



TURKEY

SUSTAINABLE CITIES PROJECT – II Additional Financing (P170612)

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

FINAL

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EXECUTIVE SUMMARY

Project Description

Iller Bank (hereinafter referred to as ILBANK) (Turkey's Bank of Provinces) and the World Bank (WB) designed the Sustainable Cities Projects (as a Series of Projects, SCP I and II are already in implementation and this ESMF is prepared for Additional Financing (AF) of SCP II to establish an additional support mechanism for meeting the increasing demand from Municipalities for investments in sustainable urban development that has been ongoing under the Sustainable Cities Program. This program aims to support municipalities to improve urban planning, infrastructure and capital investment planning, and to strengthen municipal financial capacity (including creditworthiness).

The investments carried out through the Project will adhere to both the Republic of Turkey Environmental Regulations and WB Safeguard Policies. In order to do so, ILBANK will act as the financial intermediary to ensure that related WB policies and procedures are followed and ensure that all Turkish environmental approvals, licenses and permits have been secured. Previously, WB has financed a similar project called the Municipal Services Project (MSP), through ILBANK. MSP successfully provided financing in three specific areas - water supply, wastewater and solid waste investments - for 11 participating municipalities and 2 water utilities. In this respect, SCP I and 2 and 2 AF are the next generation operation which will provide a more dedicated focus to urban planning systems and broadening the program to broader sectors, such as urban transport, energy efficiency, and renewable energy recognizing the importance of these to the sustainability of Turkey's cities.

Objective

The Project Development Objective is ***to improve the planning capacity of and access to targeted municipal services in participating municipalities and municipal utilities (henceforth "utilities")***. The PDO is identical to the Program Development Objective since each project in the series targets individual or groups of municipalities/utilities in ensuring improved efficiency and sustainability of service delivery. The **three components of SCP I** included:

Component A: Sustainable City Planning and Management Systems aimed at supporting reforms including policies and legislation that improve sustainable urban development planning including technical assistance support (i) to municipalities/utilities for planning (including urban planning and capital investment planning) and management and for the preparation of feasibility studies, environmental assessments and engineering designs for municipal sub-projects; and (ii) to ILBANK for management of the grant and capacity building;

Component B: Municipal Investments which finance demand driven municipal investments.

Component C: which finances Project Management.

On the other hand, the **SCP 2 consists of two components:**

Component A: Municipal Investments, which finance demand driven municipal infrastructure investments. Under SCP II, the investments include design and construction of water, sewerage and storm networks, water transmission lines, sewerage collectors and wastewater treatment plants (WWTP) in several districts of Antalya and Mugla Metropolitan Municipalities.

Component B: Project Management (financed by ILBANK) which finances goods and consultancy services for project management, monitoring and evaluation, outreach and communication.

The emergence of **SCP 2 AF**, is a response to ongoing technical assistance for sustainable urban development and capital investment planning being provided under Component A of SCP 1. This exceptional demand includes identification of investments to improve public transport, water and wastewater, solid waste management, renewable energy, energy efficiency, environment, disaster and climate resilience and social infrastructure. The proposed AF will allow ILBANK to finance priority projects in the immediate term. It will also support ILBANK, the Government of Turkey and the WB to expand the sustainable cities approach both sectorally and spatially, which will increase SCP's impact and development effectiveness. The AF will follow the same structure with the SCP 2, having the same two components:

Component A: Municipal Finance to support demand-driven municipal infrastructure investments to improve public transport, water and wastewater, solid waste management, energy, environment, disaster and climate resilience and social infrastructure. The component would finance goods, works, and non-consulting and consultant services, including the hiring of local technical consultants for engineering design and construction supervision.

Component B: Project Management (financed by ILBANK) which finances goods and consultancy services for project management, monitoring and evaluation, outreach and communication.

The SCP 2 AF will be very similar to SCP 2 in terms of nature of the sub-projects (investments). AF sub-projects will not cause any different environmental and social safeguards risks when compared to SCP I and 2.

Investments to be Financed

Investments carried out under the SCP 2 AF will conform to the Republic of Turkey Environmental Regulation and the WB Safeguards Policies (as the lead financier). ILBANK will be the implementing agency of the project, acting as a financial intermediary, will on-lend the loan proceeds to municipalities or utilities. In this capacity, ILBANK will ensure that WB policies on environment are followed as described in this framework, in addition to the Turkish requirements. ILBANK would be responsible to document that all Turkish environmental approvals, permits, licenses have been secured. The potential investment areas covered under the SCP 2 AF project are presented in Chapter 1.

Rationale and Scope of ESMF

The WB's environmental and social safeguards policies require that the borrower country is expected to prepare an Environmental and Social Management Framework (ESMF), integrated with the Regulation on Environmental Impact Assessment (henceforth "EIA Regulation") (Official Gazette No. 29186, November 25, 2014) and WB's Operational Policies. Since the sub-project locations under the SCP 2 AF are not known at the time of appraisal and ILBANK will act as a Financial Intermediary (FI) for the selection of sub-projects, ESMF is the key document to be shared with stakeholders before implementation starts.

The ESMF forms the scope of a comprehensive environmental and social management approach that has been adopted for acknowledging the potential environmental and social impacts of the SCP 2. The ESMF seeks to consolidate and facilitate understanding of all necessary policy and regulatory features of the Turkish Government as well as the WB's environmental and social safeguards policies that are applicable to the project. Currently, the details (location, dimension and design) of the SCP are not definite. Therefore, a detailed assessment of the possible social and environmental impacts of the Project is not possible at this time. However, the ESMF will cover the entire related environmental and social framework from the previous SCP projects and include the impacts of potential new financing options as well. The ESMF serves as an overall and systematic guide covering policies, procedures and provisions that are to be integrated within the overall project period to ensure that the social and environmental issues are systematically addressed at the sub-project stage. Furthermore, the ESMF provides technical inputs and guidance for the SCP from an environmental and social management perspective. Therefore, the application and implementation of the ESMF will guide the integration of social and environmental aspects into the decision making process of all stages related to planning, design, execution, operation and maintenance of sub-projects, by identifying, preventing and/or minimizing adverse social and environmental impacts early in the project cycle.

WB's environmental and social assessment procedures and Turkish legislation, and key gaps and ways to close these gaps are presented in this ESMF. The procedures are separately discussed in the following sub-sections:

- Screening,
- Environmental Assessment,
- Public Consultation,
- Scoping,
- Review of Environmental and Social Impact Assessment,
- Disclosure,
- Monitoring and Inspection.

OP 4.01, 4.04, 4.12, 4.11 are triggered for SCP 2 – AF Project.

With regard to OP 7.50, ILBANK is responsible for ensuring that the sub-projects financed are located and dependent on national waterways only. The waterways identified as NOT an international waterway (do not trigger OP 7.50) in Turkey are the following: Susurluk, North Aegean, Gediz, Kuçuk Menderes, Buyuk Menderes, Western Mediterranean, Antalya, Sakarya, Western Black Sea, Yesilirmak, Kizilirmak, Konya Kapali, Eastern Mediterranean, Seyhan, Ceyhan, Eastern Black Sea, Burdur, Afyon, Orta, Anadolu, and Van.

For Involuntary Resettlement Policy (OP 4.12), ILBANK has prepared a separate document (Land Acquisition and Resettlement Policy Framework - LARPF, etc.) that will also be shared with public through a disclosure meeting together with this ESMF. OP 4.12 compliance will be monitored via semi-annual reports in order to closely follow project implementation consistency with the relevant safeguard documents (LARPF, etc.)

Implementation Arrangements

Key actors in the implementation of this framework are the ILBANK Project Management Unit (PMU), which is already established under the International Relations Department of ILBANK and project proponent municipalities. ILBANK will continue to include both existing environmental and social (E&S) specialists to coordinate the implementation of the Environmental and Social Framework. These E&S specialists will monitor subprojects and provide the necessary guidance on preparation of Category A and Category B Environmental Assessment (EA) and Land Acquisition Plans in accordance with the WB requirements. Furthermore, the E&S specialists will supervise the municipality officials for WB safeguard requirements, consult on Environmental and Social Management Plan (ESMP) implementation and monitor the comments and concern mechanism of the affected groups. Municipalities have the capacity to properly implement environmental and social impacts assessment documents (for both Category A and B) during construction and operational phases. Where such capacity is lacking, the municipalities will be assisted by E&S specialists to supervise the works carried out by the contractor and ensure that the environmental and social impacts assessment documents are followed adequately.

Grievance Mechanism

All municipalities have adopted a service called *Beyaz Masa* (directly translated as “White Table” in English) in Turkey to collect feedback from citizens. This municipal department was established to collect all complaints of, and requests from, local residents and aims to provide possible solutions within the municipal structure for the requested concerns. Although the White Table system is not considered a grievance mechanism, it is still acknowledged as a general complaint mechanism that the municipalities adopted within their structure. Therefore, the White Table system can be used as the actual or additional complaint mechanism for the selected projects since the selected projects will already be within the municipality structure.

The White Table system and the municipalities’ existing communication and public relations channels will be tailored recording only the SCP based grievances.

Any grievance related to a sub-investment financed under SCP 2 AF will be first logged at the municipality/utility level and will be addressed by the municipality PIU satisfactorily within a certain period. If the complainant is not satisfied with the complaint resolution, then the case will be submitted to higher levels of the municipal government. There will be a toll-free number, online and SMS channels available for citizens to submit grievances through the ‘White Table’ system regarding all SCP-related grievances.

TURKEY

SUSTAINABLE CITIES PROJECT 2 Additional Financing

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

1 INTRODUCTION

The Sustainable Cities Program (SCP) aims at supporting the improved sustainability of Turkish Cities. The Sustainable Cities framework recognizes three dimensions of sustainability (environmental, economic/financial and social) and also identifies spatial, environmental and financial planning instruments that are part of a comprehensive and integrated planning process that would move cities along a sustainability spectrum from Planned to Healthy, and finally to Smart City. SCP was designed as a Series of Projects operation and this Environmental and Social Management Framework (ESMF) is prepared for the additional financing of the second project in the series of SCP.

The Program Development Objective is ***to improve the planning capacity of and access to targeted municipal services in participating municipalities and utilities.*** The Program assists cities through: (a) planning for sustainable infrastructure service needs through more comprehensive and integrated municipal planning; (b) developing capital investment plans linked to urban plans in an effort to mobilize long-term financing that is essential in responding to investment priorities; and (c) financing infrastructure service requirements, particularly of the new Metropolitan Municipality Law of December 2012, to expand territorial service coverage.

1.1 Objectives of the Sustainable Cities Project 2 AF

The proposed program is designed as a series of projects (SOP). The SOP instrument is suitable as it will allow for the provision of financing to a single borrower (ILBANK) for sub-national lending to a gradual number of municipalities/utilities that are interested in a sustainable cities project approach to municipal development. It subsequently allows municipalities or a group of municipalities/utilities to access investment financing on a phased-in and demand-driven basis and at a pace consistent with their readiness and ability to meet eligibility requirements. This is the additional financing of the second project of the SOP.

The first project in the SOP, **SCP 1 consists of three Components.**

Component A: Sustainable City Planning and Management Systems aims at supporting reforms including policies and legislation that improve sustainable urban development planning including technical assistance support (i) to municipalities/utilities for planning and management and for the preparation of feasibility studies, environmental assessments and engineering designs for municipal sub-projects; and (ii) to ILBANK for

management of the grant and capacity building. **Component B:** financed demand driven municipal investments. **Component C** financed Project Management of ILBANK.

The second project in the SOP, SCP 2 consists of two components: **Component A:** Municipal Investments. This component was designed to finance demand driven municipal infrastructure investments. Sectors eligible for investment included public transport, water and wastewater, solid waste management, and energy. **Component B:** Project Management of ILBANK (financed by ILBANK) was to finance goods and consultancy services for project management, monitoring and evaluation, outreach and communication. Municipalities under SCP 2 also benefitted from Technical Assistance under Component A of SCP 1, which included the component for Sustainable Cities Planning and Management funded by the European Union.

SCP 2 AF, includes the same two components as SCP2. The SCP II AF will also be very similar to SCP II in terms of nature of the sub-projects (investments). A general description of each potential investment area is described as follows:

Improved Water and Wastewater will be promoted through integrated and sustainable management of water resources, to improve the quality of water and wastewater service delivery, increase access to safe drinking water and protect water services as well as improving storm water services.

Affordable and Accessible Public Transport to reduce air pollution and improve road safety will be achieved through investments aimed at improving the quality and performance of urban transport infrastructure.

Promoting Sustainable, Safe and Environmental Management of Solid Waste through investment in integrated waste management systems.

Reduction in Green House Gas Emissions through the development of renewable and environmentally sustainable energy sources, and improved energy efficiency of municipal service infrastructure and models.

Improving social inclusion and quality of life of residents through investments in social services and public space and public green space.

Building Disaster and Climate Resilience through investment in Municipal Fire and Emergency Services. Municipal fire and emergency services are critical for managing emergencies (traffic accidents, building fires etc) and then reducing the impacts of natural disasters through rapid and professional response. Investments in the modernization and resilience of fire stations and first response buildings is critical, especially given that these buildings may themselves be damaged or collapse in a disaster, especially an earthquake. Moreover, there is a strong possibility that electricity, water and communications may be cut off in a disaster affecting response efforts, unless sufficient backup services are in

place. Finally, municipal fire services do not have access to modern equipment commensurate with their response area and functions.

Improving municipal environments and reducing pollution. This will be achieved through marine litter management, reduction in plastic waste and investments need for implementing clean air compliance action (CAP) plans.

Improved institutional capacity and efficiency at municipal levels for investment in sustainable development. To ensure long-term investment planning and sustained management of urban infrastructure and services.

Therefore, the ESMF of SCP II AF is very similar to the ESMF prepared for SCP II. ILBANK disclosed executive summary of SCP I draft ESMF on its website on August 25, 2014 and it was submitted to the WB Board on September 17, 2014. The final ESMF of SCP I was disclosed on client's website on March 28, 2016 (ILBANK) and on the WB external website on March 29, 2016. The final ESMF of SCP 2 has been disclosed on the client's website on March 16, 2018 and on the World Bank's external website on March 20, 2018.

Investments carried out under the SCP 2 AF will conform to the Republic of Turkey Environmental Regulation and the WB Safeguards Policies (as the lead financier). ILBANK will be the implementing agency of the project, acting as a financial intermediary, and will on-lend the loan proceeds to municipalities or utilities. In this capacity, ILBANK will ensure that WB policies on environment are followed as described in this framework, in addition to the Turkish requirements ILBANK would be responsible to document that all Turkish environmental approvals, permits, licenses have been secured. The potential investment areas covered under the SCP 2 AF project are presented in Box 1.

As general policy, regardless of whether a project is financed through ILBANK's own sources or from the proceeds of a WB loan, ILBANK considers only those project proposals that have fulfilled the requirements of the Turkish Regulation on Environmental Impact Assessment (EIA). In other words, all potential subprojects must have undergone an EIA screening according to Turkish Regulation and either have a positive opinion on the EIA or be assessed not to need an EIA before ILBANK starts reviewing them. Furthermore, no subproject loan may be approved until Turkish and WB environmental and social safeguard policy/regulatory requirements have been successfully completed.

Box 1. Potential Investment Sectors for SCP 2 AF

Field	Anticipated Investments
Water and Wastewater	Upgrades and rehabilitation of critical infrastructure, water leak detection and management systems, energy management systems, procurement of goods critical for quality management of water and waste water services
Public Transport	Transit orientated development, promotion of public transport services and alternative transport such as cycling, efficiency in municipal and city buses, smart transport system solutions and traffic flow optimization
Solid Waste Management	Recycling, reuse, compost etc, modern waste transfer stations, solid waste incineration plants, waste to energy systems and procurement of goods for quality and sustainable management of solid waste
Reduction in Greenhouse Gas Emissions (GHG)	Renewable energy sources (solar, wind), harnessing biogas for energy from waste water treatment plans and solid waste facilities and energy efficiency projects across municipal buildings and infrastructure
Social Inclusion	Development of community centers including those providing specialized social services for youth, elderly, women and disabled, shelters and social housing for elderly and women, and care for the very young through creches and kindergartens as well as provision of age- and -disability-friendly public parks and public green space.
Building Disaster and Climate Resilience	Retrofitting or reconstruction of fire station buildings and purchase of modern equipment for response to flood, fire, earthquake, storm and technological emergencies
Pollution Prevention	Marine litter management, reduction in plastic waste and investments need for implementing clean air compliance action (CAP) plans
Institutional Capacity	Consultancy services in project supervision; capacity development of authorities; planning, feasibility and technical designs and environmental and social assessments; IT and data management systems including city data, management systems, geospatial information systems (GIS) etc. to support technical and planning capacity at the municipal level

Please see Annex 4 for a full list of potential investment areas.

