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SUSTAINABLE CITIES PROJECT-II ADDITIONAL FINANCING

ODUNPAZARI REHABILITATION CENTER FOR AUTISTIC AND DISABLED PEOPLE PROJECT

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

SÜRDÜRÜLEBİLİR ŞEHİRLER
TÜRKİYE CUMHURİYETİ ÇEVRE, ŞEHİRCİLİK VE İKLİM DEĞİŞİKLİĞİ BAKANLIĞI
İLBANK TÜRKİYE'NİN YAPICI GÜCÜ
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ODUNPAZARI REHABILITATION CENTER FOR AUTISTIC AND DISABLED PEOPLE PROJECT

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

Version	Revision	Date	Prepared by	Prepared by	Prepared by	Quality Management by	Controlled by	Approved by
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TABLE OF CONTENT

Page

This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliği, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklaşa finanse edilmektedir

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Bu Proje Avrupa Birliği, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklaşa finanse edilmektedir

LIST OF TABLES

Page

LIST OF FIGURES

Page

LIST OF ABBREVIATIONS

AoI	Area of influence
ASD	Autism Spectrum Disorder
CİMER	Presidential Communication Center
EAF	EIA Application File
EBRD	European Bank for Reconstruction and Development
EHS	Environmental, Health and Safety
EIA	Environmental Impact Assessment
EPRP	Emergency Preparedness and Response Plan
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESMR	Environmental and Social Monitoring Reports
FI	Financial Intermediary
HP	Horsepower
HRS	Human Resources Specialist
IB	ILBANK
ICEM	Education and Research Center for Hearing Impaired Children
IFC	International Finance Corporation
ILO	International Labor Organization
IUCN	International Union for Conservation of Nature and Natural Resources
KPI	Key Performance Indicators
MoEUCC	Ministry of Environment, Urbanization and Climate Change
NCR	Non-Conformance Report
NGO	Non-Governmental Organizations
OHS	Occupational Health and Safety
OP	Operational Policies
PIF	Project Introduction File
PPE	Personal Protective Equipment
PPM	Public Participation Meeting
RAP	Resettlement Action Plan
SCP	Sustainable Cities Project
SEP	Stakeholder Engagement Plan
TAP	Portable Battery Manufacturers and Importers Association

TURKSTAT	Turkish Statistical Institute
WB	World Bank
WBG	World Bank Group
WHO	World Health Organization
YİMER	Foreigners Communication Center

EXECUTIVE SUMMARY

The Project Owner is Odunpazarı Municipality, which serves 85 neighborhoods (Eskişehir Odunpazarı Municipality, 2021). The project is designed to provide residential rehabilitation and day care home services for people with disabilities living in the city. The service capacity of the Project has been determined as 40 people. The Project is designed for the rehabilitation process of disabled individuals and their families includes workshops, health support services, personal self-care and psycho-social support services, as well as inpatient and day care. With the start of the project, priority will be given to individuals with a Special Needs Report, and services will be provided to disabled individuals aged 12 and over living in Eskişehir. It is anticipated that the project will serve the public for 50 years.

With the project going into operation, families will have the opportunity to leave disabled people for a day and/or boarding, and the boarding period is planned to be a maximum of one week. In addition to accommodation services, it is planned to provide free workshop services within the Project area.

The project area has been the property of the municipality for over 20 years; therefore, no land acquisition is required as part of the Project.

The activities under this Project are not included in Annex-1 and Annex-2 according to the Turkish EIA legislation, and therefore the Project is considered as out of scope.

As per WB O.P. 4.01, projects are classified in categories A, B or C depending on the severity of their potential impacts on the environment. The Project is specified as Category B project which resulting environmental and/or social impacts that are specific to the location of the facility and/or with impacts that could be easily identified and prevented.

The critical and natural habitats are examined within the scope of the World Bank's Operational Policy (OP) 4.04 on natural habitats and there is no critical and natural habitat in the vicinity of the project area. The potential impacts and mitigation measures for these are prepared by carrying out literature and surface studies as a requirement of the World Bank's Operational Policy OP 4.11 on Psychical Cultural Resources.

Except for this ESMP, plans such as Stakeholder Engagement Plan (SEP) and Project Identification Document (PID) are prepared for the Project.

1 INTRODUCTION

This plan presents the Environmental and Social Management Plan (ESMP) for '*Odunpazarı Municipality Rehabilitation Centre for Autistic and Disabled People Project'* (hereinafter referred to as 'Project') and is prepared by 2U1K Mühendislik ve Danışmanlık A.Ş. for *"Odunpazarı Municipality"* (hereinafter referred to as 'Project Owner').

The Project will be established to serve the individuals with disabilities and autism in Eskişehir Province and will be built at Odunpazarı District, Çankaya Neighborhood, Şahin Tepesi Locality. The Project is designed to provide in-patient rehabilitation center and day care house services to the disabled residing in Eskişehir Province. The designed Project encompasses the rehabilitation of the disabled and their families and in-patient and day care as well as workshops, health support services, personal self-care and psycho-social support services.

A loan application was lodged to ILBANK[1] to implement the project. The World Bank, acting as the project financer, authorized ILBANK as the project coordinator. Subsequent to the tender process held by ILBANK, 2U1K Mühendislik ve Danışmanlık A.Ş. (2U1K) was commissioned for the preparation of plans for this Project, namely Environmental and Social Management Plan (ESMP) and Stakeholder Engagement Plan (SEP), which will be run as part of the Sustainable Cities Project-II (SCP-II) Additional Financing (AF), in accordance with the Turkish Environmental Regulations and the World Bank's (as the primary financier) Safeguard Policies.

The purpose of this ESMP prepared by 2U1K is to provide a practical plan to prevent, minimize and/or manage the potential environmental and social negative impacts associated with the activities under the Project, as well as to allow for meaningful and inclusive multi-stakeholder consultations and engagement throughout the lifecycle of the program. At the preparation of this ESMP, the Environmental and Social Management Framework for the entire SCP-II Additional Financing[2] program, the final version of which was published in April 2019, was also considered.

1.1 Purpose of Environmental and Social Management Plan

The ESMP document aims to determine the social and environmental impacts that are likely to occur during the construction and operation phases of the Project, to evaluate these impacts, and to take actions to mitigate and/or prevent negative impacts.

[1]ILBANK and the World Bank (WB) designed the Sustainable Cities Project (SCP) to create a support mechanism for the participating second-tier metropolitan municipalities to plan and invest in a sustainable future. In support of this objective, the Sustainable Cities Project will establish a support system to allow the municipalities of the developing cities to identify and finance and make preparations for financially sound investments and to enhance their urban planning capacities. Investments through the project will comply with both the Turkish environmental regulations and the World Bank's Safeguarding Policies.

[2] https://ewsdata.rightsindevelopment.org/files/documents/12/WB-P170612_7nHpF6X.pdf

Within the scope of the ESMP, information was provided regarding the work items planned to be fulfilled in the contract packages, the methodologies to be applied and the working areas, determining the social and environmental impacts that are likely to occur during both construction and operation phases. Potential impacts occurring during all phases of contract packages were described, and measures were taken to prevent impacts and/or minimize negative impacts. To prevent and minimize the impacts described in this ESMP, the responsible project stakeholders were identified, and it was intended to monitor and control the impacts determined in ESMP during the implementation of the Project.

The adjustments and measures adopted on site and the cases encountered will be submitted to the Project Owner– the municipality in a monthly Environmental and Social Monitoring Report (ESMR) by the contractor during the construction phase. These ESMRs will be reviewed by the Project Owner, considering the works carried out on site, and will be submitted to the Contracting Authority (ILBANK) quarterly. Subsequently, ILBANK will perform its own supervision and monitoring along with the information obtained from the Project Owner through its supervision consultant E&S team's reports. After that ILBANK will compile these ESMRs and submit them to the World Bank (WB) biannually together with Project Progress Reports. During the operation phase, the social and environmental impacts, if any, will be evaluated and presented to the WB and ILBANK biannually.

In addition, the final version of this ESMP approved by ILBANK and the WB will be shared with the local community at a public consultation meeting, followed by the conclusion of inputs/feedback from all stakeholders. For this reason, ESMP and SEP should be updated and then finalized, if consultations result in changes/updates to any documents.

1.2 Review of ESMP

ESMP will be periodically reviewed to address changes in the responsible parties' organization, process, or regulatory requirements.

The Project Management Unit, which will be formed by the Project Owner and detailed in Figure 2-5, will be responsible for the implementation of this ESMP and SEP. ILBANK International Relations Department Project Management Unit will continue to have existing environmental experts, OHS expert/specialist and social experts to be responsible for coordinating the implementation of the Environmental and Social Framework. Environmental experts, OHS expert/specialist and social experts will supervise the Project Owner on WB safeguard requirements, provide consultancy for the implementation of the Environmental and Social Management Plan (ESMP), and monitor the implementation of ESMP and SEP together with the opinion and grievance redress mechanism for affected groups.

Following any reviews, the Project Owner will provide coordination through the Project Management Unit to make any necessary amendments to the ESMP, with the updates communicated to all responsible parties and employees involved in the Project.

1.3 Training

The Project Owner will implement a training and awareness program covering ESMP expectations and commitments, which covers project related environmental and social impacts and risks, and corresponding measures applied to avoid, reduce and mitigate the risks and potential adverse impacts. 2U1K will organize, together with the Project Owner, a workshop for this training in accordance with the scope of work in its current contract. As a minimum requirement, this program will be implemented as training for employees and contractor responsible for the implementation of ESMP. The trainings will be given to the employees and the contractor by the Project Owner before the construction process starts. The trainings will last at most two days and will be organized twice a year. Depending on the ESMRs, which represent level of the success of ESMP implementation, further training programs may need to be performed in order to achieve required target, if the ESMP implementation not at desired level or failed. The necessary training will be provided to the personnel before recruitment, and grading and evaluation should be carried out at the end of the training provided. Supervision consultant will check the relevance of the training program and the training evaluation. According to the results of the evaluation, the training program can be modified or trainers can be replaced or training can be repeated, if needed, upon determining whether the training is effective. This is intended to enhance the personnel's competency.

The training program/modules will address a range of issues, including but not limited to:

- Purpose of ESMP regarding the project activities,
- Requirements in management plans, and monitoring activities to be performed within the scope of this plan,
- Understanding of the sensitive environmental and social receptors within the project area and its vicinity,
- Awareness raising about the potential risk and impacts from the project activities,
- Grievance redress mechanism developed within the scope of the project, process, procedures and service standards, grievance redress mechanism contact channels and employee rights,
- Occupational health and safety, first aid, emergency preparedness,
- COVID-19 related precautions and protection measures,
- Code of conduct and dress code,
- Communication with the local community,
- Code of conduct training, including gender-based violence, sexual harassment, sexual exploitation and abuse,
- Traffic and road safety principles, and

- Training aiming at the sorting, storage and environmental planning of waste.

The Project Owner will ensure that all personnel responsible for the implementation of this ESMP are competent in terms of education, training and experience. All personnel will be provided with environmental and social training appropriate to their scope of activity and level of responsibility.

2 PROJECT DESCRIPTION

The Project is designed to provide residential rehabilitation and day care home services for people with disabilities and autism living in Eskişehir Province. The rehabilitation center will be built at Odunpazarı District, Çankaya Neighborhood, Şahin Tepesi Locality and the Project Owner is Odunpazarı Municipality.

As per WB O.P. 4.01, projects are classified in categories A, B or C depending on the severity of their potential impacts on the environment. The Project is specified as Category B project projects, with environmental and/or social impacts that are specific to the location and/or with impacts that could be easily identified and prevented. Accordingly, an Environmental and Social Management Plan (ESMP) and Stakeholder Engagement Plan (SEP) were prepared for the Project in order to avoid, reduce and mitigate the environmental and social impacts of the Project and to plan the participation of the project stakeholders in the process. Except for ESMP and SEP, Project Identification Document (PID) is prepared for the Project.

Moreover, according to the Turkish EIA Regulation, this project is considered as out of scope and exclusion letter from the Provincial Directorate of Environment, Urbanization and Climate Change for this Project is presented in Appendix-B. The area where the Project will be carried out belongs to the Project Owner and there is no need for land acquisition within the scope of the Project.

Project area will be on 1,898.63 m² of land in Çankaya Neighborhood, Şahin Tepesi Locality, parcel no. 24806, block no. 1. The Area of Influence (AoI) is taken as the project area and its vicinity (i.e. 200 m). In particular, the project's environmental impacts are limited to the footprint and these impacts are effective for limited time during construction phase. The project area has been examined and no historical and culturally important assets or finds have been found within the area of influence (AoI). There is no need for material borrow pit/quarry for the Project. Since the construction works for the Project will be carried out in a neighborhood close to the city center, it is foreseen that no accommodation will be established for the employees at the project site. However, containers can be placed on the project site for those who will work on the project to rest, eat and also for sanitary facilities. These containers will meet standards for worker accommodation prepared by International Finance Corporation (IFC) and European Bank for Reconstruction and Development (EBRD) and approved by the WB[3].

It is expected to implement the tender in the period between February 2023 and June 2023, construction period between July 2023 and April 2025. It is anticipated that the project will serve the public for 50 years.

[3] https://documents1.worldbank.org/curated/en/604561468170043490/pdf/602530WP0worke10Box358316B01PUBLIC1.pdf

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2.1 Project Location

The Project is located in Eskişehir Province, Odunpazarı District, Çankaya Neighborhood, Şahin Tepesi Locality. A total of 85 settlements, each of which is a neighborhood, exist in Odunpazarı District and these neighborhoods are within the scope of the Project.

Odunpazarı District is located on the western boundary of Eskişehir Province, and is surrounded by Alpu District in the east, Seyitgazi District in the south, Mahmudiye District in the southeast and Tepebaşı District in the west. The project site location map is given in Figure **2-1** below.

Figure 2-1. Project Site Location Map

The project area has been the property of the municipality for over 20 years (see Appendix-A); therefore, no land acquisition is required for the Project. Similarly, the Project will not cause any physical and/or economic displacement.

Based on the environmental, social, and community health and safety impacts that will occur during the construction phase of the Project, the Project's AoI has been determined as 200 m based on expert opinion, and in this context, Çankaya and Erenköy neighborhoods are both settlements within Area of Influence (AoI), while during the operation phase, the Project will serve the entire city. The project location is presented in Figure 2-2.

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Figure 2-2. Project Location and Area of Influence

2.2 Purpose of the Project

The Project will be implemented to serve the individuals with disabilities and autism. According to the World Health Organization (WHO), the definition of the disabled refers to any person with any loss or abnormality of psychological, physiological, or anatomical structure or function; restriction or lack (resulting from an impairment) of ability to perform an activity in the manner or within the range considered normal for a human being; and disadvantage for a given individual, resulting from an impairment or disability, that limits or prevents the fulfilment of a role that is normal (depending on age, sex and social and cultural factors) for that individual (World Disability Foundation, 2014).

To define the Autism Spectrum Disorder (ASD), also known as autism, the term "autistic person" is used in the Regulation on Special Educational Services that became effective by publishing in the Official Gazette dated 07.07.2018 and numbered 30471 and the autistic person is defined as any person whose limitations in social interaction, verbal and non-verbal communication, interests and activities occur in early childhood and who need special education and support education services due to these traits (Ministry of Family, Labour and Social Services of the Republic of Turkey, 2016).

The Project is designed to provide in-patient rehabilitation center and day care house services to the disabled residing in Eskişehir Province. The project service capacity is stated as 40 people. The designed Project encompasses the rehabilitation of the disabled and their families and in-patient and day care as well as workshops, health support services, personal self-care and psycho-social support services. With the commissioning of rehabilitation center, priority will be given to the individuals with a Special Needs Report, and the disabled residing in Eskişehir, who is aged 12 years old and above, will be provided with services.

Families will have the means to leave the disabled family members for a day and/or on an in-patient basis, and the in-patient care period is planned to be a maximum of one week. Within the scope of the project, it is being planned to render the workshop services free of charge and the services, such as accommodation, healthcare and heating, will be charged at the minimum rate to be set by the Project owner.

2.3 Project Demand Analysis and Objectives

Based on the results of the Population and Housing Research, the ratio of the population of the citizens with at least one condition of disability (aged 3 years old and above) to Turkey's population is 6.9% (4,876,000 individuals). Considering the distribution by gender, this ratio is 5.9% among males and 7.9% among females (Ministry of Family, Labour and Social Services of the Republic of Turkey, 2021).

As compared to the last year, the population increase of Odunpazarı District was declared as 0.43%, and the population increase graph is presented in Figure 2-3 (TURKSTAT, 2020).

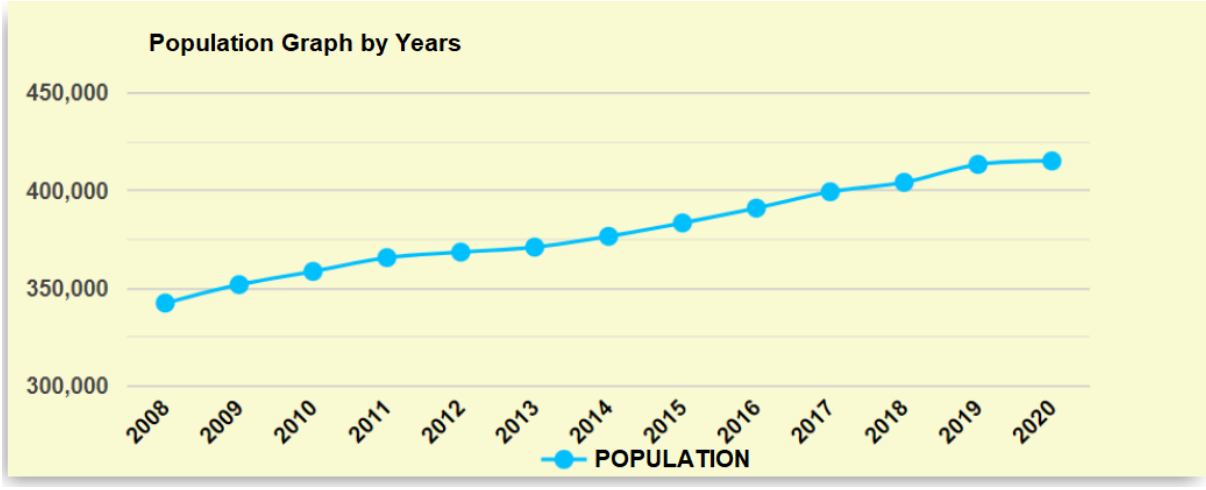

Figure 2-3. Odunpazarı Municipality Population Graph by Years (TURKSTAT, 2020)

On July 26, 2021, 2U1K Environmental and Social Experts conducted a site visit to see the project site and to gather detailed information about the project. According to the information during the site visit provided by Deputy Mayor of Odunpazarı Municipality, Eskişehir Province is highly preferred by disabled individuals and their families since there are many practices for disabled people and there are many NGOs that play an active role in the city. The objective of the Project is to gradually improve the environmental, financial / economic and social sustainability of the Project Owner and to meet the needs of disabled and their families, which are increasing with the population. The implementation of the project is important for the individuals with special needs to adapt themselves to an independent life and to participate in social life.

2.4 Structure and Organizational Chart of the Project Owner

The Project is executed by Deputy Mayor (financial operations), Deputy Mayor (technical operations), Survey and Project Director, Architect, Civil Works Director, and Women and Family Services Director under the coordination of the Mayor of Odunpazarı. The Project's organizational chart is presented in Figure 2-4.

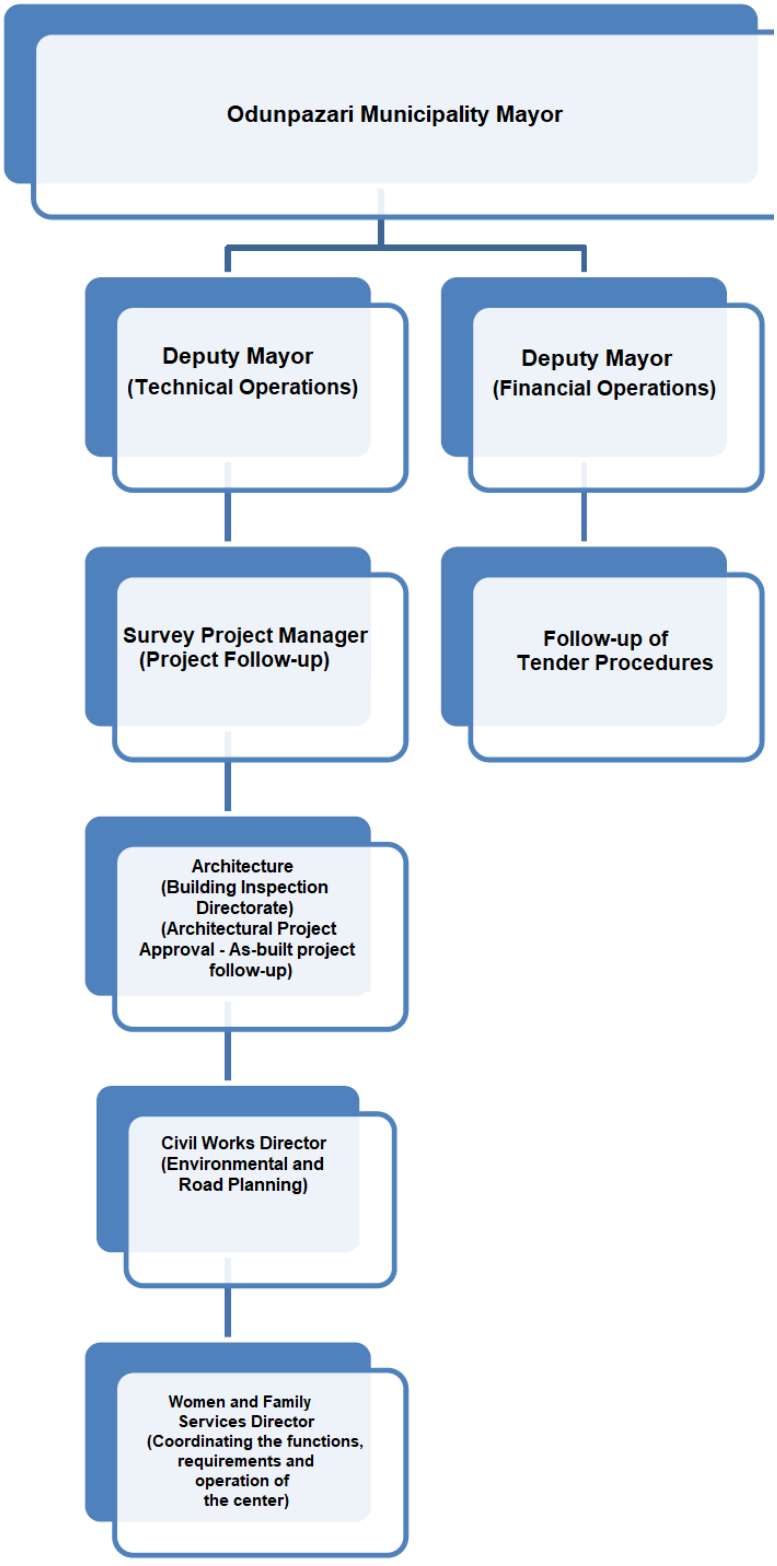

Figure 2-4. Organizational Chart of Odunpazarı Rehabilitation Centre for Autistic and Disabled People Project

The Project Owner, in collaboration with relevant third parties, will establish, maintain and promote, as required, a project-specific organizational structure that defines roles, responsibilities and authority for the implementation of ESMP and SEP as provided as a model in Figure 2-5. Specific personnel with clear boundaries of responsibility and authority should be appointed, including management representatives. The project-specific organizational structure to be developed will include executives, who will coordinate and manage the Project, the technical and financial experts, who will be in charge of construction and operation phases of the Project, and at least one social expert, one environmental expert and one occupational health and safety (OHS) expert. Core environmental and social responsibilities should be well defined and communicated to the relevant personnel and the rest of the Project Management Unit. Additionally, personnel should have adequate knowledge, skills and experience to competently and efficiently take specific measures and actions required under ESMP.

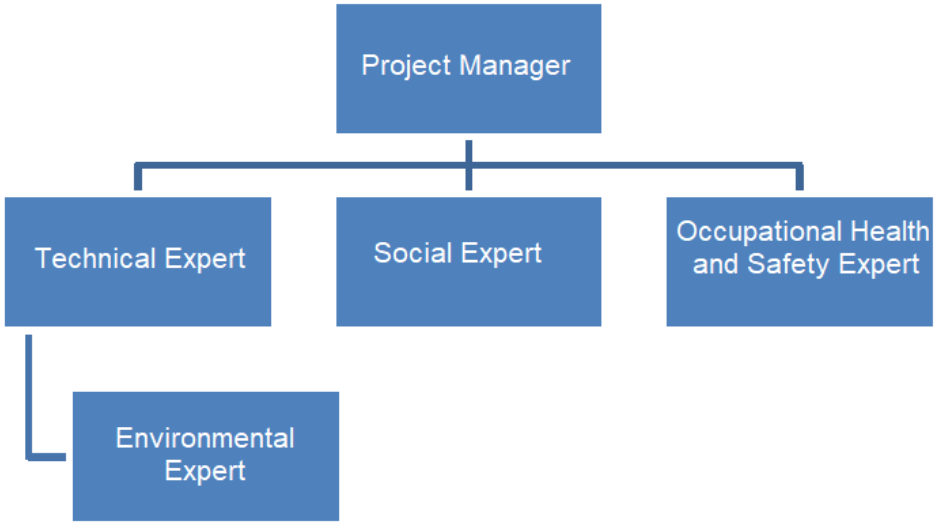

Figure 2-5. Organizational Chart of Project Management Unit

2.4.1 Project Organizational Management

The project will be awarded to a contractor by the tender, which will be lodged by the Project Owner and supervised by ILBANK.

The Supervisory Consultant, who will be responsible for detecting nonconformities, notifying the Project Owner and monitoring corrective actions within the scope of the Project, will be selected by the tender to be opened by the Project Owner. This tender will be held in accordance with the WB Procurement Regulations and companies that have been banned from public tenders will not be included in the tender process. The result of the tender will be approved by ILBANK.

Any non-conformities found during the inspections will be governed by a process adapted to the severity of the case. Non-conformities will be defined as any deviations from the contractual requirements of ESMP documentation. Non-conformities are divided into 4 categories as follows:

Notice of observation regarding minor non-conformities: Notification of the non-conformity to the Contractor's Representative will be followed by a signed notice of observation prepared by the Supervisory Consultant. Reproducing notices of observation or the absence of corrective actions may cause the severity of the non-conformity to be escalated to Level 1.

Level 1 non-conformities: These are the non-conformities that do not pose a major immediate risk to health, environment, society or safety. The non-conformity will be covered by a report addressed to the contractor for remediation within 5 days. The contractor will deliver a report to the Supervisory Consultant describing how the non-conformity was remediated. In addition to the examination and positive evaluation of the effectiveness of the corrective action, the Supervisory Consultant will sign a closure report for the non-conformity. In all cases where Level 1 non-conformity is not remediated within one (1) month, the severity of the non-conformity will be escalated to Level 2.

Level 2 non-conformities: These apply to all non-conformities representing a risk with substantial consequences for health and/or environment, society or safety. The same procedure governing Level 1 non-conformities is applied. The corrective action will be taken by the contractor within 3 days. The contractor will address a report describing the corrective actions taken. All Level 2 non-conformities remaining unresolved within 1 month are escalated to Level 3.

Level 3 non-conformities: These apply to all non-conformities that cause harm to health or the environment or pose a high safety hazard or high social risk. The contractor and the highest levels of the Project Management Unit to be formed within the scope of the Project will be notified immediately and the contractor will be allowed 24 hours to take the incident under control. Level 3 non-conformity leads to a progressive reduction of interim payments until the non-conformity is remediated. Upon remediation of Level 3 non-conformity, the discount(s) will be included in the next Interim Payment Certificate for payment. No interest will be paid on any discounts or suspended payment amounts. As the case may require, the Supervisory Consultant may decide to cease work until the non-conformity is remediated.

Project's organizational management is presented in Table 2-1.

Table 2-1. Project Organizational Management

Responsible Party	Terms of Reference
Project Owner	• The Project Owner (Odunpazarı Municipality) is the implementer and beneficiary of this Project. • The Project Owner will be responsible for providing technical and data support during the supervision of contractor and the preparation of technical and financial feasibility reports regarding projects. • The Project Owner will be responsible for preparing the bid documents during the implementation, conducting bidding processes in accordance with the statute of the Public Procurement Authority, and the legal requirements of the WB will be followed, the following the Construction Contract and cooperating with ILBANK for the supervision of construction activities. • The Project Owner will check both the technical and administrative progress of contract packages and the implementation of the points provided in ESMP and SEP on site together with Environmental, Social and OHS Experts (at least one Social Expert, Environmental Expert and OHS Expert) who will be involved in the Project Organization Chart. • In addition to on-site inspections, the Project Owner will review the Environmental and Social Monitoring Reports (ESMRs) to be submitted by contractor on a monthly basis, and these ESMRs will be submitted to ILBANK as quarterly after being reviewed. ILBANK will compile these ESMRs and submit to WB every 6 months.
Supervisory Consultant	The Project Owner will appoint a Supervisory Consultant having a range of specialties to inspect the contractor's activities on a daily basis. Apart from the guidance to the given to the Project Owner about WB OPs and also the public participation and announcement requirements and the project documents in compliance with WB requirements, the Supervisory Consultant will appoint the personnel given below: • The **Supervisory Contract Manager** will be responsible for inspecting the contractor to ensure that the recommendations and requirements given in the ESMP. They will be responsible for continuously monitoring processes and actions undertaken by the contractor and for identifying the measures to be taken by the contractor to deal with any areas of non-conformity. This includes periodic audits, inspections and/or on-site checks of project areas or worksites and/or records and reports compiled by contractors. • The **Environmental Expert** will be responsible for supervising the implementation of all environmental and biodiversity measures provided in the ESMP and for reporting to the Project Owner regularly. The Environmental Expert is expected to be a graduate of a university or similar institution in relevant disciplines (a master's degree would be an asset) and to be fluent in English and Turkish (both written and spoken). • The **Occupational Health and Safety (OHS) Expert** will be responsible for supervising the health and safety measures throughout the project activities. OHS Expert should be certified for recognized international safety competency, for example, the National General Certificate of OHS or equivalent. Graduation from a university or a similar institution in the relevant discipline would be an asset. • The **Social/Human Resources Expert** will be responsible for supervising the implementation of community health and safety and social measures provided in the ESMP as well as the implementation of SEP, and for reporting to the Project Owner regularly. The expert is expected to be a graduate of a university or similar institution in relevant disciplines (a master's degree would be an asset) and to be fluent in English and Turkish (both written and spoken). The expert is responsible for regularly reporting to the Project Owner.

Responsible Party	Terms of Reference
Contractor	• The construction works under the contract packages included in the scope of the ESMP will be carried out by contractors. • Contractors will be responsible for observing the liabilities provided in the ESMP. Issues related to the implementation of the ESMP will be examined by the contractor during the preparation of the bid, and proposals will be submitted considering the ESMP prepared by the Contracting Authority. • The ESMP includes the monitoring tables that describe the possible negative effects of the operations to be carried out during the construction phase of the project and the measures to be taken to minimize these effects and the conditions for putting these measures into action. Additionally, the said tables include the entities and organizations (project stakeholders) responsible for the aforementioned items. • During the construction phase, the contractor will provide training to the personnel who will take part in the project, including the measures within the scope of ESMP, to raise awareness of environmental, occupational and worker health and safety, community health and safety and social issues. • As part of ESMP, implementation of the measures identified for the construction phase will be coordinated by Environmental, Social and OHS Experts (at least one Social Expert, Environmental Expert and full-time OHS Expert) who will be involved in the Project Organizational Chart. The said experts will be responsible for taking actions required to eliminate/minimize environmental and social impacts in line with ESMP and for putting monitoring plans into practice. • In case of contingencies such as environmental, social and labor issues or accident or loss of time, the contractor will immediately inform the Project Owner and the Project Owner will inform ILBANK and the WB within three working days. A report on the root causes of the incident and the corrective actions to be taken will be submitted to ILBANK and the WB within 30 days.
World Bank and ILBANK	• During the construction and operation phases, the officials from ILBANK and the WB will audit the Project Owner's performance regarding compliance with the provisions set out in the ESMP managed by the Project Owner. • In this respect, contractor will submit their monthly ESMRs to the Project Owner, and the Project Owner will present ESMRs to ILBANK quarterly. • Regarding the works and reporting activities, ILBANK International Relations Department will be informed through the monitoring reports prepared by the Project Owner. • ILBANK, on the other hand, will inform the WB with environmental and social monitoring reports every 6 months. In addition to this information, the WB will audit the project activities and progress through on-site inspections that will be conducted by the WB periodically. • ILBANK will guide public participation and announcement requirements, project documents in compliance with the WB requirements. • ILBANK will guide the Project Owner about WB OPs.

Source: ILBANK Sustainable Cities Project - II Additional Financing Environmental and Social Management Framework

2.5 Labor and Working Requirements

The Project Owner is not within the scope of the Annex-1 or Annex-2 of the Environmental Permit and License Regulation that became effective by publishing in the Official Gazette dated 10.09.2014 and numbered 29115 and is not classified as a business subject to environmental permit.

The Project Owner has not yet executed a contract with a Contractor for the construction phase, and any Contractors to be involved in the construction phase of the Project must act in accordance with the commitments and standards provided within the scope of ESMP.

Since the construction works for the Project will be carried out in the Odunpazarı District center, it is foreseen by the Project Owner that no accommodation will be built for the employees within the scope of the Project. However, containers can be placed on the project site for those who will work on the project to rest, eat and also for sanitary facilities. These containers will meet standards for worker accommodation prepared by IFC and EBRD and approved by the WB[4].

The Contractors are obliged to give code of conduct training to each worker so that the presence of workers who will work during the construction do not result in any disturbance/conflict within the local communities and their interaction with community members do not result in inappropriate behaviors/misconducts. The Project Owner will ensure that the Contractors develop a Code of Conduct and that all workers are informed and received training about it before starting to work. Code of Conduct will be part of the employment contract to be signed by all workers at the job start-up phase. The training given on the Code of Conduct will be controlled and reported by Environmental and Social Experts during each 6-month monitoring period.

2.5.1 Construction Phase

The Project will provide temporary employment opportunities during the construction phase. A definite construction plan has not yet been developed by the Project Owner, and it is anticipated that 10 workers will be working at the same time and 25-30 workers will work at different stages of the construction. The corresponding details will be updated together with the determination of the construction plan of the Project Owner.

[4] https://documents1.worldbank.org/curated/en/604561468170043490/pdf/602530WP0worke10Box358316B01PUBLIC1.pdf

2.5.2 Operation Phase

Once the Project is implemented, trainers and healthcare personnel to be recruited to support the disabled and their families will be selected among the municipality employees. Personnel units to be recruited are listed below.

- Physician
- Nurses
- Medical technicians
- Physiotherapy technicians
- Physiotherapists
- Care Personnel
- Emergency medical technicians
- Health officers
- Social workers
- Psychologists
- Child development experts
- Special education providers

The details regarding the number of personnel to be recruited is not yet informed by the Project Owner but anticipated as 12 people. It will be updated once the details are determined.

3 LEGAL FRAMEWORK

This section outlines the regulatory framework for construction and operation phase the Project in line with national and international requirements which given below.

3.1 National Legal Framework

The Environmental Law, which was published in the Official Gazette No. 18132 and dated 11 August 1983 and amended in the Official Gazette dated 29 Mays 2013 (by Law No. 6486), establishes the underlying legal framework of the environmental legislation in Turkey and is supported by a large number of regulations. Article 10 of the Environmental Law constitutes the main framework of the Environmental Impact Assessment Regulation (EIA Regulation) published in the Official Gazette No. 29186 and dated 25 November 2014.

Environmental Impact Assessment (EIA) encompasses the identification of potential positive and negative effects of the planned projects on the environment, the measures to be taken to avoid adverse effects or minimize them to a degree not harmful to the environment, the determination and assessment of the selected location and technology alternatives, and the efforts to be maintained for the monitoring and control of the implementation of projects.

The purpose of EIA Regulation is to regulate the administrative and technical procedures and principles to be followed throughout the EIA process. This Regulation covers the aspects for which type of projects the EIA Application File, EIA Report and Project Presentation File will be required and the issues addressed by these files, the administrative and technical procedures and principles to be followed during the EIA process, the monitoring and supervision of the projects covered by EIA during the application, pre-construction, construction, operational and post-operational phases, and the necessary training activities for the effective and widespread implementation of the EIA system in environmental management and for the strengthening of its organizational structure. Annex-1 to the Regulation includes the List of Projects Which EIA Applies to, while Annex-2 includes the List of Projects Which Selection Criteria Apply to. The Ministry of Environment, Urbanization and Climate Change (MoEUCC) has the authority to make "EIA Positive", "EIA Negative", "EIA Required" or "EIA Not Required" decisions about the projects subject to this Regulation. However, the Ministry may delegate, when deemed necessary, its authority to render an "EIA Required" or "EIA Not Required" decision to a Governor's Office in line with the principle of the breadth of authority, with the limits of authority determined.

Pursuant to the regulation, an EIA Report must be prepared for the projects included in Annex-1, for the projects included in Annex-2 and for which the "EIA Required" decision is rendered, and for the projects that are considered excluded from EIA, but whose new capacity is equal to or above the threshold value given in the list of Annex-1 but in case of any planned capacity increase.

