

GOVERNMENT OF THE REPUBLIC OF ZAMBIA

ZESCO LIMITED

ZAMBIA - MALAWI INTERCONNECTOR PROJECT (ZAMA)

P515018

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Negotiated

June 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of the Republic of Zambia (the Recipient) will implement the Zambia - Malawi 400 kV Interconnector Project (ZAMA) (the Project), with the involvement of ZESCO Limited, as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the Financing 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 Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Financing 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, the timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social documents that shall be prepared, updated, consulted upon, disclosed, adopted, and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. The environmental and social documents may be revised from time to time with prior written agreement of the Association. As provided for under the referred Financing 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 may be revised from time to time during Project implementation to reflect adaptive management of Project changes, unforeseen circumstances, or Project performance. In such circumstances, the Recipient and the Association agree to update the ESCP through an exchange of letters signed between the Association and the Recipient's Representative specified in the Financing Agreement. The Recipient through ZESCO shall promptly disclose the updated ESCP.
5. The subsection on 'Indicators for Implementation Readiness' identifies selected actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. All actions and measures in this ESCP shall be implemented as set out in the Timeframe column irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
1. IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT		
A. ORGANIZATIONAL STRUCTURE		
<p>(1) Establish and maintain a Project Implementation Unit (PIU) with qualified staff and resources to support management of the environmental, social, health and safety (ESHS) risks and impacts of the Project. The PIU shall include, at a minimum: one Environmental Specialist, one Social Specialist, one Occupational Health and Safety (OHS) Specialist, one Gender Based Violence (GBV) Specialist and one Wayleave Officer.</p>	<p>(1) Appoint an Environmental Specialist, Social Specialist, OHS Specialist, GBV Specialist and Wayleave Officer to be in place no later than two months after Project effectiveness and maintained throughout Project implementation.</p>	<p>ZESCO Limited</p>
<p>(2) Require the Owner’s Engineer/Supervising Engineer and all civil works contractors to mobilize suitably qualified ESHS staff, including environmental, social, OHS, community liaison, GBV, and biodiversity expertise proportionate to the scope of works.</p>	<p>(2) Supervising Engineer and contractor ESHS staff to be in place before commencement of relevant works and maintained throughout contract implementation.</p>	
B. CAPACITY BUILDING PLAN/MEASURES		
<p>Prepare and implement a capacity building plan for PIU staff, contractors, supervising engineers, local authorities, community grievance committees, and other relevant stakeholders. Training shall cover, as relevant: Environmental and Social Framework (ESF) and ESS requirements; ESCP implementation; Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP) implementation; Contractor Environmental and Social Management Plan (C-ESMP) review and supervision; OHS and emergency preparedness; work at height and electrical safety; traffic and road safety; labour management and worker Grievance Redress Mechanism (GRM); GBV, Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) prevention and response; code of conduct; incident reporting and root cause analysis; biodiversity management; chance finds; stakeholder engagement and grievance management; Resettlement Action Plan (RAP) implementation and livelihood restoration.</p>	<p>Capacity building plan to be prepared within 60 days after Project effectiveness. Training to commence within 90 days after Project effectiveness and continue throughout Project implementation, with refresher training at least annually and more frequently where required by risk or performance.</p>	<p>ZESCO Limited, with support from Supervising Engineer and contractors</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
2. MONITORING AND REPORTING		
<p>C. REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the ESHS performance of the Project. Reports shall include, at minimum: status of ESCP implementation; implementation of ESIA/ESMP, RAP, Stakeholder Engagement Plan (SEP), Labour Management Procedure (LMP) and GBV/SEA/SH measures; contractor and subcontractor ESHS performance; status of C-ESMPs and site-specific plans; stakeholder engagement activities; grievance mechanism data, including GBV/SEA/SH-sensitive reporting in anonymized form; incidents and accidents; OHS statistics; RAP implementation and livelihood restoration progress; biodiversity monitoring; corrective actions and close-out status.</p>	<p>Submit quarterly reports to the Association throughout Project implementation, commencing not later than 45 days after the end of the first full quarter after Project effectiveness.</p>	<p>ZESCO Limited</p>
<p>D. CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms to prepare and submit monthly ESHS performance reports in accordance with the metrics specified in the bidding documents, contracts, ESMP, LMP, RAP, GBV/SEA/SH Action Plan, and C-ESMPs. ZESCO shall review such reports and include summaries and key issues as annexes to the quarterly reports submitted to the Association.</p>	<p>Monthly reports to be submitted by contractors and supervising firms to ZESCO and the Supervising Engineer throughout contract implementation. Summaries to be included in the quarterly reports under Action C.</p>	<p>ZESCO Limited, Supervising Engineer, and contractors</p>
<p>E. INCIDENTS AND ACCIDENTS</p> <p>a. Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, affected communities, the public, or workers. Such incidents include, inter alia, fatalities; lost time injuries; major traffic accidents; serious security incidents; acts of violence or protest; forced or child labour; forced eviction or displacement without due process; major pollution or hazardous material spills; significant biodiversity or cultural heritage impacts; disease outbreaks; and allegations of GBV/SEA/SH.</p>	<p>a. Notify the Association no later than 48 hours after learning of the incident or accident, and within 24 hours for any fatality or GBV/SEA/SH allegation.</p>	<p>ZESCO Limited</p>
<p>b. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or planned to address it, and any information provided by contractors and supervising firms, as appropriate.</p>	<p>b. Provide available details upon request.</p>	

