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MINISTRY OF AGRICULTURE AND FORESTRY

**DIRECTORATE GENERAL OF EUROPEAN UNION AND FOREIGN
RELATIONS**



**TURKEY CLIMATE SMART AND COMPETITIVE GROWTH IN AGRI-FOOD
VALUE CHAINS**

LABOR MANAGEMENT PROCEDURES

November 2021

Table of Contents

List of Tables.....	4
List of Figures	4
List of Annexes	4
List of Abbreviations	5
Glossary.....	6
Executive Summary.....	7
1. Introduction	8
2. Labor Use in the Project.....	19
2.1. Characteristics of Project Workers	19
2.2. Timing of Labor Requirements	20
3. Assessment of Key Potential Labor Risks	Hata! Yer işareti tanımlanmamış.
3.1. Project activities	Hata! Yer işareti tanımlanmamış.
3.2. Key labor risks.....	Hata! Yer işareti tanımlanmamış.
4. Brief Overview of Labor Legislation	21
4.1. Summary of Measures to Close the Gap	25
5. Brief Overview of Labor Legislation: Occupational Health and Safety (OHS)	27
5.1. Summary of Measures to Close the Gap	30
6. Responsible Staff.....	35
7. General Policies and Procedures.....	37
7.1. Terms and Conditions of Employment	37
7.2. Code of Conduct	37
7.3. Gender based Violence (GBV)	Hata! Yer işareti tanımlanmamış.
7.4. Age of Employment	38
8. Occupational Health and Safety Procedures.....	39
8.1. Priority order of Introduction of Preventive and Protective Measures.....	39
8.2. Risk Ranking.....	39
8.3. Additional Measures for General Facility Design and Operation	40
8.4. Incident Reporting	40
8.5. COVID-19 Considerations	41
8.6. Monitoring of OHS Implementations	46
9. Grievance Mechanism.....	48
9.1. Workers' Grievance Mechanism	Hata! Yer işareti tanımlanmamış.
9.2. Existing GMs	48
9.3. GM at Project Level	48
9.4. Addressing SEA/SH in GMs	49
9.5. Monitoring and Reporting	50
10. Contractor Management	51

10.1. Contracting phase.....	51
10.2. Implementation Phase	Hata! Yer işareti tanımlanmamış.
11. Primary Suppliers	52
References	53

DRAFT

List of Tables

Table 1: Subcomponents that are covered by LMP	16
Table 2: Gap analysis and measures for legislative framework of labor	21
Table 3: Gap analysis and measures for legislative framework of OHS	27
Table 4: Risk ranking table to classify worker scenarios	39
Table 5: Classification system for accidents and diseases	41

List of Figures

Figure 1: Institutional Arrangement.....	Hata! Yer işareti tanımlanmamış.
Figure 2: Priority order of introduction of preventive and protective measures	39

List of Annexes

Annex 1: Questionnaire for the Prescreening of Contractors.....	Hata! Yer işareti tanımlanmamış.
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List of Abbreviations

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DRAFT

1. Introduction

This Procedure describes the requirements with regard to labor and working conditions applicable during the pre-construction, construction and operation phases of Turkey Climate Smart and Competitive Growth in Agri-food Value Chains, which will be financed by the World Bank, managed, supervised and implemented by Ministry of Agriculture and Forestry (MoAF). It aims to promote fair and equitable labor practices for the fair treatment, non-discrimination and equal opportunity of workers in all sub-projects which are listed in the table below. It aims to protect project workers' rights and ensure the management and control of activities that may pose labor-related risks.

This procedure describes the requirements and expectations in terms of compliance, reporting, roles and responsibilities, monitoring and training with respect to labor and working conditions. This procedure is adopted by MoAF and will be apply to all project workers. It describes how MoAF will comply with the requirements of World Bank Environmental and Social Standard 2 (ESS 2), "Labor and Working Conditions", and with Turkish labor, employment and occupational health and safety laws.

This procedure assesses potential labor risks and impacts and describes how they will be mitigated. MoAF will use commercially reasonable efforts to require project contractors, or other intermediaries procuring labor, to apply this labor management procedure. This is a 'living' document and will be updated further as and when more information becomes available.

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2. Project Background

The Project Development Objective (PDO) is to enhance capacity for sustainable and competitive agricultural growth and promote the use of climate-smart approaches in the agricultural sector in Turkey.

The project will support the agri-food sector in transitioning toward a more climate-smart, inclusive orientation by supporting innovation and the use of smart farming/climate-smart technologies and practices by farmers and agricultural enterprises and by enhancing capacity for sustainable and competitive growth in a range of areas, including: information generation and dissemination to support sustainable soil and land-use planning/management; agricultural data collection and analysis; and animal health aspects. The Project investments are expected to contribute to increased agricultural productivity; increased input and resource-use efficiency; and increased overall agricultural productivity resilience, and sustainability. Project activities will largely focus on the production stages, although a subset of activities (particularly in fruit and vegetable value chains) will promote opportunities for enhancing efficiencies beyond the farm gate.

The project will address these issues through interventions focusing on: (i) enhancing capacities for land-use planning and supporting soil health; (ii) improving agricultural data; (iii) supporting climate-resilient productive infrastructure; (iv) building awareness and supporting validation of climate-smart technologies and practices (including digital technologies) available to farm enterprises and other value-chain actors; (v) supporting data collection and analysis to improve decision making by farmers and stakeholders; (vi) supporting public-private partnerships for technology adoption and improved market access; (vi) strengthening service provision and the overall digital network ecosystem in agriculture in Turkey; and (vii) enhancing monitoring capabilities to assess the impact and benefits of climate smart technologies/practices.

2.1. Project Components

The project will be implemented through four components.

Component 1: Institutional Capacity Strengthening for Climate Smart Agri-food Policy, Planning, and Investments. Activities under this component will support the strengthening of an environment for sectoral planning, with a particular focus on narrowing information gaps in relation to Turkey's soils and land natural capital, to enhance its sustainable planning and management. They will also enhance MoAF's digital blueprint for data collection and information management to support smart policy monitoring and programming. Component funds will mainly support non-consulting and specialized consulting services; acquisition of software/hardware/equipment required and training. Activities under this component will be implemented through two subcomponents.

Subcomponent 1.1: Narrowing information gaps to enhance soil health and land-use planning/management. Subcomponent activities aim at narrowing information and capacity gaps in relation to Turkey's soils/land natural capital, to contribute to their sustainable planning and management. Subcomponent activities will support: i) the generation of key soil and land information needed to inform soil and land classifications, thus, expanding and strengthening the ongoing efforts led by the MoAF in this area; ii) the development of information and tools to strengthen MoAF capacity to monitor soil conversation and land planning; and iii) the preparation and dissemination of land plans/notes to guide land utilization decisions at the provincial level. More specifically, Subcomponent 1.1 will finance technical services to carry out detailed soil surveys and classification studies; laboratory analysis; preparation of maps (soil, threats etc.); soil sample preservation; soil and land information systems spatial data infrastructure and related subcomponents; and preparation of land utilization management plans and land notes. The subcomponent will also invest in equipment and computer infrastructure to enhance management of the large volumes of data and information generated by the project. The activities under this subcomponent are divided into the following output blocks:

(i) Determination of land and soil resources: The subcomponent will strengthen ongoing MoAF's efforts to undertake detail soil surveys and the preparation of soil classifications maps (1:5000 scale) to be carried out in approximately 12.05 million hectares. The soil maps will be

produced using site descriptions, auger controls, and laboratory analysis. In addition to expanding ongoing work by MoAF, the subcomponent will support the establishment of a national soil archive, in alignment with international standards. It will support the identification of soil monitoring sites to generate a dynamic system for periodic monitoring of soil threats, nationally.

(ii) Strengthening of the Digital National Profile Soil Database by hosting soil/land profile information and soil threats thematic maps.

(iii) Establishment of a system and service development for soils and land including the development of policies for data sharing and use, in alignment with international good practice experience; the development of soil-land spatial data infrastructure (SDI) and National Soil & Land Information System; the establishment of National Soil monitoring sub-system for soil selected indicators; and the establishment of Dynamic Modelling/Mapping System. A Geospatial Soil Organic Carbon Information System will also be created (as a submodule of the land and soil information system) specifically designed to develop and guide climate change mitigation and adaptation strategies.

(iv) Classification of lands across the country, according to global and national standards leading to the definition of Turkish agricultural frontier (agricultural land versus other uses). Land classification activities to be supported by the project will cover approximately 69.5 million hectares.

Capacity building activities to targeted users of the soil and land information, will also be supported. Therefore, a set awareness campaigns, and dissemination and training efforts will be undertaken, targeting particularly local provincial governments and provincial Soil Conservation Boards, with specific tools developed by the project to support such dissemination/training efforts. To facilitate data use, subcomponent activities will support upgrading, developing and/or validating user-friendly applications (e.g. via mobile phone) on soil and land information generated by the project. Pilot initiatives to apply the information generated by the project will be supported, including preparation of crop suitability maps at the provincial/regional levels, as well as the design and piloting (in selected regions/provinces) of a decision support system aimed at supporting land use planning processes, based on the soil and land information generated by the project, but also linked to other socioeconomic and environmental aspects.

The soil and land information generated by the project will be used by MoAF to implement provisions included in Regulation No. 30265/2017 on the conservation, use and planning of agricultural land, aimed at preventing soil and land degradation and misutilization. Within MoAF, users of the information generated in this subcomponent include departments with responsibilities in reducing land degradation and erosion, in protecting and enhancing soil carbon and conserving soil biodiversity, etc. The information generated will inform cross-sectoral work on land valuation, guide future land consolidation policies and investments led by MoAF and will provide data for a wide set of land planning processes. The range of external users include mainly local provincial governments and provincial Soil Protection Boards, as well as a wide range of users, including the academy, private sector investors, and farmers.

Subcomponent 1.2: MoAF digital blueprint for sectoral information collection and management.

Activities under this subcomponent will enhance MoAF's capacity for data collection and sectoral information management to support smart climate policy and programs. This subcomponent will strengthen the capacity of MoAF for collecting timely agricultural data and will strengthen the effectiveness of current MoAF information systems. It will also support the development and testing of modelling approaches for monitor crops and yields and provide production forecasts (including also climate factors) for food price monitoring, food security assessments, and other applications.

Component 2: Enhancing animal health capacity for effective disease surveillance and control: This component aims at enhancing animal disease surveillance and control capacity in Turkey. The component will support two main activities: upgrading the infrastructure of regional veterinary control institutes and establishing the National Veterinary Medical Product Control Center. The component will invest in services to support feasibility assessments, works, laboratory equipment, training, and information systems. The specific activities under each subcomponent are described below.

Subcomponent 2.1: Strengthening the capacity of animal health institutes: This activity will support improvements in Turkish network of animal health institutes, specifically in relation to upgrades to biosafety laboratory infrastructure, information systems (including opportunities for digitalization) and capacity building. The network of laboratories targeted under this subcomponent include eight institutes affiliated with the MoAF located in the provinces of Adana, Elazig, Erzurum, Konya, Samsun, Izmir, Istanbul and Ankara. These institutes provide key services on animal disease diagnostics, analysis, research, and training, and also serve as national reference services for specific animal diseases. Laboratories servicing regions and border provinces, where the risks of animal diseases (including zoonotic diseases) are higher such as Adana, Erzurum, Samsun, and Elazig, are inadequate in terms of biosecurity levels preventing them from undertaking diagnostic analysis, disease surveillance and prevention, and research for priority diseases, due to lack of an appropriate environment for safely and securely handle animal disease-related pathogens. The project will specifically support upgrades to the institutes' infrastructure to increase the biosafety level (BSL) of laboratory units. The improved laboratories will also be key to support veterinary faculties and researcher initiatives within Turkey and promote collaborative efforts with neighboring countries on early diagnosis of epidemic diseases threatening Middle East and Asian countries. The project will specifically invest in critical construction work and equipment needs, biosafety, and biosecurity trainings as well as the establishment of a common laboratory information management system for the targeted institutes. A detailed need assessment and analysis of upgrades required will be undertaken during the first year of project implementation. The project will support the development of a national animal-health laboratory policy.

Subcomponent 2.2: Strengthening and improving veterinary medical product control: This subcomponent will support activities to improve the capacity of Turkey to control and regulate veterinary medicines. It will do so, by supporting the establishment of a centralized Veterinary Medical Control Center, bringing together the functions that are now disaggregated through different veterinary institute. Currently, the Directorate General of Food and Control (DGFC) relies on two institutes to implement veterinary medical product oversight: Bornova Institute for vaccines controls and Pendik Institute for drug safety. However, these institutes do not have the animal biosafety level 3 infrastructure and dedicated personnel to perform the necessary control of veterinary medicinal products and target animal studies require for biosafety and lack of appropriate capacity to perform drug surveillance. Furthermore, some of the DGFC affiliated institutes are manufacturers of veterinary medical products, which raises conflict of interest issues. The project will invest in works, equipment, and technical services to build: i) test, analyses and administrative facilities; ii) a national vaccine strain collection bank and ii) experimental animal units. Activities will also support capacity building and training, and some operational costs. The supported installations will meet international accreditation standards. The new institute is expected to be self-sustaining through the provision of fee for services (licensing, GMP inspections, training and expert services, etc.) to private sector i.e. manufactures, importers, exporters etc. The ministry through DGFC will retain its coordination and regulatory role while the institute will perform day to day operations and due diligence. A detailed feasibility assessment will be undertaken the first year of project implementation, analyzing issues of location, technical design, costs and sustainability. It is expected that the construction of the center will be initiated the second year of project implementation.

Component 3: Investments for Enhanced Productivity, Resource-Efficiency, and Climate Resilience. This component will support the dissemination, validation and adoption of CSA technologies and practices, as well as research and development efforts aimed at enhancing agriculture performance by improving productivity,

reducing costs, promoting more efficient resource use (fertilizers, pesticides, energy, water), and improving climate resilience. Investments under this component are also expected to generate key agricultural data to be support decision making by farmers and enterprises and to inform policy design. The encourage the uptake and effective use of innovative/disruptive climate smart technologies by closing knowledge and skill gaps and by providing financial support and technical assistance to producers and enterprises. The investments supported through grants and technical assistance and knowledge sharing are expected to contribute to livelihood opportunities (creating jobs and generating income) and to reduce the overall environmental footprint of the agri-food sector, particularly as related to growing pollution from ineffective input/resource use and GHG emissions. Activities supported under Component 3 will be implemented through four subcomponents.

