

REPORT

İspir Copper and Zinc Mine Project

Environmental and Social Impact Assessment (ESIA)

Executive Summary

Submitted to:

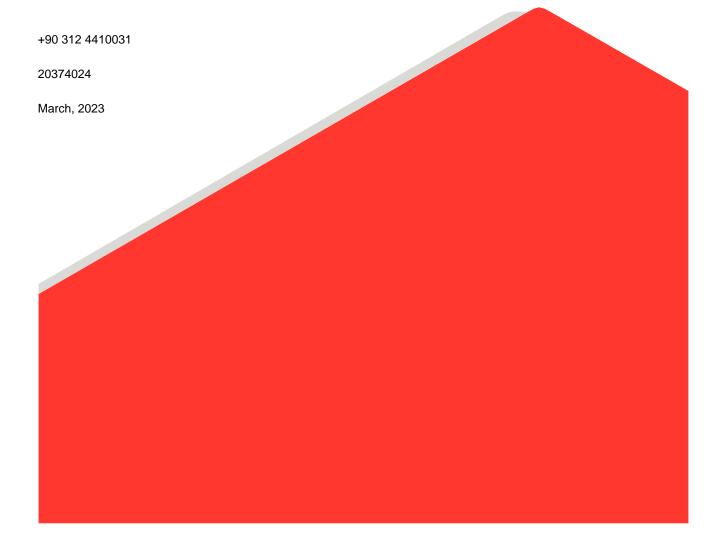
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Executive Summary

Demir Export A.Ş. (Demir Export), the Owner, retained WSP Golder (Golder) to prepare the Environmental and Social Impact Assessment (ESIA) studies to comply with the national and international requirements for the İspir Copper and Zinc Mine Project (Project) to have been operated in İspir, Erzurum, Turkey.

Demir Export is planning to extract and enrich copper and zinc ore by open pit mining method in the field with Operation License Number 88604 and MTA permit in Ulutaş Mahallesi, İspir District of Erzurum Province. The Project comprises an open pit copper and zinc mine and ore processing plant, Waste Rock Dump (WRD) and Tailings Storage Facility (TSF) including infrastructure and associated facilities within the mine license area numbered 88604 by combining licences numbered S:201200394, S:201200618, and S:201901620 in one single licence and MTA permit area (19.94 ha). The license has been assigned to Demir Export by the General Directorate of Mining Affairs under the Ministry of Energy and Natural Resources. However, only a portion of the open pit area is included within the General Directorate of Mineral Research and Exploration (MTA) permit area The Project has a total of 366.18 ha Environmental Impact Assessment (EIA) area, where 42.05 ha is open pit, 46.71 ha is WRD, and 38.05 ha is TSF.

Within the scope of the project, a total of 154,426 tons of copper concentrate of 25% and 305,044 tons of zinc concentrate of 52% are planned. The total life of the project has been determined as approximately 9 years. It is planned that the land preparation, construction and installation period will last approximately 2 years, the operation period 6 years and the closure period 1 year. The mineral exploration and drilling activities will continue in addition to operating activities. If new ore fields are detected during the continuation of mining activities in the field, the life of the project may be extended. In this case, necessary permits will be obtained within the framework of the relevant regulations.

The ESIA Report has been prepared by WSP Golder Türkiye for the following objectives:

- Identification and assessment of social and environmental impacts, both adverse and beneficial, in the Project's area of influence
- Evaluation of the main environmental and social risks and potential impacts of the Project
- Presentation of Environmental and Social Management Plan (ESMP), Environmental and Social Management System (ESMS), Stakeholder Engagement documentation, and grievance mechanism in line with the Equator Principles (EP) 4 and IFC Performance Standards (PSs)
- Description of the management, mitigation, monitoring and compensation measures, including the ESMS,
 the ESMP, and the thematic action or management plans
- Cumulative impact assessment (as required by the EP 4 and IFC PSs)
- Assessment of associated facilities.
- Main components of the assessment include:
 - The potential environmental and social impacts of the Project throughout the full life cycle
- A public consultation to ensure that local communities and other key stakeholders are informed of the Project and have an opportunity to express their opinions concerning the Project
- Proposed mitigation activities to minimize adverse environmental and social impacts

The nature and significance of residual impacts (those adverse impacts that occur after mitigation has been applied) and ongoing monitoring and management plans to address them;

The nature and significance of cumulative impacts

Based on the findings of the potential environmental and social impacts and risks of the projects were identified during that phase, the Project is categorised as Category A in accordance with IFC Sustainability Framework.

