



GOVERNMENT OF LIBERIA

**Ministry of Commerce and Industry
Ministerial Complex
Congo Town, Monrovia**



Liberia Investment, Finance, and Trade (LIFT) Project

Loan No./Credit No./ Grant No.: (P171997)

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

December 07

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Liberia (**the Recipient**) will implement the Liberia Investment, Finance, and Trade Project (**the Project**), through the Ministry of Commerce and Industry (MOCI) and their respective Departments and Agencies. The International Development Association (IDA) (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 environmental and social (E&S) documents required under the Environmental and Social Framework (ESF) and referred to in this ESCP, such as Environmental and Social Management Framework (ESMF), Environmental and Social Management Plans (ESMPs), Resettlement Policy Framework (RPF), Labor Management Procedure (LMP) and Stakeholder Engagement Plan (SEP), and the timelines specified in those E&S documents.
4. The Government of Liberia 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 or another entity.
5. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Association by the Government of Liberia as required by the ESCP and the conditions of the legal agreement, and the Association shall 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 Government of Liberia, 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, MOCI on behalf of the Recipient will agree to the changes with the Association and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Association and the MOCI. The Government of Liberia through the Ministry of Commerce and Industry 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, through MOCI, shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include but are not limited to environmental, health, and safety impacts, social, labour influx, gender-based violence risks.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
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 documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism.</p>	<p>Quarterly throughout Project implementation period <i>starting from the effective date.</i></p>	<p>Ministry of Commerce and Industry (MOCI), Project Implementation Unit (PIU).</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 project workers including those related to occupational accidents that could result in death or serious injury, falls and vehicle accidents, gender-based violence (GBV). Particularly sexual exploitation, abuse and sexual harassment (SEA/H). 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 request, prepare a report on the incident or accident including a root cause analysis, propose any measures to prevent its recurrence, and keep the Association informed of the ongoing implementation of the said measures or plans.</p> <p>The report shall provide sufficient details 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>Notify the Association within 48 hours after learning of the incident or accident.</p> <p>An incident report shall be provided to the Association on timeframe specified by the Association.</p>	<p>Ministry of Commerce and Industry (MOCI), PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
C	<p>Contractors Monthly Report</p> <p>All project-supported entities including businesses, firms, consultants/engineers and contractors shall be required to provide monthly monitoring reports on ESMPs implementation, Labor and Occupational Health and Safety, and GRM implementation to MOCI PIU and shall take actions on issues of non-compliance or poor implementation.</p> <p>The MOCI shall maintain a record of all such reports and would be submitted to the Association upon request. Implementation and monitoring reports on ESHS to the Association shall provide an overview of issues relating to project credit line beneficiaries, supervising consultants and contractor performance and follow up actions.</p>	<p>Monthly reports shall be submitted by grantees supervising consultants, and contractors to MOCI-PMU and to the Association upon request throughout project implementation</p> <p>Quarterly reports to be submitted to the Association throughout project implementation</p>	Ministry of Commerce and Industry (MOCI), PIU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>The Ministry of Commerce and Industry (MOCI) through its Project Implementation Unit (PIU) will be responsible for overall project implementation.</p> <p>MOCI shall establish and maintain an organizational structure with qualified staff and resources to support management of E&S risks and impacts of the Project, including one Environmental and one Social Specialist (E&S Specialists) to ensure adequate risk identification, management and reporting consistent with the reporting requirements in this ESCP.</p> <p>The E&S Specialists shall be adequately resourced to support the management of E&S risks. The Project shall also hire external expertise and consultancy services, where necessary to ensure that E&S risks are adequately assessed and managed. This structure shall be maintained throughout project implementation.</p> <p>The PIU shall establish an Environmental and Social Management information and Reporting System.</p>	<p>The one Environmental Specialist and one Social Specialist shall be assigned to the project before the Project Effectiveness Date.</p> <p>MOCI PIU with requisite E&S staffing and resources shall be maintained throughout Project implementation.</p>	Ministry of Commerce and Industry (MOCI) PIU

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<p>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>No major infrastructural works are anticipated from this project and the E&S risks are rated moderate. Using the E&S Screening Tools in the ESMF, the project shall screen to identify the potential E&S risks of subproject activities and determine relevant risks assessment and mitigation plans, i.e., Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs), and others as may be required to mitigate the identified E&S risks and impacts during implementation.</p> <p>The E&S documents together with the Labor Management Procedures (LMP) shall address other E&S risks relevant to the Project in a proportionate manner, including such risks as local labour issues, community health and safety, sexual harassment and sexual exploitation and abuse, ensuring citizen engagement, and social inclusion for the poorest and most vulnerable to prevent elite capture of Project interventions among others.</p> <p>The PIU shall require selected Financial Institutions (FIs) to recruit and maintain qualified environmental and social safeguard officers whose duty will entail ensuring sustainability of selected projects. These officers will design and apply screening forms to select the most credible beneficiaries with respect to both the FI's E&S requirements and also the project. The PIU will collaborate with the FIs to ensure consistency in the E&S requirements and standards.</p>	<p>Screening to be done upon identification and selection of sub-projects location(s).</p> <p>Requirement of E&S officers among FIs to be made during the selection stage.</p>	<p>MOCI PIU</p> <p>MOCI PIU</p>

