



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 07/31/2019 | Report No: ESRSC00733



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Turkey	EUROPE AND CENTRAL ASIA	P170532	
Project Name	Improving Rail Connectivity in Turkey		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Transport	Investment Project Financing	1/6/2020	3/30/2020
Borrower(s)	Implementing Agency(ies)		
	Ministry of Transport and Infrastructure		

Proposed Development Objective(s)

To increase rail freight traffic in main transport corridors and develop institutional capacity of Ministry of Transport and Infrastructure to build, maintain and operate branch lines and manage modern logistic centers.

Financing (in USD Million)	Amount
Total Project Cost	300.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

Building on the findings and results of the Bank-funded Technical Assistance on Last Mile Connectivity/Options to Improve Freight Rail Logistics in Turkey (P165757), the proposed project aims to increase the freight modal share of railways in Turkey through last-mile connectivity improvements and strengthening of institutional capacity.

The project is developed around three main categories:

- Component I – Works is expected to include two main branching lines, Çukurova Region & Iskenderun Bay railway connection & Filyos Port/Industrial Zone connections, as well as two or three more projects to be selected from the list of 10 potential LMCs.



- Component II – Design & Consultancy is expected to include the survey, design & feasibility studies for the 10 potential LMCs identified by the Ministry as well as supervision of the construction works under Component I.
- Component III – Institutional Capacity Development is expected to include operating costs of the Project Implementation Unit as well as development costs of sectoral reforms and institutional capacity.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

Component 1 - Currently, the project design and details are partially known for Cukurova Region and Iskenderun Bay railway connection (“Cukurova railway”) and Filyos Port/Industrial Zone railway connections (“Filyos railway”). The design and feasibility studies for both of the railway connections are expected to be finalized by June 2019. (i) Cukurova railway is located in south of Turkey in Adana and Hatay Provinces and it consists of two main lines with a total length of approximately 38 km crossing and includes five station buildings – Erzin station is already existing and will be expanded and the rest of the stations will be built from scratch. The railway will connect existing Osmaniye OIZ and Yumurtalik Freezone to planned Ceyhan OIZ, Ceyhan Energy Specific OIZ and Erzin Port. The project passes through industrial lands, pasture lands that are used for grazing and crop cultivation. The closest settlement is Yukariburnaz (30 m from the project site). Seasonal migrant workers exist in the region. During project preparation, the Environmental and Social Assessment (ESA) will assess the prevalence, migration patterns and livelihoods of seasonal migrant workers in project affected lands. In the upper part of the railway route, a section of approximately 300 m overlaps with the boundaries of Isos Antique City – a culturally protected area according to Turkish Law. The ESA will also determine whether and how the route impacts this protected area. The project area of Cukurova railway has no international protection status (ii) Filyos railway will be constructed in Zonguldak province, located in the western part of the Black Sea region. Filyos railway consists of 15km of railway, 8km of road including a bridge over Filyos creek and 2 stations. The sub-project will connect Filyos port which is under construction (started in July 2016) to the already existing railway network. The sub-project area is within the designated industrial zone set out in the zoning plans. Filyos railway passes through agricultural, pasture and forest areas. The forest land, has been deteriorated due to settlements, agricultural and husbandry activities. There are 2 settlements close to the proposed route, namely Gokceler (2 km) and Sazkoy (1 km) villages with around 300 villagers in each respectively. Filyos port is adjacent to a registered tumulus which is a 3rd degree culturally protected area. The railway route is expected to pass through this area if the Ministry of Culture and Tourism allows. According to the info received so far, there are no naturally protected areas according to national legislation. On the other hand, Filyos Port/Industrial Zone connection is partially overlapping with Amasra Coast which is recognized as an IBA according to international standards.

The Project will support the Feasibility Study (FS) of 10 LMCs. The Project also intends to finance construction of two LMCs which may be part of the 10 FS LMCs. The FS will start during Project implementation, but their TORs will be prepared during preparation. The Bank will assist the Borrower in the selection of the 10 FS LMCs as well as the preparation and the implementation of the FS to ensure that the FS meet all relevant requirements of the ESF and provide a robust basis on the selection and implementation of the 2 LMC lines to be constructed under the Project. For this purpose, the Bank will review the TOR and provide clearance before Appraisal. The criteria for the selection of the 2 lines to be constructed under the Project will be clearly agreed upon with the Borrower and documented in key project documents including the Appraisal Stage ESRS, PAD and Project Operations Manual. The Bank’s no objection will be required before the inclusion of the two LMCs for construction within the scope of the Project, based on the confirmation that all relevant ESF requirements are adequately met.

