



ISTANBUL RESILIENCE PROJECT

HABİBLER ANATOLIAN HIGHSCHOOL

**DRAFT ENVIRONMENTAL AND SOCIAL
MANAGEMENT PLAN**

(For Public Disclosure and Consultation)

MAY 2026

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Abbreviations

ACM	Asbestos Containing Materials
AMP	Asbestos Management Plan
AoI	The Area of Influence
CERC	Contingent Emergency Response Component
CHS	Community Health and Safety
CİMER	Presidency's Communication Center
CoC	Code of Conduct
C-ESMP	Contractor Environmental and Social Management Plan
EIA	Environmental Impact Assessment
ERP	Emergency Response Plan
ESF	Environmental and Social Framework
ESHS	Environment, Social and Health and Safety
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESSs	Environmental and Social Standards
E&S	Environmental and Social
GBV	Gender-based Violence
GM	Grievance Mechanism
IMM	Istanbul Metropolitan Municipality
IPCU	Istanbul Project Coordination Unit
IRP	Istanbul Resilience Project
LMP	Labor Management Procedures
LM Plan	Labor Management Plan
MoNE	Ministry of National Education
MSDS	Material Safety Data Sheet
OHS	Occupational Health and Safety
PPE	Personal Protection Equipment
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
SEP	Stakeholder Engagement Plan

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WB	World Bank
WHO	World Health Organization
WWTP	Wastewater Treatment Plant
YİMER	Foreigners Communication Center

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1. Executive Summary

The Istanbul Resilience Project (IRP), financed by the World Bank and implemented by the Istanbul Project Coordination Unit (IPCU), aims to enhance disaster and climate resilience in Istanbul Province by strengthening emergency preparedness, reducing disaster risks, and ensuring that critical public facilities remain fully functional during and after disasters.

The Project is structured under four components:

1. Strengthening the Emergency Preparedness and Response System
2. Enhancing the Resilience of Critical Public Buildings and Facilities
3. Project Management and Technical Assistance
4. Contingent Emergency Response Component (CERC).

Within the scope of Component 2, the reconstruction of *Habibler Anatolian High School in Sultangazi, Istanbul*, has been selected as one of the subprojects to be financed within the scope of the IRP. The project area consists of a school building, a gymnasium, and prefabricated structures (cafeteria and prayer room). These buildings are currently in use and continue to function for educational purposes by students and teachers. Under the scope of the project, the school building and prefabricated structures will be demolished and reconstructed. The gymnasium, which is not included in the project scope, will remain non-operational during the construction activities. The evacuation and relocation process of the school will be completed prior to the initiation of the subproject tender stage under the Ministry of National Education (MoNE) coordination, in accordance with its official procedures. Teaching and administrative staff have also been reassigned within the same framework. The transition process will be centrally managed and completed by MoNE before the planned demolition activities. The school building will be demolished and reconstructed in line with the highest seismic and climate resilience standards. The new facility will serve not only as an educational institution but also as a self-sufficient post-disaster shelter, ensuring continuity of critical services in the aftermath of emergencies.

Key features of the subproject include:

- **Nearly Net-Zero Quality Building:** Designed with energy-efficient systems (aligned with Turkish TS825 and IRP's Class B performance standards), renewable energy installations (such as photovoltaic panels), and enhanced generator capacity.
- **Water Security and Storage:** Equipped with additional storage tanks and rainwater harvesting systems to ensure uninterrupted water supply during disasters.
- **Emergency Preparedness:** Integration of communication systems and basic provisions (such as electricity, water, and food) during the initial period following a disaster (e.g. first 72 hours), supporting both students and surrounding communities.
- **Inclusive Design/Universal Access:** The facility will include tactile surfaces, ramps, elevators, and accessible sanitary facilities, ensuring universal access, particularly for persons with disabilities and other vulnerable groups.
- **Community Shelter Function:** The school has been designed with potential to host displaced individuals during emergencies, contributing to the post-disaster shelter capacity of Istanbul.

The environmental and social screening confirmed that the project does not fall under ineligible activities of the IRP Exclusion List and is categorized as *Moderate Risk* under the World Bank's Environmental and Social Framework (ESF). The main anticipated risks include:

- **Construction-related risks:** dust, noise, traffic disruptions, and construction waste generation.
- **Occupational Health and Safety (OHS) risks:** hazards from heavy equipment, work at height, handling of materials, and potential risks of electrical accidents during construction activities.
- **Community Health and Safety risks:** possible exposure to dust/noise and minor increases in local traffic.

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- **Waste Management:** construction debris and other solid and liquid wastes will require careful monitoring, segregation, and management to ensure recycling and safe disposal in line with national regulations and the IRP Environmental and Social Management Framework (ESMF).

Mitigation measures have been developed and will be implemented in line with the IRP's Environmental and Social Management Framework (ESMF), Labor Management Procedures (LMP), and Stakeholder Engagement Plan (SEP). This site-specific Environmental and Social Management Plan (ESMP) will be applied to ensure compliance with Turkish regulations and the World Bank's Environmental and Social Standards (ESSs).

A dedicated Grievance Mechanism (GM) will be available for all project stakeholders, including workers and community members, to raise concerns, complaints, or suggestions related to the subproject. The GM will be accessible, transparent, and inclusive, ensuring timely responses and effective resolution. Special channels will be provided for sensitive cases, including issues related to Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH), with confidentiality and survivor-centered procedures guaranteed.

The reconstruction of Habibler Anatolian High School will thus contribute directly to IRP's objectives by providing a safe, resilient, green, and inclusive public facility that enhances educational continuity, protects vulnerable groups, and supports emergency response capacity in Sultangazi and beyond.

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2. Introduction

This ESMP has been prepared for the reconstruction of Habibler Anatolian High School under the IRP, financed by the World Bank and implemented by the IPCU.

The purpose of this ESMP is to identify the potential environmental and social risks and impacts of the subproject and to propose appropriate mitigation and monitoring measures. The ESMP ensures that project activities are implemented in compliance with the World Bank ESF, particularly the relevant ESSs, as well as with applicable Turkish laws and regulations, including the Law on Environment No. 2872 (1983) and national labor, occupational health and safety legislation.

The mitigation measures defined in this ESMP will be included in the bidding documents, and their implementation will be ensured by the Contractor under the supervision of IPCU and the Supervision Consultant. This ESMP is a living document and will be updated as necessary during implementation to reflect site conditions, monitoring results, and stakeholder feedback.

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3. Legal and Institutional Framework

This ESMP has been developed in line with the World Bank Environmental and Social Framework (ESF) and the relevant Environmental and Social Standards (ESSs), as well as with Turkish national laws and regulations governing environment, labor, occupational health and safety, and construction.

Key applicable legislation includes the Environment Law No. 2872, the Labor Law No. 4857, the Occupational Health and Safety Law No. 6331, and related secondary regulations. In cases where discrepancies arise between national legislation and the WB's ESF, the requirement that ensures a higher level of environmental and social protection will apply.

The implementation of this ESMP will be ensured through the institutional arrangements of the IPCU, with monitoring and supervision carried out by the supervision consultant, and day-to-day compliance ensured by the contractor.

The IRP ESMF is publicly disclosed and can be accessed at the following links:

[Turkish Version](#)

[English Version](#)

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4. General Project and Project Area Information

Türkiye faces significant disaster risks due to its seismicity, urbanization, and growing population. The IRP has been designed to address these risks by strengthening critical public buildings and ensuring that they can remain operational during and after disasters. Within this framework, the reconstruction of Habibler Anatolian High School has been selected as one of the subprojects to be financed under *Component 2: Enhancing the Resilience of Critical Buildings and Facilities*.

The main objective of the subproject is to rebuild the school to the highest seismic and climate resilience standards, while equipping it as a self-sufficient post-disaster shelter capable of providing basic services (electricity, water, food, and communication) during the first 72 hours of a disaster. The project will therefore contribute to strengthening preparedness, supporting emergency response capacity, and ensuring continuity of education.

Construction activities will consist of new building works (demolition, excavation, reinforced concrete, finishing works, and landscaping) on the site where the former structurally weak building. The school building is currently in use and continues to function for educational purposes by students and teachers. Following the completion of the school evacuation and relocation process by the Ministry of National Education (MoNE) in accordance with its official procedures prior to the subproject tender stage, the school building will be demolished and cleared prior to commencement of the construction. These activities are expected to generate temporary, localized, and manageable environmental and social impacts, such as noise, dust, traffic, and waste.

