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TÜRKİYE'NİN YAPICI GÜCÜ

EARTHQUAKE RECONSTRUCTION FRAMEWORK LOAN



ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

Reyhanlı and Kumlu Drinking Water Construction Project of Hatay Metropolitan Municipality General Directorate of Water and Sewerage Administration (HATSU)

October, 2026

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HATSU
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ABBREVIATIONS

C-ESMP	Contractor's Environmental and Social Management Plan
CHS	Community Health and Safety
CoC	Code of Conduct
DLP	Defect Liability Period
E&S	Environmental and Social
EHS	Environmental, Health and Safety
EHSGs	Environmental, Health and Safety Guidelines
EIA	Environmental Impact Assessment
EIB	European Investment Bank
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
GIIP	Good International Industry Practice
GM	Grievance Mechanism
HATSU	Hatay Water and Sewerage Administration
İLBANK	İller Bankası A.Ş.
ILO	International Labour Organization
OHS	Occupational Health and Safety
PIU	Project Implementation Unit
PMC	Project Management Consultant
PM10	Particulate Matter with an Aerodynamic Diameter of 10 µm or Less
PPE	Personal Protective Equipment
RCA	Root Cause Analysis
RF	Resettlement Framework
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
WWTP	Wastewater Treatment Plant

Contractor	A person or organization providing services to an employer at the client worksite in accordance with agreed specifications, terms and conditions.
Excavated material	Soil, rock and other materials generated during excavation and related construction activities
Legally protected area	Designated terrestrial, aquatic or marine ecosystems managed under the related legislation to protect and sustain the biodiversity features, natural and associated cultural resources. Legally protected areas of Türkiye include a diversity of natural ecosystems and associated features ranging from coastal zones to mountains, deltas, forests, plains, steppe, lakes, river systems, deep valleys, canyons, and glaciers.
Material borrow site	Sites, where loose material containing gravel, sand, silt, and clay, which is formed by the natural and geological processes of rock fracturing, fragmentation, alteration, transportation, and/or in-situ sedimentation, and which has the characteristics of slope debris, are extracted to be used as fill material.
Off-site accommodation	Accommodation of workers at hotels, rented housing, etc. available in the vicinity of Subproject area.
On-site accommodation	Accommodation of workers at temporary exploration camps, construction camps, dormitories, etc. established for the Subproject on site.
Risk	A combination of the likelihood of an occurrence of a hazardous event and the severity of injury or damage to the health of people caused by this event.
Topsoil	Part of soil that provides organic and inorganic materials, air and water required for vegetative growth, and is required to be stored separate from the subsoil.

EXECUTIVE SUMMARY

This Environmental and Social Management Plan (ESMP) has been prepared by the Hatay Water and Sewerage Administration General Directorate (HATSU) for the Reyhanlı and Kumlu Drinking Water Construction Project in Hatay Province. HATSU is the Final Beneficiary under the European Investment Bank's Earthquake Reconstruction Framework Loan, with İLBANK acting as the Project Promoter. The Subproject aims to complete and renew the drinking water distribution networks, improve supply reliability and reduce water losses following the February 2023 earthquakes.

The Subproject includes approximately 117.4 km of HDPE pipelines and 6,000 household connections in Reyhanlı, and 24.6 km of HDPE pipelines and 500 household connections in Kumlu. Both components include valves, fire hydrants and other auxiliary network structures. The Reyhanlı component also includes electrical and automation works for reservoirs, pumping stations and network chambers. Previously completed reservoirs and supply and transmission facilities are not included as new construction. Construction is expected to take approximately 24 months, subject to the confirmed contract schedule. HATSU will operate and maintain the completed infrastructure.

The Subproject's national EIA screening status will be confirmed through project-specific documentation issued by the competent authority. An opinion from the relevant Directorate of Nature Conservation and National Parks will also be obtained. Applicable permitting requirements and any conditions specified by the authorities will be observed.

The main construction risks concern excavation and trench stability, confined-space entry, lifting and work at height, electrical works, machinery, traffic, dust, noise, waste, soil and water pollution, and temporary water supply interruptions. The PID identifies asbestos-cement pipes in the older networks of both settlements; appropriate controls will apply where works may disturb these pipes or other asbestos-containing materials. Community access, labour conditions, vulnerable groups and cultural heritage also require attention. The Chance Finds Procedure based on ESMF Annex 3 will apply during excavation. Operational risks concern drinking water contamination, leakage, service interruptions, maintenance safety and waste management. The ESMP matrix establishes mitigation measures, monitoring requirements and responsibilities for these risks.

İLBANK PIU will oversee ESMP implementation, supported by the Project Management Consultant (PMC). The Supervision Consultant will monitor construction compliance, and the Contractor will prepare and implement the C-ESMP and supporting plans. HATSU will coordinate local activities and implement operational measures. Training, stakeholder engagement and accessible community and workers' grievance mechanisms will support implementation.

Quarterly E&S monitoring reports will be submitted by the Contractor through the Supervision Consultant and PMC to İLBANK PIU. Monthly OHS forms will be reviewed by the Supervision Consultant, and İLBANK PIU will report to the EIB every six months. Significant incidents will be notified to İLBANK PIU within 24 hours, followed by a detailed investigation report, including root cause analysis and corrective actions, within 15 days.

1. INTRODUCTION

1.1. Background

The **Earthquake Reconstruction Framework Loan** (hereinafter referred to as the "**Project**"), financed by the **European Investment Bank (EIB)**, supports the reconstruction and improvement of municipal infrastructure in provinces affected by the earthquakes of 6 February 2023 in Türkiye. The Project aims to restore essential municipal services and improve the resilience of infrastructure serving earthquake-affected communities.

The Project covers the rehabilitation, construction and extension of drinking water, sewerage and stormwater networks; drinking water and wastewater treatment plants; and the purchase and installation of water utilities' smart systems, machinery and equipment. It also includes technical assistance for project preparation, feasibility studies, design and supervision of works.

The Republic of Türkiye, acting through the Ministry of Treasury and Finance, is the Borrower under the EUR 400 million EIB Finance Contract. **İller Bankası A.Ş. (İLBANK)** acts as the Project Promoter and coordinates Project implementation. Under the financing arrangements, loan proceeds are made available to İLBANK as grants and subsequently transferred as grants to eligible municipalities and water and sewerage administrations, designated as Final Beneficiaries, through protocols signed with İLBANK.

The Hatay Water and Sewerage Administration General Directorate (HATSU) is the Final Beneficiary of the Reyhanlı and Kumlu Drinking Water Construction Project (hereinafter referred to as the "Subproject"), located in Reyhanlı and Kumlu district centres, Hatay Province. The Subproject covers the remaining and additional drinking water distribution network works and related infrastructure required to improve supply reliability and reduce water losses following the February 2023 earthquakes. This ESMP jointly covers both locations.

Environmental and social risks and impacts under the Project are managed in accordance with the Project-specific **Environmental and Social Management Framework (ESMF)**, **Stakeholder Engagement Plan (SEP)** and **Resettlement Framework (RF)**. These documents establish the principles, procedures and responsibilities for screening, assessment, stakeholder engagement, mitigation, monitoring and reporting, consistent with applicable national legislation, relevant EU requirements and the **EIB Environmental and Social Standards (2022)**.

This **Environmental and Social Management Plan (ESMP)** has been prepared by **HATSU** for the Subproject in accordance with the Project ESMF and the applicable environmental and social requirements described in Section 1.3. It identifies the potential environmental and social risks and impacts associated with the Subproject and specifies mitigation measures, monitoring requirements and implementation responsibilities for its construction and operation phases.

Stakeholder engagement and information disclosure will be undertaken throughout Subproject implementation, including consultation with affected communities and vulnerable or disadvantaged groups. Community and workers' grievance mechanisms will be maintained, together with confidential arrangements for handling sexual exploitation and abuse and sexual harassment (SEA/SH) complaints.

Relevant ESMP requirements will be incorporated into the bidding documents and construction contract. The Contractor will prepare and implement a **Contractor's Environmental and Social Management Plan (C-ESMP)** and associated management plans consistent with this ESMP before commencing construction activities.

1.2. Objective of the ESMP

This ESMP sets out the measures required during the construction and operation of the Subproject to avoid, minimise and mitigate adverse environmental and social risks and impacts and, where necessary, compensate for residual impacts. It also defines the implementation responsibilities, monitoring arrangements and reporting requirements needed to ensure that these measures are effectively implemented in accordance with the Project ESMF, applicable national legislation and the EIB Environmental and Social Standards.

1.3. Overview of E&S Requirements Applicable to the Subproject

The Subproject will be implemented in compliance with applicable national legislation and international agreements and conventions to which Türkiye is a party, together with the environmental and social requirements established under the EIB Finance Contract and the Project ESMF.

The applicable requirements include:

- **EIB Environmental and Social Standards (2022);**
- **Project Environmental and Social Management Framework (ESMF), Stakeholder Engagement Plan (SEP) and Resettlement Framework (RF);**
- **EU Environmental Impact Assessment Directive (2011/92/EU), as amended by Directive 2014/52/EU;**
- **EU Habitats Directive (92/43/EEC) and Birds Directive (2009/147/EC),** concerning the protection of habitats, biodiversity and species;
- **EU Water Framework Directive (2000/60/EC),** concerning the protection of surface water and groundwater;
- **EU Waste Framework Directive (2008/98/EC), as amended,** concerning waste prevention, management and the waste hierarchy;
- World Bank Group General EHS Guidelines (2007);
- World Bank Group EHS Guidelines for Water and Sanitation (2007).

The relevant provisions of these directives will be considered in the assessment, design, construction and operation of the Subproject, in accordance with its scope, potential impacts and the applicable EIB requirements.

Table 1 Relevance of the EIB Environmental and Social Standards to the Subproject

EIB Standard	Relevance to the Subproject
Standard 1 – Environmental and Social Impacts and Risks	**Relevant.** Construction and operation of the drinking water network and related infrastructure involve environmental and social risks requiring assessment, mitigation, monitoring and reporting. This ESMP addresses these requirements.
Standard 2 – Stakeholder Engagement	**Relevant.** Residents, businesses, public institutions and other stakeholders may be affected by construction activities and service disruptions. The Subproject-specific SEP sets out information disclosure, consultation and grievance management arrangements throughout implementation.
Standard 3 – Resource Efficiency and Pollution Prevention	**Relevant.** Construction activities will consume materials, water and energy and generate excavated material, waste, dust, noise and emissions. Measures are also required to prevent soil and water contamination and minimise water losses during operation and maintenance.
Standard 4 – Biodiversity and Ecosystems	**Relevant.** Excavation, vegetation clearance, material sourcing and potential releases to receiving waters require consideration of biodiversity and ecosystem impacts. Potential effects on protected areas, sensitive habitats and species will be assessed, including indirect and downstream impacts where relevant.
Standard 5 – Climate Change	**Relevant.** Climate-related risks, including flooding, extreme rainfall and drought, need to be considered in the design and operation of the drinking water infrastructure. Opportunities to minimise water losses, energy consumption and greenhouse gas emissions will also be considered.
Standard 6 – Involuntary Resettlement	**Relevant for screening and management of potential displacement impacts.** Available project information indicates that works will follow existing publicly owned roads and that additional land acquisition is not required. Nevertheless, temporary land use, access restrictions and potential livelihood impacts will be assessed. Any physical or economic displacement will be addressed in accordance with this standard and the Project RF.
Standard 7 – Vulnerable Groups, Indigenous Peoples and Gender	**Relevant.** The assessment and stakeholder engagement process will identify potentially vulnerable or disadvantaged persons and groups, including those affected by the earthquakes. Measures will address barriers to participation, disproportionate impacts and gender-related risks, including sexual exploitation and abuse and sexual harassment.
Standard 8 – Labour Rights	**Relevant.** Construction and operation will involve workers engaged by HATSU, contractors and subcontractors. Requirements include fair employment conditions, non-discrimination, prevention of child and forced labour, respect

EIB Standard	Relevance to the Subproject
	for workers' rights and access to a workers' grievance mechanism.
Standard 9 – Health, Safety and Security	**Relevant.** Excavation, trenching, lifting operations, machinery, traffic and work in confined spaces present occupational and community safety risks. Appropriate measures will address trench collapse, falls, hazardous atmospheres, potential exposure to asbestos-containing materials, drinking water contamination, emergency response and public access to work areas.
Standard 10 – Cultural Heritage	**Relevant.** Excavation and ground disturbance may encounter previously unidentified cultural heritage. Potential impacts on known heritage assets will be assessed, and a Chance Finds Procedure will be implemented during construction.
Standard 11 – Intermediated Finance	**Not relevant.** The Project ESMF identifies this standard as not applicable to the Project's financing arrangements. İLBANK acts as the Project Promoter, and HATSU is the Final Beneficiary.

The principal national legislation and international conventions relevant to the management of the Subproject's environmental, social, health and safety risks are summarised below. These requirements complement the EIB Environmental and Social Standards, relevant EU requirements and GIIP references identified above.

