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MINISTRY OF AGRICULTURE AND FORESTRY

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



**TURKEY CLIMATE SMART AND COMPETITIVE AGRICULTURAL
GROWTH PROJECT
(TUCSAP)**

**LABOR MANAGEMENT PROCEDURES
(LMP)**

January 2022

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List of Abbreviations

| | |
|--------|--|
| ABDGM | : Directorate General of European Union and Foreign Relations |
| BSL | : Biosafety Level |
| BTGM | : Directorate General of Information Technologies |
| CoC | : Code of Conduct |
| CSA | : Climate Smart Agriculture |
| E&S | : Environmental and Social |
| EHSGs | : World Bank Group Environmental, Health and Safety Guidelines |
| ESF | : Environmental and Social Framework |
| ESIA | : Environmental and Social Impact Assessment |
| ESMF | : Environmental and Social Management Framework |
| ESMP | : Environmental and Social Management Plan |
| ESSs | : Environmental and Social Standards |
| GBV | : Gender-Based violence |
| GD | : General Directorate |
| GHG | : Greenhouse Gas |
| GKGM | : Directorate General of Food and Control |
| GM | : Grievance Mechanism |
| GRS | : Grievance Redress Service |
| IPM | : Integrated Pest Management |
| LMP | : Labor Management Procedures |
| M&E | : Monitoring and Evaluation |
| MoAF | : Ministry of Agriculture and Forestry |
| NVZ | : Nitrate Vulnerable Zone |
| OHS | : Occupational Health and Safety |
| PCU | : Project Coordination Unit |
| PIU | : Project Implementation Unit |
| RD&I | : Research, Development and Innovation |
| SEA/SH | : Sexual Exploitation and Abuse/Sexual Harassment |
| TAGEM | : Directorate General of Agricultural Research and Policies |
| TDİOSB | : Specialized Organized Industrial Zone Based on Agriculture |
| ToR | : Terms of Reference |
| TRGM | : Directorate General of Agricultural Reform |
| TUCSAP | : Turkey Climate Smart and Competitive Agricultural Growth Project |
| WB | : World Bank |

Glossary

Grievance Mechanism (GM) is an accessible and inclusive system, process, or procedure that receives and acts upon complaints and suggestions for improvement in a timely fashion and facilitates resolution of concerns and grievances arising in connection with a project.

Labor Management Procedures (LMP) identifies categories of project workers likely to be involved in the proposed project and determines how to meet the requirements of ESS2 and national legislation that are applicable to these categories.

Proposed Project refers to “Turkey Climate Smart and Competitive Agricultural Growth Project”.

Project Coordination Unit (PCU) refers to the staff of the unit established under the Directorate General of European Union and Foreign Relations (ABDGM) who are responsible for the overall coordination of proposed Project, including monitoring and reporting to World Bank.

Project Implementation Units (PIUs) refer to the staff of four PIUs which is established under Directorate General of Agricultural Reform (TRGM), Directorate General of Food and Control (GKGM), Directorate General of Information Technologies (BTGM) and Directorate General of Agricultural Research and Policies (TAGEM) and responsible for the implementation of the project, including the preparation and implementation of ESF Instruments.

Stakeholder refers to individuals or groups who: (a) are affected or likely to be affected by the project (project-affected parties); (b) may have an interest in the project (other interested parties); and (c) vulnerable groups.

TUCSAP refers to “Turkey Climate Smart and Competitive Agricultural Growth Project”.

Executive Summary

This Labor Management Procedures (LMP) is developed for the proposed “Turkey Climate Smart and Competitive Agricultural Growth Project” which is implemented by the Ministry of Agriculture and Forestry (MoAF) on behalf of Government of Turkey and funded by World Bank (WB). It is prepared in line with the *Environmental and Social Standard (ESS) 2 Labor and Working Conditions* of the WB’s Environmental and Social Framework (ESF) and is an integral part of the Proposed Project’s Environmental and Social Management Framework (ESMF).

The Proposed Project will support the agri-food sector in transitioning toward a more sustainable, competitive and climate-smart growth orientation by enhancing capacity in a range of areas, including information generation and dissemination to contribute to sustainable soil and land-use planning/management; agricultural data collection and analysis; and animal health aspects and by supporting innovation and the use of smart farming/climate-smart technologies and practices by farmers and agricultural enterprises. The proposed Project investments are expected to contribute to increased agricultural productivity/competitiveness, resilience, and sustainability.

The Project Development Objective (PDO) is to strengthen capacity for sustainable and competitive agricultural growth and promote the use of climate-smart agriculture in targeted regions in Turkey.

Project Components. The project will be implemented through four components:

- 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
 - Subcomponent 1.2: MoAF digital blueprint for sectoral information collection and management
- Component 2: Enhancing animal health capacity for effective disease surveillance, diagnostics and control
 - Subcomponent 2.1: Strengthening the capacity of animal health institutes
 - Subcomponent 2.2: Strengthening and improving veterinary medicine product control for animal infectious and vector-borne diseases and zoonoses
- Component 3: Investments for Enhanced Productivity, Resource-Efficiency, and Climate Resilience
 - Subcomponent 3.1: Strengthening climate resilience, productivity, and resource-use efficiency in horticultural production
 - Subcomponent 3.2: Promoting the adoption of CSA technologies/practices across relevant crops
 - Subcomponent 3.3: Reducing cattle production pressures on water pollution and GHG emissions
 - Subcomponent 3.4: Research and innovations to support CSA
- Component 4: Project Management, Monitoring, and Evaluation

Objective of the LMP. LMP describes the requirements with regard to labor and working conditions applicable during the pre-construction, construction and operation phases of the project. It aims to promote fair and equitable labor practices for the fair treatment, non-discrimination and equal opportunity of workers in all subprojects and aims to protect project workers’ rights and ensure the management and control of activities that may pose labor-related risks.

Scope of the LMP. 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.

1. Introduction

This Labor Management Procedures (LMP) 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 Agricultural Growth Project”, 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 and aims to protect project workers’ rights and ensure the management and control of activities that may pose labor-related risks.

This LMP 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 LMP assesses potential labor risks and impacts and describes how they will be mitigated and managed. 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.

2. Project Background

2.1. Project Development Objective

The project will support the agri-food sector in transitioning toward a more sustainable, competitive and climate-smart growth orientation by enhancing capacity in a range of areas, including information generation and dissemination to contribute to sustainable soil and land-use planning/management; agricultural data collection and analysis; and animal health aspects and by supporting innovation and the use of smart farming/climate-smart technologies and practices by farmers and agricultural enterprises. The Project investments are expected to contribute to increased agricultural productivity/competitiveness, resilience, and sustainability.

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.

2.1. Project Components

The project will be implemented through four components.

The project will be implemented by the General Directorates (GDs) of Ministry of Agriculture and Forestry (MoAF) through four components which are briefly described in below paragraphs.

Component 1: Institutional Capacity Strengthening for Climate Smart Agri-food Policy, Planning, and Investments. Activities under this component will support the strengthening of broad sectoral capacity, 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. Component activities will also enhance MoAF's digital blueprint for data collection and information management to contribute to effective policy monitoring and programming and support improved decision-making across the sector. 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. The Directorate General of Agricultural Reform (TRGM) will lead the implementation of this subcomponent. Soil and land use are major contributors to GHG emissions mainly through land use changes and nutrient management. Yet, they also play an important role in climate change mitigation by acting as a carbon sink, through adoption of Climate Smart Agriculture (CSA) and the protection and rehabilitation of marginal and degraded lands and forests. Healthy soils are also essential for ensuing resilient production. This subcomponent will support the generation of key information and narrowing of capacity gaps in relation to Turkey's soils/land natural capital, to contribute to its sustainable planning and management, generating climate co-benefits. Subcomponent 1.1 will finance mainly specialized technical services, investments in equipment, small civil works and computer infrastructure and training. Subcomponent activities will be implemented into the following four sequential output blocks:

- *Determination of soils land resources/assets:* Detailed soil surveys and analysis will be carried out, followed by the preparation of soil classifications maps (1:5,000 scale) in approximately 14 million hectares. A national soil archive will be established to preserve soil sample following international standards.
- *Digital national profile soil database:* Activities will strengthen this database, hosting soil/land profile information and soil threats thematic maps, to improve its functionality and capability.

- *System and service development:* Activities to be supported include:
 - the development of soil/land spatial data infrastructure and national soil & land information system,
 - the establishment of a) national soil monitoring subsystem for soil selected indicators, b) dynamic modelling/mapping, including the identification of soil monitoring sites for periodic monitoring of soil threats, nationally and c) a geospatial soil organic carbon information system submodule of the soil/land spatial data infrastructure (as part of ii. a), and
 - the development of data sharing and use policies aligned with international good practice experience. The systems & services to be supported will contribute to develop and guide sectoral climate change mitigation and adaptation strategies.
- *Land cover classifications:* Land classifications will be carried out in 78.3 million hectares to use as the basis for preparing land utilization notes delimitating the Turkish agricultural frontier (agricultural land versus other uses). The subcomponent will also support the development and piloting of a decision support system for crop suitability and land planning.

Capacity building activities will be implemented across the four above output activities and will be targeted to generators and users of the soil and land information, including MoAF staff. Awareness campaigns, dissemination and training with specific tools developed by the proposed project will target particularly local provincial governments and provincial Soil Conservation Boards. To facilitate data use by different stakeholders, the subcomponent will support upgrading, developing and/or validating user-friendly applications (e.g. via mobile phone) on soil and land information generated by the project.

Subcomponent 1.2: MoAF digital blueprint for sectoral information collection and management. This subcomponent will be led by the Directorate General of Information Technologies (BTGM) in close coordination with TRGM and other GDs as relevant. Activities will enhance MoAF's capacity for data collection and sectoral information management to support smart climate sectoral policy and planning. The subcomponent will support the development, testing and implementation of improved data collection methods and modelling approaches for monitoring crop production and yields, provide production forecasts and overall contribute to agriculture planning (also considering climate change aspects) for food price monitoring, food security assessments, and other applications. Activities will support stakeholder consultations; analysis of data collection and modeling approaches implemented by other countries for crop/yield and production forecasting (including application of disrupting technologies); the design and piloting of modelling approaches for Turkey, and the preparation and implementation of a roadmap for the institutionalization of those modelling approaches. Upgrades and integration of current institutional information systems to enhance monitoring of agriculture support programs will also be supported. The subcomponent will finance mainly specialized consulting services, investments in equipment and computer infrastructure, and training.

Component 2: Enhancing animal health capacity for effective disease surveillance, diagnostics and control: Climate change increases livestock susceptibility to diseases and influences the emergence and proliferation of disease hosts and vectors. Effective animal disease surveillance and diagnostic capabilities along with veterinary medicines and vaccines are needed to prevent or control emerging and re-emerging animal diseases and zoonoses. This component will support Directorate General of

Food and Control (GKGM) on strengthening these important public functions. The component will follow the best practice (i.e. World Organization for Animal Health, EU) to support feasibility assessments, laboratory facilities, laboratory equipment, technical training for staff (as per the National Reference Laboratory defined plan for all laboratories), and information systems. Designs to maximize green and resilient (e.g. energy saving, seismic resistance) elements in infrastructure and equipment will be considered in the feasibility assessment. Activities under this component will be implemented through two subcomponents.

