**Catholic Relief Services - United States Conference of Catholic Bishops**

**Sudan Enhancing Community Resilience Project (P181490) – Second Additional Financing (AF2)**

**ENVIRONMENTAL and SOCIAL**

**COMMITMENT PLAN (ESCP)**

**Negotiated**

**15 April 2025**

**ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. Catholic Relief Services - United States Conference of Catholic Bishops (CRS) (the Recipient) will implement the Second Additional Financing for the Sudan Enhancing Community Resilience Project (the “Project”), as set out in the CRS Financing Agreement and the CRS Grant Agreement (together, the “Legal Agreements”). The International Development Association (the Association) in its own name and acting as an administrator of the Sudan Transition and Recovery Support Multi-Donor Trust Fund 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 Legal 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, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Legal Agreements, the Recipient shall ensure that there are sufficient funds available to cover the costs 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 Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Country Director of the Recipient. 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** |
| --- | --- | --- |
| **Implementation Arrangements and Capacity Support** |
| **A** | **ORGANIZATIONAL STRUCTURE**1. Establish and maintain a Project Implementation Unit (PIU) with qualified staff and resources to support the management of environmental, social, health and safety (E&S) risks and impacts of the Project including an Environmental Specialist and a Social Development Specialist, one SEA/SH Specialist, and one Security Specialist.
 | Establish a PIU and hire or appoint one Environmental and one Social Development Specialist (both familiar with the ESF), one GBV/SEA/SH Specialist, and one Security Risk Management Specialist no later than 60 days after Effective Date and thereafter maintain the PIU and these positions throughout Project implementation. | CRS |
| **B** | **CAPACITY BUILDING PLAN/MEASURES**1. Prepare and implement the training listed under section 6 of the ESMF, including:
* training for senior CRS country staff, PIU staff, stakeholders, communities, Project workers on stakeholder mapping and engagement, specific aspects of environmental and social assessment, SEA/SH prevention and response, Grievance Redress Mechanism (GRM), management of waste and security risk management.
* Training for Project workers: Occupational Health and Safety (OHS), Labor Management Procedures (LMP), Code of Conduct (CoC), SEA/SH prevention and response, GRM mechanism, management of waste, and security risk management.
 | Conduct training during Project start up.  | CRS |
| **MONITORING AND REPORTING** |
| **C** | **REGULAR REPORTING** 1. Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include:
* Status of preparation and implementation of E&S documents required under the ESCP.
* Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan.
* Complaints submitted to the grievance mechanisms, the grievance logs, and progress made in resolving them
* E&S performance of contractors and subcontractors as reported through monthly contractors’ and supervision firms’ reports.
* Number and status of resolution of incidents and accidents reported under action E below.
* CRS to cooperate with BSMA and provide information for the purposes of BSMA’s monitoring of E&S implementation.
 | Submit quarterly and annual reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than 30 days after the end of each reporting period.  | CRS |
| **D** | **CONTRACTORS’ MONTHLY REPORTS**1. Require contractors and supervising firms to provide regular 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 upon request.
 | Submit the monthly reports to the Association upon request | CRS  |
| **E** | **INCIDENTS AND ACCIDENTS** 1. 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, 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; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request
2. 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.
 | Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request. Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice if details are immediately known. If significant investigative work or additional time is required to determine the facts of the situation and identify contributing causes, the project will consult the Bank on the appropriate timeframe and subsequent steps, unless a different timeframe is agreed to in writing by the Association. The initial notification and subsequent report on SEA/SH incidents shall be shared with the Association’s corporate Grievance Redress service (GRS) within the above-referred timeframes*.* | CRS |
| **ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS** |
| **1.1** | **ENVIRONMENTAL AND SOCIAL INSTRUMENTS** 1. Prepare and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs. Include, as part of the ESMF, the following:
2. Description of a screening process to identify subproject activities’ potential E&S risks and determine relevant risk assessments and mitigation plans (e.g., Environmental and Social Management Plans (ESMPs))
3. Labor Management Procedures (LMP)
4. Social Assessment and Social Development Plan (SA/SDP)
5. SEA/SH Action Plan SEA/SH Action Plan
6. Integrated Pest Management Guideline (IPMG)
7. Chance Find Procedures
8. Prepare and implement a Security Risk Assessment and Management Plan (SRA/SMP).
9. Prepare and implement corresponding Environmental and Social Management Plans (ESMPs), consistent with the relevant ESSs and as stipulated in the ESMF.
 | 1. Prepare the Environmental and Social Management Framework including all its relevant instruments prior to disbursement under Categories 1, 2 and 3 as described in the Legal Agreements, and thereafter implement the documents throughout Project implementation.
2. Prepare and disclose the SRA/SMP prior to disbursement under Categories 1,2 and 3 as described in the Legal Agreements and thereafter implement throughout Project implementation.
3. Prepare the ESMPs and incorporate the ESMPs as part of the respective bidding documents for the respective subproject/activity that requires the preparation such ESMP. Once finalized, implement the respective ESMP throughout sub-project implementation.
 | CRS |
| **1.2** | **MANAGEMENT OF CONTRACTORS**1. Incorporate the relevant aspects of the ESCP, including, inter alia, the LMP, and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors. Thereafter ensure that the contractors comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractor to the Association.
