

Federal Democratic Republic of Ethiopia, Ministry of Education

**Additional Financing to General Education Quality Improvement  
Program for Equity (AF to GEQIP-E) for Refugees Integration  
(P168411)**

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

**January 2021**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Federal Democratic Republic of Ethiopia (Recipient) will implement the Investment Project Financing component of the Additional Financing to General Education Quality Improvement Program for Equity (AF to GEQIP-E) for Refugees Integration Project (the **Project**), with the involvement of the Ministry of Education (MoE) and Administration for Returnee and Refugee Affairs (ARRA). The International Development Association (hereinafter the Association) has 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 Stakeholder Engagement Plans (SEP), 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 or Administration 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 will 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, through the MoE, will agree to the changes with the Association 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 Association and the MoE. 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, which may include specify risks and impacts that are relevant to the Project, such as environmental, Social, health, and safety impacts, labor influx, gender-based violence.

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 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 documents required under the ESCP, stakeholder engagement plan, functioning of the grievance mechanism, and incidents of gender-based violence.</p>	Quarterly throughout Project implementation.	MoE
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>1. 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 injuries and fatalities.</p> <p>2. All other, minor incidents must be included in the quarterly report to the Association.</p>	<p>1. Notify the Association within 48 hours after becoming aware of the incident or accident.</p> <p>3. Quarterly, as part of reports under action A of this ESCP</p>	MoE
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.1 <b>ORGANIZATIONAL STRUCTURE</b>                      MoE shall establish and maintain an organizational structure with qualified environmental and social risk management staff and resources to manage E&amp;S risks.</p> <p>MoE shall ensure that Regional Refugee Integration Facilities and other entities implementing the Project also maintain an organizational structure with qualified social risk management staff and resources to manage E&amp;S risks.</p> <p>One environmental and one social specialist shall be employed at MoE and two environmental and social specialists in Gambella and Benishangul-Gumuz Refugee Integration facilities shall be hired.</p> <p>Other Program beneficiary regional and each beneficiary Woredas shall assign qualified environmental and social specialists/focal persons who can provide environmental and social risk management oversight.</p>	<p>An organizational structure, including functional environmental and social risk management system, shall be established within 30 days after Project effectiveness.</p> <p>The organizational structure shall be maintained throughout Project implementation.</p>	<p>MoE</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.2 <b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b></p> <p>2. Undertake site-specific environmental and social risk screening and impact assessments for TAs in accordance with the ESSs. Prepare and disclose environmental and social management plans for project activities by region including a site-specific risk assessment covering issues of GBV/SEA, security, community health campaign and a localized stakeholder mapping and engagement plan.</p> <p>3. Conduct due diligence assessment for completed and ongoing high schools and implementation of identified mitigation measures, if any, to address any legacy issues related to land/construction by UNICEF and Ethiopian Orthodox Church - Development and Inter-Church Aid Commission (EOC-DICAC). in refugee areas in which the IPF TA will be extended.</p>	<p>2. Prior to initiation of the IPF component activities.</p> <p>3. Within six months of Effectiveness: complete assessment and present report to the Association.</p>	

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.3 <b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>Screen any proposed the IPF component activities in accordance with the Environmental and Standards (ESSs) and implement the the IPF component activities as required by ESSs, in a manner acceptable to the Association.</p> <p>Prepare, consult upon, disclose, adopt, maintain, and implement E&amp;S tools and instruments applicable to the IPF Component of the Program in accordance with the ESSs and in a manner acceptable to the Association, including but not limited to the following:</p> <ul style="list-style-type: none"> <li>- Gender-Based Violence (GBV) Action Plan;</li> <li>- Labor Management Procedures (LMP) including a workers' Grievance Redress Mechanism;</li> <li>- Stakeholder Engagement Plan (SEP) including a community Grievance Redress Mechanism;</li> <li>- Procedures for screening of Environmental &amp; Social Screening risks and impacts of the IPF component activities;</li> <li>- Organizational structure and resource planning; and</li> <li>- Monitoring and reporting system;</li> </ul> <p>These instruments shall be disclosed in country and on the website of MoE</p>	<p>Site-specific environmental and social risk management tools to be prepared, consulted upon, disclosed, and adopted prior to implementation of the IPF component activities. Thereafter, tools and instruments to apply throughout Project implementation.</p>	<p>MoE</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p><b>MANAGEMENT OF CONTRACTORS</b> MoE shall incorporate the relevant aspects of the ESCP, including the relevant E&amp;S documents and/or plans, and the Labor Management Procedures, into the ESHS specifications of the procurement documents with contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts.</p> <p>Screen and manage subcontracted CSOs on social risk management capacity, including mitigation of gender-based violence, via a standardized screening form agreed with the Association.</p>	<p>Prior to the preparation of procurement documents. Supervise contractors throughout Project implementation.</p> <p>Prepare screening form within three months after Project effectiveness and prior to any CSO bidding process.</p>	MoE
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b> Implement the LMP that have been developed and adopted for the Project in accordance with ESS2 and in a manner acceptable to the Association.</p> <p>Ensure that Project employees as well as contracted institutions comply with the LMP.</p>	<p>Adopt prior to Appraisal and implement throughout Project implementation.</p> <p>Throughout Project implementation.</p>	MoE
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b> Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Prior to engaging Project workers	MoE
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b> Prepare, adopt, and implement occupational, health and safety (OHS) measures in accordance with ESMG and ESS2. Ensure a non-discriminatory, decent work environment, including by ensuring that all workers adhere to the ESHS code of conduct.</p>	OHS measures to be adopted prior to engaging Project workers and carried out throughout Project implementation	MoE
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	. No pollution is anticipated as a result of the IPF component of the Program. This standard is not relevant for the IPF component of the Program		

