
CEYHAN PROPANE DEHYDROGENATION - POLYPROPYLENE PRODUCTION PROJECT

ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP) (ANNEX-C)

FEBRUARY 2023

ANKARA

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Table 1. Construction Phase Environmental and Social Management Plan (ESMP)

Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
GENERAL							
C.1	Environmental and Social Management system	IFC PS1, EBRD PR1	<p>Project Company will develop an EHSS Policy and HR Policy, which will provide framework for all activities related to the Project and associated Terminal Facility (during construction and operation).</p> <p>Project Company shall set up an ESMT, who will be responsible for implementing the Project Company's corporate ESMS in relation to the Project.</p> <p>Construction phase Environmental and Social Management System (ESMS) will be developed in line with international good practice and guidelines (i.e., ISO 14001: 2004 – Environmental Management System, ISO 45001: 2018– Occupational Health and Safety Management System). The list of management plans at the construction stage is determined by the ESIA document (Chapter 17) and is also copied to/provided at the appendix of this document.</p> <p>The key Environmental and Social commitments of the ESMS will be set out in the contract of EPC Contractor for construction, to be adopted and implemented as part of the EPC Contractor's ESMS.</p> <p>The Project Company will also facilitate ESMP Implementation Committee, which will operate to ensure effective cooperation between the Project Company and SPV of Terminal Facility to meet environmental and social requirements of the Project</p>	<p>Project Company</p> <p>EPC Contractor</p> <p>Subcontractors</p>	Prior to financial close	<ul style="list-style-type: none"> • EHSS Policy • HR Policy • Plans and procedures - see Appendix 	<ul style="list-style-type: none"> • EHSS Policy And HR Policy are in place; • Relevant personnel are hired for the implementation of the ESMS; • Site specific environmental and social plans/procedures are prepared; • Evidence that relevant policies/plans are adopted by the EPC Contractor; • Monitoring records during construction; • Training records prior to/during construction; • Audit and inspection reports.
C.2	Permitting	National legislation	All necessary permits/consents/approvals (including construction permit) will be obtained in accordance with the national legislation (e.g., environmental permits and licenses).	<p>Project Company</p> <p>EPC Contractor</p>	Prior to the date when construction permit is obtained and as	<ul style="list-style-type: none"> • Permit Register 	<ul style="list-style-type: none"> • Permit register is prepared; • Permits are in place.

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					relevant during construction		
C.3	Construction methods	IFC PS1, EBRD PR1	Method statements will be developed for major construction activities (such as earthworks, insulation of heavy equipment/material, etc.) in line with good practice to manage and monitor environmental and social issues during construction phase.	Project Company EPC Contractor Subcontractors	Prior to each major construction activity throughout the construction	<ul style="list-style-type: none"> Method statements 	<ul style="list-style-type: none"> Method statements are prepared.
C.4	Climate Change Risk Assessment (CCRA)	IFC PS1, Best Practice	Implementation of measures described in the CCRA Report.	Project Company O&M Company EPC Contractor Subcontractors SPV of Terminal Facility	Throughout the construction	<ul style="list-style-type: none"> CCRA Report 	<ul style="list-style-type: none"> Evidence of implementation of measures described in the CCRA Report.

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GEOLOGY, SOIL AND CONTAMINATED LAND							
C.5	Seismic risk	IFC General EHS Guidelines, National legislation	The Project will be designed, constructed and operated in accordance with the Turkish regulations and standards for protection against seismic activity. Building, Earthquake Regulation (Official Gazette date/no: 18.03.2018/30364) will be complied with during all construction works within the Project site. Additionally, provisions of Technical Earthquake Regulation on Construction of Coastal and Marine Structures, Railways, Airports (Official Gazette date/no: 18.08.2007/26617) will be followed during the construction of the Associated Facility (Jetty site of the Terminal Facility).	Project Company EPC Contractor	Prior to start of construction works during design phase. Construction works will be inspected in accordance to the relevant regulation through construction.	<ul style="list-style-type: none"> • Design and construction reports and drawings • Seismic Risk Report • Method statements • Construction Environmental and Social Management Plan; • Disaster Management Plan including crisis management and unplanned events • Blasting Management Plan; • Excavation Works Procedure. 	<ul style="list-style-type: none"> • Final design will be checked in accordance with the legislative requirements and project design criteria's; • Audit and inspection reports.

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C.6	Stability and ground conditions	IFC General EHS Guidelines, Best Practice, National Legislation.	<p>Construction works shall be conducted in line with the IFC's General EHS Guideline 4.0 Construction and Decommissioning regarding the measures on structural (slope) stability issues as well as the environmental and health and safety measures.</p> <p>Engineering measures shall be taken against the potential stability problems. These shall include:</p> <ul style="list-style-type: none"> • Use of adequate cut and fill slope designs with consideration of shrink-swell factors for excavated materials; • Design of the cut and fill surfaces to ensure appropriate surface/subsurface drainage; • Use of measures against erosion and sliding risks such as the use of riprap or special slope treatment, use rockfall catch ditch, wire mesh slope protection, shotcrete, rock bolts for rock slopes, etc.; • Support of the slopes of deep excavations by the use of supporting structures such as retaining walls and/ or terraces. 	<p>Project Company</p> <p>EPC Contractor</p> <p>Subcontractors</p>	Prior to start of excavation works through construction.	<ul style="list-style-type: none"> • Geological and geotechnical report. • Construction Environmental and Social Management Plan; • Soil Management Plan; • Blasting Management Plan; • Excavation Works Procedure. 	<ul style="list-style-type: none"> • Construction and excavation plans are prepared in accordance to the geotechnical and geological report; • Daily visual inspection of the slopes, construction site, and excavation areas is performed for ground stability as well as implementation of the mitigation measures; • Audit and inspection reports.
C.7	Protection of topsoil and groundwater	IFC PS3, EBRD PR3, Best practice, National legislation	<p>Before the start of the excavation and construction activities soil stripping will be undertaken at the footprint of the construction areas to remove the surface soil or topsoil (vegetation, fertile soil layer) and subsoil;</p> <p>During soil stripping necessary precautions will be taken to keep them separately intact;</p> <p>Stockpiles will be protected from erosion and contamination impacts. Top and subsoil will be deposited separately, and long-term possible erosion and sedimentation will be prevented through the rehabilitation/planting. Re-planting activities will also contribute to the rehabilitation of the natural balance around the Terrestrial Section and soil rehabilitation at a significant level:</p> <ul style="list-style-type: none"> • Topsoil and land stripped and excavated from the Project site will be temporarily stored in the temporary Topsoil and Excavated Land 	<p>Project Company</p> <p>EPC Contractor</p> <p>Subcontractors</p>	Prior to start of excavation works through construction.	<ul style="list-style-type: none"> • Construction Environmental and Social Management Plan; • Soil Management Plan. 	<ul style="list-style-type: none"> • Soil Management Plan is in place; • Subcontractor management plan is in place; • Construction site, temporary top soil and excavated material storage areas are periodically (e.g., daily and /or weekly) checked for potential contamination, erosion and sediment transport;

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			<p>Deposition areas, where unnecessary Project traffic and handling, or deposition of any contaminants such as oils, chemicals, wastes will be prevented;</p> <ul style="list-style-type: none"> Mitigation measures will be taken (e.g., use of silt fences) to protect newly exposed soil surfaces from rain and wind erosion; <p>All contractors will be required to adopt good construction practices at the site for the protection of soil and follow the General IFC EHS Guidelines. Such as:</p> <ul style="list-style-type: none"> Adequate drainage systems will be provided to minimize and control infiltration; In case requirement, effective short term measures for slope stabilization, sediment control and subsidence control will be provided until long term measures for the operational phase can be implemented. 				<ul style="list-style-type: none"> Incident records; Audit and inspection reports.

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C.8	Protection of soil and groundwater from contamination	IFC PS3, EBRD PR3, Best practice, National legislation	<p>Contaminated soils (if generated any) will be disposed of in an appropriately licensed disposal site;</p> <p>The use of cement and wet concrete in or close to any exposed areas will be carefully controlled;</p> <p>Spoil and other surplus excavation material from the earthworks which is classed as "acceptable fill" shall, wherever practicable, be recovered and used in the construction works. Relevant authorities shall be consulted regarding this on a site-by-site basis to ensure the re-use of the material is acceptable;</p> <ul style="list-style-type: none"> • Surplus construction material will be made available to third parties for reuse on local development projects if it cannot be utilized on site; • During construction activities, hazardous and non-hazardous materials and wastes will be handled according to the ESMS to be prepared by Project Company and where needed, further site-specific management plans will be developed (e.g., Hazardous Material Management Plan); • Proper drainage systems shall be created which will remove the underground, surface and wastewater from the site. 	<p>Project Company</p> <p>EPC Contractor</p> <p>Subcontractors</p>	Throughout construction	<ul style="list-style-type: none"> • Construction Environmental and Social Management Plan; • Construction Emergency Preparedness and Response Plan; • Soil Management Plan; • Hazardous Material Management Plan; • Hazard and Risk Management Procedure; • Construction Machine and Equipment Procedure. 	<ul style="list-style-type: none"> • Emergency Preparedness and Response Plan is prepared; • Emergency spill kits are in place, in good condition and ready for use; • Periodic (e.g., daily and/or weekly) site inspections are performed to check any contamination, leak or spill; • Periodic (e.g., daily and/or weekly) site inspections are performed to ensure all tanks, equipment and vehicles are in intact condition and do not create any leaks; • Hazardous material storage registers are prepared; • Hazardous and non-hazardous waste disposal registers are prepared as well as records are kept properly; • Incident records;

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							<ul style="list-style-type: none"> Audit and inspection reports.
C.9	Spills/accidents and contaminated land	IFC PS3, EBRD PR3, Best Practice, National legislation	<p>In line with the IFC's General EHC Guideline 3.0 Community Health and Safety and EHS Guideline 1.8 Contaminated Land the storage of chemicals, hazardous materials, and other potential contaminants will be kept to a minimum as feasible through inventory management in order to reduce or eliminate the potential onsite and off-site consequences of releases due to accidental and emergency incidents;</p> <p>IFC's General EHS Guideline 1.5 Hazardous Material Management will be followed. Accordingly, the following measures will be taken:</p> <p>Drummed hazardous materials with a total volume equal or greater than 1,000 L will be stored in areas with impervious floor that are sloped or bermed to contain a minimum of 25% of the total storage volume. Drip trays will be used for fuelling mobile equipment;</p> <p>Appropriate secondary containment structures consisting of berms, dikes, or walls to contain at least 110 percent of the largest tank or 25% percent of the combined tank volumes will be provided at tank farms with above-ground tanks with a total storage volume equal or greater than 1,000 L. Secondary containment will be made of impervious, chemically resistant material;</p> <p>Any spillages from handling fuel and liquids will be immediately contained on site and the contaminated soil will be removed from the site for suitable treatment and disposal;</p> <p>Periodical reconciliation of tank contents shall be conducted, and visible portions of tanks and piping shall be inspected for leaks;</p> <p>For underground storage tanks and underground piping double-walled, composite,</p>	<p>Project Company</p> <p>EPC Contractor</p> <p>Subcontractors</p>	Throughout construction	<ul style="list-style-type: none"> Construction Environmental and Social Management Plan; Emergency Preparedness and Response Plan; Soil Management Plan; Hazardous Material Management Plan; Accident and Incident Management Procedure; Hazard and Risk Management Procedure; Construction Machine and Equipment Procedure. 	<ul style="list-style-type: none"> Emergency Preparedness and Response Plan is prepared; Emergency spill kits are in place, in good condition and ready for use; Periodic (e.g., daily and/or weekly) site inspections are performed to check any contamination, leak or spill; Periodic (e.g., daily and/or weekly) site inspections are performed to ensure all tanks, equipment and vehicles are in intact condition and do not create any leaks; Hazardous material storage registers are prepared; Designated hazardous material and waste storage areas are constructed

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			<p>or specially coated storage and piping systems shall be used. For double-walled systems a leak detection system should be installed between the two walls;</p> <p>Secondary containment, drip trays or other overflow and drip containment measures shall be provided, for hazardous material containers at connection points or other possible overflow points;</p> <p>Operation of a closed drainage system and implementation of Emergency Preparedness and Response Plan in the event of spills, fire etc. will prevent significant impacts on soil.</p>				<p>according to the defined mitigation measures as well as standards;</p> <ul style="list-style-type: none"> • Training records; • Incident records; • Audit and inspection reports.

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HYDROLOGY AND HYDROGEOLOGY							
C.10	Protection of surface water	IFC PS3, EBRD PR3, Best Practice, National legislation	<p>Good construction site practices (i.e., measures as described below such as using designated areas for storing materials, regular inspections at construction sites, training of construction workers, placement of sediment traps and/or oil/water, etc.) will be adopted to minimize risks of water pollution.</p> <p>Stockpiles of soil will be stored as needed at designated areas and the quality of the excavation materials and fill materials (i.e., brought from outer sources) shall be checked. Measures will be taken at the soil and overburden stockpiles to prevent sediment transport and fugitive dust emissions. Slopes formed during construction (excavation, fill and stockpile slopes) and filler sections will be provided with proper drainage so as to prevent sediment transport and collect stormwater. Furthermore, measures such as use of silt fences, steel grid wire mesh systems, rehabilitation and replanting of slopes by hydro seeding and barren surfaces, etc. will be applied in order to minimise wind and water erosion and sediment transport impacts;</p> <p>Suitably sized impervious bunds or other containment will be installed where hazardous materials are handled (such as fuel storage and loading areas, hazardous material storage area) to prevent hazardous materials to contaminate the site drainage;</p> <p>Mitigation measures will be taken (e.g., use of silt fences) to protect newly exposed soil surfaces from rain and wind erosion;</p> <p>Surface runoff and site drainage will be managed in order to prevent direct discharge to surface waters. On site built temporary drainage lines will divert the uncontaminated surface runoff to natural drainage. Uncontaminated surface runoff from the site will be passed through a sediment trap for the sediment</p>	<p>Project Company</p> <p>EPC Contractor</p> <p>Subcontractors</p>	Throughout construction	<ul style="list-style-type: none"> • Construction Environmental and Social Management Plan; • Emergency Preparedness and Response Plan; • Construction Surface Water and Wastewater Management Plan; • Accident and Incident Management Procedure; • Hazardous Material Management Plan; • Hazard and Risk Management Procedure; • Construction Machine and Equipment Procedure. 	<ul style="list-style-type: none"> • Emergency Preparedness and Response Plan is prepared; • Construction Surface Water and Wastewater Management Plan is prepared. • Register for wastewater discharges; • Wastewater discharge transfer records and permit is in place; • Emergency spill kits are in place, in good condition and ready for use; • Periodic (e.g., daily and/or weekly) site inspections are performed to check any contamination, leak or spill; • Periodic (e.g., daily and/or weekly) site inspections are performed to ensure all tanks, equipment and vehicles are in

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			<p>particles to settle out of the water before diversion into the natural surface runoff;</p> <p>Contaminated surface runoff will be sent to treatment before discharge to environment;</p> <p>In-situ impermeable (i.e., polyethylene) septic tanks will be used to collect domestic wastewater from the camping sites and necessary agreements will be made with the municipality for the collection and disposal of wastewater via vacuum trucks to prevent direct wastewater discharges to the environment;</p> <p>There will not be any surface water abstraction for the Project water demand. Water demand for construction activities and dust suppression will be supplied from the existing municipality line.</p>				<p>intact condition and do not create any leaks;</p> <ul style="list-style-type: none"> • Hazardous material storage registers are prepared; • Designated hazardous material and waste storage areas are constructed according to the defined mitigation measures as well as standards; • Incident records; • Audit and inspection reports.

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C.11	Protection of groundwater		<p>Construction activities will be regularly inspected on site;</p> <p>Construction workers and relevant staff will be trained related to the implementation of good construction site practices and on spill response and prevention measures;</p> <p>No fuelling of vehicles or equipment will take place within excavated areas. Fuelling shall only be carried out in designated areas away from surface drainage ways discharging outside the site;</p> <p>No hazardous materials will be stored in excavated areas and all handling of hazardous materials will take place under special supervision;</p> <p>Even though groundwater extraction and use are not planned for the Project, in case of such a need, all the necessary permits in the scope of relative legislation will be acquired prior to use;</p> <p>Storage areas will be designed and constructed to provide secondary protection for hazardous materials and wastes stored on site;</p> <p>In order to prevent groundwater contamination in case of a spill, spill kits will be present in the areas where the liquid materials are stored, the drainage systems of the areas where these materials are stored will be designed so as to prevent the spills and leaks from reaching the storm water system.</p>	<p>Project Company</p> <p>EPC Contractor</p> <p>Subcontractors</p>	Throughout construction	<ul style="list-style-type: none"> • Emergency Preparedness and Response Plan; • Construction Environmental and Social Management Plan • Construction Surface Water and Wastewater Management Plan; • Accident and Incident Management Procedure; • Hazardous Material Management Plan; • Hazard and Risk Management Procedure; • Construction Machine and Equipment Procedure. 	<ul style="list-style-type: none"> • Emergency Preparedness and Response Plan is prepared; • Construction Surface Water and Wastewater Management Plan is prepared. • Register for wastewater discharges; • Wastewater discharge transfer records and permit is in place; • Emergency spill kits are in place, in good condition and ready for use; • Periodic (e.g., daily and/or weekly) site inspections are performed to check any contamination, leak or spill; • Periodic (e.g., daily and/or weekly) site inspections are performed to ensure all tanks, equipment and vehicles are in intact condition

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							and do not create any leaks; • Hazardous material storage registers are prepared; • Designated hazardous material and waste storage areas are constructed according to the defined mitigation measures as well as standards; • Incident records; • Audit and inspection reports.

