**[Republic of Cameroon / Ministry of Secondary Education (MINESEC) and the Ministry of Employment and Vocational Training (MINEFOP)]**

**[Secondary Education and Skills Development Project - 164117]**

**[Draft]**

**ENVIRONMENTAL and SOCIAL**

**COMMITMENT PLAN (ESCP)**

**[3/5/2020]**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. The Republic of Cameroon *will implement* the **Secondary Education and Skills Development Project** *name*] Project (the **Project**), with the involvement of the following Ministries/agencies/units: **Ministry of Secondary Education (MINESEC) and the Ministry of Employment and Vocational Training (MINEFOP)**. The *International Development Association (hereinafter [the Association)* *has agreed to provide* financing for the Project.
2. The Republic of Cameroon 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. The Republic of Cameroon 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), Resettlement Action Plans (RAP), Indigenous Peoples Plans (IPPs), and Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S documents.
4. The Republic of Cameroon is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the *Association* by the Republic of Cameroon 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 Republic of Cameroon, 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 Republic of Cameroon 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 Republic of Cameroon. The Republic of Cameroon 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 Republic of Cameroon 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, health, and safety impacts, labor influx, gender-based violence.

| **MATERIAL MEASURES AND ACTIONS** | | **TIMEFRAME** | **RESPONSIBILE ENTITY/AUTHORITY** |
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| **MONITORING AND REPORTING** | | | |
| A | **REGULAR REPORTING**  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 documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s). | *Quarterly (every three months), annual throughout Project implementation.* | *PCU* |
| B | **INCIDENTS AND ACCIDENTS**  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 included, for example: occupational, health and safety incidents and incidents or accidents that could result in death or serious injury; falls and vehicle accidents; cases of gender-based violence or violence against minors and students.  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, as per the Association’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.  The following will be given ultimate priority:  Notify within 48 hours any incident or accident related to the project or that has an impact on it, and that has or could have a significant adverse effect on the environment, the affected communities, the public, or the workers included, for example: occupational accidents that could result in death or serious injury; falls and vehicle accidents; cases of gender-based violence or violence against minors.  For GBV related-incidents, the survivor should be referred immediately to services (at the same time this is reported to the project team and World Bank: within 48 hours) following a survivor-centered protocol to be developed in the GBV-adapted GRM.  Provide enough details regarding the incident or accident, and indicate immediate measures taken to address it. Note that for GBV incidents, confidentiality should be ensured for the survivor and accused with no identifying information for either provided (i.e. include date of incident, GBV form, general description of survivor such as age/gender, general description of accused such as age/gender/where work, if incident is linked to the project in the survivor’s own words, what services the survivor was referred to/what s/he accepted, if the perpetrator signed a Codes of Conduct (CoC) and sanctions taken against him/her).  Provide sufficient details regarding the incident or accident, and indicate immediate measures taken to address it.  A report of the incident shall be submitted, detailing summary findings of the Root Cause Analysis (RCA).  An incident register shall be maintained at the PCU. | *Notify the Association within 48 hours after learning of the incident or accident, in line with the World Bank’s Environment and Social Incidence Response Toolkit (ESIRT).*  *An incident and accident report would be provided by the Republic of Cameroon within a time frame acceptable to the Association, as requested, in line with the World Bank’s Environment and Social Incidence Response Toolkit (ESIRT).* | *PCU, Contractor/sub-contractors;* |
| C | **CONTRACTORS MONTHLY REPORTS**  In case contractors and sub-contractors are hired for the Project activities or sub-activities, PCU will require such contactors/sub-contractors to submit monthly monitoring reports to the PCU regarding ESHS performance of the contracted work. The Republic of Cameroon upon request would submit such monthly monitoring reports to the Bank. | *Monthly reporting for contracted work(s) throughout contract/sub-contract period.* | *PCU*  *Contractor/sub-contractors* |
| **ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS** | | | |
| 1.1 | **ORGANIZATIONAL STRUCTURE**  A PCU shall be established under the MINEFOP/MINESEC and will appoint and maintain one (1) OHS specialist with competencies on environmental management and one (1) Social Specialist with a have GBV expertise.  The PCU’s Project Coordinator shall ensure OHS specialist and Social specialist shall be responsible for (not limited to):  implement and maintain a functional grievance-redress mechanism; constantly engage with project’s stakeholders; conduct the screening activities prior to the commencement of minor civil works; work in collaboration with the Divisional Delegation of MINEPDED on the monitoring of mitigation measures of the activities under implementation; ensure the inclusion of E&S aspects into the bidding documents; preparation of quarterly reports; and incorporate E&S aspects into the operational manual, etc. | *The staff shall be in place before effectiveness of project.* | *MINEFOP/MINESEC, PCU* |
| 1.2 | **ENVIRONMENTAL AND SOCIAL ASSESSMENT**   * MINEFOP/MINESEC will prepare and disclose the following instruments: ESMP, it will identify the GBV risks linked to proposed project activities. Given that the project might likely become effective during [or at the tail end] of the COVID19 crisis, the generic ESMP will be updated as relevant in early implementation to include some measures on addressing issues related to the pandemic, in line with national and international requirements.   A thorough Institutional capacity assessment (using World Bank guidance) will be carried out and an institutional Capacity Strengthening Plan elaborated. | *ESMP, to be finalized by appraisal*  *Site specific ESMPs, to be developed before any minor construction and /or rehabilitation works start.*  *The institutional capacity assessment will be carried out right after project’s effectiveness* | *Project’s preparation team*  *PCU* |
