Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 05/19/2020 | Report No: ESRSA00846
BASIC INFORMATION

A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
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<tbody>
<tr>
<td>Turkey</td>
<td>EUROPE AND CENTRAL ASIA</td>
<td>P170532</td>
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Project Name: Rail Logistics Improvement Project

Practice Area (Lead): Transport

Financing Instrument: Investment Project Financing

Estimated Appraisal Date: 5/5/2020

Estimated Board Date: 5/28/2020

Borrower(s): Ministry of Treasury and Finance

Implementing Agency(ies): Ministry of Transport and Infrastructure

Proposed Development Objective(s):
The project development objective (PDO) is to reduce transport costs in selected rail freight corridors and to strengthen institutional capacity at the Ministry of Transport and Infrastructure (MoTI) to deliver rail freight connectivity and manage rail-enabled logistics centers.

Financing (in USD Million):

<table>
<thead>
<tr>
<th>Total Project Cost</th>
<th>Amount</th>
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<td>350.00</td>
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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]

Building on the findings and results of a Bank-funded Technical Assistance on Last Mile Connectivity/Options to Improve Freight Rail Logistics in Turkey (P165757), the proposed project aims to reduce economic logistics costs by increasing the share of railways in Turkey's freight transport task, through last-mile connectivity improvements and the strengthening of institutional capacity.

Project design is structured around three main components:
• Component 1 – Construction of Railway Branch Lines and Multimodal Connections at Priority Network Nodes. Includes delivery of civil works and construction supervision to build two branching lines in the Çukurova Region and Iskenderun Bay, multimodal (rail and road) last-mile connections to Filyos Port and adjacent industrial zone. The component will also finance civil works for the construction of additional 2 to 3 last-mile rail infrastructure connectivity sub-projects to be selected during implementation from a list of 12 potential subproject sites, based on findings from feasibility studies (including the environmental and social dimensions of feasibility) and detailed engineering designs to be conducted under Component 2.

• Component 2 – Feasibility Studies, Detailed Engineering Designs, Environmental and Social Documentation, and Construction Supervision for Rail Last-mile Connectivity Infrastructure at Additional Freight Nodes. Will include preparation of feasibility studies for 12 potential last-mile rail infrastructure connectivity subprojects pre-identified by MoTI. For those subprojects deemed feasible of implementation, the component will finance detailed engineering designs and environmental and social documentation consistent with the Bank’s Environmental and Social Framework. And for the 2-3 subprojects that are ultimately selected for implementation under Component 1, this component will finance construction supervision consulting services.

• Component 3 – Phase 2 COVID-19 Response Support, Institutional Strengthening, Capacity Building, and Project Implementation Support. Will include support to MoTI to diagnose and mitigate the medium- and long-term impacts of COVID-19 on multimodal logistics, standardization of railway standards, performance improvement in the rail freight sector, and management models for TCDD-owned logistics centers; the component will also finance expanded staffing of the Project Implementation Unit.

D. Environmental and Social Overview

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

Component 1 - The project design and details for Cukurova Region and Iskenderun Bay railway connection (“Çukurova railway”) and Filyos Port/Industrial Zone railway connections (“Filyos railway”) have been further developed within the scope of the feasibility study, and will be finalized under the detailed engineering design by the Project’s design and supervision consultant during the first year of the project.

The Filyos railway will be constructed in Zonguldak province, located in the western part of the Black Sea region. The sub-project will connect Filyos port which is under construction (started in July 2016) and not financed by the Bank, to the already existing railway network. The area is within the designated Organized Industrial Zone (OIZ) set out in the zoning plans. Filyos railway will pass through agricultural, pasture and forest areas. The forest land has been deteriorated due to settlements, agricultural and husbandry activities. There are 2 settlements close to the proposed route, namely Gokceler (2 km) and Sazkoy (1 km) villages with around 300 villagers in each respectively. Filyos port is adjacent to a registered tumulus which is a 3rd degree culturally protected area/archaeological site that has the lowest level of protection status where construction is permitted in accordance with protection and usage judgement based on the decisions of the Regional Preservation Boards. Filyos Port/Industrial Zone connection is partially overlapping with Amasra Coast which is recognized as a Key Biodiversity Area (KBA) according to international standards. Within the Biodiversity Study area, the following habitats have been identified under the ESIA: (i) coastal stable dune grassland (grey dunes), identified as critical area; (ii) permanent mesotrophic lakes, ponds and pools at Filyos Creek; permanent non-tidal, fast, turbulent watercourses; and riparian and gallery woodland. Biodiversity Management Plan (BMP) to be developed at a later stage (after the project appraisal but before the start of physical works) will help identify if the habitats other than grey dunes are critical. However, the project activities have been
designed based on the existing information in the ESIA so as to avoid any impacts on those areas. There are three archaeological sites identified in the project area: (i) Sazkoy, located within the Filyos Railway Dock and Ferry connection route; (ii) Oteyuz Mahallesi, lying between the 2 + 130- 2 + 012 kilometer points of the Section-2 railway branch line and within the impact corridor; and (iii) Ancient City of Tios and Tios Necropolis Area close to expropriation limit.

The Cukurova railway is located in the South of Turkey in Adana and Hatay Provinces and it consists of two main lines with a total length of approximately 36.1 km crossing and includes construction of five stations – expansion of existing Erzin station, and new construction of four stations. The railway will connect the existing Osmaniye OIZ, Ceyhan OIZ, and Ceyhan Energy Specific OIZ planned in the Adana Yumurtalık Freezone (TAYSEB) and Erzin Port. The project area will pass through industrial lands and pasture lands that are used for grazing and crop cultivation. The closest settlement is Yukariburnaz (30 m from the project site). The Biodiversity Study Area identified for the purposes of ESIA includes the Burnaz Dunes KBA – the project design has been informed by the findings of the ESIA and adjusted to avoid potential adverse impacts on the KBA. Also, there are several species identified as endangered and critically endangered by the IUCN Global Red List. Biodiversity Management Plan and several other plans (as listed in the ESCP) are planned to identify specific impacts of the project activities on those species, which shall inform modifications to the project design as/if needed. There are following cultural heritage sites: (i) Isus Ancient Waterway; and (ii) Ancient City of Issos and Erzin Station, which are crossed by the connection line as per the current design. There is also a protected area for groundwater "Burnaz Spring Group Groundwater Reserve and Protection Area", and Yumurtalık Drinking Water Well, which will require alterations to the current project design to avoid impacts. Burnaz Spring Group has been declared to be used as a groundwater operation area (reserve) in 2011 and in relation with it, areas have been defined to protect the resource as; (i) absolute/strict protection area (no activities except limited agricultural activities, animal husbandry, and drinking water boreholes are allowed), (ii) 1st degree protection area (activities such as tourism, industrial, mining, etc. are not allowed), and (ii) 2nd degree protection area (activities such as mining, liquid and solid fuel tanks, gas and LPG stations or similar facilities are not allowed).

