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İşin Adı : Mersin-Adana-Osmaniye-Gaziantep Yüksek Standartlı Demiryolu Hattı
The Name of the Job : İnşaatı ile Elektromekanik Sistemlerinin Temini
Construction of Mersin-Adana-Osmaniye-Gaziantep High Standard Railway Line With Supply Of Electromechanical Systems

Rapor Adı : COMMUNITY HEALTH, SAFETY AND
Report Name : PHYSICAL SECURITY PLAN

Doküman Kodu :
Document Code : MAOG-RECU-GN-GNL-IS-GNL-PLG-0008-0

Revizyon Revision	Tarih Date	Rapor Adı : TOPLUM SAĞLIĞI, GÜVENLİK VE FİZİKİ GÜVENLİK Report Name : PLANI COMMUNITY HEALTH, SAFETY AND PHYSICAL SECURITY PLAN		
0	28/09/2021	Açıklama / Remarks :		
		Hazırlayan / Prepared by	Kontrol eden / Checked by	Onaylayan / Authorized by
		Onur GÜL İSG-Ç Şefi HSE Supervisor	Hasan TAŞKAN İSG-Ç Müdürü HSE Manager	Kayserşah ERDEM Proje Müdürü Project Manager
		Açıklama / Remarks :		
		Hazırlayan / Prepared by	Kontrol eden / Checked by	Onaylayan / Authorized by
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		Hazırlayan / Prepared by	Kontrol eden / Checked by	Onaylayan / Authorized by

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İŞ SAĞLIĞI GÜVENLİĞİ & ÇEVRE

1. PURPOSE

Purpose of the MAOG Community Health, Safety and Physical Security Plan is to:

- Identify applicable legislation and standards that may be relevant to this plan;
- Determine the roles and responsibilities;
- Determine the guidance process related to this plan;
- Identify the sources of impact and methods for prevention thereof; and
- Determine the grievance mechanism available to the disposal of the affected community.

2. SCOPE

MAOG Community Health, Safety and Physical Security Plan (TSGP) shall be implemented for management of the risks that may arise from the community health, occupational safety and security issues during the construction process of the project. TSGP identifies the mitigation measures to prevent or mitigate any undesirable risks on occupational safety and security that may affect the surrounding communities during project construction phase. In order to comply with the national legislation and international standard requirements, the main objectives of TSGP are as follows;

- Elimination or mitigation of adverse impacts on health, occupational safety and security that may arise from the MAOG project process,
- Establishment of a grievance mechanism in order to ensure effective communication between MAOG and the surrounding communities, to address the concerns of the affected community and to establish an effective communication,

3. LEGISLATION AND STANDARDS

The legislation and standards related to the project are as follows:

- Turkish occupational health and safety legislation and national standards currently in force,
- IFC Performance Standard 4: Community Health, Occupational Safety and Security,
- EBRD Performance Requirement 4: Community Health, Occupational Safety and Security,
- IFC General Environmental, Occupational Health and Safety Guidelines: 3.0 Community Health and Safety,
- EBRD Sectoral Environmental and Social Standards: Health Services and Medical Waste Disposal,



In Turkey, the health, occupational health and safety risks should be managed in accordance with the legislation set forth hereunder:

- Regulation on Protection of Buildings from Fire (Official Journal Date: 19.12.2007/26735)
- Highway Traffic Law (Official Journal Date: 18.10.1983/18195)
- Regulation on the Transport of Hazardous Substances by Road (Official Journal Date: 31.03.2007/26479)
- Waste Management Regulation (Official Journal Date: 02.04.2015/ 29314)
- Regulation on Assessment and Management of Air Quality (Official Journal Date: 06.06.2008/26898)
- Regulation on Assessment and Management of Environmental Noise (Official Journal: 07.03.2008/26809)

The international standards and guidelines related to the project include “IFC Performance Standards 4: Community Health, Occupational Safety and Security” and “EBRD Performance Requirement 4: Community Health, Occupational Safety and Security”. These standards set several recommendations regarding the community health, safety and security. MAOG shall comply with all such requirements during project construction phase. The essential requirements are as follows:

- The risks and impacts related to all affected communities shall be assessed during project construction phase.
- All risks and impacts arising from Project operations shall be assessed and the relevant communities shall be informed in culturally accurate manner.
- Infectious diseases that may arise from temporary or permanent workforce shall be minimized.
- Security service providers shall consider all risks both inside and outside the project. Engagement activities prior to construction will ensure that local stakeholders are informed of the risks and consequences of entering the site; Security personnel will patrol the site area to prevent any unauthorized access onto the site. They will also ensure that protocols for entering the construction site are enforced; The Grievance Mechanism for the Project will capture all grievances raised in relation to security and safety issues. These will be addressed promptly, and actions will be taken.