Based on the current scope and applicable Turkish EIA Regulation, the subproject is not expected to be subject to a full EIA process; however, all applicable environmental, occupational health and safety, and construction management requirements will be complied with.

This ESMP has therefore been prepared as a guidance document to identify potential risks, propose mitigation measures, and ensure that construction and operation activities are carried out in line with both national regulations and the World Bank ESF.

4.1 Project Description

Subproject Title:	Reconstruction of Schools (Nearly Net-Zero Quality, Self-Sufficient Post-Disaster Facility)
Location:	Habibler District, A1 Street, No:51, Sultangazi / Istanbul 2890 Block / 1 Plot
Implementing Institution:	Istanbul Project Coordination Unit (IPCU)
Responsible User Institution:	Ministry of National Education (MoNE)
Site Condition:	The school building is currently in use and continues to function for educational purposes by students and teachers. The school building will be vacated and subsequently demolished prior to the commencement of construction activities.
Building Information:	Planned as one block, with an approximate enclosed area of 8,915 m ²
Estimated Cost:	The project consists of 8,915 m ² of enclosed area, and relevant authorities should develop their own cost estimations as appropriate.
Construction Period:	18 months (Approx.)

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4.2 General Information and Objectives

The subproject area is located in Sultangazi District on the European side of Istanbul, within the Marmara Region of Türkiye. The district is predominantly characterized by a dense urban setting, with residential areas supported by commercial and public service functions. Sultangazi has experienced significant population growth over time, resulting in a relatively high-density settlement pattern. The area has access to the wider metropolitan transport network through existing road infrastructure and public transportation services. Urban development and infrastructure improvement activities are ongoing within the district.

The subproject site is situated in Habibler District of Sultangazi, at A1 Street No:51, Parcel 2890/1. The area is designated as a Secondary Education Area under the zoning plan, and the land is state-owned under the Ministry of Treasury and Finance, officially allocated to the Ministry of National Education (MoNE).

The school building will be demolished and reconstructed. Education activities for Habibler Anatolian Highschool will be temporarily carried out in a different educational building located in the Sultangazi district, to avoid disruption during construction, in coordination with the Ministry of National Education (MoNE) and in line with its established procedures.

Building Location

The subproject area is easily accessible by local roads and is connected to Sultangazi by public and private transport options.

The Area of Influence (AoI) is defined at the neighborhood scale, covering the broader built-up area in which the project site is located, including surrounding residential areas and nearby public facilities. Based on the surrounding receptors identified within the AoI, the main sensitive receptors are as follows (approx. straight-line distances):

- **Residential buildings:** The project site is located within a densely built urban residential area in Sultangazi District. The surrounding neighborhood is characterized by high-density housing with supporting commercial and public service functions typical of an urban settlement pattern.
- **Educational facilities:** Educational facilities are located within close proximity to the project site, including 125th Year Primary School (~98 m) and Ergun Baylav Special Education Practice School (~132 m).
- **Healthcare facilities:** No hospitals or major healthcare facilities have been identified within the Area of Influence (AoI).
- **Religious facilities:** Key religious sites within the AoI include Habipler Cemevi (~94 m), Kanuni Sultan Süleyman Mosque (~273 m), and Habibler 15 Temmuz Şehitleri Mosque (~482 m).
- **Government/public facilities:** Public facilities within the AoI include Habibler Neighborhood Headman Office (~120 m), Aşık Şenlik Park (~150–160 m), Sultangazi Traffic Training Park (~370 m), Sultangazi Police Station (~460 m), and nearby cemeteries such as Cebeci Cemetery (~620 m) and Habibler Cemetery (~700 m).
- **Infrastructure:** No major critical infrastructure facilities such as water treatment plants, reservoirs, or energy generation facilities have been identified within the immediate AoI based on available information.
- **Transportation infrastructure:** No metro or railway lines are located in close proximity to the project site.

A general view of the project site is presented in Figure 1.

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Site photographs (Annex 1) — including views of the entrance, garden, and surrounding trees — as well as satellite and aerial imagery (Annex 2) and land registry records (Annex 3) are provided in the annexes to this ESMP. In addition, a location map showing the project site and nearby infrastructure is presented in Annex 2.

Annex 3 (Land Register) presents the official title deed information for the project site, including the parcel and block numbers, total land area (8,915 m²), land use designation (“Secondary Education Area”) and registration under the Ministry of Treasury and Finance, confirming public ownership and allocation to the Ministry of National Education for educational purposes. Annex 4 (Topographic Survey) provides detailed information on the site’s existing elevation, boundaries, and physical features, supporting the design and layout of the new school building. Annex 5 (Zoning Status Letter) includes the official confirmation of the land-use designation and verifies that the site is planned as a Secondary Education Area under the applicable zoning plans.



Figure 1: General View of Habibler Anatolian Highschool (Sultangazi, Istanbul)

4.3 Subproject Description and Activities

The subproject consists of demolishing the existing structurally weak school building and reconstruction of Habibler Anatolian Highschool in Sultangazi, Istanbul. The former school building, identified as structurally weak, will be demolished and debris will be cleared prior to the commencement of construction activities. The demolition will be financed under the subproject. The existing school building will be vacated under the coordination of the Ministry of National Education (MoNE), and is scheduled for demolition prior to construction. During the construction period, all students, teachers, administrative staff, and support personnel (including cleaning and canteen staff) continue their educational and administrative activities in accordance with the procedures of the Ministry of National Education (MoNE), ensuring continuity of education without interruption.

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The new school will be constructed as a single-block building with a total enclosed area of approximately 8,915 m². It will be designed to meet the highest seismic and climate resilience standards and to function as a self-sufficient post-disaster shelter. Key design features include:

- Additional water storage capacity,
- Renewable energy systems (such as photovoltaic panels),
- Expanded generator capacity, and
- Enhanced communication systems to ensure building functionality during emergencies.

Planned construction activities include:

- Site preparation and excavation,
- Reinforced concrete and superstructure work,
- Interior and exterior finishing works,
- Landscaping and external arrangements, and
- Procurement and installation of building materials and equipment.

No new infrastructure such as transportation routes, electricity, water, or wastewater lines is required, as the site is already serviced by existing urban infrastructure.

Construction activities are expected to generate typical short-term environmental and social impacts such as dust and noise emission, generation of construction waste, increased traffic, and potential risks to community health and safety (CHS) and occupational health and safety (OHS). These impacts will be mitigated through the implementation of the measures described in this ESMP and the Contractor's Environmental and Social Management Plan (C-ESMP), ensuring compliance with relevant national regulations and the IRP ESMF.

5. Environmental and Social Management Plan

This ESMP outlines the key measures that the Contractor and other responsible parties must implement during the subproject activities to prevent, minimize, or mitigate potential environmental and social risks and impacts. It summarizes site-specific risks identified for the reconstruction of Habibler Anatolian Highschool, together with the corresponding mitigation measures, monitoring indicators and frequency, assigned responsibilities, indicative costs and the overall roles of all parties involved in project implementation.

The ESMP serves as a practical tool to ensure that all project-related risks—including environmental, occupational health and safety, community health and safety, waste management, and stakeholder engagement—are managed in line with the World Bank ESF and the relevant national legislation.

The **Supervision Consultant** will be responsible for monitoring the implementation of the mitigation measures, assessing the Contractor's environmental and social management system and performance, organizational capacity, and site-specific sub-plans. The Supervision Consultant will also review the Contractor's ESMP (C-ESMP) and provide recommendations for improvement. The **Contractor** is obliged to prepare, adopt, and implement the Contractor's Environmental and Social Management Plan (C-ESMP), based on this subproject's ESMP, **prior to the commencement of civil works**, ensuring that all environmental and social commitments are fully met.

In addition to C-ESMP, the **Contractor will prepare and submit the following** sub-management plans **for review by the Supervision Consultant and approval by IPCU:**

- Waste Management Plan
- Asbestos Management Plan
- Community Health, Safety and Traffic Management Plan
- Labor Management Plan (in line with the Project LMP)
- Occupational Health and Safety Plan (OHS Plan)
- Project-Level Stakeholder Engagement Plan (to be prepared in accordance with project SEP)
- Grievance Mechanism (GM) Procedures
- Chance Find Procedures

All sub-management plans will be submitted and approved before construction works begin and will remain in force throughout the construction period.

