

**REPUBLIC OF TÜRKİYE
MINISTRY OF INDUSTRY AND TECHNOLOGY**

**Türkiye Socially Inclusive Green Transition Project
(P180173)**

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

Final

February 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Türkiye (the Borrower) will implement the Türkiye Socially Inclusive Green Transition Project (P180173) (the Project), with the involvement of the Ministry of Industry and Technology (MoIT), as set out in the Loan Agreement. The International Bank for Reconstruction and Development (the Bank) has agreed to provide financing 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, 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, through the Director General of the Directorate General of Development Agencies in the MoIT. The Borrower, through MoIT, shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</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&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>	<p>Submit quarterly reports to the Bank throughout the Project implementation, commencing after the Effective Date of the Loan Agreement. Submit each report to the Bank not later than thirty (30) days after the end of each reporting period, including the first report thirty (30) days after the Effective Date of the Loan Agreement.</p>	<p>MoIT Project Implementation Unit (PIU)</p>
B	<p>INCIDENTS AND ACCIDENTS</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, <i>inter alia</i>, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. 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 any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the Bank’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Bank no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the Bank within a timeframe acceptable to the Bank. The said reports shall include root cause analysis, precautions and compensation measures taken.</p>	<p>MoIT PIU</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain a PIU under the Directorate General of Development Agencies with qualified staff and resources to support management of ESHS risks and impacts of the Project, including one environmental specialist, one occupational health and safety (OHS) specialist, and one social specialist.</p>		<p>MoIT</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>Retain an environmental and social consultancy firm to provide as-needed support (preparation of environmental and social instruments, capacity building of Development Agencies and/or Subproject Beneficiary, implementation supervision) for substantial risk Subprojects.</p>	<p>Establish the PIU as set out on the Loan Agreement prior to the Loan Effective Date and maintain throughout Project implementation. Hire or assign qualified environmental, OHS and social staff under Terms of Reference acceptable to the Bank no later than 30 days after the Effective Date of the Loan, and thereafter maintain these positions throughout Project implementation.</p> <p>The firm shall be contracted before the commencement of construction works for any substantial risk Subprojects.</p>	
<p>1.2 ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>a. Disclose, consult, adopt, and thereafter implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p> <p>b. Disclose, consult, adopt, and thereafter implement Labor Management Procedures (LMP), a Stakeholder Engagement Plan (SEP), and a Resettlement Framework (RF) for the Project, consistent with the relevant ESSs.</p> <p>c. As part of the screening of Subprojects, prepare, disclose, consult, adopt, and thereafter implement Subproject-specific Environmental and Social Impact Assessments (ESIAs) and/or Environmental and Social Management Plans (ESMPs), Resettlement Plans (RPs) or Ex-post Audits for relevant Subprojects as described in the ESMF. Cause Development Agencies and Sub-project Beneficiary under Parts 1 and 2 of the Project to adopt the ESIAs, ESMPs, RPs or Ex-post Audits as applicable. The proposed subprojects described in the exclusion list set out in the ESMF, and the Exclusion List under the Loan Agreement, shall be ineligible to receive financing under the Project. Exclusions include any activities rated as having “high” environmental risks, “high” social risks, or</p>	<p>a. Adopt the ESMF prior to appraisal and thereafter implement the ESMF throughout Project implementation.</p> <p>b. Adopt the LMP, SEP, and RF prior to appraisal and thereafter implement the LMP, SEP, and RF throughout Project implementation.</p> <p>c. For Subprojects rated as having Substantial environmental risks (and with social risks rated as no higher than moderate), the ESIAs/ESMPs shall be submitted to the Bank for prior review and no objection prior to tendering of works for each subproject throughout the Project implementation.</p>	<p>MoIT PIU MoIT PIU shall cause the relevant Development Agencies to implement and to ensure implementation by relevant Subproject Beneficiaries</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>“substantial” social risks, including activities with significant impacts on biodiversity and cultural heritage.</p>	<p>For Subprojects with low and moderate E&S risk, this requirement for Bank prior approval shall continue until a date to be established by agreement of the Bank and MoIT.</p> <p>Prepare and submit all RPs/Ex-post Social Audits to the Bank’s prior review and no objection and then disclose and consult upon as described in the RF prior to commencement of any construction works.</p> <p>Once these instruments are adopted, cause the instruments to be implemented throughout implementation.</p>	
<p>1.3 MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, <i>inter alia</i>, the relevant E&S instruments, the LMP, and Code of Conduct, into the ESHS specifications of the procurement documents and contracts with contractors. Thereafter ensure that the contractors comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p>	<p>Prior to signing Subproject Financing Agreements.</p>	<p>MoIT PIU shall cause the relevant Development Agencies to implement</p>
<p>1.4 TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project, including the Incubation support services under Part 1.B(ii) of the Project, the Green Economic Opportunities and Challenges Analysis under Part 3.A of the Project, and the capacity strengthening activities under Part 3.B of the Project. that are carried out in accordance with terms of reference acceptable to the Bank, and that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	<p>Throughout Project implementation.</p>	<p>MoIT PIU shall cause the relevant Development Agencies to implement</p>
<p>1.5 CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING</p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>a. Ensure that the Contingent Emergency Response Component (CERC) Manual, as specified in the Loan Agreement, includes a description of the ESHS assessment and management arrangements including, if applicable, any CERC-ESMF/ESMF Addendum that will be included or referred to in the CERC Manual, for the implementation of the CERC Part 4 of the Project, in accordance with the ESSs.</p> <p>b) Prepare, consult, adopt, and disclose any E&S instruments which may be required for activities under the CERC of the Project, in accordance with the CERC Manual and, if applicable, CERC-ESMF or CERC-ESMF Addendum and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.</p>	<p>a. Adopt the CERC Manual in form and substance acceptable to the Bank is a withdrawal condition under Section E of Schedule 2 of the Loan Agreement for the Project.</p> <p>b. Submit the respective E&S instrument for the Bank’s prior review and approval and include it as part of the respective bidding process, and in any case, before the carrying out of the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation.</p>	MoIT PIU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt and implement the LMP for the Project, including, <i>inter alia</i>, 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 and subcontractors.</p>	Adopt the LMP prior to appraisal and thereafter implement the LMP throughout Project implementation.	MoIT PIU
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p> <p>Cause Development Agencies to establish regional-level grievance mechanisms.</p>	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	MoIT PIU shall implement, and shall cause Development Agencies to implement regionally

