



**Republic of Zambia**

**Girls' Education and Women's Empowerment  
and Livelihoods for Human Capital Project  
(P181391) and First Additional Financing  
(P181391)**

**(Updated)**

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

**July 2025**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Zambia (“Recipient”) will implement the Girls’ Education and Women’s Empowerment and Livelihoods for Human Capital Development Project (“the Project”), with the involvement of the Gender Division under the Office of the President (“Gender Division”), Ministry of Education (“MoE”), Ministry of Community Development and Social Services (“MCDSS”), and Ministry of Health (“MoH”), as set out in the Financing Agreement and Grant Agreements (“the Agreements”). The International Development Association (“Association”) has agreed to provide financing for the original financing (P181391) and the first additional financing (P181391) for the Project, as set out in the referred Agreements. This Environmental and Social Commitment Plan (ESCP) supersedes previous versions of the ESCP for the Project and shall apply both to the original financing and the first additional financing, for the Project referred to above.
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 and Grant Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreements.
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. As provided for under the referred Agreements, the Recipient shall ensure that there are sufficient funds available to cover the of implementing the ESCP.
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 Gender Division and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Permanent Secretary of Gender Division. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on “Indicators for Implementation Readiness” below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the “Timeframe” column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT</b>			
A	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Maintain the Project Implementation Unit with qualified staff and resources to support management of environmental, social, health and safety risks and impacts of the Project including environmental and social focal points at the provincial and local levels.</p>	Maintain the PIUs established under GEWEL 2 and maintain the recruited E&S specialists, and assigned E&S Specialists, as applicable, were assigned to the PIUs throughout Project implementation.	MCDSS, MoH, MoE, and Gender Division as the E&S Focal Point
B	<p><b>CAPACITY BUILDING PLAN/MEASURES</b></p> <p>Prepare and implement the following capacity building measures:</p> <p>Training for PIU staff MOE, MOH, MCDSS, and Gender Division staff, stakeholders and communities on stakeholder mapping and engagement, specific aspects of environmental and social assessment, emergency preparedness and response, community health and safety, labor codes of conduct, incident reporting, grievance management and Gender-Based Violence (GBV)/ Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH).</p>	Required capacity building and training commenced within the first year after the Effective Date and will continue throughout Project implementation, with refresher trainings undertaken on a quarterly basis where applicable.	MCDSS, MoH, MoE, and Gender Division as the E&S Focal Point
<b>MONITORING AND REPORTING</b>			
C	<p><b>MONITORING AND REPORTING</b></p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> <li>• Status of preparation and implementation of E&amp;S documents required under the ESCP.</li> <li>• Summary of stakeholder engagement activities carried out as per the Stakeholder Engage Plan.</li> <li>• Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them.</li> <li>• Number and status of resolution of incidents and accidents reported under action E below.</li> </ul>	Submit quarterly reports to the Association throughout Project implementation, commencing 3 months after the Effective Date. Submit each report to the Association no later than 45 days after the end of each reporting period.	Gender Division
D	<p><b>CONTRACTOR'S MONTHLY REPORTS</b></p> <p>Require contractors and supervising firms to provide monthly monitoring reports on E&amp;S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>	Submit the monthly reports to the Association as annexes to the reports to be submitted under action C above.	MoH
E	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Notify the Association of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers,</p>	Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.	MCDSS, Gender Division, MoH, and MoE.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity. resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of SEA, or SH; or disease outbreaks. Provide available details of the incident or accident to the Association upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.</p>	
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <p>1. Adopt and implement an Environmental and Social Management plan (ESMP) for the Project to assess and manage the environmental and social risks and impacts of the project, consistent with the relevant ESSs. Without limitation to the foregoing, include the requirements of the general Environmental Health and Safety Guidelines (EHSGs) on waste management and OHS in the ESMP and Labour Management Procedures.</p> <p>2. Adopt and implement the subproject site-specific ESMPs for WASH rehabilitation activities.</p> <p>3. Adopt and implement updated GBV/SEA/SH action plan.</p>	<p>1. Adopt the already existing ESMP under GEWEL 2 and thereafter implement the ESMP throughout Project implementation.</p> <p>2. Adopt the site specific ESMPs before launching the bidding process for the <b>Water, Sanitation, and Hygiene (WASH)</b> rehabilitation activities and any other Project activity that requires the adoption of such ESMPs. Once adopted, implement the respective ESMPs throughout Project implementation.</p> <p>3. Adopt the GBV/SEA/SH action plan under GEWEL 2 and thereafter implement the action plan throughout Project implementation.</p>	
1.2	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&amp;S instruments, the Labor Management Procedures (LMP), and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.</p>	<p>During the preparation of the procurement documents and before the start of activities by contractors.</p>	MoH

