T.C. ULAŞTIRMA VE ALTYAPI BAKANLIĞI

EPC Contractor

REC ULUSLARARASI

PROJECT

NORTHERN MARMARA MOTORWAY SECTION 8 PPP PROJECT

REV	DATE	REMARKS	PREPARED BY	CHECKED BY	AUTHORİZED BY
0	*06.04.2022*	*FIRST PUBLICATION of the Procedure in line with the holding / project standards*	*Seda BAKAN*	*Muzaffer KOÇOĞLU*	*Selim SÖNMEZ*

STATUS

FOR INFORMATION	☐
FOR REVIEW	☐
FOR APPROVAL	☒
APPLICABLE TO DESIGN	☐
APPLICABLE FOR PURCHASING	☐
APPLICABLE TO CONSTRUCTION	☐
FINAL	☐

PUBLICATION OWNER

REC ULUSLARARASI

SIGNATURE	DATE

DOCUMENT NO
REC-İSG-KMO-PL-07

Document Title
Traffic Management Plan

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ABBREVIATIONS AND ACRONYMS

CESMP	Construction Environmental and Social Management Plan
CLO	Community Liaison Officer
EBRD	European Bank for Reconstruction and Development
EPA	Environmental Protection Agency
EPC	Engineering, Procurement and Construction
EPRP	Emergency Preparedness and Response Plan
ESHS	Environmental, Social, Health and Safety
ESIA	Environmental and Social Impact Assessment
ESMMP	Environmental and Social Management and Monitoring Plan
ESMS	Environmental and Social Management System
GBVH	Gender-Based Violence and Harassment
GIIP	Good International Industry Practice
HSE	Health, Safety and Environment
IFC	International Finance Corporation
ISO	International Organization for Standardization
KPIs	Key Performance Indicators
NMM	Northern Marmara Motorway
OHS	Occupational Health and Safety
PPE	Personal Protective Equipment
PS	Performance Standards
PUWER	Provision and Use of Work Equipment Regulation
REC	REC International
SDSs	Safety Data Sheets
SPV	Special Purpose Vehicle (Nakkaş Otoyol A.Ş.)
TDS	Total Dissolved Solids
TSS	Total Suspended Solids
UKOME	Transportation Coordination Center
WHO	World Health Organization

1. PURPOSE

This Traffic Management Plan was prepared by EPC Contractor "REC International" (hereafter called "REC") which is applicable to the construction phase of the Project.

The ultimate responsibility for its implementation resides with REC, and REC's sub-contractors & suppliers will be required to demonstrate compliance of their activities against this plan. This plan is intended to be 'living document' that can be refined and modified as situations change.

The Special Purpose Vehicle (SPV)-Nakkaş Otoyol A.Ş. will have the main role in monitoring of E&S performance of all project participants during implementation of works and services.

The purpose of this plan is to ensure the safe management and control of trucks, cars and earth moving machines including all vehicles to be used for transportation of humans, materials and equipment during the execution of construction activities carried out on the Northern Marmara Motorway Section 8 PPP Project (NMM -Nakkaş -Başakşehir Motorway).

The Plan applies to:

- Access roads to construction sites, manufacturing sites, active work fronts, quarries, borrow pits and dump sites, camp sites, etc.
- Delivery of machinery, equipment and materials,
- Movement of machinery and equipment within the manufacturing sites such as beam production facilities, batching plants and asphalt plants,
- Interaction with third party pedestrians and vehicle traffic

2. SCOPE

- This Plan applies to people (employees, interns, etc.) involved in the Northern Marmara Motorway Section 8 PPP Project (NMM -Nakkaş -Başakşehir Motorway), all operating consultants, consultants, intermediary persons and companies, service providers and subcontractors.
- The content of this document has been developed to determine the minimum requirements for the Project; It has been developed according to the legal regulations of the working area, employer expectations and international standards.

3. REFERENCES

- Highway Traffic Law
- General Guide for Workplace Traffic Management – SafeWork Australia

- Safe Use of Vehicles on Construction Sites / Safe Use of Construction Equipment on Construction Sites – Health and Safety Executive
- Workplace Transport Safety, A Brief Guide / Summary Guide – Health and Safety Executive
- Provision and Use of Work Equipment Regulations (PUWER) ACOP / Implementation Guide – Health and Safety Executive

4. LINKS TO OTHER PLANS AND PROCEDURES

This Plan is supported by the other plans/procedures of the Project-specific ESMS. Those of particular relevance to this procedure are as follows:

- Construction E&S Management Plan (CESMP)
- REC-İSG-ÇYS-KMO-PL-01 H&S Plan
- REC-İSG-ÇYS-KMO-PL-06 Emergency Preparedness and Response Plan
- REC-İSG-ÇYS-KMO-PL-13 Community Health, Safety, and Security Plan
- REC-İSG-ÇYS-KMO-PR-07 HSE Discipline Procedure
- REC-İSG-KMO-PR-04 Hazard and Risk Management Procedure
- REC-İSG-ÇYS-PR-24 Machinery and Equipment Procedure
- REC-İSG-ÇYS-KMO-PR-14 Personal Protective Equipment Procedure
- Subcontractor HSE Assessment Procedure
- REC-ÇYS-KMO-PL-05 Noise and Vibration Management Plan
- REC-İSG-ÇYS-KMO-PR-05 HSE Training Procedure

5. ROLES AND RESPONSIBILITIES

REC Project Manager

The REC Project Manager has the overall responsibility for the implementation of the Project activities stated in this plan. They will be suitably competent and have a strong understanding of construction best practice aligned with national law and applicable Lender requirements.

The REC Project Manager is accountable for overall ESHS (Environmental, Social, Health and Safety) performance and making the human and financial resources available to ensure compliance with Project ESHS requirements.

Further responsibilities of REC Project Manager also include:

- Providing the necessary resources for the development, implementation and monitoring of this Traffic Management Plan and associated strategies
- Ensuring that employees or subcontractors have the required skills and training to conduct worksite traffic management activities.
- Ensuring any incidents are recorded and closed out and appropriate actions taken with minimal time frames
- Ensuring that all identified hazards are controlled
- Ensuring this Traffic Management Plan is complied with.
- Complying with the REC's Health and Safety Policies.
- Ensuring suitable communication and consultation with affected stakeholders is maintained at all times. Complying with all necessary requirements regarding the movement of traffic within the worksite and on adjoining roads.
- Liaising with government institutions on topics relevant to traffic management involving this Project.

REC E&S and H&S Managers

E&S and H&S Managers are responsible for the following:

- Monitoring and assurance of the EPC Contractor’s subcontractors ESHS system performance and requirements of the Project.
- Developing CESMP and other ESHS plans and procedures and assuring that Project requirements are considered.
- Reviewing subcontractors and suppliers ESHS documentation to ensure that they are aligned with Project ESHS requirements.
- Monitoring performance through Key Performance Indicators (KPIs), reports, audits, and meetings.
- Reporting ESHS performance to REC Project management, SPV ESHS Management, and other related parties.
- Establishing Emergency Response Teams (ERT) and defining roles and responsibilities of ERT members.
- Ensuring that all ESHS training needs are identified, provided and recorded.
- Disclosing relevant ESHS information to Project staff and the public and coordinating activities for raising awareness.

- Implementing this traffic management plan.
- Document and investigate incidents or near-miss incidents relating to the worksite traffic management processes.
- Regularly inspect the workplace, monitoring working and traffic conditions and taking appropriate action where necessary.
- To rectify safety matters raised by workers within their area of responsibility.
- Ensure this Worksite Traffic Management Plan is complied with.

Subcontractors

Subcontractors are responsible for the following:

- To comply with the rules specified in this document while carrying out its activities,
- To correct the nonconformities within the scope of this document, as soon as possible, as indicated to them by the Project Management or Project HS Unit,
- Fulfilling the obligations related to all motor vehicles and construction machinery owned by them or used within the scope of the project by leasing method,
- Making, recording, and sharing the controls with the Project HSE Unit within the requested period in accordance with the REC-İSG-ÇYS-PR-20 Construction Machinery and Equipment Procedure,
- Regulating the access routes to the work sites and the vehicle and machine traffic within the work areas within the framework specified in this procedure.
- Access roads to the work sites and any need for changes to be made within the work site are subject to the approval and permission of the Project Management.