- All communities that may be affected shall be engaged to the process throughout the Project term and shall be informed on regular basis regarding realization of the plan and commitments.
- Endeavors shall be made to prevent occurrence of the incidents and accidents that may affect the communities.
- The occupational safety rules shall be implemented when transporting raw materials, hazardous or medical waste and the precautions shall be taken as necessary to prevent exposure of the public during these processes. The risk, exposure of the communities to such risk, the methods for prevention and monitoring thereof shall be submitted to the relevant authorities, and the competent authorities shall be prompted to monitor the process and the public shall be informed in this respect.
- Endeavors shall be made to prevent or mitigate all probable damages to air, soil, water, vegetation, fauna or other natural resources during the construction phase of the project.
- Preparations shall be in place at all times against emergencies and potential adverse situations in line with the project risks.
- Where necessary, emergency situations shall be responded effectively through cooperation with the community and local legal authorities.
- In the event where the response of the security personnel to any situation is contemplated to be illegal or exceeding authority thereof, measures shall be taken to prevent recurrence of any such incident, this situation shall be duly reported and local authorities shall be informed if appropriate.
- IFC General Environmental, Health and Occupational Safety Guidelines involve the aspects of community, environment, health and occupational safety. These guidelines relate to the following items:
 - Quality of, and access to, the water - Preventing adverse impacts that could affect the quality of, or access to, the ground and surface water resources and protecting the private or public drinking water supplies
 - Identifying the opportunities for mitigating potential hazards to the public during project construction phase and for reducing the likelihood of incidents or accidents.
 - Fire safety - Executing the project construction phase by complying with the nationally recognized fire standards, legal/insurance requirements and fire legislation. Fire detection



and alarm systems, the evacuation system and the emergency plan represent the vital aspects of the fire safety.

- Traffic safety - Preventing traffic accidents and ensuring traffic safety for all Project personnel
- Transport of hazardous substances - Establishing procedures through compliance with the local and national requirements regarding the transport of hazardous chemicals, and preventing or mitigating the risk of major accidents related to hazardous chemicals.
- Disease prevention - Periodic examinations, vaccinations and treatment of laborers, execution of awareness rising and education campaigns on health for the local communities
- Emergency and response - Preparation of the contingency and response plans related to the project through involvement of the communication systems, public information, media relations and the Ministry of Health process

4. ABBREVIATIONS

TSGP : Community Health, Safety and Physical Security Plan

Project : Mersin Gaziantep High-Speed Train Project (MAOG)

IFC : International Finance Corporation

EBRD : European Bank for Reconstruction and Development

5. ROLES AND RESPONSIBILITIES

Project Manager

- Overall responsibility for development, review, approval and coordination of several activities required for execution and completion of the project construction processes.
- Ensuring that this plan is drawn up according to the activities and operations undertaken by MAOG as part thereof, and is updated as required.
- Ensuring that adequate resources are made available for implementation of the procedures and guidelines as outlined in this plan.

HSE Manager

- Implementation and coordination of this plan during construction phase
- Implementing appropriate control procedures and performing necessary audits
- Delivering necessary training to the personnel of MAOG, REC and the subREC, implementing relevant procedures and essential requirements

CLO (Chief Liaison Officer) - Production Manager



Proper implementation of the grievance mechanism

MAOG Human Resources Supervisor

- Implements the workplace policies, procedures and management plans, recruitment processes, skills development, training and awareness raising and staff reduction activities.
- Ensures that the policies and procedures contain the national labor law and international standards, such as the International Labor Organization, international standards such as IFC PS2/EBRD PR2 on Labor and Working Conditions and the World Bank Group Environmental, Health and Safety Guidelines.
- Policy practices shall involve direct, contractual and supply chain employees, and cover aspects such as the human rights, non-discrimination, equal opportunity, protection of vulnerable people, skills development, grievance management, health and safety, forced labor and child labor.

