

**THE SECRETARIAT OF THE SOUTHERN  
AFRICAN DEVELOPMENT COMMUNITY (SADC)**

**Sustainable Groundwater Management in SADC  
Member States Project Phase 2 (P175355)**

**DRAFT**

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

**February 26, 2021**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Secretariat of the Southern African Development Community (SADC) (the **Borrower**) will implement the Sustainable groundwater management in SADC member states Project – Phase 2 (P175355) (the **Project**) with the involvement of SADC Member countries (Sub-grant recipients). The Cooperation in International Waters in Africa (CIWA) Trust Fund (*hereinafter the Fund*) has agreed to provide financing for the Project.
2. SADC 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. SADC 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 Plans (ESMP), and Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S documents.
4. SADC is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the sub-grant recipients referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Fund by the SADC as required by the ESCP and the conditions of the legal agreement, and the Fund will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the *Fund* and the SADC, 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, SADC will agree to the changes with the *Fund* 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 Fund and the SADC. The SADC 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 SADC 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
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Fund 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 documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	Quarterly reporting throughout Project implementation.	SADC-GMI
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly notify the Fund of any incident or accident related to the Project and its sub-projects which has, or is likely to have, a significant adverse effect on the environment, the affected communities, workers and/ or stakeholders.</p> <p>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.</p> <p>Subsequently, as per the Fund’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	Notify the Fund within 48 hours after learning of the incident or accident and prepare and submit a report, upon request no later than two weeks following the notification.	SADC-GMI
C	<p><b>SUB-GRANTEES MONTHLY REPORTS</b></p> <p>Prepare and submit to the SADC-GMI regular monitoring reports on the sub-project environmental, social, health and safety (ESHS) performance including but not limited to the progress of environmental and social assessments, status of preparation and implementation of E&amp;S instruments, stakeholder engagement activities, functioning of the sub-project level grievance mechanism(s), and submit these reports to the Fund upon request.</p>	Monthly	Sub-grantee

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>		
<p>1.1 <b>ORGANIZATIONAL STRUCTURE</b></p> <ol style="list-style-type: none"> <li>1) Prepare a ToR for the recruitment of an environmental and social specialist</li> <li>2) Include and maintain in the existing SADC-GMI organizational structure a qualified environmental and social specialist to support the management of E&amp;S risks. The resource will be supported by the temporary independent ESMF consultant until such time that the resource has familiarized him/herself with the project E&amp;S requirements.</li> </ol>	<ol style="list-style-type: none"> <li>1) 3 months after effectiveness</li> <li>2) An organizational structure including an environmental and social resource will be established within 12 months after Project effectiveness. The organizational structure, including the specialists, should be maintained throughout Project implementation.</li> </ol>	SADC-GMI
<p>1.2 <b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b></p> <ol style="list-style-type: none"> <li>1) Ensure that all subprojects are screened in accordance with the Environmental and Social Management Framework (ESMF) prepared for the Project, and that sub-project specific Environmental and Social Assessment (ESA) instruments, such as Environmental and Social Impact Assessments (ESIAs) and/or Environmental and Social Management Plans (ESMPs) relevant to the scale and impacts of the sub-project activities are prepared based on the screening process, in accordance with the ESSs, the ESMF, and World Fund Environmental, Health and Safety guidelines and other relevant Good International Industry Practice (GIIP).</li> <li>2) Where a sub-project supports land acquisition, restrictions on land use and/or involuntary resettlement activities, conduct a social, legal and institutional assessment under ESS1, in order to identify potential economic and social risks and impacts of the sub-project implementation, and appropriate measures to minimize and mitigate them, in particular those that affect poor and vulnerable groups.</li> </ol>	<ol style="list-style-type: none"> <li>1) Prior to undertaking the sub-project throughout the Project implementation.</li> <li>2) Prior to sub-project implementation</li> </ol>	SADC-GMI Sub-grantees

