

The Republic of Liberia

Ministry of Education

Liberia Learning Foundation Project (P172705)

Draft

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

May 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The **Government of Liberia (GoL)** will implement the **Liberia Learning Foundation Project, with the involvement of** the Ministry of Education (**MoE**) through the Project Delivery Team (**PDT**). The International Development Association (hereafter the Association) has agreed to provide financing for the project.
2. The GoL 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, as well as the timing for each of these.
3. The GoL will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Management Plans (ESMP), Resettlement Action Plan (RAP), and Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S documents.
4. GoL is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministries, agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by the GoL as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and the GoL, 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, GoL will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the GoL. The Government of Liberia will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the GoL shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include relevant to the project such as *environmental, health, and safety impacts, labor influx, child labor, people with disability, gender-based violence*.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING: <i>The Project will prepare and submit regular reports on the performance of the Project and its compliance with all E&S requirements in form and substance acceptable to the Bank, providing details of: (i) status of implementation of the ESCP; (ii) conditions, if any, which interfere or threaten to interfere with the implementation of the ESCP; and (iii) corrective and preventive measures taken or required to be taken to address such conditions.</i></p>	<p><i>Quarterly throughout the project implementation phase.</i></p>	MoE/PDT
B	<p>INCIDENTS AND ACCIDENTS: <i>The Project will promptly notify the Bank of any incident or accident related to the Project implementation which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers including situations of fatalities or serious bodily harm and incidents of Gender Based Violence.</i></p> <p><i>The Project will 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 contractor and supervising entity, as appropriate. Subsequently, as per the Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</i></p>	<p><i>Notify the Bank within 48 hours after the PDT becomes aware of the incident or accident. A subsequent detailed report would be provided within a timeframe acceptable to the Bank, as requested.</i></p>	MoE/PDT
C	<p>CONTRACTORS MONTHLY REPORTS: <i>The Project will require contractors to submit monthly reports to the MoE on the level of compliance with ESS requirements particularly for civil works. This report will ensure that contractors provide details on their oversight on environmental, social, health and safety (ESHS) performance as enshrined in the ESMF, ESMP, SEP and LMP.</i></p> <p><i>These reports will be generated from the field by construction site supervisors recruited under the Project and submitted through the Procurement/Contract Management Specialist of the PDT to the MoE for onward reporting to the Bank.</i></p>	<p><i>From the commencement of construction works throughout project implementation.</i></p>	MoE/PDT
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.1 ORGANIZATIONAL STRUCTURE: <i>The MoE has its Division of Physical Environment as the office responsible for environmental safeguards on civil works. The Project will engage the services of this Division to appoint/recruit qualified dedicated staff to support management of E&S risks and impacts. The MoE will include social development specialist / focal persons from the Divisions of Girls Education and Inclusive Education. The Social Development Officers will handle the social safeguards and other social issues related to GBV risks management and disability inclusion. The M&E Specialist of the PDT shall be designated and empowered to monitor and report on overall management of E&S risks in line with the environmental and social safeguard requirements. Together, the safeguards team will form part of the project management team reporting directly to the Project Coordinator, LLF.</i></p> <p>The MoE to appoint or recruit one dedicated Environmental Specialist and one Social Safeguard Specialist with specialized skills in GBV risks management</p> <p><i>The team through the M&E Specialist will provide periodic updates on compliance with E&S throughout the project implementation. The team will constitute the organization structure that will have oversight on compliance with the E&S documents.</i></p>	<p><i>Safeguard team will be constituted within 60days of the Project effectiveness and continue to exist throughout implementation.</i></p>	MoE/PDT	
	<p>Within 60days of the Project effectiveness</p>	MoE/PDT	
	<p>Throughout project implementation</p>	MoE/PDT	
