

**Independent State of Papua New Guinea**

**Learning Enhancement and Access Project  
(LEAP) (P505529)**

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

**Appraisal Version (Draft)**

**January 2025**

## **ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. The Independent State of Papua New Guinea (the Recipient) will implement the Learning Enhancement and Access Project (the Project), with the involvement of the National Department of Education (NDoE), as the implementing agency, as set out in the Financing Agreement (the Agreement). The International Development Association (the Association) has agreed to provide financing for the Project (P505529), as set out in 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 Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
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, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreement, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Representative specified in the Agreement or the Minister of Education. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

| MATERIAL MEASURES AND ACTIONS                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | TIMEFRAME                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | RESPONSIBLE ENTITY |
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| IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                    |
| A                                                | <p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>a. The Recipient shall establish and maintain a Project Management Unit (PMU) with qualified staff and resources to support management of environmental, social, health and safety (E&amp;S) risks and impacts of the Project including an E&amp;S Specialist and Gender and Gender Based Violence (GBV) Specialist.</p> <p>b. The Recipient shall cause Provincial Departments of Education (PDoEs) to establish and maintain Provincial Project Offices (PPOs) to support management of E&amp;S at the provincial level including Community Engagement and E&amp;S Officer(s).</p> | <p>a. Establish a PMU and hire an E&amp;S Specialist and a Gender and GBV Specialist no later than three (3) months after project effectiveness and thereafter maintain the PMU and these positions throughout Project implementation.</p> <p>b. Establish the PPO(s) and hire the Community Engagement and E&amp;S Officer(s) no later than 6 (six) months after project effectiveness and thereafter maintain the PPOs and these positions throughout Project implementation.</p> | <b>NDoE</b>        |

| MATERIAL MEASURES AND ACTIONS |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | TIMEFRAME                                                                                                                                                                                                                                       | RESPONSIBLE ENTITY |
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| B                             | <p><b>CAPACITY BUILDING PLAN/MEASURES</b></p> <p>The Recipient shall prepare and implement a capacity building plan that will include the implementation of the following capacity building measures for national PMU staff, provincial PPO staff, Project workers, stakeholders, Project participants, contractor(s) and communities, on:</p> <ul style="list-style-type: none"> <li>• Implementation of the Project's E&amp;S instruments and respective mitigation measures.</li> <li>• The Project's grievance mechanism (GM), including the processes for handling sensitive complaints such as school based GBV, Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), and Violence Against Children (VAC) incidents.</li> <li>• The Project Stakeholder Engagement Plan (SEP) and good practices related to engaging stakeholders, including vulnerable and marginalized groups, in an ethical and responsive way.</li> <li>• Sub-component activity environmental and social screening processes.</li> <li>• Site specific environmental and social management plans (Environmental and Social Management Plans (ESMP), Environmental and Social Codes of Practice (ESCOP), Land Due Diligence Reports (LDDR)).</li> <li>• Preparation and monitoring of Contractors ESMPs (C-ESMPs).</li> <li>• Labor Management Procedures (LMP), including the Code of Conduct and Project workers GM.</li> <li>• Land Access Procedures (LAP).</li> <li>• Occupational health and safety (OHS).</li> <li>• Community health and safety including unexploded ordnance (UXO) chance finds.</li> <li>• Cultural heritage chance finds procedures.</li> <li>• School related GBV, SEA/SH, and VAC risk management.</li> <li>• Others (to be determined according to needs).</li> </ul> | Six (6) months after the project effectiveness and thereafter update the Capacity Building Plan on a quarterly basis during Project implementation.                                                                                             | PMU within NDoE    |
| MONITORING AND REPORTING      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                 |                    |
| C                             | <p><b>REGULAR REPORTING</b></p> <p>The Recipient shall prepare and submit to the Association regular monitoring reports on the E&amp;S performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> <li>• Status of preparation and implementation of site-specific E&amp;S documents required under the ESCP.</li> <li>• Summary of stakeholder engagement activities carried out as per SEP.</li> <li>• Complaints submitted to the GM(s), the grievance log, and progress made in resolving them.</li> <li>• E&amp;S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports (as relevant).</li> <li>• Number and status of resolution of incidents and accidents reported under action E below.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Submit six (6) monthly reports to the Association throughout Project implementation, commencing six (6) months after project effectiveness. Submit each report to the Association no later than 30 days after the end of each reporting period. | PMU within NDoE    |

