

ESWATINI ELECTRICITY COMPANY



Environmental and Social Commitment Plan (ESCP)

for the

Network Reinforcement and Assess Project (NRAP)

May 16, 2019

1. Eswatini Electricity Company (EEC) is planning to implement the Network Reinforcement and Assess Project (NRAP) (the **Project**), with the involvement of the Ministry of Natural Resources and Energy. The International Bank for Reconstruction and Development has agreed to provide financing for the Project.
2. EEC will implement material measures and actions so that the Project is implemented in accordance with the World Bank Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out a summary of the material measures and actions.
3. Where the ESCP refers to specific plans or other documents, whether they have already been prepared or are to be developed, the ESCP requires compliance with all provisions of such plans or other documents. In particular, the ESCP requires compliance with the provisions set out in the Environmental and Social Management Plan, Resettlement Policy Framework, Resettlement Action Plan, Stakeholder Management Plan and Labor Management Plan that have been developed for the Project.
4. The table below summarizes the material measures and actions that are required as well as the timing of the material measures and actions. EEC 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 will be monitored and reported to the World Bank by EEC as required by the ESCP and the conditions of the legal agreement, and the World Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the World Bank and EEC, 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, EEC will agree to the changes with the World Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the World Bank and EEC. EEC will promptly disclose the updated ESCP. Depending on the project, the ESCP may also specify the funding necessary for completion of a measure or action.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, EEC shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, health, and safety impacts, labor influx, gender-based violence.

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ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)
May 2019**

| <i>Summary of the Material Measures and Actions to Mitigate the Project's Potential Environmental and Social Risks and Impacts</i> | <i>Timeframe</i> | <i>Responsibility / Authority and Resources/Funding Committed</i> | <i>Date of Completion</i> |
|--|---|--|--------------------------------------|
| ESCP Monitoring and Reporting | | | |
| <p>REGULAR REPORTING: Prepare and submit regular monitoring reports on the implementation of the ESCP.</p> | <p><i>Quarterly throughout project implementation. Report to EEC management, the Eswatini Environment Authority (EEA) and to the World Bank (WB).</i></p> | <p><i>EEC Environmental and Social Officer</i></p> <p><i>Funding from project budget</i></p> | <p>Throughout the project cycle.</p> |
| <p>INCIDENTS AND ACCIDENTS NOTIFICATION: Promptly notify any incident or accident related or having an impact on the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers [including] [specify relevant risks based on the environmental and social assessment]. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken to address it, and include information provided by any contractor and supervising entity, as appropriate.</p> | <p><i>Within 72 hrs. of an incident or accident has occurred in accordance with the EEC incident reporting and investigation procedure (which classifies types of incidents and gives time frames of reporting according to incident class) and in line with the World Bank's Environment and Social Incidence Response Toolkit (ESIRT)</i></p> | <p>EEC Safety, Health and Environment Officers, project manager</p> <p>Funding from project budget</p> | <p>Throughout the project cycle.</p> |

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| SUMMARY ASSESSMENT | | | | |
| ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS | | | | |
| 1.1 | <p>ORGANIZATIONAL STRUCTURE: Establish a dedicated environment and social team to oversee the implementation of the environmental and social aspects of the project. EEC already has two officers responsible for environmental management.</p> <ul style="list-style-type: none"> A social officer will be recruited for the project. In addition, community liaison officers for all chiefdoms will be engaged. | <p><i>Immediately</i></p> <p><i>Social officer (end of June 2019)</i> <i>Community Liaison Officer (end of June 2019)</i></p> | EEC | To be maintained throughout project implementation. |
| 1.2 | ENVIRONMENTAL AND SOCIAL ASSESSMENT: | | | |
| 1.2.1 | <p>A preliminary ESIA has been prepared</p> <ul style="list-style-type: none"> A detailed, site-specific Environmental and Social Impact Assessment (ESIA) will be undertaken. An associated Environmental and Social Management Plan (ESMP) at the feasibility studies and detailed design stage will be developed. | <p><i>5 months from 31 July, 2019</i></p> | <p>EEC</p> <p>Funding from project budget</p> | 31 December, 2019 |
| 1.2.2 | Draft Feasibility Study shall be prepared and shared with ESIA Team to facilitate analysis of alternatives and E&S recommendations for detailed designs. | <p><i>31 July, 2019</i></p> | <p>EEC</p> <p>Funding from project budget</p> | 31 July, 2019 |
| 1.2.3 | Draft Design study reports shall be prepared and shared with E&S team to revise/update the ESMP and ensure relevant E&S clauses are included in Bid documents | <p><i>December 31, 2019.</i></p> | EEC | 31 December, 2019 |
| 1.3 | MANAGEMENT TOOLS AND INSTRUMENTS: | | | |

