



# Concept Environmental and Social Review Summary

## Concept Stage

### **(ESRS Concept Stage)**

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**BASIC INFORMATION**

**A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Turkey	EUROPE AND CENTRAL ASIA	P172562	
Project Name	Turkey Resilient Landscape Integration Project (TULIP)		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Environment, Natural Resources & the Blue Economy	Investment Project Financing	9/28/2020	12/17/2020
Borrower(s)	Implementing Agency(ies)		
Republic of Turkey	General Directorate of Forestry (Ministry of Agriculture and Forestry)		

Proposed Development Objective(s)

The project development objective is to strengthen integrated management of natural resources at the landscape level and increase access to climate-resilient infrastructure to communities in the targeted areas of Ordu Province.

Financing (in USD Million)	Amount
<b>Total Project Cost</b>	<b>300.00</b>

**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]**

The proposed project will support the Government of Turkey (GoT) in addressing the multitude of environmental challenges facing the Bolaman Basin in the Easter Black Sea, while enhancing the livelihood security and resilience of local communities against the risks and impacts of climate-induced landslides, flooding, and drought. The project will adopt an integrated landscape management approach at the sub-basin scale (Boloman) to achieve these objectives. Building on GoT and the Bank’s previous experience in watershed management, this project will design a participatory planning process to take into account inputs from different stakeholder groups, allowing for the coordination and



integration of solutions among different government agencies as well as between government and local stakeholders. The project will also deploy integrated green and gray infrastructure solutions as both short-term and long-term responses to mitigate the risks of landslides, floods, and drought, and enhance climate resilience of the local population and ecosystems. This integrated approach of the project will provide valuable lessons and experiences as well as innovative elements that can be applied to other basins with similar problems in Turkey. Component 1 will finance a variety of green infrastructure measures such as the rehabilitation of natural ecosystems (forests, pastures, wetlands) and erosion control works; combined with sustainable and climate-smart agricultural practices and value chains, and livelihood diversification activities. Component 2 will finance infrastructure systems for water supply, wastewater treatment, and flood, landslide and sediment control, and the rehabilitation of rural road networks to be climate and disaster-proofed. Component 3 will finance technical assistance for developing an integrated Natural Resources Management model along with associated institutional coordination and capacity building structures, and support for project management including environmental and social aspects.

#### D. Environmental and Social Overview

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

The project will be implemented in the Bolaman Basin located within the Ordu-Giresun sub-basin of the Eastern Black Sea (EBS) Basin in the North-East part of Turkey. There are several National Parks (e.g. Ulugol, Agaçbaşı, Çinarsuyu, Kuzalan and Yedideğirmenler) in the provinces of Ordu and Giresun. This area, known for its historical and cultural heritage, is severely affected by landslides, flooding, and degradation of natural resources affecting the well-being and livelihoods of the local population. The Bolaman Basin has its distinct geographical boundaries and hydrological structure and covers an area of 158,886 hectares almost entirely within the Ordu Province. With a population of 255,000, most of its residents live in rural areas across 97 villages, 53 of which are forest villages. Over 58% of the basin area is agricultural land, of which 39% is cultivated and 19% is pasture land. Forest land has been converted to hazelnut groves over the years and currently accounts for 28.9% of the basin area. Bolaman experiences soil erosion, degradation of forest ecosystems, surface water pollution, landslides, drought and floods. Estimated annual point and non-point source nitrogen and phosphorous pollution recorded in 2012 was the highest in EBS (6,866 tons/year and 421 tons/year, respectively). Drinking water in Bolaman is mostly supplied from surface water, and pollution of over 75 percent of surface water bodies seriously threatens the availability of drinking water sources for communities in Ordu. Turbidity problems experienced in heavy precipitation events and water level declines during episodes of drought further impede access to healthy drinking water. Ordu also experiences natural disasters that have caused the loss of life and properties to local communities. Landslides and floods due to excessive rainfall in 2016 and 2018 caused substantial damage to roads, settlements, bridges and agricultural and forest areas in Ordu. Recent landslide events resulted in the complete collapse of 15 and substantial damages to 30 houses and a flood in 2018 led to the collapse of a large bridge in Ünye, Fatsa, and Çaybaşı districts. The road system in the basin is impacted by these disaster events, preventing access to markets and certain isolated settlements. Integrated solutions to the severe and multifaceted problems in Bolaman Basin are urgently needed as this area has become a priority for the GoT. It also presents an opportunity for piloting innovative elements for INRM that can generate valuable lessons for other basins in Turkey. Use of coal for heating undermines air quality.

