

Republic of Türkiye

**The General Directorate for Infrastructure
Investments (AYGM) under the Ministry of
Transport and Infrastructure (MoTI)**

**Eastern Türkiye Middle Corridor Railway
Development Project**

P179128

Draft

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

Appraisal

September, 2024

1. The Republic of Türkiye (the Borrower) will implement the Eastern Türkiye Middle Corridor Railway Development Project (P179128) (the Project) with the involvement of the Ministry of Transport and Infrastructure (MoTI) and its General Directorate for Infrastructure Investments (AGYM) as set out in the Loan Agreement (the Agreement). The International Bank for Reconstruction and Development (the Bank) has agreed to provide financing for the Project, as set out in the Agreement.
2. The Borrower, through MoTI, 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 Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower, through MoTI, shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Bank. Said E&S documents may be revised from time to time with prior written agreement by the Bank. As provided for under the referred Agreement, the Borrower shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Bank and the Borrower, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Bank and the Borrower, through MoTI, agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Recipient's Representative specified in the Agreement. MoTI shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain a Project specific sub-unit under the Project Implementation Unit (PIU) of the General Directorate for Infrastructure Investments (DGII, henceforth AGYM) under MoTI. This sub-unit will be staffed by (a) existing MoTI/AYGM personnel, and (b) specialists to be mobilized through a consulting firm contract. The consulting firm will recruit one Environmental, Social, Health and Safety (ESHS) manager, one environmental specialist, one social development specialist, one occupational health and safety (OHS) specialist, two Community Liaison Officers (one male and one female) on a full time basis to support management of ESHS risks and impacts of the Project under the supervision of the PIU sub-unit.</p>	<p>Establish ETMIC sub-unit and hire the specific positions as listed in the previous column prior to the Project Effective Date and thereafter maintain the PIU, the sub-unit and these positions throughout Project implementation.</p>	AYGM/MoTI
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement the following capacity building measures:</p> <ul style="list-style-type: none"> training for PIU staff, Project workers and relevant stakeholders on preparation of site-specific ES Instruments; stakeholder mapping and engagement; emergency preparedness and response; community health and safety; and specific aspects of environmental and social assessment in contracts following “Design and Build” modality. Training of “Design and Build” contractors’ E&S teams on E&S assessment and management under the ESF. 	<p>Training for PIU staff, Project workers and relevant stakeholders to be initiated within one (1) year of the Effective Date.</p> <p>Initiate the training when the contractors are recruited and maintain throughout the project implementation period.</p>	AYGM/MoTI
MONITORING AND REPORTING			
C	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> Status of preparation and implementation of E&S documents required under the ESCP. Status of implementation of the mitigation measures and monitoring actions. Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. 	<p>Submit six-monthly regular monitoring reports to the Bank throughout Project implementation, commencing six (6) months after the Effective Date of the Agreement.</p> <p>Submit each regular monitoring report to the Bank no later than thirty (30) days after the end of each reporting period.</p>	AYGM/MoTI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. E&S performance of contractors and subcontractors as reported through (monthly) contractors' and supervision firms' reports. Number and status of resolution of incidents and accidents reported under action E below. 		
D	<p>CONTRACTORS' AND SUPERVISING FIRMS' MONTHLY E&S MONITORING REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Bank.</p>	Submit the Contractors' and Supervising Firms' Monthly E&S Monitoring Reports to the Bank as annexes to the reports to be submitted under action C above.	AYGM/MoTI
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Bank of any incident or accident relating 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 those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Bank upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>Notify the Bank no later than forty-eight (48) hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Bank no later than ten (10) days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.</p>	AYGM/MoTI
