

**Small and Medium Enterprises Development
Organization of Türkiye**



Türkiye Green Industry Project

(The World Bank Project ID - P179255)

**Environmental and Social
Management System**

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Definitions and Abbreviations

i. Abbreviations

CBAM	Carbon Border Adjustment Mechanism
CIMER	Presidency's Communication Center
CoC	Code of Conduct
E&S	Environmental and Social
EHS	Environmental, Health, and Safety
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard
EU	The European Union
F-gases	Fluorinated Gases
GIIP	Good International Industry Practice
GRM	Grievance Redress Mechanism
IPF	Investment Project Financing
ISO	International Organization for Standardization
KOSGEB	Small and Medium Enterprises Development Organization of Türkiye
KPI	Key Performance Indicator
LMP	Labor Management Procedure
MoIT	Ministry of Industry and Technology
MoENR	Ministry of Energy and Natural Resources
MoEUCC	Ministry of Environment, Urbanization and Climate Change
MoTF	Ministry of Treasury and Finance
NGO	Non-Governmental Organizations
ODS	Ozone-Depleting Substances
OHS	Occupational Health and Safety
PDO	Project Development Objective
PIU	Project Implementation Unit
R&D	Research and Development
RCA	Root Cause Analysis
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SME	Small and Medium-Sized Enterprise
TÜBİTAK	Scientific and Technological Research Council of Türkiye
TSE	Turkish Standards Institution

ii. Definitions

Contamination	The presence of a non-natural compound in soil or water, or unwanted compound in chemicals or other mixtures.
Disadvantaged or Vulnerable Groups	Disadvantaged or vulnerable refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits.
Environmental Incident	Unplanned events or conditions on site that detrimentally impact the soil, surface water, groundwater, vegetation, fauna, air quality, or ambient noise, in a manner that contravenes any environmental procedures.
Environmental Nuisance	Any unreasonable interference to an environmental value by noise or air/water contaminants.
Grievance Mechanism	A grievance mechanism is a formal complaint process that can be used by individuals, workers, communities and/or civil society organisations that are being negatively affected by certain business activities and operations.
Pollution	The man-made or man-induced alteration of the chemical, physical, biological and radiological integrity of water.
Pollution Prevention	The set of precautions and activities of an organization, which are directed towards minimizing the amount of pollution, which might result of an activity, production or service process.
Stakeholder Engagement	A continuous process in which the Project builds and maintains constructive and sustainable relationships with stakeholders impacted over the life of a project. It includes a range of activities and interactions over the life of the project such as stakeholder identification and analysis, information disclosure, stakeholder consultation, negotiations and partnerships, grievance management, and reporting to stakeholders and management functions.
The Project	Refers to Türkiye Green Industry Project (P179255).
Waste	Any effluent or unwanted substance that needs to be disposed of.
Wastewater	Refers to all liquid wastes that have the potential to cause ground and surface water pollution.
Water Quality	Term used to describe the chemical, physical, and biological characteristics of water, usually in respect to its suitability for a particular purpose.

1 Introduction

One of the mandatory documents to be prepared for the Türkiye Green Industry Project (hereinafter referred to as “the Project”) is the Environmental and Social Management System (ESMS). The ESMS of the Project has been prepared in accordance with the relevant national legislation, the Environmental and Social Standards (ESSs) of the World Bank Environmental and Social Framework (ESF) and the relevant Good International Industry Practice (GIIP).

KOSGEB is required to develop and maintain an effective ESMS and set out how E&S risks and impacts associated with the Project will be assessed and managed. ESMS also promotes good environmental and social management practices.

ESMS examines the overall risks and impacts of the Project and determines the comprehensive E&S management approach to be adopted to address the potential E&S impacts. ESMS complies with World Bank ESF and appropriate national legislation. KOSGEB puts in place and maintains this ESMS to identify, assess, manage, and monitor the E&S risks and impacts of the Project on an ongoing basis. The ESMS will be commensurate with the nature and magnitude of E&S risks and impacts of the Project.

1.1 Project Description

To produce high-value-added goods domestically and boost the Türkiye’s competitiveness globally, green industrialization is seen as being crucial. This is because it will increase industry efficiency by enhancing the capacity for renewable energy and the circular economy.

The Project Development Objective (PDO) is to support a sustainable and efficient green transformation and growth for industrial firms in Türkiye. The project aims to support industrial exporters to align with new requirements in export markets (e.g., CBAM, the Green Deal, the circular economy action plan, EU product directives), and for Turkish industrial firms to be better connected to green global value chains, develop new green products, and be better equipped to adapt to climate change impacts and adopt relevant mitigation solutions. The Project will support manufacturing firms to use resources more efficiently and innovate in their management, production process, and/or products to meet future market demand.

KOSGEB will be a direct Borrower and implementing agency of the Component 1. TÜBİTAK will be a direct Borrower and implementing agency of the Component 2. Ministry of Industry and Technology (MoIT) will be a direct Borrower and implementing agency of the Component 3. Each institution (KOSGEB, TÜBİTAK and MoIT) will undertake stakeholder engagement activities with the target groups based on their specific roles in the overall project. Ministry of Treasury and Finance (MoTF) will guarantee the repayment obligations of the Borrowers in respect to the Loan Agreement.

Key results of the Project are summarized as follows:

- Increase in the efficiency of electricity use by beneficiary firms (total electricity consumption/total output, %);
- Increase in the efficiency of water use by beneficiary firms (total water consumption/total output, %);
- Decrease in the uncirculated waste of beneficiary firms (share of total waste, %);
- Private sector investment mobilized in green technologies (US\$); and
- Number of innovative green efficiency solutions introduced by supported beneficiary firms (number).

The Project will comprise three components as described below.

Component 1: Support manufacturing SMEs improve their energy and resource performance and reduce their carbon emissions.

The component will support manufacturing SMEs in adopting green transition plans to improve their resource efficiency (with a focus on electricity, water, and waste management efficiency). The component will raise the awareness among SMEs about the current and future sustainability requirements in local and export markets, potential technologies to improve firm's sustainability and their expected impact on firms' performance, and recommended standards for green sustainability (such as international green product certification - ISO 14067 or equivalent - to facilitate integration in global value chains).

The component will provide reimbursable grants to finance SMEs' plans for upgrading their machinery, acquiring new technologies, attaining technical assistance, obtaining green certifications, and/or other interventions to facilitate a transition towards a more resource-efficient Industry and circular economy. KOSGEB will manage the implementation of the component, building on their experience in providing reimbursable grants to SMEs throughout Türkiye, under the ongoing Bank-funded Rapid Support to Micro and Small Enterprises project, combined with awareness and advisory services to coach SMEs through implementing their green transition plans.

KOSGEB will oversee running an application platform, screening SME applications for support along eligibility criteria, and checking that applicant SMEs have no outstanding tax and social security obligations.

KOSGEB will oversee the provision of reimbursable grants to SMEs according to the criteria set by the PIU. These grants will be used to upgrade establishments' machinery and equipment, adopt new technologies, and attain technical assistance to meet, for instance, green standards.

Component 2: Support the green innovation of firms.

The component will target all types of firms that are engaged in green innovation activities, which include developing new green technologies, products, or processes that are novel in Türkiye or other markets. The eligible firms could be start-ups, SMEs, or large firms.

The component will also support consortia of firms (each typically comprises a large firm and a few SMEs and, in many cases, academic institutions). The eligible activities include research and development, prototype development, standards development, and new product or process development that contribute to greener production or higher energy and/or resource efficiency.

The component will provide reimbursable grants to finance firms' plans for implementing green R&D activities, acquiring new or upgrading existing machinery, licensing new technologies, hiring R&D personnel, attaining technical assistance, developing prototypes, filing patents, developing/certifying green standards, and other relevant activities.

TUBITAK will manage the implementation of this component, building on their long experience in financing firms, platforms of firms, and startups to diversity into new products, increase R&D activities, and adopt innovative green solutions and technologies detailed in their transition plans.

TUBITAK will manage the application process, using firm eligibility criteria and lists of innovation activities eligible for funding. Applicant firms or consortia of firms will have to provide their investment proposals and funding decisions will be made by a panel of experts from different organizations, including also international experts and/or scientists with relevant experience in R&D and other innovation activities.

TUBITAK plans to provide grants and matching grants to research institutes, universities, and innovative startups from its own resources, to further support these segments of beneficiaries.

Component 3: Technical assistance and project management.

This component will provide technical assistance and capacity building for MoIT and finance the establishment of a Project Implementation Unit (PIU) to manage the implementation of project activities. The PIU will work in collaboration with key implementing partners, including KOSGEB and TUBITAK.

Project Description section of the ESMS is an ongoing process and will be updated when more information including targeted sectors is available. The project covers all 81 provinces in Türkiye.