Subcomponent 2.1: Strengthening the capacity of animal health institutes. The subcomponent will strengthen capacity of the GKGM Control to deal with introduction and spread of animal diseases and zoonoses due to climate and non-climate related factors via improvements in capacity for animal disease surveillance and diagnostics of infectious and vector-borne diseases. Investments will support increase biosafety laboratory infrastructure to BSL2 and BSL3, information systems and capacity building of MoAF's network of animal health institutes (Veterinary Control Institutes [VCIs]) located in the provinces of Adana, Elazig, Erzurum, Konya, Samsun, Izmir and Istanbul. The project will specifically support upgrades to the institutes' infrastructure to increase the Biosafety Level (BSL-BSL2&BSL3) of laboratory units through investments in critical construction work, biosafety, and biosecurity trainings as well as the establishment of a common laboratory information management system for the targeted institutes. A detailed needs assessment and analysis of upgrades required in each laboratory will be undertaken during the first year of project implementation. The project will also support the development of a national animal-health laboratory policy. These laboratories institutes provide key services on animal disease diagnostics, analysis, research, and training, and also serve as national reference services for specific animal diseases.

All laboratories are accredited by TURKAK to ISO Standard 17025 to ensure provision of accurate and reliable test results for selected priority animal diseases. They are required to participate regularly in specified inter-laboratory proficiency testing for quality assurance and accreditation purposes. Currently, Turkey utilizes international laboratories (i.e., UK, France) for this purpose, and the subcomponent investment will support a designated laboratory in Turkey to be ISO 17043-accredited in order to provide inter-laboratory proficiency testing schemes to veterinary laboratories in Turkey and other countries in the region.

Subcomponent 2.2: Strengthening and improving veterinary medicine product control for animal infectious and vector-borne diseases and zoonoses. Effective disease controls are critical to reduce the proliferation and resurgence of animal diseases, exacerbated by climate change. This subcomponent will support activities to improve the capacity of Turkey to control and regulate veterinary medicines and vaccines to ensure that effective and high-quality products reach the market. It will do so, by supporting the establishment of a centralized Veterinary Medicine Control Center (VETKOM), bringing together the functions that are now disaggregated through different veterinary institutes and enable in-country veterinary medicine/vaccine efficacy and safety tests which are currently carried out abroad and costly. The project will invest in construction works, equipment, and technical services to build: i) test, analyses, and administrative facilities; ii) a national vaccine strain collection bank (BSL3); and iii) experimental laboratory units (BSL3). Activities will also support capacity building and training (also covering climate-related topics as appropriate), and some operational costs. The new center is expected to be self-sustaining, over time, through the provision of fee for services (licensing, good manufacturing practices inspections, training and expert services, etc.) to the private sector i.e. manufactures, importers, exporters etc. A detailed feasibility

assessment, including a detailed Environmental and Social (E&S) assessment, and business planning will be undertaken the first year of project implementation, analyzing issues of location, technical design, E&S risks and mitigation options, cost and sustainability; visits by MoAF staff to international reference centers will also inform the assessment.

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, Development and Innovation (RD&I) efforts. The adoption of CSA technologies and practices will contribute to improved agriculture performance via productivity gains, cost reductions, promoting more efficient resource-use (fertilizers, pesticides, energy, water), and improved climate resilience, while generating also important climate mitigation benefits and reducing pollution. Investments under this component are also expected to generate key agricultural data to support decision making by farmers and enterprises and to inform policy design. The component will encourage the uptake and effective use of innovative/disruptive CSA technologies/ practices by closing knowledge and skill gaps and by providing financial support and technical assistance to producers and enterprises. Activities supported under Component 3 will be implemented through four subcomponents.

Subcomponent 3.1: Strengthening climate resilience, productivity, and resource-use efficiency in horticultural production. Price and supply fluctuations are a recurrent problem in Turkey's horticultural production (particularly of vegetables) 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. In most recent years, the government has committed to increase the energy and overall efficiency of greenhouse production. Geothermal energy in modern, technology-based greenhouses can replace fossil fuel, reducing energy costs, energy consumption, and the environmental footprint of greenhouse production. MoAF is operationalizing clustered investments in geothermal-based greenhouse infrastructure under the Specialized Organized Industrial Zone Based on Agriculture—TDİOSB (Tarıma Dayalı İhtisas Organize Sanayi Bölgesi—TDİOSB).. Implementation has been slow owing to the complexities in governance structure and business model. Subcomponent 3.1 will pilot an alternative geothermal greenhouse business model to build infrastructure and mobilize private (including small-middle size) investors more rapidly, while maintaining the advantages of a cluster. The model will be piloted in at least one site (depending on final cost assessments), selected among the 14 sites where feasibility studies have already been undertaken by MoAF. Funds will cover consulting services for zone planning and geological surveys, works on basic enabling structure (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.), and studies and feasibility analysis of different investment models and dissemination and outreach activities to target partnerships with the private sector. TRGM will lead the implementation of these activities.

Subcomponent 3.2: Promoting the adoption of CSA technologies/practices across relevant crops. To be implemented by TRGM in close collaboration with Directorate General of Agricultural Research and Policies (TAGEM). The subcomponent will 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. Activities will focus on demonstrating and innovating, with careful attention paid to assure replicability and inform policies.

Activities will focus on supporting awareness & dissemination and specific investment to support acquisition of emerging digital CSA technologies suitable for small and medium farm enterprises that are commercially available in Turkey. This will be done in partnership with the private sector to share the costs of acquiring equipment/machinery and related goods, license fees for remote sensing and cloud-based analytical services, and training. A matching grant (cost-sharing) mechanism will be established, with separate windows [tbd] targeting producer organizations; agribusinesses promoting contract farming, private service providers targeting small and medium farm enterprises, and potentially also individual farmers. Special attention will be paid to using gender appropriate communication channels to reach women to address constraints on accessing agriculture advisory services and support. Increased access to CSA digital technologies will contribute to lowering the use of fertilizer, pesticides, water, and energy and to stabilize or increase yields thereby supporting climate change adaptation and mitigation.

Local stakeholder engagement, sensitization about digital CSAs, as well as related training and capacity building will be implemented in close partnership with technology providers, universities and other relevant entities complementing the grant program. 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.

Subcomponent 3.3: Reducing cattle production pressures on water pollution and GHG emissions. Subcomponent activities will be implemented by TRGM. Activities will pilot and promote innovative approaches for manure management to overcome existing knowledge, physical and logistical barriers. Activities will support establishment of stakeholder information network around manure management experience and knowledge; training of professionals on manure management services; a pilot for encouraging third-party manure collection and biofertilizer processing, potentially linked to biogas generation, and policy analysis. The subcomponent will finance construction works and equipment, equipment for transportation and application of biofertilizer in fields, training and demonstrations and specialized consulting services. The subcomponent will focus on the Küçük Menderes Subbasin of the Küçük Menderes River Basin (in the Aegean region) identified by MoAF as a Nitrate Vulnerable Zone. It will focus on areas where there is a significant presence of medium/large sized cattle farms and a lack of proper manure collection/storage facilities in compliance with Good Agricultural Practice (GAP) code (potentially in one or two of the following districts Odemis, Tire, Kiraz and Torbali), enabling the local availability of biofertilizers to displace chemical fertilizers and generation of biogas for energy.

Subcomponent 3.4: Research and innovations to support CSA. Activities under this subcomponent will be implemented by TAGEM. While subcomponent 3.2 will focus on validating and mainstreaming commercially available technologies, this subcomponent focuses on the development, validation and dissemination of in-house (by TAGEM) CSA agricultural technologies and management practices. Activities under this subcomponent will support the implementation of a RD&I agenda around CSA in alignment with priorities identified in the recently launched Green Deal Plan 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 (IPM) systems (particularly for export crops facing significant rejections in export markets i.e. pepper, 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 activities will include also purchasing and installing new equipment for the research institutes and small-scale civil works for refurbishing of their existing facilities. TAGEM's RD&I efforts will include considerations of women's needs and unique priorities when generating, validating and dissemination CSA technologies. The subcomponent activities will contribute positively to mitigation by generating and/or disseminating alternative products/practices (IPM, biopesticides, solar-energy powered machinery).

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) at the Directorate General of European Union and Foreign Relations (ABDGM), and Project Implementation Units (PIUs) under TRGM, BTGM, TAGEM and GKGM, 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 implementation of 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 Procedures (LMP) will be applied.

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

| Subcomponent | Lead GD | Activity |
|--|---------|--|
| 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 | TRGM | <ul style="list-style-type: none"> • Determination of land and soil resources <ul style="list-style-type: none"> ○ Carrying out detailed soil surveys and analysis ○ Preparation of soil classification maps ○ Construction of building for national soil archive • Development of Digital National Soil Profile database • System and service development • Preparation of land cover classifications • Capacity building activities within MoAF |
| Subcomponent 1.2: MoAF digital blueprint for sectoral information collection and management | BTGM | <ul style="list-style-type: none"> • Analysis of data collection and modeling approaches implemented by other countries for crop/yield and production forecasting • Design and piloting of modelling approaches for Turkey • Preparation and implementation of a roadmap for the institutionalization of modelling approaches • Upgrading and integration of current institutional information systems |

| Subcomponent | Lead GD | Activity |
|---|---------|--|
| Component 2: Enhancing Animal Health Capacity for Effective Disease Surveillance, Diagnostics and Control | | |
| Subcomponent 2.1: Strengthening the capacity of animal health institutes | GKGM | <ul style="list-style-type: none"> • Upgrading the infrastructure of VCI to increase the Biosafety Level (BSL) of laboratory units • Establishment of a common laboratory information management system for the targeted institutes • Development of a national animal-health laboratory policy • Biosafety, and biosecurity trainings |
| Subcomponent 2.2: Strengthening and improving veterinary medicine product control of animal infectious and vector-borne diseases and zoonoses | GKGM | <ul style="list-style-type: none"> • Establishment of VETKOM <ul style="list-style-type: none"> ○ test, analyses and administrative facilities ○ national vaccine strain collection bank ○ experimental laboratory units • Capacity building and training activities within MoAF |
| Component 3: Investments for Enhanced Productivity, Resource-Efficiency, and Climate Resilience | | |
| Subcomponent 3.1: Strengthening climate resilience, productivity, and resource-use efficiency in horticultural production | TRGM | <ul style="list-style-type: none"> • Consulting services • Civil infrastructure and construction work for 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, etc. • Feasibility studies for different investment models |
| Subcomponent 3.2: Promoting the adoption of CSA technologies / practices across relevant crops | TRGM | <ul style="list-style-type: none"> • Supporting acquisition of emerging digital CSA technologies • Capacity building and training activities |
| Subcomponent 3.3: Reducing cattle production pressures on water pollution and GHG emissions | TRGM | <ul style="list-style-type: none"> • Establishment of stakeholder information network around manure management experience and knowledge • Training of professionals on manure management services • Pilot for encouraging third-party manure collection and biofertilizer processing, potentially linked to biogas generation • Policy analysis |
| Subcomponent 3.4: Research and innovations to support CSA | TAGEM | <ul style="list-style-type: none"> • Research, validation and dissemination efforts around IPM systems • Expanding the use of biofertilizers • Undertaking other climate-related dissemination activities around energy-saving technologies produced by TAGEM • Carrying out climate assessments. |
| Component 4: Project Management, Monitoring, and Evaluation | | |

| Subcomponent | Lead GD | Activity |
|--|---------|---|
| 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, M&E, E&S issues • E&S risk management, including preparation of site-specific E&S instruments required • Grievance redress, citizen engagement, and implementation of the communications • M&E of project activities |

2.1. Implementation Arrangements

Responsibility for overall project implementation, including management and coordination will lie with the MoAF, through the implementing units. The **Project Implementation Units (PIUs)** will be established at the leading GDs responsible for specific subcomponents as: TRGM (Subcomponents 1.1, 3.1, 3.2 and 3.3, GKGM (Component 2), BTGM (Subcomponent 1.2), TAGEM (Subcomponent 3.4), and ABDGM (Component 4). PIUs will be responsible of overseeing project activities under their respective subcomponents and ensure effective engagement with MoAF's units and relevant stakeholders at the provincial level.

