

Ankara-Nigde Motorway Project

Environmental and Social Action Plan (ESAP)

ERG Otoyol Yatırım ve İşletme A.Ş.

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Prepared for:

ERG Otoyol Yatırımve İşletme A.S.

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ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP)

No.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, IFC PS, EP, Best Practice)	Responsibility Resources, Investment Needs	Timetable	Indication of Completeness	Status
PS1	Assessment and Management of Environmental and Social Risks and Impacts						
1.1.	Develop and implement a project-specific Environment and Social Management System (ESMS) incorporating Environmental and Social; Human Resources; and Health and Safety policies based on the framework provided in the ESIA	-ESMS is required to be in place to avoid/minimize environmental and social risks -Contractors' implementation of ESMS is required to be ensured and strictly monitored -Benefit: Sound environmental and social performance ensured throughout the Project	-IFC PS1 -EP 4 -Best practice	Responsibility: Project Company (ERG Otoyol Yatirim ve Isletme A.S.); Construction Contractors (to implement) Resource need: Adequate financial and human resources; involvement of independent certification and audit companies; effective monitoring tools and personnel	Q3 2018 (for construction phase) (to be updated for operation phase prior to start of operations as necessary)	-Periodic Environmental and Social Monitoring Reports submitted to Lenders (covering the project-specific ESMS components) -Written Environmental and Social; Human Resources; and Health and Safety policies in place -Contractual agreements with contractors, sub-contractors and suppliers requiring implementation of project-specific ESMS -Valid ISO 9001, 14001 and OHSAS 18001 certifications in place (current certifications are valid until January 2019; renewal/extension required in Q1 2019)	
1.2.	Develop and implement necessary environmental and social management plans and procedures for the construction and operation phases of the Project.	-Required to avoid environmental and social risks that may emerge due to non-compliant situations -Contractors' implementation of management plans is required to be ensured and strictly monitored -Ensures full compliance with the requirements of applicable national legislation and achieve sound environmental and social performance meeting the requirements of international standards	-IFC PS1 -EP 4 -Best practice	-Responsibility: Project Company; Construction Contractors (to implement) -Resource need: Adequate financial and human resources for the development of plans, procedures; trainings to be provided to the Project personnel (inc. contractors) on the scope and implementation of the plans	Q2 2018 (to be updated for operation phase prior to start of operations as necessary)	-Following plans, procedures, etc. in place and implemented: <ul style="list-style-type: none"> o Environmental and Social Management and Monitoring Plan (prepared as part of ESIA) o Air Quality and GHG Management Plan o Chance Finds Procedure (prepared as part of ESIA) o Construction Camp Sites Management Plan o Community Health and Safety Plan o Contractor Management Plan o Emergency Preparedness and Response Plan o Environmental Monitoring and Training Program o Erosion Control and Management Plan o Grievance Mechanism (prepared as part of ESIA) o Labor Management Plan o Livelihood Restoration Plan Framework (LRPF) prepared as part of ESIA) o Noise and Vibration Management Plan o Occupational Health and Safety Plan 	

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						<ul style="list-style-type: none"> o Resettlement Action Plan Framework (RAPF) (prepared as part of ESIA) o Procurement Procedure o Stakeholder Engagement Plan (SEP) (prepared as part of ESIA) o Traffic Management Plan o Waste Management Plan o Water and Wastewater Management Plan <p>-Implementation of plans, procedures, etc. documented in periodic Environmental and Social Monitoring Reports submitted to Lenders (covering status of ESAP implementation as well)</p> <p>-Contractual agreements with contractors, sub-contractors and suppliers requiring implementation of management plans, procedures, etc.</p>	
1.3.	Establish and maintain an organizational structure and capacity that defines roles, responsibilities and authority to implement the ESMS	<ul style="list-style-type: none"> -Required to avoid any risk on effective ESMS implementation -Ensures effective and continuous implementation of ESMS 	<ul style="list-style-type: none"> -IFC PS1 -Best practice 	<p>Responsibility: Project Company; Construction Contractors</p> <p>Resource need: Adequate financial and human resources</p>	<p>Q3 2019</p> <p>(or the period when there will be on-going construction activities on all three sections simultaneously if this takes place later than Q3 2019; (to be updated for operation phase prior to start of operations as necessary)</p>	<ul style="list-style-type: none"> -Organizational structure established with key environmental and social personnel(s) positions filled; o Quality, Health, Safety and Environment (QHSE) Manager and Community Liaison Officer (CLO) employed by the Project Company throughout the construction and operation phases o At least 3 competent environmental experts (e.g. environmental engineer) appointed by the construction contractor o At least 3 competent personnel with community liaison responsibilities appointed by the construction contractor o At least 3 qualified cultural heritage expert (e.g. archaeologist) appointed by the construction contractor o Occupational health and safety experts appointed in all sections (number of experts will be in line with legislative requirements) or services are outsourced according to applicable legislation 	

