



Kocaeli Hastane Yatırım ve Sağlık Hizmetleri A.Ş. (Kocaeli or SPV)

Kocaeli Integrated Health Campus Project (KİP)

DOCUMENT NUMBER:

KİP-ESMS-TRA-001

DOCUMENT TITLE:

TRAFFIC MANAGEMENT PLAN – FINAL

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APPROVED

TRAFFIC MANAGEMENT PLAN**PURPOSE SCOPE**

This Management Plan has been developed in accordance with SPV policies, the commitments undertaken by SPV in the ESA, Turkish regulatory framework, IFC Performance Standards (in Particular PS3 and PS4), IFC General and Sector specific EHS Guidelines, EBRD Performance Requirements (in Particular PR3 and PR4), OPIC Environmental and Social Policy Statement and EDC.

The purpose of this plan is to maintain traffic safety of the road and to prevent the risks which may outcome due to the fact that the traffic load available will increase during the construction phase of the Project. In addition, this management plan includes consideration of transport of hazardous materials and/or wastes through populated areas, where unavoidable, in coordination with community leaders and local authorities and traffic safety measures for the residents.

It includes guidelines and minimum requirements for EPC Contractor for defining its own procedure appropriate to the nature and scale of the Project Construction phase.

APPLICATION

This Management Plan applies to the Project Construction phase only; the Operation phase aspects will be addressed in separate documents. It applies to construction work activities under the control of SPV, of EPC Contractor and Subcontractors and to all KİP employees.

DEFINITIONS

Kocaeli or SPV:	Kocaeli Hastane Yatırım ve Sağlık Hizmetleri A.Ş.
Kocaeli Integrated Health Campus Project (or "KİP" or simply "Project"):	Kocaeli Integrated Health Campus Project, being executed by SPV or its affiliates
EPC Contractor (or simply EPC):	Gama – Türkerler Kocaeli Adi Ortaklığı & Gama Türkerler Dubai
Site Management:	All key managerial roles involved in the Construction Site management, mainly referring to the EPC Contractor's personnel.
Environmental and Social Management System (ESMS)	The complete set of documents (including but not limited to: policies, manuals, plans, procedures, work instruction and records) developed to address, manage, monitor, audit and review the environmental, social, health and safety aspects of the KİP, aimed at mitigating potential ESHS risks and impacts and improving ESHS performance.
Guidelines to EPC Contractor	Guidelines to EPC for the development of its own ESMS and associated EPC Contractor Procedures appropriate to the nature and scale of the Project are contained in SPV ESMS documentation. SPV ESMS documentation, identify also minimum requirements and specific responsibilities for EPC Contractor in line with the EPC contract.
Construction Site:	The Construction Site includes all areas impacted in any manner by the construction activities.
Environmental and Social Management Plans (ESMPs)	Plans issued by SPV addressing significant Environmental and Social aspects (as identified in the ESA) by defining specific management methods, mitigation measures, monitoring activities, reporting, auditing and review.

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EPC Contractor Procedure	A procedure to be prepared by EPC, to be used by EPC to describe how the mitigation and monitoring measures/actions outlined in SPV ESMPs are actually implemented.
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ACRONYMS

KİP	Kocaeli Integrated Health Campus Project
SPV	Kocaeli Hastane Yatırım ve Sağlık Hizmetleri A.Ş.
Golder	Golder Associates Turkey Ltd. Şti.
BAT	Best Available Technology
CRD	Community Relation Department
CRO	Community Relation Officer
EBRD	European Bank for Reconstruction and Development
EDC	Export Development Canada
EHS	Environmental, Health and Safety
EPC	Engineering Procurement and Construction
EPRP	Emergency Preparedness and Response Plan
ES	Environmental and Social
ESHS	Environmental, Social Health and Safety
ESA	Environmental and Social Assessment
ESMP(s)	Environmental and Social Management Plan(s)
ESMS	Environmental and Social Management System
ESAP	Environmental and Social Action Plan
EU	European Union
GHG	Greenhouse Gas
GIIP	Good International Industry Practice
HRD	Human Resources Department
HRM	Human Resources Manager
HS (or OHS)	(Occupational) Health and Safety
IFC	International Finance Corporation
ISO	International Organization for Standardization
KPI	Key Performance Indicators
OHSAS	Occupational Health and Safety Assessment Scheme
OPIC	Overseas Private Investment Corporation
PR	Performance Requirement (issued by EBRD)
PS	Performance Standard (issued by IFC)
QRA	Quantitative Risk Analysis
SEP	Stakeholder Engagement Plan
WHO	World Health Organization