The EBS has the 3rd highest poverty rate (20.9%) in Turkey combined with a multitude of environmental challenges. Ordu Province is the biggest hazelnut producer in Turkey. In 2018, Ordu produced 180,397 tons of hazelnut, accounting for 35 percent of total hazelnut production in Turkey. Hazelnut is almost the only source of income in all villages; the remaining comes from small-scale subsistence farming and livestock activities. The Bank study on forest



communities in Turkey (2017) indicated that the poor are more forest dependent because of their lack of alternative income options, a low level of productive assets and social capital (e.g. members of a cooperative) and high vulnerability. As a result, they have limited capacity to diversify income sources and move to higher-return economic activities - such as agriculture and owning livestock. The study also found that the most forest dependent individuals in Turkey are in the bottom 20% of the income quintile. Out-migration has also resulted in a rapidly declining and ageing population in forest villages. Therefore, vulnerable groups include elderly people, poor households, women headed households, and children and young persons engaged in hazelnut production. The ESA process will assess the presence of additional potential vulnerable groups which may be disproportionately impacted by the Project.

#### D. 2. Borrower's Institutional Capacity

The lead implementing agency is the General Forestry Directorate (OGM) of the Ministry of Agriculture. The other participating agencies include the State Agency on Irrigation and Amelioration (DSI), General Highway Directorate (KGM) of the Ministry of Transport, and the General Directorate of the Agricultural Reform (TRGM) of Ministry of Agriculture and Forestry (MoAF) which have different level of technical capacity to carry out key environmental and social assessment functions and implement the project to meet the objectives of the ESF. In the past the OGM, being differently organized under the Ministry of Forestry, was involved in the implementation of the Bank-funded Eastern Anatolian Watershed Rehabilitation Project and Northern Forestry Project. However, the current team has limited experience with Bank-financed projects, particularly with respect to Bank's Environmental and Social Framework (ESF) and the requirements of the respective Environmental and Social Standards (ESSs) applied to the project. KGM and DSI have dedicated teams at the HQ who are responsible for conducting environmental and social impact assessment of their investments (projects) while the provincial and regional level staff is responsible for monitoring and reporting on managing environmental and social risks and impacts and for implementation of mitigation measures with respect to national requirements. Furthermore, TRGM and OGM have limited in-house experience for assessment and managing of environmental and social risks and impacts. All of the agencies use consultancy services in case additional E&S support is required for any of the projects implemented under the supervision of the agencies. DSI has specific experience working with the World Bank in Irrigation Modernization project in Turkey (P158418) which is implemented under safeguard operational policies. The project is under implementation with a satisfactory safeguards rating. However, the ESF and its requirements are new to all of the agencies planned to be involved in the implementation of this project.

In order to ensure day-to-day coordination of the project, a PIU will be established within OGM and will include a dedicated multi-disciplinary team of project management, technical, financial management, procurement, environmental and social specialists with qualifications satisfactory to the Bank. At the local level PIUs will be established within the Provincial departments of each participating agency to strengthen implementation capacity in the field. At the early stage of the project implementation the central and provincial PIUs will be trained on the ESF and strengthened by hiring dedicated social and environmental specialists. Specific measures to enhance the environmental and social management capacities of the PIUs, such as number of environmental and social staff and consultants and the scope and modality of ESF training, will be further evaluated by the Bank during the project preparation.

Activities supported under Component 3 will also aim to strengthen the capacity of the PIU to implement ESF requirements, citizen engagement activities and GRM.

