

**International Committee of the Red Cross (ICRC)
Myanmar Community Livelihood Assistance
Project (MCLAP) (P181475)**

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

Draft for consultation

October 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The International Committee of the Red Cross (ICRC) (the Recipient) will implement Component 3 under the Myanmar Community Livelihood Assistance Project (the Project), as set out in the respective Grant Agreement. The International Development Association (the Association), acting as the administrator of the Japan Social Development Fund, has agreed to finance the Project (P181475), as set out in the referred agreement. The present ESCP shall apply to the financing for the project referred above.
2. From here on, Component 3 under the Project will be defined as “Respective Part of the Project” in this document.
3. The Recipient shall ensure that the Respective Part of the Project are 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 extent and mode of [World Bank/Bank/Association]’s monitoring with respect to environmental and social performance will be proportionate to the potential environmental and social risks and impacts of the Project. The ESCP is a part of the Grant Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
4. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Respective Parts of 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[s], the [Borrower/Recipient] shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
5. 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 Recipient and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient. The Recipient shall promptly disclose the updated ESCP.
6. 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
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain a E&S team at the ICRC Delegation (one E&S Focal Point each in the EcoSec and WatHab Departments) and the sub-delegations (Technical Field staff working on E&S issues) to ensure proper management of E&S risks.</p>	<p>ICRC will assign E&S Focal Points in the EcoSec and WatHab Departments before activities begin. This organizational structure should be maintained throughout Respective Parts of the Project implementation. ICRC Sub-Delegations will assign relevant Technical Field staff to manage E&S risks before Respective Part of the Project activities begin and throughout implementation.</p>	<p>ICRC Delegation (Yangon)</p> <p>ICRC Sub-delegations (Regions)</p>
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Training to be provided to the ICRC Delegation and sub-delegation level E&S Focal Points on:</p> <ul style="list-style-type: none"> • The World Bank Environmental and Social Framework (ESF) policy – with focus on the E&S Standards that are relevant to the Respective Parts of the Project • The ESMF and approach: Identification and assessment of E&S risks, selection and application of risk management measures and plans, labor management procedures, E&S monitoring and reporting, incident and accident reporting. • Application of SEP and the grievance mechanism • E&S monitoring and reporting as relevant <p>Training to be provided to any implementing partners on:</p> <ul style="list-style-type: none"> • Application of SEP and the grievance mechanism • Application of ESMF, including labor management procedures, Code of Conduct, incident reporting, SEA/SH, COVID-19 prevention and • Application of ECOPs as relevant 	<p>Before commencement of activities and throughout implementation, as needed</p>	<p>ICRC Delegation (Yangon)</p> <p>ICRC Sub-delegations (Regions)</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> E&S monitoring and reporting as relevant 		
MONITORING AND REPORTING			
C	<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 Respective Part of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s). These will be included as a specific section in the regular implementation reporting.</p>	<p>Quarterly throughout implementation, with the first report to be submitted within 45 days following the end of the first quarter of Respective Parts of the Project Implementation (same time frame as overall reporting, 5 months after the Effective Date).</p>	<p>ICRC HQ Geneva (GVA)</p>
D	<p>CONTRACTORS' AND IMPLEMENTING PARTNERS' REPORTS</p> <p>Require contractors, supervising firms and Implementing Partners to provide regular monitoring reports on ESHS performance in accordance with ICRC procurement policies and supplier code of conduct, and at the Association's request, submit such reports to the Association, redacted to remove Personal Data.</p>	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors and Implementing Partners throughout Project implementation. Upon request, submit Contractors' and Implementing Partners' reports to the Association within 14 days following the Association's request.</p>	<p>ICRC Delegation (Yangon)</p> <p>ICRC Sub-delegations (Regions)</p>
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Association of any incident or accident related to the Respective Parts of 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 sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request.</p> <p>Provide a report to the Association with sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p>	<p>ICRC HQ GVA</p>

