

# The Republic of Djibouti

Ministry of Communication

## Eastern Africa Regional Digital Integration Project, Series of Projects Two (EARDIP-SOP- II) (P180931)

### Environmental and Social Commitment Plan (ESCP)

**Negotiation**  
**14 Octobre 2023**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Djibouti (the Recipient) will implement the Eastern Africa Regional Digital Integration Project, Series of Projects Two (EARDIP-SOPII) with the involvement of the Ministry of Communication, Posts and Telecommunications (MCPT), as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the referred agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESS) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is part of the Financing Agreement. Unless otherwise defined in this ESMP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
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 or unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient, through the MCPT and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient. The Recipient shall promptly disclose the update ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTS</b></p> <p>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 the E&amp;S instruments required under the ESCP, stakeholder engagement activities, the functioning of the grievance management mechanisms.</p>	<p>Submit quarterly reports to the Association throughout the implementation of the Project commencing after the Effective Date.</p> <p>Submit each report to the Association no later than five (05) days after the end of each reporting period.</p>	Project Implementation Unit (PIU)
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly notify the Association without delay of any incident or accident in connection with the Project which has, or is likely to have, a significant adverse effect on the environment, 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 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 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, and within 24 hours in case of a fatality or SEA/SH incident.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association.</p>	MCTP PIU
C	<p><b>CONTRACTORS' MONTHLY REPORTS</b></p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts, and submit such reports to the Association.</p>	Submit the monthly reports to the Association upon request as annexes to the reports to be submitted under action A above.	<p>MCTP PIU</p> <p>Suppliers, contractors, and service providers</p>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Maintain Project Implementation Unit (PIU) with qualified staff and sufficient resources</p>	Maintain a PIU as outlined in the financing agreement. Recruit an environmental specialist, a	MCPT

	to support the management of the Project's ESHS risks and impacts, including an environmental specialist (with OHS experience), a social specialist, and a SEA/SH consultant.	social specialist, and a SEA/SH consultant no later than 90 days after the project effective date and maintain these positions throughout Project implementation.	
1.2	<p><b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <p>1. Adopt and implement an Environmental and Social Management Framework (ESMF) for the Project, in accordance with the relevant ESS.</p> <p>2. Adopt and implement site specific Environmental and Social Impact Assessments (ESIAs) and corresponding Environmental and Social Management Plans (ESMPs) 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. The TORs shall be subject to the Association's no objection.</p>	<p>1. Adopt the ESMF before effectiveness, and thereafter implement the ESMF throughout Project implementation.</p> <p>2. Adopt the ESIAs and ESMPs before launching the bidding processes for sub-project activities. Once adopted, the ESIAs/ESMPs will be implemented throughout the implementation of the sub-projects.</p>	MCTP PIU
1.3	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&amp;S instruments, the Labor Management Procedures (LMP) and code of conduct (CoC), into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply, and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p>	<p>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise contractors throughout Project implementation.</p>	MCPT PIU
1.4	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that consultancies, studies (including feasibility studies), capacity-building, training, and any other technical assistance activities within the framework of the Project are carried out in accordance with terms of reference acceptable to the Association that are consistent with the ESS. Thereafter, ensure that the outputs of these activities comply with the terms of reference.</p>	Throughout Project implementation.	MCPT PIU
1.5	<p><b>CONDITIONAL [EMERGENCY] [EARLY] RESPONSE FINANCING</b></p> <p>1. Ensure that the Contingent Emergency Response Component (CERC) Manual, as referred to in the financing agreement, includes a description of the ESHS assessment</p>	1. The adoption of the CERC manual in substance and form acceptable to the Association, is a condition of withdrawal under Section [XX] of	MCPT PIU