Traffic Safety Officer

The responsibilities of the Traffic Safety Officer are as follows:

- To lead the preparation of the Traffic Management Plan according to the project conditions, to submit the plan to the approval of the Project / Operations Manager. The Traffic Management Plan should focus on small scale operations, providing specific traffic management indications for single project locations, e.g., camp sites, quarries, manufacturing sites, active worksites, etc.
- Leading risk assessment studies on Traffic Management,
- To ensure that the flagmen, operators and drivers working in the project are familiar with the requirements of this Plan and to provide them with training on traffic safety practices, to take a priority role in creating and updating the training content,

- To carry out planning activities that will reduce traffic loads by meeting with the responsible of activities that will cause vehicle - equipment traffic in the project at regular intervals,
- To ensure periodic maintenance, inspection and control of moving vehicles and equipment,
- Inspecting the current status of vehicles - equipment and pedestrian roads in the field on a daily basis, ensuring that unsafe situations are eliminated,
- To analyze the necessity of traffic signs, signalization and warnings in the field, to guide the logistics units about the necessary standards in the supply of these elements, to ensure that regular controls and inspections are carried out after their installation,
- Working together with the Machinery and Equipment Supervisor in making the competency assessments of the flaggers, recording these assessments, carrying out the management and administration of the flagmen and contributing to their professional development.

Flagmen

The responsibilities of the flagmen are as follows:

- Giving signals to the driver-operator to ensure safe movement of vehicle-equipment in work areas,
- Making directions to prevent drivers and operators from hitting people and other equipment,
- Supervising the operation of vehicles and equipment in the field and ensuring their safe parking,
- Guiding vehicles and equipment to reverse maneuver when necessary,
- Guiding in order to reduce pedestrian and vehicle interaction in areas where vehicles and equipment are busy,
- To act in line with the direction and administration of the Traffic Safety Officer,
- To use and maintain the PPE provided to him, indicating that he is the Flagman.
- The duties and responsibilities of the employees who will serve as the flagman are notified against signature.
- To regulate construction site traffic and third-party vehicle traffic at points where third-party vehicle traffic inevitably intersects.

Drivers and Operators

The responsibilities of drivers and operators are as follows:

- Having knowledge of the traffic rules in and out of the field (areas in interaction with third parties),
- To ensure that the vehicle or equipment used is maintained and in good condition,
- Wearing the seat belt while using the vehicle or equipment, ensuring that all other p passengers wear seat belts, not moving until the other passengers are wearing their seat belts,
- To comply with the speed limits determined on and off the field,
- Complying with all traffic signs, signals and mandatory directions on and off the field,
- To use the vehicle or equipment with its headlights on, motion signals and alarms (reverse gear alarm, beacon lamp and alarms that work with the movement of pallets in tracked work machines),
- Vehicle – not to disable the safety equipment of the equipment,
- Not reversing where the flagman is not present,
- To comply with the flags' signs and warnings,
- Parking in designated places only.
- Not to close or block in-field transition routes unplanned,
- Not to carry any unauthorized person in the vehicle or equipment,
- To make pre-use checks before using all vehicles and equipment,
- To use all PPE required by the project when going out of the cabin in the field,
- Not smoking in vehicle or equipment cabins,
- Keeping vehicle and equipment cabins clean and tidy,
- Not to consume food or drink in vehicle and equipment cabins,
- Not using materials that will reduce the field of view on vehicle and equipment cabin windows (curtains, paper, cardboard, etc.)
- Not to leave the cabin while the vehicle or equipment is in operation,
- Stopping the engine of the vehicle or equipment when not in use,
- Not to use mobile phones and other communication tools while the vehicle or equipment is in operation or in operation,

- Not using headphones while driving a vehicle or equipment or while operating,
- Stopping the operation as soon as eye contact with the flagger is lost,
- Not to move unless the transported load is safely loaded,
- Not to smoke during refueling and to obey the warnings of the refueling officer,
- To report all accidents and incidents.

Employees

The responsibilities of the employees (non-drivers) are as follows:

- Using the routes allocated only for pedestrians in the field,
- Not to enter vehicle-equipment roads without traffic sign, signal or flagman supervision,
- To comply with the directions of the flagmen.
- To comply with the provisions for pedestrians included in this Traffic Management Plan and all the rules defined in this document,
- Stopping work in case of a dangerous and life-threatening situation,
- To report all dangerous situations and behaviors,
- Using all mandatory PPE.

6. GENERAL RULES AND IMPLEMENTATION

6.1. General Rules

Following general rules for Construction Traffic are listed as below:

- All subcontractors and other Project road users will be required to comply with this plan,
- School bus drivers will be informed about the busiest hours of project activities,
- Necessary training and awareness training will be given to heavy vehicle drivers,
- A follow-up mechanism will be established to continuously monitor and inspect the speed control of heavy vehicles, the routes they use, and the transportation routes,
- Regulations and laws regarding the transportation of materials and loads by heavy vehicles will be implemented and additional measures will be taken in accordance with national legislation, if required. Tarpaulin, closed transport, load limits, maintenance and measurements of vehicles will be checked, environmental and social security measures will be taken,
- The grievance mechanism will be used effectively, and traffic related complaints will be recorded, evaluated, resolved and managed.

- Before starting the motorway construction, traffic regulation road crossing works will be carried out in consultation with the relevant stakeholders (i.e. traffic authorities, local authorities etc.).
- Safe work zones will be established to physically separate workers on foot from the traffic;
- The timing for works implementation (Traffic management) will be optimized to minimize traffic delays due to rehabilitation, widening or maintenance work zones on existing road sections. Activities, e.g., maintenance, that affect traffic will, if possible, be conducted during low traffic hours in order to avoid affecting local traffic.
- For the construction works to be conducted at locations where traffic exists, the Contractor will establish safe work zones by taking relevant measures (closure of roads, diversion of traffic, use of protective barriers, cones, warning lights, etc.) in consultation with the pertinent authorities (police, traffic authorities, local authorities, etc).
- Weather forecasts will be monitored to provide advance warning of extreme weather to drivers and schedule the work accordingly.
- Temporary traffic control devices, such as signage, warning devices, paddles, and concrete barriers will be set up where required in a consistent manner throughout the work zone to provide passing motorists with advanced warning of upcoming work zones;
- Traffic control workers will be trained in topics such as traffic flow, work zone setup, and proper placement of channelizing devices.
- All workers will wear high-visibility safety apparel.
- Speed Limits of vehicles related to the Project must be compliant with the limits established in Section 6.6 “Speed Limits”.
- Speed limits (50 km/h) will be implemented for trucks travelling to and from construction sites (within built-up areas and on village roads of poor condition: 30 km/h). For monitoring purposes, a truck speed report will be regularly required to the companies responsible for the transportation.
- Slow driving rules in villages (e.g., max. speed 30km/h) will be implemented, particularly near sensitive use areas which will be identified (at least one month) prior to start of construction related activities;
- Project traffic routing through community areas will be reduced wherever possible. Optimum traffic routes will be identified and communicated to the drivers (both heavy and light vehicle drivers)

- The motorway alignment will be used for transportation whenever possible.
- The noise will be restricted to be perceived at nearby buildings from construction to 70 dB Leq during the evening and 65 dB Leq at night as far as practicable for short-term activities lasting not more than 10 days. Noise monitoring will follow the provisions set in Noise and Vibration Management Plan.
- Noise levels will be managed and monitored according to the Noise and Vibration Management Plan (REC-ÇYS-KMO-PL-12)
- Noise levels from longer term construction activities (longer than 10 days) will be restricted to 55 dB LAeq during the evening, and 50 dB LAeq at night as far as is practicable, or to other standards that have been agreed with the local authority.

Mitigation Measures for the Impact on the Local Road Network:

- Ongoing stakeholder engagement will include consultation with authorities, local communities and any other relevant stakeholders, as per the SEP and additional stakeholders are to be identified in the course of the project as necessary, with regard to Traffic Management. Any grievances received from stakeholders will be managed in accordance with the Grievance Mechanism as detailed in the Project SEP
- Roads will be assessed to ensure suitability for heavy and large vehicles prior to use by Project vehicles
- Engagement will be made with local authorities on the issue of traffic movement during the construction phase whenever necessary but at least once a week.
- Residents in nearby communities will be informed about the transport routes to be used. Signage will be erected in the weeks prior to any works commencing along and on adjacent roads to the Project area, notifying the public of the construction activity and related transportation to take place and the timing thereof, including contact details of REC;
- In cases where transit from existing settlements is inevitable, REC will take all necessary precautions (speed limits, traffic signs, driver trainings) to prevent safety risks that concern the public, and will contact the public representatives to plan the traffic by taking into account the daily life of the people and by appropriate means such as brochures, notices, signs, etc, it will inform the public about the construction program, activities to be carried out and safety measures taken.
- Supervision and escort for heavy machinery (which requires escort and permit in line with national Legislation) will be provided.
- Supervision for vehicles carrying construction materials and equipment that pass over public or private roads and motorway crossings will be provided.