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C.12	Protection of Seawater quality		<p>In the scope of the Project, dumping of any liquid and solid material to the sea will not be allowed during the construction. Measures will be taken in order to prevent any construction waste falling into sea and any spills or leaking of oil and petroleum products;</p> <p>Based on the natural drainage pattern and groundwater flow direction at the Project site the potential contaminant transfer routes are towards the İskenderun Bay. Hence, any spills, leaks and contamination of soil, groundwater and surface water will be strictly prevented on site to prevent downstream contamination of seawater;</p> <p>It is expected that good environmental management practices are followed during the Associated Facility (Terminal Facility including the Jetty site) construction by the relevant owner company. Hence, as a best management practice it will be checked that no direct discharges or dumping are allowed and good environmental management means are followed by the relevant owner company.</p>	<p>Project Company</p> <p>EPC Contractor</p> <p>Subcontractors</p>	Throughout construction	<ul style="list-style-type: none"> • Construction Environmental and Social Management Plan; • Emergency Preparedness and Response Plan; • Construction Surface Water and Wastewater Management Plan; • Accident and Incident Management Procedure; • Hazardous Material Management Plan; • Hazard and Risk Management Procedure; • Construction Machine and Equipment Procedure. 	<ul style="list-style-type: none"> • Emergency Preparedness and Response Plan is prepared; • Construction Surface Water and Wastewater Management Plan is prepared. • Register for wastewater discharges; • Wastewater discharge transfer records and permit is in place; • Emergency spill kits are in place, in good condition and ready for use; • Periodic (e.g., daily and/or weekly) site inspections are performed to check any contamination, leak or spill; • Periodic (e.g., daily and/or weekly) site inspections are performed to ensure all tanks, equipment and vehicles are in intact condition

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							and do not create any leaks; • Hazardous material storage registers are prepared; • Designated hazardous material and waste storage areas are constructed according to the defined mitigation measures as well as standards; • Incident records; • Marine water quality analysis in case any spill to the sea. • Treated wastewater quality analysis records are in place in case the use of wastewater treatment plant for construction camp. • Audit and inspection reports.

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C.13	Spill Response	IFC PS3, EBRD PR3, Best Practice, National legislation	<p>All staff and subcontractors will be required to report any incident. Incident reports will be subject to investigation, and remedial and preventive actions will be taken as needed;</p> <p>Regular periodic integrity testing for hazardous material storage equipment (i.e., storage tanks and piping systems) will need to be conducted and appropriate leak detection systems will be in place for underground storage tanks and buried pipes;</p> <p>Spill response will take place as quickly as possible. Contaminated materials will be collected and sent to appropriate disposal facilities;</p> <p>A Hazardous Material Management Program including spill prevention and control plans shall be prepared and implemented;</p> <p>An Emergency Preparedness and Response Plan should be developed to ensure mitigation of spills from hazardous materials;</p> <p>In order to prevent groundwater contamination in case of a spill, spill kits will be ready to use in the areas where the liquid materials are stored, the drainage systems of the areas where these materials are stored will be designed so as to prevent the spills and leaks from reaching the storm water system;</p> <p>It will be ensured that the personnel, responsible for the management of hazardous materials and wastes, have the necessary and appropriate training;</p> <p>An Emergency Preparedness and Response Plan (EPRP) that shall be prepared before the initiation of the construction phase, shall include marine. The Project specific plan shall be in line with the "Act on Guidelines for Response to Emergencies and Compensation of Losses In Case of Pollution of the Marine Environment From Oil and Other Harmful Substances" and its regulations.</p>	<p>Project Company</p> <p>EPC Contractor</p> <p>Subcontractors</p>	Throughout construction	<ul style="list-style-type: none"> • Construction Environmental and Social Management Plan; • Emergency Preparedness and Response Plan; • Construction Surface Water and Wastewater Management Plan; • Accident and Incident Management Procedure; • Hazardous Material Management Plan; • Hazard and Risk Management Procedure; • Construction Machine and Equipment Procedure. 	<ul style="list-style-type: none"> • Emergency Preparedness and Response Plan is prepared; • Construction Surface Water and Wastewater Management Plan is prepared; • Emergency spill kits are in place, in good condition and ready for use; • Periodic (e.g., daily and/or weekly) site inspections are performed to check any contamination, leak or spill; • Periodic (e.g., daily and/or weekly) site inspections are performed to ensure all tanks, equipment and vehicles are in intact condition and do not create any leaks; • Hazardous material storage registers are prepared; • Designated hazardous material and waste storage

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							areas are constructed according to the defined mitigation measures as well as standards; <ul style="list-style-type: none"> • Incident records; • Audit and inspection reports.
MATERIAL RESOURCES AND WASTE MANAGEMENT							
C.14	Supply of Materials	Best Practice	The following mitigation measures will be implemented related to the supply of materials: <ul style="list-style-type: none"> • Materials will be sourced from locations as close as possible to the Project site so as to minimise the impact of transportation route and distance. Where feasible, local suppliers will be prioritised for the procurement of materials and services to increase local benefits; • Recycled materials and materials certified as being from "green" or lower carbon sources will be used where practicable; <ul style="list-style-type: none"> ○ Materials from quarries, borrow pits, crushing plants and asphalt plants will be sourced from suppliers operating with valid environmental and other permits and licenses and where the sites are managed in full compliance with all applicable environmental, health and safety and social standards and specifications; ○ Appropriate storage conditions of these materials/chemicals will be established in line with the relevant chemical and health and safety regulations and international guidelines. 	Project Company EPC Contractor Subcontractors	Throughout construction	<ul style="list-style-type: none"> • Construction Environmental and Social Management Plan; • Subcontractor Management Plan; • Supply Chain Management Plan; • Purchasing and Supplier Evaluation Procedure. 	<ul style="list-style-type: none"> • Subcontractor Management Plan is prepared; • Supply Chain Management Plan is prepared; • Subcontractor evaluation records in accordance to the Supply Chain Management Plan are in place; • Subcontractor periodic (two times a year) inspection records in accordance to the Supply Chain Management Plan are in place; • Audit and inspection reports.

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C.15	Management of Excavated Material	IFC PS3, EBRD PR3, National legislation	<ul style="list-style-type: none"> • IFC's EHS General guidelines 4.0 Construction and Decommissioning, and 1.6 Waste Management will be followed for the relevant activities; • It is anticipated that approximately 5,447,805 m³ excavation material will be produced. The topsoil stripped from the construction areas and the excavated material will be stored separately in the temporary Excavated Material Storage Areas; • The topsoil will be preserved through mitigation measures during the storage and finally used for the landscaping; • Part of the excavated material will be used as backfilling material (100,000 m³) on the project site; • The remaining excavation material will be used as filling material in the CPIR Project. In the case of excess excavation material, it will be sent to licensed excavation waste disposal sites. The excavation wastes will be managed in line with Regulation on Control of Excavation, Construction and Demolishing Wastes. 	Project Company EPC Contractor Subcontractors	Throughout construction	<ul style="list-style-type: none"> • Construction Environmental and Social Management Plan; • Soil Management Plan; • Waste Management Plan. 	<ul style="list-style-type: none"> • Soil Management Plan is prepared and implemented. • Soil Management Plan includes opportunities alternative use of excavated materials; • Register regarding production, temporary storage, transfer and disposal of excavated material; • Construction site, temporary top soil and excavated material storage areas are periodically (e.g., daily and /or weekly) checked for potential erosion and sediment transport; • Consents/permits are in place for disposal or storage of excavated soil at a disposal or storage area. • Audit and inspection reports.

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C.16	Waste Generation and Management	IFC PS3, EBRD PR3, National legislation	<ul style="list-style-type: none"> All the waste will be collected, segregated, labelled and stored on site according to the requirements by relevant Turkish regulations which address waste minimisation, segregation, labelling, storage, transportation and recycling/disposal; Before the construction activities Project Company will prepare a site-specific Waste Management Plan (WMP) for construction phase in line with the provisions of Turkish Legislation and IFC EHS guidelines; Whenever possible, priority will be given to minimise the amount of waste and raw material use through recovery and re-use of raw materials; Appropriate containment shall be used during temporary storage of wastes. Record keeping will be done for all waste generation, storage onsite and offsite waste transportation activities to third party waste management facilities. Periodic inspections will be conducted in the waste recycling/disposal facilities to ensure proper disposal practices are implemented. 	Project Company EPC Contractor Subcontractors	Throughout construction	<ul style="list-style-type: none"> Construction Environmental and Social Management Plan; Waste Management Plan. 	<ul style="list-style-type: none"> Waste management plan is prepared and implemented; Periodic site inspections (daily and weekly) is performed to ensure that all wastes are separately collected, segregated, labelled and stored in designated areas; Waste register including type, amount, disposal method, transfer record and disposal site is prepared. All wastes are transferred and/or disposed to licenced /permitted disposal sites or companies. Waste disposal sites/companies are periodically (two times a year) audited by the Project Company or EPC Contractor. Declaration records made to

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							<p>the Ministry of Environment, Urbanization and Climate Change (MoEUCC) are annexed to the Waste Register;</p> <ul style="list-style-type: none"> All waste manifests are in order and ready for review during the audits of the Provincial Directorate of Environment, Urbanization, and Climate Change (PDoEUCC); Training records. Audit and inspection reports.
C.17	Wastewater	IFC PS3 EBRD PR3 National legislation	<ul style="list-style-type: none"> The domestic wastewater to be generated during construction phase of the Project will be collected in impermeable underground polyethylene septic tanks and necessary agreements will be made with the municipality to collect wastewater via vacuum trucks regularly; Regular septic tank integrity tests will be conducted to prevent any failure and leakage from the tanks; A stormwater and wastewater drainage and collection system will be established on site to collect and manage uncontaminated and contaminated drainages separately. 	<p>Project Company</p> <p>EPC Contractor</p> <p>Subcontractors</p>	Throughout construction	<ul style="list-style-type: none"> Construction Environmental and Social Management Plan; Construction Surface Water and Wastewater Management Plan. 	<ul style="list-style-type: none"> Construction Surface Water and Wastewater Management Plan is prepared and implemented; Project approvals are in place for septic tanks; Wastewater treatment plant project approval and discharge permit are in place in case the use of wastewater

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
							treatment plant for Construction Camp; • Register for wastewater discharges; • Wastewater discharge transfer records and permit is in place;; • Incident records; • Audit and inspection reports.
AIR QUALITY							
C. 18	Dust emissions during construction	IFC PS3, EBRD PR3, Best Practice, National legislation	An Air Quality Control and Monitoring Plan will be prepared to include mitigation measures that will be taken to reduce the dust emissions during construction: <ul style="list-style-type: none"> Minimal particulate emission from the construction activities will be maintained by good management and housekeeping practices and use of dust suppression methods. Water spraying will be performed at dust generating areas inside the Project site especially during dry weather conditions; Where high dust emission cannot be prevented particularly due to wind effect and at locations close to the residential areas in addition to the water spraying polymer emulsions (approved chemical dust suppressants) will be used for dust suppression, particularly at the temporary Excavated Material Storage Areas, on stockpiles, slopes, on the temporary unpaved, or earth roads within the Project site; 	Project Company EPC Contractor Subcontractors	Throughout construction	<ul style="list-style-type: none"> Construction Environmental and Social Management Plan; Construction Air Quality Control and Monitoring Plan; Blasting Management Plan; Construction Machine and Equipment Procedure; Construction Traffic Management Plan. 	<ul style="list-style-type: none"> Construction Air Quality Control and Monitoring Plan is prepared and implemented; Periodic (hourly, daily, weekly and monthly) Air quality monitoring are performed at nearest receptors defined in ESIA; Handheld mobile devices are used for hourly checks in order to assess effectiveness of the mitigation measures;

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			<ul style="list-style-type: none"> Where necessary, in order to minimise the fugitive dust transport to the residential areas wind breaks or barriers will be installed around the storage piles, particularly in the temporary Excavated Material Storage Areas; Turkish Regulation on the Control of Excavated Soils, Construction and Demolition Wastes (Official Gazette Date/No: 18.03.2004/25406) will be followed which requires taking necessary measures to minimize dust emissions during excavation; Excavated soils will be stockpiled (as necessary) at designated areas and will be placed as far as possible from the settlements in the west. Dusty and loose materials will be properly covered or top layers will be kept moist; Screens will be placed as necessary at the construction site to reduce dust emissions. <p>The following mitigation measures will be implemented to minimize dust emissions related to transport of materials during construction:</p> <ul style="list-style-type: none"> Vehicle speed limits will be applied and outside the Project site for paved and unpaved roads (e.g., unpaved roads around 10km/h, paved roads around 20 km/h within the site). Truck operators will be trained to comply with speed limits and good construction site practices; Transfer roads will be sprayed with water as necessary (for example using mobile bowsers) to prevent significant dust emissions especially in dry weather conditions; Open top trucks carrying excavated soils will be covered before leaving the construction area; The material drop distance will be limited between the offloading point and stockpile to no more than 1 m and the flow of material will 				<ul style="list-style-type: none"> Monitoring results are recorded; Training records. Incident records; Grievance records on air quality; Audit and inspection reports.

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			be restricted using dead boxes, socks, drop down spouts/sleeves; <ul style="list-style-type: none"> Frequently used and long-term haulage roads will be paved (e.g., asphalt, concrete, etc.); Daily visual inspections will be done at the stockpiles, haulage roads and during the heavy vehicle movements in order to detect dust emission sources; Air pollutants will be monitored at nearby sensitive locations to ensure minimal impacts in accordance with the Air Quality Control and Monitoring Plan. It is suggested to undertake monthly measurements of PM10 in the first three months of construction during earthworks; if the results are observed to be below limit values, measurements will continue to be conducted quarterly or if limit values are exceeded, the measurements will continue to be conducted monthly. 				
C.19	Exhaust emissions during construction	IFC PS3, EBRD PR3, Best Practice, National legislation	<ul style="list-style-type: none"> The construction equipment and trucks will be maintained regularly to keep them in good working condition to minimize exhaust emissions caused by poor performance; Low sulphur fuel will be used as far as possible; Engines of the equipment/trucks will be prevented from idling and running unnecessarily; Unnecessary Project traffic will be avoided inside and outside of the Project side by adequate planning of material transport; A Construction Traffic Management Plan will be prepared and implemented which will decrease the impacts of the construction traffic. This, in turn, will lower the exhaust emissions from the truck movements. 	Project Company EPC Contractor Subcontractors	Throughout construction	<ul style="list-style-type: none"> Construction Environmental and Social Management Plan; Construction Air Quality Control and Monitoring Plan; Construction Machine and Equipment Procedure. 	<ul style="list-style-type: none"> Construction Traffic Management Plan is prepared and implemented; Vehicle /machinery / equipment inspection records are in place. Register regarding vehicle /machinery /equipment, fuel type, and monthly use amount is in place. Training records of operators and

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							drivers on fuel use and exhausted emission control; <ul style="list-style-type: none"> Audit and inspection reports.
NOISE AND VIBRATION							
C.20	Noise	IFC PS3, EBRD PR3, Best Practice, National legislation	High noise generating activities such as pile driving will be performed and heavy machinery will be operated during the day-time; Similarly, blasting will be performed during the daytime during construction; A Noise Control and Monitoring Plan (NCMP) will be developed to cover the following mitigation measures during the construction phase in order to ensure that noise limit values set in the standards are met: <ul style="list-style-type: none"> 'Low-noise' equipment will be used during construction phase as far as possible. Where construction equipment is provided with sealed acoustic covers or enclosures, these will be kept closed whenever the machines are in use; Machines will be shut down or throttled down to a minimum when not in operation; Maintenance procedures will be implemented in order to keep equipment in good working condition to minimise extraneous noises caused by poor performance; Necessary consent will be obtained from Adana Provincial Directorate of Environment, 	Project Company EPC Contractor Subcontractors	Throughout construction	<ul style="list-style-type: none"> Construction Environmental and Social Management; Construction Noise Control and Monitoring Plan; Construction Traffic Management Plan 	<ul style="list-style-type: none"> Construction Noise Control and Monitoring Plan is prepared and implemented; Consent regarding construction activities performed during evening and night time is in place; Periodic (hourly, daily, weekly and monthly) noise and vibration monitoring are performed at nearest receptors defined in ESIA; Stationary vibration

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<p>Urbanization and Climate Change for undertaking construction activities during evening and night-time;</p> <ul style="list-style-type: none"> Noisy activities taking place within construction sites will be located away from the residential areas as far as possible; Noise related to construction traffic will be properly managed through implementation of a Construction Traffic Management Plan; On-site structures such as containers, offices, hoardings will be used to screen sensitive receptors from noise sources as far as possible. Where necessary movable noise barriers (2-2.5 m high) will be used to ensure receptor noise levels are less than the limit values adjacent to noisy activities; Nearby communities will be contacted especially prior to pile driving activities to inform them about the timing and duration of piling; Awareness will be increased among construction workers regarding noise mitigation; <p>The project specific CNCMP will include a noise impact monitoring program to measure noise levels at the closest sensitive receptors (except R1 as defined in the ESIA Ch10). It is suggested that noise monitoring measurements are conducted monthly in the first 3 months of construction to identify the need for noise barriers. If levels at receptors are seen to exceed the standards, the noise monitoring measurements will continue monthly, and measures will be taken to reduce noise levels so that the limit values are met during all phases of construction. If the results of noise monitoring in the first 3 months of construction are observed to be below limit values, monitoring will continue to be conducted quarterly. It is important to note that noise monitoring may be undertaken more frequently,</p>				<p>monitoring devices are used at nearest house and at least two location situated at ancient waterway during blasting.</p> <ul style="list-style-type: none"> Monitoring results are recorded; Training record; Incident records; Monitoring records; Grievance records on noise and vibration; Audit and inspection reports.

