Saint Vincent and the Grenadines

Ministry of Finance, Economic Planning and Information Technology (MoFEPIT)

Saint Vincent and the Grenadines Volcanic Eruption Emergency Project (P176943)

Negotiated Version ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

October 28, 2021

V2 update: November 29, 2023

With removal of E&S Focal Point roles:

ESS1: Assessment and Management of Environmental and Social Risks and Impact Section 1.1 - Organization Structure, delete 1.1 b.

ESS 10: Stakeholder Engagement and Information Disclosure
Section 10.2 - Project Grievance Mechanism, under Timeframe, delete the second sentence.

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

- The Government of Saint Vincent and the Grenadines (hereinafter the Recipient), will implement the Saint Vincent and the Grenadines Volcanic Eruption Emergency Project (P176943) (the Project), through the Ministry of Finance, Economic Planning and Information Technology (MoFEP). The International Development Association (hereinafter the Association) has agreed to provide financing for the Project.
- 2. The Recipient shall carry out the Project in accordance with the Environmental and Social Standards (ESSs). To this end, this Environmental and Social Commitment Plan (ESCP) sets out material measures and actions to be carried out or caused to be carried out by the Recipient, including the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, grievance management, and the environmental and social assessments and instruments to be prepared or updated, disclosed, consulted, adopted and implemented upon the ESCP and ESSs, all in a manner acceptable to the Association.
- 3. The Recipient is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by any other entity as indicated.
- 4. The Recipient shall also comply with the provisions of any other E&S instruments required under the ESSs and referred to in this ESCP, such as Environmental and Social Management Framework, (ESMF) Environmental and Social Management Plans (ESMPs), Labour Management Procedures (LMP) Resettlement Policy Framework (RPF), Resettlement Action Plans (RAPs), and Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S instruments.
- 5. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Association by the Recipient as required by the ESCP and the conditions of the legal agreement.
- 6. As agreed by the Association and the Borrower, 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, the Recipient shall agree to the changes with the Association and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Association and the Recipient through the Director of MoFEP. The MoFEP shall promptly disclose the updated ESCP.
- 7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include risks and impacts, such as environmental, health, and safety impacts, labour influx, gender-based violence.

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONIT	FORING AND REPORTING		
A	REGULAR REPORTING Prepare and submit to the Association 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, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).	Quarterly ESHS reports throughout Project implementation submitted to the Association no later than 45 days after the end of each quarter, starting from the Effective Date	MoFEP
В	INCIDENTS AND ACCIDENTS 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, the affected communities, the public or workers including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), accidents that result in death, serious or multiple injury, cases of COVID–19, dengue, cholera, and malaria among Project workers. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Association's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.	Notify the Association within 48 hours after learning of the incident or accident. A full report would be provided within a timeframe acceptable to the Association, as requested.	MoFEP

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
С	 CONTRACTORS MONTHLY REPORTS Upon the Association's request, submit contractor and/or supervision consultant monthly monitoring reports on environmental, social, health and safety (ESHS) aspects, explaining the compliance status of Project investments with the E&S mitigation measures and monitoring. The report will cover, inter alia: Status of implementation of Contractor's ESMP (C–ESMP) ESHS incidents ESHS supervision Usage of Personal Protective Equipment (PPE) such as hard hats, safety shoes, masks suitable for the activity, and safety and other measures as needed to prevent the spread of COVID–19 Training conducted, and workers participation recorded Workers' grievances Community grievances 	Reports shall be compiled monthly but may be collated into quarterly reporting period for the Association. Reports shall also be provided upon the Association's request throughout Project implementation.	Mofep
1.1	ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISK ORGANIZATIONAL STRUCTURE	S AND IMPACTS	MoFEP
1.1	a. MoFEP, shall establish and maintain include, <i>inter alia</i> , one (1) dedicated and qualified Environmental Specialist and one (1) dedicated and qualified Social Specialist, with qualifications and experience satisfactory to the Association, and thereafter maintained throughout Project implementation to ensure effective ESHS management.	a. One environmental specialist (full-time) and one social specialist (full-time) shall be contracted or assigned no later than ninety (90) days after the Project Effective Date based on the agreed Terms of Reference (ToR) and maintained throughout project implementation.	IVIOI ET
	b. Adequate resources shall be allocated to support management of ESHS risks of the Project including the implementation of the Stakeholder Engagement Plan and the Grievance Redress Mechanism, training of contractors, project staff and the Ministry's staff.	b. Throughout Project implementation.	