The potential environmental and social impacts and risks of the projects were identified based on the project screening information and the additional information collected during the inception and ESIA phase. These impacts and risks are:

- Site specific,
- Readily identifiable,
- Can be readily addressed by standard industry practice mitigation measures (as also detailed in the following sections), and
- Largely reversible.

An ESIA evaluates a project's potential environmental and social risks and impacts in its area of influence; examines project alternatives; and includes the process of mitigating and managing adverse environmental and social impacts throughout project implementation.

As a key step in the ESIA process; various studies have been conducted to collect information on the existing environmental and social baseline conditions. Apart from the desktop and relevant literature review the following activities were performed (along the entire route) for the collection of information on social and environmental baseline conditions.

- Air quality measurement activities were conducted at selected points along the Project route near surroundings,
- Ambient noise and vibration measurements were conducted at selected points along the Project route near surroundings,
- Surface water quality measurements were conducted at selected points along the Project route,
- Soil quality measurement activities were conducted at selected points along the Project route,
- Site visit was performed by WSP Golder Türkiye for the identification of environmental and social components of the impact assessment study,
- Site visit was performed by biodiversity experts for the identification of the biological components of the impact assessment study.

Impact Assessment Results

Main features of Current Situation	Potential impacts	Mitigation Measures
Geology and Geomorphol	ogy	
The Project Site is located in the Eastern Pontides in the Alpine Orogenic Belt on the Eastern Pontide Magmatic Arc which has developed with the northward subduction of the Neotethys along the southern part of the Sakarya Zone during the Late Cretaceous. In the Project Site and its vicinity, eight (8) stratigraphic units are distinguished.	Changes in the local morphology	 Worksite will be minimized to the smallest extent possible in order to meet Project's works and activities; The foundations' footprints and depths have been properly dimensioned; hence the excavations and the consequent physical-mechanical disturbances will be minimized; Construction site will be minimized to the smallest extent possible in order to meet Project's works and activities; The flattening and excavation operation will be minimized to the extent possible in order to limit the morphological disturbances; Part of the removed material will be re-used as fill at the Project Area, if it presents the suitable geotechnical characteristics, in order to limit the use of raw material. If technically necessary cut-slopes will be reinforced at critical locations with necessary measures (wire mesh, rock bolt, shotcrete, etc.) Surface water runoff will be diverted under control out of the Project Site to prevent effect of erosion. Rehabilitation works will be performed simultaneous to production activities in areas where the activities are completed. The rehabilitation works to be performed will rather aim at rehabilitating disturbed land to a shape that comes closest to its original shape and is in harmony with its environs in every aspect. The rehabilitation works to be performed under the İspir Project will be based on the principle of complete removal or at least minimization of all environmental risks and all elements that might jeopardize human health.

Main features of Current Situation	Potential impacts	Mitigation Measures		
		■ Temporary and permanent erosion control measures such as control of surface flows, minimization of bare lands, storage of stripped topsoil at adequate angles of inclination, collection of surface water flows at storage sites, creation of interception channels, and vegetation of storage areas will be taken at the Project Site in order to minimize the loss of soil and erosion as well as perform sedimentation control during mining operations and also, after completion of rehabilitation works subsequent to completion of mining activities.		
Seismicity				
The Earthquake Hazard Map of the Project Site according to the Turkey Earthquake Hazard Map is given in Figure 18. The earthquake ground motion level (DD-2) is 10% probability of exceedance (repetition period 475 years) in 50 years, and the ground type ZA was taken into consideration. According to the Map, for the 475-year return period Peak Ground Acceleration (PGA) was calculated as 0.299 g.	In the Project, impact screening and pre-mitigation measures during catastrophic earthquake events were considered in engineering design stage.	 Periodic visual inspection at specific site locations such as cutslopes and mine area; Installation of monitoring instruments as prisms, radar system, etc. 		
Hydrology and Surface Water Quality				
Project Site is located in Çapan (Ovit) sub-basin of the Çoruh River Basin. The sub-basin covers an area of about 25 km ² The annual average precipitation of the Çoruh Basin is 480 mm, and the basin water potential is approximately 6.5 billion m ³ per year ¹ .	Hydrological Change Surface Water Run-off Surface Water Pollution	Consultations will be held with DSI and SYGM regarding the hydrological studies and surface water quality and any additional studies will be conducted upon the opinions of these institutions prior to the Construction Phase.		

