



Organization of the Black Sea Economic Cooperation

**BLUEING THE BLACK SEA (BBSEA)
GEF REGIONAL PROJECT, P173890**

Draft for Negotiations

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

December 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Organization of the Black Sea Economic Cooperation (hereinafter the **BSEC** or **Recipient**) shall implement Blueing the Black Sea GEF Regional Project (the **Project**), in coordination with the Ministry of Environmental Protection and Agriculture in Georgia; the Ministry of Agriculture, Regional Development and Environment in Moldova; the Ministry of Environment and Urbanization and the Ministry of Agriculture and Forestry in Türkiye; and the Ministry of Energy and Environment Protection in Ukraine. The International Bank for Reconstruction and Development acting as an implementing agency of the Global Environment Facility (hereinafter the Bank) has agreed to provide financing for the Project.
2. BSEC shall 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 including the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, grievance management and the environmental and social assessments and instruments to be prepared or updated, disclosed, consulted, adopted and implemented under the ESCP and the ESSs, all in a manner acceptable to the Bank.
3. BSEC 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 Management Framework (ESMF), Environmental and Social Management Plan (ESMP), Labor Management Procedure (LMP), and Stakeholder Engagement Plan (SEP), Country specific Stakeholder Engagement Plans (SEPs) and the timelines specified in those E&S documents.
4. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Bank by the Recipient - BSEC, as required by the ESCP and the conditions of the legal agreement, and the Bank shall monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
5. As agreed by the Bank and BSEC, 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 Recipient shall agree to the changes with the Bank and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Bank and BSEC. BSEC shall promptly disclose the updated ESCP.
6. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, community and occupational health and safety impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</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 relevant Environmental and Social (E&S) instruments required under the ESCP; including, <i>inter alia</i>, Environmental and Social Management Framework (ESMF), Environmental and Social Management Plans (ESMP), Labor Management Procedures (LMP), Stakeholder Management Plans (SEPs); stakeholder engagement activities; and functioning of the grievance mechanism(s).</p> <p>Include frequency and content of monitoring reports in the Project Operations Manual (POM) and implement accordingly.</p>	<p>Starting 180 days after the Effective Date and then semi-annually (every six months) throughout Project implementation.</p> <p>No later than the Effective Date of the Project.</p>	BSEC PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
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 project workers such as incidents/accidents that result in death, serious or multiple injury, environmental spills or relating to Occupational Health and Safety (OHS) or community health and safety.</p> <p>Provide sufficient detail regarding the incident or accident, findings of the Root Cause Analysis (RCA), indicating immediate measures taken or that are planned to be taken to address it, compensation paid, and any information provided by any contractor and supervising entity/consultant, as appropriate.</p> <p>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>Include in bidding documents of contractors the provisions requiring that prompt notification of such accidents and incidents remain inclusive under contractor’s Environmental and Social Management Plan (ESMP). Ensure and monitor that an incident register at all construction sites is kept by the contractors throughout the Project implementation.</p>	<p>The PIU shall report to the Bank the details of such incidents/accidents within 48 hours after the occurrence of the incident or accident.</p> <p>The BSEC shall require an incident/accident report, including root cause analysis, precautions and compensation measures taken within 30 calendar days of the incident/accident from the PIU, unless a different timeframe is agreed in a manner acceptable to the Bank.</p> <p>The BSEC shall submit the incident report to the Bank promptly upon receipt of the incident/accident report.</p> <p>The BSEC shall maintain the incident/accident notification/reporting system in place throughout the Project implementation.</p>	BSEC PIU
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>Require contractors to provide monthly progress reports on ESHS performance in accordance with the environmental and social metrics specified in the respective bidding documents and contracts, and submit such reports to the Bank when requested, for all Eco-Innovation Subproject sites. The BSEC shall monitor the quality of reporting throughout the duration of works. These reporting requirements shall be incorporated in bidding documents of contractors/grantees.</p>	<p>Upon the commencement of construction for any Eco-Innovation Subproject and continue with monthly reporting throughout Project implementation.</p> <p>Submit the monthly reports to the Bank upon request.</p>	BSEC shall obligate contractors to submit monthly reports
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE		BSEC PIU

	<p>Establish and maintain an organizational structure, the Project Implementation Unit under BSEC, with adequate resources and qualified staff, in a manner acceptable to the Bank, to support the management and monitoring of E&S risks by hiring one social and one environmental specialist who shall be responsible to ensure the compliance of the Project with the ESF and relevant E&S management instruments throughout Project implementation.</p> <p>This organizational structure shall be strengthened with additional E&S staff, if needed, throughout the Project implementation, in a manner acceptable to the Bank.</p> <p>Require contractors for works to assign qualified E&S experts for Eco-Innovation Subprojects' E&S risk management by including this requirement in the bidding documents for works and in their respective contracts.</p>	<p>PIU, including the environmental and social specialists hired, will be established no later than 30 days after the Effective Date of the Project.</p> <p>The organizational structure, including the environmental and social specialists, shall be maintained, and improved as needed, throughout Project implementation.</p>	
<p>1.2</p>	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>Adopt, implement and update as necessary the Environmental and Social Management Framework (ESMF) of the Project, consistent with relevant ESSs and in a manner acceptable to the Bank.</p>	<p>No later than 15 days after the Effective Date, and throughout the Project implementation.</p>	<p>BSEC PIU</p>

