

Community and Family Services International (CFSI)

Bangsamoro Camps Transformation Project (BCTP)

Project ID: P180320

FINAL
ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)

19 June 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Community and Family Services International (“Recipient”) will implement the Bangsamoro Camps Transformation Project (the Project), as set out in the Grant Agreement. The International Bank for Reconstruction and Development/International Development Association (“Bank”), acting as the administrator of the Bangsamoro Normalization Trust Fund, has agreed to provide financing USD 4,000,000 for the Project, as set out in the referred agreement(s).
2. The Recipient 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(s).
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 and actions 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, 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, CFSI and the World Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Executive Director of the Recipient. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
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>	Submit quarterly reports to the Bank throughout Project implementation, commencing after the signing of the Grant Agreement. Submit each report to the Bank no later than 30 days after the end of each reporting period.	CFSI Executive Director supported by the Chief of Staff (COS)
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, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury gender-based violence and/or violence against minors, vehicular accidents, outbreak of infectious diseases, etc. 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>	CFSI Executive Director supported by the Deputy Executive Director (DED)
C	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts, and submit such reports to the Bank.</p>	Submit the monthly reports to the Bank	CFSI Executive Director supported by the Programme Officer (PO)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain an Environmental and Social Safeguards Team with qualified staff and resources to support the management of environmental and social risks and impacts as well as ESHS aspects of the Project including a designated Environmental and Social Safeguards Officer.</p>	<p>Establish, within one (1) month after signing of the Grant Agreement and thereafter, maintain a Safeguards Team as part of the Project Team as set out in the Grant Agreement.</p> <p>Designate an Environmental and Safeguards Officer at the start of the project; and thereafter maintain this Position throughout Project implementation.</p>	CFSI Executive Director supported by the DED
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>1. Adopt and implement an Environmental and Social Safeguards Checklist (ESSC), and corresponding Environmental and Social Management Plan (ESMP) or an Environmental Code of Practice (ECOP), as the case may be, for Community Infrastructure Sub-Project (CISP). Any proposed Community Infrastructure Sub-Project described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</p> <p>2. Adopt and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p> <p>3. For Third Party Services Providers (Contractors) to adopt and implement the Community Infrastructure Sub-Project in select camp communities, Environmental and Social Safeguards Checklist and Environmental and Social Management Plan (ESMP) or an Environmental Code of Practice (ECOP), as set out in the ESMF.</p>	<p>1. Adopt the ESSC and ESMP or ECOP prior to approval of sub-projects, and thereafter implement and monitor the ESSC and ESMP or ECOP throughout Project implementation.</p> <p>2. Adopt the ESMF prior to the start of Project Implementation, and thereafter implement the ESMF throughout Project implementation.</p> <p>3. Adopt the ESMP or ECOP prior to the carrying out of Community Infrastructure Sub- Projects that requires the adoption of such ESMP or ECOP. Once adopted, implement and monitor the respective ESMP or ECOP throughout Project implementation.</p>	CFSI Executive Director supported by the PO
1.3	<p>MANAGEMENT OF CONTRACTORS</p>	<p>Include in the preparation of procurement documents and respective contracts.</p>	CFSI Executive Director supported by the PO

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	Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.	Supervise contractors throughout Project implementation.	
1.4	TECHNICAL ASSISTANCE Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.	Throughout Project implementation.	CFSI Executive Director supported by the PO
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Adopt and implement the Labor Management Procedures (LMP) as part of the ESMP or EOP and Project Operations Manual (OM) for the Project, including, inter alia, promote diverse work force, provisions on safe working conditions, management of workers relationships, occupational health and safety (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.	Adopt the LMP as part of the Project Operations Manual prior to the start of Project implementation, and thereafter implement and monitor the LMP throughout Project implementation.	CFSI Executive Director supported by the DED
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, as described in the LMP in the Project Operations Manual (POM) and consistent with ESS2.	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	CFSI Executive Director supported by the DED

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ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>TPSPs will be required to prepare, adopt and implement an Ecological Waste Management Plan (EWMP) for their respective sub-project(s). The EWMP requirement will be included as part of the bidding documents.</p> <p>The ESMF provides the guidance and requirements for preparing the site-specific and sub-project-specific EWMP.</p>	Adopt the EWMP (as part of the ESMF) prior to the start of the Project, and thereafter implement the EWMP throughout Project implementation.	CFSI Executive Director supported by the PO
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the EWMP or ECOP.</p>	Same timeframe as the adoption and implementation of the ESMF, ESMP or ECOP, upon sub-project proposal approval.	CFSI Executive Director supported by the PO
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.2 above.</p>	Same timeframe as the adoption and implementation of the ESMP or ECOP.	CFSI Executive Director supported by the PO
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities, including, possible outbreaks of infectious diseases in the community brought by project workers, and short-term pollution due to construction activities, and include mitigation measures in the ESMPs or ECOPs to be prepared in accordance with the ESMF.</p>	Same timeframe as the adoption and implementation of the ESMPs or ECOPs.	CFSI Executive Director supported by the PO
4.3	<p>SEA AND SH RISKS</p> <p>Implement measures to address GBV, SEAH, and Child Protection risks and impacts that may arise during Project implementation such as orientation of all partners on the GBV, Protection from Sexual Exploitation, Abuse and Harassment (PSEAH), Child Protection Policy, and Whistleblowing Policy.</p>	Adopt the GBV, PSEAH, and Child Protection Policies prior to start of Project and thereafter implement the GBV, PSEAH, and Child Protection Policies throughout Project implementation.	CFSI Executive Director supported by the DED

