



REPUBLIC OF MADAGASCAR  
MINISTRY OF PUBLIC WORKS / ROADS AGENCY

**CONNECTING MADAGASCAR FOR INCLUSIVE GROWTH PROJECT (P173711)**

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

Updated version on April 2024 following CERC Activation

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Madagascar (the “Recipient”) will implement the Connecting Madagascar for Inclusive Growth Project (the “Project”), through the Roads Agency (“RA” and “Project Implementing Entity” and the Project Implementation Unit for the Project (or RA PIU)), with the involvement of *inter alia*: the Ministry of Public Works (MPW), Ministry of Transport and Meteorology (MTM), the Ministry of Economy and Finance (MEF) and the Connectivity for rural livelihood improvement project’s project implementation unit (or PACT PIU) in charge of the implementation of the CERC Component as activated in April 2024, with the Recipient’s *Agence Portuaire Maritime et Fluviale* (AMPF). The International Development Association (hereinafter “the Association”) has agreed to provide financing for the Project (P173711), as set out in the referred agreement. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the CERC Component for Project referred to above.
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 and the Project 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 Recipient 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 Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, 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 Recipient through the Road Agency, Project Implementing Entity and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient designated official, Secretary general of the MPW. The Recipient shall promptly disclose the updated ESCP.

	<b>MATERIAL MEASURES AND ACTIONS</b>	<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITIES / AUTHORITIES</b>
	<b>MONITORING AND REPORTING</b>		
<b>A</b>	<b>REGULAR REPORTING</b>		
	Prepare and submit to the Association regular monitoring reports on the state of compliance with the actions set out in the ESCP and including, without limitation the implementation of (a) the environmental, social, health and safety (ESHS) performance of the Project in accordance with the ESMF, RF, ESIA's and all derived plans and instruments, (b) the Stakeholder Engagement Plan (SEP), (c) the Labor Management Procedures (LMP), (d) the Grievance Mechanism (GM) and (e) the GBV/SEA-SH Action Plan.	Submit reports to the Association every six months during Project implementation, starting six months after the Effective Date and to be maintained throughout Project implementation.	<ul style="list-style-type: none"> <li>- Project Implementation Unit (RA-PIU)</li> <li>- PACT PIU and AMPF for the CERC Component</li> </ul>
<b>B</b>	<b>INCIDENTS AND ACCIDENTS</b>		
	<p>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), and accidents that result in death, serious or multiple injury. Provide sufficient detail regarding the scope, severity, and possible causes of 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/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association.</p>	<ul style="list-style-type: none"> <li>- Project Implementation Unit (RA-PIU)</li> <li>- PACT PIU for the CERC Component</li> </ul>
<b>C</b>	<b>CONTRACTORS' MONTHLY REPORTS</b>		
	Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.	Contractor Monthly reports to be submitted to the PIU, and to the Association upon request.	<ul style="list-style-type: none"> <li>- Project Implementation Unit (RA-PIU)</li> <li>- PACT PIU for the CERC Component</li> </ul>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
<b>1.1</b>	<b>ORGANIZATIONAL STRUCTURE</b>		
	<p>(1) Establish and maintain an organizational structure, the RA-PIU and PACT-PIU, with qualified staff and resources to support environmental and social risk management, with qualifications acceptable to the Association, including an environmental specialist, a social specialist, and GBV/SEA-SH specialist. They shall ensure the application of the provisions made in this document and all environmental and social (E&amp;S) documents prepared within the framework of the Project.</p> <p>(2) Mobilize additional staff (consultants) who will support the implementation of E&amp;S aspects for short- or long-term assignments in accordance with the assessment or institutional needs.</p>	<ul style="list-style-type: none"> <li>- The environment specialist, the social specialist, and the GBV/SEA-SH specialist within the RA PIU and within PACT PIU are already operational. The organizational structure to support effective environmental and social risk management shall be maintained during the implementation of the Project and its CERC component.</li> <li>- Submit the position ToR to the Association for any additional staff need prior to launch the hiring process</li> </ul>	<ul style="list-style-type: none"> <li>- Project Implementation Unit (RA-PIU)</li> <li>- PACT PIU for the CERC Component</li> </ul>
<b>1.2</b>	<b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b>		