<p>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT <i>The MoE is required to develop and disclose ESMF (including COVID-19 provisions) and RPF prior to appraisal.</i></p> <p>Conduct A Rapid Social Impact Assessment in the 54-participating school</p>	<p><i>ESMF and RPF to be disclosed by June 3, 2020</i></p> <p>Start 30 days from project effectiveness date</p>	<p>MoE/ PDT</p> <p>MoE/PDT (Social Specialist)</p>	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS: <i>The Project will also fund the preparation of ESMPs for sub-projects in line with ESMF, satisfying the requirements of the Environmental Protection Management Law (EPML) of Liberia.</i></p> <p>Preparation and disclosure of ARAP / RAP in line with RPF, as and when required.</p>	<p><i>ESMPs to be prepared and disclosed for sub-projects prior to commencement of Civil Works at Project site (s).</i></p> <p><i>ARAP/RAP prepared and implemented, if required, prior to the commencement of civil works.</i></p>	<p>MoE/MCA TWT & PDT</p> <p>MoE/PDT</p>
1.4	<p>PERMIT, CONSENTS AND AUTHORIZATIONS: <i>The Project will seek and obtain the necessary approvals, permits and authorizations from the Environmental Protection Agency (EPA) and other relevant national authorities as applicable.</i></p> <p><i>The project will Comply or cause to comply, as appropriate, with the conditions established in these permits, consents and authorizations throughout Project implementation.</i></p>	<p><i>Before initiating activities that require permits, consents and authorizations.</i></p>	<p>MoE/PDT</p>
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES: The MoE is required to develop and implement a Labor Management Procedure (LMP). The LMP (including COVID-19 provisions) will be developed in consonance with ESS2 and the Liberia national labor laws including the Decent Work Act (2015) and Standing Order of the Civil Service (2012) to guide working conditions as mitigation measures of labor related risks for the Project. <i>The MoE will be required to develop and disclose the Labor Management Procedure (LMP) and comply with the LMP, and ensure that all contractors for civil works are also in full compliance with all provisions of the LMP.</i></p>	<p><i>LMP to be developed and disclosed by June 3, 2020 and implemented throughout project implementation phase.</i></p>	<p>MoE/GoL</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS: <i>A grievance redress mechanism for the Project to be developed, maintained, and operated throughout project implementation. The project will ensure its contractors develop and implement a specific GRM for their staff in line with the LMP, SEP and ESMF to address worker grievance, and this shall be approved by the MoE and the Association.</i></p> <p><i>Create and operationalize GRM</i></p>	<p><i>A GRM for the Project to be developed, maintained, and operated throughout project implementation.</i></p> <p><i>A functional GRM within 10 days of deployment of contractor/consultant on site.</i></p>	MoE/PDT/Contractor
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY MEASURES: <i>The project will require contractors to prepare and implement site specific OHS plan as necessary.</i></p> <p><i>The OHS measures designed will be followed throughout project implementation. It will address: (a) identification of potential hazards to project workers, particularly those that may be life-threatening; (b) provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances; (c) training of project workers and maintenance of training records; (d) documentation and reporting of occupational accidents, diseases and incidents; emergency prevention and preparedness and response arrangements to emergency situations; and (f) remedies for adverse impacts such as occupational injuries, deaths, disability and disease. It will also address COVID-19 provisions.</i></p>	<p><i>Prior to the commencement of civil work and implemented throughout the civil works.</i></p>	MoE/PDT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.4	<p>PROJECT WORKERS TRAINING: <i>The Project will implement training of Project workers designed to heighten awareness of risks and to mitigate impacts on local communities.</i></p> <p><i>The project will ensure that contractors, subcontractors and their workers are trained and are aware of risks and to mitigate impacts on local communities. The PDT/MOE shall develop a training manual indicating staffs and training schedule</i></p>	<p><i>Training manual within 60 days of project effectiveness and training/ regular refresher throughout project implementation.</i></p> <p><i>Prior commencing work or employment</i></p>	MoE/PDT/Contractor
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	E-WASTE MANAGEMENT PLAN	<i>Not applicable</i>	
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Most of the wastes from the project activities will be generated during the civil works activities. This will be mainly construction related wastes that can be easily managed. The use of water for construction purpose may also create some challenge for people living in proximity of construction sites. The PDT/Contractor would assess the use of water resource for local community, pollution and waste generation and develop ESMP to provide measures to manage / prevent pollution and manage resource use and waste generated during project construction and implementation.</p>	<i>Measure to resource use efficiency, prevent pollution and manage construction related wastes to be included in the ESMP prior to the commencement of civil works.</i>	MoE/PDT
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY: <i>The Project will ensure that all contractors as part of their site-specific ESMPs have traffic and road safety measures.</i></p>	<i>Prior to civil works and throughout the constructions period.</i>	MoE/PDT/Contractor

