



Kingdom of Tonga

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Ministry of Internal Affairs

**Tonga Pathways to Employment and Resilience
Project P181000**

Draft

**ENVIRONMENTAL AND SOCIAL COMMITMENT
PLAN**

12 July 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Kingdom of Tonga (the Recipient) will implement the Tonga Pathways to Employment and Resilience Project (the Project), with the involvement of the Ministry of Internal Affairs Tonga (MIA) and the Ministry of Finance (MoF) as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the referred agreement.
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. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
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 Ministry of Internal Affairs and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient. Chief Executive Officer for Ministry of Internal Affairs. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</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&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanisms.</p>	<p>Submit six-monthly 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.</p>	<p>Project Management Unit (PMU) with support from the Central Services Unit (CSU) Environmental & Social (E&S) Team.</p>
B	<p>INCIDENTS AND ACCIDENTS</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. 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 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association.</p>	<p>PMU with technical and oversight support from the CSU E&S Team.</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p>		<p>PMU with technical support from the CSU E&S team</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>1. Establish and maintain a PMU at MIA as (IA) in accordance with the Financing Agreement. The PMU shall be led by the Project Manager reporting to the IA and will be staffed with qualified staff and resources to support management of ESHS risks and impacts of the Project including an E&S Officer at PMU/ CSU.</p> <p>2. Recruit PMU E&S Officer, with terms of reference, qualifications, and experience satisfactory to the Association, and who have the necessary skill to manage the E&S risks and impacts associated with the Project.</p> <p>3. Maintain CSU E&S staffing arrangement including a full-time locally-based E&S Specialist and a full-time locally-based E&S Officer with terms of reference, qualifications, and experience satisfactory to the Association, and who have the necessary skill to provide capacity building on E&S risk management and provide implementation support to manage the E&S risks and impacts associated with the Tonga WB Portfolio.</p>	<p>1. PMU structure shall be established in accordance with the Financing Agreement and maintained throughout Project Implementation.</p> <p>2. Engagement of PMU E&S Officer for the duration of the project works, by no later than 3 months after the Effective Date of the Financing Agreement for the Project.</p> <p>3. CSU E&S staffing arrangement to be maintained throughout Project Implementation.</p>	<p>1. MIA</p> <p>2. PMU with technical support from the CSU E&S team</p> <p>3. MoF</p>
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>Include the following in the Project Operation Manual (POM):</p> <ul style="list-style-type: none"> - A checklist to guide the storage, management and disposal of e-waste; - Clear eligibility/social inclusion criteria for participation in project activities; - Due diligence and environmental and social requirements for civil society and businesses participating in work placements activities; - Privacy and data protection requirements in relation to the consolidation of social protection beneficiary databases; - Environmental and social eligibility criteria and requirements for the entrepreneurial grant scheme for small business; - environmental and social procedures for the CERC. 	<p>POM to be prepared and submitted for Association review and No Objection within 3 months of Effective Date. Once adopted, implement the POM throughout Project implementation.</p>	<p>PMU with technical oversight from the CSU E&S team</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with consultants and contracted workers. hereafter ensure that the consultants and contracted workers comply and staff and students on work placements to comply with the ESHS specifications of their respective contracts and standard agreements.</p>	As part of the preparation of procurement documents and respective contracts and implemented throughout the Project implementation.	PMU with technical and oversight support from the CSU E&S team and Procurement teams
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies, 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>	Throughout Project implementation.	PMU with technical and oversight support from the CSU E&S team
1.5	<p>CONTINGENT EMERGENCY RESPONSE COMPONENT</p> <p>1. Ensure that the CERC Operational Manual includes a description of the ESHS assessment and management arrangements for the implementation of CERC, Component 4, in accordance with the ESSs.</p> <p>2. Prepare and adopt a CERC-E&S Procedures for the project, in accordance with the ESSs.</p> <p>3. Prepare, disclose and adopt any environmental and social (E&S) instruments which may be required for activities under CERC, Component 4 of the Project, in accordance with the CERC Manual and CERC-E&S Procedures to be prepared in accordance with the ESSs, and thereafter</p>	<p>1. The adoption of the CERC Manual, CERC E&S Procedures in form and substance acceptable to the Association is a withdrawal condition under Financing Agreement for the Project.</p> <p>2. CERC E&S procedures to be prepared as part of the POM and will be submitted for Association review and No Objection within 1 month of Effective Date</p> <p>4. The E&S instruments which may be required for activities under Component 4 (CERC) of the Project shall be prepared, disclosed, consulted, and thereafter adopted before the carrying out of the relevant Project activities under (CERC) of the</p>	MOF