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1.4.	Complete permitting requirements for construction and operation in line with applicable national legislation (see ESIA Table 2-3 for the list of main environmental permits and/or licenses)	-Land acquisition process is conducted and land use permits are acquired by the related governmental agencies; close collaboration is essential to avoid any risk on Project schedule -Ensures compliance with national legislation	-National legislative requirements -IFC PS1 -EP 3	Responsibility: Project Company; General Directorate of State Highways (KGM) and General Directorate of Agricultural Reform (GDAR) for land acquisition Resource needs: personnel with good knowledge of the requirements of the national legislation; cooperation with national authorities; allocation of necessary resources for the management of permitting processes; involvement of permitting consultants may be required for relevant aspects	Q3 2018 (for construction phase; on-going where necessary) Q2 2021 (for operation phase; if start of operation phase delays timetable would be revised accordingly)	-Relevant licenses, permits, approvals, agreements required under national law and regulations in place	
1.5.	Prepare and submit periodic Environmental and Social Monitoring Reports to Lenders (biannually during the construction phase and annually during the operation phase)	-Allows verification of effective ESMS implementation and compliance with national and international requirements	-IFC PS1 -EP 9 -Lenders' requirements	Responsibility: Project Company Resource: appointment of an Independent Environmental and Social Consultant, or require that the client retain qualified and experienced external experts to verify its monitoring information	Q1 2019	- Independent Environmental and Social Consultant appointed or qualified and experienced external experts retained to verify monitoring information -Periodic Environmental and Social Monitoring Reports submitted to Lenders (covering status of ESAP implementation as well)	
1.6.	Ensure periodic reporting to affected communities on Project activities and progress with implementation of the ESIA commitments/management plans (will be quarterly during the construction phase and annually during the operation phase)	-Ensures that stakeholders are adequately informed about Project's progress and environmental and social performance	-IFC PS1 -Voluntary	Responsibility: Project Company Resource: Adequate financial and human resources	Q4 2018	-On-going reporting provided to affected communities	

