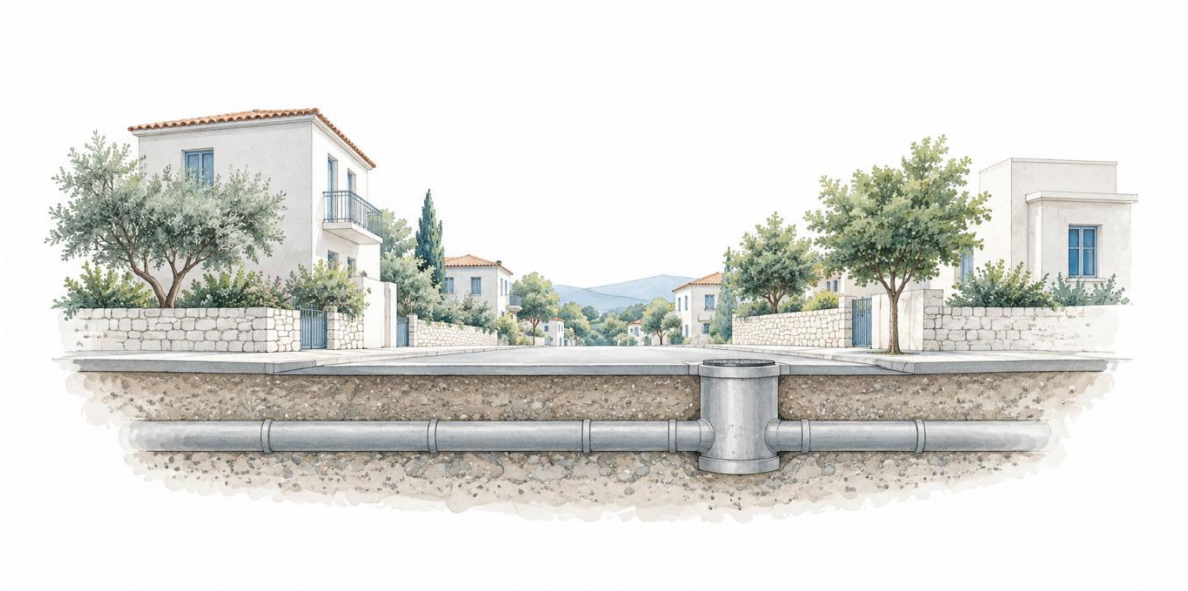
European Investment Bank

İLBANK
TÜRKİYE'NİN YAPICI GÜCÜ

EARTHQUAKE RECONSTRUCTION FRAMEWORK LOAN



ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (ESMP)

Construction of Samandağ Tekebaşı Group Sewerage Network of Hatay Metropolitan Municipality General Directorate of Water and Sewerage Administration (HATSU)

October 27, 2026

HATAY BÜYÜKŞEHİR BELEDİYESİ 1939

HATSU
T.C. HATAY BÜYÜKŞEHİR BELEDİYESİ
SU VE KANALİZASYON İDARESİ GENEL MÜDÜRLÜĞÜ

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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 Construction of Samandağ Tekebaşı Group Sewerage Network. The Subproject is financed under the European Investment Bank's Earthquake Reconstruction Framework Loan, with İLBANK acting as the Project Promoter. It aims to improve wastewater collection services in Tekebaşı, Sutaşı, Çöğürlü and Meydan neighbourhoods of Samandağ District, Hatay Province.

The Subproject includes approximately 82 km of gravity sewers, 4.82 km of pumping mains, five package pumping stations, household connections, manholes and stream-crossing structures. The total design wastewater flow is 138.5 L/s, including flows from an additional catchment. Construction is expected to take approximately 18-24 months, subject to the confirmed contract schedule. HATSU will operate and maintain the completed infrastructure.

Works are planned along existing public roads owned by Hatay Metropolitan Municipality, and no additional land acquisition is currently anticipated. Temporary access restrictions, disruption to businesses and services, and potential impacts on formal or informal users will be checked before works begin. Access will be maintained wherever practicable, and any displacement-related impacts will be addressed under the Project Resettlement Framework.

The Hatay Provincial Directorate of Environment, Urbanisation and Climate Change has confirmed that the sewerage project falls outside the scope of the national EIA Regulation through Letter No. E-26634441-220.03-8353667. Compliance with other applicable legislation and permitting requirements remains necessary. An official opinion will be obtained from the relevant Directorate of Nature Conservation and National Parks, and its requirements will be incorporated into the ESMP.

The main construction risks concern excavation and trench stability, groundwater and dewatering, confined-space entry, machinery, traffic, dust, noise, waste and water pollution. Community access, labour conditions, vulnerable groups and chance finds also require attention. During operation, the principal risks relate to blockages, leakage, overflows, pump failures and maintenance safety. The ESMP matrix establishes mitigation measures, monitoring indicators, frequencies and responsibilities for these risks.

İLBANK PIU will oversee ESMP implementation, supported by the Project Management Consultant. The Supervision Consultant will monitor construction compliance, and the Contractor will implement the C-ESMP and supporting safety, emergency, traffic and waste management arrangements. HATSU will coordinate local activities and assume operational responsibilities. Training, stakeholder engagement and accessible community and workers' grievance mechanisms will support implementation. Significant incidents will be notified to İLBANK PIU within 24 hours, followed by a detailed investigation report 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 Construction of Samandağ Tekebaşı Group Sewerage Network (hereinafter referred to as the "Subproject"), located in Samandağ District, Hatay Province. The Subproject aims to improve wastewater collection services in the Tekebaşı Group service area and support the restoration of municipal infrastructure following the earthquakes.

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;
- **EU Urban Waste Water Treatment Directive (91/271/EEC),** as referenced in the Project ESMF, taking account of the relevant provisions and transition arrangements of its recast, Directive (EU) 2024/3019;
- 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 sewerage network 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, wastewater leakage and pollution 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 and extreme rainfall, need to be considered in the design and operation of the sewerage network. Opportunities to minimise energy consumption and greenhouse gas emissions from construction equipment, transport and pumping facilities 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, exposure to wastewater, 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 sewerage network.
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 water and soil pollution, waste management, excavation and construction waste, air emissions, environmental noise, environmental permits, occupational risk assessment, construction safety, 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

İLBANK 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. Each party will provide adequate staff and resources for its responsibilities.

HATSU 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 Subproject involves the construction and operation of a sewerage network serving Tekebaşı, Sutaşı, Çöğürlü and Meydan neighbourhoods in Samandağ District, Hatay Province. It includes gravity sewers, pumping mains, five package pumping stations, manholes and household connections. HATSU will operate and maintain the completed infrastructure.

