

The Republic of the Marshall Islands

**RMI Multisectoral Early Childhood Development – II
P177329**

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

**Negotiated
22 April 2022**

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of the Marshall Islands (**RMI** or the **Recipient**) shall implement the RMI Multisectoral Early Childhood Development (ECD) - II Project (the **Project**), with the involvement of the Ministry of Culture and Internal Affairs, Ministry of Education, Sport and Training, Ministry of Health and Human Services, and Office of the Chief Secretary and Ministry of Finance, Banking and Postal Services as set out in the Financing Agreement. The International Development Association (hereinafter the Association) has agreed to provide financing for the Project.
2. RMI shall 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. RMI shall also comply with the provisions of any other Environmental and Social (**E&S**) documents required under the ESF and referred to in this ESCP, such as the Environmental and Social Management Framework (**ESMF**) and associated Environmental and Social Management Plans (**ESMP**), Labor Management Procedures (**LMP**) and Stakeholder Engagement Plan (**SEP**), and the timelines specified in those E&S documents.
4. RMI is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministries referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Association by RMI as required by the ESCP and the conditions of the legal agreement, and the Association shall monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and RMI, 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, RMI or the Division of International Development Assistance (DIDA) shall agree to the changes with the Association and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Association and RMI or DIDA. The RMI or DIDA shall 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, RMI shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	REGULAR REPORTING Prepare and submit to the Association 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 documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanisms. This reporting shall be included in the six monthly Project progress report to the Association.	<i>Submit 6 monthly project progress reports to the Association throughout Project implementation, commencing after the Effective Date in accordance with the timeframe described in the Financing Agreement.</i>	Centralized Implementation Unit (CIU) Environmental and Social Team (“E&S Team”) of the Division of International Development Assistance (DIDA) to prepare ESHS performance reports, to be submitted to the Association by the Project Implementation Unit (PIU).
B	INCIDENTS AND ACCIDENTS 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. This includes sexual exploitation and abuse / sexual harassment (SEA/SH) incidents. 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, upon the Association’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.	<i>Notify the Association within 48 hours after learning of the incident or accident.</i> <i>A report shall be provided as part of the six-monthly reports to the Association (as described in A above), or within a timeframe acceptable to the Association.</i>	PIU, with technical support from the CIU E&S Team.
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE Maintain CIU staffing arrangement of one full time International Environment Specialist, one full time International Social Specialist, and one full time Majuro-based E&S Officer in the E&S Team. Establish and maintain a Social and Behavior Change Communication and Advocacy Coordinator in the PIU.	<i>Maintain at least one full time Environmental Specialist and one full time Social Specialist and one local officer within the CIU throughout Project Implementation.</i> <i>Recruit at least one Social and Behavior Change Communication and Advocacy Coordinator within the PIU within three months of the Effective Date and maintain throughout Project implementation.</i>	CIU PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.2	MANAGEMENT TOOLS AND INSTRUMENTS a) Update, consult, adopt, disclose and thereafter implement the Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs. b) Screen any proposed Project activity in accordance with the ESMF adopted for the Project and, thereafter, prepare, consult, adopt, disclose, and thereafter implement the Environmental and Social Management Plans (ESMP) as set out in the ESMF.	<i>a) ESMF has been prepared, disclosed and adopted prior to appraisal and shall be implemented in accordance with the terms throughout Project implementation.</i> <i>b) Submit the respective ESMP for the Association's prior review and no objection and adopt, and disclose the ESMP before launching the bidding process for the relevant Project activity. Once adopted, implement the respective ESMP in accordance with its terms throughout Project implementation.</i>	CIU E&S Team is responsible for screening and preparing ESMP and for providing technical assistance to the PIU. PIU is responsible for implementing tools, instruments and other measures in the ESMF, with technical support from the CIU E&S Team.
1.3	MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including the relevant ESMP and the Labor Management Procedures (LMP), into the ESHS specifications of the procurement documents with contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.	<i>Incorporate the relevant aspects prior to the finalization of procurement documents.</i> <i>CESMPs to be prepared prior to the commencement of works, and implemented in accordance with their respective terms throughout Project implementation.</i>	PIU, with technical support from the CIU E&S and Procurement Teams.
1.4	MANAGEMENT OF TECHNICAL ADVISORY CONTRACTS 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 the Association, that are consistent with the ESSs, and ensure that the outputs of such activities comply with the terms of reference and are consistent with the ESSs.	<i>Throughout Project implementation.</i>	PIU with technical support from CIU E&S and Procurement teams.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.5	CONTINGENT EMERGENCY RESPONSE FINANCING Activities carried out under Contingent Emergency Response Component (CERC) must meet ESS requirements. a) Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements including references to the CERC requirements in the ESMF, in accordance with the ESSs. b) Adopt any E&S instruments which may be required for activities under Component 5 of the Project, in accordance with the CERC requirements in the ESMF and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.	<i>a) The adoption of the CERC Manual and, if applicable, other instruments, in form and substance acceptable to the Association, is a withdrawal condition under Section III.B.1(c) of Schedule 2 of the Financing Agreement for the Project.</i> <i>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.</i>	PIU (or the assigned implementing agency for the CERC at the time of the emergency event) with technical support from the CIU E&S Team.
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Update, adopt, and implement the Labor Management Procedures (LMP) that have been developed for the Project.	<i>LMP has been prepared, adopted and disclosed prior to appraisal and shall be implemented in accordance with its terms throughout Project implementation.</i>	PIU and CIU Procurement Team with technical support from the CIU E&S Team.
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Adopt, maintain, and operate the grievance mechanism that has been established for Project workers, as described in the LMP and consistent with ESS2.	<i>Same timeframe as for the implementation of the LMP.</i>	PIU and CIU Procurement Team with technical support from the CIU E&S Team.
2.3	OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES Prepare, adopt, and implement occupational, health and safety (OHS) measures for physical works in Contractor's bid documents as specified in the ESMF and ESMP templates. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.	<i>Preparation of clauses prior to the finalization of procurement documents.</i> <i>Supervision of Contractors throughout Project implementation.</i>	PIU, with technical support from the CIU Safeguards and Procurement teams.

ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	MEDICAL WASTE MANAGEMENT PLANS Prepare, consult, adopt, disclose and implement Medical Waste Management Plans for services with hazardous/medical waste, consistent with ESS3 and in accordance with the screening process in the ESMF.	<i>Plans to be prepared and adopted prior to commencing the implementation of relevant Project activities, and implemented in accordance with their respective terms throughout the activity.</i>	CIU E&S Team responsible for preparing plans in collaboration with the Ministry of Health and Human Services (MOHHS). MOHHS responsible for implementing plans.
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures, including aggregate source and management measures, for building renovations in the TOR for designers.	<i>Prior to the finalization of the Design TOR.</i>	PIU with technical support from the CIU E&S Team.
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from Project activities, and include these measures in the project activity design and ESMP, in a manner acceptable to the Association.	<i>Throughout Project implementation.</i>	PIU with technical support from the CIU E&S Team.
4.2	GENDER-BASED VIOLENCE (GBV) AND SEA/SH RISKS DURING PROJECT IMPLEMENTATION Prepare and finalize Gender-Based Violence Action Plan (incorporating SEA/SH and targeted Child Safeguarding measures) and thereafter adopt the Gender-Based Violence Action Plan in a manner acceptable to the Association.	<i>Prepare and submit Gender-Based Violence Action Plan for the Association's approval within nine months of the Effective Date and implement the plan in accordance with its terms throughout Project implementation.</i>	PIU to prepare and implement the plan, with technical support from CIU.
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	LAND ACCESS SCREENING Not currently relevant. All works are to be undertaken within the existing footprint of government buildings and are to be covered under existing leases for those buildings.	<i>Throughout Project implementation.</i>	PIU with technical support from the CIU E&S Team.

ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	Not currently relevant.		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	Not currently relevant.		
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE Screen any proposed physical works in accordance with the Environmental and Social Management Framework (ESMF) prepared for the Project for cultural heritage risks, and, thereafter, draft, adopt, and implement mitigation measures in the relevant ESMP, as required, in a manner acceptable to the Association.	<i>Same timeframe as for the ESMPs.</i>	CIU E&S Team responsible for screening and preparing ESMP. PIU responsible for implementing ESMP, with CIU E&S Team technical support.
8.2	CHANCE FINDS Describe and implement the chance finds procedures as part of the ESMPs in accordance with the ESMF.	<i>Same timeframe as for the ESMPs.</i>	CIU E&S Team is responsible for screening and preparing ESMP. PIU responsible for implementing ESMP, with CIU E&S Team technical support.
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION & IMPLEMENTATION Update, consult, adopt, disclose and implement the Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10. The first update is to include the Registry of Stakeholder Engagement which includes a list of all stakeholders consulted during project design (using the template provided in the draft SEP), more detailed action plans and implementation arrangements for activity typologies for each Component.	<i>Draft SEP has been prepared, adopted and disclosed prior to appraisal. The first updated SEP to be adopted and disclosed within three months of the Effective Date and implemented in accordance with its terms throughout Project Implementation.</i>	PIU with technical support from CIU E&S Team.
10.2	PROJECT GRIEVANCE MECHANISM Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP which includes separate pathways for: complaints about the conditional cash transfer (CCT) program (eligibility and payments) and concerns about GBV, SEA/SH or child safety.	<i>Existing grievance mechanism shall be updated to include the CCT component and operational within three months of the Effective Date and implemented throughout Project Implementation.</i>	PIU and Implementing Agencies, with technical support from CIU E&S Team.

CAPACITY SUPPORT (TRAINING)			
CS1	ASSESS AND ADDRESS E&S TRAINING NEEDS Develop and administer an E&S management training needs survey (TNS) for Project workers and implementing agency workers to assess capacity building requirements and design a responsive training program. This could include stakeholder mapping and engagement, analysis of E&S issues; occupational health and safety, emergency preparedness and response; management of GBV and child safety issues etc.	<i>Prepare and administer the E&S TNS within three months of the Effective Date.</i>	CIU E&S Team with assistance from the PIU.
CS2	Develop a training package and schedule based on results of the TNS and provide the required, targeted capacity building support throughout implementation.	<i>Implement the training activities as per the schedule specified in the training plan.</i>	PIU to arrange the delivery of training and keep records. CIU E&S Team to prepare and deliver training as per the training plan.