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TRAFFIC MANAGEMENT PLAN**1.0 PURPOSE AND SCOPE OF THE PLAN**

This Management Plan has been developed in accordance with SPV policies, the commitments undertaken by SPV in the ESA, Turkish regulatory framework, IFC Performance Standards (in Particular PS3 and PS4), IFC General and Sector Specific EHS Guidelines, EBRD Performance Requirements (in Particular PR3 and PR4), OPIC Environmental and Social Policy Statement and EDC. Where no national regulation or international standard/guideline applies, it considers the adoption of Good International Industry Practices (GIIP).

This management plan describes the requirements for the management of traffic during Construction phase and basic traffic safety measures for the residents.

Traffic Management Plan identifies the measures aimed at minimizing impacts of the traffic generated by the Project. In particular it is aimed at maintaining traffic safety of the road and to prevent the risks which may outcome due to the fact that the traffic load available will increase during the construction phases of the Project. This plan also set out the basic traffic safety measures for the residents. The detailed measures will be identified in the EPC Contractor's specific Traffic Management Procedure. This plan will be reorganized for Operation phase.

The Management Plan includes guidelines and minimum requirements for EPC Contractor for defining its own procedure appropriate to the nature and scale of the Project Construction phase.

This Plan has to be read in conjunction with the ESMS documentation listed below:

Source	Document Title
KİP-ESMS-HAZ-001	Hazardous Material Management and Monitoring Plan
KİP-ESMS-GRM-001	Grievance Mechanism Procedure
KİP-ESMS-WAM-001	Waste Management Plan
KİP-ESMS-SPL-001	Spill Response Plan
KİP-ESMS-CHS-001	Community Health and Safety Plan

TRAFFIC MANAGEMENT PLAN**2.0 BACKGROUND POLICIES AND STANDARDS**

This section includes the policies, standards and requirements of reference for this plan that are applicable, but not limited to, for the Project during Construction phase.

A number of qualitative performance parameters have been identified in section 4 and 5 below, derived from ESA commitments, Turkish regulation, IFC Performance Standards, EHS Guidelines, EBRD Performance Requirements, OPIC Environmental and Social Policy Statement and EDC as well as from GIIP.

2.1 National standards and regulations

TITLE	Turkish Official Gazette Number and Date
Air quality	
Regulation on Control of Exhaust Gas Emission and Quality of Fuel and Diesel	28837, 30/11/2013
Regulation on Decreasing the Ozone Depleting Materials	27052, 12/11/2008
Regulation on Reduction of Sulfur Content of Some Fuel Types	27368, 06/10/2009
Regulation on Monitoring Green House Gas Emissions	28274, 25/04/2012
Waste Management	
Regulation on Control of Excavation Soil and Construction Debris	25406, 18/03/2004
Regulation on Control of Waste Batteries and Accumulators	25569, 31/08/2004
Regulation on Wastes Generated from the Use of Radioactive Materials	25571, 02/09/2004
Regulation on Control of Medical Wastes	25833, 22/07/2005
Regulation on Control of End of Life Tires	26357, 25/11/2006
Regulation on Control of PCB and PCTs	26739, 27/12/2007
Regulation on Control of Waste Oil	26952, 30/07/2008
Regulation on Control of End of Life Vehicles	27448, 30/12/2009
Regulation on Landfills (Regular Storage of Wastes)	27533, 26/03/2010
Regulation on Waste Incineration	27721, 06/10/2010
Notice on Recycling of Certain Non-hazardous Wastes	27967, 17/06/2011
Regulation on Control of Packaging Wastes	28035, 24/08/2011
Regulation on Control of Waste Electrical and Electronic Goods	28300, 22/05/2012
Regulation on Management of Radioactive Wastes	28582, 09/03/2013
Regulation on Waste Management	29314, 02/04/2015
Regulation on Control of Vegetative Oils	29378, 06/06/2015
Hazardous Materials	
Regulation on the Transportation of Hazardous Goods by Road	28801, 24/10/2013
Regulation on Preparation and Distribution of Material Safety Data Sheets on Hazardous Materials and Aids.	27092, 26/12/2008
Regulation on the Safely Transportation of Radioactive Materials	25869, 08/07/2005
Noise	
Regulation on Evaluation and Management of Environmental Noise	27601, 04/06/2010
Occupational Health and Safety	
Regulation on Personnel Protective Equipment	26361, 29/11/2006

