



Karapinar YEKA Solar Power Plant

Human Rights Scoping Report

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1 Introduction

Kalyon Enerji Yatırımları A.Ş. (the Project Company) plans to develop and operate the Karapınar YEKA Solar Power Plant Project (the Project) with a total installed capacity of approximately 1.3GWDC/ 1GWAC, on a land area of 19.2 km² to the northeast of the town of Karapınar, Konya Province in Turkey. Construction will be completed in two phases over a three-year period. Construction and installation works of the Project's Phase-1 commenced at the end of June 2020 and are planned for completion in March 2021. Construction and installation works of Phase-2 are planned to commence in March 2021, with the completed solar power plant to be fully operational by August 2023.

In July 2020, the first draft of the Project's Environmental and Social Impact Assessment (ESIA) was developed by RINA Consulting. Mott MacDonald, the Lenders' Technical Advisor (LTA) for the Project, produced a draft Environmental and Social Due Diligence (ESDD) report in November 2020 based on a review of the ESIA and related documentation. As part of this ESDD review, the need to conduct a screening of the Project's human rights impacts was identified, in order to bring the Project into compliance with Equator Principles IV, specifically the following clause:

“The client is expected to include assessments of potential adverse Human Rights impacts [...] as part of the ESIA or other Assessment, with these included in the Assessment Documentation.”

In response to this requirement, this document has been produced as the high-level scoping report to determine the nature and extent of the Project's potential human rights impacts and risks. If this study identifies potential high human rights risks associated with the Project, a full human rights impact assessment (HRIA) will be conducted to get a fuller understanding of the human rights risks and appropriate ways to mitigate them.

2 Reference Framework

This report has been prepared in consideration of the below international standards and guidelines and national legislations.

International Framework

- Equator Principles' Guidance Note on Implementation of Human Rights Assessments (2020)
- United Nations Guiding Principles on Business and Human Rights (UNGPs) (2011)
- Universal Declaration of Human Rights (1948)
- International Labour Organisation's Declaration on Fundamental Principles and Rights at Work (1998)
- International Covenant on Economic, Social and Cultural Rights (ICESCR) (1966)
- International Labour Organisation's Fundamental Conventions:
 - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)
 - Right to Organise and Collective Bargaining Convention, 1949 (No. 98)
 - Forced Labour Convention, 1930 (No. 29) (and its 2014 Protocol)
 - Abolition of Forced Labour Convention, 1957 (No. 105)
 - Minimum Age Convention, 1973 (No. 138)
 - Worst Forms of Child Labour Convention, 1999 (No. 182)
 - Equal Remuneration Convention, 1951 (No. 100)
 - Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
- Convention on the Rights of the Child (1989)

National Framework

The following national legislation relating to protection of human rights have been applied for this scoping exercise:

- Constitution of the Republic of Turkey Act No. 2709, 1982 (last amended in 2011)
- Labour Law No. 4857, 2003 (last amended through law No. 6645 in 2015)
- Labour legislation including:
 - Labour Act No. 1475, 1971
 - Occupational Health and Safety Law No. 6331, 2012
 - Social Insurance and Universal Health Insurance Law No. 5510, 2006
 - Regulation on Overtime and Extra Hours No. 25425, 2004
 - Regulation on the Principles and Procedures Governing the Employment of Children and Young Workers published in gazette No. 25425 (April 2004)
 - Law on Trade Unions and Collective Bargaining Agreements No. 6356, 2012

3 Methodology

A desktop scoping study has been conducted to determine the levels of human rights risks and potential mitigation measures that are pertinent for the Project.

In order to assess the Project-specific human rights context and determine the level of risk for each human rights, the scoping exercise takes into account the mitigation measures proposed within the Project's 2020 ESIA, as the corrective actions identified by the LTA as part of the Environmental and Social Action Plan (ESAP) in the 2020 ESDD report.

Actual and potential adverse human rights impact as a result of the Project will be examined as part of this study, taking into consideration:

- **Civil and political rights:** Right to life, liberty, security, protection from torture and inhumane or cruel treatment and punishment, right to equality, non-discrimination, access to effective remedies, privacy, freedom of movement, property ownership and freedom of expression
- **Labour rights:** Rights regarding just and favourable conditions of work, freedom of association, modern slavery, child labour, safe and healthy working conditions, and social security
- **Economic, social and cultural rights:** Right to adequate standard of living and housing, health, food, water, sanitation and participate in the cultural life of the community
- **Rights of vulnerable groups:** Rights of children, people with disabilities, migrants, refugees, women and ethnic and religious minorities

4 Identification of Human Rights Risks

Table 1 identifies the classifications to be applied for each human rights risk identified.

