SAĞANAK ENERJİ

SAGANAK ENERJI YATIRIM URETIM VE TICARET A.S.

KANDIRA WIND POWER PLANT

WASTE MANAGEMENT PLAN

DECEMBER 2020

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REVISION HISTORY

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ABBREVIATIONS

AIIB	Asian Infrastructure Investment Bank
EHS	Environmental, Health, and Safety
EIA	Environmental Impact Assessment
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESS	Environmental and Social Standards
EU	European Union
HSE-Q	Health, Safety, and Environment - Quality
IFC	International Finance Corporation
MSDS	Material Safety Data Sheet
MWCR	Medical Waste Control Regulation
OHS	Occupational Health and Safety
Plan or WMP	Waste Management Plan
PPE	Personal Protective Equipment
Project	Kandira Wind Power Plant
PWCR	Packaging Waste Control Regulation
RCWO	Regulation on the Control of Waste Oils
Saganak or Project Owner	Saganak Enerji Yatirim Uretim ve Ticaret A.S.
WPP	Wind Power Plant

1. PURPOSE AND SCOPE

The Waste Management Plan ("the Plan" or "WMP") has been developed in accordance with Saganak Enerji Yatirim Uretim ve Ticaret A.S (hereinafter referred to as "Saganak" or "the Project Owner") policies, with the commitments undertaken by Saganak in the Environmental and Social Action Plan (ESAP) prepared for the Kandira Wind Power Plant (WPP) Project ("the Project") and in accordance with Turkish regulatory framework, with International Finance Corporation (IFC) Performance Standards (PSs), and with IFC General and Sector Specific Environment, Health and Safety (EHS) Guidelines and Asian Infrastructure Investment Bank's (AIIB) Environmental and Social Framework (ESF). Where no national regulation, IFC standard/guideline or AIIB standard applies, the Plan considers the adoption of Good International Industry Practices (GIIP).

1.1 Purpose

The general purpose of the WMP is to describe various measures to avoid adverse impacts of waste generation activities to be performed during the construction and operation of the Project. The plan aims to achieve these by incorporation of local legislation, requirements of IFC, AIIB and international best practice procedures.

Throughout the Project life, different types of wastes and materials will be generated from different sources and activities. The purpose of this Plan is to guide and obtain the acceptable collection, segregation, storage, handling, transportation and disposal of non-hazardous and hazardous wastes generated from the Project activities in a way that minimizes the impacts on human health and environment, including minimization of loss of valuable reusable/recyclable materials.

1.2 Scope

This Plan provides necessary means and measures to achieve goals of the Project. These assessments/measures are applicable to all Project personnel, contractors, subcontractors, visitors and the general public (including any governmental authority or similar site visitors) and covers both construction and operation phases.

This Plan will be updated as and when necessary. The scope of the Plan includes following aspects:

- Legislative requirements and standards
- Roles and responsibilities
- Provisions/measures regarding waste management
- Training of personnel regarding WMP issues
- Monitoring and reporting
- Review and update

2. LEGISLATIVE REQUIREMENTS AND STANDARDS

2.1 Turkish Legal Framework

The Environmental Law (No. 2872), which was published in the Official Gazette No. 18132 dated August 11, 1983 provides the legislative framework for the regulation of industries and their potential impact on the environment. Industrial projects are subject to varying levels of review that begin while projects are in the development phase. Additional regulations apply to facilities once they are in operation.

The Environmental Law authorized the promulgation of a number of regulations. Those that pertain to waste management and the Project have to comply with are described in the following sections.

2.1.1 Waste Management Regulation

The Waste Management Regulation is the implementing legislation aimed at aligning with the EU Waste Framework Directive. The Regulation was published in the Official Gazette No. 29314 dated April 2, 2015.

The Waste Management Regulation provides a single comprehensive framework for waste management. As of April 2015, it repealed and replaced the Regulation on Solid Waste Management and the Regulation on General Principles of Waste Management. As of April 2, 2016, it also repealed and replaced the Regulation on Control of Hazardous Wastes.

- Article 9 of the Regulation stipulates the responsibilities of the waste generators and waste owners, including:
  - Implementation of necessary measures to minimize waste generation;
  - Preparation and submission of waste management plan regarding generated wastes (with prevention and minimization measures);
  - Declaration of annual waste generation via the web-based system of the Ministry of Environment and
  - Urbanization and use of National Waste Transport Form for wastes that require its use (template is provided in Annex 9-A of the Hazardous Waste Control Regulation which is repealed and replaced by Regulation on Waste Management).

