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EDUCATION INFRASTRUCTURE FOR RESILIENCE PROJECT

EU FACILITY for SuTP in TURKEY (EU-IPA/2016/382-614)

ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK





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1. INTRODUCTION

The Ministry of National Education (MoNE) received a grant, through signing Grant Agreement (GA) (dated January 27, 2017) with the World Bank (WB) for the implementation of the “Education Infrastructure for Resilience Project” (Project) funded by the Facility for SuTP in Turkey established by the World Bank (WB) European Commission (EC). The Project will be implemented by the Construction and Real Estate Department of the Ministry. The Department will establish a Project Implementation Unit (PIU) that is responsible for day-to-day implementation of the Project and will be supported by several specialized units within the Department itself.

The overall objective is to support the Government of Turkey (GT) maintaining long-term goals in education by responding to the growing demand for access to education among Syrians under Temporary Protection. The specific project development objective is to support the GT to improve access to education of SuTP and host communities by expanding disaster resilient education infrastructure in priority provinces. This objective will be achieved through needs-based investments to increase the number and quality of formal and informal education facilities.

The proposed Project would be implemented through three components: (i) supporting school infrastructure investments; (ii) enhancing quality learning environment; (iii) project management and technical capacity building for infrastructure.

Component 1: Supporting School Infrastructure Investments. The objective of Component 1 is to support enhancing school infrastructure for SuTP. This Component will provide support for construction of priority formal and informal schools and education facilities. Design reviews, soil surveys or other analysis for ground conditions, as well as construction supervision will also be supported under this component. Schools and other education facilities to be constructed will satisfy all current regulations and codes for seismic safety, land use planning, energy efficiency, fire, safety at workplace, etc. as well as all standards related with materials to be used. Building up-to-standards and safe schools will result as avoiding creation of new risks and serve for the purposes of long term risk reduction in school buildings, thus the Project will contribute to Safe Schools agenda in Turkey. New, disaster resilient and modern facilities will also contribute to better learning environment that affects learning abilities of students/trainees positively.

Component 2: Enhancing Quality Learning Environment. The objective of Component 2 is to improve quality of indoors and outdoors in schools to create enhanced learning environment. This Component will provide procurement of equipment and furnishing required to create quality learning environment and to enable flexible use of education facilities for other activities for SuTP. Equipment and furniture support can include, not only all desks and chairs; but also, establishment of laboratories with proper equipment and material for various science and technical courses; language labs with equipment and systems; sports equipment and tools; IT equipment and vocational/skills training materials. Given that



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the education facilities will target a diverse and changing population and may need to be used for teacher-parent meetings and education planning with SuTP and host families, the schools would benefit from flexible furniture (e.g. chairs and tables could be adjusted to different ages and equipment could be on wheels).

Component 3: Project Management, and Technical Capacity Building for Infrastructure. The objective of Component 3 is to support all operational expenses and technical capacity building activities that would be needed for timely and efficient implementation of the project which will be implemented by MoNE's Construction and Real Estate Department who has extensive technical capacity for outsourcing and managing design and construction of schools. The component will support strengthening the Department's staff capacity by hiring experts including but not limited to procurement, financial management, disbursement, monitoring and evaluation, environmental and social safeguards. Monitoring and evaluation will be given special emphasis and the component will support all activities related to data collection, implementation assessments, and evaluations to ensure outcome targets are met. Consultancy services and specific activities for capacity building, equipment and software to implement the project and to monitor and evaluate the results, organization of workshops, trainings and other informative meetings for central and local staff of MoNE will be supported under this component. This Component will also support financing of all communications and visibility activities to be conducted during the lifespan of the Project. The software to be procured by MoNE, inter alia, include a full-fledged information management and monitoring system which enables track of not only contract management and disbursement figures but also to follow-up on the physical progress made on each construction site via visuals, video graphics etc.

The scope of the Project includes; the financing of construction and furnishing of formal and informal education facilities in identified priority provinces and project management and technical capacity building support for infrastructure.





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2. COMPLIANCE WITH WORLD BANK SAFEGUARDS POLICIES

The Environment Law (No. 2872), which was published in Turkish Official Gazette No. 18132 dated August 11, 1983 and revised in Turkish Official Gazette dated May 29, 2013 (Law No. 6486) is Turkey's primary framework for environmental legislation and is supported by a series of regulations. Article 10 of the Environment Law sets the framework for the Regulation on Environmental Impact Assessment, Official Gazette No. 29186 dated November 25, 2014, (henceforth "EIA Regulation"). The World Bank's environmental and social safeguards policies require that the borrower country perform an Environmental Assessment Study, integrated with the EIA Regulation and WB's Operational Policy for Environmental Assessment (OP 4.01).

Construction of schools are not listed in Turkish EIA Regulation. Due to that reason, projects are exempted from the EIA Process. Therefore, this Environmental and Social Action Plan (ESAP) has been prepared to fulfill the requirements of WB Operational Policies on Environmental Assessment (OP 4.01), and Physical Cultural Resources (OP4.11). The purpose of this plan is also to assist the Project Management Teams in screening all the subprojects for their likely social and environmental impacts, identifying E&S management requirements and prioritizing investments.

OP 4.01 Environmental Assessment:

Simple construction works triggers OP 4.01 due to anticipated limited environmental and social impacts which will occur within close project boundaries on existing footprints, and will be mostly of a temporary nature. The triggering of OP 4.01 necessitates the preparation of general E&S management and "good housekeeping" instruments. The proposed EU Facility for SuTP project is classified as category 'B' by considering its potential temporary impacts.

Major social and environmental impacts caused by the project are expected on sensitive receptors (e.g. existing schools, hospitals, healthcare centers and houses) located near proposed project sites. In that respect, all project sites and their surrounding areas should be evaluated in terms of sensitive receptors. In some of the proposed locations, demolishing existing school buildings will be deemed necessary due to these buildings being non-compliant with national legislation regarding seismic hazards. Current status and process for such buildings will be provided by MoNE.

