

REPUBLIC OF SUDAN

**Ministry of Finance and Economic Planning (MoFEP)
SUDAN FAMILY SUPPORT PROGRAM (SFSP)**

Additional Financing

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

December 2020

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ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Sudan (hereinafter the **Recipient**) shall implement the Sudan Family Support Project – Additional Financing (P176154) (**the Project**), with the involvement of the following Ministries/agencies/units: Ministry of Finance and Economic Planning/ the Digital Transformation Agency, Ministry of Interior/National Civil Registry Agency (MoI/NCRA), Ministry of Labor and Social Development (MoLSD), and Ministry of Education (MoE). In areas where Government service provision may face challenges in digital or non-digital payment delivery, or where additional system-building support is needed, World Food Program (**WFP**) support will be engaged. WFP has considerable experience implementing cash-based transfers in Sudan. The International Development Association (the **Association**) is acting as administrator of the Sudan Transition and Recovery Support Multi-Donor Trust Fund (MDTF) that is financing the Project.
2. The Recipient 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, specific documents or plans, Institutional arrangements and capacity requirements, as well as the timing for each of these.
3. The Recipient shall also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as the Social Assessment, any Social Management Plan (SMP) and the Stakeholder Engagement Plan (SEP), and the timelines specified in those documents.
4. The Recipient is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministries referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by the Recipient as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and the Recipient, 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 through its delegated representatives shall agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the Recipient. The Recipient shall promptly disclose the updated ESCP.
7. 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, health, and safety impacts, and gender-based violence.

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	REGULAR REPORTING: Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to, stakeholder engagement activities and grievances log.	Quarterly throughout the Project implementation period	Ministry of Finance and Economic Planning
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE: The Project Implementation Unit will be composed of qualified staff and resources to support management of ESHS risks and impacts of the Project. In addition to the Program Manager and technical specialists, the PIU shall include an experienced Social Specialist, with more than eight (8) years of experience in social risk management, to be full time dedicated to the Project, communication Specialists and stakeholder coordinators. The Communication Specialists/Stakeholder Coordinators shall be allocated to each state the program is working in.</p> <p>Mobilize additional staff as needed on short-term or long-term assignment, to support the project in managing risks related with Gender-based Violence (GBV)/ Sexual Exploitation and Abuse (SEA), labor conditions (health & safety), community health and safety, and social inclusion.</p> <p>The project will recruit female community liaison volunteers within each state, who will receive a stipend to serve as link between the project and wider community, promote the project locally, and be provide insights on impact and emerging risks.</p>	Shall be maintained throughout the project implementation period.	Ministry of Finance and Economic Planning
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS</p> <p>i. Update, consult on, disclose, adopt, and implement a Social Assessment which will include:</p> <ul style="list-style-type: none"> - risks and impacts of the project throughout the country - a specific section for remote areas/areas where SSAHUTLC are present - a social management plan, including provisions to ensure that individuals or groups who, because of their circumstances, may be disadvantaged or vulnerable, have access to the development benefits resulting from the Project 	<p>i. The SA, and Social management plan shall be updated in line with the requirement of the parent project.</p>	Ministry of Finance and Economic Planning

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<ul style="list-style-type: none"> - an organizational structure to implement provisions outlined throughout the document - an overview on budget and other resources necessary to implement noted provisions <p>ii. Implement the GBV mitigation plan as annexed to the SA,</p> <p>iii. Prepare an assessment on data protection and privacy rights and a security management plan</p> <p>iv. Implement the Labor Management Procedures established for the parent project</p> <p>v. Update, consult on, disclose, adopt, and implement a Stakeholder Engagement Plan (SEP), including GRM, in a manner acceptable to the Association</p> <p>vi. Assess any unforeseen impacts, notified via the Grievance Redress Mechanism (GRM), and implement respective corrective measures where appropriate.</p>	<p>ii. Throughout Project Implementation.</p> <p>iii. Finalize data protection plan in line with the requirement of the parent project; Security Management Plan to be prepared before any physical engagement in high-risk security or conflict prone areas and prior to eventually hiring a security firm.</p> <p>iv. Throughout Project Implementation.</p> <p>v. Update to be prepared in line with the requirement of the parent project.</p> <p>vi. Throughout Project Implementation.</p>	
1.3	<p>EXCLUSIONS: Exclude the following type of activities as ineligible for financing under the Project:</p> <ul style="list-style-type: none"> • Activities that may cause long term, permanent and/or irreversible (e.g. loss of major natural habitat) adverse impacts • Activities that have high probability of causing serious adverse effects to human health and/or the environment • Activities that may have adverse social impacts and may give rise to significant social conflict • Activities that may affect lands or rights of indigenous people or other vulnerable minorities, • Activities that may involve permanent resettlement or land acquisition, adverse impacts on cultural heritage 	<p>Activities to be excluded will be identified during the assessment process conducted under action 1.2.i. above and remain excluded throughout Project implementation.</p>	<p>Ministry of Finance and Economic Planning</p>

