



GOVERNMENT OF LIBERIA

**MINISTRY OF POSTS AND
TELECOMMUNICATIONS**

**Western Africa Regional Digital Integration
Program - Series of Projects 2 (P500628)**

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

Negotiated Version

February 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

The Government of Liberia (the Borrower) will implement the Western Africa Regional Digital Integration Program - Series of Projects 2 (P500628) (the Project), with the involvement of the Ministry of Posts and Telecommunications (MoPT), as set out in the Financing Agreement (the Agreement). The International Development Association (the Association) has agreed to provide financing for the Project, as set out in Agreement.

1. 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 Association. 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.
2. 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, 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 Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreement, the Borrower shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
3. As agreed by the Association and the Borrower, 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 Association and the Borrower agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Borrower's Representative specified in the Agreement. The Borrower shall promptly disclose the updated ESCP.
4. 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	<p>ORGANIZATIONAL STRUCTURE</p> <ol style="list-style-type: none"> 1. Establish and maintain a Project Implementing Unit (PIU) within the Ministry of Posts and Telecommunications that is tasked with E&S management, with qualified staff and resources to support management of Environmental, Social, Health and Safety (ESHS) risks and impacts of the Project including one (1) Social and GBV Specialist and one (1) Environmental Specialist. 2. Recruit and maintain qualified staff, including one (1) Environmental Specialist and one (1) Social and GBV Specialist (either through direct recruitment or through recruitment of a specialized firm) within the SPV to oversee the implementation of Environmental, Social, Health and Safety Risk Management System (ESHSRMS), consistent with all relevant ESSs. 	<ol style="list-style-type: none"> 1. Establish a PIU and hire the Social and GBV Specialist and Environmental Specialist within 30 days after project effective date and thereafter maintain the PIU and these positions throughout Project implementation. 2. Ensure that Environmental Specialist and Social and GBV Specialist are in place at the SPV prior to the Association's disbursement of funds to the SPV. 	<p>MoPT</p> <p>SPV</p>

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
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement the following capacity building measures: Training for PIU staff, stakeholders, communities, Project workers on:</p> <ul style="list-style-type: none"> • Project Management (scope, implementation, monitoring and Reporting) • World Bank Environmental and Social Framework and Standards • National Environmental Requirements • Sub-project Screening and Scoping • Grievance Redress Mechanism • Community health and safety • Occupational Health and Safety • Environmental and Social Report preparation and other reporting requirements • GBV/SEA risk management and child rights protection • Gender and Disability inclusion • Information on World Bank’s Environmental and Social Incidents Reporting requirements • Emergency preparedness and response 	<p>A Training and Capacity Building Plan will be developed within 6–12 months after the Effective Date of the Original Financing Agreement and implemented throughout the duration of the Project. Training activities will be conducted continuously during project implementation, including pre-construction training for contractors prior to the commencement of any work or services, and refresher training programs as needed throughout contract execution. Quarterly training and capacity-building progress reports will be submitted to the Association throughout Project implementation, starting from the Project Effective Date.</p>	MoPT/PIU
MONITORING AND REPORTING			
C	<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. The reports shall include:</p> <ul style="list-style-type: none"> • 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. 	<p>Submit quarterly reports to the Association throughout Project implementation. Submit each report to the Association no later than 15 days after the end of each reporting period.</p>	MoPT/PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> Number and status of resolution of incidents and accidents reported under action E below. 		
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>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 Association.</p>	Submit the monthly reports to the Association as annexes to the reports to be submitted under action C above.	MoPT/PIU
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Association 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 Association upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, 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.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request. The deadline is 24 hours for death and SEA-SH cases. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.</p>	MoPT/PIU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <p>1. Prepare, consult, disclose and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs. The ESMF includes Resettlement Framework (RF), Chance Find Procedures and Grievance Mechanism (GM).</p>	<p>1. A Environmental and Social Management Framework (ESMF) has been prepared and disclosed (December 23, 2025). The finalized ESMF will be implemented and monitored throughout Project implementation.</p>	MoPT/PIU

