

**SOUTHERN AFRICAN DEVELOPMENT
COMMUNITY SECRETARIAT**

SADC Regional Statistics Project (P175731)

Draft

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

April 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Southern African Development Community (SADC) (hereinafter the Recipient) will implement the SADC Regional Statistics Project (the Project), with the involvement of the SADC Secretariat, as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide the 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 and the Project Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
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, 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 SADC 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 Executive Secretary of SADC Secretariat. 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.</p>	<p>Quarterly reports to the Association throughout Project implementation, commencing 3 months after the Effective Date. Submit each report to the Association no later than 7 days after the end of each reporting period.</p>	<p>SADC Project Coordinator, Project Implementation Unit and Officer Responsible for Environment and Natural Resources and Officer Responsible for Human Resources</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, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury [specify other examples of incidents and accidents, as appropriate for the type of operation]. 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 (24 hours’ notice for SEA/SH incidents) after learning of the incident or accident.</p> <p>Provide subsequent report to the Association within a timeframe (7 days) acceptable to the Association</p>	<p>SADC Project Coordinator, Project Implementation Unit and Officer Responsible for Environment and Natural Resources and Officer Responsible for Human Resources</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Overall Coordination of the Project shall be carried out by the Southern African Development Community and its counterparts in the National Statistics Offices of the SADC Partner States.</p> <p>Maintain the SADC Project Implementation Unit with qualified staff and resources to support management of ESHS risks and impacts of the Project including the Officer Responsible for Environment and Natural Resources.</p>	<p>Maintain the PIU as set out in the legal agreement.</p> <p>Appoint the Officer Responsible for Environment and Natural Resources by project Effective Date and thereafter maintain the position throughout Project implementation.</p>	<p>SADC Project Coordinator, SADC Project Implementation Unit and SADC Officer Responsible for Environment and Natural Resources</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>a) Adopt and implement a Stakeholder Engagement Plan, including project GRM</p> <p>b) Adopt and implement Labor Management Procedures (LMP) including SEA/SH measures and Labor Grievance Mechanism consistent with ESS2 and ESS4, and COVID-19 measures consistent with ESS4, including through existing SADC Human Resources policies and Staff Rules and Regulations, and where necessary, including measures for contractors, consultants or other non-SADC staff that may be recruited by SADC for project activities</p>	<p>a) Draft SEP prepared for appraisal, shall be disclosed, consulted, and finalized no later than 2 months after the Effective Date, updated as necessary, and maintained throughout Project implementation.</p> <p>b) LMP shall be prepared, disclosed, and finalized no later than 2 months after the Effective Date, and implemented throughout Project implementation</p>	<p>Project Coordinator, Project Implementation Unit and Officer Responsible for Environment and Natural Resources</p>
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that Environmental and Social risks identified in the implementation of SADC project-related activities are managed through the appropriate instruments required under this ESCP.</p> <p>Ensure that Terms of Reference (TOR) for studies, advisory services, regional and national meetings/workshops and the outputs of any technical assistance provided under the Project are prepared and/or delivered in a manner acceptable to the Association and duly incorporate and take into consideration the Environmental and Social Standards to ensure activities are materially consistent with ESSs. The ToRs shall be submitted for the Bank review.</p> <p>The ToR shall account for, among other environmental and social risks and impacts, the social risks related to data privacy and security, exclusion and discrimination of vulnerable individuals and groups, understanding of access barriers and design of measures to avoid discrimination and provide equal or at least improved access to all Disadvantaged or Vulnerable Individuals and Groups as defined in the SEP, and include national and sectoral challenges to data access.</p>	<p>Throughout Project implementation.</p>	<p>Project Coordinator, Project Implementation Unit and Officer Responsible for Environment and Natural Resources</p>
<p>ESS 2: LABOR AND WORKING CONDITIONS</p>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>The Southern African Development Community shall ensure a non-discriminatory, decent work environment consistent with ESS2, including through SADC Staff Rules and Regulations; ensuring that the Project staff and Consultants adhere to the professional code of conduct as part of the Staff Rules and Regulations of SADC, and that such rules are included in all Project contracts. Adopt and implement an LMP where necessary to cover non-SADC staff and/or any ESS2 issues not fully addressed in SADC policies.</p> <p>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, and grievance arrangements for Project workers.</p>	<p>1) The LMP that incorporates SADC rules and regulations shall be operational for engaging the Project workers and shall be maintained throughout the Project implementation.</p> <p>LMP shall be prepared, disclosed, and finalized no later than 2 months after the Effective Date, and maintained throughout Project Implementation.</p>	Project Coordinator, Project Implementation Unit and Officer Responsible for Human Resources
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Adopt and operate a workers grievance mechanism where workplace concerns shall be addressed in line with the provisions of the SADC Staff Rules and Regulations, provisions of ILO and relevant states labor laws (where applicable), and in a manner consistent with ESS2 for Project workers.</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	<p>Establish grievance mechanism prior to engaging the Project workers and shall be maintained throughout the Project implementation</p>	Project Coordinator, Project Implementation Unit and Officer Responsible for Human Resources, National Statistics Offices (NSOs)
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>E-waste management measures as per the SADC Asset Disposal Policy shall be used for the Project, including resource efficiency and pollution prevention and management measures consistent with ESS3 and adequate mitigation measures included, in a manner acceptable to the Association.</p>	<p>Adopt e-waste management measures included in the SADC Asset Disposal Policy as part of the Operation Manual prior to project implementation</p>	Project Coordinator, Project Implementation Unit and Officer Responsible for Environment and Natural Resources
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>COMMUNITY HEALTH AND SAFETY</p> <p>SADC shall implement measures and actions to assess, manage specific health risks and impacts to the community arising from Project activities as per SADC Human Resource Policies and regulations, including but not limited to transmission of COVID-19 during consultations.</p>		Project Coordinator, Project Implementation Unit and Officer Responsible for Human Resources/health

