



**TURKEY**

**SUSTAINABLE CITIES PROJECT - II (P161915)**

**ENVIRONMENTAL AND SOCIAL MANAGEMENT  
FRAMEWORK**

**REVISED FINAL**

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## ANNEX

## EXECUTIVE SUMMARY

### Project Description

Iller Bank (hereinafter referred to as ILBANK) (Turkey's Bank of Provinces) and The World Bank (WB) designed the Sustainable Cities Projects (as Series of Projects, SCP I is already in implementation and this ESMF is prepared for SCP II) to establish a support mechanism for participating second tier Metropolitan Municipalities (MM) to plan and invest in a sustainable future. The Sustainable Cities Projects will establish a support system for developing cities to identify, prepare and finance bankable investments and enhance city planning capacities aimed at supporting this objective. The investments carried out through the Project will adhere to both the Republic of Turkey Environmental Regulations and the World Bank Safeguard Policies. In order to do so, the Iller Bank (ILBANK) will act as the financial intermediary to ensure that related WB policies and procedures are followed and ensure that all Turkish environmental approvals, licenses and permits have been secured. Previously, WB has financed a similar project called the Municipal Services Project (MSP), through the ILBANK. Heretofore the MSP successfully provided financing in three specific areas, including water supply, wastewater and solid waste investments for 11 participating municipalities and 2 water utilities. In this respect, the SCP I and II are the next generation operation which will provide a more dedicated focus to urban planning systems, recognizing the importance of urban planning to the sustainability of Turkey's cities.

### Objective

The Project Development Objective is to improve the planning capacity of and access to targeted municipal services in participating municipalities and [municipal utilities](#) (henceforth "utilities"). The PDO is identical to the Program Development Objective since each project in the series targets individual or groups of municipalities/utilities in ensuring improved efficiency and sustainability of service delivery. The three components of SCP I included:

Component A: Sustainable City Planning and Management Systems aimed at supporting reforms including policies and legislation that improve sustainable urban development planning including technical assistance support (i) to municipalities/utilities for planning (including urban planning and capital investment planning) and management and for the preparation of feasibility studies, environmental assessments and engineering designs for municipal sub-projects; and (ii) to Ilbank for management of the grant and capacity building;

Component B: Municipal Investments which financed demand driven municipal investments

Component C: which financed Project Management.

It is expected that this SCP II project will consist of:

Component A – Municipal Investments which will finance demand driven municipal infrastructure investments. Sectors eligible for investment include but are not restricted to public transport, water and sanitation, solid waste management, and energy. In the water sector, it is anticipated that the sub-borrower will be the utility company, with a guarantee provided by the municipality. The component will finance goods, works and consultant services. Participating municipalities and investments have not been identified as yet, as they must go through a screening process which was developed under SCP I.

Component B – Project Management which will finance goods and consultancy services for project management, monitoring and evaluation, outreach and communication.

### Investments to be Financed

Investments carried out under the SCP-II will conform to the Republic of Turkey Environmental Regulation and the World Bank Safeguards Policies (as the lead financier). ILBANK will be the implementing agency of the project, acting as a financial intermediary, will on-lend the loan proceeds to municipalities or utilities. In this capacity, ILBANK will ensure that WB policies on environment are followed as described in this framework, in addition to the Turkish requirements ILBANK would be responsible to document that all Turkish environmental approvals, permits, licenses have been secured. The potential investment areas covered under the SCP II project is presented below:

| <b>Field</b>                                    | <b>Objective/ Scope</b>   |
|---|---|
| <b>Water</b>                                    | Upgrading, rehabilitating and expanding of water supply systems to accompany urban growth and redevelopment.  |
| <b>Wastewater</b>                               | Expanding and rehabilitating collection networks, to ensure sewerage coverage in developing urban areas; investing in new wastewater treatment capacity, including for sludge management, in pursuit of environmental policy objectives.  |
| <b>Solid Waste</b>                              | Integrated solid waste management systems, including transfer, sorting, recycling, disposal (e.g. landfill development) and incineration (waste to energy).   |
| <b>Urban Transport</b>                          | Financing to support public transit systems (Bus Rapid Transit, zero-emission Trolley Buses, Cable Cars) parking facilities, transport system management improvements, pedestrianization (improved or expanded walking or bike paths and sidewalks), road construction and rehabilitation, etc. |
| <b>Energy Efficiency &amp; Renewable Energy</b> | Energy efficient systems in urban transport and municipal infrastructure systems; energy efficient buildings, solar fields, geothermal heating of buildings.  |

#### Rationale and Scope of ESMF

The World Bank's environmental and social safeguards policies require that the borrower country is expected prepare an Environmental and Social Management Framework (ESMF), integrated with the Regulation on Environmental Impact Assessment (henceforth "EIA Regulation") (Official Gazette No. 26936, October 10, 2013) and WB's Operational Policy for Environmental Assessment (OP 4.01) for the SCPs. Since the sub-project locations under the SCP II are not known at the time of appraisal, ESMF is the key document to be shared with stakeholders before implementation starts.

The ESMF forms a scope of the comprehensive environmental and social management approach that has been adopted for acknowledging the potential environmental and social impacts from the SCP II. The ESMF seeks to consolidate and facilitate understanding of all necessary policy and regulatory features of the Turkish Government as well as the World Bank's environmental and social safeguards policies that are applicable to the project. Currently, the details (location, dimension and design) of the SCP are not definite. Therefore, the detailed assessment of possible social and environmental impacts of the Project is not achievable at this time. However, the ESMF

will cover the entire related environmental and social framework from the previous SCP project and include the impacts of the new financing options as well. The ESMF serves as an overall and systematic guide covering policies, procedures and provisions that are to be integrated with the overall project period to ensure that the social and environmental issues are systematically addressed at the sub-project stage. Furthermore, the ESMF provides technical inputs and guidance for the SCP from an environmental and social management perspective. Therefore, the application and implementation of the ESMF will guide the integration of social and environmental aspects into the decision making process of all stages related to planning, design, execution, operation and maintenance of sub-projects, by identifying, preventing and /or minimizing adverse social and environmental impacts early – on in the project cycle.

WB's environmental and social assessment procedures and Turkish legislation, and key gaps and ways to close these gaps are presented in this ESMF. The procedures are separately discussed in the following sub-sections: Screening, Environmental Assessment, Public Consultation, Scoping, Review of environmental and Social Impact Assessment, Disclosure, Monitoring and Inspection.

OP 4.01, 4.04, 4.12, 4.11, 4.37 were triggered for SCP II Project. With regard to OP 7.50, ILBANK is responsible for ensuring that the sub-projects financed are located and dependent on national waterways only. The waterways identified as NOT an international waterway (do not trigger OP 7.50) in Turkey are the following: Susurluk, North Aegean, Gediz, Kuçuk Menderes, Buyuk Menderes, Western Mediterranean, Antalya, Sakarya, Western Black Sea, Yesilirmak, Kizilirmak, Konya Kapali, Eastern Mediterranean, Seyhan, Ceyhan, Eastern Black Sea, Burdur, Afyon, Orta, Anadolu, and Van. For Involuntary Resettlement Policy (OP 4.12), ILBANK will prepare a separate document (Land Acquisition and Resettlement Policy Framework - LARPF, etc.) before appraisal and that will also be shared with public. OP 4.12 compliance will be monitored via semiannual reports in order to closely follow project implementation consistency with the relevant safeguard documents (LARPF, etc.)

### Implementation Arrangements

Key actors in the implementation of this framework are the ILBANK Project Management Unit (PMU) and project proponent municipalities. ILBANK will continue to include the

Environmental Specialists to coordinate the implementation of the Environmental Framework. The Environmental Specialists will monitor subprojects and provide the necessary guidance on preparation of Category A and Category B EA documents in accordance with the WB requirements. Furthermore, the Environmental Specialists will supervise the municipality officials for WB safeguard requirements, consult the ESMP implementation and monitor the comments and concern mechanism of the affected groups. Municipalities have the capacity to properly implement environmental and social impacts assessment documents (for both Category A and B) during the construction and operational phases. Where such capacity is lacking, the municipalities will be assisted by Environmental Specialists to supervise the works carried out by the contractor and ensure that the environmental and social impacts assessment documents are followed adequately.

#### Grievance Mechanism

All municipalities adopted a service called *Beyaz Masa* ("White Table" in English) in Turkey to collect feedback from citizens. This municipal department was established to collect all the complaints and requests of the local residents and aims to provide possible solutions within the municipal structure for the requested concerns. Although the White Table system is not considered as a grievance mechanism, it is still acknowledged as a general complaint mechanism that the municipalities adopted within their structure. Therefore, the White Table system can be either proceeded as the actual or additional complaint mechanism for the selected projects since the selected projects are already within the municipality structure. The White Table system provides data management through the feedback of the citizens, however due to some organizational barriers (lack of specific departments and personnel); the system may disable itself to address the received concern/comments. Therefore, this system will be improved as mentioned above and will be tailored for the sub-project needs, as necessary. The SCP II aims to improve the current 'White Table' mechanism in the municipalities/utilities by identifying grievances/feedback related to the sub-investments under SCP-II. Any grievance related to a sub-investment financed under the SCP-II will be first logged at the municipality/utility level and will be addressed by the PIU satisfactorily within a certain period. If the complainant is not satisfied with the complaint resolution, then the case will be submitted to further levels. There will be a toll-free

number and online and SMS channels available for citizens to submit grievances through the 'White Table' system regarding the SCP-related grievances.

## **TURKEY**

### **THE SUSTAINABLE CITIES PROJECT-II**

#### **ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK**

##### **1. INTRODUCTION**

The Sustainable Cities Project (SCP) aims at supporting improved sustainability of Turkish Cities. The Sustainable Cities framework recognizes three dimensions of sustainability (environmental, economic/financial and social) most relevant for Turkish cities and also identifies spatial, environmental and financial planning instruments that are part of a comprehensive and integrated planning process that would move cities along a sustainability spectrum from Planned to Healthy, and finally to Smart Cities. SCP-II was designed as a Series of Projects operation and this Environmental and Social Management Framework (ESMF) is prepared for the second batch of sub-projects under SCP.

The Program Development Objective is to improve the planning capacity of and access to targeted municipal services in participating municipalities and utilities. The Program assist cities through: (a) planning for sustainable infrastructure service needs through more comprehensive and integrated municipal planning; (b) developing capital investment plans linked to urban plans in an effort to mobilize long-term financing that is essential in responding to investment priorities; and (c) financing infrastructure service requirements, particularly of the new Metropolitan Municipality Law of December 2012, to expand territorial service coverage.

The Municipalities and Water and Wastewater Utilities targeted for intervention in this second project in the Series of projects have received or are in the process of receiving assistance in planning for sustainable urban development and in developing a capital investment plan.