Subcomponent 3.1: Strengthening climate resilience, productivity, and resource-use efficiency in vegetable value chains. Price and supply fluctuations are a recurrent problem in Turkey's vegetable value chains due to several factors, with climate-related factors playing an increasingly important role. Protected agriculture, through the establishment of greenhouse production has been a priority in Turkey in the past decade, particularly for highly climate sensitive crops such as vegetables. This subcomponent will support ongoing public and private sector efforts to enhance protected agriculture in Turkey for vegetable production, via upgrades on traditional greenhouse infrastructure, improved production management and the piloting of innovative clustering approaches, to enhance the efficiency of protected agriculture and its role on climate resilience, while achieving efficiencies on energy /input use and improving soil health, generating important mitigation co-benefits as well. Improved greenhouse production can also support crop diversification for increased production of higher value and nutrient-rich vegetable products, contributing to nutrition outcomes. This subcomponent will be implemented through two main activities:

a. Modernization of small-scale greenhouse production. Small, family-run greenhouse operations covering less than 0.3 ha of area account for 75% of the greenhouse area in Turkey. Much of this infrastructure is traditional, where average size of glass and plastic greenhouses is 785 m² and 833 m², respectively (Yilmaz et al., 2010). The construction of these greenhouses is also not efficient as they have poor ventilation and heating. As a result, these greenhouses fail to achieve their potential. Moreover, they also receive minimal maintenance, suffer from frequent weather damage (especially in winter), and poor technology and management do not allow for an effective control of phytosanitary problems causing producers to use high levels of pesticides and other inputs, resulting in higher costs, and market access challenges (e.g. increased product rejections and overall food safety risks for consumers domestically and abroad). Investments under Subcomponent 2.1 will improve existing traditional greenhouse infrastructure on small family farms to improve farm profitability per unit area, resource-use efficiency and climate resilience. Matching grants will co-finance the infrastructure investments and technical assistance. These investments are likely to be concentrated in Adana, Antalya, and Aydin subregions, where the bulk of greenhouse production occurs, however, opportunities for expanding investments to other subregions will be considered during project implementation, particularly as a mean to improve smallholder outreach. Subcomponent funds will mainly support construction work linked to upgrading greenhouse infrastructure; acquisition or materials/equipment (roofing, A/C, ventilation, etc.), technical assistance and training.

b. Pilot model for clustering greenhouse production around an efficient energy source (geothermal energy). When geothermal energy replaces fossil fuel in modern ("technology-based") greenhouses, it significantly reduces the costs, energy consumption, and the environmental footprint of greenhouse production. Private firms have established an estimated 440 ha of geothermally heated greenhouses in Turkey. Through the Greenhouse Development Project, prepared in 2019 by MoAF, the GT together with stakeholders set a target to expand the area of geothermally heated greenhouses to 2,500 ha by 2023. The three largest public-private investments to expand this infrastructure operate under the legal framework of the Specialized Greenhouse Industrial Zones Based on Agriculture (Tarima

Dayalı İhtisas Organize Sanayi Bölgesi—TDİOSB). Implementation has been slow owing to the complexities of the governance structure and business model, including challenges related to the participation and capital contributions of various public and private entities and the high costs of building ancillary infrastructure such as recreational and industrial areas, among other factors. Subcomponent 2.1 provides support to pilot an alternative business model with a less complex organizational and governance structure that should make it possible to build infrastructure and mobilize private investors more rapidly, while maintaining the advantages of a cluster. The model will be piloted in at least one site, selected from among the 14 sites where feasibility studies have already been undertaken by the GT/ BÜGEM. Criteria for site selection will be further detail during the first six months of project implementation, but would include technical/financial viability, opportunities to have higher social impacts, no requirements for private land acquisition, demonstrated interest and co-financing opportunities provided by local governments, among others. Subcomponent funds will cover consulting services for zone planning and geological surveys and basic enabling infrastructure (civil infrastructure and construction works such as: geothermal drilling, energy transmission line and network backup power line; potable and utility water, foundation drainage connection line; etc.), as well as studies and analysis of the feasibility of different investment models and dissemination and outreach activities to target partnerships with the private sector.

Subcomponent 3.2: Promoting the adoption of CSA technologies/practices across relevant crops. The objective of this subcomponent is to expand the use of emerging innovative/disruptive CSA and energy-efficient technologies on small and medium farms to enhance the productivity and profitability of farm operations, increase input-efficiencies and reduce carbon footprint and other negative environmental impacts. This subcomponent will primarily focus on awareness creation, dissemination and providing co-funding opportunities for digitally-enabled technologies and solutions (smart and precision agriculture) and energy efficient technologies.

a. Digital CSA technologies. Subcomponent investments will focus on supporting awareness & dissemination activities and investments around emerging digital CSA technologies, including: (i) decision support systems for agriculture production that integrate remote sensing technologies with cloud computing and Internet of Things devices (sensors, field stations); (ii) variable-rate technology to apply agricultural inputs; and (iii) digitally assisted steering systems to optimize field operations, and (iv) harvesting losses (specifically in wheat and cotton). Subcomponent activities will aim at expanding the use of readily available commercial technologies in partnership with the private sector and will cover co-sharing the costs of acquiring equipment/machinery and related goods, license fees for remote sensing and cloud-based analytical services, and training. The focus will be on technologies that are suitable for small and medium farm enterprises, either through direct adoption by individual producers or by sharing equipment across farms and facilitating access to related services. In the case of harvesting losses, the focus will be on generating incentives to optimize harvesting practices by service providers. Increased access to CSA digital technologies will optimize the use of fertilizer, pesticides, water, and energy, will reduce harvest losses and increase farm profitability reducing pollution and GHG emissions.

b. Solar energy as an alternative power source for pump irrigation systems. Although it varies according to the type of production, the energy need constitutes an important input cost in agricultural production in Turkey. Energy costs for irrigation has emerged as a critical problematic area and have created a major financial burden for the irrigation cooperatives. The subcomponent will co-finance the establishment of solar energy systems to substitute for side fuels as well as the adoption of digital tools to enable more efficient irrigation scheduling based on real-time information through soil moisture sensors and digital weather stations. Solar energy is a much cheaper source of energy and the switch from fossil fuels has important climate co-benefits. Furthermore, achieving water efficiency is a key adaptation

measured in Turkey. The focus will be on the provinces with the highest density of irrigation cooperatives, such as Konya, Afyonkarahisar, Mersin, Burdur, Eskisehir, Manisa, and Amasya. According to a recent MoAF survey, 72% of the 1,369 responding irrigation cooperatives used pressurized irrigation systems and half of the respondents used groundwater. To ensure a sustainable use of ground and surface water, measures will be implemented such as: the use of hardwired abstraction controls, introduction of volumetric metering, and – possibly - other measures to increase irrigation efficiency. During the first year of implementation, support will be deployed to a selected number of cooperatives, with lessons learned systematized, particularly around water consumption patterns, before deploying support to a much larger scale.

The focus of the subcomponent activities will be to demonstrate and innovate, with careful attention paid to assure replicability and inform policies. For digital CSA technologies, a matching grant (cost-sharing) mechanism will be established, with separate windows (to be defined) targeting four groups of users: (i) individual farmers; (ii) producer organizations; (iii) agribusinesses working with contracted farmers; and (iv) private service providers targeting small and medium farm enterprises. Targeting approaches will be implemented to ensure that female farmers, producer organizations with women members, agribusinesses owned by women, and private service providers owned by women or with experience in working with women owned or staffed enterprises participate in the matching grants scheme. The grant windows for groups two through four will facilitate access to technologies and related services by smaller farmers who may be unable to purchase and use them effectively on an individual basis. Matching grant support is demand driven. Depending on the technology, focus will be on field and industrial crops as well as on orchards and other tree crops (e.g., grapes, olives). Training and capacity building, implemented in close partnership with technology providers, universities and other relevant entities, will complement the grant program and target a wide range of stakeholders, including: (i) MoAF staff at the provincial level (especially extension agents); (ii) farmers and their associations; and (iii) other trainers and service providers, to build local capacity. Information and communication technology (ICT) will be used to strengthen an innovation network to exchange knowledge and information that can support dissemination. This network will include a web-based platform providing a one-stop shop for smart and precision agriculture solutions targeting different problems and uses. This platform will also facilitate data sharing between farmers, service providers, other actors and the Ministry. Protocols for data protection and sharing will be developed. Project funds will mainly support acquisition of equipment/machinery and related goods, license fees for remote sensing and cloud-based analytical services, training and specialized consulting services. The subcomponent will also operate an incentive scheme to reduce harvester losses, working together with the association of private harvesters. For the solar and irrigation activities, the subcomponent will also deploy a grant mechanism targeted to irrigation cooperatives.

Subcomponent 3.3: Enhancing the productivity and greening profile of cattle production in Turkey.

Nearly 70% of cattle milk production in Turkey comes from farms with fewer than 50 cows; of those farms, 71% (about 264,500) have fewer than 10 cows and contend with significant management and profitability problems, leading to disease outbreaks and low productivity. Furthermore, increasing concerns, globally and nationally, on the negative environmental impacts of cattle production on climate change and water pollution, represent a challenge but at the same time an opportunity to push forward an agenda around greening the sector. Investments under Subcomponent 3.3 will complement ongoing efforts by MoAF to improve livestock productivity (for example, efforts around pasture reclamation and management, as well as, for the modernization of barns and improvement of animal genetics), with additional support focusing on innovative technology-based approaches to enhance productivity, sustainability and climate resilience. It will do so by supporting two strategies: the piloting and implementation of a Precision Livestock Farming (PLF) program and the implementation and piloting of innovative approaches on manure management.

a. Piloting of a Precision Livestock Farming (PLF) program. Throughout the world, PLF is gaining recognition for its use of digital technology to precisely calibrate livestock production

and productivity parameters reducing costs, supporting animal health and welfare, improving food safety (by reducing the risk of antibiotic overuse), reducing pollution and GHG emissions. Subcomponent 3.3a will provide technical and financial incentives (via matching grants) to support the uptake of PLF, targeting particularly small and medium farm enterprises, including equipment and technology such as electronic sensors, measurement devices, controls, and data processing. These technologies will be prioritized based on the specific problems to be addressed, which will be identified through a participatory process involving farmers, dairy processing companies, and private service providers. Activities will also support the further strengthening of the associated services for the adoption of PLF (e.g. installation and operation of equipment, data analytics, etc.), which will create jobs and attract young people with an interest in applying innovative digital technologies to animal production. Based on lessons from applying this technology in the EU, USA, and elsewhere, the PLF program will be implemented in a stepwise manner, beginning with small groups of farmers and gradually moving to larger groups (potentially reaching 5,000 farmers altogether). The novel aspects of this program include: (i) training a large number of farmers to use PLF technology; (ii) monitoring animals continuously over a long period and many production cycles (data are expected to be collected for 15,000 production cycles); (iii) developing and providing semi-automated feedback to farmers, alerting them to problems that should be addressed; and (iv) collecting data for statistical analysis of the impacts of PLF technologies on farmers' livelihoods and households and on the environment, which will be critical to inform policy decision making. A team of specialized staff within MoAF will be hired to coordinate the implementation of the PFL program. Subcomponent funds will support equipment/technology for dairy farms (via a matching grant program) and related data analytics and technical backstopping, training & demonstrations, and specialized consulting services.

b. Reducing cattle production pressures on water pollution and GHG emissions. The subcomponent will focalize work on the Küçük Menderes sub-basin (in the Aegean region) identified by MoAF as a Nitrated Vulnerable Zone (NVZ), particularly in the provinces of Odemis, Tire, Kiraz and Torbali. Water pollution in the sub-basin results mainly, from the presence of a significant amount of medium/large sized cattle farms. The main source of contamination comes from improper manure management, which also generates important GHG emissions. Overall, the lack of efficient manure management contributes importantly to water pollution, but also to GHG emissions in Turkey, as of the total emissions from agriculture, 13% are from methane mainly from livestock (cattle); and the sector contributes 62.4% of the country methane emissions.

Livestock enterprises in the sub-basin and across Turkey, currently do not have proper manure collection/storage facilities in compliance with Good Agriculture Practice (GAP) code. This is due to the lack of suitable areas to build manure storage facilities on-farm and to other logistical (e.g. distance for manure collection), knowledge and financial challenges. The subcomponent activities will focus on piloting and promoting innovative approaches for manure management, including: establishment of an information network of relevant stakeholders to share experience and knowledge around manure management, including on new and evolving technology for manure treatment/reuse; support the piloting/testing of innovative emerging technologies, and enhance capacities of professionals to support manure management plans/monitoring (e.g. through training and certification programs); and piloting incentives/approaches for sustainable manure management, including undertaken a pilot for encouraging third-party manure collection and processing, potentially linked to biogas generation, and narrowing information gaps to inform policy/regulatory action. The subcomponent will finance construction works and equipment to set up the manure-energy-biofertilizer facility as well as equipment for transportation and application of biofertilizer in fields; training and demonstrations.

Subcomponent 3.4: Research and innovations to support CSA. While subcomponent 3.2 will focus on validating and mainstreaming commercially available technologies, this subcomponent focuses on the development, validation and/or dissemination of in-house (by TAGEM) climate/green agricultural technologies. Activities under this subcomponent will support the implementation of a research and innovation agenda around CSA in alignment with priorities identified in the recently launched Green Deal Plan, by the Turkish government, including reducing the use of pesticides; enhancing nutrient management (through biofertilizers), and enhancing energy and water efficiencies and support climate-related assessments. The subcomponent will support research, validation and dissemination efforts around Integrated Pest Management systems (particularly for export crops, facing significant rejections in export markets (peppers, citrus, tomato)); expanding the use of biofertilizers (particularly around legume crops) to enhance fertilizer management and reduce the use of chemical fertilizers; undertaking other climate-related dissemination activities around energy-saving technologies produced by TAGEM (e.g. solar milking prototype), and carrying out climate assessments to create awareness around climate impacts in crops, and on the opportunities for reducing the water and carbon footprint of key priority value chains and optimize crop planning (e.g. based on water needs). The subcomponent will also support TAGEM's research, development, and innovation (RD&I) agenda on irrigation and drainage, aimed at optimizing water use and reduce pollution. This will be done by strengthen the Izmir International Agricultural Research and Training Center (UTAEM), positioning it to serve as a reference center for irrigation and drainage technology RD&I and to work with state-of-the-art equipment and private providers of irrigation and drainage technology in the region.

Component 4: Project Management, Monitoring, and Evaluation. Activities under this component will support all project management functions. It will include support for a Project Coordination Unit (PCU) under ABDGM, and Project Implementation Units (PIUs) under TRGM, DGIT, BUGEM, TAGEM, HAYGEM and DGFC, for (i) strengthening capacity for day-to-day project management of technical, fiduciary, Monitoring and Evaluation (M&E), E&S issues; (ii) E&S risk management, including preparation of site-specific E&S instruments required; (iii) grievance redress, citizen engagement, and communications; and (iv) M&E of project activities, including impact assessments, beneficiary satisfaction surveys, and development of an integrated system for project management and monitoring of project outputs and outcomes.

Table 1 provides summary of the subcomponents' descriptions to which this Labor Management Procedure (LMP) will be applied.

