



THE REPUBLIC OF MALAWI

PUBLIC PRIVATE PARTNERSHIP COMMISSION

DIGITAL MALAWI ACCELERATION PROJECT

(P505095)

under the Inclusive Digitalization in Eastern and Southern
Africa Multi-Phase Programmatic Approach Program

DRAFT
ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN

MARCH 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Malawi (the Recipient) will implement the Digital Malawi Acceleration Project (DMAP or the Project) , with the involvement of the Ministry of Information and Digitalization and the Public Private Partnership Commission, as set out in the Financing Agreement. The International Development Association (the Association), has agreed to provide financing (P505095) for the Project, as set 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 a 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 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 Recipient through the Public Private Partnership Commission and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient through the Chief Executive Officer of the Public Private Partnership Commission. 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 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 mechanisms.</p>	<p>Submit quarterly reports to the Association commencing after the Effective Date of the Project and throughout Project implementation.</p> <p>Reports to be submitted no later than 15 days after the end of each reporting period.</p>	The Public Private Partnership Commission (PPPC)
B	<p>INCIDENTS AND ACCIDENTS</p> <p>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), gender-based violence, and accidents that result in death, serious or multiple injuries as well as transmission of communicable diseases and vandalism or damage of private or Project property. 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 Association'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 Association of any incident or accident no later than 48 hours after learning of the incident or accident.</p> <p>Provide a detailed report on the incident/accident, if requested, to the Association within a timeframe acceptable to the Association.</p>	PPPC
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 Association.</p>	Submit the monthly reports to the Association as annexes to the reports to be submitted under action A above.	PPPPC

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		
<p>1.1 ORGANIZATIONAL STRUCTURE The PPPC shall maintain the PIU which was established under the Digital Malawi Project (P160533) with qualified and experienced staff and adequate resources to support management of the Projects' ESHS risks and impacts including one Environmental Standards Specialist and one Social Standards Specialist and commensurate number of Third Party Monitoring (TPM) firms.</p>	<p>Hire and/or appoint one Environmental Standards Specialist and Social Standards Specialists prior to the Effective Date of the Project. Hire commensurate number of TPM firms prior to commencement of tower erection activities and maintain throughout sub-activity implementation.</p> <p>The PIU including one Environmental Standards Specialist and one Social Standards Specialist positions shall be maintained throughout Project implementation.</p>	<p>PPPC</p>
<p>1.2 ENVIRONMENTAL AND SOCIAL INSTRUMENTS 1. Adopt and implement an Environmental and Social Management Framework (ESMF), which includes as annexes a GBV/SEA/SH Plan, an Occupational Health and Safety Plan, an E-Waste Management Plan, and a Resettlement Policy Framework , , consistent with the relevant Environmental and Social Standards (ESS). 2. Adopt and implement site-specific ESMPs for activities under the Project for which such ESMPs are required as set out in the ESMF, consistent with the relevant ESSs.</p>	<p>1. Adopt the ESMF with its annexes prior to the Project Effective Date and thereafter implement it throughout Project implementation.</p> <p>2. Adopt the ESMP before launching the bidding process for the respective project activity that requires the adoption of such ESMP. Once adopted, implement the respective ESMP throughout Project implementation.</p>	<p>PPPC</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <p>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.</p>	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation.</p>	PPPC
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project, including, inter alia, the preparation of ESMF, LMP, SEP, E-WMP, ESMPs, RPF and RAPs 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 the technical assistance activities are consistent with ESSs and comply with the terms of reference.</p>	<p>Throughout Project implementation.</p>	PPPC
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p>	<p>Adopt the LMP prior to Project effectiveness and thereafter implement the LMP throughout Project implementation.</p>	PPPC

