

European Bank for Reconstruction and Development

# Project Feasibility Assessment Sustainable Infrastructure Group - Adiyaman Wastewater Network

## Non - Technical Summary

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## List of Abbreviations

EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESA	Environmental and Social Assessment
ESP	Environmental and Social Policy
EU	European Union
H&S	Health and Safety
LMP	Labour Management Plan
NTS	Non-Technical Summary
OHS	Occupational Health and Safety
PM	Particulate Matter
Project	The Project for Rehabilitation of Wastewater Network of Adiyaman
PRs	Performance Requirements
SEP	Stakeholder Engagement Plan
WGM	Workers' Grievance Mechanism

# 1. Project Description

The European Bank for Reconstruction and Development (EBRD) is considering financing the "Adiyaman Wastewater Network Rehabilitation Project" to support the reconstruction of critical water and wastewater infrastructure in Adiyaman, heavily impacted by the February 2023 earthquakes. The project aims to restore vital services and enhance long-term infrastructure resilience in the region.

The project involves rehabilitating a 429 km network in Adiyaman's central districts, including 355.7 km of sewerage and 76.9 km of stormwater systems. Adiyaman Municipality will oversee project implementation, with İller Bankası (ILBANK) acting as the implementation agency, providing the EBRD financing to the Municipality.

An Environmental and Social Assessment (ESA) has been conducted to evaluate the project's impacts and ensure compliance with EBRD's policies and Turkish regulations. The assessment identified the project as a Category B, with limited, manageable local environmental and social impacts. Mitigation measures have been proposed where necessary.

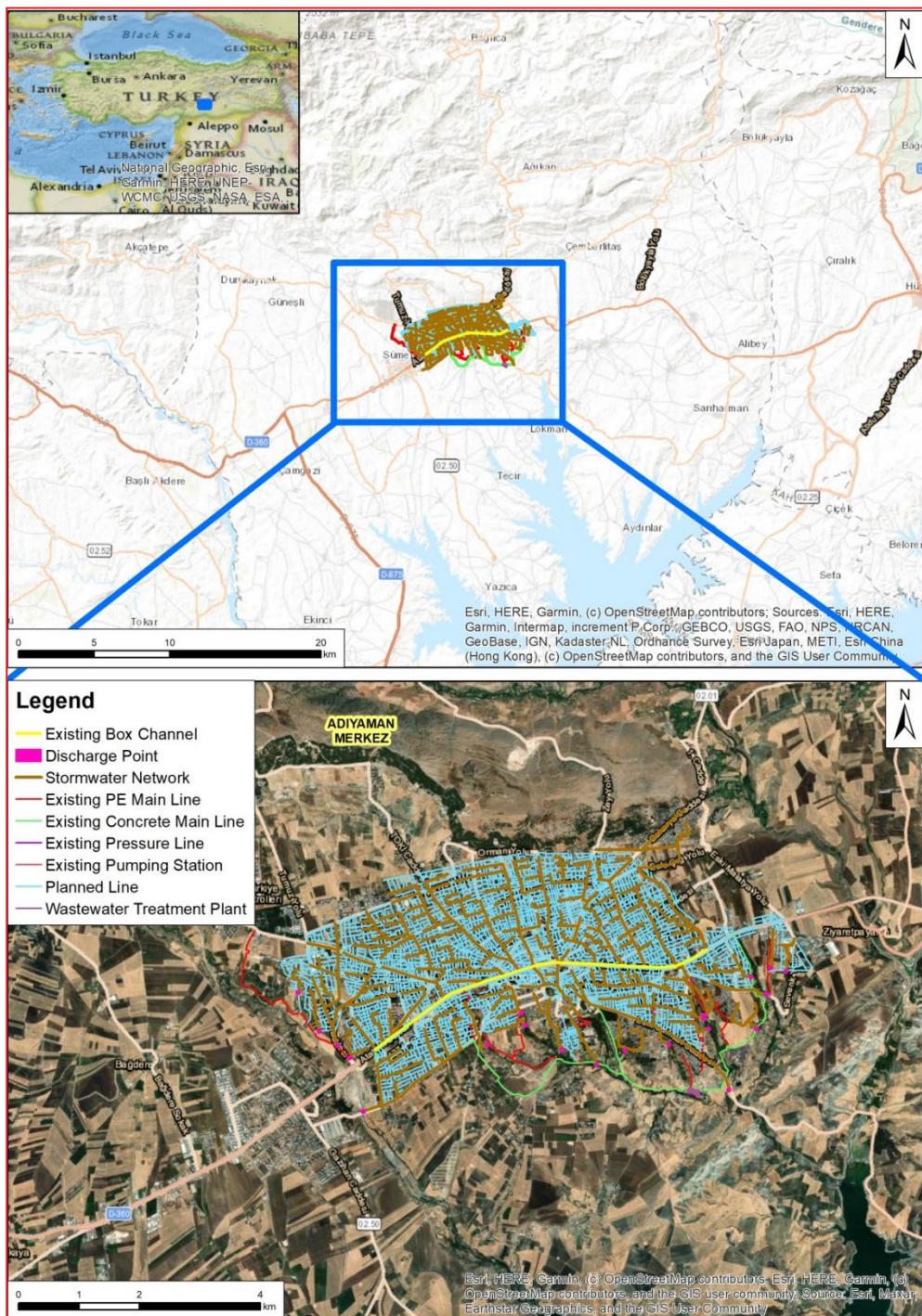
The project includes renewing wastewater and stormwater lines, with the wastewater system connecting to the Adiyaman Wastewater Treatment Plant, which was damaged by the earthquake. A new treatment plant with a capacity of 10,364 m<sup>3</sup>/day will also be constructed, though these works are outside the scope of the project.

The construction phase is expected to last 36 months, with an estimated workforce of 300 people during construction and 20 during operations, prioritizing local hiring. The project will comply with EBRD's Performance Requirements, national legislation, and international best practices. This Non-Technical Summary report has been prepared specifically for the Adiyaman Wastewater Network Rehabilitation Project.

## 1.1 Project Location

The Project for Rehabilitation of Wastewater Network of Adiyaman ("the Project") will take place in Adiyaman, a historically rich city in southeastern Anatolia. Located at a strategic crossroads between Eastern and Southeastern Anatolia, Adiyaman borders Kahramanmaraş, Malatya, Diyarbakır, Şanlıurfa and Gaziantep. The city covers an area of 7,871 km<sup>2</sup> and is positioned along the Euphrates (Fırat) River, one of Türkiye's major rivers. Additionally, the province is home to the Atatürk Dam, one of the world's largest dams.

Adiyaman was part of Malatya province until 1954 when it became its own province. The city's geographical location is shown in the figure below.