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| 1.3.1 | <ul style="list-style-type: none"> • Develop and disclose Environmental and Social Management Plan (ESMP) together with the ESIA. • Develop and disclose an ESMF for the distribution and electricity access sub-components. • EEC will draft a project implementation manual (or procedures manual) with the environmental and social standards' section describing in detail: <ul style="list-style-type: none"> ○ The procurement expert's role in preparing the ToRs, tender documents and contracts, ○ The role of an environmental specialist and social specialists in preparing the environmental and social standard's sections to be included in the ToRs, tender documents and works contracts, ○ The minimum environmental and social clauses to be included in the ToRs and tender documents (including codes of conduct, coordination, reporting and monitoring, and grievance redress mechanisms), ○ Incorporate environmental and social indicators into the monitoring and evaluation system ○ Completion timeframes | <p><i>5 months from July 31, 2019</i></p> <p><i>Prior to commencement of construction works</i></p> | <p>EEC</p> <p>Funding from project budget</p> | <p>31 December, 2019</p> <p>To be implemented throughout project implementation</p> |
| 1.3.2 | <p>Develop and disclose associated policy frameworks and management plans:</p> <ul style="list-style-type: none"> • Draft Resettlement Policy Framework (Disclosed: In-country May 03, Bank – May 02) and Stakeholder Engagement Plan (SEP) have been developed. | <p><i>Drafts Prepared and Disclosed on EEC website on April 23</i></p> | <p>EEC</p> <p>Funding from project budget</p> | <p>08 May, 2019</p> <p>Implementation of management tools and instruments required</p> |

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| | <ul style="list-style-type: none"> Preliminary Environmental and Social Impact assessment has been developed (Disclosed: In country May 03, Bank – May 02). Draft Labor Management Procedures has been developed. (Disclosed: In-country - May 03, Bank – May 02) Draft Stakeholder Engagement Plan incl. Grievance Mechanism has been developed (Disclosed: In-country May 03, Bank – May 01). | <i>and May 03 and Bank website on May 02</i> | | throughout project implementation. |
| 1.3.3 | Update existing EEC environmental, health and safety monitoring and reporting mechanisms to align with project and ESMP | <i>Prior to project construction works</i> | EEC Funding from project budget | 31 December, 2019 Implementation of monitoring and reporting mechanisms will be throughout project implementation. |
| 1.3.4 | Develop Project Occupational Health & Safety Guidelines; (including GBV risk assessment) in alignment with World Bank requirements and EEC OH&S procedures in place. | <i>Prior to project construction works</i> | EEC Funding from project budget | 31 October 2019 Implementation of guidelines will be throughout project. |
| 1.3.5 | <ul style="list-style-type: none"> Appoint a Social Standards Officer for the project Additionally, EEC will engage community liaison officers in each chiefdom | <i>End of June (Social Standards Officer)</i> <i>Community Liaison Officer (end of June 2019)</i> | EEC Funding from project budget | End of June 2019 End of July 2019 |
| 1.3.6 | Report on the project's compliance to Environmental legislation and World Bank requirements | <i>Quarterly</i> | EEC | To be applied throughout the project implementation. |

