



**Republic of Malawi  
Ministry of Finance and Economic Affairs**

**Social Support for Resilient Livelihoods Project –  
Original Financing (P169198)  
First Additional Financing (P177813)  
and  
Second Additional Financing (P 180152)**

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

**Draft for Negotiations  
November 2022**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Malawi (the Recipient) is implementing the Social Support for Resilient Livelihoods Project (the Project), with the involvement of the following Ministries/agencies/units: Ministry of Finance and Economic Affairs, National Local Government Finance Committee (NLGFC), Ministry of Local Government, Ministry of Gender, Community Development and Social Welfare, Ministry of Labour, Ministry of Agriculture, Ministry of Natural Resources and Climate Change, Ministry of Lands, Community Savings and Investment Promotion Cooperative Union, and Local Authorities. The International Development Association (the Association) provided original financing (the OF) (P169198), a first additional financing (P177813) (the AF1), and has agreed to provide second additional financing for the Project (P180152) (the AF2), all as set out in the respective Financing Agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply to the Project, including the OF, the AF1, and the AF2.
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. This ESCP is a part of the Financing Agreements and Project Agreements for the Project, including the OF, the AF1, and for AF2. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreements.
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 National Local Government Finance Committee (NLGFC), 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 Executive Director of the NLGFC. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING:</b> Prepare and submit to the Association regular monitoring reports on the environmental, social, occupational health and safety (ESOHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&amp;S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>	<p>Ongoing quarterly reporting throughout Project implementation. Submit each report to the Association no later than 14 days after the end of each reporting period.</p>	National Local Government Finance Committee
B	<p><b>INCIDENTS AND ACCIDENTS:</b> 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 sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury, mistreatment of communities, incidents of GBV, damage to natural habitats, damage to physical cultural resources. 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 supervising entity, 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.</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>	National Local Government Finance Committee
C	<p><b>CONTRACTORS’ MONTHLY REPORTS</b> Require contractors and supervising firms to provide monthly monitoring reports on ESOHS 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>	National Local Government Finance Committee
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANISATIONAL STRUCTURE:</b> The Project Management Unit includes four (4) safeguard officers: two (2) senior staff and two (2) officers.</p> <p>In addition to the safeguard officers in the PMU, the following additional personnel shall be recruited under AF2 to facilitate both project implementation and E&amp;S activities:</p>	<p>The organizational structure, including the environment and social specialists must be maintained throughout Project implementation.</p>	National Local Government Finance Committee

