

ILBANK

**Turkey Climate and Disaster Resilient Cities
Project (P173025)**

**[Draft]
ENVIRONMENTAL and SOCIAL
COMMITMENT PLAN (ESCP)**

February 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. İller Bankasi Anonim Şirketi (hereafter known as ILBANK), with the guarantee of the Ministry of Treasury and Finance (MoTF) of the Republic of Turkey, will implement the Turkey Urban Resilience Project (P173025) (the **Project**) with the involvement of the cities of Izmir, Istanbul, Manisa, Tekirdağ and Kahramanmaraş. The World Bank (hereinafter the **Bank**) has agreed to provide financing for the Project.
2. ILBANK 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. ILBANK will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Management Framework (ESMF), Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs), Resettlement Framework (RF), Resettlement Plans (RPs), Stakeholder Engagement Plans (SEPs), Labor Management Procedures (LMP) and the timelines specified in those E&S documents.
4. ILBANK is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the cities 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 ILBANK 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 ILBANK, 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, ILBANK 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 ILBANK and the Bank. ILBANK 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, ILBANK will provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include risks and impacts on vulnerable groups and communities, environment, livelihoods, community and occupational health and safety, labor conditions and gender-based violence.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
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 environmental and social (E&S) documents required under the ESCP, stakeholder engagement activities, performance of the grievance mechanism(s).</p> <p>Ensure frequency and content of monitoring reports is detailed in Project Operations Manual (POM) and implemented accordingly.</p>	<p>Semi-annually (every 6 months) throughout the Project implementation.</p> <p>Preparation of POM will be considered as an effectiveness condition.</p>	<p>ILBANK Project Management Unit (PMU)</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Bank of any incident or accident related to the Project which has, a significant adverse effect on the environment, the affected communities, the public or workers such as Occupational Health and Safety (OHS) accidents or that result in threatening community health and safety, including health and safety serious injuries and road accidents and sexual exploitation and abuse/sexual harassment (SEA/SH).</p> <p>Subsequently, as per the Bank's request and in line with the Bank's Environmental and Social Incidence Response Toolkit (ESIRT), prepare a report providing sufficient detail regarding the incident or accident, finding 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. Propose any measures to prevent its recurrence.</p> <p>Include in bidding documents of contractors that prompt notification accident and incidents remain inclusive under contractor's ESMP. Ensure and monitor that an incident register at all construction sites are kept by the contractors throughout the Project life.</p>	<p>ILBANK shall obligate municipalities and utilities to report details of any significant environmental or social incidents (e.g. fatalities, lost time incidents, environmental spills, etc.) within 3 business days.</p> <p>ILBANK shall obligate municipalities and utilities to submit an incident report, including RCA, precautions and compensation measures taken within 30 business days.</p> <p>ILBANK shall forward the incident report to the Bank immediately upon receipt from municipalities and utilities.</p>	<p>ILBANK PMU in coordination with the Project Implementation Units (PIUs), as relevant.</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
C	<p>CONTRACTORS QUARTERLY REPORTS</p> <p>Obligate contractors to provide to Municipalities’/Utilities’ PIUs quarterly progress reports for all sub-project sites and monitor quality of reporting throughout the duration of works. Include reporting requirements in bidding documents of contractors.</p>	Throughout Project implementation.	ILBANK PMU; PIUs
