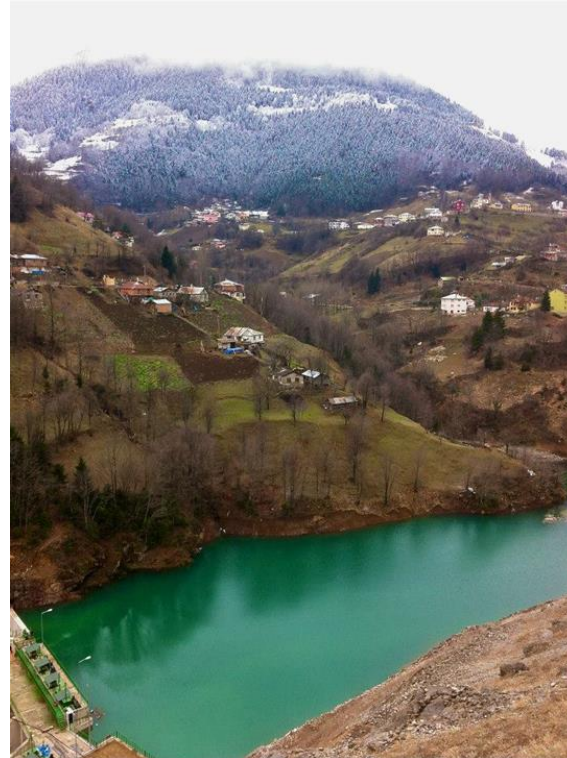


Review & Update of World Bank's
Environmental & Social Safeguard Policies
Phase 3 Consultation Meetings

Turkey Municipal Services Project



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Phase 3 Consultation Meetings
Nov. 2015

**“Road Testing” the new ESSF--Project Case Studies:
what changes, what does not?**

- 1. What are the new requirements if any?**
- 2. What requirements are dropped, if any?**
- 3. Change in effort or expertise required?**
- 4. Added Value?**

From Safeguards to Standards

Standard	Building on	Modernizing
ESS1: Assessment and Management of ESS Risks and Impacts	OP/BP4.01(Environmental Assessment)	Non-discrimination, adaptive management, time frame for compliance
ESS2: Labor and working conditions	OP/BP4.01 and EHS Guidelines	Prohibiting child labor and forced labor, focus on OHS, grievance mechanism
ESS3: Resource Efficiency and Pollution Prevention	OP4.09 (Pest Management) and EHS Guidelines	Efficient management of energy, water, and other resources and materials
ESS4: Community Health and Safety	OP/BP4.37 (Safety of Dams) and EHS Guidelines	Focus on risks and impacts on communities through design and safety of infrastructure, equipment, products, services, traffic, and hazardous materials
ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	OP/BP4.12 (Involuntary Resettlement)	Greater clarity on treatment of state land, land titling, access to common resources, voluntary transactions, force evictions
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	OP/BP4.04 (Natural Habitats) and OP/BP4.36 (Forests)	Requirement to assess and mitigate impacts on biodiversity
ESS7: Indigenous Peoples	OP/BP4.10 (Indigenous Peoples)	Clearer definitions, introduction of FPIC in specified circumstances
ESS8: Cultural Heritage	OP/BP4.11 (Physical Cultural Resources)	Adopt chance find procedure, enhanced consultation with affected communities
ESS9: Financial Intermediaries	OP/BP 4.01	Establish E&S procedures commensurate with FI nature, risk level and impact
ESS10: Information Disclosure and Stakeholder Engagement	Consolidates WB engagement provisions	Meaningful consultation, access to information and grievance redress

Project objectives: to support sustainable environmental services in selected municipalities (in context of meeting EU's environmental directives)

Project description:

Component 1: Municipal Development: Investment in water, wastewater and solid waste infrastructure in selected municipalities (both rehabilitation and new construction)

Component 2: Municipal Technical Assistance: TA for: feasibility studies, urban planning, preparation of design and bidding documents, Operational Improvement Plan (strengthening of technical, financial and environmental capacity); construction supervision

Component 3. Iler Bank Strengthening: TA to assist IB to implement the project and Action Plan (for increasing transparency in operations and supporting needs of municipalities). Including: increasing financial and banking capacity and technical capacity, incremental operating costs, audits

AF in 2013 (added 3 new Municipal & one municipal utility; Restructured 2014: i.a., dropped Istanbul Water and Wastewater subproject)

Environmental issues identified:

- Disposal of sludge and treated effluent from wastewater treatment
- Handling/disposal of chlorine, filter cleaning products from water treatment
- Landfill and WWTP odor
- Leachate treatment – solid waste sites
- Asbestos in old water pipes
- Regular construction site issues (noise, dust, excavation waste/debris, worker and community health and safety, etc.)