The areas of high biological and ecological value as well as the identified cultural heritage sites have been subject of consideration of respective Environmental and Social Impact Assessments and Management Plans (ESIAs and ESMPs), and recommendations provided for avoiding or mitigating the potential impacts, including through the revisions to the project design.

The ESIAs and ESMPs revealed potential impacts on livelihoods of communities in project affected lands, such as Sarimazi neighborhood in Cukurova that happens to be left vulnerable after being affected from multiple large scale infrastructure projects (highway, OIZ and Free Zone) in the region. The Resettlement Plans (RPs) prepared for the project also notes considerable impacts including physical and economic displacement for affected communities in both of the subprojects.

Component 2 - The Project will support the Feasibility Study (FS) of last mile connectivity infrastructure LMCs) for 12 priority freight generation nodes. The Terms of Reference for the Feasibility Study has incorporated tasks to ensure that the FS will be conducted, and that the 2-3 LMCs to be built under the Component 1 would be selected and designed, to meet all requirements of the ESF. The Bank will confirm that the selected 2-3 LMCs fully meet the requirements of relevant ESSs based on the ESIA to be conducted as part of the FS based on the Bank approved TOR, before the start of their construction.

D. 2. Borrower’s Institutional Capacity
The Borrower is the General Directorate for Infrastructure Investments under the Ministry of Transport and Infrastructure (MoTI). While the Ministry has experience implementing a World Bank financed project, the project closed 5 years ago and it was implemented by a different directorate, namely the General Directorate of State Railways of the Republic of Turkey (TCDD). In addition to experience with the World Bank, MoTI has also worked with JICA, EBRD and EIB in very large scale public transport projects in Istanbul. The PIU has been established and currently dedicated staff responsible for environment, land acquisition, procurement and financial management were assigned. MoTI and/or the PIU does not have experience applying the new ESF, nor did it receive the ESF borrower training. Therefore, MoTI hired experienced consultants to prepare key ES instruments and the Bank E&S team provided additional technical support and ESF related guidance for the client staff during project preparation. The Bank will continue to provide ESF support during project implementation and will carry out ESF launch workshop after project effectiveness.

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

A. Environmental and Social Risk Classification (ESRC)

Environmental Risk Rating

Environment risk is rated as Substantial. The key environmental risks identified in relation to the project as revealed by ESIAs are (i) air pollution and noise from construction machinery and quarries and operation phase noise and vibration impacts, (ii) soil disturbance and loss during earth-moving, (iii) loss of vegetation, pest management, (iv) waste management, (v) construction camp management, (vi) community health and safety (traffic safety, earthquakes, avalanches etc. and (vii) potential impacts on culturally and naturally protected areas, (such as habitat loss/fragmentation and/or displacement, invasive alien species, damage to registered cultural/archaeological sites and/or assets), the latter being related to the presence of KBAs, groundwater resources protection area and endangered species in the area defined for studying the biodiversity impacts for the purpose of ESIA (Biodiversity Study Area). Those impacts, which are mostly relevant to construction and operation of the railways, informed the project design accordingly. With adequate mitigation and management, these impacts are assessed to be mostly temporary, predictable and/or reversible, medium in magnitude and in spatial extent. The details of the environmentally sensitive and ecologically valuable areas and aspects, as well as the approach to determining adequate mitigation, as specified under ESS1 below. The experience of the Borrower and the implementing agencies in developing complex Projects is limited in some respects, and their track record regarding ES issues suggests some concerns which can be readily addressed through implementation support. Therefore, the Project environmental risk is confirmed as substantial for the appraisal stage.

Social Risk Rating

Social risk is rated as Substantial. Social risks and impacts are associated with land acquisition, physical relocation, community health and safety, OHS and cultural heritage. Even though land impacts are low, construction of LMCs under the Project including Cukurova and Filyos railways will cause physical displacement and relocation of several houses and other fixed assets, and loss of land and non-land assets and temporary access restrictions to land use in the right of the way (ROW) of the railroads. Land-induced livelihood impacts such as restrictions of access to pasture land and agricultural lands including on vulnerable communities in some parts of project areas were identified for Cukurova and Filyos railways and livelihood restoration measures were introduced in the respective Resettlement Plans (RPs). In addition, there will be some potential access restrictions, minor land acquisitions as well as
construction-induced social impacts under the 2-3 LMCs which will be selected under the FS. Such potential impacts will be identified and mitigation measures developed as part of the FSs in line with the ESF. Significant labor influx risks are not expected. Project workers will be mainly Turkish nationals, and unskilled labor will be hired from local settlements. It is expected that the project will engage maximum 170 construction workers per railway line. SEA/SH risk is assessed as low. Community health and safety risks are moderate and include dust, noise, traffic congestion and accidents, and potential damage of crops. Cukurova and Filyos railways are not in socially sensitive areas, however impacts on cultural heritage sites were identified in ESIA. In addition, the PIU (DG for Infrastructure Investments) does not have past experience with World Bank operational policies and the new ESF, but has an understanding of international standards for environment and social issues as they have engaged in other large infrastructure projects that received international financing from other IFIs. PIU’s capacity will need support from Bank to implement ESF during project implementation. Due to the above-mentioned factors the social risk rating at appraisal stage is Substantial

