

Republic of the Marshall Islands

Marshalls Energy Company (MEC)

**Renewable Energy Generation and Access
Increase Project**

**As Phase 1 of the Multi-Phase Programmatic
Approach
Accelerating Sustainable Energy Transition**

P181250

NEGOTIATED

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

30 April 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Marshall Islands (the Recipient) will implement the Renewable Energy Generation and Access Increase Project as Phase 1 of the Multi-Phase Programmatic Approach Accelerating Sustainable Energy Transition (the Project), with the involvement of the Marshalls Energy Company (MEC), as set out in the Financing Agreement and the Project Agreement. The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the referred agreements.
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 the Project Agreement. 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.
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 Marshalls Energy Company and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Chief Executive Officer of Marshalls Energy Company. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
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 E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanisms.	Submit six-monthly project progress reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association not later than 30 days after the end of each reporting period.	Project Implementation Unit (PIU) with support from the Centralized Implementation Unit (CIU) Environmental and Social (E&S) Team.
B	INCIDENTS AND ACCIDENTS 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 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 or accident. Provide detailed report, including corrective measures, to the Association within a timeframe acceptable to the Association.	PIU with technical and oversight support from the CIU E&S Team.
C	CONTRACTORS' MONTHLY REPORTS Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the ESHS metrics specified in the respective bidding documents and contracts and submit such reports to the Association. Monitoring reports should include details of stakeholder engagement undertaken during that period.	Submit the monthly reports to the Association (upon request) within two working days of receiving the monthly report from the Contractor.	PIU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE 1. Maintain CIU E&S staffing arrangement including an International Environment Specialist, an International Social Specialist, and two full-time Majuro-based E&S Officers.	1. The CIU organizational structure shall be maintained throughout Project implementation.	1. DIDA and CIU. 2. PIU, with technical support from CIU E&S Team. 3. PIU with technical and oversight from CIU E&S Team.