Ineligibility in terms of WB safeguards is another important factor for financing of the projects. Projects on International Waterways that will trigger OP 7.50, and Projects that will trigger Safety of Dams OP 4.37 are considered as ineligible. Additionally, projects which have impact on any Critical Natural Habitats are also defined as ineligible. Definition of Critical Natural Habitats under OP 4.04 covers i) legally protected; ii) officially proposed for protection; or iii) unprotected but of known high conservation value sites.

This document aims at minimizing the additional efforts necessary to meet WB environmental and social safeguards requirements. To this end, it identifies the key differences between the Turkish and WB requirements and defines steps that will fill the gaps.

1.2 Purpose and Scope of Environmental and Social Management Framework

The WB's environmental and social safeguards policies require that the borrower country is expected prepare an Environmental and Social Management Framework (ESMF), integrated with the Regulation on Environmental Impact Assessment (henceforth "EIA Regulation") (Official Gazette No. 26936, October 10, 2013) and WB's Operational Policy for Environmental Assessment (OP 4.01) for the SCP 2 AF. Since the sub-project locations under the SCP 2 AF are not known at the time of Appraisal, the ESMF is the key document to be shared with stakeholders before implementation starts.

The ESMF forms the scope of the comprehensive environmental and social management approach that has been adopted for acknowledging the potential environmental and social impacts of the SCP 2 AF. The ESMF seeks to consolidate and facilitate understanding of all necessary policy and regulatory features of the Turkish Government as well as the WB's environmental and social safeguards policies applicable to the project. Currently, the details (location, dimensions and design) of the SCP 2 AF are not defined, therefore, the detailed assessment of possible social and environmental impacts of the potential sub-projects is to be carried out during the implementation stage. However, the ESMF covers the entire related environmental and social framework from the previous SCP projects and includes the impacts of the new financing options as well.

The ESMF serves as an overall and systematic guide covering policies, procedures and provisions that are to be integrated with the overall project period to ensure that social and environmental issues are systematically addressed at the sub-project stage. Furthermore, the ESMF provides technical inputs and guidance for the SCP 2 AF from an environmental and social management perspective. Therefore, the application and implementation of the ESMF will guide the integration of social and environmental aspects into the decision-making process of all stages related to the planning, design, execution, operation and maintenance of sub-projects, by identifying, preventing and/or minimizing adverse social and environmental impacts early in the project cycle.

2 COMPLIANCE WITH WORLD BANK SAFEGUARDS POLICIES

2.1 The Turkish Regulation on EIA

The Regulation on Environmental Impact Assessment (henceforth “EIA Regulation”) (Official Gazette No. 26939, October 10, 2013) governs environmental impact assessments of investment projects in Turkey and is largely in line with the EU Directive on EIA. The key relevant steps of the Turkish EIA procedure namely screening, public consultation, scoping, disclosure and supervision are briefly reviewed below in the order they are prescribed to occur.

2.1.1 Screening

The EIA Regulation classifies projects into two categories:

- *Annex I projects.* These are projects that have significant potential impacts and *require* an EIA. Annex I of the EIA Regulation lists these projects types, so project proponents are expected to start the EIA procedure without any other screening process; and
- *Annex II projects.* Annex II of the EIA regulation covers the projects that may or may not have significant effects on the environment. Proponents of Annex II projects are required to submit a Project Information File (PIF) to the Ministry of Environment and Urbanization (MoEU). The PIF is prepared following the General Format for PIF provided in Annex III of the EIA Regulation and contains information on: (i) project characteristics and objective; (ii) selected and alternative project sites; (iii) environmental characteristics of the project site and impact area; (iv) significant impacts of the project and measures to be taken; and (v) plan for public participation. A non-technical summary of the above items is also to be added to the PIF. Based on the PIF and the Selection and Elimination Criteria specified in Annex IV of the EIA Regulation, MoEU determines whether an EIA is necessary.

Table 1 provides the list of project types that will be considered for funding under the present project and their category per the EIA Regulation. The social impacts within the screening are not compulsory in the national EIA regulation and generally are either very briefly mentioned or not at all.

TABLE 1. GENERAL PROJECT TYPES AND THEIR CATEGORIZATION (ACCORDING TO TURKISH EIA REGULATION)

Investment area	Annex I	Annex II
Water and Wastewater	<ul style="list-style-type: none"> Extraction or storage of ground water of ≥ 10 million m³/year Transmission of ≥ 10 million m³/year water in between river basins, except transmission of drinking water through pipes WWTP for population of more than 150.000 and/or having 30.000 m³/day flow. 	<ul style="list-style-type: none"> Extraction of ground water of ≥ 1 million m³/year Deep sea discharge Extraction or storage of ground water of ≥ 300.0000 m³/year Water transmission in between river basins (except Annex I projects) Projects on continuous river beds, exceeding 5 km. WWTP for population between 50.000 - 150.000 and/or less 10.000 - 30.000 m³/day flow
Public Transport	<ul style="list-style-type: none"> Highways and state roads Construction of interprovincial roads for ≥ 4 lanes Retrofitting or expansion of interprovincial roads with two or less lanes to four or more lanes, continuous extension of ≥ 10 km. 	<ul style="list-style-type: none"> Trams, rapid transit (metro, subways, undergrounds etc. Ringroads ≥ 20 km. Provincial roads (except village and district roads) Rerouting projects of roads in Annex I and Annex II for more than 20 km. Expansion of existing provincial roads with two or less lanes to four or more lanes, with a continuous length of 20 km.
Solid Waste Management	<ul style="list-style-type: none"> Except, demolishing and excavated soil disposal areas, Landfill, Recycling or Incineration facilities (thermal processes regarding burning with oxygen, pyrolysis, gasification etc.) receiving ≥ 100 tones/da or with an are of ≥ 10 ha. Burning facilities for medical waste with a capacity of ≥ 1 tones/day Waste oil recovery facilities with a capacity of ≥ 2000 tones/year 	<ul style="list-style-type: none"> Except, demolishing and excavated soil disposal areas, Recycling, Composting or Incineration facilities (thermal processes regarding burning with oxygen, pyrolysis, gasification etc.) receiving < 100 tones / day. Interim storage of hazardous and/or processing waste Burning facilities for medical waste with a capacity of 200 – 1000 kg/day and/or physical and chemical treatment facilities for medical wastes

Reduction in Greenhouse Gas Emissions (GHG)	<ul style="list-style-type: none"> • Wind power facilities with an installed capacity of ≥ 50 MWm or ≥ 20 turbines • Solar power facilities with an installed capacity of ≥ 10 MWe or Project area of ≥ 20 ha 	<ul style="list-style-type: none"> • Wind power facilities with an installed capacity of ≥ 10 MWm and less than 50 MWm or ≥ 5 turbines • Solar power facilities with an installed capacity of ≥ 1 MWe or project area of ≥ 2 ha (except roof and frontal systems) • Industrial facilities for obtaining electricity, gas, steam and hot water (total thermal power of 20 MWt-300 MWt)
Social Inclusion	<ul style="list-style-type: none"> • Tourism accommodation facilities (hotels, holiday camps and/or tourism complexes etc. (≥ 500 rooms)) 	<ul style="list-style-type: none"> • Tourism accommodation facilities (hotels, holiday camps and/or tourism complexes etc. (≥ 100 rooms)) • Permanent camping and caravan sites with an area of ≥ 50000 m² • Thematic parks, (information, entertainment and watching facilities with themes such as science, cultural, nature and sports with an area of ≥ 50000 m²) • Ski centers (with mechanical facilities of ≥ 1000 m)
Building Disaster and Climate Resilience		<ul style="list-style-type: none"> • Coastal works and works that result in modification of the coast line for fighting against erosion (jetty, groyne, mole, barrier etc.) (except maintenance of such structures)

*: Energy efficiency projects are not covered in Annex I or Annex II of the national EIA Regulation; and no EIA or PIF is required

Source: Republic of Turkey, Regulation on EIA (Official Gazette No. 29186, November 25, 2014)

2.1.2 Public consultation meeting

For projects that require the preparation of an EIA, the Governorate is required to inform the public that a project application has been submitted in a specified locality, that the EIA process has begun and that the public may submit its comments and suggestions to the Governorate or MoEU. The announcement is made using a variety of methods, including the internet, bulletin boards and loudspeaker announcements. MoEU informs the public of the same through the internet.

A formal public consultation meeting occurs for projects that are subject to an EIA after the screening process and prior to scoping. The project proponent organizes a “public-participation meeting” chaired by an MoEU provincial director in a location that affected local groups can access easily. The invitation to the meeting is published in a national and a local newspaper at least ten days prior to the meeting. There is no requirement that information on the project should be provided to the public, except for the subject matter of the meeting, in advance. However, the EIA Regulation specifies that during the meeting, which is chaired by the Director or a member of MoEU’s provincial directorate, it should be ensured that the public is informed about the project, and its comments and suggestions regarding the project are obtained. The meeting chairperson may request comments in writing too. Minutes of the meeting are kept and submitted to MoEU and the Governorate. The Governorate is required to inform the public about the timeframe for submission of public comments and suggestions. Such comments and suggestions are submitted to the EIA commission.

2.1.3 Scoping

The project proponent presents a project dossier (PIF for Annex II projects or using the PIF outline for Annex I projects) to a commission, which comprises representatives of MoEU and relevant organizations as identified by MoEU. Based on the information submitted, the commission determines the scope of the EIA and the ‘project specific format’ which follows the outline of the “general format” used for the PIF. Furthermore, the commission may exclude or include some items depending on the specific characteristics of the proposed project. The commission also determines the level of detail under each heading depending on the special project’s environmental impacts. In this process, the commission takes into consideration of the opinions expressed during the public participation meeting.

2.1.4 Review and approval of the EIA report

As mentioned previously, the commission revises the draft version of the EIA report. In its review, the commission assesses (i) the adequacy of the EIA report and its annexes; (ii) whether the analyses, evaluations or calculations were adequately substantiated by relevant data and documentation; (iii) whether the potential environmental impacts of the project were evaluated in adequate scope and depth; (iv) whether measures necessary to prevent or mitigate negative environmental impacts have been identified; (v) whether the public participation meeting was carried out in accordance with prescribed procedures and the issues brought up during the meeting were adequately addressed in the report. While the EIA identifies a project’s environmental impacts and

mitigation measures, it does not specify costs and institutional responsibilities associated with these mitigation measures. Neither does the EIA include a monitoring plan.

The final EIA report, which incorporates the commission's assessments, is then submitted to the MoEU for final review. MoEU determines whether the "EIA is positive" in which case the project proponent may implement the project or "EIA is negative" in which case the project may not go any forward.

2.1.5 Disclosure

The draft EIA report is made available to the public for comments at Central MoEU or provincial directorate. After MoEU's final evaluation of the EIA report, the Governorate announces to the public MoEU's decision together with its justifications. Disclosure of the final EIA document is not foreseen in the EIA Regulation.

2.1.6 Monitoring and inspection

According to the EIA Regulation, MoEU monitors and inspects projects that were assessed either "not to need an EIA" or "to have a positive EIA" based on provisions specified in the PIF or the EIA, respectively. Furthermore, the project proponent is obliged to submit monitoring reports to MoEU, which transmits them to the Governorate for disclosure to the public (The form or medium of this disclosure is not specified in the EIA Regulation) In case MoEU determines non-compliance, the Governorate issues a warning. If after the granted time compliance is still not achieved the Governorate may suspend the operation of the plant in question.

2.2 Applicable National Laws on Social Impacts

Although the Turkish EIA Regulation does not entirely meet the requirements of international standards in terms of social impacts, there are some legal arrangements for managing several social impacts. In this respect, the following are identified to be a non-exhaustive list of social legal framework applicable for this project:

- Labor Law (No. 4857), published in the Official Gazette no. 25134 dated 10 June 2003
- Law on Occupational Health and Safety (No. 6331), published in the Official Gazette no. 28339 dated 30 June 2012
- Regulation on Contractors and Sub-contractors, published in the Official Gazette no. 27010 dated 27 September 2008

In terms of involuntary resettlement, the relevant legal arrangements of Turkey are summarized below:

- Expropriation Law, published in the Official Gazette no. 18215 dated 8 November 1983
- Amendment on Expropriation Law, published in the Official Gazette no. 24393 dated 5 May 2011

2.3 World Bank Policies that Apply to the Project

2.3.1 Environmental Assessment Policy OP 4.01

Project categories and screening

Under the WB's Operational Policy for Environmental Assessment (O.P. 4.01), projects are classified as Category A, B and C according to the level of their likely impact on the environment:

- **Category A.** A proposed project is classified as Category A if it is likely to have significant adverse environmental and social impacts (based on type, location, sensitivity, and scale of the project and the nature and magnitude of its potential environmental impacts). These impacts are generally large-scale, irreversible, sensitive, diverse, cumulative or precedent setting and may affect an area broader than the sites or facilities financed by the project. For example, Category A projects have one or more of the following attributes: large-scale conversion or degradation of natural habitats; extraction, consumption, or conversion of substantial amounts of forest, mineral and other natural resources; direct discharge of pollutants resulting in degradation of air, water or soil; production, storage, use or disposal of hazardous materials and wastes; measurable changes in hydrologic cycle; risks associated with the proposed use of pesticides. Indicative examples in the context of the present project include: Construction of a significant new wastewater treatment plant, a new landfill, and rehabilitation of existing landfill with significant environmental impact.
 - **Category B.** A proposed project is classified as Category B if the potential impacts on the environment and social are typically site-specific, reversible in nature; less adverse than those of Category A subprojects and for which mitigatory measures can be designed more readily. Projects in Category B sometimes differ only in scale from Category A projects of the same type. For example, large irrigation and drainage projects are usually categorized as A; however, small-scale projects of the same type may be categorized as B. The same can be true for small-scale, relatively clean (gas or light diesel oil fired) thermal power plants, micro hydro power plants, and small sanitary landfills. Similarly, projects that finance rehabilitating or maintaining an existing infrastructure may have adverse impacts, but are likely to be less significant compared to a Category A project, and would be categorized as B. Indicative examples include: Rehabilitation or construction of water supply and/or sewerage network, water treatment plants, wastewater treatment plants which does not include an expansion or new construction, construction of small-scale water treatment plants, urban transport and energy efficiency. Although it has not been specified in the OP, Category B projects divides in two within its structure as Low B and High B projects in practice. Category High B projects have relatively more impacts and mitigation measures comparing to Category Low B projects, yet the impacts and mitigation measures are not significant enough to be recognized as Category A projects.
- Category C.** A proposed project is classified as Category C if it is likely to have minimal or no adverse environmental impacts. For example, technical assistance projects in institutional development, computerization and training fall in Category C.

When a WB-funded project involves a series of subprojects, which are selected and funded by a financial intermediary (FI) using WB loan proceeds, the project is classified as Category FI. In such projects, the FI screens and classifies the proposed subprojects as Category A, B, or C following the above definitions and ensures that the borrower¹ carries out the corresponding environmental assessment. Since the present project is an FI project, the following discussion will refer to subprojects only.

There are no clear-cut border values distinguishing the categories or, unlike the Turkish EIA Regulation, any ready lists of project types for categorizing projects as A, B and C; rather projects are screened on a case by case basis. Although the categorization of projects are based on the magnitude of environmental impacts, projects with high level social risks may also be determinative in categorizing a project.

Scope of environmental assessment

The scope and type of the EA² varies between Category A and B subprojects.