2.1.2 Regulation on the Control of Excavation, Construction, and Demolishing Wastes

Regulation on the Control of Excavation, Construction and Demolishing Wastes was published in Official Gazette No. 25406 dated March 18, 2004. Articles 10, 34, 35, 36, 37, 38, 39, 40, 41 and 42 regarding the storage of the wastes were repealed by the Regulation on the Landfilling of Wastes published in Official Gazette No.27533 dated March 26, 2010.

The aim of this regulation is to set the principles and procedures to minimize: excavation, construction and demolition waste at the source of generation, as well as to: collect, temporarily store, transfer, recycle, reuse and dispose waste, in an environmentally sound manner.

In accordance with Article 9 of the Regulation; excavation, construction and demolition generating facilities are obliged to implement waste management in a way that will minimize the adverse effects of waste on the environment and human health. The facilities must acquire the necessary permissions that concern the generation, transportation and storage operations of waste. The facilities are not allowed to dump construction wastes to the sites/locations and facilities other than the permitted ones by the municipal or other authorities.

The regulation also stipulates that the project owner is responsible for having precautions in order to minimize noise impacts, visual impacts and dust emissions during removal of excavation material. The operation Area must also be enclosed. In addition, planning should be done in a way

that the amount of excavated soil is equal to the filling volume. Excavated soils must be utilized within the operation area to the extent possible.

2.1.3 Packaging Waste Control Regulation (PWCR)

PWCR was published in the Official Gazette No. 30283 dated December 27, 2017. The aim of the regulation is to;

- Provide certain environmental criteria, requirements and characteristics for packaging production,
- Prevent direct and indirect disposal of packaging wastes causing environmental damage, and
- Prevent and minimize generation of package waste by means of reuse, recycling and recovery methods.

PWCR states that the packaging wastes should be collected and stored separately from other wastes at source in order to ensure their disposal without causing any environmental damage; to reduce environmental pollution; to benefit from the landfills at maximum levels; and to contribute to the economy.

Packaging waste generating parties located in the boundaries of municipalities that conduct separate collection at source is obliged to deliver the packaging wastes to the responsible municipalities or their contracted and licensed collection/separation entities.

2.1.4 Regulation on the Control of Waste Batteries and Accumulators

Regulation on the Control of Waste Batteries and Accumulators was published in Official Gazette No. 25569 dated August 31, 2004. The purpose of this Regulation is to:

- Arrange legal and technical principles for development of policies and programs for batteries and accumulators from their production to their final disposal,
- Ensure production of batteries and/or accumulators with certain criteria and basic conditions and characteristics in terms of the environment,
- Prevent discharge to the receiving environments,
- Ensure technical and administrative management standards are in place, and
- Establish a collecting system for the recovery and final disposal of used batteries and accumulators.

According to the Regulation, battery and accumulator consumers are obliged to;

- Collect used batteries separately from household wastes,
- Deliver used batteries to the collection points established by municipalities or enterprises that are engaged in the distribution and sales of battery products,
- Deliver the old accumulators to the temporary storage facilities established by the enterprises engaged in the distribution and sale of accumulator products and enterprises operating vehicle maintenance/ repair sites,
- Pay a deposit if a new accumulator is to be purchased when delivering the old one, and
- Ensure impervious ground and other required conditions are met for the temporary storage sites where batteries and accumulators will be stored.

2.1.5 Regulation on the Control of Waste Oils (RCWO)

RCWO was published in the Official Gazette No. 30985 dated December 21, 2019. The purpose of the RCWO is:

- To prevent direct and indirect disposal of waste oils in the environment;
- To ensure temporary storage, transportation and disposal thereof without causing harm to environment and human health;
- To set up necessary technical and administrative standards in management of waste oils;
- To determine the required principles and programs in order to establish temporarily storage, handling and disposal facilities and
- To manage these facilities in an environmental friendly manner.

According to Article 9 of RCWO, waste oil producers are obliged to take required measures to minimize the generation of waste oils, including waste motor oils and residues resulting from processing of waste oils. Waste oil producers must conduct waste oil analyses and declare generated amounts to the Ministry of Environment and Urbanization. Waste oil from different categories should not be mixed with each other or with other hazardous wastes.

