FRIT II– IMPROVING MUNICIPAL SERVICES IN REFUGEE AFFECTED AREAS IN TURKEY (P169996)

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

FEBRUARY 2020
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<th>Description</th>
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<td>AF</td>
<td>Additional Finance</td>
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<tr>
<td>CHSS</td>
<td>Community Health Safety Standard</td>
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<td>DMA</td>
<td>District Metering Areas</td>
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<td>DSI</td>
<td>State Hydraulic Works</td>
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<tr>
<td>E&amp;S</td>
<td>Environmental and Social</td>
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<tr>
<td>EIA</td>
<td>Environmental Impact Assessment</td>
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<td>EIB</td>
<td>European Investment Bank</td>
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<td>ESCP</td>
<td>Environmental and Social Commitment Plan</td>
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<td>ESF</td>
<td>Environmental and Social Framework</td>
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<td>ESIA</td>
<td>Environmental and Social Impact Assessment</td>
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<tr>
<td>ESMF</td>
<td>Environmental and Social Management Framework</td>
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<tr>
<td>ESMP</td>
<td>Environmental and social Management Plan</td>
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<tr>
<td>ESMS</td>
<td>Environmental and Social Management System</td>
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<tr>
<td>ESS</td>
<td>Environmental and Social Standard</td>
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<td>EU</td>
<td>European Union</td>
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<td>FCV</td>
<td>Fragility-Conflict-Violence</td>
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<td>FRIT</td>
<td>Facility for Refugees in Turkey</td>
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<td>PDO</td>
<td>Project Development Objective</td>
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<td>GHG</td>
<td>Green House Gases</td>
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<td>GoT</td>
<td>Government of Turkey</td>
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<td>IBA</td>
<td>Important Bird Area</td>
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<td>IBRD</td>
<td>International Bank for Reconstruction and Development</td>
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<td>IFI</td>
<td>International Finance Institution</td>
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<td>ILO</td>
<td>International Labour Organization</td>
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<td>IUCN</td>
<td>International Union for Conservation of Nature</td>
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<tr>
<td>JICA</td>
<td>Japan International Cooperation Agency</td>
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<tr>
<td>KBA</td>
<td>Key Biodiversity Areas</td>
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<td>LMP</td>
<td>Labour Management Procedure</td>
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<td>MoEU</td>
<td>Ministry of Environment and Urbanization</td>
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<td>MSP</td>
<td>Municipal Services Project</td>
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<tr>
<td>NGO/CSO</td>
<td>Non-Governmental Organisation/Civil Society Organization</td>
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<td>NRW</td>
<td>Non-Revenue Water</td>
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<td>NWMP&amp;AP</td>
<td>National Waste Management Plan and Action Plan</td>
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<td>OHS</td>
<td>Occupational Health and Safety</td>
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<tr>
<td>p.e.</td>
<td>Population equivalent</td>
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<td>PIF</td>
<td>Project Information File</td>
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<td>PIU</td>
<td>Project Implementation Unit</td>
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<td>PMU</td>
<td>Project Management Unit</td>
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<td>RF</td>
<td>Resettlement Framework</td>
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<td>RP</td>
<td>Resettlement Plan</td>
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<td>SCADA</td>
<td>Supervisory Control and Data Acquisition</td>
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<td>SCP</td>
<td>Sustainable Cities Project</td>
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<td>SEA</td>
<td>Sexual Exploitation and Abuse</td>
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<td>SEF</td>
<td>Stakeholder Engagement Framework</td>
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<td>TURKSTAT</td>
<td>Turkish Statistical Institution</td>
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<td>UN</td>
<td>United Nation</td>
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<td>WB</td>
<td>World Bank</td>
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<td>WWTP</td>
<td>Wastewater Treatment Plant</td>
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EXECUTIVE SUMMARY

Following the protracted political crisis in Syria since 2011, Turkey has become the largest refugee hosting country, serving as a transit hub and a reception country for irregular migrants and refugees from the region. Almost 3.9 million refugees, mostly Syrians are registered as refugees under temporary protection. Overwhelming majority (around 90 percent) live in urban areas especially in the South Eastern region as well as a number of other provinces across the country. Municipalities have played an essential role in developing more resilient capacities in response to the increased demand for services.

The provinces of Adana, Kahramanmaras, Osmaniye, Kayseri and Konya are among several provinces in Turkey impacted by the influx of refugees. In 2018, these five municipalities had a refugee population of about 500,000 people. As a result, urgent interventions in municipal infrastructure to augment existing systems are required. Investments to be financed under Facility for Refugees in Turkey (FRIT) II – Improving Municipal Services in Refugee Affected Areas in Turkey directly addresses municipal services priorities, particularly through construction and rehabilitation of water supply, wastewater and solid waste facilities in targeted five provinces (Adana, Kahramanmaras, Kayseri, Konya, and Osmaniye) affected by the Syrian refugees in Turkey.

According to a 2018 Needs Assessment Report prepared for the EU, the international community has also continued to support Turkey in meeting the challenges of dealing with the refugee situation, providing over €4 billion since 2016 alone, of which 95% consists of assistance from the European Union (EU). This includes the EU Facility for Refugees in Turkey (FRIT), which is a € 3 billion fund launched in 2016 and designed to support the GoT with hosting refugees, € 600 million EU support outside of the FRIT and over € 400 million in bilateral support from EU countries. Other donors, various UN agencies, international, national and local civil society organizations, as well as International Financial Institutions (IFI’s), have also been playing an important role in Turkey’s refugee response, implementing a diverse range of programs and projects, accounting for over €200 million.

According to the EU Needs Assessment, water supply and solid waste management is likely to become a severe problem for Turkey in the near future. The provinces located in the south east of Turkey in particular, have seen the greatest negative impact, facing issues such as water scarcity problems and significant stress on existing wastewater treatment facilities as well as inappropriate domestic waste management practices.

The proposed project aims to improve water supply, wastewater and solid waste services in selected municipalities that have seen significant population increases as a result of refugee arrivals.

**Project Development Objective**

The Project Development Objective is to improve host and refugee communities access to safely managed water supply, sanitation and solid waste services in targeted municipalities affected by the influx of Syrians Under Temporary Protection in Turkey.

**Project Components**

The project would finance construction and rehabilitation works for water, wastewater and solid waste facilities to address the urgent needs in the affected municipalities.

Proposed activities will include:
(a) Construction and/or rehabilitation of water supply infrastructure;
(b) Construction and/or rehabilitation of wastewater systems;
(c) Construction of solid waste landfill;
(d) Supervision of construction and/or rehabilitation works in (a), (b) and (c), and installation of equipment; and
(e) Provision of technical assistance for project management, supervision and capacity building to ILBANK's Project Management Unit (PMU) and Project Implementation Units (PIUs) of the sub-borrowing municipalities/utilities.

The project will have two components:

**Component 1 – Environmental Infrastructure Investments:**

Subprojects planned to be financed under Component 1 are given in Table 1.

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<th>No</th>
<th>Activity Name and Scope</th>
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<td>Adana</td>
<td>1-1</td>
<td>Kozan Imamoglu Yedigoze Drinking Water Transmission Line</td>
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<td>1-2</td>
<td>Yedigoze Water Treatment Plant</td>
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<td>Kahramanmaras (Centrum) Drinking Water Project</td>
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<td>Ceyhan Basin 4 Wastewater Treatment Plants</td>
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<td>5-2</td>
<td>Osmaniye (Centrum) Sewerage Project</td>
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**Component 2 - Technical Assistance for Project Management and Supervision, Capacity Building, Communication and Citizen Engagement:**

**Implementing Agency**

The implementing agency for the project is ILBANK. ILBANK is a financial intermediary and it will transfer the received grant from the EU under the Facility for Refugees in Turkey and the IBRD loan to borrowing municipalities/utilities for the financing of identified sub-projects of targeted municipalities.

**Objective of Environmental and Social Management Framework**

For the current project, an Environmental and Social Management Framework (ESMF) has been prepared, because, while types of sub-projects to be financed under the Project have already been pre-identified, the risks and impacts of which cannot be fully determined until the sub-project details have been identified. The ESMF examines the overall risks and impacts of the project and determines the scope of the comprehensive environmental and social
management approach to be adopted, for each sub-project, to address the potential environmental and social impacts of the FRIT II Municipal.

The ESMF sets out the principles, rules, guidelines and procedures to assess the environmental and social risks and impacts; and it contains measures and plans to reduce, mitigate and/or offset adverse risks and impacts to be applied through sub-project preparation and implementation to ensure that social and environmental issues are systematically addressed at the subproject stage.

**POLICY, REGULATORY AND INSTITUTIONAL FRAMEWORK FOR ENVIRONMENTAL AND SOCIAL ASSESSMENT**

**Institutional and Legal Framework for Environmental Protection and Conservation in Turkey**

The Ministry of Environment and Urbanization (MoEU) is the responsible organization for the implementation of policies adopted for protection and conservation of the environment, and for sustainable development and management of natural resources.

**The Turkish Regulation on EIA**

Under Article 10, Environmental Law sets out the general scope of the Environmental Impact Assessment (EIA) procedure in Turkey, indicating that institutions, agencies and establishments that lead to environmental problems as a result of their planned activities are required to prepare Environmental Impact Assessment report or Project Information File (PIF).

The EIA Regulation is largely in line with the EU Directive on EIA. The key relevant steps of the Turkish EIA procedure, i.e. screening, public consultation, scoping, disclosure and supervision, are briefly reviewed below in the order they are prescribed to occur.

**National Laws on Social Impacts**

Although the Turkish EIA Regulation does not entirely meet the requirements of international standards in terms of social impacts, it does include some legal provisions for managing various social impacts and stakeholder engagement. In this respect, the social and legal framework applicable for this project should be considered under below classification:

- National Laws on Labour and Working Conditions
- National Laws on Land Acquisition
- National Laws on Right to Information Acquisition
- National Environmental Impact Assessment Regulation

**International Agreements and Conventions**

The Turkish national policy on environmental protection, cultural heritage and conservation of biological resources was developed on the basis of relevant international agreements signed or ratified by Turkey. The construction and operation of the subprojects have, as a minimum, to comply with the national policy.

**World Bank’s Environmental and Social Standards**

The World Bank’s new Environmental and Social Framework (ESF) will apply to the Project. The Environmental and Social Standards (ESSs) contained in the ESF, set the requirements to be met by Borrowers with respect to the identification, assessment and reduction/mitigation of
social and environmental risks and impacts associated with projects supported by the Bank through Investment Project Financing. Nine (as ESS 7 will not apply) out of the ten ESSs establish the standards that the Borrower and the project will meet through the project life cycle.

In accordance with the ESSs, the World Bank Group’s Environment, Health and Safety (EHS) Guidelines should be apply to the project as follows:

- World Bank Group’s EHS General Guidelines;
- World Bank Group’s EHS Guidelines for Water and Sanitation; and
- World Bank Group’s EHS Guidelines for Waste Management Facilities.

**Key Differences Between the Turkish EIA Regulation and the WB ESSs**

The Turkish EIA procedures are, with some exceptions, in line with the WB’s ESSs. The primary exceptions are in project categorization, scope of environmental and social assessment, and public consultation. Differences between them are described and gap filling measures provided in Section 2.7. In cases where the Turkish legislation differ from the ESSs, the more stringent one will be applied to the project implementation.

**BASELINE ANALYSIS**

Most of the targeted municipalities already experienced operational problems in municipal service delivery such as high water losses, inadequate water treatment, inadequate access to wastewater collection, and lack of wastewater treatment due to deficiencies in financial capacity and insufficient institutional capacity. Also, the sudden increase in population, has put additional pressure on infrastructure and municipal services, and catalyzed the need for immediate action.

The social and economic baseline of the five provinces are provided in the ESMF in detail.

**ENVIRONMENTAL AND SOCIAL MANAGEMENT PROCESS**

A number of steps and procedures needs to be followed to determine and manage the environmental and social impacts of subproject activities. The stages of this process are defined below

1. E&S screening of subproject proposals
2. E&S assessment of the proposed subprojects
3. Development of site-specific E&S instruments for subprojects as required, based on the screening outcome
4. Public disclosure of subproject-specific E&S documents
5. Stakeholder consultation on the draft E&S documents
6. World Bank approval of the E&S documents
7. Incorporation E&S documents into bidding documents and later – into contracts for the provision of works
8. E&S supervision and monitoring of subprojects’ implementation
INSTITUTIONAL ARRANGEMENTS AND CAPACITY FOR ENVIRONMENTAL AND SOCIAL MANAGEMENT

Institutional Arrangements

Key actors in the implementation of the ESMF are the ILBANK PMU and project proponent municipalities/utilities.

ILBANK PMU

ILBANK PMU will maintain both existing environmental and social specialists within the scope of this project to coordinate the implementation of the ESMF. Responsibilities of this unit are given in detail in the ESMF.

Municipalities/Utilities

Beneficiary municipalities/utilities will be responsible for E&S assessment of subprojects. They are expected to undertake this task mainly through the consulting companies of which there is an adequate number in Turkey. Municipalities are used to carry out infrastructure investments and are familiar with Turkish environmental legislation and construction procedures.

ESMS, Labour and Working Conditions and OHS of ILBANK

Area of Operation

The scope of the work includes water network, water treatment plant, sewerage network, wastewater treatment plant and landfill facilities, paving and road construction activities of local authorities, bridge construction and similar infrastructure projects as well as superstructure works. In addition to its domestic business partners, ILBANK has extensive cooperation with various international organizations such as the WB, European Investment Bank (EIB), JICA and Islamic Development Bank in the field of domestic operations as well as in the use of loans and funds abroad.

Environmental and Social Management System

In scope of the Quality Management System Studies, ILBANK has received TS-EN-ISO: 9001-2015 Quality Certification. ILBANK does not have a separate Environmental and Social Management System (ESMS) nor set of procedures for ESMS.

The key procedural documents managing the project’s environmental and social screening, review and monitoring procedures for subprojects are the ESMF and Resettlement Framework (RF) which are implemented throughout the lifetime of the international funded projects. For the World Bank-financed projects, these framework documents are integrated into the Project Appraisal Documents and Project Operational Manuals and the core elements are referred in the Loan Agreements. Therefore, ILBANK becomes fully responsible for the satisfactory implementation of the safeguard framework documents.

Environmental and Social Management Capacity

ILBANK’s International Affairs department has experienced staff in technical, procurement, environmental, social and financial management (FM)-related procedures of the World Bank. ILBANK staff received numerous trainings related to the World Bank’s safeguard policies, and more recently – the ESF, as a part of the ESF Borrower Training roll out program.
Labour and Working Conditions (as per ESS2)

Occupational Health and Safety

Turkey’s OHS legislation is comprehensive and is generally applicable across all sectors and many industries.

ILBANK has a separate OHS Policy. As a government agency, ILBANK is subject to national law on OHS of the Ministry of Family, Labour and Social Security.

For the substantial risk sub-projects, ILBANK will require that the sub-borrower municipality/utility ensures that OHS measures are undertaken according to the national OHS law, World Bank’s Environmental and Social Standard 2 for Labour and Working Conditions (WB ESS 2) and the World Bank Group General Environmental Health and Safety Guidelines.

All ILBANK facilities are equipped with fire safety instruments as required by local regulation.

Labour and Working Conditions

ILBANK has published a corporate level Human Resource Policy (Official Gazette numbered 28518, January 4, 2013) that is in line with national regulations as well as WB requirements.

The document defines the employee personal rights including working hours, leave (maternity, social events, unpaid), financial rights, working conditions, promotions etc.

ILBANK is committed to ensure compliance of its own operations and those of any contractors or sub- contractors working at the Project with the provision of the following:

- The Turkish Labour Law
- WB ESS 2 Requirement
- ILBANK Human Resource Policy

ILBANK will put specific policies in place intended to maximise beneficial impacts of the Project and to minimise or mitigate its potential adverse impacts:

- a Human Resources Policy that prioritises local residents in employment, thus maximising socio-economic benefits to communities closest to operations;
- specific anti-discrimination policies and grievance management procedures.

Key management measures, reporting and monitoring of unregistered/uninsured employment of refugees, unequal employment opportunities for women etc. that may occur in civil works that ILBANK’s or borrowing municipality’s contractors are undertaking, will be covered under the project’s Labour Management Procedures.

Grievance Redress Mechanism for Municipalities

ILBANK puts high priority on the satisfaction of citizens of the project-beneficiary municipalities. For this purpose, project municipalities will assign a Community Liaison Officer to log and manage grievances and feedback mechanism of the subproject. Grievances will be assessed and resolved by the municipality, and ILBANK will be informed.

Response/redress of grievance will be communicated to petitioner by the municipality. ILBANK will monitor functionality of the grievance redress mechanism of each municipality to ensure that it runs smoothly and provides fair and timely resolution to grievances.
FRIT II – Improving Municipal Services in Refugee Affected Areas in Turkey

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

1 PROJECT DESCRIPTION

1.1 Introduction and Context

1.1.1 Country Context

The Republic of Turkey achieved strong economic and social development performance since 2000, leading to increased employment and incomes. More recently, growing economic vulnerabilities and a more challenging external environment are threatening to undermine these achievements. Turkey has maintained a long-term focus on implementing ambitious reforms in many areas, and government programs have targeted vulnerable groups and disadvantaged regions. Poverty incidence more than halved over 2002-15, and extreme poverty fell even faster. During this time, Turkey urbanized dramatically, maintained strong macroeconomic and fiscal policy frameworks, opened to foreign trade and finance, harmonized many laws and regulations with European Union (EU) standards, and greatly expanded access to public services.

Following the protracted political crisis across in Syria, Turkey has become the largest refugee hosting country, serving as a transit hub and a reception country for irregular migrants and refugees from the region. With almost 3.9 million refugees, more than 3.6 million are registered Syrian refugees under temporary protection. The rest are under international protection or are asylum seekers of other nationalities. Only a small share (approximately 10 percent) resides in camps, while the rest (90 percent) live outside camps, mostly in urban areas. Municipalities are among the primary responders in addressing the impact of the Syria crisis, and they have played an essential part in the development of more resilient capacities able to respond to the increase in demand for services. The refugee crisis has resulted in a substantial increase in the population of many municipalities across Turkey, especially in the South Eastern region as well as a number of other provinces across the country. While in numerical terms, the size of refugee populations in some of the major metropolitan cities in Western Turkey such as, Istanbul, Bursa, and Izmir are equal to or higher than in these provinces, the impact in the smaller cities is higher as the same provinces are also among the least developed in the country. As such, their capacity to absorb the large influx of refugees is limited. Some negative socioeconomic impacts are evidenced through competition over jobs, rising rents, growing demand for municipal services and capacity distress in social services such as education and health infrastructure. Most of the provinces hosting a high concentration of Syrians are already more vulnerable or disadvantaged cities in Turkey, which exacerbates the development challenges for Turkey.

The provinces of Adana, Kahramanmaras, Osmaniye, Kayseri and Konya are among several provinces in Turkey impacted by the influx of refugees. In 2018, these five municipalities had a refugee population of about 500,000 people. The increased populations have put significant pressure on existing municipal infrastructure including water supply, wastewater, and solid waste management services in affected host communities. As a result, urgent interventions in municipal infrastructure to augment existing systems are required. Investments to be financed

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1 According to DGMM and UNHCR, as of December 2018 there are 3.9 million refugees in Turkey. This total includes Syrians (3.6 million), Afghan (170,000), Iraqis (142,000), Iranians (39,000), Somalis (5,700), and other nationalities (11,700).

2 Source: Strengthening Municipal Resilience in Response to the Impact of the Syria Crisis in Turkey, 3RP
under Facility for Refugees in Turkey (FRIT) II – Improving Municipal Services in Refugee Affected Areas in Turkey directly aims municipal services priorities, particularly construction and rehabilitation of water supply, wastewater and solid waste facilities in targeted five provinces (Adana, Kahramanmaras, Kayseri, Konya, and Osmaniye) affected by the Syrian refugees in Turkey.

1.1.2 Sectoral and Institutional Context

A legal framework was established to tackle challenges due to the influx of refugees in Turkey by issuing Law No. 6458 on Foreigners and International Protection in 2013 and Regulation No. 29153 on Temporary Protection of Syrians in 2014. While the primary responsibility for emergency response and coordinating humanitarian needs are fulfilled by the Prime Minister Disaster and Emergency Management Authority (AFAD), relevant ministries and local authorities, depending on their respective area of jurisdiction, assume responsibility to provide registered refugees with access to municipal services, education, healthcare, social services, and labour markets.

Since the onset of the conflict in Syria in 2011 the Government of Turkey (GoT) has taken a highly proactive stance in responding to refugee needs, including the provision of free healthcare and education possibilities, as well allowing legal access to the labour market. According to recent statements, since the beginning of the Syrian crisis and until the end of 2017, the GoT had spent an estimated €31 Billion to meet needs of refugees and hosting communities. According to a 2018 Needs Assessment Report prepared for the EU, the international community has also continued to support Turkey in meeting the challenges of dealing with the refugee situation, providing over €4 billion since 2016 alone, of which 95% consists of assistance from the European Union (EU). This includes the EU Facility for Refugees in Turkey (FRIT), which is a € 3 billion fund launched in 2016 and designed to support the GoT with hosting refugees, € 600 million EU support outside of the FRIT and over € 400 million in bilateral support from EU countries. Other donors, various UN agencies, international, national and local civil society organizations, as well as International Financial Institutions (IFI’s), have also been playing an important role in Turkey’s refugee response, implementing a diverse range of programs and projects, accounting for over €200 million. These efforts have been geared primarily towards facilitating refugee’s access to available public services and strengthening capacities of state institutions to this end at the national and local levels. Many municipalities most impacted by the refugee influx have difficulties in identifying and prioritizing their needs. Yet municipal budgets continue to be determined according to the number of host populations. In general, due to high budget pressure and time limitations, municipalities are tending to solve daily problems rather than looking into long term planning.

According to the EU Needs Assessment, water supply is likely to become a severe problem for Turkey in the near future. To counter this challenge, the Government has embarked on an extensive modernization and development process to improve water quality nationally, to ensure all rural and urban residential and industrial areas have access to drinking water and water treatment facilities. However, the sizeable population increase due to hosting refugees has caused an unexpected stress on this modernization program. The provinces located in the south east of Turkey in particular, which remain the prime target of the Turkish Government’s development program, have seen the greatest negative impact, facing issues such as water scarcity problems and significant stress on existing wastewater treatment facilities.

While piped water coverage is relatively high in Turkey, more than 60 percent of water is distributed untreated. According to Municipal Water Statistics prepared by TURKSTAT in 2016, 98% of the population living in municipalities has access to piped water supply but only 59% are served by a water treatment plant. Non-Revenue Water (NRW) in utilities across the
country is high, including physical losses averaging about 36 percent country-wide. The municipalities targeted in this project face significant water supply service challenges, including inadequate water treatment facilities, and high unaccounted for water due to ageing and poorly managed transmission and distribution infrastructure. In Kahramanmaras and Osmaniye, NRW is estimated at around 70% and 56%, respectively. These conditions have impacted the quality of services provided to the existing populations. The added pressure due to the increased population from the refugee influx is further exacerbating the quality and quantity of water supplied to the population.

Although the population in Turkey with access to sewage networks is relatively high, a significant proportion of wastewater is discharged untreated into the environment. According to TURKSTAT Municipal Wastewater Statistics for 2016, 90% of the population living in municipalities are served with a sewage network. However, only 70% of the municipal population is served with a wastewater treatment plant. In individual municipalities coverage is lower, and the quality of sewerage infrastructure is inadequate, resulting in sewage leakages which impact the environment. These conditions not only impact the environment, but also lead to significant increases in operation and maintenance costs of the system.

Yearly solid waste production figures indicate that a substantial amount of waste is expected due to refugee linked population increase. For example, in Kilis the waste amount collected is 133% more than the regular amount collected prior to the refugee influx. This increase has major impact on the lifetime of waste collection vehicles and equipment as well as disposal sites. Existing waste disposal capacities are also being overstretched. While solid waste collection rates in Turkey are relatively high, a significant proportion of the waste is not disposed properly in landfills. According to 2016 National Waste Management Plan and Action Plan (NWMP&AP) data, just over 60% of the municipal waste is sent to sanitary landfills, 28% is dumped into municipal dumpsites, and 11% was reported as recycled, composted or disposed of by other methods. In some of the targeted municipalities affected by refugees, such as Kahramanmaras, challenges relating to waste management have increased significantly.

The proposed project aims to improve water supply, wastewater and solid waste services in selected municipalities that have seen significant population increases as a result of refugee arrivals. Most of the municipalities in these provinces already had operational problems such as high water losses, inadequate water treatment, inadequate access to wastewater collection, and lack of wastewater treatment due to deficiencies in financial capacity and insufficient institutional capacity. However, the increased population, put additional pressure on infrastructure and municipal services, and catalyzed the need for immediate action.

The GoT has requested grant financing from the European Union under its Facility for Refugees in Turkey (FRT) for a project to support municipal services in refugee affected areas.

1.2 Project Development Objective and Key Results

The Project Development Objective is to improve host and refugee communities access to safely managed water supply, sanitation and solid waste services in targeted municipalities affected by the influx of Syrians Under Temporary Protection in Turkey.

The project will seek to achieve the following results, in line with the project development objectives:

(a) increased access to safely managed water supply services in targeted municipalities;
(b) improved access to safely managed sanitation in targeted municipalities;
(c) improved wastewater treatment in targeted municipalities;
(d) improved solid waste disposal in targeted municipalities; and
(e) strengthened institutional capacity to manage municipal services in municipalities and utilities in an efficient, equitable and socially responsive manner.

1.3 Project Components

The project would finance construction and rehabilitation works for water, wastewater and solid waste facilities to address the urgent needs in the affected municipalities. The proposed approach also covers independent supervision for the review of designs and construction/rehabilitation works. Targeted capacity building activities are also proposed to increase capacity within municipalities and water and sewerage utilities to operate and maintain the respective facilities to ensure sustainable service delivery to the entire population.

Proposed activities will include:

(a) Construction and/or rehabilitation of water supply infrastructure;
(b) Construction and/or rehabilitation of wastewater systems;
(c) Construction of solid waste landfill;
(d) Supervision of construction and/or rehabilitation works in (a), (b) and (c), and installation of equipment; and
(e) Provision of technical assistance for project management, supervision and capacity building to ILBANK's Project Management Unit (PMU) and Project Implementation Units (PIUs) of the sub-borrowing municipalities/utilities.

The project will have two components:

Component 1 – Environmental Infrastructure Investments: This component will finance the construction and rehabilitation works for water supply, sanitation and solid waste management facilities in the five municipalities, to achieve improvements in access, service quality and continuity of services. Water supply investments will include, but not be limited to construction and/or rehabilitation of water treatment plants, rehabilitation or extension of water distribution networks and transmission lines, expansion of water reservoir capacities, NRW reduction activities such as installation of SCADA systems and development of district metering areas (DMAs), and targeted interventions at the household level, where appropriate, to ensure that all customers have access to safe water supply. Wastewater investments will include construction of new wastewater treatment plants (WWTPs) or increase their capacity, and construction of new or extension of existing sewerage collection networks. Solid waste facilities will include construction of a new waste landfill in one municipality, closing of existing dumpsites, and provision of waste collection and transfer equipment.

Component 2 - Technical Assistance for Project Management and Supervision, Capacity Building, Communication and Citizen Engagement: This component will finance goods and consultancy services for project management, consultancy services for design review and supervision of municipal infrastructure investments, citizen engagement, public communication and visibility activities, and institutional capacity building activities targeting the participating municipalities, utilities and Iller Bank. Targeted capacity building activities are also proposed to increase capacity within municipalities and water and sewerage utilities to operate and maintain the respective facilities to ensure sustainable service delivery to the entire population.

Brief description of subprojects planned to be financed under Component 1 is given in Table 2.
## TABLE 2. BRIEF DESCRIPTION OF SUBPROJECTS

<table>
<thead>
<tr>
<th>Target Area</th>
<th>No</th>
<th>Activity Name and Scope</th>
</tr>
</thead>
</table>
| Sub-Comp 1: Adana | 1-1| Kozan Imamoglu Yedigöze Drinking Water Transmission Line  
- Construction of 35.4 km water transmission line to Kozan (Ø700 mm – Ø1,400 mm ductile iron pipes) with auxiliary structures (washout and air relief valve chambers, etc.)  
1-2 Yedigöze Water Treatment Plant  
- Construction of water treatment plant with a capacity of 115,776 m³/day (1,340 l/s)  
1-3 Kozan Pinargozu Drinking Water Transmission Line and Network  
- Construction of 310 km water network and renewal of existing transmission line (28.12 km and Ø300 mm pipe)  
- Construction of 8 pumping stations, 4 water reservoirs, 2 collection tanks and auxiliary structures |
| Sub-Comp 2: Kahramanmaras | 2-1| Kahramanmaras Northern Districts Integrated Solid Waste Project  
- Construction of a new landfill in Afsin including a composting facility and a separation facility and construction of 2 transfer stations in Elbistan and Goksun  
- Procurement of waste collection equipment (container and pick-up trucks)  
- Closure of existing dumpsites  
2-2 Kahramanlaras (Centrum) Drinking Water Project  
- Rehabilitation and construction works in water distribution network  
- Installation of SCADA systems  
- Rehabilitation of existing water reservoirs and pumping stations  
- Construction of a water reservoir  
2-3 Kahramanmaras (Centrum) Sewerage Project  
- Rehabilitation and construction works of 400 km sewerage network  
- Construction of 100 km storm water network  
2-4 Ceyhan Basin Wastewater Treatment Plants  
Construction of 4 WWTPs including collector lines:  
- Ekinozu WWTP: Construction of WWTP (for 12,350 people in 2037 with a capacity of 889 m³/day, 14,750 people in 2052 with a capacity of 1,062 m³/day) and construction of collector line (0.95 km of Ø400 concrete pipes, 1.1 km of Ø200 concrete pipes, 23 manholes, 1 pumping station)  
- Caglayançer WWP: Construction of WWTP (for 15,000 people in 2038 with a capacity of 1,650 m³/day, 17,600 people in 2053 with a capacity of 1,936 m³/day)  
- Andirin WWTP: Construction of WWTP (for 11,600 people in 2037 with a capacity of 1,591 m³/day, 15,000 people in 2052 with a capacity of 2,057 m³/day) and construction of collector line (4.23 km of Ø400 concrete pipes, 3.51 km of Ø200 concrete pipes, 163 manholes, 1 pumping station and 600 m of Ø200 HDPE pressure line)  
- Goksun WWTP: Construction of WWTP (for 25,000 people in 2037 with a capacity of 5,508 m³/day, 30,000 people in 2052 with a capacity of 6,480 m³/day) and construction of collector line (4.617 km of Ø600 HDPE Pipes, 107 Manholes)  
2-5 Elbistan Drinking Water Network Project  
- Rehabilitation of 255 km water network and house connections (4,128 pieces)  
- Construction of 3 km pressure lines  
- Construction of 6 water reservoirs  
- Construction of 5 pumping stations  
2-6 Elbistan Drinking Water Transmission Line  
- Construction of 120 km water transmission line and 6 water reservoirs (volumes b/w 100-2,000 m³) |
1.4 Implementing Agency

The implementing agency for the project is ILBANK. ILBANK is a financial intermediary and it will transfer the received grant from the EU under the Facility for Refugees in Turkey and the IBRD loan to borrowing municipalities/utilities for the financing of identified sub-projects of targeted municipalities. ILBANK is subject to Turkish national laws and regulations and has adopted international standards and policies for the management of environmental and social issues through working with International Financial Institutions (IFIs). However, ILBANK does not have a certified Environmental and Social Management System (ESMS) covering its entire portfolio. Projects that ILBANK finances through international financing are governed by specific E&S framework documents based on the international standards. For the World Bank-financed operations, this would be an Environmental and Social Management Framework (ESMF).

