

Kingdom of Lesotho
P177814

Pathways to Sustainable Livelihoods Project

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

DRAFT

[TBD - Date of Negotiations]

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Kingdom of Lesotho (Recipient) will implement the Pathways for Sustainable Development Project (the Project), with the involvement of the Ministry of Social Development (MoSD), as set out in the Financing 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 Ministry of Social Development (MoSD), and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient. 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 mechanism(s).</p>	<p>Monthly reporting throughout project implementation.</p> <p>Semi-annually as part of Project progress reports.</p>	<ul style="list-style-type: none"> PMU within MoSD
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), 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/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 no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association.</p>	<ul style="list-style-type: none"> PMU within MoSD
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain a Project Management Unit (PMU) with qualified staff and resources to support management of ESHS risks and impacts of the Project an Environmental and Social Specialist (namely 1 E&S Officer on a part-time basis and PMU Coordinator)</p>	<p>The Organizational structure should be fully established within 90 days after Project effectiveness.</p> <p>The organizational structure, including the specialists, should be maintained throughout Project implementation.</p>	MoSD
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>1. Develop, disclose and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p>	<p>1. Adopt the ESMF prior to Appraisal, and thereafter implement the ESMF throughout Project implementation.</p>	PMU within MoSD

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	2. Cause all subprojects to adopt and implement the site-specific Environmental and Social Management Plan (ESMP), as set out in the ESMF. The proposed subprojects described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.	2. Adopt the ESMP prior to the carrying out of subproject that requires the adoption of such ESMP. Once adopted, implement the respective ESMP throughout Project implementation.	
1.4	TECHNICAL ASSISTANCE Ensure that the consultancies, 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 the project implementation.	<ul style="list-style-type: none"> PMU within MoSD
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Develop, disclose, and implement the Labor Management Procedures (LMP), as part of ESMF, 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>To be developed and disclosed before Appraisal.</p> <p>To be implemented throughout project implementation.</p>	<ul style="list-style-type: none"> PMU within MoSD
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	<p>To be established before Appraisal.</p> <p>To be implemented throughout project implementation.</p>	<ul style="list-style-type: none"> PMU within MoSD
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared.	Once adopted, implement the ESMP requirements throughout Project implementation.	<ul style="list-style-type: none"> PMU within MoSD
3.2	WASTE MANAGEMENT PLAN Adopt and implement a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes, e-waste, consistent with ESS3.	Prepare and adopt the WMP, prior to Appraisal, and thereafter implement the WMP throughout Project implementation.	<ul style="list-style-type: none"> PMU within MoSD
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY	To be prepared before Appraisal.	<ul style="list-style-type: none"> PMU within MoSD

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Prepare, adopt and implement occupational health and safety (OHS) measures as defined in the ESMF, including specific measures to ensure that all Project activities minimize the spread of COVID-19 infections, as defined in the ESMF.</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.</p>	To be implemented throughout project implementation.	
4.3	<p>SEA AND SH RISKS</p> <p>SEA AND SH RISKS and NoN SEA/SH GBV risks</p> <p>Develop and implement a GBV Action plan that includes SEA/SH and GBV Action Plan, as part of the ESMF, to assess and manage the risks of SEA and SH and GBV related to cash transfers.</p>	<p>To be prepared before Appraisal.</p> <p>To be implemented throughout project implementation.</p>	<ul style="list-style-type: none"> • MoSD • PSAP - PMU • E&S specialist • Consultant
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Develop 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.</p>	Adopt the SEP prior to Appraisal and thereafter implement the SEP throughout Project implementation.	<ul style="list-style-type: none"> • PMU within MoSD •
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, 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 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>	GRM to be established before appraisal and maintained throughout project implementation.	<ul style="list-style-type: none"> • MoSD • PSAP - PMU
CAPACITY SUPPORT			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>CS1 The GoL will design and implement training for targeted groups involved in the Project to improve their awareness of risks and mitigate the impacts of the PSAP. The target groups for training include PMU staff, stakeholders, communities, Project workers.</p> <p>This ESCP proposes a preliminary training plan covering the following topics.</p> <ul style="list-style-type: none"> • ESF Requirements (ESCP, ESMF/ESMP, and SEP) • Roles and responsibilities for environmental and social issues • Occupational health and safety (including COVID-19 recommendation) • Labor requirements • Emergency prevention and preparedness and response arrangements to emergencies • Managing GBV/SEA/SH risks • Maintaining GRM and keeping GRM log • Waste Management 	<p>Training for PMU and project staff delivered within 90 days following project effectiveness.</p> <p>Training for PMU consultants Repeated as necessary throughout the project.</p> <p>This plan will be adapted to meet needs during Project implementation.</p>	<ul style="list-style-type: none"> • PMU within MoSD • World Bank