Table 1: Human rights risk classification

Human rights risks identified	Definition
Low	Potential risks are in place for workers and external stakeholders in general, but can be mitigated through the Project Company's ESMS
Medium	Potential risks are in place including for vulnerable populations, but can be mitigated through the Project Company's ESMS
High	Violation of human rights is taking place currently in the Project area of influence (Aol) by the Project Company or other parties

Table 2 below shows the results of the human rights screening conducted for the Project.

Table 2: Human rights screening

#	Human rights	Project context	Risk assessment
Civil and political rights			
1	Right to life, liberty and security	<p>Security</p> <p>Human rights abuses conducted by public security forces have been reported in Turkey, particularly in the aftermath of the attempted coup in 2016. They have primarily targeted political dissenters, protestors and human rights advocates in south-eastern Turkey where significant Kurdish populations reside and metropolitan areas such as Istanbul and Ankara. The south-western central region where the Project is located has not experienced a similar level of widespread human rights violations by security forces. The Project Aol in particular is a relatively sparsely populated area, with the nearest residential building from the Project site located 2.3km, the town of Karapinar 4.5km away, and the largest city in the Province of Konya (Konya city) situated 95km away.</p> <p>While protests have occurred in the town centre, major incidents of violence by public security forces have not been reported in recent years. The Project Company has confirmed that there have been no security events or significant unrest noted within the last year in the Project's Aol.</p>	<p>Low</p> <p>The Project's Aol is generally located at a distance from major political unrest and significant Kurdish populations that are targeted by the government, while there will be no public security forces and armed personnel on the Project site.</p> <p>Appropriate mitigation measures have also been established to manage the private security personnel's behaviour as part of the ESIA. Once implemented, the risk to right to life and security will be appropriately addressed.</p>

#	Human rights	Project context	Risk assessment
		The Project will employ a private security company, with the ESIA identifying measures to maintain and oversee the behaviour of security personnel such as the development of a security personnel code of conduct and mandatory training on human rights and cultural sensitivity. All Project security personnel will be unarmed.	
2	Right not to be subjected to torture, cruel, inhuman and/or degrading treatment or punishment	<p>Allegations of excessive use of force by public security forces and allegations of torture and ill-treatment in police detention have been reported in Turkey following the attempted coup in 2016, which the government has denied.</p> <p>The Project's Security Management Plan (SMP) has been developed with an emphasis on respecting and protecting human rights, and de-escalation of conflicts.</p>	<p>Low</p> <p>Project-specific mitigation measures are in place with an emphasis on protection of human rights in the SMP, and there will be no public security forces present on the Project site.</p>
3	Right to equality before the law, equal protection of the law and non-discrimination	<p>Turkey has ratified both ILO Conventions 111 and 100 on discrimination and equal remuneration. The national Labour Law (2003) and the Constitution (1982) prohibit discrimination on the basis of language, race, sex, political opinion, philosophical belief, religion and sect, and different remunerations for work of equal value. Harassment in general and sexual harassment are also prohibited under the Labour Law, however sexual harassment against women continues to be prevalent in Turkey.</p> <p>Non-discrimination clauses are included in the Project's Labour Commitment Policy (LCP) and the LTA has recommended that this commitment be implemented through awareness training on gender equality for workers and facilitation of gender-neutral facilities on site. Harassment is not explicitly mentioned in the LCP.</p> <p>For private companies with more than 50 workers, Turkish law requires that at least 3% of the workforce consist of persons with disabilities. The Project's human resources documentation do not appear to include explicit references to non-discrimination and equal protection of people with disabilities, or how it aims to meet this legal requirement.</p>	<p>Medium</p> <p>Risks to rights to equality and non-discrimination will be appropriately addressed through implementation of the relevant ESAP actions, as well as additional mitigation measures including training and zero tolerance policy on harassment, explicit clauses on equal protection and treatment of people with disabilities and development of a procedure detailing how the Project Company will aim to meet the 3% target for recruitment of persons with disabilities.</p>
4	Right to access to effective remedies	Community and workers' grievance mechanisms have been developed as part of the Project's ESMS, enabling any party to submit grievances and concerns to the Project without retribution in a timely manner.	<p>Low</p> <p>Mechanisms are in place to receive and resolve internal and external grievances, in line with IFC PS1 and PS2 requirements.</p>