Within the scope of EIA, for the projects included in the Annex-1 list, a public participation meeting is held to inform the public about the investment and to receive their opinions and suggestions regarding the project with the participation of the Project Owner and the institutions and organizations authorized by the MoEUCC on the date determined by the MoEUCC and at the place and time determined by the Governorship. Public participation meetings are not held for the projects included in the Annex-2 list.

As a result, the activities under this Project are not included in Annex-1 and Annex-2 according to the Turkish EIA legislation, and therefore the Project is considered as out of scope. However, within the scope of the World Bank's Operating Policy on Environmental Assessment (OP 4.01) among categories A, B or C depending on the degree of potential impacts, the Project has been identified as Category B as its environmental and social impacts are typically site specific. In this context, for Category B projects, a public participation meeting will be held with the affected, interested groups and local NGOs after the draft ESMP report is prepared.

The exclusion letter given by the Provincial Directorate Environment, Urbanization and Climate Change is presented in Appendix-B.

Table 3-1 presents the summary of national laws and regulations aiming to minimize the potential environmental and social impacts that may arise during the construction and operation activities of the Project.

Table 3-1. National Environmental and Social Legal and Policy Framework

National Environmental, Legal and Political Framework	
Environmental Impact Assessment	
Environmental Law	Law No: 2872; Date of Ratification: 1983
Regulation on Environmental Impact Assessment	Official Gazette No. 29186 dated 25 November, 2014
Environmental Permit and License Regulation	Official Gazette No. 29115 dated 10 September 2014
Water	
Groundwater Law	Law No: 167, Date of Ratification: 1960
Water Pollution Control Regulation	Official Gazette No. 25687 dated 31 December 2004
Regulation on the Monitoring of Surface and Groundwater	Official Gazette No. 28910 dated 29 December 2012
Regulation on Water Intended for Human Consumption	Official Gazette No. 25730 dated 17 January 2005
Air	
Regulation on Air Quality Assessment and Management	Official Gazette No. 26898 dated 06 June 2008
Exhaust Gas Emission Control Regulation	Official Gazette No. 30004 dated 11 March 2017
Regulation on Control of Exhaust Gas	Official Gazette No. 30004 dated 11 March 2017
Soil	
Soil Conservation and Land Use Law and Applicable Regulation	Official Gazette No. 25880 dated 03 July 2005
Regulation on Control of Soil Pollution and Point Source Contaminated Lands	Official Gazette No. 27605 dated 08 June 2010

National Environmental, Legal and Political Framework	
Noise	
Regulation on the Ambient Noise Emission Caused by Equipment Used Outdoors	Official Gazette No. 26392 dated 30 December 2006
Regulation on Assessment and Management of Environmental Noise	Official Gazette No. 27601 dated 04 June 2010
Energy Efficiency	
Energy Efficiency Law	Official Gazette No. 5627 dated 2 May 2007
Waste	
Waste Management Regulation	Official Gazette No. 29314 dated 02 April 2015
Regulation on the Control of Waste Electrical and Electronic Equipment	Official Gazette No. 28300 dated 22 May 2012
Regulation on the Control of Excavation Soil, Construction and Demolition Wastes	Official Gazette No. 25406 dated 18 March 2004
Packaging Waste Control Regulation	Official Gazette No. 30283 dated 27 December 2017
Medical Waste Control Regulation	Official Gazette No. 29959 dated 25 January 2017
Regulation on the Control of Waste Batteries and Accumulators	Official Gazette No. 25569 dated 31 August 2004
Medical Waste Control Regulation	Official Gazette No. 29959 dated 25 January 2017
Regulation on the Management of Waste Oils	Official Gazette No. 30985 dated 21 December 2019
Waste Vegetable Oil Control Regulation	Official Gazette No. 29378 dated 06 June 2015
Regulation on the Control of End-of-life Tires	Official Gazette No. 26357 dated 25 November 2006
Communiqué on the Transport of Wastes by Road	Official Gazette No. 29301 dated 20 March 2015
Zero Waste Regulation	Official Gazette No. 30829 dated 12 July 2019
Nature Conservation	
Forestry Law	Official Gazette No:6831 dated 05 June 1986
National Social Legal and Policy Framework	
Community Health and Safety	
Public Health Law	Law No: 1593, Date of Ratification: 1930
Law on Disabled People	Law No: 5378; Date of Ratification: 2005
Regulation on Special Educational Services	Official Gazette No: 30471 dated 07. August.2018
Regulation on Special Care Centers for Disabled People	Official Gazette No: 29878 dated 04.December 2016
Health and Safety Signs Regulation	Official Gazette No. 28762 dated 11 September 2013
Highway Traffic Regulations	Official Gazette No 23053 dated 18 August 1997
Labor and Working Conditions	
Occupational Health and Safety Law	Law No: 6331, Date of Ratification: 2012
Regulation on Contractors and Sub-contractors,	Official Gazette No. 27010 dated 27 September 2008
Labor Law (No. 4857)	Official Gazette No. 25134 dated 10 June 2003
Law on Trade Unions and Collective Bargaining Agreements	Official Gazette No. 28460 dated 7 November 2012
First Aid Regulation	Official Gazette No. 29429 dated 29 July 2015
Regulation on Health and Safety Requirements for the Use of Work Equipment	Official Gazette No. 28628 dated 25 April 2013
Regulation on Procedures and Principles of Occupational Health and Safety Training of Employees	Official Gazette No. 28648 dated 15 May 2013

National Environmental, Legal and Political Framework	
Stakeholder Engagement	
Laws on Right to Information (No. 4982)	Official Gazette No. 29186 dated November 25, 2014

3.2 International Standards

WB governs projects and activities by the Safeguard Policies to assure that they are conducted in an environmentally, financially and socially sound manner. Safeguard Policies include Environmental and Social Assessments and other instruments that address adverse environmental and social effects of projects as well as their prevention, reduction and mitigation. These policies are expanded in the "World Bank Operations Manual" that provides further guidance on the Operational Policies (OP) and compilation. The following Operational Policies are triggered for this project and included within the framework of this ESMP;

Environmental Assessment Policy (OP 4.01)

The purpose of this policy is;

- To ensure the projects proposed for Bank financing are environmentally and socially sound and sustainable,
- To inform decision-makers about the nature of environmental and social risks, and
- To increase transparency and involvement of decision-makers in the decision making process.

For the purposes of the WB O.P. 4.01, projects are classified in categories A, B or C depending on the severity of their potential impacts on the environment:

Category A projects; projects with impacts which could potentially result in significant and diverse environmental and/or social impacts and issues in the future and which could not be easily identified at the time of classification.

Category B projects; projects with environmental and/or social impacts that are specific to the location of the facility and/or with impacts that could be easily identified and prevented.

Category C projects; projects resulting in minimum or no environmental and social issues.

FI projects; financial intermediation activities.

This Environmental and Social Management Plan has been prepared by the Project Owner for the investments defined and outlined within the scope of the Project as required by the WB OPs.

When preparing the ESMP, the operational policies listed above were determined considering the scope of the project as well as the geographical, natural and demographic structure of the region. Upon the assessment, the project category was regarded as Category B.

Natural Habitats (OP 4.04);

- The construction works under the project will not affect critical or non-critical natural habitats since the project area is unnatural and altered.
- Subprojects with a significant impact on a recognized critical habitat or ecosystem will be considered inappropriate for being funded within the scope of OP 4.01, and the key point to be addressed in the EIA study will be identifying the subproject alternatives in terms of location and scope.
- If the potential impact of a subproject on natural habitats is significant or if the impact is on critical natural habitats, the top priority will be to tackle the problem by identifying a new location. If this is not possible, appropriate mitigation measures will be adopted for the relevant circumstances.

Physical Cultural Resources (OP 4.11);

- In the first step of baseline studies, literature and superficial studies are conducted.
- Based on these studies, potential impacts on these resources and associated mitigation measures are assessed in the EIA/ESIA. However, buried properties (e.g. tombs or mounds) may not be identified during baseline studies due to the nature of physical cultural resources.
- The key point here has two dimensions:
  - Identification of “artefacts found by chance” during construction, and
  - potential impact of the project on known cultural values.

Involuntary Resettlement (OP 4.12);

- Involuntary resettlement may cause severe long-term hardship, impoverishment, and environmental damage unless appropriate measures are carefully planned and carried out.
- For these reasons, the overall objectives of the Bank's policy on involuntary resettlement are the following:
  - Involuntary resettlement should be avoided where feasible, or minimized, exploring all viable alternative project designs.
  - Where it is not feasible to avoid resettlement, resettlement activities should be conceived and executed as sustainable development programs, providing sufficient investment resources to enable the persons displaced by the project

to share in project benefits. Displaced persons should be meaningfully consulted and should have opportunities to participate in planning and implementing resettlement programs.

The Project has been evaluated according to the Involuntary Resettlement Policy and no land acquisition is required under the Project.

The World Bank Group's (WBG) General Environmental, Health and Safety (EHS) Guidelines should be adopted for this project. For this reason, this project will meet the relevant requirements of EHS Guidelines. If national regulations differ from the levels and measures presented in EHS Guidelines, the more stringent one will apply.

Turkey is a signatory to many international agreements, including the:

- Stockholm Convention on Organic Pollutants,
- Convention on Long-range Trans-Boundary Air Pollution (CRLTAP),
- Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade,
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal,
- Kyoto Protocol regarding to the United Nations Framework Convention on Climate Change,
- Montreal Protocol on Substances that Deplete the Ozone Layer,
- Barcelona Convention for the Protection of Marine Environment and the Coastal Region of the Mediterranean,
- Vienna Convention for the Protection of the Ozone Layer,
- Protocol on Environmental Protection to the Antarctic Treaty,
- ILO Conventions;
    - ILO Convention on Forced Labor,
    - ILO Convention on Freedom of Association and Protection of the Right to Organize,
    - ILO Convention on Right to Organize and Collective Bargaining,
    - ILO Convention on Equal Remuneration,
    - ILO Convention on Abolition of Forced Labor,
    - ILO Convention on Discrimination (Employment and Occupation),
    - ILO Convention on Minimum Age,
    - ILO Convention on Worst Forms of Child Labor,
- Paris Agreement.

3.3 Major Gaps between the Turkish EIA Regulation and World Bank's Environmental Assessment Policy (OP 4.01)

The Turkish EIA procedures are, with some exceptions, in line with the WB Policies. The primary exceptions are in project categorization, the scope of environmental and social assessment, and land acquisition, resettlement, and public consultation. In cases where the Turkish legislation differs from WB Policies, the more stringent one will apply to the implementation of the project.

The gaps between the WB Environmental Policy and the National Legislation are presented in Table 3-2 below.

Table 3-2. Comparison between the World Bank Environmental Policy and the National Legislation

Steps	EIA Regulation	World Bank OP 4.01
Screening	The EIA Regulation classifies the proposed projects into two categories: 1. Annex-I Projects: Projects with considerable potential impacts, which require an EIA process and EIA Report. 2. Annex-II Projects: Projects with or without considerable potential impacts on the environment.	Within the scope of WB OP 4.01, the proposed projects are classified into three categories: 1. Category A: A proposed project is classified as Category A, if it is likely to have significant adverse environmental and social impacts (depending on the type, location, sensitivity, and scale of the project and the nature and magnitude of its potential environmental impacts). In general, these impacts are major, irreversible, sensitive, variable, cumulative, precedent, and potentially influential over an area broader than the sites and facilities financed under the project. 2. Category B: A proposed project is classified as Category B if its environmental and social impacts are typically site-specific and structurally irreversible and if its impacts are less adverse than those of Category A subprojects and if mitigatory measures can be designed more readily than for Category A subprojects. The projects classified as Category B sometimes vary from the same type of Category A projects only in terms of their scale. 3. Category C: A proposed project is classified as Category C, if it is likely to have minimal or no adverse environmental impacts. If a project financed by the WB includes a series of sub-projects that are selected by a Financial Intermediary (FI) and financed by the WB loan, the project is classified as Category FI.
Public Participation Meeting	For the projects included in the list of Annex-1, which therefore require the preparation of an EIA report, the public participation meeting, whose place and date is decided by the Provincial Directorate, is held not later than 10 days	For all Category A and B subprojects proposed for WB funding, the borrower will consult and consider the views of the project-affected groups and non-governmental organizations regarding the environmental impacts of the subproject during the EA process.

Steps	EIA Regulation	World Bank OP 4.01
	prior to the meeting by disclosing it publicly in local and national newspapers. No public participation meeting is held for the projects included in the list of Annex-2.	
Scope of Environmental Assessment	For the projects in the list of Annex-1, an EIA Application File (EAF) will be prepared in line with the format given in Annex-3 to the EIA Regulation. According to the information given in the EAF, a special EIA report format will be prepared based on the views of committee members to be formed by the Ministry, and the EIA report will be written in line with this format, and then submitted to the Ministry. For the projects in the list of Annex-2, a Project Introduction File (PIF) will be prepared based on the format given in Annex-4 to the EIA Regulation. The prepared report will be submitted to the Provincial Directorate of Environment.	For Category A subprojects, the borrower is responsible for preparing an ESIA report that examines the project's potential negative and positive environmental and social impacts, compares them with those of feasible alternatives, and recommends any measures needed to prevent, minimize, mitigate, or compensate for adverse impacts and improve environmental and social performance. The scope of the environmental and social assessment document for a Category B subproject may vary from subproject to subproject, but it is narrower than that of Category A ESIA. As with the ESIA required for Category A, the borrower will investigate the potential negative and positive environmental and social impacts of the subproject, and will recommend measures required to prevent, minimize, mitigate or compensate for adverse impacts and enhance environmental and social performance. When the project category is identified as B; this information could be included in ESMP, if there are no site-specific problems that require a site-specific assessment process in addition to ESMP.
EA Review and Approval	The Committee will review the draft version of EIA report for the projects in the list of Annex-1. Then, the final EIA report containing the committee's assessments will be submitted to MoEUCC for final review. MoEUCC will determine whether EIA is positive; an "EIA Positive" decision is rendered, the project will not be continued further. The PIF prepared for the projects in the list of Annex-2 will be reviewed by the Provincial Directorate of Environment, and the "EIA Required" or "EIA Not Required" decision will be taken accordingly. For the projects for which the "EIA is Required" decision is rendered, the procedure governing the projects in the list of Annex-1 will apply.	For projects involving Financial Intermediaries (FI), the financial intermediary is responsible for meeting the requirements in OP 4.01. Normally, the EA process should be completed by the Financial Intermediary before the subproject is approved for funding of WB loan.
Disclosure	The EIA Report for the projects in the list of Annex-1 will be made available to the public opinion at the headquarters of MoEUCC or provincial directorates. Following MoEUCC's final assessment of the EIA report, the Governor's Office will disclose its reasoned decision publicly.	In addition to the points given in the Public Participation section, the Financial Intermediary will make the draft ESIA report prepared in local language for Category A subprojects available at a public place accessible to project-affected groups and local Non-governmental organizations (NGOs). Upon finalization of a Category A subproject ESIA report, the Financial Intermediary will

Steps	EIA Regulation	World Bank OP 4.01
	For the projects in the list of Annex-2, the final PIF will be disclosed publicly at the Provincial Directorates.	submit an English copy of the final report to the WB together with the English Executive Summary. The Bank will distribute the executive summary to its executive directors, and discloses it publicly on an external website. For Category B subprojects, the Financial Intermediary will submit an English copy of the final version of the Category B EA report to the WB and the WB will disclose it publicly on an external website.
Implementation, Monitoring and Inspection	Pursuant to the EIA Regulation, MoEUCC will monitor and inspect the projects that are regarded as "EIA Not Required" or "EIA Positive", respectively, according to the provisions provided in PIF or EIA Report. In addition, the project owner should submit monitoring reports to MoEUCC, and MoEUCC needs to submit these reports to the Governor's Office for announcement to the public.	During subproject implementation, the Financial Intermediary will report to the World Bank on (a) compliance with measures agreed with the Bank on the basis of the findings and results of the EA and additional social assessments, if any, including implementation of ESIA, and (b) the findings of monitoring programs. The Bank will base supervision of the project's environmental aspects on the findings and recommendations of the Environmental Assessment, including the measures outlined in legal agreements, ESMP, and other project documents.

Source: ILBANK "Sustainable Cities Project - II Additional Financing Environmental and Social Management Framework", April 2019

This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliği, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklaşa finanse edilmektedir

4 ENVIRONMENTAL BASELINE OF THE PROJECT

4.1 Project Location and Topography

The Project is located in Eskişehir Province, Odunpazarı District, Çankaya Neighborhood, Şahin Tepesi locality. The project area is located 1.5 km from Eskişehir's city center. Odunpazarı District is geographically located in the west of Eskişehir Province and, there are 85 neighborhoods exist in Odunpazarı District. There is no village in the district as per the Law for Metropolitan Municipalities. The location of the project area is presented in Figure 4-1.

Figure 4-1. Project Area

Odunpazarı District having a surface area of 2,682 km² is located in the south of Eskişehir city center. The district is surrounded by Tepebasi (Eskişehir) District in the north, Alpu (Eskişehir) District in the east, Seyitgazi (Eskişehir) District in the south, Mahmudiye District in the south-east and Merkez (Kütahya) District in the west.

The plains in the Sakarya and Porsuk basins and the mountains surrounding these basins forms the topographical structure of Eskişehir, which is located in the northwest of the Central Anatolian Region. The most important stream within the region is Porsuk Stream, which thoroughly crosses Eskişehir city center from the west to east and shows a plain topography. Due to its topographical structure, the Province rises from the center to the boundaries and

reaches an average elevation of 847 m. Approximately 21% of the land is covered by mountains, 25.8% by plains and 52.4% by plateaus. Odunpazarı District, where the Project is located, is in the Porsuk Plain.

4.2 Land Use

The project area will be built on 1,898.63 m² of land in Çankaya Neighborhood, Şahin Tepesi Locality Parcel No. 24806, Block No. 1, which belongs to Odunpazarı Municipality. Currently, the project area is not used by the municipality or stakeholders, and the parcel on which the project is planned is defined as a public service area in the master development plan (see Figure 4-2). Project area is not used by any formal or informal user.

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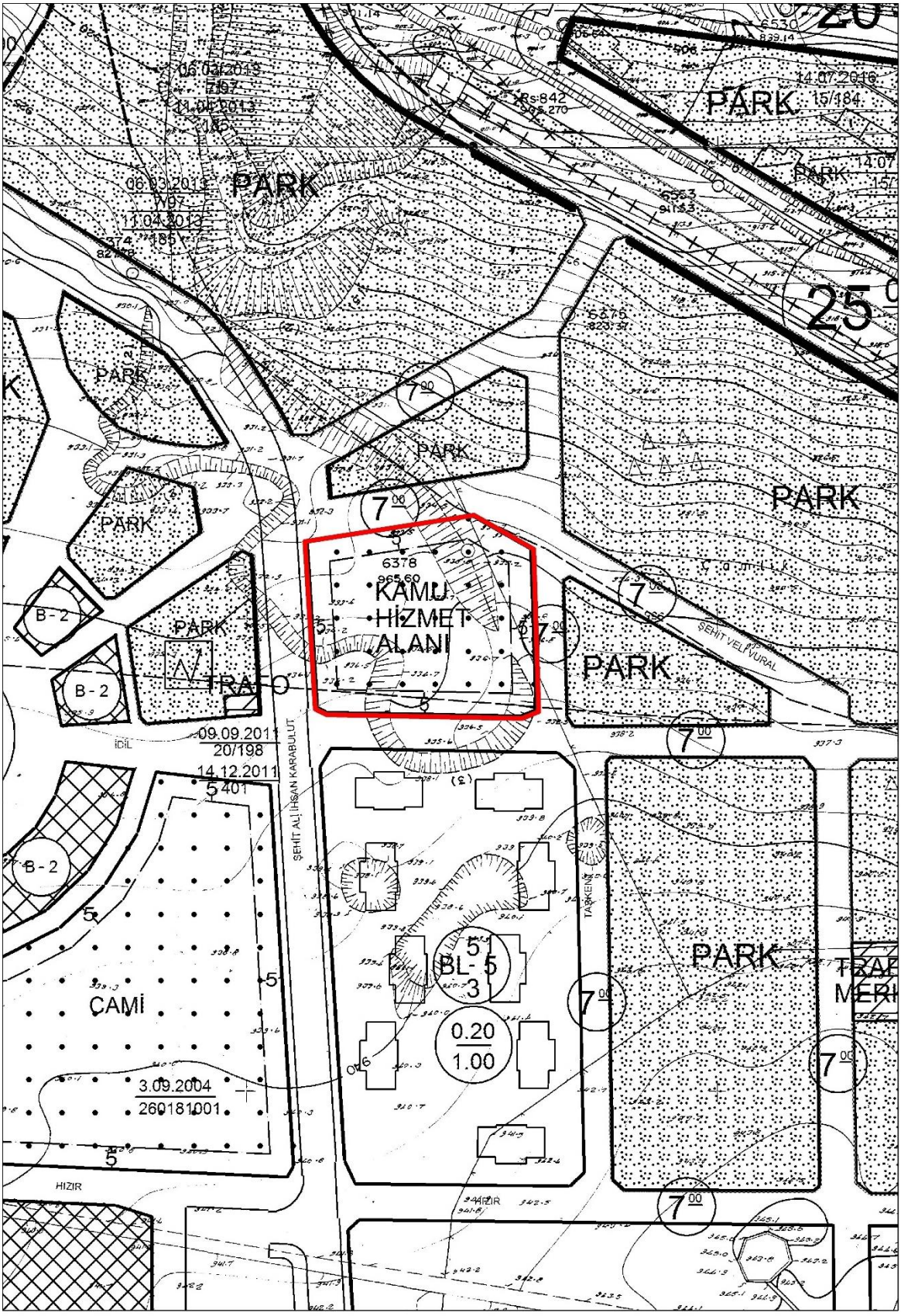

Figure 4-2. Land use

4.3 Geology

4.3.1 General Geology

The basins of Sakarya River as well as Porsuk and Sarısu Streams cover Eskişehir Province area. As the slopes of the basins towards the sea are not steep, the rivers have formed very wide plains by piling up the materials that they carry from the higher parts of the basins to the low parts of Eskişehir province area that is mostly covered by plateaus and mountains. Alpu Plain is located in the east and Inonu Plain is located in the west of Odunpazarı District.

Hilly areas with approximate elevations of 1000 m exist in the south of Eskişehir Province. Odunpazarı District is located in the plain area where Porsuk Stream flows in meanders. In the north of this plain area, there are mountainous and plateau areas that locally reach elevation of 1700 m. In the north, this mountainous area descends to the narrow and deep Central Sakarya Plain where Sarıyar and Gökçekaya dams are located.

Odunpazarı and the surrounding region, which is located in the southern part of Central Sakarya Basin, completed its geological evolution between Jurassic and Holocene. A stack comprised of metamorphic, ophiolitic, metadetritic, volcanic and sedimentary rocks exist in this area. The assemblage consisting of metamorphic and ophiolitic rocks has a trend from east to west. The present geological structure of the region emerged as a result of the geological events that developed from the end of Triassic to the present. As a result of the compressions oriented from north to south in the region, east-west oriented thrust and normal faults were formed in the north and south of the Eskişehir Plain. With the effect of normal faults, the region extending in Inonu-Eskişehir-Alpu direction has become a depression plain.

In the region, there are units whose ages ranges between pre-Jurassic (Triassic) and Holocene. Metamorphic-ophiolite-metadetritic tectonic assemblage, which formed before Jurassic, exists at the bottom. Over these units, Jurassic, Cretaceous, Eocene, Miocene and Pliocene old alluvium (loosely connected clay, silt, sand and gravel) as well as Holocene new alluvium (clay, silt, sand and gravel) exist.

The lithological units in Odunpazarı and its vicinity are as follows from bottom to top: Paleozoic schist and marbles, Mesozoic flysch, limestone and ophiolites, Paleogene conglomerate and limestones, Neocene conglomerate, andesite, tuff, limestone and basalts, Quaternary old and new alluviums (Urbanization, 2020).

1/250,000 scale geological map of the project area is presented in Figure 4-3.

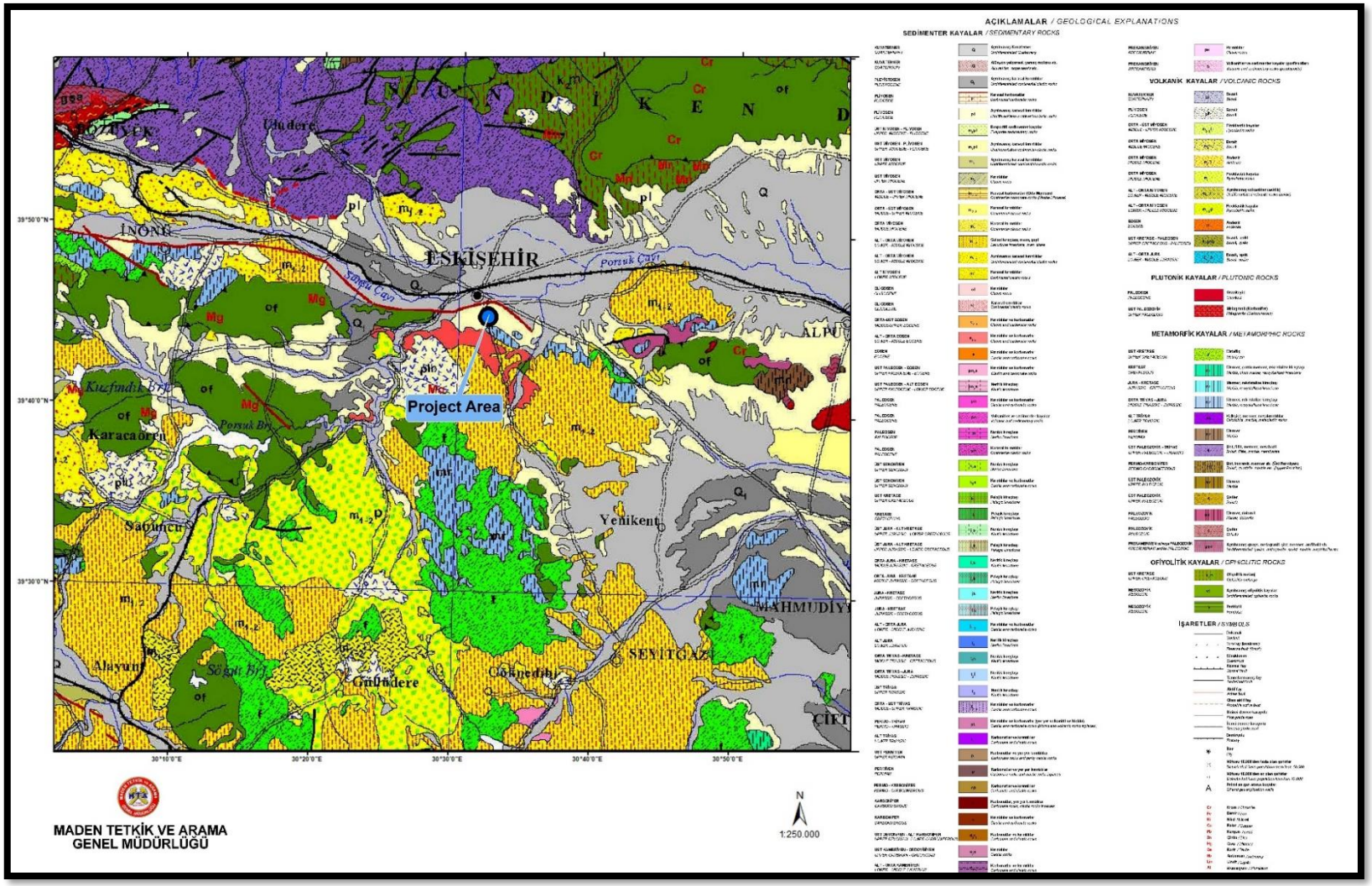

Figure 4-3. Geological Map of the Project Area

4.3.2 Tectonics

Imbricated structures and thrusts were formed in the regions located to the northwest of Sivrihisar due to the events that developed in an ocean (dipping towards the north), which was closed at the end of the Triassic, in Odunpazarı District and its vicinity. However, this imbricated system, which completed its formation at the end of Triassic, was also influenced by other structural movements. East-west oriented fault systems were developed as a result of the north-south oriented compressions, which were dominant at that period.

Similarly, north-south oriented compressions developed during and after Upper Cretaceous influenced the region and they especially caused the formation of strike-slip faults in the Jurassic-Upper Cretaceous units. On the other hand, normal faults were formed in the direction of Inonu-Eskişehir-Sivrihisar as a result of the tectonic events (north to south oriented stresses) that developed during Neogene. This fault system that crosses Eskişehir is called as Eskişehir Fault Zone (see Figure 4-4) and the distance from the fault to the project area is 2.8 km. In addition, it points out that there are 3 types of fault systems including thrust faults, normal faults and strike-slip faults (Gözler, Cevher, Ergül, & Asutay, 1996).

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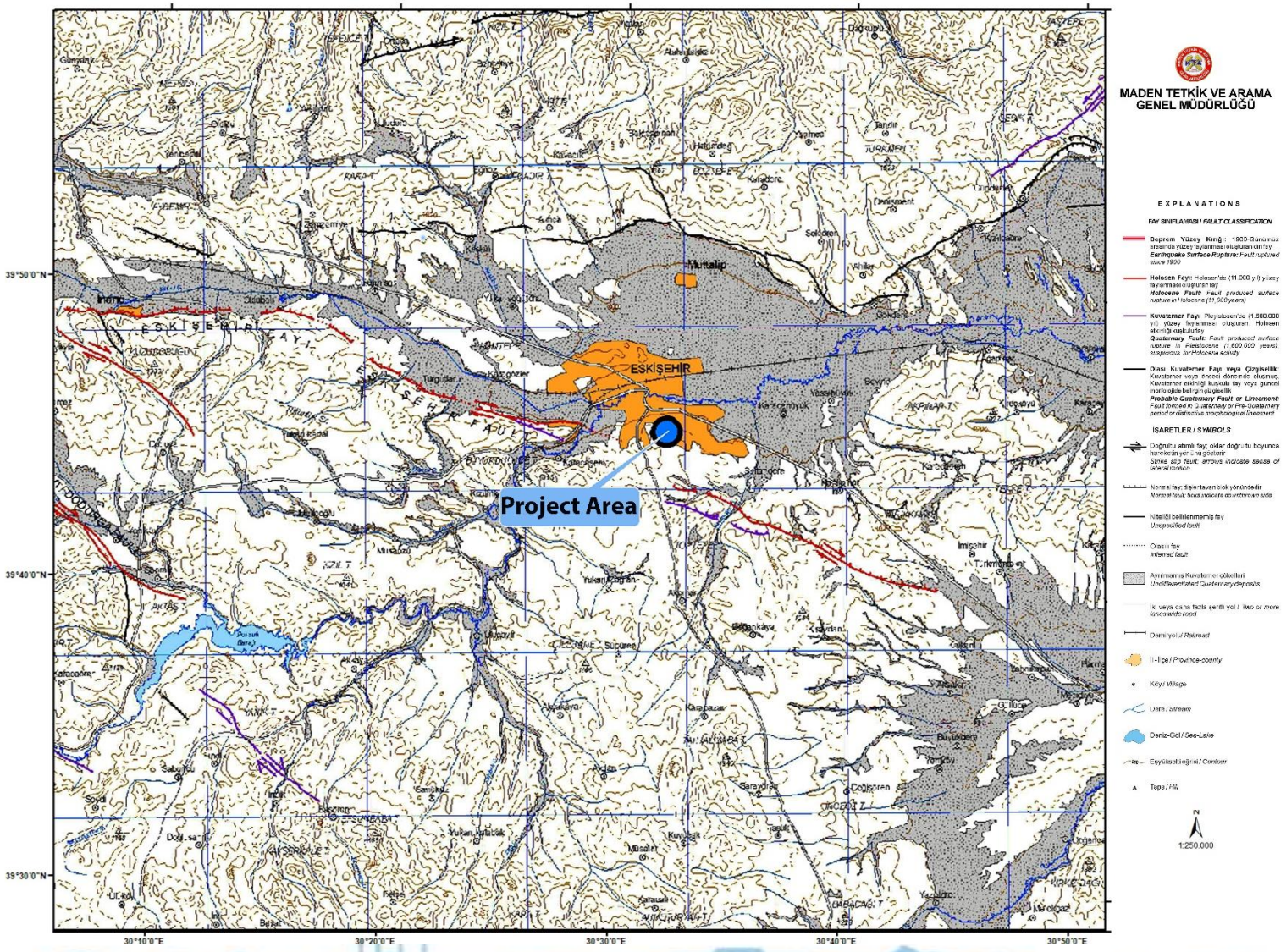

Figure 4-4. Active Faults Map of Eskişehir Province and Its Surroundings

When all these studies are taken into consideration, researchers acknowledge that only the Eskişehir Fault Zone, which passes through the south of Eskişehir, is active amongst the faults observed in and around the study area.

Major earthquakes as well as the ones with medium magnitude have occurred in Eskişehir and its surroundings within the last instrumental 100-year-period and the largest earthquake during this period is the one occurred on February 20, 1956 (M=6.4), which caused damages in Eskişehir, Bilecik and Bozüyük city centers and vicinity thereof (Koçyiğit, 2005).

4.4 Soil and Soil Quality

Within the scope of the "Regulation on Control of Soil Pollution and Point Source Contaminated Lands", 22 preliminary activity information form applications were approved by Eskişehir Metropolitan Municipality in 2019 through the Contaminated Sites Information System, and a total of 576 activity preliminary information forms were evaluated. In Eskişehir Province, there is no contaminated site detected within the years (2015-2019) as of the date of the aforementioned regulation.

Since the project area has not been used for activities such as agriculture, trade or storage, soil pollution is not expected.

4.5 Hydrogeology

In the Eskişehir Plain, the groundwater level generally ranges between 0.5-7.5 m during the spring months, which is the wettest season of the region, and it can be found as 20-30 m depths in some locations. On the other hand, the groundwater level varies between 2-13 m during the summer months, when the least amount of precipitation is observed.

Whereas the groundwater reaches a deeper level in the Pleistocene Akçay Formation that outcrops in the northwest of Odunpazarı District and it changes between 5-6 m in the alluvium. Although the change in the groundwater level is between 0.1 and 1.5 m during April-May and July-August months, it is between 0.1 and 0.5 m in Odunpazarı and its surroundings. The location of the groundwater within Odunpazarı and its surroundings is generally controlled by Porsuk Stream (Kaçaroğlu, 1991).

4.6 Noise

The noise level measurement was recently performed by 2U1K on October 21 and 22, 2021 at the closest residential unit, which is 25 m away from the project area. The measurement study was carried out in order to determine the baseline noise levels in the project area. Since there are roads that are in use and woodland between other sensitive receptors and the project site, the closest point to the project site was chosen in order to minimize the impact of these roads on the measurements and to reflect the worst-case scenario. The geographical coordinates of the noise measurement point is given in Table 4-1. The location of noise

measurement point and measurement photo are shown in Figure 4-5 and Figure 4-6, respectively. Noise measurement report is presented in Appendix-C.

Table 4-1. Measurement Point

Measurement Location	Coordinates	
	Latitude	Longitude
Closest Residential Unit to the Project Area	39.756224°	30.536354°

Figure 4-5. Location of Measurement Point

Figure 4-6. Measurement Photo

The measurement results of the baseline noise levels are given in Table 4-2, whereas the comparison table for the baseline noise levels with the limit values specified in WBG General EHS Guidelines - Noise Management and Annex VII of Regulation on Assessment and Management of Environmental Noise (RAMEN) is provided in Table 4-3.

Table 4-2. Measurement Results of the Baseline Noise Levels

Measurement Location	Date	Measurement Type	Measurement Result (dBA)		
			L_{eq}	L_{90}	L_{Amax}
Closest residential unit to the project area	21.10.2021	Leq-daytime	69.3	45.7	74.2
	22.10.2021				
	21.10.2021	Leq-evening	53.9	43.3	76.7
	22.10.2021				
	21.10.2021	Leq-night	53.9	43.3	76.7
	22.10.2021				

Table 4-3. Comparison of the Baseline Noise Levels with Limit Values in WBG General EHS Guidelines and RAMEN

Measurement Location	Date	Measurement Type	Measurement Result (dBA)			WBG General EHS Guidelines Limit Value		RAMEN Limit Values	
						$L_{eq}A_{day}$ 07:00-22:00	$L_{eq}A_{night}$ 22:00-07:00	$L_{eq}A_{day}$	$L_{eq}A_{night}$
			L_{eq}	L_{90}	L_{Amax}	$L_{eq\text{-}daytime}$	$L_{eq\text{-}night}$		
Closest residential unit to the project area	21.10.2021	Leq-daytime	69.3	45.7	74.2	**55**		**60**	
	22.10.2021	Leq -night	53.9	43.3	76.7		**45**		**50**

Based on the measurements results shown in Table 4-2 and Table 4-3, the baseline noise levels are above the limit values set forth in the Annex VII of Regulation on Assessment and Management of Environmental Noise.

As per the WBG General EHS Guidelines - Noise Management, day and night noise limit values for residential receptors are 55 dBA and 45 dBA, respectively. Noise impacts should not exceed these levels or result in a maximum increase in background levels of 3 dB at the nearest receptor location off-site. Consequently, as seen in Table 4-3, measured noise values are above the national and international day and night limit values. It is predicted that the reason for this exceedance is the proximity of the project area to the airport, main jet base, and highways that are heavily used.