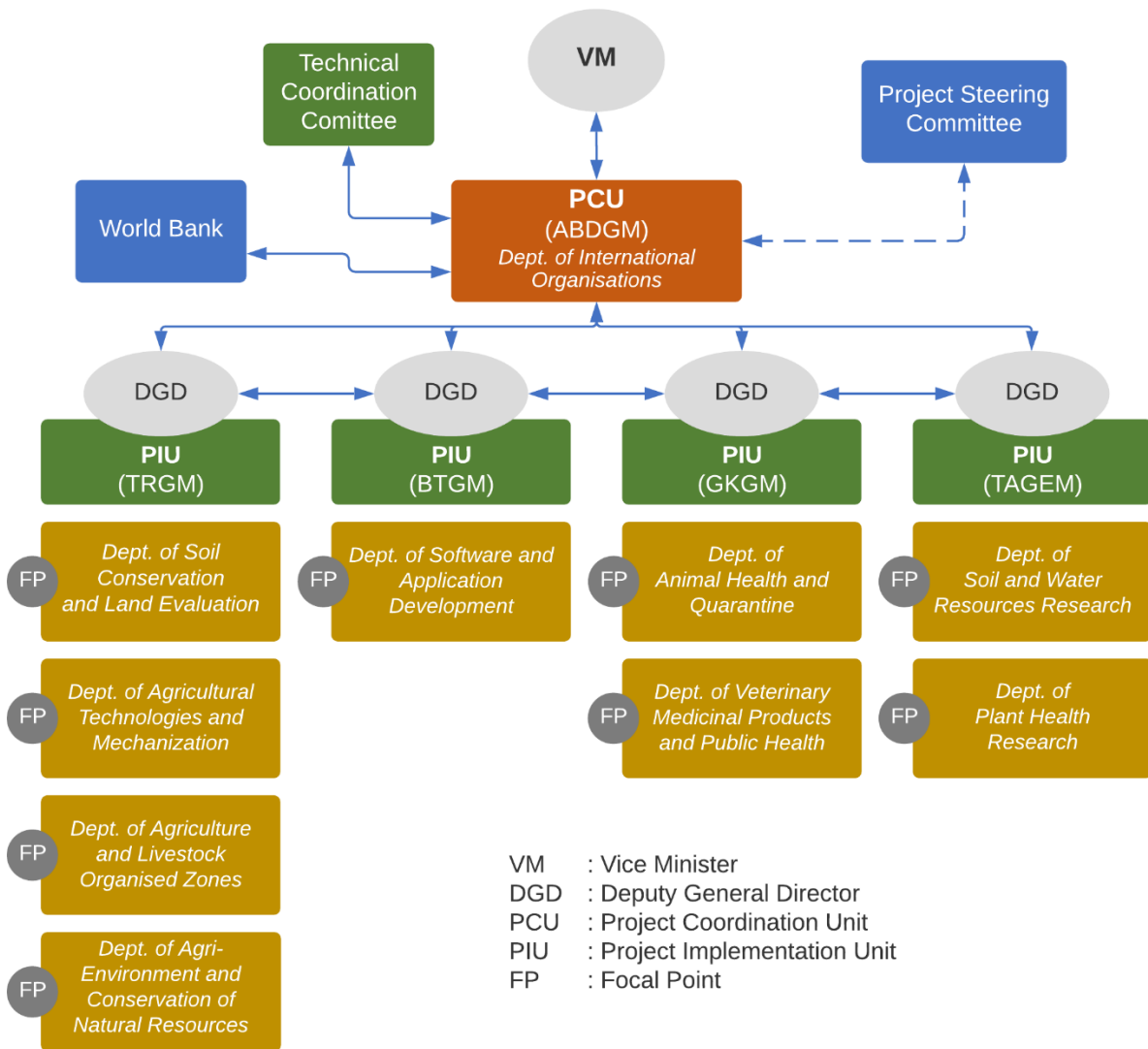
Within MoAF, overall responsibility for implementation will lie with the Vice Ministry hosting the Directorates that will lead the implementation of the components/subcomponents with the largest budget allocation, namely: TRGM and GKGM.

A **Project Coordinating Unit (PCU)** responsible for overall project coordination will be established under ABDGM. The PCU will be responsible for overseeing overall implementation and management of the project, ensuring proper application of all project-related requirements, and preparing all project documents to be submitted to the Bank. The PCU will host a dedicated multidisciplinary team of project management, technical, financial management, procurement, environmental, and social specialists with qualifications satisfactory to the World Bank. PCU's functions will be overseen by the leading Vice-Minister.

A **Project Steering Committee (PSC)** will be established to ensure effective coordination at a higher level and provide strategic advice. The PSC will have participation of senior leadership of the GDs leading implementation of the subcomponents, including Deputy General Directors from the relevant GDs (TRGM, GKGM, TAGEM, BTGM and ABDGM), as well as representatives of the Presidency's Strategy and Budget Office (SBO) and the Ministry of Treasury and Finance. The PSC will be chaired by the line Vice Minister of the MoAF (to which TRGM and GKGM report to), with the PCU acting as the Secretariat. The key functions of the PSC will be to review the Annual Workplans and Budgets, monitor implementation progress, ensure effective institutional coordination, and provide guidance as needed for ensuring the delivery of project outputs and achievement of project outcomes.

The proposed implementation structure is given in Figure 1.

Figure 1: Project Implementation Structure



Activities under each subcomponent will be implemented in close coordination with Provincial Organizations: Provincial and District Directorates for Subcomponents 1.1, 3.1 3.2 and 3.3, Veterinary Control Institutes for Subcomponent 2.1 and Research Institutes for Subcomponent 3.4. Field Officers (FO) will be appointed at Provincial Organizations to ensure coordination with PIUs. The activities under Subcomponent 1.2 and 2.2 will be carried out through the center organization of MoAF.

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 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 all 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 ESS 2 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 those will mainly engage in investment, site selection, plan, tendering and monitoring activities 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: 4857).
- **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/workers of;
 - information technology companies that will provide database and software related services
 - soil survey companies
 - construction firms

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.

- training firms
 - grant beneficiaries
- **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

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 1000, 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.

4. Brief Overview of Labor Legislation

Employee rights and responsibilities are defined by the following laws and regulations:

- Labor Law (No. 4857) and respective regulations, and
- Social Insurance and General Health Insurance Law (No. 5510) and respective regulations.

Terms and Conditions of Labor Legislation

The Labor Law, which regulates the working environment and the rights and responsibilities of the workers working on the basis of an employment contract with employers, is in force with the number 4857, since 22.05.2013.

This Law applies to all workplaces, excluding exceptions defines in Article 4, to employers, employer representatives and workers of these workplaces regardless of their field of activity.

Article 4 - The provisions of the Labor Law do not apply to the jobs and business relationships listed below:

- a) Sea and air transportation,
- b) Agricultural and forestry work and employing less than 50 employees,
- c) All kinds of family-run construction work related to agriculture,
- d) Home works and handicraft works are carrying out among the members of a family and their relatives up to the 3rd degree (includes 3rd degree) and no other person from outside,
- e) Domestic work,
- f) Apprentices,
- g) Sportsmen, and
- h) People in rehabilitation.

As it is seen, agricultural and forestry workplaces employing less than fifty-one workers are not covered by the Labor Law. During the implementation of projects within the scope of the Project, it will be convenient and required to establish a formal contract between employer and agricultural and forestry workers regardless of their number and to fulfill the obligations of the labor law.

The employers are expected to fulfill the obligations described under Section 3.

Non-Discrimination and Equal Opportunity

Article 5 of the Labor Law regulates the prohibition of discrimination in employment. According to the article "No discrimination based on language, race, sex, political opinion, philosophical belief, religion and sex or similar reasons is permissible in the employment relationship".

Unless there are essential reasons for differential treatment, the employer must not make any discrimination between a full-time and a part-time employee or an employee working under a fixed term employment contract (contract made for a definite period) and one working under an open-ended employment contract (contract made for an indefinite period).

Except for biological reasons or reasons related to the nature of the job, the employer must not make any discrimination, either directly or indirectly, against an employee in the conclusion, conditions, execution, and termination of his/her employment contract due to the employee's sex or maternity.

Freedom of Association

Workers and public officials have different union legislation. Workers were covered by the Unions and Collective Agreements Law (No. 6356) (dated on 07.11.2012, Official Gazette No. 28460).

According to Unions and Collective Agreements Law (No. 6356) (dated on 07.11.2012, Official Gazette No. 28460) Article 17:

- Those who are over the age of fifteen and deemed to be workers according to the provisions of this Law may be a member of labor unions.
- Those deemed to be employers within the meaning of this Law may become members of employer unions.
- It is free to join the union. No one can be forced to join or not to join the union. Workers or employers cannot be members of more than one union at the same time in the same industry.
- However, workers working in the same line of business and at the same time in workplaces belonging to different employers may be members of more than one union. In case the workers and employers are members of more than one union contrary to this provision, subsequent memberships are invalid.

Trade union freedom is guaranteed by Article 25 of this Law according to this, the recruitment of workers cannot be conditioned on whether they are members of any trade union or not.

On the other hand, public officials were covered by the Public Officials Unions and Collective Contract Law (No. 4688) (dated on 25.06.2001, Official Gazette No. 24460). According to this Law, Article 14:

- Public officials can become members of a union established in the service branch of their workplace.
- It is not possible to be a member of more than one union. Subsequent memberships are void in case of membership in more than one union.

