

**Republic of Türkiye**  
**Ministry of Industry and Technology**  
**Türkiye: Small Industrial Estates Reconstruction and**  
**Regional Economic Recovery Project**  
**[P502837]**

**ENVIRONMENTAL and SOCIAL**  
**COMMITMENT PLAN (ESCP)**  
**(Draft)**  
**May 2024**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Türkiye (the Borrower), through its Ministry of Industry and Technology (MoIT), shall implement the Türkiye: Small Industrial Estates Reconstruction and Regional Economic Recovery Project (the Project), as set out in the Loan Agreement. The International Bank for Reconstruction and Development (the Bank) has agreed to provide financing (P502837) for the Project, as set out in the referred agreement.
2. The Borrower shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the Loan Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Bank.
4. As agreed by the Bank and the Borrower, through MoIT, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Borrower, through MoIT, and the Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Borrower [Head of Department, Directorate General of Industrial Zones, Ministry of Industry and Technology]. The Borrower shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&amp;S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s), in the format acceptable to the Bank.</p>	Submit semi-annual reports to the Bank throughout the Project implementation, commencing six months after the Effective Date. Submit each report to the Bank by no later than thirty (30) days after the end of each reporting period.	MoIT Project Implementation Unit (PIU)
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>(i) Promptly notify the World Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, <i>inter alia</i>, Occupational Health and Safety (OHS) accidents, incidents or accidents that result in threatening community health and safety, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury or loss of time of the workers. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by the MoIT, as appropriate.</p> <p>(ii) Provide sufficient detail regarding the incident or accident, findings of the Root Cause Analysis (RCA), indicating immediate measures taken or that are planned to be taken to address it, compensation paid, and any information provided by any contractor and supervising entity/consultant, as appropriate. Ensure the incident report is in line with the Bank's Environment and Social Incidence Response Toolkit (ESIRT).</p> <p>Subsequently, as per the Bank's request, prepare a report on the incident or accident and propose and implement any measures to prevent its recurrence.</p> <p>(iii) Include in bidding documents of contractors the requirement of prompt notification of accidents and incidents is required under contractor's Environmental and Social Management Plan (ESMP). Ensure an incident register at all construction sites are kept, and monitored, by the contractors throughout the period of Project implementation. [to be confirmed during negotiation]</p>	<p>(i) Notify the Bank by no later than 48 hours after learning of the incident or accident.</p> <p>(ii) Provide subsequent report to the Bank, including RCA, precautions and compensation measures taken by sub-project beneficiaries within a timeframe acceptable to the Bank.</p> <p>(iii) Throughout the Project implementation period</p>	<p>MoIT PIU</p> <p>MoIT PIU</p> <p>MoIT PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
C	<p><b>CONTRACTORS' MONTHLY REPORTS</b></p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts for all sub-project sites and monitor quality of reporting throughout the duration of works, and submit such reports to the Bank. Include reporting requirements in bidding documents of contractors.</p>	<p>Ensure submission of the monthly reports by the contractors to the PIU and summarize the non-compliances as part of the reports under Section A above throughout implementation of the Project. Submit the monthly reports to the Bank upon request [as annexes to the reports to be submitted under action A above].</p>	<p>MoIT PIU</p>

<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain /a Project Implementation Unit (PIU) with qualified staff and resources to support management of ESHS risks and impacts of the Project, including appointing one social specialist, one environmental specialist, one OHS specialist and one stakeholder engagement (SE) specialist, to be responsible for ensuring full compliance with the ESF and relevant E&amp;S instruments.</p> <p>Cause contractors to assign E&amp;S, OHS and SE/GRM focal points to manage Sub-projects' E&amp;S risks management, which includes ensuring the inclusion of this requirement in the bidding documents and contracts for civil works.</p>	<p>MoIT shall establish the PIU with specified E&amp;S staff, no later than the Effective Date of the Loan Agreement, and shall thereafter maintain the specified staffing throughout the implementation of the Project.</p> <p>Assign the specialists prior to commencement of civil works and maintain throughout Project implementation</p>	<p>MoIT PIU</p> <p>MoIT PIU; MoIT shall cause the contractors to carry out</p>
1.2	<p><b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <p>1. Adopt and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p> <p>2. Conduct subproject specific environmental and social screening for each proposed Subproject and prepare fit-for-purpose ESMP for substantial risk Subprojects, ESMP for moderate risk Subprojects, and adopt ESMP checklist and/or ES codes of practices for low risk subprojects with physical infrastructure, as set out in the ESMFs. The proposed activities described in the exclusion list set out in the ESMFs shall be ineligible to receive financing under the Project.</p>	<p>1. Adopt the ESMF prior to the Effective Date and thereafter implement the ESMF throughout Project implementation.</p> <p>2. Conduct E&amp;S screening and prepare/customize and adopt subproject specific ESMPs, ESMP checklists and/or ES codes of practice, as appropriate, prior to the launching of the bidding process for the respective Subproject that requires the adopting of such ESMP. Once adopted, and thereafter implement the respective ESMP throughout Project implementation.</p>	<p>MoIT PIU</p>