4.7 Air Quality

The PM_{10} level measurement was recently performed by 2U1K on October 21 and 22, 2021 at the settlement closest to the project area. The geographical coordinates of the air quality measurement point, which is 25 m away from the project area, are given in Table 4-4. The location of measurement point and measurement photo are given in Figure 4-7 and Figure 4-8 respectively. Air Quality Measurement Report is given in Appendix-D. Since there are roads that are in use and woodland between other sensitive receptors and the project site, the closest point to the project site was chosen in order to minimize the impact of these roads on the measurements and to reflect the worst-case scenario.

Table 4-4. Measurement Point

Measurement Location	Coordinates	
	Latitude	Longitude
Closest residential unit to the project area	39.756224°	30.536354°

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Figure 4-7. Location of Measurement Points

Figure 4-8. Measurement Photo

The measurement results of the baseline PM10 values are given in Table 4-5 together with the limit values specified in WBG General EHS Guidelines - Air Emissions and Ambient Air Quality and Annex I of Regulation on Air Quality Assessment and Management (RAQAM).

Table 4-5. Baseline PM_{10} Measurement Results

Measurement Location	Date	PM_{10} Measurement Result ($\mu g/m^3$)	Limit Values ($\mu g/m^3$)		
			WBG General EHS Guidelines	EU Air Quality Standards	RAQAM
Closest residential unit to the project area	11-12.112021	43	50	50	50

As seen in Table 4-5, measured PM_{10} values are below the national and international limit values.

4.8 Waste Management

Excavation and Demolition Waste

In addition to the Keskin Construction and Excavation Waste Recycling Facility, which are the waste areas that Eskişehir Metropolitan Municipality works with, and the Excavation, Construction/Demolition and Asphalt Waste Recycling Facility in Sarısungur District, there are also excavation and soil storage areas belonging to the Eskişehir Metropolitan Municipality.

According to the provisions of the Regulation on Control of Excavated Soil, Construction and Demolition Wastes, the vegetative soil is used by Eskişehir Metropolitan Municipality and relocated in the areas, in line with the demands of public institutions and organizations and citizens for rehabilitation of parks, recreation, and filling purposes.

The product recovered from the construction and demolition wastes is given to the official institutions free of charge by the Eskişehir Metropolitan Municipality, and it is ensured that the product is used in daily cover material for landfills, filling, and infrastructure works.

Transportation of Excavated Soil, Construction and Demolition Wastes

Excavation management information system was established by Eskişehir Metropolitan Municipality. It is a system in which the permits of transportation vehicles are managed in the excavation soil and construction/demolition waste management processes in accordance with the provisions of the Regulation on Control of Excavation Soil, Construction and Demolition Wastes. Vehicles in the current operation can be taken under control via the vehicle tracking system, and the facilities are operated depending on the automation system.

This system allows only authorized vehicles to be taken to the facilities with the cameras integrated into the license plate recognition system, where the preparation and control of waste dispatch permit documents can be tracked.

Excavation soils are brought to the Eskişehir Metropolitan Municipality facility with the Excavation Soil Transport and Acceptance Certificate obtained from the District Municipalities.

Zero Waste Management

Odunpazarı Municipality has Zero Waste Certificate. Odunpazarı Municipality Directorate of Cleaning Affairs monitors and coordinates the implementation of the Zero Waste System in municipal service buildings, construction sites and throughout the Odunpazarı Municipality.

Odunpazarı Municipality signed a protocol with Akka Environment Waste Management and Trade Inc. for the collection, transportation, and evaluation of packaging waste at the source.

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Akka Environmental Waste Management, under the coordination of Odunpazarı Municipality Cleaning Affairs Directorate, will set up the Packaging Information System and perform the separation, collection, and evaluation of packaging wastes at the source. It will also undertake the task of coordinating the organization of training meetings on "Zero Waste" for schools and citizens (Odunpazarı Municipality Directorate of Cleaning).

4.9 Water Resources

Sakarya, which is one of the most important rivers in Turkey, is in Eskişehir Province. It has lots of tributaries and its most important tributary is Porsuk Stream. Other tributaries are Sarısu, Seydisu, Bardakçı and İhsaniye Streams. Porsuk Stream arises near Tokul Village in the south of Kütahya Province, passes through Kütahya and Eskişehir provinces and joins Sakarya River in the east of the Alpu Plain. Porsuk Stream forms the district boundary of Odunpazarı.

The raw water needs of Eskişehir Province for drinking and using purposes is met from the upstream of the Karacaşehir Regulator, which is located at the entrance of the Porsuk Stream to the Eskişehir City center. The map showing Porsuk Stream, which is 1.7 km away from the project area, is presented in Figure 4-9.

Figure 4-9. Map Showing Porsuk Stream and Project Area

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There is no natural lake within the provincial boundaries. However, Gökçekaya Dam Lake, which is on Sakarya River, as well as Porsuk Dam Lake, located on Porsuk Stream are important water sources. The map showing these two dams is shown in Figure 4-10. In addition, there are several of ponds for irrigation purposes within the provincial boundaries.

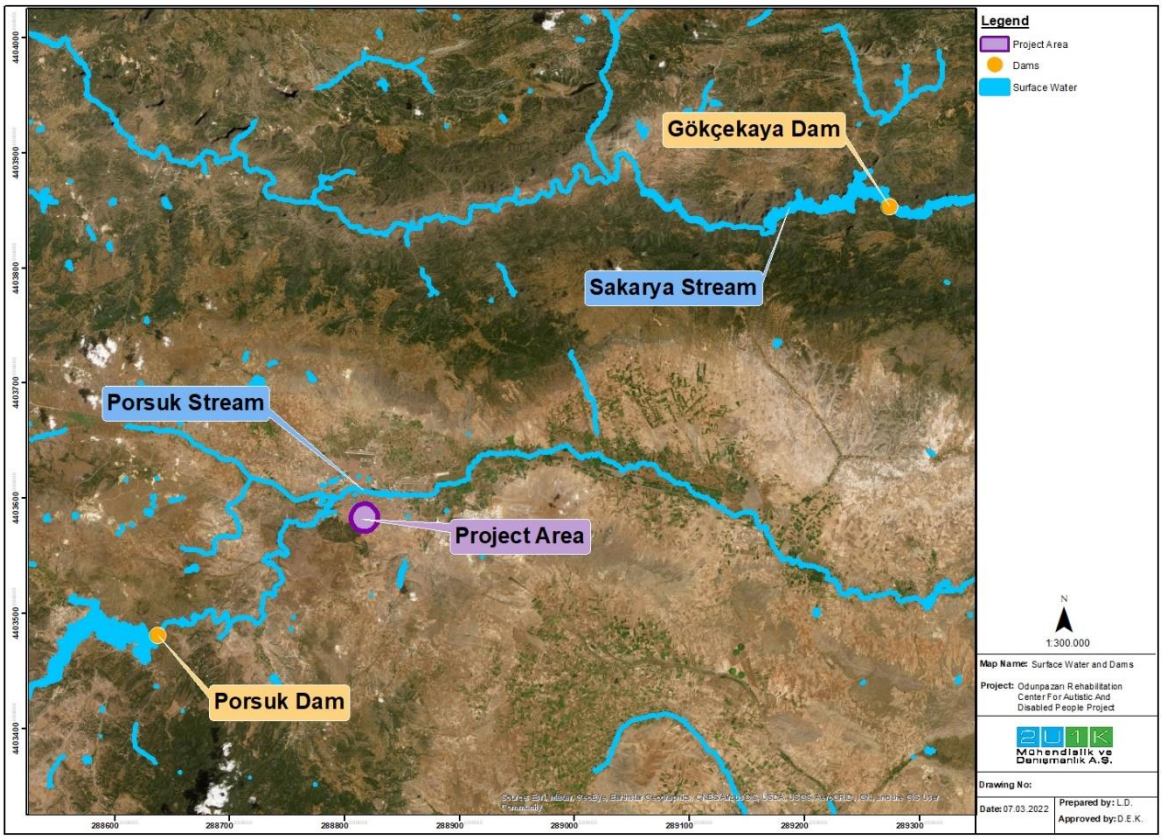

Figure 4-10. Map Showing Gökçekaya and Porsuk Dam Lakes

4.10 Climate and Vegetation

According to the data gathered during the last 92 years at Odunpazarı Meteorology Station that belongs to the Turkish State Meteorological Service of MoEUCC, the annual precipitation average is determined as 372.9 mm, annual average temperature is determined as 11.3°C and the annual relative humidity value is determined as 54.9%. Between 1928 and 2020, the minimum temperature was measured as -26.6°C in February 1942 and the maximum temperature was measured as 38.7°C in July 1945.

According to the climate classification of the Turkish State Meteorological Service, Odunpazarı District is included in the sub-arid regions.

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Table 4-6. Long Term Meteorological Data of Eskişehir Province (1928-2020)

ESKISEHIR	January	February	March	April	May	June	July	August	September	October	November	December	Annual
Measurement Period (1928 - 2020)													
Average Temperature (°C)	0.1	1.8	5.4	10.7	15.5	19.2	21.9	21.8	17.8	12.4	7.0	2.3	11.3
Average Maximum Temperature (°C)	3.8	6.5	11.4	17.3	22.1	26.0	29.0	29.4	25.5	19.6	12.8	6.2	17.5
Average Minimum Temperature (°C)	-3.4	-2.2	0.1	4.3	8.7	11.9	14.3	14.3	10.4	6.0	2.0	-1.1	5.4
Average Sunshine Duration (hours)	2.4	3.3	4.6	5.9	7.9	9.6	10.7	10.2	8.2	5.8	3.7	2.2	6.2
Average Precipitation Days	12.6	11.1	10.7	10.4	10.8	7.5	3.9	3.0	4.1	7.1	9.1	12.1	102.4
Monthly Total Precipitation Amount (mm)	41.0	35.6	36.8	36.6	45.5	35.8	14.6	7.9	15.3	24.8	31.0	48.0	372.9
Measurement Period (1928 - 2020)													
Maximum Temperature (°C)	19.2	22.3	29.1	31.2	35.3	36.6	39.2	38.7	38.0	33.4	25.6	21.4	39.2
Minimum Temperature (°C)	-23.6	-23.8	-16.5	-7.2	-1.0	0.5	5.0	2.2	-3.7	-7.1	-16.7	-26.3	-26.3

Source: https:// www.mgm.gov.tr / veridegerlendirme/il-ve-ilceler

The summer season is warm, the winter season is cold with precipitation in the region, where severe continental climate characteristics are observed. In Eskişehir Province, the regions around the Sakarya Valley, which also includes Odunpazarı District, receive the most precipitation.

At first glance, although the climate of Eskişehir Province shows a transitional climate between Western Anatolia and Central Anatolia, a severe continental climate is generally observed in the province despite the prevailing continental climate in the province, there are some microclimate areas possessing the characteristics of Marmara and Mediterranean climate in the Sakarya valley.

The vegetation of Eskişehir Province is under the influence of steppe vegetation of Central Anatolia as well as the forest vegetation of Northern and Western Anatolia. Forestland within the province starts at an elevation of 900 m. Forests are generally black pine. Besides these, Scotch Pine, red pine, oak, hornbeam, beech as well as juniper trees grow in some places. Also, there are some heathlands composed of wood waxen and blackberry. In the river dam, there is a sparse forest cover consisting of willow and poplar, and in some parts of the regions with rough terrain in the north and south, oak trees are in the form of shrubs. Meadow and pasture lands constitute 26% of the provincial land.

4.11 Natural Disaster Potential

When the earthquake activity of Turkey is taken into consideration, Eskişehir region is not included in the 1st degree region in terms of the earthquake risk. However, Eskişehir is a transition zone between the Aegean Region, which is a 1st degree earthquake zone, and North Anatolian Fault Zone. Eskişehir Fault, whose details are given in Section 4.3.2, passes near the District. The District is included in the 2nd Degree Disaster Region. The distance of

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Eskişehir Fault line to the project area is 2.8 km.The location of the project area on the Seismic Hazard Map is shown in Figure 4-11.

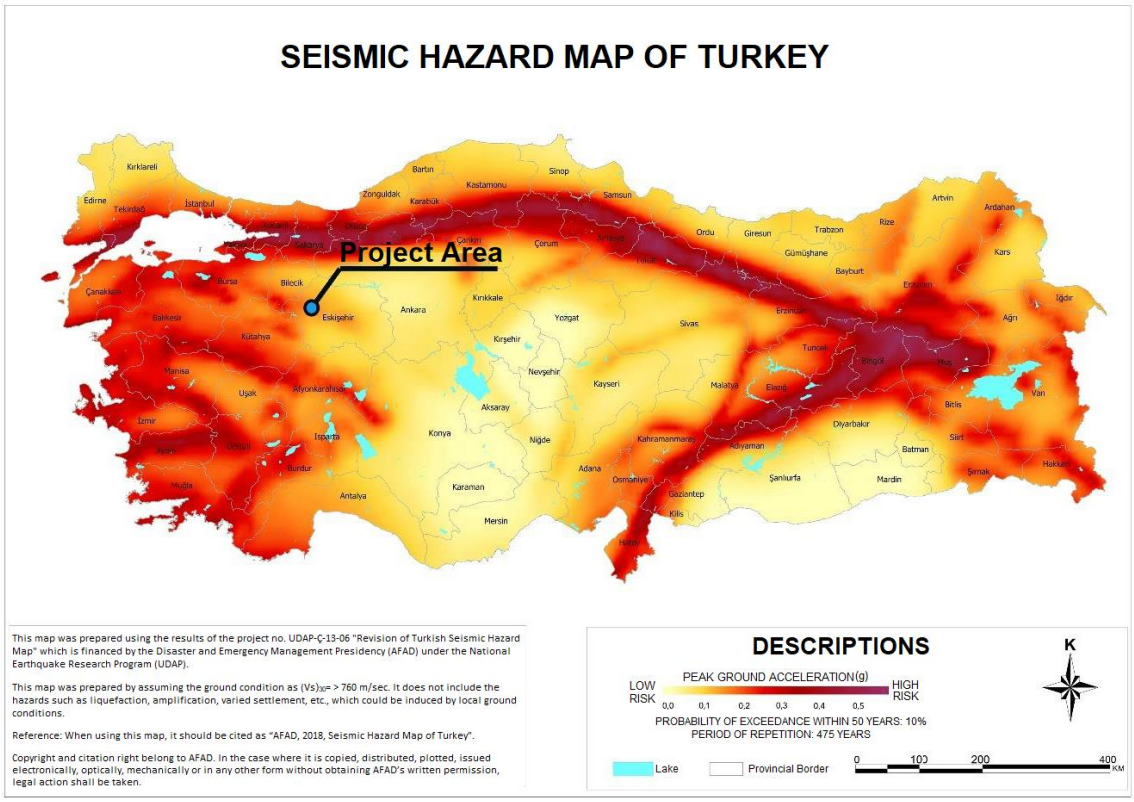

Figure 4-11. Seismic Hazard Map

4.12 Biodiversity and Protected Areas

The project area is under the influence of continental climate and according to CORINE Land Cover Data, the habitat at the project area is defined as discontinuous urban fabric and green urban areas. There is no natural habitat within the immediate surroundings of the project area. Additionally, there is no biodiversity element that will form a critical habitat in the project AoI (see Figure 4-12).

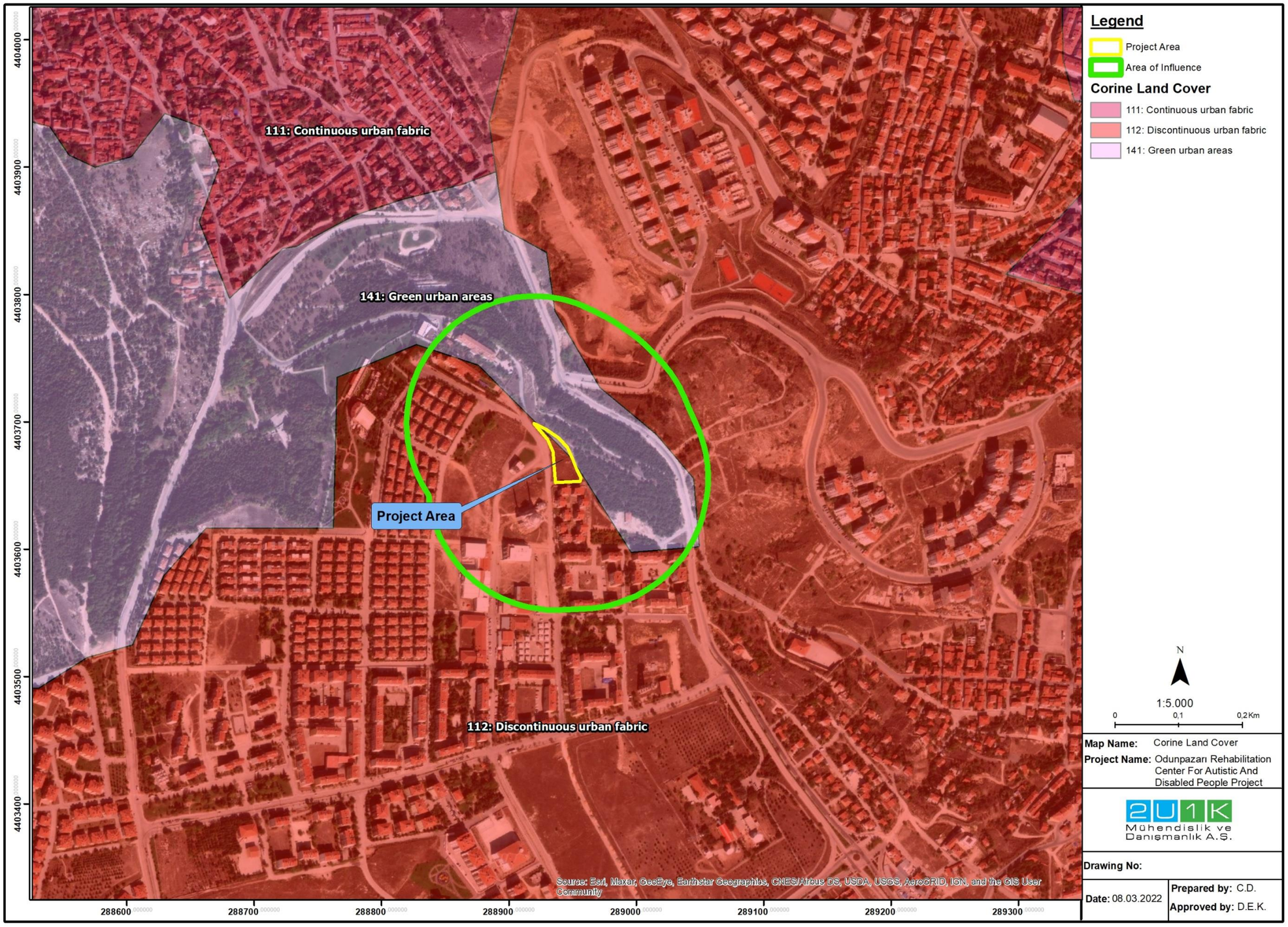

Figure 4-12. CORINE Habitat Classes at the Project Area and Its Immediate Vicinity

Due to the intense anthropogenic impact observed in the project area, the distribution of flora and fauna is highly suppressed. The flora and fauna species that can be observed in the area comprise cosmopolitan species that have adapted themselves to the conditions of the settlement area. In terms of flora species, especially the cultural species are distributed. On the other hand, the fauna distributed in the project area consists of species that are highly tolerant of the effects of settlements, such as intense human presence, noise and traffic. Even though the "Green City Areas" have wide distributions within the area, the fact that they are surrounded by the city has made this area isolated from natural habitats. For this reason, fauna movement is restricted within the area. No fauna entry from natural habitats seems possible except for bird species. Mixed black pine-broad leaved vegetation is dominant in the area.

The flora and fauna species provided in Table 4-7 - Table 4-9 are compiled by the findings of the field study carried out on 26.07.2021 and the literature research.

Table 4-7. Flora Species Identified as a Result of the Studies [5] [6][7]

NAME OF THE SPECIES	ENGLISH NAME	ENDEMISM	IUCN	BERN
Asteraceae				
Centaurea depressa	Low Cornflower	-	-	-
Apiaceae		-	-	-
Artedia squamata	-	-	-	-
Dipsacaceae				
Dipsacus laciniatus	Cutleaf Teasel	-	-	-
Convolvulaceae				
Convolvulus arvensis	Field Bindweed	-	-	-
Fabacae				
Medicago minima	Bur Medick	-	-	-
Trifolium ochroleucum	-			
Lamiaceae				
Lamium purpureum	Sulphur Clover	-	-	-
Liliaceae				
Allium atroviolaceum	Broadleaf Wild Leek	-	-	-
Poaceae				
Secale cereale	Rye	-	-	-
Festuca callieri	Fescue	-	-	-
Aceraceae				
Acer platanoides	Norway maple	-	-	-
Platanaceae				
Platanus orientalis	Oriental plane	-	-	-

[5] Davis, P.H. (ed.). (1965-1988). Flora of Turkey and the East Aegean Islands, vol. 1-10, Edinburgh Univ. Press: Edinburgh.

[6] Ekim, T. ve ark. Türkiye Bitkileri Kırmızı Kitabı. Türkiye Tabiatını Koruma Derneği. Yayın No:18 (2000).

[7] Tarıkahya, B. , Erik, S. & Mutlu, B. (2011). Ankara Yerleşim Merkezinin, Çevresindeki Alanlarla Floristik Yönden Karşılaştırılması . Manisa Celal Bayar Üniversitesi Eğitim Fakültesi Dergisi , 1 (2) , 60-77 .

NAME OF THE SPECIES	ENGLISH NAME	ENDEMISM	IUCN	BERN
Pinaceae				
Pinus nigra	Black pine	-	-	-

Flora species identified in the project area do not contain any species included in the IUCN list. In addition, these species do not have endemic status, either.

Table 4-8. Bird Species Identified as a Result of the Studies [8] [9] [10]

NAME OF THE SPECIES	ENGLISH NAME	ENDEMISM	IUCN	BERN
Columbidae				
Columba livia	Rock Pigeon	-	LC	Annex-3
Streptopelia decaocto	Eurasian Collared Dove			
Corvidae				
Corvus monedula	Western Jackdaw	-	LC	-
Pica pica	Magpie	-	LC	-
Fringillidae				
Fringilla coelebs	Finch	-	LC	Annex-3
Carduelis carduelis	Goldfinch	-	LC	
Hirundinidae				
Delichon urbicum	Common House-Martin	-	LC	
Motacillidae				
Motacilla alba	White Wagtail	-	LC	Annex-2
Passeridae				
Passer domesticus	House Sparrow	-	LC	-
Paridae				
Parus major	Great Tit	-	LC	Annex-2
Parus caeruleus	Eurasian Blue Tit	-	LC	Annex-2
Strigidae				
Athene noctua	Little Owl	-	LC	Annex-3
Sturnidae				
Sturnus vulgaris	Grackle	-	LC	-
Turdidae				
Turdus pilaris	Juniperus	-	LC	Annex-3
Turdus merula	Blackbird	-	LC	Annex-3

[8] BirdLife International 2003 BirdLife's online World Bird Database: Search for Species. Version 2.0. Cambridge, UK: BirdLife International. Available: http://www.birdlife.org

[9] Kiziroglu, I. (2009). The Pocket Book for Birds of Turkiye, ISBN: 975-7460-01-X, Ankamat Matbaası, Ankara, 564 s.

[10] https://ebird.org/home

Table 4-9. Mammal Species Identified as a Result of the Studies[11]

NAME OF THE SPECIES	ENGLISH NAME	ENDEMISM	IUCN	BERN
Muridae				
Mus musculus	House Mouse	-	LC	-
Rattus rattus	Black Rat	-	LC	

All of the fauna species identified in the project area are included in the LC "Low Concern" category. In addition, these species do not have endemic status, either.

Nationally Protected Areas in the Project Area and Its Vicinity

In the project area and its immediate vicinity, there are no protected areas within the scope of the National Parks Law No. 2873.

Internationally Recognized Areas in the Project Area and Its Vicinity

There is no Internationally Recognized Area in the immediate surroundings of the project area.

[11] A Demirsoy, N Yiğit – 2003, Memeliler: Türkiye omurgalıları: Türkiye omurgalı faunasının sistematik ve biyolojik özelliklerinin araştırılması ve koruma önlemlerinin saptanması

5 SOCIAL BASELINE OF THE PROJECT

This section compiles the quantitative and qualitative data regarding the social baseline condition of the Project. The socio-economic baseline study is intended to describe socio-economic conditions and trends in areas that are potentially affected by the Project to have an understanding of potential impacts and to develop appropriate mitigation measures. The socio-economic baseline identifies major socio-economic issues in the province and local communities and develops a socio-economic database that can be leveraged to monitor any post-Project changes in affected communities.

The following topics were selected to discuss the socio-economic indicators of the settlements around the project area:

- Cultural Heritage,
- Traffic and Transportation,
- Demography and Population,
- Livelihoods and Employment,
- Education,
- Health,
- Vulnerable Groups,
- Infrastructure and Services,
- Land Acquisition,
- Level of Information about the Project.

A site visit was conducted on July 26, 2021, to directly observe the project site, identify sensitive receptors and determine whether there are formal/informal users on the land. During the site visit, a meeting with the project owner was held and preliminary information about the Project was obtained. Neighborhood headmen could not be reached during the site visit.

The primary data regarding the communities living around the Project area and the potential project impacts were obtained through key informant interviews with the headmen of Çankaya and Erenköy Neighborhoods conducted by phone calls on September 27, 2021.

Secondary data has also an important role in understanding the socio-economic baseline and potential social risks and impacts. The information obtained from secondary data enhances the quality of baseline studies. This set of data was collected and prepared using regional and national statistics and project documents.

5.1 Cultural Heritage

Odunpazarı District, which is one of the oldest settlement locations of Eskişehir Province, is famous for its historical houses from the Ottoman Empire. The region was called as Dorylaion

during the Byzantine period and was conquered by Seljuks in 1176, and it remained as Sultanönü Sanjak for a long time. There are plenty of historical structures and monuments in Odunpazarı District from Seljuks, Ottoman and Republic periods.

In order to evaluate the construction area and its surroundings planned to be realized within the scope of the Project in the context of cultural heritage, a letter of opinion was requested from the Ministry of Culture and Tourism, Eskişehir Regional Council for the Conservation of Cultural Assets. There is no cultural asset record in the archive of the Regional Council Directorate. In addition, as a result of the on-site inspection by the experts of the Regional Council Directorate, no cultural assets that need to be preserved were found on the surface; If any cultural asset to be protected is found during the activities in the area, the nearest Museum Directorate or Civil Administrative Authority should be notified in accordance with the provision of Article 4 of the Law No. 2863 titled Notification Obligation. The Chance Find Procedure has been prepared to avoid any potential impacts of the Project on any cultural heritage during land preparation work, including excavation (see Appendix-E). The official letter received from the Ministry of Culture and Tourism, Eskişehir Cultural Heritage Preservation Regional Board is attached in Appendix-F.

5.2 Traffic and Transportation

Since there is no activity such as transportation of heavy items or construction crew that will create heavy traffic in the project area both during the construction and operation periods, no additional impact requiring special mitigation measures (such as new access road arrangements or arrangements at critical locations) is expected on the traffic. It is assessed that general mitigation measures such as training of drivers, speed limitations, limitation of unnecessary use of noisy equipment's etc. are sufficient for minimization of traffic impacts. These mitigations are provided in the ESMP (see Section 6.17). On the other hand, the traffic counts were requested from Directorate of Transportation Department by the Project Owner for the intersection of Kartopu Caddesi and Gökçekaya Avenue and/or the intersection of Altay Avenue with Şehit Sabutay Alkan Avenue to evaluate the baseline condition; however, the Directorate informed that no traffic counts are available for these intersections (see Appendix-G).

5.3 Demography and Population

Based on the 2020 data from the address-based population registration system, the population of Eskişehir Province is 888,828 consisting of 443.227 males and 445.601 females.

The project building will be located in Odunpazarı District, which has a total population of 415,230 consisting of 204,703 males and 210,527 females.

Considering the possible impacts that may occur during the construction phase of the Project, a distance of 200 m has been determined as the potential AoI. In this regard, Çankaya and

Erenkoy neighborhoods are located within the AoI where the construction related impacts are likely to be experienced. However, the Project beneficiaries will cover a wider range of local communities as the project will serve all needy stakeholders residing in Eskişehir Province. During the lifetime of the Project, in line with the complaints from the stakeholders, the AoI can be expanded by the experts of Project Implementation Unit.

The population data from official sources regarding the Project AoI and its change in the last 5 years are presented in Table 5-1 and Table 5-2.

Table 5-1. Data on the Population in the Project AoI

Settlement	Female (2020)	Male (2020)	Total Population (2020)
Çankaya Neighborhood	5,951	5,813	11,764
Erenkoy Neighborhood	6,192	6,300	12,492

Source: TurkStat

Table 5-2. Data on Population for the Last 5 Years in the Project AoI

Settlement	Years	Total Population	Total population change in the last 5 years
Çankaya Neighborhood	2020	11,764	Increased
	2019	11,576	
	2018	11.104	
	2017	10,855	
	2016	10,509	
Erenköy Neighborhood	2020	12,492	Decreased
	2019	12,556	
	2018	12,409	
	2017	12,686	
	2016	12,667	

Source: TurkStat

The population data from official sources regarding the project service area and its change in the last 5 years are presented in Table 5-3 and

Table 5-4.

Table 5-3. Data on the Population in the Project Service Area

Settlement	Female (2020)	Male (2020)	Total Population (2020)
Eskişehir	445.601	443.227	888,828

Source: TurkStat

Table 5-4. Data on Population for the Last 5 Years in the Project Service Area

Settlement	Years	Total Population	Total population change in the last 5 years
Eskişehir	2020	888,828	Increased
	2019	887,475	
	2018	871,187	
	2017	860,620	
	2016	844,842	

Source: TurkStat

In the key informant interviews conducted with headmen, it was asked whether there were immigrants and/or refugees in the neighborhoods. It has been learned that 25 people of Syrian origin from 3 households live in Çankaya Neighborhood. In addition to this, it was learned during the interview that there are 10 disabled living in the neighborhood. Although the exact number is not known, it was emphasized that approximately 900 people from Syria, Afghanistan and Iraq live in Erenköy Neighborhood. In addition to these information, 25 people with disability reside in the neighborhood.

5.4 Means of Livelihood and Employment

In Northwest Anatolian Region, which also includes Eskişehir Province, Pontides and Anatolides, which are amongst Turkey's tectonic assemblages, are adjacent to each other. Due to its geological and structural characteristics, this region is very important in terms of both metallic minerals and industrial raw materials. Sepiolite, which is also known as the symbol of the city, is kind of an ornament stone found only in Eskişehir, Central Anatolia in Turkey. Almost all of the commercially mineable deposits of sepiolite, which is also called white gold, sea foam and Eskişehir stone, are in Eskişehir Province (General Directorate of Mineral Research and Exploration(MTA)).

When the sectoral distribution of the workforce is analyzed within the Eskişehir economy, 52.1% of the population is based on services, 32.4% on industry and 15.5% on agriculture. It is seen that the services and industry sectors are prominent in the distribution of the main sectors throughout the provincial economy (Turkish Employment Agency (İŞKUR)).

Businesses that employment- intensely are; Arçelik A.Ş., TUSAŞ Motor Sanayi ve Ticaret A.Ş., Eti Maden Kırka Bor İşletmeleri, Ford Otomotiv Sanayi ve Ticaret A.Ş., Eti Gıda Sanayi ve Ticaret A.Ş.

The main types of agricultural products are cereals, legumes, sugar beets, sunflowers, fruits and vegetables. Agricultural product range has also led the improvement of agriculture based industry. Turkish Sugar Refineries Corporation and numerous facilities that produce biscuits and bakery products in the city are some examples.

Animal husbandry, which is another source of livelihood, is based on small cattle breeding. It is one of the important sources of income for the people who works in the agriculture industry. Sheep and cattle breeding is performed in Mahmudiye and Çifteler districts, which are connected to Eskişehir Province. Also, race horses are bred in the stud farm in Mahmudiye District.

5.4.1 Major Economic Activities in Settlements Located in the Project AoI

Based on the key informant interviews held with the headmen of Çankaya and Erenkoy neighborhoods in the project area, the economic activities are presented in Table 5-5.

Table 5-5. Common Economic Activities in the Project Area

Settlement	First Common Economic Activity	Second Common Economic Activity	Third Common Economic Activity
Çankaya Neighborhood	Public Service/Civil servant	Industry-Service Sectors	Pension
Erenköy Neighborhood	Industry and Service Sectors	Pension	Public Service/Civil servant

Source: Survey study with the headmen, 2021

5.5 Education

According to the data from Eskişehir Provincial Directorate of National Education, there are 495 schools/institutions, 6,557 classrooms, 11,697 teachers and 137,811 students within the provincial borders (Eskisehir Provincial Directorate of National Education). There are 3 universities in Eskişehir with a total number of students of 65.954

In Odunpazarı District, there are 170 schools/institutions, 2,985 classrooms, 5,858 teachers and 76.561 students (Eskişehir Odunpazarı District Directorate of National Education,).

There are 2 primary schools, 2 secondary schools and 2 high schools in Çankaya Neighborhood, which was determined as the Project's AoI. In Erenköy Neighborhood, on the other hand, there are 2 primary schools and 1 secondary school, and besides, there is 1 high school and 1 secondary school whose construction works are still continuing.

5.6 Health

There are 3 state hospitals, district polyclinics and private hospitals in Odunpazarı District.

There are 2 community health centers in Çankaya Neighborhood, which is determined as the project's AoI. In Erenköy Neighborhood, on the other hand, there is one community health center, which is commonly used by 3 neighborhoods (Erenköy, Huzur, Yenidoğan). There is no hospital within the borders of these two neighborhoods. During the survey, the headman of the neighborhood stated that the capacity of the community health center is enough to adequately serve all 3 neighborhoods.

5.7 Vulnerable/Disadvantaged Groups

A site visit was made on 26 July 2021 to directly observe the project site, identify sensitive receptors, and determine if there are formal/informal users on the land. The ownership of the project area belongs to the Project Owner and there is no informal or formal users on the land.

According to the information provided by the headmen of Çankaya and Erenköy neighborhoods, information about vulnerable/disadvantaged individuals/groups was questioned and the groups identified are presented in Table 5-6.

Table 5-6. Vulnerable/Disadvantaged Individuals/Groups in the Project Area

Settlement	Individuals over 65 years of age living alone	Poor families*	Physically / Mentally disabled	Widowed Female Household Head	Child Household Heads
Çankaya Neighborhood	Yes	No	Yes / 10 people	Yes / 3 people	No
Erenköy Neighborhood	Yes	Yes	Yes / 25 people	Yes / 200 people	No

Source: Survey study with the headmen, 2021
** Households, which are depended on social and economic support are defined as Poor Family by headmen.*

5.8 Infrastructure Services

During the Community Level Surveys carried out with the neighborhoods headmen, information on the available infrastructure and services was obtained and are presented in Table 5-7.

Table 5-7. Available Infrastructure Services in the Project Area

Settlement	Water Resource	Irrigation Resource	Sewerage System	Waste Management	Mass Transportation Vehicle	Cooperative / Association	Cultural Heritage
Çankaya	Mains Water	No irrigation water is used.	Yes	Trash collected by the municipality	Minibus, bus, street car	2	-
Erenköy	Mains Water	No irrigation water is used.	Yes	Trash collected by the municipality	Minibus, bus	3	-

Source: Survey study with the headmen, 2021

5.9 Level of Information about the Project

5.9.1 Results of the Key Informant Interviews with Headmen

Community-level information was gathered through key informant interviews by telephone on 17th of September 2021 with Cemil Öztürk, Çankaya Neighborhood's headman, and Osman Çalış, Erenköy Neighborhood's headman. The study aims to measure the level of knowledge of the neighborhood headmen within the scope of the Project in order to have more realistic view of the headmen about potential project impacts and expectation from the project, and to

obtain information about the neighborhood. In the survey, it was observed that the neighborhood headmen were not informed about the project.

In accordance with the environmental and social elements and best practice mitigation measures given in Section 8 within the framework of the Project and based on the requirements of Information disclosure, stakeholder engagement, grievance redress mechanism, stakeholders will be informed before the construction works start.

6 ENVIRONMENTAL AND SOCIAL IMPACTS OF THE PROJECT

6.1 Air Quality

This section assessed the effects of the predicted emissions from the Project on air quality. Air quality measurements results are given in Section 4.6. The measures that will be taken to prevent, minimize or reduce the resulting emissions are given in Chapter 8.

As it is explained in Section 2, AoI is taken as the project area and its vicinity (i.e. 200 m). In particular, the project's environmental impacts are limited to the footprint and these impacts are effective for limited time during construction phase.

6.1.1 Construction Phase

The impact assessment discussed here covers the expected short-term emissions from additional construction activities.

The PM_{10} measurement conducted at the closest residential unit to the project area is below the threshold values, the methods to reduce and effectively manage the negative environmental effects that may occur are provided in Chapter 8.

Exhaust Gases

The source of emissions includes exhaust gases from diesel engines of earthmoving equipment. The measures to be taken to prevent, mitigate and effectively manage negative environmental impacts that are predicted to arise, and the relevant mitigation methods are presented in Chapter 8.

Emission factors given Exhaust Emissions for Construction Vehicles ("Exhaust Emission Factors for Non-road Engine Modeling - Compression-Ignition (Report No. NR-009A)) prepared by the United States Environmental Protection Agency to calculate the amount of possible emissions from the vehicles that will be used during the construction works of the Project is used (see Table 6-1).