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| | | | Funding from project budget | |
| 1.4 | MANAGEMENT OF CONTRACTORS: | | | |
| 1.4.1 | Develop and disclose ToRs for Construction Contractors who must implement and comply with ESMP. These must include: <ul style="list-style-type: none"> Request for Contractor Safety Health Environment (SHE) files. | <i>Prior to project construction</i> | EEC Funding from project budget | 01 February, 2020 |
| 1.4.2 | Appoint Construction Contractor and develop contract, which must highlight: <ul style="list-style-type: none"> Code of ethics and respective behavior Labor and working conditions Security of sites | <i>Prior to project construction</i> | EEC | 01 February, 2020 To be applied throughout the project implementation. |
| 1.4.2 | Develop and disclose a Labor Management Plan, which must highlight: <ul style="list-style-type: none"> Community and worker's awareness raising and training on prevention of HIV/AIDS Specialized NGOs present in the country will be engaged by EEC to increase sensitization among communities on GBV, SEA and other health issues. | <i>Completed. To be updated as required based on detailed designs.</i> | EEC Funding from project budget | 31 December, 2019 To be updated and applied throughout the project implementation. |
| 1.4.3 | Develop and disclose a project Occupational Health and Safety (OHS) plans in alignment with World Bank requirements, the Occupational Safety and Health Act, 2001 and EEC OHS guidelines. | <i>Prior to project construction works</i> | EEC Funding from project budget | 31 January, 2020 |
| 1.4.4 | Develop and disclose a grievance/ feedback management process for labors in-case of unfair treatment and poor working conditions | <i>Prior to project construction works. Within one month of</i> | EEC Funding from project budget | End of February 2020 |

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| | | <i>Mobilization of contractors</i> | | Processes are to be applied throughout the project implementation. |
| 1.4.5 | Improve on existing occupational health and safety mechanisms (that is, emergency preparedness plans, non-conformance reporting, hazards identification and risk assessment processes, etc.) to align with project ESIA findings and World Bank requirements. | <i>Prior to project effectiveness</i> | EEC Funding from project budget | 31 December, 2019 Mechanisms are to be applied throughout the project implementation. |
| 1.5 | PERMIT, CONSENTS AND AUTHORIZATIONS: | | | |
| 1.5.1 | Obtain project approval from EEA following submission of ESIA report and associated documents/ frameworks by consulting firm. | <i>Prior to project construction works.</i> | EEC Environment Unit/ Appointed consulting firm | November 2019 |
| 1.5.2 | Obtain way leave rights and consent from project affected participants | <i>Prior to project implementation. These will be identified during surveying exercise and during implementation of RAP</i> | EEC Surveying team and Social Standards Officer | To be maintained throughout project implementation. |
| 1.5.3 | Identify site for a borrow pit and obtain borrow pit permit for construction activities | <i>Prior to project construction works.</i> | Appointed Construction Contractor | To be maintained throughout project implementation. |

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| 1.5.4 | Attain Environmental Compliance Certificate (ECC) from the EEA. | <i>After project completion, following submission of Project compliance reports</i> | EEC | After project completion and submission of project compliance reports |
| 1.6 | THIRD PARTY MONITORING: | | | |
| 1.6.1 | Appointed Owner's engineer to have E&S officials who must monitor and ensure the effective implementation of the ESMP and other mitigation plans. (Appointed officer will work closely with EEC internal staff). | <i>Prior to project construction</i> | Appointed Owner's Engineer along with PIU E&S officials Funding from project budget | August 2019 To be maintained throughout the project design preparation and implementation. |
| 1.6.2 | Request expression of interest for RAP implementation audit. | <i>Prior to project construction</i> | EEC Social Standards Officer Funding from project budget | At the completion of 90% of disbursement of entitlements as per RAP. |
| ESS 2: LABOR AND WORKING CONDITIONS | | | | |
| 2.1 | LABOR MANAGEMENT PROCEDURES: | | | |
| 2.1.1 | Develop and disclose ToRs for Construction Contractors who must implement and comply with ESMP. These must include: <ul style="list-style-type: none"> Request for Contractor Safety Health Environment (SHE) files. | <i>Prior to project construction works.</i> | EEC Funding from project budget | 01 December, 2019 ToRs will be applicable throughout the project implementation. |
| 2.1.2 | Appoint Construction Contractor and develop contract, which must highlight: <ul style="list-style-type: none"> Code of ethics and respective behavior Labor and working conditions Security of sites | <i>Prior to project construction works.</i> | EEC Funding from project budget | 01 February, 2020 To be applicable throughout the project implementation. |

