



FRAPORT TAV
ANTALYA TERMINAL MANAGEMENT C.O.



**Environmental and Social
Management Plan**

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1. Introduction

1.1 Background

Fraport AG Frankfurt Airport Services Worldwide and TAV Havalimanları Holding A.Ş. Joint Venture (“Sponsor”) has been awarded the tender of Antalya Airport (“AYT”) operation for 25 years between 2027 and 2051. The Joint Venture will ensure to increase the capacity of AYT and obtain a new concession for operation.

Financing is provided by The European Bank for Reconstruction and Development (the “EBRD”), International Financial Corporation (“IFC”), Asian Infrastructure Investment Bank (AIIB) and Deutsche Investitions- und Entwicklungsgesellschaft (DEG) jointly “the Lenders”.

The currently used passenger terminals and associated facilities are operated by Fraport TAV Antalya Terminal İşletmeciliği A.Ş (FTA1) under a concession until January 1, 2027. As ongoing construction works of the expansion of Terminal 2 (T2) and Domestic Terminal by Fraport TAV Antalya Yatırım Yapım ve İşletme A.Ş. (FTA2) are completed in the beginning of 2025, the terminals are being operated by FTA until the beginning of 2027. After January 1, 2027, FTA1 and FTA2 will merge and operate the terminals.

The Environmental and Social Management Plan (ESMP), which complements the ESIA, has been prepared by FTA 1 in line with the requirements of the Lenders.

1.2 Overview and Purpose of the ESMP

This document describes the framework to establish the ESMP for the Antalya Airport operations. ESMP addresses the impacts which is given in the Environmental and Social Impact Assessment by outlining plans and their contents, for managing these issues.

The objective of the plans outlined in the ESMP is to ensure a consistent approach towards the identification, control, management and reduction of environmental and social (E&S) risks and impacts associated with the operation of the following components:

- Terminals (T1, T2, Domestic, T4),
- Car Parks,
- GAT/CIP Terminal,
- Landscaping Works,

Aerial Plan of the Project is given below.

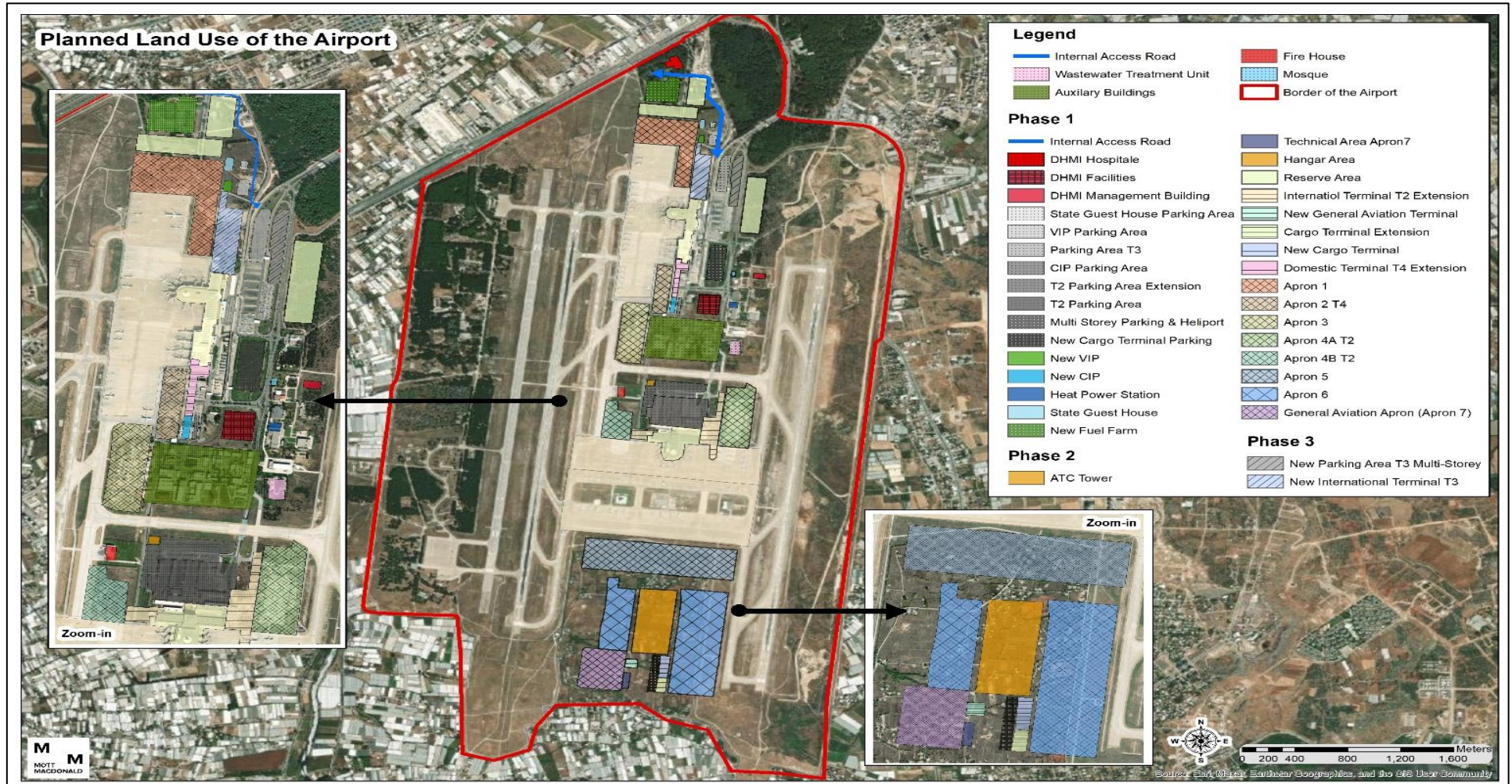


Figure 1-1: Aerial Plan of the Project

In the ESMP, consolidated monitoring and mitigation requirements are provided in line with ESIA report. The ESMP now focuses primarily on the operations phase of the Antalya Airport . It establishes a comprehensive framework under which FTA, as the operational entity develops and implements standalone mitigation and monitoring plans aligned with operational realities.

As Phase II construction activities will start, this OESMP will be revised once the Environmental and Social Assessment of Phase II activities has been completed and the Construction ESMP (CESMP) has been prepared prior to construction activities. The revision will incorporate key environmental and social risks and impacts and outline how FTA will ensure the effective implementation of mitigation measures.

This ESMP has been developed to comply with all national laws, PS/PR Requirements as well as good international industry practice (GIIP) including the implementation of the Environmental and Social Action Plan (ESAP). The overarching reference laws and standards applied are:

International

- Applicable International Civil Aviation Organization (ICAO) occupational and public safety requirements for aerodromes
- EBRD Environmental and Social Policy and Performance Requirements (PR) (2019)
- Directive 2011/92/EU and Directive 2014/52/EU amending the EIA Directive 2011/92/EU
- EU Council Directive 2008/98/EC (Waste Framework Directive) on waste and repealing certain Directives (2008)
- EU Council Directive 2010/75/EU on industrial emissions (2010)
- EU Council Directive 2012/18/EU (Seveso-III) on the control of major-accident hazards involving dangerous substances, amending and subsequently repealing Council Directive 96/82/EC (2012)
- EU Council Directive 89/391/EEC (The OHS Framework Directive) on the introduction of measures to encourage improvements in the safety and health of workers at work (1989)
- Directive 91/271/EEC on Urban Wastewater Treatment and Directive 98/15/EEC amending Directive 91/271/EEC or Groundwater Directive (GWD) 2006/118/EC
- Regulation (EU) No 598/2014 of the European Parliament and of the Council of 16 April 2014 on the establishment of rules and procedures with regard to the introduction of noise-related operating restrictions at Union airports within a Balanced Approach and repealing Directive 2002/30/EC
- European Commission Environmental Impact Assessment (EIA) Guidelines
- ICAO Guidelines for States Concerning the Management of Communicable Disease Posing a Serious Public Health Risk
- ICAO Guidance on Environmental Assessment of Proposed Air Traffic Management Operational Changes (2014)
- ICAO Noise Abatement Operational Procedures
- ICAO Guidance on the Balanced Approach to Aircraft Noise Management
- ICAO Airport Air Quality Manual (2011)
- ICAO Technical Instructions for the Safe Transport of Dangerous Goods by Air
- IFC Performance Standards (PSs) on Environmental and Social Sustainability (2012)

UN Model Regulations on the Transport of Dangerous Goods, 2023 Edition

EU Green Deal Implementation Guidance, 2023

IFC Good Practice Note on Managing Risks Associated with Modern Slavery, 2023

- IFC Sustainability Framework (updated in 2012)
- World Bank Group Environmental, Health, and Safety General Guidelines (EHS General Guidelines) (2007)
- World Bank Group Environmental, Health, and Safety Guidelines for Airports (2007)
- IFC Good Practice Handbook on the Use of Security Forces: Assessing and Managing Risks and Impacts (2017)
- Worker's accommodation: process and standards – Guidance Note by IFC and the EBRD (2009)
- IFC Good Practice Note: Managing Contractor's Environmental and Social Performance (2017)
- Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector (July,2020)
- UN Model Regulations on the Transport of Dangerous Goods, 2021

National

- Environmental Law (2872)
- Regulation on Environmental Impact Assessment
- Regulation on Environmental Permit and License
- Regulation on Environmental Audit
- Workplace Opening and Permit Regulation
- Regulation on Assessment and Management of Environmental Noise
- Regulation on Prevention and Mitigation of Major Industrial Accidents
- Regulation on Soil Pollution Control and Point-Source Contaminated Sites
- Water Pollution Control Regulation
- Regulation on Wastewater Discharges to Sewerage System
- Regulation on the Protection of Groundwater against Pollution and Deterioration
- Regulation on Control of Pollution Caused by Hazardous Substances in Aquatic Environment
- Regulation on the Transport of Dangerous Goods by Air Transportation
- Industrial Air Pollution Control Regulation
- Regulation on the Control of Air Pollution caused by Heating
- Regulation on Assessment and Management of Air Quality
- Regulation on Greenhouse Gas Emissions
- Regulation on Ozone Depleting Substances
- Regulation on Fluorinated Greenhouse Gases
- Regulation on Waste Management
- Regulation on Zero Waste