##### **2. OBJECTIVES OF THE SUSTAINABLE CITIES PROJECT-II**

The proposed program is designed as a series of projects (SOP). The SOP instrument is suitable as it will allow for the provision of financing to a single borrower (ILBANK) for sub-national lending to a gradual number of municipalities/utilities that are interested in a sustainable cities project approach to municipal development. It subsequently allows municipalities or a group of municipalities/utilities to access investment financing on a



phased-in and demand-driven basis and at a pace consistent with their readiness and ability to meet eligibility requirements. This is the second project of the SOP.

The first project in the SOP consisted of three Components.

Component A: Sustainable City Planning and Management Systems aims at supporting reforms including policies and legislation that improve sustainable urban development planning including technical assistance support (i) to municipalities/utilities for planning and management and for the preparation of feasibility studies, environmental assessments and engineering designs for municipal sub-projects; and (ii) to ILBANK for management of the grant and capacity building. Component B financed demand driven municipal investments and Component C financed Project Management.

Since the municipalities and utilities that will receive financing under this second project in the SOP have already benefited from Component A of SCP 1, this project will consist of two Components. These will include **Component A: Municipal Investments** and **Component B: Project Management**.

**Component A – Municipal Investments** (This component will finance demand driven municipal infrastructure investments. Sectors eligible for investment include but are not restricted to public transport, water and sanitation, solid waste management, and energy. In the water sector, it is anticipated that the sub-borrower will be the utility company, with a guarantee provided by the municipality. The component will finance goods, works and consultant services.

**Component B – Project Management** It will finance goods and consultancy services for project management, monitoring and evaluation, outreach and communication.

The SCP II (second in the series of project) will be very similar to SCP I in terms of nature of the sub-projects (investments). Therefore, the ESMF of SCP II is very similar to the ESMF prepared for SCP I. ILBANK disclosed SCP I's draft ESMF's executive summary on its website on August 25, 2014 and it was submitted to the WB Board on September 17, 2014. The final ESMF of SCP I has been disclosed on client's website on March 28, 2016 (Ilbank) and on the World Bank's Infoshop on March 29, 2016.

Investments carried out under the SCP-II will conform to the Republic of Turkey Environmental Regulation and the World Bank Safeguards Policies (as the lead financier). ILBANK will be the implementing agency of the project, acting as a financial intermediary, will on-lend the loan proceeds to municipalities or utilities. In this capacity, ILBANK will ensure that WB policies on environment are followed as described in this framework, in addition to the Turkish requirements ILBANK would be responsible to document that all Turkish environmental approvals, permits, licenses have been secured. The potential investment areas covered under the SCP II project is presented in Box 1.

As general policy, regardless of whether a project is financed through ILBANK's own sources or from the proceeds of a WB loan, ILBANK considers only those project

proposals that have fulfilled the requirements of the Turkish Regulation on Environmental Impact Assessment (EIA). In other words, all potential subprojects must have undergone an EIA screening according to Turkish Regulation and either have a positive opinion on the EIA or be assessed not to need an EIA before ILBANK starts reviewing them. Furthermore, no subproject loan may be approved until Turkish and World Bank environmental and social safeguard policy/regulatory requirements have been successfully completed.

**Box 1.** Potential Investment Fields for SCP-II

| <b>Field</b>                                    | <b>Objective/ Scope</b>   |
|---|---|
| <b>Water</b>                                    | Upgrading, rehabilitating and expanding of water supply systems to accompany urban growth and redevelopment.  |
| <b>Wastewater</b>                               | Expanding and rehabilitating collection networks, to ensure sewerage coverage in developing urban areas; investing in new wastewater treatment capacity, including for sludge management, in pursuit of environmental policy objectives.  |
| <b>Solid Waste</b>                              | Integrated solid waste management systems, including transfer, sorting, recycling, disposal (e.g. landfill development) and incineration (waste to energy).   |
| <b>Urban Transport</b>                          | Financing to support public transit systems (Bus Rapid Transit, zero-emission Trolley Buses, Cable Cars) parking facilities, transport system management improvements, pedestrianization (improved or expanded walking or bike paths and sidewalks), road construction and rehabilitation, etc. |
| <b>Energy Efficiency &amp; Renewable Energy</b> | Energy efficient systems in urban transport and municipal infrastructure systems; energy efficient buildings, solar fields, geothermal heating of buildings.  |

Ineligibility in terms of WB safeguards are another important factor for financing of the projects. Projects on International Waterways will trigger OP 7.50, and considered as ineligible. Additionally, projects which has impact on any Critical Natural Habitats are also defined as ineligible. Definition of Critical Natural Habitats under OP 4.04 covers i) legally protected; ii) officially proposed for protection; or iii) unprotected but of known high conservation value sites.

This document aims at minimizing the additional efforts necessary to meet WB environmental safeguards requirements. To this end, it identifies the key differences between the Turkish and WB requirements and defines steps that will fill the gaps.

### 3. ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

The World Bank's environmental and social safeguards policies require that the borrower country is expected prepare an Environmental and Social Management Framework (ESMF), integrated with the Regulation on Environmental Impact Assessment (henceforth "EIA Regulation") (Official Gazette No. 26936, October 10, 2013) and WB's Operational Policy for Environmental Assessment (OP 4.01) for the SCP-II. Since the sub-project locations under the SCP-II is not known at the time of appraisal, ESMF is the key document to be shared with stakeholders before implementation starts.

The ESMF forms a scope of the comprehensive environmental and social management approach that has been adopted for acknowledging the potential environmental and social impacts from the SCP-II. The ESMF seeks to consolidate and facilitate understanding of all necessary policy and regulatory features of the Turkish Government as well as the World Bank's environmental and social safeguards policies that are applicable to the project. Currently, the details (location, dimension and design) of the SCP-II are not defined yet, therefore, the detailed assessment of possible social and environmental impacts of the sub-projects are deferred to implementation stage. However, the ESMF will cover the entire related environmental and social framework from the previous SCP project and include the impacts of the new financing options as well.

The ESMF serves as an overall and systematic guide covering policies, procedures and provisions that are to be integrated with the overall project period to ensure that the social and environmental issues are systematically addressed at the sub-project stage. Furthermore, the ESMF provides technical inputs and guidance for the SCP-II from an environmental and social management perspective. Therefore, the application and implementation of the ESMF will guide the integration of social and environmental aspects into the decision-making process of all stages related to planning, design, execution, operation and maintenance of sub-projects, by identifying, preventing and /or minimizing adverse social and environmental impacts early – on in the project cycle.

## 4. TURKISH LEGISLATION

### The Turkish Regulation on EIA

The Regulation on Environmental Impact Assessment (henceforth “EIA Regulation”) (Official Gazette No. 26939, October 10, 2013) governs environmental impact assessment of investment projects in Turkey and is largely in line with the EU Directive on EIA. Below, the key relevant steps of Turkish EIA procedure namely screening, public consultation, scoping, disclosure and supervision are reviewed briefly in the order in which they are prescribed to occur:

#### **a) Screening:**

The EIA Regulation classifies projects into two categories:

- *Annex I projects.* These are projects that have significant potential impacts and *require* an EIA. Annex I of the EIA Regulation lists these projects types, so project proponents are expected to start the EIA procedure without any other screening process; and
- *Annex II projects.* Annex II of the EIA regulation covers the projects that may or may not have significant effects on the environment. Proponents of Annex II projects are required to submit a Project Information File (PIF) to the Ministry of Environment and Forestry (MoEU). The PIF is prepared following the General Format for PIF provided in Annex III of the EIA Regulation and contains information on (i) project characteristics and objective; (ii) selected and alternative project sites; (iii) environmental characteristics of the project site and impact area; (iv) significant impacts of the project and measures to be taken; and (v) plan for public participation. A non-technical summary of the above items is also to be added to the PIF. Based on the PIF and the Selection and Elimination Criteria specified in Annex IV of the EIA Regulation, MoEU determines whether an EIA is necessary.

**Hata! Başvuru kaynağı bulunamadı.** provides the list of project types that will be considered for funding under the present project and their category per the EIA Regulation. The social impacts within the screening are not compulsory in the national EIA regulation and generally are either very briefly mentioned or not.

**TABLE 1. PROJECT TYPES AND THEIR CATEGORIZATION (ACCORDING TO TURKISH EIA REGULATION)**

| Investment area           | Annex I   | Annex II  |
|---------------------------|---|---|
| Municipal solid waste     | <ul style="list-style-type: none"> <li>Except, demolishing and excavated soil disposal areas, Landfill, Recycling or Incineration facilities (thermal processes regarding burning with oxygen, pyrolysis, gasification etc.) land requirement <math>\geq 10</math> ha and/or receiving <math>\geq 100</math> tons / day, including in the target year.</li> </ul> | <ul style="list-style-type: none"> <li>Landfills of <math>&lt;10</math> ha or <math>&lt;100</math> tons / day, including in the target year</li> <li>Except, demolishing and excavated soil disposal areas, Recycling, Composting or Incineration facilities (thermal processes regarding burning with oxygen, pyrolysis, gasification etc.) receiving <math>&lt; 100</math> tons / day, including in the target year.</li> </ul> |
| Municipal wastewater      | WWTP for population of more than 150.000 and/or having 30.000 m <sup>3</sup> /day flow.   | <ul style="list-style-type: none"> <li>Deep sea discharge</li> <li>WWTP for population less than 150.000 and/or less 30.000 m<sup>3</sup>/day flow</li> </ul>   |
| Municipal water supply    | <ul style="list-style-type: none"> <li>Reservoirs of <math>\geq 10</math> million m<sup>3</sup></li> <li>Extraction of ground water of <math>\geq 10</math> million m<sup>3</sup>/year</li> </ul>   | <ul style="list-style-type: none"> <li>Reservoirs of <math>\geq 5</math> million m<sup>3</sup></li> <li>Extraction of ground water of <math>\geq 1</math> million m<sup>3</sup>/year</li> </ul>   |
| Urban transport           | N/A   | <ul style="list-style-type: none"> <li>Trams, rapid transit (metro, subways, undergrounds etc.</li> </ul>   |
| Sustainable Urban Energy* | N/A   | N/A   |

\*: Energy efficiency projects are not covered in Annex I or Annex II of the national EIA Regulation; and no EIA or PIF is required

Source: Republic of Turkey, Regulation on EIA (Official Gazette No. 28784, October 10, 2013)

#### **b) Public consultation meeting:**

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

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

#### **c) Scoping:**

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

#### **d) Review and approval of the EIA report:**

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

MoEU determines whether the “EIA is positive” in which case the project proponent may implement the project or “EIA is negative” in which case the project may not go any forward.