¹ Türk Mühendislik Müşavirlik Ve Müteahhitlik A.Ş. (TÜMAŞ), 2020, Çoruh Havzası Taşkın Yönetim Planı Stratejik Çevresel Değerlendirme Raporu, Tarım ve Orman Bakanlığı, Su Yönetimi Genel Müdürlüğü, Taşkın ve Kuraklık Yönetimi Daire Başkanlığı, Taşkın Yönetimi Şube Müdürlüğü, Ankara.

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vi

Main features of Current Situation	Potential impacts	Mitigation Measures
Following the expansion of the Project's scope in 2021, eleven (11) monitoring/sampling locations were added by Golder and the monitoring programme was updated. Within the scope of the EIA carried out by Golder in May 2021 to February 2022, samples were taken from sixteen (16) out of seventeen (17)		■ During the Construction Phase, the surface drainage and site runoff, particularly in heavy rainy seasons will be properly managed by constructing temporarily or permanent channels which were designed to manage maximum flow capacity against the flood risk.
surface water points (namely ISW01 to ISW17) because one (1) water point (namely ISW11) could not be monitored due to accessibility constraints		Surface improvement will be considered during the Construction Phase such as paving or spreading gravel to the road surface (unpaved areas).
		Regular maintenance of vehicles and machinery/equipment will be undertaken to ensure that leakages of oil/fuel or any other hazardous material is prevented.
		Use of machinery/vehicles will be strictly limited within the construction sites and along the appropriate access roads.
		Impervious (concrete etc.) surfaces will be designated for the refuelling of the machinery/vehicles, if it is not possible according to the nature of the Project, all refuelling tankers and all heavy machinery used at the Site will have an iron plate trays, and these trays will be placed under the pipe connection points to prevent accidental leakage to the soil during refuelling operations.
		■ During the repair and maintenance of the vehicles and machinery/equipment (if needed) necessary spill control measures will be taken with secondary containment measures;

Main features of Current Situation	Potential impacts	Mitigation Measures
		Portable spill containment and clean-up materials (spill kits) will be made available and easily accessible at the construction site, instructions on how to use spill containment and clean-up materials will be included in the kits.
		Training on spill response, use of containment and clean-up material (spill kits) will be provided to works (including the subcontractor workers).
		Adequate and properly maintained tanks, paved ground, spill containment materials and proper secondary containment systems with sufficient volume will be provided for fuel/oil storage and for the storage of other fluids and hazardous substances.
		Polluted water (if generated as a result of accidental leakages) will be properly collected or managed to prevent mixing with any water body.
Hydrogeology and Ground	lwater Quality	
The Project Site is located within the drainage network of Ovit Stream. Precipitation is the only source of groundwater recharge. The surface runoff occurs as a result of precipitation and snowmelt and directly discharges towards the Ovit Stream due to the low hydraulic conductivity of the hydrostratigraphic units. Within the scope of the EIA carried out by Golder in between May 2021 - February 2022, in situ measurements were conducted in fourteen (14) locations at the Project Site and its vicinity. The results of Q, T,	Hydrogeological change Groundwater pollution	■ During the Project activities, "Regulation on the Protection of Groundwaters Against Pollution and Deterioration", which enter in force after being published in the Official Gazette dated 07.04.2012 and numbered 28257 (Amended Official Gazette dated 28.10.2017 and numbered 30224). Provisions specified in the "Regulation on the Protection of Drinking Water Basins", which enter in force after being published in Turkey, will be complied with and the measures