- Regulation on Landfill of Waste
- Regulation on Control of Waste Oils
- Regulation on Control of Polychlorinated Biphenyls and Polychlorinated Terphenyls
- Regulation on Control of Packaging Waste
- Regulation on the Control of End-of-life Tires
- Regulation on Control of End-of-Life Vehicles
- Regulation on Control of Waste Vegetable Oils
- Regulation on Control of the Waste Batteries and Accumulators
- Regulation on Control of Waste Electrical and Electronic Appliances
- Regulation on Control of Excavation, Construction and Demolition Waste
- Regulation on the Control of Odorous Emissions
- Regulation on Energy Efficiency in Buildings
- Regulation on Increasing Efficiency in the Use of Energy Sources and Energy
- Regulation Concerning Exploitation of Trees and Shrubs on Private-registered Immovables not Regarded as Forest
- Groundwater Law (167)
- Watershed Protection and Control Regulation
- Labour Law (4857)
- Law on Trade Union and Collective Bargaining (6356)
- Law on Public Servants (657)
- Regulation on Working Duration Related to Labour Law
- Regulation on Excess Work and Work in Excess Periods related to Labour Law
- Regulation on Special Principles in Works Carried out by Employing Workers in Shifts
- Regulation on Minimum Wage
- Regulation on Suspension of Work in Workplaces
- Law on Public Tenders (4734)
- Law on Public Tender Agreements (4735)
- Occupational Health and Safety Law (6331)
- Occupational Health and Safety Services Regulation
- First Aid Regulation
- Regulation on Occupational Health and Safety in Construction Works
- Regulation on the Procedures and Principles of the Employee's Health and Safety Trainings
- Regulation on Occupational Health and Safety Committees
- Regulation on Occupational Health and Safety Risk Assessment
- Regulation on Duties, Authority, Responsibilities and Trainings of Occupational Health and Safety Specialists
- Regulation on Duties, Authority, Responsibilities and Trainings of On-site Doctor and Other Health Personnel
- Regulation on Occupational Health and Safety in Temporary or Fixed Term Employment

- Regulation on Environmental Noise Emission Generated by the Outdoor Equipment Used at Site
- Exhaust Gas Emission Control Regulation
- Türkiye Earthquake Regulation for Buildings
- Road Traffic Regulation
- Law on People with Disabilities (5378)
- Regulation on Accessibility Monitoring and Auditing
- Regulation on the Health and Safety Measures to be taken in Workplace Buildings and Additions
- Regulation on Protection of Buildings from Fire
- Regulation on the Protection of the Workers against Risks Relevant to Noise
- Regulation on the Protection of the Workers against Vibration Risks
- Regulation on the Control of Dust Emissions
- Regulation on the Protection of Workers from the Dangers of the Explosive Media
- Regulation on the Emergency Situations in Workplaces
- Regulation on Health and Safety Measures in Working with Chemical Substances
- Regulation on Health and Safety Measures for Working with Carcinogenic and Mutagenic Substances
- Regulation on Use of Personal Protective Equipment in Workplaces
- Regulation on the Works in Which Workers shall Work Maximum Seven and Half Hours or Less in a Day in Terms of Health Rules
- Regulation on Safety and Health Signs
- Regulation on Manual Handling
- Regulation on Radiation Safety
- Regulation on Road Transportation of Hazardous Materials
- Regulation on Registration, Evaluation, Permission and Restriction of Chemicals
- Regulation on the Classification, Labelling and Packaging of Substances and Mixtures
- Law on Expropriation (2942)
- Zoning Law (3194)
- Law on Right to Information (4982)
- Law on Preservation of Personal Data (6698)
- Regulation on the Principles and Procedures for Enforcement of the Law on the Right to Information
- Law on Use of the Right to Petition (3071)
- Law on the Conservation of Cultural and Natural Assets (2863)
- Public Health Law (1593)
- Law on Protection of Family and Prevention of Violence against Women (6284)
- Regulation on Ensuring Security, Executing Duties and Services at Civil Airports, Ports and Border Gates

- Regulation on Security Measures Regarding General Aviation Air Transport
- Law on Private Security Services (5188)
- Regulation on Implementation of the Law on Private Security Services
- Airports Ground Services Regulation
- Law on Metropolitan Municipalities (5126)
- Law on Municipalities (5393)

1.3 Scope of ESMP

The ESMP focuses primarily on the operations phase of the Antalya Airport. It outlines the environmental and social management requirements for FTA as the operational entity responsible for the implementation and oversight of the Environmental and Social Management System (ESMS) and associated operational subplans.

This OESMP will be revised once the Environmental and Social Assessment of Phase II activities has been completed and the Construction ESMP (CESMP) has been prepared prior to construction activities. The revision will incorporate key environmental and social risks and impacts and outline how FTA will ensure the effective implementation of mitigation measures.

This document is an overarching framework for environmental and social management.

1.4 Operation ESMP

The Operational Environmental and Social Management Plan (OESMP) outlines environmental and social control measures necessary to manage risks and impacts throughout the airport's operational phase. The OESMP identifies and consolidates:

- Description of the works,
- Relevant regulatory requirements,
- Airport site organisation and operational structure,
- Defined roles and responsibilities within FTA,
- Review, auditing and reporting frameworks,
- Environmental and social risks and impacts,
- Risk-based mitigation and protection measures,
- Performance monitoring and measurement strategies,
- Training requirements,
- Emergency response plans and
- Standard operating procedures and technical instructions.

The development of the OESMP is finalized and supported by the following:

- Policies – overarching system of principles to guide FTA's environmental and social performance,
- Plans – additional, more detailed plans prepared by FTA, contractors related to specific aspects and areas which are impacted by their scope of works (i.e. waste management plan) and

- Procedures – more specific work instructions developed by FTA, in collaboration with contractors, to support the implementation of the plans.

FTA is responsible for ensuring the Project complies with mitigation measures outlined within this document for the operational phase and is also responsible for oversight of the EPC Contractor during the construction phase.

Structure of this document is given below:

Section 1 outlines the institutional arrangements through which the ESMP is implemented and the relationship and responsibilities between FTA and the EPC Contractor. Where relevant, a number of capacity building measures have been identified to ensure that the institutional arrangements are appropriate and qualified for the allocated tasks.

Section 3 introduces the training requirements for operations phase to ensure the right capability and capacity of the staff and organisations involved. It also outlines how to ensure the training is appropriate and records are effectively kept on which staff have received which training.

Section 4 provides an outline on the various site-specific ESHS management and monitoring plans to be implemented as part of the ESMP by FTA and EPC Contractor. The sub-plans are intended to ensure that the various mitigation measures / activities identified through the ESIA process are incorporated by the project in a structured way.

Section 5 gives an overview of monitoring and reporting requirements associated with the activities and commitments contained within the ESMP documentation. The monitoring and reporting requirements include an adaptive management capacity to the ESMP reflecting that it is intended to be a live document subject to regular review and update as the Project evolves.

2. Implementation of the ESMP

2.1 Overview

FTA – the borrower and project developer, and the EPC Contractor – the lead organisation employed to construct the Project are the key stakeholders involved in the operation and construction phases of the Project. FTA has overall accountability for the implementation of the mitigation measures outlined in this ESMP.

FTA will ensure to transpose the measures and principles of this framework document into an Environmental and Social Management System (ESMS) which will include the operational phase of the Project and the EPC Contractor is required to transpose the measures and principles of this framework document into a Construction ESMP (CESMP).

Further detail on the management plans and associated mitigation measures that the different organisations are develop and be responsible for implementing is provided in Section 4 of this document.

2.2 Roles and Responsibilities

This section outlines the roles and responsibilities for Fraport TAV Antalya (FTA) during the operational phase. Roles are determined based on the RASCI Matrix and structured to ensure accountability, oversight, and coordination.

2.2.1 FTA

The FTA holds the ultimate responsibility for the environmental and social performance including the performance of its contractors and overall accountability for the compliance of the Project activities during both construction and operation phases. It is the responsibility of the FTA to oversee and monitor the implementation of relevant ESMP elements by the EPC Contractor and any of their subcontractors during the construction phase. This includes auditing and assessing the EPC Contractor's implementation of the relevant aspects of the ESMP, ensuring that corrective actions are taken when necessary to maintain ESHS performance in line with international standards and good international industry practice (GIIP).

The FTA is responsible for developing the ESMS which outlines the systems and processes established to manage the environmental and social issues and revising relevant environmental and social management plans. The ESMS establish policies for the Project and provide more details on the management at an organisational level in order to implement this ESMP and align with other management system requirements. The FTA is responsible to ensure the EPC Contractor to transpose the measures and principles of this framework ESMP into a Construction Environmental and Social Management Plan (CESMP) prior to site preparation/construction activities take place and to provide periodic monitoring reports on the overall EHS performance of the project including that of EPC and subcontractors.

As the project moved into the operational phase, the FTA have an increased direct role in the management and monitoring of environmental and social issues.

FTA Quality department is responsible to oversee and manage all ESHS issues during the operational phase; this is likely to build on the existing airport ESHS department.

Specifically, they are also responsible for undertaking environmental and social management and monitoring as outlined in this ESMP.

A preliminary staffing structure of the Quality department is presented in Figure 2-2: Preliminary operational EHHS organogram. FTA personnel key roles and responsibilities are illustrated in Figure 2-1 and set out in procedures created as part of the ESMS, including organisational and individual working procedures.

