

# Consortium of Bangsamoro Civil Society, Inc.

No Bangsamoro Child Left Behind in the Bangsamoro Autonomous Region in  
Muslim Mindanao (BARMM)

P176749

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

October, 2022

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Consortium of Bangsamoro Civil Society (CBCS) (the “Recipient”) will implement the *No Bangsamoro Child Left Behind in the Bangsamoro Autonomous Region in Muslim Mindanao (BARMM) Project (P176749)* (hereinafter the “Project”). The World Bank, acting as the administrator of the Japan Social Development Fund, has agreed to provide US\$ 2,752,300 million 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 World Bank. The ESCP is a part of the Grant 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 World Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the World Bank.
4. As agreed by the World Bank 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 and the World Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the World Bank and the Recipient (represented by the Chairperson of CBCS). The Recipient shall promptly disclose the updated ESCP.

| MATERIAL MEASURES AND ACTIONS   |   | TIMEFRAME  | RESPONSIBLE ENTITY/AUTHORITY  |
|---------------------------------|---|--|---|
| <b>MONITORING AND REPORTING</b> |   |  |   |
| A                               | <p><b>REGULAR REPORTING</b></p> <p>The Recipient shall prepare and submit to the World Bank regular environmental and social monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to: (i) the implementation of the ESCP, (ii) status of preparation and implementation of E&amp;S documents required under the ESCP, (iii) stakeholder engagement activities and functioning of the grievance mechanism.</p>  | <p>Quarterly monitoring reports, and semi-annual reports starting from Project Effectiveness Date, throughout Project Implementation.</p>  | <p>Project Management Unit (PMU)/ Consortium of Bangsamoro Civil Society (CBCS)</p> |
| B                               | <p><b>INCIDENTS AND ACCIDENTS</b></p> <p>The Recipient shall promptly notify the World Bank 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 project workers. These incidents and accidents could be related but not limited to: safety and security, cases of sexual exploitation and abuse/sexual harassment (SEA/ SH), food poisoning, damage to the property of an individual or a community, discrimination (for example, discrimination against women, young people, people with disabilities, indigenous people groups and minority groups), the exclusion of vulnerable or disadvantaged individuals or groups, handling of Project-related complaints, as appropriate for the type of operation.</p> <p>The Recipient shall 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, upon the request of World Bank, the recipient shall prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p> | <p>Notify the World Bank no later than 48 hours after learning of the incident/accident.</p> <p>Ensure the provision of assistance to survivors of SEA / SH for medical care, psychosocial support and legal assistance by way of referral to relevant SEA/SH service providers in the Project area within 48 hours.</p> <p>This systematic reporting system shall remain in place throughout the Project implementation.</p> <p>A subsequent detailed report shall be prepared and provided within a maximum of 5 working days. The reporting of SEA / SH case reports shall be based on the principle of confidentiality and security of the survivor's identity and shall be kept in a secure location with limited access.</p> | <p>PMU/CBCS</p>   |

| MATERIAL MEASURES AND ACTIONS   |  | TIMEFRAME  | RESPONSIBLE ENTITY/AUTHORITY |
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| C   | <p><b>THIRD PARTY SERVICE CONTRACTORS' QUARTERLY REPORTS</b></p> <p>Quarterly monitoring report to the PMU/ CBCS, including the action plan of each month with inputs- outputs and outcomes to the World Bank in coordination with the MPHTE.</p>  | Quarterly  | PMU/CBCS                     |
| <b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b> |  |  |                              |
| 1.1   | <p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>The Recipient shall establish and maintain an organizational structure with the Project Management Unit (PMU) within the CBCS, qualified staff and resources to support management of E&amp;S risk of the project.</p> <p>The PMU shall recruit or designate an Environmental and Social (E&amp;S) specialist, to ensure the implementation of the E&amp;S instruments prepared under the Project. Additional E&amp;S consultants may be recruited/designated during project implementation, as may be deemed necessary by and agreed with the World Bank. The qualifications, experience, and terms of reference for the recruitment/ designation of all the Environmental and Social (E&amp;S) specialist/ consultants shall be approved by the World Bank.</p> <p>The Recipient shall ensure, through the Project coordinator, that the E&amp;S specialist carry out their missions relating to the E&amp;S management of the Project, including the prevention and management of the SEA/SH risks and impacts, and in accordance with the operation manual, consistent with ESSs and in a manner acceptable to the World Bank.</p> | <p>The PMU shall be set up no later than one month after the Project Effective Date. Key staff of the national PMU (including E&amp;S specialist) should be recruited/designated no later than the Project Effective Date.</p> <p>Organizational structure, including E&amp;S Specialist shall be maintained throughout Project implementation</p> | PMU/CBCS                     |