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.2	ENVIRONMENTAL AND SOCIAL ASSESSMENT Finalise, consult, adopt, disclose and implement an Environmental and Social Management Framework (ESMF), in accordance with the ESSs, the EHSGs, and other relevant Good International Industry Practice (GIIP), and in a manner acceptable to the Association. The ESMF shall include, inter alia, a screening procedure, and procedures and requirements for carrying out site-specific Environmental and Social Impact Assessments (ESIAs) and Environmental and Social Management Plans (ESMPs) where required, as well as generic environmental and social procedures/codes applicable for the specific Project activities.	ESMF to be prepared, consulted, disclosed and adopted not later than ninety (90) days after the Effective Date of the Project.	MoFEP

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	 MANAGEMENT TOOLS AND INSTRUMENTS a. Screen any proposed Project activity in accordance with the Environmental and Social Management Framework (ESMF) prepared for the Project, and, thereafter, prepare, consult, disclose, adopt and implement the site-specific Environmental and Social Impact Assessments (ESIAs) and Environmental and Social Management Plan (ESMPs), as required, in a manner acceptable to the Association. b. The MoFEP shall screen and exclude from the Project any proposed Project activities that may fall within the exclusion criteria set out in the ESMF. c. c. The MoFEP will use the existing ESMF and RPF with its screening tool, of the Regional Disaster Vulnerability Reduction Project (RDVRP) (P117871) as the basis for developing (including consultations) of the ESMF and RPF of the Project. Until the fnalization and adoption of the ESMF and RPF, the MoFEP shall submit the screening reports, ESMPs and RAPs to the Association for review and approval prior to the carrying out the relevant Project activities. No activities that may cause material environmental and social risks and impacts shall be considered for implementation till the finalization, disclosure, and adoption of the environmental and social instruments i.e., ESMF and RPF. 	a and b. For Project activities that require the preparation of ESIAs and/or ESMPs, MoFEP shall be prepare, consult with stakeholders, and (when required as per the ESMF) submit them for the Association's review and approval. Subject to said approval, MoFEP shall thereafter adopt and disclose prior to launching the bidding process and implement them throughout Project implementation. The ESIAs/ESMPs shall be included in the contracts with contractors. No activities shall start before the ESIAs/ESMPs have been prepared, and disclosed, and when required as per the ESMF approved in advance by the Association. c. Any required ESMPs shall be included in the contracts with contractors. No activities shall start before the ESMPs have been prepared, consulted, and disclosed,	RESPONSIBLE ENTITY/AUTHORITY MOFEP
	 d. Ensure that the retroactive financing of any activity under Category 2, as defined under the Financing Agreement, complies with the ESMF and other relevant. 	Association,	

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	 MANAGEMENT OF CONTRACTORS a. Incorporate the relevant aspects of the ESMF, including requirements as per the ESIAs and ESMPs, other relevant E&S instruments and/or plans, Code of Conduct, and the Labour Management Procedures, into the ESHS specifications of respective bidding and contract documents for contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts. 	 a. During the term of all contractual activities of the Project, including: Prior to the preparation of procurement documents. Before mobilization of each contractor and maintained throughout the construction period. 	MoFEP
	 Ensure robust supervision of the contractors during the implementation of the Project to ensure that they comply with all relevant ESHS specifications and codes of conduct as specified in their respective contracts, and take the corrective actions as required. 	b. Throughout Project implementation and reported in the monthly and quarterly reports.	
1.5	PERMITS, CONSENTS AND AUTHORIZATIONS Obtain or assist in obtaining, as appropriate, the permits, consents and authorizations that are applicable to the Project from relevant authorities. Comply or cause to comply, as appropriate, with the conditions established in these permits, consents and authorizations throughout Project implementation.	As applicable, to be obtained prior to initiating activities that require permits, consents and authorizations.	MoFEP
1.6	TECHNICAL ASSISTANCE 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 Association, that duly incorporate and take into consideration the requirements of the ESSs.	Throughout Project implementation.	MoFEP

