



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)
Türkiye	EUROPE AND CENTRAL ASIA	P180173	
Project Name	Türkiye Socially Inclusive Green Transition Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social Sustainability and Inclusion	Investment Project Financing	6/13/2023	11/30/2023
Borrower(s)	Implementing Agency(ies)		
Republic of Türkiye	Ministry of Industry and Technology (MoIT)		

Proposed Development Objective

The Project Development Objective (PDO) is to contribute to the green transition in Türkiye by supporting regional and local authorities in improving green livelihood opportunities for vulnerable groups and communities.

Financing (in USD Million)	Amount
Total Project Cost	400.00

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]

The proposed project aligns with the 2022 Türkiye Country Climate and Development Report CCDR that recognizes the risk of negative social impacts of the Green Transition. The project will support community resilience in the context of the green transition, and will support the inclusion of vulnerable groups in green labor markets, through: (i) sub-grants to support local development stakeholders for the creation and development of green jobs, (ii) provision of upskilling and reskilling programs for vulnerable workers in most affected sectors, as well as (iii) the financing of green livelihood-related infrastructures at the local level, to support green employment opportunities.



The proposed Socially Inclusive Green Transition Project (SoGreen Project) is aligned with the World Bank Country Partnership Framework (CPF) covering the period 2018-2023, and with Türkiye’s 11th Development Plan. In particular, it supports the achievement of Focus Areas I (Growth) and II (Inclusion) through the following objectives: (i) Objective 2: Enhanced Access to Finance for Underserved Markets; and (ii) Objective 5: Increased Labor Force Participation of Women and Vulnerable Groups.

D. Environmental and Social Overview

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

The proposed SoGreen project aims at addressing the social impacts of the green transition, through two complementary approaches: (i) mitigating the negative social impacts of the transition for those who are at risk of becoming “losers” in the process and could lose their livelihoods; and (ii) maximizing the potential positive impacts of the transition by supporting those who are already excluded from access to livelihoods, but whom could benefit from new opportunities brought by the green transition. The project is national in scope and project-supported activities will take place in all 26 regions, and in selected provinces.

Environmental Management: Turkey’s legal frameworks for the management of air quality, waste, wastewater, noise, etc. are well advanced in aligning with EU environmental acquis. The national environmental legislation has been developing and there are no major gaps with the WB ESF requirements. The new regulation on Environmental Impact Assessment was published on July 29, 2022, which requires the preparation of Cumulative Impact Assessments, Environmental and Social Action Plans, Greenhouse Gas Reduction Plans, Stakeholder Engagement Plans etc. These will include risks and impacts associated with community health and safety, occupational health and safety, cultural heritage, biodiversity and means to minimize/mitigate those impacts during pre-construction, construction and operational phases of the projects.

Climate change: The 2022 Türkiye Country Climate and Development Report (CCDR) considers that Türkiye can achieve 2053 net zero target emissions with major investments, and changes in many economic sectors, including the power sector, industries, agriculture, and water management. The transition towards a green economy may negatively affect groups that, if not well prepared or equipped, are set to lose their livelihoods in the process. Many of these groups, including low-skilled men in brown sectors, women and youth, already face significant vulnerability, and other groups could likely become vulnerable as a result of the green transition, such as low-skilled workers. The green transition is also a process that could allow vulnerable groups to take advantage of the new opportunities generated, if provided with timely support, guidance, and adequate skills.

Gender: Women-led or managed firms face more barriers in access to finance. 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.

Disadvantaged groups: Less than half of young people in Türkiye (45 percent) participate in the labor market. Youth have higher rates of unemployment than the rest of the population (22.6 percent in 2021). Persons with disabilities (who comprise more than six percent of the population) are less than half as likely to work (21 percent vs. 48 percent) and are over five times as likely to be illiterate (23 percent vs. 4.5 percent) than the general population. Spatial inequalities are also strong, with the eastern regions of the country historically lagging the western regions in income, educational attainment, and consumption. Although poverty has declined across the country, poverty reduction has been slower in less developed regions than elsewhere.