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| <p>1.2 <b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <p>The Recipient shall prepare, disclose, consult, adopt and implement the Environmental and Social Management Framework (ESMF) and screen any proposed Project activity in accordance with the ESMF to identify and assess the risks and potential negative environmental and social impacts of the Project, (including, inter alia, COVID-19 risks, security risks and SEA / SH), as well as appropriate mitigation measures. The ESMF will include annex on Labor Management Procedures (LMP)</p> <p>A particular emphasis shall be placed on consulting Indigenous Peoples (IP) groups to identify their needs and suggestions during the assessment and other vulnerable persons or groups to ensure the integration of their particular needs into the Project risks mitigation measures. An Indigenous Peoples Plan will be prepared and disclosed.</p> | <p>The ESMF (with annexes on LMP) shall be prepared, disclosed, consulted, and adopted before Project appraisal and implemented thereafter throughout Project implementation.</p> <p>The IPP will be prepared and disclosed before Project implementation.</p> | <p>PMU/ CBCS</p>             |

| MATERIAL MEASURES AND ACTIONS   | TIMEFRAME  | RESPONSIBLE ENTITY/AUTHORITY |
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| <p>1.3 <b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>The Recipient shall develop, disclose, consult upon, adopt and implement the following risk assessment and management tools and instruments, in accordance with the ESSs and in a manner acceptable to the World Bank:</p> <ul style="list-style-type: none"> <li>- Stakeholder Engagement Plan (SEP), including the Grievance Mechanism;</li> <li>- Environmental and Social Management Framework (ESMF) and, thereafter, draft, adopt, and implement the subproject Environmental and Social Management Plan (ESMP), as required. The ESMF will include annex on Labor Management Procedures (LMP)</li> <li>- Indigenous Peoples Plan (IPP)</li> <li>- others instruments as may be required, during implementation.</li> </ul> | <p>SEP shall be developed and disclosed before Project Appraisal.</p> <p>ESMF (with annex on LMP) shall be developed and disclosed before Project appraisal</p> <p>The IPP will be developed and disclosed before project implementation</p> <p>All these instruments shall be implemented throughout the Project implementation</p> | <p>PMU/ CBCS</p>             |
| <p>1.4 <b>MANAGEMENT OF THIRD-PARTY SERVICE CONTRACTORS</b></p> <p>The Recipient shall incorporate the relevant aspects of the ESCP, including the relevant E&amp;S documents and/or plans, e.g. ESMF (LMP annex) and IPP into the ESHS specifications of the procurement documents with third party service contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts.</p>   | <p>During the preparation of the procurement documents and before the start of the relevant services. Implementation and maintenance of these measures throughout Project implementation. Supervise third party service contractors throughout Project implementation.</p>   | <p>PMU/CBCS</p>              |