Table 1: Summary of the project components, activities and lead implementing agencies

Subcomponent	Lead Implementing Agency	Activity
Component 1: Institutional Capacity Strengthening for Climate Smart Agri-food Policy, Planning, and Investments		

Subcomponent	Lead Implementing Agency	Activity
Subcomponent 1.1: Narrowing information gaps to enhance soil health and land-use planning/management	TRGM	Determination of land and soil resources <ul style="list-style-type: none"> • Soil surveys, Mapping & Classification • Development of detailed soil maps (1:5K) • Laboratory analysis • Identification of the soil monitoring sites • Establishment/Strengthening the National Soil Archive Facility Development of the Digital National Soil Profile Database <ul style="list-style-type: none"> • Development of national harmonized soil profile database • Production of soil property and threat maps System and Service Development <ul style="list-style-type: none"> • Development of data sharing & use policy • Development of soil-land spatial data infrastructure (SDI) and National Soil & Land Information System • Establishment of national soil monitoring sub-system for selected indicators • Establishment of Dynamic Modelling/Mapping System Improved classification of lands <ul style="list-style-type: none"> • Development of land plans/notes and land classification • Establishment of Decision Support System (DSS) to delineate absolute agricultural lands and alternatives for non-agricultural land use Capacity building activities <ul style="list-style-type: none"> • Awareness campaigns • Dissemination and training efforts
Subcomponent 1.2: MoAF digital blueprint for sectoral information collection and management	DGIT	<ul style="list-style-type: none"> • Capacity strengthening for collecting timely agricultural data • strengthening the effectiveness of current information systems • development and testing of modelling approaches for monitor crops and yields • provide production forecasts for food price monitoring, food security assessments
Component 2: Enhancing Animal Health Capacity for Effective Disease Surveillance and Control		
Subcomponent 2.1: Strengthening the capacity of animal health institutes	GDPC	<ul style="list-style-type: none"> • Upgrading institutes' infrastructure to increase the biosafety label (BSL) of laboratory units • Establishment of a common laboratory information management system for the targeted institutes • Capacity building
Subcomponent 2.2: Strengthening and improving veterinary medical product control		<ul style="list-style-type: none"> • Establishment of a centralized Veterinary Medical Control Center <ul style="list-style-type: none"> ○ test, analyses and administrative facilities ○ national vaccine strain collection bank ○ experimental animal units
Component 3: Investments for Enhanced Productivity, Resource-Efficiency, and Climate Resilience		
Subcomponent 3.1: Strengthening climate resilience, productivity, and resource-use efficiency in vegetable value chains	a) Modernization of small-scale greenhouse production b) Pilot model for clustering greenhouse production around an efficient energy source (geothermal energy)	BÜGEM <ul style="list-style-type: none"> • Improvement of existing traditional greenhouse infrastructure • Capacity building <ul style="list-style-type: none"> • Zone planning • Geological surveys • Basic enabling structure <ul style="list-style-type: none"> ○ Geothermal drilling ○ Energy transmission line and network backup power line ○ Potable and utility water ○ Foundation drainage connection line • Feasibility studies for different investment models

Subcomponent		Lead Implementing Agency	Activity
Subcomponent 3.2: Promoting the adoption of CSA technologies / practices across relevant crops	a) Digital CSA technologies	TRGM	<ul style="list-style-type: none"> • DSSs for agriculture production that integrate remote sensing technologies with cloud computing and IoT devices (sensors, field stations) • Variable-rate technology to apply agricultural inputs • Digitally assisted steering systems to optimize field operations • Harvesting losses • Capacity building
	b) Solar energy as an alternative power source for pump irrigation systems		<ul style="list-style-type: none"> • Establishment of solar energy systems • Adoption of digital tools • Capacity building
Subcomponent 3.3: Enhancing the productivity and greening profile of cattle production in Turkey	a) Piloting of a Precision Livestock Farming (PLF) program	HAYGEM	<ul style="list-style-type: none"> • Support the uptake of PLF • Strengthening of the associated services for the adoption of PLF • Capacity building
	b) Reducing cattle production pressures on water pollution and GHG emissions	TRGM	<ul style="list-style-type: none"> • Establishment of an information network • Supporting the piloting/testing of innovative emerging technologies • Enhancing capacities of professionals to support manure management plans/monitoring • Piloting incentives/approaches for sustainable manure management • Capacity building
Subcomponent 3.4: Research and innovations to support CSA		TAGEM	<ul style="list-style-type: none"> • Research, validation and dissemination efforts around Integrated Pest Management systems • Expanding the use of biofertilizers • Undertaking other climate-related dissemination activities around energy-saving technologies produced by TAGEM • Carrying out climate assessments. • RD&I agenda on irrigation and drainage, aimed at optimizing water use and reduce pollution.
Component 4: Project Management, Monitoring, and Evaluation			
Component 4: Project Management, Monitoring, and Evaluation		ABDGM	<ul style="list-style-type: none"> • Strengthening capacity for day-to-day project management of technical, fiduciary, Monitoring and Evaluation (M&E), E&S issues; • E&S risk management, including preparation of site-specific E&S instruments required; • grievance redress, citizen engagement, and communications; and • M&E of project activities, including impact assessments, beneficiary satisfaction surveys, and development of an integrated system for project management and monitoring of project outputs and outcomes.

3. Overview of Labor Use in the Project

The Environmental and Social Standard (ESS) 2 of the Environmental and Social Framework (ESF) Labor and Working Conditions categorizes the workers into four (4) categories:

- A **direct worker** is a worker with whom the Borrower has a directly contracted employment relationship and specific control over the work, working conditions, and treatment of the project worker. The worker is employed or engaged by the Borrower, paid directly by the Borrower, and subject to the Borrower's day-to-day instruction and control. Examples of direct workers may include persons employed or engaged by the Borrower's project implementation unit to carry out design and supervision, monitoring and evaluation, or community engagement in relation to the project.
- A **contracted worker** is a worker employed or engaged by a third party to perform work or provide services related to the core functions¹ of the project, where the third-party exercises control over the work, working conditions, and treatment of the project worker. In such circumstances, the employment relationship is between the third party and the project worker, even if the project worker is working on an ongoing basis on project activities.
- A **primary supply worker** is a worker employed or engaged by a primary supplier², providing goods and materials to the project, over whom a primary supplier exercises control for the work, working conditions, and treatment of the person. As part of the definition of the primary supplier, there is a requirement that the goods or materials be provided directly to the project for its core functions on an ongoing basis. This means that second, third, and further levels of the supply chain (sometimes referred to as Tier 2 and Tier 3 suppliers) are not covered by ESS2.
- **Community workers.** They are employed or engaged in providing community labor.

ESS2 applies to project workers including full-time, part-time, temporary, seasonal and migrant workers .

3.1. Type of Project Workers

In this project, community workers are not anticipated to be engaged in project activities. The application of definition of workers in ESS2 to Project is:

- **Direct workers** will be the staff of the MoAF are engaged in the project and if externally hired, the staff of PCU and PIUs. While, the staff of the General Directorates will mainly engage in investment, site selection, plan, tendering and monitoring activities and will be subject to Civil Servants Law (No. 657), PCU and PIUs will host a dedicated multidisciplinary team of project management, technical, financial management, procurement, environmental, and social specialists. Externally hired specialists will be subject to Labor Law (No: 4657).
- **Contracted workers** will be the workers of the contractors and their subcontractors. They will be engaged during the implementation of the Project activities. These are employees of
 - IT companies that will provide database and software related services
 - soil survey companies
 - construction firms
 - training firms
- **Primary supply workers** will be the workers of the firms which on ongoing basis, will provide directly to the project goods or materials essential for the core functions of the project such as employees of
 - third-party companies that will provide machinery and/or hardware for the micro-scale investment component of the project
 - companies that will provide computers, servers and security-related equipment
 - companies that provide licenses for the software
 - soil laboratories

¹ Core functions' of a project constitute those production and/or service processes essential for a specific Project activity without which the project cannot continue.

² Primary suppliers' are those suppliers who, on an ongoing basis, provide directly to the project goods or materials essential for the core functions of the project.

3.2. Number of the Project Workers

Direct Workers. The total number of direct workers who will be involved in the implementation of the project activities is estimated to be around 100-150, including both PIU and PCU experts that will be hired and dedicated MoAF staff.

Contracted Workers. The number of contracted workers to be employed as part of soil surveys, civil works, database/software services and training is not yet known. This will be determined during the implementation phase of the Project.

Primary Supply Workers. The number of primary supply workers who will be employed by primary suppliers of the project is currently not known. This will become known when project implementation started and determined through the agreement between MoAF and primary suppliers.

3.3. Timing of Labor Requirements

Direct workers will be engaged from the beginning of the project and will work full time throughout the duration of the project. Contracted workers will be recruited on an activity basis as a result of the tender. Working duration will be different for each activity, but they will generally be employed full time.

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4. Brief Overview of Labor Legislation

The main national law governing the terms and conditions of labor is Labor Law no. 4857 which aims to regulate the rights and responsibilities of employers and workers employed on the basis of an employment contract regarding working conditions and working environment. However, as it is stated in Article 4, this Law does not cover below works and work relations;

- a) Sea and air transport works,
- b) In workplaces or enterprises where agricultural and forestry works are carried out with less than 50 workers (including 50),
- c) All kinds of construction work related to agriculture within the boundaries of the family economy (except construction works in agricultural enterprises),
- d) Among the members of a family and their relatives up to the 3rd degree (including the 3rd degree) in houses and in the works where handicrafts are made, with no outside participation,
- e) In domestic services,
- f) About apprentices,
- g) About the athletes,
- h) About those who have been rehabilitated,
- i) In workplaces where three people work in accordance with the definition of Article 2 of the Law No. 507 on Tradesmen and Craftsmen

Among above works and work relations, the Project may cover the works and work relations to (b) in workplaces or enterprises where agricultural and forestry works are carried out with less than 50 workers (including 50), and (c) all kinds of construction work related to agriculture within the boundaries of the family economy, thus for those kinds of works and work relations that Labor Law no. 4857 does not cover, this Labor Management Procedures should be applied.

The gaps between the Labor Law no. 4857 and related regulations, the requirements of ESS 2-Labor and Working Conditions, and the measures to close the gaps are given in Table 2. The list of legislations used to make gap analysis on labor are given below of which related articles are referenced in the Table 2.

- Labor Law (No: 4857).
 - Subcontracting Regulation (27.09.2008/27010)
 - Annual Paid Leave Regulation (03.03.2004/2539)
 - Vulnerable Workers
 - Regulation on the Procedures and Principles of Employing Child and Young Workers (06.04.2004/25425)
 - Regulation on Working Conditions of Female Employees in Night Shifts (24.07.2013/28717)
 - Regulation on Work Placement Services within Nation (25.04.2009/27210) (working conditions of people with disabilities)
 - Regulation on Working Conditions of Pregnant or Nursing Women, Nursing Rooms and Child Care Dormitories (16.08.2013/28737)
- Unions and Collective Bargaining Law (Law No: 6356)
- Turkish Penal Code (No. 5237) (about forced labor)

Since the minimum age of employment for the project activities that are covered in this LMP is 18, provisions for child labor are not reviewed. However, in general there are no gaps between the requirements of ESS2 and national legislations on child labor.

Table 2: Gap analysis and measures for legislative framework of labor

Issue	ESS2	National Policy and Identified Gaps	Measures to Close the Gap
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Issue	ESS2	National Policy and Identified Gaps	Measures to Close the Gap
Terms and conditions of employment	At the beginning of the working relationship, Project workers will be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment, which will be updated when any material changes. (Paragraph 10)	Employment contracts <u>with a duration of one year or more</u> must be made in writing (Article 8, Law no. 4857) The employer should notify the employee about the changes in the working conditions and term of employment through written documents. (Article 22, Law no. 4857)	In all work relations irrespective of their durations, terms and conditions of employment will be documented and signed.
Wage and payment of wages	Project workers will be paid on a regular basis. (Paragraph 11)	The workers will be paid on regular basis. (Article 32, Law no. 4857)	No additional measure is needed
Wage cut penalty	Project workers will be informed of the conditions under which such deductions from payment of wages will made. (Paragraph 11)	The employer cannot impose a wage cut penalty to the worker, except for the reasons indicated in the collective agreement or employment agreements. (Article 38, Law no. 4857)	No additional measure is needed
Rest per week	Project workers will be provided with adequate periods of rest per week. (Paragraph 11)	Workers are given at least twenty-four hours of uninterrupted rest within a seven-day period, provided that they have worked on the working days (Article 46, Law no. 4857)	No additional measure is needed
Annual holiday	Project workers will be provided with annual holiday. (Paragraph 11)	Employees who have worked at the workplace for at least one year from the day they started to work, including the trial period, are given annual paid leave. (Article 53, Law no. 4857)	No additional measure is needed
Sick leave	Project workers will be provided with sick leave. (Paragraph 11)	Article 46 and Article 55 of Law no. 4857 states that sick and rest leave with a doctor's report are counted as worked days.	No additional measure is needed
Maternity leave	Project workers will be provided with maternity leave. (Paragraph 11)	It is essential that female workers not be employed for a total of sixteen weeks, eight weeks before delivery and eight weeks after delivery. (Article 74, Law no. 4857)	No additional measure is needed
Family leave	Project workers will be provided with family leave. (Paragraph 11)	Upon her request, the female worker is given unpaid leave for up to six months after the completion of the sixteen-week period for family leave. (Article 74, Law no. 4857)	No additional measure is needed

Issue	ESS2	National Policy and Identified Gaps	Measures to Close the Gap
Termination of employment	Project workers will receive written notice of termination of employment and details of severance payments in a timely manner. All wages that have been earned, social security benefits, pension contributions, and any other entitlements will be paid on or before termination of the working relationship, either directly to the project workers or where appropriate, for the benefit of the project workers. (Paragraph 12)	<p>The termination of the employment contract will be notified to the employee. (Article 17, Law no. 4857)</p> <p>Upon the termination, the employer has to give the employee a slip showing the day of the payment and the period it relates to, the amount of any additions to the main wage such as overtime, weekday holidays, holidays and general holiday wages and all kinds of deductions such as taxes, insurance premiums, advance deductions, alimony and enforcement that are shown separately. (Article 37, Law no. 4857)</p>	No additional measure is needed
Nondiscrimination and Equal Opportunity	Decisions relating to the employment or treatment of project workers will not be made on the basis of personal characteristics unrelated to inherent job requirements (Paragraph 13)	No discrimination based on language, race, color, gender, disability, political opinion, philosophical belief, religion, sect and similar reasons can be made in the working relationship. (Article 5, Law no. 4857)	“Age” will be specified as one of the discrimination factors.
Harassment, Intimidation, and/or Exploitation	The labor management procedures will set out measures to prevent and address harassment, intimidation, and/or exploitation. (Paragraph 13)	No provisions for preventing and addressing harassment, intimidation, and/or exploitation.	Employer should place preventive measures for harassment in its contracts in order to increase awareness on the sexual harassment. These should include the definition and type of sexual harassment.