1.2 Purpose of the ESMS

The ESMS aims to continuously identify, assess, manage and monitor the E&S risks and impacts of Component 1 under the Project, taking into account national laws and World Bank requirements. As such the key objectives are:

- To integrate E&S considerations into the lifecycle of the Project in order to ensure that E&S risks and impacts are consistently identified, screened, and managed;
- To provide an E&S management process and guidance for the design and implementation of the Project;
- To provide a practical tool during project formulation, design, planning, implementation and monitoring to ensure that E&S aspects are duly considered in the process in accordance with the ESSs and national laws;
- To adopt a mitigation hierarchy approach during the development in order to: avoid risks and impacts when possible; minimize or reduce risks and impacts to acceptable levels where avoidance is not possible; mitigate; and compensate for remaining significant residual impacts or offset them;
- To outline a monitoring system for the implementation of mitigation measures;
- To set out the responsibilities for E&S risk and impact identification, assessment, decision making, as well as monitoring; and
- To work with steering committee of the Project to manage E&S risks and impacts and support ongoing capacity building in the implementation of the Project.

The output of this ESMS is intended to ensure that the proposed Project' Component 1 will be environmentally and socially sound and sustainable. Effective implementation of the ESMS will ensure that the appropriate mitigation measures have been employed to avoid and/or minimize any potential impacts resulting from the proposed Component 1.

1.3 Scope of the ESMS

This ESMS provides necessary means and measures to achieve goals of the Project. The key feature of the ESMS is continual improvement which is an ongoing process of reviewing, correcting and improving the management system. The suitability and effectiveness of the ESMS will be evaluated at least quarterly as part of the internal management review process.

This ESMS of the Project is supported by the other the Project-specific documents. Those of particular relevance to this document are as follows:

- Environmental and Social Commitment Plan (ESCP)
- Stakeholder Engagement Plan (SEP)
- Labor Management Procedure (LMP)

This ESMS is intended to cover the E&S risks and impacts and their mitigation measures for the Project's Component 1. This ESMS does not cover Component 2 and Component 3 of the Project. The ESMS will be adapted to the Project evolution and will reflect any significant change in the Project design or execution.

1.4 Lessons Learned from the Previous Project

KOSGEB currently carries out the Rapid Support for Micro and Small Enterprises Project (P174144) funded by World Bank as of April 23, 2021. Taking into consideration of devastating effects of Covid-19 pandemic over micro and small enterprises; the previous project aimed to relieve enterprises which were in prioritized strategic sectors by means of a rapid and simple liquidity-based support program. Therefore, KOSGEB has experience in complying with World Bank ESSs as assessing E&S risks and impacts of both overall portfolio of the Project and beneficiaries taking into account national and international requirements. The key lessons learned from the previous project are as follows:

- Consider in an integrated manner the potential E&S risks, benefits and impacts of the Project and identify measures to avoid, minimize and manage risks and impacts while enhancing benefits.
- Monitor compliance of Project's beneficiaries in line with the Project's requirements.
- Define a program for stakeholder engagement, including public information disclosure and consultation, throughout the entire Project cycle.
- The ESMS should include supporting tools such as checklists, forms for site visits, templates and guidance notes to assess and manage E&S risks and impacts.
- *Workplace Hazard Classes Communiqué on Occupational Health and Safety* (dated 26.12.2012 numbered 28509) states that the hazard classes of the workplaces in terms of OHS are specified in *the Workplace Hazard Classes List* in Annex-1 of the Communiqué. These hazard classes are crucial for enterprises to comply with the national laws. Evaluation should be made according to the hazard class of the enterprise during the application stages of the Project and the site audit of these enterprises. The presence of this phrase (OHS hazard class of enterprise) in the project application form will be useful in the later audit process and in terms of understanding the current risks of the enterprises. Some of the enterprises in Türkiye do not know their OHS hazard classes. In this way, enterprises will be able to learn their own OHS hazard classes. Therefore, KOSGEB PIU takes a step in capacity building.
- At the stage of E&S due diligence of the enterprises benefiting from the Project, the issues to be asked/considered in the site visit before conducting the inspection should be sent to the enterprise in a written form in an official manner. Thus, the enterprises to be audited have a chance to make a preliminary preparation. E&S due diligence audits of enterprises will be more efficient. Since the enterprises are not familiar with most of the questions to be asked/issues to be considered in audits.

2 Regulatory and Institutional Framework

The Project needs to comply with the World Bank's Environmental and Social Framework (ESF) comprising the Environmental and Social Standards as well as national legislation.

2.1 National Legislation

The national laws and regulations governing E&S risk mitigation will be duly applied to the Project in addition to the World Bank ESSs. The Ministry of Environment, Urbanization and Climate Change (MoEUCC) is the responsible organization for the implementation of policies adopted for protection and conservation of the

environment, and for sustainable development and management of natural resources in Türkiye. For the management of E&S issues, MoEUCC collaborates with other ministries (including their provincial organizations where relevant), government agencies and relevant stakeholders, such as; Ministry of Transport and Infrastructure, Ministry of Agriculture and Forestry, Ministry of Culture and Tourism, Ministry of Energy and Natural Resources, Minister of Labor and Social Security (General Directorate of Occupational Health and Safety, General Directorate of Labor) and Ministry of Health.

National laws for management of E&S issues are set out in:

- Environmental Law (Law No: 2872)
- Labor Law (Law No: 4857)
- Occupational Health and Safety Law (Law No: 6331)
- Social Insurance and General Health Insurance Law (Law No: 5510)
- Conservation of Cultural and Natural Property Law (Law No: 2863)
- National Parks Law (Law No: 2873)
- Forestry Law (Law No: 6831)
- Soil Conservation and Land Use Law (Law No: 5403)
- Geothermal Resources and Natural Mineral Water Law (Law No: 5686)
- Energy Efficiency Law (Law No: 5627)
- Groundwater Law (Law No: 167)
- The Use of Renewable Energy Sources for Electric Energy Generation Law (Law No: 5346)

Under the relevant laws; regulations, communiques and by-laws, which are listed in Table 1, are applicable to the Project include but are not limited to:

Table 1 List of National Regulations

Key Aspects	Regulations, Standards, Communiques and By-laws
General	Regulation on Environmental Impact Assessment
General	Regulation on Strategic Environmental Assessment
General	Regulation for Starting Up and Opening a Workplace
Environmental License and Permit	Regulation on Environmental Permits and Licenses
Environmental License and Permit	Regulation on Environmental Audit
Air	Regulation on Assessment and Management of Air Quality
Air	Regulation on Control of Industrial Air Pollution
Air	Regulation on Control of Exhaust Gas Emission
Air	Regulation on Monitoring of Greenhouse Gas Emissions
Air	Regulation of Control of Air Pollution Originated from Heating
Air	Regulation on Odor Causing Emissions
Water Supply	Regulation on Water Intended for Human Consumption
Water Supply	Regulation on Water Conservation against Pollution Caused by Nitrates from Agricultural Sources
Water Supply	Regulation on the Quality and Treatment of Water Supplied to Drinking Water
Surface Water and Groundwater	Regulation on Surface Water Quality

Key Aspects	Regulations, Standards, Communiques and By-laws
Surface Water and Groundwater	Regulation on Monitoring of Surface Water and Groundwater
Surface Water and Groundwater	Regulation on Protection of Groundwater against Pollution and Deterioration
Wastewater	Water Pollution Control Regulation
Wastewater	Regulation on Urban Wastewater Treatment
Wastewater	Regulation on Wastewater Collection and Disposal Systems
Wastewater	Regulation on Pit Opening Where Sewer System Construction is not applicable
Storm water	Regulation on Rainwater Collection, Storage and Discharge Systems
Soil	Regulation on Control of Soil Pollution and Contaminated Lands by Point Sources
Soil	Regulation on Use of Domestic and Urban Treatment Sludge in Soil
Noise	Regulation on Assessment and Management of Environmental Noise
Noise	Regulation Related to Noise Emissions by Equipment for Outdoor Use
Noise	Regulation on Protection of Buildings Against Noise
F-gases and ODS	Regulation on Fluorinated Greenhouse Gases
F-gases and ODS	Regulation on Decreasing the Ozone Depleting Materials
F-gases and ODS	Regulation on Monitoring of Greenhouse Gas Emissions
Hazardous Materials Storage	TS EN 12285-1 and TS EN 12285-2
Hazardous Materials Storage	Regulation on Control of Pollution Caused by Hazardous Substances in the Aquatic Environment and Its Surroundings
Hazardous Materials Storage	Regulation on Material Safety Data Sheets on Hazardous Materials and Mixtures
Hazardous Materials Storage	Regulation on Chemicals Record, Evaluation, Perception and Restriction
Hazardous Materials Storage	Regulation on the Transportation of Dangerous Materials on Motorways
Hazardous Materials Storage	Regulation on Safe Transportation of Radioactive Materials
Sustainability, Climate Change and Energy	Regulation on the Environmentally Responsible Design of Energy Related Products
Sustainability, Climate Change and Energy	Regulation on Energy Efficiency Audit
Sustainability, Climate Change and Energy	Regulation on the Improvement of the Energy Sources and the Efficiency in the Energy Usage
Sustainability, Climate Change and Energy	Regulation on Reduction of Sulphur Rates in Certain Types of Fuels
Waste	Regulation on Incineration of Waste
Waste	Regulation on Permanent Organic Pollutants
Waste	Regulation on Control of Excavation Soil, Construction and Demolition Wastes
Waste	Regulation on Regular Storage of Waste
Waste	Regulation on Control of Polychlorinated Biphenyls (PCBs) and Polychlorinated Terphenyls (PCTs)
Waste	Regulation on Radioactive Waste Management
Waste	Regulation on Wastes Generated from Radioactive Material Use
Waste	Regulation on Waste Management
Waste	Regulation on the Landfill of Wastes

