



Community and Family Services International (CFSI)

Mindanao Trust Fund Reconstruction and Development Project, Phase III Project ID: P174480

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

20 October 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

1. Community and Family Services International (CFSI) is responsible for the effective and efficient implementation of the Mindanao Trust Fund - Reconstruction and Development Project, Phase III (hereinafter, RDP/3). The International Bank for Reconstruction and Development (hereinafter, the Bank) is providing financing for the RDP/3.
2. CFSI will ensure the RDP/3 is implemented in accordance with the Environmental and Social Standards (ESSs) of the Bank. This Environmental and Social Commitment Plan (ESCP) sets out material measures and actions, any specific documents and plans, as well as the timing for each of these.
3. CFSI will also comply with the provisions of any other Environment and Social (E&S) documents required under the Environment and Social Framework (ESF) of the Bank and referred to in this ESCP, such as Environmental and Social Management Framework (ESMF), Stakeholders Engagement Plan (SEP), Indigenous Peoples Plans (IPPs), and Labor Management Procedures (LMP), as well as the timeframes specified in those documents. The draft ESMF, SEP and LMP will initially be disclosed on 20 October 2020, simultaneous with the disclosure of this ESCP. The ESMF, SEP and LMP will be further revised and redisclosed before project effectiveness.
4. CFSI, as Trust Fund Recipient (TFR), is responsible for compliance with all requirements of the ESCP, largely through its Project Management Unit (PMU), even when implementation of specific measures and actions at field level is carried out by its partner, the Bangsamoro Development Agency (BDA), in its capacity as Project Implementing Unit (PIU).
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by CFSI as required by the ESCP and the conditions of the legal agreement. The Bank will monitor and assess progress as well as the completion of the material measures and actions throughout implementation of the RDP/3.
6. As agreed by the Bank and CFSI, this ESCP may be revised from time to time during RDP/3 implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to the assessment of Project performance conducted under the ESCP itself. In such circumstances, CFSI 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 the exchange of letters signed by the Bank and CFSI. CFSI will promptly disclose the updated ESCP.
7. Where RDP/3 changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, CFSI shall provide additional funds from the RDP/3, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>CFSI will prepare and submit to the Bank regular monitoring reports on the environmental, social, health, and safety (ESHS) performance of the RDP/3, including but not limited to the implementation of the ESCP; status of preparation and implementation of E&S documents required under the ESCP; stakeholder engagement activities; and implementation of the grievance redress mechanism(s).</p>	<p>Quarterly Progress Reports</p>	<p>Official Submission to the Bank: CFSI Executive Director</p> <p>Preparation: CFSI is responsible for preparation with input from BDA</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>CFSI will notify the Bank within 24 hours of any incident or accident related to the RDP/3 which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public, or workers. For example, threats of violence, outbreaks of infectious disease, accidents that could result in death or serious injury, cases of gender-based violence and/or violence against minors, vehicular accidents, etc. The following immediate measures will be observed:</p> <ul style="list-style-type: none"> - A list of emergency numbers of regional and local health officers as well as health facilities will be posted at specific locations and shared with project workers and community volunteers in order to enable access to primary support when there is incident or accident; - Incidents of illnesses among project workers will also be reported, especially those showing signs and known symptoms of COVID-19 and/or other infectious diseases (dengue, measles, tuberculosis, etc.); and - CFSI, with the cooperation of BDA, will provide the Bank with sufficient details regarding the incident or accident as well as the immediate measures taken to address the incident or accident. 	<p>Incident/Accident report, including mitigation measures adopted, will be submitted to the Bank within 24 hours upon learning of any incident/accident.</p> <p>Subsequent reports will be provided as agreed with the Bank.</p>	<p>Official Submission to the Bank: CFSI Executive Director</p> <p>Preparation: CFSI is responsible for preparation with input from BDA</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>CFSI will require Third Party Service Providers (TPSP), such as Construction Contractors, to submit progress monitoring reports emphasizing actions taken to ensure compliance with the Environmental and Social Standards (ESS) provisions and the sub-project specific Environmental and Social Management Plan (ESMP), specifically highlighting the COVID-19 context and related protocols. Issues, challenges, concerns, and actions taken related to ESS compliance will also be reported. This requirement will be stipulated in all Terms of Reference (ToRs) for bidding and contracts with the selected TPSP.</p>	Monthly, from the date of contract signing.	<p>Official Submission to the Bank: CFSI Executive Director or duly designated representative</p> <p>Preparation and Monitoring: CFSI is responsible for preparation with input from BDA</p> <p>Implementation: TPSP Safeguards Focal Point</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE:</p> <p>CFSI will maintain a project organizational structure, patterned after the RDP/2 structure, with qualified staff and resources to support management, monitoring, and reporting of Environmental and Social (E&S) risks – accidents, incidents, and violations.</p> <p>A Safeguards Team will be established to monitor and ensure compliance with ESS provisions.</p>	RDP/3 organizational structure essentially follows the RDP/2 arrangement and will be in place, as well as staffed, after the signing of the Grant Agreement. The organizational structure will include reference to the Safeguards Team that will be maintained throughout project implementation, unless developments require modification.	CFSI will ensure the establishment of a Safeguards Team, with inputs and participation from BDA and site-level partners, such as the Joint Task Forces on Camps Transformation (JTFCCT), Peoples Organizations (POs), community members, and others.
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT:</p> <p>CFSI will update, adopt, and implement the Environmental and Social Impact Assessment (ESIA) using the Environmental and Social Safeguards Checklist (ESSC) that will be enhanced for the RDP/3 in a manner acceptable to the Bank. The site-specific ESIA's will be updated for each proposed sub-project in accordance with the guidelines provided in the Environmental and Social Management Framework (ESMF).</p> <p>CFSI, in collaboration with BDA, will process the results of the ESIA, with the POs as sub-project proponent, to guide the latter in selecting the sub-project that they will propose. The community will then prepare the corresponding Environmental and Social Management Plan (ESMP) to mitigate the negative impacts of the sub-project.</p>	<p>Site-specific Environmental and Social Impact Assessments (ESIA) will be carried out and Environmental and Social Management Plans (ESMPs) will be prepared during the sub-project proposal preparation stage (November-December 2020).</p> <p>ESMPs will be regularly monitored throughout project implementation, i.e., pre-construction; during construction; and after construction.</p>	<p>Preparation and Monitoring: CFSI is responsible for preparation with input from BDA, taking into account the views of the Monitoring and Evaluation Team, Engineering Team, and the designated Safeguards Officers</p> <p>Implementation: TPSP (specifically, Contractors)</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS:</p> <p>CFSI will screen all proposed sub-projects in accordance with the enhanced ESMF prepared for RDP/3, and, thereafter, draft, adopt, and implement a sub-project ESMP, as required, in a manner acceptable to the Bank.</p>	<p>The RDP/2 ESMF will be enhanced to suit the current conditions for RDP/3.</p> <p>The draft ESMF for RDP/3 will initially be disclosed on 20 October 2020. The ESMF will be further revised and finalized and then redisclosed before effectiveness.</p> <p>ESMPs will be developed for each sub-project and will be in effect throughout project implementation. (November-December 2020)</p>	<p>Preparation and Monitoring:</p> <p>Implementation: TPSP (specifically, Contractors)</p>
1.4	<p>MANAGEMENT OF CONTRACTORS:</p> <p>CFSI will incorporate the relevant aspects of the ESCP, including the relevant E&S documents and plans, and the Labor Management Procedures, into the Environmental, Social, Health and Safety (ESHS) specifications of the procurement documents with TPSP (Contractors).</p> <p>Certain provisions of the ESMP related to ESHS will also be explicitly stated in the work contracts, such as provisions that avoid child labor and forced labor, and provisions that must be adopted to mitigate the spread of COVID-19. This will thereafter ensure that the TPSP (Contractors) complies with the ESHS. The first draft of the revised Work Contract will be coordinated with the Bank for a No Objection Letter (NOL).</p>	<p>Prior to the preparation of procurement documents and contract signing. (November-December 2020)</p> <p>ESHS is in effect throughout project implementation. (November 2020-March 2021)</p>	<p>Preparation and Monitoring: CFSI is responsible for preparation with input from BDA, including but not limited to the Monitoring and Evaluation Team, Engineering Team, and the designated Safeguards Officer</p> <p>Implementation: TPSP (specifically, Contractors)</p>

ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES:</p> <p>CFSI will adopt and implement Labor Management Procedures (LMP) that have been developed for the RDP/3 in accordance with ESS2. Provisions include the following:</p> <ul style="list-style-type: none"> - CFSI Personnel Policies Manual - CFSI Policy on Feedback, Complaints and Whistleblowing - CFSI Policy on Child Protection - CFSI Policy on Prevention of Sexual Exploitation and Abuse - Core Humanitarian Principles - Basic Stress Management for Difficult Assignments - UN Security Awareness - Grievance Redress Mechanism <p>Project workers will be oriented on the LMP upon joining the project team.</p>	<p>LMP Orientations:</p> <p>CFSI/BDA Teams: During Project Team On-boarding Activity (October-November 2020)</p> <p>JTFCT: During Project On-boarding Activity (October-November 2020)</p> <p>Contractors: During Contractor's Orientation (after Contract Signing)</p> <p>Project Workers and Community Workers: (During Pre-Implementation Meeting)</p> <p>LMP will be in effect throughout RDP/3.</p>	<p>CFSI is responsible for preparation with input from BDA</p>
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS:</p> <p>CFSI will continue to operate, as well as enhance, its feedback and grievance redress mechanisms for Project workers, as described in the LMP and consistent with ESS2.</p>	<p>The CFSI Feedback Mechanism and the MTF-RDP Grievance Redress Mechanism (GRS) are already operational and will be maintained, as well as enhanced, throughout the implementation of the RDP/3. (October 2020-March 2021)</p>	<p>CFSI is responsible for preparation with input from BDA</p>
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY MEASURES:</p> <p>CFSI will immediately and regularly enhance its current ESMF and ESMP templates to include measures specific to occupational, health and safety (OHS), specially on COVID-19 protocols.</p> <p>Measures will be implemented in accordance with Philippine labor laws and related labor issuances, CFSI policies on environmental and social safeguards, and ESS3.</p>	<p>Enhanced ESMF and site-specific ESMPs with OSH measures will be implemented throughout the project period. (October 2020-March 2021)</p>	<p>CFSI is responsible for preparation with input from BDA</p>

ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>E-WASTE MANAGEMENT PLAN:</p> <p>CFSI will require TPSP (Contractors) to prepare, adopt, and implement an Ecological Waste Management Plan (EWMP) for their respective sub-project(s). The EWMP will be included as part of the bidding documents.</p> <p>The enhanced ESMF will provide the guidelines and requirements for preparing the site-specific and sub-project specific EWMP.</p>	<p>EWMP to be included as part of bid submission. (November-December 2020)</p> <p>EWMP implementation will be throughout sub-project implementation.</p>	<p>Preparation and Monitoring: CFSI is responsible for preparation with input from BDA, including but not limited to the Monitoring and Evaluation Team, Engineering Team, and the designated Safeguards Officers</p> <p>Implementation: TPSP (specifically, Contractors)</p>
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</p> <p>Resource efficiency and pollution prevention and management measures will be covered under the ESMP to be prepared under action 1.3 above.</p>	<p>ESMP Preparation: (November-December 2020)</p> <p>ESMP Implementation will be throughout the sub-project implementation.</p>	<p>Preparation and Monitoring: CFSI is responsible for preparation with input from BDA, including but not limited to the Monitoring and Evaluation Team, Engineering Team, and the designated Safeguards Officers</p> <p>Implementation: TPSP (specifically, Contractors)</p>
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY:</p> <p>CFSI will adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs to be developed under action 1.3 above.</p>	<p>ESMP Preparation: (October-November 2020)</p> <p>ESMP Implementation will be throughout sub-project implementation.</p>	<p>Preparation and Monitoring: CFSI is responsible for preparation with input from BDA</p> <p>Implementation: TPSP (specifically, Contractors)</p>

