

Environmental and Social Assessment of Autoport Liman İşletmeleri A.Ş.

Non-Technical Summary



February 2026

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1. Project Description

The “Autoport Marine Terminal Modernization and Expansion Project” (Project) is planned to be constructed to increase the existing port capacity in the coastal area of Arpalık locality, Sepetlipınar Mahallesi, Başiskele District, Kocaeli Province. Autoport is Turkey's first “automotive specialized” port, built to meet the industry's need for a specialized port. Autoport has served the country and its region for many years and has made and continues to make economic contributions with the added value it creates.

Başiskele District, where the Project area is located, is surrounded by İzmit Bay and İzmit District to the north, Bursa Province to the south, Kartepe District and Sakarya Province to the east, Gölcük District and Yalova Province to the west. Figure 1-1 shows the Project area's location within the country and region. **Hata! Başvuru kaynağı bulunamadı.** shows Başiskele District and its immediate surroundings. **Hata! Başvuru kaynağı bulunamadı., Hata! Başvuru kaynağı bulunamadı.** and Figure 1-2 show satellite images, photographs of the project area, its immediate surroundings.

Autoport has been reorganized to serve primarily as an automobile terminal in light of the country's and region's growing export potential and transportation requirements. Apart from the Ford plant, there are several automotive factories in the region, such as Hyundai, Toyota in Sakarya, Otokar, Turkish Tractor, Fiat-Karsan-Renault in Bursa, etc., and these factories export a large part of their production. Specialized vessels are used for vehicle shipment, which load and unload around 4,000 cars on average on scheduled voyages.

Serving numerous manufacturers and distributors for both imported and exported goods in the region, Autoport provides Roll-on/Roll-off (Ro-Ro) handling, warehousing, and integrated terminal management services for automobiles as well as for general cargo containing specific products (i.e., forestry, iron, and steel products) and project cargo for heavy and out-of-gauge freights (e.g., wind and gas turbines, factory equipment, and construction materials).

The Marmara Sea and Islands, where the Project area is located, was declared a Special Environmental Protection Area by the Presidential Decree dated November 4, 2021 and numbered 4758. Article 109 of the Presidential Decree No. 1 With Article 109 of the Presidential Decree No. 1; "(1)/b) To determine the procedures and principles regarding the determination, registration, approval, amendment and announcement of natural assets and natural protected areas and special environmental protection zones, to determine and register the boundaries of these areas, to manage and ensure the management of these areas" duties and powers have been assigned to the General Directorate of Protection of Natural Assets of the Ministry of Environment, Urbanization and Climate Change.

An Environmental and Social Assessment (ESA) was undertaken for the European Bank for Reconstruction and Development (the “EBRD”) and the International Finance Corporation (“IFC together referred to as “Lenders”) that are considering providing financing to Autoport for the project expansion. The objective of the Assessment has been to identify and assess the potentially significant existing and future adverse environmental and social impacts associated with the current operations and the expansion project of the port, confirm project categorisation

in line with the ESP 2019, and IFC Sustainability Framework (2012); assess compliance with applicable laws and the EBRD ESP and PRs, IFC Performance Standards (PS) (2012) and adoption of GIIP as reflected in WBG EHSs; determine the measures needed to prevent or minimise and mitigate the adverse impacts, and identify potential environmental and social opportunities, including those that would improve the environmental and social sustainability of the Project and/or the associated current operations and/or those that could qualify for EBRD Green Economy Transition (GET). This Non-Technical Summary (NTS) document has been prepared to describe the key findings of the completed environmental and social studies and to summarise what is known about other topics that are or will be addressed in the detailed design and any additional studies that are to be prepared for the project by Autoport in line with national regulatory requirements.

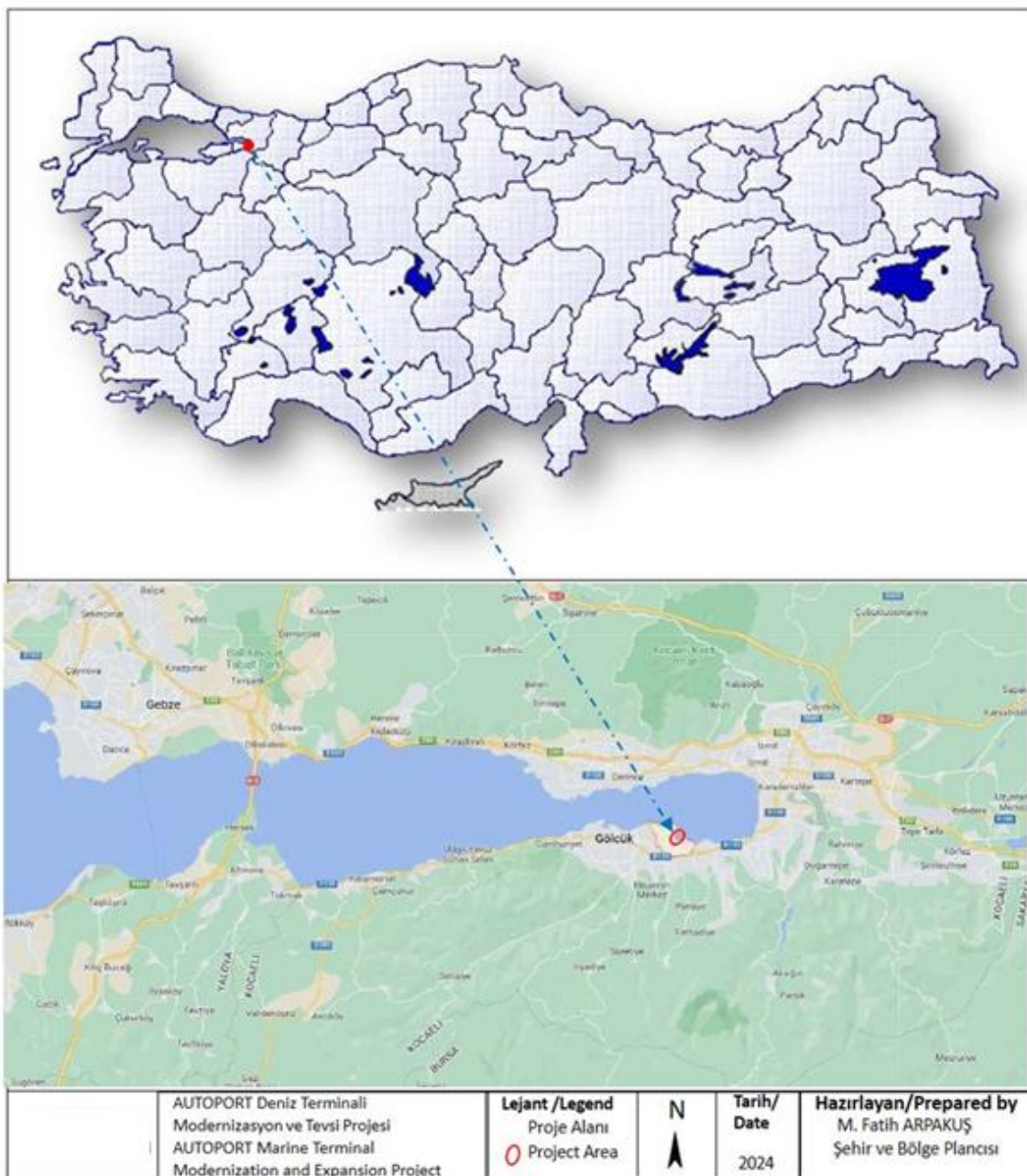


Figure 1-1 Location of the Project Area within the Country and Region

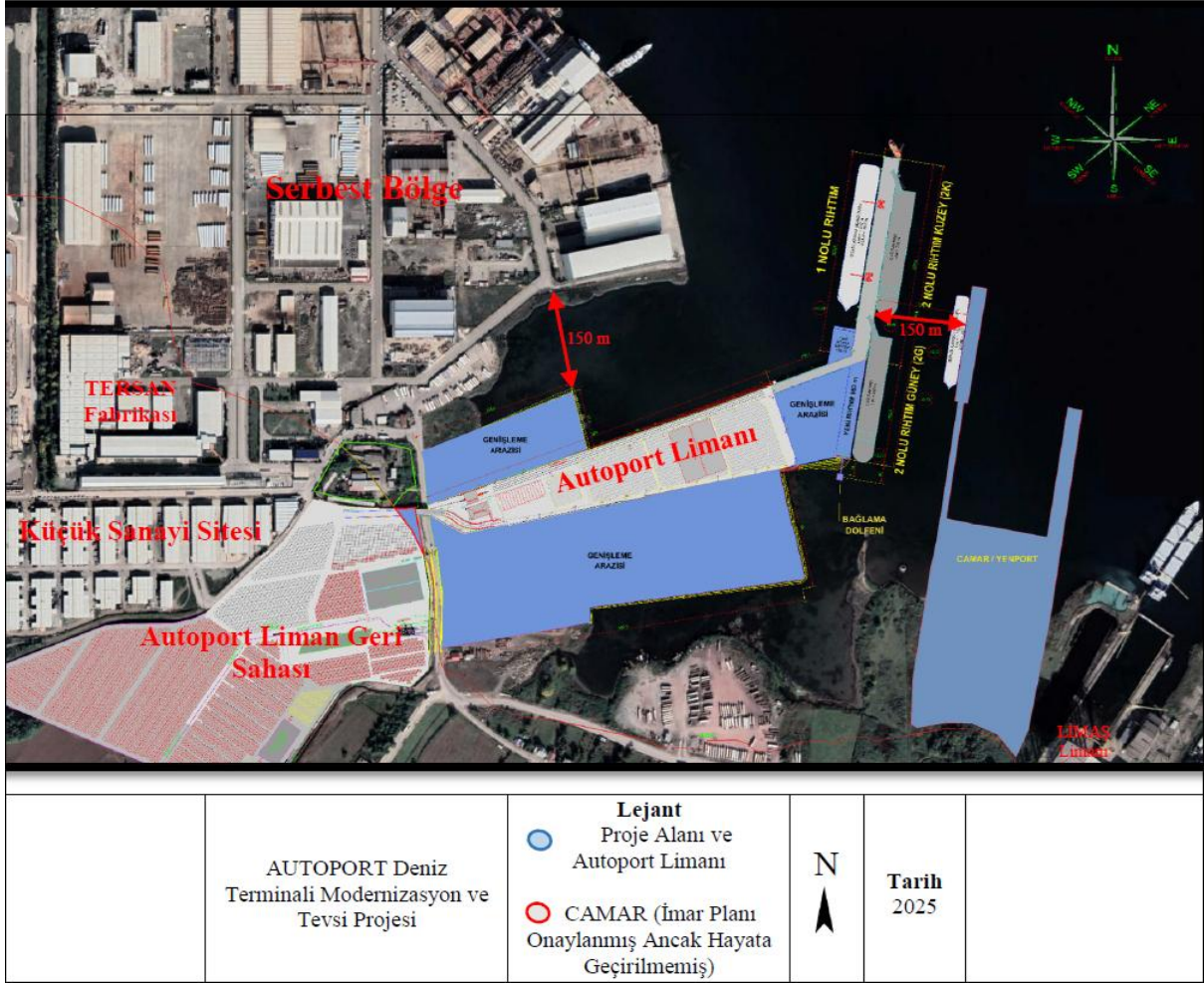


Figure 1-2 Satellite Image showing Autoport Port, Project Area and its Near Environment

The Autoport operates on a 243,351 m² area consisting of a backfill area (4,197 m²) a pier area (10,348 m²), and a land area (218,806 m²). The services offered and management services implemented at the facility are as follows (Figure 1-3 and Figure 1-4):

Table 1-1 Autoport Services

Service Information	Amount
Existing Port and Backfield	243,351 m ²
Vehicle Parking Capacity	10,000 CEU*
Forecourt	1,265 CEUS
Back field	6,235 CEUS
PDI	2,500 CEUS
Annual Handling Capacity	650,000 CEU/year
Pier Length	328.5 m x 25 m
Number of Doors	2
Pilotage	7 / 24
Terminal Automation	7/24 Online



Currently, the port's annual handling capacity 650,000 vehicles and 2,000,000 tons of general cargo. Approximately 230 Ro-Ro (roll-on roll-off) vessels and around 200 general cargo vessels are served annually. With the completion of the project, it aims to reach a handling capacity of 1,150,000 vehicles and 2,500,000 tons of general cargo. At the same time, it is envisaged that the ship acceptance capacity will be around 250 on the Ro-Ro ship side and around 300 on the general cargo ship side annually.

The maximum vessel capacity planned for the berth will be 80.000 DWT, which aligns with market demands. In this context, the planned coastal structures will have a maximum berthing capacity of 80,000 DWT.

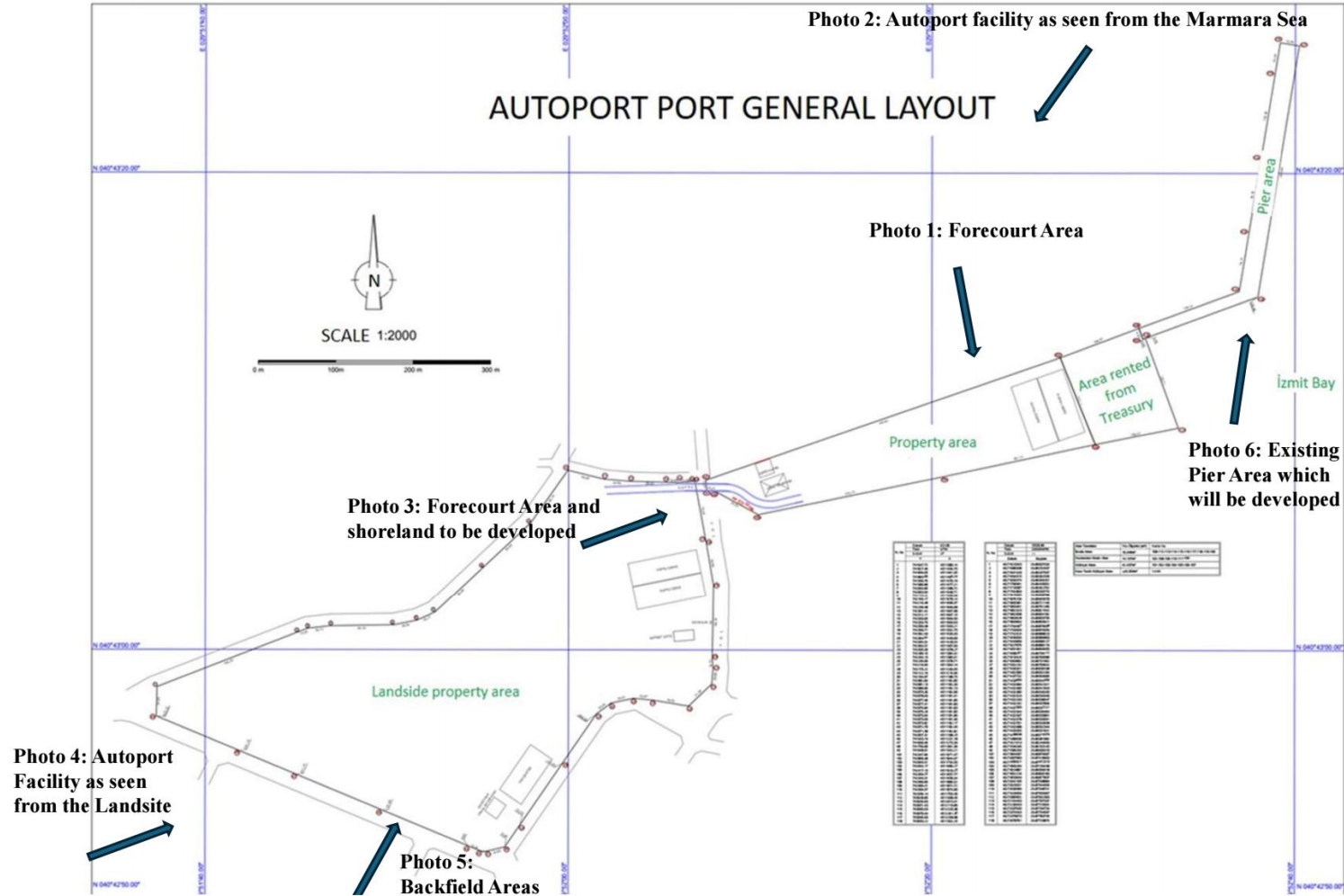


Figure 1-3 Autoport General Layout



Photo 1: Forecourt Area



Photo 2: Autoport facility as seen from the Marmara Sea



Photo 3: Forecourt Area and shoreland to be developed



Photo 4: Autoport Facility as seen from the Landside



Photo 5: Backfield Areas



Photo 6: Existing Pier Area which will be developed

Figure 1-4 Photographs of Autoport Port Components.

The Project expansion will consist of 150,707 m² area and will increase the existing Autoport total area to 394,058 m². The Project expansion will consist of:

- (1) 4,075m² (163 m x 25 m) quay,
- (2) 50 m² (25 m x 2 m) catwalk connection,
- (3) 100 m² (10 m x 10 m) dolphin,
- (4) 1,859 m² (35 m - 63 m) Ro-Ro (roll on roll off) ramp,
- (5) 64 m² fire pump station
- (6) 144,559 m² storage area, where 12,118 m² platforms on piles and a total of 455,000 m³ of filling on the 132,441 m² area are planned to be used for platform/loading/unloading/storage port facility expansion and modernization and
- (7) 487,000 m³ dredging operations will be carried out on a 110,000 m² area including slope areas

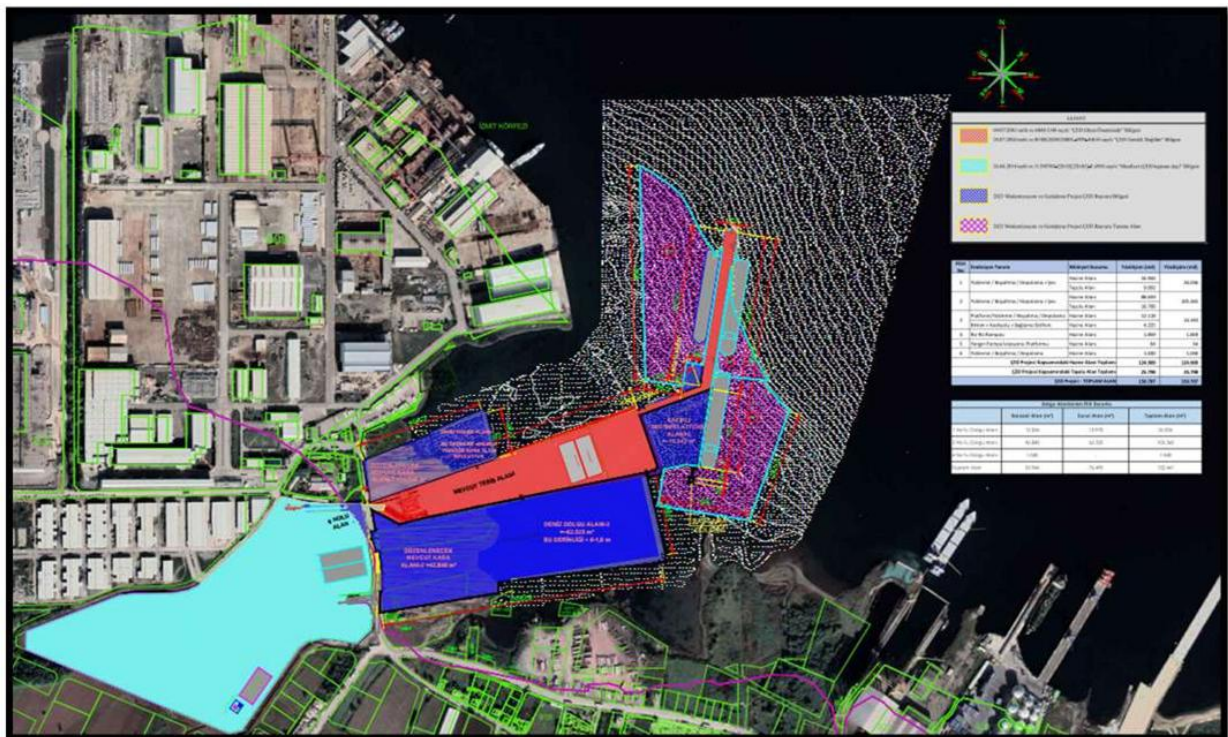


Figure 1-5 Actual Status of Project Areas and Embankment Area

The investment's construction period, excluding all kinds of permits, project design, and planning period, is foreseen as 26 months. Construction will start in 2026, and operation will start 2028 x. The workflow steps for the project to be realized within the project scope is given below

- Obtaining AYGM Approvals, Obtaining Dredging Permit, Obtaining Construction License
- Preparation of the Site (Establishment of the Construction Site, Taking Environmental Measures (warning signs, entrance-exit measures), Land
- Ready-Mixed Concrete and Backfill Material Supply, At Sea; Port Construction (Excavation, Platform, Ramp, Dock, Dolphen)
- Dredging and disposal
- Driving of Steel Pipe Piles for Platform, Ramp, Quay and Dolphin and Pouring of Stage 1 Head Beam Concrete
- Installation of Precast Beams and Pouring of Quay Concrete Stages
- Pouring of Reinforced Concrete Top Slab Concrete and Protection Concrete.
- Installation of Quay Accessories and Machinery-
- Obtaining Operating Permits and Occupancy Permits
- Commissioning

2. Background

The Project entails expanding and modernizing the Port's Ro-Ro facilities, berthing, and storage areas. The expansion area is approximately 151,000 m² (and will complement the 243,000 m² of yard, filling, and berth space belonging to Autoport in the coastal part of the Gulf of Izmit. Adding to the current berth structure, a 163m long berth will be constructed, including a 25m extension catwalk structure for the mooring dolphin. A Ro-Ro ramp will be constructed to allow Ro-Ro ships to dock by stern and use stern ramps for operations. The remaining 145,000 m² area will be expanded and modernized to support platform, loading, unloading, and storage. Approximately 487,000 m³ of dredging will be carried out. Upon the successful implementation of the Project, Autoport's annual automobile handling capacity will increase to 1,150k Car Equivalent Unit (CEU); parking capacity will increase to 17.5k CEU, and general cargo handling capacity will increase to 2.5m tons. Implementation is expected to start in Q1-2026 and be completed in 264 months.