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	LABOUR MANAGEMENT PROCEDURES Develop, adopt and implement Labour Management Procedures (LMP) for the Project in accordance with the applicable requirements of ESS2, in a manner acceptable to the Association, including, inter alia, adequate occupational health and safety measures (including emergency preparedness and response measures), grievance arrangements for Project workers, a worker's Code of Conduct, and other labour requirements to be incorporated into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. The LMP shall also include specific prohibitions in terms of child labour and forced labour. Where the project includes the provision of labor by community workers, it will apply the relevant provisions of ESS2 in a manner which reflect and is proportionate to: (a) the nature and scope of the activities; (b) the specific project activities in which the community workers are engaged; and (c) the nature of the potential risks and impacts to the community worker. Assess the working conditions and occupational health and safety aspects in relation to community labor and shall apply in a manner which reflects (a) to (c) above. The LMP shall set out the circumstances where these requirements are applicable.	LMP shall be developed and adopted as early as possible, but no later than ninety (90) days after the Project Effective Date. All measures specified in the LMP to be implemented throughout Project implementation. Throughout Project implementation.	Mofep
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain, and operate a grievance mechanism specifically for Project workers, as described in the LMP and consistent with ESS2.	The Grievance Mechanism for project workers shall be specified in the LMP and shall be established as early as possible, but no later than ninety (90) days after the Effective Date and prior to the engagement of direct, contracted and community workers. The Grievance Mechanism for Project workers shall be functional throughout Project implementation.	MoFEP

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.3	occupational Health and Safety (OHS) MEASURES a. Develop and implement Occupational, Health and Safety Plans (OHSPs) that include COVID—19 safety measures as part of the development and implementation of site—specific ESIAs and ESMPs, in accordance with relevant guidelines to be specified in the ESMF and LMP.	a. Same timeframe as for the preparation and implementation of the site-specific ESIAs and / or ESMPs as action 1.3 above.	MoFEP
	b. Incorporate relevant OHS measures in bid and contract documents for all construction and supervision firms.	b. Prior to the bidding process of each works package.	
	c. Ensure that the supervision firms hire or assign qualified OHS staff as required.	c. Prior to the bidding process for the supervision firms.	
	d. Ensure that the OHSPs measures specified are implemented at each of the individual worksites.	d. Throughout implementation of each individual work.	
2.4	EMERGENCY PREPAREDNESS AND RESPONSE Develop and implement Emergency Response Plan (ERP) as part of the site-specific ESIAs and ESMPs, in accordance with the guidelines to be specified in the ESMF and ensure coordination with measures under 4.7. Ensure workers and contractors are trained and implement the ERP.	Same timeframe as for the preparation and implementation of the site-specific ESIAs and / or ESMPs as action 1.3 above.	MoFEP

