

Kingdom of Lesotho

September 2023

Ministry of Finance and Development Planning

Lesotho Public Sector Foundations for Service Delivery
Project (P174141)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

[TBU before Signing]

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Kingdom of Lesotho (Recipient) will implement the Lesotho Public Sector Foundations for Service Delivery Project (LPSFSDP) (the Project), with the involvement of the Ministry of Finance and Development Planning (MFDP), as set out in the Financing Agreement.
2. The Recipient 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 Association. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, 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, the 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 and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through the Ministry of Finance (MoF), 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 updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</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 E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s)</p>	<p>Monthly Reporting throughout project implementation.</p> <p>Semi-annually as part of Project progress reports.</p>	PIT within MoF
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, 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 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.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association.</p>	PIT within MoF
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain a Project Implementation Team (PIT) with qualified staff and resources to support management of ESHS risks and impacts of the Project including an Environmental and Social Specialist (ESS).</p>	<p>The Organizational structure should be fully established within 90 days after Project effectiveness.</p> <p>The organizational structure, including the specialists, should be maintained throughout Project implementation.</p>	MoF
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>1. Develop, disclose and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10.</p> <p>2. Develop, disclose and implement a Labour Management Procedures (LMP) for the Project, consistent with ESS2, as part of the Project Operation Manual.</p> <p>3. Develop and cause the PIT to implement the site-specific Environmental and Social Management Plan (ESMP), for any subprojects as needed.</p>	<p>1. Adopt and implement the SEP prior to Appraisal, and throughout the project thereafter.</p> <p>2. Adopt the LMP prior to project effectiveness, and throughout the project thereafter.</p> <p>2. Adopt the ESMP prior to the carrying out of any subproject that requires the adoption of such an ESMP. Once adopted, implement the respective ESMP throughout Project life.</p>	PIT within MoF
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies, 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. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout the project implementation.	PIT within MoF
<p>ESS 2: LABOR AND WORKING CONDITIONS is relevant.</p>			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Develop, disclose, and implement Labor Management Procedures (LMP) 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.</p>	<p>To be developed as an annex to the Project’s Operations Manual and disclosed before project effectiveness.</p> <p>To be implemented throughout project implementation.</p>	PIT within MoF
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	To be established in the same timeframe as 2.1.	PIT within MoF

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		To be implemented throughout project implementation.	
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT is relevant			
3.1	WASTE MANAGEMENT PLAN Develop and implement a E-Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes, consistent with ESS3.	Prepare and adopt the E-WMP, prior to Appraisal, and thereafter implement the WMP throughout Project implementation.	PIT within MoF
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action [1.2] above.	Once adopted, implement the ESMP requirements throughout Project implementation.	PIT within MoF
ESS 4: COMMUNITY HEALTH AND SAFETY is not currently relevant.			
4.2	COMMUNITY HEALTH AND SAFETY Adopt and implement occupational health and safety (OHS) measures, including specific measures to ensure that all Project activities minimize the spread of infectious diseases like TB, HIV/AIDS and COVID-19. Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, response to emergency situations, and include mitigation measures in the ESMP.	Adopt before Appraisal and implement throughout project life.	PIT within MoF
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT (Not Relevant)			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES (Not Relevant)			
6.1			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES (Not Relevant)			
ESS 8: CULTURAL (Not Relevant)			
8.1			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
8.2			
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).] (Not Relevant)			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE is relevant			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Develop 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.</p>	Disclose and adopt the SEP prior to Appraisal and thereafter implement the SEP throughout Project implementation.	PIT within MoF
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>	GRM to be established in the same timeframe as 10.1 and maintained throughout project implementation.	<ul style="list-style-type: none"> • MoF • LPSFSDP - PIT
CAPACITY SUPPORT			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>CS1</p> <p>The GoL will design and implement training for targeted groups involved in the Project to improve their awareness of risks and mitigate the impacts of the LPSFSDP. The target groups for this training include Beneficiary/Participating Ministries, District Councils.</p> <p>This ESCP proposes a preliminary training plan covering the following topics.</p> <ul style="list-style-type: none"> • ESF Requirements. • Roles and responsibilities for environmental and social issues. • Occupational health and safety (including TB, HIV/AIDS and COVID-19 recommendation). • Grievance Mechanisms and codes of conduct 	<p>Training of target groups to be delivered within 90 days following project effectiveness.</p> <p>This plan will be adapted to meet needs during Project implementation.</p>	<ul style="list-style-type: none"> • PIT within MoF • World Bank
<p>CS2</p> <p>The GoL will design and implement training for the project workers improve their awareness of risks and mitigate the impacts of the LPSFSDP. The Project workers include PIT staff, Contractor staff and staff of other project service providers. The training will cover the following topics.</p> <ul style="list-style-type: none"> • ESF Requirements, including grievance mechanisms. • Roles and responsibilities for environmental and social issues. • Occupational health and safety (including TB, HIV/AIDS and COVID-19 recommendation). • Labour requirements. • Emergency prevention and preparedness and response arrangements to emergency situations. • Managing GBV/SEA risks. • Maintaining GRM and keeping GRM log. • E-Waste Management. 	<p>Training for PIT and project staff delivered within 90 days following project effectiveness.</p> <p>Training for PIT consultants Repeated as necessary throughout project.</p> <p>This plan will be adapted to meet needs during Project implementation.</p>	<ul style="list-style-type: none"> • PIT within MoF • World Bank