# THE FEDERAL DEMOCRATIC REPUBLIC OF ETHIOPIA

## MINISTRY OF INNOVATION AND TECHNOLOGY

Eastern Africa Regional Digital Integration Project (EARDIP) SOP-II (P180931)



(Draft) Environmental and Social Commitment Plan (ESCP)

> September, 2023 Addis Ababa, Ethiopia

#### ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

- 1. The Federal Democratic Republic of Ethiopia (the Recipient) will implement the Eastern Africa Regional Digital Integration Project SOP-II (the Project) with the involvement of the Ministry of Innovation and Technology (MInT), as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide financing for the Project as sets out in the referred agreement.
- 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 Association. The ESCP is part of the Financing 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 carryout 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, 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 and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient, through MInT, and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Minister for MInT. The Recipient shall promptly disclose the updated ESCP.

| MATER | RIAL MEASURES AND ACTIONS  | TIMEFRAME  | RESPONSIBILE<br>ENTITY/AUTHORITY   |
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|       | MONITORING AND REPORTING   |  |  |
| A     | <b>REGULAR REPORTING</b><br>Prepare and submit to the Association regular monitoring reports on the<br>Environmental, Social, Health and Safety (ESHS) performance of the<br>Project, including, but not limited to, the implementation of the ESCP,<br>status of preparation and implementation of E&S instruments required<br>under the ESCP, stakeholder engagement activities, and functioning of<br>the grievance mechanisms.   | Submit quarterly ESHS performance reports<br>of the Project to the Association throughout<br>project implementation, commencing after<br>the effective date. Submit each report to the<br>Association no later than 30 days after the<br>end of each reporting period. | Project Implementation<br>Unit (PIU) at the<br>Ministry of Innovation<br>and Technology (MInT) |
| В     | <b>INCIDENTS AND ACCIDENTS</b><br>1) Promptly notify the Association of any incident or accident related to<br>the Project which has, or is likely to have, a significant adverse effect on<br>the environment, the affected communities, the public or workers,<br>including, inter alia, cases of Sexual Exploitation and Abuse (SEA),<br>Sexual Harassment (SH) and accidents that result in death, serious or<br>multiple injury. Provide sufficient detail regarding the scope, severity, and<br>possible causes of the incident or accident, indicating immediate measures<br>taken or that are planned to be taken to address it, and any information<br>provided by any contractor and supervising entity, as appropriate. | 1) Report to the Association within 48 hours<br>after learning of the incident or accident.  | PIU at MInT  |
|       | 2) Subsequently, as per the Association's request, prepare a report on the incident or accident root cause analysis and propose any measures to address it and prevent its recurrence in line with the ESIRT procedures.   | 2) Provide subsequent report to the Association within a timeframe acceptable to the Association, as requested.  |  |
| С     | <b>CONTRACTORS MONTHLY REPORT</b><br>Require contractors and supervising firms to provide monthly monitoring<br>reports on ESHS performance in accordance with the metrics specified in<br>the respective bidding documents and contracts (including C-ESMPs to be<br>prepared by Contractors before commencement of any construction<br>activities) and submit such reports to the Association.   | Submit the monthly report (including<br>implementation status of C-ESMPs) to the<br>Association upon request, as annexes to the<br>reports to be submitted under action A above.   | PIU at MInT  |
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| MATER | RIAL MEASURES AND ACTIONS  | TIMEFRAME   | RESPONSIBILE                                    |
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| D     | NOTIFICATIONS RELATING TO DAAB COMPLIANCE<br>REVIEW OF CONTRACTOR COMPLIANCE WITH SEA/SH<br>PREVENTION AND RESPONSE OBLIGATIONS<br>Notify the Association of any referral submitted to the Dispute Avoidance<br>and Adjudication Board (DAAB) to initiate a process of compliance<br>review in relation to a contractor's obligations to prevent and respond to<br>Sexual Exploitation and Abuse (SEA), and/or Sexual Harassment (SH)<br>specified in the respective works contract with such contractor; and, in the<br>event of any such referral, notify the Association of: (i) the DAAB's<br>decision on such referral; (ii) the contractor's Notice of Dissatisfaction, if<br>any, with such DAAB decision; (iii) any notification received on the | TIMEFRAME<br>No later than 7 days after the issuance or<br>receipt, as applicable, of the relevant<br>document (i.e., referral to the DAAB,<br>issuance of DAAB decision, Notice of<br>Dissatisfaction, notice of commencement of<br>emergency/full arbitration, emergency/full<br>arbitration order, as applicable). | RESPONSIBILE<br>ENTITY/AUTHORITY<br>PIU at MInT |
| 1.1   | commencement of an emergency arbitration proceeding or full arbitration<br>proceeding in relation to the DAAB's decision; and (iv) the resulting<br>emergency arbitration order and/or full arbitration order, if any.<br><b>ORGANIZATIONAL STRUCTURE</b><br>Establish and maintain a Project Implementation Unit (PIU) at the MInT<br>with qualified staff and resources to support management of ESHS risks<br>and impacts of the Project including one full-time Environmental Risk<br>Management Specialist (with OHS experience), one full-time Social<br>Specialist and one full time GBV specialist with expertise of gender as<br>well.  | Establish and maintain a PIU with qualified<br>staff as set out in the Financing Agreement no<br>later two months after the effective date, and<br>thereafter maintain these positions<br>throughout Project implementation   | PIU at MInT                                     |