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1.7.	Disclose the ESIA Package in line with the SEP and keep the disclosed documents on public domain throughout the life of the Project (including any necessary updates)	-Helps stakeholders understand the Project impacts and opportunities and allow them to contribute	-IFC PS 1 -Voluntary and best practice	Responsibility: Project Company; Lenders (throughout the disclosure process) Resource: Adequate information technologies (IT) infrastructure	Q2 2018	-ESIA Disclosure Package available on Project company's web-site -NTS, SEP and ESMMP (in Turkish) available at construction camp sites and other locations in line with the Stakeholder Engagement Plan (SEP)	
1.8.	Implement the SEP and update it as necessary	-Helps to maintain good relationships with all stakeholders and sharing information with the public as well as project personnel -Requires good planning/ management, assigning personnel with good communication skills, responsiveness and financial resources	-IFC PS 1 -EP 5 -Voluntary and best practice	Responsibility: Project Company Resource need: Adequate financial and human resources	Q2 2018	-Up-to-date stakeholder engagement/consultation records (e.g. track sheets, logs, etc.) kept -Personnel with community liaison responsibilities assigned in each Project section -Printed Project information materials distributed to key stakeholders/affected communities -Periodic Environmental and Social Monitoring Reports submitted to Lenders (covering the status of SEP implementation as well)	
1.9.	Implement Grievance Mechanism in line with the SEP	-Effective implementation of the mechanism is essential to avoid any risk due to unresolved/ unmanaged grievances -Implementation of the grievance mechanism by construction contractors is required to be controlled and strictly monitored -Ensures continuous improvement of environmental and social performance and helps to good relationships with the stakeholders/local communities	-IFC PS 1 -EP 6 -Voluntary and best practice	Responsibility: Project Company; Construction Contractors (to implement) Resource need: Adequate financial and human resources	Q2 2018	-Grievance Procedure in place and implemented (e.g. grievance forms are available at key locations in line with the SEP; grievance logs maintained) -Specific personnel assigned for the management of grievances -Training records of the personnel responsible from the management of grievances -Grievance records, register and close-out forms	
1.10.	Develop and implement a Corporate Responsibility/ Community Development Program/Plan (CSR/CDP)	-Allows contribution to community development -Good reputation for the Project Company and the Project -Requires needs assessment and good planning/management	-IFC PS1 -Voluntary	Responsibility: Project Company Resource need: Adequate financial and human resources; involvement of consultants	Q1 2019	-Progress with CSR/CDP activities documented in Periodic Environmental and Social Monitoring Reports submitted to Lenders and disclosed to public as part of on-going reporting provided to affected communities	

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PS2	Labor and Working Conditions						
2.1.	Develop and implement Human Resources Policy and relevant plans, procedures, etc. in line with national legislation, IFC PS2 and core conventions of ILO	-Ensures compliance with national legislation and IFC PS2 requirements, maintaining good worker-management relationships -Minimizes the risks associated with personnel and contractor displeasure	-National legislative requirements -IFC PS2 -Relevant ILO Conventions -Best practice	Responsibility: Project Company; Construction Contractors (to implement) Resource need: Adequate financial and human resources; involvement of competent labor auditor	Q2 2018 (to be updated for operation phase prior to start of operations as necessary)	-Written Project-specific Human Resources Policy and relevant procedures in place -Company handbooks/labor agreement/contract templates covering the worker relationship requirements of IFC PS2 provided/communicated to all personnel -Labor Management Plan in place -Contractual agreements with contractors, sub-contractors and suppliers requiring implementation of Project's policies and management plans, procedures, etc. -Statistics on workforce (inc. breakdown of direct and contracted workers, ratio of people hired from the local)	
2.2.	Develop and implement a Project-specific Construction Camp Sites Management Plan, ensuring adequate worker's accommodation conditions (on-site and if relevant off-site) in line with the national requirements, ILO standards and "IFC/EBRD Guidance Note on Workers' Accommodation: Processes and Standards".	-Ensures compliance with national legislation and IFC PS2 requirements, maintaining good worker-management relationships -Minimizes the risks associated with personnel and contractor displeasure -Minimizes the health risks associated with inadequate accommodation conditions	-National legislative requirements -IFC PS2 -IFC/EBRD Guidance Note on Workers' Accommodation: Processes and Standards -Relevant ILO Conventions -Best practice	Responsibility: Project Company; Construction Contractors Resource need: Adequate financial resources; sufficient land for establishment of adequate accommodation facilities; involvement of labor auditor(s)	Q1 2019	-Construction Camp Sites Management Plan in place -Statistics on workforce using on-site accommodation facilities -Labor Audit Report(s) verifying worker/contractor accommodation conditions provided in line with the requirements described in the "IFC/EBRD Guidance Note on Workers' Accommodation: Processes and Standards"	
2.3.	As part of the Health and Safety Policy, develop and implement Occupational Health and Safety Policy and relevant plans, procedures to ensure a safe working environment	-Ensures compliance with national legislation and IFC PS2 requirements, other international standards -Minimizes occupational risks on personnel health and safety such as injuries/fatalities due to accidents	-National legislative requirements -IFC PS2 -Relevant ILO Conventions -Best practice	Responsibility: Project Company; Construction Contractors (to implement) Resource need: Adequate financial and human resources; provision/procurement of necessary safety/warning signs and personal protective equipment (PPE); trainings to be	Q2 2018 (to be updated for operation phase prior to start of operations as necessary)	-Written Project-specific Health and Safety (covering occupational health and safety) Policy and relevant procedures in place -Incident/accident statistics of all Project personnel -Training records	