Table 2 Principal National Legislation Relevant to the Subproject

Legislation	Relevance to the Subproject
Environmental Law (No. 2872)	Establishes the framework for environmental protection, pollution prevention, environmental assessment, permitting, waste management and environmental monitoring. It applies to the construction, operation and maintenance of the drinking water network and related infrastructure.
Environmental Impact Assessment Regulation, as amended	Establishes national environmental screening and assessment procedures. The Subproject must comply with the applicable screening decision and any conditions specified by the competent authority.
Labour Law (No. 4857)	Regulates employment contracts, wages, working hours, overtime, rest periods, leave, equal treatment and restrictions on child labour. It applies to workers engaged in Subproject activities.

Occupational Health and Safety Law (No. 6331)	Establishes employer and worker responsibilities for risk assessment, prevention of occupational accidents and diseases, training, health surveillance, emergency preparedness and incident notification. It is particularly relevant to excavation, trenching, machinery operation and confined-space work.
Trade Unions and Collective Labour Agreements Law (No. 6356)	Protects workers' rights concerning freedom of association, trade union membership and collective bargaining.
Expropriation Law (No. 2942)	Governs land acquisition, compensation and the establishment of easement rights where required. Additional land acquisition is not currently anticipated; its provisions will be considered if changes to the Subproject require land acquisition or easements.
Zoning Law (No. 3194)	Provides the framework for planning and construction activities. Relevant planning, construction and authorisation requirements will be observed for Subproject components.
Law on the Protection of Cultural and Natural Assets (No. 2863)	Governs the protection of cultural and natural assets, including notification and protection requirements where previously unidentified assets are encountered during excavation. It provides the national legal basis for the Chance Finds Procedure.
Right to Information Law (No. 4982)	Establishes procedures for access to information held by public institutions and supports transparency and access to Subproject-related information.

Applicable implementing regulations will also be observed, including those governing drinking water quality, water and soil pollution, waste management, excavation and construction waste, air emissions, environmental noise, environmental permits, occupational risk assessment, construction safety, asbestos-related work, work equipment, personal protective equipment and workplace emergency arrangements. All legislation will be applied together with its amendments in force during Subproject implementation.

International Conventions and Agreements

In addition to the international standards identified above, the following conventions and agreements listed in the Project ESMF are relevant, according to the Subproject's activities and potential impacts:

- **Labour rights and occupational health and safety:** ILO fundamental conventions concerning forced labour (Nos. 29 and 105), freedom of association and collective bargaining (Nos. 87 and 98), equal remuneration and non-discrimination (Nos. 100 and 111), minimum working age and the worst forms of child labour (Nos. 138 and 182), and occupational safety and health (Nos. 155 and 187).
- **Climate change:** United Nations Framework Convention on Climate Change, Kyoto Protocol and Paris Agreement.
- **Biodiversity and ecosystems:** Convention on Biological Diversity, Bern Convention, Ramsar Convention and Convention on International Trade in Endangered Species of

Wild Fauna and Flora (CITES), where relevant to affected habitats, species and material sourcing.

- **Cultural heritage:** Convention Concerning the Protection of the World Cultural and Natural Heritage, European Convention on the Protection of the Archaeological Heritage, Convention for the Protection of the Architectural Heritage of Europe and Convention for the Safeguarding of the Intangible Cultural Heritage.
- **Hazardous substances and waste:** Basel Convention, Stockholm Convention, Rotterdam Convention and Minamata Convention, where their provisions are relevant to the substances, equipment or waste streams associated with the Subproject.

Where national requirements differ from the performance levels and measures set out in the applicable EHSGs, the more stringent requirements will apply to the Subproject.

1.4. Review and Update

This ESMP will be reviewed and updated by **HATSU**, as necessary, during Subproject implementation and operation to reflect changes in applicable national legislation, EIB environmental and social requirements, or Subproject conditions. Updates may be required following changes to the Subproject's scope, design, alignment, construction methods or implementation responsibilities; significant incidents or accidents; or findings from monitoring, inspections, stakeholder engagement and grievances that indicate the need for additional or revised mitigation measures.

HATSU will notify **İLBANK** of any proposed revisions and submit the updated ESMP for review and approval in accordance with the Project ESMF. Updates will maintain compliance with applicable national legislation, the EIB Environmental and Social Standards and the Project's environmental and social requirements. Relevant changes will be communicated to contractors, supervision consultants and affected stakeholders.

1.5. Implementation Arrangements

The Project Implementation Unit within İLBANK (İLBANK PIU), supported by the Project Management Consultant (PMC), will oversee ESMP implementation in coordination with HATSU. During construction, the Contractor will implement the required measures and ensure compliance by its subcontractors under the supervision of the Supervision Consultant. E&S monitoring reports will be submitted by the Contractor through the Supervision Consultant and PMC to İLBANK PIU. Each party will provide adequate staff and resources for its responsibilities.

HATSU, as the Final Beneficiary, will coordinate local activities and will be responsible for implementing the operational measures in this ESMP following completion and handover of the infrastructure.

Detailed roles and responsibilities are provided in Chapter 5.

2. SUBPROJECT DESCRIPTION

2.1.Subproject Information

The Reyhanlı and Kumlu Drinking Water Construction Project involves the renewal and completion of drinking water distribution networks serving Reyhanlı and Kumlu district centres, Hatay Province. It covers the remaining network works and additional needs identified following the February 2023 earthquakes. The Subproject includes drinking water pipelines, household connections, valves, fire hydrants and other auxiliary network structures, together with electrical installations and automation works for the Reyhanlı component. HATSU will operate and maintain the completed infrastructure.

The scope is distinct from earlier investments. In Reyhanlı, the PID reports that 93.5 km of network and 4,261 household connections were completed under MADAD financing. It also records the construction of the DY1 reservoir with an increased capacity of 10,000 m³ and the cancellation of the proposed DY2 reservoir and its associated pumping station and line. In Kumlu, the well supply and transmission system connecting six wells, 300 m³ and 5,000 m³ reservoirs, and the supplied settlements was completed in 2024. These completed facilities are not included as new construction under the Subproject.

Key technical information is summarised in the table below. Construction and operation activities are described in the following sections.

Table 3 Key Technical Information on the Subproject

Component	Features
Drinking water network	**Reyhanlı**: approximately 117.4 km of HDPE pipelines, with diameters of Ø110, Ø160, Ø200, Ø280, Ø355 and Ø630 mm. **Kumlu**: approximately 24.6 km of HDPE pipelines, with diameters of Ø90, Ø160, Ø200 and Ø280 mm.
Network fittings and auxiliary structures	Fire hydrants, valve chambers and other auxiliary network structures in both locations.
Household connections and road reinstatement	**Reyhanlı**: approximately 6,000 household connections using Ø32, Ø40 and Ø50 mm pipes. **Kumlu**: approximately 500 household connections using Ø32 and Ø40 mm pipes. Road surfaces affected by construction will be reinstated.
Electrical installations and automation	Electrical and automation works for reservoirs, pumping stations and network chambers under the **Reyhanlı** component. No separate electrical or automation component is identified in the current **Kumlu** investment breakdown.
Main distribution pipe upgrade	In Reyhanlı, the PID specifies replacement of the Ø450 mm main pipe from the DM3 reservoir with a Ø630 mm pipe.
Design horizon	**Reyhanlı**: 2050 in the approved design. **Kumlu**: 2051 in the approved design. Based on updated population projections, the PID estimates that the original hydraulic capacities would accommodate demand until approximately 2045 and 2048, respectively.
Drinking water network	**Reyhanlı**: approximately 117.4 km of HDPE pipelines, with diameters of Ø110, Ø160, Ø200, Ø280, Ø355 and Ø630 mm. **Kumlu**:

Component	Features
	approximately 24.6 km of HDPE pipelines, with diameters of Ø90, Ø160, Ø200 and Ø280 mm.

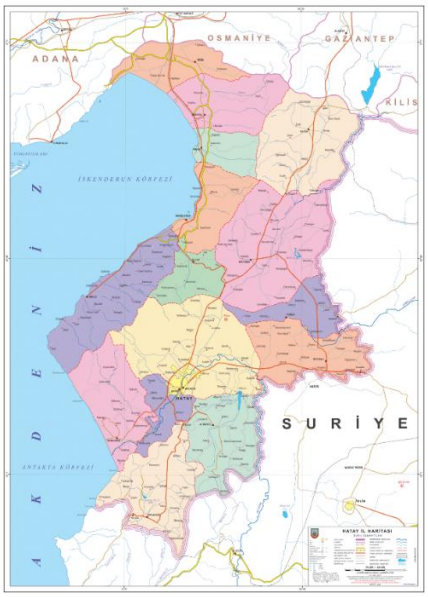
2.2.Subproject Location

The Subproject is located in Reyhanlı and Kumlu district centres in eastern Hatay Province, near the Syrian border. Reyhanlı lies south of Kumlu. Both settlements are situated within the predominantly flat terrain of the Amik Plain and its surroundings.

The works cover drinking water distribution network routes, household connections, auxiliary network structures and connections to the existing supply systems. Electrical and automation works also concern existing water supply facilities serving Reyhanlı.

Further information on land ownership and land acquisition status is provided in Section 3.4. The Subproject location is shown in the figures below




OSMANİYE
GAZİANTEP
ADANA
KİLİS
İSKENDERUN KÖRFEZİ
SURİYE
ANTAKYA KÖRFEZİ


Kumlu


Completed under MADAD 93,5 km
Current EIB Request 117 km
Gazimurseltepesi
Reyhanlı
Çakıryiğit
KARAKİLİÇ
Yenişehir
gle Earth
1 km

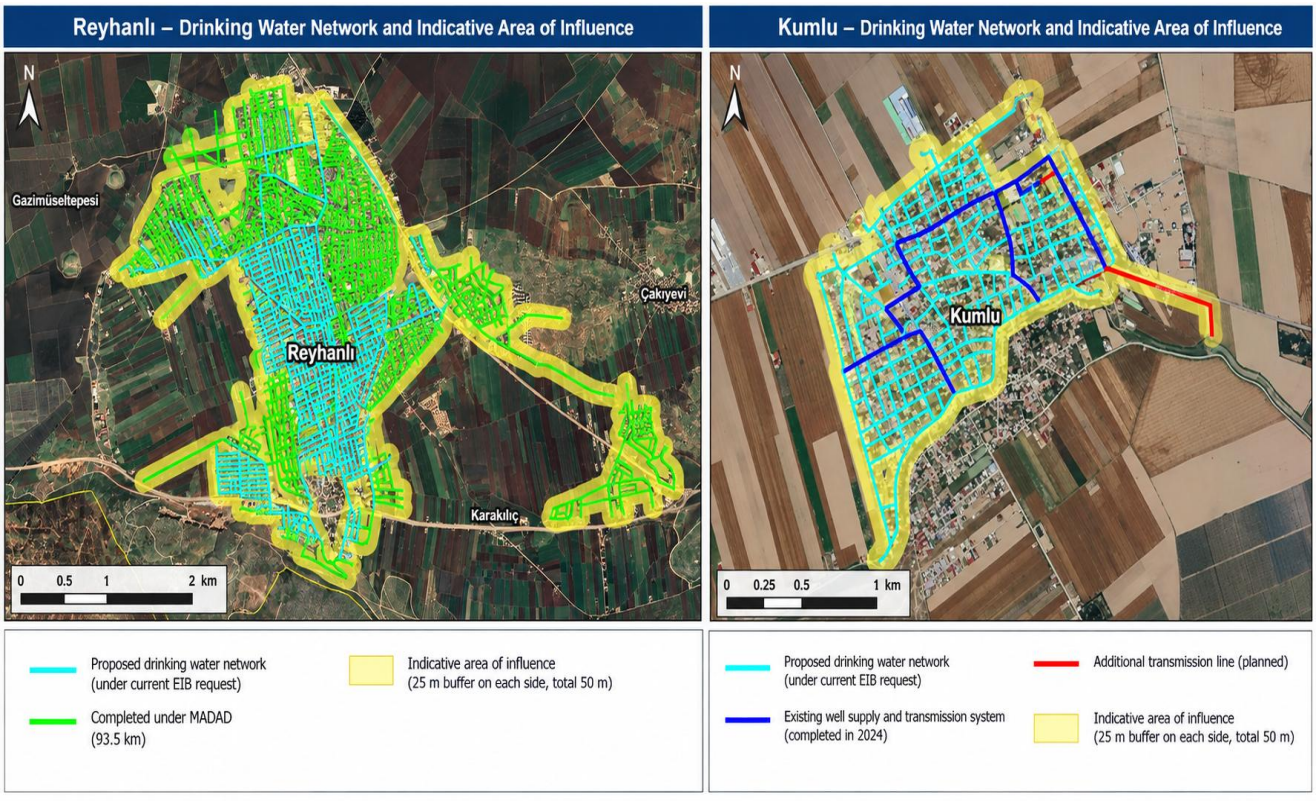
2.3. Subproject Impact Area

The Subproject's Area of Influence (AoI) includes the drinking water network routes, household connections, temporary work areas, and nearby homes, businesses and public facilities in Reyhanlı and Kumlu district centres that may be affected by construction-related noise, dust, traffic disruption, access restrictions and temporary water supply interruptions.

