

Republic of Turkey

Turkey Organized Industrial Zones Project

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

December 18, 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Turkey, through its Ministry of Industry and Technology (MoIT), shall implement the Turkey Organized Industrial Zones Project (the **Project**). The International Bank for Reconstruction and Development (hereinafter the Bank) has agreed to provide financing for the Project.
2. The MoIT shall 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. The MoIT shall also comply with the provisions of any other environmental and social (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 Action Plans (RAPs), Labor Management Procedures (LMP), and a Stakeholder Engagement Plan (SEP), and other specific mitigation plans as per the timelines specified in those E&S documents.
4. The MoIT is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the parties involved in the project.
5. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Bank by the MoIT as required by the ESCP and the conditions of the legal agreement, and the Bank shall monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Bank and the Republic of Turkey, through 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, the Government of Turkey shall agree to the changes with the Bank and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Bank and the MoIT. The MoIT shall disclose the updated ESCP in the shortest possible time.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, MoIT shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, land acquisition/resettlement related or labor risks.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit regular monitoring reports on 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, functioning of the grievance mechanism(s).</p> <p>Ensure frequency and content of monitoring reports is detailed in the Project Operations Manual and implemented accordingly.</p>	<p>Starting ninety (90) days after the Effective Date of the Loan and then quarterly (every three (3) months) throughout Project implementation.</p> <p>No later than the Effective Date of the Project.</p>	MoIT
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 and workers such as Occupational Health and Safety (OHS) accidents or that result in threatening community health and safety.</p> <p>Provide sufficient detail regarding the incident or accident, findings 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. Ensure the incident report is in line with the 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>Include in bidding documents of contractors that prompt notification of accident and incidents remain inclusive under contractor's Environmental and Social Management Plan (ESMP). Ensure and monitor that an incident register at all construction sites are kept by the contractors throughout the Project life.</p>	<p>MoIT shall obligate the Organized Industrial Zones (OIZ) concerned to report to the MoIT the details of any significant environmental or social incidents (e.g., fatalities, lost time incidents, environmental spills, etc.) within 48 hours after the occurrence of the incident or accident, and MoIT shall immediately notify the Bank upon receipt of such notification. MoIT shall obligate the OIZ concerned to submit to MoIT an incident report, including root cause analysis, precautions and compensation measures taken within 30 business days of the incident. MoIT shall forward the incident report to the Bank immediately upon receipt from the OIZ.</p>	MoIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
C	<p>CONTRACTORS QUARTERLY REPORTS</p> <p>Obligate OIZs to produce monthly 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>	Starting thirty (30) days after the receiving withdrawal of the Loan financing and then monthly throughout the Project implementation.	MoIT

ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Ensure that a Project Implementation Unit (PIU) is established and staffed with qualified staff to support management and monitoring of E&S risks by appointing one social, one environmental, one OHS specialist and one stakeholder engagement (SE) specialist, who are responsible for full compliance with the ESF and relevant instruments.</p> <p>Maintain the structure of the complete PIU throughout Project implementation.</p> <p>Obligate OIZs to assign E&S, OHS and SE/GRM focal points for management of sub-projects' E&S risks.</p> <p>Obligate contractors to assign E&S, OHS and SE/GRM focal points for sub-projects' E&S risk management by including this requirement in the bidding documents for works.</p>	<p>Strengthen the capacity of the PIU, by hiring one (1) environmental, one (1) social, one (1) OHS and one (1) stakeholder engagement specialist by the Effective Date of the Loan.</p> <p>All designated PIU staff positions for the Project shall be retained for the duration of the Project.</p> <p>Throughout project implementation</p>	MoIT