Key Aspects	Regulations, Standards, Communiques and By-laws
Waste	Regulation on Control of Packaging Wastes
Waste	Regulation on the Control of Medical Wastes
Waste	Regulation on the Control of Waste Oils
Waste	Regulation on the Control of Waste Batteries and Accumulators
Waste	Regulation on the Control of Waste Tires
Waste	Regulation on the Control of Waste Vegetable Oils
Waste	Regulation on Management of Waste Electrical and Electronic Equipment
Waste	Communique on Recovery of Some Non-Hazardous Wastes
Waste	Regulation on the Control of End-of-Life Vehicles
Waste	Communique on Transportation of Wastes by Highway
Waste	Zero Waste Regulation
OHS	Regulation on Occupational Health and Safety Services
OHS	Regulation on Risk Assessment for Occupational Health and Safety
OHS	Regulation on the Prevention of Major Industrial Accidents and Reducing Their Effects
OHS	Communiqué on Hazard Classes List related to Occupational Health and Safety
OHS	First Aid Regulation
OHS	Regulation Concerning the Classification, Packaging and Labelling of Dangerous Substances
OHS	Regulation Concerning the Protection of Workers from Risks Associated with Noise
OHS	Regulation Concerning the Protection of Workers from Risks Associated with Vibration
OHS	Regulation on Management of Dust
OHS	Regulation on Personal Protective Equipment
OHS	Regulation Concerning the Use of Personal Protection Equipment at Workplaces
OHS	Regulation on Emergency Situations in Workplaces
OHS	Regulation on Health and Safety at Construction Works
OHS	Regulation on Health and Safety Conditions Regarding Use of Work Equipment
OHS	Regulation on Health and Safety Regarding Temporary and Time Limited Works
OHS	Regulation on Health and Safety Precautions Regarding Working with Chemicals
OHS	Regulation on Health and Safety Signs
OHS	Regulation on Methods and Principals for Workers Health and Safety Trainings
OHS	Regulation on Protecting Workers from Hazards of Explosive Environments
OHS	Regulation on Prevention and Mitigation of Impacts of Large-Scale Industrial Accidents
OHS	Regulation on Subcontractors
OHS	Regulation on Suspension of Work in Workplaces
OHS	Regulation on Vocational Training of the Employees Working in Dangerous and Highly Dangerous Workplaces
OHS	Communique on Transportation of Wastes by Highway
OHS	Regulation on Classification, Labelling and Package of the Materials and Mixtures
OHS	Regulation on the Protection of Buildings from Fire

2.2 International Requirements

The World Bank Environmental and Social Standards (ESSs) set the requirements to be met by Borrowers with respect to the identification, evaluation and mitigation of environmental and social risks and impacts associated with projects supported by the Bank through Investment Project Financing. These standards also set out the World Bank's commitment to sustainable development with the aim of ending poverty and promoting shared prosperity.

The standards of the ESF will support KOSGEB in achieving good international practice relating to environmental and social sustainability; will assist KOSGEB in fulfilling their national and international environmental and social obligations; will enhance nondiscrimination, transparency, participation, accountability and governance; and will enhance the sustainable development outcomes of projects through ongoing stakeholder engagement.

The ESSs triggered by the Project are not yet defined in the official documents of the World Bank. However, it has been presumed by KOSGEB PIU as listed below according to Concept Note dated October 28, 2022. Environmental and Social Standards that KOSGEB and the Project may meet through the project life cycle are as follows in Table 2:

Table 2 Relevance of ESSs for the Project

World Bank E&S Standards		Relevance	Description and Scope
ESS1	Assessment and Management of Environmental and Social Risks and Impacts	Relevant	<p>The World Bank requires assessment, management and monitoring of environmental and social risks and impacts of projects supported by the Bank to ensure that projects are environmentally and socially sound and sustainable. The objectives of ESS1 is; (i) to identify, evaluate and manage the environmental and social risks and impacts of the project in a manner consistent with ESSs; (ii) to adopt mitigation hierarchy approach to (a) anticipate and avoid risks and impacts, (b) where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels, (c) once risks and impacts have been minimized or reduced, mitigate, and (iv) where significant residual impacts remain, compensate for or offset them, where technically and financially feasible, (iii) to adopt differentiated measures so that adverse impacts do not fall disproportionately on the disadvantaged or vulnerable, and they are not disadvantaged in sharing development benefits and opportunities resulting from the project, (iv) to utilize national environmental and social institutions, systems, laws, regulations and procedures in the assessment, development and implementation of projects whenever appropriate, and (v) to promote improved environmental and social performance in ways which recognize and enhance capacity.</p> <p>As per requirements of ESS1, KOSGEB will: (i) conduct an environmental and social assessment of the beneficiaries; (ii) undertake stakeholder engagement and disclose appropriate information in accordance with ESS10; (iii) update the Environmental and Social Commitment Plan (ESCP) if necessary, and implement all measures and actions set out in the legal arrangement including the ESCP; and (iv) conduct monitoring and reporting on the environmental and social performance of the beneficiaries against the ESSs.</p>
ESS2	Labor and Working Conditions	Relevant	<p>The objectives of ESS2 is to: (i) promote safety and health at work; (ii) promote the fair treatment, nondiscrimination and equal opportunity of project workers; (iii) protect workers including vulnerable workers such as women, persons with disabilities, children (of working age, in accordance with ESS2) and migrant workers, contracted workers, community workers and primary supply workers, as appropriate; (iv) prevent the use of all forms of forced labor and child labor (v) support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law; and (vi) provide project workers with accessible means to raise workplace concerns. The applicability and scope of application of ESS2 depends on the environmental and social assessment described in ESS1 and the type of employment relationship between the Borrower and the project workers.</p>

World Bank E&S Standards		Relevance	Description and Scope
ESS3	Resource Efficiency and Pollution Prevention and Management	Relevant	<p>The objectives of ESS3 is to: (i) promote the sustainable use of resources, including energy, water and raw materials; (ii) avoid or minimize adverse impacts on human health and the environment by avoiding minimizing pollution from project activities; (iii) avoid or minimize project related emissions of short and long-lived climate pollutants; (iv) avoid or minimize generation of hazardous and non-hazardous waste; and (v) minimize and manage the risks and impacts associated with pesticide use. The applicability of ESS3 depends on the environmental and social assessment described in ESS1.</p> <p>ESS3 requirements cover: (i) resource efficiency including energy, water and raw material use; and (ii) pollution prevention and management including management of air pollution, hazardous and non-hazardous wastes, chemicals and hazardous materials, and pesticides.</p>
ESS4	Community Health and Safety	Relevant	<p>ESS4 addresses potential health, safety, and security risks and impacts on project-affected communities and corresponding responsibility of KOSGEB to avoid or minimize these, with particular attention to vulnerable people. The objectives of ESS4 is to: (i) anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life cycle from both routine and nonroutine circumstances; (ii) promote quality and safety, and considerations relating to climate change, in the design and construction of infrastructure, including dams; (iii) avoid or minimize community exposure to project-related traffic and road safety risks, diseases and hazardous materials; (iv) have in place effective measures to address emergency events; and (v) ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities. The applicability of ESS4 depends on the environmental and social assessment described in ESS1.</p> <p>ESS4 requirements cover: (i) community health and safety including infrastructure and equipment design and safety (including safety of dams), safety of services, traffic and road safety, ecosystem services, community exposure to health issues, management and safety of hazardous materials, and emergency preparedness and response; and (ii) security personnel.</p>
ESS5	Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Not Relevant	The Project is not expected to trigger ESS5.
ESS6	Biodiversity Conservation and Sustainable Management of Living Natural Resources	Not Relevant	The Project is not expected to trigger ESS6.
ESS7	Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	Not Relevant	The Project is not expected to trigger ESS7.
ESS8	Cultural Heritage	Not Relevant	The Project is not expected to trigger ESS8.
ESS9	Financial Intermediaries	Relevant	<p>Financial Intermediaries (FIs) are required to monitor and manage environmental and social risks and impacts of the projects they finance. The objectives of ESS9 is to: (i) set out how the FI will assess and manage environmental and social risks and impacts associated with the subprojects it finances; (ii) promote good environmental and social management practices in the subprojects the FI finances; and (iii) promote good environmental and sound human resources management within the FI. ESS9 applies to FIs that receive financial support from the Bank including public and private financial services providers.</p> <p>ESS9 requirements cover: (i) environmental and social management system including environmental and social policy, environmental and social procedures, organizational capacity and competency, and monitoring and reporting; and (ii) stakeholder engagement.</p>
ESS10	Stakeholder Engagement and	Relevant	Open and transparent engagement between the Borrower and project stakeholders is one of the essential elements of good international practice and effective stakeholder engagement improves the environmental and social sustainability of projects. The

World Bank E&S Standards		Relevance	Description and Scope
	Information Disclosure		<p>objectives of ESS10 is to: (i) establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties; (ii) assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance; (iii) promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them; (iv) ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format; and (v) provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances. ESS10 applies to all projects supported by the Bank through Investment Project Financing.</p> <p>ESS10 requirements cover the development of a stakeholder engagement framework and/or plan that will define the following; (i) engagement during project preparation including stakeholder identification and analysis, stakeholder engagement plan, information disclosure, and meaningful consultation; (ii) engagement during project implementation and external reporting; (iii) grievance mechanism; and (iv) organizational capacity and commitment.</p>

ESSs alone may not be sufficient to fulfil the World Bank E&S Framework. The following international requirements in order to provide comprehensible guidance on the application of the ESSs are as follows:

- Guidance Note-1: Assessment and Management of Environmental and Social Risks and Impacts
- Guidance Note-2: Labor and Working Conditions
- Guidance Note-3: Resource Efficiency and Pollution Prevention and Management
- Guidance Note-4: Community Health and Safety
- Guidance Note-9: Financial Intermediaries
- Guidance Note-10: Stakeholder Engagement and Information Disclosure
- World Bank Group - Environmental, Health, and Safety (EHS) General Guidelines (30 April 2007)

The Guidance Notes provide guidance for the Borrower on the application of the Environmental and Social Standards. They help to explain the requirements of the ESSs of the World Bank.

