

# Republic of Malawi

## Ministry of Local Government, and Rural Development/ National Local Government Finance Committee<sup>1</sup>

### Governance to Enable Service Delivery Project - GESD 2.0 (P508024)

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

**[For Negotiations]<sup>2</sup>**

**[March 12, 2026]**

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<sup>1</sup> If the ESCP is being updated because of additional financing, in addition to the Project title, refer to the Additional Financing operation: [Project title] [P Number] and [Additional Financing] [P number].

<sup>2</sup> The version that will be part of the negotiations package can be titled "For negotiations". Once the ESCP is agreed at negotiations, the reference should be changed to "Negotiated" and dated the day of the conclusion of negotiations. If the ESCP is updated during implementation, the reference should be changed to "Updated" and the date should be revised the day of finalization of the update. ESCPs should always be dated and properly labelled.

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Malawi (the Recipient) through its Ministry of Local Government and Rural Development will implement Governance to Enable Service Delivery 2.0 (the Project), with the involvement of through the National Local Government Finance Committee (NLGFC), as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide the original financing for the Project, as set out in 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 Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the 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, 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 Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association 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 Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient Representative specified in the Agreement. 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
<b>IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT<sup>3</sup></b>			
A	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain a Project Implementation Team (PIT) within the National Local Governance Finance Committee under the Ministry of Local Government and Rural Development implementing the project with qualified staff and resources to support management of environmental, social, health and safety (ESHS) risks and impacts of the Project including a Social Safeguards Specialist, an Environmental Safeguards Specialist, and an Occupational Health and Safety Specialist.</p>	<p>Establish and maintain a PIT, as set out in the Financing Agreement. Hire or appoint one Social safeguards specialist, one Environmental Safeguards Specialist and One Occupational Health and Safety Specialist prior to project effectiveness and thereafter maintain the PIT and these positions throughout Project implementation</p>	<p>National Government Committee Local Finance PIT</p>
B	<p><b>CAPACITY BUILDING PLAN</b></p> <p>Prepare and implement a capacity building plan for PIT and District level staff ie Members of the District Environment Sub-Committee (DESC), covering the following:</p> <ul style="list-style-type: none"> <li>• Environmental and Social Risk Assessment</li> <li>• OHS requirements and Job Hazard Assessments</li> <li>• Community Health and Safety</li> <li>• SEA/ SH prevention and response</li> <li>• Resettlement planning and implementation</li> <li>• Grievance Management</li> <li>• Stakeholder Engagement</li> <li>• Contractor Management</li> </ul>	<p>Develop capacity building plan within 6 months of project effectiveness and implement thereafter.</p> <p>Trainings to be sourced and arranged by PIT for applicable project team and implementing agency staff, as needed throughout the project.</p>	<p>National Government Committee Local Finance PIT</p>
<b>MONITORING AND REPORTING</b>			
C	<p><b>REGULAR REPORTING</b></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>		