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>Adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions (written contracts with stipulations on working hours, wages, overtime, leave days, benefits, notice of termination of employment, details of severance or gratuity as applicable), management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response, procurement of safety equipment for enhancement of safety measures), 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.</p> <p>Implement OHS measures taking into account the General and Industry specific Environmental Health and Safety Guidelines (EHSG) and other relevant Good International Industry Practice (GIIP).</p> <p>Develop and cause Contractors to implement Contractor and Employee Codes of conduct with measures for enforcing safety measures for personnel and project activities as well as for preventing and responding to Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH).</p> <p>Incorporate the requirements above in the ESHS specifications of procurement documents and contracts.</p> <p>Codes of conduct and Labour contracts for casual workers shall be translated into local languages.</p>	<p>During implementation of Project activities</p> <p>Prior to mobilization to Project sites.</p> <p>During preparation of bidding documents</p> <p>Prior to commencement of works</p>	<p>PPPC</p> <p>PPPC</p> <p>PPPC</p> <p>PPPC</p>
<p>2.2 GRIEVANCE MECHANISM FOR PROJECT WORKERS</p>		<p>PPPC</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Establish and operate a grievance mechanism for project workers, as described in the LMP and consistent with ESS2.	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>E-WASTE MANAGEMENT PLAN</p> <p>Adopt and implement an E-Waste Management Plan (E-WMP), to manage hazardous and non-hazardous wastes, consistent with ESS3. The E-WMP shall specifically ensure:</p> <ul style="list-style-type: none"> • Identification of all E-Waste sources anticipated through the Project and those generated by the predecessor Digital Foundations Project. • Identify recyclers for E-Wastes, and support start-ups for E-Waste management businesses. • Conduct awareness campaigns for contractors, beneficiary institutions and the communities about E-Waste management practices and opportunities. 	Adopt the E-WMP as an annex to the ESMF at the same timeline as for the adoption of ESMF as per action 1.2 above and thereafter implement the E-WMP throughout Project implementation.	PPPC
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMPs to be prepared under action 1.2 above.</p>	Same timeframe as for the adoption and implementation of the ESMPs	PPPC
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Include measures to manage traffic and road safety risks in a Traffic Management Plan as required in the ESMPs to be prepared under action 1.2 above.</p>	Same timeframe as for the adoption and implementation of the ESMPs.	PPPC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	The Traffic Management Plan shall include measures for traffic and road safety to be implemented across all Project components and by all contractors including, inter alia, consideration of road worthiness of vehicles, use of passenger authorized vehicles, competence of motor vehicle operators, provision of safety signage and codes of conduct for motor vehicle operators as well as passengers.		
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers, risks of labor influx, potential contamination of natural resources in communities, response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.	Same timeframe as for the adoption and implementation of the ESMPs.	PPPC
4.3	GBV/ SEA AND SH RISKS Adopt and implement a GBV/ SEA/SH Action Plans as part of the ESMF, to assess and manage the risks of GBV/ SEA and SH.	Adopt the GBV/ SEA/SH Action Plans 6 months after Project Effectiveness, and thereafter implement the GBV/SEA/SH Action Plan throughout Project implementation.	PPPC
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT POLICY FRAMEWORK Adopt and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.	Adopt the RPF prior to Effective date, and thereafter implement the RPF throughout Project implementation.].	PPPC
5.2	RESETTLEMENT PLANS		PPPC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Adopt and implement a resettlement action plan (RAP) for each activity under the Project for which the RPF requires such RAP, as set out in the RPF, and consistent with ESS5.	Adopt and implement the respective RAP, including ensuring that before taking possession of the land and related assets, full compensation has been provided and as applicable displaced people have been resettled and moving allowances have been provided.	
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Adopt and implement a Biodiversity Management Plan (BMP) as part of the ESMF and ESMP consistent with ESS6.	Adopt the BMP prior to Project Effectiveness and thereafter implement the BMP throughout Project implementation.	PPPC
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
This Standard is not relevant to the Project.			
ESS 8: CULTURAL HERITAGE			
8.2	CHANCE FINDS Describe and implement the chance finds procedures, as part of the ESMF and relevant ESMPs for the Project.	Same timeframe as that for the adoption and implementation of the ESMF and ESMPs.	PPPC
ESS 9: FINANCIAL INTERMEDIARIES			
This Standard is not relevant to the Project.			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION 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	Adopted and disclosed the SEP prior to Project Appraisal, and thereafter implement the SEP throughout Project implementation.	PPPC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation.		
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Maintain and operate an accessible grievance mechanism, 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.</p> <p>The Project shall revise, maintain, and operate the GRM which was already established under the Digital Foundation Project (P160533). The GRM structures shall be re-established and oriented for them to adopt the new project.</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>Revise the Digital Foundation Project grievance mechanism and disclose it prior to Project effectiveness, and thereafter maintain and operate the mechanism throughout Project implementation.</p> <p>Operate the GRM for the Project at Project Effectiveness.</p> <p>Reestablish GRM structures prior to Project effectiveness.</p>	PPPC
CAPACITY SUPPORT			
CS1	<p>Part of the Project funds shall be used to provide training as identified through training needs assessments such as:</p> <p>Training in business areas including Project management, E-Waste management, Occupational Health and Safety and Climate change aspects of digitalization projects (Decarbonization and Net Zero to E&S Personnel to improve capacity in delivery of E&S requirements for the project.</p>	<p>Prior to development and implementation of ESS documentation and E&S measures and to continue throughout the Project implementation period where need arises.</p> <p>Develop, adopt, and implement a Training Plan 3 months after the Project Effective Date and thereafter implement throughout Project implementation.</p>	PPPC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Training led by E&S Specialist shall target groups including the Project Steering Committee, PIU staff, stakeholders, communities, GRM Committee members at different GRC levels and Project workers on:</p> <ul style="list-style-type: none"> • ESF requirements • stakeholder mapping and engagement processes • specific aspects of environmental and social assessment including ESS instruments • emergency preparedness and response • community health and safety • GRM operational processes • Code of conduct in project sites • Labour Management Procedures • Environmental and Social Commitment Plan • Roles and responsibilities for E&S implementation • Waste management • Managing GBV/ SEA/ SH risks • ESF Good Practice Notes <p>Stakeholder consultation including awareness and sensitization meetings to capacitate local communities on Project implementation.</p>		
CS2	<p>Conduct training for Project workers on Occupational Health and Safety including on emergency prevention and preparedness and response arrangements to emergency situations.</p>	Throughout Project implementation.	PPPC