| 1.3 | **MANAGEMENT TOOLS AND INSTRUMENTS**     * Site specific ESMPs will be prepared for subprojects in a manner acceptable to the Association and implemented before rehabilitation, construction, operation, and decommissioning works start. * A specific Indigenous Peoples Plan will be prepared when the project’s footprint is known. * Based on the conclusions of site specific ESMPs, an Abbreviated Resettlement Actions Plans (ARAP) or Resettlement Actions Plans (RAPs) may be developed and implemented a manner acceptable to the Association. * Prior to the commissioning of vocational training equipment purchased, a Quality Control Plan/OHS will be developed and will include detailed requirements for the transport, handling and disposal of waste and other hazardous materials.   All of these plans need to include the Codes of Conduct that address Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) risks (inclusive of: ensure requirements in CoCs are clearly understood by those signing; Have CoCs signed by all those with a physical presence at the project site; Train project-related staff on the behavior obligations under the CoCs; Disseminate CoCs (including visual illustrations) and discuss with employees and surrounding communities.). | Site specific ESMPs will be prepared before minor civil works start.  A specific Indigenous Peoples Plan (IPP) will be prepared when subprojects are cleared, and their footprint known. It will be submitted for the Bank/Association approval and once approved, it will be carried out throughout Project implementation.  Site specific ESMPs and ARAP (if needed) will be prepared and submitted for the Bank/Association approval before starting rehabilitation, construction, operation, and decommissioning for the respective subproject cleared. Once approved, site specific ESMPs and ARAP are carried out throughout Project implementation. | *PCU* |
| 1.4 | **MANAGEMENT OF CONTRACTORS**  MINEFOP / MINESEC and PCU will ensure that the Contractor ToR’s and bidding documents include environmental and social requirements (including CoCs, GBV and child labor prevention measures; non-discrimination measures; reporting guidelines; monitoring and GRM).  Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, and the LMPs, into the ESHS specifications of the procurement documents with contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts.  MINEFOP / MINESEC shall also ensure that Contractors and subcontractors prepare and implement the following:   * develop and implement site specific ESMPs, in accordance with the generic ESMP. Site specific ESMPs will address waste management, occupational health and Safety risks, etc.   The procurement documents should set out clearly how adequate GBV costs will be paid for in the contract. This could be, for example, by including: (i) line items in bill of quantities for clearly defined GBV activities (such as preparation of relevant plans) or (ii) specified provisional sums for activities that cannot be defined in advance (such as for implementation of relevant plan/s, engaging GBV service providers, if necessary). | *Prior to the preparation of procurement documents.*  *Supervise contractors throughout Project implementation* | *PCU* |
| **ESS 2: LABOR AND WORKING CONDITIONS** | | | |
| 2.1 | **LABOR MANAGEMENT PROCEDURES**  The Client will elaborate a Labor Management Procedure (LMP). LMP’s principles will also be applied to contractors, sub-contractors and primary suppliers. The LMP will include the following key elements:     * Available information to workers regarding their terms of employment. The information will set out their rights under national labor and employment law, including their rights related to hours of work, wages, overtime, compensation and benefits; * Provide workers with adequate periods of rest per week, annual holiday and sick leave, as required by national law; * Ensure Non-Discrimination and Equal Opportunity especially concerning gender in the recruitment process and PROJECT implementation; * Set out measures to prevent and address harassment, intimidation and/or exploitation in human resources policies and procedures; * Works should have signed contracts with clear terms as per the Cameroon Labor law; * Measures against GBV, forced labor and child labor; * Dedicated GRM for staff and other workers. | *Before recruitment of PCU’s labor force* | *PCU* |
| 2.2 | **GRIEVANCE MECHANISM FOR PROJECT WORKERS**  Establish, maintain, and operate a grievance redress mechanism for project’s staff accessible and in line with Cameroon regulations. | *Grievance mechanism should be operational prior engaging Project workers and maintained throughout Project implementation* | *PCU* |
| 2.3 | **OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES**  The ESMP includes OHS generic measures. Contractors shall prepare and implement a site specific ESMPs that include OHS risks management.  MINEFOP / MINESEC- will also prepare a Quality Control Plan/OHS prior to the commissioning of vocational training equipment purchased under the project.  The OHS paragraphs shall include:   * identification of potential hazards to project workers and students working on vocational training equipment, particularly those that may be life-threatening; * provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances; * training of project workers, students, teachers and maintenance of training records; Documentation and reporting of occupational accidents, diseases and incidents; * emergency prevention, preparedness and response arrangements.   These measures should be inclusive of measures to mitigate risks of GBV such as having separate, safe and easily accessible facilities for women and men working on the site. Locker rooms and/or latrines should be in separate areas, well-lit and include the ability to be locked from the inside. Visibly displaying signs around the project site (if applicable) that signal to workers and the community that the project site is an area where GBV is prohibited. As appropriate, public spaces around the project grounds should be well-lit. | *Preparation of site specific ESMPs prior to commencement of civil works*  Preparation of a Quality Control Plan/OHS prior to the commissioning of vocational training equipment purchased | *Contractors, MINEFOP/MINESEC/PCU* |
| **ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT** | | | |
| 3.1 | **RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:**  *Site specific ESMPs to be developed prior to any construction works will include measures related to resource efficiency and pollution prevention and management.* | *Site specific ESMPs to be prepared prior to commencement of works.* | *MINESEC/MINEFOP/PCU/CONTRACTOR* |