D. 2. Borrower's Institutional Capacity

The Ministry of Industry and Technology (MoIT) Directorate General of Development Agencies will be the main implementing and the main coordinating agency. The project Implementation will be anchored within the MoIT, where a PIU will be established to support the proposed SoGreen Project. Project activities under Components 1 and 2 will be implemented with the support of the regional Development Agencies (DAs). DAs have also been involved in the Bank financed Social Entrepreneurship, Empowerment and Cohesion in Refugee and Host Communities in Türkiye Project (SEECO) (P171456).

The MoIT is currently implementing two Bank-financed projects under the Environmental and Social Framework (ESF), namely Türkiye Organized Industrial Zones Project (P171645) and Social Entrepreneurship, Empowerment and Cohesion in Refugee and Host Communities in Türkiye Project (P171456). Both projects established the Project Implementation Unit (PIUs), staffed with dedicated environmental and social specialists. The environmental and social (E&S) performance ratings of the two projects are Satisfactory/Moderately Satisfactory. The existing PIU staff at MoIT also received Bank provided trainings on ESF and GBV prevention.

The MoIT will establish a PIU which will include dedicated social, environmental and OHS staff to implement and monitor the ESF requirements for the proposed SoGreen project. These requirements will be included in the ESCP. Component 2 will also provide an institutional capacity strengthening program to support local authorities as well as targeted national-level authorities in selected sectors to improve capacities in designing, planning and implementing socially inclusive green development initiatives. This component is aligned with the CCDR's recommendation to invest in capacity building and institutional strengthening. There will be funds available for institutional capacity-strengthening and project management for MoIT and regional DAs under Component 3.

The DAs provide financial and technical assistance to development projects that are expected to contribute to the realization of the priorities and objectives identified in the regional development plans. The DAs focus on various thematic areas under social and economic development, small-scale infrastructure, investment promotion and cooperation for development in the regions. Most DAs specialize in and focus on specific issues according to the potential in their regions. Entrepreneurship, low carbon economy, renewable energy, social inclusion and cohesion, agriculture and rural development are among the most commonly supported areas. The DAs can provide support to various entities including public institutions, private sector, and non-governmental organizations such as associations, foundations and producer unions.

DAs will need to have the required E&S capacity and dedicated E&S specialists to be able to implement the ESF within the scope of the project. The DAs that are involved in the SEECO project has gained experience in Bank-financed projects and dedicated capacity-building activities are being provided to their staff including training on the Bank's ESF and GBV prevention. All 26 DAs are expected to be involved in the SoGreen project. Some of those DAs will not



have previous experience with World Bank projects. Therefore there will be a need for capacity-building activities for the new DAs who are not familiar with WB projects. The ESCP will include a requirement for DAs to have dedicated E&S specialists throughout the project implementation.

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 is assessed as Substantial. The project has a national-wide scope (all 26 regions) and the exact locations of the sub-projects will not be known during the project preparation and appraisal stages. This risk will be re-evaluated when additional information becomes available, particularly those related to the scale, size and location. In general, the environmental impacts from the project are expected to be positive given that the green transition and infrastructure investments will be supported under the project. However, during the construction of new facilities, renovations of the existing facilities, equipment installation and etc., the implementation activities might entail a series of adverse risks and impacts and specifically: dust and noise generation, vehicle and machines emissions, generation of construction waste, hazardous material and waste including oil, grease, hydrocarbons, old electrical appliances, lead-based paints, etc. as well as OHS issues such working at height, rotating and moving equipment, vibration, welding / hot works, industrial vehicle driving and site traffic, ergonomics, repetitive motion, manual handling, fire, etc. While the construction activities might have some adverse impacts on natural habitats and cultural heritage, all such investments will be excluded from financing, based on the initial environmental screening. The impacts related to the project activities under Component 1 are expected to be temporary, reversible and manageable through the application of the national laws as well as the use of the World Bank Environmental, Health and Safety Guidelines (EHSs) and Good International Industrial Practices (GIIP). However, the potential activities to be supported under Component 2 might require substantial investment and time to manage environmental risk and impacts of the construction of new facilities while medium to low probability of serious adverse effects to human health and/or the environment (e.g. due to accidents, hazardous waste management, OHS, etc.). Therefore, the proposed environmental risk rating for the project is Substantial at concept stage.