<p>1.2</p>	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>Finalize and implement the existing Environmental and Social Management Framework (ESMF) for the Project, in a manner acceptable to the Bank.</p> <p>Prior to the approval of any OIZ investments or subprojects under this Project, MoIT shall carry out environmental and social screenings of the related OIZs. Based on the results of the screening for the OIZ concerned, and where required by the Bank, the MoIT shall undertake Environmental and Social Due Diligence for the respective investment or subproject.¹ The Environmental and Social Due Diligence shall include a systematic review and assessment of the respective OIZ's performance in addressing environmental and social risks and impacts, and ensure that any issues that may negatively affect the natural environment, habitats, communities within the scope of the investment or subproject are avoided, minimized or remedied/mitigated through appropriate actions. Where significant residual impacts remain, the MoIT shall compensate for or offset them where technically and financially feasible.</p> <p>Following the screening and Environmental and Social Due Diligence, and in accordance with the ESMF prepared for the Project, prepare, disclose, consult upon, adopt and implement the sub-project specific Environmental and Social Impact Assessments (ESIAs), ESMPs and Resettlement Action Plans (RAPs) as per the guidelines/requirement accordance with ESMF and Resettlement Framework (RF), disclose and consult in form and substance acceptable to the Bank.</p> <p>Include provisions for E&S tasks and instruments in tender documents and contract requirements so that detailed design tasks reflect phasing for activities such as the ESMPs and RAPs.</p> <p>Prepare, disclose, consult and adopt ESF documents for any associated facilities (electricity transmission lines, water purification), as confirmed by the final detailed design.</p>	<p>An ESMF, in form and substance acceptable to the Bank, shall be publicly consulted on, finalized, adopted and publicly disclosed before January 20, 2021 (i.e., five (5) days before the expected date for consideration of the Project by the Bank's Board of Executive Directors (Board)); in the event that the said Board date is changed, the said consultation, finalization and disclosure of the ESMF shall be no later than five (5) days before such revised date for Board consideration.</p> <p>MoIT shall (a) submit to the Bank the review or assessment undertaken by the Environmental and Social Due Diligence process for the Bank's prior review, and (b) approve of the related investment or subproject only after receiving the Bank's no-objection.</p> <p>ESIAs, ESMPs and RAPs – to be prepared and disclosed prior to tendering of works for each sub-project and thereafter implemented in a manner acceptable to the Bank.</p> <p>Sixty (60) days from the date of receipt of the full package of the draft detailed engineering/technical design of OIZ subproject investments under the Project, and prior to the finalization of respective tender documents of subprojects.</p> <p>After the finalization of the detailed engineering/technical design, and before the start of the construction.</p>	<p>MoIT</p> <p>MoIT</p> <p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the ESMF)</p> <p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the ESMF)</p> <p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the ESMF)</p>
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	Ensure that the requirements of the ESF are integrated into the terms of reference (ToRs) to be prepared for each feasibility study.	ToRs shall be approved by the Bank prior to tendering of feasibility studies.	MoIT
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including the requirement to comply with ESIA, ESMPs, RAPs, and Labor Management Procedures (LMPs), into the ESHS requirements of the procurement documents to ensure that the requirement to produce Contractor’s ESMP (based on ESIA and ESMPs produced as per the ESMF), RAP, Labor Grievance Mechanism (GM) for Contractor’s personnel, and ESHS Code of Conduct are included into bidding documents for civil works contracts. Thereafter, ensure that the contractors comply with the ESHS requirements of their respective contracts.</p>	<p>After finalization of the detailed/technical engineering design for the investments and financing, prior to the finalization of the respective tender documentation.</p> <p>Supervise contractors throughout the Project implementation.</p>	<p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the ESMF)</p> <p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the ESMF)</p>
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>. Finalize and implement Labor Management Procedures (LMP) and ensure that Project workers are informed of and have access to these procedures. Update LMP, as needed.</p> <p>Obligate the Contractors to adopt and implement contractors’ labor management procedures, including OHS measures as detailed in the LMP and ESMPs.</p>	<p>LMP, in form and substance acceptable to the Bank, shall be publicly consulted on, finalized, adopted and publicly disclosed before January 20, 2021 (i.e., five (5) days before the expected date for consideration of the Project by the Bank’s Board); in the event that the said Board date is changed, the said consultation, finalization and disclosure of the ESMF shall be no later than five (5) days before such revised date for Board consideration. The LMP shall be maintained and implemented throughout Project implementation. Before the start of the civil works and throughout Project implementation.</p>	<p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the LMP and ESMF)</p> <p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the LMP and ESMF)</p>

¹ “Environmental and Social Due Diligence” means (a) the systematic identification, quantification and assessment or evaluation of environmental and social risks and impacts associated with a proposed transaction, and (b) the proposed measures for remedying and/or mitigating the identified risks and impacts, or compensating and/or offsetting those risks where feasible in accordance with the requirements of the Bank’s Environmental and Social Framework.