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Table 1 Environmental and Social Management Plan

Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring
		Planning	Construction	Operation		Continuous	Monthly	Quarterly	
General for All Construction Works									
Environmental and Social (E&S) Management	<p>Contractor will prepare and submit for approval and subsequently implement its Contractor ESMP (C-ESMP). The C-ESMP should be submitted prior to the commencement of construction works and no construction activities will be carried out under the sub-project until it is reviewed and approved by the IPCU through support from the Supervision Consultant.</p> <p>The C-ESMP will include at least the following site-specific management plans:</p> <ul style="list-style-type: none"> • Occupational health and safety (OHS) management plan including risk assessment and emergency response plan (see the outline in ANNEX 6 and ANNEX 9 of the Environmental and Social Management Framework (ESMF) of the project) • Community health and safety (CHS) management plan including traffic management plan (see outline in ANNEX 7 of ESMF of the project) • Waste management Plan (see ANNEX 5 of ESMF of the project) • Chance Finds Procedures (see ANNEX 4 of ESMF of the project) • Labor Management Plan (to be prepared in accordance with project LMP) • Project-Level Stakeholder Engagement Plan (to be prepared in accordance with project SEP) • Grievance mechanism (GM) for both community and workers. • Asbestos Management Plan (see ANNEX 8 of ESMF of the project) 	X	X		All sub-management plans are approved prior to construction and implemented throughout the construction period		X		Contractor (Implementation) IPCU/Supervision Consultant
	<p>The Contractor shall hire or appoint full-time one environmental and social and one full-time OHS specialists prior to the commencement of construction works. The</p>	X	X		Relevant E&S staff are	X			Contractor (Implementation)

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Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring
		Planning	Construction	Operation		Continuous	Monthly	Quarterly	
	Contractor shall submit the CVs of specialists for approval to IPCU via Supervision Consultant. These specialists will be present at the site throughout the construction period.				mobilized and maintained throughout the construction period				Supervision Consultant
	<ul style="list-style-type: none"> The Contractor will prepare a training program and provide training to all its staff, before they start working on site, on basic environmental, social, health and safety (ESHS) risks associated with the proposed construction works and the workers' responsibility. The training program shall be repeated on quarterly basis. The Contractor's quarterly training program will also cover topics related to Code of Conduct (CoC) such as sexual harassment particularly towards women and children, violence, including sexual and/or gender-based violence and respectful attitudes while interacting with the local community. 	X	X		Training program approved and all relevant staff trained Training records		X		Contractor (Implementation) Supervision Consultant
Resource Efficiency and Pollution Prevention	<p>To address the identified risks and enhance resource efficiency and pollution prevention, the following measures will be implemented:</p> <ul style="list-style-type: none"> Ensure that all retrofitted buildings achieve at least Turkish Class C Energy Performance Certification standards (TS825) and all newly constructed buildings achieve at least Class B. Integrate renewable energy systems, such as solar panels, to reduce energy consumption and ensure operational continuity during disasters. Install water-saving systems, including low-flow toilets, efficient taps, and showerheads, and implement rainwater harvesting and greywater reuse where feasible and/or applicable. Reuse demolition materials (e.g., debris as filling material) and ensure high percentage of recycling of iron and other recyclable materials. 	X	X		Compliance with energy and water efficiency standards, proper waste and pollution management , implementation of nature-based solutions,			X	Contractor (Implementation) Supervision Consultant

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Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring
		Planning	Construction	Operation		Continuous	Monthly	Quarterly	
	<ul style="list-style-type: none"> Enhance green infrastructure by creating parks, green roofs, and vegetative buffers to manage stormwater, mitigate urban heat effects, and conserve biodiversity where feasible and/or applicable. Regularly monitor and evaluate the performance of nature-based solutions to ensure their long-term effectiveness. The areas where waste management will be carried out during the operation process should be determined at the planning stage. Conduct a tree survey during the planning phase to identify and document existing trees on the site, ensuring protection and conservation of mature trees wherever possible. Tree planting and the use of fire-resistant native plant species in landscaping projects can mitigate urban heat island effects while supporting ecological functions. Nature-based solutions, such as rainwater gardens and permeable surfaces, can reduce runoff, recharge groundwater, and enhance local ecosystems. 				and stakeholder feedback resolution				
Air Pollution (Dust and Exhaust)	<ul style="list-style-type: none"> Minimize dust from exposed work sites by applying water on the ground regularly during the dry season. Construction debris shall be kept in a controlled area and sprayed with water mist to reduce debris dust especially during the dry season Keep stockpiles of aggregate materials covered to prevent suspension or dispersal of fine soil particles during windy days or disturbances by stray animals. In case of pneumatic drilling during excavation, dust shall be suppressed by ongoing water spraying and/or construction dust screen enclosures at the site. The surrounding environment, such as roads, shall be kept free of debris to minimize dust. Trucks transporting excavated materials or construction waste shall have their loads securely covered to prevent dust and 		X		Visual inspection of air quality control measures Records of maintenance Records of complaints	X			Contractor (Implementation) Supervision Consultant

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Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring
		Planning	Construction	Operation		Continuous	Monthly	Quarterly	
	spillage during transit. <ul style="list-style-type: none"> There shall be no open burning of construction or waste materials at the site. 								
Noise	<ul style="list-style-type: none"> Limit construction activities to hours specified by national regulations, and coordinate with nearby communities to schedule noisy tasks during times that cause minimal disturbance. During operations, equipment will be placed as far away from residential/community areas as possible. All equipment will be maintained to keep it in good working order by manufacturing maintenance procedures and installing acoustic enclosures around generators to reduce noise levels. Use when needed and feasible noise-control methods such as fences, barriers or deflectors (such as muffling devices for combustion engines or planting of fast-growing trees) Avoid the unnecessary use of alarms, horns and sirens. Minimize project transportation through community areas. Maintain a buffer zone (such as open spaces, rows of trees or vegetated areas) between the project site and residential areas to lessen the impact of noise to the living quarters. Noise measurements shall be conducted if any grievance regarding noise generation is received from the nearest receptors. If measured levels are above limit values, mitigation measures shall be enhanced in this respect, i.e., installing acoustic barriers for mechanical equipment, limiting the hours of operation for specific pieces of equipment or operations, etc. 		X		Visual inspection of noise control measures Records of complaints	X			Contractor (Implementation) Supervision Consultant
Health and Safety	When planning activities, discuss steps to avoid people getting hurt. It is useful to consider: <ul style="list-style-type: none"> Construction place: Are there any hazards that could be removed 	X			Visual inspection	X			Contractor (Implementation)

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Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring
		Planning	Construction	Operation		Continuous	Monthly	Quarterly	
OHS-related risks due to unsafe practices and hazards at work sites such as work at height, rotating and moving equipment, electrical safety, working with hazardous material, etc.	<p>or should warn people about?</p> <ul style="list-style-type: none"> The people who will be taking part in construction: Do the participants have adequate skill and physical fitness to perform their work safely? The equipment: Are there checks you could do to make sure that the equipment is in good working order? Do people need any particular skills or knowledge to enable them to use it safely? Electricity Safety: Do any electricity good practices such as the use of safe extension cords, voltage regulators and circuit breakers, labels on electrical wiring for safety measures, awareness on identifying burning smells from wires, etc. apply at the site? Is the worksite stocked with voltage detectors, clamp meters and receptacle testers? 				Employee records Equipment				Supervision Consultant
	<ul style="list-style-type: none"> Appropriate signposting of the construction sites will inform workers of key rules and regulations to follow. The contractor's OHS specialist will provide a brief daily toolbox talk to the construction workers on ESHS risks associated with the construction activity that will be carried out on that particular day. The Contractor will ensure a safe working environment for the workers and before construction activities will supply appropriate personal protective equipment (PPE) in line with international best practice and Turkish Legislation (hard hats, gloves, dust masks, goggles, harnesses and safety boots, etc.). 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 also with the World Bank Group EHS Framework. The Contractor will Immediately notify the IPCU (through supervision consultants) about any serious incident which may have significant adverse effects on the environment, the affected 		X		Visual inspection of control measures OHS records Employee records Incident statistics and records, including near misses	X			Contractor (Implementation) Supervision Consultant