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



**A. Environmental and Social Risk Classification (ESRC)**

Substantial

**Environmental Risk Rating**

Substantial

The environmental risk of the project is rated Substantial. The project interventions under Component 1 will envisage improvement of green infrastructure, such as introduction of sustainable and climate-smart agricultural practices, livelihood diversification, provision of habitat to enhance biodiversity, restoring ecosystems to provide resources for income generation and critical services for soil retention and water regulation, and buffering against landslides and floods. Eventually these interventions will have highly positive environmental effect on the project area, however, their design and implementation will require careful consideration of risks related to the identification of ecosystems to be restored, implementation of civil works for soil retention and water regulations, risks of potential alteration of water regimes, etc. Green infrastructure will be designed in conjunction with gray infrastructure to optimize the functionality, cost-effectiveness, and resilience of the integrated natural and built system. Such grey infrastructure will be supported under Component 2 and include construction of multipurpose reservoirs for effective use and regulation of water resources in the basin; flood control structures, precipitation levees below 15 m, and sediment control structures; disaster emergency maintenance of existing infrastructures and repair works; drinking water infrastructure systems rehabilitation and development ; and wastewater infrastructure systems rehabilitation and development. The risks of the implementation of civil works on grey infrastructure are those related to the generation of various types of wastes, dust and noise, non-compliance with the requirements of occupational health and safety (OHS), disturbance to biodiversity as well as temporary disturbance to neighboring communities. Those risks are temporary, will have limited footprint and can be effectively avoided, minimized or mitigated subject to establishment of a proper environmental and social management system within the project. Due to the wide range and considerable scale of the proposed interventions (both green and grey), as well as limited environmental management capacity of the lead implementing agency, the project environmental risk is rated Substantial.

**Social Risk Rating**

Substantial

The social risk is rated as Substantial mainly due to the contextual risks associated with the project and the capacity of the multiple implementing state agencies to implement the ESF. The project design includes multiple implementing state agencies responsible for the implementation of different project components, who have limited capacity to implement the ESF, including those who have never worked before with the World Bank. Such diversified institutional arrangement may increase the risk of ESF mitigation measures implementation. Activities under Component 3 aim to increase the ESF implementation capacity of these agencies.

Contextual risks include child labor associated with the hazelnut production in Turkey, and the use of seasonal migrant workers in the agriculture, including hazelnut. The relevance and significance of these risks within the project scope will be assessed during ESA process carried out during project preparation. The project will support diversification of agricultural production to reduce land areas used for hazelnut cultivation.

The proposed investments under Components 1 and 2 may require land acquisition and economic and physical displacement of a small scale, and may generate temporary community health and safety risks and impacts, and OHS risks among the civil works contractors. Labor influx risk is estimated as low as it is anticipated the the workforce will

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be Turkish with efforts to use local workforce for unskilled jobs. Labor related risks associated with the civil works contractors and their compliance with ESS 2 are assessed as moderate. The risk of forced labor is not expected. SEA/SH risks associated with civil works are assessed as low.

The project design will include measures to make positive impacts on vulnerable groups who depend on rural and agricultural economy, including women led households.

The project will require extensive stakeholder engagement program, especially in relation to rural livelihoods and sustainable agriculture activities which will target forest villages. In addition, the project will include coordination of multiple state agencies, each in charge for different project components, which may increase the complexity of stakeholder engagement.

## **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 standard is relevant to the project. The environmental impacts associated with the establishment, rehabilitation and/or construction of green and grey infrastructure under Components 1 and 2, include those associated with the need to manage various types of waste streams, to avoid alteration of water regimes and disturbance to ecosystems, protect biodiversity, ensure OHS for workers and safety of neighboring communities as well as to minimize dust, noise and vibration impacts due to construction activities in the project area. As the project will also support the diversification of agricultural production to reduce land areas used for hazelnut cultivation, there might be a risk of increased use of pesticides to increase productivity while reducing the area. The overall nature of investments is known at this stage of the project preparation, however, specific investments will be determined under the feasibility study to be undertaken during the project preparation. The engineering design as well as the details of the locations and specific environmental and social risks and impacts will be determined during the project implementation. Since the project interventions will include a wide range of green and grey infrastructure improvements across the Bolaman Basin area, the environmental and social challenges of the Basin will be assessed under the Strategic Environmental and Social Assessment (SESA), which will be carried out prior to the project appraisal. SESA will be an input to the development of the Bolaman Basin Master Plan (BMP) in the first year of project implementation. The priority sub project investments will be identified through the feasibility study. Findings of SESA will guide further identification and prioritization of the project investments.