Main features of Current Situation	Potential impacts	Mitigation Measures
pH, EC, ORP and DO that are measured directly (in situ) within the water body are given in Table 25. At all locations pH values were measured above 7 and it shows that the groundwater resources of the Project Site considered alkaline (basic).		specified in accordance with these regulations will be taken. In the WRD to be built within the scope of the Project, the provisions regarding the permeability and waste disposal in the 5th and 12th articles of the "Regulation on the Protection of Groundwater against Pollution and Deterioration" will be complied with, and all the necessary sealing measures to prevent the pollution of groundwater will be taken. Legal and technical measures have been taken to ensure that the amount and quality of water will not be adversely affected due to the use of groundwater within the scope of the activities to be carried out, and all kinds of water needs of the settlements will be met if affected.
		■ Within the scope of the legislation to be complied with within the scope of the project, it is committed to comply with the Law No. 167 on Groundwater and all applicable legislation within the framework of the Protection of Groundwater.
		■ In case that any drinking water protection announcement is made in accordance with the provisions of the "Communiqué on the Determination of Protected Areas of Aquifers and Sources from which Drinking Water Supply" entered into force by being published in the Official Gazette dated 10.10.2012 and numbered 28437 by DSI, it is committed to comply with the conditions of the

Main features of Current Situation	Potential impacts	Mitigation Measures
		announcement without claiming any rights.
Soil and Subsoil		
Soil samples were collected in May-June 2021 to determine if there are any pollution indicators or sources of pollution in the Project Area and its immediate surroundings.	topsoil and lower soil removal soil contamination the occupation of land	the Project will comply with relevant legal and project safety requirements to avoid leakages from hazardous materials (chemicals, liquids etc.) storage facilities on-site;
According to the Table 33, the measurement results of all parameters except Arsenic and Chromium are below the defined limit values. The fact that Arsenic and Chromium are higher than		regular maintenance of vehicles and machinery/equipment will be undertaken to ensure that leakages of oil/fuel or any other hazardous material is prevented;
the defined limits does not always mean that the area is under an influence. ²		 use of machinery/vehicles will be strictly limited within the construction sites and along the appropriate access roads;
		impervious (concrete etc.) surfaces will be designated for the refuelling of the machinery/vehicles, if it is not possible according to the nature of the Project, all refuelling tankers and all heavy machinery used at the Site will have an iron plate trays, and these trays will be placed under the pipe connection points to prevent accidental leakage to the soil during refuelling operations;
		maintenance of the vehicles and machinery/equipment (if needed) will be conducted in designated area where there is impermeable surface (concrete floor etc.) and if needed secondary containment system present;

Helvacı, Cahit, "Doğada bor ve arsenik elementlerin ilişkisi", Dokuz Eylül Uni., Jeloji Mühendisliği Bölümü., Uluslararası Katılımlı Tıbbi Jeoloji Sempozyumu, 2008

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Main features o Situation	f Current	Potential impacts	Mit	igation Measures
			•	portable spill containment and clean-up materials (spill kits) will be made available and easily accessible at the construction site, instructions on how to use spill containment and clean-up materials will be included in the kits;
			•	training on spill response, use of containment and clean-up material (spill kits) will be provided to works (including the subcontractor workers);
			•	adequate and properly maintained tanks, paved ground, spill containment materials and proper secondary containment systems with sufficient volume will be provided for fuel/oil storage and for the storage of other fluids and hazardous substances to prevent loss into the soil;
			•	wastewater flows from any field activities (i.e. excavations, drillings, re-fuelling and vehicle/equipment washing) will be properly managed;
			•	polluted water (if any generated as a result of accidental leakages) will be properly collected or managed to prevent the topsoil/soil pollution;
			•	if some construction areas need to be located onto vegetated and uncontaminated land, in order to reduce loss of topsoil due to project actions during the construction phase, the topsoil will be temporarily removed and properly stockpiled to be used for landscaping in the stripped areas upon completion of the works as required by the Regulation on Excavation, Construction and Demolition Wastes issued on

