

Republic of Botswana

**Renewable Energy Support and Access Project
(P181221)**

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

May 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Botswana (the Borrower) will implement the Renewable Energy Support and Access Project (P181221) (the Project), with the involvement of the Botswana Power Corporation (BPC), as set out in the Loan Agreement, GCF Financing Agreement and Project Agreements. The International Bank for Reconstruction and Development (the Bank), in its own capacity and acting as the administrator of the Green Climate Fund, has agreed to provide financing for the Project, as set out in the referred agreements.
2. The Borrower 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 Loan Agreement GCF Financing Agreement and Project Agreements. 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 Borrower 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 Borrower, 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 Borrower through the Project Implementing Unit and the Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the BPC Project Manager. The Borrower 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 mechanisms.</p>	<p>Submit quarterly reports to the Bank throughout Project implementation, commencing after the Effective Date. Submit each report to the Bank no later than 7 days after the end of each reporting period.</p>	PIU
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>	PIU
C	<p>CONTRACTORS’ MONTHLY REPORTS</p> <p>Require contractors and supervising firms (owners engineer) to provide monthly monitoring reports on Environmental, Social, Health and Safety (ESHS) performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Bank.</p>	<p>Submit the monthly contractors reports to the Bank upon request as annexes to the reports to be submitted under action A above.</p>	PIU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>1.1 ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain a Project Implementing Unit (PIU) within the BPC that is tasked with ESHS management, with qualified staff and resources to support management of ESHS risks and impacts of the Project including a health and safety specialist, an environmental specialist and a social specialist</p>	<p>Establish and maintain a PIU as set out in the Loan Agreement. Hire or appoint a health and safety specialist, an environmental specialist and a social specialist within three (3) months after project Effectiveness, and thereafter maintain these positions throughout Project implementation.</p>	<p>PIU</p>
<p>1.2 ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>1. Adopt, and implement the Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p> <p>2.</p> <p>3., Adopt, and implement an abbreviated Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for the BESS activities under Component 1, proportionate to the level of risk and consistent with the ESSs.</p> <p>4. adopt, and implement Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for the transmission and distribution network including substation construction and expansion under Component 2 of the Project, proportionate to the level of risk and consistent with the ESSs.</p> <p>4. Adopt and implement the site-specific Environmental and Social Impact Assessment (ESIA)] and Environmental and Social Management Plan (ESMP), as set out in the ESMF. The proposed activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</p>	<p>1. Adopt the ESMF by Appraisal and thereafter implement the ESMF throughout Project implementation.</p> <p>2. Adopt the ESIA and ESMP before launching of bidding process for the corresponding works, and thereafter implement the ESIA and ESMP throughout Project implementation.</p> <p>3. adopt the ESIA and ESMP before launching of bidding process for the corresponding works, and thereafter implement the ESIA and ESMP throughout Project implementation.</p> <p>4. Adopt the ESIA and ESMP before launching the bidding process for the respective subproject prior to the carrying out of the subproject activity that requires the adoption of such ESIA and ESMPs. Once adopted, implement the respective ESIA and ESMP throughout Project implementation</p>	<p>PIU</p>
<p>1.3 MANAGEMENT OF CONTRACTORS</p>		<p>PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the ESMP, Labor Management Procedures, project specific occupational health and safety requirements and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms (owners engineer). Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.	As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation.	
1.4	TECHNICAL ASSISTANCE Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.	Throughout Project implementation.	PIU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Adopt and implement the Labor Management Procedures (LMP), as part of ESMF, 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.	Adopt the LMP as part of the ESMF by Appraisal, and thereafter implement the LMP throughout Project implementation.	PIU
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Establish grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.	PIU