In order to set up procedures, arrangements and responsibilities for the identification of sub-project-specific impacts and development of respective ESF instruments (Environmental and Social Impacts Assessment - ESAs or Environmental and Social Management Plans - ESMPs) during the project implementation, an Environmental and Social Management Framework (ESMF) will also be prepared prior to the project Appraisal. The ESMF will be disclosed by the Borrower and consulted prior to the project appraisal. ESMF will include guidance on screening



project activities for environmental and social risks and for including respective mitigation measures into the ESMPs. The screening mechanism will be set so that to exclude the activities which can potentially be associated with intensive use of pesticides. ESMF will provide principles of mitigation hierarchy to be applied and methodology for monitoring effectiveness of mitigation tools. The ESMF will also provide guidance for the introduction of IPM principles for improved agricultural practices, and for incorporation of pest management mitigation measures into respective ESMPs.

Site-specific ESF instruments to be developed during the project implementation, will also be disclosed and consulted before tendering process for civil works. Site-specific ESF instruments will set environmental and social requirements to contractors and supervision consultants for sub-projects including the associated facilities, and will become an integral part of the bidding packages for respective sub-projects.

Some of the potential activities under Component 1 and 2 are subject to national Environmental Impact Assessment (EIA) Regulation. During the initial meetings with the relevant agencies, it was understood that none of the potential activities of OGM and TRGM within the scope of the project are subject to EIA Regulation. The activities proposed by DSI and KGM are subject to national EIA Regulation however EIA procedure has not been initiated for any of the sub-projects except the ones that were approved by the government before the EIA Regulation was put in force. It is anticipated that the national EIA procedure will be applied for all the sub-projects that will be subject to approval, during the project implementation phase.

While the overall social impact of the project will be positive, such as protecting local communities from floods and landslides, and enabling rural and agricultural development opportunities, there are social risks and impacts associated with infrastructure investments and livelihood development activities under Components 1 and 2. The proposed investments under Components 1 and 2 may require land acquisition and economic and physical displacement of a small scale. To address these risks the Borrower will prepare Resettlement Policy Framework (RPF), and potentially Process Framework (PF) in case the project activities would necessitate restriction of access to timber and non-timber forest products in designated forests. The need for PF will be determined by appraisal. Civil works may generate temporary community health and safety risks and impacts, and OHS risks among the civil works contractors. Labor influx risk is estimated as low as it is anticipated the workforce will be Turkish with efforts to use local workforce for unskilled jobs. Labor related risks associated with the civil works contractors and their compliance with ESS 2 are assessed as moderate. The risk of forced labor is not expected. SEA/SH risks associated with civil works are assessed as low.

Contextual risks associated with the project include child labor, which is often associated with the hazelnut production in Turkey, and the use of seasonal migrant workers in the agriculture, including hazelnut. If such seasonal workers (migrant or refugees) would be at all present in the project, it is not expected that they would be project workers, but rather beneficiaries. The project design will include support to diversification of agricultural production to reduce land areas used for hazelnut cultivation. The relevance and significance of these risks within the project scope will be assessed during SESA process carried out during project preparation. The SESA will include a social assessment component which will analyze social risks and impacts and opportunities resulting from investments in the basin. The analysis will include identification and assessment of stakeholders, assessment of the national legal and institutional framework for addressing social risks, assessment of benefits of proposed investments and proposed alternatives, socio-economic baseline of local communities in the Ordu province, mapping of land use,



sources of livelihoods and prevalent economic activities, risk of child labor in hazelnut farming and other sectors of agriculture, identify specific vulnerable groups that may be disproportionately impacted, At this stage, it is expected that vulnerable groups would include women headed household, elderly people, poor households, young persons engaged in hazelnut cultivation and agriculture, and people dependent on forest products. The social assessment will identify any other vulnerable groups such as ethnic minorities, refugees, persons with disabilities, etc. The social assessment shall also determine if there is a need for differentiated impact measures for affected groups in relation to income generation and potential loss/gain from value chain activities associated with Sub-component 1.2 Sustainable agriculture and value chain activities.