<sup>3</sup> 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
	<ul style="list-style-type: none"> <li>Status of preparation and implementation of E&amp;S documents required under the ESCP.</li> <li>Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan.</li> <li>Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them.</li> <li>E&amp;S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports.</li> <li>Number and status of resolution of incidents and accidents reported under action E below.</li> </ul>	Using the agreed reporting template, submit quarterly reports to the Association throughout Project Implementation, commencing from the Effective date. Submit each report to the Association no later than 30 days after the end of each reporting period.	National Local Government Finance Committee PIT
D	<p><b>CONTRACTORS' MONTHLY REPORTS</b></p> <p>Require contractors and supervising firms to provide monthly monitoring reports on E&amp;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 upon request.	National Local Government Finance Committee PIT
E	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>I. 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>II. 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>I. Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>II. 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>	National Local Government Finance Committee PIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b></p> <p>I. Prepare and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs. The ESMF shall include the description of Environmental and Social Management Framework (ESMF) with relevant Occupational Health and Safety (OHS) Framework, Labor Management Procedures (LMP), Waste and Hazardous Substances Management procedures, SEA/SH Action plan, emergency preparedness and response plan, and Traffic Management framework. It shall detail the screening process to identify the subproject activities' potential E&amp;S risks and determine relevant risk assessments and mitigation plans. It shall further include a generic Environmental and Social Management Plan (ESMP) to guide the development of site specific management plans for subproject ESMPs.</p> <p>II. Conduct independent E and S Audits after cycle 1 and cycle 2 and implement corrective actions.</p>	<p>I. Prepare and disclose the ESMF prior to disbursement under Component 1 and thereafter implement the ESMF throughout Project implementation.</p> <p>II. Conduct independent E and S audits after cycle 1 and cycle 2.</p>	National Local Government Finance Committee PIT
1.2	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS FOR SUBPROJECTS:</b></p> <p>I. Ensure screening of subprojects in accordance with the procedures described in the Environmental and Social Management Framework (ESMF) prepared for the Project.</p> <p>II. Require the District and Municipal Councils to prepare and implement the Subprojects Environmental and Social Management Plan (ESMPs), as set out in the ESMF. The proposed activities described in the exclusion list set out in 1.3 shall be ineligible to receive financing under the Project.</p>	<p>I. Screening and preparation of documents shall be done throughout Project implementation, prior to any new or changed works occurring.</p> <p>II. Prepare the ESMPs and incorporate the ESMPs as part of the respective bidding documents for the respective subprojects prior to the carrying out of subprojects that requires the preparation of such ESMPs. Once finalized, implement the respective ESMPs throughout Project implementation.</p>	National Local Government Finance Committee PIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.3	<p><b>EXCLUSION LIST</b></p> <p>The following activities/ subprojects shall be excluded from financing:</p> <ul style="list-style-type: none"> <li>i. Activities that have high probability of causing serious health and safety adverse effects to human health and/or the environment.</li> <li>ii. Activities that may have significant adverse social impacts and may give rise to significant social conflict. Activities that would result in significant levels of involuntary resettlement (physical and/ or economic).</li> <li>iii. Activities that may have risk/impact on cultural heritage.</li> <li>iv. Activities that cause or lead to child abuse, child labor exploitation, forced labor or human trafficking.</li> <li>v. Activities that result in involuntary restrictions on land use or access to legally designated parks and protected areas</li> <li>vi. Activities that may cause long term, permanent and/or irreversible (e.g. loss of major natural or critical habitat) impacts.</li> <li>vii. Activities that involve the transformation or degradation of critical habitats and may result in the loss of biodiversity, including any official protected natural areas, such as national parks and other protected areas, including culturally protected areas, or can cause degradation of critical habitats.</li> <li>viii. Activities including the construction of large and small dams as well as high-risk prone dams as per definition in ESS4 Annex 1.</li> <li>ix. Dams with the objective of water storage and irrigation schemes, including construction, upgrade, expansion, etc. thereof, including small dams with safety risk as per definition in ESS4 Annex 1.</li> <li>x. Activities that may require use/deployment of Military.</li> <li>xi. Activities in contravention of international conventions and treaties to which Malawi is a Party.</li> </ul>	Same timeframe as 1.1, thereafter implement throughout Project implementation.	National Government Committee Local Finance PIT
1.4	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <ul style="list-style-type: none"> <li>i. Incorporate the relevant aspects of the ESCP, including, inter alia, ESMF, ESMPs, RPF, RAPs, LRPs and SEP, the Labor Management Procedures, and code of conduct, into the E&amp;S specifications of the procurement documents and contracts with contractors and supervising firms.</li> </ul>	<ul style="list-style-type: none"> <li>I. As part of the preparation of procurement documents and respective contracts.</li> </ul>	National Government Committee Local Finance PIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>II. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&amp;S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association.</p>	<p>II. Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Association upon request.</p>	
1.5	<p><b>TECHNICAL ASSISTANCE</b> Carry out the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project ESMF, RPF and SEP in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	<p>Throughout Project implementation.</p>	<p>National Local Government Finance Committee PIT</p>
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b> Prepare and implement the Labor Management Procedures (LMP) for the Project as part of the ESMF including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, including Government workers, and applicable requirements for contractors, subcontractors, and supervising firms</p>	<p>Same timeframe as 1.1, and thereafter implement the LMP throughout Project implementation.</p>	<p>National Local Government Finance Committee PIT</p>