Social issues identified:

- Land acquisition (physical and/or economic displacement)
- Community views on proposed WWT and solid waste sites (NIMBY)
- Tariff increases

CATEGORY FI
(with A and B subprojects)

SUBSTANTIAL RISK

MITIGATION MEASURES

Environmental

Site selections to avoid natural habitats

Site selection and technology to reduce odor and avoid impacts on settled areas

Treated effluent follow National and EU standards, with monitoring

WWTP sludge: dewater and send to landfill or incinerator

EMP for construction site management including safety and for handling/storage/disposal of chlorine and other chemicals

Asbestos-containing pipes left in place underground

Social

RPF/RAPs for land acquisition

ESS1: Assessment & Management of E & S Risks & Impacts

New Requirements/Approaches?	Actual (under WB Ops)	Changes under ESSF
Use of Borrower's E & S Framework to the extent possible	<ul style="list-style-type: none"> National water quality standards (largely same as EU) (if public cons. Done under national law, this counts...) Accepted EIA done under national law unless gaps identified 	<ul style="list-style-type: none"> All ESS apply to all operations; Presumption is to use national systems to achieve ESS wherever possible Borrower may request WB to use country system for some or all ESS; WB assesses Borrower Framework (Borrower provides information); Bank and Borrower jointly identify measures to fill gaps.
E & S Assessment	<ul style="list-style-type: none"> EMF prior to Appraisal; site-specific EMPs during implementation Social issues not included in EMF; some identified in PAD (e.g. tariff increases) 	<ul style="list-style-type: none"> Integrated E&S Framework (full range of social issues) prior to Appraisal (?) Site-specific ESMP's only for selected (high/substantial risk) subprojects (?) <p>(See ESS9)</p>
E & S Commitment Plan	No ESCP:	Time-bound ESCP, covering life of project; part of Legal Agreement; emphasis on monitoring and adaptive management
Project Monitoring & Reporting	<ul style="list-style-type: none"> Site-specific EMPs include monitoring of construction impacts and water quality 	ESCP likely to set out broader range of env & social impact monitoring; explicit provisions for adaptive management based on monitoring results
Stakeholder Engagement & Info	<ul style="list-style-type: none"> Public consultations on Safeguards documents (ESMF, RPF, site-specific EMPs 	Preparation and implementation of Stakeholder Engagement Plan

ESS2: Labor & Working Conditions

New Requirements?	Actual (under WB Ops)	Changes, additional effort/expense under ESSF
Working Conditions & Management of Worker Relationships	No explicit requirements beyond routine OHS requirements in contracts	Explicit requirements and Borrower responsibilities relating to direct hires and to relationship between contractors/subcontractors and workers
Protecting the Work Force	No explicit requirements	Explicit requirements relating to non-discrimination; child/forced labor
Grievance Mechanism	Only in RAPs	Separate GM for workers
Occupational Health & Safety (OHS)	general OHS included in EMP and contracts	Explicit requirements for WBG Env Health & Safety Guidelines or other international standard
Contracted Workers	Only OHS in contracts, as above	Expanded requirements in contracts; application to subcontractors; enhanced Borrower responsibility for monitoring
Workers in Community Labor	No requirement	Not applicable (no community labor in project)
Primary Supply Workers	No requirement	Not applicable

ESS3: Resource Efficiency & Pollution Prevention & Management

New Requirements?	Actual (under WB Ops)	Changes, additional effort/expense under ESSF
Resource Efficiency	<ul style="list-style-type: none">• Decreasing water loss was a project objective• No explicit energy efficiency measures but assumption that new equipment is more energy efficient	More explicit consideration of opportunities for energy efficiency
Pollution Prevention & Management	<ul style="list-style-type: none">• Improving water quality and waste management were key project objectives• EMF/EMPs include specific pollution prevention measures• No greenhouse assessment	General analysis of Greenhouse gas emissions; potential climate change impacts on project sustainability

ESS4: Community Health & Safety

New Requirements?	Actual (under WB Ops)	Changes, additional effort/expense under ESSF
Community Health & Safety	Improved water quality and waste management are key project objectives EMF/EMPs include provisions for safe construction practices	Consideration of other potential impacts, e.g. communicable & non-communicable diseases (?) Preparation of emergency response plan
Security Personnel	No requirement	No issues in this project