| MATERIAL MEASURES AND ACTIONS                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | TIMEFRAME                                                                                                                                                                                                                                                                                                                                                          | RESPONSIBLE ENTITY |
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| D                                                                                     | <p><b>CONTRACTORS' MONTHLY REPORTS</b></p> <p>The Recipient shall require contractors and supervising firms to provide monthly monitoring reports on E&amp;S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Submit the monthly reports to the Bank as annexes to the reports to be submitted under action C above.                                                                                                                                                                                                                                                             | PMU within NDoE    |
| E                                                                                     | <p><b>INCIDENTS AND ACCIDENTS</b></p> <p>The Recipient shall notify the Association of any incident or accident relating 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 those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of GBV, SEA/SH or VAC; or disease outbreaks. Provide available details of the incident or accident to the Association upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>                                                                                                                                                                                                                                | <p>Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.</p> | PMU within NDoE    |
| <b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                    |                    |
| 1.1                                                                                   | <p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b></p> <p>a. The Recipient shall review and update the Environmental and Social Management Framework (ESMF) for the Project including, <i>inter alia</i>, the Environmental and Social Risk Screening Form for Civil Works, the Environmental and Social Codes of Practice (ESCOP), and Environmental and Social Management Plan (ESMP) Template.</p> <p>b. The Recipient shall screen civil works activities using the screening process outlined in the ESMF as activities are confirmed and prepare and/or implement relevant activity level E&amp;S instruments (site-specific ESMPs, relevant ESCOPs) as set out in the ESMF, to be prepared under action 1.1(a) above. The proposed activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</p> <p>c. The Recipient shall include E&amp;S obligations and processes in the Early Childhood Education (ECE) grants manual (subcomponent 1.2). Early childhood education grant activities shall be implemented throughout project implementation in accordance with the grant manuals. The proposed activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</p> | a. Review and update the ESMF (dated January 2025), which has been prepared and disclosed, within six (6) months of project effectiveness, and thereafter implement the ESMF throughout Project implementation.                                                                                                                                                    | PMU within NDoE    |

| MATERIAL MEASURES AND ACTIONS                                                                                                                                                                                                                                                                                                                                                                                                   | TIMEFRAME                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | RESPONSIBLE ENTITY |
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| <p>d. The Recipient shall cause the PDoEs to include E&amp;S obligations and processes in the school's infrastructure grants manual (subcomponent 3.3). Infrastructure grant activities shall be implemented throughout Project implementation in accordance with the grant manual. The proposed activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</p> | <p>b. Screen civil works activities and prepare and/or implement activity level E&amp;S instruments (site-specific ESMPs, ESCOPs), as applicable. Draft activity level E&amp;S instruments shall be finalized before launching the bidding process. Activity level E&amp;S instruments shall be incorporated as part of the respective bidding documents for the respective activities before the commencement of any physical works. Once finalized, implement the respective activity level E&amp;S instruments throughout Project implementation.</p> <p>c. Include E&amp;S processes in the Component 1 grant manual to be developed with six (6) months of project effectiveness and thereafter implement the E&amp;S processes throughout Project implementation.</p> <p>d. Include E&amp;S processes in the infrastructure grant manual to be developed with six (6) months of project effectiveness and thereafter implement the E&amp;S processes throughout Project implementation.</p> |                    |

| MATERIAL MEASURES AND ACTIONS              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | TIMEFRAME                                                                                                                                                                                                             | RESPONSIBLE ENTITY |
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| 1.2                                        | <b>MANAGEMENT OF CONTRACTORS</b><br>The Recipient shall incorporate the relevant aspects of the ESCP, including, <i>inter alia</i> site specific ESMP(s), ESCOPs, LMP, and code of conduct, into the E&S specifications of the bidding or procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association. | As part of the preparation of the bidding or procurement documents and respective contracts. Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Bank upon request. | PMU within NDoE    |
| 1.3                                        | <b>TECHNICAL ASSISTANCE</b><br>The Recipient shall carry out the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project, including, <i>inter alia</i> , the Audit of Existing ECE centers and Infrastructure Needs Assessment, in accordance with terms of reference (TORs) acceptable to the Association, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the TORs.                                                                                                                      | Review TORs for E&S risks prior to the launching of the bidding process for such activities.                                                                                                                          | PMU within NDoE    |
| 1.4                                        | <b>USE OF RECIPIENT'S ENVIRONMENTAL AND SOCIAL FRAMEWORK</b><br>A rapid analysis of the Recipients E&S Framework (RESF) against the World Bank's ESF relevant to project activities and risks is included as part of the ESMF prepared under 1.1(a) above. This analysis identifies that the RESF can be utilized where it is acceptable. Gap filling measures have been identified for where the RESF differs from the World Bank ESF.                                                                                                                                                                                      | Throughout Project implementation.                                                                                                                                                                                    | PMU within NDoE    |
| <b>ESS 2: LABOR AND WORKING CONDITIONS</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                       |                    |
| 2.1                                        | <b>LABOR MANAGEMENT PROCEDURES</b><br>The Recipient shall prepare and implement LMPs for managing the Project workforce, including a worker's GM, Code of Conduct, minimum work age of 18 for direct and contracted workers, and strict conditions for engaging community workers between 14-18 years as part of the ESMF prepared under action 1.1(a).                                                                                                                                                                                                                                                                      | Prepare the LMPs as part of the ESMF prepared under action 1.1(a), prior to engaging project workers, and thereafter implement them throughout Project implementation.                                                | PMU within NDoE    |
| 2.2                                        | <b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b><br>The Recipient shall establish and operate a GM for project workers, as described in the LMP as part of the ESMF prepared under action 1.1(a), and consistent with ESS 2.                                                                                                                                                                                                                                                                                                                                                                                                   | Establish the GM prior to engaging project workers and before project activities commence and thereafter maintain and operate it throughout Project implementation.                                                   | PMU within NDoE    |