The reclamation area construction activities will include:

- Dredging/Excavation – Remove unsuitable seabed soils (soft clays, silts) to reach competent strata or the required design depth.
- Ground Improvement (if required) – Apply stone columns, sand compaction piles, vibroflotation, or geotextiles to stabilize weak seabed soils.
- Containment Structures – Construct bunds, rock revetments, sheet piles, or caissons to hold the reclamation fill and define the reclamation footprint.
- Placement of Fill Material which will be Initial Rock Filling (Core Layer), followed by sand/Soil Backfilling and a layer by layer compaction.
- Structural Works which will include Pile/Caisson Installation and backfilling Behind Quay Structures – Place and compact fill between the quay wall and land side.

- Concrete Works – Cast platforms, quay aprons, ramps, and protective concrete layers.

The facilities classified in Annex I and Annex II of the Environmental Permit and License Regulation (Regulation on Environmental Permits and Licenses (OG Date/Number: 10.09.2014/29115)) should obtain an ‘Environmental Permit’ that covers at least one of the four subjects: air emissions, wastewater discharge (to receiving bodies), environmental noise, and deep-sea discharge. Autoport does not fall within these categories and does not require an environmental permit.

Wastes that are generated by ship activities need to be managed according to Regulation On The Collection And Control Of Waste From Ships (OG Date/Number: 12.26.2004/25682. This Regulation is based on the International MARPOL 73/78 Convention for the Prevention of Pollution from Ships. The wastes generated from the ships as based from MARPOL 73/78 Annex-1 (Bilge, Sludge, Waste Oil), Annex-IV (Sewage) and Annex-V (Garbage) originating from the ships docking at the port are received by İZAYDAŞ by the protocol signed with İZAYDAŞ. The facility is exempted from the Waste Acceptance Facility License within the scope of Article 7 of the Regulation on Waste Collection from Ships and Waste Control with the letter dated 14.02.2011 and numbered 1274 received from the Abrogated Kocaeli Provincial Directorate of Environment and Forestry.

İZAYDAS collects the following ship wastes within the maritime borders of Kocaeli Metropolitan Municipality by the provision of “Collecting, collecting, treating and making necessary arrangements for the collection, collection, treatment, and treatment of wastes of marine vessels” stated in the “i” clause of the seventh article of the Metropolitan Municipality Law No. 5216. From 2012 to 2023, İZAYDAŞ’s marine waste acceptance system has handled roughly 1.2 million m³ of oily ship waste in total. Annual treatment capacity has steadily risen from ~55,000 m³ (2012) to ~135,000 m³ (2023). Wastewater from ships (slop, bilge, sludge, waste oil) is transferred to the İZAYDAŞ reception facility. Water is separated and treated in the chemical treatment plant. Residual oil/fuel fractions are sent to the İZAYDAŞ incineration facility as supplementary fuel. The yearly was collected and treated: 2019 ~120,000 m³, 2020 ~115,000 m³, 2021 ~125,000 m³, 2022 ~130,000 m³ and 2023~135,000 m³. The facility will be able to collect and treat the waste ships from the Autoport activities

Provisions of the “Waste Management Regulation” published in the Official Gazette dated 02.04.2015 and numbered 29314 (Amended Official Gazette dated 23.03.2017 and numbered 30016) are complied with for Autoport wastes which includes temporary storage at the site, use of licensed operators and disposal of waste at licensed facilities.

No industrial wastewater is generated at the existing port facility. All domestic wastewater and washing water generated at the facility are connected to the ISU sewerage line. A discharge Quality Control License is dated 23.05.2022. The facility is exempt from environmental permits.

Autoport has the following permits:

- Coastal Facility Operating Permit: Autosport has a coastal facility operating permit that is until 27.03.2026 for the following activities: general cargo ship, Ro-Ro, and container ship loading and unloading.

- Hazardous Material Operation Permit: The certificate granted to Autoport dated 11.12.2024 and valid until 13.12.2029 is based on the Directive Regarding the Issuance of Hazardous Substance Activity Certificate (OG Date/Number: 03.08.2017/63089).
- Temporary Storage Permission: This is based on Customs Law No. 4458 (OG Date/Number: 04.11.1999/23866), Implementing Regulation of the Customs Law (OG Date/Number: 07.10.2009/27369), and Circular No. 2014-1 on Temporary Storage Locations. The permission allows areas within the port to temporarily store goods handled at the port.
- Construction and usage permit of new areas: Port expansion for facilities requires an approved EIA prior to obtaining construction and usage permit of new areas. The EIA has been approved on 04.07.2025. The project area of influence includes the following components:
 - Autoport present area
 - Autoport expansion area
 - Dredging area and its impact from noise, dredge plume and settled area
 - Disposal area for the dredged material
 - Roads being used for transport of material and impact area from noise and vibration
 - Any associated facility like quarries to be used
 - Licensed waste recovery/disposal companies
 - Sea routes used by transport ships to dispose of excavated sediments

3. Process

A number of baseline studies have been conducted to assess the environmental and social baseline. These included:

Environmental Baseline & Monitoring

- Air Quality Monitoring
- Atmospheric and Climatic Conditions
- Seawater Quality Sampling
- Sediment Quality & Marine Ecology
- Oceanographic Current
- Wave & Wind Climate Modeling
- Geotechnical Investigations
- Noise & Vibration Monitoring

Biodiversity & Habitat

- Terrestrial Flora & Fauna Surveys
- Marine Habitat Classification
- Critical Habitat Assessment

Risk & Safety Studies

- Ship Maneuvering Risk Study (berthing/unberthing under wind, current, tug conditions).
- Occupational Health & Safety Risk Assessment
- Traffic & Vehicle Maneuvering Risk Review
- Earthquake/Liquefaction Risk Analysis

Social & Institutional Studies

- Socio-Economic Baseline
- Stakeholder Engagement & Grievance Mechanism
- Security Assessment

Environmental Impact Assessment (EIA), prepared in 2024 and submitted to the Ministry of Environment, Urbanization and Climate Change (MoEUCC); the document assessed the Project's environmental impacts. The EIA was prepared to satisfy the requirements of the Environmental Impact Assessment Regulation, as published in the Official Gazette on 29 July 2022, No. 31907. The EIA was approved on 04.07.2025.

The ESA identified the potentially significant existing and future adverse environmental and social impacts associated with the Client's current operations and the expansion project of the port, confirm project categorization in line with the ESP 2019, and IFC Sustainability Framework (2012); assess compliance with applicable laws and the EBRD ESP and PRs, IFC Performance Standards (PS) (2012) and adoption of Good International Industry Practice (GIIP) as reflected in WBG Environmental, Health, and Safety Guidelines (EHSGs); determine the measures needed to prevent or minimize and mitigate the adverse impacts, and identify potential environmental and social opportunities, including those that would improve the environmental and social sustainability of the Project and/or the associated current operations and/or those that could qualify for EBRD Green Economy Transition (GET).

The assessment covered, in an integrated way, all relevant direct and indirect environmental and social impacts, issues, and opportunities related to the Port facilities and its operations, the Project, and the relevant stages of the project cycle (e.g., pre-construction, construction, operation, and decommissioning or closure and reinstatement). The assessment identified the project area of influence, including any associated facilities, potential cumulative impacts, and contextual risks of the project. The ESA results, as discussed in this document, indicated that the expected ES risks are limited and generally site-specific and can be avoided or mitigated by adhering to relevant performance requirements, procedures, guidelines, or design criteria. The ESA identified some data gaps that must be addressed to meet IFC Performance Standards and EBRD Performance Requirements. These gaps include:

- Lack of an environmental and social assessment of the quarry supplying fill material which will be finished,
- Absence of gender-based violence and harassment (GBVH) risk assessment,
- Insufficient coverage of labor rights issues,
- Incomplete baseline and impact studies for noise (traffic, piling, underwater),
- No comprehensive traffic risk assessment for construction truck movements,
- Gaps in occupational health and safety (OHS) and process safety evaluation,

The ESA was prepared to assess project's compliance with applicable requirements. The applicable requirements are given in Section 4.0

4. Project Applicable requirements:

The project must comply with a suite of local, national, and regional environmental and social requirements, in addition to international standards. The key national framework is Turkey's Environmental Impact Assessment (EIA) Regulation (Official Gazette Date/Number: 29.07.2022/31907) which governs how project impacts must be assessed, reported, and approved by the Ministry of Environment, Urbanization and Climate Change (MoEUCC). The past EIA permits obtained for the Project are given in Annex 1.

Other key national laws and regulations include:

- Environmental Law No. 2872 – overarching law on environmental protection.
- Occupational Health and Safety Law No. 6331 – defines OHS obligations for employers and contractors.
- Labour Law No. 4857 – regulates employment conditions, contracts, and worker rights.
- Social Security and General Health Insurance Law No. 5510 – governs worker insurance and benefits.

The project is required to comply with a comprehensive framework of international financial institution standards, EU directives, international conventions, and good practice guidance on environmental and social issues. This includes the EBRD's Environmental and Social Policy (2019) and IFC Performance Standards (2012), alongside the World Bank Group's EHS Guidelines (general and sector-specific for ports and terminals). In addition, it must observe relevant EU directives such as the EIA and IE Directives, as well as international conventions covering maritime safety, security, and pollution control, including MARPOL, the Ballast Water Convention, the ISPS Code, and the OPRC Convention, among others. Labour rights and occupational health are addressed through compliance with ILO core conventions and sector-specific standards (e.g., dock work safety, security in ports). Complementing these are a series of good practice notes and handbooks issued by IFC, EBRD, and other bodies, which provide practical guidance on topics such as cumulative impact assessment, stakeholder engagement, managing contractors, worker accommodation, security and human rights, modern slavery, and gender-based violence and harassment. Together, this framework ensures that the project aligns with international best practice on environmental protection, social performance, labour conditions, and human rights. A full list is given in Annex 1.

5. Stakeholder consultation, engagement and disclosure

Autoport have prepared a Stakeholder Engagement Plan (SEP), identifying stakeholders interested in the project and interaction type and frequency. The methodology, including frequency of engagement, and type of engagement, has been identified. The following activities for Meaningful Consultation and Engagement for the Port development will be undertaken.

- Prepare leaflets/brochures. a non-technical summary of the project (including information on grievance management and especially on impact management on fishing activities, noise, and traffic management) in a user-friendly language and make it available in the neighborhoods and public places like the municipality.

- Plan project-specific stakeholder engagement activities yearly on important issues for stakeholders, including local employment, livelihood restoration, noise management, access to information, and GBVH and identify specific targets rather than acting on an Ad hoc basis.
- Prioritize the affected communities for the stakeholder engagement activities,. Record feedback and content of meetings with stakeholders and an update on what was done in response correctly.

Stakeholder engagement covered public disclosure meetings, neighborhood leadership, fishermen and associations, transport cooperatives, and institutional actors. The main concerns raised were traffic impacts, fishing, lack of maps/clarity on prohibited zones, and insufficient direct communication. Autoport responded with a Traffic Impact Assessment, meetings with the Mukhtar, and coordination with local authorities.

The stakeholder engagement activities undertaken to date include

Public Participation in the EIA Process

- A public participation meeting was held in line with Article 9 of the EIA Regulation.
- Announcement: Published in local newspaper *Bizim Yaka Kocaeli* and national newspaper *Birgün* on 05.04.2023.
- Meeting: Took place on 18.04.2023 at Karşıyaka Cultural Center Nikah Hall, Başiskele, Kocaeli.
- Participants: Officials from Kocaeli Provincial Directorate of Environment, Urbanization and Climate Change, Autoport, and PRD.
- Discussion topics: Traffic density from port operations and boat launching from the filling area.

Stakeholder Engagement During ESA

- Local Community (Sepetlipınar Neighborhood). Meeting with the newly elected Mukhtar (March 2024).
- Key issues:
 - Heavy vehicle traffic using inner settlement roads; municipality requested to address via a dedicated Traffic Impact Assessment Report prepared by Autoport.
 - Requests for more information about emergency planning and updates on expansion.
 - Community profile: 300–400 households, mostly retired and elderly, with local schools and a health unit.

Fishermen

- Interviews with two informal fishers (approx. 16 in total); unlicensed, small-scale, not directly affected by expansion. Boats could be stored east of the port without issue.
- Engagements with fishermen's and angling associations:
 - Kocaeli Sportive Angling Sports Club Association (founded 2017)
 - Basiskele Fishermen Association (2005):
 - Saraybahce Sandalcılar Association (1990):

- 60 Evler Fishermen’s Association (1994)
- Kamader (2005):

Transport Organizations

- Engagement with Yeniköy Transportation Cooperative and Müha Nakliyat.
- Both confirmed awareness of the project and reported no complaints.

Port Authority and Institutional Engagement

- Port Authority interviewed:
- Ongoing coordination with IMEAK Chamber of Shipping (Kocaeli Branch), which plays an active role in informing stakeholders.

Other Stakeholders Identified

- Neighboring facilities/industrial operators: Ford Otosan Yeniköy, Yeniköy Small Industrial Site, Kosbas Free Zone, Icdas, Limaş, Ceva Logistics Ford Truck Park, and the nearest household.
- Local authorities: Basiskele Municipality, Sepetlipınar Mukhtar.
- NGOs/associations: TÜRKLİM, Union of Chambers of Turkish Engineers and Architects (Chamber of Environmental Engineers, Kocaeli branch), Chamber of Shipping (Kocaeli Branch).

A summary of the stakeholder groups that will be contacted include

External Stakeholders

- National Institutions: Ministries (Environment, Labor, Transport, Family and Social Services), General Directorates (Coastal Safety, Hydrography, Infrastructure, Dangerous Goods, Customs, Agriculture, Health), and Port Authorities.
 - *Main focus:* Policy, permitting, and compliance oversight.
- Local Institutions: Provincial and district directorates, municipalities, governorates, police/gendarmerie.
 - *Main focus:* Local development, permitting, socio-economic and environmental management.
- Lenders: EBRD, IFC.
 - *Main focus:* Finance, ensuring compliance with E&S safeguards.
- NGOs & Associations (international, national, local):
 - Sectoral: TÜRKLİM, UTIKAD, UND, TUSIAD, PERYÖN, KALDER.
 - Chambers: Chamber of Commerce, Chamber of Shipping (Kocaeli), Chamber of Industries.
 - Biodiversity-relevant: Kocaeli Fisheries Cooperatives Union, Kocaeli Sportive Amateur Anglers and Wildlife Protection Association (KAMADER), Yarımca Amateur Anglers’ Association, Turkish Marine Research Foundation (TUDAV), WWF Türkiye.

- *Main focus*: Environmental and social impacts, CSR, inclusivity, marine ecology, and fisheries protection.
- Education Institutions: Kocaeli University, local schools.
 - *Main focus*: Technical consultancy, capacity building, CSR.
- Business Environment: Local service providers, contractors, security, catering, facility management companies.
 - *Main focus*: Economic participation, service provision.
- Media: Local and national outlets, TV, online platforms.
 - *Main focus*: Information dissemination, community awareness.
- Project Affected Persons (PAPs): Local residents (Sepetlipınar), fishermen, municipal representatives.
 - *Main focus*: Community health and safety, traffic, access to livelihoods (notably fishing).