Transparent and non-discriminatory grievance procedure is implemented regarding the workplace management.

Headquarter E&S Manager:

Responsible for managing infrastructure and superstructure projects regarding environmental and social governance issues and member of the Executive E&S Committee on behalf of the REC.

SubREC and Laborers

- Understands and acts in line with the human resources procedures and guidelines as outlined in this plan.

5.1 PIU (Project Implementation Unit)

- **PIU Physics Engineer** who is responsible for supervising health and safety for the Project.
- **PIU Department Manager (Superstructure / Civil Engineer)** will be responsible for overseeing the implementation of all health, safety and social measures, as specified within the disclosure package of the Project, and regular reporting to AYGM PIU.

5.2 Executive Environmental and Social Management Committee

- **Executive E&S Committee Project Manager (Department Head / Branch Manager /Head of Department)** will be ultimately responsible for overseeing the activities undertaken by the AYGM/TCDD specialists (listed below), overseeing the implementation of mitigation measures and management procedures specified within the disclosure package of the Project, and overseeing the preparation and implementation of a CESMP, which will be based on this ESMP.
- **Executive E&S Committee Environmental, Health and Safety, and Social (EHSS) Manager (Specialist / Engineer)** will be responsible for overseeing all matters that relate to environment, health, safety and social aspects of the Project. Also, s/he will be appointed to be responsible for supporting the implementation of the SEP, by



conducting regular consultation with affected communities on any concern regarding the Project. CLOs will also have responsibility for disseminating the Project disclosure package as described in the SEP. They will also conduct regular inspections of records relating to grievances received and their resolution. S/He will report regularly to AYGM PIU.

Further technical staff may be required during the course of the Project, who will be assigned internally by the AYGM, either by means of permanent or temporary basis until the completion of relevant tasks under the Project whilst they undertake their current responsibilities

6.ACTIVITY FLOW

Mitigation Measures for Disturbance Environmental Health, Quality of Life and Wellbeing During Construction Phase:

- Health, Safety and Security Plan (including occupational health and safety (OHS)), will include awareness of community health and safety issues. The Health, Safety and Security Plan (including occupational health and safety (OHS)), which includes the measures to be taken regarding the pandemic, will be implemented according to the current situation regarding Covid-19
- Construction work schedule will be distributed to the affected settlements in a timely manner to inform any road closures and construction related cautions.
- Air and noise monitoring will be undertaken in accordance with local regulations. Establish in advance a relationship with municipal environmental department.
- Operational area in access roads, work sites, construction camp sites, batch plant and etc. will be regularly monitored for air quality parameters such as PM10, PM2.5, SO2, GHG Emissions etc.
- Construction work schedule will be distributed to the affected settlements in a timely manner to inform any road closures and construction related cautions.
- Dust suppression mitigation measures such water sprinkling will be implemented in sensitive locations.
- Operational areas in in borrow areas, access roads, work sites, construction camp sites, batch and etc. will be regularly monitored for noise levels representing all hours of a typical work shift.
- In case of noise exceedance, silencers or acoustic enclosures on machines as well as portable sound barriers around stationary equipment, should be installed where applicable.
- Movement of construction traffic through sensitive receptor community areas will be prevented or limited, wherever possible. If this cannot be avoided, additional measures defined in the Traffic Management Plan (TMP) such as slower driving rules, physical speed restrictions) will be applied.
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- Sensitive receptors (e.g. hospitals, nursing homes, schools) will be provided with advanced notification of noisy works and project specific additional mitigation measures.
- Special acoustic insulation and related mitigation measures will be evaluated on a case-by-case basis.
- 20kph speed limit will be applied on unpaved surfaces close to settlements.
- Wind breaks or dust protection systems (including sprinklers) should be built around the main construction activities where necessary and, if possible, near potentially dusty works to minimize the impact of nearby residential receptors.
- During transportation on public roads, the excavated materials will be covered with nylon canvas or suitable materials with a grain size greater than 10 mm in public roads as good practice.
- To reduce fugitive dust emission during vehicle operation on public roads and at construction sites, service roads and quarry/material storage
- Dust suppression methods (i.e. watering with water trucks, applying nontoxic chemicals, speed limits for mobile vehicles, using well-maintained vehicles/equipment) should be used.

