

REPUBLIC OF TURKEY

MINISTRY OF HEALTH

**Turkey Emergency COVID-19 Health Project
Additional Financing (P178462)**

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

27 APRIL 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Turkey (hereinafter the Borrower) shall implement the Turkey Emergency COVID-19 Health Project Additional Financing (the AF Project), with the involvement of the Ministry of Health, as set out in the Loan Agreement. The International Bank for Reconstruction and Development the Bank has agreed to provide financing for the Project, as set out in the referred agreement(s).
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 Loan Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
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, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, grievance management, and the environmental and social (E&S) instruments to be prepared or updated, consulted, adopted, disclosed, and implemented in accordance with the ESSs. 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 Borrower, this ESCP will 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 Borrower, through the Ministry of Health, and the Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Borrower, through Ministry of Health. The Borrower, through the Ministry of Health, shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</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&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>	<p>Submit quarterly reports to the World Bank throughout Project implementation commencing on the Effective Date of the Loan. Submit each report to the World Bank no later than 15 days after the end of each reporting period.</p>	<p><i>Ministry of Health through its Project Management Support Unit (PMSU)</i></p>
B	<p>INCIDENTS AND ACCIDENTS</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, <i>inter alia</i>, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury, any COVID-19 outbreak in the Project. 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 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 no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the Bank within a timeframe acceptable to the Bank.</p> <p>Keep incident/accident notification/reporting system in place throughout the Project implementation.</p>	<p><i>Ministry of Health through its PMSU</i></p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p>	<p>Retain organization structure, including positions of one (1) environmental and one (1) social specialist throughout the Project implementation.</p> <p>Waste management specialist from MOH is assigned within one (1) month after the Effective Date of the Loan Agreement, and retained throughout the Project implementation.</p>	<p><i>Ministry of Health through its PMSU</i></p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>The Project shall be carried out by the MoH through the PMSU already established for the purposes of the original Turkey Emergency COVID-19 Health Project under the Loan Agreement between the Borrower and the Bank, dated May 4, 2020 (Loan No. 9103-TR) (Original Project). The MoH shall retain qualified staff in the PMSU in numbers and with qualifications acceptable to the Bank and shall ensure that the PMSU has sufficient resources to support management of Environmental, Social, Health and Safety (ESHS) risks and impacts of the Project. PMSU staff includes already hired one environmental and one social specialist, who are also responsible for supervising occupational health and safety (OHS) and waste management risks and impacts. Waste management specialist from the respective unit of MOH shall be assigned to support PMSU on provision of up-to-date information on the status of implementation of site-specific WMPHs.</p>		
<p>ENVIRONMENTAL AND SOCIAL AND INSTRUMENTS/ CONTRACTORS</p> <p>1.2 a. Finalize and re-disclose and adopt an updated Environmental and Social Management Framework (ESMF) that was initially prepared for the Original Project and updated for the AF Project, and comply with it throughout the Project implementation. Assess the environmental and social risks and impacts of proposed AF Project activities in accordance with ESSs and the ESMF, the Environmental, Health and Safety Guidelines (EHSs), and other relevant Good International Industry Practice (GIIP), including relevant WHO guidelines including to ensure that individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, have access to the development benefits resulting from the Original Project and AF Project. The ESMF updated for the purposes of AF Project, addresses occupational and community safety risks, and as such includes guidelines on the safe transportation and storage of vaccines, vaccine delivery and medical waste management, fair allocation of COVID-19 vaccines and prioritization of population groups.</p>	<p>a. Finalize, re-disclose and adopt the updated ESMF no later than 30 days after the Effective Date of the Loan Agreement and thereafter implement the ESMF throughout Project implementation.</p> <p>b. Before the carrying out of the relevant Project activities and thereafter implement them throughout the carrying out of such activities.</p> <p>c. The relevant ESHS measures shall be incorporated into the procurement documents before launching the procurement process for the relevant Project activities and subsequent contracts, and thereafter complied with throughout the carrying out of such activities.</p>	<p><i>Ministry of Health through its PMSU</i></p> <p><i>Ministry of Health through its PMSU and shall cause beneficiary healthcare facilities to carry out accordingly</i></p> <p><i>Ministry of Health through its PMSU</i></p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>b. Prepare, consult, adopt, disclose, and implement any site-specific Environmental and Social Management Plans (e.g., Waste Management Plans for Hospitals (WMPHs), Infection Control Protocols (ICPs), in accordance with the ESMF, the ESSs, the EHSs, and other relevant Good International Industry Practice (GIIP), including relevant WHO guidelines to, <i>inter alia</i>, ensure access to and allocation of Project benefits in a fair, equitable and inclusive manner, taking into account the needs of individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable including, as relevant, with regards to vaccines.</p> <p>c. Incorporate the relevant aspects of this ESCP, including, <i>inter alia</i>, the ESMF, any environmental and social management plans (i.e., WMPH, ICP) or other instruments, ESS2 requirements, and any other required ESHS measures (including relevant life and fire safety measures), into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply with the ESHS specifications of their respective contracts.</p> <p>d. Adopt procedures, protocols and/or other measures to ensure voluntary consent of Project beneficiaries receiving vaccines under the Project and ensure that Project beneficiaries who receive vaccines under the Project do so under a program that does not include forced vaccination and is acceptable to the Bank, as set out in the ESMF.</p> <p>e. Prepare Terms of References (TORs) for an environmental and social audit of the acquisition and deployment of the vaccines to be retroactively financed, and obtain Bank’s approval of the TORs.</p>	<p>d. Before the carrying out of the relevant Project activities, and thereafter implemented throughout the carrying out of such activities.</p> <p>e. TORs for the environmental and social audit shall be approved by the Bank before launching the selection of consultants</p> <p>f. The environmental and social audit shall be completed and approved by the World Bank, prior to any disbursements of the Loan proceeds for retroactive financing.</p>	<p><i>Ministry of Health through its PMSU</i></p> <p><i>Ministry of Health through its PMSU</i></p>