The contact details for submitting grievances to Autoport and contacting its units are provided below:

Autoport Liman İşletmeleri A.Ş

- Address: Sepetlipınar Mahallesi Arpalık Caddesi No:100 Başiskele – KOCAELİ
- Telephone: (0262) 315 38 00
- Fax : (0262) 315 38 70
- e-mail:autoport@autoport.com.tr

6.0. Environmental and Social Benefits, Adverse Impacts and Mitigation Measures

The key E&S topics, the associated risks, the potential impacts and significances as well as the proposed mitigation measures are presented in Table 5-1

Table 5-1 Potential E&S of The Project During the Construction and Proposed Mitigation Measures

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
Management Systems	Construction phase risks: Current Autoport ESMS (ISO 14001, ISO 45001, ISO 9001) focuses only on operations. Construction activities — dredging, reclamation filling, piling, excavation, concrete works, heavy truck movements, and material storage — create risks of dust, noise, vibration, marine water quality deterioration, waste generation, traffic accidents, and OHS incidents. Without a construction-phase ESMS, these risks may go unmanaged.	High The risk is high because: • construction has complex activities with significant potential to affect sensitive receptors (settlements, fisherfolk, schools, marine ecosystems). • Without integration of construction-phase into ESMS, compliance with EBRD/IFC standards may fail. • Unmanaged contractor performance could lead to accidents, regulatory violations, reputational harm, and project delays.	Update Autoport ESMS to manage existing and potential environmental and social risks and impacts. <ul style="list-style-type: none"> • Integrate construction to be aligned with ISO 14001/45001 • Autoport E&S Dept. to revise ESMS before mobilization while adding construction oversight roles, staff training. Conduct annual independent audits. Prepare/update policies and ESMPs for project. <ul style="list-style-type: none"> • Prepare CESMP and update ESMP covering E&S issues (air, noise, waste, OHS, GBVH, stakeholder engagement, climate). Contractor to draft CESMP within 30 days of award; • Autoport to approve integrated sub-plans; Develop Supply Chain Management Systems <ul style="list-style-type: none"> • Supply chain policy for quarry fill, transport, waste handlers; ensure compliance with Turkish law and IFC/EBRD. • Procurement needs included E&S clauses in contracts (already conducted) Prepare and implement CESMP and ESMP with monitoring plan in line with EIA and IFC/EBRD. <ul style="list-style-type: none"> • Include measurable targets (e.g., zero lost-time injuries, noise <55 dB(A), dust <50 µg/m³ PM • Contractor E&S Manager to prepare CESMP pre-mobilization; Port and Terminals Operations Group HSE Manager and Autoport HSE Manager to approve monitoring reports submitted quarterly 	Low
Additional E&S Assessments	Construction phase risks: The current EIA does not	High The risk is high	Prepare supplementary studies for the local EIA for the project assessment to meet IFC PS and EBRD PR	Low

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
	<p>include adequate baseline data or assessments. Missing studies include: noise baselines at sensitive receptors, underwater noise and vibration from piling/dredging, and quarry E&S impacts for fill material sourcing. Without these, impacts on households, schools, and marine biodiversity may be underestimated.</p>	<p>because:</p> <ul style="list-style-type: none"> • Missing baselines make prediction unreliable. • Without studies, mitigation may be ineffective, leaving sensitive receptors (residents, fisherfolk, ecosystems) exposed. • Non-compliance with IFC/EBRD could result in financing delays, regulatory rejection, or stakeholder opposition. 	<p>requirements. Additional studies must address quarry impacts, social impacts, GBVH, labour, noise, underwater noise, traffic, OHS, soil/groundwater, and process safety. The results should be integrated into CESMP/ESMP; and findings disclosed to regulators and stakeholders.</p> <p>Quarry E&S Assessment. Assess impacts of quarrying on dust, noise, traffic, OHS, and biodiversity. Quarry operator needs to submit valid permits and monitoring data and Autoport needs audit annually.</p> <p>GBVH Risk Assessment: Identify risks of worker-community interactions and design Code of Conduct and training. Autoport HR and E&S teams need to develop GBVH protocol pre-construction; contractors to train all staff.</p> <p>Labour Rights Assessment. Review compliance with Turkish Labour Law, ILO conventions, and IFC PS2. Contractor HR should monitor hours, overtime, wages while Autoport needs to audit contractors quarterly.</p> <p>Noise Baseline and Modelling. Baseline noise measurements at receptors; model construction/noise.</p> <p>Underwater Noise/Vibration Assessment. Hydroacoustic modelling for piling/dredging. Monitoring should be conducted during works. The methods should be modified (e.g., bubble curtains) if thresholds exceeded.</p> <p>Traffic Risk Assessment. Assess heavy truck impacts on municipal roads, accident risk. This should include quarry-to-port routes and contractor need to provide defensive driving training;</p> <p>Soil and Groundwater Baseline. Establish pre-construction contamination levels for future comparison.</p>	

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
			<p>OHS and Process Safety Assessment. Assess construction safety hazards. Contractor needs to integrate into CESMP and Autoport to update ERP.</p>	
<p>Contractor E&S Management</p>	<p>Construction phase risks: Contractors and subcontractors will perform dredging, reclamation filling, piling, concrete works, and transport. If they lack adequate E&S systems, risks include: uncontrolled dust/noise emissions, improper waste/hazardous material handling, unsafe traffic operations, weak PPE use, OHS failures, and labour rights violations (hours, wages, worker accommodation). Weak oversight can lead to major accidents, pollution incidents, or social conflict.</p>	<p>High The risk is high because:</p> <ul style="list-style-type: none"> • Contractors carry out the highest-risk activities, both during construction • Without strict management, there is a high likelihood of serious incidents (injuries, fatalities, spills, accidents). • Poor contractor performance exposes Autoport to non-compliance, reputational damage, financial penalties, and possible work stoppages. 	<p>The Contractor should comply with project ESMS developed for the project or develop and implement an Environmental and Social Management system following the requirements of ISO 14001 and ISO 45001, including a detailed organizational structure specific to the expansion project. Contractors must establish ESMS aligned with Autoport’s system, covering all CESMP sub-plans. Contractor to submit ESMS framework pre-mobilization; Autoport to review/approve; independent audits bi-annually.</p> <p>The Construction Contractor to establish a strong HSE team within the primary construction team and subcontractor, including an experienced Environmental Expert and a Health and Safety Expert with clearly defined roles and responsibilities, and authority. HSE team to oversee compliance, reporting, training, and emergency response. Contractor to appoint named HSE professionals; Autoport to verify CVs/experience; weekly coordination meetings with Autoport ESMS Manager.</p> <p>Integrate E&S obligations into contracts and tenders. All contractor agreements must include compliance with Turkish Labour Law, IFC PS2, EBRD PR2, and Autoport ESMS. Procurement team to insert E&S clauses into contracts; contracts voidable for repeated breaches.</p> <p>Require Construction HSE Plans (CESMPs). Plans must cover site-specific hazards, safe work procedures, PPE, emergency response, and permit-to-work system. Contractor will prepare CESMP before mobilization</p> <p>Pre-mobilization audits and induction training. Assess contractor readiness; provide training on ESMS, OHS, GBVH, and community relations. Autoport will audit contractor facilities</p>	<p>Low</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
			<p>pre-mobilization; induction training mandatory for all staff/subcontractors.</p> <p>Regular inspections and monitoring. Weekly site inspections; monthly compliance audits; corrective actions tracked</p> <p>Worker grievance mechanism. Accessible and anonymous channels for contractor/subcontractor workers to raise complaints. Autoport HR will set up hotline/email/boxes; grievance logs reviewed monthly.</p>	
<p>Permit Requirements</p>	<p>If construction permits, licenses, and approvals are not obtained or not updated (e.g., for dredging, filling, reclamation, quarry material sourcing), construction activities could be delayed, halted, or found non-compliant with Turkish regulations.</p>	<p>High The risk is high because:</p> <ul style="list-style-type: none"> • Permits are legally binding and essential for construction • Non-compliance leads directly to work stoppages, legal sanctions, or denial of operation. • Permit-related delays can jeopardize financing agreements with EBRD/IFC and damage reputation with authorities. 	<p>Develop and maintain an E&S compliance register to document all applicable legal requirements, including relevant permits, licenses, registrations, and approvals. The register should be digital, updated quarterly, and include deadlines for renewals. Autoport Legal/Compliance will maintain register; internal compliance checks will be conducted every quarter; summary report to management board.</p> <p>Construction and usage permits are to be obtained before the start of the port construction. Permits include construction license, dredging/filling approvals, quarry supply permits, stormwater discharge permits. Autoport Project Team will submit applications 6 months before mobilization; MoEUCC approvals required before site handover; no works will commence until permits secured.</p> <p>All operating permit registrations will need to be revised to accommodate the expansion of the port. Updates include air emission permits, wastewater discharge limits, waste handling permits, oil storage approvals, port operating license. Autoport O&M Department will initiate revisions 12 months before commissioning</p> <p>Assign dedicated compliance officer. A compliance officer</p>	<p>Negligible</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
			<p>ensures timely submission and renewal of permits. Compliance officer will be appointed by Autoport Management; monthly dashboard tracking permit status will be shared with E&S Steering Committee.</p> <p>Conduct annual legal compliance audits. Independent auditors review compliance against Turkish law and IFC/EBRD standards. Autoport will commission annual legal audit; findings will be integrated into ESMS improvement plan.</p>	
Air Quality	<p>Site preparation, dredging, filling, excavation, truck movements, and unpaved haul roads generate dust (PM₁₀/PM_{2.5}). Heavy machinery and trucks emit diesel exhaust (NO_x, SO₂, CO, PM). If uncontrolled, nearby households, schools, and workers are exposed to harmful pollutants.</p>	<p>Medium The risk is medium because:</p> <ul style="list-style-type: none"> • Dust and emissions during construction are temporary but can significantly affect community health. • Exceedances of IFC EHS guideline values (PM₁₀: 50 µg/m³ daily; PM_{2.5}: 25 µg/m³ daily) could result in community complaints and regulatory penalties. 	<p>Develop and implement an Air Quality Management Plan for the construction phase as per the CESMP. Plan should cover dust suppression, machinery emissions, and monitoring strategy. Contractor will prepare plan pre-mobilization</p> <p>Conduct air quality measurements for the CESMP. Baseline measurements of PM₁₀, PM_{2.5}, SO₂, NO_x at nearest sensitive receptors and truck routes for preconstruction and then once every six months. Dust monitors will be installed at site boundary as needed.</p> <p>Dust suppression. Daily water spraying on haul roads, excavation zones, and stockpiles; covering trucks; limiting speed on unpaved roads.</p> <p>Low-emission equipment. Require Tier III/IV compliant engines or equivalent; mandate low-sulfur diesel fuel. Contractor fleet will be inspected pre-mobilization; maintenance logs submitted monthly.</p> <p>Community protection. Inform local community in advance of high-dust activities; establish grievance hotline for air complaints. Autoport Community Liaison Officer (CLO) will manage notifications and grievance log.</p>	Negligible
Noise and Vibration	<p>Piling, dredging, excavation, concrete works, truck movements, and heavy</p>	<p>Medium The risk is medium because:</p>	<p>Develop and implement a Noise and Vibration Management Plan for construction phases as per the CESMP. Plan must include baseline measurements, noise modeling, permissible</p>	Low

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
	<p>machinery generate high levels of noise and ground vibration. These can cause nuisance and health risks to nearby residents, schools, and workers, and can also disturb marine fauna (e.g., fish, mammals) through underwater vibration and acoustic pressure.</p>	<ul style="list-style-type: none"> • Construction noise and vibration are temporary but intense, requiring careful control. • Exceedance of IFC EHS thresholds could damage Autoport’s relationship with local communities and fisheries. 	<p>limits, and specific measures for marine and terrestrial receptors. Contractor will prepare plan pre-mobilization; Conduct noise and vibration measurements during the construction phase. Baseline noise measurements at nearest households, schools, and sensitive habitats; continuous noise monitoring during piling and heavy construction. Accredited lab will carry out baseline and monitoring during peak activities; results will be submitted to Autoport ESMS Manager and corrective measures will be triggered if thresholds exceeded. Limit high-noise activities. Restrict piling, hammering (08:00–19:00). Contractor will schedule works accordingly; Use noise and vibration reduction measures. Use mufflers/silencers on machinery, install temporary noise barriers or enclosures, and apply low-noise piling methods (e.g., vibro-piling, press-in). Marine biodiversity protection. Implement available low-noise construction technologies and relevant procedures to reduce noise at the source and throughout construction activities; and Use of passive acoustic monitoring (PAM) during construction, and ceasing pile driving or other activities that generate percussive marine noise when mammals are present within 1,000 meters of the project and any other underwater construction when mammals are present within 500 meters; Autoport will contract biodiversity expert to monitor during activities. Community protection. Inform residents and stakeholders before noisy activities; provide hotline for complaints. Autoport Community Liaison Officer will coordinate notifications and track grievances.</p>	
<p>Geology, Soils, and Groundwater</p>	<p>: Excavation, filling, and dredging activities risk spills and leaks from fuels, lubricants, and chemicals stored on-site. Poor management of solvents, paint, or concrete admixtures</p>	<p>Medium The risk is medium because: <ul style="list-style-type: none"> • Soil and groundwater contamination tends to be localized, but </p>	<p>Develop and implement a hazardous material management plan for the construction phase as per the CESMP . Plan must specify safe storage, handling, labeling, transport, and disposal of hazardous substances. Secondary containment.All fuel and chemical tanks must be banded to 110% of tank capacity. Contractor will install bunds</p>	<p>Negligible</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
	<p>could cause localized soil and groundwater contamination. Earthworks may also destabilize soils if not controlled, leading to erosion and sediment transport.</p>	<p>impacts can be long-term and costly to remediate.</p> <ul style="list-style-type: none"> Contamination could also affect surface waters through runoff, impacting marine biodiversity and fisheries. Poor controls increase liability for clean-up under Turkish law and IFC EHS standards. 	<p>before commissioning storage areas; Autoport ESMS team will verify compliance.</p> <p>Spill prevention and response. Spill kits and emergency procedures must be available at all hazardous storage and handling points. Contractor will provide spill kits; train workers in spill response;</p> <p>Erosion and sediment control. Install silt fences, sediment traps, and stabilize exposed soils. Contractor will include erosion controls in CESMP</p>	
<p>Surface Water</p>	<p>Runoff from dredging, filling, and excavation areas may carry suspended solids, oils, and chemicals into the marine environment. Accidental spills (fuels, lubricants, concrete wash water) can pollute nearby coastal waters. Temporary works (e.g., cofferdams) may alter hydrodynamics, increasing sediment transport.</p>	<p>High</p> <p>The risk is high because:</p> <ul style="list-style-type: none"> The port is directly adjacent to sensitive marine ecosystems and fishing grounds. Pollution of surface water has immediate impacts on biodiversity, fisheries, and community livelihoods. Failure to control discharges can lead to regulatory violations, fines, and reputational harm with stakeholders 	<p>Develop and implement surface runoff (i.e. stormwater) management plan. Plan should address collection, treatment, and monitoring of stormwater, including design of drains and retention ponds. Contractor will prepare plan pre-construction;</p> <p>Build a spill containment system, including oil and water separator system at the end of the surface water drainage points that are located before discharge to the sea environment. Oil-water separators must meet Turkish standards. Contractor will install separators before operational phase; O&M team will maintain quarterly; discharge quality tested once every six months monthly.</p> <p>Periodically test the stormwater discharge to ensure that the water quality is acceptable for discharge. Parameters include COD, TSS, oil & grease, heavy metals. Accredited lab will conduct sampling monthly during construction</p> <p>Emergency spill response. All stormwater outlets must have shut-off valves in case of major spill. Contractor will install valves pre-operation; Autoport O&M to test during drills; CLO to inform</p>	<p>Negligible</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
			<p>community in case of significant incident.</p> <p>Marine water quality monitoring. Monitor turbidity, oil & grease, nutrients, and heavy metals in nearshore waters. Independent marine consultant will sample quarterly; results disclosed to stakeholders and shared with fisheries associations.</p>	
Biodiversity	<p>Dredging, reclamation filling, and piling increase turbidity and sedimentation, which can smother benthic habitats and reduce light penetration. Underwater noise and vibration from piling and dredging may disturb fish and marine mammals. Coastal reclamation leads to permanent habitat loss in intertidal and subtidal zones. Vessel traffic during construction increases collision risks for marine fauna.</p>	<p>High The risk is high because:</p> <ul style="list-style-type: none"> • Marine ecosystems near the port are ecologically sensitive and economically important for fisheries. • Biodiversity impacts may be irreversible (habitat loss) or cumulative (noise, turbidity, lighting). • Negative impacts on fish and marine mammals can create long-term community opposition and reputational risks. 	<p>Develop a biodiversity management plan. Plan should address construction and operational biodiversity risks, including habitat protection, species monitoring, and compensation for habitat loss. Biodiversity expert will prepare plan before construction;</p> <p>Minimize turbidity and sedimentation. Use silt curtains and phased dredging to reduce sediment plumes. Contractor to install silt curtains prior to dredging; monitor turbidity in real-time; stop works if thresholds exceeded.</p> <p>Control underwater noise. Implement available low-noise construction technologies and relevant procedures to reduce noise at the source and throughout construction activities; and use of passive acoustic monitoring (PAM) during construction, and ceasing pile driving or other activities that generate percussive marine noise when mammals are present within 1,000 meters of the project and any other underwater construction when mammals are present within 500 meters;</p> <p>Protect migratory species. Schedule high-noise marine works outside critical spawning and migration seasons. Autoport will coordinate with fisheries associations; adjust construction calendar accordingly. This item is related to disposal site activities</p> <p>Monitoring and disclosure. Bi yearly monitoring of marine biodiversity (fish, plankton, benthic organisms). Independent consultant will carry out surveys; results disclosed to community and regulators; corrective actions if significant declines detected.</p>	Low
Waste	Dredging and reclamation produce large volumes of	High The risk is high	Develop and implement a waste management plan for the construction phase as per the CESMP. Plan must include	Low

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
	<p>excavated sediments. Improper disposal of dredged material may pollute marine/coastal areas. Construction generates domestic waste (food, packaging), inert waste (concrete, scrap), and hazardous waste (oily rags, waste oil, chemical containers). If unmanaged, waste may contaminate soil, groundwater, and marine waters, and attract pests.</p>	<p>because:</p> <ul style="list-style-type: none"> • High volumes of waste expected during dredging/filling. • Poor waste handling can cause environmental pollution, community health hazards, and regulatory penalties. • Hazardous waste mismanagement creates long-term liabilities and reputational risks. 	<p>segregation, labeling, collection, safe storage, transportation, and disposal through licensed operators. Contractor will prepare WMP pre-mobilization;</p> <p>Dredging Management and Monitoring Plan in line with IFC/EBRD requirements and Turkish regulations. Plan should address dredging methods, disposal sites, monitoring of turbidity, sediment quality, and marine impacts. Contractor will submit plan before dredging; MoEUCC approval required; biodiversity expert to monitor during dredging.</p> <p>Licensed waste contractors. All waste, especially hazardous waste, must be transferred to İZAYDAŞ or other licensed operators. Contractor and Autoport will contract only licensed waste handlers; keep transfer manifests for auditing.</p> <p>Waste minimization and recycling. Promote reduction and recycling of packaging, scrap metals, and plastics. Contractor will establish recycling points onsite; Autoport O&M will track volumes recycled annually.</p> <p>Hazardous waste storage. Store hazardous waste in sealed, bunded areas with impermeable flooring. Contractor will designate storage zones; ESMS Officer to inspect weekly; emergency procedures posted visibly.</p> <p>Worker training. Train workers on segregation, labeling, and handling of hazardous vs. non-hazardous waste. Contractor HSE team will conduct induction training and refresher every 6 months; attendance logs kept.</p> <p>Monitoring and disclosure. Track all waste volumes by type; disclose in sustainability reports. Autoport ESMS will prepare quarterly waste statistics</p>	
Hazardous Material	Poor storage of fuels, solvents, paints, and	Medium The risk is medium	Develop and implement a hazardous material management plan for the construction phase as per the CESMP. Plan should	Negligible

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
	<p>chemicals, combined with lack of Material Safety Data Sheets (MSDS), increases the risk of leaks, fire, and worker exposure. Accidental spills can contaminate soil, groundwater, and marine waters. Improper handling can lead to worker injuries, fires, and environmental pollution.</p>	<p>because:</p> <ul style="list-style-type: none"> • Hazards are localized but can cause severe accidents or pollution events if controls fail. • Improper hazardous material handling directly violates Turkish regulations and IFC/WBG EHS Guidelines. • Effective controls (containment, MSDS, training) can significantly reduce risk. 	<p>cover hazardous material inventory, safe storage, MSDS access, spill response, and emergency procedures. Contractor will prepare plan before mobilization; Autoport ESMS Manager will approve; maintain updated chemical inventory; distribute MSDS in Turkish and English.</p> <p>Secondary containment. All tanks and drums must be placed in bunded areas with impermeable flooring to 110% capacity. Contractor will build bunds before chemical delivery; Autoport E&S will verify; quarterly inspection records.</p> <p>Spill prevention and response. Spill kits, absorbents, and emergency shut-off valves must be installed at all storage and handling points. Contractor will provide kits; workers trained in spill response during induction; Autoport will organize quarterly spill drills.</p> <p>Fire safety. Hazardous material storage must have fire detection, extinguishers, and separation of incompatible materials (e.g., fuels vs. oxidizers). Contractor will install fire systems pre-mobilization; Autoport Fire Safety Officer will inspect monthly.</p> <p>Transport and disposal. Hazardous wastes (oils, solvents, chemicals) must be transported by licensed contractors with proper manifests. Contractor and Autoport will contract only licensed handlers (e.g., İZAYDAŞ); Autoport ESMS to maintain records of transfers.</p> <p>Worker training. Train all staff in hazardous material handling, PPE, and emergency procedures. Contractor HSE will provide induction and semi-annual refresher courses;</p>	
Traffic	<p>Heavy truck movements hauling quarry fill and construction materials on municipal roads and within</p>	<p>High The risk is high because:</p> <ul style="list-style-type: none"> • Likelihood: High 	<p>Noise & Vibration Management Plan (CESMP), Community Health & Safety Plan (ESMP), and a Traffic Management Plan (TMP) including quarry–port movements. Integrate road safety engineering controls (routing, signage, speed limits), operational</p>	