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.	<p>Project. The E&S instruments shall be implemented in accordance with their terms, throughout the carrying out of the CERC activities.</p> <p>Adopt any required E&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&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation.</p>	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>ESS2 applies to all project workers under P2ER. Tongan public service legislation and regulations apply to PMU staff and national consultants directly contracted by the PMU including the Public Service Act 2002 and the Tonga Public Service Policy Manual 2020.</p>	LMP to be finalized no later than 3 months after the Effective Date. Thereafter implement the LMP through Project implementation.	PMU is responsible for the implementation of the LMP, with technical support by the CSU E&S team

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Prepare and implement Labor Management Procedures (LMP) for the Project for contracted workers and which responsibilities and requirements in relation to apprenticeship recipients. The LMP includes provisions, including, inter alia, on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), measures to manage risks of sexual exploitation and abuse and sexual harassment (including through behavioral standards or code of conduct, and access to the project GRM which includes referral pathways for SEA/SH related grievances), forced labor, child labor, grievance arrangements for project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p> <p>Ensure that employment agreements created between the apprenticeship provider and the apprenticeship recipient, and contracts between the IA and the provider, include these provisions to ensure compliance with E&S requirements in line with ESS2 including details on roles and responsibilities of each party.</p>		
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Establish a Grievance Mechanism to be adopted and operational within three months of the Project Effective Date. Maintain throughout Project Implementation.	PMU is responsible for the implementation of the Worker Grievance Mechanism, with technical oversight by the CSU E&S team
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Adopt and implement the waste management measures specified in the POM. For electronic/electric waste (ICT equipment), end of life waste management should be considered at the time of procurement and documented using the waste management checklist in the POM.</p>	Adopt and implement measures in the POM no later than 3 months of Effective Date, and thereafter implement throughout Project implementation at the time of procurement of ICT equipment.	PMU with technical support and oversight from the CSU E&S team
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess, manage and monitor community health and safety risks associated with project activities and address any risks as they arise.</p>	Throughout Project Implementation.	PMU with technical support and oversight from the CSU E&S team
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, in a manner acceptable to the Association, 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.</p>	SEP to be finalized no later than 3 months after the Effective Date. Thereafter implement the SEP through Project implementation	PMU with technical support and oversight from the CSU E&S team
10.2	<p>PROJECT GRIEVANCE MECHANISM</p>	Establish a Grievance Mechanism to be established and operational not later than 3 months after Effective Date. Maintain throughout Project Implementation.	PMU with technical support and oversight from the CSU E&S team

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Establish, 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>		
CAPACITY SUPPORT			
CS1	<p>CAPACITY BUILDING PLAN</p> <p>PMU staff to receive training on project E&S instruments, the roles and responsibilities of different key agencies in E&S risk management.</p>	No later than 3 months after the Effective Date.	<p>PMU to arrange training and keep records.</p> <p>CSU E&S Team to prepare and deliver training.</p>
CS2	<p>Project workers and other stakeholders to receive training on:</p> <ul style="list-style-type: none"> • Project's E&S instruments and compliance requirements with the WB ESSs. • Stakeholder engagement and Grievance mechanism implementation • Roles and Responsibilities for ES management • GBV and SEA/SH prevention and awareness raising. • Community and worker health and safety. 	On inception of all new workers to the project and on regular intervals throughout Project Implementation	<p>PMU to arrange training and keep records.</p> <p>CSU E&S Team to prepare and deliver training.</p>
CS3	CSU to develop an environmental and social capacity building and training plan for PMU E&S Officers and contractors.	No later than 3 months after the Effective Date.	CSU E&S Team to prepare plan and deliver training.
CS4	CSU and PMU E&S Specialists and other project workers as relevant to receive training, as offered by external training providers, on areas of environmental and social risk management to support their capacity building.	Throughout project implementation.	PMU

