

**UNION OF THE COMOROS**

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**Ministry of Maritime and Air Transport**  
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**Comoros Inter-Island Connectivity Project  
(PICMC)**

**P173114**

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

**Février 23, 2022  
Draft for Negotiation**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Union of Comoros (**the Recipient**) plans to implement the **Comoros Inter-Island Connectivity Project (PICMC or the Project)** with the involvement of the Ministry of Transport (Ministère des Transports Maritime et Aérien). The International Development Association (**IDA or the Association**) has agreed to provide financing for the Project.
2. The Recipient shall implement measures and actions to ensure that the Project is implemented in compliance with the World Bank's Environment and Social Standards (ESSs). This Environmental and Social Commitment Plan (ESCP) sets out measures and actions, any specific documents or plans, and the timing of each of these.
3. The Recipient shall also comply with the provisions of any other environmental and social (E&S) documents required under the Environmental and Social Framework (ESF), and referred to in this ESCP, as well as the timetables indicated in these E&S documents. These documents include:
  - Environment and Social Management Framework (ESMF) of **Component 1.2**. "Improvement of secondary ports" and **Component 2.2**. « Vessel renewal program »;
  - Resettlement Framework Policy for Component 1.1. "Infrastructure improvement of Port Fomboni (Boingoma), **Component 1.2**. "Improvement of secondary ports" and Component **2.2**. « Vessel renewal program »;
  - Risk Assessment and Action Plan concerning Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) for all components;
  - Stakeholder Engagement Plan (SEP) including the Grievance Redress Mechanism (GRM) for all components,
  - Labor Management Procedures (LMP) for all components.

Other documents will be developed as needed during the implementation of the project: Environment and Social Impact Assessment including Environmental and Social Management Plans (ESMP) for Component 1.2. "Improvement of secondary ports" and Resettlement Action Plan including Livelihoods Improvement Plans for Component 1.1. "Infrastructure improvement of Port Fomboni (Boingoma), **Component 1.2**. "Improvement of secondary ports" and Component 2.2. « Vessel renewal program ».

4. The Recipient will be responsible for ensuring compliance with all the requirements of the ESCP, even where the implementation of certain measures and actions is conducted by the Ministry mentioned in paragraph 1 above in collaboration with the Ministry of Environment and Forestry. In addition, the Beneficiary is required to ensure coherence between the requirements of the ESCP and the activities planned in Component 3 "Implementation support and capacity building" which aims at financing technical assistance to improve the institutional framework and capacity of the Government to implement inter-island maritime policies properly, including port management.
5. The implementation of the 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, and the Association will monitor and assess progress and completion of the measures and concrete actions throughout implementation of the Project.

6. As agreed by the Association and the Recipient, this ESCP may be revised from time to time during the implementation of the Project, to reflect the adaptive management of changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such situations, the Recipient, through the Project Implementation Unit (PIU), will agree on these changes with the Association and revise the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through an exchange of letters signed between the Association and the Recipient. The Recipient shall promptly disclose the revised ESCP. 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 necessary, to implement actions and measures to address such risks and impacts, which may include those related to health, safety, influx of labour, degradation of natural resources and pollution of the physical environment (soil, air, surface and underground water, noise on construction sites), disruption of free movement of people and goods, social conflicts and health and safety of the population (outbreak of diseases among the population and workers, accidents related to site activities, health risks related to poor management of shipyard waste, loss of land and resettlement, Gender-Based Violence and risks related to child labour).
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 necessary, to implement actions and measures to address such risks and impacts which may include those related to health, safety, influx of labor, degradation of natural resources and pollution of the physical environment (soil, air, surface and underground water, noise on construction sites), disruption of free movement of people and goods, social conflicts and health and safety of the population (outbreak of diseases among the population and workers, accidents related to site activities, health risks related to poor management of shipyard waste, loss of land and resettlement, Gender-Based Violence and risks related to child labor).

