

Ministry of Labor and Social Protection

Mongolia Emergency Relief and Employment Support Project (P174116)

Draft

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

May 20, 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Mongolia (hereinafter the **Recipient**) will implement the Mongolia Emergency Relief and Employment Support Project (the **Project**), with the involvement of Ministry of Labor and Social Protection (MLSP). The International Development Association (hereinafter the **Association**) has agreed to provide financing for the Project.
2. The Recipient will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). 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. The Recipient is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the MLSP.
4. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by the Recipient 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.
5. As agreed by the Association and the Recipient, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Recipient 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 Recipient. The Recipient will promptly disclose the updated ESCP.
6. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	REGULAR REPORTING: 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 environmental and social documents (including the environmental and social management framework (ESMF), stakeholder engagement plan (SEP), environmental and social management system (ESMS) required under the ESCP, stakeholder engagement activities and grievances log.	Six-monthly throughout Project implementation.	MLSP/PIU
B	INCIDENTS AND ACCIDENTS: Promptly notify the Association of any environmental and social accident/incident which has, or is likely to have, 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 any 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.	Notify the Association within 48 hours after learning of the incident/accident.	MLSP/PIU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE: The Ministry of Labor and Social Protection (MLSP) shall maintain a Project Implementation Unit (PIU) with qualified staff and resources to support management of ESHS risks and impacts of the Project including the personnel with responsibilities of (i) an environmental specialist; and (ii) a social specialist	Organization structure and qualified staff maintained throughout Project implementation.	MLSP

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS</p> <p>a. Assess the environmental and social risks and impacts of proposed Project activities, in accordance with an Environmental and Social Management Framework (ESMF) to be prepared by the Recipient and cleared by the Association prior to commencement of Project activities. This ESMF will include measures to ensure that individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, have access to the development benefits resulting from the Project. The ESMF shall include (i) an asbestos management plan; (ii) health and safety protection measures for workers and communities against COVID-19; and (iii) a project-specific capacity development plan through which MLSP and PIU staff will be trained on the ESF.</p> <p>b. Prepare, disclose, adopt, and implement any environmental and social management plans or other instruments required for the respective Project activities based on the assessment process, in accordance with the ESSs, the ESMF, the ESHGs, and other relevant Good International Industry Practice (GIIP) including the WHO guidelines on COVID-19 in a manner acceptable to the Association.</p> <p>c. Incorporate the relevant aspects of this ESCP, including, inter alia, any environmental and social management plans or other instruments, ESS2 requirements, and any other required ESHS measures, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply with the ESHS specifications of their respective contracts.</p> <p>d. The Project Operational Manual (POM) and Employment Promotion Fund Manual will be revised to operationalize the heightened E&S responsibilities of the relevant parties.</p>	<p>a. Before the carrying out of the relevant Project activities.</p> <p>b. Before the carrying out of the relevant Project activities, and thereafter throughout the carrying out of such activities.</p> <p>c. Before launching the procurement process for the relevant Project activities, and thereafter throughout the carrying out of such activities.</p> <p>d. Before the carrying out of the relevant Project activities, and thereafter throughout the carrying out of such activities.</p>	<p>MLSP and PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	<p>EXCLUSIONS: Exclude the following type of activities as ineligible for financing under the Project:</p> <ul style="list-style-type: none"> • Activities that may cause long term, permanent and/or irreversible adverse environmental impacts; • Activities that have high probability of causing serious adverse effects to human health; • Activities that may cause adverse impacts on critical habitats and natural habitats; • Activities that may have significant adverse social impacts and may give rise to significant social conflict; • Activities that may affect lands or rights of indigenous people or other vulnerable minorities; • Activities that may involve any resettlement or land acquisition/use restriction or adverse impacts on cultural heritage; • All the other excluded activities set out in the ESMF of the Project. 	During the assessment process conducted under action 1.2.a. above.	MLSP and PIU
1.4	Asbestos site due diligence will be performed in line with Good International Industry Practice (GIIP).	Before planning of the General Office for Labor and Welfare Services (GOLWS) renovation.	MLSP and PIU
1.5	Microenterprises under component 2 will be screened against environmental and social criteria listed in the ESMF.	Throughout Project implementation.	MLSP and PIU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT: The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Association, including through, inter alia, implementing adequate occupational health and safety measures (including emergency preparedness and response measures), setting out grievance arrangements for Project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.</p>	Throughout Project implementation.	MLSP and PIU
2.2	The Recipient shall prepare, adopt and implement a Labor Management Plan (LMP) to be cleared by the Association.	LMP to be adopted before engaging project workers in Project activities and thereafter implemented throughout Project implementation.	MLSP

