

**Republic of Türkiye
General Directorate of State Hydraulic Works**

**Water Circularity and Efficiency Improvement
Project
(P174915)**

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

January 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Türkiye (the Borrower) shall implement the Water Circularity and Efficiency Improvement Project (the Project), Parts [Parts B, C.1, C.2, C.3.2, C.4.1, C.5.3, C.6, and D.2] (Borrower's Respective Parts of the Project), through Devlet Su İşleri (General Directorate of State Hydraulic Works, hereafter known as DSI, acting under the authority and auspices of the Borrower's Ministry of Agriculture and Forestry (MoAF), 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 DSI, 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 DSI, 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 Borrower, 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 DSI, 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 DSI Deputy Director General. The Borrower, through DSI, 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>Include frequency and content of monitoring reports in the Project Operations Manual (POM) and implement accordingly.</p>	<p>Submit quarterly reports to the Bank throughout implementation of the Borrower’s Respective Parts of the Project, commencing from the Effective Date of the Loan Agreement. Submit each report to the Bank not later than thirty (30) days after the end of each reporting period, including the first report within thirty (30) days after the end of the quarter following the Effective Date of the Loan Agreement.</p>	DSI
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, <i>inter alia</i>, 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>Prepare and submit the incident reports to the Bank no later than thirty (30) days following the incident or accident; said reports shall include root cause analysis, precautions and compensation measures taken.</p>	DSI
C	<p>CONTRACTORS’ MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts, and submit such reports to the Bank as a part of the reports under Section A above.</p>	<p>Submit the monthly reports to the Bank as part of the reports under Section A above throughout implementation of the Borrower’s Respective Parts of the Project.</p>	DSI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		Reporting shall start thirty (30) days after the construction contractors begin the respective activities and thereafter monthly throughout contract implementation of the Borrower’s Respective Parts of the Project.	
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain teams with qualified staff and resources at the DSI Project Management Team (PMT) and the regional directorates to support the management of ESHS risks and impacts of the Project. Each of these teams should include the following at minimum personnel, each with qualifications and experience satisfactory to the Bank</p> <ul style="list-style-type: none"> ○ two environmental specialists in DSI PMT and one environmental specialist in each Regional Directorate team to address environmental risks and impacts under the Environmental and Social Impact Assessment (ESIA) reports, Environmental and Social Management Plans (ESMPs) and sub-project management plans. ○ two social experts to address social risks and impacts under the ESIA reports, Environmental and Social Management Plans (ESMPs), land acquisition, labor issues, stakeholder engagement and grievance redress in the DSI PMT’s General Directorate Team; and two (2) land acquisition experts on each Regional Directorate team ○ one occupational health and safety (OHS) staff in DSI Head Quarter to support PMT addressing OHS risks and impacts under ESIA/ESMPs and sub-management plans. DSI will assign an OHS specialist at Regional Directorates who will perform monitoring duties on OHS issues during construction activities and fill out monthly OHS Monitoring and Follow-Up Forms. ○ One Dam Safety specialist in DSI PMT to address dam safety risk management in compliance with the requirement of the Bank ESF/ESS4 on Safety of Dams and coordinate the work of the Independent Dam Safety Expert to be hired. ○ One OHS specialist is to be hired by each construction contractor (contracted by DSI to carry out the respective irrigation scheme subproject(s)) to implement OHS requirements of the ESIA/ESMP and OHS Management Plans. 	<p>DSI shall establish and maintain teams with qualified staff and resources at the DSI PMT, and the regional directorates, as specified herein and detailed in the POM, no later than the Effective Date of the Loan Agreement and shall maintain the specified staffing throughout the implementation of the Borrower’s Respective Parts of the Project.