Waste oil producers shall comply with the provisions of Waste Management Regulation for disposal. All records including waste oil declaration forms and analyses reports are required to be kept for at least five years. In order to transport waste oils, the regulations that will be determined by Ministry of Environment and Urbanization shall be complied with.

Waste oil is required to be collected in red colored tanks/containers with a label of "Atık Yağ" (“Waste Oil”) on it. The containers are placed in storage with provisions for protection from rain, as well as an impermeable ground (a thickness of at least 25 cm and covered by epoxy, geo-membrane and similar insulation materials).

2.1.6 Waste Vegetable Oils Control Regulation

Published on the Official Gazette No. 29378 dated June 06, 2015; this regulation aims to provide management practices for waste oils from generation to disposal.

According to the Regulation, waste vegetable oils can only be collected by licensed recycle facilities or licensed waste vegetable oil storage facilities. These firms are required to use the national waste register for transport of waste vegetable oils.

2.1.7 Medical Waste Control Regulation (MWCR)

MWCR was published in Official Gazette No. 29959 dated January 25, 2017. The purpose of the MWCR is to establish principles, policies and programs along with legal, administrative and technical fundamentals to prevent direct or indirect discharge of medical waste into receiving environment in any way that could harm the environment or human health. The Regulation also requires that medical waste is collected separately at source and temporarily stored, transported and disposed without causing harm to environment or human health.

2.1.8 Waste Tires Control Regulation

Waste Tires Control Regulation was published in Official Gazette No. 26357 dated November 25, 2006. The regulation aims to;

- Prevention of direct and indirect disposal of waste tires to the receptor platforms, which may harm the environment,
- Installation of tire collection and carriage systems for recycling or disposal, and
- Development of related management plan.

2.1.9 The Communiqué on Recycling of Some Non-Hazardous Wastes

The Communiqué on Recycling of Some Non-Hazardous Wastes entered into force by being published in the Official Gazette dated June 17, 2011 and Official Gazette No. 27967. According to this communiqué, non-hazardous waste producers are responsible for minimizing non-hazardous waste generation and preparing and implementing a waste management plan for the recovery of these wastes.

Waste is required to be stored in leak proof (or similar) containers in an area of impermeable ground and roof. Non-hazardous wastes can be stored temporarily on site for one year until recovery. The producers are also obliged to send their non-hazardous waste to licensed collection and separation or licensed recovery facilities. In addition, it is obligatory to prepare and submit a three-year waste management plan to the Provincial Environment and Urbanization Directorate.

Furthermore, it is mandatory to fill the non-hazardous waste declaration form every year with the information of previous year and submit these forms digitally to the Ministry. It is also stated that the copy of the forms should be kept for five years.

2.1.10 Regulation on Control of Waste Electrical and Electronic Equipment

One of the main objectives of the Regulation on the Control of Waste Electrical and Electronic Equipment, which is published in the Official Gazette dated May 22, 2012 and Official Gazette No. 28300, is to determine the methods and targets for minimizing the generation of electrical and electronic equipment waste through reuse, recycling and recovery.

2.2 International Standards and Guidelines

Applicable IFC and AIIB standards and guideline requirements for waste management within the scope of the Project are provided in the following references:

- IFC Performance Standards on Social and Environmental Sustainability
- IFC General Environmental, Health, and Safety (EHS) Guidelines
- IFC EHS Guidelines: Community Health and Safety
- IFC EHS Guidelines: Construction and Decommissioning
- IFC EHS Guidelines for Wind Energy
- AIIB Environmental and Social Framework
- AIIB Environmental and Social Standards (particularly ESS1)

Aforementioned standards and guidelines set a framework to adopt of best guidance for waste management practices, and address some aspects of project activities which may have an impact beyond the life of the Project and practices across all aspects of project operations with the goal of preventing any waste-related damage and minimizing adverse impacts of waste generation.

3. ROLES AND RESPONSIBILITIES

Managing Director

- Owner and confirmatory of this plan.
- Ensures sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of this Plan.
- Controls and confirms the objectives related with this Plan.

Project Manager

- Develops, implements, circulates and maintains this Plan.
- Provides sufficient resources to implement the requirements of this Plan.