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
	<p>the port create risks of road accidents (vehicle–vehicle, vehicle–pedestrian), congestion at community choke points, degraded air quality (dust/exhaust), noise/vibration along haul routes, and damage to local roads. Interface risks at site gates (queuing, reversing) elevate collision potential with residents and site workers.</p>	<p>daily truck volumes over a prolonged period (construction) on mixed-use public roads.</p> <ul style="list-style-type: none"> • Consequence: Potential for severe injury/fatality, multi-vehicle incidents, and secondary impacts (spills, community disruption). • Receptor sensitivity: Residential streets, schools, fishermen using coastal roads/launch points. • Cumulative exposure: Overlaps with air/noise impacts and existing industrial traffic in the corridor. 	<p>controls (scheduling, staging, marshaling), and behavioral controls (training, enforcement). Contractor to prepare a consolidated TMP before mobilization; Autoport ESMS Manager will approve; coordinate with Municipality and Provincial Directorate for route approvals and signage.</p> <p>Road safety policy, practices, and procedures including a defensive driving training program for own drivers, earthmoving, and concrete mixer drivers. Defensive driving, fatigue management, safe following distances, speed discipline, blind-spot awareness, reversing controls (banksmen/spotters), winter driving, and night operations. Contractor/Autoport will deliver induction plus annual refreshers; verify driver certifications; maintain training logs; conduct periodic ride-along audits.</p> <p>Assess the driving skills of heavy-vehicle drivers before hiring and the skills of existing drivers. Pre-employment road test on project-specific routes; simulator or closed-course evaluation for high-risk vehicles (articulated dumpers, mixers). Autoport/Contractor HSE & Transport Supervisors will document assessments; re-tests after incidents or long absences.</p> <p>Monitor and analyze third-party road accidents and incidents related to construction activities. Establish an incident database covering near misses, community complaints, and police reports; analyze hotspots and time-of-day patterns; implement corrective actions. CLO & HSE to compile monthly KPI dashboard (accident rates per 100k km, speeding violations, near misses); review at E&S Steering Committee; communicate trends to Municipality and community.</p> <p>Haul-route management & scheduling. Designate approved haul routes avoiding schools/health centers where feasible; schedule peak truck flows outside school start/finish and commuter peaks; implement just-in-time staging to prevent gate queuing; enforce</p>	

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			<p>site speed limits (e.g., 20 km/h inside, 30–50 km/h outside per posted limits). Traffic marshals at gates during peaks; dynamic dispatch via radio; coordinate with quarry dispatch to smooth arrivals.</p> <p>Vehicle standards & inspections. Mandatory pre-trip checks, monthly inspections (brakes, lights, tires), functioning audible alarms (reversing), flashing beacons, side under-run protection and blind-spot mirrors/cameras on heavy vehicles. Fleet supervisors will keep inspection logs; remove non-compliant vehicles from service; random road-side inspections by HSE.</p> <p>Pedestrian and cyclist protection. Separate pedestrian routes with barriers within the terminal; marked crossings; spotter/banksman required for reversing; no-go zones around loading areas; high-visibility PPE.</p> <p>Community interface controls. Advance notice to communities for exceptional convoys or night works; signage/warnings on local roads; hotline for traffic complaints integrated into GRM. CLO will issue notices via Mukhtar/municipal channels and social media; log/resolve complaints within defined timeframes.</p> <p>Fatigue and hours-of-service. Maximum driving hours/day and mandatory rest periods consistent with Turkish law and GIIP; prohibit mobile-phone use while driving. Transport managers will audit tachograph/GPS data; disciplinary actions for violations; quarterly compliance reports.</p> <p>Infrastructure & signage. Discuss with municipality to install speed humps, mirrors at blind corners, and night-visible signage; maintain road surfaces and clean spilled material promptly (in case Autoport is responsible).</p>	
Community Health & Safety	Dust, noise, vibration, traffic, and spills during piling, dredging, and material	High The risk is high because:	Contractor to develop and implement Air Quality, Noise & Vibration, Traffic, and Community Health & Safety Plans. These plans must be site-specific and address both worker and	Low

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
<p>(Neighboring Facilities)</p>	<p>transport may affect residents, schools, fishermen, and nearby industrial facilities (Ford Otosan, Yeniköy Industrial Site, Kosbaş Free Zone). Safety risks arise from heavy vehicle movements near settlements and from temporary works near the shoreline. Emergency preparedness of contractors and Autoport may be inadequate, increasing vulnerability of neighboring communities.</p>	<ul style="list-style-type: none"> • Communities and industrial neighbors are in close proximity to the port and exposed daily to its impacts. • Safety incidents (traffic accidents, spills, fires) could have immediate and severe consequences. • Sensitive receptors include residential neighborhoods, schools, and fishing areas — amplifying social visibility and reputational risks. 	<p>community interface risks, with measurable targets. Contractor will submit CESMP sub-plans before mobilization; Autoport ESMS Manager will review/approve; weekly joint inspections with Autoport.</p> <p>Emergency preparedness with neighbors. Coordinate with nearby facilities, local authorities, and emergency responders to ensure integration of response protocols (e.g., fire, chemical spill, earthquake).</p> <p>Community communication. Provide early warnings for high-risk activities (piling, dredging, blasting, exceptional convoys). Maintain open communication channels for concerns. Community Liaison Officer (CLO) will issue notices via Mukhtar, municipal channels, and Autoport website; grievance hotline active during construction.</p> <p>Noise and dust buffering. Install temporary noise barriers, vegetative buffers, and dust suppression along site boundary near residential areas. Contractor to implement before earthworks; Autoport ESMS will monitor effectiveness; adjust based on community feedback.</p> <p>Traffic interface. Manage vehicle access at site gates to prevent spillback into community roads; designate safe pedestrian paths around construction zones. Traffic marshals at peak hours; signage and road markings installed;</p> <p>Community health monitoring. Monitor noise, dust, and air quality in nearest neighborhoods and schools to track cumulative exposure. Accredited labs will conduct monthly monitoring; results shared with local authorities and community representatives.</p> <p>Social investment measures. Address community concerns (traffic, road safety, fishing restrictions) through Corporate Social Responsibility (CSR) initiatives. Autoport will discuss local road improvements with Municipality, provide traffic safety training in</p>	

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
			schools (as needed), and collaborate with fishing cooperatives on mitigation.	
Workers’ Health & Safety	<p>High-risk activities (piling, lifting, marine works, hot works, working at height, confined spaces, excavation, energized equipment) increase likelihood of fatalities/serious injuries. Interface risks with heavy vehicles/plant (reversing, blind spots) and marine operations (drowning, man-overboard) are elevated. Chemical exposure (fuels, solvents, cement), heat/cold stress, noise-induced hearing loss, vibration, dust (silica/PM) and ergonomic strains may occur. Weak permit-to-work and contractor supervision can lead to uncontrolled tasks and emergencies.</p>	<p>High The risk is high because:</p> <ul style="list-style-type: none"> • Consequence: Potential for life-changing injuries/fatalities and major legal/reputational impact. • Likelihood: Multiple concurrent high-risk tasks with subcontractors and rotating shifts. • Exposure: Large, mixed workforce incl. new/temporary workers; marine + land interfaces. • Controls dependency: Outcomes depend on robust systems (permits, supervision, training, LOTO, PPE, emergency response). 	<p>Develop the Occupational Health and Safety plan and Community Health and Safety plan to identify control measures necessary to protect workers and project-affected communities. OHS Plan to align with ISO 45001/IFC EHS; include risk assessment (HIRA/JSA), legal register, high-risk tasks procedures, competency/training matrix, inspections/audits, incident management, KPIs, and contractor control. Contractor will submit OHS Plan pre-mobilization;</p> <p>Ensure that contractors have developed and implemented construction health and safety management plans (CESMPs) in line with good international practices to manage the risks to all workers and project-affected communities. CESMPs to cover task-specific Method Statements and Job Safety Analyses for piling, lifting, marine access, excavation, WAH, confined spaces, hot work, energized work, traffic/plant. Pre-task briefings/toolbox talks daily; work cannot start without signed JSA and permit.</p> <p>For each port equipment, a detailed maintenance program needs to be developed and implemented. OEM-based preventive maintenance; critical equipment register; defect tagging and removal from service; brake/steering/lift-gear inspections; emergency stop testing. Maintenance CMMS with schedules; monthly compliance reports; random audits by Autoport Engineering & HSE.</p> <p>Permit-to-Work (PTW) & LOTO. Formal PTW for hot work, confined spaces, WAH, excavation, lifting near overhead lines, energization; LOTO for all isolation activities with verification and try-out. Issue PTW by authorized persons only; isolation lists & tags; periodic PTW audits; stop-work authority empowered.</p> <p>Lifting operations safety. Appointed lifting supervisor; certified</p>	Low

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
			<p>crane/rigging gear; exclusion zones; wind limits; tandem/complex lifts with specific lift plans. Pre-lift meeting; equipment certification registry; real-time anemometers; lift permits for non-routine lifts.</p> <p>Traffic & mobile plant interface. Segregated pedestrian routes, one-way systems, speed limits, banksmen for reversing, proximity alarms/cameras, high-vis PPE. Yard Traffic Plan issued; weekly compliance walks; incident heat-map reviews; corrective actions implemented.</p> <p>Marine works safety. Safe access to barges/pontoons; PFDs mandatory near water; rescue equipment (life rings, ladders); man-overboard drills; weather/sea-state limits. Marine toolbox talks; permit for over-side work; standby boat during high-risk activities.</p> <p>Exposure controls (noise, dust, chemicals). Hierarchy of controls—engineering (enclosures, mufflers), administrative (rotation), and PPE (hearing protection, RPE). Chemical handling with SDS, ventilation, and spill kits. Baseline & periodic monitoring (noise dosimetry, dust, VOCs); health surveillance (audiometry, spirometry) per risk.</p> <p>Heat/cold stress & ergonomics. Work/rest cycles, shaded rest areas, hydration plans; winter clothing and de-icing plans; manual handling training and aids. Supervisors to implement environmental monitoring; record heat index actions; report strains and adjust tasks.</p> <p>Competence, training, and induction. Role-specific induction; verification of licenses (crane, forklift, MEWP); GBVH/Code of Conduct; emergency response training. Training matrix maintained by HR/HSE; refresher frequencies defined; no card/no work policy.</p> <p>Incident management & learning. Immediate reporting; root-</p>	

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
			<p>cause analysis (ICAM); corrective/preventive actions; lessons-learned briefings. 24-hr reporting requirement; monthly incident review with management; trend analysis and targeted campaigns.</p> <p>Emergency preparedness. Site-specific ERP integrating fire, medical, chemical spill, severe weather, earthquake; drills (table-top + full-scale).</p>	
<p>Construction Equipment Usage</p>	<p>Operation of heavy mobile plant (excavators, loaders, dump trucks, cranes, concrete mixers/pumps, piling rigs, barges) increases likelihood of struck-by/crush incidents, rollovers, uncontrolled reversing, contact with overhead/underground services, hydraulic failures, flying debris from attachments, and uncontrolled loads. Poor maintenance elevates mechanical failure risk (brakes, steering, hoists). Emissions, noise, and vibration from equipment also affect workers and nearby receptors.</p>	<p>High The risk is high because:</p> <ul style="list-style-type: none"> • Consequence: High-energy equipment can cause fatal or life-changing injuries. • Likelihood: Continuous plant movements in constrained work fronts and mixed trades. • Exposure: Multiple contractors, varying competence, changing layouts, and marine–land interfaces. 	<p>Develop a Traffic Management Plan for the Project and all Port activities, including quarry usage during construction. TMP must cover internal plant movements, interface with public roads, segregated pedestrian routes, one-way systems, speed limits, dedicated marshalling areas, banksmen rules for reversing, and night-work controls. Contractor prepares TMP pre-mobilization; Autoport ESMS approves; gate and yard signage/markings installed before plant arrival; weekly joint inspections.</p> <p>Plant selection, certification & authorization. Use plant sized for task and ground conditions; lifting devices and accessories to be certified and within test date; operators licensed/authorized for specific equipment</p> <p>Preventive maintenance & pre-use checks. OEM-based preventive maintenance (brakes, steering, tires/tracks, hydraulics, slew bearings, hoists); daily pre-start checks documented by operators.</p> <p>Reversing & visibility controls. Fit reversing alarms, flashing beacons, cameras and proximity sensors on heavy equipment; mandatory banksman in congested zones; defined reversing bays.</p> <p>Ground conditions & stability. Assess bearing capacity/settlement for cranes and piling rigs; use</p>	<p>Low</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
			<p>matting/cribbing; define exclusion zones for swing radius and suspended loads.</p> <p>Lifting operations management. Appoint Lifting Supervisor; task-specific Lift Plans (incl. wind limits, tandem lifts, radius charts); certified rigging gear with unique IDs.</p> <p>Interface with utilities and marine works. Permit-to-dig for underground services; overhead line approach limits; for barges/pontoons: mooring integrity checks, access control, PFDs, rescue equipment.</p> <p>Night work & fatigue controls. Lux-level lighting plans for workfaces, glare control; hours-of-service limits and rest breaks; alcohol/drug testing; distraction (mobile phone) policy. Night-work permits; lighting inspections; tachograph/GPS audits; disciplinary actions for breaches.</p> <p>Pedestrian segregation & PPE. Barriers and marked walkways, designated crossings, no-go zones near swing areas; mandatory high-vis, safety footwear, helmets, eye/ear protection as task requires.</p> <p>Competency & supervision. Role-specific training (MEWP, forklift, crane), supervisor presence in high-risk areas, daily toolbox talks.</p>	
<p>Working Conditions</p>	<p>Workers may be exposed to substandard conditions including excessive noise and vibration, poor illumination, inadequate ventilation, thermal stress (heat/cold), dust and poor air quality inside enclosed workspaces, and poor welfare facilities. Long hours without</p>	<p>Medium Why Medium:</p> <ul style="list-style-type: none"> • Impacts affect worker well-being and productivity but are largely preventable through strong HR, OHS, and welfare controls. • Consequences 	<p>Maintain and implement the existing HSE management system . Extend HSE system to cover occupational exposure monitoring (noise, air, lighting, thermal comfort) and welfare audits. Contractor will implement workplace monitoring program pre-construction</p> <p>Develop and align a dedicated work permit procedure with a construction project. Organize training for the project construction contractor. Work permit system must cover high-risk tasks (hot works, confined spaces, excavation, work at</p>	<p>Low</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
	<p>monitoring risk overtime abuses, fatigue, and related accidents. Accommodation provided by subcontractors may not comply with IFC/EBRD standards (crowding, hygiene, fire safety). Lack of clear HR procedures could lead to discrimination, harassment, or grievances being ignored.</p>	<p>(injuries, illness, social unrest) are moderate but can escalate if issues persist. • IFC PS2 and EBRD PR2 require compliance with ILO standards and Turkish Labour Law, making gaps significant for compliance.</p>	<p>height). Contractor will issue permits daily; HSE to conduct weekly PTW audits; induction training for all supervisors/workers.</p> <p>Worker accommodation standards. Accommodation must comply with IFC/EBRD “Workers’ Accommodation: Processes and Standards” (2009). Covers space, hygiene, fire safety, gender-separated facilities, recreation. Contractor to submit camp management plan; Autoport to conduct quarterly audits; grievance channel for residents established.</p> <p>Working hours and overtime. Hours of work must comply with Turkish Labour Law (max 45 hrs/week, overtime capped, rest periods protected). Contractor HR to maintain time records; Autoport HR to audit monthly; publish anonymous summary to workers.</p> <p>Exposure controls. Baseline and periodic monitoring of noise, dust, illumination, and temperature; hierarchy of controls applied (engineering first, then administrative, then PPE). Accredited lab will conduct annual monitoring; results disclosed internally; corrective actions tracked.</p> <p>Equal opportunity and GBVH protection. HR policies must explicitly prohibit discrimination, harassment, and GBVH, with clear disciplinary measures. Autoport HR will issue updated policy; contractor induction includes GBVH awareness; grievance focal points trained.</p> <p>Worker voice and representation. Workers should be able to elect representatives; freedom of association respected. Autoport HR will facilitate elections; regular worker–management meetings; issues logged/resolved in follow-up tracker.</p> <p>Welfare and rest facilities. Adequate toilets, potable water, rest shelters, medical services, and catering facilities must be provided. Contractor will ensure facilities pre-mobilization;</p>	

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
Climate Change	<p>Extreme weather events (storms, heavy rainfall, flooding, heatwaves, cold snaps) may disrupt construction, damage temporary works, and increase accident risks. Sea-level fluctuations and storm surges could compromise reclamation stability. Workers exposed to heat/cold stress are at greater health risk.</p>	<p>High The risk is high because:</p> <ul style="list-style-type: none"> • Ports are long-life assets; climate risks extend beyond project lifetime. • Exposure to sea-level rise and storm surges in the Marmara region makes infrastructure inherently vulnerable. • Consequences include operational disruption, damage to port assets, safety risks for workers, and long-term financial loss. 	<p>Review and update the existing 2024 Climate Change Risk Analysis (İklim Degisikligi Risk Analzi) to include the planned expansion activities, in line with good international practice on adaptation such as EU guidance on climate proofing (e.g., Equator Principles CCRA Guidance). Assessment should include sea-level rise, storm surge, temperature extremes, precipitation changes, and wind patterns. Autoport will commission climate resilience consultant; report completed pre-construction; update every 5 years.</p> <p>Ensure that future port design incorporates acute and chronic climate change conditions. Design infrastructure for 1-in-100 year storm surge plus sea-level rise projections; reinforce quay walls, drainage, and breakwaters; ensure elevation of key assets. Autoport Engineering will integrate climate scenarios into design criteria; design reviewed by independent engineer; compliance confirmed prior to construction.</p> <p>Flood and stormwater resilience. Expand drainage capacity, retention basins, and pumping stations to handle extreme rainfall. Contractor will incorporate in CESMP; O&M to maintain pumps and drains quarterly.</p> <p>Heat and cold stress measures for workforce. Implement work-rest cycles, hydration programs, shaded shelters, warm clothing, and heating/cooling as appropriate. Contractor HSE will monitor heat index/cold stress daily; supervisors enforce breaks; records kept of interventions.</p> <p>Emergency preparedness for extreme weather. Update ERP to include storm surge, flooding, extreme winds, and heat events. Conduct annual extreme-weather drills; lessons incorporated into ERP updates.</p>	Negligible
Emergency Planning	Inadequate emergency preparedness during piling, marine works, hot works,	<p>High The risk is high because:•</p>	Carry out worst-case scenario exercises, an annual exercise with top management with various [scenarios]. Run table-top and full-scale drills covering fire, major spill, mass-casualty,	Low

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
	<p>fuel handling, and heavy lifting can lead to fires, explosions, major spills, structural collapse, man-overboard, severe weather incidents, earthquakes, and mass-casualty events. Weak contractor coordination (multiple subcontractors), unclear roles, lack of drills, and poor communications (alarms/radios) increase response time and consequence severity. Interface risks at the land–sea boundary (barges/pontoons) and at public road gateways heighten exposure of workers and community.</p>	<p>Consequence: Potential for multi-fatality events and major environmental harm (Tier-2/3 spills, structural failures, conflagrations).• Exposure: Continuous construction + 24/7 operations; hazardous substances; marine + land interfaces; neighboring facilities and communities. • Dependency: Outcomes hinge on the quality of planning, training, equipment readiness, and inter-agency coordination.</p>	<p>earthquake, and extreme weather; include muster/roll-call, ICS roles, communications, and post-incident recovery. HSE will publish an Annual Drill Calendar; at least 1 full-scale multi-agency drill/year; after-action reports with corrective actions tracked to closure in ESMS.</p> <p>Update the Emergency Response Plan (ERP) for the construction-operations phase interface, considering the risks related to the nearby ports. Single, integrated ICS-based ERP (gold/silver/bronze) covering command structure, hazard-specific annexes (fire, spill, earthquake, storm surge, blackouts, cyber impacts on OT), notification trees, mutual-aid triggers, and business continuity.</p> <p>Port facilities are designed to comply with the Turkish Earthquake Regulation. Seismic design and post-quake inspection protocols for quay walls, cranes, warehouses, pipe racks; automatic shut-off for fuel systems; safe-shutdown procedures. Engineering have issued seismic design basis; commissioning includes seismic acceptance tests; O&M will train on post-event inspections and red-tag/green-tag criteria.</p> <p>Marine spill preparedness (Tier-1/2 readiness). On-water spill kits (booms, skimmers, sorbents), shoreline protection plans, and agreements with OSR (Oil Spill Response) providers; drills with Coast Guard/Port Authority; once every six months boom-deployment drills; contracts with licensed responders; stocktake records.</p> <p>Alarm, communication & redundancy. Audible/visual alarms, VHF/DMR radios with dedicated emergency channel, PA systems, UPS/generator back-up for critical systems, and mass notification (SMS/app) to staff and neighbors.</p> <p>Training & competence. Role-based training for ICS leads, fire wardens, spill teams, first aiders, rescue boat operators; contractor</p>	