<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1			
4.2	<p><b>COMMUNITY HEALTH AND SAFETY:</b> Prepare and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities including but not limited to the behavior of Project workers, risks of labor influx, and response to emergency situations.</p> <p>Put in place measures and actions to assess and manage specific risks and impacts related to conflicts</p>	Prior to the commencement of IPF component activities	MoE
4.3	<p><b>GBV AND SEA RISKS:</b> Adopt and implement a stand-alone Gender-Based Violence Action Plan (GBV Action Plan), to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA) for the Project.</p> <p>Develop GBV/SEA Code of Conduct, including for teachers, employees and workers, including sanctions.</p>	Prior to Project effectiveness	MoE
4.4	<p><b>GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION:</b> Maintain school-level GBV-sensitive complaint mechanism (with GBV/SEA referral system)</p>	Prior to commencement of the IPF component activities	MoE
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			

5.1	<p>1. No land acquisition, restrictions on land use, or involuntary resettlement may take place under the Project without the Association’s written prior approval.</p> <p>2. Diligence assessment shall be conducted for completed and ongoing high schools, and implementation of identified mitigation measures, if any, to address any legacy issues related to land acquisition as outline under 1.2 above.</p>	<p>1. Throughout Project implementation.</p> <p>2. Due diligence assessment to be completed and shared with the Association within six months of Project Effectiveness</p>	MoE
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p><b>BIODIVERSITY RISKS AND IMPACTS:</b> This standard is not relevant for the IPF component of the Program. Indirect risks, if any, should be mitigated following the requirements of ESS6.</p>	Throughout the Project implementation period	MoE
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	<p>The provisions under ESS7 are not considered relevant for all beneficiaries of the project A separate and stand-alone IPP is not required and necessary as ESS7 applies to host communities in Benishangul-Gumuz, Gambella, Afar and Somali regions. FPIC will not be applicable as host communities in these regions are covered under the term Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (IPSSAHUTLC). However, the Borrower will ensure that these communities including those in Tigray region are appropriately consulted and informed and can share from the project benefits in an inclusive and culturally appropriate manner (i.e. prevention and treatment) prior to project effectiveness</p>		
<b>ESS 8: CULTURAL HERITAGE.</b>			

8.1	<p><b>CHANCE FINDS:</b> As no civil work is anticipated under the IPF component of the Program and hence this standard not relevant for the IPF activities.</p>		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION:</b> Update of the draft Stakeholder Engagement Plan (SEP) and conduct site- specific stakeholder mapping and a forward-looking plan to ensure regular interaction of key stakeholders, including refugees and host communities as part of the site-specific plans. These plans shall be culturally acceptable and in appropriate languages for different stakeholders, including vulnerable groups and underserved peoples.</p> <p>Disclose the Stakeholder Engagement Plan prior to appraisal.</p> <p>Implement the Stakeholder Engagement Plan throughout project implementation</p>	<p>Update SEP within one month of Project Effectiveness.</p> <p>Update SEP regularly every six months until the Project closes and as stakeholders change</p> <p>Prior to appraisal</p> <p>Throughout Project implementation</p>	MoE
10.2	<p><b>PROJECT GRIEVANCE MECHANISM:</b></p> <p>1. Adopt, maintain, and operate one or several grievance mechanisms accessible to refugees and host communities. This include (1) Program level GRM and (2) Site specific GRM,</p> <p>2. MoE shall report on the status of these the GRMs, including any complaints received and their resolution, as part of the reporting under action A of this ESCP.</p>	<p>1. GRM to be operationalized prior to Project Effectiveness and maintained throughout Project implementation.</p> <p>2. Throughout Project implementation</p>	MoE
<b>CAPACITY SUPPORT (TRAINING)</b>			

CS1	<p>Environmental and social risk management focal persons/ specialists from Federal to Woreda level shall be trained on:</p> <ul style="list-style-type: none"> <li>• stakeholder mapping and engagement</li> <li>• the updated environmental and social guideline</li> <li>• OHS risk identification and management</li> <li>• community health and safety</li> <li>• GRM</li> <li>• Procedures for screening of Environmental &amp; Social Screening risks and impacts</li> <li>• GBV/SEA</li> </ul>	Prior to commencement of the IPF component activities	MoE
CS2	Ensure that all capacity building and technical assistance is aligned with the ESF and also with the P4R E&S Action Plan.	Throughout the Program implementation period	MoE