Construction/Operation Manager

- Ensures that relevant activities are carried out in accordance with this management plan and related procedures.
- Reports to the Project Manager issues impacting on the implementation of this Plan.
- Ensures that the contractors are fulfilling their waste related contractual obligations and reports any nonconformity to Project Manager.

Administrative Affairs Manager

- Ensures that all employees are aware of, and appropriately trained on the implementation of this Plan.

HSE-Q Expert

- Ensures implementation of precautions related to waste management objectives.
- Checks whether this Plan fits with the project standards and other agreements or not.
- Operator of this Plan and controls the contractors' application.
- Coordinates related activities of this Plan.
- Gives Plan-related training to employees.
- Performs internal audits and daily inspections and records identified nonconformities.
- After the identification of the deficiencies/nonconformities by contractors in the implementation of this plan, transmits the situation in writing form to the contractors and gives the necessary technical support to take relevant measures.
- Follows the field applications.
- Coordinates monitoring studies and compiles reports.
- Maintains internal records of monitoring studies.
- Collates and maintains records of grievances, and directs it to the Community Liaison Officer if the grievance is external.
- Identifies the necessary actions for environmental grievances.

Community Liaison Officer

- Logs grievances from members of the public with respect issues covered in the scope of this Plan.
- Coordinates communications with the community representatives as presented in this Plan.

Contractors

- Ensures compliance with the Project-specific waste management approach in accordance with the contractual requirements.
- Ensures sufficient and qualified resources are allocated on an ongoing basis to achieve effective implementation of this Plan.
- Ensures the effective implementation of this Plan by issuing its own procedures addressing, detailing and customizing specific actions, measures and monitoring activities under contractors' responsibility.
- Provides relevant monitoring data and monitoring reports to Saganak as required.
- Stipulates Saganak's policies and standards to any subcontractor for duly implementing requirements.

4. WASTE MANAGEMENT

4.1 Waste Management Approach

The Waste Framework Directive (Directive 2008/98/EC) provides a waste hierarchy, which lays down priorities for best overall environmental option in applicable waste legislation and policy. Within this scope, the EU waste hierarchy will also be the hierarchal approach of the Project. The management of wastes will be based on the following, in the order of decreasing preference:

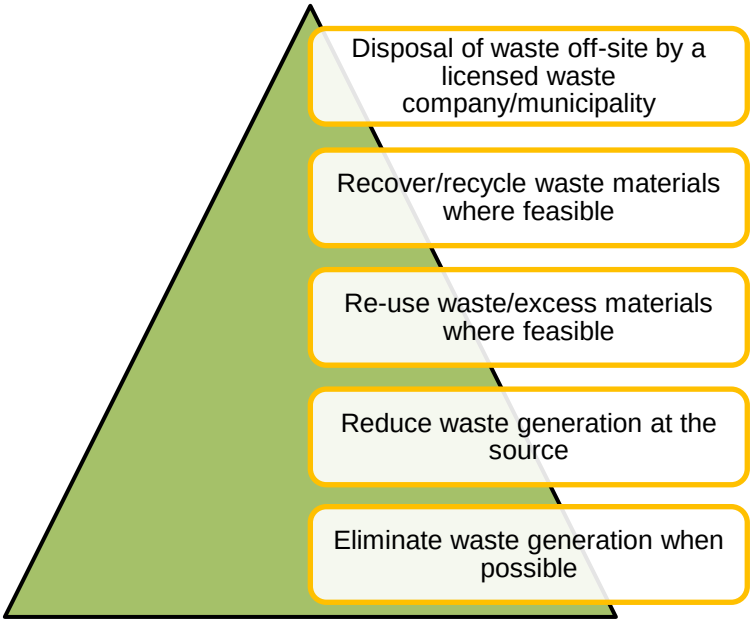

Figure 1. Waste Hierarchy

In order to minimise and appropriately manage the waste generated on site, the following good management practices will be used:

- Reduction of waste generation (through management practices, avoiding or decreasing materials use, etc.) is the primary goal of the Plan.
- Proper housekeeping and operating practices will be applied including inventory control to reduce the amount of waste resulting from materials that are out-of-date, off-specification, contaminated, damaged, or excess to plant needs.
- Non-hazardous wastes will be segregated from hazardous wastes.
- Recycling of wastes will be mandatory throughout all Project activities and related trainings will be provided.
- Recyclable products will be identified and reintroduced into the activity at the site if possible.
- Where vegetation has been removed for construction purposes, the green waste will be recycled onsite wherever practicable, or disposed of offsite.
- Wastes to be sent to licensed recycling/recovery firms will be segregated by type.
- Effort will be made to minimize the quantity of hazardous materials used.
- Personnel that handles hazardous materials and wastes, will be trained for proper handling and management.
- Spills of hazardous materials will be prevented through careful and sensible management of the materials.
- Where possible, non-hazardous alternatives will be used in place of hazardous materials.

