Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 12/04/2019 | Report No: ESRSA00376
BASIC INFORMATION

A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Turkey</td>
<td>EUROPE AND CENTRAL ASIA</td>
<td>P171489</td>
<td></td>
</tr>
</tbody>
</table>

Project Name: Support to Refugees Transitioning to Communities Project

Practice Area (Lead) | Financing Instrument | Estimated Appraisal Date | Estimated Board Date
Social               | Investment Project Financing       |                        | 12/4/2019

Borrower(s) | Implementing Agency(ies)
Turkish Red Crescent | Turkish Red Crescent

Proposed Development Objective(s)
The proposed development objective is to support the transition of refugees to community living in target provinces in Turkey.

<table>
<thead>
<tr>
<th>Financing (in USD Million)</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Project Cost</td>
<td>1.32</td>
</tr>
</tbody>
</table>

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?
No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

Turkey has achieved commendable economic and social development results since the early 2000s, raising it to the world’s 17th largest economy and establishing it as a global presence. Macroeconomic stability, broad social and economic reforms, closer economic ties with the European Union (EU), and a transformation of a significant part of the economy away from agriculture into manufacturing and services were core contributors to Turkey’s growth. Despite being hit by adverse shocks in 2016, the economy has shown notable resilience: growth in 2017 was at 7.4 percent, supported by a substantial fiscal and monetary stimulus. However, the economy entered a challenging period in mid-2018 with output contracting, unemployment rising, and inflation at close to 20 percent. Tight monetary policy and the release of a New Economic Program (NEP) in September 2018 provided some confidence to
investors after a period of intense market volatility. But the economy remains vulnerable to market sentiments and the focus now is on implementation of critical reforms to sustain Turkey’s development achievements. Turkey’s current Government was formed in July 2018, following national elections held in June 2018. In September 2018, the Government launched the NEP, which sets out Turkey’s macro-fiscal and structural reform strategy and is a comprehensive statement of the Government’s policy intent for the near-term. In parallel, the parliament approved Turkey’s 11th Development Plan for the 2019-2023 period, which sets out the longer-term structural Reforms needed to address Turkey’s development challenges, such as improving productivity, tackling energy supply security and energy efficiency to ensure sustained growth, and building the skills of its population to reap the benefits of greater global integration.

Turkey is both a transit and target country for migrants and refugees. Globally, the country hosts the highest number of refugees seen in the recent years. 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 under temporary protection, there are an estimated 400,000 asylum seekers and refugees from other nationalities. The country’s policy 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. The efforts of the government and international partners have been geared primarily towards facilitating refugee access to basic services and economic opportunities, while strengthening the capacity and responsiveness of public institutions at the national and local levels. As of October 2019, more than 3.6 million Syrian refugees (97.5 percent) were living among host communities [Directorate General of Migration Management (DGMM), 2019]. Approximately 63,000 refugees remained in seven temporary accommodation centers (TACs) located in five provinces. The government’s policy is to provide accommodation primarily for refugees who have special assistance needs.

In 2019, the government introduced the country’s first framework on refugee inclusion, namely the National Harmonization Strategy Paper and Action Plan. The strategy identifies priorities for ministries, central government agencies, municipalities, and non-governmental organizations on inclusion of Syrians in municipal services, education, healthcare, social services, and local economies. The strategic approach is focusing on harmonization of refugees, migrants and host communities based on six priority areas: social cohesion, information, education, health, labor market, and social services. The government is aiming to standardize information and counselling services with new tools and processes and establish face-to-face counseling capacity to ensure provision of reliable information and guidance for migrants and refugees.

Refugees in Turkey are generally not aware of their rights and responsibilities and lack knowledge about the services they are entitled to and/or how to access them. They have limited information about life in Turkey as they do not have first-hand experience with the local systems, services and procedures. While the refugees’ social networks are well-established in Turkey, often the existing social environment cannot provide accurate information to help them navigate in an unfamiliar socio-economic context. The absence of such can create gaps between the host communities and have a negative impact on socio-economic situation of the host communities. Most refugees in TACs have lived in camp-settings since 2012 and lack psychological readiness, sufficient information and life skills to cope with independent living and pursue their inclusion in Turkish society. They also have limited access to training and counselling to enhance their livelihoods skills and effectively pursue independent life in Turkey. Their main challenges include (i) lack of information on available support services outside of TACs, (ii) finding affordable housing, (iii) accessing livelihoods opportunities and jobs, (iv) falling victim to fraud and financial abuse while searching for housing.
and jobs, and (v) lack of basic life and social skills suited to the Turkish context. There is a high demand among Syrians in Turkey to receive information and counselling services, including psycho-social support.