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Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring
		Planning	Construction	Operation		Continuous	Monthly	Quarterly	
	<p>communities, the public or workers. Then, IPCU will notify the World Bank about any serious incident in 48 hours and send an incident investigation report together with the root-cause analysis and corrective action plan no later than 10 days to the World Bank.</p> <ul style="list-style-type: none"> • Keep the worksite clean and free of debris on a daily basis. • The first aid kit should be equipped with bandages, antibiotic creams, etc. or delivered to health institutions. • Following safety guidelines for the storage, transport, and distribution of hazardous materials aiming to minimize the potential for misuse, spills, and accidental human exposure. • Keep corrosive fluids and other toxic materials in properly sealed containers for collection (considering its MSDS) and disposal in properly secured areas. • Ensure structural openings are covered/protected adequately. • Secure loose or light material that is stored on roofs or open floors. • Keep hoses, power cords, welding leads, etc. from laying in heavily travelled walkways or areas. • During heavy rains or emergencies of any kind, suspend all work. • Follow the below measures for construction involving work at height: <ul style="list-style-type: none"> • Do as much work as possible from the ground. • Do not allow people with the following personal risks to perform work at height tasks: eyesight/balance problem; certain chronic diseases – such as osteoporosis, diabetes, arthritis or Parkinson’s disease; certain medications – sleeping pills, tranquilizers, blood pressure medication or antidepressants; recent history of falls – having had a fall within the last 12 months, etc. • Only allow people with sufficient skills, knowledge and experience to perform the task. 				Records of worker’s complaints				

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Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring
		Planning	Construction	Operation		Continuous	Monthly	Quarterly	
	<ul style="list-style-type: none"> • Check that the place (e.g., a roof) where work at height is to be undertaken is safe. • Take precautions when working on or near fragile surfaces. • Clean up oil, grease, paint, and dirt immediately to prevent slipping in accordance with Emergency Response Plan; and • Provide fall protection measures e.g. safety harness, and simple scaffolding/guard rail for works over 4 meters from the ground. • The contractor shall hire trained operators for the safe operation of specialized construction's vehicles 								
<p>Community Health and Safety</p> <p>Community health and safety risks associated with construction activities, including health issues arising from exposure to waste, stagnant water, wastewater, particulate matter, and construction workers, as well as traffic and road-related risks caused by increased traffic volume and the movement of heavy-duty vehicles due to inadequate</p>	<ul style="list-style-type: none"> • Rope off construction area and secure materials stockpiles/ storage areas from the public and display warning signs including at unsafe locations. • Do not allow the entrance of unauthorized person in construction areas. • Regularly drain stagnant water from construction areas to prevent the breeding of mosquitoes and other disease vectors. • Use covered and sealed storage for wastewater to prevent leaks and odors, while maintaining safe drainage systems to avoid contamination of nearby water bodies. • Provide clean and well-maintained sanitation facilities for workers, including toilets and washing stations. • The construction site security personnel must be trained and officially certified. • Control the driving speed of vehicles particularly when passing through a community or nearby school, health center or other sensitive areas. • If school children are in the vicinity, include traffic safety personnel to direct traffic during school hours, if needed. • The project site must be lit during the night. • The surrounding construction area should be kept clean, without 		X		<p>Visual inspection of control measures</p> <p>Traffic accident records</p> <p>Records of complaints</p>	X			<p>Contractor</p> <p>Consultant (Supervision)</p>

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Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring
		Planning	Construction	Operation		Continuous	Monthly	Quarterly	
construction and traffic management.	<p>waste disposed of there. The broken glass should be cleaned immediately to avoid any fires.</p> <ul style="list-style-type: none"> • Following safety guidelines for transportation of hazardous materials to the site aiming to minimize the potential for spills and accidental human exposure due to traffic accidents. • Effective communication systems are needed to inform communities about project activities, potential risks, and emergency procedures. • Regular maintenance such as periodical control of vehicles to minimize potentially serious accidents caused by equipment malfunction or premature failure. • The public will be informed about the work to be carried out, including the measures taken regarding communicable diseases relating to labor influx and -post-disaster context (i.e., infectious disease outbreaks), using appropriate communication tools and methods (e.g., online/virtual and/or physically) in areas accessible to all stakeholders (including work sites). • In case of any epidemic or pandemic / communicable disease, including infectious disease outbreaks, the guidance, guidelines, and recommendations to be provided by the Ministry of Health, the Ministry of Family and Social Services, the Ministry of Labor and Social Security, and the World Health Organization (WHO) will be followed, and all relevant measures will be taken for both employees and workplaces in terms of OHS and CHS. In addition, all construction works will follow the World Bank guidelines to minimize the risk of infectious disease outbreaks transmission during the execution of civil works. • Include evacuation protocols, first aid training, and clear communication strategies in the ERP to protect community health and safety. • Any traffic diversions should take into account the needs of 								

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Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring
		Planning	Construction	Operation		Continuous	Monthly	Quarterly	
	<p>disabled persons.</p> <ul style="list-style-type: none"> The Contractor will ensure the construction site is properly secured and construction-related traffic regulated properly (including proper route planning). This will include but not be limited to: Signposting, warnings, barriers, and traffic diversions: the site will be 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 a safe and convenient passage for the public. 								
<p>Water Quality and Wastewater: Water pollution in nearby surface waters due to wastewater/waste generated at the construction area due to construction activities</p>	<ul style="list-style-type: none"> 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 surface waters. Minimize storage or disposal of generated wastewater on the site. Temporary or final waste disposal and wastewater discharge without treatment near/in surface waters is strictly forbidden to prevent possible adverse impacts on surface waters. No soiled materials, solid wastes, toxic or hazardous materials should be stored in, poured into or thrown into water bodies for dilution or disposal. Construction vehicles and machinery will be washed only in designated areas where runoff will not pollute natural surface waters. Wastewater generated at the construction site will be connected to the sewerage system, if possible, and approved by local 		X		Visual inspection of control measures Septic tank effluent disposal records (if any) Effluent quality measurement records (if any) Records of complaints	X			Contractor <i>(Implementation)</i> Supervision Consultant

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Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring
		Planning	Construction	Operation		Continuous	Monthly	Quarterly	
	<p>authorities. If this is not possible, it will be deposited in the septic tank that will be impervious, in accordance with “Regulation on Pit Opening Where Sewer System Construction is not Applicable” published in Official Gazette No: 13783 dated 19.03.1971. Toilets with temporary septic tank might be used for this purpose as well. Septic tank effluent will be removed periodically by sewage trucks, and disposal will be provided within the scope of the protocol to be made with the relevant municipality that has a licensed wastewater treatment plant (WWTP). The Protocol will be submitted to the IPCU.</p> <ul style="list-style-type: none"> • Activities should not affect the availability of water for drinking and hygienic purposes. • The flow of natural waters should not be obstructed or diverted in another direction, which may lead to the drying up of river beds or flooding of settlements. • Separate concrete works in waterways and keep concrete mixing separate from drainage leading to waterways. 								
<p>Soil and Groundwater Quality: Soil and groundwater pollution due to improper waste management and accidental spills, and soil erosion</p>	<ul style="list-style-type: none"> • Apply the mitigation measures specified in the “Solid and Hazardous Waste” section for proper waste management. Residual (left out) concrete in concrete mixers will not be allowed to wash out into the construction site, its vicinity, or access roads of construction sites. Related trainings will be provided to concrete mixer drivers. • Hazardous and chemicals and materials will be secured in a designated storage area to prevent spillage and tip-over. • Semi-used chemical-containing containers will have lids and lids will be tightened while they are not in use. • In case of a spill of any hazardous material or hazardous wastes, spill prevention methods mentioned in ERP will be put in place in order to limit the exposure area. Workers who might intervene in such incidents should have relevant trainings on emergency 		X		<p>Visual inspection of control measures Incident records Training records Records of complaints</p>	X			<p>Contractor <i>(Implementation)</i> Supervision Consultant</p>