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain an organizational structure with qualified staff and resources to support management and monitoring of E&S risks, acceptable to the Bank, as follows:</p> <ul style="list-style-type: none"> ○ ILBANK shall establish and maintain a Project Management Unit (PMU) under the International Relations Department of ILBANK to manage and coordinate the entire Project with qualified and experienced personnel and resources to support the management of ESHS risks by assigning: <ul style="list-style-type: none"> ○ one Environmental Specialist to address environmental risks and impacts identified under the Environmental and Social Impact Assessment (ESIA) reports, Environmental and Social Management Plans (ESMPs) and sub-management plans; ○ one Social Expert to address social risks and impacts under the Environmental and Social Impact Assessment (ESIA) reports, Environmental and Social Management Plans (ESMPs), land acquisition, and labor issues, including stakeholder engagement and grievance redress; and ○ one Occupational Health and Safety (OHS) specialist to address OHS risks and impacts under the Environmental and Social Impact Assessment (ESIA) reports, Environmental and Social Management Plans (ESMPs) and sub-management plans. <p>Ensure that above-mentioned staff remain on assigned duty until the end of Project implementation.</p>	<p>An organizational structure of PMU shall be established prior to Loan Effectiveness. All designated ILBANK staff will serve for the duration of the Project.</p> <p>Any additional staff for key functions shall be employed 2 months before commencement of any sub-project (if needed).</p> <p>Municipalities to establish their PIUs no later than 30 days after the sub-loan agreement is signed.</p>	ILBANK PMU; PIUs

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<p>The municipalities shall each establish and maintain Project Implementation Units (PIUs). The PIU staff will be responsible for full compliance with the ESF and relevant instruments. All PIUs which will have civil works will include qualified staff and resources to support the management of E&S risks by appointing one social specialist, one environmental specialist and one OHS specialist.</p> <p>Obligate municipalities/utilities to assign E&S, ESHS and SE/Grievance Mechanism (GM) focal points for management of sub-projects' E&S risks. This obligation to be included as condition of the subloan agreements with municipalities/utilities.</p> <p>Obligate contractors to assign E&S, ESHS and SE/GM focal points for sub-projects' E&S risk management by including this requirement in the bidding documents for works.</p> <p>Maintain the structure of the complete PIUs throughout Project implementation.</p>		
<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>Screen any proposed sub-project in accordance with the ESMF prepared for the Project and thereafter prepare, disclose, adopt, and implement sub-project specific Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs), ESMP Checklists, Stakeholder Engagement Plans (SEPs), Resettlement Plans (RPs), and other instruments as necessary, including Waste Management Plans (WMP), Hazardous Waste Management Plan, Community Health and Safety Plan (CHSP), Traffic Management Plans (TMP), Occupational Health and Safety Management Plans (OHSMP), Chance Find Procedure, and any other instruments required in a manner acceptable to the Bank, as relevant.</p> <p>Include provisions for safeguards tasks and instruments in tender documents and contract requirements so that detailed design tasks reflect phasing for activities such as the ESMPs, ESIAs, SEPs and RPs.</p> <p>Ensure that the requirements of the ESF are integrated into ToRs to be prepared for each feasibility study.</p> <p>ILBANK will adopt Environmental and Social Management System (ESMS) for its overall IFI financed portfolio (per item 9.1 below).</p>	<p>Sub-project site specific ESIA and/or ESMPs, RPs and SEPs shall be prepared and disclosed before the commencement of tendering works for the relevant activities. ESMPs shall be included in bidding documents, and thereafter shall be implemented throughout the respective sub-project implementation.</p> <p>High risk sub-projects are excluded from project financing.</p> <p>ESMS will be established by Loan Effectiveness.</p>	<p>ILBANK PMU to supervise and monitor preparation, disclosure and implementation of ESIAs, ESMPs, SEPs, and RPs.</p> <p>PIUs to be responsible for preparation, disclosure and implementation of site specific E&S instruments.</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>Implement the ESMF for the Project, in a manner acceptable to the Bank.</p> <p>Screen any proposed subproject in accordance with the ESMF prepared for the Project, and, thereafter, draft, adopt, and implement the subproject ESMPs, and ESIA as required, in a manner acceptable to the Bank.</p> <p>Implement Resettlement Framework (RF), Stakeholder Engagement Plan (SEP), and Labor Management Procedure (LMP) for the Project, as required, in a manner acceptable to the Bank.