including a dedicated site audit forms</li> <li>HSE audit records</li> </ul>	



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4.2	<p><u>Community Health and Safety</u></p> <ol style="list-style-type: none"> <li>Carry out community health and safety and security risk assessment for operation of the expansion project</li> <li>Revise and implement a community health and safety management plan (CHSP) for constructions and operations</li> <li>Provide health awareness trainings to all employees, inclusive of cleanliness, sexually transmitted diseases (STDs) and other communicable and vector-borne diseases, etc.</li> </ol>	<p>Community Safety</p> <p>Effective management of risk associated with increase in the traffic</p>	<p>EBRD PR4</p> <p>IFC PS4</p>	<ol style="list-style-type: none"> <li>FTA</li> <li>FTA</li> <li>ATS</li> </ol>	<ol style="list-style-type: none"> <li>2023 – Q2 &amp; during operation</li> <li>2023 – Q1 &amp; during operation</li> <li>During the construction</li> </ol>	<ul style="list-style-type: none"> <li>Community health and safety risk assessment</li> <li>Revised Community health and safety plan</li> <li>Health awareness training</li> </ul>	
4.3	<p><u>Infrastructure, Building, Equipment Design and Safety</u></p> <ol style="list-style-type: none"> <li>Design the airport in compliance with the "Regulation on Protection of Buildings from Fire" and internationally accepted life and fire standards (NFPA standards, IBC Codes and EN standards)</li> <li>Conduct a third-party Life and Fire Safety Audit for operation phase</li> <li>Conduct a leak test for the rooms equipped with gas suppression systems for fire-fighting purposes.</li> <li>Establish a periodical checklist and monitor the fire extinguishing system to check the fire extinguishing system is effectively functioning</li> <li>Update the list of the grounding and lightning controls ensure annual periodical controls.</li> <li>Establish an inventory regarding tools and equipment where the routine visual inspections and legally required periodical tests can be tracked for both operation and construction phases.</li> <li>Establish a labelling system in parallel to the IDs provided in the tools and equipment inventory for operation and construction phases.</li> <li>Ensure that tools and equipment lists to track the periodical tests and periodical checks for construction are established. ATS has to also ensure their contractors and subcontractors to list and track the tools and equipment brought by themselves.</li> </ol>	<p>To demonstrate that the design needs fire and safety requirements</p> <p>To ensure fire extinguishing gas suppression systems are effectively functioning</p> <p>To ensure grounding and lightning systems are effectively functioning</p> <p>To ensure tools and equipment are safe for use of workers</p>	<p>EBRD PR4</p> <p>IFC PS4</p>	<ol style="list-style-type: none"> <li>FTA &amp; ATS &amp; External Consultant</li> <li>FTA</li> <li>FTA</li> <li>FTA</li> <li>FTA &amp; ATS</li> <li>FTA &amp; ATS</li> <li>ATS</li> <li>ATS</li> </ol>	<ol style="list-style-type: none"> <li>2023– Q1</li> <li>2025– Q1</li> <li>2023– Q1</li> <li>2023 – Q1 &amp; during operation</li> <li>2022– Q4</li> <li>6 &amp; 7. During operation and construction</li> <li>During construction</li> </ol>	<ul style="list-style-type: none"> <li>Design certification/Life and Fire Safety Master Plan</li> <li>Third-party Life and Fire Safety Audit Report</li> <li>Gas suppression systems effectively in use</li> <li>Up to date lists of grounding and lightning systems</li> <li>Tools and equipment inventory</li> <li>Labelling of tools and equipment</li> </ul>	

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4.4	<p><u>Hazardous Materials Safety</u></p> <ol style="list-style-type: none"> <li>In line with ESMS, conduct a hazardous material safety audit for construction and operation phases</li> <li>Develop and implement a site-specific Hazardous Materials Management Plan for construction phase.</li> <li>Develop and implement a site-specific Hazardous Materials Management Plan for operation phase.</li> <li>Decision to be made at a later stage if hazardous materials management plan will cover new fuel farm operations or will these be managed under separate plans.</li> </ol>	To ensure safe working conditions are provided for workers	EBRD PR4 IFC PS4	<ol style="list-style-type: none"> <li>FTA &amp; ATS</li> <li>FTA &amp; ATS</li> <li>FTA</li> <li>FTA</li> </ol>	<ol style="list-style-type: none"> <li>2023 – Q1</li> <li>2022 – Q4 &amp; during construction and operation</li> <li>&amp; 4. Prior to operation</li> </ol>	<ul style="list-style-type: none"> <li>Audit records and noncompliance and action tracking list</li> <li>Hazardous Materials Management Plan</li> </ul>	