	<b>MATERIAL MEASURES AND ACTIONS</b>	<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITIES / AUTHORITIES</b>
	<p>(1) The Project has prepared and disclosed the Environmental and Social Management Framework (ESMF) as well as a standalone CERC-ESMF that addresses all E&amp;S issues associated with the project, including E&amp;S impacts from ancillary works, accommodation camps, access roads. Update as necessary and disclose the updated document in accordance with the provisions of ESS 1, and in a manner acceptable to the Association.</p>	<p>The ESMF has been disclosed on January 31, 2022 and shall thereafter be implemented throughout Project implementation.</p> <p>The CERC-ESMF has been prepared as a condition of withdrawal of funds under the CERC under Section I.G. of Schedule 2 of the Financing Agreement for the Project, and disclosed on 04/23/2024. It shall thereafter be implemented throughout implementation of the CERC component.</p> <p>Any proposed updates to the ESMF shall be submitted to the Association for approval prior to implementation. Once approved, the ESMF will be implemented throughout the implementation of the Project.</p>	<ul style="list-style-type: none"> <li>- Project Implementation Unit (RA-PIU)</li> <li>- PACT PIU for the CERC Component</li> </ul>
	<p>(2) Carry out environmental and social studies for all sub-projects, including among others Environmental and Social Impact Assessments (ESIA), and Environmental and Social Management Plans (ESMP) in accordance with the ESMF, particularly to ensure that the final ESIA / ESMP addresses the cumulative impacts associated with each project component.</p> <p>For parent project</p> <ul style="list-style-type: none"> <li>- ESIA and ESMP related to the rehabilitation of RN 10 and RN 31 approved and disclosed.</li> <li>- ESIA and ESMP related to the rehabilitation of priority national roads</li> <li>- ESIA and ESMP related to the rehabilitation of feeder regional and communal roads</li> </ul> <p>For CERC Component</p> <ul style="list-style-type: none"> <li>- C-ESMP related to the emergency rehabilitation of RN 6</li> <li>- C-ESMP related to the emergency rehabilitation of RN 4</li> <li>- C-ESMP related to the emergency rehabilitation of Mahajanga Port</li> </ul> <p>Prepare ESIA/ESMP reports, update if necessary, and submit to the Association for approval, publish and implement in a manner acceptable to the Association.</p> <p>If the concerned ESIA report considers that a labor influx management plan (LIMP) and Worker Accommodation Plan (WAP) are necessary, within the C-ESMP, as needed</p>	<p>The ESIA / ESMP for RN 31 and RN10 (Section 3-4) WAP have been approved and disclosed in the country and at WB External website respectively on January 30, 2024 and April 10, 2024.</p> <p>The C-ESMPs for the CERC component will be submitted to the Association for approval and shall be disclosed before the launch of the rehabilitation works.</p> <p>All subsequent updated versions of the documents shall be submitted for approval before their implementation. Once approved, the instruments shall be re-disclosed and implemented throughout the execution of the Project.</p>	<ul style="list-style-type: none"> <li>- Project Implementation Unit (RA-PIU)</li> <li>- PACT PIU for the CERC Component</li> </ul>
	<p>(3) Carry out specific environmental and social assessments required for each planned activity (Technical and public evaluation by the National Office for the Environment (ONE), Screening, environmental and social management plans, social impact assessments) in accordance with the ESMF, ESIA of the Project.</p> <p>Ensure that Permits and environmental specifications are obtained for the whole or one of the components/activities of the Project in accordance with the effective legal framework and ESS1, and in a manner satisfactory to the Association.</p>	<p>Submit ESIA/ESMP to ONE no later than 3 months after both MPW and Association clearance.</p> <p>Conduct environmental and social assessments in the concerned sites before the execution the civil works.</p> <p>Any identified risk management plan must be prepared and implemented before starting the works by the contractor.</p>	<ul style="list-style-type: none"> <li>- Project Implementation Unit (RA-PIU)</li> <li>- PACT PIU for the CERC Component</li> </ul>
1.3	<b>MANAGEMENT OF CONTRACTORS</b>		

