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

Appraisal Stage | Date Prepared/Updated: 27-Dec-2016 | Report No: PIDISDSA20157



BASIC INFORMATION

A. Basic Project Data

Country Turkey	Project ID P162004	Project Name Education Infrastructure for Resilience (EU Facility for SuTP)	Parent Project ID (if any)
Region EUROPE AND CENTRAL ASIA	Estimated Appraisal Date 30-Sep-2016	Estimated Board Date 30-Dec-2016	Practice Area (Lead) Social, Urban, Rural and Resilience Global Practice
Lending Instrument Investment Project Financing	Borrower(s) Ministry of National Education	Implementing Agency Ministry of National Education - Real Estate and Construction Department	

Proposed Development Objective(s)

The objective of the Project is to support Turkey to improve access to education for Syrians under Temporary Protection and host communities by expanding disaster resilient education infrastructure in priority provinces.

Components

Supporting School Infrastructure Investments
Enhancing Quality Learning Environment
Project Management and Technical Capacity Building for Infrastructure
Front-end Fee

The processing of this project is applying the policy requirements exceptions for situations of urgent need of assistance or capacity constraints that are outlined in OP 10.00, paragraph 12.

Yes

Financing (in USD Million)

Financing Source	Amount
Free-standing TFs for ECA CU6 Country Unit	159.41
Total Project Cost	159.41

Environmental Assessment Category

B - Partial Assessment



Decision

The review did authorize the preparation to continue

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Other Decision (as needed)

B. Introduction and Context

Country Context

Turkey has become one of the world's largest refugee hosting country, as a result of the Syrian influx taken place over the last five years. As of July 2016, there are some 2,75 million Syrians with the status of under temporary protection (SuTP) residing in the country, and only a small share (~10%) living in camps, while the rest (90%) are living outside camps, mostly in urban areas. The total number of SuTP may seem modest when placed against Turkey's total population of 76.6 million; however this population represents a significant percentage of the population of border provinces such as Hatay, Gaziantep, Sanliurfa, and Mardin; a non-negligent (and growing) percentage in Istanbul, with some towns are now home to as many Syrians as Turks, while in others, Syrian refugees predominate such as Kilis. The Ministry of National Education (MoNE) is mandated by law to provide free access to education to all school-aged SuTP in terms of facilitating education services. Furthermore, it is stated in the MoNE's Strategic Plan for 2015-2019 under Strategy 7 that 'Necessary measures shall be taken to integrate school aged refugees, displaced and stateless individuals into public education system during their stay in Turkey'. In order to adhere to such commitment, to date, around 400 temporary education centers (TECs), serving 280,000 Syrian children, have been established by MoNE in densely SuTP populated areas.

Sectoral and Institutional Context

Meeting the growing demand for education facilities and quality learning environment to accommodate the needs of SuTP calls for a programmatic approach that builds on and complements ongoing efforts of the Government. Construction and Real Estate Department of MoNE is responsible for the construction of new education facilities and strengthening and maintenance of existing schools. In light of the Government's interest to scale up the experiences in Istanbul, the World Bank and MoNE have already started to build the capacity of the Construction and Real Estate Department to fast-track planning and implementation of school retrofitting activities. Adding a work stream related to the construction of new schools for SuTP does not only offer a window of opportunity to reduce transaction costs and ensure timely implementation, it would also further ensure sustainability of investments as it is an integrated part of the Government's overall education infrastructure program. Harmonization, collaboration, and cooperation with fellow units of MoNE are key to developing a holistic approach exceeding those posed



by solely infrastructure needs. In this vein, General Directorates of Lifelong Learning and Support Services of MoNE undertake vital roles in tailoring needs-based and demand-driven activities which ensure new education facilities to be built in the scope of the Project benefit from access support programs for students/trainees such as transportation and translation services. Planning and coordination with other specialized partners (e.g., UN and bilateral agencies) will guarantee a coordinated community-school engagement for safety, social support and sustainable use of school spaces; and other cross-sector SuTP services best delivered to beneficiaries.

C. Proposed Development Objective(s)

Note to Task Teams: The PDO has been pre-populated from the datasheet for the first time for your convenience. Please keep it up to date whenever it is changed in the datasheet.

