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# SOCIAL ENTREPRENEURSHIP, EMPOWERMENT AND COHESION IN REFUGEE AND HOST COMMUNITIES IN TURKEY PROJECT (SEECO, P171456)

## ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

25 JANUARY 2021



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## ABBREVIATIONS AND ACRONYMS

BP	Bank Procedure
CIP	Community Implementing Partner
CSO	Civil Society Organization
DA	Development Agency
DG-ECHO	Directorate General for European Civil Protection and Humanitarian Aid Operations
DGMM	Directorate General for Migration Management
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
ES	Environmental and Social
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
ESSN	Emergency Social Safety Net
EU	European Union
FRIT	European Union's Facility for Refugees in Turkey
GRM	Grievance Redress Mechanism
ILO	International Labour Organization
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
MoEU	Ministry of Environment and Urbanization
MoFLSS	Ministry of Family, Labor and Social Services
MoIT	Ministry of Industry and Technology
MSME	Micro, Small and Medium Enterprise
NGO	Nongovernmental Organization
OHS	Occupational Health and Safety
OP	Operational Policy
PIU	Project Implementation Unit
POM	Project Operations Manual
PT	Project Team
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Management Plan
SGM	Subgrants Manual
SME	Small and Medium Enterprise
TA	Technical Assistance
TAC	Temporary Accommodation Center
TRC	Turkish Red Crescent



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UNDP  
UNHCR  
WFP

United Nations Development Programme  
United Nations Refugee Agency  
World Food Programme



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## 1. PROJECT DESCRIPTION

Turkey is both a transit and reception country for migrants and refugees and, globally, the country hosts the highest number of refugees.<sup>1</sup> As a result of the crisis in its southern border with Syria, Turkey has been hosting an increasing number of refugees and foreigners seeking international protection. In addition to hosting more than 3.6 million Syrians<sup>2</sup>, who are under temporary protection, there are an estimated 400,000 asylum seekers and refugees from other nationalities. The country's refugee response has been progressive and provides a model to other countries hosting refugees, but the magnitude of the refugee and migrant influx continues to pose challenges for displaced persons, host communities, and the country at large.

As of August 2019, nearly 3.5 million Syrian refugees (97 percent) were living among host communities. The four provinces of Istanbul, Sanliurfa, Hatay and Gaziantep host the largest concentration (1.8 million) of Syrian refugees with nearly all refugees in the country living in privately-arranged accommodation.

In 2016, Turkey established the Emergency Social Safety Net (ESSN) program to address the basic needs of its refugee population, with financial support from the European Union's Facility for Refugees in Turkey (FRiT) through its humanitarian arm, the Directorate General for European Civil Protection and Humanitarian Aid Operations (DG-ECHO). While the ESSN program has supported Syrians through a critical transitional stage, a major constraint of this program is its limited sustainability in ensuring that ESSN beneficiaries continue to use the skills and benefits that they have acquired to maintain and improve their economic self-reliance. The Government of Turkey has planned to phase out the ESSN in order to move toward more developmental approaches that help refugees pursue an independent socio-economic life in Turkey.<sup>3</sup>

The vulnerabilities of the refugee population targeted by the ESSN are multiple and complex. 76 percent of ESSN refugees are poor, compounded by other types of vulnerabilities. First, a proportion of refugees suffer from food insecurity and face constraints in children's access to education, which bear enduring human capital consequences. Second, there is an intensive use of 'costly' coping strategies, which cripple ESSN households' longer-term livelihood capacity.

The Government's ESSN Exit Strategy explicitly notes: (1) entrepreneurship will be an important avenue to promote inclusion, with social entrepreneurship as a feature of economic mainstreaming of displaced Syrians; (2) the importance of moving from social assistance for refugees to forms of support focused on both refugees and host communities; (3) the negative impacts of the exclusion of women as active participants of the local economy; and (4) the importance of social cohesion to meet peace/stability goals as well as economic goals.

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<sup>1</sup> DGMM. 2019. This document uses the term refugee regardless of country of origin, although Syrians are under temporary protection status, and non-Syrians under international protection law.

[http://www.goc.gov.tr/icerik6/temporary-protection\\_915\\_1024\\_4748\\_icerik](http://www.goc.gov.tr/icerik6/temporary-protection_915_1024_4748_icerik)

<sup>2</sup> The terms "Syrians" and "refugees" are used in terms of sociological context and widespread daily use, and independent of the legal context in Turkey and Turkish Law. Turkey is a party to the 1951 Refugee Convention and 1967 Protocol. Turkey retains a geographic limitation to its ratification of the 1951 UN Convention on the Status of Refugees, which means that only those fleeing as a consequence of "events occurring in Europe" can be given refugee status. Syrian nationals, as well as stateless persons and refugees from Syria, who came to Turkey due to events in Syria after 28 April 2011 are provided with temporary protection.

<sup>3</sup> The program is implemented nationwide in partnership with the Ministry of Family, Labor and Social Services (MoFLSS), the World Food Programme (WFP), and the Turkish Red Crescent (TRC).



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Despite the highly responsive efforts of the Turkish government, there are emerging concerns regarding social cohesion in a number of affected communities. In 2017 and 2018, measures of social cohesion in Turkey within communities hosting Syrians revealed declines in trust, acceptance, and belonging, with some variance for location. Women refugees are particularly disadvantaged, often placing their children at greater risk. A World Bank assessment (2017) sheds light on the change in intra-household dynamics and patriarchal codes within displaced Syrian's communities in Turkey. The pressure to work often affects women and children, specifically forcing families to exploit child labor.

Despite the challenges, Syrian refugees are creating jobs and participating in the Turkish economy by establishing their own businesses – five Syrian businesses are established each working day. There is emerging evidence that, despite the struggle to obtain employment, displaced Syrians in Turkey are contributing positively to the local economy and to the creation of new enterprises. As of June 2019, there were 15,160 companies in Turkey with at least one Syrian refugee partner. Estimates put total Syrian capital invested in Turkey at US\$1.0-1.5 billion.<sup>4</sup>

The proposed project of 39.5 Million EUR aims to support women and youth within refugee and host communities' transition into sustainable economic opportunities and increased social cohesion through the micro-grant support provided by the selected 5 Development Agencies (DAs) covering 11 provinces (Adana, Mersin, Gaziantep, Adiyaman, Kilis, Mardin, Hatay, Osmaniye, Kahramanmaraş, Diyarbakir, and Sanliurfa) (see Figure 1), where vulnerable refugee reside the most. The project (i) expands economic opportunities for mostly women refugee and host communities through support for social enterprises and vital livelihoods facilities; (ii) improve social cohesion among refugees and host communities through enterprise development and participatory engagement in livelihoods facilities.



**Figure 1:** Proposed Target Provinces and Development Agencies

<sup>4</sup> Building Markets. 2018. 'Turkish-Syrian Business Partnerships: A Nascent Opportunity'. Available online at: [https://buildingmarkets.org/sites/default/files/pdm\\_reports/20180612\\_syrian-turkishbusinesspartnerships\\_en\\_1.pdf](https://buildingmarkets.org/sites/default/files/pdm_reports/20180612_syrian-turkishbusinesspartnerships_en_1.pdf), retrieved June 24, 2019



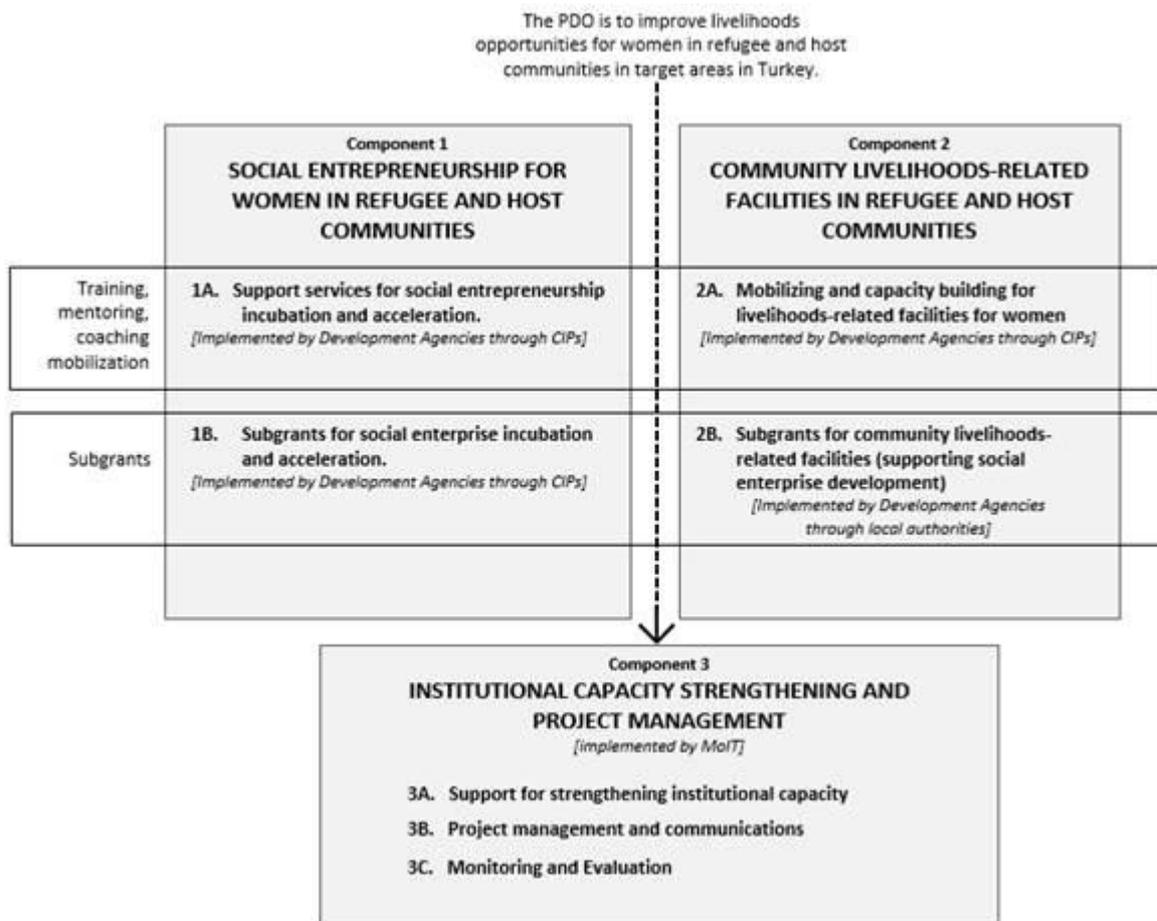
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### 1.1. Project Development Objective

The Proposed Development Objective is to improve women’s livelihoods and social cohesion for refugees and host communities in target areas in Turkey.

### 1.2. Project Components

The project will be implemented through three components, as described in **Figure 2**. The social enterprise, livelihood facilities and institutional support components together meet economic, social and institutional goals, namely: (i) to expand economic opportunities for mostly women refugee and host communities through support for social enterprises and vital livelihoods facilities; (ii) to improve social cohesion between refugees and host communities through social enterprise development and participatory engagement in livelihoods facilities; and (iii) to enhance institutional capacities of the Ministry of Industry and Technology (MoIT), Development Agencies (DAs), municipalities, other relevant government agencies, and local development partners to support women’s social enterprises.



**Figure 2: Project Diagram**

**Component 1: Social Entrepreneurship for Women and Youth in Refugee and Host Communities** (ECDF, EUR 26.0 million) will finance activities to support social entrepreneurship in refugee and host communities. The project defines a social enterprise to include profit-making businesses that *prioritize*



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*social or environmental impact while reinvesting profit primarily in their mission and/or benefitting target social groups through employment or other activities that may increase their income.*

Subcomponent 1A will finance support services for social entrepreneurs.

Subcomponent 1B will support the incubation of an estimated 3720 new enterprises in the 11 target provinces (in 5 DAs). These “incubation sub-grants” will be eligible to those beneficiaries that entered subcomponent 1A, successfully completed the soft skills and business development training/mentoring and produced a viable business plan for a social enterprise. The incubation sub-grants will have a ceiling of EUR 10,000.

Subcomponent 1B will also support an estimated 320 existing social enterprises. These “acceleration sub-grants” will be made available to existing social enterprises that have entered the support services program to support their market expansion and growth. Social enterprise beneficiaries will submit business growth plans outlining their business needs/challenges and present solutions in a viable business plan for financing. These acceleration sub-grants will have the added benefit of creating additional jobs for refugees and host communities, especially for women. The acceleration sub-grants will have a ceiling of EUR 25,000, although much lower sub-grants are anticipated.

## **Component 2: Community livelihoods-related facilities in refugee and host communities** (ECDF EUR 9.5 million)

**Subcomponent 2A: Mobilization and capacity building for livelihoods-related facilities for women (supporting social enterprise development):** Investment in facilities and services in urban, peri-urban and rural areas of the target provinces in Turkey are generally planned and implemented by municipalities. Turkish citizens engage in this via the city councils, although this engagement varies by province and district. The aim of Subcomponent 2A is to establish a platform for target beneficiaries (women and youth from refugee and host communities) to participate in the identification of needs and community-led planning and prioritization of livelihood investments. Through this process, the groups targeted under Component 1 will be empowered and mobilized to genuinely engage in decision-making over the financing of local livelihoods facilities needed to support their social enterprises, and the refugee and host community members will be facilitated to merge ideas and work together to this end.

**Subcomponent 2B: Sub-grants for community livelihoods-related facilities (supporting social enterprise development):** This subcomponent will through grants finance community subprojects for women’s livelihoods. The primary goal of this subcomponent is to establish livelihood facilities and services to enhance the success of livelihoods-related activity in Component 1. The facilities (such as marketplaces, kindergartens and kitchens) not only help increase economic activity, but will also help enhance social cohesion by providing a place where refugees and host communities interact, and provide a broader reach of the project in refugee and host communities.

The sub-grant distribution formula to each province will ensure that sufficient resources are allocated in order for the investments to have impact in the urban neighborhoods/subdistricts/mahalle and beneficiary communities. Accordingly, a minimum allocation for facilities will be EUR 100,000 and the maximum will be set at EUR 300,000. Depending on subproject types and costs, approximately 70 facilities would be created if the average.

