

**Economic Commission of West African States  
(ECOWAS)/West African Health Organization  
(WAHO)**

**Sub-Saharan Africa Women's Empowerment  
and Demographic Dividend Plus Project  
(SWEDD+) P176693**

**Draft for Negotiation**

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

**27 June 2023**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Economic Commission of West African States (ECOWAS) (the Recipient) shall implement the Sub-Saharan Africa Women's Empowerment and Demographic Dividend Plus Project (SWEDD+) (the Project), with the involvement of the West African Health Organization (WAHO), and the Department of Human Development and Social Affairs (DHDSA)) 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 (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 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 and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through the Projects Management Unit in WAHO and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient, through the Director General of WAHO. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</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 E&amp;S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism including cases of sexual exploitation and abuse, sexual harassment (SEA/SH) and child abuse.</p>	<p>Submit biannual and annual reports to the Association throughout Project implementation, commencing three months after the Effective Date. Submit each report to the Association no later than 14 days after the end of each reporting period.</p>	<p>Projects Management Unit (PMU) in the West Africa</p>
B	<p><b>INCIDENTS AND ACCIDENTS</b></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. Any notification of a SEA/SH incident will follow an information sharing protocol to respect the privacy, confidentiality and security of the survivor.</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>	<p>PMU</p>
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>	<p>Submit the monthly reports to the Association upon request.</p>	<p>PMU</p>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain a Projects Management Unit (PMU) with qualified staff and resources to support management of Environmental, Social, Health and Safety (ESHS) risks and impacts of the Project including a social specialist and a sexual exploitation and abuse/sexual harassment (SEA/SH) consultant. Recruit an environmental consultant as required . The Terms of Reference (TORs) and qualifications of all candidates will be subject to the Association’s no objection.</p>	<p>Maintain a PMU as set out in the financing agreement. Hire or appoint the social specialist and a SEA/SH specialist no later than three months after the Effective Date, and thereafter maintain these positions throughout Project implementation. The environmental consultant shall be recruited during Project implementation upon determination of need together with the Association.</p>	PMU
1.2	<p><b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <p>Prepare, consult upon, disclose, and adopt the Regional-Strategic Social Assessment (R-SSA) for activities under component 3, to be co-led with the Economic Community of Central African States (ECCAS), and in consultation with the participating countries. The TOR for the R-SSA shall be consistent with ESSs and subject to the Association’s no objection.</p>	<p>Prepare, consult upon, disclose, and adopt the Regional Strategic Social Assessment (R-SSA) prior the start of technical assistance activities under component 3, and the R-SSA shall thereafter be implemented throughout Project implementation.</p>	PMU
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, and code of conduct, 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. Supervise contractors throughout Project implementation.</p>	PMU Contractors
1.4	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the consultancies, studies, capacity building (including activities under component 3), training, and any other technical assistance activities under the Project, including, inter alia, social assessments related to policy reform or awareness raising, workshops and related events around supporting regional good practices around strengthening of national legal and policy frameworks, knowledge generation and exchange activities under component 3, are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs and the Regional-SSA. Thereafter ensure that the outputs of such activities comply with the terms of reference and Regional-SSA.</p>	<p>Throughout Project implementation.</p>	PMU
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Prepare, consult on, disclose, 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 (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>	Prepare, consult on, disclose, adopt the LMP prior to Project Effective Date and shall thereafter be implemented throughout Project implementation.	PMU
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Establish grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.	PMU
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
This standard is not relevant			
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>Incorporate measures to manage traffic and road safety risks in the Project Implementation Manual (PIM). The PIM shall be subject to the Association’s no objection.</p>	Incorporate measures to manage traffic and road safety risks in the Project Implementation Manual three months after the Effective Date.	PMU
4.2	<p><b>COMMUNITY HEALTH AND SAFETY</b></p> <p>Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, the behavior of Project workers, response to emergency situations, the spread of communicable disease, sexual exploitation and abuse/sexual harassment (SEA/SH), and include mitigation measures in the PIM. The PIM shall be subject to the Association’s no objection.</p>	Incorporate measures to manage community health and safety risks in the PIM three months after Effective Date.	PMU
4.3	<p><b>SEA AND SH RISKS</b></p> <p>Incorporate measures to manage SEA/SH risks in the Project Implementation Manual in, as per the LMP and the operationalization of the SEA/SH grievance process as per the Stakeholder Engagement Plan.</p>	Incorporate measures to manage SEA/SH risks in the Project Implementation Manual by the Effective Date.	PMU
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>This standard is not relevant as this project is not expected to require any land acquisition nor cause any physical or economic displacement.</p>		
<p><b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b></p>		
<p>This standard is not relevant. The proposed project will not finance any activity that would impact biodiversity and/or living natural resources.</p>		
<p><b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b></p>		
<p>This standard is not currently relevant as the project is not being implemented in areas where Indigenous Peoples/Sub-Saharan Historically Underserved Traditional Local Communities are present or in areas to which they have a collective attachment.</p>		
<p><b>ESS 8: CULTURAL HERITAGE</b></p>		
<p>This standard is not currently relevant . There are construction activities anticipated.</p>		
<p><b>ESS 9: FINANCIAL INTERMEDIARIES</b></p>		
<p>Not relevant as there are no financial intermediaries in the project</p>		
<p><b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b></p>		
<p>10.1 <b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b>                      Prepare, consult on, disclose, 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, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation, including for TA activities under component 3.</p>	<p>Prepare, consult on, disclose, adopt the SEP prior to Effective Date, and thereafter implement the SEP throughout Project implementation.</p>	<p>RCU</p>
<p>10.2 <b>PROJECT GRIEVANCE MECHANISM</b>                       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.                       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>Establish the grievance mechanism, including the GM to address SEA/SH incidents, no later than three months after Project Effective Date, and thereafter maintain and operate the mechanism throughout Project implementation.</p>	<p>RCU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Any project related grievances prior to the operationalization of the project level GM, will be handled by the PIU and will make available and publicize multiple channels for stakeholders to submit grievances and questions.		
<b>CAPACITY SUPPORT</b>			
CS1	<p>Conduct training for PMU staff, stakeholders, communities, Project workers on, but not limited to:</p> <ul style="list-style-type: none"> <li>• Stakeholder mapping and engagement</li> <li>• Specific aspects of environmental and social assessment</li> <li>• Emergency preparedness and response</li> <li>• Community health and safety</li> <li>• SEA/SH risks and management</li> <li>• Exclusion risks, especially for vulnerable and disadvantaged groups (including for component 3 technical assistance activities)</li> <li>• Grievance management and monitoring, including for handling SEA/SH complaints</li> <li>• Reporting and monitoring</li> <li>• Labor risks and management, including labor GM, Codes of Conduct</li> <li>• Emergency reporting and management</li> <li>• Training on providing technical assistance and identifying and managing risks under component 3 and preparation and implementation of the R-SSA</li> </ul>	Training to start within the first quarter of project Effective Date	PMU Project workers
CS2	Training for Project workers on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.	Training to start within the first quarter of project Effective Date	PMU Project workers