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
			<p>onboarding includes ERP orientation.Maintain competence matrix; refresher intervals (e.g., first aid yearly, spill team semi-annual); no-card/no-role policy.</p> <p>Muster, egress & crowd safety.Marked muster points, headcount/roll-call procedures, accessible egress routes, lighting for night evacuations; arrangements for visitors and persons with reduced mobility.</p> <p>Documentation & improvement cycle. Central Emergency Preparedness Register (drills, equipment tests, impairments, training, MOUs, after-action items). Monthly KPI dashboard to E&S Steering Committee (drill completion %, close-out rate, equipment uptime).</p>	
<p>Human Resource Policies & Working Relationships</p>	<p>Inadequate HR policies and weak communication of employment terms can result in unfair recruitment, discrimination, harassment, or exploitation. Contractors and subcontractors may fail to align with Autoport’s HR standards, causing labour disputes, strikes, or GBVH incidents. Lack of worker awareness of rights, grievance channels, or ethical policies undermines trust.</p>	<p>High The risk is high because:</p> <ul style="list-style-type: none"> • Consequence: Direct impact on worker welfare, legal compliance, and investor confidence. • Likelihood: Multiple contractors and subcontractors with varying standards; high workforce turnover. • Dependency: Risks depend on effective HR policies, training, and grievance enforcement. 	<p>Develop a formal procedure for implementing the HR policy applicable to both employees and non-employee workers covering, at a minimum: relevant National Law, IFC PS2 and EBRD PR2 requirements. HR policy must include recruitment, equal opportunity, anti-discrimination, GBVH, grievance, discipline, overtime, wages, benefits, and termination procedures. Autoport HR to finalize HR procedure before mobilization; contractors required to adopt; annual HR audit to check compliance.</p> <p>Develop an onboarding package including written induction training for the expansion project and provide it to all new workers, contractors, subcontractors, and visitors. Onboarding must include Code of Conduct, GBVH policy, worker rights, safety obligations, grievance process, and community behavior expectations.</p> <p>Elect worker representatives who are freely elected by the workers in accordance with national laws. Workers must be able to elect representatives without management interference. Autoport HR will facilitate election process; ensure representatives attend monthly worker–management forums; maintain minutes/action logs.</p>	<p>Negligible</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
			<p>Establish a corporate approach/policy/procedure on working hours, overtime, remuneration, working hours recording and control, and overtime reporting. Align with Turkish Labour Law (max 45 hours/week) and ILO standards; require accurate digital tracking. Contractors will implement biometric or electronic attendance systems; Autoport HR will audit monthly; overtime trends reported to lenders.</p> <p>Assign HR staff with appropriate qualifications, experienced in labour compliance, empowered to manage and monitor labour issues including contractor/subcontractor compliance. Dedicated HR staff must cover recruitment, wages, accommodation, grievance, GBVH, and ILO compliance. Autoport will appoint Assistant HR manager; contractor HR staff vetted; quarterly HR performance review meetings.</p> <p>Improve the worker Code of Conduct to be in line with EBRD PR2 and IFC PS2, describing expectations for behavior inside and outside the workplace, including GBVH provisions. Code must cover harassment, violence, community interaction, substance abuse, and environmental respect. Autoport HR will issue updated Code pre-mobilization; training for all workers; breach leads to disciplinary action up to termination.</p> <p>Contractor alignment. Require contractors to sign binding HR compliance agreements. HR audits extended to contractor camps/sites; non-compliance tied to payment milestones.</p> <p>Communication and awareness. Workers must receive policies in local language and through oral briefings for illiterate staff. Contractors will distribute handbooks and posters; Autoport HR to verify understanding via interviews.</p>	

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
<p>Wages, Benefits & Accommodation</p>	<p>Subcontractor workers may face non-compliance with Turkish Labour Law and ILO Conventions on wages, overtime, and benefits. Risks include underpayment, delayed wages, excessive overtime, denial of leave, and poor accommodation standards (overcrowding, poor sanitation, lack of fire safety). These conditions may cause labour unrest, high turnover, GBVH risks, or reputational damage.</p>	<p>High The risk is high because:</p> <ul style="list-style-type: none"> • Consequence: Worker exploitation or poor accommodation can trigger strikes, legal penalties, and reputational harm. • Likelihood: High, given multiple subcontractors and temporary workforce. • Receptor sensitivity: IFC/EBRD clients and ILO conventions prioritize labour rights, making breaches highly visible. 	<p>Ensure daily working hours (regular + overtime), weekly working hours, and other aspects are in line with Turkish regulations and ILO standards. Hours limited to 45/week; overtime capped and compensated; mandatory weekly rest; holiday entitlements enforced.</p> <p>Overtime policies communicated and monitored by site management; ensure compliance of contractors. Written overtime policy shared in worker language; track overtime trends. Autoport HR will require reporting by contractors; trend analysis in quarterly HR review; corrective actions for repeat offenders.</p> <p>Establish a camp management plan and monitoring program to ensure accommodation complies with IFC/EBRD “Workers’ Accommodation: Process and Standards.” Standards include minimum space per worker, sanitation facilities, potable water, adequate lighting/ventilation, fire safety, gender-segregated facilities, and recreation. Contractor will submit camp plan pre-mobilization .</p> <p>Wage and benefits compliance. Verify payrolls for minimum wage, social security, health insurance, and benefits in compliance with Turkish law. Contractor HR will submit payroll audits quarterly; Autoport HR will cross-check against legal minimums; wage slips provided to workers in local language.</p> <p>Transparent payment systems. Require electronic wage transfers (not cash-in-hand) to prevent wage theft. Autoport HR will verify bank transfer records monthly; discrepancies escalated to E&S Steering Committee.</p> <p>Worker feedback and grievance. Workers must have accessible grievance channels for wage/accommodation issues, with option for anonymity. Contractors will provide complaint boxes in camps; Autoport HR to manage hotline; issues resolved within 14 days.</p>	<p>Negligible</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
			<p>Third-party inspections. Independent audits of accommodation and payroll systems to ensure compliance. Autoport will commission independent HR audits annually; findings shared with lenders/regulators only for the construction phase.</p>	
<p>Grievance Mechanism</p>	<p>Without a clear grievance mechanism, workers (employees, contractors, subcontractors) may lack safe channels to report unsafe conditions, wage violations, GBVH, or discrimination. Community members affected by dust, noise, traffic, or fishing restrictions may be left without recourse. Unaddressed grievances may escalate into strikes, protests, reputational harm, or legal claims.</p>	<p>Medium Why Medium: <ul style="list-style-type: none"> • Consequence: Lack of grievance channels can create significant social tension and escalate to disruption. • Likelihood: High if not formalized, but risks can be substantially reduced with a strong system. • Visibility: Lenders (EBRD/IFC) and regulators require grievance mechanisms; gaps are highly scrutinized. </p>	<p>Develop a written grievance procedure describing how different communication channels work for handling grievances, including HR and management responsibilities. System must cover workers, contractors, subcontractors, and community stakeholders. Channels should allow anonymous reporting, be available in local language, and include clear escalation steps. Autoport HR/E&S team will prepare procedure; contractors will be required to adopt; procedure distributed via posters, inductions, and website.</p> <p>Grievance mechanism should allow anonymous complaints. Anonymous reporting options reduce fear of retaliation, especially for GBVH cases. Install complaint boxes at site and worker camps; set up dedicated hotline and email; assign neutral focal points.</p> <p>Implement specific reporting lines and documented grievance mechanism for discrimination and GBVH, using a survivor-centred approach. GBVH grievances require confidentiality, choice of reporting path, referral to support services, and protection from retaliation. Train GBVH focal points; establish referral pathways with NGOs/health services; ensure multiple options for complainants.</p> <p>Define a grievance channel for contractors and subcontractors in Autoport’s grievance procedure. Contractors’ workers must have equal access; their grievances tracked and resolved through Autoport’s central system. Contractors will designate grievance representatives; monthly log of grievances submitted to Autoport HR.</p>	<p>Negligible</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
			<p>Community grievance integration. Community grievances (traffic, dust, noise, fishing access) should feed into the same central system. CLO will record and track community complaints; quarterly disclosure of grievance trends and resolutions to stakeholders.</p> <p>Monitoring and learning. Regular review of grievance data to identify systemic issues and improve practices. Monthly review by Autoport HR/E&S; annual report to lenders including grievance statistics, resolution rates, and lessons learned.</p>	
<p>Subcontractor Management</p>		<p>High The risk is high because:</p> <ul style="list-style-type: none"> • Consequence: Subcontractor misconduct creates direct reputational, legal, and financial exposure for Autoport. • Likelihood: High due to reliance on multiple subcontractors for both construction • • Visibility: Lenders, regulators, and NGOs hold Autoport accountable for subcontractor actions. 	<p>Enhance the existing Contractor Conformity Assessment and Working Instruction to ensure that the performance of contractors is managed and monitored according to the requirements of PR2. Assessment should cover HR, OHS, environmental management, and GBVH compliance. Autoport Procurement & HR will update assessment tool; apply pre-qualification for all subcontractors; quarterly monitoring audits.</p> <p>Contractual obligations. All subcontract agreements must include binding clauses requiring compliance with Turkish law, IFC PS2, EBRD PR2, and Autoport’s ESMS. Autoport Legal to standardize contracts; non-compliance triggers corrective action or contract termination.</p> <p>Pre-qualification and due diligence. Screen subcontractors for past compliance, certifications, and workforce practices before award. Autoport Procurement to conduct due diligence; record results in supplier database; approval by E&S Manager.</p> <p>Training and induction. Subcontractor staff must receive induction covering OHS, HR, GBVH, grievance mechanisms, and community interaction. Autoport HR/HSE will run induction; attendance tracked; refresher courses every 6 months.</p>	<p>Negligible</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
			<p>Monitoring and inspections. Routine site inspections and performance reviews, covering HR compliance, accommodation, OHS, and environmental management. Autoport HR/E&S will conduct monthly audits; corrective actions logged and tracked; serious breaches escalated.</p> <p>Payment linked to compliance. Autoport will impose penalties in accordance with the Health, Safety, and Environment Penalty Procedure communicated to the Contractor. Issues identified on-site by the Autoport inspection team will be notified to the Contractor as penalties, which will be deducted from their end-of-month payment.</p> <p>Grievance accessibility. Subcontractor workers must have equal access to grievance mechanisms (HR, GBVH, anonymous channels). Contractors will be required to notify workers of channels; Autoport HR to track grievances monthly.</p> <p>Annual independent audits. Engage third-party auditors to verify subcontractor compliance with IFC/EBRD labour and E&S standards. Autoport to commission annual audits; results shared with lenders; corrective action plans monitored during construction phase.,</p>	
<p>Stakeholder Engagement & Information Disclosure</p>	<p>If stakeholder engagement is weak, affected communities (Sepetlipinar residents, fishermen, NGOs, municipalities, neighboring industries) may not receive timely or accurate information about impacts (traffic, dust, noise, access restrictions). Lack of transparency may create mistrust, opposition, protests, and legal challenges. PAPs</p>	<p>High The risk is high because:</p> <ul style="list-style-type: none"> • Consequence: Stakeholder opposition can delay or halt construction and create reputational risk with financiers. • Likelihood: High, given existing sensitivities (traffic 	<p>Prepare leaflets/brochures, a non-technical summary (NTS) of the Project (including grievance management and impacts on fishing, noise, traffic) in a user-friendly language and disclose in public areas. Use visuals, local language, and distribution via Mukhtar offices, schools, fishermen associations, and municipal halls. Autoport CLO will update quarterly; verify distribution via stakeholder sign-off; provide online versions.</p> <p>Prepare and disclose SEP, NTS, and brochures on the website. SEP must include engagement strategy, frequency, and responsibilities for all stakeholder groups (residents, NGOs, regulators, lenders, businesses).</p>	<p>Negligible</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
	<p>may not know about grievance mechanisms, limiting conflict resolution.</p>	<p>congestion, fishing restrictions). • Visibility: Lenders, regulators, and NGOs require proactive, documented engagement.</p>	<p>Autoport E&S team to publish SEP pre-construction; update annually; progress shared in annual sustainability reports.</p> <p>Implement SEP and record a separate follow-up list for complaints received. Maintain a transparent complaints log, publicly reporting number, type, and resolution of grievances. CLO will update log monthly; summary shared with community and lenders quarterly.</p> <p>Ongoing engagement forums. Establish regular forums with PAPs (residents, fishermen, NGOs, neighboring industries). Topics include traffic mitigation, fishing impacts, safety updates, and monitoring results. CLO will hold forums every 6 months; minutes documented and shared; corrective actions tracked.</p> <p>Media and communication channels. Use local newspapers, radio, TV, and social media for wider project updates. Autoport Communications will issue monthly updates; monitor public feedback and address misinformation.</p> <p>NGO and regulator engagement. Regular briefings with NGOs, unions, and regulators on E&S performance. Autoport ESMS team will issue semi-annual performance briefings; disclose monitoring data (air, water, noise).</p> <p>Fisherfolk engagement. Maintain structured dialogue with fishermen associations CLO will hold meetings; outcomes documented; explore joint initiatives</p>	
<p>Gender-Based Violence & Harassment (GBVH)</p>	<p>Large influx of male construction workers, subcontractors, and truck drivers increases risks of harassment, assault, or exploitation of women in host communities and within</p>	<p>High The risk is high because: • Consequence: GBVH incidents can cause trauma, unsafe workplaces, and</p>	<p>Provide induction and periodic (annual) training to employees and contractors on GBVH, Code of Conduct provisions, and grievance mechanism procedures. Training should cover definitions, examples, reporting options, survivor rights, and disciplinary consequences. Autoport HR will integrate GBVH into induction; refresher annually; attendance logs maintained; toolbox talks addressing respectful workplace.</p>	<p>Low</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
	<p>the workforce. Lack of policies, weak supervision, and absence of safe reporting channels can normalize abusive behaviors.</p>	<p>severe reputational/financial harm.</p> <ul style="list-style-type: none"> • Likelihood: Elevated in large, male-dominated infrastructure projects with multiple contractors. • Visibility: EBRD PR2 and IFC PS2 specifically require GBVH risk prevention and survivor-centered grievance processes. 	<p>Provide training to managers, HR, and focal points on how to respond to and investigate allegations of sexual harassment in the workplace and by/toward community members. Training should emphasize confidentiality, non-retaliation, survivor-centered approaches, and legal obligations. External GBVH specialists will conduct sessions; managers trained before mobilization; periodic refresher every 2 years.</p> <p>Strengthened Code of Conduct. Code must clearly prohibit all forms of GBVH, including off-duty conduct that impacts the community. Violations must result in clear disciplinary action. Autoport HR will issue updated Code in local language; contractors required to adopt; breaches tracked and disclosed to management/lenders.</p> <p>Survivor-centered grievance mechanism. Provide multiple, confidential, and anonymous reporting channels; ensure survivors control decision on escalation/referral. Train grievance focal points (incl. female representatives); establish referral pathways with health/legal/NGO services; CLO will coordinate external support.</p> <p>Community protection measures. Conduct awareness sessions in host communities to prevent harassment around port perimeters and worker accommodations. CLO will hold quarterly outreach with community;</p> <p>Monitoring & reporting. Track GBVH grievances, outcomes, and lessons learned while maintaining survivor confidentiality. HR/ESMS team to submit quarterly GBVH performance summaries (number of trainings, grievances received/resolved) to E&S Steering Committee will disclose to lenders in annual reports.</p>	

Table 5-2 Potential E&S of The Project During Operation and Proposed Mitigation Measures

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
<p>Management Systems</p>	<p>Expansion increases vessel calls, truck volumes, storage and handling of cargoes, and hazardous material management. Risks include inadequate monitoring of air/noise, wastewater, fatigue management, gaps in emergency preparedness, and weak stakeholder engagement.</p>	<p>High The risk is high because:</p> <ul style="list-style-type: none"> • operation have complex activities with significant potential to affect sensitive receptors (settlements, fisherfolk, schools, marine ecosystems). • Without integration of construction-phase into ESMS, compliance with EBRD/IFC standards may fail. • Unmanaged contractor performance could lead to accidents, regulatory violations, reputational harm, and project delays. 	<p>Update Autoport ESMS to manage existing and potential environmental and social risks and impacts.</p> <ul style="list-style-type: none"> • Integrate construction and operation to be aligned with ISO 14001/45001 <p>Prepare/update policies and ESMPs for project.</p> <ul style="list-style-type: none"> • update ESMP covering E&S issues (air, noise, waste, OHS, GBVH, stakeholder engagement, climate). <p>Develop Supply Chain Management Systems</p> <ul style="list-style-type: none"> • Supply chain policy , transport, waste handlers; ensure compliance with Turkish law and IFC/EBRD. • Procurement needs included E&S clauses in contracts (already conducted) <p>Prepare and implement ESMP with monitoring plan in line with EIA and IFC/EBRD.</p> <ul style="list-style-type: none"> • Include measurable targets (e.g., zero lost-time injuries, noise <55 dB(A) 	<p>Low</p>
<p>Additional E&S Assessments</p>	<p>Long-term impacts are insufficiently assessed: road traffic congestion and safety,</p>	<p>High The risk is high because:</p> <ul style="list-style-type: none"> • Missing baselines 	<p>GBVH Risk Assessment: Identify risks of worker-community interactions and design Code of Conduct and training. Autoport HR and E&S teams need to develop GBVH protocol pre-construction; contractors to train all staff.</p>	<p>Low</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
	<p>labour rights and GBVH risks, cumulative noise and air emissions, and ongoing marine water quality. Without supplementary studies, Autoport risks underestimating community, worker, and biodiversity impacts.</p>	<p>make prediction unreliable.</p> <ul style="list-style-type: none"> Without studies, mitigation may be ineffective, leaving sensitive receptors (residents, fisherfolk, ecosystems) exposed. Non-compliance with IFC/EBRD could result in financing delays, regulatory rejection, or stakeholder opposition. 	<p>Labour Rights Assessment. Review compliance with Turkish Labour Law, ILO conventions, and IFC PS2. Contractor HR should monitor hours, overtime, wages while Autoport needs to audit contractors quarterly. be modified (e.g., bubble curtains) if thresholds exceeded.</p> <p>Traffic Risk Assessment. Assess heavy truck impacts on municipal roads, accident risk. This should include quarry-to-port routes and contractor need to provide defensive driving training;</p> <p>OHS and Process Safety Assessment. Assess operational port process safety risks. .</p>	
<p>Permit Requirements</p>	<p>Expanded port operations require revised permits for air emissions, wastewater discharge, waste management, hazardous materials storage, and occupational safety. Failure to update permits could lead to regulatory fines, suspension of operations, or legal liabilities.</p>	<p>High The risk is high because:</p> <ul style="list-style-type: none"> Permits are legally binding and essential for construction and operations. Non-compliance leads directly to work stoppages, legal sanctions, or denial of operation. Permit-related delays can jeopardize financing agreements with EBRD/IFC and damage reputation with authorities. 	<p>Develop and maintain an E&S compliance register to document all applicable legal requirements, including relevant permits, licenses, registrations, and approvals. The register should be digital, updated quarterly, and include deadlines for renewals. Autoport Legal/Compliance will maintain register; internal compliance checks will be conducted every quarter; summary report to management board.</p> <p>All operating permit registrations will need to be revised to accommodate the expansion of the port. Updates include air emission permits, wastewater discharge limits, waste handling permits, oil storage approvals, port operating license. Autoport O&M Department will initiate revisions 12 months before commissioning</p> <p>Assign dedicated compliance officer. A compliance officer ensures timely submission and renewal of permits. Compliance officer will be appointed by Autoport Management; monthly dashboard tracking permit status will be shared with E&S Steering Committee.</p>	<p>Negligible</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
			<p>Conduct annual legal compliance audits. Independent auditors review compliance against Turkish law and IFC/EBRD standards. Autoport will commission annual legal audit; findings will be integrated into ESMS improvement plan.</p>	
<p>Air Quality</p>	<p>Expanded port operations will increase vessel calls, truck movements, and cargo handling, raising emissions of SO₂, NO_x, CO, and PM. If unmonitored, these cumulative emissions may exceed Turkish Air Quality Standards and IFC/WBG EHS guidelines.</p>	<p>Medium The risk is medium because:</p> <ul style="list-style-type: none"> Operational emissions are continuous but manageable with proper mitigation. Exceedances of IFC EHS guideline values (PM₁₀: 50 µg/m³ daily; PM_{2.5}: 25 µg/m³ daily) could result in community complaints and regulatory penalties. 	<p>Continue to undertake periodic air quality monitoring as per the regulatory requirements. Monitoring extended to operational phase, with parameters SO₂, NO_x, PM₁₀/PM_{2.5}; data compared against Turkish and IFC EHS standards.</p> <p>Low-emission equipment. Require Tier III/IV compliant engines or equivalent; mandate low-sulfur diesel fuel.</p> <p>Community protection. Inform local community in advance of high-dust activities; establish grievance hotline for air complaints. Autoport Community Liaison Officer (CLO) will manage notifications and grievance log.</p>	<p>Negligible</p>
<p>Noise and Vibration</p>	<p>Increased vessel calls, cargo handling (cranes, forklifts), and truck movements raise continuous ambient noise levels. If unmanaged, these may exceed IFC/WBG EHS guideline values (55 dB(A) daytime, 45 dB(A) nighttime) and Turkish noise regulations, leading to community complaints and potential regulatory non-compliance.</p>	<p>Medium The risk is medium because:</p> <ul style="list-style-type: none"> Operational noise is continuous and cumulative, requiring monitoring and mitigation to protect sensitive receptors. Exceedance of IFC EHS thresholds could damage Autoport’s relationship with local communities and fisheries. 	<p>Community protection. Inform residents and stakeholders before noisy activities; provide hotline for complaints. Autoport Community Liaison Officer will coordinate notifications and track grievances.</p>	<p>Low</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
<p>Geology, Soils, and Groundwater</p>	<p>Expanded port facilities (fuel storage tanks, workshops, waste handling areas) present ongoing risks of spills and leaks. If containment is inadequate, hazardous materials may infiltrate soil and groundwater, creating long-term contamination liabilities and regulatory non-compliance.</p>	<p>Medium The risk is medium because:</p> <ul style="list-style-type: none"> • Soil and groundwater contamination tends to be localized, but impacts can be long-term and costly to remediate. • Contamination could also affect surface waters through runoff, impacting marine biodiversity and fisheries. • Poor controls increase liability for clean-up under Turkish law and IFC EHS standards. 	<p>Develop and implement a hazardous material management plan for the construction phase as per ESMP. Plan must specify safe storage, handling, labeling, transport, and disposal of hazardous substances.</p> <p>Maintain and implement the existing HSE management system for the operational phase and expand it to incorporate the Project construction and operation. Extend HSE procedures to cover hazardous material registers, secondary containment, and spill prevention. Autoport O&M team will update HSE manuals; quarterly inspections of chemical/fuel storage areas will be conducted with annual refresher training for staff.</p> <p>Secondary containment.All fuel and chemical tanks must be banded to 110% of tank capacity. Contractor will install bunds before commissioning storage areas; Autoport ESMS team will verify compliance.</p> <p>Spill prevention and response. Spill kits and emergency procedures must be available at all hazardous storage and handling points.</p>	<p>Negligible</p>
<p>Surface Water</p>	<p>Expanded paved surfaces and port facilities increase stormwater runoff, potentially contaminated with oil, grease, and heavy metals. If untreated, this discharge into the sea could degrade water quality, affecting marine ecosystems and fisheries, and result in non-compliance with Turkish</p>	<p>High The risk is high because:</p> <ul style="list-style-type: none"> • The port is directly adjacent to sensitive marine ecosystems and fishing grounds. • Pollution of surface water has immediate impacts on biodiversity, fisheries, and community livelihoods. 	<p>Develop and implement surface runoff (i.e. stormwater) management plan. Plan should address collection, treatment, and monitoring of stormwater, including design of drains and retention ponds. Contractor will prepare plan pre-construction;</p> <p>Build a spill containment system, including oil and water separator system at the end of the surface water drainage points that are located before discharge to the sea environment. Oil-water separators must meet Turkish standards ! Contractor will install separators before operational phase; O&M team will maintain quarterly; discharge quality tested once every six months monthly.</p>	<p>Negligible</p>

