

**Kingdom of Lesotho  
Ministry of Public Works and Transport**

**Lesotho Integrated Transport, Trade and  
Logistics Project (P502125)**

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

**April 12, 2024**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Lesotho (the Borrower) will implement the Lesotho Integrated Transport, Trade and Logistics Project (the Project), with the involvement of the Ministry of Public Works and Transport with the involvement of the following Ministries and agencies: Ministry of Finance, Ministry of Development Planning, Ministry of Trade and Industry, Roads Directorate as an implementing agency and Revenue Services Lesotho, as set out in the Loan Agreement. The International Development Association (the Bank), has agreed to provide financing (P502125) for the Project, as set out in the referred agreement(s).
2. The Borrower 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 Bank. The ESCP is a part of the Loan Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower 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 Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Bank.
4. As agreed by the Bank and the Borrower, 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 Borrower through the Ministry of Agriculture Food Security and Nutrition, Ministry of Trade, Industry and Small Business, Ministry of Public Works and Transport, Revenue Services Lesotho and the Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Minister, of the Ministry of Trade, Industry and Small Business and Ministry of Public Works and Transport. The Borrower shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Bank 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&amp;S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>	<p>Submit quarterly reports to the Bank throughout Project implementation, commencing after the Effective Date. Submit each report to the Bank no later than 10 days after the end of each reporting period.</p>	<p>MOPWT(RD) MTISB.</p>
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly notify 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, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury, major hydrocarbon spillages, detrimental river sedimentation, fatalities, serious injuries and project related road traffic accidents. 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 Bank’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 Bank no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the Bank within a timeframe acceptable to the Bank.</p>	<p>MOPWT MTISB</p>
C	<p><b>CONTRACTORS’ MONTHLY REPORTS</b></p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts, and submit such reports to the Bank.</p>	<p>Submit the monthly reports to the Bank as annexes to the reports to be submitted under action A above.</p>	<p>MOPWT MTISB</p>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Maintain qualified staff and resources within the Roads Directorate and CAFI to support management of Environmental and Social risks and impacts for Component 1 and Component 2, respectively, and appoint a Project Health and Safety Specialist as part of the staff compliment in the Roads Directorate.</p>	<p>Maintain the organizational structure as set out in the legal agreement throughout project implementation Appoint a Health and Safety Specialist, within 30 days from effective date and thereafter maintain these positions throughout Project implementation.</p>	
1.2	<p><b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p>		<p>MOPWT and MTISB</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>1. Update, adopt, implement and disclose the Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for the upgrading of Katse to Thaba-Tseka Road corridor to paved standard component of the Project, consistent with the relevant ESSs and in a manner acceptable to the Bank.</p> <p>2. Prepare, adopt, implement and disclose site specific ESMPs for : (i) Smart One-Stop Border Post facilities at Maseru Bridge and Maputsoe-Ficksburg border crossings, and improvement of Qacha’s Nek border facilities, (ii) Inspection and laboratory testing facilities , and (iii) Climate controlled community-level horticulture packing and storage facilities (cold chain) consistent with the relevant ESSs and in a manner acceptable to the Bank.</p>	<p>1. Update, adopt, implement and disclose the ESIA and ESMP prior to launching of bidding documents and physical works and thereafter implement the ESIA and ESMP throughout Project implementation.</p> <p>2. Prepare, adopt, implement and disclose the ESMP prior to launching of bidding documents and physical works, and thereafter implement the ESMPs throughout Project implementation.</p>	
1.3	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&amp;S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p>	<p>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise contractors throughout Project implementation.</p>	<p>MOPWT MTISB</p>
1.4	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	<p>Throughout Project implementation.</p>	<p>MOPWT MTISB</p>
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p>	<p>Prior to commencement of civil works.</p>	<p>MOPWT MTISB</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.		
2.2	<b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b> Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Prior to commencement of civil works.	MOPWT MTISB
2.3	<b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b> Prepare, adopt and implement and Occupational Health and Safety (OHS) Plan as part of the ESMP under action 1.2(1) and 1.2(2), in line with the requirements of ESS2, and World Bank Group Environmental, Health and Safety Guidelines.	Same timeframes as the preparation of the ESMPs under action 1.2(1) and 1.2(2) and thereafter implement throughout the Project lifecycle.	MOPWT MTISB
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<b>WASTE MANAGEMENT PLAN</b> Adopt and implement a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes, consistent with ESS3 as part of the ESMP prepared under action 1.2 (1) and 1.2(2).	Adopt the WMP, within the timeframe stipulated for action 1.2(1) and 1.2(2) and thereafter implement the WMP throughout Project implementation.	MOPWT MTISB
3.2	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under actions 1.2(1) and 1.2(2).	Same timeframe as for the adoption and implementation of the ESMPs stipulated under actions 1.2(1) and 1.2(2)	MOPWT MTISB
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>TRAFFIC AND ROAD SAFETY</b> Prepare, adopted and implement a traffic management plan as part of the ESMP to be prepared under action 1.2(1). The traffic management plan should incorporate site specific measures to manage traffic and road safety risks.	Same timeframe as for the adoption and implementation of the ESMP.	MOPWT MTISB
4.2	<b>COMMUNITY HEALTH AND SAFETY</b> Assess and manage specific risks and impacts to the community arising from Project activities [, including, inter alia,] [specify any areas of risks that may require emphasis, e.g., behavior of Project workers, risks of labor influx, response to emergency situations], and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.	Same timeframe as for the adoption and implementation of the ESMPs.	MOPWT MTISB
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<b>RESETTLEMENT PLANS</b>	Prior to commencement of civil works.	MOPWT MTISB