For the preliminary assessment, an indicative buffer of 25 m on each side of the pipeline alignments (a total corridor width of 50 m) has been considered. This distance was selected taking into account the nature of the construction works, including excavation, pipe installation, movement of construction machinery and temporary material storage. Potential impacts within this area include dust, noise, vibration, traffic disruption, temporary restrictions on access to properties and businesses, and temporary water supply interruptions.

The AoI also includes areas beyond this buffer that may be affected by construction traffic, material transportation, waste management and construction-related runoff. Potential cumulative impacts from other ongoing construction activities will also be considered where relevant.

The indicative AoI for Reyhanlı and Kumlu is illustrated in the figures below. As the buffer was estimated using the available project layouts rather than georeferenced data, its boundaries are approximate and will be verified before construction



2.4. Environmental and Social Baseline

The environmental and social baseline has been characterized through a desk review of the Reyhanlı and Kumlu Drinking Water Construction Project PID and supporting project fiches. Sources include population statistics, descriptions of existing infrastructure, topographic and climatic information, and geological and ground investigation findings summarized in the PID. These sources provide information on local conditions relevant to the assessment of the Subproject's environmental and social risks and impacts. Historical descriptions are distinguished from subsequent infrastructure improvements reported in the PID.

2.4.1. Physical Environment

Reyhanlı and Kumlu are predominantly lowland settlements associated with the Amik Plain. The geotechnical information summarized in the PID describes different ground conditions for the two locations. Investigations undertaken in Reyhanlı in 2015 identified mainly Pliocene limestone and weathered limestone along the network routes. Investigations undertaken in Kumlu in 2016 identified Quaternary alluvial deposits, generally comprising sandy clay, sand and silty clay.

No groundwater was encountered in the investigation pits reported for either location. These findings relate to the earlier investigations and do not exclude local or seasonal groundwater during construction. Excavation methods, trench support and dewatering arrangements will therefore reflect the conditions encountered at each work location.

The area has a Mediterranean climate, with hot, dry summers and mild, rainy winters. Hatay is highly seismically active and was severely affected by the February 2023 earthquakes. Seasonal rainfall, drought and seismic conditions require consideration in infrastructure design and construction planning.

Project-specific baseline air quality and noise measurements are not available in the reviewed documents. Further information on regional physical conditions and project geotechnical findings is provided in Sections 2.8–2.11, 5.5.3 and 5.6.3 of the PID.

2.4.2. Biodiversity

The Subproject concerns drinking water networks serving two district centres within a wider landscape characterised by settlements and agricultural land. The PID describes agricultural vegetation, gardens, orchards and locally occurring trees in Reyhanlı and extensive agricultural land around Kumlu. The reviewed documents do not include route-specific habitat mapping or species surveys. Information on invasive alien species and ecosystem services is also limited.

An official opinion will be obtained from the relevant Directorate of Nature Conservation and National Parks regarding potential impacts on protected areas, habitats and species. Any measures required by the authority will be incorporated into the ESMP, together with the applicable requirements of EIB Standard 4.

2.4.3. Socio-Economic Environment

This section describes the socio-economic conditions of Reyhanlı and Kumlu Districts in Hatay Province, where the Reyhanlı and Kumlu Drinking Water Subproject will be implemented. The assessment addresses population, land use, livelihoods, education and healthcare, infrastructure, transportation, cultural heritage, and disadvantaged or vulnerable groups.

2.4.3.1. Demography and Population

The Reyhanlı and Kumlu Drinking Water Subproject is located in the district centres of Reyhanlı and Kumlu, Hatay Province.

According to the 2025 Address-Based Population Registration System (ADNKS) results, Reyhanlı District has a total population of 117,645, comprising 59,394 males and 58,251 females. Kumlu District has a total population of 16,242, comprising 8,580 males and 7,662 females

Table. Population of Reyhanlı and Kumlu Districts (2025)

District	**Male**	**Female**	**Total**
Reyhanlı	59,394	58,251	117,645
Kumlu	8,580	7,662	16,242
Total	67,974	65,913	133,887

Source: TÜİK, 2025 ADNKS Population Results, as reproduced by secondary population-data websites.

The population consists of approximately 50.5% males and 49.5% females in Reyhanlı, and 52.8% males and 47.2% females in Kumlu.

The earthquakes of 6 February 2023 affected settlements and infrastructure throughout Hatay Province. Population movements and ongoing reconstruction activities may have changed the number and distribution of residents in the Subproject area

2.4.3.2. Land Ownership Status and Land Use by Affected People

The Reyhanlı and Kumlu Drinking Water Subproject is located in Reyhanlı and Kumlu Districts of Hatay Province. Land use in the Subproject area includes residential areas, local businesses, agricultural areas and public roads.

The Subproject involves the construction and rehabilitation of approximately 117.4 km of drinking water distribution pipelines and 6,000 household connections in Reyhanlı, and approximately 24.6 km of drinking water distribution pipelines and 500 household connections in Kumlu, together with associated network structures.

The drinking water pipelines are planned mainly along existing public roads and streets. Therefore, permanent land acquisition or loss of agricultural land and livelihood activities is not anticipated from the pipeline works. However, any land requirements outside existing public road corridors,

including temporary construction areas and material storage sites, will be identified and assessed before construction.

During construction, excavation works and temporary road closures may restrict access to residential properties, agricultural fields, shops and other workplaces. Transportation of agricultural products and daily commercial activities may also be temporarily affected, particularly along narrow local roads. These impacts are expected to be temporary and localized. The Contractor will maintain access to agricultural properties and businesses wherever possible, provide temporary crossings where necessary, and inform affected residents and business owners in advance of construction activities.

The Subproject may also create temporary employment opportunities during construction. In the long term, improved drinking water services are expected to contribute positively to public health, living conditions and the quality of life in Reyhanlı and Kumlu Districts.

2.4.3.3. Education and Health Services

Education

Educational services in the Subproject area are provided through public schools operating under the Ministry of National Education. Reyhanlı and Kumlu District centres are served by kindergartens, primary schools, secondary schools and high schools.

Educational facilities identified in Reyhanlı District include Reyhanlı Secondary School, Şehit Adnan Göçer Secondary School, 8 Temmuz Secondary School, Reyhanlı Türkiye Odalar ve Borsalar Birliği Anatolian High School and İsmet Ayşe Behzatoğlu Anatolian High School.

In Kumlu District, educational facilities include Kumlu Primary School, Kumlu Secondary School and Kumlu Anatolian High School.

These educational facilities are important sensitive receptors within the Subproject area, particularly during excavation and drinking water pipeline installation works.

Health Services

Healthcare services in the Subproject area are provided through Family Health Centres (FHCs) and public hospitals serving Reyhanlı and Kumlu Districts.

In Reyhanlı, Reyhanlı State Hospital provides secondary and emergency healthcare services to the district and surrounding settlements. Primary healthcare services are provided through several Family Health Centres, including Gani Bahadırlı Family Health Centre, Osman Bahadırlı Family Health Centre and Hatice Murat Narlı Family Health Centre.

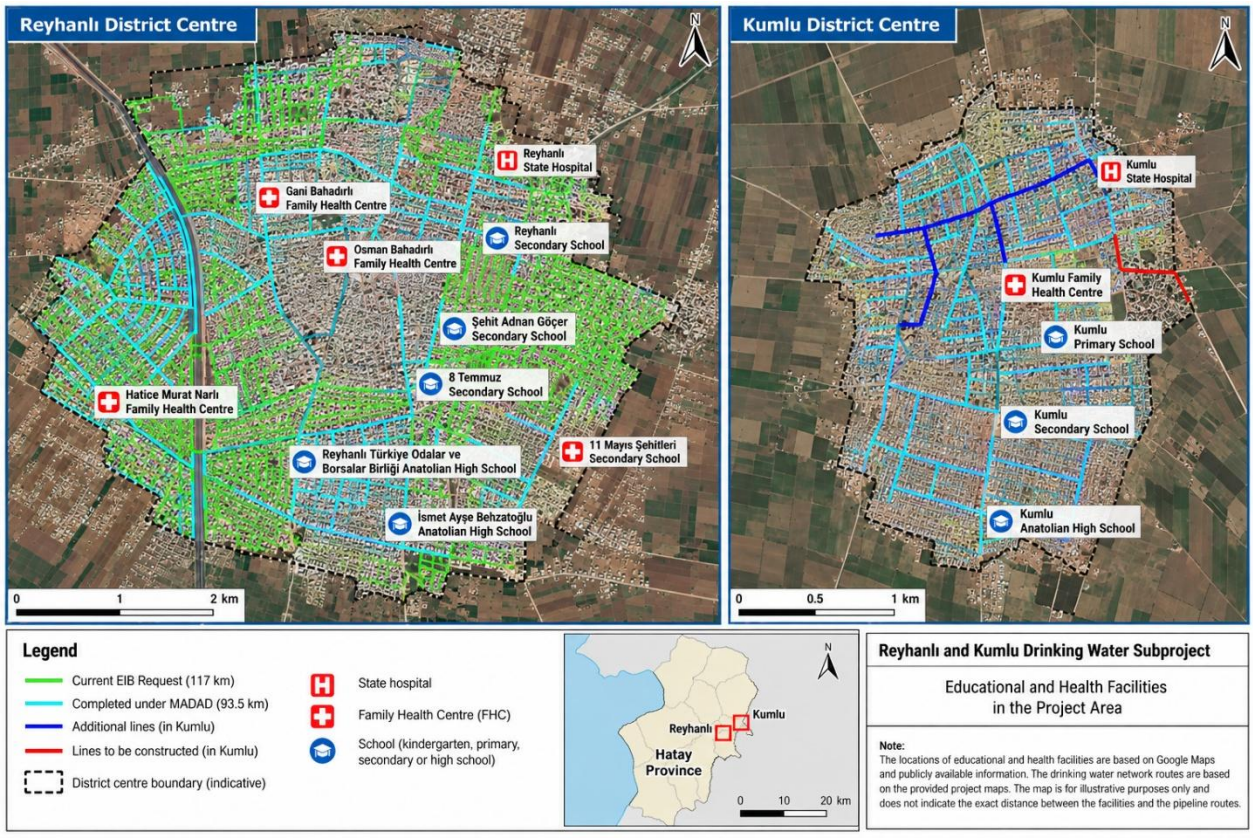
In Kumlu, Kumlu State Hospital provides healthcare services to the district and surrounding settlements, while Kumlu Family Health Centre provides primary healthcare services, including general examinations, vaccination and preventive healthcare.

Healthcare facilities located near the drinking water network routes are considered potential sensitive receptors, particularly where excavation and pipeline installation works may affect access to healthcare services.

As the drinking water pipelines will mainly be constructed along existing public roads and streets, construction activities may cause temporary noise, dust, traffic disruption and restrictions on pedestrian and vehicle access near educational and healthcare facilities.

The Contractor will implement appropriate measures to maintain safe and uninterrupted access to schools and healthcare facilities, including temporary pedestrian crossings, warning signs, traffic management arrangements and advance notification of affected institutions and communities. Particular attention will be given to school opening and closing hours, and access for ambulances and other emergency vehicles will be maintained throughout construction.

The locations of educational and healthcare facilities in relation to the drinking water network are illustrated in the figure below.



2.4.3.1. Infrastructure Services

Water supply and wastewater services in Reyhanlı and Kumlu Districts are provided by Hatay Metropolitan Municipality Water and Sewerage Administration General Directorate (HATSU). The Reyhanlı and Kumlu Drinking Water Subproject covers the district centres, where the existing drinking water distribution networks have become inadequate due to ageing infrastructure, frequent pipe failures, high water losses and insufficient water pressure.

In Reyhanlı, the existing drinking water distribution network consists of PVC, asbestos cement and polyethylene pipes, some of which have reached the end of their economic life. The Subproject includes the construction and rehabilitation of approximately 117.4 km of drinking water distribution pipelines, 6,000 household connections and associated network structures, including isolation valves, fire hydrants and flow measurement chambers. Approximately 93.5 km of drinking water pipelines and 4,261 household connections were previously completed under MADAD funding.

In Kumlu, drinking water is supplied from groundwater wells through the existing transmission and storage system. The Subproject includes approximately 24.6 km of drinking water distribution pipelines, 500 household connections and associated network structures. The existing water supply infrastructure includes six groundwater wells, a 300 m^3 collection reservoir, a 5,000 m^3 service reservoir and associated transmission facilities, which were completed in 2024 and are not included in the current construction scope.

The proposed drinking water infrastructure aims to improve the reliability and continuity of water supply, reduce water losses, improve network pressure and meet the drinking water needs of the population in Reyhanlı and Kumlu.