D. 2. Borrower’s Institutional Capacity



The Borrower is the General Directorate for Infrastructure Investments under the Ministry of Transport and Infrastructure (MoTI). While the Ministry has experience implementing a World Bank financed project, the project closed 5 years ago and it was implemented by a different directorate, namely the General Directorate of State Railways of the Republic of Turkey (TCDD). In addition to experience with the World Bank, MoTI has also worked with JICA, EBRD and EIB in very large scale public transport projects in Istanbul. The PIU has been established and as for now dedicated staff responsible for environment, land acquisition, procurement and financial management have been assigned. MoTI and/or the PIU has no experience applying the new ESF, nor did it receive the ESF borrower training as the project was not in the pipeline then. However, the Bank E&S team will provide ESF training during project preparation and ESF related guidance continuously as needed. A session on ESS 5 was conducted with the relevant PIU counterparts in the last mission. Similar capacity building sessions on other standards (especially ESS 1, 2, 4 and 10) will be provided by the E&S team during project preparation.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating

Substantial

Environment risk is rated as Substantial. At the concept stage, the environmental risks related to the project are anticipated as (i) air pollution and noise from construction machinery and quarries and operation phase noise and vibration impacts, (ii) soil disturbance and loss during earthmoving, (iii) tree-cutting and loss of vegetation, pest management, (iv) waste management, and (v) construction camp management, (vi) community health and safety (traffic safety, earthquakes, avalanches etc. and (vii) potential impacts on culturally and naturally protected areas, which are mostly relevant to construction and operation of the railways. Both the known railway connection routes (Adana and Filyos) will pass through green fields occasionally. There are no known critical habitats in the project area. The anticipated environmental impacts are mostly temporary, predictable and/or reversible, and the nature of the Project does not preclude the possibility of avoiding or reversing them. The potential impacts are medium in magnitude and in spatial extent. The past experience of the Borrower and the implementing agencies in developing complex Projects is limited in some respects, and their track record regarding ES issues suggests some concerns which can be readily addressed through implementation support. Therefore, the Project environmental risk is determined as substantial at the concept stage.

Social Risk Rating

Substantial

Social risk is rated as Substantial. Social risks cover labor, community health and safety, cultural heritage and land acquisition. Although the project is expected to utilize automatized systems for railway laying, around 200 laborers are estimated for each of the 2 railway connections. Labor influx is expected but at a limited scale. Regarding land impacts, the project would require permanent and temporary displacement where new railroads are built. The maximum width of railway ROW is planned to be 40 km in Cukurova Region - Iskenderun Bay railway connection sub-project and 15 km railway + 8 km road in Filyos Port/Industrial Zone connection sub-project. Permanent land acquisition will also be required for stations (which are small, fixed structures) - 5 stations in Cukurova Region- Iskenderun Bay railway connection and 2 stations in Filyos Port/Industrial Zone connection. The scale of physical displacement will be very small, if at all, since the railroad ROW will be adjusted to avoid or minimize potential social impacts including physical displacement. According to information received during the last mission, expropriation



