

Republic of Türkiye

**Directorate General
of State Hydraulic Works
and
Directorate General
of Water Management**

**Türkiye Flood and Drought
Management Project
(P179313)**

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

May 27, 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Türkiye (the Borrower) will implement the Türkiye Flood and Drought Management Project – P179313 (the Project), through its Directorate General of State Hydraulic Works (*Devlet Su İşleri Genel Müdürlüğü* (DSI)) for Parts 1.A, 1.B(i), 1.B(iii), 2, 3.A, and 4.A of the Project, and its Directorate General of Water Management (DGWM) Parts 1.B(ii), 1.B(iii), 3.B, and 4.B of the Project, both DSI and DGWM 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 and DGWM, shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) of Environmental and Social Framework (ESF) of the Bank 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 and DGWM, 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 ESSs, 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 DSI and DGWM, this ESCP will be revised from time to time if necessary, during the Project implementation, to reflect adaptive management of the Project changes and unforeseen circumstances or in response to the Project performance. In such circumstances, the Borrower, through DSI and DGWM, 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 General Director and DGWM Deputy Director General. The Borrower, through DSI and DGWM, 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 environmental and social monitoring reports (ESMRs) 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 content of ESMRs in the Project Operations Manual (POM) and implement accordingly.</p>	<p>Submit ESMRs quarterly to the Bank throughout implementation of the Project, commencing three (3) months after the Effective Date of the Loan Agreement.</p> <p>Submit each ESMR separately by responsible PIU to the Bank not later than thirty (30) days after the end of each reporting period.</p>	<p>DSI PIU for the Parts of the Project to be carried out by DSI as indicated in paragraph 1 of this ESCP (hereinafter references to DSI PIU apply to those Parts of the Project).</p> <p>DGWM PIU for the Parts of the Project to be carried out by DGWM as indicated in paragraph 1 of this ESCP (hereinafter references to DGWM PIU apply to those Parts of the Project).</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, <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 (if contracted), as appropriate.</p> <p>Subsequently, at the Bank’s request, prepare and submit a report on the incident or accident. Said reports shall include root cause analysis, precaution measures to address the incident or accident and prevent its recurrence and compensation measures taken.</p>	<p>Notify the Bank no later than 48 hours after learning of the incident or accident.</p> <p>Submit the incident or accident report to the Bank no later than fifteen (15) days following the incident or accident.</p>	<p>DSI PIU DGWM PIU</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>C CONTRACTORS’ MONTHLY REPORTS Require contractors to provide monthly implementation reports on ESHS performance to supervising firms or—if not contracted—to E&S focal points in the regional directorates of DSI corresponding to the project activities.</p> <p>Require supervision firms (if not contracted, E&S focal points in the regional directorates of DSI corresponding to the project activities) to provide quarterly E&S non-compliance reports to DSI-PIU at headquarters. Said reports shall include contractors’ monthly reports as annexes.</p> <p>Submit non-compliance reports to the Bank as annexed to the ESMRs under Section A.</p> <p>Implementation reports and non-compliance reports shall be prepared according to the metrics specified in the POM which subsequently included in the respective bidding documents and contracts for the contractors’ and supervising firms’.</p>	<p>Implementation reporting shall start thirty (30) days after the construction contractors begin the respective activities and thereafter monthly throughout contract implementation.</p> <p>Non-compliance reporting shall start three (3) months after the construction contractors begin the respective activities and thereafter quarterly throughout contract implementation.</p>	<p>DSI PIU</p>
<p>D NOTIFICATIONS RELATING TO DAAB COMPLIANCE REVIEW OF CONTRACTOR COMPLIANCE WITH SEA/SH PREVENTION AND RESPONSE OBLIGATIONS Notify the Bank of any referral submitted to the Dispute Avoidance and Adjudication Board (DAAB) to initiate a process of compliance review in relation to a contractor’s obligations to prevent and respond to sexual exploitation and abuse (SEA), and/or sexual harassment (SH) specified in the respective works contract with such contractor; and, in the event of any such referral, notify the Bank of: (i) the DAAB’s decision on such referral; (ii) the contractor’s Notice of Dissatisfaction, if any, with such DAAB decision; (iii) any notification received on the commencement of an emergency arbitration proceeding or full arbitration proceeding in relation to the DAAB’s decision; and (iv) the resulting emergency arbitration order and/or full arbitration order, if any.</p>	<p>Within 24 hours from receiving information.</p>	<p>DSI PIU; DGWM PIU</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		
<p>1.1 ORGANIZATIONAL STRUCTURE</p> <p>(a) Establish and maintain a Project Implementation Unit under DSI (DSI PIU) with qualified staff and resources at the DSI headquarters to support the management of ESHS risks and impacts of the Project. DSI-PIU at headquarters should include the following at minimum personnel, each with qualifications and experience satisfactory to the Bank.</p> <ul style="list-style-type: none"> ▪ one environmental specialist to address environmental risks and impacts under the Environmental and Social Impact Assessment (ESIA) reports, Environmental and Social Management Plans (ESMPs) and subproject management plans. ▪ one social specialist to address social risks and impacts under the ESIA reports, ESMPs, land acquisition, labor issues, stakeholder engagement and grievance redress. ▪ one occupational health and safety (OHS) specialist to address OHS risks and impacts under the ESIA reports, ESMPs and subproject management plans. ▪ one qualified engineer (dam safety specialist) to supervise the design and construction of new dams and remedial works and the design and implementation of dam safety measures in compliance with the requirement of the Bank ESS4, Annex 1, Safety of Dams, and Good International Industry Practice, and, if required, coordinate the work of the qualified engineers hired to design dam safety measures. <p>(b) Establish and maintain a Project Implementation Unit under DGWM (DGWM PIU) with qualified staff and resources to support the management of ESHS risks and impacts of the Parts of the Project carried out through DGWM.</p> <p>(c) For Part 1,A Flood Control, of the Project, if supervision firms are not contracted, DSI shall appoint staff and resources at the regional directorates of DSI, corresponding to the project activities, to support the management of ESHS risks and impacts of the Project. E&S specialists at regional directorates should consist of the following at minimum personnel, each with qualifications and experience satisfactory to the Bank.</p> <ul style="list-style-type: none"> ▪ one environmental specialist to address environmental risks and impacts under the ESIA reports, ESMPs and Subproject management plans. ▪ one social specialist to address social risks and impacts under the ESIA reports, ESMPs, land acquisition, labor issues, stakeholder engagement and grievance redress. 	<p>(a) DSI shall establish and maintain teams with qualified staff and resources at the DSI PIU, and the regional directorates, as specified herein and detailed in the POM, as a condition for disbursement for eligible expenditures under Parts 1.A, 1.B(i), 2, 3.A, and 4.A of the Project and shall maintain the specified staffing throughout the implementation of the Project.