</p> <p>DSI shall require the Contractor to hire an OHS specialist as specified herein before the implementation their respective works and maintain throughout the implementation of the Borrower’s Respective Parts of the Project.</p>	<p>DSI</p> <p>DSI, through the relevant contractor</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>1.2 ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>1. Prepare, disclose, consult upon and adopt the Environmental and Social Management Framework (ESMF) that has been prepared for the Project, consistent with the relevant ESSs.</p> <p>2. Prepare, disclose, consult upon, adopt and thereafter implement the subproject-specific Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP)s, Stakeholder Engagement Plans (SEPs), Labor Management Procedures (LMP), Resettlement Plans (RPs) and other instruments, as necessary, as set out in the ESMF. The proposed subprojects activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</p>	<p>1. Draft ESMF approved by the Bank disclosed prior to appraisal. Submit the final ESMF after public consultations for the Bank’s review and no objection; adopt and disclose the final ESMF no later than thirty days (30) after the Effective Date of the Loan Agreement, and thereafter carry out the ESMF throughout the implementation of the Borrower’s Respective Parts of the Project.</p> <p>2. Prepare, disclose, consult upon and adopt the corresponding ESIA and ESMP prior to tendering of works for each subproject and thereafter carry out the ESIA and ESMP throughout implementation of the Borrower’s Respective Parts of the Project.</p>	<p>DSI</p>
<p>1.3 MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p> <p>Contractors will submit C-ESMPs prior to the start of the construction works for the approval of the PMT, and thereafter implement the C-ESMPs.</p>	<p>As part of the preparation of procurement documents and prior to the signing of respective contracts with the Contractors.</p> <p>Supervise contractors throughout Project implementation of the Borrower’s Respective Parts of the Project.</p> <p>Before the commencement of the related construction activities for each subproject financed under the Borrower’s Respective Parts of the Project, and thereafter carry out throughout the respective sub-project’s implementation, during the implementation of the Borrower’s Respective Parts of the Project.</p>	<p>DSI</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.4	<p>TECHNICAL ASSISTANCE</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.</p>	The technical assistance activities are carried out consistent with the ESSs throughout the implementation of the Borrower’s Respective Parts of the Project.	DSI
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Prepare, disclose, consult upon and adopt and thereafter implement the Labor Management Procedures (LMP) that have been prepared 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, subcontractors, and supervising firms.</p> <p>All contractors shall develop Contractor Labor Management Plan commensurate with the risks and impacts of the sub-project and implement and monitor it.</p>	Adopt the LMP prior to Project appraisal, and thereafter carry out and monitor the LMP throughout the implementation of the Borrower’s Respective Parts of the Project.	DSI
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. DSI shall ensure that Project Workers using this GM shall not be subject to any form of discrimination or repression and that it includes measures to address SEA/SH complaints.</p>	Establish a grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout the implementation of the Borrower’s Respective Parts of the Project.	DSI
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY MEASURES</p> <p>a. Prepare, disclose, consult upon, adopt, and thereafter implement occupational, health and safety (OHS) measures described in the ESMF and LMP and include OHS plan in the site-specific ESAs/ESMPs.</p> <p>b. All contractors shall develop, implement and monitor an OHS Management Plan commensurate with the risks and impacts of the sub-project.</p> <p>c. Monitor and ensure that occupational health and safety standards are met at workplaces in line with national occupational health and safety legislation, ESS2</p>	<p>a. OHS plans shall be included in the ESAs/ESMPs prepared under 1.2 and shall be carried out throughout the implementation of the Borrower’s Respective Parts of the Project.</p>	DSI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	OHS requirements, WB EHS guidelines, WHO and WB guidelines on COVID-19 prevention.	<p>b. OHS Management Plan shall be prepared and adopted prior to the commencement of any construction work, and thereafter carried out for the relevant subproject, during the implementation of the Borrower's Respective Parts of the Project.</p> <p>c. Throughout the implementation of the Borrower's Respective Parts of the Project</p>	