2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate grievance mechanisms (GM) for direct workers and obligate contractors to provide GM for contracted workers, including a mechanism to address sexual exploitation and abuse (SEA) and sexual harassment (SH) grievances.</p> <p>Monitor implementation of the Project workers' GM, maintain a GM log, and report on Project workers' grievances</p>	<p>Grievance mechanism established not later than 30 days after the Effective Date of the Project, prior to the recruitment of any Project workers, and thereafter maintained throughout Project implementation.</p> <p>Report on Project workers' GM implementation activities in regular quarterly reports as required in Section A of this ESCP.</p>	<p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the LMP and ESMF)</p> <p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the LMP and ESMF)</p>
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Where assessed as necessary, implement measures of protection at work and safety for jobs with increased risk of injury and damage to health, as well as organization of training for workers in such jobs.</p> <p>Ensure all Contractors adopt and implement OHS measures as detailed in LMPs and ESMPs.</p>	<p>Throughout Project implementation.</p> <p>Throughout project implementation</p>	<p>MoIT MoIT (as appropriate, shall cause OIZs to carry out in accordance with the ESMF and LMP)</p> <p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the LMP and ESMF)</p>

ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</p> <p>Include measures to prevent and/or minimize environmental pollution during construction and operation into Contractors' individual ESMPs (including development of necessary management plans, as appropriate) following guiding principles of the ESS 3, sub-project specific ESAs and ESMPs to be prepared under action 1.2 above, and the WBG EHS Guidelines, and duly applied.</p>	<p>Prepare and disclose sub-project specific ESA documents (ESAs and ESMPs) prior to tendering of works for each sub-project and implement thereafter.</p> <p>Apply mitigation measures throughout Project implementation.</p>	<p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the ESMF)</p> <p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the ESMF)</p>

ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY: 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 ESIA and ESMPs to be developed under action 1.2.</p> <p>Ensure these measures are included into Contractors' ESMPs following guiding principles of the ESMF duly applied.</p>	<p>Prepare and disclose, ESIA and ESMPs, in a form and substance acceptable to the Bank, prior to tendering of works for each sub-project.</p> <p>Ensure adherence to ESIA and ESMPs throughout the Project</p>	<p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the ESMF)</p> <p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the ESMF)</p>
4.2	<p>COMMUNITY HEALTH AND SAFETY: Adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from Project activities and ensure these measures are included in Contractor's sub management plans, in line with sub project specific ESMPs and in form and substance acceptable to the Bank.</p>	<p>Prior to commencement of civil works and throughout the Project implementation</p>	<p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the ESMF)</p>
4.3	<p>Detailed design and Contractor's individual ESMPs shall assess / analyse emergencies risks and outline mitigation measures to address these risks.</p> <p>Ensure that design of new public access buildings and facilities consider life & fire safety design requirements as specified by the WBG General EHS guidelines.</p> <p>Ensure that design and construction of investments that require new buildings and facilities consider universal access concept.</p>	<p>After finalization of technical designs of investments and financing, prior to the preparation of procurement documents.</p>	<p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the ESMF)</p>

ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT

<p>5.1</p>	<p>RESETTLEMENT PLANS:</p> <p>Finalize, consult upon, disclose, adopt, and implement Resettlement Framework (RF) in a manner acceptable to the Bank.</p> <p>Prepare sub-project specific Resettlement Plans (RPs)/Ex Post Social Assessment (if necessary) as per the RF, disclose, consult with stakeholders, and implement in a manner acceptable to the Bank.</p> <p>Establish, adopt and implement the RP with arrangements, that allows for the compensation of certain entitlements currently not covered through national legislation.</p> <p>Prepare, adopt, implement RPs (if necessary), for OIZ sub-projects in a manner acceptable to the Bank.</p>	<p>RF, in form and substance acceptable to the Bank, shall be publicly consulted on, finalized, adopted and publicly disclosed before January 20, 2021 (i.e., five (5) days before the expected date for consideration of the Project by the Bank’s Board); in the event that the said Board date is changed, the said consultation, finalization and disclosure of the ESMF shall be no later than five (5) days before such revised date for Board consideration.</p> <p>After finalization of detailed designs of investments, and prior to commencement of civil works.</p> <p>Prior to commencement of any land acquisition activity.</p> <p>Prior to commencement of civil works of sub-projects.</p>	<p>MoIT</p> <p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the ESMF and RF)</p> <p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the ESMF and RF)</p> <p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the ESMF and RF)</p>
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ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES

	<p>Identify, describe and design mitigation measures for biodiversity risks and impacts in the sub-project specific ESIA and ESMPs to be prepared under action 1.2 above.</p>	<p>Prepare and disclose ESIA and ESMPs, in form and substance acceptable to the Bank, prior to tendering of works for each sub-project.</p>	<p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the ESMF)</p>
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ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES

	<p>Currently not relevant to the project</p>		
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ESS 8: CULTURAL HERITAGE			
8.1	<p>Prepare, adopt, and implement the chance finds procedure described in the sub-project specific ESIA and ESMPs developed for the Project under action 1.2 above.</p> <p>Chance Finds Procedure is included into all civil works contracts and contractors are obligate to adhere.</p>	<p>Implement chance find procedures included in the ESIA and ESMPs, in each instance of when a chance find occurs, throughout the implementation of the Project.</p>	<p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the ESMF)</p> <p>Ministry of Culture and Tourism.</p>

ESS 9: FINANCIAL INTERMEDIARIES			
	Not relevant to the project		

ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE:</p> <p>Consult upon, finalize, disclose, maintain and implement a Stakeholder Engagement Plan (SEP) in a manner acceptable to the Bank.</p> <p>Implement SEPs; report on the implementation of all activities in the SEPs.</p>	<p>The SEP, in form and substance acceptable to the Bank, shall be publicly consulted on, finalized, adopted and publicly disclosed before January 20, 2021 (i.e., five (5) days before the expected date for consideration of the Project by the Bank's Board); in the event that the said Board date is changed, the said consultation, finalization and disclosure of the ESMF shall be no later than five (5) days before such revised date for Board consideration.</p> <p>Implement SEPs starting with the Effective Date of the Loan and throughout Project implementation. Report on SEP implementation activities in regular quarterly reports as required in Section A of this ESCP.</p>	<p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the ESMF and SEP)</p> <p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the ESMF and SEP)</p>

10.2	<p>Establish, maintain and operate grievance mechanism (GM) in a manner acceptable to the Bank.</p> <p>Manage, respond to and monitor project grievances.</p>	<p>Grievance mechanism to be established not later than 30 days after the Effective Date and maintained throughout Project implementation.</p> <p>Reporting on received grievances – Quarterly in progress reports throughout the Project implementation.</p>	<p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the ESMF and SEP)</p> <p>MoIT (as appropriate, shall cause OIZs to carry out in accordance with the ESMF and SEP)</p>
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CAPACITY SUPPORT (TRAINING)

CS1	Training shall be required for staff and stakeholders on: <ul style="list-style-type: none">• the World Bank Environmental and Social Framework• preparation of site-specific E&S Instruments• stakeholder mapping and engagement• specific aspects of environmental and social assessment• land acquisition, restrictions on land use and involuntary resettlement• international requirements for tender procedures• SEA /SH and GBV and COVID 19 prevention measures	Within the first year of the Project implementation, before start of the Project activities, and followed by a minimum one annual refresher training	MoIT (as appropriate, shall cause OIZs to carry out) with the support of the Bank
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