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, transmission of COVID-19 during consultations, behavior of Project workers, and include mitigation measures in the LMP.	The measures, in particular to SADC Guidelines on COVID regarding travel and Meetings, shall be operational prior to Project workers undertaking any activities involving the community and shall be maintained throughout the Project implementation Same timeframe as for the adoption and implementation of the LMP.	
4.3	SEA AND SH RISKS The Southern African Development Community shall implement measures to address Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in the workforce consistent with ESS2, including through SADC Staff Rules and Regulations. SADC shall include in all Project worker contracts a code of conduct satisfactory to the Association covering worker behaviour related to SEA/SH.	Measures to address SEA/SH including codes of conduct as per SADC policy shall be operational prior to engaging the Project workers and shall be maintained throughout the Project implementation.	Project Coordinator, Project Implementation Unit and Officer Responsible for Human Resources
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			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
NOT RELEVANT			
ESS 8: CULTURAL HERITAGE			
NOT RELEVANT			
ESS 9: FINANCIAL INTERMEDIARIES			
NOT RELEVANT			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE: The SADC has prepared, consulted, adopted and disclosed a Stakeholder Engagement Plan (SEP) as part of Project Appraisal consistent with ESS10, and shall implement it in a manner acceptable to the Association. The SEP shall be updated as required throughout Project implementation.		Project Coordinator, Project Implementation Unit and Officer Responsible for Environment and Natural Resources

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		Draft SEP prepared for appraisal, shall be disclosed, consulted, and finalized no later than 2 months after the Effective Date, updated as necessary, and maintained throughout Project implementation	
10.2	PROJECT GRIEVANCE MECHANISM: The SADC shall operationalize the grievance redress mechanism to receive and facilitate timely resolution of Project concerns from stakeholders as provided in the SEP.	GRM as per SADC HR Policy – Grievances, shall be operational no later than 2 months after Project effectiveness and implemented throughout Project implementation	Project Coordinator, Project Implementation Unit, Officer Responsible for Human Resources and NSOs
CAPACITY SUPPORT			
CS1	Develop and deliver training on the World Bank Environmental and Social Framework and the corresponding environmental and social documents developed for the Project, including relating to stakeholder engagement and SADC institutional and corporate policy frameworks and other implementation activities such as coordination, supervision, monitoring and reporting for the PIU and Member States NSOs.	To begin no later than 2 months after Project effectiveness and thereafter on an as needed basis.	Project Coordinator and Officer Responsible for Environment and Natural Resources NSOs