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts. The contracts shall include penalties for noncompliance of ESHS requirements and specifications.	Supervise contractors throughout Project implementation.	
1.3	<b>TECHNICAL ASSISTANCE</b> Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project including the development of the project ESMP are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter, prepare and finalize the outputs of such activities in compliance with the terms of reference.	Throughout Project Implementation	MCDSS, MoH, MoE, and Gender Division as the E&S Focal Point
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<b>LABOR MANAGEMENT PROCEDURES</b> Adopt and implement the 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.	Adopt the LMP under GEWEL 2 and thereafter implement it throughout Project implementation.	MCDSS, MoH, MoE, and Gender Division as the E&S Focal Point
2.2	<b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b> Maintain and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Maintain Grievance Mechanism established under GEWEL 2 throughout Project implementation	MCDSS, MoH, MoE, and Gender Division as the E&S Focal Point
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<b>WASTE MANAGEMENT PLAN</b> Implement a Waste Management Plan (WMP), as part of the ESMP prepared for GEWEL 2, , to manage hazardous and non-hazardous wastes, consistent with ESS3.	Adopt the ESMP under GEWEL 2 and thereafter implement the WMP throughout Project Implementation.	MCDSS, MoH, MoE, and Gender Division as the E&S Focal Point
3.2	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 3.1 above.	Same as 3.1	MCDSS, MoH, MoE, and Gender Division as the E&S Focal Point
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.1	<b>TRAFFIC AND ROAD SAFETY</b> Incorporate measures to manage traffic and road safety risks as required in the ESMP prepared under GEWEL 2 referred to in action 1.2 above.	Same as 3.1	MCDSS, MoH, MoE, and Gender Division as the E&S Focal Point
4.2	<b>COMMUNITY HEALTH AND SAFETY</b> Assess and manage specific risks and impacts to the community arising from Project activities including, inter alia behavior of Project workers, risks of labor influx, response to emergency situations, risk of exposure by the community to dust and noise during minor rehabilitation works and include mitigation measures in the ESMP.	Same as 3.1.	MoH
4.3	<b>SEA AND SH RISKS</b> Adopt and implement a GBV/SEA/SH Action Plan as part of the ESMP, to assess and manage the risks of SEA and SH.	Adopt the GBV/SEA/SH Action Plan under GEWEL 2 and thereafter implement the SEA/SH Action Plan throughout Project implementation.	MCDSS, MoH, MoE, and Gender Division as the E&S Focal Point
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS</b> ESS 6 is not currently relevant.		
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	ESS 7 is not currently relevant		
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<b>CULTURAL HERITAGE RISKS AND IMPACTS</b> ESS 8 is not currently relevant.		
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
9.1	ESS 8 is not currently relevant		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b> Update 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 for GEWEL 2 was disclosed on February 14, 2024 and the updated SEP will be redisclosed prior to conclusion of Project Appraisal and will be implemented throughout the Project implementation.	MCDSS, MoH, MoE, and Gender Division as the E&S Focal Point

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>Publicize, maintain, and operate the accessible grievance mechanism established under GEWEL 2, 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 grievance mechanism 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>	<p>Maintain the existing GBV-responsive grievance mechanism developed under the GEWEL 2 project that will apply to all project locations, except in the two districts for nutrition-specific activities implemented by MoH, in the event that MoH specific grievance mechanism is already present and thereafter maintain and operate the mechanism throughout Project implementation.</p>	<p>MCDSS, MoH, MoE, and Gender Division as the E&amp;S Focal Point</p>
<p><b>INDICATORS FOR IMPLEMENTATION READINESS</b></p> <p>The following actions are indicators for implementation readiness: Update Stakeholder Engagement Plan</p>			