- Project related traffic will be regulated during certain dates and times where local community will require to commute (to/from schools, commercial areas etc.) or take on any agricultural activity (animal grazing or other farming activities etc.).
- In order to minimize off-site traffic, the Contractor will give priority to the determination of excavation material storage areas within the expropriation corridor of the motorway and the selection of quarries and borrow quarries with the least possible transport distance.
- The contractor will evaluate and approve subcontracted site locations considering the potential impacts of site-related traffic on nearby communities.
- The contractor will clearly identify construction zones with appropriate visual means such as reflective barriers and flashing signs.
- Temporary access to private property or appropriate accessing alternatives will be determined in consultation with the land owners or users.
- Local authorities and communities will be provided with detailed information on the planned closure of roads at least 2 week in advance by the communication channels defined in the SEP such per email, signage boards, traditional media (newspapers, radio), etc. as applicable. Routes envisaged for construction traffic and critical places (including sensitive receptors such as hospitals, schools) will be determined and agreed upon in consultation with relevant authorities and, if necessary, local people.
- Methods for every road crossing will be determined and agreed upon with authorities prior to taking any action. All methods and construction techniques proposed by the Contractor will aim to minimize possible disruptions caused by road crossings.
- Contractor will ensure that road safety training will be provided to employees.
- The schools nearby the Project site will be informed about the peak movements of the vehicles and vehicle traffic will be avoided during hours when children are traveling to and from school.
- Heavy machinery and vehicles utilized in transportation activities (including transportation of personnel) will be used by qualified and licensed drivers.
- All drivers will know and comply with all traffic signs, will be made aware of hotspots of intense traffic that are expected along the route and are trained properly for on and off-road conditions.
- Managing and monitoring of working and resting hours drivers will be undertaken according to Turkey Legislation.

- Monitoring security arrangements for loads, vehicles and drivers will be undertaken according to Turkey Legislation.
- All project work sites, Project Facilities, temporary roads, and traffic management works will be signposted in line Turkey Legislation and as required by the Traffic Management Plan TMP).
- Night drive/transportation will be limited as much as possible to reduce the risk of accidents and obtaining necessary permits shall night transportation be required.
- Compensating damages caused by an accident due to project activities will be undertaken according to national legislative requirements and the Grievance Mechanism defined in the Stakeholder Engagement Plan (SEP) of the Project.
- A Grievance Mechanism Procedure will be set up for communities and individuals to formally communicate their concerns, complaints and grievances and facilitate resolutions that are mutually acceptable by the parties.
- The routes of the roads that will be used and the peak hours of the usage of the roads will be shared with village heads and management of the schools by the communication channels defined in the SEP such as email, as applicable.
- The CLOs of the contractors will arrange awareness training for schools, to be given by the HS Manager or Officer, if there is a school located on the route of the roads that will be used.
- Installation of barriers (e.g. fencing,) to prevent pedestrian access to the Project construction area except at designated crossing points.
- Landfill irrigation system will be applied to prevent dust formation on the road. Regular and frequent irrigation will be applied especially in the dry period for dust reduction. Where there are sensitive products, dust screening measures will be applied.
- The grievance mechanism will be strengthened and operated along the entire route, all complaints will be recorded and resolved in accordance with the GRM procedure.
- In case of complaints, additional measurements will be made and the results will be shared with the complainant.
- Road improvement/rehabilitation will be implemented when necessary.
- The level crossings used for livestock breeding and for passing to pasture areas will be determined and signposted, indicating an approaching speed limit of 10 km/h and installing a Stop signal at the crossing point.
- During the construction period, a passageway will be left at certain intervals for animal passages,

- It will be determined in consultation with the villagers so that the animal crossings do not cause difficulties in their livelihoods and do not lengthen the roads,
- Where necessary, safe and functional passageways or underpasses etc. will be constructed.

Mitigation Measures for the Impact on the Community Health and Safety:

- In terms of children's health, taking dust-preventing screening measures to prevent dust towards schools, in order to prevent the schools from being affected by dust during the construction process and the security problems that may arise from the construction activities, the existing firewalls and wires should be developed and strengthened with more functional and protective measures.
- Improvement of the firewall so that students are not exposed to a risk from construction. Fire walls should extend through the roof and terminate close to the base of the wall. They should be finished off on the top with a sheet metal cap to protect it against harsh weather conditions. The appointed subcontractor in charge of the firewall's improvement should ensure and provide documentation that the firewalls can withstand a standard fire resistance test (fire-resistance rating).
- Continuous monitoring and reporting of social and environmental impacts around schools, by means of signage boards and email and other appropriate communication channel as defined in the SEP.
- Underpasses and overpasses that are suitable for public use and that can pass at important points should be planned and implemented,
- The security measures and lighting of the passages should be taken at a sufficient level and they should be accessible; it will be built in accordance with the use of children, elderly, disabled and parents with children,
- The construction activities on the existing roads will only start after the relevant permits are obtained, and signage, barrier, fence, lighting, etc. will be completed in cooperation with the relevant authorities. All necessary precautions will be taken. The contractor will clearly identify construction zones with appropriate visual means such as reflective barriers and flashing signs. Routes envisaged for construction traffic and critical places (including sensitive receptors such as hospitals, schools) will be determined and agreed upon in consultation with relevant authorities and, if necessary, local people. Construction vehicles will only operate within these regions and routes.
- In order to minimize off-site traffic, the Contractor will give priority to the determination of excavation material storage areas within the expropriation corridor of the motorway

and the selection of quarries and borrow quarries with the least possible transport distance.

- The contractor will evaluate and approve subcontracted site locations considering the potential impacts of site-related traffic on nearby communities.
- A follow-up mechanism will be established for the speed control of heavy vehicles, the routes they use and the continuous monitoring and inspection of transportation routes. Truck activity reports based on GPS technology will be periodically requested from the contractors.
- Considering the pedestrian traffic, the construction will continue without closing the pedestrian crossing routes or by providing alternative crossings,
- Heavy vehicle offsite traffic will be planned in such a way that it does not coincide with the entrance and exit times of the schools. The Contractor or the specific subcontractor will be responsible for this, as applicable.
- School bus drivers will be informed about the busiest hours of project activities,
- Necessary training and awareness training will be given to heavy vehicle drivers,
- Pits, splits and deteriorations that may pose danger will be maintained immediately. Road improvement works to prevent risks arising from weather conditions will be carried out.
- Considering that the traffic from villages to districts will increase on the days when the district market is established, heavy vehicle traffic will be kept under control in order to prevent risks these days.
- Duration of traffic density and dense points etc information will be given to the local people by mukhtars or by holding safety meetings.
- A follow-up mechanism will be established for the speed control of heavy vehicles, the routes they use and the continuous monitoring and inspection of transportation routes,
- The grievance mechanism will be used to ensure traffic-related complaints are recorded, evaluated, resolved and managed. Steps and time scales for managing grievances will follow the Grievance Mechanism provisions included in the Stakeholder Engagement Plan (SEP).
- A shuttle bus will transport the project workers from the workers camp to the project construction site.

6.2. Risk Management

Considering the traffic management parameters in the project, the risk management tool is determined and implemented according to the REC-İSG-ÇYS-KMO-PR-04 Hazard and Risk Management Procedure. Within the risk management tools determined for the activities that will create traffic in the project, how the hazards and risks arising from the field traffic will be managed are explained in detail.