	<p>and management arrangements, [including, the ESMF-CERC to be referred to in the CERC Manual] for the implementation of the CERC Part, in accordance with the ESS.</p> <p>2. Adopt any E&amp;S instruments that may be required for activities under the CERC Part of the Project, in accordance with the CERC Manual and the ESS, 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>	<p>Appendix 2 of the Legal Agreement for the Project.</p> <p>2. Adopt any required environmental and social instruments 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 environmental and social instrument is required. Implement the environmental and social instruments in accordance with the conditions stipulated therein, throughout the implementation of the Project.</p>	
1.6	<p><b>PERMITS, APPROVALS AND AUTHORIZATIONS:</b></p> <p>The Recipient will ensure that it obtains the necessary permits, approvals, and — authorizations from the competent national authorities; it undertakes to comply with and ensure compliance with the conditions associated with these permits, approvals, and authorization throughout the implementation of the Project.</p>	<p>Before starting any activity requiring a permit or authorization.</p>	<p>MCPT PIU</p> <p>General Managers of enabling executing agencies</p>
<b>ESS2 : LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (OHS) (including personal protective equipment and emergency preparedness and response), the code of conduct (including relating to sexual exploitation and abuse and sexual harassment), forced labor, child labor, the grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors and supervising firms.</p>	<p>Adopt the LMP prior to the effectiveness, then apply these procedures throughout the Project's implementation.</p>	<p>MCPT PIU</p>
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish and operate a grievance mechanism (GM) for Project workers, as described in the LMP and consistent with ESS2.</p>	<p>Establish the grievance mechanism (GM) before engaging Project workers for the Project, and thereafter maintain and operate it throughout Project implementation.</p>	<p>MCP PIU and suppliers/providers.</p>

<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<b>WASTE MANAGEMENT PLAN</b> Adopt and implement a management plan for hazardous and non-hazardous e-waste, in compliance with ESS3.	Develop a plan before effectiveness as part of the ESMF and implement throughout Project implementation.	MCPT PIU
3.2	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> Adopt measures and actions to manage the waste and hazardous materials described in the ESMF to prevent pollution and use safe handling of any hazardous materials.  Similarly, as part of the environmental and social assessment of each sub-project, ensure that all sources of pollution (liquid, solid and gaseous) are identified and analyzed, and that appropriate specific mitigation measures are developed and implemented.  These measures and actions will be specified in the ESMP.  The Beneficiary will ensure that the project partner and contractors/service providers develop and implement a waste and hazardous materials management plan.	Same deadlines as Section 1.2 (2) above.	MCPT PIU
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>TRAFFIC AND ROAD SAFETY</b> Incorporate measures to manage traffic and road safety risks in the ESMP to be prepared under action 1.2 above.	Same deadlines as for the adoption and implementation of the ESMP under Section 1.2 (2) above.	MCPT PIU
4.2	<b>COMMUNITY HEALTH AND SAFETY</b>  Assess and manage the risks and impacts of Project activities on local populations, including SEA/SH issues and the dissemination of information concerning risk mitigation measures and the behavior of Project workers, and include mitigation measures in the ESMF.  Prepare a Security Management Plan (SMP) based on the Security Risk Assessment (SRA), setting out the measures planned to ensure safety and mitigate risks, and include it in the appendix to the ESMF.	Same deadlines as for the adoption and implementation of ESMF under Section 1.2 (2) above.	MCPT PIU
4.3	<b>SEA AND SH RISKS</b>  Adopt and implement a SEA/SH Prevention and Response Action Plan as part of the ESMP, to assess and manage the risks of SEA and SH.	Adopt the SEA/SH Prevention and Response Action Plan as part of the ESMP and thereafter implement it throughout Project implementation.	PIU
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<b>RESETTLEMENT FRAMEWORK</b>		MCPT PIU