1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>Screen any proposed clean-up activity for Ukraine under sub-component 1.2 and any proposed Eco-Innovation Subproject under sub-component 2.1, in accordance with the ESMF prepared for the Project, and, thereafter, draft, disclose, consult upon, adopt, and implement the clean-up activity and the Eco-Innovation Subproject specific Environmental and Social Management Plan (ESMP), as required, in a manner acceptable to the Bank.</p>	<p>BSEC shall submit the screening decision to the Bank and approve the Eco-Innovation Subproject after receiving the Bank’s No-Objection.</p> <p>ESMPs shall be prepared, disclosed, consulted upon by PIU and approved by the Bank before tendering of work for each Eco-Innovation Subproject, and thereafter implemented by works providers throughout civil works contracts in a manner acceptable to the Bank.</p>	BSEC PIU
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including the requirement for ESMPs, SEPs and LMPs, into the ESHS specifications of the procurement documents and contracts with contractors under sub-components 2.1 and 2.2 consistent with the ESMF and in a manner acceptable to the Bank. Thereafter, ensure that the contractors comply with the ESHS requirements of their respective contracts.</p>	<p>Prior to the finalization of relevant tender documents.</p> <p>Supervise contractors throughout Project implementation.</p>	BSEC PIU
1.5	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project [including, inter alia, the preparation activities under sub-components 1.2 and 2.2 of the Project] are carried out in accordance with terms of reference acceptable to the Bank, that incorporate the relevant requirements of the ESSs.</p> <p>Ensure that any outputs from the technical assistance activities, [including, inter alia, the preparation activities under sub-components 1.2 and 2.2 of the Project] are consistent with the ESSs.</p>	<p>ToR for preparation activities to be submitted to Bank’s review prior to finalization for tendering.</p> <p>Throughout the Project implementation</p>	BSEC PIU
<p>ESS 2: LABOR AND WORKING CONDITIONS</p>			

<p>2.1</p>	<p>LABOR MANAGEMENT PROCEDURES</p> <p>The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Bank, including through, inter alia, implementing adequate occupational health and safety measures (including personal protective equipment and emergency preparedness and response measures), setting out grievance arrangements for Project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms(including requirements relating to sexual exploitation and abuse (SEA) and sexual harassment (SH). Project workers shall sign the Code of Conduct upon the commencement of employment.</p> <p>Adopt and implement labor management procedures (LMP), which have been prepared prior to project Appraisal, consistent with requirements under national law and ESS2 and ensure that Project workers are informed of and have access to these policies.</p> <p>BSEC shall obligate contractors to prepare labor management procedures, in line with Project LMP.</p>	<p>Implement and monitor labor management procedures starting on the Effective Date and thereafter throughout Project, and report through semi-annually (every 6 months) progress reports.</p> <p>Contractors shall prepare labor management procedures, which shall be reviewed and approved by BSEC, no later than 30 days after the Signature Date of the contract with BSEC.</p>	<p>BSEC PIU</p>
<p>2.2</p>	<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 GM shall be adapted to receive sexual exploitation and abuse and sexual harassment (SEA/SH) complaints.</p> <p>Contractors shall operate GMs for contracted workers as described in the LMP and consistent with ESS2.</p>	<p>Grievance mechanism shall be operational within 15 days following Effective Date and maintained throughout Project implementation.</p> <p>Contractors shall operationalize GM for contracted workers no later than 30 days after the Signature Date of the contract with BSEC.</p> <p>Report semiannually (every six months) on GM through Project Progress Reports.</p>	<p>BSEC PIU</p>

2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Prepare, adopt, and implement occupational, health and safety (OHS) measures that are specified in the LMP in the ESMP for Eco-Innovation Subprojects.</p> <p>Ensure that contractors develop, implement and maintain OHS plan(s) for their work/ grant projects.</p> <p>Monitor that occupational health and safety standards are met at workplaces in line with national occupational health and safety legislation, ESS2 OHS requirements, and WHO and WB guidelines on COVID-19 prevention, all in a manner acceptable to the Bank.</p>	<p>Before commencement of Eco-Innovation Subproject tendering and calls for grants and throughout Project implementation.</p> <p>Before the commencement of Eco-Innovation Subprojects</p> <p>Throughout Project implementation and report in semi-annual (six months) project progress reports.</p>	BSEC PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Include measures to prevent and/or minimize generation of environmental emissions, discharges and wastes and use of resources (water, materials, energy, etc.) efficiently during construction and operation of Eco-Innovation Subprojects in the Eco-Innovation Subproject specific ESMPs under Action 1.2 above and ensure application of these measures during Eco-Innovation Subproject implementation, consistent with ESS3 requirements and in a manner acceptable to the Bank.</p> <p>Relevant aspects of these standards shall be considered as needed, under action 1.2 above including, inter alia, measures to: minimize the construction related impacts such as dust, noise, waste management, ensure integration of energy and materials efficiency measures, all in a manner acceptable to the Bank.</p>	<p>Prior to tendering of works for each Eco-Innovation Subproject and implement thereafter.</p> <p>Apply mitigation and monitoring plans throughout Project implementation and report in semi-annual (six months) project progress reports.</p>	BSEC PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			