plans are still to be prepared, thus the project footprint is not known for both the railway connection sub-project sites. Consequently, it is not possible to identify project affected persons at this stage. While most of the project risks and impacts are predictable and the project is not in socially sensitive areas, impacts on cultural heritage sites are expected. In addition, the PIU (DG for Infrastructure Investments) has no past experience with World Bank operational policies and the new ESF. However, the PIU has an understanding of international standards for environment and social issues as they have received international financing from other IFIs. During project preparation, a detailed assessment of the PIU's experience and capacity will also be undertaken. Due to the above mentioned factors the social risk rating at concept stage is Substantial.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The environment and social risks are both rated as substantial. Two categories of risks are recognized: (i) those that relate to the impacts of project activities; and (ii) contextual. The former relates to: civil works related environmental disturbances, habitat degradation and land acquisition and resettlement. The latter, contextual risks, at times, could have a bearing on security to contractors and community safety. All the risks are identifiable and manageable. Environmental and social risks are limited to the impacts associated with railway construction and operation phases such as: (i) air pollution and noise from construction machinery and quarries and operation phase noise and vibration impacts, (ii) soil disturbance and loss during earthmoving, (iii) tree-cutting and loss of vegetation, pest management, (iv) waste generation and management (including hazardous waste), and (v) construction camp management, (vi) community health and safety (traffic safety, earthquakes, avalanches etc.), (vii) labor and working conditions (including occupational health and safety), (viii) land acquisition induced economic displacement for individuals and businesses, (ix) potential impacts on culturally and naturally protected areas. WBG's General Environmental Health and Safety (EHS) Guidelines as well as EHS Guidelines for Railways, Toll Roads and Electric Power Transmission and Distribution will be carefully assessed and used particularly to address issues related to project environmental and social risks. For the technical assistance studies within the scope of the project (feasibility and design studies of 10 LMCs), the requirements of the ESF will be integrated into ToRs to be prepared for each feasibility study. The outputs of the feasibility studies taking the Bank E&S requirements into consideration will be utilized for the decision of 2-3 LMCs to be constructed with the finance from project funds, to ensure their compliance with the ESF. The site specific environmental and social assessment instruments including the Resettlement Action Plans (RAPs) for the selected 2-3 LMCs for construction will be prepared during implementation stage. The site specific ESAs, Land Acquisition Plans and Stakeholder Engagement Plans for the 2-3 LMCs to be identified during implementation based on the FS and constructed through project funds will be prepared during implementation stage. To address the above mentioned risks, the client will prepare before appraisal the following instruments: (i) Two Environmental and Social Impact Assessment (ESIA) studies, Land Acquisition/Resettlement Action Plans (RAP/LAP) and Stakeholder Engagement Plans (SEP) for Cukurova and Filyos railways ; (ii) Community health and safety management plan; (iii) Labor Management Procedures; (iv) Cultural Heritage plan for Filyos railway; and (iv) ToRs for each feasibility study for 10 LMCs. The site specific ESAs, Land Acquisition Plans and Stakeholder Engagement Plans for the selected 2-3 LMCs to be constructed through project funds within the scope of Component II will be prepared during implementation stage. The associated facilities for Cukurova and Filyos railways could be considered as electricity transmission lines for electrification of the railways, quarries for supply of materials and access roads. In Cukurova, existing quarries and



camp sites formerly utilized by Highway Directorate General are planned to be used during construction, but to be determined at the appraisal stage. The project sites are already accessible through existing roads, therefore no additional access roads are anticipated. In terms of electricity requirements, 30 kV electrification system will be utilized by Cukurova railway. It is planned that the infrastructure will be supplied from the nearby Adana Ikizler Substation which is currently in operation. The final design will reveal if any additional structures for connection are needed. The structures to be utilized for electrification are considered as associated facilities. There is also Erzin port to be constructed in line with the priorities of Turkish transport sector. Although MoTI is planning to conduct these projects simultaneously, the construction of Erzin port is not dependent on the construction of the railway network and therefore not considered as associated facility. Moreover, there are 2 planned OIZs in the Cukurova Region but these projects will be constructed independent from the proposed Cukurova railway project and therefore not considered as associated projects. The associated projects and their environmental and social impacts will be evaluated in the E&S assessment documents of Cukurova and Filyos railway projects.

In Filyos, since there is a large construction area for port nearby the planned sub-project area, the utilities (e.g. stone quarry, camp site etc.) of the existing construction site are planned to be used to the extent possible. However, the details are not clear at this stage. In terms of electricity requirements, 30 kV electrification system will be utilized by Filyos Port/Industrial Zone connection. However, the right of way of the energy transmission line (ETL) and the design of the required structures are yet to be identified. The additional structures for electrification system are considered as associated facilities. Filyos port construction has started in July 2016 and still ongoing. The designated OIZ area and the Filyos port are not considered as associated facilities as the decision for these projects have been taken back in 2014 and the project constructions have already started and both of these projects will be constructed independent from the proposed Filyos railway project.

The associated facilities for the 2-3 selected LMCs to be constructed within this project financing will be identified at the implementation stage and assessed in the ESA documents in line with relevant requirements of the ESF.