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<ul style="list-style-type: none"> <li>4 District Cluster Coordinators (DCCs) shall be recruited – who will oversee planning and implementation of E&amp;S activities, as well as ensure compliance in the city and districts under their cluster.</li> <li>Project Facilitators shall also be recruited, one for each of the 28 districts under the Project according to the [FA] [Project Implementation Manual (PIM)] - and their responsibilities include to support Environmental District Officers (EDOs) and District Environmental Sub-Committees (DESC) in E&amp;S screening, preparation of tools, and monitoring of E&amp;S safeguard compliance.</li> </ul> <p>The Project shall continue to utilize existing decentralized E&amp;S capacity of Government of Malawi. Where available, the local ‘committees’ at community level shall be directly involved, including Catchment Management Committees (CMCs), Village Natural Resource Management Committees (VNRMC), Village Development Committees (VDCs, Grievance Redress Committees (GRCs), and Project implementation committees.</p>	<p>The 4 District Cluster Coordinators shall be appointed within 90 days following the Effective Date for the AF2 and maintained throughout Project implementation</p> <p>Project facilitators shall be appointed to the 28 districts and 4 cities within 90 days following the Effective Date for the AF2 and maintained throughout Project implementation</p> <p>Maintain throughout Project implementation.</p>	<p>National Local Government Finance Committee</p>
<p>1.2 ENVIRONMENTAL AND SOCIAL INSTRUMENTS:</p> <ol style="list-style-type: none"> <li>Update, disclose, consult, adopt, and implement, the Environmental and Social Management Framework (ESMF), which was prepared for the Project with the AF, in a manner consistent with the relevant ESSs and to the satisfaction of the Association. The revised document shall be disclosed in country by the Recipient as well as on the Association’s website. The updated ESMF shall include, inter alia, exclusion criteria for activities with substantial or high environmental and social risks, such as critical habitats, areas prone to high risk of natural disaster, cultural heritage and protected areas.</li> <li>Ensure that Catchment Management Committees, Foremen, Project participants, and COMSIP Savings Groups adopt and implement the subproject-specific Environmental and Social Management Plans (ESMPs) in form and content satisfactory to the Association, as set out in the ESMF.</li> <li>Review and update the Project Implementation Manual (PIM) for the Enhanced Public Works/Climate Smart Public Works Program (under sub-component 1.1 of component 1 of the project) to incorporate lessons learnt from the pilot, the AF1, and the community monitoring requirements.</li> </ol>	<ol style="list-style-type: none"> <li>Update ESMF for the Project that was prepared under the AF, disclose, consult, and adopt updated ESMF 90 days after the Effective Date for the AF2, and thereafter implement the updated ESMF throughout Project implementation, all in a manner satisfactory to the Association.</li> <li>Adopt the ESMP before carrying out the sub-project works that require the adoption of such ESMP. Once adopted, implement the respective ESMP throughout Project implementation.</li> <li>The PIM shall be updated prior to the Effective Date for the AF2</li> </ol>	<p>National Local Government Finance Committee</p> <p>National Local Government Finance Committee</p> <p>National Local Government Finance Committee</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	4. Establish the Malawi in-country Landscape Restoration Community of Practice Forum	4. Establish the Malawi in Country Landscape Restoration Community of Practice forum within 90 days of the Effective Date for the AF2	Department of Land Resources Conservation
1.3	<p><b>MANAGEMENT OF CONTRACTORS:</b>                      Incorporate the relevant aspects of the ESCP, including the relevant E&amp;S instruments, and the Labour Management Procedures, and code of conduct, into the ESOHS specifications of the procurement documents and contracts with contractors and supervising entities. Thereafter ensure that the contractors comply with the ESOHS specifications of their respective contracts.</p>	<p>Prior to the preparation of procurement documents.</p> <p>Supervise contractors throughout Project implementation.</p>	National Local Government Finance Committee
1.4	<p><b>TECHNICAL ASSISTANCE</b>                      Ensure that the consultancies, studies (including feasibility studies, if applicable), service providers, 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.</p>	Throughout Project implementation.	National Local Government Finance Committee
1.5	<p><b>CONTINGENT EMERGENCY RESPONSE FINANCING (CERC)</b>                      a) Ensure that the Contingency Emergency Response Component Manual includes a description of the ESOHS assessment and management arrangements for the implementation of the CERC in accordance with the ESSs.</p> <p>b) Adopt the Project ESMF which may be required for activities under CERC of the Project, in accordance with the Contingency Emergency Response Component Manual and, the ESSs, and thereafter implement the measures and actions required under said E&amp;S instruments, within the timeframes specified in said E&amp;S instruments.</p>	a) The adoption of the Contingency Emergency Response Component Manual, in form and substance acceptable to the Association is a withdrawal condition under Section III of Schedule 2 of the Financing Agreements.	The National Local Government Finance Committee