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 ESIs and ESMPs have been developed by the Borrower for the Filyos and Cukurova railways construction based on the engineering designs prepared during project preparation. Designs of these two railway lines will be reviewed and adjusted where necessary by the design and supervision consultant based on detailed site inspections to be conducted during implementation. The ESIs/ESMPs identified potential adverse impacts related to the railway construction and operation phases, including: (i) air pollution and noise from construction machinery and quarries and operation phase noise and vibration impacts, (ii) soil disturbance and loss during earth moving, (iii) loss of vegetation, (iv) waste generation and management (including hazardous waste), (v) construction camp management, (vi) community health and safety (traffic safety, earthquakes, avalanches etc.), (vii) labor and working conditions (including occupational health and safety), (viii) land acquisition induced physical and economic displacement for individuals and businesses, (ix) impacts on biodiversity and on culturally and naturally protected areas (such as habitat loss/fragmentation and/or displacement, invasive alien species, damage to registered cultural/archeological sites and/or assets), (x) use of pesticides for land clearing, and (xi) borrow areas and spoil management. Contractor level ESMPs are to be prepared before construction starts which will include site-specific measures. WBG General EHSGs and EHS Guidelines for Railways, Toll Roads and Electric Power Transmission and Distribution have been applied for the identification of measures to address ES risks. In addition to the 2 ESIs, 2 ESMPs, 2 RPs, 2 SEPs and 1 LMP, there are 12 additional sub-management plans prepared for the Filyos and Cukurova railways construction as part of the ESIA package. The site-specific ESMPs and sub-management plans for the Filyos and Cukurova railways construction are to be further elaborated based on more detailed information to be collected under detailed site inspections during the early phase of implementation and before the start of bidding process, so that they are reflected in the bidding documents. Though land impacts are low, construction of Filyos and Cukurova railways will cause physical displacement/relocation of several houses, loss of land and non-land assets and land use restrictions in the right of the way (ROW) of the railroads. Land-induced livelihood impacts such as land use restrictions to pasture and agricultural lands including for vulnerable communities in some parts of project areas have been foreseen and livelihood restoration measures are introduced in the respective RPs. It is expected that approximately 1500 parcels (766 in Cukurova and 721 in Filyos) are to be affected by land acquisition. Livelihood impacts on informal
users and vulnerable groups, including those as a result of successive land acquisition they experienced under past large infrastructure projects in the Cukurova region, are expected. In addition to cash compensation, non-cash measures are introduced in the RPs to address potential livelihood losses/economic displacement. Identified vulnerable groups are described under ESS5. The project SH/SEA risk is assessed as low and measures included in ESS 2 and ESS 4.

The ESIAs identified environmentally and culturally sensitive areas located within the area of influence of project activities, and recommended measures and/or alterations to the project design. The ESIAs also specified current information and data gaps in relation to biodiversity and cultural hotspots and suggested studies to be undertaken to inform the assessments and proposed mitigation measures, and incorporated into the final railway design.

For the TA under Component 2 (Feasibility Studies of 12 LMCs and Detailed Engineering Design of two selected 2 LMCs), the requirements of the ESF have been integrated into the ToRs. The outputs of the FS will be used for the decision on 2-3 LMCs to be constructed under Component 1, to ensure their compliance with the ESF. No LMCs with High environmental or social risk based on the FS will be selected. The site specific ESIAs, RPs and SEPs for the 2-3 LMCs will be prepared during implementation stage as part of the FS before the start of construction.

As indicated at the concept stage, and further confirmed through the project preparation, the project area is located, in Filyos, within the physical footprint of the Filyos Port (under construction since 2014 and close to completion) and Industrial Zone (planned), and in Cukurova, within the footprint of the Erzin Port (where construction has not started yet) and Toros Adana Yumurtalik Free Zone/TASYEB (under operation for decades). While these facilities are directly and significantly related to the project, those are neither carried out contemporaneously with the project, nor depend on the project existence. In the framework of the ESIAs, the Borrower has assessed the cumulative environmental and social impact of the construction of project railways within the physical footprint of Filyos Port (in Filyos), and of Erzin Port and Toros Adana Yumurtalik Free Zone/TASYEB (in Cukurova), in order to identify whether there are significant environmental and social risks from the construction and operation of these facilities, which can adversely impact, or can be impacted by the project activities. Such an assessment included review of the status of ongoing construction activities and operation practices, examination of the permits and licenses obtained from the relevant agencies as per the national regulatory requirements, and verification of any cases of major incompliances which are available in the public domain. In addition, regarding the privately owned Erzin Port and TASYEB, MoTI’s ability to influence or control their activities or to access the information on their ES performance is highly limited. The Borrower has searched for any additional information available in mass media sources, and did not locate facts and reports which would be an evidence of serious ES incompliances.

The assessment has not identified any major ES risks to the project activities from the construction and operation of those facilities, which would require any reconsideration of the project design or introduction of mitigation measures in addition to those already envisaged under the respective ESMPs. The ESIAs incorporate the findings of the due diligence and mass media review, and envisage regular monitoring of selected parameters such as air and soil quality, noise and dust level, to be undertaken throughout the project implementation as part of the monitoring plan. In case the monitoring indicates the need to mitigate impacts to the project activities, adequate measures will be developed and implemented by the project.
The associated facilities for the Project are substations for electrification of the railways, including catenary, signalling and telecommunication systems. The detailed design of the substations will be undertaken during the project implementation, and will incorporate consideration and addressing of the ES risks to achieve material consistency with requirements of the ESSs.

In Cukurova, it was proposed to use existing quarries and camp sites formerly used by Highway Directorate General during construction. However, ESIA indicated that some of the sites would not be appropriate for material borrow due to protected area restrictions. Suitable quarries and material borrow sites will be confirmed when designs of these two railway lines are finalized based on detailed site inspections, and the exact ES risks and impacts will be addressed through the site-specific ESMPs. There will be no need for temporary access roads in Cukurova since the construction sites are accessible through the existing roads. 30 kV electrification system will be utilized by Cukurova railway. The details of the substation and the ETL including their location will be determined during implementation by design and supervision consultant, and their ES risks and impacts will be addressed through the updated ESIA.