ILBANK has established an International Affairs Department which oversees and administers all internationally financed projects. This Department utilizes key procedural documents for internationally financed investments. ILBANK’s International Affairs department has assigned staff in technical, procurement, environmental, social and FM related procedures of the WB. ILBANK staff received numerous trainings related to the World Bank’s safeguard policies and more recently - the Environmental and Social Framework (ESF) as a part of the ESF Borrower Training roll out program. ILBANK’s E&S team consists of 2 technical experts - one acting as the environmental focal point and the other - as the social development/land acquisition focal point. For each subproject’s environmental and social risk identification and monitoring, ILBANK and the World Bank E&S teams conduct regular meetings, discussions and joint meetings with the sub-borrowers as necessary. ILBANK and the World Bank teams also conduct site visits during subproject risk identification and implementation. ILBANK team gained significant experience during the implementation of previous projects financed by the World Bank.

Until now, ILBANK has managed many WB, EIB, and JICA-financed projects. The World Bank-financed projects include Municipal Services Project (MSP) 1 and 2 and Sustainable Cities Project (SCP) 1 and 2. Furthermore, SCP 2 AF has recently been approved.

The E&S documents prepared for this project’s environmental and social management are ESMF, Resettlement Framework (RF), Stakeholder Engagement Framework (SEF), subproject-specific Environmental and Social Impact Assessment (ESIA) reports and/or Environmental and social Management Plans (ESMPs), Resettlement Plans (RPs) and Labour Management Procedures (LMPs) which are implemented throughout the lifetime of the project.
The framework E&S documents are integrated into the Operational Manual of the project and the core elements are referred in the Loan Agreement. Therefore, ILBANK is thus fully responsible for the satisfactory implementation of the E&S documents.

1.5 Purpose of Environmental and Social Management Framework

In accordance with the WB ESF, for the current project, an ESMF has been prepared. This is because, while types of sub-projects to be financed under the Project have already been pre-identified, their location, number and design will be further defined during implementation, making it impossible to assess the exact environmental and social footprint during preparation. The ESMF examines the overall risks and impacts of the project and determines the scope of the comprehensive environmental and social management approach to be adopted to address the potential environmental and social impacts of the FRIT II - Municipal.

The ESMF will comply with both the WB ESS for FRIT II and the national legal framework contained in the Regulation on Environmental Impact Assessment (henceforth “EIA Regulation”) (Official Gazette No. 29186, November 25, 2014). The ESMF is the key document committed by ILBANK to comply with national legislation and WB’s ESF and to be shared with stakeholders before implementation starts.

The ESMF forms the scope of the comprehensive environmental and social management approach that has been adopted for identifying and addressing the potential environmental and social impacts of the FRIT II - Municipal. The ESMF consolidates and facilitates understanding of all necessary policy and regulatory features of the Turkish Government as well as the WB ESSs relevant for the project.

The ESMF sets out the principles, rules, guidelines and procedures to assess the environmental and social risks and impacts; and it contains measures and plans to reduce, mitigate and/or offset adverse risks and impacts to be applied through sub-project preparation and implementation to ensure that social and environmental issues are systematically addressed at the subproject stage. The application and implementation of the ESMF will thus guide the integration of social and environmental aspects into the decision-making process at all stages related to the planning, design, execution, operation and maintenance of subprojects.

2 POLICY, REGULATORY AND INSTITUTIONAL FRAMEWORK FOR ENVIRONMENTAL AND SOCIAL ASSESSMENT

2.1 Institutional and Legal Framework for Environmental Protection and Conservation in Turkey

Turkish environmental regulations were developed in line with national and international initiatives and standards, and some of them have recently been revised to be harmonized with the EU Directives in the scope of Turkey’s pre-accession efforts.

The Ministry of Environment and Urbanization (MoEU) is the responsible organization for the implementation of policies adopted for protection and conservation of the environment, and for sustainable development and management of natural resources.

The MoEU (central organization) is based in Ankara and it has provincial directorates in each province. The MoEU has an overall coordinating role for the development and implementation of environmental policies in Turkey, including the approximation process for the EU environmental Acquis. The central organization is mainly composed of the following primary directorates and departments:
Main environmental responsibilities of the MoEU are summarized below:

- Prepare the legislation on environment, public works, and housing development and monitor and audit the related implementations;
- Identify the principles and policies on environmental protection, rehabilitation of environment and prevention of environmental pollution, develop standards, criteria and programs in this context; outline the principles for implementing and monitoring these standards and criteria; undertake the works related to climate change;
- Assess the impacts of all facilities/activities that pollute the environment due to their activities resulting in solid, liquid or gaseous waste disposal/discharge into receiving environments; monitor, audit and issue the permits of such facilities/activities;
- Perform the measurements/analyses and monitoring studies concerning receiving environments;
- Establish the plans and policies regarding the global climate change and measures to be taken against its effects.

For the management of environmental issues, MoEU collaborates with other ministries (including their provincial organizations where relevant), government agencies and relevant stakeholders, such as; Ministry of Transport and Infrastructure (General Directorate of Highways, General Directorate of Infrastructure Investments), Ministry of Agriculture and Forestry (General Directorate of Nature Protection and National Parks, General Directorate of Water Management, General Directorate of State Hydraulic Works, General Directorate of Forestry, General Directorate of Meteorological Services, General Directorate of Agricultural Reform), Ministry of Culture and Tourism (General Directorate of Cultural Heritage and Museums), Ministry of Energy and Natural Resources (General Directorate of Mining and Petroleum Affairs, General Directorate of Mineral Research and Exploration), Ministry of Family, Labour and Social Services (General Directorate of Occupational Health and Safety, General Directorate of Labour) and Ministry of Health (General Directorate of Health Services, General Directorate of Public Health).

The Turkish Environmental Law (Law No: 2872; Date of Ratification: 1983), which came into force in 1983, addresses environmental issues on a very broad scope. According to the basic principles that govern the application of the Environmental Law, and as stated in the Constitution, citizens as well as the state bear responsibility for the protection of environment.
Complementary to the Environmental Law and its regulations, other laws also govern the protection and conservation of the environment, resources and cultural and natural assets, the prevention and control of pollution, the implementation of measures for the prevention of pollution, health, and safety and labour issues. Some of these laws are:

- Conservation of Cultural and Natural Assets Law (Law No: 2863, Date of Ratification: 1983)
- Energy Efficiency Law (Law No: 5627, Date of Ratification: 2007)
- Forestry Law (Law No: 6831, Date of Ratification: 1956)
- Groundwater Law (Law No: 167, Date of Ratification: 1960)
- Labor Law (Law No: 4857, Date of Ratification: 2003)
- Law on Soil Protection and Land Use (Law No: 5403; Date of Ratification 2005)
- Law on Soil Protection and Land Use (Law No: 6537; Date of Ratification 2014)
- Municipality Law (Law No: 5393, Date of Ratification: 2005)
- Metropolitan Municipality Law (Law No: 5216, Date of Ratification: 2004)
- National Parks Law (Law No: 2873, Date of Ratification: 1983)
- Occupational Health and Safety Law (Law No: 6331, Date of Ratification: 2012)
- Pastures Law (Law No: 4342, Date of Ratification: 1998)
- Public Health Law (Law No: 1593, Date of Ratification: 1930)
- Social Insurances and General Health Insurance Law (Law No: 5510, Date of Ratification: 2006)

2.2 National Environmental Legislation and Regulatory Requirements

Subprojects planned to be financed under Component 1 of FRIT II – Municipal are required to comply with various Turkish environmental regulations in line with the activities being or planned to be conducted within the scope of the proposed subprojects, as well as in implementing related management plans. In line with the Environmental Law and other supplementary laws, several regulations, communiqués and ordinances have been published since 1983. A comprehensive (though non-exhaustive) list of relevant regulations, communiqués and ordinances is given below:

Air Quality Control and Management

- Regulation on the Control of Air Pollution from Heating, Official Gazette date: January 13, 2005, No: 25699.
- Regulation on the Control of Exhaust Emissions, Official Gazette date: March 11, 2017, No: 30004.
- Industrial Air Pollution Control Regulation, Official Gazette date: December 20, 2014, No: 29211.
- Regulation on Assessment and Management of Air Quality, Official Gazette date: June 6, 2008, No: 26898.
- Environmental Management, Permitting and Planning
- Environmental Auditing Regulation, Official Gazette date: November 21, 2008 and No: 27061.
- Environmental Impact Assessment Regulation, Official Gazette date: November 25, 2014 and No: 29186.
- Regulation Concerning Environmental Land Use Plans, Official Gazette date: November 11, 2008 and No: 27051.
- Regulation on Environmental Permit and Licenses, Official Gazette date: September 10, 2014, No: 29115.
• Regulation for Starting up and Operating a Work Place, Official Gazette date: August 10, 2005, No: 25902.

Health and Safety

• First Aid Regulation, Official Gazette date: July 29, 2015, No: 29429.
• Heavy and Hazardous Works Regulation, Official Gazette date: June 16, 2004, No: 25494.
• Regulation on Health and Safety in Fixed Term and Temporary Employment, Official Gazette date August 23, 2013, No: 28744
• Regulation on Health and Safety Measures in the Use of Work Equipment, Official Gazette date: April 25, 2013, No: 28628.
• Regulation on Health and Safety Measures to be taken at Works Involving Chemicals, Official Gazette date: August 12, 2013, No: 28733.
• Regulation on Radiation Safety, Official Gazette date: March 24, 2000, No: 23999.

Management of Chemicals and Other Dangerous Substances

• Regulation Concerning the Classification, Packaging, and Labeling of Dangerous Substances and Preparations, Official Gazette date: December 11, 2013, No: 28848, repeated.
• Regulation Concerning the Material Safety Data Sheets for the Dangerous Substances and Preparations, Official Gazette date: December 3, 2014, No: 29204.
• Regulation on the Inventory and Control of Chemicals, Official Gazette date: December 26, 2008, No: 27092 (repeated).

Nature Protection

• Regulation on Pastures, Official Gazette date: July 31, 1998, No: 23419.
• Regulation on the Protection of Wetlands, Official Gazette date: April 4, 2014, No: 28962.

Noise Control and Management

• Regulation on Procedures and Principles Concerning the Protection of Game and Wild Animals and their Habitats and Combat with their Pests, Official Gazette date: October 24, 2005, No: 25976.
• Noise Control and Management

Soil Quality Control and Management

• Implementation Regulation on Soil Protection and Land Use, Official Gazette date: December 15, 2005, No: 26024.
• Regulation on the Control of Soil Pollution and Polluted Areas by Point Sources, Official Gazette date: June 8, 2010, No: 27605.

Waste Management

• Regulation of Waste Management, Official Gazette date: April 2, 2015, No: 29314.
• Regulation Concerning the Landfill of Wastes, Official Gazette date: March 26, 2010, No: 27533.
• Regulation on the Control of Medical Wastes, Official Gazette date: January 25, 2017, No: 29959.
• Regulation on the Control of Packaging Wastes, Official Gazette date: December 27, 2017, No: 30283.
• Regulation on the Control of Waste Batteries and Accumulators, Official Gazette date: August 31, 2004, No: 25569.
• Regulation on the Control of Waste Oils, Official Gazette date: July 30, 2008, No: 26952.
• Zero Waste Regulation, Official Gazette date: July 12, 2019, No: 30829.
• Regulation on the Control of Waste Tires, Official Gazette date: March 11, 2015, No: 29292.

Water Quality Control and Management

• Ordinance on Groundwater Resources, Official Gazette date: August 8, 1961, No: 10875.
• Regulation Concerning Protection of Ground Waters against Pollution and Deterioration, Official Gazette date: May 22, 2015, No: 29363.
• Regulation Concerning Quality of Surface Waters Planned or Used as Drinking Water Supply, Official Gazette date: June 29, 2012, No: 28338.
• Regulation Concerning Water for Human Consumption, Official Gazette date: March 7, 2013, No: 28580.
• Regulation on the Control of Pollution Caused by Dangerous Substances in Water Environment, Official Gazette date: November 26, 2005, No: 26005.
• Regulation on Pit Opening Where Sewer System Construction is not Applicable, Official Gazette date: March 19, 1971, No: 13783.
• Surface Water Quality Management Regulation, Official Gazette date: April 15, 2015, No: 29327.
• Urban Wastewater Treatment Regulation, Official Gazette date: January 8, 2006, No: 26047.
• Regulation Concerning Wastewater Collection and Disposal Systems, Official Gazette date: January 6, 2017, No: 29940.
• Water Pollution Control Regulation, Official Gazette date: December 31, 2004, No: 25687.

General

• Turkey Building Earthquake Regulation, Official Gazette date: March 18, 2018, No: 30364 (repeated).
• Regulation Concerning the Decrease of Ozone Depleting Substances, Official Gazette date: April 7, 2017, No: 30031.
• Regulation on Control of Large-Scale Industrial Accidents, Official Gazette date: August 18, 2010, No: 27676.

2.3 The Turkish Regulation on EIA

Under Article 10, Environmental Law sets out the general scope of the Environmental Impact Assessment (EIA) procedure in Turkey, indicating that institutions, agencies and establishments that lead to environmental problems as a result of their planned activities are obliged to prepare Environmental Impact Assessment report or Project Information File (PIF). Based on this legal framework, the Regulation on Environmental Impact Assessment (henceforth “EIA Regulation”) was put into force for the first time after being published in the Official Gazette numbered 21489 and dated on February 7, 1993. Since then there had been several amendments in the first regulation and new EIA regulations were published in 2008 and 2013 repealing the former regulations in force. The latest EIA Regulation has been published in the Official Gazette dated November 25, 2014 and numbered 29186, which repealed the 2013 EIA Regulation.

The EIA Regulation is largely in line with the EU Directive on EIA. The key relevant steps of the Turkish EIA procedure namely screening, public consultation, scoping, disclosure and supervision are briefly reviewed below in the order they are prescribed to occur.

2.3.1 Screening

The EIA Regulation classifies projects into two categories:

- **Annex I projects.** These are projects that have significant potential impacts and require an EIA. Annex I of the EIA Regulation lists these projects types, so project proponents are expected to start the EIA procedure without any other screening process; and

- **Annex II projects.** Annex II of the EIA regulation covers the projects that may or may not have significant effects on the environment. Proponents of Annex II projects are required to submit a Project Information File (PIF) to the Ministry of Environment and Urbanization (MoEU). The PIF is prepared following the General Format for PIF provided in Annex IV of the EIA Regulation and contains information on: (i) project characteristics; (ii) environmental characteristics of the project site and impact area; and (iii) significant impacts of the project and measures to be taken during construction and operation phases of the project. A non-technical summary of the above items is also to be added to the PIF. The PIF is submitted to the MoEU for review and evaluation. Provincial Directorate gives its “EIA is Necessary” or “EIA is not necessary” decision regarding the project. The decision of the Provincial Directorate is communicated to public using appropriate means (i.e. announcement boards, internet).

Table 3 provides the list of project types that will be considered for funding under the project and their category per the EIA Regulation. The social impacts within the screening are not compulsory in the national EIA regulation and generally are either very briefly mentioned or not at all.
### TABLE 3. GENERAL PROJECT TYPES AND THEIR CATEGORIZATION (ACCORDING TO TURKISH EIA REGULATION)

<table>
<thead>
<tr>
<th>Investment area</th>
<th>Annex I</th>
<th>Annex II</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water and Wastewater</td>
<td>● WWTPs having a capacity of 150,000 p.e. and/or 30,000 m³/day</td>
<td>● WWTP having a capacity between 50,000 – 150,000 p.e. and/or 10,000 – 30,000 m³/day</td>
</tr>
<tr>
<td>Solid Waste Management</td>
<td>● Except, demolishing and excavated soil disposal areas, Landfill, Recycling or Incineration facilities (thermal processes regarding burning with oxygen, pyrolysis, gasification etc.) receiving ≥ 100 tones/day or with an area of ≥10 ha.</td>
<td>● Except, demolishing and excavated soil disposal areas, Recycling, Composting or Incineration facilities (thermal processes regarding burning with oxygen, pyrolysis, gasification etc.) receiving &lt; 100 tones/day.</td>
</tr>
</tbody>
</table>

Source: Republic of Turkey, Regulation on EIA (Official Gazette No. 29186, November 25, 2014)

2.3.2 Public consultation

For projects that require the preparation of an EIA, the Governorate is required to inform the public that a project application has been submitted in a specified locality, that the EIA process has begun and that the public may submit its comments and suggestions to the Governorate or MoEU. The announcement is made using a variety of methods, including the internet, bulletin boards and loudspeaker announcements. MoEU informs the public of the same through the internet.

A formal public consultation meeting occurs for projects that are subject to an EIA after the screening process and prior to scoping. The project proponent organizes a “public participation meeting” chaired by MoEU provincial director in a location that affected local groups can access easily. The invitation to the meeting is published in a national and a local newspaper at least ten days prior to the meeting. There is no requirement that information on the project should be provided to the public in advance, except for the subject matter of the meeting. However, the EIA Regulation specifies that during the meeting, which is chaired by the Director or a member of MoEU’s provincial directorate, it should be ensured that the public is informed about the project, and its comments and suggestions regarding the project are obtained. The meeting chairperson may request comments in writing too. Minutes of the meeting are kept and submitted to MoEU and the Governorate. The Governorate is required to inform the public about the timeframe for submission of public comments and suggestions. Such comments and suggestions are submitted to the EIA commission.

2.3.3 Scoping

The project proponent presents a project dossier (PIF for Annex II projects or using the outline given in Annex III of the EIA regulation for Annex I projects) to a commission, which comprises representatives of MoEU and relevant organizations as identified by MoEU. Based on the information submitted, the commission determines the scope of the EIA and the “project specific format”. Furthermore, the commission may exclude or include some items depending on the specific characteristics of the proposed project. The commission also determines the level of detail under each heading depending on the special project’s environmental impacts. In this process, the commission takes into consideration of the opinions expressed during the public participation meeting.
2.3.4 Review and approval of the EIA report

As mentioned previously, the commission revises the draft version of the EIA report. In its review, the commission assesses (i) the adequacy of the EIA report and its annexes; (ii) whether the analyses, evaluations or calculations were adequately substantiated by relevant data and documentation; (iii) whether the potential environmental impacts of the project were evaluated in adequate scope and depth; (iv) whether measures necessary to prevent or mitigate negative environmental impacts have been identified; (v) whether the public participation meeting was carried out in accordance with prescribed procedures and the issues brought up during the meeting were adequately addressed in the report. While the EIA identifies a project’s environmental impacts and mitigation measures, it does not specify costs and institutional responsibilities associated with these mitigation measures. Neither does the EIA include a monitoring plan.

The final EIA report, which incorporates the commission’s assessments, is then submitted to the MoEU for final review. MoEU determines whether the “EIA is positive” in which case the project proponent may implement the project or “EIA is negative” in which case the project may not go any forward.

2.3.5 Disclosure

The draft EIA report is made available to the public for comments at Central MoEU or provincial directorate. After MoEU’s final evaluation of the EIA report, the Governorate announces to the public MoEU’s decision together with its justifications. Disclosure of the final EIA document is not foreseen in the EIA Regulation.

2.3.6 Monitoring and inspection

According to the EIA Regulation, MoEU monitors and inspects projects that were assessed either “EIA is not necessary” or “to have a positive EIA” based on provisions specified in the PIF or the EIA, respectively. Furthermore, the project proponent is obliged to submit project progress reports to MoEU. In case MoEU determines non-compliance, the Governorate issues a warning. If after the granted time compliance is still not achieved the Governorate may suspend the operation of the plant in question.

2.4 National Laws on Social Impacts

Although the Turkish EIA Regulation does not entirely meet the requirements of international standards in terms of social impacts and stakeholder engagement, there are some legal arrangements for managing various social impacts. In this respect, the following are identified to be a non-exhaustive list of social legal framework applicable for this project:

- Labor Law (No. 4857), published in the Official Gazette no. 25134 dated 10 June 2003
- Law on Occupational Health and Safety (No. 6331), published in the Official Gazette no. 28339 dated 30 June 2012
- Regulation on Contractors and Sub-contractors, published in the Official Gazette no. 27010 dated 27 September 2008
- Laws on Right to Information (No. 4982), published in the Official Gazette no 25269 dated 24 October 2003
- Regulation on the Environmental Impact Assessment (EIA) published in the official Gazette no. 29186 dated 2525 November 20142014.

In terms of land acquisition and involuntary resettlement, the relevant legal arrangements of Turkey are summarized below:
2.4.1 National Laws on Labor and Working Conditions

Occupational Health and Safety

In recent years, Turkey has undergone a reform to improve its national Occupational Health and Safety (OHS) system through adapting a set of international and regional standards into its national level requirements for the prevention occupational risks as defined in the ILO Occupational Safety and Health Convention, 1981 (No. 155). The convention, along with the Occupational Health Services Convention, 1985 (No. 161) were both ratified by Turkey in 2005 who Turkey is also party to the Labor Inspection Convention, 1945 (No. 81) since 1951. In 2014, Turkey ratified the Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187).

During 2012, a stand-alone Law on OHS (No. 6331) was put into force (20 June 2012). The OHS Law governs workplace environments and industries (both public and private) as well as virtually all classes of employees including part-time workers, interns, and apprentices. The legislation is comprehensive and is generally applicable across all sectors and many industries.

Labor and Working Conditions

Turkey is party to a multitude of ILO conventions, including but not limited to conventions on: equal treatment of employees, gender equality, child labor, forced labor, OHS, right of association and minimum wage. Accordingly, the current Turkish Labor Law (No.4857) is to large extent consistent with ESS2 requirements.

There are also secondary legislation that may apply to the project which include regulations on annual leave, working hours, overtime work, minimum wage, female and child employees. The Ministry of Family Labor and Social Services has published various communiques and circulars that set ground for the implementation of the Labor Law which may also be referenced during project implementation.

2.4.2 National Laws on Land Acquisition

In the scope of the Turkish legal framework, land acquisition/expropriation related issues are handled through the Expropriation Law No: 2942 (amended by Law No: 4650 in 2001).

Compensation for the subject property/assets to be expropriated is determined according to procedures and principles outlined in Articles 8, 10 and 11 of the Law. Article 27 authorizes the expropriation agency to confiscate the assets required by the project earlier than the time needed in normal expropriation procedure. This process does not prevent challenges of the property owners against the determined valuation.

2.5 International Agreements and Conventions

Turkish national policy on protection of environment, cultural heritage and conservation of biological resources has been formulated on the basis of relevant international agreements signed or ratified by Turkey. Relevant environmental, OHS and international labor agreements and conventions ratified by Turkey are listed below:
• Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal
• Bern Convention on Protection of Europe’s Wild Life and Living Environment
• Convention on International Trade in Endangered Species of Wild Flora and Fauna (CITES)
• Convention on Long-range Transboundary Air Pollution
• European Convention on the Protection of the Archaeological Heritage
• European Landscape Convention
• International Convention for the Protection of Birds
• Montreal Protocol on Substances that Deplete the Ozone Layer
• Paris Convention on the Protection of the World Cultural and Natural Heritage
• Ramsar Convention on Wetlands of International Importance Especially as Wildfowl Habitat
• Stockholm Convention on Persistent Organic Pollutants
• United Nations Convention to Combat Desertification in Countries Experiencing Serious Drought and/or Desertification, Particularly in Africa
• United Nations (UN) Framework Convention on Climate Change (Kyoto Protocol)
• UN (Rio) Convention on Biological Diversity
• Vienna Convention or the Protection of the Ozone Layer
• ILO Occupational Safety and Health Convention
• Occupational Health Services Convention
• Labor Inspection Convention
• Promotional Framework for Occupational Safety and Health Convention
• Worst Forms of Child Labor Convention

2.6 World Bank’s Environmental and Social Standards

The WB Environmental and Social Standards (ESSs) set the requirements to be met by Borrowers with respect to the identification, evaluation and mitigation of social and environmental risks and impacts associated with projects supported by the Bank through Investment Project Financing. Nine (as ESS 7 is not relevant) out of the ten ESSs establish the standards that the Borrower and the project will meet through the project life cycle, as follows:

• ESS1: Assessment and Management of Environmental and Social Risks and Impacts;
• ESS2: Labor and Working Conditions;
• ESS3: Resource Efficiency and Pollution Prevention and Management;
• ESS4: Community Health and Safety;
• ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement;
• ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;
• ESS8: Cultural Heritage;
• ESS9: Financial Intermediaries; and
• ESS10: Stakeholder Engagement and Information Disclosure.

In accordance with the ESSs, the World Bank Group’s Environment, Health and Safety (EHS) Guidelines should be apply to the project. Therefore, this project will apply the relevant requirements of the EHS Guidelines. In cases where the Turkish requirements differ from the levels and measures presented in the EHS Guidelines, the more stringent one (such as the most stringent discharge and emission standards) will be applied in the project specifications.

The applicable EHS Guidelines for this project are as follows:

• World Bank Group’s EHS General Guidelines;
- World Bank Group’s EHS Guidelines for Water and Sanitation; and
- World Bank Group’s EHS Guidelines for Waste Management Facilities.

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

The World Bank requires assessment, management and monitoring of environmental and social risks and impacts of projects supported by the Bank to ensure that projects are environmentally and socially sound and sustainable. The objectives of ESS1 are: (i) to identify, evaluate and manage the environmental and social risks and impacts of the project in a manner consistent with ESSs; (ii) to adopt mitigation hierarchy approach to (a) anticipate and avoid risks and impacts, (b) where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels, (c) once risks and impacts have been minimized or reduced, mitigate, and (iv) where significant residual impacts remain, compensate for or offset them, where technically and financially feasible, (iii) to adopt differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable, and they are not disadvantaged in sharing development benefits and opportunities resulting from the project, (iv) to utilize national environmental and social institutions, systems, laws, regulations and procedures in the assessment, development and implementation of projects whenever appropriate, and (v) to promote improved environmental and social performance in ways which recognize and enhance Borrower capacity.

As per requirements of ESS1, the Borrower will: (i) conduct an environmental and social assessment of the proposed subprojects; (ii) undertake stakeholder engagement and disclose appropriate information in accordance with ESS10; (iii) develop an Environmental and Social Commitment Plan (ESCP), and implement all measures and actions set out in the legal arrangement including the ESCP; and (iv) conduct monitoring and reporting on the environmental and social performance of the project against the ESSs.

2.6.2 **ESS2 Labor and Working Conditions**

The objectives of ESS2 are: (i) promote safety and health at work; (ii) promote the fair treatment, non discrimination and equal opportunity of project workers; (iii) protect workers including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with ESS2) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate; (iv) prevent the use of all forms of forced labor and child labor (v) support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law; and (vi) provide project workers with accessible means to raise workplace concerns. The applicability and scope of application of ESS2 depends on the environmental and social assessment described in ESS1 and the type of employment relationship between the Borrower and the project workers.

ESS2 requirements cover; the development and implementation of written labor management procedures which will be applicable to the project. These procedures will set out the way in which project workers will be managed, in accordance with the requirements of national law and this ESS, and will include the description of the following: (i) working conditions and management of worker relationships (such as development and implementation of labor management procedures applicable to the project) including terms and conditions of employment, nondiscrimination and equal opportunity, and worker’s organizations; (ii) protecting the work force including defining a minimum age for workers, prohibition of child labor and forced labor; (iii) grievance mechanism (for the workers); (iv) occupational health and safety; (v) contracted workers; (vi) community workers; and (vii) primary supply workers.
2.6.3 ESS3 Resource Efficiency and Pollution Prevention and Management

The objectives of ESS3 is to: (i) promote the sustainable use of resources, including energy, water and raw materials; (ii) avoid or minimize adverse impacts on human health and the environment by avoiding minimizing pollution from project activities; (iii) avoid or minimize project related emissions of short and long-lived climate pollutants; (iv) avoid or minimize generation of hazardous and non-hazardous waste; and (v) minimize and manage the risks and impacts associated with pesticide use. The applicability of ESS3 depends on the environmental and social assessment described in ESS1.

ESS3 requirements cover: (i) resource efficiency including energy, water and raw material use; and (ii) pollution prevention and management including management of air pollution, hazardous and non-hazardous wastes, chemicals and hazardous materials, and pesticides.

2.6.4 ESS4 Community Health and Safety

ESS4 addresses potential health, safety, and security risks and impacts on project-affected communities and corresponding responsibility of Borrowers to avoid or minimize these, with particular attention to vulnerable people. The objectives of ESS4 is to: (i) anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life cycle from both routine and nonroutine circumstances; (ii) promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams; (iii) avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials; (iv) have in place effective measures to address emergency events; and (v) ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities. The applicability of ESS4 depends on the environmental and social assessment described in ESS1.