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
Sewerage network	Separate wastewater collection system, excluding stormwater. Approximately **82 km** of gravity sewers, with diameters of **300–800 mm**, using concrete and reinforced concrete pipes with integrated gaskets.
Pumping mains	Approximately **4.82 km** of polyethylene pressure pipes, with diameters of **125–355 mm**, specified as **PE100 PN10**.
Pumping stations	**Five package pumping stations (TM1–TM5)** installed within shafts/manholes, with associated electrical and automation equipment. These convey wastewater where gravity flow is not possible.
Household connections and other structures	**150 mm concrete connection pipes**, property connection chambers, inspection manholes and stream-crossing structures.
Design wastewater flow	**138.5 L/s**, including **48 L/s** from the additional catchment serving Kuşalanı and Koyunluoğlu neighbourhoods.
Design horizon	**2059**, as adopted in the feasibility study.
Wastewater treatment	WWTP construction is outside the Subproject scope. The feasibility study envisages connection to a separately planned wastewater treatment plant.

2.2.Subproject Location

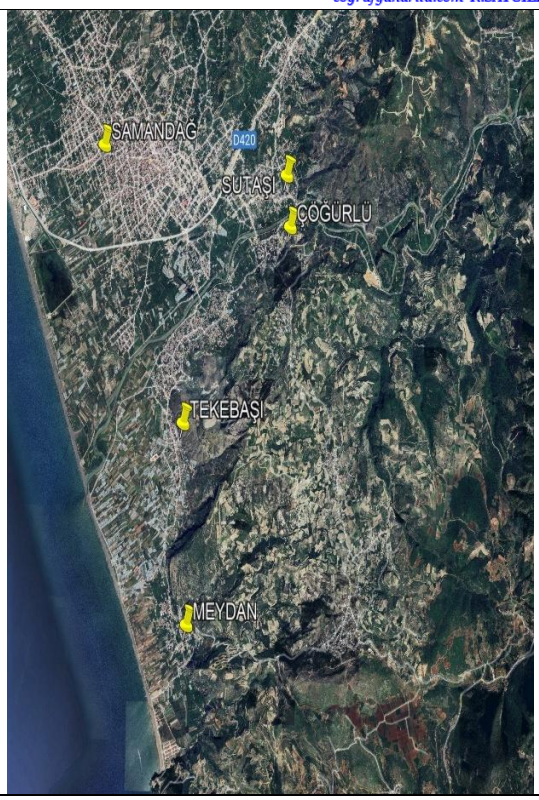
The Subproject is located in Tekebaşı, Sutaşı, Çöğürlü and Meydan neighbourhoods of Samandağ District, Hatay Province. Works are planned along existing public roads owned by Hatay Metropolitan Municipality. No additional land acquisition is anticipated.

