

Annex A

## Administrative Framework

Table A1.1 Administration Framework

Standards/Regulation	Summary	Relevance	Relevant permit requirements or other actions as per the applicable regulations
<b>Turkish Regulatory Framework</b>			
<b>Environment</b>			
<b>General</b>			
Environment Law (No. 2872), as amended in 2006 (by No. 5491) (Official Gazette Date/Number: 16.08.1983/18132; last amended on 04.07.2015)	The Environment Law is Turkey's primary framework for environmental legislation and is supported by a series of regulations. Article 10 of the Environment Law sets the framework for the EIA Regulations.	Yes, the Project has the potential for environmental impacts that will need to be assessed with regard to the Environment Law.	<b>Relevant permits as per the applicable regulations</b> (e.g. EIA, Environmental Permit (discharge, air, noise- if necessary), temporary waste storage area permit, etc.)
EIA Regulation (Official Gazette Date/Number: 25.11.2014/29186; Last amended on 09.02.2016)	<p>The EIA Regulations require that a Project Introduction File be prepared for projects that may cause environmental issues as a result of their proposed activities, and if environmental issues are likely to be significant, an EIA must be undertaken and an EIA report must be prepared in order to obtain a permit or licence to construct and operate a new development.</p> <p>The EIA Regulations also include limited provisions for stakeholder engagement.</p>	<p>In terms of Turkish regulatory requirements, hospital projects do not fall within the scope of the Turkish EIA Regulation.</p> <p>Apart from the main Project, associated facilities such as the tri-generation plant and boilers will be subject to Turkish EIA requirements based on their capacities.</p> <p>Based on the developing design information at the time of writing, it is understood that the total rated thermal input of all combustion activities within the installation is approximately 58 MWt (the combined thermal input of the tri-generation plant during the operational phase is understood to be 17.5-18.0 MWt and the boilers are expected to be</p>	<b>EIA Positive Decision</b> or <b>EIA Not Required Decision</b> or <b>EIA Exemption Letter</b>

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		<p>approximately 40MWt) which is above the threshold value of 20 MWt given in Annex-2 of the Turkish EIA regulation.</p> <p>There will be two concrete batching plants each with a capacity of 120 m<sup>3</sup>/h. These concrete batching plants will be subject to Annex-2 of the Turkish EIA Regulation as they exceed the threshold value of 100m<sup>3</sup>/h.</p>	
<p>Regulation on Environmental Permits and Licenses (Official Gazette Date/Number: 10.09.2014/29115; last amended on 12.09.2014)</p>	<p>The purpose of this regulation is to regulate the procedure and principles during permitting and license liabilities pursuant to “Environmental Law (2872)”. The regulation comprises the permitting and license liabilities of the activities and facilities listed in the same regulation. <i>The following activities/facilities listed under the Annex-2 of the regulation are relevant or are potentially relevant to the project components.</i></p> <p><b>Operation phase:</b> <i>Hospitals: Annex-2, Item 10.9 - Hospitals and health institutions with bed capacity of 20 and above and dialysis center out of the hospitals and medical center constitutions (15 devices and above). Cogeneration or Trigeneration plant: Annex-2, Item 1.3 - Combined cycle, combined heat power plants, internal combustion engines and gas turbines with thermal power between 1 - 100 MW (combustion engines and gas turbines used in mobile power plants included).</i></p> <p><b>Construction phase</b> <i>Annex-2, Item 2.13- Facilities that produce concrete, mortar or road materials using cement with a</i></p>	<p>Yes, the Project has to fulfil the requirements of this regulation during construction and operation phases due to the fact that the capacities of hospital, tri-generation plant and concrete batching plant are included within the scope of the Regulation.</p>	<p><b>Temporary Operation Permit and Environmental Permit,</b> <i>as necessary (i.e. for environmental noise, air emissions, wastewater discharge, deep-sea discharge)</i></p>

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	<i>production capacity of 10 m<sup>3</sup>/hour or above, including the areas where these materials are mixed in their dry form.</i>		
Environmental Audit Regulation (Official Gazette Date/Number: 21.11.2008/27061; last amended on 16.08.2011)	This Regulation sets out the principles and procedures of environmental inspection for business and activities to impose qualifications and obligations of inspection officers, environmental management unit/environmental employee and authorized firms for environmental services.	Yes, as above.	<b>Yearly environmental audit by environmental officer or Environmental Management Unit or authorized consulting company</b> <b>Notification to the governorship regarding obtaining environmental consulting service from an authorized consulting company</b>
Regulation on Environmental Officers and Environmental Consulting Firms (Official Gazette Date/Number: 21.11.2013/28828; Last Amended 06.05.2014)	The regulation defines the environmental officials' qualifications, responsibilities and the documenting and the principles and procedures about granting a certificate of competency to environmental consulting firms. <i>Health institutions and hospitals with bed capacity of 20 and above are listed in Annex-2 of this regulation.</i>	Yes, as above.	<b>Employ at least one environmental officer or establish Environmental Management Unit or acquire environmental management services from an authorized consulting company (for Annex-2 activities)</b>
<b>Water</b>			
Water Pollution Control Regulation (Official Gazette Date/Number: 31.12.2004/25687; last amended on 10.01.2016)	The purpose of this Regulation is to set the legal and technical principles to be followed in the control of water pollution, in order to protect the ground and surface waters and to prevent water pollution. The regulation provides quality criteria for surface and marine waters, rules and principles for water pollution control, industry specific discharge (effluent) standards, and the principles for discharging wastewater into the	Yes, the Project has the potential to influence the quality of surface and groundwater (e.g. through discharge of hospital wastewater and surface runoff) and will need to discharge to the foulwater network.	<b>Wastewater discharge permit</b> (within the scope of the "Environmental Permit") - required if wastewaters are discharged into receiving environments) <b>Wastewater connection permit</b> (for connection to sewer system)

Standards/Regulation	Summary	Relevance	Relevant permit requirements or other actions as per the applicable regulations
	surroundings, the sea or the sewer system.		
Surface Water Quality Management Regulation (Official Gazette Date/Number: 30/11/2012/28483; last amended on 15.04.2015)	This Regulation sets the procedures and principles related to the identification and classification of the biological, chemical, physicochemical and hydromorphologic quality of surface water, coastal water and transit water; monitoring of the quantity and quality of the waters; and mitigation measures for putting forward the purpose of the water usage in accordance with the sustainable development targets and at the same time considering the protection and utilization balance, and protection and obtaining good water quality.	As above.	
Urban Wastewater Treatment Regulation (Official Gazette Date/Number: 08.01.2006/26047; last amended on 10.01.2016)	This regulation sets out principles for the collection, treatment and discharge of urban wastewater and the treatment and discharge of wastewater from certain industrial sectors. The objective of the regulation is to protect the environment from the adverse effects of the above mentioned wastewater discharges.	This Regulation maybe applicable if wastewater is connected to municipal sewer system.	<b>Ensure necessary conditions are met as stated in this regulation</b>
Law on Groundwater (No. 167) (Official Gazette Date/Number: 23.12.1960/10688; last amended on 01.03.2013) and State Hydraulic Works, Technical Regulation on Groundwater (Official Gazette Date/Number: 23.06.1972/14224; last amended on 07.06.2011/27957)	This Law defines the legal framework for groundwater usage. Related permits should be received from the State Hydraulic Works (DSI) for groundwater exploration, and construction and operation of wells to be utilized by facilities for groundwater abstraction purposes.	As reported by SPV, groundwater abstraction is not expected. If it is decided to use groundwater sources, necessary permits shall be obtained.	<b>Well utilization permit</b> <i>- if necessary</i> <b>and</b> <b>Installation of a measuring system</b> – <i>if a well is abstracted</i>
Regulation on the Protection of Ground waters against Pollution and Deterioration (Official Gazette Date/Number: 07.04.2012/28257; last amended on 22.05.2015)	The aim of this Regulation is to identify all relevant principles associated with the protection of the existing (base case) groundwater condition (those are in good water quality), prevention of groundwater deterioration and pollution and determination of the measures to remediate those sources.	Might be applicable if groundwater is used, which is currently not expected.	