A rigorous stakeholder mapping will be conducted to inform the Stakeholder Engagement Framework (SEF) and Stakeholder Engagement Plans (SEPs), as well as core project activities. Findings of SESA will inform livelihood support activities and alternatives to hazelnut production. SESA will be prepared and consulted by project appraisal. Project area is known for its historical and cultural heritage. The ESMF and subsequent ESMPs will include chance find procedure. The Ministry of Culture will be consulted to verify the presence on any cultural heritage sites in Ordu province.

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

Borrower's Framework will not be used for the project.

**ESS10 Stakeholder Engagement and Information Disclosure**

All activities will take place in the Ordu province. However, the exact locations of sub-projects, which will be implemented by various implementing agencies, is not known at this stage. The Borrower will prepare the SEF (Stakeholder Engagement Framework) which will outline the engagement approach for both project affected parties (PAPs) and other interested parties (OIPs). SEF will outline general principles and a collaborative strategy to identify stakeholders and plan for an engagement process in accordance with ESS10. Each implementing agency will prepare Stakeholder Engagement Plans (SEPs) for the set of sub-projects (investments) they will be responsible to implement. These SEPs will be prepared, disclosed and consulted upon before the start of any civil works. The initial assessment indicated that the direct stakeholders include the Ministry of Agriculture and Forestry's (MAF) General Directorate of Forestry (OGM), the General Directorate of Agricultural Reform (TRGM) and the State Hydraulic Works (Devlet Su İşleri - DSI), the Directorate General for Highways (KGM) under the Ministry of Transport and Infrastructure, the General Directorate of Water Management (GDWM) under the MAF, the Ordu Metropolitan Municipality General Directorate of Water and Sewerage Administration (OSKI), and the Disaster and Emergency Management Presidency (AFAD); and local municipalities in the Ordu province.

It is estimated that directly affected people are local business associations, forest villages, local farmers, communities who depend on hazelnut production, and people who will benefit from rural development and livelihood support activities, infrastructure investments, and flood and landslides protection measures. Additional stakeholder groups will be identified during project preparation, and special attention will be dedicated to the identification of vulnerable groups among stakeholders.

The OGM carried out initial stakeholder engagement activities in the Ordu province, and local authorities, village heads, and representatives of the local business associations (such a bee keepers) have been informed and consulted about potential activities under the project.





Other potential stakeholders are Ministry of Finance, Ministry of Labor, local organizations and NGOs. The SEF and subsequent SEPs preparation process will identify additional direct and indirect stakeholders, particularly at the local level.

The SEF will lay out a strategy to identify and map key stakeholders. The SEP will present modalities of engagement that are tailored to the needs and characteristics of each stakeholder group. The implementing agencies will ensure that all consultations are inclusive and accessible (both in format and location) and carried out through channels that are suitable in the local context. The SEF and specific SEPs will be disclosed to the public, but continue to be updated throughout the implementation phase. The SEF will be prepared and disclosed prior to appraisal. If major changes are made to the SEF, a revised SEF will be prepared and publicly disclosed. Identified vulnerable and disadvantaged groups will be described in the ESMF. The Borrower will commit to the preparation of the ESMF and site-specific ESMPs in the transparent and participatory manner. This would include disclosure of these environmental and social management instruments while in draft, public consultation and feedback solicitation in the format most suitable for project-affected people and other interested parties, incorporation of relevant feedback and re-disclosure of the finalized documents.

