



Elazığ Integrated Health Campus Project Environmental and Social Action Plan (ESAP)

April 2017

Prepared for

ELZ Sağlık Yatırım A.Ş.



a company of



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1. Pre-Construction Phase ESAP

Number	Issue/Action	Legal Framework EBRD PR / IFC PS	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
PR1: Environmental and Social Appraisal and Management					
1	<p>Environmental and Social Management System (ESMS)</p> <ul style="list-style-type: none"> • Definition of an ESMS Policy (including environmental, health, safety and social aspects) • Develop and implement an ESMS in line with international good practice and guidelines (i.e. ISO 9001: 2008, ISO 14001: 2004, OHSAS 18001: 2007) • Establish an organizational structure for the implementation of the ESMS • Appoint a qualified Environmental and Social Manager/Team • Prepare and put in place site specific procedures/plans for construction phase including the following: <ul style="list-style-type: none"> ○ Air Quality Control and Monitoring Plan ○ Noise Control and Monitoring Plan ○ Waste Management Plan (covers all wastes including solid, medical and hazardous waste) ○ Hazardous Material Management Plan ○ Emergency Preparedness and Response Plan ○ Construction Camp Management Plan ○ Construction Traffic Management Plan ○ Human Resources Management Plan ○ Occupational Health and Safety Management Plan ○ Community Health and Safety Management Plan ○ Security Plan ○ Archaeological Chance Find Management Plan ○ Subcontractor Management and Monitoring Plan <p>Provide training for designated staff on environmental and social topics and implementation of the abovementioned site specific plans</p>	<p>EBRD PR1/PR2</p> <p>IFC PS1/PS2</p> <p>Best practice</p> <p>IFC General EHS Guidelines</p>	<ul style="list-style-type: none"> • An approved and announced ESMS Policy • An established and implemented ESMS and relevant documentation (risk assessments, plans, procedures, control forms, etc.) • An established organizational structure and defined roles for ESMS • Appoint Environmental and Social Manager/Team • Written and approved site specific environmental and social plans/procedures • ESMS system records (audit records, measurement records, training records etc.) 	Prior to financial close	Contractor of ELZ A.Ş.
2	<p>Permitting</p> <ul style="list-style-type: none"> • Prepare and implement a “Legal and Other Requirements Determination and Compliance Procedure” 	National legislation	<ul style="list-style-type: none"> • A written and approved “Legal and Other Requirements Determination and Compliance Procedure” • A comprehensive Legal and Other 	Prior to the date on which	Contractor of ELZ A.Ş.

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Number	Issue/Action	Legal Framework EBRD PR / IFC PS	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	<ul style="list-style-type: none"> Determine legal permits/consents/approvals needed to be obtained before starting construction and prepare a "Legal and Other Requirements Follow-up List" covering permits/consents/approvals Obtain all necessary permits/consents/approvals (including construction permit) 		Requirements Follow-up List <ul style="list-style-type: none"> Records of permits, official letters, licenses, approvals, documents etc. 	construction permit is obtained	
3	Use of Project area <ul style="list-style-type: none"> Make agreement with the Ministry of Health (MoH) for the use of the Project site 	National legislation	<ul style="list-style-type: none"> Agreement made with the MoH for the use of the Project site 	Prior to the date on which construction permit is obtained	MoH and Contractor of ELZ A.Ş.
4	Seismic risk <ul style="list-style-type: none"> Design the Project in accordance with Turkish regulations and standards for protection against seismic activity Comply with the Regulation on Buildings to be constructed in Seismic Zones and take into account the defined parameters to be used in the design of structures located in 2nd degree seismic zone where the Project area is located 	National legislation	<ul style="list-style-type: none"> Design records 	Prior to construction phase	Contractor of ELZ A.Ş.
5	Traffic study and planning <ul style="list-style-type: none"> Completion of the detailed traffic study to identify the existing baseline conditions for the road network near the IHC site, to undertake traffic modeling for future conditions and a quantification of the transportation alternatives (the study has already been assigned to a traffic consultant, the initial results were received in February 2015 and the study is expected to be completed by the date on which construction permit is obtained) 	EBRD PR1 IFC PS1	<ul style="list-style-type: none"> Traffic Study Report 	Prior to the date on which construction permit is obtained	Contractor of ELZ A.Ş.
6	Construction methods <ul style="list-style-type: none"> Development of documentation for construction methods for each construction activity Development of method statements in line with good practice to manage and monitor construction phase environmental and social issues 	EBRD PR1 IFC PS1	<ul style="list-style-type: none"> Construction methods Method statements 	Prior to each construction activity	Contractor of ELZ A.Ş.

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7	Subcontractors <ul style="list-style-type: none"> • Include clauses in contracts requiring compliance with the Project HR Policy, ESMP, ESAP and other project specific plans • Develop a Subcontractor Management and Monitoring Plan 	EBRD PR1/PR2 IFC PS1/PS2	<ul style="list-style-type: none"> • Subcontractor Management and Monitoring Plan 	Prior to construction	Contractor of ELZ A.Ş.
PR 2: Labour and Working Conditions					
8	Local employment and procurement <ul style="list-style-type: none"> • Develop local employment and purchasing policies 	EBRD PR2 IFC PS2	<ul style="list-style-type: none"> • Copies of relevant policies • Records of procurement of goods and services 	Prior to construction	Contractor of ELZ A.Ş.
9	Labor <ul style="list-style-type: none"> • Develop a Worker Code of Conduct to manage worker's behavior inside the construction site, camp and outside 	EBRD PR2 IFC PS2	<ul style="list-style-type: none"> • Worker Code of Conduct 	Prior to construction	Contractor of ELZ A.Ş.
10	Human Resources (HR) <ul style="list-style-type: none"> • Develop a HR Policy in line with IFC PS2/EBRD PR2 and ensure all workers are aware of its content • Develop Human Resources Management Plan • Develop worker contracts setting out working conditions, terms of employment and EHS responsibilities • Insure all workers under Social Security Institution (SSI) 	EBRD PR2 IFC PS2	<ul style="list-style-type: none"> • HR Policy • HR Management Plan • Worker contracts • SSI Records 	Prior to construction	ELZ A.Ş. and Contractor of ELZ A.Ş.
11	Occupational Health and Safety <ul style="list-style-type: none"> • Develop an Occupational Health and Safety Plan to identify health and safety risks of each activity during construction followed by identification of the appropriate mitigation measures/personal protective equipment • Provide safety and induction training to workers • Provide first-aid training to relevant number of workers as required by national legislation 	EBRD PR2 IFC PS2 National legislation	<ul style="list-style-type: none"> • Occupational Health and Safety Plan • Training records 	Prior to construction	Contractor of ELZ A.Ş.
12	Worker's grievance <ul style="list-style-type: none"> • Develop a grievance mechanism for workers 	EBRD PR2 IFC PS2	<ul style="list-style-type: none"> • Documented worker grievance mechanism 	Prior to construction	Contractor of ELZ A.Ş.