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TITLE	Turkish Official Gazette Number and Date
Regulation on Procedures and Principles of Health and Safety Training for Employees	28648, 15/05/2013
Regulation on Use of Personnel Protective Equipment in Workplaces	28695, 02/07/2013
Regulation on Health and Safety Signs	28762, 11/09/2013
Traffic Management	
Traffic Law	18195, 18/10/1983
Regulation on Highway Traffic	23053, 18/07/1997
Regulation on Traffic Signs	18789, 19/06/1985
Regulation on the Road Traffic Safety Provisions during Road Works and Other Lightings and Signings Used during the Works outside the Road or at the Soft Verge of the Road	18789, 19/06/1985

2.2 International standards

Source	Document Title
The Equator Principles Association	The Equator Principles, June 2013
IFC - International Finance Corp.	IFC Performance Standards (PS) and Guidance Notes GN
IFC - International Finance Corp.	IFC PS3 Resource Efficiency and Pollution Prevention
IFC - International Finance Corp.	IFC PS4 Community Health, Safety, and Security
IFC – International Finance Corp.	IFC General EHS Guidelines: Environmental
IFC – International Finance Corp.	IFC General EHS Guidelines: Occupational Health and Safety
IFC – International Finance Corp.	IFC General EHS Guidelines: Community Health and Safety
IFC - International Finance Corp.	IFC General EHS Guidelines: Construction and Decommissioning
EBRD - European Bank for Reconstruction and Development	EBRD PR 3 - Resource Efficiency and Pollution Prevention and Control
EBRD - European Bank for Reconstruction and Development	EBRD PR 4 – Health and Safety
OPIC - Overseas Private Investment Corporation	OPIC Environmental and Social Policy Statements
International Organization for Standardization	ISO 14001:2004 - Environmental management systems -- Requirements with guidance for use
OHSAS Project Group	OHSAS 18001 - Occupational health and safety management systems – Requirements

2.3 Source documents

This section presents source documents, i.e. documents where SPV commitments are sourced from and that are the trigger for the development and implementation of the ESMPs and in general of the ESMS documentation. They are in turn based on Turkish regulatory framework, EBRD Performance Requirements, IFC Performance Standard and Guidelines and OPIC Environmental and Social Policy Statement.

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Document ID	Document Title
ESA Report	Environmental Social Assessment (January, 2016)
KIP-ESMS-SEP-001	SEP - Stakeholder Engagement Plan (January, 2016)

3.0 ROLES AND RESPONSIBILITIES

Principal roles and responsibilities for the implementation of this plan are outlined below.

3.1 EPC Contractor & Subcontractors

EPC Contractor has to ensure sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of this Management Plan.

EPC Contractor have to ensure the effective implementation of this plan by issuing its own Management Procedure addressing, detailing and customizing specific actions, measures and monitoring activities under EPC Contractor's responsibility. The EPC Contractor Procedure has to include a description of allocated resources, responsibilities and communication procedures to relevant personnel.

EPC Contractor has to provide relevant monitoring data and monitoring reports to SPV as indicated in section 7 "Reporting" of this plan.

If any Subcontractor is involved, it is responsible for duly implementing requirements included in EPC Contractor's Procedure under the Contractor supervision.

3.2 SPV

SPV Management has to ensure sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of actions, measures and monitoring activities under SPV's responsibility. SPV Management is responsible for:

- Management Plan final approval;
- taking appropriate actions to address major Non-Conformities based on audit reports, performance monitoring reports and on HSE Manager proposed approach.

SPV HSE Manager is responsible for:

- ensuring that this Management Plan is up to date and appropriate to the nature and scale of the KIP and ensuring that this Management Plan is implemented effectively by EPC Contractor;
- ensuring that action/measures and monitoring activities directly under SPV responsibilities are carried out timely and adequately according to this Management Plan requirements;
- proposing to SPV Management, if necessary, amendments and/or updates to this Management Plan and issuing plan revisions;
- programming inspections and audit activities to ensure the correct implementation of this Management Plan and of EPC Contractor's Procedure;

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- addressing Non-Conformities through the definition of Preventive/Corrective actions;
- bringing major Non-Conformities immediately to the attention of SPV Management;
- collecting, organizing and reviewing monitoring data and performance monitoring reports from EPC Contractor and providing summary results of such reports to SPV Management, to stakeholders and to the Lenders.