In Filyos, the utilities of the existing port construction site are planned to be used to the extent possible. However, the details remain unclear until specific technical plans are ready at this stage. 30 kV electrification system will be utilized by Filyos Port/Industrial Zone connection. It is also stated in the ESIA that temporary access roads will be required for construction phase of Filyos. The design details are underway and the related ES impacts and mitigation measures will be addressed in the final design phase and additional studies will be conducted by the borrower.

Some of the vulnerable and disadvantaged groups have been identified under the ESIA of Filyos and Cukurova railways. Identified vulnerable groups include: persons with disabilities, persons lacking health insurance, elderly people over the age of 65 who live alone and need care, persons with chronic diseases, female headed households, households using public land owned by treasury (only ones using for herding purposes), persons whose land has been already affected by other infrastructure or investment projects (highway, railway, oil or natural gas pipelines etc.). Measures will be taken to ensure they will not face disproportionately substantial negative impacts based on ESIA.

FS to be conducted during implementation will also identify vulnerable and disadvantaged groups for 2-3 LMCs to be identified during implementation, and measures will be developed in relevant ESIA/ESMPs so that disproportionately high negative impacts will not fall on them.

The draft ESIA, ESMPs, RAPs, SEPs, LMP and ESCP were disclosed on the official web-site of MoTI on April 30, 2020, with feedback invited from stakeholders and PAPs by May 6, 2020. The summary of feedback is presented under ESS10.

ESS10 Stakeholder Engagement and Information Disclosure

The Borrower prepared two SEPs for already identified sub-projects, namely, Filyos and Cukurova railways construction, as per ESS10 requirements and will carry out the stakeholder engagement activities in line with the SEPs throughout project life. The two SEPs will guide the engagement with local communities and other stakeholders. SEPs will also be prepared for 2-3 LMCs that will be identified based on the FS in line with the ESS10 and following the same form and style of the 2 SEPs prepared for Filyos and Cukurova railways construction, in order to guide engagement of contractor and consultants with local affected communities.
The SEP identified as project-affected parties (PAPs) local communities living in the settlements close to Filyos and Cukurova railways construction (Sazköy, Gökçeler, Derecikören, Aşağııhsaniye, Sefercik and Öteyüz) who may be directly or indirectly affected by the project aspects such as construction impacts (noise, emission, vibration etc.) affecting their quality of life. They may formally and/or informally use private/communal/state/treasury lands with own immovable assets on affected lands, such as herders and other users of project-affected pasture and forestry lands affected by the project whose livelihood activities/income sources may be negatively affected. Other interested parties include local NGOs/CSOs, community leaders, and local government representatives residing or working in the project areas. The key government stakeholders include the Ministry of Environment and Urbanization, Ministry of Agriculture and Forest, Ministry of Industry and Technology, DSI (State Hydraulic Works) and the Ministry of Culture and Tourism.

The SEPs prepared describe the methods of engagement to promote two-way communication between the PIU and different stakeholders continuously throughout the life of the project. The project will rely on the following methods of stakeholder engagement: consultation meetings, in-depth interviews, socio-economic surveys, focus groups, project brochures, phone line, corporate website, GRM. The SEPs also provide information which be be shared with different stakeholders regularly including information about the project, environmental and social risks and impacts, proposed mitigation measures, resettlement plans, grievance redress mechanism etc. As part of the ESIAs, the PIU will maintain and disclose a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback has been taken into account (or reasons if it is not).

Grievance Redress Mechanism: DGII currently uses the national GRM system which is the Presidential Communication Center (CIMER). The DGII will set up its own project and site level GRM through regional offices and site managers as detailed in the SEPs. The main channels for submitting grievances to the borrower’s existing GRM are official letters, phone calls and verbal communication through site personnel.

SEPs disclosure and consultations: Draft SEPs for Cukurova and Filyos and other ESF instruments (ESIAs, ESMPs, RPs, LMP) were disclosed on April 30th, 2020 by DGII and virtually consulted with various stakeholders (including public agencies and PAPs) via video presentations and digital means (documents published on DGII website, links sent via email and SMS info disseminated on other social media accounts of DGII) given the restrictions on public meetings under the COVID-19. DGII has established an online and phone feedback mechanism for stakeholders to provide feedback about the project and disclosed E&S documents. Feedback received has been incorporated to relevant documents. Majority of the feedback received was related to consideration of alternative railway RoW and potential land based impacts such as access to agricultural land and impacts on fixed structures. Feedback received has been incorporated to relevant documents and have been provided to the Bank as of May 11, 2020.

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
Project workers include the direct workers, contracted workers and primary supply workers. The MoTI prepared labor management procedures (LMP) in line with relevant national laws and the ESS2, which will apply to the entire project including the construction of the 2-3 LMCs to be identified during implementation. The project will not engage community workers. Direct workers include: i.) PIU staff, who are employees of DG Infrastructure Investments (AYGM) within the Ministry of Transport and Infrastructure (MoTI), and who are civil servants, and ii.) any technical consultants AYGM may engage during project implementation.

Civil servants involved in project operations, regardless of whether they work full time or part time, will continue to work under terms and conditions of their existing contracts or appointments in the public sector. ESS 2 provisions on occupational health and safety, and prohibition of child and forced labor shall apply to civil servants engaged in the project through LMP.

Contracted workers are workers engaged by the construction contractors to carry out construction works of the two railway lines, and 2-3 additional LMCs to be identified during implementation. It is estimated that the project would not engage more than 170 construction contractors per line. It is expected that the construction works will begin not before the second half of 2021. Construction workers will be accommodated in workers’ camps, which will meet the requirements of labor and OHS legislation of Turkey, and ESS 2, as per LMP. It is anticipated that the project will engage local workers from nearby settlements for unskilled labor, and workers from other parts of Turkey, and possibly from another country for technical work. It is anticipated that technical and skilled staff will live in the accommodation facilities on site (workers camps).

