

Ministry of Finance and Planning

South Sudan Public Financial Management and Institutional Strengthening Project (P176761)

Draft

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

January 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of South Sudan (hereinafter the Recipient) will implement the Public Financial Management and Institutional Strengthening Project (hereinafter the Project), with the involvement of the following Ministries and agencies: Ministry of Finance and Planning (MOFP); Ministry of Public Service; Ministry of Agriculture and Food Security (MAFS); Ministry of Education; National Audit Chamber (NAC); and South Sudan Anticorruption Commission (SSACC). The International Bank for Reconstruction and Development (hereinafter The World Bank) has agreed to provide financing for the project.
2. The Recipient will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The Recipient will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as a Stakeholder Engagement Plan (SEP), a Labor Management Procedures (LMP) and the timelines specified in those E&S documents.
4. The Recipient is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the World Bank by the Recipient as required by the ESCP and the conditions of the legal agreement, and the World Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the World Bank and the Recipient, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Recipient, through the MOFP will agree to the changes with the World Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the World Bank and the Recipient. The Recipient will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the World Bank regular monitoring reports on the environmental, social, health and safety (ESHS) compliance and performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of environmental and social (E&S) documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	<p>Quarterly throughout project implementation.</p>	<p>MOFP/PMU</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify any incident or accident related or having an impact on the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including without limitation any allegations of gender-based violence, Project-related occupational accidents or fatalities, or labor unrest. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken to address it and further remediation action plan where required</p>	<p>Notify the Association within 48 hours after learning of the incident or accident using such reporting formats as the Association may require.</p> <p>A detailed report of the incident shall be provided within fifteen (15) days of making the initial report of the incident or accident, unless a different timeline is agreed with the Association.</p>	<p>MOFP/PMU</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>The Ministry of Finance and Planning (MOFP) shall establish and maintain a Project Management Unit (PMU) with a functional environmental and social risk management organizational structure throughout project implementation with one Environmental and one Social Safeguards Specialist, shared with the South Sudan Enhancing Community Resilience and Local Governance Project Phase II (ECRP-II, P177093).</p>	<p>The qualified E&S specialist shall be appointed one month after effectiveness. The organizational structure, including the E&S specialists, should be maintained throughout project implementation.</p>	<p>MOFP/PMU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND CONTRACTORS</p> <p>a. Prepare, disclose, adopt, and implement the E-Waste Management Plan (E-WMP), Stakeholder Engagement Plan (SEP), a SEA/SH plan proportionate to the risk and a simplified Labor Management Procedures (LMP), in accordance with the ESSs, in a manner acceptable to the Association.</p> <p>b. Update and implement the safeguards instruments based on updated guidance by WHO on COVID-19.</p> <p>c. Terms of References (TORs) for relevant Technical Assistance (TA) will include assessment of potential environmental and social implications and measures to ensure that the advice provided through the TA for addressing those implications is consistent with the ESF. The TORs will be reviewed and cleared by the World Bank.</p>	<p>a. The LMP shall be prepared, cleared, and disclosed and the SEP updated, cleared and disclosed prior to disbursement. The E-WMP shall be prepared, cleared and disclosed before computers and equipment are procured.</p> <p>b. Throughout project implementation.</p> <p>c. Prior to the TA provision</p>	MOFP/PMU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>a. Relevant aspects of this standard shall be considered, as needed, under action 1.2 above.</p>	Throughout project implementation.	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.2	<p>LABOR MANAGEMENT</p> <p>The Project shall be carried out in accordance with the applicable requirements of ESS2 including through, inter alia, implementing adequate occupational health and safety measures (including use of personal protective equipment, , prohibition of child labor and forced labor, drafting codes of conducts including clauses and sanctions against Gender-based violence and/or sexual exploitation, abuse and harassment (GBV/SEA-H) behaviors, setting out grievance mechanisms for Project workers sensitive to GBV/SEA-H risks, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts). All staff shall be trained on GBV/SEA-H risks and codes of conduct expectations before starting work through project implementation.