</p> <p>(b) DGWM shall establish and maintain teams with qualified staff and resources at the DGWM PIU, as specified herein and detailed in the POM, no later than 90 days from the Effective Date of the Loan Agreement and shall maintain the specified staffing throughout the implementation of the Project.</p>	<p>(a) DSI</p> <p>(b) DGWM</p> <p>(c) DSI PIU</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none"> ▪ one OHS specialist to address OHS risks and impacts under the ESIA reports, ESMPs and Subproject management plans. <p>(d) For Part 1.A, Flood Control, of the Project, if supervision firms are contracted, DSI shall appoint one E&S focal point in the regional directorates of DSI, corresponding to the project activities, to coordinate the communication between the supervision firms and the DSI PIU at headquarters and for the land acquisition issues the municipality/governorship and the DSI PIU at headquarters. Each supervision firms will hire or assign one environmental specialist, one social specialist and one OHS specialist to supervise the compliance of the contractor with respect to ESIA reports, ESMPs and subproject management plans.</p> <p>(e) Each construction contractor will hire or assign one environmental specialist, one social specialist and one OHS specialist to address environmental, social and OHS risks and impacts under the ESIA reports, ESMPs, subproject management plans and to implement their management strategies and implementation plans.</p> <p>(f) Adopt the POM, in form and substance satisfactory to the Bank, including the qualifications required for the environmental, social and OHS specialists required for the above positions and ensure the maintenance of the positions of the specialists throughout Project implementation.</p>	<p>(d) DSI shall require the supervision firms to hire specialists as specified herein before the implementation of the respective construction works and maintain them throughout the implementation of the Project.</p> <p>(e) DSI shall require the construction contractors hire specialists as specified herein before the implementation of the respective construction works and maintain them throughout the implementation of the Project.</p>	<p>(d) DSI; and DSI PIU shall cause the relevant supervision firm to carry out.</p> <p>(e) DSI PIU shall cause the relevant construction contractor to carry out.</p> <p>(f) DSI PIU</p>
<p>1.2 ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>(a) Disclose, consult upon, and adopt the Environmental and Social Management Framework (ESMF), Labor Management Procedures (LMP), Resettlement Framework (RF) and Stakeholder Engagement Plan (SEP) that has been prepared for the Project, consistent with the relevant ESSs.</p> <p>(b) Prepare, disclose, consult upon, adopt and thereafter implement the subproject specific ESIA reports, ESMPs, Stakeholder Engagement Plans (SEPs), Resettlement Plans (RPs) and other instruments, as necessary, as set out in the ESMF, RF and SEP. 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>(c) Prepare, adopt, and maintain an Environmental and Social Management System (ESMS) under Component 3.</p>	<p>(a) 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>(b) Prepare, disclose, consult upon, and adopt the corresponding ESIA reports and ESMPs prior to tendering of works for each Subproject and thereafter carry out the ESIA reports and ESMPs as required throughout implementation of the Project.</p>	<p>DSI PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, <i>inter alia</i>, 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 PIU, 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 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 Project.</p>	DSI PIU
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>	<p>The technical assistance activities are carried out consistent with the ESSs throughout the implementation of the Project.</p>	DSI PIU; DGWM PIU
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, <i>inter alia</i>, 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>	<p>Adopt the LMP prior to Project appraisal, and thereafter carry out and monitor the LMP throughout the implementation of the Project.</p>	DSI PIU; DGWM PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
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 Project.	DSI PIU; DGWM PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT</p> <p>Adopt and implement a Waste Management Plan (WMP), prepared as part of the ESIAs/ESMPs for each of subprojects to manage hazardous and non-hazardous wastes, consistent with ESS3. .</p>	Same timeframe as 1.2 (b) above.	DSI PIU
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Develop and implement measures and actions for resource efficiency and pollution prevention management in all site-specific ESIAs and 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, soil pollution, and waste related to works, equipment, and other relevant project activities.</p>	Same timeframe as 1.2 (b) above.	DSI PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>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 (b) above.	DSI PIU
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <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, sexual exploitation and abuse, and sexual harassments risks. Include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.</p>	Same timeframe as 1.2 (b) above.	DSI PIU
4.3	<p>SAFETY OF DAMS</p> <p>If flood control structures to be constructed or rehabilitated meet the requirements of Annex 1 of ESS4, and comply with the Exclusion List of the Loan Agreement for treatment as a dam, and provided that the dam is not classified as Large or Risky:</p> <p>(a) DSI shall engage a qualified engineer (dam safety specialist), as specified under ESS1.1, to supervise the design and construction of new dams and of remedial works and the design and implementation of dam safety measures in compliance with the requirements of ESS4, Annex 1, Safety of Dams, and Good International Industry Practice, and, if required, coordinate the work of the of qualified engineers to be hired to design dam safety measures.</p>	(a) The qualified engineer shall be hired as a condition of disbursement for eligible expenditures under Parts 1.A, 1.B(i), 2, 3.A, and 4.A of the Project as specified under ESS1.1.	DSI PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>(b) DSI shall prepare or update dam safety plans (O&MP and EPP) for the dams based on requirement on quality and timing in line with ESS4 Annex 1 and Good International Industry Practice.</p> <p>(c) DSI shall undertake and/or implement works as identified in (a), and (b), or safety related measures necessary to update the relevant existing dams to an acceptable standard of safety.</p>	<p>(b) The design of Dam Safety Measures as identified in (a) and the outline O&MP and EPP shall be submitted to the Bank four months before the start of procurement of civil works associated with the relevant dam, and submit the final O&MP and EPP at the time agreed with the Bank. Unless otherwise agreed to by the Bank, preparation <u>and implementation</u> of O&MP and EPP shall be completed satisfactorily to the Bank before the Loan's closing date.</p> <p>(c) (i) If rehabilitation measures are required, detailed dam safety plans should be updated by no later than 2 months before start of the bidding process 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 Bank, DSI should update or prepare and implement dam safety plans and provide related training to dam operators in parallel with the construction.</p>	
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT FRAMEWORK Adopt and implement a Resettlement Framework (RF) that has been prepared for the Project, consistent with ESS5.</p>	Adopt the RF prior to Project Appraisal, and thereafter implement the RF throughout implementation of the Project.	DSI PIU
5.2	<p>RESETTLEMENT PLANS Adopt and implement land acquisition plans (RPs) for each Subproject if required as set out in the RF, and consistent with ESS5, covering both land acquisition and land consolidation.</p>	Adopt and implement the respective RPs, including ensuring that before taking possession of the land and related assets, full compensation has been provided.	DSI PIU

