

Republic of Iraq



**Ministry of Construction, Housing, Municipalities &
Public Works (MoCHMPW)**

**Road Maintenance Microenterprises Grant Project
ROADS AND BRIDGES DIRECTORATE (RBD)**

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

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September , 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Iraq will implement the Road Maintenance Microenterprises Grant project, with the involvement of the Ministry of Construction and Housing and Municipalities and Public Works (MoCHMPW) through the a) Roads and Bridges Directorate (RBD) in Baghdad, and (b) General Directorate for Roads and Bridges in GDRB in Erbil (hereinafter the recipient of the Grant). The International Bank for Reconstruction and Development (hereinafter the **Bank**) has agreed to provide financing for the Project.
2. Subject to further confirmation of the Grant request, Republic of Iraq, through MoCHMPW will implement material measures and actions so that the Project is implemented in accordance with the World Bank's Environmental and Social Standards (**ESSs**) under the World Bank's Environmental and Social Framework (ESF). This Environmental and Social Commitment Plan (**ESCP**) sets out a summary of the material measures and actions.
3. Where the ESCP refers to specific plans or other documents, whether they have already been prepared or are to be developed, the ESCP requires compliance with all provisions of such plans or other documents. In particular, the ESCP requires compliance with the provisions set out in the environmental impact assessments, Stakeholder Engagement Plan, Labor Management Procedures, any other documents that will be identified and developed for the Project.
4. The table below summarizes the material measures and actions that are required, as well as the timing of the material measures and actions. The (MoCHMPW) through the a) Roads and Bridges Directorate (RBD) in Baghdad, and (b) General Directorate for Roads and Bridges in GDRB in Erbil is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the project implementation units under MoCHMPW.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by (MoCHMPW) through a) Roads and Bridges Directorate (RBD) in Baghdad, and (b) General Directorate for Roads and Bridges in GDRB in Erbil as required by the ESCP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Bank and the (MoCHMPW) through the a) Roads and Bridges Directorate (RBD) in Baghdad, and (b) General Directorate for Roads and Bridges in GDRB in Erbil, 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, (MoCHMPW) through a) Roads and Bridges Directorate (RBD) in Baghdad, and (b) General Directorate for Roads and Bridges in GDRB in Erbil will agree to the changes with the Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through an exchange of letters signed by the Bank and the (MOCHPW) through the a) Roads and Bridges Directorate (RBD) in Baghdad, and (b) General Directorate for Roads and Bridges in GDRB in Erbil . The (MoCHMPW) through a) Roads and Bridges Directorate (RBD) in Baghdad, and (b) General Directorate for Roads and Bridges in GDRB in Erbil will disclose the updated ESCP promptly. Depending on the project, the ESCP may also specify the funding necessary for completion of a measure or action.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the (MoCHMPW) through the a) Roads and Bridges

Directorate (RBD) in Baghdad, and (b) General Directorate for Roads and Bridges in GDRB in Erbil shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESCP MONITORING AND REPORTING			
A	<p>REGULAR REPORTING: Prepare and submit to the Bank regular monitoring reports regarding the implementation of the material measures and actions to mitigate potential environmental and social risks and impacts. The monitoring reports should include the environmental, social, health and safety (ESHS) performance of the Project, the implementation of the ESCP, the status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>	Quarterly progress reports throughout Project implementation	This is the responsibility of the environment and social staff of the project in the MoCHMPW/RBD/ GDRB, which will include a social and an environmental specialist as well as the Third-Party monitoring Agent (TPMA) reports.
B	<p>INCIDENTS AND ACCIDENTS: The Project Management Teams (PMTs) of Roads and Bridges Directorate (RBD) in Baghdad, and (General Directorate for Roads and Bridges in GDRB in Erbil will promptly provide notification to the Bank 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 social and economic aspects, as well as indirect environmental and social aspects, in addition to associated occupational health and safety incidents and accidents.</p> <p>The PMTs will provide sufficient details regarding the incident or accident, indicating immediate measures taken to address the issue. It will include information provided by any contractor and supervising entity, as appropriate. As per the bank request, prepare an incident/ accident report and propose any measures to prevent its recurrence.</p>	<p>Notify the Bank within 24- hours after learning about the occurrence of the incident.</p> <p>A detailed incident/accident report would be provided within a timeframe acceptable to the Bank, as requested</p>	MOCHMPW/RBD/ GDRB + THE CONTRACTOR/microenterprises