<p>4.2</p>	<p>COMMUNITY HEALTH AND SAFETY:</p> <p>a.) <i>The Project will develop COVID-19 response plan and protocol for each project site.</i></p> <p>b.) <i>The Project will also conduct training for potential contractors, sub-contractors, school administrators, elders, community leaders, community members, children and pupils to ensure orientation in community health and safety.</i></p> <p>c.) <i>Other safety measures required of contractors to barricade off construction sites.</i></p> <p>d.) Develop list of groundwater users' communities within the proximity of the 18 construction sites</p>	<p>Develop COVID-19 response plan & protocol before deployment of contractor and maintained throughout implementation</p> <p><i>Prior to commencement of civil works and maintained throughout implementation for b & c,</i></p> <p>.</p> <p>Start 30 days from project effectiveness date</p>	<p>MoE/PDT/Contractor</p>
<p>4.3</p>	<p>SEXUAL AND GENDER-BASED VIOLENCE AND EXPLOITATION RISKS: The MOE is required to develop GBV risks assessment for the project and disclose</p> <p><i>The Project will assess site specific SGBV risk using tool for GBV risks assessment as part of ESMP, if required, a GBV risks assessment shall be conducted and an action plan for risks management/ mitigation plan shall be developed, if necessary. The project will ensure that contractors and subcontractors bidding documents provide requirements for SGBV risks mitigation including signing of Code of Conduct for employees / workers/laborers.</i></p>	<p><i>Disclosed before June 03</i></p> <p><i>GBV risks assessment and action plan will be included in the ESMP for implementation and must be completed at the same time or before ESMP finalized</i></p>	<p>MoE/PDT/Contractor</p>
<p>4.4</p>	<p>SECURITY PERSONNEL</p>	<p>N/A</p>	<p>N/A</p>

<p>4.5</p>	<p>TRAINING FOR THE COMMUNITY: <i>The Project will conduct training for communities and project affected stakeholders to create awareness of risks and to mitigate impacts.</i></p> <p><i>The training will aim at building the capacity and commitment of communities to support programs targeted at sexual and gender-based violence prevention, child rights, HIV-AIDS/STI awareness and prevention, community grievance redress mechanism etc.</i></p>	<p><i>Post project lunch throughout implementation</i></p>	<p>MoE/PDT</p>
<p>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</p>			
<p>5.1</p>	<p>LAND ACQUISITION AND RESETTLEMENT: <i>The proposed construction of 54 ECE classrooms, 18 latrines, 18 water system will be constructed within the existing school premises thereby causing no need for land acquisition, restriction of land use and involuntary resettlement. However, in case construction of these structures at specific school locations may require some additional land to fit in the structure as per the design, usability or other requirements, to guide preparation of Abbreviated Resettlement Action Plan (ARAP)/ Resettlement Action Plan (RAP) as and when required, a Resettlement Policy Frameworks (RPF) is being prepared.</i></p> <p>Conduct impacted project screening and commence preparation of RAP(s)</p>	<p><i>RPF will be disclosed by June 3, 2020 prior to appraisal.</i></p> <p>Start 30 days from project effectiveness date</p>	<p>MOE/PDT</p> <p>MOE/PDT</p>
<p>5.2</p>	<p>RESETTLEMENT PLANS: <i>The Project will prepare ARAPs/RAPs when it is established that any of the schools identified for the ECE classrooms construction needs additional land/restrict land use of existing owners/users.</i></p> <p><i>The Project will ensure monitoring and reporting on such land acquisition and resettlement activities throughout Project implementation as part of regular reporting.</i></p>	<p><i>The ARAPs/RAPs will be prepared and implemented three months prior to initiating any activities related to construction on the site/embarking on civil works.</i></p> <p><i>Monitoring and reporting on RAPs will be part of project regular quarterly reports throughout implementation.</i></p>	<p>MoE/PDT</p>
<p>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</p>			