Additionally, according to Article 18, the public employer cannot make a distinction between public officials whether they are members of any trade union or not.

Collective Dismissal

Article 29 defines the collective dismissal and its conditions. According to the Article:

When the employer contemplates collective terminations for reasons of an economic, technological, structural or similar nature necessitated by the requirements of the enterprise, the establishment or activity, s/he shall provide the union shop-stewards, the relevant regional directorate of labor and the Public Employment Office with written information at least 30 days prior to the intended lay-off.

A collective dismissal occurs when,

- in establishments employing between 20 and 100 employees, a minimum of 10 employees,
- in establishments employing between 101 and 300 employees, a minimum of 10% of employees,
- in establishments employing 301 and more workers, a minimum of 30 employees, are to be terminated in accordance with Article 17 of the Labor Law on the same date or at different dates within one month.

Wages and Deductions

Article 32 of Labor Law defines the wages as; “in general terms, wages are the amount paid to someone by the employer or third parties in exchange for a job and paid in money. As a rule, wages, premiums, and bonuses are paid, in Turkish money, to a bank account opened at the workplace or privately.

If the wage has been decided in terms of a foreign currency, it may be paid in Turkish money according to the currency rate on the date of payment. Wage payment must not be made in bonds, coupons or another paper claimed to represent the national currency valid in the country or by any other means whatsoever.

Wage may be paid on a monthly basis at the latest. The time of remuneration may be reduced down to one week by employment contract or by collective agreement. Statutory limitation on wage claims is five years.”

Working Hours

According to the Article 63 of Labor Law, duration of work will not exceed 45 hours per week. This does not include time for rest breaks. Where hours are not equally distributed during the week, the daily working time may not exceed 11 hours per day.

Rest Breaks

According to the Turkish Labor Law, Article 67, the beginning and ending of the daily working time and rest breaks shall be announced to workers at the establishment. Depending on the nature of activity, the beginning and ending times of work may be arranged differently for employees.

Rest breaks are regulated by Turkish Labor Law, Article 68 as follows;

- fifteen minutes, when the work lasts four hours or less,
- half an hour, when the work lasts longer than four hours and up to seven and a half hours (seven and a half included), and
- one hour, when the work lasts more than seven and a half hours.

According to the Labor Law, Article 46, the employees working in establishments covered by Labor Law shall be allowed to take a rest for a minimum of twenty-four hours (weekly rest day) without interruption within a seven-day time period. For the unworked rest day, the employer shall pay the employee’s daily wage, without any work obligation in return.

Annual Leave

According to the Labor Law, Article 53, employees who have completed a minimum of one year of service in the establishment since their recruitment, including the trial period, shall be allowed to take annual leave with pay. The length of the employee’s annual leave with pay shall not be less than:

- Fourteen days if his length of service is between one and five years, (five included),
- Twenty days if it is more than five and less than fifteen years, and
- Twenty-six days if it is fifteen years and more (fifteen included).

However, employees below the age of eighteen and above the age of fifty, the length of annual leave must not be less than twenty days.

It is stipulated in the 3rd clause of Article 53 of the Labor Law (No. 4857) that "The provisions of this Law regarding annual paid leaves are not applied to those who work in seasonal or campaign works

lasting less than one year due to their qualifications”. In that case, workers who work seasonally in a workplace are not entitled to annual paid leave.

Overtime Work

According to the Labor Law, Article 41, wages for each hour of overtime shall be remunerated at one and a half times the normal hourly rate. In cases where the weekly working time has been set by contract at less than forty-five hours, work that exceeds the average weekly working time done in conduction with the principles stated above and which may last only up to forty-five hours weekly is deemed to be work at extra hours. In work at extra hours, each extra hour shall be remunerated at one and a quarter times the normal hourly rate for workers who work less than 45 hours a week. If the employee who has worked overtime or at extra hours so wishes, rather than receiving overtime pay he may use, as free time, one-hour and thirty minutes for each hour worked overtime and one hour and fifteen minutes for each extra hour worked. The employee shall use the free time to which he is entitled within six months, within his working time and without any deduction in his wages. The employee’s consent shall be required for overtime work. Total overtime work shall not be more than two hundred seventy hours in a year.

Labor Disputes

Labor disputes are defined in Turkish Labor Law, Article 20. According to this article, the employee whose employment contract is terminated has to apply to the mediator in accordance with the provisions of the Labor Courts Law, with a request for reemployment within one month from the date of notification of termination, claiming that the reason is not indicated in the termination notice or the reason shown is not a valid reason.

The burden of proving that the termination was based on a valid reason shall rest on the employer. However, the burden of proof shall be on the employee if he claims that the termination was based on a reason different from the one presented by the employer.

The provisions on mediation are defined in the Law No. 6325 on Mediation in Legal Disputes.

Child Labor

The subject of child labor is defined in the Turkish legislation within the framework of the constitution, laws, and regulations. Table 2 presents the list of respective articles from the national legislations on child labor.

Table 2: National Legislation on Child Labor

| Legislation Name | Article No | Explanation |
|--|-------------------|---|
| The Constitution of the Republic of Turkey | 50 | Nobody can be employed in jobs that do not match their age, gender, and strength. Children, women, and those with physical and mental disabilities are specially protected in terms of working conditions |
| Labor Law (No. 4857) | 71 | The minimum employment age is 15. However, children who have completed the age of 14 and their primary education may be employed on light works that will not prevent their physical, mental, and moral development, and for those who continue their education, in jobs that will not prevent their school attendance. |

| Legislation Name | Article No | Explanation |
|---|------------|--|
| Regulation on the Procedures and Principles of Employing Child and Young Workers (06.04.2004/25425) | 6 | Children who have completed the compulsory primary school age and do not attend formal education cannot work more than seven hours a day and thirty-five hours a week. These periods can be increased up to eight hours a day and forty hours a week for children who have completed the age of fifteen. |
| Primary Education and Training Law (No. 222) | 59 | Those who do not attend compulsory primary education institutions cannot be employed (for a fee or for free) in any official and private workplaces. Those who document that they attend primary education institutions can be employed in such places except for the lecture hours provided that the provisions of the law regulating the employment of children are applied. |
| Child Protection Law (No. 5395) | 4 | The basic principles for the protection of the child rights are explained. |
| Prime Ministry Circular (2017/6) | 5 | Provincial Public Health Directorates are responsible for regular screening for seasonal agricultural workers and their families for cancer screening and for infectious and epidemic diseases, monitoring pregnant, infants and children, and for reproductive and women's health services with mobile teams or by assigning health personnel according to population density. |
| | 7 | The Provincial Directorate of National Education is obliged to take measures to ensure the continuing education of seasonal migrant agricultural workers' children. |
| Public Health Law (No. 1593) | 173 | Employment of all children under the age of 12 as labor and apprentice in all kinds of businesses, such as factories, workshops, mines is prohibited. |
| Vocational Training Law (No. 3308) | 13 | The owner of the workplace must make a written apprenticeship contract with the parent of the candidate before starting the apprentice. |
| Restructuring of Some Receivables and Social Insurance and General Health Insurance Law-6111 | 51 | In this article, it has been introduced that discontinuous workers in agriculture and forestry sectors will work with insurance and their insurance will be evaluated within the scope of 4 (a) at the same law. Agricultural workers under this insurance have been given the opportunity to benefit from work accident, occupational disease, disability, old age, death insurance and general health insurance. |

In addition to national legislations, Turkey has a large number of national programs and policies on child labor which are provided in Table 3.

Table 3: National Policies and Actions on Child Labor

| Policy Title | Scope |
|--|---|
| The National Time-Bound Policy and Program Framework (TBPPF) | TBPPF aims to eliminate the worst forms of child labor by 2015, has been developed in 2005 with the support of the ILO. |
| National Program on the Elimination of Child Labor (2017–2023) | Identifies seasonal migratory agriculture, street work, and work in small and medium industrial enterprises as priority sectors for government efforts to combat child labor. Outlines a series of nationwide |

| Policy Title | Scope |
|--|---|
| | interventions aimed at eliminating child labor, including combating poverty, inclusive education, and increasing social awareness. In 2018, the Turkish Government continued its implementation. |
| Joint Declaration of the Elimination of Child Labor | In 2018, the Turkish Government contributed to the National Program on the Elimination of Child Labor objectives by signing a Joint Declaration of the Elimination of Child Labor, declaring 2018 as the Year of Elimination of Child Labor. |
| Second National Action Plan on Combating Human Trafficking | Outlines Turkey's strategy for the prevention of human trafficking. Identifies children as an exceptionally vulnerable group and calls for special security precautions for children at shelters for victims and increased international cooperation on preventing child trafficking. |
| National Employment Strategy (2014–2023) | Aims to identify and solve labor market issues, with the goal of job creation and sustained economic growth. Includes the prevention of child labor, especially hazardous work in agriculture, as a focus of the plan. Advocates for increased access to education and strengthened social services as a means of preventing child labor. Initiatives in the new action plans include requiring Provincial Employment and Occupational Education Boards to evaluate progress in combating child labor locally and organizing activities to raise awareness about child labor in connection with the World Day Against Child Labor. The Monitoring and Evaluation Board met in 2018 to review actions taken against child labor. |
| Eleventh Development Plan (2019–2023) | Identifies Turkey's strategy and goals for economic development. Includes the priorities of alleviating child poverty and increasing equal opportunity in education. Includes provisions for the prevention of the worst forms of child labor. 609. Child labor will be combated, particularly in the streets, in heavy and dangerous works, in paid, mobile and temporary agricultural works, excluding family works. 609.1. Social awareness will be developed in the field of combating child labor. 609.2. Units for Combating Child Labor will be expanded in 81 provinces, and they will be made more effective in order to develop cooperation and coordination with relevant institutions and organizations working in the field of combating child labor locally. |

The list of international programs in which Turkey is a party and has an important role are provided in Table 4.

Table 4: International Programs on Child Labor

| Program Title | Scope |
|---|---|
| The International Program for the Elimination of Child Labor (IPEC) – (1992-2008) | Turkey was one of the first six countries to participate to IPEC in 1992. The ensuing program support delivered by ILO-IPEC, was formulated jointly with the Turkish Government in coherence with national policies and objectives. Since that time, Turkey has been working on reducing incidences of child labor and has made progress in ensuring children's rights. In the context of IPEC, a number of projects have been implemented. |

| Program Title | Scope |
|---|--|
| UNICEF in Turkey | UNICEF in Turkey works to eliminate child labor targeting Turkish and refugee children through a multi-sectoral strategy involving capacity development, support to services for families at risk, and evidence generation and advocacy. They work in partnership with ministries, employer associations, municipalities, NGOs, and other UN agencies. |
| Further Programs to address child labor | Conditional Education and Health Care Assistance Program Programs for Syrian Refugee Children Programs focused on Human Trafficking |

Forced Labor

Turkish Labor Law does not cover forced labor issues. However, the Constitution of the Republic of Turkey, Article 18 prohibits forced labor.

