

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

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

**April 9 2020**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The General Directorate for Infrastructure Investments under the Ministry of Transport and Infrastructure (MoTI) will 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 will 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 will 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 will 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 will 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 will agree to the changes with the Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Bank and the General Directorate for Infrastructure Investments. The General Directorate for Infrastructure Investments will 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
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>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&amp;S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	Semi-annually throughout Project implementation. In Coordination with the WB ISR Report.	DGII/MOTI
B	<p><b>INCIDENTS AND ACCIDENTS</b></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 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.</p>	<p>Notify the Bank within 48 hours after learning of the incident or accident.</p> <p>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.</p>	<p>DGII/MOTI</p> <p>DGII/MOTI</p>
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<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Ensure that a Project Implementation Unit (PIU) 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.</p> <p>Maintain the structure throughout Project implementation.</p>	<p>Strengthen the capacity of the PIU including ES staff prior to the project effectiveness</p> <p>Throughout project implementation</p>	<p>DGII/MOTI</p> <p>DGII/MOTI</p>

1.2	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS FOR COMPONENT 1</b></p> <p>Update, an advanced draft of the ESIA and ESMPs for the Cukurova and Filyos railway subprojects, disclose and consult in a manner acceptable to the Bank.</p> <p>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 ESIA, ESMP and RAP reports and GIS maps in electronic format; incorporate findings into the detailed design.</p> <p>Include provisions for safeguards tasks and instruments in tender documents and contract specifications 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</p>	<p>Before the project appraisal</p> <p>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</p> <p>Before the finalization of the tender document, the detailed engineering design for the two subproject investments (Cukurova and Filyos) under the project</p>	<p>DGII/MOTI</p> <p>DGII/MOTI</p> <p>DGII/MOTI</p>
1.3	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS FOR COMPONENT 2</b></p> <p>Develop final Terms of Reference for the Feasibility Studies for 12 Last Mile Connection (LMC) subproject activities.</p> <p>Prepare, disclose and consult ESF documents for the associated facilities (as confirmed by the final detailed design)</p>	<p>1 month from the date of receipt of the technical details and results of the subprojects</p> <p>After the finalization of the detailed engineering design, and before the start of the construction</p>	<p>DGII/MOTI</p> <p>DGII/MOTI</p>
1.4	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including requirement to comply with ESMPs, RAPs, and Labor Management Procedures, into the ESHS specifications of the procurement documents to ensure that the requirement to produce Contractor's ESMP, 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 specifications of their respective contracts.</p>	<p>After finalization of the detailed engineering design for the subprojects/investments and financing, prior to the finalization of the respective tender documentation</p> <p>Supervise contractors throughout the Project implementation.</p>	<p>DGII/MOTI</p> <p>DGII/MOTI</p>

**ESS 2: LABOR AND WORKING CONDITIONS**

2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b> Implement Labor Management Procedures.</p> <p>Establish procedures for screening of GBV risks.</p> <p>Ensure all Contractors adopt and implement OHS measures as detailed in ESIA/ESMPs</p>	<p>Throughout Project implementation.</p> <p>Establishment of procedure for screening of GBV prior to work commencement and apply throughout the project life.</p> <p>Throughout Project implementation.</p>	<p>DGII/MOTI</p> <p>DGII/MOTI</p> <p>DGII/MOTI</p>
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b> Establish, maintain, and operate grievance mechanisms for direct workers and obligate contractors to provide GRM for their personnel for civil contracts.</p> <p>Monitor processing of the received complaints and maintain a GRM LOG.</p>	<p>Grievance mechanism operational prior to engaging project workers (direct and contracted) and maintained throughout Project implementation.</p> <p>Throughout Project implementation.</p>	<p>DGII/MOTI</p> <p>DGII/MOTI</p>
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b> 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.</p>	<p>Throughout Project implementation.</p>	<p>DGII/MOTI</p>

**ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT**

3.1	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b> 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.</p> <p>Construction Materials Management Plan</p> <p>Obtain permit for the Burnaz Spring Groundwater Protection Area from State Hydraulic Agency (DSI)</p>	<p>Throughout Project implementation.</p> <p>Before the construction starts</p> <p>Prior to the finalization of the detailed design</p>	<p>DGII/MOTI</p> <p>DGII/MOTI</p> <p>DGII/MOTI</p>
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**ESS 4: COMMUNITY HEALTH AND SAFETY**

