

**Republic of Turkey
Rail Logistics Improvement Project
P170532**

Final

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

June 4, 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The General Directorate for Infrastructure Investments under the Ministry of Transport and Infrastructure (MoTI) shall implement the Rail Logistics Improvement Project (the **Project**). The International Bank for Reconstruction and Development (hereinafter the Bank) has agreed to provide financing for the Project.
2. The General Directorate for Infrastructure Investments shall 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. The General Directorate for Infrastructure Investments shall also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs), Resettlement Action Plans (RAPs), Labor Management Procedures (LMP), and Stakeholder Engagement Plans (SEPs), and other specific mitigation plans as per the timelines specified in those E&S documents.
4. The General Directorate for Infrastructure Investments is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the by the parties involved in the project.
5. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Bank by the General Directorate for Infrastructure Investments as required by the ESCP and the conditions of the legal agreement, and the Bank shall monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Bank and the General Directorate for Infrastructure Investments, 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, the Government of Turkey shall agree to the changes with the Bank and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Bank and the General Directorate for Infrastructure Investments. The General Directorate for Infrastructure Investments shall disclose the updated ESCP in the shortest possible time.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the General Directorate for Infrastructure Investments shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, land acquisition/resettlement related or labor risks.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	REGULAR REPORTING Prepare and submit regular monitoring reports on 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 documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).	Quarterly throughout Project implementation	DGII/MOTI
B	INCIDENTS AND ACCIDENTS 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 and workers in incidents such as OHS accidents or that result in threatening community health and safety. Provide sufficient detail regarding 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 supervising entity, as appropriate. Subsequently, as per the Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.	Notify the Bank within 48 hours after the occurrence of the incident or accident. A report (an incident report including root cause analysis, precautions and compensation measures taken) would be provided within 30 business days to the Bank, as requested.	DGII/MOTI DGII/MOTI
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE Ensure that a Project Implementation Unit (PIU) is established/staffed with qualified staff to support management of risks including one social and one environment specialist, one OHS specialist and one public relation/stakeholder engagement specialist is responsible for full compliance with the ESF and relevant instruments. Maintain the structure of the complete PIU throughout Project implementation.	Strengthen the capacity of the PIU, by hiring or assigning one environmental specialist, one social specialist, one OHS specialist, and one stakeholder engagement specialist no later than 30 days after the Effective Date of the Project Throughout project implementation	DGII/MOTI DGII/MOTI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.2	MANAGEMENT TOOLS AND INSTRUMENTS FOR COMPONENT 1 Adopt and implement advanced drafts of the ESIA and ESMPs (including all sub-management plans – Annexes to ESMPs) for the Cukurova and Filyos railway subprojects, disclose and consult in form and substance acceptable to the Bank. Undertake required additional environmental and social screening/assessments and studies, as specified under ESSs 3, 6 and 8 below, for the Cukurova and Filyos railway sections; provide update to the ESIA, ESMP and RAP reports and GIS maps in electronic format; incorporate findings into the detailed design. The update of the ESIA and ESMPs will include consideration of E&S risks of associated facilities (substations and electricity transmission lines), approach to alternative analyses, E&S assessment of project facilities (quarry sites etc.) and the ToR for the 3rd party monitoring consultant for the project E&S supervision and reporting, in form and substance acceptable to the Bank. Include provisions for safeguards tasks and instruments in tender documents and contract requirements so that detailed design tasks reflect phasing for activities such as the Environmental and Social Impact Assessment, Environmental and Social Management Plans, and Resettlement Action Plans	Throughout the project implementation 2 months from the date of receipt of the full package of the draft detailed engineering design of the two subproject investments (Cukurova and Filyos) under the project; and prior to the finalization of respective tender documentation Before the finalization of the tender document, the detailed engineering design for the two subproject investments (Cukurova and Filyos) under the project	DGII/MOTI DGII/MOTI DGII/MOTI
