

**Government of Sindh
School Education and Literacy Department
(SELD)**

**SINDH EARLY LEARNING ENHANCEMENT
THROUGH CLASS TRANSFORMATION
(SELECT)
P172834**

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

16th July 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Government of Sindh will implement the Sindh Early Learning Enhancement Through Class Transformation (SELECT) Project (the **Project**), with the involvement of the School Education and Literacy Department (SELD). The World Bank (hereinafter the **Bank**) has agreed to provide financing for the Project.
2. Government of Sindh 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. Government of Sindh 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 Framework (ESMF), Environmental and Social Management Plans (ESMP), Labor Management Procedures, Community Health and Safety Plan, Gender-Based Violence (GBV) Action Plan, and Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S documents.
4. Government of Sindh 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 Bank by Government of Sindh, through SELD and P&D Department, as required by the ESCP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Bank and Government of Sindh, 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, SELD will agree, to the changes with the Bank 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 Bank and the Government of Sindh. The SELD 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 government of Sindh or through the provisions under the contract agreement shall provide additional the funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, community health and safety impacts, and in particular GBV action plan, all due to project activities.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>The Project will prepare and submit to the Bank 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 management tools /documents required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>	<p>Six-monthly ESCP compliance monitoring reports would be prepared and submitted throughout the Project lifecycle. The same will provide relevant information to be included in the Project ISR Report.</p>	<p>SELD-PMIU</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>SELD will promptly notify the Bank of any incident or accident related to the Project and will provide a report, which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers the public or workers or any other affected party, due to the risks identified in the environmental and social assessment.</p> <p>SELD will provide sufficient details regarding the incident or accident, indicating immediate measures taken to address it, and include information provided by any contractor and supervising entity, as appropriate.</p>	<p>Promptly within 24 hours after learning of the incident or accident. A detailed report can follow within a timeframe agreed at the time with the Bank.</p>	<p>Project Director</p>
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>The PIU shall provide quarterly contractors progress and monitoring reports to the Bank especially on issues related to ESF as specified in various documents.</p>	<p>Quarterly</p>	<p>Project Director</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		
<p>1.1 ORGANIZATIONAL STRUCTURE</p> <p>SELD will establish and maintain an Environment and Social Management Unit within the PMIU, with suitable staff and resources to support management of E&S risks including the Specialist(s) for Environment, Social Safeguards / Social Development specialist with support gender and community health and safety staff. Such Specialist(s) will also assist the Supervision consultant and contractor in environmental and social screening, supervision and monitoring including the development of ESMF, ESMPs, etc. as required.</p> <p>Contractors will appoint qualified E&S specialist with all necessary material resources which will support in Environmental and Social Screening / supervision and monitoring.</p> <p>PIU will execute Third-Party Validation (TPV) exercise for annual monitoring of Environment and Social compliance progress during the Project implementation and will share their report with the bank.</p>	<p>Within 90 days after Project effectiveness and before issuing first bidding document and first procurement order. This organizational structure, including the specialist(s), should be maintained throughout Project implementation.</p> <p>Before commencement of the project civil works</p> <p>Annually throughout the project lifecycle</p>	<p>Project Director Supervision consultant Contractor</p>
<p>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>SELD will carry out environmental and social assessment to prepare an ESMF, to identify and assess the environmental and social risks and impacts of the Project and suggest appropriate mitigation measures under ESS1 with reference to other relevant ESS specifically ESS3 Resource Efficiency and Pollution Prevention and Management, and ESS4 Community Health and Safety. The ESA will inform the development of the ESMF.</p>	<p>12 weeks from project effectiveness.</p> <p>Disclosure and Bank Clearance of ESMF (and all safeguards documents prepared under ESCP) completed before issuance of any bidding document and prior to commencement of any civil works under the overall Project</p> <p>Disclosure and Bank Clearance of subproject level ESMPs completed before issuance of any bidding document and prior to commencement of any civil works under any of its Sub-Projects.</p>	<p>Consultant under the supervision of the Project Director</p>