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT Adopt and implement a Waste Management Plan (WMP), prepared as part of the ESIA/ESMPs for each of subprojects to manage hazardous and non-hazardous wastes, consistent with ESS3.</p> <p>Adopt and implement resource efficiency measures as part of the ESIA/ESMPs for each subprojects, consistent with ESS3.</p>	Same timeframe as 1.2 (2) above.	DSI
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Develop and implement measures and actions for resource efficiency and pollution prevention management in all site-specific ESIA/ESMPs, to be prepared under action 1.2 above, as relevant. These shall include measures to manage the use of raw materials, water, energy, air, water, soil pollution, and waste related to works, equipment, and other relevant project activities.</p>	Same timeframe as 1.2 (2) above.	DSI
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY Adopt and implement measures to manage traffic and road safety risks as required in the ESMPs to be developed under action 1.2 above.</p>	Same timeframe as 1.2 (2) above.	DSI
4.2	COMMUNITY HEALTH AND SAFETY	Same timeframe as 1.2 (2) above.	DSI

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>Assess and manage specific risks and impacts to the community arising from Project activities including behavior of Project workers, traffic and road safety risks, community exposure to noise and dust from construction and sexual exploitation and abuse, and sexual harassments risks. Include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.</p>		
<p>4.3 SEA AND SH RISKS</p> <p>Adopt and implement a SEA/SH Action Plan to assess and manage the risks of SEA and SH.</p>	<p>Adopt the SEA/SH Action Plan 60 days after the Project Effective date and thereafter implement the SEA/SH Action Plan throughout the implementation of the Borrower’s Respective Parts of the Project.</p>	<p>DSI</p>
<p>4.4 SAFETY OF DAMS</p> <p>1. DSI shall hire one or more Independent Dam Safety Specialist(s) based on the Terms of References (TOR) approved by the Bank, with expertise in the various technical fields relevant to the safety aspects of the relevant dams to: (a) inspect and evaluate the safety status of the existing dam or dams under construction (DUC), its appurtenances, and its performance history; (b) review and evaluate the owner’s operation and maintenance procedures; and (c) provide written dam safety assessment report of findings and recommendations for any remedial work or safety related measures necessary to upgrade the existing dam or DUC to an acceptable standard of safety. DSI shall ensure the independent dam safety specialist(s) reviews and advises the DSI on matters relating to dam safety and other critical aspects of the dams.</p> <p>2. DSI shall ensure the dam safety assessment report for all the relevant dams is submitted to the World Bank. If applicable, based on the recommendations of the dam safety assessment report, the DSI shall prepare dam safety plans for the dams based on requirement on quality and timing in the ESF including: (i) Operation and Maintenance Plan (O&MP); and (ii) Emergency Preparedness Plan (EPP).</p> <p>3. DSI shall take necessary actions to ensure any relevant upstream existing dams and DUC, if any, are covered by ESF/ESS4 on Safety of Dam, and provide relevant dam safety reports to the World Bank.</p>	<p>1. The dam safety specialist(s) shall be hired not later than sixty (60) days after the Effective Date of the Loan Agreement</p> <p>2. Dam Safety assessment report of each dam shall be submitted to the Bank two (2) months before start of procurement of civil works associated with the relevant dam. If the dam safety assessment report recommends an update or preparation of the O&MP and EPP, DSI shall discuss with the World Bank the timeline for the update or preparation. Unless otherwise agreed to by the Bank, the update or preparation shall be done within one (1) year of submission of the dam safety assessment report and half a year prior to the closing date of the Loan.</p> <p>3. DSI shall conduct a Screening of the relevant upstream dams and DUC throughout the implementation of the</p>	<p>DSI</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>4. DSI shall take any remedial work or safety related measures necessary to update the relevant existing dams or DUC to an acceptable standard of safety .</p> <p>5. DSI shall carry out environmental and social assessments (ESA) and prepare ESMP where relevant should there be a need for a dam rehabilitation.</p>	<p>Borrower’s Respective Parts of the Project. Once relevant dams/DUC are identified, DSI shall submit relevant dam safety reports to the World Bank within two (2) months of said identification.</p> <p>4. (i) If rehabilitation measures are required, detailed dam safety plans should be updated if not in place. The World Bank will discuss with DSI on the scope and depth of such plans commensurate with the works and site condition. (ii) if no rehabilitation measures are required but the dam safety management is not satisfactory to the World Bank, DSI should update or prepare and implement dam safety plans and provide related training to dam operators.</p> <p>5. If dam rehabilitation is required, carry out an environmental and social assessment and prepare, disclose, and consult on the ESIA/ESMP or ESMP prior to the commencement of any rehabilitation works.</p>	
