

**The Kingdom of Lesotho**

**Ministry of Education and Training**

**Ministry of Social Development**

**Basic Education Strengthening Project  
(P175065)**

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

**January 2021**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Kingdom of Lesotho, through its Ministry of Education and Training (MoET), and its Ministry of Social Development (MoSD), will implement the Basic Education Strengthening Project (the Project). The International Development Association (hereinafter, the Association) has agreed to provide financing for the Project.
2. The Kingdom of Lesotho, 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 Kingdom of Lesotho, 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 Framework, including Action Plan against preventing Gender-Based Violence, Labor Management Procedures, and Waste Management Plan (collectively, the ESMF), and Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S documents.
4. The Kingdom of Lesotho, 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 Kingdom of Lesotho, 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 Kingdom of Lesotho, 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 Kingdom of Lesotho, 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 Kingdom of Lesotho. The Kingdom of Lesotho, 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, the Kingdom of Lesotho, 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 and gender-based violence.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<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 documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	Six-monthly as part of Project progress reports.	MoET and MoSD
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, students, education establishment staff, local communities, the public or workers. Provide sufficient detail 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.</p>	Notify the Bank within 48 hours after learning of the incident or accident with the submission of any required subsequent report within a timeframe acceptable to the Association, as requested.	MoET and MoSD
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND 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 an E&amp;S Specialist responsible for the day-to-day implementation of the ESMF, GBV Action Plan, and Stakeholder Engagement Plan.</p>	Within 90 days after Project effectiveness. The organizational structure, including the specialists, should be maintained throughout Project implementation	MoET and MoSD
1.2	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b></p> <p>Prepare an Environmental and Social Management Framework (ESMF), which includes GBV Action Plan, Waste Management Plan, and Labor Management Procedures, to identify and assess the environmental and social risks and impacts of the Project and appropriate mitigation measures, in a manner acceptable to the Association.</p>	Before Appraisal	MoET and MoSD
1.3	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>Screen any proposed subproject in accordance with the ESMF prepared for the Project, and, thereafter, prepare and implement the Waste Management Plan (for sub-component 1.3)), as required and if needed, in a manner acceptable to the Bank/Association.</p>	Before Appraisal. To be development as part of the ESMF.	MoET and MoSD

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<b>MANAGEMENT OF CONTRACTORS</b> Not relevant to the Project		
1.5	<b>MANAGEMENT OF COMMUNITY LABOR</b> Not relevant to the project		
1.6	<b>PERMIT, CONSENTS AND AUTHORIZATIONS:</b> Obtain, as appropriate, the permits, consents and authorizations that are applicable to the Project from relevant national authorities, pursuant to applicable national laws.  Comply, or cause the Construction Contractor(s) to comply, as appropriate, with the conditions established in these permits, consents and authorizations throughout Project implementation.  The following permit apply: <b>Basel Permit</b> for the export, import or transit of hazardous waste. <i>Relevant Regulation:</i> Basel Convention. <i>Issuing Authority:</i> Department of Environment(DoE).	Obtain permit prior to carrying out any Project activity requiring a permit.	MoET
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<b>LABOR MANAGEMENT PROCEDURES</b> Develop and implement Labor Management Procedures (LMP) for the Project including project staff, consultants, contractors, contractors workers and community workers.	Before Appraisal. To be implemented throughout project implementation.	MoET and MoSD
2.2	<b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b> Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Before Appraisal. To be implemented throughout project implementation.	MoET and MoSD
2.3	<b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b> Develop and implement occupational, health and safety (OHS) measures, including emergency preparedness and response measures, consistent with the ESMF and World Bank Group Environmental Health and Safety Guidelines, which shall be set out in the LMP.	Before Appraisal. To be implemented throughout project implementation.	MoET and MoSD
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.1	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b> Resource efficiency and pollution prevention and management measures will be covered under the Waste Management Plan to be prepared as part of the ESMF (see action 1.3 above).	Before Appraisal. To be implemented throughout project implementation.	MoET and MoSD
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>TRAFFIC AND ROAD SAFETY:</b> Not relevant to the Project		MoET and MoSD
4.2	<b>COMMUNITY HEALTH AND SAFETY:</b> Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers	To be implemented throughout project implementation.	MoET and MoSD
4.3	<b>GBV AND SEA RISKS:</b> Prepare and implement measures to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA) and include these measures in the ESMF, all proportionate to the risks posed by project activities	To be implemented throughout project implementation.	MoET and MoSD
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
	Not Relevant to the project		
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
	Not Relevant to the project		
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
	Not Relevant to the project		
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<b>Not Relevant to the Project .</b>		
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			

	Not Relevant to the project		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b></p> <p>The Stakeholder Engagement Plan (SEP) is already been prepared and disclosed and will be implemented hereinafter to continue stakeholder engagement and consultation.</p>	To be implemented throughout project implementation.	MoET and MoSD
10.2	<p><b>PROJECT GRIEVANCE MECHANISM:</b> Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP.</p>	GRM established before appraisal and maintained throughout project implementation.	MoET and MoSD
<b>CAPACITY SUPPORT (TRAINING)</b>			
CS1	<p>Training for PIU project staff and consultants:</p> <ul style="list-style-type: none"> <li>ESF Requirements</li> <li>Roles and responsibilities for environmental and social issues</li> <li>Occupational health and safety (including COVID-19 recommendation)</li> <li>Labour requirements</li> <li>Emergency prevention and preparedness and response arrangements to emergency situations</li> <li>Managing GBV/SEA risks</li> <li>Maintaining GRM and keeping GRM log</li> <li>Waste Management</li> </ul>	<p>Training for PIU and project staff within 90 days following project effectiveness.</p> <p>Training for PIU consultants Repeated as necessary throughout project.</p>	MoET and MoSD