

The Republic of South Sudan
Ministry of Water Resources and Irrigation (MWRI)

**Regional Climate Resilience Program for Eastern
and Southern Africa (P180171) (for South Sudan
Component)**

Draft

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

December 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of South Sudan (the Recipient) will implement the South Sudan component of Regional Climate Resilience Program for Eastern and Southern Africa (P180171) (the Project), with the involvement of the Ministry of Water Resources and Irrigation (MWRI), 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 Ministry of Water Resources and Irrigation (MWRI)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.</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>MWRI / Project Implementation Unit (PIU)</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project (including conflicts triggered by 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 Gender Based Violence (GBV), sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury [specify other examples of incidents and accidents, as appropriate for the type of operation]. 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 including a root cause analysis, proposals for measures to prevent recurrence, and keep the Association informed of the ongoing implementation of the said measures or plans. The report shall provide sufficient details regarding the incident or accident, indicating immediate measures taken or planned to address it, and any information provided by any contractor and supervising entity, as appropriate.</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>	<p>MWRI / Project Implementation Unit (PIU)</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 as annexes to the reports to be submitted under action A above.</p>	<p>MWRI / Project Implementation Unit (PIU)</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE		

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>The MWRI shall establish and maintain a Project Implementation Unit (PIU). The MWRI through its PIU will be responsible for overall project implementation and will collaborate closely with other relevant Ministries and their respective Departments and Agencies. The PIU is tasked with ESHS management. It shall have qualified staff and resources to support management of ESHS risks and impacts of the Project including a Social Specialist and an Environmental Specialist. The Project shall also hire external expertise and consultancy services where necessary to manage risks in relation to Gender Based Violence (GBV) and to implement a Grievance Redress Mechanism (GRM).</p>	<p>Establish and maintain a PIU, as set out in the Financing Agreement. Hire or appoint the Social Specialist and Environmental Specialist prior to project effectiveness, and thereafter maintain these positions throughout Project implementation.</p>	<p>MWRI / Project Implementation Unit (PIU)</p>
<p>1.2 ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <ol style="list-style-type: none"> 1. Adopt and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs. 2. The ESMF will include the description of a screening process to identify the subproject activities’ potential E&S risks and determine relevant risks assessment and mitigation plans; i.e., Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs), and Resettlement Action Plans (RAPs). 3. The ESMF will further include a sub-project exclusion list, a generic ESMP for the Project, a Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) Action Plan, measures related to community health and safety, Labor Management Procedures (LMP), and Chance Find Procedures. 4. Adopt and implement a Stakeholder Engagement Plan (SEP), including Project Grievance Redress Mechanisms. 5. Adopt and implement a Resettlement Policy Framework (RPF). 6. Adopt and implement a Security Risk Assessment (SRA) and a Security Management Plan (SMP). 7. Subproject entities to adopt and implement the subproject or site-specific ESIA, ESMP, and others as may be required to mitigate identified E&S risks and impacts (as set out in the ESMF). Proposed activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project. 	<ol style="list-style-type: none"> 1. Adopt the ESMF prior to disbursement for Component 1 and 2, and thereafter implement throughout Project implementation. 2. Adopt and implement a SEP prior to effectiveness, and thereafter implement throughout Project implementation 3. Adopt the RPF prior to disbursement for Component 1 and 2, and thereafter implement throughout Project implementation 4. Adopt the SRA/SMP prior to disbursement for Component 1 and 2, and thereafter implement throughout Project implementation. 5. Adopt the ESMPs/ESIAs before launching the bidding process for the respective subproject that requires the adoption of such ESMP/ESIA. Once adopted, implement throughout Project implementation. 	<p>MWRI / Project Implementation Unit (PIU)</p>
<p>1.3 MANAGEMENT OF CONTRACTORS</p>	<p>As part of the preparation of procurement</p>	<p>MWRI / Project</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	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 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 .	documents and respective contracts. Supervise contractors throughout Project implementation.	Implementation Unit (PIU)
1.4	TECHNICAL ASSISTANCE Ensure that the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project, including, inter alia, ESIA 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.	MWRI / Project Implementation Unit (PIU)
1.5	CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING a) Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements including for the implementation of Component 4(CERC)in accordance with the ESSs. b) Adopt any environmental and social (E&S) instruments which may be required for activities under Component 4 of the Project, in accordance with the CERC Manual and, if applicable, CERC-ESMF and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.	a) The adoption of the CERC Manual in form and substance acceptable to the Association is a withdrawal condition for the Project. b) Adopt any required E&S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation.	MWRI / Project Implementation Unit (PIU) or designated authority for the CERC
1.6	EXCLUSION CRITERIA The following types of activities as ineligible for financing under the Project: <ul style="list-style-type: none"> • Activities that may cause damage to cultural heritage. • Activities that involve removal or conversion of forests and other natural resources. • Activities that may cause long term, permanent and/or irreversible (e.g. loss of major natural habitats including habitats of wildlife and fisheries) • Activities that may cause any significant loss of biodiversity. 	Throughout Project implementation	MWRI / Project Implementation Unit (PIU)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> • Activities that have a high probability of causing serious adverse effects to human health and/or the environment. • Activities that may have significant adverse social impacts and/ or may give rise to significant social conflict. • Activities that involve land use changes such as drainage of wetlands and cultivation. • Activities that may potentially affect the quality or quantity of water or a waterway shared with other nations. • Activities that may involve significant land acquisition, forced eviction and involuntary physical displacement. • Activities that would disproportionately affect the historically underserved and vulnerable groups. • Activities that may impact on known cultural heritage sites including sites that are important to local communities. • in sum activities that may cause large-scale physical disturbance on wildlife habitat; block the access to or use of water points etc. used by others; located in or adjacent to protected area, ; significant impact on cultural heritage; create encroachment and/or cause significant adverse impacts to critical natural habitats (e.g., wildlife reserves; parks or sanctuaries; protected areas; forests and forest reserves, wetlands, national parks or game reserve; any other ecologically/environmentally sensitive areas) and contravene international and regional conventions on environmental and social issues are not eligible for the project financing 		
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>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, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	<p>Adopt the LMP, as part of the ESMF, prior to disbursements for Component 1 and 2 and thereafter implement the LMP throughout Project implementation.</p>	<p>MWRI / Project Implementation Unit (PIU)</p>
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers as part of the Project GRM, and as described in the LMP and consistent with ESS2.</p>	<p>Establish Project grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.</p>	<p>MWRI / Project Implementation Unit (PIU)</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>As part of the ESMF, adopt and implement measures and procedures for assessing and managing Project-related pollution and resource efficiency consistent with ESS3. This shall include procedures to avoid impacts on community shared resources and/or adverse environmental impacts included in ESS3.</p>	Same timeframe as for the adoption and implementation of the ESMF	MWRI / Project Implementation Unit (PIU)
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMPs to be prepared under action 1.2. above.</p>	Same timeframe as for the adoption and implementation of the ESMP	MWRI / Project Implementation Unit (PIU)
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.2. above.</p>	Same timeframe as for the adoption and implementation of the ESMP].	MWRI / Project Implementation Unit (PIU) MWRI / Project Implementation Unit (PIU)
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities, including behavior of Project workers, risks of labor influx, potential conflicts over water and project benefits triggered by the project, response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.</p> <p>Adopt and implement COVID-19 prevention measures to assess and manage the risks of spread of COVID-19 as outlined in the ESMF.</p>	Same timeframe as for the adoption and implementation of the ESMPs.	MWRI / Project Implementation Unit (PIU)
4.3	<p>SEA AND SH RISKS</p> <p>Adopt and implement a GBV and SEA/SH Action Plan, as part of the ESMF to assess and manage the risks of SEA and SH. Risk mitigation shall include but not be limited to development and adherence to Code of Conduct for all employees, GBV-sensitive grievance mechanism, awareness raising of all employees and community members on</p>	Same timeframe as for the adoption and implementation of the ESMF.	MWRI / Project Implementation Unit (PIU)

