

**THE SECRETARIATE OF THE SOUTHERN
AFRICAN DEVELOPMENT COMMUNITY (SADC)
Sustainable Groundwater Management in SADC
Member States Project Phase II (P176607)**

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

March 2, 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Secretariat of the Southern African Development Community (SADC) (the Borrower) will implement the Sustainable groundwater management in SADC member states Project – Phase 2 (P176607) (the Project), with the involvement of the SADC Member Countries (Sub-grant recipients), as set out in the Grant Agreement. The International Bank for Reconstruction and Development (the Bank), acting as the administrator/implementing agency/accredited entity/implementing entity/other] of Global Environmental Facility (GEF), has agreed to provide [the original] financing (P 175355) for the Project, as set out in the referred agreement(s).
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 Bank. The ESCP is a part of the Grant Agreement and the Project Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
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 Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Bank.
4. As agreed by the Bank 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 Secretariat of the Southern African Development Community and the Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Recipient H.E Elias Mpedi Magosi – SADC Executive Secretary of Secretariat of the Southern African Development Community. 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 Bank 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>	Submit quarterly reports to the Bank throughout Project implementation.	SADG-GMI
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Bank 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 Bank’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 Bank no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the Bank within a timeframe acceptable to the Bank.</p>	SADC-GMI
C	<p>SUB-GRANTEES’ MONTHLY REPORTS</p> <p>Require Sub-grant recipients to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the Sub-grant manual and submit such reports to the SADC-GMI.</p>	Submit the monthly reports to the SADC-GMI and upon request to the Bank.	Sub-grantee
D	<p>NOTIFICATIONS RELATING TO DAAB COMPLIANCE REVIEW OF CONTRACTOR COMPLIANCE WITH SEA/SH PREVENTION AND RESPONSE OBLIGATIONS</p> <p>Notify the Bank 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 Bank of: (i) the DAAB’s decision on such referral; (ii) the sub-grantee’s Notice of Dissatisfaction, if any, with such DAAB decision;</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).	SADC-GMI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	(iii) any notification received on the commencement of an emergency arbitration proceeding or full arbitration proceeding in relation to the DAAB’s 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 SADC-GMI with qualified staff and resources to support management of ESHS risks and impacts of the Project including a qualified environmental and social management specialist to support management of E&S risks. The resource will be supported by the temporary independent ESMF consultant until such time that the resource has familiarized him/herself with the project E&S requirements</p> <p>Ensure that the sub-grantees establish and maintain qualified staff and resources to support management of ESHS risks and impacts of the Project including a qualified environmental and social specialist to support management of E&S risks.</p>	<p>Hire or appoint the environmental and social specialist prior to and thereafter maintain these positions throughout Project implementation.</p> <p>Hire or appoint the environmental and social specialist prior to commencement of sub-projects and thereafter maintain these positions throughout Project implementation.</p>	SADC-GMI
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>1. Update, consult, re-disclose and implement the Environmental and Social Management Framework (ESMF) and Stakeholder Engagement Plan (SEP) that has been prepared for the SAWIC Project (P175355), in a manner acceptable to the Bank.</p> <p>2. Ensure that all subprojects are screened in accordance with the Environmental and Social Management Framework (ESMF) prepared for the Project, and that sub-project specific Environmental and Social Assessment (ESA) instruments, such as Environmental and Social Impact Assessments (ESIAs) and/or Environmental and Social Management Plans (ESMPs) relevant to the scale and impacts of the sub-project activities are prepared based on the screening process, in accordance with the ESSs, the ESMF, and World Fund Environmental, Health and Safety guidelines and other relevant Good International Industry Practice (GIIP).</p>	<p>1. Update and disclose the SEP prior to appraisal and the ESMF prior to effectiveness and thereafter maintain throughout project implementation.</p> <p>2. Ensure sub-projects are screened and sub-project specific ESA instruments are prepared prior to implementation of the specific sub-project activities and thereafter implement throughout project implementation.</p> <p>3. Identify social risks and impacts associated with land acquisition, restriction on land use and/or involuntary resettlement activities prior to undertaking the sub-project activities.</p>	SADC-GMI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>3. Where a sub-project supports land acquisition, restrictions on land use and/or involuntary resettlement activities, conduct a social, legal and institutional assessment under ESS1, in order to identify potential economic and social risks and impacts of the sub-project implementation, and appropriate measures to minimize and mitigate them, in particular those that affect poor and vulnerable group.</p> <p>4. Assist sub-grantees to obtain, when required, or ensure all permits, consents, and authorization that are applicable to each sub-project in the relevant SADC country are obtained before implementation of the sub-project.</p>	<p>4. All relevant permits in place prior to commencement with sub-project activities</p>	
1.3	<p>MANAGEMENT OF SUB-GRANTEES</p> <p>1. 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 and evaluation criteria and reporting format for sub-grantees E&S performance in the Sub-grant manual and Sub-grant agreement with the Sub-grant recipients. Thereafter ensure that the sub-grant recipients comply and cause contractors to comply with the ESHS specifications of their respective contracts.</p> <p>2. Regularly monitor compliance with the specifications of the respective sub-projects.</p>	<p>1. Submit final grant-manual for approval prior to Board approval.</p> <p>2. Monitoring of sub-projects to be implemented throughout project implementation</p>	SADC-GMI