</p> <p>These requirements shall be detailed in Labor Management Procedures (LMP) and considered as required in the plans, instruments and measures outlined under action 1.2 above.</p>	The LMP shall be prepared and disclosed prior to disbursement.	MOFP/PMU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>Develop and implement measures and actions to manage electronic waste and hazardous materials. An E-Waste Management Plan and relevant training will be prepared and adopted regarding proper handling and safe disposal of e-waste including other general and paper waste expected to be generated as the system become automated and voluminous archived paper records become redundant.</p> <p>One day of mandatory e-waste management training for contractors and government ministry staff.</p>	Prior to disbursement or before computers and equipment are procured and replaced, whichever takes place first.	MOFP/PMU
ESS 4: COMMUNITY HEALTH AND SAFETY			
ESS 4 is not currently relevant. The Project will neither finance nor support civil works. No rehabilitation or construction of new infrastructure or other actions that would imply environmental or social risk or having negative impact on the environment or community health and safety will be financed. Community health and safety risks originating from e-waste management will be addressed (e.g., in order to avoid negative impacts of e-waste scavenging) as part of the E-Waste Management Plan to be developed.			
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
ESS 5 is not currently relevant. The Project will not include any activities which require land acquisition, physical and/or economic displacement.			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 6 is not currently relevant. The Project will neither finance nor support any civil works or policies that might affect biodiversity or management of living natural resources.		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES		
7.1	The Project through its SEP shall provide adequate, culturally appropriate forms of meaningful consultations and linguistically relevant content on the PFM reform process and the implication of this on the agriculture and education sectors and beyond. The SEP shall include the social, political, and economic dynamics of financial planning and projections. A social assessment will guide the Project on how to mainstream respective measures and suggest additional activities to address particular vulnerabilities.	The SEP shall be updated prepared and disclosed prior disbarment. The SEP shall be implemented throughout Project implementation.
MOFP/PMU		
ESS 8: CULTURAL HERITAGE		
ESS 8 is not currently relevant. The Project will finance technical activities aimed at improving public financial management. In this context, it is not expected that it could directly or indirectly affect tangible or intangible cultural heritage.		
ESS 9: FINANCIAL INTERMEDIARIES		
ESS 9 is not currently relevant. The Project will not make use of or support financial intermediaries as defined by this standard.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE		
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Prepare and adopt the Stakeholder Engagement Plan (SEP) which shall include measures to, inter alia, (i) 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, and (ii) includes measures to reach tribal groups and ensure they are meaningful consulted with throughout Project implementation, are informed and have access to the project in a culturally appropriate manner.</p>	Adopt and update the SEP prior to disbursement of funds and commencement of project activities. The SEP shall be implemented throughout project implementation.
MOFP/PMU		

10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>The Project will harness existing GRMs if they are deemed appropriate. The grievance mechanism shall be publicized, maintained, and operated 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 (including ensuring that tribal groups are able to access the Project’s grievance mechanism in a culturally appropriate manner), at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall also receive, register, and address concerns and grievances related to GBV/SEA-H in a safe and confidential manner and shall include the referral of survivors to GBV/SEA-H service providers.</p>	Throughout project implementation.	MOFP/PMU
CAPACITY SUPPORT (TRAINING)			
CS1	<p>Training topics will among others include:</p> <ul style="list-style-type: none"> • Management and disposal of Electronic Waste • Capacity enhancement support including training for PMU staff based on the identified need to support project risk and E&S impact management. • Grievance redress mechanisms • COVID-19 Infection Prevention and Control Recommendations • Risk and prevention of gender-based violence, including the mechanism for submitting GBV/SEA-H complaints • Occupational Health and Safety 	A full training plan shall be prepared and the training shall be delivered no later than 30 days after project effectiveness. Conducted at least on an annual basis throughout project implementation.	MOFP/PMU