Risk Assessment

- In the risk assessment to be made according to the risk management tool to be determined in accordance with the REC-İSG-ÇYS-KMO-PR-04 Hazard and Risk Management Procedure, all elements and good practices that may result in undesirable events, including but not limited to the ones stated below takes into account. These applications are:
- Preferring the hours when the traffic is not very busy when planning high-risk activities,
- The location of the work carried out in the field, its interaction with vehicles or pedestrians,
- Hazards specified in the traffic management plan prepared specifically for the site,

Control of Risks

- Separation of routes with appropriate traffic controls to minimize pedestrian and vehicle interaction,
- Suitable marking, signaling and using barriers to reduce vehicle speed and control pedestrian movements,
- Separation of vehicle and pedestrian roads with physical barriers,
- Providing safe access for pedestrians and people with disabilities,
- Improvement of road geometry, terrain, vegetation and other conditions that may affect visibility and visibility.
- Recording traffic management regulations for the site,
- Regular control and inspection of field traffic routes and all traffic control devices
- In cases where it is not possible to completely eliminate the risk as a result of the risk assessment, one or more of the following options are considered in order to minimize the risks:
- Ensuring the job is done with safer equipment (Ex: Replacing forklifts with other load handling equipment such as walker stackers or pallet trucks),

- Avoiding contact between hazards and people (e.g. creating a delivery area away from other pedestrians or their activities),
- Using engineering controls (Ex: Speed limiters on forklifts, presence detection devices, breakers, etc.)
- If a risk still remains after applying the above control measures, the following controls are considered in order to minimize the residual risk, as reasonably practicable:
- Using administrative controls (eg, reviewing warning signs or delivery times to prevent or reduce the need for pedestrians and vehicles to interact),
- Use of personal protective equipment (eg: high-visibility workwear)
- If a single control is not sufficient to minimize risks, a combination of the above-mentioned controls may be used.

Mitigation Measures and Management Controls

A set of management controls should be developed to manage the identified risks and impacts. Basic management controls are outlined in the Risk Management Procedure. Additional procedures and guidelines may be developed as needed to support this Management Plan. It includes basic management controls determined by NMM Project Management.

6.3. Competence Requirements, Evidence and Acceptance of Competence, Special Training

In the NMM Project, only employees with the competency specified in this document are assigned in the field of traffic management. The minimum competency requirements for the designated tasks are defined below.

Table 1. Competency Matrix

• Position	• Professional competence	• Experience	• Technical Training
• **Traffic Safety Officer**	• **At least Secondary Education Graduate**	• **At least 3 years in traffic management**	• **At least 1 day of theoretical and practical training in the field of traffic management in the last 2 years from an**

			institution approved by the relevant project or enterprise.
• **Flagman**	• **It is defined in the Construction Machinery and Equipment Procedure.**		
• **Machinery and equipment drivers and operators**	• **It is defined in the Construction Machinery and Equipment Procedure.**		

It is required that the flagmen, operators and drivers, who are responsible employees in the field of traffic management, are physically and temperamentally suitable for their work. Recruitment and assignment criteria for drivers, operators and flaggers for eligibility for work are determined by the project and the eligibility approvals for these criteria are recorded.

Visitors / temporary drivers or operators are not allowed to enter the project site with mobile equipment – vehicles unless essential. In case of permission, the individuals must be informed about the traffic management rules, their movements in the field will be kept under close surveillance and a competent worker in the field must guide them as long as they are on site.

For proof of competence and acceptance by NMM Project Management, the following must be provided.

Vocational Qualification: The original or certified copy of the relevant secondary or higher education diploma or graduation certificate.

The original or a copy of the relevant professional qualification or vocational training certificate.

Experience: An employment document or reference letter, stamped and signed by the authorized person, on the letterhead of the institution where he/she worked, showing that he/she has worked during the period of work in the relevant task or field.

Technical Training: It is the original or certified copy of the certificate containing the content, duration, date, name of the participant, information of the training provider organization, or a letter signed by the authorized person on the letterhead of the training provider institution, which contains the same information and confirms the participation in the training. Within the training plan to be made in accordance with the REC-İSG-ÇYS-KMO-PR-05 HSE Training Procedure;

- Defensive Drive Training
- Anti Skid Tutorial
- Off-Road Driving Techniques Training
- Rollover, Crash Simulation Training
- Traffic Safety & Safe Driving Training

Which employees will receive the trainings listed above are defined in the Training Matrix annexed to the REC-İSG-ÇYS-KMO-PR-05 HSE Training Procedure.

License Classes

Table 2. Class Age Requirement-Experience Requiment- The Period Of Validty-Other Clases-For Authorization

SINIFI	YAŞ ŞARTI	DENEYİM ŞARTI	GEÇERLİLİK SÜRESİ	YETKİLİ OLDUĞU DİĞER SINIFLAR
M	16		10	
A1	16		10	M
A2	18		10	M-A1
A	20	EN AZ İKİ YIL A2 *	10	M-A1-A2
B1	16		10	M
B	18		10	M-B1-F
C1	18	EN AZ B	5	M-B-B1-F
C	21	EN AZ B	5	M-B-B1-C1-F
D1	21	EN AZ B	5	M-B-B1-F
D	24	EN AZ B	5	M-B-B1-D1-F
BE	18	B	10	M-B-B1-F
C1E	18	C1	5	M-B-BE-B1-C1-F
CE	21	C	5	M-B-BE-B1-C-C1-C1E-F **
D1E	21	D	5	M-B-BE-B1-D1-F
DE	24	D	5	M-B-BE-B1-D-D1-D1E-F***
F	18		10	M
G	18		10	M

6.4. Vehicle Classification

The following vehicles will be classified as Light Vehicles.

- Passenger cars and pickups
- Vans
- Four-wheel drive, minibuses and pickups
- Personnel transport vehicles with a capacity of 12 or less passengers
- Trucks or vans with a capacity of less than 2.5 tons.
- 2- or 4-wheel drive vehicles with a capacity of less than 2.5 tons.

The following vehicles will be classified as Heavy Vehicles.

- Trucks or vans with a capacity of more than 2.5 tons.
- Buses with a capacity of 12 or more passengers
- Semi dumpers
- Light loaders and loaders
- All dump/freight trucks
- 2- or 4-wheel drive vehicles with a capacity of more than 2.5 tons;
- Water tankers.

6.5. Traffic Signs

With regard to off-site project related traffic, it is obligatory to comply with all traffic regulations and warning signs used within the scope of the Highway Traffic Law and related regulations and in order to carry out the works safely. For the onsite traffic, , the necessary arrangements and warning signs will be specified for the work areas and the areas where there will be interaction with third parties.

6.6. Sign Types

The road signs used in the NMM Project sites are divided into 3 classes as stated in the Traffic Signs Regulation and are as follows:

1. Hazard Warning Signs (Group T)
2. Traffic Regulatory Signs (Group TT)
3. Stop and Park Signs (Group P)

Special Purpose Signs

It warns of temporary dangers and situations.

6.7. Speed Limits

The minimum and maximum speed limits per hour for non-trailer vehicle types are shown in the table below, except for the records and conditions written in the Highway Traffic Law and the Highway Traffic Regulation, and unless there is a sign to the contrary, on the highways at and outside the project manufacturing site. Everyone defined within the scope of the procedure is obliged to comply with these speed limits.

- **Table 3. Highway Speed Limits**

Highway Speed Limits				
Vehicle Type	**Inside the Residential Area**	**Outside of Residential Area**		**On Motorways**
		On Intercity Bidirectional Highways	**On Divided Roads**	
Automobile (M1), (M1G)	50	90	110	120
Minibus (M2)	50	80	90	100
Bus (M2-M3)	50	80	90	100
Pickup Truck (N1), (N1G)	50	80	85	95
Panel Van (N1)	50	85	100	110
Truck (N2-N3), Tractor (N2-N3)	50	80	85	90
Motorcycle (L3)	50	80	90	100
Motorcycle (L4, L5, L7)	50	70	80	80
Motorized bicycle (L1, L2, L6), Non-motorized bicycle	30	45	45	Not Allowed
Vehicles carrying dangerous goods (unless there is a contrary provision in their documents)	30	50	60	70
Vehicles on the road with a special cargo transport permit or a special permit (unless there is a contrary provision in the documents)	30	50	50	60
Rubber wheel tractors	20	30	40	Not Allowed
Vehicles towing a faulty vehicle	20	20	30	40

Construction machinery (Excluding Forklift)	20	20	20	Not allowed without permission from the agency responsible for the maintenance and repair of the motorway

The speed limits on the access roads of the project manufacturing & construction sites will not exceed the limits shown in the table below unless otherwise indicated by signs.

