



The World Bank

Accelerating Sustainable and Clean Energy Access Transformation Madagascar (P515164)

REPUBLIC OF MADAGASCAR

Ministry of Energy and Hydrocarbons

**Ministry of the Environment and Sustainable
Development**

ACCELERATING SUSTAINABLE AND CLEAN ENERGY ACCESS TRANSFORMATION IN MADAGASCAR

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Appraisal Version

March 26, 2026



ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Madagascar (the Borrower) will implement the Accelerating Transformation Project for Access to Sustainable and Clean Energy (the Project) in association with the Ministry of Economy and Finance (MEF), the Ministry of Energy and Hydrocarbons (MEH), the Ministry of Environment and Sustainable Development (MESD) , the Rural Electrification Development Agency (ADER), the Electricity Regulatory Agency (ARELEC), and the Jiro sy Rano Malagasy (JIRAMA), as indicated in the Financing Agreement (the Agreement). The International Development Association (the Association), acting as administrator/implementing agency of the trust fund, has agreed to provide financing for the Project, as indicated in the Agreement. .
2. The Borrower shall ensure that the Project is implemented in accordance with the Environmental and Social Standards (ESS) and the provisions of this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Agreement. Unless otherwise specified in this PEES, capitalized terms used herein have the meanings assigned to them in the Agreement.
3. Without prejudice to the foregoing provisions, this ESCP sets out the specific measures and actions that the Borrower will implement, including, where applicable, the timeframes for these actions and measures, the institutional framework, staffing levels, training, monitoring and reporting mechanisms, and the complaints management mechanism. The ESCP also defines the environmental and social instruments to be developed or implemented within the framework of the Project, to be subject to consultation, and to be made public, in accordance with the ESS, and in a manner deemed acceptable, in form and substance, by the Association. These environmental and social instruments may be revised from time to time with the prior written consent of the Association. As provided in the aforementioned Agreement, the Borrower shall ensure that sufficient funds are available to cover the costs of implementing the ESIP.
4. As agreed by the Association and the Borrower, this ESCP may be revised from time to time during the implementation of the Project, as needed, in a manner that takes into account the adaptive management of changes or unforeseen circumstances that may arise within the Project, or in response to a performance evaluation of the Project. In such situations, the Association and the Borrower agree to revise the ESCP accordingly, by means of an exchange of letters signed by the Association and the Borrower's Representative specified in the Agreement. The Borrower will publish the revised ESCP without delay.
5. The subsection “Indicators of Implementation Readiness” below identifies the actions and measures to be taken to assess the project’s implementation readiness in accordance with this PEES. However, all actions and measures outlined in this PEES must be implemented as indicated in the “Timeline/Deadlines” column below, whether or not they are listed in the subsection in question.



CONCRETE MEASURES AND ACTIONS		TIMELINE/DEADLINES	RESPONSIBLE ENTITY
CAPACITY BUILDING AND SUPPORT MECHANISMS¹			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain the Program Management Unit (PMU) coordinated by: the MEH and composed by the representative of each government agency (MEH, MEF, JIRAMA, ADER) with a qualified Environmental and Social Specialist to support the E&S risk management.</p>	<p>Hire the E&S Specialist no later than 30 days after the effective date</p> <p>Maintain the PMU and this position throughout the project implementation.</p>	MEH
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Develop and implement the capacity building plan:</p> <ul style="list-style-type: none"> training of stakeholders, communities, and project workers on stakeholder mapping and mobilization, specific aspects of environmental and social assessment, emergency preparedness and response, and community health and safety. 	<p>The plan must be ready three months after the effective date and implemented throughout the Project implementation.</p>	PMU
MONITORING AND REPORTING			
C	<p>REGULAR REPORTS</p> <p>Prepare and regularly submit to the Association reports monitoring the environmental, social, health and safety (ESHS) performance of the Project. The reports include:</p> <ul style="list-style-type: none"> The degree of preparation and implementation of the environmental and social instruments required under the PEES. Summary of stakeholder engagement activities conducted in accordance with the Stakeholder Engagement Plan. Complaints submitted to the complaints management mechanism(s), the complaints register and progress made in their resolution. The environmental, social, health and safety (ESHS) performance of suppliers/service providers and subcontractors as presented in the [monthly] reports of suppliers and service providers and prime contractors. Number and status of resolution of incidents and accidents reported under action E below. 	<p>Submit quarterly reports to the Association throughout the implementation of the project. Submit each report to the Association] no later than [15] days after the end of each period considered].</p>	PMU
D	MONTHLY REPORTS FROM SUPPLIERS AND SERVICE PROVIDERS		PMU