Primary supply workers are those engaged by the firms providing key construction materials such a railway tracks and cement. These sectors are not known to involve significant risks of child labor and forced labor.

Key expected project labor risks are associated with OHS such as exposure to welding hazards, chemicals, dust, noise, working with machinery, excavations, earth works, etc. Based on the experience with previous construction projects in Turkey, it is assessed that overtime hours may be a potential labor risk. The Project SEA/SH risk is assessed as low. The ongoing projects of AYGM did not experience any labor influx issues or issues related to the presence of migrant workers.

Labor Management Procedures: The MoTI prepared labor management procedures (LMP) which include policies and procures to address identified labor and OHS risks, and which will be applicable to all project workers. LMP includes a set of measures such as OHS procedures, working hours, and provides for at least 24 hours of rest after six consecutive day of work. The minimum employment age in the project is 18 years. The LMP includes the workers’ grievance mechanism which will be managed by AYGM and will be applicable to direct and contracted workers. The GRM will be adapted to receive SH/SEA complaints. The project will implement Code of Conduct, and SH/SEA sensitization training will be carried out for the project workers and affected communities. Construction contractors will be responsible to prepare and implement labor management procedures and OHS plans.

Turkish Labor Code (No. 4857) is to large extent consistent with the ESS 2. Turkey ratified all the four Core ILO Conventions and OHS ILO Conventions. The main gap with ESS2 is related to the requirement for the grievance mechanism for workers. While the national legislation provides for Labor Courts to raise labor rights concerns, the Labor Code does not include specific requirements for workplace grievance mechanism. The Labor Code includes provisions to ensure contracted workers are paid, however, it does not include provisions regarding the selection,
management and monitoring of contractors with regard to ESS2 requirements. The LMP addressed these gaps. Labor Code applies to the types of workers who would be considered as contracted workers under ESS2 definition. The law prohibits persons below the age of 18 years to work in hazardous occupations. Forced labor is prohibited by the Turkish Constitution. The Labor Code includes provisions for the minimum wage and sets maximum weekly hours as 45 hours, not exceeding 11 hours daily. The annual limit for overtime work is 270 hours. Overtime hours are paid 1.5 times the normal hourly rate, or 1.25 times for part-time employees. Employees may choose to receive 1.5 times the amount of overtime work as time off in lieu of financial compensation for overtime. Workers are entitled to one paid rest day per week. The law provides for the prohibition of discrimination in employment based on language, race, sex, political opinion, philosophical belief, and religion. Employment may not be terminated on the grounds of race, color, sex, marital status, family responsibilities, pregnancy, birth, religion and political opinion.

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

The Labor Inspectorate under the Ministry of Labor, Family and Social Services has a mandate to enforce labor and OHS laws and conducts regular OHS and labor audits, including unannounced audits. The construction contractors shall be subject to national OHS legislation and ESS 2 requirements. MoTI has a separate regulation on railway safety which applies to the operation phase and which addresses OHS risk management including regulation of significant accidents. The MoTI developed an Occupational Health and Safety Management Plan, included in the ESMP, and will include OHS Plan in the bidding documents in line with World Bank Group Environment, Health and Safety (EHS) Guidelines. It will be ensured that the more stringent standards are used throughout the project. The MoTI will ensure that the contractors develop an Occupational Health and Safety Plan which will include risk assessment, procedures on safety, training, monitoring, incident investigation and reporting. Contractors will be contractually required to monitor and enforce OHS plans.

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

The project is not considered as a water intensive project given its nature and therefore no major risks related to water use or pollution is anticipated. For material supply, the existing and/or nearby Government approved (licensed) quarries are planned to be utilized to the extent possible. The electrification for Cukurova and Filyos railways will be supplied from the closest possible existing ETLs. The major pollution related risks of the planned projects are improper waste and soil management, adverse impacts of construction activities on nearby water bodies, air quality impacts of construction and operation phases. In addition, transport of hazardous wastes during operation phase will require adequate management and mitigation. These anticipated impacts have been analyzed and assessed in detail by the ESIAs and ESMPs for Cukurova and Filyos railways accordingly, including Construction Impacts Management Plan, Community Health and Safety Management Plan, Community Relations Management Plan, Employment and Training Plan, Aggregate Management Plan, Traffic (Transportation) Management Plan, Cultural Heritage Management Plan, Pollution Prevention Plan, Waste Management Plan, Emergency Preparedness and Response Plan, Occupational Health and Safety Management Plan and Biodiversity Management Plan. Water, air quality and soil
mitigation and monitoring plans are incorporated into the ESMPs, the client is overly responsible for the implementation of the ESMPs which contain specific responsibilities for contractors, ensuring that the mitigation and monitoring measures are implemented on site. In Filyos, there is a potential to make use of blasting for construction activities. However, the location of the blasting, amount and type of the explosives and timeframe of the blasting is not known at this stage and therefore the relevant assessment will be done at the detailed design phase and necessary mitigation measures will be described in the scope of the site-specific ESMPs including Community Relations Plan on informing communities in the vicinity about the blasting. During operational phase of the project, use of pesticides can be required for railway vegetation clearing in the scope of maintenance works.

The impacts of groundwater resources are assessed through the Cukurova ESIA study. Accordingly, the impacts on groundwater resources’ quality and quantity would be medium in magnitude and short-term given that the construction activities will not involve any deep excavation except bridge, underpass and overpass foundations which will be limited. Furthermore, no new quarry and borrow sites are planned to be created in the vicinity of the Project site. With the mitigation measures as (i) establishment of appropriate drainage measures (concrete underground drainage, head ditch) to be used for the control of surface waters and groundwater (ii) ensuring the stability of the cuts and fillings to be produced along the routes and to remove them from the fill body and (iii) proper implementation of the Emergency Preparedness and Response Plan that covers management of hazardous and chemical substances and Pollution Prevention Plan, the impacts can be reduced. However, it is also stated that the consent from the State Hydraulic Works Agency (DSI) must be obtained to go forward with the project, so the residual impact significance remains as moderate.

