Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 26-Jun-2018 | Report No: PIDISDSA23698

BASIC INFORMATION

A. Basic Project Data

Country	Project ID	Project Name	Parent Project ID (if any)
Turkey	P157683	National Disaster Risk Management Project - Safer Schools	
Region	**Estimated Appraisal Date**	**Estimated Board Date**	**Practice Area (Lead)**
EUROPE AND CENTRAL ASIA	23-Jul-2018	13-Dec-2018	Social, Urban, Rural and Resilience Global Practice
Financing Instrument	**Borrower(s)**	**Implementing Agency**	
Investment Project Financing	Undersecretariat of Treasury	Ministry of National Education	

Proposed Development Objective(s)

The development objective of the project is to increase the safety of students, teachers and staff in selected schools in high-risk seismic zones in Turkey.

Components

Improving Seismic Resilience of Schools
Enhancing Institutional and Technical Capacity for Safer Schools
Project Management
Front-end-fee

PROJECT FINANCING DATA (US$, Millions)

SUMMARY

Total Project Cost	300.00
Total Financing	300.00
of which IBRD/IDA	300.00
Financing Gap	0.00

DETAILS

World Bank Group Financing

International Bank for Reconstruction and Development (IBRD)	300.00

Environmental Assessment Category

B-Partial Assessment

Decision

The review did authorize the team to appraise and negotiate

Other Decision (as needed)

B. Introduction and Context

Country Context

Turkey experienced dramatic urbanization starting from the 1950s as the urban population grew from 25 to 73 percent. This trend led to a rapidly growing urban sprawl without proper planning, and to the construction of public and private infrastructure in marginal and hazardous areas, putting an increasing number of people and assets at risk from disasters and climate change. At the same time, inadequate enforcement of building codes until around the early 2000s and the lack of proper maintenance has resulted in infrastructure vulnerable to damage or collapse in an earthquake. Inadequate protective infrastructure has resulted in limited capacity to effectively manage flood events. The combination of increased exposure and vulnerability has exacerbated disaster and climate risks in Turkey and threatened the sustainability of investments across sectors. After 1999 earthquakes, Turkey has managed to develop significant institutional and technical experience and achievements in coping with earthquakes and other natural disasters. However, the radical policy change towards a proactive approach that addresses disaster risk reduction activities prior to the occurrence of a possible major disaster has not to be fully reflected in policy and practice, and thus important challenges remain for disaster and climate risk management in Turkey.

Sectoral and Institutional Context

Turkey is vulnerable to a wide variety of natural hazards, including earthquakes, landslides, and floods. Among these, earthquakes have claimed the highest number of lives and caused the greatest economic loss, with approximately 90,000 fatalities in 76 earthquakes since 1900, a total affected population of 7 million, and direct losses of US$ 25 billion. Over the last decade, Turkey has initiated several regulatory and institutional reforms to better mitigate and reduce seismic risk. In response to each major earthquake event, new regulations and legislation have been enacted. These revisions have resulted in a consolidated regulatory framework for seismic resilient design and construction of buildings and infrastructure and improved supervision and enforcement of the regulations. To overcome institutional fragmentation, the Disaster and Emergency Management Presidency (AFAD) was established within the Prime Minister's Office in 2009. Turkey's Climate Change Action Plan (2011-2023) identified numbers of actions aimed at increasing national preparedness and capacity to avoid the adverse impacts of climate change and to adapt to its impacts. Since 1993, the World Bank has played a prominent role in financing Turkey's large reconstruction and disaster risk management programs.