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ol style="list-style-type: none"> 2. Prepare, consult, disclose and implement site-specific Environmental and Social Impact Assessments (ESIA) and or Environmental and Social Management Plans (ESMP) for the project activity following screening as set out in the ESMF and consistent with the relevant ESSs. 3. Incorporate the ESMP as part of the respective procurement and bidding documents for the respective project activity that requires the preparation of such ESMP. 4. Prepare, consult, disclose and implement site-specific Resettlement Plan (RP) and/or a Livelihood Restoration Plan (LRP) for the project activity following screening as set out in the ESMF and consistent with ESS5. 5. Prepare and implement other site-specific instruments including Occupational Health and Safety (OHS) Plan, Waste Management Plan (WMP), Traffic and Road Safety Management Plans (TRSMs), Chemical Storage Plans (CSP), Cultural Heritage Management Plans (CHMP), Emergency Preparedness and Response Plan (EPRP) and Biodiversity Management Plan (BMP) will be prepared as part of the respective project activity ESIA/ESMP and or the Contractor Environmental and Social Management Plans (C-ESMPs), where applicable. 6. Prepare, disclose and implement a project Labor Management Procedures (LMP). 7. Assess the potential risks of Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) to identify the typology and develop an appropriate SEA/SH Action Plan and Accountability Framework proportionate to the risks identified. 8. Require contractors engaged under the Project to prepare and implement Labor Management Plans (LMPs) as part of C-ESMPs. These plans will outline measures for fair labor practices, worker health and safety, grievance redress mechanisms, and compliance with the Project’s LMP and ESS2 requirements. 9. Conduct an assessment of the electronic waste generation during project implementation, and if required, an Electronic Waste Management Plan will be prepared to ensure proper handling, recycling, and disposal of e-waste during the operational phase. 	<ol style="list-style-type: none"> 2. Prepare the Environmental and Social Impact Assessment (ESIA) and/or Environmental and Social Management Plan (ESMP) prior to the bidding process or commencement of the respective Project activity, and thereafter implement the ESIA and/or ESMP throughout the implementation of the activity. 3. Incorporate ESMP as part of the respective procurement and bidding documents prior to launching the procurement process for the respective activity. 4. Prepare and implement the RP and/or a Livelihood Restoration Plan (LRP) prior to commencement of respective Project activity. 	<p>MoPT/PIU/SPV</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		<ol style="list-style-type: none"> <li data-bbox="1444 261 1780 516">5. Prepare site-specific instruments including OHS Plan, WMP, TRSMP, CSP, CHMP, EPRP, and BMP, prior to the commencement of corresponding project activities. <li data-bbox="1444 553 1780 776">6. The LMP will be prepared, disclosed, and adopted within 1 month after the Project Effective Date and implemented throughout Project implementation. <li data-bbox="1444 813 1780 971">7. Prepare SEA/SH Action Plan and Accountability Framework within three (3) months after the Project Effective Date. <li data-bbox="1444 1008 1780 1230">8. The C-LMPs will be prepared, reviewed, and approved prior to commencement of works and implemented throughout Project implementation. 	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		9. The assessment will be conducted within twelve (12) months after the Effective Date, and if required, the EWMP will be prepared, approved, and disclosed within fifteen (15) months after the Effective Date.	
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the ESIA, ESMP, 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 Association.</p>	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Association upon request.</p>	MoPT/PIU
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including technical feasibility 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 and that are consistent with the ESSs. Thereafter, ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	MoPT/PIU
1.4	<p>CONTINGENT EMERGENCY EARLY RESPONSE FINANCING</p> <p>1. Ensure that the CERC Manual as specified in the legal agreement includes a description of the E&S assessment and management arrangements including, CERC-ESMF/ESMF Addendum that will be included or referred to in the CERC Manual for the implementation of CERC component, in accordance with the ESSs.</p>	1. The preparation of the CERC-ESMF/ESMF Addendum and other E&S documents, in accordance with relevant ESSs in form and substance acceptable to the Association is a withdrawal condition under Section of	MoPT/PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	2. Implement the E&S provisions of the CERC Manual including the CERC-ESMF/ESMF Addendum, and any assessments and plans required therein.	Schedule 2 of the legal agreement. 2. In accordance with the timeframes specified in the CERC Manual including, the CERC-ESMF/ESMF Addendum, and any assessments and plans required therein.	
1.5	ASSOCIATED FACILITIES Not relevant to the project. The project currently does not include an associated facility.		
1.6	USE OF [BORROWER/RECIPIENT'S] ENVIRONMENTAL AND SOCIAL FRAMEWORK The project will not use the Borrower's E&S Framework.		
1.7	COMMON APPROACH Not relevant to the project. The project does not include other financial institutions.		
1.8	ACTIVITIES SUBJECT TO RETROACTIVE FINANCING Not relevant. The project does not include retroactive financing.		
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Include 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 in the Labor Management Procedures (LMP) to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the LMP.	MoPT/PIU
2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN		MoPT/PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Prepare and implement an OHS Management Plan to assess and manage the OHS risks and impacts of the Project, as part of the ESMPs indicated in action 1.1. above.	Same timeframe as for the preparation and implementation of the ESMP.	
2.3	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, as part of the LMP and consistent with ESS2.	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	MoPT/PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN 1. Prepare and implement a Waste Management Plan (WMP) to manage hazardous and non-hazardous waste, consistent with ESS3, as part of the ESMP indicated in action 1.1. 2. Conduct an assessment of the electronic waste generation during project implementation, and if required, an Electronic Waste Management Plan will be prepared to ensure proper handling, recycling, and disposal of e-waste during the operational phase.	1. Same timeframe as the ESMP. 2. The assessment will be conducted within twelve (12) months after the Effective Date, and if required, the EWMP will be prepared, approved, and disclosed within twenty-four (24) months after the Effective Date.	MoPT/PIU
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 action 1.1 above.	Same timeframe as for the preparation and implementation of the ESMP.	MoPT/PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY 1. Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.1 above.	1. Same timeframe as for the preparation and implementation of the ESMP.	MoPT/PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>2. Require contractors to prepare and implement a Traffic and Road Safety Management Plan (TRSMP) as part of their C-ESMPs. The TRSMP will identify potential traffic and road safety risks during construction, outline mitigation measures to prevent accidents, and ensure the safety of workers, road users, and nearby communities. It will include provisions for vehicle routing, speed control, driver training, signage, and coordination with local authorities.</p>	<p>2. Same timeframe as the C-ESMP</p>	
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities, including, behavior of Project workers, risks of labor influx, response to emergency situations, and include mitigation measures in the ESMPs.</p>	<p>Same timeframe as for the preparation and implementation of the ESMPs.</p>	<p>MoPT/PIU</p>
4.3	<p>SEA AND SH RISKS</p> <p>Prepare and implement a SEA/SH Action Plan, to assess and manage risks of SEA/SH. The Plan will include provisions requiring contractors to adopt and enforce SEA/SH Codes of Conduct, mandatory worker training, establishment of referral pathways to qualified GBV service providers, and community awareness sessions (with women and youth) on SEA/SH risks and available reporting options.</p>	<p>Prepare the SEA/SH Action Plan within three (3) months after the project effective date and thereafter implement the SEA/SH Action Plan throughout Project implementation.</p>	<p>MoPT/PIU</p>
4.4	<p>SECURITY MANAGEMENT²</p>		<p>MoPT/PIU</p>