Development Objective(s) (From PAD)

The objective of the Project is to support the Government of Turkey to improve access of Syrians under Temporary Protection (SuTP) and their Turkish peers to education by expanding education infrastructure in priority provinces.

Key Results

D. Project Description

The proposed project would be implemented through four Components: (i) supporting infrastructure investments; (ii) enhancing quality learning environment; (iii) improved service delivery and capacity building for complementary services; and (iv) project management, M&E and technical capacity building for infrastructure.

Component 1: Supporting School Infrastructure Investments (US\$ 149 million). The objective of Component 1 is to support the expansion of school learning spaces for SuTP. This Component will finance priority formal and non-formal education facility construction investments and the required preparatory activities such as land analysis, design review and supervision of construction. Constructions of schools to be financed under this Component are expected to not only provide access to education, but also to contribute to better learning environments that have positive spill-over effects on learning abilities of students/trainees

Component 2: Enhancing Quality Learning Environment (US\$ 4.45 million). The objective of Component 2 is to enhance the indoor learning environment. This Component will finance investments in equipment and furnishing required to create quality learning environment and to enable flexible use of education facilities for other activities for SuTP. These investments can include, inter alia, desks and chairs; the establishment of laboratories with proper equipment and material for various science and technical courses; language labs with equipment and systems; sports equipment and tools; IT



equipment and vocational/skills training materials. Given that the education facilities will target a diverse and changing population and may need to be used for teacher-parent meetings and education planning with SuTP and host families, the schools would benefit from flexible furniture (e.g. chairs and tables could be adjusted to different ages and equipment could be on wheels).

Component 3: Project Management, Visibility, Monitoring and Evaluation and Technical Capacity Building for Infrastructure (US\$ 4.95 million). The project will be implemented through MoNE's Construction and Real Estate Department. This will leverage the existing strong capacity of the Department, which will be able to implement the Project efficiently. Capacities will increase in the areas of procurement, financial management and disbursement, and monitoring and evaluation of the Program. The Component will be instrumental in financing required additional staffing/individual consultancy services deemed necessary by MoNE. The M&E pillar will include activities related to data collection, implementation assessments, and evaluations to ensure outcomes are met. Moreover, Component 3 will finance the required additional staffing/consultancy services deemed necessary by MoNE, equipment, software, and technical capacity-building activities, including organization of trainings and informative meetings targeting central and local level staff of MoNE. This Component shall support financing the entire communications and visibility activities to be conducted during the lifespan of the Project.

E. Implementation

A project implementation unit (PIU) will be established under the Construction and Real Estate Department of MoNE for the implementation of the project. The PIU will be responsible for the implementation of the project in compliance with Environmental and Social Action Plan (ESAP). As detailed in the ESAP, sample EMP checklists will be provided to the construction contractors and supervision engineering consultants as a part of tender documents. And the awarded contractor will be responsible for the preparation of site specific EMPs and setting up & managing the Grievance Mechanism. PIU will then supervise the contractor for successful implementation of the EMP checklists. PIU will also be responsible for summarizing the environmental and social issues related to project implementation to WB in regular progress reports.

Regarding OP 4.12 aspects, the Bank started its due diligence including screenings/rapid assessments of potential school locations to ensure that there is no non-compliance with the policy. Prior to the start of civil works, a social screening checklist (ownership, physical status, etc.) will be filled out by MoNE for each plot. In cases where the subject land plot is privately owned and triggers OP 4.12, the second and third sections of the social screening checklist including detailed information on the status and usage of the private land will be filled out by MoNE. The due diligence will be concluded once the checklists and all relevant annexes indicating that there are no social safeguards issues are complete. Shall there be any cases where OP 4.12 is triggered in a certain school plot, MoNE will prepare a RAP/ARAP compliant to the LARPF document in place. MoNE will be responsible for implementation of the project in line with WB OP 4.12.

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

The locations of the schools will be determined by MoNE according to the needs and priorities of the subject. A tentative list of cities where the schools will be constructed have been shared by MoNE.