The project is aligned with the overall objective of the World Bank Country Partnership Framework (CPF) for Turkey (FY18-21) to assist the country to achieve more sustainable and inclusive growth. The project will support the transition of refugees from camps and help them pursue their socio-economic inclusion in host communities through provision of information, counselling and referrals to basic services and economic opportunities. The project will also provide psycho-social support and contribute to social cohesion between refugees and host communities. Accordingly, the project aligns with CPF Focus Area 2: Inclusion, which seeks to support better integration of women, youth and Syrians under Temporary Protection. With its focus on female-headed refugee households and refugee women and girls, the project will also have a strong gender aspect which is considered a key area in the CPF. The project is consistent with the World Bank’s twin goals of eliminating extreme poverty and boosting shared prosperity. Project beneficiaries will include some of the poorest refugees in provinces that are highly impacted by refugee presence in the country. The World Bank’s development response to forced displacement aims to help refugees and host communities offset the impact of displacement through socio-economic development in the host communities. The proposed project aligns well with the provisions of Turkey’s 11th Development Plan. The plan sets out the longer-term structural reforms to be pursued in order to address Turkey’s development challenges. Within this context, the plan contains provisions to improve refugees’ socio-economic inclusion and access to services, particularly focusing on access to education, social and cultural harmonization (of children and youth) and improving skills and readiness to promote access to economic opportunities.

In this context, the proposed project will (i) provide information, counselling and referral services to refugees and (ii) refer refugees to available mainstream socio-economic support services. The Project will primarily target (a) refugees living in Adana (Sarıçam TAC), Hatay (Altinözü and Yayladağı TACs), Kahramanmaraş (Merkez TAC), and Kilis (Elbeyli TAC) who want to relocate to communities in target provinces and (b) refugees who have recently relocated from TACs to target project provinces. The preliminary assessments and consultations with refugees and key stakeholders indicate that the decision for relocation is based on several factors such as availability of cash assistance, prospects for jobs, economic opportunities, and family and social connections in the desired community of relocation. Given that relocation to communities from TACs is voluntarily and DGMM approves relocation applications on a first-come-first-serve basis, it is not possible to estimate the number of beneficiaries who would be relocating or the provinces of relocation. Therefore, the Project will apply a flexible beneficiary targeting approach to ensure that services are available to the following sub-categories of refugee beneficiaries: (i) Refugees living in TACs who apply for relocation (or who have recently relocated) to a target project province; (ii) Refugees living in TACs who want to relocate to another province where TRC has a Community Center; (iii) Refugees living in TACs who want to relocate to a province without a TRC Community Center; (iv) Refugees who want to relocate to another TAC; and (v) Refugees residing in target project provinces who never lived in a TAC who are interested in harmonization activities. In addition, through social cohesion activities, the Project will also reach other refugees and host community members.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]

The project will pilot the delivery of information, counselling and referral services aimed at assisting refugees pursue independent lives amongst host communities. The project will target the following provinces that host TACs: Adana
(Sarıçam TAC), Hatay (Altınözü and Yayladağı TAC), Kahramanmaraş (Merkez TAC), and Kilis (Elbeyli TAC). Combined, these TACs accommodate around 45,500 refugees (DGMM, 2019). Based on project performance and implementation progress and availability of funds, the project could be extended to other provinces and new support activities might be added.

The TACs are protected zones with security personnel; but residents of TACs can leave the TACs between 6:00 AM in the morning until night time, 11:30 PM. They have multiple-entry rights; but have to return by nighttime to the TAC, otherwise they are reported to gendarmerie. The refugees can take temporary visit permits which allow them to travel to another city or camp. Most of the refugees in camps have been living in camp-settings since 2012 and are mostly dependent to humanitarian support and social assistance. Women and youth constitute the majority of TAC population, with more than half being below the age of 18, and close to 20 percent of camp-based household headed by women. The majority of refugee women in camps are not economically active and do not leave the camp facilities often.