Main features of Current Situation	Potential impacts	Mitigation Measures
		March 18, 2004 at Official Gazette no.25406;
		if some vegetated/uncontaminated land is expected to be permanently removed (e.g. onto the new buildings' footprints and the roads), the topsoil should be properly stored (as required by the Regulation on Excavation, Construction and Demolition Wastes issued on March 18, 2004 at Official Gazette no.25406) and re-used for reclamation of nearby artificial sites;
Air Quality		
PM10, and PM2.5 measurement values are in compliance with Project standards.	Dust emissions to the atmosphere	 use of water suppression at working sites and transportation routes, especially in hot-dry seasons,
		 loads in all trucks transporting dust- generating materials will be sprayed with water to suppress dust,
		 use of water suppression for control of loose materials on paved or unpaved road surfaces,
		 use of dust suppression techniques, such as covers, water suppression, or increased moisture content for open materials storage piles,
		speed reduction for the means travelling inside the Project site.
		 activities will be conducted trying to use the minimum required number of means at the same time,
		 vehicle engines and other machinery shall be kept turned on only if necessary, avoiding any unnecessary emission,
		 all equipment and machinery must be maintained for compliance with standards and technical regulations for the protection of the

Main features of Current Situation	Potential impacts	Mitigation Measures
Noise and vibration		 environment and have appropriate certification, machinery and equipment shall be periodically checked and maintained to ensure their good working condition. Monthly monitoring campaign will be conducted during the construction and operation phases at baseline locations
According to the measurement results, it is seen that all baseline noise levels for day period (7:00-22:00) are lower than both national and international standards. However, measured noise levels for night period (22:00-7:00) exceed the IFC noise limits at 4 measurement location. The conducted noise baseline measurement results are presented in Table 42 in the baseline section.	Emission of noise and vibration	 The sound power levels of the equipment / vehicles to be used will meet the standards given in the Regulation on Machinery Safety. Maintenance of all the equipment / vehicles will be periodically performed. In order to ensure occupational health and safety of the personnel during the project activities, the provisions of the Labor Law No. 4857 will be complied with, and appropriate personal protective equipment will be provided to the employees within the scope of the Occupational Health and Safety Law No. 6331 and its related regulations. Regular noise monitoring studies will be performed throughout the project lifetime. Additional location-specific measures will be defined in case of any complaint is received from the public or the noise monitoring results exceed the project standards. For the blasting-induced impacts following measures will be followed where possible: Homogeneous distribution of explosive materials in the rock with a balanced way by using holes of appropriate diameter and size,

Main features of Current Situation	Potential impacts	Mitigation Measures
		 Giving the appropriate load to the holes by calculating the appropriate hole geometry, Leaving at least the size of the hole-mirror (load) distance for stemming length and tightening the mouth using a suitable material, Selecting the appropriate hole geometry, suitable stemming length and explosive material, Application of delayed detonation method during blasting, Before drilling the holes, it will be checked whether there are geological defects, open joints, clay veins, fractures and dented zones in the mirror (on the front of the bench), and if there is a fault, less explosive material is placed in the hole or holes in the faulty section, Gradually charging the hole(s) or canceling the defective hole, In case the vibration limits for building safety are exceeded according to the vibration measurements, explosive material per hole will be decreased.
Traffic The list of all vehicles and equipment to be used in the project area during the construction phase of the project is given in Section 3.4.1, and the maximum number of trucks planned during the construction and operation periods of the project will be 25. The activities related to the construction phase will require the movement of trucks entering and leaving the project area for the transportation of machinery, equipment, construction material (e.g., concrete, building materials) and staff. According to the blasting calculation, the maximum flyrock distance is calculated as approximately 85 meters.	equipment (excavator, drill, loader, etc.) will be operated	 Traffic control methods will be implemented (eg, placing additional traffic signs, illuminating the signs, improving visibility). Traffic will be minimized in pedestrian areas and road crossings. Drivers will be informed about safety issues and it will be mandatory to comply with speed limits, especially in residential areas. It will be ensured that the vehicles are safe, and regular maintenance of vehicles and equipment will be carried out in order to reduce emissions and noise. It will be ensured that all the measures in question are applied to subcontractors and subcontractors. In particular, it will be ensured that the fuel systems and brake