4.5	<p><u>Traffic and Road Safety</u></p> <ol style="list-style-type: none"> <li>Apply the safe tipping procedure provided in the traffic management plan for trucks during construction</li> <li>Establish fuelling locations at each construction zone or at least to provide adequate spill prevention measures during fuelling activities.</li> <li>Develop and implement road safety awareness campaign targeting school aged children at sensitive receptors as identified in the ESIA. Undertake at least one road safety event / workshop at each identified school annually.</li> <li>Update contractor’s traffic management plan to include the grievance procedure on speeding and other construction traffic related risks to communities.</li> <li>Develop and implement site-specific Traffic Management Plan for operation phase in coordination with DHMI’s Traffic Management Plan</li> <li>Consult with tourism businesses and relevant stakeholders to provide informed solutions on parking i.e. smart parking solutions (online advanced booking and parking management systems).</li> <li>As part of the process of achieving level 4 airports carbon accreditation, develop and agree a plan for increase in public transportation services as a measure to limit emissions and traffic impacts.</li> </ol>	To ensure traffic and road safety	EBRD PR4 IFC PS4	<ol style="list-style-type: none"> <li>ATS</li> <li>ATS</li> <li>FTA</li> <li>ATS</li> <li>FTA &amp; DHMI</li> <li>FTA</li> <li>FTA</li> </ol>	<ol style="list-style-type: none"> <li>During construction</li> <li>During construction</li> <li>2023 – Q1</li> <li>2023 - Q1 &amp; during operation</li> <li>During operation</li> <li>During operation</li> </ol>	<ul style="list-style-type: none"> <li>Traffic Management Plans</li> <li>Training records</li> <li>Grievance records</li> <li>Traffic safety campaign records</li> <li>Near miss and accident/incident records</li> <li>Instructions for fuelling of on-site equipment</li> </ul>	

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4.6	<p><u>Natural Hazards</u></p> <ol style="list-style-type: none"> <li>Ensure that all the cabinets, shelves and heavy items are fixed to either to the floor and/or to the side walls for both construction and operation phases</li> <li>Ensure to collect/drain surface waters so that flood risk is prevented and ensure to take drainage and insulation measures due to the uncontrolled filling of the area before and during the construction of the expansion area.</li> <li>Design the Project in accordance with Earthquake Regulation</li> </ol>	To ensure safety in case of an earthquake	EBRD PR4 IFC PS4	<ol style="list-style-type: none"> <li>FTA &amp; ATS</li> <li>ATS</li> <li>ATS</li> </ol>	<ol style="list-style-type: none"> <li>&amp; 2. 2023 – Q1 and during construction and operation</li> <li>2023 – Q1</li> </ol>	<ul style="list-style-type: none"> <li>Evaluation of effectiveness of the measures taken to fix the items on-site</li> <li>Design Conformity Report for earthquake</li> </ul>	
4.7	<p><u>Emergency Preparedness and Response</u></p> <ol style="list-style-type: none"> <li>Update and implement the Emergency Response Plan for both construction and operation phases</li> <li>Prepare and make available to Emergency Response Services a list of disabled employees after they are informed, and their consent is taken on sharing their personal data with Emergency Response Services</li> <li>Conduct emergency drills / exercises against various scenarios identified in the emergency response plan during construction and operation phases. Involve and coordinate with local emergency response services.</li> <li>Increase the number of first aiders to the numbers stated below for both construction and operation: <i>Operation:</i> one first aider for every 20 employees <i>Construction:</i> one first aider for every 10 employees</li> </ol>	To ensure effective emergency preparedness and response management	EBRD PR4 IFC PS4	<ol style="list-style-type: none"> <li>FTA &amp; ATS</li> <li>FTA</li> <li>FTA &amp; ATS</li> <li>FTA &amp; ATS</li> </ol>	<ol style="list-style-type: none"> <li>&amp; 2. 2022 – Q4 &amp; during construction and operation</li> <li>2023 - Q1 &amp; during construction and operation</li> <li>2023 – Q1</li> </ol>	<ul style="list-style-type: none"> <li>Revised Emergency Response Plans</li> <li>Information provided to rescue teams</li> <li>Annual HSE Drill Plan and Records of drills</li> <li>First aiders list</li> </ul>	