	<b>MATERIAL MEASURES AND ACTIONS</b>	<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITIES / AUTHORITIES</b>
	(1) Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.	As part of ToR and bidding documents and respective contracts Supervise contractors throughout Project implementation.	- Project Implementation Unit (RA-PIU) - PACT PIU for the CERC Component
	(2) Develop, submit for approval and implement of the following procedures applicable to contractors, subcontractors and the engineer: C-ESMP, which inter alia present operations phase E&S management plans for the subprojects in accordance with the ESMF, RF, ESIA/ESMP, RP, prepared by the Contractor, Hygiene – Health – Safety and Environment Plan (HSE Plan), Codes of Conduct, Grievance Mechanism, Social commitments on child labor and other elements provided in the GBV Action Plan.	Prior to the start of the civil engineering works by the Contractor. Once approved, the instruments will be implemented throughout Project implementation. Supervise contractors throughout Project implementation.	- Project Implementation Unit (RA-PIU) - PACT PIU for the CERC Component
1.4	<b>TECHNICAL ASSISTANCE</b> Ensure that the consultancies, studies (including feasibility studies, if applicable), 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 are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.	Throughout Project implementation.	- Project Implementation Unit (RA-PIU) - PACT PIU for the CERC Component
1.5	<b>CONTINGENT EMERGENCY RESPONSE COMPONENT</b> 1. Adopt the CERC manual and the CERC-ESMF in form and substance acceptable to the Association to ensure that the CERC Manual as specified the Financing Agreement includes the results of the ESHS assessment and management arrangements and required management instruments for CERC activities. 2. Prepare, disclose, consult, and adopt a C-ESMP for each activity under CERC component of the Project, in accordance with CERC Manual and CERC-ESMF	The CERC-ESMF has been prepared as a condition of withdrawal of funds under the CERC under Section I.G. of Schedule 2 of the Financing Agreement for the Project and disclosed on 04/23/2024. The C-ESMP RN4- RN 6 and Majunga Port rehabilitation shall be prepared, disclosed, consulted, and thereafter adopted before the carrying out of the relevant Project activities under CERC component. The C-ESMP shall be implemented in accordance with their terms, throughout Project implementation.	- Project Implementation Unit (RA-PIU) - PACT PIU for the CERC Component
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<b>LABOR MANAGEMENT PROCEDURES</b>		
	(1) A LMP has been prepared by the Project (including the Codes of Conduct establishing clauses and sanctions against GBV/SEA/SH acts required for all project workers namely Project Implementation Unit, contractors and subcontractors and their workers) for the entire Project and the CERC activities. Update if necessary and disclose the updated final validated version. Implement as deemed acceptable for the Association according to disposition in the ESS2.	LMP has been disclosed on January 31, 2022. It will be applied throughout the Project implementation including CERC activities. Any subsequent updates to the LMP shall be submitted to the Association for approval, and to be re-disclosed before implementation.	- Project Implementation Unit (RA-PIU) - PACT PIU for the CERC Component

