

**Republic of Türkiye  
Ministry of Energy and Natural Resources**

**EU Instrument for Pre-Accession (IPA)  
Energy Sector Program Phase IV – Offshore  
Wind Support Project  
P179235**

**Negotiated**

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

**May 2, 2023**

## **ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. The Republic of Türkiye (the Recipient) will implement the EU Instrument for Pre-Accession (IPA) Energy Sector Program Phase IV– Offshore Wind Support Project (the Project), through the Ministry of Energy and Natural Resources (MENR) as set out in the Grant Agreement. The International Bank for Reconstruction and Development (the Bank), acting as administrator of the European Union Instrument for Pre-Accession Trust Fund, has agreed to provide financing for the Project, as set out in the referred agreement.
2. The Recipient through MENR 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 Grant Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESSs, and in form and substance, and in a manner acceptable to the Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Bank.
4. As agreed by the Bank and the Recipient, through MENR, this ESCP shall be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient, through the MENR, and the Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Recipient, through MENR. The Recipient, through MENR shall promptly disclose the updated ESCP.

| MATERIAL MEASURES AND ACTIONS   |   | TIMEFRAME  | RESPONSIBLE ENTITY                       |
|---------------------------------|---|--|--|
| <b>MONITORING AND REPORTING</b> |   |  |  |
| A                               | <p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Bank regular monitoring reports on the 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 instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>   | <p>Submit six-monthly reports to the Bank throughout Project implementation, commencing after the Effective Date. Each report shall be submitted to the Bank not later than thirty (30) days after the end of each reporting period, including the first report 30 days after the Effective Date.</p>  | <p>MENR Project Implementation (PIU)</p> |
| 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 or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by MENR, any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the Bank’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p> | <p>Notify the Bank not later than forty-eight (48) hours after learning of the incident or accident.</p> <p>The incident reports shall be submitted to the Bank no later than 30 (thirty) business days following the incident or accident; said reports shall include root cause analysis, precautions and compensation measures taken.</p> | <p>MENR PIU</p>                          |

| MATERIAL MEASURES AND ACTIONS   |   | TIMEFRAME  | RESPONSIBLE ENTITY  |
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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>Maintain the Project Implementation Unit (PIU) under the Directorate General of Foreign Relations and assign to or hire a qualified environmental and social focal point and resources to support the management of ESHS risks and impacts of the Project.</p> <p>Ensure that the consultant firm, responsible for the Environmental and Social Constraint Analysis studies, employ one environmental specialist (full time), one marine biodiversity specialist (part/full time), one Occupational Health and Safety (OHS) specialist (full time) and one social specialist (full time) as one of their key experts.</p> | <p>Prior to the Project Effective Date, and to be maintained throughout Project implementation.</p> <p>Prior to the start of any Environmental and Social Constraint Analysis studies</p>    | <p>MENR PIU</p> <p>MENR PIU<br/>Consultant firm, responsible for the Environmental and Social Constraint Analysis studies</p> |
| 1.2   | <p><b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <p>Prepare and adopt a draft Terms of Reference (ToR) for the Environmental and Social Constraint Analysis.</p> <p>Prepare, disclose and finalize the Environmental and Social Constraint Analysis</p>   | <p>Prepare the ToR prior to Appraisal and thereafter adopt and implement the ToR requirements throughout Project implementation</p> <p>Not later than 18 month after the Effective Date.</p> | <p>MENR PIU<br/>Consultant firm, responsible for the Environmental and Social Constraint Analysis studies</p>                 |
| 1.3   | <p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&amp;S instruments, and code of conduct into the ESHS specifications of the procurement documents and contracts with contracted firms. Thereafter ensure that the contracted firms comply and cause subcontractors (if any) to comply with the ESHS specifications of their respective contracts.</p>  | <p>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise consultant firms throughout Project implementation</p>                                     | <p>MENR PIU</p>   |