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>c. Arrange for an appropriate review, including root cause analysis where required, and prepare, agree with the Association, and implement a Corrective Action Plan to prevent recurrence. SEA/SH incidents shall be handled in a confidential and survivor-centered manner without requiring disclosure of personally identifiable information.</p>	<p>c. Submit the review report and Corrective Action Plan within 10 business days of the initial notice, unless otherwise agreed with the Association.</p>	
<p>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</p>		
<p>1.1 ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS Adopt, and implement the Environmental and Social Impact Assessment (ESIA) and corresponding Environmental and Social Management Plan (ESMP) for the transmission line, Chipata West Substation expansion, access arrangements, worker camps, laydown areas, and associated construction activities, consistent with the ESSs and in form and substance acceptable to the Association.</p> <p>ESIA (with ESMP) includes relevant management measures for vegetation clearing, soil erosion, watercourse crossings, dust and noise, waste, hazardous materials, traffic, community health and safety, GBV/SEA/SH, labour influx, biodiversity, cultural heritage, and emergency preparedness and response.</p>	<p>Adopt the ESIA/ESMP prior to commencement of activities and thereafter implement the ESIA/ESMP throughout the Project.</p>	<p>ZESCO Limited</p>
<p>1.2 MANAGEMENT OF CONTRACTORS Incorporate relevant aspects of the ESCP, the ESIA/ESMP, RAP, SEP, LMP, GBV/SEA/SH Action Plan, OHS requirements, Biodiversity Management Plan, Chance Finds Procedure, and other relevant instruments into the ESHS specifications of procurement documents and contracts for contractors, subcontractors, and supervising firms.</p>	<p>Include ESHS requirements in procurement documents and contracts before issuance of bidding documents and signing of contracts.</p>	<p>ZESCO Limited, Supervising Engineer, and contractors</p>
<p>Require contractors to prepare, submit for review, adopt, and implement C-ESMPs and site-specific management plans, including OHS Plan, Traffic Management Plan, Waste and Hazardous Materials Management Plan, Emergency Preparedness and Response Plan, Labour Influx and Worker Accommodation Plan, Biodiversity</p>	<p>Contractors to submit C-ESMPs and site-specific plans for approval before site mobilization and before commencement of works.</p>	