Table 4. Project Campus and Work Sites Speed Limits

Project Campus and Work Sites Speed Limits				
Vehicle Type	**On Campus Roads**	**On-Site Roads**	**Secondary Roads**	**Village Passes**
▪ Automobile ▪ Minibus ▪ Bus ▪ Pickup truck ▪ Van	30	30	30	30
▪ Truck ▪ Tow Truck	30	30	30	20
▪ Vehicles carrying hazardous items (unless there is a contrary provision in their documents),	30	30	20	Not Allowed
▪ Vehicles on the road with a special cargo transport permit or a special permit (unless there is a contrary provision in the documents)	30	30	30	20
▪ Rubber wheel tractors	20	20	20	20
▪ Vehicles towing a faulty vehicle	20	20	20	20
▪ Construction machinery (Excluding Forklift)	20	20	20	20
▪ Forklift	15	15	15	15

6.8. MEPI Guide

The MEPI (Mobile Equipment People Interface) Guide is a guide in the field of planning the activities of projects to identify and mitigate risks arising from moving vehicle – equipment traffic.

The following risk control hierarchy steps are applied to mitigate risks of intolerable magnitude determined according to the MEPI Guidelines:

- **Elimination / displacement**
- **Removal**
- **Elimination**
- **Queuing up**
- **Separation**
- **Change**
- **Engineering measures**
- **Barricades, space limitations**
- **Ground suitability**
- **Vehicle / body selection**
- **Maintenance - Repair**
- **Lighting,**
- **Communication tools**
- **Stopper / embankment**
- **Anti-roll structure (ROPS)**
- **Warning systems**
- **Warning signs**
- **Visual and audible warning system**
- **Reversing Alarms**
- **Administrative Controls**
  - **MEPI Guideline is shared as Appendix - 2 of the procedure.**
- **Orientation**
- **Competence**
- **Location preview**
- **Fatigue management**
- **Procedure, plan, policy**
- **On the job talks / TRIC**
- **Vehicle roads**
- **Weighbridge inspection**
- **Homogeneous load distribution control**
- **Canvas / wheel cleaning**
- **Walkways**
- **Traffic plan / control**
- **Speed:**
- **Flagman**
- **Site inspections**
- **Personal protective equipment**
- **Reflective clothing**
- **Noise**

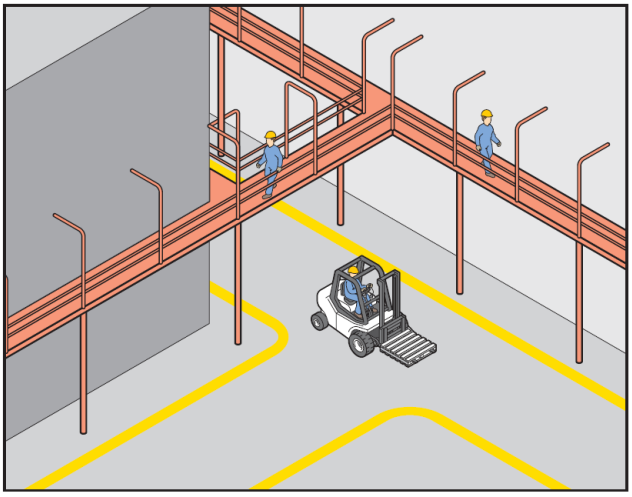
6.9. Reducing Vehicle, Machinery Equipment Traffic

- In the project, traffic needs analysis is carried out periodically under the leadership of the Traffic Safety Officer and with the participation of all activity responsible. In this study, the pedestrian and vehicle traffic requirement that will be caused by each activity to be carried out in the field is determined.
- As a result of this analysis, measures are defined and implemented in order to reduce the amount of traffic needed. Measures may include:
- Establishment of equipment parking areas away from employees' places,
- Increasing the number of entrance and exit gates to the field as much as possible,

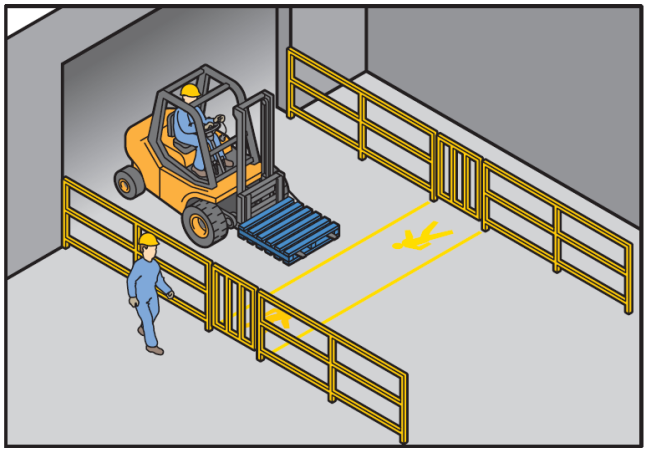
- Determination of visitor and employee parking areas off-site,
- Vehicle restrictions at the site entrance,
- Action planning to reduce the number of moving equipment using field roads at the same time.
- The traffic need analysis and the measures defined for this item are specified in the Traffic Management Plan and are updated periodically.

6.10. Reducing Mobile Vehicle - Equipment and Human Interaction, Minimizing Its Impact

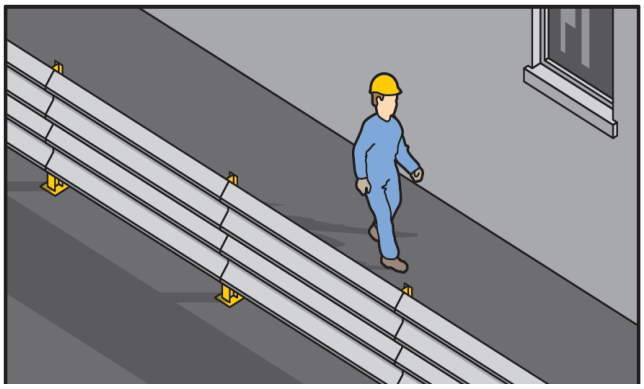
- In cases where vehicle traffic cannot be eliminated or the risk of its reduction cannot be reduced to a reasonable level, measures are taken to eliminate vehicle and pedestrian interaction.
- At the beginning of these measures is the separation of pedestrian and vehicle roads in the field with physical barriers. With this method, it is ensured that pedestrians are not on the vehicle roads in any way.
- In addition, the following measures are taken:
- Pedestrian entry restriction in areas where mobile vehicles are busy (such as loading and unloading areas),
- Vehicle entry restriction in areas where pedestrians are concentrated,
- Appointing sufficient number of flaggers to warn and guide pedestrians and vehicles in case of possible non-compliance,
- If the intersection of pedestrian and vehicle traffic is unavoidable, sequencing with overpass, signaling or markers at these intersections,
- Good level of illumination on all pedestrian and vehicle roads and especially at intersections,
- The ground and route of the pedestrian roads should be formed in a way preferred by the users and any materials etc. not blocked by
- Activity planning such that pedestrian and mobile equipment are not concentrated in the same place at the same time.
- Project-specific measures to eliminate mobile vehicle-equipment and human interaction are not limited to the above.
- Sample applications that will eliminate mobile vehicle-equipment and human interaction are indicated in the figures below.



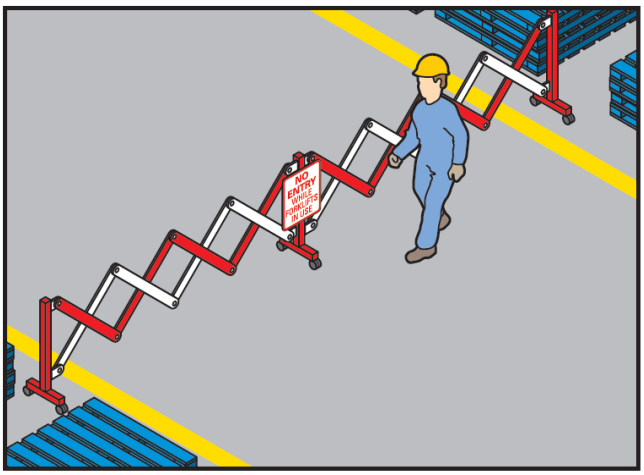
- **Figure 1. Vehicle – equipment and pedestrian path separation example – Pedestrian paths taken up.**



