

REPUBLIC OF MADAGASCAR

**East Africa Girls' Empowerment and
Resilience Program (EAGER - P179293)
Phase 1**

**Environmental and Social Commitment Plan
(ESCP)**

Draft for Negotiation

April 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Madagascar (the **Recipient**) will implement the East Africa Girls' Empowerment and Resilience Program (the **Project**) with the involvement of the Ministry of National Education (MNE), as set out in the Financing Agreement. The International Development Association (the **Association**) has agreed to provide financing 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 (**ESS**) 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 MNE and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the General Secretary of the Ministry of National Education. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLES ENTITY /AUTHORITY
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 performance (ESHS) of the Project, including, but not limited to, the implementation of the ESCP, the status of the preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities and the functioning of grievance mechanisms.</p>	<p>Submit quarterly reports to the Association throughout Project implementation, commencing 30 days after the Effective Date. Submit each report to the Association no later than 15 days after the end of each reporting period.</p>	<p>MNE and its Project Implementation Unit (PIU).</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project and its sub-projects 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. 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 supervising entity, as appropriate.</p> <p>Subsequently, at the request of the Association, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Association within 48 hours after learning of the incident or accident and within 24 hours for any fatalities or SEA/SH incidents.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association</p>	<p>MNE/PIU</p>
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>	<p>Submit monthly reports to the Association</p>	<p>MNE, PIU and the contractor(s)</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLES ENTITY /AUTHORITY
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>a) Maintain the Project Implementation Unit (PIU) of the ongoing Basic Education Support Project (P160442) with one qualified environmental specialist and one SEA/SH specialist and hire one additional social and gender specialist to support management of ESHS risks and impacts.</p> <p>b) At the regional level, hire one Environmental Specialist and one Social Specialist.</p> <p>c) Mobilize necessary additional staff (consultants) required for short or long-term assignments in accordance with the assessment or institutional need throughout project implementation.</p>	<p>a) Maintain the existing environmental specialist and the SEA/SH specialist throughout project's implementation. Hire the social and gender specialist no later than 2 months after the Effective Date, and then maintain these positions throughout the implementation of the Project.</p> <p>b) Environmental and Social Specialists at the regional level shall be hired within 3 months after the Effective Date and thereafter maintained throughout the implementation of the project.</p> <p>c) Additional staff to be mobilized throughout Project's implementation.</p>	MNE/PIU
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>a) Prepare, disclose, consult, adopt and implement an Environmental and Social Management Framework (ESMF). The Project ESMF shall include Labor Management Procedures (LMP), Gender Based Violence (GBV)/sexual exploitation and abuse (SEA) and sexual harassment (SH) risks assessment and action plan.</p> <p>b) Once the sub-projects sites have been identified, the Borrower shall screen any proposed sub-project activities and, in accordance with the ESMF prepared for the Project, draft, adopt, and implement the site-specific Environmental and Social Management Plan (ESMP), or other site-specific E&S instrument as required, all in accordance with the ESSs.</p>	<p>a) ESMF finalized, consulted upon, disclosed, and adopted no later than 30 days after effectiveness date, and thereafter implemented throughout the Project implementation. Any subsequent updates shall be submitted to the Association for approval.</p> <p>b) Sub-projects screenings conducted, approved by the Association, and finalized prior to commencement of any relevant activities in the sub-projects site. Site-specific instruments approved by the Association, disclosed, and starting their implementation before commencing sub-projects.</p>	MNE/PIU.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLES ENTITY /AUTHORITY
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>	ESHS specifications integrated as part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation.	MNE/PIU.
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, capacity building, training, and any other technical assistance activities under the Project, including draft laws, regulations, protocols, toolkits, and other materials, 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. Terms of reference shall be prepared for technical assistance under the project and submitted to the Association for Approval prior to activities implementation.</p>	Throughout Project Implementation	MNE/PIU.
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Prepare, consult, disclose, adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, Occupational Health and Safety (including personal protective equipment, and emergency preparedness and response), 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>As for the ESMF, the LMP shall finalized, consulted upon, disclosed, and adopted within 30 days after Effective Date and thereafter implemented throughout Project implementation.</p> <p>Any subsequent updates to the LMP shall be submitted to the Association for approval prior to implementation</p>	MNE/PIU