4.1	<p><b>TRAFFIC AND ROAD SAFETY:</b> 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.</p>	Throughout Project implementation	DGII/MOTI
4.2	<p><b>COMMUNITY HEALTH AND SAFETY:</b> 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 a manner acceptable to the Bank.</p> <p>Ensure Community Health and Safety protocols for operational stage of Component 2 are developed and implemented in compliance with international best practice and WBG EHS Guidelines</p>	<p>Prior to commencement of civil works</p> <p>Before Component 2 commissioning stage</p>	DGII/MOTI
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	<p><b>RESETTLEMENT PLANS:</b> Update and revise sub project specific RAPs, disclose, consult with stakeholders, and implement in a manner acceptable to the Bank.</p> <p>Establish, adopt and implement the RAP with arrangements, that allows for the compensation of certain entitlements currently not covered through national legislation.</p> <p>Prepare, adopt, implement RAPs (if necessary), for selected LMC subprojects in a manner acceptable to the Bank.</p>	<p>After finalization of detailed designs of subprojects/investments.</p> <p>Prior to commencement of any land acquisition activity.</p> <p>After selection of LMC sub projects and prior to any civil works.</p>	<p>DGII/MOTI</p> <p>DGII/MOTI</p> <p>DGII/MOTI</p>
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**ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES**

	<p>Undertake additional studies and update the ESIA, ESMPs and detailed design accordingly, as specified below</p> <p>Filyos railway section:</p> <ul style="list-style-type: none"> <li>- Survey on otter population and habitat preference</li> <li>- Migratory birds seasonal study</li> </ul> <p>Cukurova railway section:</p> <ul style="list-style-type: none"> <li>- Survey to obtain seasonal data to update the critical habitat assessment for migratory birds</li> </ul> <p>Detailed Design revised to ensure the avoidance of:</p> <ul style="list-style-type: none"> <li>(i) Critical habitat area for species identified by ESIA (Sternbergia ulchella)</li> <li>(ii) If additional study confirms so, critical habitat for migratory birds</li> <li>(iii) If no permit from DSI, Burnaz Spring Groundwater Protection Area</li> </ul>	<p>Before the finalization of the detailed design</p> <p>Before the finalization of the detailed engineering design During spring and summer season 2020, and prior to finalization of the detailed design</p> <p>Spring and summer seasons 2020, and prior to finalization of the detailed design</p> <p>Prior to the finalization of the design</p>	<p>DGII/MOTI</p>
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<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
	<p>Currently not relevant to the project</p>		

<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<p>Chance Finds Procedure is included into all civil works contracts and contractors are obligate to adhere.</p>	<p>Throughout Project implementation</p>	<p>DGII/MOTI</p>

8.2	Revise the detailed design to avoid the impacts and obtain authority permits on the following cultural heritage sites: <ul style="list-style-type: none"> <li>- Isus Ancient Waterway;</li> <li>- Ancient City of Issos;</li> <li>- Sazkoy site</li> </ul>	Prior to the finalization of the detailed design	DGII/MOTI
	Obtain permits for: <ul style="list-style-type: none"> <li>- Oteyuz Mahallesi site;</li> <li>- Ancient City of Tios</li> </ul>	Prior to the finalization of the detailed design	DGII/MOTI

<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
	Not relevant to the project		

<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE:</b> Disclose, consult with stakeholders, finalize (based on the received feedback) and redisclose SEPs prepared for both subprojects.	After finalization of technical designs of subprojects/investments	DGII/MOTI
	Implement SEPs; report on the implementation of all activities in the SEPs.	Throughout Project implementation. At least every six months during implementation of the Project.	DGII/MOTI
	Prepare, adopt and implement additional SEPs for the selected 2 LMC subprojects.	After selection of LMC subprojects.	DGII/MOTI
10.2	Establish and maintain a Project-level GRM.	Throughout Project implementation.	DGII/MOTI

<b>CAPACITY SUPPORT (TRAINING)</b>			
CS1	Training will be required for staff and stakeholders on: <ul style="list-style-type: none"> <li>• Preparation of site-specific ES Instruments</li> <li>• stakeholder mapping and engagement</li> <li>• specific aspects of environmental and social assessment</li> <li>• international requirements for tender procedures</li> </ul>	Within three months after World Bank Board approval followed by a minimum one annual refresher training	DGII/MOTI/WB