

The Republic of Djibouti

Regional Integration Digital Project

Environmental and Social Commitment Plan (ESCP)

Draft

SEPTEMBER 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Djibouti (the Beneficiary) will implement the Regional Project for Digital Integration in association with the Ministry of Communication, in charge of Posts and Telecommunications (MCPT), as indicated in the Financing Agreement. The International Development Association (the Association), acting as Trustee, has agreed to provide funding 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 (ESS) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is part of the Financing Agreement and the Project Agreement. Unless otherwise defined in this ESMP, 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 that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, the said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient, through the MCPT and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient. The Recipient shall promptly disclose the update ESCP.

MATERIAL MEASURES AND ACTIONS		TIMETABLE	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTS</p> <p>Prepare and regularly submit to the Association monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including, but not limited to, the implementation of the ESCP, the degree of preparation and implementation of the environmental and social instruments required under the ESMP, stakeholder engagement activities, the functioning of the grievance management mechanism(s), and implementation and monitoring of the Project's environmental and social instruments and mitigation measures.</p>	<p>Provide quarterly reports to the Association throughout the implementation of the project from the Effective Date. Communicate no later than five (05) days after the end of each reporting period.</p>	<p>MCTP Project Implementation Unit (PIU)</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association without delay of any incident or accident in connection with the Project which has or is likely to have serious consequences for the environment, affected communities, the public or personnel, including, but not limited to, cases of sexual exploitation and abuse (SEA), sexual harassment (SH) and accidents resulting in death or serious injury. Provide sufficient details of the extent, severity and possible causes of the incident or accident, indicating the measures taken or to be taken without delay to deal with it, and any information made available by any suppliers and service providers and/or the main contractor, as appropriate.</p> <p>Subsequently, at the Association's request, prepare a report on the incident or accident and propose measures to remedy it and prevent its recurrence.</p>	<p>Notify the Association of the incident or accident within 48 hours of becoming aware of it.</p> <p>Then submit a report to the Association within a timeframe acceptable to the Association.</p>	<p>MCTP PIU</p>
C	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require suppliers and prime contractors to produce monthly ESHS performance monitoring reports in accordance with the indicators specified in the respective tender documents and contracts and communicate these reports to the Association.</p>	<p>Provide monthly reports to the Association on request as annexes to the reports to be submitted under action A above.</p>	<p>MCTP PIU</p> <p>Suppliers, contractors, and service providers</p>