**Component 3: Institutional Capacity Strengthening and Project Management** (ECDF, EUR 4.0 million)  
While the capacity of the implementing agencies in the project is high and there is much experience in the DAs of the development of SME programs, there is less experience of establishing and expanding social enterprises for women, supporting entrepreneurship among refugees and host communities or



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developing the support system for women to succeed. The project will therefore aim to support the development of knowledge and skills of these concepts and the planned project processes.

**Sub-component 3A: Support for Strengthening Institutional Capacity** will finance a set of activities aimed at building the capacity of key stakeholders including MoIT, Development Agencies, municipalities, local authorities and other national and local state and non-state stakeholders. At the outset, a capacity needs assessment will be carried out and an institutional capacity development action plan will be prepared, and the subcomponent will subsequently finance trainings, workshops and conferences to build skills and understanding of the principles, design, implementation and monitoring of social enterprise support programs.

#### **Sub-component 3B: Project Management, Coordination and Communications.**

This component will finance project management, capacity needs assessment of implementing agencies and subsequent training, stakeholder engagement activities, project monitoring and evaluation, plus studies and midterm and completion reviews. Beneficiary Feedback Mechanism (BFM) will also be designed and funded under this component, which will provide a formal channel for feedback from communities on any matter concerning the Project, and specifically collect, process and address safeguards complaints through a structure reaching from the local to national level.

#### **Subcomponent 3C. Monitoring and Evaluation**

This subcomponent will provide assistance to carry out monitoring and evaluation of activities implemented under the Project, including data collection and preparation of reports, in support of the project results framework under the Facility for Refugees in Turkey. It will support the development of a relevant and robust project M&E system involving MoIT, the TDAs and CIPs.

### **1.3. Implementing Agency**

The borrower and implementing agency of the project is the MoIT and it will delegate its responsibilities for the implementation of Components 1 and 2 to five regional DAs (i.e. Cukurova Development Agency, Dicle Development Agency, Dogu Akdeniz Development Agency, Ipekyolu Development Agency, and Karacadag Development Agency). MoIT has the mandate to determine policies toward science, technology and innovation in line with industrial, economic, social development and national security policies and strategies. Through DAs and other financing mechanisms, MoIT provides financial and technical support to entrepreneurs and SMEs.

### **1.4. Purpose of Environmental and Social Management Framework**

The subprojects to be financed under Component 1 and Component 2 of the project are not identified at this stage but will be during the course of the project, and the risks and impacts can therefore not be determined until the sub-project details have been identified. Therefore, an environmental and social management framework (ESMF) has been prepared, which sets out the principles, rules, guidelines and procedures to assess the environmental and social risks and impacts. It contains measures and plans to reduce, mitigate and/or offset adverse risks and impacts, along with estimated budget, assessment of the MoIT and implementing agencies (DAs) capacity to manage environmental and social risks. The ESMF also comprises a Negative List of characteristics which will render a sub-project ineligible (see Annex A). Finally, this ESMF will be part of the commitment agreement between the MoIT and DAs, and between DAs and subgrant applicants. The ESMF will also be part of the subgrants manual of DAs.



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## 2. REGULATORY FRAMEWORK FOR ENVIRONMENTAL AND SOCIAL ASSESMENT

**National Environmental Legislation:** Turkish environmental regulations were developed in line with national and international initiatives and standards, and some of them have been revised recently to be harmonized with the EU Directives in the scope of pre-accession efforts of 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 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 labor issues (see Annex B).

**The Turkish Regulation on EIA:** The Regulation on Environmental Impact Assessment (EIA) 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 are screening, public consultation, scoping, disclosure and supervision.

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. The project proponent presents a project dossier 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”. The project proponent prepares the EIA Report in accordance with the project specific format provided and submits to the MoEU for review and evaluation by the commission. 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. 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; 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



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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).

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. 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 EIA Regulation does not require public consultation meeting for Annex-II projects.

**National Laws on Social Impacts:** Although the Turkish EIA Regulation does not entirely meet the requirements of international standards in terms of social impacts, there are various legal arrangements for managing several social impacts. The following are laws and regulations applicable to 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

### ***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 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. Labor Inspectorate, which is a part of the Ministry of Labor, Family and Social Services, enforces labor and OHS laws, and conducts regular OHS and labor audits.

**Circular 2020/12 of MoEU on COVID-19 Measures in the Management of Personal Hygiene Equipment (such as Single use Masks, Gloves) Wastes:** This circular was published on April 07, 2020 and defines the minimum requirements to be considered in the accumulation, collection, transportation, temporary storage and delivery to waste processing facilities of personal hygiene equipment wastes. Also, the **waste management guidance of the MoH** mentions that; (i) Wastes of a



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patient possibly or definitely diagnosed COVID-19 are recognized as infectious waste in hospital environment and disposed to medical waste box”, (ii) Wastes of a patient possibly or definitely diagnosed COVID-19 who is monitored at home should be collected separately through the protective preventions required, kept in double bags and disposed to domestic waste box, (iii) The wastes of the contacted individuals (contacted with the patients who have possibly or definitely COVID-19, individuals coming from a country or province where the disease is common) who are observed in collective accommodation places (i.e. dormitory) for 14 days should be disposed to domestic waste bag, (iv) Disposable masks and gloves used for protection in the society should be disposed to domestic waste bag, (v) There is not any information about disposal of the wastes of COVID-19 patients following a certain waiting period in the guidelines of important healthcare organizations including WHO, CDC and ECDC.

**National Pandemic Plan:** The National Pandemic Plan was published in 2006 as a part of the preparation for influenza pandemic in Turkey. The plan was molded into its final form as “The Pandemic Influenza National Preparedness Plan” after being updated in the light of experiences gained during the 2009 Influenza A pandemic along with the regulations and recommendations made by WHO during the process. The Pandemic Influenza National Preparedness Plan was prepared under the coordination of the Ministry of Health, General Directorate of Public Health in collaboration with other institutions and organizations. The Plan was published in the Official Gazette as the Presidency Circular 2019/5. The Pandemic Influenza National Preparedness Plan has been prepared to provide an outline of the minimum elements needed to be prepared, as well as to ensure optimal readiness. The plan aims to secure the continuity of public services and to reduce the transmission of the pandemic strain, number of patients related to the pandemic, hospitalization and deaths due to the disease, and the socioeconomic burden formed by the pandemic. Provinces were requested to generate “Provincial Pandemic Influenza Preparedness and Action Plans” in line with the Pandemic Influenza National Preparedness Plan. In compliance with this request, 81 Provincial Health Directorates prepared drafts of “Provincial Pandemic Influenza Preparedness and Action Plans”. The committee evaluated these plans, and provinces were asked to complete their preparations in accordance with the feedbacks given on a provincial basis. Even though the Pandemic Influenza National Preparedness Plan has been prepared for Pandemic Influenza, this plan is adaptable to the New Corona Virus Disease (COVID-19) caused by a virus that transmits via respiratory droplets, similar to Influenza.<sup>5</sup>

**COVID-19 Risk Assessment and COVID-19 Guideline:** Scientific Board for COVID-19 conducted the “COVID-19 Risk Assessment” on January 22, 2020. In addition, “COVID-19 Guideline and Case Report Form” was prepared in the same meeting. The “COVID-19 Disease Guideline” includes general information about the infection, case definitions and information on case management, infection control and isolation, patient care and treatment. The guideline also included information for the people who will be travelling to the countries with COVID-19 cases. This guidance has provided a standardized approach all over the country towards suspected cases. The first version of the guideline was published on January 24, 2020. Following the scientific developments and WHO guidance/recommendations, it is constantly updated and published on the website of the Ministry of Health together with COVID-19 posters, leaflets, frequently asked questions and algorithms.<sup>6</sup> Last update of the guideline has been made on June 01, 2020 as of June 18, 2020. Turkey’s COVID-19 Responsiveness Plans are in line with the WHO strategic action plan for pandemic influenza (WHO,

<sup>5</sup> Turkish Journal of Medical Sciences, COVID-19 Outbreak Control, Example of Ministry of Health of Turkey, Demirbilek et al., accepted/published online: 18.04.2020

<sup>6</sup> Turkish Journal of Medical Sciences, COVID-19 Outbreak Control, Example of Ministry of Health of Turkey, Demirbilek et al., accepted/published online: 18.04.2020



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2007). **Guidance to COVID-19 Outbreak Management and Working** has also been prepared by Scientific Advisory Board and it provides measures to be taken at workplaces such as shopping malls, worksites, etc. Last update of the guideline has been made on June 17, 2020 as of June 18, 2020.

### ***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 great extent consistent with international labor standards and the Bank's ESS2 requirements.

**The Labor Act of 2003** covers all work relations in Turkey, with the exception of sea and air transport activities, enterprises carrying out agricultural and forestry work who employ less than 50 employees, family-run construction work related to agriculture, works and handicrafts performed in the home, domestic work, sportsmen, people in rehabilitation, enterprises with three or less employees working as tradesmen or producing small handicraft.

**Regulation on the Principles and Procedures for the Employment of Children and Young Persons 2004 (RPEC)** contains the requirements for employing children under 18 and the types of works prohibited for children to perform. Covers all children under 18 that are also covered by the Labor Act (Art. 2). This excludes children working in activities outside of the Labor Act's scope.

**Regulations on Overtime and Extra Hours 2004 (REOH)** - applies to all workers and works covered by the Labor Act (Art. 1).

**Regulations on Working Conditions at Night for Women Workers 2013 (RWCNW)** - applies to all women older than 18 and working in nightshifts and spells out specific requirements and restrictions regarding night work by female workers (Art. 1, 2).

**Law on the Work Permit for Foreigners 2003 (LWPF)** - Applies to foreigners working in Turkey and regulates the attribution of work permits (Art. 1, 2). Foreign workers must obtain a work permit to be legally employed (L WPF 4). The Labor Act only applies to legally employed foreigners. Employers have to notify the Ministry of Labor and Social Security of any foreigners they employ within 15 days of the beginning of employment (LWPF 18). Employers failing to declare foreign workers have to pay a fine. Where foreigners work without a valid work permit, both worker and employer may be fined (LWPF 21).

### **3. THE WORLD BANK'S ENVIRONMENTAL AND SOCIAL STANDARDS**

The World Bank's Environmental and Social Standards (ESSs) set the requirements to be met by Borrowers with respect to the identification and evaluation of social and environmental risks and impacts associated with projects supported by the WB through Investment Project Financing. The ten ESSs establish the standards that the Borrower and the project will meet through the project life cycle.

The present project will finance support services, capacity building and under component 1b) provide small grants for social enterprise incubation and acceleration (EUR 10,000- EUR 25,000), and under component 2b) grants for community livelihood related facilities (EUR 100,000 - EUR 300,000).



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The project will exclude funding to any activity listed under Annex A and ones that involve any type of land acquisition relevant to ESS5 (Annex C provides a Land Acquisition Checklist to be filled out by MoIT and/or DAs prior to approval of any sub project, that no businesses or activities of the businesses require land take), adverse impact on biodiversity, natural or critical habitat (relevant for ESS6) or cultural heritage (ESS8), involves transaction in hazardous substance or illegal substance. Real estate purchase and major construction works will also be excluded, as will any the subproject which trigger WB policy on Projects on International Waterways (OP/BP 7.50), or if a sub-project would be classified as High Risk or Substantial Risk.

Based on the planned scope of the present project, the WB's ESSs relevant to the project are 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;
- ESS10: Stakeholder Engagement and Information Disclosure.

In accordance with the ESSs, the project will also apply the relevant requirements of the Environment, Health and Safety (EHS) Guidelines. When 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.

### ***ESS1: Assessment and Management of Environmental and Social Risks and Impacts***

The activities to be financed through Component 1 will mainly promote entrepreneurs for starting up new, or expanding socially and environmentally-oriented businesses. The project will have positive social impacts by contributing to the livelihoods and empowerment of women and youth in refugee and host communities and improving or at least preventing disruptions in social cohesion. The project aims to assist women and youth to engage in microbusinesses in sectors such as agricultural production, food production, small manufacturing, textile and garments, arts and crafts, social services and clean products. The environmental risks associated with the activities under Component 1 of the project could be waste management, energy consumption, wastewater generation, OHS risks such as slips and falls, cuts and burns, water and food quality which are anticipated to be minor in scale and can be easily mitigated through national regulatory requirements and use of Good International Industry Practices. The social enterprises and people to be employed by them are the project beneficiaries. These social enterprises shall follow applicable national labor and employment legislation, including those related to child and forced labor, and measures provided in the ESMF. Potential risks related to child and forced labor will be mitigated with procedures included in the ESMF, and Project's Labor Management Procedures (LMP), with more details to be provided in the Sub-Grant Manual (SGM) which will explicitly exclude any activities which involve child and forced labor.

Under Component 2, the project will provide subgrants for community livelihoods-related facilities and efforts will be made to refurbish, extend or upgrade unused public buildings. It is likely that it will include kindergartens and childcare facilities, child-friendly spaces, refurbishment of incubation facilities, workshops and kitchens, market facilities and virtual platforms but these will be selected according to the beneficiary-led process. DAs will implement these subprojects through the 'guided project support' instrument. Given that project funds under Component 2 may be used for small works (such as small construction on public land, retrofitting, refurbishment and IT infrastructure) to improve



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the social and economic infrastructure for the target groups, limited environmental impacts are expected. These impacts may include noise, dust and waste management that are confined to small works such as simple construction, refurbishment, retrofitting.

The Project Operations Manual (POM) will set out the details of all procedures and technical aspects of each project component, including ESF related procedures, and the M&E requirements and reporting procedures. The project will employ various ways to prioritize, incentivize and target youth, women and Syrian refugees and these are described in the Project Appraisal Document and eligibility criteria will be detailed further in the Project Operations Manual.

MoIT has prepared this ESMF to manage the environmental and social impacts and risks of the project. The environmental and social procedures defined in the ESMF will be adopted in to the Sub-Grant Manual (SGM) to guide the process for sub-grant provisions under Component 1 by the DAs. The SGM will be developed by the MoIT and approved by the Bank as part of the POM before project effectiveness. The SGM will be a condition of disbursement. The ESMF includes the environmental and social review procedures and a template of a checklist Environmental and Social Management Plan (ESMP) to be used for low/moderate risk subprojects including small civil works under Component 2.

