

**TÜBİTAK**

Türkiye Green Industry Project

**ENVIRONMENTAL and SOCIAL  
MANAGEMENT SYSTEM (ESMS)**

(SUMMARY)

**v. 17 July, 2024**

WB	World Bank
TEYDEB	Directorate of Technology and Innovation Support Programs
TGIP	Turkey Green Industry Project
GMB	Group Management Board
ESDD	Environmental and Social Due Diligence
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standards
E&S	Environment and Social
R&D	Research and Development
LMP	Labor Management Procedures
GBV	Gender-Based Violence
GRM	Grievance Mechanism
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework

## **1. INTRODUCTION**

The Scientific and Technological Research Council of Türkiye (TÜBİTAK) was established with the Law No. 278 which was published in the Official Gazette No. 11462 on July 24, 1963. The purpose of TÜBİTAK's establishment is defined as: "To work on science and technology policies in line with national priorities in cooperation with all segments of society and relevant institutions to enhance and sustain Türkiye's competitiveness and welfare; to contribute to the creation of the infrastructure and tools needed to achieve these policies; to encourage, support, coordinate, and conduct research and development activities; and to lead the development of a science and technology culture." TÜBİTAK is a legal entity with administrative and financial autonomy, associated with the Ministry of Industry and Technology (STB), and has a special budget.

"Türkiye Green Industry Project (TGIP)" is carried out by STB, the Small and Medium Enterprises Development Organization (KOSGEB), and TÜBİTAK, and is financed by the World Bank (WB). The Component 3 of TGIP, "Support the Green Innovation of Industrial Enterprises" will be managed by TÜBİTAK which aims to provide matching grants and reimbursable financing for green firm-level and platform-level innovation (product and process).

This document introduces the summary of Environmental and Social Management System (ESMS) of TÜBİTAK which has been adopted for TGIP by July 1, 2024. The purpose of the ESMS is to manage the environmental and social risks of firms involved in the project and ensure that these risks are addressed in accordance with the WB Environmental and Social Framework (ESF, 2018) and the Environmental and Social Standards (ESSs) within the ESF.

## **2. POLICY AND REGULATORY FRAMEWORK FOR ENVIRONMENTAL AND SOCIAL ASSESMENT**

### **2.1 National Environmental Legislations and Regulatory Frameworks**

TÜBİTAK operates under Turkish national laws and regulations for managing environmental and social issues, aligned with national and international standards and EU Directives. The Ministry of Environment, Urbanization and Climate Change (MoEUCC) leads policy implementation for environmental protection and sustainable development, collaborating with other ministries and stakeholders.

### **2.2 Turkish Regulations on Environmental Impact Assessment (EIA)**

Article 10 of the Environmental Law outlines the general scope of the Environmental Impact Assessment (EIA) procedure in Turkey, stating that institutions, organizations, and enterprises that cause environmental problems as a result of their planned activities are required to prepare an Environmental Impact Assessment report (for Annex-I projects) or a Project Introduction File (for Annex-II projects). The EIA Regulation was first published in the Official Gazette No. 21489 on February 7, 1993. Since then, various amendments have been made to the initial regulation, and new EIA regulations that repealed the previous regulations were published in 2008, 2013, and 2014. The most recent EIA Regulation was published in the Official Gazette No. 31907 on July 29, 2022, and repealed the 2014 EIA Regulation.

The EIA Regulation is largely in line with the EU Directive on EIA. The key relevant steps of the Turkish EIA procedure are the screening, public consultation, scoping, disclosure and supervision.

### **2.3 National Laws on Social Impacts**

Turkish laws managing social impacts include: Labour Law (2003), Occupational Health and Safety Law (2012), Right to Information Law (2003), Regulation on Contractors and Sub-contractors (2008)

### **2.4 International Requirements**

#### **International Agreements and Conventions**

Turkey adheres to numerous international agreements on environmental protection, cultural heritage, and labor, including:

- **Basel Convention:** Hazardous waste management.
- **CITES:** Trade in endangered species.
- **UN Framework Convention on Climate Change (Kyoto Protocol)**

#### **World Bank's Environmental and Social Standards (ESS)**

The World Bank's Environmental and Social Standards (ESSs) set the requirements to be met by Borrowers with respect to the identification and evaluation of social and environmental risks and impacts associated with projects supported by the WB through Investment Project Financing. The World Bank's ESSs guide TÜBİTAK in managing environmental and social risks, ensuring compliance with international standards. Relevant ESSs for TÜBİTAK include:

- **ESS1:** Environmental and Social Risk Assessment and Management
- **ESS2:** Labor and Working Conditions
- **ESS3:** Resource Efficiency and Pollution Prevention
- **ESS4:** Community Health and Safety
- **ESS5:** Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- **ESS6:** Biodiversity Conservation and Sustainable Management of Living Natural Resources
- **ESS8:** Cultural Heritage
- **ESS10:** Stakeholder Engagement and Information Disclosure

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

When Turkish regulations differ from the levels and measures presented in the EHS guidelines, projects are expected to achieve whichever is more stringent. If less stringent levels or measures than those provided in these EHS guidelines are appropriate, in view of specific project

circumstances, a full and detailed justification for any presented alternatives is needed as part of the site-specific environmental assessment.

The environmental and social risk assessment of the World Bank's Türkiye Green Industry Project (TGIP) is expressed as moderate for both environmental and social risks, resulting from activities and financed subprojects of TGIP. World Bank uses 4 categories for the risk assessment: High/Substantial/Moderate/Low.

### **3. ENVIRONMENTAL AND SOCIAL MANAGEMENT POLICY OF TÜBİTAK WITHIN THE CONTEXT OF TÜRKİYE GREEN INDUSTRY PROJECT**

In order to align with World Bank standards: TÜBİTAK is committed to Environmental and Social Sustainability, Compliance with Local Laws, Ethical Lending and Performance Monitoring. TÜBİTAK will use the same categories as WB's, (High/Substantial/Moderate/Low) in Environmental and Social Due Diligence (ESDD) reviews for project applications.

TÜBİTAK adopts policies to minimize negative environmental and social impacts and promote sustainability, in line with IFC Performance Standards and World Bank E&S Standards.

Key policy goals include: Incorporating E&S Risk Considerations, Setting Strategic E&S Objectives, Exclusion of Non-Compliant Clients, Establishing E&S Requirements, Communicating E&S Expectations, Enhanced Risk Management.

#### **3.1 Organizational Capacity and Competency**

The Project Implementation Unit (PIU) consists of TÜBİTAK employees and external E&S and OHS experts, tasked with project implementation, coordination, monitoring, and reporting. TÜBİTAK has hired three senior E&S&OHS experts respectively, to ensure proper evaluation and monitoring of projects based on E&S criteria.

#### **3.2 E&S Organizational Structure and Roles and Responsibilities**

The PIU, involving seven departments of TÜBİTAK, will ensure compliance with ESS 1, 2, 3, 4, 5, 6, 8, 9, and 10 through a structured approach:

- **Environmental and Social Questionnaire Form:** Applicant companies must complete this form and provide an E&S Commitment Letter. E&S&OHS Consultants will conduct ESDD, and E&S risk screening and categorization for each sub-project based on these submissions.
- **Monitoring and Evaluation:** TÜBİTAK will monitor projects during execution via periodic E&S reports.

#### **Key Roles and Tasks**

**PIU:** Aligns TÜBİTAK's mission and values with the project's E&S management system, engages stakeholders, and ensures resource allocation.

**E&S Focal Points:** Three senior E&S&OHS experts will coordinate E&S monitoring and reporting, ensuring compliance with ESSs.

**Environmental and Social Unit:** Comprising nine senior experts, this unit will manage E&S screening, due diligence, and project monitoring.

**Financial Control and Contracts Division of TEYDEB:** Manages the termination of non-compliant project contracts.

### **Training**

Subcomponent 3.4 aims to enhance TÜBİTAK's capacity through:

- **Awareness and Training Programs:** For companies nationwide.
- **Advisory Support:** For eligible companies, especially SMEs.
- **Monitoring and Evaluation:** Including impact assessments.
- **Dissemination of Results:** Sharing knowledge gained from the project.
- **Training for TÜBİTAK Staff:** On the ESMS content and procedures.

This subcomponent also covers operational expenses for the PIU, ensuring effective implementation and management of the project.

## **4. IDENTIFICATION, ASSESSMENT AND MANAGEMENT OF E&S RISKS AND IMPACTS**

This section outlines the E&S screening process leading to review, approval or exclusion of activities to be financed under the Project. E&S Screening Process identifies potential impacts of financed activities, determines mitigation measures, and integrates them into proposed sub-projects.