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<p>if there is significant number of complaints from stakeholders;</p> <p>Vibration modelling for the pile driving activities during construction verified that created vibration levels drop below 1 mm/s at a distance of 65 meters. Thus; no impact is expected from constructional vibration activities as long as necessary mitigations are taken and proper warnings are delivered, since, there will be no receptors closer than 65 meters to the Project site;</p> <p>According to Excavation Design Report prepared for the Project, the following mitigation measures will be taken during blasting in construction phase in order to minimise environmental and social impact as much as possible:</p> <ul style="list-style-type: none"> • In the proposed pre-split blasting design, it is recommended that the pre-split holes be blasted in groups of 5 with a delay of 17 ms between groups to minimise environmental disturbances in terms of air shock and noise; • In the blasting design, “Controlled bench Blasting” is foreseen as a blasting model for the Project in order to ensure the use of energy in breaking works without turning into seismic waves and without causing environmental impact. In determining the height of the bench, the boom length of the loader machines to be used, the bucket capacities and the amount of charge per delay that should be used according to the risk points (blasting zones defined with respect to distance to the sensitive receptors) specified in the Excavation Design Report; • In blasting, it is envisaged that each hole will be detonated separately, thus keeping the charge per delay to a minimum; • An oblique hole application has been considered to ensure that the energy is used in breaking and translation; 				

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			<ul style="list-style-type: none"> • Two-row shots are envisaged in the models. However, it can be applied in 3 or more sequential shot and it will be necessary that each hole be fired at separate delays; • In terms of controlling environmental impacts, vibration and air shock measurements should be made using vibration meters in adequate quality and quantity during the application; • Protocols in respect to shots should be duly kept and archived; • The firing is aimed to be carried out with delayed capsules (without electricity). It will be ensured that the charge per delay is kept to a minimum; • It is important in terms of environmental impact to keep the amount of explosive detonated at a time at the minimum; • After trial shots, it is anticipated that necessary corrections and renewals will be conducted, taking into account rock behaviour and environmental impacts, and the records will be taken with sufficient number of vibration meters; • An appropriate public relations program should be developed and the public in close settlements should be informed by the CLO (Community Liaisons Officer); <p>Vibration levels will be monitored upon a grievance made by the nearby residents and if the standards are exceeded, measures will be taken to reduce vibration;</p> <p>An efficient grievance mechanism will be established to collect complaints from the local residents regarding the noise and vibration in order to prevent any discontent by the local communities.</p>				

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TRAFFIC							
C.21	Project Traffic	IFC PS4 EBRD PR4	<p>A Project specific Construction Traffic Management Plan (CTMP) will be prepared and implemented;</p> <p>Mitigation measures as part of the Traffic Management Plan will be developed in consultation with affected communities, vulnerable people or groups in communities and stakeholders, including Incirli community. The appropriate consultation measures will be provided in the Plan;</p> <p>Necessary consultation with the relevant authorities will be conducted related to the implementation of the Construction Traffic Management Plan;</p> <p>An efficient grievance mechanism will be implemented to collect complaints from local residents and other stakeholder on the potential traffic issues.</p>	<p>Project Company</p> <p>EPC Contractor</p> <p>Subcontractors</p>	Throughout construction	<ul style="list-style-type: none"> Construction Environmental and Social Management Plan Construction Traffic Management Plan / Traffic Management Procedure 	<ul style="list-style-type: none"> Construction TMP is prepared and implemented; Evidence that Construction TMP requirements are cascaded down to EPC Contractor and subcontractors; Evidence of regular monitoring of implementation of the Construction TMP; Evidence of consultations with affected communities and authorities; Evidence of informing affected communities on grievance mechanism.
C.22	Marine traffic for community safety	IFC PS4, EBRD PR4	<p>No marine traffic related to the Project construction activities is expected. However, the design and construction of the Jetty as part of Terminal Facility (associated facility) will be implemented. The following measures should be implemented:</p> <ul style="list-style-type: none"> Marine Traffic Management Plan (TMP) should be developed by the SPV responsible for construction & operation of associated 	<p>Project Company</p> <p>SPV for the Terminal Facility</p> <p>EPC Contractor</p>	Construction phase	<ul style="list-style-type: none"> Marine Traffic Management Plan 	<ul style="list-style-type: none"> Marine TMP is developed; Evidence of interaction with fishermen is in place; Emergency Preparedness and Response

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			<p>facilities. The Company will recommend the SPV development of this plan and will make reasonable effort to ensure this measure is implemented;</p> <ul style="list-style-type: none"> • Up-to-date information on activities at the sea will be conveyed to fishermen in Incirli and Gölovası; • An Emergency Preparedness and Response Plan, which covers the Marine Part of the Project, shall be prepared before the construction stage, in accordance with the "Act on Guidelines for Response to Emergencies and Compensation of Losses in Case of Pollution of the Marine Environment from Oil and Other Harmful Substances" and its provisions; • Mitigation measures regarding health and safety of fishermen should be implemented (see 'Community Health and Safety' below); • A grievance mechanism that allows stakeholders (including fishermen) to communicate concerns and have them addressed in a timely and effective manner shall be established and implemented. 				<p>Plan covering marine part is in place;</p> <ul style="list-style-type: none"> • Evidence of implementing measures regarding health and safety of fishermen is in place; • Evidence that grievance mechanism is established to receive comments/grievances of stakeholders (including fishermen). Evidence of informing fishermen on grievance mechanism.
ECOLOGY							
C.23	Terrestrial: Flora	IFC PS6, EBRD PR6	<ul style="list-style-type: none"> • To minimise impacts on <i>Cyclamen persicum</i>, tubers of the species should be collected prior to construction phase (preferably in March-April) and replanted in areas that would not be impacted by the Project activities. Monitoring studies should be conducted during the flowering season of the species in February-March. • Before the start of construction works, a survey will be conducted in the sand dunes in the immediate vicinity where <i>Pancratium maritimum</i> might be distributed. In areas likely to be affected, tubers of the species will be collected prior to construction (preferably in March-April) and replanted in areas that 	<p>Project Company</p> <p>EPC Contractor</p> <p>Subcontractors</p>	Prior to Construction and through construction.	<ul style="list-style-type: none"> • Construction Environmental and Social Management Plan; • Biodiversity Management Plan • Terrestrial Biodiversity Action Plan 	<ul style="list-style-type: none"> • Biodiversity Management Plan is prepared and implemented. • Terrestrial Biodiversity Action Plan is prepared and implemented. • Evidences regarding implementation of the

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			<p>would not be impacted by the Project. In order to monitor success of the newly established populations, monitoring studies should be conducted during the flowering season of the species in February-March.</p> <ul style="list-style-type: none"> • Limit Project activities to designated sites so that there is no impact on the habitat. • Minimise land requirements for permanent facilities and areas of clearance. • Landscaping works will be conducted after the completion of construction phase, where possible. • Minimise the width of access roads. • Inform and train Project personnel regarding the necessary mitigation measures. • Use native plant species in plantations along the roads to prevent erosion and ensure habitat integrity. Some of the tree species that can be used in landscaping include <i>Pinus brutia</i>, <i>Pinus pinea</i> and <i>Zizyphus lotus</i>, a natural shrub species of the region. • Strictly prohibit unnecessary destruction of habitats, cutting of trees or vegetation found outside the area absolutely needed for the project. • Prevent introduction of alien species on purpose or by accident using measures including the following: <ul style="list-style-type: none"> – Incinerate dried plant material if suitable incineration sites are available. – All vehicles leaving the infested area and / or transporting infested soil/materials must be thoroughly pressure-washed in a designated wash-down area before being used for other work. – Environmental Awareness training will be provided to all personnel to 				<p>Biodiversity Management Plan and Terrestrial Biodiversity Action Plan;</p> <ul style="list-style-type: none"> • Training records of the personnel on the mitigation measures regarding protection of the flora species; • Reinstatement and landscape arrangements after completion of construction activities; • Evidence of collection of the tubers of the <i>Cyclamen persicum</i> (and <i>Pancreatium maritimum</i> if found during survey) prior to construction and ensure proper replantation of this species; • Audit and inspection reports.

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			<p>increase awareness about the invasive species.</p> <ul style="list-style-type: none"> - Populations and population densities of <i>Solanum elaeagnifolium</i> (also newly detected AIS) will be determined by pre-construction surveys and routine inspections. - The vegetable soil will be stripped and stored prior to construction and the stripped vegetation will be used to make the surrounding natural. The vegetable soil will not be used in any other area. Also will not be stored next to existing alien invasive species infestations - Topsoil will not be imported from elsewhere / if importation is necessary this will be from a reputable supplier with certification that the material does not contain AIS. Local species will be used in landscaping/planting studies. Non-native plant species will not be used. - An Invasive Species Management Plan will be developed and implemented for the Project, which will take cognizance of the following points: - Labor-intensive manual control of Invasive Alien Plants will be applied in preference to application of herbicides or other chemicals. - The populations of <i>Solanum elaeagnifolium</i> (also newly detected AIS) will be detected and removed from the project site, and follow-up of their development. - After removing the plants, they will be air dried until dead. If possible, the material will be covered with plastic to speed up decomposition and dispersal 				

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			<p>will be limited by birds and other animals. Placing material in areas where there is a risk of being swept away by rain or into a waterbody will be avoided.</p> <ul style="list-style-type: none"> - During the transportation of material off site, plants will be put in thick, durable plastic bags and will be disposed at licensed landfill. The material will be securely contained to avoid spread during transport. - Invasive species will not be used in replanting/reseeding works to be carried out due to the project. It should be ensured that the species to be used in replanting/reseeding studies are not invasive. - Source areas such as vehicle parking and mobilization area will be kept clean of invasive species to minimize the presence of seeds that can be dispersed unintentionally. - Seeds belonging to species that escape the eyes of the researchers, come to the project site by birds, wind or man-made and are thought to be invasive should be removed from the project site and the impact area. - Live invasive species can be removed from the project site by cutting or uprooting. - Removal of all invasive species from Project site by uprooting at start of operation phase. 				

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C.24	Terrestrial: Fauna	IFC PS6, EBRD PR6	<ul style="list-style-type: none"> All trees and shrubs will be cut and the ground will be cleared before stripping the surface soil in the construction site to protect and reduce negative impacts on amphibians, reptile and mammal species. Leave some natural areas untouched, to provide space for some species to continue their existence in the area. Wildlife warning and information signs will be placed on the construction sites Soil stripping activities conducted prior to construction will be performed before winter season to prevent impacts on latibulized amphibians during construction activities. Provided that soil stripping is conducted before winter season, construction activities may continue throughout the winter The following mitigation measures will apply for the protection of bird species: <ul style="list-style-type: none"> Surface clearing and stripping activities will not be implemented in birds' breeding period between February and early June in order to avoid the damage on bird species. In the parts of the Project site where surface clearing and stripping are already in progress, the construction activities may continue to be undertaken. In some parts of the Project site where breeding burrows do not exist, construction activities will be performed during this season between February and early June. If construction activities, especially surface clearing and stripping are undertaken within the breeding season, it is important to check the breeding activities and presence of any breeding burrows, to be observed by the biologist. All bushes and especially old trees that are important for reproduction and 	Project Company EPC Contractor Subcontractors	Prior to Construction and through construction.	<ul style="list-style-type: none"> Construction Environmental and Social Management Plan; Biodiversity Management Plan Terrestrial Biodiversity Action Plan 	<ul style="list-style-type: none"> Biodiversity Management Plan is prepared and implemented. Terrestrial Biodiversity Action Plan is prepared and implemented. Evidences regarding implementation of the Biodiversity Management Plan and Terrestrial Biodiversity Action Plan; Training records of the personnel on the mitigation measures regarding protection of the flora species; Register regarding transfer of fauna species to the habitats defined in the BMP and Terrestrial BAP; Placement of the necessary wildlife warning and information signs, where needed.

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			<p>nesting will be protected as much as possible.</p> <ul style="list-style-type: none"> - Some food plants with fruits and/or seeds will be planted and some water sources will be supplied in the area to support birds during the dry seasons from mid-May to late November. - Birds cannot identify large glass-covered surfaces and striking on glass surfaces is an important cause of bird death. It is recommended that glass-covered buildings shall not be preferred for the design of the Project site. - Some of the bird species prefer to nest under roofs of buildings. Therefore, roof type and holes under roofs are important; and bird-friendly construction will be preferred specifically for birds and bats <ul style="list-style-type: none"> • Where vegetation clearing is required, thorough pre-clearing checks for all forms of fauna need to be conducted. A proactive approach will be used to prevent the loss of fauna without obstructing construction activities. The following procedures will be applied: • After cleaning the ground and transporting the amphibians, reptiles and mammals encountered on the construction site, surface soils will be striped carefully. While stripping, some amphibians, reptiles and mammals may be seen again in excavated soil. All these animals will be collected and transported to a suitable nearby habitat. • When animals are released to a new area, biologists should observe the area for predators until the animal digs into the soil for protection • During surface clearing and stripping activities in the construction phase expert biologists shall be present and accompany 				<ul style="list-style-type: none"> • Audit and inspection reports.

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			<p>the construction team. These biologists will collect all animals encountered and affected during the construction phase and transfer them to appropriate habitats around the Project site.</p> <ul style="list-style-type: none"> • If any active burrows are encountered during construction phase of the Project, a remarkable tape will be placed on the section/area, where burrow is encountered, and necessary signs will be placed. The construction activities on this section/area will be suspended, while construction activities in other sections of the Project site are continued. • Creating small puddles or semi-natural ponds in the Project site will enable amphibian species to breed in the area. • During excavation, soil stripping and ground preparing activities, attention shall be given to the storage of the excavated materials before its reuse and disposal off-site. Visual observation shall be undertaken in the sections where excavation materials will be stored temporarily, and it shall be ensured that the area is free of species and burrows. Once the sections have been observed to ensure that they are free of species and burrows, the area shall be enclosed with marking tape and storage of excavation material will be restricted to the observed sections. • The Project Company will ensure that construction workers shall be trained on conservation of biodiversity (i.e., important biodiversity species, important areas). • The driving speed should be limited to 30 km/h and honk should not be allowed to prevent wild animals from being crushed and disturbed by vehicles driving at the construction site. 				

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<ul style="list-style-type: none"> • Apply good site practices incorporating appropriate mitigation measures that reduce nuisance noise levels • Lighting for construction and security purposes will be inward and downward facing to minimise light pollution in remote areas, and to minimize the disturbance to nocturnal wildlife, birds and invertebrates. • Soil stripping activities conducted prior to construction activities shall be performed preferably before winter season to minimise impact on amphibians and reptiles latibulised in the ground. • Provided that soil stripping is conducted before winter season, construction activities may continue throughout the winter. • Particular attention should be given to the vulnerable <i>Testudo graeca</i> to prevent loss of individuals due to Project activities. This species will be screened before the commencement of the construction activities in the Project site. If this species is identified in the area, they will be carefully relocated/transported to another safe location. During the construction activities, relocation works for species will continue. • It is recommended not to carry out construction activities in the breeding period of birds between February and early June in order to reduce the damage on bird species. • It is noteworthy to mention that, in some parts of the Project site where breeding burrows do not exist, construction activities shall be performed during this season between February and early June. On the other hand, if the construction activities especially surface clearing and stripping are undertaken during the breeding season, it is important to check the breeding activities which will be followed by the biologist. 				

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<ul style="list-style-type: none"> • A biologist who is accompanying the construction team during tree cutting, vegetation cleaning and soil stripping activities, shall collect all mammal specimen, encountered at the construction site and affected by the construction activities, and transfer them to appropriate habitats around the Project site. • On the areas, where construction activities may be performed, the ground should be checked by biologist team for possible <i>Vormela peregusna</i> burrows. All burrows should be protected against any damage to be caused by construction activities, where possible. In cases where it is necessary to use the nest area, the animal should be allowed to move away safely or the animal should be caught by digging the nest and transported to the nearest suitable habitat. • All mammal nests in the area to be altered shall be carefully excavated and if there are any adult individuals or pups in the nest, they must be rescued without damage. During this relocation, artificial gallery entrances with a horizontal position, which may be up to 1 m long, should be excavated in order to hide the animals left in the transported area. • All <i>Nannospalax ehrenbergi</i> individuals shall be collected by experienced biologist team and be transferred to suitable habitat around Project site. • Awareness programs will be developed for staff and contractors to raise the awareness of the diversity of animals present, risks associated with large wildlife and how to react when confronted by different species of large wildlife, and requirements to actively prevent the loss of any animals including snakes and species commonly considered to be vermin. • Increase the awareness of drivers and equipment operators towards wildlife 				

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<p>conservation and encourage them to avoid or minimize animal fatalities</p> <ul style="list-style-type: none"> • The impacts due to poaching and intruders will be minimized through awareness creation among the employees and to the community of the area, setting regulations and employment obligations that prohibit poaching. • Biodiversity awareness creating measures will be taken both for the construction workers as well as to the surrounding community. Training will be delivered to constructions workers prior to the start and during construction works to increase their awareness and responsibilities concerning the surrounding natural values. • A communication strategy should be developed to provide education and awareness on biodiversity measures with local stakeholders, including project-affected communities and fishermen. This will be led by a team of public relations and social experts to manage local liaison. The aim will be to raise community awareness of local biodiversity values, actions undertaken by project company and its partners for the management of biodiversity impacts, to support local community members who may want to sustain local biodiversity value and ecosystem services • Lighting for construction and security purposes will be inward and downward facing to minimise light pollution in remote areas, and to minimize the disturbance to nocturnal wildlife, birds and invertebrates. • Reduce light contamination into natural habitats at night • Prohibit hunting, trapping and intentional killing of wild animals by the project workers and drivers. 				

