

## Environmental & Social Action Plan – September 2016

Task Title & Description	Anticipated Completion Date
<b>PS 1</b>	
1. Develop and submit to MIGA a clear and functioning stand-alone ESMS for the construction phase	Within 60 days of the Effective Date of the Contract of Guarantee
2. Update the ESMS for the operations phase and submit to MIGA	At least 3 months prior to operations.
3. Appoint a qualified Environmental and Social Manager/Team to implement the ESMS for construction and provide MIGA with the name and qualifications of the person / people appointed	Within 30 days of the Effective Date of the Contract of Guarantee
4. Appoint a qualified Environmental and Social Manager to implement the ESMS for operations and provide MIGA with the name and qualifications of the person / people appointed	At least 3 months prior to operations.
5. Submit to MIGA the official opinion of the Gaziantep Provincial Directorate of Environment and Urbanisation (PDoEU) for EIA exemption	Within 30 days of the Effective Date of the Contract of Guarantee
6. Prepare and submit to MIGA a ‘Legal and Other Requirements Determination and Compliance Register’	Within 60 days of the Effective Date of the Contract of Guarantee
7. Update the following existing management plans for operation: <ul style="list-style-type: none"> <li>• The overall Project ESMP.</li> <li>• Air Quality Management Plan</li> <li>• Emergency Preparedness and Response Plan</li> <li>• Healthcare Waste Management System</li> <li>• Water and wastewater Management Plan (separating wastewater from Oncology hospital and Main hospital)</li> <li>• Health Campus Internal Traffic Management Plan</li> <li>• Hazardous Material Handling Procedure and Management Plan</li> <li>• Human Resources Policy</li> <li>• Occupational Health and Safety Management Plan</li> <li>• Patients’ Rights Charter</li> <li>• Security Management Policy and Plan</li> <li>• Stakeholder Engagement Plan</li> <li>• Stakeholder Grievance Mechanism (to include provisions for hospital users and visitors)</li> <li>• Worker / Staff Grievance Mechanism</li> </ul>	At least 3 months prior to operations
8. Undertake a third party life and fire safety audit and appoint a Life and Fire Safety Expert (third party)	Within 60 days of the Effective Date of the Contract of Guarantee

<b>Task Title &amp; Description</b>	<b>Anticipated Completion Date</b>
<b>PS 2</b>	
9. Develop and submit to MIGA a Workers' Camp Management Plan detailing how provisions will be made for compliance with the EBRD/IFC Guidelines for Temporary Accommodation	Within 60 days of the Effective Date of the Contract of Guarantee
10. Develop a worker grievance mechanism in line with PS2 requirements	Within 30 days of the Effective Date of the Contract of Guarantee
11. Undertake an independent labour audit to ensure the project complies with PS 2	Annually during the construction phase
Develop and implement an orientation and training program including OHS training for all hired workers	At least 3 months prior to operations
12. Develop and implement a Workers' Code of Conduct	Within 60 days of the Effective Date of the Contract of Guarantee
<b>PS 3</b>	
13. Conduct an analysis of the selected tri-generation plant compared to other heating and power options to evaluate the GHG performance	Within 60 days of the Effective Date of the Contract of Guarantee
14. Prepare and submit to MIGA a plan for pesticide handling, storage and use during operations	At least 3 months prior to operations
15. Prepare and submit to MIGA a Radioactive Substance Management Plan	At least 3 months prior to operations
<b>PS 4</b>	
16. Prepare and submit to MIGA an Exposure Control Plan for blood-borne pathogens and inform employees/workers/visitors of infection control policies	At least 3 months prior to operations
17. Establish an Infection Control Committee	At least 3 months prior to operations
18. Set up a Patient Advisory Liaison Service	At least 3 months prior to operations