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

## ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

16 November 2022  
Updated Version



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## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Directorate General of Development Agencies (DGDA) of The Ministry of Industry and Technology (MoIT) will implement the Social Entrepreneurship Project (the **Project**), with the involvement of the following Development Agencies (covering selected project provinces): Silkroad (Gaziantep, Kilis, Adiyaman), Cukurova (Adana, Mersin), East Mediterranean (Hatay, Kahramanmaras, Osmaniye), Karacadag (Diyarbakir, Sanliurfa) and Tigris (Mardin), and the Community Implementing Partners (CIPs) which will be selected competitively for the project in order to deliver activities under Component 1. The International Bank for Reconstruction and Development (hereinafter the Bank) has agreed to provide financing for the Project as the administrator of funds under the European Union Commission Facility of Refugees in Turkey.
2. MoIT will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. MoIT will also comply with the provisions of:
  - *Environmental and Social Management Framework (ESMF)*;
  - *Labor Management Procedure (LMP)*;
  - *Stakeholder Engagement Plan (SEP)*;
  - *Grievance Mechanism Manual (GM Manual)*;
  - *Gender-Based Violence Action Plan (GBV Action Plan)*and the timelines specified in these documents.
4. MoIT is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by MoIT as required by the ESCP and the conditions of the legal agreement, and the *Bank* will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Bank and MoIT, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, MoIT will agree to the changes with the Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Bank and the MoIT. The MoIT will promptly disclose the updated ESCP.



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7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the MoIT shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.





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<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING:</b>            Prepare and submit regular monitoring reports on the implementation of the ESCP, environmental and social management framework, stakeholder engagement activities, and functioning of the grievance mechanisms (GM).</p>	<p>Starting 180 days after the Effective Date of the Grant Agreement and then semi-annually (every 6 months) throughout the Project implementation.</p>	<p>MoIT PIU. Data will be collected from Development Agencies and through CIPs</p>
B	<p><b>QUARTERLY MONITORING</b>            Maintain and monitor quarterly progress reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to, stakeholder engagement activities and grievances log at all sub-project sites, throughout the duration of the project. Include reporting requirements in bidding documents of CIPs</p>	<p>Quarterly</p>	<p>MoIT, Development Agencies and CIPs</p>



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<p>C</p>	<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 but not limited to; incidents and accidents encountered during construction works if required by sub-projects, environmental spills, etc.</p> <p>Provide sufficient detail regarding the incident or accident, findings of the Root Cause Analysis (RCA), indicating immediate measures or corrective actions taken or that are planned to be taken to address it, compensation paid, and any information provided by any contractor and supervision consultant, as appropriate. Ensure the incident report is in line with the World 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>Specify in the sub-grant manuals and sub-grant agreements that prompt notification of accidents and incidents is mandatory under Project’s ESMF. Ensure that an incident register is kept by the Development Agencies of the MoIT throughout the Project life.</p>	<p>Report details of any significant environmental or social incidents (e.g. fatalities, lost time incidents, environmental spills, occupational health and safety issues, community health and safety issues, community grievances and gender-based violence/harassment related grievances etc.) within 3 business days. Submit an incident report, including root cause analysis, precautions and compensation measures taken within 30 business days.</p>	<p>MoIT, Development Agencies and CIPs</p>
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**ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS**



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<p>1.1</p>	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain a Project Implementation Unit under MoIT with qualified staff and resources to support management and monitoring of E&amp;S risks by appointing 2 designated technical staff:</p> <ul style="list-style-type: none"> <li>• one environmental specialist to implement ESMF, guide preparation and supervise implementation of site specific ESMP checklists,</li> <li>• one social (stakeholder) expert/designated staff for (Grievance Mechanism) GM and stakeholder engagement management and monitoring of the labor management procedures.</li> </ul> <p>Share the Terms of Reference for the Environmental and Social Specialists with the WB team for review and comments;</p> <p>Obligate DAs to assign E&amp;S and SE/GM focal points for management of sub-projects' E&amp;S risks. This obligation to be included as condition of the subsidiary agreements between MoIT and DA and subgrant agreements with municipalities/utilities.</p>	<p>Establish a PIU, including one environmental and one social specialist based on the terms of reference satisfactory to the Bank, before the Effective Date of the Grant Agreement. Retain duly staffed PIU for the duration of the Project.</p>	<p>MoIT</p>
<p>1.2</p>	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>Finalize and disclose and adopt, the Environmental and Social Management Framework (ESMF) for the Project, in form and substance acceptable to the Bank.</p> <p>Include detailed environmental and social risk mitigation measures as described, as relevant, in the ESMF/ESMPs, POM, SEP, LMP, GM Manual and GBV Action Plan in Sub-grant manuals, and bidding documents of contractors.</p>	<p>No later than 30 days after the Effective Date of the Grant Agreement and maintained throughout Project implementation.</p> <p>Before disbursement of grant proceeds for sub-grants and maintained throughout project implementation</p>	<p>MoIT and DAs</p> <p>MoIT and DAs</p>