G. Environmental and Social Safeguards Specialists on the Team

Arzu Uraz, Esra Arıkan

SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>Simple construction works with limited and insignificant impacts fall into 'Category B'. Construction of schools are not listed in Turkish EIA Regulation. Due to that reason, projects are exempted from EIA Process. During accession process to EU, a number of institutional and legislative reforms have been made by Turkey. As a result of these reforms, environmental legislations and instruments for environmental protection have been aligned with international standards. Therefore, an Environmental and Social Action Plan (ESAP) has been drafted during the preparation phase of the project in order to full fill WB Policy requirement stipulated by OP 4.01. The ESAP focuses on the gaps between the national environmental legislation related to building construction works and WB operational policies. This ESAP also includes generic impacts, related mitigation and monitoring actions (in a format called sample environmental and social management plan) in addition to relevant environmental regulations such as</p> <ul style="list-style-type: none"> • Waste Management Regulation, • Hazardous Wastes Control Regulation • Waste Oil Control Regulation, • Vegetable Waste Oil Control • Packaging Waste Control Regulation, • Waste Batteries and Accumulators Control Regulation



- Excavation, Construction and Demolition Waste Control Regulation, etc.

Natural Habitats OP/BP 4.04	No	Project locations are not defined yet. On the other hand, according to information given by borrower all the project sites will be located near to settlement centers in master plan area. Due to that reason, OP 4.04 is not triggered. However, borrower is notified that projects which has impact on any Natural Habitats are defined as ineligible.
Forests OP/BP 4.36	No	
Pest Management OP 4.09	No	
Physical Cultural Resources OP/BP 4.11	Yes	No significant impacts on physical cultural resources is anticipated, however some of the schools to be demolished for reconstruction and/or the locations selected for building new schools may have (historic) protection status given by Ministry of Culture and Tourism. The generic EMP checklist and the site specific EMPs will include information about the procedure for obtaining clearances from the Ministry of Culture and Tourism. Moreover, the EMPs will include provisions for addressing chance finds should they occur.
Indigenous Peoples OP/BP 4.10	No	
Involuntary Resettlement OP/BP 4.12	Yes	The project will unlikely involve land acquisition as it will be carried out on lands owned by or designated to MoNE for the construction of educational facilities. MoNE has selected plots with no ownership issues for the construction of 56 schools that will be funded by the Bank. Nevertheless, in case there might be plots with incomplete ownership or illegal use issues, the Bank policy on Involuntary Resettlement OP 4.12 is applied to the Project. For the project preparation, the ESAP has been drafted and a social screening form is a part of the ESAP. Prior civil works start, the social screening checklist of the ESAP) will be filled out by MoNE presenting general information on the subject land including ownership and physical status. During the implementation period and before the relevant Project activities are commenced, MoNE will prepare a LARPF. Prior to appraisal, MoNE has started to provide the



Bank with a list of land plots according to a priority list of 56 schools in 12 provinces. The Bank has also initiated its due diligence including screenings/rapid assessments of 10 education facilities in 2 provinces already to be taken as priority investments. The Bank will continue its social safeguards processes with regards to the remaining education facilities of the selected 56 school plots through a piecemeal approach during implementation phase ensuring that there are no non-compliance issues with WB OP 4.12.

Safety of Dams OP/BP 4.37	No
Projects on International Waterways OP/BP 7.50	No
Projects in Disputed Areas OP/BP 7.60	No

KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

A. Summary of Key Safeguard Issues

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

The construction works within the scope of the project are expected to have limited, reversible and insignificant impacts on environment. Therefore, the project is categorized as 'Category B'. No major impact is expected from proposed project. Regarding the impacts and mitigation measures related to construction works, Turkey improved its environmental management legislation, therefore it is not expected that there will be major gaps to fulfill WB safeguard standards. The roadmap for complying with Bank operational policies is detailed in an Environmental and Social Action Plan (ESAP) which is prepared as a guidance document during the project preparation phase.

The project is expected to have no land requirements since subject lands are already registered under MoNE as educational facility plots. No physical resettlement will take place. Since the land plot details are not known fully, and hence due diligence on the plots is not undertaken yet, a social framework document (land acquisition policy framework) will be asked by the borrower to prepare in order to mitigate any potential non-compliance issues that may appear during implementation. Informal users are not expected to be found in the plots however, the due diligence findings will document this.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area: No long term major impact and or an indirect impact is expected.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts. The locations of the schools will be determined by MoNE according to the needs and priorities of the subject.