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| **ESS 4: COMMUNITY HEALTH AND SAFETY** | | | |
| 4.1 | **TRAFFIC AND ROAD SAFETY**:  Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in site specific ESMPs to be developed in accordance with the generic ESMP, in a manner acceptable to the Bank.  Appropriate measures and plans including gender - based violence (**GBV) and sexual exploitation and sexual exploitation and abuse (SEA)** will be identified, developed and implemented to address potential traffic and roads safety risks, including appropriate training to workers on driver and vehicle safety. | *Prior to commencement of minor rehabilitation works and maintain during the project timeline.* |  |
| 4.2 | **COMMUNITY HEALTH AND SAFETY:** site specific ESMPs for rehabilitation works will include installation and/or upgrade of fire and life safety measures (physical infrastructures and training, drills, etc.), and universal access for disable people, in a manner acceptable to the Bank. | *Prior to commencement of minor rehabilitation works and throughout Project implementation.* |  |
| 4.3 | **GBV AND SEA RISKS**: [For projects with a moderate, substantial, or high prevalence of GBV risk]  Prepare, 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). | *By project’s appraisal* | *Project’s preparation team* |
| 4.4 | **SECURITY PERSONNEL**: In case of use security forces to safeguard field’s operations, the Borrower will assess risks related to those security arrangements and will be guided by the principles of proportionality and Good International Industry Practice (GIIP), and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of security forces. | *Prior to engaging security personnel and thereafter implemented throughout Project implementation* |  |

