

**Republic of Djibouti /  
Djibouti Road Agency (ADR)**

**HORN OF AFRICA INITIATIVE:  
DJIBOUTI REGIONAL ECONOMIC  
CORRIDOR PROJECT (P174300)  
AND  
ADDITIONAL FINANCING (P181415)**

**Appraisal Version**

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

**20 June 2024**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Djibouti (The Recipient) is implementing the Horn of Africa Initiative: Djibouti Regional Economic Corridor Project (the Project) with the involvement of the Djibouti Road Agency (ADR) as set out in the Financing Agreement for the original financing (P174300) and in the Financing Agreement for the Additional Financing (P181415). The International Development Association (the Association) has agreed to provide the original financing (P174300) and additional financing (P181415) for the Project, as set out in the referred agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for 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 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.
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 and the Association shall agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the General Manager of the Djibouti Road Agency (ADR). The Recipient 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, functioning of the grievance mechanism(s), capacity building activities, contractors ES performances, and incidents.</p>	<p>Submit quarterly ES reports to the Association throughout Project implementation, commencing after the Effective Date of the AF Project. Submit each report to the Association no later than 15 days after the end of each reporting period.</p>	<p>Project Implementation Unit (PIU) of ADR<sup>1</sup></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), and accidents that result in death, serious or multiple injury, road and traffic accidents, communicable diseases, acts of violence/protest, child labor, forced labor displacement without due process, environmental pollution. 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 24 hours for serious cases such as fatalities or SEA/SH or 48 hours for all other instances after learning of the incident or accident.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association.</p>	<p>PIU</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 the monthly reports to the Association upon request.</p>	<p>PIU Contractors</p>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			

<sup>1</sup> In French, UGP, Unité de Gestion de projet de l'ADR.

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>1.1 <b>ORGANIZATIONAL STRUCTURE</b></p> <p>Maintain an ES Unit within the entity implementing the project that is tasked with ESHS management, with qualified staff and resources to support management of ESHS risks and impacts of the Project including one head E&amp;S risk specialist for the PIU, one E&amp;S consultant, one health and safety specialist, one social specialist (focusing on grievance management, E&amp;S reporting, and responsible for activities under component 3c).</p>	<p>Maintain these positions currently in the ES Unit throughout Project implementation.</p>	<p>ADR</p>
<p>1.2 <b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <p>1. Implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for the parent project consistent with the relevant ESSs.</p> <p>2. Update, disclose and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for the for the 33km section of RN1 to be financed by the AF, consistent with the relevant ESSs. The Terms of Reference for the ESIA/ESMP shall be submitted to the Association for no objection prior to proceeding to prepare the ESIA/ESMP.</p>	<p>1. The parent project ESIA and ESMP was approved and disclosed on 15 October 2021, and thereafter shall be implemented throughout Project implementation.</p> <p>2. Adopt and disclose the cleared AF ESIA and ESMP prior to launching the bidding process for the activities under the AF project, and thereafter implement the ESIA and ESMP throughout Project implementation.</p>	<p>PIU</p>
<p>1.3 <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, and code of conduct, into the ESHS specifications of the procurement documents and contracts 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>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise contractors throughout Project implementation.</p>	<p>PIU</p>
<p>1.4 <b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the 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. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	<p>Throughout Project implementation.</p>	<p>PIU</p>

1.5	<p><b>CONTINGENT EMERGENCY RESPONSE FINANCING</b></p> <p>a) Ensure that the CERC Manual as specified the legal agreement includes a description of the ESHS assessment and management arrangements for the implementation of CERC component, in accordance with the ESSs.</p> <p>b) Adopt any environmental and social (E&amp;S) instruments which may be required for activities under CERC component, of the Project, in accordance with the CERC Manual and the ESSs, and thereafter implement the measures and actions required under said E&amp;S instruments, within the timeframes specified in said E&amp;S instruments.</p>	<p>a) The adoption of the CERC manual in form and substance acceptable to the Association is a withdrawal condition under Section [XX] of Schedule 2 of the [name of legal agreement] for the Project.</p> <p>b) Adopt any required E&amp;S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&amp;S instrument is required. Implement the E&amp;S instruments in accordance with their terms, throughout Project implementation.</p>	ADR or the designated authority for a CERC component.
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**ESS 2: LABOR AND WORKING CONDITIONS**

2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>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 SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	<p>The project LMP was approved and disclosed on November 8, 2021. Update the LMP within two months after Effective Date of the Financing Agreement for the Additional Financing. The LMP currently in place shall continue to be implemented while the update is completed. All measures specified in the updated LMP to be implemented throughout Project implementation.</p>	PIU
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	<p>Maintain grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.</p> <p>Require each contractor to also establish its own grievance mechanism for workers.</p>	PIU

**ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT**

3.1	<b>WASTE MANAGEMENT PLAN</b> 1. Incorporate, adopt and implement a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes, consistent with ESS3 in the ESMPs under action 1.2 above.	1. Same timeframe as for the adoption and implementation of the ESMP for the parent and AF Projects.	PIU
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	2. Require contractors to include a WMP in C-ESMPs prior to the notice to proceed for the start of civil works.	2. Before the notice to proceed for the start of civil works.	
3.2	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> 3. Incorporate resource efficiency and pollution prevention and management measures in the ESMPs under action 1.2 above.  4. Require contractors to put in place measures for the rational use of resources and the prevention and management of pollution within the C-ESMP.	1. Same timeframe as for the adoption and implementation of the ESMP for the Project.  2. Before the notice to proceed for the start of civil works	PIU