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Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring
		Planning	Construction	Operation		Continuous	Monthly	Quarterly	
	<p>response to spills.</p> <ul style="list-style-type: none"> • Proper spill kits will be placed at appropriate locations in the construction area. • Schedule construction during the dry season, as appropriate. • Contour and minimize the length and steepness of slopes. • Cover with topsoil and re-vegetate (plant grass, fast-growing plants/bushes/trees) construction areas quickly once work is completed. 								
<p>Waste Management EHS risks due to inappropriate management of waste generated due to construction activities (such as construction demolition wastes, hazardous waste, biodegradable waste, recyclable waste, non-hazardous waste, etc.)</p>	<ul style="list-style-type: none"> • Excavation soil, construction and demolition waste Dumping Permit must be obtained from the Municipality. • Excavation waste will be re-used for backfilling purposes as much as possible and recovery and other re-use options will be considered as appropriate (except asbestos or asbestos-containing waste). • Recycling and reusing materials during demolition and construction reduces demand for raw natural resources, indirectly supporting sustainable management practices. • The excess excavation waste shall be transported and disposed of separately by licensed transport vehicles to existing licensed excavation waste storage area(s), identified by the relevant governmental authorities, in the district/region. • On-site storage of wastes prior to final disposal (including earth dug for foundations) should be at least 300 meters from rivers, streams, lakes and wetlands. • After each construction site is decommissioned, all debris and waste shall be cleared. • Keep the records of waste generation and disposal. 	X	X		<p>Visual inspection of control measures Waste generation and disposal records Training records Records of complaints</p>	X			<p>Contractor (Implementation) Supervision Consultant</p>
	<ul style="list-style-type: none"> • Manage wastes in accordance with the waste management hierarchy (prevent, reduce, reuse, recycle, recover, dispose) and train personnel to raise awareness on waste management. 								

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Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring
		Planning	Construction	Operation		Continuous	Monthly	Quarterly	
	<ul style="list-style-type: none"> Temporarily storage on site of all hazardous or toxic substances will be in safe containers labelled in line with Material Safety Data Sheet (MSDS), with details of composition, properties, and handling information. Segregate waste as recyclable, hazardous and non-hazardous waste. Non-hazardous wastes, inert and biodegradable wastes and also recyclables must be collected separately, and special attention must be paid to prevent hazardous wastes in leak-proof container to prevent spillage and leaching in case of mixing with other types of waste. Collect, store and transport waste to appropriately designated /controlled licensed disposal areas/facilities (such as excavation waste storage areas, sanitary landfills, recycling/recovery facilities, etc.). Submit an official letter to IPCU stating that these wastes will be accepted at licensed sites Temporary waste storage area (to be established at the construction area) should be on impermeable ground, covered with a roof, and equipped with a suitable drainage system, proper spill kits and appropriate firefighting equipment. Wastes shall be temporarily stored in this area in separate compartments (labelled with waste codes) according to their types in order not to react with each other. Hazardous wastes shall be stored in the temporary waste storage area for a maximum of six (6) months and non-hazardous wastes for a maximum of one year. Hazardous waste shall be transferred to a licensed disposal facility via licensed waste transportation companies, and recyclable wastes to a relevant licensed recycling/recovery facility. All protocols and waste logs shall be submitted to the IPCU. Train workers on correct transfer and handling of fuels and other 								

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Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring
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	substances and require the use of gloves, boots, aprons, eyewear and other protective equipment for protection in handling highly hazardous materials.								
<p>Stakeholder Engagement and Grievance Mechanism</p> <p>Construction-related complaints and temporary disruption to the local community including eligible property owners</p>	<ul style="list-style-type: none"> Follow the relevant measures suggested in the SEP. Early liaison and effective communication shall be carried out with people who may be affected by the work of the contractor and supervision consultant. Implementation of a program of ongoing liaison and respect for the local environment and residences shall be formed The supervision consultant will appoint a dedicated person(s) accountable for community liaison who will be focused on engaging with the community to provide the appropriate information and to be the first line of response to resolve issues of concern. The Project Grievance Mechanism shall be implemented through the opening and closing of forms and complaints. The names and contact telephone numbers and e-mail addresses of all site personnel with responsibilities for both supervision and management of the works will be displayed on the site information boarding. Once planning consent has been obtained, formal contact will be established with the mukhtar of the neighborhood and those who could potentially be affected by the construction will be informed via mukhtar. This will include consultation with relevant E&S risk management instruments and identifying any particularly sensitive times of the day. Outside normal working hours, security personnel will act as the main point of contact via a dedicated phone number. Security will alert the person(s) accountable for liaison if necessary (available 24 hours). All workers will sign/commit to and be trained on the Code of 	X	X		Records of complaints Stakeholder engagement records	X		<p>IPCU</p> <p>Contractor (Implementation)</p> <p>Supervision Consultant</p>	

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	<p>Conduct to manage the potential adverse impacts on social cohesion and Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) risks.</p> <ul style="list-style-type: none"> Any complaints will be logged, fully investigated, and responded to quickly, advising what action has been taken. Complaints will be registered and reported to the Contractor, Training Consultant, Supervision Consultant and also IPCU. Public notice boards will be established at site entrances during the Planning and Construction phases, providing relevant contact details of the for liaison including environmental matters. 								
<p>Labor and Working Conditions: Risks associated with potential labor influx (such as child labor risks, gender-based violence and harassment, human rights risks, etc.) and other labor issues</p>	<ul style="list-style-type: none"> Follow the relevant measures in Labor Management Plan (LM Plan) to be prepared by the Contractor in accordance with project LMP. Workers will be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment such as their rights under national labor and employment law (which will include any applicable collective agreements). Workers will be paid on a regular basis as required by national law and project LMP. Workers will be provided with adequate periods of rest per week, annual holiday and sick, maternity and family leave, as required by national law and project LMP. Workers will receive written notice of termination of employment and details of severance payments in a timely manner. Workers will be employed on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship. Project workers, including specific groups of workers, such as women, people with disabilities and migrant workers will be 		X		<p>Visual inspection of control measures</p> <p>Health records</p> <p>Employee records</p> <p>Training records</p> <p>Records of worker's complaints</p>	X			<p>Contractor (Implementation)</p> <p>Supervision Consultant</p>

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Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring
		Planning	Construction	Operation		Continuous	Monthly	Quarterly	
	<p>provided with appropriate measures of protection and assistance in line with ESS2 of WB ESF. This process will be executed in accordance with the project LMP.</p> <ul style="list-style-type: none"> Workers are allowed to participate, or seek to participate, in workers' organizations and collective bargaining or alternative mechanisms. Children under the minimum age of 18 will not be employed or engaged by the Contractor in connection with this sub-project. Forced labor, which consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty, will not be used in connection with this sub-project. Prior to commencement of any activities at the project site, a worker's GM will be established by the Contractor at the construction site for all workers to raise workplace concerns. Contact details of the worker's GM will be provided to workers during the induction training. All workers will receive training about their rights under national labor and employment law and regarding the GM upon recruitment and before the implementation of the work. Code of Conduct will be shared with project workers during employment. All workers are obliged to comply with the Code of Conduct and sign relevant documentation at the time of employment. Movement in and out of the construction site will be controlled, and unauthorized access to the site will be prevented. Contractor will confirm that workers are fit for work before they start work, paying special attention to workers with underlying health issues or who may be otherwise at risk. The Contractor shall provide information and awareness of communicable diseases to workers. 								

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Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring
		Planning	Construction	Operation		Continuous	Monthly	Quarterly	
	<ul style="list-style-type: none"> The Contractor shall arrange safe drinking water, adequate toilet facilities for both genders, accommodation, rest and dining areas for the workers. The Contractor shall provide a first aid kit with bandages, antibiotic cream, etc. or health care facilities, and shall identify and train an adequate number of workers to provide first aid during medical emergencies. 								
Cultural Heritage Chance Find	<ul style="list-style-type: none"> Effective communication with local authorities, heritage organizations, and the community will ensure proper handling of any cultural heritage No disturbance of cultural or historic sites. If encountered with any cultural heritage/assets during construction works (especially excavation and earthworks) apply the chance finds procedure (see Error! Reference source not found. of ESMF of the project). 	X	X		Chance finds records		X	IPCU Contractor <i>(Implementation)</i> Supervision Consultant	
Biodiversity: Potential risks to flora and fauna due to construction activities and improper waste management	<ul style="list-style-type: none"> According to Planned Areas Development Regulations (published in the Official Gazette dated July 03, 2017, and numbered 30113 and Attachment: RG-31/12/2022-32060) for residential, trade, tourism, education, worship, health, and sports parcels: 1 tree per 30 m² of area outside the building footprint. If planting on the parcel is not feasible, trees must be planted in designated public areas per zoning plans Tree planting and the use of fire-resistant native plant species in landscaping projects can mitigate urban heat island effects while supporting ecological functions 		X		Tree plantation records Screening Visual inspection of control measures		X	Contractor (Implementation) Supervision Consultant	
Asbestos Management: Environmental, health and safety	<ul style="list-style-type: none"> If asbestos or asbestos containing materials (ACM) are found at a construction site, they should be clearly marked as hazardous waste and managed according to a comprehensive Asbestos Management Plan (AMP). 		X		Visual inspection of control measures		X	Contractor (Implementation) Consultant (Supervision)	