Table 6-1. Emission Information of Machinery and Equipment to be Used in Excavation and Construction Works

Machinery – Equipment	Number	Motor power (HP)	Emission Coefficient (g/HP-hour)			
			HC	CO	NO_X	PM
Truck	1	235	0.4	1	4.5	0.4
Backhoe Loader	1	200	0.4	1	4.5	0.4
Excavator	1	260	0.4	1	4.5	0.4
Loader	1	220	0.4	1	4.5	0.4
Total	-	-	**1.6**	**4**	**18**	**1.6**

The vehicles to be used within the construction will be regularly maintained, the exhaust emissions will be measured and recorded by authorized institutions, and the provisions of the Exhaust Gas Emission Control and Gasoline and Diesel Quality Regulation will be complied with.

Dust Emission

The construction activities, can result in dust emissions from a combination of on-site excavation and haulage of soil materials, contact of heavy equipment with the soil, and exposure of soil stockpiles to the wind. In addition to the negative impact of resulting particulate matters on human health, this can give rise to potentially harmful build-up on immovable properties and vegetation.

The emission factors specified in Table 12.6 in Appendix-12 given in the Regulation on Control of Industrial Air Pollution which is used for calculation of dust emissions from excavation activities are presented in Table 6-2.

Table 6-2. Emission Factors to be Used in Dust Emission Mass Flow Calculations

Activity	Emission without Mitigations	Emission with Mitigations
Excavation	0.025 kg/ton	0.0125 kg/ton
Loading	0.010 kg/ton	0.005 kg/ton
Unloading	0.010 kg/ton	0.005 kg/ton

The density of the excavation soil was taken as 1.6 ton/m^3. Calculations have been made with the assumption that 10 hours of work will be done per day and the excavation works will take 10 days. Calculation results are represented in the Table 6-3.

Predicted total excavation amount in m^3 = 1,000 m^3

Predicted total excavation amount in tons = (1,000 m^3) x (1.6 ton/m^3) = 1,600 ton

Table 6-3. Dust Emission During Excavation Works

Machinery – Equipment	Emission without Mitigations	Emission with Mitigations
Excavation	0.40 kg/hour	0.20 kg/hour
Loading	0.16 kg/hour	0.08 kg/hour
Unloading	0.16 kg/hour	0.08 kg/hour
Total	**0.92 kg/hour**	**0.36 kg/hour**

Dust emission from excavation works has been calculated as 0.36 kg/hour in total for the mitigated situation. This value is below 1 kg/hour, which is the limit value given for modeling work in the Industrial Air Pollution Control Regulation.

The measures to be taken to prevent, mitigate and effectively manage negative environmental impacts that are predicted to arise, and the relevant mitigation methods are presented in Chapter 8.

6.1.2 Operation Phase

During the operation phase, no other emission is anticipated from another source but the ones to be caused by heating.

6.2 Water Use

6.2.1 Construction Phase

The contractor has not been assigned within the scope of construction works yet. The contractors to be involved in the construction phase will be selected by tender. During the construction phase, daily potable water demand of personnel will be met by carboys purchased from licensed companies according to the list of licensed companies announced by the Ministry of Health in compliance with the requirements of the Regulation on Water Intended for Human Consumption and Public Health Law.

Although the number of the personnel employed during the construction phase of the facilities is not certain, it is anticipated that approximately 10 people will work. The average daily water consumption per person is regarded as 220 L/day (TurkStat-2018), and the required amount of water for the construction phase of the Project is calculated below.

$$Daily\ water\ demand = number\ of\ people * avg.water\ consumption = 10 * 220$$
$$= 2{,}200\frac{L}{day}(2.20\frac{m^3}{day})$$

During the construction phase, daily potable water demand of personnel will be met by carboys purchased from licensed companies according to the list of licensed companies announced by the Ministry of Health in compliance with the requirements of the Regulation on Water Intended for Human Consumption and Public Health Law. The average daily potable water consumption per person is given as calculated below.

$$Daily\ potable\ water\ demand = number\ of\ people * avg.water\ consumption^{12} = 10 * 2$$
$$= 20\frac{L}{day}(0.2\frac{m^3}{day})$$

The water demand for suppression of dust generated in the project area due to the construction works will be met using Odunpazarı Municipality's Water Trucks which will be filled from the

[12] TR Ministry of Health, General Directorate of Public Health, Turkey Nutrition Guide

municipality's infrastructure. During the construction, potable water and the water used in dust suppression will be supplied from the water supply network in the district.

Within the scope of the project, the total construction area will be 1,898 m². 5 liters of water will be used per meter square. Accordingly, 1,898 m² x 5 L / m = 9,490 L = 9.49 m³ water will be used to prevent dust emission. The said water spraying will be carried out in except when it rains.

6.2.2 Operation Phase

It is predicted that 12 personnel will be employed during the operation phase of the planned project. The average daily water consumption per person is regarded as 220 L/day (TurkStat-2018), and the required amount of water for the operational phase of the Project is calculated below.

$$Daily\ water\ demand = number\ of\ people * avg.water\ consumption = 12 * 220$$
$$= 2{,}640\frac{L}{day}\left(2.640\frac{m^3}{day}\right)$$

Daily drinking water needs of the workers will be provided by carboys purchased from licensed companies according to the list of licensed companies announced by the Ministry of Health in compliance with the requirements of the Regulation on Water Intended for Human Consumption and Public Health Law.

6.3 Wastewater

6.3.1 Construction Phase

The wastewater to be generated during the construction phase will be domestic wastewater from the personnel. It is predicted that 10 personnel will be employed during the construction phase.

Daily water usage per person is regarded as 220 L / (person.day) according to TurkStat data (2018). The amount of water used per day is calculated as 2,200 L/day (2.2 m^3/day). With the assumption that all this water to be used by personnel will turn into wastewater, the amount of generated wastewater is:

$$Wastewater\ Amount = Daily\ water\ consumption * transfer\ percentage = 2{,}200\frac{L}{day} * 1.0$$
$$= 2.200\frac{m^3}{day}$$

The existing sewerage system will be used for the wastewater from the personnel, and this wastewater will be disposed at the Eskişehir Wastewater Treatment Plant.

6.3.2 Operation Phase

It is predicted that 12 personnel will be employed during the operation phase of the planned project. The calculation of the amount of wastewater generated is given below.

Daily water usage per person is regarded as 220 L / (person.day) according to TurkStat data (2018). The amount of water used per day is calculated as 2,640 L/day (2.640 m^3/day). With the assumption that all this water to be used by personnel will turn into wastewater, the amount of generated wastewater is:

$$Wastewater\ Amount = Daily\ water\ consumption * transfer\ percentage = 2{,}640 \frac{L}{day} * 1{,}0$$

$$= 2.640 \frac{m^3}{day}$$

Similar to the construction phase, the existing sewerage system will be used for the wastewater from the personnel, and this wastewater will be disposed at Eskisehir Wastewater Treatment Plant.

6.4 Waste

6.4.1 Construction Phase

Domestic Solid Waste

Domestic solid waste will be generated from the personnel who will work during the construction phase of the project. The domestic solid waste generated will mostly consist of organic waste.

The amount of domestic solid waste from the personnel is calculated according to the data established by TurkStat (2018) that an average of 1.01 kg of domestic solid waste will be generated per person per day in Turkey:

$$Number\ of\ Employees = 10\ people$$

$$Unit\ Solid\ Waste\ Amount = \frac{1.01\ kg}{person \times day}\ (TurkStat - 2018)$$

$$Generated\ Solid\ Waste\ Amount = 10\ \times \frac{1.01\ kg}{person \times day} = \frac{10.10\ kg}{day}$$

The domestic solid waste generated will be stored in available trash containers and collected by the district municipality in garbage trucks. The licensed waste collected will be delivered to solid waste landfills.

Excavation Waste

In accordance with the Regulation on the Control of Excavation Soil, Construction and Demolition Wastes, excavated soil and construction waste producers are responsible for the transportation of the excavated soil and construction waste generated by them to the storage areas that have necessary permissions, using transportation vehicles with the necessary transportation permits.

The excavation soil and construction wastes generated during the construction phase of the Project will be stored in waste storage facilities of the municipality.

Packaging Waste

The packaging waste, such as paper and cardboard, metal, plastic and glass materials, and mixed packaging will be collected separately from other types of waste in specific waste bins. Waste boxes will be collected by licensed packaging waste collectors periodically. The expected amount of packaging waste to be generated is calculated below;

$$Amount\ of\ Packaging\ Waste\ Generated\ (Domestic) = \frac{10.10\ kg}{day} \times 0.2 = \frac{2.02\ kg}{day}$$

Hazardous Waste

During the construction phase of the project, petroleum-based products, such as lubricants, hydraulic fluids or fuels, may result in the potential for release into the environment during storage, transportation or use in equipment. Additionally, contaminated / oily fabrics, cloths and filters, contaminated packaging materials, toner cartridges, paint residues, fluorescent tubes, cleaning cloths and filters, hazardous insulating materials and pressurized tubes are other hazardous wastes that are likely to be generated.

Hazardous wastes that are likely to be generated during the construction phase will be collected separately in specific vessels / containers at the construction site and stored in a specific area that is established on the concrete floor and connected to the drainage channel. The wastes generated should be temporarily stored at their source in line with the criteria set based on their types. The temporarily stored waste will be labeled with the phrase 'hazardous or non-hazardous waste' as well as the waste code, the amount of waste stored and the date of storage.

These wastes will be delivered to licensed disposal / recycling facilities with separate waste codes. Hazardous wastes will be transported by licensed vehicles within the scope of the "Communiqué on the Waste Transportation by Road".

Waste Batteries and Accumulators

Waste batteries will be collected separately in waste battery bins. The collected waste batteries will be delivered to the Portable Battery Manufacturers and Importers Association (TAP) (authorized waste battery collector) for disposal at the licensed facility.

These wastes will be handled in accordance with the procedures and principles of the Regulation on the Control of Waste Batteries and Accumulators. If not handled properly, these wastes can have an adverse impact on human health and the environment.

Medical Waste

During the construction phase, medical wastes will be generated from first aid responses. According to the Medical Waste Control Regulation, medical wastes stored in specific containers and areas will be collected by licensed vehicles and delivered to licensed disposal companies.

It is expected that the medical waste produced during the construction phase will be generated in very small amounts due to first aid actions. While the medical waste is expected to be generated in trace amounts, they can lead to significant effects such as contracting infectious diseases if not handled properly.

6.4.2 Operation Phase

Domestic Solid Waste

Domestic solid waste will be generated from the personnel who will work during the operation phase of the project. The domestic solid waste generated will mostly consist of organic waste.

It is predicted that 12 personnel will be employed during the operation phase of the planned project. The amount of domestic solid waste from the personnel is calculated according to the data established by TurkStat (2018) that an average of 1.16 kg of domestic solid waste will be generated per person per day in Turkey.

$$Number\ of\ Employees = 12\ people$$

$$Unit\ Solid\ Waste\ Amount = \frac{1.16\ kg}{person \times day}\ (TurkStat - 2018)$$

$$Generated\ Solid\ Waste\ Amount = 12\ \times \frac{1.16\ kg}{person \times day} = \frac{13.92\ kg}{day}$$

The domestic solid waste generated will be stored in available trash containers and collected by the district municipality in garbage trucks.

Packaging Waste

The amount of recyclable waste that is potentially generated during the operational phase of the facility is given below;

$$Amount\ of\ Packaging\ Waste\ Generated\ (Domestic) = \frac{13.92\ kg}{day} \times 0.2 = \frac{2.784\ kg}{day}$$

The packaging waste that can be reused and recycled will be collected separately and delivered to collection-sorting facilities or recycling facilities that are granted an Environmental License by the Ministry of Environment, Urbanization and Climate Change. For the management of such wastes, the applicable provisions of the 'Waste Management Regulation' published in the Official Gazette No. 29314 and dated 02.04.2015 and the 'Packaging Waste Control Regulation' published in the Official Gazette No. 30283 and dated 27.12.2017 will be followed.

For the purposes of Article 12 E 16 of the Zero Waste Regulation published in the Official Gazette No. 30829 and dated 12.07.2019; 12. E 16.

- Buildings and settlements in the list of ANNEX-1 must establish and implement a zero-waste management system in line with the implementation schedule. The relevant establishments that start to operate after the specified date should switch to the zero-waste management system within one year from the start of the operation.
- The establishments in the list of ANNEX-1, which are responsible for establishing a zero-waste management system, must be certified for zero waste at the basic level in line with the process defined in Article 17 of the Regulation.

The establishments provided in the list of ANNEX-1 to the regulation are shown in Table 6-4.

Table 6-4. Establishments in the list of ANNEX-1 to the Zero Waste Regulation, obliged to establish a zero-waste management system

	Establishments Required to Switch to Zero Waste Management System	Deadline for Completion of System Switchover
GROUP 1	• **Metropolitan District Municipalities** Population of 250,000 and above	31 December 2020
GROUP 2	• **Metropolitan District Municipalities** Population below 250,000 • **Provincial, District and Town Municipalities Other Than Metropolitan Municipalities** City Center District Municipalities • **Union of Municipalities**	31 December 2021
GROUP 3	• **Provincial, District and Town Municipalities Other Than Metropolitan Municipalities** Municipalities Other Than City Center District Municipalities	31 December 2022

	Establishments Required to Switch to Zero Waste Management System	Deadline for Completion of System Switchover
	• **Special Provincial Administrations** Out of Adjacent Area	

As understood from Table 6-4, Odunpazarı Municipality is in the category of Group 3 Establishments. Pursuant to the regulation, the municipality is expected to pass to the Zero Waste Management System by 31 December 2020.

Hazardous Waste

In case of any hazardous waste generation, such wastes will be stored in the designated storage area. Signs regarding waste codes will be hung, and a sealed container will be available for separate collection based on the waste code. Hazardous wastes will be delivered to licensed disposal / recycling facilities by using licensed transportation vehicles.

Medical Waste

It is likely that medical waste will be generated from the first aid response given in case of any accident or injury during the operational phase of the project.

If any medical waste is generated, red plastic bags of the following qualities will be used: bearing the 'International Biohazard' emblem, resistant to tearing, puncture, explosion, transportation, made of medium density polyethylene, equipped with seal, with double bottom seam and without bellows, with a 100-micron thick double layer, having a minimum lifting capacity of 10 kilograms, and bearing 'Caution Medical Waste' warning on both sides. Medical waste will be collected in colored plastic bags or boxes made of laminated cardboard or containers of the same qualities at a maximum rate of 3/4. Medical waste bags / containers will be delivered to the nearest healthcare provider or the nearest municipality without being compressed with the help of transportation companies authorized for the transportation of such wastes.

6.5 Noise

6.5.1 Construction Phase

The results of the noise measurement performed at the sensitive receptor are below the threshold values and presented in Section 5.5. Noise will be generated from vehicles, machinery and equipment that will operate during the construction activities of the project. The equipment and machines used during the construction will be monitored and maintained at regular intervals.

6.5.2 Operation Phase

No activities that could be considered as a noise source is expected during the operation phase of the planned project.

6.6 Land Use and Soil Quality

6.6.1 Construction Phase

A change in land use is not expected since the project area is located within the boundaries of the existing settlement zone and shown as a public service area in the master development

plan presented in Section 5.1. Since there will be no fuel or similar storage within the project site, it is not anticipated to experience spill-like accidents. Measures to be taken to prevent soil pollution are given in Chapter 9.

6.6.2 Operation Phase

No change in soil quality is expected during operation since there is not any storage or soil related activity.

No change in land use is foreseen during operation phase.

6.7 Landscape

6.7.1 Construction Phase

Although, there are health facilities, commercial units, prayer zones, entertainment venues around the planned area of the Project, it consists of predominantly residential areas. A temporary disturbance due to construction is expected, but it will be of short duration.

6.7.2 Operation Phase

Project building will consist of 4 floors including basement, ground floor, and two normal floors. No significant change is expected in the landscape, as other surrounding structures are at similar heights.

6.8 Biodiversity and Protected Areas

The Project to be constructed will be located within the municipal boundaries and in an unnatural/modified habitat. No natural flora, fauna or protected area is found in the project area. In addition, since the activities to be performed will be restricted to the project area, the natural flora and fauna will not be affected by construction operations under the project.

6.9 Population / Demography

6.9.1 Construction and Operational Phases

Since the construction works for the Project will be carried out in the Odunpazarı district center, it is foreseen by the Project Owner that no accommodation will be built for the employees within the scope of the Project. However, containers can be placed on the project site for those who will work on the project to rest, eat and also for sanitary facilities. These containers will meet standards for worker accommodation prepared by International Finance Corporation

(IFC) and European Bank for Reconstruction and Development (EBRD) and approved by the WB[13].

On the other hand, in the settlements that are expected to be affected during the construction phase of the Project, no negative impact induced by the Project is anticipated regarding the population level.

Any work permits for the workers employed as part of the project will be followed by the Project Owner, and recruitments will be carried out within the framework of legal practices. Recruitments will be performed by checking the legal work permits to meet the labor conditions during construction and operational periods, detailed in Section 6.14.1. Informal, child labor or forced labor will not be allowed.

For the avoidance of any negative impact on the local communities due to presence of workers during the construction phase and their potential interaction with community members, contractors are responsible for providing code of conduct training to each worker and ensuring that all workers are informed about the Code of Conduct and signed it during the recruitment phase before starting to work. The Project Owner will ensure that contractors establish the code of conduct and will check that workers undergo training on communication with the public before starting work.

6.10 Cultural Heritage

In order to evaluate the baseline situation of the project site and its surroundings in the context of cultural heritage, an opinion letter was requested from the Eskişehir Cultural Heritage Preservation Regional Board Directorate. As a result of the evaluations, no cultural assets or archaeological artifacts were identified. If any archaeological remains or artifacts are found during the construction, all activities will be stopped, and the Museum Directorate will be informed in accordance with Article 4 of the Law No. 2863.

6.11 Vulnerable/Disadvantaged Groups

A site visit was made on 26 July 2021 to directly observe the project site, identify sensitive receptors, and determine if there are formal/informal users on the land. The ownership of the project area belongs to the Project Owner and there is no informal or formal users on the land. Project site is presented in Figure 6-1.

[13] https://documents1.worldbank.org/curated/en/604561468170043490/pdf/602530WP0worke10Box358316B01PUBLIC1.pdf

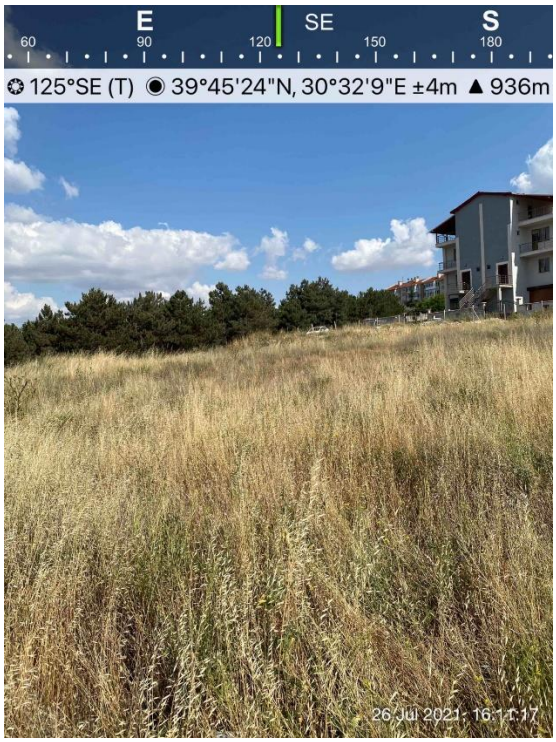

Figure 6-1. Project Site

According to the information provided by the headmen of Çankaya and Erenköy neighborhoods, information about vulnerable groups was questioned and the groups identified are presented in Table 5-6.

The construction works to be carried out for the project works will have a short-term and temporary effect. No displacement or land acquisition is required for the Project. Therefore, it is not expected that vulnerable/ disadvantaged groups within the Project's AoI will be adversely affected by the project. Considering the social benefit of the Project, the Project has the potential to provide benefits for vulnerable/disadvantaged groups.

6.12 Economy / Employment

6.12.1 Construction Phase

It is anticipated that the project will result in temporary employment. Priority will be given to contributing to the local economy through the use of local materials during the construction and to paying attention to the procurement of various goods and services from local resources. It is estimated that 25-30 workers will be employed during different stages of the construction.

6.12.2 Operation Phase

Once the Project is put into operation, trainers and healthcare personnel to be recruited to support the disabled and their families will be selected among the municipality employees. The

details regarding the number of personnel to be recruited is not yet decided but anticipated as 12 people.

6.13 Land Acquisition

6.13.1 Construction and Operation Phases

It was stated during the interviews held for the Project with the representatives of the Project Owner that the land has been in the possession of the municipality. There is no information on exact timing. It is known that it was well before last five years. The land is free of squatters, encroachers, and other encumbrances. There is no informal or formal users on the land. No land acquisition will be required as part of the Project. Similarly, there will be no physical and/or economic displacement within the scope of the Project. (see. Figure 6-2)

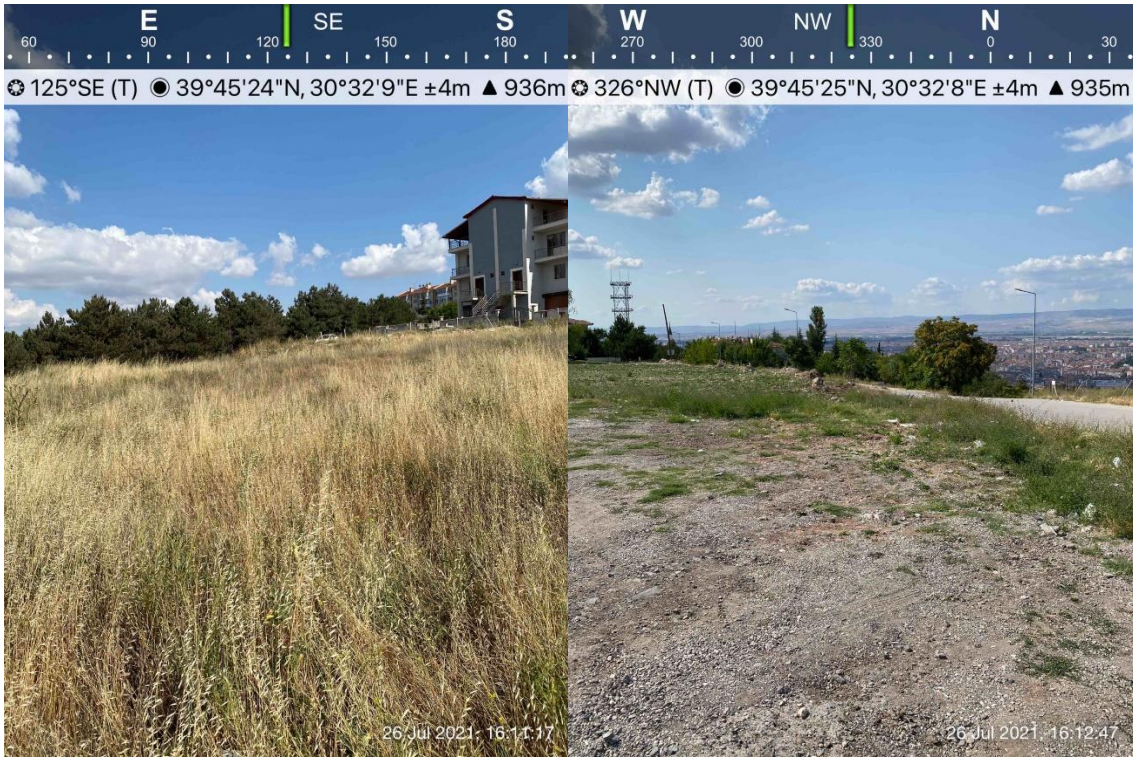

Figure 6-2. Project Site

The title deed of the project area is presented in Appendix-A. The existing access roads will be used for project activities, and no additional land will be acquired for access roads. If additional access roads are needed in the future, an environmental and social impact assessment will be conducted for the proposed route.

Although land acquisition is not planned within the scope of the Project, in the unlikely case, a Land Acquisition and Involuntary Resettlement Plan will be prepared in accordance with the "Land Acquisition and Involuntary Resettlement Policy Framework[14]" of ILBANK SCP-II AF.

6.14 Labor Conditions

6.14.1 Construction and Operation Phases

The Project Owner will be responsible for human resources for construction and operation phases. Turkey is currently in the middle of a harmonization process with the European Union, and labor laws are being reviewed to ensure harmonization. The Project will comply with national labor, social security and occupational health and safety laws as well as the principles and standards of the International Labor Organization convention. Based on the national principles in the International Labor Organization convention, the Project Owner will take the following measures:

- Not employing children under the age of 18,
- Eliminating forced labor and ensuring a Human Resources Policy compatible with the European Convention on Human Rights and the Turkish Constitution,
- Eliminating discrimination based on language, race, gender, political thought, philosophical belief and religion in business relations,
- Ensuring workers' access to the right of collective bargaining (Law No. 6356 on Trade Unions and Collective Bargaining Agreements, and Labor Law No. 4857), and
- Ensuring access to the Project grievance redress mechanism that is functional effectively.

The Labor Law (4857) applies to all workplaces and employers, employees, employer representatives and worker representatives, regardless of the business activity.

6.14.2 Training

The occupational health and safety training will be provided to the employees of contractors as part of each contract executed within the scope of the Project, which will at least include the subjects provided in the Regulation on the Procedures and Principles of Occupational Health and Safety Training of Employees, and the Environmental and Social Monitoring Reports will contain the plans regarding the training to be provided to personnel.

Additionally, the contractor will provide training to its personnel, who will work during the performance of the works, on the environmental and social impacts that should be considered

[14] https://documents1.worldbank.org/curated/fr/713231554109393090/Land-Acquisition-and-Resettlement-Policy-Framework.pdf

during the on-site works and are included in ESMP document. The contractor will keep its personnel informed about the fulfilment of all measures to prevent and/or minimize environmental and social impacts during the on-site construction, subject to the inspection by the Project Owner.

The contractor will ensure that the on-site personnel are primarily trained on the issues that include the risks and protection measures specific to the worker's job and post before actually starting work.

In addition, the training on risks that may arise from the circumstances, such as changes in post or job, replacement of work equipment or application of new technology, will be provided.

Training programs will be repeated at periodically considering the changing and emerging risks provided in the Regulation on the Procedures and Principles of Occupational Health and Safety Training of Employees. Information and training will be provided not only for personnel, but also for the measures to be taken for public health and safety.

The contractor is required to separately and measurably demonstrate (i.e. CV's documenting previous experiences, certificates and training documentation etc.) the knowledge, skills, behaviors and attitudes that the on-site personnel should have regarding occupational health and safety, environmental and social issues.

Scaling and evaluation should be carried out at the end of the training provided. According to the results of the evaluation, the training program can be modified or trainers can be replaced or training can be repeated, if needed, upon determining whether the training is effective.

6.15 Community Health and Safety

Community health and safety issues are associated with risk factors that may arise from construction and operation phases of the Project. It is anticipated that the local people will be affected by the resulting dust and noise especially during the construction phase.

To minimize the impact of the traffic activities that are expected to intensify during the construction phase, the working hours should be adjusted according to the peak hours of transportation. The views of relevant stakeholders will be sought to determine a common working strategy for construction activities to be performed especially in front of and/or around areas, such as schools and hospitals. The construction activities to be performed around or in front of hospitals and/or healthcare providers will be planned not to hinder the public access to these services. Special crossings will be developed by taking additional measures for the elderly, pregnant women, people with small children and disabilities. The Project Owner and Contractors will comply with the measures presented in the ESMP in order to create temporary special crossing so that the construction works to be carried out around the mosque and the residences located next to the project area will not cause unjust treatment to the citizens.

Additionally, contractors will take necessary health and safety measures, such as using appropriate warning signs and signboards and performing irrigation in dry seasons, under the management of the Project Owner during site preparation and construction activities so that the public is informed of the construction plan and locations in a timely manner and the construction sites are determined. Accidents that will threaten the community health and safety may arise from the failure to completely encircle the construction sites and to place the necessary warning signs.

Existing roads will be used within the scope of construction works. Possible damages on road surfaces due to traffic caused by heavy machinery will be rehabilitated by the Contractor. In case of any damage to the infrastructure elements on private lands due to construction activities, it will compensated by the Contractor and Project Owner. Mitigation measures will be implemented by the Contractor. In order to make a clear assessment, present condition of the roads and existing infrastructure can be documented (e.g. by photographs) by the contractor before the start of construction works.

Communities in the vicinity of the project area may be exposed to physical hazards such as exposure to noise, exposure to dust emissions, hazard from electricity, traffic accidents etc. associated with project components during the construction phase. Additionally, confined spaces or falling hazards may occur due to unattended infrastructure. The project area will be fenced to avoid physical hazards to the communities associated with the project, and construction activities will be announced to the affected local people, businesses, and governmental bodies at least two (2) days in advance. During the operation phase of the project, all works such as maintenance, etc. pose no risk since the project area will be an enclosed area.

6.15.1 Measures to Be Taken Against Communicable Diseases and COVID-19 During Construction and Operation Phases

6.15.1.1 Measures to Be Taken Against Communicable Diseases

The Project owner should investigate how the project affects community health. The impact of communicable diseases (for example, HIV/AIDS, Malaria, GB virus, etc.) and risks of transmission on communities in the Project area and the Project personnel should be investigated, and necessary measures should be taken.

The general features of communicable disease agents are listed below.

- Microbes reproduce in the presence of favorable conditions, such as heat, humidity and nutrient medium, increasing in numbers rapidly.
- Some of the germs can lead to diseases in humans, while others can cause diseases in both humans and animals.

- While some germs themselves cause diseases (cholera, flu virus, amoeba, etc.), some can cause diseases (tetanus, botulinum, etc.) through the toxic substances they secrete.
- Some germs can cause local infection at the entry site, while others can cause general diseases.
- Some germs, after penetrating the body, prefer specific organs and tissues and cause diseases (hepatitis viruses settle in the liver; meningitis-causing germs settle in the brain membranes). While some of the germs are transmitted from person to person (hepatitis viruses, flu viruses, etc.), some are not (tetanus, brucella, etc.).
- While some germs can cause epidemics (cholera, typhoid fever, influenza, infectious meningitis, hepatitis A, etc.), some do not (tetanus, etc.)

While the common symptoms of communicable diseases vary depending on the type of disease, they are generally fever, weakness, fatigue, loss of appetite, skin rash, body pain, nausea, vomiting, diarrhea, headache, burning sensation during urination, cough, expectoration, genital discharge, runny nose, chills, shivering, jaundice, increased pulse rate, enlargement of inguinal and armpit lymph nodes, enlarged liver-spleen, increased respiratory rate, neck stiffness, redness-inflammation in the throat, pain, etc.

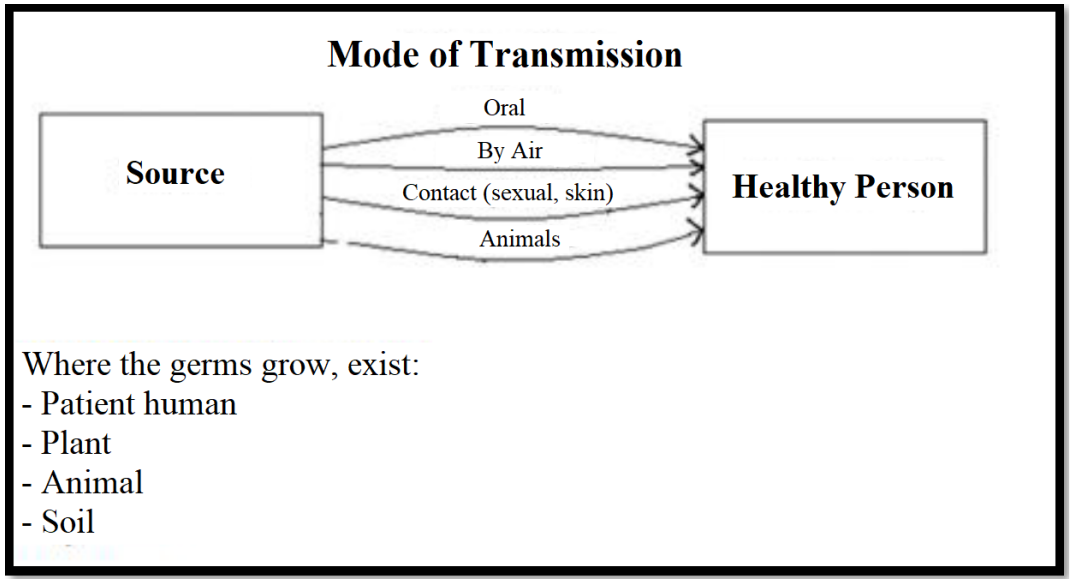

Figure 6-3. Chain of Infection Transmission

The Project Owner will prevent or reduce the likelihood of public exposure to communicable diseases as well as waterborne, water-related and vector-borne diseases that may arise from Project activities. When doing so, the project owner will consider that communities may be exposed to risks at different levels and that vulnerable groups are more susceptible than other groups. For issues involving community health, safety and security, the Project Owner should, during the Project, investigate the opportunities to improve environmental conditions to help

reduce the frequency of these diseases, where certain diseases are endemic in communities. The Project Owner will prevent or reduce the spread of potential communicable diseases from the personnel employed on a temporary or permanent basis for the project.

6.15.1.2 Measures to Be Taken Against COVID-19

The COVID-19 pandemic is a severe and unusual process that requires further measures to be taken based on the Project, as in many areas. As part of the project, the measures determined by the World Health Organization (WHO) will be relied on for the COVID-19 pandemic process. The principles set by WHO were published on September 6, 2021 in the Guidance to COVID-19 Outbreak Management and Working prepared by the Scientific Advisory Board of the Turkish Ministry of Health as broken down by industries. The most important items among the measures to be taken are listed below.

- Personal hygiene and environmental cleanliness should be observed and strictly followed.
- People with symptoms of diseases should be identified and isolated in the workplace.
- People in contact with the diseased should be tracked and close contacts should be handled in accordance with the COVID-19 guide.
- When an employee distressed with fever, cough or respiratory condition is found, the occupational healthcare unit and the provincial/district health authority should be contacted.

6.16 Guidance to COVID-19 Outbreak Management and Working is presented in Appendix-H.Occupational Health and Safety

6.16.1 Construction and Operation Phases

If the necessary measures are not taken during construction works, this may especially result in accidents that will threaten the health and safety of workers. In this regard, the Project Owner and the contractor are liable for providing a safe and healthy working environment for workers. During the construction phase, workers may be exposed to a range of hazards, such as exposure to noise, dust, heat, hazardous chemicals, working at height, working in confined spaces, working with electrical equipment's, working with small cranes etc. Most common OHS Risk areas and general mitigation measures are provided in Table 6-5.

Table 6-5. Common OHS Risks and General Mitigation Measures

Risk Area	General Mitigation Measure
WORKING AT HEIGHTS	• All employees who work at height need suitable training in working on different pieces of equipment, and such work must be planned appropriately. Safety approaches and precautions

Risk Area	General Mitigation Measure
Working from heights is the most common cause of fatal injuries to workers.	should be adopted, such as: Where practical, avoid the need to work at height. • Put collective measures in place where working at height can't be avoided to prevent falls. Such as the use of equipment to provide an extra level of safety to reduce the risk of a fall—for example, a scaffold with a double guard-rail or edge protection. Minimise the consequences of a fall by providing a safety net. • Wear the necessary P.P.E. such as a safety harness.
MOVING OBJECTS A construction site is an ever-changing environment, with many objects moving around, often on uneven terrain. Delivery vehicles, heavy plant machinery and overhead lifting equipment pose a hazard to site workers and operators.	Sites should always be planned to manage plant and pedestrian interface where physical barriers and suitable segregation is in place. To reduce risks, workers should: • Never stand behind large operating plant machinery and never stand under suspended loads. • Avoid working close to moving object and be careful of their surroundings, especially if they do not have lights or beepers. • Always ensure you have a banksman to guide plant vehicles when reversing or manoeuvring on a public road. • Always wear PPE (Personal Protective Equipment) such as a hard hat and high visibility jacket to ensure he/she is seen.
SLIPS, TRIPS, AND FALLS Slips, trips, and falls can happen in almost any environment, and, in construction, there are slightly more common incidents of these kinds of injuries than in other industries. The HSE reports that around a quarter of injuries reported are due to Slips, Trips and Falls. As construction sites often have uneven terrain and the typography is forever changing, it is unsurprising that slips, trips, and falls are a common hazard. HSE reports that several thousand construction workers are injured every year following a slip or trip. Most of these could be avoided by effectively managing working areas and access routes, such as excavations and footpaths.	Managers and Site supervisor on construction sites must effectively manage the site so that workers can move around it safely. Risks should always be reported and sorted to reduce the chances of injury. To reduce harm due to Slips, Trips and Falls; • Keep work and storage areas tidy and designate specific areas for waste collection. • Where surfaces are slippery with mud, they should be treated with stone. • Where surfaces are slippery with ice, they should be treated with grit. • All slippery areas should be signposted, and footwear with a good grip should be worn.
NOISE Working around loud, excessive and repetitive noise can cause long term hearing problems, such as deafness. Noise can also be a dangerous distraction and may distract the worker from the task at hand, which can cause accidents.	A comprehensive noise risk assessment should be carried out where the risk assessment has highlighted a noise hazard with the works to be undertaken.

