FESAS – II
2026

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

Agricultural Employment Support through Enhanced Market Linkages
PHASE II (P508375)

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AGRICULTURAL CREDIT COOPERATIVES OF TURKIYE

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK

Agricultural Employment Support through Enhanced Market Linkages

PHASE II

FEBRUARY 2026

ABBREVIATIONS AND ACRONYMS

ACC	Agricultural Credit Cooperatives
ACC-CU	Central Union of Agricultural Credit Cooperatives
CF	Contract Farming
C-ESMP	Contractor Environmental and Social Management Plan
CSA	Climate-Smart Agriculture
CHS	Community Health and Safety
DMM	Directorate for Migration Management
ESMF	Environmental and Social Management Framework
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
EU	European Union
E&S	Environmental and Social
FAO	Food and Agricultural Organization of the United Nations
FESAS-I	Formal Employment Support in Agriculture Sector Project Phase I
FESAS-II	Agricultural Employment Support through Enhanced Market Linkages Project Phase II
GBV	Gender-Based Violence
GM	Grievance Mechanism
LMP	Labor Management Procedures
LM Plan	Labor Management Plan
M&E	Monitoring and Evaluation
MoFSS	Ministry of Family and Social Services
MoLSS	Ministry of Labor and Social Security
MoEUCC	Ministry of Environment, Urbanization and Climate Change
OHS	Occupational Health and Safety
İŞKUR	Turkish Employment Agency
PIU	Project Implementation Unit
POM	Project Operational Manual
SEA/SH	Sexual Exploitation and Abuse / Sexual Harrasment
SEP	Stakeholder Engagement Plan
SSI	Social Security Institute
TA	Technical Assistance
TurkStat	Turkish Statistical Institute
WB	World Bank

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1. INTRODUCTION

1.1. Project Summary

Agricultural Employment Support through Enhanced Market Linkages Phase II (FESAS-II) builds on the experience of the Formal Employment Support in Agriculture Sector Project Phase I (FESAS-I). The six provinces (Adana, Adiyaman, Bursa, Gaziantep, Izmir, and Mersin) covered in phase 1, is included for FESAS-II.

FESAS-II comprises three components: (1) wage subsidies and support for formalization of jobs; (2) enhancement of aggregation capacity of Agricultural Credit Cooperatives' (ACC) of Turkiye; and (3) implementation support and institutional capacity building.[1]

Component 1: Wage Subsidies and Support for Job Formalization

This component promotes formal employment for vulnerable groups by addressing financial and informational barriers. It includes wage subsidies for farmers hiring workers formally and technical assistance (TA) on formal employment processes Awareness-raising activities will inform workers about formal employment benefits, reaching approximately 3,200 workers. Potential environmental and social (E&S) risks include labor rights violations, worker vulnerability, and occupational health and safety (OHS) concerns.

Component 2: Enhancement of ACC's Aggregation Capacity

To improve crop processing and quality, micro and small grants will be provided to primary ACCs for investments in drying, storing, grading, sorting, and packaging facilities. This will strengthen the agricultural value chain. Potential E&S risks include increased waste generation, energy use, and minor construction-related impacts such as dust, noise, OHS, community health and safety (CHS), and waste management.

Component 3: Implementation Support and Institutional Capacity Building

This component will ensure effective project implementation by funding the Project Implementation Unit (PIU), training ACC staff, maintaining the Grievance Mechanism (GM), and supporting communication and monitoring efforts. Key E&S considerations include ensuring robust stakeholder engagement, transparent grievance mechanisms, and institutional capacity for environmental and social compliance.

1.2. Implementing Institution

The ACC Central Union (ACC-CU) is the parent organization of the primary ACCs and regional ACCs. The primary ACCs were created through the *Agricultural Credit Cooperatives and Unions Law No. 1581*, according to which agricultural producers among themselves may form ACCs that are based on the principle of mutual assistance to protect their economic interests and to meet their requirements relating to their profession and livelihood. The primary ACCs, which are separate legal entities and have been formed in one or more provinces, come together to establish regional ACCs. There are 18 regional ACCs, covering every province in Turkiye. The regional ACCs form the ACC-CU, which is a separate legal entity and the parent organization of the primary ACCs and regional ACCs.

ACC-CU will implement the FESAS-II, with its relevant departments carrying out the proposed activities in line with their mandates as defined in the ACC-CU organizational structure. The PIU will support the responsible departments in carrying out project specific tasks and will include technical specialists located in each of the provinces participating in the project.

[1] For further details, visit the PAD document available on the World Bank webpage: https://projects.worldbank.org/en/projects-operations/document-detail/P508375?type=projects

At the field level, the primary ACCs will carry out additional responsibilities arising from project requirements. Since all contracts will be signed at the primary ACC level, reaching out to farmers, preparing and signing contracts, performing verifications during the production process, ensuring compliance with environmental and social requirements and other contractual obligations will be the core of on-farm processes that the ACCs are responsible for. In addition, the ACCs will function as the primary information and registry point for farmers who visit the ACC and inquire or apply for programs under the project.

1.3. Purpose of the Environmental and Social Management Framework

This Environmental and Social Management Framework (ESMF) establishes procedures and responsibilities to ensure the avoidance, minimization, or mitigation of potential environmental and social impacts and risk caused by the project. It provides guidance for assessing project activities, developing site-specific environmental and social management plans, and ensuring compliance with the World Bank's (WB) Environmental and Social Framework (ESF), its Environmental and Social Standards (ESSs), and Turkiye's national laws and regulations.

The framework outlines the policy and regulatory context, potential environmental and social risks, assessment procedures, mitigation measures, institutional arrangements, and consultation and disclosure processes. It also includes capacity-building support for project beneficiaries, consultants, and contractors to ensure effective implementation.

2. BASELINE DATA

2.1. Location and Size

Turkiye is a country located on an area where Europe meets Asia and is located at latitude 38°57'49.5'' N and longitude 35°14'36'' E with a total of area of 780,043 km2. Turkiye is bounded by the Aegean Sea in the west, by the Mediterranean Sea in the south and by the Black Sea in the north. The country is bordered by Armenia, Iran, and Azerbaijan (exclave of Nakhchivan) in the east, by Georgia in the northeast, by Bulgaria and Greece in the northwest, and by Iraq, and Syria in the southeast.

The project be implemented in six (6) provinces (Figure 1): Adana, Adıyaman, Bursa, Gaziantep, İzmir, and Mersin. These provinces exhibit farming patterns that are likely to promote worker formalization and have high crop production, making them potential locations for achieving the project's goal.

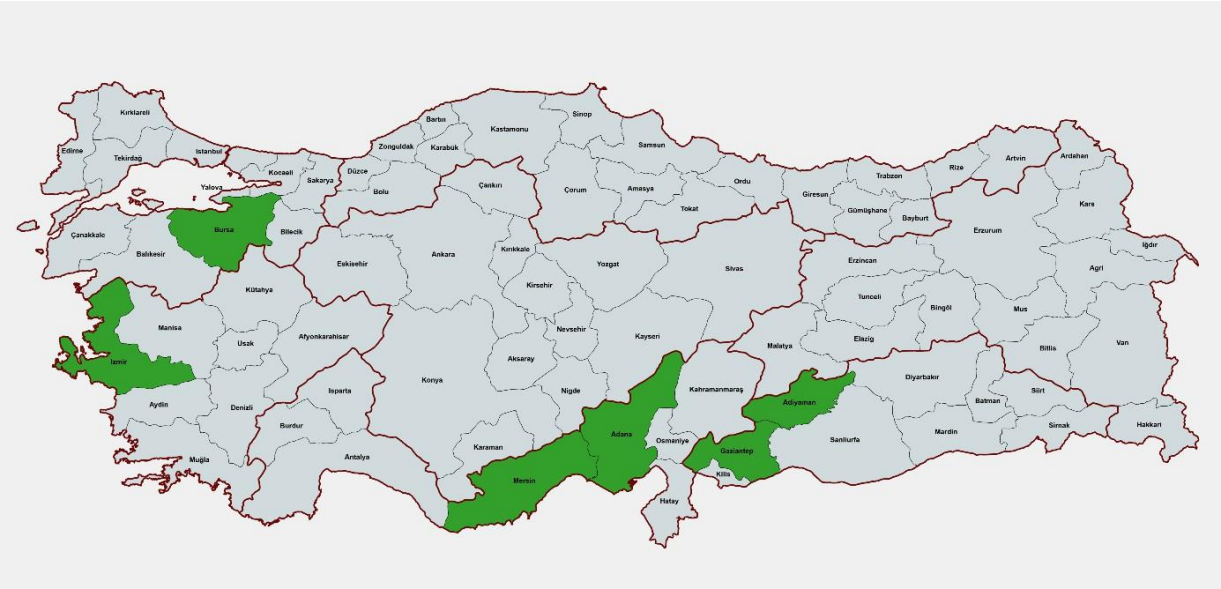

Figure 1. Project Provinces

Adıyaman is situated in the Southeastern Anatolia Region, covering an area of 7,337 km². The province is comprised of eight (8) districts and has a population of 604,978. The economy of Adiyaman is predominantly driven by agricultural activities.

Adana lies in the Cukurova region, to the south of the Taurus Mountains. With a coastline of 160 kilometers along the Mediterranean Sea, Adana is strategically located on major transportation routes that link Europe to Asia. The city spans an area of 17,253 km² and has a population of 2,270,298. The region's fertile soil plays a crucial role in supporting Adana's agricultural-based economy.

Bursa is located in the southern part of the Marmara Region, approximately 20 kilometers from the Sea of Marmara. The city has a population of 3,214,571 and covers an area of 10,882 km². Bursa is an industrial center renowned for its textile, automotive, machinery, and metal manufacturing industries, in addition to its agricultural-based sectors, food production, and furniture manufacturing, all of which significantly contribute to its economic output.

Gaziantep, located at the intersection of the Mediterranean and Southeastern Anatolia regions, spans an area of 6,222 km² and has a population of 2,188,481. Over half of Gaziantep's land is suitable for agriculture, which includes olive groves, peanut fields, fruit and vegetable gardens, vineyards, cotton, and wheat cultivation.

İzmir is positioned in the western part of the country and has a coastline along the Aegean Sea. Izmir covers an area of 12,007 km² and has a population of 4,479,525. The city is recognized for its fertile

land, with agricultural activities playing a vital role in its economy.

Mersin, located in the Mediterranean Region, spans an area of 15,853 km², with 608 kilometers of land borders and 321 kilometers of coastline. Mersin is one of the most developed provinces in Turkiye due to its fertile lands and advanced industries. The population of Mersin is approximately 1,800,000 people.

2.2. Environmental Baseline

2.2.1. Seismicity and Climate-Related Hazards

A significant portion of Turkiye is located within an active seismic zone, making seismic movements and associated risks a major concern for all cities. In cities such as Adıyaman, Adana, and Gaziantep, these threats can pose risks, particularly in agricultural areas and residential zones. Adana, being a coastal city, is especially vulnerable to sea level rise and coastal erosion. On the other hand, climate change has exacerbated climate-related hazards across all cities, with extreme temperatures, droughts, and sudden flooding events becoming increasingly prominent. Mersin, as a coastal city, faces risks related to rising sea levels that could impact both ecosystems and infrastructure, while cities such as Bursa is grappling with challenges such as increased temperatures and water shortages. These threats are impacting the existing infrastructure and local ecosystems of these cities, underscoring the need for adaptive measures.

2.2.2. Water Resources and Wastewater Management

Across Turkiye, water resources are becoming increasingly strained, and the efficient use and provision of water have emerged as significant concerns among cities. In cities like Adıyaman and Gaziantep, limited water resources make the provision of irrigation and drinking water more challenging. Despite its fertile agricultural lands, Adana faces serious pressures on its water resources, especially due to the high-water consumption in agricultural areas, which can affect water levels. Mersin, being a coastal city, experiences issues related to seawater intrusion, leading to salinity problems in its water supply. Although Izmir has made substantial infrastructure investments to maintain water quality and quantity, wastewater management remains a significant challenge due to the impacts of agriculture and industry. Cities across Turkiye are facing significant challenges related to the conservation and efficient use of water resources. The basins of Türkiye are shown in Figure 2 below.

