## Republic of South Sudan Building Skills for Human Capital Development Project (P178654)

## Draft ENVIRONMENTAL AND SOCIAL

**COMMITMENT PLAN (ESCP)** 

March 2, 2023

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

- The Republic of South Sudan (the Recipient) will implement the Building Skills for Human Capital Development Project (the Project), with the involvement of the Ministry of General Education and Instruction, Ministry of Higher Education, Science and Technology and Ministry of Finance and Planning, as set out in the Financing Agreement and Grant Agreement. The International Development Association acting as administrator (the Association), has agreed to provide financing for the Project, as set out in the referred agreements.
- 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 a part of the Financing Agreement and 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 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 Republic of South Sudan, through the Ministry General Education and Instruction and Ministry of Higher Education, Science and Technology and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Republic of South Sudan of representatives of Ministry General Education & Instruction, Science and Technology. The Recipient shall promptly disclose the updated ESCP.

MATER	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
MONIT	ORING AND REPORTING		
A	<b>REGULAR REPORTING</b> 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 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).	Submit quarterly and annual progress reports to the Association throughout Project implementation, commencing after the Project Effective Date. Submit each quarterly reports to the Association no later than 14 days after the end of each reporting period and for the annual report one month before the subsequent year.	Ministry of General Education and Instruction (MoGEI) and Ministry of Higher Education, Science and Technology (MoHEST)
В	<ul> <li>INCIDENTS AND ACCIDENTS</li> <li>Promptly notify the Association 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.</li> <li>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.</li> <li>Subsequently, at the Association's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</li> </ul>	Notify the Association no later 48 hours after learning of the incident or accident SEA/SH cases shall be reported within 24 hours to the Association. Incident report shall be provided to the Association in accordance with the procedures outlined in the SEA/SH Prevention and Response Action Plan. Provide subsequent report to the Association within fifteen (15) days of the incident or accident notification, unless a different timeline is specified by the Recipient and acceptable to the Association	MoGEI and MoHEST PIUs
С	<b>CONTRACTORS' MONTHLY REPORTS</b> Require contractors (who shall undertake civil works and TA related activities) to provide monthly monitoring reports on ESHS performance, as may be applicable, in accordance with the metrics specified in the respective bidding documents and contracts, and submit such reports to the Association.	Contractor to submit monthly report to both PIUs and the PIU ministries to report back to the Association quarterly throughout Project implementation	Contractor , PIUs
D			
ESS 1:	ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AN	ID IMPACTS	
1.1	ORGANIZATIONAL STRUCTURE		

ATEF	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	MoGEI and MoHEST shall establish and maintain PIUs for each ministry with qualified staff and resources to support management of E&S risks and each PIUs shall hire and maintain qualified staff and resources to support management of E&S risks including appointing 1 Environmental Specialist,1 GBV specialist and 1 Social Specialist – fully dedicated to the Project at each PIU.	Establish and maintain PIUs as set out in the Financing Agreement and Grant Agreement. Hire the experts for each PIU prior to the Project Effective Date and thereafter maintain these positions throughout Project implementation	MoGEI and MoHEST PIUs
1.2	<ul> <li>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</li> <li>I. MoGEI and MoHEST in coordination shall consult, prepare, disclose, adopt and implement an Environmental and Social Management Framework (ESMF) and include, screening process and exclusion criteria for the potential project activities; Environment, Social, Health, and Safety clauses and requirements which will be incorporated in the contract bid documents, institutional arrangements for environmental and social due diligence and monitoring; any needed capacity-building measures including an environmental and social risk management implementation and generic guidance on the preparation of site-specific management plans.</li> </ul>	<ol> <li>ESMF shall be consulted, prepared, adopted, and disclosed before disbursement of non-TA activities of the project</li> <li>II. A Labor Management Procedures (LMP) shall be prepared, adopted</li> </ol>	MoGEI and MoHEST PIUs
	<ul> <li>II. Similarly, the ministries in coordination shall prepare and adopt a Labor Management Procedure (LMP).</li> <li>III. A, Social Assessment (SA) and SEA/SH risks assessment shall be prepared as part of the ESMF.</li> </ul>	<ul> <li>III. Social Assessment, and GBV/SEA/SH will be prepared and adopted as part</li> </ul>	
	IV. MoGEI and MoHEST shall conduct a security risk assessment (SRA) and prepare and adopt a Security Management Plan (SMP) which outlines the Project's approach to addressing the pertinent security risks in the project sites. The SRAMP shall be reviewed by the Bank; and adopted and	of an ESMF and will be implemented throughout the project implementation.	
	<ul> <li>implemented by ministries accordingly.</li> <li>V. Following the ESMF, the PIUs shall also require undertaking site-specific environmental and social assessments i.e., environmental and social impact assessments (ESIAs) and Environmental and Social management plans (ESMPs) for subprojects including assessment of the physical environment, location of schools, availability of suitable land free of encumbrances and</li> </ul>	IV. The SRAMP shall be prepared and shared for the Bank for review before the project effectiveness and will be revised, adopted and disclosed one month after effectiveness.	
		V. Adopt the ESIA/ESMP before	

