

Environmental and Social Data Sheet

Overview

Project Name:	GAZIANTEP HEALTH CAMPUS
Project Number:	20130516
Country:	TURKEY
Project Description:	The design, construction, financing, equipment supply, provision of soft and hard facility management services and provision of some clinical support services for a part of an integrated healthcare campus in Gaziantep, under a 28-year Build Lease Operate and Transfer agreement with the Ministry of Health, Turkey.
EIA required:	yes (ESIA in accordance with EIB E&S standards will be available prior to the Finance Contract signature, and published on the Borrower's and EIB's websites)
Project included in Carbon Footprint Exercise:	no

Summary of Environmental and Social Assessment, including key issues and overall conclusion and recommendation

The Project will address the need for further healthcare development in Gaziantep Province, by expanding the healthcare services and reducing the existing hospital bed shortage through additional capacity of 1 875 beds. The health campus will include the following hospitals: General, Psychiatric, Oncology, Cardiovascular Diseases, Women's and Paediatric, Physical Medicine and Rehabilitation as well as a High- Security Forensics Psychiatric Hospital.

The Project does not fall within the scope of current Turkish EIA Regulation. Hospitals are not specifically mentioned in the EU EIA Directive 2011/92/EU; however, the project falls under the Annex II of the directive in relation to urban development, in which case the decision on whether an environmental impact assessment (EIA) is needed or not is up to the local competent authorities. The opinion of the local competent authority is being sought. Nevertheless, the SPV took the initiative to engage an international consultant to prepare an ESIA and an associated Environmental and Social Management Plan (ESMP) as required by international lenders' environmental and social standards. If the competent authority determines that the Project is subject to an EIA, a complementary EIA process following the national guidelines will be implemented. The project will be co-financed with the EBRD and it will also comply with the EBRD's Performance Requirements as well as the EIB Environmental and Social Standards.

To date, the Borrower is in the process of finalising the ESIA and ESMP and the EIB's due diligence was carried out on the basis of field visits and the consultant's comprehensive Scoping Report (released in May 2015). Prior to signature of the Finance Contract, the EIB will verify compliance of the final ESIA and ESMP with the EIB's environmental and social standards. An updated ESDS will be prepared to reflect the EIB final conclusions.

The Project is located in Şahinbey District of Gaziantep, southwest of Gaziantep city in southeast Turkey and covers an area of 32.5 hectares. The site was chosen because of the large scale urban development in the area. The Hospital will benefit from access road networks into central Gaziantep and around the city, proximity to the airport and the additional infrastructure that is planned as part of the new development.

Based on the information currently available to the EIB, the main adverse environmental impacts during construction will result from the permanent change in land use, construction activities and the operation of construction machinery and construction vehicles. The expected impacts during the operations include sanitary and contaminated wastewater, generation of domestic wastes and hazardous wastes, and increased road traffic. The main adverse social impacts and risks identified so far relate to a moderate influx of labour force,

impacts on livelihoods of persons temporarily occupying the site, patient and human rights, risks related to labour and working conditions, and the aspects of community security related to management of the high security forensic unit.

The EIB will condition the financing on: (i) delivery of the opinion of the competent authority on the application of the national EIA regulation (and if required by the competent authority, development of the EIA in accordance with the national procedures); (ii) the completion of the ESIA and ESMP, including a livelihood restoration plan (LRP), in compliance with the EIB's environmental and social standards; and (iii) delivery of documentary evidence issued by the Competent Administrative Authorities that all final construction and environmental permits have been granted.

The Project is expected to result in low to moderate adverse environmental and social impacts. Subject to the above mentioned conditions being met, the overall residual environmental and social impacts of the Project are expected to be acceptable.

Environmental and Social Assessment

Environmental Assessment

The Project does not fall within the scope of current national EIA Regulation; however the opinion of the competent authority is being sought. Where there are gaps between Turkish EIA legislation and international standards, the more stringent standards will be applied. Turkish EIA legislation does not require a social impact or cumulative impact assessments however these assessments will be undertaken in accordance with the Lenders' standards to fulfil this gap. Additionally, while not required for Turkish EIA legislation, international standards require stakeholder consultation with affected parties that is informed, meaningful and participatory. This approach will be applied for the ESIA.

Impacts on air quality during construction will likely include: (i) dust generated from earth movements and excavation, transport of construction materials and excavated soils, vehicle movement, and unpaved surfaces in the working area; and (ii) emissions from machinery and vehicles. Impacts during operation are likely to come from the increase in road traffic and emissions from the tri-generation plant that will be installed at the health campus.

Noise and vibration impacts during construction include excavation, crushing of existing rock on site, construction activities and the operation of construction machinery and construction vehicles. Impacts during operation will be related to increase in road traffic and operation of the tri-generation plant that will be installed at the health campus.

Biodiversity. The Project site supports modified habitats on the edge of a city, and is dominated by common and widespread species. During construction, a small area of semi-natural steppe habitat will be lost. No threatened or protected species were recorded, however globally vulnerable spur-thighed tortoise (*Testudo graeca*) is reported to occur on site. The effects of the Project on biodiversity will be limited to the project footprint, and appropriate mitigation measures will be included in the ESMP.