For Category A sub-projects the borrower is required to prepare an EIA which examines the subproject's potential negative and positive environmental impacts as well as its social impacts, compares them with those of feasible alternatives (including the "without project" situation), and recommends any measures needed to prevent, minimize, mitigate, or compensate for adverse impacts and improve environmental and social performance (see Annex 1A for a suggested format). Analysis of alternatives is a particularly important feature of an EIA. ESIA also includes an Environmental and Social Management Plan (ESMP) which details the measures to be taken during the implementation and operation of a (sub) project to eliminate, reduce or offset adverse environmental and social impacts, the actions needed to implement these measures as well as monitoring indicators and actions and responsibilities (see Annex 1B for an ESMP format). The sample tables provide a list of possible environmental and social impacts that may be encountered in subprojects and defines mitigation measures for each of the impacts presented. A subproject may not be limited to or subject to all of the impact categories defined under this table, thus each subproject will need to prepare a customized ESMP regarding its impacts.

The scope of EA for a Category B subprojects may vary from subproject to subproject, but is narrower than the ESIA required for Category A. Like Category A ESIA, it examines the subproject's potential negative and positive environmental and social impacts and recommends any measures needed to prevent, minimize, mitigate, or compensate for adverse impacts and improve environmental performance. If the project is recognized as B category, this information may be contained in an ESMP only unless there are site-specific issues which necessitating a site-specific assessment in addition to the ESMP. An example is modest scale building construction on a site in

¹"Borrower" refers to borrowing project proponent in FI projects. In the context of the present project, the borrowers are municipalities.

² "Environmental assessment" is used as a general term here.

an urban area which would normally require only an ESMP if it is known that there are no environmental and social issues relating to the site. If it is construction on a greenfield site, a simple EA would be needed to clarify whether there are any special environmental or social issues. The project could turn into Category A if EA work shows likelihood of significant damage to natural habitat or cases where significant amount of land take is required. On the other hand, if the project is recognized as High B, then partial EA document or partial ESIA is required to satisfy the expected requirements.

Public consultation

For all Category A and B subprojects proposed for WB financing, during the EA process, the borrower consults subproject-affected groups and NGOs about the subproject's environmental aspects and takes their views into account. The borrower initiates such consultations as early as possible. For Category A projects, consultations with these groups occur at least twice: a) shortly after environmental screening and before the terms of reference for the ESIA are finalized; and (b) once a draft ESIA report is prepared. The borrower provides for the initial consultation a summary of the proposed subproject's objectives, description, and potential impacts related to both environmental and social issues. For consultation after the draft ESIA report is prepared, the borrower provides a summary of the ESIA's conclusions. For Category B subprojects, at least one consultation is held with affected groups and local NGOs: once the draft EA report (including ESMP) is prepared. The borrower provides a summary of the EA's conclusions. (Please also refer to "g) Disclosure").

In addition, the borrower consults with such groups throughout project implementation as necessary to address EA-related issues that affect them.

For meaningful consultations between the borrower and project-affected groups and local NGOs on all Category A and B subprojects proposed for WB financing, the borrower provides relevant material (in local language) in a timely manner prior to consultation and in a form and language that are understandable and accessible to the groups being consulted.

Review and approval of the EA

In FI projects, the responsibility to ensure that OP 4.01 requirements are met rests with the FI. The EA process should normally be completed prior to the FI's approval of a subproject for financing with a WB loan.

Conditionality

In FI projects, the sub-loan agreement between ILBANK and the borrower must include the conditionality for the borrower to implement the ESMP for Category A and B subprojects. The borrower must monitor and ensure that the contractor is in compliance with the provisions of the ESMP. In order to fulfill its environmental and social obligation, the borrower may incorporate provisions of the ESMP into the procurement documents and contracts for works. Non-compliance may lead to the suspension of WB funding for the subproject.

Disclosure

In addition to the disclosure requirements specified under “c) Public consultation” above, for Category A subprojects, the FI/municipality must make the draft EIA report in local language publicly available to subproject-affected groups and local NGOs; prior to the meeting.

When the ESIA of a Category A subproject is finalized, the FI transmits to WB an English language copy of the final report including an English language executive summary. The Bank distributes the executive summary to its executive directors and makes the report available through its external website.

In case of Category B subprojects, the FI transmits to WB the final English language Category B EA report and WB makes it available through its external website.

Implementation

During subproject implementation, the FI reports to WB on (a) compliance with measures agreed with the Bank on the basis of the findings and results of the EA and additional social assessment (if any), including implementation of the ESMP; and (b) the findings of monitoring programs. The Bank bases supervision of the project’s environmental and social aspects on the findings and recommendations of the EA and social assessment, including measures set out in the legal agreements, any ESMP, and other project documents.

2.3.2 WB Operational Policy on Natural Habitats OP/BP 4.04:

There is some possibility that construction activities under the project may affect critical or non-critical natural habitats (as per WB definition in OP 4.04). Subprojects that have a significant impact on a recognized critical habitat or eco-system will be identified as ineligible and the key issue in the EIA will be the identification of alternatives to the subproject in terms of site and scope. If the subproject’s likely impact on natural habitats is not significant or the impact is not on critical habitats then the first priority is to solve the situation through re-siting, if that is not possible, then the appropriate mitigation measures will be acknowledged for the related circumstance.

2.3.3 WB Operational Policy on Physical Cultural Resources OP/BP 4.11

As the initial stage of baseline studies, literature and surficial studies will be performed. Depending on these studies, potential impact on these sources and related mitigation measures are assessed in EA/ESIA. However, due to the nature of physical cultural resources, buried assets (i.e. graves or mounds) may not be determined during baseline studies. The principal issue is twofold: (i) “chance finds” identification of during construction, and (ii) potential impact of the project on known cultural values. Turkish laws, notably Law No. 2863 dated 21.07.1983 on the Protection of Cultural and Natural Assets (revised through the amendment issued on 27.07.2004 dated Official Gazette) and practices meet the World Bank requirements. The Regulation on Researches, Drillings and Excavations in Relation to the Cultural and Natural Assets, which was published in the Official Gazette No. 18485 dated 10.08.1994 define the procedures and obligations concerning the cultural

and natural assets found out during construction. The municipalities are responsible for the application of the said law and regulation. As part of the regular reporting, the municipalities will inform ILBANK of the historical and cultural findings, if any, as well as the actions taken. ILBANK is responsible for avoiding or mitigating impacts on physical or cultural resources of the financed projects. Therefore, ILBANK will not proceed with sub-project funding until all requirements of the Turkish legislation are met.

2.3.4 WB Operational Policy on Involuntary Resettlement OP 4.12

Since the sub-projects are not known yet, ILBANK has prepared a Land Acquisition and Resettlement Policy Framework (LARPF), which meets the requirements of the Bank's OP 4.12 during cases of land take.

Some of the sub-projects may require additional lands to be acquired for construction. In such cases, municipalities will try to avoid land take by considering alternative lands; which may belong to the municipality itself or any other public lands that may be transferred to the municipality for the Project. Additionally, existing roads and infrastructure lines will be made use of where applicable to avoid taking land in linear sub-project components. When land take is inevitable, Project design will ensure that minimum land take is realized. In cases where there is a need to acquire additional land, a Land Acquisition and Resettlement Action Plan (LARAP) will be prepared by the borrowing municipality according to the LARPF prepared for the Project. Every sub-project that will require acquisition of land shall have an individual LARAP that will be approved by ILBANK and cleared by the WB prior to construction. There may be sub-projects which have already completed land acquisition activities prior to World Bank financing. In such cases, ILBANK will be subject to carry out social audits (Ex Post Social Review) as per LARPF to ensure that land acquisition was completed in accordance with the objectives of OP 4.12. Where necessary, ILBANK will ensure that the relevant municipality develops a corrective action plan to bridge significant gaps.

2.3.5 WB Operational Policy on International Waterways OP 7.50.

ILBANK is responsible for ensuring that the projects financed are located/depending on national waterways only. The waterways identified as NOT an international waterway (do not trigger OP 7.50) in Turkey are as follows: Susurluk, North Aegean, Gediz, Kuçuk Menderes, Buyuk Menderes, Western Mediterranean, Antalya, Sakarya, Western Black Sea, Yesilirmak, Kizilirmak, Konya Kapali, Eastern Mediterranean, Seyhan, Ceyhan, Eastern Black Sea, Burdur, Afyon, Orta Anadolu, and Van. Any sub-project that triggers OP 7.50 will not be eligible for Bank financing.

2.3.6 Safety of Dams (OP 4.37) Any sub-project which results in triggering of the policy will not be eligible for financing under SCP.

2.3.7 Other World Bank Safeguards Policies

No other safeguard policies are expected to be triggered but ILBank will alert the WB if questions arise.

2.4 Key Differences Between the Turkish EIA Regulation and WB OP 4.01 Policy

The Turkish EIA procedures are, with some exceptions, in line with the WB's EA policies. The primary exceptions are in project categorization, content of EA and public consultation.

Project categorization.

Some subprojects covered by Turkish Annex II fall within the WB Category A. For example, where a significant new wastewater treatment plant (WWTP) is proposed for financing which, as a Category A project for the WB requires an ESIA, but under the Turkish EIA Regulation is identified as Annex II requiring a PIF, which after review and decision by MoEU may or may not require an EIA. Some subprojects that are not listed in either Annex I or Annex II of the Turkish EIA Regulation, such as a new WWTP servicing a population of less than 150,000 may under the WB policy be classified as Category B or even Category A project.

EA content

Category A subprojects. A broad comparison of the outline required by WB for a Category A subproject EIA with the general format of a Turkish EIA indicates a number of differences as presented in Table 3. These include notably the absence of an executive summary and information on the policy, legal and administrative framework, as well as possible discrepancies with regard to the level at which the subproject's environmental and social impacts, its alternatives, and mitigation measures for the impacts are discussed. A key gap is the absence of an ESMP with clear specification of actions and delineation of responsibilities. Nevertheless, the project specific format for EIA may require more details under some of these headings than indicated in the general format for PIF. Consequently, a case by case review of the Turkish EIAs is necessary to identify gaps with WB requirements.

Category B subprojects. The content of the EA required by WB depends on the special circumstances of the project. In all cases, an ESMP is required which is only partially covered in a Turkish EIA. The WB also requires partial EA or partial ESIA for Category High B projects, on the other hand, Turkish EIA does not cover in between categorization as Category High B, nor requires any other project documents in this regard.

Public consultation

The "pre-scoping" consultation which is required by Turkish EIA Regulation for subprojects requiring an EIA is largely equivalent to the first consultation required by WB for Category A subprojects. However, WB requires a consultation on draft EA for both Category A and Category B subprojects; there is no equivalent provision in the Turkish EIA Regulation.

Disclosure

The Turkish EIA Regulation only requires announcement of the evaluation result together with the justification. On the other hand, WB has different consultation requirements for Category A and

Category B projects. In line with the WB policies Category A projects require two (2) public consultations, one at the scoping stage (where typically the public will have the opportunity to comment on the TORs for the ESIA) and the second at the draft EA stage. For the Category B projects, in line with the OP 4.01, the draft EA should be made available to local NGOs and project affected groups. For Category B subprojects, the final ESMP report must be published on WB's website. For Category A sub-projects WB requires that the final ESIA report be made available to the public locally in addition to being published on WB's external website and submitted to the WB Board.

TABLE 2. COMPARISON OF TURKISH AND WB CATEGORIES FOR INVESTMENT TYPES COVERED UNDER THE PRESENT PROJECT

	Turkish Category		WB Category	Comments
	Annex I	Annex II		
Solid Waste Management	<ul style="list-style-type: none"> Except, demolishing and excavated soil disposal areas, Landfill, Recycling or Incineration facilities (thermal processes regarding burning with oxygen, pyrolysis, gasification etc.) 		A	If there is a reason to believe that there is likely significant impacts on nature, community health and safety, livelihoods through significant involuntary land acquisition, or air or water quality, project can be classified as Category A, Category High B or Category Low B. Whether the existing impact is examined through initial reconnaissance.
		<ul style="list-style-type: none"> Except, demolishing and excavated soil disposal areas, Recycling, Composting or Incineration facilities (thermal processes regarding burning with oxygen, pyrolysis, gasification etc.). 	Low B	Unless there is reason to believe that there is likely to have significant impacts on nature, community health and safety, livelihoods through any involuntary land acquisition, or air or water quality beyond the landfill site. Whether the impact exists is examined through initial reconnaissance.
Water and Wastewater		<ul style="list-style-type: none"> Deep sea discharge 	A	Could be B only if the discharge is very small and if demonstrated that there is no possibility that the discharge will include hazardous materials.
	<ul style="list-style-type: none"> WWTP for population of more than 150.000 and/or having 30.000 m3/day flow. 		A/High B/ Low B	If there is reason to believe that there is likely to have significant impacts on nature, community health and safety, livelihoods through significant involuntary land acquisition or air or water quality beyond the WWTP, WWTP project with a capacity less than 150,000 person equivalent and/or <30,000 m3/day can be classified as Category High B or B. Whether the existing impact is examined through initial reconnaissance.
	<ul style="list-style-type: none"> Extraction of ground water of ≥10 million m3/year 	<ul style="list-style-type: none"> Extraction of ground water of ≥1 million m3/year 	A/High B/ Low B	If there is a reason to believe that there is likely significant impacts on nature, community health and safety, livelihoods through significant involuntary land acquisition or air or water quality beyond the extraction site, project can be classified as Category A, Category High B or Category Low B. Whether the existing impact is examined through initial reconnaissance.
Public Transport		<ul style="list-style-type: none"> Trams, rapid transit (metro/ subways/underground etc.) 	Low B	Unless there is reason to believe that there is likely to have significant impacts on nature, community health and safety, livelihoods through significant involuntary land acquisition or air or water quality. Whether the impact exists is examined through initial reconnaissance.
Social Inclusion	<ul style="list-style-type: none"> Housing projects >2.000 residences >500 Bed capacity hospitals >50ha Golf facilities >50.000m2 Shopping centers <p>>500 Room touristic residence facilities</p>	<ul style="list-style-type: none"> Housing Projects >200 residences >50.000m2 Education Campuses > 50 – 500 Bed capacity hospitals >50.000 m2 camp and motorhome areas >50.000 m2 theme parks >1000m2 Ski resorts 	Low B	Unless there is reason to believe that there is likely to have significant impacts on nature, community health and safety, livelihoods through significant involuntary land acquisition or air or water quality. Whether existing impact is examined through initial reconnaissance.

		<ul style="list-style-type: none"> <50.000m2 Golf facilities <p>Between 10.000 – 50.000 m2 Shopping Centers</p>		
Reduction in Greenhouse Gas Emissions (GHG)	<ul style="list-style-type: none"> Wind power facilities with an installed capacity of ≥50 MWm or ≥20 turbines Solar power facilities with an installed capacity of ≥10 MWe or Project area of ≥20 ha 	<ul style="list-style-type: none"> Wind power facilities with an installed capacity of ≥10 MWm and less than 50 MWm or ≥5 turbines Solar power facilities with an installed capacity of ≥1 MWe or project area of ≥2 ha (except roof and frontal systems) Industrial facilities for obtaining electricity, gas, steam and hot water (total thermal power of 20 MWt- 300 MWt) 	High B/Low B	Unless there is reason to believe that there is likely significant impacts on nature, community health and safety, livelihoods through significant involuntary land acquisition or air or water quality or biodiversity values. Whether existing impact is examined through initial reconnaissance.
Building Disaster and Climate Resilience		<ul style="list-style-type: none"> Coastal works and works that result in modification of the coast line for fighting against erosion (jetty, groyne, mole, barrier etc.) (except maintenance of such structures) 	Low B	Unless there is reason to believe that there is likely significant impacts on nature, community health and safety, livelihoods through significant involuntary land acquisition or air or water quality or biodiversity values. Whether existing impact is examined through initial reconnaissance.