Social Risk Rating

Moderate

The social risk rating is Moderate. The project is expected to have positive social impacts on vulnerable groups as its main target groups are women, youth, lower-skilled workers, unemployed persons, and those employed in brown industries. Social inclusion aspects are at the core of the project design, and other vulnerable groups such as refugees and persons with disabilities will also be able to benefit from project support under Component 1. The project is not expected to cause direct irreversible or unmanageable impacts, as the project will exclude from sub-grant financing any activities assessed as High risk, and any causing impacts on cultural heritage. The project is expected to support both new investments/construction of new facilities and rehabilitation of existing facilities; therefore civil works will be eligible under the project. Community health and safety, and labor and occupational health and safety impacts during civil works are expected to be manageable and will be addressed by adhering to the standard mitigation measures included in the Environmental and Social Management Framework, including the application of the national laws, use of the World Bank EHS, Code of Conduct for construction workers and stakeholder engagement activities. While the project aims to avoid land acquisition impacts, these risks and impacts cannot be completely ruled out.



While the MoIT will not conduct any new land acquisition for the subprojects, there may be instances under Component 2 where municipalities acquired the land for proposed sub-projects prior to the Bank financing. Therefore, a Resettlement Framework will be prepared to manage such cases of land acquisition prior to Bank financing as well as any potential cases of land acquisition needed for associated facilities. Risks of child and forced labor are not expected, and the project labor management procedures (LMP) will include a clear minimum working age and procedures for age verification. To facilitate social inclusion and participation of stakeholders, the project will prepare a Stakeholder Engagement Plan (SEP), and stakeholder engagement activities will start early during project preparation. Sexual exploitation and abuse/sexual harassment (SEA/SH) risk is assessed as moderate and discussed in a dedicated section. MoIT and regional development agencies already have experience with Bank-financed projects and the ESF. The existing PIUs have already received in-depth trainings on ESF.

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 objective is to improve local-level green livelihood opportunities for target vulnerable groups. The project is expected to have overall positive social impacts and target beneficiaries will include women, youth, lower-skilled workers, unemployed persons, and those employed in brown industries. For Component 1, at least 50 percent of individual beneficiaries of individual support (training) will be women. Social inclusion issues are at the core of the project design, and the local communities and vulnerable groups will participate in the decision-making process about sub-projects. The environmental impacts from the project are expected to be positive given that the project will support the green transition. The project will exclude from financing any sub-projects rated High for environmental and social (ES) risks and impacts, and those with impacts on biodiversity and cultural heritage. While MoIT will exclude any new land acquisition from project support, there may be cases of prior land acquisition carried out by local authorities for proposed sub-project investments, prior to Bank financing. Physical displacement is not expected within the scope of the project. The project activities will include construction of new facilities, rehabilitation of existing facilities and installation of equipment. The project has a national-wide scope (all 26 regions and some selected provinces) and the exact locations of the sub-projects will not be known during the project preparation and appraisal stages.

Under Component 1: Supporting Inclusive Access to Green Livelihood Opportunities, the project will support access to green livelihood opportunities for vulnerable groups, by supporting local development stakeholders with creating greener and more sustainable livelihoods and supporting local and green training programs to ensure target vulnerable groups are able to acquire skills relevant to the green economy.

Sub-component 1(a) will support subgrants to local development stakeholders (including producer unions, associations, cooperatives, and enterprises) that focus on having positive social and environmental impacts on their communities. The subgrants will aim to support creating green(er), and (more) sustainable jobs. Key activities to be supported by the subgrants would include, for example: enhancement of dissemination of solar power systems in electricity generation in order to reduce energy costs in agricultural irrigation (i.e. installation of solar power units; modernization and rehabilitation of existing irrigation infrastructure, systems etc.). Sub-component 1(b): Supporting



local skills for the green transition will support re-skilling and up-skilling programs to support access to new livelihood opportunities and ensure that workers whose sectors are affected by the green transition and losing employment or at risk of losing employment can access new opportunities, and that women and youth are equipped with the relevant skills to access new opportunities throughout the country. The local training centers will provide re-skilling trainings. This sub-component will also finance small rehabilitation works and equipment for the training centers.