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<ul style="list-style-type: none"> Faunal protection policies will be developed and enforced that prohibit all forms of hunting, any killing of animals and keeping of pets. Where free-ranging wildlife occurs, vehicle speeds will be reduced through implementation of speed control measures and the regular enforcement. 				
C.25	Sediment movement and impact on marine environment	IFC PS6, EBRD PR6	<ul style="list-style-type: none"> The filling area should be limited and should not be larger than the actual area that is needed; Spring season (i.e., March, April, May) and June is known as the season when the marine biological activity is maximum. Therefore, it is important to keep the filling activities at a minimum in that season. Noise, turbidity and mechanical effects might negatively affect the quantity and quality of marine organisms in spring period. On the contrary, biological activities are minimum during autumn and winter seasons; therefore, these periods might be considered for undertaking the marine construction works to minimise impacts; Filling works should not be undertaken during unsuitable wind, current and wave conditions; to minimise dispersion of the turbidity. Onsite excavated or offsite transported fill material shall be analysed against any contamination and hazardous content before use in order to prevent any adverse impact on marine sediments, water quality and aquatic life. Monitoring of marine environment twice a year during spring and autumn seasons shall be done in order to identify any potential impacts and take immediate measures. 	Project Company SPV for the Terminal Facility Subcontractors EPC Contractor	Prior to Construction and through construction.	<ul style="list-style-type: none"> Construction Environmental and Social Management Plan; Biodiversity Management Plan Marine Biodiversity Action Plan Surface Water and Wastewater Management Plan 	<ul style="list-style-type: none"> Biodiversity Management Plan is prepared and implemented. Marine Biodiversity Action Plan is prepared and implemented. Evidences regarding implementation of the Biodiversity Management Plan and Marine Biodiversity Action Plan; Excavated material filling records regarding location and amount of the material. Turbidity monitoring records during filling operation. Marine ecology monitoring implemented two

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
							times a year covering spring and autumn periods, and monitoring reports prepared. <ul style="list-style-type: none"> Audit and inspection reports.
C.26	Marine Fauna	IFC PS6 EBRD PR6	Marine Turtles: <ul style="list-style-type: none"> A number of nests were identified in Incirli beach; which necessitates application of a number of mitigation measures during development of the Project. Both Incirli beach and Holland beach (i.e., one of the nesting beaches for marine turtles as defined in Communique on Protection of Marine Turtles (2009/10)) are in the area that is likely to be affected by the Project activities. While the terrestrial activities might impact the <i>Chelonia mydas</i> (green turtle), in the marine section it is also highly likely that <i>Caretta caretta</i> (Loggerhead sea turtle) and <i>Chelonia mydas</i> (green turtle) are encountered; Activities to be conducted between April – September should be accompanied by an expert on marine turtles; In case of an accident involving marine turtles at the sea, the initial response should be given by the expert; Monitoring studies are conducted at Incirli beach not only during nesting season (May-October) but also regularly such as 3 times a month by the expert; The vessels should be used with very low speeds within 1 mile of the shore; No vehicle belonging to the project will be allowed to enter sea turtle nesting areas, especially during nesting periods; 		Prior to Construction and through construction.	<ul style="list-style-type: none"> Construction Environmental and Social Management Plan Biodiversity Management Plan Surface Water and Wastewater Management Plan 	<ul style="list-style-type: none"> Biodiversity Management Plan is prepared and implemented; Marine Biodiversity Action Plan is prepared and implemented; Evidences regarding implementation of the Biodiversity Management Plan and Marine Biodiversity Action Plan; Records regarding Monitoring of benthic organisms twice a year during spring and autumn seasons; Monitoring records regarding Sea Turtle activity at Incirli beach;

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<ul style="list-style-type: none"> The seaside will not be blocked in order to ensure the uninterrupted movement of the hatchlings to the sea; Avoid preventing the movement of adult turtles to their "nesting areas" with non-permanent structures; To avoid underwater and airborne sound effects, first of all, machines with advanced technical features will be used. Hole pile, vibro-pile or gravity pile are less noisy and will likely eliminate the possibility of harmful effects. Any technique that can be used can still cause disturbance to marine life and produce sound levels like ships; Lighting for construction and operation will be inward and downward facing to minimise light pollution in remote areas, and to minimize the disturbance to sea turtles; Reduce light contamination into natural habitats at night; The sightings of sea turtles near ships will be recorded by the ship operators and any incidents will also be reported; <p>Monk Seal:</p> <ul style="list-style-type: none"> The turbidity generation should be minimised by the use of silt fences. Mediterranean Monk Seal (<i>Monachus monachus</i>) is known to be flexible and adapt to changes in the environment; therefore, they will potentially move away from the region when the construction activities are initiated. It was determined by the experts that the Project activities will only have impacts of minor significance on the Mediterranean Monk Seal (<i>Monachus monachus</i>) and in that case further need emerges seasonal monitoring studies might be considered particularly to determine feeding potential of the Project site; Training should be given to all ship operators, alerting them to the possible presence of 				<ul style="list-style-type: none"> Evidence the use of silt fences; Audit and inspection reports.

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<p>marine species (i.e. sea turtles and Mediterranean monk seal) in the area and should be provided with guidelines for safe ship operation will such species be seen;</p> <ul style="list-style-type: none"> Ships should never deliberately approach, follow, or otherwise come into close contact with sea turtles and Mediterranean monk seal; <p>In general:</p> <ul style="list-style-type: none"> No dredging activity will be conducted for the jetty construction within the scope of the Ceyhan PDH-PP Project; on the other hand, the impact area of the dredging activities to be conducted as part of CPIR Port covers the Ceyhan PDH-PP Project site; it is suggested that certain mitigation measures are taken within the scope of CPIR Port Project such as use of silt fences, extending from sea bottom to the surface, around the dredging vessel; All necessary measures shall be taken during the construction phase to prevent contamination of marine environment by hazardous chemicals and wastes. Additionally, Project site Waste Management Plan shall be implemented to prevent dumping of any types of wastes or untreated discharges into the sea; After completion of the construction activities, the piles of the Jetty and the rocks to be filled will constitute a suitable living, nesting and feeding environment for biological environment. Filling these areas with the excavated materials from the same area should be favoured to the extent possible and the fill materials should not be easily dissolved in sea water; It should be ensured that there is no ballast water discharge in the port area and ballast water should be managed in accordance with the International Convention on the Control 				

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			and Management of Ship Ballast Water and Sediments (IMO).				
CULTURAL HERITAGE							
C.27	Cultural heritage, chance finds	IFC PS8, EBRD PR8, National legislation	<ul style="list-style-type: none"> A Cultural Heritage Management Plan (CHMP) and Chance Find Procedure will be prepared. CHMP and Chance Find Procedure that will be developed for the Project will be shared with the EPC Contractor and subcontractors. The Project Company will ensure that subcontractors will apply the abovementioned plan/procedure. The CHMP and Chance Find Procedure will apply to both terrestrial activities and marine activities (for associated facilities). The CHMP will cover measures related to protection of the ancient waterway; The provisions of the Chance Find Procedure will include notification of relevant competent bodies of found objects or sites; delivering training to the project personnel, including contractor and sub-contractor employees, on the procedures to follow in case chance finds are discovered; and securing the area of finds to avoid any further disturbance or destruction; As it is observed during the archaeological site survey, the ancient waterway is not visible in certain areas. Detailed research should be carried out during the pre-construction phase of the Project around the protection boundaries of the ancient waterway as determined by the Protection Board. The research will be conducted under the supervision of Adana Cultural Heritage Preservation Board and Adana Museum Directorate and can be initiated by cleaning, drilling and, if necessary, rescue works (including geophysical studies) at the area of the ancient waterway and protection zone; 	Project Company EPC Contractor Subcontractors SPV of Terminal Facility	Throughout construction.	<ul style="list-style-type: none"> Cultural Heritage Management Plan, including Chance Find Procedure 	<ul style="list-style-type: none"> Research carried out at the pre-construction phase in the ancient water pathway and protection zone under the supervision of Adana Cultural Heritage Preservation Board and Adana Museum Directorate is conducted; CHMP and Chance Find Procedure are prepared and implemented; CHMP and Chance Find Procedure are cascaded down to EPC Contractor and (sub)contractors; Measures to avoid/mitigate impacts on the ancient waterway are implemented; Evidence that subcontractors also apply the provisions of the

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<ul style="list-style-type: none"> Potential impacts due to Project activities during construction phase shall be prevented by the minimisation of vibration from the Project activities. Within that scope necessary measures will be taken during pile driving and blasting and relevant blasting designs shall be used. Furthermore, the project traffic and activities will be limited to designated roads and will be carried out only within the designated boundaries. 				abovementioned plan and procedure; <ul style="list-style-type: none"> Evidence that measures to mitigate vibration related to the Project activities is in place.

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
SOCIOECONOMICS							
C.28	Economy and employment	IFC PS2, EBRD PR2	<ul style="list-style-type: none"> Develop and implement HR Policy; Develop and implement Personnel Selection and Employment Procedure. This will include the aim to provide opportunities for employment of local workforce to the extent possible considering unskilled, semi-skilled and skilled workforce; Develop and implement Procurement Procedure. In particular, the procedure will cover issues related engagement of local contractors and subcontractors in order to maximize Project benefits; The Project will seek to maximize the benefits from the Project to local communities in terms of direct and indirect employment and purchasing of local goods and services during construction. This will include measures such as adopting local employment and purchasing policies, establishing tenders for procurement of subcontracted goods and services at a scale that local businesses can respond to, ensuring opportunities are advertised locally. 	Project Company EPC Contractor Subcontractors SPV of Terminal Facility	Throughout construction.	<ul style="list-style-type: none"> HR Policy; Personnel Selection and Employment Procedure; Labour and Working Conditions Management Plan; Procurement Procedure; Subcontractor Management and Monitoring Plan; Public and Worker Grievance Mechanism; Code of Conduct Work Permit Procedure HSE Discipline Procedure 	<ul style="list-style-type: none"> HR Policy is in place; Personnel Selection and Employment Procedure is in place; Procurement Procedure in place; HR Policy and Personnel Selection and Employment Procedure are cascaded down to the EPC Contractor and (sub)contractors; Evidence of implemented measures related to local employment (as per the Personnel Selection and Employment Procedure); Evidence of implemented measures related to local procurement (as per the Procurement Procedure).

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
C.29	Social Investment	IFC Good Practice Handbook “Strategic Community Investment”	<ul style="list-style-type: none"> Develop and implement Social Investment Plan in cooperation with affected communities. The investment activities will be developed in cooperation with affected communities and focused on the Project Social Area of Influence. 	Project Company	Throughout construction.	<ul style="list-style-type: none"> Social Investment Plan 	<ul style="list-style-type: none"> Social Investment Plan is developed; Evidence of consultations with affected communities; Evidence of implemented social investment activities.
C.30	Land acquisition, physical / economic displacement	IFC PS5 EBRD PR5	<ul style="list-style-type: none"> Conduct Land Acquisition Conduct Land Acquisition Gap Analysis to collect robust information on land acquisition and the status of economic and physical displacement conducted for the Project; Develop Livelihood Restoration Plan (LRP) and/or Resettlement Action Plan (RAP) as relevant; Ensure availability of grievance mechanism to stakeholders affected by land acquisition activities. 	Project Company SPV of Terminal Facility	Prior to construction phase	<ul style="list-style-type: none"> Land Acquisition Gap Analysis Report; Livelihood Restoration Plan / Resettlement Action Plan. 	<ul style="list-style-type: none"> Land acquisition gap analysis conducted; LRP/RAP is/are in place; Evidence of implementation of the LRP/RAP.
COMMUNITY HEALTH, SAFETY AND SECURITY							
C.31	Community health, safety and security	IFC PS4, EBRD PR4	<ul style="list-style-type: none"> Develop and implement Community Health, Safety and Security (CHSS) Plan for the Project construction stage; Develop and implement the Code of Conduct for Project workers; Develop and implement Accommodation Camp Management Plan to ensure that accommodation services of adequate quality are provided to the Project workers (including provision of leisure facilities, shops, etc.) to minimize contacts with local residents and avoid labour influx; Coordinate with BOTAS regarding potential impacts on Incirli community and Incirli beach; 	Project Company EPC Contractor Subcontractors SPV of Terminal Facility	Construction phase	<ul style="list-style-type: none"> Community Health, Safety and Security Plan; Code of Conduct; Accommodation Camp Management Plan; Stakeholder Engagement Plan; Emergency Preparedness 	<ul style="list-style-type: none"> CHSS Plan is in place; Code of Conduct is in place; Other described plans are in place; Evidence that described documents are cascaded down to Project (sub)contractors and implemented;

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<ul style="list-style-type: none"> Conduct information disclosure and consultation activities with communities and other stakeholders in line with the Stakeholder Engagement Plan (SEP); Develop and implement EPRP; Develop and implement Construction Traffic Management Plan; A grievance mechanism will be in place that will enable the community to raise concerns during the lifetime of the Project. 			and Response Plan; <ul style="list-style-type: none"> Construction Traffic Management Plan. 	<ul style="list-style-type: none"> Evidence that grievance mechanism is implemented and that affected communities and other stakeholders are adequately informed on its functioning.
C.32	Lighting and visual impact	IFC PS4, EBRD PR4	<ul style="list-style-type: none"> The activities will be carried out at normal marine and weather conditions, impacts of lights and signals of vessels installed in order to ensure navigation, environment, life and property safety and security will be temporary as they are limited to duration of the construction; The placement of temporary construction camps should be considered in order to not negatively influence the perception of the facility; Secondary visual impacts associated with the construction phase, such as the sight of construction vehicles, dust and excavated materials should be managed to reduce visual impacts. The use of dust-suppression techniques on the access roads (where required) and the timely removal of wastes will assist in doing this; Potential light impacts will be minimized by minimising exterior lighting of vessels and reducing lighting density (except from navigational and safety lighting) (e.g., usage of timer where appropriate) during construction of the jetty 	Project Company EPC Contractor Subcontractors SPV of Terminal Facility	Throughout construction.	<ul style="list-style-type: none"> Procedure For Control of Life Critical Activities; Scaffold Safety Procedure; Emergency Preparedness and Response Plan. 	<ul style="list-style-type: none"> Evidence of measures implemented; Evidence that grievance mechanism is implemented and that affected communities and other stakeholders are adequately informed on its functioning. EHSS Policy is in place; Relevant personnel are hired for the implementation of the ESMS; Evidence that relevant policies/plans are adopted by the EPC Contractor; Monitoring records during construction;

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<ul style="list-style-type: none"> The entire construction site will be lit for safety and security reasons except from the time periods where the construction is stopped in certain periods. Proper planning and placement of light fixtures in order to reduce visual impacts associated with glare and light trespass. 				<ul style="list-style-type: none"> Audit and inspection reports.
C.33	Dust and noise impacts on the nearby community	IFC PS4, EBRD PR4	<ul style="list-style-type: none"> An Air Quality Control and Monitoring Plan will be prepared and implemented during the construction phase of the Project; Transfer roads will be sprayed with water as necessary (for example using mobile watering bowsers) to prevent significant dust emissions especially in dry weather conditions; A Noise Control and Monitoring Plan will be prepared and implemented during the construction phase of the Project; The Project Company will develop and implement a CHSS Plan, with commitments to implement the following key measures to protect the community from adverse effects during construction: noise, dust, other emissions risks with material and hazardous substances and accidents; Construction activities will be planned in a way considering the nearby communities and necessary consent will be obtained from Adana Provincial Directorate of Environment and Urbanization for undertaking construction activities during evening and night time, if needed; The Project Company will develop and implement Construction TMP (see above). 	Project Company EPC Contractor Subcontractors SPV of Terminal Facility	Throughout the construction stage	<ul style="list-style-type: none"> Air Quality Control and Monitoring Plan; Community Health, Safety and Security Plan; Construction TMP; Noise Control and Monitoring Plan; Emergency Preparedness and Response Plan. 	<ul style="list-style-type: none"> Air Quality Control and Monitoring Plan is in place; Noise Control and Monitoring Plan is in place; CHSS is in place; Construction TMP is in place; Evidence that described documents are cascaded down to Project (sub)contractors and implemented; Evidence that grievance mechanism is implemented and that affected communities and other stakeholders are adequately informed on its functioning.
C.34	Life and fire safety	IFC PS4, EBRD PR4,	<ul style="list-style-type: none"> Emergency Preparedness and Response Plan will be prepared and implemented. 	Project Company	Prior to and during	<ul style="list-style-type: none"> Emergency Preparedness 	<ul style="list-style-type: none"> Emergency Preparedness

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
		National legislation	<p>A Life and Fire Safety Procedure will be prepared under EPRP;</p> <ul style="list-style-type: none"> Project shall adopt standards related with national fire protection association (NFPA) and instrumentation, control and safety systems (i.e., Instrumentation, Systems and Automation society (ISA), American Petroleum Institute (API) and Engineering Equipment and Materials User Association (EEMUA)). The local code and standards are Turkish Standard (TS) TS4943: Safety standards in crude oil and petroleum products storage tank farms, TS 862: standard for hand fire extinguishers, TS International Organization for Standardization (ISO) 15420: Standard for gas extinguishing systems. Necessary precautions will be undertaken for the on-site offices and worker's accommodation areas. The Workers' Accommodation Plan will include fire and emergency response provisions. A fire audit shall be conducted by a fire expert in the workers offices and accommodation areas and positive opinion shall be secured from the expert. 	EPC Contractor Subcontractors SPV of Terminal Facility	construction phase	<p>and Response Plan;</p> <ul style="list-style-type: none"> Fire Safety Procedure; Accommodation Camp Management Plan. 	<p>and Response Plan is prepared and implemented.</p> <ul style="list-style-type: none"> Life and Fire Safety Procedure is prepared and implemented; Accommodation Camp Management Plan includes fire and emergency response provisions; Confirmation of fire safety of offices and accommodation area related to construction is conducted; Emergency response equipment is easily accessible, in place and in working condition.

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
C.35	Security	IFC PS4, EBRD PR4, Best Practice, National legislation	<ul style="list-style-type: none"> A Security Management Plan will be developed to be implemented. Security will be provided in a manner that does not jeopardise community's safety or Project Company's relationship with the community and that is consistent with national requirements and international standards. A special Code of Conduct for the guidance and counselling of the Security Personnel will be prepared; International best practice will be applied for hiring, training and mobilising security staff. Project Company will ensure that security personnel have not been involved in past abuses and are adequately trained. Force will only be sanctioned in preventive or defensive circumstances in proportion to the threat and security will operate within the law; The grievance mechanism will allow communities and workers to express concerns regarding security issues and behaviour of security personnel. 	Project Company EPC Contractor Subcontractors SPV of Terminal Facility	Throughout the construction phase	<ul style="list-style-type: none"> Security Management Plan; Code of Conduct for security personnel. 	<ul style="list-style-type: none"> Security Management Plan; Code of Conduct for security personnel; Evidence that these documents are cascaded down to Project (sub)contractors and implemented; Evidence that grievance mechanism is implemented and that affected communities and other stakeholders are adequately informed on its functioning.
LABOUR AND WORKING CONDITIONS							
C.36	HR Policy	IFC PS2, EBRD PR2, PR4 Best Practice	<ul style="list-style-type: none"> Develop and implement HR Policy in line with the IFC PS 2; Develop and implement Code of Conduct for workers; Ensure the HR Policy is cascaded down to the EPC Contractor and (sub)contractors and implemented throughout the Project. 	Project Company EPC Contractor Subcontractors SPV of Terminal Facility	Prior to construction phase	<ul style="list-style-type: none"> HR Policy; Code of Conduct. 	<ul style="list-style-type: none"> HR Policy is in place; Code of Conduct for workers is in place; Evidence that described documents are cascaded down to Project (sub)contractors and implemented.

