



**Agricultural Employment Support for Refugees and  
Turkish Citizens through Enhanced Market Linkages  
(P171543)**

**- ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN -  
(ESCP)**

**FEBRUARY 2020**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Agricultural Credit Cooperatives (ACC) will implement the Agricultural Employment Support for Refugees and Turkish Citizens through Enhanced Market Linkages Project (the Project). The International Bank for Reconstruction and Development (hereinafter the [Bank/the Association]) has agreed to provide financing for the Project.
2. ACC will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (ESSs). This Environmental and Social Commitment Plan (ESCP) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. ACC will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, specifically the Environmental and Social Management Plans (ESMP), Labor Management Procedure (LMP), and Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S documents.
4. ACC is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by ACC as required by the ESCP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Bank and ACC, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, ACC will agree to the changes with the Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Bank and the ACC. The ACC will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the ACC shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

<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 documents required under the ESCP, stakeholder engagement activities, performance of the grievance mechanism(s).</p>	Semi-annually throughout Project implementation	ACC PIU
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly notify the 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 but not limited to; incidents and accidents encountered during construction works if required by sub-projects, environmental spills, etc.</p> <p>Provide sufficient detail regarding the incident or accident, findings of the Root Cause Analysis (RCA), indicating immediate measures or corrective actions taken or that are planned to be taken to address it, compensation paid, and any information provided by any contractor and supervision consultant, as appropriate. Ensure the incident report is in line with the World 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 any measures to prevent its recurrence.</p> <p>Specify in the contract farming contracts and agreement on sub-projects that prompt notification of accidents and incidents remain inclusive under ESMF adapted from ACC ESMF. Ensure that an incident register is kept by the Regional Offices of the ACC throughout the Project life.</p>	ACC will report details of any significant environmental or social incidents (e.g. fatalities, lost time incidents, environmental spills etc.) within 3 business days. ACC will submit an incident report, including RCA, precautions and compensation measures taken within 30 business days	ACC PIU
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			

<p>1.1</p>	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain a Project Implementation Unit (PIU) under ACC with qualified staff and resources to support management and monitoring of E&amp;S risks by appointing 2 designated technical staff:</p> <ul style="list-style-type: none"> <li>• one environmental specialist to manage the implementation of Environmental and Social Management Framework (ESMF), guide the preparation and supervise the implementation of subproject-specific ESA documents(Short-term staff),</li> <li>• one social expert designated for Grievance Redress Mechanism (GRM), stakeholder engagement management and monitoring of labor management procedure</li> </ul> <p>If needed, additional staff to be recruited.</p>	<p>Establish PIU before project effectiveness</p> <p>Maintain duly staffed PIU throughout the project life</p>	<p>ACC</p>
<p>1.2</p>	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>Finalize, disclose and implement, the Environmental and Social Management Framework (ESMF) for the Project, in a manner acceptable to the Bank.</p> <p>Screen any proposed sub-projects in accordance with the ESMF prepared for the Project, and, thereafter, draft, adopt, and implement the subproject Environmental and Social Management Plans (ESMPs), as required, in a manner acceptable to the Bank.</p>	<p>Disclose, discuss with stakeholder and finalize ESMF before project negotiations</p> <p>Implement ESMF throughout the project life</p> <p>Undertake screening and prepare ESMPs before commencement of any micro-grants as appropriate, throughout Project implementation</p>	<p>ACC</p> <p>ACC PIU</p>

<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES:</b> Develop and, thereafter, maintain and implement LMP consistent with national legislation and ESS2, and ensure that Project workers are aware of it and it is accessible to them.</p> <p>Include LMP into contract farming contracts and sub-projects obliging compliance e with LMP provisions on community workers.</p>	<p>Project LMP - Delivered and disclosed prior to negotiations.</p> <p>Implement and monitor LMP throughout project life and report through semi-annual progress reports.</p>	ACC PIU
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS:</b> Establish, maintain, and operate an accessible GRM for Project workers as described in the LMP, in line with national labor law and consistent with ESS2.</p>	<p>Before project effectiveness and maintained throughout the project implementation.</p> <p>Report semi-annually through Project Progress Reports.</p>	ACC ACC PIU
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b> Prepare, adopt, and implement occupational health and safety (OHS) measures specified in ESMF and LMP.</p> <p>Ensure sub-projects implement OHS measures as detailed in ESMF and LMP.</p> <p>Maintain responsibility of applying national law on OHS and relevant regulations.</p>	<p>After project effectiveness, and before commencement of any micro-grants and continuing throughout Project implementation.</p>	ACC PIU
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b> Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from sub-project activities, and include measures in the subproject-specific ESA documents (ESMPs) to be prepared under action 1.2 above, in a manner acceptable to the Bank.</p>	<p>Before commencement of any micro-grants as appropriate, throughout Project implementation</p>	ACC PIU
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			

4.1	<b>COMMUNITY HEALTH AND SAFETY:</b> Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from sub-project activities, and include measures in the subproject-specific ESA documents (ESMPs) to be prepared under action 1.2 above, in a manner acceptable to the Bank.	Before commencement of any micro-grants as appropriate, throughout Project implementation	ACC PIU
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	Not Relevant to the Project		
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS:</b> Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts on biodiversity and/or living natural resources, including the risk of water contamination due to pesticides runoffs to water cycle, and include measures in the subproject-specific ESA documents (ESMPs) to be prepared under action 1.2 above, in a manner acceptable to the Bank.	Before commencement of any micro-grants, as appropriate, throughout Project implementation	ACC PIU
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	Not Relevant to the Project		
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	Not Relevant to the Project		
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
9.1	Not Relevant to the Project		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>SEP PREPARATION:</b> Disclose draft SEP, conduct consultations and finalize SEP, acceptable to the Bank  Implement SEP.	Before to Negotiations  Throughout the project live	ACC
10.2	<b>SEP IMPLEMENTATION</b> Assign a social specialist to oversee and undertake the stakeholder engagement activities defined in SEP and report progress on SEP and GRM.	Before project effectiveness	ACC

10.3	<p><b>PROJECT GRIEVANCE MECHANISM:</b> Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP.</p> <p>Assign staff, as defined in 10.2, to manage and monitor project grievances.</p> <p>Ensure timely resolution, response and reporting of grievances.</p>	<p>Before project effectiveness</p> <p>Reporting – Semi-annually in progress reports.</p>	ACC PIU
10.4	<p><b>INFORMATION DISCLOSURE</b> Ensure project information disclosure to stakeholders and project beneficiaries in the relevant local languages and in a manner accessible and culturally appropriate, considering any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs.</p>	Throughout project implementation	ACC PIU
<b>CAPACITY SUPPORT (TRAINING)</b>			
CS1	ACC staff, including regional offices and primary ACCs, and beneficiary employers to be trained on E&S requirements (including implementation, monitoring and reporting of ESAs, ESMPs, SEPs, LMP) of the Bank.	First sessions within three months after the project effectiveness; further regular sessions throughout project implementation	ACC PIU (engaging consultancy services)