

Türkiye: Post-Earthquake Micro, Small and Medium Enterprises (MSME) Recovery project (P181068)

Appraisal Environmental and Social Review Summary Appraisal Stage (ESRS Appraisal Stage)

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BASIC INFORMATION

A.	Basi	ic I	Proj	ect	Data
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Country	Region	Project ID	Parent Project ID (if any)
Turkiye	EUROPE AND CENTRAL ASIA	P181068	
Project Name	Türkiye: Post-Earthquake Micro, Small and Medium Enterprises (MSME) Recovery project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Finance, Competitiveness and Innovation	Investment Project Financing	5/8/2023	6/13/2023
Borrower(s)	Implementing Agency(ies)		

Proposed Development Objective

The PDO is to support business continuity and sustainable growth of viable MSMEs in earthquake-affected areas

Financing (in USD Million)	Amount
Total Project Cost	450.00

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

Yes

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

The Project will provide US\$450 million in the form of reimbursable financing to eligible MSMEs affected by the severe earthquakes in Feb 2023. The Project targets MSMEs that have been negatively affected by the earthquake but were financially viable before the earthquake and are likely to survive the disaster, provided these firms get funding to meet their temporary liquidity needs. The project will have two subcomponents: one on reimbursable financing for eligible MSMEs, and the other one for project management and implementation by KOSGEB. The project will offer liquidity support in the form of reimbursable financing as an extraordinary and temporary relief measure to MSMEs that are deemed financially viable before being hit by the earthquake. Given the huge needs of MSMEs during this crisis time, financial assistance provided by other development partners would become critical.

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The reimbursable financing will be support financing provided by KOSGEB to eligible MSMEs to cover their operating expenses. It will be disbursed on a "first come, first serve" basis, and the call for proposal will be open for 1 year or when the funds will be fully disbursed, whichever comes first. This will ensure those firms which might not be ready for immediate reopening can benefit, provided they reopen at a later stage when things are more normal. To support more vulnerable groups, 15 percent of total reimbursable financing funds will be earmarked for women owned MSMEs. The MSMEs will repay this financing after a grace period of up to two years, in three instalments over 12 months. The financing will be performance-based as MSMEs will commit to resume operations. In return for the support, beneficiary MSMEs will commit to reopen and continue their business operations, otherwise, they will be asked to begin to pay back the reimbursable financing. There will be no interest on the repayment amount, only the principal will be repaid.

The reimbursable financing will be made directly from KOSGEB's designated project account to the bank accounts of the beneficiary MSMEs. KOSGEB will open a designated account at an acceptable commercial bank. When MSMEs apply for reimbursable financing, they will undertake a commitment, in each case, through a Reimbursable Financing Agreement, on the terms and conditions acceptable to the Bank, for receipt for the financing, and for the repayment on reasonable terms acceptable to the Bank.

D. Environmental and Social Overview

D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

On February 6, 2023, two very large earthquakes of magnitude (Mw) 7.8 and 7.5 occurred nine hours apart on different fault lines in the southern region of Türkiye and northern Syria. The earthquakes have resulted in widespread damage across 11 provinces, where around 14.01 million (16.5 percent) of Türkiye's population live, including Adana, Adıyaman, Diyarbakır, Elazığ, Gaziantep, Hatay, Kahramanmaraş, Kilis, Malatya, Osmaniye and Şanlıurfa. As of March 20, 2023, the Disaster and Emergency Management Presidency (AFAD) reported that 50,096 fatalities have been reported and 107,204 people injured. The provinces affected by the earthquake had a share of 9.8 percent of the Gross Domestic Product (GDP) and generated approximately US\$79 million of national income in 2021.

There are 473,354 private enterprises registered in the earthquake affected areas, most of them are micro enterprises (95 percent). Most of these enterprises are concentrated in Adana (18.7 percent), Gaziantep (17.7 percent), Hatay (13.9 percent), Şanlıurfa (12 percent), Diyarbakır (8.5 percent), and Kahramanmaraş (8.3 percent). Most of the production activities in the region are carried out in the service, industry, and agriculture sectors. There are 15 thousand industrial firms in the 11 affected provinces, 20 percent are in organized industrial zones, which contributed 11.6% to total industrial output, and employed 465 thousand workers (11.1% of total industrial employment) in 2021.