Wastewater collection services are also provided by HATSU. Reyhanlı is served by an existing sewerage network and wastewater treatment plant, while Kumlu has an existing wastewater collection system. In addition to water supply and wastewater infrastructure, both districts are served by electricity, telecommunications, roads and municipal solid waste collection services.

During construction, excavation and pipeline installation works may temporarily affect existing underground utilities, road access and water supply services. Necessary measures will be implemented to protect existing infrastructure and minimise service interruptions in coordination with HATSU and other relevant utility providers. Affected residents and businesses will be informed in advance of any planned service interruptions.

2.4.3.1. Transportation and Traffic

Reyhanlı and Kumlu Districts are located in Hatay Province and are connected to Antakya and surrounding settlements through the existing road network. Transportation within the Subproject area is mainly provided by public roads and local streets serving residential areas, commercial establishments, agricultural areas and other community facilities.

The proposed drinking water pipelines in Reyhanlı and Kumlu will mainly be installed along existing public roads and streets within the district centres. Therefore, the Subproject does not involve the construction of new roads or permanent changes to the existing transportation network.

Construction activities will be carried out progressively along the pipeline routes. Temporary traffic restrictions, partial road closures and disruptions to pedestrian and vehicle access may occur during excavation, pipe installation and road reinstatement works. Transportation of construction materials and movement of construction machinery may also temporarily affect local traffic, particularly along narrow streets and roads used for agricultural activities.

These impacts will be managed through appropriate traffic management measures, including warning signs, temporary traffic arrangements, safe pedestrian crossings and advance notification of affected residents and businesses.

Particular attention will be given to maintaining access to residential properties, commercial establishments, agricultural fields, schools and healthcare facilities. Access for emergency vehicles will be maintained throughout construction.

As the works will mainly be undertaken within existing road corridors and affected road surfaces will be reinstated following construction, no permanent adverse impacts on transportation or road access are anticipated. Following completion of the works, the existing road network will continue to serve local communities without changes to its current function.

2.4.3.2. Cultural Heritage (Tangible and Intangible)

Reyhanlı and Kumlu Districts are located in Hatay Province, a region with a rich historical and cultural heritage reflecting the different civilizations that have inhabited the area. Both districts are situated within the Amik Plain, which has historically been an important settlement and agricultural area.

The main cultural heritage assets in the wider Subproject area include:

- **Tell Atchana (Alalakh):** Located in the wider Reyhanlı area, Tell Atchana is an important archaeological settlement dating back to the Bronze Age. The site contains remains of the ancient city of Alalakh and reflects the historical significance of the Amik Plain.
- **Tell Tayinat**: Located in the wider Reyhanlı area, Tell Tayinat is an archaeological site containing remains from the Bronze and Iron Ages. The site provides evidence of the region's historical settlement patterns and cultural development.

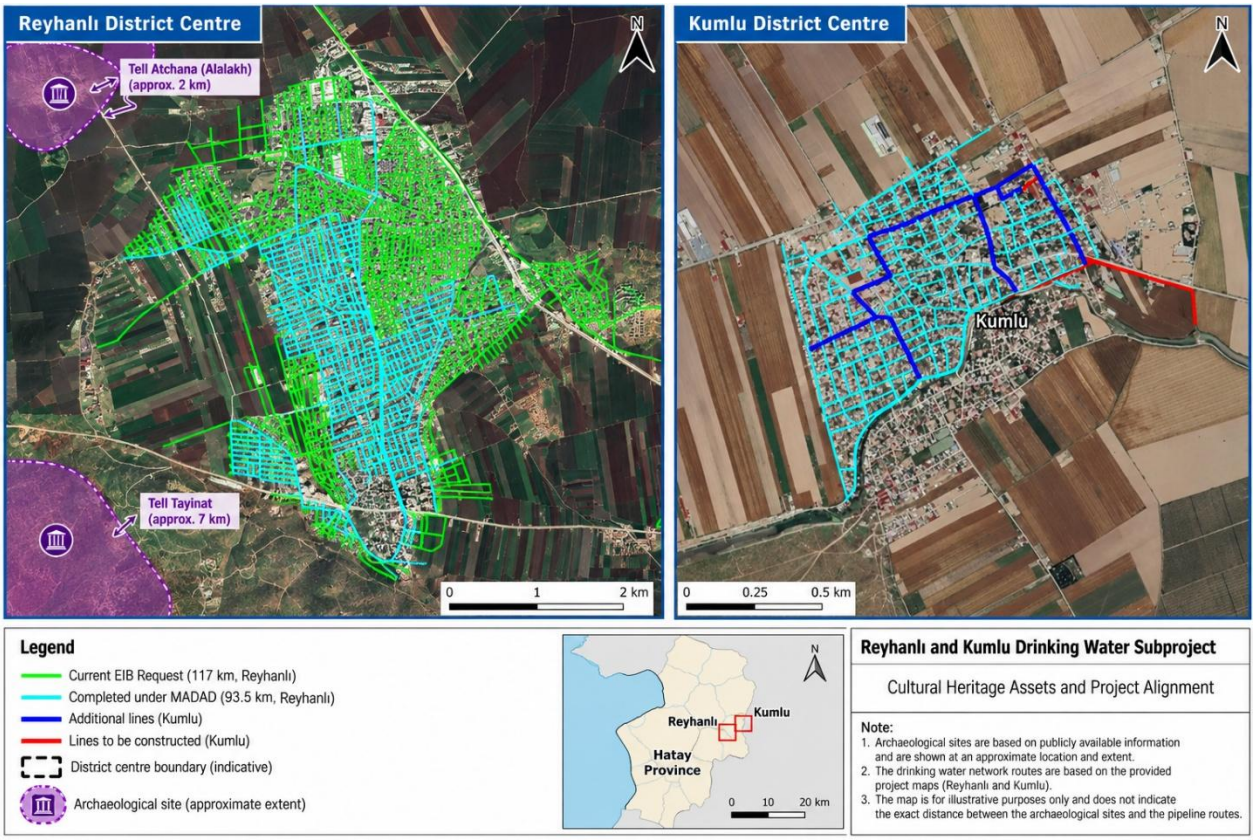
The Reyhanlı and Kumlu Drinking Water Subproject involves the construction and rehabilitation of approximately 117.4 km of drinking water distribution pipelines in Reyhanlı and 24.6 km in Kumlu, together with household connections and associated network structures. The pipelines will mainly be installed along existing public roads and streets.

The locations of Tell Atchana and Tell Tayinat in relation to the Reyhanlı drinking water network are illustrated indicatively in the figure below. These archaeological sites are located within the wider region, and their direct interaction with the proposed pipeline routes has not been identified based on the available project information.

For Kumlu, no registered archaeological sites or cultural heritage assets have been identified along the proposed drinking water pipeline routes based on the project information currently available. However, this does not exclude the possible presence of previously unknown archaeological remains.

A Chance Finds Procedure will be implemented as part of the ESMP. In the event of an unexpected archaeological discovery, construction activities in the affected area will be stopped immediately, the site will be secured, and the relevant cultural heritage authorities will be notified in accordance with national legislation. Construction will resume only after the necessary assessments and approvals have been completed.

Potential impacts on tangible and intangible cultural heritage will be minimised through appropriate construction planning, implementation of the Chance Finds Procedure and coordination with the relevant authorities.



2.4.3.1. Disadvantaged or Vulnerable Individuals or Groups

In accordance with the European Investment Bank (EIB) Environmental and Social Standard 7 – Vulnerable Groups, Indigenous Peoples and Gender, particular attention should be given to individuals and groups who may be disproportionately affected by project-related activities or face barriers to accessing project benefits due to their socioeconomic circumstances, gender, age, disability, health status, or other factors contributing to vulnerability, marginalisation or discrimination.

Hatay was significantly affected by the earthquakes of 6 February 2023, which caused damage to residential buildings, public infrastructure and essential services. The resulting disruption to housing conditions, livelihoods and access to basic services may have increased existing socioeconomic vulnerabilities among earthquake-affected communities.

Based on the available socioeconomic information, potentially disadvantaged or vulnerable individuals and groups within the Subproject service area include low-income households, female-headed households, elderly individuals aged 65 and above, persons with disabilities, unemployed

individuals and earthquake-affected households experiencing continued housing or livelihood difficulties.

These groups may be particularly sensitive to temporary construction-related impacts, including noise, dust and increased traffic. In addition, certain individuals may experience difficulties accessing Subproject information or participating in consultation activities due to mobility limitations, financial constraints or other socioeconomic barriers.

The sewerage network and pumping mains are designed to follow existing public roads and municipal road corridors. No informal land users or residential structures have been identified within the site, and no physical or economic displacement is anticipated. Therefore, no direct land acquisition-related impacts on disadvantaged or vulnerable individuals or groups are expected.

In accordance with EIB Environmental and Social Standards 2 and 7, information disclosure and consultation activities will be conducted in an inclusive and accessible manner, with particular attention to the needs of disadvantaged or vulnerable groups. Appropriate communication methods will be used to facilitate their participation, and the Subproject grievance mechanism will be accessible to all affected individuals, including those requiring additional assistance.

Overall, no significant disproportionate adverse impacts on disadvantaged or vulnerable individuals or groups are anticipated, provided that the mitigation measures and inclusive consultation arrangements specified in this ESMP are effectively implemented.

3. SUBPROJECT ACTIVITIES

3.1.Construction Phase

3.1.1. Construction Activities

Construction is expected to take approximately 24 months, subject to the confirmed contract schedule.

Works will include site mobilisation, identification of existing utilities, trench excavation and support, dewatering where necessary, and installation of drinking water pipelines and household connections in Reyhanlı and Kumlu. Valves, fire hydrants and other auxiliary network structures will also be installed. The Reyhanlı component includes electrical installations and automation works for reservoirs, pumping stations and network chambers. Pipelines will undergo testing, flushing and disinfection before commissioning. Works will also include backfilling, connections to the existing system and reinstatement of affected road surfaces.

Typical equipment will include excavators, loaders, trucks, compactors, lifting equipment and dewatering pumps. Pipes, concrete, aggregates and other materials will be obtained from authorised suppliers. Suitable excavated material will be reused where appropriate.

Water required for construction will be supplied from HATSU-approved sources. Wastewater, construction waste, fuel and oils will be managed in accordance with the mitigation measures in this ESMP. The PID identifies asbestos-cement pipes in the older networks of both settlements. Works affecting these pipes, and any other asbestos-containing materials encountered, will be managed in accordance with the applicable ESMP measures. Temporary facilities will be removed and disturbed areas reinstated after construction.

3.1.2. Construction Facilities

Temporary construction facilities may include site offices, material and equipment storage areas, and designated waste storage areas. Their locations, layout and any worker accommodation arrangements will be determined by the Contractor and included in the C-ESMP before site mobilisation.

Facilities will be provided with appropriate water supply, sanitation and waste management arrangements. Temporary facilities will be dismantled after construction, and the areas will be cleared and reinstated.

3.2. Operation Phase

3.2.1. Operation Activities

HATSU will operate and maintain the completed drinking water networks and associated structures as part of the existing Reyhanlı and Kumlu drinking water supply systems.

Routine activities will include leak detection and repair, monitoring of water quality, pressure and flow, inspection and maintenance of pipelines, valves, network chambers, fire hydrants and household connections, and maintenance of the electrical and automation equipment installed under the Reyhanlı component. Wastewater and waste generated during flushing, cleaning and maintenance will be managed in accordance with the applicable ESMP measures.

3.2.2. Operation Facilities

The operational facilities comprise:

- Drinking water distribution pipelines and household connections in Reyhanlı and Kumlu;
- Valves, fire hydrants and auxiliary network chambers in both locations;
- The upgraded Ø630 mm main distribution pipe from the DM3 reservoir in Reyhanlı;
- Electrical and automation installations for reservoirs, pumping stations and network chambers under the Reyhanlı component

3.3.Labor Requirements

The number of workers required during construction and operation has not yet been confirmed. The Contractor will determine construction staffing and any accommodation needs in the C-ESMP. Local employment will be prioritised where feasible. HATSU will determine staffing requirements for operation and maintenance.

3.4. Land Acquisition Status

The Reyhanlı and Kumlu Drinking Water Subproject will be implemented in Reyhanlı and Kumlu Districts of Hatay Province. The Subproject comprises approximately 117.4 km of drinking water distribution pipelines and 6,000 household connections in Reyhanlı, and approximately 24.6 km of drinking water distribution pipelines and 500 household connections in Kumlu, together with associated network structures and infrastructure.

The proposed drinking water pipelines will mainly be constructed along existing public roads and streets. Therefore, permanent land acquisition is not anticipated for the pipeline routes. Excavation and pipe installation works may temporarily restrict access to residential properties, commercial establishments, agricultural fields and other facilities along the pipeline alignments. These restrictions will be managed through appropriate construction planning and access arrangements.