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ESS 2: LABOR AND WORKING CONDITIONS			
2.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above.	Throughout Project implementation.	Ministry of Finance and Economic Planning
2.2	LABOR MANAGEMENT: The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Association, including through, inter alia, implementing adequate occupational health and safety measures (including 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 (if any).	Throughout Project implementation.	Ministry of Finance and Economic Planning
2.3	Implement Labor Management Procedures (LMP) which are assessing risks, regulations, and risk management measures for the different types of workers relevant for the different project components and spelling out the way in which project workers will be managed, in accordance with the requirements of national law and ESS2.	Throughout Project implementation.	Ministry of Finance and Economic Planning
2.4	GRIEVANCE MECHANISM FOR PROJECT WORKERS: Maintain a grievance redress mechanism (GRM) for project workers, including contracted workers as part of the LMP.	GRM operational throughout project implementation	Ministry of Finance and Economic Planning
2.5	PROJECT WORKERS TRAINING: Implement training of project workers designed to heighten awareness of risks and to mitigate impacts on local communities, as defined in SA, LMP and GBV action plan.	Workers to be trained within [1] month of hire. Training procedures to be maintained throughout Project implementation	Ministry of Finance and Economic Planning
2.6	SECURITY OF PROJECT WORKERS AND PROJECT-AFFECTED PARTIES: Prevention measures and emergency responses for different categories of project workers and project-affected parties will be developed in a Security Management Plan (SMP) developed in consultation with the Association and implemented in a manner acceptable to the Association.	Security Management Plan to be prepared before any physical engagement in high- risk security or conflict prone areas and prior to hiring security team. Maintained throughout Project implementation	Ministry of Finance and Economic Planning
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	This standard is not relevant		
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	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 COVID19 during comm; ensure that individuals or groups who, because of their particular	Throughout Project implementation.	Ministry of Finance and Economic Planning

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	circumstances, may be disadvantaged or vulnerable have access to the development benefits resulting from the Project; prevent and respond to sexual exploitation and abuse, and sexual harassment.		
4.2	GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION: Ensure that GBV procedures are in place, including training and monitoring during project implementation as outlined in the GBV/SEA Mitigation Plan as prepared under the parent project.	Maintained throughout Project Implementation	Ministry of Finance and Economic Planning
4.3	CONTEXTUAL SECURITY RISK The security risk assessment, incorporated in the SA under 1.2.1, will outline (i) the overall security risk for communities participating in the project and (ii) procedures for local risk assessments as well as (iii) respective security strengthening measures.	Security Management plan will be prepared before any physical engagement in high-risk security or conflict prone areas and prior to the hiring of security firms. Maintained throughout Project implementation	Ministry of Finance and Economic Planning
4.4	DATA PROTECTION The data protection assessment, will outline (i) the overall risk related to data gathering and usage under this project and (ii) protocols to ensure that collected data under this project is consistent with international best practices, including that the data is solely used for the purpose of this project and no harm results from it.	Data protection plan finalized by December 2020; Maintained throughout Project implementation	Ministry of Finance and Economic Planning
4.5	TRAINING FOR THE COMMUNITY: Outlined in SEP and Social Management Plan (SMP) <ul style="list-style-type: none"> • Recipient shall conduct or require implementing partners to conduct trainings for the community designed to heighten awareness of environmental and social risks and impacts and mitigation measures including trainings on): • GBV/SEA awareness and prevention • Community grievance redress mechanism as described in the SEP • Data privacy and Security as described in data protection Plan and Security management plan 	Training will be provided before the program disburses funds to new communities, which will be sequentially targeted throughout project implementation	Ministry of Finance and Economic Planning
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	This standard is not relevant, as no land acquisition, restriction on land use, or involuntary resettlement is anticipated as it is only a cash transfer program.		

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ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	The project will not involve any on-the-ground activities which might have impacts on biodiversity and natural resources. It only provides cash transfer to eligible beneficiaries. Therefore, this standard is not Relevant		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above.	Throughout Project implementation.	Ministry of Finance and Economic Planning
7.2	A more comprehensive SA for areas where SSAHUTLC are present will be developed.	In line with the requirement of the parent project.	Ministry of Finance and Economic Planning
7.3	The project will be implemented in part in areas where SSAHUTLC are present. The Recipient shall ensure that these communities are appropriately informed and can share from the project benefits in an inclusive and culturally appropriate manner with provisions included in the Social Assessment.	Throughout project implementation	Ministry of Finance and Economic Planning
7.4	The project will implement provisions to ensure that project activities, including registration of beneficiaries, will not lead to discrimination or exclusion of SSAHUTLC in line with the data privacy assessment.	Throughout project implementation	Ministry of Finance and Economic planning
ESS 8: CULTURAL HERITAGE			
	This standard is not relevant		
ESS 9: FINANCIAL INTERMEDIARIES			
	This standard is not relevant, as the project has no financial intermediaries.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN: Prepare, update, disclose and adopt a Stakeholder Engagement Plan (SEP) consistent with ESS10, in a manner acceptable to the Association.	Updated SEP to be prepared after community consultations in the new states and one month from effectiveness of the AF. To be updated regularly throughout Project implementation	Ministry of Finance and Economic Planning

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
10.2	<p>STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE: Implement the Stakeholder Engagement Plan (SEP) consistent with ESS10, including the use of different, culturally appropriate communication approaches to ensure communication also with the most vulnerable, including people living in the remote areas and people with disabilities.</p>	Throughout Project implementation.	Ministry of Finance and Economic Planning
10.3	<p>GRIEVANCE MECHANISM: Accessible grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Association.</p>	Throughout Project implementation.	Ministry of Finance and Economic Planning
<p>• CAPACITY SUPPORT (TRAINING)</p>			
	<p>All capacity building activities and trainings will be further detailed in the Social Assessment and GBV risk assessment, trainings may focus, for example, on:</p> <ul style="list-style-type: none"> • Stakeholder engagement • Gender-Based Violence Risk Mitigation • Grievance Management • Implementation, Monitoring and reporting of SMPs • Labor management procedures • Security Management • Gender based violence and sexual exploitation 	Throughout Project implementation.	Ministry of Finance and Economic Planning