

*Program for the Acceleration of the Digital Transformation of
Cameroon*
(PATNuC)

Draft
ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)

23 August 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Cameroon (hereinafter the Recipient) shall implement the Program for the Acceleration of the Digital Transformation of Cameroon (the Project), with the involvement of the Ministry of Posts and Telecommunications (MINPOSTEL); the Project Implementation Unit (PIU) and the National Steering Committee (NSC). The International Development Association (hereinafter the Bank) has agreed to provide financing for the Project.
2. The Republic of Cameroon shall implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (ESSs). This Environmental and Social Commitment Plan (ESCP) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The Republic of Cameroon shall also comply with the provisions of any other Environmental and Social (E&S) documents required under the ESSs and referred to in this ESCP, such as the Environmental and Social Management Framework (ESMF), Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), and the timelines specified in those E&S documents.
4. The Republic of Cameroon is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Association by The Republic of Cameroon as required by the ESCP and the conditions of the legal agreement, and the Bank shall 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 Republic of Cameroon 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, the Recipient shall agree to the changes with the Bank and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Bank and the Recipient. The Republic of Cameroon shall promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, The Republic of Cameroon *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
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 documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s) sensitive to Gender Based Violence, Sexual Exploitation and Abuse, and Sexual Harassment (GBV/SEA/HS).</p>	Quarterly throughout the Project implementation period, starting 3 months after the Effective Date, to be submitted within 30 days after the end of the period.	MINPOSTEL /PATNUC PIU
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 ESHS risks, inappropriate disposal of hazardous wastes, construction accidents that result in death, serious or multiple injury, events of acute pollution due to air or noise emissions, any allegations of gender-based violence and/or sexual exploitation, abuse and harassment (GBV/SEAH).</p> <p>Provide sufficient detail regarding 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 supervising entity, as appropriate. Subsequently, as per the Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	Notify the Bank immediately of any incident or accident within 48 hours after becoming aware of the incident or accident, followed by a detailed report on the incident within the timeframe established by the Bank following the initial notification.	MINPOSTEL /PATNUC PIU
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>Contractors and sub-contractors hired for the project activities or sub-activities, are required to provide monthly monitoring reports to the PATNUC PIU regarding ESHS performance of the contracted work. Such monthly monitoring reports shall be submitted to the Bank by the Borrower upon request.</p>	<i>Monthly reporting for contracted work throughout contract/sub-contract period, to be submitted within 15 days after the end of the period. Contractor/sub-contractor monthly reports shall be submitted to PATNUC PIU starting from the first month of engagement.</i>	Contractor(s)/Sub-contractor(s)
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p>	The OHS/Environment and Social specialists as well as the GBV/ SEAH consultant shall be contracted or appointed not later than 90 days after the	MINPOSTEL /PATNUC PIU

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>Establish an organizational structure within the Project Implementation Unit (PIU) with qualified staff to support the management of ESHS risks of the Project. The Borrower shall recruit an OHS/Environment specialist and a Social specialist with GBV and gender skills to support social risks management related to the implementation of ESF standards. The Borrower shall also recruit a GBV/SEAH consultant to support the management of project related GBV/SEAH project risk.</p>	<p>Effective Date and shall be maintained throughout the implementation of the Project.</p>	
<p>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>a) Assess the environmental and social risks and impacts including SEA/SH risks of proposed Project activities, in accordance with ESS1 and the Environmental and Social Management Framework (ESMF) to be finalized, disclosed, consulted and adopted for the Project to ensure that individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, have access to the development benefits resulting from the Project. The ESMF included: ToR for SESA and a Health, Safety, and Environmental (HSE) plan and a template for Environmental and Social Management Plan (ESMP) as necessary for subprojects.</p> <p>b) Prepare, disclose, adopt, and implement any environmental and social management plans or other instruments required for the respective Project activities based on the assessment process, in accordance with the ESSs, the ESMF, the WB EHSs, and other relevant Good International Industry Practice (GIIP) in a manner acceptable to the Bank to, for inter alia, ensure access to and allocation of Project benefits in a fair, equitable and inclusive manner, taking into account the needs of individuals or groups who, because of their circumstances, may be disadvantaged or vulnerable.