

Republic of South Sudan

**Ministry of Information, Communication Technology and
Postal Services (MICT&PS)**

Eastern Africa Regional Digital Integration Project (P176181)

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

12 January 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of South Sudan (the Recipient) will implement the Eastern Africa Regional Digital Integration Project (the Project), with the involvement of the Ministry of Information, Communication Technology and Postal Services (MICT&PS), 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 (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 MICT&PS 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's Minister of MICT&PS 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.</p>	<p>Submit quarterly reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than 30 days after the end of each reporting period.</p>	<p>National Project Implementation Unit (PIU) at the Ministry of Information, Communication Technology and Postal Services (MICT&PS)</p>
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 within 48 hours after learning of the incident or accident using such reporting formats as the Association may specify.</p> <p>A detailed report of the incident shall be provided within fifteen (15) days of notifying the Association of the incident or accident, unless a different timeline is agreed with the Association throughout the Project implementation.</p>	<p>National PIU at the MICT&PS</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 the monthly reports to the Association upon request.</p>	<p>National PIU at the MICT&PS</p>
D	<p>NOTIFICATIONS RELATING TO DAAB COMPLIANCE REVIEW OF CONTRACTOR COMPLIANCE WITH SEA/SH PREVENTION AND RESPONSE OBLIGATIONS</p> <p>Notify the Association of any referral submitted to the Dispute Avoidance and Adjudication Board (DAAB) to initiate a process of compliance review in relation to a contractor’s obligations to prevent and respond to sexual exploitation and abuse (SEA), and/or sexual harassment (SH) specified in the respective works contract with such contractor; and, in the event of any such referral, notify the Association of: (i) the DAAB’s decision on such referral; (ii) the contractor’s Notice of Dissatisfaction, if any, with such DAAB decision; (iii) any notification received on the commencement of an emergency arbitration proceeding or full arbitration proceeding in relation to the DAAB’s</p>	<p>No later than 7 days after the issuance or receipt, as applicable, of the relevant document (i.e., referral to the DAAB, issuance of DAAB decision, Notice of Dissatisfaction, notice of commencement of emergency/full arbitration, emergency/full arbitration order, as applicable).</p>	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	decision; and (iv) the resulting emergency arbitration order and/or full arbitration order, if any.		
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain a PIU with qualified staff and resources to support management of ESHS risks and impacts of the Project including one environmental risk expert and one social risk management expert.</p> <p>In addition, the PIU will be supported by one Security Specialist, one Environmental and one Social risk management consultant and other thematic consultants as required (e.g. in regards to Occupational Health and Safety (OHS), GRM, Gender Based Violence (GBV) etc.</p>	<p>Establish and maintain the PIU as set out in the Financial Agreement no later than the Effective Date, including engaging the environmental risk management expert, the social risk management expert, and the security specialist. Maintain these positions throughout Project implementation.</p> <p>Consultants shall be hired throughout Project implementation when required as agreed with the Association and specified in the Project Implementation Manual (PIM).</p>	National PIU at the MICT&PS
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>1. Prepare, disclose, consult upon and adopt and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs, including:</p> <ul style="list-style-type: none"> a) Project-wide environmental and social risk assessment in line with ESS1-ESS10 b) Exclusion list c) Labor Management Procedures (LMP) d) Resettlement Policy Framework (RPF) e) Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) Action Plan f) Procedures for managing contractors g) Monitoring and reporting system h) Capacity Building and Training Plan i) Chance Find Procedures j) E-Waste Management Plan <p>2. Prepare, disclose, consult upon, adopt and implement site-specific Environmental and Social Impact Assessments (ESIAs) and/or Environmental and Social Management Plans (ESMPs) as set out in the ESMF. The activities described in the exclusion list shall be ineligible to receive financing under the Project.</p>	<p>1. Adopt the ESMF prior to Project Effective Date and thereafter implement throughout Project implementation.</p> <p>2. Adopt the site-specific ESIA/ESMP before launching the bidding process for the respective Project activity that requires the adoption of such ESIA/ESMP. Once adopted, implement the respective instruments throughout Project implementation.</p>	National PIU at the MICT&PS