ESS4 requirements cover: (i) community health and safety including infrastructure and equipment design and safety (including safety of dams), safety of services, traffic and road safety, ecosystem services, community exposure to health issues, management and safety of hazardous materials, and emergency preparedness and response; and (ii) security personnel.

2.6.5 ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The objectives of ESS5 is to: (i) avoid involuntary resettlement or, when unavoidable, minimize involuntary resettlement by exploring project design alternatives; (ii) avoid forced eviction; (iii) mitigate unavoidable adverse social and economic impacts from land acquisition or restrictions on land use by: (a) providing timely compensation for loss of assets at replacement costs and (b) assisting displaced persons in their efforts to improve, or at least restore, their livelihoods and living standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher; (iv) improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure; (v) conceive and execute resettlement activities as sustainable development programs, providing sufficient investment resources to enable displaced persons to benefit directly from the project, as the nature of the project may warrant; and (vi) ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and the informed participation of those affected. The applicability of ESS5 depends on the environmental and social assessment described in ESS1, and applies to permanent or temporary physical and economic displacement resulting from the types of land acquisition or restrictions on land use undertaken or imposed in connection with project implementation described in ESS5.
ESS5 requirements cover the preparation and implementation of a resettlement framework or plan which will set ground for: (i) general requirements such as eligibility classification, project design, compensation and benefits for affected persons, community engagement, grievance mechanism, planning and implementation; (ii) physical and economic displacement; (iii) collaboration with other responsible agencies or subnational jurisdictions; and (iv) technical and financial assistance.

2.6.6 **ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources**

The objectives of ESS6 is to: (i) protect and conserve biodiversity and habitats; (ii) apply the mitigation hierarchy and the precautionary approach in the design and implementation of projects that could have an impact on biodiversity; (iii) promote the sustainable management of living natural resources; and (iv) support livelihoods of local communities including Indigenous Peoples, through the adoption of practices that integrate conservation needs and development priorities. The applicability of ESS6 depends on the environmental and social assessment described in ESS1.

ESS6 requirements cover: (i) general requirements including assessment of risks and impacts, conservation of biodiversity and habitats (modified, natural, and critical habitats), legally protected and internationally recognized areas of high biodiversity value, invasive alien species, and sustainable management of living natural resources; and (ii) primary suppliers.

2.6.7 **ESS8 Cultural Heritage**

ESS8 sets out general provisions on risks and impacts to cultural heritage from project activities. The objectives of ESS8 is to: (i) protect cultural heritage from the adverse impacts of project activities and support its preservation; (ii) address cultural heritage as an integral aspect of sustainable development; (iii) promote meaningful consultation with stakeholders regarding cultural heritage; and (iv) promote the equitable sharing of benefits from the use of cultural heritage. The applicability of ESS8 depends on the environmental and social assessment described in ESS1.

ESS8 requirements cover: (i) general requirements, (ii) stakeholder consultation and identification of cultural heritage including confidentiality and stakeholders’ access; (iii) legally protected cultural heritage areas; (iv) provisions for specific types of cultural heritage including archaeological sites and material, built heritage, natural features with cultural significance, and movable cultural heritage; and (v) commercial use of cultural heritage.

2.6.8 **ESS9 Financial Intermediary**

Financial Intermediaries (FIs) are required to monitor and manage environmental and social risks and impacts of the projects they finance. The objectives of ESS9 is to: (i) set out how the FI will assess and manage environmental and social risks and impacts associated with the subprojects it finances; (ii) promote good environmental and social management practices in the subprojects the FI finances; and (iii) promote good environmental and sound human resources management within the FI. ESS9 applies to FIs that receive financial support from the Bank including public and private financial services providers.

ESS9 requirements cover: (i) environmental and social management system including environmental and social policy, environmental and social procedures, organizational capacity and competency, and monitoring and reporting; and (ii) stakeholder engagement.
2.6.9 ESS10 Stakeholder Engagement and Information Disclosure

Open and transparent engagement between the Borrower and project stakeholders is one of the essential elements of good international practice and effective stakeholder engagement improves the environmental and social sustainability of projects. The objectives of ESS10 is to: (i) establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties; (ii) assess the level of stakeholder interest and support for the project and to enable stakeholders’ views to be taken into account in project design and environmental and social performance; (iii) promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them; (iv) ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format; and (v) provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances. ESS10 applies to all projects supported by the Bank through Investment Project Financing.

ESS10 requirements cover the development of a stakeholder engagement framework and/or plan that will define the following: (i) engagement during project preparation including stakeholder identification and analysis, stakeholder engagement plan, information disclosure, and meaningful consultation; (ii) engagement during project implementation and external reporting; (iii) grievance mechanism; and (iv) organizational capacity and commitment.

2.6.10 World Bank Safeguards Policies

After enactment of the ESF, environmental and social safeguard policies of the World Bank got abolished, but some remained in force. One of them is OP 7.50 - Projects on International Waterways. It describes the types of waterways and projects that the policy applies, and the requirements and conditions of financing projects on international waterways. With regard to OP 7.50, ILBANK is responsible for ensuring that the subprojects financed are located and dependent on national waterways only. The waterways identified as NOT being international waterway (do not trigger OP 7.50) in Turkey are the following: Susurluk, North Aegean, Gediz, Kucuk Menderes, Buyuk Menderes, Western Mediterranean, Antalya, Sakarya, Western Black Sea, Yesilirmak, Kizilirmak, Konya Kapali, Eastern Mediterranean, Seyhan, Ceyhan, Eastern Black Sea, Burdur, Afyon, Orta Anadolu and Van.

2.7 Key Differences Between the Turkish EIA Regulation and the WB ESSs

The Turkish EIA procedures are, with some exceptions, in line with the WB’s ESSs. The primary exceptions are in project categorization, scope of environmental and social assessment, and public consultation. In cases where the Turkish legislation differ from the ESSs, the more stringent one will be applied to the project implementation.

Project categorization

According to the World Bank’s E&S Policy, projects (including projects involving FIs) are classified into one of four classifications as **High Risk, Substantial Risk, Moderate Risk** or **Low Risk** taking into account relevant potential risks and impacts, such as the type, location, sensitivity and scale of the project; the nature and magnitude of the potential E&S risks and impacts; the capacity and commitment of the Borrower; and other areas of risks that may be relevant to the delivery of E&S mitigation measures and outcomes (see Annex 1 for details).
There are no clear-cut border values distinguishing the classification of the projects or, unlike the Turkish EIA Regulation (where projects are classified into two categories as Annex I and Annex II projects), any ready lists of project types for classification; rather projects are screened on a case by case basis in the environmental and social risk classification of the WB.

Scope of Environmental and Social Assessment

The scope and type of E&S assessment required as per ESS1 varies proportionate to the potential risks and impacts of the project and, in an integrated way, all relevant direct, indirect and cumulative environmental and social risks and impacts throughout the project life cycle, as per the ESSs 2-10, are assessed.

Indicative outlines of ESIA report and ESMP are given in Annex 2.

Comparison of the indicative outline required by the WB for ESIA with the general format of a Turkish EIA indicates a number of key differences as follows:

- the absence of an executive summary and information on the legal and institutional framework in the Turkish EIA (Technical level of information in the non-technical summary required in the Turkish EIA may not meet WB requirements);
- possible discrepancies with regard to the level at which the project’s environmental and social impacts, its alternatives, and mitigation measures for the impacts are discussed (such as lack of discussions on residual impacts, limited discussion on indirect and induced impacts, limited assessment regarding use of resources and GHG emissions);
- social impact assessment is not completely integrated to the Turkish EIA and this results in the absence of proper social baseline, identification and assessment of the project induced social impacts including impacts on disadvantaged or vulnerable and gender related issues;
- there are limited requirement to cover risks and impacts related to (i) community health and safety; (ii) occupational health and safety; and (iii) labor and working conditions;
- limited or no requirement to cover cumulative impacts with other projects in the Turkish EIA; and
- limited emphasis on the associated facility in the Turkish EIA.

Nevertheless, the project specific format for Turkish EIA may require more details under some of these headings than indicated in the general format. Consequently, a case by case review of the Turkish EIAs is necessary to identify gaps with WB requirements.

Public consultation and disclosure

Pursuant to ESS 1, stakeholder engagement is an integral part of E&S assessment and should be conducted in accordance with ESS 10. Within this scope, the Borrowers should identify the different stakeholders (project-affected parties and other interested parties including disadvantaged or vulnerable), and develop and implement a Stakeholder Engagement Plan (SEP), in consultation with the Bank, proportionate to the nature and scale of the project and its potential risks and impacts. SEP should describe the timing and methods of engagement with stakeholders throughout the life cycle of the project, and also describe the range and timing of information to be communicated to the parties as well as type of information to be sought from them. The Borrower should disclose project information to allow stakeholders to understand the risks and impacts of the project, and potential opportunities, in a timeframe that enables meaningful consultations with the stakeholders on project design.
The Turkish EIA Regulation requires “pre-scoping” public consultation only for projects requiring an EIA, and only requires announcement of the environmental assessment together with the justification. However, ESS 10 does not specify an exact number and method of public consultation and information disclosure but instead the standard requires a continuous stakeholder engagement approach through the life cycle of the project that will be decided proportionate to the nature, scale and impact magnitude of the project.

2.8 Environmental and Social Risk Classification and Application of ESSs to Subprojects

2.8.1 Overall Risk Assessment

The overall project risk is rated as “Substantial”. One of the key risks is stakeholder risk, which is rated as substantial. This reflects past history where municipalities/utilities have withdrawn from similar projects either immediately before negotiations or subsequent to loan signing due to internal political and financial considerations. To mitigate this risk, municipalities/utilities are required to provide Municipal Executive Board/Utility Executive Board Decisions in support of their participation in the project and are also required to prepare feasibility studies that include a financial assessment of the subproject and the municipality. The risk rating also reflects possible community resistance to certain investments. To mitigate this risk, ESIAs and/or ESMPs will be prepared for each subproject investment and a grievance redress mechanism will be set up within the project. The sub-projects to be financed under the Project will be designed so that they will benefit both host communities and refugee populations of a given area. And the Stakeholder Engagement Plan (SEP) for each sub-project will clearly communicate this balanced benefit-sharing to both population groups. In addition, other citizen engagement mechanisms will also be explored during the preparation period.

2.8.2 Environmental Risk Classification

The environmental risk has been downgraded to Substantial following the Concept stage after site visits carried out by Bank team. It is not expected that sub-projects will have significant adverse effects to human health and/or the environment and that the project will not result in significant adverse cumulative or transboundary impacts. Moreover, the areas likely to be affected by the project are not of high value and sensitivity. Component 1 of the project consists of 15 environmental infrastructure investments (sub-projects) in 5 targeted municipalities at appraisal stage. The 8 water supply sub-projects will include the construction of a water treatment plant, construction of new and extension of existing water distribution networks and transmission lines, expansion of water reservoir capacities, and NRW reduction activities such as installation of SCADA systems and development of water metering areas. The 6 wastewater investments will include construction of new WWTPs or expansion of their capacity as well as construction of new and extension of existing sewerage collection networks. Investments in solid waste facilities will include provision of the new waste collection and transfer equipment and construction of two transfer stations and a landfill (including composting and mechanical separation facilities) in Afsin District of Kahramanmaras, and rehabilitation or closure of existing dumpsites. Overall, the project will finance a variety of sub-projects carrying moderate or substantial environmental risks which may materialize both at the construction and operation phases. The potential environmental risks associated with the construction and operation of WWTPs and solid waste landfills include: (i) generation of noise, dust, wastewater, excess material and other waste in the construction phase, (ii) emission of dust, bio-aerosols, odors, and vehicle exhaust during waste collection and transportation, (iii) contaminated runoff, leachate generation and landfill gas emissions; groundwater contamination, (iv) noise and vibration from the operation of waste processing equipment, (v) fire and explosion risks due to landfill gas, (vi) community health and safety impacts such as visual, dust and odor problems as well as scavenging related impacts and physical, chemical and biological hazards (vi)
occupational health and safety impacts such as accidents and injuries, chemical exposure, noise and vibration exposure and exposure to pathogens and vectors, (vii) closure and post-closure management of the landfills, (viii) discharge of treated wastewater to receiving bodies, (ix) sludge and solids generation from wastewater treatment plants, (x) emissions of hydrogen sulfide, methane, ozone, gaseous or volatile chemicals associated with WWTPs and (xi) ecological impacts on the nearby receptors. Although the Ilbank - the project implementing entity - has extensive experience in applying the Bank’s safeguard policies under MSP 1 and 2 and SCP 1 and 2, it lacks experience in managing complex and high-risk projects in Fragility-Conflict-Violence (FCV) contexts.

2.8.3 Social Risk Classification

The social risk has been downgraded to Substantial following the Concept stage. The project will have overall positive social impacts on improving municipal infrastructure in provinces known to host the largest numbers of refugees in urban settlements. Social risks and impacts intrinsic to the project are comparable to other municipal investment carried out under the Bank financed Sustainable Cities Projects 1 and 2 with Ilbank which are assessed Moderate. Contextual risks are rated Substantial because the sub projects to be financed under the project are designed to benefit a broad population regardless of nationality or any vulnerability, which is considered to allow management of contextual risks which may otherwise be High.

Risks related to the capacity of implementation agency (Ilbank) is Substantial because Ilbank will be applying ESF for the first time. The majority of the sub-projects requiring land have already completed acquisition works, however, designs currently under revision may well change the project footprint and thus the scope of land acquisition. Ex-post social audits will identify gaps or deficits that need to be addressed in light of the ESS5, which will be filled before implementation of relevant sub projects start. Although initial screening studies indicated that there are no organized waste-picking activities taking place in the wild dumpsites that will be rehabilitated under one pre-identified sub-project, there may still be ad-hoc waste-picking activities with livelihood impact, which will only be verified during site specific E&S studies to be undertaken during implementation.

In project borrowing municipalities, no community unrest has been reported over access to services following the influx of Syrian refugees. However, borrowing municipalities and utilities will pay utmost attention to potential social tensions by timely and relevant implementation of SEPs prepared for the Project and information disclosure, engaging stakeholders across host and refugee communities in the project areas.

Residual social risks following the integration of risk mitigation measures in the project design and additional measures provided through various ESF instruments are considered to be Substantial.

2.8.4 Application of the ESSs to Subprojects

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

The project will include environmental infrastructure investments devoted to the delivery of utility services, such as water supply, sanitation, and solid waste management. These investments will primarily have positive environmental impacts but specific subprojects are also expected to have some significant environmental and social risks. The risks are related to both construction and operation phases of the investments.

The construction-related impacts are habitat disturbance, air and noise emissions, community health and safety (including traffic management related risks and gender-based violence risks),
occupational health and safety risks, labor influx, land acquisition, loss of livelihoods, etc. There is also a risk of adverse impacts on culturally or naturally sensitive areas.

Operation phase impacts are generation and discharge of treated wastewater, generation and disposal of leachate and landfill gases, odor generation from wastewater treatment plants and landfill, etc.

Although the subprojects are identified at this stage and preliminary feasibilities/designs are being reviewed, there is a possibility of a change in the project list during preparation and implementation, and hence this project is processed as a framework project. For this purpose, relevant environmental and social issues associated with the construction and operation of each type of subproject has been elaborated in the ESMF and RF documents of the project. Site-specific issues/impacts will be determined by ILBANK during the screening process, as described in this ESMF. In addition, ILBANK will prepare a Land Acquisition and Resettlement Policy Framework, Labor Management Procedures to include application of ESS 2 to ILBANK employees and application to contracted workers, a Stakeholder Engagement Framework (as annex to this ESMF). An Environmental and Social Commitment Plan will also be prepared.

For all subprojects, site specific environmental and social assessment documents (e.g. ESIAs/ESMPs, RP/Ex-Post Social Audit) will be prepared and the completion of these documents will be finalized during implementation. It will be required that all site specific environmental and social assessment documents will be finalized, approved by the Bank and disclosed before the respective bidding processes of each subproject. Municipalities will produce these documents according to the environmental and social risk categorization of the subprojects. During subproject E&S document preparation, the WBG EHS General Guidelines as well as Waste Management Facilities, Water and Sanitation guidelines will be used in addition to the national legislation requirements. The most stringent discharge and emission standards will be applied in project specifications.

Social impacts and risks will be assessed in details at the subproject level in these environmental and social documents during implementation. These may include involuntary land take, potential non-land income losses, labor influx and SEA risks, community health and safety, impacts on cultural assets and heritage, vulnerable groups, stakeholder relations and social cohesion risks. Positive social impact anticipated include local employment and procurement opportunities, social welfare impacts as a result of improved access to municipal services. Vulnerable and disadvantaged groups (such as elderly, illiterate, people unable to understand host language, women, disabled etc.) will be identified through the ESIAs, RPs/Ex-Post Social Audits. The project is also expected to contribute to maintaining social cohesion between host communities and Syrian refugee communities by ensuring that the project would benefit both communities and informing them accordingly. Additionally, local NGOs/CSOs, community leaders, and local government representatives residing or working in the project areas will also be considered as stakeholders.

Associated facilities (such as tunnels that are a part of Yedigoze Drinking Water Transmission Line but construction of these will be financed by ASKI) will be taken into account in the site specific E&S assessments, as applicable, as well as cumulative impacts.

**ESS2 Labor and Working Conditions**

Project workers include the direct workers, contracted workers and primary supply workers. ILBANK PMU employees are civil servants and direct employees of this project. Contractors engaged in civil works are contracted workers. Primary supply workers will be determined under ES studies of the subprojects. ILBANK will prepare Labor Management Procedure
(LMP), which will include requirements for different categories of workers including contracted workers.

During project implementation, when bidding for civil works will take place, LMP will be attached to bidding documents. Awarded contractors will then adopt project LMP (including Code of Conduct). Main contractors will be responsible to manage their subcontractors.

LMP will set out the basic procedures and requirements to be implemented by ILBANK to ensure that ILBANK and its Project Partners and Contractors respect and protect the fundamental principles and rights of workers through promoting a decent work place. This includes:

- fair treatment;
- non-discrimination and equal opportunities of workers;
- establishing, maintaining and improving a sound worker-management relationship;
- compliance with national labour and employment laws; code of conduct
- protecting and promoting the safety and health of workers, especially by promoting safe and healthy working conditions;
- preventing the use of forced labour and child labour (as defined by the WB and Turkish legislation)
- Induction training for employees regarding to code of conduct, HSE and WB requirements etc.

The LMP will help all parties and contractors to ensure they meet the requirements set out in Tender documentation for managing employment. GRM for all project workers are explained in detail under Section 6.

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

Feasibility studies of the subprojects will be assessed in detail during the project preparation stage to determine the ESS3 aspects of subprojects. The discharge locations for the wastewater treatment facilities will also be reviewed with regards to identification of appropriate discharge standards. But it is mandatory that the effluent quality of treated wastewater will be in line with Turkish legislation (adopted from EU Directives) and WBG’s EHS Guidelines.

Leachate and landfill gas management, assimilative capacity of receiving environments, sludge management, odor, noise, air quality aspects will be evaluated in details in the subproject specific E&S documents. Leachate management is also critical for conservation of groundwater quality and national and WBG’s EHS guidelines will be applied.

GHG emissions will arise from the construction works but this will be limited spatially and quantitatively. More significant GHG can arise from the landfill gasses and wastewater sludge generation, however, with proper technologies the GHGs can be collected and managed in the most efficient way and also can be used as an energy generating resource. The alternatives for sludge and landfill gas management will be discussed in the subproject specific E&S assessments.

Energy and resource efficient equipment such as water pumps, WWTP units, pipes, valves, etc. will be preferred during the project design studies.

**ESS4 Community Health and Safety**
Ground water monitoring against potential pollution due to leachate seepage is a critical issue and proper mitigation and monitoring arrangements will be discussed in the subproject specific E&S documents.

The proposed subprojects will be located in semi-urban areas and urban areas (for water and wastewater network systems). Traffic will be a major issue due to transportation of solid waste to the landfill and also of the treatment sludge from WWTP to disposal facilities. The construction sites for all subprojects will be surrounded with appropriate fencing for avoiding nearby population's entrance to the project sites. Traffic management plans should be prepared for all the subprojects and should be integrated into the E&S documents.

Nearby communities and settlements will be informed in a timely manner of the construction activities and their implications prior to any activity. Specific measures related to site integrity against floods, landslides, earthquakes, will be integrated into the site specific ESMPs.

Livelihood patterns and living conditions of the nearby communities including waste pickers will be investigated during subproject ESIs/ESMPs to develop proper measures in daily routines and avoiding health and safety issues that may be caused by subprojects.

The cumulative impacts related to community health and safety arising from construction phases of several municipal infrastructure projects (or similar public goods projects) will be assessed in the subproject specific ESIs/ESMPs. The potential adverse impacts of labor influx and sexual exploitation and abuse (SEA) risks will also be considered among the social issues in the ESIs and ESMPs, as per WB requirements.

Emergency preparedness and response plans for the sub-projects will be prepared as a part of site-specific E&S documents.

One sub-project in Adana includes the 34 km long Kozan Imamoglu Yedigöze Drinking Water Transmission Line which will be fed by the Yedigöze reservoir on the Yedigöze dam/hydropower plant. The World Bank Dam Safety Expert conducted a due diligence on dam safety aspects for Yedigöze dam as part of project preparation. The Bank expert's general impression was positive, with both the operator and the state supervisory authority aware of the importance of the safety and the maintenance of its facilities. The assessment will be completed after the relevant documents are shared with and reviewed by the World Bank.

**ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

Land acquisition requirements of the subprojects are mostly known and provided in the project RF. According to available data, a few of the subprojects requiring land acquisition, the process has either started or is about to be completed. In such cases, Ex-Post Social Audits will be carried out after detailed designs become ready but before construction works start in order to determine any gaps that may exist vis-à-vis ESS 5 in terms of the process and outcomes. For sub-projects that may require alterations in final design, the RF will serve as a guiding document in how to address land based impacts and compensation measures. Should there be any non-land based livelihood losses, those impacts will be addressed under the requirements of ESS1 under the sub-project specific ESIA/ESMPs. Relevant land based social impacts associated with the construction and operation phase of each sub-project and corresponding entitlement and mitigation measures have been elaborated in the RF produced by ILBANK and approved by the World Bank. The RF also details the institutional implementation/monitoring arrangements between ILBANK and the borrowing municipalities.

The subprojects are likely to have temporary (for network pipelines) and/or permanent land acquisition (for treatment plants and landfill). ILBANK and borrowing municipalities in previous projects make efforts to utilize public lands and existing roads for their investments.
requiring land. In cases where public lands are not available, land acquisition will be kept to a minimum during project design. Where land take is inevitable, ILBANK will ensure that borrowing municipalities compensate for the loss at replacement cost, in compliance with Bank standards. While physical displacement will be avoided in all subprojects, economic displacement is likely to happen. Entitlement matrix regarding economic displacement has been formulated in the RF and will be used in the subproject specific RPs and Ex-Post Social Audits. The solid waste landfill may encounter informal waste pickers, which will be assessed during project preparation. If the case, measures to livelihood losses will be addressed in ESMP.

ILBANK and the relevant municipalities are responsible for determining site-specific impacts, yet RPs/Ex-Post Social Audits will be prepared, implemented and monitored by the municipalities. ILBANK will provide close support to municipalities during RP/Ex-Post Social Audit preparation and will supervise the implementation of RPs. Generally water and sewage network projects tend to follow public roads and are in their right-of-way, which minimizes both physical and economic displacement. Every sub-project specific RP and Ex-Post Social Audit prepared by Municipalities will be reviewed by ILBANK and sent to the World Bank for no-objection.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

Subproject sites will be assessed by considering the Key Biodiversity Areas (KBAs), Important Bird Area (IBA), nationally protected areas, critical habitats, and IUCN lists. The first preference will be to avoid all types of sensitive habitats. The site-specific E&S document will include a detailed analysis of flora & fauna species, habitats and the significance of impacts on those. If any of the subprojects have significant impacts on biodiversity values, a separate biodiversity management plan, including mitigation and monitoring measures will be prepared. The feasibility studies of the identified subprojects will be evaluated by ILBANK and existence of critical natural habitats, natural habitats and modified habitats will be determined (according to the definitions of ESS6). World Bank specialists will also provide support to ILBANK in drafting the TORs for the ESIAs and Biodiversity Management Plans (if needed).

ESS8 Cultural Heritage

There are no known cultural heritage sites in the sub-project areas. However, as the project involves large-scale construction works in 5 selected municipalities, there is a risk of chance finds during excavation works. Therefore, the subproject-specific E&S documents will need to include chance find procedures at a minimum, and these should be included in civil works contracts.

ESS9 Financial Intermediaries

The project will be implemented by ILBANK – the Financial Intermediary, and it will transfer the funds received from EU IPA and IBRD to clearly identified subprojects of targeted municipalities. As an affiliate to the Ministry of Environment and Urbanization, ILBANK is subject to Turkish national laws and regulations. Therefore, it is responsible for the application of various law and regulations including Environment Law, Expropriation Law, Resettlement Law etc. for the subprojects it finances or signs sub-loan agreements. Credit evaluation process of ILBANK includes technical, economic and financial assessment of subject loans. However, there is no specific environmental and social assessment criteria defined in the scope of technical assessment.

Projects that ILBANK finances through international financing such as WB, EIB, and JICA are handled by International Affairs department which utilizes key procedural documents for internationally financed investments. The key procedural documents managing the project’s
environmental and social screening, review and monitoring procedures for subprojects are the ESMF and RF which will be implemented throughout the lifetime of the projects. ILBANK signs sub-loan agreements with the municipalities and the ESMF will be a part of these agreements. ILBANK ensures that municipalities work in full compliance with the ESMF, and the subproject-specific E&S documents are prepared and implemented in line with the ESF. The ESMF and RF are integrated into the Operational Manuals of the project and also the core elements are referred in the PADs and Loan Agreements. Therefore, ILBANK is fully responsible for the satisfactory implementation of the E&S framework documents. The ESMF and RF additionally require that site-specific E&S documents are prepared for the subprojects and these become a part of the sub-loan agreements between ILBANK and sub-borrowers.

Through these sub-loan agreements ILBANK and the World Bank manage and monitor the subprojects in conformity with the World Bank’s environmental and social requirements. The ESMF describes the subproject screening criteria according to the World Bank requirements and comparison of World Bank’s requirements and standards with respect to national standards. Similar to the ESMF, the RF compares national law and World Bank policy requirements on land acquisition and sets the principles for a best practice land acquisition process. As a rule of thumb, the most stringent standards apply to the projects for all environmental and social standards.

The screening of subprojects is initially discussed between the ILBANK PMU and sub-borrowers to determine the E&S risks of the project. Before reaching a final agreement on the E&S risks, the ILBANK PMU consults with the World Bank’s E&S team for final decision. The appropriate E&S instrument is then decided upon the mutually agreed E&S risks. ILBANK also undertakes the initial review of the E&S instruments, however substantial risk subprojects will be subject to prior review and approval by the WB.

After site visits and review of E&S documents, ILBANK team prepares semi-annual progress reports for the WB which also includes environmental and social performances related to the subprojects.

Any gaps between the ESF and the existing E&S management criteria of ILBANK will be evaluated in detail and the relevant actions for fulfilling the gaps will be described in the ESCP.

ESS 10 Stakeholder Engagement and Information Disclosure

Currently, potential impacts of the sub-projects are mostly known. Given the sensitivity and complexity of some subprojects, site specific stakeholder engagement plans will be prepared by sub-borrower municipalities. ILBANK has also prepared a Stakeholder Engagement Framework (see Annex 3) as a guidance document for the preparation of sub-project specific SEPs. Six separate Stakeholder Engagement Plans per each municipality/utility and an additional for the landfill project are in preparation by ILBANK. The SEF was disclosed with a public disclosure meeting held on 6 December 2019. SEPs will also be disclosed through public consultation meetings by municipalities at local level with the participation of local stakeholders.

The various sub-projects require stakeholder engagement, and consultations with project-affected peoples are particularly important. Majority of the municipalities have citizen engagement and grievance redress mechanisms in place and additionally, some have established community centers for refugees to address their special needs and improve social cohesion (ie. psycho-social counselling, Turkish language training, child care services, life and vocational skills training). Since the project E&S risk is rated as Substantial, the capacity of ILBANK’s and borrowing municipalities’ to manage stakeholder engagement need to be improved considerably during project preparation in order to minimize the risk of community resistance against the municipal investments. Lack of proper engagement strategies in
previously conducted projects in refugee intense provinces have occasionally led to social unrest among the host communities thus, the project will employ a rigorous engagement strategy throughout the project life, in accordance with ESS10. The existing capacity of the Borrower municipalities will be strengthened through recruitment of communication and stakeholder engagement specialists in order to manage the communication, information disclosure and consultation activities of the sub-projects. As per EU’s communication and visibility guidelines, municipalities will implement stakeholder engagement activities, as defined in their SEPs, to ensure that there are no rising social tensions among host communities and refugees and disseminate clear, culturally appropriate and timely information. As part of their stakeholder engagement plans, sub-borrower municipalities will work with other relevant stakeholders and local government authorities to enhance the quality of the communication activities for targeted refugee groups and host communities, and ensure mechanism whereby the concerns of the various stakeholder groups can be raised and addressed.

Vulnerable and disadvantaged groups (such as elderly, illiterate, people unable to understand host language, women, disabled etc.) will be identified through the ESIA, RPs and during sub-project specific SEPs. Additionally, local NGOs/CSOs (particularly working with refugees on social cohesion issues), community leaders, and local government representatives residing or working in the project areas will also be considered as stakeholders.