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13	<p>Worker's accommodation</p> <ul style="list-style-type: none"> • Manage workers' accommodation in line with the provisions of IFC PS2 and EBRD PR2 and the guidance note on worker's accommodation published by IFC and EBRD (Worker's Accommodation: Processes and Standards) under Construction Camp Management Plan 	<p>EBRD PR2 IFC PS2</p>	<ul style="list-style-type: none"> • Construction Camp Management Plan 	Prior to construction	Contractor of ELZ A.Ş.
PR 3: Pollution Prevention and Abatement					
14	<p>Waste/ Wastewater</p> <ul style="list-style-type: none"> • Confirm the municipality's capacity to handle solid waste, construction waste, wastewater and medical waste • Obtain necessary permit related with the disposal of excavated soil 	<p>EBRD PR3 IFC PS3 Best Practice</p>	<ul style="list-style-type: none"> • Official correspondence with the relevant authorities • Permit for disposal of excavated soil 	Prior to construction	Contractor of ELZ A.Ş.
PR 4: Community Health, Safety and Security					
15	<p>Community Health and Safety</p> <ul style="list-style-type: none"> • Develop a Community Health and Safety Management Plan • Develop Emergency Preparedness and Response Plan • Develop Construction Traffic Management Plan • Develop a Security Plan 	<p>EBRD PR4 IFC PS4</p>	<ul style="list-style-type: none"> • Community Health and Safety Management Plan • Emergency Preparedness and Response Plan • Construction Traffic Management Plan • Security Plan 	Prior to construction	Contractor of ELZ A.Ş.
16	<p>Life and Fire Safety</p> <ul style="list-style-type: none"> • Design the health campus in full compliance with the "Regulation on the Protection of Buildings from Fire" Official Gazette 26735 Date 19.12.2007 • When local standards are not sufficiently detailed and are incomplete, apply internationally accepted life and fire standards (NFPA standards, IBC Codes and EN standards). For this reason, undertake mapping of Turkish requirements for life and fire safety in order to identify the insufficient areas and incorporate them into the design based on the international standards. This will include special measures taken for the forensic psychiatric hospital in order to avoid additional risks that can be posed by enforced security in case of fire. • Hire a qualified third party life and fire safety consultant to review 	<p>EBRD PR4 IFC PS4 NFPA</p>	<ul style="list-style-type: none"> • Third party audit report for Life and Fire Safety Plan • 	Prior to construction	Contractor of ELZ A.Ş.

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	life and fire safety acceptable for EBRD/IFC. The consultant shall review the life and fire safety design against Turkish legal requirements as well as NFPA, and shall make recommendations if any significant issues are identified				
PR 8: Cultural Heritage					
17	<p>Chance Finds</p> <ul style="list-style-type: none"> Develop an Archaeological Chance Find Management Plan to be applied in the event of an archaeological discovery during construction activities 	EBRD PR8 IFC PS8	<ul style="list-style-type: none"> Archaeological Chance Find Management Plan 	Prior to construction	Contractor of ELZ A.Ş.

2. Construction Phase ESAP

Number	Issue/Action	Legal Framework EBRD PR / IFC PS	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
PR1: Environmental and Social Appraisal and Management					
1	<p>ESMS</p> <ul style="list-style-type: none"> • Implementation of ESMS, ESMP and the following plans: <ul style="list-style-type: none"> ○ Air Quality Control and Monitoring Plan ○ Noise Control and Monitoring Plan ○ Waste Management Plan ○ Hazardous Material Management Plan ○ Emergency Preparedness and Response Plan ○ Construction Camp Management Plan ○ Construction Traffic Management Plan ○ Human Resources Management Plan ○ Occupational Health and Safety Management Plan ○ Community Health and Safety Management Plan ○ Security Plan ○ Archaeological Chance Find Management Plan ○ Subcontractor Management and Monitoring Plan 	<p>EBRD PR1 IFC PS1 Best practice</p>	<ul style="list-style-type: none"> • Required documentation as per ESMS, ESMP and specific plans (e.g. permits, consents, official correspondence, monitoring results, construction site audit reports and similar) • Training records of workers 	<p>During construction phase</p>	<p>Contractor of ELZ A.Ş.</p>
2	<p>ESMS/ESMP Compliance</p> <ul style="list-style-type: none"> • Monthly progress reporting to IFC and EBRD 	<p>EBRD PR1 IFC PS1</p>	<ul style="list-style-type: none"> • Monthly progress reports 	<p>During construction phase</p>	<p>ELZ A.Ş.</p>
3	<p>Permitting</p> <ul style="list-style-type: none"> • Obtain all necessary permits/consents/approvals as needed during the construction phase • A Project Description Report for the boilers and trigeneration plant should be prepared and submitted to the Provincial Directorate of Environment and Urbanisation (PDEU) and related consent should be secured before the installation of the technical service building. • The groundwater usage permits for the wells need to be provided according to their utilization purposes in line with the Regulation on DSI Groundwater Measurement System (Official Gazette No. 28793 dated October 12, 2013), which states that a flow meter should be installed to compare utilisation rates with allotment values for the well with water use certificate. 	<p>EBRD PR1 IFC PS1 National legislation</p>	<ul style="list-style-type: none"> • Records of permits, official letters, licenses, approvals, documents and similar 	<p>During construction phase</p>	<p>Contractor of ELZ A.Ş.</p>