Whilst some evolution of the department structure, staff numbers, and responsibilities is expected, the overall structure and roles and responsibilities is defined and modifications implemented as required.

2.3 Management of Environmental, Social, Health and Safety

In order to meet the organisational roles and responsibilities outlined above, effective staffing structures and roles are in place to manage Environmental, Social, Health and Safety (ESHS) issues and risks for operational phase. This section outlines the structures and roles for operation phase.

During the operation phase, FTA is primarily responsible for developing and implementing the OESMP. Further details are provided below for FTA ESHS organisation.

FTA adheres to the principles of ISO 9001, ISO 14001, ISO 50001, ISO 10002, ISO 27001 and ISO 45001. These standards place strong emphasis on the need for continuous improvement of the ESHS management systems and resultant ESHS management performance.

FTA takes the following actions:

- Provide a operation site layout plan that identifies key activity areas in line with the relevant requirements.
- Develop an OESMP.
- Elaborate other parallel sub plans (e.g. Air Quality Management Plan, Traffic Management Plan etc). For a comprehensive list of required sub-plans, see Table 4-1: Summary of Project plan requirements.
- Produce detailed method statements relating to key activities that include specific reference to requirements of the plans contained herein during the operations and project progression
- Identify a person to be on site with dedicated ESHS responsibilities to oversee works on site. This person must be full time, appropriately qualified, and have more than two years of relevant experience. The E&S team leader supports by an E&S team.
- Provide all training necessary to oversee and implement ESMP requirements prior to and throughout operation as appropriate.
- Be responsible for producing a comprehensive suite of ESHS management and coordination procedures.
- Implement the requirements of the mitigation activities in the OESMP.
- Undertake environmental and social monitoring as specified in this ESMP.
- Appoint the Employee's Grievance Specialist to manage and quarterly report on labour grievances and labour performance monitoring, including all subcontractors
- Report regularly to GM's / the Project Sponsor on any significant environmental social occupational health and safety incidents, as they occur and take appropriate corrective actions
- Ensure the medical facility / first aid office and medics are available for the operation workforce
- Appoint the CLO to interact with the local communities and receive, register, investigate, manage and monthly report on any community grievances received.

All FTA staff is responsible for EHS management in their specific role. The main responsibility of dedicated ESHS staff is to focus on the monitoring of and reporting on OESMP and ESMS commitments and improvements, and any additional plans outside the work of operation site staff.

FTA is responsible for operation contractor performance, including contractor adherence to the requirements of the OESMP. All operation contractors are required to have dedicated environmental and social staff to implement the OESMP and to monitor and manage this on an on-going basis. Contractor staff are required to liaise closely with FTA E&S team. The E&S team structure is set out in Figure 2-1 and Figure 2-12.

The following figure illustrates the Environmental and Social (E&S) communication flow. It outlines how responsibilities, reporting lines, and coordination mechanisms are structured among different FTA departments and stakeholders.

E&S Communication Flow for Operational Phase (see figure below):

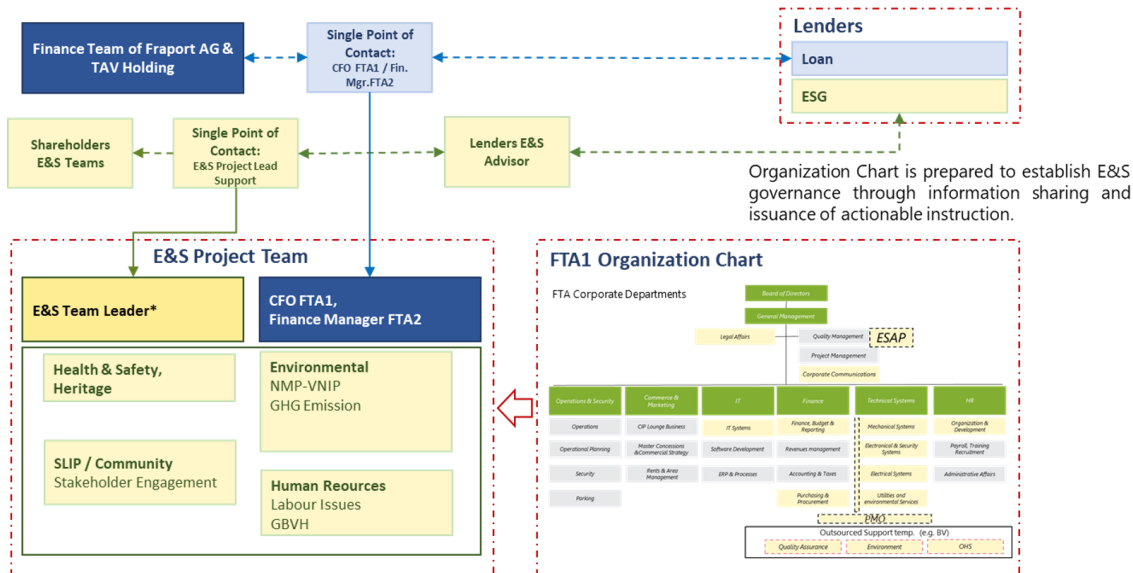


Figure 2-1: E&S Team Structure

FTA

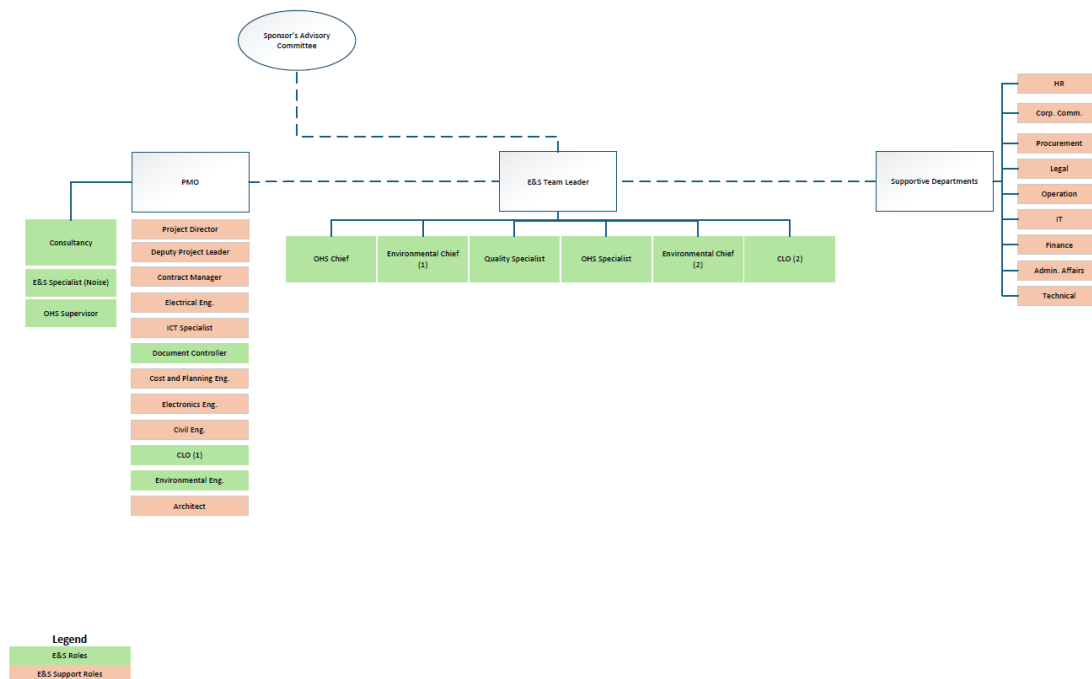


Figure 2-2: Preliminary operational EHHS organogram

Table 2-1: FTA operational E&S Team – key roles and responsibilities

Title	Responsibility	Location
Quality Manager	Accountable for coordinating with the SPC/E&S Project Lead Support, E&S Team Members, and CLO to ensure timely implementation, monitoring, and audits of the ESAP, and for the timely submission of ESAP reports to the Lenders. Manages all support functions related to E&S activities.	On Site
CFO	Responsible for coordination with Lenders and for the timely completion of financial reporting requirements in line with Lender expectations.	On Site
Finance Manager	Shares responsibility with the CFO for coordination with Lenders and for ensuring timely completion of financial reporting obligations.	On Site
Community Liaison Officer (CLO 1)	Responsible for implementing the SLIP and Entitlement Matrix. Maintains communication with all stakeholders (ref: SEP) and manages community grievances, including recording, action, and feedback. Serves as the primary contact for SLIP community-related issues.	On Site
Community Liaison Officer (CLO 2)	Responsible for implementing the Noise Management Plan (NMP) and Voluntary Noise Insulation Program (VNIP). Maintains communication with all stakeholders (ref: SEP) and manages community grievances related to NMP-VNIP. Serves as the primary contact for NMP-VNIP community-related issues.	On Site
Environmental Chief	Acts as the primary communication link with Lenders on E&S matters. Coordinates ESAP monitoring, reporting, and audits, ensuring seamless information exchange between Lenders and the E&S Team Leader. Coordinates with EPC, consultants, and contractors for the implementation of ESAP/ESIA requirements, and ensures timely reporting, including Fuel Farm-related issues.	On Site
Environmental Chief	Responsible for all environmental matters. Implements ESMS and ESAP requirements, prepares environmental documentation, conducts monitoring and audits, and reports on environmental performance. Implements ESAP actions related to GHG emissions, ACA Level 4+, waste management, water resource management, and extreme weather adaptation.	On Site
HSE Chief	Responsible for occupational health and safety matters. Prepares and implements H&S documents, performs monitoring, inspections, and audits, and reports on H&S performance in compliance with ESAP and ESIA requirements.	On Site
Quality Specialist	Responsible for quality management reporting and executing the grievance mechanism. Coordinates and evaluates complaints from passengers, employees, suppliers, and the public. Compiles and reports complaint data periodically and supports the implementation of social responsibility initiatives.	On Site
Energy Systems Manager	Responsible for technical and resource efficiency aspects of ESAP implementation. Acts as the focal point for technical systems, energy management, heating/cooling, and water management.	On Site
Environmental Engineer	Responsible for on-site implementation of environmental requirements, including resource efficiency measures. Acts as the focal point for wastewater management issues.	On Site
E&S Specialist	Supports the implementation and monitoring of the Noise Management Plan (NMP) and the Noise Insulation Program (VNIP).	On Site