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		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.	
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOUR MANAGEMENT PROCEDURES:</b> Update and implement the Labour Management Procedures (LMP) that have been developed under the AF for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, emergency preparedness and response, and incident reporting), code of conduct (including relating to SEA and SH), forced labor, child labor, provisions for disabled workers, Community Workers, Community Volunteers, Contracted Workers, Short-Term Consultants and Direct Project Workers, grievance arrangements for all Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	Labor Management Procedures shall be updated by the Disbursement Date for the AF2 and implemented throughout Project implementation.	National Local Government Finance Committee
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS:</b> Maintain and operate the grievance mechanism and incident register for Project workers, as described in the LMP and consistent with ESS2.</p>	Worker grievance mechanism operational prior to engaging Project workers and maintained throughout Project implementation	National Local Government Finance Committee, Contractors.
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES:</b> 1. Implement occupational, health and safety (OHS) measures specified in the ESMF, subcomponent ESMPs, and LMP, in line with applicable WBG Environmental Health and Safety (EHS) guidelines and other relevant Good International Industry Practice (GIIP).  2. Site-specific risk assessments shall be carried out and preventative action and mitigation measures developed in the ESMPs.</p>	<p>1. OHS measures operational prior to engaging Project workers and maintained throughout Project implementation.  2. Site-specific OHS risk assessment shall be completed prior to commencement of work under the same timeframe as for the preparation and implementation of the ESMPs under action 1.2 (2) of this ESCP.</p>	National Local Government Finance Committee, Contractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	3. Identify first-aid focal persons under each micro-catchment and provide first aid training and first-aid kits that are readily accessible.	3. Identification of first aid focal persons, first aid training completed, and provision of first aid kits shall be carried out prior to commencement of works under each subproject. First Aid kits shall be maintained throughout sub-project implementation.	National Local Government Finance Committee, Contractors
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<b>WASTE MANAGEMENT PLAN:</b> Adopt and implement, as part of each subproject ESMP, a Waste Management Plan (WMP) for relevant and specific subprojects to manage hazardous and non-hazardous wastes (including disposal of inert material from excavation activities), consistent with ESS3 and other requirements included in the ESMF for the Project and use of and authorized disposal sites.	Same timeframe as for the preparation and adoption of ESMPs in 1.2 (2) above.	National Local Government Finance Committee
3.2	<b>PEST MANAGEMENT PLAN:</b> Prepare, adopt, and implement a Pest Management Framework (PMF) in the updated ESMF which includes eligibility criteria to ensure that banned substances are not being used in Project activities. In accordance with this PMF, prepare and adopt, as part of each subproject ESMP, Pest Management Plans for relevant and specific subprojects where the use of pesticides or chemicals are considered necessary.	Same timeframe as for the updating, preparation and adoption of the ESMF and mitigation measures included in the ESMPs under Section 1.2 above.	National Local Government Finance Committee
3.3	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b> In accordance with the ESMF, incorporate resource efficiency and pollution prevention and management measures in the ESMPs to be prepared under action 1.2 (2) above.	Same timeframe as that of the adoption and implementation of the ESMPs under Section 1.2 (2) above.	National Local Government Finance Committee
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>TRAFFIC AND ROAD SAFETY</b> Traffic management Plan (TMP) shall set out management and mitigation measures for traffic and road safety, taking into consideration both the disruption to traffic and the safety of workers and the community during Project implementation.  The TMP shall form part of the ESMF and shall be included in the subproject specific ESMPs.	Same timeframe as updating ESMF under Section 1.2 (1) above; Include in subproject ESMPs with same timeframe as Section 1.2 (1) above. Measures shall be implemented throughout project implementation	National Local Government Finance Committee

<p>4.2</p>	<p><b>COMMUNITY HEALTH AND SAFETY:</b></p> <ol style="list-style-type: none"> <li>1. Assess and manage specific risks and impacts to the community arising from Project activities and natural disaster risks, including, inter alia, behaviour of Project workers, worker sanitation arrangements, response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF, including eligibility criteria for exclusion of areas prone to high risk of natural disaster.</li> <li>2. Asses and manage risks of communicable diseases (including inter alia COVID 19 and Cholera), sanitation, conflicts (in accordance to the GRM) and related health and safety issues and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.</li> </ol>	<p>Same timeframe as that of the adoption and implementation of the ESMPs under Section 1.2 (2) above. Measures to be implemented throughout project implementation</p>	<p>National Local Government Finance Committee</p>
<p>4.3</p>	<p><b>GBV, SEA, AND SH RISKS:</b> Based on the assessment that was completed, prepare, adopt and implement a Gender Based Violence (GBV)/Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) Action Plan Framework (GBV/SEA/SH Action Plan Framework) to be included in the updated ESMF, to assess and manage the risks of GBV, SEA, and SH in the ESMPs.</p>	<p>Assessment was completed in July, 2022.  Prepare, adopt and implement the GBV/SEA/SH Action Plan Framework within the same timeframe for the updating of the ESMF under Section 1.2 (1) above; thereafter implement the GBV/SEA/SH Action Plan throughout Project implementation and include relevant measures in the ESMPs within the same timeframe as Section 1.2 (2) above.</p>	<p>National Local Government Finance Committee</p>