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<b>Air</b>			
Industrial Sourced Air Pollution Control Regulation (Official Gazette Date/Number: 03.07.2009/27277; last amended on 20.12.2014)	This Regulation aims to control and reduce soot, dust, gas, steam and aerosol emissions due to industries and energy producing installations to protect human health and prevent air pollution.	This regulation is likely to be applicable related to tri-generation plant and boiler systems.	<b>Air emissions permit</b> <i>(within the scope of the "Environmental Permit")</i> - may be required for tri-generation and concrete batching plant <b>Emissions Measurement Report</b> <i>(may be required for tri-generation plant)</i>
Regulation on Assessment and Management of Air Quality (Official Gazette Date/Number: 06.06.2008/26898; last amended on 05.05.2009)	This Regulation sets the principles and objectives concerning air quality so as to avoid or reduce harmful effects on human health and the environment.	This regulation might be applicable related to emissions to air (e.g. directly through tri-generation plant and boiler system, or indirectly through traffic) if any work is requested by the relevant authorities (e.g. Provincial Directorate of Environment and Urbanization, municipality)	
Regulation on Control of Exhaust Gas Emissions and Gasoline and Diesel Oil Quality (Official Gazette Date/Number: 30.11.2013/28837)	This Regulation sets out the principles and procedures to ensure reduction of exhaust gas pollutants and their control by monitoring, in order to preserve the environment from pollution caused by motor vehicles in traffic.	Yes, the Project is likely to generate air emissions (exhaust gas pollutants) during both construction and operation phases caused by motor vehicles.	<b>Exhaust measurement stamp and Exhaust emission certificate for the vehicles</b>
<b>Soil</b>			
Regulation on Soil Pollution Control and Point-Source Contaminated Sites (Official Gazette Date/Number: 08.06.2010/27605; last amended on 11.07.2013)	The regulation defines the principles and procedures to prevent the contamination of soil, to determine the sites and sectors where pollution exists or is likely to exist, and to remediate and monitor contaminated soil and sites in line with the sustainable development goals.	Yes, the previous uses of the site are currently unknown and soils could be contaminated.	<b>Preliminary Activity Information Sheet</b>

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<b>Waste</b>			
Waste Management Regulation (Official Gazette Date/Number: 02.04.2015/29314)	The Waste Management Regulation lays down the principles and procedures concerning the management of wastes from their production to disposal and preserving the environment and human health at the same time; and use of natural sources through waste reduction, reuse and recycling. This regulation also covers market surveillance and controlling of the products having key characteristics, features and provisions in terms of environment and human health.	Yes, waste will be generated during the construction and operation of the Project which will need to be appropriately managed. The Project has also potential to generate hazardous wastes.	<b>Hazardous waste financial liability insurance Notification to the MEUP</b>
Regulation on Control of Excavated Soil, Construction and Demolition Wastes (Official Gazette Date/Number: 18.03.2004/25406; last amended on 26.03.2010)	This Regulation sets out the general procedures and principles, technical and administrative standards regarding the collection, storage, recycling, recovery, disposal and excavation of construction wastes.	Yes, the Project is likely to generate excavation materials from construction that will be waste if they cannot be re-used on-site.	<b>Waste transportation and acceptance certificate</b>
Medical Waste Control Regulation (Official Gazette Date/Number: 22.07.2005/25883; last amended on 21.03.2014)	This Regulation sets out the principles for the collection, temporary storage, transportation and disposal of medical wastes generated from operational activities of health institutions.	Yes, the Project will generate medical wastes during operation and during construction although this will likely to be in small amounts.	<b>Construction of Temporary Storage Area or provision of container Building license for temporary storage area Yearly medical waste notification/declaration to the MEUP Internal Unit Waste Management Plan Waste receipt document/National waste transportation form Personnel issues (periodical trainings and medical checks, personal protective</b>

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Regulation on Wastes Generated from Radioactive Substances Use (Official Gazette Date/Number: 02.09.2004/25571)	This Regulation determines disposal conditions of wastes generated from the use of radioactive materials and defines limits and conditions regarding the collection, storage and disposal of the wastes generated from usage of the radioisotopes with half-lives less than 100 days and C-14 and H-3 containing radioactive substances in medical, industrial and research fields. The regulation sets out discharge limits for liquid wastes, solid wastes, gas emissions as well as the procedures that must be followed with respect to such wastes.	Yes, radioactive wastes will be generated during the operation of the project which need to be appropriately managed.	<i>equipment etc.)</i> <b>Ensure that the requirements of the regulation are met</b>  <b>Keep records of all solid, liquid and gaseous wastes contaminated with radioactive substances</b>
Radioactive Waste Management Regulation  (Official Gazette Date/Number: 09.03.2013/28582)	This Regulation sets out the procedures and principles regarding safe management of the radioactive wastes generated from use of the nuclear energy and ionized radiation sources, considering safety of employees, society, environment and next generations.	Yes, same as above.	<b>Ensure that the requirements of the regulation are met</b>
Hazardous Waste Control Regulation (HWCR) (Official Gazette Date/Number: 14.03.2005/25755; last amended on 05.11.2013) (this regulation was repealed on 02.04.2016 and continue to be covered under the Waste Management Regulation)	This Regulation aims to control the production and transportation of hazardous wastes; to minimise their production and (in cases where production is inevitable) to provide disposal at the point nearest to the place the waste was generated.	Yes, the Project has potential to generate hazardous wastes.	<b>Hazardous waste management plan</b> <b>Temporary storage area permit (if necessary)</b> <b>Yearly hazardous waste notification to the MEUP (Waste Declaration Form)</b> <b>National Waste Transportation Form</b>
Communiqué on Recycling of Certain Non-hazardous Wastes (Official Gazette Date/Number: 17.06.2011/27967; Last amended on 11.03.2015)	This Communiqué aims the minimization, collection, separation, temporary storage, recycling and reuse the certain non-hazardous wastes, constitution of recycling facilities etc.	Yes, non-hazardous wastes will be generated by the Project.	<b>Non-hazardous waste management plan</b> <b>Non-hazardous Waste Declaration Form (as of 01.01.2015)</b>



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Waste Oil Control Regulation (Official Gazette Date/Number: 30.07.2008/26952; last amended on 05.11.2013)	This Regulation seeks to control and manage waste oils, to protect human health and maintain environmental protection.	Yes, the Project has the potential to generate waste oils.	<b>National Waste Transport Form Annual waste oil declaration to the MEUP (Waste Oil Declaration Form)</b>
Packaging Waste Control Regulation (Official Gazette Date/Number: 24.08.2011/28035)	This Regulation governs collection, recycling, and disposal of packaging waste.	Yes, the Project has the potential to generate packaging waste.	<b>Necessary record keeping in line with the regulation</b>
Regulation on Control of Waste Batteries and Accumulators (Official Gazette Date/Number: 31.08.2004/25569; last amended on 23.12.2014)	This Regulation sets principles for the disposal of batteries and accumulators and defines the labelling and marking, reducing the amount of hazardous materials in manufacturing process and collection, transportation and disposal of waste batteries separately from other domestic wastes.	Yes, the Project is likely to generate waste batteries and accumulators.	<b>Transport of the batteries and accumulators by certified collectors and disposal in certified facilities</b>
Regulation on Control of End of Life Tires (Official Gazette Date/Number: 25.11.2006/26357; last amended on 11.03.2015)	This Regulation seeks the principles related with the end-of-life tyre management.	Yes, the Project has the potential to generate end-of-life tyres.	<b>Give waste tires to an authorized hauler free of charge or tire distribution and sale companies</b>
Regulation of Control of Waste Vegetable Oils (Official Gazette Date/Number: 06.06.2015/29378)	This Regulation determines the storage of waste vegetable oils and their transfer to waste oil recycling/disposal facilities by licensed haulers.	Yes, there is a potential to generate waste vegetable oils from dining halls.	<b>Ensure that waste vegetable oils stored in appropriate container/vessel and transferred with licensed haulers</b>  <b>Necessary record keeping in line with the regulation</b>  <b>National waste transportation form</b>

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Regulation on Control of Waste Electrical and Electronic Equipment (Official Gazette Date/Number: 22.05.2012/ 28300)	This regulation establishes the juridical and technical principles regarding the minimization of usage of electrical waste and electronic equipment (from its generation to final disposal) in order not to cause any impact on both environment and human health as well as identification of the applications to be scoped out, control of import of electrical and electronic equipment, reuse, recycling and recovery methods and targets.	Yes, there is a potential to generate electrical waste and electronic equipment during both construction and operation phase.	<b>Transfer these wastes to the specifically designated collection areas established by producers, distributors municipality and/or operators</b>
<b>Noise</b>			
Regulation on the Assessment and Management of Environmental Noise (Official Gazette Date/ Number: 04.06.2010/27601; last amended on 18.11.2015)	The regulation establishes standards for acceptable levels of noise and vibration during the day and at night in different environments (residential, commercial, industrial, etc), limits on increases in noise levels and standards for construction sites. The regulation also covers principles and criteria for buildings exposed to vibration.	Yes, as the Project is likely to affect background noise e.g. through processes and traffic.	<b>Acoustic Report</b> <b>Environmental noise level assessment report</b> (if requested by relevant authority) <b>Noise permit</b> (within the scope of the "Environmental Permit") - may be required for tri-generation plant
<b>Chemical Control</b>			
Regulation on Chemical Inventory and Control (Official Gazette date/ number: 26.12.2008/27092; last amended on 23.05.2010)	This Regulation sets out the guidelines for chemical inventory to be registered and submitted to the MEUP for chemicals that are imported or produced from site operations.	Maybe relevant, if the quantity of chemicals to be imported is 1 ton and above per year.	<b>The chemicals produced or imported more than 1 ton and above in a year shall be registered to the MEUP</b>
Regulation on Ozone Layer Depleting Substances (Official Gazette Date/Number: 12.11.2008/27052; last amended on 12.11.2008)	This Regulation provides guidelines on decreasing the use of ozone layer depleting substances in line with the Montreal Protocol.	Yes, the Project will likely use substances that fall in this regulation.	<b>Ensure the leakage and Periodic Control of Fixed Equipment</b>
Regulation on Road Transportation of Hazardous Materials (Official Gazette Date/Number: 24.10.2013/28801; last amended on 31.12.2015)	This Regulation sets forth rules governing the transportation of hazardous materials by road. The Regulation has been adopted in compliance with the European Agreement Concerning the International Carriage of Goods by Road.	Yes, the Project will be transporting Hazardous Wastes by road.	<b>Transportation Authority Certificate</b> (relevant hauler should hold this permit)