4.8	<p><u>Accidents and Incidents</u></p> <ol style="list-style-type: none"> <li>Establish a single-track list for incidents/accidents separately for construction and operation</li> <li>Enhance the classification of incidents/accidents for construction and operation</li> <li>Improve near miss reporting by raising awareness of employees, making available hard copy near miss forms for construction and operation</li> <li>Establish an incident/accident procedure for construction and operation</li> </ol>	To ensure effective management of accident reporting and evaluation of preventive and protective measures	EBRD PR4 IFC PS4	1, 2, 3 & 4. FTA & ATS	1., 2., 3. & 4. 2023 – Q1 & during construction and operation	<ul style="list-style-type: none"> <li>Accident/incident procedure</li> <li>Accident and near miss tracking list</li> </ul>	

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4.9	<p><u>Risk Assessment</u></p> <ol style="list-style-type: none"> <li>Conduct risk assessments prior to start of any work step</li> <li>Update the risk assessments to include site-specific risks (area-based hazard identification and risk evaluation) for construction.</li> <li>Conduct a specific risk assessment study and monitor for the maintenance activities at the waste press/packaging machine at waste segregation facility operated by Antçev</li> </ol>	Effective management of site-specific risks	EBRD PR4 IFC PS4	<ol style="list-style-type: none"> <li>ATS</li> <li>FTA</li> <li>FTA &amp; ANTÇEV</li> </ol>	<ol style="list-style-type: none"> <li>2023– Q1 &amp; during construction</li> <li>2022– Q4 &amp; during operation</li> <li>2022– Q4</li> </ol>	<ul style="list-style-type: none"> <li>Revised risk assessments</li> </ul>	
4.10	<p><u>Safe Systems of Work</u></p> <ol style="list-style-type: none"> <li>Establish and implement a permit to work procedure and related permit forms, such as working at height, hot works, confined space work, excavation works and a LOTO procedure for operation and construction phases</li> <li>Establish a hot work permit including a post control at the work area 30 minutes following completion of hot work.</li> <li>Establish physical barriers for the vertical ladders to limit the access/use of them without a permit.</li> <li>Adapt a control tag and a short checklist for visual checks for ladders.</li> </ol>	Provision of safe systems of work	EBRD PR4 IFC PS4	<ol style="list-style-type: none"> <li>FTA &amp; ATS</li> <li>FTA</li> <li>FTA</li> <li>FTA</li> </ol>	<ol style="list-style-type: none"> <li>2022– Q4 &amp; during construction and operation</li> <li>2., 3. &amp; 4. 2023 – Q1</li> </ol>	<ul style="list-style-type: none"> <li>Permit to work procedures</li> <li>Permit forms</li> <li>Completion of physical barriers for vertical ladders</li> </ul>	
4.11	<p><u>Trainings</u></p> <p>Establish employee-based training attendances tracking lists including vocational training records for both operation and construction</p>	Ensure legally required training and job-specific/vocational training is defined	EBRD PR4 IFC PS4	FTA & ATS	2023 – Q1	<ul style="list-style-type: none"> <li>Training lists</li> <li>Training track lists</li> </ul>	
4.12	<p><u>HS Meetings</u></p> <p>Establish HS Committee members list in line with Article 6 of the regulation and conduct monthly meetings</p>	To comply with the legal requirement	EBRD PR4 IFC PS4	FTA & ATS	During construction and operation	<ul style="list-style-type: none"> <li>HS Committee Meeting Minutes</li> </ul>	
4.13	<p><u>Medical Surveillance</u></p> <ol style="list-style-type: none"> <li>Establish a track list and follow-up periodical medical inspections and key performance indicators for construction and operation phases.</li> </ol>	To ensure health and safety and wellbeing	EBRD PR4 IFC PS4	<ol style="list-style-type: none"> <li>FTA &amp; ATS</li> <li>FTA &amp; ATS</li> </ol>	<ol style="list-style-type: none"> <li>2023– Q1 &amp; during construction and operation</li> </ol>	<ul style="list-style-type: none"> <li>Medical surveillance track list</li> </ul>	

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2.	Review the operation and construction contractors and subcontractors' medical surveillance program in place (especially the waste collection and segregation contractor)				2. 2023– Q1 & during construction and operation		
