

**Common Market for Eastern and Southern Africa**

**(COMESA)**

**Inclusive Digitalization in Eastern & Southern Africa - Multi-Phase Programmatic Approach (MPA)**

**(P502532)**

**Negotiations version**

**ENVIRONMENTAL and SOCIAL**

**COMMITMENT PLAN (ESCP)**

**April 2024**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. The Common Market for Eastern and Southern Africa (COMESA) (the Recipient) will implement the Inclusive Digitalization in Eastern & Southern Africa Multi-Phase Programmatic Approach (P502532) (the Project), 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 ESSs, 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 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 COMESA Secretary General. The Recipient shall promptly disclose the updated ESCP.

| **MATERIAL MEASURES AND ACTIONS** | | **TIMEFRAME** | **RESPONSIBLE ENTITY** |
| --- | --- | --- | --- |
| **MONITORING AND REPORTING** | | | |
| A | **REGULAR REPORTING**  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, including those related to Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH). | Submit quarterly reports to the Association throughout Project implementation, commencing 90 days after the Effective Date. Submit each report to the Association no later than 30 days after the end of each reporting period. | COMESA |
| B | **INCIDENTS AND ACCIDENTS**  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 SEA/SH, and accidents that result in death, serious or multiple injury, alleged violations of labor laws (forced and child labor) and working conditions, cases of gender-based and other discrimination such as exclusion of vulnerable people (women, youth, people with disabilities, minority and disadvantaged groups).  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  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. | Notify the Association no later than 48 hours after learning of the incident or accident, and no later than 24 hours after learning of any fatality or SEA/SH incident.  Provide subsequent report within a timeframe acceptable to the Association. | COMESA |
| C | **CONSULTING FIRMS MONTHLY REPORTS**  Require Consultants to provide monthly monitoring reports on environmental, social, health and safety (ESHS) performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association. | Submit the monthly reports to the Association as annexes to the reports to be submitted under action A above*.* | COMESA |
| **ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS** | | | |
| 1.1 | **ORGANIZATIONAL STRUCTURE**   1. Establish and maintain the Project’s regional Program Coordination Unit (PCU) at the COMESA Secretariat. 2. To support the management of ESHS risks and impacts of the Project, the PCU shall recruit and maintain an environmental expert with OHS expertise, a social expert, and a stakeholder engagement/communication expert and train and sensitize them on the World Bank’s ESF/ESSs requirements to enable them to review consultancy ToRs and reports to ensure they are in line with the ESF/ESSs 3. Mobilize additional staff or consultants including interns as needed on short-term and long-term engagements in accordance with capacity building and institutional needs assessment; | 1. Establish PCU prior to the Project Effective Date and maintain throughout Project implementation. 2. Recruit the qualified environmental, social, and stakeholder engagement/ communication experts no later than 60 days after the Project Effective Date and thereafter maintain these positions throughout Project implementation. 3. Throughout Project implementation. | COMESA |
| 1.2 | **ENVIRONMENTAL AND SOCIAL INSTRUMENTS**  Update and implement the Stakeholder Engagement Plan (SEP) in form and substance acceptable to the Association. | Draft SEP was adopted and disclosed by the Association and COMESA on May 6, 2024, and shall be updated no later than 90 days after the Effective Date, and thereafter implement it throughout Project implementation. | COMESA |
| 1.3 | **MANAGEMENT OF CONTRACTORS**  Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, labor and other relevant provisions in the Project Operations Manual (POM), and SEA/SH code of conduct, into the ESHS specifications of the procurement documents and contracts with consultants and other service providers. Thereafter ensure that consultants and service providers comply with the ESHS specifications of their respective contracts, including SEA/SH aspects. | As part of the preparation of procurement documents and respective consultancy contracts. | COMESA |
| 1.4 | **TECHNICAL ASSISTANCE**  Ensure that the consultancies, studies (including feasibility studies, if applicable), 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 Project implementation. | COMESA |
| **ESS 2: LABOR AND WORKING CONDITIONS** | | | |
| 2.1 | **LABOR MANAGEMENT PROCEDURES**  Adopt and implement key relevant provisions of the Labor Management Procedures (LMP) developed for the ASCENT Project’s (P180547) COMESA operations in the IDEA COMESA POM including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety plans (including personal protective equipment, and emergency preparedness and response if applicable), code of conduct (including relating to SEA/SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for consultant firms. | Adopt the labor management procedures contained in the POM prior to Project Effective Date and thereafter implement those procedures throughout Project implementation. | COMESA |
| 2.2 | **GRIEVANCE MECHANISM FOR PROJECT WORKERS**  Adopt, adhere to and operate the IDEA COMESA Project Worker Grievance Mechanism (GM) established under the ASCENT (P180547) COMESA operations LMP, and consistent with ESS2. | Operationalize the worker GM prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation. | COMESA |
| **ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT** | | | |
| **NOT RELEVANT** | | | |
| **ESS 4: COMMUNITY HEALTH AND SAFETY** | | | |
| **NOT RELEVANT** | | | |
| **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** | | | |
| **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. | Timeframe indicated in 1.2. | COMESA |
| 10.2 | **PROJECT GRIEVANCE MECHANISM**  Adapt, adopt and operate the grievance mechanism implemented by COMESA under the ASCENT project (P180547), in coordination with ASCENT, to receive and facilitate resolution of concerns and grievances in relation to the IDEA Project COMESA operations, promptly and effectively, in a transparent and non-discriminatory 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.  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. | Draft Project GM was adopted and disclosed (as part of SEP) on May 6, 2024, and shall be updated and operationalized no later than 90 days after the Project Effective Date.  Thereafter maintain and operate the mechanism throughout Project implementation. | COMESA |
| **CAPACITY SUPPORT** | | | |
| CS1 | PCU staff and consultant training on:   1. Stakeholder Engagement Plan (SEP) – stakeholder mapping and engagement, and the functioning of the project’s grievance mechanisms 2. Specific relevant aspects of environmental and social assessment, gender considerations 3. Emergency preparedness and response 4. Labor Management Procedures (LMP) including a Code of Conduct for project workers in relevant languages and Labor Specific GRM 5. World Bank ESHS requirements for ESF and WB EHS Guidelines (including those for Telecommunications and (where relevant) Electric Power Transmission and Distribution), 6. SEA/SH Action Plan including GBV issues 7. Project wide GRM 8. Occupational Health and Safety (OHS) Plan | Within 12 months of the Project Effective Date. | COMESA with World Bank support |