Areas where “Use of Borrower Framework” is being considered:

Given the substantial environmental and social risk of the project and that the implementing entity does not have significant experience in working with the World Bank requirements – wither those required under Social and Environmental Safeguards Policies and new ESF – Borrower's E&S Framework will not be used. The project will be prepared and implemented consistent with the ESF and in full compliance with the national environmental and social legislation, other regulations and standards.

ESS10 Stakeholder Engagement and Information Disclosure

Since both of the projects are exempt from the national EIA regulation, there is no formal stakeholder engagement process that the borrower will follow to comply with national legislation. The only stakeholder engagement that is expected to take place, as per the national legal framework is with project affected land title holders during negotiations for land acquisition. This does not meet the requirements of ESS 10. However, the Borrower has been informed of the Bank requirements pertaining to ESS 10 and asked to fulfill the necessary engagement activities throughout project life. The borrower has well established connections and engagement with public authorities that are involved in the project. Engagement with local community and other stakeholders will be ensured through SEPs prepared for the two subprojects and through SEF for the unknown subprojects. Bank E&S team will guide the



Borrower in its efforts to bridge the gaps raised between national law and Bank standards. The borrower's capacity on stakeholder engagement will be improved considerably during project preparation.

Directly impacted PAPs that have been identified so far are residents and business owners residing or operating in the communities in the sub-project areas. Vulnerable and disadvantaged groups will be identified under the ESIA's. Additionally, local NGOs/CSOs, community leaders, and local government representatives residing or working in the project areas will also be considered as stakeholders. The Ministry of Environment and Urbanization, Ministry of Agriculture and Forest, Ministry of Industry and Trade are significant project stakeholders as well. The Borrower will prepare SEPs for already identified sub-projects (Cukurova Region - Iskenderun Bay railway connection and Filyos Port/Industrial Zone connection), and a SEF for the possible sub projects by appraisal stage. For the two sub-projects (2 railway connections in two different provinces), the Borrower's ESCP will ask site specific safeguards instruments to be prepared after these 2 additional projects are selected based on their feasibilities. Since the identified sub-projects will require ESIA's, LAP/RAPs, public consultation meetings will be organized to receive feedback from project stakeholders. Additional stakeholders will be identified and mapped during the project preparation phase. Modalities for their engagement will be captured in the SEP.

The SEP will promote two-way communication between the PIU and different stakeholders continuously. Information regarding the project, environmental and social risks and impacts, proposed mitigation measures, resettlement plans, grievance redress mechanism, will be shared with project stakeholders on a regular basis. As part of the ESIA's, the PIU will maintain and disclose a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback has been taken into account (or reasons if it is not).

Grievance Redress Mechanism: The borrower currently utilizes the national GRM system which is the Presidential Communication Center (CIMER) along with its own project and site level GRM through regional offices and site managers. The main channels for submitting grievances of borrower's existing GRM are official letters, phone calls and verbal communication through site personnel. During project preparation, the functionality and accessibility of the GRM will be assessed and project level adjustments will be made as needed. Within its current practice the borrower takes into consideration the grievances logged by the stakeholders during project design and implementation and thus, modifies the design accordingly. In addition, a GRM specifically for direct and contracted workers will be developed.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

The project will not be labor intensive as the railway tracks are constructed through a mechanized/automated machines. Project workers include the direct workers, contracted workers and primary supply workers. The PIU employees are civil servants. Primary supply workers will be evaluated under ESA studies. It is foreseen that a minimum of 100 workers will be employed and will use the camp site accommodation. It is anticipated that technical



and skilled staff will be utilizing the accommodation facilities on site and local people will be preferred to the extent possible as unskilled workers. The labor influx risks and details will be assessed within the scope of ESA studies.

The Cukurova region, one of the top agricultural plains of Turkey, receives seasonal migrant workers from Turkey's south eastern region or by Syrians under temporary protection during the harvesting season.

Labor Management Procedure: Turkey is party to a multitude of ILO conventions, which is in line with ESS2 requirements. National Labor Law includes provisions on non-discrimination, freedom of association, minimum employment age, child and forced labor, occupational health and safety and dispute resolution. Risks related to child/forced labor are not foreseen. Although not anticipated in the railway sector, potential risks related to child and forced labor of the primary suppliers (i.e. Supply of stone for the rails, steel manufacturers) will be evaluated in the ESA studies. The borrower will develop a Labor Management Procedure to address gaps with ESS2, both for its own staff and for employees of civil works contractor and consultants.