TABLE 3. COMPARISON OF REQUIRED ESIA REPORT CONTENTS

WB Category A project ESIA requirements	Covered by the Turkish EIA?
Executive Summary	No. (Technical level of information in the non-technical summary required in the Turkish EIA may not meet WB requirements).
Policy, legal and administrative framework	No.
Project description	Largely yes, but may not include supporting infrastructure that may be required.
Baseline data	Yes, but it might not include all baseline data or level of detail that WB may require. There are no provisions for the collection of social baseline data.
Environmental impacts	Yes, but no requirements to discuss residual impacts that cannot be mitigated or to explore opportunities for environmental enhancement. Also no requirement to identify and estimate the extent and quality of data, key data gaps, and uncertainties associated with predictions, or to specify projects that require further attention. Additionally, assessment of cumulative impacts including indirect and induced impacts are not is not discussed in detail. Specially, no requirement to cover cumulative impacts with other projects (past, existing and future) in project influence area.
Analysis of alternatives	Yes. General format for PIF requires that the main alternatives be discussed in summary and the reasons for selecting the proposed site, but does not provide any other specific instructions. The level of detail and depth in the discussion of alternatives in the EIA is determined by the EIA commission appointed by MoEU.
Environmental and Social Management Plan	No. PIF/EIA requires presentation of planned mitigation measures, but not the cost, timing and institutional responsibilities or monitoring arrangements. There are no provisions for the monitoring of social impacts as by national laws collection collection of social baseline data and assessment of social impacts is not compulsory. Therefore, Turkish EIA is not adequate about monitoring arrangements provided in the EIAs.
Social Baseline and Impact Assessment	Partially yes, but the social baselines prepared for the EIAs do not oblige primary data collection at project affected communities and regular stakeholder meetings with all stakeholders. The required social baseline for the Turkish EIA can be prepared by desktop studies aiming to collect secondary data and an impact assessment is not required for the EIAs.
Stakeholder Engagement	Partially yes, but it is not required to make regular project information disclosure. An official “Public Participation Meeting” organized by the Ministry is the only obligatory stakeholder meeting and more meetings are not required.

TABLE 4. COMPARISON OF DISCLOSURE REQUIREMENTS

Timing	WB requirements		Turkish requirement*
	Category A	Category B	
Shortly after screening	<ul style="list-style-type: none"> During the first consultation, the borrower will provide summary of the objectives, description, and potential impacts of the subproject to the participants; in order to give them opportunity to make comments and give feedback about the Project. 		Participants are informed on the project. (EIA Regulation does not specify content of information to be provided.)
When draft EA is ready	<ul style="list-style-type: none"> Borrower will provide the ESIA conclusions to the participants. Borrower will make the draft ESIA publicly available and make it accessible to the project affected groups and the NGOs. 	Borrower provides to participants of public consultation meeting summary of EA conclusions and ESMP.	Central MoEU or provincial directorate makes draft EIA report available to public for comments.
When EA has been finalized	<ul style="list-style-type: none"> Borrower makes final ESIA report available at a public place accessible to project-affected groups and local NGOs. Borrower sends final English language ESIA report to WB and WB makes it publicly available (by publishing on Bank's external website). Borrower sends English-language executive summary of final ESIA report to WB for submission to WB Board of Executive Directors. 	Borrower sends final English and Turkish language EA report to WB and WB makes it publicly available (by publishing on Bank's external website).	Governorate informs public on the result of MoEU's evaluation of the EIA report and justification

* For projects that are subject to EIA.

2.5 Application of the Turkish EIA Regulation and WB Safeguards Policies

The WB has a Policies and Procedures Framework which provides a structure for developing and managing policy, procedure, directives and guidance type documents aiming to:

- organize documents in a more efficient and user-friendly manner;
- clarify responsibility for sponsoring, approving and managing them;
- improve communications to staff about revisions and new P&P Documents; and
- provide easy access by placing all documents in a single, fully searchable repository

Within the scope of this Project the operational policies listed below will be considered and details regarding these policies are presented in **Error! Reference source not found..**

Under the WB Environmental Assessment system (OP. 4.01), projects are classified as Category A, Category B or Category C depending upon estimated potential environmental risk. Unlike the WB categorization system, Turkish EIA regulation (same as EU EIA Directives) indicates threshold based project descriptions through Annexes. One of the main differences between two environmental processes (WB EA and Turkish EIA policies) can be seen in screening system of the projects. The differences between the Turkish EIA procedure and WB's Operational Policy for Environmental Assessment (OP. 4.01) can be seen in Table 2, 3 and 4.

Since the screening systems differ when compared to national EIA regulation, it is not technically very easy to cross-match the project screening among national and WB system. For example, it cannot be assumed that Annex I under the national system equates directly with WB Category A or Annex II with Category B. The differences in the two systems may arise, and it is possible for some Annex I projects to be considered Category B, or conversely, some Annex II projects to be considered Category A if for example they are planned in sensitive areas. Likewise, some No Annex projects may be screened as Category B especially if they could lead to modest negative impacts to the human or natural environment and the impacts confined to a small region and are temporary or short-lived and these impacts are easy and inexpensive to control (e.g. most of the construction activities).

In order to avoid repeating the same steps for both procedures, the Project will be carried out to meet the WB OP 4.01 requirements that are not contained in the Turkish EIA or PIF, but are required by the WB will be prepared in the form of "supplementary documents" (which can also include social assessment) to the Turkish EIA.

Required documentation for ESIA/EA process presented in this ESMF can vary project to project depending on project characteristics. In that respect, ILBANK will ensure that the ESIAs, partial ESIAs, ESMPs and documents presented to WB and publicly disclosed are prepared specific to proposed project.

3 ENVIRONMENTAL AND SOCIAL MANAGEMENT PROCESS

A certain process needs to be followed to determine the environmental and social aspects of sub-project activities. The stages of this process are defined below. A detailed overview of ILBANK's capacity in environmental and social management and assessment of the FI's labor and working conditions are explained in Annex 8.

Step 1: Screening

ILBANK, in consultation with WB, will carry out the screening of sub-projects. This process will cover an ineligibility assessment and environmental and social categorization of a subproject in line with OP 4.01. ILBANK will additionally screen each sub-project according to the other Bank policies stated under Section 2.3 above and share the findings through ESIA/ESMPs and LARAPs as required. ILBANK

Outcomes of the Turkish EIA Process is another source to identify the impact significance of the project as well as to identify the sensitivity level of Project Area of the Influence (e.g. presence of natural habitats, projected areas etc.). In this process, ILBANK may ask consultants preparing the sub-project feasibility reports to carry out an initial assessment of these risks to reach more informed decisions.

ILBANK will also guide the municipality regarding the environmental and social assessment document to be provided (as detailed in Chapter 5 of this document).

ILBANK will submit to WB for clearance the proposed screening categories for the sub-projects. The information submitted to the WB for this purpose will include the proposed screening category and the key environmental and social issues to be analyzed together with information substantiating the category selection.

In cases where several separate investments (components) constitute a subproject, the highest category among the components will apply to the subproject. For instance, a subproject may include a wastewater treatment investment (Category A) and water distribution network rehabilitation (Category B). In this case, the subproject is classified as Category A. Ideally, the EA carried out in a sub-project should combine all the components to be implemented under the subproject since this will generate a comprehensive overview on the environmental impact. However, the EAs of the activities may be prepared separately and works may commence at separate times as long as the components are independent of each other in terms of impact on the environment. When in doubt, ILBANK will consult with the WB Environmental and Social Specialist assigned to the project.

Step 2: Environmental and Social Assessment

The type and content of the environmental and social assessment that fulfill WB OP 4.01 will depend on the category and special issues associated with the project as discussed above. A large part of the information and analysis is likely already available in the EIA or PIF document if the proposed sub-project is classified as either an Annex I or and Annex II project according to the Turkish EIA Regulation. Then, according to the category of the sub-project

the Turkish PIFs and EIAs will be used to prepare an ESIA (for Cat As), partial ESIAs (for Cat high Bs) and ESMPs (for Cat low Bs). Completing a satisfactory ESMP/EA is the municipalities' responsibility. They may fund the cost of the ESMP either from the municipality's own resources or from the subproject loan.

ILBANK will perform an overall quality assurance function that the documents prepared meet WB requirements. In reviewing an ESMP, ILBANK will also confirm that it is clear, feasible and appropriate.

Step 3: Public Consultation

Category A Subprojects

In the case of Category A projects, the number and content of public consultations will depend on whether a Turkish EIA was carried out and the compatibility of the Turkish EIA report with WB requirements. If a Turkish EIA was not carried out, at least two public consultation meetings will be carried out, namely one to discuss the TOR and a second one to discuss the draft ESIA report.

In cases where the Turkish EIA has major information gaps relative to WB requirements (see discussion under "Step 2: Environmental and Social Assessment"), also at least two public consultation meetings will be held. The first meeting will be on the EIA TORs for the proposed supplementary documents. The second meeting will be held when the supplementary EA documents are in draft form; at this meeting both the draft supplementary documents and the Turkish EIA will be discussed. In contrast, in cases where the information gap between the Turkish EIA and the WB requirements is minor (also see discussion under "Step 2: Environmental and Social Assessment"), a public consultation meeting will be carried out when the draft supplementary documents are available and discuss the entire WB ESIA package and LARAP (if any).

Category B Subprojects

A public consultation meeting will be held for Category B sub-projects at the draft EA stage whether or not PIF is available. This is because the Turkish EIA Regulation does not require public consultation for projects that are not subject to EIA whereas WB policy requires at least one consultation meeting.

Public consultations will be widely announced at least two weeks using local newspapers and other local means of information dissemination that are known to be effective. For both Category A and B projects, the municipality will ensure that draft EIAs, ESMPs, LARAPs and other assessment or supplementary documents are available in public places and meeting announcement will point out the location. The minutes of public meetings will be recorded and included in the draft and final EIAs for Category A subprojects, final WB EA documents (ESMP and assessment of local environmental issue where applicable) for Category B subprojects. Annex 3 provides a table of contents for the public consultation documentation.

Step 4: World Bank Clearance

The WB will provide prior review and approval to all projects required by Turkish regulation to prepare an EIA and/or assigned "Category A" in accordance with WB procedures before a final decision to fund the subproject can be taken by ILBANK. Category B subprojects will

also be subject to prior review and approval of the Bank. During the implementation of the project, Bank can mutually agree with Ilbank that, Ilbank conducts prior review to the environmental and social assessment documents to low risk Category B projects (rehabilitation of water or sewer network systems, renovation of existing municipal structures -except the ones having any degree of protection, cultural importance or the ones located in natural habitats-, etc.) and WB conducts post review.

Step 5: Incorporation in Works Contracts

Sub-loan agreement must include requirement to implement the ESMP and LARAP (if any). For both Category A and Category B projects, the ESMP and LARAP will also be attached to the procurement documents and be part of the contract with the contractor selected to carry out the subproject works. These sections include potential impacts that may occur during the set of works in question and measures that the contractor needs to take to mitigate them.

Step 6: Information Disclosure

For both Category A and B projects, the municipality will ensure that hard copies of the final Turkish language WB ESIA, ESMPs and LARAPs are available in public place³. ILBANK will post the final documents on its website. In case of Category A subprojects and the first two Category B subprojects disclosure in Turkey must be complete before WB can provide the 'no objection' to its financing. In addition, the final ESIA report and final LARAP (if any) for Category A projects should be disclosed to public during the second public participation meeting.

Prior to subproject approval, ILBANK will also submit English versions of the final WB ESIA, ESMP and LARAP documents to the WB for posting on its external website. In case of Category A subprojects, 30 days prior to subproject approval, ILBANK will submit the English language executive summary of the ESIA reports to WB Board. And the full ESIA will also be submitted to WB's Board during 33 project implementation.

Step 7: Supervision and Monitoring

ILBANK will carry out regular supervision of subprojects during construction and operation to ensure that the ESIA, ESMPs and LARAPs are being duly carried out. When ILBANK notices any problems in ESIA, ESMP or LARAP implementation it will inform the relevant municipality and agree with them on steps to rectify these problems. Specifically for any significant environmental or social incidents (e.g. fatalities, lost time incidents, environmental spills etc.), the municipalities will inform ILBANK in 3 business days, and ILBANK will inform the Bank about the incident as soon as they are informed. The incident report including root cause analysis, precautions and compensation measures taken, will be submitted to ILBANK in 30 business days and ILBANK will forward the incident report to the Bank. ILBANK will report its findings to the WB in its biannual project progress report or more frequently, as needed to bring issues to the attention of the WB. The WB project team will on occasion, and as required, also visit project sites as part of project supervision.

³ "WB ESIA and ESMPs" means original Turkish EIA and gap-filling supplementary documents.

4 ANTICIPATED ENVIRONMENTAL AND SOCIAL IMPACTS

Since the sub projects are still unknown, the environmental and social impacts of the Project cannot be foreseen yet. However, an anticipated list of risks and impacts by category (a primary set which is not limited to the below) is provided according to the potential sectoral investments provided in Annex 4.

1. Impacts on Physical Environment
 - Air quality
 - Odor
 - Climate change
 - Noise and vibration
 - Natural resources and habitats
 - Wastes
2. Impacts on Biological Environment
 - Protected areas
 - Landscape
3. Impacts on Socio-Economic Environment
 - Livelihoods and businesses
 - Land and other assets
 - Access to services
 - Local procurement
 - Employment
 - Community health and safety
 - Traffic
 - Vulnerable groups
 - Cultural heritage
4. Impacts on Labor and Working Conditions
 - Working conditions and worker management
 - Occupational health and safety
 - Labor Influx⁴
 - Child Labor
 - Gender based violence⁵ (GBV)
 - Equal opportunity

⁴ Not all sub-projects may have labor influx issues. Labor influx pertains to social risks that might be encountered from long term accommodation of workers on camp sites established on site for the construction of investments.

⁵ Sub projects will identify and address gender gaps, if any. Any information on identification of the initial risks for GBV, corresponding service providers and shelters as well as channels of reporting GBV complaints will be reported in project specific ESIA/ESMPs and SEPs. Based on findings, sub project GRMs will be established accordingly to allow for cases of GBV to be recorded and addressed.

5 ENVIRONMENTAL AND SOCIAL MONITORING AND GRIEVANCE MECHANISM

5.1 Environmental and Social Monitoring

According to the above mentioned anticipated risks and impacts municipalities will monitor the environmental and social impacts of their Project activities on a regular basis.

The environmental and social issues included within the mitigation measures will also be monitored and supervised by the appointed specialists through ILBANK. Although the environmental and social impacts are expected to be low, the potential negative environmental impacts are planned to be prevented or mitigated during the construction and operation stages.

Environmental and social monitoring system starts from the implementation phase of the project thorough the operation phase in order to prevent negative impacts of the project and observe the effectiveness of mitigation measures. This system ables the WB and the borrower to evaluate the success of mitigation as part of project supervision, and allows to take an action when needed.

The monitoring system provides,

- Technical assistance and supervision when needed,
- Early detection of conditions related to particular mitigation measures,
- Follow up on mitigation results,
- Provide information of the project progress.

5.2 Grievance Mechanism

The Grievance Mechanism is a process that enables any stakeholder to make a complaint or a suggestion about the way a project is being planned, constructed or implemented. The municipality will establish a transparent and comprehensive Grievance Mechanism before the implementation of the project in order to receive and resolve the affected communities concerns, queries, complaints and grievances about the environmental and social aspects of the project.

Some different forms public announcement tools to be used for the establishment of the Grievance Mechanism includes;

- Distribution of leaflets to the public places
- Notice Boards
- Website
- Telecommunication Tools
- Public Meetings

The Grievance Mechanism⁶ (sometimes also called Grievance Procedure) will be prepared according to existing EIA and WB policies, procedures, laws and regulations.

The project tackles core municipal investments and services such as water, wastewater, transport and some basic energy facilities that citizens expect municipalities to provide. A grievance redressal and feedback mechanism for the SCP II AF will be set up to ensure that beneficiary feedback and grievances are addressed by a three-level in-country mechanism consisted of municipalities/utilities, ILBANK and its PMU, and Responsible Court of First Instance and that the actions taken are reported publically to ensure transparency and accountability. All the municipalities/utilities in Turkey have 'White Tables' which are active GRMs for tracking grievances, both online and through a toll-free number.

The SCP 2 AF aims to improve the current 'White Table' mechanism in the municipalities/utilities by identifying grievances/feedback related to the sub-investments under the project. Any grievance related to a sub-investment financed under the SCP 2 AF will be first logged at the municipality/utility level and will be addressed by the PIU satisfactorily within a certain period. If the complainant is not satisfied with the complaint resolution, then the case will be submitted to further levels. There will be a toll-free number and online and SMS channels available for citizens to submit grievances through the 'White Table' system regarding the SCP-related grievances.