**Figure 1: Project Location**

Adiyaman Province consists of 9 districts, including the central district and 406 villages. These districts are Centre, Besni, Çelikhan, Gerger, Gölbaşı, Kahta, Samsat, Sincik and Tut. The province covers an area of 1,702 km<sup>2</sup> and has an altitude of 669 meters.

## 1.2 Aim of the Project

The main objective of this project is to develop a sustainable and resilient urban infrastructure that meets national and international standards, especially after the February 2023 earthquake in Adiyaman. The project aims to improve the city's wastewater and rainwater management systems, reduce the effects of natural disasters and provide basic services.

A 355.7 km sewerage network including 26,007 household connections will be constructed to create a functional and efficient wastewater management system. A 76.9 km stormwater system including 4,671 street entrances and 23 outfall structures will be constructed to reduce the risk of flooding and increase the city's resilience to stormwater management challenges.

The Adiyaman Central Wastewater Treatment Plant (32,808 m<sup>3</sup>/day capacity), which was partially damaged by the earthquake, will be renovated. In addition, a 2-stage Wastewater Treatment Plant with an initial capacity of 10,364 m<sup>3</sup>/day will be constructed to improve wastewater treatment capacity. Since the renovation and construction of this wastewater treatment plant cannot be financed by this project, it is considered as an associated facility.

Both wastewater and stormwater networks will be gravity fed and there will be no need for pump stations and associated electrical requirements. The project evaluation was carried out for two phases. These are;

- Construction Phase:

Site preparation, trench excavation, soil stabilization, pipe placement, manhole installation and compaction.

- Operation Phase:

Routine maintenance, storm curtain cleaning, pipeline repairs and gas/odor control.

This project not only aims to rebuild and improve basic infrastructure, but is also important in increasing the capacity of Adiyaman Municipality to address future disaster resilience.

## 2. Background to the Project

### 2.1 Rationale of the Project

The Project arises in response to the severe impact of the February 2023 earthquakes, which caused widespread damage to infrastructure in southeastern Türkiye. With over 14 million people affected and thousands displaced, the earthquakes disrupted essential services, including water supply, wastewater systems and stormwater management. This Project aims to restore and upgrade Adiyaman's wastewater and stormwater networks, essential for improving the city's resilience to future disasters, reducing flooding risks and enhancing overall environmental quality.

### 2.2 Legal Aspects and Compliance with Relevant Environmental and Social Laws

The Project is committed to meeting both national legal requirements and the standards set by the European Bank for Reconstruction and Development (EBRD). It will be designed in compliance with Türkiye's environmental and social laws and the EBRD's Environmental and Social Policy (ESP) and Performance Requirements (PRs). The Project will also adhere to international agreements related to environmental protection and sustainable development.

Various national legislation and international conventions and standards explained in the following paragraphs are also to be complied with during different stages of the Project, including construction and operation. Applicable Turkish environmental and social regulations/standards are:

- Environmental Law (Law No. 2872)
- Regulation on Environmental Impact Assessment (Official Gazette dated July 29, 2022, and numbered 31907)
- Regulation on Waste Management (Official Gazette dated April 2, 2015, and numbered 29314)
- Regulation on Soil Pollution Control and Point Source Contaminated Sites (Official Gazette dated July 8, 2010, and numbered 27605)
- Regulation on Water Pollution Control (Official Gazette dated December 12, 2004, and numbered 25687)
- Regulation on Environmental Noise Control (Official Gazette dated November 30, 2022, and numbered 32029)
- Cultural Heritage Management under Law on the Conservation of Cultural and Natural Assets (Law No. 2863)
- Labour Law (Law No. 4857)
- Law on the Right to Information (Law No. 4982)
- The Occupational Health and Safety Law (Law No. 6331)
- Türkiye Building Earthquake Regulation (Official Gazette dated March 18, 2018, and numbered 30364)

Following the devastating earthquakes of February 2023, new regulations have been introduced to ensure that infrastructure projects, especially those in seismic regions, are built to withstand future earthquakes. The project will comply with the Turkish Seismic Design Code (TS 500) and related regulations, which govern structural design, material use, and safety measures to enhance resilience against earthquakes. In line with the seismic requirements, construction materials must meet the Turkish Standards for Concrete (TS EN 206), which are critical for ensuring the durability and stability of the infrastructure, especially in the face of seismic risks. This is essential for ensuring long-term operational efficiency and safety.

The European Bank for Reconstruction and Development (EBRD) Performance Requirements (PRs) are a set of guidelines that ensure projects financed by the bank meet high environmental and social standards. These requirements cover various aspects of project development, including:

- PR1: Environmental and Social Impact Assessment - Ensures that potential environmental and social impacts are identified, assessed, and managed.
- PR2: Labour and Working Conditions - Promotes fair labour practices and safe working conditions.
- PR3: Resource Efficiency and Pollution Prevention - Focuses on minimizing environmental harm through efficient resource use and pollution control.
- PR4: Community Health, Safety, and Security - Ensures that the project does not harm local communities and that any risks to their health and safety are managed.
- PR5: Land Acquisition and Involuntary Resettlement - Addresses issues related to land acquisition, displacement, and resettlement.
- PR6: Biodiversity Conservation and Sustainable Management of Living Natural Resources - Ensures that biodiversity is protected and that natural resources are used sustainably.
- PR7: Indigenous Peoples - Protects the rights of indigenous communities and ensures their participation in project decisions.
- PR8: Cultural Heritage - Safeguards cultural heritage sites and resources affected by the project.
- PR9: Financial Intermediaries - Sets requirements for projects financed through financial intermediaries to meet the same standards.

- PR10: Stakeholder Engagement - Promotes ongoing dialogue with stakeholders to ensure their concerns are addressed throughout the project lifecycle.

These PRs guide the implementation of projects to ensure they are socially responsible, environmentally sustainable, and aligned with international best practices. PR 5, PR 7, PR9 are not triggered in this project.

The project is not subject to the EIA process. The Iller Bank (ILBANK) is the implementing institution of the project. Adiyaman Municipality is the beneficiary of the Project and is responsible for its local implementation. Contractors and Suppliers are responsible for carrying out construction, rehabilitation and operational works.

The stakeholder engagement process follows a structured approach to ensure transparency and active participation throughout the project. Local communities and stakeholders are informed about the project and are involved at an early stage to address concerns.

Regular meetings, public consultations and project updates will be published to ensure stakeholders are informed. Stakeholder feedback will be continuously integrated into the development of the project to ensure its success and minimize negative impacts.

This engagement process ensures that the project complies with both EBRD Performance Requirements and Turkish legislation, while encouraging positive relationships with affected communities and stakeholders.

### **2.3 Current Environmental and Social Situation and Considerations**

Adiyaman's infrastructure, especially its wastewater and stormwater systems, were severely damaged by the 2023 earthquakes. Many pipelines were ruptured, and the stormwater system became less efficient, which increased the risk of floods. The Project must address these challenges, improving the environmental and social conditions in the city, especially for vulnerable communities that have been displaced or are still living in damaged areas.