The SEF will include Grievance Redress Mechanism (GRM) procedures to address all types of grievances, both environmental and social, that relate to the project.

## **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**

It is expected that the project will involve direct workers (PIUs members and consultants), contracted workers engaged in infrastructure investments and livelihood support activities, and primary supply chain workers engaged in the provision of construction materials. Engagement of community workers is not expected at this stage. Direct workers will also include civil servants. At this stage, it is not possible to determine the expected number of direct and contracted workers who will be involved in project implementation.

Risks related to child and forced labor are not expected within direct and contracted workforce. However, there is contextual risk of child labor in the hazelnut production and agriculture sectors in Turkey. In addition, these sectors engage seasonal workers, some of them migrant and refugees. The ESA process will determine if these risks would be associated with the specific activities supported within the the scope of the project. If such seasonal workers (migrant or refugees) would be at all present in the project, it is not expected that they would be project workers, but rather beneficiaries. In instances where ESA process determines that the risk of child labor is relevant within the project funded activities, then mitigation measures will be applied such as age verification procedure, inclusion of child labor prohibition in the grant agreements with beneficiaries, commitment of beneficiary firms and agriculture enterprises not to engage persons below the age of 15 in their activities, training on the prohibition of child labor. The risk of child labor within project funded activities will be assessed by appraisal.

In general, main labor risks associated with construction works in Turkey include long working hours and lack of compliance with OHS requirements. Labor Inspectorate in Turkey is responsible to ensure compliance with labor, OHS and social security laws.



Turkish Labor Code (No. 4857) is to large extent consistent with the ESS 2. Turkey ratified all the four Core ILO Conventions and OHS ILO Conventions. The main gap with ESS2 is related to the requirement for the grievance mechanism for workers. While the national legislation provides for Labor Courts to raise labor rights concerns, the Labor Code does not include specific requirements for workplace grievance mechanism. The Labor Code includes provisions to ensure contracted workers are paid, however, it does not include provisions regarding the selection, management and monitoring of contractors with regard to ESS2 requirements. Though, Labor Code applies to the types of workers who would be considered as contracted workers under ESS2 definition.

The minimum working age is 15 years and the law prohibits persons below the age of 18 years to work in hazardous occupations. Forced labor is prohibited by the Turkish Constitution. There is secondary legislation which regulates the employment of persons between ages of 15 and 18 years.

Law on OHS (No. 6331) governs workplace environments and industries (both public and private) and all categories of employees including part-time workers, interns, and apprentices. The legislation is comprehensive and is generally applicable across all sectors and many industries. The law is consistent with the requirements of the ESS 2. The partial gap exists in the requirement for the provisions of facilities – the law only requires provisions of canteens. The OHS law does not require an employer to prepare and overarching OHS plan.

The OGM will prepare a labor management procedures (LMP) and it will outline the potential number and categories of workers involved, and key labor risks. Civil works contractors will prepare contractors’ LMP. The LMP will also include GRM for direct and contracted workers. Draft LMP will be prepared before appraisal.

Implementing government agencies have internal mechanisms for their employees to raise workplace concerns including suggestion boxes and online platforms. These suggestions and complaints are reviewed by the internal strategy and audit units. The LMP will elaborate how these existing mechanisms can be adapted to meet the requirements of the GRM under ESS2.

While tendering of civil works, bidders will be required to submit Environment, Social, Health and Safety (ESHS) Code of Conduct prepared in line with Environment, Health and Safety Guidelines of the World Bank Group. Contractors engaged in the civil works will develop a Occupational Health and Safety Plans (which may be part of ESMP) which will include procedures on incident investigation and reporting, and will be in line with the WB Environmental Health and Safety Guidelines (EHSG). Contractors will be contractually required to monitor and enforce safety plans, and to comply with national labor and employment laws and ESS2.