</p> <p>Prepare, disclose and implement site-specific ESIA/ESMPs, SEPs, Resettlement Plan (RP) for the sub-projects, as required, in a manner acceptable to the Bank.</p> <p>Ensure ILBANK ESMS, approved by the Bank, is fully operational and implemented throughout the life cycle of the project.</p>	<p>ESMF – implemented throughout Project implementation.</p> <p>ESIA and ESMPs – delivered and disclosed prior to tendering of works for each sub-project.</p> <p>SEPs– delivered and disclosed before commencement of any civil works.RP and Ex-Post Social Audit – after Loan Effectiveness and before commencement of any civil works.</p> <p>ESMS – implemented throughout Project implementation</p>	<p>ILBANK PMU, to be responsible for the preparation of Project-level instruments (ESMF, SEP, RF, LMP) and for supervising and monitoring the preparation, disclosure, and implementation of subproject specific instruments.</p> <p>The PIUs to be responsible for the development, disclosure, and implementation of sub-project specific environmental and social plans and instruments for the subprojects.</p> <p>ILBANK will implement the Bank approved ESMS for its financing operations.</p>
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the requirements of the approved ESMPs, LMP, and other relevant E&S documents and/or plans into the environmental, social, health and safety specifications of works. Thereafter, ensure that the contractors and supervising firms comply with the ESHS specifications of their respective contracts.</p> <p>Obligate contractors and supervision consultants that E&S, ESHS and SE/GM focal points are assigned for managing E&S risks of sub-projects through including this obligation into bidding documents. Ensure contractors maintain these staff throughout the life of their contracts.</p>	<p>Prior to signing of contract with contractors.</p> <p>Supervise and monitor contractors’ ESHS performance throughout Project implementation.</p> <p>Supervision consultants should monitor regularly on behalf of the PIUs.</p> <p>PIUs to monitor monthly, and ILBANK PMU to monitor semi-annually.</p>	<p>ILBANK PMU; PIUs</p>
ESS 2: LABOR AND WORKING CONDITIONS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Maintain and implement Project 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 Project LMP into bidding documents of contractors. Obligate awarded contractors to adopt Project LMP (including Code of Conduct).</p> <p>Obligate contractors to take responsibility for adherence to LMP by their subcontractors.</p> <p>Obligate contractors to carry out due diligence procedure to identify if there are significant risks that the suppliers are exploiting child or forced labor or exposing worker to serious safety issues</p>	Implement and monitor implementation of LMPs throughout Project implementation.	ILBANK PMU shall be responsible and shall cause the PIUs and their contractors to carry out.
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Adjust, maintain, and operate an accessible GM for Project workers as described in the LMP, in line with national labour law and consistent with ESS2.</p> <p>The ILBANK PMU and the PIUs shall ensure that Project Workers using this GM shall not be subject to any form of discrimination or repression by employers and that it includes measures to deal with SEA/SH complaints.</p>	<p>Grievance mechanism operational within 60 days following Loan Effectiveness and maintained throughout Project implementation.</p> <p>Report semi-annually through Project Progress Reports</p>	ILBANK PMU shall be responsible and shall cause the PIUs and their contractors to carry out.
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Prepare, adopt, and implement OHS measures specified in ESIA, ESMPs and LMP.</p>	After Loan effectiveness, and before commencement of any civil works, maintained throughout Project implementation	ILBANK PMU shall be responsible and shall cause the PIUs and their contractors to carry out.
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Develop, adopt, and implement Waste Management Plans, if required, under the sub-project-specific ESIA and ESMPs to be prepared under action 1.2 above.</p>	Preparation and disclosure of sub-project specific Environmental and Social Assessment (ESA) documents (ESIA and ESMPs) prior to tendering of works for each sub-project, and implementation throughout the period of Project implementation.	ILBANK PMU, to be responsible for supervising and monitoring the preparation, disclosure, and implementation of subproject specific instruments.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
			The PIUs to be responsible for the development, disclosure, and implementation of sub-project specific environmental and social plans and instruments for the subprojects.
