**Disclaimer**

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## Project Description

The proposed investment is an IFC A loan of up to EUR$45mn equivalent in Turkish Lira (TRY) and a senior loan as implementing entity of Clean Technology Fund (CTF) of up to EUR 5 million with a 15-year tenor to Mersin Water & Sewage Administration ("MESKI" or the "Company"), backstopped by a guarantee from Metropolitan Municipality of Mersin (MMM or the City). The proceeds of the Loan will be used to finance (i) the expansion and technology upgrade of four existing wastewater treatment plants (WWTPs), (ii) the construction of two greenfield WWTPs, and (iii) the installation of four deep-sea discharge pipelines (collectively, the Project). MESKI will finance associated facilities (AFs) such as required sewage networks. The project's total cost is estimated at US$80mn, which will be funded 50/50 by IFC and EBRD. MESKI, with these investments, aims to ensure sustained access and quality of services to its rapidly growing customers and support the city's long-term wastewater infrastructure resilience with the environmental benefits of preventing marine pollution.

The ten individual subprojects under the project are: i) expansion of Silifke Wastewater Treatment Plant (WWTP) from 21,000 to 39175 m3/day, ii) expansion of Tarsus WWTP from 61,272 to 111,296 m3/day, (iii) expansion of Karaduvar WWTP from 189,523 to 227,000 m3/day, (iv) construction of new Yenice (in Tarsus) WWTP and ca 850 m long overhead transmission line (OHTL) to connect the WWTP to the national electricity grid, (v) construction of Yesilovacik WWTP (in Silifke), (vi) expansion of Atakent-Atayurt Common WWTP from 5,800 to 21,287 m3/day, (vii) and construction of Atakent-Atayurt deep-sea pipeline (land pipeline- 652 m, sea pipeline 1,464 m), (viii) construction of Cesmeli deep sea pipeline (land – 527,5 m, sea- 1,630 m), (ix) construction of Kizkalesi deep sea pipeline (land- 917 m, sea- 691 m), (x) construction of Bozyazi deep sea pipeline (land- 581 m, sea-2 00 m). Sewage pipelines of 12 km and 160 km located in Yesilovacik and Atakent/Atayurt, which are associated facilities (AFs) as per IFC Performance Standard (PS), will carry wastewater to Yesilovacik and Atakent/Atayurt common WWTPs respectively. While design work was completed, the tender process for the subprojects has not yet been started. MESKI is responsible for the overall operations of the subprojects and AFs.

The two greenfield WWTPs (Yenice and Yesilovacik) will be located on 1 ha and 3.6 ha, which will start construction in the third quarter of 2024. These WWTPs will prevent wastewater collected in cesspits from being transported to them by the company's suction trucks.

## Overview of IFC's Scope of Review

IFC's environmental and social (E&S) review of the Project included (i) site visits to the Karaduvar, Atakent-Atayurt, Silifke WWTPs and discharge routes, Yesilovacik greenfield site and deep sea discharge pipeline route and discharge point including the part of pipeline routes (AFs) in February 2023; (ii) meetings with MESKI's management team at the MESKI Headquarters (HQ) in central Mersin; (iii) review of documentation included subproject specifications, spatial plans and subproject designs, maps, annual environmental reports, and other E&S-related documentation, including E&S Management Systems (ESMS) procedures, annual environmental report, human resources (HR) related documents, past land acquisition and right of way documentation, occupational health and safety (OHS) procedures and statistics, accident reports, emergency preparedness and response plans (EPRPs), and collective labor agreements (CLAs), labor/EHS contractual terms and conditions issued to contractors.

## Identified Applicable Performance Standards

*While all Performance Standards are applicable to this investment, IFC's environmental and social due diligence indicates that the investment will have impacts that must be managed in a manner consistent with the following Performance Standards:*

PS 1: Assessment and Management of Environmental and Social Risks and Impacts
PS 2: Labor and Working Conditions
PS 3: Resource Efficiency and Pollution Prevention
PS 4: Community Health and Safety
PS 5: Land Acquisition and Involuntary Resettlement
PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

*If IFC's investment proceeds, IFC will periodically review the project's ongoing compliance with the Performance Standards.*

## Environmental and Social Categorization and Rationale

This is a Category B project according to IFC's Policy on Environmental and Social Sustainability because the E&S risks and impacts associated with this project are limited, site-specific, largely reversible, and can be readily addressed through mitigation measures.