Infrastructure projects are subject to varying levels of review that begin while projects are in the development and pre-operation phases. Additional regulations apply to facilities once they are in operation. As part of European Union accession process, several institutional and legislative reforms have been made by Turkey. Because of these reforms, environmental legislations and instruments





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for environmental protection have been aligned with international standards. Those that pertain to construction works include but not limited to the following:

- _ Waste Management Regulation, Official Gazette No. 29314 dated April 2, 2015;
- _ Hazardous Wastes Control Regulation, Official Gazette No. 25755 dated March 14, 2005 and lastly revised in Official Gazette No. 28812 dated November 5, 2013;
- _ Waste Oil Control Regulation, Official Gazette No. 26952 dated July 30, 2008 and revised in Official Gazette No. 28812 dated November 5, 2013;
- _ Vegetable Waste Oil Control Regulation, Official Gazette No. 29378 dated June 6, 2015;
- _ Packaging Waste Control Regulation, Official Gazette No. 28035 dated August 24, 2011;
- _ Waste Batteries and Accumulators Control Regulation, Official Gazette No. 25569 dated August 31, 2004 and lastly revised in Official Gazette No. 28812 dated November 5, 2013;
- _ Medical Waste Control Regulation, Official Gazette No. 25883 dated July 22, 2005 and lastly revised in Official Gazette No. 28948 dated March 21, 2014;
- _ Excavation, Construction and Demolition Waste Control Regulation, Official Gazette No. 25406 dated March 18, 2004 and revised in Official Gazette No.27533 dated March 26, 2010;
- _ Waste Tires Control Regulation, Official Gazette No. 26357 dated November 25, 2006 and lastly revised in Official Gazette No. 29292 and dated March 11, 2015;
- _ Landfill Regulation, Official Gazette No.27533 dated March 26, 2010 and lastly revised in Official Gazette No.29292 dated March 11, 2015;
- _ Communiqué on Recovery of Some Non-Hazardous Wastes, Official Gazette No. 27967 dated June 17, 2011 and revised in Official Gazette No. 29292 dated March 11, 2015;
- _ Regulation on Control of Electrical and Electronic Equipment, Official Gazette No. 28300 dated May 22, 2012;
- _ Regulation on Soil Pollution Control and Contaminated Sites by Point Source, Official Gazette No. 27605 dated June 8, 2010 and revised in Official Gazette No. 28704 dated June 7, 2013;
- _ Water Pollution Control Regulation, Official Gazette No. 25687 dated December 31, 2014;
- _ Regulation on Monitoring of Surface Water and Groundwater, Official Gazette No. 28910 dated February 11, 2014;
- _ Regulation on Protection of Groundwater against Pollution and Deterioration, Official Gazette No: 28257 dated April 07, 2012;
- _ Regulation on Control of Pollution Caused by Hazardous Substances in the Aquatic Environment and Its Surroundings, Official Gazette No. 26005 dated November 26, 2005;
- _ Regulation on Water Intended for Human Consumption, Official Gazette No. 25730 dated February 17, 2005;





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- _ Regulation on Urban Wastewater Treatment, Official Gazette No. 26047 dated January 01, 2006;
- _ Regulation on Assessment and Management of Air Quality, Official Gazette No: 26898 dated June 06, 2008;
- _ Regulation on Minimization of Ozone-Depleting Substances, Official Gazette No. 27052 dated November 12, 2008;
- _ Regulation on Assessment and Management of Environmental Noise, Official Gazette No. 27601 dated June 04, 2010;
- _ Regulation Related to Noise Emissions by Equipment for Outdoor Use, Official Gazette No. 26392 dated December 30, 2006.
- _ The Project will comply with the 6331 numbered Law on Occupational Health and Safety, Official Gazette No.28339, dated June 30, 2012 and its regulations.

In addition to the Environmental Law and its associated regulations, there are several other laws that directly or indirectly include environmental review, and thus, are applicable to the Project. These can be listed as follows:

- _ Groundwater Law (Law No: 167), Official Gazette No. 10688 dated December 23, 1960;
- _ Law on Protection of Cultural and Natural Properties (Law No: 2863), Official Gazette No. 18113 dated July 23, 1983;
- _ Highways Traffic Law (Law No: 2918), Official Gazette No. 18195 dated October 18, 1983;
- _ Regulation on Highway Traffic, Official Gazette No. 23053 dated July 18, 1997;
- _ Regulation on Work Place Establishment and Operating Licenses, Official Gazette No. 25902 dated August 10, 2005;
- _ Regulation on Structures in Disaster Areas, Official Gazette No. 26582 dated July 14, 2007;
- _ Regulation on Buildings Constructions in Earthquake Zones, Official Gazette No. 26454 dated March 06, 2007;
- _ Regulation on the Transportation of Hazardous Substances by Road, Official Gazette No. 28801 dated October 24, 2013;
- _ By-Law on Principles and Procedures Production, Importing, Transportation, Storage, Stocking, Selling, Usage, Assessment of Explosive Materials which are Monopolized, Official Gazette No. 19589 dated September 29, 1987;
- _ Regulation on the Septic Tanks to be installed where a Sewer System is not Available, Official Gazette No. 13783 dated March 19, 1971.





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MoNE has proposed construction of 56 Schools to be funded via this project. Site selection process of these schools is ongoing by MoNE in coordination with State Treasury. The details regarding the eligibility criteria and list of identified education facilities and schools are provided in the Operational Manual of the EU Facility for SuTP Project.

MoNE aims to prioritize the use of lands allocated for the Ministry (determined as education area in the master plan) that belong to the Undersecretariat of Treasury. In some cases, MoNE may have to request land that has already been designated for educational facilities under the master plan from the State Treasury. Majority of the lands are obtained under this process. As of today, location information for 10 of the school sites located in Adana and Kahramanmaraş provinces have been provided by MoNE. Preliminary evaluation of sites through satellite image analysis and desk reviews of available information shows that proposed school sites are mainly located in (or adjacent to) settlement centers which are already under anthropogenic influences. MoNE states that the remaining 46 sites proposed to be selected in the Project have similar land property characteristics. Besides, MoNE will aim to choose existing schools, which have structural problems in accordance to Regulation on Structures in Disaster Areas and Regulation on Buildings Constructions in earthquake Zones. MoNE intends to avoid sites that include sensitive habitats and/or ecologically protected areas during the site selection process. Therefore, no interaction or impact is expected on natural habitats. Being located within settlement centers brings additional advantages to proposed schools in terms of availability of infrastructure such as no need for additional access road or power connection line. Existing sewer systems will be used for wastewater discharges. By considering these characteristics of the sites no major environmental risk is anticipated from the project activities. In this respect, an Environmental Management Plan (EMP) checklist is assumed to be sufficient in order to mitigate and manage the potential impacts of the Project.

