



PRESIDENCE

Programme de Réformes pour l'Efficacité de l'Administration

(PREA)

Coordination Générale

(CG)

**Republic of Madagascar
Madagascar Digital Governance and Identity
Management Project – P169413**

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

Draft for Negotiations

August, 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Madagascar (the **Recipient**) will implement the PRODIGY Project (the **Project**), with the involvement of the following Ministries/agencies/units: the Program for Reform of the Efficiency of the Administration (PREA), the Ministry of Interior and Decentralization and the Ministry of Telecommunication. The International Development Association (hereafter the Association) has agreed to provide financing for the Project.
2. The Recipient will implement material measures and actions so that the Project is implemented in accordance with the World Bank 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 Recipient will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as the Stakeholder Engagement Plans (SEP), the Electrical and Electronic Waste Management Plan (EEWMP), the Labor Management Procedures (LMP), and the grievance mechanisms (GM) for the workers and the project, and the timelines specified in those E&S documents.
4. The Recipient is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, 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 Recipient 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 Recipient through the head of COS-PREA, 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 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 Recipient. The Recipient 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 Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include:
 - risks linked to the mobilization of consultants, civil servants and other entrepreneurs by the project: moral, sexual harassment and intimidation among employees; GBV, sexual abuse, abuse of power;
 - the risks associated with the introduction of digital governance: risk on the confidentiality of personal data collected, public incomprehension in the face of the proliferation of these new management tools, digital divide between the various segments of society: rural and urban areas , and between populations with access to the Internet and those who do not, between citizens, especially vulnerable groups;
 - Risks associated with the acquisition of IT equipment: end-of-life IT equipment, management of empty ink cartridges, risk on the physical component: soil pollution - water contamination - air pollution; biological component: fauna and flora; human health

8. The table below presents the important measures and actions required, the responsibilities of the actors involved in the Project, and the deadlines for implementing the selected measures and actions.



