

**SUPPORT FOR TRANSITION TO LABOR
MARKET PROJECT (P171471)**

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

FINAL
February 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Ministry of Family, Labour and Social Services (MoFLSS) of the Republic of Turkey (the **Grant Recipient** represented by **Directorate General of International Labour Force**) will implement the proposed Support for Transition to Labor Market Project (P171471) (the **Project**), with the involvement of the following agencies/units/parties: Turkish Employment Agency (**İŞKUR**) (in selected project provinces) and Kızılay (**Turkish Red Crescent-TRC**) (in selected project provinces). The International Bank for Reconstruction and Development (the **Bank**) has agreed to provide financing for the Project as the administrator of funds under the European Commission Development Fund.
2. MoFLSS 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, specific documents or plans, as well as the timing for each of these.
3. MoFLSS will also comply with the provisions of environmental and social (E&S) documents required under the Environmental and Social Framework (ESF) and referred to in this ESCP, (i.e. Labor Management Procedures and Stakeholder Engagement Plans), and the timelines specified in those E&S documents.
4. Ministry as the Grant Recipient is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in Paragraph 1 above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by the MoFLSS 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 MoFLSS, 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, MoFLSS 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 MoFLSS. MoFLSS will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Grant Recipient shall reallocate project budget, if needed, to implement actions and measures to address such risks and impacts.

MONITORING AND REPORTING			
A	<p>REGULAR REPORTING: Prepare and submit to the Bank monitoring reports on the environmental, social, occupational health and safety performance of the Project, 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 Project grievance mechanisms (including any grievances filed in relation to the Project).</p>	<p>Semi-annually, as part of the Project Progress Reports, from Effectiveness and throughout Project implementation</p>	<p>MoFLSS, İŞKUR and TRC PIUs. Data will be collected from İŞKUR and TRC provincial directorates/Community and Services Centers</p>
B	<p>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 people, the public or workers. 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.</p>	<p><i>Notify the Bank within 3 business days after learning of the incident or accident.</i></p>	<p>MoFLSS, İŞKUR and TRC PIUs</p>

ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Ensure that each PIU is established with adequate resources and staffing, and, thereafter, maintained, throughout Project implementation, to carry out their respective Project activities, including without limitation to ensure adequate management and implementation of the SEP, LMP and monitoring of social risks.</p> <p>Appointment of:</p> <ul style="list-style-type: none"> • 1 project focal point for GRM and 1 technical expert/project specialist dealing with labor (occupational health and safety) issues in MoFLSS, • 1 designated Social/Communication Specialist and 1 technical expert /project specialist dealing with labor (occupational health and safety) issues in İŞKUR • 1 designated Social/Communication Specialist for communication, management of grievance redress mechanisms and stakeholder engagement management and monitoring and 1 technical expert /project specialist dealing with labor (occupational health and safety) issues in TRC. <p>Share the Terms of Reference for the Social Specialist with the Bank.</p> <p>Hire additional Social Specialists as needed to ensure compliance with the SEP and LMP.</p>	<p>Establishment of PIUs within MoFLSS, İŞKUR and TRC: Before Project Effectiveness.</p> <p>Maintain throughout Project implementation</p>	MoFLSS, İŞKUR and TRC PIUs
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES:</p> <p>Prepare, finalize, adopt and implement the Labor Management Procedures (LMP)</p>	<p>Finalization and adoption of LMP by MoFLSS, İŞKUR and TRC: Before Project negotiations.</p> <p>Implementation of LMP by MoFLSS, İŞKUR and TRC: throughout the Project implementation.</p>	MoFLSS, İŞKUR and TRC PIUs

<p>2.2</p>	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS AND PROJECT BENEFICIARIES:</p> <p>Maintain and operate existing MoFLSS, İŞKUR and TRC GRM for project workers, including community workers or “project beneficiaries” as described in the LMP.</p> <p>Maintain and operate a GRM available for consultants (direct workers), contracted workers and project beneficiaries, who cannot use the grievance mechanism available to civil servants under the Turkish Civil Servant Code but can use the existing GRMs defined in LMP (i.e. Alo 170). In line with the LMP, the three PIUs (MoFLSS, İŞKUR and TRC) shall provide information to the consultants and contracted workers the manner in which they can raise grievances and complaints in the course of their engagement. Such provisions shall define: the deadline in which a complaint can be lodged, to whom it is to be lodged, and in which timeframe it would be resolved.</p> <p>MoFLSS PIU will maintain a central GRM log, where project beneficiaries’ grievances and their resolution will be recorded and classified for monitoring purposes, ensuring that each grievance has an individual reference number and is appropriately tracked and recorded actions completed</p> <p>Ensure that the different categories of Project Workers, including project beneficiaries, have access to the GRM of İŞKUR and TRC, in line with ESS2 and the LMP.</p>	<p>Throughout Project implementation</p>	<p>MoFLSS, İŞKUR and TRC PIUs</p>
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2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES Implement occupational health and safety (OHS) measures specified in the LMP.</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 people, the public or workers (including project beneficiaries) as specified in Part B above.</p>	Throughout Project Implementation.	MoFLSS, İŞKUR and TRC PIUs
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	Not Relevant to the Project		
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>COMMUNITY HEALTH AND SAFETY: Assess, develop and implement measures to manage and respond to any grievances related to GBV and SEA through the Project's GRM, in line with the ESSs, and the LMP.</p>	Throughout Project implementation	MoFLSS, İŞKUR and TRC PIUs
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	Not Relevant to the Project		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	Not Relevant to the Project		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	Not Relevant to the Project		
ESS 8: CULTURAL HERITAGE			
8.1	Not Relevant to the Project		
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	Not Relevant to the Project		

ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>SEP PREPARATION: Prepare, consult upon with stakeholders, finalize, adopt, publicly disclose and, thereafter, implement the Stakeholder Engagement Plan (SEP).</p> <p>Update, adopt, re-disclose, as needed, SEP</p>	<p>Finalization, adoption and disclosure in country of the final SEP: Before Project negotiations</p> <p>Implementation of SEP (including revisions and redisclosure): throughout the Project</p>	MoFLSS, İŞKUR and TRC PIUs
10.2	<p>SEP IMPLEMENTATION Assign a social/communication specialist to the TRC PIU and İŞKUR PIU to oversee the stakeholder engagement activities of each of these PIUs, as defined in SEP, and to report progress on SEP and GRM.</p>	Before Project effectiveness	MoFLSS, İŞKUR and TRC PIUs
10.3	<p>PROJECT GRIEVANCE MECHANISM: Maintain and operate the grievance mechanism mentioned as item 2.2. above, as described in the SEP.</p> <p>Ensure GRM database that compiles and reports all project related grievances is established at MoFLSS under the coordination of a focal point.</p>	Maintain project GRM: Throughout Project implementation	MoFLSS, İŞKUR and TRC PIUs
10.4	<p>INFORMATION DISCLOSURE Ensure timely, and accessible Project information disclosure to all stakeholders, including Project Workers and project beneficiaries, in Turkish and Arabic and in a format and manner that is accessible and culturally appropriate.</p>	Throughout Project implementation	MoFLSS, İŞKUR and TRC PIUs