| MATERIAL MEASURES AND ACTIONS              |  | TIMEFRAME   | RESPONSIBLE ENTITY              |
|--|--|---|---------------------------------|
| 1.4  | <p><b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the consultancies, Pre-feasibility Studies (including meteorological and oceanographic analysis and measurements; geological, geophysical and geotechnical surveys at specific offshore sites, economic and financial pre-feasibility report, etc.), capacity building, training, and any other technical assistance activities under the Project including, inter alia, Environmental and Social Constraint Analysis, are carried out in accordance with terms of reference (ToRs) acceptable to the Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the ToRs.</p> <p><b>STUDY TERMS OF REFERENCES:</b> Final Terms of References (ToRs) for all respective Pre-feasibility Studies will be reviewed by the Bank’s E&amp;S Specialists and all comments will be addressed during finalization.</p>   | <p>Throughout Project implementation</p> <p>Prior to initiation of the bidding process</p>  | <p>MENR PIU</p> <p>MENR PIU</p> |
| <b>ESS 2: LABOR AND WORKING CONDITIONS</b> |  |   |                                 |
| 2.1  | <p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Adopt and implement in the project workers procedures that consist of the following requirements:</p> <ul style="list-style-type: none"> <li>▪ Ensure that Project Workers, as defined under ESS2, i.e. directly engaged by the Recipient or through third-parties to work specifically in relation to the Project (direct and contracted workers) will be hired, promoted and their employment, where needed, terminated based on principles of non-discrimination and equal opportunity, no-harassment, and freedom of association;</li> <li>▪ Ensure that all Project Workers are provided with clear and understandable information and documentation regarding their terms and conditions of employment, their rights under national labor and employment laws (including payment of wages and deductions, periods of rest and leave;</li> <li>▪ Ensure the adoption of appropriate occupational health and safety (OHS) measures, in line with ESS2, at the work place (no matter their locations and including without limitation on field assignments), which shall consider inter alia an assessment of the potential OHS risks associated with the tasks to be carried out and include mitigation measures, such as protocols for protection against communicable diseases (i.e. Covid-19, etc.) as issued by the Ministry of Health, WHO, and the Bank;</li> </ul> | <p>Adopt these procedures no later than 30 days after the Effective Date, and thereafter implement throughout Project implementation, and monitor and report its implementation status through progress reports semi-annually (every 6 months).</p> <p>Submit semi-annual reports of compliance with these labor management procedures throughout Project implementation.</p> | <p>MENR PIU</p>                 |

| MATERIAL MEASURES AND ACTIONS   |  | TIMEFRAME  | RESPONSIBLE ENTITY |
|---|--|--|--------------------|
|   | <ul style="list-style-type: none"> <li>▪ Ensure the adoption of a code of conduct that sets out measures against practices related with sexual exploitation and abuse/sexual harassment (SEA/SH) in the workplace, including the dissemination of the referral services available in the country to respond to such behaviors;</li> <li>▪ Prohibit and ban child labor as well as forced labor, per ESS2 requirements and applicable national laws; and</li> <li>▪ Report on compliance with these labor management procedures.</li> </ul>   |  |                    |
| 2.2   | <p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish and operate a responsive Grievance Mechanism (GM) to allow Project workers under ESS2 to quickly inform management of labor issues and raise workplace concerns and labor-related matters without retaliation.</p> <p>Establish and operate a GM for Project workers, in line with national laws and consistent with ESS2. The GM shall be adapted to receive and respond to SEA/SH complaints. The GM shall be easily accessible and promptly disclosed to Project workers, in line with ESS2 and national laws.</p> <p>Report on the operation of the project workers GM.</p> | <p>Establish the grievance mechanism no later than the Effective Date of the Grant Agreement and thereafter maintain and operate the mechanism throughout Project implementation.</p> <p>Submit semi-annual reports on the operation of the project workers GM throughout Project implementation</p> | MENR PIU           |
| <b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> |  |  |                    |
| 3.1   | <p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Ensure incorporation of the resource efficiency and pollution prevention provisions into respective TA TORs.</p> <p>Ensure incorporation and implementation of resource efficiency and pollution prevention and management measures within the scope of the Project activities.</p>   | <p>Prior to finalization of TORs</p> <p>Throughout Project implementation</p>  | MENR PIU           |