The ES risks and impacts associated with Component 1 are not likely to be significant and are expected to be reversible, temporary, low in magnitude, and site-specific. ES risks and impacts include noise, generation of dust and waste, use of energy, OHS and community health and safety issues which are all manageable with standard mitigation measures. Labor influx and land acquisition risks and impacts are not expected within the scope of this sub-component.

Under Component 2, Community Infrastructure Investments for Green and Inclusive Livelihoods the project will support green infrastructures that will support green employment and local development. Local communities will be engaged in the planning and prioritization processes of these infrastructures. ES risks and impacts are expected to be in the range of Moderate to Substantial. Moderate risk subprojects may include 'green' renovations or additions to existing facilities, such as installing solar panels to increase energy efficiency in an existing production facility; building a recycling center as an extension to an existing factory; or installing a waste management system to process waste from an existing industrial facility. Substantial risk subprojects may include the new construction of 'green' facilities, such as medium-scale green facilities, waste management facilities, geothermal greenhouses, or facilities for the production of renewable energy equipment. The typology of eligible sub-projects and definitions of green investments is currently under discussion and will be agreed upon by project appraisal. The ES risks and impacts associated with Component 2 include dust and noise generation, vehicle and machines emissions, generation of construction waste, hazardous material and waste including oil, grease, hydrocarbons, old electrical appliances, lead-based paints, etc. as well as OHS issues such working at height, rotating and moving equipment, vibration, welding / hot works, industrial vehicle driving and site traffic, ergonomics, repetitive motion, manual handling, fire; limited labor influx and potential prior land acquisition issues. While the construction activities might have some adverse impacts on natural habitats and cultural heritage, all such investments will be excluded from financing, based on the initial environmental screening. Overall SEA/SH risks are assessed as moderate.

To manage ES risks and impacts, the MoIT shall prepare an Environmental and Social Management Framework (ESMF), Labor Management Procedures (LMP), Stakeholder Engagement Plan (SEP) and Resettlement Framework (RF), which will be disclosed in Turkish and English before project appraisal and discussed and consulted with stakeholders.

The ESMF will outline ES exclusion criteria in line with the project design, screening procedure for ES risks and impacts, procedures for ES risks and impacts management, and mitigation measures for waste management, noise, dust, energy use, labor, OHS and community health and safety, and present instruments that can be applied to avoid or mitigate potential ES adverse impacts and risks of the project activities. The ESMF will include requirements for compliance with applicable national laws, World Bank EHS, and GIIP. The ESMF will propose the form of Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMP) or ESMP checklists that will be prepared on a site-specific basis for assessment and management of the ES risks and impacts of the investments to be financed by the project. The potential risks described in the ESMF will be further detailed in the site-specific ESIAs, ESMPs or checklists.



The details of the LMP, RF and SEP are described in the ESS2, ESS5 and ESS10 sections. In addition to the SEA/SH mitigation measures such as SEA/SH trainings and Code of Conduct for workers and a dedicated SEA/SH grievance mechanism, the project design will also include awareness raising on broader gender-based violence issues and prevention. The project will develop an extensive stakeholder engagement program with diverse local stakeholders, and will rely on a participatory approach and active consultation in the selection of sub-project activities.

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

The Use of Borrower Framework is not being considered.

ESS10 Stakeholder Engagement and Information Disclosure

MoIT will prepare a draft SEP for the project with consultation activities at key ministerial, government agencies, business associations, and local authorities, and local development stakeholder level. MoIT shall coordinate with development agencies and other stakeholders to include stakeholder engagement activities under Components 1 and 2 in the SEP.

The SEP will identify and analyze 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 design and implementation and reporting and disclosure of project documents. The SEP will also integrate proposed citizen engagement activities and indicators.