Although there is no obligation, a Public Grievance Form and Grievance Close out Form (See Annex 6) has been prepared for convenience. The selected municipalities will collect all complaints and concerns through the White Table system to achieve and attempt to solve or mitigate related issues within a reasonable timeframe. The municipalities should report the statistics of grievances to the ILBANK.

The received complaints/comments will be resolved in a certain period of time as it is set forth in the national law and White Table System of the relevant Municipality.

⁶ Municipalities establish the Grievance Mechanism through the White Table system.

5.3 The White Table System

All municipalities adopted a service called *Beyaz Masa* (“White Table” in English) in Turkey to collect feedback from citizens. This municipal department was established to collect all the complaints and requests of the local residents and aims to provide possible solutions within the municipal structure for the requested concerns.

Although the White Table system is not considered as a grievance mechanism, it is still acknowledged as a general complaint mechanism that the municipalities adopted within their structure. Therefore, the White Table system can be either proceeded as the actual or additional complaint mechanism for the selected projects since the selected projects are already within the municipality structure.

Citizens can access the White Table by calling the Call Center (Alo 153), internet page or in person. There will be a tracking number given for each comment/complaint that allows following up the status of the report. Alo 153 Call Center intends to provide better quality assistance and faster solutions for concerned residents through the White Table solutions team. There is also an internet page of municipalities which includes a White Table section that allows the residents to contact public relations experts electronically. Also, the residents can apply their requests in person for an instant solution.

The White Table system provides data management through the feedback of the citizens, however due to some organizational barriers (lack of specific departments and personnel); the system may disable itself to address the received concern/comments. Therefore, this system will be improved as mentioned above and will be tailored for recording only the SCP based grievances.

6 REPORTING TO THE WORLD BANK

In its biannual project progress reports, ILBANK will include a section titled “Environmental and Social Safeguards” which will summarize the status of ESMP implementation based on its monitoring activities. Any projects that may involve land take and which have prepared a LARAP will also be monitored and updates on LARAP implementation can be included in the biannual progress reports or submitted separately in semi annual periods. The report will highlight any issues arising from non-compliance and how it has been/is being addressed and from the environmental and social safeguards point of view. The biannual reports will also include any stakeholder engagement activities carried out along with a summary of all grievances received during that reporting period.

ILBANK will also maintain an EA status table titled “Environmental and Social Assessment Status of Project Components by Municipality”. The table will include information on the WB EA category, review of the EA TOR by ILBANK, consultant hiring, public consultation meetings, status (drafting, revision and finalization) of the EA report. ILBANK will share this document with the WB upon request.

7 INSTITUTIONAL ARRANGEMENTS

Key actors in the implementation of this framework are the ILBANK Project Management Unit (PMU) and project proponent municipalities. In the following the overall roles and capacities of these actors are discussed. The summary of roles and responsibilities is listed in Table 5.

7.1 ILBANK PMU

ILBANK PMU will continue to include an environmental and social specialist to coordinate the implementation of the Environmental and Social Management Framework. The Environmental and Social Specialist’s responsibilities will be as follows:

- Carry out screening of the subprojects with regard to EA categorization according to WB requirements.
- Provide municipality EA consultants guidance on preparation of Category A and Category B EA documents in accordance with WB requirements.
- Provide municipality officials/municipality EA consultants with guidance on WB EA procedures, notably consultation and disclosure requirements for Category A and Category B projects.
- Provide municipality officials/municipality EA consultants with guidance on WB safeguard requirements (documentation and procedures) for cultural properties, natural habitats, forests, and international waterways.
- Review EA documentation, provide written comments to municipality EA consultants, ultimately provide formal approval of EA documentation and procedures in accordance with WB safeguard requirements.
- Ensure that sub-loan documentation includes agreements to implement the ESMP and any other environment or social safeguard requirements.

- Perform supervision of ESMP implementation by the municipality and document performance, recommendations and any further actions required as part of overall project supervision reporting to the WB.
- Be open to comments from affected groups and local environmental authorities regarding environmental aspects of subproject implementation. Meet with these groups during site visits, as necessary.
- Coordinate and liaise with WB supervision missions regarding environmental safeguard aspects of subproject implementation.

7.2 Municipalities

The EA work to be prepared by the municipalities will be mainly conducted by consulting companies of which there is an adequate number in Turkey. Municipalities have been carrying out infrastructure investments and are familiar with Turkish environmental legislation and construction procedures. However, knowledge of WB requirements is less common. To help build improve capacity in this regard, ILBANK will organize training workshops to familiarize municipalities and their potential consultants with WB safeguard policies, as new municipalities join the project.

The municipalities generally have the capacity to properly implement ESMPs (for both Category A and B) during the construction and operational phases. Where such capacity is lacking⁷, the municipalities will retain environmental specialist consultants to assist them in supervising the works carried out by the contractor and ensuring that the ESMP is followed adequately. Furthermore, the project may provide institutional strengthening to municipalities through additional training or acquisition of equipment, as needed.

TABLE 5. ROLES AND RESPONSIBILITIES

	Municipalities	ILBANK	WB
Financial Roles	Requestor	Financial intermediary	Main finance source
Application Process	Submit Demand Based Applications	Review / analyze the applications in order to provide information to WB	Concur the final selection of eight participating municipalities.
Preparation Process	Welcome and apply the relevant laws and regulations that are introduced by WB through ILBANK	Coordinate the selected municipalities to ensure all the relevant rules and regulations will be adopted throughout the project Organize internal working structure for the investment options	Assist ILBANK in Developing Performance and Monitoring Database system during the preparation phase Provide technical guide for ILBANK
Number of Staff	One Social and One Environmental Expert	In addition to present team, a support team can be established. Structure of the team	Assist ILBANK in establishing monitoring team.

⁷ The capacity of the participating municipalities will be done by the PIU (ILBANK) in close collaboration with WB.

	Municipalities	ILBANK	WB
		and qualification of team members will be defined by ILBANK and WB. Individual freelance consultants can be employed.	
Project Roles	Preparation of ESIA, ESMP and Grievance Mechanism	The main responsible for monitoring ESIA, ESMP and Grievance process	Overall review of the project development stages
	Tendering all the project works and consulting services	Supervise and monitor the whole process to ensure the proper application of the WB's environmental and social safeguard policies are applied.	Review of incoming reports to see the Bank standards are in progress

8 PUBLIC CONSULTATION

All sub-projects will be required to prepare a Stakeholder Engagement Plan (SEP) in order to define sub project specific stakeholders and engagement activities and tools that the borrowing municipality employ to involve the active participation of stakeholders. In order to guide the municipalities in preparation of sub Project specific SEPs, ILBANK has prepared a Stakeholder Engagement Framework document presented in Annex 5.

Up to date, ILBANK has already conducted a public consultation meeting on March 27, 2019 in order to introduce the SCP II AF Project and its relevant safeguards documents including this ESMF.

The stakeholder Participation Meeting has been conducted on March 27, 2019 and the following institutions were invited:

- General Directorate of Land Registry and Cadaster
- General Directorate of Local Administrations
- Union of Municipalities
- General Directorate of Environmental Impact Assessment , Permitting and Inspection
- General Directorate of National Estate

Among the invited parties, Environmental Impact Assessment, Permitting and Inspection General Directorate did not attend to the meeting.

In the Stakeholder Engagement Meeting, “Environmental and Social Management Framework (ESMF)” which has been prepared in line with WB OP 4.01 and Turkish Regulation and “Land Acquisition and Resettlement Framework (LARPF)” which has been prepared in line with WB OP 4.12 were discussed. At the end of the meeting, question and answer session was held. Participants list and minutes are prepared for the meeting and is presented in Annex 7.

ANNEXES

ANNEX 1. SUGGESTED FORMATS

Annex 1A. Environmental and Social Impact Assessment (ESIA) Report for a Category A Project

An Environmental and Social Impact Assessment (ESIA) report for a Category A project focuses on the significant environmental and social issues of a project. The report's scope and level of detail should be commensurate with the project's potential impacts. The report and the executive summary submitted to the Bank are prepared in English.

The EA report should include the following items (not necessarily in the order shown):

- (a) *Executive summary.* Concisely discusses significant findings and recommended actions.
- (b) *Policy, legal, and administrative framework.* Discusses the policy, legal, and administrative framework within which the ESIA is carried out. Explains the environmental and social requirements of any cofinanciers. Identifies relevant international environmental agreements to which the country is a party.
- (c) *Project description.* Concisely describes the proposed project and its geographic, ecological, social, and temporal context, including any supporting infrastructure that may be required (e.g., dedicated pipelines, access roads, power plants, water supply, housing, and raw material and product storage facilities). Indicates the need for any resettlement plan or indigenous peoples development plan (see also subpara. (h)(v) below). Normally includes a map showing the project site and the project's area of influence.
- (d) *Baseline data.* Assesses the dimensions of the study area and describes relevant physical, biological, and, socioeconomic conditions, including any changes anticipated before the project commences. Also takes into account current and proposed development activities within the project area but not directly connected to the project. Data should be relevant to decisions about project location, design, operation, or mitigatory measures. The section indicates the accuracy, reliability, and sources of the data.
- (e) *Environmental and Social impacts.* Predicts and assesses the project's likely positive and negative impacts, in quantitative terms to the extent possible. Identifies mitigation measures and any residual negative impacts that cannot be mitigated. Explores opportunities for environmental and social enhancement. Identifies and estimates the extent and quality of available data, key data gaps, and uncertainties associated with predictions, and specifies topics that do not require further attention.
- (f) *Analysis of alternatives.* Systematically compares feasible alternatives to the proposed project site, technology, design, and operation - including the "without project situation" - in terms of their potential environmental impacts; the feasibility of mitigating these impacts; their capital and recurrent costs; their suitability under local conditions; and their institutional, training, and monitoring requirements. For each of the alternatives, quantifies the environmental and social impacts to the extent possible, and attaches economic values where feasible. States the basis for selecting the particular project design proposed and justifies recommended emission levels and approaches to pollution prevention and abatement.

(g) *Environmental and Social Management Plan (ESMP)*. Covers mitigation measures, monitoring, and institutional strengthening; see outline in [OP 4.01, Annex C](#).

(h) *Appendices*

- (i) List of EA report preparers - individuals and organizations.
- (ii) References, written materials both published and unpublished, used in study preparation.
- (iii) Record of interagency and consultation meetings, including consultations for obtaining the informed views of the affected people and local nongovernmental organizations (NGOs). The record specifies any means other than consultations (e.g., surveys) that were used to obtain the views of affected groups and local NGOs.
- (iv) Tables presenting the relevant data referred to or summarized in the main text.
- (v) List of associated reports (e.g., resettlement plan or indigenous peoples development plan).

Annex 1B. Environmental and Social Management Plan

(a) Responsible Party: The authors who prepared the ESMP along with the date of preparation.

(b) Project Description: Present a brief description of the subproject. Include the nature of the investment, the location, and any characteristics of the area that are of particular interest (e.g. near a protected area, area of cultural or historical interest). Also, include a brief description of the socio-economic conditions in the area. One or more simple maps showing project location and relevant neighboring features should be included unless there is compelling reason not to.

(c) Mitigation Plan: This should include a description of the steps to be taken to mitigate the major potential impacts on land, water, air and other media as well as possible socio-economic impacts during the planning, design, construction and operation phases and specify cost estimates and institutional responsibilities. Particular attention should be paid to the specification of emission limits (e.g. for wastewater discharge) and design standards (e.g. for solid waste disposal sites), land requirements and how these compare to Turkish laws (which at a minimum must be met) and any other relevant guidelines such as those in directives of the European Union or limits suggested by the WB Group Environment, Health and Safety Guidelines or other relevant international norms.

(d) Monitoring Plan: This should include a description of the key parameters to be monitored (including monitoring locations, schedules and responsible entities) to ensure that the construction and operation of the project is in conformance with Turkish law and other relevant norms and standards. If such details are covered by permits or construction or monitoring contracts these can be referenced as attachments.

(e) Institutional Arrangements: There should be a narrative discussion briefly presenting how the monitoring data is going to be used for sound environmental and social performance - who collects the data, who analyzes it, who prepares reports, who are the reports sent to and how often, what is done by the responsible authorities after they receive the information; and how is non-compliance with the ESMP treated.

(f) Consultations with Affected Groups and Non-governmental Organizations: The following should be included:

- Date(s) of consultation(s);
- Location of consultation(s);
- Details on attendees (as appropriate)
- Meeting Program/Schedule: What is to be presented and by whom;
- Summary Meeting Minutes (Comments, Questions and Response by Presenters)
- Agreed actions.

ANNEX 2. SAMPLE IMPACT, MITIGATION AND MONITORING TABLES (TO BE INTEGRATED IN ESIA's, partial ESIA's and ESMP's)

Please note that these sample tables are prepared just for a guidance. Most of the safeguard issues presented in these sample tables are relevant to wastewater treatment plant type of investment. Moreover, the impacts, mitigation measures and monitoring arrangements are not fully listed and should be presented according to sub-project's specific details when tailored for sub-project environmental and social assessment documents.

Mitigation Plan

Phase	Issue	Mitigation Measures	Costs	Institutional Responsibility
Construction	Interruptions in transport	Positioning clear warning and information signs around the construction zone. Imposing time constraints (e.g. 7AM to 5 PM) for works. Locating and marking alternative roads (roundabouts)	Included in construction costs	Contractor
Construction	Transport safety	Positioning clear warning and information signs around the construction zone. Imposing time constraints for works. Considering disabled, women, children and people with special needs while locating and marking alternative roads (roundabouts)	Included in construction costs	Contractor
Construction	Dust	Close or cover trucks for the transport of materials. Throwing water on the ground where dust is generated, disposing of excess material and cleaning the location upon the finalization of works. Protective covers or curtains for zone where the largest amounts of dust are generated.	Included in construction costs	Contractor
Construction	Noise and Vibrations	Imposing time constraints for works (works in the course of daytime (e.g. 7AM to 5 PM). Establish schedules and/or other forms of specific limitations for works	Included in construction costs	Contractor

Phase	Issue	Mitigation Measures	Costs	Institutional Responsibility
Construction	Exhaust gases from equipment/air quality	Imposing time constraints for works (e.g. 7AM to 5 PM).	Insignificant	Contractor
Construction	Spill outs of fuel, lubricant, antifreeze etc. in the course of performance of works may result in the pollution of ground, surface and subterranean water.	Periodic examination of the condition of vehicles and other machinery and equipment used in the course of the performance of works. Compliant warehousing of fuel and lubricant, and in case of a spill out, isolation and cleaning of the location.	Included in construction costs	Contractor
Construction	Damage to trees and vegetation may onset in the course of construction	Minimizing the areas requiring the removal of vegetation, and upon finalization of works, replace/restore removed vegetation. Special measures if needed to avoid damage to protected trees or species.	Included in construction costs	Contractor
Construction	Deposit of excavated soil, erosion, landslides or sedimentation may occur.	Depositing all excess excavated material in a compliant manner into a carefully selected landfill determined by relevant municipal bodies for utility affairs.	Included in construction costs	Contractor
Construction	There is a possibility of discovering artifacts or other cultural and historical items of value	Discontinuing all works. Contact responsible authorities. Organizing all necessary measures to protect the location. No works to proceed until official notification is received	No costs involved	Contractor
Construction	Periodic interruptions in water supply to neighboring population	Scheduling interruptions in water supply in cooperation with the Water Supply Company and informing the population with the objective of minimizing the negative effect on the population	Included in construction costs	Contractor and Water Supply Company

Phase	Issue	Mitigation Measures	Costs	Institutional Responsibility
Construction	Excavated and removed material is harmful to environment if it is not disposed of adequately. Especially if the material or waste is dangerous or might be dangerous (such as, for example, asbestos and cement pipes, pieces of profiles etc)	All non-dangerous waste and excavated material generated in the course of construction has to be deposited in the landfill and in a manner that is not harmful to the environment. Stone, soil and other materials that may be reused shall be utilized in the procedure of project realization. Materials that cannot be used and dangerous waste should be removed in compliance with entity level regulations.	Included in construction costs	Contractor Relevant inspection services
Construction	Access to common resources or services may be interrupted due to construction works	Time schedule for all construction works should be communicated with local communities prior to construction. Alternative and secure means to access resources and services should be introduced.	Included construction costs	Contractor
Construction / Operation	Identification of vulnerable groups impacted by the subprojects	<p>Certain groups that may be considered vulnerable (people with disabilities, waste pickers, elderly, refugees, certain groups with livelihood dependencies in the project region) should be identified. There engagement in project planning and implementation should be ensured through consultations.</p> <p>Certain vulnerable groups (ie. Waste pickers) might be earning income from the project affected area/land. Ensure that they are informed about the project and can continue to generate income.</p>	Included in construction costs	Municipality

Phase	Issue	Mitigation Measures	Costs	Institutional Responsibility
Construction / Operation	Involuntary Resettlement / Negative impacts on livelihoods of project affected people	<p>Design works to minimize the involuntary land take</p> <p>Preparation of a Resettlement Action Plan</p> <p>Compensate losses resulted from involuntary resettlement</p> <p>Additional income restoration measures through livelihood restoration plans. Due to change in mean of transport or modernization in transport, a certain group who generate income from that particular mean of transport might be negatively impacted and lose jobs. Job replacement benefits or other livelihood restoration options (training, alternative job arrangements etc) should be offered/if there are people with special needs (elderly, women, children etc) or disabled who could be negatively impacted from the construction ensure the temporary measures for accessibility is sustained)</p>	Included in construction costs	Municipality
Construction	Labor Influx (Not all subprojects may have labor influx issues, however projects with long term construction Works will require camps sites to be established to accomodate workers. Conflicts may arise between communities and workers)	For subprojects that may have labor influx issues, camp sites should be arranged to properly accomodate workers and meet thier needs within the camp site. Workers must be provided with relevant trainings as needed.	Included in construction costs	Municipality
Construction	Gender Based Violence	Information on GBV risks should be shared during public consultations. Project GRM should be designed to receive GBV grievances anonymously, and addressed in a confidential manner. Relevant Project staff should be trained in order to refer GBV survivors to existing, identified service providers and ensure that they are provided services promptly.		