To achieve Turkey's ambition of disaster resilience at scale through long-term programming and investment planning, the Government aims to scale up risk reduction interventions in priority sectors. Education is the preeminent sector selected by the Government to substantially and systematically reduce the risk that students and teachers face from earthquakes. Over the past decade, about 3000 schools were retrofitted and reconstructed, which is around 10 percent of the potentially vulnerable school stock. The Ministry of National

Education (MoNE) has rolling education infrastructure projects embedded in the Public Investment Program which is renewed every year and implemented by the Construction and Real Estate Department (CRED). Given the magnitude of the problem, the "National Disaster Risk Management Project – Safer Schools" (NDRMP) aims to complement MoNE's investment cycle until seismic risk assessments and follow-up structural interventions are completed for the entire vulnerable schools in the country. However, for the sake of feasibility and design, the World Bank and MoNE teams decided to tailor the project to address the first tranche of vulnerable schools in the foreseeable future and bring a programmatic approach for further phases.

The proposed NDRMP-Safer Schools Program is designed as a Series of Projects (SoP) in the form of IPFs. Project-1, elaborated in the respective PAD holds a budget of US $ 300 million, whereas the indicative financial envelope for the proposed SoPs could go up to US $ 600 million. Project-1 whose environmental and social management considerations are depicted in the ESMF will (i) be implemented over a period of 5 years, (ii) complement the existing investment program of the Government focused on improving education infrastructure , (iii) be based on the ongoing seismic risk assessments conducted by MoNE in high-risk areas. Subsequent Projects will follow in a phased manner as results of additional seismic risk assessments and school designs are in place. In accordance with the SoP approach, ready-to-go investments will be compiled under subsequent IPFs.

The key factor for the Bank involvement will be the technical assistance and capacity building which would support MoNE to enhance the programmatic aspects and long-term nature of the safe schools agenda. This will be achieved through the technical assistance component which would support improved engineering, structural analysis, and project management capacity in CRED within MoNE. The Capital Investment Strategy which would be developed as a key outcome would present a great value added and would help MoNE plan for not only subsequent Projects under the SoP but also for the Government funded part of the safe schools program. A second key feature of added value will result from the community awareness and citizen engagement activities as risk reduction requires overall acceptance and ownership of school communities including teachers, school staff, students, and parents. A portion of selected schools in high seismic risk zones will be retrofitted or restructured under the NDRMP to demonstrate the increased momentum for a long-term risk reduction program. By the end of the disbursement of the entire financial envelope, the program would have increased the safety of 840,000 students annually, as well as teachers, and staff by improving the seismic performance of approximately 25 percent of the 4,000 most vulnerable school buildings in high-risk seismic zones.

C. Proposed Development Objective(s)

Development Objective(s) (From PAD)

The development objective of the project is to increase the safety of students, teachers and staff in selected schools in high-risk seismic zones in Turkey.

Key Results

D. Project Description

The Project will support the Government of Turkey to develop and implement a Safer Schools Program which is designed as a SoP with a goal to reduce vulnerability and improve the resilience of existing school infrastructure in a programmatic fashion instead of the current piecemeal approach. It will complement the existing investment program of the Government in tackling education infrastructure and will be established upon the ongoing vulnerability assessments conducted by MoNE nationwide. The Project, which facilitates structural interventions on 450 schools reaching out to 420,000 direct beneficiaries annually, will serve the

purposes of deepening long-term risk reduction in schools, technical capacity building in CRED and creating informed communities of students, teachers, staff and parents around safe schools. The project includes three components: (1) improving the seismic resilience of schools; (2) enhancing institutional and technical capacity for safer schools; and (3) project management.

Component 1 will invest in: (i) preparation of a package of priority investments to support risk reduction in existing school buildings across the country's high-risk seismic zones through retrofitting and reconstruction; (ii) civil works for retrofitting or reconstruction of priority education facilities; (iii) conducting additional seismic risk assessments; (iv) development of a national school retrofitting/reconstruction strategy which covers a forward-looking investment strategy and will be used at the next phases of the Program; and (v) communications activities.