**e) Disclosure:**

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

**f) Monitoring and inspection:**

According to the EIA Regulation, MoEU monitors and inspects projects that were assessed either “not to need an EIA” or “to have a positive EIA” based on provisions specified in the PIF or the EIA, respectively. Furthermore, the project proponent is obliged to submit monitoring reports to MoEU, which transmits them to the Governorate for disclosure to the public (The form or medium of this disclosure is not specified in the EIA Regulation) In case MoEU determines non-compliance, the Governorate issues a warning. If after the granted time compliance is still not achieved the Governorate may suspend the operation of the plant in question.

## 5. THE WB ENVIRONMENTAL ASSESSMENT POLICY

### a) Project categories and screening

Under the WB's Operational Policy for Environmental Assessment (O.P. 4.01), projects are classified as Category A, B and C according to the level of their likely impact on the environment:

- *Category A.* A proposed project is classified as Category A if it is likely to have significant adverse environmental impacts (based on type, location, sensitivity, and scale of the project and the nature and magnitude of its potential environmental impacts). These impacts are generally large-scale, irreversible, sensitive, diverse, cumulative or precedent setting and may affect an area broader than the sites or facilities financed by the project. For example, Category A projects have one or more of the following attributes: large-scale conversion or degradation of natural habitats; extraction, consumption, or conversion of substantial amounts of forest, mineral and other natural resources; direct discharge of pollutants resulting in degradation of air, water or soil; production, storage, use or disposal of hazardous materials and wastes; measurable changes in hydrologic cycle; risks associated with the proposed use of pesticides. Indicative examples in the context of the present project include: Construction of a significant new wastewater treatment plant, a new landfill, and rehabilitation of existing landfill with significant environmental impact.
- *Category B.* A proposed project is classified as Category B if the potential impacts on the environment are typically site-specific, reversible in nature; less adverse than those of Category A subprojects and for which mitigatory measures can be designed more readily. Projects in Category B sometimes differ only in scale from Category A projects of the same type. For example, large irrigation and drainage projects are usually categorized as A; however, small-scale projects of the same type may be categorized as B. The same can be true for small-scale, relatively clean (gas or light diesel oil fired) thermal power plants, micro hydro power plants, and small sanitary landfills. Similarly, projects that finance rehabilitating or maintaining an existing infrastructure may have adverse impacts, but are likely to be less significant compared to a Category A project, and would be categorized as B. Indicative examples include: Rehabilitation or construction of water supply and/or sewerage network, water treatment plants, wastewater treatment plants which does not include an expansion or new construction, construction of small-scale water treatment plants, urban transport and energy efficiency. Although it has not been specified in the OP, Category B projects divides in two within its structure as Low B and High B projects in practice. Category High B projects have relatively more impacts and mitigation measures comparing to Category Low B projects, yet the impacts and mitigation measures are not significant enough to be recognized as Category A projects.

*Category C.* A proposed project is classified as Category C if it is likely to have minimal or no adverse environmental impacts. For example, technical assistance projects in institutional development, computerization and training fall in Category C.

When a WB-funded project involves a series of subprojects, which are selected and funded by a financial intermediary (FI) using WB loan proceeds, the project is classified as Category FI. In



such projects, the FI screens and classifies the proposed subprojects as Category A, B, or C following the above definitions and ensures that the borrower<sup>1</sup> carries out the corresponding environmental assessment. Since the present project is an FI project, the following discussion will refer to subprojects only.

There are no clear-cut border values distinguishing the categories or, unlike the Turkish EIA Regulation, any ready lists of project types for categorizing projects as A, B and C; rather projects are screened on a case by case basis. Although the categorization of projects are based on the magnitude of environmental impacts, projects with high level social risks may also be determinative in categorizing a project.

#### **b) Scope of environmental assessment.**

The scope and type of the environmental assessment (EA)<sup>2</sup> varies between Category A and B subprojects.

For Category A sub-projects the borrower is required to prepare an EIA which examines the subproject's potential negative and positive environmental impacts as well as its social impacts, compares them with those of feasible alternatives (including the "without project" situation), and recommends any measures needed to prevent, minimize, mitigate, or compensate for adverse impacts and improve environmental and social performance (see Annex 1A for a suggested format). Analysis of alternatives is a particularly important feature of an EIA. ESIA also includes an Environmental and Social Management Plan (ESMP) which details the measures to be taken during the implementation and operation of a (sub) project to eliminate, reduce or offset adverse environmental and social impacts, the actions needed to implement these measures as well as monitoring indicators and actions and responsibilities (see Annex 1B for an ESMP format). (Annexes 2).The sample tables provide a list of possible environmental and social impacts that may be encountered in subprojects and defines mitigation measures for each of the impacts presented. A subproject may not be limited to or subject to all of the impact categories defined under this table, thus each subproject will need to prepare a customized ESMP regarding its impacts.

The scope of EA for a Category B subproject may vary from subproject to subproject, but is narrower than the ESIA required for Category A. Like Category A ESIA, it examines the subproject's potential negative and positive environmental and social impacts and recommends any measures needed to prevent, minimize, mitigate, or compensate for adverse impacts and improve environmental performance. If the project is recognized as B category, this information may be contained in an ESMP only unless there are site-specific issues which necessitating a site-specific assessment in addition to the ESMP. An example is modest scale building construction on a site in an urban area which would normally require only an ESMP if it is known that there are no environmental and social issues relating to the site. If it is construction on a greenfield site, a

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<sup>1</sup>"Borrower" refers to borrowing project proponent in FI projects. In the context of the present project, the borrowers are municipalities.

<sup>2</sup> "Environmental assessment" is used as a general term here.

simple EA would be needed to clarify whether there are any special environmental or social issues. The project could turn into Category A if EA work shows likelihood of significant damage to natural habitat or cases where significant amount of land take is required. On the other hand, if the project is recognized as High B, then partial EA document or partial ESIA is required to satisfy the expected requirements.

### **c) Public consultation**

For all Category A and B subprojects proposed for WB financing, during the EA process, the borrower consults subproject-affected groups and NGOs about the subproject's environmental aspects and takes their views into account. The borrower initiates such consultations as early as possible. For Category A projects, consultations with these groups occur at least twice: a) shortly after environmental screening and before the terms of reference for the ESIA are finalized; and (b) once a draft ESIA report is prepared. The borrower provides for the initial consultation a summary of the proposed subproject's objectives, description, and potential impacts related to both environmental and social issues. For consultation after the draft ESIA report is prepared, the borrower provides a summary of the ESIA's conclusions. For category B subprojects, at least one consultation is held with affected groups and local NGOs: once the draft EA report (including ESMP) is prepared. The borrower provides a summary of the EA's conclusions. (Please also refer to "g) Disclosure").

In addition, the borrower consults with such groups throughout project implementation as necessary to address EA-related issues that affect them.

For meaningful consultations between the borrower and project-affected groups and local NGOs on all Category A and B subprojects proposed for WB financing, the borrower provides relevant material (in local language) in a timely manner prior to consultation and in a form and language that are understandable and accessible to the groups being consulted.

### **d) Review and approval of the EA**

In FI projects, the responsibility to ensure that OP 4.01 requirements are met rests with the FI. The EA process should normally be completed prior to the FI's approval of a subproject for financing with a WB loan.

### **e) Conditionality**

In FI projects, the sub-loan agreement between ILBANK and the borrower must include the conditionality for the borrower to implement the ESMP for Category A and B subprojects. The borrower must monitor and ensure that the contractor is in compliance with the provisions of the ESMP. In order to fulfill its environmental and social obligation, the borrower may incorporate provisions of the ESMP into the procurement documents and contracts for works. Non-compliance may lead to the suspension of WB funding for the subproject.

### **f) Disclosure**

In addition to the disclosure requirements specified under "c) Public consultation" above, for Category A subprojects, the FI/municipality must make the draft EIA report in local language publicly available to subproject-affected groups and local NGOs; prior to the meeting.

When the ESIA of a Category A subproject is finalized, the FI transmits to WB an English language copy of the final report including an English language executive summary. The Bank distributes the executive summary to its executive directors and makes the report available through its external website.

In case of Category B subprojects, the FI transmits to WB the final English language Category B EA report and WB makes it available through its external website.

#### **g) Implementation**

During subproject implementation, the FI reports to WB on (a) compliance with measures agreed with the Bank on the basis of the findings and results of the EA and additional social assessment (if any), including implementation of the ESMP; and (b) the findings of monitoring programs. The Bank bases supervision of the project's environmental and social aspects on the findings and recommendations of the EA and social assessment, including measures set out in the legal agreements, any ESMP, and other project documents.

## **6. KEY DIFFERENCES BETWEEN THE TURKISH EIA REGULATION AND WB OP 4.01 POLICY**

The Turkish EIA procedures are, with some exceptions, in line with the World Bank's EA policies. The primary exceptions are in project categorization, content of EA and public consultation.

### **a) Project categorization.**

Some subprojects covered by Turkish Annex II fall within the WB Category A. For example, where a significant new wastewater treatment plant (WWTP) is proposed for financing which, as a Category A project for the WB requires an ESIA, but under the Turkish EIA Regulation is identified as Annex II requiring a PIF, which after review and decision by MoEU may or may not require an EIA. Some subprojects that are not listed in either Annex I or Annex II of the Turkish EIA Regulation, such as a new WWTP servicing a population of less than 150,000 may under the WB policy be classified as Category B or even Category A project.

### **b) EA content**

*Category A subprojects.* A broad comparison of the outline required by WB for a Category A subproject EIA with the general format of a Turkish EIA indicates a number of differences as presented in Table 3. These include notably the absence of an executive summary and information on the policy, legal and administrative framework, as well as possible discrepancies with regard to the level at which the subproject's environmental and social impacts, its alternatives, and mitigation measures for the impacts are discussed. A key gap is the absence of an ESMP with clear specification of actions and delineation of responsibilities. Nevertheless, the project specific format for EIA may require more details under some of these headings than indicated in the general format for PIF. Consequently, a case by case review of the Turkish EIAs is necessary to identify gaps with WB requirements.

*Category B subprojects.* The content of the EA required by WB depends on the special circumstances of the project. In all cases, an ESMP is required which is only partially covered in a Turkish EIA. The WB also requires partial EA or partial ESIA for Category High B projects, on the other hand, Turkish EIA does not cover in between categorization as Category High B, nor requires any other project documents in this regard.

### **c) Public consultation**

The "pre-scoping" consultation which is required by Turkish EIA Regulation for subprojects requiring an EIA is largely equivalent to the first consultation required by WB for Category A subprojects. However, WB requires a consultation on draft EA for both Category A and Category B subprojects; there is no equivalent provision in the Turkish EIA Regulation.

**d) Disclosure.** The Turkish EIA Regulation only requires announcement of the evaluation result together with the justification. On the other hand, WB has different consultation requirements for Category A and Category B projects. In line with the WB policies Category A projects require two (2) public consultations, one at the scoping stage (where typically the public will have the opportunity to comment on the TORs for the ESIA) and the second at the draft EA stage. For the Category B projects, in line with the OP 4.01, the draft EA should be made available to local NGOs

and project affected groups. For Category B subprojects the final ESMP report must be published on WB's website. For Category A sub-projects WB requires that the final ESIA report be made available to the public locally in addition to being published on WB's external website and submitted to the WB Board.