The government’s plan is to offer accommodation in TACs only to those who are considered to have special assistance needs. Refugees can voluntarily decide whether or not to leave TACs. Between August 2018 and August 2019, DGMM, with the support of United Nations High Commissioner for Refugees (UNHCR), has implemented the alternatives to camps program and has closed several tented facilities and TACs, and assisted approximately 100,000 refugees to relocate in urban areas or relocate to another TACs that offer more advanced facilities and services. Refugees, particularly those who live or have lived in TACs, lack psychological readiness, knowledge of accessing available services, and life skills to cope with independent living. They have limited access to training and counselling to enhance their livelihoods skills and effectively pursue independent socio-economic inclusion in Turkish society. Many of the activities that the project would support are embedded within pre-existing programs and processes which the project seeks to expand or enhance. The number of beneficiaries targeted by the project for transition into communities from TACs are a small fraction of the overall refugees already in communities. The social risk rating is moderate with due consideration for this limited potential for adverse effects from project investments.

The refugee hosting situation in Turkey has become more protracted since the outbreak in 2011 and susceptible to economic challenges, additional influxes, and changes to the security and political dynamics of the region. The following social risks and impacts have been identified through stakeholder consultations and literature review.

Disinformation and fraud are widely cited as risks for new Syrian refugees, including those departing from TACs. Refugees may be taken advantage of when seeking housing and other services due to their limited knowledge of navigating Turkish society. Disinformation and predatory practices can cause social tensions both between refugee and host communities and within the refugee communities. The project aims at addressing the associated risks and issues by providing information, counseling, and referral services to minimize instances of such risks. Further, refugee to refugee and refugee to host networks fostered through social cohesion and volunteerism supported by the project are meant to strengthen support networks and social ties between refugees and host communities.

D. 2. Borrower’s Institutional Capacity
The implementing agency for the project is TRC. TRC will establish a Project Implementation Unit (PIU), under the Community Based Migration Programs (mapped under the Migration Services Department operating under the Deputy General Directorate for International Relations and Migration Services of TRC), which will have overall responsibility for project implementation, coordinating activities on the ground, and monitoring and reporting. At the
public disclosure

provincial level, beneficiaries will be referred to TRC Community Centers, which provide a variety of socio-economic empowerment support services. The project will leverage TRC’s existing implementation and outreach capacity.

TRC activities include national disaster management, blood services, international support, social services, health services, first aid, education and youth services and migration and refugee services. Through Community Centers, the TRC provides protection support (provision of ESSN assistance, Conditional Cash Transfer for Education, and Special Needs Fund, and Individual Protection Aid), livelihoods support services, psycho-social support and health services, and social cohesion activities (described further below). Some of these services are established with international certification. These include, OHSAS 18001:2007 and ISO 9001:2008 certifications for mineral water operations management, ISO 9001:2015 and ISO 10002:2014 for blood services, and ISO 9001:2015 for hospital services. There is a Code of Conduct, jointly regulating the IRC and TRC, together with internal OHS procedures in place as part of their HR policy. TRC also has a well-established feedback procedure for beneficiaries of TRC aid and services. TRC has a well-established GRM, called Complaints and Response Mechanism (CRM) that is operational in Community Centers. TRC is subject to Turkish national laws and regulations. TRC implements Community Engagement and Accountability (CEA) mechanisms to provide timely, relevant and actionable information to communities. TRC’s mechanisms have been developed in partnership with International Committee of the Red Cross (ICRC) and the International Federation of Red Cross and Red Crescent Socialites (IFRC).

TRC has been the main implementing agency in delivering comprehensive services to refugees since the onset of the crisis. TRC has field presence in all refugee hosting provinces in Turkey. It is also the implementing entity of the ESSN program (implemented in partnership with World Food Programme), which provides cash payments to more than 1.5 million Syrian refugees. TRC is also the implementing agency of the Conditional Cash Transfers for Education program, and the Special Need Fund and Individual Protection Aid. TRC is considered a high capacity institution and has experience in delivering humanitarian and socio-economic empowerment support interventions in Turkey and abroad. TRC is a member of the International Federation of Red Cross and Red Crescent Societies (IFRC) and has been a leading humanitarian organization providing a wide range of services (protection, health and psychosocial support, livelihoods support, and social cohesion) to Syrian refugees, other migrant and refugees, and Turkish citizens. TRC is also an active organization in responding to displacement crises in other countries (i.e. Bangladesh, Somalia and Syria).