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<b>Nature Conservation and Biodiversity</b>			
Forest Law (No. 6831) (Official Gazette Date and Number: 08.09.1956/9402)	The purpose of this law is the protection of forests. This law states that forest areas can be used by real persons and legal entities for installations which are for the public benefit after obtaining a permit from Ministry of Forestry and Water Works, and the period of the permit cannot exceed 49 years pursuant to article 17 of this law.	No, the Project is not located in a forest area.	
<b>Cultural Heritage</b>			
Law on Preservation of the Cultural and Natural Assets (No. 2863) (Official Gazette Date/Number: 23.07.1983/18113; last amended on 11.10.2013)	This Law sets out the cultural and natural assets to be preserved and establishes an organisation that implements its provisions.	Maybe applicable, if chance finds are encountered.	<b>Contact museum directorate in case of a chance find during construction</b>
<b>Energy Consumption</b>			
Regulation on Increasing Efficiency in the Use of Energy Sources and Energy (Official Gazette Date/Number: 27.10.2011/28097; Last amended on 03.09.2014)	The purpose of this regulation is to regulate procedures and principles regarding increasing efficiency in the use of energy and energy sources, in order to ensure effective use of energy, to prevent waste of energy, to decrease energy costs and protect the environment. According to the regulation, industrial facilities which annually consume 1000 TEP (Tons equivalent petroleum) of energy and above employ a certified employee as energy manager. Commercial and service buildings which occupy a construction area of 20,000 m2 and above or annually consume 500 TEP of energy and above and public sector buildings which occupy a construction area of 10,000 m2 or annually consume 250 TEP of energy and above employ a certificated employee as energy manager. In such cases that it is not possible to employ an energy manager among the employees, this service is supplied from external energy managers or companies.	Yes, the Project needs to consider energy efficiency activities.	<b>Energy Manager or Energy Management Unit (if required)</b>

Standards/Regulation	Summary	Relevance	Relevant permit requirements or other actions as per the applicable regulations
Regulation on Energy Efficiency in Buildings (Official Gazette Date/Number: 05.12.2008/27075; last amended on 20.04.2011)	Article 2 - The following are out of the scope of this regulation: Buildings with utilization area less than 50 m <sup>2</sup> , industrial buildings built for production purposes, temporary buildings (less than 2 years) and other buildings which do not require heating/cooling (such as warehouses). Article 25 involves provisions regarding the preparation of Energy Identification Document.	Yes, as above.	<b>Energy Identification Document</b>
<b>Occupational and Community Health &amp; Safety</b>			
Labor Law (No. 4857) (Official Gazette Date/Number: 10.6.2003/25134; last amended on 20.05.2016)	This Law aims to regulate the working conditions and work-related rights and obligations of employers and employees working under an employment contract.	Yes, workers will be employed as part of construction and operation of the Project.	<b>Workplace notification</b>
Occupational Health and Safety Law (No. 6331) (Official Gazette Date/Number: 30.06.2012/28339; Last amended on 11.06.2015)	This law aims to regulate the employer and the employees' duties, powers, responsibilities, rights and obligations to provide the occupational health and safety at work and improve the current health and safety conditions.	Yes, as above. In addition, the Project has the potential to have occupational health and safety risks and impacts during construction and operation.	<b>Onsite doctor Health and Safety specialist Health and Safety Unit (if required) Risk Assessment Emergency Action Plan Safety Report Major incident prevention policy</b>
Occupational Health and Safety Risk Assessment Regulation (Official Gazette Date/Number: 29.12.2012/28512)	This Regulation sets out the procedures and principles of the risk assessment in terms of occupational health and safety.	Yes, as above.	<b>Risk assessment</b>
Regulation on the Provisions of Occupational Health and Safety Training of Employees (Official Gazette Date/Number: 15.05.2013/28648)	This regulation sets out the principles for health and safety trainings to be given at workplaces to employees by the employers.	Yes, as above.	<b>Employee training</b>
Regulation on Occupational Health and Safety Services (Official Gazette Date/Number: 29.12.2012/28512; last amended on 18.12.2014)	This Regulation sets out the principles related to the establishment of 'workplace health and safety units' and certification of 'common health and safety units', and set out the duties and responsibilities of these units.	Yes, as above.	<b>Occupational health and safety specialist On-site doctor and other health personnel Workplace</b>

Standards/Regulation	Summary	Relevance	Relevant permit requirements or other actions as per the applicable regulations
			<b>occupational health and safety unit</b> <b>Hold an approved Notebook</b>
<p>Communiqué on Danger Class Lists Related to Occupational Health and Safety  (Official Gazette Date/Number: 26.12.2012/28509; Last amended on 20.02.2016)</p>	<p>This Communiqué classifies the works in three categories including less dangerous works, dangerous works and very dangerous works in Annex-1 of the Communiqué.  <i>According to the Annex-1 of the regulation, danger class of potential Project components are classified as below:</i>  41.20.01-Construction of non-residential buildings ((factory, and atelier aimed to industrial productions, school, hotel, hospital, shopping mall, restaurant, sport complex, mosque, parking garage etc.): “Very dangerous”  86.10.04-Hospital services given by public bodies intended to provide human health and require special expertise (gynecology, oncology, psychiatric hospitals etc.): “Very dangerous”.  35.11.19-Energy generation: “Very dangerous”</p>	<p>Yes, as above. The regulation includes activities that are part of the Project.</p>	<b>Identification of the danger class categorization of the activities</b>
<p>Regulation on Duties, Authority, Responsibilities and Trainings of Occupational Safety Specialists  (Official Gazette Date/Number: 29.12.2012/28512; last amended on 15.02.2016)</p>	<p>This Regulation lays down the principles related to the qualifications, trainings, certification, duties, authority and responsibilities of the occupational safety specialists.  <i>For a workplace of a very dangerous class and having 250 and more workers, one full time occupational specialist per 250 workers is required. If the numbers of the workers are greater than the multiple of 250, additional numbers of occupational health and safety specialists are appointed considering the remaining number of workers.</i></p>	<p>Yes, as above.</p>	<b>Occupational health and safety specialist</b> <i>(working duration is determined considering the specification of the project components such as numbers of workers, danger class etc.)</i>
<p>Regulation on the Occupational Health and Safety Boards  (Official Gazette Date/Number: 18.01.2013/28532)</p>	<p>This Regulation determines workplaces in which health and safety boards are to be established, and the working methods and the tasks, authorities, working procedures and principles of these boards.</p>	<p>Yes, as above.</p>	<b>Occupational Health and Safety Board</b>

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	<i>The Regulation covers the workplaces and activities within the scope of the Occupational Health and Safety Law, with minimum 50 workers that work permanently and with permanent jobs that last more than 6 months.</i>		
Regulation on the Health and Safety Measures to be taken in Workplace Buildings and Additions (Official Gazette Date/Number: 17.07.2013/28710)	This Regulation identifies minimum health and safety conditions in the workplace buildings and additions under the scope of the Occupational Health and Safety Law.	Yes, as above.	<b>Employers are obliged to apply minimum conditions stated in Annex-1 of the regulation</b>
Regulation on Health and Safety at Construction Works (Official Gazette Date/Number: 05.10.2013/28786)	The purpose of this regulation is to determine the minimum health and safety requirements to be taken in construction works. <i>Annex-IV of the regulation defines the necessary measures for health and safety at the construction site by taking into account the minimum requirements.</i>	Yes, as above.	<b>Health and Safety Coordinator (if required)</b> <b>Health and Safety Plan Signboard</b>
Regulation on the Tasks, Authority, Responsibility and Education of On-Site Doctor and Other Health Personnel (Official Gazette Date/Number: 20.07.2013/28713; Last amended on 07.03.2016)	The purpose of this regulation is to set out the principles related to the qualifications, education, certification, duties, authority and responsibilities of the workplace doctors and also authorization of public health centres.	Yes, as above.	<b>On-site doctor</b>
Regulation on Health and Safety Requirements in the Use of Work Equipment (Official Gazette Date/Number: 25.04.2013/28628; Last amended on 02.05.2014)	This Regulation lays down the minimum requirements to be met in terms of health and safety in the use of work equipment.	Yes, as above.	<b>Regular maintenance of the equipment</b>  <b>Informing/training of workers on how to use the equipment</b>
Regulation on Manual Handling (Official Gazette Date/Number: 24.07.2013/28717)	This Regulation identifies principles to determine the necessary measures at work locations where manual handling is performed, to protect the workers from the risks particularly from back injuries.	Yes, as above.	<b>Ensure necessary measures are taken as in line with this regulation</b>
Regulation on Fire Protection of Buildings (Official Gazette Date/Number:	This Regulation sets out the procedures and principles to protect any building, workplace, facility etc. against fire. Temporary or	Yes, as above. Health facility operations area exposed to life and fire safety risks, as they are accessible	<b>Fire Safety Report</b>