</p> <p>c) Incorporate the relevant aspects of this ESCP, including, inter alia, any environmental and social management plans, ESS2 requirements, and any other required ESHS measures, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply with the ESHS specifications of their respective contracts. Thereafter ensure that the contractors and supervising firms comply with the ESHS specifications of their respective contracts.</p>	<p>a) ESMF was prepared, consulted, disclosed and adopted prior to Appraisal. The ESMF shall be implemented throughout Project implementation.</p> <p>Health, Safety, and Environmental (HSE) plan was elaborated as part of the ESMF.</p> <p>b) Plans/instruments shall be prepared, consulted upon, disclosed, and adapted before carrying out relevant Project activities and before any procurement/RFP take place so that project related E&S specifications are integrated in the bidding documents; and thereafter throughout the project.</p> <p>c) Before launching the procurement process for the relevant Project activities, and thereafter throughout the carrying out of such activities.</p>	<p>MINPOSTEL PATNUC PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>The project shall involve direct workers (employed in the PIU) and contractor workers. The management of project's workforce shall be carried out in accordance with the applicable requirements of ESS2. A labor management procedures (LMP) shall be prepared and shall include adequate occupational health and safety measures (including emergency preparedness and response measures), codes of conduct including clauses and sanctions against SEA/SH, setting out grievance arrangements for Project workers, as well as codes of conduct that address SEA/SH, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. LMP's provisions shall be applied to all workers (direct and contractors' workers) involved in project's activities.</p>	<p>LMP was prepared and disclosed prior to Appraisal. The LMP will be updated and revised periodically as necessary.</p> <p>The LMP shall be implemented throughout Project implementation.</p>	MINPOSTEL /PATNUC PIU
	<p>OCCUPATIONAL HEALTH AND SAFETY: The Recipient shall implement adequate occupational health and safety measures (including emergency preparedness and response measures) in line with the ESMF, LMP in a manner acceptable to the Bank.</p>	Throughout Project implementation.	MINPOSTEL /PATNUC PIU
	<p>WORKERS CODE OF CONDUCT: The Recipient shall ensure that all tender documents, works contracts or service contracts other than consultancy services under the Project require suppliers / service providers, sub-contractors or consultants to adopt a code of conduct which shall be handed over to all workers for signature. This code of conduct shall apply to contracts or services other than consultancy services, ordered or carried out under such contracts or contracts, shall cover in particular gender-based violence, violence against children and sexual exploitation and abuse, include an action plan for their effective application, and provide training to this end.</p>	Throughout Project implementation.	MINPOSTEL /PATNUC PIU
	<p>CHILD LABOR AND MINIMUM AGE: The Recipient shall prohibit child labor (any person under the age of 18) due to the hazardous work situation. This shall be clearly outlined in the LMP.</p>	Throughout Project implementation.	MINPOSTEL /PATNUC PIU
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. The LMP to be prepared (section 2.1 shall include a comprehensive workers' GRM).</p>	A section on worker's GRM was included in the LMP, which has been prepared and disclosed by the Borrower. The LMP will be updated and revised periodically as deemed necessary.	MINPOSTEL /PATNUC PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
		Grievance mechanism operational prior engaging Project workers and maintained throughout Project implementation.	
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN: The ESMF shall; (i) identify key E&S risks and impacts associated with the installation optic fibers and related waste; (ii) set out generic mitigation measures; and (iii) make provisions for electronic waste handling, transport, and disposal, arising from the construction work. It shall also include as assessment and quantification of the GHG emissions (if the assessment is deemed technically and financially feasible	ESMF was prepared, consulted, disclosed and adopted prior to Appraisal. The ESMF shall be implemented throughout Project implementation	MINPOSTEL /PATNUC PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>SECURITY MANAGEMENT PLAN: In principle, projects activities shall not be implemented in conflict areas. But if the Client decides to cover North West, South West, and Far North Regions of Cameroon, a security risk assessment (SRA) shall be conducted, and security management plan (SMP) prepared in accordance with applicable national law requirements, WB policy and guidelines, and GIIP in a manner acceptable to the Bank.</p> <p>Other relevant aspects of this standard shall be considered, as needed, under action 1.2 above including, inter alia, measures to assess and manage specific risks and impacts to the community, and traffic and road safety risks, and necessary assessments and management plans (such as road safety assessment, traffic management plan, emergency preparedness and response plans, etc) are prepared in accordance with National requirements, WB policy and guidelines, and GIIP in a manner acceptable to the Bank.</p>	SRA and SMP to be prepared prior to activities implementation in Far North, North West, and South West regions and prior to any procurement/RFP of activities in these regions, so that necessary security specifications are included in the bidding documents.	MINPOSTEL PATNUC PIU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