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Potential Risks and Impacts	Proposed Mitigation Measures	Phase			Indicators for monitoring	Frequency of Monitoring			Responsibility for implementation and monitoring
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risks due to asbestos or asbestos-containing materials	<ul style="list-style-type: none"> • The AMP should outline detailed procedures for the safe handling, containment, removal, and disposal of ACM, ensuring compliance with local and international regulations. • The asbestos should be appropriately contained and sealed to minimize exposure. • Prior to removal, if removal is necessary, ACM should be treated with a wetting agent to minimize asbestos dust. • If ACM is to be stored temporarily, it should be securely placed inside closed containers and clearly labelled. 				Asbestos or ACM removal records				

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6. Roles and Responsibilities

The activities to be carried out under the Site-Specific Environmental and Social Management Plan (ESMP) and the parties responsible for these activities are presented in Table 2.

Table 2 Roles and Responsibilities

Responsible Party	Roles and Responsibilities
IPCU	<ul style="list-style-type: none"> • Hire/appoint one environmental, one social, and one OHS specialist to ensure the effective management and monitoring of environmental, social, and OHS risks in compliance with project requirements. • Through its environmental, social and OHS specialists; <ul style="list-style-type: none"> - Coordinate closely with local authorities, contractors, and community leaders to ensure alignment with project goals, environmental and social requirements, and stakeholder expectations. - Develop and maintain a centralized database to track the implementation of environmental and social mitigation measures, grievances, and monitoring data, ensuring accessibility and up-to-date information for reporting to the World Bank and other stakeholders. - Provide oversight, support, and quality control for field staff and contractors working on environmental and social risk management. - Ensure subprojects are screened against the Exclusion List (Table 5 of ESMF of the project). - Prepare E&S Screening Forms for each of the subprojects and submit them to the WB for approval. - For activities requiring ESMPs, prepare site-specific ESMPs by customizing the project level ESMP (Annex-3 of ESMF of the project) and submit at least first five (5) ESMPs for prior review and no objection by the WB for disclosure and consultation purposes. - Disclose and consult upon the WB cleared version of the site specific ESMPs prior to the initiation of the tendering process. Following the consultations, update the site-specific ESMPs to incorporate the outcomes of the consultations and submit it to the WB’s clearance for tendering purposes. - Ensure all tender, bidding and contract documents include relevant E&S management provisions and references to relevant E&S instruments (i.e. ESMPs, SEP, LMP, etc.). - Ensure site-specific ESMPs are annexed to the relevant tendering documents. • Train central and field staff, as well as contractors, on implementing the ESMF and associated plans. • Prior to commencement of civil works, review and approve C-ESMP, LM Plan and E&S sub-management plans to be prepared by the contractor and ensure their implementation throughout the duration of subproject implementation. <ul style="list-style-type: none"> - Visit and monitor E&S performance of construction sites monthly and maintain all correspondences with governmental authorities. - Establish and maintain a grievance mechanism and resolve complaints at all levels. - Notify the World Bank of any serious E&S incidents within 48 hours and provide incident reports with root cause analysis and corrective actions within 10 days. - Oversee the implementation and monitoring of environmental and social mitigation measures.

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	<ul style="list-style-type: none"> - Maintain documentation of progress and prepare consolidated reports for submission to the World Bank on a quarterly basis.
<p>Supervision Consultants (Construction)</p>	<ul style="list-style-type: none"> • Overseeing daily implementation and monitoring of environmental, social and health and safety (ESHS) mitigation measures, and report progress and ESHS performance of the sub-projects to the implementing IPCU monthly. • Ensure contractors comply with legislation, site-specific ESMPs and relevant E&S sub-management plans. • Maintain one OHS specialist and one Environmental and Social Specialist with relevant certification and/or experience in charge of E&S management, in line with the implementation arrangements defined in the Supervision Consultant’s Terms of Reference and the specific needs of the sub-project. • Daily on-site monitoring of the implementation of E&S mitigation measures will be carried out by the Contractor’s designated E&S personnel and verified through regular site visits by the Supervision Consultant. The IPCU will exercise oversight through review of site records, supervision reports, and monthly consolidated E&S performance reports submitted in Section 5.1.c. of IRP ESMF. • Prior to commencement of any construction works on site, in coordination with IPCU, review and approve C-ESMP, LM Plan and E&S sub-management plans prepared by the contractor and ensure their implementation throughout the duration of subproject implementation. All approved documents will be submitted to IPCU within 5 business days. Any deficiencies or non-compliances identified by IPCU will be communicated to the contractor by the supervisor, and the contractor will be required to address them within 15 business days. • Provide training to contractors on E&S and OHS measures. • In close collaboration with the IPCU, ensure effective implementation of the SEP at the site level. • When/where relevant, address grievances received from the stakeholders. • Inform the IPCU about serious E&S (including OHS) incidents immediately.
<p>Contractors</p>	<ul style="list-style-type: none"> • Prior to commencement of any civil works prepare C-ESMP, LM Plan and relevant E&S sub-management plans and submit these documents to the IPCU for their review and approval. • Maintain one full-time OHS specialist and one full-time Environmental and Social Specialist with relevant certification and/or experience in charge of E&S management throughout the construction period, in line with the staffing arrangements defined in the IRP ESMF and reflected in Table 1 and Table 3 of this ESMF. • 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 Supervision Consultants/IPCU immediately. • Notify Supervision Consultant/IPCU through of any serious E&S incidents immediately. • Monitor site activities on daily basis and report on the E&S performance to supervision consultants/IPCU on monthly basis. • Provide regular training and capacity-building sessions for the workforce on, but not limited to, E&S risk management (labor rights and obligations under the LMP, Stakeholder engagement practices based on SEP requirements, ERP, OHS plan, community safety and traffic management plan, waste management plan, Code of Conduct, etc.)

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7. Capacity Building and Training

The Contractor shall design and implement a structured training program for all project workers and relevant stakeholders. At a minimum, the following trainings will be delivered and repeated periodically:

- Environmental and Social Management & Occupational Health and Safety Induction Training – for all workers before starting site activities.
- Site Access and Orientation Training – including induction for visitors and orientation for newly mobilized workers.
- Traffic and Pedestrian Safety Training – covering movement of heavy vehicles, safe pedestrian crossings, and community-sensitive driving practices.
- Code of Conduct Training – addressing respectful workplace practices, sexual harassment prevention, and interaction with local communities.
- Gender-Based Violence (GBV), Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Training – focusing on awareness, prevention, and survivor-centered response.
- Waste Management Training – segregation, storage, transport, and safe handling of construction and hazardous wastes.
- Emergency Preparedness and Response Training – including fire safety, evacuation drills, spill response, and first aid.
- Incident and Accident Reporting Training – procedures for immediate notification, root cause analysis, and corrective actions.
- Grievance Mechanism (GM) Training – how workers and community members can access and use the GM system.
- Stakeholder Engagement and Communication Training – for E&S staff and supervisors to ensure meaningful interaction with local communities.

The Contractor is responsible for organizing and financing these trainings, either internally or through external certified providers.

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8. Implementation Schedule and Cost Estimates

An indicative cost schedule has been prepared for the mitigation and capacity building measures to be implemented throughout the Project.

Table 3 Indicative ESMP Implementation Budget¹

Activity/Cost Item	Potential Cost (USD)
Full-time Environmental, Social & OHS Consultants	80.000,00 USD
Monitoring / Site Visits / C-ESMP Preparation	10.000,00 USD
Trainings, Awareness, Capacity Building	15.000,00 USD
Implementation of SEP & ESMP Measures	10.000,00 USD
Communicable Disease Prevention	5.000,00 USD
TOTAL	120.000,00 USD

¹ These indicative costs are covered under the Project budget and provided for planning purposes. Contractors shall reflect their own implementation costs in their bids.

