

**Republic of Türkiye  
Ministry of Environment, Urbanization and  
Climate Change**

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

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

**June 2022**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Türkiye (the Borrower), through its Ministry of Environment, Urbanization and Climate Change (MoEUCC), shall implement Parts 1, 2, 4.A, and 5 of the Türkiye Climate and Disaster Resilient Cities Project (P173025) (the Project), through MoEUCC's General Directorate of Infrastructure and Urban Transformation Services (GDIUTS), in close cooperation with the Ministry of Treasury and Finance (MoTF) and Strategy and Budget Presidency (SBP), and with the involvement of the local authorities of the provinces of Izmir, Istanbul, Manisa, Tekirdağ and Kahramanmaraş, 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, through MoEUCC, 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, through MoEUCC, 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, 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 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 MoEUCC, 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 MoEUCC, 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 GDIUTS in the MoEUCC, copied to the MoTF. The Borrower, through MoEUCC, 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).</p> <p>Include frequency and content of monitoring reports in the Project Operations Manual and implement accordingly.</p>	<p>Quarterly (every three months) throughout the Project implementation.</p> <p>Preparation of the POM shall be an effectiveness condition for the Loan Agreement.</p>	MoEUCC Project Management Unit (PMU)
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, inter alia, 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.</p>	MoEUCC PMU
C	<p><b>CONTRACTORS’ MONTHLY REPORTS</b></p> <p>Require contractors and PMU E&amp;S specialists, in coordination with the supervision consultancy firm hired by MoEUCC to be responsible for environmental and occupational health and safety (OHS) issues, to</p>	<p>Submit monthly reports throughout Project implementation.</p>	MoEUCC PMU

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>provide monthly monitoring reports on ESHS performance in accordance with the ESHS metrics specified in the respective contracts, and submit such reports to the Bank.</p>		
<p><b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b></p>		
<p>1.1 <b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain a PMU under the General Directorate of Infrastructure and Urban Transformation Services (GDIUTS) with qualified staff and resources to support management and monitoring of E&amp;S risks, acceptable to the Bank, as follows:</p> <ul style="list-style-type: none"> <li>• MoEUCC shall establish and maintain a PMU under GDIUTS with qualified staff and resources to support management of ESHS risks and impacts of the Project by hiring or assigning the following specialists to work in the head office of GDIUTS:                             <ul style="list-style-type: none"> <li>○ one environmental specialist to address environmental risks and impacts under the province-based Environmental and Social Management Plans (ESMPs), site-specific ESMP checklists, other sub-management plans, and (if needed) neighborhood level Environmental and Social Impact Assessment (ESIA) reports;</li> <li>○ one social expert to address social risks and impacts under province-based ESMPs, (if needed) neighborhood level ESIA reports, land acquisition, labor issues, stakeholder engagement, and grievance redress;</li> <li>○ one stakeholder/community engagement specialist to address stakeholder engagement and grievance mechanism issues under the Stakeholder Engagement Plan (SEP); and</li> <li>○ one OHS specialist to address OHS risks and impacts under province-based ESMPs, other sub-management plans, and (if needed) neighborhood level ESIA reports</li> </ul> </li> </ul>	<p>Establish and maintain a PMU throughout Project implementation and hire or assign qualified staff for key positions as set out in the Loan Agreement no later than 60 days after the Effective Date of the Loan Agreement. All designated staff will serve for the duration of the Project.</p>	<p>MoEUCC PMU</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<ul style="list-style-type: none"> <li>MoEUCC shall mobilize one Environmental Specialist and one Social Specialist to work in the office to be established at each of the provincial directorates in the Project provinces of Izmir, Manisa, Tekirdağ, Kahramanmaraş, İstanbul European side and İstanbul Asian side as part of the PMU to support monitoring of E&amp;S risks. These E&amp;S staff shall be responsible for the implementation, management and monitoring of the ESF and relevant E&amp;S instruments.</li> </ul> <p>Ensure that the above-mentioned staff remain on assigned duty for the Project until the end of Project implementation.</p> <p>Other environmental and social consultants may be hired to support the PMU as and when necessary.</p> <p>Hire a supervision consultancy firm (with experience, qualifications, and terms of reference acceptable to the Bank) for the supervision of the environmental and OHS issues associated with the implementation of the Project's construction activities.</p>	<p>The supervision consultancy firm shall be hired before the commencement of construction works and retained, as needed throughout Project implementation.</p>	
