



REPUBLIQUE ISLAMIQUE DE MAURITANIE

Ministère du Pétrole, des Mines et de l'Energie (MPME)
Société Mauritanienne d'Electricité (SOMELEC)

Regional Electricity Access and Battery Energy Storage Systems (ECOREAB) P167569

Draft for Negotiation

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

March 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. *The Government of the Islamic Republic of Mauritania (hereinafter the Recipient)* will implement the *Regional Electricity Access and Battery-Based Energy Storage System (ECOREAB)* Project with the involvement of the Ministère du Pétrole, des Mines et de l'Énergie (MPME) and the Société Mauritanienne d'Electricité (SOMELEC). 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* will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Management Plan (ESMP), Resettlement Policy Framework (RPF), and Stakeholder Engagement Plan (SEP), and the timelines specified in those E&S documents. Additional instruments can be developed during implementation, such as environmental and social impact assessments (ESIA) and environmental and social management plans (ESMP) (including Action Plans for prevention, mitigation, and responses to the risks of sexual exploitation and abuse/sexual harassment) and violence against children (VAC), Resettlement Action Plans an/or livelihood restoration plans, as well as the timetables indicated in these documents. Also, the Association will monitor and assess the progress and achievement of material measures and actions throughout the implementation of the project.
4. *The Recipient* is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by *The Government of the Islamic Republic of Mauritania* 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 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 Government of the Islamic Republic of Mauritania* 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 Government of the Republic of Mauritania*. *The Government of the Republic of Mauritania* will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, *Recipient* shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include *environmental, health, and safety impacts including COVID-19 transmission risks, labor influx, physical and economic displacement, and gender-based violence*.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the implementation of the ESCP in form and substance satisfactory to the Association, which shall provide an update on the environmental, social, health, and safety (ESHS) performance of the Project; including the status of compliance with the requirements under the ESCP, including the preparation and implementation of the safeguards measures and instruments mentioned below in 1.3; stakeholder engagement activities, and a functioning grievance redress mechanism.</p>	<p><i>A project progress report will be submitted every three months during implementation.</i></p>	<p><i>The Project Implementation Unit (PIU)</i></p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association any incident or accident related to, or having an impact on the Project, which has or is likely to have adverse repercussions on the environment, the affected communities, the public, or workers, including, but not limited to, any allegations of sexual exploitation and abuse, sexual harassment, violence against children (including child labor) and work-related accidents or deaths related to the project, strikes and social unrest.</p> <p>Prepare a report, in form and substance acceptable to the Association, on the incident or accident and propose measures to prevent its recurrence.</p> <p>For incidents related to SEA/SH, only non-identifiable information will be shared (type of violence, age/sex of survivor and link to the project - if known). Any notification of an incident of SEA/SH will follow the information sharing protocol in order to respect the safety and confidentiality of the survivor.</p> <p>For guidance any fatal Project-related accidents or allegations of gender-based violence and/or Sexual Exploitation, Abuse or Sexual Harassment (SEA/SH) related to the Project is deemed serious.</p>	<p><i>Incidents or accidents shall be reported within 48 hours after having knowledge about such accidents or incidents report by using the ESIRT toolkit annexed to the Project Implementation Manual.</i></p> <p><i>The Association shall be notified in writing immediately and no later than 48 hours after becoming aware of such incidents or accidents for serious accidents, and no later than 24hours for severe accidents, including GBV incidents or fatalities, the Recipient shall, or cause the PIU, to report to the Association. An incident/accident report will be prepared within a maximum of 7 days. This notification system will be in effect throughout the Project.</i></p>	<p><i>PIU</i></p> <p><i>The Contractor</i></p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>Contractors will be required to provide the PIU with monthly monitoring reports on the implementation of environmental and social clauses.</p> <p>The Recipient will submit, upon request, the monthly monitoring reports to the Association.</p>	<i>Monthly throughout Project implementation</i>	<i>Project Implementation Unit and Contractors</i>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Maintain within the Société Mauritanienne d'Electricité (SOMELEC), an organizational structure (PIU) to manage the Project and recruit qualified personnel to manage project-related environmental and social risk. It will ensure the application of the provisions made in this ESCP and in all the safeguard documents prepared for this project.</p>	<i>Before the starting of the Project and during the entire Project life cycle</i>	<i>Project Implementation Unit</i>
1.1.1	<p>The environmental and social specialists which have been recruited for the Decentralization and Productive Intermediate Cities Support Project (P169332) will also be assigned for this project. The PIU will also recruit a gender specialist with SEA/SH experience, whose qualifications will be deemed satisfactory by the Association.</p> <p>These specialists will be responsible for drafting of the environmental and social aspects of the Procedure Manual to guide the implementation of the material measures outlined in this ESCP.</p>	<i>The current environmental specialist and social specialist in the PIU shall be maintained throughout the project lifecycle. One SEA/SH consultant, one environmental consultant, one social consultant shall be recruited no later than 3 months of project effectiveness. Staffing and shall be maintained throughout the project lifecycle.</i>	<i>Project Implementation Unit</i>
