

TEMPLATE

February 2022

Democratic Republic of São Tomé and Príncipe STP DIGITAL PROJECT - P177158

Draft ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

March 30, 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

- The Democratic Republic of São Tomé an Príncipe (the Recipient) will implement the STP Digital Project - P177158 (the Project), with the involvement of the following Ministries: Ministry of Finance, Trade and Blue Economy, and The Ministry of Infrastructure and Natural Resources, and the Fiduciary Agency for Project Administration (AFAP) will be the agency within the Ministry of Finance and Blue Economy that shall carry out the fiduciary and environmental and social management of the Project, as set out in the Financing Agreement. The International Development Association (the Association), has agreed to provide financing (P177158) for the Project, as set out in the referred agreement(s).
- 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 Financing Agreement. Unless otherwise

defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).

- 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) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
- As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through AFAP 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.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
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 instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanisms.</p>	Every 3 months starting from the Effective Date and throughout the Project implementation.	MINR
B	<p>INCIDENTS AND ACCIDENTS</p> <ul style="list-style-type: none"> • Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury [specify other examples of incidents and accidents, as appropriate for the type of operation]. Provide sufficient detail regarding the scope, severity, and possible causes of 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/or supervising firm, as appropriate. 	Immediately, and in any case no later than 48 hours after the Recipient or any of the participating agencies or units becomes aware of such accidents or incidents. AFAP shall provide an incident and accident report within a period acceptable to the Association.	MINR

	<ul style="list-style-type: none"> Subsequently, at the Association's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence. 		
C	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS 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 Association [upon request] as annexes to the reports to be submitted under action A above.	Contractors and Supervision Firms
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain a PIU with qualified staff and resources to support management of ESHS risks and impacts of the Project [including] One (1) Environmental and One (1) Social Development specialist.</p>	Environment and Social Development specialist hired no later than 60 days after effective date of the Project and maintained throughout Project implementation.	MINR
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <ul style="list-style-type: none"> Prepare, consult upon, disclose, and implement environmental and social risk management instruments, including: Stakeholder Engagement Plan (SEP); Draft Environmental and Social Framework (ESMF) including as annexes Labor Management Procedures (LMP), GBV/SEA/SH Assessment and Action Plan, Codes of Practice for E-Waste Management; and Security Risk Assessment; Biodiversity Management Framework (BMF); Update the draft ESMF to include the notification from the STP Environmental Authorities confirming that the cable landing sites at Praia Melao and Praia Santo Antonio are not known to be marine turtle nesting sites. Environmental and Social Impact Assessments (ESIAs) including Critical Habitat (CHA) Assessment, ESMP and Biodiversity Management Plan (BMP); and Resettlement Policy Framework (RPF). Screen any proposed subprojects in accordance with the Environmental and Social Management Framework (ESMF) prepared for the Project and, thereafter, prepare, adopt, and implement the subprojects needed E&S instruments, including among others: Construction-Environmental and Social Management Plans (C-ESMPs); 	<p>A Draft ESMF and a draft RPF should be prepared by Appraisal. Final ESMF, including annexes, and final RPF consulted upon, and disclosed by Effectiveness, and implemented throughout the Project implementation.</p> <p>Update and disclose the draft ESMF with the notification from the STP Environmental Authorities before completion of negotiations.</p> <p>A ESIA including CHA, ESMP, BMP shall be prepared, consulted upon and disclosed before launching bidding documents for the cable laying operation.</p> <p>C-ESMPs, GBV APs, WMPs, and OHSMPs shall be submitted for Bank approval and disclosed prior to contract signature - contractor can update prior</p>	MINR

	<ul style="list-style-type: none"> • GBV/SEA/SH Action Plans (GBV APs); • Waste Management Plans (WMPs); • Occupational Health and Safety Management Plans (OHSMPs); • Resettlement Action Plans (RAPs). • The Construction-Environmental and Social Management Plans (C-ESMP) and OHSMP must include provisions to address COVID-19 risk as well as to address the Project SEA/SH-related risks ethically and adequately. These plans need to include Code of Conduct (CoC) that specifically prohibit SEA/SH and include applicable sanctions, and implement the following instruments, where applicable, in a manner acceptable to the Bank. 	to initiating construction. RAPs prepared, approved, and disclosed prior to commencement of the respective subprojects. Once approved, all instruments shall be implemented throughout subproject implementation.	
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <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 ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p>	The relevant ESHS measures shall be incorporated into the procurement documents before launching the procurement process for the relevant Project activities and shall thereafter be complied with throughout the implementation of such activities.	MINR
1.4	<p>TECHNICAL ASSISTANCE</p> <p>The Recipient shall ensure that (i) the consultancies, studies, and any other technical assistance activities under the project are carried out in accordance with terms of reference acceptable to the Association, that incorporate the relevant requirements of the ESSs; and (ii) outputs of the Project, including, but not limited to, the preparation of environmental and social instruments for the Project, are prepared and/or delivered in a manner acceptable to the Association and duly incorporate and take into consideration the relevant requirements of the ESSs. Such terms of reference shall be submitted to the Association for prior review and no objection.</p>	Prior to procurement of service providers/consultant services. Throughout project implementation.	MINR
1.5	<p>CONTINGENT EMERGENCY EARLY RESPONSE FINANCING</p> <ul style="list-style-type: none"> • Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements including, if applicable, CERC-ESMF/ESMF Addendum for the implementation of CERC Component, in accordance with the ESSs. • Adopt any environmental and social (E&S) 	The adoption of the CERC manual and CERC-ESMF or CERC-ESMF Addendum in form and substance acceptable to the Association is a withdrawal condition under Section [XX] of Schedule 2 of the legal agreement for the Project.	MINR