Main features of Current Situation	Potential impacts	Mitigation Measures
		systems of the vehicles are regularly checked. The fuel systems of the vehicles will be constantly checked in accordance with the Exhaust Gas Emission Control Regulation. Regular health checks of drivers will be ensured.
Landscape and Visual		
The İspir Project site is located in the eastern Anatolia region of Turkey, approximately 22 km northwest of the İspir District in the north of the Erzurum Province. The nearest settlements to the İspir Project site are Ulutaş Village located approximately 500 m east of the Waste Rock Dump (WRD) site and Çayırözü Village located approximately 1000 m southeast of the open pit area. The Project site location has steep mountainous topography with the elevation between 2,000-2,600 m above the sea level. The Project site is located has a subalpine continental mountain climate where the winter is long and harsh, while summer is short and hot with the highest precipitation seasons of spring and summer.	Removal of vegetation (during construction phase), Introduction of new buildings/infrastructures (during construction phase), Increase of artificial surface (during construction and operation phase), Removal of buildings//infrastructures (during closure phase)	During the closure phase, Project Area will be re-contoured. Re-contoured areas will be enveloped with topsoil, and they will be re-planted with proper local species. Since the WRD area determined within the scope of the Project has a permanent structure, it will be closed with rehabilitation works. The aim of the closure works is to ensure the physical and chemical stability of the WRD area, to level the area, to rehabilitate it by covering it in harmony with the environment and to restore natural drainage. The plant species used in topographic forms reconstructed within the Project Area will differ from those used after rearrangement in common use areas. The use of long-rooted species, particularly those with roots extending vertically, which can affect physical and chemical stability of areas will be avoided at WRD. The species whose roots can go deeper, such as tree and shrub
There are no protected areas and any publicly available recognized landscape areas within the project area and its immediate surroundings.		species, will be preferred in common use areas such as roads; areas containing ponds; and its vicinity etc. In order to reduce negative visual impact of Project, planting trees around the mine site and road site will be done in the closure activities according to the

approved Rehabilitation Project and

Main Situat	features ion	of	Current	Potential impacts	Mitigation Measures
					Gradual Closure Plan during legal EIA Process. The restoration works to be carried out will be aimed at restoring the degraded land as close as possible and ensuring that it is compatible with its environment in all respects.

Biological Components

The Project terrestrial LSA is located at elevations between 11,975 m and 2,844 m a.s.l. within the "Northern Anatolian Conifer and Deciduous Forests (PA0515)" ecoregion, which is situated south of the Black Sea coastal zone and characterized by mountainous landscape and intact forest cover.

The Project LSAs are not located within any protected areas, as per IFC PS6 definition. The closest protected areas are Vercenik Mountain Wildlife Development Field and the Kaçkar Mountains National Park, situated at about 11 km and 14 km north of the LSAs respectively (Figure 72).

However, the LSAs fell within the "Eastern Black Sea Mountains" (DKD005) Key Biodiversity Area (KBA), Important Bird Area (IBA) and Important Plant Area (IPA) which is described below, and it is situated at about 11 km from the "Coruh Valley" KBA, IBA and IPA, which is located on the migration path of many predatory birds passing through Turkey (Figure 72).

(i) Threatened habitats

Habitats considered under pressure by national, regional or international assessments were considered for this criterion. This includes EUNIS habitats listed as Vulnerable (VU) in the "European Red List of Habitats" were also considered.

The EUNIS habitats identified are not considered threatened (VU, EN or CR) according to the "European red list of habitats". Therefore, no PBF is expected to be present in the LSA according to this criterion.

(ii) Vulnerable species

All the species listed as having Vulnerable (VU) conservation status according to global IUCN criteria were considered. In the absence of a global IUCN assessment (e.g. Not Evaluated NE, or Data Deficient DD) local assessments were considered (e.g. Turkish Red Data Book).