In case of a Grievance, additional measurements will be implemented, and the results will be shared with the complainant. If the results of the measurements will not fit with the commitments given in the relevant environmental Chapters of the report, additional mitigation measures will be implemented.

International standards and guidelines to be applied for the project include; “IFC Performance Standards 4: Community Health, Safety and Security”. These standards contain a set of recommendations regarding public health, safety and security. REC will comply with these requirements when implementing the project. Key requirements include:

- Assessment of risks and impacts on affected communities at all project phases;
- Project construction will be in accordance with good international practice, and special attention will be given to the potential risk of exposure to natural hazards where access to, or failure of, structural elements by all members of the affected community would result in direct or indirect injury to the community;
- Risks and impacts arising from project activities will be assessed and reported in a culturally appropriate manner. Emergency community situations will also be addressed;
- Permanent and temporary labor and the transmission of communicable diseases will be minimized;
- Risks inside and outside the construction site will also be addressed where workers and RECs remain to ensure safety;
- Affected communities and organizations will be in constant contact and briefed on the implementation and outcomes of the plans and commitments, and any material changes to the plans will be discussed before such changes are made;



- The occurrence of incidents and accidents related to the operation of vehicles on state highways will be tried to be prevented;
- Commercially reasonable efforts will be made to control the transportation safety of raw materials and to handle and dispose of waste materials, and measures will be implemented to prevent or control community exposure. Information on risk, exposure of the population to incidents, mitigation measures and monitoring opportunities will be provided to relevant organizations and will be in constant contact with the community;
- Negative impacts from project activities on air, soil, water, vegetation and fauna and other natural resources used by affected communities will be eliminated or minimized;
- Be prepared to respond to incidents that may result in accidents and emergencies, in a manner appropriate to operational risks and preventing their potential negative consequences;
- Assist and cooperate with community and local government agencies in effective response preparations, particularly where participation and cooperation are required in the aforementioned emergencies;
- Illegal violations by security personnel will be investigated, action will be taken to prevent recurrence (ensure appropriate parties take action), illegal and violating behavior will be reported to public authorities where appropriate.
- Water quality and availability – avoiding adverse effects on the quality and usability of ground and surface waters and surface water resources, and protecting drinking water resources at all times, whether public or private;
- Structural safety of the project infrastructure – performing hazard analysis when assessing project activities to identify potential opportunities to mitigate potential public hazards and mitigate failure or accident consequences;
- Life and fire safety – Design, construction and operation of all new buildings open to the public in accordance with building codes, fire regulations, legal/insurance requirements and the internationally recognized Standard for Life and Fire Safety. Fire prevention, escape routes (design of measures to facilitate safe evacuation in an emergency), detection and alarm systems, and emergency action plan are important elements of life and fire safety provisions;
- Traffic safety – preventing traffic accidents and improving traffic safety with all Project personnel.
- Transport of dangerous goods – establishing procedures to ensure compliance with local laws and international requirements relating to the transport of dangerous goods, as well as to prevent or minimize the consequences of catastrophic release of dangerous goods into the environment;



- Disease prevention – prevention of the occurrence and spread of community disease, including discovery, active monitoring and treatment of workers, health awareness and awareness raising and education initiatives in local communities, and the provision of health services; and
- Emergency preparedness and response – Preparation of Emergency Preparedness and Action plans commensurate with facility risks, including provision of communications systems, public information, media and agency relations, medical services, etc.

7. MONITORING, ASSURANCE AND VERIFICATION

Key success indicators (KPIs) of this procedure will be monitored, verified and evaluated by the relevant parties in accordance with their responsibilities set forth in the E&S Governance document, within the scope of the MAOG-RECU-GB-GNL-IS-PRG-0007-0 HSE Monitoring, Assurance and Verification Procedure.

8. RELATED DOCUMENTS

HSE Plan



İŞ SAĞLIĞI GÜVENLİĞİ & ÇEVRE