



Environmental & Social Action Plan Keskinoglu Project,



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Author (signature)	Maeve Fryday 
Project Manager/Director (signature):	Niall Smiddy 
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VERSION CONTROL RECORD				
Issue	Description of Status	Date	Reviewer Initials	Authors Initials
A	First draft	01.09.11	-	SG

01	First issue to Client	02.09.11	NPS	SG
B	Second draft – Phase A, Tranche 1	11/10/11	NPS	SG
02	Second issue to Client – Phase A, Tranche 1	17/10/11	NPS	SG
03	Third issue following client comments, Phase A, Tranche 1	28/10/11	NPS	SG
04	Fourth issue, Phase A, Tranche 1	01/12/11	NPS	SG
4A	Third draft to incorporate information from Kapakli EIA Report	07/08/12	NPS/NS	MF
05	Final issue to Client	07/08/12	NPS/NS	MF
05	Final issue for translation	23/08/12	NPS/NS	MF

Environmental and Social Action Plan (ESAP)

Introduction

This Environmental and Social Action Plan (ESAP) presents actions to be undertaken by Keskinoglu to manage potential environmental, occupational health and safety, and social impacts during construction and operation of the Project activities. The actions are divided into environmental, social, health and safety actions and are applicable to all relevant Keskinoglu facilities and operations, unless specified otherwise. Keskinoglu will take responsibility for the implementation of the actions and report the status of each to the EBRD on a regular basis (as agreed with EBRD).

No	Action	Environmental Risks Liability/ Benefits	Legislative requirement/ EBRD and IFC performance requirement/ Best practice	Investment Needs /Resources/ Responsibility	Timetable Action to be Completed by End of Year	Target and Evaluation Criteria For Successful Implementation	Comment
1	EHS Management and Training						
1.1	Develop and implement a corporate Environmental Management System (EMS).	Optimisation of environmental management through a formalised system.	EBRD PR1 Best international practice.	Own resources, external consultants. The Company is responsible.	By mid-2013	Develop an EMS. Attain ISO 14001 or equivalent. Annual EHS Report to the Bank	As part of overall company improvement.
1.2	Appoint a responsible environmental and occupational health and safety manager(s)/team.	Provide resources for training and monitoring of emissions.	EBRD PR 1 Best international practice.	Internal management. The Company is responsible.	By end 2012	Appointment of manager/team.	As part of overall company improvement.
1.3	Provide training for designated staff (e.g. shift managers) on environmental topics (e.g. waste management and spill prevention)	Improved environmental awareness and environmental management across all staff.	EBRD PR 1 Best international practice.	Internal management; possible external training consultants. The Company is responsible.	By mid 2013 with training repeated every 6 months.	Production of training records.	Can be included within the EMS.

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1.4	Implement a programme of Construction Environmental Management Plans (CEMPs) for all construction activities. To include the implementation of environmental controls for construction works to reduce/control impacts to ground and groundwater of spills, control waste generated and promote re-use of materials.	Improved environmental awareness and environmental management for contractors. Reduction of risk of impact to environment. Resource conservation and energy efficiency.	EBRD PR 1, PR3. Best international practice.	Internal management, possible external consultants. Company and contractors responsible.	Prior to and during all construction projects.	Production of CEMPs for all construction projects.	
1.5	Implement a regular programme of audits and monitoring for building contractors.	Assessment of contractor performance. Improved environmental awareness and environmental management for contractors.	EBRD PR 1 Best international practice.	Internal management. The Company is responsible.	During all construction projects.	Production of audit programme and reports.	Can be included within the EMS.
1.6	Complete all required EIA works and studies for the Kapakli project.	To ensure compliance with national regulations and EBRD requirements.	National environmental regulation (Turkish Regulation on Environmental Impact Assessment) EBRD PR 1	Internal management and external consultants. The Company is responsible.	Prior to construction.	EIA Positive Decision obtained from the Ministry of Environment and Urban Planning and acceptance from EBRD for financing the Project.	The Final EIA Report for Kapakli has been approved by the Ministry. Under normal conditions, this guarantees the issuance of EIA Positive Decision by the Ministry.

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1.7	Establish procedures to monitor the implementation performance of identified actions and record progress.	To ensure compliance with national regulations and EBRD requirements. To correct and improve performance.	EBRD PR 1 Best international practice	Internal management and the Company is responsible.	During construction and operation.	Production of records and monitoring reports.	Third parties consisting of specialists might be involved to perform monitoring activities.