Figure 2. Turkiye Basins Map

2.2.3. Waste Management

Waste management remains a major unresolved issue in Turkiye's larger cities. In smaller cities like Adiyaman, waste management infrastructure is limited, and there are often deficiencies in the proper segregation and recycling of waste. In larger cities such as Adana and Gaziantep, industrial and population densities lead to very high waste volumes, placing a significant burden on waste collection, segregation, and processing systems. Although Izmir has more advanced waste management systems, the volume of waste generated by tourism and industry remains substantial. In Mersin, coastal tourism has led to significant concerns over marine pollution, and regular coastal clean-up efforts are needed. Overall, recycling rates in these cities have not yet reached desired levels, and there is a pressing need for improvements in waste disposal and management practices.

2.2.4. Biodiversity

Although Turkiye is rich in biodiversity, urbanization and industrialization have led to the shrinking of natural habitats. In cities like Adıyaman, Adana, and Gaziantep, the expansion of agricultural land, deforestation, and the pollution of water ecosystems threaten biodiversity. In Adana, wetlands and local agricultural lands are subject to intense use, which can negatively affect the region's ecosystem diversity. In cities such as Bursa, industrial activities and rapidly growing urban areas pose threats to natural habitats. In İzmir, while coastal ecosystems and marine life are protected, pollution and construction activities are damaging these ecosystems. In Mersin, coastal areas are of great importance for the preservation of marine ecosystems, but coastal construction and industrial activities threaten the biodiversity of these regions. Biodiversity in these cities is generally directly related to local agricultural and industrial activities, which place pressure on ecosystems.

2.3. Social Baseline

2.3.1. Socio-Economic Background

Turkiye has a mixed economy where government and private sector has contribution to economic development. Turkiye economy transferred from agriculture to industry and technology-based activities. Whereas Mediterranean, Black Sea, East Anatolia and South-East Anatolia Regions mainly have contribution to agriculture economy; Marmara Region, Central Anatolia and Aegean Regions has great contribution to industrial economy. In 2023, Türkiye ranked as the 12th largest economy in the world and the 4th in Europe according to Purchasing Power Parity GDP figures.[2]

[2] https://www.trade.gov.tr/data/5b9229ab13b876136466584b/Economic%20Outlook%202024%20December.pdf#:~:text=Quarterly%20GDP%20Growth%20Rates.%20%E2%96%AA%20The%20Turkish,average%20growth%20rate%20of%20T%C3%BCrkiye%20was%205.4%25.

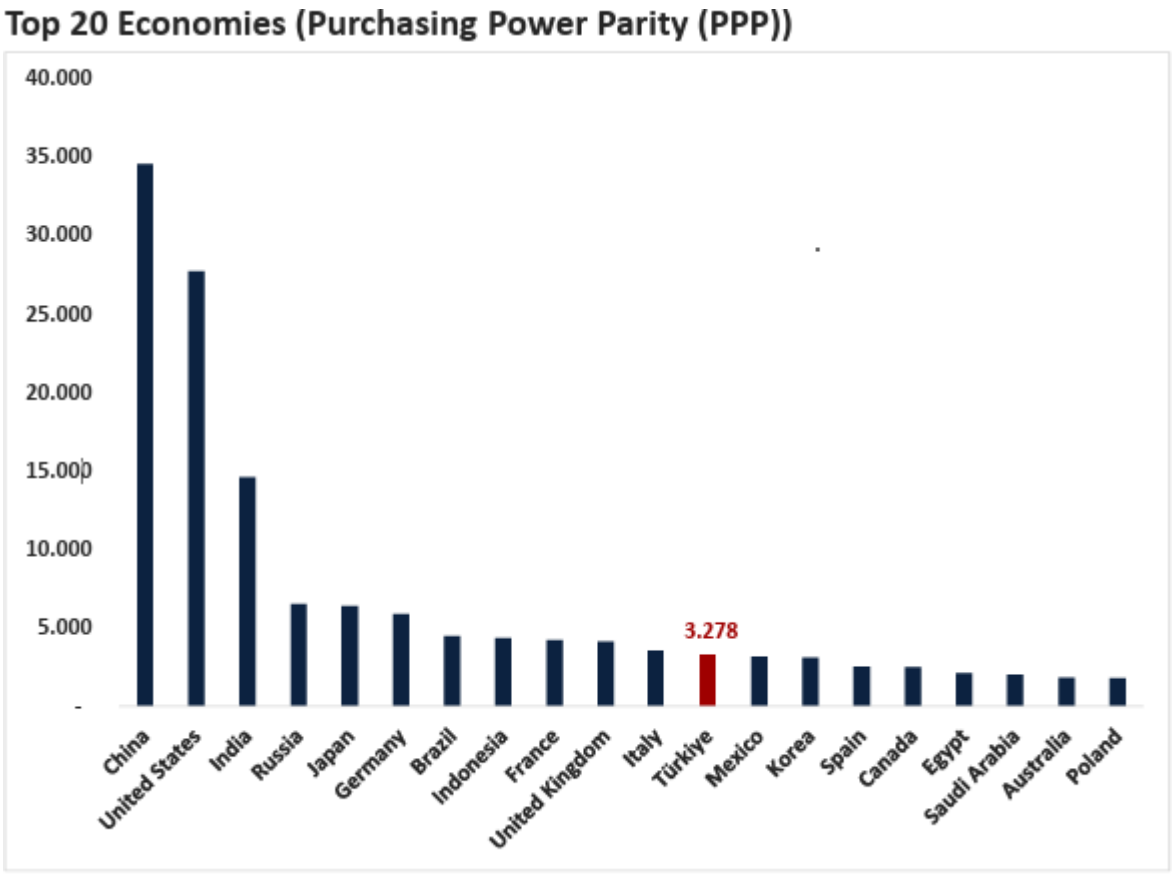

Figure 3: Ranking of Economies by GDP at PPP

Adana is one of the first industrialized provinces of Turkiye and 27% of Turkiye's income comes from industrial activities originated from Adana. Since Adana has fertile lands such as Çukurova Region, highest income comes from agriculture related activities. Food production and processing (21%), textile (19%), production of chemical products (14%) and production of rubber and plastic products (8%) are the leading sectors that participate to Adana economy.

Adıyaman's economy is mainly based on agricultural activities. Besides agricultural economy, Adıyaman has also industrial facilities in textile (24%), food (21%), stone and soil-based products (18%), energy (12%), metal processing (8%), furniture (6%), etc. Adıyaman has been given some financial incentives to attract new investments to foster industrial growth in the region.

Bursa ranks 4th in terms of the added value it provides to the national economy. The leading sectors of Bursa are automotive (%34), textile (22%) and agro-food (8%) These sectors come to the forefront in Bursa and add value to Bursa economy. Besides its prominent sectors, Bursa also produces high technology products with its emerging sectors such as rail systems, aviation and defense.

Gaziantep is the most developed province of Southeastern Anatolia Region. 40% of Gaziantep's income comes from agriculture and 25% from industry. 60% of total population works in agriculture sector. It is also an important commercial center. Weaving, yarn, flour, soap, detergent, leather, plastic, cement, tomato paste, biscuit and oil factories are the predominant facilities in Gaziantep industry.

İzmir is the 3rd largest city of Turkiye in terms of population and contribution to Turkiye economy. The predominant sector in İzmir is the services sector with a ratio of 57.5%, industry comes second with

37.6% and agriculture sector with 4.9%.

Mersin generates its income from industrial activities (40%), agriculture (%30) and trade (10%) activities. Since agricultural activities has an important role in Mersin economy most of the industrial facilities are working in food production sector. The ratio of food production sector is 33% and the following sectors' ratio are; production of rubber and plastic products (8%), production of machinery and equipment (6%), production of mineral products (6%) and other sectors (47%, mining, production of metal products, furniture, textile, chemicals, etc.

2.3.2. Crop Production

Agriculture plays a significant role in Turkiye's economy, and the selected project provinces are key hubs for agricultural activities. These provinces were chosen based on various criteria, with a primary focus on the presence of vulnerable groups and crop production potential that supports formal employment. While additional factors were considered, these two parameters were prioritized to align with the project's objective of creating sustainable livelihoods through formal employment in the agricultural sector. Table 1 provides an overview of the major agricultural products cultivated in each project province, highlighting their potential for generating employment opportunities.

Table 1. Agricultural Products in Selected Provinces

Province	District	Agricultural Product	Planting Period	Harvesting Period
Bursa	Karacabey	Tomato - Pepper	April - May	August - September
	Karacabey	Tomato	May - September	September - October
	Karacabey	Olive - Onion	December	August
	Bandırma	Tomato	May	September - October
	Orhangazi	Olive - Onion	November	December
	Yenişehir	Pepper - Tomato	July	September - October
Izmir	Torbalı	Tomato, Pepper, Bean, Cabbage	July	September - January
	Menderes	Mandarin	October	December
	Ödemiş	Cherry	February-March	December
Adana	Seyhan	Cotton	April - May	September - October
	Çukurova	Tomato	March - May	June - July
		Cucumber	March - April	March - April
	Sarıçam	Citrus (Lemon, Orange)	February - March	November - December
		Grapes	March - April	July - August
		Sugar Beet	March - April	September - October
	Yüreğir	Wheat	October	June-July

		Pepper	March-April	June-July
Adıyaman	Merkez	Wheat	October	June - July
	Gölbaşı	Olive	October	November - December
Mersin	Mezitli	Orange	February - March	November - December
	Anamur	Banana	March	September - October

2.3.3. Population

As of 2024, Turkiye's population is approximately 85 million, making it the 18th most populous country in the world, according to data from the Turkish Statistical Institute. The largest population centers are İstanbul (15.7 million), Ankara (5.9 million), and İzmir (4.5 million), which are also key economic, political, and cultural hubs. These urban areas, while diverse and economically vibrant, also experience significant population influxes as rural populations migrate toward cities in search of better employment opportunities, particularly in the manufacturing, services, and construction sectors. However, a notable portion of Turkiye's population remains in rural areas, with agriculture continuing to be a significant employment sector. According to the Turkish Statistical Institute (TurkStat), around 18% of the working-age population (approximately 15 million people) are employed in agriculture, although this proportion has been steadily declining due to urbanization and the growth of other industries. Despite this trend, rural areas like Adıyaman, continue to rely heavily on farming, with many families engaged in subsistence agriculture or small-scale production.

These rural-to-urban migration patterns contribute to an ongoing demographic shift, with younger populations moving to cities for educational and employment opportunities, while the aging population in rural areas faces challenges in maintaining agricultural productivity. The declining number of agricultural workers in rural areas can affect local economies and food security, increasing reliance on technology and innovation in agricultural practices, as well as on small-scale secondary production industries that process local farm produce.
This migration trend also intersects with economic and social risks. The increasing concentration of population in cities has led to pressures on urban infrastructure, including housing, transportation, and social services. At the same time, rural depopulation may exacerbate challenges in maintaining agricultural output, thereby impacting the livelihoods of agricultural workers and the economic stability of rural communities.

This demographic context is highly relevant to the project's scope, as it highlights both the opportunities and challenges in rural employment, agricultural sustainability, and the development of small-scale secondary production facilities. The project aims to bridge the gap between rural economic needs and urban economic growth, promoting initiatives that can create new job opportunities in rural areas by supporting smallholder farmers and fostering secondary industries that process agricultural products. These initiatives are vital not only for economic growth but also for improving social equity by offering alternative employment paths and reducing rural poverty. However, the social risks are significant: as rural populations decline, traditional agricultural skills may be lost, and labor shortages in farming and related industries could affect agricultural productivity. Furthermore, the influx of migrants to cities could create social tensions over limited job opportunities and housing, especially if new industries in urban centers do not adequately accommodate the growing workforce. Additionally, there is a risk of unequal distribution of resources, particularly in urban areas where lower-income migrants may face challenges integrating into the job market, leading to potential social unrest.

By examining these population dynamics and the associated risks, the project can better anticipate

and mitigate adverse social impacts, ensuring a more sustainable and inclusive approach to addressing agricultural employment challenges and fostering secondary industries in both urban and rural areas.