Risk Area	General Mitigation Measure
HAND ARM VIBRATION SYNDROME HAVS (Hand Arm Vibration Syndrome) is a debilitating and painful disease of the blood vessels, nerves, and joints. It is typically caused by the continued use of hand-held power tools, including vibratory power tools and ground working equipment. Some of the workers at risk of developing HAVS, resulting in the inability to do fine work, and cold temperatures can trigger painful attacks on the fingers. Once the damage is done, it is permanent.	HAVS is preventable if construction works are correctly planned to minimise exposure to vibration during work and workers are monitored are given appropriate protection when using vibrating tools and equipment.
MATERIAL HANDLING – MANUAL AND BY EQUIPMENT Materials and equipment are constantly being lifted and moved around construction sites, whether manually or by equipment. Either way, handling carries a degree of risk.	For manual handling, training must be provided to ensure employees can lift and carry materials safely. For lifting equipment handling, there are lots of risks, especially when operating lifting equipment on uneven ground. If an employee is required to use lifting equipment, they must be trained to operate the equipment safely, and a regular test should be taken to check their ability to use the equipment. Always check your plant is fit for use and that it's certificated and inspected before use.
EXCAVATIONS Incidents commonly occur within excavations on construction sites, such as an unsupported excavation collapsing with workers inside.	Common safety measures that need to be put in place to prevent excavations from collapse and to reduce the risk of operatives falling into excavations. • Never work in an unsupported excavation. • Ensure an excavation is supported and fully secure. • Regularly inspect the excavation both before and during the work shift. • Always check that the edge protection of an excavation is 100% intact before you enter it. • Always maintain a safe distance from the edge of all deep excavations.
ELECTRICITY Most of the accidents arise from contact with overhead or underground power cables and electrical equipment/machinery.	In civil engineering, strikes to services are common. The strikes happen when excavation is undertaken without adequately checking the ground for existing services. Consequently, incidents can easily be avoided by using technology such as CAT and Genny scanning equipment to scan an area and foresee potential services and prevent service strikes.
AIRBORNE FIBRES AND MATERIALS Construction dust is often an invisible, fine, and toxic mixture of hazardous materials and fibers. This can damage the lungs and lead to chronic obstructive pulmonary disease, asthma, silicosis and other such diseases.	All employers have to ensure protective equipment is used.

Risk Area	General Mitigation Measure
SITE SECURITY Having inadequate security around a construction site may danger the public and lead to an unnecessary incident	Always make sure that boundary safety fencing is 100% secure and there are no openings for the public to access.

Occupational accidents and injuries may take place during these activities, if potential risks at various stages of the Project are not managed properly. Potential accidents occurring during the operational phases of projects may lead to potential health concerns associated with non-routine risks.

Given the potential hazards, only trained and authorized personnel may work at height. Safeguarding systems will be used against the risk posed by working at height (guardrails, fall arrest equipment), and restricted zones will be established under the height work zones, and measures will be taken for objects that may fall. Coordination with emergency response teams will be established to ensure that the most accurate first aid is given in case of accidents. The Emergency Action Plan will be revised in accordance with the operation phase, and all personnel will be provided with the necessary training.

Dust suppression techniques such as the application of water or non-toxic chemicals should be used to minimize dust from vehicle movements. Necessary measures will be taken due to COVID-19 at the construction site, and sanitary and hygiene conditions will be provided. During the operation, the storage, use and disposal of hazardous materials will be strictly controlled in alignment with occupational health and safety, near-miss accidents, work permits, driving permits, height work permits, and environmental protection and good industrial practices.

Employees will receive adequate information about job descriptions, responsibilities and risks that may threaten occupational health and safety. Employees will be provided with the necessary personal protective equipment that meet national and international standards as well as information on work and occupational safety provided through regular training.

The Project Owner will perform necessary measures to prevent occupational accidents, injuries and diseases on site to the utmost extent, including actions to reduce and prevent the risk of exposure to harmful levels of ambient factors and chemicals, as well as the risk of injury or disease. The Project Owner will require all employees and contractors to adhere to local and international health and safety legislation and guidelines. This will include using suitable personal protective equipment (PPE) (safety helmets, ear protectors, protective gloves, etc.), implementing a management system for activities associated with health and safety risks, keeping available the permits for working at height, working in confined spaces, and driving vehicles, and adhering to these rules.

Lastly, the Occupational Health and Safety Plan, which includes the risk analysis, training plan, and response measures for the risks and impacts associated with the works to be conducted, in case of accident, sabotage, fire and electric shock, infectious diseases, earthquake, flood, storm and chemical spill, will be developed by the Project Owner and the Contractor, including the Emergency Preparedness and Response Plan (EPRP). This Occupational Health and Safety and EPRP will be prepared for construction and operation, at least three (3) months before the start of construction and operation and will be submitted to ILBANK and consequently to the WB.

6.17 Traffic and Transportation

Since there is no activity such as transportation of heavy items or construction crew that will create heavy traffic in the project area where the project will be carried out both during the construction and operation periods, no additional impact required special mitigation measures (such as new access road arrangements or arrangements at critical locations).

The times when the traffic density is low should be preferred for excavation trucks, and the necessary warning signs should be placed for the special link road. The personnel operating vehicles and heavy equipment will be dedicatedly assigned and that they will be provided with traffic and road safety training. The maintenance of the construction machinery and equipment will be carried out regularly and regulatory speed limitations will be followed for construction vehicles and this should be included in the construction site transport and traffic management plan to be prepared by the contractor.

Prior to construction activities, the Contractor will install all signs, barriers and control devices needed to ensure the safe use of the road by traffic and pedestrians, as required by the transport and traffic management plan to be prepared.

7 STAKEHOLDER MANAGEMENT UNDER ESMP

A stakeholder is defined as any individual, organization or group which is potentially affected by the Project or which has an interest in the Project and its impacts. The objective of stakeholder identification is to establish which stakeholders may be directly or indirectly affected – either positively or negatively - ("affected parties") or have an interest in the Project ("other interested parties").

Table 7-1 presents the interested and affected stakeholders within the scope of the Project.

Table 7-1. Stakeholder Groups

Stakeholder Groups	Stakeholder Type				Identification of stakeholders
	Type of Impact	Cause of Impact	Affected Party	Interested Party	
Internal Stakeholders					
• Odunpazarı Municipality Personnel • Contractors and Employees	Direct/Positive Impact	Project Development, Implementation and Employment	√		Employees who will ensure the realization of the project during construction and operation.
Government / Authorities					
• Eskisehir City Health Authority • Eskisehir Provincial Directorate of Family Labor and Social Services • Eskisehir Provincial Directorate of Environment, Urbanization and Climate Change • Eskisehir Metropolitan Municipality Coordination Center for the Disabled	Indirect/Positive Impact	Relation of the Project with Healthcare, Environmental and Social institutions during construction and operational phases		√	Local government authorities responsible for health, environment, social services and disabled people in Eskişehir province.
Private Education Institutions					
• Bulutay Special Education and Rehabilitation Center • Akonder Special Education and Rehabilitation Center • Ekin Basak Special Education	Indirect/Positive Impact	Relation of the Project with the activities intended for the disabled	√		Private institutions related to the education of people with disabilities

Stakeholder Groups	Stakeholder Type				Identification of stakeholders
	Type of Impact	Cause of Impact	Affected Party	Interested Party	
and Rehabilitation Center					
Associations / Non-Governmental Organizations					
• Bugday Tanesi Association for Reintegrating People with Intellectual Disabilities into the Community • Eskisehir Art and Sport Club Association for Physically Handicapped People • Anadolu University Educational Center for Children with Impaired Hearing (ICEM) • Turkey Disabled Association Eskisehir Branch Office	Indirect/Positive Impact	Relation of the Project with the activities intended for the disabled	√		NGO's for people with disabilities
Municipality					
• Odunpazarı Municipality	Direct/Positive Impact	Project Development, Implementation and Employment	√		Project owner
Neighborhood					
• Cankaya Neighborhood • Erenkoy Neighborhood • All neighborhoods to be served by this Rehabilitation Center	Direct /Negative Impact	Commissioning, Potential noise and dust emission during the construction phase	√		The area where the center will be established and the neighbourhoods where the stakeholders reside.

Stakeholder Groups	Stakeholder Type				Identification of stakeholders
	Type of Impact	Cause of Impact	Affected Party	Interested Party	
Vulnerable/Disadvantaged Groups					
• Households with physically and/or mentally disabled family members • People with chronic disease • Elderly people over 70 years of age who live alone and in need of care • Women • Female-headed households • Households where the head of the household is a child • Households with low or no income, and • Refugee households	Direct/Negative Impact	Commissioning, Potential noise and dust emission during the construction phase	√		Stakeholders with the potential for further harm if the project is affected by construction activities.

It is important that particular effort is made to identify any disadvantaged and vulnerable stakeholders who may be differentially or disproportionately affected by the Project or who may have difficulty participating in the engagement and development processes. Stakeholder identification is also an on-going process and will require regular review and update. The Stakeholder Engagement Plan (SEP) has been prepared for this project to identify project stakeholders and establish engagement methods for the future of the Project. Further details are given in the SEP.

Stakeholder engagement activities will be under the responsibility of a personnel from the Public Relations Unit who will be assigned for the implementation of SEP by the Project Owner or under the responsibility of a specifically assigned person with the qualifications required to perform the task. The Project Owner has ultimate responsibility for the implementation of this SEP. During construction and operational phases, the Project Owner will keep the information below up-to-date and accessible by providing information on the development of and practices under the Project.

- Key Project phases and schedules (e.g. obtaining permits, starting construction or operational activities, construction schedule, etc.),
- Any disruption related to the project (e.g. Road closures, access and infrastructure disruptions)

- Important consultations/meetings with potential consequences that may affect the community and local people, and
- Environmental, health and safety performance (e.g. Information about accidents, monitoring results).

7.1 Roles and Responsibilities

The Project will be awarded to a contractor by the tender, which will be lodged by the Project Owner and supervised by ILBANK. Responsible parties to take part in the organization management of the Project and their job descriptions are given in Table 2-1.

7.2 Announcements during the Construction Phase

The Project Owner will notify the headman's office located in the AoI two days in advance of any possible temporary road closure during construction works. Similarly, the Project Owner will inform the affected local people of the future works in the municipal building and/or on the notice platforms two days in advance.

Likewise, businesses, schools and/or hospitals that are potentially affected by construction activities will be notified of the works two days in advance, and activities will be driven by the feedback received from stakeholders so that businesses and/or services are not disrupted.

7.3 Further Stakeholder Engagement Activities

For all Category A and B subprojects proposed for the WB financing, the borrower consults sub project-affected groups and local non-governmental organizations about the sub project's environmental aspects and takes their views into account, during the Environmental Assessment process. The borrower initiates such consultations as early as possible. For Category B subprojects, at least one consultation with affected groups and other relevant/affected stakeholders is anticipated after the draft ESMP report is completed. An example of the Consultation Form prepared within the scope of the Project is given in Appendix-I.

This consultation information at this ESMP will include, but is not necessarily limited to, the following topics anticipated:

- Location of consultation(s);
- Date(s) of consultation(s);
- Details on attendees (as appropriate)
- Details on attendees (as appropriate)
- Meeting Program/Schedule: What is to be presented and by whom;
- Objective of the Project,

- Potential social and environmental impacts of the Project,
- Impacts and the mitigation or enhancement measures that are being implemented,
- Roles and responsibilities,
- Monitoring and management measures, and
- Information on the grievance redress mechanism for the Project.
- Summary of Meeting Minutes (Meeting details (date, location), Participants, concerns, Comments, Questions and Response by Presenters)
- Agreed actions.

Apart from that, the Project Owner will be responsible for consultations with stakeholders as an on-going process throughout the lifetime of the Project. Grievances can be an indication of growing stakeholder concerns (real and perceived) and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between projects, communities, and other stakeholders.

Internal and external stakeholders will be able to share their opinions and grievances via a range of options such as Project owner's web-site, White Desk (Beyaz Masa), phone line, ILBANK web-site, ILBANK'S mail address and phone line, CIMER and YIMER communication channels.

The grievance redress mechanism will be advertised and announced to affected stakeholders so that they are aware of the process, know they have the right to submit a grievance, and understand how the mechanism will work and how their grievance will be addressed, and service standards applied. In most cases, a grievance or complaint will be submitted by a stakeholder or local resident by phone, in writing, or by speaking with one of the Project Owner's grievances officers. Further information on the Project Owner's grievance redress mechanism is presented in Section 7.5.

7.4 Disclosure of Information and Stakeholder Engagement during the COVID-19 Process

The unprecedented nature of the COVID-19 Pandemic process implies that all elements of Project activities, including stakeholder engagement, may be affected. Given the compulsory restrictions and social distancing measures associated with COVID-19 may be required so, alternative approaches to stakeholder engagement emerged in the short term.

In efforts to disseminate information, the Project Owner will try to communicate reliable and accurate information to all stakeholders by ensuring that the information is in a form and language that are easily understandable and culturally appropriate.

It is recommended to use the following tools to interact with stakeholders during the pandemic period, provided that they are not limited to:

- Brochures
- E-mail
- Notice boards intended for the public. Notice boards will be located at project site, public areas/buildings that are free access for public.
- Phone interviews and messaging- Local radio, newspaper
- Project Owner's website

Additionally, changes in the operations of the Project Owner, which are caused by COVID-19 and which may have an impact on the public, will be reported accordingly. These include, but are not limited to:

- Changes in the project resulting from by COVID-19
- Changes in employment, procurement from local businesses, etc.
- Changes in timeframes to solve public grievances
- New or modified public awareness communication campaigns on COVID-19, which are coordinated with relevant authorities and based on the information from recognized sources such as the WHO.

Lastly, the Project will consider the new approaches presented in Table 7-2 to provide effective engagement during COVID-19. Moreover, further details are provided in Appendix-H.

Table 7-2. Alternative Information Disclosure and Stakeholder Engagement Measures during the COVID-19 Restrictions

Stakeholder Groups	Topics	Frequency	Methods and Materials	Lead and Supporting Responsibility
Government / Authorities • Eskişehir City Health Authority • Eskişehir Provincial Directorate of Family and Social Services • Eskişehir Provincial Directorate of Environment Urbanization and Climate Change • Eskişehir Coordination Center for the Disabled	• Updates on project activities and progress • Local procurement and employment data • Updates on social distancing restrictions and COVID-19 related measures	When necessary	Teleconference Virtual meetings Written up-to-date information Project Owner's website Grievance redress mechanism	Project Owner
Municipality • Odunpazarı Municipality	• Required updates on project activities and progress • Updates on social distancing restrictions and COVID-19 related measures	When necessary	Teleconference Virtual meetings Written up-to-date information Project Owner's website Grievance redress mechanism	Project Owner

Stakeholder Groups	Topics	Frequency	Methods and Materials	Lead and Supporting Responsibility
Neighborhood • Çankaya Neighborhood • Erenkoy Neighborhood • All neighborhoods to be served by this Rehabilitation Center	• Required updates on project activities and progress • Updates on social distancing restrictions and COVID-19 related measures	When necessary	Project Owner's websites Written up-to-date information Grievance redress mechanism Local Media	Project Owner
Associations / Non-Governmental Organizations • Buğday Tanesi Association for Reintegrating People with Intellectual Disabilities into the Community • Eskişehir Art and Sport Club Association for Physically Handicapped People • Anadolu University Education and Research Center for Hearing Impaired Children (ICEM) • Turkey Disabled Association Eskişehir Branch Office **Special Education Institutions** • Bulutay Special Education and Rehabilitation Center • Akonder Special Education and Rehabilitation Center • Ekin Basak Special Education and Rehabilitation Center	• Updates on project activities and progress • Updates on social distancing restrictions and COVID-19 related measures	When necessary	Virtual meetings Written up-to-date information Grievance redress mechanism	Project Owner
Internal Stakeholders • Odunpazarı Municipality • Municipality Personnel • Contractor Personnel	• Updates on the project progress and planning • Changes in project operational procedures and EPRP • Changes in occupational safety and labor conditions and (if any) guidance on access to subsidies • Measures to be taken in case of COVID-19 symptoms • Locations of centers specific to COVID-19 cases • Updates on new labor regulations regarding COVID-19 measures	When necessary	E-mail / SMS to be sent to all personnel Virtual meetings Teleconference Project Owner's websites Written up-to-date information	Project Owner Contractor

7.5 Grievance Redress Mechanism

The purpose of the Grievance Redress Mechanism is foremost to give access to a problem-solving procedure to Project affected people including affected communities and project workers. Grievances can be an indication of growing stakeholder concerns and can escalate if not identified and resolved. Identifying and responding to grievances supports the development of positive relationships between Project workers, local communities, and other stakeholders.

The structured Grievance Redress Mechanism will ensure that grievances associated with the Project are addressed through a transparent and impartial process. From the early stages of the Project lifecycle, the grievance procedure will be and will continue to be disclosed to the public through individual or group meetings, printed materials, notice board and Project Owner's website.

Currently, the Project Owner handles public grievances and views through the Public Desk and Barrier Free Contact Desk system. This municipal unit is established to receive grievances and requests from local citizens and intended to produce possible solutions within the municipality for reported concerns. While the Public Desk and Barrier Free Contact Desk system is not regarded as a Grievance Redress Mechanism, it is recognized as a general grievance system adopted by municipalities within their own organizations.

For this reason, it is anticipated that the existing grievance redress mechanism system for this Project can be maintained as the primary grievance redress mechanism, because the Project is already within the municipal organization.

Although the Public Desk and Barrier Free Contact Desk system can be used to collect the Project related grievances, a project specific central system will be established to compile the project related grievances in order to facilitate their tracking, analysis and monitoring and direct them to responsible personnel and/or unit for the resolution. Other grievances received by contractors, CİMER, YİMER, İLBANK, WB etc. will also be directed to this central system by the Municipality. Odunpazarı Municipality will be the common beneficiary of grievance redress mechanism under this Project for contractors and workers/employees.

Stakeholders will be able to communicate their grievances and views via the channels presented below:

- Odunpazarı Municipality Grievance Redress Mechanism Officer Contact Details
  - Name-Last Name: Cansu Uzun
  - E-mail: opetut@gmail.com
  - Telephone: +90 222 213 30 30/ Extension number 2251

- To Odunpazarı Municipality Public Desk center and/or by e-mail or telephone (halkmasasi@Odunpazarı.bel.tr , 444 26 00)
- By visiting the Barrier Free Contact Desk Center at Odunpazarı Municipality in person and/or by telephone at +90 222 213 30 30
- Grievance and request boxes to be installed in the Municipal building
- Grievance / notice boxes to be installed by contractors during the construction

During construction and operational activities, the grievance redress mechanism described above will continue to be driven by views of stakeholders, making this procedure accessible to all affected stakeholders. The Contractor will assign a responsible person to record the grievances received at the construction site verbally or through grievance forms that will be placed in the entrances of construction sites where local communities can easily reach. The responsible staff of Contractor will record all grievances that received at the construction site and convey to the Municipality's grievance mechanism officer for further actions and resolution.

The personnel to be assigned by the municipality will record any project related grievances and suggestion requests from different channels in a single established system, and will provide a solution within the time and implementation framework identified below.

The personnel to be assigned by the municipality will record all grievances that are:

- Communicated to the Project officials personally,
- Communicated by phone/e-mail,
- Dropped in grievance boxes to be installed in the Municipal Building and the Rehab Centre for Autistic and Disabled People Building,
- Conveyed by stakeholders who want to communicate based on the project documentation,
- From the personnel during the construction phase,
- From the operating personnel, and
- Communicated to contractors and inserted in a petition – in a single system and follow such grievances.

For this method to be successful, the Municipality personnel to be assigned will constantly be in contact with other municipality experts, contractors, and personnel who will be involved in the operation phase. Additionally, the job description of the Municipality personnel to be assigned will include the introduction of complaint mechanisms, which are publicly available and will be set up separately for employees, to relevant stakeholders.

Requests that require urgent remedy and/or support will be responded to and given support within the same day, and all outstanding grievances/requests will be recorded within two (2) business days, and reviewed and assessed within ten (10) business days, and concluded not later than 15 business days. Subsequently, the necessary corrective actions will be taken to resolve the grievance. The suitable resolution for the complaint will be accordingly communicated to the complainant within the two (2) working days of completing the grievance investigation phase.

If stakeholders fail to reach a satisfactory solution through the channels provided above, they will be able to reach ILBANK's communication channels listed below, the Presidency's Communication Centre (CİMER), the Foreigners Communication Center (YİMER) and the relevant legal institutions.

ILBANK's Communication Channels:

- ILBANK Website (https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi)
- ILBANK Contact number for Complaints, Wishes, Suggestions +90 312 508 7979
- ILBANK E-mail (bilgiuidb@ilbank.gov.tr)
- ILBANK Address for Petition Service (ILBANK International Relations Department, Grievance Redress Mechanism Team – Emniyet Mahallesi Hipodrom Caddesi No 9/21 Yenimahalle/Ankara)

Presidency's Communication Center (CİMER):

- CİMER Website (www.cimer.gov.tr)
- CİMER Call Center (150)
- CİMER Phone Number: +90 312 525 55 55 - Fax Number: +90 312 473 64 94
- Mail addressed to Republic of Turkey, Directorate of Communications
- Individual applications at the community relations desks at governorates, ministries and district governorates

Foreigners Communication Center: The Foreigners Communication Center (YİMER) has been providing a centralized complaint system for foreigners:

- YİMER Website (www.yimer.gov.tr)
- YİMER Call Center (157)
- YİMER Phone Number: +90 312 5157 11 22 - Fax Number: +90 312 920 06 09
- Mail addressed to Republic of Turkey, Directorate of Communications

- Individual applications at the Republic of Turkey General Directorate of Migration Management

Applicants whose complaints could not been resolved through existing grievance redress mechanism or whose complaints contain sensitive issues can always apply to the relevant legal institutions. Relevant Institutions can be summarized as, but not limited to, as follows.

- Civil Courts of First Instance,
- Administrative Court,
- Commercial Courts of First Instance
- Labor Courts, and
- Ombudsman (https://ebasvuru.ombudsman.gov.tr/)

Since there are special procedures/principles for handling sensitive content grievances (Sexual exploitation and abuse/sexual harassment and gender based violence in the workplace or potential child abuse in project areas), these grievances will be handled centrally at ILBANK, not at the Project Owner or Contractor level.[15] In case such a complaint about SEA/SH is received by the contractor or the project owner, they will be responsible for conveying the issue directly to the ILBANK GRM focal point on SEA/SH issues. However, contractor and Project Owner should still be trained and informed about the principles applicable to SEA/SH cases.

- ILBANK Website (https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi)
- ILBANK E-mail (etikuidb@ilbank.gov.tr)
- ILBANK Address for Petition Service (ILBANK International Relations Department, Grievance Redress Mechanism Team - Emniyet Mahallesi Hipodrom Caddesi No:9/21 Yenimahalle/Ankara)

The Municipality official who will manage the Grievance Redress Mechanism will be knowledgeable about the guidelines prepared by the WB to prevent sexual exploitation, abuse and harassment cases for the projects financed under construction works. Grievances of gender-based violence, exploitation and harassment can result in a culture of silence due to negative reactions from the community. To avoid this, it is highly important that the stakeholders can raise the grievances involving these issues about the Project anonymously. In addition, the authorities handling the grievances should address such issues within confidentiality and by an unbiased approach[16].

[15] https://ewsdata.rightsindevelopment.org/files/documents/12/WB-P170612_7nHpF6X.pdf

[16] https://thedocs.worldbank.org/en/doc/741681582580194727-0290022020/original/ESFGoodPracticeNoteonGBVinMajorCivilWorksv2.pdf

In addition, the project GRM will include a channel to receive and address confidential complaints related with Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) and gender based violence (GBV) with special measures in place. If an employee faces SEA/SH issue s/he can either apply to a higher-level superior or directly go to police station, as stipulated in the national referral system of the country for dealing such cases. The content and procedures of the project's GRM will also have a reporting line on such cases in regard to SEA/SH and GBV issues and will be handled under full confidentiality. PIU receiving the SEA/SH and GBV related grievance should direct this to national referral systems immediately and record that this has been directed, as set out in the GRM Procedure of ILBANK. All details of the complainant of the sensitive case will be kept strictly confidential.

All stakeholders who have lodged a grievance may request that their applications be assessed in confidence. The Project Owner will ensure that the name and contact details of the complainant are not disclosed without their consent.

Stakeholders identified during the design phase of a project may change during implementation and the SEP needs to be updated accordingly. Therefore, the SEP document of the Project will be updated when deemed necessary according to the consultation meetings to be held, the grievance records communicated to all mechanisms related to the Project, and the determinations made in the 6-month project progress reports.

To provide a framework for the Grievance Redress Mechanism to be established, this subsection presents information about the data that should be included in the grievance registration procedure.

As part of the central Grievance Redress Mechanism to be established, all grievances received within the scope of the Project will be recorded by the Project Owner in the Grievance Log with a reference number assigned and reported quarterly during the monitoring period, including the content of the grievances and the corrective action taken against the grievance. In addition, records of all participation activities carried out within the scope of the Project will be kept and submitted to ILBANK quarterly in the content of ESMRs. Further details are given in the SEP. In addition, the Grievance Log will be used to monitor the status of the grievance, determine the frequency of occurrence of the grievance, analyze the reasons for the grievance, and identify common grievances and recurring trends. The Grievance Log is presented in

Table 7-3.

Table 7-3. Grievance Log

No	Grievance Registration Number	Receiving the Grievance (Grievance Redress Mechanism Form, Community Meeting, Phone)	The level of Grievance (Municipal/Administrative Level, İller Bank Regional Office, İller Bank Headquarters Level)	The date of receiving the grievance	The Location of receiving the grievance	The name of person who received the grievance	The Land Parcel (If the grievance is related to land)	Complainant's information					Grievance Related Project Component	Grievance Category (related to expropriation/land acquisition, environmental issues, damage to structures, etc.)	The Summary of the grievance	The Status of the grievance (open, close or waiting)	Taken Measures				Supporting Documents for Grievance Closing (bank receipt for compensation, Grievance closing protocol)
								Name/ Surname	ID No	Phone/ E-Mail	Neighborhood	Gender					Responsible person/ department	Planned measure	Deadline for Grievance Handling	Measured Date	
1																					

Source: ILBANK Grievance Register Table

Samples of the grievance form and grievance closure form prepared for use within the scope of the Project are given in Appendix-J and K.

7.5.1 Public Grievance Redress Mechanism

Grievances should be reviewed as soon as possible to give priority to resolution. Regardless of general response and resolution times, some important grievances may require immediate action, such as an urgent safety issue or issues affecting public health.

There are 6 steps that supplement the Public Grievance Redress Mechanism. This process is described by the steps provided in Table 7-4.

Table 7-4. Public Grievance Redress Mechanism

Steps	Scope	Details
1. Step	**Identify grievances**	Regardless of general response and resolution times, some important grievances may require immediate action, for example an urgent safety issue or issues regarding local people's livelihoods.
2. Steps	**Record grievances in the system**	After determining the urgency level of the grievances, it will be ensured that the grievances are recorded.
3. Steps	**Determine specific actions for grievances and report them to relevant units / supervisors for resolution**	Requests that require urgent support will be responded to and given support within the same day, and all outstanding grievances/requests will be approved within 2 business days, and responded to within 10 business days, and concluded not later than 15 business days. The suitable resolution for the complaint will be accordingly communicated to the complainant within the 2 working days of completing the grievance investigation phase.
4. Steps	**Develop a response to grievances**	A response will be developed by the delegated team within 15 days with input from relevant units and supervisors, excluding complaints involving emergencies. The response should identify a suitable resolution to the grievance, which could involve further information to clarify a situation, taking measures to mitigate problems.
5. Steps	**Communicate the response developed for grievances**	The official appointed for the Project grievance handling will adopt and implement the most adequate approach to the communication of the relevant response. The response will also contain an explanation of how the person that raised the grievance can proceed with the grievance in case the outcome is not satisfactory. In case the grievance is raised anonymously, a summary of the grievance and resolution should be posted on the municipality's website and on notice boards located around the Rehab Centre for Autistic and Disabled People building as well as in the headman's offices in the settlements that are anticipated to be affected. In addition, the neighborhood headmen should be contacted regarding anonymous grievances and resolutions.
6. Steps	**Close grievances**	Based on the potential effects of the grievance, the complainant can be allowed time to respond and the complainant's response will be recorded, to help assess whether the grievance is closed or whether further action is required. Final approval will be provided after the relevant Project officials assess whether the grievance can be closed. Closed grievance files will be recorded in a systematic way, and will be submitted to the authorities during third party inspections when necessary.

In case the grievance is raised anonymously, a summary of the grievance and resolution should be posted on the Municipality's website and on notice boards located around rehabilitation center as well as in the headman's offices in the settlements that are anticipated to be affected.

7.5.2 Worker Grievance Redress Mechanism

Worker Grievance Redress Mechanism is defined as grievances from Project employees (including both direct and indirect employees). This mechanism is structured to make it an effective approach for early identification, assessment, and resolution of grievances throughout the lifetime of the Project. The Grievance Redress Mechanism should guarantee that any employee raising a grievance will not be subject to any retaliation.

The scope of the Worker Grievance Redress Mechanism can be summarized as follows, but not limited to; occupational health and safety, labor conditions, wages, problems with the local community or co-workers, hygiene problems in common areas, insufficient food and/or worker safety, etc.

The Grievance Redress Mechanism will be informed to all project workers through written and verbal communications. Each worker should be informed about the grievance redress mechanism at the time they are hired, and details about how it operates should be easily available, in employee handbooks for example.

Confidentiality is highly important for some workers; therefore, workers can raise grievances anonymously. However, grievances lodged anonymously may prevent the expert, who is appointed by the Project Owner for grievances, from resolving the issue and giving feedback. Nevertheless, Project workers wishing to lodge grievances anonymously should be allowed to do so.

Requests that require urgent remedy and/or support will be responded to and given support within the same day, and all outstanding grievances/requests will be recorded within two (2) business days, and reviewed and assessed within ten (10) business days, and concluded not later than 15 business days. Subsequently, the necessary corrective actions will be taken to resolve the grievance. The suitable resolution for the complaint will be accordingly communicated to the complainant within the two (2) working days of completing the grievance investigation phase.

In case the complaint is assessed to be out of the scope of the Project's Grievance Redress Mechanism, the complainant should be notified through the desired communication method and an alternative mode of solutions should be suggested.

The assigned Municipality/Contractor official will open the grievance boxes within the scope of the Project every five (5) days and will make an assessment to determine whether the issues

reported in writing fall within the scope of Worker Grievance Redress Mechanism. The resolution process of anonymous grievances and other related notices may be announced in writing in common areas available to workers.

Grievances should be reviewed as soon as possible to give priority to resolution. Regardless of general response and resolution times, some important grievances may require immediate action, for example issues regarding workers' livelihoods.

There are five (5) steps that supplement the Worker Grievance Redress Mechanism. This process is described by the steps provided in Table 7-5.

Table 7-5. Worker Grievance Redress Mechanism

Steps	Scope	Details
1. Step	**Identify grievances**	The grievance will be raised through the Municipality/Contractor official to be assigned. This could be in person, by phone, letter, grievance boxes or email.
2. Steps	**Record grievances in the system**	Once the grievance is received and recorded, the Contractor/Municipality official to be assigned based on the subject and issue will identify the department, management or personnel responsible for resolving the grievance.
3. Step	**Follow up grievances**	The Contractor/Municipality official to be assigned and the relevant units should assess the facts relating to the grievance. This should be aimed at establishing and analyzing the cause of the grievance and identifying suitable mitigation measures. The analysis of the cause will involve assessing various aspects of the grievance, such as the background of the employee, frequency of the complaint occurrence, managerial practices, recent incidents in the workplace, etc. When needed, the Municipality/Contractor official to be assigned may also undertake confidential discussions with the concerned parties to develop a more detailed understanding of the issue at hand. A site visit may be deemed necessary to gain first-hand understanding of the nature of the complaint and to verify the validity and severity of the grievance. After the details of the grievance are escalated to the relevant management unit, the said grievance will be discussed jointly by the employee and the regional and/or line manager. The investigation phase should be completed not later than 15 business days of the grievance receipt.
4. Step	**Resolve and close grievances**	This is concluded based on the process developed in consultation between the assigned Municipality/Contractor official and the related departments or management. The suitable remedy for the grievance should be communicated to the complainant within 15 business days of the completion of grievance investigation phase. If the grievance is beyond the duty of the assigned Municipality/Contractor official, the grievance should be escalated to the Project Management Unit to so that it can be resolved at managerial levels within seven (7) business days of the escalation.
5. Step	**Close Grievances**	The assigned Municipality/Contractor official, having received the necessary signatures, will close the grievance once the grievance is resolved and the result is communicated to the complainant. The current status of the grievance and the details regarding how the grievance is resolved will be recorded in the Grievance Log. The purpose of recording further information in the grievance log is to provide a baseline for any similar grievances that may arise in the future. If the grievance is raised anonymously, a summary of the grievance and resolution should be posted on the Municipality's website and on notice boards located in

Steps	Scope	Details
		common areas of the facility, and should be announced through tool-box or weekly meetings.

8 ENVIRONMENTAL AND SOCIAL ASPECTS, AND BEST PRACTICE MITIGATION MEASURES

The activities to be performed in the scope of the Project are presented in Table 8-1 and considered for the assessment of the best practice mitigation measures defined for the Project.

The activities to be carried out within the scope of the Project will be in compliance with the most up-to-date national legislation and WB standards. Where Turkish legislation differs from WB Policies, the stricter one will be applied for the implementation of the Project.

The mitigation plans prepared for the construction and operation phases are presented in Section 8.1 and Section 8.2, respectively. Activities to be performed in the scope of the Project are presented in Table 8-1.

Table 8-1. Activities to be performed in the Scope of the Project

ENVIRONMENTAL/SOCIAL REVIEW			
	Activity	**Status**	
Activities to be carried out as part of on-site works	A. Building improvement	[ ] Yes	[X] No
	B. New minor construction works	[X] Yes	[ ] No
	C. Individual wastewater treatment system	[ ] Yes	[X] No
	D. Historical building(s) and sites	[ ] Yes	[X] No
	E. Land acquisition[17]	[ ] Yes	[X] No
	F. Hazardous or toxic materials[18]	[ ] Yes	[X] No
	G. Impacts on forestlands and/or protected areas	[ ] Yes	[X] No
	H. Medical waste collection / management	[X] Yes	[ ] No
	İ. Traffic and Pedestrian Safety	[X] Yes	[ ] No

[17] Land acquisition covers displacement of people, change in livelihoods, and seizure of private properties. This applies to acquired/assigned lands, and affects the residents and/or slum dwellers and business owners on the lands acquired in the said way.

[18] Toxic/hazardous materials include asbestos, toxic paints, harmful solvents, lead paint removal, etc.