HR Manager	Responsible for human resources matters in relation to ESAP and ESIA. Communicates HR policies, worker rights, working conditions, and ensures equal opportunities. Provides training for personnel and serves as the focal point for HR-related issues.	On Site
HR Specialist	Supports HR-related ESAP and ESIA requirements. Manages the employee grievance mechanism, evaluates complaints, and reports grievance data periodically. Supports social responsibility projects.	On Site
HR Specialist (GBVH)	Manages the internal grievance mechanism for GBVH cases, provides related training, and serves as the focal point for all GBVH-related issues.	On Site
Architect	Supports all technical aspects of ESAP implementation and provides technical recommendations in line with ESIA requirements.	On Site
Assistant Manager – Building Maintenance	Coordinates all building maintenance activities, ensuring alignment with ESAP technical requirements and ESIA recommendations.	On Site
Lawyer	Prepares and manages contracts and legal matters under the ESAP framework (e.g., housing and foundation-related issues). Ensures compliance with legal requirements.	On Site
Purchasing Specialist	Conducts market research, manages tendering processes, and oversees procurement and negotiations in line with ESMS requirements, particularly for SLIP-related procurements.	On Site
Purchasing Chief	Conducts market research, manages tendering processes, and oversees procurement and negotiations in line with ESMS requirements, particularly for VNIP-related procurements.	On Site
Contract Manager	Prepares and monitors contracts in compliance with ESAP requirements.	On Site
Corporate Communication Assistant Manager	Manages corporate communications, supports public information meetings with project-affected communities, and prepares information materials (brochures, presentations). Ensures interaction through consultation and public disclosure, collaborates with government agencies, and maintains records of complaints and meetings. Supports campaigns and social responsibility initiatives.	On Site

3. Training

3.1 Overview

In achieving the approach to environmental and social management described in previous sections, it is implicit that all staff receive the required training in both general and job-specific terms. This training should not be considered a stand-alone exercise but must form an integral part of on-going training programmes.

Environmental and social trainings help to ensure that the requirements of the ESIA, ESAP, ESMP and ESMS are clearly understood and followed by all personnel and that the parties involved have the right capability and capacity for their work.

The section describes the requirements training for environmental and social training in the operation phases.

The environmental and social training programme for the operational phase build upon the existing training and capability that already exists for the operational airport. It is the responsibility of the FTA to update the airport's operational training requirements and processes in line with international best practice and lenders' requirements.

All operational staff need to be aware of new ESHS processes and systems that are introduced. This forms part of the remit of the operational ESHS management team.

As new operational staff join, they will receive the updated general environmental and social awareness training, as well as the updated training for their specific role.

Training programmes is reviewed at least annually to ensure they are meeting the Project requirements and international best practice, with updates made accordingly.

3.2 General Environmental and Social Awareness Training

Operational phase staff are expected to have an understanding of the overarching environmental and social policies and plans for airport operations, including how these policies impact upon their role. All staff should have a general awareness of environmental and social matters including labour rights and working conditions, grievance mechanism. Ethical code/code of conduct will continue to be displayed in appropriate venues.

Awareness training includes for emergency preparedness to deal with emergency situations that may impact the environment (e.g. chemical / fuel spillage, aircraft crash, terrorist event or natural disaster such as mudflow or earthquake) where relevant for the role. Practice or test sessions for emergency response performance should be undertaken as needed. Where identified, lessons learnt and improvements should be incorporated into training and procedures.

3.3 Environmental and Social Issues Training

Many operational roles have a greater requirement for training beyond the general environmental and social awareness training. As considered above, there are existing training processes for the operational airport which will be reviewed and updated as required in line with international best practice, with existing operational staff given updated training that is specific for their role. Updates will consider staff current roles, how such roles are currently performed, the associated environmental and social risks, and any gaps found. Trainings on human rights and gender based violence, harassment will be provided to new recruits, and refresher trainings will be provided for all staff at appropriate intervals identified in HR training plans.

3.4 Training Records

Staff complete an attendance sheet for all face-to-face courses attended, including the environmental and social awareness training or "toolbox talks". For trainings organized online via e-nocta, attendance lists are kept digitally in the system.

All records held in a central location by the HR team, and made available during any audit conducted as part of the audit programme.

The frequency and content of the training reviewed regularly to ensure it is effective, delivered in the correct manner and to the correct audience. Lessons learnt during the Project works will be incorporated into the training as they arise.

4. Environmental and Social Management Program

This section details additional studies, management plans and associated mitigation measures which are required to avoid, minimise and compensate for the impacts identified in the ESIA. These plans have been identified as part of the ESIA and ESAP processes.

A summary of the plans along with the Project phase and responsible party is shown in Table 4-1 below.

The plans and procedures identified are framework documents and have been further developed by the FTA and agreed with the Lenders. Plans and policies identified in this section have been taken from the ESIA and ESAP.

Table 4-1: Summary of Project plan requirements

Plan Name	Phase	Responsibility
Community Health and Safety Plan	Operation	FTA
Emergency Response Plan	Operation	FTA
Water Management Plan	Operation	FTA
Wastewater Management Plan	Operation	FTA
Heat Management Plan	Operation	FTA
Asset Extreme Weather Management and Inspection Plan	Operation	FTA
Air Quality Management Plan	Operation	FTA
Noise Management Plan	Operation	FTA
Waste Management Plan	Operation	FTA
Hazardous Material Management Plan	Operation	FTA
Traffic Management Plan	Operation	FTA
Land Acquisition Corrective Action Plan and Supplemental Livelihood Improvement Plan	Operation	FTA
Stakeholder Engagement Plan	Operation	FTA
Environmental and Social Monitoring Plan	Operation	FTA
Supplier and Subcontractor Management Plan	Operation	FTA
L&FS Master Plan	Operation	FTA
Occupational Health and Safety Management Plan	Operation	FTA

Table 4-1 details the mitigation measures defined in the ESIA for different environmental and social aspects of the Project together with the responsible party for operation phases, respectively.

4.1. Environmental and Social Management Plan

The overarching OESMP is prepared to provide guidance on ESHS management approach to be adopted for all activities undertaken throughout the operation phase of the project (which shall be overseen by the FTA).

The OESMP details the control steps necessary to reduce ESHS impacts through the entire operation phase, identifying as a minimum:

- A description of the works;
- Regulatory requirements;
- Site organisation and management;
- Roles and responsibilities;
- Review, reporting and auditing procedures;
- Mitigation and protection measures;
- Monitoring requirements;
- Training requirements;
- Emergency response plans; and
- Method statements (where applicable).

The OESMP is supplemented by various separate sub-plans and procedures (as listed in Table 4-1) which is developed to address key ESHS aspects identified during the ESIA process to detail control procedures and define associated responsibilities for implementation.

The OESMP is also shared with local authorities, as required.

For the operational phase, an overarching ESMS is prepared in accordance with national legislation, standards and guidelines. The structure and objectives of the report will largely be the same as the OESMP. FTA is responsible for ensuring that the operation complies with mitigation measures outlined within this document for the operational phase.

Table 4-2: Operation phase ESMP

Aspect	No	Subject	Relevant Requirement	Mitigation Measure	Responsible Party	Timing	Supporting Sub-Plan(s)
General	O1	Environmental and Social Management System	IFC PS1 EBRD PR1	Operation phase Environmental and Social Management System (ESMS) will be developed in line with international good practice and guidelines. At present, the following plans are identified which will be part of the operation phase ESMS: • Community Health and Safety Plan • Emergency Response Plan • Operation Water Management Plan • Air Quality Management Plan • Noise Management Plan • Waste Management Plan • Hazardous Material Management Plan • Traffic Management Plan • Cultural Heritage Management Plan • Chance Finds Procedure • Grievance Mechanism Procedure • Audit Procedure • Corrective Action Plan and Supplemental Livelihood Implementation Plan • Stakeholder Engagement Plan • Supplier and Subcontractor Management Plan • Asset Extreme Weather Management and Inspection Plan • Life and Fire Safety Management Plan • Environmental and Social Monitoring Plan	FTA	Operation phase	
	O2	Permitting	National legislation	All necessary permits/consents/approvals will be obtained in accordance with the national legislation.	FTA	Operation phase	
Water Quality, Hydrology and Hydrogeology	O3	Protection of surface water and groundwater	IFC PS3 EBRD PR3 Best Practice National legislation	• Ensuring continued used of specific zones for loading and unloading (if concerning toxic substances), including refuelling and maintenance of support vehicles. These areas shall be impermeable where the collection and disposal of any spills or leaks can be done so easily. • Vegetating exposed surfaces to limit sedimentation • Implementation of a groundwater quality monitoring regime in accordance with Regulation on the Protection of Groundwater against Pollution and Deterioration and 2006/118/EC Groundwater Directive in quarterly periods at the same locations monitored during the construction phase with records maintained to allow tracking of conditions. • In case of an emergency spillage situation, emergency pollution prevention plans will be maintained to the appropriate international standards, with training given to staff on how to	FTA	Operation phase	Operation Water Management Plan Environmental and Social Monitoring Plan