#	Human rights	Project context	Risk assessment
5	Right to privacy	<p>Article 20 of Turkey's Constitution protects the right to privacy and the right to data protection. Personal data can be processed only in cases required by law or by the person's explicit consent.</p> <p>The Project's relevant documentation including corporate E&S policies, grievance mechanisms and labour management plan do not include explicit references to personal data privacy and protection. Given the nature of the Project, the provision of sensitive personal data held by the Project to the State without consent is considered low.</p>	<p>Low</p> <p>Commitments to data protection and privacy and mechanisms to secure digital and physical data will be added to existing management plans. Once implemented, the risk to right to privacy will be appropriately addressed.</p>
6	Right to freedom of movement	<p>Workers will be housed in Project site accommodation during the construction phase. There are no restrictions on their movements when they are off duty. The Project does not retain any workers' passports.</p> <p>Fifteen local herder households who use the Project area for livestock grazing purposes will experience an increased journey time to reach the pasture due to the Project activities, however they will be able to continue to access the Project site's pastureland through alternative routes.</p>	<p>Low</p> <p>Workers, including those residing in on-site accommodation, have full freedom of movement. Local herders continue to be able to access the Project site's pastureland through alternative routes.</p>
7	Right to own property	<p>The Project area consists of public land, with pasture areas being used for grazing purposes by local community members. No land expropriation, purchase or lease has been required and no residents' right to own property (either formal or informal) has been or will be affected.</p>	<p>Low</p> <p>No physical displacement will take place for the Project.</p>
8	Right to freedom of opinion, information and expression	<p>In Turkey, the post-coup period has continued to see many freedoms of expression curtailed. This included arbitrary closure of media outlets, arrests of journalists and academics and internet censorship, targeting criticisms of the state or government.</p> <p>Within the context of the Project, the grievance mechanisms in place enable stakeholders to exercise their right to freedom of opinion and expression by submitting grievances related to the Project.</p>	<p>Low</p> <p>Additional commitments will be added to the grievance mechanisms to make the Project's commitment to confidentiality, anonymity and protection from retribution more explicit.</p> <p>A commitment to non-judgment of workers' political and religious views in employment considerations including recruitment, promotion and dismissals will be added to the LCP.</p>
Labour rights			
9	Right to work	<p>Turkish law requires provision of worker contracts for all contracts exceeding one month, and probation and notice periods to be in place.</p>	<p>Low</p>

#	Human rights	Project context	Risk assessment
		The Project's Labour Commitment Policy (LCP) includes the Project Company's commitment to not undertake unfair or arbitrary dismissal of workers. The Labour Management Plan (LMP) is to elaborate commitments on terms of employment as listed in the Policy.	The appropriate mitigation measure has been identified in the ESAP. Once implemented, the risk will be appropriately addressed.
10	Right to enjoy just and favourable conditions of work	Turkey's labour laws establish requirements relating to compensation, minimum wages, leave, rest breaks, social security and contracts. The Project Company's LCP commits to project compliance with all national requirements, ILO Conventions ratified by Turkey and IFC PS2, applying to both direct and contractor workers. As per the findings of the ESDD, this policy has not yet been fully adopted and disclosed to all workers.	Low The appropriate mitigation measure has been identified in the ESAP to formally adopt and disclose the LCP to the workforce. Once implemented, the risk will be appropriately addressed.
11	Right to form and join trade unions and the right to strike	Turkish law provides for freedom of association and trade membership, with anti-union discrimination prohibited. ¹ However, the government is able to deny the right to strike in any situation that is deemed to be a threat to public health or national security, although this appears to be aligned with the ICESCR which indicates that States can restrict this right in circumstances that are "set down in law and are necessary to protect national security [or] public order". Cases of antiunion discrimination have also been reported by worker organisations. While the Project does not currently have a union or collective bargaining agreement, freedom of association and collective bargaining are defined in the Project's LCP. It states that the Project Company respects the workers' right to establish and join organizations without authorization and workers shall not be subjected to union discrimination. While right to strike is not explicitly referenced in the LCP.	Low The Project has committed to respecting freedom of association and collective bargaining among its workforce, with a grievance mechanism available for resolution of worker claims.
12	Right not to be subjected to slavery, servitude or forced labour	Use of forced labour is prohibited by national law. However, enforcement of the laws can be uneven and women, refugees and migrants are particularly vulnerable to labour trafficking in Turkey, and are primarily employed for activities such as domestic servitude, street begging and prostitution. While it is estimated that a	Medium Use of forced labour does not appear to be a common practice within the construction industry in Turkey, though the risk is still present particularly for vulnerable populations such as refugees and migrants.

