

From: [REDACTED]
To: [IPAM – Independent Project Accountability Mechanism; cao@worldbankgroup.org](mailto:cao@worldbankgroup.org)
Subject: URGENT GRIEVANCE: Manipulated Noise Measurements & Severe E&S Violations at Nakkaş-Basakşehir Motorway (EBRD ID: 52502)
Date: [REDACTED]

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Dear Independent Project Accountability Mechanism (IPAM - EBRD) and Compliance Advisor Ombudsman (CAO - IFC),

I am filing an urgent and formal grievance regarding the severe violation of Environmental and Social (E&S) Performance Standards at the **Nakkaş-Başakşehir Motorway Project (Section 8)** in Istanbul, Türkiye (EBRD Project ID: 52502). The project is managed by **Nakkaş Otoyol Yatırım ve İşletme A.Ş. (a subsidiary of Rönesans Holding)**.

I live on [REDACTED] [REDACTED] our neighborhood has been subjected to unbearable, continuous nighttime construction noise and dust. [REDACTED] because it is impossible to sleep. Our physical and mental health is severely deteriorating due to chronic sleep deprivation.

The Local Grievance Mechanism Has Completely Failed: When we call [REDACTED] to complain [REDACTED] they outright refuse to intervene. [REDACTED] completely ignoring the strict environmental noise limits (+3 dB / +5 dB) attached to that permit.

The Written Confession & Abuse of IFC/EBRD Standards: In an official written response [REDACTED] the project company referenced IFC and EBRD guidelines, claiming that night work is a "technical necessity" solely for the continuous pouring of U-section concrete using the **MSS (Movable Scaffolding System) method**.

This is a false justification used to mask severe E&S violations:

1. **Manipulated Noise Measurements (Written Confession):** In their official written response, the company openly admitted that their accredited monthly acoustic measurements *"do not always coincide with the concrete pouring or heavy construction activities."* This is a blatant confession that they are deliberately scheduling official noise measurements during quiet periods to manipulate baseline data and hide their extreme noise peaks from your compliance monitors.
2. **Abuse of Night Permits:** While MSS concrete pouring might rarely require continuous work, the company uses this excuse to conduct heavy, non-essential construction activities EVERY NIGHT until 04:00 - 05:00 AM. On nights when there is NO concrete pouring, we are continuously tortured by heavy drilling, metal-on-metal hammering, deafening generators, trucks left in reverse gear for hours emitting loud backup alarms, and workers shouting at each other at 03:00 AM instead of using radios.
3. **Severe Light Pollution:** In addition to the noise, massive construction floodlights are directed straight into our residential windows throughout the night, completely

destroying our living comfort and violating basic E&S standards.

4. **No Mitigation:** The company has failed to install any effective physical noise barriers despite operating inside a dense residential area.

They are using your institution's funding and name to legitimize a project that tortures the local community. I urgently request your compliance mechanisms to:

1. Immediately investigate this E&S violation, specifically the manipulated noise measurements.
2. Force the company to strictly ban all non-essential activities (drilling, hammering, reverse alarms) after 22:00.
3. Require the installation of proper physical noise barriers **and the repositioning of night floodlights.**



I am looking forward to your urgent intervention.

Sincerely,

[Redacted signature and contact information]