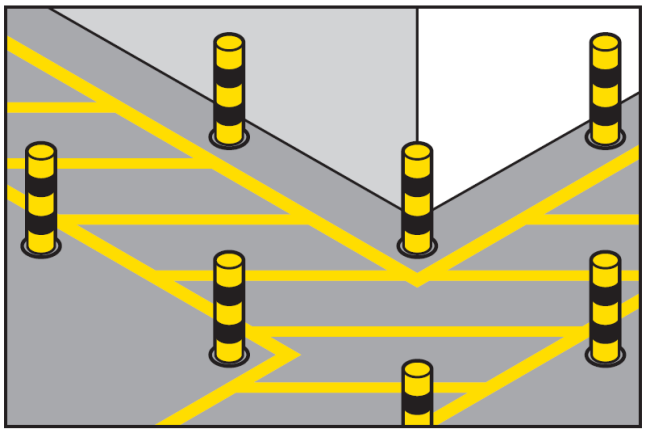
- **Figure 2. Vehicle – equipment and pedestrian path separation example – Standard barriers**



- **Figure 3. Vehicle – equipment and pedestrian path separation example – Crash-proof barriers**



- **Figure 4. Vehicle – equipment and pedestrian path separation example – Temporary barriers**

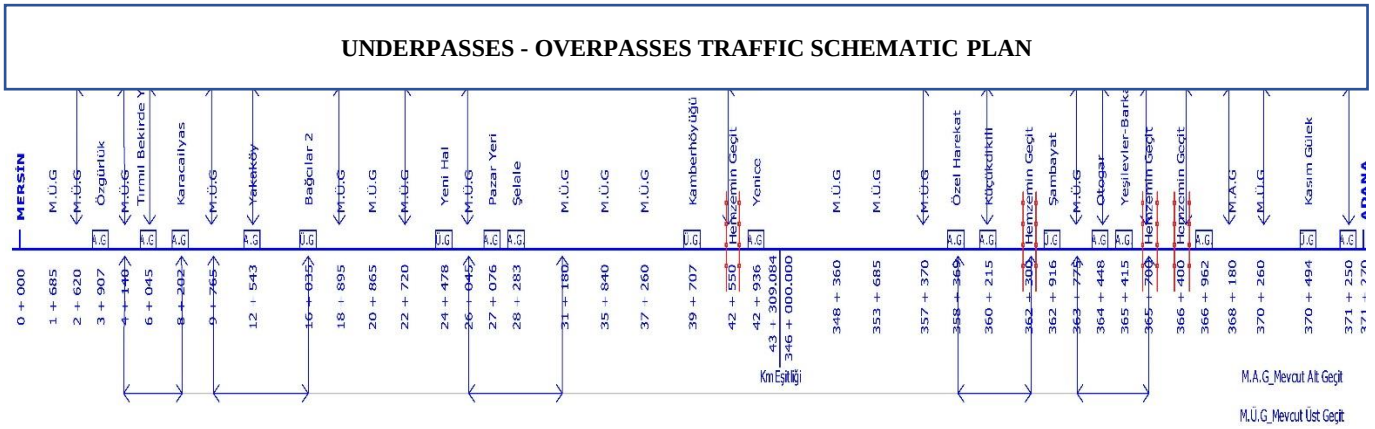


- **Figure 5. Example of vehicle – equipment and walkway separation – Painted and protected at critical points by strong struts.**

6.11. Areas to Create Traffic Circulation Plan and Schematic Plan

During the manufacture of the art structures (Overpass, Underpass, Culvert, etc.) to be manufactured within the scope of the project, the relevant institutions/organizations (UKOME, etc.) should be contacted and the necessary permit processes should be followed. Preparation of circulation plans and permit processes are carried out by the Traffic Safety Officer. Traffic Circulation Plans are created by considering the requirements of REC-İSG-ÇYS-KMO-PR-04 Hazard and Risk Management Procedure and Highway Traffic Law. While creating the plans, care is taken to keep the third-party vehicle traffic and the construction site vehicle-machine traffic separate from each other.

The major engineering structures to be manufactured and the route km information they take place in the project are given below. The elements to be interacted with at these points and the details of the measures to be taken will be included in the Traffic Management Plan.



6.12. Reducing the Backward Maneuver

- Reversing maneuvering of the moving vehicle – equipment is avoided as much as possible in the project. Where avoidance is not possible, the following measures can be applied:
- One-way planning and creation of field access roads,
- Identifying and marking reversing maneuver areas, well lit and not allowing pedestrians to enter,
- Reversing alarm / motion alarm in vehicles, use of mirrors, sensors and cameras,
- The reversing maneuver must be carried out under the guidance of competent flaggers.

6.13. Mobile Vehicle - Availability of Equipment and Access Routes

The following measures are taken, where reasonably practicable, to eliminate hazards arising from the moving vehicle – equipment or access roads used:

- Application of age limit for mobile vehicle – equipment,
- Ensuring that mobile vehicle - equipment maintenance is carried out in accordance with manufacturer's instructions, legal requirements and REC requirements,
- Daily and monthly checks and follow-ups of moving vehicle – equipment,
- Periodic inspections and visas of mobile vehicles and equipment and their close follow-up,
- Construction of the ground of the access roads in accordance with the usage load and traffic density,

- Physical barriers protect shoulders and excavations where mobile vehicle – equipment can fall on access roads.
- All conditions and monitoring methods defined for moving vehicle – equipment and access roads are specified in the project / operation Traffic Management Plan.

6.14. Employee Informing and Supervision

At the workplace, the persons and methods that will provide the NMM Project employees, all subcontractors, suppliers and visitors with the necessary information, training, instructions and supervision to protect themselves and others from traffic-related risks are defined and specified in the project Traffic Management Plan.

In the light of the methods specified in the Traffic Management Plan, all employees, suppliers and visitors regarding field traffic practices (e.g. pedestrian and vehicle roads, markings, speed limits for drivers and operators, parking areas, reverse maneuvering areas, duties and responsibilities of flagmen, prohibited areas) etc.) training and information are provided and updated at regular intervals. Training and information records are kept. Detailed information on visitor trainings can be found in the REC-İSG-ÇYS-KMO-PR-05 HSE Training Procedure.

Information and trainings are prepared and organized in a way that all employees can understand.

All managers, supervisors, engineers and foremen working in the NMM Project are responsible for warning about the dangerous situations and behaviors they see regarding traffic safety, and to take steps to ensure that these situations and behaviors are eliminated.

The NMM Project analyzes the training needs of all drivers as a result of the risk assessment on driving safety and ensures that they receive driving training during their employment. In driving training, safe driving conditions and expectations in the project must be clearly conveyed and explained to all drivers. Based on the risk assessment, drivers receive the trainings specified in the Training Plan, which is an appendix to the REC-İSG-ÇYS-KMO-PR-05 HSE Training Procedure.

6.15. Signs, Warnings and Visibility

In order to reduce field traffic risks and to increase visual warnings and visibility, the following additional measures are taken in the project:

- The use of flashers and other illuminated signs at intersections of moving vehicles - equipment and pedestrians and other possible critical points,
- Use of high-visibility workwear for all employees,
- Using the headlights of the vehicles on,

- Signs, convex mirrors, indicating vehicle and pedestrian route routes and route changes,

Traffic lights applications on pedestrian-vehicle intersections.

6.16. Safe Working Practices

The NMM Project Management is required to create the driving rules, share them with the employees, and have them signed and recorded by all drivers and employees, without being limited to the following requirements.

Project driving rules: Project Management determines the driving rules for all trips that will take place within the scope of the project and announces them to all drivers. It implements programs to encourage compliance with these rules, determines and implements sanctions for violations.

Safety belt: It is mandatory for all drivers and operators to use seat belts while working or moving with vehicles and equipment at the project site. If the vehicle and equipment has the capacity to carry passengers other than the driver or operator, all passengers except the driver or operator must use seat belts during movement and operation.

Cell phone use: It is forbidden for the driver or operator to use mobile phones, other communication tools (except for listening to the Beacon's radio commands), other video and audio devices, headphones and any other device, equipment or tool that will distract attention during the operation or movement of vehicles and equipment at the project site. Passengers in the vehicle or equipment may not engage in any behavior that may distract the driver or operator.

In obligatory cases, drivers are expected to take the vehicle to a safe area in accordance with the traffic rules in a way that does not endanger themselves and the traffic, and carry out their negotiations.

Alcohol and Drug Use: It is forbidden to use alcohol or drugs in the project site or to be in the project under the influence of alcohol or drugs. Persons who violate this prohibition will be sanctioned under the "Zero Tolerance Policy". The project company may request random or specific drugs test by way of urine sample at any moment, unless prohibited by national laws. Refusal to be tested is grounds for dismissal.

