

Republic of Türkiye

Istanbul Governorate

Istanbul Resilience Project

P508170

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

Draft Appraisal Version

10-02-2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Türkiye (the Borrower) will implement the Istanbul Resilience Project (P508170) (the Project), with the involvement of the Istanbul Governorate through its Istanbul Project Coordination Unit (IPCU), 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 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 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 agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Borrower Representative specified in the Agreement or [name position of designated official, e.g., minister, director] of the Project Coordination Unit under the Istanbul Governorate. The Borrower 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>a. Strengthen the capacity of the existing Istanbul Project Coordination Unit (IPCU) under the Istanbul Governorate by providing qualified staff and resources to manage environmental, social, health and safety (ESHS) risks and impacts of the Project. This includes appointing one environmental specialist, one social specialist and one occupational health and safety (OHS) specialist, all with experience and qualifications acceptable to the Bank, to ensure full compliance with the ESSs, ESCP, and relevant instruments.</p> <p>b. Contractors shall appoint or hire one environmental and social specialist, as well as an OHS specialist, as specified in their Terms of Reference (ToR), before commencing any civil works on site.</p>	<p>a. Hire or appoint one full time environmental specialist, one social specialist, and one OHS specialist no later than 30 days after Loan Effective Date. Thereafter, ensure the IPCU and these positions are maintained throughout Project implementation.</p> <p>b. Contractors shall hire or appoint their environmental and social and OHS specialists as required, prior to commencing construction works.</p>	<p>Istanbul Governorate</p> <p>Istanbul Project Coordination Unit (IPCU)</p> <p>Istanbul Governorate IPCU shall be responsible and shall cause the Contractors to comply</p>
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Organize capacity building activities delivered on relevant environmental and social aspects under the Project as required in the Environmental and Social Management Framework (ESMF), Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP) to IPCU staff, consultants, contractors, communities, and Project workers. Thematic training activities can include but are not limited to:</p> <ul style="list-style-type: none"> • World Bank Environmental and Social Framework (ESF) • National environmental and social legislation • Project specific instruments namely, ESMF, LMP, SEP • Specific aspects of environmental and social assessments, and preparation and implementation of project and site-specific E&S instruments • Monitoring and reporting of E&S aspects of the Project • Stakeholder mapping and engagement 	<p>Initial training shall be provided no later than 30 days after appointment of the environmental, social and OHS specialists of the IPCU and before start of Project activities.</p> <p>Refresher trainings shall be provided yearly, or as needed, during Project implementation.</p>	<p>Istanbul Governorate</p> <p>IPCU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> Community health and safety (including SEA/SH, etc.) Emergency preparedness and response Code of conduct 		
MONITORING AND REPORTING			
C	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank regular monitoring reports on the ESHS 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, Summary of stakeholder engagement activities carried out as per the SEP, Functioning of the Grievance Mechanism (GM) (i.e. complaints submitted to the GM, grievance log, and progress made in resolving them, etc.) 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. Updates on the implementation of actions and mission recommendations within agreed timelines as specified in the mission Aide Memoire. 	<p>Submit reports to the Bank on a quarterly basis throughout Project implementation, starting with the first calendar quarter following the Loan Effective Date</p> <p>Submit each report to the Bank no later than 15 days after the end of each reporting period.</p>	<p>Istanbul Governorate</p> <p>IPCU</p>
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on E&S performance to the IPCU in accordance with the metrics specified in the respective bidding documents and contracts.</p> <p>Upon request, submit such monthly reports to the Bank through the IPCU.</p>	<p>First report shall be submitted 30 days after the construction contractors start activities and thereafter monthly throughout contract implementation.</p>	<p>Istanbul Governorate</p> <p>IPCU shall be responsible and shall cause the Contractors to comply</p>
E	<p>INCIDENTS AND ACCIDENTS</p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<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; dam failure; 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 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan (CAP) to the Bank no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.</p>	<p>Istanbul Governorate</p> <p>IPCU</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <p>a. Prepare, disclose, consult upon, finalize, and adopt an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p> <p>b. Customize the project-level Environmental and Social Management Plan (ESMP) outlined in the ESMF, obtain clearance from the Bank for at least five site-specific ESMPs, carry out consultations on these ESMPs, and ensure the finalized, consulted versions are incorporated into the bidding documents. The proposed subproject activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</p> <p>c. Require the Contractors to prepare and implement site-specific Contractor Environmental and Social Management Plans (C-ESMPs), as set out in the ESMF.</p>	<p>a. Prepare, disclose and consult upon the ESMF prior to Appraisal, and thereafter implement the ESMF throughout Project implementation.</p> <p>b. Prepare the site-specific ESMPs prior to initiating any tendering process and incorporate the ESMPs as part of the respective bidding documents for the respective subprojects prior to the carrying out of subprojects that requires the preparation of such ESMP.</p>	<p>Istanbul Governorate</p> <p>IPCU shall be responsible and shall cause the Contractors to comply</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		c. Prepare and finalize C-ESMPs prior to commencement of any Project activities on site. Once finalized, implement the respective C-ESMPs throughout Project implementation.	
