

**Argentine Republic
Ministry of Human Capital**

**Integrated Early Childhood Development Project
P505675**

Draft

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

September 27th, 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Argentine Republic (Borrower) will implement the Integrated Early Childhood Development Project (the Project) with the involvement of the Ministry of Human Capital (*Ministerio de Capital Humano* or MCH) through the Subsecretary of Administrative Management (*Subsecretaría de Gestión Administrativa* or SSGA), which will be supported by the General Directorate of Special Projects and International Cooperation (*Dirección General de Proyectos Especiales y Cooperación Internacional* or DGPEyCI) of the National Secretariat of Childhood, Adolescence, and Family (*Secretaría Nacional de Niñez, Adolescencia y Familia* or SENAF), as set out in the Loan Agreement. The International Bank for Reconstruction and Development (the Bank), has agreed to provide financing for the Project, as set out in the referred agreement.
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 Loan Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred 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, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Bank.
4. As agreed by the Bank and the Borrower, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Borrower, through the DGPEyCI, and the Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the General Director of the DGPEyCI. The Borrower shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, stakeholder engagement activities, and functioning of the grievance mechanisms.</p> <p>The Project Operational Manual (POM) will reflect the minimum content of the corresponding reports.</p>	<p>Submit reports to the Bank no later than 45 days after the end of each calendar semester throughout Project implementation, as part of the Project Reports required by the Loan Agreement.</p>	<p>SSGA from MCH through DGPEyCI</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>C.1. Promptly notify the Bank of any incident or accident related 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, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury.</p> <p>C.2. Prepare and share with the Bank an "Incident Report" on each incident or accident that provides information on the scope, seriousness, and possible causes thereof, and indicates the immediate measures that have been or are expected to be taken to address it. Subsequently, at the Bank's request, conduct an investigation on the incident or accident and prepare an "Investigation Report" and, if needed, a "Corrective Action Plan", proportional to the incident or accident, to establish the causes of the accident or incident and propose corrective actions to prevent its recurrence.</p> <p>The POM will reflect the minimum content of the corresponding reports.</p>	<p>C.1. Notify the Bank via email to the Bank's task team leader no later than 22 business days after learning of the incident or accident.</p> <p>C.2. The "Incident Report", and later, the "Investigation Report" and the "Corrective Action Plan", as applicable, need to be presented within a timeframe acceptable to the Bank.</p>	<p>SSGA from MCH through DGPEyCI</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Operate and maintain an organizational structure within the responsible entity with qualified staff and resources to support the management of ESHS risks and impacts of the Project. The team shall be comprised, at least, of a social specialist and an environmental specialist.</p>	<p>The team within DGPEyCI, including the E&S qualified staff, is already established. This team shall remain operational and with their corresponding roles throughout Project implementation.</p>	<p>SSGA from MCH through DGPEyCI</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>The established team within the responsible entity shall coordinate its functions with designed focal points of the substantive areas of ANSES, National Council for the Coordination of Social Policies (<i>Consejo Nacional de Coordinación de Políticas Sociales</i> or CNCPS), and SENAF. Necessary coordination arrangements for Project execution and monitoring, including ESHS matters, shall be reflected in the POM.</p>		
<p>1.2 TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project, are carried out in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	<p>Throughout Project implementation.</p>	<p>SSGA from MCH through DGPEyCI, with the support of the ANSES, the SENAF and the CNCPS</p>
<p>1.3 VULNERABLE GROUPS</p> <p>Identify and assess potential barriers that disadvantageous and vulnerable groups may face to have access to the activities financed by the Project, as well as the mitigation actions to ensure that: (i) these groups are afforded opportunities to participate in planning and/or implementation of activities that affect them; and (ii) opportunities to provide such groups with culturally appropriate benefits are considered.</p> <p>Regarding vulnerable groups in general (including afro-descendants, indigenous peoples, peoples with disabilities, LGTBQ+ people, migrants), develop trainings containing discrimination and stigmatization prevention for provincial teams and Early Child Development caregivers under Part 2 of the Project.</p> <p>Regarding people with disability in particular, include in the agreements with the provinces under component 2 provisions for:</p> <ol style="list-style-type: none"> 1. Identification of Early Child Development Centers (<i>Centros de Desarrollo Infantil</i> or EDI), civil society organizations (CSO) and other services targeted at children with disabilities, and the unmet needs of this group, in the jurisdictional assessments. 2. Develop consultations and collaboration actions with CSO related to disability for the preparation and execution of strategic operational plans. 3. Design guidelines for inclusive family support, as well as the adaptation of EDI, in cases where they serve children with disabilities. 4. Develop inclusive adaptation of education and training plans and the digital platform for care teams. 	<p>Throughout Project implementation.</p>	<p>SSGA from MCH through DGPEyCI, with the support of the SENAF</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Measures for Indigenous Peoples are defined in actions 7.1 and 7.2 below. ,		