<b>4.14</b>	<u>Process Safety</u>	Fire and explosion risks	EBRD PR4 IFC PS4 Regulation on the Protection of the Employees from the Dangers of Explosive Atmospheres Regulation on the Equipment to be Used in Explosive Atmospheres Regulation on the Protection of the Buildings from Fire Regulation on the Prevention of Major Industrial Accidents and the Mitigation of Their Effects	1, 2, 3, 4, 6 & 7 FTA to initiate the process and cooperate with DHMI & fuel farm operators 5. ATS & External consultant (geologist/hydrogeologist and process safety engineers)	1. 2023 – Q2 2. Before commissioning of the new tanks 3. 2023- Q3 4. 2022-Q4 5. 2023-Q1 6. Prior to commissioning of the new fuel farm and at operation 7. 2023 – Q1 8. Prior to commissioning of the new fuel farm and at operation 9. Prior to commissioning of the new fuel farm and at operation	<ul style="list-style-type: none"> <li>● Safety Report</li> <li>● Major Accident Prevention Policy</li> <li>● Explosion Protection Document</li> <li>● Major Accident Scenario Document</li> <li>● BEKRA Notification Screenshot</li> <li>● Explosion Protection Document</li> <li>● ATEX Equipment Conformity Reports</li> <li>● ATEX Equipment Maintenance Records</li> <li>● Test Control Inspection Report</li> <li>● Audit Report</li> <li>● Geotechnical Report</li> <li>● Process Safety Report</li> <li>● Emergency Plan for fuel Farm</li> <li>● Established sprinkler systems</li> </ul>	
<b>4.15</b>	<u>Industrial Hygiene</u>	To ensure health and safety and wellbeing	EBRD PR4 IFC PS4	1. FTA & ATS 2. FTA 3. FTA	1. During construction and operation 2. 2023– Q1	<ul style="list-style-type: none"> <li>● Indoor environmental quality monitoring and personal exposure monitoring programme</li> </ul>	

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	<ol style="list-style-type: none"> <li>2. Review and revise the measurement locations as per the latest risk assessment studies and repeat the measurements for the locations that were reported as non-compliant in the measurement studies in 2013.</li> <li>3. Request Antçev to revise their existing risk assessment studies related to the PPE needs and review it for completeness and effectiveness.</li> </ol>				3. 2023– Q1	<ul style="list-style-type: none"> <li>● Indoor and personal exposure measurement reports</li> <li>● Measurement track list</li> <li>● Records of preventive and protective measures</li> </ul>	
<b>4.16</b>	<p><u>Disabled People</u></p> <p>FTA to develop disable access and facilities strategy and incorporate the findings into the new expansion project design. Consideration of number and location of toilets, parking spaces, walking distances reserved seating points, access through security, help points, facilities for hearing and sight impaired airport users, information provision via website</p>	The airport is accessible to all users including staff and passengers	EBRD PR4 IFC PS4 Turkish Law No 5378 on Disabled People	FTA	During design and prior to construction	<ul style="list-style-type: none"> <li>● FTA to demonstrate that the design allows for disabled access to all areas of the airport</li> </ul>	
<b>4.17.</b>	<p><u>Security and Human Rights</u></p> <p>Monitor and report on certification and training of security staff as per national legislation and voluntary principles on security and human rights. Provide additional trainings on human rights, communication, incident/crowd management, GBVH in addition to regular certification requirements.</p>	Human rights risks management on security operations	EBRD PR4 Voluntary Principles on Security and Human Rights	FTA/Security Contractor	During construction and operation	<ul style="list-style-type: none"> <li>● Training records</li> <li>● LTA monitoring report</li> </ul>	
<b>5</b>	<b>PR5 Land Acquisition, Involuntary Resettlement and Economic Displacement</b>						
	<b>PS5 Land Acquisition and Involuntary Resettlement</b>						
<b>5.1</b>	<p>Develop a detailed supplementary livelihood improvement Plan (SLIP) for corrective actions (CAP) agreed in land acquisition audit report:</p> <ol style="list-style-type: none"> <li>1. Agree on draft TOR for the plan</li> <li>2. Recruit adequately qualified consultants to develop the plan</li> <li>3. Consultants to mobilise on site</li> <li>4. Plan is completed and agreed by Lenders</li> </ol>	Implementation of the corrective actions to bridge the gaps between international standards and local legislation through the SLIP.	EBRD PR5 IFC PS5	FTA & External consultants	<ol style="list-style-type: none"> <li>1. 2022 – Q4</li> <li>2. 2023-Q1</li> <li>3. 2023 Q1</li> <li>4. 2023 – Q2</li> </ol>	<ul style="list-style-type: none"> <li>● TOR agreed for SLIP</li> <li>● Consultant agreement and site mobilisation</li> <li>● SLIP</li> </ul>	