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, ESMPs, SEP, Labor Management Procedures, and code of conduct, 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>Obligate contractors and supervision consultants that environmental, social, OHS focal points are assigned for managing E&S risks of subprojects by including this obligation into the bidding documents as needed.</p> <p>Include in the bidding documents (for selecting contractors) appropriate provisions based on OHS risk assessment, including specific indicators and enforcement remedies and require all projects with civil works will require contractor OHS Management Plans, commensurate with the risks and impacts.</p> <p>Upon request provide copies of relevant contracts to the Bank.</p>	<p>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise contractors through supervision consultants throughout Project implementation.</p>	<p>Istanbul Governorate</p> <p>IPCU</p>
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>	Throughout Project implementation.	<p>Istanbul Governorate</p> <p>IPCU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.4	<p>CONTINGENT EMERGENCY RESPONSE COMPONENT (CERC)</p> <p>a. Ensure that the CERC Manual as specified the legal agreement includes a description of the E&S assessment and management arrangement including CERC-ESMF that will be included or referred to in the CERC Manual for the implementation of CERC Part 3, in accordance with the ESSs.</p> <p>b. Implement the E&S provisions of the CERC Manual including the CERC-ESMF, and any assessments and plans required therein.</p>	<p>a. The preparation of the CERC-ESMF in form and substance acceptable to the Bank is a withdrawal condition under Section [XX] of Schedule 2 of the [name of legal agreement].</p> <p>b. In accordance with the timeframes specified in the CERC Manual including, the CERC-ESMF, and any assessments and plans required therein.</p>	<p>Istanbul Governorate</p> <p>IPCU</p>
1.5	<p>ASSOCIATED FACILITIES</p> <p>If the construction of associated facilities, as described in the ESMF, is required for the implementation of subprojects', ensure that all activities related to the construction of associated facilities – such as energy transmission lines, wastewater or water supply networks – are carried out in accordance with the applicable requirements of this ESCP and the ESSs. This includes, inter alia, the ESMF, ESMP, C-ESMP, LMP, SEP, contractor management provisions, and other relevant instruments.</p>	<p>Prepare an ESMP for associated facilities prior to their commencement and ensure its implementation throughout the project implementation.</p>	<p>Istanbul Governorate</p> <p>IPCU</p>
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt and implement the Labor Management Procedures (LMP) in accordance with national legislation and ESS2, ensuring that Project workers are aware of it and have access to it. Refer to the Project LMP in the bidding documents of contractors.</p> <p>Obligate awarded contractors to adopt the Project LMP (including Code of Conduct) and ensure their subcontractors' adherence to it.</p>	<p>Implement and monitor LMP starting on the Loan Effective Date and throughout Project implementation, and report through semi-annual progress reports.</p> <p>Same timeframe as for the preparation and implementation of C-ESMPs under Action 1.1 (c)</p>	<p>Istanbul Governorate</p> <p>IPCU shall be responsible and shall cause the Contractors to comply</p>
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</p> <p>Require contractors to prepare and implement OHS Management Plan as needed in accordance with ESMF and respective site-specific ESMP.</p>	<p>Ensure contractors prepare the OHS Management Plan prior to the commencement of the works and thereafter implement the plan throughout Project implementation.</p>	<p>Istanbul Governorate</p> <p>IPCU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.3	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism (GM) for Project workers, as described in the LMP and consistent with ESS2. The IPCU shall ensure that Project Workers using this GM shall not be subject to any form of discrimination or repression by employers and that it includes measures to deal with SEA/SH complaints.</p>	<p>GM shall be established, and operational no later than 30 days following Loan Effective Date and maintained throughout Project implementation.</p> <p>Report quarterly through Project Progress Reports described in Action C.</p>	<p>Istanbul Governorate</p> <p>IPCU</p> <p>IPCU shall be responsible and shall cause the Contractors to comply</p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Prepare and implement a Waste Management Plan (WMP), as part of site-specific ESMPs developed for the Project above to manage hazardous and non-hazardous wastes, consistent with ESS3. And require contractors and subcontractors to prepare and implement the WMP as part of the C-ESMP.</p>	<p>Same timeframe as for the preparation and implementation of site-specific ESMPs and C-ESMPs under Action 1.1 (b&c, respectively).</p>	<p>Istanbul Governorate</p> <p>IPCU shall be responsible and shall cause the Contractors to comply</p>
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the site-specific ESMPs. And require contractors and subcontractors to prepare and implement the WMP as part of the C-ESMP.</p>	<p>Same timeframe as for the preparation and implementation of site-specific ESMPs and C-ESMPs under Action 1.1 (b&c, respectively).</p>	<p>Istanbul Governorate</p> <p>IPCU shall be responsible and shall cause the Contractors to comply</p>