As a result, 10 species were identified as potentially triggering CH based on this criterion. These species include:

- 4 butterfly species;
- 1 amphibian species;
- 1 reptile species;
- 2 bird species; and
- 2 mammal species.

A list of mitigation measures is defined for Project phases within the scope of ESIA.

Social Components

According to preliminary analysis and desktop studies, 4 settlements were determined to be affected by the Project based on the acquisition of the pasture lands, construction phase environmental impacts, influx, economy and the community health and safety impacts.

The main impact factor on the population change is the migration of the non-local Project workers in case of the non-availability of the local workforce in social area of influence including Ulutaş, Çayırözü, Moryayla, Özlüce

- Unqualified workers will be hired locally where the availability of the local workforce,
- In case of the recruitment of the nonlocal workers, they should be accommodated in İspir central to not create a pressure on the

Main features of Current Situation	Potential impacts	Mitigation Measures
The settlements in the social area of influence that was consulted in the scope of community level surveys were; Ulutaş, Çayırözü, Moryayla and Özlüce. Community level surveys were performed with the mukhtars and assistance of Mukhtars. Secondary Data was obtained from National institutions including; ministries, research institutes, universities, national and local censuses, ministries, web-based published reports, assessment reports of local and national NGOs and Project specific documents. According to the information provided by Demir Export the majority of the lands required for the Project are the pasture lands. However, there is an ongoing court case for the land in a close vicinity to subcontractor area with the size of 154973,88 m². During the personalization process of the lands, the subject land was recorded as the Municipal lands and the users of the lands applied to court for the title deed. The court process for the land sized 154973,88 m² is ongoing and the acquisition of the private lands will be determined after the result of the court. In case of the determination of the private owners and users of the lands required for the Energy Transmission line a livelihood restoration plan will be required.	neighbourhoods, İspir District and Erzurum province.	existing infrastructure and services of Ulutaş and Çayırözü, A code of conduct will be prepared and implemented, Cultural awareness training will be provided to nonlocal Project workers, A grievance mechanism will be implemented that also provides local people to raise anonymous grievances especially for the gender-based violence, Continuous engagement will be conducted with the neighbourhood Mukhtars, Municipalities, local schools and the health services to discuss and monitor the influx impacts and necessary actions will be applied in case of any pressure. Equal payment for the equal jobs will be provided to local and nonlocal labor force, A bank account will be provided to workers and payment will be provided through the accounts, Workers Accommodations are designed in compliance with Workers' accommodation: processes and standards A guidance note by IFC and the EBRD (2009). The mukhtars of the villages and the neighbourhoods were informed about the recruitment opportunities of the Project (announcements, banners) to reduce the requirement of the nonlocal labor force, Where applicable, vocational trainings will be provided to local people, to maximize to local labor force, In total 12 trainings are provided to the Project employees and as of September 2022 total of 220 people employed by Demir Export and its subcontractors received training. Training minutes and visuals of trainings were recorded. Training plans continue according to the recruitment processes. Following trainings are provided to the employees; Social Impact, Cultural awareness

Main features of Current Situation	Potential impacts	Mitigation Measures
		■ Grievance Management

Environmental and Social Management System

The Environmental and Social Management System (ESMS) will be implemented (for both construction and operation phases) to ensure that the Project:

- complies with all applicable Turkish legislation as well as relevant IFC guidelines provided in this report;
- implements Good International Industry Practices (GIIP) to minimize potential environmental and social impacts during the construction, operation and decommissioning phases;
- is executed in compliance with the commitments addressed in this report for the minimization of potential environmental and social impacts;
- works in accordance with high standards of safety;
- cares for the protection of own employees and public;
- promotes its policies through training, supervision, regular reviews and consultation;
- generates local socio-economic benefits by using local and regional labour forces;
- engages and communicates with the local community and other stakeholders through a stakeholder engagement programme.

The minimum requirements of an ESMS have been defined and will be established for the project in order to mitigate the risks associated with;

- Environmental aspects
- Labour and occupational health and safety Issues
- Community Health & Safety aspects
- Stakeholder management and social aspects (including grievances)
- Land acquisition and livelihood management
- Waste Management