2.3	OCCUPATIONAL HEALTH AND SAFETY (OHS) Prepare, adopt and implement a standalone OHS management plan to document, identify and mitigate OHS hazards and risks, record and manage OHS incidents, emergency preparedness and response procedures and creating awareness on OHS topics to project employees and contractors, consistent with ESS2 and international best practices or standards (i.e ISO45001) and to the satisfaction of the Bank.	Prior to commencing with physical activities and thereafter implement and maintain the procedures throughout the project lifecycle.	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.4	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS)</p> <p>Require the contractor to prepare a standalone OHS Management Plan prior to commencing with the works.</p>	Prior to commencing with physical activities and thereafter implement and maintain the procedures throughout the project lifecycle.	PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>1., Adopt and implement a Waste Electrical and Electronic Equipment Management Plan” (WEEEP), , as part of the ESIA/ESMP for the BESS activities consistent with ESS3.</p> <p>2. Include product specifications and “cradle to grave” provisions in the contracts of supplier for batteries used in the BESS in accordance with International best practice.</p> <p>3. Adopt and implement a Waste Management Plan (WMP) for non-hazardous and hazardous waste generation, consistent with EES3 and the WB EHSs, during construction as part of the site specific ESMP for the transmission and distribution network including substation construction and expansion under Component prepared under action 1.2(3).</p>	<p>1. Adopt the WEEEP within the timeframe stipulated in action 1.2(2) for the preparation of the BESS ESIA and ESMP and thereafter implement the WEEEP throughout Project implementation.</p> <p>2. As part of the procurement documents prepared prior to launching of the bidding process for the supply of the batteries.</p> <p>3. Prepare and adopt the WMP within the timeframe stipulated in action 1.2(3) for transmission and distribution network including substation construction and expansion ESIA and ESMP and thereafter implement the WMP throughout Project implementation.</p>	PIU
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under actions 1.2(2) and 1.2(3) above.</p>	Same timeframe as for the adoption and implementation of the ESMPs under actions 1.2(2) and 1.2(3).	PIU
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 Project activities, including, inter alia, behavior of Project workers, risks of labor influx, response to emergency situations, and include mitigation measures in the ESMPs, including measures for prevention of GBV/SEA/SH, to be prepared in accordance with the ESMF.</p>	Same timeframe as for the adoption and implementation of the ESMP.	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT PLANS Adopt and implement a resettlement action plan (RAP) for activities under Component 2 of the Project, consistent with ESS5.	Adopt and implement the respective RAP, prior to : taking possession of the land; commencement of any civil works,	PIU
5.2	GRIEVANCE MECHANISM 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 ESS5.	Establish, as part of procedures outlined in SEP, the grievance redress mechanism prior to Appraisal, and thereafter maintain and operate the mechanism throughout Project implementation.	PIU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Screen subproject activities for biodiversity sensitivities as set out in the ESMF and undertake the studies and propose mitigation measures consistent with ESS6, as relevant, as part of the ESMPs to be prepared under actions 1.2(2) and 1.2(3),	Adopt and implement mitigation measures in the ESMPs within the timeframes stipulated under actions 1.2(2) and 1.2(3)	PIU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES Not Applicable			
Not relevant			
ESS 8: CULTURAL HERITAGE			
8.2	CHANCE FINDS Describe, implement and adopt the chance finds procedures, contained in the ESMF of the Project.	Describe the chance find procedures in the ESMF. Implement the procedures throughout Project implementation.	PIU
ESS 9: FINANCIAL INTERMEDIARIES			
Not relevant			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION 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.	Adopt the SEP prior to Appraisal and thereafter implement the SEP throughout Project implementation.	PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
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.</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>	<p>Establish, as part of procedures outlined in SEP, the grievance redress mechanism prior to Appraisal, and thereafter maintain and operate the mechanism throughout Project implementation.</p>	<p>PIU</p>
CAPACITY SUPPORT			
CS1	<p>Training and capacity building initiatives for the Project shall incorporate as a minimum the following Environmental and Social aspect:</p> <p>For the PIU staff:</p> <ul style="list-style-type: none"> • Training on Environmental and Social Standards applicable to the project. • Stakeholder engagement including community engagement and mapping. • Grievance Redress Mechanism. • Environmental and social aspects of the project including OHS and incident reporting requirements. • Project supervision, monitoring and reporting. • GBV, SEA/SH aspects. • Labour Management. • Climate Change and Climate Resilience Mainstreaming in Environmental Management. <p>For the Contractor:</p> <ul style="list-style-type: none"> • Occupational Health and Safety including aspects of hazards and risks, emergency preparedness and response measures and incident reporting and investigation. • Grievance Redress Mechanism for workers. 	<p>Commencing at the start of the project and continuing throughout project implementation.</p>	<p>BPC/PIU</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none"> • Key environmental and social risks and impacts of works. • Community health and safety aspects including GBV, SEA/SH, traffic safety etc. • Labour management. 		