Phase	Issue	Mitigation Measures	Costs	Institutional Responsibility
Construction	Occupational health and safety. Construction works can cause accidents that may threaten the health and safety of workers if measures are not taken.	The workers shall be informed about job descriptions, responsibilities and risks about OHS. The workers will be provided with the necessary personal protective equipment and information on works and occupational safety through regular trainings. Before the construction works starts, a Risk Assessment Report shall be prepared for all works to be carried out and necessary measures shall be taken to avoid related risks. "Emergency Response Plans" shall be prepared for a possible accident and emergency and emergency teams shall be established and drills and training shall be carried out in line with the emergency scenarios.	Included in construction costs	Contractor/ Municipality
Construction	Community health and safety	The construction area should be fenced to prevent trespassing. Necessary signage and lighting equipment shall be established. Traffic safety shall be established through appropriate management measures. Community should be informed about transfer of large machinery and equipment. If necessary, emergency drills should be implemented with the participation of the emergency authorities in the area. Design and the construction works of the projects should be in line with the WBG guidelines including the life and fire safety provisions.	Included in construction costs	Contractor/ Municipality
Operations	Poor operation may result in inadequate water quality released to the general population	Establish emergency procedures for notification and alerting the public	Included in the operating costs	Operator of the water treatment plant
Operations	Environment safety hazards from chlorine storage and use	Establish continuous chlorination control and monitoring, chlorination equipment maintenance procedures, storage procedures, and emergency response procedures. Chlorination plant should have ambient monitoring and locked. Accessible only to authorized staff.	Included in the operating costs	Operator of the water treatment plant

Phase	Issue	Mitigation Measures	Costs	Institutional Responsibility
Operations	Chlorine and other process chemicals leaks and spills	Establish safe delivery/storage/handling procedures in accordance with material safety data sheets (MSDSs). Immediately contain and cleanup any spilled material.	Included in the operating costs	Operator of the water treatment plant
Operations	Process sludge (filtration and flocculation processes) and wastewaters from equipment cleaning	Sludge to be disposed in site approved by municipality. Wastewaters discharged into municipal wastewater collection system	Included in the operating costs	Operator of the water treatment plant
Operations	Occupational health and safety	The workers shall be informed about job descriptions, responsibilities and risks about OHS. The workers will be provided with the necessary personal protective equipment and information on works and occupational safety through regular trainings. "Emergency Response Plans" shall be prepared for a possible accident and emergency, and emergency teams shall be established and drills and training shall be carried out in line with the emergency scenarios.	Included in the operating costs	Operator of the water treatment plant
Operations	Community health and safety	The operations should be engaged without posing risk to the community safety. The facility should be fenced to prevent trespassing. If necessary, emergency drills should be implemented with the participation of the emergency authorities in the area.	Included in the operating costs	Operator of the water treatment plant

Monitoring Plan

Phase	Which parameters shall be monitored	Where shall the parameters be monitored	How shall the parameters be monitored	When shall the parameters be monitored	Costs	Responsibility
Construction	Interruptions of transport, transport safety and to common resources or services	On the location and around the location	According to complaints of the population in the vicinity or transport participants	On the weekly basis in the course of works	Included in construction costs	Contractor, Regulatory body
Construction	Dust generation	On the location and around the location	Visually, on the basis of irritation of the breathing system, complaints of the population in the vicinity	On the weekly basis in the course of works	Included in construction costs	Contractor, Regulatory body
Construction	Unpleasant effects of noise, vibration and exhaust gasses	On the location and around the location	By listening, complaints of the population in the vicinity and workers	On the weekly basis in the course of works	Included in construction costs	Contractor, Regulatory body
Construction	Spill outs of fuel, lubricant, antifreeze etc	Below and around the place where materials are stored and used. Near the vehicles and around the vehicles	Visual examination to determine the spill out	On the daily basis in the course of works	Included in construction costs	Contractor, Regulatory body
Construction	Reductions in air quality levels by emissions from mechanization	On the location and around the location	Visually, on the basis of irritation of the breathing system, complaints of workers and the population in the vicinity	On the weekly basis in the course of works	Included in construction costs	Contractor, Regulatory body
Construction	Removal of vegetation and subsequent replanting of the area	On the location and around the location	Visually in the course of works, examination and photographing before and after the works	Before and after the works on construction	Included in construction costs	Contractor, Regulatory body

Phase	Which parameters shall be monitored	Where shall the parameters be monitored	How shall the parameters be monitored	When shall the parameters be monitored	Costs	Responsibility
Construction	Changes on the ground, erosion, as a consequence of excavation and depositing of materials	On the location	Visually, geotechnical examinations	Before the initiation of works and in the course of works	Included in construction costs	Contractor, Regulatory body
Construction	Discovery of artifacts and other items of cultural and historical value	On the location and around the location	Visually in the course of works, minutes from construction site	On the daily basis in the course of works	No costs involved	Contractor, Regulatory body
Construction	Periodic interruptions in water supply	On the location and throughout the water supply system	Public information, on the basis of minutes.	On the daily basis in the course of works	No costs involved	Contractor, Regulatory body, Water Supply Company
Construction	Excavated and removed material disposal practices. Especially if the material or waste is dangerous or might be dangerous (such as asbestos and cement pipes)	Demolition/ removal site, disposal site,	Visual at both locations	Weekly	No costs involved	Contractor, Water Supply Company
Construction	Labor influx issues	On the location and around the location	Complaints of the population in the vicinity and workers	Monthly	Included in construction costs	Municipality
Construction	Gender Based Violence	On the location and around the location	Complaints of women workers and other women stakeholders in Project area	Monthly	No costs involved	Contractor, Municipality
Construction	OHS risk assessment, training material (e.g. logs, presentations, attendees list etc), use of personal protective equipment (PPE), occupational health and safety (OHS) incident statistics, incident reports etc.	On the facility site	Visually, training records, incident reports, statistics etc.	Before the initiation of works and in the course of works	No additional costs	Contractor, municipality
Construction	Community safety measures	On the facility site	Visually, signage and boards, drill reports etc.	On monthly basis	No additional costs	Contractor, municipality

Phase	Which parameters shall be monitored	Where shall the parameters be monitored	How shall the parameters be monitored	When shall the parameters be monitored	Costs	Responsibility
Operations	Environment safety hazards from chlorine storage and use	Chlorine storage building	Check operation of chlorine dosing system, satisfactory operation of chlorine ambient monitoring devices	Monthly	No costs involved	Contractor, Water Supply Company
Operations	Chlorine and other process chemicals leaks and spills	Chlorine storage building, Process chemical storage area	Visual	Weekly	No costs involved	Contractor, Water Supply Company
Operation	OHS risk assessment, training material (e.g. logs, presentations, attendees list etc), use of PPE, OHS incident statistics, incident reports etc.	On the facility site	Visually, training records, incident reports, statistics etc.	Before the initiation of works and in the course of works	No additional costs	Contractor, municipality
Operation	Community safety measures	On the facility site	Visually, signage and boards, drill reports etc.	On monthly basis	No additional costs	Contractor, municipality
Construction / Operation	Engagement activities with vulnerable groups	On the location and around the location	Through records held for each engagement activity	Monthly	Included in construction and operational costs	Municipality
Construction / Operation	Cases of land acquisition and economic displacement (impacted livelihoods)	On the location and around the location	Land acquisition records, records on filed court cases, grievances received on livelihoods,	Monthly	Included in construction and operational costs	Municipality

ANNEX 3. TABLE OF CONTENTS FOR THE PUBLIC CONSULTATION DOCUMENTATION

- Manner in which notification of the consultation was announced: media(s) used, date(s), description or copy of the announcement
- Date(s) consultation(s) was (were) held
- Location(s) consultation(s) was (were) held
- Who was invited
- Name, Organization or Occupation, Telephone/Fax/e-mail number/address (home and/or office)
- Who attended
- Name, Organization or Occupation, Telephone/Fax/e-mail number/address (home and/or office)
- Meeting Program/Schedule
- What is to be presented and by whom
- Summary Meeting Minutes (Comments, Questions and Response by Presenters)
- List of decisions reached, and any actions agreed upon with schedules, deadlines and responsibilities.

ANNEX 4. POTENTIAL LIST OF SECTORS FOR AF

The Sustainable Cities Project aims to support improved sustainability (three dimensions of sustainability-environmental, economic/financial, and social) of Turkish cities and improve access to targeted municipal services in participating municipalities and utilities.

Eligible Sectors: The project finances demand-driven municipal infrastructure investments. Sectors eligible for investment include, but are not restricted to, public transport, water and wastewater, solid waste management, and energy.

Non-eligible subprojects include:

- Administrative services and facilities of political parties, trade unions, etc.
- Religious infrastructure facilities and services
- Investments in facilities with commercial characters (restaurants, conference centers, etc.) or for military or prisons
- Recreational and tourist facilities such as ski resorts, theme parks, hotels, cable cars, funiculars

Eligibility Criteria: The Law on Regulating Public Finance and Debt Management (Law No. 4749) restricts borrowing by any institution/municipality if it has overdue payments to Treasury. Investment projects have to be technically, economically and financially viable and compatible with WB's safeguards policies.

Potential Projects

Sector	Objectives (Sustainable Urban Development)	Potential Investments and Support
Water and Waste Water	<ul style="list-style-type: none"> - Promote integrated and sustainable management of water resources - Improve quality of water and wastewater service delivery, - Increase energy efficiency in water and wastewater services, - Reduce non-revenue water (NRW) - Access to safe drinking water - Protection of water resources, -Improve storm water services 	<ul style="list-style-type: none"> - New Construction/Expansion or Rehabilitation/Upgrade for Advanced Technologies of * Wastewater treatment plants (WWTPs), * Water treatment plants (WTPs), * Water transmission lines, reservoirs, distribution networks - * Wastewater and storm water networks and collectors, - Active Water Leak Detection and Pressure Management Systems, - Establishment of comprehensive Energy Management Systems for WTPs and WWTPs - Replacement of existing systems with Energy Efficient Water Pumps and Equipment (e.g. upgrading aeration blowers), establishment of automatic control systems, etc.

Sector	Objectives (Sustainable Urban Development)	Potential Investments and Support
		<ul style="list-style-type: none"> - Energy production from wastewater sludge/biogas, - Procurement of goods (e.g. water meters, vehicles, sewage channel inspection systems etc.)
Public Transport	<ul style="list-style-type: none"> - Reduce air pollution - Improve affordability and accessibility of public transport - Improve quality and performance of urban transport infrastructure and services - Better urban and public transport management - Improve road safety - improved and cleaner bus transport services 	<ul style="list-style-type: none"> - Transit Oriented Development - Metro line system and network - Light rail system and network - Ferry transport projects - Urban road rehabilitation - Promotion of alternative transport – bike paths/bike sharing, pedestrianization in city centers - Traffic management systems to improve efficiency of transport services - Municipal and City Bus Efficiency: bus system improvement and environment friendly buses - Smart transport system solutions/ big data analysis/data center/data standards for public transport data/ - Traffic Flow Optimization – Green Wave Technologies
Waste Management	<ul style="list-style-type: none"> - Promoting sustainable, safe and environmentally/socially sound management of solid waste, - Promoting integrated solutions for solid waste management, - Increase energy efficiency in solid waste services, - Improve quality of solid waste management services 	<ul style="list-style-type: none"> - Integrated waste management systems including prevention, reduction, recovery/reuse, recycling/composting of solid wastes through awareness raising and public participation activities. - Waste transfer stations (including optimization of transfer system), - Landfills, - Solid waste incineration plants, - Waste-to-Energy Systems - Procurement of goods (vehicles, equipment, etc.)
Energy	<ul style="list-style-type: none"> - Increase environment friendly energy sources - Reduce GHG emissions - Improve energy efficiency of municipal service infrastructure and models 	<ul style="list-style-type: none"> - Solar energy - Solar fields and Municipal Building Wind Turbines - Energy efficiency projects reducing energy consumption in any municipal sector - Biogas Energy Generation from WWTPs and Solid Waste facilities - Sanitary Landfill construction or expansion (or Waste to Energy Incineration)

Sector	Objectives (Sustainable Urban Development)	Potential Investments and Support
Social Services	<ul style="list-style-type: none"> - Improve quality of life and livability - Improve social inclusion in public services 	<ul style="list-style-type: none"> - Community centers (that have specialized areas for youth and women, mostly giving vocational training, psycho-social support, and also other services such as non-formal education activities—hobby courses (painting, garment etc) etc) - Houses/Shelters for Elderly (huzurevi) - Women Shelters - Neighborhood creches - Youth centers - Disabled rehabilitation centers - Kindergartens.
Disaster Risk Management	<ul style="list-style-type: none"> - Improve resilience of cities 	<ul style="list-style-type: none"> - Disaster risk management and responsiveness - Retrofitting and reconstruction of municipal and public buildings - Flood control and protection system and infrastructure - Fire-fighting services
Environment	<ul style="list-style-type: none"> - Environment clean up - Pollution reduction 	<ul style="list-style-type: none"> - Marine litter management - Plastic waste reduction - Investments necessary for implementing municipal clean air compliance (CAP) action plans
Consultancy Services and Capacity Building in all sectors above	<ul style="list-style-type: none"> - Improve institutional capacity and efficiency - Improve technical and planning capacity 	<ul style="list-style-type: none"> - Consultancy services (Supervision Consultancy) - Capacity building activities (trainings, workshops, study tours, etc.) - Planning studies, feasibility studies, technical designs, environmental and social assessments, etc. - Financial management performance and systems including own resources enhancement - IT and Management Information Systems (city data, management information systems, SCADA system, etc.) - Geographical Information Systems (Streamlining of business processes involving land/geospatial data; Designing geospatial information systems (GIS); Geospatial data management; Interoperability of GISs within Turkey's NSDI framework/services)

ANNEX 5 STAKEHOLDER ENGAGEMENT FRAMEWORK

INTRODUCTION

The Sustainable Cities program aims to support improved sustainability (three dimensions of sustainability-environmental, economic/financial, and social) of Turkish cities and improve access to targeted municipal services in participating municipalities and utilities. The project finances demand-driven municipal infrastructure investments. Under the program two projects have been financed up to now; Sustainable Cities Project I (signed December 2016) and Sustainable Cities Project II (signed May 2018).