| MATERIAL MEASURES AND ACTIONS   | TIMEFRAME   | RESPONSIBILE<br>ENTITY/AUTHORITY  |
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| <ul> <li>1.2 ENVIRONMENTAL AND SOCIAL INSTRUMENTS <ol> <li>Prepare, consult upon, disclose, adopt and implement an (a)Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs, including, as annexes, the Labor Management Procedures (LMP), GBV/SEA/SH Prevention and Response Action Plan, Social Assessment (SA), E-Waste Management Plan, and capacity assessment and action plan; (b) Resettlement Framework (RF); and (c) Security Risk Assessment and Management Plan (SRAMP).</li> <li>Prepare, consult upon, disclose, adopt and implement site specific Environmental and Social Impact Assessments (ESIAs), and/or corresponding Environmental and Social Management Plans (ESMPs) for subprojects including construction and installation/deployment of cross-border and national backbone network connectivity, last mile network expansion, access roads to other types of infrastructure along previously undeveloped land and data infrastructure, etc. as set out in the ESMF. In line with the ESMF and site specific ESIAs/ESMPs, ensure that contractors will prepare C-ESMPs before commencement of any construction activities. The activities described in the exclusion list shall be ineligible to receive financing under the Project.</li> </ol></li></ul> | <ol> <li>Prepare and disclose the ESMF, the RF<br/>and the SRAMP before Appraisal, and<br/>thereafter implemented throughout Project<br/>implementation.</li> <li>Adopt the site-specific ESIA/ESMP<br/>before launching the bidding process for the<br/>respective Project activity/subproject that<br/>requires the adoption of such as<br/>ESIA/ESMP. Once adopted, implement the<br/>respective instruments throughout Project<br/>implementation.</li> </ol> | PIU at MInT   |
| 1.3 MANAGEMENT OF CONTRACTORS<br>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, as listed under 1.2 (ESIA, ESMP, RAP, LMP) 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.   | As part of the preparation of procurement<br>documents for respective contracts.<br>Supervise contractors ESHS requirements<br>throughout Project implementation.   | MInT/PIU, other<br>implementing and partner<br>MDAs and Regional<br>MInT /EPA |

| MATER | IAL MEASURES AND ACTIONS  | TIMEFRAME   | RESPONSIBILE     |
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| 1.4   | <b>TECHNICAL ASSISTANCE</b><br>Ensure that the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.   | Throughout project Implementation   | PIU at MInT      |
| 1.5   | <b>CONTINGENT EMERGENCY RESPONSE (CERC) FINANCING</b><br>Ensure that activities and other technical assistance activities under the<br>CERC are carried out in accordance with terms of reference acceptable to<br>the Association, that are consistent with the ESSs.  | Prior to implementation of activities under<br>CERC   | PIU at MInT      |
|       | ESS 2: LABOR AND WORKING CONDITIONS   |   |                  |
| 2.1   | <b>LABOR MANAGEMENT PROCEDURES</b><br>Adopt and implement the Labor Management Procedures (LMP) for the<br>Project, including, inter alia, provisions on working conditions,<br>management of workers relationships, occupational health, and safety<br>(OHS) plan (including personal protective equipment, and emergency<br>preparedness and response), code of conduct (including relating to SEA<br>and SH), forced labor, child labor, grievance arrangements for Project<br>workers, and applicable requirements for contractors, subcontractors, and<br>supervising firms. | Prepare and disclose the LMP, as part of the ESMF, before Appraisal and thereafter implement the LMP throughout Project implementation.   | PIU at MInT      |
| 2.2   | GRIEVANCE MECHANISM FOR PROJECT WORKERS<br>Establish and operate a grievance redress mechanism for Project workers,<br>as described in the LMP and consistent with ESS10.<br>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION  | Establish a grievance mechanism (supported<br>by digital complaint management system)<br>for Project workers as part of the LMP, prior<br>to engaging Project workers and thereafter<br>maintain and operate throughout Project<br>implementation | PIU at MInT      |
|       | AND MANAGEMENT  |   |                  |
| 3.1   | WASTE MANAGEMENT PLAN<br>Adopt and implement a comprehensive waste management plan to manage<br>non-hazardous hazardous and e-wastes, consistent with ESS3.   | Same timeframe as under Section 1.2 (1) above   | PIU at MInT      |