	<b>MATERIAL MEASURES AND ACTIONS</b>	<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITIES / AUTHORITIES</b>
	(2) Ensure the signing of contracts, including the Codes of Conduct, with all Project Workers (Direct workers, contracted workers, primary supply workers, community workers...) in accordance with the LMP guidelines.	Prior to engaging any Project workers	Project Implementation Unit (RA-PIU) PACT PIU for the CERC Component
	(3) Ensure the signing of contracts and Codes of Conduct by the contractors, in accordance with LMP guidelines.	Prior to engaging firms and subcontractors for the Project	
<b>2.2</b>	<b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b>		
	Establish and operate a Grievance Mechanism (GM) for any matter related to work or employment under the Project, as described in the LMP and in accordance with ESS 2 for the Project (including CERC activities) Implementation Units, Contractors and subcontractors.	Grievance mechanism shall be operational prior to the recruitment of any Project workers and to be maintained and implemented throughout the Project implementation period.	- Project Implementation Unit (RA-PIU) - PACT PIU for the CERC Component
<b>EES 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
<b>3.1. RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
	1. Incorporate resource efficiency and pollution prevention and management measures in the ESIA/ESMP and C-ESMP to be prepared under action 1.2 (2) above.	Same timeframe as for the adoption and implementation of ESIA/ESMP  Clearance of the C-ESMPs shall be a prerequisite for the start of all civil works.	- Project Implementation Unit (RA-PIU) - PACT PIU for the CERC Component
<b>3.2</b>	<b>WASTE AND HAZARDOUS MATERIALS MANAGEMENT</b>		
	Adopt and implement a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes, consistent with ESS3, as part of the ESIA/ESMP and C-ESMP to be prepared under action 1.2 (2) above.	Same timeframe as for the adoption and implementation of ESIA/ESMP  Clearance of the C-ESMPs shall be a prerequisite for the start of all civil works.	- Project Implementation Unit (RA-PIU) - PACT PIU for the CERC Component
<b>EES 4: COMMUNITY HEALTH AND SAFETY</b>			
<b>4.1</b>	<b>TRAFFIC AND ROAD SAFETY</b>		
	Incorporate measures to manage traffic and road safety risks as required in the ESIA/ESMP and C-ESMP to be prepared under action 1.2 (2) above.	Same timeframe as for the adoption and implementation of ESIA/ESMP  Clearance by the Association of the C-ESMPs shall be a prerequisite for the start of all civil works.	- Project Implementation Unit (RA-PIU) - PACT PIU for the CERC Component
<b>4.2</b>	<b>COMMUNITY HEALTH AND SAFETY</b>		

	<b>MATERIAL MEASURES AND ACTIONS</b>	<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITIES / AUTHORITIES</b>
	Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia Project worker behaviour, labor influx, risks of SEA/SH, risks related to staff safety, response to emergency situations, and include mitigation measures in the ESIA/ESMP and C-ESMP to be prepared under action 1.2 (2) above, in accordance with the ESMF.	Same timeframe as for the adoption and implementation of ESIA/ESMP  Clearance of the C-ESMPs shall be a prerequisite for the start of all civil works.	- Project Implementation Unit (RA-PIU) - PACT PIU for the CERC Component
<b>4.3</b>	<b>SEA AND SH RISKS</b>		
	(1) The Project has developed the SEA-SH Action Plan for the entire Project as part as the ESMF. Adopt and implement the /SEA-SH Action Plan in accordance with ESS4, as part of the ESIA/ESMP and C-ESMP to be prepared under action 1.2 (2) above.	- The SEA-SH action plan has been disclosed on January 31, 2022 and will be applied throughout the Project implementation, including CERC activities  - All subsequent version and update to the action plan should be submitted to the Association for clearance before implementation. Once approved, the SEA-SH Action Plan is implemented throughout Project implementation with the same timeframe as for the adoption and implementation of ESIA/ESMP	- Project Implementation Unit (RA-PIU) - PACT PIU for the CERC Component
	(2) Ensure that all contractual and procurement documents (ToR, bidding documents, workers' contracts) include the Codes of Conduct and provisions for the prevention and fight against and response to GBV/SEA-SH.	(2) as part of the preparation of the procurement documents and prior to call of tender	
	(3) Ensure the implementation of an adequate support and referral system for GBV survivors in the Project area in line with the national and international good practices and the GBV Action Plan	(3) GBV support system shall be in place prior the installation of any firm in each sub-project area.	
4.4.	<b>SECURITY MANAGEMENT:</b> Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, as set out in the ESMP and in the Security Management Plan guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.	Prior to engaging security personnel and thereafter implemented throughout Project implementation	- Project Implementation Unit (RA-PIU) - PACT PIU for the CERC Component
4.5	<b>INVOLVEMENT OF THE MILITARY</b>  a) Ensure the following measures are carried out before deploying the Recipient's police/military/Gendarme in the implementation of Project activities for the provision of security to Project workers, sites and/or assets, consistent with the ESSs:  b) Assess and implement measures to manage the security risks of engaging the military/Gendarme, as set out in the ESIA and ESMP, guided by the principles of	Carry out a, b), c), and d) before deploying police/military/Gendarme under the Project and implement throughout Project implementation.	