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	<p>discharge standards and IFC/WBG EHS guidelines.</p>	<ul style="list-style-type: none"> • Failure to control discharges can lead to regulatory violations, fines, and reputational harm with stakeholders 	<p>Periodically test the stormwater discharge to ensure that the water quality is acceptable for discharge. Parameters include COD, TSS, oil & grease, heavy metals. Accredited lab will conduct sampling monthly during construction and every six months during operation; results submitted to MoEUCC.</p> <p>Emergency spill response. All stormwater outlets must have shut-off valves in case of major spill. Contractor will install valves pre-operation; Autoport O&M to test during drills; CLO to inform community in case of significant incident.</p> <p>Marine water quality monitoring. Monitor turbidity, oil & grease, nutrients, and heavy metals in nearshore waters. Independent marine consultant will sample quarterly; results disclosed to stakeholders and shared with fisheries associations.</p>	
<p>Biodiversity</p>	<p>: Expanded port operations increase vessel traffic, underwater noise, ballast water discharge, and lighting impacts, all of which can disturb migratory species and reduce fish stocks. Restrictions on fishing zones near the port reduce available fishing grounds, impacting local livelihoods</p>	<p>High The risk is high because:</p> <ul style="list-style-type: none"> • Marine ecosystems near the port are ecologically sensitive and economically important for fisheries. • Biodiversity impacts may be irreversible (habitat loss) or cumulative (noise, turbidity, lighting). • Negative impacts on fish and marine mammals can create long-term community opposition and reputational risks. 	<p>Develop a biodiversity management plan. Plan should address operational biodiversity risks, including habitat protection, species monitoring, and compensation for habitat loss. Biodiversity expert will prepare plan before construction;</p>	<p>Low</p>

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<p>Waste</p>	<p>Expanded operations increase solid waste (domestic, packaging, maintenance waste) and hazardous waste (oil sludge, oily bilge, chemicals). If waste segregation, storage, and disposal are inadequate, the port risks non-compliance with Turkish Waste Management Regulations and IFC/WBG EHS Guidelines.</p>	<p>High The risk is high because:</p> <ul style="list-style-type: none"> • Poor waste handling can cause environmental pollution, community health hazards, and regulatory penalties. • Hazardous waste mismanagement creates long-term liabilities and reputational risks. 	<p>Licensed waste contractors. All waste, especially hazardous waste, must be transferred to İZAYDAŞ or other licensed operators. Contractor and Autoport will contract only licensed waste handlers; keep transfer manifests for auditing.</p> <p>Waste minimization and recycling. Promote reduction and recycling of packaging, scrap metals, and plastics. Contractor will establish recycling points onsite; Autoport O&M will track volumes recycled annually.</p> <p>Hazardous waste storage. Store hazardous waste in sealed, bunded areas with impermeable flooring. Contractor will designate storage zones; ESMS Officer to inspect weekly; emergency procedures posted visibly.</p> <p>Worker training. Train workers on segregation, labeling, and handling of hazardous vs. non-hazardous waste. Contractor HSE team will conduct induction training and refresher every 6 months; attendance logs kept.</p> <p>Monitoring and disclosure. Track all waste volumes by type; disclose in sustainability reports. Autoport ESMS will prepare quarterly waste statistics</p>	<p>Low</p>
<p>Hazardous Material</p>	<p>Operational phase risks: Expanded port operations increase the volume of hazardous substances (fuels, lubricants, cleaning chemicals, oily wastes). Inadequate storage and handling could cause long-term contamination, explosions, or worker/community safety risks.</p>	<p>Medium The risk is medium because:</p> <ul style="list-style-type: none"> • Hazards are localized but can cause severe accidents or pollution events if controls fail. • Improper hazardous material handling directly violates Turkish regulations and IFC/WBG EHS 	<p>Secondary containment. All tanks and drums must be placed in bunded areas with impermeable flooring to 110% capacity. Contractor will build bunds before chemical delivery; Autoport E&S will verify; quarterly inspection records.</p> <p>Spill prevention and response. Spill kits, absorbents, and emergency shut-off valves must be installed at all storage and handling points. Contractor will provide kits; workers trained in spill response during induction; Autoport will organize quarterly spill drills.</p> <p>Fire safety. Hazardous material storage must have fire detection, extinguishers, and separation of incompatible materials (e.g., fuels</p>	<p>Negligible</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
		<p>Guidelines.</p> <ul style="list-style-type: none"> • Effective controls (containment, MSDS, training) can significantly reduce risk. 	<p>vs. oxidizers). Contractor will install fire systems pre-mobilization; Autoport Fire Safety Officer will inspect monthly.</p> <p>Transport and disposal. Hazardous wastes (oils, solvents, chemicals) must be transported by licensed contractors with proper manifests.</p> <p>Autoport will contract only licensed handlers (e.g., İZAYDAŞ); Autoport ESMS to maintain records of transfers.</p> <p>Worker training. Train all staff in hazardous material handling, PPE, and emergency procedures. Contractor HSE will provide induction and semi-annual refresher courses;</p>	
<p>Traffic</p>	<p>Increased truck traffic for cargo handling and higher internal yard movements (forklifts, reach stackers, terminal tractors) raise ongoing road safety risks, noise/air emissions, and community nuisance. Night operations may heighten fatigue-related incidents; poor separation of pedestrian routes and vehicle paths inside the terminal increases strike-by hazards.</p>	<p>High</p> <p>The risk is high because:</p> <ul style="list-style-type: none"> • Likelihood: High daily truck volumes over a prolonged period (operation) on mixed-use public roads. • Consequence: Potential for severe injury/fatality, multi-vehicle incidents, and secondary impacts (spills, community disruption). • Receptor sensitivity: Residential streets, schools, fishermen using coastal roads/launch points. • Cumulative exposure: Overlaps 	<p>Community Health & Safety Plan (ESMP), and a Traffic Management Plan (TMP) . Integrate road safety engineering controls (routing, signage, speed limits), operational controls (scheduling, staging, marshaling), and behavioral controls (training, enforcement).</p> <p>Road safety policy, practices, and procedures including a defensive driving training program for own drivers, earthmoving, and concrete mixer drivers.</p> <p>Defensive driving, fatigue management, safe following distances, speed discipline, blind-spot awareness, reversing controls (banksmen/spotters), winter driving, and night operations. Autoport will deliver induction plus annual refreshers; verify driver certifications; maintain training logs; conduct periodic ride-along audits.</p> <p>Assess the driving skills of heavy-vehicle drivers before hiring and the skills of existing drivers. Pre-employment road test on project-specific routes; simulator or closed-course evaluation for high-risk vehicles (articulated dumpers, mixers). Autoport HSE & Transport Supervisors will document assessments; re-tests after incidents or long absences.</p> <p>Monitor and analyze third-party road accidents and incidents related to construction activities. Establish an incident database</p>	

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		<p>with air/noise impacts and existing industrial traffic in the corridor.</p>	<p>covering near misses, community complaints, and police reports; analyze hotspots and time-of-day patterns; implement corrective actions. CLO & HSE to compile monthly KPI dashboard (accident rates per 100k km, speeding violations, near misses); review at E&S Steering Committee; communicate trends to Municipality and community.</p> <p>Haul-route management & scheduling. Designate approved haul routes avoiding schools/health centers where feasible; schedule peak truck flows outside school start/finish and commuter peaks; implement just-in-time staging to prevent gate queuing; enforce site speed limits (e.g., 20 km/h inside, 30–50 km/h outside per posted limits). Traffic marshals at gates during peaks; dynamic dispatch via radio; coordinate with quarry dispatch to smooth arrivals.</p> <p>Vehicle standards & inspections. Mandatory pre-trip checks, monthly inspections (brakes, lights, tires), functioning audible alarms (reversing), flashing beacons, side under-run protection and blind-spot mirrors/cameras on heavy vehicles. Fleet supervisors will keep inspection logs; remove non-compliant vehicles from service; random road-side inspections by HSE.</p> <p>Pedestrian and cyclist protection. Separate pedestrian routes with barriers within the terminal; marked crossings; spotter/banksman required for reversing; no-go zones around loading areas; high-visibility PPE.</p> <p>Community interface controls. Advance notice to communities for exceptional convoys or night works; signage/warnings on local roads; hotline for traffic complaints integrated into GRM. CLO will issue notices via Mukhtar/municipal channels and social media; log/resolve complaints within defined timeframes.</p> <p>Fatigue and hours-of-service. Maximum driving hours/day and mandatory rest periods consistent with Turkish law and GIIP; prohibit mobile-phone use while driving. Transport managers will</p>	

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			<p>audit tachograph/GPS data; disciplinary actions for violations; quarterly compliance reports.</p> <p>Infrastructure & signage. Discuss with municipality to install speed humps, mirrors at blind corners, and night-visible signage; maintain road surfaces and clean spilled material promptly (in case Autoport is responsible).</p>	
<p>Community Health & Safety (Neighboring Facilities)</p>	<p>Increased vessel and truck traffic, continuous emissions, noise, and port lighting affect adjacent communities. Risk of fire, chemical spills, or accidents in expanded operations could threaten workers in neighboring facilities and residents. If community engagement and emergency preparedness are weak, distrust and opposition may grow.</p>	<p>High The risk is high because:</p> <ul style="list-style-type: none"> • Communities and industrial neighbors are in close proximity to the port and exposed daily to its impacts. • Safety incidents (traffic accidents, spills, fires) could have immediate and severe consequences. • Sensitive receptors include residential neighborhoods, schools, and fishing areas — amplifying social visibility and reputational risks. 	<p>Emergency preparedness with neighbors. Coordinate with nearby facilities, local authorities, and emergency responders to ensure integration of response protocols (e.g., fire, chemical spill, earthquake).</p> <p>Community communication. Provide early warnings for high-risk activities (exceptional convoys). Maintain open communication channels for concerns. Community Liaison Officer (CLO) will issue notices via Mukhtar, municipal channels, and Autoport website; grievance hotline active during construction and operation.</p> <p>Traffic interface. Manage vehicle access at site gates to prevent spillback into community roads; designate safe pedestrian paths around construction zones. Traffic marshals at peak hours; signage and road markings installed;</p> <p>Community health monitoring. Monitor noise, dust, and air quality in nearest neighborhoods and schools to track cumulative exposure. Accredited labs will conduct monthly monitoring; results shared with local authorities and community representatives.</p> <p>Social investment measures. Address community concerns (traffic, road safety, fishing restrictions) through Corporate Social Responsibility (CSR) initiatives. Autoport will discuss local road improvements with Municipality, provide traffic safety training in schools (as needed), and collaborate with fishing cooperatives on mitigation.</p>	<p>Low</p>
<p>Workers’ Health & Safety</p>	<p>Expanded terminal operations raise exposure to</p>	<p>High The risk is high</p>	<p>Develop the Occupational Health and Safety plan and Community Health and Safety plan to identify control</p>	<p>Low</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
	<p>struck-by/crush incidents (cranes, RTGs, reach stackers, forklifts), fatigue from shift work/night operations, electrical/process safety hazards in workshops and fueling areas, and routine exposures (noise, diesel exhaust, oily surfaces/slips). Inadequate preventive maintenance and weak lockout/tagout (LOTO) increase incident potential.</p>	<p>because:</p> <ul style="list-style-type: none"> • Consequence: Potential for life-changing injuries/fatalities and major legal/reputational impact. • Likelihood: Multiple concurrent high-risk tasks with subcontractors and rotating shifts. • Exposure: Large, mixed workforce incl. new/temporary workers; marine + land interfaces. • Controls dependency: Outcomes depend on robust systems (permits, supervision, training, LOTO, PPE, emergency response). 	<p>measures necessary to protect workers and project-affected communities. OHS Plan to align with ISO 45001/IFC EHS; include risk assessment (HIRA/JSA), legal register, high-risk tasks procedures, competency/training matrix, inspections/audits, incident management, KPIs, and contractor control. Contractor will submit OHS Plan pre-mobilization;</p> <p>For each port equipment, a detailed maintenance program needs to be developed and implemented. OEM-based preventive maintenance; critical equipment register; defect tagging and removal from service; brake/steering/lift-gear inspections; emergency stop testing. Maintenance CMMS with schedules; monthly compliance reports; random audits by Autoport Engineering & HSE.</p> <p>Permit-to-Work (PTW) & LOTO. Formal PTW for hot work, confined spaces, WAH, excavation, lifting near overhead lines, energization; LOTO for all isolation activities with verification and try-out. Issue PTW by authorized persons only; isolation lists & tags; periodic PTW audits; stop-work authority empowered.</p> <p>Lifting operations safety. Appointed lifting supervisor; certified crane/rigging gear; exclusion zones; wind limits; tandem/complex lifts with specific lift plans. Pre-lift meeting; equipment certification registry; real-time anemometers; lift permits for non-routine lifts.</p> <p>Traffic & mobile plant interface. Segregated pedestrian routes, one-way systems, speed limits, banksmen for reversing, proximity alarms/cameras, high-vis PPE. Yard Traffic Plan issued; weekly compliance walks; incident heat-map reviews; corrective actions implemented.</p> <p>Marine works safety. Safe access to barges/pontoons; PFDs mandatory near water; rescue equipment (life rings, ladders); man-overboard drills; weather/sea-state limits. Marine toolbox talks;</p>	

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			<p>permit for over-side work; standby boat during high-risk activities.</p> <p>Exposure controls (noise, dust, chemicals). Hierarchy of controls—engineering (enclosures, mufflers), administrative (rotation), and PPE (hearing protection, RPE). Chemical handling with SDS, ventilation, and spill kits. Baseline & periodic monitoring (noise dosimetry, dust, VOCs); health surveillance (audiometry, spirometry) per risk.</p> <p>Heat/cold stress & ergonomics. Work/rest cycles, shaded rest areas, hydration plans; winter clothing and de-icing plans; manual handling training and aids. Supervisors to implement environmental monitoring; record heat index actions; report strains and adjust tasks.</p> <p>Competence, training, and induction. Role-specific induction; verification of licenses (crane, forklift, MEWP); GBVH/Code of Conduct; emergency response training. Training matrix maintained by HR/HSE; refresher frequencies defined; no card/no work policy.</p> <p>Incident management & learning. Immediate reporting; root-cause analysis (ICAM); corrective/preventive actions; lessons-learned briefings. 24-hr reporting requirement; monthly incident review with management; trend analysis and targeted campaigns.</p> <p>Emergency preparedness. Site-specific ERP integrating fire, medical, chemical spill, severe weather, earthquake; drills (table-top + full-scale).</p>	
Construction Equipment Usage	Transition to operations adds forklifts, reach stackers, terminal tractors, RTGs and yard cranes. If traffic segregation and maintenance are weak, vehicle–pedestrian	High The risk is high because: • Consequence: High-energy equipment can cause	Develop a Traffic Management Plan for the Project and all Port activities. TMP must cover internal plant movements, interface with public roads, segregated pedestrian routes, one-way systems, speed limits, dedicated marshalling areas, banksmen rules for reversing, and night-work controls.	Low