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
C.37	Labour and working conditions	IFC PS2, EBRD PR2, National legislation	<ul style="list-style-type: none"> Develop and implement Labour and Working Conditions Management Plan, including: <ul style="list-style-type: none"> Personnel Selection and Employment Procedure; Worker Grievance Mechanism. 	Project Company EPC Contractor Subcontractors SPV of Terminal Facility	Prior to construction phase	<ul style="list-style-type: none"> Labour and Working Conditions Management Plan; Personnel Selection and Employment Procedure. 	<ul style="list-style-type: none"> Labour and Working Conditions Management Plan is in place and implemented; Evidence of implementation of the Personnel Selection and Employment Procedure; Evidence of implementation of the grievance mechanism.
C.38	Worker Grievance Mechanism	IFC PS2, EBRD PR2	<ul style="list-style-type: none"> Worker Grievance Mechanism will be developed and will: <ul style="list-style-type: none"> be open to all the Project workers (including contractors' workers); be easily accessible by workers; be free of retribution; allow anonymous complaints to be raised and addressed; Employees will be informed about this mechanism at the time of hiring and through regular training. 	Project Company EPC Contractor Subcontractors SPV of Terminal Facility	Prior to and during construction phase	<ul style="list-style-type: none"> Labour and Working Conditions Management Plan; Worker Grievance Mechanism. 	<ul style="list-style-type: none"> Labour and Working Conditions Management Plan is prepared; Worker Grievance Mechanism in Place; Evidence showing that EPC Contractor and other subcontractors adopted relevant procedures regarding Worker Grievance Mechanism; Training records on Worker Grievance Mechanism;

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
							<ul style="list-style-type: none"> Grievance Boxes and forms are in place; Grievance database / Register in place (including records of grievances, corresponding responses and resolution measures).
C.39	Occupational health and safety	IFC PS2, EBRD PR2, and PR4, National legislation	<ul style="list-style-type: none"> Development and implementation of the Construction Occupational Health and Safety Management Plan (COHSMP) in line with applicable national health and safety legislation and international standards (IFC PS2 and EBRD PR4); Dust emissions and noise generation will be minimised to the extent possible with implementation of the mitigation measures; Workers (including subcontractors) will be provided safety briefings every day before the work starts and provided with necessary personal protective equipment. Work permits will be required for high-risk activities such as working at height, operation of heavy equipment and similar; All workers (including subcontractors) will be trained on health and safety, and EPRP to respond timely to the incidents. All accidents and incidents will be recorded; The efficiency of health and safety practices will be monitored through internal and external audits and corrective actions will be taken if required. 	Project Company EPC Contractor Subcontractors SPV of Terminal Facility	Prior to and during construction phase	<ul style="list-style-type: none"> Labour and Working Conditions Management Plan, including Worker Grievance Mechanism; Construction Occupational Health and Safety Management Plan and its procedures; Subcontractor Management and Monitoring Plan Accommodation Camp Management Plan. 	<ul style="list-style-type: none"> COHSMP is prepared; Evidence of implementation of the COHSMP; Training records; Incident and accident records; Daily toolbox talks' records; Internal and external audit reports; Evidence of providing proper and sufficient PPE for the workers; Work permit procedure is in place. Records on work permits.

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
C.40	Subcontractors and suppliers	IFC PS2, EBRD PR2 and PR4	Subcontractors will also be required to follow the requirements of IFC PS2 and EBRD PR4. Contracts to be signed with subcontractors will include EHSS requirements. A "Subcontractor Management and Monitoring Plan" will be prepared and implemented by Project Company.	Project Company EPC Contractor Subcontractors SPV of Terminal Facility	Prior to and during construction phase	<ul style="list-style-type: none"> HR Policy; Subcontractor Management and Monitoring Plan; Subcontractor HSE Assessment Procedure; Procurement Procedure; Supply Chain Management Plan. 	<ul style="list-style-type: none"> HR Policy is in place; Evidence that described documents are cascaded down to Project (sub)contractors and implemented.
C.41	Workers' accommodation	IFC PS2, EBRD PR2	Workers' accommodation will be managed in line with the provisions of IFC PS2 and EBRD PR2 provisions, and the Guidance Note on Workers' Accommodation published by IFC and EBRD (Workers' Accommodation: Processes and Standards). Accommodation Camp Management Plan (ACMP) will be developed by Project Company.	Project Company EPC Contractor Subcontractors SPV of Terminal Facility	Throughout construction	<ul style="list-style-type: none"> Accommodation Camp Management Plan; Occupational Health and Safety Management Plan; Labour Management Procedure including Worker Grievance Mechanism. 	<ul style="list-style-type: none"> ACMP is prepared and implemented; Evidence that provisions of the ACMP are implemented with regard to accommodation services provided to (sub)contractors' workers; Audit and inspection records of accommodation camp; Records of Worker Grievances.
STAKEHOLDER ENGAGEMENT							
C.42	Information Disclosure/ Stakeholder	IFC PS1, EBRD PR10	<ul style="list-style-type: none"> Implement Stakeholder Engagement Plan (SEP) and Grievance Mechanism; 	Project Company	Throughout construction	<ul style="list-style-type: none"> Stakeholder Engagement Plan 	<ul style="list-style-type: none"> SEP is prepared and implemented;

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
	Engagement/Community Grievances		<ul style="list-style-type: none"> • SEP to be updated annually and if there are significant changes in the Project; • Publicise SEP and Grievance Mechanism, including information on contact details of responsible staff to handle grievances. • Community Liaison Officer shall be appointed to monitor surrounding communities' complaints related to the construction activities and maintain relationships with affected communities. 	SPV of Terminal Facility			<ul style="list-style-type: none"> • ESIA and SEP are disclosed at the Project website and available at Project Offices; • Evidence showing that stakeholder engagement activities (i.e. meeting notes with stakeholders, announcements regarding traffic, construction schedule, employment opportunities etc.) are performed according to the SEP; • Evidence that SEP is regularly reviewed and updated; • Evidence showing that affected communities and other stakeholders are effectively informed on the grievance mechanism; • Grievance database / Register in place (including

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
							records of grievances, corresponding responses and resolution measures).

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Table 2. Operation Phase Environmental and Social Management Plan (ESMP)

Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
GENERAL							
O.1	Environmental and Social Management system	IFC PS1, EBRD PR1	Operation phase Environmental and Social Management System (ESMS) will be developed in line with international good practice and guidelines (i.e., ISO 14001: 2004 – Environmental Management System, ISO 45001: 2018– Occupational Health and Safety Management System). The list of management plans at the operation stage is determined by the ESIA document (Chapter 17) and is also copied to/provided at the appendix of this document.	Project Company O&M PDH-PP Company SPV of Terminal Facility O&M Terminal Facility Company	Prior to operation and throughout the operation.	<ul style="list-style-type: none"> • EHSS Policy • HR Policy • Plans and procedures - see Appendix 	<ul style="list-style-type: none"> • EHSS Policy and HR Policy are in place; • Relevant personnel are hired for the implementation of the ESMS; • Site specific environmental and social plans/procedures are prepared; • Evidence that relevant policies/plans are adopted by the Project contractors; • Monitoring records during operation; • Training records prior to/during operation; • Audit and inspection reports.
O.2	Permitting	National legislation	All necessary permits/consents/approvals will be obtained in accordance with the national legislation.	Project Company O&M PDH-PP Company SPV of Terminal Facility O&M Terminal Facility Company	Prior to the date when temporary operation permit is obtained and as relevant during operation	<ul style="list-style-type: none"> • Permit Register 	<ul style="list-style-type: none"> • Permit register is prepared; • Permits are in place. (i.e. Building Use Permit, Temporary Operation Permit for first year, Operation Permit, Environmental Permit etc.)
O.3	Life Cycle Assessment (LCA)	IFC PS3, Best Practice	<ul style="list-style-type: none"> • Implement measures described in the LCA Report; • Carry out a new LCA study after a few years of operation of the plant, in order to evaluate the actual environmental impacts 	Project Company O&M PDH-PP Company	Throughout the operation	<ul style="list-style-type: none"> • LCA Report 	<ul style="list-style-type: none"> • Evidence of implementation of measures described by the LCA Report;

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			based on real operational data of the plant, thus being able to identify potential further improvement actions.				<ul style="list-style-type: none"> Results of the new LCA study.
O.4	Climate Change Risk Assessment (CCRA)	IFC PS1, Best Practice	<ul style="list-style-type: none"> Implement measures described in the CCRA Report. 	Project Company O&M PDH-PP Company	Throughout the operation	<ul style="list-style-type: none"> CCRA Report 	<ul style="list-style-type: none"> Evidence of implementation of measures described in the CCRA Report.
O.5	Life and Fire Safety Plan	IFC PS4, EBRD PR4	The life and fire safety experts who prepared the plan will also undertake a review at the time of life and fire safety systems testing and commissioning and certify that construction of life and fire safety system has been carried out in accordance with the accepted design and master plan. Ensure that adequate emergency evacuation plan, training plan, regular checking of life and fire safety systems are in place for operation phase. All provisions for disability access will be in place in compliance with international standards.	Project Company O&M PDH-PP Company SPV of Terminal Facility O&M Terminal Facility Company	Prior to operation.	<ul style="list-style-type: none"> Operation Emergency Preparedness and Response Plan; Life and Fire Safety Plan. 	<ul style="list-style-type: none"> Operation Emergency Preparedness and Response Plan is prepared and implemented. Life and Fire Safety Plan and certificate are in place.

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
GEOLOGY, SOILS AND CONTAMINATED LAND							
O.6	Spills/accidents and contaminated land (General)	IFC PS3, EBRD PR3, National legislation, Best Practice, SEVESO, BEKRA	<ul style="list-style-type: none"> Hazardous and non-hazardous materials and wastes during operation will be handled according to the Environmental and Social Management System to be prepared by Project Company and where needed, further site-specific management plans will be developed (e.g., Hazardous Material Management Plan); Drummed hazardous materials with a total volume equal or greater than 1,000 L will be stored in areas with impervious floor that are sloped or surrounded with berms to contain a minimum of 25 % of the total storage volume. Drip trays will be used for fuelling mobile equipment; Appropriate secondary containment structures consisting of berms, dikes, or walls to contain at least 110 percent of the largest tank or 25% percent of the combined tank volumes will be provided at tank farms with above-ground tanks with a total storage volume equal or greater than 1,000 L. Secondary containment will be made of impervious, chemically resistant material; Any spillages from handling fuel and liquids will be immediately contained on site and the contaminated soil will be removed from the site for suitable treatment and disposal; Periodical reconciliation of tank contents shall be conducted, and visible portions of tanks and piping shall be inspected for leaks; For underground storage tanks and underground piping double-walled, composite, or specially coated storage and piping systems shall be used. For double-walled systems a leak detection system should be installed between two walls; 	Project Company O&M Company SPV of Terminal Facility	Throughout operation.	<ul style="list-style-type: none"> Operation Phase Environmental and Social Management Plan; Operation Emergency Preparedness and Response Plan; Operation Soil Management Plan; Operation Hazardous Material Management Plan; Accident and Incident Management Procedure (operation); Hazard and Risk Management Procedure (operation). 	<ul style="list-style-type: none"> Operation Emergency Preparedness and Response Plan is prepared; Emergency spill kits are in place, in good condition and ready for use; Periodic (e.g., daily and/or weekly) facility inspections are performed to check any contamination, leak or spill; Periodic (e.g., daily and/or weekly) site inspections are performed to ensure all tanks, equipment and vehicles are in intact condition and do not create any leaks; Hazardous material storage registers are prepared; Designated hazardous material and waste storage areas are constructed according to the defined mitigation measures as well as standards; Training records; Incident records; Audit and inspection reports.

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<ul style="list-style-type: none"> • Secondary containment, drip trays or other overflow and drip containment measures shall be provided, for hazardous materials containers at connection points or other possible overflow points; • Operation of a closed drainage system and implementation of Emergency Preparedness and Response Plan in the event of spills, fire etc. will prevent significant impacts on soil: <ul style="list-style-type: none"> ○ Audits and inspection programs to maintain the mechanical integrity and operability of pressure vessels, tanks, piping systems, relief and vent valve systems, containment infrastructure, emergency shutdown systems, controls and pumps, and associated process equipment shall be implemented; ○ In line with the preferred strategy of the reduction of the contamination level (EHS Guideline 1.8 Contaminated Land), the storage of chemicals, hazardous materials, and other potential contaminants will be kept at a minimum as practically feasible for the operation works. 				
HYDROLOGY AND HYDROGEOLOGY							
O.7	Protection of surface and groundwater	IFC PS3; EBRD PR3; Best Practice; National legislation; official correspondence by the DSI; and requirements by 1/1,000 scaled Implementation Zoning Plan.	<ul style="list-style-type: none"> • A Hazardous Material Management Plan and Program should be developed to ensure proper handling of hazardous materials including spill prevention and control plans during operation of Project; • The mitigation measures discussed under the title Material Resources and Waste Management (Ref No: O.7 through O.9) will be implemented. The mitigation measures are specific to different waste types for suitable management including storage, transport and disposal of waste materials generated during operation; 	Project Company O&M Company SPV of Terminal Facility	Throughout operation.	<ul style="list-style-type: none"> • Project drainage management Plans including Drainage and Wastewater Gathering Philosophy and Specification for Drainage; 	<ul style="list-style-type: none"> • Operation Emergency Preparedness and Response Plan is prepared; • Operation Surface Water and Wastewater Management Plan is prepared. • Register for wastewater discharges;

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<ul style="list-style-type: none"> • Direct waste and wastewater discharges to environment will be prevented; • A site drainage management plan will be in use for handling, management and adequate disposal of all types of effluent streams; • No surface or groundwater abstraction is planned for the water supply of the Project. Project water demand for the operation phase will be supplied from the water transmission line planned for the regional water supply from the Aslantaş Dam; <ul style="list-style-type: none"> ○ In the case of the need for groundwater extraction, any necessary permits in the scope of relevant legislation will be obtained first. • As per the provisions in the Investigation and Explanation Report of the Adana Ceyhan Energy Specialized Industrial Zone 1/1,000 scaled Implementation Zoning Plan and the requirements identified by DSI through their official correspondences with the CPIR Port within the scope of the CPIR Port EIA study will be followed. In that respect the following requirements will be followed: <ul style="list-style-type: none"> ○ All activities other than maintaining the canal structure or road maintenance, are prohibited on the dry riverbed; ○ The provisions of the Water Pollution Control Regulation (Official Gazette (O.G.) date/no: 31.12.2004/25687) and Regulation on the Protection of Drinking and Utility Water Basin (O.G. date/no: 28.10.2017/30224) shall be followed; ○ In case of any groundwater use, the groundwater sources in the vicinity of the CPIR Project site as well as their purpose of use shall be assessed. Groundwater flow shall be studied. 			<ul style="list-style-type: none"> • Operation Phase Environmental and Social Management Plan; • Operation Surface Water and Wastewater Management Plan • Operation Emergency Preparedness and Response Plan; • Operation Hazardous Material Management Plan; • Accident and Incident Management Procedure (operation); • Hazard and Risk Management Procedure (operation). 	<ul style="list-style-type: none"> • Wastewater discharge transfer records and permit is in place; • Emergency spill kits are in place, in good condition and ready for use; • Periodic (e.g., daily and/or weekly) site inspections are performed to check any contamination, leak or spill; • Periodic (e.g., daily and/or weekly) site inspections are performed to ensure all tanks, equipment and vehicles are in intact condition and do not create any leaks; • Hazardous material storage registers are prepared; • Designated hazardous material and waste storage areas are constructed according to the defined mitigation measures as well as standards; • Incident records; • Audit and inspection reports.

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<p>Hence, potential impacts on aquifers, and groundwater wells at the site shall be assessed and mitigation measures shall be proposed;</p> <ul style="list-style-type: none"> ○ Necessary mitigation measures shall be undertaken against spills in order to prevent risks related to groundwater contamination; ○ In the case of the use of any springs in the vicinity of the Project site (if available), necessary mitigation measures shall be taken to protect the quality of the spring water; ○ Necessary applications concerning permits and official consultations shall be made to the relevant authority if wastewater generated from onsite activities is required to be discharged to the receiving environment after treatment. 				

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
O.8	Spill response for Terrestrial Operation	IFC PS3, EBRD PR3, Best Practice, National legislation	<ul style="list-style-type: none"> All staff and subcontractors will be required to report any incidents. Incident reports will be subject to investigation, and remedial and preventive actions will be taken as needed; An Emergency Preparedness and Response Plan (EPRP) shall be developed to ensure mitigation of spills from hazardous materials during operation of the Project; Operation of a closed drainage system and implementation of EPRP in the event of spills, fire etc. will prevent significant impacts; Regular periodic integrity testing for hazardous material storage equipment (i.e., storage tanks and piping systems) will need to be conducted and appropriate leak detection systems will be in place; Drummed hazardous materials with a total volume equal or greater than 1,000 L will be stored in areas with impervious floors that are sloped or surrounded with berms to contain a minimum of 25 % of the total storage volume. Drip trays will be used for fuelling mobile equipment; Any spillages from handling fuel and liquids will be immediately contained on site and the contaminated soil removed from the site for suitable treatment and disposal; Periodical reconciliation of tank contents shall be conducted, and visible portions of tanks and piping shall be inspected for leaks; For underground storage tanks and underground piping double-walled, composite, or specially coated storage and piping systems shall be used. For double-walled systems a leak detection system should be installed between two walls; Appropriate spill response kits including absorbent materials will be present on site; 	Project Company O&M Company	Throughout operation.	<ul style="list-style-type: none"> Operation Phase Environmental and Social Management Plan; Operation Emergency Preparedness and Response Plan; Operation Surface Water and Wastewater Management Plan; Accident and Incident Management Procedure (Operation); Operation Hazardous Material Management Plan; Hazard and Risk Management Procedure (Operation). 	<ul style="list-style-type: none"> Operation Emergency Preparedness and Response Plan is prepared; Operation Surface Water and Wastewater Management Plan is prepared; Emergency spill kits are in place, in good condition and ready for use; Periodic (e.g., daily and/or weekly) site inspections are performed to check any contamination, leak or spill; Periodic (e.g., daily and/or weekly) site inspections are performed to ensure all tanks, equipment and vehicles are in intact condition and do not create any leaks; Hazardous material storage registers are prepared; Designated hazardous material and waste storage areas are constructed according to the defined mitigation measures as well as standards; Incident records; Audit and inspection reports.

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<ul style="list-style-type: none"> • Spill response will take place as quickly as possible. Contaminated materials will be collected and sent to appropriate disposal facilities; • Hazardous material inventories on site will be reduced through inventory management in order to reduce or eliminate potential releases during accidental incidents or emergency conditions; • It will be ensured that the personnel, responsible for the management of hazardous materials and wastes, have the necessary and appropriate training. 				