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1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>Screen any proposed subproject in accordance with the Environmental and Social Management Framework (ESMF) prepared for the Project, and, thereafter, draft, adopt, disclose, and implement any required subsequent subproject environmental management tools or instruments, including subproject specific ESIA/ESMPs, in accordance with the ESSs and the ESMF in a manner acceptable to the Association.</p>	<p>Any required site specific ESIA/ESMPs and other relevant E&S instruments shall be prepared and submitted for the Association’s review and approval. Once approved, the specific instruments and other relevant management plans shall be disclosed and carried out throughout Project implementation.</p>	MOCI PIU
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP and ESMF, including relevant E&S documents and plans, the Labor Management Procedures, and worker code of conducts into the Environment, Social, Health and Safety (ESHS) specifications of the procurement documents for contractors.</p> <p>Ensure that contractors develop Contractors’ ESMP and Labor Management Plans, and other management plans as may be deemed necessary during implementation consistent with the Project’s ESMF requirements, comply and report on them as required by this ESCP.</p> <p>Thereafter, MOCI/PIU shall ensure that the contractors comply with the ESHS specifications of their respective contracts.</p> <p>Require project grantees to ensure ESHS compliance among their contractors</p>	<p>Prior to launch of bidding process</p> <p>Include all ESSs/ESCP requirements into the construction contractor and the supervising consultant contracts. Supervise contractors throughout Project implementation. Request contractors to submit monthly progress reports.</p> <p>Include ESHS requirements in contracts with project grantees</p>	MOCI PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.5	<p>PERMITS, CONSENT AND AUTHORIZATION</p> <p>Secure relevant permits, consents, and authorizations applicable to the subproject activities from relevant national authorities and agencies.</p> <p>Comply or cause to comply, as appropriate, with the conditions established in these permits, consents, and authorizations throughout Project implementation.</p>	<p>Obtain permits, consents, and authorizations before commencing relevant Project activities. Thereafter, implement and comply with permits, consents, and authorizations throughout Project implementation.</p>	MOCI PIU
1.6	<p>CONTINGENT (EMERGENCY) RESPONSE FINANCING</p> <p>Develop CERC-ESMF that includes a description of the ESHS assessment and management arrangements and procedures for the activation and implementation of the CERC under the project in accordance with the ESSs.</p> <p>Thereafter prepare, disclose, consult, adopt, and implement any environmental and social (E&S) management plans or other instruments required for the respective CERC activities in accordance with the ESSs, CERC-ESMF, the World Bank Group Environmental, Health and Safety Guidelines (EHSGs), and other relevant Good International Industry Practice (GIIP) including World Health Organization (WHO) guidance documents on COVID-19 in a manner acceptable to the Association. Thereafter implement the measures and actions required under the said E&S management plans or instruments, within the timeframes specified in the plans.</p>	<p>The CERC ESMF will be developed within 4 weeks after the CERC is triggered during an emergency.</p> <p>Implement the measures and actions required under the CERC E&S management plans or instruments, within the timeframes specified in the plans.</p>	MOCI PIU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Association through, inter alia, implementing adequate occupational health and safety measures (e.g. include provisions in the Labor Management Procedures (LMP) for direct, contracted, and supply workers.</p>	<p>Throughout Project implementation.</p>	MOCI PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Require contractors and grantees to establish, maintain, and operate a grievance mechanism for workers, as described in the LMP and consistent with ESS2.</p>	Develop a Grievance Mechanism prior to engaging Project workers and maintain GR structure throughout Project implementation.	MOCI PIU
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Ensure contractors and project-supported entities prepare and implement OHS plan including COVID-19 prevention and response measures.</p> <p>Require Contractor(s) working on the Project to abide and implement approved OHS measures as detailed in the ESMF and specific instruments such as the ESMP.</p> <p>PROJECT WORKERS TRAINING</p> <p>Require project-supported entities and contractors to deliver training on Environmental, Social, Health and Safety (ESHS) aspects relevant to the Project to their workers</p>	<p>OHS measures shall be prepared and adopted prior to commencement of subproject activities and shall be implemented throughout Project implementation.</p> <p>Quarterly throughout implementation</p>	MOCI PIU