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>In contracts for works using the Bank’s standard procurement documents, contractors are required to provide E&S monthly monitoring reports to the Project Implementing Unit. PMTs will submit contractors’ E&S monthly reports to the Bank upon request.</p>	Upon request from the PMT and within 24hr in the case of incidental or unexpected situations	MOCHMPW/RBD/ GDRB + the contractor/microenterprises
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE:</p> <p>Maintain an organizational structure within each PMT with qualified staff and resources to support the management of E&S risks, including at least one environmental, social, health and safety (ESHS) specialist will be hired at each PMT level and ESHS focal point for each governorate in the relevant directorate, and one ESHS as supervisor per microenterprise</p>	30 days after Project effectiveness and shall be maintained throughout Project implementation.	MOCHMPW/RBD/ GDRB
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT:</p> <p>Implement the cleared Environmental and Social Management Framework (ESMF) for the Project</p>	Adopt throughout the project implementation.	MOCHMPW – in each PMT, Project Manager at PMT with support from ESHS specialists
1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>Prepare, adopt and implement site-specific environmental and social instruments based on the ESMF, including ESMPs, proportionate to the environmental and social risks and impacts and according to the Bank’s ESF and national laws..</p>	E&S provisions will be added in bidding and procurement documents. The ESMP will be prepared before commencement of any civil works or procurement activities.	MOCHMPW – in each PMT, Project Manager at PMT with support from ESHS specialists.
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, and the Labour Management Procedures, into the ESHS specifications of the procurement documents. Thereafter ensure that the contractors comply with the ESHS requirements of their respective contracts.</p>	As part of all bidding process, the Project will include provision for E&S risk management in bidding documents and the Contractor will produce an ESMP-C Supervise contractors throughout Project implementation.	MOCHMPW/RBD/ GDRB
1.5	<p>Clearance of UXO/ERW: Clearance will be ensured prior to project activities (with documented evidence such as clearance certificate).</p>	Prior to issuing bidding and preparation of procurement documents, commencement of any civil works	MOCHMPW/RBD/ GDRB in coordination with authorized security force in the region

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES:</p> <p>Adopt, implement and update the Labor Management Procedures (LMP), that have been developed for the Project.</p>	LMP to be implemented throughout Project implementation	MOCHMPW/RBD/ GDRB
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS:</p> <p>Establish, maintain, and operate a grievance mechanism within the ministry and project sites, as described in the LMP and consistent with ESS2.</p>	Grievance redress mechanism to be operational prior to engaging Project workers; and maintained throughout project implementation.	MOCHMPW/RBD/ GDRB / the contractor/microenterprises
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES:</p> <p>Prepare, adopt, and implement occupational, health and safety (OHS) measures as specified in the ESMF and ESMPs to be prepared under action 1.3 above.</p>	OHS Plans to be integral part of the ESMPs throughout Project implementation	MOCHMPW/RBD/ GDRB / the contractor/microenterprises
2.4	<p>EMERGENCY PREPAREDNESS AND RESPONSE:</p> <p>Prepare Emergency Preparedness and Response Plan During the project different phases (rehabilitation and operation). Ensure workers and contractors are trained and implement the plan in coordination with measures under 4.4 where relevant.</p>	Prior to initiating maintenance /rehabilitation works and maintained throughout project implementation	Contractors under the supervision of MOCHMPW/RBD/ GDRB
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS:</p> <p>As part of the ESMPs specified in 1.3, develop, adopt and implement measures and procedures for pollution prevention and the management of waste and hazardous materials related to the</p>	After project effectiveness and before commencement of any civil works. Implementation to be continuous during rehabilitation work and throughout Project implementation	Contractors under the supervision of MOCHMPW/RBD/ GDRB

	<p>maintenance work. All waste streams that will be generated on spot should be identified and monitored.</p>		
<p>ESS 4: COMMUNITY HEALTH AND SAFETY</p>			
4.1	<p>TRAFFIC AND ROAD SAFETY:</p> <p>In consultation with host communities, develop, adopt and implement road safety management measures as required in the ESMF and ESMPs to be developed under 1.2 and 1.3 above.</p>	<p>After project effectiveness and before commencement of any civil works. Implementation to be continuous during rehabilitation work phase and Project implementation</p>	<p>Contractors under the supervision of MOCHMPW/RBD/ GDRB</p>
4.2	<p>COMMUNITY HEALTH AND SAFETY:</p> <p>a. Adopt and implement noise mitigation measures to mitigate disturbance of local communities as required in the ESMF and ESMP checklists to be developed under 1.2 and 1.3 above. The measures will require limited after-hours and weekend traffic and other activities, emitting noise and vibrations that could affect communities.</p> <p>b. Develop, adopt and implement measures and actions to assess and manage specific risks and impacts on the community as required in the ESMF and ESMPs to be developed under 1.2 and 1.3 above arising from Project activities, in relation to Project workers and any risks of labor influx.</p>	<p>After project effectiveness and before issuing bidding documents and contract award. Maintained throughout rehabilitation work phase and Project implementation</p>	<p>MOCHMPW/RBD/ GDRB & the contractor/microenterprises</p>
4.3	<p>GBV AND SEA/SH RISKS DURING PROJECT IMPLEMENTATION:</p> <p>Contractors will need to maintain labour relations with local communities through a Code of Conduct (COC). The COC commits all persons engaged by the contractor, including sub-contractors and suppliers, to acceptable standards of behaviour. The COC must include sanctions for non-compliance, including non-compliance with specific policies related to gender-based violence, sexual exploitation and sexual harassment (e.g., termination). The COC should be written in plain Arabic, Kurdish language and signed by each worker. The results of the</p>	<p>After project effectiveness and before issuing bidding documents and contract award. Maintained throughout the rehabilitation work and Project implementation</p> <p>After project effectiveness and before the preparation of the procurement</p>	<p>MOCHMPW/RBD/ GDRB & the contractor/microenterprises</p>