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>GBV risks and mitigation measures.</p>		
<p>4.4 SECURITY MANAGEMENT</p> <p>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 part of the SRA and SMP, 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.</p>	<p>Prior to engaging security personnel and thereafter implemented throughout Project implementation.</p>	<p>MWRI / Project Implementation Unit (PIU)</p>
<p>4.5 DAM SAFETY (FOR ANNEX A, PARA. 2. ESS4)</p> <p>1. Establish and maintain an independent panel of experts (Panel), with terms of reference and composition acceptable to the Association, to, inter alia, review and advise on matters related to safety and other critical aspects of the respective dam, its appurtenant structures, the catchment area, the area surrounding the reservoir, and downstream areas, as relevant. Implement the recommendations made by the Panel, unless otherwise agreed to in writing by the Association.</p> <p>2. Engage one or more independent dam specialists]with terms of reference acceptable to the Association to, inter alia: (a) inspect and evaluate the safety status of the respective dam, its appurtenances, and its performance history; (b) review and evaluate the owner's operation and maintenance procedures; and (c) provide a written report of findings and recommendations for any remedial work or safety related measures necessary to upgrade the dam to an acceptable standard of safety.</p> <p>3. Engage experienced and competent professionals for the supervision of the design and construction of the respective dam, and require the owner of the dam to adopt and implement dam safety measures during the design, bid tendering, construction, operation, and maintenance of the [name of the dam] dam and associated works.</p> <p>4. Adopt and implement the following Dam Safety Plans: (i) a plan for construction supervision and quality assurance; (ii) an instrumentation plan; (iii) an operation and maintenance plan; and (iv) an emergency preparedness plan.</p> <p>5. Engage the Panel to carry out a safety inspection of the respective dam at intervals of not less than once every month during Project implementation, by independent experts whose terms of reference shall be acceptable to the Association.</p>	<p>Prior to commencement of works on respective dam</p>	<p>MWRI / Project Implementation Unit (PIU)</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	6. Enter into an agreement with the owner of the dam, where applicable, subject to terms and conditions acceptable to the Association, pursuant to which the owner of the dam shall be required to adopt and implement the following dam safety measures, in accordance with the ESSs: dam safety plans.		
4.6	DAM SAFETY (FOR ANNEX A, PARA. 5. ESS4) Engage qualified engineers to design dam safety measures for the respective dam, in accordance with good international industry practice, and thereafter adopt and implement such measures.	Prior to commencement of works on respective dam	MWRI / Project Implementation Unit (PIU)
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.	Adopt the RPF prior to disbursement for Component 1 and 2, and thereafter implement throughout Project implementation.].	MWRI / Project Implementation Unit (PIU)
5.2	RESETTLEMENT PLANS Prepare, adopt and implement a resettlement action plan (RAP) or livelihood plan for each activity under the Project for which the RPF requires such RAP or livelihood plan, as set out in the RPF, and consistent with ESS5. Ensure that RAPs are approved by the association and fully implemented before carrying out the associated activities.	Adopt and implement the respective RAP or livelihood plan, 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, prior to commencement of activity.	MWRI / Project Implementation Unit (PIU)
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Where significant risk and adverse impacts on biodiversity have been identified as part of the screening process, as per ESMF, adopt and implement a Biodiversity Management Plan (BMP) as part of the ESMP, where applicable in accordance with the guidelines of the ESIA prepared for the sub-project, and consistent with ESS6.	Adopt the BMP [prior to commencement of works, and thereafter implement the BMP throughout Project implementation.	MWRI / Project Implementation Unit (PIU)
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	UNDERSERVED TRADITIONAL LOCAL COMMUNITIES Given that all of South Sudan's populations can be identified as underserved traditional	Same as adoption and implementation of ESMF above	MWRI / Project Implementation Unit