<b>5.2</b>	<p>Implement the SLIP and monitor results through</p> <ol style="list-style-type: none"> <li>1. Disclosure and consultations with PAPs</li> <li>2. Ensure support and prioritisation of vulnerable people as identified in the plan</li> <li>3. Monitor and report on progress by FTA/implementing consultant as agreed in M&amp;E section of plan</li> </ol>	Improvement of PAPs' overall housing/living conditions and livelihoods, provision	EBRD PR5 IFC PS5	FTA	<ol style="list-style-type: none"> <li>1. 2023 – Q1</li> <li>2., 3.and 5. 2023-2024</li> <li>4. Quarterly in 2023 and 2024</li> </ol>	<ul style="list-style-type: none"> <li>● Repayment cases completed</li> <li>● Number of beneficiaries of housing and livelihood improvement activities as per implementation plan including gender</li> </ul>	

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4.	LTA to conduct quarterly monitoring and a completion audit and report to Lenders	of support to vulnerable groups.				and vulnerability disaggregated data	
5.	Implement an effective grievance mechanism to manage grievances related to delivery of the plan.					<ul style="list-style-type: none"> <li>Number of consultations held</li> <li>Grievance records and closure</li> </ul>	
<b>8</b>	<b>PR8 Cultural Heritage PS8 Cultural Heritage</b>						
8.1	<ol style="list-style-type: none"> <li>Ensure that registered cultural properties (Water channels and ancient quarry) are excluded from construction works and are protected. Update construction plans and masterplan accordingly.</li> <li>Hold tailored consultations with Antalya Regional Council for the Protection of Cultural Property on mitigation measures and further instructions for registered cultural property during disclosure.</li> </ol>	Compliance with IFC PS8 and EBRD PR8	EBRD PR8 IFC PS8 Law on Conversation of Cultural and Natural Assets (2863) ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, 2011	FTA &ATS	2022 – Q4	<ul style="list-style-type: none"> <li>Updated construction plans and project master plan</li> <li>Meeting minutes/reports shared with lenders</li> </ul>	
8.2	<ol style="list-style-type: none"> <li>Develop and implement a Cultural Heritage Management Plan and a Chance Finds Procedure for construction and operation phases</li> <li>Provide training for employees on Cultural Heritage Management Plan and Chance Find Procedure at periodic intervals.</li> </ol>	Compliance of the plan and procedure to be prepared with the relevant legal regulations and the standards of IFC PS8 and EBRD PR8.	EBRD PR8 IFC PS8 Law on Conversation of Cultural and Natural Assets (2863) ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, 2011	FTA &ATS	<ol style="list-style-type: none"> <li>2023- Q1 and during construction and operation</li> <li>During construction</li> </ol>	<ul style="list-style-type: none"> <li>Cultural Heritage Management Plan</li> <li>Chance Find Procedure</li> <li>Training content and records</li> </ul>	

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8.3	Procure consultancy on cultural heritage during construction phase to supervise the earthwork operations	Compliance of the plan and procedure to be prepared with the relevant legal regulations and the standards of IFC PS8 and EBRD PR8.	EBRD PR8 IFC PS8 Law on Conversation of Cultural and Natural Assets (2863) ICOMOS Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, 2011	ATS & External expert	During construction	<ul style="list-style-type: none"> <li>Agreement between consultancy firm and ATS</li> <li>Bi-annual progress reports</li> </ul>	
<b>10</b>	<b>PR10 Information Disclosure and Stakeholder Engagement</b>						
10.1	<ol style="list-style-type: none"> <li>1. Disclose stakeholder engagement plan and make SEP and other documentation i.e. brochures, leaflets, posters, complaint forms available through online resources and communal places such as muhtar offices, municipalities, office of CLO.</li> <li>2. Deliver disclosure and construction period engagement activities and consultations to improve information disclosure and engagement of stakeholders as per SEP. Inform and promote project grievance mechanism actively. Record activities, PAPs reached and feedback provided as well as complaints effectively. (Gender and vulnerable people disaggregation to be ensured in records).</li> <li>3. Recruit a CLO and provide contact details to communities in area of influence to be in regular with communities.