The project will be executed in compliance with the Turkish environmental, labor, and occupational health and safety legislation as well as the WB's ESF and other WB safeguards policies. TÜBİTAK will ensure that project implementation is compliant with the World Bank's ESF, particularly the relevant ESSs; the World Bank Group's EHS Guidelines; and this ESMS. Environmental and Social Risk Classification of the Project by World Bank is **Moderate**. Overall, the Project is expected to have positive E&S impacts, as it will support firms to reduce their carbon footprint, water consumption and increase their energy efficiency by supporting the development and uptake of green technologies. The main E&S risks and impacts are expected to be temporary and reversible, low in magnitude and localized, and can be mitigated through known good management practices.

Component 3 aims to enhance firms' capability in producing low-carbon products through research, development, and innovation (RDI), promoting industrial upgrading and green technology dissemination.

Key Project Results includes metrics like increased electricity and water efficiency, reduced waste, private sector investments in green technologies, and innovation in green solutions.

Stakeholder interaction plays a pivotal role throughout the project, encompassing the beneficiaries of the RDI financing measures of TÜBİTAK, such as SMEs, large companies, and universities, as well as industrial umbrella organizations and other public bodies. The project commits to a comprehensive approach to stakeholder interaction, characterized by openness

and a project life-cycle perspective, this approach will be applied across all phases of the project, including preparation, implementation, and monitoring & evaluation.

#### **4.1 Appraisal (Financing) Procedures and Process**

Türkiye Green Industry Project (TGIP), operated by TÜBİTAK, involves providing reimbursable financing for individual RDI projects and platforms. These projects will execute a variety of activities within a roadmap, including applied research, prototype development, standards development, product or process improvement, technological service innovation, R&D commercialization, and large-scale demonstrations aimed at greener production or improved energy/resource efficiency. Activities listed in the World Bank Group (WBG) exclusion list are not eligible for financing under this project.

##### **Implementation of ESMS**

The implementation of this ESMS begins with the application process, where beneficiary firms must meet several conditions to qualify:

- They must be legal entities under Turkish Commercial Law and currently active.
- They need to demonstrate creditworthiness, such as providing a guarantee letter from a bank or the Turkish Credit Guarantee Fund.
- For private enterprises, the largest shareholder must hold 75% or more ownership, ensuring majority control is not held by the public sector. Startups and spin-offs require over 50% ownership.
- They must exhibit financial viability, with assets or net sales exceeding the value of reimbursable financing received.
- They should have been operational for at least two years, excluding startups and spin-offs.
- They must be associated with low to medium environmental and social risks, adhering to screening criteria outlined in the Environmental and Social Management System.

Applicants submit various documents to prove eligibility, including a commitment letter, creditworthiness references, partnership structures, financial viability proofs, and an Environmental and Social Risk Management Declaration Form (E&S Questionnaire Form). This form ensures compliance with national environmental and social legislation and World Bank Group standards, detailing measures for pollution prevention, community health and safety, and engagement with stakeholders.

The assessment process involves checking for any involvement in harmful labour practices, compliance with environmental regulations, and adherence to World Bank exclusion lists. Initial evaluations are conducted by TEYDEB experts using the PRODIS system, with further scrutiny by TGIP's E&S&OHS experts. Projects deemed eligible progress to technical reviews by independent experts, contingent on low or moderate risk ratings.

Throughout the evaluation, senior environmental, social, and occupational health and safety (OHS) experts assess submitted documents and may recommend corrective action plans for gaps

identified during due diligence. Final decisions on project funding eligibility rest with the Group Executive Committee (GEC) after comprehensive ESDD Review.

Projects with significant impacts on biodiversity, cultural heritage, or land acquisition are excluded from financing consideration.

## **The Process and Main Steps for Ensuring Companies' Compliance with E&S Requirements**

### **Application Stage:**

- **Declarations:** Applicant companies must declare their compliance with national environmental and social legislation via the E&S Questionnaire Form submitted with the Application Form.
- **Commitment Letter:** Companies must approve a commitment letter affirming conformity with national environmental and social legislation and World Bank Group's Anti-Corruption policies. This letter also requires them to inform TÜBİTAK of any incidents and accidents immediately.