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

In order to assess the national environmental legislation related to building construction works and to compare them with WB operational policies, an Environmental and Social Action Plan (ESAP) has been prepared during the preparation phase. This ESAP includes generic impacts, related mitigation and monitoring actions (in a format called sample environmental and social management plan). This sample environmental and social management plan (in the form of a checklist) will be a part of the construction bidding documents on MoNE. As soon as the exact locations and footprints of the school construction works are determined, and the construction contracts are awarded, the sub-project EMPs, tailored to include site-specific information, will be produced by the awarded contractors of MoNE, with support of the construction supervisor consultants of MoNE.

Since sub project locations are not shared with the Bank yet, due diligence studies have not been conducted. Where possible, Bank experts will make field trips to the plots allocated to investigate and verify that there are no social safeguards issues pertaining to OP 4.12 as declared by the borrower. Where a field trip is not possible (due to time constraints and safety limitations) MoNE will be asked to deploy its relevant provincial directorates to fill out a social screening form prepared by the Bank to provide information on the subject plots. The social screening form will demonstrate information such as, current ownership status as well as information on previous ownership, acquisition method, immovables and users on land (if any). According to the results of the due diligence, the Bank will then decide if a RAP/ARAP is necessary for certain plots. Shall there be any cases where OP 4.12 is triggered the borrower will prepare a RAP/ARAP compliant to the LARPF document in place.

MoNE has working history with the World Bank in the previous years, however this PIU (Construction and Real Estate Department), which is heavily involved in bidding and construction phases of civil works and national legislation related to environment and land acquisition, is working with the Bank for the first time. During preparation Bank team had in depth discussions with the PIU to inform about safeguards instruments and implementation practices. In MoNE, there is a unit which deals with land acquisition and digital mapping called "GIS and estate department" which was also consulted during preparation.

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

It is planned to have general public consultation meetings for the purpose of an effective stakeholder engagement. In order to avoid any negative feedback or misunderstanding from the host communities, it will be important to have a good communications strategy in place for both the SuTP communities and host communities. Having both visibility and communications bilingual (Turkish and Arabic) would be key for potential beneficiaries (parents, teachers, students etc) to easily engage and be informed about the project. As a good practice, the borrower is suggested to provide leaflets or other means of information in order to inform the communities about the new opening schools. Coordination with the community outreach programs of other services providers are also suggested to enhance citizen engagement. It is suggested that project's potential environmental and social impacts are also discussed with the public via these meetings.

Shall there be any need to prepare a RAP for any sub project, formal public consultation meetings will be held during preparation of RAPs with affected people. More broadly, community involvement will be sought through timely consultations and sub-project level grievance redress mechanisms will be set up to resolve concerns as they arise. Both consultations and grievance mechanisms will take into account the different needs and concerns of men and



women.

B. Disclosure Requirements

The review of this Safeguards has been Deferred.

Comments

The project is being processed under the Emergency Operations policy and preparation of the safeguard instruments are being delayed to implementation. In accordance with the policy, an Environmental and Social Action Plan has been prepared that provides a time-bound action plan for the preparation of the safeguard instruments during implementation. The Safeguards instruments will be prepared within 4 months of project effectiveness and before any civil works begin. The dates provided are based on this plan.

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

OP/BP/GP 4.01 - Environment Assessment

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

NA

OP/BP 4.11 - Physical Cultural Resources

Does the EA include adequate measures related to cultural property?

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

OP/BP 4.12 - Involuntary Resettlement

Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?

NA



If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?

NA

The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank's Infoshop?

NA

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

NA

All Safeguard Policies

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

NA

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

NA

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

NA

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

NA

CONTACT POINT

World Bank

Elif Ayhan
Senior Disaster Risk Management Specialist

Joel E. Reyes
Sr Institutional Dev. Spec.

Borrower/Client/Recipient

Ministry of National Education



Implementing Agencies

Ministry of National Education - Real Estate and Construction Department
Ozcan Duman
Head of Department for Construction and Real Estate
oduman@meb.gov.tr

FOR MORE INFORMATION CONTACT

The World Bank
1818 H Street, NW
Washington, D.C. 20433
Telephone: (202) 473-1000
Web: <http://www.worldbank.org/projects>

APPROVAL

Task Team Leader(s):	Elif Ayhan Joel E. Reyes
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Approved By

Safeguards Advisor:	Nina Chee	27-Dec-2016
Practice Manager/Manager:	David N. Sislen	27-Dec-2016
Country Director:	Johannes C.M. Zutt	28-Dec-2016

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