**TABLE 2. COMPARISON OF TURKISH AND WB CATEGORIES FOR INVESTMENT TYPES COVERED UNDER THE PRESENT PROJECT**

|                        | Turkish Category  |   | WB Category        | Comments  |
|------------------------|---|---|--------------------|---|
|                        | Annex I   | Annex II  |                    |   |
| Municipal Solid Waste  | <ul style="list-style-type: none"> <li>Except, demolishing and excavated soil disposal areas, Landfill, Recycling or Incineration facilities (thermal processes regarding burning with oxygen, pyrolysis, gasification etc.) land requirement <math>\geq 10</math> ha and/or receiving <math>\geq 100</math> tons / day, including in the target year.</li> </ul> |   | A                  | If there is a reason to believe that there is likely significant impacts on nature, community health and safety, livelihoods through significant involuntary land acquisition, or air or water quality, project can be classified as Category A, Category High B or Category Low B. Whether the existing impact is examined through initial reconnaissance.   |
|                        |   | <ul style="list-style-type: none"> <li>Landfills of <math>&lt;10</math> ha or <math>&lt;100</math> tons / day, including in the target year</li> <li>Except, demolishing and excavated soil disposal areas, Recycling, Composting or Incineration facilities (thermal processes regarding burning with oxygen, pyrolysis, gasification etc.) receiving <math>&lt; 100</math> tons / day, including in the target year.</li> </ul> | Low B              | Unless there is reason to believe that there is likely to have significant impacts on nature, community health and safety, livelihoods through any involuntary land acquisition, or air or water quality beyond the landfill site. Whether the impact exists is examined through initial reconnaissance.  |
| Municipal Wastewater   |   | <ul style="list-style-type: none"> <li>Deep sea discharge</li> </ul>  | A                  | Could be B only if the discharge is very small and if demonstrated that there is no possibility that the discharge will include hazardous materials.  |
|                        | <ul style="list-style-type: none"> <li>WWTP with capacity of <math>\geq 150,000</math> person equivalent and/or <math>\geq 30,000</math> m<sup>3</sup>/day</li> </ul>   |   | A/High B/<br>Low B | If there is reason to believe that there is likely to have significant impacts on nature, community health and safety, livelihoods through significant involuntary land acquisition or air or water quality beyond the WWTP, WWTP project with a capacity less than 150,000 person equivalent and/or $<30,000$ m <sup>3</sup> /day can be classified as Category High B or B. Whether the existing impact is examined through initial reconnaissance. |
| Municipal Water Supply | <ul style="list-style-type: none"> <li>Reservoirs of <math>\geq 10</math> million m<sup>3</sup></li> </ul>  | <ul style="list-style-type: none"> <li>Reservoirs of <math>\geq 5</math> million m<sup>3</sup></li> </ul>   | A/High B/<br>Low B | If there is a reason to believe that there is likely significant impacts on nature, community health and safety, livelihoods through significant involuntary land acquisition or air or water quality beyond the reservoir site, project can be classified Category A, Category High B or Category Low B. Whether the existing impact is examined through initial reconnaissance.   |
|                        | <ul style="list-style-type: none"> <li>Extraction of ground water of <math>\geq 10</math> million m<sup>3</sup>/year</li> </ul>   | <ul style="list-style-type: none"> <li>Extraction of ground water of <math>\geq 1</math> million m<sup>3</sup>/year</li> </ul>  | A/High B/<br>Low B | If there is a reason to believe that there is likely significant impacts on nature, community health and safety, livelihoods through significant involuntary land acquisition or air or water quality beyond the extraction site, project can be classified as Category A, Category High B or Category Low B. Whether the existing impact is examined through initial reconnaissance.   |
| Urban Transport        |   | <ul style="list-style-type: none"> <li>Trams, rapid transit (metro/ subways/underground etc.)</li> </ul>  | Low B              | Unless there is reason to believe that there is likely to have significant impacts on nature, community health and safety, livelihoods through significant involuntary land acquisition or air or water quality beyond the landfill site. Whether the   |

|                   |   |   |       |   |
|-------------------|---|---|-------|---|
|                   |   |   |       | impact exists is examined through initial reconnaissance.   |
| City Planning     | <ul style="list-style-type: none"> <li>Housing projects &gt;2.000 residences</li> <li>&gt;500 Bed capacity hospitals</li> <li>&gt;50ha Golf facilities</li> <li>&gt;50.000m2 Shopping centers</li> </ul> >500 Room touristic residence facilities | <ul style="list-style-type: none"> <li>Housing Projects &gt;200 residences</li> <li>&gt;50.000m2 Education Campuses</li> <li>&gt; 50 – 500 Bed capacity hospitals</li> <li>&gt;50.000 m2 camp and motorhome areas</li> <li>&gt;50.000 m2 theme parks</li> <li>&gt;1000m2 Ski resorts</li> <li>&lt;50.000m2 Golf facilities</li> </ul> Between 10.000 – 50.000 m2 Shopping Centers | Low B | Unless there is reason to believe that there is likely to have significant impacts on nature, community health and safety, livelihoods through significant involuntary land acquisition or air or water quality beyond the landfill site. Whether existing impact is examined through initial reconnaissance. |
| Energy Efficiency | <ul style="list-style-type: none"> <li>Will be based on improvement of heat and light systems, not subjected to EIA.</li> <li>Renewable energy projects (solar &gt; 20 ha, geothermal &gt;25 MWt , wind &gt; 20 turbines)</li> </ul>              | <ul style="list-style-type: none"> <li>Will be based on improvement of heat and light systems, not subjected to EIA.</li> </ul>   | Low B | Unless there is reason to believe that there is likely significant impacts on nature, community health and safety, livelihoods through significant involuntary land acquisition or air or water quality beyond the landfill site. Whether existing impact is examined through initial reconnaissance.         |

**TABLE 3. COMPARISON OF REQUIRED ESIA REPORT CONTENTS**

| <b>WB Category A project ESIA requirements</b> | <b>Covered by the Turkish EIA?</b>   |
|--|--|
| Executive Summary                              | No. (Technical level of information in the non-technical summary required in the Turkish EIA may not meet WB requirements).  |
| Policy, legal and administrative framework     | No.  |
| Project description                            | Largely yes, but may not include supporting infrastructure that may be required.   |
| Baseline data                                  | Yes, but it might not include all baseline data or level of detail that WB may require. There are no provisions for the collection of social baseline data.  |
| Environmental impacts                          | Yes, but no requirements to discuss residual impacts that cannot be mitigated or to explore opportunities for environmental enhancement. Also no requirement to identify and estimate the extent and quality of data, key data gaps, and uncertainties associated with predictions, or to specify projects that require further attention. Additionally, assessment of cumulative impacts including indirect and induced impacts are not discussed in detailed. Specially, no requirement to cover cumulative impacts with other projects (past, existing and future) in project influence area. |
| Analysis of alternatives                       | Yes. General format for PIF requires that the main alternatives be discussed in summary and the reasons for selecting the proposed site, but does not provide any other specific instructions. The level of detail and depth in the discussion of alternatives in the EIA is determined by the EIA commission appointed by MoEU.   |
| Environmental and Social Management Plan       | No. PIF/EIA requires presentation of planned mitigation measures, but not the cost, timing and institutional responsibilities or monitoring arrangements. There are no provisions for the monitoring of social impacts as by national laws collection of social baseline data and assessment of social impacts is not compulsory. Therefore, Turkish EIA is not adequate about monitoring arrangements provided in the EIAs.   |
| Social Baseline and Impact Assessment          | Partially yes, but the social baselines prepared for the EIAs do not oblige primary data collection at project affected communities and regular stakeholder meetings with all stakeholders. The required social baseline for the Turkish EIA can be prepared by desktop studies aiming to collect secondary data and an impact assessment is not required for the EIAs.  |
| Stakeholder Engagement                         | Partially yes, but it is not required to make regular project information disclosure. An official “Public Participation Meeting” organized by the Ministry is the only obligatory stakeholder meeting and more meetings are not required.  |



**TABLE 4. COMPARISON OF DISCLOSURE REQUIREMENTS**

| Timing                     | WB requirements   |  | Turkish requirement*   |
|----------------------------|---|--|--|
|                            | Category A  | Category B   |  |
| Shortly after screening    | <ul style="list-style-type: none"> <li>During the first consultation, the borrower will provide summary of the objectives, description, and potential impacts of the subproject to the participants; in order to give them opportunity to make comments and give feedback about the Project. meeting</li> </ul>   |  | Participants are informed on the project. (EIA Regulation does not specify content of information to be provided.) |
| When draft EA is ready     | <ul style="list-style-type: none"> <li>Borrower will provide the ESIA conclusions to the participants. Borrower will make the draft ESIA publicly available and make it accessible to the project affected groups and the NGOs.</li> </ul>  | Borrower provides to participants of public consultation meeting summary of EA conclusions and ESMP.   | Central MoEU or provincial directorate makes draft EIA report available to public for comments.                    |
| When EA has been finalized | <ul style="list-style-type: none"> <li>Borrower makes final ESIA report available at a public place accessible to project-affected groups and local NGOs.</li> <li>Borrower sends final English language ESIA report to WB and WB makes it publicly available (by publishing on Bank's external website).</li> <li>Borrower sends English-language executive summary of final ESIA report to WB for submission to WB Board of Executive Directors.</li> </ul> | Borrower sends final English and Turkish language EA report to WB and WB makes it publicly available (by publishing on Bank's external website). | Governorate informs public on the result of MoEU's evaluation of the EIA report and justification                  |

\* For projects that are subject to EIA.

## 7. APPLICATION OF THE TURKISH EIA REGULATION AND WB EA POLICY

The World Bank has a Policies and Procedures Framework which provides a structure for developing and managing policy, procedure, directives and guidance type documents aiming to;

- organize documents in a more efficient and user-friendly manner;
- clarify responsibility for sponsoring, approving and managing them;
- improve communications to staff about revisions and new P&P Documents; and
- provide easy access by placing all documents in a single, fully searchable repository

Within the scope of this Project the operational policies listed below will be considered and details regarding these policies are presented in BOX 2.

Under the World Bank Environmental Assessment system (OP. 4.01), projects are classified as Category A, Category B or Category C depending upon estimated potential environmental risk. Unlike the WB categorization system, Turkish EIA regulation (same as EU EIA Directives) indicates threshold based project descriptions through Annexes. One of the main differences between two environmental processes (WB EA and Turkish EIA policies) can be seen in screening system of the projects. The differences between the Turkish EIA procedure and WB's Operational Policy for Environmental Assessment (OP. 4.01) can be seen in Table 2, 3 and 4.