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| 2.1.4 | Develop and disclose Occupational Health and Safety (OHS) plans in alignment with World Bank requirements, the Eswatini Occupational Safety and Health Act, 2001 and EEC OHS guidelines. | <i>Prior to project construction works.</i> | Appointed ESIA consulting firm EEC Funding from project budget | 31 December, 2019. To be applied throughout project implementation. |
| 2.1.5 | Improve on existing occupational health and safety mechanisms (that is, emergency preparedness plans, non-conformance reporting, hazards identification and risk assessment processes, etc.) to align with project ESIA findings and World Bank ESMF requirements. | <i>Prior to project construction works.</i> | EEC | 31 December, 2019 Mechanisms to be applied throughout project implementation. |
| 2.2 | GRIEVANCE MECHANISM FOR PROJECT WORKERS: | | | |
| 2.2.1 | <ul style="list-style-type: none"> • Develop and disclose an accessible grievance/ feedback management process for project workers. • A separate GRM for workers is in the draft LMP. | <i>Prior to construction and updated when necessary during project implementation</i> | Appointed ESIA consulting firm/ Project Steering Committee, EEC, contractors Funding from project budget | To be maintained throughout project implementation. |
| 2.3 | OHS MEASURES: | | | |
| 2.3.1 | Develop and disclose Occupational Health and Safety (OHS) plans in alignment with World Bank requirements, the Eswatini Occupational Safety and Health Act, 2001 and EEC OHS guidelines. | <i>Prior to project construction works.</i> | Appointed ESIA consulting firm EEC | 31 December, 2019 |

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| | | | | Mechanisms to be applied throughout project implementation. |
| 2.3.2 | Improve on existing occupational health and safety mechanisms (that is, emergency preparedness plans, non-conformance reporting, hazards identification and risk assessment processes, etc.) to align with project ESIA findings and World Bank ESMF requirements. | <i>Prior to project construction works.</i> | EEC Funding from project budget | 31 December, 2019 Mechanisms to be applied throughout project implementation |
| 2.4 | EMERGENCY PREPAREDNESS AND RESPONSE: | | | |
| 2.4.1 | Improve on existing occupational health and safety as well as environmental emergency preparedness and response plans to align with project ESIA findings and World Bank ESMF requirements. | <i>Prior to project construction works.</i> | EEC Funding from project budget | 31 December, 2019 Mechanisms to be applied throughout project implementation |
| 2.5 | PROJECT WORKERS TRAINING: | | | |
| 2.5.1 | Conduct a study and develop as well as disclose an Institutional Capacity Strengthening Plan. EEC and project contractors to design and organize training for workers to increase awareness of on social and environmental risks, code of conduct and mitigation measures. | <i>Prior to project construction works.</i> | Appointed ESIA consulting firm EEC, project contractors Funding from contractors' budget | To be applied throughout the project implementation. |
| ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT | | | | |
| 3.1 | MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS: | | | |