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2.4	<p>EMERGENCY PREPAREDNESS AND RESPONSE (OHS) MEASURES</p> <p>As part of the OHS measures specified above in 2.3 and consistent with ESS2, adopt and implement measures on Emergency Preparedness and Response, including to ensure that workers and contractors are trained on emergency preparedness and response on a regular basis, drills are conducted regularly, and the relevant emergency plans are implemented.</p>	<p>Plans to be adopted prior to initiation of subprojects involving construction, and maintained throughout Project implementation</p> <p>Training to be conducted within two weeks of the plans' adoption and training (including drills) repeated regularly throughout Project implementation.</p>	MOCI PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</p> <p>Assess impacts from waste generation, pollution and effluent discharge expected from businesses to be supported and other subproject activities and include relevant mitigation measures in subproject-specific ESMPs. Ensure adherence to the mitigation measures.</p>	<p>During preparation and implementation of site specific ESMPs</p>	MOCI PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from Project activities and include these measures in ESMPs required by the ESMF, in a manner acceptable to the Association.</p> <p>The project shall conduct awareness raising for local authorities, and regular monitoring, to ensure that no unpaid, forced, or child labour is used on any activity related to Project implementation</p>	<p>Develop measures as part of the ESMP prior to commencement of subproject activities</p> <p>Implement measures - throughout Project implementation</p>	MOCI PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.3	<p>GBV AND SEA RISKS</p> <p>Include in site-specific ESMPs actions to prevent and mitigate risks of sexual exploitation and abuse and sexual harassment (SEA/SH) in line with the ESMF and enforce their implementation. This includes but not limited to the development and adherence to Code of Conduct for all employees, GBV-sensitive grievance mechanism, awareness raising of all employees and community members on GBV risks and mitigation measures. The PIU shall develop a list of GBV service providers and prepare a map of service providers, collaborate with local NGOs in the area and with the government department.</p>	Enforcement throughout Project implementation	MOCI PIU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
	<p>Prepare, adopt, and implement Resettlement Action Plans (RAPs) in accordance with ESS 5. Ensure that RAPs are approved by the Association and fully implemented before carrying out the associated activities, in a manner acceptable to the Association. Including:</p> <ul style="list-style-type: none"> • Conducting sub-project site-specific E&S screening using the screening tool provided in the ESMF, • Consulting and informing PAPs about their rights and choices, • Thereafter preparing RAPs in accordance with ESS 5 and consistent with the requirements, • Obtaining the RAP clearance from the Bank. • Ensuring that construction contracts are signed after or contractors are mobilization after PAPs are paid, • Ensure that commencing of civil work in the impact location(s) or corridor(s) will not start till compensations and resettlement assistances are paid to all PAPs, • Submitting to and obtaining clearance from the Bank on compensation and resettlement assistance payments completion report. • Ensuring that Site handover to the contractor is done after expiration of eviction notice –minimum three months after paying compensation. • Monitoring resettlements impacts. 	RAPs shall be submitted for the Association’s approval and once approved, implemented prior to commencing respective Project activities that involve land acquisition and resettlement	MOCI PIU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<p>Screen all subproject activities and sites to avoid impacts on natural habitats and biodiversity. In the event of a chance find of a critical habitat or biodiversity, the MOCI PIU shall immediately secure the area, prevent it from being disturbed and notify appropriate institutions mandated to handle such finds. The MOCI PIU shall cause all contractors and project-supported entities to comply with this provision.</p> <p>Where necessary, MOCI PIU shall prepare a Biodiversity Management Plan (BMP).</p>	<p>Screening to be done following site identification and before commencement of project activities.</p> <p>Biodiversity Management Plan to be prepared as necessary before commencement of project activities on the ground</p>	MOCI PIU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
This ESS is not currently relevant to the project.			
ESS 8: CULTURAL HERITAGE			
This ESS is currently not relevant to the project			
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	RECRUITMENT OF E&S RISK OFFICERS		
	Require FIs to recruit and maintain qualified E&S officers capable of designing and using screening forms to select credible credit line beneficiaries in a fair and transparent manner	During contracting of FIs.	MOCI PIU, FIs
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION		
	Implement, collect feedback, update, and adopt the Stakeholder Engagement Plan (SEP) prepared for the Project including completing: i) information dissemination, ii) information feedback and, iii) consultation and participation as stated in Table 4.1.2 of the SEP. Revise the SEP as necessary.	Throughout Project implementation	MOCI PIU
10.2	PROJECT GRIEVANCE MECHANISM		
	Establish, constitute, maintain, and operate a grievance mechanism, as described in the ESMF.	Before Project commencement and maintain throughout the Project life cycle.	MOCI PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
CAPACITY SUPPORT (TRAINING)			
C1	<p>CAPACITY SUPPORT AND TRAININGS TO BE PROVIDED</p> <p>Prepare a capacity building/training plan identifying the training needs of all relevant actors including implementing ministries/agencies, guarantee, Financial Institutions (FIs) and project credit line beneficiaries, contractors etc. and develop appropriate training materials.</p> <p>Ensure that project beneficiaries are trained in the following areas:</p> <ul style="list-style-type: none"> • The Project’s GRM • Stakeholder roles and engagement • E&S requirements (impacts and mitigation measures) for sub-projects • COVID 19 transmission, prevention, preparedness, and response • Credit line beneficiaries screening • Subproject Environmental and Social screening • Occupational Health and Safety • Emergency preparedness and response • SEA/SH Risk reporting and Mitigation • Disability inclusion training • Documentation and reporting 	<p>Prepare capacity building/training plan within 6 months of the Project effectiveness date</p> <p>Develop training materials prior to commencement of training</p> <p>Training to be delivered throughout the life of the project</p>	MOCI PIU