Since the screening systems differ when compared to national EIA regulation, it is not technically very easy to cross-match the project screening among national and WB system. For example, it cannot be assumed that Annex I under the national system equates directly with World Bank Category A or Annex II with Category B. The differences in the two systems may arise, and it is possible for some Annex I projects to be considered Category B, or conversely, some Annex II projects to be considered Category A if for example they are planned in sensitive areas. Likewise, some No Annex projects may be screened as Category B especially if they could lead to modest negative impacts to the human or natural environment and the impacts confined to a small region and are temporary or short-lived and these impacts are easy and inexpensive to control (e.g. most of the construction activities).

In order to avoid repeating the same steps for both procedures, the Project will be carried out to meet the WB OP 4.01 requirements that are not contained in the Turkish EIA or PIF, but are required by the WB will be prepared in the form of "supplementary documents" (which can also include social assessment) to the Turkish EIA.

Required documentation for ESIA/EA process presented in this ESMF can vary project to project depending on project characteristics. In that respect, ILBANK will ensure that the ESIA's, partial ESIA's, ESMPs and documents presented to WB and publicly disclosed are prepared specific to proposed project.

## Step-By-Step Process of Meeting WB Requirements

### **Step 1: Screening**

ILBANK, in consultation with WB, will carry out the screening of subprojects. This process will cover an ineligibility assessment and environmental&social categorization of a subproject in line with OP 4.01. With regard to OP 7.50, ILBANK is responsible for ensuring that the projects financed are located/depending on national waterways only. The waterways identified as NOT an international waterway (do not trigger OP 7.50) in Turkey. These waterways are namely Susurluk, North Aegean, Gediz, Kuçuk Menderes, Buyuk Menderes, Western Mediterranean, Antalya, Sakarya, Western Black Sea, Yesilirmak, Kizilirmak, Konya Kapali, Eastern Mediterranean, Seyhan, Ceyhan, Eastern Black Sea, Burdur, Afyon, Orta Anadolu, and Van. See Box 2 for further information.

Outcomes of the Turkish EIA Process is another source to identify the impact significance of the project as well as to identify the sensitivity level of Project Area of the Influence (e.g. presence of natural habitats, projected areas etc.). In this process, ILBANK may ask consultants preparing the subproject feasibility reports to carry out an initial assessment of these risks to reach more informed decisions.

ILBANK will also guide the municipality regarding the environmental and social assessment document to be provided (as detailed in Chapter 5 of this document).

### **BOX 2: COMPLIANCE WITH OTHER WB OPERATIONAL POLICIES**

**Natural Habitats (OP 4.04).** There is some possibility that construction activities under the project may affect critical or non-critical natural habitats (as per World Bank definition in OP 4.04). Subprojects that have a significant impact on a recognized critical habitat or eco-system will be identified as ineligible under OP 4.01 and the key issue in the EIA will be the identification of alternatives to the subproject in terms of site and scope. If the subproject's likely impact on natural habitats is not significant or the impact is not on critical habitats then the first priority is to solve the situation through re-siting, if that is not possible, then the appropriate mitigation measures will be acknowledged for the related circumstance.

**Physical Cultural Resources (OP 4.11).** As the initial stage of baseline studies, literature and surficial studies are performed. Depending on these studies, potential impact on these sources and related mitigation measures are assessing in EA/ESIA. However, due to the nature of physical cultural resources, buried assets (i.e. graves or mounds) may not be determined during baseline studies. The principal issue is twofold: (i) "chance finds" identification of during construction, and (ii) potential impact of the project on known cultural values. Turkish laws, notably Law No. 2863 dated 21.07.1983 on the Protection of Cultural and Natural Assets (revised through the amendment issued on 27.07.2004 dated Official Gazette) and practices meet the World Bank requirements. The Regulation on Researches, Drillings and Excavations in Relation to the Cultural and Natural Assets, which was published in the Official Gazette No. 18485 dated 10.08.1994 define the procedures and obligations concerning the cultural and natural assets found out during construction. The municipalities are responsible for the application of the said law and regulation. As part

of the regular reporting, the municipalities will inform ILBANK of the historical and cultural findings, if any, as well as the actions taken. Ilbank is responsible to avoid or mitigate impacts on physical or cultural resources of the financed projects. Therefore, ILBANK will not proceed with subproject funding until all requirements of the Turkish legislation are met.

***International Waterways (OP 7.50).*** ILBANK is responsible for ensuring that the projects financed are located/depending on national waterways only. The waterways identified as NOT an international waterway (do not trigger OP 7.50) in Turkey are as follows: Susurluk, North Aegean, Gediz, Kuçuk Menderes, Buyuk Menderes, Western Mediterranean, Antalya, Sakarya, Western Black Sea, Yesilirmak, Kizilirmak, Konya Kapali, Eastern Mediterranean, Seyhan, Ceyhan, Eastern Black Sea, Burdur, Afyon, Orta Anadolu, and Van.

***Involuntary Resettlement (OP 4.12).*** A Land Acquisition and Resettlement Policy Framework (LARPF), which meets the requirements of this OP, has been prepared and will be utilized. LARF calls for the preparation of sub-project specific Resettlement Action Plans, when required.

***Safety of Dams (OP 4.37).*** Any sub-project which results in triggering of the policy will not be eligible for financing under SCP.

***Other World Bank Safeguards.*** No other safeguard policies are expected to be triggered but ILBANK will alert WB if questions arise.

**ILBANK** will submit to WB for clearance the proposed screening categories for the first 5 subprojects. The information submitted to the WB for this purpose will include the proposed screening category and the key environmental and social issues to be analyzed together with information substantiating the category selection. If after 5 subprojects WB feels comfortable with ILBANK's categorization, it will only carry out spot checks.

In cases where several separate investments (components) constitute a subproject, the highest category among the components will apply to the subproject. For instance, a subproject may include a wastewater treatment investment (Category A) and water distribution network rehabilitation (Category B). In this case, the subproject is classified as Category A. Ideally, the EA carried out in a subproject should combine all the components to be implemented under the subproject since this will generate a comprehensive overview on the environmental impact. However, the EAs of the activities may be prepared separately and works may commence at separate times as long as the components are independent of each other in terms of impact on the environment. When in doubt, ILBANK will consult with the WB Environmental and Social Specialist assigned to the project.

### ***Step 2: Environmental Assessment***

The type and content of the environmental assessment that fulfill WB OP 4.01 will depend on the category and special issues associated with the project as discussed above. A large part of the information and analysis is likely already available in the EIA or PIF document if the proposed subproject is classified as either an Annex I or and Annex II project according to the Turkish EIA Regulation. Then, according to the category of the sub-project the Turkish PIFs and EIAs will be used to prepare an ESIA (for Cat As), partial ESIA (for Cat high Bs) and ESMPs (for Cat low Bs). Completing a satisfactory ESMP/EA is the municipalities' responsibility. They may fund the cost of the ESMP either from the municipality's own resources or from the subproject loan.

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

### ***Step 3: Public Consultation***

#### ***Category A Subprojects***

In the case of Category A projects, the number and content of public consultations will depend on whether a Turkish EIA was carried out and the compatibility of the Turkish EIA report with WB requirements. If a Turkish EIA was not carried out, at least two public consultation meetings will be carried out, namely one to discuss the TOR and a second one to discuss the draft ESIA report.

In cases where the Turkish EIA has major information gaps relative to WB requirements (see discussion under "Step 2: Environmental Assessment"), also at least two public consultation meetings will be held. The first meeting will be on the EIA TORs for the proposed supplementary documents. The second meeting will be held when the supplementary EA documents are in draft form; at this meeting both the draft supplementary documents and the Turkish EIA will be discussed. In contrast, in cases, where the information gap between the Turkish EIA and the WB requirements is minor (also see discussion under "Step 2: Environmental Assessment"), a public consultation meeting will be carried out when the draft supplementary documents are available and discuss the entire WB ESIA package.

### ***Category B Subprojects***

A public consultation meeting will be held for Category B subprojects at the draft EA stage whether or not PIF is available. This is because the Turkish EIA Regulation does not require public consultation for projects that are not subject to EIA whereas WB policy requires at least one consultation meeting.

Public consultations will be widely announced at least two weeks using local newspapers and other local means of information dissemination that are known to be effective. For both Category A and B projects, the municipality will ensure that draft EIAs and ESMPs and other assessment or supplementary documents are available in public places and meeting announcement will point out the location. The minutes of public meetings will be recorded and included in the draft and final EIAs for Category A subprojects, final WB EA documents (ESMP and assessment of local environmental issue where applicable) for Category B subprojects. Annex 4 provides a table of contents for the public consultation documentation.

#### **Step 4: World Bank Clearance**

The World Bank will provide prior review and approval to all projects required by Turkish regulation to prepare an EIA and/or assigned "Category A" in accordance with WB procedures before a final decision to fund the subproject can be taken by ILBANK. Category B subprojects will also be subject to prior review and approval of the Bank. In case of Category B subprojects, ILBANK can review and clear the EAs and/or ESMPs after approving to fund the subproject but before any physical construction has started and/or any commitments to purchase equipment have been made. This of course creates the risk for the project proponent that the detailed designs and tender documents may have to be revised at their expense. Regardless of the timing of their finalization, the World Bank will review the first 3 Category B subproject ESMPs. If after review of the first 3 Category B subprojects the World Bank is satisfied that procedures described in this Framework are being implemented by ILBANK in a satisfactory manner the World Bank will not engage in detailed reviews of Category B subprojects. However, the World Bank will conduct post-review of selected EA/ESMPs.

#### **Step 5: Incorporation in Works Contracts**

Sub-loan agreement must include requirement to implement the ESMP. For both Category A and Category B projects, the ESMP will also be attached to the procurement documents and be part of the contract with the contractor selected to carry out the subproject works. These sections include potential impacts that may occur during the set of works in question and measures that the contractor needs to take to mitigate them.

#### **Step 6: Information Disclosure**

For both Category A and B projects, the municipality will ensure that hard copies of the final Turkish language WB ESIA and ESMPs are available in public place<sup>3</sup>. ILBANK will post the final documents on its website. In case of Category A subprojects and the first three Category B subprojects disclosure in Turkey must be complete before WB can provide the 'no objection' to its financing. In addition, the final ESIA report for Category A projects should be disclosed to public during the second public participation meeting.

Prior to subproject approval, ILBANK will also submit English versions of the final WB ESIA and ESMP documents to the World Bank for posting on InfoShop. In case of Category A subprojects, 30 days prior to subproject approval, ILBANK will submit the English language executive summary of the ESIA reports to WB Board. And the full ESIA reports will also be submitted to WB's Board during project implementation.