“No one shall be forced to work. Forced labor is prohibited. Work required of an individual while serving a sentence or under detention provided that the form and conditions of such labor are prescribed by law, services required from citizens during a state of emergency, and physical or intellectual work necessitated by the needs of the country as a civic obligation shall not be considered as forced labor.”

Minimum Age

Turkish Labor Law sets the minimum age at which a child can be employed as well as the conditions under which children can work (Article 71, Chapter 4). The minimum employment age is 15, but in certain cases of vocational training, mild work may be allowed for 14-year-olds. According to Turkish Labor Law, Article 73, boys under the age of 18 and women irrespective of their age must not be employed on underground or underwater work like in mines, cable-laying and the construction of sewers and tunnels.

Sexual Harassment in the Workplace

Sexual Harassment is not assessed within the scope of the Labor Law. The list of the legislations, policies, plans and international conventions relevant to sexual harassment in the workplace are provided in Table 5.

Table 5: Sexual Harassment Information

| Laws/Policies/Conventions | Scope |
|--|---|
| The Constitution | Articles 41, 66 (2001), Articles 10, 90 (2004), Article 10 (2010). |
| Turkish Civil Code | The law upholds equality between women and men, puts an end to sexual discrimination. |
| The Law on the Protection of Family and Prevention of Violence against Women | The law includes specific arrangements to end violence against women. |
| Labor Law | Any discrimination with respect to basic civil rights, including sex, could not be made in employer-employee relations. |
| Restructuring Specific Debts and Amending the Social Insurance Law | The wages and premiums of the times worked shall be paid by the employer. |

| Laws/Policies/Conventions | Scope |
|---|---|
| Turkish Penal Code | The law includes modern arrangements with respect to gender equality and domestic violence against women. |
| Civil Servants Law | The personal rights of female employees and parents. |
| The Revenue and Corporate Taxes Law | The income yielded by women by selling the home-made products in the charity sales, festivals, and fairs and at places determined temporarily by the state institution and organizations was deemed exempt of tax. |
| Laws on Project Support to Investments | Private crèches and day-care centers are exempted from the revenue and corporate taxes for five fiscal/taxation periods. |
| The Law Amending the Republic of Turkey Retirement Fund of Civil Servants | Female farmers engaged in agricultural activities on their own behaves should be the head of family in order to be covered by the insurance. |
| The Prime Ministry Circular No. 2004/7 on "Acting in Accordance with the Principle of Equality in Staff Recruitment" | The Circular aimed at preventing sexual discrimination in personnel recruitment. |
| The Prime Ministry Circular No. 2010/14 on "Increasing Women's Employment and Promotion of Equality in Opportunities" | The Circular aimed at increasing women employment and to implement equal pay for equal work principle for strengthening the socio-economic positions of women |
| The Rural Development Investments Support Program by the Ministry of Agriculture and Forestry | In the parts of investment projects with 50% grant, in case that the project owner is a female farmer, extra 2 points are added to the points table according to the pre-assessment criteria, and extra 4 points are also added if the woman is a member of agricultural cooperative or union. In case that female farmers engaged in agriculture apply for machinery equipment purchases within scope of the Project, they can benefit from 50% grant for 35 types of machines. |
| Social Insurance and Universal Health Insurance Law (No. 5510) | Those in insured employment in home-based services shall be considered in the relevant proceedings depending on whether they are recruited less or more than 10 days a month. Those recruited less than 10 days a month shall be insured against occupational accidents and diseases, their premiums shall be covered by the employers and the insured shall be entitled to pay their long-term and general health insurance premiums until the end of the following month, if they choose to do so. On the other hand, the premiums of those recruited for ten days and longer a month shall be paid by their employers in scope of easy employer practices. |
| Policies and Plans | |
| The National Action Plan on Combating Violence against Women (2016-2020) | The contribution and participation of institutions and organizations taking into consideration the relevant international conventions being a party, in particular the Istanbul Convention and provisions of national legislation, |

| Laws/Policies/Conventions | Scope |
|--|---|
| | relevant research and evaluation reports and recent social needs and developments. |
| The Strategy Paper and Action Plan on Combating Early and Forced Marriages (2018-2023) | The main goal of which is to decrease the early and forced marriages and empower the girls. |
| International Conventions | |
| The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) | CEDAW was submitted for signature on 1st March 1980, after the Second World Conference on Women. The convention adopted by Turkey in 1985 entered into effect on 19th January 1986. |

In Turkey, important legal regulations have been enacted on equality of men and women, protecting, and promoting human rights of women and combating violence against women. However, effective implementation of legal regulations on combating violence against women, provision of protection, treatment, and rehabilitation services not only to victims of violence but also to perpetrators and promotion of social awareness of and sensitivity to the issue are as vital as the availability of such legal regulations.

In this framework, the efforts of Ministry of Family and Social Services have made for combating violence against women with a belief that violence against women is intolerable have been maintained with a wide scale, dedicated and comprehensive cooperation. Since the implementation period of “The National Action Plan on Combating Violence Against Women (2012-2015)”, one of the concrete examples of this commitment and cooperation, ended in the end of 2015, “The National Action Plan on Combating Violence Against Women (2016-2020)” has been prepared with the participation and contributions of relevant governmental agencies and organizations, non-governmental organizations and the women’s studies research centers of various universities, taking into consideration the relevant international conventions, in particular the Istanbul Convention and provisions of national legislation, follow-up and evaluation reports on the National Action Plan on Combating Violence Against Women (2012-2015), results of the related studies conducted by the General Directorate on the Status of Women, outputs of the Parliamentary Investigation Committee on the Motives of Violence Against Women and Due Measures and recent social needs and developments.

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

5.1. Terms and Conditions of Occupational Health and Safety Legislation

Occupational health and safety issues are defined by Occupational Health and Safety (OHS) Law (No. 6331) and respective regulations linked to the law.

The OHS Law (No. 6331) aims to regulate the duties, authority, responsibility, rights and obligations of employers and workers in order to ensure occupational health and safety at workplaces and to improve existing health and safety conditions. The Law applies to all works and workplaces in both public and private sector, employers of these workplaces and their representatives, all workers including apprentices and interns regardless of their field of activity. However, there are several activities and persons which the Law is not applicable to. These are activities of the Turkish Armed Forces, the Police Department and the Undersecretary of National Intelligence Organization, except those employed in workplaces such as factories, maintenance centers, sewing workshops etc., intervention activities of disaster and emergency units, domestic services, persons producing goods and services in their own name and on their own account without employing workers and prison workshop, training, security and vocational course activities within the framework of improvements carried out throughout the enforcement services for convicts and inmates.

5.1.1. OHS Services

According to Article 6 of OHS Law:

- In order to provide occupational health and safety services including activities related to the protection and prevention of occupational risks, the employer shall:
 - Designate workers as occupational safety specialist, occupational physician, and other health staff. In case there is lack of personnel in the undertaking competent enough to be designated, the employer shall enlist a joint health and safety unit to provide these services partially or fully. Provided that the employer has the required qualifications and documents, these services can be offered by the employer considering the hazard class and the number of workers.
 - Meet the need for space and time to help designated people or organizations fulfil their duties.
 - Ensure cooperation and coordination among all people and bodies responsible for providing health and safety services at workplaces
 - Implement measures related to occupational health and safety and that are in accordance with the legislation and notified in writing by the designated persons or organizations providing services
 - Inform designated persons, external services consulted and other workers and their employers from any outside enterprise or undertaking engaged in work in his undertaking or enterprise receive adequate information as regards the factors known to affect, or suspected of affecting, the safety and health of workers.
- Public bodies and organizations as defined in Public Procurement Law no. 4734 dated 4/1/2002 may get occupational health and safety services either directly from circulating capital enterprises operating under the Ministry of Health or as defined in law no. 4734.
- It is not obligatory to hire other health care staff in enterprises where there is a full-time occupational physician.

5.1.2. Risk Assessment, Control, Measurement and Research

Risk analysis will execute in accordance with the Regulation Regarding Risk Analysis for the Occupational Health and Safety and OHS Law (No. 6331) Article 10.

- The employer shall conduct an assessment of risks to health and safety of workers or get one carried out, taking account the following points:
 - a) The situation of workers who might be affected by certain risks.
 - b) Choice of work equipment, the chemical substances or preparations used.
 - c) Workplace organization and housekeeping.
 - d) The situation of female workers and other workers such as young workers, older workers, disabled, pregnant or breastfeeding workers who need specific policies.
- The employer shall identify the occupational health and safety measures to be taken as well as the protective gear or equipment to be used a consequence of the risk assessment.
- Measures to be taken for the safety and health protection of workers and the working and production methods implemented by the employer must assure an improvement in the level of protection afforded to workers with regard to safety and health and be practicable at all hierarchical level within the undertaking and/or enterprise.
- The employer shall ensure that controls, measurements, examinations, and research are carried out to identify the risks which are linked to the working environment and to which the workers are exposed.

5.1.3. Emergency Response

Emergency response will execute according to the Regulation on Emergencies in Workplaces and Article 11 of OHS Law (No. 6331).

The employer shall:

- assess the foreseeable emergency situations which could arise and identify those that might possibly and potentially affect workers and work environment taking into account the work environment, substances used, equipment and environmental conditions present in the workplace and take measures to prevent and limit adverse effects of emergency situations.
- conduct measurement and assessments to afford protection against adverse effects of emergency situations and prepare emergency plans.
- designate a sufficient number of persons adequately equipped in prevention, protection, evacuation, firefighting, first aid and other related issues taking into account the size and specific hazards of the undertaking, nature of the activities, number of employees and other persons present in the enterprise. The number of such workers, their training and equipment available to them shall be adequate and the employer shall arrange emergency drills and trainings and make sure that the rescue teams are always available to respond.
- arrange any necessary contacts with external services, particularly as regards first aid, emergency medical care, rescue work and firefighting.

5.1.4. Right to Abstain from Work

This issue will be executed in line with the Article of the OHS Law (No. 6331).

Workers exposed to serious and imminent danger shall file an application to the OHS committee or the employer in the absence of such a committee requesting an identification of the present hazard and measures for emergency intervention. The OHS committee shall convene without delay and the employer shall make a decision immediately and write this decision down. The decision shall be communicated to the worker and workers' representative in writing.

- In the event that the committee or the employer takes a decision that is supportive of the request made by the worker, the worker may abstain from work until necessary measures are put into practice. The worker shall be entitled to payment during this period of abstention from work and his/her rights arising under the employment contract and other laws shall be reserved.
- In the event of serious, imminent, and unavoidable danger, workers shall leave their workstation or dangerous area and proceed to a place safety without any necessity to comply with the requirements in the first paragraph. Workers may not be placed at any disadvantage because of their action.
- Where the necessary measures are not taken despite the requests by workers, workers under labor contract might terminate their employment contract in accordance with the provisions of the law applicable to them. As for the workers under collective bargaining agreement, the abstention period as defined in this article shall be deemed as actual work time.
- In compliance with the Article 25 of OHS Law, the provisions of this article shall not apply in the event of cease of work in the enterprise.