Grievance Redress Mechanism: Generally, all municipalities adopt a service called “White Table” which collects complaints and requests from the local residents. Under the ongoing projects of ILBANK, SCP 1 and SCP 2, GRMs are functional and receive grievances from local communities. So far, ILBANK has not received any major grievances within the municipal subprojects financed by the WB. Usually, most of the grievances are either due to construction related noise, dust, traffic interruption or odor of the treatment plants. In cases where additional measures are needed, through utilizing their own GRM, borrowing municipalities will make necessary arrangements in project design, their engagement strategy etc. to minimize complaints and concerns raising from the sub projects. Municipal level GRMs will be assessed by ILBANK to determine whether they are capable of receiving and addressing requests and complaints from the refugee communities in different languages as well. If need be, the project will aim to enhance and improve the current application of the White Table mechanism through project-specific arrangements in order to allow grievances to be collected in both Turkish and other languages spoken by refugees. Any grievance related to a sub-project will first be logged at the municipality level and will be addressed by designated staff within a pre-defined period. If the complainant is not satisfied with the complaint resolution, then the case will be submitted to further levels (ILBANK, national GRM etc.). There will also be other means of submitting grievances such as a toll-free number, online forms, and social media channels of the municipalities made available for citizens to submit grievances. The civil works on treatment plants will be more labor-intensive than other, linear infrastructures. Any potential SEA risks will be assessed for subprojects, and if needed the community-level GRM will be enhanced to accept SEA-related issues/cases.

**World Bank’s Safeguard Policy OP/BP 7.50 Projects on International Waterways**

ILBANK is responsible for ensuring that the projects financed are located/depending on national waterways only. The waterways identified as NOT an international waterway (OP 7.50 does not apply) in Turkey are as follows: Susurluk, North Aegean, Gediz, Kucuk Menderes, Buyuk Menderes, Western Mediterranean, Antalya, Sakarya, Western Black Sea, Yesilirmak, Kizilirmak, Konya Kapali, Eastern Mediterranean, Seyhan, Ceyhan, Eastern Black Sea, Burdur, Afyon, Orta Anadolu, and Van. Any subproject that that OP 7.50 applies will not be eligible for Bank financing.
3 BASELINE ANALYSIS

The project aims to improve water supply, sanitation and solid waste services in selected municipalities that have seen significant population increases as a result of refugee arrivals. The targeted municipalities are located in mid and southeastern part of Anatolia. The targeted municipalities within provinces affected by refugee influx for this project finance are Adana, Kahramanmaras, Kayseri, Konya, and Osmaniye.

Most of the municipalities in these provinces already experienced operational problems such as high water losses, inadequate water treatment, inadequate access to wastewater collection, and lack of wastewater treatment caused by limited financial resources and insufficient institutional capacity. The increased population has also put additional pressure on infrastructure and municipal services, and catalyzed the need for immediate action.

The table below presents the Syrian refugee population respectively amounting to more than 540,000 consisting around 5-10% of the project province populations.

<table>
<thead>
<tr>
<th>Province</th>
<th>Population (address based registration in 2018)</th>
<th>Syrian Refugee Population 2017*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adana</td>
<td>2,220,125</td>
<td>204,200</td>
</tr>
<tr>
<td>Kahramanmaras</td>
<td>1,144,851</td>
<td>100,403</td>
</tr>
<tr>
<td>Kayseri</td>
<td>1,389,680</td>
<td>74,612</td>
</tr>
<tr>
<td>Konya</td>
<td>2,205,609</td>
<td>107,664</td>
</tr>
<tr>
<td>Osmaniye</td>
<td>544,415</td>
<td>54,175</td>
</tr>
<tr>
<td>Total</td>
<td>7,504,680</td>
<td>541,054</td>
</tr>
</tbody>
</table>

*Source: "Technical Assistance to the EU Facility for Refugees in Turkey (2017/393359/1) report Annex 2 - Statistical Data on Syrians under Temporary Protection Table 46"

The subprojects will take place in semi-urban and urban areas, where refugee presence is high and access to municipal infrastructure needs to be improved.

In the following sections, a short general description of the geographical conditions along with the social and economic baseline of the five provinces are provided.

Below table shows the general outlook of the social baseline of provinces;

<table>
<thead>
<tr>
<th>Province</th>
<th>Unemployment Rates (%) (2013 TUIK)</th>
<th>Literacy Rates (%) (TUIK 2018)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adana</td>
<td>13.2</td>
<td>96.48</td>
</tr>
<tr>
<td>Kahramanmaras</td>
<td>11.6</td>
<td>95.12</td>
</tr>
<tr>
<td>Kayseri</td>
<td>9.9</td>
<td>97.51</td>
</tr>
<tr>
<td>Konya</td>
<td>4.7</td>
<td>97.84</td>
</tr>
<tr>
<td>Osmaniye</td>
<td>14.0</td>
<td>95.31</td>
</tr>
</tbody>
</table>

3.1 Adana

Adana is situated on the eastern Mediterranean region and is a city in southern Turkey. Adana is bordered by Hatay (and its neighbor Syria) in the south, Osmaniye and Kahramanmaras in the east.

Adana is located at the north eastern edge of the Mediterranean, where it serves as the gateway to the Cukurova plain, which has historically been known in the West as the Cilicia plain. This large stretch of flat, fertile land lies southeast of the Taurus Mountains. From Adana, crossing the Cukurova westwards, the road from Tarsus enters the foothills of the Taurus Mountains,
eventually reaching an altitude of nearly 4,000 m. It goes through rocky Gulek Crossing, and continues to the Anatolian plain.

The north of the city is surrounded by the Seyhan reservoir. The Seyhan Dam, completed in 1956, was constructed for hydroelectric power and to irrigate the lower Cukurova plain. Two irrigation channels in the city flow to the plain, passing through the city center from east to west. There is another canal for irrigating the Yuregir plain to the southeast of the city.

Typical Mediterranean climate is observed in the city. The summers are hot and arid, the winters are warm and rainy. The average amount of annual average precipitation is about 644.6 mm according to the records of the District Directorate of Meteorology. The dominant wind direction is northeast and northwest. Since the center is very hot and dry in the summer, an important population in this period migrates to the north areas with higher elevation.

Adana is one of the first industrialized cities, as well as one of the economically developed cities of Turkey. Together with the construction of the Seyhan Dam and the development of agricultural techniques, there have been great developments in agricultural yield in the 1950’s and then all economical activities.

Adana is an industrialized city where large-scale industry is based mostly on agriculture. Food processing and fabricated metal products are the major industries constituting 27 percent of Adana's manufacturing. The largest company in Adana, Temsa Global, an automotive manufacturer, has more than 2,500 employees and manufactures 4,000 buses annually. Marsan-Adana is the largest margarine and plant oil factory in Turkey. Advansa Sasa is Europe's largest polyester manufacturer. Organized Industrial Region of Adana has an area of 1,225 hectare with 300 plants, mostly medium-scale.

Cukurova is one of the most fertile plains of the country, which has been an attraction center for many years due to the fertile soil brought by alluviums. Wheat, sunflower, olive, pomegranate, corn, citrus (orange, citrus, mandarin and lemon), banana, kiwi, legumes, sugarcane, potatoes, tomatoes, pepper, lettuce, cabbage, onion, rice, soybean, cotton, grape, peanut, broad bean, cowpea, bean, cucumber, almond, watermelon, melon are produced as many products. Most important product in the region is cotton. In addition to agriculture, livestock breeding (cattle/sheep) in whole districts of Adana as well as sea food production in Yumurtalik and Karatas districts also contributes to the economy of the Adana. The presence of animals in the province of Adana varies according to the geographical situation of the province, climatic conditions and agricultural character.

Metals like chrome, lead, manganese and iron, industrial raw materials like coal, quartzite, barite, limestone and coal are found in Adana and surrounding area.

After the Syrian war began seven years ago, Adana became one of the most preferable arrival points for Syrians because of similar sociological and geographical conditions and also Adana’s economic activities when compared to other surrounding Turkish cities. Currently Syrian refugees began to work, setting up business and buy houses in Adana and its districts. The situation has resulted in additional demand for municipal and infrastructural services including water and wastewater management systems. Total population of the city is 2,216,475 as per the address-based census for year 2018. The recorded population of Syrian refugees is 223,026 (10.1% of whole Adana population) according to official records issued (Ministry of Interior Works, General Directorate of Immigration, 16.08.2018) and new Syrian refugees are expected to come to Adana.

In order to solve water deficiency problems in some settlements of Adana, ASKI has initiated a design for Kozan Imamoglu Yedigoze Drinking Water Transmission Line, Yedigoze Water Treatment Plant and Kozan Pinargozu Drinking Water Transmission Line and Network
projects. These projects aim to supply water to centrum of 4 sub-provinces and 137 neighborhoods (total 141 settlements) from Yedigöze Dam Reservoir which will eliminate well usage in these areas.

3.2 Kahramanmaraş

Kahramanmaraş province is located in the southern Turkey, namely the Mediterranean Region. Kahramanmaraş is surrounded by Sivas from the north, Malatya from the northeast, Adiyaman from the east, Gaziantep from the south, Adana and Osmaniye from the west and Kayseri from the northwest.

The city center is located on the slopes of the Ahir Mountain and on the Maras plain. The topographic structure of the city center has a sloping structure from north to south. There is no natural lake in Kahramanmaraş province. The lake of Gavur, which is in the swampy the basin, is dried by DSI. In the Ahir mountains to the north of the city center, Karagol and Kucuk Gol, which are in the tectonic-karstic characteristics, are located in the mountains. There is a small lake and reeds in the area.

Elbistan District is rich in ground water and surface waters. The Ceyhan River is rising in district center of Elbistan called Pinarbasi Region. It is connected with Sogutlu Creek and leaves Elbistan from north-west. The land is generally inclined from the South to the North. In the northern parts of the zoning plan, the land inclined towards the South Sogutlu Creek. The altitude of the land is slightly descends towards to Ceyhan River and Sogutlu Creek.

A Mediterranean climate similar to a terrestrial one is dominating in Kahramanmaraş. Kahramanmaraş is located on an area which is close to three different regions (Mediterranean Region, East Anatolia Region, and Southeast Anatolia Region). Because of Kahramanmaraş’s geographical location and other factors, spoilt Mediterranean climate dominates among the three different climates. Summers are hot and winters are cold in Kahramanmaraş. Unlike the climate which dominates in the center, terrestrial climate becomes dominate in the northern part of the city owing to altitude. Annual temperature average in the center is 16.9°C. It decreases from south to north and from west to east because of the effects of terrestrial climate. Rainfalls are generally seen in winter months. The annual average precipitation amount is 710 mm. The dominant wind direction is north.

Kahramanmaraş is a province where there is an apparent tension between agriculture and industrialization. Approximately 46% of the population live in rural areas and mainly engage in agricultural activities. Within the socio-economy of the province, the sectorial ranking is agriculture, industry, trade, transportation, communication and construction. Industrialization in Kahramanmaraş is mainly concentrated in the Centre districts. The real sector development in Kahramanmaraş started in 1980s. Industrialization has generally taken place in the field of textiles. After textile, steel goods industry has been the other sector that showed a rapid development. There have been large scale investments in textile industry, metal utensils, power generation, pulp and paper industry and the cement industry in Kahramanmaraş.

The province has 22 companies in the list of “top 1000 largest industry enterprises in Turkey”. In 2016, Kahramanmaraş has reached a growth rate of 10% and with its 280 exporting companies reached a total export volume of $ 870 million. In 2016, textile industry, being the locomotive of the economy of Kahramanmaraş, increased by 10.27% and exports of textile reached 586 million dollars. In 2016, the metal goods sector followed a flat course with $ 97.8 million; ready-to-wear clothing reached a growth rate of 24.2% and exported at a volume of $ 61.2 million; and finally the paper sector export increased by 3% to $ 43.5 million. In 2016, the number of companies opened in Kahramanmaraş was 924 and the closing companies decreased by 9% compared to the previous year and recorded as 248 and general employment figures of
the province increased by 2.5% compared to the same month of the previous year (2015) and reached to 139,693.

Like other similar developing provinces in Turkey, Kahramanmaras has also its own specific problems regarding the migration, urbanization and population growth. While industrialization has changed the socio-economic structure of the province, some problems have arisen due to the intensification of the industrialization especially in some specific areas of the region. Rapid population growth, urbanization, industrial investments and interregional imbalance of income distribution are the most evident indicators of socio-economic situation in Kahramanmaras. The concentration of industry and trade in the city accelerated the migration of the village population to the city. As a result of this, the economic, social and cultural difference between the city and the village has increased gradually. In the recent years, huge air and environmental pollution problems and the lack of housing infrastructure in Kahramanmaras have started to cause problems for the province itself and Turkey. Although, Kahramanmaras has a certain priority in terms of industrialization in the Mediterranean Region and in Turkey in general, there are many indicators that showcase the city and population as a traditional agricultural society. According to the Socio-Economic Development Ranking of the Provinces done by Development Ministry of Turkey, Kahramanmaras ranked 60th in terms of socio-economic development among 81 provinces of Turkey.

Kahramanmaras is one of the 10 cities in Turkey with the highest Syrian population. Kahramanmaras has a population of 1,127,623. In 2016, there were 86,347 Syrian refugees in Kahramanmaras, corresponding to the 7.9% of its local population of 1,096,610. In 2018, it has been depicted that there are 117,907 Syrian refugees living in Kahramanmaras corresponding to a ratio of 9.6% of its local population of 1,127,623. The number of Syrian refugees in the province has increased by 78% in the last six years between 2012 and 2018.

The accelerated migration of Syrians to Kahramanmaras in the past years has led to an growing demand for improved infrastructure and superstructure facilities. The priority issues have been identified by Kahramanmaras Municipality and KASKI to improve the health standards and to protect natural resources in the region. These priority issues include integrated solid waste management, increasing capacity of water supply, wastewater collection and treatment and storm water collection.

3.3 Kayseri

Kayseri is located on the crossing point of South Central Anatolia and Toros Mountains. The neighboring cities are: Sivas in east and southeast, Yozgat in north, Nevşehir in west, Nigde in southwest, Adana and Kahramanmaras in south. Kayseri’s area is 17,109 km², and elevation is 1,050 m.

The highest and the most important mountain in the city is Mouth Erciyes (3,916 m). Erciyes is a cluster of dormant volcanos. Kayseri has two major lakes called Yay (surface area of 94.4 km²) and Tuzla (surface area of 23.3 km²). Major lakes inside the city borders are: Camiz, Col, Sarıgöl, Yay, and Tuzla. Rivers in the city are Kızılırmak, Zamanti (joins into Seyhan River), and Sarız Creek (joins into Ceyhan River).

Kayseri has a cold semi-arid climate. Summers are usually hot and dry, winters are cold and snowy. Main vegetation in Kayseri is steppe. Although there are some small forest lands south of the city consists of larch, pinus brutia, fir, spruce, and oak trees, most of the forest lands are destroyed by humans.

In the city, 577,000 hectares of land is used for agriculture. This amount corresponds to 34% of the city lands. Maximum share in the usage of the agricultural land belongs to the cereal
products with 85% and secondly to sugar beet. Remaining agricultural lands are separated for legume, fatty seeds, tuberous crops, fruits and vegetables.

Kayseri, throughout Turkey, is in 13th rank in terms of animal value and in 21st rank in terms of animal products. In the city, especially cattle farming, laying poultry and culture fishing are important sub-economic activities. In the city, there are totally 286,299 (2016) cattle and 647,070 ovine. 98% of the cattle are beews. Average milk efficiency per cattle is 3.2 tons/year. Especially the existence of suitable climatic conditions for buffalo farming in Develi district and the fact that the price of buffalo milk per liter is twice of cattle milk increases the investment demand for buffalo farming. But on the other hand, the absence of institutions has led to a decline in animal husbandry compared to 2010.

According to the Industry Registry Records of Ministry of Science, Industry and Technology (2014), industry of Kayseri is the 6th developed city with a share of 3% in the total industrial enterprises in Turkey. After 1950s, the effect of increasing private sector investments and the previous business experiences have caused Kayseri to rise in machine – spare part, textile, metal goods and electrical appliances. Rise of Kayseri furniture sector has started with sofa, seats and beds. Kayseri, with its companies making production in all branches of furniture with technological developments and new investments, has become an important furniture center in Turkey.

When reserves are taken into account in Sivas and Kayseri, more than 50% of iron ore of Turkey is in TR72 region. Another important metallic mineral of the region is chrome. 17% of the mining licenses in Kayseri belong to the chrome mine. Kayseri is rich in pumice among industrial raw materials. Despite the presence of unoccupied fields, the number of mining licenses and the amount of production are higher for pumice than for other minerals. Generally, metallic minerals such as iron and chromium stand out in Kayseri.

According to a statement from the General Directorate of Administration, the number of Syrians registered in Kayseri was 58,430 in 2016. When this number is compared to the population of Kayseri, which was 1,358,980, it has been seen that the Syrians constitute 4.3% of the total population of the province. Target year 2001 design objectives were immediately reached by KASKI’s taking over the operation of the wastewater treatment plant on the year of 2005. Thus, when compared with the design considerations; unforeseen immigration of Syrians accelerates reaching to projected target year 2025, 1,400,000 p.e. and especially dry weather flow rate of 183,000 m³/day is very soon to be reached. Those aforementioned points, states the urgency of extension of WWTP and solar dryer to increase the dryness of solid content generated sludge, while considering the amount is much more than estimated due to operational complexities encountered.

Additionally, another objective of the sub-project is to extend the Kayseri wastewater treatment plant that will meet both Turkish and EU standards in order to prevent the ecological balance in the receiving body from further damage and to rehabilitate the ecological balance in the creek.

3.4 Konya

Aksehir

Aksehir is a sub-province of Konya and is located in the Central Anatolian Region. It is 15 km away from both Aegean Region and Mediterranean region and located in the crossing of the three regions, in the eastern lakes region. It is surrounded by provinces Ankara at the northeast, Eskisehir at North, Afyon at Northwest, Konya on the East and southeast, Isparta on the west
and Aksehir sub-district center is surrounded by Aksehir Lake on the north. The subdistrict has an area of 1,142 km². Aksehir is 1050 m above sea level.

The Sultan mountain chain at the south of the district and the water collection basin of Aksehir Lake on the North, determines the morphological structure of the region. The Sultan Mountain chain on the northwest-southwest direction, has Tekkale hill with an altitude of 1664 m, Camlik hill 1731 m and Gelincikana hill 2610 m as its peak. Aksehir Lake is 958 m above mean sea level.

The most important stream is the Adiyan brook coming from Doganhisar direction and joining Aksehir Lake at 5-6 km northwest of Aksehir. Aksehir brook starts from Sultan Mountains and flows through the town by separating it into two. In summer season the creek completely dries out.

The region has a continental climate. In addition, it is a transition zone between central Anatolia and west-central Anatolia. Summers are hot and dry, winters are cold and rainy. Yearly precipitation amount is 690 mm. Precipitation occur in winter and spring time. Aksehir and its surroundings is one of the rainiest regions of central Anatolian Region.

Aksehir is engaged in irrigated and dry farming. Vegetable and fruit production is developed. Cereals, beets, legumes, industrial plants, and animal feeds production plays an important role. The total area of cultivated agricultural area in the district is 318,543 da. Aksehir district’s total meat production constitutes 4.09% of Konya’s meat production and the district also has a significant poultry potential. There is marble, brick and tile soil, and barite reserves in the district and a marble quarry is operated. Fruit processing, flour, feed, milk processing, manufacturing of starchy and pastry products are conducted in the district.

The current population of Aksehir is approximately 65,000 including 5,000 Syrians refugees. The number of refugees account for 8% of the entire population in Aksehir. Furthermore, there are more than 20,000 of Syrians located temporarily in Konya city center, who are expected to be relocated to sub-provinces of Konya, such as Aksehir. The rapid increase recorded between 2010-2011 was based on replacement of counting system by address based population system. Thus, projected population for 2040 has been reached earlier than expected. This justifies the urgent need for additional water supply pipeline projects which are planned to be finalized in next years.

3.5 Osmaniye

Osmaniye; is located in eastern part of Mediterranean Region with regions climatic characteristics, climbing up from west to north by Middle Taurus and at east and southeast by Amonos Mountains. It is surrounded by Adana in west, Hatay in south, Gaziantep on east and Kahramanmaras on north.

It is separated into two region as surface plains and mountainous. Mountainous areas surface shapes are quite undulating and have steep regions. In general northwest region has slopes also other directions has slopes and valleys. Main rivers area; Karacay, Hamus Creek and Ceyhan River. Main mountains are; Koyuntepe (2,168 m), Dumanlidagi (2,102 m), Yaglipinar Dazi Tepe (2,085 m), Topbarnaz Tepe (2,067 m), Cerleme Tepesi (1,965 m), Binboga Mountains.

The climate is Mediterranean Climate with hot and dry summer time and warm and rainy winter time. Also in valleys there is microclimatic climate conditions with moisture similar to Blacksea Climate. The forest covering most of the areas warms weather in summer and heats in winter. Because the Amonos Mountains are parallel to Mediterranean Sea, it can cause short term rains. Although the high altitudes have snow in winter, rain is effective in lower altitudes.
Regarding the urbanization rates of the cities, Osmaniye is at the 17th place by its urbanization rate of 72%. The city with its 15.2% population growth rate between 2008-2009 is above Turkey’s population growth rate. Unemployment rate in 2008 is 16.3% according to TUIK statistics. City’s rate of industrial employment to general employment is lower than Turkey’s average, and rate of agricultural employment to general employment is higher than Turkey’s average.

Osmaniye is an agricultural district; growing cotton, peanuts and oranges; raising cattle, sheep and goats wherein the City of Osmaniye is the district’s main urban settlement accounting for just over 70% of the district’s resident population.

In terms of socio-economic development the ‘Osmaniye with Selected Indicators’ study carried out by State Planning Organization in 2011 indicates that unemployment in the Osmaniye District was 14.4% (ranked 7th highest in provinces in 2010 in Turkey) and of those employed 35.5% were employed in agriculture, 39.7% were employed in Public Service jobs, with the remaining 24.8% employed in other industries. In addition, TUIK indicates in its ‘Income & Living Standards Survey 2006-2010’ that for 2010 the Akdeniz NUTSII region, within which the City of Osmaniye lies, has ‘annual equalised household disposable incomes’ slightly below that of the national average.

The export rate of Osmaniye which was low in 2004, has been started to increase as of 2008. Main export sector is industry. The shares of relevant sectors in export rate are; agriculture by 22%, industry by 77%, mining by 1%.

The forced migration of Syrian refugees led the Turkish Government to apply a strategy of distributing the refugee population to several regions/cities. Osmaniye remains as one of the selected camp regions for Syrian refugee. According to data obtained from the Directorate General of Migration Management (dated 11 October, 2018), there are 48,055 Syrian refugees in Osmaniye of which 14,174 are located in temporary accommodation center. Majority of the refugees are mainly settled in the city center with a ratio of 20.6% of the total population. Existing infrastructure has come under severe pressure due to this unexpected increase in population.

As the number of refugees increases, the demand for water and wastewater services also increases. In order to provide sufficient water and wastewater services to both inhabitants and Syrian refugees, the existing systems must be expanded and renewed. Therefore, two infrastructure projects for Osmaniye have been initiated which include construction of drinking water network and reservoirs, and sewerage network.

4 ANALYSIS OF POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS OF PROPOSED SUBPROJECTS

4.1 Environmental and Social Risk Categorization of Proposed Subprojects

The WB and the ILBANK team have determined the environmental and social risk categorization of each subproject as in Table 4.
## TABLE 4. E&S RISK CATEGORIZATION OF PROPOSED SUBPROJECTS

<table>
<thead>
<tr>
<th>No</th>
<th>Subproject</th>
<th>E&amp;S Risk Categorization</th>
<th>E&amp;S Assessment Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-1</td>
<td>Kozan Imamoglu Yedigoze Drinking Water Transmission Line</td>
<td>Substantial</td>
<td>ESIA; SEP; Dam safety assessment; Ex Post Social Audit for subproject 1-2</td>
</tr>
<tr>
<td>1-2</td>
<td>Yedigoze Water Treatment Plant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1-3</td>
<td>Kozan Pinargozu Drinking Water Transmission Line and Network</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2-1</td>
<td>Kahramanmaras Northern Districts Integrated Solid Waste Project</td>
<td>Substantial</td>
<td>ESIA; SEP; RP and Ex Post Social Audit</td>
</tr>
<tr>
<td>2-2</td>
<td>Kahramanmaras (Centrum) Drinking Water Project</td>
<td>Moderate</td>
<td>ESMP; SEP(covering subprojects 2-2, 2-3, 2-4, 2-5, and 2-6)*; Ex Post Social Audit for subproject 2-2</td>
</tr>
<tr>
<td>2-3</td>
<td>Kahramanmaras (Centrum) Sewerage Project</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2-4</td>
<td>Ceyhan Basin Wastewater Treatment Plants - Ekinozu WWTP and Collectors</td>
<td>Substantial</td>
<td>ESIA; SEP (covering subprojects 2-2, 2-3, 2-4, 2-5, and 2-6)*; RP</td>
</tr>
<tr>
<td>-</td>
<td>- Caglayancierr WWTP</td>
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<tr>
<td>-</td>
<td>- Andirin WWTP and Collectors</td>
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</tr>
<tr>
<td>-</td>
<td>- Goksun WWTP and Collectors</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2-5</td>
<td>Elbistan Drinking Water Network Project</td>
<td>Moderate</td>
<td>ESMP; SEP (covering subprojects 2-2, 2-3, 2-4, 2-5, and 2-6)*; RP</td>
</tr>
<tr>
<td>2-6</td>
<td>Elbistan Drinking Water Transmission Line</td>
<td></td>
<td>RP and Ex Post Social Audit</td>
</tr>
<tr>
<td>3-1</td>
<td>Extension of Kayseri Wastewater Treatment Plant</td>
<td>Substantial</td>
<td>ESIA; SEP</td>
</tr>
<tr>
<td>4-1</td>
<td>Aksehir Water Supply Project</td>
<td>Moderate</td>
<td>ESMP; SEP</td>
</tr>
<tr>
<td>4-2</td>
<td>Ilgin Wastewater Treatment Plant</td>
<td></td>
<td>E&amp;S risk categorization will be realized once Project documents are available. Relevant E&amp;S documents to be prepared will be decided after risk categorization in line with this ESMF.</td>
</tr>
<tr>
<td>4-3</td>
<td>Cumra Wastewater Treatment Plant</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5-1</td>
<td>Osmaniye (Centrum) Drinking Water Project</td>
<td>Moderate</td>
<td>ESMP; SEP</td>
</tr>
<tr>
<td>5-2</td>
<td>Osmaniye (Centrum) Sewerage Project</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*For subprojects in Kahramanmaras, 2 SEPs will be prepared in total; one for No 2-1, and one for No 2-2, 2-3, 2-4, 2-5, and 2-6.

In addition to the E&S assessment requirements indicated in Table 4, a resettlement framework (RF) has been prepared by ILBANK for all 5 municipalities. As ESS2 will be applied to the subprojects, a separate labor management procedure (LMP) has also been prepared within this scope.

### 4.2 Potential Environmental and Social Impacts of Proposed Subprojects

This section identifies the potential environmental and social impacts that could arise from the activities of the sub-projects either during the construction phase or the operational phase.
First, the highlighted impacts are broad and envisaged as cutting across most of the sub-projects. The specific potential impacts for each sub-project will be given in a separate section below based on the completed environmental impact screening reports.

However, more detailed potential environmental and social risks of each sub-project will be assessed during the preparation of the specific sub-project ESIA or ESMP. Proposed mitigation measures to avoid, reduce or compensate the impacts of such activities will be identified in these reports.

4.2.1 Cross Cutting Potential Impacts

Typical project activities to be implemented are broadly categorized into:

- Construction phase, and
- Operation phase.

General, cross-cutting potential environmental impacts, which could be expected for all subprojects, are presented below.

**Construction Phase**

**Environmental Impacts**

**Soil erosion**

During the construction of infrastructures, excavated soil may be exposed to agents of erosion, mostly water and wind. This impact is going to be low in significance in terms of magnitude. The erosion that will occur during the construction will be minimal and localized in the areas where excavation will take place only. The impact duration is only expected to be felt during the construction phase.

**Loss of vegetation**

There might be tree and other vegetation loss during the construction phase for each subproject either to pave way for access roads or for the actual project construction area. The vegetation will be cleared so that the area where the construction work is to take place is clear for the construction work to be performed. The construction works will involve direct land take of productive pasture land and agricultural lands, bush clearing, removal of top soil, excavation and mass haulage. These activities will also expose the land to elements of erosion such as wind and water and thus will trigger the process of land degradation.

**Dust and exhaust gases emission and noise pollution**

During construction, there will be movement of construction equipment at the project site. Dust and exhaust emissions that may cause air pollution as well as noise, can be expected from earth moving activities by excavators and trucks plus other machinery such as concrete mixers, dumpers, etc. This impact can be considered of low in terms of magnitude, duration, and spatial extent, as it is localized and occurs only during the construction phase.

**Water pollution**

Civil works at the project site could be a risk of contaminating the clear river water with cement and muddy waters or soil movement. Increase in suspended particles due to construction works, risk of human contamination from construction camps and production of wastewater originated from the workers might affect the surface water and groundwater quality especially where the
subprojects are close to natural water bodies. This impact is of low in significance in terms of magnitude and spatial extent. It could occur only during construction phase and rainy period.

**Solid Waste**

Solid waste is a potential environmental risk that will be as a result of abandonment of litter/construction materials on site, use of plastic container/bags by road users and the construction crew and use of polythene sheet for curing by the contractor. Construction camps may be a further source of solid wastes.

**Social Impacts**

**Occupational Health and Safety and Labour**

Construction works can cause incidents and accidents that may threaten the health and safety of workers if measures are not taken proactively.

Potential health and safety risks during the construction have been listed below;

- Working at height,
- Moving objects,
- Slips and trips,
- Noise vibration and exposure to dust,
- Materials handleings,
- Unintended collapse,
- Asbestos,
- Electricity,
- Traffic related risks due to increased traffic, and
- Associated risk of occupational accidents, injuries and diseases.

Details and area specific risks will be obtain during site studies and will be assessed under social impact sections of the documents. Mitigation measures and occupational health and safety issues are managed in line with the Occupational Health and Safety Law (Law No: 6331, Date of Enactment: 20/06/2012), World Bank ESS2 and World Bank Group General Environmental Health and Safety Guidelines.

**Community Health and Safety**

Project should bring benefits to both host communities and Syrian refugee communities in terms of improved access to municipal services which in turn may enhance local business opportunities and new infrastructure opportunities in the region. However, there may also be impacts arising from accidents, structural failures, release of hazardous materials, impacts on water quality and quantity, pressure on existing social infrastructure and SEA risk due to labor influx, construction impacts on natural resources, exposure of disease. The Project identified the following potential CHSS impacts due to the construction phase.