#### **Step 8: Monitoring**

ILBANK will carry out regular supervision of subprojects during construction and operation to ensure that the ESIA or ESMP is being duly carried out. When ILBANK notices any problems in ESIA or ESMP implementation it will inform the relevant municipality and agree with them on steps to rectify these problems. ILBANK will report its findings to the WB in its biannual project progress report or more frequently, as needed to bring issues to the attention of the World Bank. The WB project team will on occasion, and as required, also visit project sites as part of project supervision.

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<sup>3</sup> "WB ESIA and ESMPs" means original Turkish EIA and gap-filling supplementary documents.

## 8. REPORTING TO THE WORLD BANK

In its biannual project status reports, ILBANK will include a section titled “Environmental and Social Safeguards” which will summarize the status of ESMP implementation based on its monitoring activities. The report will highlight any issues arising from non-compliance and how it has been/is being addressed and from the triggering of OPs 4.04, 4.11 or 7.50 in environmental means and OP 4.01 and 4.12 in social means.

ILBANK will also maintain an EA status table titled “Environmental and Social Assessment Status of Project Components by Municipality”. The table will include information on the WB EA category, review of the EA TOR by ILBANK, consultant hiring, public consultation meetings, status (drafting, revision and finalization) of the EA report. ILBANK will share this document with the WB upon request.

## 9. INSTITUTIONAL ARRANGEMENTS

Key actors in the implementation of this framework are the ILBANK Project Management Unit (PMU) and project proponent municipalities. In the following the overall roles and capacities of these actors are discussed. The summary of roles and responsibilities is listed in Table 5.

### ILBANK PMU

ILBANK PMU will continue to include an environmental specialist to coordinate the implementation of the Environmental and Social Management Framework. The Environmental Specialist’s responsibilities will be as follows:

- Carry out screening of the subprojects with regard to EA categorization according to WB requirements.
- Provide municipality EA consultants guidance on preparation of Category A and Category B EA documents in accordance with WB requirements
- Provide municipality officials/municipality EA consultants with guidance on World Bank EA procedures, notably consultation and disclosure requirements for Category A and Category B projects
- Provide municipality officials/municipality EA consultants with guidance on WB safeguard requirements (documentation and procedures) for cultural properties, natural habitats, forests, and international waterways
- Review EA documentation, provide written comments to municipality EA consultants, ultimately provide formal approval of EA documentation and procedures in accordance with WB safeguard requirements
- Ensure that sub-loan documentation includes agreements to implement the ESMP and any other environment or social safeguard requirements;
- Perform supervision of ESMP implementation by the municipality and document performance, recommendations and any further actions required as part of overall project supervision reporting to the WB;
- Be open to comments from affected groups and local environmental authorities regarding environmental aspects of subproject implementation. Meet with these groups during site visits, as necessary;
- Coordinate and liaise with WB supervision missions regarding environmental safeguard aspects of subproject implementation



## Municipalities

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

The municipalities generally have the capacity to properly implement ESMPs (for both Category A and B) during the construction and operational phases. Where such capacity is lacking<sup>4</sup>, the municipalities will retain environmental specialist consultants to assist them in supervising the works carried out by the contractor and ensuring that the ESMP is followed adequately. Furthermore, the project may provide institutional strengthening to municipalities through additional training or acquisition of equipment, as needed.

**TABLE 5. ROLES AND RESPONSIBILITIES**

|                            | <b>Municipalities</b>  | <b>ILBANK</b>  | <b>World Bank</b>   |
|----------------------------|--|--|---|
| <b>Financial Roles</b>     | Requestor  | Financial intermediary   | Main finance source   |
| <b>Application Process</b> | Submit Demand Based Applications   | Review / Analyze the applications in order to provide information to World Bank  | Concur the final selection of eight participating municipalities.   |
| <b>Preparation Process</b> | Welcome and apply the relevant laws and regulations that are introduced by World Bank through ILBANK | Coordinate the selected municipalities to ensure all the relevant rules and regulations will be adopted throughout the project<br><br>Organize internal working structure for the investment options | Assist ILBANK in Developing Performance and Monitoring Database system during the preparation phase<br><br>Provide technical guide for ILBANK |
| <b>Number of Staff</b>     | One Social and One Environmental Expert  | In addition to present team, a support team can be established. Structure of the team and qualification of team members will be defined by ILBANK and WB. Individual freelance consultants           | Assist ILBANK in establishing monitoring team.  |

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<sup>4</sup> The capacity of the participating municipalities will be done by the PIU (ILBANK) in close collaboration with WB.

|                      |   |   |  |
|----------------------|---|---|--|
|                      |   | can be employed.  |  |
| <b>Project Roles</b> | Preparation of ESIA, ESMP and Grievance Mechanism       | The main responsible for monitoring ESIA, ESMP and Grievance process  | Overall review of the project development stages                     |
|                      | Tendering all the project works and consulting services | Supervise and monitor the whole process to ensure the proper application of the World Bank's environmental and social safeguard policies are applied. | Review of incoming reports to see the Bank standards are in progress |

## 10. ENVIRONMENTAL AND SOCIAL MONITORING AND GRIEVANCE MECHANISM

### Environmental and Social Monitoring

The environmental and social issues included within the mitigation measures are monitored and supervised by the appointed specialists through ILBANK. Although the environmental and social impacts are expected to be quite low, the potential negative environmental impacts are planned to be prevented or mitigated during the construction and operation stages.

The Environmental Monitoring System will cover the following,

- General Environment
- Air Emissions
- Soil
- Surface water and groundwater
- Biodiversity
- Noise and dust emissions

In addition to the above mentioned detailed environmental monitoring, Ilker Bank will also be responsible to conduct social monitoring during the life of the Project. The social monitoring of each subproject will consist of the following issues:

- Community Health and Safety
- Employment
- Labor Influx (not all subjects may have labor influx issues. Labor influx pertains to social risks that might be encountered from long term accommodation of workers on camp sites established on site for the construction of investments.)
- Local Procurement
- Land Acquisition
- Impacted Vulnerable Groups (such as waste pickers, people with disabilities, elderly etc.)

Environmental and social monitoring system starts from the implementation phase of the project through the operation phase in order to prevent negative impacts of the project and observe the effectiveness of mitigation measures. This system enables the WB and the borrower to evaluate the success of mitigation as part of project supervision, and allows to take an action when needed.

The monitoring system provides,

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

### **Grievance Mechanism**

The Grievance Mechanism is a process that enables any stakeholder to make a complaint or a suggestion about the way a project is being planned, constructed or implemented. The municipality will establish a transparent and comprehensive Grievance Mechanism before the implementation of the project in order to receive and resolve the affected communities concerns, queries, complaints and grievances about the environmental and social aspects of the project.

Some different forms public announcement tools to be used for the establishment of the Grievance Mechanism includes;

- Distribution of leaflets to the public places
- Notice Boards
- Website
- Telecommunication Tools
- Public Meetings

The Grievance Mechanism<sup>5</sup> (sometimes also called Grievance Procedure) will be prepared according to existing EIA and WB policies, procedures, laws and regulations.

The project tackles core municipal investments and services such as water, sanitation, transport and some basic energy facilities that citizens expect municipalities to provide. A grievance redressal and feedback mechanism for the SCP II will be set up to ensure that beneficiary feedback and grievances are addressed by a three-level in-country mechanism consisted of municipalities/utilities, Ilbank and its PMU, and Responsible Court of First Instance and that the actions taken are reported publically to ensure transparency and accountability. All the municipalities/utilities in Turkey have 'White Tables' which are active GRMs for tracking grievances, both online and through a toll-free number.

The SCP II aims to improve the current 'White Table' mechanism in the municipalities/utilities by identifying grievances/feedback related to the sub-investments under SCP-II. Any grievance related to a sub-investment financed under the SCP-II will be first logged at the municipality/utility level and will be addressed by the PIU satisfactorily within a certain period. If the complainant is not satisfied with the complaint resolution, then the case will be submitted to further levels. There will be a toll-free number and online and

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<sup>5</sup> Municipalities establish the Grievance Mechanism through the White Table system.

SMS channels available for citizens to submit grievances through the 'White Table' system regarding the SCP-related grievances.

Although there is no obligation, a Public Grievance Form (See Annex 3) has been prepared for convenience. The selected municipalities will collect all complaints and concerns through the White Table system to achieve and attempt to solve or mitigate related issues within a reasonable timeframe. The municipalities should report the statistics of grievances to the ILBANK

The received complaints/comments will be resolved in a certain period of time as it is set forth in the national law and White Table System of the relevant Municipality.

### ***The White Table System***

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

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

Citizens can access the White Table by calling the Call Center (Alo 153), internet page or in person. There will be a tracking number given for each comment/complaint that allows following up the status of the report. Alo 153 Call Center intends to provide better quality assistance and faster solutions for concerned residents through the White Table solutions team. There is also an internet page of municipalities which includes a White Table section that allows the residents to contact public relations experts electronically. Also, the residents can apply their requests in person for an instant solution.

The White Table system provides data management through the feedback of the citizens, however due to some organizational barriers (lack of specific departments and personnel); the system may disable itself to address the received concern/comments. Therefore, this system will be improved as mentioned above and will be tailored for the sub-project needs, as necessary.

## ANNEX 1. SUGGESTED FORMATS

### **Annex 1A. Environmental and Social Impact Assessment (ESIA) Report for a Category A Project**

An Environmental Impact Assessment (ESIA) report for a Category A project focuses on the significant environmental and social issues of a project. The report's scope and level of detail should be commensurate with the project's potential impacts. The report and the executive summary submitted to the Bank are prepared in English.

The EA report should include the following items (not necessarily in the order shown):

(a) *Executive summary.* Concisely discusses significant findings and recommended actions.

(b) *Policy, legal, and administrative framework.* Discusses the policy, legal, and administrative framework within which the ESIA is carried out. Explains the environmental and social requirements of any cofinanciers. Identifies relevant international environmental agreements to which the country is a party.

© *Project description.* Concisely describes the proposed project and its geographic, ecological, social, and temporal context, including any supporting infrastructure that may be required (e.g., dedicated pipelines, access roads, power plants, water supply, housing, and raw material and product storage facilities). Indicates the need for any resettlement plan or indigenous peoples development plan (see also subpara. (h)(v) below). Normally includes a map showing the project site and the project's area of influence.

(d) *Baseline data.* Assesses the dimensions of the study area and describes relevant physical, biological, and, socioeconomic conditions, including any changes anticipated before the project commences. Also takes into account current and proposed development activities within the project area but not directly connected to the project. Data should be relevant to decisions about project location, design, operation, or mitigatory measures. The section indicates the accuracy, reliability, and sources of the data.

(e) *Environmental and Social impacts.* Predicts and assesses the project's likely positive and negative impacts, in quantitative terms to the extent possible. Identifies mitigation measures and any residual negative impacts that cannot be mitigated. Explores opportunities for environmental and social enhancement. Identifies and estimates the extent and quality of available data, key data gaps, and uncertainties associated with predictions, and specifies topics that do not require further attention.