Details on the zero tolerance policy are contained in the REC-İSG-ÇYS- KMO-PR-07 HSE Disciplinary Procedure.

Unauthorized Passengers: REC property or mobile vehicles – equipment rented by REC for use in the project cannot transport persons who are not employees of the REC or subcontractor.

Tired Driving: Working hour requirements for drivers and operators at the REC are determined by local legal requirements. It is ensured that drivers are sufficiently rested before starting each trip. Drivers are reminded in training and briefings that they should regularly stop in a safe place and take a break when they feel tired. Maximum driving hours and minimum resting times recommendations are detailed in 6.17-1. Driving and resting times defined for the project are specified and implemented in the Traffic Management Plan.

When drivers have to drive in severe weather or rough terrain, working hours are determined by the risk assessment.

Working and break times of drivers and operators are monitored and recorded.

NMM Project Management applies awareness programs to drivers in this area, creates an inspection plan that will eliminate the risk of drivers driving when they are tired, and performs the inspection of the implementation stages. The management of these activities is carried out by the traffic safety officer.

The following rules regarding driving and duty hours (Table 6.18-1) apply to all drivers.

Table 5. Recommended work and break times for drivers

Requirement	Rule
Maximum driving time between breaks	15-minute break every 2 hours.
Required break time out of 4,5 hours total driving time	45 minutes
Maximum duty hours in a 24-hour period.	11 hours (i.e. the vehicle cannot be used after 11 mission hours) (Duty hours include work-related travel).
Maximum driving hours in a 24-hour period	8 hours in total, excluding commuting time, 9 hours including commuting time.
Leave period after 6 days	At least 24 hours of uninterrupted rest before driving again.
Minimum daily rest period between work shifts, if appropriate	11 hours (can be reduced to 9 hours for a maximum of 3 times a week)

Parking Applications: There may be a parking space requirement for field workers, visitors, suppliers and other requests. It is ensured that the parking areas have the following qualities:

Located away from busy work areas and traffic arteries,

Walking routes where pedestrians can reach their vehicles safely are defined and physically separated, clearly marked, well lit and unblocked,

It is planned to be suitable for parking with reverse manoeuvre.

Loading and Unloading: To minimize the risks associated with loading and unloading, operators are provided with adequate information about the nature of the load and the need

for it to be loaded, secured and unloaded appropriately. The loading and unloading area provides the following qualities:

- Away from heavy traffic and people not involved in the activity, with flat floor,
- Separated from other work areas,
- Away from overhead cables, pipes or other obstructions,
- Not exposed to bad weather if possible.
- Before loading or unloading, make sure that the brakes of vehicles and trailers are active and that all outriggers are in the correct position if used. There is a safe place for drivers and operators to wait during loading and unloading.
- Measures are taken to prevent vehicle traffic during loading or unloading in loading areas.
- The circulation of heavy tonnage loads in the project area: NMM Project Management plans the activities such as heavy tonnage equipment entry to the site, circulation within the site, loading and unloading, evaluates the risks specifically and defines and implements the measures. It keeps records of planning and risk assessment. In the planning carried out, as a minimum;
- Duties and responsibilities of the persons to be assigned,
- Tools and equipment used and their technical specifications,
- There are on-site circulation plans and lifting plans.
- Dump Discharge: The following precautions are taken to prevent events such as equipment tipping during dumping operations:
- Tipper discharge is carried out on flat and levelled ground,
- Towing units and articulated trailers are aligned,
- Wheel stoppers are used where possible,
- The tailgate is released and secured before tipping over.
- It is ensured that there are no pedestrians in the unloading area,
- Vehicle is not left unattended and cabin doors are kept closed.
- Make sure that there are no overhead obstacles such as power lines,
- If loads stick to the damper during unloading,
- The equipment is not driven to unload, the tipper is lowered and then raised again.

- Operators are not allowed to climb into the elevated tipper section to unload the load.

Equipment Overturn: Moving vehicle – to minimize equipment tip-overs, ensure that:

- Vehicle-equipment suitability,
- The condition and slope of the surface,
- Vehicle – equipment operating speed,
- Avoiding sharp bends in the field,
- The nature and location of the cargo,
- Rollover prevention structures (ROPS).
- Drivers and operators are kept under surveillance to maintain safe working habits.

Truck Covering: The following steps are followed to prevent falls while covering:

- Wherever possible, the opportunity for covering to avoid working at height is sought,
- If it is not possible to avoid working at height, obstacle platforms are used to prevent falling,
- If there is still a risk of falling, personal protective equipment is used to minimize both the distance and the consequences in the event of a fall.
- Collective protective measures are given priority at each step.
- The walkways of the working platforms are made of non-slip material. The manufacturer is consulted before installing a coating system on any truck.
- Smoking In vehicles and equipment at the project site, when parked, during operation or movement; It is forbidden for the driver, operator or passengers to smoke or act or act in an open flame or hot spark that may cause a fire.

Pre-Use Checks: All mobile vehicles - equipment used in the project are subject to pre-use checks by the driver or operator before use. Although pre-use checks are not recorded for automobiles and pick-up vehicles, for heavy-duty equipment these checks are made and recorded on a checklist. Pre-use inspection requirements and forms defined for heavy-duty equipment are defined in the REC-İSG-ÇYS-PR-24 Construction Equipment and Equipment Procedure.

Emergencies: Drivers / operators or passengers should never jump from equipment in motion or out of control.

Personal Protective Equipment It is mandatory for drivers and passengers to wear reflective vests on and off the field to increase their visibility when outside or near moving vehicles. These vests are delivered to all drivers with a report by the relevant REC Administrative Affairs

department within the scope of PPE. The situations in which these vests should be used are defined in detail in the driver's instructions.

Night Driving: All vehicles driving at night must have working headlights, taillights and signals. When driving with high beams, it is necessary to switch to low beams at least 200 meters before encountering traffic coming from the same or the opposite direction. Vehicle drivers should check that the headlight and taillight assembly and signals are in working condition before moving with the vehicle.

6.17. General Offsite Transportation and Traffic Safety Rules

REC NMM employees and subcontractors must comply with the following rules on all roads within the access road and project site, as well as the highways around the project site.

- Local authorities will be informed regarding the date, time and route of the transportation activity.
- Traffic signals and signs will be set up and will be clear and visible
- Temporary traffic control methods will be applied at intersections and connections that hold higher risk for accidents.
- All drivers will obey the national speed limits and the drivers will be trained on the all Turkey traffic rules.
- REC to ensure construction area provides measures and signage for safe pedestrian crossing. Crossing locations should take into account community preferences, including those related to convenience or personal safety.
- Installation of barriers (e.g. fencing, plantings) to deter pedestrian access to the Project except at designated crossing points.
- Supervision and escort for heavy machinery (which requires escort and permit in line with national Legislation) will be provided.
- Project related traffic will be regulated during certain dates and times where local community will require to commute (to/from schools, commercial areas etc.) or take on any agricultural activity (animal grazing or other farming activities etc.).
- Temporary access to private property or appropriate accessing alternatives will be determined in consultation with the land owners or users.
- Local authorities and community will be provided with detailed information on closure of roads during the road crossings.

- Methods for every road crossing will be determined and agreed upon with authorities prior to taking any action. All methods and construction techniques proposed by the REC will aim to minimize possible disruptions caused by road crossings.
- REC will ensure that road safety training will be provided to employees.
- The schools nearby the Project site will be informed about the peak movements of the vehicles and vehicle traffic will be minimized during hours when children are traveling to and from school.
- Heavy machinery and vehicles utilized in transportation activities (including transportation of personnel) will be used by qualified and licensed drivers.
- All drivers will know and comply with all traffic signs, will be made aware of hotspots of intense traffic that are expected along the route and are trained properly for on and off-road conditions.
- Managing and monitoring of working and resting hours drivers will be undertaken according to Turkey Legislation.
- Monitoring security arrangements for loads, vehicles and drivers will be undertaken according to Turkey Legislation.
- All project work sites, Project Facilities, temporary roads, and traffic management works will be signposted in line Turkey Legislation and as required by the Traffic Management Plan TMP).
- Night drive/transportation will be limited as much as possible to reduce the risk of accidents and obtaining necessary permits shall night transportation be required.
- Compensating damages caused by an accident due to project activities will be undertaken according to national legislative requirements and the Grievance Mechanism defined in the Stakeholder Engagement Plan (SEP) of the Project.
- A Grievance Mechanism Procedure will be set up for communities and individuals to formally communicate their concerns, complaints and grievances and facilitate resolutions that are mutually acceptable by the parties.
- The routes of the roads that will be used and the peak hours of the usage of the roads will be shared with village heads and management of the schools.
- The CLOs of the RECs will provide awareness trainings to schools if there is a school located on the route of the roads that will be used. REC E&S and H&S Managers

must ensure that the personnel providing the awareness trainings have received proper training themselves on this topic before the commencement of trainings at schools.