Occupational Health and Safety (OHS): In recent years, Turkey has undergone a reform to improve its national OHS system by adapting a set of international and regional standards into its national level requirements for the prevention of occupational risks. In addition to ILO ratification, Turkey has also passed a law specific to OHS (i.e. Law No. 6331 on Occupational Health and Safety) in 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. The Ministry of Labor, Family and Social Services has a Labor Inspectorate that enforces the law and conduct regular OHS and labor audits. The construction contractors shall be subject to national OHS legislation. Additionally, OHS management system, that may be required by the borrower will be analyzed during the preparation stage. For the operation phase OHS issues, MoTI has a separate regulation on railway safety which defines risk management including measures to minimize the risks in railway operation as well as regulates significant accidents. The borrower will develop and include in the ESMP and bidding documents a Health, Safety and Environmental (HSE) plan in line with World Bank Group Environment, Health and Safety (EHS) Guidelines. It will be ensured that the more stringent standards are used throughout the project. The borrower will also ensure that the contractor develops an Occupational Health and Safety Plan which will include risk assessment, procedures on safety, training, monitoring, incident investigation and reporting. Contractors will be contractually required to monitor and enforce safety plans.

ESS3 Resource Efficiency and Pollution Prevention and Management

The project is not considered as a water intensive project given its nature and therefore no major risks related to water use or pollution is anticipated. For material supply, the existing and/or nearby quarries will be utilized to the extent possible. The electrification for Cukurova and Filyos railways will be supplied from the closest possible existing ETLs. The major pollution related risks of the planned projects are improper waste and soil management, adverse impacts of construction activities on nearby water bodies, air quality impacts of construction and operation phases. In addition, transport of hazardous wastes during operation phase is a relevant issue. These anticipated impacts will be analyzed and assessed in detail during the ESA studies before appraisal. Water, air quality and soil mitigation and monitoring plans will be part of the ESA documents and the contractors will be responsible for ensuring that the mitigation and monitoring measures are implemented on site. During operational phase of the project, use of



pesticides can be required for railway vegetation clearing in the scope of maintenance works. More information on pest application practices will be evaluated during project preparation, and if necessary an integrated pest management plan will be prepared as a part of ESA documents.

ESS4 Community Health and Safety

Community related impacts of railways and roads are associated with operational phase noise and air emissions, traffic management and temporary blockades, and labor influx associated disturbance to local communities and labor camps management. The ESA documents (including stakeholder engagement documents) will identify stakeholders and the likely impacts of construction and operational phase community health and safety issues, mitigation measures, monitoring and reporting requirements. The site-specific ESAs will also assess the potential scale and risk due to natural hazards associated with floods, earthquakes, landslides, and avalanches and emergency preparedness and response plans (EPRPs) to be prepared for both construction and operation phases will address specific risks identified, subsequently. Further, as appropriate, a separate Community Health and Safety (CHS) plan will also be prepared (as a part of the ESAs and relevant ESA documents) to address impacts/risks on: (i) human and livestock; (ii) HIV/AIDS; GBV. The site-specific Traffic Management Plans (TMP) to be prepared will cover management of traffic safety risks, accident prevention, training programs, relevant stakeholder engagement activities and site safety awareness and access restrictions. Labor influx: Although not determined yet, it is considered that already existing camp sites in nearby construction areas of other entities will be utilized for both of the sub-projects. It is foreseen that a minimum of 100 workers will be employed and will use the camp site accommodation. It is anticipated that technical and skilled staff will be utilizing the accommodation facilities on site and local people will be preferred to the extent possible as unskilled workers. The labor influx risks and details will be assessed within the scope of ESA studies. The Contractor will be required to appoint designated community liaison persons as part of the CHS plan who will keep local communities informed of project implementation schedule, expected impacts and other issues of interest for them, and receive grievances or feedback from them. No utilization of designated security personnel is foreseen for road and railway construction and operation phases.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The PIU has made efforts to avoid environmentally sensitive locations, agriculturally significant and residential areas as much as possible while planning the sub-project railway routes. While the expropriation plans have not been prepared yet, economic displacement is likely and limited physical relocation may be possible, if it cannot be avoided. State forest land, pasture land, treasury land and private lands are the types of lands likely to be impacted under the project. The DG of Infrastructure Investments will be the main land rights entity/authority for preparing expropriation plans and implementing the expropriation process. Although the PIU has no experience with the Bank's operational and safeguards policies, they have led many linear projects involving resettlement that have resulted in expropriation in various mega projects, such as highways, airports, Eurasia Tunnel project which has also received international finance. Therefore, the PIU is aware of international standards but will need the Bank's support to implement the ESF. The PIU will be the first public implementing agency in Turkey to implement the ESF. The land acquisition strategy of DG of Infrastructure Investments is based primarily on pursuing negotiated settlements, followed by a legal court process should negotiations fail. The PIU does not expect to resort to urgent expropriation procedures within the project. The severity of impacts are confined primarily to the right of way and sub-station sites. Permanent land acquisition will involve - i) a piecemeal approach along the route; and ii) one time acquisition for fixed structures