Aspect	No	Subject	Relevant Requirement	Mitigation Measure	Responsible Party	Timing	Supporting Sub-Plan(s)
				use the kits as well as general environmental awareness training to all staff to encourage incident reporting if a potential problem is spotted. Any major spillages would be considered an emergency which would require implementation of the emergency spill response plan			
	O4	Efficient use of water	IFC PS3 EBRD PR3 Best Practice National legislation	The FTA already implements the below listed actions to use water efficiently for landscape activities: - Plant species with high water consumption (such as <i>Eucalyptus Globulus</i>, <i>Salix Babylonica</i>) were not used in the vegetation created with the aim of protecting the water consumption of groundwater in the airport. - Plants with low water consumption (such as <i>Washingtonia Robusta</i>, <i>Phoenix Dactylifera</i>) were preferred instead of plants that consume a high amount of water. - Landscape irrigation activities are carried out at a time when the sun's rays will not cause evaporation, - Irrigation is done as needed by the plants. - Use of smart systems in landscape irrigation. (Sprink system, drip irrigation system, etc.) Adjusting the settings of the sprinklers according to the direction of the wind during the landscape irrigation process. To minimize the consumed water and use the water more efficiently, The FTA will investigate the methods to increase the efficiency of the above listed measures together with alternative actions such as; - Rainwater harvesting by collecting runoff from paved areas, rooftops, and open areas within the airport. - Recovering Air Handling Units (AHU) of the air conditioning system condensate and feeding it to the cooling tower circuit thus enhancing water use efficiency of the chiller plant. - Electronic taps to be installed at all terminals and explore implementation of the same measure in non-terminal areas - Daily monitoring of water use will be conducted to ensure the effectiveness of the above measures	FTA	Operation phase	Operation Water Management Plan Wastewater Management Plan
Soils and Geology	O5	Protection of soil quality	IFC PS3 EBRD PR3 Best Practice	- Quality of the underlying soil will be preserved through implementation of effective hazardous material and waste management procedures. Materials and wastes will be handled according to the Hazardous Material Management Plan and Waste Management Plan. - Fuels, oils and chemicals will be stored on an impervious base protected by bunds to 110% of capacity. Fuel will be stored in designated areas. Any spillages from handling fuel and liquids will be immediately contained on site. - Spill kits will be available to deal with accidental spillages or leaks to ground. - Potentially contaminated materials will be removed from site as soon as practicable for authorised disposal and suitable treatment. - It will be ensured that hazardous material transport procedures follow the applicable national and international standards and guidelines.	FTA	Operation phase	Hazardous Material Management Plan Waste Management Plan

Aspect	No	Subject	Relevant Requirement	Mitigation Measure	Responsible Party	Timing	Supporting Sub-Plan(s)
				It will be coordinated with the fuel farm operators that the fuel farm is operated in line with the Seveso Directive. The fuel farm will be audited against Seveso requirements prior to its commissioning.			
Climate change	O6	Climate change	IFC PS3 EBRD PR3 Best Practice	- Inspections, maintenance and renewals of surfaces, structures, buildings and equipment for signs of deterioration due to heat and following extreme weather events such as heatwaves, storms and surface water flooding Heat Index (HI) thresholds, as defined by the Turkish State Meteorological Service, are used to trigger inspection and protective protocols for assets and personnel - For all critical systems (BHS, HVAC, PBB, IT, energy, security), during days exceeding 45°C, inspection protocols require checking maintenance records, monitoring through SCADA/automation systems, and implementing pre- and post-event maintenance activities. Inspection frequency and protective measures are adjusted according to the four Heat Index levels, with specific response actions and KPIs (indoor temperature compliance, heat-related incidents, heat-related complaints) - Periodic review of climate projections ahead of major upgrades and renewals to inform specifications of equipment to be installed - Consideration of air temperatures and air pressures within scheduling of flights, aircraft payload limits and aircraft design specification - Establishing heat trigger levels at which flights are rescheduled or cancelled - Scheduling of routine inspections at cooler times of day and routine replacements at times of year less likely to encounter weather extremes - Robust management plans for extreme weather conditions, including heatwaves, storms and surface water flooding - Before events such as storms, heavy rainfall, and extreme heat, drainage systems are inspected; after events, isolation tests and damage assessments are conducted for affected assets - Identification or creation of cool refuges to be used for staff and passengers as part of first aid response including designated cooling areas inside terminal buildings prepared and equipped as safe first aid points - Flight scheduling to consider higher future temperatures and working and travelling conditions. Flight cancellations and passenger management in extreme heatwaves that create unsafe working conditions and these operations follow Heat Index protocols including crowd control, hydration stations, and coordination with crisis desks during extreme heat events - Emergency planning for wildfires, including evacuation protocols, and placement of fire suppression equipment. High-temperature scenarios are addressed within the Emergency Plan, with the crisis desk implementing additional measures for passenger density management when required - Contingency planning for loss of external power and communications including ground and passenger handling	FTA	Operation phase	Heat Management Plan Asset Extreme Weather Management and Inspection Plan Water Management Plan Emergency Response Plan Traffic Management Plan

Aspect	No	Subject	Relevant Requirement	Mitigation Measure	Responsible Party	Timing	Supporting Sub-Plan(s)
				- Develop a water resource management plan to minimise the quantities of groundwater that is required for abstraction and maximise water efficiency of the airport. The increase in new tank capacities will be monitored to ensure it does not exceed the capacity of existing wells, and authorization processes for new wells will be followed where necessary. The provision of additional water is planned to meet both increased demand from future airport operations and additional requirements caused by higher future temperatures. - Groundwater levels are regularly checked; during heavy rainfall or drought, consumption reduction measures are applied, and alternative water sources are investigated. Daily monitoring of water use will be conducted to assess the effectiveness of these measures. FTA targets a constant annual reduction in water consumption, with KPIs based on consumption and recovery records. A periodic review will be undertaken to evaluate the impacts of climate change and the success of water-saving activities. - Ongoing management plans and conservation in locally affected areas. Policies and plans for biodiversity management should take the risks of climate change into consideration, especially droughts and floods. - Preparation of a traffic management plan that takes the risk of increased heatwaves and extreme weather events in the future into consideration. - Consideration of climate change within future building upgrades and designs, to include adequate shading and cool spaces, including cool refuges as part of first aid facilities. Buildings should provide adequate ventilation such as through selection of appropriate materials, light colours for painting and cladding, passive cooling, indoor biophilic designs and HVAC systems for extreme temperatures. - Monitoring of air quality and creation of management plans and processes if quality levels are deemed to be unacceptable. This could include changes in traffic management to reduce emissions and exploring clean air solutions for airport activities such as a green ground fleet and improved public transport. - Heat Management Plan KPIs are monitored and reported (indoor temperature compliance, heat-related incidents, passenger complaints), with thresholds reviewed annually to ensure operational readiness under increasing extreme heat conditions.			
Biodiversity	07	Enhancement of grassland within the airport	IFC PS6 EBRD PR6 Best Practice	- Enhance the habitat for biodiversity via avoiding cutting grasslands during the flowering / fruiting periods of most species in summer as well as reviewing and (if possible) improving the grassland and pesticides management procedures. Other measures to manage the bird strike risk will need to be implemented in parallel. - DHMI will be responsible for operational measures and improvement studies.	FTA	Operation phase	Environmental and Social Monitoring Plan DHMI's Airport Operations Services Directive (Amendment Date: 01/04/2019)
	08	Management of bird strikes	IFC PS6 EBRD PR6 Best Practice	Additional, non-habitat measures will be implemented to reduce the bird strike risk. This may involve bird scarers (firing of bird scaring cartridges, broadcasting bird distress signal), canon shooting and/or using radar equipment. Currently, the existing airport uses a range of different	FTA	Operation phase	Environmental and Social Monitoring Plan

Aspect	No	Subject	Relevant Requirement	Mitigation Measure	Responsible Party	Timing	Supporting Sub-Plan(s)
				methods to manage and control wildlife to avoid strikes. These include alarm / siren sounds, gun blasting, and disinfection / pest control among other methods. DHMI will be responsible for operational measures and improvement studies.			DHMI's Airport Operations Services Directive (Amendment Date: 01/04/2019)
Air quality	O9	Air emissions	IFC PS3 EBRD PR3 Best Practice National legislation	- To reduce or eliminate APU, GPU and air conditioning unit usage, 400-Hz fixed electrical ground power, pre-conditioned air (PCA) at gates/maintenance areas will be provided - To emissions reduction and fuel savings, driving distances through route planning will be reduced and unnecessary idling of equipment will be avoided. - All other Scope 1-2 carbon emissions will be effectively managed and other relevant stakeholders will be cooperated. - Emission reductions of up to 97% can be achieved through the application of best available techniques for fuel storage tanks. While the implementation is led by other parties, we will continue to collaborate closely to support the effective application of these measures. - VOC monitoring at the proposed fuel farm is being conducted to assess potential impacts on nearby receptors. We will remain engaged in the process and contribute as needed to ensure effective monitoring and coordination with relevant stakeholders. - Target to electrify the Ground Support Equipment (GSE) fleet with specific KPIs: 50% electric or zero-emission by 2035 and 75% by 2040 - Installation of electric charging stations at landside and airside parking areas, with year-on-year increase in charging points to support both passenger and operational vehicles	FTA	Operation phase	Air Quality Management Plan
Greenhouse gases	O10	Airport buildings and ground operations	IFC PS3 EBRD PR3 Best Practice	- Attempt to minimise waste throughout airport buildings and during ground operations through a reduction of resource use and optimising the rate of recycling & reuse. This can be achieved by continuing to set ambitious waste & recycling targets which monthly monitoring, and re-assessing them regularly. Staff should be regularly reminded of these targets to embed waste minimisation into decision making. Tenants of airport shops should be encouraged to introduce waste reduction policies such as plastic bag charges, plastic bottle deposits & discounts for using reusable cups. - Periodical maintenance of on-site equipment and vehicles to ensure optimal operational efficiency. Although the airport will already regularly carry out maintenance, preventive testing and schedules will explicitly <i>include assessments of greenhouse gas impacts from inefficient equipment & vehicles, with corrective actions taken and optimisation in consultation with manufacturers to achieve efficiency and emission reductions.</i> - R-134a and R-410a refrigerant gases are to be used within the air-conditioning system. Measures should be in place to use refrigerant gases with less global warming potential (GWP) where possible, <i>prioritising lower-GWP alternatives (R-513A, R-1234ze, R-32) and ensuring leaks are promptly detected and repaired to minimise environmental impact.</i>	FTA	Operation phase	Air Quality Management Plan Environmental and Social Monitoring Plan
	O11	Surface access	IFC PS3	Support an increase in efficient and convenient sustainable transport use to, from and across the airport for both passengers and workforce. Infrastructure, which supports low carbon	FTA	Operation phase	Stakeholder Engagement Plan