	instruments which may be required for activities under CERC Component of the Project, in accordance with the CERC Manual and CERC-ESMF or CERC-ESMF Addendum and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.	Adopt any required E&S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation.	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Prepare, consult upon, disclose, and implement Labor Management Procedures (LMP), including Occupational Health and Safety (OHS) measures taking into account COVID-19 provisions. Ensure that: (a) the relevant aspects of ESS2 apply to the Project implementation workers, consultants and PIU staff as appropriate, in accordance with the type of workers involved in the Project; (b) the Labor Management Procedures for the Project are developed all in a manner acceptable to the Association and in accordance to the local laws; and (c) All Project workers sign a code of conduct (CoC).	LMP finalized, consulted upon, and disclosed by Effectiveness, and implemented throughout the Project implementation. CoC signed before engaging project workers, and maintained throughout Project implementation.	MINR
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain, and operate a grievance mechanism for Project workers (GM-W), and for workers hired/appointed for Project implementation activities, as described in the LMP and consistent with ESS2. The workers' grievance mechanism should be sensitive to SEA/SH-related complaints and equipped to manage these complaints ethically and confidentially.	GM-W operational before the commencement of any activities, and maintained throughout the implementation of the Project.	MINR
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above, including, inter alia, measures to manage healthcare risks and waste and other types of hazardous and non-hazardous waste. The Recipient shall develop, adopt and implement a simple Code of Practices for e-Waste. The ESMF will include an assessment of how resources will be managed efficiently to minimize waste generation, harm to the marine or terrestrial environment, and the potential adverse impacts on human health. The ESMF will also include risk management procedures	Throughout Project implementation.	MINR

	to manage these issues using the mitigation hierarchy and to deal with construction debris and hazardous or non-hazardous materials that may need to be disposed of.		
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 communities' specific risks and impacts arising from Project activities, including SEA/SH risks (see below), and community transmission of COVID-19, and include these measures in the ESIA, C-ESMP to be prepared following the ESMF, in a manner acceptable to the Bank.</p>	ESIAs and C-ESMPs to be prepared and approved by the Bank prior to bidding and contract signature, respectively, and implemented throughout constructions.	MINR Contractors
4.3	<p>SEA AND SH RISKS</p> <ul style="list-style-type: none"> • Prepare, adopt, and implement a stand-alone GBV AP as part of the ESMF, to assess, manage and respond to the risks of GBV/SEA/SH. The GBV AP will be adopted and implemented in all project's implementation area. • Contractors shall reflect the requirements stated in the GBV AP in their C-ESMPs. • Funding must be available for recruitment of GBV services providers where needed to facilitate access to timely, safe and confidential services for survivors. 	<p>GBV AP prepared, consulted upon, and disclosed by Effectiveness, and implemented throughout the Project.</p> <p>As for the C-ESMPs, contractors GBV mitigation measures to be prepared and approved by the Bank prior to bidding and contract signature, respectively, and implemented throughout constructions.</p>	MINR Contractors
4.4	<p>SECURITY MANAGEMENT</p> <p>A Security Risk Assessment proportionally to the risks of the project will be prepared as part of the ESMF by the Recipient and depending of the results, a follow-up Security Management Plan (SMP) shall be prepared before project activities on the ground.</p>	SRA finalized, consulted upon, and disclosed by Effectiveness, and implemented throughout the Project implementation. If needed, SMP prepared, consulted upon and disclosed not later than 90 days after project effectiveness.	MINR
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT POLICY FRAMEWORK</p> <p>Adopt and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.</p>	A draft of the RPF should be prepared by Appraisal. Final RPF consulted, and disclosed by Effectiveness.	MINR
5.2	<p>RESETTLEMENT PLANS</p> <ul style="list-style-type: none"> • Once investment sites are identified, prepare, disclose, adopt, and implement Resettlement Action Plans (RAPs) and/or Abbreviated 	RAPs and ARAPs consulted upon, approved by the Bank, disclosed and implemented before	MINR