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		Development Agencies shall establish regional-level grievance mechanisms prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PROCEDURES Incorporate appropriate waste management procedures in Subproject ESMPs to be prepared under action 1.2 above in accordance with the ESMF and consistent with ESS3.	Adopt Subproject ESMPs before the commencement of the respective Subproject activities and implement throughout the respective Subproject implementation period.	MoIT PIU MoIT PIU shall cause the relevant Development Agencies to implement
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in subproject ESMPs to be prepared under action 1.2 above in accordance with the ESMF and consistent with ESS3.	Adopt Subproject ESMPs before commencement of the respective Subproject activities and implement throughout the respective Subproject implementation period.	MoIT PIU shall cause the relevant Development Agencies to implement
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate appropriate measures to manage traffic and road safety risks in subproject ESMPs to be prepared under action 1.2 above in accordance with the ESMF and consistent with ESS4.	Incorporate traffic and road safety measures in respective Subproject ESMPs before commencement of respective Subproject activities and implement throughout the respective Subproject implementation period.	MoIT PIU shall cause the relevant Development Agencies to implement
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community and personnel arising from Project activities and include mitigation measures in the ESMPs to be prepared under action 1.2 above in accordance with the ESMF and consistent with ESS4.		MoIT PIU shall cause the relevant Development Agencies to implement