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4	Construction quality <ul style="list-style-type: none"> Undertake construction activities for protection against seismic activity in line with the relevant regulation 	National legislation	<ul style="list-style-type: none"> Construction inspection records 	Prior to/during construction phase	Contractor of ELZ A.Ş.
5	Construction methods <ul style="list-style-type: none"> Development of documentation for construction methods for each construction activity Development of method statements in line with good practice to manage and monitor construction phase environmental and social issues 	EBRD PR1 IFC PS1	<ul style="list-style-type: none"> Construction methods Method statements 	Prior to each construction activity	Contractor of ELZ A.Ş.
PR 2: Labour and Working Conditions					
6	Human Resources <ul style="list-style-type: none"> Implement Human Resources Management Plan Issue contracts to workers upon recruitment Keep files of all workers that include their work contracts, training records, medical surveillance records, next of kin contact details and similar Develop a database of employees and subcontractor employees that includes information on the age, social security number, identity card number, gender, ethnicity, nationality and home town. Payroll checks by EPC contractor against issues such as sub-contractor wage rates, payment of benefits and timely payments. 	EBRD PR2 IFC PS2	<ul style="list-style-type: none"> Worker contracts Personnel files Database of employees Short quarterly reports available for review by external monitors 	During construction phase	Contractor of ELZ A.Ş.
7	Occupational Health and Safety <ul style="list-style-type: none"> Implementation of Occupational Health and Safety Management Plan in line with IFC/EBRD requirements and national legislation Provide necessary trainings to workers Record all accidents and incidents Comply with health and safety legislation applicable to the construction phase of the Project 	EBRD PR2 IFC PS2 IFC EHS Guidelines IFC EHS Guidelines for Health Care Facilities National legislation	<ul style="list-style-type: none"> Occupational Health and Safety Plan Records of audit reports, regular inspections, trainings for workers and similar Accident and incident logs Records of corrective actions 	During construction phase	Contractor of ELZ A.Ş.

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8	<p>Worker's grievances</p> <ul style="list-style-type: none"> Publicize the Grievance Mechanism to workers Implementation of Grievance Mechanism Respond to grievances in a timely manner Undertake necessary corrective actions if needed 	<p>EBRD PR2 IFC PS2</p>	<ul style="list-style-type: none"> Grievance log including records of grievances, response to grievances and corrective actions 	<p>During construction Phase</p>	<p>Contractor of ELZ A.Ş.</p>
9	<p>Worker's accommodation</p> <ul style="list-style-type: none"> Undertake internal and external (by a third party) regular audits at worker's accommodation facilities within the frequency required by EBRD/IFC Implement Construction Camp Management Plan 	<p>EBRD PR2 IFC PS2</p>	<ul style="list-style-type: none"> Audit reports 	<p>During construction Phase</p>	<p>Contractor of ELZ A.Ş.</p>
10	<p>Subcontractors</p> <ul style="list-style-type: none"> Implementation of Subcontractor Management and Monitoring Plan that includes checking of subcontractors to verify they are reputable and legitimate enterprises Prepare a subcontractor list Require subcontractors to manage their workers in line with Project's HR policy and adopt grievance mechanism through contract clauses Require subcontractors to adhere to the Project's EHS policies and plans through contract clauses Require subcontractors to report accidents, incidents and safety non-compliances through contract clauses 	<p>EBRD PR2 IFC PS2</p>	<ul style="list-style-type: none"> Contracts with subcontractors Subcontractor list Records of subcontractor's accidents, incidents and non-compliances Subcontractor personnel files Subcontractor training records for EHS Evidence of how workers are informed about the grievance mechanism Grievance log 	<p>During construction Phase</p>	<p>Contractor of ELZ A.Ş.</p>
11	<p>Supply of materials</p> <ul style="list-style-type: none"> Supply materials as close as possible to the Project site Prepare a supplier list Supply materials from licensed/certificated/permited suppliers/facilities Prefer to the extent possible recycled materials and materials certified as "green" and low carbon 	<p>EBRD PR2 IFC PS2 Best Practice</p>	<ul style="list-style-type: none"> Records of supply sources Supplier List Licenses/certificates/permits of the suppliers 	<p>During construction phase</p>	<p>Contractor of ELZ A.Ş.</p>
PR 3: Pollution Prevention and Abatement					
12	Soil, Surface Water and Groundwater	EBRD PR3	<ul style="list-style-type: none"> Records of periodical site inspections 	<p>During</p>	<p>Contractor of ELZ</p>

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	<ul style="list-style-type: none"> • Adopt good construction site practices for the protection of soil, surface water and groundwater (e.g storage areas, spillage control, spill kits etc.) • Keep spill response kits at designated areas with specific instructions for their use and train site staff on the use of spill kits. • Implement following plans: <ul style="list-style-type: none"> ○ Hazardous Material Management Plan ○ Emergency Preparedness and Response Plan ○ Waste Management Plan • Train construction workers • In order to minimize the flooding risk posed by the intermittent stream observed in the Project area, ELZ A.S. needs to install an appropriate conduit system in the stream bed that would allow the natural flow of the stream meanwhile protecting the area from a possible flood. DSI should be informed and the installation of the water pipe should be carried out following the opinion of DSI on the issue. 	<p>IFC PS3 Best practice National legislation</p>	<ul style="list-style-type: none"> • Presence of spill response kits on construction site • Records of monitoring of the implementation of the relevant plans • Audit and control results, spillage incident records, measurement results, contaminated soil disposal records, training records and similar • Conduit system in the stream bed 	construction phase	A.Ş.
13	<p>Hazardous materials</p> <ul style="list-style-type: none"> • Implement Hazardous Material Management Plan <ul style="list-style-type: none"> ○ Prepare an inventory of hazardous materials ○ Obtain Material Safety Data Sheets (MSDSs) and provide in relevant locations in both English and Turkish ○ Make Personal Protective Equipment (PPE) available for relevant personnel ○ Train relevant personnel ○ Take required onsite measures ○ Keep hazardous materials at designated areas • Locate suitable fire-fighting equipment close to hazardous material storage/usage areas 	<p>EBRD PR3/PR4 IFC PS3/PS4 Best Practice National legislation</p>	<ul style="list-style-type: none"> • Records of audits • Hazardous material inventory • Site inspections • Incident records • Training records 	During construction phase	Contractor of ELZ A.Ş.
14	<p>Waste management</p> <ul style="list-style-type: none"> • Implement following plans: <ul style="list-style-type: none"> ○ Waste Management Plan ○ Emergency Preparedness and Response Plan 	<p>EBRD PR3 IFC PS3 Best practice</p>	<ul style="list-style-type: none"> • Records of periodic site inspections conducted to check all wastes are separately collected, segregated, labeled and stored in designated 	During construction phase	Contractor of ELZ A.Ş.

