

**Republic of the Marshall Islands  
Pacific Islands Regional Oceanscape Program for  
Economic Recovery and Resilience Project  
P178544**

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

**October 2022**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Republic of Marshall Islands (RMI) (the Borrower) will implement the Pacific Regional Oceanscape Program for Economic Recovery and Resilience Project (RMI PROPER) Project (the Project), with the involvement of the Marshall Islands Marine Resources Authority (**MIMRA**), as set out in the Financing Agreement. The International Development Association (the Association), has agreed to provide financing (P178544) for the Project, as set out in the referred agreement(s).
2. The Borrower 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(s).
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower 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 Borrower, 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 Borrower through MIMRA and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Borrower Director of MIMRA. The Borrower 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 six-monthly project progress reports to the Association throughout Project implementation, commencing after the Effective Date in accordance with the timeframe described in the Financing Agreement. Submit each report to the Association no later than 30 days after the end of each reporting period.</p>	<p>Project Management Unit (PMU) with support from the Centralized Implementation Unit (CIU) Environmental and Social (E&amp;S) Team</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), violence against children (VAC) 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>Provide subsequent report to the Association with corrective measures within a timeframe acceptable to the Association.</p>	<p>PMU with technical and oversight support from the CIU E&amp;S Team</p>
C	<p><b>CONTRACTORS’ MONTHLY REPORTS</b></p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts, and submit such reports to the Association.</p>	<p>Submit monthly reports to the Association upon request and as annexes to the reports to be submitted under action A above.</p>	<p>Project Management Unit (PMU) with support from the CIU E&amp;S Team</p>
D	<p><b>NOTIFICATIONS RELATING TO DAAB COMPLIANCE REVIEW OF CONTRACTOR COMPLIANCE WITH SEA/SH PREVENTION AND RESPONSE OBLIGATIONS</b></p> <p>Notify the Association of any referral submitted to the Dispute Avoidance and Adjudication Board (DAAB) to initiate a process of compliance review in relation to a contractor’s obligations to prevent and respond to SEA, and/or SH specified in the respective works contract with such contractor; and, in the event of any such referral, notify the Association of: (i) the DAAB’s decision on such referral; (ii) the contractor’s Notice of Dissatisfaction, if any, with such DAAB decision; (iii) any notification received</p>	<p>No later than 7 days after the issuance or receipt, as applicable, of the relevant document (i.e., referral to the DAAB, issuance of DAAB decision, Notice of Dissatisfaction, notice of commencement of emergency/full arbitration, emergency/full arbitration order, as applicable).</p>	<p>PMU, with support from the CIU E&amp;S Team</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>on the commencement of an emergency arbitration proceeding or full arbitration proceeding in relation to the DAAB’s decision; and (iv) the resulting emergency arbitration order and/or full arbitration order, if any.</p>		
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>		
<p>1.1 <b>ORGANIZATIONAL STRUCTURE</b></p> <ol style="list-style-type: none"> <li>Maintain CIU staffing arrangement of one full time International Environment Specialist, one full time International Social Specialist, and at least one full time Majuro-based E&amp;S Officer.</li> <li>PMU shall engage an environmental and social project officer to work on project-related environmental and social risk management activities.</li> <li>PMU shall engage environmental and social specialists on an ad hoc basis to prepare environmental and social assessments and construction supervision for physical works.</li> </ol>	<ol style="list-style-type: none"> <li>CIU organizational structure shall be maintained throughout Project implementation.</li> <li>Environmental and social project officer to be engaged within six months of the Project Effective Date.</li> <li>Engagement of specialists during the design and construction phase of physical works.</li> </ol>	<ol style="list-style-type: none"> <li>DIDA and CIU.</li> <li>PMU with technical oversight and mentoring support from the CIU E&amp;S Team.</li> <li>PMU with technical and oversight support from the CIU E&amp;S Team.</li> </ol>
<p>1.2 <b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <ol style="list-style-type: none"> <li>Update, consult, adopt, disclose and thereafter implement the Environmental and Social Management Plan (ESMP) for the Project, consistent with the relevant ESSs.</li> <li>Screen any proposed Project activity in accordance with the ESMP adopted for the Project. The proposed Project activities that are screened as High or Substantial risk as per the process set out in the ESMP shall be ineligible to receive financing under the Project.</li> <li>Ensure all lease agreements are in place before procurement commences, with the duration of the lease agreements covering the period until the closing date of the Financing Agreement. No land will be used (such as for rehabilitation or upgrading) unless suitable leases are in place.</li> </ol>	<ol style="list-style-type: none"> <li>ESMP was prepared, consulted, disclosed and adopted prior to appraisal. Implement the ESMP throughout Project implementation.</li> <li>Screening to be completed prior to the finalization of bidding document.</li> <li>Prior to commencement of procurement.</li> </ol>	<ol style="list-style-type: none"> <li>PMU is responsible for ESMP implementation, with technical support provided by the CIU E&amp;S Team.</li> <li>PMU with technical support provided by CIU E&amp;S Team.</li> <li>PMU with technical support provided by CIU E&amp;S Team.</li> </ol>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.3	<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 (set out in Annex 1 of the LMP), into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Contractors to prepare, adopt and implement a Contractors Environmental and Social Management Plan (CESMP), based on the relevant template provided in the ESMP, detailing the methods to comply with the Project E&amp;S instruments. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p>	<p>Prior to the finalization of procurement documents. CESMPs to be prepared and approved prior to the commencement of works and implemented throughout Project implementation.</p> <p>CESMPs for Moderate-risk Works to be disclosed prior to commencement of civil works.</p>	<p>PMU with technical and oversight support from by CIU E&amp;S and Procurement teams.</p> <p>WB to review and approve CESMPs for Moderate-Risk Works.</p>
1.4	<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, that are consistent with the ESMP, LMP and SEP. Thereafter ensure that the outputs of such activities comply with the terms of reference and are consistent with the ESMP, LMP and SEP.</p>	<p>Throughout Project implementation.</p>	<p>PMU with technical and oversight support from by CIU E&amp;S and Procurement teams.</p>
<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 sexual exploitation and abuse and sexual harassment (SEA/SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	<p>LMP was prepared, consulted, disclosed and adopted prior to appraisal, and will be implemented throughout Project implementation.</p>	<p>CIU E&amp;S Team to prepare and disclose the LMP.</p> <p>PMU to implement LMP with technical support from CIU E&amp;S and Procurement teams.</p>
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	<p>Grievance mechanism operational prior engaging Project workers and maintained throughout Project implementation.</p>	<p>CIU E&amp;S team responsible for establishment of grievance mechanism for Project workers.</p> <p>Implementation by the PMU, with oversight by the CIU E&amp;S team</p>