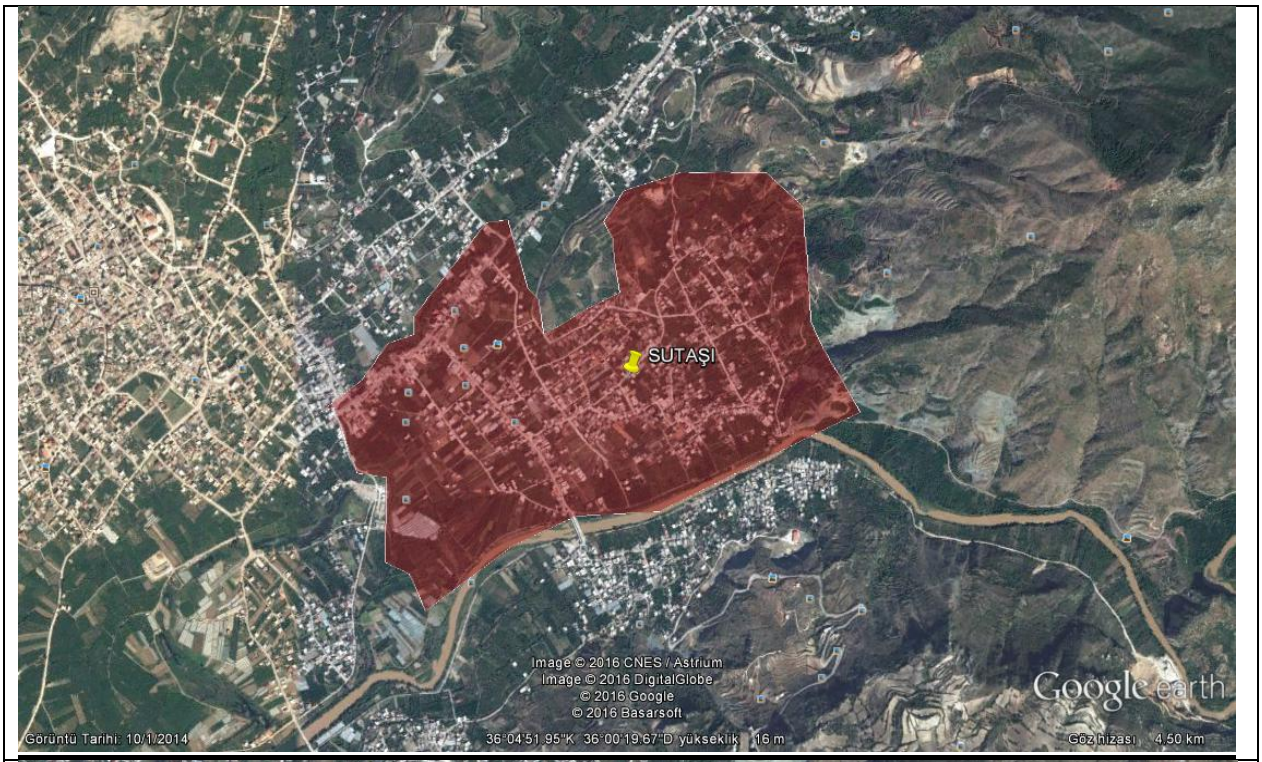


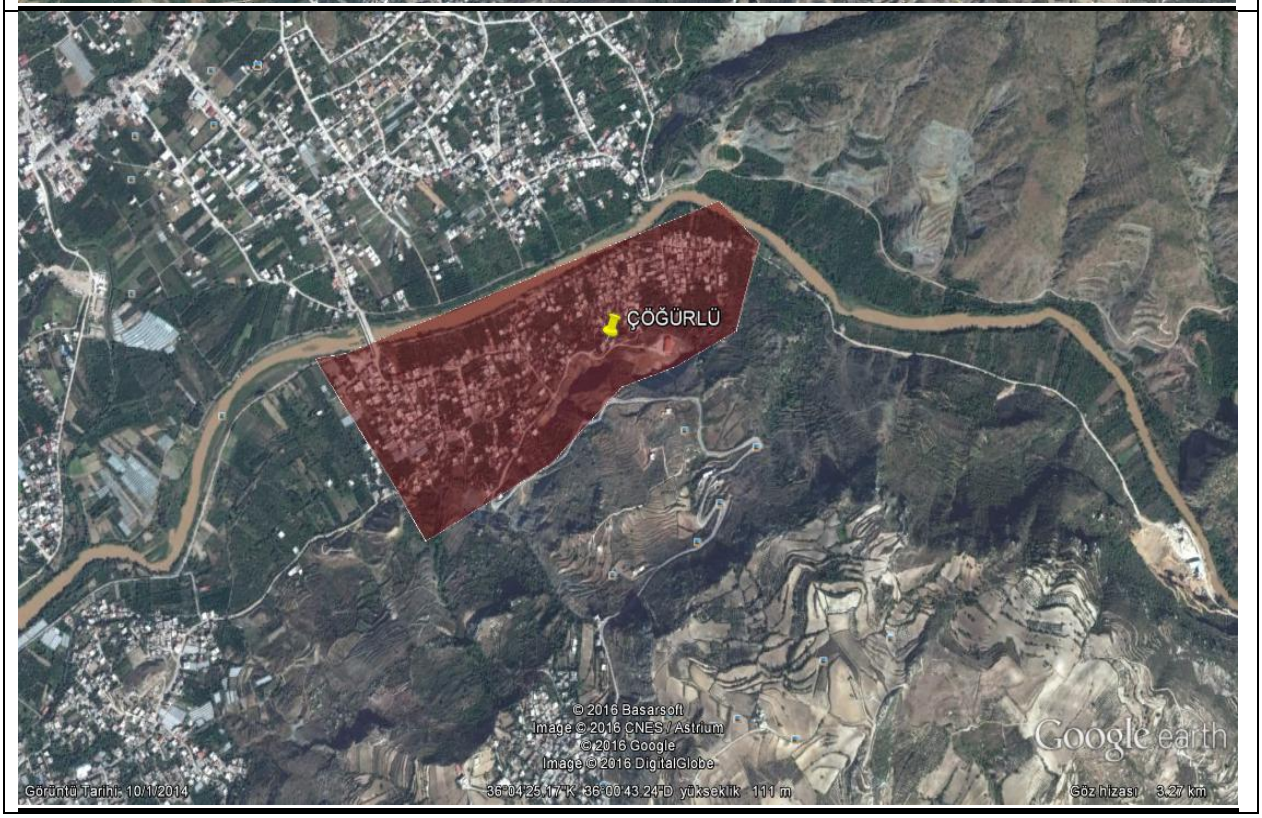
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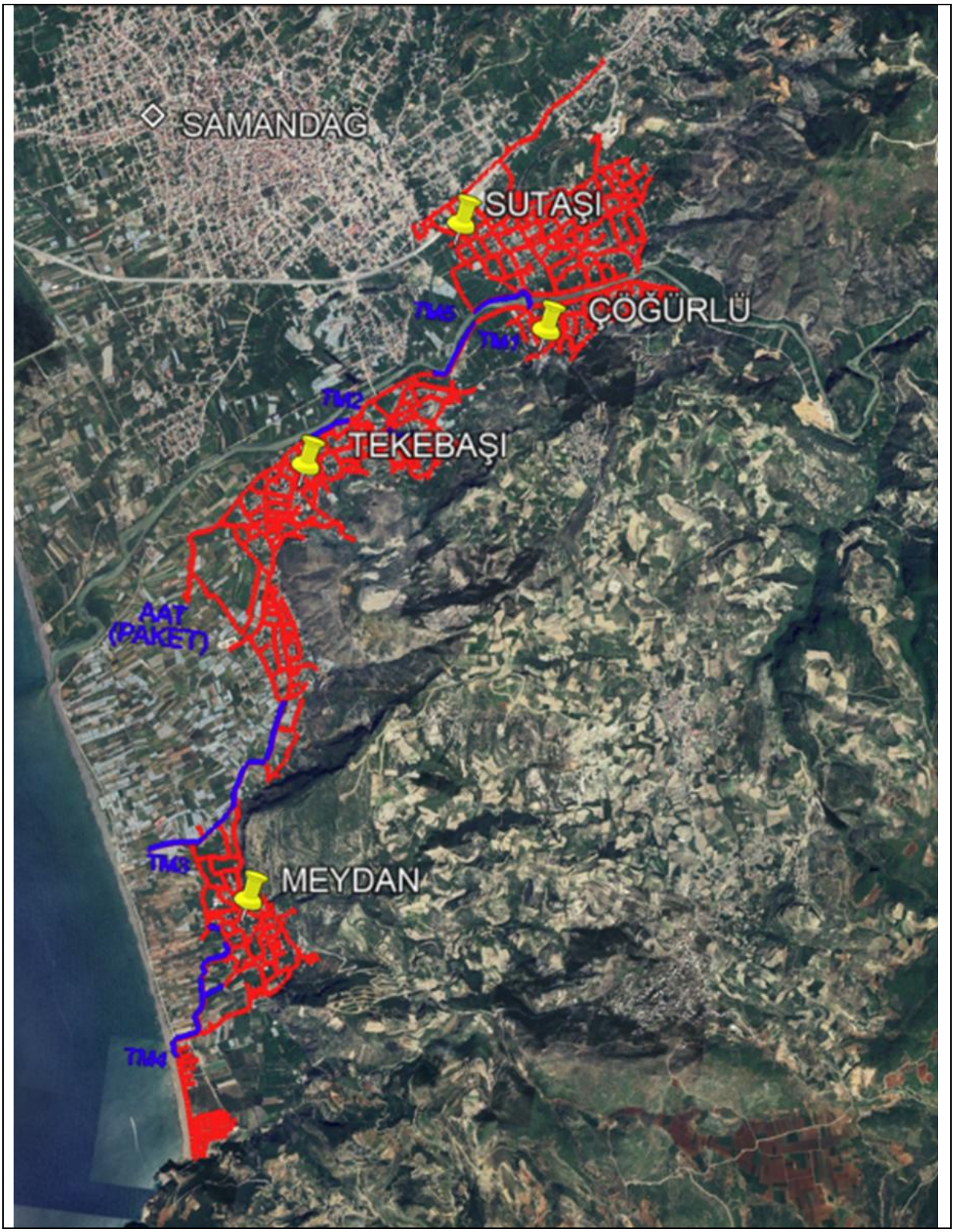





SÜTAŞI
Image © 2016 CNES / Astrium
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© 2016 Basarsoft
Görüntü Tarihi: 10/1/2014
36°04'51.95"K 36°00'19.67"D yükseklik 16 m
Göz hizası 4.50 km
Google earth


ÇÖĞÜRLÜ
© 2016 Basarsoft
Image © 2016 CNES / Astrium
© 2016 Google
Image © 2016 DigitalGlobe
Görüntü Tarihi: 10/1/2014
36°04'25.17"K 36°00'43.24"D yükseklik 111 m
Göz hizası 3.27 km
Google earth