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4.4	<p>SECURITY MANAGEMENT</p> <p>Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, as set out in the ESMF. The Project team will manage security through proper and timely coordination with local stakeholders and by following the coordination protocols set by the parties of the GPH-MILF peace process. This includes regular coordination with the camp JTFCTs, MILF and government counterparts, UN agencies, Civil Society Organizations, and community members who understand the local dynamics in the area.</p>	Adopt the ESMF prior to the start of the Project, and thereafter implement ESMF throughout Project implementation.	CFSI Executive Director supported by the PO
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT POLICY FRAMEWORK</p> <p>Sub-projects that may involve resettlement shall be included in the negative list in the ESMF and shall not be supported under the Project.</p>	Adopt the ESMF prior to the start of the Project, and thereafter implement the ESMF throughout Project implementation.	CFSI Executive Director supported by the PO

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ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS No sub-projects will be implemented in protected areas and critical natural habitats . These are on the BCTP Negative List. The ESSC tool of the ESMF will screen sub-projects based on the possible impact on the biodiversity of the select sites.	Adopt the ESMF prior to the start of the Project, and thereafter implement throughout Project implementation.	CFSI Executive Director supported by the PO
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	INDIGENOUS PEOPLES PLANNING FRAMEWORK Adopt and implement an Indigenous Peoples Planning Framework (IPPF) for the Project, consistent with ESS7.	Adopt the IPPF prior to the start of Project, and thereafter implement the IPPF throughout Project implementation.	CFSI Executive Director supported by the PO
7.2	GRIEVANCE MECHANISM Prepare, adopt, and implement arrangements for the Grievance Redress Mechanism (GRM) for Indigenous Peoples and/or communities. The IP GRM will include provisions for using indigenous systems and procedures in addressing concerns from IP groups. Working closely with the IP leaders and elders in ensuring that a socially and culturally acceptable resolution to the concern is reached. IP GRM will also be documented, including challenges and lessons learned, for adoption and improvement in similar future intervention in IP communities.	Adopt the ESMF prior to the start of Project Implementation. Once adopted, implement the IP GRM throughout Project Implementation.	CFSI Executive Director supported by the DED
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS IPs are also involved in community infrastructure sub-project site identification thus unlikely to pose risk of damaging a cultural property, as stated in the ESMF.	Adopt the ESMF prior to the start of Project implementation, and thereafter implement and monitor the ESMF throughout Project implementation.	CFSI Executive Director supported by the PO

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8.2	<p>CHANCE FINDS</p> <p>Describe and implement the chance finds procedures, as part of the ESMF of the Project.</p>	<p>Chance finds procedure will ensure that the chance find item will not be disturbed until responsible authorities/specialists arrived in the area as described in the ESMF. Implement the procedures throughout Project implementation.</p>	<p>CFSI Executive Director supported by the PO</p>
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Adopt and implement 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>	<p>Prepare and disclose the draft SEP prior to the appraisal and adopt the SEP prior to the start of the Project, and thereafter implement the SEP throughout Project implementation. The SEP may be updated as needed and subsequently re-disclosed.</p>	<p>CFSI Executive Director supported by the PO</p>
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>CFSI will prepare, adopt, maintain, and operate a Grievance Redress Mechanism (GRM), as described in the SEP, that builds on the GRM applied throughout Reconstruction and Development Project Phase Three, financed by the Mindanao Trust Fund.</p> <p>In case of a GBV, SEAH, and child protection violation or complaint arise, during project implementation, a separate confidential report will be shared to the Bank within 24 hours upon learning about the incident.</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 the grievance mechanism prior to the start of the Project, and thereafter maintain and operate the mechanism throughout Project implementation.</p>	<p>CFSI Executive Director supported by the DED</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
CAPACITY SUPPORT			
CS1	<p>Training may be required for BCTP Project Team, the Joint Task Forces on Camps Transformation (JTFCTs), Cooperatives, volunteers, and TPSPs on:</p> <ul style="list-style-type: none"> • Environmental and Social Management Framework (ESMF) • Stakeholder Engagement Plan (SEP) • Emergency preparedness and response • Baseline data gathering and Mapping approaches • ESSC and ESMP, ECOP Preparation and Monitoring • PSEAH, Child Protection, Whistleblowing Policies and GBV • GRM <p>For BCTP Project Team:</p> <ul style="list-style-type: none"> • Baseline data gathering and Mapping approaches • Documentation of project activities/grievances/lessons learned • UN Security Awareness • IP Awareness 	<p>Project Team to be trained during On-boarding Activity (approximately within the first 2 months of project implementation)</p> <p>JTFCTs: During Project Orientation (First 2 months of the project)</p> <p>TPSPs: Contractor's Orientation (after Contract Signing)</p> <p>Project Workers and Community Workers: During Pre-Implementation Meeting</p>	CFSI Executive Director supported by the COS and PO
CS2	<p>Specify training for Project workers on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.</p> <p>Training may be required for BCTP Project Team and TPSPs on:</p> <ul style="list-style-type: none"> • Operational Health and Safety • First Aid and Basic Life Support 	<p>Project Team to be trained (approximately within the first 2 months of project implementation)</p> <p>TPSPs: Contractor's Orientation (after Contract Signing)</p>	CFSI Executive Director supported by the COS and PO