- Regular inspections of storage areas will be conducted. If damaged or leaking containers are detected, they will be replaced.
- Preventive maintenance will be performed on equipment to avoid potential spills.
- Waste storage areas will have secondary containment or spill trays.
- Under no circumstances, waste will be disposed and burnt on-site.
- Working areas are to be maintained, kept free of rubbish and cleaned up at the end of each working day.

4.2 Classification of Wastes

The Project activities will lead to the generation of various non-hazardous and hazardous wastes.

4.2.1 Non-Hazardous Wastes

Typical non-hazardous wastes are given below:

- Domestic waste,
- Office waste,
- Recyclable wastes (e.g. paper, glass, metals, wooden waste, trees, tin cans, textile, plastic, cable off cuts etc.),
- Packaging waste,
- Waste tires, and
- Excavation waste.

4.2.2 Hazardous Wastes

Different types of hazardous wastes, that may potentially be generated as a result of the project activities, are given below:

- Waste batteries and accumulators,
- Waste vegetable oil
- Medical waste,
- Waste oil (from maintenance of equipment and vehicles, transformers, etc.),
- Waste paint,
- Other hazardous waste related to operation and maintenance (O&M) activities, and
- Materials that came into contact with hazardous materials (including pesticide containers).

4.3 Implementation

In line with the legislative requirements, an industrial (hazardous and non-hazardous) waste management plan will be prepared and submitted to the Provincial Directorate of Environment and Urbanization. Also, it is mandatory to fill the waste declaration form every year in March with the information of previous year and submit these forms digitally to the Ministry of Environment and Urbanization.

4.3.1 Waste Collection, Segregation and Storage

Wastes will be segregated and temporarily stored in designated secured storage areas separately defined for hazardous and non-hazardous wastes.

Non-Hazardous Wastes

Management of non-hazardous wastes will be as follows:

- Domestic wastes will be collected in special trash bins and temporarily stored onsite in compliance with Waste Management Regulation.
- Recyclable wastes will be separated and stored temporarily onsite in reserved areas.
- Packaging wastes will be collected separately and temporarily stored onsite in reserved areas in compliance with Packaging Waste Control Regulation.
- Suitable waste containers will be provided at the places of waste generation to facilitate safe and environmentally sound temporary storage. All containers will be clearly marked according to contents.

Hazardous Wastes

Management of hazardous wastes will be as follows:

- In accordance with international standards and international common practice, hazardous wastes will be stored in containers that are non-damaged, leak-proof, safe and appropriate. In line with related legislation, a dedicated area with concrete floor will be used for storage.
- All waste containers that are being handled will have clear identification and accurate description of the type of waste. This will provide information to site and external personnel for safe handling and transfer of waste. Any unidentified wastes will be considered as hazardous waste. Waste labels will include information such as waste classification/category, volume of waste, MSDS and required PPEs. Any old labelling on the containers will be removed to avoid confusion.
- Waste will be stored in a manner that prevents the commingling or contact between incompatible wastes, and allows for inspection between containers to monitor leaks or spills.
- Underground storage tanks and underground piping of hazardous waste will be avoided.
- Secondary containment systems will be constructed with materials appropriate for the wastes being contained and adequate to prevent loss to the environment.
- The hazardous waste containers will be checked regularly, in order to determine whether they are damaged or any spillage has occurred.
- Hazardous waste containers will be kept closed away from sunlight, wind and rain, and wastes will be stored in a way that they will not have chemical reactions.
- Adequate ventilation will be provided where volatile wastes are stored.
- Vehicles and construction machinery will be used during the land preparation, construction and closure phases of the Project. Maintenance (e.g. oil change, battery change, etc.) of machinery and equipment is planned to be performed outside of the Project Area, at qualified service providers. In case it is inevitable to perform oil change, battery change, tire change, etc. on site, reserved areas for this work (with appropriate drainage) will be used. An impermeable cover will be laid under vehicles to prevent soil contamination and this activity will be conducted away from the water resources. When any oil/fuel/lubricant spill or leakage occurs at site, the contamination will be controlled by using absorbents and the contaminated soil (if any) will be stripped to the adequate depth and stored also as hazardous waste.
- Absorbent material will be kept in all of the vehicles used for transportation against any leakage or spill. Information will be given to workers on the use and disposal of materials. Filters or materials saturated with petroleum products will be drained into an appropriate container to remove any free product prior to disposal.
- Waste oils will be temporarily stored, handled and disposed in separate containers, according to the categories referred to in the Waste Oil Control Regulation. Waste oil will be collected inside the containers placed on an impermeable surface. Different containers will be used for waste oils of different categories. Waste oil temporary storage containers will have “Waste Oil” sign on.
- Waste vegetable oils will be collected in special containers temporarily.