TEKEBAŞI
Image © 2016 DigitalGlobe
Image © 2016 CNES / Astrium
© 2016 Google
© 2016 Basarsoft
Görüntü Tarihi: 4/6/2014
36°03'20.90"K 35°59'12.16"D yükseklik 67 m
Göz hizası 4.41 km
Google earth
MEYDAN
Image © 2016 CNES / Astrium
Image © 2016 DigitalGlobe
© 2016 Google
Data SIO, NOAA, U.S. Navy, NGA, GEBCO
Görüntü Tarihi: 10/1/2014
36°01'16.02"K 35°59'03.57"D yükseklik 6 m
Göz hizası 5.61 km
Google earth


SAMANDAĞ
SUTAŞI
ÇÖĞÜRLÜ
TM5
TM1
TM2
TEKEBAŞI
AAT
(PAKET)
TM3
MEYDAN
TM4

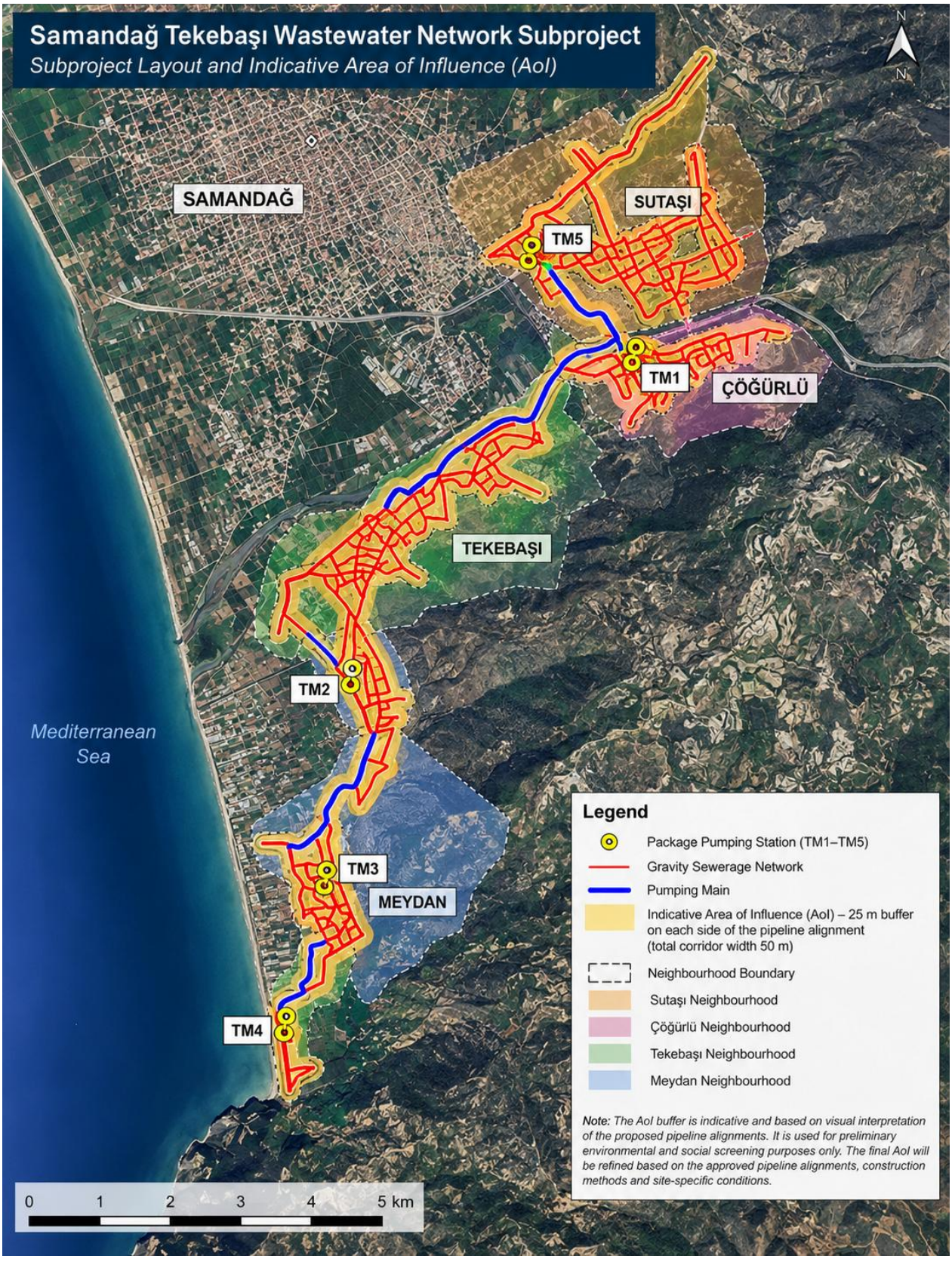
2.3. Subproject Impact Area

The Subproject's Area of Influence (AoI) includes the sewerage network routes, five pumping station locations (TM1–TM5), temporary construction areas, and nearby residential, commercial, agricultural and public-use areas in Tekebaşı, Sutaşı, Çöğürlü and Meydan neighbourhoods.

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 and temporary restrictions on access to properties and businesses.

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

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


Samandağ Tekebaşı Wastewater Network Subproject
Subproject Layout and Indicative Area of Influence (AoI)
N
SAMANDAĞ
SUTAŞI
TM5
TM1
ÇÖĞÜRLÜ
TEKEBAŞI
TM2
Mediterranean Sea
TM3
MEYDAN
TM4
Legend
Package Pumping Station (TM1–TM5)
Gravity Sewerage Network
Pumping Main
Indicative Area of Influence (AoI) – 25 m buffer on each side of the pipeline alignment (total corridor width 50 m)
Neighbourhood Boundary
Sutaşı Neighbourhood
Çöğürlü Neighbourhood
Tekebaşı Neighbourhood
Meydan Neighbourhood
Note: The AoI buffer is indicative and based on visual interpretation of the proposed pipeline alignments. It is used for preliminary environmental and social screening purposes only. The final AoI will be refined based on the approved pipeline alignments, construction methods and site-specific conditions.
0 1 2 3 4 5 km

2.4. Environmental and Social Baseline

The environmental and social baseline has been characterised through a desk review of the Tekebaşı Wastewater Network Project Identification Document (December 2024) and supporting project information. Sources include population statistics, descriptions of existing infrastructure, climate and geological information, and findings from previous geotechnical investigations. These existing studies provide information on local conditions relevant to the assessment of the Subproject's environmental and social risks and impacts.

2.4.1. Physical Environment

The Subproject follows existing roads in the Samandağ area, where local terrain requires both gravity sewers and pumping stations. Geotechnical investigations undertaken in 2017 identified clay, silt, sand and gravel, with groundwater encountered at several investigation points. These findings are relevant to excavation support and dewatering.

The area lies within the **Asi River Basin** and has a Mediterranean climate, with hot, dry summers and mild, rainy winters. Flooding has been reported in the wider area, including overflow of the Asi River. Hatay is also highly seismically active and was severely affected by the February 2023 earthquakes. These conditions require consideration in infrastructure design and construction planning.