| MATER | RIAL MEASURES AND ACTIONS   | TIMEFRAME  | RESPONSIBILE            |
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| 3.2   | <b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION</b><br><b>AND MANAGEMENT</b><br>Consistent with ESS10, incorporate resource efficiency and pollution<br>prevention and management measures in the ESMF and will be detailed in<br>site specific ESIAs/ESMPs for subprojects to be prepared under sections<br>1.2 (1) and 1.2 (2), respectively.   | Same timeframe as for the adoption and<br>implementation of the ESMF under Section<br>1.2 (1) above. Inclusion in site-specific<br>ESIAs/ESMPs is same timeline for adoption<br>and implementation as ESIA/ESMPs under<br>Section 1.2 (2) above. | PIU at MInT             |
|       | ESS 4: COMMUNITY HEAI   | LTH AND SAFETY   |                         |
| 4.1   | <b>TRAFFIC AND ROAD SAFETY</b><br>Incorporate measures to manage traffic and road safety risks as required<br>in the site-specific ESIAs/ESMPs to be prepared under section 1.2(2)  | Same timeframe as for the adoption and<br>implementation of the ESIAs/ESMPs under<br>Section 1.2 (2) above   | PIU at MInT             |
| 4.2   | <b>COMMUNITY HEALTH AND SAFETY</b><br>Assess and manage specific risks and impacts to the community arising<br>from Project activities, including, inter alia, e-waste, SEA/SH, child labor,<br>behavior of Project workers, risks of labor influx and other issues, and<br>include mitigation measures in the ESIAs/ESMPs to be prepared in<br>accordance with the ESMF.   | Same timeframe as for the adoption and<br>implementation of the ESIAs/ESMPs under<br>Section 1.2 (2) above   | PIU at MInT             |
| 4.3   | SEA AND SH RISKS<br>Adopt and implement a SEA/SH Action Plan as part of the ESMF to assess<br>and manage the risks of SEA and SH  | Same time frame as for the adoption and implementation of the ESMF under Section $1.2(1)$ above  | PIU at MInT             |
| 4.4   | <b>SECURITY MANAGEMENT</b><br>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 Security Risk Assessment and Management Plan (SRAMP) for the Project, guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel. | Same timeframe as under Section 1.2 (1) above  | PIU at MInT             |
|       | ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAN  | D USE AND INVOLUNTARY RESETTLEM  | IENT                    |
| 5.1   | <b>RESETTLEMENT FRAMEWORK (RF)</b><br>Adopt and implement a Resettlement Framework (RF) for the Project, consistent with ESS5.  | Same timeframe as under Section 1.2 (1) above  | PIU at MInT             |

| MATERIAL MEASURES AND ACTIONS  | TIMEFRAME   | RESPONSIBILE<br>ENTITY/AUTHORITY |
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| 5.2 <b>RESETTLEMENT PLANS</b><br>Adopt and implement a resettlement action plan (RAP) for each<br>subproject activities under the project for which the RF requires such<br>RAP as set out in the RF and consistent with ESS5.   | Before the commencement of the subprojects<br>that involve land acquisition and/or physical<br>and economic displacement of persons adopt<br>and implement the respective RAP, including<br>ensuring that before taking possession of the<br>land and related assets, full compensation has<br>been provided and displaced people have<br>been resettled and moving allowances have<br>been provided. | PIU at MInT                      |
| ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE   | MANAGEMENT OF LIVING NATURAL R  | ESOURCES                         |
| 6.1 <b>BIODIVERSITY RISKS AND IMPACTS</b><br>Where relevant, adopt and implement mitigation measures, including exclusion list for high-risk subprojects (including interventions in critical habitats), E&S screening process, analysis of alternatives, and biodiversity management plans (BMPs) in particular to risks associated with critical habitats specifically when high impacts are foreseen, as part of subproject specific ESIAs/ESMPs, consistent with ESS6 and ESMF | Same timeframe as under Section 1.2 (2) above   | PIU at MInT                      |
| ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICAL   | LLY UNDERSERVED TRADITIONAL LO  | CAL COMMUNITIES                  |
| <ul> <li>7.1 INDIGENOUS PEOPLES PLANNING FRAMEWORK         Communities in Afar, Somali, Gambella, Benishangul and pastoralists found in Oromia and SNNPR Regional States are considered as underserved communities and fulfill the criteria of ESS7.     </li> <li>Social assessment (SA) has been prepared as part of the ESMF and shall be adopted and implemented in consistent with ESS7.</li> </ul>   | Prepare and disclose the SA as part of the ESMF prior to Appraisal and thereafter implement throughout the project.   | PIU at MInT                      |
| 7.2 <b>GRIEVANCE MECHANISM</b><br>Ensure that the Grievance Redress Mechanism established and/or<br>strengthened under ESS10 as part of the SEP shall be accessible and is<br>culturally appropriate for the underserved communities.  | Throughout the project implementation.  | PIU at MInT                      |
| ESS 8: CULTURAL H  | HERITAGE.   | L                                |