Component 2 will enhance CRED's engineering and analytical capacity not only for smooth implementation of this project and through the SoP. As CRED is the responsible body for developing and maintaining all education infrastructure, the enhanced capacity of will also serve for program and projects financed from other resources. The technical assistance component would inform future decision-making processes in the scope of the national safe school program and investments to be channeled by the Ministry through the lifespan of the Program and beyond. In this respect, the Project will facilitate MoNE's efforts to carry out structural analysis and modeling studies, cost-benefit analysis on typical retrofitting and reconstruction designs (including climate resilient design) for various school typologies, damage and loss estimation simulations, climate vulnerability assessments as well as to establish information management systems.

Component 3 will focus on strengthening Government's capacity in operations management and staff capacity for the entire program. The component will invest in operational expenses and staff capacity increase that would be needed for the SoP. The Project will be implemented by MoNE's CRED which has experience in managing design, construction, and maintenance of schools. Considering the increase of financing to be channeled through the CRED once the Project is operational, the component will help strengthen the department's staff capacity by hiring experts in procurement, financial management (FM), disbursement, monitoring and evaluation and environmental and social safeguards.

E. Implementation

Institutional and Implementation Arrangements

The project will be implemented by MoNE through CRED. The department brings extensive experience in managing school infrastructure projects across all 81 provinces of the country. Between 2003 and 2017, MoNE has invested an estimated US$15 billion in school infrastructure. The department has well-qualified technical staff who have significant experience in conducting seismic risk assessments and managing design, construction, and retrofitting contracts. The existing Project Implementation Unit (PIU) of the CRED, which was established in March 2017, is responsible for day-to-day management of the FRIT-financed EIRP (P162004). The same PIU will be responsible for the overall implementation, management, and coordination of the proposed Project.

The department has well-qualified technical staff who have significant experience in conducting vulnerability assessments and managing design, construction, and retrofitting contracts. The PIU drafted an ESMF and may draft an ESIA if needed and will be using that throughout the implementation of the project. PIU will make a site-specific evaluation for each of proposed projects as per national legislation as well as WB Safeguard Policies and integrate them into the ESMPs. Moreover, PIU will guide the construction contractors as well as

the supervision engineering consultants for the preparation of site-specific ESMPs, and assist them during the implementation of the roles and responsibilities (as provided in the ESMF). The awarded contractor will be responsible for the implementation of site-specific ESMPs and for setting up and managing the Grievance Mechanism. PIU will guide and assist the construction contractors and supervision engineering consultants for the preparation of site-specific ESMPs. The preparation and implementation of ESMPs are expected to cost only a small fraction of design and construction cost, as most mitigation measures will be very generic, off-the-shelf, and implementable without specialized skills, experience or equipment. Moreover, it is assumed that the cost is covered in the bid proposals. MoNE will be responsible for the review of all documents and the quality of the site-specific ESMPs. MoNE will submit site-specific ESMPs to WB for prior review, and when the WB is confident that MoNE has demonstrated that the process is accurate, WB will transfer this from prior review to post review.

.

F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)

Investments under Component 1 will be conducted according to the results of prioritization assessment and the locations of the investments are not known at this stage. The project will mainly finance seismic retrofitting works in schools. In addition, when necessary new constructions will be eligible for financing, sometimes associated with demolition of existing school buildings. The use of minimally intrusive technical retrofitting and construction solutions would be promoted. Both retrofitting and reconstruction interventions will have localized minor/moderate environmental impacts. Therefore, impacts can be readily defined, mitigated and monitored. Reconstruction of schools is expected to be undertaken in its own plot which is publicly owned. However, there might be minimal new plots (for new school buildings) needed for this type of structural intervention. Based on its inventory assessment MoNE will chose among plots already allotted for educational facilities and avoid private land take for reconstruction of schools. Therefore, impacts can be readily defined, mitigated and monitored.