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	<ul style="list-style-type: none"> ○ Hazardous Material Management Plan ● Collect, segregate label and store, transport, recycle wastes in line with the Waste Management Plan ● Design and construct a designated waste storage area to ensure that hazardous wastes are properly stored at the construction site ● Dispose wastes at licensed facilities according to their category in accordance with regulatory requirements ● Keep records of waste generation, storage and disposal ● Use licensed haulers for the transport of wastes and keep waste transfer certificates ● Ensure disposal of wastes at licensed facilities ● Train site workers for waste management practices 	National legislation	<ul style="list-style-type: none"> ● areas ● Disposal records of all types of wastes ● Disposal records of excavated soil ● Check waste disposal contracts ● Licenses of haulers' and disposal facilities' ● Declaration records made to the Ministry of Environment and Urbanisation (MoEU) ● Training records of staff 		
15	<p>Wastewater</p> <ul style="list-style-type: none"> ● Discharge domestic wastewater to the municipality infrastructure in accordance with the permits and protocols for connection to the municipal sewer system ● Monitor effluent regularly as required by Elazığ Water and Sewage Administration 	EBRD PR3 IFC PS3 National legislation	<ul style="list-style-type: none"> ● Municipal sewer system connection certificate obtained from the relevant authority ● Regular effluent analysis results 	During construction phase	Contractor of ELZ A.Ş.
16	<p>Air Emissions (dust, exhaust emissions)</p> <ul style="list-style-type: none"> ● Implement Air Quality Control and Monitoring Plan ● Implement Construction Traffic Management Plan ● Undertake air quality measurements for PM₁₀ monthly for the first three months of construction, continue the monthly measurements if the limit values are exceeded; otherwise, conduct the measurements quarterly. 	EBRD PR3 IFC PS3 National legislation	<ul style="list-style-type: none"> ● Records of site inspections ● Records of air quality monitoring undertaken by a third-party ● Equipment and vehicle maintenance records ● Training records of workers and drivers 	During construction phase	Contractor of ELZ A.Ş.
17	<p>Noise</p> <ul style="list-style-type: none"> ● Implement Noise Control and Monitoring Plan ● Obtain consent from Elazığ Provincial Directorate of Environment and Urbanisation in case construction activities are conducted during evening and night time ● Undertake noise measurements at the closest sensitive receptors (3 locations as identified in the ESIA report) for 24 hours. It is suggested that noise measurements are conducted monthly in 	EBRD PR3 IFC PS3 National legislation	<ul style="list-style-type: none"> ● Records of site inspections ● Records of noise monitoring undertaken by a third-party ● Training records of workers 	During construction phase	Contractor of ELZ A.Ş.

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	the first 3 months of construction to identify the need for noise barriers. If levels at receptors exceed the standards, continue to conduct the noise monitoring measurements monthly and take measures to reduce noise levels so that the limit values are met. If the results of noise monitoring in the first 3 months of construction are observed to be below limit values, continue conducting measurements quarterly.				
PR 4: Community Health, Safety and Security					
18	<p>Life and fire safety</p> <ul style="list-style-type: none"> • A fire expert should be hired for the fire audit of existing offices and accommodation area and a positive confirmation should be secured from the expert in terms of fire safety. • The third party life and fire safety consultant shall review the life and fire safety design against Turkish legal requirements as well as NFPA, and shall make recommendations if any significant issues are identified • Provide design certification by the above professional acceptable to IFC/EBRD to comply with life and fire safety requirements of IFC/EBRD • Develop a Life and Fire Safety Plan to identify major fire risks, applicable codes, standards and regulations, and mitigation measures. • The same life and fire safety experts who prepared the plan will also undertake a review at the time of life and fire safety systems testing and commissioning and certify that construction of life and fire safety system has been carried out in accordance with the accepted design and master plan. If any significant issues are identified, the consultant shall make corrective recommendations. The consultant shall also ensure that adequate emergency evacuation plan, training plan, regular checking of life and fire safety systems are in place. All provisions for disability access will be in place in compliance with international standards. <p>Before the commissioning of the facilities, the company shall submit a letter certifying that constructions have followed the approved seismic</p>	EBRD PR4 IFC PS4	<ul style="list-style-type: none"> • Confirmation for fire safety of offices and accommodation area • Third party audit report for Life and Fire Safety Plan for Final Design • Test and commissioning results • Post construction life and fire safety certification for Final Design • Letter of certification 	<p>During construction phase</p> <p>During construction phase (at the time of commissioning)</p>	Contractor of ELZ A.Ş.

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	designs and necessary approvals were obtain from the related authorities.				
19	<p>Community Health and Safety</p> <ul style="list-style-type: none"> • Implement Community Health and Safety Management Plan • Implement Construction Camp Management Plan • Implement Construction Traffic Management Plan • Undertake measures for air and noise as identified in the ESMP • Implement Emergency Preparedness and Response Plan (EPRP) and disclose the plan to communities • Update local authorities and communities if there are changes in the EPRP • Undertake regular drills/exercises of emergency measures • Train workers • Document discussion of any identified impacts, risk and mitigation measures with communities during construction and at least annually a year in the scope of Environmental and Social Performance Annual Monitoring Report (AMR) 	<p>EBRD PR4 IFC PS4</p>	<ul style="list-style-type: none"> • Records of audits and regular inspections • Sufficient number of traffic signs • Training records • Evidence of disclosure and updates • Records of drills • Records of meeting with the communities 	During construction phase	Contractor of ELZ A.Ş.
20	<p>Security</p> <ul style="list-style-type: none"> • Implement Security Plan • Hire adequate, trained security staff who have not been involved in past abuses 	<p>EBRD PR4 IFC PS4 Best Practice National legislation</p>	<ul style="list-style-type: none"> • Records of audits and inspections • Records of credentials of security staff • Training records of security staff 	Construction phase	Contractor of ELZ A.Ş.
PR 8: Cultural Heritage					
21	<p>Chance Finds</p> <ul style="list-style-type: none"> • Implement Archaeological Chance Find Management Plan if needed <p>Contact relevant authorities (i.e. Museum Directorate) in case of chance finds</p>	<p>EBRD PR8 IFC PS8</p>	<ul style="list-style-type: none"> • Records of chance finds documentation • Copies of correspondence with authorities 	During construction if needed	Contractor of ELZ A.Ş.
PR 10: Information Disclosure and Stakeholder Engagement					
22	<p>Information Disclosure/ Stakeholder Engagement/ Community Grievances</p> <ul style="list-style-type: none"> • Stakeholder Engagement Plan (SEP) to be updated if there are 	<p>EBRD PR10 IFC PS1</p>	<ul style="list-style-type: none"> • Updated and disclosed SEP and Grievance Mechanism • Grievance log including records of grievances, response to grievances 	During construction phase	Contractor of ELZ A.Ş.

