

**Government of the Federated States of  
Micronesia**

**DOFA as PPA Implementing Entity**

**Programmatic Preparation Advance  
No. IDA P176918-FM**

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

**June 2021**

**GoFSM/PPA Implementing Entity  
Programmatic Preparation Advance (“PPA”)**

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

1. The Government of the Federated States of Micronesia (GovFSM) will implement the Programmatic Preparation Advance (the **PPA**), with the involvement of the Department of Finance and Administration (DoFA) Central Implementation Unit (CIU). The International Development Association [“**the Association**”] has agreed to provide financing for the PPA.
2. GovFSM will implement material measures and actions so that the PPA is implemented in accordance with the World Bank Environmental and Social Standards (“**ESS**”s). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. GovFSM will also comply with the provisions of any other E&S documents required under the ESF referred to in this ESCP and the timeline specified in those E&S documents.
4. GovFSM is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the CIU.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by GovFSM as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the GovFSM and the Association, this ESCP may be revised from time to time during PPA implementation, to reflect adaptive management of PPA changes and unforeseen circumstances or in response to assessment of PPA performance conducted under the ESCP itself. In such circumstances, GovFSM or delegate(s) will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the GovFSM or delegate(s). The GovFSM will promptly disclose the updated ESCP.
7. Where PPA changes, unforeseen circumstances, or PPA performance result in changes to the risks and impacts during PPA implementation, the GovFSM shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES & ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>MONITORING &amp; REPORTING</b>			
A	<p><b>REGULAR REPORTING:</b></p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) and labor management performance of the PPA, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&amp;S documents required under the ESCP, ESHS incidents and functioning of the grievance mechanism(s).</p>	Six-monthly, throughout PPA implementation.	Central Implementation Unit (CIU) – Safeguard Team
B	<p><b>INCIDENTS &amp; ACCIDENTS:</b></p> <p>Promptly notify the Association of any incident or accident related to the PPA, which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers. Provide sufficient details regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by the contractor and supervising entity, as appropriate. Subsequently, as per the Association’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence. These activities are outlined in the PPA Grievance Mechanism (GM).</p>	Notify the Association within 48 hours after learning of the incident or accident. A report would be provided to the Association, as requested.	Central Implementation Unit (CIU) – Program Manager &/or Safeguards Team.
<b>EES 1: ASSESSMENT &amp; MANAGEMENT OF ENVIRONMENTAL &amp; SOCIAL RISKS &amp; IMPACTS.</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE:</b></p> <p>Establish and maintain an organizational structure with qualified staff and resources to support management of E&amp;S risks including maintaining a Safeguards team in the Central Implementation Unit (CIU) to provide ongoing support, advice and monitoring to the Project. Recruitment of part time consultants as required to undertake specific Project work activities (e.g., technical advisory) and/or assistant in state activities.</p>	<p>At least two (2) full time equivalent staff will be retained in the CIU safeguards team for the duration of the PPA.</p> <p>Additional part time technical consultants (national and/or international) to be hired and retained on an as-required basis.</p> <p>CIU to review and approve all TOR for activities which could carry environmental and/or social risks and for the preparation of instruments and other activities relating to the WB ESF.</p>	Central Implementation Unit (CIU) – Program Manager &/or Safeguard team.
1.2	<p><b>ENVIRONMENTAL &amp; SOCIAL ASSESSMENT:</b></p> <p>Adopt, implement and update the environmental and social risk management instruments as required throughout the PPA implementation in a manner acceptable to the Association. Ensure compliance to WB ESF.</p>	Adopt, implement and update the Environmental and Social Safeguard instruments throughout the PPA Implementation.	Central Implementation Unit (CIU) – Safeguard team.
1.3	<p><b>MANAGEMENT OF TECHNICAL ADVISORY CONTRACTS:</b></p> <p>Incorporate the relevant aspects of this ESCP, including the relevant aspects of the Stakeholder Engagement Plan (SEP) and the Labor Management Procedures (LMP), into all Terms of Reference (TOR). Thereafter ensure that the approaches</p>	Prior to the preparation of procurement documents. Supervise consultants throughout Project implementation.	Central Implementation Unit (CIU) – Safeguard team.