Issue	ESS2	National Policy and Identified Gaps	Measures to Close the Gap
Vulnerable Workers	Provide appropriate measures of protection and assistance to address the vulnerabilities of project workers, including specific groups of workers, such as women, people with disabilities, migrant workers, and children (of working age). (Paragraph 15)	<p>There are various articles in Labor Law no. 4857 and regulations which aims safe working environments for vulnerable groups, such as;</p> <ul style="list-style-type: none"> • Regulation on the Procedures and Principles of Employing Child and Young Workers • Regulation on Working Conditions of Female Employees in Night Shifts • Regulation on Working Conditions of Pregnant or Nursing Women, Nursing Rooms and Child Care Dormitories • Regulation on Work Placement Services within Nation (working conditions of people with disabilities) 	No additional measure is needed.
Workers' Organizations	The employer will not discriminate or retaliate against project workers who participate, or seek to participate, in such workers' organizations and collective bargaining or alternative mechanisms. (Paragraph 16)	<ul style="list-style-type: none"> • Recruitment of workers cannot be made conditional on joining or not joining a certain union, continuing or withdrawing from a certain union, or being or not being a member of any union. • The employer cannot make any distinction between workers who are members of a union and workers who are not members of a union or workers who are members of separate unions in terms of working conditions or termination of employment. • Workers cannot be dismissed or subjected to different treatment because they are members of a union or not, participate in the activities of workers' organizations outside working hours or with the employer's permission, or engage in union activities. <p>(Article 25, Law no.6356)</p>	No additional measure is needed.

Issue	ESS2	National Policy and Identified Gaps	Measures to Close the Gap
Forced Labor	Forced labor, which consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty, will not be used in connection with the project. (Paragraph 20)	Turkey has ratified the ILO Convention No. 29 on Forced Labor and ILO Convention No. 105 on the Abolition of Forced Labor. Article 80 “Human trafficking” of Turkish Penal Code No. 5237 clearly states that forced labor is forbidden. YİMER (Foreigners Communication Center – Yabancılar İletişim Merkezi), where foreigners can find answers to all their questions about visa, residence permit, international protection, temporary protection; also serves as a denouncement and helpline for the identification of victims of human trafficking.	In order to avoid implicit forced labor in the Project, the Borrower should maintain regular audits on site and closely monitor vulnerable workers including those from foreign nationals.

4.1. Summary of Measures to Close the Gap

There are only few gaps identified between the provisions of Labor Law no. 4857 and its related regulations, and the requirements of the ESS 2-Labor and Working Conditions, which are summarized below. However, weak enforcement and monitoring of the Law and the related regulations should require close monitoring. The gaps and the measures to close the gaps are;

- The law requires that employment contracts with a duration of one year or more must be made in writing. However, within the project, the working conditions and terms of employment of all work relations irrespective of their durations shall be documented and signed, before the commencement of the work according to the Article 8 of the Labor Law no. 4857 with taking into consideration below special situations;
 - If the worker is illiterate, the working conditions and terms of employment will be explained through oral communication and it will be retained through records of meetings held or notices placed on a workers bulletin board.
 - If the worker states that his/her proficiency of Turkish is not enough to understand legal documents, in addition to legal documents, the translation will be provided in the language that he/she asks for.
- According to Article 5 “Equal treatment principle” of the Labor Law no. 4857 although, no discrimination based on language, race, color, gender, disability, political opinion, philosophical belief, religion, sect and similar reasons can be made in the working relationship, “age” is not specified as one of the discrimination factors. So, as a part of this LMP, there should be no discrimination with respect to age in addition to other factors stated in Article 5 of the Labor Law no. 4857.
- although, sexual harassment is one of the reasons for the termination of contract according to Labor Law no. 4857, there are no preventive measures in legislations. Employer should place preventive measures for harassment in its contracts in order to increase awareness on the sexual harassment.
- Article 80 “Human trafficking” of Turkish Penal Code No. 5237 clearly states that forced labor is forbidden. YİMER (Foreigners Communication Center – Yabancılar İletişim Merkezi), where foreigners can find answers to all their questions about visa, residence permit, international protection, temporary protection; also serves as a denouncement and helpline for the identification of victims of human trafficking.

In order to avoid implicit forced labor in the Project, the Borrower should maintain regular audits on site and closely monitor vulnerable workers including those from foreign nationals.

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5. Brief Overview of Labor Legislation: Occupational Health and Safety (OHS)

The main national governing the terms and conditions of occupational health and safety in Turkey is Occupational Health and Safety Law no. 6331 which aims to regulate the duties, authorities, responsibilities, rights and obligations of employers and employees in order to ensure occupational health and safety at workplaces and to improve existing health and safety conditions. Other regulations that can be evaluated within the context of the Project are (but not limited to);

- Regulation on the Use of Personal Protective Equipment in Workplaces
- Regulation on the Procedures and Principles of Employee’s Occupational Health and Safety Training
- Regulation on Occupational Health and Safety Committees
- Regulation on Occupational Health and Safety in Construction Works
- Regulation on Occupational Health and Safety Risk Assessment

The gaps between the Occupational Health and Safety Law no.6331 and related regulations, the requirements of ESS 2-Labor and Working Conditions, and the measures to close the gaps are given in Table 3.

Table 3: Gap analysis and measures for legislative framework of OHS

Issue	ESS2	National Policy and Identified Gaps	Measures to Close the Gap
Identification of potential hazards	Potential hazards should be identified in order to eliminate sources of risk or minimize project workers’ exposure (Paragraph 25)	A risk assessment is made in terms of occupational health and safety. (Article 10, Law no. 6331)	No additional measure is needed
Provision of preventive and protective measures	Appropriate protective measures should be included in the project’s OHS measures and adequate PPE should be provided to the worker at no cost. (Paragraph 25)	Occupational health and safety measures and protective equipment that should be used are determined according to result of risk assessment. (Article 10, Law no. 6331) PPE is provided to the worker at no cost. (Article 6, “Regulation on the Use of Personal Protective Equipment in Workplaces”)	No additional measure is needed
Training of workers	Workers should receive OHS training at the start of their employment or engagement, and thereafter on a regular basis and when changes are made in the workplace, with records of the training kept on file. (Paragraph 25)	Employees receive occupational health and safety training before starting work, in case of a change in workplace or job, in case of a change in work equipment or in case of application of new technology. The trainings are renewed in accordance with the changing and emerging risks, and are repeated when necessary and at regular intervals. (Article 17, Law no. 6331) These trainings are recorded with the attendance record. (Article 5, Regulation on the Procedures and Principles of Employee’s Occupational Health and Safety Training)	No additional measure is needed

Issue	ESS2	National Policy and Identified Gaps	Measures to Close the Gap
Documentation of occupation related health issues	Occupational accidents, diseases and incidents will be documented and reported. (Paragraph 25)	All work accidents and occupational diseases are recorded, reported and submitted to the Social Security Institution. (Article 14, Law no. 6331)	No additional measure is needed
Emergency	Emergency prevention and preparedness and response arrangements to emergency situations will be designed and implemented. (Paragraph 25)	Necessary measurements and evaluations are made to protect workers from the negative effects of emergencies, and emergency plans are prepared. With regard to emergencies, training and practices are carried out by assigning a sufficient number of people who are appropriately equipped and trained in these matters, and it is ensured that the teams are always kept ready. Necessary arrangements are made to establish contact with organizations outside the workplace on first aid, emergency medical intervention, rescue and firefighting. (Article 11, Law no. 6331)	No additional measure is needed
Remedies	Remedies for adverse impacts such as occupational injuries, deaths, disability, and disease will be designed and implemented. (Paragraph 25)	???? Article 14'ün buna işaret ettiğinden emin olamadım.	
Consulting with project workers	All parties will actively collaborate and consult with project workers in promoting understanding, and methods for, implementation of OHS requirements. (Paragraph 26)	An employee representative is appointed among the employees through election or by appointment in cases where it cannot be determined by election. (Article 20, Law no. 6331) Employee representatives take part in occupational health and safety committee. (Article 6, Regulation on Occupational Health and Safety Committees)	No additional measure is needed

Issue	ESS2	National Policy and Identified Gaps	Measures to Close the Gap
Right to abstain from work	Workers will report work situations that they believe are not safe or healthy, and remove themselves from a work situation which they have reasonable justification to believe presents an imminent and serious danger to their life or health. Project workers who remove themselves from such situations will not be required to return to work until necessary remedial action to correct the situation has been taken. Project workers will not be retaliated against or otherwise subject to reprisal or negative action for such reporting or removal. (Paragraph 27)	Employees who are faced with a serious and imminent danger can apply to the board, and in workplaces where there is no board, to the employer, and request the determination of the situation and the decision to take the necessary measures. If the Board or the employer decides in the direction of the employee's request, the employee may refrain from working until the necessary measures are taken. In cases where the serious and imminent danger is unavoidable, the employees leave the workplace or the dangerous area without having to comply with the procedure in the first sentence and go to the designated safe place. Employees' rights cannot be restricted due to these actions. (Article 13, Law no. 6331.)	No additional measure is needed
Facilities	Project workers will be provided with facilities appropriate to the circumstances of their work, including access to canteens, hygiene facilities, and appropriate areas for rest. (Paragraph 28)	<p>In workplaces with more than ten employees, there will be a resting place, changing cabin, and separate toilets for men and women. (Annex 1, Regulation on Business Opening and Working Licenses)</p> <p>Project workers will be provided with facilities appropriate to the circumstances of their work, hygiene facilities, and appropriate areas for rest. (Annex 1, Regulation on Occupational Health and Safety in Construction Works)</p>	No additional measure is needed

Issue	ESS2	National Policy and Identified Gaps	Measures to Close the Gap
	<p>Where project workers are employed or engaged by more than one party and are working together in one location, the parties who employ or engage the workers will collaborate in applying the OHS requirements, without prejudice to the responsibility of each party for the health and safety of its own workers. (Paragraph 29)</p>	<p>In case there are more than one employer in the same work area and more than one committee is formed by these employers, the employers inform the other employers about the board decisions that may affect each other's work. (Article 22, Law no. 6331.</p> <p>If more than one employer shares the same workspace, employers cooperate in the implementation of occupational hygiene and occupational health and safety measures, carries out the prevention and protection of occupational risks in coordination, taking into account the structure of the work done, and informs each other and employee representatives about these risks. (Article 23, Law no. 6331.)</p>	
Regular review	<p>A system for regular review of occupational safety and health performance and the working environment will be put in place and include identification of safety and health hazards and risks, implementation of effective methods for responding to identified hazards and risks, setting priorities for taking action, and evaluation of results. (Paragraph 30)</p>	<p>The risk assessment is renewed at different times depending on the hazard class or in case of a change in the working environment, work accident, occupational disease or near-miss event, etc. (Article 12, Regulation on Occupational Health and Safety Risk Assessment)</p>	No additional measure is needed

5.1. Summary of Measures to Close the Gap

No gap is identified between the provisions of Occupational Health and Safety Law no.6331 and related regulations, and the requirements of the ESS 2-Labor and Working Conditions, Therefore, this LMP is prepared to ensure all measures and provisions those should be considered throughout project implementation will be applied.

6. Assessment of Key Potential Labor Risks

6.1. Project activities

There will be various activities in various locations during the implementation of the project. The activities and their locations are given in Table 4.

Table 4: Project activities and locations

Subcomponent	Activity	Location
Component 1: Institutional Capacity Strengthening for Climate Smart Agri-food Policy, Planning, and Investments		
Subcomponent 1.1: Narrowing information gaps to enhance soil health and land-use planning/management	<p>Determination of land and soil resources</p> <ul style="list-style-type: none"> • Soil surveys, Mapping & Classification • Development of detailed soil maps (1:5K) • Laboratory analysis • Identification of the soil monitoring sites • Establishment/Strengthening the National Soil Archive Facility <p>Development of the Digital National Soil Profile Database</p> <ul style="list-style-type: none"> • Development of national harmonized soil profile database • Production of soil property and threat maps <p>System and Service Development</p> <ul style="list-style-type: none"> • Development of data sharing & use policy • Development of soil-land spatial data infrastructure (SDI) and National Soil & Land Information System • Establishment of national soil monitoring sub-system for selected indicators • Establishment of Dynamic Modelling/Mapping System <p>Improved classification of lands</p> <ul style="list-style-type: none"> • Development of land plans/notes and land classification • Establishment of Decision Support System (DSS) to delineate absolute agricultural lands and alternatives for non-agricultural land use <p>Capacity building activities</p> <ul style="list-style-type: none"> • Awareness campaigns • Dissemination and training efforts 	Country wide
Subcomponent 1.2: MoAF digital blueprint for sectoral information collection and management	<ul style="list-style-type: none"> • Capacity strengthening for collecting timely agricultural data • strengthening the effectiveness of current information systems • development and testing of modelling approaches for monitor crops and yields • provide production forecasts for food price monitoring, food security assessments 	N/A
Component 2: Enhancing Animal Health Capacity for Effective Disease Surveillance and Control		
Subcomponent 2.1: Strengthening the capacity of animal health institutes	<ul style="list-style-type: none"> • Upgrading institutes' infrastructure to increase the biosafety label (BSL) of laboratory units • Establishment of a common laboratory information management system for the targeted institutes • Capacity building 	Adana, Elazig, Erzurum, Konya, Samsun, Izmir, Istanbul and Ankara
Subcomponent 2.2: Strengthening and improving veterinary medical product control	<ul style="list-style-type: none"> • Establishment of a centralized Veterinary Medical Control Center <ul style="list-style-type: none"> ○ test, analyses and administrative facilities ○ national vaccine strain collection bank ○ experimental animal units 	Unknown
Component 3: Investments for Enhanced Productivity, Resource-Efficiency, and Climate Resilience		
Subcomponent 3.1: Strengthening climate resilience, productivity, and	<p>a) Modernization of small-scale greenhouse production</p> <ul style="list-style-type: none"> • Improvement of existing traditional greenhouse infrastructure • Capacity building 	Adana, Antalya, Aydin and in other sub-regions to be determined.