² Depending on security risks and details of the project, the Borrower may retain or engage public security personnel, including military, to provide security for the project. Such cases may require a specific security management assessment and/or security management plan and setting out specific measures and actions in the ESCP. See Annex to the “Tip Sheet: Drafting the Environmental and Social Commitment Plan” for further guidance.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Assess the security risks associated with Project implementation, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities and if required, prepare a Security Management Plan to ensure appropriate measures are in place to safeguard project workers, sites, assets, and activities. This will be guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.	The assessment will be conducted within twelve (12) months after the Effective Date, and if required, the Security Management Plan (SMP) will be prepared, approved, and disclosed within fifteen (15) months after the Effective Date.	
4.5	DAM SAFETY (FOR ANNEX A ESS4) Not relevant. The project does not include the construction and operations of Dams.		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT [FRAMEWORK] [PLAN] or [PLANS] 1. Prepare and implement a Resettlement Framework (RF) for the Project, consistent with ESS5 as part of the ESMF indicated in action 1.1. 2. Prepare, consult, disclose and implement a Resettlement Plan (RP) and/or a Livelihood Restoration Plan (LRP) for each activity under the Project for such RP or LRP is required, as set out in the ESMF and consistent with ESS5.	1. RF has been prepared and disclosed as a part of ESMF on December 23, 2025. 2. Prepare and implement the respective RP 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 displaced people have been resettled and moving allowances have been provided.	MoPT/PIU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Prepare, consult, disclose, and implement a Biodiversity Management Plan (BMP) as part of the ESIA/ESMP, in accordance with the guidelines of the ESIA prepared for the Project, and consistent with ESS6.	Same timeframe as ESIA/ESMP	MoPT/PIU/SPV.
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
7.1	INDIGENOUS PEOPLES [FRAMEWORK] [PLAN] or [PLANS] Not relevant		
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Prepare and implement a Cultural Heritage Management Plan (CHMP) as part of the ESMP, in accordance with the guidelines of the ESIA prepared for the Project, and consistent with ESS8.	Prepare the CHMP prior to commencement of civil works and thereafter implement the CHMP throughout Project implementation.	MoPT/PIU
8.2	CHANCE FINDS Prepare and implement the chance find procedures, as part of the ESMF to be prepared under action 1.1 above.	The chance find procedures have been prepared and disclosed as part of ESMF on December 23, 2025. Implement the procedures throughout Project implementation].	MoPT/PIU
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
9.1	ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS) Not relevant. The project activities in Liberia does not include Financial Intermediaries.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN Prepare and implement a Stakeholder Engagement Plan (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.	SEP has been prepared and disclosed on December 23, 2025 and thereafter implement the SEP throughout Project implementation.	MoPT
10.2	PROJECT GRIEVANCE MECHANISM	GM to be operational within three months after Project's Effective Date and maintained throughout the implementation of the Project.	MoPT/PIU

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. A Ministry Focal Point will work as a grievance officer for the project during the interim period until project GM is operational.</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>		
INDICATORS FOR IMPLEMENTATION READINESS		
<p>The following actions are indicators for implementation readiness:</p> <ul style="list-style-type: none"> (i) Established PIU and finalized organizational structure with staff- one Environmental Specialist and one Social and GBV Specialist (ii) Recruitment of one Environmental Specialist and one Social and GBV Specialist at SPV (iii) Implementation of Environmental and social Framework instruments (ESMF and SEP) (iv) The Project annual work plans and budget have dedicated line items for environmental and social risk management work; (v) Other project-specific requirements related to E&S readiness for implementation. (vi) Functional Grievance Mechanism established, and GM members trained 		