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19.12.2007/26735; Last amended on 09.07.2015)	<p>permanent, official or private construction activities and their additional facilities are treated under this regulation.</p> <p>Pursuant to "Regulation on Opening and Operation Licenses of Workplaces", any company employing more than 30 employees is required to obtain a report which proves that the precautions taken against fire in the workplace are sufficient.</p>	to the public.	
Regulation on the Emergency Cases in Workplaces (Official Gazette Date/Number: 18.06.2013/28681)	The purpose of this regulation is to determine procedures and principles regarding the preparation of emergency response plans, prevention, protection, evacuation, firefighting, first aid, employers to be assigned to these areas and similar issues.	Yes, the Project needs to undertake necessary precautions for emergency cases.	<b>Preparation of an Emergency Response Plan</b>
Regulation on the Use of Personal Protective Equipment in Workplaces (Official Gazette Date/Number: 02.07.2013/28695)	The purpose of this regulation is to determine the principles regarding the properties, supply and use of personal protective equipment (PPEs) in cases when risks are not prevented or minimized sufficiently with collective protection based on technical measures or working methods.	Yes, the Project needs to provide necessary personal protective equipment to workers.	<b>Ensure that necessary PPEs are supplied</b>
Regulation on Safety and Health Signs (Official Gazette Date/Number: 11.09.2013/28762)	The regulation sets out the rules for the implementation of health and safety signs in workplaces.	Yes, the Project needs to place necessary signs in the workplace.	<b>Supply and properly use of the health and safety signs</b>  <b>Ensure the training of employees</b>
First Aid Regulation (Official Gazette Date/Number: 29.07.2015/29429)	This Regulation sets forth the principles related to first-aid.	Yes, the Project needs to be prepared for incidents where first-aid would be needed.	<b>One first-aider (holding a basic first aid certificate) per 10 employees should be present at the facilities that are considered as heavy and dangerous works and one first-aider (holding a basic</b>

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			first aid certificate) per 20 employees should be present at the all institutions and organizations. The first aider shall hold a certificate of 'Basic First-Aid Training' that is taken by the authorized first-aid training body.
Regulation on the Protection of the Workers against Risks Relevant to Noise (Official Gazette Date/Number: 28.07.2013/28721)	This Regulation aims to determine the necessary measures to protect the workers from health and safety risks, especially from risks associated with hearing due to exposure to noise.	Yes, there is a potential for noise related risks during construction and at some areas during operation.	<b>Assess and measure the level of noise (if necessary)</b>  <b>Ensure that necessary PPEs are supplied</b>
Regulation on the Protection of the Workers against Vibration Risks (Official Gazette Date/Number: 22.08.2013/28743)	This regulation aims to determine the necessary measures to protect the workers from health and safety risks due to exposure to mechanical vibration.	Yes, as above.	<b>As above</b>
Regulation on Working Duration Related to Labour Law (Official Gazette Date/Number: 06.04.2004/25425)	This Regulation governs the principles for the implementation of working duration.	Yes, workers will be employed as part of construction and operation of the Project.	<b>Ensure compliance with this regulation for working duration</b>
Regulation on Excess Work and Work in Excess Periods on Labour Law (Official Gazette Date/Number: 06.04.2004/25425; last amended 06.06.2004)	The purpose of this regulation is to set out the principles for works that are above the weekly working period set out in Labour Law.	Yes, as above.	<b>As above</b>
Regulation on Occupational Health and Safety in Temporary or Fixed Term Employment (Official Gazette Date/Number: 23.08.2013/28744)	The aim of this regulation is to ensure that workers with an employment relationship governed by a fixed-duration contract or on a temporary employment are afforded the same level of protection as that of other workers.	Yes, as above. In addition, the Project has the potential to have occupational health and safety risks and impacts during construction and operation.	<b>Ensure compliance with this regulation regarding fixed and/or temporary employment</b>



Standards/Regulation	Summary	Relevance	Relevant permit requirements or other actions as per the applicable regulations
Regulation on Special Principles in Works Carried out by Employing Workers in Shifts (Official Gazette Date/Number: 07.04.2004/25426)	This Regulation sets out the principles on work durations, night work, week holidays and breaks in works with shifts.	Yes, workers will be employed as part of construction and operation of the Project.	<b>Submission to the relevant regional directorate, of the list of shift workers and a copy of the health reports issued before starting work</b>
Regulation on the Minimum Wage (Official Gazette Date/Number: 01.08. 2004/25540; last amended on 19.04.2014)	This Regulation lays down the principles and procedures regarding the determination of gross minimum wage for employees and attendance fee for committee president, members and reporters.	Yes, as above.	<b>Ensure that minimum wage requirements are met</b>
Regulation on Suspension of Work in Workplaces (Official Gazette Date/Number: 30.03.2013/28603; Last amended on 11.02.2016)	Regulation specifies the conditions that may lead to the suspension of works in workplaces and procedures and principles on permission to resumption.	Yes, as above. In addition, the Project has the potential to have occupational health and safety risks and impacts during construction and operation.	<b>Suspend the work totally or partially in case of life threatening situations, until situation is avoided</b>
Regulation on Health and Safety Measures in Works with Carcinogenic and Mutagenic Substances (Official Gazette Date/Number: 06.08.2013/28730)	The regulation is to be applied to workplaces where the workers may be at risk to be exposed to carcinogenic and mutagenic substances.	Yes, as above.	<b>Ensure that the Risk Assessment is in place in work places with Carcinogenic and Mutagenic Substances Undertake necessary mitigation measures pursuant to this regulation</b>
Regulation on Health and Safety Measures in Works with Chemical Substances (Official Gazette Date/Number: 12.08.2013/28733)	The aim of the regulation is to lay down minimum requirements to protect the health of workers from the dangers and adverse effects of chemical substances that are present, used or processes at workplaces, and to create a safe working environment.	Yes, as above.	<b>Undertake risk assessment Ensure to inform and train employee on chemical substances, the health and safety risks of these substances, occupational diseases, the occupational exposure limit values</b>

Standards/Regulation	Summary	Relevance	Relevant permit requirements or other actions as per the applicable regulations
			<b>and other legal regulations, measures to be taken and the material safety data sheets</b>
Regulation on Protection of Workers from Dangers of Explosive Environments (Official Gazette Date/Number: 30.04.2013/28633)	The regulation lays down the measures for the protection of health and safety of employees from the dangers of explosive environment that can be arise at workplaces. This regulation is applicable for the workplaces within the scope of the Occupational Health and Safety Regulation and having potential to cause explosive environment. However, workplaces for medical treatment for the patients and medical treatment applications are out of the scope of this regulation.	Yes, there will be blasting during the construction of the Project.	Ensure compliance with this regulation
Regulation on the Prevention of Exposure Risks from Biological Agents (Official Gazette Date/Number: 15.06.2013/28678)	The purpose of this regulation is to regulate minimum provisions for the protection of the workers in workplaces against biological factors to prevent health and safety risks. The regulation covers the workplaces and works within the Occupational Health and Safety Law, the works which potentially cause biological effects on workers, and works stated in Annex-1. <i>Annex 1, 4- Work in healthcare, including isolation and post-mortem unit.</i> <i>Annex 1-5- Work in clinical, veterinary and diagnostic laboratories, excluding diagnostic microbiological laboratories.</i>	Yes, the Project has the potential to result in risks from biological agents.	<b>Determination of risk group</b> <b>Biological risk assessment</b> <b>Notification (if required)</b> <b>Periodical health control of workers</b>
Regulation on the Works in which Workers shall Work Maximum Seven and Half Hours or Less in a Day in Terms of Health Rules (Official Gazette Date/Number: 16.07.2013/28709)	The aim of this regulation is to regulate the maximum working time at workplaces specified in this regulation considering health principles. Article 4 of the regulation defines the works in which workers shall work maximum seven hours. Following works listed under this article are potentially relevant to the works within the scope of the project:	Yes, the Project has the potential to include works as described in this regulation.	<b>Define the works that require working for maximum seven hours and take necessary measures</b>