Most of the construction works for WWTPs, except the two greenfield WWTPs and pipelines, are on existing footprints or rights-of-way. Key E&S aspects relate to MESKI's management arrangements for overseeing construction activities and the E&S management capacity of the respective contractors; construction, hazardous, and non-hazardous waste management; OHS and contractor labor and working conditions; gender and gender-based violence (GBV); community health and safety; biodiversity conservation and management; chance find cultural heritage; and stakeholder engagement.

## Main Environmental & Social Risks-Impacts of the Project and Key Mitigation Measures

*IFC's appraisal considered environmental and social management plans for the project and gaps, if any, between these plans and IFC requirements. Where necessary, corrective measures, intended to close these gaps within a reasonable period, are summarized in the paragraphs that follow and in the agreed Environmental and Social Action Plan (ESAP) disclosed in this review summary. Through implementation of these management plans and the ESAP, the project is expected to be designed and operated in accordance with Performance Standards objectives.*

### PS 1: Assessment and Management of Environmental and Social Risks and Impacts

Environmental and Social Assessment and Management System

The company has established an overarching integrated policy for quality, environment, and OHS and a separate policy for energy efficiency, and a Local Gender Equality Plan, which defines its gender policy.

MESKI has a robust ESMS certified for ISO 9001 (quality), ISO14001 (environmental), ISO45001 (OHS) and ISO50001 (energy management) that is aligned with national requirements and IFC PS1 and includes the following: identification of risks and impacts process; safe working practices; WWTP operational procedures; waste management; legal compliance; fire safety and emergency preparedness; E&S monitoring and review; and stakeholder engagement. MESKI periodically discloses its E&S performance on its website (https://meski.gov.tr/). Besides, MESKI established a zero-waste management system, which will be applied to the subprojects as required by national legislation (Official Gazette no 30829, dated July 12, 2019).

Identification and Management of Risks and Impacts

As per the Turkish Environmental Impact Assessment (EIA) Regulations, (i) expansion of Silifke WWTP; (ii) expansion of Tarsus WWTP; (iii) expansion of Karaduvar WWTP subprojects requires EIA. MESKI retained an environmental consultancy to prepare EIAs for these three projects (https://eced.csb.gov.tr/jsp/ek1/47250, https://eced.csb.gov.tr/jsp/ek1/47013, and https://eced.csb.gov.tr/jsp/ek1/47978, respectively). These EIAs were submitted to and are under the approval stage of the EIA General Directorate of the Ministry of Environment, Urbanization, and Climate Change. Yesilovacik and Yenice WWTPs are out of the scope of EIA regulation's relevant annexes (flowrate < 30.000 m3/day). None of the rest of the subprojects require an Environmental Impact Assessment (EIA); however, as part of the permitting process a "project introduction file" (PIF) was prepared by a third-party E&S consultancy for each subproject, which provides a preliminary E&S impact assessment and mitigation measures for construction and operational phases, including resource consumption, waste management,

noise and vibration assessment, land use, impacts on flora and fauna, and management of effluents, including the relevant mitigation measures. These documents were submitted for review to the Ministry of Environment and Urban Planning and Climate Change (MoE), General Directorate of Environmental Impact Assessment and Monitoring, in 2023-2024, which confirmed that EIAs were not required.

**As indicated in ESAP item #1,** MESKI will develop a Contractor E&S Management Procedure (CESMP) that will require that for each subproject contractor implement subproject-specific Environmental, Social, Health and Safety Management Plans (ESMP) compliant with IFC's PSs, local requirements, and the recommendations from the EIAs and PIF, and MESKI will monitor its implementation. **As outlined in ESAP item #2**, the ESMP will include, but not be limited to, E&S team; safety and environment monitoring, including construction phase noise and vibration measurement; hazard prevention and control; accident prevention, control and reporting; use of personal protective equipment (PPE); life and fire safety; emergency preparedness and response procedures; heat stress; electrical safety; excavation safety; workplace monitoring, management of waste construction waste; waste management plan; first aid; environmental and OHS training programs; chance find procedure; biodiversity management and conservation; community health and safety, including workers' code of conduct and road and traffic safety procedures; and inspection and reporting.

