

Kingdom of Lesotho
Ministry of Public Works and Transport

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

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

Updated
15th May, 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Lesotho (the Recipient) is implementing the Lesotho Integrated Transport, Trade and Logistics Project (the Project), with the involvement of the Ministry of Finance, Ministry of Public Works and Transport, Ministry of Development Planning, Ministry of Trade and Industry, as set out in the Original and First Additional Financing. The International Development Association (the Bank) has agreed to provide the original financing and additional financing for the Project, as set out in Agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for the Project referred to above.
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 Bank. The ESCP is a part of the Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement[s].
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 Bank. Said E&S documents may be revised from time to time with prior written agreement by the Bank. As provided for under the referred Agreement[s], the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Bank and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Bank and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Recipient Representative specified in the Agreements. 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 SUPPORT¹			
A	ORGANIZATIONAL STRUCTURE a. Maintain a Project Management Unit for Components 1,3 and 4 with qualified staff from the Roads Directorate and a Project Management Unit for Component 2 with qualified staff and resources from CAFI; to support management of environmental, social, health and safety (E&S) risks and impacts of the Project including a Social Specialist, an Environmental Specialist, and a occupational health and safety specialist.	Maintain a PMU and Appoint a Health and Safety Specialist, prior to commencing with physical works and thereafter maintain these positions throughout Project implementation.	MOPWT MTISB
B	CAPACITY BUILDING PLAN/MEASURES Prepare and implement the following capacity building measures: training for PMU and Project workers on traffic management, occupational safety including risk assessment and incident investigation, stakeholder engagement and mapping, grievance redress and SEA/SH	Implement throughout the project.	PMU RD and PMU CAFI
MONITORING AND REPORTING			
C	REGULAR REPORTING Prepare and submit to the Bank 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 mechanism(s), the grievance log, and progress made in resolving them. - E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports.	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.	PMU RD and PMU CAFI

¹ For all actions, consult with the country lawyer to ensure consistency with the legal agreement in cases where some actions need to be completed before the project becomes effective (effectiveness condition) or before certain disbursements can occur (disbursement condition).

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Number and status of resolution of incidents and accidents reported under action E below.		
D	CONTRACTORS' MONTHLY REPORTS Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Bank.	Submit the monthly reports as annexes to the reports to be submitted under action C above.	PMU RD and PMU CAFI
E	INCIDENTS AND ACCIDENTS Notify the Bank 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; dam failure; 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 Bank upon request. Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank, 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 Bank 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 Bank no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.	PMU RD and PMU CAFI
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS 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, consistent with the relevant ESSs and in a manner acceptable to the Bank. 2. Prepare, adopt, implement and disclose site specific ESMPs for activities to be conducted under Component 2, consistent with the relevant ESSs and in a manner acceptable to the Bank.	1. Update, adopt and implement the ESIA and ESMP prior to launching of the bidding documents and thereafter implement the ESIA and ESMP throughout Project implementation. 2. Prepare the ESMP prior to launching the bidding documents, and thereafter implement the ESMP throughout Project implementation.	1. PMU RD 2. PMU CAFI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	3. Prepare, adopt, implement and disclose site specific ESMPs for activities related to the runway rehabilitation, fencing and equipment installation, consistent with the relevant ESSs and in a manner acceptable to the Bank	3. Prepare the ESMP prior to launching the bidding documents, and thereafter implement the ESMP throughout Project implementation.	3. PMU RD
1.2	MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including, inter alia, [specify relevant E&S assessments or plans], the Labor Management Procedures, and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms 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/subcontractors and supervision firms to the Bank.	As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation]. Copies of relevant contracts provided to the Bank upon request.	PMU RD and PMU CAFI
1.3	TECHNICAL ASSISTANCE Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Bank, 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.	PMU RD and PMU CAFI
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Update and implement the Labor Management Procedures (LMP) for the Project.	Throughout Project implementation.	
2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN 1. Prepare and implement a sub-project specific OHS Management Plan for Component 1 to assess and manage the OHS risks and impacts related to the Thaba-Tseka Road corridor consistent with ESS2 and the World Bank Environmental, Health and Safety Guidelines 2. Prepare and implement a sub-project OHS Management Plan to assess and manage the OHS risks and impacts related to the activities under Component 2 consistent with ESS2 and the World Bank Environmental, Health and Safety Guidelines	1.,2. & 3. Prepare the sub-project OHS Management Plan(s) prior to launching of the bidding documents and thereafter implement the plan throughout Project implementation.	1 and 3 PMU RD 2. PMU CAFI 4. PMU RD and PMU CAFI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	3. Prepare and implement a sub-project OHS Management Plan for Component 4 to assess and manage the OHS risks and impacts related to the rehabilitation of the runway, fencing and equipment installation at the airport consistent with ESS2 and the World Bank Environmental, Health and Safety Guidelines 4. Require contractors and subcontractors to prepare and implement OHS Management Plans in accordance with the relevant sub-project OHS Management plans mentioned above.	4. Submit Contractors OHS Plan for no objection no later than 20 days prior to the commencement with construction or within the timeframe prior agreed with the Bank.	
2.3	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Throughout Project implementation.	
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Prepare and implement a Waste Management Plan (WMP), as part of the ESMP prepared under 1.1(1), 1.1(2) and 1.1(3) for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS3.	Prepare the WMP within the same timeframe as for the preparation and implementation of the ESMPs mentioned in 1.1	PMU RD and PMU CAFI
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under 1.1(1), 1.1(2) and 1.1(3) above.	Same timeframe as for the preparation and implementation of the ESMP.	PMU RD and PMU CAFI
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Require the contractor to prepare and implement a Traffic Management TM Plan to manage traffic and road safety risks related to the Thaba-Tseka Road corridor. Conduct a comprehensive life and fire safety audit of the existing airport building, with particular focus on the airport terminal currently undergoing refurbishment and considered an associated facility. Based on the findings, prepare a corrective action plan addressing identified deficiencies and risks, and implement the plan in accordance with agreed timelines to ensure compliance with applicable life and fire safety standards.	Submit Contractors TM Plan for no objection no later than 20 days prior to the commencement with construction or within the timeframe prior agreed with the Bank Same timeframe as for the preparation and implementation of the ESMPs in 1.1	PMU RD