### ***ESS2: Labor and Working Conditions***

The Labor Act (No. 4857) is consistent with the main requirements of the ESS2. The most significant gap between the Labor Act and ESS2 is the lack of specific requirements on a workplace grievance mechanism, and no requirement related to contractor's grievance redress mechanism. And the Labor Act does not include any provisions regarding the selection, management and monitoring of contractors with regard to ESS2 requirements. These gaps will be covered by the project's Labor Management Procedures (LMP).

A larger issue, however, is the fact that the Labor Act of 2003 does not cover enterprises carrying out agricultural and forestry work and employing less than 50 employees, family-run construction work related to agriculture, works and handicrafts performed in the home, domestic work, sportsmen, people in rehabilitation, enterprises with three or less employees working as tradesmen or producing small handicraft. It cannot be ruled out that some of the activities funded under this project will fall within one of the above categories, and therefore the ESMF will have to specify that under this project, employees in these small enterprises will be provided with rights consistent with ESS2 and national labor legislations, irrespective of any exclusion of labor code application.

A draft LMP has been prepared by MoIT which will be further refined and finalized no later than 30 days after effective date of Project based on the result of the on-going needs assessment of the beneficiaries and of DAs which may affect content of the LMP. The LMP will apply to all project workers. MoIT and DAs will ensure that small scale civil works contractors comply with the policies and procedures included in the LMP and ESMF. The LMP includes a proposed Code of Conduct (Annex D) for project workers as a measure to prevent any potential risks related to SEA/SH. The final LMP will include principles and procedures for workers' grievance mechanism, which will be completed no later than 30 days after project effective date.

Project workers include direct workers and contracted workers. Direct workers are employees of Project Implementation Unit (PIU) which include MoIT staff, employees of DAs and consultants hired by the PIU for the project purposes. MoIT staff are regulated by the Civil Servant's Act No. 657, whereas the consultants are not civil servants. Employees of DAs have a different status than the MoIT staff. They are not civil servants but have a status of public workers with open-ended contracts regulated by the Turkish Labor Code 4857. Contracted workers are (i) workers engaged by CIPs who



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will likely local NGOs; (ii) workers engaged by construction contractors to carry out small-scale civil works; and (iii) trainers and other service provider firms which will be hired under the project to deliver various project activities. Community workers and primary suppliers will not be engaged by the project. Workers engaged by the social enterprises to be supported under the Component 1 are project beneficiaries and measures to protect them are included in the ESMF per ESS1.

In recent years, Turkey has undergone a reform to improve its national OHS system by adapting a set of international and regional standards into its national level requirements for the prevention of occupational risks. In addition to ILO ratification, Turkey has also passed a law specific to OHS (i.e. Law No. 6331 on Occupational Health and Safety) in 2012. The OHS Law governs workplace environments and industries (both public and private) as well as all categories of employees including part-time workers, interns, and apprentices. The legislation is comprehensive and is generally applicable across all sectors and many industries. Labor Inspectorate, which is a part of the Ministry of Labor, Family and Social Services, enforces labor and OHS laws, and conducts regular OHS and labor audits. For any construction works under Component 2, the construction contractors shall be subject to national OHS legislation and ESS2. MoIT and relevant DAs will ensure integration of the provisions regarding OHS in line with WBG EHS Guidelines into the site-specific ESMPs as indicated in the ESMF. Contractors will be contractually obligated to abide by the safety and labor standards, including additional health and safety measures related with the COVID 19 pandemic.

Government of Turkey has prepared and issued various guidelines and measures, which are in line with WHO and other international standards, to be taken against COVID-19 pandemic risks related to civil works, OHS and for workplaces. During the project activities and within the PIU workplace, those measures will be applied to ensure the well-being of the project workers. Guidance is listed in Annex G.

The following are a number of relevant requirements on the Contractor:

- provide health and safety training for Contractor's Personnel (which include project workers and all personnel that the Contractor uses on site, including staff and other employees of the Contractor and Subcontractors and any other personnel assisting the Contractor in carrying out project activities) to put in place workplace processes for Contractor's Personnel to report work situations that are not safe or healthy,
- give Contractor's Personnel the right to report work situations which they believe are not safe or healthy, and to remove themselves from a work situation which they have a reasonable justification to believe presents an imminent and serious danger to their life or health (with no reprisal for reporting or removing themselves),
- require measures to be in place to avoid or minimize the spread of diseases including measures to avoid or minimize the transmission of communicable diseases that may be associated with the influx of temporary or permanent contract-related labor,
- provide an easily accessible grievance mechanism to raise workplace concerns.

The PIU/DAs should request details in writing from the main Contractor via grant recipient local authority of the measures being taken to address the COVID-19 risks. In preparing the measures, workforce characteristics, entry/exit to the work site and checks on commencement of work, general hygiene requirements, cleaning and waste disposal, adjustment of work practices, project medical services, training, communication and contact with community should be particularly assessed.

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



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The subgrant applicants will be encouraged to use the subgrant proceeds for energy/water/raw material efficiency improvements in their existing facilities or establishing new facilities with most efficient equipment, to the extent technically and financially feasible. Under component 1, the impacts and risks associated with pollution prevention are considered to be minor scale waste management, wastewater generation and water and food quality which can be easily mitigated through the national regulatory requirements.

Under Component 2, subgrants for livelihood facilities will also be targeted at improving energy efficiency to the extent technically and financially feasible, as part of the upgrade of infrastructure (e.g. for community centers). The associated impacts with respect to minor refurbishment of the buildings to establish livelihood facilities would include dust, noise and waste management which can be mitigated through checklist ESMPs as described in this ESMF. In addition, community mobilization activities supported by the project will include awareness-rising on the implications of climate change and training of women as focal points in energy efficiency in order to increase resilience of participating communities.

#### ***ESS4: Community Health and Safety***

The project design would limit the types of activities that may be supported with subgrants so as to minimize potential negative impacts on community health and safety.

For physical structures (e.g. child care facilities, production or maker spaces), checks for seismic resilience will be part of standard construction approval and oversight. Furthermore, during small construction works, the sites will be protected against trespassing of public, with appropriate signage and fencing. Furthermore, emergency preparedness and response plans will be established (including measures related with COVID19 pandemic), where required. During refurbishment and retrofitting activities, local community members will be informed about construction schedule and works to be conducted. Where technically and financially feasible, the DAs and municipalities will also apply the concept of universal access to the design, refurbishment and construction of such facilities. Life and Fire safety is another important issue during operational phase of the public access buildings such as child care facilities. Design and operation of the public access buildings should meet the requirements stipulated in WBG General EHS guidelines. With this intention, buildings accessible to the public should be designed, refurbished/constructed and operated in full compliance with local building codes, local fire department regulations, local legal/insurance requirements, and in accordance with an internationally accepted life and fire safety (L&FS) standard. Labor influx risks and impacts are not expected. The project will make efforts to hire local workers for the small-scale civil works under the Component 2. Social enterprises to be supported under the Component 1 may hire employees, but the number of employees will be limited and most if not all of them will be hired locally. LMP includes Code of Conduct applicable to project workers. Among other issues, Code of Conduct will prohibit behaviors which may lead to sexual exploitation and abuse (SEA).

There will be no major works that would require security personnel to be assigned within the scope of the project. However incase need be, any security personnel engaged in the civil works associated with the project will follow strict rules of engagement, code of conduct, and avoid any escalation as described in ESMF and LMP.

#### ***ESS10: Stakeholder Engagement and Information Disclosure***



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Prior to appraisal, MoIT has prepared an advanced draft SEP, which identifies (i) the key stakeholders; (ii) means of sharing and disclosing information to the stakeholders; (iii) frequency of the engagement of project stakeholders and beneficiaries throughout the project; d) feedback mechanisms; e) responsible units/organizations with this engagement; and f) timeline for the engagement. The process of stakeholder engagement has begun during preparation and will continue into project implementation. The draft SEP was disclosed on November 12, 2019 and consultations took place on November 25-26, 2019 by MoIT in Ankara. Latest consultation meeting was held through online meeting at January 25, 2021. The SEP updated with inputs from consultations and redisclosed. The SEP will be updated as the project design evolved and details about the project GRM becomes clear, and will be redisclosed for consultations once again no later than 30 days after project effective date. The SEP will also be revised as needed during project implementation.

The SEP has identified main stakeholder groups as: (1) Project Affected People: Women and youth from host and refugee communities, male household members, community members, community leaders (mukhtars), children of refugee and host community families, social enterprises, people employed by social enterprises, existing community businesses, buyers of goods and users of services provided by the social enterprises. (2) Other interested parties: a) MoIT, Ministry of Trade, Ministry of Family, Labor and Social Services, Ministry of Education, Directorate General for Migration Management, DAs, municipal authorities of 11 target cities, Small and Medium Enterprise Development Agency (KOSGEB), FRIT Coordination office at Presidency of the Republic of Turkey, Strategy and Budget Office of Presidency as Government Authorities. b) Private sector - existing social enterprises, other enterprises, contractors, chambers of commerce and industry. c) FRIT Project Steering Committee, CIPs, local and international NGOs as project implementing partners. d) International development partners such as but not limited to EU Delegation to Turkey, WB, UNHCR, UNDP, ILO, IOM, GIZ, Turkish Red Crescent, ICMPD and other bilateral organizations operating in the refugee protection and livelihood improvement field and e) Media.

A functional GRM will be established based on the principles laid out in the draft SEP and described in the final SEP and the POM no later than 30 days after effective date to ensure grant recipients can share feedback and/or express grievances in both Turkish and Arabic languages. Currently, both the Ministry and the DAs have a preliminary feedback mechanism in place where grant beneficiaries in their current programs can submit any feedback, requests, questions or complaints via phone, website or formal letter. In addition, the Presidency's CIMER (Public Communication Center) are accessible and functional for any Turkish citizen. YIMER, which is the Public Communication Center for the foreigners in the country managed by Ministry of Interior, is open to all foreigners, including the Syrians. However, the current GRM applied by the DAs will need to be upgraded and tailored for the project to ensure accessibility of the Syrian refugees including through allowing inquiries and grievances to be submitted in Arabic. The GRM and stakeholder engagement will need to be available in both Turkish and Arabic languages.

Under current practice, DAs have targeted communications strategy throughout the lifecycle of the grant programs they implement. By law, DAs have different local stakeholders on their board (such as representatives of the union of commerce, mayor, governor, universities, local NGOs and local business organizations). The DAs will also engage with CSOs, which will act as CIPs, specifically on refugee and migrant issues, to promote outreach of the grant programs and will continue close cooperation and coordination of various agencies and institutions for implementation and follow up of project activities. In disseminating project related information to the direct beneficiaries from refugee and host communities, both the MoIT and DAs will employ competent personnel and use various engagement tools that are specified in the project's SEP. Both Syrian refugee and host



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communities will be consulted on detailed information about the Project and concrete E&S measures when they become available, before effectiveness. Stakeholder engagement, and specifically beneficiary engagement is key to the success of the project and building awareness among the target groups. In particular, stakeholder engagement activities will ensure that men and women of all ages are empowered to voice their views and concerns. Specifically, refugees and host community members will be involved in participatory needs assessments, in the participatory decision-making over the form of capacity building most suited to needs (e.g. training, coaching, mentoring), identifying livelihoods-related facilities and support for community facilities through participatory planning with municipalities and to provide feedback on the quality of the training and mentoring services. The SEP will be closely coordinated with the citizen engagement objectives of the project throughout implementation in order to ensure inclusion of the vulnerable groups in project implementation.

As a part of the Component 3, the project will develop institutional capacity for stakeholder engagement during implementation, in order to minimize the risk of social tension and competing interests of communities who would like to benefit from the grants. In addition, depending on the nature of any potential social tensions on the ground, development agencies will undertake targeted and pro-active public communications campaign specialized for both refugee and host communities to emphasize the mutual socio-economic benefits of the project. Since the project is funded under the EU's FRIT funds, EU visibility and communications plan is being prepared and will interact in line with the project's SEP.

#### 4. POTENTIAL ENVIRONMENTAL AND SOCIAL IMPACTS

According to the WB's E&S Policy, the Bank classifies all projects 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.

The present project is rated as being of **Substantial Risk**.

**Environmental Impacts (including safeguards).** . The environmental risks of the project activities are **Moderate**. The activities to be financed through grants under Component 1 are mainly to promote entrepreneurs for starting up new, or expanding, socially and environmentally oriented businesses. Under Component 1 of the project, the potential sectors of microbusinesses to be supported are agricultural production, food production, small manufacturing, textile and garments, arts and crafts, social services and clean products which may contribute to minor scale environmental risks such as waste management, energy consumption, wastewater generation, OHS risks such as slips and falls, cuts and burns, water and food quality which can be easily mitigated through national regulatory requirements and use of Good International Industry Practices Given that project funds under Component 2 may be used for small civil works (such as small construction, retrofitting, refurbishment and IT infrastructure) to improve or renovate the social and economic infrastructure on public land for refugee and host communities (i.e. effort will be made to refurbish, extend or upgrade unused public buildings), the environmental impacts are expected to be small/moderate, limited to the activity sites and temporary. It is likely that it will include kindergartens and childcare facilities, child-friendly spaces, refurbishment of incubation facilities, workshops and kitchens, market facilities and virtual platforms selected according to the beneficiary-led process and implemented through the 'guided project support' instrument. The environmental impacts associated with component 2 are expected to be limited and manageable, including noise, dust and waste management that are



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confined to small works such as simple construction, refurbishment, retrofitting. These potential adverse impacts will be addressed through the site-specific ESMPs, as outlined below in this ESMF.

### **Social Impacts (including safeguards).**

The project is expected to have positive social impacts specifically by contributing to livelihoods and empowerment of women and youth in refugee and host communities and improving or at least preventing disruptions in social cohesion.