Project-specific baseline air quality and noise measurements are not available in the reviewed documents. Detailed information on topography, geology, climate, seismicity and ground conditions is provided in **Sections 2.3 and 5.7 of the Tekebaşı Wastewater Network Project Identification Document (December 2024)**.

2.4.2. Biodiversity

The Subproject mainly follows existing roads within settled areas. The feasibility study provides general information on regional vegetation but does 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 Samandağ District and the four neighbourhoods covered by the Tekebaşı Sewerage Network Subproject: Tekebaşı, Sutaşı, Çöğürlü and Meydan. 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 Tekebaşı Sewerage Network Subproject is located in Samandağ District of Hatay Province and covers four neighbourhoods: Tekebaşı, Sutaşı, Çöğürlü and Meydan.

According to the 2025 population figures reported for Samandağ, the district has a total population of 122,952. The population figures for the four Subproject neighbourhoods are presented in Table below.

Table . Population of the Subproject Neighbourhoods (2025)

Neighbourhood	Population
Tekebaşı	8,504
Sutaşı	6,438
Çöğürlü	3,550
Meydan	2,932
Total	**21,424**

Source: Published 2025 ADNKS-based population data. Neighbourhood figures are subject to confirmation against the official TurkStat records.

Tekebaşı has the largest population among the four neighbourhoods, followed by Sutaşı, Çöğürlü and Meydan.

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.

2.4.3.1. Land Ownership Status and Land Use by Affected People

The Tekebaşı Sewerage Network Subproject covers Tekebaşı, Sutaşı, Çöğürlü and Meydan neighbourhoods in Samandağ District, Hatay Province. Land use in the Subproject area mainly consists of residential areas, agricultural land, local businesses and public roads.

The sewerage network and pumping mains are designed to follow existing public roads and municipal road corridors. Therefore, the construction of the pipeline network does not require permanent land acquisition or expropriation of privately owned land.

The Subproject also includes five pumping stations (TM1–TM5) located within the service area. Construction activities will be carried out within the designated project areas, including the pipeline routes, pumping station sites and temporary working areas.

As the pipelines will mainly be installed along existing roads, temporary restrictions on access to residential properties, businesses and agricultural land may occur during construction. These impacts will be minimized through appropriate construction planning, advance notification of affected residents and businesses, and provision of safe access.

The Subproject is not expected to result in physical or permanent economic displacement. Any unforeseen land-related impacts during implementation will be managed in accordance with the EIB Environmental and Social Standards, particularly Standard 6 on Involuntary Resettlement, and the Project Resettlement Framework.

2.4.3.1. Employment and Means of Livelihood

The Subproject area is located in Samandağ District of Hatay Province and covers Tekebaşı, Sutaşı, Çöğürlü and Meydan neighbourhoods.

The economy of Samandağ District is mainly based on agriculture, fishing, local trade and services. Agriculture is an important source of income, particularly in rural and semi-rural settlements. The fertile lands around the Asi River support the cultivation of vegetables, citrus fruits, olives and other agricultural products. Greenhouse farming and small-scale family farming are also common in the district. According to the Hatay Provincial Directorate of Agriculture and Forestry, 856 farmers were registered in Samandağ District in 2023.

Fishing is another important livelihood activity, particularly in coastal settlements. Small-scale fishing and related commercial activities contribute to household incomes. Local shops, markets, restaurants, transportation services and other small businesses also provide employment opportunities.

Within the Subproject area, Tekebaşı, Sutaşı and Çöğürlü neighbourhoods include residential areas surrounded by agricultural land. Agriculture, small businesses and local trade contribute to the livelihoods of residents in these neighbourhoods. Meydan neighbourhood, located along the Mediterranean coast, also has agricultural areas and fishing-related activities.

The earthquakes of 6 February 2023 significantly affected agricultural production, fishing activities, local businesses and employment opportunities in Hatay Province. The rehabilitation of municipal infrastructure is therefore important for supporting the recovery of local communities and economic activities.

The Subproject mainly involves the construction of sewerage pipelines along existing public roads. Therefore, permanent loss of agricultural land or livelihood activities is not anticipated. During construction, excavation works and temporary road closures may restrict access to agricultural fields, shops and other workplaces. Transportation of agricultural products and daily commercial activities may also be temporarily affected, particularly where construction takes place 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 will also create temporary employment opportunities during construction. In the long term, improved wastewater collection services are expected to contribute positively to public health, environmental conditions and the quality of life in the four neighbourhoods.

2.4.3.1. Education and Health Services

Education

Educational services in the Subproject area are provided through public schools operating under the Ministry of National Education. The four neighbourhoods are served by kindergartens, primary schools, secondary schools and high schools.

Tekebaşı neighbourhood includes Tekebaşı Kindergarten, Tekebaşı Kurtuluş Primary School, Tekebaşı Zeynel Abidin Cilli Primary School, Tekebaşı Secondary School and Tekebaşı Eczacı Maruf Cilli Anatolian High School.

In Sutaşı neighbourhood, educational facilities include Sutaşı Hacı Hasibe Hüzmeli Primary School, Sutaşı Seyfettin Sağaltıcı Primary School and Sutaşı Secondary School. Çöğürlü neighbourhood is served by Çöğürlü Primary School and Çöğürlü Secondary School.

These educational facilities are important sensitive receptors within the Subproject service area, particularly during excavation and pipe installation works.