5.1	<p>Project activities shall involve the installation of digital infrastructure in rural areas is planned. Carrying out this activity shall require land acquisition for the installation of optic cable and the construction of antenna towers/poles. This could lead to permanent or temporary physical and/or economic displacement. A Resettlement Policy Framework (RPF) shall be prepared, consulted upon and disclosed by appraisal. The RPF shall set basic PAPs identification, assets valuation, economic and resettlement principles that shall be applied in case of land taking.</p> <p>Specific RAPs shall be prepared during project's implementation in accordance with RPF and before conducting any ESS5 related activity (such as economic and physical displacement etc.).</p>	<p>RPF was prepared, consulted upon, and disclosed and prior to Appraisal.</p> <p>RAPs to be prepared in accordance with RPF and before conducting any ESS5 related activity (such as economic and physical displacement etc.) and implemented throughout project's implementation.</p>	MINPOSTEL PATNUC PIU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
Relevant aspects of this standard shall be considered, as needed, under action 1.2 above including, inter alia, measures to ensure that activities do not take place on or adversely impact biodiversity and environmentally sensitive areas, particularly natural or critical habitats.			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	<p>The project shall be implemented in some areas where Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Communities (IP/SSAHUTLCs) are present. In order to ensure that IP/SSAHUTLCs have access to activities to be implemented, the PIU shall ensure that they are fully informed, consulted, and kept involved during the project design and implementation phases. The PIU shall ensure that IP/SSAHUTLCs affected by the project have access to the project Grievance Mechanism (GM) through which they can provide their feedback and submit complaints in a culturally appropriate manner. An Indigenous Peoples Planning Framework (IPPF) shall be prepared, consulted upon, and disclosed by appraisal. The IPPF shall set out the principles for participation in the project for IPs and provide orientation regarding specific activities to be conducted for them with respect to digital transformation; it shall also include guidance on consultations to be organized when preparing site-specific Indigenous Peoples' Plan (IPP).</p> <p>Site-specific Indigenous Peoples Plans (IPPs) shall be prepared when the final project's footprint is known.</p>	<p>IPPF was prepared, consulted upon, and disclosed prior to Appraisal.</p> <p>Specific IPP (s) to be prepared no later than two months after the Effective Date</p>	MINPOSTEL PATNUC PIU
ESS 8: CULTURAL HERITAGE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
Relevant aspects of this standard shall be considered in the ESMF, as needed, under action 1.2 above including, inter alia, measures to implement chance find procedures.			
ESS 9: FINANCIAL INTERMEDIARIES			
ESS 9 is not Relevant			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION: Key project's stakeholders shall include the Government of Cameroon (MINPOSTEL and other specialized organizations as CAMTEL), environmental NGOs, CSOs, populations at rural and urban areas and small and medium enterprises. Given the multisectoral nature of this project, which involves agriculture and livestock stakeholders in particular, stakeholder engagement shall be critical. A draft Stakeholder Engagement Plan (SEP) proportional to the nature and scale of the project shall be prepared, consulted upon and disclosed by appraisal.</p> <p>The SEP shall be updated throughout the project cycle depending on field operations dynamics/or intervention of new stakeholders.</p>	<p>The draft SEP was prepared and disclosed. The SEP shall be updated, when necessary, throughout Project implementation.</p>	MINPOSTEL PATNUC PIU
10.2	<p>PROJECT GRIEVANCE MECHANISM: 1. Establish, maintain and operate a grievance mechanism, as described in the SEP. Besides, the preparation of workers GRM, a comprehensive project's GRM shall be prepared to ensure that stakeholders' or beneficiaries are filed up and processed/addressed on time.</p> <p>2. Provide quarterly reports to the Association on the functioning of the GRM.</p>	<p>1. Project's GRM to be operational not later than two months after the Effective Date</p> <p>2. Submit to the Association quarterly monitoring reports throughout Project implementation support. The first report should be submitted not later than three (3) months after the Effective Date.</p>	MINPOSTEL PATNUC PIU
CAPACITY SUPPORT (TRAINING)			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
CS1	Training to be provided for PIU staff and key stakeholders on: <ul style="list-style-type: none"> • Environmental and Social Standards (ESS 1-10) • Environmental, Health and Safety Guidelines • Stakeholder Engagement Plan • Grievance Redress Mechanism • GBV/SEAH 	On commencement of PIU staff, especially, Project Manager, Grants Manager, Procurement Specialist, and Environment and Social Specialists; and throughout project implementation as need arise.	MINPOSTEL PATNUC PIU