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> Prepare, adopt, and implement waste management measures in ESMP, including incorporating into Contractor’s bid documents (as specified in the ESMP) the requirement for a Contractor Waste Management Plan. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with Contractor Waste Management Plan.	Preparation of clauses prior to the finalization of procurement documents. Supervision of Contractors throughout Project implementation.	PMU with technical support and oversight by the CIU E&S team
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 1.2 above.	Same timeframe as for the adoption and implementation of the ESMP.	PMU with technical support and oversight by the CIU E&S team
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>TRAFFIC AND ROAD SAFETY</b> Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.2 above.	Same timeframe as for the adoption and implementation of the ESMP.	PMU with technical support and oversight by the CIU E&S team
4.2	<b>COMMUNITY HEALTH AND SAFETY</b> Prepare, adopt, and implement measures and actions included in the ESMP and LMP to manage risks (including code of conduct to address behavior of Project workers), and include these measures in the CESMPs to be prepared in accordance with the Project ESMP, in a manner acceptable to the Association. Assess and manage specific risks and impacts to the community arising from Project activities and include mitigation measures in the CESMPs to be prepared in accordance with the ESMP.	Same timeframe as for the adoption and implementation of the ESMP and LMP.	PMU with technical support and oversight by the CIU E&S team
4.3	<b>SEA AND SH RISKS</b> Prepare, adopt, and implement measures and actions and include in the ESMP and LMP to manage SEA/SH risks (including code of conduct to address behavior of Project workers). Include mitigation measures in CESMPs to be prepared in accordance with the Project ESMP.	Same timeframe as for the adoption and implementation of the ESMP and LMP.	PMU with technical support and oversight by the CIU E&S team
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS</b> Adopt and implement measures and actions to assess and manage biodiversity risks as required in the ESMP prepared for the Project, and consistent with ESS6.	Same timeframe as for the adoption and implementation of the ESMPs.	PMU with technical and oversight support from the CIU E&S Team