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
	<p>interface and load handling incidents rise; nighttime operations add visibility/fatigue risks.</p>	<p>fatal or life-changing injuries.</p> <ul style="list-style-type: none"> • Likelihood: Continuous plant movements in constrained work fronts and mixed trades. • Exposure: Multiple contractors, varying competence, changing layouts, and marine–land interfaces. 	<p>Plant selection, certification & authorization. Use plant sized for task and ground conditions; lifting devices and accessories to be certified and within test date; operators licensed/authorized for specific equipment</p> <p>Preventive maintenance & pre-use checks. OEM-based preventive maintenance (brakes, steering, tires/tracks, hydraulics, slew bearings, hoists); daily pre-start checks documented by operators.</p> <p>Reversing & visibility controls. Fit reversing alarms, flashing beacons, cameras and proximity sensors on heavy equipment; mandatory banksman in congested zones; defined reversing bays.</p> <p>Ground conditions & stability. Assess bearing capacity/settlement for cranes and piling rigs; use matting/cribbing; define exclusion zones for swing radius and suspended loads.</p> <p>Lifting operations management. Appoint Lifting Supervisor; task-specific Lift Plans (incl. wind limits, tandem lifts, radius charts); certified rigging gear with unique IDs.</p> <p>Interface with utilities and marine works. Permit-to-dig for underground services; overhead line approach limits; for barges/pontoons: mooring integrity checks, access control, PFDs, rescue equipment.</p> <p>Night work & fatigue controls. Lux-level lighting plans for workfaces, glare control; hours-of-service limits and rest breaks; alcohol/drug testing; distraction (mobile phone) policy. Night-work permits; lighting inspections; tachograph/GPS audits; disciplinary actions for breaches.</p> <p>Pedestrian segregation & PPE. Barriers and marked walkways, designated crossings, no-go zones near swing areas; mandatory high-vis, safety footwear, helmets, eye/ear protection as task requires.</p>	

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			<p>Competency & supervision. Role-specific training (MEWP, forklift, crane), supervisor presence in high-risk areas, daily toolbox talks.</p>	
<p>Working Conditions</p>	<p>: Shift work and 24/7 operations may create fatigue and stress. Poorly maintained welfare facilities, limited grievance access, and weak HR implementation may result in low morale, high turnover, or labour disputes. GBVH and unequal treatment risks persist if policies are not enforced.</p>	<p>Medium Why Medium:</p> <ul style="list-style-type: none"> • Impacts affect worker well-being and productivity but are largely preventable through strong HR, OHS, and welfare controls. • Consequences (injuries, illness, social unrest) are moderate but can escalate if issues persist. • IFC PS2 and EBRD PR2 require compliance with ILO standards and Turkish Labour Law, making gaps significant for compliance. 	<p>Maintain and implement the existing HSE management system for the operational phase and expand it to incorporate the Project construction and operation. Extend HSE system to cover occupational exposure monitoring (noise, air, lighting, thermal comfort) and welfare audits. Contractor will implement workplace monitoring program pre-construction</p> <p>Working hours and overtime. Hours of work must comply with Turkish Labour Law (max 45 hrs/week, overtime capped, rest periods protected). Contractor HR to maintain time records; Autoport HR to audit monthly; publish anonymous summary to workers.</p> <p>Exposure controls. Baseline and periodic monitoring of noise, dust, illumination, and temperature; hierarchy of controls applied (engineering first, then administrative, then PPE). Accredited lab will conduct annual monitoring; results disclosed internally; corrective actions tracked.</p> <p>Equal opportunity and GBVH protection. HR policies must explicitly prohibit discrimination, harassment, and GBVH, with clear disciplinary measures. Autoport HR will issue updated policy; contractor induction includes GBVH awareness; grievance focal points trained.</p> <p>Worker voice and representation. Workers should be able to elect representatives; freedom of association respected. Autoport HR will facilitate elections; regular worker–management meetings; issues logged/resolved in follow-up tracker.</p>	<p>Low</p>

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			<p>Welfare and rest facilities. Adequate toilets, potable water, rest shelters, medical services, and catering facilities must be provided. Contractor will ensure facilities pre-mobilization;</p>	
<p>Climate Change</p>	<p>Expanded port infrastructure is exposed to climate-related hazards such as sea-level rise, storm surges, coastal flooding, and extreme winds. Climate variability can affect long-term port operations, asset resilience, and insurance costs. Inadequate adaptation planning may lead to structural damage, operational downtime, and stranded assets.</p>	<p>High The risk is high because:</p> <ul style="list-style-type: none"> • Ports are long-life assets; climate risks extend beyond project lifetime. • Exposure to sea-level rise and storm surges in the Marmara region makes infrastructure inherently vulnerable. • Consequences include operational disruption, damage to port assets, safety risks for workers, and long-term financial loss. 	<p>Review and update the existing 2024 Climate Change Risk Analysis (Iklim Degisikligi Risk Analzi) to include the planned expansion activities, in line with good international practice on adaptation such as EU guidance on climate proofing (e.g., Equator Principles CCRA Guidance). Assessment should include sea-level rise, storm surge, temperature extremes, precipitation changes, and wind patterns. Autoport will commission climate resilience consultant; report completed pre-construction; update every 5 years.</p> <p>Ensure that future port design incorporates acute and chronic climate change conditions. Design infrastructure for 1-in-100 year storm surge plus sea-level rise projections; reinforce quay walls, drainage, and breakwaters; ensure elevation of key assets. Autoport Engineering will integrate climate scenarios into design criteria; design reviewed by independent engineer; compliance confirmed prior to construction.</p> <p>Flood and stormwater resilience. Expand drainage capacity, retention basins, and pumping stations to handle extreme rainfall. Contractor will incorporate in CESMP; O&M to maintain pumps and drains quarterly.</p> <p>Heat and cold stress measures for workforce. Implement work-rest cycles, hydration programs, shaded shelters, warm clothing, and heating/cooling as appropriate. Contractor HSE will monitor heat index/cold stress daily; supervisors enforce breaks; records kept of interventions.</p> <p>Energy and emissions reduction. As the emissions will be small during operational greenhouse gas emissions through electrification of port equipment, energy-efficient lighting, renewable energy integration, and low-emission vehicles, the target will be to monitor</p>	<p>Negligible</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
			<p>the results Autoport O&M will mplement GHG inventory annually; publish reduction targets; report progress to EBRD/IFC.</p> <p>Emergency preparedness for extreme weather. Update ERP to include storm surge, flooding, extreme winds, and heat events. Conduct annual extreme-weather drills; lessons incorporated into ERP updates.</p>	
<p>Emergency Planning</p>	<p>Expanded terminal operations raise the probability and consequence of warehouse fires, hazardous material releases, vessel collisions/groundings at berth, crane failures, blackouts, cyber events impacting safety systems, earthquakes, and extreme-weather disruptions (storm surge, severe winds). Without an integrated, exercised Emergency Response Plan (ERP) and mutual-aid arrangements, consequences include fatalities, large environmental releases, business interruption, and reputational damage.</p>	<p>High The risk is high because:• Consequence: Potential for multi-fatality events and major environmental harm (Tier-2/3 spills, structural failures, conflagrations).• Exposure: Continuous construction + 24/7 operations; hazardous substances; marine + land interfaces; neighboring facilities and communities.• Dependency: Outcomes hinge on the quality of planning, training, equipment readiness, and inter-agency coordination.</p>	<p>Carry out worst-case scenario exercises, an annual exercise with top management with various [scenarios]. Run table-top and full-scale drills covering fire, major spill, mass-casualty, earthquake, and extreme weather; include muster/roll-call, ICS roles, communications, and post-incident recovery. HSE will publish an Annual Drill Calendar; at least 1 full-scale multi-agency drill/year; after-action reports with corrective actions tracked to closure in ESMS.</p> <p>Update the Emergency Response Plan (ERP) for the construction-operations phase interface, and for the port expansion project operations, considering the risks related to the nearby ports. Single, integrated ICS-based ERP (gold/silver/bronze) covering command structure, hazard-specific annexes (fire, spill, earthquake, storm surge, blackouts, cyber impacts on OT), notification trees, mutual-aid triggers, and business continuity.</p> <p>Port facilities are designed to comply with the Turkish Earthquake Regulation. Seismic design and post-quake inspection protocols for quay walls, cranes, warehouses, pipe racks; automatic shut-off for fuel systems; safe-shutdown procedures. Engineering have issued seismic design basis; commissioning includes seismic acceptance tests; O&M will train on post-event inspections and red-tag/green-tag criteria.</p> <p>Conduct a third-party fire and life audit especially for warehouses and take appropriate measures to equip the</p>	<p>Low</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
			<p>warehouses with adequate firefighting protection systems. Independent audit will be conducted for the operation phase to NFPA/EN standards; verify detection, alarm, sprinklers/foam, hydrants/monitors, fire water capacity, fire doors/partitioning, hazardous goods segregation, and egress.</p> <p>Marine spill preparedness (Tier-1/2 readiness). On-water spill kits (booms, skimmers, sorbents), shoreline protection plans, and agreements with OSR (Oil Spill Response) providers; drills with Coast Guard/Port Authority; once every six months boom-deployment drills; contracts with licensed responders; stocktake records.</p> <p>Alarm, communication & redundancy. Audible/visual alarms, VHF/DMR radios with dedicated emergency channel, PA systems, UPS/generator back-up for critical systems, and mass notification (SMS/app) to staff and neighbors.</p> <p>Training & competence. Role-based training for ICS leads, fire wardens, spill teams, first aiders, rescue boat operators; contractor onboarding includes ERP orientation. Maintain competence matrix; refresher intervals (e.g., first aid yearly, spill team semi-annual); no-card/no-role policy.</p> <p>Muster, egress & crowd safety. Marked muster points, headcount/roll-call procedures, accessible egress routes, lighting for night evacuations; arrangements for visitors and persons with reduced mobility.</p> <p>Documentation & improvement cycle. Central Emergency Preparedness Register (drills, equipment tests, impairments, training, MOUs, after-action items). Monthly KPI dashboard to E&S Steering Committee (drill completion %, close-out rate, equipment uptime).</p>	
Human Resource Policies &	Operational phase risks: As	High The risk is high because:	Develop a formal procedure for implementing the HR policy applicable to both employees and non-employee workers covering, at a minimum: relevant National Law, IFC PS2 and	Negligible

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
<p>Working Relationships</p>	<p>the workforce expands, ineffective HR management may cause systemic issues in working conditions, overtime practices, disciplinary procedures, and equal opportunity. Without consistent HR enforcement, risks include low morale, high turnover, labour unrest, and reputational harm with regulators and lenders.</p>	<ul style="list-style-type: none"> • Consequence: Direct impact on worker welfare, legal compliance, and investor confidence. • Likelihood: Multiple contractors and subcontractors with varying standards; high workforce turnover. • Dependency: Risks depend on effective HR policies, training, and grievance enforcement. 	<p>EBRD PR2 requirements. HR policy must include recruitment, equal opportunity, anti-discrimination, GBVH, grievance, discipline, overtime, wages, benefits, and termination procedures. Autoport HR to finalize HR procedure before mobilization; contractors required to adopt; annual HR audit to check compliance.</p> <p>Develop an onboarding package including written induction training for the expansion project and provide it to all new workers, contractors, subcontractors, and visitors. Onboarding must include Code of Conduct, GBVH policy, worker rights, safety obligations, grievance process, and community behavior expectations.</p> <p>Elect worker representatives who are freely elected by the workers in accordance with national laws. Workers must be able to elect representatives without management interference. Autoport HR will facilitate election process; ensure representatives attend monthly worker–management forums; maintain minutes/action logs.</p> <p>Establish a corporate approach/policy/procedure on working hours, overtime, remuneration, working hours recording and control, and overtime reporting. Align with Turkish Labour Law (max 45 hours/week) and ILO standards; require accurate digital tracking. Contractors will implement biometric or electronic attendance systems; Autoport HR will audit monthly; overtime trends reported to lenders.</p> <p>Assign HR staff with appropriate qualifications, experienced in labour compliance, empowered to manage and monitor labour issues including contractor/subcontractor compliance. Dedicated HR staff must cover recruitment, wages, accommodation, grievance, GBVH, and ILO compliance. Autoport will appoint Assistant HR manager; contractor HR staff vetted;</p>	

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
			<p>quarterly HR performance review meetings.</p> <p>Improve the worker Code of Conduct to be in line with EBRD PR2 and IFC PS2, describing expectations for behavior inside and outside the workplace, including GBVH provisions. Code must cover harassment, violence, community interaction, substance abuse, and environmental respect. Autoport HR will issue updated Code pre-mobilization; training for all workers; breach leads to disciplinary action up to termination.</p> <p>Contractor alignment. Require contractors to sign binding HR compliance agreements. HR audits extended to contractor camps/sites; non-compliance tied to payment milestones.</p> <p>Communication and awareness. Workers must receive policies in local language and through oral briefings for illiterate staff. Contractors will distribute handbooks and posters; Autoport HR to verify understanding via interviews.</p>	
<p>Wages, Benefits & Accommodation</p>	<p>Ongoing risks exist for direct and contracted workers if Autoport’s oversight is weak. Poor accommodation and inequitable wages/benefits reduce worker morale and productivity, and expose the company to non-compliance findings by regulators, lenders, and NGOs.</p>	<p>High The risk is high because:</p> <ul style="list-style-type: none"> • Consequence: Worker exploitation or poor accommodation can trigger strikes, legal penalties, and reputational harm. • Likelihood: High, given multiple subcontractors and temporary workforce. • Receptor sensitivity: IFC/EBRD clients and ILO conventions 	<p>Ensure daily working hours (regular + overtime), weekly working hours, and other aspects are in line with Turkish regulations and ILO standards. Hours limited to 45/week; overtime capped and compensated; mandatory weekly rest; holiday entitlements enforced.</p> <p>Overtime policies communicated and monitored by site management; ensure compliance of contractors. Written overtime policy shared in worker language; track overtime trends. Autoport HR will require reporting by contractors; trend analysis in quarterly HR review; corrective actions for repeat offenders.</p> <p>Wage and benefits compliance. Verify payrolls for minimum wage, social security, health insurance, and benefits in compliance with Turkish law. Contractor HR will submit payroll audits quarterly; Autoport HR will cross-check against legal minimums; wage slips provided to workers in local language.</p>	<p>Negligible</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
		<p>prioritize labour rights, making breaches highly visible.</p>	<p>Transparent payment systems. Require electronic wage transfers (not cash-in-hand) to prevent wage theft. Autoport HR will verify bank transfer records monthly; discrepancies escalated to E&S Steering Committee.</p> <p>Worker feedback and grievance. Workers must have accessible grievance channels for wage/accommodation issues, with option for anonymity. Contractors will provide complaint boxes in camps; Autoport HR to manage hotline; issues resolved within 14 days.</p> <p>Third-party inspections. Independent audits of accommodation and payroll systems to ensure compliance. Autoport will commission independent HR audits annually; findings shared with lenders/regulators only for the construction phase.</p>	
<p>Grievance Mechanism</p>	<p>If ongoing grievances (noise, emissions, traffic, safety, HR disputes) are not handled transparently, trust with stakeholders erodes, and Autoport risks sustained opposition, regulatory scrutiny, and potential financing non-compliance.</p>	<p>Medium Why Medium: • Consequence: Lack of grievance channels can create significant social tension and escalate to disruption. • Likelihood: High if not formalized, but risks can be substantially reduced with a strong system. • Visibility: Lenders (EBRD/IFC) and regulators require grievance mechanisms; gaps are highly scrutinized.</p>	<p>Develop a written grievance procedure describing how different communication channels work for handling grievances, including HR and management responsibilities. System must cover workers, contractors, subcontractors, and community stakeholders. Channels should allow anonymous reporting, be available in local language, and include clear escalation steps. Autoport HR/E&S team will prepare procedure; contractors will be required to adopt; procedure distributed via posters, inductions, and website.</p> <p>Grievance mechanism should allow anonymous complaints. Anonymous reporting options reduce fear of retaliation, especially for GBVH cases. Install complaint boxes at site and worker camps; set up dedicated hotline and email; assign neutral focal points.</p> <p>Implement specific reporting lines and documented grievance mechanism for discrimination and GBVH, using a survivor-centred approach. GBVH grievances require confidentiality, choice of reporting path, referral to support services, and protection from retaliation. Train GBVH focal points; establish referral pathways with NGOs/health services; ensure multiple options for complainants.</p>	<p>Negligible</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
			<p>Define a grievance channel for contractors and subcontractors in Autoport’s grievance procedure. Contractors’ workers must have equal access; their grievances tracked and resolved through Autoport’s central system. Contractors will designate grievance representatives; monthly log of grievances submitted to Autoport HR.</p> <p>Community grievance integration. Community grievances (traffic, dust, noise, fishing access) should feed into the same central system. CLO will record and track community complaints; quarterly disclosure of grievance trends and resolutions to stakeholders.</p> <p>Monitoring and learning. Regular review of grievance data to identify systemic issues and improve practices. Monthly review by Autoport HR/E&S; annual report to lenders including grievance statistics, resolution rates, and lessons learned.</p>	
<p>Subcontractor Management</p>	<p>Service subcontractors (e.g., security, waste, catering, trucking, maintenance) may continue poor practices, leading to labour disputes, unsafe conditions, or community tensions. Weak controls undermine Autoport’s ESMS, IFC PS2, and EBRD PR2 compliance.</p>	<p>High The risk is high because:</p> <ul style="list-style-type: none"> • Consequence: Subcontractor misconduct creates direct reputational, legal, and financial exposure for Autoport. • Likelihood: High due to reliance on multiple subcontractors for both construction and operation. • Visibility: Lenders, regulators, and NGOs 	<p>Enhance the existing Contractor Conformity Assessment and Working Instruction to ensure that the performance of contractors is managed and monitored according to the requirements of PR2. Assessment should cover HR, OHS, environmental management, and GBVH compliance. Autoport Procurement & HR will update assessment tool; apply pre-qualification for all subcontractors; quarterly monitoring audits.</p> <p>Contractual obligations. All subcontract agreements must include binding clauses requiring compliance with Turkish law, IFC PS2, EBRD PR2, and Autoport’s ESMS. Autoport Legal to standardize contracts; non-compliance triggers corrective action or contract termination.</p> <p>Pre-qualification and due diligence. Screen subcontractors for past compliance, certifications, and workforce practices before award.</p>	<p>Negligible</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
		<p>hold Autoport accountable for subcontractor actions.</p>	<p>Autoport Procurement to conduct due diligence; record results in supplier database; approval by E&S Manager.</p> <p>Training and induction. Subcontractor staff must receive induction covering OHS, HR, GBVH, grievance mechanisms, and community interaction. Autoport HR/HSE will run induction; attendance tracked; refresher courses every 6 months.</p> <p>Monitoring and inspections. Routine site inspections and performance reviews, covering HR compliance, accommodation, OHS, and environmental management. Autoport HR/E&S will conduct monthly audits; corrective actions logged and tracked; serious breaches escalated.</p> <p>Payment linked to compliance. Autoport will impose penalties in accordance with the Health, Safety, and Environment Penalty Procedure communicated to the Contractor. Issues identified on-site by the Autoport inspection team will be notified to the Contractor as penalties, which will be deducted from their end-of-month payment.</p> <p>Grievance accessibility. Subcontractor workers must have equal access to grievance mechanisms (HR, GBVH, anonymous channels). Contractors will be required to notify workers of channels; Autoport HR to track grievances monthly.</p> <p>Annual independent audits. Engage third-party auditors to verify subcontractor compliance with IFC/EBRD labour and E&S standards. Autoport to commission annual audits; results shared with lenders; corrective action plans monitored during construction phase.,</p>	
<p>Stakeholder Engagement & Information Disclosure</p>	<p>Operational phase risks: Without continuous engagement and disclosure,</p>	<p>High The risk is high because: • Consequence: Stakeholder</p>	<p>Prepare leaflets/brochures, a non-technical summary (NTS) of the Project (including grievance management and impacts on fishing, noise, traffic) in a user-friendly language and disclose in public areas. Use visuals, local language, and distribution via Mukhtar offices,</p>	<p>Negligible</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
	<p>Autoport risks ongoing community tension over traffic, emissions, and restricted fishing areas. Poor information sharing with NGOs, lenders, and regulators may lead to reputational harm, regulatory delays, or non-compliance with IFC/EBRD PR10 requirements.</p>	<p>opposition can delay or halt construction and create reputational risk with financiers.</p> <ul style="list-style-type: none"> • Likelihood: High, given existing sensitivities (traffic congestion, fishing restrictions). • Visibility: Lenders, regulators, and NGOs require proactive, documented engagement. 	<p>schools, fishermen associations, and municipal halls. Autoport CLO will update quarterly; verify distribution via stakeholder sign-off; provide online versions.</p> <p>Prepare and disclose SEP, NTS, and brochures on the website. SEP must include engagement strategy, frequency, and responsibilities for all stakeholder groups (residents, NGOs, regulators, lenders, businesses). Autoport E&S team to publish SEP pre-construction; update annually; progress shared in annual sustainability reports.</p> <p>Implement SEP and record a separate follow-up list for complaints received. Maintain a transparent complaints log, publicly reporting number, type, and resolution of grievances. CLO will update log monthly; summary shared with community and lenders quarterly.</p> <p>Ongoing engagement forums. Establish regular forums with PAPs (residents, fishermen, NGOs, neighboring industries). Topics include traffic mitigation, fishing impacts, safety updates, and monitoring results. CLO will hold forums every 6 months; minutes documented and shared; corrective actions tracked.</p> <p>Media and communication channels. Use local newspapers, radio, TV, and social media for wider project updates. Autoport Communications will issue monthly updates; monitor public feedback and address misinformation.</p> <p>NGO and regulator engagement. Regular briefings with NGOs, unions, and regulators on E&S performance. Autoport ESMS team will issue semi-annual performance briefings; disclose monitoring data (air, water, noise).</p> <p>Fisherfolk engagement.</p>	