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>As part of the ESMF, develop and implement a road safety management procedure to address potential hazards on communities resulting from construction activities and operationalization of construction equipment. Include actions under the above procedure in the site-specific ESMPs.</p> <p>As part of the bid, the successful contractors will be required to submit a preliminary Traffic Management Plan (TMP) as part of their C-ESMPs. Before work commencement, the TMP will be updated and implemented subsequently.</p>	<p>Same timeframe as for the preparation and implementation of the ESMF and site-specific ESMPs Action 1.1 (a&b, respectively)</p> <p>Same timeframe as for the preparation and implementation of C-ESMPs under Action 1.1 (c)</p>	<p>Istanbul Governorate</p> <p>IPCU shall be responsible and shall cause the Contractors to comply</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>4.2 COMMUNITY HEALTH AND SAFETY</p> <p>As part of the ESMF, prepare, adopt, and implement measures to assess and manage specific risks and impacts to the community arising from Project activities that may generate from behavior of Project workers; risk of labor influx, Gender Based Violence (GBV)/ Sexual Exploitation and Abuse-Sexual Harassment (SEA-SH) risks, emergency situations, limitations on land, potential for community exposure to communicable diseases, dust and noise; and include these measures in site-specific ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Bank.</p> <p>Include these measures in the ESMPs to be prepared in accordance with the ESMF, in form and substance acceptable to the Bank.</p>	<p>Same timeframe as for the preparation and implementation of the ESMF and site-specific ESMPs under Action 1.1 (a & b, respectively)</p>	<p>Istanbul Governorate</p> <p>IPCU shall be responsible and shall cause the Contractors to comply</p>
<p>4.3 SECURITY MANAGEMENT</p> <p>Implement measures and actions in the site-specific ESMPs to manage any risks related to human security in Project-affected communities and for Project workers that could arise from the use of security personnel. These measures shall be consistent with the requirements of ESS4 and implemented in a manner acceptable to the Bank.</p> <p>The IPCU shall require Contractors, through the C-ESMPs, to: (i) make reasonable inquiries to verify that workers retained to provide security are not implicated in past abuses; (ii) ensure security personnel are adequately trained (or verify that they are properly trained) in the use of force (and, where applicable, firearms) and appropriate conduct toward workers and affected communities; and (iii) require security personnel to act within the applicable law and any requirements set out in the contract.</p> <p>If government security forces are engaged, the Borrower shall prepare subproject-level Security Management Plans consistent with the requirements of ESS4 and acceptable to the Bank.</p>	<p>Same timeframe as for the preparation and implementation of site-specific ESMPs Action 1.1 (b)</p> <p>Same timeframe as for the preparation and implementation of C-ESMPs under Action 1.1 (c)</p> <p>Same timeframe as for the preparation and implementation of C-ESMPs under Action 1.1 (c)</p>	<p>Istanbul Governorate</p> <p>IPCU shall be responsible and shall cause the Contractors to comply</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Ensure that the design of new public access buildings and facilities incorporates life and fire safety requirements as specified in the WBG General EHS Guidelines. Additionally, ensure that the design and construction of investments involving new buildings and facilities adhere to the principles of universal access.	After finalizing the technical designs of investments and financing, prior to the preparation of procurement documents.	
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
Not currently relevant to the Project.			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
Not currently relevant to the Project.			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
This standard is not relevant as there are no Indigenous Peoples who meet the criteria under ESS7 in Türkiye.			
ESS 8: CULTURAL HERITAGE			
8.2	<p>CHANCE FINDS Prepare, adopt, and implement the Chance Finds Procedure described in the site-specific ESMPs developed for the Project under Action 1.1 above.</p> <p>Chance Finds Procedure is included into all civil works contracts and contractors are obligated to adhere.</p>	Same timeframe as for the preparation and implementation of site-specific ESMPs Action 1.1 (b)	Istanbul Governorate IPCU
ESS 9: FINANCIAL INTERMEDIARIES			
Not currently relevant to the Project.			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN</p> <p>a. Prepare, disclose, consult 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>b. Implement the Project SEP for each subproject throughout the life of the Project.</p>	<p>a. Prepare, disclose and consult upon the SEP prior to Appraisal, and thereafter implement the SEP throughout the implementation of the Project.</p> <p>b. Ensure that consultations and all relevant stakeholder engagement activities are conducted for each sub-project before the commencement of the bidding process.</p>	Istanbul Governorate IPCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, operate, and report on 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 thirty (30) days after the Loan Effective Date. Update as necessary and implement throughout the implementation of the Project.</p> <p>Report quarterly through Project Progress Reports described in Action C.</p>	<p>Istanbul Governorate</p> <p>IPCU</p>
INDICATORS FOR IMPLEMENTATION READINESS			
<p>The following actions are indicators for implementation readiness:</p> <ul style="list-style-type: none"> i. Recruitment/assignment and training of E&S&OHS specialists within IPCU as described in Action A. ii. Delivery of the trainings specified in Action B. iii. E&S assessments and plans to be prepared by the Borrower at the onset of Implementation as specified in Action 1.1. iv. Establishment and operationalization of the project and workers' GM as specified Action 2.3 and Action 10.2. 			