Aspect	No	Subject	Relevant Requirement	Mitigation Measure	Responsible Party	Timing	Supporting Sub-Plan(s)
			EBRD PR3 Best Practice	modes of transport should continue to be installed at the airport. Conversations with public transport providers should be held to ensure accessibility to the airport via public transport is easy, with frequent services. This will encourage the public to take public transport over private modes of transport. Ambitious targets for electric vehicle use within the airport adopted and workplace schemes which subsidised electric vehicle purchase should also be considered to mitigate emissions. • A Stakeholder Partnership Plan will be implemented to enhance bus, tram, and shuttle services through collaboration with Antalya Metropolitan Municipality, ensuring optimized routes, frequency, and accessibility. • Consider an emissions-based access charge around the airport. An emission-based access charge would encourage the uptake of low carbon transport modes for passengers and staff. The charge could also generate money for the airport. • Implement measures to challenge the need for the purchase of more airport related combustion vehicles. Measures could include, considering electric alternatives where possible, challenging the need for new vehicles & increasing the maintenance of existing vehicles to ensure they last longer.			Traffic Management Plan
Noise and vibration	O12	Noise	IFC PS3 EBRD PR3 Best Practice	Land use planning • The remaining non-urbanized regions around airport should be planned as commercial or remain as agricultural areas. Not allowing more residential planning in the vicinity of the airport seemed a valuable approach. • Reducing the portion of sensitive receivers mainly dwellings and schools, in new land use plans are recommended at the vicinity of airport. Mainly commercial or industrial structures need to be preferred. • For residential locations seriously exposed to environmental noise sources from airport activities implementing insulation programs will surely reduce the noise levels inside the buildings. Nonetheless, limiting values defined for environmental noise in; EU regulations, and WHO guidelines are determined for façades (outside) of the sensitive locations. For LTO noise, due to airside operations falling under the responsibility of DHMI, the implementation of below mitigation measures will fall on both the DHMI and FTA • Development of a noise management program , which should include defined noise monitoring, mitigation measures both planned, and alternatives, noise targets, complaint monitoring, effective grievance management on noise and assessment of possible noise abatement routes. • Continuous noise monitoring in support of the noise management program to confirm and record noise levels and to identify if further mitigation is required. 7 additional noise monitoring stations are set up. • Cooperation with local authorities through regular updates of the noise maps and noise action plans, implementation of the national regulations to new built houses in regard to enhanced technical requirements for noise insulation.	FTA	Operation phase	Noise Management Plan

Aspect	No	Subject	Relevant Requirement	Mitigation Measure	Responsible Party	Timing	Supporting Sub-Plan(s)
				Additional mitigation measures to address the air side noise impacts from aircraft LTO and ground operations (third party impacts) include: • ICAO-A procedures will be applied and for the implementation will be carried out in cooperation with stakeholders . While this approach, as per the ESIA reports, will not reduce the noise levels significantly at sensitive receiver locations (because the impact significance levels do not change dramatically with this application), it will provide additional relief from noise nuisance. • Regularly update and share noise contour maps and annual noise monitoring reports with local planning authorities to inform land-use decisions and ensure that new developments incorporate adequate noise mitigation measures based on up-to-date noise exposure data • Cooperate closely with municipal authorities (e.g., via the Antalya Noise Strategic Action Plan Committee) by sharing noise study data (noise measurements, updated impact zone maps) and expertise, supporting data-driven planning policies that minimize community noise exposure Voluntary Noise Insulation Programme • In line with the Noise Management Plan, the VNIP will be implemented progressively, covering affected buildings every five years with clearly defined eligibility criteria and annual review of monitoring data to verify effectiveness • According to the results of the noise monitoring studies, providing that noise limit exceedances are observed, buildings with exceedance will be detected and included into a noise insulation programme. Programme includes replacement of the window structures and strengthened window casings . Noise insulation program is not valid for buildings constructed after start date of the project. These buildings are covered with new Turkish legislation in regard to technical requirements against noise. • Noise insulation scheme to be implemented for local residents impacted by exceedances of national nighttime outdoors noise standards with a target noise level of at least 40dBA indoors. While noise insulation program has to be implemented in line with monitoring and noise management undertaken by DHMI and in cooperation with local authorities, the cost will be covered by FTA. The Noise Management Plan also ensures coordination with DHMI for continuous monitoring, public complaint management, and alignment with national regulations regarding noise insulation requirements • The program will have clearly established steps and eligibility criteria and applications form public will be verified against ongoing noise monitoring values and supported by site visits. Operational restrictions			
Social	O13	Population	IFC PS2 EBRD PR2	• As a part of the SEP, formal grievance mechanism has established to capture and address any community complaints during the operation phase. This allows ongoing monitoring of grievances and ensures timely resolution of issues raised by affected population groups • Consultation on ongoing Project activities (SLIP, NMP, Southern Road, etc.) is conducted with local businesses and residents; potential impacts are explained, communication channels and the FTA grievance mechanism are reiterated, and information is proactively shared via CLO	FTA	Operation phase	Stakeholder Engagement Plan

Aspect	No	Subject	Relevant Requirement	Mitigation Measure	Responsible Party	Timing	Supporting Sub-Plan(s)
				outreach and other communication tools, preventing population-related concerns from escalating			
	O14	Neighbouring communities	IFC PS2 EBRD PR2	- In case of the problems that may occur in traffic, (i.e., any improper management of internal traffic flow (circulation routes for pedestrian, visitors/personnel cars/shuttles, logistics), traffic load increase on local roads and increased risk of traffic-related accidents or injuries on the transportation routes), The FTA may seek alternative solutions with other relevant institutions (such as directorate of highways or local municipalities) to lower speed limits and increase traffic control measures in addition to effective implementation of Traffic Management Plan). - There is a Voluntary Noise Insulation Programme that will continue to be implemented during operation phase for the buildings in identified noise impact zone. - To support the Noise Management Plan, seven noise monitoring stations installed to monitor noise impacts. These stations continuously track noise levels, enabling to evaluate the effectiveness of noise mitigation measures and respond if noise thresholds are exceeded. Ongoing noise data is publicly accessible, reflecting the commitment to transparently manage and reduce noise impacts on neighbouring communities.	FTA	Operation phase	Noise Management Plan Traffic Management Plan Stakeholder Engagement Plan
	O15	Employment	IFC PS2 EBRD PR2	- FTA has a Supplier and Subcontractor Management Plan to regular the relations of the different business bodies operating at AYT. - As a part of the SEP, it is possible to monitor the grievances of the people during the operation phase. - Quick resolution of existing problems with the grievance mechanism will increase stakeholder participation and satisfaction as well as the customer satisfaction. - FTA will ensure all stakeholders' participation in decision-making processes that will affect the relevant parties and will inform them of the changes and developments in the practices in a timely manner.	FTA	Operation phase	Supplier and Subcontractor Management Plan Stakeholder Engagement Plan Community Health and Safety Plan Stakeholder Engagement Plan
	O16	Livelihood and Tourism	IFC PS2 EBRD PR2	- To maintain and ensure an increase in the local employment, job announcements are shared with effective means to the local communities. - Regular communications are held with the relevant local institutions and NGOs for skilled and semiskilled personnel need. - Grievance data (community and workforce) is periodically analyzed to identify trends and improve management actions - Monitoring reports on stakeholder engagement and grievance resolution are prepared regularly and used to improve management practices	FTA	Operation phase	Corrective Action Plan and Supplemental Livelihood Implementation Plan Supplier and Subcontractor Management Plan Stakeholder Engagement Plan
	O17	Education	IFC PS2 EBRD PR2	Noise impact assessment and noise isolation around sensitive buildings such as schools will be prioritized starting from year 2025. Noise impacts are monitored throughout operation period.	FTA	Operation phase	Noise Management Plan Air Quality Management Plan Community Health and Safety Plan