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
O.9	Spill response for Marine Operation	IFC PS3, EBRD PR3, Best Practice, National legislation	<ul style="list-style-type: none"> • Produce water, jetty washing and rain-water treatment systems at Associated Terminal Facility in accordance with the provisions of "International Convention for the Prevention of Pollution from Ships (MARPOL)". • Management of the flare system to minimize routine fugitive emissions and avoid release of liquid hydrocarbons via this open system • Prepare a Spill Response Plan for Jetty operations in accordance to "Implementation Regulation of the Law on The Principles Of Intervention in Emergencies and Compensation of Damages in Pollution Of The Marine Environment With Oil And Other Harmful Substances. In line with this plan, to establish sufficient equipment required for spill response. • Maintenance of a regularly tested Spill Response system and associated Spill Response Plan to eliminate or minimize the adverse effects of unexpected sea and coast oil pollution incidents, so as to: <ul style="list-style-type: none"> ○ Protect the environment; ○ Protect the interests of the local community; ○ Enhance employees' safety; ○ Accelerate return to normal operation of the facilities; These goals are met by: ○ Minimizing the spread of the oil spill by having sufficient booms to contain the largest spill 3 hours after its formation; ○ Recovering oil from the sea into a barge with capacity for the largest spill possible; ○ Protecting the most critical coastlines by deployment of additional ○ booms/dispersants as appropriate; 	SPV of Terminal Facility	Throughout operation.	<ul style="list-style-type: none"> • Operation Phase Environmental and Social Management Plan; • Spill Response Plan; • Operation Emergency Preparedness and Response Plan; • Surface Water and Wastewater Management Plan; • Accident and Incident Management Procedure (Operation); • Hazardous Material Management Plan (Operation); • Hazard and Risk Management Procedure (Operation); 	<ul style="list-style-type: none"> • Operation Emergency Preparedness and Response Plan is prepared; • Spill Response Plan is prepared. • Emergency spill kits are in place, in good condition and ready for use; • Periodic (e.g., daily and/or weekly) site inspections are performed to check any contamination, leak or spill; • Periodic (e.g., daily and/or weekly) site inspections are performed to ensure all tanks, equipment and vehicles are in intact condition and do not create any leaks; • Hazardous material storage registers are prepared; • Designated hazardous material and waste storage areas are constructed according to the defined mitigation measures as well as standards; • Balast Management Plan of the marine tanker is in place. • Balast and wastewater disposal records of the marine tankers.

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<ul style="list-style-type: none"> o Decontamination of the shoreline of any residual oil not removed whilst the spill is offshore; • The operational readiness of the spill response mechanism is ensured by the training of personnel, the use of special equipment and the means to combat pollution and is maintained through regular exercises in readiness based on hypothetical accident scenarios. • The Plan is authorized by decision of relevant harbour authority (i.e. BOTAŞ Port Authority) and then is communicated to all operator of the other neighbouring facilities (i.e Isken, BOTAŞ, BTC and Toros). 				<ul style="list-style-type: none"> • Incident records; • Audit and inspection reports.
MATERIAL RESOURCES AND WASTE MANAGEMENT							
O.10	Supply of materials	Best Practice	<ul style="list-style-type: none"> • Recycled materials and materials certified as eco-friendly and low carbon will be used to the extent possible; • Materials will be sourced from locations as close as possible to the Project site so as to minimise the impact of transportation route and distance. Where feasible, local suppliers will be prioritised for the procurement of materials and services to increase local benefits. 	Project Company O&M Company SPV of Terminal Facility	Throughout operation.	<ul style="list-style-type: none"> • Operation Phase Environmental and Social Management Plan; • Subcontractor Management Plan; • Supply Chain Management Plan; • Purchasing and Supplier Evaluation Procedure; 	<ul style="list-style-type: none"> • Subcontractor Management Plan is prepared; • Supply Chain Management Plan is prepared; • Subcontractor evaluation records in accordance to the Supply Chain Management Plan are in place; • Subcontractor periodic (at least yearly) inspection records in accordance to the Supply Chain Management Plan are in place; • Audit and inspection reports.

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
O.11	Waste Generation and Management (Terrestrial)	IFC PS3, EBRD PR3, National legislation	<ul style="list-style-type: none"> • All wastes during operation will be managed in line with the WMP that will be developed for the Project operation phase; • All the waste will be collected, segregated, labelled and stored on site according to the requirements by relevant Turkish regulations which address waste minimisation, segregation, labelling, storage, transportation and recycling/disposal; • Appropriate containment shall be used during temporary storage of wastes; • Record keeping will be done for all waste generation, onsite storage and waste transportation activities to third party waste management facilities; • Periodic inspections will be conducted in the waste recycling/disposal facilities to ensure proper disposal practices are implemented; • The waste management practices given in the IFC EHS Guideline for Petroleum-based Polymers Manufacturing (2007) and EBRD Sub-sector E&S Guidelines for Manufacture of Plastics and Synthetics (2014)) will be followed: <ul style="list-style-type: none"> ○ A Hazardous Material Management Program including spill prevention and control plans shall be prepared and implemented; ○ i) recycling and reuse of the solid polymers, where possible, ii) treatment to remove and separately recover Volatile Organic Carbons (VOCs) (e.g. by steam stripping), iii) segregation and storage in a safe manner due to the unstable nature of the materials are recommended; ○ Recondition and reuse solvents and catalysts shall be ensured, where possible; • Where possible, it shall be ensured to recover heat and energy from processes to 	Project Company O&M Company	Throughout operation.	<ul style="list-style-type: none"> • Operation Phase Environmental and Social Management Plan; • Operation Waste Management Plan; • Operation Hazardous Material Management Plan 	<ul style="list-style-type: none"> • Operation Waste management plan is prepared and implemented; • Periodic site inspections (daily and weekly) are performed to ensure that all wastes are separately collected, segregated, labelled and stored in designated areas; • Waste register including type, amount, disposal method, transfer record and disposal site is prepared. • All wastes are transferred and/or disposed to licenced /permitted disposal sites or companies. • Waste disposal sites/companies are periodically (at least yearly) audited by the Project Company or O&M Company. • Declaration records made to the Ministry of Environment, Urbanization and Climate Change (MoEUCC) are annexed to the Waste Register; • All waste manifests are in order and ready for review during the audits of the Provincial Directorate of Environment, Urbanization, and

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			reuse in the Project site. Thermal efficiency shall be improved to minimise heat loss; <ul style="list-style-type: none"> Emulsion and suspension polymerization aids should be selected with consideration of their biodegradability, as they may enter the wastewater stream during polymer recovery; 				Climate Change (PDoEUCC); <ul style="list-style-type: none"> Training records. Audit and inspection reports.
O.12	Waste generation and management (Marine)	IFC PS3, EBRD PR3, National legislation	<ul style="list-style-type: none"> The Associated Terminal Facility is not planned to have a waste reception facility. However, the operating company of the Terminal Facility is expected to make necessary communications and agreements with the waste reception facility to be operated by Adana Metropolitan Municipality. All wastes created within the associated Terminal Facility are expected to be disposed of in accordance with the related legislations and the provisions of MARPOL 73/78 by the operating company of the Terminal Facility. 	SPV of Terminal Facility	Throughout operation.	<ul style="list-style-type: none"> Operation Phase Environmental and Social Management Plan; Operation Waste Management Plan; Operation Hazardous Material Management Plan 	<ul style="list-style-type: none"> Operation Waste management plan is prepared and implemented; Periodic site inspections (daily and weekly) are performed to ensure that all wastes are separately collected, segregated, labelled and stored in designated areas; Waste register including type, amount, disposal method, transfer record and disposal site is prepared. All wastes are transferred and/or disposed to licenced /permitted disposal sites or companies. Waste disposal sites/companies are periodically (at least yearly) audited by the SPV of Terminal Facility. Declaration records made to the Ministry of Environment, Urbanization and Climate Change (MoEUCC) are annexed to the Waste Register; All waste manifests are in order and ready for

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
							review during the audits of the Provincial Directorate of Environment, Urbanization, and Climate Change (PDoEUCC); <ul style="list-style-type: none"> • Training records; • Audit and inspection reports.
O.13	Wastewater (Terrestrial)	IFC PS3, EBRD PR3, National legislation	<ul style="list-style-type: none"> • Domestic and industrial wastewater to be generated during the operation phase of the Project will be collected separately depending on the characteristics of wastewater in accordance with the provisions of the “Drainage and Wastewater Gathering Philosophy” and “Specification for Drainage” and will be treated in the WWTP to be established in the Project site; • A stormwater and wastewater drainage and collection system will be established on site to collect and manage uncontaminated and contaminated drainages separately; • For the collection of site drainage non-oily sewer system (NOS), possibly oily contaminated sewer (POCS), oily water sewer (OWS) and sanitary sewer system (SS) will be established to collect and treat the stormwater and wastewater from the Project site separately; • All the wastewater generated from the process components within the Project site will be collected in accordance with the provisions of the “Drainage and Wastewater Gathering Philosophy” and “Specification for Drainage” and will be treated in WWTP to be established in the Project site. Accordingly; <ul style="list-style-type: none"> ○ All wastewater drainage systems shall be routed to appropriate 	Project Company O&M Company	Throughout operation.	<ul style="list-style-type: none"> • Project wastewater and drainage management plans including “Drainage and Wastewater Gathering Philosophy” and “Specification for Drainage;” • Operation Phase Environmental and Social Management Plan; • Operation Surface Water and Wastewater Management Plan; 	<ul style="list-style-type: none"> • Operation Surface Water and Wastewater Management Plan is prepared and implemented; • Wastewater drainage system including separate non-oily sewer system (NOS), possibly oily contaminated sewer (POCS), oily water sewer (OWS) and sanitary sewer system (SS) are constructed in accordance to the design standards. • Wastewater treatment plant project approval and discharge permit are in place; • Register for wastewater discharges (i.e. discharge amount, and discharge quality analysis in accordance to the project standards as well as national legislative requirements; • Ambient quality analysis at discharge location.

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			effluent treatment facilities, except NOS; <ul style="list-style-type: none"> ○ Streams with temperature above 42°C, pH outside the range of 6-9, volatile streams (any stream containing C4 and lighter compounds), and pure hydrocarbon streams shall not be released to any environment or wastewater drainage and collection systems; ○ Streams to be sent to OWS shall not contain dissolved hydrocarbon gases; ○ The seal water from flare stack shall be sent to OWS; ○ Blowdowns from steam drum/boilers containing phosphate and nitrogen compounds shall be diverted to OWS system and shall be flashed to recover steam and cooled down to 42°C; ○ Possibly oily condensate to be collected within the process units shall be sent to condensate polisher. Depending on the total organic compound or oil concentration (above 10 ppm), contaminated stream; condensate shall be diverted to OWS; ○ Cooling water blowdown will be routed to outfall while backwash water for CW side-stream filter to WWT; ○ Caustic and spent caustic (non-oily) streams resulting from the process units shall be collected via caustic sewer system. Non-neutralized streams (i.e., spent caustic) shall be treated separately within the unit; ○ Considering the miscellaneous drainage inside the Project site including chemical drains, and drains from laboratories, and mechanical rooms, etc. such fluids 				<ul style="list-style-type: none"> • Audit and inspection reports.

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<p>shall not be permitted in NOS, POCS, OWS or SS drains and shall be handled separately;</p> <ul style="list-style-type: none"> ○ Rainwater to be collected in tank bund areas shall be connected to a valve pit outside the bund to prevent spill or leaks from entering the drains prior to water quality check. In the absence of oil, the tank bund content shall be diverted to the non-oily sewer (NOS) otherwise to the Possibly Oily Contaminated Sewer (POCS). If there is a small quantity of spill/leakage to be occurred, the tank bund shall be diluted with flushing water and shall be diverted to POCS; ○ The products purged from the lines and the pieces of the equipment within the process will be collected in CDS and the products will be stored in dedicated process drums, to be reprocessed in the plant. ● Necessary measures will be taken for liquid wastes from laboratories; ● The wastewater management practices given in the IFC EHS Guideline for Petroleum-based Polymers Manufacturing (2007) and EBRD Sub-sector E&S Guidelines for Manufacture of Plastics and Synthetics (2014)) will be followed: <ul style="list-style-type: none"> ○ Ensure that untreated wastewater does not discharge to receiving environment; ○ Segregate wastewater (neutralise caustic effluents, collect oily effluents etc.), effluent streams and rainwater to reduce the need for wastewater treatment; ○ Minimise the consumption of water used in production process and equipment cleaning and recycle wastewater where possible; 				

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<ul style="list-style-type: none"> ○ Depending on technical and economic feasibility, install roofs if there is a risk that rainwater may fall on contaminated areas. If the installation of a roof is not possible or not feasible, potential contaminated rainwater from concerned area should be captured and treated before discharged to a receiving environment; ○ Remove VOCs from wastewater through flash distillation or any other equivalent systems prior to treatment in WWTP; ○ Organics shall be separated and recycled to the process where possible; ○ Super reactant solutions shall be sent to specialized treatment for disposal; ○ Acidic and caustic effluents from demineralized water preparation shall be neutralized prior to wastewater treatment; ○ Oily effluents shall be collected in closed drainage channels/pipes and discharged to the WWTP in the facility; ○ Sufficient process fluid let-down capacity shall be provided to avoid process liquid discharge into the oily drain system. ● A separate drainage system will be provided within the Facility for spent caustic. There will also be closed drain systems (CDS) on-site, where wastewater from process lines is collected in dedicated process drums to be re-processed in the Plant. All wastewater to be collected from the drainage systems except the non-oily sewer system (uncontaminated stormwater) will be sent to the treatment units/plants in the Facility. 				

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
O.14	Wastewater (Marine)	IFC PS3, EBRD PR3, National legislation	<ul style="list-style-type: none"> Domestic and industrial wastewater to be generated during the operation phase of the Associated Terminal Facility will be collected separately depending on the characteristics of wastewater in accordance with the provisions of the "Drainage and Wastewater Gathering Philosophy" and "Specification for Drainage" and will be treated in the WWTP to be established in the Project site or to be collected in septic tanks and sent to a licenced treatment company; A stormwater and wastewater drainage and collection system will be established on site to collect and manage uncontaminated and contaminated drainages separately; For the collection of site drainage non-oily sewer system (NOS), possibly oily contaminated sewer (POCS), oily water sewer (OWS) and sanitary sewer system (SS) will be established to collect and treat the stormwater and wastewater from the Project site separately; In the scope of the Project, dumping of any liquid and solid material to the sea will not be allowed. Measures will be taken in order to prevent any waste falling into sea and any spills or leaking of oil and petroleum products. 	SPV of Terminal Facility	Throughout operation.	<ul style="list-style-type: none"> Project wastewater and drainage management plans including "Drainage and Wastewater Gathering Philosophy" and "Specification for Drainage;" Operation Phase Environmental and Social Management Plan; Operation Surface Water and Wastewater Management Plan; 	<ul style="list-style-type: none"> Operation Surface Water and Wastewater Management Plan is prepared and implemented; Project approvals are in place for septic tanks; Register for wastewater discharges; Wastewater discharge transfer records and permit is in place;; Wastewater drainage system including separate non-oily sewer system (NOS), possibly oily contaminated sewer (POCS), oily water sewer (OWS) and sanitary sewer system (SS) are constructed in accordance to the design standards. Incident records; Audit and inspection reports.
AIR QUALITY							
O.15	Air Emissions	IFC PS3, EBRD PR3, Best Practice, National legislation	<ul style="list-style-type: none"> Operation Air Quality Control and Monitoring Plan (OAQCMP) to be developed will include mitigation measures that will be taken to minimise emissions during operation; OAQCMP will cover measurements of air pollutants at nearby sensitive locations as necessary; OAQCMP will include details of sampling locations, monitoring frequency, methods 	Project Company O&M Company SPV of Terminal Facility	Throughout operation.	<ul style="list-style-type: none"> Operation Air Quality Control and Monitoring Plan; Operation Phase Traffic Management Plan. 	<ul style="list-style-type: none"> Operation Air Quality Control and Monitoring Plan is prepared and implemented. Evidence for implementation of BAT – BREFF requirements implemented.

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<p>of sampling for each parameter, applicable regulatory limits and will require analysis of samples by accredited laboratories;</p> <ul style="list-style-type: none"> • OAQCMP will set forth the details of the monitoring regarding the potential emission sources on site and potential receptors off-site, separately. The monitoring will include weekly inspection of the potential sources (connection equipment such as valves, pumps, connectors, etc., and storage tanks) of leaks and emissions of VOC by the use of portable monitoring devices and periodic monitoring of stack emissions for NO₂ during operation; • The OAQCMP will also identify the relevant responsibilities within the scope of the inspection, monitoring, record keeping and reporting procedures as well as the details of record keeping and reporting for the monitoring results and exceptional and accidental releases. Hence, continuous record keeping, and periodic evaluation of the monitoring results will ensure the detection of any changes in emissions or ambient air quality values that may be affected by the Project operation or by cumulative impacts from outside sources and enables pre-emptive measures to be taken preventing any potential impacts; • Direct and indirect greenhouse gas emissions will be quantified annually during operation and Project Company carry out a Climate Change Alternatives Analysis and cover Transition Risks; • OTMP will be prepared and implemented which will decrease the impacts of the traffic load from operational activities. This, in turn, will lower the exhaust emissions from the vehicle movements; • In order to minimise exhaust emissions the following measures will also be taken: 				<ul style="list-style-type: none"> • Records of air quality / stack gas emissions monitoring; • GHG Emission estimation report is in place; • Air Emission Permit is in place; • Traffic Management Plan is prepared and implemented; • Audit and inspection reports. • Records of Equipment monitoring and maintenance (M&M) and/or leak detection and repair (LDAR);

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<ul style="list-style-type: none"> ○ All trucks and vehicles used for transportation during operation phase will be maintained regularly to keep them in good working condition to minimize exhaust emissions caused by poor performance; ○ Low sulphur contained fuel will be used; ○ Engines of the equipment/trucks will be prevented from idling; ○ Unnecessary Project traffic will be avoided inside and outside of the Project site by adequate planning of material transport. ● Project Company will make sure selection of adequate emission reduction technologies during the design phase of the Project; Mitigation measures given below are applied to all types of polymer production as best practices. In this respect, Project Company will evaluate these measures during detailed design and implement them based on technical and economic feasibility. After the completion of the detailed design, a report will be submitted to the lender before the start of the construction on how and in which parts the measures mentioned below are applied. <ul style="list-style-type: none"> ○ Advanced equipment design to reduce fugitive emissions: <ul style="list-style-type: none"> ➢ use of valves with bellow or double packing seals; ➢ magnetically driven or canned pumps, or pumps with double seals and a liquid barrier; ➢ magnetically driven or canned compressors, or compressors using double seals and a liquid barrier; ➢ magnetically driven or canned agitators, or agitators with 				

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<ul style="list-style-type: none"> double seals and a liquid barrier; ➤ minimization of the number of flanges (connectors); ➤ effective gaskets; ➤ closed sampling systems; ➤ drainage of contaminated effluents in closed systems; ➤ collection of vents. ○ Fugitive loss assessment and measurement study to identify process elements with the highest potential for fugitive loss; ○ Equipment monitoring and maintenance (M&M) and/or leak detection and repair (LDAR) (e.g., a portable monitoring device) programme* based on a component and service database in combination with the fugitive loss assessment and measurement; ○ Dust emission reduction techniques: <ul style="list-style-type: none"> ➤ dense phase conveying is more efficient to prevent dust emissions than dilute phase conveying; ➤ reduction of velocities in dilute phase conveying systems to values as low as possible; ➤ reduction of dust generation in conveying lines through surface treatment and proper alignment of pipes; 				

* Mentioned program should also be implemented during the commissioning phase of the Project. The last record kept in this phase will be used as a reference for the operation phase of the Project.