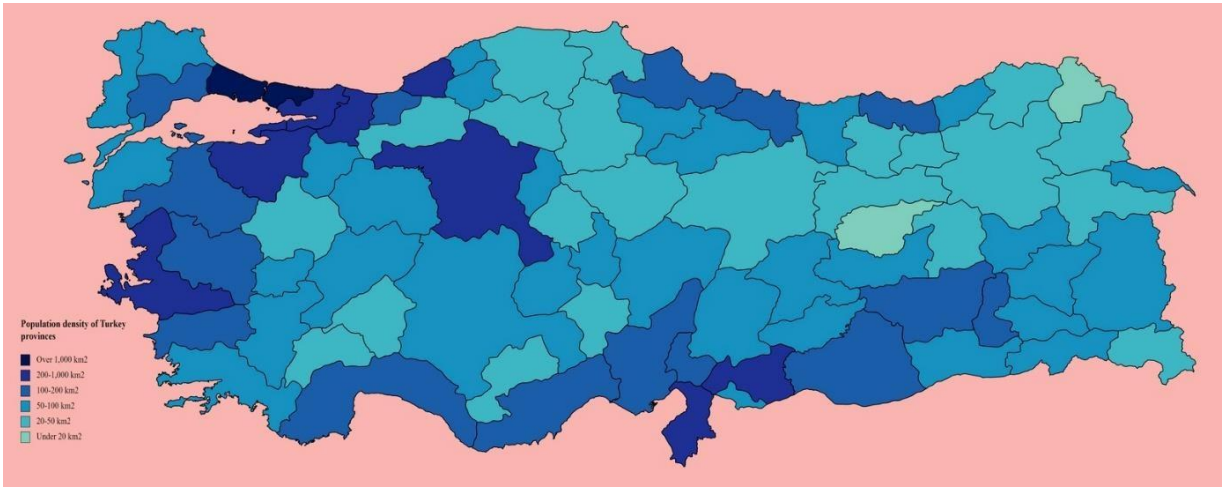

Figure 4. Turkiye Population Density Map

Project provinces include 25.3% total population of Turkiye. Izmir, with a population of 4.4 million, has the largest share among the project provinces, accounting for 20.7% of their total population. In contrast, Adiyaman, with a population of 604,000, represents only 2.8%.

Table 2. Project Provinces Population and Change in 5 Years

Provinces	2018	2023	Pop. Change (5 years)	Province population/Total population of project provinces.
Adana	2.220.125	2.270.298	2.3%	10.5%
Adıyaman	624.513	604.978	-3.1%	2.8%
Bursa	2.994.521	3.124.571	4.4%	14.4%
Gaziantep	2.028.563	2.164.134	6.7%	10.0%
Izmir	4.320.519	4.479.525	3.7%	20.7%
Mersin	1.814.468	1.938.389	6.8%	8.9%

3. DESCRIPTION OF THE ADMINISTRATIVE, POLICY AND REGULATORY FRAMEWORK

3.1. Overview of Key Laws and Regulations

The national legal framework of Turkiye provides comprehensive guidance for managing environmental and social risks and impacts associated with subproject activities under the FESAS-II. Relevant laws, policies, and regulations are summarized in Annex 1. Turkiye's national approach to environmental protection, cultural heritage conservation, and biological resource management has been shaped by both domestic legislation and international agreements ratified by Turkiye. Relevant environmental, occupational health and safety (OHS), and international labor agreements and conventions ratified by Turkiye are listed in ANNEX 1.

Turkish environmental legislation is closely aligned with international standards and the European Union (EU) Directives. These laws are robust, and no significant challenges are anticipated during project implementation. However, in the event of unforeseen issues, responsible authorities will provide oversight, and the PIU will ensure compliance with relevant regulations through centralized and field-level monitoring.

Turkiye has ratified several international conventions relevant to environmental protection, labor rights, and non-discrimination. Key agreements include:

- **ILO Conventions on Labor Rights**: Turkiye has ratified core conventions addressing child labor, forced labor, and workplace discrimination.
- **Convention on Biological Diversity (CBD)**: Ensures conservation of biodiversity, relevant to subprojects affecting natural habitats.
- **UNESCO World Heritage Convention**: Protects cultural and natural heritage sites, ensuring compliance for subprojects near such locations.
- **The United Nations' 17 Sustainable Development Goals**: adopted in 2015, represent a global action plan aiming to end poverty, protect the planet, and ensure prosperity for all by 2030.

3.2. National Environmental and Social Assessment and Permitting

In Turkiye, the **Ministry of Environment, Urbanization, and Climate Change (MoEUCC)** is the primary authority responsible for managing environmental assessments and permitting processes. These processes are governed by the **Environmental Impact Assessment (EIA) Regulation (Official Gazette No. 29186)**, which provides a comprehensive framework for screening, assessing, and managing the environmental and social risks associated with project activities.

Environmental Impact Assessment (EIA) Process in Turkiye

1. **Screening and Categorization:**
    - Subprojects are categorized based on their potential environmental impacts as listed in Annex 1 and Annex 2 of the EIA Regulation:
        - **Annex 1:** Projects with significant potential environmental impacts (EIA required). These projects must undergo a full Environmental Impact Assessment (EIA Report).
        - **Annex 2:** Projects with moderate environmental impacts (screening required). These projects are subject to an initial review, and a decision is made whether a full EIA is required or not).
        - **Exempt Projects:** Projects with negligible risks or impacts are not subject to the EIA process but may require basic environmental assessments depending on site-specific conditions.

2. **Preparation and Submission:**
    - For Annex 1 projects, a detailed EIA report must be prepared, including baseline studies, environmental and social impact analyses, and mitigation measures.
    - For Annex 2 projects, a Project Description Report (PDR) must be submitted, summarizing project details, potential risks, and proposed mitigation measures.
3. **Public Consultation and Approval:**
    - Public consultation is a mandatory requirement for Annex 1 projects under the EIA framework. This process ensures that stakeholder feedback is actively sought, documented, and incorporated into the decision-making process to address environmental and social concerns associated with the project. Following the review of EIA reports or screening documents, the MoEUCC or the relevant **Provincial Directorate of Environment, Urbanization, and Climate Change (PDoEUCC)** issues a decision as:
        - **EIA Positive,**
        - **EIA Negative, or**
        - **No EIA Required.**
4. **Monitoring and Compliance:**
    - Approved projects are monitored by Provincial Directorate of Environment, Urbanization, and Climate Change (PDoEUCC) to ensure compliance with the environmental standards outlined in the EIA decision.
    - Contractors and the PIU will coordinate closely to address any identified non-compliance issues.

4. WORLD BANK STANDARDS AND KEY GAPS WITH THE NATIONAL FRAMEWORK

The project will adhere to the World Bank Environmental and Social Standards (ESSs) and the World Bank Group Environmental, Health, and Safety (EHS) Guidelines. Based on these policies, the environmental and social risk of the project has been categorized as "Substantial". This classification reflects that the identified risks are manageable through appropriate mitigation measures and compliance with both national regulations and World Bank standards.

The World Bank's Environmental and Social Standards applicable to the project activities are summarized below in Table 3.

Table 3. Relevant World Bank ESSs, Gaps with the National Framework and Gap Filling Measures

E&S Standard	Key Gaps and Gap Filling Measures

ESS1: Assessment and Management of Environmental and Social Risks and Impacts	**Relevance:**
	ESS1 applies to FESAS-II due to its potential environmental and social risks, particularly related to labor and working conditions, occupational health and safety (OHS), and potential exclusion risks for vulnerable workers. The expansion of agricultural production also carries risks such as increased pesticide use and water consumption.
	Key Gaps:
	• The national Environmental Impact Assessment (EIA) framework lacks integration of **social impact assessments**, leading to:
	  ○ Inadequate social baselines.
	  ○ Limited assessment of impacts on vulnerable groups and gender-related issues.
	• Limited cumulative impact assessments.
	• Absence of detailed management plans such as Water Quality and Air Quality.
	• Inadequate grievance mechanism implementation for stakeholders and workers.
	Gap Filling Measures:
	• Preparation, implementation, monitoring and reporting of ESMF, site specific ESMPs, SEP, LMP and other relevant sub-management plans to ensure social and environmental risks are identified and mitigated.
	• Strengthening the existing grievance mechanisms to align it with the project standards and ensuring its maintenance and monitoring throughout the project lifecycle.
	• Conducting training programs to improve capacity for environmental, social and OHS risk management.
	• Screen out substantial and high risk subprojects

ESS2: Labor and Working Conditions	**Relevance:** ESS2 is relevant due to potential labor-related risks, including occupational safety hazards, inadequate worker protections, and risks of exploitation. Seasonal and informal workers in agriculture may face vulnerabilities, including lack of contracts and insufficient OHS measures. **Key Gaps:** The national framework for labor management includes robust laws (e.g., Labor Law No. 4857, OHS Law No. 6331 and Turkiye's ratification of relevant ILO Conventions); however, the following gaps exist: • Limited enforcement of OHS compliance in smaller-scale agricultural activities.

	• Absence of worker-specific grievance mechanism. • Risk of child labor and forced labor in agricultural supply chains • Workers and contractors may lack awareness of international labor standards, increasing the risk of non-compliance. **Gap Filling Measures:** • Implementation of LMP with clear provisions on OHS, non-discrimination, and worker rights. • Establishment of accessible grievance mechanisms for all workers. • Regular monitoring and audits to ensure compliance with labor laws.
ESS3: Resource Efficiency and Pollution Prevention and Management	**Relevance:** ESS3 applies due to the potential environmental impacts of increased agricultural production, including soil degradation, pesticide use, and water resource consumption. **Key Gaps:** While Turkiye's regulatory framework provides robust standards for resource efficiency and pollution prevention, the following gaps have been identified: • Limited enforcement of sustainable agricultural practices. • Inadequate waste management and pollution prevention strategies. **Gap Filling Measures:** • Promotion of climate-smart agriculture (CSA) practices, including integrated pest management and efficient irrigation techniques. • Adoption of pollution control measures, such as safe pesticide use and runoff management. • Monitoring of water usage and soil quality. • Develop and enforce site-specific Environmental and Social Management Plans (ESMPs)
ESS4: Community Health and Safety	**Relevance:** ESS4 is relevant due to potential health and safety risks to communities, including exposure to hazardous chemicals, increased traffic risks from agricultural expansion, and lack of awareness about OHS measures. **Key Gaps:** • Weak enforcement of hazardous materials handling. • Limited public awareness on farm-related safety risks. **Gap Filling Measures:** • Providing technical assistance for farmers and awareness raising acitivities for workers • Strengthening pesticide safety and storage regulations. • Improved monitoring of agricultural workplace safety. • Preparing, implementing and monitoring the implementation of site specific ESMPs
ESS5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement	This standard is not relevant within the scope of this Project. The proposed investments are not expected to impact land tenure or require the acquisition of new land. Any activities requiring land acquisition or resulting in economic displacement under ESS5, will not be eligible for financing, with investments limited to existing sites. In case of any non-legal land users on public lands, these sites will be screened out.
1. ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	**Relevance:** ESS6 is relevant due to potential biodiversity impacts from expanded farming activities, including habitat loss and soil erosion. **Key Gaps:**