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	that are planned to be taken to address it, and any information provided by any Contractor and/or Implementing Partner, as appropriate.	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. Depending on the circumstances, this timeframe may be extended with the written agreement of the Association.	
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>1. Adopt and implement Environmental and Social Management Framework (ESMF) prepared for the Respective Part of the Project, consistent with the relevant ESSs and in a manner acceptable to the Association.</p> <p>2. Screen any proposed subprojects for relevant activities in accordance with the ESMF prepared for the Respective Part of the Project. Screening process will include the exclusion list and screening checklist, and thereafter draft, adopt, and implement the Environmental Codes of Practice (ECOPs) or the subproject Environmental and Social Management Plan (ESMP) if required, in a manner acceptable to the Association. ESMPs prepared for relevant community infrastructure subprojects will be consulted with affected people, in accordance the ESMF and SEP prepared for the Respective Part of the Project.</p>	<p>1. Adopt ESMF before Respective Part of the Project activities begin and thereafter implement the ESMF throughout implementation.</p> <p>2. For selected activities agreed upon in the ESMF, if an ESMP is required after screening of proposed community infrastructure subprojects, ESMPs will be adopted by the Recipient before subproject activities begin. The first 5 Screening Forms and the first 5 ESMPs will be submitted to the World Bank for Prior Review. Once adopted, the ESMPs shall be implemented throughout implementation.</p> <p>ECOPs to be adopted prior to commencement of small-scale construction activities and implemented throughout implementation.</p>	<p>ICRC Delegation (Yangon)</p> <p>ICRC Sub-delegations (Regions)</p>
1.2	<p>MANAGEMENT OF CONTRACTORS AND IMPLEMENTING PARTNERS</p>	<p>Incorporate relevant aspects of the ESCP into procurement documents prior to launching the bidding process for new contracts or amend existing contracts with contractors before start of activities and ensure compliance throughout implementation.</p>	<p>ICRC Delegation (Yangon)</p> <p>ICRC Sub-delegations (Regions)</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors and subcontractors. Provide training and awareness raising for the contractors on the relevant E&S instruments and requirements. Thereafter ensure that the contractors and subcontractors comply with the E&S specifications of their respective contracts, and work to resolve issues as they are identified.</p> <p>At the Association’s request, provide copies of the relevant contracts with contractors/subcontractors and implementing partners with the Association, redacted to remove Personal Data and confidential business information.</p>	Share copies of relevant contracts with the Association within 14 days of the Association’s request, unless otherwise agreed to with the Association.	
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the capacity building, training, and any other technical assistance activities under the Respective Part of the Project are carried out consistent with the ESSs.</p>	Throughout implementation.	<p>ICRC Delegation (Yangon)</p> <p>ICRC Sub-delegations (Regions)</p>
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES Adopt and implement the Labor Management Procedures (LMP) for the Respective Part of the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, UXO/landmine risks, grievance arrangements for Respective Part of the Project workers, and applicable requirements for contractors, subcontractors and Myanmar Red Cross Society (MRCS).</p>	Adopt the LMP prior to engaging Respective Part of the Project workers and thereafter implement the LMP throughout implementation.	<p>ICRC Delegation (Yangon)</p> <p>ICRC Sub-delegations (Regions)</p>
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Inform all workers of the availability of hotlines for community feedback in their local area and that, through this channel, any work-related grievance, including violations of the LMP and ESS2 in general, can be raised. Any allegations or complaints related to possible violations of ICRC’s Code of Conduct (CoC) and Human Resources Policy received by a hotline operator would be escalated to the Ethics, Risk and Compliance Office (ERCO) at ICRC’s HQ for investigation in accordance with the rules and procedures set out in the CoC Operational Guidelines, including the rules of confidentiality and discretion as described in the LMP and consistent with ESS2.</p>	Operationalize the grievance mechanism prior to engaging Respective Part of the Project workers and thereafter maintain throughout implementation.	<p>ICRC Delegation (Yangon)</p> <p>ICRC Sub-delegations (Regions)</p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS</p>	Throughout implementation.	ICRC Delegation (Yangon)