5.1.5. Recording and Notification of Occupational Accidents and Diseases

Occupational accidents and diseases will execute according to OHS Law (No. 6331) Article 14.

- The employer shall:
 - keep a list of all occupational accidents and diseases suffered by his workers and draw up reports after required studies are carried out.
 - investigate and draw up reports on incidents that might potentially harm the workers, workplace or work equipment or have damaged the workplace or equipment despite not resulting in injury or death.
- The employer shall notify the Social Security Institution of the following situations within a prescribed time as follows:
 - within three workdays of the date of the accident.
 - within three workdays after receiving the notification of an occupational disease from health care providers or occupational physicians.
- Occupational physicians or health care providers shall refer workers who have been pre-diagnosed with an occupational disease to health care providers authorized by the Social Security Institution.
- Occupational accidents referred to health care providers shall be notified to the Social Security Institution
- Within ten days at most and authorized health care providers shall notify the Social Security Institution of the occupational diseases within the same period of time.
- The procedures and principles as regard to this article shall be defined by the Ministry following the receipt of approval from the Ministry of Health.

5.1.6. Health Surveillance

Worker' s health surveillances will be made according to OHS Law (No. 6331) and Regulation on Duty, Authority, Responsibility and Training of Workplace Doctor and Other Health Personnel.

- The employer shall:
 - ensure that workers receive health surveillance appropriate to the health and safety risks they incur at work.
 - Health examination of workers is required under the following situations:
 - Pre-assignment.

- Job changes after the assignment.
 - In case of return to work following repetitive absence from work due to occupational accidents, occupational diseases, or health problems upon request.
 - At regular intervals recommended by the Ministry in the course of employment taking into account the workers, the nature of work and hazard class of the enterprise.
- Workers to be employed in enterprises classified as hazardous and very hazardous shall receive a medical report before employment.
 - Medical reports required to be received as per this Law shall be obtained from workplace doctor working in workplace health and safety unit or joint health and safety unit. Any objection to the medical reports shall be filed to an adjudicator hospital assigned by the Ministry of Health. The decision made by the hospital shall constitute the definitive judgment.
 - The employer shall cover all expenses arising from health surveillance and any additional expense related to this surveillance. The health surveillance may in no circumstances bring financial burden to workers.
 - Health data of workers undergoing a medical examination shall be kept confidential in order to ensure protection of individual privacy and prestige.

5.1.7. Training

Training of all contracted workers will be performed according to Article 17 of the OHS Law (No. 6331) and Regulation on the Procedures and Principles of Employees' Occupational Health and Safety Training.

- The employer shall ensure that each worker receives safety and health training. This training shall be provided on recruitment, in the event of a transfer or a change of job, in the event of a change in equipment or introduction of any new technology. The training shall be adapted to take account of new or changed risks and repeated periodically if necessary.
- Workers' representatives shall be entitled to appropriate training.
- Workers failing to present documents to prove that they have received vocational training on their job might not be employed in jobs classified as hazardous and very hazardous which require vocational training.
- Workers who have had occupational accident or disease shall receive additional training on reasons for the accident or disease, ways to protect themselves and safe working methods. Furthermore, workers who are away from work for any reason for more than six months shall receive refresher training before return to work.
- Workers from outside undertakings and/or enterprises might not start to be employed in jobs classified as hazardous and very hazardous unless they can present documents to prove that they have received appropriate instructions regarding health and safety risks.
- The employer who is the party to temporary employment relationship shall ensure that the worker receives training on health and safety risks.
- Trainings mentioned in this article may in no circumstances bring financial burden to workers. Time spent on trainings shall be deemed as actual work time. In case the time allocated for trainings exceeds weekly working hours, hours worked in excess of weekly working hours shall be considered as overtime.

5.1.8. Workers' Representative

The concept of “Workers’ representative” is defined in the Article 20 of the OHS Law. Duties and responsibilities of the workers’ representative are further explained in the Notification Regarding the Qualifications of the Employee Representative and the Procedure and Principles of Selection.

- In the event that no person might be elected or chosen to represent workers, the employer shall designate a workers' representative considering the risks present at work and the number of workers with special attention to balanced participation of workers. The number of representatives shall be identified in the following way:
 - One representative for enterprises between 2 and 50 workers.
 - Two representatives for enterprises between 51 and 100 workers.
 - Three representatives for enterprises between 100 one and 500 workers.
 - Four representatives for enterprises between 500 one and 1000 workers.
 - Five representatives for enterprises between 1001 and 2000 workers.
 - Six representatives for enterprises between 2001 and more workers.
- Where there is more than one worker’s representative, the chief representative shall be elected among the other workers' representative.
- Workers' representatives shall have the right to ask the employer to take appropriate measures and to submit proposals to him to that end to mitigate hazards for workers and/or to remove sources of danger.
- Workers' representatives may not be placed at a disadvantage because of their respective activities and the employer shall provide them with the necessary means to enable such representatives to exercise their rights and functions.
- Where there is an authorized trade union represented in the enterprise, the trade union representative shall act as workers' representative.

5.1.9. Occupational Health and Safety Committee

Occupational Health and Safety Committee will be constituted according to OHS Law (No. 6331) Article 22 and Regulation on Occupational Health and Safety Committees determines the principles.

- The employer shall set up an occupational health and safety committee in enterprises where a minimum of fifty employees are employed and permanent work is performed for more than six months. Employers are under the obligation to enforce the decisions of the occupational health and safety committees taken in accordance with the legislation on occupational health and safety.
- In the event that main employer – sub contractor relation exceeds six months:
 - Where the main contractor and sub-contractor have set up separate committees, the contractor shall ensure cooperation in the enforcement of decisions and maintenance of activities.
 - Where the contractor has set up a committee, the sub-contractor shall appoint by proxy an authorized representative to facilitate coordination.
 - The contractor who is not required to set up a committee shall appoint by proxy an authorized member to be represented in the committee set up by the sub-contractor to ensure cooperation and coordination.
 - Where the contractor is not supposed to set up a committee and the sub-contractor employs more than fifty workers, the contractor and sub-contractor shall set up a joint committee provided that the cooperation is ensured by the contractor.

- Where there is more than one employer in the same workplace and these employers set up more than one committee, these employers shall inform each other of the decisions of the committees which might affect one another.

5.1.10. Brief Overview of Occupational Health and Safety Legislation

Project workers including direct, contracted, and primary supply workers of the project are subject to this law. The law stipulates and enforces employers to provide employees with a safe and healthy working environment and to inform workers of the potential risks their jobs may present to their health and safety. The overview above provides key aspects of legislation which relates to the items set out in ESS2.

5.2. The World Bank Environmental and Social Standards

The World Bank's stipulations related to labor are outlined in its Environmental and Social Standard 2 (ESS2) on Labor and Working Conditions. This helps the Borrowers in promoting sound worker management relationships and enhances the development benefits of a project by treating workers in the project fairly and providing safe and healthy working conditions. Key objectives of the ESS2 are to:

- promote safety and health at work,
- promote the fair treatment, non-discrimination, and equal opportunity of project workers,
- protect project workers, including vulnerable workers such as women, persons with disabilities, children (working age in accordance with this ESS) and migrant workers, contracted workers, community workers and primary supply workers,
- prevent the use of all forms of forced labor and child labor,
- support the principles of freedom of association and collective bargaining of project workers in a manner consistent with national law, and provide project workers with accessible means to raise workplace concerns.

ESS2 applies to project workers including fulltime, part-time, temporary, seasonal, and migrant workers. Where government civil servants are working in connection with the project, whether full-time or parttime, they will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement, unless there has been an effective legal transfer of their employment or engagement to the project. ESS2 will not apply to government civil servants, except for child/forced labor provisions and OHS requirements.

The Borrower is responsible for developing and implementing written labor management procedures applicable to the project. These procedures set out the way in which project workers will be managed, in accordance with the requirements of national law and this ESS. The procedures will address the way in which this ESS will apply to different categories of project workers including direct workers, and the way in which the Borrower will require third parties to manage their workers.

Project workers will be provided with information and documentation that is clear and understandable regarding their terms and conditions of employment. The information and documentation will set out their rights under national labor and employment law (which will include any applicable collective agreements), including their rights related to hours of work, wages, overtime, compensation, and benefits, as well as those arising from the requirements of ESS2. This information and documentation will be provided at the beginning of the working relationship and when any material changes to the terms or conditions of employment occur.

The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working

conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices.

5.3. Policy Gaps

Comparison of key labor and OHS related WB requirements with the national legal frame is elaborated below given Table 6.

One of the gaps between the national legal frame and ESS2 is that there is no specific requirement related to grievance mechanism that allows workers to communicate their complaints. The grievance mechanism to be established within the scope of the Project is particularly significant in closing this gap.

Table 6: Policy Gaps

| ESS2 Issues | Major WB requirements | National Legislation |
|---|--|---|
| A. Working conditions and management of labor relations | <ul style="list-style-type: none"> • Written labor management procedures • Terms and conditions of employment • Nondiscrimination and equal opportunity • Worker's organizations • Elaborate Labor Management Plans including Contractor's ESMP | <p>All requirements exist in GT legislation except:</p> <ul style="list-style-type: none"> • No provision for Labor Management Plans for specific projects. |
| B. Protecting the work force | <ul style="list-style-type: none"> • Child labor prohibition • Forced labor prohibition | <p>No gaps</p> <ul style="list-style-type: none"> • It is prohibited to employ children below the age of 15. • Turkish Labor Law does not cover forced labor issues. However, the Constitution of the Republic of Turkey, Art. 18 prohibits forced labor. |
| C. Grievance mechanism | <p>GM should be in place for direct and contracted workers</p> | <ul style="list-style-type: none"> • No specific GM process for employees working with individual employment contracts. • Grievance registration and follow-up procedures are defined in the Unions and Collective Bargaining Agreement Law and Public Officials Unions and Collective Contract Law No. 4688. |
| D. Occupational Health and Safe | <ul style="list-style-type: none"> • Detailed Procedure required for every project. • Requirements to protect workers, train workers, document incidents, emergency preparation, addressing issues, and • Monitor OHS performance | <ul style="list-style-type: none"> • No detailed procedure specific to every project. • Consistent on requirements to protect workers, train workers, document incidents, have emergency preparedness plan. • OHS performance is monitoring by ISG Katip system. |

| | | |
|---|--|--|
| <p>E. Category of workers</p> | <p>Categorizes the workers under four categories; direct, contracted, supplier, community workers.</p> | <p>Categories of workers are defined in Labor Law (No. 4857):</p> <ul style="list-style-type: none"> • Fixed Term Contract –Article 12 • Indefinite Term Contract - Article 11, 63 • Part-Time Contract- Article 13 • On-Call Working Contract - Article 14 • Team Contract- Article 16 |
| <p>F. Minimum age of workers</p> | <ul style="list-style-type: none"> • Minimum age for employment is 14, • A child between 14-18 may be employed or engaged only in certain conditions | <p>The minimum employment age is 15, but in certain cases of vocational training, mild work may be allowed for 14-year-olds.</p> |