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>Carry out an environmental and social assessment to identify and assess the environmental and social risks and impacts of the Project and the appropriate mitigation measures.</p>	<i>Prior to negotiation and from time to time during implementation of the project if necessary</i>	<i>Project Implementation Unit</i>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.3 MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>As part of the environmental and social assessment of the project, the Recipient will develop, consult upon with relevant stakeholders, adopt, maintain, implement the following environmental and social risk management tools and instruments:</p> <ul style="list-style-type: none"> • Environmental and Social Management Framework (ESMF) with SEA/SH prevention and mitigation plan • Resettlement Policy Framework (RPF) • Environmental and Social Impact Assessment (ESIA) / Environmental and Social Management Plan (ESMP) (with security assessment) • Resettlement Action Plans (RAP) • Labor Management Plan (LMP) including Codes of Conduct prohibiting all acts of SEA/SH and VAC and providing for a regular training plan for workers. • Stakeholder Engagement Plan (SEP) with a Grievance Mechanism (GM) including an annex with detailed procedures for handling SEA/SH complaints in a confidential, ethical, non-discriminatory, and survivor-centered. • Waste and Hazardous Materials Management Plan (WHMMP) • If required a Security Management Plan (SMP) <p>As needed and in accordance with Mauritanian regulations and the World Bank's ESSs, will be prepared during Project implementation.</p>	<p><i>Before the start of any activity requiring the preparation of a specific safeguard instrument, and after no-objection from the Association (ESIA/ESMP, RAP, WHMMP)</i></p> <p><i>The ESMF, RPF and LMP will be disclosed prior to negotiations.</i></p> <p><i>The SEP will be disclosed prior to appraisal.</i></p>	<p><i>Project Implementation Unit</i></p>
<p>1.4 MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESMF and relevant instruments referred to in Section 1.3 above, in the OHS and environmental, social, health, and safety (ESHS) specifications of the tender documents provided to contractors and sub-contractors, including measures to combat sexual exploitation and abuse, sexual harassment, and the recruitment of minors. The Recipient will then ensure that the contractors comply with the ESHS specifications of their respective contracts, by strict monitoring and supervision of the works.</p>	<p><i>During the preparation of the tender documents and before the start of works</i></p>	<p><i>Project Implementation Unit</i></p>
<p>1.5 PERMITS, APPROVALS AND AUTHORIZATIONS:</p> <p>Obtain, or help to obtain, the permits, consents and authorizations applicable to the Project by virtue of the legislation in force from the competent national authorities and communities concerned.</p>	<p><i>One month before the start of the civil works</i></p>	<p><i>Project Implementation Unit</i></p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	The Recipient will respect or enforce the conditions set out in these permits and authorizations.	Throughout the project implementation period	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Develop, validate and disclose workforce management procedures – labor management procedures (LMP) - in accordance with national law and ESS2, with consideration for nondiscrimination and equality opportunity. Relevant clauses to be included in the contracts of suppliers/service providers and subcontractors include the prohibition of child and forced labor and guarantee the right to form a union. Project workers will be required to sign codes of conduct which will prohibit issues like Sexual Exploitation and Abuse, Sexual Harassment.</p>	<p><i>The LMP shall be disclosed during negotiations.</i></p> <p><i>To be implemented at the start of project preparation and throughout Project life cycle</i></p>	<i>Project Implementation Unit and Contractors</i>
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>As part of the LMP, establish, operate, and maintain a GM for Project Workers to respond quickly to concerns and employment-related issues through a transparent, easily accessible, inclusive, and participatory process that is easy to understand and which provides for feedback to the parties concerned in a language which they understand. The GM will be reflected in the Contractor Environmental and Social Management Plan (C-ESMP), and with entry points for managing SEA/SH incidents, detailing the procedures, entry points, GBV service referrals and accountability mechanisms for complainants.</p>	<i>Before starting of activities and during the entire life cycle of the Project</i>	<i>Project Implementation Unit and Contractors</i>
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Ensure that the contractors employed under the project implement occupation, health, and safety (OHS) measures specified in the LMP, ESMP/ESMF, as part of their C-ESMP.</p>	<i>Before starting work. These measures are maintained throughout the implementation of the Project.</i>	<i>Project Implementation Unit and Contractors</i>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.1	<p>WASTE MANAGEMENT PLAN: Ensure that the companies or contractors of the Project develop and implement a Waste and Hazardous Materials Management Plan (ordinary waste and specific waste) at all the installation sites of construction site.</p> <p>The Recipient will also:</p> <ul style="list-style-type: none"> ensure suppliers and service providers of the Project develop and implement a Waste and Hazardous Materials Management Plan before the works ensure the strict application of these plans through regular monitoring and supervision. <p>implement waste management measures specified in the ESMP and any other waste management plan prepared as part of the site specific ESMPs.</p>	<p><i>Developed three months after Project effectiveness, prior to works, and thereafter implemented throughout Project implementation.</i></p>	<p>Project Implementation Unit and Contractors</p>
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Ensure that (i) site specific ESMPs will explore technically and financially feasible measures to improve efficient consumption of water and building materials and (ii) the prescriptions and the technical measures are covered by the Contractor ESMPs.</p> <p>Suppliers and providers will be required to comply with pollution management standards and measures. Payment of invoices submitted will be subject to compliance with both technical, environmental, and social recommendations.</p>	<p><i>During the preparation and implementation of site specific ESMPs.</i></p>	<p>Project Implementation Unit and Contractors</p>
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY: Adopt and implement measures to manage risks related to traffic circulation, as required as part of the ESMP to be developed under 1.3 above. These measures must be considered by Contractors in their C-ESMP. The Project will ensure compliance with these measures during the execution of the work by its team made up of an environmental and social specialist.</p>	<p><i>Before the starting of works and during the life cycle of the Project</i></p>	<p>Contractor and Project Implementation Unit</p>