¹ Turkey has also ratified ILO Convention 98 on the right to organise and collective bargaining and Convention 87 on freedom of association and protection of the right to organise.

#	Human rights	Project context	Risk assessment
		<p>significant number of migrants informally work in the construction industry, forced labour and slavery do not appear to be a common practice in this industry.</p> <p>Forced labour is defined in the Project's LCP, which prohibits the use of forced labour among its subcontractors and suppliers. The LTA has required various corrective measures to ensure that the prohibition of forced labour on the Project site is enforced, including regular control and monitoring of workers and working conditions, and protection of labour rights for migrant workers, if any.</p>	<p>The Project's LCP includes commitments on prohibition of forced labour, while sufficient corrective measures have been identified in the ESAP concerning monitoring and control of terms of employment, and commitments concerning oversight of subcontractors and suppliers.</p> <p>An additional commitment will be included in the LCP concerning the Project Company's commitment to assessing and monitoring suppliers for risk of use of forced labour.</p> <p>Once implemented, the risk will be appropriately addressed.</p>
13	Right of protection for the child	<p>Turkey is a signatory to the UN Convention on the Rights of the Child and use of child labour is prohibited by national law, with children younger than 16 prohibited from performing arduous or dangerous work. However, illicit practices of child labour continue, and governmental resources are often insufficient to monitor and enforce penalties against the practice. Use of child labour is primarily concentrated in seasonal agriculture such as production of hazelnuts (with 57% of all working children aged 6-14 involved in this sector), with smaller numbers in street work (e.g. vending and begging), small or medium industry (e.g. textiles, footwear, and garments) and construction. Syrian and Afghan refugee children are particularly vulnerable. Statistics on the use of child labour within Karapinar District are not available.</p> <p>The Project's LCP requires its subcontractors and suppliers to ensure all workers meet the legal age limit, while the LMP also states that contractors shall ensure no child labour or youth worker is employed on site.</p>	<p>Medium</p> <p>Use of child labour persists as a risk in the construction industry, though it is not as prevalent as within the agricultural and manufacturing industries.</p> <p>The Project's LCP includes commitments on prohibition of child labour, while appropriate corrective measures have been identified in the ESAP concerning the regular monitoring of workers' ages.</p> <p>An additional commitment will be included in the LCP concerning the Project Company's commitment to assessing and monitoring suppliers for risk of use of child labour.</p> <p>Once implemented, the risk will be appropriately addressed.</p>
14	Right to social security, including social insurance	<p>The Turkish Labour Law provides for both a full pension and an old age allowance, in addition to unemployment and disability pensions. The Project's LCP includes provisions on the terms of employment that will be provided to all workers in an equitable manner, including social security.</p>	<p>Medium</p> <p>Once the provisions of the Project's LCP have been incorporated into the LMP as required in the ESAP, this risk will be appropriately addressed.</p>
Social, economic and cultural rights			