### **2.4 History of the Project Development and Planning**

The Project was initiated as part of Türkiye's broader recovery efforts after the 2023 earthquakes. The EBRD will finance the construction of new wastewater and stormwater networks and related infrastructure improvements in Adiyaman. The Project will be implemented by Adiyaman Municipality, with financing provided by EBRD, through Iller Bankası A.Ş. (ILBANK). The main alternatives for rebuilding the infrastructure were considered, with an emphasis on minimizing environmental and social impacts while improving the long-term resilience of the city's infrastructure.

## **3. Environmental and Social Assessment Process of the Project**

The Environmental and Social Assessment, a summary of which is presented in this document, was conducted as an important part of the Project. It ensures that environmental and social factors are considered and integrated into the design and decision-making processes from the start. In this case, the Project is classified as Category B by EBRD standards, with moderate environmental and social risks that can be managed and mitigated with targeted measures. The ESA report focuses on identifying these risks and determining appropriate mitigation measures to be incorporated into the Project design.

For this Project, the environmental and social impacts are localized and manageable, in line with the EU's guidelines for EIA compliance. The Project's moderate risks, such as impacts on local communities and the environment, are managed through tailored mitigation measures, ensuring compliance with EBRD, EU and national environmental protection standards.

The local communities and stakeholders have the opportunity to raise concerns or objections during the Project's consultation phases. Measures will be put in place to mitigate any adverse effects and any objections raised will be considered and integrated into the final project design, where necessary.

## 4. Environmental Benefits, Adverse Impacts and Mitigation Measures

### 4.1 Land Use Planning and Changes

The planned network within the scope of the project will be built on the existing network line and does not require land acquisition. Since the project will not require a pumping system, there will be no electricity connection.

### 4.2 Water Resources, Impacts and Management Measures

Adiyaman province's primary water resource is the Euphrates River, which flows for 180 km through the region and is supplemented by tributaries such as the Kahta, Kalburcu and Göksu Streams. The Atatürk Dam, located 35 km south of Adiyaman, is one of the largest dams in Türkiye and provides vital services for irrigation, energy production and drinking water supply.

Adiyaman's drinking water is primarily sourced from spring water, with key transmission lines delivering water from various sources, including Gürlevik, Tut-Medetsiz, Koru- Palanlı, Kırkgöz and Havşeri. The municipal network supplies around 80% of the water demand, with the remaining 20% drawn from wells operated by enterprises. The city's drinking water infrastructure includes seven service tanks, with four of them chlorinated. While the recent earthquake caused some damage to drinking water lines, most pipes were replaced as part of the FRIT Project, ensuring no significant disruptions to water access for local residents.

Recent water quality tests confirmed that Adiyaman's drinking water meets the standards set for human consumption, with the only exception being a slightly elevated nitrite concentration due to regional agricultural activities, though still within acceptable limits.

To prevent environmental harm, the Project will follow strict regulations, including the Regulation on Water Pollution Control, EBRD Performance Requirements and EU Water Directive. Construction activities will be carefully managed to prevent contamination of water resources, with special measures to avoid accidental release or leakage of petroleum-based products such as fuels, lubricants and hydraulic fluids. These materials will be stored in designated areas with secondary containment to minimize the risk of pollution to soil, surface water and groundwater.

To further prevent possible contamination, portable toilets will be used during excavation in densely populated areas and domestic wastewater will be collected in a temporary septic tank before being transferred to the wastewater collection system by licensed sewer trucks. All construction units that interact with water or chemicals will be built with impermeable concrete to prevent any leakage into the environment.

During the construction phase, vehicles will not be washed using surface water and steps will be taken to avoid runoff or wastewater generation during dust suppression activities. The amount of water used for dust control will be carefully monitored to ensure efficiency.

These water management practices are designed to safeguard water resources, prevent contamination and ensure that both construction and operation phases are carried out with minimal environmental impact.

### 4.3 Habitats, Ecology (Flora and Fauna) and Nature Conservation, Impacts and Management Measures

The potential impacts of the proposed construction activities on the biological environment, both terrestrial and aquatic, have been assessed. These impacts are expected to affect the local flora and fauna directly or indirectly, though the region is already influenced by human activities such as settlements and agriculture, which lessens the overall impact.

#### Terrestrial Flora and Fauna:

The Project Area does not include any sensitive or critical habitats. Construction activities may cause temporary disturbance due to dust and noise, which may affect agricultural areas and fauna living in the area.

However, these effects are expected to be short-term and after construction, the natural vegetation is anticipated to recover.

No significant impacts on flora and fauna populations are anticipated, as the area is urban and already altered by human presence.

#### **Aquatic Environment:**

The nearby streams have been influenced by human activities and no significant aquatic biodiversity, such as fish species, has been identified. Construction activities will not change the water quality or affect riparian vegetation. Therefore, the impact on aquatic life is considered negligible.

#### **Protected Areas:**

There are no protected areas within or near the Project area. As a result, the impact on these areas is negligible.

#### **Mitigation Measures and Conclusion:**

While impacts on the biological environment are expected to be low, mitigation measures such as controlling dust, noise and waste management are recommended to minimize any potential negative effects. If these measures are followed, the biodiversity is expected to remain stable or recover after construction.

The overall environmental impact on both terrestrial and aquatic ecosystems is minimal, and with proper management, the Project is not expected to significantly harm local flora, fauna or biodiversity. The impact during the operational phase is anticipated to be negligible.

### **4.4 Landscape and Visual Impacts, Impacts and Management Measures**

Adiyaman is home to the famous Mount Nemrut, a UNESCO World Heritage Site, known for its ancient statues and breath taking views. The province also features beautiful valleys, plateaus and natural water bodies, contributing to its unique landscape. In rural areas, traditional villages and agricultural fields reflect the province's cultural and economic heritage. Urban centres blend modern development with historical sites, giving Adiyaman a rich visual and environmental character.

Located in southeastern Türkiye, Adiyaman is part of the Southeastern Anatolia Project (GAP). While it is close to larger cities like Gaziantep and Şanlıurfa, it faces challenges in taking full advantage of the agricultural benefits of GAP. The Atatürk Dam, which submerged fertile land and the region's mountainous terrain have limited the effectiveness of irrigation projects. Furthermore, the dam construction also disrupted road links with nearby provinces. Adiyaman's tourism, particularly around Mount Nemrut, faces competition from neighbouring cities like Malatya. Despite development efforts, the province remains economically dependent on nearby urban centres.

During the construction phase, activities such as excavation, trenching, and removal of vegetation may temporarily affect the landscape and create visual disturbances. These impacts are expected to be short-term, local, and of low significance. There will be no permanent loss of aesthetics, and any trees affected by excavation will be transplanted or replaced by new plantings, if possible. Additionally, any damage to roads or borders will be restored to their original condition.