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| 3.1.1 | Request for contractor's SHE management file, which has detailed ESMP measures that include waste and rehabilitation management plans. | <i>Prior to project construction works.</i> | Project Steering Committee | 01 February, 2020 |
| 3.1.2 | Induct contractors on EEC's and international best practice waste management procedures which entail avoiding, reducing and recycling as well as waste segregation. | <i>During project kickoff/handover to contractor.</i> | EEC SHERQ Department | 01 February, 2020 |
| ESS 4: COMMUNITY HEALTH AND SAFETY | | | | |
| 4.1 | TRAFFIC AND ROAD SAFETY: | | | |
| 4.1.1 | Use ESIA findings on traffic risks, especially since the project route is close to a main road, to develop measures to prevent and mitigate risks. | <i>5 months from July 31, 2019 (i.e. post finalization with E&S consulting firm)</i> | Appointed consulting firm EEC | 31 December, 2019 |
| 4.1.2 | Induct contractors on EEC's transport and road safety measures | <i>During project kickoff/handover to contractor</i> | EEC SHERQ Department | 01 February, 2020 |
| 4.2 | COMMUNITY HEALTH AND SAFETY: | | | |
| 4.2.1 | Ensure Construction Contractor contract underpin: <ul style="list-style-type: none"> • Code of ethics and respective behavior • Labor and working conditions • Security of sites | <i>Prior to project construction works</i> | Project Steering Committee | 01 February, 2020 |
| | <ul style="list-style-type: none"> • Introduce contractors to affected project areas through a community meeting | <i>During project kickoff/handover to contractor</i> | Project Steering Committee | 01 February, 2020 |

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| | <ul style="list-style-type: none"> • EEC will ensure that project contractors assess, develop and implement measures and actions to manage specific risks and impacts to community emanating from project activities and workers. | | Funding from project budget | and continue throughout project implementation |
| 4.2.2 | Request for contractor's SHE management file, which has detailed ESMP measures that focus on baseline and task specific Hazard Identification and Risk Assessment (HIRA) processes. | <i>Prior to project construction works</i> | Project Steering Committee | 01 February, 2020 |
| 4.3 | GBV AND SEA RISKS: | | | |
| 4.3.1 | <p>Finalize Training and awareness program on prevention of HIV/AIDS and Gender based violence</p> <ul style="list-style-type: none"> - Frequency of training and who will be training <p>A draft LMP has been developed. It is to be revised when additional information becomes available.</p> <ul style="list-style-type: none"> • | <i>Prior to project construction works and updated when necessary during project implementation</i> | <p>Specialized Agency engaged</p> <p>EEC</p> <p>Funding from project budget</p> | <p>31 January, 2020</p> <p>To be applied throughout project implementation.</p> |
| 4.4 | GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION: | | | |
| 4.4.1 | <p>A GBV risk assessment was undertaken using the Bank's GBV risk rating tool prior to project appraisal.</p> <ul style="list-style-type: none"> • To manage SEA and GBV risks, measures will be developed as part of the <i>ESMP and maintained throughout project implementation.</i> • Engage qualified institutions (e.g. NGOs, Government Hospitals etc.), to give Tool box talks on GBV ad SEA risks continuous training and awareness | <i>Prior to project construction works and during project implementation</i> | <p>EEC</p> <p>Construction Contractor</p> <p>GBV service providers</p> <p>Funding from project budget</p> | To be maintained throughout project implementation. |

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| 4.4.2 | Develop and train the community and workers on a grievance/ feedback management process for reporting cases on GBV and SEA | <i>Prior to construction</i> | EEC and specialized agency engaged by EEC | To be maintained throughout project implementation. |
| 4.5 | EMERGENCY RESPONSE MEASURES: | | | |
| 4.5.1 | Improve on existing occupational health and safety as well as environmental emergency preparedness and response plans to align with project ESIA findings and World Bank ESMF requirements. | <i>Prior to project construction works</i> | EEC Environment & Safety department | 31 December, 2019 Throughout project implementation |
| 4.5.2 | Induct contractors and communities on Emergency Preparedness and Response Plan. | <i>During project kickoff/ handover to contractor</i> | EEC SHERQ Department | 01 February, 2020 |
| 4.6 | SECURITY PERSONNEL: | | | |
| 4.6.1 | Security measures will be highlighted in the ESMP Note: If construction works are carried out on land owned by EEC, the contractor will use EEC's existing security system. | <i>Prior to project construction works</i> | Appointed consulting firm Funding from project budget | 01 February, 2020 Throughout project implementation |
| 4.6.2 | Request for contractor's SHE management file, which has detailed ESMP measures that focus on security systems. | <i>Prior to project construction works</i> | Project Steering Committee | 01 February, 2020 |