	• Inadequate integration of biodiversity considerations in agricultural planning. • Limited conservation efforts for critical habitats. **Gap Filling Measures:** • Implementation of sustainable land use practices. • Avoidance of agricultural expansion in ecologically sensitive areas. • Promotion of agroforestry and habitat conservation strategies.
2. ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (ESS7)	This Standard is not relevant as there are no Indigenous Peoples who meet the criteria under ESS7 in Türkiye.
ESS8: Cultural Heritage	**Relevance:** ESS8 is relevant to the project, even though cultural heritage sites are not expected to be present in the project areas. However, there remains a possibility of encountering cultural heritage during refurbishments carried out under micro-scale investments in project provinces which may have a historical and cultural legacy. **Key Gaps:** • Limited proactive screening for cultural heritage in agricultural expansion areas. • Lack of contractor awareness on cultural heritage preservation. **Gap Filling Measures:** • Inclusion of cultural heritage screening in project planning. • Implementation of chance-find procedures for unexpected discoveries. • Implement **chance-find procedures** to ensure proper handling of unexpected discoveries during construction. o Halt work immediately upon discovery. o Notify relevant heritage authorities and follow their guidance for documentation and preservation. While cultural heritage is not expected to pose significant risks in the project, adherence to ESS8 ensures that any potential impacts are effectively managed. The project's proactive approach to cultural heritage will ensure compliance with both national laws and World Bank standards.
ESS9: Financial Intermediaries	Although ACC provides loans to agricultural enterprises, it will not be on-lending project proceeds and thus will not act as a financial intermediary. Hence, this standard is not relevant for the project.
ESS10: Stakeholder Engagement and Information Disclosure	**Relevance:** ESS10 is highly relevant to the project, as effective stakeholder engagement and transparent information disclosure are critical to the success of project activities. Stakeholder engagement is crucial to ensure that farmers, workers, affected communities and other interested parties are properly engaged and informed about project activities, risks, and benefits. Given the scope of the project, multiple stakeholder groups are impacted, necessitating clear and inclusive communication strategies. 1. **Diverse Stakeholder** Groups will be engaged, including affected parties, disadvantaged/vulnerable groups (e.g., women, elderly, disabled), and others indirectly or otherwise interested in the project. 2. **Information Disclosure:** o Timely dissemination of project information, including

	potential impacts, mitigation measures, and schedules, is essential to foster transparency and trust among stakeholders. o Public access to grievance mechanism and updates on the progress of project activities is vital for stakeholder confidence. 3. **Meaningful Consultations:** o Ensuring active participation of all stakeholders, including vulnerable groups, in decision-making processes related to project activities and mitigation measures. While Turkiye has mechanisms for public consultation and information sharing (e.g., Right to Petition Law No. 3071 and Access to Information Law No. 4982), the following gaps may exist: • Limited participation of vulnerable groups in public consultation processes. • Inadequate mechanisms to ensure timely feedback loops between stakeholders and project implementers. • Lack of tailored communication strategies for marginalized groups, such as disabled individuals or non-native speakers. **Gap Filling Measures:** To address these gaps, the project will: 1. **Stakeholder Engagement Plan (SEP):** o Prepare and implement a SEP to guide meaningful consultations and ensure the inclusion of all stakeholder groups, particularly vulnerable populations. o The SEP outlines roles, responsibilities, and a timeline for stakeholder engagement activities. 2. **Inclusive Communication Strategies:** o Use diverse communication channels (e.g., community meetings, printed materials, digital platforms) to ensure information reaches all stakeholder groups. o When necessary, provide project updates in accessible formats (e.g., braille, simplified language) to accommodate varying needs. o ACC will hold public consultation meetings prior and throughout the project lifecycle to inform stakeholders about the project, its potential environmental and social impacts/risks, timeline, and the GM. 3. **Grievance Mechanism (GM):** o Establish a robust GM to address stakeholder concerns promptly and effectively. o Ensure the GM is easily accessible to all stakeholders, including remote and marginalized communities. o The project has its own dedicated GM in addition to the national GMs, with specific procedures for handling SEA/SH (Sexual Exploitation, Abuse, and Sexual Harassment) complaints, ensuring confidentiality and sensitivity in the resolution process. 4. **Capacity Building:** o Train project staff and contractors on best practices for stakeholder engagement and inclusive communication. 5. **Monitoring and Reporting:** o Regularly monitor stakeholder engagement activities and disclose outcomes through semi-annual basis progress reports.

5. POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

5.1. Key Risks of the Project

The overall environmental and social risk rating is assessed as Substantial, with Moderate risks for environmental impacts and Substantial risks for social factors.
The key environmental risks stem from increased agricultural activities, particularly the potential rise in pesticide and fertilizer use, which may lead to soil degradation, water pollution, and biodiversity loss. Furthermore, the expansion of agricultural land may place pressure on local water resources, increasing the risk of water shortages in drought-prone areas. While no major construction works will take place, small infrastructure investments (e.g., drying, sorting, and packaging facilities) could cause temporary environmental impacts such as dust emissions, noise, and waste generation. However, these are expected to be site-specific, temporary, and reversible.

The social risks are Substantial due to potential vulnerabilities among agricultural workers, including limited workplace safety, lack of social protection, and risks of labor rights violations. Additional social risks include labor market imbalances, where informal employment practices may persist despite the project's wage subsidy incentives. Geopolitical and social tensions could also affect worker relations and project implementation.

The project does not support major construction works, land acquisition, or activities affecting biodiversity, cultural heritage, or critical habitats, reducing associated risks. However, project-specific Environmental and Social Management Plans (ESMPs) will be developed to mitigate site-level risks, including waste management, air quality control, and community health and safety measures. While risks are manageable, safeguard measures will be integrated to enhance inclusive participation, formal labor protections, and sustainable agricultural practices.

5.1.1. Potential Environmental Risks and Impacts

The primary environmental risks associated with the project include:

- Soil degradation and erosion due to intensive agricultural practices, deforestation, and poor land-use management.
- Loss of biodiversity and habitat destruction from agricultural expansion and pesticide overuse.
- Water scarcity and pollution risks, including contamination from fertilizers, pesticides, and agrochemical runoff.
- Air pollution and dust emissions from mechanized farming and agro-processing activities.
- Improper waste disposal, particularly hazardous agricultural waste such as pesticide containers.
- Occupational health and safety (OHS) concerns related to pesticide exposure, use of machinery, and lack of protective equipment.
- Climate vulnerabilities, as intensive agriculture may contribute to long-term soil degradation and reduced resilience to extreme weather events.

5.1.2. Potential Social Risks and Impacts

The project also presents significant social risks associated with:

- Informal employment risks, where wage subsidies may not fully prevent continued use of informal labor arrangements.
- Worker vulnerability, particularly among seasonal and migrant laborers who may lack access to social protections and fair wages.

- Exclusion of women and persons with disabilities due to limited accessibility in agricultural employment.
- Child labor and forced labor risks, especially in family-run farms with unregulated hiring practices.
- Delays in wage subsidy disbursements, creating financial strain on farmers and workers.
- Potential social conflicts, particularly if formalization efforts create disparities between worker groups.
- Capacity constraints at ACCs, which may impact project implementation and worker protections.

5.2. Mitigation Measures

The following risk management instruments and specific measures or actions determined to prevent, avoid, minimize, reduce or mitigate the environmental and social risks and impacts of the project over the project cycle:

5.2.1. Environmental Measures

Table 4. Environmental Risks and Measures

Environmental Risks	Mitigation Measures
Soil Erosion	Ploughing across slopes, contour tillage, avoiding excessive soil disturbance, appropriate crop rotation, maintaining vegetative cover.
Soil Degradation & Pollution	Promote integrated pest management (IPM), restrict harmful pesticide use, encourage organic fertilizers, and prevent excessive chemical inputs.
Water Resource Depletion	Introduce efficient irrigation techniques (e.g., drip irrigation, rainwater harvesting), install water meters to control use, avoid excessive water extraction.
Biodiversity & Habitat Loss	Limit land conversion, avoid deforestation, implement buffer zones around sensitive areas, maintain green corridors.
Air Pollution	Enforce dust suppression measures, use low-emission machinery, promote eco-friendly fuels, install air filtration systems.
Waste Generation (Solid & Hazardous)	Implement proper agricultural waste disposal and recycling, separate and store hazardous waste securely, introduce composting initiatives.
Chemical Runoff & Water Contamination	Prohibit pesticide use near water bodies, establish protective vegetation strips along rivers, prevent manure runoff with containment measures.
Infrastructure-related Environmental Risks	Develop site-specific Environmental and Social Management Plans (ESMPs), enforce noise and dust control measures, ensure responsible sourcing of materials.
Climate Change & Resilience	Promote climate-smart agriculture (CSA), integrate agroforestry, encourage drought-resistant crops.
Occupational health and safety (OHS) concerns	Provide protective equipment, mandate safe pesticide handling protocols, and conduct regular safety training.

5.2.2. Social Measures

Table 5. Social Risks and Measures

Social Risks	Mitigation Measures
Informal employment risks	Strengthen monitoring mechanisms to ensure compliance with formal labor contracts.
Worker vulnerability	Establish awareness raising programs for agricultural workers on workplace safety, legal rights, and social protections. Provide onboarding support to ensure workers understand employment terms, access to healthcare, and available grievance mechanisms. Ensure fair wages and social security registration, enforce OHS standards, conduct regular labor inspections.
Child labor and forced labor risks	Enforce zero-tolerance policies, conduct site inspections. Implement grievance mechanism (GM). Implement strict monitoring systems, conduct independent verification, raise awareness among farmers on labor laws.
Potential social conflicts	Organize community engagement sessions to address concerns and foster cooperation. Implement inclusive hiring policies, ensure balanced employment distribution across communities.
Capacity constraints at ACCs	Train ACC staff on labor protections, wage subsidy management, and monitoring. Develop digital tools to streamline administration.
Limited Access to Worker Rights & Grievance Mechanisms	Improve accessibility of GMs, provide training on labor rights and complaint procedures.
Gender Inequality in Employment	Encourage women's participation through targeted recruitment. Ensure non-discriminatory hiring practices
Health & Safety Risks (Exposure to agrochemicals, poor working conditions)	Ensure personal protective equipment (PPE) is provided. Conduct regular safety inspections, offer training on chemical handling.
Community Concerns (Pollution, tensions, displacement risks)	Establish transparent stakeholder engagement processes, hold regular consultations, address environmental concerns proactively.

6. ESMF IMPLEMENTATION ARRANGEMENTS

The project will be implemented by the ACC Central Union (CU). A Project Implementation Unit (PIU) has been established within the ACC CU and will be responsible for the project's management, including overseeing environmental and social risks. The project will also support consultancy services to manage environmental, social, and health and safety-related issues within the project's scope. Additionally, the PIU, consultants, employers, workers, and other stakeholders identified in the Stakeholder Engagement Plan (SEP) will receive training on the Environmental and Social Framework (ESF) provisions and the specific Environmental and Social Standards (ESSs) relevant to the project mentioned in Section 4.

During project implementation, the PIU will provide all stakeholders with information regarding environmental and social procedures, the environmental and social screening process, and the evaluation of micro-scale investment proposals for eligibility based on environmental and social criteria. The PIU will also coordinate with relevant authorities on environmental and social matters, manage complaints and feedback from stakeholders through the project GM, monitor the environmental impacts of project activities, report on environmental and social impacts arising during implementation, and assess the effectiveness of mitigation measures.

The ACC, through its PIU, is responsible for ensuring the project's compliance with environmental and social requirements and for implementing the project's environmental and social instruments, namely the ESMF, LMP and SEP. The environmental and social risk management procedures will be implemented through the Project's subproject selection process.

6.1. Selection of Working Sites and Grant Proposals

Component 1 - Wage subsidies and support for formalization of jobs: reaching to farmers and potential beneficiaries will be performed under this component. The ACC and PIU will inform farmers about the objectives and benefits of the project. The environmental aspects to be considered in relation to Component 1 activities include addressing incremental environmental impacts which might be caused by existing agricultural practices (crop production), and ensuring that occupational health and safety (OHS) conditions of the workers employed formally, and supported through the wage subsidies, are in line with national regulations and World Bank Environmental Health and Safety Guidelines (ESHG) and Good International Industry Practices (GIIP).

Component 2 - Enhancement of ACC's aggregation capacity: The component will award micro or small grants for projects proposed by primary ACCs that will improve their aggregation capacity for those crops that are subject to contract farming under Component 1. Environmental and social aspects associated with the expansion of such secondary production will be evaluated by PIU before approval of the grants and respective ES instrument will be developed by PIU, if/as appropriate.

6.2. Screening of Activities for Environmental and Social Risks and Impacts

6.2.1. List of Non-Eligible Activities

As an initial step, all proposed activities will be screened to ensure that they fall within the scope of the Project's eligible activities and are not included in the E&S Exclusion List outlined in the table below. For the eligible activities under Component-1, no further E&S assessment will be required.