To minimize the Project's impact on landscape and visual, several mitigation measures will be implemented during the construction phases:

- Visual pollution will be reduced by using relevant curtains (separators) whenever feasible in regard to discomfort that will be caused during the works. Furthermore, photographs and information about the city will be placed on the separators which will bring a more aesthetic look.
- Materials to be used during construction will be stored in closed and protected environment.
- All kinds of road, pavement, wall, pole, etc. damaged during the works will be repaired and restored.

In the operational phase, no significant impacts on the landscape are expected. Any maintenance activities will be localized and carefully managed to minimize any effect on the surrounding area.

## 4.5 Air Quality, Impacts and Management Measures

During the Project field visit in Adiyaman, significant debris was observed, contributing to dust formation. A continuous air quality monitoring station in central Adiyaman provides data on PM<sub>10</sub> and SO<sub>2</sub> levels, which are within the legal limits set by both EU and Turkish regulations. The data also includes averages before and after the earthquake. Coal and natural gas are commonly used for heating and the municipality has distributed awareness materials regarding air pollution.

The construction activities may lead to dust formation and air pollution, which could negatively impact sensitive receptors such as hospitals, schools, residential areas, livestock and agricultural land. Special attention will be given to minimizing these impacts, particularly in vulnerable areas. The contractor, in collaboration with Adiyaman Municipality, will implement several measures to limit dust and air pollution during construction.

During the construction phase, air quality impacts will primarily result from dust emissions, vehicle movement, and exhaust emissions from heavy machinery (e.g., trucks and excavators). Dust will be generated mainly from vehicle movement on unpaved roads and earthworks. Exhaust emissions will include NO<sub>2</sub>, CO, HC, SO<sub>2</sub>, and PM, depending on vehicle conditions and fuel quality.

Dust and exhaust emissions will affect local residents, as well as parks, gardens, fruit trees, and ornamental plants in the project area. To mitigate these impacts, dust suppression measures will be implemented.

To minimize the Project's impact on air quality, several mitigation measures will be implemented during both the construction and operation phases:

- Measures include careful handling of excavated materials to prevent dust, soil stack monitoring and wind shields/barriers where necessary. Water trucks will be used for dust suppression, especially in dry conditions. PPE, such as dust masks, will be provided to workers in areas with excessive dust levels.
- The contractor will assess the presence of sensitive receptors before starting work and ensure that extra care is taken near these locations. The prevailing wind direction will also be monitored to avoid affecting these areas.
- Vehicles will have speed limits (30 km/h on unpaved roads) to minimize dust and vehicle routes will avoid densely populated areas. Well-maintained machinery and vehicles will be used to reduce emissions. Regular maintenance will ensure that equipment does not produce excessive exhaust emissions.
- Workers will receive training on emissions control and dust management.
- An Asbestos Management Plan will be developed to ensure safe handling and disposal of asbestos-containing materials in case of encountering any asbestos containing material during the implementation of the Project. If asbestos is detected in existing infrastructure and needs to be removed, a specialist contractor will need to be engaged. A certified expert will oversee the work and waste will be disposed of according to regulations.

During the operation phase, there will be no adverse impacts with regard to air quality. In case of unusual conditions during the operation phase, the short-term odour that may be caused by wastewater kept in the sewerage network may affect the people. Periodic maintenance of sewer and stormwater networks requires the use of machinery and vehicles, which can emit pollutants such as carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), and particulate matter (PM). However, since the number of vehicles used will be very small, these effects are local and negligible.

## 4.6 Climate Conditions and Meteorology

The climate of the province differs between the northern and southern parts. Summers are hot and dry, while winters are rainy. The north is colder in winter than the south. The average annual temperature is 17.4°C, with a highest of 45.3°C in July and a lowest of -14.4°C in January.

Annual precipitation averages 715.1 mm, with low rainfall in summer. Winds are generally from the northwest in summer, providing relief from the heat, while southerly winds bring rainfall in winter. The region occasionally experiences droughts, affecting agriculture and water availability.

The materials used during construction (concrete, asphalt, etc.) can cause the heat to be retained more on the surface. This can increase the surrounding temperatures, especially in the summer months, and strengthen the heat island effect. During the operation phase, it is important that the infrastructure used in the project is resistant to climatic conditions. In particular, increasing temperatures, heavy rainfall or drought can affect the efficiency of the system. In order to adapt to such climatic conditions, the infrastructure must be durable.

To minimize the Project's impact on climate change, several mitigation measures will be implemented during both the construction and operation phases:

- Optimal utilization of the available construction equipment and materials will be followed in such a way that reduces greenhouse gas emissions.
- Speed restrictions will be adopted by construction vehicles and equipment to optimize fuel efficiency.
- Regular maintenance of construction vehicles and equipment will be applied.
- Energy uses associated with construction vehicles and equipment will be monitored.
- The area of land clearance required will be minimized.
- Efficient driving guidelines to transportation vehicle drivers to promote fuel efficiency will be provided.

#### **4.7 Noise and Vibration; Impacts and Management Measures**

In Adiyaman, a mix of urban, semi-urban and rural areas experiences varying levels of environmental noise, influenced by residential, industrial and natural factors. Fieldwork for the Project revealed that many areas have been damaged by earthquakes and are undergoing reconstruction, which has contributed to additional construction-related noise. Industrial activities in manufacturing and construction zones generate significant localized noise, while everyday activities in residential areas, such as commercial operations and daily routines, create moderate noise levels. In rural and semi-rural areas, ambient noise is mainly shaped by natural sources like wind and wildlife sounds.

Environmental noise in Türkiye is regulated by the Regulation on Environmental Noise Control (RENC), which aims to minimize disturbances to public peace and protect the physical and mental health of individuals exposed to environmental noise. This regulation includes provisions for noise mapping, acoustic reporting and environmental noise assessments to determine noise exposure levels, as well as mandates for action plans to reduce the negative effects of noise on human health and the environment.

The construction activities in Adiyaman will lead to increased noise from reconstruction efforts, industrial zones and daily residential activities, with potential noise impact on sensitive receptors such as hospitals, schools and agricultural areas, as well as risks of structural damage from vibrations near significant construction sites.

To minimize the Project's impact on noise and vibration, several mitigation measures will be implemented during both the construction and operation phases:

- Construction will be conducted during daytime hours (07:00–19:00) to comply with noise regulations.
- Noise screens and mufflers will be installed on machinery whenever feasible.
- Regular maintenance of equipment will be carried out to minimize noise.
- Vibration limits will be adhered to, with corrective actions taken if exceeded.
- Structural assessments will be conducted for buildings within 50 meters of vibration sources.
- Noise levels will be monitored in sensitive areas(residential areas, educational institutions, hospitals and healthcare facilities, etc.).
- A grievance mechanism will be established for noise complaints.
- Communication with local residents will be provided in advance of construction activities.