ESS5: Land Acquisition, Restrictions on Land Use & Involuntary Resettlement

New Requirements?	Actual (under WB Ops)	Changes, additional effort/expense under ESSF
General	Resettlement Policy Framework during preparation Resettlement Action Plans as needed during implementation	Consideration of gender-specific impacts
Displacement	RPF covers physical & economic, permanent & temporary displacement, reduced access	No change
Collaboration with Other Responsible Agencies or Subnational Jurisdictions	RPF describes responsibilities of PIU, local authorities	RPF/ESCP might require more explicit, written agreements among parties involved in land acquisition (e.g. provisions in subloan agreements between Iller Bank and Municipalities)
Technical & Financial Assistance	RPF, PAD describe requirements for project-specific capacity strengthening	ESCP would might specify time-bound assistance to strengthen Borrower capacity beyond project needs; include explicit costs and monitoring provisions

ESS6: Biodiversity Conservation & Sustainable Management of Living Natural Resources

New Requirements?	Actual (under WB Ops)	Changes, additional effort/expense under ESSF
General	OP 4.04 not triggered; subprojects affecting natural habitats are ineligible	ESS6 applies; EMPs include biodiversity assessment for both natural and modified habitats
Primary Suppliers	No requirement	Not applicable (no sourcing of primary resources)

ESS7: Indigenous Peoples

New Requirements?	Actual (under WB Ops)	Changes, additional effort/expense under ESSF
General	Not applicable	Not applicable
Circumstances Requiring Free, Prior & Informed Consent (FPIC)		
Mitigation & Development Benefits		
Grievance Mechanism		
Indigenous Peoples & Broader Development Planning		

ESS8: Cultural Heritage

New Requirements?	Actual (under WB Ops)	Changes, additional effort/expense under ESSF
General	Not applicable (no physical cultural heritage affected)	EIA would consider potential for impact on intangible cultural heritage (unlikely to be an issue)
Stakeholder Consultation & Identification of Cultural Heritage	No requirement	Likely not applicable
Legally Protected Cultural Heritage Areas	↓	↓
Provisions for Specific Types of Cultural Heritage		
Commercialization of Cultural Heritage		

ESS9: Financial Intermediaries

New Requirements?	Actual (under WB Ops)	Changes, additional effort/expense under ESSF
FI Environmental & Social Procedures	No separate policy requirements; EMF describes responsibilities of FI (screening, review, monitoring, reporting)	Apply national law to low/moderate impact projects; apply relevant ESS to subprojects with (non-minor) resettlement/land acquisition, or significant risks or impacts on environment, community health, biodiversity or cultural heritage.
Stakeholder Engagement	FI ensure sub-borrowers hold consultations on subproject Safeguards instruments	<ul style="list-style-type: none"> • Stakeholder Engagement Plan: FI to carry out stakeholder engagement throughout life of project in manner proportionate to project risks and impacts • Put in place mechanisms for external communication • Respond to public inquiries

ESS10: Stakeholder Engagement & Information Disclosure

New Requirements?	Actual (under WB Ops)	Changes, additional effort/expense under ESSF
Engagement during Project Preparation	Public consultations on Safeguards instruments	Preparation of Stakeholder Engagement Plan
Engagement during Project Implementation & External Reporting	No requirement	Implementation of SEP; Regular reporting to public and WB on implementation
Grievance Mechanism	Relating to RAP only	Covering all aspects of project; separate GM for workers
Organizational Capacity & Commitment	Training for FI includes public consultation aspect	Specific time-bound capacity building actions for FI and sub-borrowers in ESCP

Operational Implications of Proposed Framework

Environmental and Social Standard	Prospective Change in Effort/ Resources
ESS 1: Assessment and Management of Environmental and Social Risks and Impacts	Moderate to Substantial
ESS 2: Labor and Working Conditions	Moderate to Substantial
ESS 3: Resource Efficiency and Pollution Prevention and Management	Low
ESS 4: Community Health and Safety	Low
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Low
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	Low to Moderate
ESS 7: Indigenous Peoples	None
ESS 8: Cultural Heritage	Low to None
ESS 9: Financial Intermediaries	Variable (+ and -)
ESS 10: Stakeholder Engagement and Information Disclosure	Moderate

**Thank you for your
Attention**