



**The Democratic Republic of São Tomé and
Príncipe**

**SOCIAL PROTECTION RESPONSE AND
RECOVERY TO COVID-19 (P178018)**

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

DRAFT

February, 22 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of the Democratic Republic of São Tomé and Príncipe (STP) (hereinafter the Recipient) will implement the **COVID-19 Social Protection and Response and Recovery Project (P178018)**, with the involvement of the Ministry of Labor, Solidarity, Family and Professional Training (MLSFPT), through the Directorate of Social Protection, Solidarity and Family (DPSSF) and the Fiduciary Agency for Project Administration (AFAP). The International Development Association (IDA), hereinafter the Association, has agreed to finance 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, and the timelines for each of these.
3. The Recipient will also comply with the provisions of any other environmental and social documents required under the World Bank Group's Environmental and Social Framework (ESF) and referred to in this ESCP, such as Environmental and Social Management Plans (ESMP), Sexual Exploitation and Abuse and Sexual Harassment Action Plan, Labor Management Procedure (LMP), and Stakeholder Engagement Plan (SEP) and the timeline set out in these environmental and social documents.
4. The Recipient is responsible for compliance with all ESCP requirements, even when the implementation of specific measures and actions is conducted by the Ministry, agency or unit mentioned in 1. above.
5. The implementation of material measures and actions defined in the ESCP will be monitored and reported to the Association by the Recipient as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of material measures and actions throughout the implementation of the Project.
6. As agreed by the Association 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 will agree the changes with Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of signed letters between the Association and the Government of São Tomé e Príncipe. The Recipient will promptly disclose the updated ESCP.
7. Where changes in the Project, unforeseen circumstances or Project performance result in changes in risks and impacts during Project implementation, the Recipient shall provide additional funds, if necessary, for actions and implementation measures to address such risks and impacts, which may include environmental, occupational health and safety impacts, and community health and safety impacts, such as gender-based violence (GBV) and in particular sexual exploitation and sexual abuse/harassment (SEA/SH).