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING:</p> <p>Prepare and submit to the Association regular monitoring reports on the state of compliance with the actions set out in the ESCP and, particularly, in relation to the implementation of (i) Electrical and Electronic Waste Management Plan (EEWMP), (ii) environmental, social, health and safety (ESHS) performance of the Project, (iii) status of preparation and implementation of SEP, (iv) implementation of LMP (v), functioning of the grievance mechanism(s), (vi) implementation of the GBV action plan.</p>	<p><i>Bi-annual report after Project effectiveness date and maintained throughout Project implementation</i></p>	<p>Responsible Entity: Project Implementation Unit (PIU) of PRODIGY</p> <p>Responsible: PIU Coordinator in collaboration with Environmental and Social Specialist of the PIU</p>
B	<p>INCIDENTS AND ACCIDENTS:</p> <p>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 without limitation any allegations of gender-based violence and/or sexual exploitation, abuse and harassment (GBV/SEAH). Project-related occupational accidents or fatalities, or labor strikes and social unrest.</p> <p>Provide enough 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 while ensuring confidentiality especially for GBV/SEAH related incidents. Subsequently, as per the Association’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p><i>Notify the Association within 48 hours after learning of the incident or accident</i></p> <p><i>Any incident report should be sent promptly, within a timeframe acceptable and agreed upon with the Association, as requested.</i></p>	<p>Responsible Entity: PIU</p> <p>Responsible: PIU Coordinator</p>
C	<p>CONTRACTORS MONTHLY REPORTS:</p> <p>In case contractors and sub-contractors are hired for the Project activities or sub-activities, the PIU will require such contactors/sub-contractors to submit monthly monitoring reports to the PIU regarding OHS performance of the contracted work. Such monthly monitoring reports would be submitted to the Association by the Recipient upon request.</p>	<p><i>Contractor monthly reports submitted to the Association upon request.</i></p>	<p>Responsible Entity: PIU</p> <p>Responsible: PIU Coordinator in collaboration with Environmental and Social Specialist of the PIU</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1.	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain an organizational structure, the PIU, with qualified staff and resources to support management of E&S risks including an Environmental & Social Safeguard Specialist and a Gender & Communication Specialist, both with qualifications and experience acceptable to the Association.</p>	<p><i>The PIU is already in place.</i></p> <p><i>The PIU has already hired an Environmental & Social Specialist.</i></p> <p><i>The gender and communication specialist will be in place 2 months after Project effectiveness.</i></p> <p><i>The organizational structure, including the specialists, will be maintained throughout Project implementation.</i></p>	<p>Responsible Entity: PIU</p> <p>Responsible: PIU Coordinator</p>
1.2.	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>NOT RELEVANT AT THIS TIME</p>		
1.3.	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>Develop, update, adopt, and implement the Environmental and Social risk management tools, including but not limited to the following:</p> <ul style="list-style-type: none"> ○ the SEP, ○ the Communication plan, ○ the LMP, ○ the Project Grievance Mechanism, ○ the GBV Action Plan, ○ the GBV Grievance Mechanism, ○ and the EEWMP <p>As and when needed, a screening for specific risks will be carried out, and the Recipient will prepare, consult upon, adopt, disclose, and implement the environmental and social documents required for the Project, in a manner acceptable to the Association and in line with the ESSs.</p>	<p><i>SEP, LMP and EEWMP have been submitted to the Association and approved prior to Project appraisal, and disclosed both on the PREA and PRODIGY websites on June 16, and on World Bank website on June 17, 2020.</i></p> <p><i>The GRM is already included in the LMP and the SEP.</i></p> <p><i>The GBV action plan will be submitted to the Association for approval no later than 60 days after Project effectiveness.</i></p> <p><i>Any update of SEP and LMP, final communication plan, EEWMP, GRM to be submitted to the Association for approval prior to implementation.</i></p> <p><i>Once approved, the instruments are maintained and implemented throughout Project implementation.</i></p>	<p>Responsible Entity: PIU</p> <p>Responsible: PIU Coordinator / Environment & Social Specialist / Gender and communication specialist</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>In case contractors and sub-contractors are hired for the Project activities or sub-activities, the PIU will incorporate the relevant aspects of the ESCP, including the relevant environment and social documents and/or plans, such as the ESMP and the Labor Management Procedures, into the occupational health and safety (OHS) specifications of the procurement documents with contractors.</p> <p>Thereafter, the PIU will ensure that the contractors comply with the OHS specifications of their respective contracts.</p>	<p><i>Prior to the preparation of procurement documents.</i></p> <p><i>Supervise contractors throughout Project implementation.</i></p>	<p>Responsibility: PIU Environment & Social Specialist Accountability: PIU Coordinator</p>
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>(i) The LMP (which include Code of conduct) has been prepared, approved by the Association and disclosed both in-country and in the Association web site prior to Project appraisal. Thereafter, update, adopt, and Implement the Labor Management Procedures (LMP) that have been developed for the Project, in line with ESS2.</p> <p>(ii) Codes of Conduct including clauses and sanctions against the use of GBV/SEAH will be required for all contractors and subcontractors and their workers. All staff will be required to attend information and awareness sessions on GBV/SEAH throughout Project implementation. Induction sessions will be organized for temporary workers before they start work.</p>	<p><i>(i) The LMP was adopted and published in the PREA and PRODIGY websites on June 16, 2020 and on World Bank website on June 17, 2020.</i></p> <p><i>Any update of LMP should be submitted for approval to the Association prior to implementation.</i></p> <p><i>Approved LMP will be maintained and implemented throughout Project implementation</i></p> <p><i>(ii) Prior to engaging Project workers and contractors and maintained throughout Project implementation.