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
Management Plan, Chance Finds Procedure, and Code of Conduct with SEA/SH provisions.		
Ensure that the contractors and supervising firms comply and that they require their subcontractor to comply with E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association.	Supervise contractors throughout Project implementation.	
1.3 TECHNICAL ASSISTANCE Ensure that terms of reference, studies, designs, technical assistance, capacity building, and training activities financed under the Project are prepared and implemented in a manner consistent with the ESSs and acceptable to the Association. This includes assessment of downstream environmental and social implications of technical outputs, including power trade, transmission planning, operational protocols, future corridor expansion studies, and related feasibility or system studies.	Throughout Project implementation. Terms of reference to be submitted to the Association for review and no-objection before launch of relevant TA activities, where required.	ZESCO Limited
1.4 ASSOCIATED FACILITIES AND CROSS-BORDER COORDINATION Screen and document, to the extent required under ESS1 and within the Zambian boundary, and through coordination with relevant counterparts and financiers, environmental and social risks and impacts related to facilities or activities that are directly and significantly related to the Project and necessary to achieve its objectives, including the Malawi segment of the interconnector and related substation works, if these meet the definition of associated facilities under the ESF. Coordinate with relevant Malawi counterparts, ESKOM, SAPP, and financiers to promote alignment of environmental and social risk management, stakeholder engagement, operational safety, and implementation schedules across the interconnector.	Initial associated facilities screening to be completed before Project effectiveness. Coordination to continue throughout Project preparation and implementation.	ZESCO Limited, with support from Ministry of Energy and relevant counterparts
1.5 ACTIVITIES SUBJECT TO RETROACTIVE FINANCING Ensure that any activities proposed for retroactive financing have been assessed and implemented in accordance with the ESSs and the requirements of this ESCP, including environmental and social screening, stakeholder engagement, labour and OHS measures, and incident reporting, as applicable.	Before submission of withdrawal applications for retroactive financing and throughout implementation of any retroactively financed activities.	ZESCO Limited
ESS 2: LABOUR AND WORKING CONDITIONS		
2.1 LABOUR MANAGEMENT PROCEDURES		ZESCO Limited