CONCRETE MEASURES AND ACTIONS		TIMELINE/DEADLINES	RESPONSIBLE ENTITY
	Require suppliers, service providers, and contractors to produce monthly monitoring reports on environmental, social, health, and safety (ESSS) performance based on the indicators specified in the relevant tender documents and contracts, and to submit these reports to the Association.	Communicate the monthly reports to the Association] [as annexes to the reports to be communicated under action C above].	
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Association of any incident or accident related to the Project that has or is likely to have serious consequences for the environment, affected communities, the public, or staff, including, but not limited to, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents resulting in death or serious injury to the public or staff; acts of violence, discrimination, or protest; unforeseen impacts on cultural heritage or biodiversity resources; environmental pollution; dam failures; forced labor or child labor; displacement without due process (forced evictions); allegations of sexual exploitation and abuse (SEA) or sexual harassment (SH); or epidemics. At the Association's request, provide any available details of the incident or accident.</p> <p>Arrange for a proper review of the incident or accident to determine its immediate, underlying, and root causes. Prepare, agree upon with the Association, and implement a corrective action plan that outlines 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 being informed of the incident or accident and no later than 24 hours after a case of SEA/SH. Provide available details upon request.</p> <p>Communicate the review report and corrective action plan to the Association no later than 10 days after the initial notification, unless the Association agrees to a different time limit in writing.</p>	PMU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACT			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <ol style="list-style-type: none"> 1. Prepare and implement E&S screening/assessment including SEA/SH risk assessment and mapping of service providers and integrate E&S mitigations measures in the Term of Reference (ToR) and contract documents while executing all the activities under the project including training and capacity building. 2. Incorporate the relevant aspects of the ESCP into the contract and ToRs. The consultants and contractors will abide by the Recipient's framework and abide by the Bank's ESHS specifications of their respective contracts. 3. Monitor and supervise implementation of E&S requirements. 	Throughout the implementation of the project.	PMU
1.2	<p>SUPPLIER AND SERVICE PROVIDER MANAGEMENT</p>	As part of the preparation of procurement documents and respective contracts.	PMU



CONCRETE MEASURES AND ACTIONS		TIMELINE/DEADLINES	RESPONSIBLE ENTITY
	<p>Incorporate the relevant aspects of the ESCP, including, inter alia, stakeholder engagement, GM, and SEA/SH risk prevention and mitigation 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.</p> <p>The provisions to be incorporated in the contract and procurement documents will be provided by the PMU, and concurred by the Bank.</p>	<p>Supervise consultants/contractors throughout Project implementation. Copies of relevant contracts provided to the Bank upon request.</p>	
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Conduct consultations, studies, capacity building, training, and any other technical assistance activities within the framework of the Project including, the preparation of environmental and social instruments or plans within the framework of technical assistance, in accordance with Terms of Reference acceptable to the Association and compliant with the ESS. Then, prepare and finalize the deliverables of these activities in accordance with the terms of reference.</p>	<p>Throughout the implementation of the Project.</p>	<p>PMU</p>
1.6	<p>USE OF THE BORROWER'S ENVIRONMENTAL AND SOCIAL FRAMEWORK</p> <p>Promptly notify the Bank of any changes to the Recipient's E&S Framework that may materially adversely affect the Recipient's ability to manage the E&S risks and impacts of the Project in line with the ESSs and immediate measures taken or that are planned to be taken to address said changes and the ensuing potential risks and impacts of the Project. If such changes adversely affect relevant E&S risk management aspects of the Project, the Recipient and the Bank shall agree to implement relevant measures and actions to address them.</p>		<p>PMU</p>
ESS 2: EMPLOYMENT AND WORKING CONDITIONS			
2.1	<p>WORKFORCE MANAGEMENT PROVISIONS</p> <p>Prepare, adopt, and implement Labor Management Procedures (LMP) consistent with ESS2, including for all categories of project workers, including PMU staff, consultants, Fund Managers, and trainers : fair and transparent recruitment and employment terms, nondiscrimination and equal opportunity, prohibition of child and forced labor, workers' rights to organize and collectively bargain and Occupational Health and Safety (OHS) measures. A grievance mechanism for project workers shall be established, maintained, and operated throughout project implementation. Incorporate the relevant provisions of the LMP into the Terms of Reference (ToRs) and contract documents for all contractors, consultants, and supervising firms engaged under the Project. The Borrower shall ensure that all contractors, subcontractors and service providers comply with these provisions through the inclusion of ESS2 requirements and Codes of Conduct in procurement documents and contracts. The Borrower shall monitor and report on labor and OHS performance, including any labor-related incidents or grievances, in accordance with the Bank's requirements.</p>	<p>Prepare the LMP before recruiting workers and then apply the LMP workforce management procedures throughout the project implementation</p>	<p>PMU</p>