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Resource efficiency and pollution prevention and management shall be covered under the ESMPs to be prepared under action 1.2 above and might include the development of site-specific sub-management plans, such as Resource Management Plan, as relevant.</p>	<p>Preparation and disclosure of sub-project specific ESA documents (ESIAs and ESMPs) prior to tendering of works for each sub-project</p> <p>Application of mitigation measures contained in the ESIAs and ESMPs throughout Project implementation.</p>	<p>ILBANK PMU, shall be responsible for supervising and monitoring the preparation, disclosure, and implementation of subproject specific instruments.</p> <p>The PIUs to be responsible for the development, disclosure, and implementation of sub-project specific environmental and social plans and instruments for the subprojects</p>
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Adopt and implement measures and actions to assess and manage traffic and road safety risks through Traffic Management Plans as required in the sub-project specific ESIAs and ESMPs to be developed under action 1.2 above.</p>	<p>Preparation and disclosure, of sub-project specific ESIAs and ESMPs prior to tendering of works for each sub-project.</p> <p>Ensuring adherence to ESIAs and ESMPs throughout Project implementation.</p>	ILBANK PMU shall be responsible and shall cause the PIUs to carry out.
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>As part of the ESMF specified in 1.2 above, prepare, adopt, and implement measures to assess and manage specific risks and impacts to the community arising from Project activities that may generate from behaviour of Project workers; risk of labor influx, Gender Based Violence (GBV)/ Sexual Exploitation and Abuse-Sexual Harassment (SEA-SH) risks , emergency situations, limitations on land, potential for community exposure to communicable diseases, dust and noise; and include these measures in the ESIAs and ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Bank.</p>	Preparation ESIAs/ ESMPs prior to tendering of works for each sub-project, and implementation throughout the period of Project implementation.	ILBANK PMU shall be responsible and shall cause the PIUs to carry out.

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	Include these measures in the ESIA, ESMPs/ESMP checklists to be prepared in accordance with the ESMF, in form and substance acceptable to the Bank.		
4.3	<p>SECURITY PERSONNEL</p> <p>Assess, develop and implement measures and actions in ESIA and ESMPs to manage any risks of human security in Project-affected communities and to Project workers that could arise from the use of security personnel. Measures to be consistent with the requirements of ESS4, in a manner acceptable to the Bank.</p>	Prior to commencement of civil works and implemented throughout Project implementation.	ILBANK PMU shall be responsible and shall cause the PIUs to carry out.
4.4	<p>COMMUNITY TRAINING AND SENSITIZATION</p> <p>The ILBANK shall develop awareness activities as part of the ESMF and the ESIA reports, ESMP/ESMP checklists for the local populations surrounding the work sites in order to raise their awareness of the risks and mitigate the impacts of the Project activities.</p>	Prior to the commencement of civil works and throughout Project implementation	ILBANK PMU shall be responsible and shall cause the PIUs and their contractors to carry out.
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT PLANS</p> <p>Implement, the Resettlement Framework (RF) for the Project, in a manner acceptable to the Bank.</p> <p>Prepare, adopt, and implement Resettlement Plans (RPs) or, where necessary and with agreement by the Bank, Ex-Post Social Audits in accordance with ESS 5 and consistent with the requirements of the RF that has been prepared for the Project, and thereafter adopt and implement the RPs if needed, in a manner acceptable to the Bank.</p> <p>Ensure that no civil works commence unless relevant compensation for the affected assets has been delivered to project-affected persons and RP provisions are implemented accordingly.</p>	RPs and Ex-Post Social Audit shall be submitted to the Bank for approval and once approved, the RPs shall be implemented before commencement of any civil works for the Project activities that involve land acquisition and resettlement.	ILBANK PMU shall be responsible and shall cause the PIUs to carry out.
