

# Economic Community of West African States

## Digital Transformation for Africa/ Western Africa Regional Digital Integration Program – Series of Projects 1 (WARDIP) (P176932)

**Negotiated**

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

**October 19, 2023**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Economic Community of West African States (ECOWAS) (the Recipient) shall implement the “Western Africa Regional Digital Integration Program – Series of Projects 1 (WARDIP) (P176932)” (the Project), with the involvement of the ECOWAS Commission Directorate of Digital Economy and Posts, as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the referred 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 Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred 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, 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.
4. 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 the ECOWAS Commission and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient’s designated official representative. The Recipient shall promptly disclose the updated ESCP.

| MATERIAL MEASURES AND ACTIONS   |   | TIMEFRAME  | RESPONSIBLE ENTITY  |
|---|---|--|---|
| <b>MONITORING AND 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) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&amp;S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>  | <p>Submit quarterly reports to Association throughout Project implementation, commencing three months after the Project Effective Date. Submit each report to the Association no later than 7 days after the end of each reporting period.</p>   | <p>Project Implementation Unit (PIU) to be established at ECOWAS Commission/ ECOWAS Digital Economy and Posts Directorate</p> |
| B   | <p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. 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.</p> <p>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.</p> | <p>Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>For incidents/accidents involving fatalities or SEA/SH allegations, promptly notify the Association within 24 hours.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association.</p> | <p>PIU</p>  |
| <b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b> |   |  |   |

| MATERIAL MEASURES AND ACTIONS |   | TIMEFRAME   | RESPONSIBLE ENTITY       |
|-------------------------------|---|---|--------------------------|
| 1.1                           | <p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain Project Implementation Unit (PIU) with qualified staff and resources to support management of ESHS risks and impacts of the Project, including an environmental and social development specialist with experience and qualifications acceptable to the Association.</p>  | <p>Establish and maintain a PIU no later than three months after Project Effective Date, as set out in Financing Agreement. Hire and appoint a part-time E&amp;S consultant no later than three months after the Effective Date as set out in the Financing Agreement with an E&amp;S expertise, and thereafter maintain this position throughout Project implementation.</p> | <p>ECOWAS Commission</p> |
| 1.2                           | <p><b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <ol style="list-style-type: none"> <li>1. Include E&amp;S management measures, including SEA/SH measures and the E&amp;S screening process as part of the Project Implementation Manual (PIM)</li> <li>2. Prepare, adopt, and implement, an Environmental and Social Management Plan (ESMP) for any activity for which the ESMP is required consistent with the relevant ESSs, and in a manner satisfactory to the Association.</li> </ol> | <ol style="list-style-type: none"> <li>1. Same timeframe as for the preparation of the PIM.</li> <li>2. Prepare, adopt and disclose ESMPs for any activity that request such measures before the launch of bidding thereafter implement E&amp;S measures/ESMP throughout Project implementation.</li> </ol>   | <p>PIU</p>               |

| MATERIAL MEASURES AND ACTIONS              |  | TIMEFRAME  | RESPONSIBLE ENTITY |
|--|--|--|--------------------|
| 1.3  | <p><b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association and that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>  | Throughout Project implementation.   | PIU                |
| <b>ESS 2: LABOR AND WORKING CONDITIONS</b> |  |  |                    |
| 2.1  | <p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Adopt and implement the Labor Management Procedures (LMP) for 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, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms, in line with the ECOWAS internal rules (Règlement d'ordre interieur-ROI) and ESS2.</p> | The LMP shall be prepared and disclosed by Effective date and thereafter implement the LMP throughout Project implementation.          | PIU                |
| 2.2  | <p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish, maintain, and operate a Grievance Mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>   | Establish grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation. | PIU                |

| MATERIAL MEASURES AND ACTIONS  |  | TIMEFRAME  | RESPONSIBLE ENTITY |
|--|--|--|--------------------|
| <b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>  |  |  |                    |
| 3.1  | <b>WASTE MANAGEMENT PLAN</b><br>Adopt and implement Waste Management measures (WMM), as part of the project Implementation Manual (PIM), and ESMPs to manage hazardous and non-hazardous wastes, consistent with ESS3.       | Same timeframe as for the preparation of the PIM and specific ESMPs and thereafter implement WMM throughout Project implementation.                                  | PIU                |
| 3.2  | <b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b><br>Incorporate resource efficiency and pollution prevention and management measures in the PIM, and specific ESMPs to be prepared under action 1.2 above. | Same timeframe as for the adoption and implementation of the PIM and specific ESMPs  | PIU                |
| <b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>  |  |  |                    |
| 4.1  | <b>SEA AND SH RISKS</b><br>Adopt and implement measures to prevent and manage SEA/SH issues as part of the PIM and specific ESMPs, to assess and manage the risks of SEA and SH.   | Same timeframe as for the adoption and implementation of the PIM and specific ESMPs, and thereafter implement the SEA/SH measures throughout Project implementation. | PIU                |
| <b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT NOT relevant</b>                       |  |  |                    |
| <b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES NOT RELEVANT</b>              |  |  |                    |
| <b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES NOT RELEVANT</b> |  |  |                    |
| <b>ESS 8: CULTURAL HERITAGE Not RELEVANT</b>   |  |  |                    |
| <b>ESS 9: FINANCIAL INTERMEDIARIES NOT RELEVANT</b>  |  |  |                    |
| <b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>   |  |  |                    |
| 10.1   | <b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b>  | .  | PIU                |

| MATERIAL MEASURES AND ACTIONS |   | TIMEFRAME  | RESPONSIBLE ENTITY |
|-------------------------------|---|--|--------------------|
|                               | Prepare, consult on, disclose, adopt and implement a Stakeholder Engagement Plan (SEP) for 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.  | The SEP was prepared, consult on, and disclosed in ECOWAS and on the World Bank external website on August 17, 2023  |                    |
| 10.2                          | <p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism (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 ESS10.</p> <p>The GM shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p> | Establish the GM no later than three months after the Effective Date, and thereafter maintain and operate the mechanism throughout Project implementation. | PIU                |
| <b>CAPACITY SUPPORT</b>       |   |  |                    |
| CS1                           | <p>Capacity building to be planned for PIU and relevant stakeholders on:</p> <ul style="list-style-type: none"> <li>• <b>stakeholder mapping and engagement</b></li> <li>• health and safety at work</li> <li>• grievance management</li> <li>• code of professional conduct</li> <li>• SEA/SH aspects</li> </ul>   | <i>From the first year of project implementation</i>   | PIU                |