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <p>1. Adopt, disclose and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for the Project, consistent with the relevant ESSs.</p>	1. Adopt and disclose the draft ESIA and ESMP prior to appraisal and thereafter update and implement the ESIA and ESMP throughout Project implementation.	AYGM/MoTI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>2. Update the ESIA and ESMP based on final design of the sub-projects under the “Design and Build” contracting modality and thereafter implement the updated instruments.</p>	<p>2. Update after final design is determined and before the construction works commence, and thereafter implement the updated instruments throughout Project implementation.</p>	
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>1. Incorporate the relevant aspects of the ESCP, including, inter alia, requirement to comply with the Project’s ESIA, RF, LMP, SEP, ESMP and other sub-management plans into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Bank.</p> <p>2. Require the Contractor to prepare and implement the C-ESMP as set out in the updated Project’s ESIA, ESMP and sub-management plans as per the final design, to provide site-specific details for the implementation of mitigation measures and in a manner satisfactory to the Bank.</p>	<p>1.. Relevant E&S provisions are incorporated into the procurement documents and contracts prior to the finalization of procurement packages; supervise contractors throughout Project implementation.</p> <p>2. C-ESMP prepared in a manner satisfactory to the Bank prior to the start of civil works.</p>	AYGM/MoTI
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	<p>Throughout Project implementation.</p>	AYGM/MoTI
ESS 2: LABOR AND WORKING CONDITIONS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>1. Prepare and implement the Labor Management Procedures (LMP) for the Project.</p> <p>2. Require the Contractor to prepare and implement the LMP, as set out in the Project's ESMP. The contractor is required to prepare its own LMP and this document shall include a Code of Conduct (CoC) which has provisions on Sexual Exploitation, Abuse, and Harassment (SEA/SH) incidents.</p> <p>3. To eliminate the risks that may arise from interaction between project workers and local communities, the Contractor shall prepare a Labor Influx Management Plan and a Workers' Camp Management Plan based on the Good International Industry Practice and the Project's ESIA. These plans shall involve sensitization and awareness campaigns among the project workers and the local community, including but not limited to Code of Conduct (CoC) and grievance mechanism.</p>	<p>1. Adopt and disclose the draft LMP prior to appraisal and thereafter update no later than thirty (30) days after the Effective Date and implement throughout Project implementation Prepare LMP, throughout Project implementation.</p> <p>2. Incorporate the LMP as part of the respective bidding documents for the respective Contractor prior to the carrying out of the Project.</p> <p>3. Prior to commencement of works.</p>	AYGM/MoTI
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MANAGEMENT PLAN</p> <p>Require contractors and subcontractors to prepare and implement Site Specific OHS Management Measures or Plan in accordance with the Project's ESIA.</p>	<p>Prepare prior to commencement of civil works and thereafter implement the plan throughout Project implementation.</p>	AYGM/MoTI
2.3	<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.</p>	<p>Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.</p>	AYGM/MoTI
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>RESOURCE EFFICIENCY, AND POLLUTION PREVENTION AND WASTE MANAGEMENT</p> <p>1. Adopt, disclose, update, and implement a stand-alone Pollution Prevention and Waste Management Plan (PPWMP) incorporating:</p> <ul style="list-style-type: none"> - Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared and subsequently updated under action 1.1 above. - management of hazardous and non-hazardous wastes, consistent with ESS3. 	<p>1. Same timeframe as for the preparation, updating and implementation of the ESIA and ESMP under point 1.1.1 and 1.1.3 above,</p>	AYGM/MoTI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	2. PPWMP shall be included into all civil works contracts and contractors shall be obligated to adhere.	2. Same timeframe as for the procurement packages and C-ESMPs under action 1.2 above.	
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>1. Adopt, subsequently update, and implement a stand-alone Traffic Management Plan (TMP) incorporating measures to manage traffic and road safety risks.</p> <p>2. TMP shall be included into all civil works contracts and contractors shall be obligate to adhere.</p>	<p>1. Same timeframe as for the preparation, updating and implementation of the ESIA/ESMP specified in items 1.1.1 and 1.1.3 above,</p> <p>2. Same timeframe as for the procurement packages and C-ESMPs under action 1.2 above.</p>	AYGM/MoTI
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>1. Adopt, disclose, and subsequently update and implement a stand-alone Community Health and Safety Management Plan (CHSMP).</p> <p>2. CHSMP shall be included into all civil works contracts and contractors shall be obligate to adhere.</p>	<p>1. Same timeframe as for the preparation, updating and implementation of the ESIA/ESMP specified in items 1.1.1 and 1.1.3 above,</p> <p>2. Same timeframe as for the procurement packages and C-ESMPs under action 1.2 above.</p>	AYGM/MoTI