Subcomponent		Activity	Location
resource-use efficiency in vegetable value chains	b) Pilot model for clustering greenhouse production around an efficient energy source (geothermal energy)	<ul style="list-style-type: none"> • Zone planning • Geological surveys • Basic enabling structure <ul style="list-style-type: none"> ○ Geothermal drilling ○ Energy transmission line and network backup power line ○ Potable and utility water ○ Foundation drainage connection line • Feasibility studies for different investment models 	At least one site to be selected amongst 14 sites
Subcomponent 3.2: Promoting the adoption of CSA technologies / practices across relevant crops	a) Digital CSA technologies	<ul style="list-style-type: none"> • DSSs for agriculture production that integrate remote sensing technologies with cloud computing and IoT devices (sensors, field stations) • Variable-rate technology to apply agricultural inputs • Digitally assisted steering systems to optimize field operations • Harvesting losses • Capacity building 	Country wide
	b) Solar energy as an alternative power source for pump irrigation systems	<ul style="list-style-type: none"> • Establishment of solar energy systems • Adoption of digital tools • Capacity building 	Konya, Afyonkarahisar, Mersin, Burdur, Eskişehir, Manisa and Amasya
Subcomponent 3.3: Enhancing the productivity and greening profile of cattle production in Turkey	a) Piloting of a Precision Livestock Farming (PLF) program	<ul style="list-style-type: none"> • Support the uptake of PLF • Strengthening of the associated services for the adoption of PLF • Capacity building 	Country Wide
	b) Reducing cattle production pressures on water pollution and GHG emissions	<ul style="list-style-type: none"> • Establishment of an information network • Supporting the piloting/testing of innovative emerging technologies • Enhancing capacities of professionals to support manure management plans/monitoring • Piloting incentives/approaches for sustainable manure management • Capacity building 	Küçük Menderes sub-basin
Subcomponent 3.4: Research and innovations to support CSA		<ul style="list-style-type: none"> • Research, validation and dissemination efforts around Integrated Pest Management systems • Expanding the use of biofertilizers • Undertaking other climate-related dissemination activities around energy-saving technologies produced by TAGEM • Carrying out climate assessments. • RD&I agenda on irrigation and drainage, aimed at optimizing water use and reduce pollution. 	None (izmir?)
Component 4: Project Management, Monitoring, and Evaluation			
Component 4: Project Management, Monitoring, and Evaluation		<ul style="list-style-type: none"> • Strengthening capacity for day-to-day project management of technical, fiduciary, Monitoring and Evaluation (M&E), E&S issues; • E&S risk management, including preparation of site-specific E&S instruments required; • grievance redress, citizen engagement, and communications; and • M&E of project activities, including impact assessments, beneficiary satisfaction surveys, and development of an integrated system for project management and monitoring of project outputs and outcomes. 	N/A

6.2. Occupational Health and Safety Risks

Occupational health and safety (OHS) risks will vary from low to high depending on the nature of the work to be carried out. Key labor risks associated with OHS risks are listed below:

- OHS risks at construction/decommissioning phases:
 - Accidents and Injuries
 - Over-exertion (Includes ergonomic injuries from repetitive movements and handling, as well as overexertion)
 - Slips and Falls
 - Falls from high places

- Accidents caused by tools used during construction
 - Accidents caused by vehicles on the construction site
 - Traffic accidents that occur during work on the road
- Exposure to dust
- Exposure to noise
- Accidents caused by confined spaces and excavations (where entry or exit is difficult, such as silos, boats, hoppers, utility boxes, tanks, drains, pipes and access shafts)
- Other hazards (injuries from exposure to chemicals, hazardous or flammable substances, and liquid, solid or gaseous wastes)
- Emergency situations (fire, chemical spill, etc.)
- OHS risks at implementation phases
 - Component 2: Enhancing Animal Health Capacity for Effective Disease Surveillance and Control
 - Burns due to steam or direct contact with hot surfaces and heat exhaust
 - Exposure to and inhalation of chemicals
 - Fire and Explosions
 - Exposure to pathogens
 - Exposure to radiological materials
 - Exposure to high level of noise generated by utilities
 - For Subcomponent 3.1a: Modernization of small-scale greenhouse production
 - Physical hazards
 - Operational and workplace hazards including (i) slips, trips, and falls (ii) ergonomics hazards; (iii) sharp and moving objects; and (iv) over-exposure to noise, vibration, and extreme or adverse weather conditions.
 - Accidents due to usage of machines and vehicles in the farm, including worker transportation.
 - Confined and restricted space entry
 - Exposure to organic dust
 - Risk of fire and explosion from combustible dust
 - Biological hazards through contacting with venomous animals
 - Chemical hazards through exposure to hazardous products, including pesticides and herbicides
 - For Subcomponent 3.1b: Pilot model for clustering greenhouse production around an efficient energy source (geothermal energy)
 - Geothermal drilling
 - Exposure to geothermal gases, mainly to hydrogen sulfide
 - Accidents caused by confined spaces
 - Burns due to exposure to steam or direct contact with hot surfaces as well as blowout accidents
 - Exposure to high level of noise generated by well drilling, steam flashing, venting, pumping facilities, turbines, and temporary pipe flushing activities.
 - Energy transmission line and network backup power line
 - Live power lines
 - Working at height on poles and structures
 - Exposure to Electric and Magnetic Fields
 - Exposure to chemicals (pesticides, PCBs).
 - Community Health and Safety
 - For Subcomponent 3.3b: Reducing cattle production pressures on water pollution and GHG emissions
 - Exposure to physical hazards
 - Exposure to chemical hazards
 - Exposure to biological agents

- Confined spaces

In general, excessive overtime working hours is a potential labor risk in the construction sector in Turkey. There is a potential risk that due to project limited time period and seasonal restrictions of construction works, contracted workers may perform overtime time hours above the annual limit set by the Labor Law.

The sub-projects do not expect to have labor influx risks as majority of the workforce will be hired locally. Majority of the workforce will be Turkish. However, if other labor risks arise during project implementation, PIU will develop procedures to prevent further impacts.

6.3. COVID-19

COVID-19 Outbreak Management and Study Guide published by the Ministry of Health and Circular dated 20.03.2020 and numbered 2020/9 issued by the General Directorate of Construction Affairs of the Ministry of Environment, Urbanization and Climate Change will be applied during the implementation of subprojects.

Each working site has its own different characteristics such as geographical situation, accommodation and work done. Throughout implementation of the Project detailed risk identification will be executed in order to develop effective mitigation measures. The Contractors will be responsible for identification of risks and will inform the workers about these risks and relevant mitigation measures to be taken. The purpose of the measures to be taken at the construction sites within the scope of COVID-19 is to prevent the occurrence of cases, but to prevent the development of epidemics even if there are cases. During the project implementation COVID-19 risk can be considered as high.

6.4. Sexual Harassment, Abuse, and Gender-Based Violence

Abuse and gender-based violence under national legislation are prohibited however and there are legal sanctions on these issues. Based on a workforce that will be hired largely locally, significant labor influx is not foreseen and the risk for sexual exploitation and abuse/sexual harassment (SEA/SH) is assessed as low. During implementation period the contractors and workers will be required to follow the Code of Conduct included in the **Annex 4** of this LMP and adhere to the principles below.

During the all project phases the following principles will be adopted and applied. These are:

- Principle 1: Foster a culture of respect and high standards of ethical behavior across institutions.
- Principle 2: Establish and maintain standards aimed at preventing sexual harassment, abuse, and exploitation and other forms of misconduct.
- Principle 3: Provide a safe and trusted environment for those affected by sexual harassment, abuse, and exploitation to step forward to report incidents and concerns, with the assurance that they will be treated respectfully and consistently.
- Principle 4: Provide protection for those affected, as well as whistle-blowers and/or witnesses within their institutions, and to take appropriate measures against any form of retaliation.
- Principle 5: Maintain robust policy frameworks and clear institutional mechanisms that address how incidents and allegations will be handled should they arise.
- Principle 6: Provide effective training programs so all staff understand the requirements and standards of behavior expected of them as international civil servants.
- Principle 7: Support clients to develop and implement policies and mechanisms that address sexual harassment, abuse, and exploitation.

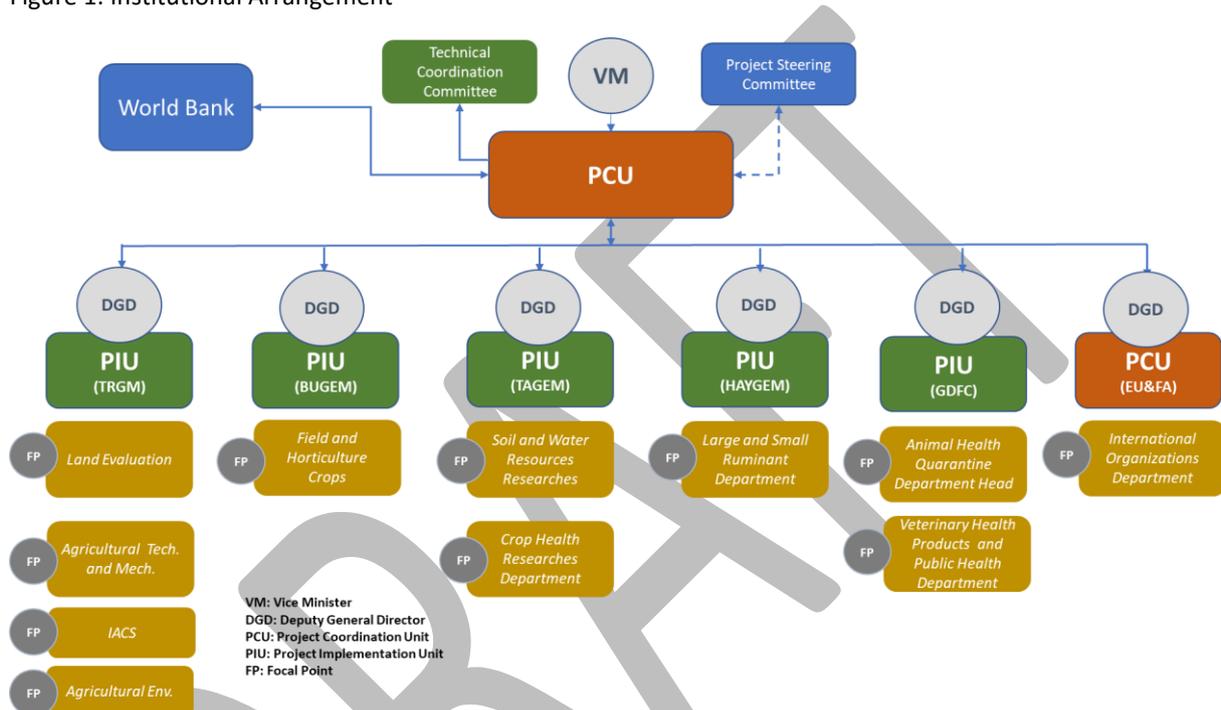
Mandatory trainings will be given on codes of ethics/conduct and harassment and misconduct issues for workers.

7. Responsible Staff

The overall responsibility for project implementing, including management and coordination will lie with the Ministry of Agriculture and Forestry (MoAF), through the Implementing Units. These are the General Directorate of Agricultural Reform (TRGM) (Subcomponents 1.1., 3.2 and 3.3b), DGIT (Subcomponent 1.2), BUGEM (General Directorate of Plant Production) (Subcomponent 3.1), HAYGEM (Subcomponent 3.3a), the General Directorate of Food and Control (DGFC) (Component 2), the General Directorate of Agricultural Research and Policies (TAGEM) (Subcomponent 3.4) and the General Directorate of EU and Foreign Relations (ABDGM) (Component 4). Project implementation structure is given in Figure 1.

General institutional arrangement of the Project is given in Figure 1.

Figure 1: Institutional Arrangement



The implementation structures and their overall responsibilities within the Project are:

- **Project Steering Committee (PSC)** will ensure effective coordination at a higher level and provide strategic advice. The PSC will have participation of senior leadership of the General Directorates (GDs) leading implementation of the subcomponents, including Deputy General Directors from the relevant GDs (TRGM, BUGEM, HAYGEM, DGFC, TAGEM, DGIT and ABDGM), as well as representatives of the Strategy and Budget Office of the Presidency (SBO) and the Ministry of Treasury and Finance (MoTF).
- **Project Coordinating Unit (PCU)** will be responsible for overall project coordination. The location of the PCU will be at the GD of EU and Foreign Relations (ABDGM). PCU's functions will be overseen by the leading Vice-Minister.
- **Project implementation Units (PIUs)** will be established under each leading GD responsible for specific subcomponents; TRGM for subcomponents 1.1., 3.2 and 3.3b, DGIT for subcomponent 1.2, DGFC for component 2, BUGEM for subcomponent 3.1, HAYGEM for subcomponent 3.3a, and TAGEM for subcomponent 3.4. If more than one department under the relevant GD is responsible for the implementation of project subcomponents, focal points will be appointed in each department (Figure 1), these focal points will report directly to the Deputy General Director and will coordinate implementation closely with the PIU coordinator.
- **Regional Units (RUs).** Activities under each subcomponent will be implemented in close coordination with Provincial Directorates (PD) (for subcomponents 1.1, 3.1 3.2 and 3.3), Field Officers (FO) or Research Institutes/Regional Laboratories (for TAGEM-Subcomponent 3.4 and DGFC-Component 2 activities) linked to the respective General Directorates at MoAF headquarters.

The responsible staff for the LMP and their respective duties are described in the following paragraphs.

Project Coordinating Unit (PCU): PCU is responsible from the overall project coordination. They will hire social staff for monitoring of LMPs. PCU will

- oversee overall implementation of LMPs to ensure regular project reporting and evaluation,
- ,
- ensure proper implementation of the LMP,
- support focal points of PIUs about LMPs,
- inform World Bank in instances of work accidents, and
- prepare all LMP related documents to be submitted to the Bank.

Project Implementation Units (PIU): They are responsible for the implementation of the subcomponents. Focal point of PIU will

- oversee LMP activities under their respective sub-components,
- ensure that contractors prepare Contractor's LM Plan (LM Plan) is in line with this LMP and Contractor's ESMP before commencing the work,
- monitor implementation of the LM Plans,
- establish an OHS steering committee with MOAF's units, representatives of employees, contractors and all sub-contractors to discuss preventive measures, deviations and non-compliances, accidents and corrective actions,
- inform PCU in instances of work accidents, and
- prepare reports about LMP activities under its respective sub-components and submit to PCU.

The Supervision Consultant(s) will be hired by PIUs. S/He will

- conduct periodic supervision of the implementation of the LMP including contractors' labor conditions and OHS performance
- prepare reports on the implementation of the LMP including contractors' labor conditions and OHS performance to be submitted to PIU

Contractor will;

- prepare Contractor's LMP and send to PIU for approval.
- supervise subcontractors' LMPs, put together and send to PIU for approval.
- hire labor and occupational safety experts familiar with the WB standards.
- prepare an OHS accountability matrix for all staff including project manager, contract manager, OHS staff, foremen, and all employees with clear roles and OHS responsibilities.
- provide PPEs and other preventive measure for employees at no cost.
- conduct internal OHS surveys and audits to ensure that all work-related regulations are applied strictly. Non-compliances, corrective actions and follow ups will be documented in the monthly progress reports that will send to PIUs.
- report all illnesses and accidents that cause more than one-day job loss.
- inform PIU about any inspections and audits carried out by the Ministry of Labor and Social Security. The findings of the labor audits will be presented to PIU and the World Bank, if requested.