The emergence of SCP II AF is a response to ongoing technical assistance for sustainable urban development and capital investment planning being provided under Component A of SCP I. Since the design and approval of SCP II, there has been a significant increase in demand from municipalities for investments in sustainable urban development. This exceptional demand includes identification of investments to improve public transport, water and sanitation, solid waste management, energy, environment, disaster and climate resilience and social infrastructure. The proposed AF will allow ILBANK to finance priority projects in the immediate term. It will also support ILBANK, the Government of Turkey and the World Bank to expand the sustainable cities approach both sectoral and spatially which will increase SCP's impact and development effectiveness.

The AF will follow the same structure with the SCP II:

Component A – Municipal Finance to support demand-driven municipal infrastructure investments to improve public transport, water and sanitation, solid waste management, energy, environment, disaster and climate resilience and social infrastructure. The component would finance goods, works, and non-consulting and consultant services, including the hiring of local technical consultants for engineering design and construction supervision.

Component B – Project Management which finances goods and consultancy services for project management, monitoring and evaluation, outreach and communication.

The SCP II AF will be very similar to SCP II in terms of nature of the sub-projects (investments). The target of each potential investment area is described in Table 1 below.

Table 1. Anticipated Investments Under SCP II AF

Field	Anticipated Investments
Water and Sanitation	Upgrades and rehabilitation of critical infrastructure, water leak detection and management systems, energy management systems, procurement of goods critical for quality management of water and waste water services
Public Transport	Transit orientated development, promotion of public transport services and alternative transport such as cycling, efficiency in municipal and city buses, smart transport system solutions and traffic flow optimization

Field	Anticipated Investments
Solid Waste Management	Recycling, reuse, compost etc., modern waste transfer stations, solid waste incineration plants, waste to energy systems and procurement of goods for quality and sustainable management of solid waste
Reduction in Greenhouse Gas Emissions (GHG)	Renewable energy sources (solar, wind), harnessing biogas for energy from waste water treatment plans and solid waste facilities and energy efficiency projects across municipal buildings and infrastructure
Social Inclusion	Development of recreational infrastructure and services, development of community centers including those providing specialized social services for youth, elderly, women and disabled, shelters and homes for elderly and women, and care for the very young through creches and kindergartens
Building Disaster and Climate Resilience	Retrofitting or reconstruction of fire station buildings and purchase of modern equipment for response to flood, fire, earthquake, storm and technological emergencies
Pollution	Prevention Marine litter management, reduction in plastic waste and investments need for implementing clean air compliance action (CAP) plans
Institutional Capacity	Consultancy services in project supervision; capacity development of authorities; planning, feasibility and technical designs and environmental and social assessments; IT and data management systems including city data, management systems, geospatial information systems (GIS) etc. to support technical and planning capacity at the municipal level

Currently, none of the investing municipalities and their projects are known. Thus, investment areas, location and impacts of sub-projects cannot be determined. Two framework documents; i) Environmental Social Management Framework (ESMF) and ii) Land Acquisition and Resettlement Policy Framework (LARPF) have been prepared by ILBANK in order to provide guidance to investing municipalities in defining, managing and monitoring the environmental and social impacts of their sub-projects once their investment areas are defined.

Rationale for a Stakeholder Engagement Framework (SEF)

This Stakeholder Engagement Framework (SEF) forms a part of the Environmental and Social Management Framework (ESMF) of the SCP II AF (hereinafter referred to as “the Project”).

Since sub-projects and areas of investment have not yet been determined, a SEF that outlines the engagement approach and methodology that the investing municipalities will adapt for their projects has been prepared by ILBANK. The SEF provides a framework to support the establishment of a continuous engagement process between municipalities and those who potentially would be impacted, or have any kind of interest in the Project (stakeholders). The process ensures that a sound engagement approach is set in order to increase active participation and involvement of all project stakeholders through a range of activities and tools during the entire life of the Project (design, preconstruction, construction, operation, decommissioning).

Objectives of the SEF

The goal of this SEF is to improve and facilitate decision making and create continuous dialogue with project-affected people (PAP) and other stakeholders in a timely manner, and to ensure that these groups are provided equal and sufficient opportunity to voice their opinions and concerns that may influence Project decisions. This SEF will also serve as a base for the Stakeholder Engagement Plans (SEPs) that will be prepared for each sub-project once the investments are determined.

The key objectives of the SEF can be summarized as follows:

- To establish a systematic approach to stakeholder engagement that will help municipalities identify stakeholders, and to build and maintain a constructive relationship with all identified stakeholders, especially project-affected parties
- To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance
- To promote and provide means for effective and inclusive engagement with project affected parties throughout the Project life-cycle on issues that could potentially create an impact
- To ensure that technically and culturally appropriate project information on environmental and social risks and impacts is disclosed in a timely, understandable, accessible format
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow municipalities to respond to and manage such grievances

Effective stakeholder engagement promotes a “social licence” to operate and is founded on mutual trust, respect and transparent communication between investing municipalities and its stakeholders. A well-established stakeholder engagement process improves decision making as well as increasing project performance by managing costs and risk, avoiding conflict, improving corporate policy, providing continuous feedback to management on project implementation and impacts, and managing stakeholder expectations.

STAKEHOLDER ENGAGEMENT PROCESS

Based on this SEF, municipalities will need to prepare a separate SEP for each of their sub-projects. In doing so, they will follow the below mentioned process.

Stakeholder Identification

Once the sub-projects' footprints are determined, the primary step in stakeholder engagement process will be to identify the Project's stakeholders. In identifying the stakeholders, municipalities will also determine the needs and expectations for engagement, including their priorities and objectives in relation to the Project. After the identification of stakeholders, municipalities will choose the best engagement method and tool to engage with each stakeholder.

There may be individuals and groups who may find it more difficult to participate in project activities and those who may be differentially or disproportionately affected by the Project due to their marginalized or vulnerable status. Therefore, it is important that municipalities investigate

the impacts of their sub-projects on different stakeholders. The engagement method should be tailored to each identified stakeholder ensuring their involvement in the project.

The SEP will be a living document that will be updated and revised according to changing circumstances of the sub-projects. Stakeholders identified in the design phase of a project may change during implementation and therefore will need to be updated accordingly.

Stakeholders will be identified on a continuing basis by the determination of:

- Various stakeholder categories that may be ***affected by***, or be ***interested in***, the sub-project;
- Specific individuals (including vulnerable), groups, and organizations within each of these categories taking into account:
 - The area of influence; geographical location where anticipated impacts (both positive and negative) will occur, and therefore the localities within which people and businesses could be affected
 - The nature of the impacts that could arise and therefore the types of national/local government entities, NGOs, academic and research institutions and other bodies who may have an interest in these issues

Depending on the magnitude of impact and influence of the sub-project on the stakeholders, the frequency and intensity of the engagement method will proportionally increase. Hence, it is important that the project specific SEPs are prepared in line with the available ESMF/ESMPs and/or LARPF/LARAPs to determine the level of environmental and social impacts on relevant stakeholders. These project documents will provide information on vulnerable groups (if any) such as women, elderly, disabled, refugees, seasonal workers etc. that all need to be considered during the preparation of SEPs. All engagement methods selected should be culturally acceptable and appropriate for each of the different stakeholder group targeted.

Methods for Stakeholder Engagement

A variety of engagement techniques can be utilized to engage and consult with stakeholders, as well as to gather information from and deliver information to stakeholders.

The level of impact, in addition to the needs and concerns of the stakeholders will found the basis of the tools and methods selected to engage with certain groups. Anticipated engagement methods and means of application for possible stakeholders of the Project are presented in Table 2 below. These methods and tools are generic and need to be revised accordingly once the project specific SEPs are prepared.

Table 2. Engagement Methods to be Employed Under the Project

Engagement Method	Application of the Method	Possible Stakeholder
Correspondences (Letters, Phone, Emails)	<ul style="list-style-type: none"> - Information sharing (in particular technical) on project requirements and impacts - Invitations to meetings and key events during project implementation - Arrangements for obtaining permits, licences, transfer and allocation of project land - Information and data requests that will be utilized for project implementation 	Other relevant state authorities and government officials, NGOs, local government, academia, national and local media and organisations/agencies
One-on-one meetings	<ul style="list-style-type: none"> - Information collection on an individual basis allowing to speak freely about sensitive issues - Establishing personal connections with key actors 	Representatives of relevant state authorities and government officials, NGOs, local government, academia, and organisations/agencies, contractors and consultants
Formal meetings	<ul style="list-style-type: none"> - Collective information sharing on project requirements and impacts - Receiving comments, feedback, views and perception of project from a group of high level stakeholders - Establishing relations with high level stakeholders 	Other relevant state authorities and government officials, NGOs, local government, academia, and organisations/agencies, national and local media
Public consultation meetings	<ul style="list-style-type: none"> - Information sharing (especially non-technical) to a large group of stakeholders, especially communities - Receiving comments, feedback, views and perception of project from a group of stakeholders - Collecting grievances and concerns related to the project - Establishing relations with impacted communities, and groups 	Impacted communities and groups, local NGOs, local government, businesses and organisations/agencies
Face to face interviews	<ul style="list-style-type: none"> - Baseline data collection on an individual basis with impacted PAPs - Monitoring of project environmental and social impacts and activities on an individual basis - Establishing relations on an individual basis 	Project affected people, workers

Engagement Method	Application of the Method	Possible Stakeholder
Focus group discussions	<ul style="list-style-type: none"> - Information sharing on a specific topic to a certain group of people including vulnerable groups - Receiving comments, feedback, views and perception of project from a certain group - Collecting grievances and concerns related to the project from a certain group - Monitoring of project environmental and social impacts and activities on a certain group - Establishing relations with certain groups 	Certain target groups, vulnerable groups
Project / Municipality / ILBANK website	<ul style="list-style-type: none"> - Information sharing and progress updates - Disclosure of ESIA, ESMP, LAPRF, LARAP and other relevant project documentation - Announcements of key events, dates and published documents 	Impacted communities and PAPs, national and local media, academia, NGOs, businesses and organisations/agencies
Social media (Facebook, Twitter, Instagram accounts, WhatsApp groups)	<ul style="list-style-type: none"> - Non-technical information sharing and progress updates - Announcements of key events, dates and published documents 	Impacted communities and PAPs, national and local media, academia, NGOs, businesses and organisations/agencies
Project information brochures/leaflets	<ul style="list-style-type: none"> - Sharing brief project information to provide regular update - Inform on certain issues such as land acquisition, land entry and exit, project time schedule etc. - Dissemination of site specific project information 	Impacted communities and PAPs, businesses and organisations/agencies

Timing of Stakeholder Engagement

Timely application of the stakeholder engagement activities that will be conducted during ESIA/ESMP and LARAP implementation are critical in supporting the Project's risk management process, especially during the early identification and avoidance/management of potential negative and positive impacts that will allow for a cost-effective project design.

Stakeholder engagement is an on-going process that spans throughout the life of the project starting from planning and design, construction, operation until the end of decommissioning.

Project specific SEPs that will be prepared by the municipalities will be expected to present a stakeholder engagement strategy that covers the entire life span of the project, showing the timing and frequency of engagement activities that will be carried out under each project phase.

Institutional Arrangements for Stakeholder Engagement

The management, coordination and implementation of the project specific SEPs and its integral tasks will be the responsibility of dedicated team members within the relevant municipality. In administering the SEP, the municipalities will be responsible of:

- Preparing and updating the content of the draft SEP (in line with this SEF) and sharing it with ILBANK for final approval
- Assigning dedicated staff for the implementation and monitoring of engagement activities
- Preparing relevant engagement tools and material committed under the project specific SEP and their timely application and/or dissemination
- Approving and facilitating all stakeholder engagement events and disclosure of material to support stakeholder engagement events
- Keeping records of all engagement activities and to monitor and report to ILBANK on a regular basis (through providing inputs on engagement activities in the semiannual progress reports)
- Ensuring that all feedback received from tasks carried out are incorporated in relevant documents and reflected in the decision-making process
- Maintaining the stakeholder database.

Key Principles of Stakeholder Engagement

The SEF and relevant SEPs will ensure that the following key principles are applied to all engagement activities:

- The timing and number of engagement activities is designed to maximize stakeholder involvement while avoiding disruption of the 'daily business' of local stakeholders in particular as well as avoiding 'consultation fatigue'
- All engagement activities are in line with project specific SEP schedule and parallel to the commitments made in ESIA/ESMPs and also LARAPs if any.
- Ensure that all engagement activities are recorded and findings/feedback that require any action to be taken is incorporated to relevant documents, shared with responsible parties and followed up in a timely manner
- Ensure that every engagement activity is culturally appropriate, sufficient and disseminated in a timely manner with equal access to all relevant stakeholders allowing for their increased participation and feedback
- Project specific SEPs are updated as required during the project life cycle.

SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

ILBANK has organized a public consultation meeting to disclose the Project's ESMF (including this SEF) and LARPF documents on March 27th, 2019. Brief summary of the meeting is presented under Section 8 of the ESMF.

GRIEVANCE MECHANISM

A Grievance Redress Mechanism (GRM) will be developed by the municipalities for potential use by both external and internal stakeholders (workers etc.). The aim of the GRM will be to timely resolve any project related grievance that may result in the complainant being worse off due to project activities.

Each borrowing municipality will form a grievance system and assign designated staff for its management. Once the system is established it will be made public and introduced to all stakeholders providing equal and easy access to all. Depending on the magnitude of impact generated by the project and the need of different municipalities; a hotline may be established or contact numbers of responsible officers can be provided to the affected people and communities.

Every grievance received through various means (forms, phone, through staff etc.) employed by the municipality will be recorded to a grievance allowing for timely response and action to be taken by the responsible party assigned for resolution of the grievance. For easy use, two grievance forms; namely Grievance Register Form and Grievance Close Out Form have been provided as annex to this SEF (see Annex 6).

Generally, all municipalities adopt a service called "White Table" which aims to collect complaints and requests from the local residents. Although the White Table system is not considered as a grievance mechanism, it is still acknowledged as a general complaint mechanism that is utilized by municipalities. The Project will aim to enhance and improve the current application of the White Table mechanism through project specific arrangements. Any grievance related to a sub-project will be first logged at the municipality level and will be addressed by designated staff within a pre-defined period. If the complainant is not satisfied with the complaint resolution, then the case will be submitted to further levels. There will also be other means of logging grievances such as a toll-free number, online forms, social media channels of the municipalities that have been made available for citizens to submit grievances. Table 4 provides a four level GRM system that the Project will adopt.

Table 4. Project GRM

Level	Authority	Method	Procedures	Response Time
1.	Municipality (hotline, White Table, e-mail,	In person, by phone, by writing, electronically -	Municipality will assign a Community Liason Officer to lodge and manage grievance	2 weeks

Level	Authority	Method	Procedures	Response Time
	online forms etc.)	in all cases grievances will be recorded in a grievance logbook.	and feedback mechanism of the sub-project. Grievance will be assessed. If needed will be examined on-site Response / redress of grievance will be communicated to petitioner. If cannot be resolved, Level 2 or Court of First Instance depending on grievance.	
2.	ILBANK in Ankara (phone number, address, e-mail)	By phone, by writing, electronically	Lodging of grievance will be confirmed. Grievance will be assessed by the municipality and ILBANK will be informed. Response / redress of grievance will be communicated to petitioner by the municipality. ILBANK will monitor the municipality to run the grievance mechanism smoothly. If cannot be resolved, petitioner will be referred to Court of First Instance.	4 weeks
3.	World Bank's Corporate Grievance Redress Service		For information on how to submit complaints to the World Bank's corporate Grievance Redress Service, please visit http://www.worldbank.org/GRS For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org	
4.	Responsible Court of First Instance (address)	By writing	Pursuant to legal regime	Pursuant to legal regime

MONITORING AND REPORTING

Monitoring and evaluation of the stakeholder engagement process is of utmost importance to ensure timely and effective decision making for Project implementation.

Each project specific SEP will include a timeline for engagement activities as well as defining responsible parties for the implementation and monitoring of engagement activities. Monitoring of engagement activities can be realized through identifying key performance indicators that reflect the objectives of the SEP, and the specific tasks and actions. A series of sample key performance indicators by Project Phase are presented in Table 5.