<p>4.2</p>	<p>COMMUNITY HEALTH AND SAFETY:</p> <p>The Recipient shall ensure that Project contractors develop and implement measures and actions as required in the Environmental and Social Impact Assessments (ESIA) to assess and manage specific risks and impacts to the community arising from the implementation of the Project activities, including those relating to the presence of Project Workers and any risks of labor influx. Since the project is not expected to operate in highly insecure environments, a Security Risk Assessment (SRA) and Security Management Plan (SMP) will not be required prior to approval. However, human security threats – whether contextual or related to project activities – and potential mitigating measures will be covered in the ESIA/ESMP.</p> <p>Develop and implement measures against the transmission of COVID-19 to communities due to the influx of labor in accordance with WHO and national requirements and inform communities of these risks and prevention measures.</p> <p>The use of security personnel is not envisioned in the project, but should this aspect change the Recipient shall implement necessary risk mitigation measures before deploying security personnel under the Project (training, codes of conduct, assessments/plans, SEA/SH measures) in line with the ESSs to minimize risks for beneficiaries. In such a case, the ESCP will be amended and redisclosed to reflect requirements and responsibilities related to the use of security personnel under the project</p>	<p><i>Before the starting of works and during the life cycle of the Project</i></p>	<p><i>Contractor and Project Implementation Unit</i></p>
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<p>4.3</p>	<p>GBV AND SEA RISKS:</p> <p>Prepare, adopt, and implement a Sexual Exploitation and Sexual Harassment Action Plan (SEA/SH Action Plan), to assess and manage the risks of sexual exploitation and abuse and sexual harassment (SEA/SH) to be included in the ESMF and updated for the ESIA's including a mapping of services. It will be part of the ESMF, ESIA's, ESMPs and OHS recommendations.</p> <p>Mitigation measures include a number of GBV/SEA/SH prevention and response measures to raise awareness, prevent and mitigate the risks of GBV, including, but not limited to, the development of a code of conduct for workers and the organization of training to raise awareness of GBV risks among Project stakeholders, and a Grievance Mechanism (GM) that is sensitive to SEA/SH complaints with an accountability framework and a response protocol that includes referrals to GBV services. Consultations with women will take place regularly during the life of the project to ensure that the mechanism designed to handle complaints related to SEA/SH is accessible and that the services provided are adapted to the needs of survivors.</p> <p>The PIU will ensure that all tendering documents, works contracts or service contracts under the Project will adopt a code of conduct that will be given for signature to all workers. This Code of Conduct shall apply to contracts or services other than consulting services, ordered or performed under such contracts, shall cover in particular gender-based violence, violence against children and sexual exploitation and abuse, and will include an action plan for their effective implementation, and will include training for this purpose.</p>	<p><i>The SEA/SH plan will be developed in the ESIA and adopted and implement during the entire period of the Project</i></p>	<p><i>PIU and contractors</i></p>
<p>4.4</p>	<p>GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION:</p> <p>Make available additional funding for the implementation of measures to address the risks and impacts of sexual exploitation and abuse that may occur during the implementation of the Project. The SEA/SH risk mitigation measures will be implemented and will be updated as required based on changes in field conditions as part of the project.</p>	<p><i>During the entire life cycle of the Project</i></p>	<p><i>PIU and contractors</i></p>