G. Environmental and Social Safeguards Specialists on the Team

Sanjay Agarwal, Social Safeguards Specialist
Arzu Uraz Yavas, Social Safeguards Specialist
Esra Arikan, Environmental Safeguards Specialist

SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	The project will involve retrofitting, demolition and reconstruction of schools in different locations of

		Turkey. The exact locations of the schools will be determined during implementation phase according to the prioritization criteria which is presented in the PAD. The prioritization methodology (Annex V of the PAD) for the selection of schools is jointly developed by the Bank and MoNE, and covers comprehensive, objective and scientific criteria that entail structural vulnerabilities and economic lifetime of specific school buildings, social, educational and other administrative considerations. It is independent from income and social level of households in districts where schools are located that enables eliminating/preventing the potential risk of exclusion or elite capture, and its associated social tension. Therefore, investments will include schools that have the highest exposure to seismic risk. The environmental impacts of the proposed projects will be limited to construction impacts. The Turkish Environmental Impact Assessment (EIA) Regulation classifies projects by environmental risks. However, construction of schools is not included in the Turkish EIA Regulation. Within the scope of the WB OP 4.01 the project falls into Category B due to its simple construction works with limited and insignificant impacts; however the projects that fall into category A projects due to their significant environmental and social risks will not be eligible. Potential environmental impacts, which are foreseeable and mitigable, are all related to building construction practices such as noise pollution, asbestos contamination (old pipes, paint used during construction, roofing materials, etc.), emissions of particulate matter/dust to air, domestic wastewater, disposal of excavation materials and hazardous material. the potential social impacts of the project may result from the temporary transfer of students to nearby education facilities during reconstruction activities. Since the locations of the schools will not be determined before Board, a draft Environmental and Social Management Framework (ESMF) is in place and is being finalized by the Borrower.
Performance Standards for Private Sector Activities OP/BP 4.03	No	

Natural Habitats OP/BP 4.04	No	Project locations are not completely defined yet. On the other hand, it is expected that all retrofitting and reconstruction works will be conducted in areas which do not qualify as ??natural habitats, since schools are built and will be built close to residential areas. The ESMF also states that projects which have potential significant impacts on natural habitats and critical natural habitats will not be eligible for financing. The project is designed as a SOP(series of projects), and new set of schools will be determined for potential next phases of the project. If any schools are decided to be built on a natural habitat, the policy may be triggered for the following project phases.
Forests OP/BP 4.36	No	N/A. No schools or investment packages will have implications regarding this OP.
Pest Management OP 4.09	No	N/A. No schools or investment packages will have implications regarding this OP.
Physical Cultural Resources OP/BP 4.11	Yes	The policy is triggered on case: 1. retrofitting works are done on schools which have historical/cultural values. 2. retrofitting/reconstruction works are conducted in close proximity to such properties. 3. new plots may be required and the land has historical/cultural value. Irreversible impacts are not anticipated given strong local ordinances and practices regarding cultural heritage protection. Relevant mitigation and monitoring measures related to conservation of cultural heritage will be integrated into the environmental and social management framework document which will be prepared and disclosed before appraisal stage is completed. The ESMF includes measures to be in compliance with national laws and regulations and WB OP 4.11. Moreover, the ESMF presents the chance find procedures.
Indigenous Peoples OP/BP 4.10	No	N/A.
Involuntary Resettlement OP/BP 4.12	No	Within the scope of the proposed Project, the seismic risk assessments of some 4200 schools with a construction area of 7.8 million m2 with all siting on public land without need of involuntary land take has been conducted. The investment package will be identified among these 4200 schools provided that

all siting on public land without need of involuntary land take.
Consequently, the project is anticipated not to trigger the policy since all retrofitting/reconstruction works will be realized on plots secured by MoNE in terms of the following criteria;

1. The plots are registered as educational facility in the zoning plan and allotted to MoNE
2. There are no ownership issues and MoNE is provided with full usufruct
3. There are no formal or informal users of land
4. There are no pending court cases or legacy issues regarding the plots which have previously been acquired

In accordance with the current practice of school reconstruction, usually the school is demolished and a new one is built within its own plot. However, due to title deed issues or other land issues of the plot, MoNE might need to acquire land or find another plot to rebuild schools. Even if acquisition of new lands are required MoNE will seek for public land or find alternative plots already allocated to MoNE. the same department of MoNE has already gained experience during the implementation of the Education Infrastructure for Resilience Project in terms of not triggering OP4.12. Thus, in this project the same approach in avoiding private land take will be adapted and OP 4.12 will not be triggered.