	GBV screening tool indicated that various aspects of the program bring the GBV risk to a “Low” risk rating and as such the implementing agency will need to prepare a GBV Action Plan in line with the World Bank’s Good Practice Note (GPN) and follow the recommended actions for a low GBV risk rating in the GPN to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA).	documents submit the GBV Action Plan for the Bank’s approval. Once approved, the GBV Action Plan is implemented throughout Project implementation.	
4.4	EMERGENCY RESPONSE MEASURES: As required in the ESMF and ESMPs specified in 1.2 and 1.3, develop, adopt and implement site-specific measures to address emergency events during the construction and operation phases in coordination with measures under 2.4 where relevant.	Developed prior to the commencement of the site work Implemented throughout the rehabilitation work phase and project implementation	MOCHMPW/RBD/ GDRB & the contractor/microenterprises
4.6	AWARENESS RAISING FOR THE COMMUNITY: Where possible, conduct awareness raising campaigns for the community designed to heighten awareness of risks and to mitigate impacts, including a GRM procedure made available for them.	Throughout project implementation	MOCHMPW/RBD/ GDRB & the contractor/microenterprises

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

5	(Not relevant at this stage.)	N/A	N/A
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ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES

6.1	BIODIVERSITY RISKS AND IMPACTS: As part of the ESMF/ESMPs specified in 1.2 and 1.3, develop, adopt and implement screening procedures to mitigate biodiversity risks and impacts resulting from the proposed works.	Prior to project effectiveness. Maintained throughout the project implementation.	MOCHMPW/RBD/ GDRB & the contractor/microenterprises
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ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES

7.1	INDIGENOUS PEOPLES PLAN: (Not relevant at this stage.)	N/A	N/A
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ESS 8: CULTURAL HERITAGE

8.1	CHANCE FINDS: Develop, adopt and implement the chance find procedures as part of the ESMF and ESMPs specified in 1.2 and 1.3	Chance find procedures to be developed as part of the ESMPs under 1.3 above. Implementation of procedures throughout the Project	MOCHMPW/RBD/ GDRB & contractors (in collaboration with the Ministry of Culture & Antiques)
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ESS9: Financial Intermediaries

9	(Not relevant at this stage.)	N/A	N/A
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ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

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10.1	<p>SEP IMPLEMENTATION: Monitor and assess the implementation of the SEP including the grievance mechanism, information dissemination and consultations regarding emergency preparedness and response, and training of project workers and communities. Update SEP as necessary. Any proposed updates will be communicated with the Bank and approved prior to implementation of the activity.</p>	<p>SEP operational prior to project effectiveness and maintained throughout project implementation</p> <p>Submit quarterly progress reports on stakeholder engagement activities</p>	MOCHMPW/RBD/ GDRB & the contractor/microenterprises
10.2	<p>PROJECT GRIEVANCE MECHANISM: Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP.</p> <p>Ensure that confidential mechanisms are in place</p> <p>Monitor and assess the operation of the Grievance Mechanism</p>	<p>Adopt, maintain and operate the GRM system prior to project effectiveness. Ensure the GRM is disseminated in project locations prior to the commencement of any civil works. As applicable, this should include anonymous/confidential channels. Submit quarterly progress reports on complaints and grievances received, types of complaints, number of resolved grievances, and time it took to resolve them.</p>	MOCHMPW/RBD/ GDRB & the contractor/microenterprises
CAPACITY SUPPORT (TRAINING)			

C.1	<p>Training of the PMT + contractor staff on:</p> <ol style="list-style-type: none"> 1. Latest WBG Environmental and Social updates. 2. Training on Occupational Safety and Health Administration (OSHA) regulations. 3. PROJECT WORKERS TRAINING: Implement training of Project Workers designed to heighten awareness of OHS risks as well as community and health safety risks including Covid-19 to mitigate impacts on local communities. 4. GBV and SEA/ SH code of conduct training 	Throughout of the project implementation	<p>MOCHMPW/RBD/ GDRB & the contractor/microenterprises</p> <p>(POINT #3 by the contractor/microenterprises)</p>
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