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>LAND ACQUISITION POLICY FRAMEWORK Adopt and implement a Land Acquisition Policy Framework (LAPF) that has been prepared for the Project, consistent with ESS5.</p>	Adopt the LAPF prior to Project Appraisal, and thereafter implement the LAF throughout implementation of the Borrower’s Respective Parts of the Project.	DSI
5.2	<p>LAND ACQUISITION PLANS Adopt and implement land acquisition plans (LAPs) for each subproject as set out in the LAPF, and consistent with ESS5, covering both land acquisition and land consolidation.</p>	Adopt and implement the respective LAPs, including ensuring that before taking possession of the land and related assets, full compensation has been provided.	DSI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS Ensure that the respective measures to manage biodiversity risks are developed and reflected in site-specific ESIA, ESMPs and bidding documents.</p> <p>Prepare, consult, adopt, disclose, and implement a Biodiversity Management Plan (BMP), as required for each of the subproject, in accordance with the guidelines of the ESIA/ESMP prepared for the Project, and consistent with ESS6.</p>	Apply throughout implementation of the Borrower’s Respective Parts of the Project Same timeframe as under 1.2 (2) above.	DSI
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
Not Relevant			
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS Adopt and implement the chance finds procedure described in the ESMF developed for the Project.</p>	Implement the procedures throughout implementation of the Borrower’s Respective Parts of the Project	DSI
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
Not relevant.			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Adopt and implement the Stakeholder Engagement Plan (SEP) developed 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> <p>Adopt and implement the subproject-specific SEPs for the subprojects.</p>	<p>1. Adopt the SEP prior to Project Appraisal, and thereafter implement the SEP throughout implementation of the Borrower’s Respective Parts of the Project.</p> <p>2. Adopt sub-project specific SEPs prior to the commencement of activities under respective subprojects. Once adopted, implement the respective SEP throughout subproject implementation of the Borrower’s Respective Parts of the Project.</p>	DSI
10.2	<p>PROJECT GRIEVANCE MECHANISM</p>		DSI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>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.</p> <p>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.</p>	<p>Establish and operationalize not later than sixty (60) days after the Effective Date of the Loan Agreement. Update as necessary and implement throughout implementation of the Borrower’s Respective Parts of the Project.</p>	
CAPACITY SUPPORT			
CS1	<p>Training shall be required for PMT staff, stakeholders, communities, Project workers on:</p> <ul style="list-style-type: none"> • stakeholder engagement and grievance mechanism, • managing adverse impacts from land acquisition and land consolidation; • project ESMF approach on E&S risk management; identification of E&S risks and implementation of risks management measures; and E&S monitoring and reporting, and • application of LMP, including Code of Conduct, incident reporting and occupational health and safety. 	<p>Initial training shall be provided not later than sixty (60) days after the establishment of the PMT and before start of activities of the Borrower’s Respective Parts of the Project.</p> <p>Refresher trainings at least once a year or more frequently, during the implementation of the Borrower’s Respective Parts of the Project.</p>	DSI
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, Vehicular Safety, safe use of tools, machinery and equipment, working at heights, environmental, OHS 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 SEA/SH.</p>	<p>Prior to the commencement of the civil works for the respective subprojects and throughout the respective subprojects’ implementation, during the implementation of the Borrower’s Respective Parts of the Project.</p>	DSI DSI to ensure and cause the contractors (responsible for training) to carry out