- During the procurement of equipment and machinery, the sound levels specified in the technical specifications/data sheets will be considered.
- The relevant provisions and limit values of the Regulation on Environmental Noise Control will be followed during the operation phase.

## 4.8 Waste Management

Adiyaman's waste management is centred on the Regular Waste Storage Facility, which has been operational since 2022. The city generates approximately 260 tons of waste daily. Domestic waste is treated at the Sanitary Landfill, where pre-treatment methods like mechanical separation and composting are used. Some waste, including medical and hazardous waste, is managed by licensed companies and sent to specialized disposal facilities.

In 2023, various types of waste were collected, including paper, plastic, metal and hazardous waste. Medical waste is handled under strict regulations and waste oils are stored and sent to licensed disposal sites.

### Construction Phase Waste Management

During the construction, waste will be sorted into organic, recyclable and non-recyclable categories. Non-recyclable waste will be regularly collected and sent to the landfill. Waste oils and hazardous waste will be properly stored and disposed of in licensed facilities.

### Operation Phase Waste Management

During the operation, waste from maintenance and excavation will continue to be sorted and reused where possible. Hazardous waste will be safely stored and sent for proper disposal, ensuring no waste is improperly handled.

During the construction and operation phases of the project, wastewater will be generated from personnel. During the construction phase, wastewater will be collected in a leak-proof septic tank to be built near the construction site, then will be withdrawn at regular intervals with vacuum trucks and will be purified by being delivered to the currently operating wastewater treatment plant. The sludge from the Wastewater Treatment Plant is dried in the same plant. The sludge from the Wastewater Treatment Plant is sent to the Adiyaman Municipality Wild Waste Storage Area.

## 4.9 Raw Material Sourcing and Transportation

Raw materials required for the Project (concrete, pipes, construction materials, etc.) will be sourced from local suppliers whenever possible and transportation will be carried out in the most efficient ways to minimize environmental impact. During transportation, transportation plans will be organized and appropriate transportation vehicles will be used to avoid increasing traffic density. The use of recycled materials will also be encouraged.

## 4.10 Road Safety, Impacts and Management Measures

During Project construction, the use of heavy construction machinery and transportation-related vehicles in particular may pose a risk to road safety. To minimize these risks, traffic arrangements will be made, signage will be strengthened and speed limits will be set in areas close to the construction site. In addition, trained traffic managers and safety officers will be deployed to prevent traffic accidents during road works in the Project area. Adiyaman Municipality will ensure the contractor develops and implements a Traffic Management Plan in line with EBRD Environmental and Social Policy and Performance Requirements.

During the operation phase of the project, road safety will be managed through a comprehensive traffic management plan to minimize disruptions, ensure smooth traffic flow, and protect pedestrians. Clear signage, advanced warning systems, and public awareness campaigns will be implemented to inform the public about maintenance activities and alternative routes. Pedestrian safety will be ensured by creating temporary pathways and using traffic marshals in high-traffic areas. All workers will receive regular safety training, and ongoing inspections will monitor the effectiveness of safety measures. Coordination with local authorities will be maintained to address any road safety issues promptly, ensuring the safe movement of vehicles, pedestrians, and workers throughout the operational phase.

## **4.11 Associated Infrastructure Impacts and Management Measures**

The Project may affect local infrastructure, including water supply, sewage systems, roads, utilities, waste management and energy supply. To manage these impacts, the Project will coordinate with relevant departments, such as the Water and Sewerage Department, to prevent disruptions and provide temporary solutions if necessary. Traffic management plans will be implemented to minimize road closures and ensure safe access, while utility lines will be identified and protected in collaboration with local service providers. Additionally, waste management practices will align with local policies to ensure proper disposal and recycling and efforts will be made to coordinate with energy providers to prevent overloading the local grid. Community members will be notified of any temporary disruptions through local media, social media, and direct communication. In case of utility disruptions, such as electricity or internet services, these will be minimized by working closely with local providers, and temporary solutions will be put in place. Any impacts will be communicated promptly to the affected public, and updates will be provided as needed.

## **4.12 Cumulative Impacts**

The ESA study has considered the potential cumulative effects of other existing and planned projects in the region. In addition to the Project, there are ongoing drinking water and infrastructure projects under construction in the area. Multiple project activities are creating additional cumulative environmental and social impacts.

These impacts include:

- Traffic and noise impacts due to the increased traffic during the construction of sewage and stormwater pipelines, in addition to the traffic load in the city.
- Wastewater and solid waste generation resulting from construction activities of the Projects, which will increase pollution load at discharge points and in waste management.
- Restricted access to drinking water for the local population due to project activities (e.g., water cuts, other infrastructure impacts).
- Positive impacts on the local economy due to the activities of the Projects.

## **4.13 Consistency with Policy, Law and Other Plans**

The Project will comply with Turkish legislation, the EBRD's Environmental and Social Policy (ESP) and Performance Requirements (PRs) in line with environmental, social and economic objectives. It will also be designed and implemented in line with local government and municipal plans. The Project will also collaborate with relevant state institutions and authorities, including the Ministry of Environment and Urbanization, the Disaster and Emergency Management Authority (AFAD), and other local agencies, particularly in the event of emergencies such as natural disasters. Coordination with these institutions will ensure that appropriate emergency response plans are in place, and the Project will contribute to enhancing the region's resilience to such events. Furthermore, the Project will work closely with other utility and service providers to ensure the seamless integration of services and avoid disruptions during emergency situations. This collaborative approach will ensure that the Project not only meets regulatory requirements but also supports broader community and government objectives, especially in the context of disaster preparedness and recovery.

## **4.14 Environmental Management Plans, Mitigation Measures and Compensatory Measures**

A detailed Environmental Management Plan (EMP) will be prepared to manage the environmental impacts of the Project. This plan will include measures to be implemented to prevent environmental degradation during construction and operations. Mitigation measures will include measures to minimize potential impacts identified in areas such as water resources, air quality, soil health and biodiversity.

The Environmental and Social Assessment of the Project includes management plans and procedures for both the construction and operation phases of the Project and these are provided in the table below, together with guidelines for the preparation of sub-management plans to be prepared by the contractor.