IFC which is a member of the World Bank Group sets out the General EHS Guidelines. The EHS Guidelines are technical reference documents with general and industry-specific examples of Good International Industry Practice (GIIP) and are referred to in the World Bank's E&S Framework. The World Bank Group requires borrowers/clients to apply the relevant levels or measures of the EHS Guidelines. The applicability of the EHS Guidelines is meant to be tailored to the hazards and risks established for each project on the basis of the results of an environmental assessment in which site-specific variables, assimilative capacity of the environment, and other project factors, are taken into account. These guidelines provide guidance and examples of reasonable precautions to implement in managing principal risks to OHS.

When Turkish regulations differ from the levels and measures presented in the EHS guidelines, projects are expected to achieve whichever is more stringent. If less stringent levels or measures than those provided in these EHS guidelines are appropriate, in view of specific project circumstances, a full and detailed justification for any presented alternatives is needed as part of the site-specific environmental assessment.

The Bank will classify all projects (including projects involving Financial Intermediaries) into one of four classifications: High Risk, Substantial Risk, Moderate Risk or Low Risk. Environmental and Social risk classification of the Project is Moderate. In determining the appropriate risk classification, the World Bank will take into account relevant issues, such as the type, location, sensitivity, and scale of the project; the nature and magnitude

of the potential environmental and social risks and impacts; and the capacity and commitment of the Borrower to manage the environmental and social risks and impacts in a manner consistent with the ESSs.

3 Environmental and Social Policy

KOSGEB's overall vision is "stronger SMEs and developing economy". Fundamental values underlying KOSGEB's overall strategy and policy are honesty, accessibility, reliability, target group orientation, accountability, open to collaboration, respectability, transparency, impartiality and innovativeness.

KOSGEB has its own environmental and social policy signed by vice president. This policy remarks that KOSGEB's overall mission is to increase the shares of SMEs and entrepreneurs in economic and social development to reach an innovative, technological and competitive structure through effective supports and services. Therefore, KOSGEB adopts the following environmental and social policies by aiming to avoid or reduce the negative environmental and social impacts of its activities and to leave a sustainable world for the future generations with a growing environmental awareness. KOSGEB:

- Complies with applicable Turkish and international legal requirements in order to strive for continual improvement in Environmental and Social Management System;
- Aims at supporting enterprises which may have environmental awareness and fully satisfy the environmental and social needs;
- Acknowledges new standards and sets new goals with constant focus on development and continual improvement;
- Plans projects by considering energy efficiency and aims to reduce energy consumption;
- Monitors the environmental and social performance of enterprises with continual improvement approach by developing their capacity;
- Focuses on resource efficiency, avoids wastage and contributes to environmental protection;
- Considers to support sustainable use of resources while undertaking all its activities;
- Respects the values, views and rights of the affected communities and establishes strong, open and fair relationships with affected communities;
- Implements engagement activities and discloses project related information through appropriate and transparent means considering the needs and expectations of related parties;
- Strives for continuous improvement in upholding and respecting human rights through ongoing dialogue with internal and external stakeholders; and
- Respects cultural background of the affected communities and supports enterprises by avoiding impacts on tangible and intangible cultural heritage.

This policy will be examined annually and revised if needed to meet the national and international requirements of the organization. KOSGEB will consistently implement and monitor its Environmental and Social Management System in all activities and ensure that they are in line with this policy.

4 Organizational Capacity and Competency

4.1 E&S Organizational Structure and Roles and Responsibilities

Project Implementation Unit (PIU) will be formed within KOSGEB for the scope of the Project's Component 1, and will work in coordination with Steering Committee (established under the MoIT) of the Project. KOSGEB

PUI is required to develop and maintain organizational capacity and competency for implementing the ESMS, with clearly defined roles and responsibilities.

KOSGEB PIU will be responsible for ensuring compliance with World Bank ESF by establishing and maintaining an E&S Management System and monitoring compliance with E&S mitigation measures.

4.1.1 E&S Roles and Responsibilities

Project Implementation Unit has been formed under the KOSGEB Sustainability Supports Directorate of Project Management Department within the scope of the Project, and will work in coordination with other KOSGEB Units.

Project Manager

- Be responsible for decision making, evaluation and design of the project to be applied;
- Be responsible for overall coordination of the project and high-level communication;
- Be responsible for taking, implementing and directing all technical, administrative, legal and financial measures required to finalize the project; and
- Be responsible for overall ESMS implementation.

Deputy Project Manager

- Be responsible for the execution of the project, monitoring the results; and
- Provide briefing to the Project Manager at regular intervals, and coordination with the PIU and other relevant units.

Project Coordinator

- Be responsible for overall supervision and coordination for Project implementation;
- Be responsible for the daily implementation of the project, the management of the PIU team, preparation of the documents deemed necessary by the World Bank and updating them when necessary;
- Be responsible for the communication with the directorates in provinces within the scope of the project;
- Be responsible for monitoring, evaluation and reporting of performance indicators, and the survey studies; and
- Be responsible for submitting weekly activity reports, information notes and promotional documents to the Deputy Project Manager.

Environmental Specialist

- Coordinate the implementation and monitoring of the ESMS, LMP and SEP within the scope of the project by other relevant units;
- Ensure that project activities are carried out and reported in accordance with the World Bank ESSs and Environmental and Social Commitment Plan;
- Prepare E&S control criteria and commitments to be added to the application forms of beneficiaries and create guidelines for relevant units to control applications according to E&S criteria;

- Coordinate the screening of beneficiaries' applications for activities that cannot be financed within the framework of the ESMS and for eligibility for the project;
- Conduct and report stakeholder consultation activities with social specialist in accordance with the SEP;
- Update ESMS, LMP and SEP, when necessary, in the course of preparation, development and implementation of the Project, as well as in case the domestic legislation changes in any aspects meeting with World Bank representatives when necessary;
- Organize the responsibilities of OHS and Social Specialists to conduct regular field audits and prepare a complete E&S monitoring and ESDD report and share it with the World Bank periodically;
- Carry out the updating, implementation and reporting activities of the grievance mechanism with social specialist according to the project needs within the scope of the project;
- Prepare E&S information and documents to be included in the project reports;
- Be in cooperation and coordination with the Project Manager and providing support when necessary;
- Be in cooperation and coordination with OHS and Social specialists, PIU staff and other relevant units;
- Train project workers and SME specialists in provincial directorates for execution of spot-checks and E&S risk categorization;
- Identify/anticipate the E&S risks of the beneficiaries' activities and define measures;
- Review all the project related documentation such as ESMS, LMP, SEP and E&S checklists, forms and commitments to ensure that E&S risks are adequately identified, and related mitigations are considered within the scope of national legislation;
- Ensure that all project activities have been adequately implemented pursuant to the World Bank ESF;
- Organize and conduct training for the Project workers and SME specialists in provincial directorates related to the requirements of World Bank ESF, labor issues, code of conduct, measures on the Sexual Exploitation and Abuse/Sexual Harassment and Gender-Based Violence, community health and safety and E&S assessment methods;
- Conduct site visits with OHS and Social Specialists to evaluate the Project activities' compliance with the E&S requirements, report findings, suggest corrective measures in case of non-compliance, and monitor its implementation;
- Perform any other project tasks assigned by the Project Manager and contribute to the ongoing activities of PIU; and
- Prepare periodically E&S progress reports on the implementation of the Project.

Social Specialist

- Be responsible for the actions related to stakeholder engagement and grievance mechanism as described in project specific SEP;
- Assist PIU Environmental Specialist in defining project' activities social risks through the screening and monitoring process and the project exclusion criteria;
- Update SEP, when necessary, in the course of preparation, development and implementation of the Project, as well as in case the domestic legislation changes in any aspects meeting with World Bank representatives when necessary;
- Carry out public consultations regarding stakeholder engagement and grievance mechanism disclosure;
- Coordinate community interactions and activities with Project-affected persons;

- Support the implementation of the project ensuring wider participation of citizens with a particular focus on reaching out to vulnerable and disadvantaged people or group;
- Carry out social screening and monitoring of the beneficiaries' activities regarding E&S risk categorization according to the World Bank's ESF requirements to ensure all potential social impacts are identified and addressed;
- Carry out overall supervision of the Grievance Mechanism including recording complaints, conveying them to relevant units for resolution, and following the timely provision and the quality of the resolutions;
- In coordination with environmental specialist, perform E&S audits for beneficiaries' activities and, when required, prepare ESAP based on this audit;
- Organize and conduct trainings to the SME specialists in provincial directorates, related to requirements of World Bank ESF, grievance mechanism and stakeholder engagement processes;
- Report to PIU regarding any disputes detected about beneficiaries' commitments;
- Provide recommendations to PIU on any issues that would require additional measures to be taken;
- Perform any other project tasks assigned by Environmental Specialist and the Project Manager and contribute to the ongoing activities of the PIU;
- Carry out beneficiary satisfaction surveys; and
- Ensure that all project activities have been adequately addressed pursuant to the World Bank ESF.