4.3	<p>SEA AND SH RISKS</p> <p>Manage SEA/SH risks and impacts through preparation and implementation of an SEA/SH Action Plan and the provisions in the LMP.</p>	Prepare the SEA/SH Action Plan no later than thirty (30) days after the Effective Date, and thereafter implement them throughout Project implementation.	AYGM/MoTI
4.4	<p>EMERGENCY PREPAREDNESS AND RESPONSE PLAN</p> <p>1. Adopt and implement a stand-alone Emergency Preparedness and Response Plan (EPRP) covering the risks on local communities and the cooperation with related authorities.</p>	1. Same timeframe as for the preparation, updating and implementation of the ESIA/ESMP specified in items 1.1.1 and 1.1.3 above,	AYGM/MoTI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	2. EPRP shall be included into all civil works contracts and contractors are obligate to adhere.	2. Same timeframe as for the procurement packages and C-ESMPs under action 1.2 above.	
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT FRAMEWORK Prepare and implement a stand-alone Resettlement Framework (RF) for the Project, consistent with ESS5.	Prepare the draft RF prior to appraisal, update within thirty (30) days of the Effective Date, and thereafter prepare and implement Resettlement Plans following the RF throughout Project implementation.	AYGM/MoTI
5.2	Prepare and implement a Resettlement Action Plan (RP) or a Livelihood Restoration Plan (LRP) for each activity under the Project for which such RP or LRP is required, as set out in the RF and consistent with the RF.	Prepare and implement the respective RP or LRP prior to carrying out the relevant works, ensuring that before taking possession of the land and related assets, full compensation has been provided and as applicable, displaced people have been resettled and moving allowances have been provided.	AYGM/MoTI
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS 1. Adopt, disclose, subsequently update and implement a Biodiversity Management Plan (BMP), in accordance with the guidelines of the ESIA prepared for the Project, and consistent with ESS6. 2. Undertake additional biodiversity studies of fauna species, to identify and demarcate potential critical habitats and include relevant findings and mitigation measures in updated ESIA/ESMP above. 3. Updated BMP shall be included into all civil works contracts and contractors shall be obligate to adhere.	1. Same timeframe as for the preparation and implementation of the ESIA and ESMP specified in items 1.1.1 and 1.1.3 above. 2. Within the timeframe indicated in the ESIA/ESMP for particular species. 3. Same timeframe as for the procurement packages and C-ESMPs under action 1.2 above.	AYGM/MoTI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Currently not relevant to the project		
ESS 8: CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE RISKS AND IMPACTS</p> <p>1. Adopt, disclose, subsequently update and implement a stand-alone Cultural Heritage Management Plan (CHMP) in accordance with the guidelines of the ESIA prepared for the Project, and consistent with ESS8.</p> <p>2. Updated CHMP shall be included into all civil works contracts and contractors shall be obligated to adhere.</p>	<p>1. Same timeframe as for the preparation, updating and implementation of the ESIA/ESMP specified in items 1.1.1 and 1.1.3 above,</p> <p>2. Same timeframe as for the procurement packages and C-ESMPs under action 1.2 above.</p>	AYGM/MoTI
8.3	<p>CHANCE FINDS</p> <p>Describe and implement the Chance Finds Procedure, as part of the CHMP of the Project.</p>	Same timeframe as for the preparation and implementation of the CHMP above.	AYGM/MoTI
8.4	Chance Finds Procedure shall be included into all civil works contracts and contractors shall be obligated to adhere.	Same timeframe as for the procurement packages and C-ESMPs under action 1.2 above.	AYGM/MoTI
ESS 9: FINANCIAL INTERMEDIARIES			
	Currently not relevant to the project		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN</p> <p>Update and implement 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>	Update and disclose the SEP prior to the project appraisal, and thereafter implement the SEP throughout Project implementation.	AYGM/MoTI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <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>	Establish the grievance mechanism prior to the Effective Date, and thereafter maintain and operate the mechanism throughout Project implementation.	AYGM/MoTI
<p>INDICATORS FOR IMPLEMENTATION READINESS</p> <p>The following actions are indicators for implementation readiness:</p> <ol style="list-style-type: none"> 1. Establishment of the ETMIC sub-unit under the Project Implementation Unit (PIU) (A above) 2. Recruitment and training of E&S staff within Project Implementation Entity (A above) 3. ES assessments and plans to be prepared by the Borrower within thirty (30) days of the Effective Date (1.1 above) 			