Aspect	No	Subject	Relevant Requirement	Mitigation Measure	Responsible Party	Timing	Supporting Sub-Plan(s)
	O18	Vulnerable Groups	IFC PS2 EBRD PR2	- Chargers for disabled vehicles have been provided to make travelling more comfortable and easier for disabled people. - FTA recognizes the importance of ensuring accessibility and safety for vulnerable groups, particularly persons with disabilities. - As part of its commitment to social inclusion, FTA employs persons with disabilities at a rate exceeding the legal requirement. The list of employed persons with disabilities is kept up to date and specific evacuation procedures have been established for these individuals in case of emergency. - For passengers, both visual and auditory announcement systems are in place throughout the terminals. Passengers with reduced mobility (PRMs) are assisted by ground handling service providers who are responsible for safe and timely transfers. Significant infrastructure upgrades have also been implemented in both existing and new terminal facilities to improve accessibility for passengers with disabilities, including adapted restrooms, ramps, tactile surfaces, and elevators.	FTA	Operation phase	Community Health and Safety Plan Stakeholder Engagement Plan Emergency Response Plan
	O19	Gender Consideration	IFC PS2 EBRD PR2	- It is ensured that Ethical Code of Conduct of FTA and the grievance mechanism are disclosed to passengers and relevant stakeholders. - FTA staff obtains trainings on GBVH-related risks and human trafficking issues. - The trainings aim at including all employees, especially security personnel are trained in this regard. - Grievance records are reviewed by gender of the complainant and the subject of the grievance.	FTA	Operation phase	Community Health and Safety Plan
Occupational health and safety	O20	Operational health and safety risks	IFC PS4 EBRD PR4	The FTA and its contractors comply with the international standard ISO 45001 requirements and complete OHS division with OHS Chief. The FTA should ensure to continue to apply the following plans and procedures and to keep them updated according to the needs of the project: - The FTA OHS Policy is developed, approved, and disclosed, sets achievable and measurable goals and objectives, and allocate OHS duties and responsibilities of FTA employees. - OSHSMS should be a part of The FTA corporate management system, along with the quality, environmental and social management systems. OHSMS functioning must be provided with sufficient and qualified human and financial resources. - OHSMS should not depend on the production needs or economic performance of The FTA. Top management of The FTA should demonstrate their commitment to occupational safety (including prevention of GBVH risks at work). - OHSMS should be targeted at increasing labour productivity but not only on risk control. - OHSMS including OHS targets and goals should be updated and improved at continuous basis. - Health and safety risks (including GBVH risks) should be managed by suitably-qualified and well-trained officers. OHSMS officers' responsibilities and competencies must be documented and approved by the FTA GMs.	FTA	Operation phase	Occupational Health and Safety Management System Community Health and Safety Management Plan Life and Fire Safety Master Plan Environmental and Social Monitoring Plan Stakeholder Management Plan

Aspect	No	Subject	Relevant Requirement	Mitigation Measure	Responsible Party	Timing	Supporting Sub-Plan(s)
				- Measures to achieve the FTA OHS targets and goals should be carefully planned. All planned actions and expenses must be reflected in the relevant documents of The FTA (plan for maintenance and repairs, procurement plan, construction plan, budgets of The FTA and departments). - To ensure the FTA OHS conditions, and particularly the OSHMS performance, top management should periodically assess the OHS performance, and develop a set of corrective actions if necessary. - In addition, participation in OHSMS functioning and the awareness of each employee of The FTA about the possibility of participating in the improvement of working conditions based on dialogue is the most important element of the OHSMS. To mitigate OHS risks, The FTA will continue to: - Undertake an independent audit of Life and Fire Safety, in line with IFC Performance Standard 4 and EBRD Performance Requirement 4. - Ensure the safe exploitation of production equipment, provide periodic safety tests of equipment, and timely repairs and maintenance. - Prioritise and select the safest technological processes during design. - Ensure safe operation of buildings and structures, provide timely repair and maintenance. - Conduct a periodic assessment of working conditions at workplaces and develop an improvement action plan. - Regularly monitor and improve the working conditions of employees, including workplaces, recreation areas, microclimate, and others if necessary. - Strictly follow the orders and recommendations of the OHS supervisory authorities to ensure occupational safety compliance. - Provide workers with appropriate and comfortable personal protective equipment in a timely manner. - Conduct a proper and independent analysis of accidents, occupational diseases, and industrial injuries and complete the preventive and corrective actions identified as soon as they can. - Provide an optimal mode of work and rest in compliance with the legal working hour restrictions. - Prevent unqualified personnel from performing work with hazardous equipment. - Identify focal points and upskill them through GBVH-related trainings. - Prepared a specific policy related to GBVH issues. - Implement the internal grievance mechanism and regularly monitor the functionality of the mechanism to improve if there are shortcomings related to handling GBVH grievances.			
	O21	Gender considerations	IFC PS4	In line with FTA's commitment to promote gender equality in supply chain engagement, the Procurement Department aims to strengthen inclusive procurement practices.	FTA		Community Health and Safety Plan

Aspect	No	Subject	Relevant Requirement	Mitigation Measure	Responsible Party	Timing	Supporting Sub-Plan(s)
			EBRD PR4	For contracts exceeding a certain threshold, where all other bid conditions and evaluation criteria are equal, FTA intends to give preference to women-owned businesses • 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. • The items in the GBVH Procedure on gender equality and prevention of GBVH risks are disclosed to all employees through interactive communications and detailed explanations. • Trainings on gender equality and prevention of GBVH risks given to the workers GBVH Procedure will be involved in the training content and disclosed during the trainings. • The trainings aim at including all employees. • Measures taken to reduce the risks in the working environment (for example, separate toilets and bathrooms for male and female employees, separate rooms for leisure times, etc.). • Internal grievance mechanism is accessible and confidential for female employees of FTA to prevent GBVH cases with the possibility of anonymous application. • Grievance records are reviewed by gender of the complainant and the subject of the grievance.			Stakeholder Engagement Plan
Waste and Resources	O22	Resource management	IFC PS3 EBRD PR3 Best practice	• Integrate sustainability and resource efficiency practices into the Project during the design phase and address them during the supplier procurement process • Improve the existing systems and verification practices (i.e. Purchasing/Supplier Evaluation) to identify where the supply is coming from and the habitat type of the source area and to limit procurement to suppliers that can demonstrate that they are not contributing to significant conversion or degradation of natural or critical habitats. • Institute procurement measures for material supply that recognize opportunities such as ordering the correct number of materials to be delivered when needed, reducing the amount of packaging used by suppliers and establishing a take back system with suppliers • Engage with suppliers to substitute raw materials or inputs with less hazardous or toxic materials wherever economically and technically feasible	FTA	Operation phase	Supplier & Subcontractor Management Plan Waste Management Plan
	O23	Energy management	IFC PS3 EBRD PR3 Best practice	• Energy management program has been implemented including identification, and regular measurement and reporting of principal energy flows within a facility, definition and regular review of energy performance targets, and regular comparison and monitoring of energy flows with performance targets to identify where action should be taken to reduce energy use • For any energy using system, a systematic analysis of energy efficiency improvements and cost reduction opportunities is performed to reduce losses in energy distribution, improve energy conversion efficiency, exploit energy purchasing opportunities, and use lower-carbon fuels • Opportunities in system design, process heating, heating load reduction, heat distribution systems, energy conversion system efficiency, process cooling is discussed in the procurement stage with the companies. • Prioritize energy efficiency in the buildings with low-energy design	FTA	Operation phase	Air Quality Management Plan Environmental and Social Management Plan

Aspect	No	Subject	Relevant Requirement	Mitigation Measure	Responsible Party	Timing	Supporting Sub-Plan(s)
				- Passive efficiency measures (increase the insulation of walls or windows, reduce the need for artificial lighting, maximize opportunities for daylighting and natural ventilation where appropriate etc.) - Active efficiency measures (minimize energy demand from building services: space heating and cooling, hot water, lighting, auxiliary loads, and equipment: computers, plug in devices, laboratory equipment) - Facility management team to develop and implement a Building Operations Plan including digital energy monitoring and verification, building digitization, automation system, operational set points for HVAC and lighting, equipment			
	O24	Waste and wastewater management	IFC PS3 EBRD PR3	- Procurement: Environment friendly resource materials and waste disposal equipment would be determined at the design stage and purchased/installed. - Planning: Develop and implement waste management plan/plans in accordance with the national and international standards. The management plan acknowledges the key waste management practices such as, waste minimization, proper collection segregation, storage, transportation treatment and disposal of the waste, which in turn ensures that the correct disposal procedures are taken, personnel safety is maintained, and environmental harm is minimized. - Training: All staff involved in waste handling would be trained on the waste handling treatment, and disposal techniques. Correct and efficient waste management will only be achieved through rigorous training and education of employees, supervisors and managers. - Minimization: Waste Reduction was integrated in the management plan of the Project to ensure that waste generation will be the barest possible minimum at source. - Segregation: Proper segregation of waste at source was implemented for efficient and effective in managing waste and to reduce the quantity of waste requiring treatment prior to final disposal and ultimately reduces the cost of waste treatment/management. - Segregation involves putting different classes of wastes into separate and appropriate temporary storage color-coded containers/bags as recommended by the national legislation to allow segregation and collection at the point of generation. - Colour coding is done by using colours to differentiate waste classes from one other. Colour coding is one of the efficient ways of achieving segregation of waste and for sorting out items such as paper, plastic, glass and metal for recycling. - The packaging would be appropriate for the type of waste involved. - All waste bags or containers were labelled. Basic label information is include type of waste in the container, date of collection and, warning of hazardous nature. Labelling is important to identify the source of the waste in case of an accident or improper segregation of the waste, to ensure that the workers responsible for waste management handle the different types of wastes safely. - Odour:	FTA	Operation phase	Waste Management Plan Wastewater Management Plan Supplier and Subcontractor Management Plan