Health Services

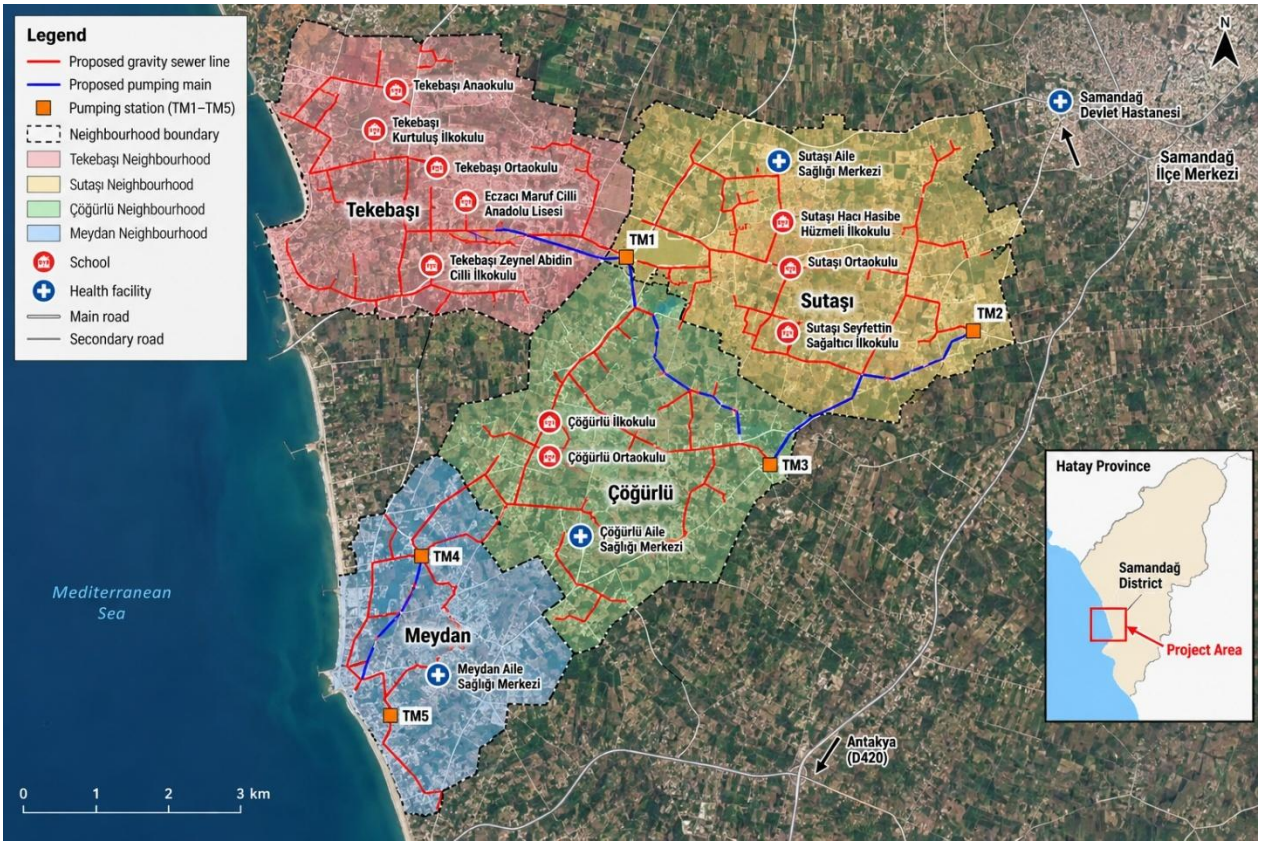
Healthcare services in the Subproject area are provided by Samandağ State Hospital and local Family Health Centres (FHCs).

Primary healthcare facilities identified in the four neighbourhoods include Tekebaşı Family Health Centre, Sutaşı Family Health Centre, Çöğürlü Family Health Centre and Meydan Family Health Centre. These facilities provide primary healthcare services, including general examinations, vaccination and preventive healthcare.

Samandağ State Hospital, located in the Sutaşı area, is an important healthcare facility serving the district and surrounding neighbourhoods. Additional healthcare services are available in Samandağ District Centre.

As the sewerage network will mainly be constructed along existing roads, temporary noise, dust, traffic disruption and restrictions on pedestrian access may occur near educational and healthcare facilities.

The Contractor will implement appropriate measures to maintain safe access to schools and healthcare facilities, including temporary pedestrian crossings, warning signs, traffic arrangements and advance notification of affected communities. Access for ambulances and other emergency vehicles will be maintained throughout construction.



2.4.3.1. Infrastructure Services

Water supply and wastewater services in Samandağ District are provided by Hatay Water and Sewerage Administration General Directorate (HATSU). The Tekebaşı Sewerage Network Subproject covers Tekebaşı, Sutaşı, Çöğürlü and Meydan neighbourhoods, where wastewater collection infrastructure is insufficient to meet the needs of the local population.

Wastewater disposal in these neighbourhoods has largely relied on individual septic tanks and limited existing sewerage infrastructure. The earthquakes of 6 February 2023 caused further damage to municipal infrastructure in Hatay Province, increasing the need for rehabilitation and improvement of essential services.

The sewerage network has been designed to meet the projected wastewater collection needs of the service area up to 2059. The proposed infrastructure will improve wastewater collection, reduce reliance on individual wastewater disposal systems and contribute to better environmental and public health conditions.

In addition to wastewater infrastructure, the four neighbourhoods are served by existing drinking water, electricity, telecommunications, road and municipal solid waste collection services. During construction, excavation works may temporarily affect existing underground utilities. Necessary measures will be implemented to protect these services and minimize interruptions in coordination with the relevant utility providers.

2.4.3.1. Transportation and Traffic

Samandağ District is located in the southwestern part of Hatay Province along the Mediterranean coast. The district is connected to Antakya and surrounding settlements through the existing regional road network. Transportation within the district is mainly provided by public roads and local streets.

The proposed sewerage pipelines will mainly be constructed along existing public roads and streets within these neighbourhoods. Therefore, the Subproject does not involve the construction of new roads or changes to the existing transportation network.

Construction activities will be carried out progressively along the pipeline routes. Temporary traffic arrangements may be required during excavation and pipe installation works. These activities will be managed through appropriate traffic management measures, including warning signs, safe pedestrian access and advance notification of local residents.

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

2.4.3.1. Cultural Heritage (Tangible and Intangible)

Samandağ District has a rich historical and cultural heritage reflecting the different civilizations that have lived in the Hatay region. The district contains important archaeological sites, historical structures and places of religious and cultural significance. The main cultural heritage assets in the district include:

- **Seleucia Pieria Ancient City:** Located in the Çevlik area of Samandağ, Seleucia Pieria was an important ancient port city during the Hellenistic and Roman periods. The remains of the ancient settlement are part of the district's archaeological heritage.
- **Vespasianus–Titus Tunnel:** Located near Çevlik, approximately 5 km from Samandağ District Centre, the tunnel was constructed during the Roman period to divert floodwaters and protect the ancient port. It is included in UNESCO's World Heritage Tentative List.
- **Beşikli Cave and Rock Tombs:** Located near the Titus Tunnel in the Çevlik archaeological area, the site contains rock-cut tombs dating to the Roman period.
- **Hıdırbey Musa Tree:** Located in Hıdırbey neighbourhood, this protected monumental tree is associated with local religious traditions and is an important cultural and natural heritage landmark.

In addition to these tangible heritage assets, Samandağ has a diverse intangible cultural heritage, including traditional agricultural practices, local cuisine, religious traditions and community customs.

The Tekebaşı Sewerage Network Subproject covers Tekebaşı, Sutaşı, Çöğürlü and Meydan neighbourhoods. The proposed sewerage pipelines will mainly be constructed along existing public roads and streets. The Subproject does not involve construction activities within the cultural heritage sites described above.

No direct impacts on the identified cultural heritage sites or local cultural practices are anticipated during construction or operation.

Nevertheless, archaeological remains may be encountered during excavation works. Therefore, a Chance Finds Procedure will be implemented as part of the ESMP. In the event of an unexpected discovery, construction activities in the affected area will be stopped, the site will be secured and the relevant authorities will be notified in accordance with national legislation.