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.5	PROJECT WORKERS TRAINING Implement, and require contractors and supervision consultants to implement, capacity building activities for Project workers, designed to raise awareness about the health and safety risks and management measures associated with Project activities, as shall be specified in the LMP and the ESMF. Specifically, this shall include: Codes of conduct and other topics related to managing risks stemming from labor infux and workforce management, for contractors. Orientation on OHSPs and ERPs, including for any community workers. Awareness of the labor grievance mechanism under the Project, for all Project workers.	As a part of the on-boarding process for any worker involved in the Project, as well as refresher sessions throughout the execution of works.	Mofep
2.6	CODE OF CONDUCT Establish provisions in the bidding documents for contractors and supervision consultants to establish a Code of Conduct to be signed by all workers, including any subcontractors, and establishing the minimum content of said code. The Code of Conduct must be based on the guidelines contained in the LMP and the ESMF and should address, among other issues, the risk of Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) in the workplace.	Before launching the bidding process.	MoFEP
ESS 3:	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT		
3.1	HAZARDOUS MATERIALS AND HAZARDOUS WASTE MANAGEMENT Ensure full implementation of procedures / guidelines to be specified in the ESMF related to the following topics, as may be further specified in site-specific ESIAs and /or ESMPs: Management of hazardous and non-hazardous solid waste Wastewater management Sludge management (if water and sanitation works are financed) Vector and pesticide management	Same timeframe as for the preparation and implementation of the site-specific ESIAs and / or ESMPs as action 1.3 above.	MoFEP

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Resource efficiency and pollution prevention and management measures will be covered under the ESMF, ESIAs and /or ESMPs to be prepared under action 1.3 above.	Same timeframe as for the preparation and implementation of the site-specific ESIAs and / or ESMPs as indicated in action 1.3 above.	MoFEP
ESS 4:	COMMUNITY HEALTH AND SAFETY		
4.1	TRANSPORTATION, TRAFFIC AND ROAD SAFETY Adopt and implement measures and actions to assess and manage transportation, traffic and road safety risks as required in the ESMPs to be developed under action 1.3 above.	Same timeframe than for the preparation and implementation of site-specific ESIAs and / or ESMPs as indicated in action 1.3 above.	MoFEP
4.2	COMMUNITY HEALTH AND SAFETY Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from Project activities including, inter alia, risks of exposing communities to transmissible diseases like COVID—19, behaviour of Project workers, risks of labour influx, and include these measures in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Association.	Same timeframe than for the preparation and implementation of site-specific ESIAs and / or ESMPs as indicated in action 1.3 above.	MoFEP
4.3	INFRASTRUCTURE DESIGN AND SAFETY Screen all proposed Project activities taking into consideration infrastructure safety requirements. For activities situated in high-risk locations including those with risk of extreme weather or slow onset events, and where their failure or malfunction may threaten the safety of communities, one or more independent experts, separate from those responsible for design and construction, with prior experience acceptable to the Association, shall undertake a review of the engineering designs and provide independent oversight throughout Project construction, operation and decommissioning, in accordance with ESS4.	Initial review of engineering designs shall be completed prior to the issuing of bidding documents of the applicable Project activity. Independent review shall be provided throughout construction, operation and decommissioning, as agreed with the Association and in accordance with ESS4.	MoFEP

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.4	SECURITY PERSONNEL Prepare, adopt, and implement measures to reduce risks related to security personnel management consistent with the requirements of ESS4, in a manner acceptable to the Association. This shall be part of the ESMF and ESMPs.	Same timeframe as for the preparation and implementation site-specific ESIAs and / or ESMPs as indicated in action 1.3 above.	MoFEP
4.5	SEA/SH RISKS Prepare, adopt, and implement measures to reduce risks related to security personnel management consistent with the requirements of ESS4, in a manner acceptable to the Association. This shall be part of the ESMF and relevant ESMPs.	Same timeframe as for the preparation and implementation of site-specific ESIAs and / or ESMPs as indicated in action 1.3 above.	MoFEP
4.6	UNIVERSAL ACCESS Where technically and fnancially feasible, reconstruction and civil work designs shall incorporate the concept of universal access as part of works' design, as shall be described in the ESMF. This includes restoration/replacement of ramps, elevators, and toilets for persons with disabilities, and incorporation of new or additional universal access provisions whenever technically and financially feasible.	Same timeframe as for the preparation and implementation site-specific ESIAs and / or ESMPs as indicated in action 1.3 above.	MoFEP
4.7	EMERGENCY RESPONSE MEASURES Measures shall be defined in the ESMF and disseminated as part of the SEP. Measures shall be updated and detailed with site specificity in subsequent ESMPs	Same timeframe as for the preparation and implementation site-specific ESIAs and / or ESMPs as indicated in action 1.3 above.	MoFEP