### **Control Stage:**

- **Economic Activity Declaration:** In PRODIS (TÜBİTAK's online project application system), applicant companies select their economic activity field using NACE codes. The exclusion list is displayed, and applicants must declare that neither their past activities nor those proposed fall into any of the listed exclusion categories.
- **E&S Assessment and Due Diligence:** TÜBİTAK's technical experts, assigned as Project Officers in relevant Research Support Groups, conduct assessments focusing on the exclusion list. Applications falling into the World Bank's exclusion list are rejected.
- **E&S Risk Categorization:** All applications are reviewed and categorized based on potential environmental and social risks and impacts, using declarations from the E&S Questionnaire Form and the E&S Commitment Letter. Results are recorded in the ESDD Review Form prepared by E&S&OHS experts.
- **Technical Review Adjustments:** During the technical review of low-medium risk proposals, if independent experts uncover new information about the applicant's current or planned activities, the ESDD review form is revised accordingly.

### **After Support Payment:**

- **First ESDDs Submission:** Submit the first ten Environmental and Social Due Diligence reports for the first ten companies in each support category (Individual Projects and Platform Projects) to the World Bank for No Objection before approval and payment.
- **Periodic ESDDs Submission:** Every six months, submit ten ESDDs for the largest TÜBİTAK Reimbursable Financings approved during that period.



## **E&S Risk Categorization**

Environmental, Social, and Occupational Health and Safety (OHS) experts will classify applicant companies involved in project proposals into one of four risk categories: **High Risk, Substantial Risk, Moderate Risk, or Low Risk**. This classification is based on an ESDD Review, considering the probability and severity of impacts from potential hazards.

### **Risk Categories and Characteristics:**

**High Risk:** Projects likely to cause significant adverse impacts on human populations or the environment due to their large scale, hazardous nature, or sensitive location. Effective mitigation may be difficult or impossible.

#### **Characteristics:**

- Long-term, permanent, or irreversible impacts (e.g., loss of major natural habitats).
- High magnitude and spatial extent (large geographical area or population affected).
- Significant adverse cumulative or transboundary impacts.
- High probability of serious adverse effects (e.g., due to accidents or toxic waste).

**Substantial Risk:** Projects may be less complex or smaller in scale than High Risk projects, or in less sensitive areas. Effective mitigation is more likely.

#### **Characteristics:**

- Mostly temporary, predictable, and/or reversible impacts.
- Medium to large magnitude and spatial extent.
- Potential for cumulative or transboundary impacts, but less severe than High Risk projects.
- Medium to low probability of serious adverse effects, with reliable mitigation mechanisms available.

**Moderate Risk:** Projects with potential adverse impacts that are not likely to be significant and can be easily mitigated.

#### **Characteristics:**

- Predictable and temporary/reversible impacts.
- Low magnitude.
- Site-specific impacts, unlikely to extend beyond the project footprint.
- Low probability of serious adverse effects (e.g., no use or disposal of toxic materials).

**Low Risk:** Projects with minimal or negligible potential adverse impacts on human populations or the environment. No additional assessment likely required after initial screening.

### **Categorization Considerations:**

**Type, Location, Sensitivity, and Scale of the Project:** Evaluation of the project's nature, geographical area, and affected populations.

**Magnitude of Potential Risks and Impacts:** Assessment of environmental and social risks.

**Capacity and Commitment of Applicant Companies:** Ability to manage risks in accordance with national legislation and World Bank Environmental and Social Standards (ESS).

### **Monitoring and Evaluation:**

- TÜBİTAK will not finance projects with high and substantial E&S risks.
- An E&S monitoring system will track project impacts from eligibility checks through the financing period.
- Regular monitoring of E&S impacts will be conducted to ensure compliance and successful project completion.

### **Environmental and Social Due Diligence (ESDD)**

TÜBİTAK will conduct Environmental and Social (E&S) screening of eligible companies for reimbursable grant finance under the Türkiye Green Industry Project (TGIP). Only companies with business activities judged to be of moderate or low E&S risks will be eligible for project support.

### **Eligibility and Exclusions:**

**High or Substantial Risk Activities:** Companies causing significant pollution impacts will be rated as high or substantial risk and deemed ineligible for financing.

**Excluded Activities:** Sub-projects impacting cultural heritage, involving involuntary land acquisition, or affecting biodiversity will not be financed.