Table 6. Exclusion List

1.	Weapons, including but not limited to mines, guns, ammunition, and explosives
2.	Support of production of any hazardous good, including alcohol, tobacco, and controlled substances
3.	Any construction in protected areas or priority areas for biodiversity conservation, as defined in national law

4.	Activities that have the potential to cause any significant loss or degradation of critical natural habitats, whether directly or indirectly, or which would lead to adverse impacts on natural habitats
5.	Activities that involve extensive harvest and sale/trade of forest resources (post, timber, bamboo, charcoal, wildlife, etc.) for large-scale commercial purposes
6.	Activities involving changing forestland into agricultural land or logging activities in primary forest
7.	Purchase or use of banned/restricted pesticides, insecticides, herbicides, and other dangerous chemicals (banned under national law and World Health Organization (WHO) category 1A and 1B pesticides)
8.	Construction of any new dams or rehabilitation of existing dams including structural and or operational changes; or irrigation or water supply subprojects that will depend on the storage and operation of an existing dam, or a dam under construction for the supply of water
9.	Activities that may cause or lead to forced labor or child abuse, child labor exploitation or human trafficking, or subprojects that employ or engage children, over the minimum age of 14 and under the age of 18, in connection with the project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral, or social development
10.	Any activity on land that has disputed ownership or tenure rights
11.	Any activity that will cause physical relocation of households or will require the use of eminent domain
12.	Any activity having substantial or high environmental risks or high social risks according to ESS1.
13.	Any projects with significant adverse impacts on protected areas or known sites of critical natural habitats
14.	Any activities with significant adverse impacts on cultural heritage
15.	Activities which would cause restrictions on land use, land acquisition and/or involuntary resettlement.
16.	Any activity triggering OP7.50 International Waterways

6.2.2. Environmental and Social Screening Procedures

As a second step, the PIU will use the E&S Screening Form (ANNEX 2 of this ESMF) to identify and assess relevant environmental and social risks specific to each subproject activity under Component 2. This form will systematically evaluate potential risks, such as environmental (e.g., waste management) and social (e.g., community disruptions) impacts/risks and occupational safety concerns. The form will also guide the identification of the appropriate E&S mitigation measures required specific to the activities. The E&S Screening Form will help to determine if relevant plans (site-specific ESMP, Chance Find Procedures, Integrated Pest Management Plan, etc.) to be prepared and implemented for each subproject. PIU will also identify the documentation, permits, and clearances required under the government's relevant national legislation.

Table 7 below summarizes the procedures to be followed throughout the project cycle.

Table 7. Project Cycle and E&S Management Procedures

Project Stage	E&S Stage	E&S Management Procedures
a. Assessment and Analysis: *Subproject identification*	Screening	• During subproject identification, ensure subproject eligibility by referring to the Exclusion List in Table 6. • **For Component 2 activities**, use the E&S Screening Form (ANNEX 2of this ESMF) to identify potential environmental and social risks, impacts, and mitigation measures and E&S risk rating of the subproject. • Identify required documentation, permits, and clearances under national regulations. • Submit the completed Screening Forms for all sub-projects to the WB for review and approval.
b. Formulation and	Planning	• Prepare site-specific ESMPs based on screening results when

Planning: *Planning for subproject activities, including human and budgetary resources and monitoring measures*		needed • Submit ***at least the first five site specific ESMPs*** to the WB for ***review and clearance.*** • **Disclose site-specific ESMPs** to stakeholders, consult with stakeholders (including affected communities) in accordance with the SEP, and ensure accessibility of information. • Complete all required permits, clearances, and documentation in line with national legislation. • Provide training to ACC staff and beneficiaries on implementation and monitoring of E&S requirements • Include site-specific ESMPs in beneficiary agreements and procurement/bidding documents
c. Implementation and Monitoring: *Implementation support and continuous monitoring for projects*	Implementation	• Monitor implementation of site-specific ESMPs through regular site visits, regular reporting from the field and other planned monitoring activities/tools. • Track grievances/beneficiary feedback. • Conduct awareness-raising sessions and ongoing training for staff, contractors, and communities. • Prepare semi-annual E&S Progress Report and share with the WB.

6.2.3. Preparation of Sub-project Specific E&S Documents

Based on the E&S Screening Checklist, if a site-specific ESMP is required, the PIU will customize the project-level ESMP (ANNEX 3) and relevant E&S sub-management plans to address site-specific needs. The draft ESMPs will be disclosed on the project's webpage at least seven (7) before being consulted upon with the stakeholders, including the affected communities. The consultation will cover the environmental and social risks and impacts of the proposed subproject, the mitigation measures to be taken, the roles and responsibilities of different parties, and will also provide an opportunity to receive feedback from participants on the proposed subproject.

At least the first five draft site-specific ESMPs will be submitted to the World Bank for prior review and no objection before their disclosure for consultation purposes. After these first five ESMPs, the World Bank and the PIU will reassess whether prior review is required for subsequent ESMPs or for specific categories of ESMPs (e.g., activities exceeding a certain budget or specific types of activities). The PIU will also complete the documentation, permits and clearances required under the government's Environmental Regulation before any project activities begin.

Prior to commencement of any civil works and implementation, staff who will be working on the various subproject activities should be trained in the environmental and social management plans relevant to the activities they work on. The PIU should provide such training to field staff. The PIU should also ensure that all selected contractors, subcontractors, and vendors understand and incorporate environmental and social mitigation measures relevant to them as standard operating procedures for civil works. The PIU should provide training to awarded contractors to ensure that they understand and incorporate environmental and social mitigation measures; and plan for cascading training to be delivered by contractors to subcontractors and vendors.

The PIU should further ensure that the entities or communities responsible for ongoing operation and maintenance of the investment have received training on operations stage environmental and social management measures as applicable.

6.2.4. ESMP Implementation

During implementation, the ***PIU will conduct regular monitoring visits on quarterly basis*** while ***field consultancy will conduct monthly monitoring visits***. If there are contractors implementing subproject

activities, the contractors will be responsible for implementing the mitigation measures in the E&S risk management documents, with PIU oversight. The PIU working to implement the project will ensure that monitoring practices include the environmental and social risks identified in the ESMF and will monitor the implementation of E&S managemet plans as part of regular project monitoring.

Throughout the Project implementation stage, the PIU will continue to provide training and awareness raising to relevant stakeholders, such as staff, awarded contractors, and communities, to support the implementation of the environmental and social risk management mitigation measures. The PIU will also track grievances and beneficiary feedback (in line with the SEP) during project implementation as a monitoring tool for the implementation of project activities and environmental and social mitigation measures.

6.3. Environmental and Social Monitoring and Reporting

6.3.1. Monitoring and Reporting Responsibilities

The environmental and social performance of the project activities will be regularly monitored, documented and reported. In the case of instrumental monitoring data, the original records of the results of the required instrumental environmental monitoring (air, water and soil quality) shall also be presented in a separate file for records. Relavant PIU specialists will undertake regular monitoring visits to the project sites.
As part of environmental and social monitoring, the ACC and/or its 210
/local representatives or consultants conduct random inspections of project sites to determine the effectiveness of measures taken to satisfy the required environmental and social standards.
The environmental and social specialists will be responsible for E&S reporting and will:

- Record and maintain the results of project supervision and monitoring throughout the life of the project
- Prepare semi-annual E&S progress reports to present the implementation status of the ESMF and site-specific ESMPs.
    - At a minimum, the reporting will include;
        (i) the overall implementation of E&S risk management instruments and measures,
        (ii) any environmental or social issues arising as a result of project activities and how these issues will be remedied or mitigated, including timelines,
        (iii) Occupational Health and Safety performance (including incidents and accidents), community health and safety,
        (iv) stakeholder engagement updates, in line with the SEP,
        (v) public notification and communications,
        (vi) progress on the implementation and completion of project works,
        (vii) summary of grievances/beneficiary feedback received, actions taken, and complaints closed out, in line with the SEP.
- Notify the WB no later than 48 hours after learning of the incident or accident. Provide available details upon request. Provide review report and Corrective Action Plan (CAP) to the WB no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the WB.
- Specify in the contract farming contracts and agreement on sub-projects that prompt notification of E&S accidents and incidents and ensure that an incident register is kept by the Regional Offices of the ACC throughout the Project life.

6.4. Roles and Responsibilities for ESMF Implementation

Below Table 10 describes the institutional arrangements for the ESMF aspects of the full project management and implementation.

Table 8. Roles and Responsibilities

Responsible Party	Roles and Responsibilities
PIU	• Hire/appoint one environmental and one social to ensure the effective management and monitoring of environmental, social, and OHS risks in compliance with project requirements. • Through its environmental and social specialists; - Prepare ESMF, SEP, LMP and submit for Bank WB approval - Disclose the ESMF, SEP, LMP on ACC and/or project website - Undertake E&S screening of project activities as per the screening criteria - Prepare site-specific ESMPs according to E&S screening results when needed - Disclose, consult upon the site-specific ESMPs on the project webpage of PIU and incorporate site-specific ESMPs into the agreement with beneficiaries and procurement documents - Ensure that the Contractor ESMP (C-ESMP), along with other relevant sub-management plans, is prepared, reviewed, and cleared by the PIU prior to the commencement of any civil works on the ground - Assign field specialists for the environmental and social monitoring. - Monitor implementation of the ESMF, SEP and LMP. - Monitor the implementation of site-specific ESMPs, make recommendations and decide whether additional measures are needed. - In case of non-compliance, ensure that the agreement with beneficiaries and procurement eliminates the noncompliance and inform the WB about the noncompliance and follow up. - Conduct consultation meetings; and prepare and distribute leaflets or other project related informative documents to inform communities. - Maintain the existing GM, monitor and address grievances related to the project under specified timelines. - Report on the environmental and social performance of the project to WB in regular semi-annual E&S progress reports. - Coordinate and liaise with WB supervision missions regarding environmental and social aspects of project implementation. • Notify the WB no later than 48 hours after learning of the incident or accident. Provide available details upon request. Provide review report and Corrective Action Plan (CAP) to the WB no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the WB.
Field Officers	• Implement the GM; communicate grievances to PIU monthly through monitoring reports. • Monitor site activities on a monthly basis to ensure E&S compliance

	• Report to the PIU on the E&S performance of the sub-project on a quarterly basis.
Primary ACCs	• Implement E&S requirements according to ESMF, SEP, LMP, site-specific ESMPs and national legislation on project sites • Monitor site activities and report on the E&S performance to PIU (field officers) • Report on a quarterly basis on the ESMP implementation progress • Notify the PIU field officers and/or PIU immediately for any serious E&S incidents immediately.
Contractors	• Prior to commencement of any civil works prepare C-ESMP, LMP and relevant E&S sub-management plans and submit these documents to the PIU for their review and approval. • Maintain environmental, social, OHS focal points with relevant certification and/or experience in charge of E&S management • Ensure implementation of and compliance with the Project's environmental and social mitigation measures as outlined in the C-ESMP, LM Plan and relevant E&S sub-management plans, and contract documents, and ensure adherence to national and local legislation. • Address construction-related grievances as per the GM procedure described in the Project SEP and escalate unresolved issues to PIU immediately. • Notify PIU and field officers through of any serious E&S incidents immediately. • Monitor site activities on daily basis and report on the E&S performance to PIU and field officers on monthly basis.

7. STAKEHOLDER ENGAGEMENT, DISCLOSURE AND CONSULTATIONS

The FESAS-2 Project recognizes the rights of the local communities and key stakeholders in the project. During the life of the Project, stakeholder engagement will be free of manipulation, interference, and intimidation, and conducted on the basis of timely, relevant, understandable and accessible information, in a culturally appropriate format. It involves interactions between identified groups of people and provides stakeholders with an opportunity to raise their concerns and opinions and ensure that this information is taken into consideration when making project decisions.

Within the scope of the Project, stakeholder engagement activities will be initiated as early as possible and will be carried out throughout the Project and this ESMF will be updated accordingly to include and effectively address the outcomes of the consultations into the Project design (Project's preparation and implementation).