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY		
5.1	RESETTLEMENT PLANS a. Prepare, consult, disclose, adopt and implement a Resettlement Policy Framework (RPF), and thereafter, if required, prepare, consult, disclose, adopt and implement the respective Resettlement Plans (RAPs) before carrying out the associated activities, consistent with ESS5, and in a manner acceptable to the Association.	a. RPF prepared, consulted, disclosed, and adopted as soon as possible, but no later than ninety (90) days after the Efective Date.	MoFEP		
	b. Until the finalisation of the project RPF, the project shall follow the screening tools, consult with stakeholders and prepare the RAPs based on the existing RPF of the Regional Disaster Vulnerability Reduction Project (P117871) and submit the screening reports and RAPs to the Association for review and approval before carrying out the associated activities, consistent with ESS5.	RAPs prepared, consulted, and submitted for the Association's approval and, if approved, disclosed, and implemented in full and completed prior to commencing Project activities where applicable, in accordance with paragraph 15 of ESS5. b. Until completion of the RPF. Any required RAPs shall be implemented in the same timeframe as a) above			
5.2	GRIEVANCE MECHANISM The grievance mechanism (GM) to address resettlement related complaints shall be described in the RPF, RAPs and SEP.	Same timeframe than action 5.1 above.	MoFEP		
ESS 6 :	ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES				

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
6.1	BIODIVERSITY RISKS AND IMPACTS a. Incorporate and implement procedures, as shall be specified in the ESMF to ensure that activities fnanced by the Project do not take place on environmentally sensitive areas, or pose a high negative impact to ecosystems, particularly in natural or critical habitats. b. In the event that a specific activity requires a Biodiversity Management Plan (BMP) and/or compensation/offset plan for loss or degradation of a natural habitat, the plan shall be developed in accordance with ESS 6 and applicable national standards, as part of the corresponding ESMP and in a manner acceptable to the Association. c. Sustainable agriculture, forestry, and fisheries management principles as part of the ESMF and included, as deemed necessary, as part of the site-specific ESIAs and/or ESMPs, in line with the requirements of ESS6 and best available practices	a. Throughout the project implementation. b. Obtain approval of the Association prior to initiating bidding processes for such activities. Thereafter, implement the BMP, as approved by the Association. c. Same timeframe as for the preparation and implementation of the site-bspecifc ESIAs and/or ESMPs, as indicated in action 1.3 above.	MOFEP MOFEP
ESS 7:	INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERY	VED TRADITIONAL LOCAL COMMUNITIES	
	andard is not currently relevant.		
ESS 8:	CULTURAL HERITAGE		
8.1	CULTURAL HERITAGE As part of site-specific ESIAs and ESMPs, carry out screening/assessment of tangible and intangible cultural heritage present in areas which may be affected by Project activities in accordance with requirements to be specified in the ESMF. If an ESIA and / or ESMP identifies the need to develop, adopt and implement a Cultural Heritage Management Plan (CHMP), in accordance with the requirements of ESS 8.	Same timeframe as for the preparation and implementation of the site-specific ESIAs and/or ESMPs, as indicated in action 1.3 above.	MoFEP

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY			
8.2	CHANCE FINDS Develop, reflect in the ESMF, adopt, and implement a Chance Finds Procedure for each project activity involving civil works as part of corresponding ESIAs and or ESMPs.	Develop Chance Finds Procedure as part of ESMF, as per timeline indicated in 1.2 above. Incorporate and implement in the site specific ESIAs and/or ESMPs, as indicated in action 1.3 above.	MoFEP			
ESS 9: FINANCIAL INTERMEDIARIES						
This standard is not currently relevant.						
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE						

