

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

Turkey Private Sector Renewable Energy and Energy Efficiency Project



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**“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 help increase privately owned and operated energy production from local renewable energy sources, such as hydro, wind and solar, enhance energy efficiency, help to reduce greenhouse gas emissions, and increase Turkey's supply of locally generated electricity.

Project description:

Component 1 - Renewable Energy:

All renewable energy sources for electricity production are eligible for financing including hydro, wind, geothermal, biomass, and solar energy, as well as renewable resources (such as geothermal) for heating and cooling.

Component 2 - Energy efficiency:

The new project proposes to cover also energy efficiency investments in industries. Some of the subsectors likely to be borrowers include iron and steel, cement, ceramics, chemicals and textiles.

Sub-project types include small hydropower plants, wind power plants, solar power plants, geothermal plants and energy efficiency investments for SMEs



Issues identified in project appraisal:

Environmental issues:

Regular construction site issues (noise, dust, excavation waste/debris, worker and community health and safety, etc.)

Impacts on water quantity and quality

Impacts on biodiversity (bird migration routes for WWPs, migratory fish species for HEPPs...)

Degradation of habitats

Social issues:

Land acquisition / resettlement

Public acceptance / opinion on siting

Downstream impacts for water users

Employment of local workers

CATEGORY FI
(with A and B subprojects)
HIGH / SUBSTANTIAL RISK

Mitigation measures:

Environmental

Site selections to avoid natural habitats and to mitigate biodiversity impacts

EMP for construction site management including safety

Fish ladders

Monitoring of bird collisions

Environmental Flow

Social

RPF/RAPs for land acquisition

Preference for local employment

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 construction standards (access roads, tree cutting) Public consultation meetings according to national EIA law, unless gaps identified. 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 EIAs/EMPs during implementation Social issues not included in EMF 	<ul style="list-style-type: none"> Integrated E&S Framework (full range of social issues) prior to Appraisal (?) Site-specific EIAs/ESMPs only for selected (high/substantial risk) subprojects (?) (See ESS9)
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"> Monitoring requirements in Site-specific EMPs 	ESCP likely to set out broader range of env & social impact monitoring; explicit provisions for adaptive management based on monitoring results
Stakeholder Engagement & Info Disclosure	<ul style="list-style-type: none"> Public consultations on Safeguards documents (ESMF, RPF, site-specific EMPs and RAPs) 	Preparation and implementation of Stakeholder Engagement Plan Borrower reporting to public throughout life of project

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 energy loss was a project objective (for EE component)• No explicit measures for other resource efficiency but assumption that new equipment is more energy efficient	More explicit consideration of opportunities for all types of resource efficiency
Pollution Prevention & Management	<ul style="list-style-type: none">• EMF/EMPs include specific pollution prevention measures• No greenhouse gas 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	<ul style="list-style-type: none">- EMF/EMPs include provisions for safe construction practices- Emergency plan in dam safety procedures	No additional requirements.
Security Personnel	No requirement	Training procedures of personnel will be reviewed explicitly, risk assessment and monitoring will be conducted.

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 and sub-borrowers	RPF/ESCP might require more explicit, written agreements among parties involved in land acquisition (e.g. provisions in sub-loan agreements between FI and sub-borrowers)
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 • disclose E&S assessments for high risk subprojects • Explicit provisions on staffing and training (E&S capacity)
Reporting to the Bank	No periodic reporting	Annual reporting to Bank on E&S implementation

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 (but some projects submitted existing “Gold Standard” documentation prepared for other donors)	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**