- Speed and road damage of transportation and traffic; increased traffic and risk of road traffic accidents and injuries,
- Risk of spreading of communicable diseases,
- Access to clean and sustained water sources,
• Damage to existing underground public utility cables and pipes and disruption of services,
• Noise and Vibration,
• Increased demand on existing community health and sanitation infrastructure due to influx of temporary workers & camp followers,
• Threat to community culture, safety and security associated with presence of construction workers and business opportunists,
• Potential damage to underground public utility cables and pipes and disruption of services,
• Risk of communicable diseases such as sexually transmitted diseases (STDs) due to labor influx and interaction of temporary workers with host communities, and increased SEA risk,
• Effect of the construction on the accessibility for the community,
• Effect of the construction on potential vulnerable groups, and
• Impacts on potential waste pickers in the project site (if any present).

Traffic

Traffic congestion and temporary interruptions from construction phases of the investments and which could potentially cause annoyance, disruption, health and safety impacts, as well as economic impacts. The use of heavy moving construction vehicles and machineries in project sites is generally known to cause traffic reducing movement and flow of vehicles. This is likely to cause increased frequency and severity of accidents.

Loss of Land and Livelihoods

The existing land use of the project area will be affected by the construction of access roads, construction camps, opening up of material sites and quarry sites among others. These will scar the land, cause vegetation loss leading to soil erosion. In the local communities, project-affected people may lose their land, assets and means of livelihood due to construction needs of the investments. These impacts may comprise loss of farm land, grazing land, businesses and structures among people with formal or informal ownership of the affected lands.

Vulnerable groups

Certain vulnerable groups such as disabled people, children or elderly people, refugees, groups with livelihood dependencies in the project regions might be affected during the construction phase. An environmental and social impact assessment to be conducted at the subproject level will identify vulnerable groups relevant to respective subprojects. Care will be exercised so that subprojects are designed so that Syrian refugee will receive fair and equitable benefits without creating a perception among host communities that subprojects only favour refugee communities. This will be ensured through the communication strategy inherent in the SEP, which will clearly communicate the shared benefits to both populations of the project investments.

Sub-project specific ESIAs/ESMPs will consider any impacts in association with the daily living patterns of potential vulnerable groups (i.e school aged children commuting for school) that may be generated due to civil works. Similarly measures will be in place to prevent labor influx related risks on communities, in particular women, residing in the vicinity of the proposed sub-project sites.
Operation Phase

Environmental Impacts

Odor and Noise

Due to improper operation of water and wastewater treatment plants, odor problems may occur. If there is a settlement nearby, there may be some complaints. Noise may also be a problem arising from pumping stations and treatment plants. Odor and noise problems might also occur during the operation of sanitary landfills, particularly due to improper operation practices.

Soil and Water Pollution

Leakage of chemicals used in treatment plants to soil or water sources in the vicinity may cause pollution. Improper management of excess sludge also causes negative impacts on the ambient media. During the operation of sanitary landfills, wastes spilled from trucks can pollute roads and the environment. Potential impacts from the uncontrolled flow of leachate into the groundwater might include degradation of groundwater quality, soil contamination and adverse impacts to surface water quality.

Climate Change

Methane gas as a GHG emission may emit to the atmosphere from landfill sites and might contribute to the climate change. Similarly treatment sludge generated from wastewater treatment plants may cause an adverse effect on climate change issues.

Social Impacts

Health and Safety

Operators of water and wastewater treatment plants and sanitary landfill might be exposed to variety of hazards during the operation and maintenance.

Traffic

Trucks carrying sludge from treatment plants and waste to the landfills can readily create significant traffic problems, increased air pollution, roadway deterioration, etc.

4.2.2 Subproject Specific Potential Risks

Subproject 1-I: Kozan Imamoglu Yedigoze Drinking Water Transmission Line

Environmental Impacts

Landscape and Visual

Although, the water transmission line will be constructed at existing roads, temporary disruptions and/or access problems might occur. In addition, the landscape will be limited affected by water tunnels.

Noise

The use of equipment and machinery during the construction phase, including the excavation and filling works, might cause noise and vibration impacts. Also during operation phase, pumping stations may be the source for noise.
Ecology and Nature Conservation

There are no areas in project area under ecological and natural protection.

Flood Risk

Because of the natural slope and existing storm water drainage system, there are no risks for floods and landslides.

Odor Risk

There is no odor risk during the construction and operation phases of water transmission line.

Impacts on surface water/groundwater

There are no protected aquifers in vicinity of the project area. Although, no construction works will be done directly within Yedigoze Dam area, it will be water source for the project.

In addition, onsite storage and use of materials such as oils, fuels, paints, etc. and wastewater generated from worksite, involves a risk of their spillage and leakage into soils, watercourses and groundwater.

Social Impacts

Occupational Health and Safety

Construction works can cause incidents and accidents that may threaten the health and safety of workers if measures are not taken proactively.

Potential health and safety risks during the construction are listed below:

- Working at height,
- Moving objects,
- Slips and trips,
- Noise vibration and exposure to dust,
- Hazardous material handlings,
- Unintended collapse,
- Improper management of asbestos,
- Electricity shocks,
- Traffic related risks due to increased traffic, and
- Associated risk of occupational accidents, injuries and diseases.

Community Health and Safety

The Project identified the following potential community health and safety impacts due to the construction phase.

- Speed and road damage of transportation and traffic; increased traffic and risk of road traffic accidents and injuries,
• Damage to existing underground public utility cables and pipes and disruption of services,
• Effect of the construction on the accessibility for the community,
• Effect of the construction on vulnerable groups and risk of SEA,
• Increase demand on existing community health and sanitation infrastructure due to influx of temporary workers & camp followers,
• Threat to community culture, safety and security associated with presence of construction workers and business opportunity, and
• Potential damage to underground public utility cables and pipes and disruption of services.

As the transmission line will be fed by the Yedigoze reservoir on the Yedigoze dam/hydropower plant, the World Bank Dam Safety Expert conducted a due diligence on dam safety aspects for Yedigoze dam as part of project preparation. The assessment will be completed after the relevant documents are shared with and reviewed by the World Bank.

Traffic
During the excavation and filling works of water transmission line, temporary traffic interruptions might occur.

Loss of Land
The route of water transmission line is on existing roads and there is no need for expropriation.

Cultural Heritage
There are no known cultural heritage on project area.

Subproject 1-2: Yedigoze Water Treatment Plant

Environmental Impacts

Landscape and Visual
Although, the water treatment plant will be constructed on ASKI property, there will be visual impacts due to the footprint of the treatment plant.

Noise
The use of equipment and machinery during the construction phase might cause noise and vibration impacts. Also during operation phase, equipment (pumps, blowers etc.) may be the source for noise.

Ecology and Nature Conservation
There are no area in project region under ecological and natural protection.

Flood Risk
During the construction phase flood might occur during heavy rain.
Odor Risk

There is no odor risk during the construction and operation phases of water treatment plant.

Impacts on surface water/groundwater

There are no protected aquifers or surface waters in vicinity of the project area. However, onsite storage and use of materials such as oils, fuels, paints, etc. and wastewater generated from worksite, involves a risk of their spillage and leakage into soils, watercourses and groundwater.

Social Impacts

Potential health and safety risks during the construction have been listed below;

- Working at height,
- Moving objects,
- Slips and trips,
- Noise vibration and exposure to dust,
- Hazardous material handlings,
- Unintended collapse,
- Improper management of asbestos,
- Electricity shocks,
- Traffic related risks due to increased traffic, and
- Associated risk of occupational accidents, injuries and diseases.

Community Health and Safety

The Project identified the following potential community health and safety impacts due to the construction phase.

- Speed and road damage of transportation and traffic; increased traffic and risk of road traffic accidents and injuries,
- Damage to existing underground public utility cables and pipes and disruption of services,
- Effect of the construction on the accessibility for the community,
- Effect of the construction on vulnerable groups and risk of SEA,
- Increase demand on existing community health and sanitation infrastructure due to influx of temporary workers & camp followers,
- Threat to community culture, safety impacts due to the and security associated with presence of construction phase workers and business opportunity, and
- Potential damage to existing underground public utility cables and pipes and disruption of services.

Traffic
During the construction phase of water treatment plant, temporary traffic interruption might occur.

*Loss of Land*

The area where water treatment plant is planned to be built had been acquired by ASKI about one year ago. No additional land expropriation will be necessary. An Ex-Post Social Audit will be conducted to assess/evaluate the completed land acquisition process in light of the ESS5 and develop gap filling measures, if necessary. Corrective action plan will be developed if substantial gaps are found to ensure material consistency of the past land acquisition with the requirements of the ESS5.

*Cultural Heritage*

There are no known cultural heritage on project area.

**Subproject 1-3: Kozan Pinargozu Drinking Water Transmission Line and Network**

**Environmental Impacts**

*Landscape and Visual*

Although, the water transmission line and network will be constructed at existing roads, temporary disruptions and/or access problems might occur. In addition, the landscape will be limited affected by water tunnels.

*Noise*

The use of equipment and machinery during the construction phase, including the excavation and filling works, might cause noise and vibration impacts. Also during operation, pumping stations may be the source for noise.

*Ecology and Nature Conservation*

There are no area in project region under ecological and natural protection.

*Flood Risk*

Because of the existing storm water drainage system, there are no risks on water network for floods and landslides. However, during the construction phase of water transmission line, flood might occur during heavy rain.

*Odor Risk*

There is no odor risk during the construction and operation phase of water transmission line and network.

*Impacts on surface water/groundwater*

There are no protected aquifers or surface waters in vicinity of the project area. However, onsite storage and use of materials such as oils, fuels, paints, etc. and wastewater generated from worksite, involves a risk of their spillage and leakage into soils, watercourses and groundwater.

*Social Impacts*
Potential health and safety risks during the construction have been listed below;

- Working at height,
- Moving objects,
- Slips and trips,
- Noise vibration and exposure to dust,
- Hazardous material handlings,
- Unintended collapse,
- Improper management of asbestos,
- Electricity shocks,
- Traffic related risks due to increased traffic, and
- Associated risk of occupational accidents, injuries and diseases.

**Community Health and Safety**

The Project identified the following potential community health and safety impacts due to the construction phase.

- Speed and road damage of transportation and traffic; increased traffic and risk of road traffic accidents and injuries,
- Damage to existing underground public utility cables and pipes and disruption of services,
- Effect of the construction on the accessibility for the community,
- Effect of the construction on vulnerable groups and risk of SEA,
- Increase demand on existing community health and sanitation infrastructure due to influx of temporary workers & camp followers,
- Threat to community culture, safety and security associated with presence of construction workers and business opportunity, and
- Potential damage to underground public utility cables and pipes and disruption of services.

**Traffic**

During the excavation and filling works of water transmission line and network, temporary traffic interruption might occur.

**Loss of Land**

The routes of water transmission line and networks are on existing roads and the areas of water reservoirs are property of ASKI. Therefore, there is no need for expropriation. Absence of land acquisition will be confirmed as part of the detailed design process.

**Cultural Heritage**

There are no known cultural heritage on project area of water transmission line and network.
**Subproject 2-1: Kahramanmaras Northern Districts Integrated Solid Waste Project**

**Environmental Impacts**

**Landscape and Visual**

During construction phase and operation phases of the project temporary and permanent disruptions might occur on landscape. After the landfill area operation is completed, the wastes will be covered with the final cover in accordance with the relevant legislation to minimize disruptions on landscape.

**Noise**

The use of equipment and machinery (excavator, dozer, loader, grader, truck, road roller, street sprinkler etc.) during the construction and operation phases of landfill area, including the excavation and filling works, might cause noise and vibration impacts.

**Ecology and Nature Conservation**

There are one Nature Reserve (Korcoban, Andirin) and 2 Nature Parks (Kapicam, Kahramanmaras and Yavsan, Kahramanmaras) within the boundaries of Kahramanmaras. The important plateau, Sogutova, is between Onikisubat and Goksun, where migratory birds live, endemic vegetation has been found to be very dense, and there are natural cave houses.

Six of the important plant areas (IPA) of Turkey, where approximately 300 rare and endemic plants are listed, are in Kahramanmaras. In addition, a total of 10 threatened habitats have been recorded under the Berne International Convention: fir, cedar, black pine, red pine, juniper and oak forests; steppe and steep rocky plant communities. Two of these important plant areas are located within Goksun borders (Berit Mountain and Keklikoluk IPA), and one is between Goksun and Afsin (Binboga Mountain).

Mountain steppes in Binboga Mountains, which has rich plant diversity, have an important place in terms of endemic plant species. Binboga Mountains is a priority area for plants and hosts many endemic plant species. 44 plant taxon in the field meet the criteria of "important nature area". Among these species, the known world distribution of Muscari macbeathianum, a species of hyacinth, is limited to Binboga Mountains only. Eirenis barani, one of reptile species endemic to Turkey is found in this area. The area is important for plant species as well as for butterfly species such as endangered bavius (Pseudophilotes bavius) and Anatolian hopper (Muschampia proteides).

However, none of the areas listed above is within the project affected area and the closest protected area to the project area is Hancerderesi Wildlife Development Field which is located 10 km southeast.

**Flood Risk**

During the construction phase of the project, flood might occur during heavy rain. Interception channels will prevent that storm water will fall onto vicinity of facility, and the surface water drainage channels will be for preventing that storm water will fall onto the roads.

**Odor Risk**

The formation of odor emissions is inevitable in landfills. However, the adverse impact of odor emissions can be reduced or even eliminated by certain operating principles and by taking measures of disposal.
Impacts on surface water/groundwater

One of the most important problems with respect to environmental pollution in the landfill is the risk of pollution of natural water resources by leakage of leachate from the cracks in the ground. The precipitation water passing through the solid waste masses carries the water-soluble substances in the composition of the solid wastes during the passing period and then causes the water pollution by mixing to the surface water and groundwater.

Harman River is located in approximately 10 km east of the project area. There is no stream flowing within the Turkish EIA study area in the project area. In the Turkish EIA study area, there is no surface water with a significant water collection capacity.

In order to monitor possible leachate leakage to groundwater bodies, the ESIA should describe a groundwater monitoring system.

Social Impacts

Potential health and safety risks during the construction have been listed below;

- Working at height,
- Moving objects,
- Slips and trips,
- Noise vibration and exposure to dust,
- Hazardous material handlings,
- Unintended collapse,
- Improper management of asbestos,
- Electricity shocks,
- Traffic related risks due to increased traffic, and
- Associated risk of occupational accidents, injuries and diseases.

Community Health and Safety

The Project identified the following potential community health and safety impacts due to the construction phase.

- Speed and road damage of transportation and traffic; increased traffic and risk of road traffic accidents and injuries,
- Damage to existing underground public utility cables and pipes and disruption of services,
- Effect of the construction on the accessibility for the community,
- Effect of the construction on vulnerable groups and risk of SEA,
- Increase demand on existing community health and sanitation infrastructure due to influx of temporary workers & camp followers,
- Threat to community culture, safety and security associated with presence of construction workers and business opportunity, and
• Potential damage to underground public utility cables and pipes and disruption of services.

Traffic

During the excavation and filling works of landfill, and also during the transfer of wastes to the landfill temporary traffic interruption might occur.

Loss of Land

The landfill area was expropriated by Union of Municipalities. Thus, will require an Ex-Post Social Audit to be prepared. Goksun transfer station site is allocated to the Municipalities Union from the Regional Directorate of Forestry, and there will be a process for permission to use of these area. Elbistan transfer station site is within the existing Elbistan dumpsite which is located on Treasury land. Additional land may be acquired thus, a RP will be prepared according to RF and details to land requirements of the project will be discussed in the RP.

Loss of Livelihood

Any cases where there are waste pickers who collect recyclable wastes from the wild landfill as a source of income will be investigated during ESIA preparation and proper mitigation measures will be presented.

Cultural Heritage

1st degree archaeological sites are in Yeniyapan Neighborhood Tasligedik (approximately 18 km) and Yogunoluk Neighborhood Camlamaca Highland (approximately 16 km) in Goksun. In case any archaeological chance finds during the construction and operation activities, the work will be suspended immediately.

Subproject 2-2: Kahramanmaras (Centrum) Drinking Water Project

Environmental Impacts

Landscape and Visual

Although, the pipes for drinking water network will be constructed at existing roads, temporary disruptions and/or access problems might occur. In addition, the planned reservoirs will be underground but during the construction phase, also temporary disruptions and/or access problems might occur.

Noise

The use of equipment and machinery during the construction phase of drinking water network and reservoirs, including the excavation and filling works, might cause noise and vibration impacts.

Ecology and Nature Conservation

There are no area in project region under ecological and natural protection.

Flood Risk

Because of the existing storm water drainage system, there are no risks on drinking water network and reservoirs for floods and landslides.
Odor Risk

There is no odor risk during the construction and operation of drinking water network and reservoirs.

Impacts on surface water/groundwater

There are no protected aquifers or surface waters in vicinity of the project area. However, onsite storage and use of materials such as oils, fuels, paints, etc. and wastewater generated from worksite, involves a risk of their spillage and leakage into soils, watercourses and groundwater.

Social Impacts

Potential health and safety risks during the construction have been listed below;

- Working at height,
- Moving objects,
- Slips and trips,
- Noise vibration and exposure to dust,
- Hazardous material handlings,
- Unintended collapse,
- Improper management of asbestos,
- Electricity shocks,
- Traffic related risks due to increased traffic, and
- Associated risk of occupational accidents, injuries and diseases.

Community Health and Safety

The Project identified the following potential community health and safety impacts due to the construction phase.

- Speed and road damage of transportation and traffic; increased traffic and risk of road traffic accidents and injuries,
- Damage to existing underground public utility cables and pipes and disruption of services,
- Effect of the construction on the accessibility for the community,
- Effect of the construction on vulnerable groups and risk of SEA,
- Increase demand on existing community health and sanitation infrastructure due to influx of temporary workers & camp followers,
- Threat to community culture, safety and security associated with presence of construction workers and business opportunity, and
- Potential damage to underground public utility cables and pipes and disruption of services.

Traffic
During the excavation and filling works of drinking water network and reservoirs, temporary traffic interruption might occur.

*Loss of Land*

The routes of drinking water networks are on existing roads and the areas of water reservoirs are property of KASKI. However, two reservoir areas were recently acquired. An Ex-Post social audit will be prepared to assess/evaluate the completed land acquisition process against the requirements of the ESS5 and identify gaps filling measures. Corrective action plan will be developed if substantial gaps are found to ensure material consistency of the past land acquisition with the requirements of the ESS5.

*Cultural Heritage*

There are no known cultural heritage on project area of drinking water project.

*Subproject 2-3: Kahramanmaras (Centrum) Sewerage Project*

**Environmental Impacts**

*Landscape and Visual*

Although, the pipes for sewerage network will be constructed at existing roads, temporary disruptions and/or access problems might occur. In addition, during the construction phase of the planned sewerage pumping stations, also temporary disruptions and/or access problems might occur.

*Noise*

The use of equipment and machinery during the construction phase of sewerage network and sewerage pumping stations, including the excavation and filling works, might cause noise and vibration impacts. Also during the operation, sewerage pumping stations may be the source for noise.

*Ecology and Nature Conservation*

There are no area in project area under ecological and natural protection.

*Flood Risk*

Because of the existing storm water drainage system, there are no risks on sewerage network and sewerage pumping stations for floods and landslides.

*Odor Risk*

There is no odor risk during the construction phase of sewerage network and sewerage pumping stations. However, there might be temporary odor risk because of the unexpected wastewater accumulation during the operation phase of sewerage network and sewerage pumping stations.

*Impacts on surface water/groundwater*

There are no protected aquifers or surface waters in vicinity of the project area. However, onsite storage and use of materials such as oils, fuels, paints, etc. and wastewater generated from worksite, involves a risk of their spillage and leakage into soils, watercourses and groundwater.
Social Impacts

Potential health and safety risks during the construction have been listed below:

- Working at height,
- Moving objects,
- Slips and trips,
- Noise vibration and exposure to dust,
- Hazardous material handlings,
- Unintended collapse,
- Improper management of asbestos,
- Electricity shocks,
- Traffic related risks due to increased traffic, and
- Associated risk of occupational accidents, injuries and diseases.

Community Health and Safety

The Project identified the following potential community health and safety impacts due to the construction phase.

- Speed and road damage of transportation and traffic; increased traffic and risk of road traffic accidents and injuries,
- Damage to existing underground public utility cables and pipes and disruption of services,
- Effect of the construction on the accessibility for the community,
- Effect of the construction on vulnerable groups and risk of SEA,
- Increase demand on existing community health and sanitation infrastructure due to influx of temporary workers & camp followers,
- Threat to community culture, safety and security associated with presence of construction workers and business opportunity, and
- Potential damage to underground public utility cables and pipes and disruption of services.

Traffic

During the excavation and filling works of sewerage network and sewerage pumping stations, temporary traffic interruption might occur.

Loss of Land

The routes of sewerage network are on existing roads and the areas of sewerage pumping stations are properties of KASKI. Absence of land acquisition will be confirmed as part of the detailed design process.

Cultural Heritage
There are no known cultural heritage on project area of sewerage project.

**Subproject 2-4: Ceyhan Basin Wastewater Treatment Plants**

**Environmental Impacts**

*Landscape and Visual*

Andirin WWTP is planned to be located in the forest area at the south of Andirin district. Necessary permissions are taken from Kahramanmaras General Directorate of Forestry. It is required to comply with the commitments given. Landscaping practices should be applied in Andirin WWTP project to barrier the treatment plant and to create a visually pleasing environment.

Goksun WWTP will be constructed on the treasury land, which is an agricultural area. Landscaping practices should be applied in Goksun WWTP project to barrier the treatment plant and to create a visually pleasing environment.

The location of the Ekinozu WWTP is at Ciftlikkale quarter at south of Ekinozu center. Landscaping practices should be applied in Ekinozu WWTP project to barrier the treatment plant and to create a visually pleasing environment.

The land of Caglayancerit WWTP belongs to Caglayancerit Municipality and classified as garden. Landscaping practices should be applied in WWTP project to barrier the treatment plant and to create a visually pleasing environment.

*Noise*

The use of equipment and machinery during the construction phase, including the excavation and filling works, might cause noise and vibration impacts. Also during operation phase, equipment (pumps, blowers etc.) may be the source for noise.

**Ecology and Nature Conservation**

There are one Nature Reserve (Korcoban, Andirin) and two Nature Parks (Kapicam, Kahramanmaras and Yavsan, Kahramanmaras) within the boundaries of the Kahramanmaras province.

Also, Engizek Mountains is located in the southeastern part of Berit Mountain, and northern part of Ahir Mountain and it crosses Ceyhan River to the west.

The distance between Korcoban Nature Reserve Area and the planned WWTP area in Andirin (Boztoprakli) is approximately 20 km. However, Andrin WWTP is located within Andirin Key Biodiversity Area which is recognized by international standards. The qualifying species for this site are a fish species Barbara tschauyssuensis (EN) and Ornithogalum sorgerae which is potentially an endemic plant species. Considering that the wastewater collected from Andirin are directly discharged to Andirin creek currently, the WWTP is expected to have a positive impact on Barbara tschauyssuensis. A detailed field study should be implemented for the presence of Ornithogalum sorgerae and impacts of the WWTP on this species should be assessed within the scope of the site specific environmental and social assessment studies.

Goksun WWTP will be constructed on an agricultural land classified treasury land.

The distance between Engizek Mountains and Ekinozu WWTP is approximately 18 km. However, no significant impact is expected due to construction and operation the WWTP.
The distance between Engizek Mountains and Caglayancerit is approximately 25 km. Also, hyacinth (Hyacinthus orientalis subsp. chionophilus) is in danger of extinction in Boylu Neighborhood (approximately 12 km), Caglayancerit. However, no significant impact is expected due to construction and operation the WWTP.

**Flood Risk**

During the construction phase of wastewater treatment plants, flood might occur during heavy rain.

**Odor Risk**

There is no odor risk during the construction phase of WWTPs. However, during the operation phase odor might be originated from inlet and sludge units of WWTPs.

Andırın WWTP has the closest recipient around 250 meters and Goksun WWTP has around 650 meters. Ekinozu WWTP has the closest recipient around 1,000 m and Caglayancerit WWTP has around 300 m. According to Regulation on Control of Odor published in Official Gazette No. 28712 dated July 19, 2013, in case a complaint, source emission and ambient odor concentrations will be monitored. If regulatory limits are exceeded additional mitigation measures must be taken.

**Impacts on surface water/groundwaters**

There are no protected aquifers or surface waters in vicinity of the project area. However, onsite storage and use of materials such as oils, fuels, paints, etc. and wastewater generated from worksite, involves a risk of their spillage and leakage into soils, watercourses and groundwater. Also, operation of WWTPs will have a positive impact on the water resources because wastewater generated in these districts is currently discharged directly to the receiving environment without any treatment.

**Social Impacts**

Potential health and safety risks during the construction have been listed below;

- Working at height,
- Moving objects,
- Slips and trips,
- Noise vibration and exposure to dust,
- Hazardous material handlings,
- Unintended collapse,
- Improper management of asbestos,
- Electricity shocks,
- Traffic related risks due to increased traffic, and
- Associated risk of occupational accidents, injuries and diseases.

**Community Health and Safety**

The Project identified the following potential community health and safety impacts due to the construction phase.
- Speed and road damage of transportation and traffic; increased traffic and risk of road traffic accidents and injuries,
- Damage to existing underground public utility cables and pipes and disruption of services,
- Effect of the construction on the accessibility for the community,
- Effect of the construction on vulnerable groups and risk of SEA,
- Increase demand on existing community health and sanitation infrastructure due to influx of temporary workers & camp followers,
- Threat to community culture, safety and security associated with presence of construction workers and business opportunity, and
- Potential damage to underground public utility cables and pipes and disruption of services.

**Traffic**

During the excavation and filling works of wastewater treatment plants, temporary traffic interruption might occur.

**Loss of Land**

The routes of sewerage collectors and areas of wastewater treatment plants are required to be expropriated. Additionally, WWTP sites are currently not directly accessible from the main road. Furthermore, there are no nearby electricity sources to be utilized for construction and operation of the wastewater treatment plants. The need for additional land take will require a RP to be developed. Details to the land take requirements of each WWTP site will be provided in the RP to be prepared. Any land based livelihood impacts for the additional land acquisition works will be assessed and land acquisition process will be completed accordingly.

**Cultural Heritage**

There are no known cultural heritage on project area of WWTPs project.

**Subproject 2-5: Elbistan Drinking Water Network Project**

**Environmental Impacts**

**Landscape and Visual**

Although, the pipes for drinking water network will be constructed at existing roads, temporary disruptions and/or access problems might occur. In addition, the planned reservoirs will be underground but during the construction phase, also temporary disruptions and/or access problems might occur.

**Noise**

The use of equipment and machinery during the construction phase of drinking water network and reservoirs, including the excavation and filling works, might cause noise and vibration impacts.

**Ecology and Nature Conservation**

There are no area in project region under ecological and natural protection.
Flood Risk

Because of the natural slope and existing storm water drainage system, there are no risks on drinking water network and reservoirs for floods and landslides.

Odor Risk

There is no odor risk during the construction and operation phases of drinking water network and reservoirs.

Impacts on surface water/groundwater

There are no protected aquifers or surface waters in vicinity of the project area. However, onsite storage and use of materials such as oils, fuels, paints, etc. and wastewater generated from worksite, involves a risk of their spillage and leakage into soils, watercourses and groundwater.

Social Impacts

Potential health and safety risks during the construction have been listed below;

- Working at height,
- Moving objects,
- Slips and trips,
- Noise vibration and exposure to dust,
- Hazardous material handlings,
- Unintended collapse,
- Improper management of asbestos,
- Electricity shocks,
- Traffic related risks due to increased traffic, and
- Associated risk of occupational accidents, injuries and diseases.

Community Health and Safety

The Project identified the following potential community health and safety impacts due to the construction phase.

- Speed and road damage of transportation and traffic; increased traffic and risk of road traffic accidents and injuries,
- Damage to existing underground public utility cables and pipes and disruption of services,
- Effect of the construction on the accessibility for the community,
- Effect of the construction on vulnerable groups and risk of SEA,
- Increase demand on existing community health and sanitation infrastructure due to influx of temporary workers & camp followers,
- Threat to community culture, safety and security associated with presence of construction workers and business opportunity, and
Potential damage to underground public utility cables and pipes and disruption of services.

Traffic

During the excavation and filling works of drinking water network and reservoirs, temporary traffic interruption might occur.

Loss of Land

The routes of drinking water networks are on existing roads and the areas of water reservoirs are property of KASKI. However, two reservoir areas were recently acquired. The need for additional land take is currently unknown. Thus, a RP will be prepared to assess land acquisition impacts and to propose mitigation and compensation measures in line with national regulation and WB ESS5 “Land Acquisition, Restrictions on Land Use and Involuntary Resettlement” requirements. In addition, an Ex-Post Social Audit will be prepared to cover both this sub-project and Elbistan Drinking Water Transmission Line sub-project to address the previous land take carried out by other public authorities.

Cultural Heritage

There are no known cultural heritage on project area of drinking water project.

Subproject 2-6: Elbistan Drinking Water Transmission Line

Environmental Impacts

Landscape and Visual

Although, the pipes for water transmission line will be constructed at existing roads, temporary disruptions and/or access problems might occur. In addition, the planned reservoirs will be underground but during the construction phase, also temporary disruptions and/or access problems might occur.

Noise

The use of equipment and machinery during the construction phase of water transmission line and reservoirs, including the excavation and filling works, might cause noise and vibration impacts.

Ecology and Nature Conservation

There are no area in project region under ecological and natural protection.

Flood Risk

There are no risks on water transmission line and reservoirs for floods and landslides.

Odor Risk

There is no odor risk during the construction and operation phases of water transmission line and reservoirs.

Impacts on surface water/groundwater
There are no protected aquifers or surface waters in vicinity of the project area. However, onsite storage and use of materials such as oils, fuels, paints, etc. and wastewater generated from worksite, involves a risk of their spillage and leakage into soils, watercourses and groundwater.

