



# Concept Environmental and Social Review Summary

## Concept Stage

### ( ESRS Concept Stage)

Date Prepared/Updated: 09/22/2023 | Report No: ESRSC03736



**I. BASIC INFORMATION**

**A. Basic Operation Data**

Operation ID	Product	Operation Acronym	Approval Fiscal Year
P500777	Investment Project Financing (IPF)	EEP2	2024
Operation Name	Türkiye Second Energy Efficiency in Public Buildings		
Country/Region Code	Beneficiary country/countries (borrower, recipient)	Region	Practice Area (Lead)
Turkiye	Turkiye	EUROPE AND CENTRAL ASIA	Energy & Extractives
Borrower(s)	Implementing Agency(ies)	Estimated Appraisal Date	Estimated Board Date
Republic of Türkiye	Ministry of Environment, Urbanization and Climate Change	12-Dec-2023	28-Mar-2024
Estimated Concept Review Date	Total Project Cost		
03-Oct-2023	310,000,000.00		

Public Disclosure

**Proposed Development Objective**

The project development objectives are to cost-effectively reduce energy use in central government buildings and to develop and pilot a sustainable financing mechanism for energy efficiency investments in central government buildings.

**B. Is the operation 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 Activities**

The Project seeks to further scale-up renovations of central government buildings in Türkiye, building on the lessons from the ongoing Energy Efficiency in Public Buildings Project. The Project would provide financing to the Ministry of Environment, Urbanization and Climate Change to renovate eligible central government buildings, introducing energy efficiency and renewable energy measures, to reduce energy use and associated CO2 emissions. Efforts would be made to support deeper renovations, further market development and training, and to develop a revolving financing mechanism to enable a scale-up of central government building renovations.



**D. Environmental and Social Overview**

**D.1 Overview of Environmental and Social Project Settings**

Energy efficiency (EE) is critical for Türkiye to sustain economic growth and improve energy security while meeting its climate commitments. As of 2021, majority of Türkiye’s primary energy supply was based on fossil fuels. Türkiye’s ratification of the Paris Agreement in October 2021 and its pledge to achieve net zero emissions by 2053 was a strong signal of the commitment to addressing the climate emergency. In 2020, the building sector emitted about one-quarter of the direct GHG emissions from the final consumption sector of the country. In line with these policy requirements and focusing on one of the major GHG emitting sector, the Project will contribute to the reduction of GHG emissions with the EE renovations of 400 buildings.

The scope of the Project is nationwide, and the sub-projects will be in the existing public buildings in the urban/ peri-urban areas. All renovated buildings will be required to receive at least a Turkish Class B Energy Performance Certificate . The Project aims to reach the Turkish NZEB standard for at least 25 % of the renovated buildings. Agreed eligibility criteria for subprojects are defined in the Project Concept Note and considers; the ownership by the central government, no high flood risk, no plans for move, closure, demolition, or privatization of the facility, potential for energy saving, no investments in installation of fossil fuel-based heat generation, being structurally and seismically safe, unlicensed RE investments.

The potential environmental and social risks and impacts are associated with the limited civil works under Component 1 which are described in Section II. Component 2, being mainly technical assistance and project management related, will be neutral for environmental and social risks and impacts. The environmental risks associated with Component 1 activities are traffic, dust, noise and air emissions, generation of waste, traffic, handling of hazardous material and waste, etc. as well as OHS issues.

**D.2 Overview of Borrower’s Institutional Capacity for Managing Environmental and Social Risks and Impacts**

The Project will be implemented by General Directorate of Construction Affairs (GDCA) at MoEUCC, which has the mandate for construction and renovation of central government buildings. GDCA has an existing PIU that is implementing two World Bank projects, the Energy Efficiency in Public Buildings (EEPBP, P162762) and Public and Municipal Renewable Energy Project (P179867). The current E&S staff resources of the PIU which include one environmental, one social, one stakeholder engagement & communications and one occupational health and safety specialist will continue to support the Project as they are already familiar with the Bank procedues and project activities of EEPBP which are almost the same with the new proposed project.

However, the EEPBP is being implemented under the safeguard policies and the PIU has limited experience in implementing a project under ESF, this would hence warrant further capacity-building to strengthen the PIU’s capacity to manage the environmental and social risks as per the ESF. Such capacity building will be realized through project specific training on ESF and for environmentally and socially responsive sub-project planning and implementation.