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
10.1	a. Update, consult, disclose and adopt the initial draft Stakeholder Engagement Plan (SEP) prepared for the Project. Updated version of the SEP will include i) the details of the consultation, which was completed with evacuees, ii) the description of what was discussed during the government consultation during the mission; iii) completion of the table on the volcanic impact level, iv) Indicative figures of affected persons, vi) Completion of the table on vulnerable groups and their representative organizations. b. Implement the SEP. The SEP shall include stakeholder consultation and inclusion measures and participatory processes to ensure a socially inclusive and confict-b sensitive approach to reconstruction to ensure that Project activities are undertaken with equity and transparency.	a. Initial draft SEP already prepared and disclosed before the project appraisal. The SEP shall be consulted, disclosed and adopted no later than ninety (90) days after the Effective Date. b. Throughout Project implementation	Mofep
	c. Continuously update the SEP and develop specific consultation strategies before specific Project activities begin.	c. Before start of specific Project activities.	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY		
	PROJECT GRIEVANCE MECHANISM Establish, maintain and operate a grievance mechanism (GRM), as described in the SEP. The GRM shall 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.	The GRM shall be operational as early as possible, but no later than thirty (30) days after Effective Date based on the current SEP and disclosed immediately. It shall be strengthened, as necessary based on the updated SEP as early possible, but no later than ninety (90) days after the Effective Date. GRM shall be updated as necessary during project implementation. Any update of the GRM shall be submitted for approval to the Association. Submit to the Association quarterly monitoring reports on the status of the implementation of the GRM throughout Project implementation.	Mofep		
CAPACITY	CAPACITY SUPPORT (TRAINING)				

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
Develop and implement an Environmental and Social Training Plan	The first year ESTP shall be presented no	MoFEP
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organizations.		
	•	
Environmental and social management instruments for the		
Project		
Integrated waste management for hazardous and non-hazardous	the ESTP.	
waste		
Occupation Health and safety for the workforce	/	
 Infectious Disease Prevention and Response 	/	
Participatory Monitoring and Evaluation		
Climate change resilience		
Community and worker health and safety		
GBV Risk Mitigation		
Prevention and Response Measures and the development and		
implementation of GBV measures (including among contractors,		
workers and civil servants involved in the Project)		
vulnerable populations including poor, illiterate, persons with		
disabilities, sexual and gender minorities		
/		
	Develop and implement an Environmental and Social Training Plan (ESTP) acceptable to the Association to ensure the required capacity for environmental and social implementation of the Project. The plan shall include a schedule, budget, goals, and indicators. The training shall be focused on project workers, contractors, and community-based organizations. The plan may include, in particular, the following: • Environmental and social management instruments for the Project • Integrated waste management for hazardous and non-hazardous waste • Occupation Health and safety for the workforce • Infectious Disease Prevention and Response • Participatory Monitoring and Evaluation • Climate change resilience • Community and worker health and safety • GBV Risk Mitigation • Prevention and Response Measures and the development and implementation of GBV measures (including among contractors, workers and civil servants involved in the Project) • Inclusion training to ensure non-discrimination of socially	Develop and implement an Environmental and Social Training Plan (ESTP) acceptable to the Association to ensure the required capacity for environmental and social implementation of the Project. The plan shall include a schedule, budget, goals, and indicators. The training shall be focused on project workers, contractors, and community-based organizations. The plan may include, in particular, the following: Environmental and social management instruments for the Project Integrated waste management for hazardous and non-hazardous waste Occupation Health and safety for the workforce Infectious Disease Prevention and Response Participatory Monitoring and Evaluation Climate change resilience Community and worker health and safety GBV Risk Mitigation Prevention and Response Measures and the development and implementation of GBV measures (including among contractors, workers and civil servants involved in the Project) Inclusion training to ensure non-discrimination of socially vulnerable populations including poor, illiterate, persons with disabilities, sexual and gender minorities