| MATERIAL MEASURES AND ACTIONS              |  | TIMEFRAME  | RESPONSIBLE ENTITY/AUTHORITY                 |
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| 1.5  | <p><b>TECHNICAL ASSISTANCE</b></p> <p>The Recipient shall ensure that consultancies, studies, capacity and skills building, training and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the World Bank, which incorporate the relevant ESSs requirements.</p> <p>Ensure that any outputs of technical assistance activities are consistent with the ESSs.</p>     | Throughout the Project implementation  | PMU/CBCS                                     |
| <b>ESS 2: LABOR AND WORKING CONDITIONS</b> |  |  |  |
| 2.1  | <p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>The Recipient shall develop, adopt, and implement the Labor Management Procedures (LMP) – as an annex to the ESMF, prepared for the Project (including, inter alia, the prohibition of SEA / SH, child labor, and forced labor) in accordance with the requirements of ESS2 and in a manner acceptable to the World Bank.</p>   | The LMP (annexed to the ESMF) shall be developed, adopted and disclosed before Project appraisal and implemented throughout Project Implementation | PMU/ CBCS                                    |
| 2.2  | <p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>The Recipient shall establish, maintain, and operate a grievance mechanism (GM) for Project workers, sensitive to SEA / SH, as described in the LMP annex in the ESMF and consistent with ESS2 and the applicable national legislation.</p> <p>The Recipient shall ensure that workers who use this GM are not subjected to any form of discrimination or retaliation from employers.</p> | The GM shall be established, and operationalized prior to engaging Project workers, and shall be maintained throughout the Project implementation. | PMU/ CBCS<br>Third party service contractors |

| MATERIAL MEASURES AND ACTIONS |   | TIMEFRAME   | RESPONSIBLE ENTITY/AUTHORITY   |
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| 2.3                           | <p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>The Recipient shall prepare, adopt, and implement occupational, health and safety (OHS) measures specified in the ESMP, all in accordance with national requirements and good international industry practice, and ESS2 and in a manner acceptable to the World Bank.</p>  | Throughout Project Implementation                                     | PMU/ CBCS  |
| 2.4                           | <p><b>EMERGENCY PREPAREDNESS AND RESPONSE</b></p> <p>Emergency preparedness and response are collective and inclusive. All the emergencies include conflict and natural disaster, including fire, pandemic response in the post-pandemic situation, and post corona life. The Recipient shall, adopt and implement emergency preparedness and response measures and reflect those measures in the ESMF and the Project Operations Manual.</p> <p>The Recipient shall ensure that the Project contractors prepare, adopt, and implement an emergency preparedness and response plan, that considers existing regulatory frameworks (e.g. for schools) adapted to project activities. The emergency situations of each sub-project, in particular community-driven measures, and community outreach activities, shall be identified in the ESMF, as well as the measures for their prevention and management shall be incorporated in the Project Operations Manual.</p> <p>The Recipient shall immediately report any major emergency in accordance with section B of this ESCP. In addition, the recipient shall report the summary of the implementation of emergency preparedness and response measures as part of the regular reporting in accordance with section A of this ESCP.</p> | Prior to the implementation of activities and throughout the Project. | <p>PMU/CBCS</p> <p>The provincial coordinators recruited under CBCS for this project will be responsible for the early warning and early response tasks. CBCS secretariat will form the emergency response committee in liaison with BARMM and other agencies for the direction for providing support.</p> |



| ESS 4: COMMUNITY HEALTH AND SAFETY  |  |  |
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| 4.1   | <p><b>COMMUNITY HEALTH AND SAFETY:</b></p> <p>The Recipient shall prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities, and include these measures in the ESMFs to be prepared in accordance with the ESMF, in a manner acceptable to the World Bank.</p> <p><i>Risks associated with the spread of COVID-19</i></p> <p>The Recipient shall develop, disclose, consult upon, adopt, and implement the action plan as part of the ESMF for the prevention and management of risks related to the spread of COVID-19, prepared in order to manage this risk on all Project activities.</p> <p><i>Security risks</i></p> <p>The Recipient shall assess the security risks in the ESMF, and, thereafter, develop, adopt and implement security measures/ protocols prepared for the Project, to manage the risks of recurring security incidents and threats under the Project, all in accordance with the requirements of ESS 1 and ESS 4 and in a manner acceptable to the World Bank.</p> | <p>Prior to the start of works. These measures shall be implemented throughout the implementation of the Project.</p> <p>PMU/ CBCS</p> |
| 4.2   | <p><b>SEA/SH RISKS:</b></p> <p>CBCS will work with schools to prepare and implement measures to monitor SEA/SH risks in schools and address SEA/SH risks that may arise during Project implementation.</p>   | <p>Through the project implementation</p> <p>PMU/ CBCS.</p>  |
| ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT          |  |  |
|   | Currently not relevant   |  |
| ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES |  |  |
|   | Currently not relevant   |  |