Standards/Regulation	Summary	Relevance	Relevant permit requirements or other actions as per the applicable regulations
	<i>Works with radioactive and radioionised substances Noisy works exceeding the highest level of effective noise exposure (8h=85 dB(A))</i>		
Regulation on Radiation Safety (Official Gazette Date/Number: 24.03.2000/23999; last amended on 03.06.2010)	The purpose of this regulation is to ensure safety of people and environment against ionizing irradiation. The regulation covers measures and actions against radiation sources.	Yes, the Project is likely to have an impact on human and environment resulting from radiation sources during operation.	<b>License for activities involving radiation and related Distress Plan</b>
Regulation on the Working Principles and Radiation Dosage Limits of the Personnel Working with Ionizing Radiation Resources in Health Services (Official Gazette Date/Number: 05.07.2012/28344)	The purpose of this regulation is to (i) protect all relevant personnel working in diagnosis, treatment or research works with radiation resources in health institutions against potential radiation risks (ii) determine radiation dosage limits (iii) determine principles of working conditions and (iv) determine measures to be taken in case of any limit excess.	Yes, as above.	<b>License Written instruction Radiation Safety Committee (if required)</b>
Regulation on Safe Transportation of Radioactive Substances (Official Gazette Date/Number: 08.07.2005/25869)	The purpose of this regulation is to provide environmental safety of society, radiation officers and environment during the transportation of the radioactive substances by road, railway, airway and seaway. The regulation covers loading, transport, unloading, temporary storage and delivery of the radioactive substance.	Yes, the Project will include use of radioactive substances during operation and their temporary storage needs to be undertaken according to this regulation.	
<b>Health Sector</b>			
Regulation on Improvement and Evaluation of Quality of Health (Official Gazette Date/Number: 26.06.2015/ 29399)	The purpose is regulation is to regulate the procedures and principles related to quality standards based on patient safety, employee safety, satisfaction of patients and employees; and application of these standards to ensure provision of good quality services in health facilities. This regulation covers governmental and private institutions and organizations providing diagnosis, treatment and rehabilitation services together with providing preventing health services.	Yes, the Project is within the scope of this regulation.	

Standards/Regulation	Summary	Relevance	Relevant permit requirements or other actions as per the applicable regulations
<p>Regulation on Management of Inpatient Treatment Institutions (Official Gazette Date/Number:13.01.1983/ 17927, last amended on 20.02.2007)</p>	<p>The purpose of this regulation is to specify practice principles of various services; duties, authorizations and responsibilities of personnel; and to provide rapid, good quality and economic hospital management meeting with proper to necessities of modern age and realities of the country.</p> <p><i>The regulation covers oral and dental health centers under the authority of the Ministry of Health and health facilities specified in the article 5 of this regulation.</i></p> <p><i>Article 5, specifies the health facilities in 5 different classes as district/town hospitals, Day hospitals, General Hospitals, special branch hospitals and education and research hospitals. General hospitals are defined as; health facilities with at least 50 bed capacity where examinations and outpatient and inpatient treatments of relevant patients are made without making discrimination on age and sex in special branches within the Hospital together with serving all emergency situations</i></p>	<p>Yes, as above.</p>	
<p>Regulation on Control of Infection in Inpatient Treatment Institutions (Official Gazette Date/Number: 11.08.2005/ 25903, last amended on 25.06.2011)</p>	<p>The purpose of this regulation is to prevent and control infectious diseases generated due to health services and identify the problems associated with this subject and organize and perform solution activities, and to establish an infection control committee for conveying decisions to be taken at inpatient treatment institutions level to necessary authorities and to regulate the procedures and principles relating to the manner of work, duties, authorities and responsibilities of this committee.</p>	<p>Yes, as above.</p>	
<b>Patient's Rights</b>			
<p>Patient's Rights Regulation (Official Gazette Date/Number: 01.08.1998/23420; Last amended on</p>	<p>The purpose of this regulation is to set 'patient's rights' as a reflection of 'human rights' and regulate procedures and principles regarding the</p>	<p>Yes, the regulation is applicable for the operation.</p>	

Standards/Regulation	Summary	Relevance	Relevant permit requirements or other actions as per the applicable regulations
08.05.2014)	people benefiting from patient's rights in all healthcare institutions and organizations.		
<b>Legislation that mentions High Security Health Facilities</b>			
Turkish Criminal Law (No. 5237) (Official Gazette Date/Number: 12.10.2004/25611; Last amended on 05.05.2016)	<p>The objective of Criminal Law is to protect the individual rights and freedom, public order and security, state of justice, public health and environment, and communal peace, as well as to discourage commitment of offences. This Law defines the basic principles for criminal responsibility and types of crimes, punishments and security precautions to be taken in this respect.</p> <p>The Criminal Law refers to the use of high security health institutions for the treatment of mentally ill people. Article 32 of the Law defines insanity and Article 57 of the Law provides information on security precautions specific to mentally ill people.</p>	This Law can be considered for the High Security Forensic Psychiatric Hospital that will be present inside the Health Campus. However, it should be noted that this law is not directly applicable for the Project.	
The Law on the Execution of Penalties and Security Measures (No. 5275) (Official Gazette Date/Number: 29.12.2004/25685)	<p>The purpose of this Law is to lay down the procedures and rules concerning the execution of penalties and security measures.</p> <p>This law describes high security closed penal execution institution and include provisions for the postponement of execution due to illness including insanity. The definition of high security closed penal execution is given in article 9 of the law as follows:</p> <p><i>Article 9. High-security closed penal execution institutions are facilities which have internal and external security personnel, and equipped with technical, mechanical, electronic and physical barriers against escape, in which the doors of rooms and corridors are always kept closed, where contacts between convicts, who are not in the same room and with the outside world, are possible only in such cases as are specified in legislation, and where convicts subject to a tight security regime are accommodated</i></p>	As above.	

Standards/Regulation	Summary	Relevance	Relevant permit requirements or other actions as per the applicable regulations
	<p><i>in single or three-person rooms. In such institutions, individual or group rehabilitation methods shall be implemented.</i></p> <p>The definition given in article 9 is for high security closed penal execution institution. There is no specific definition for a high security forensic psychiatric hospital or a high security health institution in the existing law and regulations.</p>		
<b>Public Private Partnership Model</b>			
<p>Basic Law on Healthcare Services (No. 3359) (Official Gazette Date/Number: 15.05.1987/ 19461; Last amended on 07.04.2016)</p>	<p>The purpose of this law is to regulate general principles regarding the healthcare services. Pursuant to the Law, health institutions and organizations are planned, coordinated, financially supported and developed by the Ministry of Health by taking other relevant Ministries' opinions.</p>	<p>Yes, this Law is applicable for the overall planning of the Project.</p>	
<p>Regulation on the Construction of New Healthcare Facilities against Lease and the Renovation of Existing Healthcare Facilities against Operation of Non-Medical Services and Functional Areas of Activity (Official Gazette Date/Number: 22.07.2006/26236; last amended on 22.05.2010)</p>	<p>The purpose of this Regulation is to regulate the procedures and principles in regards with commissioning the real persons or private law legal entities to be selected via a tender for constructing the healthcare facilities deemed necessary by the Higher Planning Board, on the lands owned by such persons/entities or owned by the Treasury, within the framework of the preliminary projects and designs and the fundamental standards to be prepared by the Ministry of Health for each healthcare premise, in consideration for the lease of such facilities to the constructing persons/entities against a predetermined amount of lease and for a certain period which cannot be more than forty-nine years; and transfer by the Ministry of Finance for this purpose of the real properties owned by the Treasury through establishing free of charge right of construction in favour of such real persons or private law legal entities for a period</p>	<p>Yes, as above.</p>	

Standards/Regulation	Summary	Relevance	Relevant permit requirements or other actions as per the applicable regulations
	up to forty-nine years; and determining the amount and term of such lease; and renovation of the existing healthcare facilities against operation of the non-medical services and functional areas of activity in the facilities; and methods of the tender to be held for these purposes; and determination of the qualifications to be sought at the bidders; and the scope of the contracts and other pertinent issues.		
Law on Construction, Renewal and Service Procurement via Public-Private Sector Partnership Model by the Ministry of Health and Amendments of Certain Laws and Decrees (No. 6428) (Official Gazette Date/Number: 09.03.2013/ 28582; Last amended on 16.04.2015)	The purpose of this law is to determine procedures and principles regarding the following: construction of the facilities considered as necessary by Ministry of Health and subsidiaries on treasury land by establishing independent and continuous right of construction for a period not exceeding 30 years excluding fixed investment period specified in the contract, renewal of existing facilities, obtaining consultancy, research and development services and certain services which require advanced technology and high financial resources for such projects.	Yes, as above.	
<b>Other Legislation</b>			
Regulation on Workplace Opening and Operating Licenses (Official Gazette Date/Number: 10.08.2005/25902; Last amended on 26.11.2014)	The regulation governs the principles and procedures in issuing opening and operation licenses required for workplaces. The regulation covers regulatory affairs (authorization) and auditing of sanitary and non-sanitary workplaces. The regulation designates the metropolitan municipalities, municipalities, municipal district or first level municipalities, provincial special administrations and organized industrial zone administrations as competent authorities for licensing. The type of opening and operation license an establishment has to possess depends on whether it is listed as a	Yes, this regulation is applicable for the Project.	<b>Opening and Operating License</b> ( <i>single license may be prepared for Hospitals and ancillary facilities</i> ) <b>Location Selection and Facility Construction Permit</b> ( <i>for the first class non-sanitary workplaces</i> ) <b>Trial Permit</b> ( <i>for non-sanitary workplaces</i> ) <b>Fire safety report</b>

Standards/Regulation	Summary	Relevance	Relevant permit requirements or other actions as per the applicable regulations
	sanitary workplace (Annex-1) or non-sanitary workplace (Annex-2) under the regulation.		