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>Prepare, disclose, adopt, and implement Labour Management Procedures (LMP) for the Project, consistent with ESS2. The LMP shall include provisions on worker categories; terms and conditions of employment; non-discrimination and equal opportunity; child labour and forced labour prohibition; age verification; occupational health and safety; worker accommodation; contractor and subcontractor labour management; worker code of conduct, including GBV/SEA/SH provisions; worker grievance mechanism; and requirements for primary suppliers where relevant.</p>	<p>Prepare, disclose, and adopt the LMP before Project effectiveness. Implement the LMP throughout Project implementation.</p>	
<p>2.2 OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT</p> <p>Require contractors and subcontractors to prepare, adopt, and implement OHS Management Plans consistent with ESS2, national law, Good International Industry Practice (GIIP), and the Project ESMP. OHS Plans shall address, inter alia, work at height, electrical safety, lifting operations, excavation safety, traffic interface, emergency response, Personal Protective Equipment (PPE), worker training, toolbox talks, incident reporting, and supervision of subcontractors.</p>	<p>Contractor OHS Plans to be approved before commencement of works and implemented throughout contract implementation.</p>	<p>ZESCO Limited, Supervising Engineer, and contractors</p>
<p>2.3 GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, consistent with ESS2 and the LMP. The worker GRM shall be separate from the community GRM and shall include confidential channels for GBV/SEA/SH-related concerns and protection against retaliation.</p>	<p>Worker GM to be established before engaging Project workers and maintained throughout Project implementation.</p>	<p>ZESCO Limited and contractors</p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT		
<p>3.1 WASTE AND HAZARDOUS MATERIALS MANAGEMENT</p> <p>Prepare, adopt, and implement waste and hazardous materials management measures as part of the ESMP and C-ESMPs, covering hazardous and non-hazardous waste, construction waste, e-waste, transformer oils, fuels, lubricants, spill prevention and response, storage, transport, licensed disposal, waste manifests, and emergency response.</p>	<p>Measures to be included in the ESMP and C-ESMPs before commencement of works. Implement throughout Project implementation.</p>	<p>ZESCO Limited and contractors</p>
<p>3.2 RESOURCE EFFICIENCY AND POLLUTION PREVENTION</p> <p>Incorporate and implement resource efficiency and pollution prevention measures, including water management, aggregate and material sourcing, borrow pit management, dust and noise control,</p>	<p>Measures to be included in ESMP and C-ESMPs before commencement of relevant works and implemented</p>	<p>ZESCO Limited and contractors</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
erosion and sediment control, wastewater management, hazardous materials management, pesticide/herbicide restrictions for vegetation management, SF6 handling and leak prevention, and rehabilitation of disturbed areas.	throughout Project implementation and operation, as applicable.	
ESS 4: COMMUNITY HEALTH AND SAFETY		
4.1 TRAFFIC AND ROAD SAFETY Prepare and implement traffic and road safety measures as part of the ESMP and C-ESMPs. Measures shall address transport of materials and equipment, heavy vehicle routes, speed limits, signage, community awareness, school and settlement crossings, vehicle inspection, driver training, accident reporting, and coordination with relevant road authorities.	Traffic Management Plan to be approved before commencement of works involving transport of materials, equipment, or heavy vehicles; implement throughout construction.	ZESCO Limited, Supervising Engineer, and contractors
4.2 COMMUNITY HEALTH AND SAFETY Assess and manage risks to communities arising from construction and operation, including labour influx, communicable diseases, GBV/SEA/SH, traffic and road safety, exposure to hazardous materials, electrical safety, excavation and tower works, emergency events, community access disruption, and interaction with security personnel, if any. Include mitigation measures in the ESMP, C-ESMPs, SEP, and relevant site-specific plans.	Same timeframe as the ESMP and C-ESMPs. Implement throughout Project implementation.	ZESCO Limited and contractors
4.3 SEA/SH RISKS Prepare, adopt, and implement a GBV/SEA/SH Action Plan proportionate to the Project risk rating. The plan shall include worker Codes of Conduct, sanctions for non-compliance, training for workers and communities, confidential survivor-centered reporting, service provider mapping and referral pathways, protocols for handling GBV/SEA/SH grievances, and monitoring arrangements.	GBV/SEA/SH Action Plan to be prepared, disclosed where appropriate, and adopted before commencement of works; implement throughout Project implementation.	ZESCO Limited and contractors
4.4 SECURITY MANAGEMENT If security personnel are engaged for the Project, prepare, adopt, and implement security management measures consistent with ESS4 and GIIP. Measures shall include screening and training of security personnel, rules of conduct, proportional use of force, grievance access for security-related complaints, and incident reporting.	Before engagement of security personnel and thereafter throughout any period security personnel are used.	ZESCO Limited and contractors

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>4.5 DAM SAFETY</p> <p>Not applicable. The Project does not involve dams or rely on dam safety under ESS4 Annex 1.</p>	N/A	N/A
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT		
<p>5.1 RESETTLEMENT ACTION PLAN</p> <p>Finalise, disclose, adopt, and implement a Resettlement Action Plan (RAP) consistent with ESS5 and acceptable to the Association. The RAP shall address permanent land acquisition, temporary construction impacts, restrictions on land use within the right-of-way, physical relocation, economic displacement, valuation and compensation at replacement cost, livelihood restoration, transitional support, assistance to vulnerable persons, consultation, grievance management related to resettlement, institutional arrangements, budget, implementation schedule, and monitoring.</p>	Finalise, disclose, adopt and implement the RAP 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 persons have been resettled and where applicable, moving allowances have been provided.	ZESCO Limited
<p>No civil works shall commence in any section until compensation has been paid and resettlement assistance and livelihood restoration measures for that section have been provided in accordance with the RAP and documented through a RAP implementation/completion report acceptable to the Association, except as otherwise agreed with the Association in writing.</p>	Implement and document RAP measures before taking possession of land or assets and before commencement of civil works in the affected section. Continue livelihood restoration and monitoring throughout Project implementation as set out in the RAP.	
<p>5.2 RAP MONITORING AND COMPLETION</p> <p>Monitor RAP implementation, including compensation payments, relocation assistance, livelihood restoration, support to vulnerable persons, grievances, and residual impacts. Prepare RAP implementation and completion reports acceptable to the Association.</p>	RAP monitoring reports to be submitted as part of quarterly ESHS reports. RAP completion report to be submitted prior to commencement of works in relevant sections or as agreed with the Association.	ZESCO Limited
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES		
<p>6.1 BIODIVERSITY RISKS AND IMPACTS</p> <p>Update, adopt, and implement biodiversity management measures consistent with ESS6 as part of the ESMP and C-ESMPs. Measures shall include habitat classification and mapping, vegetation clearing controls, no-go areas, pre-clearance surveys, protection of sensitive species and habitats including Pancake Tortoise protocols where relevant, avifauna collision/electrocution risk management including bird diverters where required, post-construction avifauna monitoring for at least the first</p>	Biodiversity measures, including pre-clearing surveys before vegetation clearance, to be included in the ESIA/ESMP before Project effectiveness. Implement throughout Project implementation and, as applicable, operation.	ZESCO Limited, Supervising Engineer, and contractors