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2	Environmental						
2.1	Obtain environmental permits for the Rahmiye and Kapakli Facilities. Comply with permit requirements.	To ensure compliance with permitting regulations.	National environmental permitting regulations; EBRD PR 3	Internal management. The Company is responsible.	Prior to operation as applicable.	Receipt of permits from authority.	
2.2	Develop and implement a water reduction programme to lower water consumption and reduce waste water generation.	Reduces exposure to water restrictions, particularly at the slaughterhouse and processing facility where there are limits imposed on the abstraction of water from the site boreholes. Resource conservation.	EBRD PR 3 Best international practice.	Internal management with resources from external consultants; within construction costs. The Company is responsible.	During the design phase, then continuous annual improvement.	Production of assessment report, implementation of reduction programme.	Can be included within the EMS as an ongoing improvement.
2.3	Develop and implement a waste management plan to include storage, segregation and disposal of all solid waste via licensed routes.	To ensure compliance with waste regulations and prevent releases of company generated wastes to the receiving environment. Resource conservation.	National environmental regulations. EBRD PR 1 and PR 3. Best international practice.	Internal management. The Company is responsible.	On commencement of operation.	Production of an assessment report, implementation of a reduction programme.	Can be included within the EMS.

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2.4	Develop and implement a hazardous waste management plan for handling, storage, use and disposal of flammable substances to be used.	To ensure compliance with national regulations and EBRD standards. Reduces the risk of accidental release of hazardous materials in to the environment.	EBRD PR 3 Best international practice	Internal management. The Company is responsible.	During construction.	Production of an assessment report.	
2.5	Provide all oil/diesel tanks with secondary containment to comply with international standards.	Reduces liability of accidental release of materials into the environment.	EBRD PR 3 Best international practice.	Within construction costs. The Company is responsible.	As part of the construction works.	Include in bank report once completed.	
2.6	Develop and implement an energy monitoring and saving programme to improve energy-efficiency at all sites.	Improved energy efficiency and cost savings.	EBRD PR 3 Best international practice.	Internal management with external consultants; within construction costs. The Company is responsible.	During the design phase, then continuous annual improvement.	Production of assessment report, implementation of reduction programme.	Can be included within the EMS as an ongoing improvement.
2.7	Implement an emergency response action plan to identify major potential environmental hazards.	To be prepared for potential uncontrolled environmental releases. To ensure compliance with the EBRD requirements.	EBRD PR 4 Best international practice.	Internal management with external consultants. The Company is responsible	During construction and operation	Production of an emergency action plan, regular testing of this plan and implementation of the plan when required.	

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2.8	Develop and implement an environmental monitoring programme. Include odour monitoring in line with 2012 Odour Regulations.	An environmental monitoring programme will serve to ensure that all appropriate parameters are properly monitored.	EBRD PR3 Best International Practice	Internal Management . The company is responsible	During construction and operation	Production of a comprehensive monitoring programme that is adhered to.	<p>This programme should form part of the EMS.</p> <p>It is suggested that the following parameters are monitored;</p> <ul style="list-style-type: none"> - Annual monitoring of air emissions from point sources - Fortnightly monitoring of WWTP effluent. - Sampling of septic tank effluent prior to collection. - Six monthly sampling of poultry dust levels. - Annual monitoring of noise levels within the production areas.

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2.9	Improve the WWTP performance	To reduce environmental impacts and to ensure compliance with EBRD requirements, e.g. pollution prevention.	EBRD PR3	Internal Management - The company is responsible	Within six months after signing of the Loan Agreement	Success to be based on reduced specific effluent volume, e.g. m ³ effluent/tonne of production and improved effluent quality.	This action should be undertaken in conjunction with action 2.2, water management programme. Actions to be taken include; - Reinstate chemical treatment to improve effluent quality
2.10	Implementation of drainage management measures	To manage surface run-off and/or storm water.	Best international practice.	The Company is responsible.	During the design phase; As part of construction works for new developments.	Check of design and coordination of construction works.	

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3	Biological						
3.1	Identify the habitats of flora and fauna elements to be affected by Rahmiye project activities.	To determine potential impacts of the project on natural habitats and species inhabiting these habitats.	National and international agreements. EBRD PR 6	Internal management with external consultants. The Company is responsible	Prior to the onset of construction	Preparation of reports on characteristics of habitats and records on existing species composition.	Conduct an initial habitats survey which should confirm the preliminary observations that the project areas are agricultural and industrial lands with no sensitivities. If any sensitive receptors are identified during the initial survey then a more detailed survey with proposed mitigation measures will need to be undertaken. Flora and fauna surveys were conducted at the Project area in the scope of Kapakli EIA studies.