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| 4.7 | TRAINING FOR THE COMMUNITY: | | | |
| 4.7.1 | Induct contractors and train communities to increase awareness on the Project risks and measures to be adopted. | <i>During project kickoff/handover to contractor</i> | EEC SHERQ Department | 01 February, 2020 Throughout project implementation |
| 4.8 | COMMUNITY INVOLVEMENT: | | | |
| 4.8.1 | Draft Stakeholder Engagement Plan (SEP) has been developed and will focus on and underpin: <ul style="list-style-type: none"> • The hiring of local (unskilled) labor in order to minimize labor influx. • The engagement of a community liaison officer to facilitate harmonious relationship with community. (Preferably nominated by Tinkhundla). • Monitoring of environmental and social impacts and the effectiveness of designed mitigation measures. | <i>Draft SEP prior to appraisal</i> <i>Updated SEP Prior to project construction works</i> | Appointed consulting firm/EEC Funding from project budget | April 2019 01 December, 2019 |
| ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT | | | | |
| 5.1 | LAND ACQUISITION AND RESETTLEMENT: | | | |
| 5.1.1 | Implement land surveying for the project route to feed into ESIA and the development of subsequent plans. | <i>Prior to undertaking detailed ESIA/ESMP</i> | EEC Surveying Team | 31 July, 2019 |
| 5.1.2 | Draft Resettlement Policy Framework (RPF) prepared and disclosed | <i>Prior to appraisal by the World Bank</i> | EEC Funding from project budget | Completed |

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| 5.2 | RESETTLEMENT PLANS: | | | |
| 5.2.1 | <ul style="list-style-type: none"> Develop and disclose site-specific resettlement plans [RAPs] consistent with the requirements of the RPF, ESS5, national legislation and aligned with ESIA findings. | <i>Along with detailed designs.</i> | Appointed Consulting Firm Funding from project budget | November 2019 |
| 5.2.2 | <ul style="list-style-type: none"> Implement resettlement plans consistent with the ESIA findings including implementation budget. | <i>Prior to project construction works</i> | Appointed Consulting Firm, EEC Funding from project budget | June 2020 |
| 5.3 | MONITORING AND REPORTING: | | | |
| 5.3.1 | <ul style="list-style-type: none"> Ensure that monitoring and reporting on land acquisition and resettlement activities are conducted separately or as part of regular reporting. Undertake a close out audit of the RAPs and address any outstanding items before RAP closure | <i>Throughout Project implementation, as part of regular reporting.</i> <i>Prior to RAP closure</i> | Appointed Environmental & Social Standards Officer/ EEC Surveying Unit Funding from project budget | To be applied throughout the project implementation or up to all disbursements in line with the RAP. |
| 5.4 | GRIEVANCE MECHANISM: | | | |
| | <ul style="list-style-type: none"> Develop and implement the arrangements for the grievance mechanism for resettlement and will be established as part of the grievance mechanism under ESS10) The RAP will incorporate details on the GRM | <i>Indicate timing e.g. Prior to commencement of resettlement activities and maintained throughout project implementation.</i> | EEC Funding from project budget | To be maintained throughout project implementation |