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	significant changes in the Project <ul style="list-style-type: none"> • Publicize SEP and Grievance Mechanism including information on contact details of responsible staff to handle grievances • Implement Grievance Mechanism • Respond to grievances in a timely manner • Undertake necessary corrective actions if needed • Record keeping for all information on consultation and information disclosure activities • Annual reporting to IFC/EBRD on the implementation of the ESMP and any new impacts/risks identified to affected communities in the scope of Environmental and Social Performance Annual Monitoring Report (AMR) ESIA, SEP and ESMP to be disclosed and remain in the public domain for the lifetime of the Project		and corrective actions Grievance <ul style="list-style-type: none"> • Records of information disclosure • Evidence of disclosure and availability of documents (i.e. Project website) • Annual reports (AMR) 		

3. Operation Phase ESAP

Number	Issue/Action	Legal Framework EBRD PR / IFC PS	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
PR1: Environmental and Social Appraisal and Management					
1	<p>ESMS</p> <ul style="list-style-type: none"> • Definition of an ESMS Policy (including environmental, health, safety and social aspects) • Develop and implement an ESMS in line with international good practice and guidelines (i.e. ISO 9001: 2008, ISO 14001: 2004, OHSAS 18001: 2007) • Undertake necessary consultation with MoH during the development of the ESMS • Establish an organizational structure for the implementation of the ESMS in cooperation with MoH to reflect the management structure including roles and responsibilities between the company and MoH, for environment, health and safety, social and human resources during the operation phase, and establish management units. • Appoint a qualified Environmental and Social Manager/Team • Prepare and put in place site specific procedures/plans for operation phase including the following: <ul style="list-style-type: none"> ○ Air Quality Control and Monitoring Plan ○ Waste Management Plan (covers all wastes including solid, medical and hazardous waste) ○ Hazardous Material Management Plan ○ Emergency Preparedness and Response Plan ○ IHC Traffic Management Plan ○ Community Health and Safety Management Plan ○ Exposure Control Plan for blood-borne pathogens ○ Radiation Exposure Control Plan ○ Radioactive Substance Management Plan ○ Life and Fire Safety Plan ○ Security Plan ○ Human Resources Management Plan ○ Occupational Health and Safety Management Plan ○ Subcontractor Management and Monitoring Plan • Provide training for designated staff on environmental and social 	<p>EBRD PR1/PR2 IFC PS1/PS2 World Bank Group (WBG) General and Health Care Facilities EHS Guidelines. Best practice</p>	<ul style="list-style-type: none"> • An approved and announced ESMS Policy • An established and implemented ESMS and relevant documentation (risk assessments, plans, procedures, control forms etc.) • An established organizational structure and defined roles for ESMS • Appoint Environmental and Social Manager/Team • Written and approved site specific environmental and social plans/procedures • ESMS system records (audit records, measurement records, training records etc.) 	<p>Prior to operation phase</p>	<p>Service Provider of ELZ A.Ş. and MoH (as necessary)</p>

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	topics and implementation of the abovementioned site specific plans				
2	<p>ESMS</p> <ul style="list-style-type: none"> • Implementation of ESMS, ESMP and the following plans: <ul style="list-style-type: none"> ○ Air Quality Control and Monitoring Plan ○ Waste Management Plan ○ Hazardous Material Management Plan ○ Emergency Preparedness and Response Plan ○ IHC Traffic Management Plan ○ Community Health and Safety Management Plan ○ Exposure Control Plan for blood-borne pathogens ○ Radiation Exposure Control Plan ○ Radioactive Substance Management Plan ○ Life and Fire Safety Plan ○ Security Plan ○ Human Resources Management Plan ○ Occupational Health and Safety Management Plan ○ Subcontractor Management and Monitoring Plan 	<p>EBRD PR1 IFC PS1 Best practice</p>	<ul style="list-style-type: none"> • Required documentation as per ESMS, ESMP and specific plans (e.g. permits, consents, official correspondence, monitoring results, audit reports and similar) • Training records of personnel/workers/subcontractors 	During operation phase	Service Provider of ELZ A.Ş. and MoH (as necessary)
3	<p>Health Care Waste Management System (HWMS)</p> <ul style="list-style-type: none"> • Establish a HWMS as per IFC Requirements • Undertake necessary consultation with MoH during the developments of the HWMS 	WBG EHS Guidelines for Health Care Facilities	<ul style="list-style-type: none"> • HWMS documentation 	Prior to operation phase	Service Provider of ELZ A.Ş. and MoH (as necessary)
4	<p>Health Care Waste Management System (HWMS)</p> <ul style="list-style-type: none"> • Implementation of the HWMS 	WBG EHS Guidelines for Health Care Facilities	<ul style="list-style-type: none"> • Records of audits and inspections • Records of healthcare waste management, storage, transport and disposal 	During operation phase	Service Provider of ELZ A.Ş. and MoH (as necessary)
5	<p>Permitting</p> <ul style="list-style-type: none"> • Obtain all necessary permits/consents/approvals as needed prior to and during operation phase 	<p>EBRD PR1 IFC PS1 National legislation</p>	<ul style="list-style-type: none"> • Records of permits, official letters, licenses, approvals, documents and similar • Records of testing and audits as per the 	Prior to/during operation phase	Service Provider of ELZ A.Ş. and MoH (as necessary)