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<ul style="list-style-type: none"> ➤ use of cyclones and/or filters in the air exhausts of dedusting units. The use of fabric filter systems is more effective, especially for fine dust; ➤ use of wet scrubbers. ○ Minimisation of plant start-ups and stops to avoid peak emissions and reduce overall consumption (e.g., energy, monomers per tonne of product); ○ to treat the air purge flows coming from degassing silos and reactor vents with one or more of the following techniques: <ul style="list-style-type: none"> ➤ recycling; ➤ thermal oxidation; ➤ catalytic oxidation; ➤ adsorption; ➤ flaring (Flaring systems are to treat discontinuous emissions from the reactor system. Flaring of discontinuous emissions from reactors is only BAT if these emissions cannot be recycled back into the process or used as fuel). 				

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
NOISE							
O.16	Noise		<ul style="list-style-type: none"> • 'Low-noise' equipment will be used during operation phase as far as possible. Depending on technical suitability, noise generating equipment will be kept in confined spaces to the extent possible; • Equivalent sound pressure level for 8 hours, superimposed on the existing background noise level, in the work area within the new facilities will not exceed 85 dB(A) at any point 1 meter away from any equipment surface. Sound pressure level in restricted areas, those work areas in the plant where it is not reasonably practicable to reduce the noise level below the work area limit, may be between 85 and 115 dB(A). In all cases, the absolute limit of 115 dB(A) remains valid in such areas. If it is unavoidable that the work area limit will be exceeded around particular equipment, action will be taken to reduce the area involved as much as feasible; this may include the installation of an acoustical enclosure. • For Receptor Point 2 (R2 as defined in the ESIA Ch10), major contributor to the total operation noise is from the Associated Facility (i.e., machinery and equipment on the Jetty site of the Terminal Facility). In order to overcome noise impact at this receptor 5 dB of noise insulation measures are expected to be used at source (at machine and equipment itself) by the relevant operator company. • For R4 (as defined in Ch 10 of ESIA), major contributors to the total operation noise are numerous machines and equipment (for instance; heaters, compressors, pumps etc.) thus, it is not applicable to reduce the noise at source. In order to overcome noise impact at this receptor 5 dB of noise 	Project Company O&M Company SPV of Terminal Facility	Throughout operation.	<ul style="list-style-type: none"> • Operation Phase Environmental and Social Management; • Operation Noise Control and Monitoring Plan; • Operation Traffic Management Plan 	<ul style="list-style-type: none"> • Operation Noise Control and Monitoring Plan is prepared and implemented; • Periodic (at least monthly) noise monitoring are performed at nearest receptors defined in ESIA; • Training record; • Incident records; • Monitoring records; • Grievance records on noise and vibration; • Audit and inspection reports.

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<p>mitigation measures including noise mitigation structures such as noise berms or noise barriers will be used. Final decisions and detailed design of relevant mitigation measures shall be detailed in Noise Management Plan.</p> <ul style="list-style-type: none"> Receptors R2, R4 and R5 (as defined in Ch 10 of ESIA) shall be periodically monitored through a noise monitoring campaign for the first three years of the operation. Noise measurements will be performed for 24 hours during weekdays and weekends in order to sustain national and international requirements. An efficient grievance mechanism to receive complaints and act in the shortest possible time will be established to follow best management practices. 				
TRAFFIC							
O.17	Terrestrial Traffic	IFC PS4, EBRD PR4	<ul style="list-style-type: none"> A Project specific Operation Traffic Management Plan (OTMP) will be prepared and implemented; Mitigation measures as part of the Operation Traffic Management Plan will be developed in consultation with affected communities, vulnerable people or groups in communities and stakeholders, including Incirli community. The appropriate consultation measures will be provided in the Plan; Necessary consultation with the relevant authorities will be conducted related to the implementation of the Operation Traffic Management Plan; An efficient grievance mechanism will be implemented to collect complaints from local residents and other stakeholder on the potential traffic issues. 	Project Company O&M PDH-PP Company	Throughout operation.	<ul style="list-style-type: none"> Operation Environmental and Social Management Plan Operation Traffic Management Plan / Traffic Management Procedure 	<ul style="list-style-type: none"> Operation TMP is prepared and implemented; Evidence that Operation TMP requirements are cascaded down to EPC Contractor and subcontractors; Evidence of regular monitoring of implementation of the Operation TMP; Evidence of consultations with affected communities and authorities; Evidence of informing affected communities on grievance mechanism.
O.18	Marine Traffic	IFC PS4,	No marine traffic related to the Project operation activities is expected. However, the	Project Company	Throughout operation.	<ul style="list-style-type: none"> Operation Marine Traffic 	<ul style="list-style-type: none"> Marine TMP is developed;

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
		EBRD PR4	<p>operation of the Jetty as part of Terminal Facility (associated facility) will be used for propane supply. The following measures should be implemented:</p> <ul style="list-style-type: none"> • Marine Traffic Management Plan (TMP) should be developed by the SPV responsible for operation of associated facilities. The Company will recommend the SPV development of this plan and will make reasonable effort to ensure this measure is implemented; • Up-to-date information on activities at the sea will be conveyed to fishermen in Incirli and Gölovası; • An Operation Emergency Preparedness and Response Plan, which covers the Marine Part of the Project, shall be prepared before the operation stage, in accordance with the "Act on Guidelines for Response to Emergencies and Compensation of Losses in Case of Pollution of the Marine Environment from Oil and Other Harmful Substances" and its provisions; • Mitigation measures regarding health and safety of fishermen should be implemented (see 'Community Health and Safety' below); • A grievance mechanism that allows stakeholders (including fishermen) to communicate concerns and have them addressed in a timely and effective manner shall be established and implemented. • Meteorological conditions at the Terminal Facility should be continuously monitored, it will be appropriate to postpone the docking manoeuvres in cases where the Hs value of wave height exceeds 1.5 meters when the southern seas rise; • In terms of manoeuvring safety at the tanker terminals, it will be appropriate to define a reference line so that the ships that will 	<p>SPV of Terminal Facility</p> <p>O&M Terminal Facility Company</p>		<p>Management Plan;</p>	<ul style="list-style-type: none"> • Evidence of interaction with fishermen is in place; • Operation Emergency Preparedness and Response Plan covering marine part is in place; • Evidence of implementing measures regarding health and safety of fishermen is in place; • Evidence that grievance mechanism is established to receive comments/grievances of stakeholders (including fishermen). Evidence of informing fishermen on grievance mechanism; • Records of meteorological parameters; • Marine traffic records; • Incident records; • Training records; • Ensure that grievance mechanism is established and in place to receive comments/grievances of communities

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			berth to Jetty #1 do not fall close to the shore while turning; <ul style="list-style-type: none"> It should be ensured by the SPV of the Terminal Facility that the ship propulsion power in port access areas shall be considered during the design stage to provide safe navigation of vessels; It will be considered to offer marine safety training to main vessel companies and applying an incentive scheme for companies that can demonstrate good maintenance of their vessels and low accident statistics; Avoid unnecessary vessel movements, as possible; Licensed vessels delivering products will comply with the Marpol Convention. The navigation routes of licensed vessels delivering products will be clearly determined and shared with other users. 				
ECOLOGY							
O.19	Terrestrial Section: Flora	IFC PS6, EBRD PR6	<ul style="list-style-type: none"> Limiting Project activities to designated sites to minimise impacts on the habitat. Informing and training Project personnel regarding the necessary mitigation measures. Preventing introduction of alien species on purpose or by accident. As a best management practice, where possible, in order to prevent/minimise loss of natural habitats in the region and to compensate for residual impacts Offset Strategy is recommended to be developed to assess the biodiversity offset options available in collaboration with the Project, specialists, expert stakeholders, and relevant government organizations. Of specific to the species during operation phase, the following mitigation measures shall be followed:	Project Company O&M Company	Throughout operation.	<ul style="list-style-type: none"> Operation Phase Environmental and Social Management Plan; Biodiversity Management Plan Terrestrial Biodiversity Action Plan. 	<ul style="list-style-type: none"> Biodiversity Management Plan is prepared and implemented. Terrestrial Biodiversity Action Plan is prepared and implemented. Evidences regarding implementation of the Biodiversity Management Plan and Terrestrial Biodiversity Action Plan; Training records of the operational personnel on the mitigation measures regarding protection of the flora species;

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<ul style="list-style-type: none"> In order to monitor success of the newly established <i>Cyclamen persicum</i> populations, monitoring studies should be conducted during the flowering season of the species in February-March. During the reinstatement of the areas that will be impacted from the Project activities, it is important to use native plant species in plantations along the roads to prevent erosion and also ensure habitat integrity. Some of the tree species that can be used in landscaping include; <i>Pinus brutia</i> and <i>Pinus pinea</i>. A natural shrub species of the region; <i>Zizyphus lotus</i> can also be used in landscaping. 				<ul style="list-style-type: none"> Reinstatement and landscape arrangements after completion of construction activities; Evidence of monitoring on the tubers of the <i>Cyclamen persicum</i> (and <i>Pancreatium maritimum</i> if found during survey) translocated during construction works. Audit and inspection reports.
O.20	Terrestrial Section: Fauna	IFC PS6 EBRD PR6	<ul style="list-style-type: none"> Water sources should be provided (i.e., small pond) at the Project site to support the birds, where possible. Some food bushes and trees in natural species such as <i>Pyracantha coccinea</i>, <i>Morus sp.</i>, some nuts, blackberry etc. shall be planted at the Project site to support birds in the area. If possible, natural bushes and trees in the area should be protected. Tall structures (i.e., towers and chimneys) shall be painted in bright colours and the painting shall be well-maintained so that they are visible to birds. Some of the bird species prefer to nest under roofs of buildings. Therefore, roof type and holes under roofs are important; and bird-friendly construction should be preferred specifically for birds and bats (flying mammals). All staff will be appropriately trained to implement mitigation measures to protect flora and fauna at the site. 	Project Company O&M Company	Throughout operation.	<ul style="list-style-type: none"> Operation Phase Environmental and Social Management Plan; Biodiversity Management Plan Terrestrial Biodiversity Action Plan 	<ul style="list-style-type: none"> Biodiversity Management Plan is prepared and implemented. Terrestrial Biodiversity Action Plan is prepared and implemented. Evidences regarding implementation of the Biodiversity Management Plan and Terrestrial Biodiversity Action Plan; Training records of the operational personnel on the mitigation measures regarding protection of the fauna species; Register regarding transfer of fauna species to the habitats defined in the BMP and Terrestrial BAP; Placement of the necessary wildlife

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
							warning and information signs, where needed. <ul style="list-style-type: none"> Audit and inspection reports.
O.21	Marine Section: Flora and Fauna	IFC PS6 EBRD PR6 National legislation	<ul style="list-style-type: none"> The environmental conditions and variations shall be monitored by a specifically structured team of experts; this team shall prepare environmental policies and procedures in line with relevant legislation and standards. Chemicals such as paints and solvents, that may pose threat for marine ecosystem should be collected separately and disposed of by licensed companies. Solid wastes shall never be dumped into the sea; these wastes should be collected in a designated area and disposed of by licensed companies or municipalities. It should be strictly prohibited to discharge bilge water in the port area or in the close surroundings; it should be collected separately; Generated wastewater shall never be discharged into the sea without prior treatment. Contaminants to be generated during maintenance activities shall not enter the port area in order to prohibit potential contamination of the marine environment. <p>Marine turtles:</p> <ul style="list-style-type: none"> The marine vehicles should be used with very low speeds within 1 mile of the shore; In case of an accident involving marine turtles at the sea, the initial response should be given by the expert; Monitoring studies shall be conducted at Incirli beach not only during nesting season (May-October) but also regularly such as 3 times a month by the expert. <p>Mediterranean Monk Seal</p> <ul style="list-style-type: none"> Project activities are expected to have impacts of moderate significance for the 	SPV of Terminal Facility	Throughout operation.	<ul style="list-style-type: none"> Operation Phase Environmental and Social Management Plan Biodiversity Management Plan Waste Management Plan Surface Water and Wastewater Management Plan 	<ul style="list-style-type: none"> Biodiversity Management Plan is prepared and implemented; Marine Biodiversity Action Plan is prepared and implemented; Evidences regarding implementation of the Biodiversity Management Plan and Marine Biodiversity Action Plan; Records regarding Monitoring of benthic organisms twice a year during spring and autumn seasons; Monitoring records regarding Sea Turtle activity at Incirli beach; Audit and inspection reports.

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			Mediterranean Monk Seal (<i>Monachus monachus</i>) owing to the measures that shall be taken related to the marine ecosystem. In case further need is identified, seasonal monitoring studies might be considered particularly to determine feeding potential of the Project site.				
CULTURAL HERITAGE							
O.22	Terrestrial Section: Chance find during operation and protection of cultural assets	IFC PS8, EBRD PR8, National legislation	<ul style="list-style-type: none"> A Cultural Heritage Management Plan (CHMP) and Chance Find Procedure is prepared for construction will also be implemented for operation phase. CHMP and Chance Find Procedure that will be developed for the Project will be shared with the O&M Company. The Project Company will ensure that O&M Company will apply the abovementioned plan/procedure. The CHMP and Chance Find Procedure will apply to both terrestrial activities and marine activities (for associated facilities). The CHMP will cover measures related to protection of the ancient waterway; The provisions of the Chance Find Procedure will include notification of relevant competent bodies of found objects or sites; delivering training to the project personnel, including contractor and sub-contractor employees, on the procedures to follow in case chance finds are discovered; and securing the area of finds to avoid any further disturbance or destruction. 	Project Company O&M PDH-PP Company SPV of Terminal Facility O&M Terminal Facility Company	Throughout operation.	<ul style="list-style-type: none"> Cultural Heritage Management Plan; 	<ul style="list-style-type: none"> CHMP and Chance Find Procedure are prepared and implemented; CHMP and Chance Find Procedure are cascaded down to O&M Company; Measures to avoid/mitigate impacts on the ancient waterway are implemented; Evidence that O&M Company also apply the provisions of the abovementioned plan and procedure; Evidence that measures to mitigate vibration related to the Project activities is in place.
SOCIOECONOMICS							

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
O.23	Economy and employment	IFC PS2, EBRD PR2	<ul style="list-style-type: none"> Implement HR Policy; Update and implement Personnel Selection and Employment Procedure; Update and implement Procurement Procedure; The Project will seek to maximize the benefits from the Project to local communities in terms of direct and indirect employment and purchasing of local goods and services during operation. This will include measures such as adopting local employment and purchasing policies, establishing tenders for procurement of subcontracted goods and services at a scale that local businesses can respond to, ensuring opportunities are advertised locally. 	Project Company O&M PDH-PP Company SPV of Terminal Facility O&M Terminal Facility Company	Throughout operation.	<ul style="list-style-type: none"> HR Policy; Personnel Selection and Employment Procedure; Labour and Working Conditions Management Plan; Procurement Procedure Subcontractor Management and Monitoring Plan; Public and Worker Grievance Mechanism; Code of Conduct Work Permit Procedure HSE Discipline Procedure 	<ul style="list-style-type: none"> HR Policy is in place; Personnel Selection and Employment Procedure is in place; Procurement Procedure in place; HR Policy and Personnel Selection and Employment Procedure are cascaded down to the O&M Company; Evidence of implemented measures related to local employment (as per the Personnel Selection and Employment Procedure); Evidence of implemented measures related to local procurement (as per the Procurement Procedure).
O.24	Social Investment	IFC Good Practice Handbook "Strategic Community Investment"	<ul style="list-style-type: none"> Develop and implement Social Investment Plan in cooperation with affected communities. The investment activities will be developed in cooperation with affected communities and focused on the Project Social Area of Influence. 	Project Company O&M PDH-PP Company	Throughout operation.	<ul style="list-style-type: none"> Social Investment Plan 	<ul style="list-style-type: none"> Social Investment Plan is developed; Evidence of consultations with affected communities; Evidence of implemented social investment activities.
COMMUNITY HEALTH AND SAFETY							
O.25	Community health, safety and security	IFC PS4 EBRD PR4	<ul style="list-style-type: none"> Develop and implement Community Operation Health, Safety and Security (OHSS) Plan for the Project operation stage; 	Project Company O&M PDH-PP Company	Throughout operation.	<ul style="list-style-type: none"> Operation Community Health, Safety and Security Plan; 	<ul style="list-style-type: none"> OHSS Plan is in place; Code of Conduct is in place;

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<ul style="list-style-type: none"> Implement the Code of Conduct for Project workers; Coordinate with BOTAS regarding potential impacts on Incirli community and Incirli beach; Conduct information disclosure and consultation activities with communities and other stakeholders in line with the Stakeholder Engagement Plan (SEP); Develop and implement EPRP; Develop and implement Operation Traffic Management Plan; A grievance mechanism will be in place that will enable the community to raise concerns during the lifetime of the Project. Disaster Management Plan including crisis management and unplanned events will also be prepared for operation phase of the Project. 	<p>SPV of Terminal Facility</p> <p>O&M Terminal Facility Company</p>		<ul style="list-style-type: none"> Code of Conduct; Stakeholder Engagement Plan; Emergency Preparedness and Response Plan; Operation Traffic Management Plan. Operation Disaster Management Plan including crisis management and unplanned events. 	<ul style="list-style-type: none"> Other described plans are in place; Evidence that described documents are cascaded down to Project (sub)contractors and implemented; Evidence that grievance mechanism is implemented and that affected communities and other stakeholders are adequately informed on its functioning.
O.26	Lighting and visual impact	IFC PS4, EBRD PR4	<ul style="list-style-type: none"> A Lighting system that will ensure the control and safety during operation phase of the Project, for units such as buildings and jetty, will be installed. Lighting during the operation phase will be maintained at a level that is not more than necessary in order not to disturb people and other living creatures and unnecessary lighting will be avoided. The impacts due to light pollution that may be created by the lighting of the buildings and tank areas will be minimised through impact mitigation measures such as curtaining of lights by reflecting. The natural and relatively unspoiled wide-open views surrounding the site should be transformed for the entire operational lifespan of the facility via 	<p>Project Company</p> <p>O&M PDH-PP Company</p> <p>SPV of Terminal Facility</p> <p>O&M Terminal Facility Company</p>	Throughout operation	<ul style="list-style-type: none"> Operation Phase Environmental and Social Management Plan Emergency Preparedness and Response Plan; Occupational Health and Safety Management Plan. 	<ul style="list-style-type: none"> Evidence of measures implemented; Evidence that grievance mechanism is implemented and that affected communities and other stakeholders are adequately informed on its functioning. EHSS Policy is in place; Relevant personnel are hired for the implementation of the ESMS; Monitoring records during operation; Audit and inspection reports.