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>1) Finalize, consult, disclose, and implement the Environmental and Social Management Framework (ESMF) and Stakeholder Engagement Plan (SEP) that has been prepared for the Project, in a manner acceptable to the Fund.</p> <p>2) Prepare and submit for Fund approval a sub-grant manual for the innovation technologies component of this project to include environmental and social requirements for sub-projects.</p>	<p>1) Prior to appraisal and thereafter throughout the Project implementation</p> <p>2) 6 months after effectiveness</p>	SADC-GMI
1.4	<p><b>MANAGEMENT OF SUB-GRANTEES</b></p> <p>1) Establish and implement an evaluation criteria and reporting format for sub-grantees E&amp;S performances and incorporate in the sub-grant manual.</p> <p>2) Incorporate the relevant aspects of the ESCP and sub-grant manual E&amp;S requirements into all agreements with the sub-grantee.</p> <p>3) Regularly monitor compliance with the specifications of the respective sub-projects.</p>	<p>1) 8 months after project effectiveness</p> <p>2) Prior to engagement and disbursement of funds to the sub-grantees</p> <p>3) Throughout project implementation.</p>	SADC-GMI
1.5	<p><b>PERMITS, CONSENTS AND AUTHORIZATIONS:</b></p> <p>Assist sub-grantees to obtain, when required, or ensure all permits, consents, and authorization that are applicable to each sub-project in the relevant SADC country are obtained before implementation of the sub-project.</p>	<p>1) Prior to implementation of sub-project</p>	SADC-GMI/ Sub-grantees
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>1) Develop, maintain and implement, throughout the Project a labor management procedure (LMP) at the SADC-GMI level and SADC Code of Conduct consistent with the applicable national legislation in the relevant SADC country and ESS2, and ensure they are available to Project workers.</p> <p>2) Develop maintain and implement at sub-project level standalone labor management plans (LMP) or incorporate labor conditions consistent with the ESMF in the sub-project specific ESMPs consistent with the applicable national legislation in the relevant SADC country and ESS2, and ensure they are available to Project workers.</p> <p>3) The Labor management procedures and plans (LMP) will including the applicable requirements regarding non-discrimination and equal opportunity.</p>	<p>1) 3 months after effectiveness</p> <p>2) Prior to sub-project implementation and thereafter throughout implementation</p>	<p>SADC-GMI</p> <p>Sub-grantees</p>
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>1) Establish, maintain, and operate a grievance mechanism as part of the Labor Management Procedure for SADC-GMI, consistent with ESS2.</p> <p>2) Establish, maintain, and operate a grievance mechanism as part of the Labor Management Procedure at sub-project level, consistent with ESS2.</p>	<p>1) 3 months after effectiveness and maintained throughout Project implementation.</p> <p>2) Grievance mechanism operational prior engaging Project workers and maintained throughout Project implementation.</p>	<p>SADC-GMI</p> <p>Sub-grantees</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>1) Establish minimum occupational, health and safety measures for inclusion in the sub-grant manual consistent with the ESMF and adherence by the sub-grantees.</p> <p>2) Prepare, adopt and implement occupational, health and safety (OHS) measures at sub-project level as specified in the ESMF, the World Fund Group’s Environmental Health and Safety Guidelines (EHSGs) and applicable laws in the specific SADC country.</p>	<p>1) 6 months from effectiveness</p> <p>2) Prior to sub-project implementation and thereafter throughout implementation</p>	<p>SADC-GMI</p> <p>Sub-grantees</p>
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b></p> <p>1) Relevant aspects of ESS3 shall be considered, as needed, under action 1.2 above, including, inter alia, measures to design and implement sub-projects with efficiency measures for consumption of energy, water and raw materials.</p> <p>2) Undertake relevant assessments and studies to determine potential impacts of water abstraction on downstream users.</p> <p>3) Prepare and implement a waste management tool, as part of the ESMF, to ensure proper management of any non-hazardous and hazardous waste.</p>	<p>Prior to sub-project implementation</p>	<p>Sub-grantees</p>
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>COMMUNITY HEALTH AND SAFETY:</b></p> <p>Prepare, adopt, and implement measures and action consistent with the ESMF to assess and manage specific risks and impacts to the community arising from sub-project activities and include these measures in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Fund.</p>	<p>Prior to sub-project implementation and thereafter throughout implementation</p>	<p>Sub-grantees</p>