The social enterprise, livelihood facilities and institutional support components together meet economic, social and institutional goals, namely: (i) to expand economic opportunities for mostly women refugee and host communities through support for social enterprises and vital livelihoods facilities; (ii) to improve social cohesion between refugees and host communities through social enterprise development and participatory engagement in livelihoods facilities by assisting women and youth to engage in microbusinesses in sectors such as agricultural production, food production, small manufacturing, textile and garments, arts and crafts, social services and clean products). Further, Component 3 will enhance institutional capacities of the Ministry of Industry and Technology (MoIT), Development Agencies (DAs), municipalities, other relevant government agencies, and local development partners to support women's social enterprises.

The social risks are expected to be **Substantial**. While intrinsic social risks of the project are moderate, contextual factors contribute to the substantial risk. The project is expected to have no irreversible or unmanageable social impacts, but substantial positive social impacts on the lives and social integration of the target groups.

**Risks of Social Tension:** Social tension and increasing lack of social cohesion<sup>7</sup> within communities hosting Syrians constitute a major risk to the project. Factors contributing to the emergence of community-level fragility include the protracted nature of the displacement crisis, the decreasing likelihood of near-term return, declining economic performance within Turkey, enduring cultural and social distance between each community, and the broader regional political volatility. At least 30 percent of the refugee population currently living in Turkey are vulnerable according to recent reports. Perceptions that Syrians outcompete hosts for low-wage jobs and are pushing rents up, perceived violations of social norms by displaced communities, and perceived preferential access to public services and assistance for Syrians have also contributed to deteriorating social cohesion in host areas. For their part, Syrians express concerns about poor working conditions, tensions in the workplace, low wages and exploitation by employers. The language barrier is among the most important factors hindering socio-economic harmonization, especially for women and children.

In order to manage social tensions risks in some cities due to the host community sensitivities around the competition for employment opportunities and access to services, MoIT has prepared a Stakeholder Engagement Plan (SEP). SEP which requires rigorous pro-active communication and stakeholder engagement while designing and implementing the entrepreneurship sub-grant programs. The DAs and MoIT will develop a targeted communication strategy including the eligibility criteria and sub-grant selection process. To mitigate risks and enable project beneficiaries to express project-related grievances and concerns, MoIT and DAs will establish a project level GRM no later than

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<sup>7</sup> Social cohesion in the context of this project refers to six core components of well-being in a community: sense of belonging; ability to participate in decision-making (efficacy); equality of opportunity; opportunities for upward social and economic mobility; trust among a community's constituent groups; and social and political recognition



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30 days after the effective date of the Project..

**Informality of work:** The low number of work permits issued to Syrians can be seen as an indication of the information, language, and skills barriers faced by the refugees. In addition, the lack of work permits further exposes the workers to hazardous work conditions and under-payment, as they would not be protected by the Labor Act. In addition, Labor Act does not provide protection to those who work in enterprises employing less than 50 workers in agricultural and forestry sector and employing less than 50, family-run construction work related to agriculture, works and handicrafts performed at home, domestic work, enterprises with three or less employees working as tradesmen or producing small handicraft.

Informality of work, lack of coverage by the Labor Act, poverty, and lack of language abilities greatly enhance the risk to the Syrian refugees labor force in general, especially women and young people.

**Women and children at risk:** A World Bank assessment (2017) sheds light on the change in intra-household dynamics and patriarchal codes within displaced Syrian's communities in Turkey. The pressure to work often affects women and children, specifically forcing families to exploit child labor. Following the exile in Turkey combined with the absence of some male household heads and rising unemployment among displaced men, necessitates women to secure a livelihood. The result is increased intra-household tensions, such as domestic/intimate partner violence. Children are also often employed informally, at the expense of their education and future economic prospects.

**Labor Risks:** Since the project supports women's entrepreneurship and employment opportunities, potential risks and impacts related to labor and working conditions are expected to be managed with principles and procedures included in the project design and the Environmental and Social Screening Checklists which the Development Agencies would prepare before sub-grants are provided to beneficiaries (CIPs) as per the ESMF. These principles and procedures will be consistent with the national labor code and the Bank's Environmental and Social Standard on Labor and Working conditions (ESS 2) to avoid any potential harm and risks on child labor, forced labor and gender-based risks. The minimum employment age at the social enterprises will be the age of 18, and social enterprises will apply a age screening procedure. All social enterprises will be formally established entities employing workers formally.

The social enterprises and the people they shall employ are the project beneficiaries. A number of measures to protect them are included in the project design, ESMF and grant manuals. These social enterprises shall follow applicable national labor and employment legislation. Any potential risks related to child and forced labor will be mitigated with procedures included in the ESMF. The sub-grants manual will explicitly exclude any activities which involve child labor or forced labor. The project design already included support to child care facilities, as a measure to avoid the employment of children in social enterprises. The CIPs will have the supervisory role and be responsible to the DAs to ensure that skills and business training provided to project beneficiaries leads to positive employment outcomes.

Capacity building will be provided for the MoIT and Development Agencies in the World Bank ESF.

## 5. ENVIRONMENTAL AND SOCIAL MANAGEMENT PROCEDURES

Based on the planned scope of the project, the environmental and social risks and impacts are expected to be low/moderate in magnitude and temporary. Since the sub-projects under the project cannot be defined until the project implementation, an environmental and social standard review



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framework has been prepared. The operations of sub-grant applicants will be executed in compliance with the Turkish environmental, labor, and occupational health and safety legislation as well as the WB's ESF and other WB safeguards policies.

Sub-grants/subprojects for social enterprise incubation and acceleration, and sub-grants/subprojects for community livelihoods-related facilities will be screened and classified according to the environmental and social risk categorization principles provided in the World Bank's ESF, and only sub-grants/subprojects of "**Moderate Risk**" or "**Low Risk**" will be eligible for financing.

Environmental and social (E&S) assessment process is applied to identify the potential positive or negative impacts of proposed subprojects, prevent or minimize the negative impacts that may harm the environment and to evaluate the measures to be taken to control and supervise subproject implementation. While no further environmental and social assessment is required if the sub-project is determined to be Low risk, an environmental and social management plan (ESMP) will be prepared for the Moderate risk sub-projects.

A sub-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. The sub-projects to be financed under Component 1 and Component 2 of the project must be subject to an environmental and social review by DAs, according the procedures outlined below. MoIT and DAs will be responsible for successful implementation of the project.

### 5.1. Screening and E&S Assessment for Component 1 (Subgrants for Social Enterprise Incubation and Acceleration)

The sub-grant applicant will apply to DAs for the grant for a subproject after obtaining all required environmental permits and approvals from the MoEU or related Provincial Directorates of MoEU required under Turkish legislation. These required EIA and related environmental documents will only be requested from social enterprises which have reached the final application stage.

DAs will undertake initial screening of sub-projects and categorize them based on the criteria outlined above. To assist the DAs fulfill review obligations in line with this ESMF, DAs will provide the ESMPs of



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the first three “*Moderate Risk*” subprojects to the World Bank’s review and approval. After this “pilot” period, if the WB and DAs agree, the WB will convert the E&S assessment process to “post” review. DAs will screen the project against the Ineligibility List (Annex A), and pursuant to the WB ESF Policy, Section A: Environmental and social risk classification. An indicative list of potential sectors to be financed within the scope of the project and respective anticipated environmental and social impacts and corresponding risk rating can be found in Annex I. After eligibility check, the environmental and social screening will be applied to the sub-projects to identify the environmental and social risk category of the sub-projects. For the existing facilities (acceleration sub-grants), the CIPs and DAs will be filling out the screening form given in Annex H while incubation sub-projects will be screened through the environmental and social screening checklist provided in Annex J. Depending on the outcomes of the screening process, the sub-grants will be categorized as “*Moderate*” or “*Low*” which are eligible for financing under this project.

It is anticipated that one of the following three options would apply to sub-projects classified as “*Moderate Risk*” or “*Low Risk*”;

- a. If a subproject classified as “*Moderate Risk*” is covered by Annex-II according to the Turkish EIA Regulation, then a Project Information File (PIF) must be sent to the related Provincial Directorate of Ministry of Environment and Urbanization (MoEU) according to the Turkish EIA regulation. Such projects will require ESMP (an indicative ESMP outline is given in Annex E and a checklist ESMP for minor construction works is given in Annex F) as an ES assessment requirement of the World Bank. As mentioned above, subprojects involving large scale construction activities will not be eligible under this project, but only minor construction/modification works to be required as a result of machinery/equipment procurement may be included.
- b. If a subproject classified as “*Moderate Risk*” is subject to neither Annex-I nor Annex-II according to Turkish EIA Regulation (i.e. if it is a “No-Annex” project) then there will not be any environmental documentation most probably. Such projects will require ESMP (an indicative ESMP outline is given in Annex E and a checklist ESMP for minor construction works is given in Annex F) as an ES assessment requirement of the World Bank. As mentioned above, subprojects involving large scale construction activities will not be eligible under this project, but only minor construction/modification works to be required as a result of machinery/equipment procurement may be included.

It must be noted that the installations of existing building and the extension of existing buildings are often regarded as “No-Annex”/“No-EIA” project according to the Turkish EIA Regulation; but they will be classified as “*Moderate Risk*” sub-project according to the World Bank criteria. In such cases, as mentioned above, environmental documentation will not be required under the Turkish legislation, but an ESMP will be prepared to meet the ES assessment requirements of the World Bank.

- c. If a sub-project classified as “*Low Risk*” is subject to neither Annex-I nor Annex-II according to Turkish EIA Regulation (i.e. if it is a “No-Annex” project) then there will not be any environmental documentation most probably. As mentioned above, these projects, with few or no adverse risks and impacts and issues, do not require further ES assessment following the initial screening according to the World Bank’s ES Policy.



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Renovation works that cover only the replacement of machinery/equipment are also regarded as “No-Annex”/“No-EIA” project according to the Turkish EIA Regulation (as long as the resulting wastes, emissions, wastewater discharges, etc. do not substantially change the result of that replacement process) and they will be categorized as “Low Risk” subprojects according to the WB criteria. Such sub-projects will not require any additional environmental and social assessment.

At the time of initial application, the sub-grant applicant will declare the category of the activity to be funded by sub-grant, according to the Turkish EIA Regulation. The sub-grant applicant (and with CIP’s support) will declare that the activity is No-Annex if it is not covered by the annexes of the Turkish EIA Regulations, and will submit supporting documents (e.g. EIA No-Annex letter) at the final application stage together with other application documents, to DAs for their review and approval. In addition, the sub-grant recipient will undertake to comply with all national permits required under the Environment Law.

For the incubation sub-grants, the sub-grant applicant will provide information required in the environmental screening form provided in Annex J together with the support of the CIPs. The CIPs will submit the filled-out forms to the DAs where the information validity and the categorization is approved by the DAs. Based on that, DAs will be able to categorize the incubation sub-grants and propose the respective ESF instrument, if needed. For the acceleration sub-grants, the DAs should verify by using the Environmental and Social Screening Forms (provided in Annex G), that the existing facility/activity is compliant with the Turkish environmental legislation and all necessary permits and approvals have been obtained. In addition, the sub-grant recipient must undertake all labor, and occupational health and safety measures that are pursuant to the national labor, and occupational health and safety legislation, for the activity to be financed from the sub-grant.

The sub-grant recipient will inform DAs of any significant environmental or social incidents (e.g. fatalities, accident involving an injury that occurs at the workplace, environmental spills, major social conflict, any incidents related to work place harassment, etc.) within three business days and DAs will share that information with the World Bank within three business days. The DAs will send an incident investigation report together with the corrective action plan in 30 business days to the World Bank.

Subprojects involving any type of land acquisition are ineligible, so DAs will make sure that all the planned works will be carried out in the existing factory/production buildings and/or on existing lands owned by public institutions or industrial zones and that investment assessments confirm that the related areas are currently not occupied by any other person or is not used for any economic activity.

With regard to cultural assets, local municipalities are responsible for enforcing Turkish laws and regulations including those governing cultural heritage. Relevant provisions will be incorporated into business contracts requiring that construction works be stopped, and relevant authorities are informed immediately if a contractor finds or comes across a chance-find. Since the national legislation on protection of cultural assets is already strict, and any subproject having an impact on cultural heritage will not be eligible for the sub-grants, it is anticipated that no extra requirement will need to be satisfied under the WB ESF.

Once the environmental and social conditions are determined and the subproject file is prepared together with relevant permits and explanations, DAs will evaluate the proposed sub-grant application. DAs will monitor compliance with the environmental and social obligations established by legal authorities and the requirements of WB ESF.



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## 5.2. Screening and E&S Assessment for Component 2 (Sub-grants for Livelihoods Facilities)

Subprojects to be financed under Component 2 (Livelihoods facilities for refugee and host communities) will be mainly for refurbishment, renovation, and extension of facilities on public land, and will likely include kindergartens and childcare facilities, child-friendly spaces, refurbishment of incubation facilities, workshops and kitchens, market facilities and virtual platforms. The refurbishment, renovation, and extension of existing buildings are often regarded as “No-Annex”/“No-EIA” project according to the Turkish EIA Regulation.

If a subproject to be financed under Component 2 is classified as “**Moderate Risk**”, ESMP checklist (provided in Annex F) will be prepared for minor rehabilitation or small-scale construction works as an ES assessment requirement of the World Bank. Since these sub-projects will be implemented through the ‘guided project support’ instrument of the DA, ES assessment requirements will be a part of the feasibility study of the planned sub-project and will be prepared accordingly.

If a subproject to be financed under Component 2 is classified as “**Low Risk**”, it will not require further E&S review following the initial screening according to the World Bank’s ES Policy, as also described above.

The sub-grant recipient will undertake to comply with all permits required under the Environment Law. In addition, the sub-grant recipient must undertake all labor, and occupational health and safety measures that are pursuant to the national labor, and occupational health and safety legislation, for the activity to be financed from the sub-grant. In addition, sub-grant recipients shall ensure the contractors to comply with the labor provisions of the Labor Management Procedures (LMP) of MoIT for this project.

The sub-grant recipient will inform DAs of any significant environmental or social incidents (e.g. fatalities, accident involving an injury that occurs at the workplace, environmental spills, major social conflict, any incidents related to work place harassment, pandemic/outbreak of communicable diseases etc.) within three business days and DAs will share that information with the World Bank within three business days. The DAs will send an incident investigation report together with the corrective action plan in 30 business days to the World Bank.