- Discharge of the waste oils to receiving environments or lavatories/sinks will not be allowed.
- Waste batteries and accumulators will be collected and stored separately in compliance with Regulation on the Control of Waste Batteries and Accumulators.
- Project vehicle maintenance will be conducted off-site. However, in case tires of vehicles and the construction machines need to be changed, the changed tires will be kept in special reserved places in line with Waste Tires Control Regulation.
- Medical wastes will be collected separately from other wastes in compliance with Medical Waste Control Regulation.
- The Project activities do not require use of explosives. However, if required, waste explosives will be stored in their original type of container, but marked as explosive waste and will be transported by licensed firms.

Excavation, Construction, and Demolition Wastes

The excavation material will be reused as much as possible on site. The following practices will be applied for the management of excess excavated material and other construction and demolition wastes:

- Excess excavation material and construction and demolition wastes shall not be disposed of on site.
- Only small branches, leaves, etc. (parts of cut trees and shrubs not collected by the relevant forestry authorities) will be left on site since these will contribute to the development of local vegetation through fertilization of the soil.
- Any waste concrete and wash-down from concrete supply trucks will be disposed of into an excavated small pit, where its impermeability is ensured through silt and geomembrane usage, such that the concrete can be removed from the pit once dry.
- The areas used for the temporary storage of excavation wastes will be brought to their initial state as soon as the excavation/construction activities in each related area are completed.
- Top soil will be stripped and stored separately from excavation material.

4.3.2 Waste Transportation and Disposal

Non-Hazardous Waste

The following management controls will be in place for transport and recycling, recovery and disposal of non-hazardous wastes:

- A protocol will be signed with the related municipality for transfer of domestic wastes to the sanitary landfill.
- Agreements will be signed with licensed firms for transport of segregated recyclable and packaging wastes.
- The portion of excavation waste that cannot be reused on-site will be transported to excavation, construction and demolition disposal areas approved by the related municipality.
- Agreements between Saganak and licensed waste facilities will be annexed to this WMP.

Hazardous Wastes

The following management controls will be in place for transport and reuse, recovery, recycling and disposal of hazardous wastes:

- Hazardous wastes will be transported off site when the storage on site are nears maximum storage capacity levels. Hazardous waste will be securely packed and

labelled prior to removal from site to ensure the waste can be transported safely to the approved disposal site without risk to those handling the waste or to the environment.

- Separately collected waste batteries and accumulators will be delivered to the collection points established by enterprises engaged in the recovery, distribution and sales of battery products; or by municipalities.
- Waste tires will be delivered to the licensed transportation, recycling or reuse (as fuel) companies.
- Medical wastes will be sent to a nearby healthcare facility or a medical waste disposal firm, under supervision of the workplace doctor.
- Waste oils will be transported by licensed transporters to the licensed processing and disposal facilities. National Transportation Form will be filled prior to transportation and waste oil declaration form will be submitted to relevant authorities annually.
- Waste vegetable oils collected in special containers will be sent to licensed companies for reuse/ recovery.
- Licensed disposal facilities will be used for transfer and disposal of other hazardous wastes.
- Agreements between Saganak and licensed waste facilities will be annexed to this WMP.