OP 4.11, Physical Cultural Resources (PCR): Proposed project sites as well as existing school buildings may be identified as an archaeological or cultural asset that require special protection. Turkish laws, notably Law No. 2863 dated 21.07.1983 on the Protection of Cultural and Natural Assets (revised through the amendment issued on 27.07.2004 dated Official Gazette) and practices are similar the World Bank requirements. The Regulation on Researches, Drillings and Excavations in Relation to the Cultural and Natural Assets, which was published in the Official Gazette No. 18485 dated 10.08.1994 define the procedures and obligations concerning the cultural and natural assets found out during construction. MoNE is responsible to avoid or mitigate impacts on physical or cultural resources of the financed projects. Therefore, MoNE will not proceed with project funding until all requirements of the Turkish legislation are met. Since the national regulations on the conservation of cultural properties are strict, it is not anticipated that any additional requirements would arise WB safeguards





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policies. Nevertheless, a Chance Find Procedure, that will warn supervision consultants and contractors about the steps to be followed in case of a find, including responsibilities for managing accidentally discovered or chance find cultural artifacts will be prepared. Additionally, all relevant official letters will be annexed to the site-specific EMPs. Furthermore, depending on the requirement, a detailed evaluation report on archaeological or cultural asset will be included in the EMPs.

The Project will have positive social benefits as it supports improved access to formal and informal education for school-aged SuTP children through construction of schools (education facilities) in provinces with high density of SuTP. Given that more than 60% of Syrian children at school age are out of education due to the protracted displacement crisis they faced, this project is critical and timely to support resilience of the SuTP families for social cohesion in Turkey. Beyond helping the SuTP families through providing endowments for their children, children from the host communities will also benefit from this project. Given that the schools will be mixed, in order to avoid any potential adverse impacts, MoNE will also consider to have communications and engagement plan to mitigate on possible tensions between host communities and SuTP families. In addition, it is considered within the communication perspective to adequately inform the groups which will be directly affected from the project activities in the project implementation process with an active communication.

OP 4.04, Natural Habitats is not triggered for this project since according to information given by the borrower all the project sites will be located near to settlement centers in the master plan areas. Therefore, the borrower is notified that projects which has impact on any Natural Habitats are defined as ineligible.

OP 4.12, Involuntary Resettlement: The project is unlikely to involve land acquisition as it will be carried out on lands owned by the Public Institutions and designated for the construction of educational facilities. MoNE has selected plots with no ownership issues for the construction of 56 schools that will be funded by the Bank. Thus the project will not trigger the Bank policy on Involuntary Resettlement OP 4.12. MoNE ensures that by project effectiveness: (i) there is no land acquisition in anticipation of this project; (ii) there are no squatters/users on public land that is used; (iii) there are no OP 4.12 issues on land acquired previously which is then used for the project.

In general, acquisition through expropriation is not realized very often by MoNE. According to the prevailing laws of MONE, if there is a plot designated for education facilities under the zoning plan the land is allocated to MONE by law. Expropriation is a last resort and especially the enforcement of Article 27 on Urgent Expropriation is not generally put into practice. When MoNE requires land for new schools, Ministry owned school gardens may be considered. Majority of the lands are obtained under this process. Shall there be a need to acquire other lands through expropriation, zoning plans





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prepared by municipalities are taken into consideration and lands allocated for educational facilities are identified. MoNE follows Expropriation Law numbered 2942 to acquire such properties.

With regards to the Project, MoNE has started to provide the Bank with a list of land plots according to a priority list of 56 schools in 12 provinces. The lists include annexures such as title deeds, aerial photographs, relevant decisions or permits applicable to the selected plots to ensure that the ownership status of the land is suitable for construction and in line with both national legislation and Bank requirements. MoNE recently visited and verified the plots in several provinces to be clean.

The Bank has started its due diligence including screenings/rapid assessments of 10 education facilities in 2 provinces which are considered as priority investments. The Bank will continue its due diligence in the remaining education facilities of the selected 56 school plots through a piecemeal approach during implementation to ensure that there is no non-compliance with WB OP 4.12.

Prior to the start of civil works, as part of due diligence process, MONE will fill out the land acquisition checklist (provided as Annex 2) and enclose all relevant annexes for each plot, and send them for Bank approval. This checklist will be filled for each subject plots and filed to justify that there are no prevailing conditions to trigger OP 4.12, all plots are public land and allocated for MONE. The land plots will also be reviewed if there was a recent land take in anticipation of the project that had any issues that lead to OP 4.12. Any land (designated for building schools) that involves involuntary land acquisition that will trigger OP 4.12 will not be eligible for financing. For such cases, all civil construction works planned will be executed on other alternative sites that the borrower will provide and confirm which do not require acquisition and are not occupied or being used for economic activities that will trigger OP 4.12. The checklist will provide general information such as ownership details and physical status of the plot. In cases where the subject land plot is privately owned and triggers OP 4.12, MONE will find alternative plots that are clear of any land acquisition requirement and ensure that there are no ongoing land acquisition issues or expropriation process as well as having no users/squatters on selected public lands.

The due diligence will be concluded once all designated plots are approved by the Bank ensuring that there are no social safeguard issues. Due to the nature of the Project, it is important that there is a visibility and communications strategy in place. During implementation, to avoid any negative feedback or misunderstanding from the host communities, MoNE will have a good communications strategy for both the SuTP and host communities. Visibility and engagement activities with both communities will be conducted through communication tools that will be prepared in both languages (Turkish and Arabic) to ensure potential beneficiaries (parents, teachers, students etc.) to easily engage and be informed about the Project. As a good practice, it is suggested that MoNE provide leaflets or other informative documents to inform communities on the new schools that will be constructed.





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Prior to construction, MoNE will also set up sign boards/posters with relevant information of project, contact details of MoNE for any grievances or questions that might arise from the communities. This will allow all potential beneficiaries and host communities to be informed of the Project, its construction activities and related environmental and social impacts and mitigation measures. Additionally, public consultation meetings both to inform and ensure involvement of host communities and potential beneficiaries will be held. Potential environmental and social impacts will also be discussed with the public during these meetings. MoNE will be encouraged to seek coordination with the community outreach programs of other services providers to also enhance citizen engagement. More broadly, community engagement will be sought through timely information events and local level grievance redress mechanisms will be set up to resolve concerns as they arise. Both information and grievance mechanisms will consider the different needs and concerns of men and women as well as local and SuTP communities.