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ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)
May 2019**

| <i>Summary of the Material Measures and Actions to Mitigate the Project's Potential Environmental and Social Risks and Impacts</i> | | <i>Timeframe</i> | <i>Responsibility / Authority and Resources/Funding Committed</i> | <i>Date of Completion</i> |
|--|--|---|---|---|
| | | <i>Regular reporting on outcomes of the GRM to be established</i> | | |
| 5.4.1 | Develop and disclose a grievance/ feedback management process for project affected people | <i>Upon finalized Resettlement Action Plan</i> | Appointed ESIA consulting firm/ EEC Surveying Unit | To be maintained throughout project implementation. |
| ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES | | | | |
| 6.1 | BIODIVERSITY RISKS AND IMPACTS: | | | |
| 6.1.1 | Develop and document in an ESIA/ ESMP measures and actions to assess and manage risks and impacts on biodiversity, including identification of bird migratory routes, critical habitats and species listed under the IUCN/ protected by Eswatini legislation. | <i>Prior to Project Implementation (as part of the ESIA)</i> | Appointed ESIA consulting firm/ EEC Surveying Unit | 31 December, 2019 |
| ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES | | | | |
| 7.1 | INDIGENOUS PEOPLES PRESENT OR COLLECTIVELY ATTACHED TO PROJECT AREA: This standard is not relevant currently as there are no distinct social and cultural groups have been identified in accordance with ESS7 and in the national context in the project area. | | | |
| ESS 8: CULTURAL HERITAGE | | | | |

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|--|---|---|---|--|
| 8.1 | CHANCE FINDS: | | | |
| 8.1.1 | The surveying and ESIA processes will identify any artefacts and report to the Eswatini National Trust Commission. Chance finds will be catered for in a 'Chance Finds' procedure that will detail what the construction contractors must do when they come across items of heritage significance. | <i>Prior to and maintained throughout construction.</i> | Appointed consulting firm/ EEC Surveying and Environment team | 31 December, 2019 And throughout project implementation |
| 8.2 | CULTURAL HERITAGE: | | | |
| 8.2.1 | Document measures to address risks and impacts on cultural heritage on ESMP | <i>Prior to project implementation</i> | Appointed consulting firm | 31 December, 2019 And throughout project implementation |

ESS 9: FINANCIAL INTERMEDIARIES

This standard is not relevant, as the project has no financial intermediaries.

ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

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|--|--|---|---|---|
| 10.1 | SEP PREPARATION: <ul style="list-style-type: none"> A Draft Stakeholder Engagement Plan developed and is to be disclosed. Update of detailed SEP | <i>Prior to project appraisal</i> | Project Steering Committee Appointed consulting firm, EEC Funding from project budget | April 2019 Amendments as required throughout project duration |
| 10.2 | SEP IMPLEMENTATION: | | | |
| 10.2.1 | <ul style="list-style-type: none"> Implement Stakeholder Engagement Plan | <i>Throughout Project implementation</i> | Project Steering Committee/ Appointed consulting firm/ EEC Funding from project budget | To be maintained throughout project implementation up to completion. |
| 10.2.2 | <ul style="list-style-type: none"> Organise stakeholder consultation on draft RPF, preliminary ESIA, SEP and LMP Based on feedback received revise ESIA and RPF and redisclose. Relevant sections of RPF, Detailed ESIA and other documents to be extracted and disclosed in various forms in Siswati and English | <i>29-30 April, 2019</i> <i>08 May, 2019</i> | EEC | Completed Dissemination of project information and consultations throughout project implementation up to completion. |
| 10.3 | PROJECT GRIEVANCE MECHANISM: | | | |

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|---|---|---|---|
| <ul style="list-style-type: none"> • GRM to be developed as outlined in the SEP and RPF • Develop, implement and disclose a grievance/ feedback management process • Awareness raising for potential PAPs and communities on the existence and processes for submitting grievances | <p><i>Prior to project implementation and maintained throughout project implementation. Regular reporting throughout project implementation</i></p> | <p>Appointed ESIA consulting firm/ Project Steering Committee/EEC Funding from project budget</p> | <p>31 December, 2019</p> <p>To be developed prior construction activities and maintained throughout project implementation.</p> |