Aspect	No	Subject	Relevant Requirement	Mitigation Measure	Responsible Party	Timing	Supporting Sub-Plan(s)
				○ The amount of packaging waste and mixed municipal waste received at the waste collection and segregation facility is managed by implementing effective waste segregation methods at source. (i.e., increasing waste trainings for employees and posting informative posters inside the airport for passengers) • Monitoring: Regular visual inspection/audits for waste management strategies are performed and audit mechanism is integrated in the management plans. ○ All waste collection and storage areas are inspected for evidence of accidental releases and to verify that wastes are properly labelled and stored. ○ Regular audits of waste segregation and collection practices. • Recording: ○ Tracking of waste generation trends by type and amount of waste generated ○ Keeping records that document the amount of waste generated and its destination. • All domestic and aircraft wastewater is collected and treated at the on-site wastewater treatment plant (WWTP) in accordance with national standards and IFC/EBRD requirements. Industrial wastewater (which cannot be treated in the domestic WWTP due to higher pollutant content) is collected by vacuum trucks and transported to licensed off-site industrial wastewater treatment facilities. The WWTP effluent is regularly monitored to ensure compliance with discharge limits, and the treatment system is properly maintained to prevent environmental harm. • All contractors, subcontractors, and suppliers are required to adhere to the Project's waste and wastewater management requirements. These requirements are integrated into procurement and contract conditions, and compliance is verified through regular monitoring and audits of contractor performance.			
Traffic	O25	Operational traffic management	IFC PS4 EBRD PR4	General traffic management for increased traffic due to HGV and passenger movements • A TMP is developed for the operation phase outlining safety measures for internal traffic management including vehicle operations, use of access roads, vehicle and pedestrian routes, use of parking facilities. • It is ensured by The FTA in coordination with DHMI that traffic and transport procedures within the Airport follow the applicable national and international standards and guidelines. • Due to the increasing number of passengers, a shuttle service has been introduced between Terminal 2 and Terminal 1. Monitoring of airport traffic increase and impacts on local road network will be undertaken. • A consultative approach to planning and clear guidance signs for the car park areas are implemented. • Necessary communication and collaborations with local/governmental authority, NGOs, neighbouring facilities and commercial organizations regarding traffic and transport management are undertaken.	FTA	Operation phase	Traffic Management Plan

5. Monitoring and Reporting Requirements

5.1 Overview

Effective reporting and independent auditing are conducted to support continual improvement. Performance monitoring, reporting, and auditing are being carried out to ensure compliance with the requirements of the ESIA and this ESMP. The scope and format of all reports outlined below have been agreed with the Lenders, categorized by operational phases.

This section is aligned with the Environmental and Social Monitoring Plan (ESMoP), which provides detailed requirements for monitoring activities during the operational phase. The ESMoP is referenced throughout this section to ensure consistency and completeness.

5.2 Internal Monitoring

During the operational phase, monitoring and reporting are important to ensure the continued implementation of the ESMS.

The Quality Department undertakes regular environmental, social, and health & safety site visits. Notes from these site visits are sent to the E&S Team Leader. Key Performance Indicators (KPIs) serve as a primary tool for monitoring, with detailed descriptions and application methods provided in the Environmental and Social Monitoring Plan.

The Quality Department should prepare a report annually on the activities for the Lenders. The report should include the following information:

- Information on progress, main achievements and challenges.
- Progress in implementing the ESMS and the individual management plans.
- Incidents and accidents, number of staff working on site (including subcontractors) and security/H&S statistics.
- Social activities and statistics on complaints received. This should also include information on the actions taken to address the complaints raised.
- Environment activities and statistics on environmental incidents. This should also include actions taken or measures to be put in place to address any non-compliance noted on site.
- List of subcontractors.
- Update on programme of activities.
- Information on permits, quality assurance, other relevant contractual information.

The Quality Department conducts site visits in accordance with the monitoring frequencies specified in the individual management plans and the Environmental and Social Monitoring Plan (ESMoP). These visits address all aspects reflected in the annual report, including progress, ESMS implementation, incidents, social activities, environmental performance, subcontractor management, programme updates, and compliance with permits and quality requirements.

The Quality Department conducts reviews of all the individual management plans at least once per year, or when an event triggers the update of a management plan.

A register of all necessary external stakeholders, including regulatory reporting requirements, is listed within the ESMS. The frequency of reporting, format, and minimum content, along with the person responsible, are included in the register as agreed with the Lenders.

Together with FTA, The Project Sponsor ensure that all the necessary reports are produced and submitted in a yearly fashion to maintain ongoing regulatory compliance throughout the life of the Project.

The Project Sponsor

5.3 Environmental and Social Baseline Monitoring

The FTA ensures that all environmental and social monitoring requirements are met. The environmental and social monitoring is agreed with the Lender and includes monitoring of the items described in Table 5-1 (in addition to items identified as part of the project ESAP). This is ensure that the management measures that have been identified for the operation phase of the Project are working.

Where monitoring identifies exceedances in the standards that are being applied, then environment and social management measures need to be reviewed for their effectiveness. Changes would be made to these management measures or to operational practices to ensure compliance with the standards.

In addition, monitoring is required to confirm compliance with permits/licence conditions, national regulations, and international guidance.

The ESMS includes full details of operational monitoring requirements, including frequency and location.

Table 5-1: Operational Phase E&S Monitoring

ESIA Topic	Monitoring Activity	Monitoring Description and Standards Applied	Response to Non-Conformity	Location	Frequency and duration	Responsible party
Soils and Geology	Site Investigation Groundwater Monitoring	Monitoring should comprise: - Heavy metals and metalloids including; arsenic, cadmium, copper, chromium (III and VI), lead, mercury, nickel, selenium, zinc). - pH, dissolved organic carbon, ammoniacal nitrogen, suspended solids. - TPH. - PAH. - PCB – in the vicinity of electrical substations or equipment. - VOC - Pesticides/herbicides. - PFAS -airside or where firefighting foams are used	Should significant groundwater contamination be recorded then a remediation options appraisal and strategy should be completed to mitigate any identified unacceptable risks.	Water wells located within the boundaries of the airport	Twice a year	Energy Center
Air Quality	Operational emissions and particulate matter	Monitoring during operation will be required to ensure the measures outlined in the ESIA are implemented. Prior to operation undertake VOC monitoring at the existing fuel farm to understand the likely contributions to VOC concentrations to understand if new fuel farm has the potential	Cease activities until appropriate mitigation can be applied to ensure activities are compliant.	Existing and new fuel farm area	Prior to operation	FTA

ESIA Topic	Monitoring Activity	Monitoring Description and Standards Applied	Response to Non- Conformity	Location	Frequency and duration	Responsible party
		to create VOC exceedances as predicted by the modelling Undertake VOC monitoring at the proposed fuel farm to monitor impacts at nearby receptors				
Noise	Operational Noise	Noise monitoring at sensitive receptors during operational phase	Cease activities until appropriate mitigation can be applied to ensure activities are compliant	Sensitive receptors	Monthly	FTA
Labour and OHS	Labour performance monitoring	Monthly monitoring of EPC Contractor labour performance including all construction contractors. Monitoring will include: • Workforce information • HR management • Grievance management • OHS management and risks control measures • Workers' accommodation management	Cease activities until appropriate health and safety risks control measures will be approved by the Safety officer.	All construction sites	Monthly monitoring throughout construction.	FTA
Community Grievances	Community grievance monitoring	Monthly monitoring of EPC Contractor community grievance management, including all construction contractors. Monitoring will include • Number of grievances raised by local communities during construction • Summary of types of grievances raised by communities (environmental issues, disturbance, etc.) and how they have been resolved • % of grievances resolved • % of grievances unresolved • % of grievances abandoned	All grievances that relate to the direct impacts of the construction activities on the local communities shall be considered immediately. Any works that raised grievances shall be stopped and mitigation applied before works restart. Report to the FTA on implemented mitigation measures and any reoccurrence.	All construction sites	Monthly	FTA
Labour and OHS	Monitoring of OHS hazards and risks and control measures in place	OHS monitoring should ensure all hazards and risks are managed in line with management plan and national requirements. New constructions, facilities, processes, operations and substances should be assessed within the OHS management system. Control and monitoring measures should be identified and included into the hazards and risks list and management plan.	All unsafe works should be stopped until Safety Officer approval of appropriate control measure. State labour monitoring (in line with labour authority audits plan)	All airport territory	Daily	FTA

5.4 Independent Auditing

The Lenders are accountable for arranging independent auditing of the Project. This is considered to be required given the IFC Performance Standards guidance notes state that projects require an independent environmental and/or a social expert to verify project monitoring information. This is also a requirement of the certified ESMS. The independent audit, including site visits conducted every six months and a desk-based audit every three months during the first three years of operation. In the following two years, audits are carried out annually.

The key objectives of the independent audits are as follows:

- The practical implementation of the ESMP and ESMS, including progress since the previous visit/review; and
- Feasible improvement objectives for completion before the next visit/review.

These audits are used to re-examine the continued appropriateness of the ESMP and ESMS, and also to provide advice on any updates required. Attention is given to lessons learnt in the light of experience. In particular, consideration is given to the implementation of the management plans and monitoring programmes.

These audits are considering all the environmental health and safety issues that form part of the ESMP and ESMS in operation phases. Of likely particular importance are:

- Solid waste management;
- Storage of chemicals and hazardous materials;
- Air quality;
- Noise;
- Groundwater monitoring.
- Stormwater and wastewater
- Energy and water consumption
- Physical hazards (moving equipment, strains, weather elements)
- Chemical Hazards
- Life and Fire Safety in areas accessible to public

Auditing social issues are also important, especially regarding labour rights and working conditions, , occupational health and safety, GBVH and grievances. The audit is need to verify that the Project commitments to worker's rights are implemented, with particular regards to:

- Use of child labour;
- Payment of minimum wages and overtime;
- Right of association and their right to organise and bargain collectively; communication of these and not preventing/retaliating when using rights,
- Ensuring no workers are charged fees to gain employment on the Project;
- Implementation of plans, procedures and training for occupational health and safety;
- Non-discrimination and equal opportunity; providing safe working environment for women

- Awareness raising on and prevention of GBVH
- Functioning and efficient labour grievance mechanism;
- The existence of human resource policies, job descriptions, written contracts;
- Provision of information to labour force regarding rights and working conditions; and
- Sufficiency of employee training activities.

Auditing social issues are include other social issues on:

- Development and delivery of SLIP, management of grievances on SLIP
- Delivery of SEP, meaningful engagement of stakeholders and management of grievances effectively
- Delivery of gender smart actions and GBVH measures identified in ESAP and ESMS