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities and include mitigation measures in the ESMPs to be prepared under 1.1(1), 1.1(2) and 1.1(3)	Same timeframe as for the preparation and implementation of the ESMPs in 1.1	PMU RD and PMU CAFI
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT [The relevance of ESS5 is established during the ESA process. If resettlement documents need to be prepared (e.g., resettlement process frameworks, resettlement action plans, process frameworks) this should be reflected in the ESCP. See <u>sample actions below</u>]			
5.1	RESETTLEMENT [FRAMEWORK] [PLAN] or [PLANS] Prepare and implement a Resettlement Action Plan (RAP) in line with ESS5.	Prior to carrying out the relevant works, including ensuring that before taking possession of the land and related assets, full compensation has been provided and, as applicable, displaced people have been resettled and moving allowances have been provided.	PMU RD and PMU CAFI
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS 1. Assess the potential risks and impacts to biodiversity as part of the updating of the ESIA and ESMP stipulated under action 1.1(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. 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 1.1(2).	1. Same timeframe as stipulated for action 1.1(1). 2. Same timeframe as stipulated for action 1.1(2).	PMU RD and PMU CAFI
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES [See examples of possible actions below that can be used if determined that ESS7 is relevant, as set out in paragraph 54 of the E&S Policy and paragraphs 8-10 of ESS7.]			
ESS 8: CULTURAL HERITAGE [			
8.2	CHANCE FINDS	Same timeframe as stipulated for the ESMPs in 1.1	PMU RD and PMU CAFI

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Describe and implement the chance finds procedures as part of the ESMPs prepared under 1.1(1), 1.1(2) and 1.1(3) of the Project.		
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
	Not relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN Update and implement a Stakeholder Engagement Plan [(SEF)] [(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.	Throughout Project implementation.	PMU RD and PMU CAFI
10.2	PROJECT GRIEVANCE MECHANISM 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. 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.	Throughout Project implementation.	PMU RD and PMU CAFI
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness: 1.1(1) Final revised ESIA and ESMP for the upgrading of Katse to Thaba-Tseka Road corridor 1.1(2) ESMP for Component 2 1.1(3) ESMP for runway rehabilitation, fencing and equipment installation			