European Directives and International Conventions		
Standards/Regulation	Summary	Relevance
Environmental Impact Assessment (EIA) Directive 2011/92/EU, as amended by Directive 2014/52/EU	The EIA Directive requires the environmental assessment of certain projects so that relevant authorities can make decisions on whether a project should proceed in the knowledge of its likely significant environmental effects. On 12 March 2014, European Parliament voted to adopt substantive amendments to the EIA Directive 2011/92/EU, which Member States must transpose into local law by 16 May 2017. The main amendments relate to screening, scoping, the requirement for verification of the ES by accredited experts, monitoring, time limits (e.g. for adoption of screening opinions and public consultation).	No, hospital developments are currently exempt from EIA under Turkish Law. The capacity of tri-generation plant and boilers is below the threshold of 300 MW thermal specified in the EIA Directive. Therefore, this Directive will not be applicable.
The Waste Framework Directive 2008/98/EC	The Waste Framework Directive sets out the basic concepts and definitions related to waste management, it explains when waste ceases to be waste and becomes a secondary raw material, and lays down basic waste management principles in the waste management hierarchy.	Yes, waste will be generated during the construction and operation of the Project which will need to be appropriately managed.
The Industrial Emissions Directive 2010/75/EU	The Industrial Emissions Directive defines the obligations to be met by industrial activities with a major pollution potential and makes special provisions for combustion plants, waste incineration or co-incineration plants, certain installations and activities using organic solvents or producing titanium dioxide. The Directive does not apply to research activities, development activities or the testing of new products and processes.	The hospital complex includes a Technical Services Building, comprising of a Tri-generation plant with a capacity of 17 MW <sub>th</sub> and a boiler plant with a capacity of 40 MW <sub>th</sub> , and therefore a total installed capacity of 57 MW <sub>th</sub> . The Industrial Emissions Directive applies to facilities with a “total rated thermal input” of greater than 50 MW <sub>th</sub> installed plant. There is no derogation in the Industrial Emissions Directive relating to the



European Directives and International Conventions		
Standards/Regulation	Summary	Relevance
		condition of operations (ie how many boilers or tri-generation units operate at any one time, or the number of planned hours of operation). Given the installed capacity, the Industrial Emissions Directive therefore applies.
Directive on Ambient Air Quality and Cleaner Air for Europe 2008/50/EC	The Directive on Ambient Air Quality and Cleaner Air for Europe sets air quality objectives for particulate emissions to air including limit values and exposure related objectives.	Yes, the Project is likely to release emissions to air either directly e.g. through a tri-generation plant and a boiler system or indirectly through traffic.
Directive on the Assessment and Management of Environmental Noise 2002/49/EC	The 'Environmental Noise Directive' defines a common approach to avoid, prevent or reduce harmful effects from environmental noise.	Yes, the Project is likely to include noisy processes that would need to be monitored and assessed.
The Water Framework Directive 2000/60/EC, as amended	The Water Framework Directive establishes a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater. The Directive requires Member States to establish river basin districts and to prepare a management plan for each of these and has a series of implementation deadlines e.g. it seeks to achieve 'good' ecological status of all aquatic ecosystems in Member States by 2015.	Yes, the Project has the potential to influence the quality of surface and groundwater (e.g. through surface runoff) and will need to discharge to the foul water network.
Urban Waste Water Treatment Directive 1991 91/271/EEC	This Urban Waste Water Directive aims to protect the environment from the adverse effects of urban waste water discharges and discharges from certain industrial sectors.	Yes, the Project has potential to generate surface water runoff that would need to be appropriately managed.
The Groundwater Directive 2006/118/EC	The Groundwater Directive proposes specific measures to prevent and control groundwater pollution and to achieve good groundwater chemical status, in the context of the Water Framework Directive.	Yes, as above.
Directive 92/43/EEC on the Conservation of Wild Fauna and Flora, as amended in 1997 and 2007	The 'Habitats Directive' promotes the maintenance of biodiversity by requiring Member States to take measures to maintain or restore natural habitats and wild species at a favourable conservation status. It provides for the identification and classification of Special Areas of Conservation (SAC) for habitats listed on Annex I and species	Yes, this Directive may be applicable to the Project if it is likely to impact on protected habitats or species, or a SAC is located near to the site.

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Standards/Regulation	Summary	Relevance
	listed on Annex II. It sets the framework for Habitat Regulations Assessment of projects that are likely to have significant effects on the integrity of European Protected Sites (SACs or Special Protection Areas (SPA)).	
Directive 2009/147/EC on the Conservation of Wild Birds	The 'Birds Directive' provides a framework for the conservation and management of, and human interactions with, wild birds in Europe. It provides for the identification and classification of SPAs for rare or vulnerable species listed in Annex I and establishes a general scheme of protection for all wild birds.	Yes, this Directive may be applicable to the Project if it is likely to impact on birds or their habitats, or a SPA is located near to the site.
The Convention on Wetlands of International Importance 1971	The 'Ramsar Convention' covers all aspects of wetland conservation and wise use.	This Convention is unlikely to be applicable to the Project, although the location of wetlands near to the site will need to be determined.
The Aarhus Convention (on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters) 1998	The Aarhus Convention establishes a number of rights of the public (individuals and their associations) with regard to the environment. It provides for the right of everyone to receive environmental information that is held by public authorities; the right to participate in environmental decision-making and the right to review procedures to challenge public decisions.	Yes, appropriate stakeholder engagement will need to be undertaken as part of the ESIA process
Directive on Freedom of Access to Information on the Environment 2003/4/EC	The purpose of this Directive is to ensure that environmental information is systematically available and distributed to the public. This encompasses various environmental information, including environmental impact studies and risk assessments.	Yes
Directive 2010/32/EU on Prevention from Sharp Injuries in the Hospital and Healthcare Sector	The purpose of the Directive is to prevent workers' injuries caused by all medical sharps and to protect workers at risk.	Yes, The Project will use medical sharps during operation.
European Blood Directive 2002/98/EC	The purpose of the Directive is to set standards of quality and safety for blood (and blood components) throughout the blood transfusion chain. It applies to the collection and testing of human blood and blood components, irrespective of their final destination. It also applies to the processing, storage and	Yes, The Project will undertake blood transfusions.

European Directives and International Conventions		
Standards/Regulation	Summary	Relevance
	distribution of human blood and blood components intended for transfusion.	
Tissue and Cells Directive 2004/23/EC	The Directives sets standards of quality and safety for the donation, procurement, testing, processing, preservation, storage and distribution of human tissues and cells.	Yes, The Project will deal with tissues and cells.
EU directives on pharmaceuticals including Directive 65/65/EEC, Directive 75/318/EEC, Directive 75/319/EEC, Directive 93/41/EEC, Directive 93/42/EEC, Directive 2001/20/EC, Directive 2001/83/EC, and Directive 2005/28/EC	<ul style="list-style-type: none"> <li>• Directive 65/65/EEC stipulated that a medicinal product may only be placed on the market in the EU after a Marketing Authorisation has been granted.</li> <li>• Directive 75/318/EEC on the approximation of the laws relating to analytical, pharmaco-toxicological and clinical standards and protocols in respect of the testing of proprietary medicinal products.</li> <li>• Directive 75/319/EEC on the approximation of provisions laid down by law, regulation or administrative action relating to proprietary medicinal products.</li> <li>• Directive 93/41/EEC on the approximation of national measures relating to the marketing of high-technology medicinal products.</li> <li>• Directive 93/42/EEC concerning medical devices.</li> <li>• Directive 2001/20/EC on the implementation of good clinical practice in the conduct of clinical trials on medicinal products for human use.</li> <li>• Directive 2001/83/EC community code relating to medicinal products for human use.</li> <li>• Directive 2005/28/EC sets out the principles and detailed guidelines for good clinical practice as regards conducting clinical trials of medicinal products for human use, as well as the requirements for authorisation of the manufacturing or importation of such products.</li> </ul>	Yes
Patients' Rights in Cross-Border Healthcare Directive 2011/24/EU	The Directive sets out the rules on patient access to healthcare in another EU country, including reimbursement.	Yes
Directive 96/29/Euratom - ionizing radiation	The aim of the Directive is to establish uniform basic safety standards to protect the health of workers and the general public against the dangers of ionising radiation. The Directive shall apply to all practices which involve a risk from ionising radiation emanating from an artificial source or from a natural radiation source in cases where natural radionuclides are	