1.3	MANAGEMENT TOOLS AND INSTRUMENTS FOR COMPONENT 2 Ensure the due consideration and implementation of the environmental and social aspects within the scope of the Feasibility Study, in accordance with the final Terms of Reference for the Feasibility Studies for 12 Last Mile Connection (LMC) subproject activities Prepare, disclose and consult ESF documents for the associated facilities (sub-stations and electricity transmission lines), as confirmed by the final detailed design Prepare, disclose and consult ESF documents for the project facilities (quarries, access roads, material storage sites, construction camps) as confirmed by the detailed design	During the implementation of the Feasibility Studies After the finalization of the detailed engineering design, and before the start of the construction After the finalization of the detailed engineering design, and before the start of the construction	DGII/MOTI DGII/MOTI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including requirement to comply with ESMPs, RAPs, and LMPs, into the ESHS requirements of the procurement documents to ensure that the requirement to produce Contractor's ESMP (based on ESMPs produced as part of ESIA), RAP, LMP's GRM for Contractor's personnel, and ESHS Code of Conduct are included into bidding documents for civil works contracts. Thereafter, ensure that the contractors comply with the ESHS requirements of their respective contracts.	After finalization of the detailed engineering design for the subprojects/investments and financing, prior to the finalization of the respective tender documentation Supervise contractors throughout the Project implementation.	DGII/MOTI DGII/MOTI
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Implement Labor Management Procedures (LMP), which were prepared and disclosed before Appraisal. Update LMP, as needed. Ensure all Contractors adopt and implement OHS measures as detailed in ESIA/ESMPs	Immediately after Effective Date of the Project and throughout Project implementation. Throughout Project implementation.	DGII/MOTI DGII/MOTI DGII/MOTI
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain, and operate grievance mechanisms for direct workers and obligate contractors to provide GRM for their personnel for civil contracts, including a mechanism to address sexual exploitation and abuse (SEA) and sexual harassment (SH) grievances. Monitor implementation of the GRM and maintain a GRM LOG.	Grievance mechanism established 30 days after Effective date of the Project and maintained throughout Project implementation. Throughout Project implementation.	DGII/MOTI DGII/MOTI
2.3	OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES Where assessed as necessary, implement measures of protection at work and safety for jobs with increased risk of injury and damage to health, as well as organization of training for workers in such jobs. Ensure all Contractors adopt and implement OHS measures as detailed in ESIA/ESMP.	Throughout Project implementation.	DGII/MOTI
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.1	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Include measures to prevent pollution during construction and operation into Contractors' ESMPs (including development of Waste Management Plan) following guiding principles of the ESS 3, ESIA, ESMPs and the WBG EHS Guidelines, and duly applied. Construction Materials Management Plan Obtain permit for the Burnaz Spring Groundwater Protection Area from State Hydraulic Agency (DSI) Update the Filyos and Cukurova ESIA to incorporate the post-mitigation operational phase noise modeling after design of the mitigation measures (barns, noise barriers)	Throughout Project implementation. Before the construction starts Prior to the finalization of the detailed design Prior to the finalization of the detailed design	DGII/MOTI DGII/MOTI DGII/MOTI
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY: Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs (including development and implementation of Traffic Management Plan) Ensure these measures are included into Contractors' ESMPs following guiding principles of the ESF and ESIA and duly applied.	Prior to start of the civil works, and throughout Project implementation	DGII/MOTI
4.2	COMMUNITY HEALTH AND SAFETY: Adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities and ensure these measures are included in Contractor's sub management plans, in line with sub project specific ESMPs and in form and substance acceptable to the Bank. Ensure Community Health and Safety protocols for operational stage of Component 2 are developed, adopted and implemented in compliance with international best practice and WBG EHS Guidelines	Prior to commencement of civil works Before Component 2 commissioning stage	DGII/MOTI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.3	Detailed design and Contractor's ESMPs consider emergencies risks (such as flooding etc.) and envisage mitigation measures to address these risks.	After finalization of technical designs of subprojects/investments and financing, prior to the preparation of procurement documents	DGII/MOTI
