

**Government of the Republic of North
Macedonia**

**Additional Financing to the Primary Education
Improvement Project (P171973)**

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

Negotiated Draft

June 2, 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of North Macedonia (the Borrower) is implementing the Primary Education Improvement Project (the Project)(P171973), through the Ministry of Education and Science (MoES), as set out in the Original Loan Agreement (IBRD-91820-001). This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for the Project referred to above.
2. The 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 Bank. The ESCP is a part of the Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. 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 Bank. Said E&S documents may be revised from time to time with prior written agreement by the Bank. As provided for under the referred Agreement[s], the Borrower shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Bank 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 Bank and the Borrower agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Borrower Representative specified in the Agreement or specified in the Agreement[s]. The Borrower 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 |
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| IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT¹ | | | |
| A | <p>ORGANIZATIONAL STRUCTURE</p> <p>Maintain the existing Project Management Unit (PMU) under MoES with qualified staff and resources to support management of E&S risks related to minor refurbishment, including Social Specialist and one Environmental Specialist.</p> | Maintain the PMU staffing and structure throughout Project Implementation | PMU, MoES |
| B | <p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement the following capacity building measures:</p> <ul style="list-style-type: none"> • ESS1: Environmental and Social due diligence • ESS2: Labor and working conditions • Stakeholder identification and engagement • Content of the Environmental and Social Commitment Plan (ESCP) • Content of the Stakeholder Engagement Plan (SEP) <p>Grievance Mechanism Module, design and develop a training module to address the following aspects:</p> <ul style="list-style-type: none"> • Registration and processing procedure • Grievance redress procedure • Documenting and processing grievances • Use of the procedure by different stakeholders | Throughout Project Implementation | PMU, MoES |
| MONITORING AND REPORTING | | | |
| C | <p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include:</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 | Semi-annual reporting during the Project implementation on conjunction with the Project's progress reports. | PMU, MoES |

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).

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| | <p>resolving them.</p> <ul style="list-style-type: none"> E&S performance of contractors and subcontractors as reported through [monthly] contractors' and supervision firms' reports. | | |
| D | Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Bank | Submit the monthly reports to the Bank upon request OR as annexes to the reports to be submitted under action C above. | PMU, MoES |
| E | <p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Bank of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Bank upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence</p> | <p>Notify the Bank no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Bank no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.</p> | PMU, MoES |
| ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS | | | |
| 1.1 | <p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <p>1.1a Develop and implement site-specific ESMP checklists for each sub-project related to small construction works/adaptations, in accordance with the ESMP Checklist template adopted for the parent project, in a manner acceptable to the Bank.</p> <p>1.1b Develop and implement site-specific ESMPs for each sub-project related to construction of building extensions of up to 6 classroom, in accordance with the ESMP template prepared and adopted, in a manner acceptable to the Bank.</p> | Site-specific ESMP checklists and ESMPs are prepared prior to finalization of relevant bidding documents and implemented throughout Project implementation | PMU, MoES |
| 1.2 | TECHNICAL ASSISTANCE | Throughout Project implementation. | |

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| | Prepare TORs for the studies, plans, and strategies, in a manner that ensures that relevant environmental and social issues are considered in conducting the studies and are consistent with the ESF. | | PMU, MoES |
| ESS 2: LABOR AND WORKING CONDITIONS | | | |
| 2.1 | LABOR MANAGEMENT PROCEDURES Use maintain and implement, throughout Project implementation, labor management procedures, prepared for the parent project, incorporated in the POM, consistent with national legislation and ESS2, and ensure they are available to Project workers ² and all sub-contractors engaged. The Labor management procedures (LMP), incorporated in the POM, shall address all issues identified in ESS2, including the applicable requirements regarding non-discrimination and equal opportunity. | Update the LMP procedures in the POM no later than a month from negotiation of the AF and thereafter implement the procedures throughout Project implementation | PMU, MoES |
| 2.2 | OCCUPATIONAL HEALTH AND SAFETY MEASURES Develop and implement occupational health and safety measures (OHS), including emergency preparedness and response measures, and measures advised by WHO as COVID-19 response and prevention | Contractual obligation. Maintained throughout Project implementation. OHS measures should be finalized before commencement of IPF activities at any of the sites. LMP section of the POM to be applied throughout Project implementation | Pmu, MoES |
| 2.3 | GRIEVANCE MECHANISM FOR PROJECT WORKERS Maintain and operate a grievance mechanism for any Project-related labor and employment matters, easily accessible and promptly disclosed to Project workers, in line with ESS2 and labor laws in North Macedonia | Grievance mechanism operational prior to engaging Project workers and contractors, and maintained throughout Project implementation. Information about grievance mechanism is disseminated to Project workers prior to start of works. | |
| ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT | | | |
| 3.1 | Incorporate resource efficiency, pollution prevention and site-specific waste management | Prior to tendering physical works | |

²The term “project worker” refers to: (a) people employed or engaged directly by the Borrower (including the project proponent and the project implementing agencies) to work specifically in relation to the project (direct workers); people employed or engaged through third parties to perform work related to core functions of the project, regardless of location (contracted workers); (c) people employed or engaged by the Borrower’s primary suppliers (primary supply workers); and (d) people employed or engaged in providing community labor (community workers). ESS2 applies to project workers including fulltime, part-time, temporary, seasonal and migrant workers.

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| | measures will be covered under subproject specific ESMPs and ESMP checklists prepared under action 1.1 above. | for each subproject. Implementation throughout project duration | PMU, MoES |
| ESS 4: COMMUNITY HEALTH AND SAFETY | | | |
| 4.1 | <p>COMMUNITY HEALTH AND SAFETY</p> <p>Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities and include these measures in the ESMPs and ESMP checklists to be prepared in accordance with the ESMF, in a manner acceptable to the Bank.</p> <p>Within the scope of ESMP checklists and ESMPs, refer and incorporate relevant provisions of WBG EHSGs, GIIPs and good laboratory practices, including the emergency preparedness and response.</p> | Prior to tendering physical works for each subproject. Implementation throughout project duration | PMU, MoES |
| ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE | | | |
| 10.1 | <p>STAKEHOLDER ENGAGEMENT PLAN</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. The SEP may be amended and updated (and redisclosed) as needed during Project implementation</p> | Throughout Project Implementation | PMU, MoES |
| 10.2 | <p>PROJECT GRIEVANCE MECHANISM</p> <p>A grievance mechanism is established for the parent Project. The AF will use the same GM as for the parent Project.</p> <p>The SEP includes a commitment to communicate to stakeholders through the grievance mechanism to ensure that affected stakeholders are aware of its existence and familiar with the process for submitting grievances to such grievance mechanism.</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> | <p>Shall be maintained throughout Project implementation.</p> <p>Maintenance of grievance database. Report the summary of grievances annually.</p> <p>The GM will deal with SEA and SH complains as well.</p> | PMU, MoES |
| 10.3 | <p>SEP REPORTING</p> <p>Include results of the stakeholder engagement process in project monitoring reports as indicated in the SEP</p> | As part of regular project implementation progress report. | PU, MoES |
| INDICATORS FOR IMPLEMENTATION READINESS | | | |
| The following actions are indicators for implementation readiness: | | | |

Confirming of in-house staff to support the management of environmental and social risks of the Program and Project