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				provided to the Project personnel (inc. contractors); external training specialists may be involved			
2.4.	Implement the Grievance Mechanism for workers (including direct employees and contracted workers) in line with the SEP	-Ensures compliance with IFC PS2 requirements, maintaining good worker-management relationships, minimises the operational, financial and reputational risks associated with personnel and contractor displeasure -Workers (including direct employees and contracted workers) are to be ensured that there is no risk of retribution or retaliation of the grievant and encouraged to use the mechanism	-IFC PS2 -Best practice	Responsibility: Project Company; Construction Contractors (to implement) Resource need: provision of necessary tools (grievance boxes, etc.) provided at construction camp/work sites; notification of the workers about the presence and functionality of the grievance mechanism	Q2 2018	-Grievance Procedure in place and implemented (e.g. grievance forms are available at construction camps site and other works sites) -Grievance records register and close-out forms	
PS3	Resource Efficiency and Pollution Prevention						
3.1.	Conduct air quality monitoring during the construction and operation phases of the Project in line with the ESMMP and evaluate the results with respect to applicable national requirements and Project standards Develop, implement and update (as necessary based on the monitoring results) the Air Quality and Greenhouse Gas (GHG) Management Plan	-Ensures good ambient air quality levels. -Ensures compliance with IFC PS 3, national and international standards.	-National legislative requirements -IFC PS 3 -Best practice	Responsibility: Project Company; Construction Contractors (to implement)	Q3 2018 (on-going throughout the BOT Concession Period; quarterly during construction phase and first year of operation; biannually in the remainder of operation phase)	- Air Quality and Greenhouse Gas (GHG) Management Plan in place and implemented Laboratory result forms on air quality measurements	
3.2.	Update annual GHG quantifications based on the actual construction machinery and vehicles involved in the activities, fuel consumption records, etc.	-Ensures compliance with IFC PS 3, EP 2, and international best practice.	-IFC PS3 -EP 2 -Best practice	Responsibility: Project Company	Annually during construction phase	-Annual updated GHG quantification results and records on GHG contributors -Training records for targeting reduction of GHG emissions during construction activities	

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3.3.	Update annual GHG quantifications based on the actual records of annual traffic volumes and technology after the commissioning of Motorway; publicly report GHG emission levels (combined Scope 1 and Scope 2 Emissions) during the operational phase for if the calculations/records indicate that the Project is emitting over 100,000 tonnes of CO2 equivalent annually.	-Ensures compliance with IFC PS 3, EP 2, EP 10 and international best practice.	-IFC PS3 -EP 2 -EP 10 -Best practice	Responsibility: Project Company	Q2 2022 (if start of operation phase delays timetable would be revised accordingly)	-Annual updated GHG quantification results and records on GHG contributors	
3.4.	Conduct noise monitoring during the construction and operation phases of the Project in line with the ESMMP and evaluate the results with respect to applicable national requirements and Project standards Develop, implement and update (as necessary based on the monitoring results) the Noise and Vibration Management Plan	--Provides noise measurement data which can further be considered in taking appropriate measures at sensitive receptors. -Ensures compliance with IFC PS 3, as well as national and international standards and best practices	-National legislative requirements -IFC PS 3	Responsibility: Project Company	Q3 2018 (on-going throughout the BOT Concession Period; quarterly during construction phase and first year of operation; biannually in the remainder of operation phase)	- Noise and Vibration Management Plan in place and implemented -Laboratory result forms on noise and vibration measurements -Grievance records	
3.5.	Develop and implement a Project-specific Water and Wastewater Management Plan, covering both construction and operation phases of the Project	-Water and Wastewater Management Plan will set forth necessary measures to protect water resources in terms of quantity and quality. -Ensures compliance with IFC PS 3, as well as national legislation and best practices	-National legislative requirements -IFC PS 3 -Best practice	Responsibility: Project Company; Construction Contractors (to implement)	Q2 2018 (on-going through construction and operation phases of the Project)	-Water and Wastewater Management Plan in place and implemented	
3.6.	Develop and implement an Erosion Control and Management Plan, covering both construction and operation phases of the Project	-Implementation of the Erosion Control and Management Plan will ensure protection of soil and water resources, and prevention of potential soil-related hazards. -Ensures compliance with IFC PS 3, as well as national legislation and best practices	-National legislative requirements -IFC PS 3 -Best practice	Responsibility: Project Company; Construction Contractors (to implement)	Q2 2018 (on-going through construction and operation phases of the Project)	-Erosion Control and Management Plan in place and implemented	