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>2. PIU shall engage an E&S Development Officer to conduct E&S screening of proposed works, monitor civil works and ensure compliance with ESMP/CESMPs and support stakeholder engagement in collaboration with the CIU E&S team and consultants/contractors engaged for specific works.</p> <p>3. PIU shall engage E&S specialists on an ad hoc basis to prepare E&S assessments and construction supervision for physical works.</p>	<p>2. Engagement of PIU E&S Development Officer for duration of project works, by no later than 3 months after the Effective Date.</p> <p>3. Engagement of specialists during the design phase of physical works and preparation of studies.</p>	
<p>1.2 ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>1. Update, consult, adopt, disclose, and thereafter implement the Environmental and Social Management Plan (ESMP) for the Project, consistent with the relevant ESSs.</p> <p>2. Screen any proposed Project activity in accordance with the ESMP adopted for the Project and, thereafter, prepare, consult, adopt, disclose, and thereafter implement activity Environmental and Social Assessments (ESA, where required) and/or Environmental and Social Management Plans (ESMP) and/or CESMP and/or Codes of Environmental and Social Practice (COESP) as set out in the ESMP, and prepare Land Use Due Diligence Reports for clearance by the Association.</p>	<p>1. ESMP to be finalized, consulted, disclosed, and adopted by no later than 3 months after the Effective Date. Implement the ESMP throughout Project implementation.</p> <p>2a. Submit the respective Terms of Reference (ToR) for ESA and/or ESMP for the Association's prior review and no objection prior to initiating bidding for E&S consultants or, in the case of the CIU conducting the environmental and social assessment, prior to initiating the assessment.</p> <p>2b. Once ESA/ESMP is completed, submit for Association review and no objection.</p> <p>2c. Once adopted, implement the respective ESA/ESMP throughout Project implementation.</p>	<p>1. PIU is responsible for ESMP implementation, with technical support provided by the CIU E&S Team.</p> <p>2. Screening will be undertaken by the PIU E&S Officer with technical oversight by the CIU E&S Team.</p>
<p>1.3 MANAGEMENT OF CONTRACTORS</p> <p>1. Incorporate the relevant aspects of the ESCP, including the relevant E&S instruments, and the Labor Management Procedures (LMP), including sample Code of Conduct set out in Annex 1 of the LMP, into the ESHS specifications of the procurement documents with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p>	<p>1. Incorporate the relevant aspects prior to the finalization of procurement documents.</p>	<p>PIU with technical and oversight support from by CIU E&S and Procurement teams.</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	2. Require Contractors to prepare, adopt and implement a Contractor Environmental and Social Management Plan (CESMP) or Code of Environmental and Social Practice (COESP), including a labor management plan, detailing the methods to comply with the Project E&S instruments and consistent the ESMP.	2. CESMPs and Codes of Environmental and Social Practice (COESP) to be prepared prior to the commencement of works and implemented throughout Project implementation.	
1.4	TECHNICAL ASSISTANCE Ensure that consultancies, studies (including feasibility studies, if applicable), 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 ESSs, ESMP (including LMP) and SEP. Thereafter ensure that the outputs of such activities comply with the terms of reference and are consistent with the ESMP and SEP, and the ESSs.	Throughout Project implementation.	PIU with technical and oversight support from CIU E&S and Procurement teams.
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Prepare, consult, adopt, disclose, 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 gender based violence (GBV), sexual exploitation, abuse or harassment (SEAH), violence against children, forced labor and child labor), grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.	LMP to be included within the ESMP and to be finalized, consulted, disclosed and adopted not later than 3 months after the Effective Date , and thereafter implement the LMP throughout Project implementation. Primary supply worker sections of the LMP will be reviewed and, if necessary, updated prior to bid documents for physical works.	PIU is responsible for implementation of the LMP, with technical support by the CIU E&S Team.
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain, and operate a grievance mechanism for Project workers in the LMP and consistent with ESS2.	The LMP prepared for the Project contains the Grievance Mechanism for Project workers.	PIU is responsible for implementation of the Worker Grievance Mechanism with oversight by the CIU E&S team.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY MEASURES</p> <p>Adopt, and implement occupational, health and safety (OHS) measures (including personal protective equipment, and emergency preparedness and response) for physical works in Contractor's bid documents as specified in the ESMP.</p> <p>Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the OHS specifications of their respective contracts.</p>	<p>Preparation of clauses prior to the finalization of procurement documents.</p> <p>Supervision of Contractors throughout Project implementation.</p>	PIU, with technical support from the CIU E&S and Procurement Teams.
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Prepare, adopt and implement site specific Waste Management Procedures as part of the CESMPs to be developed under action 1.2 above in accordance with the ESMP and consistent with ESS3, to manage hazardous and non-hazardous wastes.</p>	Same timeframe as for the adoption and implementation of the CESMP.	PIU with technical support and oversight by the CIU E&S team
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures, including aggregate sourcing and management measures, in the CESMPs to be prepared under action 1.2 above, in accordance with the ESMP.</p> <p>Conduct a targeted audit of existing sites that will benefit from works under the project (e.g. elevating pad-mounted transformers, diesel generators), to assess the risk of leakages and resulting ground/water contamination by hazardous substances, and recommend any required remediation measures; and requirements associated with the proper disposal of old Solar Household Systems (SHS) from Arno. Thereafter implement the measures in accordance with the ESMP.</p>	Same timeframe as for the adoption and implementation of the CESMP.	PIU with technical and oversight support from the CIU E&S Team
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMP and associated instruments, to be developed under action 1.2 above and included in the CESMPs. Thereafter implement the measures in accordance with the ESMP.</p>	Same timeframe as for the adoption and implementation of the CESMP.	PIU with technical and oversight support from the CIU E&S team