Construction activities will be planned to remain within the designated project areas and existing road corridors. Any temporary land occupation required for construction equipment, material storage or other construction-related activities outside public road corridors will be identified and assessed before construction. Temporary access restrictions and potential disturbances to surrounding land uses will be managed through the mitigation measures specified in the ESMP.

In the event of any changes to the Subproject design, pipeline alignments or construction areas that may require additional land acquisition, temporary land occupation or restrictions on land use, the potential impacts on landowners, land users and livelihoods will be assessed in accordance with EIB Environmental and Social Standard 6 – Involuntary Resettlement. Where applicable, the necessary mitigation measures and environmental and social documentation will be prepared before the implementation of such changes.

Any land acquisition or temporary land-use arrangements arising from project modifications will be documented by HATSU in accordance with national legislation and the applicable EIB Environmental and Social Standards.

3.5. Permitting Status

The available permitting information is summarised below:

- EIA status: The Subproject's national EIA screening status will be confirmed through project-specific documentation issued by the competent authority.
- Project approval: According to the PID, the drinking water designs were prepared by Canalp Engineering and approved by İLBANK in 2015 for Reyhanlı and 2019 for Kumlu.
- Nature conservation opinion: An official opinion will be obtained from the relevant Directorate of Nature Conservation and National Parks regarding potential impacts on protected areas, habitats and species.
- Other approvals: Requirements for road excavation, traffic arrangements, utility connections and crossings, and electrical and automation installations will be confirmed with the relevant authorities. Necessary approvals will be obtained before the respective works begin.

HATSU will confirm any authorisations required for operation before commissioning.

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4. ESMP MATRIX: RISKS AND IMPACTS, MITIGATION AND MONITORING

The following matrix sets out the mitigation measures, monitoring requirements and responsibilities for managing the Subproject's environmental and social risks during construction and operation. It is based on the general ESMP provided in Annex 2 of the Project ESMF and adapted to the drinking water networks and auxiliary structures in Reyhanlı and Kumlu, including electrical and automation works under the Reyhanlı component.

The Contractor will use the relevant construction-phase requirements to prepare and implement the C-ESMP. HATSU will implement the operational measures.

4.1.Construction and Operation ESMP Matrix

Environmental and Social Mitigation and Monitoring Matrix

İLBANK PIU will oversee implementation of the matrix, supported by the PMC. During construction, the Contractor will implement the measures, including through its subcontractors, under the supervision of the Supervision Consultant. HATSU will implement the operational measures.

Ref.	Potential Risks and Impacts	Proposed Mitigation Measures	Phase	Monitoring Indicators	Monitoring Frequency	Responsibility: Implementation / Monitoring
1	Environmental and social management	Prepare and obtain approval of the C-ESMP and relevant management plans before construction. Provide E&S and OHS training to workers and responsible staff. Record non-compliances and implement corrective actions. Notify HATSU immediately of significant incidents. HATSU will notify İLBANK PIU within 24 hours and submit the detailed investigation report, including root cause analysis and corrective actions, within 15 days. Submit quarterly E&S monitoring reports through the Supervision Consultant and PMC to İLBANK PIU. Submit monthly OHS forms for review by the Supervision	Planning and construction	Approved C-ESMP; training records; inspection reports; corrective action and incident records	Before construction; daily site checks; monthly review; immediately following significant incidents	Contractor; PMC for assigned training and support / Supervision Consultant and İLBANK PIU

		Consultant. İLBANK PIU will report to EIB every six months.				
2	Permitting and design compliance	Confirm the validity and coverage of existing approvals and obtain additional permits required for the works. Obtain the Nature Conservation and National Parks opinion and incorporate its requirements. Confirm road excavation, traffic, utility crossing and electrical installation approvals where required. Apply relevant seismic design requirements.	Planning and construction	Permit register; approved designs; official opinions; approval conditions incorporated into work methods	Before the relevant activity; following design or scope changes; monthly register review	HATSU and Contractor, according to their responsibilities / Supervision Consultant and İLBANK PIU
3	Fuel, chemical spills and contaminated soil	Minimise hazardous material inventories. Store fuels and chemicals on impermeable surfaces with secondary containment. Tank containment will accommodate at least 110% of the largest tank or 25% of the combined volume, whichever is greater. Use drip trays during refuelling and maintenance. Provide spill kits, train workers and immediately contain spills. Transfer contaminated materials to authorised facilities.	Construction	Storage conditions; containment capacity; spill kits; spill records; contaminated material disposal records	Daily visual checks; immediately following spills; monthly review	Contractor / Supervision Consultant
4	Topsoil loss, soil disturbance and erosion	Strip and store topsoil separately where vegetated ground is affected. Limit the working	Construction	Condition of stockpiles; drainage and erosion controls;	Daily during earthworks; after	Contractor / Supervision Consultant

		footprint and protect stockpiles from erosion, contamination and dust. Provide drainage and sediment controls. Reuse suitable excavated material and reinstate disturbed areas promptly. Stabilise stockpiles retained for extended periods.		reinstatement records; evidence of sediment movement	heavy rainfall; monthly review	
5	Surface water pollution	Protect local streams and drainage channels from sediment, waste, fuel and concrete washwater. Keep stockpiles and equipment away from watercourses. Provide drainage and sediment controls, collect and treat contaminated runoff where necessary, and prevent uncontrolled discharges. Prevent excavated material and construction debris from entering watercourses or blocking drains. Reinstate areas disturbed by construction.	Planning and construction	Condition of nearby watercourses and drainage channels; sediment controls; runoff management; pollution incidents; water quality results where required	Before earthworks; daily near watercourses and drainage channels; after heavy rainfall; monthly review	Contractor, with HATSU coordination / Supervision Consultant
6	Groundwater pollution and excavation dewatering	Plan excavations using the available ground investigation findings and actual site conditions. Provide suitable trench support and dewatering where groundwater or accumulated water is encountered. Direct dewatering	Construction	Dewatering arrangements; discharge location and condition; treatment controls; water quality results where necessary; spill records	Daily during excavation and dewatering; following suspected contamination; monthly review	Contractor / Supervision Consultant

		water through settlement or treatment where necessary and confirm an authorised discharge arrangement. Investigate suspected contamination before discharge.				
7	Material sourcing and resource consumption	Prioritise suitable local suppliers where feasible. Obtain aggregates, concrete, asphalt and other materials from facilities holding the required permits and licences. Verify supplier documentation and store materials safely. Avoid unnecessary material use and transport.	Planning and construction	Supplier permits and licences; delivery records; material storage conditions	Before supplier selection; when suppliers change; monthly review	Contractor / Supervision Consultant
8	Excavated material management	Separate topsoil, reusable excavation material and unsuitable material. Reuse suitable material for backfilling following technical approval. Keep roads, drains and property entrances clear. Transport surplus material in covered vehicles to authorised reuse or disposal locations and maintain transfer records.	Construction	Excavation and reuse quantities; storage conditions; approved disposal locations; transport and disposal records	Daily during earthworks; monthly records review	Contractor / Supervision Consultant
9	Hazardous and non-hazardous waste	Implement a site-specific Waste Management Plan. Minimise, segregate, label and securely store waste. Provide covered	Construction	Waste storage conditions; quantities and waste codes; transporter	Daily visual checks; at each waste transfer; monthly review	Contractor / Supervision Consultant

		containers and impermeable storage for hazardous waste. Use authorised transporters and receiving facilities and retain records. Locate dedicated waste storage at least 300 m from rivers, streams, lakes and wetlands. Locate designated refuelling areas at least 50 m from drainage structures and 100 m from important water bodies. Prohibit waste burning and dumping.		and facility authorisations; transfer records; complaints		
10	Asbestos-containing pipes and materials	The PID identifies asbestos-cement pipes in the older networks of both Reyhanlı and Kumlu. Identify sections that may be disturbed and prepare and obtain approval of an Asbestos Management Plan before works affecting these pipes. Avoid unnecessary disturbance and restrict access to affected work areas. Use appropriately qualified and trained personnel, suitable respiratory protection and other PPE, controlled wet methods, sealed and labelled packaging and authorised transport and disposal. Avoid breaking, cutting	Planning and construction	Pre-work identification and assessment records; approved Asbestos Management Plan; worker qualifications and training; access controls; PPE and removal methods; exposure monitoring where required; transport and disposal records	Before disturbing existing infrastructure; continuously during asbestos work; immediately upon unexpected discovery; monthly records review	Contractor / Supervision Consultant

		or grinding asbestos-cement pipes. If additional suspected materials are encountered unexpectedly, stop work in the affected area and arrange competent assessment before disturbance. Do not reuse asbestos-containing material.				
11	Water consumption and domestic wastewater	Obtain water from HATSU-approved sources without affecting community supplies. Provide safe drinking water and adequate sanitation. Collect domestic wastewater in an authorised sewer connected to functioning treatment or in watertight holding tanks emptied by authorised services. Keep clean drainage separate from contaminated water and prohibit untreated wastewater discharge.	Construction	Water supply arrangements; sanitation conditions; wastewater collection and disposal records; complaints	Daily checks; at each tank emptying; monthly review	Contractor / Supervision Consultant
12	Sexual exploitation and abuse and sexual harassment	Require all workers to sign a Code of Conduct and receive SEA/SH training. Provide safe, confidential reporting channels through the community and workers' grievance mechanisms. Protect personal information and refer complaints to appropriate support services using a survivor-centred approach. Prepare a	Planning and construction	Signed Codes of Conduct; training coverage; accessible confidential reporting channels; referral arrangements; action plan where required	At recruitment and induction; regular refresher training; monthly review without disclosing confidential case details	Contractor and HATSU within their responsibilities / Supervision Consultant and İLBANK PIU

		SEA/SH Prevention and Response Action Plan where indicated by the risk assessment.				
13	Dust emissions	Implement the air quality measures included in the C-ESMP. Spray exposed surfaces and haul routes as needed, cover dusty loads, protect stockpiles and clean affected roads. Apply site speed limits and suspend or adjust activities causing excessive dust. Prohibit open burning. Monitor PM10 at representative sensitive receptors during earthworks and respond promptly to exceedances and complaints.	Construction	Visible dust; condition of covers and roads; watering records; PM10 results; complaints and corrective actions	Daily visual checks; PM10 monthly during the first three months of earthworks, then quarterly if compliant; continue monthly following exceedances and increase monitoring where necessary	Contractor / Supervision Consultant
14	Exhaust emissions	Maintain vehicles and equipment in good condition, avoid unnecessary idling and plan deliveries efficiently. Inspect exhaust condition and repair poorly performing equipment. Implement the Traffic Management Plan to reduce unnecessary vehicle movements.	Construction	Maintenance records; visible exhaust emissions; idling practices; complaints	Daily visual checks; maintenance according to equipment requirements; monthly review	Contractor / Supervision Consultant
15	Noise and vibration	Implement the noise and vibration measures included in the C-ESMP. Schedule noisy works during daytime and obtain required authorisations for	Construction	Noise measurements at sensitive receptors; equipment condition; notifications;	Daily checks; noise measurements monthly for the first three months, then quarterly if compliant; continue	Contractor / Supervision Consultant

		evening or night work. Maintain equipment, use quieter methods and install movable barriers where needed. Notify nearby residents before particularly noisy works. Assess vibration risks near vulnerable structures and adjust methods where necessary. Investigate complaints promptly.		vibration-related damage reports; complaints	monthly following exceedances and increase monitoring in response to complaints or changes in work	
16	Construction traffic and access disruption	Prepare and implement a Traffic Management and Safety Plan in coordination with HATSU and relevant authorities. Phase works to maintain access to homes, businesses, schools and health services. Provide safe pedestrian routes, suitable temporary crossings, signs, lighting and flagpersons where needed. Establish traffic controls and secure working areas during excavation, pipe installation and road reinstatement. Maintain emergency vehicle access, control vehicle speeds and inform communities of diversions.	Planning and construction	Approved traffic arrangements; pedestrian access; signs and barriers; work area controls; traffic incidents; complaints; condition of affected roads	Before opening each work section; daily inspections; immediately after incidents; monthly review	Contractor, with HATSU coordination / Supervision Consultant
17	Biodiversity and ecosystem disturbance	Obtain and implement the Nature Conservation and National Parks opinion. Clearly mark work	Planning and construction	Official opinion; marked work areas; vegetation clearance	Before site clearance; daily checks near sensitive locations;	HATSU for the official opinion; Contractor for site

		areas, minimise vegetation clearance and protect watercourses. Avoid unnecessary tree removal, wildlife disturbance and access to undisturbed areas. If sensitive species or active nests are encountered, suspend the affected activity and obtain specialist advice. Clean equipment to limit invasive species transfer and reinstate disturbed areas using suitable native vegetation where required. Prepare additional biodiversity measures where findings require them.		and reinstatement records; wildlife observations; protection measures	during reinstatement; monthly review	measures / Supervision Consultant and İLBANK PIU
18	Labour and working conditions	Implement labour management procedures covering written employment terms, wages, working hours, rest, equal treatment and freedom of association. Prohibit child and forced labour. Maintain an accessible workers' grievance mechanism, including anonymous submissions without retaliation. Apply requirements to subcontractors. Where accommodation is provided, ensure safe housing, drinking	Planning and construction	Employment and age-verification records; payroll and working hours; worker grievances; accommodation inspections where applicable	At recruitment; monthly review; regular worker consultations and accommodation checks	Contractor / Supervision Consultant