	<p>Resettlement Action Plans (ARAPs) following ESS5 and consistent with the requirements of the RPF that has been prepared for the Project.</p> <ul style="list-style-type: none"> • Thereafter adopt and implement the respective RAPs/ARAPs before carrying out the associated activities, in a manner acceptable to the Bank. No works will commence prior to the implementation of appropriate risk management instruments. Resettlement related expenditures will be financed by the government. 	<p>commencing Project activities that involve land acquisition and resettlement.</p>	
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <ul style="list-style-type: none"> • As part of the ESMF, develop, consult upon, disclose and implement BMF that will include a detailed information on key species, habitats and landscapes and the approach to be adopted by the Borrower in relation to the assessment, mitigation and management of biodiversity issues and impacts. • Conduct a fine-scale mapping of turtle nesting sites and other habitats at a depth of at least 25 m at the fiber optic cable lading sites in Sao Tome Island and Principe Island. • As part of the ESIA, develop, consult upon and disclose and implement a Critical Habitat (CHA) Assessment, ESMP and Biodiversity Management Plan (BMP). • A site-specific ESMP and other environmental and marine baseline assessment shall be developed by the recipient to avoid, minimize and mitigate the potential negative impacts on marine biodiversity that may arise from certain project activities. • As the technical drawing will only be available during project implementation, a specific Environmental and Social Impact Assessment (ESIA) will be prepared, which should include reasonably detailed biodiversity baselines, alternative analysis, consultation and licensing, impact assessment that will lead to a robust Biodiversity Management Plan. 	<p>BMF finalized, consulted upon, and disclosed by Effectiveness, and implemented throughout the Project implementation.</p> <p>Study on turtle nesting sites prepared, consulted and disclosed before completion of the Technical Design for the submarine cable and related infrastructure.</p> <p>ESIA prepared, approved, disclosed and consulted before launching bidding documents for the cable laying operations.</p> <p>Site-specific ESMP and E&S baseline assessment prepared and approved no later than 60 days after project effectiveness.</p>	MINR
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	<p>This standard is not relevant currently as there are no distinct social and cultural groups have been identified in accordance with ESS7 and in the national context in the project area.</p>	Not Applicable	Not Applicable
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS</p> <p>Prepare, adopt, and implement the chance finds procedure described in the ESMF prepared for the</p>	<p>Same timeframe as for the preparation and implementation of the C-</p>	MINR Contractors

	Project. The procedure shall be included in all C-ESMP to be prepared under action 1.3, and appropriately implemented throughout the execution of all construction works related to the Project, including excavations, demolition, movement of earth, or other changes in the physical environment.	ESMPs.	
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	This standard is not relevant currently as there are no distinct social and cultural groups have been identified in accordance with ESS7 and in the national context in the project area.	Not Applicable	
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <ul style="list-style-type: none"> • Prepare, consult upon, disclose and adopt a Stakeholder Engagement Plan (SEP) in line with ESS10 requirements. Any stakeholder feedback shall be reviewed and incorporated into the SEP, as appropriate. If significant changes are made to the SEP, the revised version shall be publicly disclosed. • Ensure that technical assistance activities carried out under the project implementation incorporate stakeholder engagement and information disclosure in a manner consistent with the ESS10. • Report stakeholder feedback as part of quarterly reports. 	<p>SEP prepared, consulted upon, and disclosed prior to Project appraisal, and implemented throughout the Project.</p> <p>Update SEP, as appropriate, and publicly disclose and implement revised versions throughout Project implementation.</p> <p>Stakeholder feedback report on a quarterly base.</p>	MINR
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <ul style="list-style-type: none"> • Prepare, adopt, operate and maintain, a project-level GM. The GM shall include GBV/SEA/SH-specific procedures to manage and resolve GBV/SEA/SH-related claims ethically and confidentially and contain an appropriate response protocol for such claims. • Receive and resolve any complaints submitted in relation to the project, in accordance with ESS10, and in a manner acceptable to the Association. • Report on claims presented and status/response as part of quarterly reports. • Prepare, adopt, operate and maintain an appropriate GM for the demographic census. 	<p>GM design to be finalized prior to effectiveness, and GM to be operational by 60 days after effectiveness. GM maintained and implemented throughout Project implementation. Claims report submitted on a quarterly base.</p> <p>Census GM to be operational before the starting of the census, and implemented through out the census.</p>	MINR
CAPACITY SUPPORT			
CS1	<p>Prepare and submit to the Bank an annual capacity building plan. The trainings should include the following among others:</p> <ul style="list-style-type: none"> • Assessment, management and supervision of the Project risks and impacts; • Development, implementation and supervision of the SEP; 	Annual capacity building plan will be developed and approved within 45 days after Project effectiveness date, and updated and implemented throughout Project implementation.	MINR

	<ul style="list-style-type: none"> • Labour management procedures; • GBV/SEA/SH issues; • OHS; • Involuntary Resettlement; • Grievance Mechanisms; • Environmental and social monitoring and reporting; • GEMS. 		
CS2	<p>Training for Project workers on occupational health and safety, including on emergency prevention and preparedness and response arrangements to emergencies, and community health and safety, including GBV/SEA/SH risk mitigation and response as well as specific aspects of environmental and social assessment and management.</p>	<p>For direct workers within three months after Project effectiveness and maintain, as necessary, throughout Project implementation.</p> <p>For contracted workers prior to initiating construction activities and during their execution, as necessary.</p>	MINR Contractors