## 5.3. Child labor risk screening and mitigation measures for Components 1 and 2

The minimum working age of workers employed by the social enterprises will be 18 years. National law and MoIT’s and DAs policies do not permit child labor. Even the national law defines as minimum working age the age of 15 years (for only certain sectors, with working hour limitations), the social enterprises will be required to verify the age of all workers. This will require workers to provide official documentation, which could include a national identification card, passport, birth certificate, certificate based on the results of a medical examination, or any other government issued identification.

If a child under the minimum age is discovered working on the project, measures will be taken to immediately terminate the employment or engagement of the child in a responsible manner, taking into account the best interest of the child. If possible, the child will be enrolled in school.

The contracts with social enterprises will include provisions on the prohibition of child and forced labor. The trainings for social enterprises provided by CIPs will include awareness sessions on the prohibition of child and forced labor, trainings on labor rights.

Prevention measures:



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- Trainings for social enterprises will include awareness sessions about detrimental aspects of child labor and awareness about national legislation pertaining prohibition of child labor. The trainings will include age verification procedure
- Social enterprises will provide awareness sessions about prohibition of child labor to its employees
- CIPs will inform social enterprises and workers they employ about the grievance mechanism which they can use to report child labor, including anonymous reports
- CIPs will carry to periodic supervision visits to social enterprises to monitor that they do not engage child labor

In instances where a child (person below the age of 15) is found working in the social enterprise, the contract with the social enterprise will be terminated and support to the social enterprise will cease. In such instances, the Labor Inspectorate of the Ministry of Labor will be informed about the child exploitation.

## 6. GRIEVANCE MECHANISM

The current GRM that DAs have need to be adjusted for the project and made accessible to the Syrian refugees in the country as well. GRM will be available to grant recipients to share feedback and/or grievances. Currently, both the MoIT and the DAs have some sort of feedback mechanisms in place, which are accessible and functional. Grant applicants and recipients can submit any feedback, questions or complaint via phone or website. In addition, the country's national grievance and communication center called CIMER, which is governed under the Presidency, is also available to project beneficiaries. In addition to Turkish language, the GRM and stakeholder engagement activities would also need to be available in the native language of the refugees (Arabic). A functional project level GRM will be detailed in Project's operational manual no later than 30 days after project effective date.

In addition, DAs will initiate and maintain a grievance redress mechanism (GRM) for the project beneficiaries to submit their requests and concerns/feedback related to the project. This mechanism will be established through existing communication channels of the DAs available in the languages of the refugee and host communities (Arabic and Turkish). Two sample grievance forms; namely Grievance Register Form and Grievance Close Out Form have been provided in Annex H.

The Labor Act does not have any legal provisions regarding workplace grievance mechanisms. And there are no provisions are made regarding the possibility for contracted workers to bring grievances to a project sponsor. The Project Labor Management Procedure (LMP) will define a generic work-place GRM which will be available to direct and contracted workers under the project. Special attention should be paid to ease of access and availability in both Arabic and Turkish.



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## 7. INSTITUTIONAL ARRANGEMENTS

### 7.1. MoIT and DAs' Capacity for ESMF Implementation

Key staff have moved from the Ministry of Development to MoIT, which had previously limited experience with World Bank-financed projects. Neither MoIT nor the DAs have designated capacity for environmental and social risk management. In addition, the MoIT and DAs have not worked directly on refugee-related issues, hence, there is a need for a capacity building program for the MoIT's and DAs staff who will be working in this project.

MoIT will establish a dedicated Project Implementation Unit (PIU) for the purposes of project management and coordination and appoint a dedicated Project Coordinator. The MoIT will ensure overall compliance with the provisions of a Project Operations Manual (POM) which will establish the guidelines for, and overseeing the implementation of, Components 1 and 2, as well as the implementation responsibility for consistency with the applicable environmental and social standards, procurement, financial management, monitoring and evaluation (M&E) and overall coordination.

MoIT will appoint qualified 2 social and environmental staff to ensure compliance with the ESMF and monitoring of the DAs on environmental and social screening as well as development and implementation of ESMPs, where relevant. The PIU staff will continuously monitor the implementation of the ESMF provisions at the DA level, and will be reporting on the performance, annually. The DAs will also hire or appoint one environmental and one social specialist to ensure that the environmental and social screening procedures provided in the ESMF are duly implemented, and the sub-grant activities are effectively monitored and reported in accordance with the ESMPs, where relevant.

The CIPs will also need to have a capacity to collect/provide sufficient information to support the DAs conduct environmental and social screening. Furthermore, if the sub-grant applications are determined to be **"Moderate"** risk, the CIPs will need to collaborate with the DAs and its environmental and social experts to prepare site-specific ESMPs. If needed, short term consultancy services can be procured.

Under component 2, municipalities will prepare the checklist ESMP for minor refurbishment works for "Moderate" risk sub-projects to be conducted in the livelihood facilities. In this respect, the internal environmental and social capacity of the municipalities is considered to be sufficient. However, short term consultancy services can be procured as well.

E&S staff of both MoIT and DAs will receive a training in the ESMF and associated instruments to build their capacity for the proper implementation and reporting of the ESMF. The MoIT and DA E&S staff will also provide training to the potential CIPs as well as the municipalities on the requirements of the ESMF.

Development Agencies have less experience of social development than private sector development, but they have a commitment to local socio-economic development in vulnerable communities (women's entrepreneurship and social cooperatives, support for children and youth, and vocational and technical education programs for NEETs). The MoIT carries out annual assessments of the Development Agencies, and thus the performance of the DAs selected for the project is regularly assessed. Each DA will appoint a Project Manager and ensure the management, technical, fiduciary, communications and safeguard staffing to implement the project in the target provinces.



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Capacity Need Assessment of MoIT and DAs' staff with reference to implementation and monitoring of ESMF and associated safeguards instruments will be conducted under Component 3 of the Projects and will form the basis for a capacity building program for the relevant staff.

## 7.2. Budget

The budget for capacity building of E&S safeguards staff at MoIT and DAs in ESMF, and associated safeguards instruments as well as in monitoring hereof, are covered under Component 3 of the Project.

## 8. CONSULTATIONS AND DISCLOSURE

ESMPs, which are prepared for Moderate Risk subprojects, will be disclosed at the site before construction/renovation works begin. There is no consultation/disclosure requirement for subproject classified as "Low Risk".

The project has a Stakeholder Engagement Plan (SEP) prepared by the MoIT and to be implemented by the DAs. The SEP stipulates that the draft ESMF will be disclosed and a stakeholder consultation meeting will be conducted by MoIT both to provide information about the project and introduce this ESMF. Due to the COVID 19 pandemic outbreak and the social isolation measures directed by the Ministry of Health, physical meetings may not be held. Instead, MoIT has disclosed the ESMF on January 6, 2021 and conducted virtual consultations on January 25, 2021 for these drafts together with the updated SEP. This updated ESMF is made publicly available on the website of the MoIT and DAs in local language.

The ESMF was consulted with stakeholders on 25.01.2021 and was disclosed on 05.02.2021 in Turkey.

This ESMF is a living document and may be updated from time to time, as needed. The summary of consultations and participating stakeholders can be found in Annex 2 and 3 of the updated SEP.



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## Annex A: List of Ineligible Subprojects

1. Commercial activities regarding habitats and products, which are prohibited within the framework of CITES Convention.
2. Release of genetically modified organisms to wild life.
3. Production, distribution and sales of prohibited pesticides (that fall under the World Health Organization's Recommended Classification of Pesticides by Hazard Classes 1a (extremely hazardous) and 1b (highly hazardous), or Annexes A and B of the Stockholm Convention, or restricted by Government of Turkey) and herbicides.
4. Trawl fishing.
5. Radioactive products.
6. Hazardous waste storage, processing and disposal.
7. Production of equipment and materials containing CFC, halone and other substances regulated under Montreal Protocol.
8. Manufacturing of electrical equipment containing more than 0.005% PCB (polychlorinated biphenyls) in weight.
9. Manufacturing of asbestos containing products.
10. Nuclear reactors and parts.
11. Processes or unprocessed tobacco, and tobacco processing machinery.
12. Involves the significant conversion or degradation of critical natural habitats.
13. Will significantly damage non-replicable cultural property.
14. Involuntary land acquisition and any activity on land or affecting land that has disputed ownership, tenure or user rights.
15. Any activity on land that is considered dangerous due to security hazards or the presence of unexploded mines or bombs.
16. Weapons including (but not limited to), mines, guns and ammunition.
17. Any activity that will support drug crop production or processing of such crops.
18. Activities involving child and forced labor
19. Activities that pose adverse impacts on any natural and critical habitats with respect to ESS6 and cultural resources with respect to ESS8



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## Annex B: National Environmental Legislation

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 labor 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)

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 these regulations, communiqués and ordinances is given below:

### Air Quality Control and Management

- Regulation Concerning Follow up of Greenhouse Gas Emissions, Official Gazette date: May 31, 2017, No: 30082.
- 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.



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- Regulation for Starting up and Operating a Work Place, Official Gazette date: August 10, 2005, No: 25902.

#### Health and Safety

- Communiqué on Hazard Classes List related to Occupational Health and Safety, Official Gazette date: March 29, 2013, No: 28602.
- First Aid Regulation, Official Gazette date: July 29, 2015, No: 29429.
- Heavy and Hazardous Works Regulation, Official Gazette date: June 16, 2004, No: 25494.
- Health and Safety Signs Regulation, Official Gazette date: September 11, 2013, No: 28762 (based on EU Council Directive 92/58/EEC dated June 24, 1992).
- Regulation Concerning the Use of Personal Protection Equipment at Workplaces, Official Gazette date: July 2, 2013, No: 28695 (based on EU Council Directive 89/656/EEC dated November 11, 1989).
- 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 Methods and Essentials of Work Health and Safety Training for Workers, Official Gazette date: May 15, 2013, No: 28648.
- Regulation on Occupational Health and Safety, Official Gazette date: December 9, 2003, No: 25311) (based on EU Council Directive 89/391/EEC dated June 6, 1989)
- 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.
- 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

- Regulation on the Assessment and Management of Environmental Noise, Official Gazette date: June 4, 2010, No: 27601.
- Regulation on the Environmental Noise Emission caused by Equipment used Outdoors, Official Gazette date: June 30, 2016, No: 29758.



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### 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 Excavation Materials, Construction and Demolition Wastes, Official Gazette date: March 18, 2004, No: 25406.
- 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).



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- Regulation Concerning the Decrease of Ozone Depleting Substances, Official Gazette date: April 7, 2017, No: 30031.
- Regulation Concerning the Increase of Efficiency in the Usage of Energy and Energy Resources, Official Gazette date: October 27, 2011, No: 28097.
- Regulation on Control of Large-Scale Industrial Accidents, Official Gazette date: August 18, 2010, No: 27676.
- Regulation on the Implementation of the Law Concerning Private Security Services, Official Gazette date: September 26, 2009, No: 27358.



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## Annex C: Land Acquisition Checklist

Sub-beneficiary:	
Sub-project title:	
Location of the Subject Land:	
Province:	
District:	
Quarter:	
Ownership Status:	Publicly Owned <input type="checkbox"/> Privately Owned <input type="checkbox"/> Both <input type="checkbox"/>
Type of the Land:	

<b>Info on Subject Land</b>	
Total Area [m <sup>2</sup> ]:	
Total Area Needed for the sub-project [m <sup>2</sup> ]:	
Number of Parcels:	
Number of Shareholders:	

<b>Land Acquisition Status:</b>	
Land already acquired/recently acquired:	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>If YES;</b>	
Date of Acquisition:	
Method of Acquisition:	Willing Buyer/Seller <input type="checkbox"/> Expropriation <input type="checkbox"/>
Amount Paid / Compensation (TL)	
Pending Court Case	Yes <input type="checkbox"/> No <input type="checkbox"/>
Physical Displacement	Yes <input type="checkbox"/> No <input type="checkbox"/>
Loss of Livelihood	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>If NO; a subproject that requires land take will <u>not be eligible</u> for project financing</b>	

<b>Use of The Land</b>	
What is the intended use of the land?	Industry, agriculture, building, etc.
Any users on land (formal/informal)	
If used, state the purpose (agriculture, housing, business etc.)	
Any structures/assets on land (number/type)	

<b>Attachments</b>	Title Deed
	Permits / Transfer Documents
	Rental Agreements
	Purchase agreements
	Court decisions



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	Photos (aerial and on site) of Land and the Date
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## Annex D: Sample Code of Conduct

### CODE OF CONDUCT FOR CONTRACTOR'S PERSONNEL

We are the Contractor, [enter name of Contractor]. We have signed a contract with [enter name of Employer] for [enter description of the Works]. These Works will be carried out at [enter the Site and other locations where the Works will be carried out]. Our contract requires us to implement measures to address environmental and social risks related to the Works, including the risks of sexual exploitation and abuse and gender-based violence.

This Code of Conduct is part of our measures to deal with environmental and social risks related to the Works. It applies to all our staff, labourers and other employees at the Works Site or other places where the Works are being carried out. It also applies to the personnel of each subcontractor and any other personnel assisting us in the execution of the Works. All such persons are referred to as “**Contractor's Personnel**” and are subject to this Code of Conduct.

This Code of Conduct identifies the behavior that we require from all Contractor's Personnel.

Our workplace is an environment where unsafe, offensive, abusive or violent behavior will not be tolerated and where all persons should feel comfortable raising issues or concerns without fear of retaliation.

