

**Independent State of Papua New Guinea
Child Nutrition and Social Protection Project
(P174637)**

DRAFT

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

February 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Independent State of Papua New Guinea (the Recipient) shall implement the Child Nutrition and Social Protection Project (the Project), with the involvement of the following Ministries/agencies/units: Department of Justice and Attorney General, National Department of Health, and Department for Community Development and Religion and other implementing partners. The International Development Association (hereinafter the Association) and the International Bank for Reconstruction and Development and the International Development Association acting as administrator of the Papua New Guinea and Pacific Islands Umbrella Facility Multi-Donor Trust Fund, have agreed to provide financing for the Project.
2. The Recipient 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. The Recipient shall also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as the Social Assessment / Social Management Plan (SA / SMP), Stakeholder Engagement Plan (SEP), Labor Management Procedures, and Gender Based Violence Action Plan 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 shall 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 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 the Recipient, 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 shall update the ESCP to reflect the agreed-upon changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Association and the Recipient. The Recipient 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, the Recipient 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	<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 the environmental and social (E&S) documents required under the ESCP, stakeholder engagement activities and grievances log, Labor Management Procedures (LMP) implementation, contractor’s ESHS implementation (when required for the improvement of physical facilities/equipping the existing facilities), ESHS incidents, and functioning of the grievance mechanism(s).</p>	<p><i>Six-monthly throughout Project implementation.</i></p>	<p><i>Coordinated by the Department of Justice and Attorney General (DJAG) with inputs from National Department of Health (NDoH) and Department for Community Development and Religion (DfCDR)</i></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. 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, 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>Minor incidents shall be reflected in the six-monthly reports to the Association, serious and severe incidents shall be reported to the PCU Project Manager and the Association within 24 hours of their occurrence.</i></p> <p><i>A report shall be provided to the Association, within a timeframe acceptable to the Association, as requested.</i></p>	<p><i>DJAG; NDoH; and DfCDR</i></p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>a. DJAG shall establish a Project Coordination Unit (PCU) which shall be responsible for implementing Component 3 and for overseeing and reporting on the implementation of the ESCP and the E&S instruments. The PCU shall be maintained with qualified staff and resources to support management of E&S risks including a Social, Environmental and Communication Specialist(full-time); and Gender Based Violence Specialist (part-time). These specialists will also support NDoH and DfCDR.</p>	<p><i>a. A Social, Environmental and Communication Specialist; and GBV specialist shall be recruited/appointed to the PCU no later than 30 days after the effective date of the legal agreement (Effective Date) and retained throughout Project implementation.</i></p>	<p><i>a. DJAG</i></p> <p><i>b. NDoH</i></p> <p><i>c. DfCDR</i></p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<p>b. NDoH shall be responsible for implementing Component 1 and shall establish a Component Management Unit (CMU) responsible for overseeing and reporting on the implementation of the ESCP and E&S instruments for this component. The CMU shall be maintained with qualified staff and resources to support management of E&S risks including and Social, Environmental and Engagement Specialist (part-time).</p> <p>c. DfCDR shall be responsible for implementing Component 2 and shall establish a CMU responsible for overseeing and reporting on the implementation of the ESCP and E&S instruments for this component. The CMU shall be maintained with qualified staff and resources to support management of E&S risks including a Social, Environmental and Engagement Specialist (part-time).</p>	<p>b. A part-time Social Risk and Engagement Specialist shall be recruited/appointed to the NDoH CMU no later than 60 days after the Effective Date and retained throughout Project implementation.</p> <p>c. A part-time Social Risk and Engagement Specialist shall be recruited/appointed to the DfCDR CMU no later than 60 days after the Effective Date and retained throughout Project implementation.</p> <p><i>The PCU and CMUs shall be maintained throughout Project implementation.</i></p>	
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT Prepare, disclose, consult, adopt, implement and update the Social Assessment and Management Plan (SA/MP) that has been prepared for the Project, in a manner acceptable to the Association. Update shall consider lessons from early project implementation.</p>	<p><i>The SA/MP (dated 2nd February 2022) has been prepared, disclosed consulted and adopted. Implement throughout project; update prior to expansion to additional provinces and within 90 days of the Project mid-term review.</i></p>	<p>DJAG with inputs from NDoH; and DfCDR</p>