**Table 1: Required Management Plans and Procedures for the Project**

Management Plans/Procedure	Stage to be Prepared	Responsible Party	Monitoring & Reporting Party	Approving Party
<b>Construction Phase</b>				
Chance Find Procedure	Prior to pre-construction	Construction Contractor	Construction Contractor	ILBANK
Community Health, Safety, and Security Management Plan	Prior to pre-construction	Construction Contractor	Construction Contractor	ILBANK
Traffic Management Plan	Prior to pre-construction	Construction Contractor	Construction Contractor	ILBANK
Occupational Health and Safety Management Plan	Prior to pre-construction	Construction Contractor	Construction Contractor	ILBANK
Contractor and Sub-contractor Management Plan	Prior to pre-construction	Adiyaman Municipality	Construction Contractor	ILBANK
Excavation Safety Procedure	Prior to pre-construction	Construction Contractor	Construction Contractor	ILBANK
Code of Conduct	Prior to pre-construction	Adiyaman Municipality	Construction Contractor	ILBANK
Zero Waste Management Plan	Prior to pre-construction	Construction Contractor	Construction Contractor	ILBANK
<b>Operation Phase</b>				
Chance Finds Procedure	Prior to operation	Adiyaman Municipality	Adiyaman Municipality	ILBANK
Occupational Health and Safety Management Plan	Prior to operation	Adiyaman Municipality	Adiyaman Municipality	ILBANK
Labour Management Plan	Prior to operation	Adiyaman Municipality	Adiyaman Municipality	ILBANK
Code of Conduct	Prior to operation	Adiyaman Municipality	Adiyaman Municipality	ILBANK
Zero Waste Management Plan	Prior to operation	Adiyaman Municipality	Adiyaman Municipality	ILBANK

## 5. Social Benefits, Adverse Impacts and Mitigation Measures

### 5.1 Socio-Economic Impacts

The Adiyaman central district has 49 neighbourhoods, of which 32 are urbanized. The Project will impact 28 of these neighbourhoods directly, while 4 neighbourhoods—Alitaşı, Barbaros Hayrettin, Karapınar and Yeni—will be indirectly affected. The area of influence for the Project spans all 32 urbanized neighbourhoods within the Centre district, which is one of the nine districts of Adiyaman province.

#### Economic Characteristic

Adiyaman's economy is primarily driven by agriculture, which accounts for 17.1% of the GDP, significantly higher than the national average. The services sector contributes 56.4% and industry 26.5%, both slightly below national averages. Adiyaman's GDP per capita is \$4,092 and the province is transitioning from an agriculture-based economy to one with more emphasis on industry and services. Employment rates are lower than the national average and the province faces higher unemployment, indicating a need for targeted economic interventions.

The region has notable industries in crude oil extraction, mining support and waste management. Two Organized Industrial Zones (OIZs) and a Small Industrial Site (SSI) contribute to local employment. Primary sources of income for residents include construction, industry and the public sector.

Socio-economic disparities are evident, with most residents in middle to lower-income groups. Adiyaman's literacy rate is 94.95%, below the national average, with significant gender gaps, as female literacy is much lower than male literacy. Education duration averages 8.6 years, slightly below the national average and there is a noticeable disparity in educational access between urban and rural areas. Efforts to improve education and reduce gender disparities are needed.

### 5.2 Impacts on Businesses and Employment

The Project is expected to create temporary employment, with 300 direct workers, 50% of whom are expected to be locals. Efforts will be made to source materials and services locally to support the regional economy. Local businesses near construction sites may experience short-term disruptions, including reduced accessibility, noise, dust and odor, potentially affecting all businesses in the city. This will be managed through clear communication via announcements and digital platforms, with safety measures, dust and noise control, and complaint resolution ensured through municipal channels.

### 5.3 Impacts to Existing Infrastructure

The survey results indicate a decline in satisfaction with the wastewater infrastructure following the earthquake. Prior to the disaster, 9 out of 23 neighbourhoods were satisfied with the system, but this number decreased to 5 afterward. Additionally, 12 neighbourhoods reported no changes in the condition of the wastewater infrastructure, while 7 observed a decline in satisfaction levels post-earthquake.

Regarding infrastructure issues, 5 neighbourhoods experienced serious problems with sewage systems and 11 neighbourhoods reported moderate issues. In terms of drinking water, 3 neighbourhoods identified serious concerns, while 6 reported moderate issues. Malazgirt and Sümerevler neighbourhoods were noted for facing challenges in both sewage and drinking water systems, requiring immediate attention.

The most common problems with the wastewater system included blockages, insufficient capacity and the outdated, fragile nature of the infrastructure. The neighbourhoods with the most significant issues were Sümerevler, Siteler and Yenipınar, highlighting the urgent need for upgrades in these areas.

## 5.4 Traffic and Accessibility Management

Adiyaman Municipality will ensure the contractor develops and implements a Traffic Management Plan in line with EBRD Environmental and Social Policy and Performance Requirements. The plan must be prepared at least 30 days before construction begins and will include staff training on its implementation. Key elements of the plan include:

- A phased construction schedule, work start and end dates and an overview of current conditions near construction sites.
- Identification of sensitive receptors and impacted areas to propose mitigation measures.
- Traffic diversion strategies, such as material transport routes, entry/exit points, parking areas and intersections.
- Temporary pedestrian and vehicle pathways, signage and traffic control measures in languages responsive to the needs of local communities (e.g., barriers and warning systems).
- Routes for oversized vehicles, construction access, loading/unloading zones and supply vehicle roads.
- Anticipated interactions between pedestrians and vehicles, with related safety measures.
- Responsibilities of personnel for traffic management and emergency response procedures.
- Compliance with a 30 km/h speed limit for all vehicles, with clearly visible project area markings.
- Community information via brochures, posters and direct communication in languages responsive to the needs of local communities at local centers.
- Minimization of peak-hour disruptions and training for project drivers on road safety and traffic rules.
- Adherence to vehicle weight limits and transportation of hazardous materials by licensed carriers.
- Coordination with local authorities on heavy vehicle routes and advance public communication.
- Securing construction sites to prevent unauthorized access and repairing any road damage caused by the Project.
- Restoration of impacted roads post-construction and installation of clear traffic and warning signs. Work will be restricted to daytime hours, with special considerations for vulnerable groups during route planning.

## 5.5 Land Acquisition

No land acquisition is required for this project. The Project will be carried out on existing infrastructure, focusing on improvements and repairs. Because most of the pipeline is over public roads, there will be no need for new land purchases or property transfers. The Project will be implemented by upgrading and modernizing the current areas, with an emphasis on enhancing capacity and functionality.

## 5.6 Contractor Management

Contractor management will ensure safety, comply with environmental standards and ensure compliance with Turkish laws and international EBRD Performance Requirements. Contractors will be held accountable for meeting these standards, particularly in terms of labour rights, occupational and community health and safety.

## 5.7 Community Health and Safety

The construction phase will affect 28 neighbourhoods in Adiyaman, with 4 others experiencing indirect impacts. The infrastructure renewal will impact almost the entire urban area. The municipality has

committed to completing excavations within the same day and avoiding night work to minimize disturbances. Key risks include:

**Physical Safety Risks:** Open trenches, excavation sites and heavy machinery present risks, especially in areas with vulnerable groups like the elderly and disabled, particularly in neighbourhoods such as Esentepe, Yavuz Selim and Kayalik.