4.	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Adopt and implement measures and actions to assess and manage specific risks and impacts to the community health and safety arising from Project activities and ensure these measures are included in the ESMPs, which shall be prepared in accordance with the ESMF, in a manner acceptable to the Bank, consistent with ESS4 requirements and in a manner acceptable to the Bank.</p> <p>Relevant aspects of this standard shall be considered, as needed, under action 1.2 above including, inter alia, measures to: minimize the potential for community exposure to communicable diseases; 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 Project; and prevent and respond to SEA/SH, all in a manner acceptable to the Bank.</p>	<p>Prior to commencement of Eco-Innovation Subproject works and throughout the Project implementation and report in semi-annual (six months) project progress reports.</p>	BSEC PIU
<p>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</p>			
<p>ESS5 is not relevant to the Project.</p>			
<p>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</p>			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Identify, describe and design mitigation and monitoring measures for biodiversity risks and impacts in the Eco-Innovation Subproject specific ESMPs to be prepared under Action 1.2 above, consistent with ESS6 requirements and in a manner acceptable to the Bank.</p>	<p>Prior to tendering of works for each Eco-Innovation Subproject and implement thereafter.</p> <p>Apply mitigation and monitoring plans throughout Project implementation and report in semi-annual (six months) project progress reports.</p>	BSEC PIU
<p>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</p>			
<p>ESS7 is not relevant to the Project.</p>			
<p>ESS 8: CULTURAL HERITAGE</p>			
8.1	<p>CHANCE FINDS</p> <p>Prepare, adopt, and implement a chance finds procedure for cultural assets described in the Eco-Innovation Subproject specific ESMPs developed for the Project under Action 1.2 above.</p> <p>Chance Finds Procedure shall be included into all civil works contracts.</p>	<p>Implement chance find procedures included in the ESMPs, in each instance when a chance find occurs, throughout the implementation of the Project.</p>	BSEC PIU
<p>ESS 9: FINANCIAL INTERMEDIARIES</p>			
<p>ESS9 is not relevant to the Project.</p>			

ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION		
	<p>Adopt and implement the 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.</p> <p>BSEC shall prepare, disclose, consult upon, adopt and implement the national SEPs, and regularly carry out stakeholder engagement activities in line with the Project SEP, consistent with ESS10 and in a manner acceptable to the Bank.</p>	<p>Adopt SEP no later than 15 days after the Effective Date and thereafter implement throughout the Project implementation.</p> <p>30 days before commencement of any sub-project financed in the beneficiary countries.</p>	BSEC
10.2	PROJECT GRIEVANCE MECHANISM		
	<p>Establish, publicize, maintain, and operate accessible grievance mechanism(s), 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, as described in the SEP.</p> <p>Assign staff to manage and monitor project grievances, in a manner acceptable to the Bank.</p> <p>The grievance mechanism(s) shall be equipped to receive, register, and address concerns and grievances related to SEA/SH in a safe, and confidential and survivor-centric manner, including through the referral of survivors to gender-based violence service providers.</p> <p>Ensure that GM, in line with SEP, is established for the Eco-Innovation Subprojects in beneficiary countries.</p>	<p>Project GM shall be operational no later than 15 days after the Effective Date of the Project and thereafter implemented throughout the Project implementation.</p> <p>Reporting – Semi- annually in progress reports.</p> <p>30 days before commencement of any sub-projects financed in the beneficiary countries.</p>	BSEC
CAPACITY SUPPORT (TRAINING)			

CS1	<p>Training for BSEC, Eco-Innovation Subprojects proponents on:</p> <ul style="list-style-type: none"> - WB’s ESF - preparation of ESMP, SEP, LMP (E&S Instruments) - stakeholder engagement - Grievance mechanism - Monitoring and reporting of E&S performance - Covid-19 prevention measures 	<p>Within the first year of the Project implementation, and before start of the Project activities under Component 2</p>	<p>BSEC where relevant, with the support of the Bank</p>
CS2	<p>Training for Eco-Innovation Subproject proponents on:</p> <ul style="list-style-type: none"> - international standards on occupational health and safety - emergency preparedness - grievance mechanism - Community health and safety - COVID 19 prevention measures 	<p>Before the commencement of approved Eco-Innovation Subprojects.</p>	<p>BSEC where relevant, with the support of the Bank</p>