**Social Impacts**

Potential health and safety risks during the construction have been listed below;

- Working at height,
- Moving objects,
- Slips and trips,
- Noise vibration and exposure to dust,
- Hazardous material handlings,
- Unintended collapse,
- Improper management of asbestos,
- Electricity shocks,
- Traffic related risks due to increased traffic, and
- Associated risk of occupational accidents, injuries and diseases.

**Community Health and Safety**

The Project identified the following potential community health and safety impacts due to the construction phase.

- Speed and road damage of transportation and traffic; increased traffic and risk of road traffic accidents and injuries,
- Damage to existing underground public utility cables and pipes and disruption of services,
- Effect of the construction on the accessibility for the community,
- Effect of the construction on vulnerable groups and risk of SEA,
- Increase demand on existing community health and sanitation infrastructure due to influx of temporary workers & camp followers,
- Threat to community culture, safety and security associated with presence of construction workers and business opportunity, and
- Potential damage to underground public utility cables and pipes and disruption of services.

**Traffic**

During the excavation and filling works of water transmission line and reservoirs, temporary traffic interruption might occur.

**Loss of Land**

The routes of water transmission line under the scope of the project will require expropriation. Thus, a RP will be prepared to assess land acquisition impacts and to propose mitigation and
compensation measures in line with national regulation and WB ESS5 “Land Acquisition, Restrictions on Land Use and Involuntary Resettlement” requirements. This RP will also include measures to monitor and evaluate associated activities carried out by DSI. In addition, an Ex-Post Social Audit will be prepared to cover both this sub-project and Elbistan Drinking Water Network sub-project to address the previous land take carried out by other public authorities.

Cultural Heritage

There are no known cultural heritage on project area of water transmission project.

**Subproject 3-1: Kayseri Wastewater Treatment Plant**

**Environmental Impacts**

*Landscape and Visual*

Although, the construction area is located near the first stage of the existing WWTP, temporary disruptions and/or access problems might occur.

*Noise*

The use of equipment and machinery during the construction phase, including the excavation and filling works, might cause noise and vibration impacts. Also during operation phase, equipment (pumps, blowers etc.) may be the source for noise.

*Ecology and Nature Conservation*

There are no area in project region under ecological and natural protection.

*Flood Risk*

During the construction phase of wastewater treatment plant, flood might occur during heavy rain.

*Odor Risk*

Odor risk during the construction phase will be originated from 1st stage of WWTP in which sludge drying applied in open sludge cake storage area. However, during the operation of 2nd stage with the solar sludge drying odor risk might be eliminated.

*Impacts on surface water/groundwater*

There are no protected aquifers or surface waters in vicinity of the project area. However, onsite storage and use of materials such as oils, fuels, paints, etc. and wastewater generated from worksite, involves a risk of their spillage and leakage into soils, watercourses and groundwater. Also, operation of the 2nd stage of the WWTP will have a positive impact on the water resources.

**Social Impacts**

Potential health and safety risks during the construction have been listed below;

- Working at height,
- Moving objects,
• Slips and trips,
• Noise vibration and exposure to dust,
• Hazardous material handlings,
• Unintended collapse,
• Improper management of asbestos,
• Electricity shocks,
• Traffic related risks due to increased traffic, and
• Associated risk of occupational accidents, injuries and diseases.

Community Health and Safety

The Project identified the following potential community health and safety impacts due to the construction phase.

• Speed and road damage of transportation and traffic; increased traffic and risk of road traffic accidents and injuries,
• Damage to existing underground public utility cables and pipes and disruption of services,
• Effect of the construction on the accessibility for the community,
• Effect of the construction on vulnerable groups and risk of SEA,
• Increase demand on existing community health and sanitation infrastructure due to influx of temporary workers & camp followers,
• Threat to community culture, safety and security associated with presence of construction workers and business opportunity, and
• Potential damage to underground public utility cables and pipes and disruption of services.

Traffic

During the excavation and filling works of wastewater treatment plant, temporary traffic interruption might occur.

Loss of Land

The area of wastewater treatment plant is property of KASKI. Therefore, there is no need for expropriation. Absence of land acquisition will be confirmed as part of the detailed design process.

Cultural Heritage

There are no known cultural heritage on project area of sewerage project.

Subproject 4-1: Aksehir Water Supply Project

Environmental Impacts

Landscape and Visual
Although, the water transmission line and network will be constructed at existing roads, temporary disruptions and/or access problems might occur. In addition, the planned reservoirs will be underground but during the construction phase, also temporary disruptions and/or access problems might occur.

*Noise and Airborne Dust*

The use of equipment and machinery during the construction phase, including the excavation and filling works, might cause noise and vibration as well as airborne dust impacts. In a distance to water transmission line route of the project, beekeepers were observed. The potential environmental and social impacts on beekeepers will be assessed within the scope of environmental and social assessments. If the beekeepers need to be relocated, relevant governmental authority will assist them.

*Ecology and Nature Conservation*

There are no area in project region under ecological and natural protection.

*Flood Risk*

Because of the existing storm water drainage system, there are no risks on water network for floods and landslides. However, during the construction phase of water transmission line and reservoirs, flood might occur during heavy rain.

*Odor Risk*

There is no odor risk during the construction and operation phases of water transmission line, network and reservoirs.

*Impacts on surface water/groundwater*

There are no protected aquifers or surface waters in vicinity of the project area. However, onsite storage and use of materials such as oils, fuels, paints, etc. and wastewater generated from worksite, involves a risk of their spillage and leakage into soils, watercourses and groundwater.

*Social Impacts*

Potential health and safety risks during the construction have been listed below;

- Working at height,
- Moving objects,
- Slips and trips,
- Noise vibration and exposure to dust,
- Hazardous material handlings,
- Unintended collapse,
- Improper management of asbestos,
- Electricity shocks,
- Traffic related risks due to increased traffic, and
- Associated risk of occupational accidents, injuries and diseases.
Community Health and Safety

The Project identified the following potential community health and safety impacts due to the construction phase.

- Speed and road damage of transportation and traffic; increased traffic and risk of road traffic accidents and injuries,
- Damage to existing underground public utility cables and pipes and disruption of services,
- Effect of the construction on the accessibility for the community,
- Effect of the construction on vulnerable groups and risk of SEA,
- Increase demand on existing community health and sanitation infrastructure due to influx of temporary workers & camp followers,
- Threat to community culture, safety and security associated with presence of construction workers and business opportunity, and
- Potential damage to underground public utility cables and pipes and disruption of services.

Traffic

During the excavation and filling works of water transmission line, network and reservoirs, temporary traffic interruption might occur.

Loss of Land

The routes of water networks are on existing roads. However, the routes of water transmission line and the areas of water reservoirs are property of General Directorate of Forestry. Therefore, there will be a process for permission to use of these areas. No loss of private land is anticipated. Absence of land acquisition will be confirmed as part of the detailed design process.

Cultural Heritage

There are no known cultural heritage on project area of water transmission line, network and reservoirs.

Subproject 4-2: Ilgin Wastewater Treatment Plant

The details to the environmental and social risks and impacts will be provided after the completion of feasibility study.

Subproject 4-3: Cumra Wastewater Treatment Plant

The details to the environmental and social risks and impacts will be provided after the completion of feasibility study.

Subproject 5-1: Osmaniye (Centrum) Drinking Water Project

Environmental Impacts

Landscape and Visual
Although, the pipes for drinking water network will be constructed at existing roads, temporary disruptions and/or access problems might occur. In addition, during the construction phase of reservoirs and pumping stations, also temporary disruptions and/or access problems might occur.

**Noise**

The use of equipment and machinery during the construction phase of drinking water network, reservoirs and pumping stations, including the excavation and filling works, might cause noise and vibration impacts.

**Ecology and Nature Conservation**

There are no area in project region under ecological and natural protection.

**Flood Risk**

Because of the existing storm water drainage system, there are no risks on drinking water network, reservoirs and pumping stations for floods and landslides.

**Odor Risk**

There is no odor risk during the construction and operation phases of drinking water network, reservoirs and pumping stations.

**Impacts on surface water/groundwater**

There are no protected aquifers or surface waters in vicinity of the project area. However, onsite storage and use of materials such as oils, fuels, paints, etc. and wastewater generated from worksite, involves a risk of their spillage and leakage into soils, watercourses and groundwater.

**Social Impacts**

**Occupational Health and Safety**

Potential health and safety risks during the construction have been listed below;

- Working at height,
- Moving objects,
- Slips and trips,
- Noise vibration and exposure to dust,
- Hazardous material handlings,
- Unintended collapse,
- Improper management of asbestos,
- Electricity shocks,
- Traffic related risks due to increased traffic, and
- Associated risk of occupational accidents, injuries and diseases.

**Community Health and Safety**
The Project identified the following potential community health and safety impacts due to the construction phase.

- Speed and road damage of transportation and traffic; increased traffic and risk of road traffic accidents and injuries,
- Damage to existing underground public utility cables and pipes and disruption of services,
- Effect of the construction on the accessibility for the community,
- Effect of the construction on vulnerable groups and risk of SEA,
- Increase demand on existing community health and sanitation infrastructure due to influx of temporary workers & camp followers,
- Threat to community culture, safety and security associated with presence of construction workers and business opportunity, and
- Potential damage to underground public utility cables and pipes and disruption of services.

Traffic

During the excavation and filling works of drinking water network, reservoirs and pumping stations, temporary traffic interruption might occur.

Loss of Land

The routes of drinking water networks are on existing roads and the areas of water reservoirs are property of Treasury and General Directorate of Forestry. Therefore, there will be a process for permission to use of these areas. No loss of private land is anticipated. Absence of land acquisition will be confirmed as part of the detailed design process.

Cultural Heritage

There are no known cultural heritage on project area of drinking water project.

Subproject 5-2: Osmaniye (Centrum) Sewerage Project

Environmental Impacts

Landscape and Visual

Although, the pipes for sewerage network will be constructed at existing roads, temporary disruptions and/or access problems might occur.

Noise

The use of equipment and machinery during the construction phase of sewerage network, including the excavation and filling works, might cause noise and vibration impacts.

Ecology and Nature Conservation

There are no area in project area under ecological and natural protection.

Flood Risk
Because of the existing storm water drainage system, there are no risks on sewerage network for floods and landslides.

**Odor Risk**

There is no odor risk during the construction phase of sewerage network. However, there might be temporary odor risk because of the unexpected wastewater accumulation during the operation phase of sewerage network.

**Impacts on surface water/groundwater**

There are no protected aquifers or surface waters in vicinity of the project area. However, onsite storage and use of materials such as oils, fuels, paints, etc. and wastewater generated from worksite, involves a risk of their spillage and leakage into soils, watercourses and groundwater.

**Social Impacts**

Potential health and safety risks during the construction have been listed below:

- Working at height,
- Moving objects,
- Slips and trips,
- Noise vibration and exposure to dust,
- Hazardous material handlings,
- Unintended collapse,
- Improper management of asbestos,
- Electricity shocks,
- Traffic related risks due to increased traffic, and
- Associated risk of occupational accidents, injuries and diseases.

**Community Health and Safety**

The Project identified the following potential community health and safety impacts due to the construction phase.

- Speed and road damage of transportation and traffic; increased traffic and risk of road traffic accidents and injuries,
- Damage to existing underground public utility cables and pipes and disruption of services,
- Effect of the construction on the accessibility for the community,
- Effect of the construction on vulnerable groups and risk of SEA,
- Increase demand on existing community health and sanitation infrastructure due to influx of temporary workers & camp followers,
- Threat to community culture, safety and security associated with presence of construction workers and business opportunity, and
• Potential damage to underground public utility cables and pipes and disruption of services.

Traffic

During the excavation and filling works of sewerage network, temporary traffic interruption might occur.

Loss of Land

The routes of sewerage network are on existing roads. Therefore, there is no need for expropriation. Absence of land acquisition will be confirmed as part of the detailed design process.

Cultural Heritage

There are no known cultural heritage on project area of sewerage project.

4.2.3 Mitigation

A general mitigation plan for water and waste water sub-projects covering afore-mentioned possible impacts of the subprojects is given in Table 5 whereas general mitigation measures for the landfill sub-project is given in Table 6. These should be taken into consideration in the preparation of site specific ESIs/ESMPs for the sub-projects.

**TABLE 5. MITIGATION PLAN FOR WATER AND WASTEWATER SUBPROJECTS**

<table>
<thead>
<tr>
<th>Phase</th>
<th>Issue</th>
<th>Mitigation Measures</th>
<th>Costs</th>
<th>Institutional Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction</td>
<td>Interruptions in transport</td>
<td>Positioning clear warning and information signs around the construction zone. Imposing time constraints (e.g. 7AM to 5PM) for works. Locating and marking alternative roads (roundabouts)</td>
<td>Included in construction costs</td>
<td>Contractor</td>
</tr>
<tr>
<td>Construction</td>
<td>Transport safety</td>
<td>Positioning clear warning and information signs around the construction zone. Imposing time constraints for works. Considering disabled, women, children and people with special needs while locating and marking alternative roads (roundabouts)</td>
<td>Included in construction costs</td>
<td>Contractor</td>
</tr>
<tr>
<td>Construction</td>
<td>Dust</td>
<td>Close or cover trucks for the transport of materials. Spraying water on the ground where dust is generated, disposing of excess material and cleaning the location upon the finalization of works. Protective covers or curtains for zone where the largest amounts of dust are generated.</td>
<td>Included in construction costs</td>
<td>Contractor</td>
</tr>
<tr>
<td>Construction</td>
<td>Noise and Vibrations</td>
<td>Imposing time constraints for works (works in the course of daytime (e.g. 7AM to 5PM). Establish schedules and/or other</td>
<td>Included in construction costs</td>
<td>Contractor</td>
</tr>
<tr>
<td>Phase</td>
<td>Issue</td>
<td>Mitigation Measures</td>
<td>Costs</td>
<td>Institutional Responsibility</td>
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<tr>
<td></td>
<td></td>
<td>forms of specific limitations for works.</td>
<td></td>
<td>Contractor</td>
</tr>
<tr>
<td>Construction</td>
<td>Exhaust gases from equipment/air quality</td>
<td>Imposing time constraints for works (e.g. 7AM to 5 PM).</td>
<td>Insignificant</td>
<td>Contractor</td>
</tr>
<tr>
<td>Construction</td>
<td>Spill outs of fuel, lubricant, antifreeze etc. in the course of performance of works may result in the pollution of ground, surface and subterranean water.</td>
<td>Periodic examination of the condition of vehicles and other machinery and equipment used in the course of the performance of works. Compliant warehousing of fuel and lubricant, and in case of a spill out, isolation and cleaning of the location.</td>
<td>Included in construction costs</td>
<td>Contractor</td>
</tr>
<tr>
<td>Construction</td>
<td>Damage to trees and vegetation may onset in the course of construction</td>
<td>Minimizing the areas requiring the removal of vegetation, and upon finalization of works, replace/restore removed vegetation. Special measures if needed to avoid damage to protected trees or species.</td>
<td>Included in construction costs</td>
<td>Contractor</td>
</tr>
<tr>
<td>Construction</td>
<td>Deposit of excavated soil, erosion, landslides or sedimentation may occur.</td>
<td>Depositing all excess excavated material in a compliant manner into a carefully selected landfill determined by relevant municipal bodies for utility affairs.</td>
<td>Included in construction costs</td>
<td>Contractor</td>
</tr>
<tr>
<td>Construction</td>
<td>There is a possibility of discovering artifacts or other cultural and historical items of value.</td>
<td>Discontinuing all works. Contact responsible authorities. Organizing all necessary measures to protect the location. No works to proceed until official notification is received.</td>
<td>No costs involved</td>
<td>Contractor</td>
</tr>
<tr>
<td>Construction</td>
<td>Periodic interruptions in water supply to neighboring population</td>
<td>Scheduling interruptions in water supply in cooperation with the Water Supply Company and informing the population with the objective of minimizing the negative effect on the population.</td>
<td>Included in construction costs</td>
<td>Contractor and Water Supply Company</td>
</tr>
<tr>
<td>Construction</td>
<td>Excavated and removed material is harmful to environment if it is not disposed of adequately. Especially if the material or waste is dangerous or might be dangerous (such as, for example, asbestos and</td>
<td>All non-dangerous waste and excavated material generated in the course of construction has to be deposited in the landfill and in a manner that is not harmful to the environment. Stone, soil and other materials that may be reused shall be utilized in the procedure of project realization. Materials that cannot be used and dangerous waste should be removed in compliance with entity level regulations.</td>
<td>Included in construction costs</td>
<td>Contractor and Relevant inspection services</td>
</tr>
</tbody>
</table>


<table>
<thead>
<tr>
<th>Phase</th>
<th>Issue</th>
<th>Mitigation Measures</th>
<th>Costs</th>
<th>Institutional Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction</td>
<td>cement pipes, pieces of profiles etc.)</td>
<td>Wastes generated should only be temporarily stored on site in the temporary storage area that is maintained/equipped with appropriate precautions according to the type of wastes, when needed, and wastes should be transported to licensed disposal facilities with licensed transport vehicles appropriate to the type of waste. Information related to the operations in this context should be recorded and records should be kept.</td>
<td>Included in construction costs</td>
<td>Contractor</td>
</tr>
<tr>
<td>Construction</td>
<td>Transportation management of waste (both hazardous and non-hazardous) to the appropriate landfills/disposal sites</td>
<td></td>
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</tr>
<tr>
<td>Construction / Operation</td>
<td>Access to common resources or services may be interrupted due to construction works</td>
<td>Time schedule for all construction works should be communicated with local communities prior to construction. Alternative and secure means to access resources and services should be introduced.</td>
<td>Included construction costs</td>
<td>Contractor</td>
</tr>
<tr>
<td>Construction / Operation</td>
<td>Identification of vulnerable groups impacted by the sub-projects</td>
<td>Certain groups that may be considered vulnerable (people with disabilities, waste pickers, elderly, refugees, certain groups with livelihood dependencies in the project region) should be identified. Their engagement in project planning and implementation should be ensured through consultations as required in the Stakeholder Engagement Plan. Certain vulnerable groups (i.e. waste pickers) might be earning income from the project affected area/land. Ensure that they are informed about the project and can continue to generate income.</td>
<td>Included in ESA study costs</td>
<td>Municipality</td>
</tr>
<tr>
<td>Pre Construction / Construction / Operation</td>
<td>Involuntary Resettlement / Negative impacts on livelihoods of project affected people</td>
<td>Design works to minimize the involuntary land take Preparation of a Resettlement Plan Compensate losses resulted from involuntary resettlement In case of people with special needs (elderly, women, children etc.) or disabled who could be negatively impacted from the construction, ensure that temporary measures for accessibility is put in place</td>
<td>Included in resettlement budget</td>
<td>Municipality</td>
</tr>
<tr>
<td>Construction</td>
<td>Labor Influx (Not all sub-projects may have labor influx)</td>
<td>For subprojects that may have labor influx issues, camp sites should be arranged to properly accommodate workers and meet</td>
<td>Included in construction costs</td>
<td>Municipality/Contractor</td>
</tr>
<tr>
<td>Phase</td>
<td>Issue</td>
<td>Mitigation Measures</td>
<td>Costs</td>
<td>Institutional Responsibility</td>
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</tr>
<tr>
<td>Construction</td>
<td>issues, however projects with long term construction works will require camps sites to be established to accommodate workers. Conflicts may arise between communities and workers)</td>
<td>their needs within the camp site. Workers must be provided with relevant trainings as needed. Workers will sign and receive a training on the Code of Conduct. Nearby communities may be consulted regarding location of the work camp.</td>
<td></td>
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</tr>
<tr>
<td>Construction</td>
<td>Gender Based Violence</td>
<td>Information on GBV/SEA service providers should be shared during public consultations. Project GRM should be designed to receive GBV/SEA grievances anonymously, and addressed in a confidential manner. Relevant Project staff should be trained in order to refer GBV survivors to existing, identified service providers and ensure that they are provided services promptly. Code of Conduct for workers will include prohibition of GBV/SEA.</td>
<td>Included in construction costs</td>
<td>Contractor/ Municipality</td>
</tr>
<tr>
<td>Construction</td>
<td>Occupational health and safety. Construction works can cause accidents that may threaten the health and safety of workers if measures are not taken.</td>
<td>The workers shall be informed about job descriptions, responsibilities and risks about OHS. The workers will be provided working conditions in accordance with the Labor Law (such as wages, working hours, payment for overtime hours, period of rest, social security benefits). The workers will be provided with the necessary personal protective equipment and information on works and occupational safety through regular trainings. Before the construction works starts, a Risk Assessment Report shall be prepared for all works to be carried out and necessary measures shall be taken to avoid related risks. “Emergency Response Plans” shall be prepared for a possible accident and emergency and emergency teams shall be established and drills and training shall be carried out in line with the emergency scenarios.</td>
<td>Included in construction costs</td>
<td>Contractor/ Municipality</td>
</tr>
<tr>
<td>Construction</td>
<td>Community health and safety</td>
<td>The construction area should be fenced to prevent trespassing. Necessary signage and lighting equipment shall be established. Traffic safety shall be established through appropriate management measures. Community should be</td>
<td>Included in construction costs</td>
<td>Contractor/ Municipality</td>
</tr>
<tr>
<td>Phase</td>
<td>Issue</td>
<td>Mitigation Measures</td>
<td>Costs</td>
<td>Institutional Responsibility</td>
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<tr>
<td></td>
<td>informed about transfer of large machinery and equipment. If necessary, emergency drills should be implemented with the participation of the emergency authorities in the area. Design and the construction works of the projects should be in line with the WBG guidelines including the life and fire safety provisions.</td>
<td>Included in the operating costs</td>
<td>Owner/Operator</td>
<td></td>
</tr>
<tr>
<td>Operation</td>
<td>Poor operation may result in inadequate water quality released to the general population</td>
<td>Establish emergency procedures for notification and alerting the public</td>
<td>Included in the operating costs</td>
<td>Operator</td>
</tr>
<tr>
<td>Operation</td>
<td>Environment safety hazards from chlorine storage and use</td>
<td>Establish continuous chlorination control and monitoring, chlorination equipment maintenance procedures, storage procedures, and emergency response procedures. Chlorination plant should have ambient monitoring and locked. Accessible only to authorized staff.</td>
<td>Included in the operating costs</td>
<td>Operator</td>
</tr>
<tr>
<td>Operation</td>
<td>Chlorine and other process chemicals leaks and spills</td>
<td>Establish safe delivery/storage/handling procedures in accordance with material safety data sheets (MSDSs). Immediately contain and clean-up any spilled material.</td>
<td>Included in the operating costs</td>
<td>Operator</td>
</tr>
<tr>
<td>Operation</td>
<td>Process sludge (filtration and flocculation processes) and wastewaters from equipment cleaning</td>
<td>Sludge to be disposed in site approved by municipality. Wastewaters discharged into municipal wastewater collection system</td>
<td>Included in the operating costs</td>
<td>Operator</td>
</tr>
<tr>
<td>Operation</td>
<td>Transportation management of waste (both hazardous and non-hazardous) to the appropriate landfills/disposal sites</td>
<td>Wastes generated should only be temporarily stored on site in the temporary storage area that is maintained/equipped with appropriate precautions according to the type of wastes, when needed, and wastes should be transported to licensed disposal facilities with licensed transport vehicles appropriate to the type of waste. Information related to the operations in this context should be recorded and records should be kept.</td>
<td>Included in the operating costs</td>
<td>Operator</td>
</tr>
<tr>
<td>Operation</td>
<td>Occupational health and safety</td>
<td>The workers shall be informed about job descriptions, responsibilities and risks about OHS. The workers will be provided working conditions in accordance with the Labor Law</td>
<td>Included in the operating costs</td>
<td>Operator</td>
</tr>
</tbody>
</table>
Table 6. Generic Mitigation Measures for Solid Waste Landfills

<table>
<thead>
<tr>
<th>Environmental Component</th>
<th>Possible Impacts</th>
<th>Mitigation Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical Environment</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| Soils and Land          | • Damage to soil structure due to material storage, construction traffic, etc.  
                          • Loss of topsoil during excavation  
                          • Effects of excavation for/disposal of soil and other materials  
                          • Erosion due to uncontrolled surface run-off and wastewater discharge  
                          • Damage to land during construction  
                          • Landslips on embankments, hillsides, etc.  
                          • Contamination of lower layers of soil  
                          | • Protect non-construction areas, avoid work in sensitive areas during highly adverse conditions, provide temporary haul roads as appropriate, restore damaged areas  
                          • Design works to minimize land affected  
                          • Design slopes & retaining structures to minimize risk, provide appropriate drainage, soil stabilization/vegetation cover  
                          • Strip topsoil where necessary, store and replace post construction  
                          • Design drainage and other disposal facilities to ensure soil stability  
                          • Take/dispose of materials from/at approved sites  
                          • Select sites with impermeable soils layers/ use impermeable base material |
| Water Resources         | • Interruption of surface and underground drainage patterns during and post construction, creation of standing water  
                          • Contamination/pollution of resource by construction, human and animal wastes, including fuel & oil, hazardous wastes, wastewater, Contamination of groundwater by leachate.  
                          | • Careful design - maintain natural drainage where possible, provide suitable wastewater drainage, safe/sanitary disposal of hazardous wastes  
                          • Careful design, adequate protection from/control of livestock; agriculture, casual human contact, hazardous materials - fuel (including storage)  
                          • Select sites with impermeable soils layers and no hydrologic connections (such as fractures in rock and inadequate casing and seals on wells) ; use impermeable base materials |
<table>
<thead>
<tr>
<th>Environmental Component</th>
<th>Possible Impacts</th>
<th>Mitigation Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Quality</td>
<td>• Dust, vehicle exhaust and fumes during construction</td>
<td>• Control dust with water, control construction methods and plant, timing of works, vehicle speeds, Appropriate design, training in O&amp;M, safety, Landfill gas collection, landfill organization in small well-defined cells, daily covering of waste and other modern operational techniques</td>
</tr>
<tr>
<td></td>
<td>• Landfill gas, odor</td>
<td></td>
</tr>
<tr>
<td>Acoustic Environment</td>
<td>• Construction noise, vibrations from landfill development</td>
<td>• Time work to minimize disturbance, Use appropriate construction methods &amp; equipment, Restrict through-traffic in residential areas, Careful siting and/or design of plant, provide noise barriers e.g. embankments of waste soil</td>
</tr>
<tr>
<td>Biological Environment</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Natural Habitats</td>
<td>• Disturbance of natural habitats from construction, e.g. dust, noise, poor siting</td>
<td>• Careful siting, alignment, timing of works, Protect sensitive areas within/close to site</td>
</tr>
<tr>
<td>Fauna and Flora</td>
<td>• Loss or degradation during and post construction, especially due to un-seasonal working, changes in environment regimes, (see also above)</td>
<td>• Careful siting, alignment and/or design to minimize impacts, especially for any sensitive/rare species, Select appropriate construction methods, Protect sensitive areas within/close to site</td>
</tr>
<tr>
<td>Social Environment</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grievances</td>
<td>• Concerns and complaints of affected communities</td>
<td>• Consultation on risks and adverse impacts of the project and create opportunities to receive affected communities view on project, Establishment of grievance mechanism to collect and provide timely resolution of affected communities concerns and grievances regarding of the client’s environmental and social performance, Transparent public disclosure to inform each phase of the project through web-site, notice boards, telecommunication tools and public meetings, Establishing well designed and structured public questionnaire to receive feedback from affected communities</td>
</tr>
<tr>
<td>Aesthetics and Landscape</td>
<td>• Local visual impact of completed works and some intrusions into general manmade and natural landscape, loss of trees, vegetation, etc.</td>
<td>• Careful siting and design of works, screening of intrusive items, Replace lost trees, boundary structures, etc., re-vegetate work areas, Careful decommissioning of construction areas and disposal of wastes, Careful site selection, waste compaction and daily application of cover, See also Soil, Land, Air Quality and Acoustic</td>
</tr>
<tr>
<td></td>
<td>• Noise, dust, wastes, etc., during and post construction</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Windblown litter</td>
<td></td>
</tr>
<tr>
<td>Community Health and Safety</td>
<td>• Health and safety hazards during and post construction</td>
<td>• Appoint experienced contractors. Incorporate safety and environmental requirements in contract documents. Provide information on mitigating measures. Capacity building to emphasize need for safe working, good supervision, careful planning and scheduling of work activities, involve communities, fence hazardous areas, Correct design and adequate training in O&amp;M of plant, safety procedures, etc.</td>
</tr>
<tr>
<td></td>
<td>• Health impacts and diseases from hazardous construction materials wastes and from exposure to / handling of landfilled waste</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Explosion at landfill</td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Environmental Component</td>
<td>Possible Impacts</td>
<td>Mitigation Measures</td>
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<tr>
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<td></td>
<td>and adoption of cellular filling; provision of first aid facilities; strict use of protective clothing and gear for landfill workers; regular health check for personnel; Collection of landfill gas</td>
</tr>
<tr>
<td>Gender Based Violence</td>
<td>To cause a social environment that is prone to GBV/SEA</td>
<td>Share information on GBV/SEA service providers during public consultations. Establish Project GRM to receive GBV/SEA grievances anonymously, and addressed in a confidential manner. Train relevant project staff to refer GBV survivors to existing, identified service providers and ensure that they are provided services promptly. Include in Code of Conduct for workers provisions on the prohibition of GBV/SEA.</td>
</tr>
<tr>
<td>Land Acquisition</td>
<td>To cause a physical/economical displacement of Project-affected persons/families.</td>
<td>Identify the land owners and users (both formal and informal) and prepare RP that addresses all land based impacts Include measures and actions in RP to monitor any associated activity operated by third parties Carry out Ex post Audits to identify any gaps between process of completed land acquisition and Bank requirements. Top up any previous land acquisition compensation in case it does not comply with ESS5 as per Ex-post Audit. Ensure continuous stakeholder engagement including vulnerable groups (if any) throughout project implementation Establish project GRM that allows to collect grievances related to land acquisition</td>
</tr>
<tr>
<td>Historical / Cultural Sites</td>
<td>Disturbance/damage/degradation to known and undiscovered sites</td>
<td>Careful siting/alignment of works; special measures to protect known resources/areas Immediately halt work in vicinity of discoveries, pending instructions from relevant authorities</td>
</tr>
</tbody>
</table>

5 ENVIRONMENTAL AND SOCIAL MANAGEMENT PROCESS

A certain process needs to be followed to determine the environmental and social aspects of subproject activities. The stages of this process are defined below. A detailed overview of ILBANK’s capacity in environmental and social management and assessment of the ILBANK’s labor and working conditions are explained in Chapter 6.