### REQUIRED CONDUCT

Contractor's Personnel shall:

1. carry out his/her duties competently and diligently;
2. comply with this Code of Conduct and all applicable laws, regulations and other requirements, including requirements to protect the health, safety and well-being of other Contractor's Personnel and any other person;
3. maintain a safe working environment including by:
  - a. ensuring that workplaces, machinery, equipment and processes under each person's control are safe and without risk to health;
  - b. wearing required personal protective equipment;
  - c. using appropriate measures relating to chemical, physical and biological substances and agents; and
  - d. following applicable emergency operating procedures.
4. report work situations that he/she believes are not safe or healthy and remove himself/herself from a work situation which he/she reasonably believes presents an imminent and serious danger to his/her life or health;
5. treat other people with respect, and not discriminate against specific groups such as women, people with disabilities, migrant workers or children;
6. not engage in any form of sexual harassment including unwelcome sexual advances, requests for sexual favors, and other unwanted verbal or physical conduct of a sexual nature with other Contractor's or Employer's Personnel;
7. not engage in any form of Sexual Exploitation, Rape, Sexual Assault, which means any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the



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sexual exploitation of another. In Bank financed projects/operations, sexual exploitation occurs when access to or benefit from Bank financed Goods, Works, Consulting or Non-consulting services is used to extract sexual gain;

8. complete relevant training courses that will be provided related to the environmental and social aspects of the Contract, including on health and safety matters, and Sexual Exploitation, and Sexual Assault (SEA);
9. report violations of this Code of Conduct; and
10. not retaliate against any person who reports violations of this Code of Conduct, whether to us or the Employer, or who makes use of the [Project Grievance [Redress] Mechanism].

## RAISING CONCERNS

If any person observes behavior that he/she believes may represent a violation of this Code of Conduct, or that otherwise concerns him/her, he/she should raise the issue promptly. This can be done in either of the following ways:

1. Contact [*enter name of the Contractor's Social Expert with relevant experience in handling gender-based violence, or if such person is not required under the Contract, another individual designated by the Contractor to handle these matters*] in writing at this address [ ] or by telephone at [ ] or in person at [ ]; or
2. Call [ ] to reach the Contractor's hotline (*if any*) and leave a message.

The person's identity will be kept confidential, unless reporting of allegations is mandated by the country law. Anonymous complaints or allegations may also be submitted and will be given all due and appropriate consideration. We take seriously all reports of possible misconduct and will investigate and take appropriate action. We will provide warm referrals to service providers that may help support the person who experienced the alleged incident, as appropriate.

There will be no retaliation against any person who raises a concern in good faith about any behavior prohibited by this Code of Conduct. Such retaliation would be a violation of this Code of Conduct.

## CONSEQUENCES OF VIOLATING THE CODE OF CONDUCT

Any violation of this Code of Conduct by Contractor's Personnel may result in serious consequences, up to and including termination and possible referral to legal authorities.

### FOR CONTRACTOR'S PERSONNEL:

I have received a copy of this Code of Conduct written in a language that I comprehend. I understand that if I have any questions about this Code of Conduct, I can contact [*enter name of Contractor's contact person with relevant experience in handling gender-based violence*] requesting an explanation.

Name of Contractor's Personnel: [insert name]

Signature: \_\_\_\_\_



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Date: (day month year): \_\_\_\_\_

Countersignature of authorized representative of the Contractor:

Signature: \_\_\_\_\_

Date: (day month year): \_\_\_\_\_



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## Annex E: 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



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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.



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## Annex F: ESMP Checklist for Small Scale Construction and Rehabilitation Activities

### PART 1: General Project and Site Information

GENERAL	
Country	Turkey
Project title	
Scope of project and activity	
SITE DESCRIPTION	
Name of site	
Describe site location	Attachment 1: Site Map [ ] Y [ ] N
Who owns the land?	
Description of geographic, physical, biological, geological, hydrographic and socio-economic context	
Locations and distance to nearest sensitive receptors such as hospitals, health care units, schools, houses?	
Locations and distance for potential material sourcing especially aggregates, water, stones	
LEGISLATION	
Identify the infrastructures used by the project such as sewer system, electricity, water network etc.	
Identify national & local legislation & permits that apply to project activity (i.e. 1/1000 or 1/5000 scaled master plan arrangements, construction permit, building permit etc.)	
PUBLIC CONSULTATION	
Identify when / where the public consultation process took place	
Brief summary of the issues and concerns raised by the stakeholders	



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## PART 2: Environmental/Social Screening

ENVIRONMENTAL/SOCIAL SCREENING			
	Activity/Issue	Status	Triggered Actions
Will the site activity include/involve any of the following??	A. Building rehabilitation and minor new construction	<input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, then see Section <b>A</b> below
	B. Individual wastewater treatment system	<input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, then see Section <b>B</b> below
	C. Hazardous or toxic materials <sup>8</sup>	<input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, then see Section <b>E</b> below
	D. Traffic and Pedestrian Safety	<input type="checkbox"/> Yes <input type="checkbox"/> No	If yes, then see Section <b>H</b> below

## PART 3: Mitigation Measures

ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
<b>0. General Conditions</b>	Design/Planning considerations	(a) The local construction and environment related authorities and communities have been notified of upcoming activities
	Notification	(b) The public has been notified of the works, including the COVID19 measures taken on sites, through appropriate notification in the media and/or at publicly accessible sites (including the site of the works)
	Worker Safety	(c) All legally required permits have been acquired for construction and/or renovation
	Community Health and Safety	(d) All activities will be implemented in line with the both Law on Occupational Health and Safety (Official Gazette No.28339, dated June 30, 2012) and its relevant regulations and also with the World Bank Group's EHS Guidelines
	Resource Efficiency	(e) The Contractor formally agrees that all work will be carried out in a safe and disciplined manner, and is designed to minimize risks on neighboring residents and environment
		(f) The Contractor will ensure a safe working environment for the workers and supply appropriate personal protective equipment (PPE) in line with international best practice and Turkish Legislation including the health and safety measures related to COVID19 provided by the Ministry of Health and Ministry of Family, Labor and Social Services (always hardhats, as needed masks and safety glasses, harnesses and safety boots, etc.)
		(g) The Contractor will assign personnel with relevant certification and experience in charge of occupational health and safety

<sup>8</sup> Toxic / hazardous material includes but is not limited to asbestos, toxic paints, noxious solvents, removal of lead paint, etc.



ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
		<p>(h) Before the construction works start, a Risk Assessment study will be implemented for all works to be carried out. Relevant procedures and plans (including "Emergency Plans") will be put in place. Both the Risk assessment and Emergency Response Plans will take into consider the COVID 19 risks and other communicable disease risks, as relevant.</p> <p>(i) Appropriate signposting of the sites will be provided and then workers will be informed of key rules and regulations to follow</p> <p>(j) Occupational Health and Safety (OHS) trainings and toolbox talks will be provided to the employees indicating the possible risks regarding the work site and works to be carried out. These will include regular trainings to workers on COVID-19 symptoms, how to be protected and what to do when symptoms appear.</p> <p>(k) Both trainings and incidents (fatalities, lost time incidents, any significant events including spills, fire, outbreak of pandemic or communicable diseases, social unrest etc.) will be recorded</p> <p>(l) The contractor notifies DAs in 3 business days in case of any significant event occurs. DAs will notify the World Bank about any significant incident (accidents, spills, fatalities, etc.) within 3 business days, and will send an incident investigation report together with the corrective action plan in 30 business days to the World Bank</p> <p>(m) Subgrant recipient will apply the concept of universal access<sup>9</sup> to the design and construction of new and renovation of existing structures</p> <p>(n) If construction or renovation works are carried out in operational public buildings and access to these building are directed to other entrances of the buildings thereof, then necessary structures will be formed/constructed/installed considering universal access practices.</p> <p>(o) If construction or renovation works are related with public access buildings (such as child care facilities, etc.), it will be designed to prevent the start of fires through the implementation of national legislation (Regulation on the Protection of Buildings from Fire, Official Gazette No: 26735, dated December 12, 2007) and the internationally accepted life and fire safety standards.</p> <p>(p) Subgrant recipient and the Contractor will implement technically and financially feasible measures for improving efficient consumption of energy water and raw materials, as well as other sources</p> <p>(q) Structures (e.g. child care facilities or maker spaces) will be checked for seismic resilience, as appropriate. Provisions of "Regulations for the Structures to be Built in Disaster Areas" published in the Official Gazette No. 26582 dated 14.07.2007 and "Turkey Building Code" of Disaster and Emergency Management Administration published in the Official Gazette No30364 dated 18.03.2018 that came into force in 01.01.2019 will be strictly followed.</p>
	Air Quality	<p>(a) In case demolition, debris-chutes shall be used above the first floor, and demolition debris shall be kept in controlled area and sprayed with water mist to reduce debris dust</p>

<sup>9</sup> Universal access means unimpeded access for people of all ages and abilities in different situations and under various circumstances.



ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
<b>A. General Rehabilitation and /or Construction Activities</b>		(b) In case pneumatic drilling during excavation dust shall be suppressed by ongoing water spraying and/or installing dust screen enclosures at site (c) The surrounding environment (sidewalks, roads) shall be kept free of debris to minimize dust (d) There will be no open burning of construction / waste material at the site (e) There will be no excessive idling of construction vehicles at sites
	Noise	(a) Noise during renovation and/or construction will be limited to restricted times identified in the relevant legislation (b) During operations the engine covers of generators, air compressors and other powered mechanical equipment shall be closed, and equipment placed as far away from residential areas as possible
	Water Quality	(a) The site will establish appropriate erosion and sediment control measures such as e.g. hay bales and / or silt fences to prevent sediment from moving off site and causing excessive turbidity in nearby water runoffs
	Waste management	(a) Waste collection and disposal pathways and sites will be identified for all major waste types expected from all activities (b) Solid waste will be collected and disposed properly in accordance with environmental legislation (c) The records of waste disposal will be maintained as proof for proper management as designed (d) Whenever feasible the contractor will reuse and recycle appropriate and viable materials (e) Personal hygiene material/equipment wastes (such as single use masks, gloves) will be collected, temporary stored, transported and delivered to waste processing facilities in accordance with the Circular 2020/12 of MoEU on COVID-19 Measures in the Management of Personal Hygiene Equipment Wastes.
	Labor issues and Labor Management (Workers coming from infected areas; Co-workers becoming infected; Workers introducing infection into community/general public)	(a) Consider ways to minimize/control movement in and out of construction/refurbishment site. (b) If workers are accommodated on site require them to minimize contact with people outside the construction/refurbishment site or prohibit them from leaving the site for the duration of their contract. (c) Implement procedures to confirm workers are fit for work before they start work, paying special to workers with underlying health issues or who may be otherwise at risk. (d) Check and record temperatures of workers and other people entering the site or require self-reporting prior to or on entering. (e) Provide daily briefings to workers prior to commencing work, focusing on COVID-19 specific considerations including cough etiquette, hand hygiene and distancing measures. (f) Require workers to self-monitor for possible symptoms (fever, cough) and to report to their supervisor if they have symptoms or are feeling unwell. (g) Prevent a worker from an affected area or who has been in contact with an infected person from entering the site for 14 days. (h) Preventing a sick worker from entering the site, referring them to local health facilities if necessary or requiring them to isolate at home for 14 days.



ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
		<ul style="list-style-type: none"> <li>(i) prepare code of conduct that will be shared with project workers during employment.</li> <li>(f) Contact details of worker’s grievance mechanism will be provided. Workers will be encouraged to use the existing project grievance mechanism to report concerns relating to COVID-19.</li> <li>(g) Avoid gender-based violence by taking appropriate measures such as informing/training workers, ensuring Contractors have a code of conduct in place and aware of the GRM.</li> </ul>
	Occupational Health and Safety (Worker Safety and COVID-19 exposure concerns)	<ul style="list-style-type: none"> <li>(a) All activities will be implemented in line with both the Law on Occupational Health and Safety (Official Gazette No.28339, dated June 30, 2012) and its relevant regulations, and also the World Bank Group’s EHS Guidelines.</li> <li>(b) The Contractor formally agrees that all work will be carried out in a safe and disciplined manner and is designed to minimize risks on neighboring residents and environment.</li> <li>(c) The Contractor will ensure a safe working environment for the workers and supply appropriate personal protective equipment (PPE) in line with international best practice and Turkish Legislation including the health and safety measures related to COVID-19 provided by the Ministry of Health and Ministry of Family, Labor and Social Services (always hardhats, as needed masks and safety glasses, harnesses and safety boots, etc.). In collaboration with local health authorities, that medical staff, first aid facilities, sick bay, ambulance services and any other medical services specified will be available at all times at the site and at any accommodation. If/when the project may need to refer sick workers to local medical services (given the limited scope of the project), preparation should be made at minimum to identify the ways of agreed communication with the local services, ways to transport the ill worker to the medical facility, scope of services to be provided by the local services.</li> <li>(d) The Contractor will assign personnel with relevant certification and experience in charge of occupational health and safety.</li> <li>(e) Before the works start, a Risk Assessment study will be implemented for all works to be carried out. Relevant procedures and plans (including "Emergency Plans") will be put in place. Both the Risk assessment and Emergency Response Plans will take into consider the COVID-19 risks and other communicable disease risks, as relevant.</li> <li>(f) Appropriate signposting of the sites will be provided and then workers will be informed of key rules and regulations to follow.</li> <li>(g) Occupational Health and Safety (OHS) trainings and toolbox talks will be provided to the employees including the code of conduct indicating the possible risks regarding the work site and works to be carried out. These will include regular trainings to workers on COVID-19 symptoms, how to be protected and what to do when symptoms appear.</li> <li>(h) Both trainings and incidents (fatalities, lost time incidents, any significant events including spills, fire, outbreak of pandemic or communicable diseases, social unrest, etc.) will be recorded.</li> <li>(h) Guidance, directives and recommendations of Ministry of Health, Ministry of Family, Labor and Social Services, and World Health Organization shall be followed and all relevant necessary measures shall be taken, both for occupational health and</li> </ul>



ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
		safety of employees and for workplaces, in case of an outbreak of any other pandemic/communicable disease including COVID-19.
<b>B.</b> Wastewater treatment system	Water Quality	(a) The approach to handling sanitary wastes and wastewater from construction/building sites (installation or reconstruction) must be approved by the local authorities (b) Before being discharged into receiving waters, effluents from individual wastewater systems must be treated in order to meet the more stringent quality criteria set out by the national legislation and the World Bank Group’s EHS Guidelines on effluent quality and wastewater treatment (c) Monitoring of new wastewater systems will be carried out (d) Site/construction vehicles and machinery will be washed only in designated areas where runoff will not pollute natural surface water bodies
<b>C.</b> Toxic Materials	Asbestos management	(j) If asbestos is located on the project site, it shall be marked clearly as hazardous material (k) When possible, the asbestos will be appropriately contained and sealed to minimize exposure (l) The asbestos prior to removal (if removal is necessary) will be treated with a wetting agent to minimize asbestos dust (m) Asbestos will be handled and disposed by skilled & experienced professionals (n) If asbestos material is be stored temporarily, the wastes should be securely enclosed inside closed containments and marked appropriately. Security measures will be taken against unauthorized removal from the site (o) The removed asbestos will not be reused and will be disposed in a licensed facility in compliance with the national legislation
	Toxic / hazardous waste management	(a) Temporarily storage on site of all hazardous or toxic substances will be in safe containers labeled with details of composition, properties and handling information (b) The containers of hazardous substances shall be placed in an leak-proof container to prevent spillage and leaching (c) The wastes shall be transported by specially licensed carriers and disposed in a licensed facility (d) Paints with toxic ingredients or solvents or lead-based paints will not be used (e) Waste/used fluorescence lamps generated during renovation and construction will be disposed in a licensed facility
<b>D</b> Traffic and Pedestrian Safety	Direct or indirect hazards to public traffic and pedestrians by construction activities	(a) In compliance with national regulations the contractor will insure that the construction site is properly secured and construction related traffic regulated. This includes but is not limited to: <ul style="list-style-type: none"> <li>▪ Signposting, warning signs, barriers and traffic diversions: site will be clearly visible and the public warned of all potential hazards</li> <li>▪ Traffic management system and staff training, especially for site access and near-site heavy traffic. Provision of safe passages and crossings for pedestrians where construction traffic interferes</li> </ul>



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ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
		<ul style="list-style-type: none"> <li>▪ Adjustment of working hours to local traffic patterns, e.g. avoiding major transport activities during rush hours or times of livestock movement</li> <li>▪ Active traffic management by trained and visible staff at the site, if required for safe and convenient passage for the public</li> <li>▪ Ensuring safe and continuous access to office facilities, shops and residences during renovation activities, if the buildings stay open for the public by considering universal access practices as well</li> </ul>



**PART 4: Monitoring Plan**

Phase		What (Is the parameter to be monitored?)	Where (Is the parameter to be monitored?)	How (Is the parameter to be monitored?)	When (Define the frequency / or continuous?)	Why (Is the parameter being monitored?)	Cost (if not included in project budget)	Who (Is responsible for monitoring?)
During activity preparation <i>(pre-construction)</i>								
During activity implementation <i>(construction)</i>								



## Annex G: Resource List: COVID-19 Guidance

### WHO Guidance

#### Advice for the public

- WHO advice for the public, including on social distancing, respiratory hygiene, self-quarantine, and seeking medical advice, can be consulted on this WHO website:  
<https://www.who.int/emergencies/diseases/novel-coronavirus-2019/advice-for-public>

#### Technical guidance

- [Infection prevention and control during health care when novel coronavirus \(nCoV\) infection is suspected](#), issued on March 19, 2020
- [Recommendations to Member States to Improve Hygiene Practices](#), issued on April 1, 2020
- [Severe Acute Respiratory Infections Treatment Center](#), issued on March 28, 2020
- [Infection prevention and control at health care facilities \(with a focus on settings with limited resources\)](#), issued in 2018
- [Laboratory biosafety guidance related to coronavirus disease 2019 \(COVID-19\)](#), issued on March 18, 2020
- [Laboratory Biosafety Manual, 3rd edition](#), issued in 2014
- [Laboratory testing for COVID-19, including specimen collection and shipment](#), issued on March 19, 2020
- [Prioritized Laboratory Testing Strategy According to 4Cs Transmission Scenarios](#), issued on March 21, 2020
- [Infection Prevention and Control for the safe management of a dead body in the context of COVID-19](#), issued on March 24, 2020
- [Key considerations for repatriation and quarantine of travelers in relation to the outbreak COVID-19](#), issued on February 11, 2020
- [Preparedness, prevention and control of COVID-19 for refugees and migrants in non-camp settings](#), issued on April 17, 2020
- [Coronavirus disease \(COVID-19\) outbreak: rights, roles and responsibilities of health workers, including key considerations for occupational safety and health](#), issued on March 18, 2020
- [Oxygen sources and distribution for COVID-19 treatment centers](#), issued on April 4, 2020
- [Risk Communication and Community Engagement \(RCCE\) Action Plan Guidance COVID-19 Preparedness and Response](#), issued on March 16, 2020
- [Considerations for quarantine of individuals in the context of containment for coronavirus disease \(COVID-19\)](#), issued on March 19, 2020
- [Operational considerations for case management of COVID-19 in health facility and community](#), issued on March 19, 2020
- [Rational use of personal protective equipment for coronavirus disease 2019 \(COVID-19\)](#), issued on February 27, 2020
- [Getting your workplace ready for COVID-19](#), issued on March 19, 2020
- [Water, sanitation, hygiene and waste management for COVID-19](#), issued on March 19, 2020
- [Safe management of wastes from health-care activities](#), issued in 2014
- [Advice on the use of masks in the community, during home care and in healthcare settings in the context of the novel coronavirus \(COVID-19\) outbreak](#), issued on March 19, 2020
- [Disability Considerations during the COVID-19 outbreak](#), issued on March 26, 2020



## WORLD BANK GROUP GUIDANCE

- [Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings](#), issued on March 20, 2020
- [Technical Note: Use of Military Forces to Assist in COVID-19 Operations](#), issued on March 25, 2020
- [ESF/Safeguards Interim Note: COVID-19 Considerations in Construction/Civil Works Projects](#), issued on April 7, 2020
- [Technical Note on SEA/H for HNP COVID Response Operations, issued in March 2020](#)
- [Interim Advice for IFC Clients on Preventing and Managing Health Risks of COVID-19 in the Workplace](#), issued on April 6, 2020
- [Interim Advice for IFC Clients on Supporting Workers in the Context of COVID-19](#), issued on April 6, 2020
- [IFC Tip Sheet for Company Leadership on Crisis Response: Facing the COVID-19 Pandemic](#), issued on April 6, 2020
- [WBG EHS Guidelines for Healthcare Facilities](#), issued on April 30, 2007

## ILO GUIDANCE

- [ILO Standards and COVID-19 FAQ](#), issued on March 23, 2020 (provides a compilation of answers to most frequently asked questions related to international labor standards and COVID-19)

## MFI GUIDANCE

- [ADB Managing Infectious Medical Waste during the COVID-19 Pandemic](#)
- [IDB Invest Guidance for Infrastructure Projects on COVID-19: A Rapid Risk Profile and Decision Framework](#)
- [KfW DEG COVID-19 Guidance for employers, issued on March 31, 2020](#)
- [CDC Group COVID-19 Guidance for Employers, issued on March 23, 2020](#)

## Annex H: Environmental and Social Screening Forms for Existing Facilities

Environmental and Social Assessment Screening Form and Environmental and Social Form (to be used for existing facilities) are provided below.

ENVIRONMENTAL AND SOCIAL ASSESSMENT SCREENING FORM	
(to be filled out by DAs)	
Subproject Owner/Developer:	
Name of Subproject:	
Brief Description	Brief description of the subproject (nature of the subproject, cost of subproject, physical sizes [area of facility, yearly production, etc.], whether there is any property transfer or ongoing activities, plans for extension [nature of new investment, change of type or production capacity] or new construction: estimated potential impact on production)
Screening Category according to the Ministry of Environment and Urbanization – Turkish EIA Legislation	ANNEX-II [ ]
	NO-ANNEX [ ]
Environmental Permit according to the Turkish Legislation	Environmental Permit necessary [ ]
	NO NEED FOR OFFICIAL APPROVAL [ ]



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Screening Category according to the WB ES Policy	INELIGIBLE IN FOLLOWING CASES	"MODERATE RISK"	"LOW RISK"
	"High Risk" / "Substantial Risk" [ ]	[ ]	[ ]
	Under Annex A of ESMF [ ]		
	Subproject has an impact on biodiversity, and takes place in any natural and critical habitats [ ]		
	Subproject involves land acquisition, restrictions on land use and involuntary settlement [ ]		
	Subproject has an impact on cultural heritage [ ]		
	Subproject triggers the WB policy on International Waterways [ ]		
	Subproject involves real estate purchase and major construction works [ ]		
	Subproject involves employments of persons below the age of 18 [ ]		
	Subproject does not have age-screening procedure [ ]		
	Subproject engages workers without written employment contracts [ ]		
	Subproject does not meet OHS requirements		
Next Steps for ES Assessment (if the subproject is eligible)	ESMP available [ ]	No ESMP [ ]	EA Document Not Necessary (only for "Low Risk" subprojects) [ ]
	ESMP sufficient [ ]	ESMP Necessary [ ]	
	ESMP not sufficient, needs to be revised [ ]	Environmental Checklist Necessary [ ]	
ESMP / ESMP Checklist Disclosure Date			NOT Necessary (only for "Low Risk" subprojects) [ ]
Additional comments to improve ESMP / ESMP Checklist			
Any new employment foreseen? If YES, how many (with gender breakdown)?			
Are there any other environmental or social issues to be noted? If YES, please explain			
DATE:			
DA PROJECT OFFICER		SUBGRANT RECIPIENT	
SIGNATURES:		SIGNATURES:	



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ENVIRONMENTAL AND SOCIAL FORM FOR EXISTING FACILITIES					
(to be filled out by sub-grant applicant/CIPs)					
Subgrant applicant:					
Name of subproject:					
Location	Organized Industrial Zone	[ ]			
	Industrial Parcel	[ ]			
	Other (please explain):	[ ]			
Is there land acquisition?	NO [ ]	YES [ ]	If YES, please explain:		
Does the project involve machinery/equipment investment?	NO [ ]	YES [ ]	If YES, please describe in terms of potential environmental and social impacts		
Is there any construction/renovation activities in the scope of the project?	NO [ ]	YES [ ]	If YES, please describe in terms of potential environmental and social impacts		
Will the subgrant support a new business area or production type (as different from ongoing activities)?	NO [ ]	YES [ ]	If YES, please describe briefly		
Valid Environmental Permits	EIA Positive or EIA Not Necessary	YES [ ]	NO [ ]	N / A [ ]	
	Environmental Permit	YES [ ]	NO [ ]	N / A [ ]	APPLICATION FILED [ ]
	Permit Covers Air Emission	YES [ ]		N / A [ ]	
	Permit Covers Environmental Noise	YES [ ]		N / A [ ]	
	Permit Covers Wastewater Discharge	YES [ ]		N / A [ ]	
	Permit Cover Waste Storage	YES [ ]		N / A [ ]	
	Permit Covers Deep Sea Discharge	YES [ ]		N / A [ ]	
	Wastewater Connection	YES [ ]	NO [ ]	N / A [ ]	EXPIRED
	Hazardous Waste Storage (Temporary)	YES [ ]	NO [ ]	N / A [ ]	EXPIRED
	Hazardous Waste Transfer	YES [ ]	NO [ ]	N / A [ ]	EXPIRED
Is there any pending environmental fine or an ongoing lawsuit / investigation?	Other (please explain): YES [ ]		NO [ ]		If YES, please explain:
Are there any audit reports by the Labor Inspectorate or fines?	Other (please explain): YES [ ]		NO [ ]		If YES, please explain:
Number of existing employees (with gender breakdown)					



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Are all workers formally employed with written employment contracts?	
Is there age verification procedure for employment for workers? Describe.	
Does the subproject engage persons below the age of 18?	
Does the facility implement its OHS obligations with respect to national regulations?	
Did subproject report any workplace fatalities, accidents or injuries? If YES, describe and how many.	
Any new employment foreseen? If YES, how many (with gender breakdown)?	
DATE: SUBGRANT RECIPIENT	
SIGNATURES :	

SEC



## Annex I: Potential list of activities to be financed under component 1 and indicative risk categories

Code	Parent	Description	Eligibility	Primary Impact	Assessment Level
<b>Agricultural, Forestry and Aquaculture</b>					
1	A	Crop and animal production, hunting and related service activities	Eligible	<ul style="list-style-type: none"> <li>*soil erosion/land degradation</li> <li>*livelihood related impacts</li> <li>*biodiversity related impacts</li> <li>*agricultural runoff</li> <li>*agrochemical utilization</li> </ul>	<p>Moderate</p> <p>Small scale agricultural subprojects, if they were not established through conversion of natural habitat, do not use pesticide, and have not some other adverse impacts (excessive use of ground or surface water etc.) on the environment.</p> <ol style="list-style-type: none"> <li>1. Agriculture, horticulture, vineyards and orchards (small scale 5 ha)</li> <li>2. Livestock (small-scale - less than 10 head of cattle, small cattle or 500 birds)</li> <li>3. Hunting is not allowed</li> </ol>
2	A	Forestry and logging	Eligible	<ul style="list-style-type: none"> <li>*soil erosion/land degradation</li> <li>*livelihood related impacts</li> <li>*biodiversity related impacts</li> </ul>	Moderate
3	A	Fishing and aquaculture	Eligible	<ul style="list-style-type: none"> <li>*livelihood related impacts</li> <li>*degradation of water ecosystems</li> <li>*water pollution</li> </ul>	Moderate
<b>Mining</b>					
5	B	Mining of coal and lignite	Not Eligible		
6	B	Extraction of crude petroleum and natural gas	Not Eligible		
7	B	Mining of metal ores	Not Eligible		



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Code	Parent	Description	Eligibility	Primary Impact	Assessment Level
8	B	Other mining and quarrying	Not Eligible		
9	B	Mining support service activities	Not Eligible		
<b>Manufacturing</b>					
10	C	Manufacture of food products	Eligible	*waste disposal*energy consumption *occupational health and safety issues	Moderate, if a new processing facility is established Low, small workshops
11	C	Manufacture of beverages	Eligible	*waste disposal *occupational health and safety issues *energy consumption *chemical usage	Moderate, if a new facility is established Low, small workshops
12	C	Manufacture of tobacco products	Not Eligible		
13	C	Manufacture of textiles	Eligible	*waste disposal*air emissions and noise *occupational health and safety issues	Low, change of machinery without any refurbishments, sewing of textile products etc. Moderate, a new line/product is established with refurbishment Substantial if high impact processes such as finishing, dyeing are included/newly established.
14	C	Manufacture of wearing apparel	Eligible	*waste disposal *hazardous materials *noise *occupational health and safety issues	Moderate, if a new facility is established Low, existing facilities, atelier workshops, small scale tailors