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		Include community health and safety risk mitigation measures in respective Subproject ESMPs before commencement of Subproject activities and implement throughout the respective Subproject implementation period.	
4.3	<p>SEA AND SH RISKS</p> <p>Prepare, adopt and implement a Project level SEA/SH Action Plan to assess and manage the risks of SEA and SH.</p>	Adopt the SEA/SH Action Plan before the commencement of any civil works under the Project and thereafter implement throughout Project implementation.	MoIT PIU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT POLICY FRAMEWORK</p> <p>Disclose, consult, adopt and implement the RF for the Project, consistent with ESS5.</p>	Adopt the RF prior to appraisal and thereafter implement the RF throughout Project implementation.	MoIT PIU
5.2	<p>RESETTLEMENT PLANS AND EX-POST AUDITS</p> <p>Prepare, adopt, and implement RPs or Ex-post Audits for Subprojects for which the RF requires such instruments, as set out in the RF and consistent with ESS5.</p>	Submit all RPs or Ex-post Audits for the Bank's prior review and no objection, adopt, and disclose the RP or Audit. Once adopted, cause the RP or the Audit to be implemented by the Subproject Beneficiary and/or relevant local authorities prior to the commencement of demolition or reconstruction or retrofitting works.	MoIT PIU; MoIT PIU shall cause the relevant Development Agencies to implement and to ensure implementation by relevant Subproject Beneficiaries
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Ensure that the respective measures to manage biodiversity risks are developed and reflected in site-specific ESMPs, in accordance with the ESMF and consistent with ESS6.</p>		MoIT PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		Incorporate biodiversity risk mitigation measures in respective Subproject ESMPs before commencement of respective Subproject activities and implement them throughout the respective Subproject implementation period.	
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
No Relevant			
ESS 8: CULTURAL HERITAGE			
8.1	CHANCE FINDS Incorporate measures to manage chance finds in subproject ESMPs to be prepared under action 1.2 above in accordance with the ESMF and consistent with ESS8.	Incorporate chance find management procedures in respective Subproject ESMPs before commencement of respective Subproject activities and implement in case of chance finds.	MoIT PIU shall cause the relevant Development Agencies to implement
ESS 9: FINANCIAL INTERMEDIARIES			
No Relevant			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Adopt, and implement a 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.	Adopt the SEP prior to appraisal and thereafter implement the SEP throughout Project implementation	MoIT PIU shall implement, and shall cause Development Agencies to implement regionally
10.2	PROJECT GRIEVANCE MECHANISM Establish, publicize, maintain, and operate an accessible Project-level grievance mechanism, 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. Prepare Grievance Mechanism Manual, setting out separate GM procedures for Project stakeholders and for Project workers for managing grievances.	Establish the Project-level grievance mechanism no later than the Loan Effective Date, and thereafter maintain and operate the mechanism throughout Project implementation.	MoIT PIU shall implement, and shall cause Development Agencies to implement regionally

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<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>Cause Development Agencies to establish regional-level grievance mechanisms.</p>	Development Agencies shall establish regional-level grievance mechanisms prior to grant call for proposals.	
CAPACITY SUPPORT			
CS1	<p>Training to be provided to MoIT and Development Agencies staff responsible for E&S risk management on:</p> <ul style="list-style-type: none"> - The World Bank Environmental and Social Framework (ESF) policy – with focus on the E&S Standards that are relevant to the Project. - E&S requirements and procedures in the ESMF, LMP and RF: Identification and assessment of E&S risks, selection and application of risk management measures and plans, labor management procedures, E&S monitoring and reporting, incident and accident reporting. - Application of SEP and the grievance mechanism. - Gender sensitivity and equality - Overview of green infrastructure and green jobs - ESG Reporting Standarts 	Before the initial call for subproject proposals and throughout implementation, as needed	MoIT PIU
CS2	<p>Training to be delivered to Project workers on 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, COVID-19 specific LMP measures, and diverse and respectful workplaces, free of SEA/SH.</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.	MoIT PIU to implement and to cause Development Agencies to implement