6. Assessment of Key Potential Labor Risks

6.1. Occupational Health and Safety Risks

There will be various activities during the implementation of the project as given in Table 1. The Occupational health and safety (OHS) risks of these activities 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 operation phases
 - Component 1: Soil surveys will be carried out nationwide. The OHS related risks might be the traffic accidents or injuries that might happen while carrying out the soil surveys..
 - 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 3.1: 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 3.2: Promoting the adoption of CSA technologies/practices across relevant crops (also applicable to Subcomponent 3.1)
 - Physical hazards
 - Operational and workplace hazards (Slips, trips, and falls (inadequate workplace) resulting in sprains, strains, and fractures; ergonomics hazards from manual handling, lifting weights, or repetitive movements; sharp and moving objects in the workplace; and over-exposure to noise, vibration, and extreme or adverse weather conditions).
 - Machinery and vehicles (worker transportation, farm tractors, harvesting machinery, and a variety of other machines used on farms)
 - Confined and restricted space entry ((e.g., processing bins and silos, product storage bins, water tanks, inadequately ventilated buildings, areas treated with pesticides, etc.)
 - Exposure to organic dust including particles from grain, fungi, and bacteria, as well as inorganic material.
 - Risk of fire and explosion from the combustion of stored oil or crop residues
 - Biological hazards due to contact with venomous animals, such as stinging insects, spiders, scorpions, snakes, disease vectors (e.g., mosquitoes, ticks), and with certain wild mammals (e.g., wild pigs).
 - Chemical hazards due to exposures to pesticides.
- For Subcomponent 3.3: 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.

Other general OHS risks to workers of the proposed Project will be office-based OHS issues.

The subprojects 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.

6.2. COVID-19

The employers will apply both 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 and the guidelines of World Health Organization (WHO), which are regularly updated, 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.

6.3. 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 1 of this LMP and adhere to the principles below.

During 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.

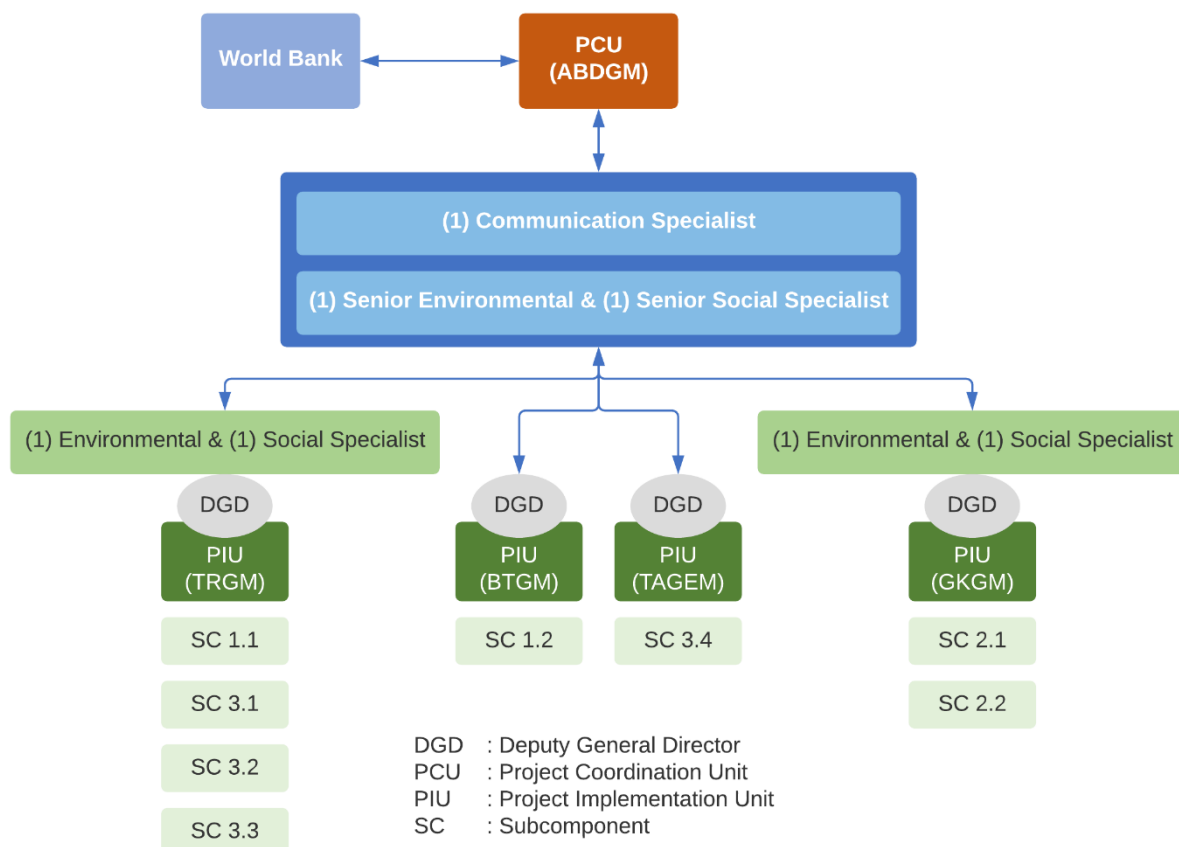
Mandatory trainings will be given on codes of ethics/conduct and harassment and misconduct issues for workers.

7. Responsible Staff

In total there will be three environmental specialists and three social specialists in the proposed Project and one communication specialist. Of the six Environmental and Social (E&S) specialists two would be lead (one social and one environmental), responsible for the overall compliance of the proposed Project with the ESF requirements, the E&S documents prepared for the proposed Project and will provide direct support to low risky activities developed by TAGEM and BTGM. Two specialists (one social and one environmental) will be hired under the TRGM-PIU and other two (one social and one environmental) under GKGM-PIU. However, all specialists hired within the scope of the Project will be able to provide support across subcomponents as needed. All of the specialists will be recruited at the beginning of the proposed Project and will remain their positions throughout the project implementation.

The organizational structure of the ESF implementation is given in Figure 2.

Figure 2: ESF main responsibilities at PCU & PIUs



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

Project Coordinating Unit (PCU): PCU will be the main coordinating body and will be staffed to carry the technical capacity that will technically support other management units of the project. PCU will;

- Undertake the overall implementation of this LMP,
- Engage and manage contractors/subcontractors in accordance with this LMP and the applicable procurement document,

- Monitor that contractors/subcontractor are meeting obligations towards contracted workers as included in the Contractor's LM Plan (LM Plan), ESMP and bidding document; and ensure that they are in line with ESS2 and national labor and OHS laws,
- Maintain records of recruitment and employment process of direct workers,
- Monitor employment process of contracted workers to ensure it is carried out in accordance with this labor management procedure and national labor law,
- Monitor the potential risks of child labor, forced labor and serious safety issues in relation to primary supply workers,
- Monitor training of relevant project workers,
- Ensure that the GM for project workers is established and operated effectively and all workers are informed of it,
- Monitor and report on the Worker's GM,
- Monitor implementation of the workers Code of Conduct,
- Monitor that OHS standards are met at all workplaces (including Contractors'/subcontractors) in line with national occupational health and safety legislation, ESS2 requirements, Occupational Health and Safety Plan, and WHO and WB guidelines on COVID-19 prevention,
- Monitor training of the project workers on OHS, SEA/SH prevention and any other required trainings,
- Establish and implement a procedure for documenting specific incidents such as project related occupational injuries, illnesses, and lost time accidents. Maintains such records and requires all third parties and primary suppliers to maintain them. Such records will form an input into the regular review of OHS performance and working conditions,
- In instances of severe, fatal, and mass accidents, inform the law enforcement bodies, Labor Inspectorate and PIUs, and

Project Implementation Units (PIU): The PIUs at the Central Organization of MoAF, under the GDs of TRGM, BTGM, GKGM and TAGEM will be responsible for the execution of project activities under their respective subcomponents in coordination with the related Provincial Organizations. They will be responsible for the implementation of this LMP within the scope of the subcomponents they are responsible for. The focal point of the PIU will;

- oversee the LMP activities under their respective subcomponents,
- ensure that contractors prepare their Contractor's LM Plan is in line with this LMP and Contractor's ESMP before the commencement of any works on site,
- monitor implementation of the LM Plans,
- inform PCU in instances of work accidents, and
- prepare reports about LMP activities under its respective sub-components and submit to PCU.

Contractor firms will be responsible for preparing and implementing subproject specific LM Plans and OHS Plans. They will be responsible for contracting and managing their labor force with respect to the terms and conditions in the LM Plan. They will be responsible for the following in addition to the legislative requirements:

- Employ or appoint qualified social, labor, and occupational health and safety experts to implement project specific labor management procedure, occupational health, and safety plans, and to manage sub-contractors' performance,
- Prepare and adopt LM Plan and OHS plan which will apply to contracted and subcontracted workers. These procedures and plans will be submitted to respective PIUs and then to PCU for review and approval before the contractors mobilize for the preconstruction phase,

- Supervise its subcontractors' compliance with the LM Plans and OHS plans,
- Maintain records of recruitment and employment process of contracted workers,
- Monitor employment process of sub-contracted workers to ensure it is carried out in accordance with this labor management procedure and national labor law,
- Clearly communicate job description and employment conditions to contracted workers,
- Develop, and implement workers' grievance mechanism and address the grievance received from the contracted and sub-contracted workers,
- Have a system for regular review and reporting on labor, and OHS performance,
- Deliver regular work induction trainings including but not limited to OHS, HSE, social induction, SEA/SH prevention training to employees,
- Ensure that all contractors and sub-contractor workers understand and sign the Code of Conduct prior to the commencement of works,
- Establish and implement a procedure for documenting specific incidents such as project related occupational injuries, illnesses, and lost time accidents. Maintain such records and require all third parties and primary suppliers to maintain them. Such records will form an input into the regular review of OHS performance and working conditions,
- In instances of severe, fatal, and mass accidents, inform the law enforcement bodies, Labor Inspectorate and respective PIU,
- For COVID-19:
 - Implement training of workers on the latest WHO advice and recommendations on the COVID-19 infection prevention,
 - Raise awareness and ensure that all workers participate in trainings in mitigating the spread of COVID-19,
 - Carry out health checks of workers to prevent COVID-19,
 - Monitor, supervise, and report on health and safety issues relating to COVID-19 (COVID-19 focal point), and
 - Ensure that workers are provided with PPE to prevent COVID-19 (face covers, gloves, sanitizers) and that hand washing facilities are available.

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 WB ESF, 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.

8.2. Code of Conduct

The contractors will adopt and implement the Code of Conduct (CoC), which reflects the company's mission, core values and overall working culture and will be included in the WB standard bidding documents. The Code of Conduct will also include measures to address SEA/SH issues.