MoNE will have a grievance mechanism in place to resolve and administer the grievances that could be encountered during the construction of school buildings as well as to address other social issues pertaining to social cohesion and integration once the schools are operational. Host communities may have concerns regarding the inclusion of SuTP in the mixed school system that will be adapted in the new schools. Similarly, the mechanism will allow SuTP to express their concerns and requests. In order to be able to facilitate the needs of both communities the grievance mechanism shall be launched in both languages; Turkish and Arabic. MoNE shall design the grievance mechanism enabling to be reached by the target groups directly as well as disseminating information regarding the grievance mechanism in both languages (Turkish and Arabic). In addition, the grievance mechanism will receive not only the comments and notification of the target groups but also the feedback about action and result for solution. In this frame, all applications to the grievance mechanism will be registered and relevant persons will be notified about attempts and improvements for solution. The effectiveness of the grievance mechanism will be monitored with the indicators defined in this area.





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3. GUIDELINES FOR PREPARATION OF THE ENVIRONMENTAL AND SOCIAL MANAGEMENT PLAN

This Environmental and Social Management Framework (ESMF) was prepared by MoNE to describe the implementation arrangements for safeguarding full compliance of the project with WB environment and social safeguards requirements and national laws and regulations. The ESMF will be disclosed by MoNE and WB on their websites.

This ESMF includes guidance to construction contractors and construction supervision consultants who will be responsible for preparing site specific environmental management plans/checklists (EMPs) before any civil works begin. Sample EMP checklist is provided in ANNEX 1.. The sample EMP checklist will be detailed enough to be used as a guidance document during the assessment of potential impacts.

For low-risk construction projects, an alternative approach has been developed by World Bank safeguard teams. With this approach, it aimed to provide an opportunity for a more streamlined approach to mainstreaming the World Bank's environmental safeguards requirements into projects which (a) are small in scale or by the nature of the planned activities have a low potential environmental impact, (b) are located in countries with well-functioning country systems for environmental assessment and management. The checklist-type format has been developed to ensure that basic good practice measures are recognized and implemented, while designed to be both user friendly and compatible with the World Bank's safeguards requirements. The intention of this checklist is that it offers practical, concrete and implementable guidance to contractors and supervising engineers for simple civil works contracts. It should be completed during the final design phase and, either freestanding or in combination with any environmental documentation produced under national law (e.g. EIA reports), constitute an integral part of the bidding documents and eventually the works contracts.

The EMP checklist attempts to cover typical core mitigation approaches to civil works contracts with small, localized impacts. It is accepted that this format provides the key elements of an EMP to meet World Bank Environmental Assessment requirements under OP 4.01. The intention of this checklist is that it would be applicable as guidelines for the small works contractors and constitute an integral part of bidding documents for contractors carrying out small civil works under Bank-financed projects.

The checklist has three sections:

- **Part 1** includes a descriptive part that characterizes the project and specifies in terms the institutional and legislative aspects, the technical project content, the potential need for capacity building program and description of the public consultation process. This section





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could be up to two pages long. Attachments for additional information can be supplemented when needed.

- **Part 2** includes an environmental and social screening checklist, where activities and potential environmental issues can be checked in a simple Yes/No format. If any given activity/issue is triggered by checking “yes”, a reference is made to the appropriate section in the following table, which contains clearly formulated management and mitigation measures.
- **Part 3** represents the monitoring plan for activities during project construction and implementation. It retains the same format required for EMPs proposed under normal Bank requirements for Category B projects. It is the intent of this check-list that Part 2 and Part 3 be included into the bidding documents for contractors, priced during the bidding process and diligent implementation supervised during works execution.

The EMPs will also cover the scope of the social safeguards as the project will have a land acquisition process. Prior to the bidding process of the civil works for each subproject, the PIU will fill out a land acquisition checklist for each plot which will include all relevant complementary documents as an annex. A template for the Land Acquisition Checklist is provided in Annex 2. The due diligence studies will be concluded once all designated plots are approved by the Bank ensuring that there are no social safeguard issues. The details regarding the land acquisition process and social due diligence studies are provided in the Operational Manual of the EU Facility for SuTP Project.





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4. SITE ALTERNATIVES

MoNE has conducted the site selection process of proposed 56 schools. In addition to these existing schools; Treasury owned lands, already dedicated to school construction in master plans, are chosen as proposed school sites. MoNE states that all available sites are identified as proposed sites for this project. Therefore, no alternative site analysis was performed by MoNE





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5. ENVIRONMENTAL AND SOCIAL MONITORING AND GRIEVANCE MECHANISM

Environmental and Social Monitoring

Although the environmental and social impacts of the Project are expected to be quite low; an environmental and social monitoring system, which will be active from the implementation phase to operational phase of the Project, will prevent negative impacts of the Project and monitor the effectiveness of the mitigation measures. This system helps the WB and the borrower to evaluate the success of mitigation as part of project supervision, and allows taking an action when needed. Both the environmental and social issues covered within the mitigation measures will be monitored and supervised by the appointed specialists through MoNE.

The monitoring system provides,

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

The PIU will regularly collect data for results indicators from the field through its provincial directorates and by making routine site visits. The PIU will also be responsible of monitoring the quality of data collected, and will evaluate the achieved outputs/outcomes vis-à-vis the those set by the Results Framework. The details of the results framework are provided in the table given in Section 3.10 of the Operational Manual of the EU Facility for SuTP Project.

Grievance Redress Mechanism

The Grievance Redress Mechanism (GRM) is a process that enables any stakeholder to submit a complaint or a suggestion about how the project is being planned, constructed or implemented. Within the project communication strategy, naming which is understandable for the target group and definition of “Information Call Center” for having similar characteristics with the other available grievance redress mechanisms in Turkey. The definition of “Information Call Center” will be used to facilitate communication and engagement in the project implementation process. MoNE will establish a transparent and comprehensive GRM before Project implementation. This GRM system will be the primary communication channel to receive the affected communities’ (both the host and SUTP communities) concerns, queries, complaints and grievances and follow the solution pertaining the environmental and social issues that they may face during the construction of school buildings. Following to the call center operator conveys the queries and grievances received through the call center to the Project Implementation Unit, the communicated person will be informed about the actions taken for the received queries and grievances. In the grievance redress process, an issue tracking algorithm will be established and the feedback of process will be made in the coordination of the Project Implementation Unit.