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3.7.	Develop and implement a Project-specific Waste Management Plan, covering both construction and operation phases of the Project.	-Waste to be generated due to Project activities will be managed appropriately to prevent pollution and further impact on soil, water and natural resources. -Ensures compliance with IFC PS 3, as well as national legislation and best practices	-National legislative requirements -IFC PS 3 -Best practice	Responsibility: Project Company; Construction Contractors (to implement)	Q2 2018 (on-going through construction and operation phases of the Project)	-Waste Management Plan in place and implemented -Waste storage areas properly built and maintained	
PS4	Community Health, Safety, and Security						
4.1.	Develop and implement a Project-specific Community Health and Safety Plan	-Ensures compliance with national legislation and IFC PS 4 and best practice. - Avoid risks to members of the community due to security personnel hired to guard the camp/work sites	-National legislative requirements -IFC PS 4 -IFC Good Practice Handbook on Use of Security Forces -Best practice	Responsibility: Project Company; Construction Contractors (to implement)	Q2 2018 (on-going throughout construction and operation)	-Community Health and Safety Plan in place and implemented -Training records of security personnel on code of conduct and use of force to ensure compliance with IFC PS 4 and Good Practice Handbook on Use of Security Forces -Grievance records	
4.2.	Develop and implement a Project-specific Traffic Management Plan	-Implementation of the Traffic Management Plan will prevent/minimize traffic incidents/accidents. -Ensures compliance with PS 4 and best practice.	-IFC PS 4 -Best practice	Responsibility: Project Company; Construction Contractors (to implement)	Q2 2018 (on-going throughout construction and operation)	-Traffic Management Plan in place and implemented -Reported number of incidents/accidents -Grievance records	
4.3.	Develop and implement a Project-specific Emergency Preparedness and Response Plan, covering both construction and operation phases of the Project.	-The Plan will provide the necessary tools to manage emergency situations and allow for collaboration with communities and related authorities/emergency services. -Ensures compliance with PS 2, PS 4 and best practice.	-National legislative requirements -IFC PS 2 -IFC PS 4 -Best practice	Responsibility: Project Company; Construction Contractors (to implement) Resource need: Adequate financial and human resources	Q2 2018 (on-going throughout construction and operation)	-Emergency Preparedness and Response Plan in place and implemented -Grievance records	
PS5	Land Acquisition and Involuntary Resettlement						
5.1.	Implement the Livelihood Restoration Plan (LRP) Framework; based on this framework and in liaison with KGM develop and implement a LRP in line with IFC PS5	-Land acquisition process is conducted and land use permits are acquired by the related governmental agencies; close collaboration is essential to avoid any risk on Project schedule -Ensures compliance with PS 5 and international best practices	-National legislative requirements -IFC PS 5 -Best practice	Responsibility: Project Company Resource need: Adequate financial and human resources; involvement of external experts may be required	Q3 2018 (through 3 years starting from the financial close)	-LRP in place	