The proposed locations of the subprojects are in areas where cultural heritage is not found officially. Nevertheless, considering the above-ground archaeological sites at the proximities of the sites, construction activities may accidentally lead to the uncovering of cultural heritage. **As per ESAP item # 3**, as part of the ESMS, MESKI will develop a Cultural Heritage Management Procedure that the construction contractors should implement as part of subproject-specific ESMP.

Organizational Capacity and Competency

MESKI's ESMS is managed by the Management Systems and OHS Unit, which consists of 9 full-time experts and 3 full-time doctors to oversee the implementation of ESMS in the existing sites and E&S management of subprojects together with the Investments and Construction Department's project site supervising team. **As per ESAP item #4,** MESKI will assign 3 OHS and environmental experts to the Management Systems and OHS Unit to implement the CESMP**.** The subproject-specific ESMP will require that construction contractors assign the E&S teams required for their implementation.

Emergency Preparedness and Response

MESKI has a documented emergency preparedness and response plan, including firefighting and spill response, in line with IFC's PS and Turkish legal requirements. Firefighting and emergency response teams are within each facility, and firefighting equipment, suitable containment tanks for chemicals and first aid kits are available at each facility and laboratories.

Monitoring and Review

MESKI's strategic KPIs (Key Performance Indicators) include energy consumption, the frequency of site inspections, the number of OHS committee meetings, OHS and environmental training, effective waste management data, and the frequency of preventive maintenance of dangerous equipment and water and wastewater quality. The grievances from subscribers, community members, and other stakeholders are also recorded and monitored.

**PS 2: Labor and Working Conditions**

MESKI employs 2,488 employees in total as of February 2024, of which about 16 percent are females and 81 percent are contracted. The project is expected to create 75 additional jobs in WWTP facilities.

Human Resources Policies and Procedures, Working Conditions and Terms of Employment, Workers' Organization:

MESKI relies on local regulations to manage labor relations and has an HR management system that is in line with IFC PS. All blue and white-collar employees, including the contracted workers, are covered by the collective bargaining agreement, which clearly indicates the terms and conditions of the employment, rights, and benefits, and requirements for following MESKI's ethical standards and code of conduct. MESKI

disclosed its Ethical Standards, Ethics Committee Procedure, and commitment letter to be signed by each employee: https://www.meski.gov.tr/pages/EtikKomisyonu.xhtml.

Non-discrimination and Equal Opportunity:

Women's employment rate is 16 percent in total and 34 percent in senior management. MESKI follows Mersin Metropolitan Municipality's Local Equality Action Plan (https://mersin.bel.tr/uploads/files/yerel%20e%C5%9Fitlik%20plan%C4%B1.pdf).

The collective bargaining agreement in place covers anti-discrimination and anti-violence. The grievance mechanism is established, and harassment-related issues can be handled if needed, and a psychologist is on board to assist with any sensitive complaints. **As per ESAP item #5** MESKI will develop and implement a training program on GBV and Sexual Harassment at the workplace for its employees in charge of operations of project-related WWTPs.

Grievance Mechanism:

MESKI has a formal and well-established workers' grievance mechanism allowing anonymous submissions which can also handle harassment-related complaints, and a psychologist is on board to assist with any sensitive complaints. All direct employees and contractors can report grievances through the hotline, WhatsApp number, social media accounts, grievance boxes located in the WWTP facilities and head office, e-mail, or through union representatives.

Occupational Health and Safety (OHS)

In compliance with Turkish legislation (Law No:6331 of 2012) and consistent with PS2, as part of its ESMS, MESKI has an OHS management system certified ISO45001 which defines the structure of monthly OHS committee meetings, training needs, methodology for risk assessments, permit-to-work system, number of OHS personnel and OHS requirements. Relevant requirements and a set of MESKI's instructions are included in the terms of references (ToR) for contractors. OHS risk assessments include open water, trenches, slippery walkways, working at heights, energized circuits, heavy equipment, and entry into confined spaces (e.g., manholes, sewers, pipelines, storage tanks, and anaerobic digesters). MESKI's OHS branch unit closely monitors lost time, first aid accidents, and near misses including contractors and service providers. Incidents are categorized and reported to OHS management, and each lost time incident is investigated through root-cause analysis and corrective actions identified.