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The means to be used by MoNE for announcing the service of “Information Call Center” to the target group have been determined in the communication strategy and are listed below.

- Leaflets and Posters,
- Notice Boards,
- MoNE-Project Website
- Local Events (Opening Meeting, groundbreaking ceremony etc.)
- Social Media Tools
- Telecommunication Tools.

During the project implementation process, grievances will be addressed at three levels; (i) Contractor level, (ii) provincial level at MoNE; and (iii) National Level at the PIU of MoNE. Details about the grievance mechanism will be specified in the operational manual. The Grievance Mechanism (sometimes also called Grievance Procedure) will be prepared according to WB policies.

Although there is no obligation, a Public Grievance Form has been prepared for convenience. All the received complaints, concerns and suggestions will be archived and solved within a reasonable timeframe. A database for all kind of received grievances will be logged and kept by the contractor. The statistics of the grievances should be reported to the WB regularly. A sample of grievance form and a grievance closeout form are provided in Annex 3 to be prepared by the PIU.



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6. IMPLEMENTATION ARRANGEMENTS AND RESPONSIBILITIES

A project implementation unit (PIU) was established under the Construction and Real Estate Department of MoNE for the implementation of the project. The organigram of the PIU is provided in Figure 1.

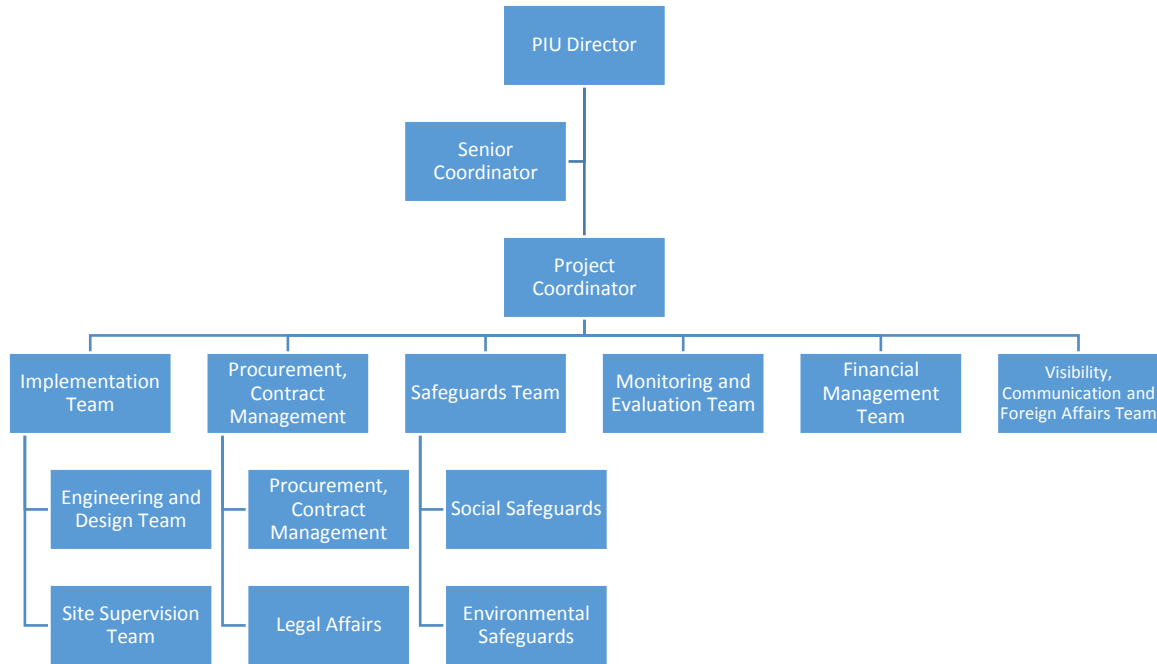


Figure 1: Organogram of the PIU

PIU will make site specific evaluation for each of proposed projects in accordance to national legislation as well as WB Safeguard Policies to understand effectiveness of the EMP checklist. Moreover, PIU will guide the construction contractors as well as the supervision engineering consultants for the preparation of site specific EMPs, and assist them during the implementation of the roles and responsibilities listed in Table 1.

Table 1 also includes responsibility distribution of all parties involved in the Project.

The awarded contractor will be responsible for the preparation of site specific EMPs and setting up and managing the Grievance Mechanism. PIU will guide and assist the construction contractors and supervision engineering consultants for the preparation of site specific EMPs and EMP checklists. The preparation and implementation of EMPs is expected to cost only a small fraction of design and construction cost, as most mitigation measures will be very generic, off-the-shelf, and implementable without specialized skills, experience or equipment. Moreover, it is assumed that the cost is covered in the bid proposals.



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MoNE will be responsible for the review of all documents and the quality of the site specific EMPs. MoNE will submit site specific EMPs to WB for prior review and when both the WB and the Borrower are confident that MoNE has demonstrated that the process is accurate, WB will transfer this prior review to post review.

The details of the tasks to be implemented are given in the Operational Manual of the EU Facility for SuTP Project.