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5.2.	Implement the Resettlement Action Plan (RAP) Framework; based on this framework and in liaison with KGM develop and implement a RAP in line with IFC PS5.	-Land acquisition process is conducted and land use permits are acquired by the related governmental agencies; close collaboration is essential to avoid any risk on Project schedule -Ensures compliance with PS 5 and international best practices	-National legislative requirements -IFC PS 5 -Best practice	Responsibility: Project Company Resource need: Adequate financial and human resources; involvement of external experts may be required	Q3 2018 (through 3 years starting from the financial close)	-RAP in place	
5.3.	Ensure a completion audit is in place to verify that LRP/RAP implementation achieved their objectives	-Land acquisition process is conducted and land use permits are acquired by the related governmental agencies; close collaboration is essential to avoid any risk on Project schedule	-IFC PS 5 -Best practice -Voluntary	Responsibility: Project Company Resource need: Adequate financial and human resources; involvement of external experts may be required	Following completion of LRP/RAP implementation	-Completion audit report prepared (in line with IFC Guidance Note on PS5, Annex B)	
PS6	Biodiversity Conservation and Sustainable Management of Living Natural Resources						
6.1.	Conduct biodiversity field surveys by qualified external experts along the Motorway route to complement the baseline information	-Up-to-date data on biodiversity features and protected areas along the Motorway will allow for site-specific information on the statuses of natural elements and detailed impact and critical habitat analyses. -Ensures compliance with PS6 and international best practices	-IFC PS6 -Best practice	-Responsibility: Project Company; external experts (to conduct the field surveys) -Resource need: Adequate financial and human resources; involvement of external experts	Q2 2018	-Field survey data to be acquired and reported, together with assessments on current statuses of habitats and species	
6.2.	Develop and implement Biodiversity Action Plan (BAP) based on the field surveys conducted and all other biodiversity data available	-BAP will provide habitat and species-specific action plans to ensure that there is no-net-loss of habitats and species' populations along the Project route. -As a living document BAP will be due for revisions and updates as the Project proceeds, allowing to reflect any additional measures required to be taken for conservation of habitats and species. -Ensures compliance with PS6.	-IFC PS6	-Responsibility: Project Company; external experts (to perform necessary actions in line with the BAP whenever required) -Resource need: Adequate financial and human resources; involvement of external experts	Q3 2018	-Written BAP in place -BAP is updated whenever new data/information becomes available with respect to habitats and species	

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6.3.	Develop and implement a Landscape Project	-The Landscape Project will set forth necessary strategies and measures to restore and reinstate natural vegetation along the Motorway, conserving species' habitats through site-specific techniques. -Ensures compliance with KGM Technical Specifications and PS6.	-KGM Technical Requirements -IFC PS6	-Responsibility: Project Company; Construction Contractors (to implement); external experts (to provide input on natural elements) -Resource need: Adequate financial and human resources; involvement of external experts	Prior to operation and on-going throughout operation	-Landscape Project in place	
PS7 Indigenous Peoples							
7.1.	N/A	N/A	N/A	N/A	N/A	N/A	N/A
PS8 Cultural Heritage							
8.1.	Implement the Cultural Heritage Management Plan (CHMP) and the Chance Find Procedure where necessary	-Ensures compliance with national legislation and PS8. -Avoid risks on known and unknown cultural heritage during construction.	-National legislative requirements -IFC PS8	Responsibility: Project Company; Construction Contractors (to implement) Resource need: archaeologists/cultural heritage experts at construction sites; trainings provided to construction personnel	Q2 2018 (throughout the construction phase)	-Records of trainings provided to construction personnel regarding the implementation of Chance Find Procedure and CHMP -Chance Find Report Forms issued -Up-to-date Chance Find Register Forms -Grievance records	
8.2.	Notify related national authorities about the non-registered cultural heritage sites (located in Project's land acquisition corridor) identified in the ESIA Report and collaborate with them regarding the management of those sites	-Ensures compliance with national legislation and PS8.	-National legislative requirements -IFC PS8	Responsibility: Project Company; KGM (correspondence will be through KGM as the Project owner) Resource need: logistic support may need to be provided to cultural heritage authorities for their field investigations; management time	Q3 2018	-Official correspondence if available -Consultation records	

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8.3.	Consult with KGM and related cultural heritage authorities regarding the Golludag Archaeological Site and take necessary actions in line with the directions/decisions of the authorities	-Ensures compliance with national legislation and PS8.	-National legislative requirements -IFC PS8	Responsibility: Project Company; KGM (to collaborate) Resource need: Human resources	Prior to start of construction works at the corresponding Motorway KM	-Consultation records	