4.0 MANAGEMENT METHODS AND MITIGATION MEASURES**4.1 General management criteria**

Traffic Management Plan includes;

- The identification of the transportation routes for the goods and material to and from Project area; consideration of transport of hazardous materials and/or wastes through populated areas, where unavoidable, and coordination with community leaders and local authorities
- Definition of the access roads
- Definition of the speed limits
- Details of the training program for drivers
- Transportation of workforce
- Development of access road register
- Assessment of existing and new access roads before use
- Site specific mitigations to control traffic/ labor safety/ community safety/ impacts to environmentally sensitive areas
- Signage of the roads
- Requirements for vehicle maintenance and inspection
- Training programs for the community

In addition, all the vehicles used within the scope of the project will obey the speed limits defined by the regulations. There are speed limits depending on the type of vehicles and roads identified in Traffic Law No: 2918 and Regulation on Highway Traffic.

The additional vehicle load, vehicle type and count that may be observed in the highway to be used during the construction of the Project will be determined.

4.2 Specific management methods and mitigation measures

The following table details the management methods and mitigation measures/actions identified for traffic management in the Construction phase.

For each method and measure/action identified, the table shows:

- The identification code (ID);

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- the reference (or source) documents (i.e. ESA, Turkish standard, permits, IFC Performance Standards and EHS Guidelines, EBRD Performance Requirements, OPIC or other GIIP);
- frequency/timing of the measure/action, as applicable;
- Key Performance Indicator (KPI), if applicable, and related quantitative target or qualitative acceptance criteria; and
- the related responsibility for implementing the measure/action.

For the measures actions where no KPI can be identified the cells reports “n.a.” (not applicable). In this case an on/off acceptance criteria will apply; in other words the acceptance criteria set is a qualitative one, such as “the measure/action has been implemented effectively”.

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ID.	Source doc.	Mitigation Action/Measure description	Frequency/ Timing	KPI	Target/ Acceptance criteria	Responsi- bilities
Management controls						
TRA-01	ESA - Appendix N ESAP	<p>Develop a specific Traffic Management Procedure including, at least the following information:</p> <ul style="list-style-type: none"> Identify in maps and layouts the roads network for the transportation of goods and material to and from Project area to be used. Eventual alternative routes may also be identified, in case of need. The use of roads not included amongst those identified (including alternatives) will be forbidden. The plan will also identify specific areas to be avoided (e.g. because of the presence of sensitive human receptors or residential areas). <p>Implement traffic safety measures for the residents:</p> <ul style="list-style-type: none"> Scheduling of traffic to avoid peak hours on local roads. Adopting best transport safety practices with the goal of preventing traffic accidents and minimizing injuries suffered by project personnel and the public. Emphasizing safety aspects among project drivers; specifically ensure drivers respect speed limits through built areas and urban centers. Regularly maintaining vehicles to minimize potentially serious accidents 	ongoing	n.a.	Procedure developed and effectively implemented	EPC Contractor
TRA-02	ESA – Section 10.5.3	<p>The Traffic Management Procedure will include the measures for the minimization of the transportation related safety risks. Nevertheless following mitigation measures as a minimum will be included in this Management Plan and will be implemented by EPC Contractor.</p> <ul style="list-style-type: none"> Increased safety awareness among Tavşantepe, Yeşilova quarter and other nearby settlement areas especially on the routes of transportation to the project area will reduce risk of accidents. Therefore, an awareness training will be delivered to community members including the adults and children in nearby settlement area along the transportation routes for increasing the awareness on the project induced hazards (i.e. increased traffic, construction areas and similar). Community members will be informed and consulted for the location of the crossing points; they will be informed on the health and safety precautions and procedures through consultation meetings. Roads and intersections subject to intense construction traffic will be provided with additional mitigation measures such as traffic control, speed reduction systems, warning signals and informing drives on such hotspots. Transport during night-time will be avoided to the extent possible in order to prevent road accidents. 	ongoing	n.a.	Procedure developed and effectively implemented	EPC Contractor