Table 5. Sample Key Performance Indicators by Project Phase

Project Phase	Indicator	Verification Method
Design and Planning	Preparation of sub project specific SEPs	# of SEPs prepared
	Public consultation meetings carried out to provide Project information and introduce project documents such as ESIA/ESMPs and/or LARPF/LARAPs	# of meetings conducted # and type of participants attended
	Designated staff appointed to carry out SEP	Names of staff appointed
	Establishment of Project GRM	Operational GRM
Construction	Raising awareness on Project activities	# of meetings held Decrease in the # of grievances received due to construction
Operation	# of grievances received due to operation	Decrease in the # of grievances received due to operation

As per the reporting requirements set in the ESMF and LARPF of the Project, the municipalities will be responsible of reporting to ILBANK semiannually on project progress. Sub-project specific progress reports will also include a section on stakeholder engagement activities conducted during the specified period. Stakeholder engagement activities can be presented in a tabular format listing the tasks undertaken, the time of action, responsible party, target group and the purpose of the action will be presented. The municipalities will inform ILBANK on any changes made in SEP (if any).

ANNEX 6. SAMPLE GRIEVANCE AND GRIEVANCE CLOSE OUT FORM

Grievance Form

Reference No			
Name – Surname <i>Although giving name and address is not compulsory, it should be kept in mind that during the feedback process regarding the grievance some problems may occur due to lack of information</i>			
Please mark how you wish to be contacted		Please provide details for your preferred communication	
E-mail			
Telephone			
Mail			
Other			
Province/Town/Settlement			
Date			
Category of the Grievance			
1. On abandonment (hospital, public housing)			
2. On assets/properties impacted by the project			
3. On infrastructure			
4. On decrease or complete loss of sources of income			
5. On environmental issues (ex. pollution)			
6. On employment			
7. On traffic, transportation and other risks			
9-Other (Please specify):			
Description of the Grievance What did happen? When did it happen? Where did it happen? What is the result of the problem?			
What would you like to see happen to resolve the problem?			

Signature:

Date:

Grievance Close Out Form

Grievance closeout number:	
Define immediate action required:	
Define long term action required (if necessary):	
Compensation Required?	[] YES [] NO
CONTROL OF THE REMEDIATE ACTION AND THE DECISION	
Stages of the Remediate Action	Deadline and Responsible Institutions
1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	

COMPENSATION AND FINAL STAGES

This part will be filled and signed by the complainant after s/he receives the compensation fees and his/her complaint has been remediated.

Notes:

Name-Surname and Signature of the
Complainant

Title-Name-Surname and Signature of
the Representative of the Responsible
Institution/Company

Date..../...../.....

ANNEX 7. STAKEHOLDER CONSULTATION MEETING MINUTES AND ATTENDANCE LIST

SUSTAINABLE CITIES PROJECT-II (ADDITIONAL FINANCE) ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK LAND ACQUISITION AND RESETTLEMENT FRAMEWORK MINUTES OF MEETING 27.03.2019

QUESTION 1 (General Directorate of National Estate): Within the scope of the project, it was stated that only 2942 Expropriation Law was used and different land acquisition methods such as permutatio (trampa) could be used in big projects such as the project realized in Ceyhan Private Industry Specialized Region. With this method, it is stated that alternative lands can be proposed to the owners by using the equivalence principle. In addition, it is stated that by using Article 18 of Law no. 3194, the citizens have not been behaved unjustly. It is also stated that there are other means of implementations for land acquisition. For example, for agricultural lands, land consolidation can be made by zoning application.

ANSWER: Since the impact area of the project is limited, it is stated that only the Expropriation Law is focused on and that land acquisition transactions do not only include expropriation; it is stated that the establishment of the right of easement and the temporary leasing of the land are also used. In addition, it was stated that there would not be projects such as large dam projects, and therefore a collective resettlement within the scope of the project was not expected. Considering the risk of not finding an equivalent land, permutatio (Trampa) was not considered as a method in the Framework documents. Currently, local administrations to be invested have not been identified. With the determination of the municipalities that will benefit from the loan, they will determine the legal regulations that are appropriate for their own projects for land acquisition. The general approach in projects financed by the World Bank is to complete the investment by keeping the land acquisition operations to a minimum.

QUESTION 2 (General Directorate of National Estate): During the preparation of the project, it was asked whether a study was carried out regarding the zoning plans and technical infrastructure requirements.

ANSWER: The first series of the Sustainable Cities Project includes a planning component funded by the European Union as a grant. However, the investment component of the Project and the planning component are carried out in parallel to meet the increasing urgent investment needs of the local governments with the entry into force of Law No. 6360. Two mandatory plans (Capital Investment Plan and Integrated Urban Water Management Master Plan) will be made for 10 selected municipalities and Water and Sewerage Administration. In this way, local governments will be able to plan their investments for a long term with a holistic approach.

QUESTION 3 (General Directorate of Local Governments): It was asked whether the EU Funds and the World Bank funded projects can be carried out together.

ANSWER: There is an example of a 3 billion-euro FRIT project financed by the EU as a grant for use in the southeastern provinces of Turkey where the Syrian host community is existing substantially. The European Union makes use of this financing by using International Finance Institutions (World Bank, French Development Agency, etc.) as an

intermediary. In this context, the grant is provided to be spent by the procurement rules and environmental and social safeguard policies of the mentioned Financial Institutions. Our priority is to use the grant resources provided to our country and in case of further need to apply to the use of loans.

QUESTION 4 (General Directorate of Land Registers): The sectors financed under SCP-2 (Additional Loan) are also financed by internal financing by İller Bank. For example, Bicycle Road Projects are funded by İller Bank with a grant of 45%. How will local governments make their preference?

ANSWER: In general, general information was given about the loan conditions of the World Bank and it is stated that there are appropriate long-term loans with 5-year grace period. As the World Bank is a non-profit development bank, they are able to provide low-interest loans with long-term. However, based on the prepared Feasibility Reports, local governments will be able to decide on the loans which they will use.







TOPLANTI KATILIMCI TUTANAĞI						
Tarih:	27 Mart 2019					
Yer:	İller Bankası - Gökarambar - 4. Kat Toplantı Odası					
Konu:	SSP-2 (Ek Finansman) Paydaş Katılım Toplantısı					
No	Ad-Soyad	Kurum	Görev	Telefon	e-posta	
1	Okan AKSUOĞLU	Terel Yönetimler Gn. Md.	Genel ve Şeh. Uzmanı	410 81 62	okan.aksuoglu@csb.gov.tr	
2	Ahmet ERUN	Türkiye Belediyeler Birliği	Proje ve Finans Uzmanı	421 80 00	ahmet.erun@tbb.gov.tr	
3	Ahmet ALGUN	Tapir ve Katılım G.	Tapir ve Katılım Uzmanı		ahmet.algun@tbb.gov.tr	
4	Esra ARIKAN	Dünya Bankası	Genel Uzman	459 83 77	earikan@worldbank.org	
5	Dila F. UYKUSU	ILBANK A.Ş.	Teknik Uzman	508 79 36	dilykusut@ilbank.gov.tr	
6	Merve YURTİKURAN	Dünya Bankası	Genel Denetçi	459 83 77	merve.yurtikuran@worldbank.org	
7	Faruk ERGUN	Dünya Bankası	Sistem Uzmanı		faruk.ergun@worldbank.org	
8	Cemal GÜNGÖR	ILBANK A.Ş.	Teknik Uzman	507 79 32	cgulhan@ilbank.gov.tr	
9	Selçuk AYDEMİR	Milli Emlak G.M	D. Bşk	586 28 13	selcuk.aydemir@csb.gov.tr	
10	Ayfer KARADILIP	ILBANK A.Ş.	Teknik Uzman	508 79 32	ayfer.karadilip@ilbank.gov.tr	
11	Gönlü EUDEROĞLU	ILBANK	Teknik Uzman	508 79 27	zeynepoglu@ilbank.gov.tr	
12	Sevil UYSAL	ILBANK	Teknik Uzman	508 79 45	sevil.uyasal@ilbank.gov.tr	
13	Gökçe ASLAN	"	Müdür	508 79 03	gokce.aslan@ilbank.gov.tr	



TOPLANTI KATILIMCI TUTANAĞI

Tarih:	27 Mart 2019						
Yer:	İller Bankası Gökcambarı - 4. Kat Toplantı Salonu						
Konu:	SSP-2 (Ek Finansman) Paydaş Katılım Toplantısı						
No	Ad-Soyad	Kurum	Görev	Telefon	e-posta		
14	Yusuf AK	İller Bankası A.Ş. Ulaştırma İşletme Dairesi Başkanlığı	Teknik Uzman	532 580 1878	yak@ilbank.gov.tr		
15	Tamer BAŞAR	"	"	508 7911	tbasar@ilbank.gov.tr		
16	Sinan GÜMÜŞOK	"	"	908 7909	sgumusok@ilbank.gov.tr		
17	Gülizar Eroğlu	4	Uzman	508 7929	geroglu@ilbank.gov.tr		
18	Emre Yalçın	"	Teknik Uzman	508 7916	eyalcin@ilbank.gov.tr		
19							
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ANNEX 8. ESMS and Labor and Working Conditions of ILBANK

ILBANK'S AREA OF OPERATION

Ilbank's main area of operation covers water supply and wastewater networks and treatment plants. Among the highest risk projects realized by Ilbank in terms of environmental and social impact are WB financed Municipal Services Project (MSP) 1 and 2, and Sustainable Cities Project (SCP) 1 and 2 projects. Other than water projects, Ilbank finances municipal infrastructure projects such as; construction and repair of provincial roads, construction and rehabilitation of pavements, and construction of bridges. The risk level of these projects range between moderate to high risk. In order to benefit from international standards, Ilbank prefers financing complex and higher risk projects from international finance sources such as WB, EIB, JICA, Islamic Development Bank.

Environmental and Social Management System

In scope of the Quality Management System Studies, Ilbank has received TS-EN-ISO:9001-2015 Quality Certification. Ilbank does not have a separate Environmental and Social Management System (ESMS) or set of procedures for ESMS.

As an affiliate to Turkish Ministry of Environment and Urbanization, Ilbank is subject to Turkish national laws and regulations. Therefore, it is responsible for the application of various law and regulations including Environment Law, Expropriation Law, Resettlement Law etc. for the sub-projects it finances or signs sub-loan agreements.

Credit evaluation process of Ilbank includes technical, economic and financial assessment of subject loans. However, there is no specific environmental and social assessment criteria defined in the scope of technical assessment.

Projects that Ilbank finances through international financing such as WB, EIB, JICA are handled by a separate department. This department utilizes key procedural documents for internationally financed investments.

The key procedural documents managing the project's environmental and social screening, review and monitoring procedures for sub-projects are the ESMF and LARPF/RPF which are implemented throughout the lifetime of the international funded projects. For WB financed projects, these framework documents are integrated into the PAD and Operational Manual of the project and also the core elements are referred in the Loan Agreements. Therefore, Ilbank becomes fully responsible for the satisfactory implementation of the safeguard framework documents. The ESMF and LARPF additionally require that site specific environmental and social assessment documents are prepared for the sub-projects and these become a part of the sub-loan agreements between Ilbank and sub-borrowers. Through these sub-loan agreements Ilbank and WB manage and oversee the sub-projects in terms of the WB's safeguards requirements.

The ESMF describes the sub-project screening criteria according to the WB OPs and also includes comparison of WB requirements and standards with respect to national standards. Similar to the ESMF, the LARPF compares national law and WB policy requirements on land acquisition and sets the principles for a best practice land acquisition process. As a rule of thumb, the most stringent standards apply to the projects for all environmental and social standards.

The screening of sub-projects is initially discussed between the Ilbank PIU and sub-borrowers to determine the safeguards risks of the project. Before reaching a final agreement on the safeguard risks, the Ilbank PIU consults with the WB safeguards team for final decision. The appropriate safeguard instrument is then decided upon the mutually agreed safeguard risks.

Ilbank also undertakes the initial review of the safeguard instruments, however the no-objection process depends on the agreement reached during negotiation process. Despite the fact that Ilbank and WB had agreed that WB will conduct prior review for safeguard instruments for all Category A projects and for the first 3 Category B projects in SCP 2's ESMF document, in practice Ilbank preferred to consult on all sub-projects to be reviewed in advance by the WB and that no-objection is granted before disbursement for the sub-projects' kick-off. In the AF project, it is once again suggested that all Category A and the first 2 Category B projects be subject to WB's prior review and no objection. However, if any significant issues arise for the Category B sub-projects it will again be required that Ilbank informs the WB and post review is converted to prior review in such cases.

After site visits and evaluation of safeguards documents, Ilbank team prepares semiannual progress reports for the WB which also includes environmental and social performances related to the sub-projects.

ILBANK'S SAFEGUARDS MANAGEMENT CAPACITY

Ilbank's International Affairs department has experienced staff in technical, procurement, environmental, social and FM related procedures of the WB. Ilbank staff received numerous trainings related to WB's safeguard operational policies including recent ESF as a part of the ESF Borrower Training roll out program. Ilbank's safeguards team consists of 2 technical experts - one acting as the environmental focal point and the other as the social development/land acquisition focal point. For each sub-project's environmental and social risk identification and monitoring, Ilbank and WB safeguards teams conduct regular meetings, informal discussions and joint meetings with the sub-borrowers as necessary. Ilbank and WB team also conduct and attend site visits during sub-project risk identification and implementation. Ilbank team gained significant experience during the implementation of previous Municipal Services 1-2 and SCP 1-2 projects financed by the Bank.

ESS 2 LABOR AND WORKING CONDITIONS - APPLICATION TO ILBANK

Occupational Health and Safety

In recent years, Turkey has undergone a reform to improve its national OHS system through adapting a set of international and regional standards into its national level requirements for the prevention occupational risks defined in the ILO Occupational Safety and Health Convention, 1981 (No. 155). The convention, along with the Occupational Health Services Convention, 1985 (No. 161) were both ratified by Turkey in 2005 who is also party to the Labor Inspection Convention, 1945 (No. 81) since 1951. In 2014, Turkey ratified the Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187). A list of ILO conventions ratified by Turkey that may be applicable for the general management of Project workforce is provided as Annex.

During 2012, a stand-alone Law on OHS (No. 6331) was put into force (20 June 2012). The OHS Law governs workplace environments and industries (both public and private) as well as virtually all classes of employees including part-time workers, interns, and apprentices. The legislation is comprehensive and is generally applicable across all sectors and many industries.

Ilbank has a separate Occupational Health and Safety Policy, however it lacks detailed procedures. As government agency Ilbank is subject to national law on OHS of the Ministry of Family, Labor and Social Security. According to the national OHS Law, all employers must notify the Ministry in 3 work days after OHS related incidents. The time period and conditions for Ilbank to notify WB has been defined and agreed as detailed in relevant sections of the ESMF document.

All Ilbank facilities are equipped with fire safety instruments as required by local regulation. Fire safety plans are also prepared and revised by the responsible department. The staff receives routine training on fire safety and first aid. Regular drills are conducted and reported.

Labor and Working Conditions

Turkey is party to a multitude of ILO conventions, including but not limited to conventions on: equal treatment of employees, gender equality, child labor, forced labor, OHS, right of association and minimum wage. Accordingly, the current Turkish Labor Law (No.4857) is in compliance with international labor standards and the Bank's ESS2 requirements.

Ilbank has published a corporate level Human Resource Policy (dated January 4, 2013 in the Official Gazette numbered 28518) that is also in line with national regulations as well as WB requirements. The document aims to define the employee personal rights including; working hours, leaves (maternity, social events, unpaid), financial rights, working conditions, promotions etc. The policy allows for equal opportunity and employment rights. As Ilbank is a government agency no one under the legal age (18 years) is permitted to work within the institution thus no child labor related issues exist. Cases including unregistered/ uninsured employment of refugees, unequal employment opportunities for women etc. that may be relevant to civil works that Ilbank's or borrowing municipality's contractors may encounter, will not be an issue in terms of incompliance with ESS2 for Ilbank.

Grievance Redress Mechanism for Ilbank Employees

Ilbank aims to follow-up on customer satisfaction as well as to meet the needs and expectations of its employees through a grievance mechanism. For this purpose, there are Request and Complaint Boxes in various parts of Ilbank buildings. Additionally, requests, grievances and suggestions can be sent to the Quality Management Unit via the utilization of, 'Send Message' and 'Communication' sections of the Quality Management website. Requests, grievances and suggestions received are evaluated every 30 days and presented to management. The evaluation results are listed internally on the grievance system and can be accessed by employees through their own intranet.