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITIES / AUTHORITIES
	<p>proportionality and GIIP, and by applicable law, in relation to screening, hiring, rules of conduct, training, equipping, and monitoring of such military;</p> <p>c) Adopt and implement standards, protocols, and codes of conduct for the selection and assignment of military/Gendarme to the Project, and screen such military to verify that they have not engaged in past unlawful or abusive behavior, including sexual exploitation and abuse (SEA), sexual harassment (SH) or excessive use of force;</p> <p>d) Enter into a memorandum of understanding (MoU), with the ministry in control of military/Gendarme as relevant, setting out the arrangements for the engagement of the military in the Project, including the relevant actions and measures set out in this ESCP;</p> <p>e) Provide adequate instruction and training to the Recipient's police/military/Gendarme, prior to deployment and on a regular basis, on the use of force and appropriate conduct (including in relation to civilian-military engagement, SEA and SH, and other relevant areas), as set out in the ESMP, Security Management Plan, MoU, as relevant;</p> <p>f) Ensure that the stakeholder engagement activities under the Stakeholder Engagement Plan (SEP) include communication on the involvement of Recipient's police/military/Gendarme] in the Project;</p> <p>g) Ensure that any concerns or grievances regarding the conduct of [name military] are received, monitored, and documented (taking into account the need to protect confidentiality) by the Project's grievance mechanism (see action 10.2 below), which shall facilitate its resolution, in accordance with ESS4 and ESS10. Notify Association after receiving the concern or grievance, as set out under action B above; and</p> <p>h) Where the Association so request in writing, after consultation with the [Borrower/Recipient]: (i) promptly appoint a third-party monitor consultant, with terms of reference, qualifications and experience acceptable to the Association, to visit and monitor the Project area where Recipient's police/military/Gendarme] are deployed, collect relevant data and communicate with Project stakeholders and beneficiaries; (ii) require the third-party monitor consultant to prepare and submit monitoring reports, which shall be promptly made available to and discussed with the Association; and (iii) promptly take any actions, as may be requested by the Association upon its review of the third-party monitor consultant reports.</p>	<p>e) and f) as set out under actions 10.1 and 10.2 respectively. Notify the Association after receiving the concern or grievance in the timeframe specified in action B above.</p> <p>g) within the timeframes requested by the Association.</p>	
4.6	<b>MANAGEMENT OF CONTRACTORS</b>		
	<p>Management of Contractors and include the following: The minimum E&amp;S Clauses to be included in the bidding documents should cover: (i) Contractor past performance on ESHS aspects including sexual, exploitation and abuse and gender based violence; (ii) ESHS staff with the contractor; (iii) Performance security; (iv) Mitigation measures to address construction impacts; (v) Payments for implementation of ESHS measures; (vi) Code of conduct of Contractor's personnel addressing SEA/SH behaviors and sanctions in case of non-compliance, regular training for workers on SEA/SH risks, and procedures to handle SEA/SH incidents in line with those</p>	During the preparation of bidding document	<ul style="list-style-type: none"> <li>- Project Implementation Unit (RA-PIU)</li> <li>- PACT PIU for the CERC Component</li> </ul>