Occupational Health and Safety Specialist

- Assist PIU Environmental Specialist in defining project' activities OHS risk levels through the screening and monitoring process and the project exclusion criteria;
- Identify/anticipate OHS risks of the beneficiaries' activities and define measures;
- Review all OHS related documents/reports/plans and ensure that those are in line with the WB requirements;
- Prepare comments/recommendations to the PIU's management, and follow up on the implementation;
- Ensure that all project activities have been adequately addressed pursuant to the World Bank ESF, and the World Bank Group's General EHS Guidelines with regards to OHS;
- Ensure that relevant training is provided to project workers and SME specialists in provincial directorates through a review of training records and relevant training documentation;
- Supervise the beneficiaries' compliance with Project requirements on-site;
- Conduct field visits to subproject's sites to monitor the activities to be implemented in the scope of ESMS and LMP;
- Ensure that any incident or accident is promptly notified to the World Bank, and a related report is prepared including proposed measures to address it and prevent its recurrence;
- Examine the accident/incident/near miss and ensure they are correctly recorded along with a corrective action plan that complies with the national requirement and WB standards;
- Produce periodic statistics on OHS incidents, analyze trends, and recommend focused strategies/measures to prevent worksite-related non-compliances and incidents from re-occurring. Develop accident procedures, forms, and guidelines;
- Be responsible for documentation of the reports related to OHS issues;
- Perform any other project tasks assigned by Environmental Specialist and the Project Manager and contribute to the ongoing activities of the PIU; and
- Contribute to the preparation of the ESDD reports on the implementation of the Environment and Social Management System.

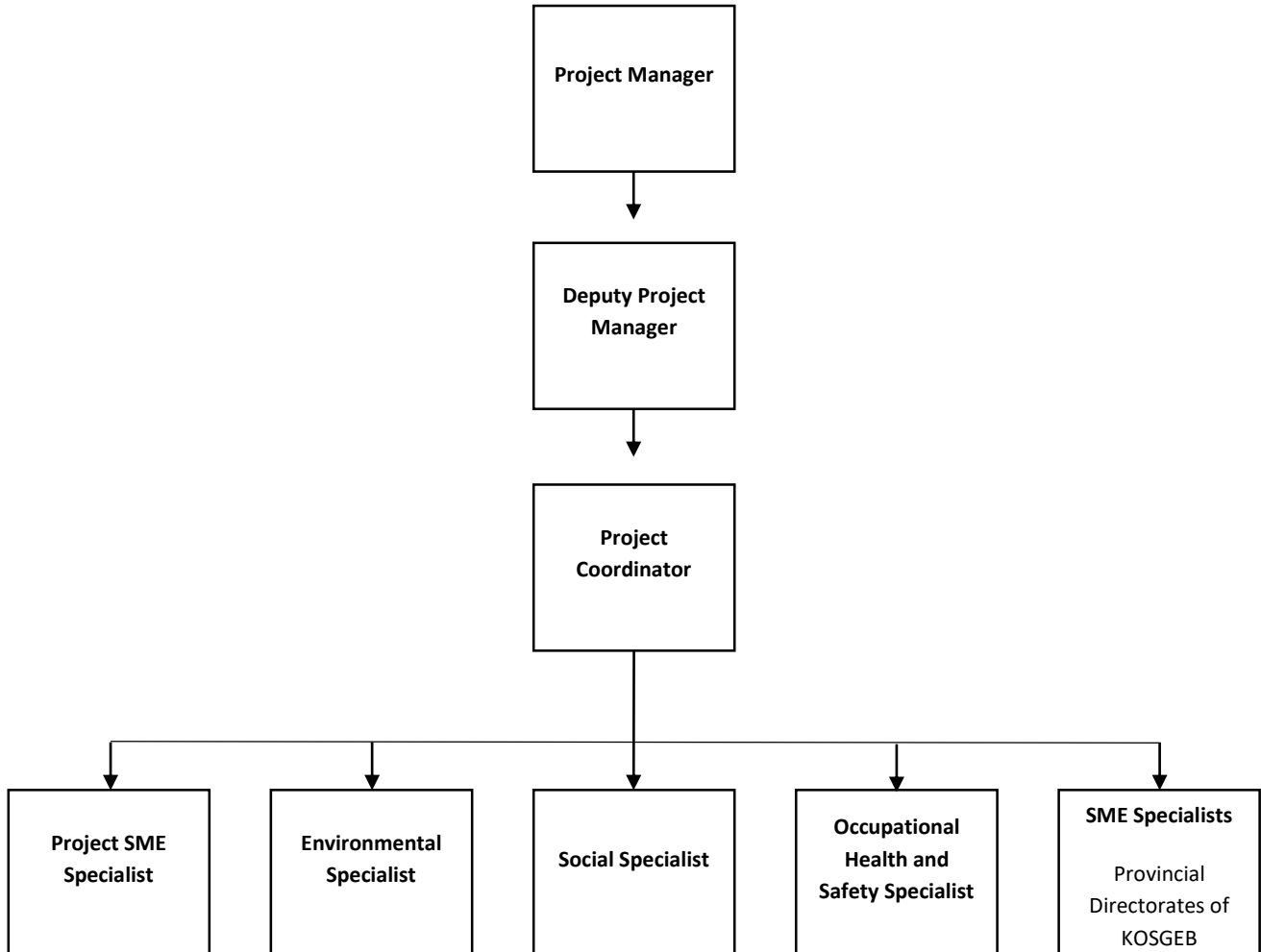
Project SME Specialist

- Assist Environmental, Social and Occupational Health and Safety specialists in establishing environmental and social management system and in managing stakeholder engagement activities;
- Create E&S reports and statistics regarding the supports provided to beneficiaries within the scope of the project;
- Assist Environmental, Social and Occupational Health and Safety specialists in identification, assessment, reporting and management of environmental and social risks and impacts; and
- Carry out the updating, implementation and reporting activities of the internal grievance mechanism for KOSGEB employees.

SME Specialists in Provincial Directorates of KOSGEB

- Consolidate all project activities within their region on a firm-by-firm basis and share the list with the PIU;
- Introduce the project to the beneficiaries and receive their requests; and
- Perform on-site inspections, when necessary, in order to determine whether the environmental and social conditions in the letter of commitment are fulfilled, and assist in preparing due diligence report.

4.1.2 E&S Organizational Structure



4.2 Training

One of the most important mechanisms for the development of the Project's E&S performance will be the continued implementation of a program of E&S training for all Project's workers. Enhancement of the Project's E&S performance will be achieved by implementation of an E&S training program for KOSGEB PIU.

There are three training organizations planned for the Project at this stage of the Project. This section will be updated when further training on the project is planned.

- Environmental Specialist, Social Specialist and OHS Specialist to be hired within PIU and Project SME Specialist will receive E&S Training Courses on Sustainability Training and E-Learning Program (STEP) within the 30 days after the Project becomes effective. This free e-training will aim to help KOSGEB PIU better understand sustainable finance, social and environmental risk management and explore sustainability-related business opportunities. (For the training modules, please visit https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/company-resources/tools+for+clients#STEP)

- Environmental Specialist, Social Specialist and OHS Specialist to be hired within PIU will receive online course entitled “ESF Fundamentals” aimed at E&S practitioners within the 30 days after the Project becomes effective. The “ESF Fundamentals” course delves into each of the ESF Environmental and Social Standards (ESS). It includes videos and two case studies with stakeholders demonstrating and sharing helpful approaches, mindsets and behaviors that are key to successful implementations of the ESF. It comprises 8 modules and takes about 8 hours to complete. (For the training modules, please visit <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/esf-training>)
- Project Training will be organized in order to increase KOSGEB call center employees' knowledge about the Project and their awareness of E&S subjects. In this way, they are able to handle all grievances filed received from stakeholders.
- E&S awareness training will be organized for Project workers and SME specialists of Provincial Directorates of KOSGEB since they will be working with E&S specialists to monitor, review and report E&S issues. They will be partially responsible for ESMS implementation on-site. The training will be conducted by Environmental, Social and OHS Specialists periodically. Refresher training will be provided to all staff on an annual basis. Additional training in the specific requirements that support the ESMS will be provided, as appropriate for individual work assignments.

5 Identification, Assessment and Management of E&S Risks and Impacts

This section outlines the E&S screening process leading to review, approval or exclusion of activities to be financed under the Project. The screening process intends to:

- Determine potential impacts of activities and their likelihood to cause negative E&S impacts;
- Determine appropriate mitigation measures for activities with adverse impacts;
- Incorporate mitigation measures into project design;
- Review and approve project proposals, and
- Monitor E&S parameters during project implementation.