During project preparation, a detailed stakeholder mapping shall be carried out. At this stage, it is anticipated that the main stakeholders will be development agencies, municipalities in targeted regions, business associations, green oriented SMEs, organizations involved in developing green economy, and other organizations working on climate change issues, decarbonization and greening of firms. Additionally, vulnerable groups include women, youth, low-skilled workers, those employed in brown industries, unemployed, and refugees who may face more barriers to access green jobs or finance. The project will target women and youth-led firms in order to narrow the identified gap in access to finance and labor markets. It is anticipated that the strategies for information disclosure and consultations will include digital technologies, such as virtual meetings and focus groups, social media and MOIT's, and development agencies' webpages. However, it is also expected that in-person modalities of stakeholder engagement will increase during project preparation and implementation.

MoIT will prepare and disclose the draft SEP (in Turkish and English languages) before project appraisal and carry out stakeholder consultations on the project design and environmental and social aspects of the project.

MoIT will establish grievance mechanisms (GM) to manage and address ES concerns and grievances by stakeholders. The GM will also include channels for handling SEA/SH complaints sensitively and confidentially. MoIT has gained experience in establishing and managing grievance mechanisms under two existing Bank funded projects. The GM established for the SEECO project also defines roles and responsibilities for DAs at the regional level, and MoIT is providing GM trainings to DA staff regularly. MoIT has also gained experience in creating communication materials for information dissemination on GM, including posters, leaflets, announcements on the project website and social



media channels, etc. which were developed considering the needs of vulnerable groups. The new SoGreen project will benefit from these experiences gained in existing Bank-financed projects.

In addition, there is a national-level grievance mechanism - the Presidency Communication Center (CIMER), which is accessible to any Turkish citizen and is functioning well. MoIT is mandated to receive and record in its system grievances that are received through CIMER. In general, previous experience in the WB-funded projects indicates that citizens use this feedback mechanism to raise a wide range of concerns and government agencies and business entities address grievances received through CIMER.

Detailed project GM procedures will be presented in the SEP, including departments responsible for receiving and addressing grievances, different means of receiving grievances (e-mail, webpage, phone number, mail) and stipulated time frames to address and respond to grievances. The SEP shall include a budget and strategies to report back to stakeholders during project implementation. In addition, the ESCP will include any additional GM procedures which would need to be completed and implemented during project implementation. The SEP will be updated, as needed, during project implementation.

Under Component 3, the project will support large-scale public information campaigns to raise local stakeholders' awareness (public sector, private sector, civil society, and the wider public) on green transition-related opportunities and challenges.

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

This standard is relevant. The project will include direct and contracted workers. Community and primary supply chain workers are not anticipated to be engaged within the scope of this project. Direct workers in this project are (i) Employees of MoIT and technical consultants assigned/engaged to work within the PIU; and (ii) employees of development agencies, municipalities and technical consultants engaged to support the core activities of the project under Component 2. Contracted workers are employees of technical and consulting firms engaged to provide technical advice and capacity building under Components 1 and 2.

It is anticipated that employees of MoIT assigned to work within the PIU will be civil servants. The terms and conditions of the public sector employment will continue to apply to civil servants. Employees of development agencies and municipalities are also public sector employees and the terms and conditions of their public sector employment shall continue to apply. 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 the ESCP, MoIT will commit that any individual consultants directly hired to carry out the activities related to the project or to work in the PIU, will be employed under the terms and conditions as required by the national labor law and ESS2. These requirements will also be included in the LMP.

ESS2 requirements will apply to the direct and contracted workers. Working conditions and OHS requirements in line with ESS2 will also be integrated into the project LMP. The minimum working age in the project will be 18 years.



Occupational health and safety: MoIT facilities are equipped with fire safety instruments as required by local regulation and have emergency action plans in place. The staff receives routine training on fire safety and first aid. Regular drills are conducted and reported. MoIT has incident reporting procedures and, as per national OHS Law, they must notify the Ministry of Labor within 3 business days about OHS-related incidents. The ESCP will include a requirement that any incident/accident should be reported to the Bank no later than 48 hours after learning of the event.

Although a large-scale labor influx is not expected within the scope of this project, workers' accommodation may be needed during the construction of new green facilities. Any worker accommodation that will be established within the scope of the project will follow the WB guidelines on standards for worker accommodation.