mainly on pasture and private lands. The maximum width of railway ROW is planned to be 40 meters in Cukurova railway sub-project and 60 meters in Filyos railway sub-project. The RoW will require permanent land acquisition where ownership rights will be established. Permanent land acquisition will also be required for stations (which are small, fixed structures) - 5 stations in Cukurova railway and 2 stations in Filyos Port/Industrial Zone connection. The villages in the area of influence of the Cukurova and Filyos railway sub-projects are Yukari Burnaz and Asagi Burnaz, and Gokceler, Sazkoy and Asagi Ihsaniye, respectively. In Cukurova railway, though no physical displacement is expected in Yukari Burnaz the railway is expected to result in loss of land, restrictions on land use, and loss of land-based livelihoods. Animal husbandry, agricultural and apiculture are among the main economic activities of the communities that may result in livelihood impacts. The most affected agricultural lands are covered with citrus (mainly orange) trees, which are economically important for the livelihoods of the communities in that region. Further, field visits indicate that physical relocation of a business (a coal storage facility in the southern section of the route towards Yumurtalik near the free zone) is expected under the Cukurova railway sub-project. The facility comprises of a large storage area, 2-3 small administrative buildings, a conveyor system to load coal and a large parking lot for trucks. The business will need to be relocated elsewhere. The anticipated physical displacement of this facility will require a RAP to be prepared for the project in Cukurova Region. The RAP will include information on the regulatory framework on resettlement and provide means and actions to bridge the gaps between national law and Bank standards. An entitlement matrix which covers physical displacement actions and compensation measure will be included in the RAP along with a corresponding budget. In Filyos Port/Industrial Zone connection, Sazkoy is already being affected from the Filyos port project which is currently under construction. The land-based impacts are expected to be similar to those in the Cukurova railway route except there are no impacted businesses. Currently, neither of the sub-projects' expropriation plans are complete, so the number and profile of affected land users and amount of land required is not known at this stage. The Zonguldak Filyos project will require a LAP to be prepared since there will be no physical displacement. Other possible components of the Project that may require land acquisition are the electrification systems (for Cukurova railway sub-project), an ETL that will connect to an existing substation (TEIAS 16th region İkiizler Substation). The need for access roads has not been determined yet. There will not be a need for additional storage areas during construction. The RAP and LAP for these two sub-projects will be prepared by the Borrower prior to appraisal as both designs of projects are expected to be ready before appraisal. The reports will look into multiple land impacts and undertake socio-economic baseline studies with the affected communities and assess the potential vulnerabilities specific to the projects. For the construction of the 2-3 LMCs to be identified during implementation, the Borrower will carry out Feasibility Studies during implementation based on the TOR acceptable to the Bank, and prepare site specific Land Acquisition/Resettlement Action Plans based on the result, in order to ensure their compliance with the ESS5. TOR for the FS will be prepared and cleared by the Bank before Appraisal. The Bank's no objection will be required for the inclusion of the construction of the above mentioned 2-3 LMCs within the project scope.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Construction of railway connectivity structures may affect forest ecosystems, including natural habitats and areas of conservation value. According to initial assessment of the WB officials, Filyos railway site partially overlaps with the Amasra Coast IBA - an internationally recognized protected area. The qualifying specie is European Shag, which is categorized as Least Concern (LC) according to the IUCN Red List. Furthermore, the railway and road route are passing through forest lands and pasturelands. Given all these aspects and that there is no biodiversity assessment conducted for the site before, a detailed assessment for biodiversity values of the region (for any protected species