Furthermore, the loan agreement will indicate that no land take will be eligible for financing. For schools that will have to be rebuilt in a new plot, the plot will be selected from public land designated to MONE and due diligence will take place by the safeguards team to ensure that the plot does not involve any characteristics that could trigger OP 4.12. If new set of schools or investment packages (for the next projects in the series) will include land acquisition, then the next project may trigger the policy. Each project in the series will go through full preparation cycle and ISDS and PADs will reflect the specific conditions that apply, therefore new policies triggered (if needed) will be presented in the future project documents.

Safety of Dams OP/BP 4.37	No	N/A. No schools or investment packages will have implications regarding this OP.
Projects on International Waterways OP/BP 7.50	No	N/A. No schools or investment packages will have implications regarding this OP.
Projects in Disputed Areas OP/BP 7.60	No	N/A.

KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

The project construction works are not expected to have significant or irreversible impacts. However Bank's safeguard policies will be closely monitored to avoid and to mitigate any impacts that may be induced by the project activities. Majority of the environmental impacts anticipated during the Project will be related to building construction works while there will be potential impacts derived from retrofitting, demolition and reconstruction activities. The potential environmental impacts during the construction works will be noise pollution, emissions of particulate matter/dust to air, domestic waste water, disposal of excavation materials and hazardous materials. Besides, due to demolishing activities there is the potential of asbestos contamination which will arise from old pipes, paint used and roofing materials, etc. In terms of social impacts; the project will benefit students to improve access in safer, newer and greener schools. The project is not anticipated to have land requirements that will result in expropriation or any sort of private land take. All plots subject to project activities will be assessed prior to retrofitting/construction activities through a land acquisition checklist filled out by MoNE and a complementary due diligence carried out by the Bank. Other social impacts such as communal and occupational health and safety are not expected to be significant but will comprise of dust, noise, waste management etc. and other safety related issues. These impacts that are anticipated to occur during retrofitting/construction were addressed in the draft ESMF prepared by MoNE. In addition to social risks, the project is anticipated to have some social benefits such as local procurement and employment. Some of the retrofitting/construction contractors assigned by MoNE are likely to hire workers from the subject provinces as well as procuring material from local suppliers.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:

No long term major impact and or an indirect impact is expected.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.

The locations of the schools that will either be retrofitted or reconstructed will be determined according to the needs and priorities of MoNE in line with the safeguards requirements of the World Bank. The prioritization criteria is also a part of the PAD.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

In order to assess the national environmental legislation related to building retrofitting and construction works and to compare them with WB operational policies, an Environmental and Social Management Framework (ESMF) has been drafted. As soon as the exact locations (project footprint) of the schools to be retrofitted or reconstructed are determined, and the retrofitting/reconstruction contracts are awarded, the awarded contractors of MoNE will develop