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
			Maintain structured dialogue with fishermen associations CLO will hold meetings; outcomes documented; explore joint initiatives	
<p>Gender-Based Violence & Harassment (GBVH)</p>	<p>Without strong workplace culture and accountability, risks persist in daily operations (verbal/physical harassment, discrimination, abuse of power, retaliation). Weak HR oversight could lead to undetected GBVH cases, reputational damage, legal liability, and loss of lender support.</p>	<p>High The risk is high because:</p> <ul style="list-style-type: none"> • Consequence: GBVH incidents can cause trauma, unsafe workplaces, and severe reputational/financial harm. • Likelihood: Elevated in large, male-dominated infrastructure projects with multiple contractors. • Visibility: EBRD PR2 and IFC PS2 specifically require GBVH risk prevention and survivor-centered grievance processes. 	<p>Provide induction and periodic (annual) training to employees and contractors on GBVH, Code of Conduct provisions, and grievance mechanism procedures. Training should cover definitions, examples, reporting options, survivor rights, and disciplinary consequences. Autoport HR will integrate GBVH into induction; refresher annually; attendance logs maintained; toolbox talks addressing respectful workplace.</p> <p>Provide training to managers, HR, and focal points on how to respond to and investigate allegations of sexual harassment in the workplace and by/toward community members. Training should emphasize confidentiality, non-retaliation, survivor-centered approaches, and legal obligations. External GBVH specialists will conduct sessions; managers trained before mobilization; periodic refresher every 2 years.</p> <p>Strengthened Code of Conduct. Code must clearly prohibit all forms of GBVH, including off-duty conduct that impacts the community. Violations must result in clear disciplinary action. Autoport HR will issue updated Code in local language; contractors required to adopt; breaches tracked and disclosed to management/lenders.</p> <p>Survivor-centered grievance mechanism. Provide multiple, confidential, and anonymous reporting channels; ensure survivors control decision on escalation/referral. Train grievance focal points (incl. female representatives); establish referral pathways with health/legal/NGO services; CLO will coordinate external support.</p> <p>Community protection measures. Conduct awareness sessions in host communities to prevent harassment around port perimeters and worker accommodations. CLO will hold quarterly outreach with community;</p>	<p>Low</p>

Environmental and Social Topics	Potential Risk–Impact	Significance	Proposed Mitigation Measures	Residual Risk-Post Mitigation
			<p>Monitoring & reporting. Track GBVH grievances, outcomes, and lessons learned while maintaining survivor confidentiality. HR/ESMS team to submit quarterly GBVH performance summaries (number of trainings, grievances received/resolved) to E&S Steering Committee will disclose to lenders in annual reports.</p>	

6. Project Management, Delivery, and Environmental and Social Management Plan (ESMP)

Project Management and Delivery

The successful implementation of the Autoport Expansion Project requires a robust governance framework that integrates environmental and social (E&S) considerations into all stages of project delivery. To achieve this, the Proponent will strengthen its existing Environmental and Social Management System (ESMS), ensuring full alignment with national legislation, the IFC Performance Standards, the EBRD Performance Requirements, and relevant EU Directives.

A dedicated Environmental and Social Management Team will be established to supervise contractor performance, engage with stakeholders, and ensure effective monitoring and reporting. The ESMS will serve as the overarching framework, supported by thematic management plans that address project-specific risks. These plans will collectively form the Environmental and Social Management Plan (ESMP), a dynamic instrument updated as the project progresses from construction into operation.

Thematic Management Plans under the CESMP and ESMP

A Construction Environmental and Social Management Plan (CESMP) is a comprehensive site-specific plan that outlines how a construction project will manage and mitigate its environmental and social impacts during the construction phase. These plans are given below

Construction Phase

Management Plan	Brief Description
Camp Management Plan and Monitoring Program	This plan will govern the establishment, operation, and demobilisation of worker accommodation camps. It will include standards for sanitation, water supply, waste management, food safety, security, worker welfare, and regular inspections to ensure compliance with health, safety, and environmental requirements.
Dredging Management and Monitoring Plan (DMMP)	The DMMP will regulate dredging and reclamation activities. It will include procedures for sediment plume management, the use of silt curtains, disposal of dredged material at licensed facilities, and water quality monitoring for turbidity, hydrocarbons, and heavy metals.
Biodiversity Management Plan (BMP)	The BMP will guide the avoidance, minimisation, and offsetting of adverse impacts on marine and coastal ecosystems. It will cover seasonal restrictions on dredging and piling, turbidity monitoring and the implementation of biodiversity offsets
Climate Risk Management Plan	This plan will identify climate-related risks such as extreme weather, sea level rise, storm surges, and heat stress. It will define mitigation and adaptation measures to protect workers, infrastructure, and construction activities, and ensure project resilience throughout the construction phase.

Management Plan	Brief Description
Water and Wastewater management plan	This plan will regulate the sourcing, use, conservation, and discharge of water. It will include measures to prevent contamination of marine and groundwater resources, treatment of wastewater prior to discharge, and monitoring of water quality in accordance with regulatory standards.
Change Management Plan	This plan will establish procedures for identifying, reviewing, approving, and documenting changes to project scope, design, methods, or schedule. It will ensure that environmental, social, health, and safety risks associated with changes are properly assessed and managed.
Traffic Management Plan	This plan will manage vehicle and vessel movements associated with construction activities. It will include designated routes, scheduling, signage, driver training, and safety measures to minimise congestion, accidents, and disruption to local communities and port operations.
Community Health and Safety Management Plan	This plan will identify and manage risks posed by construction activities to nearby communities. It will include measures to control access to hazardous areas, manage construction traffic, reduce exposure to noise and dust, and promote community awareness and safety.
Noise and Vibration Management Plan	This plan will define measures to minimise noise and vibration impacts from construction equipment, construction and transport activities. It will include monitoring programs, equipment maintenance, scheduling controls, and mitigation measures to protect workers and nearby receptors.
Emergency Response Plan	This plan will establish procedures for responding to emergencies such as fires, spills, medical incidents, extreme weather, and accidents. It will define roles, communication protocols, evacuation procedures, coordination with authorities, and training and drills to ensure preparedness.
Waste management plan	This plan will govern the identification, segregation, handling, storage, transport, recycling, and disposal of all construction wastes. It will prioritise waste minimisation, reuse, and recycling, and ensure disposal at licensed facilities in compliance with regulatory requirements.
Surface runoff (stormwater) management plan	This plan will manage stormwater runoff to prevent erosion, sedimentation, and pollution of marine and terrestrial environments. It will include drainage controls, erosion control measures, and monitoring during rainfall events.
Air quality management plan	This plan will govern the minimization of air emissions such as dust, exhaust gases, and particulate matter from construction activities. It will include dust suppression measures, equipment maintenance, emission controls, and air quality monitoring.
Spill and Pollution Prevention Management Plan	This plan will establish procedures to prevent, contain, and respond to spills of fuel, oil, chemicals, and other pollutants. It will include

Management Plan	Brief Description
	storage standards, spill kits, staff training, inspection programs, and reporting requirements.
Occupational Health and Safety Management Plan	The OHS Plan will operationalise ISO 45001 requirements and cover risk assessments, permit-to-work systems, training, emergency preparedness, and alignment of contractor practices with international standards.
Hazardous Material Management Plan	This plan will regulate the safe handling, storage, transport, and disposal of hazardous materials used during construction. It will include inventory management, labelling, safety data sheets, worker training, and emergency response procedures.
Security Management Plan	This plan will ensure the safety and security of personnel, equipment, and facilities. It will include access controls, surveillance, coordination with port and local authorities, and measures aligned with international human rights and security standards.
Stakeholder Engagement Plan (SEP) and Grievance Mechanism	The SEP will set out structured engagement with residents, fishermen, NGOs, regulators, and other stakeholders. It will be complemented by a multi-channel grievance mechanism, including confidential and survivor-sensitive pathways for gender-based violence and harassment (GBVH) cases.

Operation Phase

The purpose of the ESMP is to consider and develop adequate measures and controls to minimize and mitigate the potential environmental and social risks and impacts identified during the project operation. The ESMP, as with the CESMP, will represent comprehensive site-specific plans for the operation phase that will include the following

Management Plan	Brief Description
Waste Management Plan	This plan will govern the identification, handling, segregation, storage, recycling, and disposal of operational wastes generated by port activities, including vessel waste, maintenance waste, and office waste. It will ensure compliance with MARPOL requirements, national regulations, and promote waste minimisation and recycling.
Surface runoff (stormwater) management plan	This plan will manage stormwater runoff from operational areas such as container yards, fuel storage areas, and maintenance zones. It will include drainage controls, pollution prevention measures, and monitoring to prevent contamination of marine and coastal waters.
Traffic Management Plan	This plan will regulate vessel, cargo handling equipment, and vehicle movements within the port. It will include designated traffic routes, signage, speed limits, scheduling, and coordination procedures to ensure safe and efficient port operations while minimising risks to workers and port users.

Management Plan	Brief Description
Occupational Health and Safety Management Plan	The OHS Plan will operationalise ISO 45001 requirements and cover risk assessments, permit-to-work systems, training, emergency preparedness, and alignment of contractor practices with international standards.
Noise and Vibration Management Plan	This plan will address noise and vibration generated from operational activities such as cargo handling, vessel movements, and equipment operation. It will include monitoring, maintenance of equipment, operational controls, and mitigation measures to protect workers and nearby communities.
Hazardous Material Management Plan	This plan will regulate the safe handling, storage, transport, and disposal of hazardous materials used during port operations. It will include inventory management, labelling, safe storage practices, safety data sheets, worker training, and emergency response procedures.
Community Health and Safety Management Plan	This plan will identify and manage risks to local communities arising from port operations, including traffic and emergency incidents. It will include access controls, safety awareness measures, coordination with local authorities, and procedures to minimise risks to the public.
Security Management Plan	This plan will ensure the safety and security of personnel, equipment, and facilities. It will include access controls, surveillance, coordination with port and local authorities, and measures aligned with international human rights and security standards.
Change Management Plan	This plan will define procedures for managing operational changes, including modifications to infrastructure, equipment, or operational procedures. It will ensure that environmental, social, health, safety, and security risks associated with changes are assessed and controlled before implementation.
Emergency Response Plan	This plan will establish procedures to responding to operational emergencies such as fires, spills, vessel collisions, medical incidents, and natural hazards. It will define roles, communication protocols, coordination with emergency services, and training and drills to ensure effective response.
Crisis Management Plan	This plan will provide a structured framework for managing major incidents that could significantly disrupt port operations or affect public safety, reputation, or the environment. It will include crisis communication procedures, leadership roles, business continuity coordination, and stakeholder notification protocols.
Stakeholder Engagement Plan (SEP) and Grievance Mechanism	This plan will define ongoing engagement with port users, workers, regulators, local communities, and other stakeholders during operations. It will include transparent communication processes and a formal grievance mechanism to receive, investigate, and resolve complaints in a timely and fair manner. The grievance mechanism will include confidential and survivor-sensitive pathways for gender-based violence and harassment (GBVH) cases.

Together, the CESMP, ESMP, and related plans will ensure that mitigation measures are not only designed but also effectively implemented, monitored, and adapted in line with international best practice.

7. Monitoring of Project Impacts and Mitigation

Purpose of Monitoring

Monitoring constitutes the essential feedback mechanism within the ESMP. It ensures that predicted impacts are validated, mitigation measures are effective, and corrective actions are initiated where necessary. Monitoring also underpins compliance with national legislation, lender requirements, and community expectations, while supporting adaptive management.

Monitoring Framework

The monitoring framework will cover both construction and operational phases, structured around key impact areas:

- **Air Quality:** Daily inspection of dust suppression, coupled with monitoring of PM₁₀, PM_{2.5}, NO_x, and SO₂ at site boundaries and haul roads.
- **Noise:** Weekly spot checks and continuous monitoring during piling to verify compliance with national and IFC thresholds. Sensitive receptors (residential and educational institutions) will be prioritised.
- **Water Quality:** monitoring of turbidity and hydrocarbons during dredging and reclamation. Marine surveys will assess heavy metals and suspended solids to protect aquatic ecosystems.
- **Traffic and Road Safety:** Daily logging of heavy vehicle movements, near-miss and accident recording, and monthly analysis of speed compliance and haul route safety.
- **Workers' Health and Safety:** Daily toolbox talks, weekly safety inspections, and monthly reporting of incident rates (TRIFR, LTIFR). Permit-to-work compliance will be tracked.
- **Community Health and Safety:** Continuous monitoring of grievances, accidents, and traffic-related community incidents. Monthly summaries will be reported to local authorities and communities.
- **Labour and Working Conditions:** Monthly payroll audits, accommodation inspections, and review of grievance mechanisms to verify compliance with Turkish law, ILO Conventions, and IFC/EBRD labour standards.
- **Climate Change and Resilience:** Annual inspections of drainage systems, coastal defences, and port structures, supplemented by post-event assessments following extreme weather.
- **Emergency Preparedness:** drills (fire, spill, earthquake, storm surge) and one annual multi-agency full-scale exercise. After-action reports will feed into ERP updates.
- **Stakeholder Engagement:** Continuous engagement tracking through the SEP, with quarterly reporting of meetings, grievances, and community satisfaction indicators.

Reporting and Adaptive Management

Monitoring data will be consolidated into:

- Monthly internal reports to the Autoport E&S Steering Committee.
- Quarterly reports to regulators, communities, and lenders.
- Annual sustainability reports following construction period including monitoring outcomes and corrective actions.

Where monitoring identifies exceedances or unanticipated impacts, the ESMS will trigger adaptive management through root-cause analysis, revision of mitigation measures, and enhanced stakeholder engagement.

Annex 1. Project Applicable requirements:

- The EBRD’s ESP (2019) (and the incorporated Performance Requirements (PRs)), and relevant European Union (EU) requirements (including, but not limited to, the EU EIA Directive and IE Directive)
- IFC Performance Standards on Environmental and Social Sustainability, Effective January 1, 2012, and associated guidance notes)
- The World Bank Group General Environmental, Health, and Safety (EHS) Guidelines, April 30, 2007; WBG sector specific EHS guidelines on Port, Harbor, and Terminal (2017)
- The Relevant international conventions and protocols relating to environmental and social issues, as transposed into national legislation, including, but not limited to
 - International Convention for the Control and Management of Ships’ Ballast Water and Sediments (2004);
 - International Management Code for International Ship and Port Facility Security (ISPS) Code, as an amendment to the International Safety of Life at Sea (SOLAS) Convention (1974/1988);
 - ILO core labour standards (Conventions C29 & 105, C87 & 98, C100 & 111, C138 & 182)
 - ILO Convention (C152) on Occupational Safety and Health (Dock Work), 1979;
 - ILO Code of Practice on Security in Ports (2004) and Code of Practice on Safety and Health in Ports (2005);
 - all ILO conventions covering the basic terms and conditions of employment;
 - International Convention for the Prevention of Pollution from Ships (MARPOL) (1973/1997) and Directive 2012/33/EU in regards to the sulfur content of marine fuel;
 - Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter (1972) and the Protocol to the Convention (1996);
 - International Convention on Oil Pollution Preparedness, Response and Co-operation (OPRC) (1990);
 - International Maritime Dangerous Goods (IMDG) Code (2016); and
 - Water Framework Directive (2000/60/EC).
 - Good Practice Guidance, including but not limited to:
 - Good Practice Handbook on Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets (2013);
 - Stakeholder Engagement: A Good Practice Handbook for Companies doing Business in Emerging Markets (2007);
 - Good Practice Note: Managing Contractors’ Environmental and Social Performance (2017);
 - Worker Accommodation: Processes and Standards. A Guidance Note by IFC and EBRD (2009);
 - IFC’s Use of Security Forces: Assessing and Managing Risks and Impacts;

- UN Voluntary Principles on Security and Human Rights;
- IFC Handbook for Preparing a Resettlement Action Plan,;
- Good Practice Note: Managing Risks Associated with Modern Slavery (2018); and
- Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector (2020).

The table below gives previously obtained permits, current status, and capacities for the Project area.

EIA Approval and Scope

Autoport Components: Working Areas and Capacities	09.07.2001 "No Significant Environmental Impact Decision for "Embankment and Jetty Facility"	28.07.2004 "EIA Not Required" Decision for "Zeyport Port Development Project"	26.04.2018 For the "Land Terminal for Storage Project" "EIA Regulation Out of Capacity" Opinion	Current Status	Current Project EIA Scope
Embankment Area	13.600 m ²	52.000 m ²	-	14.197 m ²	132.441 m ² (areas on the seaside of the coastal edge line: Area No. 1 26.036 m ² + Area No. 2 105.365 m ² + Area No. 6 1.040 m ²)
Area on Land	40.920 m ² (owned area on the seaward side of the coastal edge line)	75,000 m ² landfilling	89,627 m ² vehicle storage added to the existing facility area site and PDI facility on 2,400 m ² of this area	218.806 m ²	
Scaffolding	After filling, 138 m x 15 m in the northeast direction and 322 m x 15 m in the north direction. 25 m scaffolding structure was designed.	The 322 m x 25 m existing pier on the north side was envisaged to be extended by 100 m x 25 m, but only a tiny part was realized.	-	10.348 m ² pier area (138 m x 15 m access road and 328,5 m from outside, 325.6 m from the inside long, 25 meters wide scaffolding structure)	
Quay	-	A 120 m x 25 m east-west quay between the embankment and the pier, where ships can open hatches from the rear and rear right-side revision (not realized)	-	-	It is 163 m long, south of the existing pier, and has a 4,075 m ² (163 m x 25 m) new quay area.
Ro-Ro Ramp	-	-	-	-	1,859 m ² new Ro-Ro ramp southwest of the existing pier
Catwalk	-	-	-	-	25 m catwalk (50 m ²)
Dolfen	-	-	-	-	10 m x 10 m mooring dolphin (100 m ²)
Platform	-	-	-	-	Will be located behind the new 163-meter quay 12.118 m ² Platform (Area 3)
Fire Pump Station	-	-	-	25 m ² (on scaffolding)	Fire pump station platform (64 m ²),
Bottom Scanning	-	-	-	-	The depth of the area to be dredged varies between 0.32 m and 13 m. areas will be dredged to a maximum of -13.5 m. Dredging area~80,000 m ² excluding slope areas (~110,000 m ² including slope areas) (~487,000 m ³).

Autoport Components: Working Areas and Capacities	09.07.2001 "No Significant Environmental Impact Decision for "Embankment and Jetty Facility"	28.07.2004 "EIA Not Required" Decision for "Zeyport Port Development Project"	26.04.2018 For the "Land Terminal for Storage Project" "EIA Regulation Out of Capacity" Opinion	Current Status	Current Project EIA Scope
Loads and Handling Capacities	-800,000 tons/year Bulk Cargo (Corn, Soybean, Sunflower, Wheat, etc.) -200,000 tons/year Liquid Cargo -1000 pcs/year Container -500 units/year Vehicle	-	-	650,000 vehicles and 2,000,000 tons of general cargo handling	1,150,000 vehicles and 2,500,000 tons of general cargo handling capacity will be reached.
Annual Number of Vessels	50 pieces	-	-	Average 230 Ro-Ro and 200 general cargo vessels	On average, ship reception capacity is 250 on the Ro-Ro vessel side, around 300 on the general cargo ship side, and