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING: Implement all environmental and social requirements and instruments set forth in this ESCP and prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESH&S) performance of the Project, including but not limited to implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, and implementation of activities under the Stakeholder Engagement Plan (SEP), including the grievance and redress mechanism(s) associated with the Project, using monitoring templates specified in the ESMF and other instruments.</p>	<p>Quarterly reports, starting from the Effective Date and throughout the implementation of the Project.</p> <p>Reports to be submitted within the first 5 days after the reporting period.</p>	<p>MLSFPT / DPSSF</p> <p>AFAP E&S</p>
B	<p>INCIDENTS AND ACCIDENTS: Immediately notify the Association regarding any incident or accident related to the Project that has had or is likely to have a significant adverse effect on the environment, communities, the public or affected workers, including workplace accidents and Gender-Based Violence related incidents, including Sexual Exploitation and Abuse, Sexual Harassment (GBV/SEA/SH), in connection with the Project.</p> <p>Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it and any information provided by any third entity as appropriate. Subsequently, in accordance with the Association's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p> <p>For SEA/SH-related incidents, the survivor should be referred immediately to services following a survivor-centered protocol to be developed as part of the Grievance Mechanism (GM), which will be adapted to manage SEA/SH claims ethically and confidentially.</p> <p>For SEA/SH incidents, reports to the Bank regarding these claims must adhere to international norms and best practices regarding the management and sharing of survivor data. As such, confidentiality should be ensured for the survivor as well as the accused, with no identifying information for either provided.</p>	<p>Any incident or accident shall be notified to the Association's Task Team Leader immediately upon becoming aware of the incident or accident, and in any event no later than 48 hours after becoming aware of the incident or accident.</p> <p>MLSFPT shall prepare and submit a complete incident/accident report in form and substance satisfactory to the Association within seven (7) working days of first learning of the incident or accident.</p> <p>Maintain this systematic reporting system throughout project implementation.</p>	<p>MLSFPT / DPSSF</p> <p>AFAP E&S</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF RISKS AND SOCIAL AND ENVIRONMENTAL IMPACTS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p>ORGANIZATIONAL STRUCTURE:</p> <p>Establish and maintain an organizational structure with qualified staff and resources to support the management of E&S risks and impacts including identification, assessment, monitoring and supervision. The Borrower will recruit an Environmental and Social Specialist, who will be based at AFAP, and work in coordination with DPSSF. In addition, the DPSSF social team will be strengthened by hiring additional social technical staff, including 30 specialists at District level.</p>	<p>The Environmental and Social Specialist and the social technical staff must be recruited prior to the start of Project activities and no later than 60 days after Project effectiveness.</p> <p>The organizational structure, including the environmental and social specialist and the social technical staff, must be maintained throughout the implementation of the Project</p>	AFAP MLSFPT / DPSSF
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT AND MANAGEMENT TOOLS:</p> <p>The Recipient shall prepare, adopt, disseminate and implement a series of tools and instruments for the mitigation of Environmental and Social risks and impacts of the Project.</p> <p>The following E&S instruments have been prepared and will be finalized, consulted on, adopted and implemented in a manner consistent with the ESS and in a manner acceptable to the Association:</p> <ul style="list-style-type: none"> • Environmental and Social Management Framework (ESMF), including, Labor Management Procedure, Assessment and Action Plan for Prevention of Gender Based Violence, Sexual Exploitation and Abuse, Sexual Harassment; • Stakeholder Engagement Plan (SEP), including a Grievance and Redress Mechanism. • Screen any proposed subproject in accordance with the Environmental and Social Management Framework (ESMF) and generic project-wide ESMP prepared for the Project, and exclude any investments detrimental to the environment and livelihoods including cultural resources property (national level historical or religious objects), in a manner acceptable to the Bank/Association. 	ESMF and SEP finalized, consulted and disseminated prior to <i>Appraisal</i> and implemented throughout Project implementation.	AFAP E&S MLSFPT / DPSSF
1.3	<p>CONTINGENT EMERGENCY RESPONSE:</p> <p>In the event that an emergency occurs that leads to the activation of the Contingent Emergency Response Component (CERC) of the Project, the necessary E&S tools and measures should be developed, as necessary, prior to the implementation of emergency response activities to ensure compliance with the ESSs and in accordance with the Exclusion List and the Environmental and Social Screening Checklist that have been prepared and included in the Project's ESMF. Thereafter, comply with these AS instruments and measures throughout the implementation of CERC activities.</p>	Instruments and measures must be adopted before the beginning of the emergency response activities. The request for CERC activation must come from the implementer with prior non-objection by the Association.	AFAP E&S MLSFPT / DPSSF
ESS 2: LABOR AND WORKING CONDITIONS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	<p>LABOR MANAGEMENT PROCEDURES: The Recipient shall prepare, consult, disclose, adopt, and implement, Labor Management Procedure (LMP) for all Project workers, aligned with the requirements of the applicable São Tomé and Príncipe Labor Legislation and ESS2,</p> <p>The LMP addresses the issues identified in ESS2, including applicable requirements on non-discrimination, equal opportunity, prohibition of child labor and forced labor.</p> <p>Under the LMP, all workers involved in the project will have to sign the Code of Conduct, which includes specifications regarding sexual exploitation and abuse (SEA) and sexual harassment (SH).</p>	<p>The LMP is to be consulted, finalized and disseminated as part of the ESMF, according to the schedule in action 1.2.</p> <p>It should be implemented throughout the execution of the project.</p>	MLSFPT / DPSSF
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS: Establish, maintain, and operate a GM for labor-related complaints, based on national laws and procedures and consistent with ESS2, as described in the LMP. This GM will be consistent with ESS2 and will be prepared to address SEA/SH allegations. The GM will be disseminated to all Project workers.</p>	The GM for workers must be operational prior to worker involvement in the Project, and no later than 30 days after Project effectiveness, and will be maintained throughout Project implementation.	AFAP E&S MLSFPT / DPSSF
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES: Prepare, adopt and implement occupational health and safety (OHS) measures as defined in the ESMF, including specific measures to ensure that all Project activities minimize the spread of COVID-19 infections, as defined in the ESMF.</p> <p>In the screening of subprojects, the need for specific OHS measures will be assessed, in accordance with ESS2. If necessary, they should be integrated in a specific Environmental and Social Management Plan (ESMP) for the subproject.</p>	<p>The ESMF includes measures for preventing COVID in the workplace, which will be consulted on, finalized, and disseminated as part of the ESMF, according to the schedule in action 1.2.</p> <p>Prepare specific occupational health and safety measures for sub-projects, where required as a result of environmental and social screening. These measures will be integrated in a specific ESMP to be prepared, disseminated, consulted and adopted before the start of the subproject activities.</p> <p>The occupational health and safety (OHS) measures defined in the ESMF and specific ESMP must be implemented throughout project implementation.</p>	AFAP E&S MLSFPT / DPSSF
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY	
This standard is not currently relevant since the project activities are not expected to exceed the minimal threshold for waste, pollution and resource use issues.			
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>COMMUNITY HEALTH AND SAFETY: The ESMF integrates measures for the prevention of community health and safety risks, namely for the prevention of community contamination by COVID, during the implementation of Project activities.</p> <p>In the screening of sub-projects the need for specific community health and safety measures will be assessed, as per ESS4. If necessary, specific measures will be integrated into subproject-specific Environmental and Social Management Plans (ESMP).</p>	<p>The ESMF includes measures for community health and safety, which will be consulted on, finalized, and disseminated as part of the ESMF according to the schedule in action 1.2.</p> <p>Prepare specific community health and safety measures for sub-projects, where required as a result of environmental and social screening. These measures will be integrated in a specific ESMP to be prepared, disseminated, consulted and adopted before the start of the subproject activities.</p> <p>The measures for resource efficiency and pollution prevention and management measures defined in the specific ESMP and ESMP must be implemented throughout the implementation of the project.</p>	AFAP E&S MLSFT / DPSSF
4.2	<p>GBV AND SEA/SH RISKS: Prepare, adopt, and implement a GBV Assessment and a stand-alone GBV/SEA/SH Assessment and Action Plan (GBV AP) as part of the ESMF, to assess, manage and respond to the risks of GBV/SEA/SH.</p> <p>All Project workers will sign Codes of Conduct including SEA/SH clauses</p> <p>The Grievance Mechanism will be adapted to receive and manage Project-related SEA/SH allegations</p>	<p>The ESMF includes a Risk Assessment and Action Plan on GBV/SEA/SH to be consulted on, finalized, adopted and disseminated by the deadline specified in action 1.2.</p> <p>The GBV/SEA/SH codes of conduct, GBV Action Plan, and the adaptation of the GM for GBV/SEA/SH allegations must be in place prior to the start of Project activities and be implemented throughout Project implementation.</p>	AFAP E&S MLSFT / DPSSF
ESS 5: LAND ACQUISITION, LAND USE RESTRICTIONS, AND INVOLUNTARY RESETTLEMENT			
This standard is not relevant since activities that require land acquisition, land use restrictions, or involuntary resettlement will not be eligible			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

