



REPUBLIC OF TURKEY  
MINISTRY OF INDUSTRY AND TECHNOLOGY

SOCIAL ENTREPRENEURSHIP, EMPOWERMENT AND COHESION  
IN REFUGEE AND HOST COMMUNITIES IN TURKEY PROJECT

**Draft**

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN  
(ESCP)

27 November 2019

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. The Directorate General of Development Agencies (DGDA) of The Ministry of Industry and Technology (MoIT) will implement the Social Entrepreneurship Project (the **Project**), with the involvement of the following Development Agencies (covering selected project provinces): Silkroad (Gaziantep, Kilis, Adiyaman), Cukurova (Adana, Mersin), East Mediterranean (Hatay, Kahramanmaras, Osmaniye), Karacadag (Diyarbakir, Sanliurfa) and Tigris (Mardin), and the Community Implementing Partners (CIPs) which will be selected competitively for the project in order to deliver activities under Component 1. The International Bank for Reconstruction and Development (hereinafter the Bank) has agreed to provide financing for the Project as the administrator of funds under the European Union Commission Facility of Refugees in Turkey.
2. MoIT 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. MoIT will also comply with the provisions of:
  - *Environmental and Social Management Framework (ESMF)*;
  - *Labor Management Procedure (LMP)*; and
  - *Stakeholder Engagement Plan (SEP)*.and the timelines specified in these documents.
4. MoIT 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 MoIT 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 MoIT, 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, MoIT 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 MoIT. The MoIT 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 MoIT 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> Prepare and submit regular monitoring reports on the implementation of the ESCP, environmental and social management framework, stakeholder engagement activities, functioning of the grievance mechanisms (GRM).</p>	Semi-annually throughout Project implementation	MoIT PIU. Data will be collected from Development Agencies and through CIPs
B	<p><b>QUARTERLY MONITORING</b> Maintain and monitor quarterly progress reports at all sub-project sites, throughout the duration of the project. Include reporting requirements in bidding documents of CIPs</p>	Quarterly	MoIT, Development Agencies and CIPs
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b> Establish and maintain a Project Implementation Unit under MoIT 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 implement ESMF, guide preparation and supervise ESMF checklists,</li> <li>• one social (stakeholder) experts designated staff for (Grievance Redress Mechanism) GRM and stakeholder engagement management and monitoring</li> </ul> <p>Share the Terms of Reference for the Environmental and Social Specialists</p> <p>Hire Environmental and Social Specialists as needed to ensure compliance with the ESMF and SEP.</p>	Before project effectiveness	MoIT PIU  MoIT PIU  DA
1.2	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b> Finalize, disclose and implement, the Environmental and Social Management Framework (ESMF) for the Project, in a manner acceptable to the Bank.</p> <p>Include detailed environmental and social risk mitigation measures as described in ESMF/ESMPs, POM and/ or SEP in Sub-grant manuals and bidding documents of contractors.</p>	<p>Before project effectiveness</p> <p>Before commencement of grant disbursement and throughout project implementation</p>	MoIT PIU and DAs  MoIT and DAs

<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<b>LABOR MANAGEMENT PROCEDURES:</b> MoIT will finalize and implement the Labor Management Procedures (LMP). LMP will include age verification procedure.	Before project effectiveness and throughout the project implementation	MoIT PIU
2.2	<b>GRIEVANCE MECHANISM FOR PROJECT WORKERS:</b> MoIT will maintain and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. The grievance mechanism will be designed in such way to enable reporting on any cases of child and forced labour.	Before project effectiveness and throughout the project implementation	MoIT PIU
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b> Resource efficiency and pollution prevention and management measures will be covered under ESMF and the sub-project specific ESMP as per ESMF.	Before commencement of any civil works as appropriate, throughout Project implementation	MoIT PIU and DAs
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>COMMUNITY HEALTH AND SAFETY:</b> Ensure grant recipients to be in line with community health and safety measures that will be covered under the sub-project specific ESMPs to be prepared as per ESMF.	Before commencement of any civil works as appropriate, throughout Project implementation	MoIT PIU and DAs
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	Include in the ESMF and the Sub-Grant Manual procedures and criteria of social screening to exclude any activities that may cause physical or economic displacement, including a screening form.	Before project effectiveness	MoIT PIU and DAs
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	Not Relevant to the Project		
<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> Finalize SEP acceptable to the Bank	Before project effectiveness	MoIT

10.2	<p><b>SEP IMPLEMENTATION</b></p> <p>MoiT will assign a social specialist to oversee the stakeholder engagement activities defined in SEP with Development Agencies and CIPs, and report progress on SEP and GRM.</p>	Before project effectiveness	MoiT PIU
10.3	<p><b>PROJECT GRIEVANCE MECHANISM:</b></p> <p>Develop, adopt, maintain and operate throughout project implementation a three-level grievance mechanism, as described in the SEP. The grievance mechanism will include a channel to receive and address grievances related to sexual exploitation and abuse (SEA) and sexual harassment (SH)</p> <p>Ensure a GRM is established and maintained throughout project implementation at DA and also CIP level.</p> <p>Ensure timely reporting of grievances for each sub project to MoiT. Semi-annual reports the World Bank will include reporting on grievances received.</p>	<p>Before project effectiveness</p> <p>Before project effectiveness</p> <p>Throughout project implementation</p>	MoiT PIU
10.4	<p><b>INFORMATION DISCLOSURE</b></p> <p>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	MoiT PIU