### **ESS3 Resource Efficiency and Pollution Prevention and Management**

The standard is relevant to the project. While the project by its nature will result in the improved management of the use of resources (water, soils, landscapes), the implementation of the project interventions will be related to the use of resources such as water, electricity, sand, gravel, etc. The requirements of the standard will be considered by the project ESMF and addressed under the site-specific ESF instruments (including ESIA and ESMPs as relevant) , which will also provide for the measures to prevent or minimize pollution. The implementation of various types of green and grey infrastructure investments may cause generaiton of construciton wastes, other solid wastes and small amount of hazardous wastes. Depending on the nature of specific sub-project activities, mitigation measures may be



covered by site-specific ESIA's or ESMPs or developed as stand-alone plans (e.g. Waste Management Plan, Water Management Plan). These measures will be adopted during the project implementation. The interventions to support sustainable agricultural production can lead to the increased use of pesticides (while those will not be purchased under the project). Potential impacts associated with the use of pesticides will be addressed under the sub-project-specific ESMPs.

#### **ESS4 Community Health and Safety**

The standard is relevant because the implementation of the green and grey infrastructure interventions may cause temporary disturbance to the rural communities. Also, the operation of the green and grey infrastructure facilities may require implementation of measures ensuring community safety, such as restricted access to the sites, mitigation of noise and vibration impacts, provision of alternative pathways, etc. The requirements of the standards will be addressed under the project ESMF, while site-specific risk and impacts will be elaborated with appropriate mitigation measures to prevent or minimize the risks and impacts through site specific ESF instruments which shall be in line with the WBG Environmental Health and Safety Guidelines (EHSs).

Civil works contractors and state agencies implementing infrastructure investments under Components 1 and 2 will carry out community health and safety sessions during construction and rehabilitation works and will adhere to the requirements of site-specific ESMPs.

It is expected that the workforce which will be engaged during project implementation would be local. Establishment of work camps is not expected. The SEA/SH risk assessment conducted in line with the World Bank's SEA/SH Guidance Note found that the project's SEA/SH risk is Low and the project will implement required mitigation measures. Any community awareness-raising sessions related to SEA/SH will be carried out within the scope of environmental and social sessions. The Borrower and civil works contractors will prepare and implement the Code of Conduct for workers.

It is not expected that the project would engage security personnel. However, principles of the World Bank Good Practice Note on Use of Security Personnel will be followed with respect to the forestry enforcement activities which may be supported under the project.

For the construction of water reservoirs, flood control facilities, precipitations levees, etc., dam safety measures will be implemented as envisaged by the requirements of this standard. As a minimum, Good International Industrial Practices (GIIP) will be adopted and implemented for the design, construction, supervision and operation of the facilities. The types and capacities of such facilities will be determined during the project implementation as part of the detailed design, and specific impacts and mitigation and safety measures will be defined by site-specific ESF instruments.

#### **ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

While forests are located on state-owned land, impacts on privately-owned land and assets related to investments under Components 1 and 2 cannot be excluded. Construction and rehabilitation of roads, waste water treatment



plant, water and sewage networks, and flood protection and landslide protection measures may include temporary or permanent land use restriction, land acquisition or removal of assets and structures from the land, and in some instances physical relocation. The exact scale and scope of land acquisition required for infrastructure investments is currently not known, since the exact locations of the project activities have not been determined yet. The project will aim to minimize impacts on privately-owned land.

The RPF, which will be prepared and disclosed before appraisal, will include procedures for land acquisition, land use restriction, involuntarily resettlement and associated compensation and livelihood restoration measures.

If the project support under Sub-Component 1.1 Green infrastructure and rural livelihoods is found to result in restriction of access to timber and non-timber forest products in designated forests, a Process Framework (PF) will be prepared to address the associated risks and impacts. The need to prepare PF will be determined by project appraisal.

#### **ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

The standard is relevant because the project activities, being implemented in rural areas and aimed at restoring and management of rural ecosystems and ecosystem services, and enhancing rural habitats, might have adverse impacts on biodiversity and rural livelihood resources and the the protected areas (such as National Parks located beyond the Bolaman basin but within the Ordu and Giresun provinces and, as such, might be part of the project area. SESA will include assessment of the current status of biodiversity in the Bolaman Basin area. SESA report and ESMF will provide findings of this assessment and identify all sensitives/protected areas and habitats which would fall under the project area. The related specific risks will be addressed in the framework of site specific ESF instruments (ESIAs and ESMPs) to be prepared during the project preparation. Depending on the nature and scale of proposed sub-projects, biodiversity management / conservation / protection plans might be prepared as a stand-alone instrument. Screening mechanism will be put in place to exclude activities which are likely to impact critical habitats.