	<b>MATERIAL MEASURES AND ACTIONS</b>	<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITIES / AUTHORITIES</b>
	established by the project; (vii) Management Strategies and Implementation Plan to manage the ESHS risks.		
<b>ESS 5: LAND ACQUISITION, LAND USE RESTRICTIONS AND INVOLUNTARY RESETTLEMENT</b>			
<b>5.1</b>	<b>RESETTLEMENT PLANS</b>		
	(1) The Project has prepared the Resettlement Framework (RF). Update as necessary and disclose the updated document in accordance with the provisions of ESS 5, and in a manner acceptable to the Association.	The RF has been disclosed on January 31, 2022 and will be applied and maintained throughout the implementation of the Project.  Any subsequent versions of the RF update must be submitted to the Association for approval prior to implementation. Once approved, the updated RF is to be implemented throughout the execution of the Project.	- Project Implementation Unit (RA-PIU)  - PACT PIU for the CERC Component
	(2) Prepare, disclose, consult, adopt Resettlement Plans (RP) (including Livelihood restoration plan) as necessary, in accordance with the requirements of the Resettlement Framework (RF) itself established in accordance with the national provisions in force and the provisions of ESS 5, and in a manner acceptable to the Association:  <ul style="list-style-type: none"> <li>- Resettlement Plan for RNT31</li> <li>- Resettlement Plan for RNS10</li> <li>- Resettlement Plan for feeder regional and communal roads.</li> </ul>	Resettlement Plan for RNT31 and Resettlement Plan for RNS10 (section 3-4) have been approved and disclosed in the country and at WB External website respectively on November 11, 2023 and April 19, 2024.  All RP will be submitted to the Association for approval and shall be disclosed before the launch of the call for tenders for the implementation of the related activities.  All RPs must be disseminated locally and, on the Association, and Project websites. The approval of RPs will be a prerequisite for disbursement/call for bids of the respective subproject	- Project Implementation Unit (RA-PIU)  - PACT PIU for the CERC Component
	(3) Develop, and update if necessary "an Expropriation and Compensation Manual" applicable to the entire Project in accordance with ESS5 and the RF	Manual to be developed, to be sent for validation by the Association no later than 3 months after the effectiveness of the Project	- Project Implementation Unit (RA-PIU)  - PACT PIU for the CERC Component

	<b>MATERIAL MEASURES AND ACTIONS</b>	<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITIES / AUTHORITIES</b>
	<p>(4) Develop separate monitoring reports of RP implementation, for sub-projects requiring land acquisition, disruption of a source of income. Submit these reports to the Association for approval during RP implementation. Develop a final implementation report documenting the full implementation of the RP to the satisfaction of the Association prior to the start of work.</p> <p>The PIU will include a summary of RP progress reports in the quarterly reports to be submitted to the association per item A above prior to the start of work.</p>	<p>Monthly progress report of the RP to be sent to the PIU and the Association upon request,</p> <p>Mid-term report, with the evidence documents in the appendix must be sent to the Association before the closure of the RP under consideration.</p> <p>Final implementation report to be sent to the Association for approval prior to start physical works for the respective subproject</p>	<ul style="list-style-type: none"> <li>- Project Implementation Unit (RA-PIU)</li> <li>- PACT PIU for the CERC Component</li> </ul>
<b>5.2</b>	<b>GRIEVANCE MECHANISM</b>		
	An overall GM is developed for the Project as a whole in the ESMF/RF/SEP. However, when developing any RP, ensure that the GM into the RP is in compliance with GM developed into RF/SEP.	During development of RPs	<ul style="list-style-type: none"> <li>- Project Implementation Unit (RA-PIU)</li> <li>- PACT PIU for the CERC Component</li> </ul>
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
<b>6.1</b>	<b>BIODIVERSITY RISKS AND IMPACTS</b>		
	<p>1. Ensure that biodiversity and natural habitat screening and assessment process for Project activities to ensure that impacts on biodiversity are identified and minimized in all ESIA/ESMP in accordance with the ESMF, and as part of the ESIA/ESMP and C-ESMP to be prepared under action 1.2 (2) above.</p> <p>2. Prepare, disclose, consult upon and adopt specific ESIA/ESMPs in accordance with the measures described in the ESMF for substantial risk activities to avoid and/or minimize potential impacts from Project activities that will be conducted in the vicinity of these habitat types. These ESMPs shall be developed in accordance with the provisions of ESS 6, in a manner acceptable to the Association.</p>	<p>During the preparation of ESIA/ESMPs.</p> <p>As indicated in 1.2, submit for the Association's prior approval prior to civil works in or near the site that may affect natural or critical habitats.</p> <p>Once validated, the ESIA/ESMP shall be implemented throughout Project implementation.</p>	<ul style="list-style-type: none"> <li>- Project Implementation Unit (RA-PIU)</li> <li>- PACT PIU for the CERC Component</li> </ul>
<b>ESS 7: INDIGENOUS PERSONS / TRADITIONAL LOCAL COMMUNITIES OF HISTORICALLY DISADVANTAGED SUB-SAHARAN AFRICA</b>			
	<b>NOT RELEVANT</b>		
<b>ESS 8: CULTURAL HERITAGE</b>			
<b>8.1</b>	<b>CHANCE FIND PROCEDURE</b>		