8. Policies and Procedures

This section outlines the main policies and procedures to be followed by contractors of the project. It will be updated and amended as needed, after the contracts have been awarded.

All labor to be used in site works will comprise of contracted workers. No community workers will be engaged in the scope of the Project. All contracted workers' rights will be protected by employment contracts in accordance with the Labor Law (No. 4857) and contractors and subcontractors will make sure that all workers are registered in the SSI.

8.1. Terms and Conditions of Employment

As specified in Labor Code of Turkey and ESS2 of the World Bank Environmental Social Framework, the employment of the workers will be based on the principles of non-discrimination and equal opportunity. There will be no discrimination with respect to any aspects of the employment relationship, such as recruitment, compensation, working conditions and terms of employment, access to training, promotion or termination of employment.. The following measures will be developed by the contractors the terms and conditions that will be applied by the contractors and the subcontractors are defined below;

- As per Labor Code requirements, recruitment procedures will be transparent public and non-discriminatory with respect to ethnicity, religion, sexual orientation, disability, gender, and other grounds included in the Labor Code.
- • Applications for employment will be considered in accordance with the application procedures established by the project contractors, including sub-contractors
- Clear job descriptions will be provided in advance of recruitment and will explain the skills required for each post.
- All workers will have written contracts describing terms and conditions of work and will have the contents explained to them. Workers will sign the employment contract. Terms and conditions of employment will be available at work sites;
- Unskilled labor will be preferentially recruited from the affected communities, settlements and municipalities;
- Employees will be informed at least one month before their expected release date of the coming termination. According to Turkish Labor Law numbered 4857 for all dismissals including collective redundancy in line with Article 29 of the Law;
- The contracted workers will not pay any hiring fees. If any hiring fees are to be incurred, these will be paid by the Employer ('Contractors');
- Depending on origin of the employer and employee the contracts will be developed in corresponding language understandable for both parties;
- In addition to written documentation, an oral explanation of conditions and terms of employment will be provided to workers who may have difficulties with understanding the documentation;
- While communication language related problems are not expected, attention should be given to ensuring coordination between different sub-contractors and means to address any language differences; and
- Foreign workers, migrants, will require residence permit, which will allow them to work in Turkey.
- All of the contracts of all project contractors (and sub-contractor) will indicate that the personnel must be of the age of 18 years or more.
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8.2. Code of Conduct

The contractors will adopt and implement the Code of Conduct (CoC), which will be included in the World Bank Standard Bidding Documents. The Code of Conduct will also include measures to address SEA/SH issues. It will reflect the company's mission, core values and overall working culture. The content of the Code of Conduct is included in the World Bank Standard Bidding Documents.

Contracts with contractors shall contain a provision on the obligation to comply with the current Labor and OHS Law and with this LMP. After contractors are hired for infrastructure projects, contractors will prepare

Labor Management Plans for their activities in compliance with this Labor Management Procedures. This will be reviewed and cleared by MoAF before any civil works begin. The Contractor Labor Management Plans will include the Code of Conduct included in the **Annex-XX** of this Procedure. The Contractor is responsible for raising awareness on and training all workers on the principles in the procedures and the code of conduct and the grievance mechanism. In case the contractors engage subcontractors, contractors shall be under obligation to build in such a provision in the sub-contracts.

Contractors will need to maintain good relations with local communities through a adhering to the Code of Conduct (CoC). The CoC commits all persons engaged by the contractor, including sub-contractors and suppliers, to acceptable standards of behavior. The CoC must include sanctions for non-compliance, including non-compliance with specific policies related to gender-based violence, sexual exploitation and sexual harassment (e.g., termination). The CoC should be written in plain language and signed by each worker to indicate that they have:

- received a copy of the CoC as part of their contract;
- had the CoC explained to them as part of induction process;
- acknowledged that adherence to this CoC is a mandatory condition of employment; and
- understood that violations of the CoC can result in serious consequences, up to and including dismissal, or referral to legal authorities.

A copy of the CoC shall be displayed in a location easily accessible to the community and project affected people.

Contractors must address the risk of gender-based violence, through:

- Mandatory training and awareness raising for the workforce about refraining from unacceptable conduct toward local community members, specifically women. Training may be repeated;
- Informing workers about national laws that make sexual harassment and gender-based violence a punishable offence which is prosecuted;
- Adopting a policy to cooperate with law enforcement agencies in investigating complaints about gender-based violence;
- Developing a system to capture gender-based violence, sexual exploitation and workplace sexual harassment related complaints/issues.

8.3. Age of Employment

Turkish law prohibits anyone under 18 from performing hazardous work, and construction is considered hazardous. Thus, no construction workers under the age of 18 years will be employed. As MoAF is a governmental ministry no one under the legal age (18 years) is permitted to work within the institution. Therefore, child labor risks are not expected in relation to the project.

The project contractors will be required to verify the age of all workers. This will require workers to provide official documentation, which could include a birth certificate, national identification card, passport, or driver licenses.

If a child under the minimum age (18 years) is discovered working on the project, measures will be taken to immediately terminate the employment or engagement of the child in a responsible manner, considering the best interest of the child.

9. Occupational Health and Safety

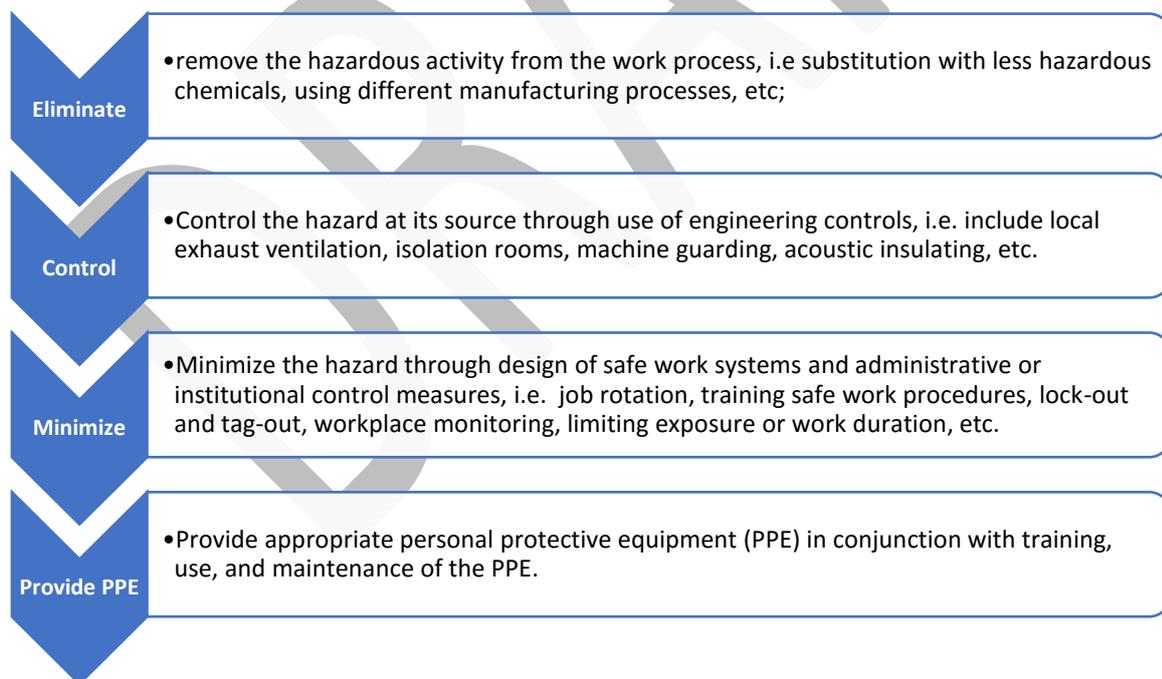
- Pursuant to the relevant provision of the national labor code, ESS2, and World Bank Standard procurement document, all contractors and sub-contractors shall manage the construction site in such a way that the workers and communities are properly protected against possible OHS risks. The following OHS standard requirements should as a minimum be included in the OHS Plan to be prepared by the contractors: Risk Assessment Procedure based on Occupational Health and Safety Risk Assessment Regulation (29.12.2012/28512)
- Emergency response procedure based on Regulation on Emergencies in Workplaces (18.06.2013/28681)
- OHS training based on Regulation on Procedures and Principles of Employee’s Occupational Health and Safety Training (15.05.2013/28648)
- General Facility Design and Operation based on Occupational Health and Safety Regulation in Construction Works (05.10.2013/28786)
- Right to abstain from work based on Article 13 “Right to abstain from work” of Law no. 6331.
- OHS accountability matrix for all staff including project manager, contract manager, OHS staff, foremen, and all employees with clear roles and OHS responsibilities
- Other documents related to the characteristics of the work according to national regulations.

The documentation will be based on the following principles as stated in Environmental, Health, and Safety General Guidelines.

9.1. Priority order of Introduction of Preventive and Protective Measures

The OHS plan will include the preventive and protective measures that will be introduced according to the order of priority shown in Figure 2:

Figure 2: Priority order of introduction of preventive and protective measures



9.2. Risk Ranking

In risk assessment analyzes, worker scenarios will be prepared in line with Table 5. The results of these analyses should be prioritized as part of an action plan based on the likelihood and severity of the consequence of exposure to the identified hazards.

Table 5: Risk ranking table to classify worker scenarios

	Consequences				
Likelihood	Insignificant	Minor	Moderate	Major	Catastrophic
Almost certain	L	M	E	E	E
Likely	L	M	H	E	E
Moderate	L	M	H	E	E
Unlikely	L	L	M	H	E
Rare	L	L	M	H	H

E: extreme risk; immediate action required

H: high risk; senior management attention needed

M: moderate risk; management responsibility should be specified

L: low risk; manage by routine procedures

9.3. Additional Measures for General Facility Design and Operation

Minimum occupational health and safety conditions in construction works are determined by the Regulation on Occupational Health and Safety in Construction Works (05.10.2013/28786). The following conditions should be complied in addition to the obligations stated in the Regulation and other OHS regulations as stated in Environmental, Health, and Safety General Guidelines;

- Integrity of Workplace Structures
 - Buildings should be structurally safe, provide appropriate protection against the climate, and have acceptable light and noise conditions.
 - Fire resistant, noise-absorbing materials should, to the extent feasible, be used for cladding on ceilings and walls.
- Severe Weather and Facility Shutdown
 - Workplace structures should be designed and constructed to withstand the expected elements for the region and have an area designated for safe refuge, if appropriate.
- Lavatories and Showers
 - Toilet facilities indicating whether it is “In Use” or “Vacant” and adequate supplies of hot and cold running water should also be provided.
- Potable Water Supply
 - Adequate supplies of potable drinking water should be provided from a fountain with an upward jet or with a sanitary means of collecting the water for the purposes of drinking
 - Water supplied to areas of food preparation or for the purpose of personal hygiene (washing or bathing) should meet drinking water quality standards
- Lighting
 - Emergency lighting of adequate intensity should be installed and automatically activated upon failure of the principal artificial light source to ensure safe shut-down, evacuation, etc.
- Safe Access
 - Hand, knee and foot railings should be installed on stairs, fixed ladders, platforms, permanent and interim floor openings, loading bays, ramps, etc.
- Air Supply
 - Re-circulation of contaminated air is not acceptable. Air inlet filters should be kept clean and free of dust and microorganisms. Heating, ventilation and air conditioning (HVAC) and industrial evaporative cooling systems should be equipped, maintained and operated so as to prevent growth and spreading of disease agents (e.g. Legionella pneumophila) or breeding of vectors (e.g. mosquitoes and flies) of public health concern.

9.4. Incident Reporting

According to Article 14 “Registration and notification of work accidents and occupational diseases” of Law no. 6331, the employer reports the occupational accidents to the Social Security Institution within three workdays after the accident, and the occupational diseases reported to her/him by the health service providers or the workplace doctor, within three workdays from the date of learning. In line with this article, the contractor will inform the relevant PIU immediately after OHS related incidents and the PIU will inform PCU and PCU will

inform the World Bank about the incident in 3 (three) working days and will send an incident investigation report together with the corrective action plan in 30 business days to the World Bank.

All reported occupational accidents, occupational diseases, dangerous occurrences, and incidents together with near misses should be investigated with the assistance of an expert in occupational health and safety through a root cause analysis. The analysis should include:

- description of the accident/disease,
- causes of the accident or illness,
- measures necessary to prevent recurrences.

The contractor will submit this root cause analysis to PIU in 30 calendar days after the accident happened or the disease is diagnosed. Afterwards, PIU will submit the incident report to PCU in no more than 2 days, and PCU will submit incident report to the World Bank within 35 calendar days of the event.

The contractor will also include the summary of accidents and diseases in its monthly reports throughout the Project according to the codes indicated in Table 6.

Table 6: Classification system for accidents and diseases

	Code	Explanation
Fatalities (number)	A2	Fatalities occurred within a month of the report submission
	A3	Fatalities occurred within a year of the report submission
Non-fatal injuries (number)	B1	Number of non-fatal injuries that caused loss of work for less than one day in the reporting period.
	B2	Number of non-fatal injuries that caused loss of work for up to three days in the reporting period.
	B3	Number of non-fatal injuries that caused loss of work for more than three days in the reporting period.
Total time lost non-fatal injuries (days)	C1	Total time lost in non-fatal injuries that caused loss of work for up to three days in the reporting period.
	C2	Total time lost in non-fatal injuries that caused loss of work for more than three days in the reporting period.

In cases when significant adverse effects happened or likely to happen on the environment, affected communities, and public which might include strikes or other labor protests, project-caused injuries to community members or property damage, the contractor will inform the relevant PIU immediately after OHS related incidents and the PIU will inform PCU and PCU will inform the World Bank about the incident in 3 (three) working days and will send an incident investigation report together with the corrective action plan in 30 business days to the World Bank

9.5. COVID-19 Considerations

The Contractor should identify measures to address the COVID-19 situation. What will be possible will depend on the context of the project: the location, existing project resources, availability of supplies, capacity of local emergency/health services, the extent to which the virus already exist in the area. A systematic approach to planning, recognizing the challenges associated with rapidly changing circumstances, will help the project put in place the best measures possible to address the situation. PIUs and contractors should refer to guidance issued by relevant authorities, both national and international (e.g. WHO), which is regularly updated.

Addressing COVID-19 at a project site goes beyond occupational health and safety, and is a broader project issue which will require the involvement of different members of a project management team. In many cases, the most effective approach will be to establish procedures to address the issues, and then to ensure that these procedures are implemented systematically. Where appropriate given the project context, a designated team should be established to address COVID-19 issues, including PIU representatives, the Supervising Engineer, management (e.g. the project manager) of the contractor and sub-contractors, security, and medical and OHS professionals. Procedures should be clear and straightforward, improved as necessary, and supervised

and monitored by the COVID-19 focal point(s). Procedures should be documented, distributed to all contractors, and discussed at regular meetings to facilitate adaptive management. The issues set out below include a number that represent expected good workplace management but are especially pertinent in preparing the project response to COVID-19.