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1.3	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, as listed under 1.2. (ESIA, ESMP, RAP, LMP) 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>	As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation.	National PIU at the MICT&PS
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 are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	National PIU at the MICT&PS
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt and implement , as part of the ESMF, the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (OHS) (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA / SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	Adopt the LMP, as part of the ESMF, prior to effective date and thereafter implement the LMP throughout Project implementation.	National PIU at the MICT&PS
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Design grievance mechanisms as part of the LMP/ESMF, prior to Effective Date, and establish grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.	National PIU at the MICT&PS
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Adopt and implement an E-Waste Management Plan (E-WMP), to manage hazardous and non-hazardous wastes, specifically construction wastes generated during excavation for fiber laydown and / or access road construction, consistent with ESS3.</p>	Same timeframe as under Section 1.2 (1) above.	National PIU at the MICT&PS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate generic resource efficiency and pollution prevention and management measures as per GIIPs and include in the respective sub-project specific ESMPs/ESIAs where applicable, including for construction waste generated during the excavation for fiber laydown and/ or access road construction.	Same timeframe as for the adoption and implementation of the ESMF under Section 1.2 (1) above. Inclusion in site-specific ESMPs same timeline for adoption and implementation as ESIA/ESMPs under Section 1.2 (2) above.	National PIU at the MICT&PS
ESS 4: COMMUNITY HEALTH AND SAFETY [
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the site-specific ESMPs/ESIAs to be prepared under action 1.2.(2) above.	Same timeframe as for the adoption and implementation of the ESMPs/ESIAs under Section 1.2 (2) above.	National PIU at the MICT&PS
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities, including in relation to e-waste, labor influx and other issues, and include mitigation measures in the ESMPs/ESIAs to be prepared in accordance with the ESMF.	Same timeframe as for the adoption and implementation of the ESMPs/ESIAs under Section 1.2 (2) above.	National PIU at the MICT&PS
4.3	SEA AND SH RISKS Adopt and implement a SEA/SH Action Plan as part of the ESMF (1.2.) to assess and manage the risks of SEA and SH.	Same time frame as for the adoption and implementation of the ESMF under Section 1.2 (1) above	National PIU at the MICT&PS
4.4	SECURITY MANAGEMENT Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, as set out in the Security Risk Assessment and Management Framework (SRAMF) guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.	Same timeframe as for the adoption and implementation of the ESMF under Section 1.2 (1) above.	National PIU at the MICT&PS
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, as part of the ESMF (1.2.)	Same timeframe as for the adoption and implementation of the ESMF, under Section 1.2 (1) above.	National PIU at the MICT&PS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
5.2	RESETTLEMENT PLANS Adopt and implement a resettlement action plan (RAP) for each activity under the Project for which the RF requires such RP, as set out in the RF, and consistent with ESS5.	Adopt and implement the respective RAP-before commencing the relevant Project activity, including ensuring that before taking possession of the land and related assets, full compensation has been provided and displaced people have been resettled and moving allowances have been provided.	National PIU at the MICT&PS
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Where relevant, adopt and implement mitigation measures and a mitigation hierarchy, in particular to risks associated with sensitive habitats, as part of the sub-project specific ESIA or ESMP, consistent with ESS6.	Adopt measures with the same timeline as the site-specific ESMP/ESIA under Section 1.2 (2) above and thereafter implement throughout Project implementation.	National PIU at the MICT&PS
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	INDIGENOUS PEOPLES Prepare, disclose, consult, adopt and implement relevant instruments (such as an IPPF/IPP) when project sites are identified as required	Adopt and implement relevant instruments (e.g., IPPF/IPP) and throughout project implementation.	National PIU at the MICT&PS
ESS 8: CULTURAL HERITAGE			
8.1	CHANCE FINDS Project activities/subprojects will be implemented only in areas selected, through a consultative process; an exclusion list for activities that can have significant adverse impacts on ESS8; and address activities which have potential substantial adverse impacts on a known cultural heritage site through the ESMF screening process. Describe and implement the chance find procedures, as described in the ESMF of the Project and any other measures needed in accordance with ESS8; and will be detailed in site-specific ESMPs/ESIAs .	Same timeframe as for the adoption and implementation of the ESMF under Section 1.2 (1) above. Inclusion in site-specific ESMPs same timeline for adoption and implementation as ESIA/ESMPs under Section 1.2 (2) above.	National PIU at the MICT&PS
ESS 9: FINANCIAL INTERMEDIARIES – This standard is not relevant			
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 accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	Adopt and disclose the SEP prior to Project appraisal and thereafter implement the SEP throughout Project implementation.	National PIU at the MICT&PS
10.2	PROJECT GRIEVANCE MECHANISM		National PIU at the MICT&PS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<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>	<p>Establish the grievance mechanisms four weeks after Project Effective Date and thereafter maintain and operate the mechanism throughout Project implementation.</p>	
CAPACITY SUPPORT			
CS1	<p>Training shall be provided to PIU staff, contractors communities on:</p> <ul style="list-style-type: none"> ● stakeholder mapping and engagement ● specific aspects of environmental and social assessment and screening ● GRM ● Implementation and monitoring of ESMPs ● Resettlement Plan implementation ● emergency preparedness and response ● community health and safety. ● SEA/SH awareness ● Code of Conduct ● E-Waste management 	<p>Throughout Project implementation, as specified in the ESMF</p>	<p>National PIU at the MICT&PS</p>
CS2	<p>Training for Project workers shall be required on topics, including:</p> <ul style="list-style-type: none"> ● Occupational health and safety (OHS) including on emergency prevention and preparedness and response arrangements to emergency situations. ● Workers' GRM ● Code of Conduct ● SEA/SH awareness ● LMP 	<p>Throughout Project implementation, as specified in the ESMF</p>	<p>National PIU at the MICT&PS</p>