5.1 Exclusion List under the Project

The enterprises in the following activities are not eligible for financing of the Project given the significant E&S adverse impacts:

- Production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements, or subject to international bans, such as pharmaceuticals, pesticides/herbicides, ozone depleting substances, PCB's, wildlife or products regulated under CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora).
- Production or trade in weapons and munitions.
- Production or trade in alcoholic beverages (excluding beer and wine).
- Production or trade in tobacco.
- Gambling, casinos and equivalent enterprises.
- Production or trade in radioactive materials. This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where IFC considers the radioactive source to be trivial and/or adequately shielded.
- Production or trade in unbounded asbestos fibers. This does not apply to purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%.

- Drift net fishing in the marine environment using nets in excess of 2.5 km. in length.
- Production or activities involving harmful or exploitative forms of forced labor/harmful child labor.
- Commercial logging operations for use in primary tropical moist forest.
- Production or trade in wood or other forestry products other than from sustainably managed forests.
- Production, trade, storage, or transport of significant volumes of hazardous chemicals, or commercial scale usage of hazardous chemicals. Hazardous chemicals include gasoline, kerosene, and other petroleum products.

At this stage of the Project, it is not yet clear which sectors will benefit from the Project. Once the sectors are identified, a list will be prepared on the basis of sector (with NACE codes) and thus, activities of the enterprises that cannot apply to the Project will be determined in this section of the ESMS.

5.2 E&S Risks and Impacts of the Project

The Project will provide support to eligible SMEs to carry out providing clean, accessible and reliable energy and mobilizing industry for a clean and circular economy. The exact location, nature, scale and scope of the potential risks and impacts cannot be exactly known at this stage of the Project. However, they have been estimated by desk-based studies. They will be further elaborated in the later stages of the project.

Beneficiary SMEs are expected to engage in diverse types of activities, some of which may have negative environmental and/or social impacts and risks. However, these negative impacts are likely to be minor, localized, and reversible and can be mitigated through proper environment and social screening, application of simple measures and environmental good practices. At the moment, the locations and details of the beneficiary firms are not known, however it is expected that the Project will provide support to SMEs countrywide.

5.2.1 E&S Risks and Impacts of the Overall Portfolio

This section describes the potential positive and negative E&S impacts of the Project based on the understanding of the overall portfolio.

E&S risks and impacts of the overall portfolio are given in Table 3 below.

Table 3 E&S Risks and Impacts of the Overall Portfolio

#	Risk/Impact	Importance	Action/Mitigation Measure	Responsibility
1	Supporting enterprises to reduce their carbon footprint, water consumption and increase their energy efficiency by supporting the uptake of green technologies	-	Positive impact	KOSGEB
2	Capacity of KOSGEB PIU to implement the ESF requirements of World Bank	Low	KOSGEB currently carries out the Rapid Support for Micro and Small Enterprises Project (P174144) funded by World Bank. The ESS requirements are the same as the previous Project. ESS 5, 6, 7, 8 are not expected to be triggered in the current Project either. Therefore, KOSGEB is committed to complying with the ESF requirements. If deemed necessary, an E&S training organization	KOSGEB

#	Risk/Impact	Importance	Action/Mitigation Measure	Responsibility
			will be organized for experts in both KOSGEB PIU and provincial directorates.	
3	Spread of perceptions of greenwashing among enterprises	Low	<p>Greenwashing is the process of conveying a false impression or misleading information about how a company's products are environmentally sound. Greenwashing involves making an unsubstantiated claim to deceive consumers into believing that a company's products are environmentally friendly or have a greater positive environmental impact than they actually do.</p> <p>Transparency is necessary in combating greenwashing when it's done intentionally or without the intent to mislead. KOSGEB will be specific and seek coherence when evaluating the subprojects submitted by the beneficiaries. Academic institution will be involved in this process. Taking a scientific approach will prevent this situation with evidence. Beneficiaries will need to commit to transparency and accurate reporting. The subprojects will be verified with strong, independent, easily accessible evidence.</p>	KOSGEB
4	Social inclusion aspects	Low	<p>Social inclusion is defined as the process of improving the terms of participation in society, particularly for people who are disadvantaged, through enhancing opportunities, access to resources, voice and respect for rights.</p> <p>Mainstreaming gender equality and empowerment of women and their social and professional inclusion will be considered. The Component 1 will be designed to incorporate gender consideration during the design and implementation. One of the Disadvantaged Groups has been considered as women-led or women-managed enterprises. Therefore, attention will be paid to find approaches and means to ensure outreach and active engagement of this particular disadvantaged groups.</p>	KOSGEB
5	Sexual exploitation and abuse (SEA) and sexual harassment (SH)	Low	<p>The Project will adopt a zero-harassment policy for all workers. The Project GRM will be available to all workers. Awareness raising and training will be conducted for all Project workers. Project workers will be provided GBV orientation. GBV considerations are included in the GRM for project workers. The GRM that will be in place for the project workers will also be used for addressing SEA/SH-related issues and will have in place mechanisms for confidential reporting with safe and ethical documenting of SEA/SH issues.</p>	KOSGEB

The Project is expected to have positive E&S impacts. The Project will mainly finance the purchase of machinery and equipment – green technologies, which will be clearly defined under the project design. Neither large-scale physical nor civil works are expected within the scope of the Project, nor activities which would require land acquisition, restrictions to land use or of involuntary resettlement, nor those with significant impacts on biodiversity or cultural heritage.

The project's E&S risks and impacts can be easily mitigated in a predictable manner. Proceeds from the Bank loan will not be expected to be used to finance beneficiaries' activities of substantial and/or high E&S risks, activities requiring land acquisition and involuntary resettlement, and those with impacts on sensitive areas (for example, nationally and internationally protected areas) and cultural heritage, as well as activities involving child and forced labor.

The project will support manufacturing firms to use resources more efficiently and innovate in their management, production process, and/or products to meet future market demand. The proposed project will introduce innovative measures to support the Government of Türkiye to meet its climate change commitments set by the Paris agreement and to prepare the manufacturing sector for the global green standards for production. The project will facilitate the introduction of environmentally friendly and less carbon-intensive production technologies by manufacturing firms in Türkiye where this is expected to reduce greenhouse gas

emissions as well as improve energy security and affordability which in turn would improve the international competitiveness of the sector.

The proposed project will help the manufacturing sector to adjust to the CBAM to be adopted by the EU in 2026. Turkish firms' adjustment to the CBAM will be critical for their economic performance because the EU is the primary export destination of the Turkish manufacturing sector. Considering the impact of the war in Ukraine on the global energy prices, the project is also expected to diminish import dependence and to support manufacturing firms that rely on fossil fuel to reduce their energy costs. The project, therefore, will help the sector to avoid future regulatory costs on exports and to improve the sector's competitiveness. The project is expected to promote a circular economy by promoting recycling of waste that would improve resource efficiency, which would, in turn, increase the profitability of the manufacturing firms.

In addition to its environmental aspects, the project aims to deliver social and economic gains by enhancing competitiveness and employment in selected industries. To create the jobs needed to employ the rapidly growing labor force and raise it to a higher income level, Turkish businesses need to adopt global trends in advanced economies. This can be achieved by innovating and/or adopting greener management practices and production methods which would in turn increase productivity and move the manufacturing sector up the value chain. In manufacturing activities, where job losses may occur, the project will offer re-skilling of workers to align with new job requirements.

5.2.2 E&S Risks and Impacts of the Beneficiaries

This section identifies the potential E&S risks and impacts that could arise from the activities of the subprojects proposed by beneficiaries. Based on the planned scope of the Project, the E&S risks and impacts of the beneficiaries are expected to be low in magnitude and temporary.

The potential E&S risks and impacts of the beneficiaries are likely to have the following characteristics:

- Predictable and expected to be temporary and/or reversible;
- Low in magnitude;
- Site-specific; and
- Low probability of serious adverse effects to human health and/or the environment.

E&S risks and impacts of the beneficiaries are given in Table 4 below.

Table 4 E&S Risks and Impacts of the Beneficiaries

#	Risk/Impact	Importance	Action/Mitigation Measure	Responsibility
1	Dust and environmental noise generation	Low	These risks and impacts are expected to be site specific, temporary and easily managed with standard mitigation measures and compliance with national laws.	Beneficiary Enterprises
2	Water and energy use	Low		Beneficiary Enterprises
3	Increased generation of any type of waste and wastewater	Low		Beneficiary Enterprises
4	Pollution to the air, soil and water	Low		Beneficiary Enterprises
5	Impacts on the health, safety and security of communities	Low		Beneficiary Enterprises
6	Noncompliance with national and international labor and working conditions	Low		Beneficiary Enterprises
7	Noncompliance with national and international occupational health and safety standards	Low		Beneficiary Enterprises

KOSGEB PIU is required to provide oversight and support in the implementation of the beneficiaries' E&S management system. Beneficiaries will be required to promptly report to the KOSGEB PIU any actual or potential material adverse E&S event immediately after becoming aware of it.