		water, sanitation and welfare facilities.				
19	General occupational health and safety	Implement an OHS Management Plan and task-specific risk assessments. Provide induction, daily toolbox talks, suitable PPE, health surveillance and competent supervision. Use trained and authorised operators and inspect equipment before use. Apply permit-to-work procedures for high-risk activities. Provide safe working platforms, fall protection and falling-object controls wherever work at height is required. Establish exclusion zones for lifting and machinery operations. Apply electrical isolation and lockout procedures during electrical and automation works under the Reyhanlı component. Provide first aid, emergency arrangements and incident reporting.	Construction	Training and health records; PPE use; operator qualifications; equipment inspections; work permits; fall protection where required; lifting and machinery controls; electrical isolation records; incidents and corrective actions	Before work; daily inspections and briefings; continuous supervision during high-risk work; monthly performance review	Contractor / Supervision Consultant
20	Trench collapse, falls and underground utility strikes	Locate and verify existing utilities before excavation and coordinate with their operators. Assess ground conditions and excavation depth at each work section. Design and install	Planning and construction	Utility checks; excavation methods; support systems; barriers; safe access; excavation inspection records;	Before excavation; before each shift; after rain or changed conditions; continuous supervision during high-risk work	Contractor / Supervision Consultant

		suitable shoring, shielding or safe slopes, taking account of groundwater, nearby structures and traffic loads. Provide secure barriers and safe access. Keep spoil, vehicles and equipment at safe distances from excavation edges. Inspect excavations before each shift and after rain, ground movement or changes in conditions. Stop work and make the area safe if instability or damage to utilities is identified.		condition of nearby roads and structures		
21	Confined-space entry and hazardous atmospheres	Avoid entry into network chambers and other enclosed structures where work can be completed from outside. Where entry is necessary, use a confined-space permit, isolate electrical and mechanical equipment and control incoming flows. Test the atmosphere, provide ventilation, continuous monitoring where required, an attendant, communications and suitable rescue arrangements. Prohibit unplanned rescue entry.	Construction and commissioning	Entry permits; isolation checks; gas detector calibration and readings; ventilation; trained personnel; rescue equipment and drills	Before every entry and throughout entry operations	Contractor / Supervision Consultant
22	Community health and safety and	Implement community safety measures under the C-ESMP. Secure excavations and work areas, provide safe temporary	Planning and construction	Barriers and crossings; exclusion zones; utility coordination	Before each work section; daily inspections; immediately after	Contractor and HATSU within their responsibilities /

	utility disruption	crossings and inspect barriers and lighting. Prevent public access to machinery operating areas, lifting zones and electrical work areas. Coordinate planned utility interruptions and notify affected users in advance. Minimise the duration of water supply interruptions and arrange safe alternative drinking water supplies where necessary, particularly for vulnerable users and essential services.		records; advance notices; sensitive receptor checks; community incidents and grievances	incidents; monthly review	Supervision Consultant
23	Fire and emergency risks	Implement an Emergency Preparedness and Response Plan covering fire, spills, serious injury, flooding and earthquakes. Provide suitable extinguishers, clear escape routes, assembly points and emergency contacts. Control hot work and flammable material storage. Include temporary offices and worker accommodation where provided, and conduct drills.	Planning and construction	Emergency plan; equipment inspections; emergency access; worker training; drill and incident records	Before mobilisation; daily housekeeping checks; periodic equipment checks and drills; monthly review	Contractor / Supervision Consultant
24	Security-related impacts	Use trained security personnel and proportionate access controls. Apply the Code of Conduct and prohibit intimidation, harassment and excessive force. Keep	Construction	Security training; access arrangements; complaints and corrective actions	At appointment; ongoing supervision; monthly review and immediately following complaints	Contractor / Supervision Consultant

		community and worker grievance channels available for security-related concerns. Investigate complaints and implement corrective actions.				
25	Land use restrictions, property damage and livelihood impacts	Keep works within approved boundaries and maintain access to properties and businesses. Confirm formal and informal users before works. Avoid damage to structures, crops and other assets. Address verified losses in accordance with the Project RF. If land acquisition or physical or economic displacement becomes unavoidable, İLBANK PIU will prepare the required plan and HATSU will implement the relevant measures before displacement occurs.	Planning and construction	Land and user checks; access arrangements; damage and compensation records; grievances; approved plans where required	Before works at each section; daily access checks; immediately following damage or complaints; monthly review	HATSU and İLBANK PIU for land-related arrangements; Contractor for prevention and site controls / İLBANK PIU and Supervision Consultant
26	Cultural heritage and chance finds	Apply the Chance Finds Procedure in Annex 3 of the Project ESMF and train workers before excavation. If potential cultural heritage is found, stop work in the affected area, secure the location and immediately notify the resident engineer and the relevant museum directorate or competent local authority as	Planning and construction	Training records; chance find notifications; stop-work and clearance records; complaints	Before excavation; throughout earthworks; immediately following a discovery	Contractor, with HATSU coordination / Supervision Consultant and competent authority

		specified in the procedure. Promptly inform HATSU, the Supervision Consultant, PMC and İLBANK PIU. Resume affected works only following the required clearance and instructions. Protect access to cultural and religious places.				
27	Stakeholder engagement and grievances	Implement the Subproject SEP and maintain accessible community grievance channels. Inform residents and businesses in Reyhanlı and Kumlu about work locations, schedules, interruptions and access arrangements. Assign a community liaison contact. Provide suitable communication and assistance for vulnerable groups. Review and update the SEP at least every six months and following significant changes.	Planning and construction	Disclosure and consultation records; notices; liaison arrangements; grievance register; response times; SEP updates	Before works in each area; ongoing engagement; monthly review; SEP review at least every six months and following significant changes	HATSU and Contractor within their responsibilities / İLBANK PIU, supported by the PMC and Supervision Consultant
28	Water leakage, contamination and drinking water quality	Implement HATSU's inspection and preventive maintenance programme for the drinking water network, chambers and associated equipment. Detect and repair leaks, secure chamber covers and protect network access points against	Operation	Inspection and maintenance records; leakage and repair records; chamber and fitting condition; monitoring equipment checks;	According to the maintenance programme and applicable drinking water monitoring requirements; before commissioning and return to service	HATSU / HATSU's responsible E&S and operational staff, with İLBANK oversight under Project arrangements

		unauthorised access and contamination. Maintain water quality, pressure and flow monitoring equipment. Monitor drinking water quality in accordance with applicable requirements. Apply appropriate flushing, disinfection and water quality checks before commissioning and return to service following works that may affect water quality. Investigate suspected contamination and take corrective action promptly.		drinking water quality results; flushing and disinfection records; complaints and corrective actions	following relevant works; immediately following suspected contamination; monthly records review	
29	Operational worker safety and confined-space entry	Apply OHS procedures for pipeline repairs and maintenance of valves, chambers and associated equipment. Use trained workers, suitable PPE, hygiene facilities and health surveillance. Isolate and depressurise equipment before maintenance. Require confined-space permits, atmospheric testing, ventilation, an attendant and rescue arrangements where entry is necessary. Apply electrical isolation and lockout procedures during maintenance of electrical and automation installations in Reyhanlı. Provide	Operation	Risk assessments; entry permits; atmospheric testing, isolation and depressurisation records; training; health surveillance; equipment checks; fall protection and asbestos controls where required; incidents	Before each maintenance task and every confined-space entry; throughout entry operations; monthly review	HATSU / HATSU's responsible OHS and operational staff

		fall protection wherever work at height is required. Apply asbestos controls where maintenance may disturb existing asbestos-cement pipes.				
30	Water supply interruption, equipment failure and emergencies	Maintain the drinking water networks, monitoring instruments and associated equipment, including electrical and automation installations in Reyhanlı. Prepare response arrangements for equipment failure, power loss, pipe bursts, contamination, flooding and earthquakes. Isolate affected sections promptly, notify users and minimise service interruptions. Arrange safe alternative drinking water supplies where necessary, prioritising vulnerable users and essential services. Review recurring failures and implement corrective actions.	Operation	Maintenance and equipment checks; emergency arrangements; service interruption and failure records; user notifications; alternative supply arrangements; corrective actions	Routine operational checks; scheduled maintenance; immediately following faults and severe events; monthly review	HATSU / HATSU's responsible operational and E&S staff
31	Operational waste, cleaning discharges and hazardous materials	Collect pipeline and chamber cleaning residues, waste oils, electrical components and other maintenance waste separately. Manage flushing and disinfection water through an authorised discharge arrangement, with	Operation	Waste quantities and transfer records; storage conditions; cleaning and disinfection discharge arrangements;	During each cleaning or maintenance activity and waste transfer; before and during flushing or disinfection discharges; monthly review	HATSU / HATSU's responsible E&S and operational staff

		treatment or dechlorination where necessary. Apply appropriate asbestos waste controls where maintenance affects existing asbestos-cement pipes. Prevent spills and public exposure. Use secure storage and authorised collection, transport and disposal arrangements. Maintain waste records and prohibit uncontrolled discharges to drains or watercourses.		treatment records where required; asbestos waste records where applicable; spill records; receiving facility authorisations		
32	Noise and community disturbance during operation	Maintain mechanical and electrical equipment to minimise noise. Investigate complaints and undertake measurements where necessary. During maintenance, secure work areas and maintain pedestrian, property and emergency access. Inform affected users before planned interruptions and implement corrective measures promptly.	Operation	Equipment condition; noise results where required; access arrangements; interruption notices; complaints and response records	Routine inspections; during maintenance; before planned interruptions; following complaints; monthly review	HATSU / HATSU's responsible E&S and operational staff
33	Operational stakeholder engagement and worker protection	Maintain community and workers' grievance mechanisms, fair working conditions and the Code of Conduct. Continue relevant OHS and SEA/SH training. Provide accessible information on service interruptions and emergency	Operation	Grievance and response records; employment and training records; notices; incident reports; corrective actions	Ongoing; before planned interruptions; monthly review; immediately following significant incidents	HATSU / İLBANK PIU under Project monitoring arrangements

		contacts. Consider vulnerable users when planning maintenance and responding to complaints. Notify İLBANK PIU of significant incidents within 24 hours and provide the detailed investigation report within 15 days.				

4.2. List of Associated Plans and Procedures

The Contractor will prepare and implement the following plans before construction:

- Contractor's Environmental and Social Management Plan (C-ESMP);
- Occupational Health and Safety Management Plan;
- Emergency Preparedness and Response Plan;
- Traffic Management and Safety Plan;
- Waste Management Plan.

An Asbestos Management Plan will also be prepared and implemented before activities where asbestos-containing pipes or materials are expected to be disturbed.

Other measures and procedures required by the ESMP matrix will be incorporated into the relevant sections of these plans. The plans will also cover relevant works during the Defect Liability Period.

The plans will be reviewed at least every six months and updated following significant changes, incidents or monitoring findings.

5. CAPACITY DEVELOPMENT AND TRAINING

5.1. Organizational Capacity

İLBANK PIU, supported by the PMC, will oversee environmental and social management under the Project. HATSU will assign staff for local coordination, stakeholder engagement, grievance management and monitoring support, and will maintain adequate capacity for operation and maintenance.

The Contractor will provide qualified personnel and sufficient resources to implement the ESMP and C-ESMP, including environmental, social and occupational health and safety responsibilities. These arrangements will also cover subcontractors.

The Supervision Consultant will monitor the Contractor's compliance and follow up on corrective actions. Relevant organisations may obtain external specialist support where necessary. Staffing and resources will be maintained throughout their respective responsibilities under the Subproject.

5.2. Roles and Responsibilities

The key parties will implement their responsibilities in accordance with the Project ESMF and the protocol between İLBANK and HATSU.

İLBANK PIU: Holds overall responsibility for Project implementation and E&S oversight. It reviews and approves E&S documents, incorporates requirements into tender documents and contracts, monitors compliance and reports to the EIB.

Project Management Consultant (PMC): Supports the PIU with E&S document review, training, monitoring and reporting. It coordinates with the Supervision Consultant and follows up on corrective actions.

HATSU: Coordinates local implementation, ensures preparation of the Subproject E&S documents, supports permitting and stakeholder engagement, and implements the grievance mechanism. It carries out any required resettlement measures under plans prepared by the PIU and assumes responsibility for operation and maintenance after handover.

Supervision Consultant: Monitors construction and ESMP compliance daily, reviews the Contractor's plans and monitoring reports, identifies non-compliances and follows up on corrective actions. It reports its findings to İLBANK PIU through the PMC.