According to the Small and Medium Enterprise Development Organization (KOSGEB), about 110 thousand MSMEs were slightly to severely damaged in the 11 provinces, which is 23.3% of the total number of MSMEs in the provinces (472,753 MSMEs). SMEs play an important role in the Turkish economy. By the end of 2020, there were 3.2 million SMEs registered, which accounted for 99.8 percent of all enterprises in Türkiye. They make very important contributions to the economy, providing 73.8 percent (US\$11.5 million) of the total jobs, 64.5 percent (TRY5.8 trillion) of the total enterprise turnovers, and 56.3 percent (US\$101.8 billion) of the total exports of Türkiye.

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Gender: Access to long-term finance via diversified sources is more challenging for SMEs and, within that group, women-led or managed firms given that financial institutions perceive them as higher risk. In Türkiye, 58 percent of loans require collateral when the business is managed by a woman, versus 38 percent when a business is managed by a man. Although the situation has recently improved — 69 percent of adults now have an account in Turkey, up from 57 percent in 2014 — only 54 percent of women have an account, compared with 83 percent of men. This 29 percent gender gap is roughly three times as large as the average gender gap in emerging economies. Women's participation in the economy is still very limited. The gap between women and men's overall labor force participation remains large: 38.2 percent for women (the lowest in the OECD and ECA) and 78.4 percent for men in 2019. The World Economic Forum's 2021 Gender Gap Index ranks Türkiye 133 out of 156 countries for gender equality across socioeconomic dimensions. Female employers represented only 1.25 percent of all employers in Türkiye in 2019. The project will address existing gender gaps in the affected region by introducing targets for female-owned or managed SMEs to become beneficiaries under components 1.

D. 2. Borrower's Institutional Capacity

KOSGEB is an affiliated organization of the MoIT with the objectives of increasing SMEs effectiveness and competitiveness, and ensuring industrial integration in conformity with economic development, to contribute to the social and economic needs of Turkiye. Its support is organized along four pillars: i) entrepreneurship support; ii) R&D and innovation support; iii) business development; and iv) finance and incubation, with offices in all 81 provinces of the country. KOSGEB has prior experience with the Bank financed projects, including under the ESF.

Under the Turkiye Rapid Support for Micro and Small Enterprises During The COVID-19 Crisis (P174144), KOSGEB established a PIU and has hired a competent E&S specialist and the E&S performance has been rated Satisfactory since the beginning of the project. Under the said project, KOSGEB has established an Environmental and Social Management System (ESMS), acceptable to the Bank, to screen, categorize and monitor E&S risks and impacts.

For the implementation of Türkiye Green Industry Project (P179255) which has been negotiated and expected to be approved by the Board soon, the negotiated ESCP requires KOSGEB to establish a PIU and hire one environmental, one social and one occupational health and safety specialist. KOSGEB has updated its ESMS for Green Industry Project which will also be used for this emergency project. The updated ESMS has been reviewed by the Bank team and being revised by KOSGEB to ensure that it can adequately cover all WB financed projects - which is mainly to strengthen their E&S assessment templates to cover any associated risks. Thus, KOSGEB will have sufficient institutional capacity and a good ESMS to screen, categorize and monitor E&S risks and impacts. The ESCPs will require KOSGEB to appoint or hire competent environmental, social and occupational health and safety specialists to implement and monitor the E&S requirements of the beneficiary firms.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Moderate

The environmental risk rating is classified as Moderate. The main objective is to provide financial support in the form of performance-based reimbursable loans to eligible MSMEs in the Turkiye from the earthquake affected areas to prevent their closures. Under Component 1, the reimbursable financing is expected to be utilized for eligible