European Directives and International Conventions		
Standards/Regulation	Summary	Relevance
	<p>processed in view of their radioactive, fissile or fertile properties.</p> <p>It also applies to further work activities which involve the presence of natural radiation sources and lead to a significant increase in the exposure of workers or members of the public.</p>	
Financial Standards		
PR 1: Environmental and Social Appraisal and Management	<p>PR1 outlines the client's responsibilities in the process of appraising, managing and monitoring environmental and social issues and in particular:</p> <ul style="list-style-type: none"> <li>• To identify and assess environmental and social impacts and issues, both adverse and beneficial, associated with the project;</li> <li>• To adopt measures to avoid, or where avoidance is not possible, minimize, mitigate or offset/compensate for adverse impacts on workers, affected communities, and the environment;</li> <li>• To identify and, where feasible, adopt opportunities to improve environmental and social performance;</li> <li>• To promote improved environmental and social performance through a dynamic process of performance monitoring and evaluation.</li> </ul>	Yes, the ESIA will need to address PR1.
PR2: Labour and Working Conditions	<p>PR2 outlines the client's responsibilities in the management of labour and working conditions. It requires clients to adopt/maintain human resource policies and to document and communicate to all workers their working conditions and terms of employment. It makes specific provisions that need to be incorporated into workers' terms of employment and sets out explicitly how the requirements should be applied to non-employee and supply chain workers.</p>	Yes, workers will be employed as part of the construction and operation of the Project, so PR2 will need to be addressed.
PR3: Pollution Prevention and Abatement	<p>PR3 aims to avoid or minimise pollution directly arising from projects in order to avoid or minimise impacts on human health and the environment. It also seeks to assist clients in identifying project-related opportunities for energy and</p>	Yes, the Project is likely to release emissions to air either directly (e.g. tri-generation and boiler systems) or indirectly (e.g. through traffic) and potential pollution from wastes.

European Directives and International Conventions		
Standards/Regulation	Summary	Relevance
	resource efficiency improvements and waste reductions, and to promote the reduction of project-related greenhouse gas emissions.	
PR4: Community Health, Safety and Security	PR4 aims to avoid or minimise risks to and impacts on the health and safety of the local community during the project life cycle from both routine and non-routine circumstances. It also seeks to ensure the safeguarding of project-related personnel and property.	Yes, the Project has the potential to impact on local communities near to the site.
PR5: Land Acquisition, Involuntary Resettlement and Economic Displacement	PR5 aims to avoid, or at least minimise, involuntary resettlement wherever feasible by exploring alternative project designs. It aims to mitigate adverse social and economic impacts from land acquisition or restrictions on use of and access to land, and to improve or restore the livelihoods and standards of living of displaced persons to pre-project levels.	The site had 5 Syrian refugees camping and sorting recyclable trash. These refugees left the site before excavation commenced through circumstances unconnected with the Project. PR5 was considered in proposing potential livelihood restoration options, in the event that the refugees had remained on the site. Displacement due to the Project is not anticipated at any future stage.
PR6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	PR6 applies to projects in all types of habitats, irrespective of whether they have been disturbed or degraded previously, or whether or not they are protected or subject to management plans. PR6 establishes various principles to protect and conserve biodiversity and to avoid, minimise and mitigate impacts on biodiversity and offset significant residual impacts, with the aim of achieving no net loss or a net gain of biodiversity.	Yes, the Project has the potential to impact on ecology, biodiversity and associated resources.
PR7: Indigenous Peoples	PR7 applies when a project is likely to affect Indigenous Peoples. It aims to avoid adverse impact of projects on the lives and livelihoods of Indigenous Peoples' communities, or where avoidance is not feasible, to minimise, mitigate or compensate for such impacts. It aims to ensure that Indigenous Peoples rights, aspirations, cultural and livelihoods are recognised Indigenous Peoples benefit from projects in a culturally appropriate manner.	This PR is unlikely to be relevant to the Project, as there are unlikely to be Indigenous Peoples within the Project's area of influence.

European Directives and International Conventions		
Standards/Regulation	Summary	Relevance
PR8: Cultural Heritage	PR8 applies when a project is likely to affect irreplaceable cultural heritage (irrespective of whether or not it has been legally protected or previously disturbed). It aims to support the conservation of cultural heritage in EBRD-financed projects, to protect cultural heritage from adverse impacts of project activities, to promote equitable sharing of benefits from the use of cultural heritage in business activities and to promote the awareness of and appreciation of cultural heritage where possible.	This PR could be relevant to the Project, depending on the presence of cultural heritage assets in the site and its surrounds.
PR9: Financial Intermediaries	PR9 establishes the mechanism through which the Bank can promote its sustainable development objectives in its Financial Intermediaries investments.	This PR is unlikely to be relevant, as Financial Intermediaries are not expected.
PR10: Information Disclosure and Stakeholder Engagement	PR10 outlines a systematic approach to stakeholder engagement and requires that clients: <ul style="list-style-type: none"> <li>• Identify people or communities that are or could be affected by the project, as well as other interested parties;</li> <li>• Ensure that such stakeholders are appropriately engaged on environmental and social issues that could potential affect them through a process of information disclosure and meaningful consultation;</li> <li>• Maintain a constructive relationship with stakeholders on an ongoing basis through meaningful engagement during project implementation.</li> </ul>	Yes, stakeholder engagement and information disclosure will be undertaken as part of the Project.
Sub-sectoral Environmental and Social Guidelines: Health Services and Clinical Waste Disposal	The Sub-Sectoral Environmental and Social Guidelines for Health Services and Clinical Waste Disposal provide guidance relating to the environmental impacts of health care provision associated with energy use, water use, procurement and waste generation (clinical and non-clinical waste). The guidelines focus particularly on clinical waste which constitutes a unique and significant risk in the health sector.	Yes, the project will need to consider these guidelines as clinical waste and construction waste are but significant issues for the Project.
International Finance Corporation (IFC) Performance Standards (PS)		
PS1: Assessment and Management of Environmental and Social Risks and	PS1 aims to ensure that project-related environmental and social risks and impacts are evaluated and that an appropriate	Yes, the ESIA will need to address PS1.

European Directives and International Conventions		
Standards/Regulation	Summary	Relevance
Impacts	hierarchy of mitigation is incorporated, where avoidance is not possible. It aims to promote improved environmental and social performance of clients through the effective use of management systems, and to ensure that the grievances from Affected Communities and other stakeholders are responded to and managed appropriately throughout the project's lifetime.	
PS2: Labour and Working Conditions	PS2 seeks to promote the fair treatment, non-discrimination and equal opportunity of workers and to protect workers (including vulnerable categories e.g. children and migrants). It seeks to establish, maintain and improve worker-management relations and to promote compliance with national employment and labour laws.	Yes, workers will be employed as part of the construction and operation of the Project, so PS2 will need to be addressed.
PS3: Resource Efficiency and Pollution Prevention	PS3 aims to avoid or minimise adverse impacts on human health and the environment by avoiding or minimising pollution from project activities. It seeks to promote more sustainable use of resources, including energy and water, and to reduce project-related greenhouse gas emissions.	Yes, the Project is likely to release pollutants either directly (eg tri-generation or boiler systems) or indirectly (eg through traffic, wastes etc).
PS4: Community Health, Safety and Security	PS4 aims to ensure that adverse impacts on the health and safety of the Affected Community are anticipated and avoided throughout the project lifetime. It seeks to ensure that the safeguarding of personnel and property is carried out in accordance with relevant human rights principles and in a manner that avoids or minimises risks to Affected Communities.	Yes, the Project has the potential to impact on local communities near to the site.
PS5: Land Acquisition and Involuntary Resettlement	PS5 aims to avoid, and when avoidance is not possible, minimise displacement by exploring alternative project designs. It aims to anticipate and avoid adverse social and economic impacts from land acquisition or restrictions on land use by providing compensation and ensuring implementation of resettlement activities, where necessary. It seeks to improve, or restore, the livelihoods and standards of living of displaced persons.	The site is currently vacant and resettlement and economic displacement are unlikely to occur as a result of the Project.

