

Environmental and Social Data Sheet Phase 2¹

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
Project included in Carbon Footprint Exercise:	no

Environmental and Social Assessment

If the Project had been located in the EU, it would have fallen under Annex II of the EU EIA Directive (2011/92/EU) in relation to urban development and the decision on the need for an EIA would have been up to the national Competent Authority. In line with the Turkish EIA Regulation, the opinion of the Competent Authority on the need for an EIA for the overall Project, and in particular for some of its components (like the concrete batching plant, tri-generation plant and boilers, helipad), has been sought and is pending. If the Competent Authority determines that one or more EIAs are required, the Project will be subject to the national EIA process as relevant.

In parallel and without prejudice to the national process, the promoter took the initiative, on a voluntary basis, to engage an international consultant to undertake an Environmental and Social Impact Assessment (ESIA) in line with international best practice and the EIB's and the other Lenders'² environmental and social standards. The resulting ESIA study, including the related Environmental and Social Management and Monitoring Plan (ESMMP) and Stakeholder Engagement Plan (SEP), are satisfactory to the Bank and have been disclosed on the promoter's and the EIB's websites. An Environmental and Social Action Plan (ESAP), addressing the gaps identified during the ESIA process, is under preparation and will be further disclosed upon signature of the finance contract.

¹ Gaziantep Health Campus followed a two-stage internal appraisal process. The Project's Environmental and Social Data Sheet (ESDS) from 21 July 2015 captured the EIB's preliminary environmental and social assessment at Phase 1. Following the completion of Phase 2, the current version presents the Bank's final E&S assessment.

² The Project is co-financed with the European Bank for Reconstruction and Development (EBRD) and Korea Eximbank (KEXIM).

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The ESAP will require the development, implementation and/or updating of a number of environmental and social management and monitoring plans, including an over-arching Environmental and Social Management System, Air Quality Management Plan, Workers' Camp Management Plan, Chance Finds Procedure, Construction Management Plan, Emergency Preparedness and Response Plan, Hazardous Materials Management Plan, Human Resources Policy, Noise and Vibration Management Plan, Occupational Health and Safety Management Plan, Security Policy and Management Plan, Traffic Management Plan and Waste Management Plan. The ESAP will also address contractor management, effluent control and treatment, and the environmental and social monitoring of the Project.

Environmental Assessment

The main environmental risk related to the Project arises from the significant increase in traffic during construction and in particular during operation. The Project is expected to have over 50,000 users daily during operation. Alongside the implementation of the Traffic Management Plan, safety awareness campaigns will be undertaken with local residents and the neighbouring school with a view of mitigating the public safety risk.

Another key issue during both construction and operation will be waste management. The Waste Management Plan will cover both hazardous and non-hazardous waste with provisions for waste minimisation, segregation, labelling, storage, transportation, recycling and disposal to meet national regulatory requirements and international standards.

Other environmental risks and potential impacts that have been addressed in the ESMMP and the ESAP include:

- Impacts on air quality during construction will be linked to: (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.
- 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.
- 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.
- Cumulative impacts will arise from the impacts related to the residential area development that will occur in the vicinity of the Project site.

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Social Assessment

The main social risks and impacts during construction and operation relate to the influx of labour force, labour and working conditions and the Project's security arrangements.

The project site, which covers a surface of 32.5 ha, is on land that was previously administered by the Treasury and whose ownership was passed on to the Ministry of Health (MoH) for the purpose of the Project. The site was leased to the promoter by MoH in September 2015 for a period of 28 years. The five Syrian refugees previously identified on site had left the project location prior to the start of excavation works through circumstances unconnected to the Project. The Livelihood Restoration Plan that was meant to address impacts on their livelihoods is no longer required.

There will be a significant influx of workers and hospital staff during construction and operation respectively. Specifically, during operation, the workforce is anticipated to be approximately 6,100, of which 3,600 will be healthcare professionals hired by the Ministry of Health and 2,500 operational and maintenance staff. The promoter will be responsible for recruiting all non-clinical staff and will implement a Human Resources Policy with clear guidance on contracting for both construction and operation. Contracts will further provide detail on workers' rights and a Workforce Code of Conduct will prescribe expected behaviour and govern interactions with the public. A Workers' Camp Management Plan will address housing modalities for the incoming workforce during construction.

Security personnel hired by the promoter during construction and operation will be required to act in line with the requirements captured in the Security Policy and Management Plan. Security arrangements during operation, particularly for the Forensic Hospital, will be coordinated, to the extent possible, with the Ministry of Home Affairs, the Ministry of Justice and Ministry of Health. Please see below for more detail on the operational modalities for the Forensic Psychiatric Hospital.

Public Consultation and Stakeholder Engagement

A Stakeholder Engagement Plan (SEP) was developed for the Project. To date, key stakeholders have been identified (relevant national and local authorities, local communities, NGOs and other stakeholders reflecting official community structures) and consulted as part of the ESIA process, including through Focus Group Discussions. The stakeholders' responses towards the Project have so far been largely positive. Stakeholders were made aware of the project grievance mechanism for any concerns they may have during construction and operation.

Stakeholder engagement will continue during construction and operation in line with the SEP and the requirements captured in the ESMMP and ESAP.

Other Environmental and Social Aspects

The involvement of multiple entities in the Project's construction and operation requires a clear delineation of responsibilities in the implementation of the ESMMP and the ESAP. As the developer and landlord of the Gaziantep Health Campus, the promoter will however have the ultimate responsibility to ensure compliance with EIB's environmental and social standards. To that effect and in line with the requirement of the ESAP, the promoter will develop an overarching Environmental and Social Management System (ESMS) and appoint a qualified Environmental and Social Manager to oversee its implementation throughout construction and operation.

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In the specific case of the Forensic Psychiatric Hospital (FPH), which is excluded from EIB's financing, during operation, the MoH will be responsible for the provision of medical care while the security and judicial arrangements will be under the responsibility of the Ministry of Home Affairs (MoHA) and the Ministry of Justice (MoJ) respectively. These arrangements are captured in a Protocol between the three Ministries from 2011, to which the promoter is not a party. MoHA and MoJ are further not part of the PPP structure. As a result, the extent to which the promoter will have the possibility to monitor and report on the operation of the FPH and ensure its compliance and alignment with EIB's environmental and social standards is limited.

Conclusions and Recommendations

In light of the above, the EIB will condition its financing on (i) the delivery of the documentary evidence issued by the Competent Authority that all relevant environmental permits have been granted (following the satisfactory completion of the national EIA process as required) and (ii) the undertaking by the promoter of the proper implementation of the various mitigation measures and plans captured in the ESMMP and the ESAP.

With these conditions in place, the project is considered acceptable for Bank investment in environmental and social terms.