2.2	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) PLAN</b></p> <p>I. Require contractors and subcontractors to prepare and implement OHS Plans and risk assessments in line with the OHS framework in the ESMF and included in the ESMP, LMP or other site specific instruments, including but not limited to the safety reviews of the detailed designs, incorporating safety features into the detailed design, and health and safety awareness raising, including EHS guidelines in accordance with ESMP</p>	<p>I. Prepare the OHS Plans and incorporate them as part of the respective bidding documents for the respective subprojects prior to the carrying out of subprojects. Thereafter implement throughout project implementation.</p>	<p>National Local Government Finance Committee PIT</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>II. Site-specific risk assessments to be carried out and preventative action and mitigation measures to be developed and included in the Occupational Health and Safety Plans developed by the contractors, method statements or other necessary instruments. Method statements/safe systems of work are to be implemented by the contractors while undertaking the works.</p>	<p>II. Site specific Risk Assessments to be completed prior to commencement of work under the same timeframe as for the preparation and implementation of the method statements or other necessary instruments but before works commencement.</p>	
2.3	<p><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.</p>	<p>Establish and adopt grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.</p>	<p>National Local Government Finance Committee PIT</p>
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>WASTE MANAGEMENT AND HAZARDOUS SUBSTANCES MANAGEMENT PROCEDURES</b> Prepare and implement Waste and Hazardous Substances Management procedures, as part of the ESMF prepared for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS3.</p>	<p>Same timeframe as 1.1, and thereafter implement the procedures throughout Project implementation.</p>	<p>National Local Government Finance Committee PIT</p>
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> Incorporate resource efficiency and pollution prevention and management measures in the ESMF to be prepared under action 1.1 above, including proactive promotion of sustainable cookstoves.</p>	<p>Same timeframe as 1.1, and thereafter implement the ESMF throughout Project implementation.</p>	<p>National Local Government Finance Committee PIT</p>
<b>ESS 4: COMMUNITY HEALTH AND SAFETY.</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.1	<p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>Incorporate measures to manage traffic and road safety risks as required in the Traffic Management Framework in the ESMF, including inter alia consideration of the road worthiness of vehicles, and competence of vehicle operators, signage, pedestrian movement around construction sites and access roads to sites, line with the ESSs, the WB Environmental, Health and Safety Guidelines (EHSGs), a.to be prepared under action 1.1 above, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.</p>	Same timeframe as 1.1, and thereafter implement the TMP throughout Project implementation.	National Government Committee Local Finance PIT
4.2	<p><b>COMMUNITY HEALTH AND SAFETY</b></p> <p>I. Assess and manage specific risks and impacts to the community arising from Project activities including, inter alia, 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.</p> <p>II. All designs of public access facilities shall be signed off by a qualified engineer in the department of buildings, in line with national requirements and WBG General EHS guidelines on Life and Fire safety aspects.</p> <p>III. Develop and implement Life and Fire safety plan which includes emergency preparedness and response measures for public access buildings</p>	<p>I. Same timeframe as 1.1, and thereafter implement the measures throughout Project implementation.</p> <p>II. Same timeframe as 1.1</p> <p>III. Same timeframe as 1.2</p>	<p>National Government Committee Local Finance PIT</p> <p>National Government Committee Local Finance PIT</p> <p>National Government Committee Local Finance PIT</p>
4.3	<p><b>SEA AND SH RISKS</b></p> <p>Prepare and implement a SEA/SH Action Plan , to be included as an annex of the ESMF, and as part of the ESMPs to assess and manage the risks of SEA and SH. The action plan shall include awareness raising and capacity building including inter alia, gender equity, awareness raising and capacity building on GBV, SEA and SH</p>	Same timeframe as 1.1, and thereafter implement the SEA/SH plan throughout Project implementation.	National Government Committee Local Finance PIT
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<p><b>RESETTLEMENT FRAMEWORK</b></p> <p>Prepare and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.</p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		Prepare and disclose the RPF prior to disbursement under Component 1 and thereafter implement the RPF throughout Project implementation.	National Government Committee Local Finance PIT
5.2	Prepare and implement a Resettlement Action Plan (RAP) and/or a Livelihood Restoration Plan (LRP) as set out in the RPF and consistent with ESS5.	Prepare and implement the respective RP and/or LRP 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.	National Local Government Finance Committee PIT
5.3	<b>GRIEVANCE MECHANISM</b> Adopt and implement the Grievance Mechanism (GRM) described in the RPF and SEP.	GRM in place before RAP preparation and implemented throughout RAP implementation	National Local Government Finance Committee PIT
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<b>SCREENING FOR BIODIVERSITY RISKS AND IMPACTS</b> Screening for biodiversity and living natural resources risks shall be carried out for subproject activities as described in the Project ESMF, and appropriate measures to ensure compliance with ESS6 incorporated into the subproject ESMPs and tools. Where, impacts on critical habitat are identified, the project exclusion list shall be applied.	Compile Biodiversity Risk and Impacts assessments as part of ESMF and ESMPs (same timeline as 1.1 and 1.2) and implemented throughout the Project.	National Local Government Finance Committee PIT
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	<b>Not relevant to the project</b>		
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<b>CHANCE FINDS</b> Describe and implement the chance finds procedures, as part of the ESMF of the project and ESMPs of the sub-project.	Same timeframe as for 1.1 and 1.2 Implement the procedures throughout Project implementation.	National Local Government Finance Committee PIT
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
9.1	<b>Not relevant to the Project</b>		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN</b></p> <p>Prepare and implement a Stakeholder Engagement Plan (SEP), including Project Grievance Redress Mechanisms.</p> <p>Update 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.</p>	<p>I. Disclose the SEP by end of Appraisal, and thereafter implement throughout Project Implementation</p> <p>II. Same timeframe as for 1.1, and thereafter implement the SEP throughout Project implementation.</p>	National Local Government Finance Committee PIT
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <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>	Establish the grievance mechanism no later than 3 months after the Project Effective Date, and thereafter, and thereafter maintain and operate the mechanism throughout Project implementation.	National Local Government Finance Committee PIT
<b>INDICATORS FOR IMPLEMENTATION READINESS</b>			
<p>The following actions are indicators for implementation readiness:</p> <ul style="list-style-type: none"> <li>I. Establish and maintain a Project Implementation Team within the National Local Governance Finance Committee within the Ministry of Local Government, Unity and Culture including hiring or appointing of E&amp;S specialists ie one (1) Social Safeguards Specialist, one (1) Environmental Safeguards Specialist, and one (1) Occupational Health and Safety Specialist</li> <li>II. Preparation, consultation, adoption and disclosure of final versions of ESMF, RPF, and SEP</li> </ul>			