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Number	Issue/Action	Legal Framework EBRD PR / IFC PS	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
			requirements of permitting		
6	Hospital Commissioning <ul style="list-style-type: none"> Carry out all relevant commissioning tests 	EBRD PR1 IFC PS1 National legislation	<ul style="list-style-type: none"> Records of relevant commissioning tests 	Prior to operation phase	Contractor of ELZ A.Ş.
7	A third party environmental & social audit at the facilities every three years <ul style="list-style-type: none"> Hire a third party environmental and social specialist acceptable for EBRD/IFC. The specialist will carry out a third party environmental and social audit of the project in accordance with WBG Environmental, Health and Safety Guideline for Health Care Services and EBRD PRs after the commencement of the hospital complex. Remediate gaps in the audit report. 	WBG EHS Guidelines for Health Care Facilities	<ul style="list-style-type: none"> Audit Report (to be submitted to EBRD for review) Remedial measures report 	Within one year of the commencement of the hospital and then every three years	Service Provider of ELZ A.Ş. and MoH (as necessary)
PR 2: Labour and Working Conditions					
8	Human Resources <ul style="list-style-type: none"> Develop a HR Policy in line with IFC PS2/EBRD PR2 and ensure all workers are aware of its content Develop HR Management Plan Develop employee/worker contracts setting out working conditions, terms of employment and EHS responsibilities Insure all employees/workers under Social Security Institution (SSI) Establish procedures to communicate and coordinate among the employees of ELZ A.Ş./Service providers of ELZ A.Ş. and health service employees under the responsibility of MoH. 	EBRD PR2 IFC PS2	<ul style="list-style-type: none"> HR Policy HR Management Plan Employee/Worker contracts SSI Records Procedure for HR coordination 	Prior to operation phase	Service Provider of ELZ A.Ş.
9	Human Resources <ul style="list-style-type: none"> Implement HR Management Plan Issue contracts to employee/workers upon recruitment Keep files of all employees/workers that include their work contracts, training records, medical surveillance records, next of kin contact details and similar 	EBRD PR2 IFC PS2	<ul style="list-style-type: none"> Employee/worker contracts Personnel files Database of employees/workers Short quarterly reports available for review by external monitors. 	During operation phase	Service Provider of ELZ A.Ş.

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Number	Issue/Action	Legal Framework EBRD PR / IFC PS	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	<ul style="list-style-type: none"> Develop a database of employees/workers and subcontractors that includes information on the age, social security number, identity card number, gender, ethnicity, nationality and home town. Payroll checks by O&M contractor against issues such as sub-contractor wage rates, payment of benefits and timely payments. 				
10	Occupational Health and Safety (OHS) <ul style="list-style-type: none"> Develop an OHS Management Plan to identify health and safety risks of each activity during operation followed by identification of the appropriate mitigation measures/personal protective equipment Provide safety and induction training to employees/workers Provide first-aid training to relevant number of workers as required by national legislation 	EBRD PR2 IFC PS2 IFC EHS Guidelines IFC EHS Guidelines for Health Care Facilities National legislation	<ul style="list-style-type: none"> Occupational Health and Safety Plan Training records 	Prior to operation phase	Service Provider of ELZ A.Ş
11	Occupational Health and Safety <ul style="list-style-type: none"> Implementation of OHS Management Plan in line with IFC/EBRD requirements and national legislation Provide necessary trainings to employees/workers Record all accidents and incidents Comply with health and safety legislation applicable to the operation phase of the Project 	EBRD PR2 IFC PS2 IFC EHS Guidelines IFC EHS Guidelines for Health Care Facilities National legislation	<ul style="list-style-type: none"> Occupational Health and Safety Plan Records of audit reports, regular inspections, trainings for employees/workers and similar Accident and incident logs Records of corrective actions 	During operation phase	Service Provider of ELZ A.Ş
12	Employee's/ Worker's grievances <ul style="list-style-type: none"> Develop a Grievance Mechanism for employees/workers and ensure that third party workers have access to the grievance mechanism. 	EBRD PR2 IFC PS2	<ul style="list-style-type: none"> Documented employee/worker grievance mechanism 	Prior to operation phase	Service Provider of ELZ A.Ş
13	Employee's/ Worker's grievances <ul style="list-style-type: none"> Publicize the Grievance Mechanism to personnel/workers Implementation of Grievance Mechanism Respond to grievances in a timely manner Undertake necessary corrective actions if needed 	EBRD PR2 IFC PS2	<ul style="list-style-type: none"> Grievance log including records of grievances, response to grievances and corrective actions 	During operation phase	Service Provider of ELZ A.Ş

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Number	Issue/Action	Legal Framework EBRD PR / IFC PS	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
14	Subcontractors <ul style="list-style-type: none"> • Include clauses in contracts requiring compliance with the Project HR Policy, ESMP, ESAP and other project specific plans • Develop a Subcontractor Management and Monitoring Plan 	EBRD PR1/PR2 IFC PS1/PS2	<ul style="list-style-type: none"> • Subcontractor Management and Monitoring Plan 	Prior to operation phase	Service Provider of ELZ A.Ş
15	Subcontractors <ul style="list-style-type: none"> • Implementation of Subcontractor Management and Monitoring Plan that includes checking of subcontractors to verify they are reputable and legitimate enterprises • Prepare a subcontractor list consented by MoH • Require subcontractors to manage their workers in line with Project's HR policy and adopt grievance mechanism through contract clauses • Require subcontractors to adhere to the Project's OHS policies and plans through contract clauses • Require subcontractors to report accidents, incidents and safety non-compliances through contract clauses 	IFC PS2 EBRD PR2	<ul style="list-style-type: none"> • Contracts with subcontractors • Subcontractor list consented by MoH • Records of subcontractor's accidents, incidents and non-compliances • Subcontractor personnel files • Evidence of how workers are informed about the grievance mechanism • Grievance log 	During operation phase	Service Provider of ELZ A.Ş
16	Supply of materials <ul style="list-style-type: none"> • Supply materials as close as possible to the facility • Prepare an supplier list • Supply materials from licensed/certified/permited suppliers/facilities • Prefer to the extent possible recycled materials and materials certified as "green" and low carbon • Integrate in OHS management plan procedures and mitigation measures to ensure that primary suppliers within the supply chain are taking steps to prevent or to correct life-threatening situations related to supply chain workers, and where remedy is not possible, the Project Company will shift the primary supply chain over time to suppliers that can demonstrate that they are complying with IFC PS2. 	EBRD PR1/PR2 IFC PS1/PS2 Best Practice	<ul style="list-style-type: none"> • Records of supply sources • Supplier List • Licenses/certificates/permits of the suppliers • Procedures and mitigation measures document disclosed to related parties and annual monitoring report records 	During operation phase	Service Provider of ELZ A.Ş
PR 3: Pollution Prevention and Abatement					
17	Pollution Prevention <ul style="list-style-type: none"> • Perform regular periodic integrity testing for hazardous material 	EBRD PR3	<ul style="list-style-type: none"> • Records of periodical site inspections • Presence of spill response kits 	During operation	Service Provider of ELZ A.Ş