4.2	<p>COMMUNITY HEALTH AND SAFETY:</p> <p>CFSI will prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from project activities and include these measures in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Bank.</p>	<p>ESMP Preparation: (October –December 2020)</p> <p>ESMP Implementation will be throughout sub-project implementation.</p>	<p>Preparation and Monitoring: CFSI is responsible for preparation with input from BDA</p> <p>Implementation: TPSP (specifically, Contractors)</p>
4.3	<p>GBV AND SEA RISKS:</p> <p>The ESA and ESMF identifies gender-based violence (GBV) and Sexual Exploitation and Abuse (SEA) risks and corresponding measures to prevent and respond to GBV and SEA risks, as well as violations of the rights of children. Specific measures will be identified when screening and assessing proposed sub-projects and activities in accordance with the ESMF.</p> <p>All TPSPs will be oriented and will be required to adopt and observe CFSI Policy on Prevention of Sexual Exploitation and Abuse (PSEA), and CFSI Policy on Child Protection as part of their contracts.</p>	<p>CFSI and BDA Project staff: during staff on-boarding activities (October-November 2020)</p> <p>JTFCT/Community/POs and other partners: during project orientation (October-November 2020)</p> <p>TPSP: After contract signing (during a project orientation activity for contractors)</p> <p>GBV, SEA, and Child Protection risk mitigating measures will be observed throughout the implementation of RDP/3.</p>	<p>CFSI – Office of the Executive Director CFSI is responsible for preparation with input from BDA</p>
4.4	<p>GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION:</p> <p>CFSI will implement measures to address GBV, SEA, and Child Protection risks and impacts that may arise during Project implementation.</p> <p>CFSI will also utilize the referral pathway developed by the Joint Regional Child Protection and Gender-Based Violence Working Group (JRCPGBVWG), currently chaired by the BARMM Ministry of Social Services and Development (MSSD), with CFSI as Secretariat.</p>	<p>Measures to address GBV, SEA, and Child Protection issues will be in effect throughout the project implementation (October 2020-March 2021)</p>	<p>CFSI –Office of the Executive Director CFSI is responsible for preparation with input from BDA</p>

4.5	<p>SECURITY PERSONNEL:</p> <p>One of the lessons learned by CFSI in implementing projects in the six previously acknowledged camps of the MILF, as well as the broader conflict-affected areas of Mindanao is that security is best managed through proper and timely coordination with local stakeholders and by following the coordination protocols set by the parties of the GPH-MILF peace process. For the implementation of the RDP/3, CFSI will continue managing security risks through regular coordination with the camp JTFCTs, MILF and government counterparts, UN agencies, Civil Society Organizations, and community members who understand the local dynamics in the area. CFSI will revisit its staff security policy, orient project workers, and monitor compliance.</p> <p>CFSI does not usually engage either private or Government security actors. In the event that Bank Staff require private security personnel for field missions, CFSI will work with the Bank to formulate a site-specific and context-specific Security Personnel Management Plan.</p>	<p>The Staff Security protocol of CFSI is informed by that of the UN System, but guided by trusted counterparts in the conflict-affected area of Mindanao, including communities. Generally speaking, there is no need for a Security Personnel Management Plan involving private security or the security services of Government. Should the need arises, CFSI will prepare and submit a Plan for the Bank's approval. (October 2020-March 2021)</p>	<p>CFSI is responsible for preparation with input from BDA</p>
<p>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT [The relevance of ESS5 is established during the ESA process. If during Project preparation, it is determined that resettlement documents need to be prepared, this should be reflected in the ESCP. See examples below]</p>			
5.1	<p>RESETTLEMENT PLANS:</p> <p>CFSI will prepare, adopt, and implement a Land Acquisition Framework (LAF) as part of the enhanced ESMF. The LAF will include guidelines and procedures for screening and determining site-specific land acquisition requirements, if any for each sub-project, as well as the procedures and requirements for voluntary land donation (VLD) that are consistent with ESS5. At present, VLD is the most likely approach.</p>	<p>Resettlement Action Plans (RAP) will not be necessary since there will be no sub-project that will involve resettlement as this is on the RDP/3 Negative List. (November 2020-March 2021)</p>	<p>CFSI is responsible for preparation with input from BDA</p>
5.2	<p>GRIEVANCE MECHANISM:</p> <p>CFSI will build on, and where necessary enhance, the existing Grievance Redress Mechanism for complaints concerning land acquisition.</p>	<p>GRM will be in effect throughout project implementation (November 2020-March 2021)</p>	<p>CFSI is responsible for preparation with input from BDA</p>

ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS:</p> <p>CFSI will not implement sub-projects located in critically protected areas and/or sub-projects that use pesticides or herbicides that are prohibited by the government. These will be on the RDP/3 Negative List. The ESSC tool of the ESMF will screen sub-projects based on the possible impact on the biodiversity of the select sites.</p>	<p>There is no need for a Biodiversity Management Plan since sub-projects will not be carried out in protected areas.</p> <p>ESSC preparation and screening during Project Preparation Stage (October-December 2020)</p>	<p>CFSI, with input from BDA, will ensure compliance.</p>
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	<p>INDIGENOUS PEOPLES PLAN:</p> <p>Funds have been allocated in the RDP/3 for sub-projects for Indigenous Peoples (IPs) that will be identified through the decision-making processes of the IPs.</p> <p>CFSI will update Indigenous Peoples Participation Plans as part of the enhanced ESMF. The revisions will include, but not be limited to, a more detailed description of the decision-making process for IP sub-projects, translation of key project documents into relevant IP languages, and strategies to address barriers that make it difficult for IPs to fully participate in community activities.</p>	<p>IP involvement throughout project implementation. (October 2020-March 2021)</p>	<p>CFSI is responsible for preparation with input from BDA</p>
7.2	<p>GRIEVANCE REDRESS MECHANISM:</p> <p>CFSI will prepare, adopt, and implement arrangements for the Grievance Redress Mechanism (GRM) for Indigenous Peoples and further describe such arrangements in the respective IP Participation Plans (if the GRM is distinct from the one established under ESS10).</p> <p>The GRM will include provision for using indigenous systems and procedures, thereby better ensuring cultural relevance, acceptance, and community ownership.</p>	<p>MTF-RDP GRM, as well as the local/Indigenous GRM, will be in effect throughout project implementation. (October 2020-March 2021)</p>	<p>CFSI is responsible for preparation with input from BDA</p>

ESS 8: CULTURAL HERITAGE [The relevance of ESS6 is established during the ESA process. As with other ESSs, ESS6 may require the adoption of specific measures that may be set out in an E&S document (e.g. ESMP) already mentioned in the section under ESS1 above or as a stand-alone document or a separate action. Indicate whether ESS8-related measures are covered under an existing document or as stand-alone actions. See <u>examples</u> below].			
8.1	CHANCE FINDS: CFSI will immediately report and coordinate with the Bangsamoro Commission for the Preservation of Cultural Heritage, for “chance finds” during project implementation. CFSI will also include in its enhanced ESMF, policies and procedures for “chance finds.”	“Chance finds” provision in the ESMF will be in effect throughout Project implementation. (November 2020-March 2021)	CFSI is responsible for reporting and coordinating with input from BDA
ESS 9: FINANCIAL INTERMEDIARIES – NOT APPLICABLE FOR RDP/3			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION: CFSI will prepare, adopt, and implement Stakeholder Engagement Plan (SEP) for RDP/3.	The draft SEP will initially be disclosed on 20 October 2020. The SEP will be further revised and finalized and then redisclosed before effectiveness. The SEP will be implemented throughout the project implementation period. (October 2020-March 2021)	CFSI is responsible for preparation with input from BDA
10.2	PROJECT GRIEVANCE REDRESS MECHANISM: CFSI will prepare, adopt, maintain and operate a Grievance Redress Mechanism (GRM), as described in the SEP, that builds on the GRM applied throughout RDP/2.	MTF-RDP GRS will be in effect throughout project implementation. (October 2020-March 2021)	CFSI is responsible for preparation with input from BDA

CAPACITY SUPPORT (TRAINING)

<p>CSI</p>	<p>Trainings to be provided to CFSI, BDA, and other project workers (JTFCT, POs/Community, Third Party Service Providers), will include but not be limited to the following:</p> <ul style="list-style-type: none"> • Environmental and Social Management Framework (ESMF) • RDP/3 Stakeholder Engagement Plan (SEP) • RDP/3 Labor Management Procedures (LMP) <p>For Project Team:</p> <ul style="list-style-type: none"> • Baseline data gathering and Mapping approaches • ESSC and ESMP Preparation • Documentation of project activities/grievances/lessons learned • Emergency preparedness and response • UN Security Awareness 	<p>CFSI-BDA Project Team during Project Team On-boarding Activity (October-November 2020)</p> <p>JTFCT: During Project On-boarding (October-November 2020)</p> <p>TPSP: Contractor’s Orientation (after Contract Signing)</p> <p>Project Workers and Community Workers: During Pre-Implementation Meeting</p> <p>The draft LMP will initially be disclosed on 20 October 2020. The LMP will be further revised and finalized and then redisclosed before effectiveness.</p>	<p>CFSI is responsible for preparation with input from BDA</p>
------------	--	---	--