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Technical Assistance, feasibility, and other studies will assess potential risks and impacts on biodiversity in the subsequent implementation of measures or actions recommended by the studies.</p> <p>Materials sourced from coral rock and coastal sand mining are not permitted be to used on the Project.</p>	<p>Throughout project implementation.</p> <p>Throughout project implementation.</p>	
<b>ESS 8: CULTURAL HERITAGE</b>			
8.2	<p><b>CHANCE FINDS</b></p> <p>Describe and implement the chance finds procedures as part of the CESMPs in accordance with the Project ESMP.</p>	Same timeframe as for the ESMPs.	PMU with technical and oversight support from the CIU E&S Team.
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b></p> <p>1. Prepare, adopt, and implement the Stakeholder Engagement Plan (SEP) 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 genuine and culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.</p> <p>2. Prepare and implement activity-based Stakeholder Engagement Action Plans (SEAPs) in compliance with the SEP, concurrent with the Annual Workplan.</p>	<p>1. SEP was prepared, disclosed and adopted prior to appraisal. Implement the SEP throughout Project implementation.</p> <p>2. Prepare and implement a Stakeholder Engagement Action Plan (SEAPs) for each activity (as required)</p>	<p>1. CIU responsible for preparing the SEP, in consultation with the PMU.</p> <p>2. PMU responsible for preparation and implementation of SEAPs with technical and oversight support from the CIU E&amp;S Team.</p>
10.2	<p><b>PROJECT GRIEVANCE REDRESS MECHANISM</b></p> <p>Establish, publicize, maintain, and operate an accessible Project grievance redress mechanism (GRM), 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 redress 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>Project GRM prepared, consulted, adopted and disclosed prior to appraisal.</p> <p>Project GRM to be operational within 30 days of the Effectiveness Date and Implemented throughout the Project.</p>	<p>CIU E&amp;S team responsible for establishment of Project GRM.</p> <p>Implementation by the PMU, with oversight by the CIU E&amp;S team</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>CAPACITY SUPPORT</b>			
CS1	PMU staff to receive training on Project E&S instruments and the roles and responsibilities of different key agencies in E&S risk management.	Within 3 months of the Effective Date.	PMU to arrange training and keep records. CIU E&S Team to prepare and deliver training.
CS2	All Project workers to receive training on local culture, occupational health and safety, prevention of gender-based violence (GBV), SEAH, Violence Against Children (VAC), environmental incidents and emergency prevention and preparedness and responses to emergency situations and the grievance mechanisms.	As required, prior to work commencing, and throughout Project implementation as new workers are engaged.	PMU to arrange training and keep records. CIU E&S Team to prepare and deliver training.
CS3	Contractors to receive training on the relevant aspects of the Project E&S instruments and relevant ESHS requirements, including implementation of the CESMP.	Prior to mobilization and throughout the duration of their contract.	PMU to arrange training and keep records. CIU E&S Team to prepare and deliver training.