Table 1: Roles and Responsibilities

Responsible Party	Responsibilities
World Bank	<ul style="list-style-type: none"> to review the EMPs and provide no objections to MoNE to conduct implementation support missions in order to ensure that the Project is in compliance with WB Ops to disclose ESMF on WB's official website
Contractors	<ul style="list-style-type: none"> to implement EMPs on site, if required can revise the EMP together with the Construction Supervision Consultant to welcome and apply the relevant laws and regulations that are introduced by MoNE, in discussion with WB and included in the tender documents to develop site specific EMPs/checklists before any civil works begin to develop Chance Find Procedure if required to manage the grievance mechanism to monitor site activities regular (daily, weekly monthly etc.) basis as defined in Site Specific EMPs. to prepare the EMP progress reports for the review of MoNE.
Construction Supervision Consultants	<ul style="list-style-type: none"> to conduct the initial project site assessment to develop the site specific EMPs to monitor/assess the contractor's activities in compliance with the EMP to give feedback and notice to the MoNE
Communication Specialist (hired by the PIU)	<ul style="list-style-type: none"> to prepare, implement and monitor the Communications Strategy of the Project. to prepare all communication and visibility tools (i.e brochures, leaflets, banners, posters, meeting announcements etc.) that will be used to inform host communities and SuTPs in each sub-project site oversee the process for the translation, printing and dissemination of the communication/visibility tools as well as planning and organization of public events and consultation meetings with Project beneficiaries to prepare periodic reports on all communication and visibility activities realized under the Project to the PIU to be submitted to the Bank as a part of the monitoring process
Monitoring Specialist (appointed by the MoNE)	<ul style="list-style-type: none"> to monitor and supervise both the environmental and social issues covered within the mitigation measures by the appointed specialist through MoNE
MoNE/PIU	<ul style="list-style-type: none"> to ensure the utilization of the entire grant amount to conduct the site selection process of the Project and to deliver the site to the contractor to avoid or mitigate impacts on physical or cultural resources of the financed projects to develop communication and engagement plan fill out the land acquisition checklist for each plot and submit it to the WB for approval to provide leaflets or other informative documents to inform communities to set up sign boards/posters with relevant information about project to organize public consultation meetings to seek coordination with the community outreach programmes of service contractors to set up a local level GRM to recruit both Turkish and Arabic community liaison officers to implement Operational Manual (together with EMSF) and disclose the safeguards document on MoNE's official website to appoint specialist for the environmental and social monitoring the quality is checked and the EMPs are reviewed to submit the EMPs to the WB for prior review. It should be noted that after prior review of selected number of EMPs WB and MoNE can implement post review arrangements for EMP reviews based on mutual agreement. to make site specific evaluation for each proposed project in line with the National Regulations and WB OPs to guide the construction contractors and supervision engineering consultants to disclose the ESMF and include the ESMF in the bidding documents. In the ESMF, to provide sample EMP checklist available for the construction contractors and supervision engineering consultants as a part of tender documents Responsible for compliance of the project with national environmental regulations, as well as the WB environmental and social safeguards policies to perform supervision of EMP implementation by the construction contractor and document performance, recommendations and any further actions required as part of overall project supervision. to summarize the environmental and social issues related to project implementation to WB in regular progress reports



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Responsible Party	Responsibilities
	<ul style="list-style-type: none">• to be open to comments from affected groups and local environmental authorities regarding environmental aspects of project implementation. Meet with these groups during site visits, as necessary• to coordinate and liaise with WB supervision missions regarding environmental and social safeguard aspects of project implementation.• to enforce the contractor in case of an incompliance and notify the WB about the incompliance





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The PIU is also responsible for maintaining internal and external liaison of the Project with diverse institutions. This includes establishing a Steering Committee (SC) composed of the MoNE, AFAD, World Bank, European Union Delegation to Turkey and Government representatives deemed necessary by the Recipient. The nature and flow of responsibilities of the PIU vis-à-vis different actors is provided in Figure 2.

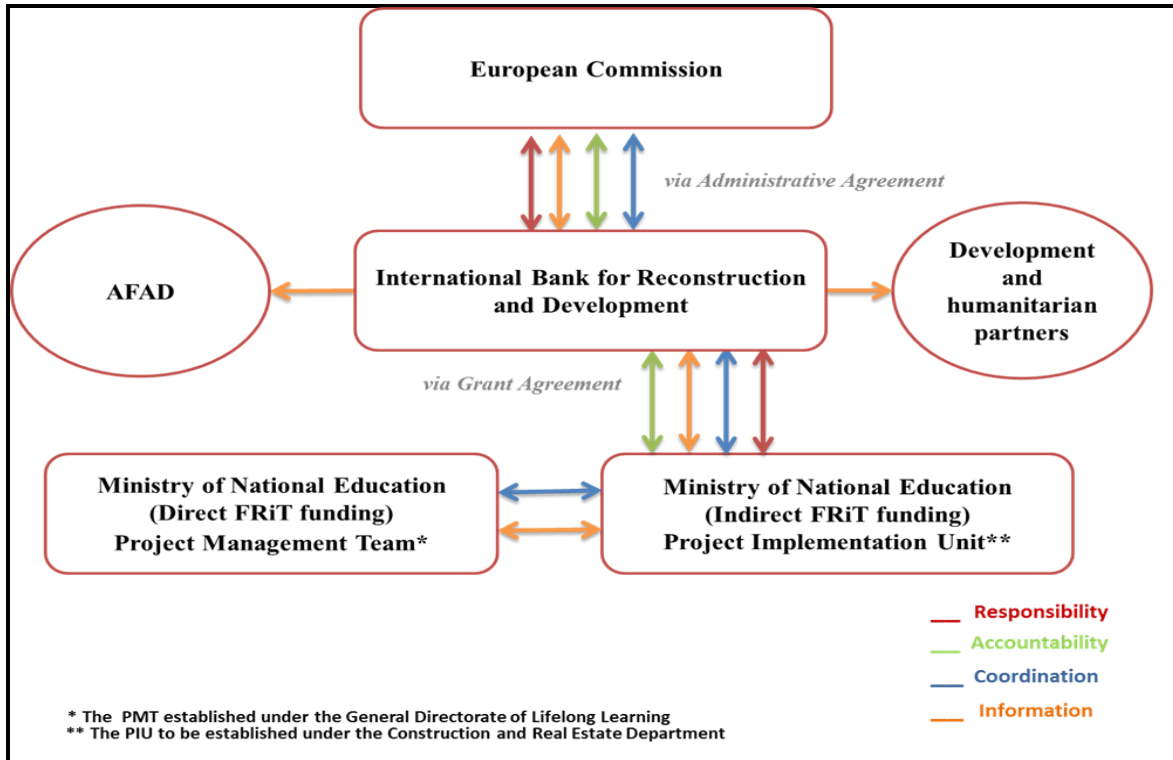


Figure 2: Liaison Scheme

In addition to the responsibilities listed above, each party will prepare monthly and/or weekly reports to their relevant different authorities. The PIU will also be responsible for summarizing the environmental and social issues related to project implementation to WB in regular progress reports. The detailed list of all reporting requirements is presented in



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Table 2: Summary of Reporting Requirements

Responsible Party	Reporting Requirement
PIU	<ul style="list-style-type: none"> • Submission of the quarterly Project information notes (PIN) in a timely manner to the Bank in line with the Bank’s time schedule to transmit the PINs to the EUD. • Preparation of the Project Progress Reports (PPR) semiannually to demonstrate the progress made during the reporting period against the results framework developed and target values identified in a clear and tangible manner.
Engineering Consultants	<ul style="list-style-type: none"> • Preparation of Monthly Monitoring reports for the review of MoNE.
MoNE/PIU	<ul style="list-style-type: none"> • Summarizing the environmental and social issues related to project implementation to WB in regular progress reports. • Preparation of Monitoring Reports to the WB every six months before WB task team site visits.
Construction Contractor Supervision Engineering Consultants	<ul style="list-style-type: none"> • Preparation of EMP progress reports for the review of MoNE.