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operating expenses, such as employee salaries, supplies (including services), rent, and utilities. The specific eligible reimbursable financing amounts are different based on the firm size and the level of negative impacts. The proposed loan amount limit for MSMEs under project range from USD2,500 for micro firms to up to a maximum of USD15,500 for the larger, medium firms. The project will be implemented by KOSGEB, performing the role of financial intermediary. The main environmental risks of the project are related to occupational health and safety (OHS), transportation, water use, energy use, limited air and noise emissions and waste management resulting from the ongoing activities, equipment supply and limited construction and repair/maintenance activities by the beneficiaries. These are expected to be site specific, temporary and can be readily addressed through standard mitigation measures and compliance with national environmental and social laws, the World Bank Environmental and Social Framework (ESF) and general Environmental, Health and Safety Guidelines (EHSGs). The overall supported portfolio risk is thus considered moderate. Any beneficiaries' activities rated as high and substantial environmental and social risk will not be eligible for financing. KOSGEB will be required to further enhance their existing, Bank approved ESMS to manage the E&S risks and impacts of its financing activities. As part of KOSGEB ESMS implementation, KOSGEB will conduct E&S screening and due diligence of eligible MSMEs for the reimbursable loan finance. The Project will also exclude any sub-projects with impacts on cultural heritage and biodiversity from being financed. The ESMS will require the compliance with the national environmental and social laws of Turkiye, applicable ESF ESSs, and respective WBG EHS Guidelines. The World Bank will maintain close oversight particularly in the early stages of implementation. In summary, Project activities are not expected to have large-scale, significant, and/or irreversible environmental and social impacts.

Social Risk Rating Moderate

The social risk is assessed as "Moderate". Overall, the project will have positive social impact by helping firms stay afloat, resume operation after earthquake and preserving the jobs of workers amidst economic crisis caused by the earthquake. The Component 1 of the Project is performance-based reimbursable financing to eligible MSMEs in the earthquake affected areas to prevent their closures. The reimbursable financing is expected to be utilized for eligible operating expenses, such as employee salaries, supplies (including services), rent, and utilities. Loan activities requiring land acquisition and involuntary resettlement, and those with impacts on cultural heritage will not be financed under the project. The main social risks are associated with labor and working conditions, E&S implementation capacity of KOSGEB, risk of inclusion of eligible firms as beneficiaries, difficulties in engaging stakeholders on a regular basis and, ensuring that women owned MSMEs are included in accessing the project benefits. Risks of labor influx are not expected since the project will only finance the operating cost of existing firms and the loan supported activities will not involve any major civil works. Community health and safety risks and impacts are anticipated to be low. Child and forced labor risks are not expected as the project will finance only formal enterprises.

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 Project will support MSMEs to keep their businesses afloat, resume operation and maintain the employment of their workers during the current acute phase of the crisis following the earthquake(s). This support is basically open

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for all sectors, and more specifically: Manufacturing; Electricity; water supply; sewerage; waste management and remediation activities; construction; wholesale and retail trade; transportation; and other services activities. Eligibility will be restricted to formally registered private manufacturing MSMEs who are not engaged in the business activities of the WBG Exclusion List and who are compliant with national environmental, social and labor and OHS laws. The reimbursable finance under component 1 is expected to be utilized for eligible operating expenses, such as employee salaries, supplies (including services), rent, and utilities.

The main environmental and social risks and impacts of the Project is the ability of KOSGEB, the FI, to implement a satisfactory Environmental and Social Management Systems to manage the E&S risks of the credit approval process of the supported MSME portfolio. The potential E&S risks and impacts of Project beneficiary MSMEs are labor and working conditions, (OHS), transportation, water use, energy use, limited air and noise emissions and waste management resulting from the ongoing activities, equipment supply and limited construction and repair/maintenance/refurbishment activities by the beneficiaries, difficulties in engaging with stakeholders and ensuring the inclusion of women-owned enterprises as beneficiaries. These impacts are expected to be site-specific, temporary and can be readily addressed through standard mitigation measures in the KOSGEB Bank-approved ESMS to ensure compliance with the Exclusion List, national laws, the World Bank ESF and ESHGs. Beneficiary MSME firms whose business activities are of substantial and/or high environmental and social risks, requiring land acquisition and involuntary resettlement, and those with impacts on environmentally sensitive areas (for example, nationally and internationally protected areas) and cultural heritage, and activities involving child and forced labor will not be eligible for support under this Project. Limited civil works are expected under the project for minor repairs, refurbishment, and maintenance activities. Residual labor risks will be addressed through adherence to the ESMS that the KOSGEB has developed. Risks of labor influx are not expected, and community health and safety risks and impacts are estimated as low. Child and forced labor risks are not expected as the project will finance formal enterprises, who are paying social insurance contribution of the Social Security Agency. Legal agreements between KOSGEB and sub-project firms will include requirement for compliance with national environmental and social laws, including labor, OHS, laws prohibiting SEA/SH, and laws protecting vulnerable categories of workers.