Step 1: Screening

Initial screening of subprojects planned to be financed under Component 1 have already been done as given in Section 4.1. In case of modifications and/or revisions in the location, number and design of the subprojects during the project implementation period are made, following screening procedure will apply.

ILBANK, in consultation with the World Bank, will carry out the screening of subprojects. This process will cover an ineligibility assessment and environmental and social categorization of a subproject in line with the ESF. ILBANK will additionally screen each subproject according to the World Bank policies stated under Section 2.8 above, prepare the ESIAs/ESMPs and RPs and ex-post social audits, and share these with the WB as required.
Outcomes of the Turkish EIA Process is another source to identify the impact significance of the project as well as to identify the sensitivity level of Project Area of the Influence (e.g. presence of natural habitats, projected areas etc.). In this process, ILBANK may ask consultants preparing the subproject feasibility reports to carry out an initial assessment of these risks to reach more informed decisions.

ILBANK will also guide the municipality regarding the environmental and social assessment document to be provided (as detailed in Chapter 7 of this document).

ILBANK will submit the proposed screening categories for the subprojects to the World Bank for clearance. The information submitted to the World Bank for this purpose will include the proposed screening category and the key environmental and social issues to be analyzed together with information substantiating the category selection. According to the received information about the selected subprojects, Table 4 provides an estimate for risk categorization.

In cases where several separate investments (components) constitute a subproject, all components will be evaluated as a single subproject. The ESMP prepared for such subproject should combine all the components to be implemented under the subproject. However, the ESMPs of the activities may be prepared separately and works may commence at separate times as long as the components are independent of each other in terms of impact on the social and natural environment. When in doubt, ILBANK will consult with the World Bank environmental and social specialist assigned to the project.

**Step 2: Environmental and Social Assessment**

The type and content of the environmental and social assessment that fulfill the ESSs will depend on the category and special issues associated with the project as discussed above. A part of the information and analysis is likely already available in the EIA or PIF document if the proposed subproject is classified as either an Annex I or and Annex II project according to the Turkish EIA Regulation. Then, according to the category of the subprojects, the Turkish PIFs and EIAs will be used to prepare ESIA and ESMPs. Completing a satisfactory ESIA/ESMP is the responsibility of the concerned municipalities. They may fund the cost of the ESIA/ESMP either from the municipality’s own resources or from the subproject loan. The cost estimates of the site specific ESIA/ESMPs will provide specifics about the responsible agency and relevant costs for each mitigatory/monitoring activities.

ILBANK will perform an overall quality assurance function that the documents prepared meet the World Bank requirements. In reviewing an ESIA or ESMP, ILBANK will also confirm that it is clear, feasible and appropriate.

**Step 3: Public Consultation**

Stakeholder Engagement Plans (SEPs) proportionate to the nature and scale of the proposed subprojects will be prepared as an integral part of ES assessment as given in Section 4.1.

The timing and methods of engagement with stakeholders throughout the life cycle of the project will be described in SEP. Public consultation activities (including public consultation meetings) will be carried out as per SEP to be prepared.

Records of meetings and consultations with stakeholders will be included in the draft and final E&S assessment documents.

Preparing and implementing a satisfactory SEP is the responsibility of the municipalities. They may fund the cost of the SEP either from the municipality’s own resources or from the subproject loan.
ILBANK will perform an overall quality assurance function that the documents prepared meet the WB requirements. In reviewing a SEP, ILBANK will also confirm that it is clear, feasible and appropriate.

**Step 4: World Bank Clearance**

The WB will provide prior review and approval to all subprojects and then provide a no-object for the relevant environmental and social assessment documents. During the implementation of the project, the Bank can mutually agree with ILBANK that ILBANK conducts prior review of the environmental and social assessment documents of Low and Moderate Risk subprojects and the World Bank conducts post review.

The risk categorization of sub-projects are tentatively shared in this ESMF document, but in case of any change in the risk category, ILBANK should discuss the new risk category with the WB and reach consensus.

**Step 5: Incorporation in Works Contracts**

Sub-loan agreement must include requirement to implement the site specific ESIs and ESMPs to be prepared during implementation. The sub-loan agreements will also include the relevant elements for complying with the ESMF and the Environmental and Social Commitment Plan (ESCP), Stakeholder Engagement Plan (SEP), Labor Management Procedure (LMP), Ex-Post Social Audits and RPs. For all subprojects, the site specific ESIs (ESMP section), ESMPs, LMP and RPs will also be attached to the procurement documents and be part of the contract with the contractor selected to carry out the subproject works. These sections include potential impacts that may occur during the set of works in question and measures that the contractor needs to take to mitigate them.

**Step 6: Information Disclosure**

Likewise public consultation, information disclosure activities will also be described in SEP, and will be conducted accordingly.

The draft site specific safeguards documents will be disclosed prior to consultation meetings and after receiving the feedback of the stakeholders, the safeguard documents will be finalized and disclosed in the country. Prior to subproject approval (by the World Bank), ILBANK will submit English versions of the final ESIA, ESMP and RP documents to the World Bank for posting on its external website.

**Step 7: Supervision and Monitoring**

ILBANK will carry out regular supervision of subprojects during construction and operation to ensure that the ESIA reports, ESMPs, SEPs, LMPs and RPs are being duly implemented and that GRMs are accessible and functional. When ILBANK notices any problems in ESIA, ESMP or RP implementation it will inform the relevant municipality and agree with them on steps to rectify these problems. Specifically, for any significant environmental or social incidents (e.g. fatalities, lost time incidents, environmental spills etc.), the municipalities will inform ILBANK in 3 business days, and ILBANK will inform the World Bank about the incident as soon as it is informed. The incident report including root cause analysis, precautions and compensation measures taken, will be submitted to ILBANK in 30 business days and ILBANK will forward the incident report to the World Bank. ILBANK will also report its findings to the World Bank in its biannual project progress report or more frequently, as needed to bring issues to the attention of the World Bank. The World Bank’s Task Team for the project will, on occasion, and as required, also visit project sites as part of project supervision.
6 INSTITUTIONAL ARRANGEMENTS AND CAPACITY FOR ENVIRONMENTAL AND SOCIAL MANAGEMENT IMPLEMENTATION

6.1 Institutional Arrangements

Key actors in the implementation of this framework are the ILBANK PMU and project proponent municipalities/utilities.

The PMU was established under the International Relations Department of ILBANK for the implementation of the Municipal Services Project (MSP), which began preparation in 2003 and was implemented, together with an MSP-AF through 2016. This PMU has continued to implement Sustainable Cities Project (SCP) 1 and 2, and still responsible for the SCP2-AF. The PMU is led by a department head and unit managers and has staff capacity in procurement, FM, safeguards, and technical sectors, particularly water, wastewater, and transport. In terms of technical sectors, other departments of ILBANK support the PMU in project preparation and implementation. ILBANK and its PMU are familiar with and experienced in applying the World Bank guidelines, procedures and standards for both fiduciary (procurement and FM) and safeguards (environmental and social) management. Under SCP1 and SCP2, participating municipalities are responsible for undertaking procurement and contracting activities for their specific subprojects with the technical support and oversight of ILBANK.

A positive legacy of the MSP and SCP has been that ILBANK has developed its project implementation and management capacity substantially. The ILBANK PMU staff were the beneficiaries of the intensive training sessions on World Bank procurement, safeguard implementation and other topics. The experience gained during implementation, together with the efforts of the Government of Turkey to reform ILBANK have made it a more attractive institution for other international investors and laid the groundwork for harmonizing development financing in the sector. The already existing organizational setup and improved project implementation capacity of ILBANK PMU which have been reached through the long collaboration with the World Bank will increase sustainability of the project.

While most of the Metropolitan and Provincial municipalities have experience and dedicated departments to running projects financed by International Financial Institutions (IFIs), institutional capacities of some of the municipalities are still not sufficient for sustaining outcomes. Most of the district municipalities have no capacity to perform IFI funded projects.

In the following the overall roles and capacities of key factors are discussed. The summary of roles and responsibilities is listed in Table 7.

6.1.1 ILBANK PMU

ILBANK PMU will include at least one environmental and one social specialist within the scope of this project to coordinate the implementation of the Environmental and Social Management Framework. The Environmental and Social specialists’ responsibilities will be as follows:

- Carry out screening of the subprojects with regard to E&S risk categorization according to the World Bank’s requirements, when needed.
- Provide municipality E&S consultants\(^3\) guidance on preparation of E&S assessment documents in accordance with the World Bank’s requirements.

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\(^3\) ILBANK considers hiring consultants on behalf of the subproject municipalities for the preparation of site specific safeguard documents.
- Provide municipality officials/municipality E&S consultants with guidance on the World Bank’s E&S assessment standards and procedures, notably consultation and disclosure requirements for subprojects.
- Provide municipality officials/municipality E&S consultants with guidance on the World Bank’s ESSs and safeguard requirements (documentation and procedures) for cultural properties, natural/critical habitats, forests, and international waterways.
- Review E&S assessment documentation, provide written comments to municipality E&S consultants, ultimately provide formal approval of E&S assessment documentation and procedures in accordance with the World Bank’s ESSs and safeguard requirements.
- Ensure that sub-loan documentation includes agreements to implement the ESMF, ESCP, site specific safeguard documents and any other ESSs & safeguard requirements.
- Perform supervision of municipalities’ implementation of ESMF, ESCP, site specific safeguard documents and any other ESSs & safeguard requirements, and document performance, recommendations and any further actions required as part of overall project supervision reporting to the World Bank.
- Be open and responsive to concerns raised by affected groups and local environmental authorities regarding environmental aspects of subproject implementation. Meet with these groups during site visits, as necessary.
- Coordinate and liaise with the World Bank supervision missions regarding environmental and social safeguard aspects of subproject implementation.

6.1.2 Municipalities

The E&S work to be prepared by the municipalities will be mainly conducted by consulting companies of which there is an adequate number in Turkey. Municipalities have been carrying out infrastructure investments and are familiar with Turkish environmental legislation and construction procedures. However, knowledge of the World Bank’s requirements is less common. To help build improve capacity in this regard, ILBANK will organize training workshops to familiarize municipalities and their potential consultants with the WB’s ESSs and safeguard policies.

The municipalities generally have the capacity to properly implement ESMF, ESMP, RF, ESCP, SEP, LMP and subproject-specific E&S documents during the construction and operational phases. Where such capacity is lacking, the municipalities will retain environmental and social specialist consultants to assist them in supervising the works carried out by the contractor and ensuring that the ESMF, ESMP, RF, ESCP, subproject-specific E&S documents are followed adequately. Furthermore, the project may provide institutional strengthening to municipalities through additional training or acquisition of equipment, as needed.

<table>
<thead>
<tr>
<th>Financial Roles</th>
<th>Municipalities</th>
<th>ILBANK</th>
<th>WB</th>
</tr>
</thead>
<tbody>
<tr>
<td>Application Process</td>
<td>Submit Demand Based Applications (in case there is a change in the subproject list)</td>
<td>Review / analyze the applications in order to provide information to the WB (in case there is a change in the subproject list)</td>
<td>Concur the final selection of five participating municipalities (in case there is a change in the subproject list)</td>
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</table>

The capacity strengthening of the participating municipalities will be carried out by ILBANK PMU in close collaboration with the World Bank.
**Preparation Process**

<table>
<thead>
<tr>
<th>Municipalities</th>
<th>ILBANK</th>
<th>WB</th>
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<tbody>
<tr>
<td>Apply the relevant</td>
<td>Coordinate the selected</td>
<td>Assist the ILBANK in</td>
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<td>environmental and</td>
<td>municipalities to ensure</td>
<td>Developing Performance</td>
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<td>social standards that</td>
<td>all the relevant rules and</td>
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<td>are introduced by the</td>
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<td>WB</td>
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<td>through the ILBANK</td>
<td>project</td>
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<td>Organize internal</td>
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**Number of Staff**

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<td>Assign one of each</td>
<td>In addition to</td>
<td>Assist the ILBANK in</td>
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<td>expert/focal point</td>
<td>present team,</td>
<td>establishing monitoring</td>
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<td>listed; Social</td>
<td>a support team</td>
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<td>Expert, Environmental Expert,</td>
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<td>and ESHS experts.</td>
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**Project Roles**

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<td>Overall review of the</td>
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<td>implementation of</td>
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<td>project development</td>
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<td>ESIAs, ESMPs, LMP</td>
<td>monitoring ESMF,</td>
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<td>and SEPs including</td>
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<td>LMP and Grievance</td>
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<td>Grievance Mechanism</td>
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<td>Supervise and</td>
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6.1.3 **Budget**

The capacity strengthening of the participating municipalities/utilities will be carried out by ILBANK PMU in close collaboration with the World Bank. In this regard, ILBANK will organize training workshops to familiarize municipalities and their potential consultants with the World Bank’s ESSs and safeguard policies. The project may also provide institutional strengthening to municipalities/utilities through additional training or acquisition of equipment, as needed. The budget for capacity building activities are covered under Component 2 of the Project.

6.2 **ESMS, Labor and Working Conditions and OHS of ILBANK**

In the following ILBANK’s capacity in environmental and social management is discussed and ILBANK’s labor and working conditions are assessed.

6.2.1 **Area of Operation**

ILBANK is a leading organization that carries out important activities in main areas such as providing finance, developing and executing projects, consultancy and technical services to local authorities, distributing the shares allocated to local authorities from the general budget, making applications with profit-oriented real estate investment projects, carrying out the construction works with the demanded special projects and urban infrastructure projects. Within the scope of the work, water network, water treatment plant, sewerage network, wastewater treatment plant and landfill facilities, paving and road construction activities of local authorities, bridge construction and similar infrastructure projects as well as
superstructure works are also included. In addition to the domestic business areas, ILBANK cooperates highly with various international organizations such as the WB, EIB, JICA and Islamic Development Bank in the field of domestic operations as well as the use of loans and funds abroad.

6.2.2 Environmental and Social Management System

In scope of the Quality Management System Studies, ILBANK has received TS-EN-ISO: 9001-2015 Quality Certification. ILBANK does not have a separate Environmental and Social Management System (ESMS) or set of procedures for ESMS.

As an affiliate to Turkish Ministry of Environment and Urbanization, ILBANK is subject to Turkish national laws and regulations. Therefore, it is responsible for the application of various law and regulations including Environment Law, Expropriation Law, Resettlement Law etc. for the subprojects it finances or signs sub-loan agreements.

Credit evaluation process of ILBANK includes technical, economic and financial assessment of subject loans. However, there is no specific environmental and social assessment criteria defined in the scope of technical assessment.

Projects that ILBANK finances through international financing such as WB, EIB, and JICA are handled by a separate department. This department utilizes key procedural documents for internationally financed investments.

The key procedural documents managing the project’s environmental and social screening, review and monitoring procedures for subprojects are the ESMF and RF which are implemented throughout the lifetime of the international funded projects. For the World Bank-financed projects, these framework documents are integrated into the PAD and Operational Manual of the project and also the core elements are referred in the Loan Agreements. Therefore, ILBANK is fully responsible for the satisfactory implementation of the framework E&S documents. The ESMF and RF additionally require that subproject-specific E&S documents are prepared for the subprojects and these become a part of the sub-loan agreements between ILBANK and sub-borrowers. Through these sub-loan agreements, ILBANK and the World Bank manage and oversee the subprojects in terms of the World Bank E&S requirements.

6.2.3 Environmental and Social Management Capacity

ILBANK’s International Affairs department has experienced staff in technical, procurement, environmental, social and FM related procedures of the WB. ILBANK staff received numerous trainings related to WB’s safeguard operational policies including recent ESF as a part of the ESF Borrower Training roll out program. ILBANK’s safeguards team consists of 2 technical experts - one acting as the environmental focal point and the other as the social development/land acquisition focal point. For each subproject’s environmental and social risk identification and monitoring, ILBANK and the World Bank E&S teams conduct regular meetings, informal discussions and joint meetings with the sub-borrowers as necessary. ILBANK and the World Bank teams also conduct and attend site visits during subproject risk identification and implementation. ILBANK team gained significant experience during the implementation of previous projects financed by the World Bank.

6.2.4 Labor and Working Conditions (as per ESS2)

Occupational Health and Safety
In recent years, Turkey has undergone a reform to improve its national OHS system through adapting a set of international and regional standards into its national level requirements for the prevention occupational risks defined in the ILO Occupational Safety and Health Convention, 1981 (No. 155). The convention, along with the Occupational Health Services Convention, 1985 (No. 161) were both ratified by Turkey in 2005 who is also party to the Labor Inspection Convention, 1945 (No. 81) since 1951. In 2014, Turkey ratified the Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187).

During 2012, a stand-alone Law on OHS (No. 6331) was put into force (20 June 2012). The OHS Law governs workplace environments and industries (both public and private) as well as virtually all classes of employees including part-time workers, interns, and apprentices. The legislation is comprehensive and is generally applicable across all sectors and many industries.

ILBANK has a separate Occupational Health and Safety Policy, however it lacks detailed procedures. As government agency ILBANK is subject to national law on OHS of the Ministry of Family, Labor and Social Security. ILBANK will appoint OHS specialist responsible for the supervision OHS measures implementation, which are required Turkish OHS laws and regulations and ESS2. ILBANK will make sure that supervision consultants and municipalities will also appoint OHS specialist responsible for the supervision OHS measures implementation.

According to the national OHS Law, all employers must notify the Ministry in 3 work days after OHS related incidents. Specifically, for any significant environmental or social incidents (e.g. fatalities, lost time incidents, environmental spills etc.), the municipalities will inform ILBANK in 3 business days, and ILBANK will inform the Bank about the incident as soon as they are informed. The incident report including root cause analysis, precautions and compensation measures taken, will be submitted to ILBANK in 30 business days and ILBANK will forward the incident report to the World Bank.

All ILBANK facilities are equipped with fire safety instruments as required by local regulation. Fire safety plans are also prepared and revised by the responsible department. The staff receives routine training on fire safety and first aid. Regular drills are conducted and reported. For all subprojects, ILBANK will require the sub-borrower municipalities/utilities to ensure that OHS measures are undertaken according to the national OHS law and international best practice.

**Labor and Working Conditions**

Turkey is party to a multitude of ILO conventions, including but not limited to conventions on: equal treatment of employees, gender equality, child labor, forced labor, OHS, right of association and minimum wage. Accordingly, the current Turkish Labor Law (No.4857) is to a large extent consistent with requirements of ESS2.

ILBANK has published a corporate level Human Resource Policy (dated January 4, 2013 in the Official Gazette numbered 28518) that is also in line with national regulations as well as WB requirements. ILBANK employees are civil servants and only OHS, and prohibition child and forced labor ESS 2 provisions applied to civil servants. The HR policy aims to define the employee personal rights including: working hours, leaves (maternity, social events, unpaid), financial rights, working conditions, promotions etc. The policy allows for equal opportunity and employment rights. As ILBANK is a government agency no one under the legal age (18 years) is permitted to work within the institution thus no child labor related issues exist. Cases including unregistered/ uninsured employment of refugees, unequal employment opportunities for women etc. that may be relevant to civil works that ILBANK’s or borrowing municipality’s contractors may encounter, will not be an issue in terms of compliance with ESS2 for ILBANK.
ILBANK is committed to ensure compliance of its own operations and those of any contractors or sub-contractors working at the Project with the provision of the following:

- The Turkish Labour Law
- WB ESS 2 Requirement
- ILBANK Human Resource Policy.

ILBANK will have specific policies in place intended to maximise beneficial impacts of the Project and to minimise or mitigate its potential adverse impacts:

- A Human Resources Policy that prioritises local residents for employment, thus maximising socio-economic benefits in communities closest to operations;
- specific anti-discrimination policies and grievance management procedures.

Key management measures, reporting and monitoring on unregistered/uninsured employment of refugees, unequal employment opportunities for women etc. that may be relevant to civil works that ILBANK’s or borrowing municipality’s contractors will be presented in Labor Management Policy.

**Labor Management Procedures:** ILBANK has published a corporate level Human Resource Policy (dated January 4, 2013 in the Official Gazette numbered 28518) that is also in line with national regulations as well as the WB requirements. The document aims to define the employee personnel rights including; working hours, leaves (maternity, social events, unpaid), financial rights, working conditions, promotions etc. The policy allows equal opportunity and employment rights. As ILBANK is a government agency no one under the legal age (18 years) is permitted to work within the institution thus no child labor related issues will exist. Detailed assessment of labor management within the scope of ILBANK’s current operational procedures has been carried out and presented via the project LMP document in order to verify that Turkish labor law requirements are implemented under the civil works conducted by the contractors.

**Grievance Redress Mechanism for ILBANK Employees:** ILBANK aims to follow-up on customer satisfaction as well as to meet the needs and expectations of its employees through a grievance mechanism. For this purpose, there are Request and Complaint Boxes in various parts of ILBANK buildings. Additionally, requests, grievances and suggestions can be sent to the Quality Management Unit via the utilization of, ‘Send Message’ and ‘Communication’ sections of the Quality Management website. Requests, grievances and suggestions received are sorted every 30 days and presented to management for resolution and response. A report on the grievances received and resolved are listed internally on the grievance system and can be accessed by employees through their own intranet. Contractors are required to establish, maintain and monitor GRM for contracted workers.

**6.3 Grievance Redress Mechanism for Municipalities**

The Grievance Redress Mechanism (GRM) is a process that enables any stakeholder to make a complaint or a suggestion about the way a project is being planned, constructed or implemented. The municipality will establish a transparent and comprehensive Grievance Redress Mechanism before the implementation of any sub-project in order to receive and resolve the affected communities concerns, queries, complaints and grievances about the environmental and social aspects of the project. Some different forms public announcement tools to be used for the establishment of the Grievance Redress Mechanism includes;

- Distribution of leaflets to the public places
• Notice Boards
• Website
• Telecommunication Tools (e.g. hotline)
• Public Meetings

The Grievance Redress Mechanism (sometimes also called Grievance Procedure) will be prepared in compliance with the WB ESF requirements.

The subprojects tackle core municipal investments and services such as water, sanitation and sold waste facilities that citizens expect municipalities to provide.

A grievance redressal and feedback mechanism for the subprojects will be set up to ensure that beneficiary feedback and grievances are addressed by a three-level in-country mechanism consisted of municipalities/utilities, ILBANK and its PMU, and Responsible Court of First Instance, and that the actions taken are reported publically to ensure transparency and accountability. All the municipalities/utilities in Turkey have ‘White Tables’ which are active GRMs for tracking grievances, both online and through a toll-free number.

The subprojects aim to improve the current ‘White Table’ mechanism in the municipalities/utilities by identifying grievances/feedback related to the sub-investments. Any grievance related to a sub-investment financed under the FRIT II Program will be first logged at the municipality/utility level and will be addressed by the PIU satisfactorily within a certain period. If the complainant is not satisfied with the complaint resolution, then the case will be submitted to further levels. There will be a toll-free number and online and SMS channels available for citizens to submit grievances through the ‘White Table’ system regarding the subproject-related grievances.

Although there is no obligation, a Public Grievance Form (see Annex 3) has been prepared for convenience. The selected municipalities will collect all complaints and concerns through the White Table system to achieve and attempt to solve or mitigate related issues within a reasonable timeframe. The municipalities should report the statistics of grievances to the ILBANK. The received complaints/comments will be resolved in a certain period of time as it is set forth in the national law and the White Table System of the relevant municipality.

The White Table System

All municipalities adopted a service called Beyaz Masa (“White Table” in English) in Turkey to collect feedback from citizens. This municipal department was established to collect all the complaints and requests of the local residents and aims to provide possible solutions within the municipal structure for the requested concerns.

Although the White Table system is not considered as a grievance mechanism, it is still acknowledged as a general complaint mechanism that the municipalities adopted within their structure. Therefore, the White Table system can be considered as an additional complaint mechanism for the selected projects since the selected projects are already within the municipality structure.

Citizens can access the White Table by calling the Call Center (Alo 153), internet page or in person. There will be a tracking number given for each comment/complaint that allows following up the status of the report. Alo 153 Call Center intends to provide better quality assistance and faster solutions for concerned residents through the White Table solutions team. There is also an internet page of municipalities, which includes a White Table section that allows the residents to contact public relations experts electronically. Also, the residents can apply their requests in person for an instant solution.
The White Table system provides data management through the feedback of the citizens, however due to some organizational barriers (lack of specific departments and personnel); the system may disable itself to address the received concern/comments. Therefore, this system will be improved as mentioned above and will be tailored for the subproject needs, as necessary.

7 MONITORING AND REPORTING

7.1 Environmental and Social Monitoring

Environmental and social monitoring system starts from the construction phase of the project through the operation phase, verifying the implementation of the mitigation measures in the E&S instruments and assessing their effectiveness, thus enabling the WB and the Borrower to take action when needed.

The monitoring system provides:

- Technical assistance and supervision when needed;
- Early detection of conditions related to particular mitigation measures;
- Follow up on mitigation results; and
- Provide information of the project progress.

Municipalities will monitor the environmental and social impacts of their project activities on a regular basis.

The environmental and social issues included within the mitigation measures will also be monitored and supervised by the appointed specialists through ILBANK.

When ILBANK notices any problems in ESIA, ESMP, LMP, SEP or RP implementation, it will inform the relevant municipality and agree with them on steps to rectify these problems. Specifically for any significant environmental or social incidents, the municipalities will inform ILBANK, and ILBANK will inform the World Bank.

7.2 Reporting to the World Bank

In its biannual project progress reports, ILBANK will include a section titled “Environmental and Social Safeguards” which will summarize the status of ESCP and compliance with ESMF, RF (including the performance related to subproject-specific ESIAs, ESMPs and RPs), LMP and SEP implementation based on its monitoring activities. Any subprojects that may involve land acquisition and which have prepared a RP will also be monitored and updates on RP implementation will be included in the biannual progress reports or submitted separately semi-annually. Such reports will highlight any issues arising from non-compliance with E&S requirements and how it has been/is being addressed from the environmental and social safeguards point of view. The biannual reports will also include account of any stakeholder engagement activities carried out along with a summary of all grievances received and resolved during that reporting period.

8 ESMF DISCLOSURE AND CONSULTATION

The draft ESMF has been disclosed through a stakeholder participation meeting on December 6, 2019 by the ILBANK in order to obtain views and comments of relevant stakeholders.

For the consultation meetings, the following institutions were invited:
In the Stakeholder Consultation Meeting, “Environmental and Social Management Framework (ESMF)” which has been prepared in line with ESF and Turkish Regulation and RF which has been prepared in line with WB ESS5 were discussed. At the end of the meeting, question and answer session was held. Participants list and minutes are prepared for the meeting and is presented in Annex 5.
ANNEXES

ANNEX 1. WORLD BANK’S PROJECT CATEGORIZATION

According to the World Bank’s E&S Policy, projects (including projects involving FIs) are classified into one of four classifications as *High Risk, Substantial Risk, Moderate Risk or Low Risk* taking into account relevant potential risks and impacts, such as the type, location, sensitivity and scale of the project; the nature and magnitude of the potential E&S risks and impacts; the capacity and commitment of the Borrower; and other areas of risks that may be relevant to the delivery of E&S mitigation measures and outcomes.

A project is classified as *High Risk* after considering, in an integrated manner, the risks and impacts of the project, taking into account the following, as applicable:

a. The project is likely to generate a wide range of significant adverse risks and impacts on human populations or the environment. This could be because of the complex nature of the project, the scale (large to very large) or the sensitivity of the location(s) of the project. This would take into account whether the potential risks and impacts associated with the Project have the majority or all of the following characteristics:

   (i) long term, permanent and/or irreversible (e.g., loss of major natural habitat or conversion of wetland), and impossible to avoid entirely due to the nature of the project;
   (ii) high in magnitude and/or in spatial extent (the geographical area or size of the population likely to be affected is large to very large);
   (iii) significant adverse cumulative impacts;
   (iv) significant adverse transboundary impacts; and
   (v) a high probability of serious adverse effects to human health and/or the environment (e.g., due to accidents, toxic waste disposal, etc.).

b. The area likely to be affected is of high value and sensitivity, for example sensitive and valuable ecosystems and habitats (legally protected and internationally recognized areas of high biodiversity value), lands or rights of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities and other vulnerable minorities, intensive or complex involuntary resettlement or land acquisition, impacts on cultural heritage or densely populated urban areas.

c. Some of the significant adverse ES risk and impacts of the project cannot be mitigated or specific mitigation measures require complex and/or unproven mitigation, compensatory measures or technology, or sophisticated social analysis and implementation.

d. There are significant concerns that the adverse social impacts of the project, and the associated mitigation measures, may give rise to significant social conflict or harm or significant risks to human security.

e. There is a history of unrest in the area of the project or the sector, and there may be significant concerns regarding the activities of security forces.

f. The project is being developed in a legal or regulatory environment where there is significant uncertainty or conflict as to jurisdiction of competing agencies, or where the legislation or regulations do not adequately address the risks and impacts of complex projects, or changes to applicable legislation are being made, or enforcement is weak.

g. The past experience of the Borrower and the implementing agencies in developing complex projects is limited, their track record regarding ES issues would present significant challenges or concerns given the nature of the project’s potential risks and impacts.
h. There are significant concerns related to the capacity and commitment for, and track record of relevant Project parties, in relation to stakeholder engagement.

i. There are a number of factors outside the control of the Project that could have a significant impact on the ES performance and outcomes of the project.