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ID.	Source doc.	Mitigation Action/Measure description	Frequency/ Timing	KPI	Target/ Acceptance criteria	Responsi- bilities
TRA-03	Official Turkish Reg. Gaz. Num. & Date: 23053, 18/07/1997	<ul style="list-style-type: none"> Organize staff transportation to reduce the number of vehicles needed to the extent possible Use traffic control and appropriate signs to highlight warnings and to improve safety especially at intersections and junctions. Use easy-to-read signs to indicate any type of diversion or traffic changes related to Project activities. 	ongoing	n.a.	Procedure developed and effectively implemented	EPC Contractor
TRA-04	IFC - EHS GL – Community Health and Safety § 3.4 EBRD PR 4: Health and Safety § 29 & 30 Turkish Reg. Official Gaz. Num. & Date: 23053, 18/07/1997 Turkish Reg. Official Gaz. Num. & Date: 28801, 24/10/2013	<p>Ensure that the followings measures for traffic safety are in place:</p> <ul style="list-style-type: none"> Implement safe traffic control measures, such as road signs/flag-persons to warn of dangerous conditions; Emphasizing safety aspects among drivers; Use of speed control devices on trucks, and remote monitoring of driver actions; Minimizing pedestrian interaction with construction vehicles; Collaboration with local communities and responsible authorities to improve signage, visibility and overall safety of roads, particularly along stretches located near schools or other locations where children may be present. Collaborating with local communities on education about traffic and pedestrian safety; Using locally sourced materials, whenever possible, to minimize transport distances. Locating associated facilities such as worker camps close to Project area and arranging worker bus transport to minimizing external traffic; Regular maintenance of vehicles and use of manufacturer approved parts to minimize potentially serious accidents caused by equipment malfunction or premature failure; Respect all the provisions indicated in Regulation on Transportation of Hazardous Goods by Road. As per this regulation transportation of hazardous materials can be done through highways and peripheral roads and is not allowed through residential areas. If it is not possible to avoid trans passing residential areas; transportation of hazardous material should be done under the supervision of traffic police. 	ongoing	n.a.	All conditions met	EPC Contractor

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ID.	Source doc.	Mitigation Action/Measure description	Frequency/ Timing	KPI	Target/ Acceptance criteria	Responsi- bilities
TRA-05	IFC – EHS GL – OHS EBRD PR 4: Health and Safety	<p>Ensure that the followings measures for industrial vehicle driving and site traffic are in place:</p> <ul style="list-style-type: none"> Ensuring drivers undergo medical surveillance Ensuring moving equipment with restricted rear visibility is outfitted with audible back-up alarms Establishing rights-of-way, site speed limits, vehicle inspection requirements, operating rules and procedures (e.g. prohibiting operation of forklifts with forks in down position), and control of traffic patterns or direction Restricting the circulation of delivery and private vehicles to defined routes and areas, giving preference to 'one-way' circulation, where appropriate 	ongoing	n.a.	All conditions met	EPC Contractor
Noise Emission Control						
TRA-06	IFC – EHS GL - Env. § 1.7 EBRD PR 4: Health and Safety Turkish Reg. Official Gaz. Num. & Date: 27601, 04/06/2010	<p>Ensure that the following specific noise emission control measures are in place:</p> <ul style="list-style-type: none"> Schedule Project traffic for daylight hours, where possible Schedule large vehicle (trucks and buses) trips as convoys to reduce the number of times per day a disturbance may occur Maintain vehicles in good condition to ensure they are no louder than other, similar vehicles on the roadways Reduce Project traffic routing through community areas wherever possible 	ongoing	n.a.	All conditions met	EPC Contractor
Air Pollution Control						
TRA-07	Official Gaz. Num. & Date: 28837, 30/11/2013 Turkish Reg. Official Gaz. Num. & Date: 27368, 06/10/2009	<p>Ensure that the following specific air pollution control measures are in place:</p> <ul style="list-style-type: none"> Use closed injection systems and low level volatility of diesel fuel to prevent vaporization losses Minimize dust from open area sources by using control measures such as installing enclosures and covers, and increasing the moisture content Comply the provisions indicated in Regulation on Control of Exhaust Gas Emissions for the exhaust gas emissions arising from the engine land vehicles 	ongoing	n.a.	All conditions met	EPC Contractor

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ID.	Source doc.	Mitigation Action/Measure description	Frequency/ Timing	KPI	Target/ Acceptance criteria	Responsi- bilities
Training						
TRA-08	IFC - EHS GL – Community Health and Safety § 3.4	<ul style="list-style-type: none"> • Require licensing of all drivers and improve driving skills • Train and license industrial vehicle operators in the safe operation of specialized vehicles such as forklifts, including safe loading/unloading, load limits 	ongoing	Trained Personnel	90% (i.e. only motivated exceptions allowed)	EPC Contractor

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5.0 MONITORING (MEASUREMENTS)

The following table details the monitoring (measurement) activities identified for traffic management in the Construction phase.