MATERIAL MEASURES & ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	and outputs of the consultants (individual or Firms) comply with the terms of reference.		
	<b>MANAGEMENT TOOLS AND INSTRUMENTS:</b> Adopt, implement and update environmental and social management tools and instrument as required throughout the PPA implementation in a manner acceptable to the Association. Ensure compliance to WB ESF.	Maintain documents throughout Project implementation.	Central Implementation Unit (CIU) – Safeguard team.
	<b>PERMIT, CONSENTS AND AUTHORIZATIONS:</b> Develop and acquire any permits, consents and authorizations applicable to the PPA from relevant Government (National, State and Municipal) and traditional - customary authorities and manage compliance.	Acquire and maintain documents throughout PPA implementation.	Central Implementation Unit (CIU) – Safeguard team.
<b>EES 2 LABOR &amp; WORKING CONDITIONS</b>			
2.1	<b>LABOR MANAGEMENT PROCEDURES</b> Adopt, implement and update the Labor Management Procedures (LMP) in a manner acceptable to the Association. Refer PPA Labor Management Procedures (LMP).	Adopt, implement and update the Labor Management Procedures (LMP) throughout PPA Implementation.	Central Implementation Unit (CIU) – Safeguard team.
2.2.	<b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b> Adopt, maintain, and operate a grievance mechanism for PPA project workers/consultants, as described in the Labor Management Procedures (LMP) and consistent with ESS2.	Adopt, implement and update the Grievance Mechanism throughout PPA Implementation.	Central Implementation Unit (CIU) – Safeguard team.
2.3	<b>OCCUPATIONAL HEALTH &amp; SAFETY (OHS) MEASURES</b> Screening of OHS risks will be conducted and Job Safety Analyses prepared prior to site visits as per the LMP. Specific issues may relate to working in remote areas, travelling in small water craft, working on road edges at risk of vehicle collisions, working around commercial ports, working in the heat, protection from diseases (including COVID) and illnesses.	Adopt, implement and update OH&S measures throughout PPA Implementation.	Central Implementation Unit (CIU) – Safeguard team.
2.4	<b>WORKERS CODE OF CONDUCT</b> Adopt, implement and update the PPA code of conduct (provided by CIU – training) to all project workers (direct and/or contracted) identified by the CIU as identified in the PPA documents.	Develop and implement training prior to the commencement of works throughout the PPA implementation.	Central Implementation Unit (CIU) – Safeguard team.
2.5	<b>Project workers (direct and/or contracted) Training</b> Adopt, implement and update the Projects code of conduct for workers (advisors) as in the Projects documents.	Adopt, implement (deliver) and update the Project workers training plan throughout the PPA Implementation.	Central Implementation Unit (CIU) – Safeguard team.
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>		All TOR for technical advisory will include a clause ensuring all approaches, methodologies, recommendations and outputs are in compliance with the WB ESF and	
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			

MATERIAL MEASURES & ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>		these Standards in particular, and with the WB group Environmental, Health and Safety Guidelines.  The CIU Safeguards team will review all TOR and review consultant’s outputs to confirm compliance and provide advice as required.	
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
<b>ESS 8: CULTURAL HERITAGE</b>			
<b>ESS 10: STAKEHOLDER ENGAGEMENT &amp; INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN (SEP) PREPARATION &amp; IMPLEMENTATION</b> Adopt, implement and update the Stakeholder Engagement Plan (SEP) throughout PPA implementation. Specific issues relate to engaging fully with all stakeholders including national, state and municipal governments, communities and traditional/customary leaders, civil society and business entities who may be associated with the PPA.	Adopt and implement the Projects Stakeholder Engagement Plan (SEP) throughout PPA Implementation.	Central Implementation Unit (CIU) – Safeguard team.
10.2	<b>PROJECT GRIEVANCE MECHANISM</b> Adopt, implement and update the Grievance Mechanism (GM) throughout PPA Implementation.	Adopt, implement and update the Grievance Mechanism (GM) throughout PPA Implementation.	Central Implementation Unit (CIU) – Safeguard team.
<b>CAPACITY SUPPORT (TRAINING)</b>			
CS1	Project workers (direct and/or contracted) to receive training on local culture, occupational health and safety (OHS), Project Stakeholder Engagement Plan (SEP) and Grievance Mechanism (GM), prevention of gender based violence, environmental incidents and emergency prevention and preparedness and responses to emergency situations.	As required, prior to work commencing, and throughout PPA implementation as new project workers are recruited.	Central Implementation Unit (CIU).