THE WORLD BANK - ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

5.1	<p>RESETTLEMENT PLANS:</p> <p>Prepare a resettlement policy framework (RPF) to guide the preparation of site-specific Resettlement Action Plans (RAPs), in line with the requirements of NES 5 and national legislation.</p> <p>Prepare and implement, in a participatory manner, any site-specific RAPs, consistent with ESS5 and national law.</p> <p>All RAPs must be approved by the Association and disseminated nationally and on the World Bank's website.</p>	<p><i>The final version of the RPF will be disclosed before negotiations.</i></p> <p><i>RAPs will be prepared and implemented before starting work under the Project..</i></p>	Project Implementation Unit
5.2	<p>GRIEVANCE MECHANISM</p> <p>The project grievance mechanism, developed as part of the SEP under the provisions of ESS10, will consider grievances related to land acquisition and involuntary resettlement.</p>	<p><i>Prior to project negotiation, as part of the project GM, under ESS10</i></p>	Project Implementation Unit
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS:</p> <p>Implement biodiversity management measures, in application of the ESMF directives and site-specific E&S studies. The specific E&S studies will be submitted to the Association for approval before launching the supplier / service provider consultation documents</p>	<p><i>Application of measures throughout the implementation of the sub-project</i></p>	Project Implementation Unit
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
Not relevant			
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS</p> <p>Avoid causing harm or damage to know cultural heritage. Develop and implement a procedure for chance finds of cultural heritage during project implementation in the ESMF/ESMP; and include as Clauses in all works contracts, even in cases where the probability is very low, in accordance with national legislation and the practices of the Ministry of Culture.</p>	<p><i>Throughout Project implementation</i></p>	Project Implementation Unit
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	Not relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Prepare, adopt and implement a Stakeholder Engagement Plan (SEP).</p> <p>The government will recruit an NGO or a specialized office at the local level to support the implementation and monitoring of the SEP.</p>	<p><i>SEP will be disclosed prior to appraisal and updated as required during project implementation</i></p> <p><i>SEP must be updated after the feasibility studies have been completed, and throughout the implementation of the project</i></p>	<p><i>Project Implementation Unit</i></p>
10.2	<p>PROJECT GRIEVANCE MECHANISM:</p> <p>Prepare, establish, implement, and maintain the GM, as described in the SEP. The GM will include a special channel for handling complaints related to issues of sexual exploitation and abuse, sexual harassment, and violence against children.</p> <p>This Grievance Mechanism will be supported by a communication plan to ensure that the affected communities concerned by the project are aware of the existence of this mechanism and know the procedures for submitting and processing complaints as well as other remedies.</p>	<p><i>To be operational not later than one month after effectiveness and maintained throughout the implementation of the Project.</i></p>	<p>Project Implementation Unit</p>
CAPACITY SUPPORT (TRAINING)			
CS1	<p>Training may be required on the following topics:</p> <ul style="list-style-type: none"> • How to conduct a relevant environmental and social baseline of the project area and correlate to mitigation measures/risk identification • How to use consultation to obtain social data • Identification of vulnerable and marginalized groups • Identification and mobilization of stakeholders • Special aspects of environmental and social assessment • Health and security at work • Managing security risks in conflict prone areas • Preparation and response to emergency situations • Risk and disaster management • Grievance Mechanism • Sexual Exploitation and Abuse, Sexual Harassment, and Violence Against the Children 	<p><i>One session 3 months after the start of project activities and 1 additional session 6 months after the start of project activities.</i></p>	<p>Project Implementation Unit and Contractors World Bank</p>