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3.2	If the initial survey in 3.1 identifies sensitive receptors then a wildlife management plan to reduce impact on flora and fauna species should be implemented.	To ensure protection of the biological environment throughout the project cycle	National and international agreements. EBRD PR 6	Internal management with external consultants. The Company is responsible	Prior to the onset of construction	Coordination with the contractor during construction works.	The Kapakli EIA Report does not identify any species of higher sensitivity.
3.3	If the initial survey in 3.1 identifies sensitive receptors then a monitoring plan for species of higher sensitivity should be implemented.	To assure sustenance of vulnerable flora and fauna populations	National and international agreements. EBRD PR 6	Internal management with external consultants. The Company is responsible	Through construction and operation	Preparation of monitoring reports	The Kapakli EIA Report does not identify any species of higher sensitivity.

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4	Social						
4.1	Implementation of the SEP.	Improved relations with the community and stakeholders and decreased complaints.	EBRD PR 10 Best international practice.	Keskinoglu will take overall responsibility for consultation with all stakeholders in relation to the Project and will use available resources to ensure that all consultation activities are conducted to the appropriate standard. Keskinoglu will form an SEP Team in charge for stakeholder engagement	By the end of 2012 and on an ongoing basis as required.	A suitable set of key performance indicators (KPI) will be used by Keskinoglu to monitor stakeholder engagement. Disclosure of a Non-Technical Summary and the ESAP.	Can be included within the EMS.

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4.2	Establish an effective grievance mechanism.	Ensure proper response to stakeholders' concerns.	EBRD PR 10 Best international practice	The Company is responsible to establish a procedure in order to receive and respond to comments, concerns, questions, etc coming from various stakeholders.	Throughout the project cycle	Records of concerns and relevant responses.	
4.3	Review the HR policy and update as required in line with EBRD requirements.	Ensure EBRD and EU best practice requirements are complied with.	National regulations EBRD PR2 Best international practice.	The Company is responsible.	By the end of 2012 and on an ongoing basis as required.	Production of updated HR policy and dissemination to all staff.	
4.4	Cultural Heritage - develop a chance find procedure and require implementation by all contractors.	Protect potential local cultural assets from adverse impacts of project activities and avoid penalties due to relevant legislation	National regulations EBRD PR8 Best international practice.	The Company is responsible.	Develop prior to construction. Implement during construction.	Monitoring reports during construction.	As part of the development plans.

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5	Health and Safety						
5.1	Provide safe working conditions on-site including enforcement of the requirements to use personal protective equipment (head, hand and foot protection) by all workers involved in construction, operation and / or maintenance teams.	Decreased work accidents and increased productivity. Decreased liability with regard to national legislation.	National regulations EBRD PR2	The Company is responsible.	During construction and operation	Regular monitoring and monitoring reports	Can be included within the EMS.
5.2	Development and implementation of traffic management plan.	Decreased accidents and improved efficiency.	EBRD PR 2 Best international practice.	The Company is responsible.	During construction and operation in the facilities and connecting to the main roads	Traffic management plan and regular monitoring reports.	Can be included within the EMS
5.3	Undertake periodic safety inspections in accordance with national requirements.	Decrease accident and emergency risks and improve readiness to emergency situations.	National regulations EBRD PR 2 Best international practice.	The Company is responsible.	During construction and operation	Regular monitoring and monitoring reports	Can be included within the EMS.

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5.4	Implement a hygiene plan for workers and the working environments.	Decrease the risk of any poultry-related infectious disease.	EBRD PR 2 Best international practice.	The Company is responsible	Ongoing during operation	Regular monitoring and check-ups.	Can be included within the EMS.
5.5	Implement monitoring and best practice measures for the reduction of risk from poultry dust explosion.	Reduction of risk from poultry dust explosion.	Best international practice.	The Company is responsible	Ongoing during operation	Regular monitoring and check-ups.	Can be included within the EMS.

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6	Animal Health						
6.1	Develop and implement a hygiene plan to avoid spread of diseases amongst animals.	Avoids any form of cross contamination with other facilities.	Regulation (EC) No 854/2004	Internal management. Company is responsible.	Ongoing during operation	Regular monitoring and preparation of monitoring reports, animal records.	
6.2	Develop and implement an emergency plan in case of a disease outbreak.	To prevent further spread of the disease.	Regulation (EC) No 854/2004	Internal management. Company, especially veterinarians are responsible.	Ongoing during operation	Production of an emergency action plan, testing of this plan and implementation of the plan when required.	