A project is classified as **Substantial Risk** after considering, in an integrated manner, the risks and impacts of the project, taking into account the following, as applicable:

a. the project may not be as complex as **High Risk** projects, its ES scale and impact may be smaller (large to medium) and the location may not be in such a highly sensitive area, and some risks and impacts may be significant. This would take into account whether the potential risks and impacts have the majority or all of the following characteristics:
   (i) they are mostly temporary, predictable and/or reversible, and the nature of the project does not preclude the possibility of avoiding or reversing them (although substantial investment and time may be required);
   (ii) there are concerns that the adverse social impacts of the project, and the associated mitigation measures, may give rise to a limited degree of social conflict, harm or risks to human security;
   (iii) they are medium in magnitude and/or in spatial extent (the geographical area and size of the population likely to be affected are medium to large);
   (iv) the potential for cumulative and/or transboundary impacts may exist, but they are less severe and more readily avoided or mitigated than for **High Risk** projects; and
   (v) there is medium to low probability of serious adverse effects to human health and/or the environment (e.g., due to accidents, toxic waste disposal, etc.), and there are known and reliable mechanisms available to prevent or minimize such incidents.

b. The effects of the project on areas of high value or sensitivity are expected to be lower than **High Risk** projects.

c. Mitigatory and/or compensatory measures may be designed more readily and be more reliable than those of **High Risk** projects.

d. The project is being developed in a legal or regulatory environment where there is uncertainty or conflict as to jurisdiction of competing agencies, or where the legislation or regulations do not adequately address the risks and impacts of complex projects, or changes to applicable legislation are being made, or enforcement is weak.

e. The past 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.

f. There are some concerns over capacity and experience in managing stakeholder engagement but these could be readily addressed through implementation support.

A project is classified as **Moderate Risk** after considering, in an integrated manner, the risks and impacts of the project, taking into account the following, as applicable:

a. the potential adverse risks and impacts on human populations and/or the environment are not likely to be significant. This is because the project is not complex and/or large, does not involve activities that have a high potential for harming people or the environment, and is located away from environmentally or socially sensitive areas. As such, the potential risks and impacts and issues are likely to have the following characteristics:
   (i) predictable and expected to be temporary and/or reversible;
   (ii) low in magnitude;
   (iii) site-specific, without likelihood of impacts beyond the actual footprint of the project; and
(iv) low probability of serious adverse effects to human health and/or the environment (e.g., do not involve use or disposal of toxic materials, routine safety precautions are expected to be sufficient to prevent accidents, etc.).

b. The project’s risks and impacts can be easily mitigated in a predictable manner.

A project is classified as **Low Risk** if its potential adverse risks to and impacts on human populations and/or the environment are likely to be minimal or negligible. These projects, with few or no adverse risks and impacts and issues, do not require further ES assessment following the initial screening.
ANNEX 2. SUGGESTED FORMATS

Annex 2A. Indicative Environmental and Social Impact Assessment (ESIA) Outline

(a) Executive Summary
- Concisely discusses significant findings and recommended actions.

(b) Legal and Institutional Framework
- Analyzes the legal and institutional framework for the project, within which the environmental and social assessment is carried out, including the issues set out in ESS1, paragraph 26.
- Compares the Borrower’s existing environmental and social framework and the ESSs and identify the gaps between them.
- Identifies and assesses the environmental and social requirements of any co-financiers.

(c) Project Description
- Concisely describes the proposed project and its geographic, environmental, social, and temporal context, including any offsite investments that may be required (e.g., dedicated pipelines, access roads, power supply, water supply, housing, and raw material and product storage facilities), as well as the project’s primary suppliers.
- Through consideration of the details of the project, indicates the need for any plan to meet the requirements of ESS 1 through 10.
- Includes a map of sufficient detail, showing the project site and the area that may be affected by the project’s direct, indirect, and cumulative impacts.

(d) Baseline Data
- Sets out in detail the baseline data that is relevant to decisions about project location, design, operation, or mitigation measures. This should include a discussion of the accuracy, reliability, and sources of the data as well as information about dates surrounding project identification, planning and implementation.
- Identifies and estimates the extent and quality of available data, key data gaps, and uncertainties associated with predictions.
- Based on current information, assesses the scope of the area to be studied and describes relevant physical, biological, demographic, and socioeconomic conditions, including any changes anticipated before the project commences.
- Takes into account current and proposed development activities within the project area but not directly connected to the project.

(e) Environmental and Social Risks and Impacts
- Takes into account all relevant environmental and social risks and impacts of the project. This will include the environmental and social risks and impacts specifically identified in ESS2 – 8, and any other environmental and social risks and impacts arising as a consequence of the specific nature and context of the project, including the risks and impacts identified in ESS1, paragraph 28.

(f) Mitigation Measures
- Identifies mitigation measures and significant residual negative impacts that cannot be mitigated and, to the extent possible, assesses the acceptability of those residual negative impacts.
- Identifies differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable.

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5 This analysis will also include labor, health, and safety laws.
- Assesses the feasibility of mitigating the environmental and social impacts; the capital and recurrent costs of proposed mitigation measures, and their suitability under local conditions; the institutional, training, and monitoring requirements for the proposed mitigation measures.
- Specifies issues that do not require further attention, providing the basis for this determination.

(g) Analysis of Alternatives
- Systematically compares feasible alternatives to the proposed project site, technology, design, and operation -including the "without project" situation- in terms of their potential environmental and social impacts.
- Assesses the alternatives’ feasibility of mitigating the environmental and social impacts; the capital and recurrent costs of alternative mitigation measures, and their suitability under local conditions; the institutional, training, and monitoring requirements for the alternative mitigation measures.
- For each of the alternatives, quantifies the environmental and social impacts to the extent possible, and attaches economic values where feasible.

(h) Design Measures
- Sets out the basis for selecting the particular project design proposed and specifies the applicable EHSGs or if the ESHGs are determined to be inapplicable, justifies recommended emission levels and approaches to pollution prevention and abatement that are consistent with GIIP.

(i) Environmental and Social Management Plan (ESMP) (see Annex 2B)

(j) Appendices
- List of the individuals or organizations that prepared or contributed to the environmental and social assessment.
- References-setting out the written materials both published and unpublished, that have been used.
- Record of meetings, consultations and surveys with stakeholders, including those with affected people and other interested parties. The record specifies the means of such stakeholder engagement that were used to obtain the views of affected people and other interested parties.
- Tables presenting the relevant data referred to or summarized in the main text.
- List of associated reports or plans.
Annex 2B. Indicative Environmental and Social Management Plan (ESMP) Outline

An ESMP consists of the set of mitigation, monitoring, and institutional measures to be taken during implementation and operation of a project to eliminate adverse environmental and social risks and impacts, offset them, or reduce them to acceptable levels. The ESMP also includes the measures and actions needed to implement these measures. The Borrower will (a) identify the set of responses to potentially adverse impacts; (b) determine requirements for ensuring that those responses are made effectively and in a timely manner; and (c) describe the means for meeting those requirements.

ESMPs will be prepared as a stand-alone document. The content of the ESMP will include the following:

(a) Mitigation

- The ESMP identifies measures and actions in accordance with the mitigation hierarchy that reduce potentially adverse environmental and social impacts to acceptable levels. The plan will include compensatory measures, if applicable. Specifically, the ESMP:

  (i) identifies and summarizes all anticipated adverse environmental and social impacts (including those involving land acquisition, involuntary resettlement workers and community health and safety, vulnerable groups and cultural heritage or);
  (ii) describes with technical details each mitigation measure, including the type of impact to which it relates and the conditions under which it is required (e.g., continuously or in the event of contingencies), together with designs, equipment descriptions, and operating procedures, as appropriate;
  (iii) estimates any potential environmental and social impacts of these measures; and
  (iv) takes into account, and is consistent with, other mitigation plans required for the project (e.g. for involuntary resettlement, labor, stakeholder engagement or cultural heritage).

(b) Monitoring

- The ESMP identifies monitoring objectives and specifies the type of monitoring, with linkages to the impacts assessed in the environmental and social assessment and the mitigation measures described in the ESMP. Specifically, the monitoring section of the ESMP provides (a) a specific description, and technical details, of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions; and (b) monitoring and reporting procedures to (i) ensure early detection of conditions that necessitate particular mitigation measures, and (ii) furnish information on the progress and results of mitigation.

(c) Capacity development and training

- To support timely and effective implementation of environmental and social project components and mitigation measures, the ESMP draws on the environmental and social assessment of the existence, role, and capability of responsible parties on site or at the agency and ministry level.

- Specifically, the ESMP provides a specific description of institutional arrangements, identifying which party is responsible for carrying out the mitigation and monitoring measures (e.g. for operation, supervision, enforcement, monitoring of implementation, remedial action, financing, reporting, and staff training).

- To strengthen environmental and social management capability in the agencies responsible for implementation, the ESMP recommends the establishment or expansion of the parties responsible, the training of staff and any additional measures that may be
necessary to support implementation of mitigation measures and any other recommendations of the environmental and social assessment.

(d) Implementation schedule and cost estimates

- For all three aspects (mitigation, monitoring, and capacity development), the ESMP provides (a) an implementation schedule for measures that must be carried out as part of the project, showing phasing and coordination with overall project implementation plans; and (b) the capital and recurrent cost estimates and sources of funds for implementing the ESMP. These figures are also integrated into the total project cost tables.
ANNEX 3. STAKEHOLDER ENGAGEMENT FRAMEWORK

INTRODUCTION

The main objective of the Project is to improve municipal infrastructure in municipalities affected by the Syrian refugee influx in Turkey. Its specific objective is to improve access to, and quality of municipal services, including water supply, wastewater and solid waste services in targeted municipalities. Proposed activities to achieve the project objectives will focus on the construction and rehabilitation of water supply infrastructure investments, wastewater systems, and solid waste facilities. It will also include technical assistance for project management, supervision and capacity building to the project implementing agencies at the central and regional level. Envisaged results include: (i) Improved access to safely managed water supply services; (ii) Reduction in non-revenue water; (iii) Improved access to safely managed wastewater collection / sewerage services; (iv) Improved wastewater treatment; (v) Improved solid waste disposal in targeted municipalities; and (vi) Strengthened institutional capacity to manage municipal services in municipalities and utilities.

While undertaking works and activities to meet the objectives stated above, ILBANK and the borrowing municipalities will also aim to ensure the continuous involvement and participation of their stakeholders throughout the project life.

Rationale for a Stakeholder Engagement Framework (SEF)

This Stakeholder Engagement Framework (SEF) forms a part of the Environmental and Social Management Framework (ESMF) of the “Improving Municipal Services in Refugee Affected Areas in Turkey” Project (hereinafter referred to as “the Project”). This SEF that outlines the engagement approach and methodology that the investing municipalities will adapt for their projects has been prepared by ILBANK as a guiding document during the preparation of sub-project specific SEPs. The SEF provides a framework to support the establishment of a continuous engagement process between municipalities and those who potentially would be impacted, or have any kind of interest in the Project (stakeholders). The process ensures that a sound engagement approach is set in order to increase active participation and involvement of all project stakeholders throughout the entire life of the Project (design, preconstruction, construction, operation, decommissioning).

Objectives of the SEF

The goal of this SEF is to improve and facilitate decision making and create continuous dialogue with project-affected people (PAP) and other stakeholders in a timely manner, and to ensure that these groups are provided equal and sufficient opportunity to voice their opinions and concerns that may influence Project decisions. This SEF will also serve as a base for the Stakeholder Engagement Plans (SEPs) that will be prepared for each subproject once the investments are determined.

The key objectives of the SEF can be summarized as follows:

- To establish a systematic approach to stakeholder engagement that will help municipalities identify stakeholders, and to build and maintain a constructive relationship with all identified stakeholders, especially project-affected parties
- To assess the level of stakeholder interest and support for the project and to enable stakeholders’ views to be taken into account in project design and environmental and social performance
- To promote and provide means for effective and inclusive engagement with project affected parties throughout the Project life-cycle on issues that could potentially create an impact
- To ensure that technically and culturally appropriate project information on environmental and social risks and impacts is disclosed in a timely, understandable, accessible format
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow municipalities to respond to and manage such grievances
Effective stakeholder engagement promotes a “social licence” to operate and is founded on mutual trust, respect and transparent communication between investing municipalities and its stakeholders. A well-established stakeholder engagement process improves decision making as well as increasing project performance by managing costs and risk, avoiding conflict, improving corporate policy, providing continuous feedback to management on project implementation and impacts, and managing stakeholder expectations.

**STAKEHOLDER ENGAGEMENT PROCESS**

Based on this SEF, municipalities will need to prepare a separate SEP for each of their sub-projects. In doing so, they will follow the below mentioned process.

**Stakeholder Identification**

Once the sub-projects’ footprints are determined, the primary step in stakeholder engagement process will be to identify the Project’s stakeholders. In identifying the stakeholders, municipalities will also determine the needs and expectations for engagement, including their priorities and objectives in relation to the Project. After the identification of stakeholders, municipalities will choose the best engagement method and tool to engage with each stakeholder.

There may be individuals and groups who may find it more difficult to participate in project activities and those who may be differentially or disproportionately affected by the Project due to their marginalized or vulnerable status. Therefore, it is important that municipalities investigate the impacts of their sub-projects on different stakeholders. The engagement method should be tailored to each identified stakeholder ensuring their involvement in the project.

The SEP will be a living document that will be updated and revised according to changing circumstances of the sub-projects. Stakeholders identified in the design phase of a project may change during implementation and therefore will need to be updated accordingly.

Stakeholders will be identified on a continuing basis by the determination of:

- Various stakeholder categories that may be affected by, or be interested in, the sub-project;
- Specific individuals (including vulnerable), groups, and organizations within each of these categories taking into account:
  - The area of influence; geographical location where anticipated impacts (both positive and negative) will occur, and therefore the localities within which people and businesses could be affected
  - The nature of the impacts that could arise and therefore the types of national/local government entities, NGOs, academic and research institutions and other bodies who may have an interest in these issues

Depending on the magnitude of impact and influence of the sub-project on the stakeholders, the frequency and intensity of the engagement method will proportionally increase. Hence, it is important that the project specific SEPs are prepared in line with the available ESMF/ESMPs and/or RF/RPs to determine the level of environmental and social impacts on relevant stakeholders. These project documents will provide information on vulnerable groups (if any) such as women, elderly, disabled, refugees, seasonal workers etc. that all need to be considered during the preparation of SEPs. All engagement methods selected should be culturally acceptable and appropriate for each of the different stakeholder group targeted.

**Methods for Stakeholder Engagement**

A variety of engagement techniques can be utilized to engage and consult with stakeholders, as well as to gather information from and deliver information to stakeholders.

The level of impact, in addition to the needs and concerns of the stakeholders will found the basis of the tools and methods selected to engage with certain groups. Anticipated engagement methods and means of application for possible stakeholders of the Project are presented in Table 1 below. These
methods and tools are generic and need to be revised accordingly once the project specific SEPs are prepared.

**Table 1. Engagement Methods to be Employed Under the Project**

<table>
<thead>
<tr>
<th>Engagement Method</th>
<th>Application of the Method</th>
<th>Possible Stakeholder</th>
</tr>
</thead>
</table>
| Correspondences (Letters, Phone, Emails) | - Information sharing (in particular technical) on project requirements and impacts  
- Invitations to meetings and key events during project implementation  
- Arrangements for obtaining permits, licences, transfer and allocation of project land  
- Information and data requests that will be utilized for project implementation | Other relevant state authorities and government officials, NGOs, local government, academia, national and local media and organisations/agencies |
| One-on-one meetings         | - Information collection on an individual basis allowing to speak freely about sensitive issues  
- Establishing personal connections with key actors | Representatives of relevant state authorities and government officials, NGOs, local government, academia, and organisations/agencies, contractors and consultants |
| Formal meetings             | - Collective information sharing on project requirements and impacts  
- Receiving comments, feedback, views and perception of project from a group of high level stakeholders  
- Establishing relations with high level stakeholders | Other relevant state authorities and government officials, NGOs, local government, academia, and organisations/agencies, national and local media |
| Public consultation meetings| - Information sharing (especially non-technical) to a large group of stakeholders, especially communities  
- Receiving comments, feedback, views and perception of project from a group of stakeholders  
- Collecting grievances and concerns related to the project  
- Establishing relations with high level stakeholders | Impacted communities and groups, local NGOs, local government, businesses and organisations/agencies |
| Face to face interviews     | - Baseline data collection on an individual basis with impacted PAPs  
- Monitoring of project environmental and social impacts and activities on an individual basis  
- Establishing relations on an individual basis | Project affected people, workers |
| Focus group discussions     | - Information sharing on a specific topic to a certain group of people including vulnerable groups  
- Receiving comments, feedback, views and perception of project from a certain group  
- Collecting grievances and concerns related to the project from a certain group  
- Monitoring of project environmental and social impacts and activities on a certain group  
- Establishing relations with certain groups | Certain target groups, vulnerable groups |
| Project / Municipality / ILBANK website | - Information sharing and progress updates  
- Disclosure of ESIA, ESMP, RF, RP, Ex post social audit and other relevant project documentation  
- Announcements of key events, dates and published documents | Impacted communities and PAPs, national and local media, academia, NGOs, businesses and organisations/agencies |
| Social media (Facebook, Twitter, Instagram accounts, WhatsApp groups) | - Non-technical information sharing and progress updates  
- Announcements of key events, dates and published documents | Impacted communities and PAPs, national and local media, academia, NGOs, businesses and organisations/agencies |
| Project information brochures/leaflets | - Sharing brief project information to provide regular update | Impacted communities and PAPs, businesses and organisations/agencies |
### Engagement Method | Application of the Method | Possible Stakeholder
---|---|---
| | - Inform on certain issues such as land acquisition, land entry and exit, project time schedule etc.  
- Dissemination of site specific project information |  

#### Timing of Stakeholder Engagement

Timely application of the stakeholder engagement activities that will be conducted during ESIA/ESMP and RP implementation are critical in supporting the Project’s risk management process, especially during the early identification and avoidance/management of potential negative and positive impacts that will allow for a cost-effective project design.

Stakeholder engagement is an on-going process that spans throughout the life of the project starting from planning and design, construction, operation until the end of decommissioning.

Project specific SEPs that will be prepared by the municipalities will be expected to present a stakeholder engagement strategy that covers the entire life span of the project, showing the timing and frequency of engagement activities that will be carried out under each project phase.

#### Institutional Arrangements for Stakeholder Engagement

The management, coordination and implementation of the project specific SEPs and its integral tasks will be the responsibility of dedicated team members within the relevant municipality. In administering the SEP, the municipalities will be responsible of:

- Preparing and updating the content of the draft SEP (in line with this SEF) and sharing it with ILBANK for final approval
- Assigning dedicated staff for the implementation and monitoring of engagement activities
- Preparing relevant engagement tools and material committed under the project specific SEP and their timely application and/or dissemination
- Approving and facilitating all stakeholder engagement events and disclosure of material to support stakeholder engagement events
- Keeping records of all engagement activities and to monitor and report to ILBANK on a regular basis (through providing inputs on engagement activities in the semiannual progress reports)
- Ensuring that all feedback received from tasks carried out are incorporated in relevant documents and reflected in the decision-making process
- Maintaining the stakeholder database.

#### Key Principles of Stakeholder Engagement

The SEF and relevant SEPs will ensure that the following key principles are applied to all engagement activities:

- The timing and number of engagement activities is designed to maximize stakeholder involvement while avoiding disruption of the ‘daily business’ of local stakeholders in particular as well as avoiding ‘consultation fatigue’
- All engagement activities are in line with project specific SEP schedule and parallel to the commitments made in ESIA/ESMPs and also RPs if any.
- Ensure that all engagement activities are recorded and findings/feedback that require any action to be taken is incorporated to relevant documents, shared with responsible parties and followed up in a timely manner
- Ensure that every engagement activity is culturally appropriate, sufficient and disseminated in a timely manner with equal access to all relevant stakeholders allowing for their increased participation and feedback
- Project specific SEPs are updated as required during the project life cycle.
SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

ILBANK has organized a public consultation meeting to disclose the Project’s ESMF (including this SEF) and RF documents on December 6, 2019. Brief summary of the meeting is presented under Section 8 of the ESMF.

GRIEVANCE MECHANISM

A Grievance Redress Mechanism (GRM) will be developed by the municipalities for potential use by both external and internal stakeholders (workers etc.). The aim of the GRM will be to timely resolve any project related grievance that may result in the complainant being worse off due to project activities.

Each borrowing municipality will form a grievance system and assign designated staff for its management. Once the system is established it will be made public and introduced to all stakeholders providing equal and easy access to all. Depending on the magnitude of impact generated by the project and the need of different municipalities; a hotline may be established or contact numbers of responsible officers can be provided to the affected people and communities.

Every grievance received through various means (forms, phone, through staff etc.) employed by the municipality will be recorded to a grievance allowing for timely response and action to be taken by the responsible party assigned for resolution of the grievance. For easy use, two grievance forms; namely Grievance Register Form and Grievance Close Out Form have been provided as annex to this SEF.

Generally, all municipalities adopt a service called “White Table” which aims to collect complaints and requests from the local residents. Although the White Table system is not considered as a grievance mechanism, it is still acknowledged as a general complaint mechanism that is utilized by municipalities. The Project will aim to enhance and improve the current application of the White Table mechanism through project specific arrangements. Any grievance related to a sub-project will be first logged at the municipality level and will be addressed by designated staff within a pre-defined period. There will also be other means of logging grievances such as a toll-free number, online forms, social media channels of the municipalities that have been made available for citizens to submit grievances. If not to the municipalities directly, a complainant can always lodge a grievance through Ilbank’s own GRM also made publicly known and available. If the complainant is not satisfied with the complaint resolution, then the case will be submitted to further levels such as the court of first instance. Table 2 provides a three level GRM system that the Project will adopt.

<table>
<thead>
<tr>
<th>Level</th>
<th>Authority</th>
<th>Method</th>
<th>Procedures</th>
<th>Response Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>Municipality (hotline, White Table, e-mail, online forms etc.)</td>
<td>In person, by phone, by writing, electronically - in all cases grievances will be recorded in a grievance logbook.</td>
<td>Municipality will assign a Community Liaison Officer to lodge and manage grievance and feedback mechanism of the sub-project. Grievance will be assessed. If needed will be examined on-site Response / redress of grievance will be communicated to petitioner. If cannot be resolved, Level 2 or Court of First Instance depending on grievance.</td>
<td>2 weeks</td>
</tr>
<tr>
<td>2.</td>
<td>ILBANK in Ankara (phone number, address, e-mail)</td>
<td>By phone, by writing, electronically</td>
<td>Lodging of grievance will be confirmed. Grievance will be assessed by the municipality and ILBANK will be informed. Response / redress of grievance will be communicated to petitioner by the municipality. ILBANK will monitor</td>
<td>4 weeks</td>
</tr>
</tbody>
</table>
WORLD BANK GRIEVANCE REDRESS SYSTEM

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB’s Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB’s independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank’s attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank’s corporate Grievance Redress Service (GRS), please visit http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service. For information on how to submit complaints to the World Bank Inspection Panel, please visit www.inspectionpanel.org

MONITORING AND REPORTING

Monitoring and evaluation of the stakeholder engagement process is of utmost importance to ensure timely and effective decision making for Project implementation.

Each project specific SEP will include a timeline for engagement activities as well as defining responsible parties for the implementation and monitoring of engagement activities. Monitoring of engagement activities can be realized through identifying key performance indicators that reflect the objectives of the SEP, and the specific tasks and actions. A series of sample key performance indicators by Project Phase are presented in Table 3.

Table 3. Sample Key Performance Indicators by Project Phase

<table>
<thead>
<tr>
<th>Project Phase</th>
<th>Indicator</th>
<th>Verification Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>Design and Planning</td>
<td>Preparation of sub project specific SEPs</td>
<td># of SEPs prepared</td>
</tr>
<tr>
<td></td>
<td>Public consultation meetings carried out to provide</td>
<td># of meetings conducted</td>
</tr>
<tr>
<td></td>
<td>Project information and introduce project documents</td>
<td># and type of participants attended</td>
</tr>
<tr>
<td></td>
<td>such as ESIA/ESMPs and/or RF/RPs</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Designated staff appointed to carry out SEP</td>
<td>Names of staff appointed</td>
</tr>
<tr>
<td></td>
<td>Establishment of Project GRM</td>
<td>Operational GRM</td>
</tr>
<tr>
<td>Construction</td>
<td>Raising awareness on Project activities</td>
<td># of meetings held</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Decrease in the</td>
</tr>
<tr>
<td></td>
<td></td>
<td># of grievances received due to construction</td>
</tr>
<tr>
<td>Operation</td>
<td># of grievances received due to operation</td>
<td>Decrease in the</td>
</tr>
<tr>
<td></td>
<td></td>
<td># of grievances received due to operation</td>
</tr>
</tbody>
</table>

As per the reporting requirements set in the ESMF and RF of the Project, the municipalities will be responsible of reporting to ILBANK semiannually on project progress. Sub-project specific progress reports will also include a section on stakeholder engagement activities conducted during the specified period. Stakeholder engagement activities can be presented in a tabular format listing the tasks undertaken, the time of action, responsible party, target group and the purpose of the action will be presented. The municipalities will inform ILBANK on any changes made in SEP (if any).
# ANNEX TO SEF

## SAMPLE GRIEVANCE AND GRIEVANCE CLOSE OUT FORM

### Grievance Form

<table>
<thead>
<tr>
<th>Reference No</th>
<th>Name – Surname</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><em>The complainant shall hold the right to remain anonymous (Although giving name and address is not compulsory, it should be kept in mind that during the feedback process regarding the grievance some problems may occur due to lack of information)</em></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Please mark how you wish to be contacted</th>
<th>Please provide details for your preferred communication</th>
</tr>
</thead>
<tbody>
<tr>
<td>E-mail</td>
<td></td>
</tr>
<tr>
<td>Telephone</td>
<td></td>
</tr>
<tr>
<td>Mail</td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Province/Town/Settlement</th>
<th></th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Date</th>
<th></th>
</tr>
</thead>
</table>

### Category of the Grievance

1. On assets/properties impacted by the project
2. On infrastructure damages (roads, sewage system or water resources etc)
3. On decrease or complete loss of sources of income
4. On environmental issues (ex. pollution)
5. On employment process
6. On traffic, transportation and other risks
7. Other (Please specify): |

### Description of the Grievance

What did happen? When did it happen? Where did it happen? What is the result of the problem?

### What would you like to see happen to resolve the problem?

<table>
<thead>
<tr>
<th>Signature:</th>
<th>Date:</th>
</tr>
</thead>
</table>
# Grievance Close Out Form

<table>
<thead>
<tr>
<th>Grievance closeout number:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Define immediate action required:</td>
<td></td>
</tr>
<tr>
<td>Define long term action required (if necessary):</td>
<td></td>
</tr>
<tr>
<td>Compensation Required?</td>
<td>[ ] YES [ ] NO</td>
</tr>
</tbody>
</table>

## CONTROL OF THE REMEDIAL ACTION AND THE DECISION

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<th>Stages of the Remediate Action</th>
<th>Deadline and Responsible Institutions</th>
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## COMPENSATION AND FINAL STAGES

This part will be filled and signed by the complainant after s/he receives the compensation fees and his/her complaint has been remediated.

Notes:

Name-Surname and Signature of the Complainant

Title-Name-Surname and Signature of the Representative of the Responsible Institution/Company

Date.../.../.....
### ANNEX 5. STAKEHOLDER CONSULTATION MEETING MINUTES AND ATTENDANCE LIST

#### QUESTIONS AND ANSWERS:

<table>
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<tr>
<th>INSTITUTION</th>
<th>QUESTION/COMMENT</th>
<th>ANSWER</th>
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<tbody>
<tr>
<td>General Directorate of Land Registry and Cadastre</td>
<td>Have the new resettlement locations been determined on the land? If resettlement will take place, the locations should be registered. In this circumstance, expropriation is needed. By considering social impacts, unregistered public land should be identified and registered officially. Public institutions, which are responsible for registration, are General Directorate of National Estate and General Directorate of Land Registry and Cadastre. Predetermination of non-registered public areas/lands or lands which have not yet been surveyed and necessity of registration by virtue of General Directorate of National Estate and General Directorate of Land Registry and Cadastre have been mentioned.</td>
<td>It has been expressed that necessary registration processes are on-going; a considerable part has been completed. Moreover, it has been underlined that these issues will be pursued in “Resettlement Action Plans” by ILBANK. In order to clarify the resettlement issue, the representative of General Directorate of Land Registry and Cadastre has been informed at the end of the meeting that physical displacement has not been foreseen within the scope of this project.</td>
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| KASKİ                                           | The Expropriation Law in practice allows for majority of the international practices to be applied. Tough there are gaps that need to be bridged, major challenges are centred around the following three requests:  
- Dissatisfaction of PAPs towards compensation fees of land.  
- PAPs who see expropriation as a last resort  
- PAPs who object to the value of land.  
The most challenging problem is reported as illegal occupation of lands. These people have never reported to officials and have gained unfair income. | According to our expropriation legislation, no payment is made to informal users. However, WB requirements suggest paying compensation to locals who earn a livelihood from public land, even for non-legal use. Also, it has been mentioned that this application is not available in Expropriation Law but implemented in the BTC Project by a special law particularly for this project. WB Consultants have expressed that national law had been nearly harmonized with international requirements but there are still gaps to be considered such as compensation measures for informal users. One of the gaps is the replacement cost; while Turkish Law applies depreciation cost for structures, according to the WB ESSs, depreciation is not considered in the calculation of compensations. As municipalities stated that land expropriation payments are even five time higher than the real value, WB Consultants have remarked that these prices should be verified and documented in the official documents. The importance of documentation has also been emphasized. Moreover, it has been stated that payments for crops have also been made while assessing the value of land according to Turkish legislation but land to land compensation should also be considered to cash compensation. |
| Municipalities                                   | Municipalities have remarked that local residents have planted trees and harvested | WB Consultants have indicated the validity of “cut-off date” policy. Thus, they |

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| Kemal Şirikçi  
| KASKİ  
| (Kahramanmaraş) | The language of reports to be prepared was inquired. | It has been stated that the reporting to ILBANK should be in English. On the other hand, it has been mentioned that public announcements/information sharing, and public documents need to be made in Turkish-English-Arabic. |
| crops in order to enhance price of their lands. In this case, they asked which actions can be taken? | mentioned that any process on land will be invalid after this date. Experts of land registry and cadastre have mentioned that there have been some revisions on relevant regulations. However, there is no update on private lands. Moreover, WB Consultants have suggested that one of the solutions to this could be taking of the satellite image of the project area on the cut-off date as an evidence of existing structures on the lands to be expropriated. |
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