MATER	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	<ul> <li>contestation, ensuring equity and inclusivity of site selections - as well as capacity of likely contractors to implement ESMPs and monitoring arrangements. Also account for short-, medium- and long-term impacts of each of the interventions to make sure that subsequent mitigation measures are employed</li> <li>VI. EXCLUSIONS</li> <li>Exclude the following type of activities as ineligible for financing under the Project: <ul> <li>Activities that may cause long term, permanent and/or irreversible (e.g. loss of major natural habitat) impacts</li> <li>Activities that have high probability of causing serious Health and safety adverse effects to human health and/or the environment other</li> <li>Activities that may affect lands or rights of indigenous people or other vulnerable minorities,</li> <li>Activities that may involve permanent resettlement or land acquisition</li> <li>Activities that may have risk/impact on cultural heritage and all the other excluded activities set out in the ESMF of the</li> </ul> </li> </ul>	<ul> <li>launching the bidding process for the respective subprojects prior to the carrying out of subproject that requires the adoption of such ESIA/ESMP. Once adopted, implement the respective ESIA/ESMP throughout Project implementation.</li> <li>VI. As part of E&amp;S screening and implement it during intial ESA.</li> </ul>	
1.3	<ul> <li>Project.</li> <li>MANAGEMENT OF CONTRACTORS</li> <li>Incorporate the relevant aspects of the ESCP, including the relevant E&amp;S documents and/or plans, ESMF, the Labor Management Procedures, code of conduct, and Security Management Plan, into the ESHS specifications of the procurement documents 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.</li> <li>Develop and implement procedures for managing contractors and subcontractors recruited to carry out civil works including:         <ul> <li>Ensure compliance with the national laws, e.g., licenses to operate and excavate any sites for project purposes.</li> </ul> </li> </ul>	As part of the preparation of procurement documents and respective contracts. Codes of conduct and relevant aspects of the ESMF shall be adopted prior to undertaking any rehabilitation/renovation works by the contractor/that is costed, with sufficient budget to mitigate E&S risks; Supervise contractors throughout Project implementation.	MoGEI and MoHEST PIUs and contractor focal point/supervising firm