#### **Public Health Risks:**

**Airborne Dust:** Construction activities may worsen air quality, affecting those with respiratory issues. Dust suppression measures, such as watering, covering materials, and using enclosed trucks, will be implemented.

**Noise Pollution:** Loud construction noise and vehicle operations can disrupt sleep and cause stress, with Kayalik, Yeni, Eskisaray and Malazgirt being the most impacted. Work will be limited to daytime hours, noise barriers will be used, and complaints will be addressed.

**Water Contamination:** Risks to drinking water quality due to infrastructure work are heightened in Malazgirt and Sümerevler due to existing issues with water pressure and leakage. Water quality will be monitored, and drainage systems will prevent contamination.

**Social and Psychological Impacts:** The extended construction period and lack of communication may lead to stress and anxiety, especially in areas with vulnerable populations such as Yeni, Siteler and Sümerevler. Regular updates, a grievance mechanism, and safety measures will be in place to reduce disruptions.

## **5.8 Working Conditions, Labour Management and Occupational Health and Safety**

This section of the report reviews the labour and working conditions for the Adiyaman Municipality's Wastewater Network Project, focusing on workforce management, health and safety and the handling of subcontractors. The assessment compares Turkish labour laws with EU standards and highlights challenges due to the recent earthquake.

The Project plans to hire 300 workers for the construction phase, half of whom will be local. Ensuring fair employment practices, worker safety and adherence to legal standards is crucial, especially in the post-earthquake context. The Project aims to provide a safe working environment, protect workers' rights and maintain compliance with both local and international labour standards.

Overall, the Project seeks to manage labour effectively, ensuring fair treatment and safety while addressing challenges caused by the earthquake.

### **Worker-Employer Relations**

The Adiyaman Municipality Project focuses on maintaining respectful and fair worker-employer relationships. It ensures that employment is voluntary, with no forced labour and promotes equal opportunities for all workers regardless of gender, race or other factors. Workers will have the right to form unions and engage in collective bargaining without fear of retaliation. Open communication between workers and management will be encouraged to address concerns effectively. The goal is to create a dignified, safe and supportive work environment for all employees.

### **Grievance Related Issues**

A grievance mechanism will be implemented to resolve worker complaints fairly and promptly covering both direct project workers and contractor workers, protecting their rights and the Project's reputation.

### **Worker's Rights**

The Adiyaman Municipality Project prioritizes workers' protection by ensuring their health and safety, fair working hours and proper wages. It will follow safety regulations to prevent hazards, guarantee fair wages and ensure workers aren't exploited. Overtime pay will be in line with local laws and working hours will

comply with legal limits. The Project will also follow international labour standards, including those from the ILO, to protect workers from child labour, forced labour and ensure fair conditions for all.

### Work Force

A total of 300 workers are expected to be employed for the project, with 150 recruited locally, while the remaining workforce will be sourced from external labour pools.

### Occupational Health Safety Related Impacts

This section reviews the Adiyaman Municipality Project's OHS practices to ensure compliance with national laws and international standards, such as EBRD PR 2 and PR 4, during both construction and operation. The assessment involved examining physical conditions, existing OHS policies, previous project performance and the municipality's capacity to manage safety. The goal is to ensure worker safety through alignment with both Turkish regulations and international safety standards.

### Contractor and Supplier Management

Adiyaman Municipality will ensure contractors and subcontractors comply with national and international labour standards, conducting regular monitoring to uphold workers' rights. Contractors and subcontractors will be required to implement the Project's occupational health and safety policies and their workers will have access to grievance mechanisms.

The construction main contractor will develop and implement a Labour Management Plan (LMP), ensure stakeholder communication, maintain transparency and establish a grievance mechanism to resolve workers' concerns. They will also ensure compliance with national and international standards on child and forced labour.

### 5.9 Vulnerable and Disadvantaged Groups

Measures will be implemented to protect vulnerable groups during construction. For children and the elderly, construction zones will be clearly marked and safe, accessible pathways will be provided. Low-income groups will have minimal disruption to transportation routes and any structural damage to nearby housing will be monitored and compensated. For individuals with disabilities, accessible routes and regular updates will be provided, with temporary transportation services to minimize disruption and ensure access to essential services. Multilingual signage and announcements will be used to ensure clear communication, particularly for refugees, so they can access information and grievance mechanisms effectively.

### 5.10 Social Management Plans, Mitigation Measures and Compensatory Measures

Social Management Plans, Mitigation Measures and Compensatory Measures to be implemented in the Adiyaman Municipality project, to minimize the impacts of the Project on the society.

#### Social Management Plans

The Social Management Plans (SMP) will be prepared to address and manage social impacts throughout the Project lifecycle. These plans include stakeholder engagement, grievance mechanisms and managing social risks that may arise during construction and operation. The Municipality's Social Expert/CLO will be responsible for overseeing the SMP implementation, ensuring the effective handling of social issues identified in the ESA report and managing the grievance mechanism (GM). The existing Alo 153 Hotline, along with the Municipality's website and other communication channels, will serve as the primary tool for receiving grievances and ensuring timely responses. The Municipality will track and address complaints, with an organized process for verification, investigation and feedback.

#### Mitigation Measures

A selection of specific mitigation measures to reduce negative social impacts are described in the ESA report. These measures will focus on minimizing disruptions to local communities, preventing adverse effects on vulnerable groups and enhancing the positive social outcomes of the Project. Some of the key mitigation actions include:

- Implementing occupational health and safety measures for workers and nearby communities.
- Ensuring proper stakeholder engagement through ongoing consultation and participation in decision-making processes.
- Managing potential impacts on local infrastructure, such as roads and water services, by ensuring proper coordination with the relevant authorities.

### Compensatory Measures

If adverse social impacts cannot be fully mitigated, compensatory measures will be employed.

These measures may include:

- Compensation for any involuntary land acquisition or displacement, ensuring fair compensation and resettlement assistance for affected individuals and communities.
- Offering alternative livelihood support and restoration programs for individuals whose livelihood may be affected by the Project activities.
- Continuous monitoring of affected communities during both the construction and operational phases to ensure compensation is sufficient and effective.

These plans and measures aim to ensure that the social impacts of the Project are well-managed, any negative impacts are minimized and communities that are affected by the Project are properly supported. Regular monitoring and reporting will be conducted to assess the effectiveness of these measures, ensuring compliance with the ESA report and relevant regulations.

## 5.11 Cultural Heritage, Impacts and Management Measures

Adiyaman is a city rich in historical and cultural heritage, home to significant archaeological sites, religious monuments and civil structures. Key landmarks include Mount Nemrut, a UNESCO World Heritage site and the Arsameia Sanctuary, both reflecting the region's ancient history. Notable religious sites are the Grand Mosque, Eskisaray Mosque and St. Paul Church, representing the city's diverse religious heritage.