4.2	<p><b>GBV AND SEA RISKS:</b></p> <ol style="list-style-type: none"> <li>1) As part of the sub-project screening process, assess the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA) and where relevant, ensure site specific ESMPs include proportionate mitigation measures</li> <li>2) Identify mitigation measures as part of the ESMP to manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA)</li> <li>3) All contracts to include a Code of Conduct for workers with a clear position statement on SHA and GBV including detailing disciplinary action to be taken for non-compliance.</li> </ol>	Prior to sub-project implementation and thereafter throughout implementation	SADC-GMI  Sub-grantees
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	NOT RELEVANT	NOT RELEVANT	NOT RELEVANT
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p><b>BIODIVERSITY RISKS AND IMPACTS:</b></p> <p>Sub-project site selection and screening shall identify potential biodiversity sensitivities within the sub-project area and determine whether avoidance is possible or recommend further assessment of impacts under action 1.2 and include mitigation measures in the sub-project ESMP and/or project design considerations.</p>	Prior to sub-project implementation and thereafter throughout implementation	SADC-GMI Sub-grantees
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			



7.1	<p><b>INDIGENOUS PEOPLES PLAN:</b></p> <p>1) Sub-project site selection and screening shall identify if Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities (as they may be referred to in the national context) are present in, or have collective attachment to a proposed project area and promote equitable access to benefits and to avoid and/or mitigate adverse project impacts as per the requirements of ESS7</p> <p>2) If relevant, prepare, adopt, and implement Indigenous Peoples Plans (IPPs) consistent with the requirements of ESS7, in a manner acceptable to the Fund.</p>	<p>1) Prior to sub-project implementation</p> <p>2) If relevant, Submit the respective IPP for the Fund’s approval prior to the carrying out of any activity that requires the preparation of an IPP. Once approved, implement the IPP throughout Project implementation.</p>	SADC-GMI and Sub-grantees
7.2	<p><b>GRIEVANCE MECHANISM:</b></p> <p>If relevant, prepare, adopt, and implement the arrangements for the grievance mechanism for indigenous people, and further describe such arrangements in the respective IPPs (if the grievance mechanism is distinct from the one established under ESS10).</p>	<i>Prior to the carrying out of any activity that requires the preparation of an IPP.</i>	Sub-grantees
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<p><b>CHANCE FINDS:</b></p> <p>Adopt and implement the chance finds procedure described in the ESMF and ESMP developed for the Project.</p>	Throughout Project implementation	Sub-grantees
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
9.1	NOT RELEVANT	NOT RELEVANT	NOT RELEVANT
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b></p> <p>1) Prepare, disclose and adopt a draft Project Stakeholder Engagement Plan (SEP)</p> <p>2) Update, redisclose and implement the Project Stakeholder Engagement Plan (SEP).</p> <p>3) Prepare, implement and regularly update a sub-project SEP in accordance to the requirements of the ESMF and ESS10 and in line with the project SEP.</p>	<p>1) Prior to project appraisal</p> <p>2) 3 months after effectiveness</p> <p>3) Prior to sub-project implementation and thereafter throughout implementation</p>	<p>SADC-GMI</p> <p>Sub-grantees</p>
10.2	<p><b>PROJECT GRIEVANCE MECHANISM:</b> Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP and the ESMF.</p>	<i>Prior to sub-project implementation and thereafter throughout implementation</i>	SADC-GMI and Sub-Grantees

CAPACITY SUPPORT (TRAINING)			
CS1	<ol style="list-style-type: none"> <li>1) Finalize internal capacity needs assessment and training development and E&amp;S handover plan</li> <li>2) SADC-GMI capacity building on World Fund ESF</li> <li>3) Undertake an organizational capacity assessment of sub-grantees before project approval and implementation to determine existing capacity for implement and managing project E&amp;S risks and impacts and determine areas which requires strengthening</li> <li>4) Develop a training and capacity strengthening program for sub-grantees.</li> </ol>	<ol style="list-style-type: none"> <li>1) 6 months after project implementation</li> <li>2) 3 months after engagement of SADC-GMI E&amp;S resource</li> <li>3) Prior to sub-grant project approval</li> <li>4) One month after approval sub-grant</li> </ol>	SADC-GMI/ independent ESMF consultant
CS2	<p>Training topics for personnel involved in Project implementation (stakeholders, communities, project workers) will include, among others:</p> <ol style="list-style-type: none"> <li>1) Community Health and Safety during construction</li> <li>2) Grievance Redress Mechanism and Stakeholder Engagement</li> <li>3) Content of the Code of Conduct and worker contracts</li> </ol>		