CONCRETE MEASURES AND ACTIONS		TIMELINE/DEADLINES	RESPONSIBLE ENTITY
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</p> <p>Prepare and implement an Occupational Health and Safety (OHS) management plan to assess and manage the risks and impacts of the Project related to occupational health and safety, including risks arising from: (i) field-level activities conducted by MTF survey consultants in remote and rural areas; (ii) travel and transportation risks associated with site visits and field data collection; and (iii) any other activities that expose project workers to health or safety hazards. The OHS Management Plan shall include measures on incident prevention, emergency response, and reporting.</p> <p>Require consultants, contractors, suppliers and service providers to prepare and implement occupational health and safety management measures or plans consistent with the Plan and integrate OHS requirements into their respective contracts and ToRs</p>	Prepare the Occupational Health and Safety Management Plan before the start of project activities, then apply the plan throughout the project implementation.	PMU
2.3	<p>PROJECT WORKER COMPLAINT MANAGEMENT MECHANISM</p> <p>Establish and operationalize a grievance management mechanism for all project workers — including direct workers (PMU staff, CDMU–MEH personnel), contracted workers (consultants, Fund Managers, trainers, and technical assistance providers), and workers employed by contractors and subcontractors — as described in the Labor Management Procedures and in accordance with the provisions of ESS2. The mechanism shall be accessible, confidential, and free of charge, and shall allow for the submission of anonymous grievances. It shall be equipped to receive, record, and refer complaints related to SEA/SH in a survivor-centered, safe, and confidential manner. Publicize the mechanism among all project workers and ensure that its existence and procedures are communicated through continuous training beginning at the start of employment.</p>	Establish the Grievance Mechanism before recruiting workers for the Project, then maintain and operate it throughout the implementation of the Project.	PMU
ESS 3 : RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Manage the downstream environmental risks and impacts associated with the implementation of the activities in compliance with the ESS 3.</p>	Throughout the implementation of the project	PMU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.1 above.</p>	Same timeframe as for the preparation and implementation of the ESMP under action 1.1.	PMU
4.2	<p>COMMUNITY HEALTH AND SAFETY</p>		



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	Assess and manage specific risks and impacts to the community arising from Project activities such as behavior of Project workers, risks of labor influx, response to emergency situations, and include mitigation measures in the ESMP to be prepared as mentioned in action 1.1.	Same timeframe as for the preparation and implementation of the ESMP under action 1.1.	PMU
4.3	SEA AND SH RISKS Prepare and implement a SEA/SH Action Plan, to assess and manage the risks of SEA and SH.	The SEA/SH action plan will be developed, consulted, disclosed no later than three (3) months after the Effective Date and implemented throughout Project implementation.	PMU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
NOT RELEVANT			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
NOT RELEVANT			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
NOT RELEVANT			
ESS 8: CULTURAL HERITAGE			
NOT RELEVANT			
ESS 9: FINANCIAL INTERMEDIARIES			
NOT RELEVANT			
ESS 10 : STAKEHOLDER MOBILIZATION AND INFORMATION			
10.1	STAKEHOLDER ENGAGEMENT PLAN Prepare and implement a Stakeholder Engagement Plan (SEP) for the Project, in accordance with the provisions of NES 10. The SEP shall: (i) identify and map all relevant stakeholders, including project-affected parties and other interested parties such as communities targeted by Subcomponent 2 (skills-to-jobs program), rural and peri-urban populations in areas of DRE deployment, female-headed households, and institutional actors including MEH, JIRAMA, ADER, ARELEC, MEF, and MESDD; (ii) include measures to provide stakeholders with timely, relevant, understandable and accessible information on the Project, its activities, expected benefits, and potential risks; (iii) describe how consultations will be conducted in a manner that is free of manipulation, interference, coercion, discrimination, or intimidation, and that is respectful of local culture and context; and (iv) include measures to ensure meaningful participation of vulnerable groups, including women and youth, consistent with the Project's gender-responsive participation targets. Update and apply the SEP throughout the Project lifecycle as the scope of activities	Prepare the SEP before the start of project implementation and then apply the SEP throughout project implementation.	PMU



CONCRETE MEASURES AND ACTIONS		TIMELINE/DEADLINES	RESPONSIBLE ENTITY
	evolves. Submit summary reports of SEP implementation activities to the Association as part of regular quarterly monitoring reports.		
10.2	<p>PROJECT-LEVEL COMPLAINT HANDLING MECHANISM</p> <p>Establish, publicize, maintain and operate an accessible grievance management mechanism to receive and facilitate the resolution of complaints and grievances related to the Project in a timely, efficient, transparent, culturally appropriate and easily accessible manner to all parties affected and other interested stakeholders related to the Project by the Project, free of charge and without remuneration, including complaints and grievances submitted anonymously, in accordance with NES No. ¹⁰.</p> <p>The mechanism shall allow for the submission of anonymous complaints and be made known to all affected communities and stakeholders through the SEP.</p> <p>Document all complaints received and their resolution and include a summary in the regular monitoring reports submitted to the Association.</p> <p>The grievance mechanism is equipped to receive, record complaints concerning EAS/HS and facilitate their resolution, by referring survivors to competent providers of gender-based violence, in complete safety, confidentiality and in a survivor-centered manner.</p>	Establish the grievance mechanism no later than 3 months after the E&S Specialist takes up their post, then maintain and utilize this mechanism throughout the implementation of the project.	PMU
INDICATORS OF READINESS FOR IMPLEMENTATION			
<p>The following actions are indicators of the state of readiness for implementation:</p> <ul style="list-style-type: none"> • Availability of the E&S Specialist • Capacity building plan development • Preparation of the ToRs • C. Preparation of the LMP • D. Establishment of the Grievance mechanism • 2.1 Preparation and disclosure of the SEP 			