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			planting in areas which do not have to remain open for operational reasons, including appropriately selected vegetation; <ul style="list-style-type: none"> • Proper planning and placement of light fixtures in order to reduce visual impacts associated with glare and light trespass. 				
O.27	Air quality impacts and noise impacts on the nearby community	IFC PS4, EBRD PR4	<ul style="list-style-type: none"> • An Operation Air Quality Control and Monitoring Plan will be prepared and implemented during the operation phase of the Project. • An Operation Noise Control and Monitoring Plan will be prepared and implemented during the operation phase of the Project; • The Project Company will develop and implement a OHSS Plan, with commitments to implement the following key measures to protect the community from adverse effects during operation: noise, dust, other emissions risks with material and hazardous substances and accidents; • The Project Company will develop and implement Operation TMP (see above). 	Project Company O&M PDH-PP Company SPV of Terminal Facility O&M Terminal Facility Company	Throughout operation	<ul style="list-style-type: none"> • Operation Air Quality Control and Monitoring Plan; • Community Health, Safety and Security Plan; • Operation TMP; • Operation Noise Control and Monitoring Plan; • Emergency Preparedness and Response Plan. 	<ul style="list-style-type: none"> • Operation Air Quality Control and Monitoring Plan is in place; • Operation Noise Control and Monitoring Plan is in place; • OHSS is in place; • Operation TMP is in place; • Evidence that described documents are cascaded down to Project (sub)contractors and implemented; • Evidence that grievance mechanism is implemented and that affected communities and other stakeholders are adequately informed on its functioning.
O.28	Life and fire safety	IFC PS4, EBRD PR4, National legislation	<ul style="list-style-type: none"> • Emergency Preparedness and Response Plan will be prepared and implemented. A Life and Fire Safety Procedure will be prepared under EPRP; • Project shall adopt standards related with national fire protection association (NFPA) and instrumentation, control and safety systems (i.e., Instrumentation, Systems and Automation society (ISA), American Petroleum Institute (API) and Engineering 	Project Company O&M PDH-PP Company SPV of Terminal Facility	Throughout operation	<ul style="list-style-type: none"> • Emergency Preparedness and Response Plan; • Fire Safety Procedure; • Accommodation Camp Management Plan. 	<ul style="list-style-type: none"> • Emergency Preparedness and Response Plan is prepared and implemented. • Life and Fire Safety Procedure is prepared and implemented; • Emergency response equipment is easily

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<p>Equipment and Materials User Association (EEMUA)). The local code and standards are Turkish Standard (TS) TS4943: Safety standards in crude oil and petroleum products storage tank farms, TS 862: standard for hand fire extinguishers, TS International Organization for Standardization (ISO) 15420: Standard for gas extinguishing systems;</p> <ul style="list-style-type: none"> • Necessary precautions will be undertaken for the on-site offices and worker's accommodation areas. The Workers' Accommodation Plan will include fire and emergency response provisions; • A fire audit shall be conducted by a fire expert in the workers offices and accommodation areas and positive opinion shall be secured from the expert; • Project units and Associated Terminal Facility will be equipped with flammable gas detectors, toxic gas detectors, oxygen detectors, heat detectors, flame detectors, smoke detectors and manual alarm call point; • Fire and Gas System (FGS) will be a dedicated system for fire and gas detection and will have protection functions, which provides personnel warning and allows immediate response to minimise damage caused by any emergency situation. FGS will include fire and gas systems in main control building, satellite instrument house and marine operating building; fire and gas detection and alarm devices for plant areas; and interface to building fire alarm control panels; • A Life and Fire Safety Plan will be prepared identifying major fire risks, applicable codes, standards and regulations, and mitigation measures. An Emergency Preparedness and Response Plan will be prepared and implemented to respond timely to the incidents for 	O&M Terminal Facility Company		<ul style="list-style-type: none"> • Operation Disaster Management Plan including crisis management and unplanned events; 	accessible, in place and in working condition.

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			terrestrial and marine sections of the Project for the operation phase as part of the Environmental and Social Management System (ESMS) to be established. The plan will also be aligned with the Ceyhan Petrochemical Industrial Region's (including Port) Emergency Response Plan according to national regulations.				
O.29	Security	IFC PS4, EBRD PR4, Best practice, National legislation	<ul style="list-style-type: none"> A Security Management Plan will be developed to be implemented. Security will be provided in a manner that does not jeopardise community's safety or Project Company's relationship with the community and that is consistent with national requirements and international standards. A special Code of Conduct for the guidance and counselling of the Security Personnel will be prepared; International best practice will be applied for hiring, training and mobilising security staff. Project Company will ensure that security personnel have not been involved in past abuses and are adequately trained. Force will only be sanctioned in preventive or defensive circumstances in proportion to the threat and security will operate within the law; The grievance mechanism will allow communities and workers to express concerns regarding security issues and behaviour of security personnel. 	Project Company O&M PDH-PP Company SPV of Terminal Facility O&M Terminal Facility Company SPV of Terminal Facility	Throughout operation.	<ul style="list-style-type: none"> Security Management Plan; Code of Conduct for security personnel. 	<ul style="list-style-type: none"> Security Management Plan is in place; Code of Conduct for security personnel; Evidence that these documents are cascaded down to Project (sub)contractors and implemented; Evidence that grievance mechanism is implemented and that affected communities and other stakeholders are adequately informed on its functioning.
LABOUR AND WORKING CONDITIONS							
O.30	HR Policy	IFC PS2, EBRD PR2, Best Practice	<ul style="list-style-type: none"> Develop and implement HR Policy in line with the IFC PS 2; Implement Code of Conduct for workers; Ensure the HR Policy is cascaded down to (sub)contractors and implemented throughout the Project. 	Pro Project Company O&M PDH-PP Company	Prior to operation.	<ul style="list-style-type: none"> HR Policy; Code of Conduct. 	<ul style="list-style-type: none"> HR Policy is in place; Code of Conduct for workers is in place; Evidence that described documents are cascaded down to

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
				SPV of Terminal Facility O&M Terminal Facility Company			Project (sub)contractors and implemented.
O.31	Labour and working conditions	IFC PS2, EBRD PR2, National legislation	<ul style="list-style-type: none"> Update (as relevant) and implement: <ul style="list-style-type: none"> Personnel Selection and Employment Procedure; Worker Grievance Mechanism. 	Project Company O&M PDH-PP Company SPV of Terminal Facility O&M Terminal Facility Company	Prior to operation.	<ul style="list-style-type: none"> Personnel Selection and Employment Procedure. 	<ul style="list-style-type: none"> Evidence of implementation of the Personnel Selection and Employment Procedure; Evidence of implementation of the grievance mechanism.
O.32	Worker Grievance Mechanism	IFC PS2, EBRD PR2	<ul style="list-style-type: none"> Worker Grievance Mechanism will be developed and will: <ul style="list-style-type: none"> be open to all the staff and their contractors; be publicly advertised by the Project in the workforce; be easily accessible by workers; be free of retribution; allow anonymous complaints to be raised and addressed. Employees will be informed about this mechanism at the time of hiring and during regular training. 	Project Company O&M PDH-PP Company SPV of Terminal Facility O&M Terminal Facility Company	Throughout operation.	<ul style="list-style-type: none"> Worker Grievance Mechanism. 	<ul style="list-style-type: none"> Evidence for O&M Company adopted relevant procedures regarding Worker Grievance Mechanism; Worker Grievance Mechanism in Place; Training records on Worker Grievance Mechanism; Grievance Boxes and forms are in place; Register including Worker Grievance Records and corresponding responses as well as resolutions.
O.33	Occupational health and safety	IFC PS2 EBRD PR2 National legislation	<ul style="list-style-type: none"> Development and implementation of the Operation Occupational Health and Safety Management Plan (OOHSMP) for operation phase of the Project; 	Project Company O&M PDH-PP Company	Throughout operation.	<ul style="list-style-type: none"> Operation Occupational Health and Safety Management 	<ul style="list-style-type: none"> Operation Occupational Health and Safety Management Plan (OOHSMP) is in place;

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<ul style="list-style-type: none"> • All accidents and incidents will be recorded. The efficiency of health and safety practices will be monitored through internal and external audits and corrective actions will be taken if required; • Project Company will ensure that the employed personnel fully obey all the published process instructions/manuals related to (but not limited to) safety, provisions of contract and other relevant legislation; • Project Company will ensure that all the personnel undergo the training as stipulated by the national legislation and international standards; • Project Company will ensure that the installations, equipment, systems, buildings and utilities do not form a threat to anyone in terms of work health and safety; • Confined space entry procedure will be prepared and implemented. Entry to confined spaces will be controlled and avoided where possible; • Indoor air quality monitoring will be conducted and signage will be placed to locations where there are elevated levels of emissions and personal protective equipment (PPE) is required; • Leak Detection and Repair (LDAR) programme will be applied where necessary; • Following process management practices will be applied: <ul style="list-style-type: none"> ○ Physical hazard testing of materials and reactions; ○ Hazard analysis considering the process chemistry; ○ Necessary maintenance and mechanical integrity of the process equipment and utilities; 	<p>SPV of Terminal Facility</p> <p>O&M Terminal Facility Company</p>		<p>Plan and its procedures;</p> <ul style="list-style-type: none"> • Subcontractor Management and Monitoring Plan. 	<ul style="list-style-type: none"> • Evidence of implementation of OOHSMP; • Training records; • Incident and accident records; • Daily toolbox talks' records; • Internal and external audit reports; • Evidence for providing proper and sufficient PPEs for the workers. • Work permit procedure is in place; • Records on work permits.

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
			<ul style="list-style-type: none"> ○ Preparation of operating manuals/instructions considering the units/components of the Project; ○ Of specific to the polymerisation process, the provisions of backup emergency power, cooling and inhibitor addition systems and blowdown tanks; ● The efficiency of health and safety practices will be monitored through internal and external audits and corrective actions will be taken if required. 				
O.34	Subcontractors and suppliers	IFC PS2, EBRD PR2 and PR4	<ul style="list-style-type: none"> ● Subcontractors will be required to follow the requirements of IFC PS2 and EBRD PR4. Contracts to be signed with subcontractors will include EHS requirements. A "Subcontractor Management and Monitoring Plan" will be prepared and implemented by Project Company 	Project Company O&M PDH-PP Company SPV of Terminal Facility O&M Terminal Facility Company	Prior to and during operation phase.	<ul style="list-style-type: none"> ● HR Policy ● Subcontractor Management and Monitoring Plan; ● Procurement Procedure; ● Supply Chain Management Plan; ● Subcontractor HSE Assessment Procedure. 	<ul style="list-style-type: none"> ● HR Policy is in place; ● Evidence that described documents are cascaded down to Project (sub)contractors and implemented.
STAKEHOLDER ENGAGEMENT							
O.35	Information Disclosure/ Stakeholder Engagement/ Community Grievances	IFC PS1, EBRD PR10	<ul style="list-style-type: none"> ● Implement Stakeholder Engagement Plan (SEP) and Grievance Mechanism; ● SEP to be updated annually and if there are significant changes in the Project; ● Publicise SEP and Grievance Mechanism, including information on contact details of responsible staff to handle grievances. ● Community Liaison Officer shall be appointed to monitor surrounding communities' complaints related to the construction activities and maintain relationships with affected communities. 	Project Company O&M PDH-PP Company SPV of Terminal Facility O&M Terminal Facility Company	Prior to and during operation phase.	<ul style="list-style-type: none"> ● Stakeholder Engagement Plan. 	<ul style="list-style-type: none"> ● SEP is prepared and implemented; ● ESIA and SEP are disclosed at the Project website and available at Project Offices; ● Evidence showing that stakeholder engagement activities (i.e. meeting notes with stakeholders, announcements regarding traffic, construction schedule,

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Ref No.	Subject	Relevant requirement	Mitigation measures	Responsible party	Timing	Related Plans and Procedures	Monitoring and evaluation criteria
							employment opportunities etc.) are performed according to the SEP; • Evidence that SEP is regularly reviewed and updated; • Evidence showing that affected communities and other stakeholders are effectively informed on the grievance mechanism; • Grievance database / Register in place (including records of grievances, corresponding responses and resolution measures).

APPENDIX - Plans and Procedures Described in the ESMP

Plans and procedures, which are determined for the Project in the ESIA Chapter 17 Environmental and Social Management, are described below. It is expected that similar plans will be developed and implemented by the SPV for managing associated facilities (Terminal). If agreed between the Project Company and the Terminal SPV, the same management plans might be used by the Project Company and the Terminal SPV for the construction stages of both projects (especially since the construction works are to be conducted by the same EPC Contractor). In addition, it is anticipated that the Terminal SPV will develop Marine Traffic Management Plan for both stages of the Terminal project. More information on management of impacts of associated facilities is provided in Section 17.3.4 of the ESIA Report.

I. For All Phases of the Project (under the Responsibility of the Project Company):

- HR Policy;
 - Code of Conduct;
- EHSS Policy;
- Labour and Working Conditions Management Plan, including:
 - Personnel Selection and Employment Procedure;
 - Worker Grievance Mechanism;
- Procurement Procedure;
- Biodiversity Management Plan, including:
 - Biodiversity Action Plan – Terrestrial;
 - Biodiversity Action Plan – Marine;
- Community Health, Safety and Security Plan,
- Cultural Heritage Management Plan, including,
 - Chance Find Procedure;
- Management of Change Plan;
- Subcontractor Management and Monitoring Plan;
- Supply Chain Management Plan;
- Security Management Plan, including:
 - Purchasing and Supplier Evaluation Procedure;
- Social Investment Plan;
- Stakeholder Engagement Plan, including;
 - External Grievance Mechanism;
- Climate Change Risk Assessment (CCRA);
- Life Cycle Assessment (LCA).

II. For construction phase (Under the Responsibility of the Project Company and EPC Contractor):

- Construction Environmental and Social Management Plan;
- Hazardous Material Management Plan;

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- Soil Management Plan;
- Waste Management Plan;
- Construction Air Quality Control and Monitoring Plan;
- Construction Noise Control and Monitoring Plan;
- Construction Surface Water and Wastewater Management Plan;
- Construction Traffic Management Plan;
- Disaster Management Plan including crisis management and unplanned events;
- Construction Emergency Preparedness and Response Plan including:
 - Fire Safety Procedure,
- Biodiversity Management Plan, including;
 - Biodiversity Action Plan – Terrestrial;
 - Biodiversity Action Plan – Marine;
- Subcontractor Management and Monitoring Plan;
- Accommodation Camp Management Plan;
- Community Health, Safety and Security Plan;
- Construction Occupational Health and Safety Management Plan, including:
 - Procedure For Control of Life Critical Activities;
 - OHSE Training Procedure;
 - Work Permit Procedure;
 - OHSE Leadership and Key Performance Indicators Procedure;
 - OHSE Incentives Procedure;
 - OHSE Discipline Procedure,
 - OHSE Monitoring Verification and Evaluation Procedure;
 - Hazard and Risk Management Procedure;
 - Accident and Incident Management Procedure;
 - Construction Machine and Equipment Procedure;
 - Working At Height Procedure;
 - Scaffold Safety Procedure;
 - Personal Protective Equipment Procedure;
 - Control of Dangerous Energy Procedure;
 - Electrical Safety Procedure;
 - Excavation Works Procedure;
 - Housekeeping Procedure;
 - Working With Dangerous Chemicals Procedure;
 - Colour Coding Procedure;
 - Storage and Stacking Procedure;
 - Lifting procedure;
 - Confined space procedure;
- Blasting Management Plan;
- Management of Change Plan;
- Subcontractor Management and Monitoring Plan, including:

- Subcontractor HSE Assessment Procedure.
- Supply Chain Management Plan, including:
 - Purchasing and Supplier Evaluation Procedure

III. For operation phase of the Project (Under the Responsibility of the Project Company and O&M Company):

- Operation Environmental and Social Management Plan;
- Operation Hazardous Material Management Plan;
- Operation Soil Management Plan;
- Operation Waste Management Plan;
- Operation Air Quality Control and Monitoring Plan;
- Operation Noise Control and Monitoring Plan;
- Operation Surface Water and Wastewater Management Plan;
- Operation Traffic Management Plan;
- Operation Disaster Management Plan including crisis management and unplanned events;
- Operation Emergency Preparedness and Response Plan, including:
 - Life and Fire Safety Plan;
- Biodiversity Management Plan, including:
 - Biodiversity Action Plan – Terrestrial;
 - Biodiversity Action Plan – Marine (under responsibility of the SPV of Terminal Facility);
- Community Health, Safety and Security Plan;
- Occupational Health and Safety Management Plan including:
 - Procedure For Control of Life Critical Activities;
 - OHSE Training Procedure;
 - Work Permit Procedure;
 - OHSE Leadership and Key Performance Indicators Procedure;
 - OHSE Incentives Procedure;
 - OHSE Discipline Procedure;
 - OHSE Monitoring Verification and Evaluation Procedure;
 - Hazard and Risk Management Procedure;
 - Accident and Incident Management Procedure;
 - Working At Height Procedure;
 - Scaffold Safety Procedure;
 - Personal Protective Equipment Procedure;
 - Control of Dangerous Energy Procedure;
 - Electrical Safety Procedure;
 - Housekeeping Procedure;
 - Working With Dangerous Chemicals Procedure;
 - Colour Coding Procedure;
 - Storage and Stacking Procedure;

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- Lifting procedure;
- Confined space procedure;
- Subcontractor Management and Monitoring Plan;
 - Subcontractor HSE Assessment Procedure.
- Supply Chain Management Plan, including:
 - Purchasing and Supplier Evaluation Procedure.