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| **ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT** | | | |
| 5.1 | **RESETTLEMENT PLANS:** Prepare, adopt, and implement resettlement plans (RAPs) in accordance with ESS 5 and consistent with the requirements of the Resettlement Policy Framework (RPF) that has been prepared for the Project, and thereafter adopt and implement the respective RAPs before carrying out the associated activities, in a manner acceptable to the Bank.  More specifically:   * Prepare a Resettlement Policy Framework (RPF) * Prepare Abbreviated Resettlement Actions Plans (ARAP) or Resettlement Actions Plans (RAPs) | *RPF to be prepared and disclosed before appraisal*  *RAPs and ARAPs to be prepared when necessary before construction work starts* | *PCU* |
| **ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES** | | | |
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| **ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES** | | | |
| 7.1 | **INDIGENOUS PEOPLES PLAN**:  Prepare an Indigenous Peoples Planning Framework (IPPF) to set principles of IPs consultation and activities implementation throughout the project.  Prepare an Indigenous Peoples Plan to set specific activities and implementation plan to address IPs needs in the framework of the project | *IPPF to be prepared and disclosed by appraisal*  *IPP to be prepared after project’s effectiveness* | *PCU* |
| **ESS 8: CULTURAL HERITAGE** | | | |
| 8.1 | All site specific ESMPs will inlcude a chance find procedure and all contracts will include a “Chance Find” clause which will require contractors to stop rehabilitation in the event that cultural property sites are encountered during construction. | *Prior to any rehabilitation and/or construction works* |  |

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| **ESS 9: FINANCIAL INTERMEDIARIES** [This standard is only relevant for Projects involving Financial Intermediaries (FIs). See below a couple of examples of actions that should be considered when FIs are involved.] | | | |
| 9.1 | **ESMS**: Not relevant |  |  |
| 9.2 | FI ORGANIZATIONAL CAPACITY: Not relevant |  |  |
| 9.3 | SENIOR MANAGEMENT REPRESENTATIVE: Not relevant |  |  |
| **ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE** | | | |
| 10.1 | STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION   * Prepare and disclose a Stakeholders’ Engagement Plan (SEP) | *SEP to be prepared and disclosed by appraisal*  *GRM’s guidelines to be prepared as part of the SEP* | Project’s preparation team |
| 10.2 | PROJECT GRIEVANCE MECHANISM:   * Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP. | *GRM to finalized after project’s effectiveness as per ESMP and SEP’s guidelines* | *PCU* |
| **CAPACITY SUPPORT (TRAINING)** | | | |
| CS1 | * Capacity-building of stakeholders (teachers, administrative staff, pedagogic inspectors, etc.) on Environmental and Social Framework (ESF), training for the project unit, on proper use of equipment and facilities, hygiene, maintenance, environmental issues, risks, gender, vulnerable group, Grievance Mechanism; Stakeholder engagement; Specific aspects of environmental and social assessment; Community health and safety, Environment and social monitoring and reporting; Emergency preparedness and response, etc. | *Before project effectiveness and throughout the project* | *The World Bank /PCU* |
| CS2 | * ESF briefing session during the launching workshop. A workshop will be organized as soon as possible after credit approval and when the PCU is in place to inform all relevant parties, especially those who will have a role during project implementation about the project objectives and implementation arrangements and processes. | After credit approval and when the PCU | *MINESEC/MINEFOP/PCU* |