MATERIAL MEASURES AND ACTIONS		TIMETABLE	RESPONSIBLE ENTITY
D	<p>NOTIFICATIONS RELATING TO DAAB COMPLIANCE REVIEW OF CONTRACTOR COMPLIANCE WITH SEA/SH PREVENTION AND RESPONSE OBLIGATIONS</p> <p>Notify the Association of any request submitted to the Dispute Avoidance and Resolution Board (DAAB) with a view to initiating a procedure to review compliance by suppliers or service providers with the obligations to prevent or combat sexual exploitation and abuse (SEA) and/or sexual harassment (HS) as specified in the works contract with said suppliers or service providers; and, in the event that such a request is submitted, notify the Association of: (i) the DAAB's decision regarding such claim; (ii) the supplier's or service provider's notice of dissatisfaction, if any, with such DAAB's decision; (iii) any notice received at the commencement of emergency arbitration proceedings or full arbitration proceedings regarding the DAAB's decision; and (iv) the resulting emergency arbitration order and/or resulting full arbitration order, if any.</p>	<p>No later than seven days after issuance or receipt, as applicable, of the relevant document (i.e., application to DAAB, DAAB decision, notice of dissatisfaction, notice of commencement of emergency/full arbitration, emergency/full arbitration order, as the case may be).</p>	<p>MCTP PIU</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Maintain Project Implementation Unit (PIU) with qualified staff and sufficient resources to support the management of the Project's ESHS risks and impacts, including an environmental specialist, a social development specialist.</p>	<p>Maintain a PIU as outlined in the funding agreement. Recruit an environmental specialist and a social development specialist no later than 90 days after the project effective date and maintain these positions throughout project implementation.</p>	<p>MCPT</p>
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <ol style="list-style-type: none"> 1. Prepare, adopt, and implement an Environmental and Social Management Framework (ESMF) for the Project, in accordance with the relevant ESS. 2. Adopt and carry out an Environmental and Social Impact Assessment (ESIA) and implement the corresponding Environmental and Social Management Plans (ESMPs) and Resettlement Plans (RP) based on the provisions recommended in the ESMF and Resettlement Framework (RF). Proposed sub-project activities described in the exclusion list in the ESMF are not eligible for financing under the project. 3. Adopt and implement a RF, in accordance with the relevant ESS. 	<ol style="list-style-type: none"> 1. Adopt the ESMF before the board approval, then apply the ESMF throughout project implementation. 2. Adopt the ESIA and ESMP before launching the tender for the specific sub-project activity, then carry out a site-specific ESIA and apply the ESMP. Once adopted, the ESIA/ESMP will be implemented throughout the implementation of the sub-project. 3. Adopt the RF before the Project approval, then apply the RF throughout Project implementation. 	<p>MCTP PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMETABLE	RESPONSIBLE ENTITY
	4. Prepare and adopt and implement an action plan to prevent and respond to gender-based violence (GBV), including Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) to be included as annex to ESMF.	4. Before board approval	
1.3	MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including relevant environmental and social instruments, labor management procedures (LMP) and code of conduct (CoC), into the ESHS specifications of the tender documents issued to contractors and primary suppliers. Then, ensure that these contractors comply, and that their subcontractors comply, with the ESHS specifications in their respective contracts.	Within the framework of the respective contracts. Supervise contractors throughout project implementation.	MCPT PIU
1.4	TECHNICAL ASSISTANCE Ensure that consultations, studies (including feasibility studies), capacity-building activities, training, and any other technical assistance activities within the framework of the Project are carried out in accordance with terms of reference acceptable to the Association and consistent with the ESS. Thereafter, ensure that the outputs of these activities comply with the terms of reference.	Throughout project implementation.	MCPT PIU
1.5	CONDITIONAL [EMERGENCY] [EARLY] RESPONSE FINANCING 1. Ensure that the Conditional Emergency Response Component (CERC) Manual as referred to in the legal agreement includes a description of the ESHS assessment and management arrangements, [including, the ESMF-CERC to be referred to in the CERC Manual] for the implementation of the CERC Part, in accordance with the ESS. 2. Adopt any environmental and social instruments that may be required for activities under the CERC Part of the Project, in accordance with the CERC Manual and the ESS, and thereafter implement the necessary measures and actions in application of such environmental and social instruments within the timeframes set out in such instruments.	1. The adoption of the CERC manual and, in substance and form acceptable to the Association, is a condition of withdrawal under Section [XX] of Appendix 2 of the Legal Agreement for the Project. 2. Adopt any required environmental and social instruments and include them in the respective tendering procedures, where applicable, and in any event prior to the implementation of the relevant project activities for which the environmental and social instrument is required. Implement the environmental and social instruments in accordance with the conditions stipulated therein,	MCPT PIU

MATERIAL MEASURES AND ACTIONS		TIMETABLE	RESPONSIBLE ENTITY
		throughout the implementation of the Project.	
1.6	<p>PERMITS, APPROVALS AND AUTHORIZATIONS:</p> <p>The Beneficiary will ensure that it obtains the necessary permits, approvals, and authorizations from the competent national authorities; it undertakes to comply with and ensure compliance with the conditions associated with these permits, approvals, and authorizations throughout the implementation of the Project.</p>	Before starting any activity requiring a permit or authorization.	<p>MCPT PIU</p> <p>General Managers of enabling executing agencies</p>
ESS 2 : LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt and implement labor management procedures (LMP) established for the Project, including, among others, provisions on working conditions, management of the employer-worker relationship, occupational health and safety (OHS), including personal protective equipment and emergency preparedness and response, the code of conduct (particularly with regard to sexual exploitation and abuse and sexual harassment), forced labor, child labor, the Project's worker complaint management mechanism, and requirements applicable to suppliers and contractors, subcontractors and the prime contractor.</p>	Adopt labor management procedures prior to the project approval, then apply these procedures throughout the Project's implementation.	MCPT PIU
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and make operational a grievance mechanism (GM) for Project workers, as described in the workforce management procedures and in accordance with the provisions of ESS n° 2, and consistent with ESS10.</p>	Establish the grievance mechanism (GM) before recruiting Project workers for the Project, then maintain and operate it throughout Project implementation.	MCP PIU and suppliers/providers.
2.3	<p>EMERGENCY PREPAREDNESS AND RESPONSE:</p> <p>Ensure that suppliers and service providers whose activities require it, develop, and implement an emergency preparedness plan and ensure coordination with the measures referred to in section 4.4 below. The emergency preparedness plan will comply with national regulations and the Association's environmental and social standards. In particular, the plan will include a section on the identification of potential sources of external aggression (natural risk, man-made risk, etc.), and will specify the means of combating and responding to accidents, fire, terrorist attacks, etc. In addition, the plan must specify all stages of alert processing at all levels: alerting external emergency services, alerting the authorities, informing the media, etc.</p> <p>The Beneficiary shall immediately notify the Association of any major emergency.</p>	Before the start of activities and when necessary.	MCPT PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