1.3	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including, <i>inter alia</i>, the requirement to comply with ESMPs, and Labor Management Procedures (LMPs), into the ESHS requirements of the procurement documents to ensure that the requirement to produce Contractor’s ESMP (based on ESMPs produced as per the ESMF), Labor Grievance Redress Mechanism (GRM) for the contractors’ personnel, and ESHS Code of Conduct are included into bidding documents for civil works contracts, and the contracts with contractors and supervising firms. Thereafter, ensure that the contractors comply with the ESHS requirements of their respective contracts.</p>	<p>As part of the preparation of procurement documents and prior to the issuance of bidding documents.</p> <p>Supervise contractors and supervising firms throughout Project implementation.</p>	<p>MoIT PIU</p> <p>MoIT PIU</p>
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1.4	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project, are carried out in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	MoIT PIU
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Prepare, disclose, consult, adopt and implement a Labor Management Procedure (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	Adopt the LMP no later than 30 days following the Effective Date, and prior to hiring of project personnel (whichever comes first) and thereafter implement and update the LMP throughout Project implementation.	MoIT PIU
2.2	<p><b>GRIEVANCE REDRESS MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish, maintain, and operate grievance redress mechanisms (GRM) for project workers, , as described in the LMP and consistent with ESS2.</p> <p>Monitor implementation of the Project workers' GRM, maintain a GRM log, and report on Project workers' grievances</p>	<p>Grievance redress mechanism established not later than 30 days after the Effective Date, prior to the recruitment of any Project workers, and thereafter maintained throughout Project implementation.</p> <p>Report on Project workers' GRM implementation activities in regular semi-annual reports as required in Section A of this ESCP.</p>	<p>MoIT PIU</p> <p>MoIT PIU</p>
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>Where assessed as necessary, implement measures of protection at work and safety for jobs with increased risk of injury and damage to health, as well as organization of training for workers in such jobs.</p> <p>Cause all contractors to adopt and implement OHS measures as detailed in LMPs and ESMPs.</p>	<p>Throughout Project implementation.</p> <p>Throughout project implementation</p>	<p>MoIT PIU (to carry out in accordance with the LMP and ESMF)</p> <p>MoIT PIU (to carry out in accordance with the LMP and ESMF)</p>
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			

3.1	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b>  Include measures to prevent and/or minimize environmental pollution during construction and operation into Contractors' individual ESMPs (including development of necessary management plans, as appropriate) following guiding principles of the ESS 3, sub-project specific ESMPs to be prepared under ESS 1 (action 1.2) above, and the WBG EHS Guidelines, and duly applied.</p> <p>Incorporate appropriate waste management procedures in Subproject ESMPs to be prepared under Part 1 (Construction of Resilient and Low Emission SIEs) in accordance with the ESMF and consistent with ESS3</p> <p>Incorporate resource efficiency measures, including water balance assessments, and pollution prevention and management measures in subproject ESMPs to be prepared under ESS 1.2 above in accordance with the ESMF and consistent with ESS3</p>	<p>Prepare and disclose sub-project specific ESMPs prior to tendering of works for each sub-project and implement thereafter.</p> <p>Apply mitigation measures throughout Project implementation.</p> <p>Throughout Project implementation. Apply at the same timeframe as for the preparation, adoption and implementation of Subproject ESMPs.</p>	<p>MoIT PIU</p> <p>MoIT PIU</p> <p>MoIT PIU</p>
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY:</b>  Incorporate measures and actions to assess and manage traffic and road safety risks through Traffic Management Plans as required in the Subproject specific ESMPs to be developed under ESS 1.2.</p> <p>Cause contractors to include these measures in the contractors' ESMPs following guiding principles of the ESMF, and to apply the said measures.</p>	<p>Prepare and disclose, Subproject specific ESMPs, in a form and substance acceptable to the Bank, prior to tendering of works for each Subproject.</p> <p>Ensure adherence to Subproject specific ESMPs throughout the Project.</p>	<p>MoIT PIU</p> <p>MoIT PIU</p>
4.2	<p><b>COMMUNITY HEALTH AND SAFETY:</b>  Assess and manage specific risks and impacts to the community arising from Project activities together with Subproject activities and ensure these measures are included in the contractor's sub management plans, in line with the respective Subproject specific ESMP and in form and substance acceptable to the Bank.</p> <p>The detailed design of new public access buildings and facilities would consider life &amp; fire safety design requirements including emergencies as specified by the WBG General EHS guidelines as well as universal access concept.</p>	<p>Prior to commencement of civil works and throughout the Project implementation</p> <p>After finalization of technical designs of investments and financing, and prior to the preparation of the respective procurement documents.</p>	<p>MoIT PIU</p> <p>MoIT PIU</p>