MATER	A MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	<ul> <li>Relevant environmental and social requirements shall be included in the procurement and contracting process including bidding documents, contracts and subcontracts consistent with the requirements of ESSs;</li> <li>The contractors shall adopt the relevant aspects of the ESMF and implement the E&amp;S requirements specified in the bid document and must show that they have sufficient staff and capacity to carry it out;</li> <li>Codes of conduct (CoCs) are required for contractors, subcontractors, and their workers covering conditions of service, OHS, GBV and security requirements.</li> <li>Preparation of a detailed contractor-ESMP (C-ESMP) that is costed, with sufficient budget to mitigate E&amp;S risks;</li> <li>Monitor contractor commitment and compliance with as per the Project specific ES instruments and requirements.</li> <li>Provide GRM for contractor and subcontractor, primary suppliers, communities and other stakeholders as well as employees.</li> <li>Ensure contractors and primary suppliers provide details on their oversight on environmental, social, health and safety (ESHS) performance and adequate mechanisms for serious incident reporting should it be required; and</li> <li>Monitor the performance of the contractors and primary suppliers to ensure that they comply with the ESHS specifications of their respective contracts in accordance with the ESMF, LMP, GBV Action Plan, and Security Management Plan</li> </ul>		
1.4	<b>TECHNICAL ASSISTANCE</b> Ensure that the consultancies, studies including feasibility studies, capacity building, training, and any other technical assistance activities under the Project is 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.	MoGEI and MoHESTPIUs
1.5	CONTINGENT EMERGENCY RESPONSE (CERC) FINANCING a) Ensure that the CERC Manual as specified the legal agreement includes a description of the ESHS assessment and management arrangements including, if applicable, ESMF Addendum that shall be included or referred	a) The adoption of the CERC Manual and, if applicable, other instruments, as per the Project Operational Manual (POM), in form and substance acceptable to the Association is a withdrawal condition under Section III of	MoGEI and MoHEST PIUs and Any designated authority for a CERC

MATE	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	<ul> <li>to in the CERC Manual for the implementation of the CERC component, in accordance with the ESSs.</li> <li>b) Adopt any environmental and social (E&amp;S) instruments which may be required for activities under CERC component of the Project, in accordance with the CERC Manual and, if applicable, ESMF Addendum and the ESSs, and thereafter implement the measures and actions required under said E&amp;S instruments, within the timeframes specified in said E&amp;S instruments.</li> <li>The Project Operations Manual (POM) shall include an annex with the procedures for triggering and implementing the CERC and the environmental and social instruments required for the proper</li> </ul>	Schedule 2 of the Financing Agreement for the Project. b) Adopt any required E&S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation.	
FCC 2.	implementation of the CERC. LABOR AND WORKING CONDITIONS		
2.1	<ul> <li>LABOR MANAGEMENT PROCEDURES</li> <li>MoGEI and MoHEST in coordination shall prepare, adopt, and implement the Labor Management Procedures (LMP) for the Project, including, inter alia conditions of service; <ul> <li>code of conduct;</li> <li>occupational, health and safety (OHS) measures;</li> <li>Covid-19 prevention measures;</li> <li>prevention of child labor and forced labor;</li> <li>emergency preparedness and response;</li> <li>grievance redress mechanism for Project workers;</li> <li>training of Project workers on key issues including OHS and GBV prevention; and</li> </ul> </li> </ul>	Adopt the LMP prior to disbursement of non- TA activities of the Project and thereafter implement the LMP throughout Project implementation.	MoGEI and MoHEST PIUs
2.2	<b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b> Establish, operate, and maintain a GRM for direct Project workers and contracted workers as part of the LMP as well as a separate confidential mechanism for GBV/SEAH complaints as described in the LMP and consistent with ESS2.	Establish and operate the Grievance Redress mechanism prior to engaging Project workers, and thereafter maintain and operate it throughout Project implementation.	MoGEI and MoHEST PIUs