Project activities are expected to have minimal, limited, reversible, temporary and manageable E&S impacts. These impacts are expected to be site specific, low in magnitude and localized and easily managed with standard mitigation measures. They can be easily mitigated through known good management practices. The potential impacts can be fully mitigated or minimized by complying the national laws and regulations and World Bank ESF. Eligible beneficiaries will be required to comply with national environmental, labor and occupational health and safety (OHS) laws.

6 E&S Screening, Monitoring and Reporting

The objective of the E&S monitoring is to help ensure that activities under the Project will:

- Protect human health and safety;
- Prevent environmental degradation as a result of either individual subprojects proposed by beneficiaries or their cumulative effects;
- Enhance positive E&S outcomes; and,
- Ensure compliance with World Bank ESF and Turkish Environmental Law and Regulations.

6.1 E&S Risk Classification

E&S risk is a combination of the probability of certain hazard occurrences and the severity of impacts resulting from such an occurrence. This risk classification is as follows:

High Risk: is likely to generate a wide range of significant adverse risks and impacts on human populations or the environment, for example, as a result of its large scale, hazardous nature or the sensitivity of its location, and effective mitigation of some impacts may be not possible or likely.

Substantial Risk: may be less complex, and smaller in scale or in a less sensitive area than a High Risk. Alternatively, it may be complex but be prepared and implemented in an environment where the technical capacity is high, mitigating technology available, and legal frameworks strong so that avoidance or effective mitigation of significant adverse impacts is more likely.

Moderate Risk: is one in which the potential for adverse risks and impacts is not likely to be significant.

Low Risk: is one in which the potential for adverse risks and impacts is minimal or negligible. Following initial screening, these projects will likely require no additional assessment.

E&S Risk Classification of the Project is **Moderate**. Proceeds from the Bank loan will not be used to finance beneficiaries' activities of substantial and/or high E&S risks.

Beneficiaries will not be implementing any subprojects which may have substantial and/or high E&S risks. E&S monitoring system will start from the application phase of the Project. KOSGEB will monitor the E&S impacts of the subprojects to be conducted by beneficiaries on a regular basis. The E&S Risk Classification of each subproject proposed by beneficiaries will be determined through the screening process. E&S risks are basically defined by checking NACE code of the SMEs. (See Annex-4)

6.2 E&S Screening and Monitoring Process

The proposed subprojects will be screened by KOSGEB PIU. The purpose of screening is to determine the beneficiaries' subprojects of eligibility for World Bank funding and to identify, whether the subprojects would have the potential to cause significant adverse impacts on the environment and the community.

The main steps for ensuring the beneficiaries' compliance with E&S requirements are given in Table 5 below.

Table 5 Main steps for ensuring beneficiaries' compliance with E&S requirements

Stages	Steps
Application Stage	<p>Beneficiaries are expected to fill out the particular section in the Application Form with regard to declarations and commitments regarding compliance with E&S application criteria. This section will consist of E&S aspects, types of environmental permits and licenses that the enterprise must have and sectoral E&S risks.</p> <p>Beneficiaries will declare that their activities comply with national E&S legislation in Application Form. KOSGEB application software (KBS) will block the applications submitted by SMEs that are in sectors in exclusion list and by SMEs that have substantial and/or high E&S risks.</p> <p>Beneficiaries will approve commitment letter which includes declarations about conformity with national E&S legislation and World Bank Group's Anti-Corruption policies. This commitment letter will also include their declaration stating that they will report incidents and accidents to KOSGEB PIU.</p>
Control Stage	<p>The applications of SMEs that are in the WB exclusion list sectors are blocked automatically by KBS. The applications of all SMEs under the project will be reviewed and categorized according to their potential E&S risk classification and their hazard classes of the workplaces in terms of OHS specified in the Workplace Hazard Classes List in Annex-1 of the Communique. Application Control Form will be used to record reviews and results.</p> <p>The category will determine the extent of monitoring of enterprises.</p> <ul style="list-style-type: none"> Beneficiaries with "Low" E&S risk do not require further monitoring. "Less Hazardous" workplaces do not require further monitoring. <p>Where "High" or "Substantial" risk activities are identified, they are blocked automatically by KBS.</p>
Monitoring Stage	<p>Field audits will be conducted at the intervals specified in the ESCP. Beneficiaries with "Moderate" E&S risk and "Hazardous" and "High Hazardous" workplaces will be monitored. An E&S monitoring form will be designed for due diligence. If nonconformities are detected during the field visits, the ESAP will be prepared and shared with the relevant SME along with mitigation deadlines.</p> <p>It will be mandatory for OHS Specialist to participate in the audit of "High Hazardous" workplaces.</p> <p>The EIA exemption document will be asked from beneficiaries at this stage for Solar Energy Investments by Industrial SMEs according to the Environmental Impact Assessment Regulation dated 29.07.2022 and Official Gazette No. 31907.</p>

6.3 Regular Progress Reports

Implementation of the material measures and actions set out in ESMS will be monitored and reported to the Bank by KOSGEB PIU as required by the ESCP and the conditions of the legal agreement. KOSGEB PIU will prepare

and submit to the World Bank regular monitoring reports on the environmental, social, health and safety performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s). Such reports will highlight any issues arising from non-compliance with E&S requirements and how it has been/is being addressed.

KOSGEB PIU will submit six-monthly reports to the World Bank throughout Project implementation, commencing after the Effective Date of the Loan. KOSGEB PIU will submit each report to the World Bank no later than 15 days after the end of each reporting period.

KOSGEB PIU will submit to the Bank the first five (5) Environmental and Social Due Diligence (ESDDs) conducted for the first (5) SMEs selected for reimbursable grant support no later than ninety (90) days after the Effective Date.

KOSGEB PIU will submit ESDDs for the largest five (5) amounts by SMEs proposed to receive reimbursable grant support under the Project on a six-monthly basis throughout the Project implementation.

Environmental and Social Due Diligence will include:

- E&S monitoring forms of visited beneficiaries
- Compliance of beneficiaries with national regulation and ESSs (particularly ESS1, ESS2, ESS3 and ESS4)
- Exclusion list status of beneficiaries
- Permits and licenses of beneficiaries if any (permit and license list that beneficiaries must obtain will be prepared before site visit according to its sector and activity)
- Beneficiaries' information and background
- Stakeholder activities and grievance mechanism of beneficiaries if any
- E&S review and summary of beneficiaries
- E&S category of beneficiaries (Moderate or Low)
- E&S action plan (to address identified gaps if any)
- Confirmation by beneficiaries that there is not child and forced labor
- Confirmation about the compliance with national labor and OHS laws

Regular monitoring reports regarding E&S performance of the project will include:

- Implementation of ESCP, SEP, ESMS and LMP
- Stakeholder engagement activities including surveys
- Internal grievance list (grievance mechanism for project workers including PIU)
- External grievance list (grievance mechanism for community, stakeholders, beneficiaries)
- Incident and accident list related to the Project
- Incident and accident reports related to the Project
- E&S monitoring forms of visited beneficiaries
- ESDDs of visited beneficiaries (including their E&S categorization, risks and impacts)
- Detailed E&S performance of the World Bank supported portfolio
- Other E&S Implementations if any

This section will be updated after the ESCP is finalized.

Beneficiaries will be required to promptly report to the KOSGEB PIU any actual or potential material adverse E&S event immediately after becoming aware of it. As noted above, these include:

- Major injuries or fatalities (of employees, the general public or contractors);

- Strikes or significant employee disputes;
- Regulator action in relation to E&S matters; and
- Spills, pollution incidents, fires, explosions, etc.

6.4 Incidents and Accidents

KOSGEB PIU promptly notifies the World Bank and Steering Committee (established under the MoIT) of any incident or accident related to the Project' Component 1 which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including but not limited to; incidents and accidents encountered during implementation of the KOSGEB's ESMS. KOSGEB PIU will report details of any significant E&S incidents (e.g., fatalities, lost time incidents, environmental spills, etc.) within 48 hours from the occurrence of the incident. KOSGEB PIU shall submit an incident report, including Root Cause Analysis (RCA), precautions and compensation measures taken within 30 business days. According to the national OHS Law, all employers must notify the Minister of Labor and Social Security in 3 work days after OHS related incidents.

Beneficiaries that receive reimbursable support financing is supposed to provide sufficient detail regarding the incident or accident, findings of the RCA, indicating immediate measures or corrective actions taken or that are planned to be taken to address it, compensation paid, and any information provided by the involved SME, as appropriate. Subsequently, as per the Bank's request, KOSGEB PIU will prepare a report on the incident or accident and propose any measures to prevent its recurrence. Incidents and accidents (and other relevant information such as RCA) will be part of the regular E&S monitoring report.

7 External Communications Mechanism

A separate draft Stakeholder Engagement Plan (SEP) has been prepared for the Project' Component 1. The overall purpose of SEP is to ensure that a consistent, comprehensive and coordinated approach is taken to stakeholder engagement and information disclosure throughout the Project. It is further intended to demonstrate the commitment of the KOSGEB, as a main implementing party of Component 1, to an 'international best practice' approach to engagement.

All stakeholders including disadvantaged and vulnerable groups have equal opportunity to access information, provide feedback, or submit grievances. The official KOSGEB website (<http://www.kosgeb.gov.tr>) will be used to disclose project-related documents, including in both Turkish and English. KOSGEB will update and maintain the website regularly.