MATERIAL MEASURES AND ACTIONS		TIMETABLE	RESPONSIBLE ENTITY
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Adopt and implement a management plan for hazardous and non-hazardous e-waste, in compliance with ESS n° 3.</p>	Before the start of project activities	MCPT PIU
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Adopt measures and actions to manage the waste and hazardous materials described in the ESMF to prevent pollution and use safe handling of any hazardous materials.</p> <p>Similarly, as part of the environmental and social assessment of each sub-project, it will ensure that all sources of pollution (liquid, solid and gaseous) are identified and analyzed, and that appropriate specific mitigation measures are developed and implemented.</p> <p>These measures and actions will be specified in the ESMP.</p> <p>The Beneficiary will ensure that the project partner and contractors/service providers develop and implement a waste and hazardous materials management plan.</p>	Same deadlines as for ESMP adoption and implementation under Section 1.2 (2) above.	MCPT PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Include traffic and road safety risk management measures in the ESMP to be prepared under action 1.2 above.</p>	Same deadlines as for the adoption and implementation of the ESMP under Section 1.2 (2) above.	MCPT PIU
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage the risks and impacts of Project activities on local populations, including SEA/SH issues and the dissemination of information concerning risk mitigation measures and the behavior of Project workers, and include mitigation measures in the ESMF.</p> <p>Prepare a Security Management Plan (SMP) based on the Security Risk Assessment (SRA), setting out the measures planned to ensure safety and mitigate risks, and include it in the appendix to the ESMF.</p>	Same deadlines as for the adoption and implementation of ESMF under Section 1.2 (2) above.	MCPT PIU
4.3	<p>SEA AND SH RISKS</p> <p>Adopting and implementing an SEA/SH Action Plan is part of the ESMF and ESMP to assess and manage SEA/SH risks. Particular attention will be paid to sensitive plains such as GBV/SEA/SH and their management in line with a survivor-centered approach.</p>	Within six (06) months of Effectiveness Date and implemented prior to the start of construction throughout the project life cycle.	Project coordinator with support from the project's social focal point consultant
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			

MATERIAL MEASURES AND ACTIONS		TIMETABLE	RESPONSIBLE ENTITY
5.1	<p>RESETTLEMENT FRAMEWORK</p> <p>Adopt and implement a RF for the Project, in accordance with ESS n° 5.</p>	Adopt the RF before the Project approval, and then apply this RF throughout Project implementation.	MCPT PIU
5.2	<p>RESETTLEMENT PLANS</p> <p>Adopt and implement a resettlement plan (RP) for each Project activity for which the RF requires such a plan, in accordance with ESS n° 5.</p>	Adopt and implement the respective Resettlement Plans, including ensuring that before taking possession of land and related assets, full compensation has been provided and displaced people have been resettled and relocation allowances have been granted.	MCPT PIU
5.3	<p>GRIEVANCE MECHANISM</p> <p>Through the PIU, ensure the development and implementation of the Grievance Mechanism (GM), to which complaints and feedback on the implementation of Project activities can also be directed.</p>	Before work begins on sub-projects requiring RPs	MCPT PIU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Implement the biodiversity management measures set out in the ESMF prepared for the Project, and in accordance with the ESS.</p>	Adopt the biodiversity management plan (BMP) before the project approval, and apply it throughout the project's implementation.	MCPT PIU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES [See examples of possible actions below that can be used if determined that ESS7 is relevant, as set out in paragraph 54 of the E&S Policy and paragraphs 8-10 of ESS7].			
	NA		
ESS 8 : CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE RISKS AND IMPACTS</p> <p>Ensure that the environmental and social impact assessments examine the direct, indirect and cumulative impacts that the Project could have on cultural heritage, as well as the risks it presents in this respect, and take all necessary steps to ensure the protection of cultural assets, in particular by adopting the mitigation hierarchy and developing a Cultural Heritage Management Plan, if required, in accordance with ESS no. 8 as described in the ESMF and the ESIA/ site-specific ESIA.</p> <p>Examine the Project's potential direct, indirect, and cumulative impacts on, and risks to, cultural heritage, and adopt and implement a Cultural Heritage Management Plan (CHMP) as part of the ESMP and in accordance with ESS no. 8.</p>	Before the start of project activities	MCPT PIU