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Number	Issue/Action	Legal Framework EBRD PR / IFC PS	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	<p>storage equipment (i.e. underground storage tanks and lines)</p> <ul style="list-style-type: none"> • Adopt good operation practices for the protection of soil, surface water and groundwater (e.g storage areas, spillage control, spill kits etc.) • Keep spill response kits at designated areas with specific instructions for their use and train site staff on the use of spill kits. • Implement following plans: <ul style="list-style-type: none"> ○ Hazardous Material Management Plan ○ Emergency Preparedness and Response Plan ○ Waste Management Plan • Train personnel/workers/subcontractors • Develop EPRP to ensure mitigation of spills from hazardous materials during operation 	<p>IFC PS3 Best practice National legislation</p>	<ul style="list-style-type: none"> • Records of monitoring of the implementation of the relevant plans • Audit and control results, spillage incident records, measurement results, contaminated soil disposal records, training records and similar • Records of regular integrity testing of underground storage tanks and lines 	phase	
18	<p>Hazardous Materials</p> <ul style="list-style-type: none"> • Develop and implement Hazardous Material Management Plan <ul style="list-style-type: none"> ○ Prepare an inventory of hazardous materials ○ Obtain Material Safety Data Sheets (MSDSs) and provide in relevant locations in in both English and Turkish ○ Make Personal Protective Equipment (PPE) available for relevant personnel ○ Train relevant personnel ○ Take required onsite measures ○ Keep hazardous materials at designated areas • Locate suitable fire-fighting equipment close to hazardous material storage/usage areas 	<p>EBRD PR3/PR4 IFC PS3/PS4 Best Practice National legislation</p>	<ul style="list-style-type: none"> • Records of audits • Hazardous material inventory • Site inspections • Incident records • Training records 	Prior to/during operation phase	Service Provider of ELZ A.Ş.
19	<p>Waste Management</p> <ul style="list-style-type: none"> • Develop and implement Waste Management Plan • Maintain and implement the HWMS in line with the waste management practices given in the IFC Guidelines for Health Care Facilities • Manage (collect, transport, dispose etc.) all wastes in line with the legal requirements • Record keeping about waste generation, storage and 	<p>EBRD PR3 IFC PS3 National legislation</p>	<ul style="list-style-type: none"> • Records of audits related to the implementation of the Waste Management Plan • Consents/permits from local authorities for the disposal of wastes • Licenses of transportation companies and disposal facilities • Waste transportation and disposal 	Prior to/during operation phase	Service Provider of ELZ A.Ş

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Number	Issue/Action	Legal Framework EBRD PR / IFC PS	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	<p>transportation to third party waste management facilities</p> <ul style="list-style-type: none"> • Inform TAEK on the radioactive waste generation and identify radioactive waste management options prior to implement any practice with TAEK • Train relevant workers 		<p>records (e.g. National Waste Transportation Form)</p> <ul style="list-style-type: none"> • Declaration records made to the MEUP. • Periodical site inspections to ensure that site conditions/applications are adequate for appropriate waste management • Training records of staff 		
20	<p>Wastewater</p> <ul style="list-style-type: none"> • Discharge domestic wastewater to the municipality infrastructure in line with permits • Provide necessary evidences that the municipality's wastewater treatment facility is capable of handling hazardous wastewater treatment and necessary approval for the discharge of liquid wastes contain radioactivity. • Conduct effluent analysis based on the monitoring frequency and proposed limits provided by the Elazığ Water and Sewage Administration • Separate collection of urine, feces, blood, and vomit from patients treated with geno-toxic drugs to avoid their entry into the wastewater stream • Undertake necessary measures for liquid wastes contaminated with radioactive substances as per the Regulation on Wastes Generated upon Usage of Radioactive Substances (OG date/no: 02.09.2004/25571) related to discharging this type of wastewater into the sewer system • Ensure discharge of chemicals used in the laboratories and the effluents from laboratory equipment does not occur to sewer system and these are transferred to barrels via special collection systems that do not need manpower 	<p>EBRD PR3 IFC PS3 National legislation</p>	<ul style="list-style-type: none"> • Check municipal sewer system connection certificate obtained from the relevant authority • Check effluent analysis results to ensure they met discharge criteria 	<p>During operation phase</p>	<p>Service Provider of ELZ A.Ş.</p>
21	<p>Radioactive substances</p> <ul style="list-style-type: none"> • Manage radioactive substances in accordance with the national law and IFC EHS Guidelines for Health Care Facilities • Develop and implement Radioactive Substance Management Plan 	<p>EBRD PR1/PR3 IFC PS1/PS3 National legislation International</p>	<ul style="list-style-type: none"> • Radioactive Substance Management Plan 	<p>Prior to/during operation phase</p>	<p>Service Provider of ELZ A.Ş.</p>