Contractor: Prepares and implements the C-ESMP and supporting plans, provides qualified staff and resources, trains workers and ensures subcontractor compliance. It maintains community and workers' grievance channels, submits monitoring reports and implements corrective actions.

During construction, the Contractor will submit quarterly E&S monitoring reports and monthly OHS forms to the Supervision Consultant. The Supervision Consultant will review the E&S reports, add its site inspection findings and forward them to the PMC. The PMC will consolidate the reports and submit them to İLBANK PIU quarterly. İLBANK PIU will submit consolidated E&S monitoring reports to the EIB every six months.

The Contractor will immediately report significant incidents to HATSU and the Supervision Consultant. HATSU will ensure that İLBANK PIU is notified within **24 hours of the incident**. The Contractor will prepare a detailed investigation report, including root cause analysis and corrective actions, for submission by HATSU to the PIU within **15 days of the incident**.

5.3. Capacity Building and Training

İLBANK PIU, supported by the PMC, will provide training and guidance to HATSU and the Supervision Consultant. The Supervision Consultant will train the Contractor, which will ensure that all workers, including subcontractor personnel, receive training relevant to their duties.

Training will cover:

- EIB requirements and implementation of the ESMP, C-ESMP and SEP;
- Dust, noise, waste, water pollution, spill prevention and asbestos awareness, including procedures for suspected asbestos-containing materials;
- Occupational and community safety, particularly excavation, confined-space entry, lifting operations, work at height, machinery and traffic, together with electrical and automation works under the Reyhanlı component;
- Emergency response, incident reporting and practical drills;
- Labour rights, the Code of Conduct, SEA/SH prevention and workers' grievances;
- Community relations, grievance handling and the Chance Finds Procedure;
- Protection of drinking water quality during pipeline connections, testing, flushing, disinfection and maintenance.

Initial training will be provided before relevant works begin. Refresher training will be conducted at least every six months and when activities or risks change. The Contractor will retain training and attendance records. The Supervision Consultant will check training coverage and identify additional needs.

6. STAKEHOLDER ENGAGEMENT AND GRIEVANCE MECHANISM

6.1. Stakeholder Engagement Approach

Stakeholder engagement for the Subproject will be carried out in accordance with the European Investment Bank (EIB) Environmental and Social Standards, the Project Environmental and Social Management Framework (ESMF), and the Stakeholder Engagement Plan (SEP) prepared for the overall Project.

The purpose of stakeholder engagement is to ensure that affected communities and other interested parties are informed about the Subproject, have opportunities to express their views and concerns, and can participate meaningfully in the management of potential environmental and social impacts.

HATSU will coordinate stakeholder engagement activities at the local level, supported by the Contractor and Construction Supervision Consultant during construction, under the overall oversight of İLBANK Project Implementation Unit (PIU).

Stakeholder engagement will continue throughout construction and operation, and additional consultations will be undertaken where significant concerns or unforeseen impacts arise.

6.2. Stakeholder Identification

Stakeholders will include individuals, groups and institutions that may be affected by or have an interest in the Subproject.

The main stakeholder groups are:

- **Project Affected Parties (PAPs):** Residents, land users, neighbouring communities and local businesses potentially affected by construction or operation.
- **Other Interested Parties (OIPs):** Relevant public institutions, HATSU, muhtars, civil society organisations and other interested parties.
- **Vulnerable and disadvantaged groups:** Individuals who may experience barriers to participation or disproportionate impacts, including older persons, persons with disabilities, low-income households and women facing social or economic barriers.
- **Project workers:** Contractor, subcontractor and supervision personnel engaged in Subproject activities.

Stakeholder identification will be reviewed during implementation to ensure that relevant groups are included in consultation activities.

6.3. Engagement with Vulnerable and Disadvantaged Groups

Particular attention will be given to vulnerable and disadvantaged individuals who may have difficulties accessing Subproject information, attending consultation meetings or submitting grievances. HATSU will cooperate with muhtars and relevant local institutions to identify these groups and assess their specific engagement needs.

Where necessary, targeted consultations, individual meetings and telephone interviews will be organised for stakeholders who cannot attend public meetings. Consultation venues and meeting times will be selected with consideration for accessibility, mobility limitations, working schedules and caregiving responsibilities. Separate or small-group meetings may be arranged to facilitate women's participation where appropriate.

Subproject information will be provided in clear and understandable language. Verbal explanations, simplified materials and language assistance will be made available where required. Vulnerable individuals will also be informed of available grievance channels and provided with assistance in submitting complaints when necessary.

6.4. Information Disclosure and Consultation

Relevant Subproject information, including the ESMP, anticipated environmental and social impacts, mitigation measures, construction schedule and grievance channels, will be disclosed through appropriate communication methods.

Information disclosure may include municipal websites, public notice boards, meetings with muhtars, printed information materials and direct communication with affected communities. Prior to construction, stakeholders will be informed of the planned works and potential temporary disturbances, including dust, noise, construction traffic and access restrictions.

During construction, additional information will be provided where activities may affect nearby communities. During operation, communication will focus on environmental and social concerns associated with the Subproject activities, particularly odour, noise and wastewater discharge. Stakeholder feedback will be recorded, evaluated and considered in the implementation of mitigation measures. Consultation records will include the date, participants, issues raised, responses provided and follow-up actions.

6.5. Institutional Responsibilities and Monitoring

HATSU will coordinate local stakeholder engagement and information disclosure activities. The Contractor will support community communication during construction and inform relevant stakeholders about activities likely to cause temporary disturbances. The Construction Supervision Consultant will monitor the Contractor's compliance with stakeholder engagement requirements. The Project Management Consultant (PMC) will support monitoring and reporting, while İLBANK PIU will oversee implementation of the applicable Project requirements.

Stakeholder engagement activities, concerns raised and follow-up actions will be documented and included in periodic environmental and social monitoring reports.

7. GRIEVANCE MECHANISM

7.1. General Principles

A Grievance Mechanism (GM) will be maintained throughout the construction and operation phases of the Subproject. The GM will provide an accessible and transparent process for receiving,

recording, assessing and resolving complaints, concerns and suggestions related to Subproject activities.

The mechanism will be available free of charge and will allow confidential and anonymous submissions. Complainants will be protected against discrimination, intimidation and retaliation.

Separate arrangements will be maintained for community grievances, workers' grievances and sensitive complaints, particularly those related to sexual exploitation and abuse and sexual harassment (SEA/SH).

The GM will not restrict access to administrative or judicial remedies available under national legislation.

7.2. Community Grievance Mechanism

The community GM will be available to affected communities and other stakeholders wishing to raise concerns regarding Subproject activities.

Complaints may relate to construction-related dust, noise, traffic, access restrictions, waste management, community health and safety, odour and other environmental or social issues.

HATSU will coordinate the community GM at the local level. The Contractor will be responsible for addressing construction-related complaints under the supervision of the Construction Supervision Consultant.

Stakeholders may also submit grievances directly to İLBANK through its established grievance channels.

7.2.1. Grievance Submission Channels

Grievances may be submitted verbally, in writing or anonymously through the channels presented below.

Grievance Submission Channels

Institution / Channel	Contact Information
HATSU – Telephone	+90 326 212 43 33 / Alo 185 (24/7 Call Center)
HATSU – E-mail	bilgi@hatsu.gov.tr
HATSU – Website / Online Contact	https://www.hatsu.gov.tr
HATSU – Written / In-person	Hatay Water and Sewerage Administration (HATSU) General Directorate, Kisecik Mahallesi, 2022. Sokak No: 2/2, Antakya/Hatay, Türkiye

İLBANK – Online Application	https://www.ilbank.gov.tr/form/bilgiedinmeuluslararasi
İLBANK – E-mail	uidbbilgi@ilbank.gov.tr
İLBANK – Telephone	+90 312 508 79 79
İLBANK – Written Application	İLBANK Department of Financial Institutions and Investor Relations, GM Team, Emniyet Mahallesi, Hipodrom Caddesi No: 9/21, Yenimahalle/Ankara, Türkiye
Construction Site – Verbal / Written	Contractor's designated Social Specialist and Construction Supervision Consultant
Construction Site – Grievance Boxes	Accessible locations to be designated before construction
Presidency Communication Center (CİMER)	https://www.cimer.gov.tr — Call Center: 150
Foreigners Communication Center (YİMER)	https://www.yimer.gov.tr — Call Center: 157

The Contractor will establish site-level grievance arrangements before construction and ensure that information on available channels is displayed at the construction site and communicated to affected communities.

Individuals with limited literacy, disabilities or other communication barriers will be provided with appropriate assistance to submit grievances.

7.2.2. Grievance Registration and Resolution

All grievances received through the designated channels will be registered and managed through a documented procedure. The responsible personnel will acknowledge receipt of the grievance, assess its nature and urgency, and refer it to the relevant party for investigation.

Construction-related complaints will be investigated by the Contractor under the supervision of the Construction Supervision Consultant. Appropriate corrective measures will be implemented, and the complainant will be informed of the outcome where contact information is available.

Grievances will be closed following completion and documentation of the necessary actions. Unresolved complaints may be escalated to HATSU and İLBANK for further review.

Acknowledgement and resolution periods will follow the applicable Project grievance management procedures. Complaints involving immediate risks to health, safety or the environment will be addressed without delay.

7.3. Workers' Grievance Mechanism

In addition to the community GM, the Contractor and Construction Supervision Consultant will establish separate Workers' Grievance Mechanisms (WGMs) in accordance with the applicable EIB Environmental and Social Standards, the Project ESMF and national labour legislation.

The WGM will be accessible to all workers engaged in the Subproject, including subcontractor and temporary workers. It will allow workers to raise concerns regarding employment conditions, wages, working hours, occupational health and safety, discrimination, harassment and other workplace-related matters.

Workers will be informed of the grievance procedures and available reporting channels during induction training. Grievances may be submitted verbally or in writing through designated personnel, telephone, e-mail or grievance boxes. Anonymous submissions will be accepted, and workers' identities will be kept confidential upon request.

The Contractor and Construction Supervision Consultant will designate personnel responsible for receiving, recording and addressing workers' grievances. Worker grievances will be registered and monitored separately from community grievances.

Workers will be protected against dismissal, discrimination, intimidation or any loss of employment rights resulting from the use of the WGM. Where a grievance cannot be resolved at the employer level, workers may refer the matter to HATSU or İLBANK.

The implementation of the WGM will be monitored by the Construction Supervision Consultant and HATSU, under the overall oversight of İLBANK PIU. Workers will retain their right to access administrative and judicial remedies under national legislation.

7.4. Sensitive and Confidential Grievances (SEA/SH)

Although the SEA/SH risk from the subproject activities is low, the GM will include confidential channels for receiving and managing SEA/SH grievances in accordance with the SEA/SH requirements of applicable EIB Environmental and Social Standards and national legislation. The GM will manage SEA/SH grievances through a safe, confidential and survivor-centered process. The GM will ensure that SEA/SH grievances are handled in a timely manner while respecting informed consent, confidentiality, survivor safety and dignity, protection against retaliation, and applicable data protection requirements.

Survivors will be informed about the available support services, mandatory reporting obligations under Turkish legislation, and the operation and limitations of the SEA/SH Grievance Mechanism in a clear and understandable manner. Referrals to appropriate medical, psychosocial, legal or protection services will be made in accordance with the survivor's wishes and legal requirements.

The Contractor and subcontractors will implement a Code of Conduct prohibiting SEA/SH, discrimination, harassment and retaliation. Workers will receive training on prohibited behaviour, confidential reporting channels and the procedures for responding to sensitive complaints.

SEA/SH-related grievances may be submitted through the available Subproject grievance channels, including İLBANK, HATSU and designated site-level personnel. Anonymous and confidential submissions will be accepted.

Personnel receiving a SEA/SH complaint will not investigate the allegation or request unnecessary details. The complaint will be referred promptly and confidentially to the designated İLBANK SEA/SH Case Focal Point.

Annex A – E&S Incident Notification Form Template

1) Incident Details		
Date of Incident: [*Please indicate*]	**Time of Incident:** [*Please indicate*]	
Location of the Incident:	[*Please indicate*]	
Full Name of Sub-borrower:	[*Please indicate*]	
Date Reported to İLBANK: [*Please indicate*]	Reported to İLBANK by: [*Please indicate]*	Notification Type: [*Please indicate; e-mail/phone call/media notice/other]*
Date Reported to EIB: [*Please indicate*]	Reported to EIB by: [*Please indicate]*	Notification Type: [*Please indicate; e-mail/phone call/media notice/other]*
Full Name of the Contractor of the Subproject:	[*Please indicate]*	
Full Name of the Sub-contractor involved in the incident:	[*Please indicate]*	

2) Type of incident (please check all that apply)[1]	
☐ Fatality	☐ Acts of violence/protest
☐ Lost time injury	☐ Unexpected impacts on heritage resources
☐ Displacement without due process	☐ Unexpected impacts on biodiversity resources
☐ Child labor	☐ Environmental pollution incident
☐ Forced labor	☐ Dam failure
☐ Disease outbreaks	☐ Other

3) Description/Narrative of Incident
For example: I. What is the incident? [*Please briefly describe*]

[1] See Appendix 2 for definitions.