1.4	<p>AGREEMENTS BETWEEN NATIONAL GOVERNMENT AND PROVINCES UNDER C2</p> <p>The Umbrella Agreements to be signed between SENAF and the Participating Provinces to be signed for the Capitation Payments or the Family Support Activities under Parts 2.2 and 2.3 of the Project respectively, will include restrictions to the use of Bank’s resources aligned with a low environmental risk rating (e.g., infrastructure retrofitting or enhancements will be excluded) and requirements on social inclusion. The POM will incorporate a template for these agreements, which will include an exclusion list and social management requirements.</p>	Throughout Project implementation.	SSGA from MCH through DGPEyCI, with the support of the SENAF
1.5	<p>ACTIVITIES SUBJECT TO RETROACTIVE FINANCING</p> <p>The implementation of activities related to Part 1 of the Project may be subject to retroactive financing. DGPEyCI shall submit evidence satisfactory to the Bank that such activities were carried out in compliance with the requirements of the ESSs and requirements included in this ESCP.</p> <p>The POM shall detail the process for requesting and granting such retroactive financing and the reporting requirements.</p>	Prior to any payment requests that may be subject to retroactive financing in the form of reimbursements under Part 1 of the Project, DGPEyCI shall obtain the Bank's No Objection to the ESHS arrangements associated with such payments.	SSGA from MCH through DGPEyCI, with the support of the ANSES
1.6	<p>SEXUAL EXPLOITATION AND ABUSE/SEXUAL HARASSMENT</p> <p>Inclusion of contents on detection and referral to sexual abuse in childhood in training for Early Childhood agents under Part 2 of the Project.</p> <p>Promote the articulation of local and provincial care systems with the System for the Promotion and Protection of Children's Rights.</p>	Throughout Project implementation.	SSGA from MCH through DGPEyCI, with the support of the SENAF
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>USE OF BORROWER’S LABOR FRAMEWORK</p> <p>ESHS risks and impacts related to labor and working conditions were assessed low for Project activities. Therefore, National Framework is considered to appropriately cover requirements under ESS 2. This commitment will be reviewed in case ESHS risks and impacts are reassessed and found substantial or high. In that case, Labor Management Procedures will be developed to ensure compliance with ESS 2.</p>	<p>1. Throughout Project implementation.</p> <p>2. Notify the Bank immediately after taking notice of the change to the Borrower ES Framework. Subsequent actions, if requested by the Bank, shall be reflected in an updated ESCP as indicated in paragraph 4 of the Initial Section of this ESCP.</p>	SSGA from MCH through DGPEyCI, with the support of the ANSES, the SENAF and the CNCPS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>1. Ensure that all contracts, including direct, contracted and community workers, reflect appropriate labor and working conditions in accordance with National Framework and ESS2 and that workers are duly informed of their labor conditions. Assess all ESHS risks and impacts of the Project in relation to labor and working conditions and define mitigation measures in the POM in accordance with this ESCP and the National Framework, which includes <i>inter alia</i>, the country’s relevant policy, legal and institutional framework, its national, departmental, or local implementing institutions and applicable laws, regulations, procedures, and implementation capacity.</p> <p>2. Promptly notify the Bank of any changes to the Borrower ES Framework that may materially adversely affect the Borrower’s ability to manage the ESHS risks and impacts of the Project in line with ESS2 and the 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, in the opinion of the Bank, such changes adversely affect relevant ESHS risk management aspects of the Project, the Borrower shall agree to implement measures and actions to address them in a manner acceptable to the Bank and shall update the ESCP to reflect such agreed actions.</p>		
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Assess current grievance mechanisms for Project workers from SENAF, ANSES and CNCPS, strengthen them if needed, and operate them in a manner consistent with ESS2.</p>	Assess current grievance mechanism and define strengthen measures prior to engaging Project workers and thereafter maintain and operate them throughout Project implementation.	SSGA from MCH through DGPEyCI, with the support of the ANSES, the SENAF and the CNCPS
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>E-WASTE MANAGEMENT</p> <p>Assess the electrical and electronic waste management mechanisms implemented by the SENAF and the CNCPS and, in consultation with the Bank, develop, adopt, and implement an e-waste management plan (EWMP) to strengthen such mechanisms, consistent with ESS3 and relevant regulation. The EWMP shall include, among others, capacity building and training to SENAF and CNCPS personnel.</p> <p>The POM shall include the content and scope of the EWMP.</p>	Develop and adopt the e-waste management plan prior to distributing the first batch electronic equipment to be acquired under Parts 2.1 and 3 of the Project.	SSGA from MCH through DGPEyCI, with the support of the SENAF and the CNCPS