ESS 4: COMMUNITY HEALTH AND SAFETY			
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.	The Road Safety Management Plan was approved and disclosed on 08 November 2021. It shall be updated within two months after Project Effective Date of the Financing Agreement for the Additional Financing, and prior to the start of any works financed by the AF and shall thereafter be implemented throughout Project implementation.	PIU
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, and include mitigation measures in all ESMPs to be prepared.	Same timeframe as for the adoption and implementation of the ESMPs of the ESMP for the Project.	PIU
4.3	<b>SEA AND SH RISKS</b> Adopt and implement a SEA/SH Prevention and Response Action Plan to assess and manage the risks of SEA and SH.	Update the project SEA/SH Prevention and Response Action Plan within two month of Project Effective Date of the Financing Agreement for the Additional Financing and thereafter implement the updated SEA/SH Action Plan throughout	PIU

		Project implementation.	
4.4	<p><b>SECURITY MANAGEMENT</b></p> <p>Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, as set out in the ESMP, guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.</p>	Prior to engaging security personnel and thereafter implemented throughout Project implementation.	PIU

**ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT**

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
5.1	<p><b>RESETTLEMENT FRAMEWORK</b></p> <p>Adopt and implement a Resettlement Policy Framework (RF) for the Project, consistent with ESS5.</p>	The RF was disclosed on 24 October 2021. The RF shall be updated within two months of Project Effective Date of the Financing Agreement for the Additional Financing, and thereafter implement the updated RF throughout Project implementation.	
5.2	<p><b>RESETTLEMENT PLANS</b></p> <p>Update, disclose, and implement a Resettlement Plan for each activity under the Project for which the RF requires a RP that is in line with the RF and consistent with ESS5. The Terms of Reference for the development of RPs are subject to the Associations' no objection.</p>	<p>The RP for the Project was adopted and disclosed on 24 June 2023 and shall be updated within 2 months of the Effective Date of the AF and prior to the starts of any works under the AF and thereafter implemented prior to the start of works.</p> <p>Adopt and implement the respective RPs, including ensuring that before taking possession of the land and related assets, full compensation has been provided and as applicable displaced people have been resettled and moving allowances have been provided.</p>	PIU

5.3	<b>GRIEVANCE MECHANISM</b> Implement, and maintain a grievance management mechanism to address resettlement related complaints as described in the RPs and SEP.	Implement the GM throughout the Project implementation.	PIU
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS</b>  Require the contractor to adopt the C-ESMP to include measures related to plant species adapted to the bioclimatic zone in accordance with the guidelines of the ESIA/ESMPs prepared for the Project, and consistent with ESS6.  Adopt the C-ESMP prior the notice to proceed for the start of civil works and thereafter implement the C- ESMPs throughout Project implementation.	Measures be included in the ESMPs and implement these measures throughout Project implementation.  Prior the notice to proceed for the start of civil works and thereafter implement the C-ESMPs throughout Project implementation.	PIU
<b>ESS 8: CULTURAL HERITAGE</b>			
<b>MATERIAL MEASURES AND ACTIONS</b>		<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
8.1	<b>CHANCE FINDS</b> Implement the chance finds procedures, as part of the ESMPs of the Project.  Cause the contractor to include and adopt chance finds procedures as part of the Contractor-ESMP (C-ESMP) prior to the notice to proceed for the start of civil works.	Include the chance find procedures in the ESMPs. Implement the procedures throughout Project implementation.  Adopt the C-ESMP that includes chance finds procedures prior the notice to proceed for the start of civil works. Implement the procedures throughout contacts implementation.	PIU
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b> Update and implement the Project 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 culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	The project SEP was disclosed on 05 September 2021. The updated draft of the SEP was disclosed prior to Appraisal. The SEP shall be updated and disclosed two months after Effective Date of the Financing Agreement for the Additional Financing, and prior to the start of any works financed by the AF and thereafter	PIU



		implement the SEP throughout Project implementation.	
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>Publicize, maintain, and operate an accessible grievance mechanism, 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>	Maintain and operate the existing grievance mechanism, inclusive of a GM process to handle incidents related to SEA/SH throughout Project implementation.	PIU
<b>CAPACITY SUPPORT</b>			
CS1	<p>Provide the following training to: PIU staff, stakeholders, communities, Project workers:</p> <ul style="list-style-type: none"> <li>Stakeholder mapping and inclusive, participatory and accessible consultation</li> <li>Social inclusion: Identifying and addressing needs to vulnerable and disadvantaged individuals and groups in the project including in risk mitigation, consultation, GM, project benefits</li> </ul>	Quarterly starting after Effective Date of the Project.	PIU

<b>MATERIAL MEASURES AND ACTIONS</b>	<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITY</b>
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	<ul style="list-style-type: none"> <li>• Environmental and social assessment and conducting meaningful social and environmental baselines</li> <li>• Emergency preparedness and response</li> <li>• Community health and safety.</li> <li>• Civil works monitoring</li> <li>• GEMs</li> <li>• ES reporting</li> <li>• Grievance management and monitoring operationality of the GM</li> <li>• Addressing SEA/SH risks and implementation, monitoring and reporting of the Action Plan</li> <li>• Managing and mitigating labor risks and monitoring and reporting the LMP; Codes of Conduct</li> <li>• Community Health and Safety</li> <li>• Implementing and monitoring RAPs, physical and/or economic displacement</li> <li>•</li> </ul>		
CS2	<p>Provide following training to Project workers:</p> <ul style="list-style-type: none"> <li>• Occupational health and safety</li> <li>• Emergency prevention and preparedness</li> <li>• Response arrangements to emergency situations.</li> <li>• Grievance mechanism</li> <li>• Code of conducts and related prohibitions and sanctions</li> <li>• First Aid</li> <li>• Defensive driving and road safety</li> <li>• Community Health and Safety</li> <li>• SEA/SH risk mitigation and awareness</li> </ul>	Quarterly starting after Effective Date	PIU