### **Compliance Requirements:**

**National and International Standards:** Applicants must comply with national environmental and social laws of Türkiye, applicable World Bank Environmental and Social Framework (ESF) Environmental and Social Standards (ESSs), and applicable World Bank Group (WBG) Environmental, Health, and Safety (EHS) Guidelines.

## **5. Labour Management Procedures**

A separate Labour Management Procedure (LMP) has been prepared for the Project. The purpose of the LMP is to facilitate planning for the Project and help identify the resources necessary to address the labour issues associated with the Project.

### **5.1. Assessment of Key Potential Labour Risks**

The key labour risks associated with the Project, along with proposed mitigation measures, are outlined in the table below:

<b>Key Identified Labour Risk</b>	<b>Description</b>	<b>Proposed Mitigation Measures</b>
<b>Occupational Health &amp; Safety</b>	Risks associated with OHS in Project workers, including exposure to hazards that could result in illness or injury.	Conduct regular awareness-raising sessions for project workers and affected communities, provide adequate OHS training, use of appropriate PPE, and ensure compliance with national laws and regulations.
<b>Unfair treatment or discrimination of project workers</b>	Workers could face unfair treatment or discrimination based on personal characteristics unrelated to job requirements.	Implement Labor Management Procedures for Component 1, enforce fair recruitment policies, ensure zero tolerance to discrimination, raise awareness, monitor and enforce compliance with the Code of Conduct, and allow workers to join unions.
<b>Physical, psychological, or sexual abuse of project workers</b>	Exposure to physical, psychological, or sexual abuse, including violence, verbal abuse, bullying, and unwanted sexual attention.	Adopt a zero-harassment policy for all workers, ensure the Project GRM is available to all workers, conduct awareness-raising and training sessions, and review terms and conditions of these procedures and tools.
<b>Gender-based violence (GBV)</b>	Risks include sexual harassment, exploitative sexual relations, illicit sexual relations with minors, and human trafficking.	Provide GBV orientation for project workers, include GBV considerations in the GRM for project workers, and ensure strict enforcement of GBV policies.
<b>Transmission of COVID-19 or other communicable diseases</b>	Activities involve travel and gatherings, increasing the risk of disease transmission.	Adhere to WHO guidance and comply with national laws and regulations to mitigate the risk of COVID-19 or other communicable diseases.
<b>Grievance Mechanism</b>	Potential lack of adequate and accessible GRM, lack of awareness, or non-functionality of GRM.	Ensure the Grievance Redress Mechanism is accessible for workers under Component 1 of the Project, raise awareness about the GRM, and ensure its functionality and accessibility.

No other labour-related risks are considered relevant for Project activities under Component 3. However, this section can be revised to address any emerging labour risks and prevent further negative impacts.

## 5.2. Working Conditions and Management of Worker Relationships

The employment of project workers will be based on the principle of equal opportunity and fair treatment, ensuring no discrimination regarding any aspect of the employment relationship. TÜBİTAK will ensure the following:

- **Employment Contracts:** All national legislative requirements are stipulated in written employment contracts signed prior to the start of employment.
- **Worker Awareness:** All workers are verbally informed of the nature and duration of their employment, contracted hours, leave entitlements, and other legal rights. Contractors will be required to do the same for their workers.
- **Timely Payments:** Workers are paid on time, with no deductions unless stipulated in their contract.
- **Union Rights:** Workers who are members of a trade union will not be prevented from exercising their rights in accordance with national law.
- **Code of Conduct:** All workers must sign TÜBİTAK's "code of conduct" detailing expected behaviours and rules to minimize the risk of anti-social behaviour.
- **Contract Termination:** Contract termination and redundancies are managed in accordance with relevant national laws in Türkiye and ESS2.
- **Letters of Recommendation:** At the request of a Project worker, TÜBİTAK will prepare a letter of recommendation detailing the duration of employment, the role and tasks carried out, comments on the worker's character, and a recommendation for future employment (based on merit).

## 5.3. Protecting the Workforce

Under no circumstances will a child under the age of 18 be employed or engaged in connection with the project in a manner that is likely to be hazardous or interfere with the child's education or be harmful to the child's health or physical, mental, spiritual, moral, or social development. All forms of forced or compulsory labour are strictly prohibited, defined as work or service extracted under the menace of any penalty and for which the person has not offered themselves voluntarily.