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Adopt and implement a site-specific Resettlement Action Plan(s), as needed, for the Project, consistent with ESS5.		
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p><b>BIODIVERSITY RISKS AND IMPACTS</b></p> <p>1. Assess the potential risks and impacts to biodiversity as part of the updating of the ESIA and ESMP stipulated under action 1.2(1), consistent with ESS6 and incorporate mitigation measures to avoid, minimize and reduce biodiversity risks and impacts associated with the project, to the satisfaction of the Bank.</p> <p>2. Assess and incorporate mitigation measures to avoid, reduce or minimize any potential risks and impacts on biodiversity as part of the ESMPs stipulated under action 1.2(2).</p>	<p>1. Same timeframe as stipulated for action 1.2(1).</p> <p>2. Same timeframe as stipulated for action 1.2(2).</p>	MOPWT MTISB
<b>ESS 8: CULTURAL HERITAGE</b>			
8.2	<p><b>CHANCE FINDS</b></p> <p>Describe and implement the chance finds procedures, as part of the ESMPs to be prepared under action 1.2(1) and 1.2(2) of the Project.</p>	Same timeframes as stipulated for the preparation of the ESMPs under action 1.2(1) and 1.2(2).	MOPWT MTISB
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
	Not applicable		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b></p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, including procedures for Grievance Redress Mechanism (GRM), 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.</p>	Prior to Appraisal.	MOPWT MTISB
<b>CAPACITY SUPPORT</b>			
CS1	<p>Training and capacity building initiatives for the Project will incorporate as a minimum the following Environmental and Social aspect:</p> <p>For the PIU staff:</p> <ul style="list-style-type: none"> <li>▪ Training on Environmental and Social Standards applicable to the project.</li> </ul>	Throughout the project implementation	MOPWT MTISB

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none"> <li>▪ Stakeholder engagement including community engagement and mapping.</li> <li>▪ Grievance Redress Mechanism.</li> <li>▪ Environmental and social aspects of the project including OHS and incident reporting requirements.</li> <li>▪ Project supervision, monitoring and reporting.</li> <li>▪ GBV, SEA/SH aspects.</li> <li>▪ Labour Management.</li> <li>▪ Climate Change and Climate Resilience Mainstreaming in Environmental Management.</li> </ul> <p>For the Contractor:</p> <ul style="list-style-type: none"> <li>▪ Occupational Health and Safety including aspects of hazards and risks, emergency preparedness and response measures and incident reporting and investigation.</li> <li>▪ Grievance Redress Mechanism for workers.</li> <li>▪ Key environmental and social risks and impacts of works.</li> <li>▪ Community health and safety aspects including GBV, SEA/SH, traffic safety etc.</li> <li>▪ Labour management.</li> </ul>		