3.2	<p>RESOURCE EFFICIENCY</p> <p>Incorporate resource efficiency measures in the technical specifications of the bidding documents for the purchase of all hardware and electronic equipment.</p>	Before launching the bidding processes for the purchase of all hardware and electronic equipment.	SSGA from MCH through DGPEyCI, with the support of the SENAF and the CNCPS
ESS 4: COMMUNITY HEALTH AND SAFETY			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
Not currently relevant		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT		
Not currently relevant		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES		
Not currently relevant		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES		
<p>7.1 MEASURES FOR INDIGENOUS PEOPLES</p> <p>Implement measures to address risks of exclusion of indigenous peoples from Project benefits, consistent with ESS7, including:</p> <ol style="list-style-type: none"> 1. Assessment of access barriers through consultations with technical areas and community leaders regarding: <ol style="list-style-type: none"> a. Automatic registration of Universal Pregnancy Allowance (AUE) through the cross-referencing of administrative records with the SUMAR Program. b. Automatic accreditation of conditionalities from AUE, Universal Child Allowance and Benefit for Comprehensive Health Coverage through cross-checking with Health and Education databases. 2. Design, consult and implement specific attention actions in isolated communities, permanent contact with community leaders trained in ANSES systems and dissemination of information with communication material on allowances translated into the languages of the different ethnic groups. 3. Include in the agreements with the provinces under Component 2 provisions, provide technical support and follow up on measures to: <ol style="list-style-type: none"> a. Identification of EDIs, CSO and other services that serve children of indigenous peoples, and the unmet needs of the communities, in the jurisdictional diagnosis of the state of the situation. b. Consult with indigenous peoples' representatives for the preparation and execution of strategic operational plans. c. Strengthening the approach to indigenous peoples through the design of guidelines for culturally appropriate family accompaniment, as well as the adaptation of EDIs, in cases where they serve indigenous population. d. Training care teams in interculturality. 4. Develop the cross-referencing of data between ANSES and CNCPS on benefits for indigenous peoples. 5. Incorporate the indigenous peoples' variable in territorial surveys and evaluations, and in databases where feasible. 	<ol style="list-style-type: none"> 1. Develop the assessment no later than one hundred and twenty (120) days after Project effectiveness. 2. 3. 4. and 5. Throughout Project implementation. 	<p>SSGA from MCH through DGPEyCI, with the support of the ANSES (1 and 2), the SENAF (3) and the CNCPS (4 and 5)</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
7.2	<p>GRIEVANCE MECHANISM</p> <ol style="list-style-type: none"> Publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances from Indigenous Peoples in relation to Part 1 of the Project. Assess cultural adaptation needs for Grievance Mechanisms for Parts 2 and 3 of the Project. Implement cultural adaptations, if needed. 	<ol style="list-style-type: none"> Throughout Project implementation. Develop the assessment no later than one hundred twenty (120) days after Project effectiveness. Throughout Project implementation. 	<p>SSGA from MCH through DGPEyCI, with the support of the ANSES (1), the SENAF and the CNCPS (2 and 3)</p>
ESS 8: CULTURAL HERITAGE			
Not currently relevant			
ESS 9: FINANCIAL INTERMEDIARIES			
Not currently relevant			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <ol style="list-style-type: none"> Develop a public consultation through the national website for public consultations Develop focused consultations with areas of the national and provincial governments, national OSC, UNICEF and selected universities to monitor Project results and lessons learned at mid-term and during the last year of the Project. Develop consultations through participating provinces under component 2 with local governments, OSC, representatives from ECDC and representatives from the System for the Promotion and Protection of Children's Rights. <p>Develop all activities in a manner consistent with ESS10, including 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>	<ol style="list-style-type: none"> Before December 31st, 2024. At mid-term and during the last year of Project implementation Throughout Project implementation 	<p>SSGA from MCH through DGPEyCI, with the support of the ANSES, the SENAF and the CNCPS</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Assess existing grievance mechanisms of ANSES, SENAF and CNCPS and develop corrective measures, if needed, to grant they are accessible, and able 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 mechanisms 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>Assess mechanisms and define corrective measures no later than one hundred twenty (120) days after Project effectiveness, and thereafter maintain and operate such mechanisms throughout Project implementation.</p>	<p>SSGA from MCH through DGPEyCI, with the support of the ANSES, the SENAF and the CNCPS</p>
CAPACITY SUPPORT			
CS1	<p>Training may be required for MHC staff, as appropriate, on:</p> <ul style="list-style-type: none"> • Stakeholder mapping and engagement • E-waste management • Grievance Mechanisms • Gender and intercultural perspective • Disability inclusion • Prevention of SEA/SH risks. <p>The POM will outline the details and timing of these training.</p>	<p>Regular training, as necessary.</p> <p>Develop the first training during the first year of Project implementation.</p>	<p>SSGA from MCH through DGPEyCI</p>