KOSGEB has prepared an SEP to guide continuous engagement with potential beneficiary firms and other interested parties such as business associations, and national authorities. SEP include detailed grievance mechanisms for loan beneficiaries.

KOSGEB has an ESMS from the previous project which will need to be enhanced and deemed satisfactory to the Bank, to manage the more complex E&S risk of this Project. KOSGEB will ensure that that the enhanced Bank approved ESMS is implemented and maintained through the lifecycle of the Project. Further details on the KOSGEB ESMS are discussed under ESS9 section. Prior to loan approval, all beneficiary firms will be assessed for E&S risks and impacts in accordance with the KOSGEB's ESMS approved by the World Bank. As part of the loan approval procedure, E&S due diligence will be conducted by KOSGEB.

Vulnerable direct beneficiaries may include women-headed enterprises, young firms (those with less than 5 years in operation), and firms employing refugees. The project will include specific gender targets to ensure female-headed MSEs and young firms are included in the project.

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ESS10 Stakeholder Engagement and Information Disclosure

KOSGEB has prepared a draft SEP for the project with consultation activities at key ministerial, business associations and firm stakeholder level which has been disclosed on KOSGEB webpage.

The SEP covers the whole project. It identifies and analyzes key stakeholders (i.e. affected parties, other interested parties and disadvantaged and vulnerable groups) and describe the process and modalities for sharing information on the project activities, incorporating stakeholder feedback into the Project and reporting and disclosure of project documents.

Project preparation has included a detailed mapping of the stakeholders. Direct beneficiaries have been identified as eligible MSEs, and their employees. During project implementation KOSGEB will consider if there are any firms which may be potentially facing a risk of exclusion from project benefits due to language barriers. In such instances, KOSGEB will provide differentiated measures to meaningfully engage such enterprises including provision of translated information about the project (e.g. in Arabic).

KOSGEB already has in place established grievance mechanism (GM) to receive concerns, complaints, suggestions and feedback from grant/loan beneficiaries of other projects as well as those who believe may be adversely affected by the activities of KOSGEB and grant/loan beneficiaries of other projects. Detailed GM procedures adapted for this project has been presented in SEP including departments responsible to receive and address grievances, different means of receiving grievances (e-email, webpage, phone number, mail) and stipulated time frames to address and respond to grievances. KOSGEB also has an active Call Center (444 1 567) and a Help Desk (https://www.kosgeb.gov.tr/site/tr/genel/iletisimmerkezi) that is accessible for all stakeholders to lodge a grievance. In addition, national level GRM - the Presidency Communication Center (CIMER) is accessible and to any Turkish citizen and is functioning. KOSGEB also receives and records in its system grievances which are received thought CIMER. KOSGEB has established database to log complaints. The SEP includes strategies to report back to stakeholders during project implementation.

The SEP will be updated within 30 days from the project Effectiveness Date, to include feedback received during consultations and refined consultation strategies and modalities with due consideration of measures in place at such time. The final SEP will be disclosed and shared with relevant stakeholders via culturally appropriate means.

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

Direct workers are KOSGEB employees, who are civil servants. They will remain subject to the terms and conditions of their existing public sector employment agreement. The provisions of ESS2 paragraphs 17 to 20 (Protecting the Workforce) and paragraphs 24 to 30 (OHS) will apply to civil servants working in connection with the project. In ESCP, KOSGEB will commit that any consultants directly hired by KOSGEB to carry out the activities related to the project, will be employed under the terms and conditions as required by the national labor law and ESS2. The project will not engage community and primary supply workers as per ESS2 definition.