Through community centers, TRC provides protection support (provision of ESSN assistance, Conditional Cash Transfer for Education, and Special Needs Fund, and Individual Protection Assistance), livelihoods support services, psycho-social support and health services, and social cohesion activities. From 16 community centers in total, 14 is funded by the EU, Kocaeli center is funded by Qatar Charity and Bursa center is funded by Norwegian Red Cross. The community centers have been successful in delivering comprehensive support services to refugees and host communities in Turkey. The centers provide vocational and technical skills trainings, Turkish courses, livelihoods support, psyco-social support, nutrition and health education, referral to health services, advocacy and protection services, and social cohesion activities to contribute to socio-economic inclusion of refugees and host communities. The activities are implemented within the scope of TRC’s Community-based Migration Program to improve the psychological, social and economic conditions of international and temporarily protected migrants to recover and to develop common living culture with local community. The facilities have child friendly and youth friendly spaces. There are 16 community centers in the cities of Şanlıurfa, Istanbul (2), Konya, Ankara, Kilis, Bursa, İzmir, Adana, Mersin, Gaziantep, Hatay, Kayseri, Kahramanmaraş, Kocaeli and Mardin. To date, more than 31,110 people have benefitted from vocational
trainings; 338,884 from PSS; 305,140 from harmonization with local community and social & cultural activities through 16 TRC Community Centers that also service host communities.

While the proposed project will be the first operation that TRC will implement under World Bank operational policies or ESF, all of the activities that will be financed under the project have already been implemented by the TRC with a positive track record without significant gaps with requirements of ESSs. As part of the services delivered at the Community Centers, TRC has been implementing a satisfactory grievance mechanism and various stakeholder engagement activities on a regular basis. TRC’s grievance and stakeholder engagement processes have been developed in partnership with the ICRC and IFRC. TRC is also experienced with implementing stakeholder engagement activities through various channels. The Bank will nonetheless continue to provide a close supervision support to ensure compliance with ESSs.

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

A. Environmental and Social Risk Classification (ESRC)

Environmental Risk Rating

The environmental risk is rated as low. The project activities mainly include conducting training on social integration of the refugees into the host communities and workshops. The project will not finance civil works. Therefore, its potential risks for natural environment are minimal or negligible.

Social Risk Rating

The social risk is at appraisal stage is rated as Moderate. Overall, the project will have positive social impacts as it aims to improve the basic life skills of refugees to help them become self-resilient and self-reliant. The project will not involve finance any civil works thus no land acquisition or impact on private asset loss is expected. Risks related to labor, community health and safety, cultural heritage related risks and impacts are also rated low. While the counselling and other activities that the project provides are potentially sensitive, especially given the complex contextual risks surrounding the project, the risk is considered moderate because the TRC has been implementing all project activities with positive track record without any known gaps with requirements of the ESSs. There is a risk that the TACs that will not receive project support may feel unfair treatment or marginalization. With consideration for the current budget deficit, it was agreed that project would be launched in four priority provinces of Adana, Hatay, Kahramanmarash and Kilis, and would be scaled up to include other provinces starting with Osmaniye if additional financing can be secured. The risk associated with leaving Osmaniye TAC out at the onset of the project due to funding shortage will be mitigated through a targeted communications campaign covered under the stakeholder activities as part of TRC’s Stakeholder Engagement Plan and active resource mobilization by the World Bank task team, government and the TRC.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts
Overview of the relevance of the Standard for the Project:

The project will improve refugees’ readiness for independent living amongst communities by enhancing their knowledge and awareness of life in Turkey through information and counseling services and make referrals to socio-economic empowerment services, including Turkish courses, vocational and technical skills trainings, livelihoods support programs, and psycho-social support. The project will target the following provinces that host TACs, namely Adana (Sarıçam TAC), Hatay (Altınözü and Yayladağı TAC), Kahramanmaraş (Merkez TAC), and Kilis (Elbeyli TAC). Combined these TACs accommodate approximately 45,500 refugees. Based on project performance and implementation progress and availability of funds, the project could be extended to other provinces, starting with Osmaniye, and new support activities might be added. Project activities will also target community-based refugees and host community members.

The project activities are focused on training and workshops that would support the socio-economic inclusion of the refugees into the host communities. Therefore, no adverse environmental risks and impacts on human populations and/or the environment are anticipated. The project will exclude any activities that are outside the specified activities in the project description. As a result, no project specific environmental assessment studies are required. Whereas, on social side, while the counselling and other activities that the project provides are potentially sensitive, especially given the complex contextual risks surrounding the project, the risk is considered moderate because the TRC has been implementing all project activities with positive track record without any known gaps with requirements of the ESSs.