The impact assessment for noise levels in both Cukurova and Filyos routes indicate that the operational phase noise levels will be exceeding the WBG noise level guideline values for out of doors (specified for residential; institutional; educational receptors). In the ESIA it is suggested that with relevant mitigation measures including reducing the emissions of wagons and railway line, optimizing of average speed of trains, developing vegetative barriers, construction of noise shoulders using soil materials, design and construction of noise barriers and regular noise monitoring would reduce the level of impact to moderate. The site-specific ESMPs will ensure specific measures to be implemented during construction phase. The Borrower will arrange for the post-mitigation noise modelling, and this action is stated as a separate commitment under ESCP. The air quality models conducted for both Filyos and Cukurova routes concluded that there will not be any significant adverse impacts on the receptors as long as the recommended mitigation measures are implemented. Wastes (non-hazardous and hazardous) to be generated at the construction and operation phases of the projects will be managed with respect to national regulations and international best practices. The pollution prevention and waste management plans have been prepared for the construction contractor to further tailor with respect to site-specific information.

It was proposed to use existing quarries formerly used by Highway Directorate General during construction. However, ESIs indicated that some of the sites would not be appropriate for material borrow due to protected area restrictions. Suitable quarries and material borrow sites will be confirmed when designs of these two railway lines are finalized based on detailed site inspections, and the exact ES risks and impacts will be addressed by MoTI and contractors through the site-specific ESMPs. Within the scope of the project, appropriate storage areas will be determined for the excavation surplus material storage and necessary expropriation procedures will be carried out within this scope. The contractor will provide storage sites with sufficient capacity to store all excavated material. When sufficient storage areas are installed, the Project will not have an additional impact on existing local excavation
waste disposal infrastructure capacities. There is an aggregate management plan prepared to manage the risks and impacts associated with the materials management and it is to be further developed after the detailed design is completed and tailored by the contractor for site-specific requirements.

ESS4 Community Health and Safety

Community health and safety impacts of the project are associated with noise and air emissions, traffic management and temporary blockades, disturbances to local communities associated with presence of construction workers and worker camps. The project ESF instruments identified likely impacts during the construction and operational phases on community health and safety, mitigation measures, monitoring and reporting requirements. The site-specific ESIs prepared for Filyos and Cukurova railways construction also assessed the potential scale and risk due to natural hazards associated with floods, earthquakes, landslides, and avalanches. Emergency Preparedness and Response Plans (EPRPs) will be prepared for both construction and operation phases for each LMC railway to be built under the project to address specific risks identified, subsequently.

A separate Community Health and Safety (CHS) Plan has also been prepared (as a part of the ESIs and ESMPs) to address impacts/risks on: (i) people and livestock; and (ii) communicable diseases; GBV. The site-specific Traffic Management Plans (TMP) cover management of traffic safety risks, accident prevention, training programs, relevant stakeholder engagement activities and site safety awareness and access restrictions.

Labor influx: The location of workers camps for Cukurova and Filyos railways have not been determined yet; already existing workers camp sites in nearby construction areas of other entities are under consideration to be used as work camp areas. It is estimated that there will be a maximum of 170 workers per LMC railway and that approximately 100 workers will use the camp site accommodation per camp. It is anticipated that technical and skilled staff will use the accommodation facilities on site, while other workers will be accommodated at their own homes. The project will aim to hire local people from nearby settlements as unskilled workers. The Contractor will be required to appoint designated community liaison persons as part of the CHS plan who will keep local communities informed of project implementation schedule, expected impacts and other relevant issues, and receive grievances or feedback from them. It is not expected that designated security personnel will be used for road and railway construction and operation phases. The project SH/SEA risk is assessed as low. The project will implement Code of Conduct, and SH/SEA sensitization training will be carried out for the project workers and affected communities. The GRM will be adapted to receive SH/SEA complaints.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The Borrower has made efforts to avoid agriculturally significant and residential areas as much as possible while planning Filyos and Cukurova railways routes. The land impacts are associated primarily with the right of way (RoW) and sub-station sites. The construction of project components will require permanent land tak including pasture and private lands. The maximum width of railway RoW is planned to be 40 meters in Cukurova railway sub-project and 60 meters in Filyos railway sub-project. It is expected that 2-3 LMC railways to be identified during implementation will follow similar technical parameters. Permanent land acquisition will also be required for stations, which are small, fixed structures; there are 5 stations in Cukurova and 2 in Filyos Port/Industrial Zone connection. the number of stations to be built for 2-3 LMC railways to be identified during implementation will be known as part of the FS;
efforts will be made to reduce the impact on private land and non-land assets. The villages in the area of influence of the Cukurova subproject are Yukari Burnaz and Asagi Burnaz, and Gokceler and Sazkoy and Asagi Ihsaniye in Filyos railway sub-project.

It is expected that the construction of Cukurova and Filyos LMC railways will result in physical displacement/relocation and economic displacement. Types of affected lands include forest land, pasture land, treasury land and private lands. It is expected that the construction of Cukurova and Filyos LMC railways will affect approximately 1,500 landowners; 766 people in Cukurova and 721 people in Filyos. One house in Cukurova and 17 houses in Filyos (out of which 15 are currently abandoned and not in use), and several other fixed assets such as a coal storage facility, a truck loading area and parking lot, barns, sheds, water wells/fountains/tanks, greenhouses and trees are also found to be affected. Land-based livelihood impacts are also expected due to loss of agricultural land and limited access to pasture land where animal husbandry activities are carried out. The exact scale and scope of impact will be confirmed or modified based on detailed site inspections to be conducted during implementation.

Available data suggests that 7 informal users may be affected by the construction of Cukurova and Filyos LMC railways. Some PAPs have experienced expropriation in the past due to infrastructure development projects, making them vulnerable to additional impacts due to the project. RPs classify them as vulnerable people with entitlements for additional livelihoods support. Other vulnerable groups include: persons with disabilities, persons lacking health insurance, Elderly people over the age of 65 who live alone and need care, persons with chronic diseases, female headed households. They will be provided with some additional assistance defined in the RPs.