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Assessment of already available labor management procedures as part of current and ongoing WB Projects (as mentioned above) has been concluded: KOSGEB provided documented evidence of its labor management procedures. The human resource policies define employees' rights such as compensation and wages, working hours, overtime hours and payment, leaves (maternity, annual, sick, unpaid), recruitment, training, promotions, severance payment, disciplinary measures, non-discrimination and equal opportunity. The policies prohibit forced labor and the minimum working age at KOSGEB is 18 years. Human resources procedures prohibit harassment including sexual harassment and provide for mechanisms to report such cases. Human resources policies are accessible to employees on intranet webpages sites.

Occupational health and safety: KOSGEB facilities are equipped with fire safety instruments as required by local regulation and has emergency action plans in place. The staff receives routine training on fire safety and first aid. Regular drills are conducted and reported. KOSGEB has incident reporting procedures and as per national OHS Law notify the Ministry of Labor within 3 business days about OHS related incidents. For workers of beneficiary firms, the adequacy of managing OHS risks will be managed through implementation of the ESMS which is being updated and be reviewed by Bank.

Grievance mechanism (GM): An internal GM for KOSGEB employees is available. The employees have the right to file complaints on any administrative actions and procedures applying to them, which can be submitted to KOSGEB Human Resources Department. Complaints are assessed and necessary measures are taken under KOSGEB Human Resources Regulation and Disciplinary Regulation.

The current Turkish Labor Law (No.4857) is to large extent consistent with ESS2 requirements. 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. Forced labor is prohibited by the Turkish Constitution.

In line with ESS9, KOSGEB, through its ESMS, will apply relevant requirements of ESS2 to sub-projects - MSEs recipients of project loans. Exclusion List will include prohibition of financing of activities involving forced and child labor and screening and monitoring of sub-projects will include compliance with national labor and OHS laws. Legal agreements between KOSGEB and loan recipient firms will include requirements for compliance with national labor and OHS laws. Labor and working conditions risks and impacts will be identified, assessed and addressed within the scope of the KOSGEB's ESMS in accordance with relevant ESS2 requirements. KOSGEB and PBGs sub-borrowers will be required to follow the national Ministry of Health and WHO guidance to minimize the risk of COVID-19 transmission in the workplaces.

Grievance mechanisms established by KOSGEB will provide an avenue for employees of sub-projects firms to report any non-compliance with project procedures including labor issues.

ESS3 Resource Efficiency and Pollution Prevention and Management

The project implementation will include provision of reimbursable loans by KOSGEB, performing the role of financial intermediation, to MSME firms in the earthquake affected region. Potential beneficiary MSMEs' business activities risks related to limited air and noise emissions, water releases, water use, energy efficiency and waste management

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will be mitigated through implementation of the KOSGEB's ESMS. The ESMS which is fully discussed under ESS 9, will include all the necessary processes and procedures to ensure site specific considerations related to resource efficiency, pollution prevention and management at beneficiary MSMEs are addressed and managed. Environmental risks of beneficiary MSMEs which might cause significant pollution impacts, will be rated as High or Substantial, and thus, will be considered ineligible for financing.

ESS4 Community Health and Safety

Business activities of beneficiary MSMEs may cause limited community health and safety impacts. These impacts will be identified, assessed and addressed within the scope of the KOSGEB's ESMS in accordance with ESS4 requirements. Beneficiary MSME business activities with significant impacts on community, health and safety rated as High or Substantial risk will be considered ineligible for financing.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

This standard is not relevant because the project will exclude any investments which may require land acquisition and involuntary resettlement.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This standard is not relevant because beneficiary MSME business activities which might adversely impact biodiversity conservation and sustainable management of living natural resources will not be eligible for financing within the scope of the project.

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

The standard is not relevant, since there are no Indigenous Peoples in Türkiye which fit the definition of ESS7.

ESS8 Cultural Heritage

This standard is not relevant because beneficiary firms business activities having impacts on cultural heritage will not be eligible for financing within the scope of the project.