</i></p>	<p>Responsible Entity: PIU Responsible: Financial and Administrative Officer in collaboration with the Environmental and Social Specialist of the PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism (GM) for Project workers, as described in the LMP and consistent with ESS2. This will include reporting and allegation procedures regarding GBV/SEAH and an accountability framework and response to complaints.</p>	<p><i>Grievance mechanism operational prior to engaging Project workers and maintained throughout Project implementation</i></p>	<p>Responsible Entity: PIU</p> <p>Responsible: Environmental and social Specialist of the PIU in collaboration with Gender and Communication Specialist of the PIU</p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>E-WASTE MANAGEMENT PLAN: Electrical and Electronic Waste Management Plan (EEWMP) that includes measures for the rational use of resources and pollution prevention and management of electronic and electric waste produced by the obsolete equipment has been prepared and approved by the Association prior to Project appraisal. Update, adopt, and implement EEWMP in accordance with ESS 3.</p> <p><i>The Project will take appropriate mitigation measures to minimize the impact of the Project on the environment and the natural resources, in accordance with ESS 3, in compliance with the EEWMP approved by the Association</i></p>	<p><i>EEWMP has been submitted to the Association and approved prior to Project appraisal and disclosed both on the PREA and PRODIGY websites on June 16, and on World Bank website on June 17, 2020.</i></p> <p><i>Any update of EEWMP should be submitted for approval to the Association prior to Project implementation.</i></p> <p><i>Once approved, maintained and implemented throughout Project implementation</i></p>	<p>Responsible Entity: PIU</p> <p>Responsible: Environmental and Social Specialist of the PIU</p>
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Resource efficiency and pollution prevention and management measures have been covered under the EEWMP prepared under action 3.1. above.</p>	<p><i>Same timeframe as for the EEWMP.</i></p> <p><i>Maintained and implemented throughout Project implementation</i></p>	<p>Responsible Entity: PIU</p> <p>Responsible: Environmental and social Specialist of the PIU</p>
ESS 4: COMMUNITY HEALTH AND SAFETY			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.1.	<p>GBV AND SEA RISKS: The Recipient will prepare, adopt and implement a standalone GBV Action Plan to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA).</p> <p><i>The GBV Action Plan includes mitigating measures such as the signing of a code of conduct for all Project staff (including the PIU, contractors and workers). This code of conduct, along with clauses on workers' conditions and management, child protection, and GBV prevention, will be included into all bidding documents and all worker's contracts.</i></p> <p><i>Establish and ensure that an accessible and accountable GM related to GBV (GBV GM) is operationalized for the Project, to ensure that any GBV incident related to workers and communities will be addressed in an effective manner with sufficient social sensibility.</i></p>	<p><i>The GBV Action Plan, and GBV GM will be prepared by the Recipient and submitted for the approval of the Association prior to being finalized, and no later than 60 days after Project effectiveness.</i></p> <p><i>Once approved, the GBV Action Plan and GBV GM are implemented throughout Project implementation, and will be updated, as needed, throughout Project implementation.</i></p>	<p><i>Responsible Entity: PIU Coordinator/ Gender specialist</i></p>
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
	NOT RELEVANT AT THIS TIME		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	NOT RELEVANT AT THIS TIME		
ESS 7: INDIGENOUS Peoples/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	NOT RELEVANT AT THIS TIME		
ESS 8: CULTURAL HERITAGE			
	NOT RELEVANT AT THIS TIME		
ESS 9: FINANCIAL INTERMEDIARIES			
	NOT RELEVANT AT THIS TIME		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
10.1.	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p><i>A draft Stakeholder Engagement Plan (SEP) have been prepared and approved by the Association before Project appraisal.</i></p> <p><i>Update, adopt, and implement Stakeholder Engagement Plan (SEP).</i></p> <p><i>Ensure that SEP is incorporated into the Project’s management system, and adequate staffing and budget is allocated to implementing the SEP in accordance with ESS10.</i></p>	<p><i>The SEP was adopted and published both in the PREA and PRODIGY websites on June 16, 2020 and on World Bank website on June 17, 2020.</i></p> <p><i>The SEP will be implemented following Project effectiveness and throughout Project implementation.</i></p> <p><i>SEP to be updated periodically, as required, throughout Project implementation.</i></p> <p><i>Any update of SEP should be submitted for approval to the Association prior to implementation.</i></p>	<p>Responsible Entity: PIU</p> <p>Responsible: Environmental and social Specialist of the PIU</p>
10.2.	<p>PROJECT GRIEVANCE MECHANISM: <i>GM has been be submitted for prior review and approved by the Association as part of the SEP prior to Project appraisal.</i></p> <p><i>Update, adopt, maintain and operate a GM, as described in the SEP.</i></p>	<p><i>GM submitted prior to Project appraisal.</i></p> <p><i>GM to be updated periodically, as required, throughout Project implementation. Any update of GM should be submitted for approval to the Association prior to implementation. Once operational, monitored throughout Project implementation.</i></p>	<p>Responsible Entity: PIU</p> <p>Responsible: Environmental and social Specialist of the PIU</p>
CAPACITY SUPPORT (TRAINING)			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
CS1	<p><i>The PIU will need training in the following areas:</i></p> <ul style="list-style-type: none"> (i) development and implementation of the Stakeholder Engagement Plan (SEP) and in its monitoring & evaluation, (ii) the development and implementation of the Labor Management Procedures (iii) first aid courses to employees/contractors and communities interested (iv) GBV, including SEAH, mitigation, prevention and response measures and the development and implementation of a GBV measures. (v) Inclusive Project implementation to ensure non-discrimination of socially vulnerable populations such poor, illiterate people, sexual and gender minorities.... (vi) Capacity building in other specific aspects of assessment and implementation of environmental and social risk management practices as identified through needs assessments of key Project actors during Project preparation and implementation. (vii) Training within GBV action plan (viii) Training to the Recipient and awareness raising on GBV among all contractors, workers including civil servants involved in the Project 	<p><i>Prior to commencement of Project activities and throughout Project implementation.</i></p>	<p>Responsible Entity: PIU Responsible: PIU Coordinator</p>