Accordingly, no significant adverse impacts on tangible or intangible cultural heritage are anticipated, provided that the mitigation measures and Chance Finds Procedure specified in this ESMP are implemented.



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 mobilization, identification of existing utilities, trench excavation and support, dewatering where necessary, installation of sewer pipes, manholes, household connections and five package pumping stations. Stream crossings, electrical and mechanical installations, testing, backfilling and road reinstatement are also included.

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 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. Temporary facilities will be removed and disturbed areas reinstated after construction.

Construction of the separately planned WWTP is outside the scope of the financed sewerage works.

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 mobilization.

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 sewerage network and pumping stations. The system is designed to collect wastewater from connected properties and convey it through gravity sewers and pumping mains to the separately planned WWTP.

Routine activities will include inspection and cleaning of sewers and manholes, removal of blockages, maintenance of pumps and electrical equipment, and repair of damaged or leaking components. Waste removed during maintenance will be collected and disposed of appropriately.

3.2.2. Operation Facilities

The operational facilities comprise:

- Gravity sewers, household connections and manholes;
- Pumping mains and five package pumping stations;
- Associated electrical and control equipment.

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 prioritized where feasible. HATSU will determine staffing requirements for operation and maintenance.

3.4. Land Acquisition Status

The Tekebaşı Sewerage Network Subproject will be implemented in Tekebaşı, Sutaşı, Çöğürlü and Meydan neighbourhoods of Samandağ District, Hatay Province. The Subproject comprises approximately 82 km of gravity sewerage pipelines, 4.822 km of pumping mains and five package pumping stations (TM1–TM5).

The proposed sewerage 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 and agricultural areas. 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. 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 Hatay Provincial Directorate of Environment, Urbanisation and Climate Change confirmed, through Letter No. **E-26634441-220.03-8353667**, that the Tekebaşı Sewerage Network Project falls outside the scope of the EIA Regulation published on 29 July 2022 (Official Gazette No. 31907), as it is not included in the Regulation's annex lists. The letter requires compliance with other applicable environmental legislation and the acquisition of necessary permits.
- **Project approval:** According to the feasibility study, the detailed sewerage designs were approved by **HATSU in 2018**.

- **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, stream and utility crossings, and pumping station electricity connections 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.

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 sewerage network and pumping stations.

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 and İLBANK PIU of significant incidents within 24 hours and submit a detailed investigation report within 15 days.	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
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,	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

		crossing and electricity connection approvals where required. Apply relevant seismic design requirements.				
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 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.	Construction	Condition of stockpiles; drainage and erosion controls; reinstatement records; evidence of sediment movement	Daily during earthworks; after heavy rainfall; monthly review	Contractor / Supervision Consultant

5	Surface water pollution and stream crossings	Protect the Asi River, local streams and drainage channels from sediment, waste, fuel and concrete washwater. Prepare appropriate methods for stream crossings, maintain water flow and obtain required approvals. Keep stockpiles and equipment away from watercourses. Collect and treat contaminated runoff and reinstate affected banks after works.	Planning and construction	Approved crossing methods; condition of watercourses and banks; sediment controls; pollution incidents; water quality results where required	Before and during crossing works; daily near watercourses; after heavy rainfall; monthly review	Contractor, with HATSU coordination / Supervision Consultant
6	Groundwater pollution and excavation dewatering	Consider groundwater encountered in previous investigations when planning excavations. Provide suitable dewatering and trench support. Prevent refuelling and hazardous material storage within excavations. Direct dewatering water through settlement or treatment where necessary and confirm an authorised discharge arrangement. Investigate suspected contamination before discharge.	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
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	Planning and construction	Supplier permits and licences; delivery records; material storage conditions	Before supplier selection; when suppliers change; monthly review	Contractor / Supervision Consultant

		licences. Verify supplier documentation and store materials safely. Avoid unnecessary material use and transport.				
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 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.	Construction	Waste storage conditions; quantities and waste codes; transporter and facility authorisations; transfer records; complaints	Daily visual checks; at each waste transfer; monthly review	Contractor / Supervision Consultant

		Prohibit waste burning and dumping.				
10	Potential asbestos-containing materials	Check existing infrastructure for suspected asbestos-containing materials before disturbance. If suspected material is encountered, stop work in the affected area and arrange competent assessment. Where asbestos is confirmed, prepare and implement an Asbestos Management Plan. Use trained personnel, controlled removal methods, sealed and labelled packaging and authorised disposal. Do not reuse asbestos-containing material.	Planning and construction, if encountered	Pre-work checks; assessment results; management plan where required; training, removal and disposal records	Before disturbing existing infrastructure; continuously during any asbestos work; immediately upon discovery	Contractor / Supervision Consultant
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 SEA/SH Prevention and Response Action Plan where indicated by the risk assessment.	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
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	Construction	Maintenance records; visible exhaust emissions;	Daily visual checks; maintenance according to equipment	Contractor / Supervision Consultant

		exhaust condition and repair poorly performing equipment. Implement the Traffic Management Plan to reduce unnecessary vehicle movements.		idling practices; complaints	requirements; monthly review	
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 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.	Construction	Noise measurements at sensitive receptors; equipment condition; notifications; vibration-related damage reports; complaints	Daily checks; noise measurements monthly for the first three months, then quarterly if compliant; continue monthly following exceedances and increase monitoring in response to complaints or changes in work	Contractor / Supervision Consultant
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. Maintain emergency vehicle	Planning and construction	Approved traffic arrangements; pedestrian access; signs and barriers; 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

		access, control vehicle speeds and inform communities of diversions.				
17	Biodiversity and ecosystem disturbance	Obtain and implement the Nature Conservation and National Parks opinion. Clearly mark work 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.	Planning and construction	Official opinion; marked work areas; vegetation clearance and reinstatement records; wildlife observations; protection measures	Before site clearance; daily checks near sensitive locations; during reinstatement; monthly review	HATSU for the official opinion; Contractor for site 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	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

		anonymous submissions without retaliation. Apply requirements to subcontractors. Where accommodation is provided, ensure safe housing, drinking 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 first aid, emergency arrangements and incident reporting.	Construction	Training and health records; PPE use; operator qualifications; equipment inspections; work permits; incidents and corrective actions	Before work; daily inspections and briefings; 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. Design and install suitable shoring, shielding or safe slopes according to ground conditions and excavation depth. Provide secure barriers and safe access. Keep spoil, vehicles and equipment at safe distances from trench edges. Inspect excavations	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

		before each shift and after rain, ground movement or changes in conditions.				
21	Confined-space entry and hazardous atmospheres	Avoid entry into manholes, pumping shafts and sewers 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 utility disruption	Implement community safety measures under the C-ESMP. Secure excavations and work areas, provide safe temporary crossings and inspect barriers and lighting. Coordinate planned utility interruptions and notify affected users in advance. Identify nearby sensitive facilities and vulnerable users and maintain safe access. Provide a clearly publicised contact for complaints and emergencies.	Planning and construction	Barriers and crossings; utility coordination records; advance notices; sensitive receptor checks; community incidents and grievances	Before each work section; daily inspections; immediately after incidents; monthly review	Contractor and HATSU within their responsibilities / 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 community and worker grievance channels available for security-related concerns. Investigate complaints and implement corrective actions.	Construction	Security training; access arrangements; complaints and corrective actions	At appointment; ongoing supervision; monthly review and immediately following complaints	Contractor / Supervision Consultant
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	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