The current Turkish Labor Law (No.4857) is to a 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 terms of OHS regulations, government agencies are subject to the national OHS law (Law No. 6331), and the Ministry of Labor and Social Security is responsible for its enforcement. The OHS Law governs workplace environments and industries (both public and private) as well as 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 Labor Inspectorate, which is an agency under the Ministry of Labor and Social Security oversee the enforcement of the law and conducts regular OHS and labor audits.

Grievance mechanism: MoIT has in place an internal GM for its employees. The employees have the right to file complaints on any administrative actions and procedures, which can be submitted to human resources departments. Complaints are assessed and necessary measures are taken under existing human resources regulation and disciplinary regulation. These regulations cover instances of harassment and sexual harassment. During project preparation, these existing grievance mechanism procedures will be assessed and any actions to improve them in line with ESS2 requirements will be included in the labor management procedures (LMP).

The MoIT will prepare the LMP before appraisal, which will outline responsibilities for managing labor and working conditions issues, policies and procedures to manage labor risks and OHS risks, minimum working age and the age verification procedure, contractor management and grievance mechanism for workers. The LMP will include a suggested Code of Conduct and a requirement to carry out SEA/SH sensitization and prevention trainings. MoIT will develop a SEA/SH GM, which will be able to receive anonymous and sensitive complaints and designed in a manner to avoid the fear of retaliation.

ESS3 Resource Efficiency and Pollution Prevention and Management

This standard is relevant. The project activities under Component 1 (such as enhancement of dissemination of solar power systems in agricultural irrigation) and Component 2 (such as construction of new waste recycling centers) may result in environmental pollution and inefficient use of resources (raw materials, water, and energy). This would require adequate assessment and management to ensure sustainable use of resources and minimize related adverse impacts on the environment (air, water, soil). The potential risks and impacts associated with subproject activities



during construction and operation phases may include noise, vibration, odor and dust, aerosol emissions, hazardous and non-hazardous waste, , greenhouse gas emissions, energy and water consumption, wastewater and sludge and contamination of surface and groundwater. Energy efficiency measures and renewable energy replacements will be considered during the design phase of the sub-project activities, as possible. In addition, regarding any high water demand project that can have potentially significant adverse impacts on communities, other users or the environment, all such subprojects site specific ESIA/ESMPs will include an water balance assessment of current and/or potential use after the project implementation, to estimate the amount of water that will be used along with the current water use situation in the area of impact. In this regard the ESMF document will provide guidance and criteria when and how to implement this requirement.

The ESMF will identify and assess all the potential risks and impacts associated with material use and waste generation of all subprojects and determine if additional management plans such Waste Management Plan or Traffic Management Plan. Furthermore, generic risk and impact management and mitigation measures will be laid out in the ESMF and further elaborated in detail in site-specific safeguards instruments, following applicable national regulations, ESS3 and the WB ESF's mitigation hierarchy, WBG EHS General and sector-specific (if applicable) guidelines, and Good International Industrial Practices (GIIP). In addition, opportunities for energy and resource efficiency will be sought throughout all project activities.

ESS4 Community Health and Safety

Community health and safety risks will be based on construction phase impacts of sub-projects, such as noise and air quality including gas and dust emissions, traffic management including temporary road closures and transport of wastes (including hazardous), hazardous chemical management, and construction waste management. Although a large-scale labor influx is not expected, workers' accommodation may be needed for the construction of new green facilities. It is not expected that workers' accommodation will not be needed for the operation of these facilities. Any worker accommodation that will be established within the scope of the project will follow the WB guidelines on standards for worker accommodation.

The ESMF and the SEP will identify potential sensitive receptors and the likely impacts of construction on community health and safety, as well as mitigation measures, monitoring and reporting requirements. Site-specific ESIA/ESMPs/ESMP Checklists will include measures addressing disturbance of the community members as well as the staff in the buildings in addition to traffic management measures/plans that will cover management of traffic safety risks, accident prevention, training programs, relevant stakeholder engagement activities and site safety awareness and access restrictions, depending on the level of risk. At this stage, security forces are not foreseen to be utilized within the Project but during preparation when environmental and social risks are better assessed in the ESMF, usage of security forces will be reassessed.