8.1 Mitigation Plan for the Construction Phase of the Project

No.	Topic	Definition of Potential Impact	Type of Impact	Impact Significance Before Mitigation	Cost	Measures to be Taken	Responsibility	Key Performance Indicators
C1	Disclosure	Insufficient information	Adverse	Low	Included in construction costs	▪ Before the start of construction works, the local people and all relevant stakeholders will be informed of the works to be performed and the measures to be taken. ▪ The information on the start and finish dates of construction and working periods and the permits obtained from the provincial/district municipality will be shown by the operations owner in a signboard that is easily visible to all personnel at the construction site.	Contractor Project Owner	▪ Number of grievances ▪ Percentage of closed grievances within the target timeframe
C2	Occupational Health and Safety (OHS)	Inadequate workers health and safety conditions	Adverse	High	Included in construction costs	▪ The Project management unit to be formed by the Project owner and the contractor's project team will include staff(s) (at least one environmental and one social expert and one full time OHS expert) who will take part in full-time and effectively control the implementation of the Project. And, Project Owner will make sure that the measures provided below are taken by the contractor, and enforce necessary actions/sanctions in case lack of these measures on site. ▪ To control the cases (fire, earthquake, etc.) which may occur during the construction activities under the project and which require urgent action, an EPRP and an OHS Plan will be prepared and shared with all employees. ▪ The Project Owner will require all employees and contractors to adhere to local and international health and safety legislation and guidelines. Workers will be provided with all necessary personal protective equipment (PPE) (hard hats, safety harnesses, protective coveralls, glasses, gloves, armor-clad shoes, etc.). ▪ Non-smoking areas will be allocated at the construction site. ▪ Appropriate hand and face washing facilities will be provided to the employees, and also shower facilities for dusty works. ▪ Technical and OHS training, including the code of conduct indicating the possible risks regarding the work site and works to be carried will be given to workers by the contractor. These will include regular trainings to workers on COVID-19 symptoms, how to be protected and what to do when symptoms appear. Training will also be given on risks that may arise due to changes in workplace or job, change of work equipment, application of new technology. Information and training activities will be carried out not only for the employees, but also about the measures to be taken for community health and safety. ▪ All employees will be informed about working conditions, job definitions, responsibilities, relations with the local community and potential work risks. ▪ Workers will be required to comply with all OHS regulations given in Table 3-1 and necessary inspections will be made. ▪ The contractor formally agrees that all work will be carried out in a safe and disciplined manner and is designed to minimize risks on neighboring residents and environment. ▪ All activities will be implemented in line with both the Law on Occupational Health and Safety and its relevant regulations which presented in Table 3-1, and also the WBG EHS Guidelines. ▪ The contractor will ensure a safe working environment for the workers in line with international best practice and Turkish Legislation including the health and safety measures related to COVID-19 provided by the Ministry of Health and Ministry of Family, Labor and Social Services. ▪ The contractor will assign full-time personnel with relevant certification and experience in charge of OHS and she/he shall monitor the site implementations. ▪ Before the construction works start, a Risk Assessment study will be implemented for all works to be carried out. EPRP will be prepared and put into practice. Both the Risk assessment and EPRP will take into consider the COVID-19 risks and other communicable disease risks, as relevant. ▪ Emergency teams will be formed, and drills and training programs will be carried out in line with emergency scenarios. ▪ Employees will have a good command of emergency plans, and the grievance will be reported to the authorized teams and resolved, if they require urgent action. ▪ Project and site-specific OHS Management Plan based on construction site OHS risk assessment and that will also cover measures to address COVID-19 and/or any other pandemic/communicable disease risk, which will be in line with the WBG EHS Guidelines (both general and sector specific) should be developed before the commencement of works and implemented on site.	Contractor Project Owner	▪ % of scheduled HSE Inspection ▪ % of attendance at HSE meetings ▪ % of closing of Non Compliance Reports (NCRs) ▪ Reporting safe observations ▪ Reporting unsafe observations ▪ Reporting near misses ▪ % of Toolbox attending ▪ % of Risk Assessment compliance ▪ % of Legal Requirements compliance ▪ Results of scheduled audits ▪ HSE training carried out to training matrix ▪ > 90% of all training to matrix ▪ % of attendance at scheduled trainings ▪ Engagement in HSE program by individual managers and supervisors ▪ Engagement in HSE program by contractor's

No.	Topic	Definition of Potential Impact	Type of Impact	Impact Significance Before Mitigation	Cost	Measures to be Taken	Responsibility	Key Performance Indicators
						▪ Appropriate signposting of the sites will be provided and then workers will be informed of key rules and regulations to follow. ▪ OHS trainings and toolbox talks will be provided to the employees including the code of conduct indicating the possible risks regarding the work site and works to be carried out. These will include regular trainings to workers on COVID-19 symptoms, how to be protected and what to do when symptoms appear. ▪ First aid kit will be kept available at the construction site, taking into account that first aid response may be required before the casualty is referred to the nearest healthcare provider. ▪ Both trainings and incidents (fatalities, lost time incidents, any significant events including spills, fire, outbreak of pandemic or communicable diseases, social unrest, etc.) will be recorded. ▪ In the event of any significant incident (e.g. environmental, social, labor or lost-time incidents) the Contractor shall immediately notify Odunpazarı municipality shall inform ILBANK and WB within three business days. Then, within 30 days, a report on the root causes of the incident and the corrective actions to be taken will be presented to ILBANK and WB. ▪ Guidance, directives and recommendations of Ministry of Health, Ministry of Family, Labor and Social Services, WHO and the WB shall be followed and all relevant necessary measures shall be taken, both for occupational health and safety of employees and for workplaces, in case of an outbreak of any other pandemic/communicable disease including COVID-19. ▪ Areas where excavation work is to be carried out will not be accessible other than the authorized personnel. The loading and unloading activities shall be carried out together with the persons to oversee the personnel to carry out the activity. ▪ Since the works will be performed at areas close to the public, the public access to these areas shall be restricted by any means. If a trench needed to be left open for night, the sufficient illumination of the area shall be ensured by the Contractor and necessary signs shall be placed, and the area shall be enclosed with barriers. ▪ Installation of concrete molds, concreting, installation of water tank etc. may require working at height, working in confined space etc. Therefore relevant procedures such as Confined Space Entry Procedure, Working at Height Procedure, etc. will be prepared in accordance with applicable national requirements and internationally accepted standards. ▪ Adequate and appropriate training in confined space hazard control, atmospheric testing, use of required PPE as well as the serviceability and integrity of PPE shall be verified before workers are required to enter a permitting confined space. In addition, adequate and appropriate rescue and/or rescue plans and equipment shall be in place before the worker enters the confined space. In the event of an accident, coordination will be established with the emergency response teams to ensure that the most accurate first aid is given. The Emergency Action Plan will be revised in accordance with the operational period and necessary training will be given to all personnel. ▪ Only personnel holding the height work permit will work at height, and safeguarding measures (guardrails, fall arrest) will be in place. ▪ The areas to be excavated will not be accessible except by authorized personnel. Loading and unloading activities will be carried out together with the persons who will supervise the personnel who will carry out the activity. ▪ The construction areas will be surrounded and necessary security measures will be taken, no one will be allowed to enter except for the staff. ▪ The WBG General Environment, Health and Safety Guidelines will apply. ▪ Equipment that meets international standards in terms of performance and safety will be used. ▪ All equipment used during the construction phase will be kept in good working condition. ▪ The contractor will assign a full-time staff responsible for OHS with relevant certification and experience and monitor field practices.		
C3	**Employment / Economy**	Child labour, forced labour and unregistered employment Contribution to economy	Adverse	Low	Included in construction costs	▪ Care will be taken to contributing to the local economy through the use of local materials and to procuring various goods and services from local resources. ▪ Priority should be given to the local labor where possible and practical. ▪ Efforts will be exercised to allocate employment opportunities to the local parties and the settlements within the AoI.	Contractor Project Owner	▪ Number of grievances ▪ Percentage of closed grievances within the target timeframe

No.	Topic	Definition of Potential Impact	Type of Impact	Impact Significance Before Mitigation	Cost	Measures to be Taken	Responsibility	Key Performance Indicators
						▪ The work permits of the employees will be controlled within the scope of the Project, prohibiting child labor, forced labor, and child labor under the age of 18. ▪ Discrimination in the workplace will be eliminated. ▪ Necessary measures will be taken by contractor to make sure that workers coming from outside the city will be given a training program on dialogue and communication with local communities, and that there are no social or cultural issues between host communities and external workers. It is the Project Owner's responsibility to ensure that the contractor complies with the determined criteria.		
C4	**Social Life**	Potential Community Disturbance	Adverse	Low	Included in construction costs	▪ The Contractor will provide training to the site personnel on environmental and social issues. It is the Project owner's responsibility to ensure that the contractor complies with the determined criteria. ▪ The operations to be carried out during construction works will be performed not to restrict / hinder the social and economic life of local people. ▪ To avoid any impact on the safety and daily life of communities, safety and information signs will be placed on site before the work. ▪ The public, and nearby institutions and organizations, and hospitals and schools will be informed at least two days before starting repair / maintenance works that may cause disturbance temporarily. ▪ The construction activities to be performed around or in front of hospitals and/or healthcare providers will be planned not to hinder the public access to these services and the opinions of the relevant stakeholders will be sought in order to determine the common working strategy in this regard ▪ The Project Owner will ensure that contractors establish the code of conduct and will check that workers will be given training especially on communication with local people of foreign nationality public before starting work, so that local people of foreign nationality will not be adversely affected by external workers.	Contractor Project Owner	▪ Number of grievances ▪ Percentage of closed grievances within the target timeframe
C5	**Labor Conditions**	Improper Working Conditions, Child labor, forced labor and unregistered employment	Adverse	Low	Included in construction costs	▪ Workers will be allowed to have access to the Grievance Redress Mechanism and will be required to be aware about this Mechanism. ▪ All workers will be given training on discrimination and codes of conduct. The trainings given to the employees will be explanatory about the concepts of sexual harassment and abuse, gender-based violence, abuse and intervention with harassment. At the same time, through the trainings, it will be ensured that workers learn the Grievance Redress Mechanism of the Project (explained in detail in the Project's SEP document) and the steps to be followed in exercising their legal rights. Access to the Grievance Redress Mechanism will be easy and effective. The grievance redress mechanism officer (Cansu Uzun) designated for the Project will be announced to all employees during the trainings to be given before starting work. There will be brochures and posters containing the grievance redress mechanism and the contact information of the authorized person in places such as the cafeteria, canteen and service areas used by the employees. ▪ Minimum legal labor standards will be met (child/forced labor, anti-discrimination, working hours, minimum wages) as per International Labor Organization (ILO) regulations. ▪ At the same time, the Operational Policies of the World Bank given in Chapter 3 and the national legislation given in Table 3-1 will be complied with in terms of the working conditions. ▪ Workers will be provided hygienic and adequate facilities. ▪ Workers will be allowed to have access to primary healthcare on site, enabling the provision of prescriptions. ▪ Discrimination based on language, race, gender, political thought, philosophical belief and religion will be avoided in business relations.	Contractor Project Owner	▪ Number of grievances ▪ Percentage of closed grievances within the target timeframe
C6	**Community Health and Safety**	Community health and safety risks	Adverse	High	Included in construction costs	▪ To minimize the impact of the traffic activities that are expected to intensify during the construction phase, the working hours will be adjusted according to the peak hours of transportation. ▪ Special crossings will be created by taking additional measures for the elderly, pregnant women, people with small children and the disabled. ▪ The project area will be fenced to avoid physical hazards to the communities associated with the project. ▪ Contractors will take necessary health and safety measures, such as using appropriate warning signs and signboards, arranging time schedule of noisy works (mostly after 9:00 AM before 6 PM), making the regular maintenance of the machinery, replacement or repair of part which cause noise and performing watering in dry seasons, under the management	Contractor Project Owner	▪ Number of communicable and non-communicable diseases and injuries experienced. ▪ Number of community health safety & security complaints from local communities as recorded in the grievance register.

No.	Topic	Definition of Potential Impact	Type of Impact	Impact Significance Before Mitigation	Cost	Measures to be Taken	Responsibility	Key Performance Indicators
						of the Project Owner during site preparation and construction activities so that the public is informed of the construction plan and locations in a timely manner and the construction sites are determined. ▪ Care will be taken to ensure that warning signs are visible at night and in bad weather conditions. ▪ The adequate number of appropriate firefighting equipment will be kept available at construction sites at all times. ▪ An emergency action plan will be prepared and implemented in order to be able to take and manage measures to protect public health and safety. Project employees, local people and response teams will be informed about this plan. ▪ Local people will be informed about possible dangers and precautions to be taken with brochures that will be placed on signs and notice boards to be hung in various areas in the neighborhood. ▪ Detailed information on the use of the Grievance Redress Mechanism and contact information on the grievance redress mechanism officer will be made available to the public. (via the project website, information brochures left at the Mukhtars offices, posters and hand brochures in places such as schools, health centers, hospitals, mosques, which are the common areas used by the community intensively). ▪ Damages that may occur on the road surfaces due to traffic caused by heavy construction machinery during construction works on existing roads will be repaired by the contractor. In case of any damage to infrastructure elements on private lands due to construction activities, mitigation measures will be taken by the contractor.		▪ Number of reported community health & safety incidents ▪ Number of reported noise incidents
C7	**Land Use**	Damages to adjacent lands and structures	Adverse	Low	Included in construction costs	▪ Any unintended damages caused to adjacent land and structures during construction will be compensated and repaired by Project Owner/Contractor. ▪ If grievances are received regarding unauthorized use of privately-owned lands, damage to neighboring lands, etc. through the Grievance Redress Mechanism to be established, assessments / investigations will be performed on a case-by-case basis, and corrective actions will be planned and implemented, where necessary. ▪ Materials will be stored in closed and protected areas. ▪ If it is required to provide an additional space for closed and protected areas, the contractor will fulfill temporary rental formalities or obtain relevant permits.	Contractor Project Owner	▪ Number of grievances ▪ Percentage of closed grievances within the target timeframe
C8	**Stakeholder Engagement**	Communication issues with the stakeholders	Adverse	Low	Included in construction costs	▪ An adequate timing will be planned for interaction / communication with communities and for engagement. ▪ Regular consultations will be carried out with the authorities and communities regarding the project management. ▪ Comprehensive information on the stakeholder engagement is provided in SEP of the Project and the SEP will be updated and implemented throughout the Project.	Contractor Project Owner	▪ Number of grievances ▪ Percentage of closed grievances within the target timeframe ▪ Records of stakeholder engagement activities
C9	**Grievance Redress Mechanism**	Grievance Issues	Adverse	Low	Included in construction costs	▪ An efficient Grievance Redress Mechanism will be initiated to allow potentially affected individuals to voice their concerns on the Project.	Contractor Project Owner	▪ Number of grievances ▪ Percentage of closed grievances within the target timeframe
C10	**Documentation**	Missing documentation	Adverse	Low	Included in construction costs	▪ All activities, information meetings, opinions/suggestions, grievances, etc. provided during the construction period will be documented continuously	Contractor Project Owner	N/A
C11	**Sustainable Development Goals**[19]	Failure to set sustainable goals	Adverse	Low	Included in construction costs	▪ Throughout the life of the project, workers will be recruited from the region as much as possible. ▪ Throughout the life of the project, priority will be given to working with local suppliers and procuring services from the local employees in the service industry, as much as possible (fuel supply, vehicle maintenance/food, beverage and spare parts supply, etc.).	Contractor Project Owner	N/A
C12	**Traffic and Pedestrian Safety**	Direct and indirect threats posed by construction activities against traffic and pedestrians	Adverse	High	Included in construction costs	▪ Actions will be taken to ensure that any vehicles operating during the construction period obey the set speed limit (30 km/hr). ▪ Traffic and warning signs will be placed around and near the project area. ▪ The project area will be made visible. ▪ Local people will be informed about potential hazards and risks through brochures and posters left in common areas frequently used by local people such as headman's offices, hospital, health center, mosque, coffee house and marketplace.	Contractor Project Owner	▪ Number of non-compliances against the mitigation controls identified in Traffic Management Plan ▪ Number of drivers found to be exceeding

[19] As mentioned in the United Nations Development Cooperation Strategy Turkey 2016-2020 Government of The Republic of Turkey and The United Nations System in Turkey, *Sustainable, Inclusive Growth and Development Goals*.

No.	Topic	Definition of Potential Impact	Type of Impact	Impact Significance Before Mitigation	Cost	Measures to be Taken	Responsibility	Key Performance Indicators
						▪ The activities affecting the local traffic will be planned considering the rush hours of the traffic as much as possible. ▪ All drivers involved in the project will be informed about road safety, speed limits, and traffic rules to be followed during the project, and requirements to be observed. ▪ The weight of all vehicles will not exceed the legal limits according To Highway Traffic Regulation which given in Table 3-1. ▪ In case of hazardous chemical or waste storage on site, the transfer of these wastes will be performed out by licensed carriers not to pose a threat to community health. ▪ The routes developed in agreement with the competent authorities will be used for special cargos. The designated routes will be programmed to prevent traffic congestion on the roads, and will be published in advance to prevent possible disturbance. ▪ The arrangements in traffic will be discussed with the Municipality and planned jointly. ▪ To prevent unauthorized access to the construction site, the construction site will be surrounded by fence/curtain/protection tape, and uncontrolled entrances will be prevented.		speed limits or driving unsafely ▪ Number of road traffic accidents involving: ▪ Accidental injuries and deaths, ▪ Spillages (such as cargo or fuel), ▪ Wildlife-vehicle collisions. ▪ Number of traffic-related grievances
C13	**Air Quality**	Air pollution from Construction Works	Adverse	Low	Included in construction costs	▪ Dust from outdoor sources will be minimized by employing control measures such as covering the piles and increasing the moisture content. ▪ Dust suppression techniques such as the application of water or non-toxic chemicals will be used to minimize dust from vehicle movements. ▪ Truck loading and unloading operations will be carried out with due care, and materials will be prevented from scattering around. ▪ Modern equipment and vehicles that can meet the applicable emission standards will be selected for construction works. ▪ All vehicles will have exhaust emission permits and all vehicles will be regularly maintained. ▪ Exhaust systems and emission levels of machinery and vehicles will be checked by the contractor. ▪ Project Grievance Redress Mechanism will be implemented. ▪ In case of any complaints, air quality measurement will be carried out at the nearest sensitive receptors in accordance with international standards, and the results will be recorded. ▪ Speed limits will be set for construction equipment, and actions will be taken to ensure that such limits are complied with. ▪ During transportation, excavated materials will be covered with nylon canvas or materials with grain size larger than 10 mm ▪ Any damage caused by inadequate dust suppression measures (i.e. pollution of the surrounding area, transport to a residential area by wind, dust deposits by the wind, etc.) will be compensated by the contractor.	Contractor Project Owner	▪ Air Quality incidents ▪ Records of Non-Compliance with air quality standards ▪ Community complaints
C14	**Noise**	Noise from Construction Works	Adverse	Low	Included in construction costs	▪ Residents living near the project area will be informed during the construction phase. ▪ Construction works will be planned in consultation with local communities, and operations with the highest noise generation potential will be scheduled during the time of the day that will cause minimum disturbance. ▪ Noise control devices, such as temporary noise barriers and deflectors, will be used for operations causing impact as well as exhaust silencers for combustion engines. ▪ Use of roads close to the settlements in transportation activities for the project will be avoided or minimized. ▪ Equipment and vehicles used externally will be regularly maintained. ▪ "Low noise" equipment will be used as much as possible during the construction phase. Where construction equipment is provided with impermeable acoustic covers or enclosures, covers will be kept closed while equipment is in operation. ▪ When equipment is not working, they will be turned off or reduced to the minimum level. ▪ Vibration levels will be monitored in case of complaints, and measures will be taken to reduce vibration if standards are exceeded. ▪ Noise measurement will be carried out at the nearest noise sensitive receptors in accordance with the international standard, in case of any complaints.	Project Owner Contractor	▪ Noise and Vibration incidents ▪ Records of Non-Compliance with Project standards ▪ Number of noise-related community grievances
C15	**Waste Management**	Wastes of Construction Works	Adverse	Medium	Included in construction costs	▪ During the construction period, any waste will be collected separately at source, and stored in the temporary waste storage area. ▪ Top soil will be separated from general trash and organic, liquid and chemical wastes on site, and stored in appropriate containers. ▪ Construction waste will be regularly collected by licensed collectors at the permitted excavation waste storage site of the Municipality.	Project Owner Contractor	▪ Total waste generated ▪ Ratio of recovered/reused/ recycled waste to total waste generated

No.	Topic	Definition of Potential Impact	Type of Impact	Impact Significance Before Mitigation	Cost	Measures to be Taken	Responsibility	Key Performance Indicators
						▪ Waste disposal records will be kept regularly. To keep these records, a Waste Registry Information Form will be prepared, which will contain information on the waste code, amount, and transfer and disposal method as presented in the Waste Management Regulation - ANNEX4. ▪ Where appropriate, waste can be reused or recycled. ▪ Temporary storage of medical waste will be performed in accordance with Article 14 of the Medical Waste Control Regulation. In addition, medical waste will be transported to processing facilities in accordance with Article 15 of the same regulation.		
C16	**Domestic Waste**	Waste management failure, pollution from waste	Adverse	Low	Included in construction costs	▪ Any domestic waste generated will be sorted at source (plastic, glass, paper, etc.), and reusable waste will be recycled. ▪ Unrecyclable waste will be collected in closed sanitary trash bins and will be disposed of by the solid waste collection system of Eskisehir/Odunpazari Municipalities.	Project Owner Contractor	▪ Total waste generated ▪ Ratio of recovered/reused/ recycled waste to total waste generated
C17	**Waste Oils**	Waste management failure, pollution from waste	Adverse	Low	Included in construction costs	▪ If different categories of oils are generated from the works at the construction site, these oils will be stored separately. ▪ Containers where waste oils are stored will be kept closed and protected from rainwater. ▪ Waste oils will only be transported by licensed transportation companies, and will only be delivered to licensed recycling or disposal facilities.	Project Owner Contractor	▪ Total waste generated ▪ Ratio of recycled to total waste generated
C18	**Waste Batteries and Accumulators**	Waste management failure, pollution from waste	Adverse	Low	Included in construction costs	▪ Waste batteries will be collected separately from other wastes, delivered to authorized organizations and recycled. ▪ Waste batteries and accumulators will be delivered to waste battery and accumulator disposal facilities within the Municipal borders through authorized transportation companies.	Project Owner Contractor	▪ Total waste generated ▪ Ratio of recycled total waste generated
C19	**End-of-life Tires**	Waste management failure, pollution from waste	Adverse	Low	Included in construction costs	▪ In cases when tires of the vehicles to be changed during construction activities; end-of-life tires will be delivered to the companies that distributes and sells tires via the authorized transportation companies.	Project Owner Contractor	▪ Total waste generated ▪ Ratio of recycled waste to total waste generated
C20	**Excavation Soil, Construction and Demolition Wastes**	Waste management failure, pollution from waste, loss of top soil	Adverse	Low	Included in construction costs	▪ Consideration will be given to recycling of excavation soil and construction wastes and especially to their reuse as infrastructure material. ▪ For a robust recycling and disposal system, waste will be sorted at source. ▪ Removal of the excavated material, which will not be used for backfilling, from the site will be performed at regular intervals without waiting. These materials will be transferred to permitted excavation waste storage area by licensed transportation companies.	Project Owner Contractor	▪ Total waste generated ▪ Ratio of recovered/reused/ recycled waste to total waste generated
C21	**Wastewater and Water Management**	Wastewater management failure, pollution from wastewater	Adverse	Low	Included in construction costs	▪ Wastewater generated during the construction works will be integrated into the existing sewerage system, and necessary agreements will be executed with the municipality so that the wastewater sewer system ending with Eskişehir Wastewater Treatment Plant.	Project Owner Contractor	▪ Minimization and continued improvement in the number of the reported water quality related incidents. ▪ Zero NCRs per year ▪ Zero grievances per year ▪ No significant adverse impact ▪ No infrastructure damage and damage to loads/humans
C22	**Hazardous Materials**	Pollution from hazardous materials	Adverse	Low	Included in construction costs	▪ If hazardous wastes are stored in the project area, those wastes will be stored in containers that are strong, leak-proof, safe and in accordance with internationally recognized standards. The containers will bear "hazardous waste" label, with the amount, content, properties, storage conditions and storage date of the stored material indicated on the containers. ▪ Containers containing hazardous materials will be placed in sealed vessels to prevent spills and leaks. ▪ Hazardous wastes will be transported by licensed waste transportation companies and will be disposed of at licensed facilities. ▪ Toxic paints, solvents or lead-based paints will not be used.	Project Owner Contractor	▪ Ratio of hazardous waste generated to total waste (by contamination + by generation)

No.	Topic	Definition of Potential Impact	Type of Impact	Impact Significance Before Mitigation	Cost	Measures to be Taken	Responsibility	Key Performance Indicators
						▪ Hazardous waste management will be fulfilled in consultation with Eskişehir/ Odunpazarı Municipality in accordance with the Hazardous Waste Control Regulation. ▪ Hazardous chemicals and wastes likely to be generated at the construction site will be stored not to pose a threat to community health. ▪ The disposal of hazardous chemicals and wastes that may be generated at the construction site will be carried out at licensed facilities under the supervision of authorized companies and experts.		
C23	**Cultural Heritage**	Loss of cultural heritage	Adverse	Low	Additional cost is not expected.	▪ Any artifacts found during the construction works will be indicated and recorded as “chance finds”. A “Chance Find Procedure” has been prepared for the steps to be followed and implemented after the chance finding. ▪ The Cultural and Natural Assets Conservation Boards will be informed about the chance finds and the approval of the Conservation Board, who is responsible for the area where the construction site is located, will be required. No demolition/construction work will be carried out when awaiting the said approval. ▪ All relevant actions for demolition, postponing or rescheduling of construction activities regarding the chance finds will be put into effect. ▪ Any correspondence on this subject will be updated in accordance with all decisions taken, and all documents will be submitted as annexed to ESMP.	Project Owner Contractor	▪ Number of chance find records and reports
C24	**Project Affected Forests, Wetlands and/or Protected Areas**	Protection	Adverse	Low	Additional cost is not expected.	▪ No impact is expected on flora and fauna during the construction phase. Therefore, there is no need to take mitigation measures.	Project Owner contractor	▪ Zero damage to natural habitats, wetlands and sites considered as protected areas ▪ Zero hunting, foraging, logging
C25	**Project Affected Forests, Wetlands and/or Protected Areas**	Biodiversity	Adverse	Low	Additional cost is not expected.	▪ No impact is expected on flora and fauna during the construction phase. Therefore, there is no need to take mitigation measures.	Project Owner contractor	▪ Zero damage to natural habitats, wetlands and sites considered as protected areas ▪ Zero hunting, foraging, logging

8.2 Mitigation Plan for the Operation Phase of the Project

No.	Topic	Definition of Potential Impact	Type of Impact	Impact Significance Before Mitigation	Cost	Measures to be Taken	Responsibility	Key Performance Indicators
O1	**Labor Conditions**	Improper Working Conditions Child Labor, forced Labor and unregistered employment	Adverse	Low	Additional cost is not expected	• Workers will be familiar with the Grievance Redress Mechanism officer and will be enabled to have access to and be aware of the Grievance Redress Mechanism. • Minimum legal labor standards will be met (child/forced labor, anti-discrimination, working hours, minimum wages) as per ILO regulations. • At the same time, WB OPs given in Chapter 4 and the national legislation given in Table 3-1 will be complied with in terms of the working conditions.	Project Owner	▪ Number of grievances ▪ Percentage of closed grievances within the target timeframe
O2	**Occupational Health and Safety**	Inadequate workers health and safety conditions	Adverse	Low	Additional cost is not expected	• Before starting work, employees will be knowledgeable about job descriptions, responsibilities, relationships with the local people, and risks that may threaten occupational health and safety. • Workers will be provided with appropriate induction, health and safety training and information. • All equipment used during the operation phase will be kept in good working condition. • EPRP will be prepared for a potential accident and emergency. Emergency teams will be formed, and drills and training programs will be carried out in line with emergency scenarios. • Employees will have a good command of emergency plans, and the grievance will be reported to the authorized teams and resolved, if they require urgent action. • In case of any potential accident involving injury during the operation phase, the equipment for the first aid will be kept available at the rehabilitation center, taking into account that first aid response may be required before the casualty is referred to the nearest healthcare provider. • The Project Owner formally agrees that all work will be carried out in a safe and disciplined manner and is designed to minimize risks on neighboring residents and environment. • All activities will be implemented in line with both the Law on Occupational Health and Safety and its relevant regulations, and also the WBG's EHS Guidelines. • Both trainings and incidents (fatalities, lost time incidents, outbreak of pandemic or communicable diseases, social unrest, etc.) will be recorded. • In the event of any significant incident (e.g. environmental, social, labor or lost-time incidents) municipality shall inform ILBANK and WB within three business days. Then, within 30 days, a report on the root causes of the incident and the corrective actions to be taken will be presented to ILBANK and WB. • Equipment that meets international standards in terms of performance and safety will be used at the rehabilitation center;	Project Owner	▪ % of scheduled HSE Inspection ▪ % of attendance at HSE meetings ▪ % of closing of NCRs ▪ Reporting safe observations ▪ Reporting unsafe observations ▪ Reporting near misses ▪ % of Toolbox attending ▪ % of Risk Assessment compliance ▪ % of Legal Requirements compliance ▪ Results of scheduled audits ▪ HSE training carried out to training matrix ▪ > 90% of all training to matrix ▪ % of attendance at scheduled trainings ▪ Engagement in HSE program by individual managers and supervisors ▪ Engagement in HSE program by contractor's
O3	**Community Health and Safety**	Community health and safety risks	Adverse	Low	Additional cost is not expected	• The public, and nearby institutions and organizations, and hospitals and schools will be informed at least two days before starting repair / maintenance works that may cause disturbance temporarily. • The grievance redress mechanism officer will be introduced to the local people and updated information about the grievance redress mechanism will continue to be provided. In case of an update in the documents, the updated information will be announced to the local people through the relevant headman's office.	Project Owner	▪ Number of communicable and non-communicable diseases and injuries. ▪ Number of community health safety & security complaints from local communities as recorded in the grievance register ▪ Number of reported community health & safety incidents ▪ Number of reported noise incidents
O4	**Grievance Redress Mechanism**	Grievance issues	Adverse	Low	Additional cost is not expected	• An efficient Grievance Redress Mechanism will be initiated to allow potentially affected community members and the employees to voice their concerns on the Project.	Project Owner	▪ Number of grievances ▪ Percentage of closed grievances within the target timeframe

No.	Topic	Definition of Potential Impact	Type of Impact	Impact Significance Before Mitigation	Cost	Measures to be Taken	Responsibility	Key Performance Indicators
O5	**Stakeholder Engagement**	Communication issues with the stakeholders	Adverse	Low	Additional cost is not expected	• Interaction / communication will be established with communities, and adequate timing will be planned for engagement activities. Additionally, regular consultations will be carried out with the authorities and communities regarding the project management.	Project Owner	▪ Number of grievances ▪ Percentage of closed grievances within the target timeframe ▪ Records of stakeholder engagement activities
O6	**Air Quality and Energy Saving**	Low air quality	Adverse	Low	Additional cost is not expected	• Vehicles and equipment to be used during the operation phase will be regularly maintained, and maintenance records will be kept.	Project Owner	▪ Number of grievances ▪ Percentage of closed grievances within the target timeframe
O7	**Water Use and Wastewater**		Adverse	Low	Additional cost is not expected	• Eskişehir Metropolitan Municipality currently has Wastewater Treatment Plant. The number of employees in the planned Project is predicted to be 12. Therefore, the wastewater generation and its impact on the environment will be negligible.	Project Owner	▪ Minimization and continued improvement in the number of the reported water quality related incidents. ▪ Zero NCRs per year ▪ Zero grievances per year ▪ No significant adverse impact ▪ No infrastructure damage and damage to loads/humans
O8	**Waste and Chemical Management**		Adverse	Low	Additional cost is not expected	• Waste will be characterized based on their composition, source, types, generation rates or local legal requirements. • In addition to the adoption of waste prevention strategies, putting recycling plans into practice will considerably reduce the total amount of waste. • If waste materials are still generated after appropriate waste prevention, reduction, reuse and recycling measures are put into action, all necessary measures will be taken to avoid potential effects of waste material treatment and disposal on human health and the environment.	Project Owner	▪ Total waste generated ▪ Ratio of hazardous waste generated to total waste (by contamination + by generation) ▪ Ratio of recovered/reused/ recycled waste to total waste generated
O9	**Waste Batteries and Accumulators**		Adverse	Low	Additional cost is not expected.	• Waste batteries will be collected separately from other wastes, delivered to authorized organizations and recycled. • Waste batteries and accumulators will be delivered to waste battery and accumulator disposal facilities within the Municipal boundaries through authorized transportation companies.	Project Owner	▪ Total waste generated
O10	**Medical Waste**		Adverse	Low	Additional cost is not expected.	• Red plastic bags of the following qualities will be used: Bearing the 'International Biohazard' emblem, Resistant to tearing, puncture, explosion, transportation, made of medium density polyethylene, equipped with seal, with double bottom seam and without bellows, with a 100-micron thick double layer, having a minimum lifting capacity of 10 kilograms, and Bearing 'Caution Medical Waste' warning on both sides. Medical waste will be collected by being filled in colored plastic bags or boxes made of laminated cardboard or containers of the same qualities at a maximum rate of 3/4. Medical waste bags / containers will be delivered to the nearest healthcare provider or the nearest municipality without being compressed with the help of transportation companies authorized for the transportation of such wastes.	Project Owner	▪ Total waste generated
O11	**Biodiversity**		Adverse	Low	Additional cost is not expected.	• The Project has no impact on flora and fauna during the operational phase. Therefore, there is no need to take mitigation measures.	Project Owner	▪ No impact on flora and fauna

9 ENVIRONMENTAL AND SOCIAL MONITORING PLAN

The monitoring, review and audit program detailed in Section 9.1 and Section 9.2 will be implemented during construction and operation phases to monitor the implementation of the environmental and social commitments of the ESMP requirements. Monitoring for the implementation of mitigation measures and commitments provided in the ESMP will be carried out continuously by the contractor and Project Owner in line with Monitoring Plan starting from the Construction Project. Project Owner will audit the Project every six (6) months during the construction period and once a year during the operation period. The Project Owner will be responsible for ensuring that the Contractor and its subcontractors comply with applicable national/international regulations and lenders' requirements.

Key performance indicators (KPIs) of this procedure will be monitored, verified and evaluated within the scope of the project monitoring phase. The KPIs are presented in Table 9-1 below.

Table 9-1. Key Performance Indicators

KPI	Target
Air Quality	
Air Quality incidents	Minimization and continued improvement in the number of the reported air quality related incidents.
Non-Compliance with air quality standards	Zero complaints per year
Community complaints	Minimization and continued improvement in the number of air quality related community complaints.
Noise	
Noise and Vibration incidents	Minimize and continued improvement in number of reported noise and vibration related incidents.
Non-Compliance with Project standards	Zero Non Compliance Reports (NCRs) per year
Number of noise-related community grievances	Zero grievances per year
Water	
Spill incident	Minimization and continued improvement in the number of the reported water quality related incidents.
Non-Compliance with Project standards	Zero NCRs per year
Wastewater collection system	Zero grievances per year
Groundwater levels of the community/private wells	No significant adverse impact
Water quality analyses	Meeting set national and international water quality standards for surface and groundwater impacted and/or near the Project
Flood incidents	No infrastructure damage and damage to loads/humans
Waste	
Waste Generation	Total waste generated Ratio of hazardous waste generated to total waste (by contamination + by generation)
Waste Disposal	Ratio of recovered/reused/recycled waste to total waste generated

KPI	Target
Soil	
Spill incident	Minimization and continued improvement in the number of the reported soil quality related incidents.
Non-Compliance with Project standards	Zero NCRs per year
Number of soil-related community grievances	Zero grievances per year
Traffic	
Number of non-compliances against the mitigation controls identified in Traffic Management Plan	Decreasing number/ continuous improvement in number of reported non-compliances
Number of drivers found to be exceeding speed limits or driving unsafely	Zero exceedance per year
Number of road traffic accidents involving: Accidental injuries and deaths, Spillages (such as cargo or fuel), Wildlife-vehicle collisions.	Zero accidents per year
Number of traffic-related grievances	Zero grievances per year
Health, Safety and Environment	
% of scheduled HSE Inspection	>90
% of attendance at HSE meetings	>90
% of closing of NCRs	100
Reporting safe observations	100%
Reporting unsafe observations	100%
Reporting near misses	100%
% of Toolbox attending	>90
% of Risk Assessment compliance	>90
% of Legal Requirements compliance	>90
Results of scheduled audits	>85
HSE training carried out to training matrix > 90% of all training to matrix	>90
% of attendance at scheduled trainings	>90
Engagement in HSE program by individual managers and supervisors	>90
Engagement in HSE program by contractor's	>90
Labor and Working Conditions	
Number of worker grievances closed out within the target timeframe	Zero worker grievances closed out of time
Community Health and Safety	
Number of communicable and non-communicable diseases and injuries.	Negative Trend
Number of community health safety & security complaints from local communities as recorded in the grievance management system.	Decreasing number/ continuous improvement in number of complaints
Number of reported community health & safety incidents	Zero incidents per year
Number of reported noise incidents	Zero incidents per year

9.1 Monitoring Plan for the Construction Phase

Issue	Monitoring Location	Timing / Frequency of Monitoring	Parameters Monitored	Monitoring Method	Target/ threshold values	Legal Requirements for monitoring	Key Performance Indicators	Cost	Responsible Party
Disclosure	Settlements near the project area	During Construction Monthly	Grievances	▪ On-site inspections ▪ Minutes of meetings ▪ Grievance redress mechanism records	Zero grievances closed out within the target timeframe	▪ Regulation on Assessment and Management of Environmental Noise ▪ Regulation on Air Quality Assessment and Management ▪ WB OP 4.01	▪ Grievance Records ▪ Number of grievances ▪ Percentage of closed grievances within the target timeframe	Brings no additional cost	Project Owner Contractor
Labor Conditions	Project area	Monthly	Grievances	▪ Internal and external audits ▪ Grievance records ▪ Accident records ▪ Training records ▪ Sample contracts ▪ Human Resource Policy ▪ Number of the local employees ▪ Legal work permit	Zero grievances closed out within the target timeframe	▪ Labor Law (No. 4857) ▪ Law on Trade Unions and Collective Bargaining Agreements ▪ ILO International Regulations	▪ Number of worker grievances ▪ Percentage of closed grievances within the target timeframe	No additional costs	Project Owner Contractors
Occupational Health and Safety	Project area Settlements near the project area	Daily	Safe conditions on the construction site Risk analysis and procedures Disease Incidents Grievenaces Toolbox talks and trainings HSE Inspection Legal Requirements EPRP	▪ On-site inspections ▪ Interviews with employees ▪ Complaint records ▪ Training and toolbox records ▪ Contract examples ▪ Internal and external audits ▪ Accident and near miss records ▪ Drill records	The targets are expressed numerically in Table 9-1	▪ Occupational Health and Safety Law ▪ Regulation on Health and Safety Requirements for the Use of Work Equipment	▪ % of scheduled HSE Inspection ▪ % of attendance at HSE meetings ▪ % of closing of NCRs ▪ Reporting safe observations ▪ Reporting unsafe observations ▪ Reporting near misses ▪ % of Toolbox attending ▪ % of Risk Assessment compliance ▪ % of Legal Requirements compliance ▪ Results of scheduled audits ▪ HSE training carried out to training matrix ▪ > 90% of all training to matrix ▪ % of attendance at scheduled trainings ▪ Engagement in HSE program by individual managers and supervisors ▪ Engagement in HSE program by contractor’s	No additional costs	Project Owner Contractors