Construction contractors are contractually required to follow Turkish OHS legislative requirements. The contractors have OHS procedures, including risk assessment, and provide employees with OHS and environmental awareness training. Site supervisors of MESKI and the contractors' OHS and environmental specialists are present at construction sites to ensure the implementation of waste management, OHS procedures, equipment safety, and safe use of equipment. Given that climate projections suggest that the city will experience an increase in the number of hot days and heatwaves will become more intense and prolonged in the coming years, the company will prepare procedures based on plant-specific heat stress risk assessment and the working hours/resting times/ providing ample shade/hydration stations will be organized accordingly, including construction contractor employees, **as per ESAP item # 6.**

Workers Engaged by Third Parties:

MESKI has its own contractor company, which contracts 81 percent of its workforce. All third-party workers in MESKI, including those assigned to construction sites, are to respect and follow the labor and OHS standards as those followed by the direct employees, which is ensured by the executive department of each project and OHS department. MESKI checks the legal documents, such as insurance records of all third-party workers, daily on-site during construction projects to ensure no forced and child labor. All contracted workers receive induction, OHS, and relevant technical training.

**PS 3: Resource Efficiency and Pollution Prevention**

Resource Efficiency and GHGs (Green House Gas) Emissions

MESKI makes efforts to improve its energy efficiency through measures such as replacing old equipment, pumps, motors, and technology and implementing predictive maintenance practices, are taken to reduce consumption.

Biogas and energy are produced from Karaduvar and Mezitli WWTPs' sludge through anaerobic digestors. In 2023, electricity and biogas production were 1,185,956 kWh/year and 719,895 m3/year, respectively.

In 2024, 21.42 percent of the total energy consumption is targeted to be provided by renewable energy resources. 40 percent of Karaduvar WWTP's treated effluent is reused by glass manufacturing facilities as cooling/ process water and 50 percent of Mezitli WWTP's treated effluent is used for agricultural irrigation. MESKI has continuously searched for water reuse options.

In rapidly growing Yesilovacik/ Buyukeceli and Yenice districts, where new WWTPs are constructed, wastewater is currently collected in cesspits and temporarily transported via suction trucks to Silifke and Tarsus WWTPs (870 km/ day travel for each of 14 suction trucks). This will be avoided during the project's implementation.

Estimated baseline GHG emissions of the existing WWTPs under the project are 52,634 tons of CO2 per year. Through the project, the company is expected to avoid (-)18,285 tons of CO2 equivalent per year.

Pollution Prevention

*Air Emissions*

Point source air emissions will be limited to a few small emergency generators below the threshold at which IFC and/or Turkish authorities require emission monitoring.

*Solid Waste Management*

MESKI's Construction contractor EHS (Environmental Health and Safety) ToR includes waste management rules for contractors. Management of solid, non-hazardous waste and a limited amount of hazardous waste will align with national legislation and ISO14001 requirements at the construction sites, with adequate waste segregation and reduction. Construction waste is either disposed of at designated disposal areas or, following aggregation, incorporated into structural earthworks.

In MESKI's facilities recyclable wastes, including packaging and office wastes, are recycled by third-party licensed waste companies, and scrap materials are sold. Secondary containment (drip trays and concrete containment) is available at the existing WWTPs subprojects to store oil and chemicals, and relevant Material Safety Data Sheets and spill kits were in place. Environmental engineers manage sludge and sludge cake at the treatment plants. In Karaduvar WWTP, biogas is produced via anaerobic sludge digestors. Dewatered sludge cake (14-20 percent dry matter content) is sent to cement factories for incineration via a licensed waste company in other WWTPs.

*Water and Wastewater*

The project's water consumption will be negligible since water is only used for WWTP's chemical preparation and sanitary purposes. To prevent water losses at the city network, the water supply department expanded 24/7 acoustic monitoring operations to 13 districts.