Depending on the location of the sub-projects, surrounding communities, settlements or businesses in addition to building users will need to be informed of any project-related activity or impact prior to implementation as will be defined in the sub-project specific E&S documents. The contractors will be required to appoint a focal person who will be responsible for the dissemination of project information and execution of stakeholder engagement activities.



Any risks related to SEA/SH issues will be addressed through dedicated measures in the SEA/SH action plan. The ESMF will include an outline for the SEA/SH action plan which will be prepared before any sub-project activities start and will include roles and responsibilities for the SEA/SH action implementation, dedicated confidential SEA/SH grievance mechanism, trainings and awareness raising on SEA/SH prevention for workers and communities, and Code of Conduct for workers. A mapping of GBV service providers mapping has already been carried out for Türkiye.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

This standard is expected to be relevant within the scope of this project. While the project will aim to exclude or avoid activities which may cause restrictions on land use, land acquisition and/or physical relocation, the land acquisition issues and impacts cannot be completely ruled out. MoIT will not carry out any new land acquisition for the needs of the project. However, it is expected that there may be instances where municipalities carried out land acquisition prior to applying for the Bank financed sub-projects under Component 2. In such instances, sub-project applicants will be required to carry out an Ex-Post social audit to ensure that land acquisition was carried out in line with ESS5 requirements, and that affected people were compensated duly. Also, a screening process will need to be carried out for the usage of existing public lands to ensure that they are free of prior use and whether any formal/informal users will be affected as a result of investments. Therefore, the MoIT will prepare an abbreviated Resettlement Framework (RF), which will outline the land impacts screening procedure, eligibility matrix, compensation methods, consultation with project-affected people, and procedure for conducting an ex-post audit. The draft RF will be prepared, disclosed and consulted before project appraisal.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The standard is not relevant since the sub-projects that would result in adverse impacts on natural or critical habitats as per the standard will not be eligible for financing. This is ensured through the screening procedure set out in the ESMF.

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

This standard is not relevant. There are no known Indigenous Peoples in Türkiye.

ESS8 Cultural Heritage

This standard is relevant. Although the sub-project investments having impacts on cultural heritage will not be eligible for financing within the scope of the project, any civil works or infrastructure works could still inadvertently affect cultural heritage. Therefore, the ESMF will contain an outline of a Chance Find Procedure that will be included in site-specific ES instruments for all earth-moving sub-projects.

ESS9 Financial Intermediaries

This standard is not relevant because the project does not envision involvement of financial intermediaries.



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

N/A

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

Actions to be completed prior to Bank Board Approval:

Prior to Appraisal, the Borrower will prepare, to a level acceptable to the World Bank, consult upon, and disclose the following documents:

- 1. SEP and start implementing as early as possible during project preparation,
- 2. ESMF
- 3. LMP
- 4. RF
- 5. ESCP

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

Prior to Appraisal, the Bank and the Borrower shall agree on a draft ESCP, which will include:

- 1. MoIT hiring/appointing competent E&S staff and maintaining it throughout project implementation
- 2. Continued implementation of the SEP to ensure stakeholder engagement throughout project implementation
- 3. Implementation of the ESMF and preparation of site-specific ESIA, ESMPs, as necessary
- 4. Engagement of project workers under terms and conditions in line with ESS2 and LMP
- 5. Implementation of RF and preparation of Ex-Post audits, as necessary
- 6. Preparation and implementation of the SEA/SH Action Plan
- 7. MoIT’s regular E&S reporting to the Bank
- 8. Capacity building to enhance E&S performance of the implementing agency and key stakeholders in ESF application and ESS compliance.

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

01-May-2023



IV. CONTACT POINTS

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Borrower/Client/Recipient

Borrower: Republic of Türkiye

Implementing Agency(ies)

Implementing Agency: Ministry of Industry and Technology (MoIT)

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s): Natacha Caroline Lemasle, Murat Fatin Onur

Practice Manager (ENR/Social) Anne Olufunke Asaolu Recommended on 15-Dec-2022 at 08:22:31 GMT-05:00

Safeguards Advisor ESSA Abdoulaye Gadiere (SAESSA) Cleared on 16-Dec-2022 at 11:46:20 GMT-05:00