 | As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Association upon request. | CRS |
| **1.3** | **TECHNICAL ASSISTANCE** Carry out the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project 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. | CRS |
| **ESS 2: LABOR AND WORKING CONDITIONS**  |
| **2.1** | **LABOR MANAGEMENT PROCEDURES**1. Prepare and implement the Labor Management Procedures (LMP) for the Project as part of the ESMF.
 | Same timeframe as per 1.1 for the preparation and implementation of the ESMF.  | CRS |
| **2.**2 | **GRIEVANCE MECHANISM FOR PROJECT WORKERS** 1. Establish and operate a workers’ Grievance Redress Mechanism, as described in the LMP and consistent with ESS2.
 | Establish and operationalize a grievance mechanism for workers prior to commencement of works, and thereafter maintain and operate throughout Project implementation  | CRS |
| **ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT**  |
| **3.1** | **WASTE MANAGEMENT, RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT**Incorporate waste management, resource efficiency and pollution prevention and management measures in the ESMPs to be prepared under action 1.1 above and ensure that contractors/subgrantees comply with such measures. | Same timeframe as per 1.1 for the preparation and implementation of the ESMPs.  | CRS  |
| **ESS 4: COMMUNITY HEALTH AND SAFETY**  |
| **4.1** | **TRAFFIC AND ROAD SAFETY**1. Incorporate measures to manage traffic and road safety risks as required in the ESMPs to be prepared under action 1.1 above and ensure that contractors/subgrantees comply with such measures.
 | Same timeframe as per 1.1 for the preparation and implementation of the ESMPs.  | CRS  |
| **4.2** | **COMMUNITY HEALTH AND SAFETY**1. Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, risks emanating from behavior of Project workers, risks of labor influx, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.
 | Same timeframe as per 1.1 for the preparation and implementation of the ESMPs. | CRS |
| **4.3** | **SEXUAL EXPLOITATION AND ABUSE (SEA)/SEXUAL HARRASSMENT (SH) RISKS**1. Prepare and implement a SEA/SH Action Plan to assess, prevent and manage the risks of SEA and SH; and prepare site-specific SEA/SH Prevention and Response Plans as part of the site-specific ESMPs
 | Prepare SEA/SH Action Plan under the timeframe as per 1.1 and thereafter implement throughout Project implementation. |  |
| **4.4** | **SECURITY MANAGEMENT** 1. 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 Security Management Plan (SMP), and prepare site-specific SMPs as part of the site-specific ESMPs.
 | Same timeframe as per (ii) under 1.1 for the preparation of the SMP and thereafter implement throughout Project implementation  | CRS |
| **ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT**  |
| **5.1** | 1. ESS5 is considered not relevant. The ESMF shall include principles and procedures for subproject screening. Based on the screening result, those subproject activities that involve resettlement and livelihood impacts will eliminate land acquisition and resettlement related risks. The ESMF will include requirements to evaluate and document 1) land ownership by sub-project participants where relevant; 2) Voluntary Land Donation (VLD) protocol if VLD is permitted; 3) willing buyer-willing seller verification protocol if such mode of acquisition is allowed; 4) the respective documentation requirements for any subproject requiring land and exclusion of sub-projects requiring land acquisition or land use change, physical or economic displacement. These criteria should take into account the current situation regarding community lands and any lack of clarity regarding land ownership and control.
 | Throughout Project implementation. | CRS |
| **ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES**  |
| **6.1** | 1. ESS6 is considered not relevant. The ESMF shall include principles and procedures for subproject screening. Based on the screening result, those subproject activities that would cause impacts relevant to ESS6 shall be excluded and shall not be financed under the Project
 | Throughout Project implementation. | CRS |
| **ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES**  |
| **7.1** | **SOCIAL ASSESSMENT**1. Prepare a Social Assessment (SA) including a Social Development Plan (SA/SDP) as part of the ESMF and site-specific SA/SDPs as part of the site-specific ESMPs and set principles for the Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities consultation.
 | Same timeframe as per 1.1 for the preparation and implementation of the ESMF. | CRS |
| **ESS 8: CULTURAL HERITAGE**  |
| **8.1** | **CHANCE** **FINDS**1. Subprojects likely to be implemented within, or in the vicinity of, a known cultural heritage site, as well as subprojects with potential impacts on cultural heritage shall be excluded from Project financing as per the ESMF screening procedure.
2. Describe and implement the Chance Finds Procedures, as part of the ESMF of the Project.
 | Same timeframe as per 1.1 for the preparation and implementation of the ESMF. | CRS |
| **ESS 9: FINANCIAL INTERMEDIARIES** |
|  | ESS9 is not relevant. |
| **ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE** |
| **10.1** | **STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION**1. 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 was disclosed on 26 March 2025. The SEP will be updated (as needed) and implemented throughout Project implementation.  | CRS |
| **10.2** | **PROJECT GRIEVANCE MECHANISM** 1. Establish, publicize and operate an accessible grievance redress 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 including the indigenous people and vulnerable groups, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The grievance mechanism shall be equipped, and updated as needed, 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. | Functional GM as described in the SEP, as per 10.1, shall be established prior to disbursement under Categories 1, 2 and 3 as described in the Legal Agreements; and maintained and operationalized throughout Project implementation | CRS |
| **INDICATORS FOR IMPLEMENTATION READINESS** |
|  | The following actions are indicators for implementation readiness:1. Establishment of E&S risk management unit in the Project Implementation Entities
2. Recruitment and training of E&S staff within Project Implementation Entities

1. E&S disbursement conditions2. ES assessments and plans to be prepared by the Recipient as per time frame in 1.1  |