ESS9 Financial Intermediaries

KOSGEB will act in the capacity of a financial intermediary and will be required to implement an ESMS with adequate capacity satisfactory to the World Bank to manage the E&S risks of its financing activities. KOSGEB has an ESMS for the previous micro enterprises grant finance project. KOSGEB will be required to further enhance this ESMS to suit SME loan asset class and the associated E&S risk and impacts for SME business operations. The enhanced ESMS which will include adequate policies, procedures and capacity to manage SME loan activities will be further reviewed by the World Bank to ensure it is satisfactory to meet World Bank ESS 9 requirements for financial intermediaries.

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The newly developed ESMS for the Project will be commensurate with the risk of its loan activities and maintain adequate capacity for the environmental and social risk management of the Project. The ESCPs include a requirement to finalize the implementation of the Bank approved ESMS no later than 30 days after the Effective Date of the Project and to maintain it through the life cycle of the Project. KOSGEB will ensure the ESMS including all the elements defined under ESS9 is reviewed, enhanced if necessary and maintained, to ensure that the necessary capacity, commitment and governance is in place to adequately manage the E&S risks of the reimbursable loan activities. The KOSGEB ESMS to be implemented for the Project will include (i) an environmental and social policy; (ii) clearly defined procedures for the identification, classification, assessment and management of the environmental and social risks and impacts of beneficiary MSMEs; (iii) defined organizational capacity and competency; (iv) monitoring and review of environmental and social risks throughout the life cycle of the project; and (v) external communications and grievance mechanism. The ESMS will also allow for screening loan beneficiary firms' business activities against the World Bank Exclusion lists and compliance with national laws of Türkiye. Where E&S gaps are identified from the KOSGEB E&S due diligence processes on beneficiary firms, corrective action plans (CAPs) will be developed by KOSGEB as a condition of financing to the MSMEs. KOSGEB will be required to monitor the implementation of CAPs through facility agreements with respective MSMEs and ensure compliance with World Bank E&S requirements for the Project.

KOSGEB ESMS, satisfactory to the Bank, will be in place before the Effectiveness Date of the Project. KOSGEB will be required to monitor and supervise the environmental and social performance of the reimbursable loan finance portfolio exposures. KOSGEB will report to the Bank semi-annually on the performance of the beneficiary firms. The content of semi-annual reports will be detailed in the Project Operational Manual. The Bank will conduct prior review for an initial set of sub-projects of KOSGEB and thereafter conduct supervision spot checks for a number of sub-projects. The details of prior and post review will be described in the Project Operational Manual.

KOSGEB will adapt the already established grievance mechanism for other Project to enable beneficiaries as well as those who believe they are adversely impacted by the beneficiaries' activities to submit complaints, feedback, inquiries, and suggestions such as violation of project policies, guidelines, or procedures, including those related to child labor, health and safety of workers, workplace harassment. The GM will also allow submission of anonymous grievances. The details of the GM are explained in the SEP and will also be presented in the Project's Operational Manual.

B.3 Other Relevant Project Risks

NA

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

No

OP 7.60 Projects in Disputed Areas

No

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B.3. Reliance on Borrower's policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework?

No

Areas where "Use of Borrower Framework" is being considered:

The Use of Borrower Framework is not being considered.

IV. CONTACT POINTS

World Bank

Contact: Stefka Slavova Title: Lead Economist

Telephone No: +1-202-473-0037 Email: sslavova@worldbank.org

Contact: Ali H. Abukumail Title: Senior Private Sector Specialist

Telephone No: 5242+8346 / 90-312-4598346 Email: aabukumail@worldbank.org

Borrower/Client/Recipient

Implementing Agency(ies)

V. FOR MORE INFORMATION CONTACT

The World Bank 1818 H Street, NW Washington, D.C. 20433 Telephone: (202) 473-1000

Web: http://www.worldbank.org/projects

VI. APPROVAL

Task Team Leader(s): Stefka Slavova, Ali H. Abukumail

Practice Manager (ENR/Social) Gaurav Dilipkumar Joshi Cleared on 10-May-2023 at 10:37:49 EDT

Safeguards Advisor ESSA Abdoulaye Gadiere (SAESSA) Concurred on 10-May-2023 at 17:53:21 EDT

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