This standard is not currently relevant since the nature of the project does not involve physical intervention (e.g. land clearing, resource use) that could negatively affect the biodiversity or living natural resources.

ESS 7: INDIGENOUS PEOPLES/TRADITIONAL LOCAL COMMUNITIES HISTORICALLY DISADVANTAGED IN SUB-SAHARAN AFRICA

This standard is not currently relevant since no distinct social and cultural groups have been identified in the national context, according to ESS7.

ESS 8: CULTURAL HERITAGE

This standard is not relevant to the Project as no risks to Cultural Heritage were identified

ESS 9: FINANCIAL INTERMEDIARIES

There are no actions under the Project related to Financial Intermediaries, so there are no mitigation measures to be undertaken under ESS9.

ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

10.1	<p>PREPARATION AND IMPLEMENTATION OF THE STAKEHOLDER ENGAGEMENT PLAN: Prepare, consult upon, disclose and adopt a Stakeholder Engagement Plan (SEP) in line with ESS10 requirements. Any stakeholder feedback shall be reviewed and incorporated into the SEP, as appropriate. If significant changes are made to the SEP, the revised version shall be publicly disclosed.</p>	<p>SEP finalized, consulted and disclosed prior to Appraisal and implemented throughout Project implementation.</p>	<p>MLSFT / PIU</p>
10.2	<p>PROJECT GRIEVANCE MECHANISM: Prepare, adopt, maintain, and operationalize a grievance mechanism as described in the SEP.</p> <p>The GM shall include specific procedures to manage and resolve GBV/SEA/SH-related claims ethically and confidentially and contain an appropriate response protocol for such claims.</p>	<p>The Grievance Mechanism must be operational before the start of Project activities.</p>	<p>AFAP E&S</p>

CARRYING CAPACITY (TRAINING)

CS1	<p>Capacity building and training will be implemented for the Project coordination team, workers and communities covering the following topics: World Bank Group's environmental and social policy and guidelines, relevant to the Project</p> <ul style="list-style-type: none">• Environmental and Social Project Instruments (ESCP, ESMF and SEP)• Project Environmental and Social Management Plan• Labor Management Procedures• Covid-19 Prevention Procedures• GBV/SEA/SH Action Plan• Grievance Mechanism• Solid Waste Management	<p>Soon after the Project team is hired and continuously throughout Project implementation, as provided in the ESMF</p>	<p>AFAP E&S</p>
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