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
operational year, invasive species controls, rehabilitation of disturbed areas, and biodiversity monitoring with adaptive management triggers.		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES		
7.1 ESS7 SCREENING ESS7 is not currently relevant.	N/A	N/A
ESS 8: CULTURAL HERITAGE		
8.1 CULTURAL HERITAGE RISKS AND IMPACTS Assess material and immaterial cultural heritage risks through the ESIA and consultation with relevant authorities and communities. Where required, prepare and implement a Cultural Heritage Management Plan or site-specific measures consistent with ESS8 and national requirements.	Cultural heritage measures to be included in site-specific measures to be approved before commencement of works in relevant areas.	ZESCO Limited and contractors
8.2 CHANCE FINDS Prepare, adopt, and implement a Chance Finds Procedure as part of the ESMP and C-ESMPs. The procedure shall include stop-work requirements, protection of the find, notification of the National Heritage Conservation Commission and relevant authorities, community consultation where appropriate, and authorization before works resume.	Chance Finds Procedure to be included in ESMP and C-ESMPs before commencement of works and implemented throughout Project implementation.	ZESCO Limited and contractors
ESS 9: FINANCIAL INTERMEDIARIES		
9.1 FINANCIAL INTERMEDIARIES ESS9 is not relevant. The Project does not involve financial intermediaries.	N/A	N/A
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE		
10.1 STAKEHOLDER ENGAGEMENT PLAN Adopt, and implement a Stakeholder Engagement Plan (SEP), consistent with ESS10. The SEP shall include stakeholder identification and analysis; engagement methods and schedule; measures for inclusive consultation with women, vulnerable groups, and affected households; disclosure arrangements; responsibilities; budget; monitoring; and reporting.	Adopt and implement the SEP throughout the Project.	ZESCO Limited
10.2 PROJECT GRIEVANCE MECHANISM		ZESCO Limited

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>Establish, publicise, maintain, and operate an accessible project grievance mechanism to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent, culturally appropriate, and readily accessible manner, at no cost and without retribution.</p> <p>The GRM shall be equipped to receive, register, and facilitate resolution of GBV/SEA/SH complaints in a safe, confidential, and survivor-centered manner, including referral of survivors to relevant service providers and without requiring survivors to submit complaints through public or community grievance committees.</p>	<p>Establish and operationalize the GRM prior to the Project effectiveness and before commencement of RAP implementation, and thereafter maintain throughout Project implementation.</p>	
INDICATORS FOR IMPLEMENTATION READINESS		
<p>The following actions are indicators for implementation readiness:</p> <p>A - Organisational structure complete.</p> <p>2.1 LMP adopted</p> <p>2.3 Worker GRM operational prior to recruitment of workers.</p> <p>4.1 Traffic Management Plan approved before works commence</p> <p>4.3 GBV/SEA/SH Action Plan adopted before works commence</p> <p>5.1 RAP finalized, disclosed, adopted, and implemented before taking possession of land/assets and before civil works in affected sections.</p> <p>6.1 Biodiversity management measures adopted before vegetation clearing.</p> <p>10.1 Project GRM operational.</p>	<p>Before commencement of relevant Project activities and throughout implementation, as applicable.</p>	<p>ZESCO Limited</p>