Notification for the date/time, venue and purpose of the consultation meeting to be held with the participation of ministries and representatives of public institutions was sent to the relevant institutions with an e-mail dated 04.02.2025. Separate consultation meetings took place between February 7-13, 2025 due to stakeholders' varying schedules and areas of focus, either through in-person visits or online sessions. The updated version of the document was disclosed on the official website of ACC in March 2026. A consultation meeting was first held with the Agriculture and Rural Development Support Institution (TKDK) on February 7, 2025, at their headquarters. This was followed by an online meeting with Turkish Employment Agency (İŞKUR) on February 10, 2025, attended by institutional representatives. On February 12, 2025, a consultation meeting was held with the Directorate of Migration Management (DMM) at their offices.

Consultation meetings were moderated by Environmental and Social Consultants, with the participation of 8 people (4 women and 4 men). The participants were then briefed about the World Bank's Environmental and Social Standards, Project's Environmental and Social Assessment documents, benefits of the project, potential environmental and social impacts and risks of the Project and mitigation measures, environmental and social management of the Project, stakeholder engagement processes, grievance mechanism and labor management procedures. Participants had no objections to the Project and related management procedures.

For further details on the consultations, including invitation e-mail, consultation presentation, participant feedback and discussion points, please visit Section 4.1 and Annexes 1 and 2 of the SEP which is disclosed in the ACC website (see footnote 2).

Participant information is recorded by the PIU however, participant information will not be disclosed and published within the scope of the Personal Data Protection Law.

The ESMF, SEP and LMP will also be disclosed on the World Bank's external webpage, following the project Appraisal.

8. GRIEVANCE MECHANISM

The FESAS-II Grievance Mechanism (GM) is designed to ensure that complaints and grievances are resolved in a timely, effective, and transparent manner, strengthening accountability to project stakeholders. It provides all stakeholders, including the public, with accessible channels to submit feedback or concerns related to project activities.

The GM operates in Turkish, English, and Arabic to eliminate language barriers, and anonymous submissions are permitted, with privacy protections in place throughout the project. A dedicated department is responsible for receiving, recording, and addressing grievances while ensuring principles of transparency, non-discrimination, and confidentiality.

Project stakeholders will be informed about the GM and resolution procedures through various communication methods, including notice boards, suggestion/complaint boxes, training sessions, meetings, the project website, printed materials, and social media.

8.1. GM Procedures

The GM Procedures follows a structured approach to ensure effective and timely resolution of grievances. Stakeholders can submit grievances through various intake channels (see Table 9). Anonymous grievances are also accepted and processed under the same procedure. To ensure accessibility, transparency, and ease of use for all stakeholders, further details on grievance procedures, roles and responsibilities, and escalation mechanisms, have been disclosed on the project website[3].

In case a grievance remains unresolved at the initial level, it can be escalated to higher authorities or an independent appeals body for further review (see Section 8.2).

This structured GM procedure ensures that grievances are handled fairly, efficiently, and transparently, enhancing stakeholder confidence in the project's commitment to social and environmental accountability.

8.1.1. Intake Channels

Table 9. GM Intake Channels

FESAS Hotline	Hotline will be arranged by the GM firm.
E-mail	iletisim@fesas.org
Website	https://www.fesas.org/iletisim/
Social Media Accounts	https://www.instagram.com/fesasprojesi/ https://www.linkedin.com/company/fesas-projesi/ https://twitter.com/FesasP https://www.facebook.com/FesasProjesi/
Suggestion Boxes	Will be placed in Primary Cooperatives in project provinces
ACC Hotline	444 4 855
CIMER	www.cimer.gov.tr 150 +90 312 525 55 55
YIMER	www.yimer.gov.tr 157 +90 312 157 11 22

[3] https://www.fesas.org/download/sikayet-mekanizmasi-proseduru/

8.2. Appeal Mechanism

If the grievance cannot be resolved despite all the efforts made and actions taken, the GM focal point of PIU will notify the complainant about the resolution by summarizing the corrective actions taken and explaining the resolution process of the complaint and informing the complainant of other alternatives. At all times, complainants may seek other legal remedies in accordance with the Turkish legal framework.

Applicants whose complaints could not be resolved through existing GM or whose complaints contain sensitive issues can always apply to the relevant legal institutions. Such institutions can be summarized as follow:

- CIMER
- YIMER
- Civil Courts of First Instance
- Administrative Court
- Commercial Courts of First Instance
- Labor Courts
- Ombudsman

8.3. World Bank Grievance Redress Service

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

ANNEX 1. NATIONAL ENVIRONMENTAL AND LABOR LEGISLATION AND INTERNATIONAL AGREEMENTS AND CONVENTIONS APPLICABLE TO THE PROJECT ACTIVITIES

The national legal framework of Turkiye provides comprehensive guidance for managing environmental and social risks and impacts associated with project activities under FESAS-II. Relevant laws, policies, and regulations are summarized in Table 10. Turkiye's national approach to environmental protection, cultural heritage conservation, and biological resource management has been shaped by both domestic legislation and international agreements ratified by Turkiye. Relevant environmental, OHS, and international labor agreements and conventions ratified by Turkiye are listed in Table 11 and Table 12.

Table 11

Table 12.

Table 10. Relevant Legal Framework of Turkiye

Law /Regulation	Description and Relevance to Project Activities
Environmental Law (Law No. 2872)	Establishes principles for environmental protection and pollution prevention, directly applicable to all subproject activities.
Conservation of Cultural and Natural Assets Law (Law No. 2863)	Governs the preservation of cultural heritage and archaeological sites, applicable for subprojects in areas with cultural significance.
Energy Efficiency Law (Law No. 5627)	Promotes energy efficiency measures, applicable for retrofitting and construction projects.
Law on Agriculture (Law No. 5488)	Determines the policies and arrangements for the development and support of the agricultural sector and rural area in line with the development plans and strategies.
Agricultural Reform Law on Land Regulation in Irrigation Areas (Law No. 3083)	Sets principles for efficient cultivation of land, increasing agricultural production continuously, evaluating and creating employment opportunity, supporting farmers to enable them to have and handle agricultural activity and protecting the territorial integrity
Forestry Law (Law No. 6831)	Protects forest resources and biodiversity, applicable to projects near forested areas.
Groundwater Law (Law No. 167)	Regulates the protection and use of groundwater resources, relevant for site-specific considerations.
Labor Law (Law No. 4857)	Protects workers' rights, prohibits discrimination, and ensures fair labor practices for project-employed personnel.
Occupational Health and Safety (OHS) Law (Law No. 6331)	Regulates workplace safety and health standards, ensuring worker protection during construction and retrofitting activities.
Law on Soil Protection and Land Use (Law No. 5403)	Provides measures for soil conservation and land management, applicable for construction activities.
Expropriation Law (Law No. 2942)	Outlines procedures for land acquisition, applicable for subprojects requiring land use.
Zero Waste Regulation (Official Gazette No. 30829)	Sets principles for waste segregation and recycling, aligning with sustainable development goals.
Regulation on Good Farming Practices (Official Gazette No. 27778)	Regulates the principles and procedures of good agricultural practices to be carried out in order to make an agricultural production that does not harm the environment, human and animal health, to protect natural resources, to ensure traceability and sustainability in agriculture and to supply reliable products.
Public Health Law (Law No.	Public Health Law (Law No. 1593)

1593)	
Law on Relieves and Measures to be Taken Against Disasters (Law No. 7269)	Law on Relieves and Measures to be Taken Against Disasters (Law No. 7269)
Regulation on the Protection of Monumental Trees (Law No. 28358)	Protects historically, culturally, or naturally significant trees; critical for safeguarding such trees during project activities.
Medical Waste Management Regulation (Law No. 29959)	Sets guidelines for handling, storing, and disposing of medical waste; relevant for hospital-related projects.
Regulation on Maximum Residue Limits of Turkish Food Codex Pesticides (Law No. 31611)	Defines procedures and principles to preserve human health by defining and controlling maximum residual limits found in plant and animal-based foods.
Regulation on Health and Safety Conditions in the Use of Work Equipment (Law No. 28628)	Ensures the use of appropriate protective equipment and safety measures on construction sites.
Exhaust Emission Control Regulation (Law No. 27190)	Requires vehicles and machinery used in construction to comply with emission standards.
Law on the Work Permit for Foreigners (Law No. 4817)	Regulates the procedures and principles related with defining political issues and rules about international workforce and work permit rules
Law on the Protection of Personal Data (Law No. 6698)	Ensures the legal processing, storage, and protection of personal data. Relevant to stakeholder engagement, grievance mechanisms, and management of personal information.
Law on Protection of Family and Prevention of Violence Against Women (Law No. 6284)	Aims to protect women from domestic violence, promote gender equality, and ensure the safety of vulnerable individuals. Relevant for stakeholder engagement and community health and safety measures.
Turkish Civil Code (Law No. 4721)	Governs family law, including marriage, divorce, inheritance, and property rights, ensuring equality between men and women. Relevant for addressing family-related social issues in project-affected areas.
Planned Areas Development Regulations (Law No. 30113)	Regulation set forth comprehensive guidelines for urban development, ensuring that construction activities adhere to zoning plans, environmental sustainability, and community needs, while maintaining compliance with national building codes and safety standards.

Table 11: International Agreements and Conventions

Law /Regulation	Description and Relevance to Project Activities
Basel Convention on the Control of Transboundary Movements of Hazardous Wastes (1994)	Ensures safe handling and disposal of hazardous materials during project activities.
Bern Convention on the Conservation of European Wildlife (1999)	Promotes biodiversity conservation, relevant for subprojects near natural habitats.
Ramsar Convention on Wetlands (1994)	Protects wetlands of international importance, applicable to nearby sensitive ecosystems.
Montreal Protocol on Substances that Deplete the Ozone Layer (1991)	Regulates harmful emissions, relevant for retrofitting activities.
Paris Agreement (Ratified 2021)	Encourages greenhouse gas reduction and renewable energy use in infrastructure projects.
ILO Occupational Safety and Health Convention (2015)	Sets standards for worker safety and health, applicable for labor-intensive activities.

Stockholm Convention on Persistent Organic Pollutants (2009)	Prohibits the use of hazardous chemicals, ensuring compliance in project activities.
Vienna Convention for the Protection of the Ozone Layer	Requires mitigation of ozone-depleting activities during project implementation.
European Convention on the Protection of the Archaeological Heritage	Governs preservation of archaeological sites, applicable to projects in culturally sensitive areas.
UN Convention on Biological Diversity	Promotes biodiversity conservation and sustainable management in project design and implementation.
Convention on Long-range Transboundary Air Pollution (1983)	Aims to reduce and prevent transboundary air pollution, relevant for industrial activities with potential cross-border environmental impacts.
Convention on International Trade in Endangered Species of Wild Flora and Fauna (CITES, 1996)	Regulates the trade of endangered species, relevant for projects near sensitive ecosystems or involving biodiversity conservation.
United Nations Convention to Combat Desertification (1998)	Addresses land degradation and desertification, applicable to projects involving large-scale land use or reclamation.
Geneva Convention on Long-Range Transboundary Air Pollution (1983)	Aims to reduce and prevent transboundary air pollution impacts, relevant for managing construction emissions.
UN International Convention for the Protection of Birds (1966)	Protects bird species and their habitats, applicable for projects near sensitive ecological areas.
Barcelona Convention on the Protection of the Marine Environment and the Coastal Region of the Mediterranean (1976)	Ensures protection of marine environments and coasts, relevant for activities near marine zones.
Izmir Protocol on Hazardous Wastes (2003)	Regulates the transboundary movement of hazardous wastes in the Mediterranean region, relevant for hazardous waste management during project activities.
Floransa Convention – European Landscape Convention (2003)	Promotes landscape conservation and management, relevant for projects impacting scenic or cultural landscapes.
Stockholm Convention on Persistent Organic Pollutants (2010)	Prohibits the use of harmful chemicals, ensuring compliance during hazardous material management.