The treated wastewater discharge parameters (temperature, flowrate, dissolved oxygen, conductivity, pH, COD (Chemical Oxygen Demand), suspended solids) from all WWTPs are monitored continuously by SAIS (Continuous Wastewater Monitoring System), connected to MoE's central online monitoring system for all WWTPs. Water, waste, energy consumption, and biogas production are also regularly monitored.

All existing and planned WWTP's discharge limits (such as BOD5, COD, TSS, pH, Nitrogen and Phosphates) align with "Indicative Values for Treated Sanitary Sewage Discharges" included in IFC General E&S Guidelines.

*Odor, Noise and Dust*

Odor measurements are periodically conducted and align with IFC's General EHS Guidelines and local legislation. Nevertheless, depending on the direction of the wind, there may occasionally be an odor problem in the immediate area of Karaduvar WWTP, where the district's graveyard is located adjacent. As requested

in the public participation meetings, particularly for Karaduvar WWTP expansion, MESKI reported that it will improve its odor prevention measures by (i) fixing one of the out-of-service anaerobic digestors to prevent excess sludge accumulation on site, (ii) physically covering sludge units, (iii) disposing of accumulated sludge via licensed waste management company and (iv) assessing sludge outlet units' locations for replacement options.

MESKI limits the hours of operation of noisy equipment during construction and construction works near the community, and regular watering of construction areas suppresses dust.

**PS 4: Community Health, Safety and Security**

The project's WWTP locations are not near residential areas; however, agricultural and tourism activities are near the project footprint and there is an informal camp used by Syrian refugees along 3 km of the access road to the Tarsus WWTP. The community health and safety management plan to be developed under **ESAP #2** will include workers' code of conduct and traffic safety procedures.

MESKI's technical field team will supervise on-site road and traffic safety during construction. The contractor company will be responsible for following the road and traffic plan developed by the City's Transportation Coordination Directorate (UKOME) specific to the relevant subproject. Road traffic accidents and negative traffic impacts will be minimized through driver training, enforcement of speed limits, and planning to minimize impacts on pedestrian and vehicle crossings. The construction of new WWTPs will prevent wastewater transport to the existing WWTPs via suction trucks mentioned in PS3. This will reduce traffic and public health risks.

MESKI employs 35-armed security personnel in the subprojects. All security personnel are certified after a background screening and regularly trained as per the local regulatory requirements in collaboration with relevant public institutions. **As per ESAP item #7,** MESKI will develop a Security Management Procedure in line with the IFC PS4.

**PS5: Land Acquisition and Involuntary Resettlement**

The total area of the WWTP facilities is 58 ha, including 8.7 ha of new footprint, which does not involve any economic or physical displacement of population. The total length of the deep-sea discharge line on the land in 4 locations is 2.3 km. The land acquisition process for greenfield facilities has been completed, for which only one parcel required expropriation in 2021 that doesn't result in physical displacement or loss of livelihoods and with no open grievances or claims. All other land plots required for the subprojects were owned by public institutions. During the operation, there will be no visual impact or restriction of passing on the land due to the deep-sea discharge line.

MESKI will consult with the respective public authorities to determine the location of the Yenice WWTP ca 850 m OHTL and ensure it passes through public land to avoid any physical or economic displacements. As per **ESAP #8,** MESKI will inform IFC about the final design of the location of the OHTL, and, if the alignment of the Yenice WWTP OHTL results in any physical or economic displacement, MESKI will prepare and implement a Land Acquisition and Resettlement Action Plan in line with IFC PS5.

Project AFs consist of sewer lines to be constructed in 2024-2025 in 2 WWTP locations: Atakent-Atayurt-Arkum and Yesilovacik. The sewer lines are 161 km and 12 km long, respectively. Land acquisition or expropriation will not be required for the sewage networks/pipelines since they will be constructed under existing public roads.

**PS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources**

The subprojects are situated in the Mediterranean region of Turkiye, where the terrestrial components fall within the Eastern Mediterranean conifer-sclerophyllous-broadleaf forests ecoregion of the Mediterranean Forests, woodlands and scrubs biome, and the marine sections are part of the Mediterranean Sea bioregion (as designated by WWF).