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9. Stakeholder Engagement and Grievance Mechanism

Stakeholder engagement is an inclusive and continuous process to be carried out throughout the Project lifecycle. It supports the establishment of strong, constructive, and responsive working relationships and is essential for the successful management of the Project's environmental and social (E&S) risks and impacts.

Within the scope of the Istanbul Resilience Project (IRP), a Stakeholder Engagement Plan (SEP) has been prepared to guide structured engagement with stakeholders, including the management and users of potentially affected or directly benefiting buildings. The SEP facilitates the management of stakeholder expectations and risks, helps reduce potential conflicts and delays, and ensures early, frequent, and transparent communication.

The SEP also establishes accessible and inclusive tools for affected people to raise concerns, suggestions, and grievances, enabling the Istanbul Project Coordination Unit (IPCU) and other responsible institutions to respond and manage issues effectively.

During project preparation, consultation meetings were organized with representatives from public institutions, local authorities, school administrations, teachers, parents, and community members. In these meetings, the Project's financing sources, objectives, components, and eligibility criteria for building selection were presented. The concerns, questions, and feedback of participants were documented and reflected in the SEP.

Following the disclosure of draft version of this site-specific ESMP, and at least 7 business days after its public announcement, a public consultation meeting will be organized with the participation of supervision consultants, IPCU staff, and relevant stakeholders. The minutes of this consultation will be published on the IPCU's official website. Feedback from stakeholders will be incorporated into the final version of this ESMP and the final version of the ESMP will be annexed to the documents.

A dedicated Grievance Mechanism has been established to ensure that any grievances or requests related to subprojects financed under the IRP —raised by contractors, supervision staff, building users, or the community—are addressed in a timely, effective, and fair manner. The GM operates through multiple accessible channels, as detailed below:

Project-Specific Channels (IPCU)

- **Hotline (phone):** +90 (216) 505 55 00 (during working hours)
- **E-mail:** info@ipkb.gov.tr
- **Postal Address:** Istanbul Project Coordination Unit (IPCU), Kısıklı Mah. Alemdağ Yan Yolu Cad. No:6, 34692 Üsküdar/İstanbul
- **In-person:** Stakeholders may visit IPCU offices during working hours
- **Online Grievance/Suggestion Form:** <https://www.ipkb.gov.tr/sikayet-formu/>
- **Social Media Channels:**
 - Twitter: <https://x.com/ipkbgovtr>
 - Facebook: <https://www.facebook.com/ipkbgovtr>
 - Instagram: <https://www.instagram.com/ismepipkb/>
 - LinkedIn: <https://www.linkedin.com/company/ipkb>
 - YouTube: <https://www.youtube.com/user/IPKBirimi>
- **On-site Complaint/Suggestion Boxes:** These will be established at project sites and IPCU offices, once activities commence on site, ensuring anonymity and confidentiality.

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National Channels

- **CİMER (Presidency’s Communication Center):**
 - Website: *www.cimer.gov.tr*
 - Call Center: 150
 - Phone: +90 (312) 590 20 00
 - Fax: +90 (312) 473 64 94
 - Mail: Presidency of the Republic of Türkiye Directorate of Communications
 - In-person: Through provincial/district governorates and ministries
- **YİMER (Foreigners Communication Center):**
 - Website: *www.yimer.gov.tr*
 - Call Center: 157
 - Phone: +90 (312) 157 11 22
 - Fax: +90 (312) 920 06 09
 - E-mail: *yimer@goc.gov.tr*
 - In-person: At Directorate General of Migration Management offices
- **Istanbul Metropolitan Municipality (IMM) – White Desk (Beyaz Masa):**
 - Hotline: 153 (within Istanbul)
 - Online: *https://beyazmasa.ibb.gov.tr/*

World Bank Channels

- **World Bank Grievance Redress Service (GRS):**

Project-affected people may submit complaints directly to the GRS if they believe they are adversely affected by a World Bank-financed project.

- Website: *https://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service*

- **World Bank Inspection Panel:**

Communities and individuals who believe that they are or may be harmed by a project due to the World Bank’s non-compliance with its policies may submit a complaint to the Inspection Panel. The Panel independently determines whether harm has occurred and communicates directly with the Bank.

All grievances received through these channels will be recorded, tracked, and responded to in accordance with the Project’s Grievance Mechanism Procedures. Roles and responsibilities for managing grievances are described in detail in Section 7 of the SEP.

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10. Contractor's Reference Documents

The Contractor is expected to utilize all Environmental and Social (E&S) documents prepared under the Istanbul Resilience Project (IRP). Following contract award, the Contractor shall further develop and customize this site-specific Environmental and Social Management Plan (ESMP), which has been prepared in outline by the IPCU experts for the respective subproject.

In addition to the C-ESMP, the Contractor shall prepare and submit site-specific sub-management plans as defined in Section 5 of this ESMP, based on the templates provided in the ESMF annexes.

These plans shall be prepared by the Contractor and submitted to the IPCU for review and approval prior to the commencement of construction activities.

All relevant template documents can be accessed through the IRP Environmental and Social Management Framework (ESMF) and its annexes (*see IRP ESMF*), which serve as reference documents for the Contractor.

11. Review and Approval

PREPARED BY: Hande GÜLCAN IPCU - Environmental Engineer, MSc Date: 04/06/2026	
REVIEWED BY: Ashhan AL IPCU – Urban Planner/Social Specialist Date: 04/06/2026	APPROVED BY: Burak REİS IPCU - E&S Team Leader Date: 04/06/2026

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ANNEXES

ISTANBUL RESILIENCE PROJECT

Annex 1. Site Photographs



Photo 1: Entrance



Photo 2: Project Area

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Photo 3-4-5: School Building



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Photos 6-7-8-9: School And Surrounding Area



Photo 10: Project Area and Other Structures (Canteen)

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Photo 11: Project Area and Other Structures (Prayer Room)



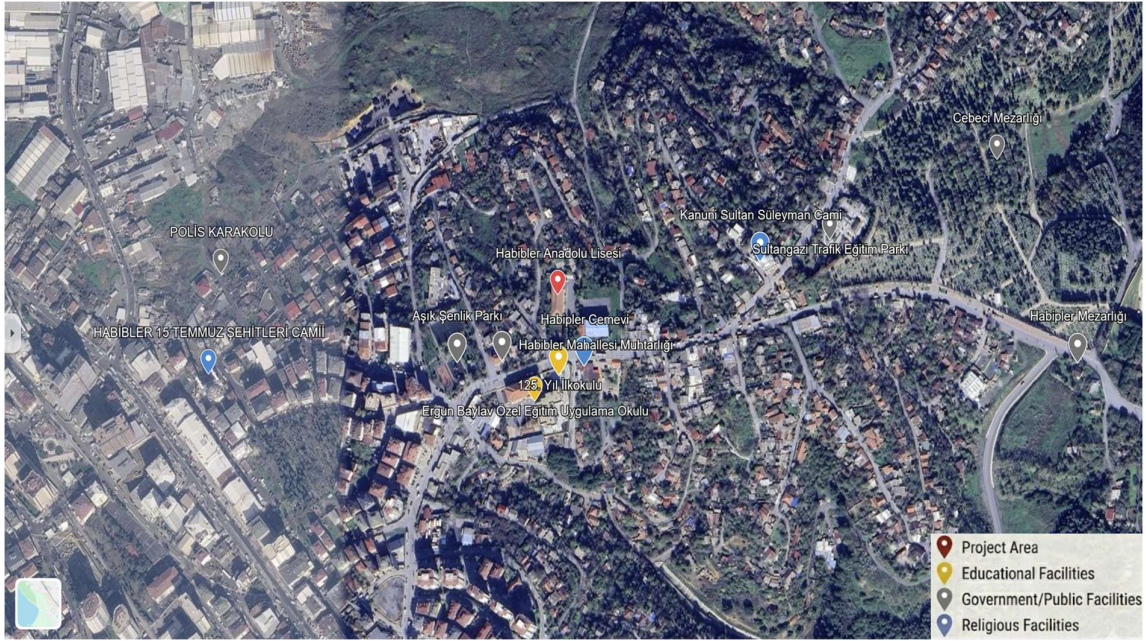
Photo 12: Project Area and Other Structures (School Gym)