Although at this stage, the estimated number of beneficiaries are not known, as explained above, the social risks are moderate and manageable by the DGMM and TRC, as the transitioning from TACs to urban settlements is ongoing on a voluntary basis. However, there might be a group of people who do not want to transition to urban settlements and prefer staying in the safe zone, TACs. The project will only focus its activities in TACs on those who have opted to leave the TACs and are in transition to communities or those who have recently relocated to communities. During the site visits to Cevdetiye TAC (Osmaniye province), Altınözü TAC (Hatay province) and Merkez TAC (Kahramanmaraş), it was recorded that most of the refugees are informed about the transition program and expecting to transition to urban settlement at some point of time. The project is expected to have positive impacts as it will provide a package of services to assist refugees with independent living in the communities. These services aim to increase the self-resilience of refugees by providing them psychological counselling, basic life skills training, and trainings on women’s and children’s rights, gender-based violence, health and nutrition, legal rights, and job search counseling. TRC in coordination with governmental authorities will carry out necessary health and safety checks for refugees who want to relocate from TACs and settle in communities. Influx from TACs to host communities is not a significant issue as large influxes took place from Syrian border when the crisis erupted after 2011. Since the project beneficiaries are the vulnerable groups of the refugee communities special support mechanisms and feedback procedures will be established in order to allow their participation to the project activities and measures will be taken in line with their specific needs, such as women and girls may necessitate special designated areas to receive the training/support services within the TACs. Similarly, for refugees with disabilities the project will ensure that there are specific measures taken to support their livelihood enhancement.

There are no associated facilities related with the project.
The following is the list of data and information that were used for the assessment of social and environmental risks described above:

- International Crisis Group. 2018. ‘Turkey’s Syrian Refugees: Defusing Metropolitan Tensions’ Europe Report N°248. A 2018 WFP survey cites 75 percent of Turkish respondents do not agree that they can live in peace with Syrians and a majority opposes the rights to access jobs or for Syrians to start their own businesses (73%). WFP, Social Cohesion in Turkey: Refugee and host community online survey, rounds 1-2-3, July 2018. Available at: https://data2.unhcr.org/en/documents/download/70022

**ESS10 Stakeholder Engagement and Information Disclosure**

TRC prepared a project-specific Stakeholder Engagement Plan (SEP) which includes engagement for both project-affected parties (PAPs) and other interested parties (OIPs). The draft version of the SEP was publicly disclosed in country on TRC official website on November 1, 2019. SEP describes the timing and methods of engagement with stakeholders, identify stakeholders and plan for an engagement process in accordance with ESS10. For the purpose of the SEP: (a) the Project-affected parties/ beneficiaries (PAPs) are Refugees in TACs and refugees who recently relocated to communities; Women Refugees who live in TACs or who have recently relocated from TACs; Children refugees who live in TACs or who have recently relocated from TACs; Vulnerable groups who live in TACs or who have recently relocated from TACs; Other refugees; Host community members; TAC Muhtars; Muhtars; and Beneficiaries of TRC Community Centers; (b) Other interested parties (OIPs) include DGMM; Provincial Directorates of Migration; TAC Management; Municipalities; UNHCR; Development Partners; TRC Child Programme; Service provider NGOs; and Development Partners.

As part of the services delivered at the Community Centers, TRC has been implementing a satisfactory grievance mechanism and various stakeholder engagement activities on a regular basis. TRC’s grievance and stakeholder engagement processes have been developed in partnership with the IFRC. TRC is also experienced with implementing stakeholder engagement activities through various channels. TRC’s CRM allows beneficiaries to submit any feedback or demand, or grievances, including in an anonymous way, if requested. TRC has been running stakeholder
engagement activities in TACs with various information channels accessible to these refugee groups since the foundation of Community Centers. TRC will utilize its own beneficiary feedback procedures which are compliant with the Bank’s GRM standards. TRC will ensure that the project related grievances and requests are logged and can be tracked from its existing database.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

The direct workers are TRC employees. They are full-time employees or employees who are hired for a specific period. TRC restricts any type of child and forced labor in its HR policy. The project will not engage Contracted Workers, Primary Supply Workers or Community Workers. The project will not engage part-time, temporary, seasonal and migrant workers. TRC is bind to the Turkish Labor Code. TRC’s HR policy indicates that there is a worker’s representative dealing with employee related problems, issues. TRC has Operational Health and Safety (OHS) protocols in place and a Code of Conduct which is jointly prepared and implemented to both ICRC and TRC employees. 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.