		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.				PIU and Supervision Consultant
26	Cultural heritage and chance finds	Apply the Project ESMF Chance Finds Procedure and train workers before excavation. If potential cultural heritage is found, stop work in the affected area, secure the location and notify the competent authority through HATSU and İLBANK PIU. Resume affected works only following the required clearance and instructions. Protect access to cultural and religious places.	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
27	Stakeholder engagement and grievances	Implement the Subproject SEP and maintain accessible community grievance channels. Inform residents and businesses about work locations, schedules, interruptions and access arrangements. Assign a community liaison contact. Provide suitable communication and assistance for vulnerable	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; annual SEP review and following significant changes	HATSU and Contractor within their responsibilities / İLBANK PIU, supported by the PMC and Supervision Consultant

		groups. Review and update the SEP annually and following significant changes.				
28	Sewer leakage, blockages, overflows and water pollution	Implement HATSU's inspection and preventive maintenance programme. Inspect and clean sewers and manholes, repair damaged components and respond promptly to blockages and overflows. Prevent stormwater and unsuitable waste entering the sewerage system. Record incidents, investigate recurring failures and coordinate with the receiving WWTP.	Operation	Inspection and cleaning records; leakage, blockage and overflow records; repair times; complaints; receiving treatment arrangements	According to the maintenance programme; immediately following faults and complaints; monthly records review	HATSU / HATSU's responsible E&S and operational staff, with İLBANK oversight under Project arrangements
29	Operational worker safety and confined-space entry	Apply OHS procedures for sewer cleaning, manhole entry and pump maintenance. Use trained workers, appropriate PPE, hygiene facilities and health surveillance. Require confined-space permits, atmospheric testing, ventilation, isolation, an attendant and rescue arrangements for entry. Apply electrical isolation and lockout procedures before maintenance.	Operation	Risk assessments; permits; gas testing and isolation records; training; health surveillance; equipment checks; incidents	Before each maintenance task and every confined-space entry; throughout entry operations; monthly review	HATSU / HATSU's responsible OHS and operational staff
30	Pump failure, power interruption, flooding and	Maintain pumps, controls, alarms and electrical equipment. Inspect backup and emergency arrangements identified in the	Operation	Pump and alarm checks; maintenance records; equipment availability;	Routine operational checks; scheduled maintenance; immediately	HATSU / HATSU's responsible operational and E&S staff

	emergency discharge	operating procedures. Prepare response procedures for pump failure, power loss, flooding and earthquakes. Coordinate emergency wastewater handling with relevant services and prevent uncontrolled discharges. Review recurring failures and implement corrective actions.		emergency procedures; failure and overflow records	following faults and severe events; monthly review	
31	Operational waste and hazardous materials	Collect sewer cleaning residues, removed solids, waste oils, electrical components and other maintenance waste separately. Prevent spills and contact with the public. Use secure storage and authorised collection, transport and disposal arrangements. Maintain waste records and prohibit disposal into drains, sewers or watercourses.	Operation	Waste quantities and transfer records; storage conditions; spill records; receiving facility authorisations	During each maintenance activity and waste transfer; monthly review	HATSU / HATSU's responsible E&S and operational staff
32	Noise, odour and community disturbance during operation	Maintain pumping equipment and covers to minimise noise and odour. Investigate complaints and carry out 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; odour observations; noise results where required; access arrangements; complaints and response records	Routine inspections; during maintenance; 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 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.	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

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.

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 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 organizations 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 findings to the PMC and PIU.

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 and spill prevention;
- Occupational and community safety, particularly excavation, confined-space work, machinery and traffic;
- 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.

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
HATSU – Defne District Service Office (Harbiye)	Harbiye Mahallesi, Atatürk Caddesi No: 141, Defne/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 – EIA Out of Scope

TASNİF DIŞI

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

Sayı : E-26634441-220.03-8353667
Konu : Muafiyet

HATAY SU VE KANALİZASYON İDARESİ GENEL MÜDÜRLÜĞÜNE

İlgi : a) 21.12.2023 tarihli ve 16959073-000-92681 sayılı yazınız.
b) 27/12/2023 tarihli ve 192501 Referans No'lu Başvuru.

Hatay İli, Samandağ,Hassa ve Kırıkhan İlçelerinde, Tekebaşı, Sutaşı, Kuşalanı, Çöğürlü, Meydan, Aktepe, Cumhuriyet, Kurtuluş, Mimar Sinan, Yeni Mahalle, Gündüz ve Menderes mahallelerinde tarafınızdan yapılması planlanan Tekebaşı (Hatay) Atıksu Kanalizasyon Şebekesi Projesi, Kırıkhan (Hatay) Atıksu Kanalizasyon Şebekesi Projesi ve Aktepe (Hatay) Atıksu Kanalizasyon Şebekesi Projesi, 29.07.2022 tarih ve 31907 sayılı Resmi Gazete'de yayımlanarak yürürlüğe giren ÇED Yönetmeliği Listelerinde yer almadığından kapsam dışı olarak değerlendirilmiştir.

Ancak, planlanan yatırım ile ilgili olarak, 5491 sayılı kanunla değişik 2872 sayılı Çevre Kanunu ile bu Kanuna istinaden çıkarılan Yönetmeliklerin ilgili hükümlerine uyulması ve diğer mer'i mevzuat çerçevesinde öngörülen gerekli izinlerin alınması, ekolojik dengenin bozulmamasına, çevrenin korunmasına ve geliştirilmesine yönelik tedbirlere riayet edilmesi gerekmektedir.

Bilgilerinizi ve gereğini arz ederim.

İsmail CEYLAN
Çevre, Şehircilik ve İklim Değişikliği İl Müdürü

Bu belge, güvenli elektronik imza ile imzalanmıştır.
Doğrulama Kodu: D69F6D71-5CF6-4032-B080-3638CAAFCFE3 Doğrulama Adresi: https://www.turkiye.gov.tr
hatay@csb.gov.tr
KEP Adresi : hataycevresehirilmud@hs01.kep.tr
Bilgi için:Güncel KİNEŞCİ
Çevre Mühendisi

TASNİF DIŞI

Annex B – 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 C – 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 ☐ Electrocution	☐ Vehicle Traffic Accident (Members of Public Only)
	☐ 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 D – 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 E – 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	