#	Human rights	Project context	Risk assessment
15	Right to an adequate standard of living and housing	<p>Workers</p> <p>A temporary worker accommodation facility will be established on site during the construction phase. A Camp Site Management Plan has been developed, setting out the standards that will be applied to this facility in line with IFC's 'Workers' Accommodation Processes and Standards Guidance Note' to ensure that workers are provided adequate living conditions. The Construction Camp Area Control List document is used to identify non-compliances within the camp site and corrective measures to be taken.</p> <p>Local communities</p> <p>Fifteen herders in the five local settlements² who use the Project area for grazing purposes will experience longer journeys to reach the site of up to an hour a day during the grazing season due to the Project activities. 15 out of the 34 ovine cattle owners use the Project area and are thus directly impacted. The herders have indicated that while this increase in journey time is an inconvenience, it will not impact their livestock activities, costs, or incomes in a significant manner, and the herds can walk this additional path without difficulties or having to stop. The Project Company has established 2 animal passageways and 4 transition ramps within the construction site to facilitate unrestricted access to pasture area.</p> <p>Local residents' right to housing will not be affected by the Project as no physical displacement will take place.</p>	<p>Low</p> <p>Adequate measures are in place to maintain and monitor living standards for workers housed on site.</p> <p>Local herders' living standards are not expected to be impacted by the increased journey time required to reach the pasture lands. Additional support measures will be implemented to further support the herders' livelihood activities as part of the mitigation measures identified in the ESIA, in line with the Project Company's other community initiatives within the local settlements.</p>
16	Right to health, food, water and sanitation	<p>Workers</p> <p>The rates of occupational incidents in Turkey have been decreasing in recent years, with the rate of workplace accidents per 100,000 workers declining by 12% and fatal accidents by 52% between 2009 and 2013. Following a series of fatal incidents in mines in 2014, a national OHS action plan was developed to further improve safety records and implement additional OHS regulations. National regulations require all employers to monitor compliance with OHS measures on site, conduct an OHS risk assessment and provide personal protective equipment free of cost.</p>	<p>Medium</p> <p>Appropriate corrective measures have been identified in the ESAP to minimise risks to the health and safety of workers. Once implemented, the risks will be sufficiently managed.</p> <p>Additionally, implementation of the corrective actions concerning monitoring and management of Project transport, emissions and waste as identified in the</p>

² Buyukkarakuyu, Kucukkarakuyu, Kirkitoğlu, Ekmekçi and Seyithacı

#	Human rights	Project context	Risk assessment
		<p>The Project's Occupational Health and Safety Management Plan (OHSMP) includes provisions to mitigate OHS risks for workers and minimise threats to their right to health and safety. Several corrective actions have been identified by the LTA within the ESAP, to improve the OHSMP as further detailed in Table 3 below.</p> <p>Local communities</p> <p>Potential risks to local residents' health as identified in the ESIA include temporary noise impacts during the construction phase, traffic incidents, air pollution, contamination of water sources and risks associated with influx of the workforce. Utility water for the Project site will be sourced from the Karapinar Municipality's water network and will not affect local residents' access to water. Dust emissions and wastewater generated by the Project present the risk of contamination of air as well as groundwater wells used by villagers of the nearest settlements, to the west of the Project site. The LTA has identified corrective measures regarding the frequency and duration of ongoing monitoring studies for key receptors, consideration of additional mitigation measures should national or IFC limits be exceeded, and oversight of the Karapinar Municipality's construction of the wastewater treatment plant.</p>	<p>ESAP will sufficiently address risks to local communities' rights to health, water and sanitation.</p>
17	Right to take part in cultural life	<p>The local cultural heritage authority has opined that there are no cultural or natural assets located within the Project site or AoI. The Project has developed a Chance Find Procedure to manage any chance finds encountered on site.</p>	<p>Low</p> <p>No cultural or archaeological impacts are expected that would present a risk to the right to cultural participation.</p>
Rights of minorities			
18	Rights of members of ethnic, religious and linguistic minorities to enjoy their own culture, practise their religion, and speak their language	<p>Given its central, transcontinental location, Turkey has a sizeable population of Syrian refugees of nearly 3.6 million, around 330,000 refugees and asylum seekers from other nations (including Afghanistan, Iraq and Iran), as well as migrants from nearby regions.³ Turkish ethnic groups comprise approximately 70 to 75% of the national population, Kurdish 19%, and other ethnic minorities 7 to 12%. Religious minorities are also present including Jewish and Christian groups, among others, who have experienced religious intolerance with anti-Semitic rhetoric in the press frequently reported.</p>	<p>Medium</p> <p>Non-discrimination clauses are included in the Project's LCP including discrimination based on ethnic and religious backgrounds. Additional measures to incorporate rights of minorities within the ESMS will be implemented, including promotion of employment and training opportunities targeting minority groups such as</p>