**II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS**

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

Moderate

**A.1 Environmental Risk Rating**

Moderate

Public Disclosure



The environmental risk is mostly during the construction stage and moderate, as the potential adverse risks and impacts on human populations and/or the environment are not likely to be significant and the Project's risks and impacts can be easily mitigated in a predictable manner. The Project will bring positive impacts in the form of energy efficiency and reduction of air pollution. The negative environmental risks are expected from the civil works under Component 1. These civil works will include the construction of heating/cooling systems/water pumps, energy efficiency interventions, cover building envelope, construction of water heating systems, fans, lighting, and automatic control systems, building renovation, water efficiency improvements, measures for fire safety and renewable energy applications. The environmental risks that may arise from these activities are traffic, dust, noise and air emissions, generation of waste, traffic, handling of hazardous material and waste, etc. as well as OHS issues. The sub-projects are expected to be implemented in the existing public buildings. Activities adversely affecting the known cultural heritage sites other than the building to be renovated and natural/critical habitats (as in ESS8 and ESS6) will be screened out through the ES screening process that would be detailed in the Project Environmental and Social Framework (ESMF). Some of the government buildings selected for renovation under the Project may be registered as cultural heritage in the property inventory. In such cases, MoEUCC will obtain the permits from related institutions of Ministry of Culture and Tourism before any civil works begin. In such cases, civil works will be performed under the allocations of the given Permit. The Project implementing agency, has an existing PIU implementing World Bank Projects under the safeguard policies with limited experience in implementing a project under ESF.

**A.2 Social Risk Rating**

Moderate

The social risk is assessed as moderate considering that the Project activities are limited in the nature and scope to energy efficiency measures which will have standard, temporary and site-specific construction impacts. Social risks and impacts are associated with labor and working conditions, and community health and safety. The project activities that would require land acquisition or lead to economic displacement as referred to in ESS5, will not be eligible for financing. Labor influx risks are low since the majority of the workforce will be engaged locally; only a small number will come from other parts of the country, if necessary. The Project is not expected to have adverse impacts on vulnerable/disadvantaged groups/individuals considering that the project activities will be implemented in the existing public buildings in the urban and peri-urban areas. On the positive side, the Project is expected to generate positive impacts as it will create employment opportunities within the investments financed under the Project.

**B. Relevance of Standards and Policies at Concept Stage**

**B.1 Relevance of Environmental and Social Standards**

**ESS1 - Assessment and Management of Environmental and Social Risks and Impacts**

Relevant

To address potential E&S risks, MoEUCC, will prepare an ESMF, Labour Management Plan (LMP) & Stakeholder Engagement Plan (SEP) in compliance with the national legislation and ESF. ESMF includes relevant Environmental and Social Standards requirements, along with the potential project impacts, as well as rules and procedures for site specific project activities. Based on the E&S screening of the subprojects, either the project level ESMP (which will be a part of the ESMF) or the site specific ESMP will be part of the bidding documents and construction contracts. More details are presented in Section B.4. Activities adversely affecting the known cultural heritage sites other than the building to be renovated and natural/critical habitats (as in ESS8 and ESS6) will be screened out through the ES screening process that would be detailed in the ESMF.



**ESS10 - Stakeholder Engagement and Information Disclosure**

Relevant

The Project stakeholders will include public sector workers/employees, users of services located in central government buildings, as well as residents and business owners residing or operating close to these government buildings. MoEUCC will prepare a Stakeholder Engagement Plan (SEP) to meet the requirements of ESS10 and to ensure engagement with identified stakeholders throughout the Project. The SEP will identify vulnerable/disadvantaged persons, who are more likely to be excluded from the consultation process/not be able to participate in the consultation process and will develop a process to ensure that they are not excluded from consultations and project benefits. The SEP will cover different modalities for engagement with different stakeholders. The Project, in addition to the national and ministry level GMs in Türkiye, will utilize also the GM established for the EEPBP (P162762).

**ESS2 - Labor and Working Conditions**

Relevant

Project workers will include direct (MoEUCC and full time staff) and contracted (consultants, expert, etc.) workers. The Project is not expected to engage community workers. The requirement of primary supply workers will be determined during the project preparation phase. The MoEUCC will prepare an LMP that will outline the policies and procedures for all categories of workers, identify key labor requirements and risks associated with the Project, and assist the MoEUCC in determining the resources required to address project labour issues. For the site-specific civil works, the contractors will prepare LMPs (including Code of Conduct and SEAH risk requirements) that are in line with the project LMP. Türkiye has comprehensive OHS legislations which is generally applicable across all sectors and industries. Both the ESMF and LMP will assess specific OHS risks associated with proposed civil works and identify appropriate risk management and mitigation measures.