For each monitoring activity and measure/action identified, the table shows:

- the identification code (ID.);
- the reference (or source) documents (i.e. ESA, Turkish standard, permits, IFC Performance Standards and EHS Guidelines, EBRD Performance Requirements and OPIC or other GIIP);
- frequency/timing of the measurement;
- Key Performance Indicator (KPI), and related quantitative target, if the target consist of a regulatory limit this will be indicated;
- the related responsibility for implementing the monitoring activity.

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ID.	Source doc.	Monitoring Action/Measure description	Frequency/Timing	KPI	Target/ Acceptance criteria	Responsibilities
TRA-09	ESA § 9.1.8 ESA Appendix N ESAP – Construction Phase Number 4	Investigation of the incidents and accidents and use of lesson's learned to improve traffic mitigations	Continuous	Number of accidents	N.A.	EPC Contractor
TRA-10	ESA § 9.1.8	Driver education monitoring to ensure it takes place	Monthly	Training Records	N.A.	EPC Contractor for providing monthly records SPV for collecting data
TRA-11	SEP § 7 Grievance Mechanism Procedure	Comments and/or complaints received from ongoing consultations or from grievances to improve traffic mitigations	Monthly	Grievance Records on Project vehicles and drivers	N.A.	EPC Contractor
TRA-12	ESA § 9.1.6 § 9.1.7	Air quality and noise monitoring due to the heavy duty vehicles	Monthly	Emission Reports	Regulatory Limits	EPC Contractor
TRA-13	SEP Grievance Mechanism Procedure	Feedback from local stakeholders regarding to any perceived changes in noise impacts and air quality changes linked to heavy traffic.	Monthly	Grievance Records on Project vehicles	N.A.	EPC Contractor

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6.0 AUDIT AND REVIEW

The correct implementation of this Management Plan is verified through internal and external inspections and audits to be carried out according to the requirements included in "ESMS Manual".

The schedule, the frequency, the scope and objectives of the audit as well as the responsible internal auditors are indicated in the Audit Program that will be developed and updated by SPV HSE Department.

Internal auditing will address:

- the correct implementation of this Management Plan;
- the correct development and implementation of EPC Contractor's Procedure;
- the correct and timely implementation of an auditing and review system by the EPC Contractor;
- each of the point indicated in the tables in section 4 (mitigation actions/measures) and 5 (monitoring/measurements) of this plan.

During the inspections the audit team will address in particular:

- inspections for dust emission should be carried out and prolonged dry or windy conditions;
- inspections for noise emission should be carried out and the inspection frequency should be increased when activities with a high potential to produce noise are being carried;
- interviews with personnel should be also take place in order to ensure that the personnel is qualified and trained;
- main OHS aspects (such as wearing of PPE, presence of firefighting equipment) have to be as well verified.

Evidences and results of the inspection and audit activities are included in the audit reports and in the "Non-Conformity and Preventive/Corrective actions" records.

SPV Management reviews results of inspections and audits and the progress of the Preventive/Corrective actions and takes additional appropriate actions if necessary according to the indications included in "Management Review" Section of the ESMS Manual.

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7.0 REPORTING

Evidences and results of the monitoring (measurements) activities (detailed in section 5 of this plan) have to be described in detail in appropriate monitoring reports. This section of the plan provides instructions and requirements for this reporting activity.

Evidences of the implementation of the mitigation actions/measures (detailed in section 4 of this plan) and related results are collected through inspection and auditing activities as detailed in section 6 “Audit and Review” of this plan; these evidences are described in the audit reports.

Reporting activities for this management plan is mainly related to data on incidents and accidents and on their investigation. These data have to be provided to SPV on a monthly basis.

Grievances records, air and noise emissions and training records are in any case reported to SPV following requirements of other procedures and management plans.

These data together with the results of the inspection and audit activities will be summarized in a Report on a six monthly basis that will be made available to stakeholders which is under the responsibility of SPV. This report constitutes the basis for the monitoring report to be available for the Lenders.