<p>1.2 <b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <p>a. Prepare, consult, adopt, disclose, and thereafter implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p>	<p>a. Draft ESMF disclosed before appraisal. Submit the final ESMF for the Bank's prior review and no objection; adopt and disclose the final ESMF no later than the Effective Date of the Loan Agreement, and thereafter implement the ESMF throughout Project implementation.</p>	<p>MoEUCC PMU</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>b. Prepare, consult, adopt, disclose, and thereafter implement Project SEP, Labor Management Procedures (LMP), and other E&amp;S instruments, as necessary, including a Waste Management Plan (WMP), Asbestos Management Plan (AMP), Chance Find Procedure and Occupational Health and Safety Management Plan (OHSMP) in a manner acceptable to the Bank before initialization of general implementation of Part 2 of the Project. Prepare, consult, adopt, disclose, and thereafter implement province-based ESMPs, Resettlement Plans (RPs) and Community Safety and Traffic Management Plan (CSTMP) in a manner acceptable to the Bank before commencing the implementation of Part 2 of the Project. Screen any proposed subproject in accordance with the ESMF and province-based ESMPs adopted for the Project and identify and prepare or ensure contractors to prepare relevant environmental and social assessment &amp; management tools (including ESMP checklists). In the event that more than 10 sub-projects are initialized in the same neighborhood within a one-month period, prepare, consult, adopt, disclose, and thereafter implement a neighborhood level ESIA. The proposed activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</p> <p>c. Conduct E&amp;S audits for eligible Type II sub-projects (as defined in the ESMF and RF), as and when necessary prior to the commencement of retrofitting. Conduct E&amp;S Audits before commencing the reconstruction of eligible Type III sub-projects, as defined in the ESMF (the buildings that have already been demolished after being registered as risky structures prior to October 1, 2020). Prepare Environmental and Social Action Plans, based on findings of the E&amp;S Audits, as and when needed. The action plans will include relevant environmental and social corrective measures, as defined in the ESMF and RF.</p>	<p>b. Submit the respective Project and province-based ESMPs, and other E&amp;S management plans for the Bank’s prior review and no objection; thereafter, adopt, and disclose the province-based ESMPs before commencing the implementation of Part 2 of the Project. After screening, if required, submit neighborhood level ESIA for the Bank’s prior review and no objection, and thereafter adopt, and disclose prior to the commencement of the related works. Once adopted, implement the province-based ESMPs, other relevant environmental and social plans, and, if required, neighborhood ESIA throughout Project implementation.</p> <p>c. E&amp;S Audits shall be performed by qualified specialists of the PMU in the provinces before commencing the reconstruction of Type III subprojects. The corrective actions, if any, as defined in Environmental and Social Action Plans shall be implemented before the start of related reconstruction activities under overall responsibility of the PMU.</p>	
<p>1.3 <b>MANAGEMENT OF CONTRACTORS</b></p>		<p>MoEUCC PMU</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>a. Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&amp;S instruments, the LMP and code of conduct, into the ESHS specifications of the contracts with contractors and the supervision consultancy firm responsible for environmental and OHS issues to be hired by MoEUCC Thereafter ensure that the contractors and supervision consultancy firm responsible for environmental and OHS issues hired by MoEUCC comply, and cause subcontractors to comply, with the ESHS specifications of their respective contracts.</p> <p>b. Obligate contractors to assign one focal point for managing issues related to E&amp;S and stakeholder engagement and grievance mechanism and another focal point for managing OHS risks of sub-projects through including this obligation into the contracts that homeowners will sign with the contractors. Ensure contractors maintain these staff throughout the life of their contracts.