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

This standard is not relevant because no Indigenous Peoples are known to be present in Turkey.

#### **ESS8 Cultural Heritage**

The standard is relevant because the project area is known for its historical and cultural heritage. Specific potential impacts will be determined during the development of sub-projects. As a precautionary measure, the ESMF will contain a detailed description of the steps (along with arrangements and responsibilities) to be taken in case of chance finds. Therefore, it would be important to include into ESMF a requirement to screen sites selected for project intervention against presence of physical cultural monuments and to undertaken forest management planning in respectively informed manner. In addition, the ESA process carried out during ESMF preparation and consultation and stakeholder engagement, should include information on traditional land use which may be viewed as a cultural ecosystem service and intangible cultural heritage of local communities. It will be determined if the project need to engage cultural heritage expert during stakeholder engagement process and to provide guidance on intangible



cultural heritage of local communities. Such guidance should be provided in the ESMF and relevant mitigation measures included in the site-specific ESMPs.

The project will also ascertain, by appraisal, if there's known presence of cultural heritage sites where scale and the nature of the risk and impacts of this project might warrant the preparation of stand-alone Cultural Heritage Plan.

**ESS9 Financial Intermediaries**

This standard is not relevant because the project will not use Financial Intermediaries (FIs)

**C. Legal Operational Policies that Apply**

**OP 7.50 Projects on International Waterways** No

**OP 7.60 Projects in Disputed Areas** No

**III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE**

**A. Is a common approach being considered?** No

**Financing Partners**

NA

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

**Actions to be completed prior to Bank Board Approval:**

1. Preparation, disclosure and consultation on the SESA
2. Preparation, disclosure and consultation on the ESMF
3. Preparation, disclosure and consultation on the SEF
4. Preparation, disclosure and consultation on the RPF . The need to develop PF will be determined during project preparation
5. Preparation and disclosure of the Borrower's LMP
6. Preparation, agreement between the Borrower and the Bank on and disclosure of the ESCP

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

- Establish PIU at the OMG, and provincial PIUs in the project area
- Build E&S capacity of the central and provincial PIUs
- Preparation, disclosure and consultation of the Bolaman Basin Master Plan (BMP)
- Development, disclosure, consultation on - and implementation of site specific ESIA's and/or ESMP's. Preparation of contractors' ESMP (which may include Waste Management Plan, Occupational Health and Safety Plan) satisfactory to the Borrower and the Bank prior to mobilization.

Public Disclosure



- Preparation, disclosure, consultation on- and implementation of SEPs including maintaining operational Grievance Redress Mechanism (GRM)
- Development, disclosure, consultation on - and implementation of site-specific Resettlement Plans (RP), if required
- Preparation of contractors' LMP and adherence to it during performance of civil works including maintaining GRM for workers
- Preparation of contractors' ESHS Code of Conduct and adherence to its principles

**C. Timing**

**Tentative target date for preparing the Appraisal Stage ESRS**

25-Sep-2020

**IV. CONTACT POINTS**

**World Bank**

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**Borrower/Client/Recipient**

Borrower: Republic of Turkey

**Implementing Agency(ies)**

Implementing Agency: General Directorate of Forestry (Ministry of Agriculture and Forestry)

**V. FOR MORE INFORMATION CONTACT**

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**VI. APPROVAL**

Task Team Leader(s): Stavros Papageorgiou, Canan Yildiz

Public Disclosure



Practice Manager (ENR/Social)

Satoshi Ishihara Recommended on 06-Apr-2020 at 15:00:7 EDT

Safeguards Advisor ESSA

Nina Chee (SAESSA) Cleared on 06-Apr-2020 at 16:28:56 EDT