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	<p>f. Carry out an environmental and social audit on the TORs acceptable to the Bank. The audit shall be carried out by qualified, independent environmental and social consultants. At a minimum, the audit shall consider (i) the implementation of social inclusion measures, in accordance with the prioritization schedule set out in the national vaccination and vaccine availability; (ii) proper waste management, including medical waste; (iii) the operation of grievance redress mechanisms; (iv) the protection of the workers involved (application of OHS measures and the use of protective equipment); (v) implementation of vaccine cold storage temperature monitoring plans; and (vi) implementation of Adverse Events Following Immunization (AEFI) plan and any other issues agreed with the Bank.</p>		
1.3.	<p>Maintain national databases of vaccine recipients, and records on monitoring AEFI, in line with the WHO Global Manual on Surveillance of Adverse Events.</p>	<p>Maintain national databases of vaccine recipients and AEFI throughout Project implementation.</p>	<p><i>Ministry of Health</i></p>
<p>ESS 2: LABOR AND WORKING CONDITIONS</p>			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Update, consult, adopt, disclose, and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, OHS (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	<p>Finalize and re-disclose the updated LMP which is a part of the ESMF, no later than 30 days after the Effective Date of the Loan Agreement and thereafter implement the LMP throughout Project implementation.</p> <p>Monitor the LMP throughout Project implementation, and report to the Bank through quarterly (every three (3) months) progress reports commencing on the Effective Date of the Loan Agreement.</p>	<p><i>Ministry of Health through its PMSU</i></p>

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		The LMP and all other measures specified in this action 2.1 shall be applied throughout Project implementation.	
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1.	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above, including, inter alia, measures to: carry out the purchase, storage, transportation and handling of vaccines (including, ultra-cold chain management) in a safe manner and in accordance with the EHSs, and other relevant GIIP including relevant WHO guidelines; and adequately manage and dispose of health care wastes (including, vaccines) and other types of hazardous and non-hazardous wastes.	Throughout Project implementation.	<i>Ministry of Health through its PMSU</i>
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY Relevant aspects of this standard shall be considered, as needed, under action 1.2 above including, <i>inter alia</i> , measures to: minimize the potential for community exposure to communicable diseases; establish and implement appropriate quality management systems to manage the risks and the impacts that services provided and activities carried out under the Project may have on community health and safety; manage the risks of labor influx; and prevent and respond to sexual exploitation and abuse (SEA), and sexual harassment (SH); and prepare and respond to fire emergencies in health care facilities, alternate COVID-19 health care facilities, , if applicable.	Throughout Project implementation.	<i>Ministry of Health through its PMSU</i>
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
	Not relevant		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	Not relevant		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	Not relevant.		
ESS 8: CULTURAL HERITAGE			
	Not relevant.		
ESS 9: FINANCIAL INTERMEDIARIES			
	Not relevant.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN</p> <p>Finalize, re-disclose, adopt and implement the updated Project Stakeholder Engagement Plan (SEP) consistent with ESS10, which shall include measures to, <i>inter alia</i>, 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 - all in a manner acceptable to the Bank. This shall include measures to consult the E&S instruments for the Project.</p>	<p>Draft SEP was disclosed before appraisal. Finalize and re-disclose the updated SEP no later than 30 days after the Effective Date of the Loan Agreement. Continuously update the SEP as needed and apply it throughout the Project implementation.</p>	<p><i>Ministry of Health through its PMSU</i></p>
10.2	<p>GRIEVANCE MECHANISM</p> <p>Accessible grievance arrangements that were already established under the Original Project shall remain publicly available to receive and facilitate resolution of concerns and grievances related 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, and acceptable to the Bank throughout the Project implementation. 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>Maintain and operate the Grievance Mechanism throughout the Project implementation.</p>	<p><i>Ministry of Health through its PMSU</i></p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	The grievance mechanism shall also receive, register, and address concerns arising from unintended health consequences after vaccination especially those resulting in serious adverse effects, and, as appropriate, requests for compensation.		
CAPACITY SUPPORT (TRAINING)			
CS1	The PMSU responsible for the Project to receive training on the Project's ESHS plans and instruments, fair, equitable and inclusive access and allocation of Project benefits (including with regards to vaccines), and the roles and responsibilities of different key agencies in the ESCP implementation.	No later than 60 days of the Effective Date of the Loan Agreement and periodically with the addition of new Project team members throughout Project implementation.	<i>Ministry of Health through its PMSU</i>
	Training health workers on COVID – 19 prevention and treatment protocols.	Throughout Project implementation	<i>Ministry of Health through its PMSU</i>