<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<p><b>RESETTLEMENT POLICY FRAMEWORK</b></p> <p>Update, disclose, consult, adopt, and implement the Resettlement Policy Framework (RPF) for the Project including inter alia procedures for voluntary land agreements and community bylaws, consistent with ESS5.</p>	Update, disclose, consult and adopt the RPF within 90 days of the Effective Date for the AF2. Implement the RPF throughout Project implementation.	National Local Government Finance Committee
5.2	<p><b>RESETTLEMENT PLANS:</b></p> <p>Adopt, and implement a resettlement action plan (RAP) for each activity under the Project for which the RPF requires such RAP, as set out in the RPF and consistent with ESS5.</p> <p>The grievance mechanism to address resettlement related complaints shall be described in the RPF and SEP. The Project GRM shall be used to address resettlement-related complaints and issues. Specific Resettlement Plans shall describe the GRM to be applied.</p>	Adopt and implement the respective RAP prior to carrying out any activity that requires resettlement , including ensuring that before taking possession of the land and related assets, full compensation has been provided and as applicable displaced people have been resettled and moving allowances have been provided, all in a manner satisfactory to the Association.	National Local Government Finance Committee
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p><b>BIODIVERSITY RISKS AND IMPACTS:</b></p> <p>Assessment of biodiversity and living natural resources risks shall be conducted in accordance with ESS6 and procedures to be specified in ESMF.</p> <p>In addition, assess and manage impacts for each subproject in accordance with measures to be adopted in the Biodiversity Management Plans and the subproject ESMPs to be prepared under action 1.2 above, consistent with ESS6.</p> <p>While sub-project sites are not yet identified, selected locations shall avoid environmentally sensitive areas, protected areas, and critical habitat areas.</p> <p>The ESMF shall also include eligibility criteria for sub-projects to ensure avoidance of invasive species in forest restoration activities.</p>	Same timeframe as that for the adoption and implementation of the ESMF and ESMPs under Section 1.2 above.	National Local Government Finance Committee
6.2	<p><b>WORK IN PROTECTED AREAS</b></p> <p>Where applicable, comply with national legislation and secure necessary permits and/or written consent from relevant government entities. Conditions of the permits and/or consents must be included in the relevant ESMPs.</p>	Same timeframe as that for the adoption and implementation of the subproject ESMPs.	National Local Government Finance Committee
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
This standard is not applicable in the context of Malawi as such groups are not present.			
<b>ESS 8: CULTURAL HERITAGE</b>			

8.1	<p><b>CHANCE FINDS:</b> Prepare a template, and describe and implement the chance finds procedure as part of the ESMF developed for the Project. Screening of sub-project sites and necessary measures for each sub-project shall be covered under the ESMF and ESMP to be prepared under action 1.2 above.</p>	Same timeframe as that for the adoption and implementation of the ESMF and ESMPs under Section 1.2 above.	National Local Government Finance Committee
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION:</b> Update, adopt, and implement the updated Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS 10, 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>	SEP was updated in October 2022 and will be disclosed in November 2022. Implementation of the measures contained in the updated SEP shall continue throughout the Project implementation.	National Local Government Finance Committee
10.2	<p>Update, adopt, maintain, and operate the updated 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.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of GVB/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. GRM should also be accessible to report environmental concerns resulting to/from the Project.</p> <p>Undertake regular review of functionality of the GRM committees and provide regular mentorship</p> <p>Adopt, maintain and operate a grievance register, as described in the SEP, to record the types of grievances and the redress and/or mitigation measures implemented.</p>	<p>GRM is already operational. It shall be updated to cover additional financing activities no later than 3 months from the Effective Date of the AF2, and thereafter be maintained and implemented throughout Project implementation.</p> <p>Throughout Project implementation – monthly for internal monitoring and reporting, and quarterly for external reporting.</p> <p>Grievance register has been adopted and shall be maintained and updated continuously as and when grievances are reported throughout Project implementation</p>	National Local Government Finance Committee
<b>CAPACITY SUPPORT</b>			

CS1	<p>Carry out capacity needs assessment on E&amp;S across all levels.                  Prepare and implement capacity building plan:</p> <ul style="list-style-type: none"> <li>• to strengthen stakeholder capacity in coordinating, planning, implementing and monitoring environmental and social risk identification, management and mitigation issues;</li> <li>• To strengthen capacity in implementing soil and water conservation techniques, sediment trapping, and runoff management, reforestation and natural regeneration.</li> <li>• To strengthen capacity in GEMS reporting and capturing and reporting subproject information.</li> </ul>	<p>Carry out capacity building assessment and prepare capacity building plan within 4 months from the Effective Date of the AF2.</p> <p>Implement capacity building plan throughout Project implementation in accordance with the schedule set forth in the plan.</p>	National Local Government Finance Committee
CS2	<p>Training for Project workers on EPWP, traffic management and road safety, and livelihoods support sub-projects on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.</p>	<p>Prior to commencement of sub-project activities</p>	National Local Government Finance Committee