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7. SCHEDULE

The preparation of the site specific EMPs (in the form of checklists) would require an estimated time period of about 1 month for each site. This period also includes MONE's review (and WB's review and approval for the projects subject to prior approval) and disclosure.





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8. PUBLIC CONSULTATION

ESMF will be one of the topics discussed during the information meeting arranged in the project implementation process. MoNE will organize the meeting and invite participants. The ESMF will be presented to inform stakeholders about the project, its potential environmental and social impacts, and mitigation/monitoring arrangements accordingly. In this point, the objective is that the stakeholders learn this approach and the availability of mechanism established within the scope of ESMF rather than updates for the context of ESMF and offer suggestions.





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ANNEX 1: EMP SUB-PROJECT EMP CHECKLISTS¹

INSTITUTIONAL & ADMINISTRATIVE	
Country	Turkey
Project title	
Scope of project and activity	
SITE DESCRIPTION	
Name of site	
Describe site location	Attachment 1: Site Map []Y [] N
Who owns the land?	
Description of geographic, physical, biological, geological, hydrographic and socio-economic context	
Locations and distance to nearest sensitive receptors such as hospitals, health care units, schools, houses?	
Locations and distance for material sourcing, especially	

¹ The checklists contained in this annex point out main impacts and mitigation measures, but are not meant to be exhaustive in their coverage. Impact assessment and mitigation planning must be tailored to each individual subproject. Furthermore, not all of the issues identified in this Annex may apply to all projects. In particular, rehabilitation subprojects may entail only some of the issues.



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aggregates, water, stones?	
LEGISLATION	
Identify the infrastructures used by the project such as sewer system, electricity, water network etc.	
Identify national & local legislation & permits that apply to project activity (i.e. 1/1000 or 1/5000 scaled master plan arrangements, construction permit building permit etc.)	
PUBLIC CONSULTATION	
Identify when / where the public consultation process took place	EMP Checklist document will be made publicly available at the construction site offices and the site manager will be responsible for recording and answering any questions/comments raised by public.
INSTITUTIONAL CAPACITY BUILDING	
Will there be any capacity building?	<input type="checkbox"/> N or <input type="checkbox"/> Y



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PART 2: SAFEGUARDS INFORMATION

ENVIRONMENTAL /SOCIAL SCREENING			
	Activity	Status	Triggered Actions
Will the site activity include/involve any of the following??	A. Building rehabilitation	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section A below
	B. Minor new construction	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section A below
	C. Individual wastewater treatment system	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section B below
	D. Historic building(s) and districts	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section C below
	E. Acquisition of land ²	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section D below
	F. Hazardous or toxic materials ³	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section E below
	G. Impacts on forests and/or protected areas	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section F below
	H. Handling / management of medical waste	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section G below
	İ. Traffic and Pedestrian Safety	<input type="checkbox"/> Yes <input type="checkbox"/> No	See Section H below

² Land acquisitions includes displacement of people, change of livelihood encroachment on private property this is to land that is purchased/transferred and affects people who are living and/or squatters and/or operate a business (kiosks) on land that is being acquired.

³ Toxic / hazardous material includes but is not limited to asbestos, toxic paints, noxious solvents, removal of lead paint, etc.



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PART 3: MITIGATION MEASURES

ACTIVITY	PARAMETER	MITIGATION MEASURES CHECKLIST
0. General Conditions	Notification and Worker Safety	<ul style="list-style-type: none"> (a) The local construction and environment inspectorates and communities have been notified of upcoming activities (b) The public has been notified of the works through appropriate notification in the media and/or at publicly accessible sites (including the site of the works) (c) All legally required permits have been acquired for construction and/or rehabilitation (d) The Contractor formally agrees that all work will be carried out in a safe and disciplined manner designed to minimize impacts on neighboring residents and environment. (e) Workers' PPE will comply with Turkish Legislation (always hardhats, as needed masks and safety glasses, harnesses and safety boots) (f) Appropriate signposting of the sites will inform workers of key rules and regulations to follow.
A. General Rehabilitation and /or Construction Activities	Air Quality	<ul style="list-style-type: none"> (a) In case demolition, debris-chutes shall be used above the first floor (b) Demolition debris shall be kept in controlled area and sprayed with water mist to reduce debris dust (c) In case pneumatic drilling during excavation dust shall be suppressed by ongoing water spraying and/or installing dust screen enclosures at site (d) The surrounding environment (sidewalks, roads) shall be kept free of debris to minimize dust (e) There will be no open burning of construction / waste material at the site (f) There will be no excessive idling of construction vehicles at sites
	Noise	<ul style="list-style-type: none"> (a) Noise during demolishing and construction will be limited to restricted times agreed to in the permit (b) During operations, the engine covers of generators, air compressors and other powered mechanical equipment shall be closed, and equipment placed as far away from residential areas as possible
	Water Quality	<ul style="list-style-type: none"> (g) 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 streams and rivers.