1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS Prepare, disclose, consult, adopt, implement and update as necessary the sub grant activity instruments including Waste Management Plans, Codes of Environmental and Social Practice (CoESPs) as required in accordance with the SA/MP, in a manner acceptable to the Association.</p>	<p><i>Before launching the procurement process for the relevant Project activities, and thereafter throughout the carrying out of such activities.</i></p>	<p>DJAG; NDoH; and DfCDR</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p>MANAGEMENT OF IMPLEMENTING PARTNERS AND CONTRACTORS</p> <p>a. Incorporate the relevant aspects of this ESCP, including, inter alia, the SA/SMP, SEP, CoESP and relevant other instruments, the LMP and relevant ESS2 requirements, and any other required ESHS measures, into the ESHS specifications of the procurement documents and/or agreements/contracts with implementing partners and contractors.</p> <p>b. Thereafter ensure that the implementing partners and other contractors comply with the ESHS specifications of their respective agreement/contracts.</p>	<p>a. Before launching the procurement process</p> <p>b. During the implementation of the agreement/contract</p>	DJAG; NDoH; and DfCDR
1.5	<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.</p> <p>Ensure that any outputs from the technical assistance activities are consistent with the ESSs</p>	The respective terms of reference and outputs shall be submitted to the Association for review and no objection throughout Project implementation	DJAG; NDoH; and DfCDR
1.6	<p>EXCLUSIONS:</p> <p>The following types of activities shall not be eligible for financing under the Project:</p> <ul style="list-style-type: none"> • Activities that may cause long term, permanent and/or irreversible (e.g. loss of major natural habitat) adverse impacts; • Activities with moderate, substantial or high levels of environmental risk; • Activities that have high probability of causing serious adverse effects to human health and/or the environment • Activities with high levels of social risk; • Activities that may affect lands or rights of indigenous people or other vulnerable minorities; • Activities that may involve resettlement or land acquisition or adverse impacts on cultural heritage; and • Other excluded activities set out in the SA/MP of the Project. 	<i>These exclusions shall be applied prior to the commencement of any project activities</i>	DJAG; NDoH; and DfCDR
ESS 2: LABOR AND WORKING CONDITIONS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Prepare, disclose, consult, adopt and implement the Labor Management Procedure (LMP) that has been developed for the Project.</p>	<i>The LMP (dated 2nd February 2022) has been prepared, disclosed, consulted and adopted. Implement throughout Project Implementation.</i>	<i>DJAG; NDoH; and DfCDR</i>
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	<i>Maintain and operate throughout Project Implementation.</i>	<i>DJAG; NDoH; and DfCDR</i>
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Implement occupational, health, and safety (OHS) measures including compliance with the CoESP, World Bank Group Environmental, Health and Safety Guidelines (EHSGs), GIIP and national legislation. Incorporate these requirements and the implementation of the CoESP into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply with the ESHS specifications of their respective contracts.</p>	<i>Throughout Project implementation</i>	<i>DJAG; NDoH; and DfCDR</i>
2.4	<p>WORKER CODE OF CONDUCT</p> <p>a. Ensure that all direct and contracted workers adhere to a Code of Conduct (CoC) which meets the requirements outlined in the LMP.</p> <p>b. Provisions to prevent Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) shall be included in the CoC for direct and contracted workers and adopted and applied under the Project.</p>	<i>Throughout Project implementation.</i>	<i>DJAG; NDoH; and DfCDR</i>
2.5	<p>CHILD LABOR AND MINIMUM AGE</p> <p>Ensure all direct and contracted workers hired for the Project are over 18 years of age.</p> <p>Ensure that all community workers meet minimum age of 14 or over. Ensure that community workers under the age of 18 are only engaged under strict conditions including risk assessment, monitoring and restrictions on engaging in work which is hazardous or interferes with the child's health, wellbeing or development.</p>	<i>Throughout Project implementation.</i>	<i>DJAG; NDoH; and DfCDR</i>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.1	Relevant aspects of this standard shall be considered, as needed, under action 1.3 above, including, inter alia, measures to manage e-wastes and other types of hazardous and non-hazardous wastes and requirements outlined in the CoESP.	<i>Prior to the procurement of items which may require management of waste or commencement of immunization activities; and prior to carrying out any works.</i>	<i>DJAG; NDoH; and DfCDR</i>
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	Implement measures outlined in the SA/SMP to minimize the potential for community exposure to communicable diseases; ensure that individuals or groups who, because of their circumstances, may be disadvantaged or vulnerable, have access to the development benefits resulting from the Project; and prevent and respond to sexual exploitation and abuse, and sexual harassment.	<i>Throughout Project implementation.</i>	<i>DJAG; NDoH; and DfCDR</i>
4.3	GBV AND SEA RISKS Implement and update as needed the project's Gender and Gender-Based Violence Action Plan (Gender and GBV Action Plan), to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA).	<i>Throughout Project implementation.</i>	<i>DJAG; NDoH; and DfCDR</i>
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	Not relevant		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	Not relevant		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	INDIGENOUS PEOPLES: Implement measures outlined in the SA/SMP and the SEP to promote the inclusion of Indigenous Peoples (IPs) in a manner consistent with ESS7 and acceptable to the Association to make sure that IPs are fully consulted in a culturally-appropriate manner about and have opportunities to benefit from the Project activities in a manner acceptable to the Association.	<i>Throughout Project Implementation.</i>	<i>DJAG; NDoH; and DfCDR</i>
ESS 8: CULTURAL HERITAGE			
8.1	Not relevant		
ESS 9: FINANCIAL INTERMEDIARIES			