The Silifke WWTP, an existing facility, is within a converted section of the Goksu Delta Key Biodiversity Areas (KBA), but no impacts on any of the priority biodiversity values are anticipated because these species do not overlap with the WWTP.

The Yesilovacik WWTP, is a new facility will be constructed within Aydincik and Ovacik Coast KBA, in an area where a woodland habitat had been lost due to forest fires in 2021. Likewise, no impacts on priority biodiversity values are anticipated because the project does not overlap with such values. Even though the woodland at Yesilovacik WWTP location had been destroyed by a fire, the company will still consider it as a Natural Habitat and, **as per ESAP item #9.** MESKI will coordinate with the Regional Forestry Department to identify actions to be implemented to reach the No Net Loss (NNL) objective in line with PS6.

The existing Atakent-Atayurt Common WWTP also falls within the boundaries of the Goksu Delta KBA and will have a marine discharge pipeline that crosses a beach near the WWTP. The beach is not an officially designated sea turtle nesting beach. However, through consultations with biodiversity experts and academics from the Middle East Technical University Institute of Marine Sciences and Mersin University Department and review available data, it was concluded that no sea turtles are nesting on the beach.

The Atakent-Atayurt, Cesmeli, Kizkalesi, and Bozyazi WWTPs include marine discharge pipelines that overlap with priority biodiversity such as marine species and coastal/marine habitats. While these four WWTPs do not overlap with KBAs, they pose potential risks to two sea turtle species, the Mediterranean Monk Seal (IUCN Red List – Vulnerable) and threatened fish. IFC PS6 Natural Habitat No Net Loss (NNL) requirements will apply to these four WWTPs, which will be achieved through good international industry practice (GIIP), the CESMP and subproject-level ESMPs **per ESAP #2.** The ESMPs will ensure that, during the construction phase of all the WWTPs, in line with the Turkish legislative requirements for sea turtle habitats, works are avoided during the breeding/migration period between May 15 and September 30. Additionally, construction-phase vessel and equipment traffic will be managed to avoid any collision with the sea turtles and Mediterranean Monk Seal, enforcing speed limits when encountered and ensuring that animals are not approached or chased under no circumstances. During the operations phase of the project WWTPs, MESKI will define the level of wastewater treatment prior to marine discharge, also considering potential impacts on the marine environment and biodiversity.

**Client's Stakeholder Engagement**

MESKI discloses its grievance mechanism publicly to receive and address any stakeholder concerns. All stakeholder grievances received via the Communication Center (Teksin- https://teksinmersin.com/), which manages the hotline, mobile app, and WhatsApp channels, are recorded and monitored.

MESKI establishes a stakeholder engagement strategy for each planned and ongoing subproject to inform stakeholders. Public participation meetings were organized in September 2023 for Tarsus, October 2023 for Silifke, and November 2023 for Karaduvar for the capacity increase projects with the participation of local stakeholders and community members. The meetings were announced in local newspapers and at the offices of local governments. The main expectation raised in this meeting was related to odor and fly measurements in the facilities. Records of stakeholder engagement are kept, and necessary actions are taken.

As per **ESAP #10,** MESKI will prepare and implement a subproject-specific Stakeholder Engagement Plan (SEP) for each subproject, including AFs in line with IFC's PS1. The SEP to be developed for Tarsus WWTP will identify specific public information and consultation processes for the inhabitants of the informal camp of tents with a focus on traffic and other health and safety aspects.

**Local Access of Project Documentation**

Name of the Place: Mersin Su ve Kanalizasyon İdaresi Genel Müdürlüğü
Address:
Contact Name:
Title:
E-mail:
Telephone:

**E&S Action Plan**

| Item | Action | Completion Indicator | Timetable |
|---|---|---|---|
| **PS1: Assessment and Management of Environmental and Social Risks and Impacts** | | | |
| **1** | MESKI will develop a Contractor E&S Management Procedure (CESMP) that will require that each subproject contractor implement subproject-specific Environmental, Social, Health and Safety Management Plans (ESMP) compliant with IFC's PSs, local requirements, and the recommendations from the EIA (Environmental Impact Assessments) and PIFs, (Project Introduction Files) and MESKI will monitor its implementation. | CESMP accepted by IFC. | December 2024 |
| **2** | As per the CESMP, MESKI will require its contractors to develop ESMPs for each subject including, but not be limited to, E&S team; safety and environment monitoring, including construction phase noise and vibration measurement; hazard prevention and control; accident prevention, control and reporting; use of personal protective equipment (PPE); life and fire safety; emergency preparedness and response procedures; heat stress; electrical safety; excavation safety; workplace monitoring, management of waste construction waste; waste management plan; first aid; environmental and OHS training programs; chance find procedure; biodiversity management and conservation; community health and safety including workers' code of conduct and onsite road and traffic safety; and inspection and reporting<br><br>Biodiversity conservation and management requirements will be achieved through the implementation of good international industry practice (GIIP) and as will also be outlined in CESMP. During the construction phase of the project WWTPs works will be avoided during the breeding/migration period between May 15 and September 30. Construction-phase vessel and equipment traffic will be managed to avoid any collision with the sea turtles and Mediterranean Monk Seal, enforcing speed limits when encountered and ensuring that animals are not approached or chased under no circumstances. | Contractors' ESMP accepted by IFC. | March 2025 |

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| **3** | As part of its ESMS, the company will prepare and implement a chance find procedure aligned with IFC PS8 on Cultural Heritage with clear instructions for all employees, including its construction contractors. | Chance find procedure accepted by IFC. | By two months after commitment or March 2025 |
| **4** | The company will assign 3 OHS and environmental experts to the Management Systems and OHS Unit to efficiently oversee engineering and construction works and implement environmental, social, and OHS measures during construction, including contractors' CESMP, and coordinate all necessary mitigations, monitoring, data collection, and reporting requirements among the respective departments during the construction and operation phases of the project WWTPs. | Documented evidence of the assignments and related CVs accepted by IFC. | By two months after commitment or March 2025 |
| **PS2: Labor and Working Conditions** | | | |
| **5** | MESKI will develop and implement a training program on GBV and Sexual Harassment at the workplace for its employees in charge of operations of project-related WWTPs. | GBV training program accepted by IFC. | By six months after 1st disbursement or January 2025 |
| **6** | The company will prepare procedures based on WWTP-specific heat stress risk assessment with the help of the company's medical doctors and the working hours/resting times/ providing ample shade/hydration stations will be organized accordingly, including construction contractor employees, | Heat Stress Risk assessment and corresponding management procedure accepted by IFC. | By three months after commitment, or March 2025 |
| **PS4: Community Health and Safety** | | | |
| **7** | MESKI will develop a Security Management Procedure in line with PS4 and provide Human Rights and Rule of Conduct training in line with the IFC's Good Practice Handbook on Use of Security Forces to ensure that the safeguarding of personnel and property is carried out in accordance with relevant human rights principles and in a manner that avoids or minimizes risks to the communities. | -Submission of procedure<br>-Submission of training records | By six months after commitment or June 2025 |
| **PS5: Land Acquisition and Involuntary Resettlement** | | | |

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| **8** | MESKI will inform IFC about the final design of the location of the OHTL, and, if the alignment of the Yenice WWTP OHTL results in any physical or economic displacement, MESKI will prepare and implement a Land Acquisition and Resettlement Action Plan in line with IFC PS5. | - Submission of final design of OHTL<br>- Submission of land acquisition and resettlement action plan for the approval of IFC | December 2024 |
| **PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources** | | | |
| **9** | MESKI will coordinate with the Regional Forestry Department to identify actions to be implemented to reach the Natural Habitat No Net Loss objective for the woodland habitat within Goksu Delta Key Biodiversity Area in line with PS6. | Documented evidence of NNL accepted by IFC. | By 1 year after commitment or October 2025 |
| **Stakeholder Engagement Plan** | | | |
| **10** | MESKI will prepare and implement a project-specific Stakeholder Engagement Plan (SEP) for each subproject, including AFs, in accordance with IFC's PS1. The SEP to be developed for Tarsus WWTP will identify specific public information and consultation processes for the inhabitants of the informal camp of tents with a focus on traffic and other health and safety aspects. | Subproject specific SEPs accepted by IFC | March 2025 |