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 1 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 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 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

An Occupational Health and Safety (OHS) Plan will be prepared by contractors and sub-contractors in accordance with OHS legislation during the execution of the construction operations. Contents of OHS Plan to be prepared during the construction phase is included in Annex 2.

Audits will be made on the site through regular visits of OHS teams of PIUs and third-party auditors. All project workers will be trained and informed about potential OHS risks before the start of works. A worker who does not take the required training will not be allowed to work at the Project.

Within the scope of the OHS Law, OHS specialist, workplace doctor and other health personnel will be appointed within the legal period. Compulsory documents such as risk analysis, emergency response plans, and trainings will be prepared and revised according to OHS Law. Site specific plans and procedures will be created and implemented to minimize and mitigate OHS risks and ensure the health and safety of the employees related to the work performed.

Each worker will receive safety and health trainings for which duration and subject are specified in the legislation. Trainings will be provided at the stage of recruitment, in the event of a transfer or a change of job, in the event of a change in equipment or introduction of any new technology. Trainings will be adapted to take account of new or changed risks and repeated periodically if necessary.

Social facilities and accommodation conditions will comply with the legislation and international standards. All contractor firms will be required to provide adequate PPE to workers free of charge.

Given the maximum engagement of local people in site works, need for accommodation will be low. As necessary, construction workers will stay at small construction camp sites to be established by the contractor firms. The accommodation standards shall be aligned with Turkish labor and OHS regulations, World Bank ESS2 requirements and Workers Accommodation Guideline of International Finance Corporation/European Bank for Reconstruction and Development (IFC/EBRD).

9.1. 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. However, within the scope of the Project, 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 48 hours after the occurrence.

The contractor will submit 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.

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 also include the summary of accidents and diseases in its monthly reports throughout the Project according to the codes indicated in Table 7.

Table 7: 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 the OHS related incident and the PIU will inform PCU and PCU will inform the World Bank about the incident in 48 hours after the incident.

PCU will also send an incident investigation report together with the corrective action plan in 30 business days to the World Bank.

9.2. 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 OHS 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 and improved as necessary. 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 pro-active 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).

10. Workers' Grievance Mechanism

In addition to project's GM for its internal and external stakeholders, the ESS 2 requires establishment of a Workers' Grievance Mechanism (WGM) for the project workers. The project workers will use the WGM to convey their concerns or suggestions regarding their working conditions and workplace.

The WGM will be established both by the PCU and the contractors who will perform construction work within the scope of the project. The WGM established by PCU will be used by all project workers, including the staff of PCU and PIU. The Contractor's WGMs will be monitored by the Supervision Consultants and will be monthly reported to the PIU through their progress reports. The process will also be monitored by the PIUs and the GM Focal Point in MoAF. The Contractors may seek advice and support from the Supervision Consultant (SC) to address grievances submitted in language other than Turkish.

The workers will be informed 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. Besides, the WGM will also be described in staff induction trainings, which will be provided to all project workers. The mechanism will be based on the following principles:

The following principles will be taken into account in the WGM to be established.

- **Awareness.** WGM will be introduced to Project workers (direct and contracted) in the workplace through the staff induction trainings and other means of communication tools and engagement methods. This introduction will describe the grievance procedure including the steps to be followed for submitting their grievances and requests, intake channels to be used, etc.
- **Accessibility.** The WGM will be set up in a way that workers can access easily.
- **Anonymity.** The workers will be able allowed to submit their requests anonymously and will be treated equally as other grievances, whose origin is known.
- **Follow up.** The applications received through different intake channels will be subject to a standardized GM Operation Procedure to be developed by the PCU.
- **Confidentiality.** The identity of the complainants will not be disclosed without their consent; and their contact details will not be shared with the third parties.
- **Archiving.** All complaints submitted (written, oral, etc.) through different intake channels together with their supporting documents, the responds provided will be recorded and will not be used other than project implementation purposes and shared with the third parties.

The WGM will allow workers to submit their grievances through different intake channels such as webpage, suggestion/complaint boxes, etc.

The PCU will assign one of the social experts for the overall supervision of the GM including recording complaints, conveying them to relevant units for resolution, and following the timely provision and the quality of the resolutions. The suggestion/complaint boxes in the workplaces will be opened weekly and shared with the PCU. The GM focal points of the GDs, provincial directorates/organizations and the contractors. The workers GM will not prevent workers to use conciliation procedure (Law on Labor Courts, (No. 7036) published in the Official Gazette dated 25.10.2017- Article 3) provided in Turkish Labor Legislation.

10.1. Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH)

Although the risk from project activities and in Turkish context is low, grievance mechanism for workers shall include handling disclosures of sexual exploitation and abuse (SEA) and sexual harassment (SH). A SEA/SH referral pathway will be established and updated in line with existing procedures of the country. The WGM will also be used for addressing SEA/SH-related issues and will have in place mechanisms for confidential reporting with safe and ethical documenting of SEA/SH issues. Further, the WGM will also have in place processes to immediately notify both the PCU and the World Bank of any SEA/SH complaints, with the consent of the survivor.

10.2. World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>.

Project affected communities or individuals can also raise their grievances to the World Bank Independent Inspection Panel (IIP). This panel determines whether the person or communities that made the complaint were harmed because of the breach of one or more of the WB's performance criteria. The panel can directly convey its concerns about the received complaints to the WB. At this stage, WB would have an opportunity to respond to the complaints.

11. Contractor Management

Most of the activities of the proposed Project will be contracted. The contracts will include provisions related to labor and OHS 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, Provincial Organizations (in case of agricultural activities), Supervision Contractors (in case of construction activities) 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.

References

1. 2017. "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. Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works
6. 2007. "Environmental, Health, and Safety General Guidelines." IFC.

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.

Annex 2: Indicative Outline of Occupational Health and Safety Plan

1 AIM

2 SCOPE

3 LEGISLATION REQUIREMENT

4 RESPONSIBILITIES

5 APPLICATION

5.1 Duties of the Contractor Management

5.2 Duties of HS Expert

5.3 Duties of Workplace Doctor

5.4 Duties of Worker Representative

5.5 Duties of Healthcare Personnel

5.6 Routine Site Visits of the HS Expert

5.7 Health Scan and Examination

5.8 Routine Site Visits of the Workplace Doctor and Health Personnel

5.9 Risk Analysis Works

5.10 Training

5.10.1 Educator and Training Institutions

5.10.2 Basic Training Subjects and Its Contents

5.10.3 Training Program Registrations

5.10.4 Determination of the Training Activities and its Evaluation

5.10.5 Planning the Trainings

5.10.6 Toolbox Training

5.11 Personal Protective Equipment

5.11.1 Personal Protector Equipment Standards

5.11.2 Nonconformity Management

5.12 Determination of Manners and Behavior that are Against the Rules of Occupational Health and Safety by the Personnel

5.13 Preparation of Emergency Situations

5.13.1 Planning of Drills

5.13.2 Recording the Drills

5.13.3 Determination of the Emergency Response Teams and Announcing the Emergency Response Team

- 5.13.4 Community Health, Safety and Security
- 5.14 Personnel Communication
- 5.15 Acceptance of Visitors
- 5.16 Controls of the Used Devices/Equipment
- 5.17 Equipment with Pressure
- 5.18 Lifting Devices/Equipment
- 5.19 Fire Warning Systems and Fire Extinguishers
 - 5.19.1 Fire Extinguishers
 - 5.19.2 Fire Extinguisher Types and Attributes
 - 5.19.3 Warning Systems
- 5.20 Fixed Devices
- 5.21 Mobile Electric Devices
- 5.22 Electric System Controls
 - 5.22.1 Electric Board/Table Control
 - 5.22.2 Grounding Systems
 - 5.22.3 Electric System General Examination
 - 5.22.4 Generator Controls
- 5.23 Environment and Personal Exposure Measurements
 - 5.23.1 Determination of the Site Illumination Levels
 - 5.23.2 Noise Level Measurement
 - 5.23.3 Heat/Moisture Measurements
 - 5.23.4 Air Quality Measurement
 - 5.23.5 Personal Exposure Measurement
 - 5.23.6 Site Work Applicability Controls
- 5.24 Temporary Assignment
- 5.25 Personnel Applicability Controls
- 5.26 Warning Plates and Labels that will be Placed in the Sites
- 5.27 Occupational Accident
- 5.28 Traffic and Road Safety
- 5.29 Work Instructions
 - 5.29.1 Working at Height

- 5.29.2 Electric Works
- 5.29.3 Hot Works
- 5.29.4 Confined Spaces
- 5.29.5 Working in or Near Water
- 5.29.6 Lifting Operations
- 5.29.7 Safety of Hazardous Materials
- 5.29.8 Excavation-Filling Works

5.30 Locking Tagging Operation

5.31 Permit to Work

5.32 Reward Penalty System

5.33 Social Facilities

5.34 Alcohol and Drug Usage

5.35 Work Stoppage

5.36 Right to Avoid Working

5.37 Child Labor

5.38 Disease Prevention

- 5.38.1 Communicable Diseases

- 5.38.2 Potable and Tap Water

- 5.38.3 Vector-Borne Diseases

- 5.38.4 Covid-19 Measurements

Annex 3: Grievance Form

| GRIEVANCE FORM | | | |
|---|--|------------------|--|
| Reference No <i>(to be filled by institution)</i> | | | |
| <p>Personal Information <i>Although giving name and address is not compulsory, it should be kept in mind that during the feedback process regarding the grievance some problems may occur due to lack of information Personal information will be used to identify if there exist special circumstances with respect to your grievance and it will be stored and processed according to Personal Data Protection Law No. 6698. You can choose to fill partly or not to fill</i></p> | | | |
| Identity Number | | Full Name | |
| Province | | District | |
| Neighborhood/Village | | Locality | |
| <p>Preferred way of communication,(Please provide your contact details: mail address, e-mail address, telephone number, etc. in you would like to be informed about the resolution process, actions to be taken)</p> | | | |
| Grievance | | | |
| | | | |
| Your proposal for solution (if any) | | | |
| | | | |
| Signature | | Date | |

Annex 4: Grievance Closeout Form

| GRIEVANCE CLOSEOUT FORM | |
|--|---------------------------------------|
| Grievance closeout number: | |
| Reference No of the Grievance | |
| Define immediate action required: | |
| Define long term action required (if necessary): | |
| Compensation Required? | [] YES [] NO |
| CONTROL OF THE REMEDIATE ACTION AND THE DECISION | |
| Stages of the Remediate Action | Deadline and Responsible Institutions |
| 1. | |
| 2. | |
| 3. | |
| 4. | |
| 5. | |

COMPENSATION AND FINAL STAGES

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

| | |
|-----------|-----------|
| Full Name | Signature |
| | |
| Date | |
| | |

Of the Complainant:

| | |
|-----------|-----------|
| Full Name | Signature |
| | |
| Date | |
| | |