	Adopt and implement a resettlement framework (RF)	Adopt the RF before Effective Date and thereafter implement the RPF throughout Project implementation.	
5.2	<b>RESETTLEMENT PLANS</b> Adopt and implement a resettlement plan (RP) for each Project activity under the Project for which the RF requires such a plan, as set out in the RF, consistent with ESS5.	Adopt and implement the respective Resettlement Plans, including ensuring that before taking possession of land and related assets, full compensation has been provided and displaced people have been resettled and moving allowances have been granted.	MCPT PIU
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS</b> Adopt and implement a biodiversity management plan (BMP) set out in the ESMF prepared for the Project, and in accordance with ESS6.	Adopt the BMP before the effectiveness, and apply it throughout the project's implementation.	MCPT PIU
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
	This standard is not relevant as there are no known groups which meet the criteria under ESS7.		
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<b>CULTURAL HERITAGE RISKS AND IMPACTS</b> Assess risks and address them in the ESIA/ESMP.	Before the start of project activities	MCPT PIU
8.2	<b>CHANCE FINDS</b> Describe and implement the chance finds procedures, as part of the ESMF and ESMP of the Project.	Apply these procedures throughout Project implementation.	MCPT PIU
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
	Not relevant as there are no financial intermediaries in the project		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b> 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,	SEP adopted prior to Appraisal, and thereafter apply the SEP throughout the project's implementation.	MCPT PIU

	relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.		
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism (GM), 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>Any project related grievances prior to the operationalization of the project level GM, will be handled by the PIU which will make available and publicize multiple channels for stakeholders to submit grievances and questions.</p>	Establish the grievance mechanism, including the GM to address SEA/SH incidents, no later than three months after Effective Date, and thereafter maintain and operate the mechanism throughout Project implementation.	MCPT PIU
<b>CAPACITY SUPPORT</b>			
RC1	<ul style="list-style-type: none"> <li>- <b>Target group:</b> PIU, implementing partner agencies, stakeholders, Steering Committee, Project component heads.</li> <li>- <b>Training modules:</b></li> <li>- The Bank's new Environmental and Social Framework (ESF),</li> <li>- Occupational health and safety, including risks related to the use of safety personnel, COVID-19</li> <li>- Complaints management mechanism, including the filing and processing of claims</li> <li>- SEA/SH, violence against children risk awareness; SEA/SH prevention and response action plan, including CoPs.</li> </ul>	Starting three months after Effective Date and at quarterly intervals during project implementation	MCPT PIU
RC2	<p><b>Target group:</b> Beneficiaries/ local communities/ authorities/ NGOs</p> <p><b>Training modules :</b></p> <ul style="list-style-type: none"> <li>- GM registration and processing procedure</li> <li>- SEA/SH risk awareness, SEA/SH prevention and response action plans and codes of</li> </ul>	Starting three months after Effective date and at quarterly intervals during project implementation	MCPT PIU



	<p>conduct (CoC)</p> <ul style="list-style-type: none"> <li>- Community safety and security, including road safety, prevention of the spread of COVID-19, STDs and STIs</li> </ul>		
	<p><b>Target group:</b> <i>Suppliers/Partners/Subcontractors and workers</i></p> <p><b>Training modules:</b></p> <ul style="list-style-type: none"> <li>- Work and working conditions module,</li> <li>- Employment conditions in accordance with national labor laws and codes of conduct for suppliers, contractors, and subcontractors</li> <li>- Child labor and minimum age of employment rules.</li> <li>- SEA/SH complaints mechanism module,</li> <li>- Procedure for recording and handling complaints, archiving,             <ul style="list-style-type: none"> <li>- Occupational health and safety, including the prevention of emergencies, and how to prepare for and respond to such situations, including the risks associated with the use of security personnel, COVID-19; STDs and HIV/AIDS</li> <li>- Workforce management procedures, including GMof workers</li> <li>- Workers’ Grievance Mechanism</li> <li>- Incident reporting and implementation of corrective measures</li> </ul> </li> </ul> <p>-Waste management</p>	<p>Starting three months after Effective date and at quarterly intervals during project implementation</p>	<p>MCPT's PIU and companies</p>