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers (W-GM), as described in the LMP and consistent with ESS2.</p>	Establish W-GM prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	MNE/PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLES ENTITY /AUTHORITY
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above, including, inter alia biohazard waste management as part of the ESMF.	Adopt measures and actions as part of ESMF and ESMPs following timeframe specified in 1.2 a)	MNE/PIU.
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY Relevant aspects of this standard, such as GBV/SEA/SH, community health and safety, and exclusion risks, among others, shall be considered, as needed, under action 1.2 above.	Adopt measures and actions as part of ESMF and ESMPs following timeframe specified in 1.2. Thereafter, implement measures and actions throughout project implementation.	MNE/PIU.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLES ENTITY /AUTHORITY
4.3	<p>SEA AND SH RISKS</p> <p>a) Prepare, consult, and disclose a GBV/SEA/SH risks assessment as part of ESMF.</p> <p>b) Prepare, consult, disclose, and implement a GBV/SEA/SH Action Plan (GBV/SEA/SH AP). The GBV/SEA/SH AP shall contain a set of measures to increase accountability, prevent GBV/SEA/SH, and mitigate the risk of GBV/SEA/SH, including but not limited to developing codes of conduct for workers and promoting GBV/SEA/SH risk awareness training for Project stakeholders. The GBV/SEA/SH AP shall include clear procedures on how to collect, respond to, and manage GBV/SEA/SH cases safely and ethically, including mapping of GBV/SEA/SH service providers, responsibility and accountability framework, referral pathway, and GBV/SEA/SH-sensitive Grievance Mechanism (GM). Funding must be available for recruitment of SEA/SH services providers to facilitate access to timely, safe and confidential services for survivors (including money for transportation, documentation fees, and lodging if needed).</p> <p>c) Schools personnel shall apply GBV/SEA/SH measures as specified in the GBV AP.</p> <p>d) Ensure that all bidding documents, contracts for work or services other than consulting services for the Project require suppliers or service providers, subcontractors or consultants to adopt a code of conduct that shall be signed by Project workers.</p>	<p>GBV/SEA/SH risk assessment and GBV AP finalized consulted upon, disclosed, and adopted as part of ESMF and following timeframe specified in 1.2.</p> <p>The Project's GM with SEA/SH sensitive measures shall be operational, the SEA/SH Codes of Conduct shall be signed by workers, and SEA/SH training shall be provided prior to the start of any Project activities.</p> <p>SEA/SH mitigation measures to be implemented throughout the Project per GBV AP.</p>	MNE/PIU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
	Not relevant		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	Not relevant		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Not relevant		
ESS 8: CULTURAL HERITAGE			
	Not relevant		
ESS 9: FINANCIAL INTERMEDIARIES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLES ENTITY /AUTHORITY
	Not relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>PREPARATION AND IMPLEMENTATION OF THE STAKEHOLDER ENGAGEMENT FRAMEWORK: Prepare, consult, disclose, adopt, and implement a Stakeholder Engagement Framework (SEF) and a Stakeholder Action 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. If needed, update the SEF and SEP during project implementation.</p>	<p>SEF and SEP have been finalized, adopted, and disclosed by Appraisal and shall be implemented throughout Project implementation.</p> <p>Any subsequent updates to the SEF and SEP must be submitted to the Association for non-objection. Thereafter, the SEF and SEP shall be implemented throughout Project implementation.</p>	MNE/PIU
10.2	<p>PROJECT GRIEVANCE MECHANISM (GRM): a) Establish, publicize, maintain, and operate a GBV/SEA/SH-sensitive 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. b) 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 SEA/SH service providers, all in a safe, confidential, and survivor-centered manner.</p>	<p>Establish the GM no later than 3 months after Effective Date and thereafter maintain and implement it throughout Project implementation. Grievance report submitted to the Association on a quarterly base.</p>	MNE/PIU
CAPACITY SUPPORT (TRAINING)			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLES ENTITY /AUTHORITY
CS1	<p>Capacity Building program:</p> <p>a) For Project's PIU workers shall include (non-exhaustive list):</p> <ul style="list-style-type: none"> - World Bank Environmental and Social Framework (ESF) - E&S risks identification and management - Stakeholder Engagement and Information Disclosure - Labor Management Procedures (LMP) - Community Health and Safety (CHS) - Grievance Mechanisms (GM) - SEA/SH risks identification, prevention, response, and mitigation. - Inclusion of vulnerable and disadvantaged groups in the consultation process - Emergency Preparedness and Response <p>b) For contractors and subcontractors shall include (non-exhaustive list):</p> <ul style="list-style-type: none"> - ESF, ESHS, and World Bank Group EHS guidelines and GBV/SEA/SH prevention and response 	<p>Capacity building training shall start no later than 3 months after the Effective Date and be continued on a regular basis, as new members join the Project Team, throughout the implementation of the Project.</p>	<p>MNE/PIU</p>