	<b>SEA AND SH RISKS</b> Adopt and implement a SEA/SH Action Plan as part of the ESMF, to assess and manage the risks of SEA and SH	Adopt the SEA/SH Action Plan as part of the ESMF prior to Project Effectiveness, and thereafter implement the SEA/SH Action Plan throughout Project implementation.	MoIT PIU
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<b>RESETTLEMENT PLANS:</b>  Prepare, consult upon, disclose, adopt, and implement Resettlement Framework (RF) in a manner acceptable to the Bank.  Prepare Subproject specific Resettlement Plans (RPs)/Ex Post Social Assessment (if necessary) as per the RF, disclose, consult with stakeholders, and implement in a manner acceptable to the Bank.  Establish, adopt and implement the RP with arrangements, that allows for the compensation of certain entitlements currently not covered through national legislation.  Prepare, adopt, implement RPs (if necessary), for Subprojects in a manner acceptable to the Bank.	  RF, in form and substance acceptable to the Bank, shall be publicly consulted on, finalized, adopted and publicly disclosed within 30 days of the Project effectiveness.  After finalization of detailed designs of investments, and prior to commencement of civil works.  Prior to commencement of any land acquisition activity.  Prior to commencement of civil works of sub-projects.	MoIT PIU  MoIT PIU  MoIT PIU  MoIT PIU
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
	Identify, describe and design mitigation measures for biodiversity risks and impacts in the Subproject specific ESMPs to be prepared under ESS 1.2 above in line with guidance in ESMF.	Prepare and disclose ESMPs, in form and substance acceptable to the Bank, prior to tendering of works for each Subproject.	MoIT PIU
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
	Not Relevant to the Project		
<b>ESS 8: CULTURAL HERITAGE</b>			

8.1	<p>Prepare, adopt, and implement the chance finds procedure described in the sub-project specific ESMPs developed for the Project under ESS 1.2 above.</p> <p>Include Chance Finds Procedures in all civil works contracts and cause the contractors to adhere to the said procedures.</p>	<p>Implement chance find procedures included in the sub-project specific ESMPs, in each instance of when a chance find occurs, throughout the implementation of the Project.</p> <p>Include chance finds procedure in all ESMPs and bidding documents for subprojects.</p>	<p>MoIT PIU</p> <p>MoIT</p>
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
	Not Relevant to the Project		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE:</b> Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p>	Update the draft SEP within 30 days of the Effective Date, and thereafter implement the SEP throughout Project implementation.	MoIT PIU
10.2	<p>Establish, publicize, maintain, and operate an accessible grievance redress mechanism (GRM), to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>Manage, respond to and monitor project grievances.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	<p>Grievance redress mechanism to be established not later than 30 days after the Effective Date and maintained throughout Project implementation.</p> <p>Reporting on received grievances – Quarterly in progress reports throughout the Project implementation.</p>	<p>MoIT PIU</p> <p>MoIT PIU</p> <p>MoIT PIU</p>
<b>CAPACITY SUPPORT (TRAINING)</b>			

CS1	<p>Training may be required for the PIU, the supervision consultancy firm, stakeholders, communities, Project workers on:</p> <ul style="list-style-type: none"> <li>• Requirements of the World Bank ESF</li> <li>• Preparation of site-specific E&amp;S Instruments</li> <li>• OHS</li> <li>• Stakeholder mapping and engagement</li> <li>• Specific aspects of environmental and social assessment</li> <li>• Emergency preparedness and response</li> <li>• Code of conduct including SEA/SH and GBV</li> <li>• Land acquisition, restrictions on land use and involuntary resettlement</li> <li>• Community health and safety</li> <li>• Building back better (e.g. universal access, climate resilience, seismic resilience, energy efficiency).</li> </ul>	<p>Within the first year of the Project implementation, before start of the Project activities, and followed by a minimum one annual refresher training</p>	<p>MoIT PIU</p>
CS2	<p>Training to be delivered to Project workers on occupational health and safety (OHS), including on emergency prevention and preparedness and response arrangements to emergency situations, vehicular safety, safe use of tools, machinery and equipment, working at heights, environmental, OHS and social requirements related to procurement (bidding documents, contractor ESMP, etc.), labor requirements for primary suppliers, and diverse and respectful workplaces, free of SEA/SH.</p>	<p>Prior to the commencement of the civil works for the respective subprojects and throughout the respective Subprojects' implementation, during the implementation of the Project.</p>	<p>MoIT</p>