5. TRAINING

Saganak will provide the necessary funds and scheduling time to ensure effective waste management training is provided. This commitment will include paid work time for training and training in the language that the workers understand. Both management and employees will be involved in developing the program. To most effectively carry out their responsibilities, all personnel must understand (1) their role in the program, (2) the hazards and potential hazards that need to be prevented or controlled, and (3) the ways to protect themselves and others. Goals will be achieved by:

- Educating everyone on the natural and system consequences of their actions;
- Educating all managers, supervisors, employees, contractors and visitors on their waste management system responsibilities;
- Educating all employees and contractors about the specific hazards and control measures in their workplace;
- Training all employees and contractors on hazard identification, analysis, reporting and control procedures; and
- Training all employees, contractors and visitors on safe work procedures and practices.

Training program will focus on waste management concerns that determine the best way to deal with a particular hazard. When a hazard is identified, it shall be removed entirely. If that is not feasible, workers shall be trained to protect themselves and the community, if necessary, against the remaining hazard.

The training program at least includes the following subjects:

- WMP measures and monitoring activities
- Waste hierarchy
- Waste segregation
- Spill prevention and response
- Material handling and housekeeping
- Cement and concrete
- Storage of wastes

All Saganak employees and employees' of contractors are obliged to attend trainings on waste management and understand the Project's approach on waste management. These trainings will be conducted by HSE-Q Expert and the attendance sheets will be filled and submitted to the Administrative Affairs Manager for employees' personal files. HSE-Q Expert shall ensure that all employees are trained on at least the above-given subjects.

In case of an incident, accident or grievance; HSE- Q Expert has responsibility to increase the frequency and to review and update the content of waste management trainings.

6. MONITORING AND REPORTING

The waste types, collected amount of each type and waste classifications, will be recorded on a monthly basis. Records for generated waste from time of generation to final destination will be maintained. A sample waste log form for this purpose is provided in Appendix A. Annual waste declaration will be done through online waste declaration system (MoTAT).

Daily inspections regarding on-site management of wastes will be conducted during the construction and operation phase by HSE-Q Expert. A sample checklist for subjects to be covered during inspections is provided in Appendix B. In addition to these inspections, internal audits will be conducted quarterly during the construction phase and annually during the operation phase. Based on monitoring and audit results, corrective and/or enhancing actions will be designed and implemented. Performance of these actions will also be monitored and reported. Based on the monitoring results, necessary corrective and preventive actions will be identified and required changes will be reflected to the Plan. Training program will also be updated accordingly.

In addition to internal monitoring, the experts from related institutions could monitor and audit these activities. The timing and frequency of these audits would be determined by the relevant institutions. Reports will be produced as a result of the monitoring programs for each issue regarding waste management.

Evidence and results of the monitoring (measurements) activities have to be described in detail in monitoring reports.

The EHS performance report that will be prepared by the HSE-Q Expert in a six-monthly basis will include a chapter dedicated for waste management actions. In this report, HSE-Q Expert will provide the summary of waste records, number of nonconformities identified, resolved and not yet resolved, and indicate good practices, if any.

7. REVIEW AND UPDATE

Saganak's HSE-Q Expert determines the review and update needs of this Plan. In general, the Plan should be reviewed according to the results obtained from site inspections and conveyed grievances, and reviewed and updated accordingly, if necessary. The Plan shall be reviewed and updated after changes in related legislative and international standards. The contractors' HSE-Q staff is responsible to put effort in the review and update process of the Plan.

Appendix A - Waste Log Form

Month: Waste Log Form No:

No	Date	Type (Hazardous/Non-Hazardous)	Sub-type	Waste (ton or m^3)	Transporter	Disposer	Disposal Method
1							
2							
3							
4							
5							
6							
7							
8							
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20							

Appendix B – Sample Checklist

Inspection Date:

Inspection Location:

Control Measure	Compliance (Yes/No)	Comment
Are all waste streams being properly separated and labelled in to the following categories? - Hazardous Waste - Non-hazardous waste		
Is the site waste inventory current and up to date?		
Are hazardous and non- hazardous wastes being stored at separate locations?		
Has a map been produced showing the correct waste storage locations which are visible to all workers		
Are all waste storage containers appropriately labelled to prevent cross contamination of waste materials?		
Are all waste labels complete with the appropriate information to include: - Waste stream (Hazardous, non-hazardous, etc.) - Type of waste (solid, liquid or sludge) - Amount of waste - Known environmental, health and safety hazards (e.g. MSDS forms) - Personal protection equipment (PPE) required		
Are licenses of companies contracted for waste transport and waste disposal valid and up-to-date?		
Are copies of National Waste Transport Forms kept as part of monthly waste log forms?		