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Adopt, and implement measures and actions included in the ESMP to assess and manage specific risks and impacts to the community, including:</p> <p>code of conduct to address behavior of Project workers, risks of labor influx, response to emergency situations; and include these measures in the CESMPs to be prepared in accordance with the ESMP, in a manner acceptable to the Association.</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers, SEA/SH, and risks of labor influx, and include mitigation measures in the CESMPs to be prepared in accordance with the ESMP.</p>	Same timeframe as for the adoption and implementation of CESMP.	PIU with technical and oversight support from the CIU E&S team
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>LAND ACCESS PLAN</p> <p>Prepare, adopt and implement a Land Access Plan governing land access for the Project, consistent with ESS5. The Land Access Plans will include guidance on design and siting of works, and confirm lease arrangements and voluntary land access arrangements. Public land will be prioritized and any use of non-Government land will be voluntary and subject to a lease arrangement.</p>	The Land Access Plan will be prepared and disclosed the earlier of: (i) no later than 3 months after the Effective Date; or (ii) prior to the commencement of Project related activities requiring any access to lands.	CIU E&S Team is responsible for preparing the Land Access Plan. PIU is responsible for implementation with technical and oversight support from the CIU E&S Team.
5.2	<p>LAND DUE DILIGENCE REPORT</p> <p>Prepare and implement a land due diligence report for activities under the project for which the Land Access Plan requires such a land due diligence report. Civil works cannot commence until the report has been approved by the Bank.</p>	Land due diligence reports are prepared and completed prior to commencement of civil works.	PIU with technical and oversight support from the CIU E&S Team.
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Prepare, adopt, and implement screening and assessment measures for biodiversity and natural ecological habitat impacts in accordance with the ESMP. Based on findings, prepare, adopt, and implement appropriate mitigation measures to address biodiversity risks as part of the CESMPs and consistent with the ESMP and ESS6.</p>	Same timeframe as for the adoption and implementation of the CESMPs.	PIU with technical and oversight support from the CIU E&S Team.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Materials sourced from coral rock and coastal sand mining are not permitted to be used on the Project.	Throughout Project implementation.	
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Prepare, adopt, and implement measures to screen for impacts on cultural heritage, and prepare, adopt, and implement mitigation measures as part of the CESMPs, all in accordance with the ESMP and consistent with ESS8.	Same timeframe as for the CESMPs.	PIU with technical and oversight support from the CIU E&S Team.
8.2	CHANCE FINDS Describe and implement the chance finds procedures as part of the CESMPs, in accordance with the ESMP. This will also cover the procedures to be followed for any item of unexploded ordnance (UXO) as a precautionary measure. In the unlikely event that UXO is encountered on any worksite associated with the Project, the Recipient will follow the procedures and requirements outlined in: (i) the applicable laws and regulations; and (ii) the ESMP.	Same timeframe as for the CESMPs.	PIU with technical and oversight support from the CIU E&S Team.
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN 1. Prepare, adopt, and implement the 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 genuine and culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. 2. Prepare and implement activity-based Stakeholder Engagement and Communication Action Plans (SECAPs) in compliance with the SEP, concurrent with the Annual Workplan.	Adopt and disclose the SEP not later than 3 months after the Effective Date. Implement the SEP throughout the life of the Project. 2. Prepare and implement SECAPs as required.	CIU responsible for preparing and updating the SEP. PIU responsible for implementing the SEP and preparing 6-monthly SECAPs with oversight support from the CIU E&S Team.
10.2	PROJECT GRIEVANCE REDRESS MECHANISM 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	Project grievance mechanism to be established and operational no later than 3 months after the Effective Date. Implement GRM throughout the life of the Project.	CIU E&S team responsible for establishment of Project grievance mechanism.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The GRM 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 (GBV) service providers, all in a safe, confidential, and survivor-centered manner.</p>		Implementation by the PIU, with oversight by the CIU E&S team.
CAPACITY SUPPORT			
CS1	<p>ASSESS AND ADDRESS E&S TRAINING NEEDS</p> <p>PIU staff to receive training on Project E&S instruments, the relevant requirements of the ESMPs and the roles and responsibilities of different key agencies in E&S risk management.</p>	Not later than 3 months after the Effective Date.	<p>PIU to arrange training and keep records.</p> <p>CIU E&S Team to prepare and deliver training.</p>
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.	<p>PIU to arrange training and keep records.</p> <p>CIU E&S Team to prepare and deliver training.</p>
CS3	Contractors to receive training on the relevant aspects of the Project E&S instruments and relevant ESHS requirements, including preparation and implementation of the CESMP.	Prior to preparation of CESMP, prior to mobilization and throughout the duration of their contract.	<p>PIU to arrange training and keep records.</p> <p>CIU E&S Team to prepare and deliver training.</p>