<p><i>No impacts are expected related to biodiversity conservation and sustainable management of living natural resources under the Liberia Learning Foundation Project, therefore there are no mitigation measures to be undertaken under ESS6 for the Project.</i></p>			
<p>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</p>			
<p><i>No people/group of people identified as Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the project area of the Liberia Learning Foundation Project, therefore no mitigation measures to be undertaken under ESS7 for the Project.</i></p>			
<p>ESS 8: CULTURAL HERITAGE</p>			
8.1	<p>CHANCE FINDS <i>Chance Find Procedure has been incorporated in the ESMF. This will also be incorporated in the ESMP and implemented during civil works activities.</i></p>	<p><i>Chance Find Procedure as part of the project ESMF to be disclosed prior to appraisal by June 3, 2020</i></p>	<p>MoE/PDT</p>
<p>ESS 9: FINANCIAL INTERMEDIARIES</p>			
<p><i>The project does not consider involving Financial Intermediaries, therefore no mitigation measures to be undertaken under ESS9 for the Liberia Learning Foundation Project.</i></p>			
<p>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</p>			
10.1	<p>STAKEHOLDERS ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION: <i>Preparation, Disclosure & Implementation of Stakeholder Engagement Plan (SEP). The Project has engaged several stakeholders at the project design, planning and will further engage with the stakeholders during implementation stage through to project closure.</i></p>	<p><i>SEP prepared will be disclosed prior to appraisal by June 03, 2020 and updated regularly throughout Project implementation.</i></p>	<p>MoE/MCA TWT & PDT</p>
10.3	<p>THE PROJECT GRIEVANCE MECHANISM: <i>The Project will create and establish functional GRM constituting GRC after providing training and facilitating required input to every member of the GRC under the ESMF, RPF, LMP and SEP, if required for RAP/ARAP and update same when required throughout implementation.</i></p>	<p><i>within 30 days of project effectiveness and continue throughout the project implementation</i></p>	<p>MoE/PDT</p>
<p>CAPACITY SUPPORT (TRANINING)</p>			

<p>CS1</p>	<p><i>Identify capacity gaps within the PDT, implementing divisions within the MoE, contractors and site supervisors. Develop a Training Manual targeting these groups based on capacity needs identified, as well as orientation workshops for all project staffs on the following topics:</i></p> <ul style="list-style-type: none"> • <i>Objectives, scope, and requirements of all relevant Environmental & Social Standards</i> • <i>Stakeholder identification, analysis and engagement</i> • <i>Labor management procedures</i> • <i>GBV & SEA Risks & Risks mitigation procedures</i> • <i>Community health and safety</i> • <i>E& S risk management</i> <p><i>The manual has to specify training for Project workers on occupational health and safety (OHS) including on emergency prevention and preparedness and response arrangements to emergency situations. Training materials and contents should be consistent with WB ESF requirements and GIIP.</i></p>	<p><i>A training Manual shall be prepared within two months of project effectiveness to cover all identified staffs and their need and at least one training at six months must be given.</i></p>	<p><i>MoE/PDT</i></p>
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