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	Waste management	<p>(a) Waste collection and disposal pathways and sites will be identified for all major waste types expected from demolition and construction activities.</p> <p>(b) Mineral construction wastes will be separated from general refuse, organic, liquid and chemical wastes by on-site sorting and stored in appropriate containers.</p> <p>(c) Construction waste will be collected and disposed properly by licensed collectors</p> <p>(d) The records of waste disposal will be maintained as proof for proper management as designed.</p> <p>(e) Whenever feasible the contractor will reuse and recycle appropriate and viable materials (except asbestos)</p>
B. Individual wastewater treatment system	Water Quality	<p>(a) The approach to handling sanitary wastes and wastewater from building sites (installation or reconstruction) must be approved by the local authorities</p> <p>(b) Before being discharged into receiving waters, effluents from individual wastewater systems must be treated in order to meet the minimal quality criteria set out by national guidelines on effluent quality and wastewater treatment</p> <p>(c) Monitoring of new wastewater systems (before/after) will be carried out</p> <p>(d) Construction vehicles and machinery will be washed only in designated areas where runoff will not pollute natural surface water bodies.</p>
C. Historic building(s)	Cultural Heritage	<p>(a) If the building is a designated historic structure, very close to such a structure, or located in a designated historic district, notification shall be made and approvals/permits be obtained from local authorities and all construction activities planned and carried out in line with local and national legislation.</p> <p>(b) It shall be ensured that provisions are put in place so that artifacts or other possible “chance finds” encountered in excavation or construction are noted and registered, responsible officials contacted, and works activities delayed or modified to account for such finds.</p>
D. Acquisition of land	Land Acquisition and Resettlement Policy Plan/Framework	<p>(a) If expropriation of land was not expected but is required, or if loss of access to income of legal or illegal users of land was not expected but may occur, that the Bank’s Task Team Leader shall be immediately consulted.</p> <p>(b) The approved Land Acquisition and Resettlement Policy Plan/Framework (if required by the project) will be implemented</p>
E. Toxic Materials	Asbestos management	<p>(a) If asbestos is located on the project site, it shall be marked clearly as hazardous material</p>



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		<p>(b) When possible the asbestos will be appropriately contained and sealed to minimize exposure</p> <p>(c) The asbestos prior to removal (if removal is necessary) will be treated with a wetting agent to minimize asbestos dust</p> <p>(d) Asbestos will be handled and disposed by skilled & experienced professionals</p> <p>(e) If asbestos material is being stored temporarily, the wastes should be securely enclosed inside closed containments and marked appropriately. Security measures will be taken against unauthorized removal from the site.</p> <p>(f) The removed asbestos will not be reused</p>
	Toxic / hazardous waste management	<p>(a) Temporarily storage on site of all hazardous or toxic substances will be in safe containers labeled with details of composition, properties and handling information</p> <p>(b) The containers of hazardous substances shall be placed in a leak-proof container to prevent spillage and leaching</p> <p>(c) The wastes shall be transported by specially licensed carriers and disposed in a licensed facility.</p> <p>(d) Paints with toxic ingredients or solvents or lead-based paints will not be used</p>
F. Affected forests, wetlands and/or protected areas	Protection	<p>(a) All recognized natural habitats, wetlands and protected areas in the immediate vicinity of the activity will not be damaged or exploited, all staff will be strictly prohibited from hunting, foraging, logging or other damaging activities.</p> <p>(b) A survey and an inventory shall be made of large trees near the construction activity, large trees shall be marked and cordoned off with fencing, their root system protected, and any damage to the trees avoided</p> <p>(c) Adjacent wetlands and streams shall be protected from construction site run-off with appropriate erosion and sediment control feature to include by not limited to hay bales and silt fences</p> <p>(d) There will be no unlicensed borrow pits, quarries or waste dumps in adjacent areas, especially not in protected areas.</p>
G. Disposal of medical waste	Infrastructure for medical waste management	<p>(a) In compliance with national regulations the contractor will insure that health care facilities include sufficient infrastructure for medical waste handling and disposal; this includes and not limited to:</p> <ul style="list-style-type: none"> Special facilities for segregated healthcare waste (including soiled instruments “sharps”, and human tissue or fluids) from another waste disposal; and



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		<ul style="list-style-type: none"> • Appropriate storage facilities for medical waste are in place; and • If the activity includes facility-based treatment, appropriate disposal options are in place and operational
H Traffic and Pedestrian Safety	Direct or indirect hazards to public traffic and pedestrians by construction activities	<p>(b) In compliance with national regulations the contractor will insure that the construction site is properly secured and construction related traffic regulated. This includes but is not limited to</p> <ul style="list-style-type: none"> • Signposting, warning signs, barriers and traffic diversions: site will be clearly visible and the public warned of all potential hazards • Traffic management system and staff training, especially for site access and near-site heavy traffic. Provision of safe passages and crossings for pedestrians where construction traffic interferes. • Adjustment of working hours to local traffic patterns, e.g. avoiding major transport activities during rush hours or times of livestock movement • Active traffic management by trained and visible staff at the site, if required for safe and convenient passage for the public.



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PART 4: MONITORING PLAN

Phase	What (Is the parameter to be monitored?)	Where (Is the parameter to be monitored?)	How (Is the parameter to be monitored?)	When (Define the frequency / or continuous?)	Why (Is the parameter being monitored?)	Cost (if not included in project budget)	Who (Is responsible for monitoring?)
During activity preparation (pre-construction)							
During activity implementation (construction)							



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Annex 2: LAND ACQUISITION CHECKLIST

PART 1 – GENERAL INFORMATION		
Location of the Subject Plot		
Province		
District		
Quarter		
Plot/Parcel Number		
Ownership Status		
State Treasury <input type="checkbox"/>	Other Public <input type="checkbox"/>	State Treasury + Other Public <input type="checkbox"/>
Other Information		
Type of land (indicated on master plan)		
Already in use for educational purposes	<input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes;		
Active school facility	<input type="checkbox"/> Yes <input type="checkbox"/> No	
Number of students		
Any decision for demolishing existing education facilities	<input type="checkbox"/> Yes <input type="checkbox"/> No	

ANNEXES

1. Copy of title deed
2. Satellite image (if any)
3. Photo of plot and surroundings
4. Other documents (if there is any demolishing decision for existing education facilities)



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Annex 3: SAMPLE OF GRIEVANCE FORM

Reference No	
Full Name	
Please mark how you wish to be contacted (mail, telephone, e-mail).	Please mark how you wish to be contacted
Province/Town/Settlement	
Date	
Category of the Grievance	
1. On abandonment (public housing)	
2. On assets/properties impacted by the project	
3. On infrastructure	
4. On decrease or complete loss of sources of income	
5. On environmental issues (ex. pollution)	
6. On employment	
7. On traffic, transportation and other risks	
9-Other (Please specify):	
Description of the Grievance What did happen? When did it happen? Where did it happen? What is the result of the problem?	
What would you like to see happen to resolve the problem?	

Signature:

Date:





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SAMPLE OF GRIEVANCE CLOSEOUT FORM

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

COMPENSATION AND FINAL STAGES

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

Notes: Name-Surname and Signature

Date / /

Of the Complainant:

Representative of the Responsible Institution/Company

Title-Name-Surname and Signature