(a) Assessing Workforce Characteristics

- The Contractor should prepare a detailed profile of the project work force, key work activities, schedule for carrying out such activities, different durations of contract and rotations (e.g. 4 weeks on, 4 weeks off).
- This should include a breakdown of workers who reside at home (i.e. workers from the community), workers who lodge within the local community and workers in on-site accommodation. Where possible, it should also identify workers that may be more at risk from COVID-19, those with underlying health issues or who may be otherwise at risk.
- Consideration should be given to ways in which to minimize movement in and out of site. This could include lengthening the term of existing contracts, to avoid workers returning home to affected areas, or returning to site from affected areas.
- Workers accommodated on site should be required to minimize contact with people near the site, and in certain cases be prohibited from leaving the site for the duration of their contract, so that contact with local communities is avoided.
- Consideration should be given to requiring workers lodging in the local community to move to site accommodation (subject to availability) where they would be subject to the same restrictions.
- Workers from local communities, who return home daily, weekly or monthly, will be more difficult to manage. They should be subject to health checks at entry to the site (as set out above) and at some point, circumstances may make it necessary to require them to either use accommodation on site or not to come to work.

(b) Entry/Exit to the Work Site and Checks on Commencement of Work

Entry/exit to the work site should be controlled and documented for both workers and other parties, including support staff and suppliers. Possible measures may include:

- Establishing a system for controlling entry/exit to the site, securing the boundaries of the site, and establishing designating entry/exit points (if they do not already exist). Entry/exit to the site should be documented.
- Training security staff on the (enhanced) system that has been put in place for securing the site and controlling entry and exit, the behaviors required of them in enforcing such system and any COVID -19 specific considerations.
- Training staff who will be monitoring entry to the site, providing them with the resources they need to document entry of workers, conducting temperature checks and recording details of any worker that is denied entry.
- Confirming that workers are fit for work before they enter the site or start work. While procedures should already be in place for this, special attention should be paid to workers with underlying health issues or who may be otherwise at risk. Consideration should be given to demobilization of staff with underlying health issues.
- Checking and recording temperatures of workers and other people entering the site or requiring self-reporting prior to or on entering the site.
- Providing daily briefings to workers prior to commencing work, focusing on COVID-19 specific considerations including cough etiquette, hand hygiene and distancing measures, using demonstrations and participatory methods.
- During the daily briefings, reminding workers to self-monitor for possible symptoms (fever, cough) and to report to their supervisor or the COVID-19 focal point if they have symptoms or are feeling unwell.
- Preventing a worker from an affected area or who has been in contact with an infected person from returning to the site for 14 days or (if that is not possible) isolating such worker for 14 days.

- Preventing a sick worker from entering the site, referring them to local health facilities if necessary or requiring them to isolate at home for 14 days.

(c) General Hygiene

Requirements on general hygiene should be communicated and monitored, to include:

- Training workers and staff on site on the signs and symptoms of COVID-19, how it is spread, how to protect themselves (including regular handwashing and social distancing) and what to do if they or other people have symptoms (for further information see WHO COVID-19 advice for the public).
- Placing posters and signs around the site, with images and text in local languages.
- Ensuring handwashing facilities supplied with soap, disposable paper towels and closed waste bins exist at key places throughout site, including at entrances/exits to work areas; where there is a toilet, canteen or food distribution, or provision of drinking water; in worker accommodation; at waste stations; at stores; and in common spaces. Where handwashing facilities do not exist or are not adequate, arrangements should be made to set them up. Alcohol based sanitizer (if available, 60-95% alcohol) can also be used.
- Review worker accommodations, and assess them in light of the requirements set out in IFC/EBRD guidance on Workers' Accommodation: processes and standards, which provides valuable guidance as to good practice for accommodation.
- Setting aside part of worker accommodation for precautionary self-quarantine as well as more formal isolation of staff who may be infected (see paragraph (f)).

(d) Cleaning and Waste Disposal

Conduct regular and thorough cleaning of all site facilities, including offices, accommodation, canteens, common spaces. Review cleaning protocols for key construction equipment (particularly if it is being operated by different workers). This should include:

- Providing cleaning staff with adequate cleaning equipment, materials and disinfectant.
- Review general cleaning systems, training cleaning staff on appropriate cleaning procedures and appropriate frequency in high use or high-risk areas.
- Where it is anticipated that cleaners will be required to clean areas that have been or are suspected to have been contaminated with COVID-19, providing them with appropriate PPE: gowns or aprons, gloves, eye protection (masks, goggles or face screens) and boots or closed work shoes. If appropriate PPE is not available, cleaners should be provided with best available alternatives.
- Training cleaners in proper hygiene (including handwashing) prior to, during and after conducting cleaning activities; how to safely use PPE (where required); in waste control (including for used PPE and cleaning materials).
- Any medical waste produced during the care of ill workers should be collected safely in designated containers or bags and treated and disposed of following relevant requirements (e.g., national, WHO). If open burning and incineration of medical wastes is necessary, this should be for as limited a duration as possible. Waste should be reduced and segregated, so that only the smallest amount of waste is incinerated (for further information see WHO interim guidance on water, sanitation and waste management for COVID-19).

(e) Adjusting Work Practices

Consider changes to work processes and timings to reduce or minimize contact between workers, recognizing that this is likely to impact the project schedule. Such measures could include:

- Decreasing the size of work teams.
- Limiting the number of workers on site at any one time.
- Changing to a 24-hour work rotation.
- Adapting or redesigning work processes for specific work activities and tasks to enable social distancing, and training workers on these processes.

- Continuing with the usual safety trainings, adding COVID-19 specific considerations. Training should include proper use of normal PPE. While as of the date of this note, general advice is that construction workers do not require COVID-19 specific PPE, this should be kept under review (for further information see WHO interim guidance on rational use of personal protective equipment (PPE) for COVID-19).
- Reviewing work methods to reduce use of construction PPE, in case supplies become scarce or the PPE is needed for medical workers or cleaners. This could include, e.g. trying to reduce the need for dust masks by checking that water sprinkling systems are in good working order and are maintained or reducing the speed limit for haul trucks.
- Arranging (where possible) for work breaks to be taken in outdoor areas within the site.
- Consider changing canteen layouts and phasing meal times to allow for social distancing and phasing access to and/or temporarily restricting access to leisure facilities that may exist on site, including gyms.
- At some point, it may be necessary to review the overall project schedule, to assess the extent to which it needs to be adjusted (or work stopped completely) to reflect prudent work practices, potential exposure of both workers and the community and availability of supplies, taking into account Government advice and instructions.

(f) Local Medical and Other Services

Given the limited scope of project medical services, the project may need to refer sick workers to local medical services. Preparation for this includes:

- Obtaining information as to the resources and capacity of local medical services (e.g. number of beds, availability of trained staff and essential supplies).
- Conducting preliminary discussions with specific medical facilities, to agree what should be done in the event of ill workers needing to be referred.
- Considering ways in which the project may be able to support local medical services in preparing for members of the community becoming ill, recognizing that the elderly or those with pre-existing medical conditions require additional support to access appropriate treatment if they become ill.
- Clarifying the way in which an ill worker will be transported to the medical facility, and checking availability of such transportation.
- Establishing an agreed protocol for communications with local emergency/medical services.
- Agreeing with the local medical services/specific medical facilities the scope of services to be provided, the procedure for in-take of patients and (where relevant) any costs or payments that may be involved.
- Develop procedure for the measures to be taken if a worker infected with COVID-19 dies.

. While normal project procedures will continue to apply, COVID-19 may raise other issues because of the infectious nature of the disease. The project should liaise with the relevant local authorities to coordinate what should be done, including any reporting or other requirements under national law.

(g) Instances or Spread of the Virus

WHO provides detailed advice on what should be done to treat a person who becomes sick or displays symptoms that could be associated with the COVID-19 virus (for further information see WHO interim guidance on infection prevention and control during health care when novel coronavirus (nCoV) infection is suspected). The project should set out risk-based procedures to be followed, with differentiated approaches based on case severity (mild, moderate, severe, critical) and risk factors (such as age, hypertension, diabetes) (for further information see WHO interim guidance on operational considerations for case management of COVID-19 in health facility and community). These may include the following:

- If a worker has symptoms of COVID-19 (e.g. fever, dry cough, fatigue) the worker should be removed immediately from work activities and isolated on site.

- If testing is available on site, the worker should be tested on site. If a test is not available at site, the worker should be transported to the local health facilities to be tested (if testing is available).
- If the test is positive for COVID-19 or no testing is available, the worker should continue to be isolated. This will either be at the work site or at home. If at home, the worker should be transported to their home in transportation provided by the project.
- Extensive cleaning procedures with high-alcohol content disinfectant should be undertaken in the area where the worker was present, prior to any further work being undertaken in that area. Tools used by the worker should be cleaned using disinfectant and PPE disposed of.
- Co-workers (i.e. workers with whom the sick worker was in close contact) should be required to stop work, and be required to quarantine themselves for 14 days, even if they have no symptoms.
- Family and other close contacts of the worker should be required to quarantine themselves for 14 days, even if they have no symptoms.
- If a case of COVID-19 is confirmed in a worker on the site, visitors should be restricted from entering the site and worker groups should be isolated from each other as much as possible.
- If workers live at home and has a family member who has a confirmed or suspected case of COVID-19, the worker should quarantine themselves and not be allowed on the project site for 14 days, even if they have no symptoms.
- Workers should continue to be paid throughout periods of illness, isolation or quarantine, or if they are required to stop work, in accordance with national law.
- Medical care (whether on site or in a local hospital or clinic) required by a worker should be paid for by the employer.

(h) Continuity of Supplies and Project Activities

Where COVID-19 occurs, either in the project site or the community, access to the project site may be restricted, and movement of supplies may be affected.

- Identify back-up individuals, in case key people within the project management team (PIU, Supervising Engineer, Contractor, sub-contractors) become ill, and communicate who these are so that people are aware of the arrangements that have been put in place.
- Document procedures, so that people know what they are, and are not reliant on one person's knowledge.
- Understand the supply chain for necessary supplies of energy, water, food, medical supplies and cleaning equipment, consider how it could be impacted, and what alternatives are available. Early proactive review of international, regional and national supply chains, especially for those supplies that are critical for the project, is important (e.g. fuel, food, medical, cleaning and other essential supplies). Planning for a 1-2 month interruption of critical goods may be appropriate for projects in more remote areas.
- Place orders for/procure critical supplies. If not available, consider alternatives (where feasible).
- Consider existing security arrangements, and whether these will be adequate in the event of interruption to normal project operations.
- Consider at what point it may become necessary for the project to significantly reduce activities or to stop work completely, and what should be done to prepare for this, and to re-start work when it becomes possible or feasible.

(i) Training and Communication with Workers

Workers need to be provided with regular opportunities to understand their situation, and how they can best protect themselves, their families and the community. They should be made aware of the procedures that have been put in place by the project, and their own responsibilities in implementing them.

- It is important to be aware that in communities close to the site and amongst workers without access to project management, social media is likely to be a major source of information. This raises the importance of regular information and engagement with workers (e.g. through training, town halls,

tool boxes) that emphasizes what management is doing to deal with the risks of COVID-19. Allaying fear is an important aspect of work force peace of mind and business continuity. Workers should be given an opportunity to ask questions, express their concerns, and make suggestions.

- Training of workers should be conducted regularly, as discussed in the sections above, providing workers with a clear understanding of how they are expected to behave and carry out their work duties.
- Training should address issues of discrimination or prejudice if a worker becomes ill and provide an understanding of the trajectory of the virus, where workers return to work.
- Training should cover all issues that would normally be required on the work site, including use of safety procedures, use of construction PPE, occupational health and safety issues, and code of conduct, taking into account that work practices may have been adjusted.
- Communications should be clear, based on fact and designed to be easily understood by workers, for example by displaying posters on handwashing and social distancing, and what to do if a worker displays symptoms.

(j) Communication and Contact with the Community

- Relations with the community should be carefully managed, with a focus on measures that are being implemented to safeguard both workers and the community. The community may be concerned about the presence of non-local workers, or the risks posed to the community by local workers presence on the project site. The project should set out risk-based procedures to be followed , which may reflect WHO guidance (for further information see WHO Risk Communication and Community Engagement (RCCE) Action Plan Guidance COVID-19 Preparedness and Response). The following good practice should be considered:
- Communications should be clear, regular, based on fact and designed to be easily understood by community members.
- Communications should utilize available means. In most cases, face-to-face meetings with the community or community representatives will not be possible. Other forms of communication should be used; posters, pamphlets, radio, text message, electronic meetings. The means used should take into account the ability of different members of the community to access them, to make sure that communication reaches these groups.
- The community should be made aware of procedures put in place at site to address issues related to COVID-19. This should include all measures being implemented to limit or prohibit contact between workers and the community. These need to be communicated clearly, as some measures will have financial implications for the community (e.g. if workers are paying for lodging or using local facilities). The community should be made aware of the procedure for entry/exit to the site, the training being given to workers and the procedure that will be followed by the project if a worker becomes sick.
- If project representatives, contractors or workers are interacting with the community, they should practice social distancing and follow other COVID-19 guidance issued by relevant authorities, both national and international (e.g. WHO).

9.6. Monitoring of OHS Implementations

As it is stated in the above sections, Turkey has a good national law and regulations about OHS. However, employer and employee culture of OHS, and enforcement and monitoring are weak. Thus, project level LMPs should present a very strong occupational health and safety monitoring program which should include below information as stated in Environmental, Health, and Safety General Guidelines:

- **Safety inspection, testing and calibration:** This should include regular inspection and testing of all safety features and hazard control measures focusing on engineering and personal protective features, work procedures, places of work, installations, equipment, and tools used. The inspection should verify that issued PPE continues to provide adequate protection and is being worn as required. All instruments installed or used for monitoring and recording of working environment parameters should be regularly tested and calibrated, and the respective records maintained.

- **Surveillance of the working environment:** Employers should document compliance using an appropriate combination of portable and stationary sampling and monitoring instruments. Monitoring and analyses should be conducted according to internationally recognized methods and standards. Monitoring methodology, locations, frequencies, and parameters should be established individually for each project following a review of the hazards. Generally, monitoring should be performed during commissioning of facilities or equipment and at the end of the defect and liability period, and otherwise repeated according to the monitoring plan.
- **Surveillance of workers health:** When extraordinary protective measures are required (for example, against biological agents Groups 3 and 4, and/or hazardous compounds), workers should be provided appropriate and relevant health surveillance prior to first exposure, and at regular intervals thereafter. The surveillance should, if deemed necessary, be continued after termination of the employment.
- **Training:** Training activities for employees and visitors should be adequately monitored and documented (curriculum, duration, and participants). Emergency exercises, including fire drills, should be documented adequately. Service providers and contractors should be contractually required to submit to the employer adequate training documentation before start of their assignment.