| MATERIAL MEASURES AND ACTIONS                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | TIMEFRAME                                                                                                                                                                                                   | RESPONSIBLE ENTITY |
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| <b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                             |                    |
| 3.1                                                                                   | <b>WASTE MANAGEMENT PLAN</b><br>The Recipient shall include waste management procedures as part of the ESCOPs and site specific ESMPs prepared for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS 3.                                                                                                                                                                                                                                             | Include waste management procedures as part of the ESCOPs and site-specific ESMPs to be prepared under 1.1b above.                                                                                          | PMU within NDoE    |
| 3.2                                                                                   | <b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b><br>The Recipient shall incorporate resource efficiency and pollution prevention and management measures in the site specific ESMPs, consistent with ESS 3.                                                                                                                                                                                                                                                    | Same timeframe as for the preparation and implementation of the site-specific ESMPs to be prepared under 1.1b above.                                                                                        | PMU within NDoE    |
| 3.3                                                                                   | <b>MANAGEMENT OF E-WASTE</b><br>The Recipient shall plan for end-of-life e-waste management at the time of procurement and this requirement is included in the ESMF prepared under action 1.1(a), consistent with ESS 3. E-waste management and safe disposal requirements will be included in relevant grant manuals and/or contracts.                                                                                                                                          | a. Same timeframe as for 1.1(a) and implemented before the installation of such equipment.                                                                                                                  | PMU within NDoE    |
| <b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                             |                    |
| 4.1                                                                                   | <b>COMMUNITY HEALTH AND SAFETY</b><br>The Recipient shall assess and manage specific community health and safety risks and impacts to the community arising from Project activities, including, <i>inter alia</i> , school related GBV risks (refer to 4.2) and general safety risks associated with construction sites at school sites and within communities, and require grantees and contractors to implement community health and safety measures in accordance with ESS 4. | Same timeframe as for the preparation and implementation of the ESCOPs and site-specific ESMPs to be prepared under 1.1b above.                                                                             | PMU within NDoE    |
| 4.2                                                                                   | <b>SCHOOL RELATED GBV / SEA AND SH RISKS</b><br>The Recipient shall implement the GBV Prevention and Response Action Plan (GBV Action Plan), that outlines prevention and response measures to be implemented by the Project.                                                                                                                                                                                                                                                    | Implement the GBV Action Plan (dated January 2025) throughout Project implementation.                                                                                                                       | PMU within NDoE    |
| <b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                             |                    |
| 5.1                                                                                   | <b>RESETTLEMENT PLANS</b><br>a. The Recipient shall implement Land Access Procedures (LAP) for the Project, consistent with ESS5, and included in the ESMF prepared under action 1.1(a) above.<br><br>b. Grant manuals prepared under 1.1(c) above shall include the LAP requirement and processes.<br><br>c. Grant manuals prepared under 1.1(d) above shall include the LAP requirements and processes.                                                                        | a. Same timeframe as for 1.1(a).<br><br>b. Same timeframe as for 1.1(c)<br><br>c. Same timeframe as for 1.1(d)<br><br>d. Screening of activities and preparation of LDDR, as required, prior to approval of | PMU within NDoE    |