Table 12: EU-Aligned Environmental and Safety Legislation

Law /Regulation	Description and Relevance to Project Activities
Regulation Concerning Follow-up of Greenhouse Gas Emissions	Monitors emissions to align with international climate goals, applicable for energy-efficient retrofitting.
Environmental Auditing Regulation	Ensures compliance with environmental standards through periodic audits, relevant for monitoring during construction.
Regulation on Environmental Impact Assessment (EIA)	Requires assessment for projects with potential environmental impacts, ensuring mitigation measures for high-risk activities.
Regulation for the Preparation of Spatial Plans	Guides land use planning, relevant for project site selection and urban development.
Regulation on Waste Management	Governs waste segregation, recycling, and disposal, applicable for demolition and construction waste.
Regulation on Water Pollution Control	Protects water resources from contamination, applicable to wastewater management during construction.
Regulation on the Control of End-of-Life Vehicles	Promotes recycling and safe disposal of vehicles, relevant for transport and logistics in the project.
European Landscape Convention (2006)	Promotes the conservation and management of landscapes, relevant to projects impacting scenic or ecological areas.

ANNEX 2. ENVIRONMENTAL AND SOCIAL SCREENING CHECKLIST

The E&S Screening procedure comprises of two stages-process: (i) initial screening by using the **Exclusion List** in Table 7 of the ESMF; and (ii) screening the proposed activities to identify the approach for E&S risk management. This Screening Form is the second stage of screening process and is to be used for all subproject activities. The completed forms will be signed and kept in the records of the PIU.

1. Subproject Information:

Subproject Title	
Subproject Location	
Regional Unit in Charge	
Estimated Cost	
Start/Completion Date	
Brief Description of Subproject	

2. Environmental and Social Screening Questionnaires

	Questions	Answer		Next Steps
		Yes	No	
ESS1				
1	Is the subproject likely to have significant adverse environmental impacts that are sensitive and unprecedented that trigger the 'Ineligible Activities' or other exclusion criteria?			If "Yes": Exclude from project.
2	Does the subproject involve new construction or renovation or rehabilitation of any existing facility?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Include E&S risk management measures in bidding documents.
ESS2				
3	Does the subproject involve uses of goods and equipment involving forced labor, child labor, or other harmful or exploitative forms of labor?			If "Yes": Exclude from project.
4	Does the subproject involve recruitment of workforce including direct, contracted, primary supply?			If "Yes": Apply LMP
5	Will the workers be exposed to workplace hazards that needs to be managed in accordance with local regulations and World Bank Group (WBG) Environmental, Health and Safety Guidelines (EHSGs)? Do workers need Personal Protection Equipment (PPE) relative to the potential risks and hazards associated with their work?			If "Yes": Apply LMP
6	Is there a risk that women may be underpaid when compared to men when working on the project construction?			If "Yes": Apply LMP
7	Is the project expected to have any OHS related risks and impacts?			If "Yes": Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3.

ESS3				
8	Is the project likely to generate solid or liquid waste that could adversely impact soils, vegetation, rivers, streams or groundwater, or nearby communities?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the Annex 3. 2. Include E&S risk management measures in bidding documents.
9	Will the activities require use of significant amount of pesticide?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Annex 3. 2. Prepare Integrated Pest Management Plan based on the template in Annex 5.
10	Do any of the construction works involve the removal of asbestos or other hazardous materials?			If "Yes": Exclude from project.
11	Are works likely to cause significant negative impacts to air and / or water quality?			If "Yes": Exclude from project.
12	Does the activity rely on existing infrastructure (such as discharge points) that is inadequate to prevent environmental impacts?			If "Yes": Exclude from project.
ESS4				
13	Is there a risk of increased community exposure to communicable disease (such as infectious disease outbreaks, HIV/AIDS, Malaria), or increase in the risk of traffic related accidents?			If "Yes": Apply LMP and relevant measures in SEP.
14	Is an influx of workers, from outside the community, expected? Would workers be expected to use health services of the community? Would they create pressures on existing community services (water, electricity, health, recreation, others?)			If "Yes": Apply LMP
15	Is there a risk that SEA/SH may increase as a result of project works?			If "Yes": Apply LMP
16	Would any public facilities, such as schools, health clinic, mosque/church be negatively affected by construction?			If "Yes": Prepare a site-specific ESMP for the proposed subproject, based on the template 3.
17	Will the subproject require the government to retain workers to provide security to safeguard the subproject?			If "Yes": Prepare a site-specific ESMP for the proposed subproject, based on the template 3.
ESS5				
18	Does the sub-project involve involuntary land acquisition?			If "Yes": Exclude from project.
19	Does the sub-project involve physical and/or economic displacement of people?			If "Yes": Exclude from project.
20	Is private land required for the sub-project activity being voluntarily donated to the sub-project?			If "Yes": Exclude from project.
21	Is there any possibility to move out, or close of business/commercial/livelihood activities of persons during construction *(are there any formal/informal users or non-titled people who are utilizing/inhabiting/doing business or using for other purposes etc.)* the proposed site/project			If "Yes": Exclude from project.

	locations that will be used for civil work? If yes, please provide how many and for what purposes)?			
22	Will there be any expropriation under the sub-project?			If "Yes": Exclude from project.
ESS6				
23	Does the subproject involve activities that have potential to cause any significant loss or degradation of critical habitats[4] whether directly or indirectly, or which would lead to adverse impacts on natural habitats[5]?			If "Yes": Exclude from project.
24	Will the project involve the conversion or degradation of non-critical natural habitats?			If "Yes": 1. Prepare a site-specific ESMP for the proposed subproject, based on the template in Include E&S risk management measures in bidding documents.
25	Will this activity require clearance of natural forests?			If "Yes": Exclude from project.
26	Will there be any significant impact on any ecosystems of importance (especially those supporting rare, threatened or endangered species of flora and fauna)?			If "Yes": Exclude from project.
ESS8				
27	Is the subproject to be located adjacent to a sensitive site (historical or archaeological or culturally significant site) or facility?			If "Yes": Apply Chance Find Procedures in Annex 4.
28	Is the subproject locate near buildings, sacred trees or objects having spiritual values to local communities (e.g. memorials, graves or stones) or require excavation near there?			If "Yes": Apply Chance Find Procedures in Annex 4.

3. Conclusion

Based on the result from the screening above, please write the E&S risk rating and list the E&S risk management instruments to be prepared/adopted and implemented:

a)
b)

Name and title of person who conducted screening:
Date of screening:

[4] Environmental and Social Standard 6, paragraph 23: "Critical habitat is defined as areas with high biodiversity importance or value, including (a) Habitat of significant importance to Critically Endangered or Endangered species, as listed in the IUCN Red List of threatened species or equivalent national approaches; (b) Habitat of significant importance to endemic or restricted-range species; (c) Habitat supporting globally or nationally significant concentrations of migratory or congregator species; (d) Highly threatened or unique ecosystems; and (e) Ecological functions or characteristics that are needed to maintain the viability of the biodiversity values described above in (a) to (d)."

[5] Environmental and Social Standard 6, paragraph 21: "Natural habitats are areas composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified an area's primary ecological functions and species composition."

ANNEX 3. SITE SPECIFIC ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN (TEMPLATE)

PART 1: General Project and Site Information

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

PART 2: Mitigation Measures

ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
0. General Conditions	Design/Planning Considerations Notification Worker Safety Community Health and Safety Resource Efficiency	(a) The local construction and environment related authorities and communities have been notified of upcoming activities (b) The public has been notified of the works, including the communicable diseases measures taken on sites, through appropriate notification in the media and/or at publicly accessible sites (including the site of the works) (c) All legally required permits have been acquired for construction and/or renovation (d) All activities will be implemented in line with both Law on Occupational Health and Safety (Law No. 6331) and its relevant regulations and also with the World Bank Group's OHS Guidelines (e) The Contractor formally agrees that all work will be carried out in a safe and disciplined manner, and is designed to minimize risks on neighboring residents and environment (f) The Contractor will ensure a safe working environment for the workers and supply appropriate personal protective equipment (PPE) in line with international best practice and Turkish Legislation including the health and safety measures related to communicable diseases provided by the Ministry of Health and Ministry of Labor and Social Security (always hardhats, as needed masks and safety glasses, harnesses and safety boots, etc.) (g) The Contractor will assign personnel with relevant certification and experience in charge of occupational health and safety (h) Before the construction works start, a Risk Assessment study will be implemented for all works to be carried out. Relevant procedures and plans (including "Emergency Plans") will be put in place. Both the Risk assessment and Emergency Response Plans will take into consider the communicable diseases risks and other communicable disease risks, as relevant. (i) Appropriate signposting of the sites will be provided and then workers will be informed of key rules and regulations to follow (j) Occupational Health and Safety (OHS) trainings and toolbox talks will be provided to the employees indicating the possible risks regarding the work site and works to be carried out. These will include regular trainings to workers on communicable diseases symptoms, how to be protected and what to do when symptoms appear. (k) Both trainings and incidents (fatalities, lost time incidents, any significant events including spills, fire, outbreak of pandemic or communicable diseases, social unrest etc.) will be recorded (l) The contractor notifies DAs in 3 business days in case of any significant event occurs. DAs will notify the World Bank about any significant incident (accidents, spills, fatalities, etc.) within 3 business days, and will send an incident investigation report together with the corrective action plan in 30 business days to the World Bank (m) Subgrant recipient will apply the concept of universal access[6] to the design and construction of new and renovation of existing structures (n) If construction or renovation works are carried out in operational public buildings and access to these building are directed to other entrances of the buildings thereof, then necessary structures will be formed/constructed/installed considering universal access practices. (o) If construction or renovation works are related with public access buildings (such as childcare facilities, etc.), it will be designed to prevent

[6] Universal access means unimpeded access for people of all ages and abilities in different situations and under various circumstances.

ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
		the start of fires through the implementation of national legislation (Regulation on the Protection of Buildings from Fire, Official Gazette No: 31665, dated November 20, 2021) and the internationally accepted life and fire safety standards. (p) Subgrant recipient and the Contractor will implement technically and financially feasible measures for improving efficient consumption of energy water and raw materials, as well as other sources (q) Structures (e.g. child care facilities or maker spaces) will be checked for seismic resilience, as appropriate. Provisions of "Regulations for the Structures to be Built in Disaster Areas" published in the Official Gazette No. 30364 dated 18.03.2018 and "Turkey Building Code" of Disaster and Emergency Management Administration published in the Official Gazette No30364 dated 18.03.2018 that came into force in 01.01.2019 will be strictly followed.
A. General Rehabilitation and /or Construction Activities	Air Quality	(a) In case demolition, debris-chutes shall be used above the first floor, and demolition debris shall be kept in controlled area and sprayed with water mist to reduce debris dust (b) In case pneumatic drilling during excavation dust shall be suppressed by ongoing water spraying and/or installing dust screen enclosures at site (c) The surrounding environment (sidewalks, roads) shall be kept free of debris to minimize dust (d) There will be no open burning of construction / waste material at the site (e) There will be no excessive idling of construction vehicles at sites
	Noise	(a) Noise during renovation and/or construction will be limited to restricted times İdentified in the relevant legislation (b) During operations the engine covers of generators, air compressors and other powered mechanical equipment shall be closed, and equipment placed as far away from residential areas as possible
	Water Quality	(a) The site will establish appropriate erosion and sediment control measures such as e.g., hay bales and / or silt fences to prevent sediment from moving off site and causing excessive turbidity in nearby water runoffs
	Waste management	(a) Waste collection and disposal pathways and sites will be identified for all major waste types expected from all activities (b) Solid waste will be collected and disposed properly in accordance with environmental legislation (c) The records of waste disposal will be maintained as proof for proper management as designed (d) Whenever feasible the contractor will reuse and recycle appropriate and viable materials (e) Personal hygiene material/equipment wastes (such as single use masks, gloves) will be collected, temporary stored, transported and delivered to waste processing facilities in accordance with the Circular 2020/12 of MoEU on communicable diseases Measures in the Management of Personal Hygiene Equipment Wastes.
	Labor issues and Labor Management (Workers coming from infected areas, Co-workers becoming infected,	(a) Consider ways to minimize/control movement in and out of construction/refurbishment site. (b) If workers are accommodated on site require them to minimize contact with people outside the construction/refurbishment site or prohibit them from leaving the site for the duration of their contract. (c) Implement procedures to confirm workers are fit for work before they start work, paying special to workers with underlying health issues or who may be otherwise at risk.

ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
	Workers introducing infection into community / general public)	(d) Check and record temperatures of workers and other people entering the site or require self-reporting prior to or on entering. (e) Provide daily briefings to workers prior to commencing work, focusing on communicable diseases specific considerations including cough etiquette, hand hygiene and distancing measures. (f) Require workers to self-monitor for possible symptoms (fever, cough) and to report to their supervisor if they have symptoms or are feeling unwell. (g) Prevent a worker from an affected area or who has been in contact with an infected person from entering the site for 14 days. (h) Preventing a sick worker from entering the site, referring them to local health facilities if necessary or requiring them to isolate at home for 14 days. (i) prepare code of conduct that will be shared with project workers during employment. (f) Contact details of worker's grievance mechanism will be provided. Workers will be encouraged to use the existing project grievance mechanism to report concerns relating to communicable diseases. (g) Avoid gender-based violence by taking appropriate measures such as informing/training workers, ensuring Contractors have a code of conduct in place and aware of the GM.
	Occupational Health and Safety (Worker Safety and communicable diseases exposure concerns)	(a) All activities will be implemented in line with both the Law on Occupational Health and Safety (Official Gazette No.28339, dated June 30, 2012) and its relevant regulations, and the World Bank Group's EHS Guidelines. (b) The Contractor formally agrees that all work will be carried out in a safe and disciplined manner and is designed to minimize risks on neighboring residents and environment. (c) The Contractor will ensure a safe working environment for the workers and supply appropriate personal protective equipment (PPE) in line with international best practice and Turkish Legislation including the health and safety measures related to communicable diseases provided by the Ministry of Health and Ministry of Labor and Social Security (always hardhats, as needed masks and safety glasses, harnesses, and safety boots, etc.). In collaboration with local health authorities, that medical staff, first aid facilities, sick bay, ambulance services and any other medical services specified will be always available at the site and at any accommodation. If/when the project may need to refer sick workers to local medical services (given the limited scope of the project), preparation should be made at minimum to identify the ways of agreed communication with the local services, ways to transport the ill worker to the medical facility, scope of services to be provided by the local services. (d) The Contractor will assign personnel with relevant certification and experience in charge of occupational health and safety. (e) Before the works start, a Risk Assessment study will be implemented for all works to be carried out. Relevant procedures and plans (including "Emergency Plans") will be put in place. Both the Risk assessment and Emergency Response Plans will take into consider the communicable diseases risks and other communicable disease risks, as relevant. (f) Appropriate signposting of the sites will be provided and then workers will be informed of key rules and regulations to follow. (g) Occupational Health and Safety (OHS) trainings and toolbox talks will be provided to the employees including the code of conduct indicating the possible risks regarding the work site and works to be carried out. These

ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
		will include regular trainings to workers on communicable diseases symptoms, how to be protected and what to do when symptoms appear. (h) Both trainings and incidents (fatalities, lost time incidents, any significant events including spills, fire, outbreak of pandemic or communicable diseases, social unrest, etc.) will be recorded. (h) Guidance, directives and recommendations of Ministry of Health, Ministry of Labor and Social Security, and World Health Organization shall be followed, and all relevant necessary measures shall be taken, both for occupational health and safety of employees and for workplaces, in case of an outbreak of any other pandemic/communicable disease including communicable diseases.
B. Wastewater treatment system	Water Quality	(a) The approach to handling sanitary wastes and wastewater from construction/building sites (installation or reconstruction) must be approved by the local authorities (b) Before being discharged into receiving waters, effluents from individual wastewater systems must be treated to meet the more stringent quality criteria set out by the national legislation and the World Bank Group's EHS Guidelines on effluent quality and wastewater treatment (c) Monitoring of new wastewater systems will be carried out (d) Site/construction vehicles and machinery will be washed only in designated areas where runoff will not pollute natural surface water bodies
C. Toxic Materials	Toxic / hazardous waste management	(a) Temporarily storage on site of all hazardous or toxic substances will be in safe containers labeled with details of composition, properties, and handling information (b) The containers of hazardous substances shall be placed in a leak-proof container to prevent spillage and leaching (c) The wastes shall be transported by specially licensed carriers and disposed in a licensed facility (d) Paints with toxic ingredients or solvents or lead-based paints will not be used (e) Waste/used fluorescence lamps generated during renovation and construction will be disposed in a licensed facility
D. Traffic and Pedestrian Safety	Direct or indirect hazards to public traffic and pedestrians by construction activities	(a) In compliance with national regulations the contractor will ensure that the construction site is properly secured, and construction related traffic regulated. This includes but is not limited to: ▪ Signposting, warning signs, barriers and traffic diversions: site will be clearly visible, and the public warned of all potential hazards ▪ Traffic management system and staff training, especially for site access and near-site heavy traffic. Provision of safe passages and crossings for pedestrians where construction traffic interferes ▪ Adjustment of working hours to local traffic patterns, e.g., avoiding major transport activities during rush hours or times of livestock movement ▪ Active traffic management by trained and visible staff at the site, if required for safe and convenient passage for the public ▪ Ensuring safe and continuous access to office facilities, shops, and residences during renovation activities, if the buildings stay open for the public by considering universal access practices as well

PART 3: Monitoring Plan

Phase	**What** *is the parameter to be monitored*	**Where** *is the parameter to be monitored*	**How** *is the parameter to be monitored*	**When** *Define the frequency*	**Why** *is the parameter being monitored*	**Cost** *if not included in project budget*	**Who** *is responsible for monitoring*
Preparation (*pre-construction)*							
Implementation *(construction)*							

ANNEX 4. CHANCE FINDS PROCEDURE

This procedure has been prepared in accordance with the Protection of Cultural and Natural Assets Law (No. 2863).

1. Definition of Cultural and Natural Heritages

Cultural assets: All movable and immovable assets above ground, underground or underwater, which are related to science, culture, religion and fine arts belonging to prehistoric and historical periods, or which have been the subject of social life in prehistoric or historical periods, having scientific and cultural original value.
Natural assets: Values above ground, underground or underwater that belong to geological periods, prehistoric and historical periods and need to be preserved in terms of their rarity or their characteristics and beauties.

2. Ownership

All movable and immovable cultural and natural assets that are found are state property.

3. Recognition

All project workers that work in excavation works will be informed about this chance finds procedure and they will be obliged to inform resident engineer upon any unusual find. In addition, although, subproject activities within cultural or natural heritage sites will not be financed, for subproject activities within the 1 km radius of the registered cultural and natural heritage sites, a specialist will be hired to accompany excavation works.

4. Procedure upon Discovery

The procedures that will be followed upon the finding of a cultural or natural heritage during the execution of the works are:

- The worker will inform the resident engineer immediately.
- The resident engineer will immediately stop all the work in the project area, inform the subcontractor/contractor, and take the necessary measures for protection and safety of the heritages.
- The subcontractor/contractor will inform the nearest museum directorate or the village headman or the local administrators, and the PIU within three days at the latest.
- Resident engineer will prepare a chance finds report and submit it to subcontractor/ contractor which then will submit to PIU. Chance finds report will include:
    - date and time of discovery,
    - location of the discovery,
    - description of the heritage,
    - photographs and videos,
    - temporary protection implemented.

All work will be suspended until the competent authorities give permission to continue the work.

ANNEX 5: INDICATIVE OUTLINE OF INTEGRATED PEST MANAGEMENT PLAN

1. Background

outline:

i) the purpose of the Plan,
ii) indicate pest management authorities, and
iii) pest management program objective.

2. Responsibilities of individuals

e.g., of Program Director, Health Chair, Pest Management Coordinator, Pest Management Personnel, etc.

3. General Information

Provide data on land use and soil, in the area where the pesticides are applied; climate, geo-morphology, settlements in the area of concern, population, surface water, etc. as well as inventory of land use and layout of facilities.

4. Priority of Pest Management

e.g., undesirable vegetation, vertebrate pests, etc.

5. Integrated Pest Management

5.1. *Principles of the Integrated Pest Management* are:

a) *Mechanical and Physical Control.* This type of control alters the environment in which a pest lives, traps, and removes pests where they are not wanted, or excludes pests. Examples of this type of control include harborage elimination through caulking or filling voids, screening, etc.

b) *Cultural Control.* Strategies in this method involve manipulating environmental conditions to suppress or eliminate pests. For example, spreading manure from stables onto fields to dry prevents fly breeding. Elimination of food and water for pests through good sanitary practices may prevent pest populations from becoming established or from increasing beyond a certain size.

c) *Biological Control.* In this control strategy, predators, parasites, or disease organisms are used to control pest populations. Sterile flies may be released to lower reproductivity. Viruses and bacteria may be used which control growth or otherwise kill insects. Parasitic wasps may be introduced to kill eggs, larvae, or other life stages. Biological control may be effective in and of it but is often used in conjunction with other types of control.

d) *Chemical Control.* Pesticides kill living organisms, whether they be plants or animals. At one time, chemicals were considered to be the most effective control available, but pest resistance rendered many pesticides ineffective. The trend is to use pesticides which have limited residual action. While this has reduced human exposure and lessened environmental impact, the cost of chemical control has risen due to requirements for more frequent application. Since personal protection and special handling and storage requirements are necessary with the use of chemicals, the overall cost of using chemicals as a sole means of control can be quite costly when compared with nonchemical control methods.

5.2. *Integrated Pest Management Outlines*

Address each major pest or category of similar pests by site, in separate outlines.

5.3. *Annual Workload for Surveillance, Prevention, and Control*

Indicate the number of man-hours for surveillance, prevention, and control of pests.

6. Health and Safety

This chapter should contain health and safety requirements as follows:

6.1. *Medical Surveillance of Pest Management Personnel*. All personnel who apply pesticides should be included in a medical surveillance program.

6.2. *Hazard Communication*. Pest management personnel should be given hazard communication training, including hazardous materials in the workplace. Additional training should be given to new employees or when new hazardous materials are introduced into the workplace.

6.3. *Personal Protective Equipment*. Describe approved masks, respirators, chemical resistant gloves and boots, and protective clothing (as specified by applicable laws, regulations and/or the pesticide label) that will be provided to pesticide applicators. These items will be used during the mixing and application of pesticides as required. Pesticide-contaminated protective clothing should not be laundered at home but commercially. Severely contaminated clothing should not be laundered but considered a pesticide-related waste and disposed, as applicable for hazardous waste.

6.4. *Fire Protection*. The fire safety protection requirements have to be established; the pest management coordinator has to control the implementation of measures to prevent fire.

7. Environmental Considerations.

7.1. *Protection of the Public.* Precautions should be taken during pesticide application to protect the public, on and off the installation. Pesticides should not be applied outdoors when the wind speed exceeds 155 m/min. [7]Whenever pesticides are applied outdoors, care is taken to make sure that any spray drift is kept away from individuals, including the applicator. Pesticide application indoors is accomplished by individuals wearing the proper personal protective clothing and equipment. At no time are personnel permitted in a treatment area during pesticide application unless they have met the medical monitoring standards and are appropriately protected.

7.2. *Sensitive Areas.* No pesticides are applied directly to wetlands or water areas (lakes, rivers, etc.) unless use in such sites is specifically approved.

7.3. *Endangered/Protected Species and Critical Habitats.* Protected migratory birds which periodically occur on the installation cannot be controlled without a permit. The Pest Management Coordinator periodically evaluates ongoing pest control operations and evaluates all new pest control operations to ensure compliance with the list of endangered species No pest management operations are conducted that are likely to have a negative impact on endangered or protected species or their habitats without prior approval from environmental authorities.

7.4. *Environmental Documentation.* An environmental assessment which specifically addresses the pesticide use program on the installation has been prepared. This plan is referenced in the assessment as documentation of pesticide use.

[7] https://www.tarimorman.gov.tr/ABDGM/Belgeler/Uluslararası%20Kuruluşlar/ESMF_03.09.2024_clean-Revised.pdf