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| 8.1   | CULTURAL HERITAGE RISKS AND IMPACTS<br>Where relevant, adopt and implement mitigation measures, including<br>exclusion list for high-risk subprojects, E&S screening process, analysis<br>of alternatives, and cultural heritage management plans, as part of<br>subproject specific ESIAs/ESMPs, consistent with ESS8 and ESMF.  | Same timeframe as under Section 1.2 (2) above  | PIU at MInT                      |
| 8.2   | CHANCE FINDS<br>Describe and implement the chance finds procedures, as part of subproject<br>specific ESIAs/ESMPs consistent with ESS8 and ESMF.  | Same timeframe as under Section 1.2 (2) above  | PIU at MInT                      |
|       | ESS10: STAKEHOLDER ENGAGEMENT A   | ND INFORMATION DISCLOSURE  |                                  |
| 10.1  | <b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND</b><br><b>IMPLEMENTATION</b><br>Adopt and implement a Stakeholder Engagement Plan (SEP) for the<br>Project, consistent with ESS10, which shall include measures to, inter alia,<br>provide stakeholders with timely, relevant, understandable, and accessible<br>information, and consult with them in a culturally appropriate manner,<br>which is free of manipulation, interference, coercion, discrimination, and<br>intimidation.   | Adopt the SEP prior to Appraisal and<br>thereafter implement the SEP throughout<br>Project implementation.                     | PIU at the MInT                  |
| 10.2  | <ul> <li>PROJECT GRIEVANCE MECHANISM</li> <li>Establish, publicize, maintain, and operate an accessible grievance mechanism (GRM), 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.</li> <li>The GRM 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.</li> </ul> | GRM established no later than 60 days after<br>the project effectiveness date, maintained<br>throughout Project implementation | PIU at the MInT                  |

| MATERIAL MEASURES AND ACTIONS  | TIMEFRAME  | RESPONSIBILE<br>ENTITY/AUTHORITY |  |
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| CAPACITY SUPPORT   | CAPACITY SUPPORT (TRAINING)                                    |                                  |  |
| <ul> <li>CS1 Provide training to the PIU staff, E &amp; S focal persons at implementing partners, and government officials on: <ul> <li>Stakeholder mapping and engagement</li> <li>ESMF implementation, including E&amp;S screening, preparation, implementation, and monitoring of ESIAs/ESMPs</li> <li>Project implementation supervision, monitoring, evaluation, and E &amp; S reporting,</li> <li>RAP, RF, LMP and E-WMP,</li> <li>Requirements of WBG EHS Guidelines for Telecommunications and General EHS Guidelines, and</li> <li>Grievance Redress Mechanisms.</li> </ul> </li> <li>Awareness creation for government officials, project steering committee (PSC), and project technical committee on: <ul> <li>Project objectives and components</li> <li>ESMF implementation</li> <li>Grievance Redress Mechanisms</li> </ul> </li> <li>Sensitization for project affected community on: <ul> <li>Project objectives and benefits,</li> <li>Community Health and Safety (OHS) issues associated with the Project and subproject activities, including environmental concerns and waste management, and</li> <li>Grievance Redress Mechanism in place</li> </ul> </li> </ul> | Throughout the Project implementation as specified in the ESMF | PIU at MInT                      |  |

| MATERIAL MEASURES AND ACTIONS  | TIMEFRAME                        | RESPONSIBILE<br>ENTITY/AUTHORITY |
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| <ul> <li>CS2 Organize and provide training on project related OHS issues and measures to all project workers including PIU staff, E &amp; S foca and workers with the contractors and supervision contractors:</li> <li>Management of hazardous and non-hazardous wastes</li> <li>Relevance ad use PPE in the different working condition</li> <li>Managing OHS risks and impacts associated with w confined/excavated sites, lifting operation,</li> <li>traffic and road safety accidents</li> <li>Emergency preparedness and response</li> <li>SEA/SH awareness</li> <li>Code of Conduct</li> <li>Grievance Redress Mechanism for any complaints coordinates</li> </ul> | al persons specified in the ESMF | PIU at MInT                      |