(f) *Analysis of alternatives.* Systematically compares feasible alternatives to the proposed project site, technology, design, and operation—including the "without project" situation—in terms of their potential environmental impacts; the feasibility of mitigating these impacts; their capital and recurrent costs; their suitability under local conditions; and their institutional, training, and monitoring requirements. For each of the alternatives, quantifies the environmental and social impacts to the extent possible, and attaches economic values where feasible. States the basis for selecting the particular project design proposed and justifies recommended emission levels and approaches to pollution prevention and abatement.

(g) *Environmental and Social Management Plan (ESMP).* Covers mitigation measures, monitoring, and institutional strengthening; see outline in [OP 4.01, Annex C](#).

(h) *Appendixes*

- (i) List of EA report preparers—individuals and organizations.
- (ii) Referenced—written materials both published and unpublished, used in study preparation.
- (iii) Record of interagency and consultation meetings, including consultations for obtaining the informed views of the affected people and local nongovernmental organizations (NGOs). The record specifies any means other than consultations (e.g., surveys) that were used to obtain the views of affected groups and local NGOs.
- (iv) Tables presenting the relevant data referred to or summarized in the main text.
- (v) List of associated reports (e.g., resettlement plan or indigenous peoples development plan).

## Annex 1B. Environmental and Social Management Plan

(a) **Responsible Party**: The authors who prepared the ESMP along with the date of preparation.

(b) **Project Description**: Present a brief description of the subproject. Include the nature of the investment, the location, and any characteristics of the area that are of particular interest (e.g. near a protected area, area of cultural or historical interest). Also, include a brief description of the socio-economic conditions in the area. One or more simple maps showing project location and relevant neighboring features should be included unless there is compelling reason not to.

(c) **Mitigation Plan**: This should include a description of the steps to be taken to mitigate the major potential impacts on land, water, air and other media as well as possible socio-economic impacts during the planning, design, construction and operation phases and specify cost estimates and institutional responsibilities. Particular attention should be paid to the specification of emission limits (e.g. for wastewater discharge) and design standards (e.g. for solid waste disposal sites), land requirements and how these compare to Turkish laws (which at a minimum must be met) and any other relevant guidelines such as those in directives of the European Union or limits suggested by the World Bank Group Environment, Health and Safety Guidelines or other relevant international norms.

(d) **Monitoring Plan**: This should include a description of the key parameters to be monitored (including monitoring locations, schedules and responsible entities) to ensure that the construction and operation of the project is in conformance with Turkish law and other relevant norms and standards. If such details are covered by permits or construction or monitoring contracts these can be referenced as attachments.

(e) **Institutional Arrangements**: There should be a narrative discussion briefly presenting how the monitoring data is going to be used for sound environmental and social performance - who collects the data, who analyzes it, who prepares reports, who are the reports sent to and how often, what is done by the responsible authorities after they receive the information; and how is non-compliance with the ESMP treated.

(f) **Consultations with Affected Groups and Non-governmental Organizations**:

The following should be included:

- Date(s) of consultation(s);
- Location of consultation(s);
- Details on attendees (as appropriate)
- Meeting Program/Schedule: What is to be presented and by whom;
- Summary Meeting Minutes (Comments, Questions and Response by Presenters)
- Agreed actions.

## ANNEX 2

### SAMPLE IMPACT, MITIGATION AND MONITORING TABLES (TO BE INTEGRATED IN ESIA's, partial ESIA's and ESMP's)

Please note that these sample tables are prepared just for a guidance. Most of the safeguard issues presented in these sample tables are relevant to wastewater treatment plant type of investment. Moreover, the impacts, mitigation measures and monitoring arrangements are not fully listed and should be presented according to sub-project's specific details when tailored for sub-project environmental and social assessment documents.

#### **Mitigation Plan**

| Phase        | Issue                      | Mitigation Measures  | Costs                          | Institutional Responsibility |
|--------------|----------------------------|--|--------------------------------|------------------------------|
| Construction | Interruptions in transport | Positioning clear warning and information signs around the construction zone. Imposing time constraints (e.g. 7AM to 5 PM) for works. Locating and marking alternative roads (roundabouts)   | Included in construction costs | Contractor                   |
| Construction | Transport safety           | Positioning clear warning and information signs around the construction zone. Imposing time constraints for works. Considering disabled, women, children and people with special needs while locating and marking alternative roads (roundabouts)  | Included in construction costs | Contractor                   |
| Construction | Dust                       | Close or cover trucks for the transport of materials. Throwing water on the ground where dust is generated, disposing of excess material and cleaning the location upon the finalization of works. Protective covers or curtains for zone where the largest amounts of dust are generated. | Included in construction costs | Contractor                   |
| Construction | Noise and Vibrations       | Imposing time constraints for works (works in the course of daytime (e.g. 7AM to 5 PM). Establish schedules and/or other forms of  | Included in construction costs | Contractor                   |



| <b>Phase</b> | <b>Issue</b>  | <b>Mitigation Measures</b>   | <b>Costs</b>                   | <b>Institutional Responsibility</b> |
|--------------|---|--|--------------------------------|-------------------------------------|
|              |   | specific limitations for works   |                                |                                     |
| Construction | Exhaust gases from equipment/air quality  | Imposing time constraints for works (e.g. 7AM to 5 PM).  | Insignificant                  | Contractor                          |
| Construction | Spill outs of fuel, lubricant, antifreeze etc. in the course of performance of works may result in the pollution of ground, surface and subterranean water. | Periodic examination of the condition of vehicles and other machinery and equipment used in the course of the performance of works. Compliant warehousing of fuel and lubricant, and in case of a spill out, isolation and cleaning of the location. | Included in construction costs | Contractor                          |
| Construction | Damage to trees and vegetation may onset in the course of construction  | Minimizing the areas requiring the removal of vegetation, and upon finalization of works, replace/restore removed vegetation. Special measures if needed to avoid damage to protected trees or species.  | Included in construction costs | Contractor                          |
| Construction | Deposit of excavated soil, erosion, landslides or sedimentation may occur.  | Depositing all excess excavated material in a compliant manner into a carefully selected landfill determined by relevant municipal bodies for utility affairs.   | Included in construction costs | Contractor                          |
| Construction | There is a possibility of discovering artifacts or other cultural and historical items of value   | Discontinuing all works. Contact responsible authorities. Organizing all necessary measures to protect the location. No works to proceed until official notification is received   | No costs involved              | Contractor                          |
| Construction | Periodic interruptions in water   | Scheduling interruptions in water supply in cooperation with the Water Supply Company and informing the population with the  | Included in construction costs | Contractor and Water Supply Company |

| Phase                    | Issue  | Mitigation Measures   | Costs                          | Institutional Responsibility                   |
|--------------------------|--|---|--------------------------------|--|
|                          | supply to neighboring population   | objective of minimizing the negative effect on the population   |                                |  |
| Construction             | Excavated and removed material is harmful to environment if it is not disposed of adequately. Especially if the material or waste is dangerous or might be dangerous (such as, for example, asbestos and cement pipes, pieces of profiles etc) | All non-dangerous waste and excavated material generated in the course of construction has to be deposited in the landfill and in a manner that is not harmful to the environment. Stone, soil and other materials that may be reused shall be utilized in the procedure of project realization. Materials that cannot be used and dangerous waste should be removed in compliance with entity level regulations. | Included in construction costs | Contractor<br><br>Relevant inspection services |
| Construction             | Access to common resources or services may be interrupted due to construction works  | Time schedule for all construction works should be communicated with local communities prior to construction. Alternative and secure means to access resources and services should be introduced.   | Included construction costs    | Contractor                                     |
| Construction / Operation | Identification of vulnerable groups impacted by the subprojects  | Certain groups that may be considered vulnerable (people with disabilities, waste pickers, elderly, refugees, certain groups with livelihood dependencies in the project region) should be identified. There engagement in project planning and implementation should be ensured through consultations.<br><br>Certain vulnerable groups (ie. waste pickers) might be earning                                     | Included in construction costs | Municipality                                   |

| Phase                    | Issue  | Mitigation Measures  | Costs                          | Institutional Responsibility |
|--------------------------|--|--|--------------------------------|------------------------------|
|                          |  | income from the project affected area/land. Ensure that they are informed about the project and can continue to generate income.   |                                |                              |
| Construction / Operation | Involuntary Resettlement / Negative impacts on livelihoods of project affected people  | <p>Design works to minimize the involuntary land take</p> <p>Preparation of a Resettlement Action Plan</p> <p>Compensate losses resulted from involuntary resettlement</p> <p>Additional income restoration measures through livelihood restoration plans. Due to change in mean of transport or modernization in transport, a certain group who generate income from that particular mean of transport might be negatively impacted and lose jobs. Job replacement benefits or other livelihood restoration options (training, alternative job arrangements etc) should be offered/if there are people with special needs (elderly, women, children etc) or disabled who could be negatively impacted from the construction ensure the temporary measures for accessibility is sustained)</p> | Included in construction costs | Municipality                 |
| Construction             | Labor Influx (Not all subprojects may have labor influx issues, however projects with long term construction Works will require camps sites to be established to accomodate workers. Conflicts | For subprojects that may have labor influx issues, camp sites should be arranged to properly accomodate workers and meet thier needs within the camp site. Workers must be provided with relevant trainings as needed.   | Included in construction costs | Municipality                 |

| Phase                     | Issue  | Mitigation Measures  | Costs                           | Institutional Responsibility          |
|---------------------------|--|--|---------------------------------|---------------------------------------|
|                           | may arise between communities and workers)   |  |                                 |                                       |
| Operations / exploitation | Poor operation may result in inadequate water quality released to the general population       | Establish emergency procedures for notification and alerting the public  | Included in the operating costs | Operator of the water treatment plant |
| Operations / exploitation | Environment safety hazards from chlorine storage and use                                       | Establish continuous chlorination control and monitoring, chlorination equipment maintenance procedures, storage procedures, and emergency response procedures. Chlorination plant should have ambient monitoring and locked. Accessible only to authorized staff. | Included in the operating costs | Operator of the water treatment plant |
| Operations / exploitation | Chlorine and other process chemicals leaks and spills  | Establish safe delivery/storage/handling procedures in accordance with material safety data sheets (MSDSs). Immediately contain and cleanup any spilled material.  | Included in the operating costs | Operator of the water treatment plant |
| Operations / exploitation | Process sludge (filtration and flocculation processes) and wastewaters from equipment cleaning | Sludge to be disposed in site approved by municipality. Wastewaters discharged into municipal wastewater collection system   | Included in the operating costs | Operator of the water treatment plant |