	<p>Occupational Health and Safety Training (under ESS2 and ESS4): Companies must train all Project workers, including security guards, on occupational health and safety, first aid equipment, prevention of emergency situations and how to prepare for and respond to such situations.</p>	<p><i>At the start of the work</i></p>	<p>Project Implementation Unit and Contractors World Bank</p>
	<p>Training on employment and working conditions (ESS2)</p> <ul style="list-style-type: none"> • Terms and conditions of employment in application of national labor legislation; • Codes of conduct for suppliers / service providers and • Subcontractors; • Workers' organizations and grievance mechanism; <p>Regulations on child labor and minimum employment age of children.</p>	<p><i>At the start of the work</i></p>	<p><i>Project Implementation Unit and Contractors</i></p>
	<p>Training on environmental and social management (ESS1), This training will consist of sharing knowledge on:</p> <ul style="list-style-type: none"> • the environmental and social selection and classification process for project sites • the procedures for organizing and carrying out ESIA's and RAPS; • environmental policies, procedures and legislation in the Islamic Republic of Mauritania; • the process of monitoring the implementation of ESMPs 	<p><i>Six months after Project effectiveness</i></p>	<p><i>Project Implementation Unit and Contractors</i></p>
	<p>Training on Grievance Management Mechanism (ESS10), design, and realization of the module by integrating at least the following aspects:</p> <ul style="list-style-type: none"> • Registration and processing procedure; • Complaints settlement procedure; • Documentation and handling of complaints; • Use of the procedure by the various stakeholders. 	<p><i>Throughout project implementation</i></p>	<p><i>Project Implementation Unit and Contractors</i></p>
	<p>GBV risk training</p> <ul style="list-style-type: none"> • Awareness and prevention and mitigation measures of the risks of GBV, as well as the accountability and response framework; • Themes, activities and target audiences will be defined in the GBV Action Plan; • Dissemination of the GBV action plan (activities, target groups.). 	<p><i>Six months after Project effectiveness</i></p>	<p><i>Project Implementation Unit</i></p>

	<p>Training on the construction site ESMP (ESS1)</p> <ul style="list-style-type: none"> • Objectives and structure of the Construction site ESMP; • Main impact management measures proposed in the Site ESMP • Appropriation of the Site ESMP; • Main implementation and performance indicators. 	<p><i>At the start of the work</i></p>	<p><i>Project Implementation Unit and Contractors</i></p>
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