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Code	Parent	Description	Eligibility	Primary Impact	Assessment Level
15	C	Manufacture of leather and related products	Eligible	*waste disposal *noise *safety issues * wastewater generation and disposal * chemicals usage	Low – Sewing leather products Moderate – if a new line/product or large scale capacity increase Substantial if large scale integrated leather production facility
16	C	Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plating materials	Eligible	*waste disposal *noise *dust *safety issues * wastewater disposal * chemicals usage	Moderate – new facility established Low – atelier for wooden products
17	C	Manufacture of paper and paper products	Eligible	*waste disposal *noise *dust *safety issues * wastewater disposal * chemicals usage	Substantial – an integrated paper Moderate – new facility established Low – atelier for wooden products
18	C	Printing and reproduction of recorded media	Eligible	*waste disposal *noise *safety issues	Low/Moderate
19	C	Manufacture of coke and refined petroleum products	Not Eligible		
20	C	Manufacture of chemicals and chemical products	Not Eligible		



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Code	Parent	Description	Eligibility	Primary Impact	Assessment Level
21	C	Manufacture of basic pharmaceutical products and pharmaceutical preparations	Not Eligible		
22	C	Manufacture of rubber and plastic products	Eligible	<ul style="list-style-type: none"> <li>*waste disposal</li> <li>*noise</li> <li>*air pollutants</li> <li>*safety issues</li> <li>* wastewater disposal</li> <li>* chemicals usage</li> </ul>	<p>Substantial/Moderate/Low</p> <p>Substantial if new facilities will be established Moderate, if a new line is established/final product is modified Low, if raw materials purchase</p>
23	C	Manufacture of other non-metallic mineral products	Eligible	<ul style="list-style-type: none"> <li>*waste disposal</li> <li>*noise</li> <li>*air pollutant</li> <li>*safety issues</li> <li>* wastewater disposal</li> <li>* chemicals usage</li> </ul>	Substantial/Moderate
24	C	Manufacture of basic metals	Eligible	<ul style="list-style-type: none"> <li>*waste disposal</li> <li>*noise</li> <li>*air pollutants</li> <li>*safety issues</li> <li>* wastewater disposal</li> <li>* chemicals usage</li> </ul>	Substantial/Moderate
25	C	Manufacture of fabricated metal products, except machinery and equipment	Eligible	<ul style="list-style-type: none"> <li>*waste disposal</li> <li>*noise</li> <li>*air pollutants</li> <li>*safety issues</li> <li>* wastewater disposal</li> <li>* chemicals usage</li> </ul>	Substantial/Moderate



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Code	Parent	Description	Eligibility	Primary Impact	Assessment Level
26	C	Manufacture of computer, electronic and optical products	Eligible	*waste disposal *noise *air pollutants *safety issues	Moderate
27	C	Manufacture of electrical equipment	Eligible	*waste disposal *noise *air pollutants *safety issues * wastewater disposal * chemicals usage	Moderate
28	C	Manufacture of machinery and equipment n.e.c.	Eligible	*waste disposal *noise *air pollutants *safety issues * wastewater disposal * chemicals usage	Moderate
29	C	Manufacture of motor vehicles, trailers and semi-trailers	Eligible	*waste disposal *noise *air pollutants *safety issues * wastewater disposal * chemicals usage	Moderate



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Code	Parent	Description	Eligibility	Primary Impact	Assessment Level
30	C	Manufacture of other transport equipment	Eligible	*waste disposal *noise *air pollutants *safety issues * wastewater disposal * chemicals usage	Moderate
31	C	Manufacture of furniture	Eligible	*waste disposal *noise *dust *safety issues * chemicals usage	Moderate
32	C	Other manufacturing	Eligible	*waste disposal *noise *air pollutants *safety issues * wastewater disposal * chemicals usage	Moderate
33	C	Repair and installation of machinery and equipment	Eligible	*waste disposal *noise *air pollutants *safety issues * wastewater disposal * chemicals usage	Moderate
<b>Electricity, gas, steam and air conditioning supply</b>					
35	D	Electricity, gas, steam and air conditioning supply	Not Eligible		
<b>Waste and Wastewater</b>					



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Code	Parent	Description	Eligibility	Primary Impact	Assessment Level
36	E	Water collection, treatment and supply	Not Eligible		
37	E	Sewerage	Not Eligible		
38	E	Waste collection, treatment and disposal activities; materials recovery	Not Eligible		
39	E	Remediation activities and other waste management services	Not Eligible		
<b>Construction</b>					
41	F	Construction of buildings	Not Eligible		
42	F	Civil engineering	Not Eligible		
43	F	Specialised construction activities	Not Eligible		
<b>Wholesale and Trade</b>					
45	G	Wholesale and retail trade and repair of motor vehicles and motorcycles	Not Eligible		
46	G	Wholesale trade, except of motor vehicles and motorcycles	Eligible	no adverse impacts	Low
47	G	Retail trade, except of motor vehicles and motorcycles	Eligible	no adverse impacts	Low
<b>Transportation</b>					
49	H	Land transport and transport via pipelines	Not Eligible		
50	H	Water transport	Not Eligible		
51	H	Air transport	Not Eligible		
52	H	Warehousing and support activities for transportation	Not Eligible		
53	H	Postal and courier activities	Eligible	no adverse impacts	Low



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Code	Parent	Description	Eligibility	Primary Impact	Assessment Level
<b>Accommodation and Food Service</b>					
55	I	Accommodation	Eligible	no adverse impacts	Low
56	I	Food and beverage service activities	Eligible	no adverse impacts	Low
<b>Mass media and broadcasting</b>					
58	J	Publishing activities	Eligible	no adverse impacts	Low
59	J	Motion picture, video and television programme production, sound recording and music publishing activities	Eligible	no adverse impacts	Low
60	J	Programming and broadcasting activities	Eligible	no adverse impacts	Low
61	J	Telecommunications	Eligible	no adverse impacts	Low
62	J	Computer programming, consultancy and related activities	Eligible	no adverse impacts	Low
63	J	Information service activities	Eligible	no adverse impacts	Low
<b>Financial Services and Insurance</b>					
64	K	Financial service activities, except insurance and pension funding	Not Eligible		
65	K	Insurance, reinsurance and pension funding, except compulsory social security	Not Eligible		
66	K	Activities auxiliary to financial services and insurance activities	Not Eligible		
<b>Real Estate</b>					
68	L	Real estate activities	Not Eligible		
<b>Professional, scientific and technical activities</b>					



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Code	Parent	Description	Eligibility	Primary Impact	Assessment Level
69	M	Legal and accounting activities	Not Eligible		
70	M	Activities of head offices; management consultancy activities	Eligible	no adverse impacts	Low
71	M	Architectural and engineering activities; technical testing and analysis	Eligible	*waste management *safety issues	Low/Moderate
72	M	Scientific research and development	Eligible	*waste management *chemical usage *safety issues	Low/Moderate
73	M	Advertising and market research	Eligible	no adverse impacts	Low
74	M	Other professional, scientific and technical activities	Eligible	*waste management *chemical usage *safety issues	Low/Moderate
75	M	Veterinary activities	Not Eligible		
<b>Business Support</b>					
77	N	Rental and leasing activities	Not Eligible		
78	N	Employment activities	Eligible	no adverse impacts	Low
79	N	Travel agency, tour operator and other reservation service and related activities	Eligible	no adverse impacts	Low



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Code	Parent	Description	Eligibility	Primary Impact	Assessment Level
80	N	Security and investigation activities	Not Eligible		
81	N	Services to buildings and landscape activities	Eligible	*waste management *safety issues *chemical usage	Low
82	N	Office administrative, office support and other business support activities	Eligible	no adverse impacts	Low
<b>Public administration</b>					
84	O	Public administration and defence; compulsory social security	Not Eligible		
<b>Education</b>					
85	P	Education	Eligible	no adverse impacts	Low
<b>Health</b>					
86	Q	Human health activities	Not Eligible		
87	Q	Residential care activities	Eligible	*waste management *safety issues *chemical usage	Low
88	Q	Social work activities without accommodation	Eligible	no adverse impacts	Low
<b>Recreation</b>					
90	R	Creative, arts and entertainment activities	Eligible	*waste management *safety issues *chemical usage	Low
91	R	Libraries, archives, museums and other cultural activities	Eligible	no adverse impacts	Low
93	R	Sports activities and amusement and recreation activities	Eligible	*safety issues	Low



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Code	Parent	Description	Eligibility	Primary Impact	Assessment Level
<b>Personal Service</b>					
94	S	Activities of membership organisations	Not Eligible		
95	S	Repair of computers and personal and household goods	Eligible	*waste management *safety issues *chemical usage	Low
96	S	Other personal service activities	Eligible	*waste management *safety issues *chemical usage	Low
<b>Household Activities</b>					
97	T	Activities of households as employers of domestic personnel	Eligible	no adverse impacts	Low
98	T	Undifferentiated goods- and services-producing activities of private households for own use	Not Eligible		
<b>Extraterritorial Organizations</b>					
99	U	Activities of extraterritorial organisations and bodies	Not Eligible		



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## Annex J: Environmental Screening Form for categorization of the proposed sub-grant activities under component 1B - incubation

Project Name

Project Details in Brief:

Project location/s:

Project Details				
Sl.no	Components	Details		
1	Project components			
2	Details of Alignment / Components (main components including construction activities)			
3	Location of the Project Sites & Current Land use, any historic land use, ownership status			
4	Screening Category according to the Ministry of Environment and Urbanization – Turkish EIA Legislation (Annex II or No Annex)			
5	Does the project involve machinery/equipment investment? Please explain respective E&S impacts.			
6	Is there any construction/renovation activities in the scope of the project? Please explain E&S impacts.			
Screening questions				
	Proposed Resources	Details		
1.	Estimated energy consumption for the project activities – Source wise			
2.	Estimated usage of water quantity for the project: Ground Water and Surface water?			
3.	Is the project site located on or adjacent to any residences, schools, hospitals, sensitive receptors? (in km)			
	Impacts	Yes/ May Create	No	Details
4.	Will the activities have proposed at the site(s) impact water quality (surface or underground) and water resource availability and use?			
5.	Will the project necessitates cutting of trees / Loss of Vegetation?			
6.	Will the project result in Health & Safety Risks in the neighborhood including the release of toxic gases, accident risks			
7.	Will the project result in health and safety risks to the employees?			



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8.	Potential disruption to common property, accessibility, traffic disruptions within the subproject area?			
9.	Will the project use or store dangerous substances (e.g. large quantities of hazardous chemicals/ materials like Chlorine, Diesel, Petroleum products; any other?			
10.	Will the project produce solid or liquid wastes; including construction/demolition wastes; polluted liquids?			
11.	Will the project cause or increase air pollution or odour nuisance?			
12.	Will the project generate or increase noise levels which will impact surrounding biodiversity or communities?			
13.	Is there a potential for release of toxic gases or accident risks (e.g. potential fire outbreaks)			
14.	Describe any other features of the project that could influence the ambient environment			

This Screening sheet must be completed for each of the proposed sub-project and forwarded to the Environment Specialist in Respective PIU along with the following enclosures.

**Enclosures:** Provide maps with the geographical location of the project; and an appropriately scaled map clearly showing the project area and project sites with land use, existing buildings, infrastructure, vegetation, adjacent land use, utility lines, access roads and any planned construction, and any other information to describe the project, locations and possible impact as required.

**Project Categorization and Need for Safeguards Instruments, Oversight**

<b>Project Category</b>	<input type="checkbox"/> Moderate <input type="checkbox"/> Low
<b>Key Reasons</b>	
<b>Safeguards Instruments Required</b>	<input type="checkbox"/> No safeguards instruments required <input type="checkbox"/> Site-specific ESMP

<b>Status</b>	<b>Agency / CIP</b>	<b>Name, Signature with Date and Seal</b>
<b>Prepared by</b>	Environmental Specialist	
<b>Checked and Categorized as low, moderate by</b>	PIU	
	Environmental Specialist	



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<b>Reviewed &amp; accepted by</b>	PIU	
	Environmental Specialist	



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## Annex K: Sample Grievance Register and Grievance Close Out Form

GRIEVANCE REGISTER FORM			
Name of Person receiving grievance:			Date:
Title:			
<b>INFORMATION ABOUT COMPLAINANT</b> <i>(Do not fill if the complainant wishes to stay anonymous)</i>		<b>Ways of Receiving Grievance</b>	
Name – Surname		Phone	<input type="checkbox"/>
Phone number		Meetings	<input type="checkbox"/>
Address		Application to Office	<input type="checkbox"/>
Village		Mail/email	<input type="checkbox"/>
Signature (if possible)		Field visit	<input type="checkbox"/>
		Other: .....	<input type="checkbox"/>
<b>DETAILS OF GRIEVANCE</b>			



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<b>GRIEVANCE CLOSE-OUT FORM</b>		
<b>ASSESSMENT OF THE GRIEVANCE</b>	Expropriation	<input type="checkbox"/>
	Damages to households or livelihoods	<input type="checkbox"/>
	Environmental and social	<input type="checkbox"/>
	Employment	<input type="checkbox"/>
	Other	<input type="checkbox"/>
<b>Compensation Required:</b>	<input type="checkbox"/> <b>YES</b>	<input type="checkbox"/> <b>NO</b>
<b>RESULT</b>		
<p><b>CLOSE OUT</b></p> <p><i>(This part will be filled in and signed by the complainant and the Community Liaison Officer (CLO) assigned by the sub-borrower when he/she receives the compensation or file is closed-out. (Instead of taking the signature of the complainant, bank receipt can be documented with the form)</i></p>		
<b>Responsible</b>	<b>Complainant</b>	
Name-Surname	Name-Surname	
Date and Signature	Date and Signature (If possible. Reasons of non-signing should be explained)	