| <b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b> |   |  |                  |
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| 7.1   | <p><b>INDIGENOUS PEOPLES PLANNING PLAN:</b></p> <p>Prepare, adopt, and implement an Indigenous Peoples Plan (IPP) that has been prepared for the Project and ESS7, in a manner acceptable to the World Bank.</p>    | <p>IPP will be prepared for the World Bank's approval and disclosed prior to project implementation (specifically, the carrying out of any activity that requires the preparation of an IPP). The IPP will be implemented throughout Project implementation.</p> | <p>PMU/ CBCS</p> |
| 7.2   | <p><b>GRIEVANCE MECHANISM (GM):</b></p> <p>Ensure that the GM established for the project (under ESS10) is culturally appropriate and accessible to affected indigenous people (IPs), consistent with the ESS7.</p> | <p>The project GM shall be operationalized by Project Effectiveness Date, and thereafter shall be maintained and remain operational throughout Project implementation.</p>   | <p>PMU/ CBCS</p> |
| <b>ESS 8: CULTURAL HERITAGE</b>   |   |  |                  |
|   | <p>Currently not relevant</p>   |  |                  |
| <b>ESS 9: FINANCIAL INTERMEDIARIES</b>  |   |  |                  |
|   | <p>Currently not relevant</p>   |  |                  |
| <b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>  |   |  |                  |

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| <p>10.1</p>                               | <p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b></p> <p>The Recipient shall prepare, disclose, consult upon, adopt, and implement Stakeholder Engagement Plan (SEP) prepared for the Project, including 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, all in accordance with ESS10 and in a manner acceptable to the World Bank.</p>   | <p>SEP shall be prepared and disclosed prior to Project Appraisal<br/>SEP shall be implemented throughout Project implementation</p>   | <p>PMU/ CBCS</p> |
| <p>10.2</p>                               | <p><b>PROJECT GRIEVANCE MECHANISM:</b></p> <p>The Recipient shall, establish, disclose, maintain and operate an accessible GM, in order to receive and facilitate the resolution of concerns and grievances related to the entire Project, promptly and effectively, in a transparent, culturally appropriate and readily accessible manner to all Project-affected-parties, at no cost and without retribution, including concerns and grievances filed anonymously, all in accordance with the ESS 10.</p> <p>The GM shall also receive, register, and address concerns and complaints related to SEA / SH in a safe and confidential manner, with specific entry points for survivors and ensure a referral system to provide assistance to survivors as required, through identified GBV service providers in the Project area.</p> <p>The GM shall also ensure that the local populations affected by the Project are aware of the existence of this mechanism and know the procedures for filing and handling complaints and other remedies.</p> | <p>The project GM shall be operationalized no later than one month after Project Effectiveness Date, and thereafter shall be maintained and remain operational throughout Project implementation</p> | <p>PMU/ CBCS</p> |
| <p><b>CAPACITY SUPPORT (TRAINING)</b></p> |  |  |                  |

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| CS1 | <p>Training may be required for staff, stakeholders, communities and Project workers on:</p> <ul style="list-style-type: none"> <li>• stakeholder mapping and engagement</li> <li>• environmental and social assessment</li> <li>• emergency preparedness and response</li> <li>• community health and safety</li> <li>• Documentation</li> <li>• Monitoring &amp; Evaluation</li> </ul> | <p>No later than three months after Project Effectiveness date; and throughout Project Implementation, as needed</p> | <p>PMU/ CBCS</p> |
| CS2 | <p>Training may be required for staff, stakeholders, communities and Project workers on:</p> <ul style="list-style-type: none"> <li>• Basic Occupational Health and Safety training</li> <li>• Environment, Health and Safety Training</li> <li>• Emergency Prevention and Preparedness Training</li> <li>• Emergency Response Training</li> </ul>                                       | <p>No later than three months after Project Effectiveness date; and throughout Project Implementation, as needed</p> | <p>PMU/ CBCS</p> |