II. What were the conditions or circumstances under which the incident occurred (if known)? [*Please briefly describe*]

III. Are the basic facts of the incident clear and uncontested, or are there conflicting versions? What are those versions? [*Please briefly describe*]

IV. Is the incident still ongoing or is it contained? [*Please briefly describe*]

V. Have any relevant authorities been informed? [*Please briefly describe*]

4) Actions taken to contain the incident

Short Description of Action	Responsible Party	Expected Date	Status

For incidents involving a Contractor:

Name of Contractor:

Have the works been suspended? Yes ☐ No ☐
Note: Please attach a copy of the instruction suspending the works

5) What support has been provided to affected people

[*Please briefly describe*]

APPENDICES

Appendix 1: Supporting documents

[Note: Please mark the relevant documents available at this stage and submit them attached to the report]:

☐ Copy of the social security registration records of the victims and involved persons

☐ Copy of the instruction suspending the works

☐ Statement of victims

☐ Statement of witnesses

☐ Copies of notifications done to the relevant authorities

☐ Copies of legal investigation reports of relevant authorities

☐ Copies of E&S training records of the affected and involved persons

☐ Copies of OHS training records of the affected and involved persons

☐ Photographs related to the incident

☐ Others

Appendix 2: Incident Types

The following are incident types to be reported using the environmental and social (E&S) incident response process:

Fatality: Death of a person(s) that occurs within one year of an accident/incident, including from occupational disease/illness (e.g., from exposure to chemicals/toxins).

Lost Time Injury: Injury or occupational disease/illness (e.g., from exposure to chemicals/toxins) that results in a worker requiring 3 or more days off work, or an injury or release of substance (e.g., chemicals/toxins) that results in a member of the community needing medical treatment.

Acts of Violence/Protest: Any intentional use of physical force, threatened or actual, against oneself, another person, or against a group or community, that either results in or has a high likelihood of resulting in injury, death, psychological harm, deprivation to workers or project beneficiaries, or negatively affects the safe operation of a project worksite.

Disease Outbreaks: The occurrence of a disease in excess of normal expectancy of number of cases. Disease may be communicable or may be the result of unknown etiology.

Displacement Without Due Process: The permanent or temporary displacement against the will of individuals, families, and/or communities from the homes and/or land which they occupy without the provision of, and access to, appropriate forms of legal and other protection and/or in a manner that does not comply with an approved resettlement action plan.

Child Labor: An incident of child labor occurs: (i) when a child under the age of 14 (or a higher age for employment specified by national law) is employed or engaged in connection with a project, and/or (ii) when a child over the minimum age specified in (i) and under the age of 18 is employed or engaged in connection with a project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral or social development.

Forced Labor: An incident of forced labor occurs when any work or service not voluntarily performed is exacted from an individual under threat of force or penalty in connection with a project, including any kind of involuntary or compulsory labor, such as indentured labor, bonded labor, or similar labor-contracting arrangements. This also includes incidents when trafficked persons are employed in connection with a project.

Unexpected Impacts on heritage resources: An impact that occurs to a legally protected and/or internationally recognized area of cultural heritage or archaeological value, including world heritage sites or nationally protected areas not foreseen or predicted as part of project design or the environmental or social assessment.

Unexpected impacts on biodiversity resources: An impact that occurs to a legally protected and/or internationally recognized area of high biodiversity value, to a Critical Habitat, or to a Critically Endangered or Endangered species (as listed in IUCN Red List of threatened species or equivalent national approaches) that was not foreseen or predicted as part of the project design or the environmental and social assessment. This includes poaching or trafficking of Critically Endangered or Endangered species.

Environmental pollution incident: Exceedances of emission standards to land, water, or air (e.g., from chemicals/toxins) that have persisted for more than 24 hours or have resulted in harm to the environment.

Dam failure: A sudden, rapid, and uncontrolled release of impounded water or material through overtopping or breakthrough of dam structures.

Other: Any other incident or accident that may have a significant adverse effect on the environment, the affected communities, the public, or the workers, irrespective of whether harm had occurred on that occasion. Any repeated non-compliance or recurrent minor incidents which suggest systematic failures that the task team deems needing the attention of Bank management.

Annex B – E&S Incident Investigation Form Template

1) Investigation Findings
For example: I. where and when the incident took place, II. who was involved, and how many people/households were affected, III. what happened and what conditions and actions influenced the incident, IV. what were the expected working procedures and were they followed, V. did the organization or arrangement of the work influence the incident, VI. were there adequate training/competent persons for the job, and was necessary and suitable equipment available, VII. what were the underlying causes; where there any absent risk control measures or any system failures.

2) Corrective Actions from the investigation to be implemented (to be fully described in Corrective Action Plan)		
Action	Responsible Party	Expected Date

3a) Fatality/Lost Time Injury Information	
Fatality ☐	Lost time injury ☐
Immediate cause of fatality/injury for worker or member of the public (please check all that apply) [2]:	
☐ Caught in or between objects	☐ Medical Issue
☐ Struck by falling objects	☐ Suicide
☐ Stepping on, striking against, or struck by objects	☐ Project Vehicle Work Travel
☐ Drowning	☐ Non-project Vehicle Work Travel
☐ Chemical, biochemical, material exposure	☐ Project Vehicle Commuting
☐ Falls, trips, slips	☐ Non-project Vehicle Commuting
☐ Fire & explosion	☐ Vehicle Traffic Accident (Members of Public Only)
☐ Electrocution	☐ Other
☐ Homicide	

[2] See Appendix 1 for definitions

Name	Age/ Date of Birth	Nationality	Gender	Date of Fatality/ Injury	Cause of Fatality/ Injury	Affected Party (Employee/ Public)
			☐ Female ☐ Male			☐ Sub-borrower employee ☐ Contractor employee ☐ Sub-contractor employee ☐ Public

3b) Financial Support/Compensation Types (to be fully described in Corrective Action Plan template – template is given in Appendix 3)

☐ No Compensation Required

☐ Workman's Compensation/National Insurance

☐ Contractor Direct

☐ Contractor Insurance

☐ Other

☐ Court Determined Judicial Process

Name	Compensation Type	Compensation Amount (TRY)	Responsible Party

4) Supplementary Narrative

Appendix 1: Definition of fatality/injury immediate causes

1. **Caught in or between objects:** caught in an object; caught between a stationary object and moving object; caught between moving objects (except flying or falling objects).

2. Struck by falling objects: slides and cave-ins (earth, rocks, stones, snow, etc.); collapse (buildings, walls, scaffolds, ladders, etc.); struck by falling objects during handling; struck by falling objects.

3. Stepping on, striking against, or struck by objects: stepping on objects; striking against stationary objects (except impacts due to a previous fall); Striking against moving objects; Struck by moving objects (including flying fragments and particles) excluding falling objects.

4. Drowning: respiratory impartment from submersion/emersion in liquid.

5. Chemical, biochemical, material exposure: exposure to or contact with harmful substances or radiations.

6. Falls, trips, slips: falls of persons from heights (e.g., trees, buildings, scaffolds, ladders, etc.) and into depths (e.g., wells, ditches, excavations, holes, etc.) or falls of persons on the same level.

7. Fire & explosion: exposure to or contact with fires or explosions.

8. Electrocution: exposure to or contact with electric current.

9. Homicide: a killing of one human being by another.

10. Medical Issue: a bodily disorder or chronic disease.

11. Suicide: the act or an instance of taking, or attempting to take, one's own life voluntarily and intentionally.

12. Others: any other cause that resulted in a fatality or injury to workers or members of the public.

Vehicle Traffic

13. Project Vehicle Work Travel: traffic accidents in which project workers, using project vehicles, are involved during working hours and which occur in the course of paid work.

14. Non-project Vehicle Work Travel: traffic accidents in which project workers, using non-project vehicles, are involved during working hours and which occur in the course of paid work.

15. Project Vehicle Commuting: traffic accidents in which project workers, using project vehicles, are involved while travelling to (i) the worker's principal or secondary residence; (ii) the place where the worker usually takes his or her meals; or (iii) the place where he or she usually receives his or her remuneration.

16. Non-project Vehicle Commuting: traffic accidents in which project workers, using non-project vehicles, are involved while travelling to (i) the worker's principal or secondary residence; (ii) the place where the worker usually takes his or her meals; or (iii) the place where he or she usually receives his or her remuneration.

17. Vehicle Traffic Accident (Members of Public Only): traffic accidents in which non-project workers/members of the public are involved in an accident while travelling for any purpose.

Appendix 2: Supporting documents

[Note: Please mark the relevant documents available and submit them attached to the report]:

☐ Copy of the social security registration records of the victims and involved persons

☐ Copy of the instruction suspending the works

☐ Statement of victims

☐ Statement of witnesses

☐ Copies of notifications done to the relevant authorities

☐ Copies of legal investigation reports of relevant authorities

☐ Copies of E&S training records of the affected and involved persons

☐ Copies of OHS training records of the affected and involved persons (such as basic OHS training, induction training, visitors training, job-specific training, refreshment training, etc.)

☐ Photographs related to the incident

☐ Health examination records of the affected and involved employees

☐ Copies of Personal Protective Equipment delivery forms (signed copies)

☐ Root Cause Analysis completed for the incident

☐ Information/documentation related to any judicial process

☐ Others

Appendix 3: Corrective Action Plan template

Action No:	Brief Description of E&S non-compliance	Corrective Action	Financial and Human Resources Required	Responsible Party	Due Date for Completion of Corrective Action	Indicators for Successful Completion of Corrective Action	Status of Corrective Action

Annex C – Chance Finds Procedure[3]

Cultural heritage encompasses tangible and intangible heritage which may be recognized and valued at a local, regional, national or global level. Tangible cultural heritage, which includes movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Tangible cultural heritage may be located in urban or rural settings, and may be above or below land or under the water. Intangible cultural heritage, which includes practices, representations, expressions, knowledge, skills—as well as the instruments, objects, artefacts and cultural spaces associated therewith—that communities and groups recognize as part of their cultural heritage, as transmitted from generation to generation and constantly recreated by them in response to their environment, their interaction with nature and their history.

In the event that during construction, sites, resources or artefacts of cultural value are found, the following procedures for identification, protection from theft, and treatment of discovered artefacts should be followed and included in standard bidding documents. These procedures consider requirements related to Chance Finding under national legislation including **Protection of Cultural and Natural Assets Law (Nº 2863)**.

- Stop the construction activities in the area of chance find temporarily.
- Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a guard shall be arranged until the responsible local authorities take over. These authorities are **nearest museum directorate** or **mukhtar in the village**, and **local authority i.e. governor or district governor in other places**.
- Notify the relevant **resident engineer** and the **nearest museum directorate** or the **mukhtar in the village**, and the **local authority in other places** immediately. **Resident engineer** will inform the **Project Manager** of the contractor. Subsequently, the **Project Manager** will inform the **PIU**, the **supervision consultant**, and **the project management consultant**, promptly.
- The **mukhtar in the village**, and the **local authority in other places** shall promptly carry out the necessities. The mukhtar shall report the situation to the nearest local

[3] This procedure is based on Annex 3 of the Environmental and Social Management Framework (ESMF) for the Earthquake Reconstruction Framework Loan. It will be applied if previously unknown cultural heritage is encountered during Subproject activities.

authority along with the measures taken on the same day. The local authority and other authorities notify the Ministry of Culture and Tourism (MoCT) and the nearest museum directorate in writing within ten days.

- The **MoCT** and the **nearest museum directorate** would be in charge of evaluation/inspection of the significance or importance of the chance finds and advise on appropriate subsequent procedures.
- If the **MoCT** and the **nearest museum directorate** determines that chance finds is a non-cultural heritage chance find, the construction process can resume.
- If the **MoCT** and the **nearest museum directorate** determines chance finds is an isolated chance finds, **MoCT** and the **nearest museum directorate** would provide technical supports/advice on chance finds treatment with related expenditure on the treatment provided by the entity report the chance finds.

Annex D – Change Notification Form

Change Notification Form	
Subproject Name	
Subproject Location	
Subproject Phase	☐ Pre-construction
	☐ Construction
	☐ Operation
Name of the Institution Notifying the Change	
Date	
Category of the Change (please select all that apply)	☐ Legislative Change
	☐ Design Change
	☐ Schedule Change due to E&S factors
	☐ Project Schedule Changes due to technical, financial, legal or administrative factors
	☐ Changes due to E&S issues encountered at Subproject implementation
	☐ Contractor or Construction Supervision Consultant Change
	☐ Other (please specify below)
Detailed Description of the Change(s)	

Change Notification Form	
Documents Submitted with Change Notification Form	
Name of the Staff Notifying the Change	
Position of the Staff Notifying the Change	
Signature	