

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

**Türkiye PMI Carbon Market Development
Project
(P180248)**

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

March 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Türkiye (hereinafter the Recipient) shall implement the Türkiye PMI Carbon Market Development Project (the Project), through Directorate of Climate Change, hereafter known as DoCC, acting under the authority and auspices of the Recipient's Ministry of Environment, Urbanization and Climate Change (MoEUCC), as set out in the Grant 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 Recipient, through DoCC, 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 Grant 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 Recipient, through DoCC, shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Bank.
4. As agreed by the Bank and the Recipient, 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 Recipient, through DoCC, and the Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Recipient, through DoCC Director. The Recipient, through DoCC, shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>	<p>Submit six-monthly reports to the Bank throughout Project implementation, commencing after the Grant Effective Date. Submit each report to the Bank not later than thirty (30) days after the end of each reporting period, including the first report 30 days after the Effective Date.</p>	<p>DoCC Project Implementation (PIU)</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, 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 not later than forty-eight (48) hours after learning of the incident or accident.</p> <p>The incident reports shall be submitted to the Bank no later than 30 (thirty) business days following the incident or accident; said reports shall include root cause analysis, precautions and compensation measures taken.</p>	<p>DoCC PIU</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain a Project Implementation Unit (PIU) under DoCC with qualified staff and resources to support the management of ESHS risks and impacts of the Project by assigning one environmental and one social focal point.</p>	<p>Establish PIU as set out in the Grant Agreement prior to Grant Effective Date, and maintain throughout Project implementation.</p>	<p>DoCC PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including meteorological and oceanographic analysis and measurements; geological, geophysical and geotechnical surveys at specific offshore sites, economic and financial pre-feasibility report, etc.), capacity building, training, and any other technical assistance activities under the Project including, inter alia, Environmental and Social Constraint Analysis, are carried out in accordance with terms of reference (ToRs) acceptable to the Bank, that are consistent with the ESSs and World Bank Group (WBG) Environmental, Health, and Safety Guidelines (EHSGs). Thereafter ensure that the outputs of such activities comply with the ToRs.</p>	Throughout Project implementation	DoCC PIU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>DoCC shall comply with all applicable provisions of Turkish labor law and the Bank's ESS2 in relation to labor and working conditions for workers involved in activities financed under the grant. These workers include:</p> <ol style="list-style-type: none"> Government staff assigned by the DoCC PIU. These staff will remain subject to the terms and conditions of their existing public sector arrangements. Consulting services (firms and individuals) hired under the grant financing arrangements consisting of technical expertise, e.g., for M&E, MIS, institutional development, communications, and environment and social safeguards. <p>Provisions relevant for these workers include;</p> <ul style="list-style-type: none"> Ensure that Project Workers, as defined under ESS2, i.e. directly engaged by the Recipient or through third-parties to work specifically in relation to the project (direct and contracted workers) will be hired, promoted and their employment, where needed, terminated based on principles of non-discrimination and equal opportunity, no-harassment, and freedom of association; Ensure that all Project Workers are provided with information and documentation that is clear and understandable regarding their terms and conditions of employment, their rights under national labor and employment laws (including payment of wages and deductions, periods of rest and leaving; 	Throughout Project implementation	DoCC PIU

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none"> ▪ Ensure the adoption of appropriate occupational health and safety (OHS) measures, in line with ESS2, at the work place (no matter their locations and including without limitation on field assignments), which shall consider inter alia an assessment of the potential OHS risks associated with the tasks to be carried out and include mitigation measures, such as protocols for protection against communicable diseases (i.e. Covid-19, etc.) as issued by the Ministry of Health, WHO, and the World Bank; ▪ Ensure the adoption of a code of conduct that sets out measures against practices related with sexual exploitation and abuse/sexual harassment (SEA/SH) in the workplace, including the dissemination of the referral services available in the country to respond to such behaviors; ▪ Prohibit and ban child labor as well as forced labor, per ESS2 requirements and applicable national laws; and ▪ Report on compliance with these labor management procedures. 		
<p>2.2 GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Maintain and operate the existing Grievance Mechanism available for civil servants who are the direct workers in this project to allow them to quickly inform management of labor issues and raise workplace concerns and labor-related matters without retaliation.</p> <p>Report on the operation of the project workers GM.</p>	<p>Maintain and operate existing grievance mechanism throughout Project implementation.</p> <p>Submit semi-annual reports on the operation of the project workers GM throughout project implementation</p>	DoCC PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT		
<p>3.1 RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Ensure incorporation of the resource efficiency and pollution prevention provisions, as per relevant ESSs and WB ESHSGs, into respective TA TORs.</p> <p>Ensure incorporation and implementation of resource efficiency and pollution prevention and management measures within the scope of the Project activities.</p>	<p>Prior to finalization of TORs</p> <p>Throughout Project implementation</p>	DoCC PIU
ESS 4: COMMUNITY HEALTH AND SAFETY		
This standard is not relevant to the Project.		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
This standard is not relevant to the Project.			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
This standard is not relevant to the Project.			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
This standard is not relevant to the Project.			
ESS 8: CULTURAL HERITAGE			
This standard is not relevant to the Project.			
ESS 9: FINANCIAL INTERMEDIARIES			
This standard is not relevant to the Project.			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Prepare, disclose, consult upon and adopt a Stakeholder Engagement Plan (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.</p>	SEP shall be disclosed, consulted upon and finalized by appraisal and implemented throughout Project implementation.	DoCC PIU
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Maintain and operate the existing grievance mechanism of the MoEUCC, 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.</p>	Maintain and operate the grievance mechanism throughout Project implementation.	DoCC PIU
CAPACITY SUPPORT			
CS1	Provide training to PIU staff, relevant DoCC and/or MoEUCC staff and relevant stakeholders on the subjects listed as below:	Throughout the project implementation	DoCC PIU

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none"> • The Bank's Environmental and Social Framework • National environmental and social legislation • Stakeholder Engagement Plan (SEP) of the Project • Labor and working conditions • Monitoring and reporting of E&S aspects of the Project • National Occupational, Health and Safety legislation • Community health and safety (including SEA/SH and Covid-19 prevention measures) • Codes of conduct • Other relevant topics, as needed. 	<p>Refresher trainings at least once a year or more frequently if needed, during Project implementation.</p>	