For the construction of the 2-3 LMCs to be identified during implementation, the Borrower will carry out Feasibility Studies (FS) during implementation based on the TOR acceptable to the Bank, and prepare site specific Resettlement Action Plans based on the result of FS, in order to ensure their compliance with the ESS5. TOR for the FS includes requirements to assess potential impacts on land and non-land assets as part of the assessment of 12 LMCs, take into account the result in the identification of 2-3 LMC railways to be built under Component 1 and prepare a site-specific RAP for each of them in line with the Bank’s ESS5. The Bank’s No Objection will be required to include within the project scope the construction of the 2 to 3 LMCs identified under the FS.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Construction of railway connectivity structures may affect forest ecosystems, including natural habitats and areas of conservation value. The ESIAs conducted separately for Filyos and Cukurova railways, including biodiversity assessments and critical habitat assessment, identified the biodiversity hotspots within the Biodiversity Study Area, and provided recommendations to the project design, specifically where any revisions or alterations are required. Where design alterations are not feasible and the impacts are found to be manageable through proper mitigation, the ESMPs provide for respective measures to be fine-tuned through further final design surveys and site-specific information. Where sufficient data is not available due to the uncertainties with the engineering design and seasonal restrictions for undertaking field surveys during the period of the ESIA study, the ESIA indicates these missing information and the steps to be taken later on to obtain those data and revisit the ESIA, ESMPs and inform the project design as needed – such as additional filed surveys to study the breeding and migration patterns particularly
of migratory birds, Biodiversity Management Plans to be developed, etc. The details of the findings of the ESIA and proposed approaches are specified under ESS1.

The potential adverse impacts on the species in Cukurova and Filyos will be reduced to minor and negligible levels through a set of mitigation measures set out in the ESIA. These include limiting land preparation and construction activities and vegetation clearance to designated work areas and preservation of the vegetative soil layer to utilize after construction, monitoring of habitats and associated species through land preparation and construction and development of habitat and species specific measures, informing and training of project personnel on the sensitivity of natural habitats, species on-site speed limits and animal passages, conservation priorities, identification of nesting areas through pre-construction surveys, avoiding breeding seasons of animals, avoidance of project related air, soil, waste, noise and water impacts on natural habitats, conducting pre-construction surveys to identify target species that would be adversely impacted by fragmentation and planning of passages for such species, measures to prevent animal mortality (fencing, sound signals, chemical repellents, lights and reflectors, etc.). Furthermore, invasive alien species will be prevented by several measures including checking of arriving machinery and equipment to the site, conservation of natural vegetation and use of native species for restoration, applying vegetation management measures other than using herbicides and monitoring. In the operation phase, the natural habitat will be restored to enable the species to re-inhabit in the area, statuses of habitats and associated species populations will be monitored, animal mortality will be kept under control through strategies related to existing passages and construction of new ones as appropriate, establishment of noise barriers, applying erosion control measures, prevention of waste, wastewater impacts through the use of appropriate sub-management plans, use of natural plants for restoration and periodic controls of trains to prevent invasive alien species.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
The standard is not relevant. There are no Indigenous Peoples in Turkey.

ESS8 Cultural Heritage
In the framework of the ESIA studies carried out for the Cukurova and Filyos railway sections respectively, the cultural heritage sites have been identified to be in the vicinity or overlapping the project area of influence. The actions envisaged for each identified site are as follows:

Filyos railway:
- Sazköy 3rd Degree Archaeological Site: since it is within Filyos Railway Dock and Ferry Connection route, the route change is recommended. In case route change is unfeasible, test pit and salvage excavations in the areas where the railway route cuts the site is recommended.
- Öteyüz Mahallesi 1st and 3rd Degree Archaeological Site; construction activities to be within the construction boundaries, and the site is to be supervised by an archaeologist during the period of construction.
- Ancient City of Tios and Tios Necropolis Area: the project activities should be carried out under close supervision of an archaeologist.

Cukurova railway:
- Isus Ancient Waterway: route revision is recommended in a way that it does not damage the ancient waterway. If such a revision is not possible, it is recommended to re-plan the route with viaducts in the sections where the route cuts the ancient waterway in order to avoid destruction of the ancient structure.

- Ancient City of Issos - connection line pass through the borders of the ancient city. This part also includes existing Erzin Station (Station Building-Logistics Directorate building), which is a registered cultural asset and avoided by the project design. It is recommended to avoid the site.

For Cukurova project, the significance of impacts on cultural values are determined as low while the severity of impact is high. The reason is given as the small portion of the Ancient City of Isus (1.86%) and the Aqueduct (9.33%) being impacted while those values are spread over a very large area.

While the ESIAs have identified the sites, analyzed potential risks and proposed measure to avoid or mitigate the impacts, a Cultural Heritage Management Plan shall be prepared to suggest site-specific measures, after recommended design modifications and revisions are developed. Furthermore, respective national authorities should be approached for guidance and permissions as needed. These measures are both in line with the requirements of ESF ESS8 and the national legislation of Turkey, which all have to be met before the project activities commence. The project construction involves excavation, earth movement, borrow areas, which may result in chance finds. The ESIA study requires contractors to prepare chance find procedures as part of contract-specific ESMPs, which will be approved by the Engineer prior to the start of physical works.

ESS9 Financial Intermediaries
Project does not involve any 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. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

<table>
<thead>
<tr>
<th>DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED</th>
<th>TIMELINE</th>
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<tbody>
<tr>
<td>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</td>
<td></td>
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<tr>
<td>Establish and staff the PIU with one environmental, one social, one OHS and one Stakeholder Engagement specialist throughout the project implementation</td>
<td>12/2020</td>
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<tr>
<td>Update and finalize ESIAs and ESMPs as necessary based on the results of the additional studies &amp; detailed site inspections to be conducted during implementation, including consideration of E&amp;S risks of associated facilities (substations and electricity transmission lines), approach to alternative</td>
<td>03/2021</td>
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analyses, E&S assessment of project facilities (quarry sites etc.) and the ToR for the 3rd party monitoring consultant for the project E&S supervision and reporting