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>1. Prepare, 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, non-discrimination and equal opportunity, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p> <p>2. Develop maintain and implement at sub-project level standalone labor management plans (LMP) or incorporate labor conditions, and occupational health and safety measures consistent with the ESMF in the sub-project specific ESMPs in line with the applicable national legislation in the relevant SADC country and ESS2, and ensure they are available to Project workers.</p>	<p>1. Finalize and adopt the LMP prior to appraisal, and thereafter implement the LMP throughout Project implementation.</p> <p>2. Develop sub-project level LMPs prior to implementation of sub-project activities</p>	<p>1. SADC-GMI</p> <p>2. Sub-grant recipient</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>1. Establish, maintain, and operate a grievance mechanism as part of the Labor Management Procedure for SADC-GMI, consistent with ESS2.</p> <p>2. Establish, maintain, and operate a grievance mechanism as part of the Labor Management Procedure at sub-project level, consistent with ESS2.</p>	<p>1. Establish grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.</p> <p>2. Adoped the grievance mechanism set out in the sub-project LMP prior to engaging sub-project workers.</p>	<p>1. SADC-GMI</p> <p>2. Sub-grant recipient</p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Make provision for the incorporation of waste management practices consistent with the waste management tool set out in the Project ESMF at sub-project level as part of the sub-project level ESMPs.</p>	<p>Adopt the WMP as part of the sub-project ESMP; prior to sub-project implementation and thereafter implement the WMP throughout Project implementation].</p>	
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>1. Incorporate resource efficiency and pollution prevention and management measures in the sub-project level ESMP to be prepared under action 1.2 above.</p> <p>2. Undertake relevant assessments and studies to determine potential impacts of water abstraction on downstream users.</p>	<p>1. Preparation of the Sub-project level ESMP prior to implementation of the specific sub-project activities and thereafter implemented throughout the sub-project implementation.</p> <p>2. Assessment or studies completed prior to implementation of sub-project activities</p>	
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from sub-project activities and include mitigation measures in the sub-project ESMPs to be prepared in accordance with the ESMF.</p>	<p>Preparation of the Sub-project level ESMP prior to implementation of the specific sub-project activities and thereafter implemented throughout the sub-project implementation</p>	
4.2	<p>SEA AND SH RISKS</p> <p>1. As part of the ESMF, prepare procedures for assessing risks of SEA/SH and develop a SEA/SH accountability and response chart</p>	<p>1. As per 1.2 (1) timeline</p> <p>2. As per 1.2 (2) timeline</p>	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>2. As part of the sub-project screening process, assess the risks of sexual exploitation and abuse (SEA) and sexual harassment (SH), where relevant, prepare, disclose, adopt and implement a sub-project SEA/SH Action Plan as part of the ESMP, to assess and manage the risks of SEA and SH.</p> <p>2.</p>		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
NOT RELEVANT			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS Sub-project site selection and screening shall identify potential biodiversity sensitivities within the sub-project area and determine whether avoidance is possible or recommend further assessment of impacts under action 1.2 and include mitigation measures in the subproject ESMP and/or project design considerations.</p>	Conclude screening and preparation of any applicable assessments or studies prior to implementation of sub-project level activities	SADC-GMI
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.2	<p>INDIGENOUS PEOPLES PLAN 1. Sub-project site selection and screening shall identify if Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities (as they may be referred to in the national context) are present in, or have collective attachment to a proposed project area and promote equitable access to benefits and to avoid and/or mitigate adverse project impacts as per the requirements of ESS7. 2. Adopt and implement an Indigenous Peoples Plan (IPP), if relevant to the sub-project consistent with ESS7.</p>	<p>1. Screen sub-projects for applicability of ESS 7 prior to implementation of the sub-project activities. 2. Adopt the IPP prior to the carrying out of any sub-project activity that requires the preparation of such IPP. Once adopted, implement the respective IPP throughout sub-project implementation.</p>	<p>1.SADC-GMI and Sub-grant recipients 2.Sub-grant recipients</p>
7.3	<p>GRIEVANCE MECHANISM If relevant, prepare, adopt, and implement the arrangements for the grievance mechanism for indigenous people, and further describe such arrangements in the respective IPPs (if the grievance mechanism is distinct from the one established under ESS10).</p>	Prepare a grievance mechanism for IPs prior to carrying out any activities that requires the preparation of an IPP	Sub-grant recipient
ESS 8: CULTURAL HERITAGE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
8.1	<p>CHANCE FINDS</p> <p>Prepare and incorporate chance finds procedures, as part of the sub-project specific ESMPs consistent with the chance finds measures included in the Project ESMF.</p>	Preparation of the Sub-project level ESMP prior to implementation of the specific sub-project activities and thereafter implemented throughout the sub-project implementation	Sub-grant recipient
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
NOT RELEVANT			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>1. Update, redisclose and adopt the project Stakeholder Engagement Plan (SEP).</p> <p>2.Prepare, adopt and implement sub-project level Stakeholder Engagement Plans (SEPs), in accordance with the requirements in the Project ESMF and consistent with the ESS10 and Project SEP. The SEP 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>	<p>1.Update and redisclose SEP prior to appraisal.</p> <p>2. Adopt the sub-project SEP prior to implementation of the sub-project activities and thereafter implement the sub-project SEP throughout sub-project implementation.</p>	<p>1.SADC-GMI</p> <p>2.Sub-grant recipient</p>
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 and as described in the SEP and Project ESMF.</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>	Establish the sub-project grievance mechanism as part of the Project and sub-project SEP prior to project implementation, and thereafter maintain and operate the mechanism throughout Project implementation.]	SADC-GMI and Sub-grant recipients
CAPACITY SUPPORT			
CS1	<p>Training topics for personnel involved in Project implementation (stakeholders, communities, project workers) will include among others:</p> <ul style="list-style-type: none"> • stakeholder mapping and engagement • specific aspects of environmental and social assessment • community health and safety. • Grievance redress mechanisms 	Training to be provided throughout the project implementation from the date of effectiveness onwards	SADC-GMI

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none">• Content of the code of conduct and workers contracts		