	<b>MATERIAL MEASURES AND ACTIONS</b>	<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITIES / AUTHORITIES</b>
	<p>(1) Ensure that “chance-find” clauses as defined in the Project ESMF shall be included in all works contracts, even in cases where the probability of discovery is low.</p> <p>2. PIU will include chance find procedures in all works contracts and require each contractor to include and implement measures to manage chance finds in their Project approved C-ESMP, in a manner acceptable to the Association. The Contractor ESMP is a complement to the ESMP prepared by the PIU.</p> <p>(3) Apply the “chance-find” procedures described in the ESMF, in accordance with ESS8.</p>	<p>(1) Before the signing of each works contract with the awarded works Contractor.</p> <p>(2) Include CFP in bidding documents; screen site and prepare CHM prior to start of work where needed; in case of a chance find during construction, suspend works and restart only after the respective management plan/procedure is in place</p> <p>(3) Procedures applicable throughout the implementation of the work and continuously until the end of Project.</p>	<ul style="list-style-type: none"> <li>- Project Implementation Unit (RA-PIU)</li> <li>- PACT PIU for the CERC Component</li> </ul>
8.2	<b>CULTURAL HERITAGE</b>		
	<p>1. Develop a specific communication and awareness strategy, considering the procedures described in the ESMF, to avoid and/or mitigate the potential impacts of the implementation of Project activities on cultural heritage of the concerned areas (Based on past experiences, these can include sacred trees or rocks, among others.)</p> <p>(2) Develop and implement, if necessary, a Cultural Heritage Management Plan, in case of a chance discovery, in accordance with the provisions of ESS8, and in a manner acceptable to the Association</p>	Before the start of relevant civil works, and throughout Project implementation thereafter.	<ul style="list-style-type: none"> <li>- Project Implementation Unit (RA-PIU)</li> <li>- PACT PIU for the CERC Component</li> </ul>
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
	<b>NOT RELEVANT</b>		
<b>ESS 10: STAKEHOLDERS ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
<b>10.1 PREPARATION AND IMPLEMENTATION OF THE STAKEHOLDER ENGAGEMENT PLAN (SEP)</b>			
	The Project has updated a SEP to cover the CERC component, consistent with ESS10, which 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.	<p>The original SEP has been disclosed on January 31, 2022. The updated SEP including CERC activities has been prepared and shall be applied and maintained throughout the implementation of the Project.</p> <p>Any subsequent updates to this SEP shall be submitted to the Association for clearance before implementation. Once cleared, the SEP is to be implemented throughout the Project implementation.</p>	<ul style="list-style-type: none"> <li>- Project Implementation Unit (RA-PIU)</li> <li>- PACT PIU for the CERC Component</li> </ul>
10.2	<b>GRIEVANCE MECHANISM</b>		