</p> <p>c. Ensure contractors prepare and implement sub-project specific Environmental and Social Management Plan Checklists that covers the impacts and related mitigation approaches associated with the works, by taking the risk category of the eligible sub-project and the extent and significance of its impacts, province-based ESMPs, and the ESMF into account. Sub-ESMP checklists will be reviewed by the Bank initially to ensure that the level of detail is sufficient. The sub-ESMP checklists shall be subject to PMU review and approval.</p> <p>d. Ensure contractors comply and implement national OHS and environmental legislation and ESMP checklists.</p>	<p>a. Prior to the signing of contract with the Contractors.</p> <p>b. Supervise contractors throughout Project implementation.</p> <p>c. Environmental and Social Management Plan Checklists shall be submitted to the PMU for review and approval. The first three moderate risk and the first three substantial risk sub-projects per province shall be submitted to the Bank for review and no-objection.</p> <p>d. Supervise contractors throughout Project implementation.</p>	
<p>1.4 <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 and are consistent with the ESSs.</p>	<p>The technical assistance activities are carried out consistent with the ESSs throughout Project implementation.</p>	<p>MoEUCC PMU</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.5 <b>CONTINGENT EMERGENCY RESPONSE FINANCING</b></p> <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, in accordance with the ESSs.</p> <p>b) Prepare, consult, adopt, and disclose any E&amp;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&amp;S instruments, within the timeframes specified in said E&amp;S instruments.</p>	<p>a. The adoption of 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&amp;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&amp;S instrument is required. Implement the E&amp;S instruments in accordance with their terms, throughout Project implementation.</p>	<p>MoEUCC PMU</p>
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>		
<p>2.1 <b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Prepare, consult, adopt, disclose, and implement the 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 and subcontractors, including consultancy firms to be hired by MoEUCC.</p>	<p>Draft LMP disclosed before appraisal. Submit the final LMP for the Bank’s prior review and no objection, adopt, and disclose the final LMP no later than the Loan Effective date, and thereafter implement the LMP throughout Project implementation.</p>	<p>MoEUCC PMU</p>
<p>2.2 <b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	<p>Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.</p>	<p>MoEUCC PMU</p>
<p>2.3 <b>PROJECT WORKERS TRAINING</b></p>		<p>MoEUCC PMU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<p>Implement training of Project Workers designed to heighten awareness of OHS risks and the requirement included at the LMP (including workers' Code of Conduct).</p> <p>Require Contractor(s) to deliver training of contracted workers to raise awareness about their rights and obligations consistent with Project LMP.</p>	<p>At least once over the duration of the contract.</p> <p>Refresher trainings at least once a year or as needed, during Project implementation.</p>	
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>WASTE MANAGEMENT PLAN</b></p> <p>Prepare, consult, adopt, disclose, and implement a Waste Management Plan (WMP), and an Asbestos Management Plan (AMP) consistent with ESS3.</p>	<p>Submit the WMP and AMP for the Bank's prior review and no objection, adopt, and disclose the WMP prior to the commencement of works and thereafter implement the WMP throughout Project implementation.</p>	MoEUCC PMU
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Incorporate resource efficiency and pollution prevention and management measures in the province-based ESMPs to be prepared under action 1.2 above. Prepare and adopt Resource Efficiency and Pollution Prevention Plans for each province consistent with ESS3.</p>	<p>Prior to the commencement of works for each province and thereafter implement throughout the Project.</p>	MoEUCC PMU
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>Adopt and implement measures to manage traffic and road safety risks as required in the province-based ESMPs to be developed under action 1.2 above. Prepare and adopt a Community Safety and Traffic Management Plan for each province.</p>	<p>Prior to the commencement of works for each province and thereafter implement throughout the Project.</p>	MoEUCC PMU