7.1 Stakeholder Engagement

Pursuant to the World Bank ESS10 requirements, stakeholder engagement is an inclusive process implemented throughout the project life-cycle, and it is most effective if launched at early stage of project development. Engagement should begin as early as possible at project preparation, as timely identification of and consultation with the stakeholders enable views and opinions of these groups to be taken into account in the project design and implementation.

KOSGEB prepared a draft SEP and continuous stakeholder engagement will be implemented throughout the lifetime of the Project. The Project's SEP is the fundamental document governing the means by which project-related information will be managed from, and communicated to, stakeholders. KOSGEB PIU is responsible for

all external communications to the community. In accordance with SEP, KOSGEB PIU will maintain a record of all consultation and correspondence (verbal or written) with stakeholders.

The participation process for the Project is considerably inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable and disadvantaged groups.

Suggestions and comments received during consultations (both electronic and face-to-face), and received through website and social media accounts, will be reviewed, and to extent possible, and as appropriate, integrated in the SEP and project design and implementation.

7.2 Community Grievances

The main objective of a Grievance Redress Mechanism (GRM) is to assist to resolve complaints and grievances in a timely, effective and efficient manner that satisfies all parties involved. Specifically, it provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions. Specifically, the GRM:

- Provides affected people with avenues for making a complaint or resolving any dispute that may arise during the course of the implementation of projects;
- Ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants; and
- Avoids the need to resort to judicial proceedings.

The grievance mechanism will be regularly (quarterly) reviewed to ensure it is appropriately capturing and closing out the grievances and is fit for purpose. The grievance mechanism will allow community members and other stakeholders to address grievances related to a wide variety of topics such as community health, safety and security and labor related issues.

7.2.1 KOSGEB's Grievance Redress Mechanism for the Project

The grievance mechanism enables any stakeholder to make a complaint or a suggestion about the way the Project is being implemented. Grievances may take the form of specific complaints for damages/injury, concerns about routine Project activities, or perceived incidents or impacts.

The purpose of the grievance mechanism procedure is to implement a formalized process (identification, tracking and redress) to manage complaints/grievances from beneficiaries and other stakeholders in a systematic and transparent manner that could potentially arise from the Project. The grievance mechanism should ensure adequate access to adequate remedy for affected parties, other interested parties and Vulnerable and Disadvantaged Groups.

KOSGEB is currently maintaining a Grievance Redress Mechanism (GRM) for project beneficiaries and other stakeholders under the WB-funded project which is Rapid Support for Micro and Small Enterprises Project (P174144). The GRM is based on KOSGEB's existing communication channels and can be extended to cover the Türkiye Green Industry Project as well. The processes of the GRM are operated through the means of the following grievance mechanisms:

- a. Application with petition

- b. Application to CİMER
- c. Application to KOSGEB Call Center
- d. Sending direct e-mail to the KOSGEB PIU (to be announced)

a) Application with petition

Beneficiaries will report their problems with a petition to the KOSGEB PIU. If the issues stated in the petition require any inspection process (bribery, favoritism, insults, personnel complaints, etc.), the application will be sent to the KOSGEB Guidance and Inspection Board. Applications that do not require the inspection process will be directed to the Directorate with respect to the complaint. The response will be evaluated within the Directorate, and then sent to complainant. The petition regarding the complaint will be kept in the KOSGEB Document Software. In accordance with the law on the use of the right of petition, "Petitioners who are Turkish citizens and foreigners residing in Türkiye are reasoned to respond within thirty days at the latest, as a result of their applications to the competent authorities regarding their wishes and complaints about the public, or the purity of the transaction being made."

b) Application to CİMER

Presidency's Communication Center (CİMER) is a public relations application that is implemented on receiving and responding to the problems, wishes, demands and complaints of citizens in the fastest way. There are three different ways to express their complaints, suggestions and requests through the CİMER:

- 1) Firstly, an application can be made using the CİMER Application Form on the official website of the Presidency (<https://www.cimer.gov.tr>).
- 2) Their suggestions and complaints can be sent to the Presidency via the CİMER link on the E-Government portal and on the KOSGEB homepage.
(<https://www.kosgeb.gov.tr/site/tr/genel/IletisimMerkezi>)
- 3) Phone application can be made with dialing 150.

According to Directorate of Communications of Presidency of the Republic of Türkiye, if the subject of the application to CİMER contains a specific request, complaint or notice, the related institutions has to give a definite positive or negative answer within 30 days. If the subject of the application to CİMER is an information and/or document request in accordance with the Law No. 4982 on the Right to Information, the response time is 15 working days.

The application received is firstly forwarded by the Presidency to the Ministry of Industry and Technology of the Republic of Türkiye. Ministry of Industry and Technology directs the applications related to KOSGEB to the KOSGEB Corporate Communication Directorate. If the issues stated in the application require any inspection process (bribery, favoritism, insults, personnel complaints, etc.), the application is forwarded to the Directorate of Guidance and Inspection by the Corporate Communications Directorate. Applications that do not require an inspection process are directed to the Directorate with respect to the complaint by the KOSGEB Corporate Communications Directorate and the application is answered by the Directorate. The application regarding the person's complaint is kept digitally in the CİMER system. An application may be made to the judicial and administrative judicial authorities regarding the response to the complaint.

c) Application to KOSGEB Call Center

Beneficiaries will submit their complaints regarding the Project directly to the KOSGEB via dialing KOSGEB Call Center. Applications will be stored digitally in the Help Desk software by the call center personnel.

KOSGEB Call Center (444 1 567), which is active 7/24, will be used to provide information about the Project regarding complaints received, as well as corrective actions.

After the Project becomes effective, a training will be organized for KOSGEB Call Center personnel regarding the complaints and suggestions that may be received upon the Project in order to increase their knowledge about the Project.

d) Sending direct e-mail to the KOSGEB PIU (to be announced)

After the Project becomes effective, a project-specific e-mail address will be obtained. This e-mail of the KOSGEB PIU will be added on the KOSGEB website on the World Bank project special page. Anonymous complaints and E&S related grievances will be allowed to be sent to KOSGEB PIU via this e-mail. Complaints filed in this way will be recorded by the KOSGEB PIU.

All these channels will be actively used throughout the life cycle of the Project. KOSGEB PIU will keep a record of all grievances in a grievance log, and is required to work with the Project Management if necessary to resolve grievances. PIU will report grievances to the World Bank on a quarterly basis throughout the Project. Timeframe for the closure of grievances is summarized in the below Table 6.

Table 6 Timeframe for the Respond and Resolve of Grievances

Methods	Closure Time
Application with petition	<ul style="list-style-type: none"> Within 60 days according to Turkish Administrative Procedure Law No. 2577
Application to CİMER	<ul style="list-style-type: none"> Within 30 days for the specific request, complaint or notice according to Directorate of Communications of Presidency of the Republic of Türkiye Within 15 working days for an information and/or document request in accordance with the Law No. 4982 on the Right to Information
Application to KOSGEB Call Center	<ul style="list-style-type: none"> Instantly Within 15 working days for resolving the grievance (only if there is an extra process to address the grievance due to compelling reasons)
Sending direct e-mail to the PIU	<ul style="list-style-type: none"> Within 2 working days for responding the grievance Within 15 working days for resolving the grievance (only if there is an extra process to address the grievance due to compelling reasons)

7.2.2 Grievance Log

E&S expert within KOSGEB PIU will maintain grievance log to ensure that each complaint has an individual reference number and is appropriately tracked and recorded actions are completed. The log will contain the following information:

- Date of submission
- Content and details of the grievance
- Details of corrective action proposed
- E-mail or phone number of person submitting the grievance (or anonymous)
- Grievance method (by e-mail, CİMER, KOSGEB call center, petition)
- Date when the proposed corrective action is sent to the grievant (if appropriate)

- Deadline for closure
- Date of closure
- Date when the response is sent to the grievant
- Status (Closed / Open)
- CIMER grievance information (only for CIMER grievances)
 - CIMER No
 - CIMER Grievance Type ((i) Request, (ii) Opinion and Suggestion, (iii) Knowledge Acquisition, (iv) Complaint)

Closing out the grievance occurs after the implementation of the resolution has been verified. Even when an agreement is not reached, or the grievance is rejected, the results will be documented, actions and effort put into the resolution. If the grievance could not be resolved in amicable endeavor, the grievant can resort to the formal judicial procedures. Logging a grievance does not preclude or prevent seeking resolution from an official authority, judicial or other at any time (including during the grievance process) provided by legal framework.

7.2.3 Grievance Database Reporting

E&S expert within KOSGEB PIU will be in charge of reporting grievance database which will be part of the Regular E&S Monitoring Report in order to assess the performance of the Project GRM. The reporting will contain the following information:

- Project related-grievances (divided by categories)
- Total number of received complaints/inquires (since the beginning of the Project)
- Number of complaints/inquires received during the reporting period
- Open grievances (number and percentage)
- Closed grievances (number and percentage)
- Waiting decision of appeals committee (number and percentage)
- Open grievances more than 30 days (number and percentage)

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Appendix

Annex-1: Template for E&S Monitoring Form (to be prepared)

Annex-2: Template for E&S Action Plan (to be prepared)

Annex-3: Template for E&S Incident/Accident Report (to be prepared)

Annex-4: E&S Risk Categorization Guidance (to be prepared)