*Monitoring Plan*

| <b>Phase</b> | <b>Which parameters shall be monitored</b>                                       | <b>Where shall the parameters be monitored</b>  | <b>How shall the parameters be monitored</b>   | <b>When shall the parameters be monitored</b> | <b>Costs</b>                   | <b>Responsibility</b>       |
|--------------|--|---|--|---|--------------------------------|-----------------------------|
| Construction | Interruptions of transport, transport safety and to common resources or services | On the location and around the location   | According to complaints of the population in the vicinity or transport participants                                    | On the weekly basis in the course of works    | Included in construction costs | Contractor, Regulatory body |
| Construction | Dust generation  | On the location and around the location   | Visually, on the basis of irritation of the breathing system, complaints of the population in the vicinity             | On the weekly basis in the course of works    | Included in construction costs | Contractor, Regulatory body |
| Construction | Unpleasant effects of noise, vibration and exhaust gasses                        | On the location and around the location   | By listening, complaints of the population in the vicinity and workers   | On the weekly basis in the course of works    | Included in construction costs | Contractor, Regulatory body |
| Construction | Spill outs of fuel, lubricant, antifreeze etc                                    | Below and around the place where materials are stored and used. Near the vehicles and around the vehicles | Visual examination to determine the spill out  | On the daily basis in the course of works     | Included in construction costs | Contractor, Regulatory body |
| Construction | Reductions in air quality levels by emissions from mechanization                 | On the location and around the location   | Visually, on the basis of irritation of the breathing system, complaints of workers and the population in the vicinity | On the weekly basis in the course of works    | Included in construction costs | Contractor, Regulatory body |

| <b>Phase</b> | <b>Which parameters shall be monitored</b>  | <b>Where shall the parameters be monitored</b>         | <b>How shall the parameters be monitored</b>  | <b>When shall the parameters be monitored</b>             | <b>Costs</b>                   | <b>Responsibility</b>                                |
|--------------|---|--|---|---|--------------------------------|--|
| Construction | Removal of vegetation and subsequent replanting of the area   | On the location and around the location                | Visually in the course of works, examination and photographing before and after the works | Before and after the works on construction                | Included in construction costs | Contractor, Regulatory body                          |
| Construction | Changes on the ground, erosion, as a consequence of excavation and depositing of materials                      | On the location  | Visually, geotechnical examinations   | Before the initiation of works and in the course of works | Included in construction costs | Contractor, Regulatory body                          |
| Construction | Discovery of artifacts and other items of cultural and historical value   | On the location and around the location                | Visually in the course of works, minutes from construction site                           | On the daily basis in the course of works                 | No costs involved              | Contractor, Regulatory body                          |
| Construction | Periodic interruptions in water supply  | On the location and throughout the water supply system | Public information, on the basis of minutes.  | On the daily basis in the course of works                 | No costs involved              | Contractor, Regulatory body,<br>Water Supply Company |
| Construction | Excavated and removed material disposal practices. Especially if the material or waste is dangerous or might be | Demolition/ removal site, disposal site,               | Visual at both locations  | Weekly  | No costs involved              | Contractor,<br>Water Supply Company                  |

| Phase                     | Which parameters shall be monitored  | Where shall the parameters be monitored                     | How shall the parameters be monitored  | When shall the parameters be monitored | Costs  | Responsibility                   |
|---------------------------|--|---|--|--|--|----------------------------------|
|                           | dangerous (such as asbestos and cement pipes)  |   |  |  |  |                                  |
| Operations / exploitation | Environment safety hazards from chlorine storage and use                                       | Chlorine storage building                                   | Check operation of chlorine dosing system, satisfactory operation of chlorine ambient monitoring devices | Monthly                                | No costs involved                              | Contractor, Water Supply Company |
| Operations / exploitation | Chlorine and other process chemicals leaks and spills  | Chlorine storage building,<br>Process chemical storage area | Visual   | Weekly                                 | No costs involved                              | Contractor, Water Supply Company |
| Operations / exploitation | Process sludge (filtration and flocculation processes) and wastewaters from equipment cleaning | Filtration and flocculation process areas, disposal sites   | Visual   | Monthly                                | No costs involved                              | Contractor, Water Supply Company |
| Construction / Operation  | Engagement activities with vulnerable groups   | On the location and around the location                     | Through records held for each engagement activity  | Monthly                                | Included in construction and operational costs | Municipality                     |
| Construction / Operation  | Cases of land acquisition and economic displacement (impacted livelihoods)                     | On the location and around the location                     | Land acquisition records, records on filed court cases, grievances received on livelihoods,              | Monthly                                | Included in construction and operational costs | Municipality                     |
| Construction              | Labor influx issues  | On the location and around the location                     | Complaints of the population in the vicinity and workers   | Monthly                                | Included in construction costs                 | Municipality                     |

### Annex-3 SAMPLE OF GRIEVANCE FORM

|   |  |   |
|---|--|---|
| <b>Reference No</b>   |  |   |
| <b>Name – Surname</b><br><i>Although giving name and address is not compulsory, it should be kept in mind that during the feedback process regarding the grievance some problems may occur due to lack of information</i> |  |   |
| Please mark how you wish to be contacted  |  | Please provide details for your preferred communication |
| E-mail  |  |   |
| Telephone   |  |   |
| Mail  |  |   |
| Other   |  |   |
| <b>Province/Town/Settlement</b>   |  |   |
| <b>Date</b>   |  |   |
| <b>Category of the Grievance</b>  |  |   |
| 1. On abandonment (hospital, public housing)  |  |   |
| 2. On assets/properties impacted by the project   |  |   |
| 3. On infrastructure  |  |   |
| 4. On decrease or complete loss of sources of income  |  |   |
| 5. On environmental issues (ex. pollution)  |  |   |
| 6. On employment  |  |   |
| 7. On traffic, transportation and other risks   |  |   |
| 9-Other (Please specify):   |  |   |
| <b>Description of the Grievance</b> What did happen? When did it happen? Where did it happen?<br>What is the result of the problem?   |  |   |
| <b>What would you like to see happen to resolve the problem?</b>  |  |   |

**Signature:**

**Date:**

SAMPLE OF GRIEVANCE CLOSEOUT FORM



|   |                                       |
|---|---------------------------------------|
| Grievance closeout number:                              |                                       |
| Define immediate action required:                       |                                       |
| Define long term action required (if necessary):        |                                       |
| Compensation Required?                                  | [ ] YES [ ] NO                        |
| <b>CONTROL OF THE REMEDIATE ACTION AND THE DECISION</b> |                                       |
| Stages of the Remediate Action                          | Deadline and Responsible Institutions |
| 1.  |                                       |
| 2.  |                                       |
| 3.  |                                       |
| 4.  |                                       |
| 5.  |                                       |
| 6.  |                                       |
| 7.  |                                       |
| 8.  |                                       |

### COMPENSATION AND FINAL STAGES

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

Notes:

Name-Surname and Signature

Date..../...../.....

Of the Complainant:

Representative of the Responsible Institution/Company

Title-Name-Surname and Signature

## ANNEX 4. TABLE OF CONTENTS FOR THE PUBLIC CONSULTATION DOCUMENTATION

- Manner in which notification of the consultation was announced: media(s) used, date(s), description or copy of the announcement
- Date(s) consultation(s) was (were) held
- Location(s) consultation(s) was (were) held
- Who was invited  
Name, Organization or Occupation, Telephone/Fax/e-mail number/address (home and/or office)
- Who attended  
Name, Organization or Occupation, Telephone/Fax/e-mail number/address (home and/or office)
- Meeting Program/Schedule  
What is to be presented and by whom
- Summary Meeting Minutes (Comments, Questions and Response by Presenters)  
List of decisions reached, and any actions agreed upon with schedules, deadlines and responsibilities.

## ANNEX 5. CONSULTATION MEETING

The consultation meeting for ESMF has been conducted on January 12, 2018 and the following agencies were invited:

- Antalya Water and Wastewater General Directorate (ASAT)
- Land Registry and Cadaster General Directorate
- National Property General Directorate
- Local Administrations General Directorate
- Union of Municipalities
- EIA, Permitting and Inspection General Directorate

Amongst the invited parties, Local Administrations General Directorate and EIA, Permitting and Inspection General Directorate did not attend to the meeting.

In the consultation meeting, The Environmental and Social Management Framework (ESMF) which has been prepared in line with WB OP 4.01 and Turkish Regulation was discussed. In addition, detailed discussions were conducted regarding the environmental and social assessment documents that Antalya Water and Wastewater. Administration will prepare within the scope of the Sustainable Cities 2 Project. At the end of the meeting, question and answer session was held. Participants list and minutes are prepared for the meeting and is presented below:

## SUSTAINABLE CITIES PROJECT – II

### ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK LAND ACQUISITION AND RESETTLEMENT POLICY FRAMEWORK MINUTES OF THE MEETING 12.01.2018

#### Antalya Water and Wastewater General Directorate (ASAT)

- Q: In the site specific Environmental and Social Management Plan procedures is it necessary to conduct a public consultation meeting?  
A: Yes. When the draft ESMP is prepared a public consultation meeting should be conducted before finalizing the document as final ESMP.
- Q : Can we prepare one joint ESMP for the central drinking water network and sewer network?  
A: A joint ESMP can be prepared for the mentioned projects.
- Q: For the Manavgat submarine outfall project is it required to prepare an ESIA or an ESMP? If it is decided that an ESMP will suffice, can we prepare a joint ESMP for Manavgat network project and the outfall?  
A: If the submarine outfall route is not passing a sensitive zone and it's parallel to the already existing line than an ESMP can be sufficient. And a joint ESMP can be possible.
- Q: How long the monitoring period should be in the ESMPs?  
A: Legally the monitoring phase continues during the repayment period. In practice, for the network project the final acceptance can be accepted as the completion time for the monitoring phase. In the waste water treatment plant, it's necessary to continue monitoring during the entire project life.
- Q: Is it possible to add an article to the construction contracts in order to better enforce the implementation of the monitoring?  
A: The contracts already include articles regarding mandatory monitoring.

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- Q: The wastewater treatment plants are designed to include advanced biological treatment and therefore has positive impacts on environment. Why it is still necessary to prepare ESIA's instead of ESMPs?  
A: If the project involves only rehabilitation of the wastewater treatment plant, the discharge is done to a creek and there are no sensitive zones in the region, then an ESMP can be possible.
- Q: Regarding the grievance redress mechanism, as discussed in the ESMF, will it be required to differentiate the grievances for SCP which are received by White Table (ALO 153)?  
A: Yes



## SÜRDÜRÜLEBİLİR ŞEHİRLER PROJESİ-II İSTİŞARE TOPLANTISI KATILIMCI LİSTESİ

|                 |               |                   |
|-----------------|---------------|-------------------|
| Konu            | ESMF ve LARPF |                   |
| Tarih           | 12.01.2018    |                   |
| Başlangıç Saati | 10:00         | Bitiş Saati 12.00 |
| Toplantı Yeri   | Çukurambar    |                   |



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TÜRKİYE NİN YAPICI GÜCÜ

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