- Installation of barriers (e.g., fencing,) to deter pedestrian access to the Project construction area except at designated crossing points.
- All drivers and operators will have the appropriate class driver's license and/or operator's license.
- It is forbidden to use company vehicles for personal purposes other than those specified in the relevant procedures.
- It is forbidden to engage in behaviors that will complicate, endanger, create obstacles, prevent or make it difficult to see traffic signs, write on traffic signs, damage or relocate them by breaking, drilling, dismantling or otherwise.
- All drivers/operators and passengers in vehicles, work equipment and personnel service vehicles are obliged to use seat belts.
- During village crossings or traffic and transportation activities where the people of the surrounding area may be affected, the local people will be prevented from being harmed by the activities with sufficient number of flaggers and warning signs.
- The speed limit will be applied as 20 km/h for all vehicles and construction machinery at village crossings.
- When the tractor is to be passed in areas close to the villages, it will be ensured that the tractor driver notices the vehicle by sounding the horn before it starts to pass.
- All work equipment and vehicles in the manufacturing area will have yellow flashing beacons while they are in motion. The beacons will be fixed to the appropriate places on the upper part of the vehicles.
- Employees shall not operate any construction equipment or vehicle unless they are instructed to do so and without the appropriate driver's license/operator's license.
- No one other than the operator may travel unless the work equipment has secure seats or seating for other workers.
- It is obligatory for vehicle drivers and construction machine operators to comply with the maximum speed limits determined by traffic signs at the manufacturing site. Drivers should reduce their speed below the limits according to the weather, road and traffic density.
- Moving vehicles will not be boarded or disembarked from moving vehicles.

- Operators or drivers will stop the vehicle completely and apply the parking brake before leaving the cabin of the vehicle or truck they are using.
- Vehicles and construction equipment will be parked backwards to the exit direction as long as they do not pose a safety risk. Warnings and signs in this regard will be respected.
- All field vehicles and work machines will have working reversing alarms.
- Employees shall not travel by hanging on the outside of vehicles and work equipment.
- It is forbidden to use mobile phones while using vehicles and work machines. Cell phone calls will be made after the vehicle/construction machine is parked in a safe place off the road.
- Long materials (loads) will be transported by suitable vehicles. Loads can be transported no more than 2 meters from the rear of the vehicles and 1 meter from the front. Drivers are responsible for transporting loads safely. When any load appears to be protruding from the vehicle body, the load shall be well secured and marked for visibility. If transportation outside the standards will take place, it will be done with an accompanying vehicle.
- Operators and drivers will prevent contact with cargo and vehicle by constantly observing overhead power lines, transitions under conveyor belts and signs indicating them.
- Smoking and eating/drinking are prohibited while using vehicles and work equipment.
- Drivers/operators will clean up immediately if the headlights, lamps and turn signals are covered with mud in wet weather.
- Overtaking is prohibited on sections of the road where there is no overtaking sign or where overtaking would pose a danger.
- In all vehicles moving in and out of the manufacturing area, the equipment listed in the Table No. 1 in the 'Highway Traffic Regulation' (the table showing the equipment to be kept in the vehicles and their qualifications) will be available and will be available. Although the equipment specified in the chart is available, it is obligatory to have at least 1 fire extinguisher, 2 triangle reflectors, first aid kit, spare wheel (spare tyre), jack, chock, wheel wrench, towing rope, flashlight, reflective vest and chain in winter.

Travel Plan

Regarding construction travel plan, these mitigation measures will be taken:

- Provisions of buses to transfer workers from the workers accommodation camps and from local communities to the work-site and back
- Minimise the number of private vehicles entering the construction compounds (where the workers accommodation will be), or construction compounds of worksites
- Ensure there is sufficient car parking space at the workers accommodation and work site within the land allocated to the Project
- Measures to ensure car-sharing or other sustainable travel (public transport, cycling, walking,) is promoted

7. TRAINING

Specific training associated to Traffic and Transportation will be given to the project personnel by REC as follows:

Table 6. Training Topics

Subject	To / By	Time	Frequency
Traffic Awareness Training	To all personnel by H&S Manager	Prior to commencement of work	Once prior to commencement of work
Traffic and Transportation Safety Training	To REC and subcontractor drivers by H&S Manager	Prior to commencement of work	Once prior to commencement of work
Community Traffic Safety Awareness Training	To the affected community and school children if applicable by H&S Manager and Community Liaison Officer	Prior to commencement of work	Once prior to commencement of work

Further, training guidelines and requirements expounded in the CESMP apply.

8. MONITORING, VERIFICATION AND EVALUATION

Processes for monitoring, assessment and audit will be developed by REC to:

- Document the implementation and effectiveness of management and mitigation measures
- Assess actual impacts against predicted impacts
- Demonstrate compliance with applicable legal and other requirements

REC will undertake periodic evaluation and verification to determine the degree to which the commitments outlined in this Plan are being met. The evaluation will be undertaken by suitably qualified personnel. Assessment findings will be prioritised and closed in a timely manner.

Additionally, the Project Owner will undertake both desktop and field-based inspection programs to confirm that specified mitigation measures are being implemented effectively.

9. REPORTING REQUIREMENTS

The following reporting requirements apply for the REC:

- Incident reporting (as necessary, addressed in terms of the Accident and Incident Management Procedure);
- Emergency response reporting;
- Records of annual emergency response training exercises;
- Biannual reports on KPIs and performance trends;
- Monthly reports of relevant training activities completed and attendance registers to be maintained;
- Daily/Weekly/Monthly reports of site inspection activities;
- Audit reports;
- Inspection logs and status of non-compliances; and

In addition, the following external reporting will be done:

- Monthly and biannual ESHS reports on KPIs and performance trends will be submitted to SPV;
- All environmental and social incidents will be appropriately documented, notified and reported in accordance with established procedures to
- Incident notification and reporting to relevant Turkish regulatory bodies will be performed in line with applicable legislation in force and as stipulated in permits and licenses.
- The Lenders will be notified of incidents pursuant to the terms and conditions agreed upon in the Finance Agreements through SPV.

10. KEY PERFORMANCE INDICATORS

Following Key Performance Indicators (KPIs) will be monitored, verified and evaluated by the relevant parties in accordance with their responsibilities set forth in the scope of the REC-HSE-EYS- KMO-PR-08 HSE Monitoring, Verification and Evaluation:

- Number of fatalities caused by project associated traffic activities
- Number of serious injuries caused by the project associated traffic activities
- Obeying specified traffic speeds
- Violation of Driver Protective systems
- Overloading of material and persons to vehicles
- Alcohol usage when driving
- Inattention to Behaviour of pedestrians
- Fatigue Driving
    - **Table 7. KPI's for Traffic Management**

Traffic Management			
Subject	**KPI**	**Target (To help ensure the safety in traffic).**	**Period**
To ensure that the necessary security measures are taken and controlled traffic safety	Number of fatalities	0	Yearly
	Number of serious injuries	0	Yearly
	Exceedances of speed limits	0	Yearly
	Violations of Driver Protective systems (eg; Safety Belt)	0	Yearly
	Overloading of material and human to vehicles	0	Yearly
	Alcohol usage when driving	0	Yearly
	Inattention to Behaviour of pedestrians	0	Yearly
	Fatigue Driving	0	Yearly
	Percentage of traffic safety training to all employees	100%	Yearly

11. ANNEX

Feedback Form

User Feedback Sheet			
The user shall give feedback to the responsible parties of the document for required action in case there are inaccuracies, errors or uncertainties identified in the document. The user is requested to submit this form by completing it in full and clearly indicating the suggested changes.			
User Name			
Document No.		**Date**	
Page Ref.	**Descriptions and Reasons for Changes / Corrections Considered Necessary**		

Send this Sheet to:	**Supervisor or Corporate HSE Management Department**