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>communities, implement the Project in accordance with ESS7.</p> <p>The Project through its design, SEP and ESMF shall provide adequate, culturally appropriate forms of meaningful consultations and linguistically relevant content on the Project identification and implementation process and benefit sharing.</p>		(PIU)
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCEFINDS</p> <p>Describe and implement the chance finds procedures, as part of the [ESMF] of the Project.</p>	Same as adoption and implementation of ESMF above	MWRI / Project Implementation Unit (PIU)
ESS 9: FINANCIAL INTERMEDIARIES [This standard is not relevant for this Project]			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>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.</p>	Adopt and implement a SEP prior to effectiveness, and thereafter implement throughout Project implementation	MWRI / Project Implementation Unit (PIU)
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, as part of the SEP.</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 grievance mechanism prior to commencement of activities under Components 1 and 2 and thereafter maintain and operate the mechanism throughout Project implementation.	MWRI / Project Implementation Unit (PIU)
CAPACITY SUPPORT			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>CS1</p> <p>All capacity building and training plans shall be laid out in the ESMF. Training shall be provided to the PIU, contractors and community members to ensure that the Project is carried out in accordance with this ESCP. Trainings shall be required in accordance with results of capacity assessment, in:</p> <ul style="list-style-type: none"> • Stakeholder engagement • Subproject Environmental and Social screening, risks and impacts and mitigation measures for sub projects • Occupational and Community Health and Safety including road safety • Emergency preparedness and response • GBV/SEA/SH Risk Mitigation • GRM • Conflict Analysis and Capacity in Conflict Prevention • Implementation, monitoring and reporting of ESMPs • LMP • Resettlement action plan implementation • COVID 19 transmission, prevention, preparedness, and response <ul style="list-style-type: none"> • Gender equality and disability inclusion 	<p>Throughout Project implementation, as specified in the ESMF.</p>	<p>MWRI / Project Implementation Unit (PIU)</p>
<p>CS2</p> <p>Training for Project workers will be required on:</p> <ul style="list-style-type: none"> • Occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations. • GRM • GBV/SEA/SH measures • Emergency preparedness and response • LMP, CoCs • Conflict resolution, management and peace building 	<p>Throughout project implementation</p>	<p>MWRI / Project Implementation Unit (PIU)</p>