Issue	Monitoring Location	Timing / Frequency of Monitoring	Parameters Monitored	Monitoring Method	Target/ threshold values	Legal Requirements for monitoring	Key Performance Indicators	Cost	Responsible Party
Community Health & Safety	Project area Residential areas around project area	Daily	Safety conditions at the site Fencing of construction site Warning signs and flashlights Grievances Incidents Accidents	▪ Records of comments/ suggestions/ grievances ▪ Site Audits ▪ Training records	No significant increase in communicable and non-communicable disease and injury rates per 1,000 residents per annum. Decreasing number/ continuous improvement in number of complaints Zero incidents per year	▪ Public Health Law ▪ Health and Safety Signs Regulation	▪ Number of communicable and non-communicable diseases and injuries. ▪ Number of community health safety & security complaints from local communities as recorded in the grievance management system. ▪ Number of reported community health & safety incidents ▪ Number of reported noise incidents	No additional costs	Project Owner Contractors
Documentation	Project area	During the construction period, the contractor will report the ESMRs monthly to the Project owner, the Project Owner to ILBANK every 3 months together with the Grievance Register. Moreover, ILBANK, will compile these ESMRs and report them to WB biannually together with the Project Progress Report.	N/A	▪ On-site inspection ▪ Record control	N/A	WB OP 4.01	N/A	No additional costs	Project Owner Contractors ILBANK
Land Use	Project area Settlements near the project area	Monthly	Grievance Records	▪ Grievance redress mechanism ▪ Compensation for unintended damages to land and structures during construction	Zero grievances not closed out within the target timeframe	▪ WP OP 4.12 ▪ Soil Conservation and Land Use Law No. 5400	▪ Grievance Records ▪ Number of grievances ▪ Percentage of closed grievances within the target timeframe	No additional costs	Project Owner Contractors
Grievance Redress Mechanism	Project area Settlements near the project area	Monthly	Grievance Records	▪ View/suggestion/ grievance records ▪ On-site inspection	Zero grievances not closed out within the target timeframe	ILBANK SCP-II ESMF	▪ Grievance Records ▪ Number of grievances ▪ Percentage of closed grievances within the target timeframe	No additional costs	Project Owner Contractors
Sustainable Development	Settlements near the project area	Monthly	N/A	▪ View/suggestion/grievance records ▪ Product supply records ▪ List of employees ▪ On-site inspection	N/A	WB OP 4.01	N/A	No additional costs	Project Owner Contractors
Air Quality	Project area Settlements and schools near the project area	During Construction In case of grievance Monthly	Grievance Records	▪ On-site inspections ▪ PM2.5 and PM10 Measurements to be performed in case of grievance	▪ Minimization and continued improvement in the number of the reported air quality related incidents. ▪ Zero complaints per year ▪ Minimization and continued improvement in the number of air quality related community complaints.	▪ Regulation on Air Quality Assessment and Management ▪ WB OP 4.01	▪ Air Quality incidents ▪ Records of Non-Compliance with air quality standards ▪ Community complaints	No additional costs	Contractors

Issue	Monitoring Location	Timing / Frequency of Monitoring	Parameters Monitored	Monitoring Method	Target/ threshold values	Legal Requirements for monitoring	Key Performance Indicators	Cost	Responsible Party
Noise	Project area Settlements and schools near the project area	During Construction In case of grievance Monthly	Grievance Records	▪ Monitoring conducted at the nearest sensitive receptors using noise measuring devices ▪ On-site inspections ▪ Measurements to be performed in case of grievance	▪ Minimize and continued improvement in number of reported noise and vibration related incidents. ▪ Zero NCRs per year ▪ Zero grievances per year	Regulation on Assessment and Management of Environmental Noise	▪ Noise and Vibration incidents ▪ Records of Non-Compliance with Project standards ▪ Number of noise-related community grievances	No additional costs	Contractors
Waste Management	Project area	During Construction Daily	▪ Temporary waste storage area conditions ▪ Waste amount ▪ Recovery / reuse / recycle ratio	▪ Waste records ▪ On-site inspection	▪ Minimization of total waste generated ▪ Minimize the ratio of hazardous waste generated to total waste (by contamination + by generation) ▪ Increasing the ratio of recovered/reused/recycled waste to total waste generated	▪ Regulation on Hazardous Waste Control ▪ Packaging Waste Control Regulation ▪ Waste Management Regulation	▪ Total waste generated ▪ Ratio of hazardous waste generated to total waste (by contamination + by generation) ▪ Ratio of recovered/ reused/ recycled waste to total waste generated	No additional costs	Contractors
Domestic Waste	Project area	During Construction Daily	▪ Waste amount ▪ Recovery /reuse /recycle ratio	▪ Waste records ▪ On-site inspection	▪ Minimization of total waste generated ▪ Increase in the ratio of recovered/ reused/ recycled to landfilled	▪ Packaging Waste Control Regulation ▪ Waste Management Regulation	▪ Total waste generated ▪ Ratio of recovered/ reused/ recycled waste to total waste generated ▪ Records regarding transportation and disposal.	No additional costs	Contractors
Waste Oils	Project area	During Construction Weekly	▪ Waste amount ▪ Waste storage conditions ▪ Recovery /reuse/ recycle ratio	Visual observations Waste records	▪ Minimization of total waste generated ▪ Increase in the ratio of recovered/ reused/ recycled waste to total waste generated	Waste Oil Control Regulation	▪ Total waste generated ▪ Ratio of recycled waste to total waste generated. ▪ Records regarding transportation and disposal.	No additional costs	Contractors
Waste Batteries and Accumulators	Project area	During Construction Monthly	▪ Waste amount ▪ Recovery /reuse/ recycle ratio	Waste records	▪ Minimization of total waste generated ▪ Increase in the ratio of recovered/ reused/ recycled waste to total waste generated	Waste Battery and Accumulator Regulation	▪ Total waste generated ▪ Ratio of recycled waste to total waste generated. ▪ Records regarding transportation and disposal.	No additional costs	Contractors
Excavation Soil, Construction and DebrisDemolition Wastes	Project area	During Construction Daily	Waste amount and storage conditions Transfer records	On-site inspection	▪ Minimization of total waste generated ▪ Increase in the ratio of recovered/ reused/ recycled waste to total waste generated	Regulation on the Control of Excavation Soil, Construction and Demolition Wastes	▪ Total waste generated ▪ Records regarding transportation and disposal.	No additional costs	Contractors
Wastewater and Water Management	Project area	During Construction At the beginning of the project.	Sewer connection permit.	Official Letter regarding permit.	▪ Permit in place.	▪ Water Pollution Control Regulation	▪ Permit	No additional costs	Contractors

Issue	Monitoring Location	Timing / Frequency of Monitoring	Parameters Monitored	Monitoring Method	Target/ threshold values	Legal Requirements for monitoring	Key Performance Indicators	Cost	Responsible Party
Hazardous Waste Management	Project area	During Construction Daily	Waste amount and storage conditions	▪ Waste records ▪ On-site inspection	Increase in the ratio of hazardous waste generated to total hazardous waste (by contamination + by generation)	Waste Management Regulation	▪ Total waste generated ▪ Records regarding transportation and disposal.	No additional costs	Contractors
Cultural Heritage	Project area Settlements near the project area	Daily throughout the construction Monthly	Existence of a Chance Find	▪ On-site inspection ▪ Existence of a Chance Find Procedure	Zero Grievance Records	▪ Law on the Conservation of Cultural and Natural Properties ▪ WB OP 4.11	▪ Number of chance find records and reports	No additional costs	Contractors
Direct and indirect threats posed by construction activities against traffic and pedestrians	Project area	During Construction Daily	Grievance Information gethered through Public Consultation Information on avaliable padastrien ways Existance and number of warning signes properly installed at desigred location Traning records for dirivers Avaliablity of EPRP	On-site inspection	▪ Number of non-compliances against the mitigation controls identified in Traffic Management Plan ▪ Zero number of drivers found to be exceeding speed limits or driving unsafely ▪ Number of road traffic accidents involving: ▪ Zero accidental injuries and deaths, ▪ Zero traffic-related grievances ▪ Driver training records ▪ Existence of EPRP ▪ Installation of warning signs	Occupational Health and Safety Law	▪ Number of non-compliances against the mitigation controls identified in Traffic Management Plan ▪ Number of drivers found to be exceeding speed limits or driving unsafely ▪ Number of road traffic accidents involving: ▪ Accidental injuries and deaths ▪ Spillages (such as cargo or fuel) ▪ Wildlife-vehicle collisions ▪ Number of traffic-related grievances	No additional costs	Contractors
Access to the Construction Site **Security Fence** **Protection Tape**	Settlements near the project area	During Construction Daily	Grievance	On-site inspection	Zero Number of unauthorized accesses to the project site	Occupational Health and Safety Law	Number of unauthorized accesses to the project site	No additional costs	Contractors

9.2 Monitoring Plan for Operation Phase

Issue	Monitoring Location	Timing / Frequency of Monitoring	Parameters Monitored	Monitoring Method	Target/ threshold values	Legal Requirements for monitoring	Key Performance Indicators	Cost	Responsible Party
Disclosure	Settlements near the project area	During the lifetime of the project Daily	Grievances	▪ On-site inspections ▪ Minutes of meetings ▪ Grievance redress mechanism records	Zero grievances not closed out within the target timeframe	▪ Regulation on Assessment and Management of Environmental Noise ▪ Regulation on Air Quality Assessment and Management ▪ WB OP 4.01	▪ Grievance Records ▪ Number of grievances ▪ Percentage of closed grievances within the target timeframe	Brings no additional cost	Project Owner
Labor Conditions	Project route and maintenance areas	Monthly	Grievances	▪ Internal and external audits ▪ Grievance records ▪ Accident records ▪ Training records ▪ Sample contracts	Zero grievances not closed out within the target timeframe	▪ Labor Law (No. 4857) ▪ Law on Trade Unions and Collective Bargaining Agreements	▪ Number of worker grievances ▪ Percentage of closed grievances within the target timeframe	No additional costs	Project Owner

Issue	Monitoring Location	Timing / Frequency of Monitoring	Parameters Monitored	Monitoring Method	Target/ threshold values	Legal Requirements for monitoring	Key Performance Indicators	Cost	Responsible Party
				▪ Human Resource Policy ▪ Number of the local employees ▪ Legal work permit		▪ ILO International Regulations			
Occupational Health and Safety	Project area Settlements near the project area	Monthly	Disease Incidents Grievenaces Trainings HSE Inspection Legal Requirements Compliance with Emergency Plans	▪ On-site inspections ▪ Interviews with employees ▪ Complaint records ▪ Training records ▪ Contract examples ▪ Internal and external audits ▪ Emergency Plans ▪ Accident records	The targets are expressed numerically in Table 9-1.	▪ Occupational Health and Safety Law ▪ Regulation on Health and Safety Requirements for the Use of Work Equipment	▪ % of scheduled HSE Inspection ▪ % of attendance at HSE meetings ▪ % of closing of NCRs ▪ Reporting safe observations ▪ Reporting unsafe observations ▪ Reporting near misses ▪ % of Toolbox attending ▪ % of Risk Assessment compliance ▪ % of Legal Requirements compliance ▪ Results of scheduled audits ▪ HSE training carried out to training matrix ▪ > 90% of all training to matrix ▪ % of attendance at scheduled trainings ▪ Engagement in HSE program by individual managers and supervisors ▪ Engagement in HSE program by contractor's	No additional costs	Project Owner
Community Health & Safety	Project area Residential areas around project area	Monthly	Grievances Incidents Accidents	▪ Records of comments/ suggestions/ grievances ▪ Site Audits ▪ Training records	No significant increase in communicable and non-communicable disease and injury rates per 1,000 residents per annum. Decreasing number/ continuous improvement in number of complaints Zero incidents per year	▪ Public Health Law ▪ Health and Safety Signs Regulation	▪ Number of communicable and non-communicable diseases and injuries. ▪ Number of community health safety & security complaints from local communities as recorded in the grievance management system. ▪ Number of reported community health & safety incidents ▪ Number of reported noise incidents	No additional costs	Project Owner
Documentation	Project area	The arrangements and measures made at the site and the situations encountered will be reported to the Project ESMRs as monthly period by the contractor during the construction phase together with the Grievance Register. The Project Owner will report ESMRs quarterly to ILBANK. ILBANK, on the other hand, will compile these ESMRs	N/A	▪ On-site inspection ▪ Record control	N/A	WB OP 4.01	N/A	No additional costs	Project Owner ILBANK

Issue	Monitoring Location	Timing / Frequency of Monitoring	Parameters Monitored	Monitoring Method	Target/ threshold values	Legal Requirements for monitoring	Key Performance Indicators	Cost	Responsible Party
		and report them to WB biannually together with the Project Progress Report.							
Grievance Redress Mechanism	Project area Settlements near the project area	Monthly	Grievance Records	▪ View/suggestion/grievance records ▪ On-site inspection	Zero grievances closed out within the target timeframe	ILBANK SCP-II ESMF	▪ Grievance Records ▪ Number of grievances ▪ Percentage of closed grievances within the target timeframe	No additional costs	Project Owner
Waste Management	Project area	During the lifetime of the project. In case of grievance Daily	▪ Waste amount ▪ Recovery / reuse / recycle ratio	▪ Waste records ▪ On-site inspection	▪ Minimization of total waste generated ▪ Minimize the ratio of hazardous waste generated to total waste (by contamination + by generation) ▪ Increasing the ratio of recovered/reused/ recycled waste to total waste generated	▪ Regulation on Hazardous Waste Control ▪ Packaging Waste Control Regulation ▪ Waste Management Regulation ▪ Waste Oil Control Regulation ▪ Waste Battery and Accumulator Regulation ▪ Medical Waste Control Regulation	▪ Total waste generated ▪ Ratio of hazardous waste generated to total waste (by contamination + by generation) ▪ Ratio of recovered/reused/ recycled waste to total waste generated ▪ Records regarding transportation and disposal	No additional costs	Project Owner

10 REPORTING

Reporting processes that should be put into action during the implementation phase of the project and the requirements of such processes are presented in Table 10-1.

Table 10-1. Reporting Process Requirements and Distribution of Roles

Responsible Party	Reporting Process Requirements
Project Management Unit (Project Owner)	▪ Prepare Project Information memos and submit such memos to ILBANK quarterly. ▪ Summarize environmental and social aspects of project implementation in ESMRs for ILBANK quarterly and submit together with the Grievance Register.
Contractor	▪ Prepare and submit monthly ESMRs for the approval of the Odunpazarı Municipality
Construction Supervision Consultants	▪ Audit Contractor on be half of Project Owner and prepare bi annual monitoring reports during construction works and annual audit reports for operation phase of the project.
WB and ILBANK	▪ ILBANK will inform the WB with ESMRs every six months together with Project Progress Reports. In addition to this information, the WB will audit the project activities and progress through on-site inspections that will be conducted by the WB periodically.

11 CONCLUSION

This ESMP identifies the potential impacts that may arise during construction and operation phases of the Project and proposed appropriate mitigation measures to effectively address these impacts. In conclusion, the Project can be carried out in an environmentally and socially sustainable manner on full implementation of this ESMP as there are no likely major or irreversible negative impacts.

As part of the requirements stipulated by the Lenders, ESMP is to be publicly disclosed by the Project Owner's and the Lender's website. ESMP will be reviewed, updated, and approved if necessary. For each approved updated version of this ESMP, the Project Owner will be responsible for the disclosure of the updated documents.

12 REFERENCES

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Appendix-A
Land Title Deed Record

This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliği, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklaşa finanse edilmektedir

Project Area Title Deed Record

BU BELGE TOPLAM 2 SAYFADAN OLUŞMAKTADIR BİLGİ AMAÇLIDIR.

Tarih: 22-11-2021-13:34

webtapu tapunun kısayolu

Tapu Kaydı (Aktif Malikler için Detaylı - ŞBİ var)

TAPU KAYIT BİLGİSİ

Zemin Tipi:	AnaTasinmaz
Taşınmaz Kimlik No:	117017774
İl/İlçe:	ESKİŞEHİR/ODUNPAZARI
Kurum Adı:	Odunpazarı
Mahalle/Köy Adı:	ÇANKAYA Mah.
Mevkii:	-
Cilt/Sayfa No:	1/86
Kayıt Durum:	Aktif

Ada/Parsel:	24806/1
AT Yüzölçüm(m2):	1898.63
Bağımsız Bölüm Nitelik:	
Bağımsız Bölüm Brüt YüzÖlçümü:	
Bağımsız Bölüm Net YüzÖlçümü:	
Blok/Kat/Giriş/BBNo:	
Arsa Pay/Payda:	
Ana Taşınmaz Nitelik:	Arsa

MÜLKİYET BİLGİLERİ

(Hisse) Sistem No	Malik	El Birliği No	Hisse Pay/ Payda	Metrekare	Toplam Metrekare	Edinme Sebebi-Tarih-Yevmiye	Terkin Sebebi-Tarih-Yevmiye
610304030	(SN:1943831) ODUNPAZARI BELEDİYESİ VKN:6340013127	-	1/1	1898.63	1898.63	3402 S.Y. Kadastro Kanununun Ek 1. Maddesi Gereği Yüz Ölçüm ve Cins Değişikliği İşlemleri	-

Appendix-B
Exclusion Letter

This project is co-funded by the European Union, the Republic of Turkey and the World Bank
Bu Proje Avrupa Birliği, Türkiye Cumhuriyeti ve Dünya Bankası tarafından ortaklaşa finanse edilmektedir

T. C.
ESKİŞEHİR VALİLİĞİ
Çevre, Şehircilik ve İklim Değişikliği İl Müdürlüğü

Sayı : E-43549071-220.03-2602757
Konu : ÇED Görüşü

ODUNPAZARI BELEDİYE BAŞKANLIĞINA

İlgi : 03.01.2022 tarihli ve 153788 referans no.lu başvuru.

İlimiz, Odunpazarı İlçesi, Çankaya Mahallesi, 24806 ada, 1 parselde tarafınızca yapılması planlanan "Engelsiz Yaşam ve Otizm Merkezi" projesi, 25.11.2014 tarih ve 29186 sayılı Resmi Gazete'de yayımlanarak yürürlüğe giren ÇED Yönetmeliği listelerinde yer almadığından kapsam dışı olarak değerlendirilmiştir.

Ancak, faaliyetiniz kapsamında, 2872 sayılı Çevre Kanunu ile bu Kanuna istinaden çıkarılan Yönetmeliklerin ilgili hükümlerine uyulması ve diğer meri mevzuat çerçevesinde öngörülen gerekli izinlerin alınması, ekolojik dengenin bozulmamasına, çevrenin korunmasına ve geliştirilmesine yönelik tedbirlere riayet edilmesi, kurulum faaliyetlerinin tamamlanmasına müteakip Çevre İzin ve Lisans Yönetmeliği hükümleri uyarınca Müdürlüğümüz görüşü alınması hususunda;

Bilgilerinizi ve gereğini rica ederim.

Hikmet ÇELİK
Çevre, Şehircilik ve İklim Değişikliği İl Müdürü

Ana Bina: Ertuğrulgazi Mah. Aliya İzzetbegoviç Cad. No:2 Tepebaşı/ESKİŞEHİR
Ek Bina: Hoşnudiye Mah. Behiç Erkin Cad.No:10/B Tepebaşı/ESKİŞEHİR
Tel.:0(222) 335 88 98 Faks:0(222) 325 00 25
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Web:eskisehir.csb.gov.tr e-posta:eskisehir@csb.gov.tr UETS:35890-70984-24678
Bilgi için:Fatih ÖKSÜZ
Kimyager
Telefon No:(222) 335 88 98-215

Appendix-C
Noise Measurement Report

This project is co-funded by the European Union, the Republic of Turkey and the World Bank
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TÜRKAK Test TS EN ISO/IEC 17025 AB-0425-T
AB-0425-T
10/21

İlk Basım: 03.05.2010
RP.02 / Rev.05
Rev. Tarihi: 25.09.2019
Sayfa 1 / 5

DENEY RAPORU / Test Report

Müşterinin Adı/ Adresi Customer Name / Address	2U1K MÜHENDİSLİK VE DANIMANLIK A.Ş. Mustafa Kemal Mahallesi, Dumlupınar Blv., 9.Km Tepe Prime İş ve Yaşam Merkezi No:266 D:37 B Blok Çankaya/Ankara
Ölçüm Tarihi: Measurement Date	21.10.2021–22.10.2021 (Gürültü Ölçümü)
Proje Adı ve No Name and Number of the Project	Mevcut Durum Gürültü Ölçümü P-26928/21
Açıklamalar Remarks	Eskişeir ili Odunpazarı ilçesi'nde '' Odunpazarı Belediyesi Engelsiz Yaşam ve Otizm Merkezi Projesi' kapsamında olmak üzere 24 saatlik çevresel gürültü ölçümleri gerçekleştirilmiştir.
Raporun Tarihi ve Sayfa Sayısı ***Number and date of the Pages of the Report***	– 5 sayfa

Deney laboratuvarı olarak faaliyet gösteren SEGAL Çevre Ölçüm ve Analiz Laboratuarı Müh. Müş. Proje Hizm. San. Tic. Ltd. Şti. TÜRKAK'tan AB-0425-T ile TS EN ISO IEC 17025 standardına göre akredite edilmiştir. SEGAL Çevre Ölçüm ve Analiz Laboratuarı Müh. Müş. Proje Hizm. San. Tic. Ltd. Şti. accredited by TÜRKAK under registration number AB-0425-T for TS EN ISO IEC 17025 as test laboratory"
Türk Akreditasyon Kurumu (TÜRKAK) deney raporlarının tanınırlığı konusunda Avrupa Akreditasyon Birliği (EA) ile Çok Taraflı Anlaşma ve Uluslararası Laboratuvar Akreditasyon Birliği(ILAC) ile karşılıklı tanıma anlaşması imzalamıştır. Turkish Accreditation Agency (TURKAK) is a signatory to the European co-operation for Accreditation (EA) Multilateral Agreement (MLA) and to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA) for the recognition of test reports
Deney ve/veya ölçüm sonuçları, genişletilmiş ölçüm belirsizlikleri ve deney/ölçüm metotları takip eden sayfalarda verilmiştir. The test and /or measurements results, the uncertainties with confidence probability and test methods are given on the following pages which are part of this report.

Raporu Hazırlayan Prepared by	Raporu Onaylayan Confirm by
Kamil Erhan CAN Kimyager	Fevzi KARAKAYA Laboratuar Müdürü

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DENEY RAPORU / Test Report

GENEL BİLGİLER

1. MEVCUT DURUM GÜRÜLTÜ DÜZEYİNE İLİŞKİN BİLGİLER

Ölçüm proje alanına yakın hassas yerleşim yerinde gürültü ölçümü yapılmıştır

Tablo.1 Ölçüm Noktalarının Koordinatları

Ölçüm Noktası	Koordinat
Hassas Yerleşim Yeri	39.756224- 30.536354

Resim-1: Gürültü Ölçüm Noktasının Uydu Görüntüsü

Tablo.2 Mevcut Durum Gürültü Seviyesi Ölçüm Sonuçları-Gündüz

Ölçüm Noktası	Tarihi	Ölçüm Türü	Ölçüm Sonuçları (dBA)		
			L_{eq}	L_{90}	L_{Amax}
Hassas Alıcı	21.10.2021 22.10.2021	Leq-gündüz	69,3	45,7	94,4

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İlk Basım: 03.05.2010
RP.02 / Rev.05
Rev. Tarihi: 25.09.2019
Sayfa 3 / 5

TÜRKAK Test TS EN ISO/IEC 17025 AB-0425-T | AB-0425-T | 10/21

DENEY RAPORU / Test Report

Tablo.3 Mevcut Durum Gürültü Seviyesi Ölçüm Sonuçları-Akşam

Ölçüm Noktası	Tarihi	Ölçüm Türü	Ölçüm Sonuçları (dBA)		
			L_{eq}	L_{90}	L_{Amax}
Hassas Alıcı	21.10.2021	Leq-akşam	54,9	44,4	74,2

Tablo.4 Mevcut Durum Gürültü Seviyesi Ölçüm Sonuçları-Gece

Ölçüm Noktası	Tarihi	Ölçüm Türü	Ölçüm Sonuçları (dBA)		
			L_{eq}	L_{90}	L_{Amax}
Hassas Alıcı	21.10.2021 22.10.2021	Leq-gece	53,9	43,3	76,7

Tablo.5 Mevcut Durum Gürültü Seviyesi Ölçüm Sonuçları-IFC

Ölçüm Noktası	Tarihi	Ölçüm Türü	Ölçüm Sonuçları (dBA)			Sınır Değer WHO for Residential	
						$LeqA_{day}$ 07:00-22:00	$LeqA_{Night}$ 22:00-07:00
			$L_{eq\text{-}day}$	L_{90}	L_{Amax}	$L_{eq\text{-}day}$	$L_{eq\text{-}night}$
Hassas Alıcı	21.10.2021	Leq-gündüz	63,1	43,8	93,4	**55**	
	21-22.10.2021	Leq-gece	51,2	44,2	74		**45**

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DENEY RAPORU / Test Report

ÇEVRESEL GÜRÜLTÜNÜN DEĞERLENDİRİLMESİ VE YÖNETİMİ YÖNETMELİĞİ
Tablo-4 Endüstri tesisleri için çevresel gürültü sınır değerleri

Alanlar	$L_{gündüz}$ (dBA)	$L_{akşam}$ (dBA)	L_{gece} (dBA)
Gürültüye hassas kullanımlardan eğitim, kültür ve sağlık alanları ile yazlık ve kamp yerlerinin yoğunluklu olduğu alanlar	60	55	50
Ticari yapılar ile gürültüye hassas kullanımların birlikte bulunduğu alanlardan konutların yoğun olarak bulunduğu alanlar	**65**	**60**	**55**
Ticari yapılar ile gürültüye hassas kullanımların birlikte bulunduğu alanlardan işyerlerinin yoğun olarak bulunduğu alanlar	68	63	58
Endüstriyel alanlar	70	65	60

Gündüz: 07.00'den 19.00'a kadar olmak üzere 12 saat,
Akşam: 19.00'dan 23.00 'e kadar olmak üzere 4 saat,
Gece: 23.00'den 07.00'ye kadar olmak üzere 8 saattir.

Olmak üzere logaritmik ortalamalar alınarak toplanmış ve değerlendirilmiştir.

IFC Gürültü Rehber Dokümanı Sınır değerleri aşağıda belirtilmiştir.
Environmental, Health, and Safety (EHS) Guidelines
GENERAL EHS GUIDELINES: ENVIRONMENTAL
NOISE MANAGEMENT

Table 1.7.1- Noise Level Guidelines[54]		
Receptor	One Hour LAeq (dBA)	
	$LeqA_{day}$ 07:00-22:00	$LeqA_{Night}$ 22:00-07:00
	$L_{eq\text{-}day}$	$L_{eq\text{-}night}$
Residential;institutional;educational[55]	55	45
Industrial; commercial	70	70

Gündüz: 07.00'den 22.00'a kadar olmak üzere 15 saat,
Gece: 22.00'den 07.00'ye kadar olmak üzere 9 saattir.

Olmak üzere logaritmik ortalamalar alınarak toplanmış ve değerlendirilmiştir

2.Gürültü Ölçüm Bilgileri

2.1. Ölçüm süresi, tarihi, ölçülen parametreler

Ölçüm 21-22.10.2021 tarihinde gerçekleştirilmiştir. Ölçüm cihazı, "SV 30A SN: 22502 Akustik kalibratör" ile 94 ve 114 dBA' da kontrol edilmiştir ve cihaz fast moduna getirilerek ölçüm zamanı 15 dakika ayarlanarak 24 saat ölçüm yapacak şekilde gerçekleştirilmiştir.

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2.1.2. Ölçüm yüksekliği
Açık alanda yapılan ölçümler yansıtıcı yüzeylerden en az 3,5 metre uzakta, yerden 1,5 metre yükseklikte yapılmıştır.

2.1.3. Ölçüm metodolojisi
Ölçümler; TS ISO 1996-2 ve TS 9315 ISO 1996-1 standartlarında ve Çevresel Gürültünün Değerlendirilmesi ve Yönetimi Yönetmeliği'nde belirtilen prensiplere uygun şekilde yapılmıştır.

2.1.4. Ölçümlerde kullanılan ölçüm cihazı hakkında bilgi (cihaz seri no'su, tipi, modeli ve üreticisi)
Ölçümler; SVANTEK Marka (Tip 1), SVAN 957 SN:96068 ölçme cihazı ile yapılmıştır. Aşağıda cihaz ile ilgili teknik özellikler verilmiştir.
Cihaz, yapılan ölçümleri hafızasına otomatik olarak kaydeder. Karanlık ortamlarda aydınlatması kullanılarak ölçüm yapılabilir. Cihaz ile eşdeğer gürültü seviyesi (L_{eq}), ortalama, minimum ve maksimum gürültü seviyeleri hesaplanabilmektedir. Cihazın ölçüm belirsizliği %± 0,49 dır

2.1.5. Kalibrasyon metodu, kalibrasyon seviyeleri ve ölçüm cihazının kalibrasyon sertifikası
Cihazın ölçüm öncesi kontrolu "SV 30A SN: 22502 Akustik kalibratör" ile 94 dBA ve 114 dBA' da yapılmıştır. Kalibrasyon sertifikaları Ek 4-5'te sunulmuştur.

2.1.6. Ölçüm yapan (Musa YILMAZ) akustik konusundaki bilgi birikimi Ek-1'de, raporu hazırlayan kişinin (Kamil Erhan CAN) akustik konusundaki bilgi birikimi Ek-2'de ve raporu onaylayan kişinin (Fevzi KARAKAYA) akustik konusundaki bilgi birikimi Ek-3'de sunulmuştur.

Ayrıca ölçümü yapan kuruluşun yetki belgeleri Ek-8 'da sunulmuştur.

3. EKLER

EK 1- Ölçümü Yapan Kişinin Yetki Belgesi
EK 2- Raporu Hazırlayan Kişinin Yetki Belgesi
EK 3 - Raporu Onaylayan Kişinin Yetki Belgesi
EK 4 - Ölçüm Cihazı Kalibrasyon Belgesi
EK 5 - Ölçüm Cihazı Kalibratörü Belgeleri
EK 6 - Ölçüm Fotoğrafları
EK 7 - Sıcaklık Ve Nem Cihazı Kalibrasyon Belgesi
EK 8 -Türk Akreditasyon Kurumu Akreditasyon Sertifikası

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Appendix-D
PM_{10} Measurement Report

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AB-0425-T
10/21

İlk Basım: 03.05.2010
RP.03 / Rev.04
Rev. Tarihi: 25.09.2019
Sayfa 1 / 4

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Müşterinin Adı/ Adresi Customer Name / Address	2U1K MÜHENDİSLİK VE DANIMANLIK A.Ş. Mustafa Kemal Mahallesi, Dumlupınar Blv.9.Km Tepe Prime İş ve Yaşam Merkezi No:266 D:37 B Blok Çankaya/Ankara
Numunenin Adı ve Örnekleme Tarihi Name and Sampling Date of the Sample	21.10.2021 – 22.10.2021 (Pm10)
Proje Adı ve No Name and Number of the Project	Pm10 Örneklemesi – P-26928/21
Numunenin Kabul Tarihi Date of Sample Acceptance	22.10.2021
Açıklamalar Remarks	Eskişeir ili Odunpazarı ilçesi'nde''Odunpazarı Belediyesi Engelsiz Yaşam ve Otizm Merkezi Projesi' kapsamında 1 noktada 24 saat PM10 ölçümü gerçekleştirilmiştir.
Deneyin Yapıldığı Tarih Date of the Test	22.10.2021-25.10.2021
Raporun Tarihi ve Sayfa Sayısı ***Number and date of the Pages of the Report***	22.10.2021– 4 sayfa

Deney laboratuvarı olarak faaliyet gösteren SEGAL Çevre Ölçüm ve Analiz Laboratuarı Müh. Müş. Proje Hizm. San. Tic. Ltd. Şti. TÜRKAK'tan AB-0425-T ile TS EN ISO IEC 17025 standardına göre akredite edilmiştir. SEGAL Çevre Ölçüm ve Analiz Laboratuarı Müh. Müş. Proje Hizm. San. Tic. Ltd. Şti. accredited by TÜRKAK under registration number AB-0425-T for TS EN ISO IEC 17025 as test laboratory"
Türk Akreditasyon Kurumu (TÜRKAK) deney raporlarının tanınırlığı konusunda Avrupa Akreditasyon Birliği (EA) ile Çok Taraflı Anlaşma ve Uluslararası Laboratuvar Akreditasyon Birliği(ILAC) ile karşılıklı tanıma anlaşması imzalamıştır. Turkish Accreditation Agency (TURKAK) is a signatory to the European co-operation for Accreditation (EA) Multilateral Agreement (MLA) and to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA) for the recognition of test reports
Deney ve/veya ölçüm sonuçları, genişletilmiş ölçüm belirsizlikleri ve deney/ölçüm metotları takip eden sayfalarda verilmiştir. The test and /or easurements results, the uncertainties with confidence probability and test methods are given on the following pages which are part of this report.

Raporu Hazırlayan Prepared by	Raporu Onaylayan Confirm by
Kamil Erhan CAN Kimyager	Fevzi KARAKAYA Laboratuar Müdürü

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A. GİRİŞ

Proje kapsamında 1 nokta 24 saat süre ile Pm10 ölçümleri gerçekleştirilmiştir Alınan deney sonucu, sadece ölçüm sırasındaki proses koşullarıyla ilgili olup yapılmış olan ölçümler neticesinde elde edilen sonuçlar 2872 sayılı Çevre Kanunu'nun ilgili hükümleri gereğince 03.07.2009 tarih ve 27277 sayılı Resmi Gazete' de yayımlanarak yürürlüğe giren Sanayi Kaynaklı Hava Kirliliğinin Kontrolü Yönetmeliği (S.K.H.K.K.Y.) ve 20.12.2014 tarih ve 29211 sayılı Resmi Gazete' de yayımlanarak yürürlüğe giren Sanayi Kaynaklı Hava Kirliliğinin Kontrolü Yönetmeliğinde Değişiklik Yapılmasına Dair Yönetmelik çerçevesinde değerlendirilerek sadece sınır değerlerle karşılaştırma yapılmış olup bu emisyon raporu hazırlanmıştır.

Sanayi Kaynaklı Hava Kirliliğinin Kontrolü Yönetmeliği, sanayi ve enerji üretim tesislerinin faaliyeti sonucu atmosfere yayılan is, duman, toz, gaz, buhar ve aerosol halindeki emisyonları kontrol altına almak; insanı ve çevresini hava alıcı ortamındaki kirlenmelerden doğacak tehlikelerden korumak; hava kirlenmeleri sebebiyle çevrede ortaya çıkan umuma ve komşuluk münasebetlerine önemli zararlar veren olumsuz etkileri gidermek ve bu etkilerin ortaya çıkmamasını sağlamayı amaçlamaktadır

B. ÖLÇÜM YAPILAN BÖLÜM, ÖLÇÜM PARAMETRELERİ, ÖLÇÜM YÖNTEMİ VE ÖLÇÜM CİHAZI VE SONUÇLARI

Ölçüm yapılan yerler ve koordinatları Tablo -1 de verilmiştir.

Tablo -1: Pm10 Ölçümü Yapılan Yerler

No	GPS Koordinatı		Ölçüm Tarihi
PM10	39.756224	30.536354	21.10.2021-22.10.2021

PM10 Ölçüm Noktalarının Uydu Görüntüsü

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AB-0425-T
10/21

DENEY RAPORU / Test Report

D. ÖLÇÜM SONUÇLARI VE DEĞERLENDİRİLMESİ

Projede, emisyon ölçüm yerleri, Bakanlık tarafından onaylanmış standartlara göre, teknik yönden hatasız ve ölçüm için gerekli bağlantıları yapmaya imkan verecek şekilde seçilmiştir. Emisyon ölçümleri, sürekli rejimde çalışır halde ve izne esas olan en büyük yükte yapılmış olup ölçümlerde kullanılan cihazlar ve metotları Türk Standartlarına ve EPA normlarına uygundur.

PM 10 ÖLÇÜMLERİ;

MCZ LVS 1 PM 10 partikül madde ölçüm cihazı ile çapları 10 mikrondan küçük parçacıklar gravimetrik metot ile filtre kağıdı üzerinde TS EN 12341 standardına uygun olarak tutulur. MCZ LVS 1 ölçüm cihazı ise pompa kontrollü, zaman ve hacim ayarlı, elektrik ile çalışan ortamda toz örneklemesinde kullanılan ölçüm cihazıdır.
MCZ LVS 1 ölçüm cihazı kullanırken, örnekleme yapılacak filtre kâğıtları, araziye gitmeden önce laboratuarın 19-21°C sıcaklığa ve %45-50 bağıl neme sahip olduğu koşullarda klima yardımıyla 48+12 saat boyunca şartlandırılır. Şartlandırılma sonunda filtre kâğıtları hassas terazide tartılarak tartım sonuçları kaydedilir, filtre kâğıtları araziye gönderilecekleri temiz petri kaplarına yerleştirilir ve örnekleme noktasına götürülür.

Örnekleme cihazları, her türlü hava koşullarında kolayca ulaşılabilecek bir yer olarak seçilen örnekleme noktasına taşınır. Cihaz hava akımını engelleyebilecek herhangi bir engelden en az 30 cm uzaklıkta düzgün bir alana yerleştirilir ve cihaz kullanma talimatında belirtilen şekilde ölçüm ve örnekleme yapılır.

Pompa durdurulduktan sonra filtre kağıdını cımbız yardımıyla çıkartarak, daha önce içerisinden çıkarılan petri kabına yerleştirip, tartılmak üzere laboratuara gönderilir.
MCZ LVS 1 kullanılan cihazdan elde edilen filtre kağıdı laboratuarda 19-21°C sıcaklığa ve %45-50 bağıl neme sahip olduğu koşullarda klima yardımıyla 48+24 saat boyunca şartlandırılıp, hassas terazide tartılarak tartım sonuçları kaydedilir.

PM 10 konsantrasyonu (C) µg/m^3 olarak aşağıdaki formül ile hesaplanır:
$C = 1000 (M_2-M_1)/ (V)$
M_2= Filtre kağıdının deneyden sonraki ağırlığı, (mg)
M_1= Filtre kağıdının deneyden önceki ağırlığı, (mg)
V= Çekilen gaz hacmi, (m^3)
$V = 60 * Q_{act} * t / 1000$
t = Zaman, saat
PM 10 ölçümü için çekiş debisi 2,3 m^3/h'dir.