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</p> <p>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>	<p>Apply throughout implementation of the Project.</p> <p>Same timeframe as under 1.2 (b) above.</p>	DSI PIU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
Not Relevant			
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS</p> <p>Adopt and implement the chance finds procedure described in the ESMF developed for the Project.</p>	Implement the procedures throughout implementation of the Project	DSI to ensure and cause the contractors to carry out.
ESS 9: FINANCIAL INTERMEDIARIES			
Not relevant.			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>(a) Implement the Stakeholder Engagement Plan (SEP) developed for the Project, consistent with ESS10, which includes measures to, <i>inter alia</i>, 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>(b) Adopt and implement the subproject specific SEPs for the subprojects.</p>	<p>(a) implement the SEP throughout implementation of the Project.</p> <p>(b) 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 Project.</p>	DSI PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism (GM), 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 GM 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 Project.</p>	DSI PIU
CAPACITY SUPPORT			
CS1	<p>Training shall be required for PIU 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 PIU and before start of activities of the Project.</p> <p>Refresher trainings at least once a year or more frequently, during the implementation of the Project.</p>	DSI PIU
CS2	<p>Training to be delivered to Project workers on 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, E&S and OHS requirements related to procurement (bidding documents, C-ESMP, etc.), labor requirements for primary suppliers, epidemic/pandemic 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.</p>	<p>DSI PIU</p> <p>DSI to ensure and cause the contractors (responsible for training) to carry out</p>