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

Relevant

The project design is for increased energy efficiency in the public buildings. Measures to ensure sustainable use of resources will be included in the ESMF and detailed in the ESMPs. The pollution risks and impacts of proposed civil works include traffic, noise and dust emissions, handling of hazardous materials and the generation of construction wastes. The project will address pollution prevention and management measures through the project lifecycle consistent with WB ESF and minimize adverse impacts on human health and the environment. Based on the E&S screening of the subprojects, Project ESMP or the site specific ESMP with additional management plans (if necessary based on the initial assessments) will include the mitigation and monitoring requirements for issues including traffic, dust, noise and air emissions management, waste management. Whenever possible, these measures will instruct use of the locally sourced and renewable materials from licenced and registered facilities.

**ESS4 - Community Health and Safety**

Relevant

Potential community safety and health risks and impacts are mostly associated with construction works. The ESMF, project and site-specific ESMPs will assess the risks and impacts to the health and safety of project-affected communities, including groups that might be vulnerable. These instruments will also detail management and mitigation measures to secure community health and safety during civilworks and operations, as well as monitoring and reporting requirements. . The public buildings will probably need to be in use during the proposed works therefore all works are to be planned and agreed with minimal disruptions and potential risks to the users. The Project

Public Disclosure



will also include measures for addressing SEA/SH risks, including a Code of Conduct for workers, a mechanism to report SEA/SH cases and training and awareness sessions for project workers and affected communities.

**ESS5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement** Not Currently Relevant

**ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources** Not Currently Relevant

Activities adversely affecting the natural/critical habitats will be screened out through the ES screening process that would be detailed in the Project ESMF.

**ESS7 - Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities** Not Currently Relevant

This standard is not relevant since there are no indigenous groups in Türkiye who meet the definition of this standard.

**ESS8 - Cultural Heritage** Relevant

Some of the government buildings selected for installing EE equipment under the Project may be registered as cultural heritage/cultural assets in the property inventory. In such cases, MoEUCC will obtain the relevant permits from related institutions of Ministry of Culture and Tourism before any civil works begin. In such cases, civil works will be performed under the allocations of the given Permit. The relevant permits necessary and the processes to obtain these will be outlined in the ESMF and Cultural Heritage plans may be required as part of ESMPs. Additionally, in the event that any construction takes place, all construction contracts will include a “Chance Find” clause which will require contractors to stop construction in the event that cultural property sites are encountered during construction.

**ESS9 - Financial Intermediaries** Not Currently Relevant

**B.2 Legal Operational Policies that Apply**

**OP 7.50 Operations on International Waterways** No

**OP 7.60 Operations in Disputed Areas** No

**B.3 Other Salient Features**

**Use of Borrower Framework** No

**Use of Common Approach** No

Public Disclosure



### C. Overview of Required Environmental and Social Risk Management Activities

#### C.1 What Borrower environmental and social analyses, instruments, plans and/or frameworks are planned or required by Appraisal?

- Environmental and Social Commitment Plan (ESCP): The WB and MoEUCC will agree on an ESCP, which will set out the material measures and actions required for the Project to meet the ESSs over a specified timeframe. The ESCP will be prepared, disclosed and cleared by WB prior to appraisal and will form part of the legal agreement.
- Stakeholder Engagement Plan (SEP) will be prepared, disclosed and consulted prior to Appraisal.
- Environmental and Social Management Framework (ESMF) will be prepared, acceptable to the Bank that includes relevant Environment and Social Standards requirements, along with the potential project impacts, as well as rules and procedures for site specific project activities. The document will be disclosed, consulted and cleared by the WB prior to project effectiveness. The ESMF will include: (a) a baseline analysis of the country and an overview of the agriculture and earthquake related environmental and social problems; (b) proposed project activities and investments; (c) assessments of the potential E&S risks and impacts and generic mitigation measures; (d) a project level Environmental and Social Management Plan; (e) guidelines and procedures for conducting site specific Environmental and Social Management Plan (ESMP) for proposed activities; (e) outlines of subproject ESMP; (f) requirements for the monitoring plans; (g) implementing responsibilities for site-specific ESMPs; (j) outline of a specialized program for information dissemination and capacity building activities; and, (i) ESMF implementing arrangements, and capacity building activities for the PIU and other involved parties.
- Labor Management Procedures (LMP) will be prepared and disclosed prior to project effectiveness.

### III. CONTACT POINT

#### World Bank

Task Team Leader: Aditya Alexander Lukas Title: Energy Specialist

Email: alukas@worldbank.org

TTL Contact: Jasneet Singh Job Title: Lead Energy Specialist

Email: jsingh3@worldbank.org

### IV. 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>

### V. APPROVAL

Task Team Leader(s): Aditya Alexander Lukas, Jasneet Singh



Practice Manager (ENR/Social)

Sanjay Srivastava Recommended on 22-Sep-2023 at 18:43:55 EDT

ADM Environmental Specialist:

Emre Dolek

ADM Social Specialist:

Oksan Gurtuna Haliloglu