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT PLANS: Update and revise sub project specific RPs, disclose, consult with stakeholders, and implement in a manner acceptable to the Bank. Establish, adopt and implement the RP with arrangements, that allows for the compensation of certain entitlements currently not covered through national legislation. Prepare, adopt, implement RPs (if necessary), for selected LMC subprojects in a manner acceptable to the Bank.	After finalization of detailed designs of subprojects/investments, and prior to commencement of civil works. Prior to commencement of any land acquisition activity. Prior to commencement of civil works of LMC sub projects.	DGII/MOTI DGII/MOTI DGII/MOTI
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	Finalize biodiversity data collection by undertaking additional studies and update the ESIA, ESMPs and detailed design accordingly, as specified below Filyos railway section: - Survey on otter population and habitat preference - Migratory birds' seasonal study Cukurova railway section: - Survey to obtain seasonal data to update the critical habitat assessment for migratory birds Detailed Design revised to ensure the avoidance of: (i) Critical habitat area for species identified by ESIA (Sternbergia ulchella) (ii) If additional study confirms so, critical habitat for migratory birds (iii) If no permit from DSI, Burnaz Spring Groundwater Protection Area Update the Filyos and Cukurova ESIA and Biodiversity Management Plans referred to in 1.2 above as sub-management plans annexed to the ESMPs	Before the finalization of the detailed design (to be finalized based on the recommendations of updated Filyos and Cukurova ESIA and ESMPs) Before the finalization of the detailed engineering design During spring and summer season 2020, and prior to finalization of the detailed design First half and 3rd quarter of 2020, and prior to finalization of the detailed design Prior to the finalization of the design Prior to the finalization of the detailed design	DGII/MOTI
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Currently not relevant to the project		
ESS 8: CULTURAL HERITAGE			
8.1	Chance Finds Procedure is included into all civil works contracts and contractors are obligate to adhere.	Throughout Project implementation	DGII/MOTI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
8.2	Revise the detailed design to avoid the impacts and obtain authority permits on the following cultural heritage sites: - Isus Ancient Waterway; - Ancient City of Issos; - Sazkoy site Obtain permits for: - Oteyuz Mahallesi site; - Ancient City of Tios Update respective Cultural Heritage Management Plans (CHMPs) referred to in 1.2. as sub-management plans annexed to the ESMPs At the sites of the major cultural heritage significance, mobilize the cultural heritage/archaeological monitoring expert/s to work with the equipment operators and have authority to stop the works as envisaged by the ESIAs/ESMPs/CHMPs	Prior to the finalization of the detailed design Prior to the finalization of the detailed design Prior to the start of construction Throughout Project implementation	DGII/MOTI DGII/MOTI
ESS 9: FINANCIAL INTERMEDIARIES			
	Not relevant to the project		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE: Disclose, consult with stakeholders, finalize (based on the received feedback) and redisclose SEPs, which were prepared for both subprojects and disclosed before Appraisal. Implement SEPs; report on the implementation of all activities in the SEPs. Prepare, consult, disclose and implement additional SEPs for the selected 2 LMC subprojects.	Initial SEPs were already prepared and disclosed and shall be updated and re-disclosed after finalization of technical designs of subprojects/investments Throughout Project implementation. Not later than 30 days after the Project Effective Date. of the Project and then quarterly (every three months) during implementation of the Project Consult and disclose SEPs after finalization of technical designs of selected 2 LMC subprojects.	DGII/MOTI DGII/MOTI DGII/MOTI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
10.2	Establish and maintain a Project-level GRM.	Grievance mechanism established 30 days after Effective Date of the Project and maintained throughout Project implementation.	DGII/MOTI
CAPACITY SUPPORT (TRAINING)			
CS1	Training will be required for staff and stakeholders on: • Preparation of site-specific ES Instruments • stakeholder mapping and engagement • specific aspects of environmental and social assessment • international requirements for tender procedures	Within the first year of the project implementation, followed by a minimum one annual refresher training	DGII/MOTI/WB