MATER	IAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
3.1	WASTE MANAGEMENT PLAN MoGEI and MoHEST in coordination shall identify health hazards of solid wastes handling, storage, and disposal mechanisms and incorporate, adopt and implement a Waste Management Plan (WMP) within the ESMF (under the clause 1.2 above) consistent with ESS3. Furthermore, the site-specific instruments (ESIA/ESMP) will provide specific measures for the project impact related to resource efficiency, waste management in line with the Environmental, Health, and Safety Guidelines of the World Bank and the ESMF as per the requirements of ESS3.	Same timeframe for the adoption of the ESMF and ESMPs under 1.2 and thereafter implement the throughout Project implementation"	MoGEI and MoHEST PIUs
3.2	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> Incorporate resource efficiency and pollution prevention and management measures in the ESMF and ESMPs to be prepared under action 1.2 above.	Same timeframe for the adoption of the ESMF and ESMPs under 1.2 and thereafter implement the throughout Project implementation"	MoGEI and MoHEST PIUs
ESS 4:	COMMUNITY HEALTH AND SAFETY		
4.1	<b>TRAFFIC AND ROAD SAFETY</b> Incorporate measures to manage traffic and road safety risks as required in the ESMF and ESMPs to be prepared under action 1.2 above.	Same timeframe as for the adoption and implementation of the ESMF and ESMPs under 1.2.	MoGEI and MoHEST PIUs
4.2	<b>COMMUNITY HEALTH AND SAFETY</b> <i>MoGEI and MoHEST</i> PIUs shall adopt and implement measures and actions to assess and manage specific risks and impacts to the community arising from Project activities, including risks of labor influx; risk of exposure to infectious diseases (including COVID-19 and STDs; risk of contamination of community water sources, soils due to the rehabilitation and civil works, health and safety risks due to lack of precautions and PPEs; risks related to gender, GBV, and SEA/SH; response to emergency situations due to conflict or natural disasters, construction and structural safety risks, and include these measures and actions in the ESMF to be prepared in a manner acceptable to the Association. Ensure that the TTIs and schools to be refurbished/rehabilitated under this Project are designed and modelled on the Safe School Standards, with provision of adequate access to potable water and sanitation in schools for children and their teachers, ensure that indoor air quality (IAQ) is in compliance with World Health Organization guidelines	Incorporate measures related with community health and safety as part of the ESMF and ESMPs under 1.2 and implement and monitor implementation it throughout the Project implementation.	MoGEI and MoHEST PIUs

MATE	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<b>MATEF</b> 4.3	<ul> <li>SEA AND SH RISKS MoGEI and MoHEST incoordination shall conduct GBV risk assessment, and shall develop and adopt a GBV/SEA/SH Action Plan as part of the ESMF and subsequent site specific ESIA/ESMPs.</li> <li>Key measures shall include: <ul> <li>CoCs for Project and contracted workers; and plan for sensitization/awareness raising for the community and intended training activities for workers on CoC and GBV/SEA/SH provisions.</li> <li>Mapping and development of partnerships with identified GBV service providers;</li> <li>A Reporting and Response Framework that outlines key requirements for reporting cases if they arise and measures to enable safe, ethical, survivor-centered response;</li> <li>Establishment of special channel/procedures for safe, confidential and survivor centered reporting of GBV incidence that connect to the Project GRM and enable training of GRM operators on how to respond to cases that come forward.</li> </ul> </li> <li>Development of additional protection measures to address potential sexual harassment in recruitment practices and in the workplace.</li> <li>Clarification of GBV requirements in bidding documents including requirements for CoCs, training of workers, and how GBV related costs shall be covered in the contract.</li> </ul>	TIMEFRAME         adopt GBV risk assessment and GBV/SEA/SH         Action Plan as part of the ESMF         Same timeframe for the adoption of the         ESMF and ESMPs under 1.2 and thereafter         implement the throughout Project       implementation"	RESPONSIBLE ENTITY MoGEI and MoHEST PIUs
	be covered in the contract. Bid evaluations to include consideration for GBV response proposals. Identification of a Third-Party Monitoring to track implementation and management of GBV risks. Ensuring additional funds are made available to implement measures to address GBV/SEA risks and impacts that may arise during Project implementation.		