</li> <li>4. Monitor the implementation of the Stakeholder Engagement Plan (SEP) prepared for the Project in line with the Lenders' social requirements and standards. Revise SEP when needed and report on outcomes and progress.</li> </ol>	Appropriate consultation and information disclosure to communities, stakeholders and workers on issues that could potentially affect them during construction	EBRD PR10 IFC PS1	FTA (ATS community liaison contact to be engaged)	During construction	<ul style="list-style-type: none"> <li>SEP</li> <li>Records of disclosed information, SEP, documents/brochures etc.</li> <li>Meeting minutes, attendance lists</li> <li>Stakeholder engagement log</li> <li>Complaints registry log</li> <li>LTA monitoring reports, annual E&amp;S reports</li> <li>Contractor monitoring and audit reports</li> </ul>	
10.2	Update the stakeholder list and SEP operation phase and disclose appropriately.	Effective information disclosure and consultation in compliance with EBRD PR10 and IFC PS1.	EBRD PR10 IFC PS1	FTA	During operation	<ul style="list-style-type: none"> <li>Detailed stakeholder list</li> <li>SEP disclosed</li> </ul>	



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10.3	Implement the grievance mechanism, as described in the Stakeholder Engagement Plan. The grievance mechanism will be communicated to all internal and external stakeholders including workers of the companies within the airport and construction site/ATS workers	Availability of an environment in which people affected by the Project can raise their concerns and complaints and these are handled in a systematic manner.	EBRD PR10 IFC PS1, PS2	FTA & ATS	During construction and operation	<ul style="list-style-type: none"> <li>● Stakeholder Engagement Plan</li> <li>● Copy of Grievance Mechanism provided to the Lenders</li> <li>● Grievance log (gender disaggregated)</li> <li>● LTA monitoring reports</li> <li>● Semi-annual and annual E&amp;S reports</li> </ul>	
<b>11. Gender Smart Specific Actions</b>							
GS.1.	<ol style="list-style-type: none"> <li>1. Build capacity of contractors on inclusive procurement to implement female workforce targets in future contracting relationships, e.g. by developing an internal policy or guidance document on how to integrate gender equality considerations into procurement activities, especially in security contractor.</li> <li>2. Improve safe working environment for women both for FTA employees and contractors such as improvement of safety and conditions of women changing rooms, rest rooms/nursing rooms. Ensure availability of women toilets as appropriate. Continue assurance of home transfer for women for night shifts and late night overwork expanding it to contractor employees. Include these measures in contractor management plan and monitor compliance in monthly contractor audits.</li> </ol>	Equal access to employment and skills	EBRD PR2/IFC PR2	FTA & ATS	During construction and operation	<ul style="list-style-type: none"> <li>● Equality policy/guidance</li> <li>● Monthly contractor audit reports</li> <li>● LTA monitoring reports</li> <li>● Annual E&amp;S reports</li> <li>● Employment figures with gender disaggregation</li> </ul>	
GS.2	<ol style="list-style-type: none"> <li>1. Develop a GBVH policy/guidance building on relevant clauses in Ethical Code of Conduct in line with EBRD and IFC Joint Guidance on GBVH for Private Sector</li> <li>2. Appoint GBVH focal points to receive trainings on GBVH and deliver GBVH trainings on the policy developed and increase awareness on GBVH among all staff and complaint mechanism. Contractors, especially security contractor to be covered in trainings.</li> </ol>	Prevention of GVBH	EBRD PR4 EBRD and IFC Joint guidance on GBVH for Private Sector	FTA	1.& 2. 2023- Q1 3.2023 – Q1 4.,5. & 6. during construction and operation	<ul style="list-style-type: none"> <li>● GBVH policy</li> <li>● Updated induction and HR training contents</li> <li>● Training records</li> <li>● LTA monitoring reports and external labour audit report</li> </ul>	

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3.	Update and revise content of inductions and HR trainings for employees of FTA and contractors to disclose GBVH Policy and raise awareness on Ethical code of conduct among employees.						
4.	Promote help lines/emergency lines in the airport for GBVH complaints and incidents.						
5.	Appoint specially trained complaints handling staff for GBVH complaints who can handle such complaints in a safe and confidential way.						
6.	Monitor GBVH complaints and report on resolution to Lenders through semi-annual and annual monitoring reports.						