Number	Issue/Action	Legal Framework EBRD PR / IFC PS	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
		Atomic Energy Agency standards			
22	Air Emissions <ul style="list-style-type: none"> • Implement Air Quality Control and Monitoring Plan • Implement IHC Traffic Management Plan • Monitoring of emissions from trigeneration and boiler systems in line with national regulatory requirements and IFC General EHS Guidelines • Annually quantify direct and indirect GHG emissions 	EBRD PR3/PR4 IFC PS3/PS4 National legislation	<ul style="list-style-type: none"> • Records of audits related to the implementation of the Air Quality Control and Monitoring Plan and IHC Traffic Management • Air quality monitoring results • Annual GHG emissions report 	During Operation Phase	Service Provider of ELZ A.Ş.
23	Environmental accidents/ actions <ul style="list-style-type: none"> • Record keeping on environmental accidents and actions taken 	EBRD PR3 IFC PS3	<ul style="list-style-type: none"> • Environmental accidents and actions log 	During operation phase	Service Provider of ELZ A.Ş.
PR 4: Community Health, Safety and Security					
24	Community Health and Safety <ul style="list-style-type: none"> • Develop a Community Health and Safety Management Plan • Develop Emergency Preparedness and Response Plan • Develop IHC Traffic Management Plan • Develop a Security Plan including security plans for High Security Forensic Psychiatric Hospital in collaboration with MoH and Gendarmerie 	EBRD PR4 IFC PS4	<ul style="list-style-type: none"> • Community Health and Safety Management Plan • Emergency Preparedness and Response Plan • IHC Traffic Management Plan • Security Plan • Initiate discussion with MoH and Gendarmerie as how to address security issues 	Prior to operation	Service Provider of ELZ A.Ş.
25	Community Health and Safety <ul style="list-style-type: none"> • Implement Community Health and Safety Management Plan • Implement IHC Traffic Management Plan • Implement Emergency Preparedness and Response Plan and disclose the plan to communities • Update local authorities and communities if there are changes in the EPRP • Undertake regular drills/exercises of emergency measures • Train workers/employees • Document discussion of any identified impacts, risk and 	EBRD PR4 IFC PS4	<ul style="list-style-type: none"> • Records of audits and regular inspections • Training records • Evidence of disclosure and updates • Records of drills • Records of meeting with the communities 	During operation phase	Service Provider of ELZ A.Ş.

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Number	Issue/Action	Legal Framework EBRD PR / IFC PS	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	mitigation measures with communities during operation and at least annually a year in the scope of Environmental and Social Performance Annual Monitoring Report (AMR)				
26	<p>Security</p> <ul style="list-style-type: none"> Develop and implement a Security Plan including Security Policy Hire adequate, trained security staff who have not been involved in past abuses Undertake necessary consultation with MoH and Gendarmerie related to security of High Security Forensic Hospital and security of the patient wards inside the Main Hospital 	<p>EBRD PR4 IFC PS4</p>	<ul style="list-style-type: none"> Security Plan including Security Policy Records of credentials of security staff Training records of security staff Copies of correspondence between ELZ A.Ş./Service Provider of ELZ A.Ş and MoH/Gendarmerie 	Prior to/during operation phase	Service Provider of ELZ A.Ş.
27	<p>Life and fire safety</p> <ul style="list-style-type: none"> Implementation of Life and Fire Safety Plan including operation of the IHC in full compliance with the Turkish Regulations on the Protection of Buildings from Fire and fulfilling of the deficiencies of the local regulations by the implementation of the internationally accepted standards Maintenance of all fire safety systems in proper working order, including self-closing doors in escape routes and ventilation ducts with fire safety flaps 	<p>EBRD PR4 IFC PS4</p>	<ul style="list-style-type: none"> Records for the implementation of the Life and Fire Safety Plan 	During operation phase	Service Provider of ELZ A.Ş.
28	<p>Infectious Disease Control</p> <ul style="list-style-type: none"> Develop and implement Exposure Control Plan for blood-borne pathogens and inform employees/workers/visitors on infection control policies Establish an Infection Control Committee Set up a central log on system of infection related incident and accidents with management oversight 	<p>EBRD PR4/PR2 IFC PS4/PS2</p>	<ul style="list-style-type: none"> Records of audits for the implementation of the plans and policies for infection control Immunization records 	During operation phase	<p>Service Provider of ELZ A.Ş</p> <p>MoH</p>
PR 5: Land Acquisition, Involuntary Resettlement and Economic Displacement					
29	<p>Potential Closure of Hospitals</p> <p>If any existing hospital and/or hospital ward will be closed as a result of the project, Service provider of ELZ A.S. will provide equal employment opportunities to non-MoH staff working in the affected hospitals (the MoH has its own relocation policy for its own</p>	<p>EBRD PR5 IFC PS5</p>	<ul style="list-style-type: none"> Employee contracts, if any of non-MoH staff of affected hospital(s) is recruited 	Prior to/during operation phase	Service Provider of ELZ A.Ş.

Number	Issue/Action	Legal Framework EBRD PR / IFC PS	Deliverable / Completion Indicator	Deadline	Implementation Responsibility
	employees).				
PR 10: Information Disclosure and Stakeholder Engagement					
30	Information Disclosure/ Stakeholder Engagement/ Community Grievances <ul style="list-style-type: none"> • SEP to be updated when the Project moves into the operation phase • Publicize SEP and Grievance Mechanism including information on contact details of responsible staff to handle grievances 	EBRD PR10 IFC PS1	<ul style="list-style-type: none"> • Updated and disclosed SEP and Grievance Mechanism 	Prior to operation phase	Service Provider of ELZ A.Ş.
31	Information Disclosure/ Stakeholder Engagement/ Community Grievances <ul style="list-style-type: none"> • Implement Grievance Mechanism • Respond to grievances in a timely manner • Undertake necessary corrective actions if needed • Document records of consultation and information disclosure • Annual reporting to IFC/EBRD on the implementation of the ESMP and any new impacts/risks identified to affected communities in the scope of Environmental and Social Performance Annual Monitoring Report (AMR) 	EBRD PR10 IFC PS1	<ul style="list-style-type: none"> • Grievance log including records of grievances, response to grievances and corrective actions • Grievance • Consultation activity log • Minutes of meetings • Annual reports (AMR) 	During operation phase	Service Provider of ELZ A.Ş.
32	Patient's grievances <ul style="list-style-type: none"> • Implement Patient's Grievance Mechanism for health services that are under the responsibility of MoH • Implement Patient's Grievance Mechanism for hospital services that are under the responsibility of the service provider of ELZ A.Ş. 	EBRD PR10 IFC PS1	<ul style="list-style-type: none"> • Patient's Grievance Mechanism 	During operation phase	MoH Service Provider of ELZ A.Ş.