Environmental and Social Management Plan (ESMP), which also includes site specific ESMP checklists, for each school or each investment package in collobaration with the construction supervisor consultants of MoNE. The ESMF will be considered as an umbrella document for the whole project while the ESMPs and the ESMP checklists will be utilized as per school or investment package based instruments. The ESMF has been consulted with stakeholders and will be finalised by integrting consulation minutes. the final ESMF will b disclosd in country and on Bank's external website. Since exact school locations and information on specific plots are not shared with the Bank yet, due diligence studies have not been conducted. Where possible, Bank experts will make field trips to the plots allocated to investigate and verify that there are no social and environmental safeguards issues. Where a field trip is not possible (due to time constraints and safety limitations) MoNE will be asked to deploy its relevant provincial directorates to fill out a land acquisition checklist prepared by the Bank to provide information on the subject plots. The checklist and its complementary documents (title deeds, allotment decision, demolishing decision, aerial photographs etc.) will demonstrate information such as, current ownership status as well as information on previous ownership, acquisition method, immovable and users on land (if any). According to the results of the due diligence, the Bank will clear and approve of the plots suggested by MoNE. Shall there be any cases where OP 4.12 is triggered the borrower will find alternative plots that will comply with Bank requirements.

MoNE has working history with the World Bank in the previous years, the Project Implementation Unit (PIU), Construction and Real Estate Department, which is heavily involved in bidding and construction phases of civil works and national legislation related to environment and land acquisition, is currently working with the Bank on another project (Education Infrastructure for Resilience,⍰⍰ EU Facility for Syrians Under Temporary Protection). The PIU has gained experience in the preparation of safeguards documents and has familiarized with the requirements of Bank in the mentioned project. MoNE, also has a unit which deals with land acquisition and digital mapping called "GIS and Estate Department" which is also consulted during preparation.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

Among the key stakeholders of the project are students, parents, school administrations subject to the project, host communities, muhtars, relevant provincial directorates of education and governorships where schools are located. For effective stakeholder involvement, it is planned to have public consultation meetings prior to the project activities to inform these key stakeholders on; the project, its schedule and its grievance mechanism should the stakeholders have any grievances through the project life. In order to avoid any negative feedback or misunderstanding from the host communities, it will be important to have a good communications mechanisms in place to disseminate information; community meetings, class based informative school meetings, flyers, brochures, etc. Coordination with the community outreach programs of other services providers are also suggested to enhance citizen engagement. It is suggested that project's potential environmental and social impacts are also discussed with the public via these meetings. the public via these meetings. On the other hand, each of the ESMPs and their ESMP Checklists will be made publicly available on MoNE's website and the physical copies will be available at the offices in the construction yard. In this manner, all stakeholders will have full access to the ESMPs which provides information regarding the potential environmental and social impact and the details of the mitigation measures to be taken.

Community involvement will be sought through timely consultations and school level grievance redress mechanisms will be set up to resolve concerns as they arise. This will be coordinated at the district or provincial level depending on the exact location and grouping of schools for efficiency purposes. Both consultations and grievance mechanisms will consider the different needs and concerns of male and female population.

B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other

Date of receipt by the Bank	Date of submission for disclosure	For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors
31-Jul-2018	06-Aug-2018	

"In country" Disclosure

Turkey

03-May-2018

Comments

MoNE has carried out a consultation with stakeholders and will be completing in country disclosure requirements fully prior to the Negotiations.

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)

OP/BP/GP 4.01 - Environment Assessment

Does the project require a stand-alone EA (including EMP) report?

No

OP/BP 4.11 - Physical Cultural Resources

Does the EA include adequate measures related to cultural property?

NA

Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?

Yes

The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank for disclosure?

No

Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?

No

All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?
Yes

Have costs related to safeguard policy measures been included in the project cost?
Yes

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?
Yes

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?
Yes

CONTACT POINT

World Bank

Elif Ayhan
Senior Disaster Risk Management Specialist

Esse Ayse Erkan Orenbas
Disaster Risk Management Specialist

Borrower/Client/Recipient

Undersecretariat of Treasury
Gokben Yener
Head Of Department

Implementing Agencies

Ministry of National Education
Ozcan Duman
Head of Department

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

APPROVAL

Task Team Leader(s):	Elif Ayhan Esse Ayse Erkan Orenbas

Approved By

Safeguards Advisor:		
Practice Manager/Manager:	David N. Sislen	26-Jun-2018
Country Director:	Johannes Zutt	26-Jun-2018