MATERIAL MEASURES AND ACTIONS		TIMETABLE	RESPONSIBLE ENTITY
8.2	<p>CHANCE FINDS</p> <p>Describe and implement the chance find procedures as described in the Project's ESMF in accordance with national legislation and the provisions of ESS N°8. Clauses on such discoveries will be included in all works contracts, even in cases where the probability is very low.</p>	Apply these procedures throughout project implementation.	MCPT PIU
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, in line with the provisions of ESS n° 10, which includes measures to provide stakeholders with up-to-date, relevant, understandable, and accessible information, and to consult with them in a culturally sensitive manner, free from manipulation, interference, coercion, discrimination and intimidation.</p>	Adopt the SEP prior to Appraisal, and thereafter apply the SEP throughout the project's implementation.	MCPT PIU
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism (GM), to hear suggestions, concerns and receive complaints about the Project and facilitate their resolution, in a manner that is prompt, efficient, transparent, respectful of local culture and easily accessible to all parties affected by the Project, free of charge or retribution, including concerns raised and complaints made anonymously, in accordance with ESS n° 10.</p> <p>The complaints management mechanism is equipped to receive, record, and facilitate the resolution of complaints concerning sexual exploitation and abuse and sexual harassment, referring survivors to competent gender-based violence providers in a safe, confidential, and survivor-centered manner.</p>	Establish the grievance mechanism before the start of Project activities and maintain the GM throughout Project implementation.	MCPT PIU
CAPACITY SUPPORT			
RC1	<ul style="list-style-type: none"> - Target group: PIU, implementing partner agencies, stakeholders, Steering Committee, Project component heads. - Training modules: - The Bank's new Environmental and Social Framework (ESF), - Occupational health and safety, including risks related to the use of safety personnel, COVID-19 - Complaints management mechanism, including the filing and processing of claims -EAS/HS /VCE/VAC risk awareness; EAS/HS prevention and response action plan, 	At the start of the project and at regular intervals during project implementation	MCPT PIU

MATERIAL MEASURES AND ACTIONS		TIMETABLE	RESPONSIBLE ENTITY
	including CoPs.		
RC2	<p>Target group: Beneficiaries/ local communities/ authorities/ NGOs</p> <p>Training modules :</p> <ul style="list-style-type: none"> - GRM registration and processing procedure - EAS/HS risk awareness, EAS/HS prevention and response action plans and codes of conduct - Community safety and security, including road safety, prevention of the spread of COVID-19, STDs and STIs - 	At the start of the project and at quarterly intervals during project implementation	MCPT PIU
	<p>Target group: <i>Suppliers/Partners/Subcontractors and workers</i></p> <p>Training modules:</p> <ul style="list-style-type: none"> - Work and working conditions module, - Employment conditions in accordance with national labor laws and codes of conduct for suppliers, contractors, and subcontractors - Child labor and minimum age of employment rules. - EAS/HS complaints mechanism module, - Procedure for recording and handling complaints, archiving, <ul style="list-style-type: none"> - Occupational health and safety, including the prevention of emergencies, and how to prepare for and respond to such situations, including the risks associated with the use of security personnel, COVID-19; STDs and HIV/AIDS - Workforce management procedures, including GRM of workers - Workers' Grievance Mechanism - Incident reporting and implementation of corrective measures -Waste management 	At the start of the project and at quarterly intervals during project implementation	MCPT's PIU and companies