In addition, to enforce the effective implementation of the plan,

- PIUs will
 - establish an OHS steering committee with representatives of employees, contractors and all sub-contractors. This committee will hold bi-weekly OHS meetings to discuss preventive measures, deviations and non-compliances, accidents and corrective actions.
 - conduct periodic supervision and monitoring activities for contractors' OHS performance, including site visits, **at least monthly, preferably weekly.**
- Supervision Consultant
 - monitor/assess the contractor's activities in compliance with the LMP
 - prepare monthly? Progress report
 - ?
- Contractors and subcontractors will
 - conduct internal OHS surveys and audits to ensure that all work-related regulations are applied strictly. Non-compliances, corrective actions and follow ups will be documented in the monthly progress reports that will be sent to PIUs.
 - inform the PIUs about any inspections and audits carried out by the Ministry of Labor and Social Security. The findings of the labor audits will be presented to PIU and the World Bank, if requested.

10. Grievance Mechanism for Labor Related Complaints

The PIU will require contractors to establish and implement a GM for their workers, including subcontractors prior to commencement of works. The construction contractors will prepare their Labor Management Plans before the start of civil works, which will also include detailed description of the workers grievance mechanisms.

The workers' grievance mechanism will include;

- a procedure to receive grievances such as comment/complaint form, suggestion boxes, email, a telephone hotline;
- stipulated timeframes to respond to grievances and to resolve cases;
- a grievance register monitor table to record and track the timely resolution of grievances; and
- a responsible department to receive, record, address and track resolution of grievances.

The Supervision Consultant will monitor the contractors' recording and resolution of grievances, and report these to the PIU in their monthly progress reports. The process will be monitored by the GM Focal Point, a PIU representative who will be responsible for the project GM.

10.1. Existing GMs

GM at National Level: The general grievance mechanism in Turkey is **CİMER** (Cumhurbaşkanlığı İletişim Merkezi – Presidency Communication Center), which is an electronic public service tool created for the use of the right to petition and the right to information, and to provide resources for policies to be formed by receiving the opinions, complaints and suggestions of citizens about government works, and actions and transactions of the public administration [4]. Citizens of the Republic of Turkey and private law legal entities have right to make application. Foreigners can apply by letter or fax within the framework of reciprocity in accordance with international agreements. The applications can be done via www.cimer.gov.tr, ALO 150, letter-fax, or in person about requests, complaints, denunciations, opinion-suggestions and acquirement of information. It requires identity verification. However, the applicant might prefer to hide her/his identity in denouncements his/her going to make. All applications must be made in Turkish and they are concluded within 30 days.

GM at Ministry Level: In addition to CİMER, MoAF has its own communication center called **TİMER** (Tarım İletişim Merkezi – Agriculture Communication Center) is the communication center of Ministry of Agriculture and Forestry. It can be reached via telephone (Alo 180) and website (<https://timer.tarimorman.gov.tr/>). The applications to TİMER is received through www.turkiye.gov.tr, and thus requires identity verification. It can be used for requests, recommendations, denunciations, questions, thanks and other things under livestock, agriculture, administration, food, forest and water. If the applicant wanted to be called back, s/he can choose the way for communication (telephone, e-mail, internet). The identity number is not required for the applications done via telephone. Questions/problems that can be answered immediately are answered immediately; Questions/problems that cannot be answered immediately are directed to the relevant units. In line with the information received from the relevant units, feedback is given to complainants. It is possible to make inquiries according to person, province, district, subject or category.

10.2. GM at Project Level

In addition to above grievance processes, the project shall have its own, project specific grievance mechanism announced in its and MoAF's website with contact details. This grievance mechanism will cover all the issues raised in ESSs that are within the coverage of the Project except ESS2. It will have 2 tiers as PIUs and PCU. Following points should be taken into consideration in elaborating the grievance mechanism.

- The stakeholder can make comment/complaint through different channels including website, e-mail, telephone, grievance forms or petitions. The deadline for responses should be clearly stated.
- Petitions will be accepted by the Project focal points in District or Provincial Directorates of MoAF.
- Grievance forms will be available at every consultation meeting and will be delivered upon request.

- Grievances stated verbally in the consultation meetings will also be documented through meeting minutes and they will be processed as written in **Review of Comments** under section **Hata! Başvuru kaynağı bulunamadı.** and in this section.
- If the received comment/complaint is not relevant to Project and if the application is not anonymous, then s/he will be informed back that comment/complaint s/he issued is not relevant to Project.
- If the received comment/complaint is relevant to Project, s/he will be informed back within 30 days with the result unless the application was anonymous.
- The applicant shall have choice to hide his or her identity or anonymously apply.
- The stakeholders will be informed and guided that their first application should be at first tier basis. If the stakeholder is not satisfied with the result s/he gets from the first tier, then s/he will be free to appeal second tier. Or, in cases where the responsible party is the subject of complaint, the complaint can be directly done to second tier. In cases where the second tier is the subject of complaint, the complaints should be made by TİMER or CİMER.
- Grievances will be registered in writing and maintained in a database that can be queried according to
 - Date and the registry number of the grievance
 - Type of the channel where the grievance is made through
 - If available, the specific activity of the subcomponent that is subject to grievance
 - Identity number, name (stakeholders will be free to provide this information)
 - Vulnerability status (including age, disability status, gender, etc. which will be defined specifically for the sub-component)
 - Category of the grievance (specifically defined for the sub-component)
 - Text and the attachments of the grievance (if any)
 - Deadline for the reply and the actual date if the grievance is replied.
 - Name of the authority, that will handle the grievance
 - Proposed solution for the grievance.
 - The satisfaction of the stakeholder from the solution (if can be obtained)
 - Comments of the authority that replied for the grievance (if any)
- In registry and filing of grievances, the provisions of Personal Data Protection Law No. 6698 is should be used as the mainframe, and the stakeholders should be informed precisely about the process of the grievance mechanism and how the data they provided will be stored, used and reported.
- The database should be accessible to authorized personnel in PIUs and PCUs

10.3. Appeal Mechanism

If the complaint is still not resolved, the complainant may escalate/appeal to a higher level of GM within the project at the central level. If she/he is not satisfied with the decision, then she/he can submit his/her complaint to the appropriate court of law. The Project workers' grievance mechanism will not prevent workers to any other judicial mechanisms.

10.1. GM Communication and Process

Information about the project's GM will be publicized as part of the initial feedback consultations in the participating stakeholders. Information about the GM will also be posted online on the MoAF's website as well through a brochure in Turkish.

Information about the existence of the grievance mechanism will be readily available to all project workers (direct and contracted) through notice boards, the presence of "suggestion/complaint boxes", and other means as needed. Project workers will be informed about the existence of the GM through notice boards, the presence of suggestion/complaint boxes", and other means as needed.

The workers' grievance mechanism will be described in staff induction trainings, which will be provided to all project workers. The mechanism will be based on the following principles;

Mismanagement, misuse of Project Funds or corrupt practices, and

Violation of Project policies, guidelines, or procedures, including those related to child labor, health and safety of community/contract workers and gender violence, and environmental issues.

Grievances that may arise from stakeholders and other interested parties of the project who are dissatisfied with implementation methods or other implementation related process of the project and related components, and

General feedback, questions, suggestions, compliments

10.2. Addressing SEA/SH in GMs

10.3. The project's identified risk for SEA/SH is low. However, the GM for workers shall include handling complaints about sexual exploitation and abuse (SEA) and sexual harassment (SH). A SEA/SH referral pathway will be established and updated in line with legal requirements of the country. The GM will have in place mechanisms for confidential reporting with safe and ethical documenting of SEA/SH issues. Further, the GM will also have in place processes to immediately notify both the MoAF and the World Bank of any SEA/SH complaints, with the consent of the survivor. Monitoring and Reporting

The PIUs' GM focal points will be responsible,

- to collect and analyze qualitative data from the Contractors' GM Focal Points on the number, substance and status of complaints and uploading them into the single project database.
- to monitor outstanding issues and to propose measures to resolve them, and
- to submit semi-annual reports to **GM focal point at PCU.**

The reports to be submitted by the PIU shall include a section related to GM which provides updated information on the following:

- Status of GM implementation
- Qualitative data on number of received grievances/(applications, suggestions, complaints, requests, positive feedback), number of resolved grievances;
- Quantitative data on the type of grievances and responses, issues provided and grievances that remain unresolved; and
- Any correction measures taken.

The Contractors will prepare and submit monthly reports about on the Workers' GM to the GM focal point of the relevant PIU on the following issues;

- Number of grievances by category (complaint, feedback, concern)
- Number of solved and outstanding issues
- Satisfaction levels of the workers on solved grievances.
- Any correction measures taken.

11. Contractor Management

Most of the activities of the Project will be contracted. The contracts will include provisions related to labor and occupational health and safety as provided in the World Bank Standard Procurement Documents and national legislation.

For contractor selections below criteria will be considered:

- previous works completed,
- qualification of contractor's human resources,
- compliance in health and safety issues,
- precautions taken on child labor and forced labor employment.

According to the selection criteria, the ones who comply the best will be selected as contractors.

During the implementation phase of the services, the RUs or PIUs (in case of Subcomponent 1.2) will organize planned and unplanned visits to contractors' offices and/or place where work is being performed. In these visits the progress achieved, health and safety-related issues and child and forced labor employment status will be observed. If any dispute is determined the supplier will be notified to prevent the dispute in no more than 20 calendar days. If the dispute still exists after 20 calendar days the agreement with the supplier will be terminated immediately.

12. Primary Suppliers

Primary suppliers will be subjected to ESS2 requirements that will be specified and guided in the contractual agreements between MoAF and suppliers.

Contractors will be required to carry out due diligence procedure to identify if there are significant risks that their primary suppliers are exploiting child or forced labor or exposing worker to serious safety issues. In instances where foreign suppliers are likely to be contracted, the Contractor will be required to inquire during his/her procurement process whether the supplier has been accused or sanctioned for any of these issues and also their corporate requirements related to child labor, forced labor, and safety. If there are any risks related to child and forced labor, and safety identified, the Contractor will notify PIUs and will address these risks and may avoid such suppliers, where possible.

Specific requirements on child labor, forced labor and work safety issues will be included in all purchasing orders and contracts with suppliers. Considering that most of the primary supply workers will be local, necessary audits and controls will be made to ensure that suppliers provide safe working conditions in accordance with local legislation and ESS2.

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References

1. 2016. "World Bank Environmental and Social Framework." World Bank, Washington, DC.
2. 2018. "GUIDANCE NOTE FOR BORROWERS: ESS2: Labor and Working Conditions"
3. EHSG Guidelines:
https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines
4. 2017. "Good Practice Note: Managing Contractors' Environmental and Social Performance." World Bank Group, Washington, DC. https://www.ifc.org/wps/wcm/connect/03ff53f4-24e2-4526-8bc1-60bec0638b93/p_GPN_ESContractorManagement.pdf?MOD=AJPERES
5. https://www.ipieca.org/media/4666/worker_grievance_mechanisms_lrsc_2019.pdf
6. Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works
7. 2007. "Environmental, Health, and Safety General Guidelines." IFC.

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Annex 1: Code of Conduct

Code of Conduct

[Note to Client: for supervision of civil works contracts:

A minimum requirement for the Code of Conduct should be set out by the Client, taking into consideration the issues, impacts, and mitigation measures identified, for example, in:

- *project reports e.g. ESIA/ESMP*
- *any particular GBV/SEA requirements*
- *consent/permit conditions (regulatory authority conditions attached to any permits or approvals for the project)*
- *required standards including World Bank Group EHS Guidelines*
- *relevant international conventions, standards or treaties, etc., national, legal and/or regulatory requirements and standards (where these represent higher standards than the WBG EHS Guidelines)*
- *relevant standards e.g. Workers' Accommodation: Process and Standards (IFC and EBRD)*
- *relevant sector standards e.g. workers' accommodation*
- *grievance redress mechanisms.*

The types of issues identified could include. risks associated with: labor influx, spread of communicable diseases, sexual harassment, gender based violence, illicit behavior and crime, and maintaining a safe environment etc.]

[Amend the following instructions to the Consultant taking into account the above considerations.]

A satisfactory code of conduct will contain obligations on all Consultant's Experts that are suitable to address the following issues, as a minimum. Additional obligations may be added to respond to particular concerns of the region, the location and the project sector or to specific project requirements. The code of conduct shall contain a statement that the term "child" / "children" means any person(s) under the age of 18 years.

The issues to be addressed include:

1. Compliance with applicable laws, rules, and regulations
2. Compliance with applicable health and safety requirements to protect the local community (including vulnerable and disadvantaged groups), the Consultant's Experts, the Client's personnel, and the Contractor's personnel, including sub-contractors and day workers (including wearing prescribed personal protective equipment, preventing avoidable accidents and a duty to report conditions or practices that pose a safety hazard or threaten the environment)
3. The use of illegal substances
4. Non-Discrimination in dealing with the local community (including vulnerable and disadvantaged groups), the Consultant's Experts, the Client's personnel, and the Contractor's personnel, including sub-contractors and day workers (for example, on the basis of family status, ethnicity, race, gender, religion, language, marital status, age, disability (physical and mental), sexual orientation, gender identity, political conviction or social, civic, or health status)
5. Interactions with the local community(ies), members of the local community (ies), and any affected person(s) (for example to convey an attitude of respect, including to their culture and traditions)
6. Sexual harassment (for example to prohibit use of language or behavior, in particular towards women and/or children, that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate)
7. Violence, including sexual and/or gender based violence (for example acts that inflict physical, mental or sexual harm or suffering, threats of such acts, coercion, and deprivation of liberty)
8. Exploitation including sexual exploitation and abuse (for example the prohibition of the exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading behavior, exploitative behavior or abuse of power)

9. Protection of children (including prohibitions against sexual activity or abuse, or otherwise unacceptable behavior towards children, limiting interactions with children, and ensuring their safety in project areas)
10. Sanitation requirements (for example, to ensure workers use specified sanitary facilities provided by their employer and not open areas)
11. Avoidance of conflicts of interest (such that benefits, contracts, or employment, or any sort of preferential treatment or favors, are not provided to any person with whom there is a financial, family, or personal connection)
12. Respecting reasonable work instructions (including regarding environmental and social norms)
13. Protection and proper use of property (for example, to prohibit theft, carelessness or waste)
14. Duty to report violations of this Code
15. Non-retaliation against personnel who report violations of the Code, if that report is made in good faith

The Code of Conduct should be written in plain language and signed by each Expert to indicate that they have:

1. *received a copy of the code;*
2. *had the code explained to them;*
3. *acknowledged that adherence to this Code of Conduct is a condition of employment; and*
4. *understood that violations of the Code can result in serious consequences, up to and including dismissal, or referral to legal authorities.*

A copy of the code shall be displayed in the Engineer's office. It shall be provided in appropriate languages.