| MATERIAL MEASURES AND ACTIONS                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                            | TIMEFRAME                                                                                                                                                                                                                                                                                                                                                                                                               | RESPONSIBLE ENTITY |
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|                                                                                                             | d. Once Project site locations are known, the Recipient shall screen civil works activities to assess the likely impacts related to land and land access, consistent with ESS5 and the guidance provided in the LAP prepared under action 5.1(a) above. The Recipient shall follow the relevant procedures and prepare and implement a LDDR for each activity in accordance with the ESMF, relevant grant manual(s), and the LAP.                          | grants and thereafter implemented throughout Project implementation. All land lease agreements / access arrangements must be in place / verified prior commencement of any construction works.                                                                                                                                                                                                                          |                    |
| <b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>              |                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                         |                    |
| 6.1                                                                                                         | <b>BIODIVERSITY RISKS AND IMPACTS</b><br>Impacts to biodiversity and sustainable sourcing of construction materials for the civil works will be assessed in subproject specific E&S instruments, consistent with ESS 6. The ESMF includes a negative activity list including any activities with substantial or high potential impacts to biodiversity.                                                                                                    | Same timeframe as for the preparation and implementation of the ESCOPS and site-specific ESMPs to be prepared under 1.1b above.                                                                                                                                                                                                                                                                                         | PMU within NDoE    |
| <b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                         |                    |
| 7.1                                                                                                         | <b>INDIGENOUS PEOPLES PLAN</b><br>The Recipient shall include the elements of an Indigenous Peoples Plan (IPP) in the overall project design and the SEP to be prepared under action 10.1 below.                                                                                                                                                                                                                                                           | Same timeframe as for action 10.1.                                                                                                                                                                                                                                                                                                                                                                                      | PMU within NDoE    |
| <b>ESS 8: CULTURAL HERITAGE</b>                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                         |                    |
| 8.1                                                                                                         | <b>CHANCE FINDS</b><br>a. The Recipient shall include the cultural heritage Chance Find Procedures (CFPs) in the ESMF as part of the ESCOPs and site-specific ESMPs (as required), to be prepared under action 1.1(b) above.<br><br>b. The Recipient shall require grantees and contractors to clearly demarcate significant sites and implement cultural heritage CFPs and other measures, including consultation, to avoid impacts on cultural heritage. | a. Same timeframe as for the preparation and implementation of the ESMF under 1.1a above. ESCOPs and site-specific ESMPs to be prepared on the same timeframe as 1.1b above.<br><br>b. As part of the C-ESMP(s) to be prepared under 1.1b above, and any other grantee or contractor plans prior to commencement of civil works. Supervise grantees and Contractors' E&S performance throughout Project implementation. | PMU within NDoE    |

| MATERIAL MEASURES AND ACTIONS                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | TIMEFRAME                                                                                                                                                                                                                                   | RESPONSIBLE ENTITY |
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| <b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                             |                    |
| 10.1                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>STAKEHOLDER ENGAGEMENT PLAN</b><br>The Recipient shall adopt and implement the SEP, consistent with ESS 10, which includes measures to, <i>inter alia</i> , 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, and reporting back to stakeholders on SEP during Project implementation. The Recipient shall review and update the SEP early in project implementation and thereafter review and update the SEP during implementation, as and when required.                                                                                                                                                                                                                                                                     | The SEP (dated January 2025) has been prepared, adopted and disclosed and will be reviewed and updated within six (6) months of project effectiveness and thereafter implemented throughout project implementation.                         | PMU within NDoE    |
| 10.2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <b>PROJECT GRIEVANCE MECHANISM</b><br>a. The Recipient shall establish, publicize, maintain, and operate an accessible GM, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS 10.<br><br>b. The GM shall be equipped to receive, register, and facilitate the resolution of GBV and SEA/SH complaints, including through the referral of survivors to relevant GBV service providers, all in a safe, confidential, and survivor-centered manner. The GM will be reviewed and updated during early project implementation to include details of how reports of GBV will be received, resolved, and documented. | a. Maintain and operate the Project's GM established through the project's SEP (dated January 2025) throughout project implementation.<br><br>b. The GM will be updated and operationalized within six (6) months of project effectiveness. | PMU within NDoE    |
| <b>INDICATORS FOR IMPLEMENTATION READINESS</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                             |                    |
| The following actions are indicators for implementation readiness:<br><br>Action A(a) – PMU established and E&S Specialist and the Gender and GBV Specialist hired.<br>Action A(b) – PDoE PPOs established, and Community Engagement and E&S Officers hired.<br>Action B – Capacity building plan prepared.<br>Action 1.1(a) - ESMF reviewed and updated.<br>Action 1.1(c) – E&S included in ECE activities grant manual (subcomponent 1.2).<br>Action 1.1(d) – E&S included in schools infrastructure grants manual (subcomponent 3.3).<br>Action 2.2 - Project workers' GM operationalized.<br>Action 10.1 – Project SEP reviewed and updated.<br>Action 10.2(a) –Project GM operationalized.<br>Action 10.2(b) – Project GM updated to include details of how GBV reports will be received, resolved, and documented. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                             |                    |