9.1	Not relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Prepare, disclose, consult, adopt, implement and update, the SEP that has been developed for the Project, in a manner acceptable to the Association. Update shall consider the lessons from early project implementation</p>	<p><i>The SEP (dated 2nd February 2022) has been prepared, disclosed, consulted and adopted. The SEP shall be updated as needed, and prior to expansion to additional provinces and within 90 days of the project mid-term review. The SEP shall be implemented throughout Project implementation.</i></p>	<p><i>DJAG with inputs from NDoH; and DfCDR</i></p>
10.2	<p>PROJECT GRIEVANCE MECHANISM:</p> <p>An accessible grievance mechanism shall be publicized, maintained and operated 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 also receive, register and address concerns and grievances related to sexual exploitation and abuse, sexual harassment in a safe and confidential manner, including through the referral of survivors to gender-based violence service providers.</p>	<p><i>Update and maintain throughout implementation.</i></p>	<p><i>DJAG; NDoH; and DfCDR</i></p>
CAPACITY SUPPORT (TRAINING)			
CS1	Implement capacity development program consisting of formal and on-the-job training and professional development activities.	<i>Throughout Project Implementation.</i>	<i>DJAG with inputs from NDoH; and DfCDR</i>
CS2	PCU and CMU staff and other relevant implementing support staff responsible for the Project to receive training on the Project's ESF instruments, CoC and provisions to prevent SEA/SH, the relevant requirements of the SA/MP, LMP and SEP, GRM and CoESP, and the roles and responsibilities in the ESF implementation.	<i>Throughout Project Implementation.</i>	<i>DJAG with inputs from NDoH; and DfCDR</i>
CS3	Implementing Partners and Contractors to receive training on the relevant aspects of the Project ESF instruments and relevant ESHS requirements.	<i>Prior to work commencing, throughout Project implementation.</i>	<i>DJAG; NDoH; and DfCDR</i>