5.2	<p>GRIEVANCE MECHANISM (GM)</p> <p>Ensure sub-project RPs describe GM for physical and economic displacement due to land acquisition, in line with GM defined in relevant SEPs.</p>	Prior to implementation of any Resettlement Plan of sub-projects.	ILBANK PMU shall be responsible and shall cause the PIUs, and their contractors, to carry out
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Include in all site specific ESIA/ESMP with the potential impacts on natural habitats and supporting flora and fauna species, a site biodiversity assessment and, as needed, and relevant mitigation and monitoring activities in the ESMP documents. Exclude from financing all activities that might have impacts on Critical Natural Habitats.</p>	Preparation, disclosure, and approval (by the Bank) of ESIA's and ESMPs and BMPs, as required, prior to tendering of works for each sub-project.	ILBANK PMU shall be responsible and shall cause the PIUs to carry out
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES [See examples of possible actions below, if determined that ESS7 is relevant]			
7.1	<p>INDIGENOUS PEOPLES PLAN</p> <p>Not applicable.</p>		
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS</p> <p>Prepare, adopt, and implement the chance finds procedure described in the sub-project-specific ESIA's and ESMPs developed for the Project under action 1.2 above. Chance Finds Procedure is included into all civil works contracts and contractors are obligated to adhere.</p>	Preparation, disclosure, and approval (by the Bank) of ESIA's and ESMPs prior to tendering of works for each sub-project.	ILBANK PMU shall be responsible and shall cause or ensure the PIUs, respective civilian authority, or Museum Directorate, or Ministry of Culture and Tourism to carry out.
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	<p>ESMS</p> <p>Prepare, adopt, and maintain an environmental and social management system (ESMS).</p>	ESMS to be established by the Loan Effective date. Once established, the ESMS is maintained and operated throughout Project implementation.	ILBANK
9.2	<p>FI ORGANIZATIONAL CAPACITY</p> <p>Establish and maintain an organizational capacity and competency for implementing the ESMF and RF with clearly defined roles and responsibilities described under action 1.1.</p>	All defined experts are appointed after Loan Effectiveness date.	ILBANK
9.3	<p>SENIOR MANAGEMENT REPRESENTATIVE</p> <p>Designate and maintain a senior management representative to have overall accountability for environmental and social performance of FI sub-projects.</p>	Prior to Project effectiveness and maintained throughout Project implementation.	ILBANK

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ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Update, adopt, and implement Project’s Stakeholder Engagement Plan (SEP).</p> <p>As per project’s SEP prepare, disclose, adopt, and implement sub-project specific SEPs.</p>	<p>ILBANK’s SEP - implemented throughout Project life.</p> <p>Sub-project SEPs prepared, disclosed and finalized prior to finalization of bidding processes for respective sub-projects.</p>	<p>ILBANK PMU shall be responsible and shall cause the PIUs to carry out.</p>
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Develop, adopt, maintain and operate a grievance mechanism, as described in the SEP.</p> <p>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>Assign staff to manage and monitor project grievances.</p> <p>Ensure similar GM is established at municipal and contractor level.</p> <p>Ensure timely resolution, response and reporting of grievances for each sub-project.</p>	<p>ILBANK Level - Prior to Loan effectiveness</p> <p>Municipal Level- within 30 days from signing sub-loan agreement between ILBANK and Municipality</p> <p>Contractor Level – Within 30 days from signing of the respective contract between Municipality/utility and Contractor</p> <p>Reporting – Semi-annually in progress reports.</p>	<p>ILBANK PMU shall be responsible and shall cause the PIUs to carry out.</p>
CAPACITY SUPPORT (TRAINING)			
CS1	<p>PIUs staff to be trained by ILBANK PMU on E&S requirements (including implementation, monitoring and reporting of ESIA’s, ESMPs, SEPs, LMP) of the Bank.</p>	<p>Relevant Trainings shall be given throughout the project implementation at necessary steps/stages of the project activities.</p> <p>Refresher trainings at least once a year or as needed, during Project implementation.</p>	<p>ILBANK PMU</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, environmental 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 sexual exploitation and abuse/ sexual harassment (SEA/SH).</p>	<p>Prior to commencing works, followed by a minimum one annual refresher training.</p>	<p>Contractors (responsible for training)</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
			ILBANK PMU (responsible for confirming that training acceptable to ILBANK and the Bank has been completed) PIUs