The potential impacts include impacts on the quality of the surface and groundwater environment during construction activities and operation activities. The ESIA will include identification of surface bodies in the Project area through desktop studies and site visits.

Sanitary wastewater will be generated by the workers during construction and by healthcare personnel and patients during operation. Contaminated wastewater may result from discharges from medical wards, laboratories, and pharmaceutical and chemical stores(). Adequate mitigation measures will be included in the ESMP.

There will be waste generation during construction that include excavated soils, solid, construction, and hazardous waste, which will require disposal. Waste generated during operation will include domestic wastes and hazardous wastes. As there will be no wastewater

treatment plant on site, there will be no sludge generation. The types and approximate quantities of wastes during construction and operation, waste storage options and the types of disposal facilities will be identified within the ESIA.

The Project will result in an increase in traffic on local roads surrounding the health campus during operation. The ESIA baseline studies will include identification of the traffic conditions near the Project area and in the wider region, traffic issues/problems in Gaziantep and planned developments to improve transportation systems in the city. A detailed Traffic Study that will include traffic counts and modelling for future scenarios is being prepared.

Cumulative impacts would arise from the impacts related to the residential area development that will occur in the vicinity of the Project site. These as well as the broader cumulative impacts of other ongoing health campus developments will be considered in the ESIA.

Social Assessment, where applicable

The Project site is on land belonging to the Treasury, which has granted rights to the Ministry of Health for the purposes of providing healthcare services. At least one business is known to have existed on the site prior to the land being leased to the Borrower. Social baseline studies undertaken as part of the ESIA will document the history of land use/tenure and how any resettlement was implemented. The ESIA studies will clearly identify any displacement that may have been induced by the Project, and identify corrective measures if needed.

Gaziantep has experienced highly significant influx of Syrian refugees. The official registered number is 350,000 while it is estimated that an additional 350,000 – 500,000 refugees may be residing in the Province but not registered. Refugees place additional pressure on the Gaziantep healthcare system and this is unlikely to change over the next five to ten years.

Syrian refugees are a significant vulnerable group. Access to public services such as schools and healthcare is only available once they have been officially registered. Although it appears that the majority of refugees have been absorbed into society, most rely on the support of Muhtars and landlords or healthcare centres to be registered.

Five Syrian refugees have been identified as using the site as a sorting point for their waste collection and recycling business. The Project is likely to impact on their livelihoods and this will be assessed further as part of the ESIA. They are also resident on the site, living in two tents and have been living there for three months. The Livelihood Restoration Plan as part of ESMP will identify the measures to ensure their relocation to safe adequate accommodation and maintain their livelihood.

The ESIA will also consider patient rights and human rights with respect to the operation of the hospital, including the rights of Syrian refugees. The ESIA will take into consideration international agreements on Human Rights and Justice as well as Turkish regulations. Although the Borrower commits not to use EIB funds for the forensic facility, patient rights will also be considered with respect to the Forensic Hospital, to ensure the principles of Human Rights and Justice are applied to the aspects of community security related to management of the forensic psychiatric hospital. This impact will also consider the tripartite agreement under management arrangements of the forensic psychiatric hospital by the Ministry of Health, Ministry of Interior, and Ministry of Justice.

There will be employment opportunities as a result of the Project. Significant staff recruitment is anticipated during the construction phase and further information is required on the number and skill level of people required, over what length of time and any existing plans about where workers would most likely be recruited from.

During its final due diligence prior to signature of the finance contract, the EIB will review the livelihood restoration plans for the affected refugees on the site, the estimated workers influx, the proposed traffic management measures, etc. The ESIA and the ESMP will detail the appropriate mitigation measures and a monitoring methodology, in line with international best

practice and the EIB's environmental and social standards. Provided that such mitigation and monitoring methodology will be carried out by the Borrower, the Project is expected to cause low to moderate adverse residual social impacts.

Public Consultation and Stakeholder Engagement, where required

As the Project does not fall within the scope of current EIA Regulation, stakeholder engagement is not mandatory under Turkish Law; however certain Project components (such as a tri-generation plant) may fall within EIA Regulation scope as Annex 2 Projects, which do require limited consultation. A number of stakeholders have been identified as part of an on-going ESIA process. These include relevant national and local authorities, local communities, NGOs and other stakeholders reflecting official community structures. A process of public consultation and disclosure is under way and will be continued during construction and operational stage. Additional public consultations will be conducted in Focus Group Discussions held as part of the social studies research for the ESIA.

A Stakeholder Engagement Plan (SEP) will be developed for the Project to ensure that all affected (directly or indirectly) and interested stakeholders are considered as part of the engagement process. Stakeholder engagement will be informed by a systematic, iterative process of stakeholder identification, analysis and mapping.

Other Environmental and Social Aspects

The involvement of multiple entities of the project's development and operation requires a clear delineation of responsibilities for implementation of the ESMP. As the developer and landlord of the health campus, the Borrower will assume ultimate responsibility for adherence to the Lenders' environmental and safety standards, as well as compliance with Turkish laws and regulations. Accordingly, the contractors and various authorities will be required to implement the provisions of the ESMP, but the Borrower would retain the authority to coordinate all required activities and take corrective action if any of those provisions have not been complied with.