MATER	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
4.4	SECURITY MANAGEMENT MoGEI and MoHEST shall prepare, adopt, and implement across all Project activities involving security personnel a Security Risk Assessment and Management Plan (SRAMP) in consistent with ESS4 and acceptable to the Association. The SMP shall be designed to safeguard all Project workers and Project-affected parties from risk of violence and from risks related to hiring of security personnel. In addition, the preparation of site-specific instruments (ESIA/ESMP) will also adopt requirements of the Project SRAMP action plan. Pre-deployment Security Risk Assessments (SRAS) shall be conducted prior to commencement of Project activities and measures put in place to mitigate/respond to such risks	Prepare and adopt the draft Security Assessment and Management Plan (SRAMP) draft shall be available before the project effectiveness then, finalize it based on the feedback from the Bank within one month after effectiveness. The SMP shall be updated once the ESMF and other instruments (ESIA/ESMP) prepared implement the SRAMP throughout the Project implementing period.	MoGEI and MoHEST PIUs
FSS 5	LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTL	FMENT	
	A screening mechanism shall be adopted under the ESMF to confirm the status of any land use by the Project. All Project activities shall take place within the existing premises of institutions and there shall not be any new land acquisition for the Project. Further, beneficiary institutions must demonstrate that they have tenure or authorized use of land needed for their Project-sponsored activities and that these activities will not displace other land users.	Throughout Project implementation.	MoGEI and MoHEST PIUs
ESS 6:	BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING N	IATURAL RESOURCES	<b>)</b>
6.1	<b>BIODIVERSITY RISKS AND IMPACTS</b> Adopt and implement relevant aspects of this standard in the ESMF and address potential direct, indirect and cumulative impacts and provide mitigation hierarchy to define measures to protect and reduce impact on ecosystems (natural and critical habitats) and biodiversity, and support preventive and mitigation measures in consistent with ESS6. Prepare and include screening checklist and exclusion criteria within the ESMF and make sure that sub-project activities shall not alter or cause destruction to any critical or sensitive natural habitats.	same timeframe as for the adoption and implementation of the ESMF	MoGEI and MoHEST PIUs
ESS 7: I	NDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED 1	IRADITIONAL LOCAL COMMUNITIES	1
7.1	INDIGENOUS PEOPLES PLANNING FRAMEWORK The majority of the communities in South Sudan meet the criteria for Sub	Prepare, adopt and implement Social	MoGEI and MoHEST PIUs

MATER	IAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	Saharan Africa Historically Underserved Traditional Local Communities. As such, the Project through its design, SEP and ESMF shall provide adequate, culturally appropriate, and inclusive forms of meaningful consultations and linguistically relevant content on the Project identification and implementation process and benefit sharing.	Assessment same timeframe with ESMF and ESMPs under 1.2 and thereafter implement the throughout Project implementation"	
	Prepare, consult upon, disclose, a Social Assessment (SA) as per the requirement of ESS7 and the findings of the social assessment shall be included in the ESMF.		
ESS 8: 0	CULTURAL HERITAGE		
8.1	CULTURAL HERITAGE AND CHANCE FINDS: MoGEI and MoHEST shall ensure that ESS8 related measures are included in the ESMF and ESIAs/ESMPs and implemented in a manner acceptable to the Association. Prepare, adopt, and implement - if applicable - the chance finds procedure described in the ESMF and respective site specific ESRM instruments consistent with ESS8.	Same timeframe for the adoption of the ESMF and ESMPs under 1.2 and thereafter implement the throughout Project implementation"	MoGEI and MoHEST PIUs
ESS 9: F	INANCIAL INTERMEDIARIES		
9.1	This standard is not relevant.	NA	NA
ESS 10:	STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE		
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b> MoGEI and MoHEST incoordination shall 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.	The draft SEP has been developed and shall be disclosed before appraisal. The SEP shall be adopted and implemented throughout Project implementation	MoGEI and MoHEST PIUs
	The SEP shall be updated once the ESMF and other instruments prepared; an estimated budget for SEP implementation and the means and authority to access it need shall also be established. SEP shall be updated as needed during implementation		
10.2	<b>PROJECT GRIEVANCE MECHANISM</b> Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances	Establish the grievance mechanism not later than one month after Project Effective Date,	MoGEI and MoHEST PIUs

and thereafter maintain and operate the grievance mechanism throughout Project implementation. As part of sub component 4.3 capacity building activities shall be undertaken throughout the project implementation period.	MoGEI and MoHEST PIUs
building activities shall be undertaken throughout the project implementation	MoGEI and MoHEST PIUs
throughout the project implementation	

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
workers;		
Consultants doing TA activities		
Beneficiary communities; and		
Key stakeholders.		