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>SELD will develop and disclose ESMF acceptable to the bank. ESMF will include Gender Action Plan and GBV Action Plan</p> <p>Develop sub Subprojects Screening Forms and Impacts Checklist Forms as part of the ESMF to be used to determine requirement for follow ESMPs etc.</p> <p>Environmental and Social Management Plans (ESMPs) will be prepared and disclosed.</p>	<p>ESMF will be prepared within 12 weeks from project effectiveness and will require prior approval from the Bank, and once approved, will apply throughout Project implementation.</p> <p>ESMP for all subprojects will be prepared prior to issuance of bidding documents for civil works and will be approved by the Bank. Once approved, the ESMPs will be disclosed and implemented throughout Project implementation.</p> <p>Disclosure and Bank Clearance of ESMF and ESMPs (all safeguards documents prepared under ESCP) required before issuance of any bidding document and prior to commencement of any civil works.</p>	PMIU
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>Environmental and social requirements (reflecting ESCP) will be included in the procurement and contracting process including bidding documents, for potential civil works.</p> <p>SELD will monitor Contractor commitment and compliance and ensure contractors provide details on contractor's oversight on environmental, social, health and safety (ESHS) performance, and ensure compliance as per ESCP requirements.</p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, and the Labor Management Procedures, into the ESHS specifications of the procurement documents with contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts.</p>	<p>Prior to the preparation of procurement documents and issuing bidding documents.</p> <p>Contractors' supervision on implementation of ESCP, ESHS and all other relevant E&S requirements to continue throughout project implementation.</p>	Project Director with the assistance of Specialist(s) or dedicated/qualified staff.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Develop Labor Management Procedures (LMP) for the Project.</p>	<p>To be developed after project effectiveness and before issuing first bidding document and first procurement order</p> <p>Supervision of implementation of LMP throughout the Project</p>	<p>Social Safeguard specialist in coordination/consultation with officers/officials familiar with local labour laws will conduct this exercise under the supervision of Project Director</p>
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>	<p>Immediately after project effectiveness, Grievance Mechanism operational prior to engaging any project workers and maintained throughout Project implementation.</p>	<p>Project Director with the assistance of Social Safeguard specialist</p>
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>SELD to develop and implement occupational, health and safety (OHS) measures. These will benefit from the ESA conducted under ESS1, and the ESMF prepared as a result.</p> <p>SELD to ensure to make OHS measures part of the bidding documents, contractors' contracts and ensure compliance by the Contractors.</p> <p>SELD to prepare Emergency Preparedness and Response measures incorporated in OHS measures guideline as part of subproject ESMPs prior to commencement of works.</p>	<p>Prior to initiating first procurement order and full-scale project activities. Maintained throughout Project implementation.</p>	<p>Specialist(s) for Environment / Social safeguard standards</p> <p>Contractors</p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>E-WASTE MANAGEMENT PLAN: Prepare, adopt, and implement an E-Waste Management Plan.</p> <p>Not required.</p>	<p><i>Not relevant</i></p>	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</p> <p>Resource efficiency and pollution prevention and management measures will be covered under the ESMP to be prepared under action 1.3 above.</p> <p>SELD will ensure incorporation of pollution control compliance, i.e. compliance with applicable emission standards and mitigation measures as developed in relevant E&S documents in the C-ESMP.</p> <p>SELD shall develop and implement a waste management plan including hazardous materials and chemicals. The plan will be made part of ESMPs.</p>	<p>Prepared within 12 weeks from project effectiveness and will require prior approval from the Bank, and once approved, will apply throughout Project implementation</p>	<p>Environment Specialist -PMIU, Supervision Consultants</p> <p>Contractors</p>