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Annex 2. Aerial View of the Project Site and Surroundings



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Habibler Anatolian Highschool Area of Influence

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Annex 3. Land Registration Documents

TAŞINMAZA AİT TAPU KAYDI (Aktif Malikler için Detaylı - ŞBİ var)			
Zemin Tipi	: Ana Taşınmaz	Ada/Parsel	: 2890/1
Zemin No	: 24992003	Yüzölçüm	: 8.915,00 m2
İl / İlçe	: İSTANBUL/SULTANGAZI	Ana Taş. Nitelik	: ARSA
Kurum Adı	: Sultangazi TM		
Mahalle / Köy Adı	: CEBEÇİ Mah.		
Şevki	:		
Çift / Sayfa No	: 36 / 3460		
Kayıt Durum	: Aktif		

TAŞINMAZ ŞERH / BEYAN / İRTİFAK

S/Bİ	Açıklama	Malik / Lehdar	Tarih - Yevmiye	Terkin Sebebi - Tarih - Yev.
Beyan	İMAR PLANINDA ORTAOKUL OLARAK AYRILMIŞTIR. 13/09/1989 TAR.2917 YEV	MİLLİ EĞİTİM BAKANLIĞI	13/09/1989 - 2917	--
Şerh	İHTİYATİ TEDBİR 27/03/2003 Y 1578		27/03/2003 - 1578	--

MÜLKİYET BİLGİLERİ

Sistem No	Malik	Elbirliği No	Hisse Pay/Payda	Metrekare	Edinme Sebebi - Tarih - Yev.	Terkin Sebebi - Tarih - Yev.
55869819	İSTANBUL BÜYÜKŞEHİR BELEDİYESİ	TAM		8.915,00	İmar (TSM) - 13/09/1989 - 2917.	--

S/Bİ	Açıklama	Malik / Lehdar	Tarih - Yevmiye	Terkin Sebebi - Tarih - Yev.
Şerh	İhtiyati Tedbir: İSTANBUL KADASTRO MAHKEMESİ nin 14/04/2016 tarih 2013/69 E. sayılı Mahkeme Müzekkeresi sayılı yazıları ile (Açıklama: İSTANBUL KADASTRO MAHKEMESİ nin 14/04/2016 tarih 2013/69 E. s.v. gereğince)		18/05/2016 - 8662	--

* Tesis edilen şerhler ve beyanlar salt elektronik ortamda tutulmaktadır.



İSTANBUL RESILIENCE PROJECT

Annex 4. Topographic Survey

İLİ	İSTANBUL				İSTANBUL Kadastro Müdürlüğü APLİKASYON KROKİSİ				NoktaNo	Y	X
İLÇESİ	Sultangazi								1	-19129.500	17029.500
KÖY-MAH	Cebeci								2	-19185.100	17026.550
PLAN NO									3	-19228.050	17024.400
Pafta no	Ada no	Parsel no	Tapu	Alım	APLİKASYONUN				KESİLEN MAKBUZUN		
2/51-52	2890	1	8915	8915	TARİHİ	KF NOSU	TARİHİ	NO SU			
					26.07.2022	1269					
POLİGONLAR	NO	Y	X		NO	Y	X				
		Sağa	Yukarı	cm		Sağa	Yukarı	cm			
									913		

SULTANGAZI KAYMAKAMLIĞI
 İlçe Millî Eğitim Müdürlüğü'nün
 26.07.2022 tarih ve 54083732 sayılı yazısına istinaden
 Zeminde Ölçüm Yapılmadan Tanzim Olundu

Ölçü huzurunda yapılmıştır	Parselin aplikasyonunda esas olmak üzere evraklardan hazırlanmıştır			
	Yukarıda yazılı ölçüler göre zemine tesisi yapılmıştır		Kontrol edilmiştir	
İlgilisinin	Kadastro Teknisyeni	Kadastro Kontrol Mühürü	Kadastro Müdürü	Müdür Yardımcısı
ADI SOYADI	Bayram DEMİRBILEK	Esref BİÇER	Bayram DEMİRBILEK	Müdür Yardımcısı
TARİH	26-07-2022	26-07-2022	27-07-2022	27-07-2022
İMZA				

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Annex 5. Zoning Status Letter

T.C. İSTANBUL İLİ SULTANGAZİ BELEDİYESİ İmar ve Şehircilik Müdürlüğü Sayı : 128454 Tarih : 27/07/2022		İsim : İSTANBUL BÜYÜKŞEHİR BELEDİYESİ Adres : İlgi : 26/07/2022 Tarih ve 54083702..... Sayılı İLÇE MİLLİ EĞİTİM MÜDÜRLÜĞÜNE AIT YAZIYA KARŞILIKTIR				
<p>İmar durumu ve inşaat şartları meri planı veya imar mevzuatına uygun olarak BOŞ ARSA için aşağıda gösterilmiştir. Bu imar durumu ile yalnız proje tanzim ettirilebilir. İnşaat yapılamaz. İmar planında ve mevzuatta bir değişiklik olursa hiç bir hak iddia edilemez.</p> <p>Proje ile müracaat esnasında İSKİ Genel Müdürlüğünce tasdikli fosseptik ve kanal projesi, Kadastro müdürlüğünden alınacak röperli kroki, çap müdürlüğümüzden alınacak İmar İstikamet Rölevesi, blok ebatları, ön, arka ve komşu bahçe mesafeleri, tabi zemin ve yol kotları icab eden yerlerden muhtelif en, boy kesitleri eklenecektir.</p> <p>İmar Kanununun 23. Maddesi ile ilgili olarak İmar ve Şehircilik Müdürlüğü Ruhsat Bürosundan yol ve kanal durumu incelenmeden uygulama yapılamaz. İmar istikameti önünde kalan yol, yeşil alan gibi kamu hizmeti alanları kamu eline geçmedikçe imar uygulaması yapılamaz. Plan notu ektedir.</p>						
A BÖLÜMÜ:913 PARSELİN ORTAÖĞRETİM TESİS ALANINDA KALAN KISMI B BÖLÜMÜ:912 PARSELİN ORTAÖĞRETİM TESİS ALANINDA KALAN KISMI 2890 ADA 1 PARSELİN İMAR DURUMU; 913 PARSELİN A BÖLÜMÜ VE 912 PARSELİN B BÖLÜMÜ İLE TEVHİDİ HALİNDE GEÇERLİDİR.						
MER'İ İMAR PLANI						
Plan Adı : SULTANGAZİ İLÇESİ HAVZAÇI UYGULAMA İMAR PLANI		Kat Adedi : AVAN PROJE	İnşaat Nizamı : AVAN PROJE			
Plan Ölçeği : 1 / 1000		Bina Yüksekliği : AVAN PROJE	TAKS : -			
Tasdik tarihi : 12.07.2013		Bina Derinliği : AVAN PROJE	KAKS - EMSAL : -			
Mahallesi : CEBECİ		Ön Bahçe Mesafesi : KROKİ	Plan Fonksiyonu : ORTAÖĞRETİM TESİS ALANI			
Sokağı : YOL		Yan Bahçe Mesafesi : KROKİ	Arka Bahçe Mesafesi : KROKİ			
Kadastro	Pafta	Ada	Parsel	Alan	<input type="checkbox"/> a- İskan Sahasındadır	<input type="checkbox"/> e- 40 Rakımındadır
	12B3A	2890	1		<input type="checkbox"/> b- İnkişaf Sahasındadır	<input type="checkbox"/> f- Amme Hizmetine Ayrılan Sahasındadır
					<input type="checkbox"/> c- İskan Dışı Sahasındadır	<input type="checkbox"/> g- 4 yıllık programdadır
					<input type="checkbox"/> d- Sanayi sahasındadır	<input type="checkbox"/> h- 5 yıllık programda değildir
İmar durumu imar plan ve imar mevzuatına uygun olarak tanzim ve imza edildi.						
Adı, Soyadı Raporör 27.7/2022 İmza MUSTAFA AKGÜN İNŞAAT MÜHENDİSİ		Adı, Soyadı İmar Durum - İstikamet Şefi/2022 İmza HÜLYA ERKOL ÇEVRE MÜHENDİSİ		Adı, Soyadı İmar ve Şehircilik Müdürü/2022 İmza MEHMET ÇETİN İNŞAAT MÜHENDİSİ		