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1.3	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS</b></p> <p>a. Assess the environmental and social risks and impacts of proposed Project activities in accordance with ESS1 and the Environmental and Social Management Framework (ESMF) to be prepared, disclosed and adopted for the Project. The ESMF will include a template for an Environmental and Social Management Plan Checklist (ESMPs) to be prepared for identified subprojects. Prepare, disclose, adopt, and implement for these subprojects such ESMP Checklist documents.</p> <p>b. Incorporate the relevant aspects of this ESCP, including ESMP Checklists, ESS2 requirements, and any other required ESHS measures, into the ESHS specifications of the procurement documents and contracts with contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts.</p>	<p>a. Prepare ESMP Checklists before the sub-projects, and thereafter implemented throughout the implementation of such activities.</p> <p>b. Before launching the procurement process for the relevant sub-project activities and thereafter ensure that contractors comply with the ESHS specifications in their contracts through their involvement in the respective Project activities.</p>	MoIT
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES:</b> MoIT will finalize, adopt disclose the Labor Management Procedures (LMP). LMP will include age verification procedure.</p>	No later than 30 days after the Effective Date of the Grant Agreement and maintained throughout the Project implementation	MoIT
2.2	<p>The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Bank, including through, inter alia, implementing adequate occupational health and safety measures (including emergency preparedness and response measures and protection measures defined in ESMF and LMP against child labor), and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.</p>	Throughout project implementation	



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2.3	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS:</b> MoIT will establish and operationalize a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. The grievance mechanism will be designed in such way as to enable reporting on any cases of child and forced labour and shall be maintained for the term of the Project. The GM will include a channel to receive and address grievances related to sexual exploitation and abuse (SEA) and sexual harassment (SH).</p>	<p>No later than 30 days after the Effective Date of the Grant Agreement and maintained throughout Project implementation.</p>	<p>MoIT PIU</p>
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b>          Resource efficiency, including for water, electricity and pollution prevention and management measures will be covered under ESMF and included in the sub-project specific ESMP as relevant.</p>	<p>Before the commencement of any civil works as appropriate, throughout Project implementation</p>	<p>MoIT and DAs</p>
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>COMMUNITY HEALTH AND SAFETY:</b>          Ensure grant recipients to be in line with community health and safety measures to be specified in the ESMF document which will be included under the sub-project specific ESMPs to be prepared as relevant.</p>	<p>Before commencement of any civil works as appropriate, throughout Project implementation</p>	<p>MoIT and DAs</p>
4.2	<p>Include strict rules of engagement and code of conduct in ESMF and LMP and ensure that any security personnel, if any, engaged in the civil works associated with the project will follow them and avoid any escalation.</p>	<p>Before commencement of any civil works as appropriate, throughout Project implementation</p>	<p>MoIT and DAs</p>





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4.3	Prepare Action Plan to Prevent Gender-Based Violence	Prepare at the beginning of the Project implementation.  Throughout Project implementation	MoIT PIU
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	Not Relevant to the Project.		
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	Not Relevant to the Project		
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	Not Relevant to the Project		
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	Not Relevant to the Project		
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
9.1	Not Relevant to the Project		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b>  Finalize, disclose, maintain and implement SEP in a manner acceptable to the Bank.	No later than 30 days after the Effective Date of the Grant Agreement and maintained throughout Project implementation	MoIT



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10.2	<p><b>PROJECT GRIEVANCE MECHANISM:</b>          Develop, establish, maintain and operate throughout Project implementation a grievance mechanism, as described in the SEP. Prepare Grievance Mechanism Manual, . setting out separate GM procedures for Project stakeholders (project affected parties and other interested parties) and for Project workers and including measures for managing sensitive grievances. The GM to include a channel to receive and address grievances related to sexual exploitation and abuse (SEA) and sexual harassment (SH).</p> <p>Ensure the GM is maintained throughout Project implementation at DA and also CIP level.</p> <p>Ensure timely reporting of grievances for each sub project to MoIT. Semi-annual reports the World Bank will include reporting on grievances received.</p>	<p>Establish GM not later than 30 days after the Effective Date of the Grant Agreement and implement throughout the Project duration.</p> <p>Report semi-annually in Project progress reports throughout Project implementation.</p>	MoIT PIU
10.3			
10.4	<p><b>INFORMATION DISCLOSURE</b>          Ensure project information disclosure to stakeholders and Project beneficiaries in the relevant local languages and in a manner accessible and culturally appropriate, considering any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs.</p>	Throughout Project implementation	MoIT PIU
<b>CAPACITY SUPPORT (TRAINING)</b>			



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<p>CS 1</p>	<p>As part of Subcomponent 3A, a Consolidated Training Plan, based on the Institutional Capacity Needs Assessment and Action Plan, will be developed and updated annually by MoIT PIU. The training plan will include the training topics, outputs, number and type of participants, duration, dates, required reporting, and budget. It will be adapted throughout the project to suit the emerging needs of staff and consultants engaged on the project.</p> <p>Specific technical trainings, including environmental and social sustainability, community engagement, vulnerable communities, forced displacement would be included as advised by the Bank’s Task Team.</p>	<p>During Year 1 of Project implementation.</p>	<p>MoIT PIU</p>
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