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY: Adopt and implement measures and actions included in a Traffic and Road Safety Plan, to assess and manage traffic and road safety risks as required in the ESMF and ESMPs (will be a part of the C-ESMP) to be developed under action 1.3 above.</p>	<p>Prepared within 12 weeks from project effectiveness and will require prior approval from the Bank, and once approved, will apply throughout Project implementation</p> <p>As part of ESMP (and C-ESMP) for all subprojects, to be prepared prior to issuance of bidding documents for civil works and to be approved by the Bank.</p>	<p>Specialist Environment/social safeguard within PMIU</p> <p>Supervision Consultants Contractors at the Construction Stage</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.2	<p>COMMUNITY HEALTH AND SAFETY:</p> <p>A Community Health and Safety Plan will be developed and implemented to manage and mitigate risks associated with natural and man-made disasters (floods, fire, etc.), construction activities (dust, noise, exposure to strangers, etc.), harassment, extortion, culturally inappropriate behavior, etc. This Plan will be developed as part of the ESMF, and will be further refined for each ESMP (as part of C-ESMP).</p>	<p>Prepared within 12 weeks from project effectiveness and will require prior approval from the Bank, and once approved, will apply throughout Project implementation</p> <p>As part of ESMP (and C-ESMP) for all subprojects, to be prepared prior to issuance of bidding documents for civil works and to be approved by the Bank.</p>	<p>Specialist in the PMIU for ESMF</p> <p>Supervision Consultants Contractors at the Construction Stage</p>
4.3	<p>GBV AND SEA RISKS:</p> <p>Prepare, adopt, and implement a stand-alone Gender-Based Violence Action Plan (GBV Action Plan), to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA).</p>	<p>Prepared within 12 weeks from project effectiveness and will require prior approval from the Bank, and once approved, will apply throughout Project implementation</p>	<p>Specialist within PMIU with the help of GBV qualified staff</p>
4.4	<p>GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION:</p> <p>GBV Action Plan will focus on project implementation and sufficient funds will be made available</p>	<p>Action Plan prepared and Funds allocated within 12 weeks from project effectiveness and will require prior approval from the Bank</p>	<p>Project Director</p>
4.4	<p>SECURITY PERSONNEL:</p>	<p><i>Not Applicable</i></p>	
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT PLANS:</p>	<p><i>Not relevant</i></p>	
5.2	<p>GRIEVANCE MECHANISM:</p>	<p><i>Not relevant</i></p>	
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS:</p>	<p><i>Not relevant</i></p>	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	INDIGENOUS PEOPLES PLAN:	<i>Not relevant</i>	
7.2	GRIEVANCE MECHANISM:	<i>Not relevant</i>	
ESS 8: CULTURAL HERITAGE			
8.1	CHANCE FINDS: Prepare, adopt, and implement the chance finds procedure described in the ESMF developed for the Project.	Prepared within 12 weeks from project effectiveness and will require prior approval from the Bank, and once approved, will apply throughout Project implementation	Consultant under the supervision of the Project Director
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	ESMS:	<i>Not relevant</i>	
9.2	FI ORGANIZATIONAL CAPACITY:	<i>Not relevant</i>	
9.3	SENIOR MANAGEMENT REPRESENTATIVE:	<i>Not relevant</i>	
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION: SELD will prepare and disclose a Stakeholder Engagement Plan (SEP) for the design and implementation of the Project prior to appraisal.	Developed and Disclosed by Project Appraisal Implement throughout the Project lifecycle	Specialist (Social Safeguard/Development) within PMIU under the supervision of Project Director
10.2	PROJECT GRIEVANCE MECHANISM: Develop and implement the arrangements for the Grievance Redress Mechanism (GRM). The GRM will be developed as part of SEP.	Within 60 days of project effectiveness and before issuing first bidding document and first procurement order	Project Director with support of Specialist

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
CAPACITY SUPPORT (TRAINING)			
CS1	<p>PIU staff, Supervision consultant, Contractors training may be required in:</p> <ul style="list-style-type: none"> Stakeholder Engagement and mapping ESMP Implementation Occupational Health and Safety Emergency Response Preparedness Disaster Risk Reduction, Response and Management Community Health and Safety Monitoring and Reporting GBV & Child Protection Disability inclusion Waste Management Documentation and Reporting Labor Management Procedures Traffic Road and Safety Grievance Redress Mechanisms 	Prior to initiation of civil works	PMIU Environment and Social Management Unit under the supervision of Project Director
CS2	<p>Training for Project workers:</p> <ul style="list-style-type: none"> ESMP Implementation Labor Management Procedures Occupational Health and Safety Emergency Response Preparedness Community Health and Safety Grievance Redress Mechanisms 	Prior to initiation of civil works	PMIU Environment and Social Management Unit under the supervision of Project Director