| MATERIAL MEASURES AND ACTIONS   |   | TIMEFRAME                         | RESPONSIBLE ENTITY  |
|---|---|-----------------------------------|---|
| <b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>   |   |                                   |   |
| 4.1   | <p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>Ensure the incorporation and implementation of the measures to manage traffic (including maritime traffic) and road safety risks as required within the scope of the Project.</p>  | Throughout Project implementation | MENR PIU<br>Consultant Firms engaged in Project relevant activities |
| 4.2   | <p><b>COMMUNITY HEALTH AND SAFETY</b></p> <p>Ensure the assessment and management of specific risks and impacts to the community arising from Project activities, including, inter alia, e.g., response to emergency situations, , limitations on land and marine areas, dust and noise and include mitigation measures into Project relevant activities.</p>   | Throughout Project implementation | MENR PIU<br>Consultant Firms engaged in Project relevant activities |
| <b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>                       |   |                                   |   |
| This standard is not relevant to the Project.   |   |                                   |   |
| <b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>              |   |                                   |   |
| 6.1   | <p><b>BIODIVERSITY RISKS AND IMPACTS</b></p> <p>Ensure the Marine Biodiversity Survey and Critical Habitat Assessment (including bird migration paths) are taken into account in the Terms of Reference (ToR) for the Environmental and Social Constraint Analysis and the study itself.</p> <p>Ensure the survey results and measures are implemented with consideration of findings of Marine Biodiversity Survey and Critical Habitat Assessment</p> | Throughout Project implementation | MENR PIU<br>Consultant Firms engaged in Project relevant activities |
| <b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b> |   |                                   |   |
| This standard is not relevant to the Project.   |   |                                   |   |

| MATERIAL MEASURES AND ACTIONS                                    |   | TIMEFRAME  | RESPONSIBLE ENTITY   |
|--|---|--|--|
| <b>ESS 8: CULTURAL HERITAGE</b>                                  |   |  |  |
| 8.1  | <p><b>CULTURAL HERITAGE RISKS AND IMPACTS</b></p> <p>Ensure the incorporation and implementation of measures, consistent with ESS8, to manage risks and impacts related to cultural heritage within the scope of the Project activities.</p>  | Throughout Project implementation  | <p>MENR PIU</p> <p>Consultant Firms engaged in Project relevant activities</p> |
| 8.2  | <p><b>CHANCE FINDS</b></p> <p>Describe and ensure the implementation of the chance finds procedures, as part of the Project relevant activities and its integration into all relevant contracts.</p>  | Throughout Project implementation  | <p>MENR PIU</p> <p>Consultant Firms engaged in Project relevant activities</p> |
| <b>ESS 9: FINANCIAL INTERMEDIARIES</b>                           |   |  |  |
| This standard is not relevant to the Project.                    |   |  |  |
| <b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b> |   |  |  |
| 10.1   | <p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b></p> <p>Prepare, disclose, consult upon and adopt 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>   | SEP shall be disclosed, consulted upon and finalized by appraisal and implemented throughout Project implementation.   | MENR PIU   |
| 10.2   | <p><b>PROJECT GRIEVANCE MECHANISM</b></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 no later than the Effective Date of the Grant Agreement and thereafter maintain and operate the mechanism throughout Project implementation. | MENR PIU   |

| MATERIAL MEASURES AND ACTIONS   | TIMEFRAME   | RESPONSIBLE ENTITY |
|---|---|--------------------|
| <b>CAPACITY SUPPORT</b>   |   |                    |
| <p>Provide training to PIU staff, relevant MENR staff and relevant stakeholders on the subjects listed as below:</p> <ul style="list-style-type: none"> <li>• The Bank’s Environmental and Social Framework</li> <li>• National environmental and social legislation</li> <li>• Stakeholder Engagement Plan (SEP) of the Project</li> <li>• Labor and working conditions</li> <li>• Environmental and Social aspects of the offshore wind generation</li> <li>• Monitoring and reporting of E&amp;S aspects of the Project</li> <li>• National Occupational, Health and Safety legislation</li> <li>• Community health and safety (including SEA/SH and Covid-19 prevention measures)</li> <li>• Codes of conduct</li> <li>• Other relevant topics, as needed.</li> </ul> | <p>Throughout the Project implementation</p> <p>Refresher trainings at least once a year or more frequently if needed, during Project implementation.</p> | <p>MENR PIU</p>    |