## 5.4. TÜBİTAK Grievance Redress System

All stakeholders and individuals have the right to submit suggestions, express concerns, and grievances related to the workplace, and to file complaints and lawsuits regarding administrative actions and procedures applied to them by their managers or the workplace within TÜBİTAK and within the firms financed by TÜBİTAK.

Grievances are processed through the TUBIMER Online System (<https://tubimer.TUBITAK.gov.tr/en>), which handles "Information Requests," "Opinions/Suggestions," "Complaints," and "Objections." The system, operational since October 16, 2017, aims to increase the efficiency of TÜBİTAK's processes. Applications are evaluated by relevant departments, and applicants are responded to within a legally determined period.

## **6. E&S Monitoring, Reviewing, and Reporting**

### **6.1. Supervision Procedures**

In compliance with ESS1, TÜBİTAK will:

1. Conduct environmental and social assessments of the companies.
2. Undertake stakeholder engagement and disclose appropriate information as per ESS10.
3. Update the Environmental and Social Commitment Plan (ESCP) if necessary, and implement all measures and actions set out in the legal arrangement, including the ESCP.
4. Monitor and report on the environmental and social performance of the companies against the ESSs and ESAPs.

E&S monitoring will be an integral part of the technical progress review. Companies receiving financing from the “Industrial Innovation Networks” must submit brief progress reports every 3 months and detailed technical reports every 6 months. Companies financed under the “Green Industrial R&D and Innovation Program” must submit detailed technical reports every 6 months. E&S monitoring will be included in these reports. Companies are also obliged to inform TÜBİTAK of any E&S incidents during the reporting period and report any corrective actions from the ESDD Review.

The E&S Unit, composed of E&S&OHS experts hired by TÜBİTAK specifically for this project, will monitor E&S issues through periodic progress reports, briefly every 3 months and in detail every 6 months during the financing period.

### **6.2. External Communication Mechanism**

Open and transparent engagement with project stakeholders is essential for good international practice. Effective stakeholder engagement improves the environmental and social sustainability of projects. Objectives of ESS10 include:

1. Establishing a systematic approach to stakeholder engagement to identify stakeholders and build constructive relationships.
2. Assessing stakeholder interest and support to consider their views in project design and performance.
3. Promoting and providing means for effective and inclusive engagement with project-affected parties throughout the project lifecycle.
4. Ensuring timely, understandable, accessible, and appropriate information disclosure on environmental and social risks and impacts.
5. Providing accessible and inclusive means for project-affected parties to raise issues and grievances, and allowing Borrowers to respond and manage these grievances.

ESS10 applies to all projects supported by the Bank through Investment Project Financing. The stakeholder engagement plan defines:

1. Engagement during project preparation, including stakeholder identification and analysis, stakeholder engagement plan, information disclosure, and meaningful consultation.
2. Engagement during project implementation and external reporting.
3. Grievance mechanism.
4. Organizational capacity and commitment.

### **6.3. Environmental and Social Reporting to Investors and Other External Stakeholders**

The objective of E&S monitoring is to ensure that project activities:

- Protect human health and safety.
- Prevent environmental degradation from individual subprojects or their cumulative effects.
- Enhance positive E&S outcomes.
- Ensure compliance with World Bank ESF and Turkish Environmental Law and Regulations.

The TÜBİTAK PIU will:

- Coordinate all aspects of the SEP implementation according to ESS1 and ESS10.
- Review resources, identify needs, and communicate additional resources required for stakeholder engagement and grievance management activities.
- Monitor the Grievance Database and inform MoIT and the World Bank about the grievance resolution process.
- Maintain connections with beneficiaries to identify potential project risks early.
- Update the list of stakeholders periodically as new stakeholders are identified.
- Update the Stakeholder Engagement Plan quarterly.
- Inform stakeholders after each engagement activity to agree on follow-up actions and coordinate with additional institutions for implementation.
- Coordinate and agree on the content of reporting to external project stakeholders

### **6.4. ESMS Monitoring and Review for Continuous Improvement**

The ESMS will be periodically revised by the E&S Unit during project implementation to reflect adaptive management of project changes and unforeseen circumstances. Integration of Turkish and international legal requirements, new standards and goals, and developed monitoring processes will ensure continuous improvement of the ESMS.