³ Including Armenia, Georgia, Turkmenistan, Uzbekistan and Egypt

#	Human rights	Project context	Risk assessment
		<p>As the national census does not collect information on ethnic, religious or other origins, the exact populations of minority groups in Karapinar District is unknown. However, a small number of Kurdish residents and Syrian refugees appear to be present.</p> <p>Tension and conflicts between Turkish host communities and Syrian refugees have been reported including in Konya Province where the Project is located. In 2017, a protest in the town of Karapinar targeted Syrian houses and workplaces, leading the police to evacuate the refugees to a safer location. Similar incidents targeting Syrian refugees occurred in other districts of Konya Province in the same year. While such incidents have not been widely reported in subsequent years, anti-refugee sentiments may still persist given the refugees' ongoing presence in Turkey.</p>	<p>Syrian refugees, liaison with workers belonging to minority groups to identify specific concerns, and permission for workers to observe diverse religious holidays. Through such measures, the risk to rights of minorities will be appropriately addressed.</p>

5 Mitigation Measures

The below table lists the environmental and social action plan (ESAP) items previously identified by the LTA within the 2020 ESDD report which will sufficiently manage the human rights risks identified in this scoping report, once implemented.

The current status of implementation of these actions is updated separately within the Project's ESAP tracker.

Table 3: ESAP actions (2020) with human rights relevance

ESAP #	Applicable human right	Relevant ESAP item	Responsibility	Timeframe
1	Right to life, liberty and security	Disclose code of conduct to security personnel Update training plan for security workers to include human rights and cultural sensitivity training	Project Company/Kalyon İnşaat	Prior to financial close
2.1	Right to equality before the law, equal protection of the law and non-discrimination	Adopt and implement a Project Labour Commitment Policy making it applicable to all direct employees and contractors/sub-contractors, suppliers involved in the Project. Translate the Policy into Turkish and make available to all employees	Project Company	Prior to financial close and implement during construction
2.2	Right to equality before the law, equal protection of the law and non-discrimination Right to social security, including social insurance	Ensure that the topics included in the Labour Commitment Policy are elaborated in Labour Management Plan in line with IFC PS2 to act as a guideline for human resources management (i.e. equal opportunity, non-discrimination, employment terms etc.).	Project Company/ Contractors	Prior to financial close
2.3	Right to equality before the law, equal protection of the law and non-discrimination	Increase the awareness and consciousness about gender equality among its employees Ensure that workplaces are gender neutral (i.e. have separate toilets for female workers on site and social facilities)	Project Company/Contractors	During construction Prior to financial close
2.7	Right not to be subjected to slavery, servitude or forced labour Right of protection for the child	Regularly control personnel database of contractors and subcontractors against presence of child and forced labour. Check credentials of supply chain before contracting in terms of forced labour, child labour and health and safety in the supply chain If there will be migrant workers in the construction phase of the Project, ensure that the conditions provided to migrant workers are in compliant with PS2 and that migrant workers are treated the same as non-migrant	Project Company/Contractors	During construction

ESAP #	Applicable human right	Relevant ESAP item	Responsibility	Timeframe
		workers. Passports and travel documents of migrant workers must not be retained by the Project		
2.9	Right to health, food, water and sanitation	<p>Workers</p> <p>Revise and improve the roles and responsibilities, OHS risks, mitigation measures and include OHS management system structure and risk assessment in the OHSMP.</p> <p>Fulfil the national and international OHS requirements, including:</p> <ul style="list-style-type: none"> • Undertake a training needs analysis (TNA) to identify the training requirements for each role • Provide OHS training to all workers • Have approved risk assessments • Conduct annual emergency drills • Develop a permit to work system • Establish the OHS committees and arrange regular meetings • Prepare tools and equipment periodical inspection inventory • Take preventive and protective measures at hazardous materials storage areas • Monitor OHS performance at the construction site by KPIs 	Project Company	Prior to financial close
3.2 3.9	Right to health, food, water and sanitation	<p>Local communities</p> <p>Revise the ESIA and Dust and Air Emission Control Plan to include dust monitoring frequency and duration considering the results of initial monitoring study. In addition, include coordinates of selected sensitive receptors in the Plan.</p> <p>Continue PM10 monitoring study within the frequency defined in the Dust and Air Emission Control Plan throughout the construction site. In case the limits are exceeded, additional mitigation measures such as stopping/pausing work at the construction areas close to the western edge of the Project site during the windy/dry weathers should be considered.</p> <p>Revise recent noise monitoring report to include hourly daytime, evening time and night time noise levels during the five days and provide comparison with respective national noise limits (70 dBA for day time, 65 dBA for evening time and 60 dBA for night time) and IFC noise limits (55</p>	Project Company/Kalyon İnşaat	<p>Prior to financial close</p> <p>During construction</p>