<table>
<thead>
<tr>
<th>Task</th>
<th>Completion Date</th>
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<tbody>
<tr>
<td>Incorporate the relevant provisos of ESIAs and ESMPs ESF provisions into tender documents</td>
<td>12/2021</td>
</tr>
<tr>
<td>Incorporate ESF requirements in the Feasibility Studies prior to selection of LMCs for detailed designs</td>
<td>03/2021</td>
</tr>
<tr>
<td>Prepare, disclose and consult ESF documents for the associated facilities (sub-stations and electricity transmission lines), as confirmed by the final detailed design</td>
<td>06/2021</td>
</tr>
<tr>
<td>Prepare, disclose and consult ESF documents for the project facilities (quarries, access roads, material storage sites, construction camps) as confirmed by the detailed design</td>
<td>06/2021</td>
</tr>
<tr>
<td>Incorporate the requirement to comply with ESMPs, RAPs, and LMPs, including the requirement to produce Contractor’s ESMP (based on ESMPs produced as part of ESIAs), RAP, LMP’s GRM for Contractor’s personnel, and ESHS Code of Conduct, into bidding documents for civil works contracts.</td>
<td>03/2021</td>
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**ESS 10 Stakeholder Engagement and Information Disclosure**

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<thead>
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<th>Task</th>
<th>Completion Date</th>
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<tr>
<td>Disclose, consult with stakeholders, finalize (based on the received feedback), re-disclose and implement throughout the project life the SEPs prepared for Filyos and Cukurova railways construction both sub-projects.</td>
<td>02/2021</td>
</tr>
<tr>
<td>Prepare, adopt and implement additional SEPs for the selected 2 LMCs that will be identified based on the FS in line with the ESS10 and following the same form and style of the 2 SEPs prepared for Filyos and Cukurova railways construction subprojects</td>
<td>06/2021</td>
</tr>
<tr>
<td>Establish project-level GRM and maintain GRM Log throughout the project life</td>
<td>12/2025</td>
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**ESS 2 Labor and Working Conditions**

<table>
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<tr>
<th>Task</th>
<th>Completion Date</th>
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<tr>
<td>Implement LMP throughout project implementation</td>
<td>12/2025</td>
</tr>
<tr>
<td>Establish, maintain, and operate grievance mechanisms throughout project implementation for direct and contracted workers and obligate contractors to provide GRM for their personnel for civil contracts</td>
<td>12/2025</td>
</tr>
<tr>
<td>Ensure all Contractors adopt and implement OHS measures as detailed in ESIAs/ESMPs throughout project implementation</td>
<td>12/2025</td>
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**ESS 3 Resource Efficiency and Pollution Prevention and Management**

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<thead>
<tr>
<th>Task</th>
<th>Completion Date</th>
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<tr>
<td>Incorporate pollution prevention measures into contractors' ESMPs</td>
<td>12/2025</td>
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</table>
Obtain permit for the Burnaz Spring Groundwater Protection Area from State Hydraulic Works Agency (DSI) | 01/2021
---
Prepare Construction Materials Management Plan | 06/2021
---
Update the ESIs to incorporate the post-mitigation operational phase noise modeling after design of the mitigation measures (barns, noise barriers) | 03/2021
---

**ESS 4 Community Health and Safety**

Incorporate, and implement throughout project implementation, traffic and road safety measures in ESMPs/contractors' ESMPs | 06/2021
---
Incorporate, and implement throughout project implementation community health and safety measures in ESMPs/contractors' ESMPs | 06/2021
---
Incorporate and implement throughout project implementation emergency risks into contractors' ESMPs | 06/2021
---
Implement throughout project implementation SEA prevention measures including Code of Conduct | 06/2021
---

**ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

Update, disclose, discuss, consult with stakeholders, and finalize RAPs for Filyos and Cukurova railways construction based on the result of detailed design | 02/2021
---
Establish, adopt and implement compensation arrangements as per the site-specific RAPs (Entitlement Matrix) for the affected parties due to physical and economic displacement including and livelihood losses. | 07/2021
---
Develop site-specific RAPs for each of the 2-3 LMC railways to be identified during implementation | 03/2021
---

**ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

Undertake studies and update the ESIs and ESMPs Filyos:
- Survey on otter population and habitat preference
- Migratory birds seasonal study
Cukurova:
- Survey to obtain seasonal data to update the critical habitat assessment for migratory birds | 12/2020
---
Detailed Design revised to avoid:
(i) Critical habitat area for species identified by ESIA
(ii) If additional study confirms so, critical habitat for migratory birds
(iii) If no permit from DSI, Burnaz Spring PA | 02/2021
---
Update the Filyos and Cukurova ESIAs and Biodiversity Management Plans 02/2021

ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

ESS 8 Cultural Heritage

Incorporate Chance Finds Procedure into all civil works contracts and obligate contractors to adhere 06/2021

Revise the detailed design to avoid the impacts on the following cultural heritage sites:
- Isus Ancient Waterway;
- Ancient City of Issos;
- Sazkoy site 01/2021

Obtain permits from the Ministry on Culture on Isus Ancient Waterway, Ancient City of Issos, Sazkoy site, Oteyuz Mahallesı site, Ancient City of Tios 12/2020

ESS 9 Financial Intermediaries

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

Is this project being prepared for use of Borrower Framework? No

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

Given the substantial environmental and social risk of the project and that the implementing entity does not have significant experience in working with the World Bank requirements – wither those required under Social and Environmental Safeguards Policies and new ESF – Borrower’s E&S Framework will not be used.

IV. CONTACT POINTS

World Bank

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Borrower/Client/Recipient

Borrower: Ministry of Treasury and Finance

Implementing Agency(ies)
Implementing Agency: Ministry of Transport and Infrastructure

V. FOR MORE INFORMATION CONTACT
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Web: http://www.worldbank.org/projects

VI. APPROVAL
Task Team Leader(s): Luis Blancas Mendivil, Murad Gurmeric
Practice Manager (ENR/Social) Javaid Afzal Cleared on 19-May-2020 at 13:23:45 EDT
Safeguards Advisor ESSA Nina Chee (SAESSA) Concurred on 19-May-2020 at 14:21:59 EDT