	<b>MATERIAL MEASURES AND ACTIONS</b>	<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITIES / AUTHORITIES</b>
	The Project GM was developed under the SEP. This GM shall have the capacity to handle SEA/SH allegations. Adopt and implement the (GM) as described in the Stakeholder Engagement Plan (SEP)	GM to be applied and maintained throughout the implementation of the Project.  As needed, the GM to be updated periodically: any update of the GM shall be submitted to the Association for approval prior to implementation. Once approved, ensure operationalization and monitoring throughout the implementation of the Project.	Project Implementation Unit (RA-PIU)  PACT PIU for the CERC Component
<b>CAPACITY SUPPORT (TRAINING)</b>			
<b>CS1</b>	<b>Themes within the framework of workers' capacity building</b>		
	<p>Organize and train direct Project workers to increase their understanding of the potential risks and impacts associated with Project activities and their roles and responsibilities in assessing and managing those risks and impacts.</p> <p>Also ensure that contract workers are trained to be more aware of the potential environmental and social risks and impacts associated with Project activities and to be aware of measures to mitigate adverse effects on working conditions.</p> <p>For direct workers, training will cover the following topics (non-exhaustive list):</p> <ul style="list-style-type: none"> <li>- ESF, ESS and World Bank Group EHS Guidelines</li> <li>- Stakeholder Engagement</li> <li>- Health and safety of workers and communities</li> <li>- GBV and SEA/SH risk mitigation</li> <li>- Emergency preparedness and response</li> <li>- Training on inclusion of vulnerable and disadvantaged groups in the consultation process, GM, Project mitigation and benefits</li> <li>- Grievance mechanism</li> <li>- Development, implementation, monitoring and reporting in accordance with the LMP, ESMF, RF, ESCP</li> <li>- Sensitization, awareness and prevention on infectious and sexually transmitted infections: COVID-19, HIV/AIDS, ...</li> <li>- Raising awareness on GBV including SEA-HS and child protection</li> <li>- Raising awareness on barrier measures against the spread of Covid-19</li> <li>- Implementation of RP</li> </ul>	<p>When RA-PIU E&amp;S specialists and GBV specialist are hired.</p> <p>Before the start of civil works and, as needed, during the implementation of the Project in accordance with a Capacity building Plan developed by the Project implementation Unit</p>	<p>Project Implementation Unit (RA-PIU)</p> <p>PACT PIU for the CERC Component</p>
<b>CS2</b>	<b>Themes in the framework of capacity building of work an engineering Contractors (non-exhaustive list)</b>		
	<p>For contract workers, training will include (but not be limited to):</p> <ul style="list-style-type: none"> <li>- Introduction to the ESF, ESS and World Bank Group EHS Guidelines</li> <li>- Implementation of ESMPs, including:</li> </ul>	<p>Before the start of the civil engineering works, upon notification of the works Contractor</p> <p>Specific training</p>	<p>Project Implementation Unit (RA-PIU)</p>

	<b>MATERIAL MEASURES AND ACTIONS</b>	<b>TIMEFRAME</b>	<b>RESPONSIBLE ENTITIES / AUTHORITIES</b>
	<ul style="list-style-type: none"> <li>- Health and safety of workers and communities</li> <li>- GBV awareness, control and prevention</li> <li>- Emergency preparedness and response</li> <li>- Complaints management mechanism</li> <li>- Development, implementation, monitoring and reporting in accordance with the LMP, ESMPs</li> <li>- Sensitization, awareness and prevention of sexually transmitted infections: HIV/AIDS ...</li> <li>- Sensitization on measures against the spread and control of Covid-19 and other infectious diseases</li> </ul>	Regular recycling	PACT PIU for the CERC Component