4.2	<p><b>COMMUNITY HEALTH AND SAFETY</b></p> <p>Assess and manage specific risks and impacts to the community arising from Project activities, and include mitigation measures in the province-based ESMPs to be prepared in accordance with the ESMF. Prepare and adopt a Community Safety and Traffic Management Plan for each province.</p>	<p>Prior to the commencement of works for each province and thereafter implement throughout the Project.</p>	MoEUCC PMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.3	<p><b>SECURITY MANAGEMENT</b></p> <p>Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, guided by the principles of proportionality and good international industry practice (GIIP), and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.</p>	Prior to engaging security personnel and thereafter implemented throughout Project implementation.	MoEUCC PMU
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<p><b>RESETTLEMENT FRAMEWORK</b></p> <p>Prepare, consult, adopt, disclose, and implement a Resettlement Framework (RF) for the Project, consistent with ESS5.</p>	Draft RF disclosed before appraisal. Submit the final RF for the Bank’s prior review and no objection, adopt, and disclose the updated RF no later than the Loan Effective date, and thereafter implement the RF throughout Project implementation.	MoEUCC PMU
5.2	<p><b>RESETTLEMENT PLANS</b></p> <p>Prepare, consult, adopt, disclose, and implement RPs for each activity or for each province with addenda for each building or neighborhood under the Project for which the RPF requires such RAP, as set out in the RPF, and consistent with ESS5.</p> <p>MoEUCC to engage an independent social consultant to review the resettlement aspects, with a focus on outcomes for vulnerable tenants and superintendents, per terms of reference acceptable to the Bank.</p>	<p>Submit the respective RP for the Bank’s prior review and no objection, adopt, and disclose the RP, and once adopted, implement the respective RP, including providing compensation and assistance prior to the commencement of demolition or reconstruction and/or retrofitting works.</p> <p>Independent review to be completed before the mid-term review of the project.</p>	MoEUCC PMU
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p><b>BIODIVERSITY RISKS AND IMPACTS</b></p>		MoEUCC PMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	Incorporate management measures for the risks and impacts that indirectly affect biodiversity and the ecosystem into the province-based ESMPs to be prepared under action 1.2 above.	Prior to the commencement of works and thereafter implemented throughout the Project.	
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES – Not Relevant</b>			
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<b>CHANCE FINDS</b>  Describe and implement the chance finds procedure, as part of the ESMF of the Project.	Same timeframe as for the adoption and implementation of the province-based ESMPs.	MoEUCC PMU shall be responsible for monitoring the procedures to be carried out by the respective civilian authority, or Museum Directorate, or Ministry of Culture and Tourism.
<b>ESS 9: FINANCIAL INTERMEDIARIES – Not Relevant for Project Components implemented by MoEUCC. See the ESCP for ILBANK.</b>			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b>  Prepare, consult, adopt, disclose, and implement an 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. This shall include measures to consult the E&S instruments for the Project.	Draft SEP disclosed before appraisal. Submit the final SEP for the Bank’s prior review and no objection, adopt, and disclose the final SEP no later than the Loan Effective date, and thereafter implement the SEP throughout Project implementation.	MoEUCC PMU
10.2	<b>PROJECT GRIEVANCE MECHANISM</b>  Establish, publicize, maintain, and operate an accessible 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.	Establish the grievance mechanism no later than the Loan Effective date, and thereafter maintain and operate the mechanism throughout Project implementation.	MoEUCC PMU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	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.		
<b>CAPACITY SUPPORT</b>			
CS1	<p>Training may be required for the PMU, 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>• OHS</li> <li>• stakeholder mapping and engagement</li> <li>• specific aspects of environmental and social assessment</li> <li>• emergency preparedness and response</li> <li>• community health and safety.</li> </ul>	<p>Initial training no later than 60 days after the mobilization of the PMU specialists and before start of Project activities related to the housing sub-loans (Component 2).</p> <p>Refresher trainings at least once a year or as needed, during Project implementation.</p>	MoEUCC PMU
CS2	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, contractual environmental and social requirements, , Contractor ESMP Checklist, Code of Conduct, labor requirements for primary suppliers, COVID-19 specific LMP measures, and diverse and respectful workplaces, free of SEA/SH.	Prior to commencing works, followed by a minimum one annual refresher training.	Contractors (responsible for training) MoEUCC PMU