TRC prepared a Labor Management Procedure (LMP) which provides a summary of applicable national legislation, internal TRC procedures/rules and description of a grievance redress mechanism (GRM) for workers engaged in the project. The LMP was disclosed in-country on TRC website on November 1, 2019.

ESS3 Resource Efficiency and Pollution Prevention and Management

Not relevant as the project components do not include any project activities triggering this ESS.

ESS4 Community Health and Safety

This standard is not relevant as community health and safety risks and impacts associated with project activities are not expected. Potential health risks are routinely monitored and mitigated at the TACs. Refugees transitioning from TACs to urban settlements are also routinely checked for communicable diseases and other health risks.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The project activities will not involve any type of land acquisition, restrictions on land use and involuntary resettlement. Therefore, this standard is not relevant.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources
Project activities will not affect wildlife, habitats and/or living natural resources. Therefore, this standard is not relevant.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities
The project does not involve any indigenous groups. Therefore, this standard is not relevant.

ESS8 Cultural Heritage
Project activities having significant impacts on cultural heritage will not be eligible for financing within the scope of the project. Therefore, this standard is not relevant.

ESS9 Financial Intermediaries
Not relevant as the project will not be implemented through financial intermediary.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways  No

OP 7.60 Projects in Disputed Areas  No

III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

<table>
<thead>
<tr>
<th>DELIVERABLES against MEASURES AND ACTIONs IDENTIFIED</th>
<th>TIMELINE</th>
</tr>
</thead>
<tbody>
<tr>
<td>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</td>
<td>12/2019</td>
</tr>
<tr>
<td>Establish and maintain a Project Implementation Unit (PIU) with qualified staff and resources to support management of E&amp;S risks, a Safeguards Officer responsible for the day-to-day implementation of the SEP and LMP. In accordance with World Bank’s ESSs, TRC will share the Terms of Reference for the Safeguards Officer who will oversee the implementation of ESCP including with regard to SEP and LMP and provide inputs related to stakeholder engagement activities, project related grievances.</td>
<td>12/2019</td>
</tr>
<tr>
<td>MANAGEMENT TOOLS AND INSTRUMENTS</td>
<td>01/2020</td>
</tr>
<tr>
<td>No standalone management tools are developed for ESS1. Social risks are addressed through project designs and the SEP. TRC will implement the SEP and operate the GRM as described in the SEP. The Recipient will develop the Project Implementation Manual (PIM) to provide details on social risk management applied under the project including the implementation of the SEP</td>
<td>01/2020</td>
</tr>
</tbody>
</table>
**ESS 10 Stakeholder Engagement and Information Disclosure**

<table>
<thead>
<tr>
<th>Implement SEP throughout project implementation</th>
<th>03/2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operate the GRM as described in the SEP.</td>
<td>03/2021</td>
</tr>
<tr>
<td>Ensure project information disclosure to stakeholders and project beneficiaries in the relevant local languages, in a manner accessible and culturally appropriate, considering any specific needs of Turkish host and refugee communities.</td>
<td>03/2021</td>
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**ESS 2 Labor and Working Conditions**

<table>
<thead>
<tr>
<th>Implement LMP throughout project implementation</th>
<th>03/2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>GRIEVANCE MECHANISM FOR PROJECT WORKERS: Maintain and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2, including provisions on ensuring reporting cases of child and forced labor.</td>
<td>01/2020</td>
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</tbody>
</table>

**ESS 3 Resource Efficiency and Pollution Prevention and Management**

<table>
<thead>
<tr>
<th>ESS 4 Community Health and Safety</th>
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<tr>
<td>ESS 5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</td>
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<td>ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources</td>
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<td>ESS 7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities</td>
</tr>
<tr>
<td>ESS 8 Cultural Heritage</td>
</tr>
<tr>
<td>ESS 9 Financial Intermediaries</td>
</tr>
</tbody>
</table>

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

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

Areas where “Use of Borrower Framework” is being considered:  
No areas are considered to be used for Borrower’s framework.

**IV. CONTACT POINTS**

World Bank  
Contact: Murat Fatin Onur  
Title: Social Development Specialist
Borrower/Client/Recipient
Borrower: Turkish Red Crescent

Implementing Agency(ies)
Implementing Agency: Turkish Red Crescent

V. FOR MORE INFORMATION CONTACT
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Telephone: (202) 473-1000
Web: http://www.worldbank.org/projects

VI. APPROVAL
Task Team Leader(s): Murat Fatin Onur