Following the 2023 earthquakes, some damage was reported in local cultural sites. The Adiyaman Museum suffered minor damage, while the Grand Mosque was completely destroyed. Other mosques experienced moderate to severe damage.

The city centre contains 97 registered immovable cultural assets, including 26 archaeological sites, 22 religious structures and 49 civil buildings. These sites are protected under local and national regulations, ensuring the preservation of Adiyaman's heritage.

Significantly, since all of the Project will take place on public roads, where the existing infrastructure is already located, no cultural or historical assets in the Project area are at risk of being affected by development. However, as a precautionary measure, a Chance Finds Procedure will be developed and implemented.

## 6. Monitoring of Impacts

The planned monitoring activities for various environmental and social impacts throughout the different phases of the Project are summarized below:

**Air Quality:** During the construction and operation phases, dust and particulate matter (PM<sub>10</sub>) levels will be monitored. Additionally, maintenance and exhaust emission decal records of all machinery and equipment will be reviewed. Complaints related to air quality will also be tracked.

**Soils and Land Use:** In the construction and operation phases, the number of spill or leakage incidents will be recorded, along with the corrective measures taken to address these issues in accordance with national and international standards. Complaints related to land use and soil contamination will also be monitored.

**Environmental Noise:** Throughout all phases of the Project, noise levels (measured in decibels) will be monitored whenever there is a complaint, particularly focusing on working hours. Complaints related to noise disturbances will also be recorded.

**Waste Management:** In all project phases, the waste management plan, along with records of waste handling and temporary storage areas, will be monitored to ensure proper waste disposal practices are followed.

**Landscape and Visual:** During the construction phase, any grievances related to landscape changes and visual pollution will be recorded and addressed accordingly.

**Community Health, Safety and Security:** Throughout all phases, on-site observations will be made regarding the work sites and traffic management. Additionally, records of stakeholder consultations and related grievances will be kept to ensure community health and safety.

**Labour Force and Working Conditions:** In all phases, the number of incidents related to labour force and working conditions will be monitored. Training requirements, as well as the number of training hours provided to workers, will be documented. Worker grievances and the agreements with contractors and sub-contractors will also be tracked.

**Workers/Occupational Health and Safety:** In the construction and operation (maintenance and repair), health and safety (H&S) records will be maintained, covering accidents, employment and training. The emergency preparedness plan will be followed and personnel grievances will be documented. Additionally, the periodical review and monitoring of the ESA report performance will be conducted. The existence and validity of legal environmental and health and safety permits will be verified.

Information collected through these monitoring activities will be crucial for improving management plans at every phase of the Project. While impact assessments aim to cover all potential impacts and provide appropriate responses, unanticipated issues may still arise. Monitoring will ensure that such unforeseen impacts can be managed or mitigated before they escalate into significant problems. By continuously gathering relevant data, the monitoring process will optimize the implementation of mitigation/management plans and support effective environmental protection throughout the Project's lifecycle.

## 7. Stakeholder Engagement

Within the scope of the ESA studies carried out for the Project, the Stakeholder Engagement Plan (SEP), which is a public document, was prepared. The SEP was developed as a public document to present stakeholder engagement, consultation and disclosure programme, including the requirements of national environmental legislation and relevant international environmental and social standards, as well as the EBRD PR10 Environmental and Social performance requirements. The SEP will be accessible on the Adiyaman Municipality website ([www.adiyaman.bel.tr](http://www.adiyaman.bel.tr)).

In the context of the Project, it's crucial to identify stakeholders early on to inform them about the Project and ensure their active involvement. Specifically, the following individuals and groups should be informed:

- Individuals likely to be directly or indirectly affected by the Project
- Entities with an interest in the Project
- Entities with potential to influence Project outcomes or municipality operations

Additionally, it's essential to identify vulnerable or disadvantaged groups likely to be impacted by the Project during stakeholder identification.

Potential stakeholders who may be affected by or influence the Project include:

- National and local public institutions and organizations
- Non-Governmental Organizations
- Local residents
- Local businesses
- The Project personnel, including contractors

### 7.1 Grievance Mechanism

Adiyaman Municipality addresses public grievances and feedback through a variety of accessible communication channels, ensuring timely and effective responses to local concerns. The primary grievance mechanism (GM) involves the use of the 153 hotline, available 24/7 with a dedicated team working in shifts. In addition, grievances can be submitted through:

- **Adiyaman Municipality's Website:** <https://www.adiyaman.bel.tr/BIZE-ULASIN>
- **Adiyaman Municipality's Phone:** 0 (416) 999 16 99
- **Adiyaman Municipality's WhatsApp:** 0 (416) 216 17 22
- **Adiyaman Municipality's Hotline:** 153
- **Adiyaman Municipality's E-mail:** [iletisim@adiyaman.bel.tr](mailto:iletisim@adiyaman.bel.tr)
- **E-mail for official mail:** [adiyamanbelediyebaskanligi@hs01.kep.tr](mailto:adiyamanbelediyebaskanligi@hs01.kep.tr)
- **Address for Official Letter:** Alitaşı Neighbourhood Ataturk Avenue No.144 Centre, 02100 Centre/Adiyaman

In the Project, Alo 153 will remain the main grievance channel and the grievance management process will follow a structured approach:

- Grievance uptake
- Sorting and processing
- Acknowledgment and follow-up

- Verification, investigation, action
- Monitoring and evaluation
- Provision of feedback

The grievance mechanism aims to ensure that all complaints are addressed, recorded and followed up on effectively, with improvements in system processes and communication channels ongoing.

# Appendix A

## GRIEVANCE/COMMENT FORMS

### Grievance/Comment Form (Notification and Communication Opening Form)

GRIEVANCE/COMMENT FORM	
<b>Case #</b>	
<b>Complainant full Name (Optional – You may leave this field blank if you prefer to remain anonymous.)</b>	
<b>Contact Information</b> Please mark how you wish to be contacted (Mail, telephone, e-mail)	<p><b>By Post:</b> <i>(Please provide mailing address)</i></p> <p><b>By Telephone:</b></p> <p><b>By E-mail:</b></p>
IDENTIFICATION OF THE CONCERN / INCIDENT / GRIEVANCE	
<b>Description of Concern / Incident / Grievance</b> What is your grievance? What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
<b>Date of Concern / Incident / Grievance</b>	<p><b>One-time incident/grievance (Date )</b></p> <p><b>Definition</b></p>
RESOLUTION PROPOSAL	
<b>What would you like to see happen to resolve the problem?</b>	
<p>Date:</p> <p><b>Please return this form to:</b></p> <ul style="list-style-type: none"> <li>• Details will be provided further.</li> </ul>	