ESAP #	Applicable human right	Relevant ESAP item	Responsibility	Timeframe
		dBA for day time and 45 dBA for night time) Ensure that future noise monitoring reports are also prepared accordingly.		Prior to financial close and implement during construction

Table 4 below identifies the additional mitigation measures proposed to further enhance the Project’s protection of human rights and minimise risks to human rights. These are to be implemented in addition to the ESAP actions previously identified shown in Table 3.

Table 4: Additional mitigation measures to be implemented

#	Applicable human right	Mitigation measure	Responsibility	Timeframe
1	Right to equality before the law, equal protection of the law and non-discrimination	Include commitment on non-discrimination and equal protection of people with disabilities in the Labour Commitment Policy (LCP).	Project Company	Before start of Phase 2
2		Include commitment on zero tolerance policy towards harassment in the LCP. Provide awareness-training sessions on harassment to workers, and means to submit grievances related to harassment.	Project Company/ Contractors	Before start of Phase 2 Throughout Phase 2
3		Update training plan for security workers to include religious tolerance and sensitivity training	Project Company/Kalyon İnşaat	Before start of Phase 2
4		Develop a procedure detailing how the Project Company will aim to meet the 3% target for recruitment of persons with disabilities, and conduct ongoing monitoring of this target	Project Company	Before start of Phase 2
5	Right to privacy	Include commitments to data protection and privacy and details on how digital and physical data will be stored and secured, within relevant E&S policies and procedures.	Project Company/ Contractors	Before start of Phase 2 Throughout Phase 2
6	Right to freedom of opinion, information and expression	Update the worker and community grievance mechanisms, with commitments to allow submission of anonymous or confidential claims, and protection of claimants from retribution from the Project.	Project Company	Before start of Phase 2
7		Include in the LCP a commitment to conducting in employment processes and decisions including those related recruitment, promotion and dismissals in a non-biased manner, with no prejudice based on workers’ political and religious views.	Project Company	Before start of Phase 2

#	Applicable human right	Mitigation measure	Responsibility	Timeframe
8	Right not to be subjected to slavery, servitude or forced labour Right of protection for the child	Include in the LCP a commitment to assessing and monitoring suppliers for risk of use of forced and child labour.	Project Company	Before start of Phase 2
9	Rights of members of ethnic, religious and linguistic minorities to enjoy their own culture, practise their religion, and speak their language	Conduct meetings with local authorities and NGOs to determine the current status of Syrian refugee settlements in Karapinar District. If significant numbers of Syrian refugees are identified as residing in the District, discuss with the local authorities and NGOs potential campaign to promote employment and training opportunities for refugees on the Project site.	Project Company	Within one month of start of Phase 2
10		Conduct liaison with workers belonging to minority ethnic and religious groups to identify any specific concerns, on an ongoing basis.	Project Company	Within one month of start of Phase 2 and ongoing
11		Include in the LCP commitment to allow workers to observe diverse religious holidays and practices.	Project Company	Before start of Phase 2
12		Translate the Project's Labour Commitment Policy into other languages as applicable if migrant or refugee workers are present on site	Project Company	Before start of Phase 2

6 Conclusion

Based on an assessment of the human rights risks associated with the Project, this scoping study finds that six of the 18 human rights are considered medium-risk, while the remaining twelve are low-risk. Many human rights risks persist across Turkey particularly relating to the excessive use of force by public security forces, repression of freedom of speech, use of child and forced labour in certain industries, occupational health and safety practices, and discrimination against members of ethnic and religious minority groups. However, within the context of the Project, we consider that these risks can be adequately mitigated and addressed through existing E&S management plans and procedures, ESAP items, and additional mitigation measures identified within this report.

7 Sources

General human rights aspects

<https://www.amnesty.org.uk/human-rights-turkey>

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