European Directives and International Conventions		
Standards/Regulation	Summary	Relevance
PS6: Biodiversity Conservation and Sustainable Management of Living Resources	PS6 seeks to protect and conserve biodiversity and to maintain the benefits from ecosystem services. It aims to promote the sustainable management of living natural resources through the adoption of practices that integrate conservation needs and development priorities. It specifies that the client will not implement any project activities in areas of critical habitat unless: there are no other viable alternatives within the region; the project does not lead to measurable adverse impacts, or a net reduction in the global and/or national/regional population of any critically endangered or endangered species; and a robust, appropriately designed, and long-term biodiversity monitoring and evaluation program is integrated into the client's management program.	Yes, the Project has the potential to impact on ecology, biodiversity and ecosystem services. The potential for critical habitats to be affected would need to be determined.
PS7: Indigenous Peoples	PS7 seeks to ensure that the development process fosters full respect for human rights, dignity, aspirations, culture and natural resource-based livelihoods of Indigenous Peoples. It aims to anticipate and avoid adverse impacts of projects on communities of Indigenous Peoples, or when avoidance is not possible, to minimise and/or compensate for such impacts; and to promote sustainable development benefits and opportunities in a culturally appropriate manner.	This PS is unlikely to be relevant to the Project, as there are unlikely to be Indigenous Peoples within the Project's area of influence.
PS8: Cultural Heritage	PS8 aims to protect cultural heritage from the adverse impacts of project activities and to support its preservation. It also seeks to promote the equitable sharing of benefits from the use of cultural heritage.	This PS could be relevant to the Project, depending on the presence of cultural heritage assets in the site and its surrounds.
IFC Environmental, Health and Safety (EHS) Guidelines	The IFC EHS Guidelines are technical reference documents, providing general and industry-specific examples of Good International Industry Practice (GIIP). They are used by the IFC as part of the appraisal of projects under the IFC's project evaluation mandate. The IFC EHS Guidelines represent the performance standards normally considered acceptable by the IFC, and generally considered to be achievable in new facilities at reasonable cost by existing technology. When host	Yes, the Project will need to take into account the relevant IFC Guidelines and in particular, the Environmental, Health and Safety Guidelines for Health Care Facilities.



European Directives and International Conventions		
Standards/Regulation	Summary	Relevance
	country regulations differ from the levels and measures presented in the EHS Guidelines, the IFC recommends that projects should achieve whichever is more stringent.	
<b>EIB Environmental and Social Standards (2013)</b>		
Assessment and Management of Environmental and Social Impacts and Risks	The standard underscores the importance of managing environmental and social impacts and risks throughout the life of a project through the application of the precautionary principle. The standard's requirements allow for the development of an effective environmental and social management and reporting system that is objective and encourages continual improvements and developments. The standard includes requirements for stakeholder engagement and disclosure throughout the life of the project.	Yes, the ESIA will need to address this standard.
Pollution Prevention and Abatement	The objective of the standard is to avoid and minimise pollution from operations. It outlines a project-level approach to resource efficiency and pollution prevention and control in line with best available techniques and internationally disseminated practices.	Yes, the Project is likely to release pollutants either directly (e.g tri-generation or boiler systems) or indirectly (e.g. through traffic, wastes etc).
EIB Standards on Biodiversity and Ecosystems	The standard outlines the approach and measures the promoter should take to protect and conserve all levels of biodiversity. The standard applies to all habitats (marine and terrestrial) whether or not previously disturbed or legally protected.	Yes, the Project has the potential to impact on ecology, biodiversity and ecosystem services.
EIB Climate-Related Standards	This standard specifies that EIB financed projects must be aligned with EU climate policy and specifies commitments to a climate-friendly portfolio and promoting the adoption of energy efficient projects.	Yes, the Project has a tri-generation unit and energy efficiency has been considered.
Cultural Heritage	The objective of this standard is to recognise the significance of tangible and intangible cultural heritage, ensuring that all cultural heritage is protected and conserved.	Although no cultural heritage has been found on the Project site, this standard is still relevant in the event of chance finds.
Involuntary Resettlement	The objective of this standard is to avoid, or at least minimise, project-induced resettlement and avoid / prevent forced evictions. It sets out measures to ensure resettlement measures are designed and implemented through meaningful	Yes, there were five Syrian refugees on site before excavation commenced and this standard was relevant at that stage, in considering potential livelihoods restoration.

European Directives and International Conventions		
Standards/Regulation	Summary	Relevance
	consultation.	
Rights and Interests of Vulnerable Groups	This standard sets out to avoid, minimise, or otherwise mitigate and remedy potential harmful effects to vulnerable individuals or groups whilst seeking that vulnerable groups benefit from projects financed by EIB. This standard also incorporates the principles of public consultation and participation, indigenous peoples and free, prior and informed consent (FPIC).	Yes, the social assessment has identified vulnerable groups including Syrian refugees, who need to be considered by the Project. Provisions for indigenous peoples will not be relevant for this Project.
Labour Standards	The objective of this standard is to ensure non-discrimination and fair and equal treatment and opportunity at work, promote freedom of association and collective bargaining, ensure and maintain a sound worker-management relationship and promote compliance with Core ILO Labour Standards with respect to child labour, forced labour, equal opportunity and freedom of association. It considers first-tier suppliers and primary contractors. The Labour Standard also specifies a clear human rights policy and specifies provisions for sound labour practices. This also specifies that labour assessment and labour audits may be required depending on the significance and magnitude of labour related risks and impacts.	Yes, this is applicable for the life of the project considering the presence of vulnerable groups and the need for a construction workforce and large operating workforce.
Occupational and Public Health, Safety and Security	This standard promotes and protects the health and safety of employees at work throughout the project life cycle by ensuring a safe, healthy, hygienic and secure working environment. It also provides guidance for grievance and recourse to remedy.  This standard also specifies provisions for security management and compliance with the Voluntary Principles on Security and Human Rights, the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials, the UN Code of Conduct for Law Enforcement Officials and the International Code of Conduct on Private Security Providers.	Yes, construction work must be undertaken in a way that protects worker safety. Worker accommodation must promote staff wellbeing. Workers must also be aware of the grievance mechanism and have recourse to remedy. The Project will also be making use of private security during construction and operation.

European Directives and International Conventions		
Standards/Regulation	Summary	Relevance
Stakeholder Engagement	This standard sets out a process for maintaining constructive dialogue between the project promoter and stakeholders and other interested parties throughout the project life cycle.	Yes, the project is required to engage with a wide range of stakeholders.
EIB Environmental and Social Standards outlined in the Environmental and Social Handbook	This document brings together the EIB Environmental and Social Standards described above along with EIB Environmental and Social Practices and Procedures. The EIB has an explicit human rights-based approach across all its standards, founded on the European Charter of Fundamental Rights.	Yes, this handbook provides guidance for the Project on a wide range of environmental and social issues.
Corporate Standards		
ESMS	<p>The SPV has already developed the following management plans as part of the ESMS for construction. Management Plans and other relevant documentation include:</p> <ul style="list-style-type: none"> <li>• Health and Safety Management Plan</li> <li>• Emergency Preparedness and Response Plan</li> <li>• Subcontractor Contact Details, Health Safety Environment Documentation and Occupational Health and Safety Authorisation Follow-up Chart</li> <li>• Environmental Leakage Management</li> <li>• Workers' Accommodation Facility Control List</li> <li>• Gaziantep IHC Environmental Monitoring Report Format</li> <li>• Gaziantep IHC Environmental Monitoring Follow-up Chart</li> <li>• Noise Control and Monitoring Plan</li> <li>• Human Resources Management Plan</li> <li>• Grievance Management Plan</li> <li>• Grievance Register and Follow-up Chart</li> <li>• Protection and Security Plan</li> <li>• Traffic Management Plan</li> <li>• Archaeological Chance Finds Management Procedure</li> <li>• Accidents Prior Notification Form</li> <li>• Accident/Incident Investigation Procedure</li> </ul>	

European Directives and International Conventions		
Standards/Regulation	Summary	Relevance
	<ul style="list-style-type: none"> <li>• HSE Award System Implementation Procedure</li> <li>• First Aid Procedure</li> <li>• Corporate Social Responsibility Policy</li> <li>• Human Rights Policy</li> <li>• Employee Grievance Form</li> <li>• Questionnaire for Employee Satisfaction</li> <li>• HSE Management Handbook</li> <li>• List of waste types and method of disposal</li> <li>• Waste Management Procedure</li> <li>• HSE and Quality Policies</li> <li>• Safety instructions for storage, transportation and usage of hazardous materials</li> <li>• Annual Training Plan</li> <li>• Contractor's Written Contract regarding the Legislation on Occupational Health and Safety and Social Security</li> <li>• Environmental Health and Safety CVs and Certificcates</li> <li>• Induction Presentation</li> </ul>	