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.3	The Recipient shall implement adequate occupational health and safety measures (including emergency preparedness and response measures) in line with the ESMF, the applicable requirements of ESS2, the ESHGs and other relevant GIIP including the WHO guidelines on COVID-19 in all facilities of the Project.	Throughout Project implementation.	MLSP and PIU
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 health care wastes, asbestos-containing materials, and other types of hazardous and non-hazardous wastes. Microenterprises that pose substantial environmental pollution shall be excluded during the environmental screening process as set out in the ESMF and ESMS. The environmental screening should also identify the key ESS3 related issues associated with operation of the microenterprises, and the action plan and timeline required (in the form of ESCP) shall be prepared and agreed with representatives of microenterprises to comply with applicable Mongolian pollutant emission standards and the requirements of the World Bank's general and industry-specific EHS guidelines.		
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above including, inter alia, measures to: minimize the potential for community exposure to communicable diseases; ensure that individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, have access to the development benefits resulting from the Project; manage the risks of the use of security personnel; manage the risks of labor influx; and prevent and respond to sexual exploitation and abuse, and sexual harassment.		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	Not relevant.		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above. This standard is not relevant to this Project.		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above.		
ESS 8: CULTURAL HERITAGE			
8.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above.		
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above. Each participating financial institution (PFI) shall establish and maintain an Environmental and Social Management System (ESMS) proportionate to the Environmental and Social risks associated with activities for which Project funds may be used, which will be applied to all subprojects administered under the Project. The financial institution shall ensure adequate institutional arrangement for ESMS implementation, including a designated senior management representative to have overall accountability for environmental and social performance of subprojects. Representative from the PFI will be part of the selection committee established by the local labor and social welfare offices. The financial institution and subproject microenterprises shall establish and maintain a labor management procedure consistent with the requirements in ESMS and ESS2, which includes a responsive grievance mechanism for workers.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
10.1 STAKEHOLDER ENGAGEMENT PLAN: Update, disclose, adopt, and implement the preliminary Stakeholder Engagement Plan (SEP) used for project appraisal consistent with ESS10, in a manner acceptable to the Association. Specifically, the MLSP through PIU, in partnership with LWSOs, commits to update and then implement the stakeholder engagement plan and ensure adequate financial resources are allocated from the project. If necessary, the PIU will outsource temporary technical person/people to plan and organize a training for LSWO in districts and provinces consistent with ESS10.	A preliminary SEP was already prepared and shall be updated and disclosed no later than 30 days following the Effective Date. The SEP shall be implemented throughout the Project implementation.	MLSP and PIU
10.2 GRIEVANCE MECHANISM: Accessible grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Association.	Throughout Project implementation.	MLSP and PIU
CAPACITY SUPPORT (TRAINING)		
CS1 Training to MLSP, PIU and financial institution's staff on: <ul style="list-style-type: none"> • World Bank's Environmental and Social Framework (ESF); • Environmental and social management procedure per ESMF (throughout subproject screening, preparation, approval and implementation); • Stakeholder mapping and engagement per SEP. 	Throughout Project implementation.	MLSP and PIU
CS2 Training on asbestos management and occupational health and safety for contractors, workers, supervision consultants, and relevant government officials.	Throughout Project implementation.	MLSP and PIU
CS3 Training to all personnel involved in the implementation of Project activities on: <ul style="list-style-type: none"> • WHO's guidelines on COVID-19 infection prevention and control; • Risk communication and community engagement; 	Throughout Project implementation.	MLSP and PIU