with national or international standards, or endemic species etc.) is required to be implemented as a part of the ESA studies before appraisal. According to the results, a biodiversity management plan might be needed to protect the status of the ecosystems. It should also be noted that the forest ecosystem was deteriorated to a great extent due to port construction activities. Within the scope of the assessment, the deterioration of the existing habitat due to port construction will also be considered and assessed as cumulative impacts on the biodiversity values of the site. There is no internationally or nationally protection status for the site of Cukurova railway. The biodiversity values will be assessed within the scope of the ESA studies and necessary actions will be included in the subsequent ESA documents. At the design stage of the currently unknown project sites, protected areas will be designated as no-go areas and be avoided within the scope of the ESA documents to be prepared.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

No known groups falling under definition of ESS7 in Turkey.

ESS8 Cultural Heritage

In Cukurova railway, the consultant company is handling the official communication with the Provincial Directorate of Culture and Tourism for ensuring the protection of Isos Antique City during construction activities. The results will be reflected in the ESIA study for this sub-project. In Filyos railway, the communication with the Provincial Directorate of Culture and Tourism is also conducted. In this respect, it was agreed that a radar survey will be conducted under the control of an archaeologist and if any significant cultural values are identified the contractor company will inform the Provincial Directorate to take required actions for ensuring protection of the tumulus. Considering the above mentioned conditions for both sites, a cultural heritage management plan will be established before appraisal. In this context, Turkish laws and practices are similar to the WB requirements. Since the national regulations on the conservation of cultural properties are strict, it is not anticipated that any additional requirements would arise under WB ESS8 requirements. Nevertheless, a chance finds procedure including responsibilities for managing accidentally discovered or chance find cultural artifacts will be prepared. Additionally, all relevant official letters will be annexed to the site-specific safeguard documents to be prepared. MoTI is responsible for avoiding or mitigating impacts on physical or cultural resources of the financed projects. Therefore, MoTI will not proceed with project funding until all requirements of the Turkish legislation are met.

ESS9 Financial Intermediaries

Project does not involve any financial intermediaries.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No
OP 7.60 Projects in Disputed Areas	No

Public Disclosure



III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

A. Is a common approach being considered?

No

Financing Partners

No financial partners are involved at this stage.

B. Proposed Measures, Actions and Timing (Borrower’s commitments)

Actions to be completed prior to Bank Board Approval:

- 2 ESIA’s for Cukurova and Filyos railways including SEPs
- RAP for Cukurova and LAP for Filyos
- Labor Management Procedures
- Biodiversity Management Plan (if needed)
- Community Health and Safety Plans
- Traffic Management Plans
- Emergency Preparedness and Response Plans
- 2 Cultural Heritage Management Plans
- ToRs for feasibility study of the 10 LMCs
- ESCP

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

Preparation of site specific environmental and social assessments (ESIAs/ESMPs, SEPs, BMPs, etc.) and land acquisition documents (RAPs/LAPs) for the 2-3 LMCs to be selected among the 10 TA studies. WB will prior review and its clearance will be required for all E&S documents.

Consultation and disclosures of E&S documents and RAPs/LAPs of the LMCs to be identified (for construction) during implementation phase

Recruiting and retaining environmental and social specialists within the PIU during project preparation and implementation phases.

Inclusion of E&S instruments and ESMPs (as a part of ESIAs) in the bidding documents of Cukurova and Filyos sub-projects

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

16-Oct-2019

IV. CONTACT POINTS

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Public Disclosure



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Borrower/Client/Recipient

Implementing Agency(ies)

Implementing Agency: Ministry of Transport and Infrastructure

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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Practice Manager (ENR/Social)	Madhavi M. Pillai Recommended on 26-Jul-2019 at 10:24:52 EDT
Safeguards Advisor ESSA	Nina Chee (SAESSA) Cleared on 31-Jul-2019 at 08:57:25 EDT

Public Disclosure