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	Implement measures to manage waste and hazardous materials during construction and operation, consistent with ESS3 and the ESMF and respective ESMPs and ECOPs if prepared under action 1.2 above.		ICRC Sub-delegations (Regions)
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESMPs if prepared under action 1.2 above.	Same timeframe as for the preparation and implementation of the ESMPs in 1.2	ICRC Delegation (Yangon) ICRC Sub-delegations (Regions)
3.3	MANAGEMENT OF HEALTHCARE WASTE Implement measures to manage healthcare waste during construction and operation, consistent with ESS3, the ESMF and the respective ECOPs.	Throughout implementation.	ICRC Delegation (Yangon) ICRC Sub-delegations (Regions)
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Respective Part of the Project activities including behavior of workers; traffic and road safety risks; overall conflict and security risks (including UXO/landmine risks); COVID-19 risks; community exposure to noise and dust from construction and demolition activities; ensuring that individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, have access to the development benefits resulting from the Respective Part of the Project; and preventing and responding to sexual exploitation and abuse, and sexual harassment.	Adopt relevant measures in the ECOPs or adopt the ESMP (for subprojects that require the adoption of such ESMP under the ESMF) before commencement of subproject activities Once adopted, implement the respective ECOPs or ESMPs throughout implementation.	ICRC Delegation (Yangon) ICRC Sub-delegations (Regions)
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	LAND USE Implement and document the land screening and due diligence procedures included in the ESMF, in Annex 5 on Voluntary Land Donation Procedures to ensure that the Recipient will only use land for the Project activities through voluntary land donation.	Throughout implementation.	ICRC Delegation (Yangon) ICRC Sub-delegations (Regions)
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY Implement measures to manage potential impacts and risks on biodiversity, and the ecological function of habitats consistent with ESS6 and the ESMF and respective ESMPs and ECOPs if prepared under action 1.2 above.	Same timeframe as for the preparation and implementation of the ECOPs and ESMPs in 1.2.	ICRC Delegation (Yangon) ICRC Sub-delegations (Regions)

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ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	<p>INDIGENOUS PEOPLES</p> <p>The Respective Part of the Project shall be carried out in accordance with the applicable requirements of ESS7, including, inter alia: (i) ensuring that the Stakeholder Engagement Plan (SEP) includes meaningful consultations with indigenous peoples throughout Respective Part of the Project implementation; (ii) implementing procedures, protocols and/or other measures to ensure that indigenous peoples have access to Respective Part of the Project benefits in an fair, equitable, inclusive and culturally appropriate manner, as set out in the ESMF and the SEP; and (iii) implementing measures to ensure that indigenous peoples are able to access the Respective Part of the Project’s grievance mechanism in a culturally appropriate manner.</p>	Throughout implementation.	<p>ICRC Delegation (Yangon)</p> <p>ICRC Sub-delegations (Regions)</p>
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS</p> <p>Adopt and implement the chance finds procedure described in the ESMF developed for the Respective Part of the Project if applicable.</p>	Throughout implementation.	<p>ICRC Delegation (Yangon)</p> <p>ICRC Sub-delegations (Regions)</p>
ESS 9: FINANCIAL INTERMEDIARIES			
Not relevant.			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN</p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP) for the Respective Part of the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p>	Adopt and disclose the SEP prior to Respective Part of the Project appraisal and thereafter implement the SEP throughout implementation.	<p>ICRC Delegation (Yangon)</p> <p>ICRC Sub-delegations (Regions)</p>
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall escalate any SEA/SH complaints in the Respective Part of the Project context to ICRC’s global Ethic, Risk and Compliance Office (ERCO) where established procedures would be followed.</p>	Throughout Implementation.	<p>ICRC Delegation (Yangon)</p> <p>ICRC Sub-delegations (Regions)</p>
INDICATORS FOR IMPLEMENTATION READINESS			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>The following actions are indicators for implementation readiness:</p> <ul style="list-style-type: none"> A – Organizational Structure 1.1 – Environmental and Social Instruments (ESMF) 2.1 – Labor Management Procedures (LMP) 2.2 – Grievance Mechanism for Project Workers 10.1 – Stakeholder Engagement Plan (SEP) 10.2 – Project Grievance Mechanism 		