Kullanılan cihazların kalibrasyon belgeleri Ek-4'de verilmiştir

PM10 Ölçüm Sonuçları

Tablo – 3: PM10 Ölçüm Sonuçları

Ölçüm Yapılan Bölüm	Ölçüm Tarihi	PM 10 Ölçüm Sonucu (µg/m3)
PM10	21-22.10.2021	43

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AB-0425-T
10/21

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E. EKLER
Ek 1.Türk Akreditasyon Kurumu Akreditasyon Sertifikası
Ek 2 Ölçüm Fotoğraflar
Ek.3 Ölçüm Hesabında Kullanılan Formüller
EK.4 Cihaz Kalibrasyon Belgesi

Laboratuar, yetkili personeli tarafından alınmayan ve/veya uygun koşullarda gelmeyen numunelerden, teknik ve hukuki olarak sorumluluk kabul etmemektedir.
Laboratuarımız tarafından alınmayan numunelere ait ölçüm belirsizliği değerleri, numune almadan kaynaklanan belirsizlik değerleri dahil edilmeden belirtilmiştir.

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Appendix-E
Chance Find Procedure

INTRODUCTION

This document presents the Chance Find Procedure for 'Odunpazarı Municipality Rehabilitation Centre for Autistic and Disabled People Project' (hereinafter referred to as 'Project') and is prepared by 2U1K Muhendislik ve Danismanlik A.S. for " Odunpazarı Municipality " (hereinafter referred to as 'Borrower / Project Owner').

This document is intended to avoid potential impacts of the Project on any cultural heritage during land preparation works, including excavation. At the baseline studies, field survey and literature review were conducted for the Project and its vicinity to identify potential archaeological and immovable cultural properties. No archaeological or immovable cultural property was encountered during the study.

This Procedure is a part of the general package as an annex to the Environmental and Social Management Plan (ESMP) developed for the Project.

SCOPE

Types of Cultural Heritage Covered by This Procedure

Tangible Cultural Heritage

Tangible (physical) cultural heritage refers to movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance.

ROLES AND RESPONSIBILITIES

Roles	Responsibilities
Contractors	• Compliance with the Chance Find Procedure provided in contractor agreements • Provide appropriate training and information to the worksite personnel who work in the projects and who may disturb the cultural heritage so that they understand their responsibilities for cultural heritage
Project Owner	• Ensure compliance of the project with the Project Standards and other requirements given in this Plan • General responsibility for the scope and implementation of the Plan • Development, monitoring and revision of this Plan • Fulfillment of cultural heritage evaluation processes • Ensure that the operations do not disturb cultural properties and sites without the approval of the relevant authority • Investigation, reporting and monitoring of unauthorized damages to the worksite as well as of procedure violations • Management of amendments to laws or policies • Coordination with the organizations involved in the implementation and other stakeholders
All Workers	• Learn about the Chance Find Procedure through induction training and any other training provided

PROJECT STANDARDS

- Law on the Conservation of Cultural and Natural Properties (LCCNP) (No: 2863),
- World Bank Protection Policy on Physical Cultural Resources (OP/BP 4.11),
- Convention Concerning the Protection of the World Cultural and Natural Heritage (World Heritage Convention).

CHANCE FIND PROCEDURE

Initial Approach Adopted by the Contractor

- Action 1: Immediately stop all construction works in the vicinity of the chance find, in case of discovery of archeological finds;
- Action 2: Immediately notify the project manager and/or environmental department;
- Action 3: Take photographs or make technical drawings;
- Action 4: Record the location of the location by keeping all remains in their position (without moving them);
- Action 5: Prevent damage to or loss of movable objects by encircling the area;
- Action 6: Contact an archaeologist from a local university for guidance;
- Action 7: Prepare the Chance Find Form (Annex 1).

Approach Adopted by the Archeologist

Based on the description of the find, the archaeologist will make recommendations on actions to be taken by phone/e-mail or visit. The Project team will take into account the following possible strategies, if the archaeologist(s) confirm(s) the presence of archaeological finds/remains/sites:

Strategy 1: Avoidance by partial or full project redesign or relocation

In case of any archeological find or discovery, the Project Owner will provide the relevant information to authorities. This responsibility will apply even if the project is redesigned or relocated. In any case, the relevant governmental body will be informed of the archaeological find or discovery.

Strategy 2: Implementation of worksite protection measures

This option includes the implementation of site protection measures such as fencing or blockage. As per LCCNP No. 2863, any archeological find is the property of the Republic of Turkey, and governmental bodies will decide on the geographical scope and implementation of site protection measures.

Strategy 3: Rescue or emergency excavation

If the Project Owner fails to relocate or redesign the Project, this may require rescue or emergency excavation works. If notification is stipulated by LCCNP, an application will be lodged to governmental bodies. If an official application is lodged, the relevant Regional Board will allowed to make a decision.

After the permit is obtained, archaeological excavations will be performed with the attendance of scientific consultants from the archeological departments of universities. Following the completion of archaeological excavations, the results will be submitted to relevant governmental bodies for the final decision to be taken for the progress of the Project.

Procedure for the Discovery of Potential Human Remains

Identification of human remains is very clear in terms of graves or burial sites. If a grave or burial site is found, the procedures to be followed are not different from the procedure applicable to archaeological finds as per Article 6 of LCCNP. Modern burials or forensic human remains will not be addressed within the scope of LCCNP.

KEY PERFORMANCE INDICATORS

The key performance indicators to be USED during the implementation of this Procedure are set out below.

Table 12-1. Key Performance Indicators (KPIs)

No	KPIs	Target	Monitoring Measure
1	Non-conformities reported during the year with respect to key management controls identified in this Plan	Minimization of reported non-conformities, aiming at zero	Database Reporting Inspection Reports
2	Number of complaints lodged by local communities during the year regarding cultural heritages	Investigation of complaints about cultural heritage (disrespect, destruction, removal, sale of artefacts) and fulfillment of relevant actions. • Provision of prompt response to complaints from local communities regarding the misbehavior of personnel regarding cultural properties	Database Grievance Mechanism Records Reporting

ANNEX – 1 Sample Chance Find Form

Place:	Chance Find No:	Date:
Location Data: **Coordination:** **Elevation:** **Brief Area Description:**		
Chance Type:	[ ]Archaeological Items [ ]Metal Finds [ ]Terracotta Finds [ ]Pottery Shards [ ]Glass Finds	[ ]Sculpture etc. [ ]Human / Animal Bone [ ]Unidentified
Temporary Measures		
Photograph		
Discoverer's Name-Last Name:		
Signature:		

Appendix-F
Official Letter Received From the Ministry of Culture and Tourism

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T.C.
KÜLTÜR VE TURİZM BAKANLIĞI
Kültür Varlıkları ve Müzeler Genel Müdürlüğü
Eskişehir Kültür Varlıklarını Koruma Bölge Kurulu Müdürlüğü

PATARA

Sayı : E-42244183-168.01.09-2253819

Konu : Eskişehir İli, Odunpazarı İlçesi, Çankaya Mahallesi, 24806 ada, 1 parselde, Engelsiz Yaşam ve Otizm Merkezi yapılmasına esas imar planı çalışması talebi hk. (26.00.5909)

DAĞITIM YERLERİNE

İlgi : Odunpazarı Belediye Başkanlığının (Etüt Proje Müdürlüğü) 10.02.2022 tarih ve 37737 sayılı yazısı ve ekleri.

Eskişehir İli, Odunpazarı İlçesi, Çankaya Mahallesinde, Odunpazarı Belediyesine ait, tapunun 24806 ada, 1 parselde kayıtlı taşınmazda, Engelsiz Yaşam ve Otizm Merkezi yapılmasına ilişkin imar planı çalışmasına esas 2863 sayılı Yasa kapsamında görüşümüzün bildirilmesi ilgi yazı ile talep edilmektedir.

Bahse konu taşınmazlara ilişkin Müdürlüğümüz arşivinde herhangi bir kültür varlığı kaydı bulunmamaktadır.

Ayrıca, Müdürlüğümüz uzmanlarınca yerinde yapılan inceleme sonucu, taşınmazların yüzeyinde de herhangi bir korunması gerekli kültür varlığına rastlanmamış olup; alanda yapılacak uygulamalar sırasında herhangi bir korunması gerekli kültür varlığına rastlanması halinde 2863 sayılı Kanunun Haber Verme Zorunluğu başlıklı 4. Maddesi hükmü uyarınca en yakın Müze Müdürlüğüne veya Mülki İdare Amirliğine haber verilmesi koşuluyla söz konusu taşınmazlarda imar planı ve uygulaması yapılması talebinin ilgili idarelerce değerlendirilmesi gerekmektedir.

Gereğini ve bilgilerinizi arz ve rica ederim.

Fatma Tülay ÇERÇİ
Koruma Bölge Kurulu Müdür V.

Dağıtım:

Gereği:
Odunpazarı Belediye Başkanlığına

Bilgi:
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Appendix-G
Traffic Measurement Letter

This project is co-funded by the European Union, the Republic of Turkey and the World Bank
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T.C.
ESKİŞEHİR BÜYÜKŞEHİR BELEDİYE BAŞKANLIĞI
Ulaşım Dairesi Başkanlığı

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ODUNPAZARI BELEDİYE BAŞKANLIĞINA

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İlgi yazı ile Sürdürülebilir Şehirler Projesi-II Ek Finansman kapsamında Dünya Bankası tarafından kredilendirilen Odunpazarı Belediyesi'ne ait Engelsiz Yaşam ve Otizm Merkezi projesini gerçekleştirebilmek için çevresel ve sosyal etkileri incelenerek rapor hazırlanması gerektiği bildirilmiştir. Bu kapsamda Kartopu Caddesi ile Gökçekaya Sokak'ın kesiştiği noktadan ve /veya Altay Caddesi'nin Şehit Sabutay Alkan Sokak ile kesiştiği noktadan trafik sayımları istenmiş olup söz konusu bölgelerde trafik sayımları bulunmamaktadır.

Bilgilerinize rica ederim.

Şenol KARA
Büyükşehir Belediye Başkanı a.
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Appendix-H
Guidance to COVID-19 Outbreak Management and Working

MEASURES TO BE TAKEN IN CONSTRUCTION SITES

Each construction site work has its own characteristics such as geographical conditions, accommodation, works done etc. The purpose of the measures to be taken at the construction sites within the scope of COVID-19 is to prevent the cases, but if there are some cases, it is to prevent the spread of the pandemic. Another important issue that should be taken into consideration is that there may be some employees who have been infected by contact yet do not show any symptoms, although no COVID-19 case has been detected so far among the employees.

Basics to be Considered When Taking Measures Regarding the Pandemic

- The main mode of transmission of COVID-19 infection is from person-to-person transmission. This transmission takes place via the droplets coming out of the mouth or nose of the person carrying the virus when talking, sneezing and coughing.
- Transmission can also take place through contact of mouth, nose or eyes with the hands that come into contact with the surfaces, which are contaminated by coughing or sneezing.
- It is essential to take measures against the transmission through droplets, which is the main mode of transmission.
- The disease can also progress on some of the infected people without any symptoms and these people play an important role in spreading the disease.
- Whether s/he shows symptoms or not, the person carrying the virus can transmit the disease to the other people in a short time.
- The course of the disease is often more severe in people who have high blood pressure, diabetes, heart and chronic lung diseases, and those aged 65 and over.

Basic Principles to be Considered for the Measures

- Personal hygiene and environmental cleanliness should be observed and strictly followed.
- People with symptoms of diseases should be identified and isolated in the workplace.
- People in contact with the diseased should be tracked and close contacts should be handled in accordance with the COVID-19 guide.
- When an employee distressed with fever, cough or respiratory condition is found, the occupational healthcare unit and the provincial/district health authority should be contacted.

Measures to Take and Practices to Perform

Assigning a Responsible Person for The Purpose of Controlling the COVID-19 Pandemic In The Workplace

This person should preferably be a physician or healthcare staff assigned by the "Occupational Health and Safety Committee". If this is not possible, an employee to be determined by the employer or its representative should be trained and appointed regarding the COVID-19 disease.

Primary tasks:

- Following up the cleaning and disinfection measures to be taken in the workplace.
- To prevent people, who are not in charge at the construction site, from entering into the working areas except for the obligatory cases,
- To have the posters, which are issued by The Ministry of Health regarding the protection against COVID-19, hung on visible places and to get leaflets distributed to employees,
- To daily observe the employees in order to determine those who have fever, cough and difficulty in breathing,
- To determine the notification method (phone, radio, applying to a predetermined location etc.) that will allow employees, who have fever, cough and difficulty in breathing, to inform herself/himself,
- To contact with the occupational healthcare unit and the provincial/district health authority when a suspected case of COVID-19 arises.

Taking Measures to Prevent COVID-19 From Transmitting Amongst Employees in the Workplace

- The followings should be taken into consideration when using the service vehicles:
- Ensuring the frequent cleaning and hygiene of the service vehicles, especially for the frequently touched surfaces,
- Putting hand sanitizers at the entrance of the service vehicles,
- Planning the transportation capacity of the services vehicles considering the social distancing,
- Preventing employees, who return from domestic travel, from going back to work without undergoing a health check.
- Making arrangements to place hygiene materials

- Temporarily not using systems such as fingerprint reading that may increase the risk of infection and using contactless systems where possible,
- Maintaining distance and preventing crowd of people by making pass markings pursuant to social distancing rules
- Taking temperature of employees by using non-contact thermometer when entering into the workplace
- Getting in touch with the occupational healthcare unit and the provincial/district health authority when an employee distressed with fever, cough or difficulty in breathing is found, by preventing contact with other employees.

Working Environment

- Updating the risk assessment and emergency plans by considering COVID-19 pandemic,
- Reviewing the methods and arrangements of working by considering social distancing rules and making new arrangements as per these rulers,
- Planning and monitoring up interactions, including the rest and launch breaks, amongst the employees in a manner that the social distance will be maintained,
- Keeping the number of employees working at the same time in the work area at the minimum level, planning to ensure social distance among employees, and preferring the methods, such as working remotely or in rotation, if possible
- Ensuring that the working environment is being properly and adequately ventilated, and cleaned daily by using water and cleaning agents,
- Especially, cleaning the surfaces (door handles, faucets, handrails, elevators, frequently touched buttons such as lighting systems, phone handsets, TV remotes) that are frequently in contact with hands as well as the toilets and sinks in common areas at least twice a day by using diluted bleach or chlorine tablets* base on the product instructions
- In order to ensure the hygiene of the working environment and all of the equipment used, frequently cleaning the devices with displays and their related components (keyboard, mouse, commonly used phone devices, intercom, microphone etc.) by using a solution including 70% alcohol,
- Informing and encouraging the employees to clean the commonly used equipment before using,
- Not using the elevators where possible, in obligatory cases restricting the number of people using the elevators according to the social distancing rules and ensuring that the people do not face to each other inside the elevators,

- Keeping enough number of garbage bins, which do not require touching to use, in the working environment,
- Ensuring that there are enough number of washrooms based on number of employees,
- Keeping sufficient personal hygiene materials in the washrooms, paying particular attention to the implementation of personal hygiene rules before and after using such places, and frequently cleaning these places by using diluted bleach or chlorine tablets* based on the product instructions,
- Ensuring that the cleaning staff uses masks and gloves,
- Ensuring that the used masks and gloves are thrown to the garbage bins in the workplace and that the hands are sanitized, Ensuring that the hands are being washed by using water and soap for at least 20 seconds,

  and that the hands are sanitized by using alcohol based hand antiseptics in case there is no water or soap,
- Getting in touch with the occupational healthcare unit and the provincial/district health authority when an employee distressed with fever, cough or difficulty in breathing is found,
- Paying particular attention to the personal hygiene of the personnel, who is in charge of cleaning and disposing the wastes, and having them to use appropriate personal protective equipment,
- Ensuring that the meetings and trainings are held obeying the "57. MEASURES TO TAKE DURING IN HOUSE MEETINGS WITH LOW PARTICIPATION" set forth in the guidelines,
- Holding the meetings and trainings, which cannot be postponed due to legal obligations, remotely or by teleconferencing,

All Kinds of Closed Areas Such As Office, Meeting Room etc.

- Keeping hand sanitizers at the office entrance and ensuring everyone uses it,
- Ensuring that masks are used in the office environment,
- Arranging working and waiting areas based on the social distancing rules
- Keeping the number of people present in the office as low as possible.
- Ventilation of buildings with central ventilation systems should be arranged in such a way that 100% natural air circulation is ensured. Also, maintenance of the ventilation systems should be performed and filters should be changed according to the manufacturer's recommendations. One should comply with the “Measures to be Taken Regarding the Air Conditioning Systems within the scope of COVID-19 _bookmark205”

set forth in the “Pandemic Management and Working Guidelines” issued by the Ministry of Health.

- Fans should not be used.

Kitchens, eating halls and rest areas

- Placing hand sanitizers at the entrance of kitchens, eating halls and rest areas,
- Considering the social distancing and hygiene rules in kitchens, eating halls and rest areas,
- Making arrangements to ensure that the distance between the tables and chairs is 2 meter in the eating halls,
- In order to easily follow up "coming into contact situation": eating times should be arranged based on the groups and the same people should eat on the same tables, and similar rules should be implemented during tea breaks,
- Ensuring 2-meter-distance between the employees in the case where they are eating their meals other than eating halls, preventing them to share their food, giving employees victuals where possible,
- Ensuring that there are enough number of washrooms based on number of employees and increasing the number of hand washing facilities,
- Making arrangements that allow the implementation of personal hygiene rules such as ensuring that the people wash their hands with plenty of water and soap for at least 20 seconds before and after eating and that they use disposable towels,
- Spices, toothpicks, salt, spoons, forks, knives, glasses, plates, etc. Providing people with disposable materials,
- Giving employees victuals where possible,
- Ensuring that eating hall staff act according to the personal hygiene rules and use appropriate personal protective equipment (medical masks, caps, gloves)
- Ensuring that the working environment is being properly and adequately ventilated, and cleaned daily by using water and cleaning agents,
- Especially, cleaning the surfaces (door handles, faucets, handrails, elevators, frequently touched buttons such as lighting systems, phone handsets, TV remotes) that are frequently in contact with hands as well as the toilets and sinks in common areas at least twice a day.

Dorm Rooms

- Putting hand sanitizers at the entrance of dorm rooms,
- Considering the social distancing and hygiene rules in the dorm rooms,

- Placing the beds or bund beds 2 meters apart in the dorm rooms,
- Placing the adjacent beds or bunk beds in such a way that the people will sleep head to toe, and applying the same rule for the upper and lower parts of the bunk beds,
- Ventilating the dorm rooms regularly and adequately,
- Especially, cleaning the surfaces (door handles, faucets, handrails, elevators, frequently touched buttons such as lighting systems, phone handsets, TV remotes) that are frequently in contact with hands as well as the toilets and sinks in common areas at least twice a day,
- Ensuring that there are enough number of toilets / washrooms based on number of employees,

Locker Rooms

- Disinfecting all locker rooms on a daily basis, Disinfection should be performed by wiping the surfaces, which come in to contact with hands and body, using a disinfection product.
- Keeping hand sanitizers recommended by the Republic of Turkey Ministry of Health in each locker room,
- Ensuring that the employees entering into the locker rooms with their masks and that they do not taking out their masks,
- Limiting the time to stay in locker rooms,
- Taking precautions to keep social distancing when entering into and exiting locker rooms,
- Ensuring that people using locker rooms by turns in order to decrease crowd of people, Determining the number of people in locker rooms by maintaining the social distancing,
- Not allowing people to eat or drink in locker rooms,
- Not allowing people to put their shoes on lockers,

Toilets, washrooms and Showers

- In order to maintain social distancing when using urinals, urinals should be selectively closed off so that people do not stand next to each other.
- Always keeping soap, toilet paper and paper towel in washrooms,
- Cleaning the toilets as well as the surfaces, such as door handles, faucets, handrails that are frequently in contact with hands, more often than usual, Frequently cleaning the door handles using disinfecting agent. Making arrangements to have the doors opened and closed without touching where possible,
- In order to maintain social distancing and preventing contact when using adjacent sinks, sinks should be selectively closed off or separators should be installed,

- No hand dryers should be used other than the ones operating with hepa-filter airflow,
- Posting informative banners in the washrooms.

Precautions to Take When There Are People With Complaints (such as Fever, Cough or Respiratory Distress) Compatible with COVID-19 Among Employees At The Workplace

- Immediately isolating those people showing the symptoms from other employees, and having them wear medical masks and apply to the workplace health unit,
- Managing the people, who came into contact with the person tested positive for COVID-19, according to the COVID-19 guide of the Ministry of Health and preventing these people from contacting with other employees,
- Keeping the dorm room, which is used by the employee tested positive for COVID-19, empty for 24 hours and ventilating it in the meantime, and thoroughly cleaning the room with water and cleaning agents,
- Using gloves and medical masks when cleaning the room where the person tested positive for COVID-19 stays, cleaning all surfaces that may be contaminated with respiratory secretions or body excreta using diluted bleach or chlorine tablet based on the product instructions.
- For surface cleaning and disinfection; surface disinfecting agents containing active ingredients that have been proven to be effective against viruses and that have a 'Biocidal Product License' issued by the Ministry of Health can be used,

http://cbs.cevresaglik. gov.tr/cevresaglik/Biyosidal/Dezenfektan.aspx

* Preparing the water to be used when cleaning with bleach or chlorine tablet:

- It is prepared by adding half a cup of sodium hypochlorite containing bleach, which is diluted with a ratio of 1/100 (Sodium hypochlorite Cas No: 7681-52-9), to 5 liters of water
- If chlorine tablet will be used when cleaning, the instructions shown on the product tag should be taken into consideration.

COVID-19 Precautions To Take In The Special Education and Rehabilitation Centers of The Republic of Turkey Ministry of Health

Special education and rehabilitation centers provide individualized educational services for the children and youth who are included in the scope of special education and who has autism spectrum disorder, mental disability, speech and language disorders, hearing loss, vision loss, orthopedic disorders, reading (dyslexia) and writing (dysgraphia) difficulties, difficulties in mathematical (dyscalculia) operations (special learning disability), traumatic brain injury , cerebral palsy, having more than one inability. Since the special education and rehabilitation centers are the places where the risk of COVID-19 transmission is high due to the working

conditions, it is an obligation for employees, students and families of disabled to be careful about the protection and control measures in order to reduce the infection risk. Protection and control principles and practices suggested to reduce infection risk in special education and rehabilitation centers are presented below.

- The “Information Form and Commitment”, which is included in the attachment and which was previously prepared, should be signed by parents/guardians during the stage of re-admission.
- Banners (social distancing, mask usage, hand washing) regarding the precautions need to be taken within the scope of COVID-19 should be posted to the appropriate places at the entrances of special education and rehabilitation centers.
- Date and time that students and personnel come to the institution should be recorded.
- In this institutions, the number of the disabled students in the groups should be

  determined in accordance with the social distancing rules based on the classroom / group room.

Precautions to be Taken In The Service Vehicles

- Service vehicles, especially the surfaces which are touched frequently, should be cleaned after each use using water and cleaning agents.
- The number of person to be transported should be planned by considering the transportation capacity of the vehicle as well as the social distancing rules in the vehicles.
- Fever, cough, runny nose, respiratory distress symptoms should be examined amongst the students, personnel and parents that will use service vehicles, and those who show symptoms and have fever should not be allowed to get into the service vehicles.
- Hand sanitizers should be kept in the vehicles.
- Drivers, vehicle attendants and guardians should wear masks. Students age 2 and older should wear a mask if possible.

Precautions to be Taken in the Institution

- Non-contact thermometer, sufficient number of masks, cologne with at least 70% of alcohol, liquid soap, hand sanitizer and disinfecting agents should be available in the institutions.
- Trash bins with step-on foot pedal and lid should be used for to throw the used masks and gloves.
- Hand sanitizers should be placed at the entrance of the institutions as well as other appropriate places.

- In the institutions, the places to keep hand sanitizers should be inaccessible to disabled students and these places should be monitored by educators.
- Temperature checks should be done for all of the personnel, disabled students and visitors when entering into the institutions. People with symptoms such as a fever higher than 38 oC, runny nose, respiratory distress, those who were tested positive for COVID-19 or who contacted with a COVID-19 positive person, should not be allowed inside and should wear masks and they should be referred for evaluation with respect to COVID-19.
- All people entering into the institution should be asked to wear a mask.
- School counselors / psychologists should carry out studies to inform and raise awareness of guardians and disabled students regarding mask use, individual hygiene, social distancing rules. All of the personnel and disabled students should wear their masks according to the mask wearing rules, and the masks should be changed as they get dampened or dirty. Hand sanitizer should be used when wearing a mask and afterwards.
- All of the students and employees should be trained for hand hygiene. The situations, under which the hands should be washed, and the topics such as how to wash hands should be explained in detail.
- Hands should be washed washed by using water and soap for at least 20 seconds. If the hands are not visibly dirty and if no soap or water is available, hand sanitizers can be used.
- Disabled students should be supervised to prevent them from swallowing hand sanitizer after each use. Personnel should help disabled students, who are not able to wash their hands on their own, and afterwards, personnel should wash their own hands. Banners showing the steps to wash hands should be displayed in the washrooms.
- If possible, the same students and the same personnel should be present in the classrooms/rooms. The number of students in the classrooms/rooms should be planned to decrease contact.
- Group meetings or activities during which different classes come together should be avoided and visitors should not be allowed.
- It should be ensured that disabled persons sit in their classrooms/rooms at least 1.5 meters apart. In order to decrease the transmission caused by speaking, coughing, sneezing, the tables should be arranged in such a way that they will face the same direction and that the children do not sit face to face.
- Support training rooms should be ventilated with fresh air as much as possible by opening the doors and windows after each training.
- Course materials, tables and chairs, wheelchairs, which are used commonly, as well as other instruments and equipment should be disinfected after each individual use.
- Materials like play dough, finger paints, blowing sticks, notebooks, crayons etc. should be specific to each student.

- Single use roller stretcher covers should be used for the stretchers or mattresses used in the support training rooms for the physically disabled students; hands should be washed or sanitized in the cases where there is a need for contact with physiotherapist.
- Masks and face shields should be used in the cases where there is a need for a close contact with the disabled students.
- It should be ensured that disabled students and guardians, who are waiting for their education time in the institutions, will wait in the appropriate areas that are arranged as per the social distancing rules, and in the open air, if possible.
- The social distance among people should be at least 1 meter in the communal areas like eating rooms, libraries, masjid, canteen etc, if any.
- Services should be provided in the rooms/areas, where the personnel works, as well as in the classrooms, where the educators give individual or group education. in such a way that the social distance will not be less than 1 meter.
- The places such as conference halls, gyms etc., where mass events take place, should not be used within this period. If it is necessary to use such places, arrangements should be made based on the social distancing rules. Necessary cleaning and disinfection works should be performed after each use.
- Use of elevators should be restricted. The number of people to be allowed in the elevator should be equal to one-third of the capacity of the elevator and this number should be shown at the entrance of the elevator. In order to maintain social distance in the elevator, the points, where people should stand, should be shown with markings on the ground, with a distance of at least 1 meter.
- The toilets and washrooms of institutes should be equipped with liquid hand soap and paper towel, and such places should be periodically cleaned. Faucets as well as soap and paper towel dispensers to be used in the washrooms should be of automatic touchless type if possible.
- Couriers, cargo agents etc. should not be allowed to enter into the buildings, the delivery process should take place outside.
- Institutions should guide disabled students and their families in terms of the precautions to be taken, personal hygiene, social distancing etc.
- Precautions regarding wearing masks, hygiene and maintaining social distancing should be followed in canteens, buffets etc, if any, in the institutions, and disposable cups, plates etc. should be used in such places. When rendering these services, "Precautions to be Taken in Buffets, Canteens and Dealers Within the Scope of COVID-19" issued by The Ministry of Health should be followed.

Precautions to be Taken Regarding The Personnel Who Work in the Institutions

- Personnel should be informed regarding the transmission of COVID-19 as well as the ways of protection from the virus. It should be ensured that the personnel will be careful about the symptoms and that they should contact institution's management when they feel sick.
- Temperature of the personnel should be measured when entering into the institution. Personnel with symptoms such as a fever higher than 38 C, runny nose, respiratory distress, those who were tested positive for COVID-19 or who contacted with a COVID-19 positive person, should not be allowed inside and should wear masks and they should be referred for evaluation with respect to COVID-19.
- Personnel should keep the social distance among themselves and students, and at least 1 meter distance should be maintained. The situations involving close contacts with students such as handshaking, hugging etc. should be avoided.
- Hands should be washed by using water and soap for at least 20 seconds. If there is no water and soap, hand sanitizers should be used.
- Eyes, mouth or nose should not be touched with hands.
- As COVID-19 can easily be transmitted through droplets due to the special conditions of the students, personnel should wear medical masks and face shields when necessary.
- Disposable gloves should be used during toilet cleaning of the disabled students. The gloves should be thrown into garbage bins and hands should be washed with water and soap.

Precautions to be Taken Regarding The Disabled Students:

- Trainings about wearing a mask and maintaining social distance should be given to the students during the pandemic. However, the students should not be forced in this respect. Education personnel should wear a medical mask and they should use face shields when necessary (in the cases where there is a contact less than 1 meter and more than 10 minutes).
- Disabled students should be trained for hand hygiene. The situations, under which the hands should be washed, and the topics such as how to wash hands should be explained in detail.
- Hands should be washed washed by using water and soap for at least 20 seconds. If the hands are not visibly dirty and if no soap or water is available, hand sanitizers can be used.
- If the diaper of a disabled student is to be changed, first, the hands should be washed with water and soap, and the diaper should be changed at a separate location by using Personal Protective Equipment (apron, medical mask, face shield/goggles, gloves should be worn, respectively). After changing diaper, the area should be cleaned and the Personal Protective Equipment should be taken out in the following order; gloves, face shield/goggles, apron, medical mask. Hands should be washed with water and soap. After

each use, face shields/goggles should be disinfected using 70% alcohol, and if fabric apron is used, it should be washed at least 60 oC.

- In the institution, when the clothes of disabled students get dirty, they should be given to the family in a plastic bag and washed in the washer at least 60 oC.
- It should be ensured that disabled students wash their hands before and after using toilets, and that particular attention should be shown that they use toilets one by one, and toilets should be cleaned and disinfected after each use. It should be ensured that the lid of the toilet bowl is closed before flushing.
- When it is determined that there is a disabled student with COVID-19 symptoms and/or suspected of being sick in the institution;
    - Disabled student and those who contacted him/her should be isolated as soon as possible.
    - An isolation room or are should be arranged and the sick person should be isolated with an educator, who is using personal protective equipment, in that area.
    - It should be ensured that the families of the disabled students should be contacted and that they apply to health institution.
    - After the sick person left the institution, the isolation room/area should be cleaned and ventilated according to the rules.
    - Test results and diagnosis should definitely be followed up by the institution. Until the test results are obtained, the contact of the students and educators in that classroom/group room with the other people should be restricted. The management of contact people should be performed by provincial/district health directorates in line with the COVID-19 Guide of the Ministry of Health.

Precautions to be Taken in the Institution With Respect to Cleaning, Disinfection and Ventilation

- The general surface cleaning in special education and rehabilitation centers as well as general cleaning of the rooms (floor, doors, windows etc.) should be carried out daily by using water and cleaning agents.
- Especially, the surfaces [door handles, faucets, handrails, frequently touched buttons (elevators, lighting systems), phone handsets, TV remotes] that are frequently in contact with hands as well as the toilets and sinks in common areas should be cleaned at least twice a day, For this purpose, after cleaning with water and chemical agent, bleach (Sodium hypochlorite Cas: 7681-52-9) diluted with water with the ratio of 1/100 (a half cup for 5 liter of water) can be used for disinfection. Phone handsets and other sensitive surfaces that are not suitable for cleaning with chlorine compounds should be disinfected by wiping with 70% alcohol.

- For surface cleaning and disinfection; surface disinfecting agents containing active ingredients that have been proven to be effective against viruses and that have a 'Biocidal Product License' issued by the Ministry of Health can be used,
- The rooms in the special education and rehabilitation centers should be frequently and regularly ventilated by opening the windows. Ventilation of buildings with central ventilation systems should be arranged in such a way that 100% natural air circulation is ensured.
- Also, maintenance of the ventilation systems should be performed and filters should be changed according to the manufacturer's recommendations.
- Gloves should be used during room cleaning. Gloves should be taken off and thrown to garbage bin after cleaning of each room. Hands should
- be washed or hand sanitizer should be used after the gloves are taken off. Cleaning cloths should be allocated based on the area of use and properly cleaned after each use. It is recommended to wash the cleaning materials, which are washable and reusable, at at least 60 oC.
- Trash bins with step-on foot pedal and lid should be placed in each room. When disposing personal wastes such as gloves, masks, diapers, these wastes should be placed in two plastic bags on in other and thrown to domestic garbage bin.
- Stuff such as glasses and plates, which are being used commonly, should be used using water and chemical agents and kept in a clean place until next use. If possible, food and drinks should be served in disposable containers and cups.
- Washable beddings (linens pillows blankets) should be used in the application rooms and the dirty fabric products should be shaken up when being removed. These products should be washed using normal detergents with at least 60 oC.
- Cleaning agents should be used according to manufacturer's instructions. Sufficient ventilation should be ensured after using.
- All cleaning agents should be kept in safe places, where disabled students cannot reach.
- Garbage should be safely thrown every day.
- The toys, which the students can put into their mouth, should be separately kept before cleaning. These toys should be cleaned using water and soap, rinsed, wiped using 70% alcohol, rinsed once again and air dried Dishwasher/washing machine can also be used for cleaning.
- Stuffed toys shouldn't be used during the pandemic, and if they need to be used, they should be private, and they should be cleaned by using water and soap. Fabric toys should be washed using normal detergents with at least 60 oC.
- Books do not pose risk in terms of COVID-19 transmission. But they should be kept out of reach of students to prevent them from getting dirty.

INFORMATION FORM AND COMMITMENT

I have been informed that I should not bring/send the student, for whom I am the parent/guardian, to the institution in the case where s/he has fever, cough, runny nose, respiratory distress, diarrhea, and in the case where there is a person who has respiratory system complaints or who was hospitalized with a history of respiratory system infection, a person diagnosed with COVID-19 in the family,

I accept and undertake that I will not bring/send the student, for whom I am the parent/guardian, to the institution under the above-mentioned conditions, and that I will comply with the necessary precautions and warnings when I have to be at the institution. ..../..../ 20....

Person who makes the commitment:
Name and surname of the Parent/Guardian: Signature:
Name and surname of the Child:

Institution Officer:
Name Surname:
Duty:
Signature:

Appendix-I
Consultation Form

ODUNPAZARI MUNICIPALITY ODUNPAZARI BELEDİYESİ	**ODUNPAZARI MUNICIPALITY** *Odunpazarı Rehabilitation Centre for Autistic and Disabled People Project* **PROJECT NO: 21/016**
	CONSULTATION FORM

Form Completed by:	Date and Time:
Subject of Meeting:	ODUNPAZARI MUNICIPALITY Project No: 21/016

1. MEETING DETAILS

Interviewed Entity:	Mode of Communication ☐
Name-Last Name of the Interviewee:	Telephone / Toll Free Number
Telephone:	Face-to-Face Meeting ☐
Address:	Website / E-mail ☐
E-mail:	Other (Describe) ☐

Type of Stakeholder

Governmental Body ☐	PEB ☐	Private Enterprise ☐	Professional Chamber ☐	NGO ☐
Focus Groups ☐	Union of Industries ☐	Labor Union ☐	Media ☐	University ☐

2. MEETING DETAILS

Project-related questions:	
Project-related concerns/feedback:	
Responses to the views provided above:	

Appendix-J
Grievance Form

ODUNPAZARI MUNICIPALITY	**ODUNPAZARI MUNICIPALITY** *Odunpazarı Rehabilitation Centre for Autistic and Disabled People Project* **PROJECT NO: 21/016**
	GRIEVANCE FORM

Form Completed by:	Date and Time:
Subject of Meeting:	ODUNPAZARI MUNICIPALITY

1. PARTICULARS OF THE COMPLAINANT

Name-Last Name:	**Grievance Communicated by:**
TR ID No:	Telephone / Toll Free Number ☐
Telephone:	Face-to-Face Meeting ☐
Address:	Website / E-mail ☐
E-mail:	Other (Describe) ☐

Type of Stakeholder

Governmental Body ☐	PEB ☐	Private Enterprise ☐	Professional Chamber ☐	NGO ☐
Focus Groups ☐	Union of Industries ☐	Labor Union ☐	Media ☐	University ☐

2. DETAILED INFORMATION ON THE GRIEVANCE

Description of the grievance:	
Solution method requested by the complainant	

Recorded by

Name-Last Name/Signature

Complainant

Name-Last Name/Signature

Appendix-K
Grievance Closure Form

ODUNPAZARI MUNICIPALITY	**ODUNPAZARI MUNICIPALITY** *Odunpazarı Municipality Rehabilitation Centre for Autistic and Disabled People Project* **PROJECT NO: 21/016**
	GRIEVANCE CLOSURE FORM

ODUNPAZARI MUNICIPALITY

PROJECT NO: 21/016

1. DETERMINATION OF THE CORRECTIVE ACTION	
1	
2	
3	
4	
5	
Responsible Departments	
2. GRIEVANCE CLOSURE	
This section will be completed and signed by the complainant, if the grievance provided in the Grievance Log Form is remediated.	

Grievance Closer's Full Name/Signature:

Grievance Closure Date:

Complainant's Full Name/Signature:

...../……/……..