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>PERIODIC REPORTS</b></p> <p>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, the preparation and implementation of environmental and social documents required under the ESCP, stakeholder engagement activities and the functioning of the Grievance Redress Mechanism(s) including those related to resettlement and cases of Sexual Exploitation and Abuse/Gender Based Violence/Sexual Health (SEA/GBV/SH), Violence Against Children (VAW/CV).</p>	<p>Each quarter, at the latest on the 5th of the month following the quarter in question, throughout the implementation of the Project and in coordination with the report on the status and results of the Project.</p> <p>Compilation shall be sent to the Association no later than the 10th of January following the year in question</p>	PIU PICMC
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <ol style="list-style-type: none"> <li>1. Notify the Association of all incidents or accidents, related to the Project, which have, or are likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those related to occupational exclusion or discrimination against certain individuals or groups of individuals and any Project-related allegation of SEA/GBV/SH in relation to the Project.</li> <li>2. The notification shall provide sufficient detail regarding the incident(s) or accident(s) in question, including the immediate and root causes, and shall indicate immediate measures taken or that are planned to be taken to address the incident(s) or accident(s); it shall also include information provided by any supplier/provider or oversight entity, as appropriate. Subsequently, as per the Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</li> <li>3. The Recipient shall require suppliers and service providers to notify it of accidents and incidents in accordance with this ESCP, including through a model incident or accident notification form.</li> </ol>	<ol style="list-style-type: none"> <li>1. Notifications of incidents and accidents shall be made within 48 hours of first becoming aware of the incident or accident.</li> <li>2. A detailed report on specific information, including causes, consequences, measures taken, etc., shall be submitted to the Association within a maximum of one week after first becoming aware of the incident or accident.</li> <li>3. These notification and reporting requirements apply throughout project implementation.</li> </ol>	PIU PICMC
C	<p><b>MONTHLY REPORTS FROM SUPPLIERS AND PROVIDERS</b></p> <p>In the framework of civil works contracts or other awarded on the basis of the Association's standard procurement files, require suppliers and service providers to provide monthly monitoring/tracking reports to the PIU. These reports shall be transmitted to the Association by the Recipient, upon request.</p>	Monthly and throughout the implementation of the Project.	PIU PICMC
<b>ESS1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <ol style="list-style-type: none"> <li>1. Establish and maintain an organizational structure with qualified staff and appropriate resources to support environmental and social risk management. To this end, the PIU shall mobilize qualified environmental, social and gender/GBV/SEA/SH specialists to manage environmental and social risks, including Environmental and Social Specialists who will ensure the implementation and monitoring of measures included in the instruments.</li> <li>2. Rely on the Authority of Environment and Forests (DGEF) and its island entities, NGOs, companies and engineering and control offices, and municipalities for the monitoring and evaluation of environmental and social measures.</li> </ol>	<ol style="list-style-type: none"> <li>1. An organizational structure comprising three (3) specialists (one environmental, one social and one gender/GBV/SEA/SH) shall be established within a maximum of 90 days after the Project Effective Date.</li> <li>2. The organizational structure, including the environmental, social and gender SEA/GBV/SH specialists shall be maintained throughout the implementation of the Project.</li> </ol>	PMU PICMC
1.2	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b></p> <p>Adopt, disclose and implement the Environmental and Social Management Framework (ESMF) specific to "Vessel Renewal Program" prepared for the Project, in a manner acceptable to the Association.</p>	<p>ESMF for Component 2 "Maritime Safety and Vessel Renewal Program" disclosed before the appraisal of the Project</p> <p>ESMF shall be implemented throughout the duration of the Project.</p>	PIU PICMC

<p>1.3</p>	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>The Borrower shall develop, adopt, disclose and implement the following tools and instruments:</p> <ol style="list-style-type: none"> <li>1. Environmental and Social Management Framework (ESMF) for Component 1.2. "Improvement of secondary ports" and Component 2.2. "Vessel renewal program"; Action Plan for the Prevention, Mitigation and Response to gender-based violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH); Stakeholder Engagement Plan (SEP) including the project's Grievance Redress Mechanism (GRM); Labor Management Procedures (LMP); Resettlement Policy Framework; These documents shall be prepared in parallel of technical studies and approved by the Association</li> <li>2. A Final Environmental and Social Impact Assessment (ESIA) including Environmental and Social Management System for the infrastructure improvement of Port Fomboni (Boingoma), Component 1.1 "Infrastructure improvement of Port Fomboni " shall be prepared and approved by the Association</li> <li>3. The Final Environmental and Social Impact Assessments (ESIAs) including Environmental and Social Management Systems (ESMPs) for the three secondary ports (Chindini, Hoani and Vassy) shall be prepared and approved by the Association;</li> <li>4. Resettlement Action Plans (RAPs) and Livelihood Restoration Plans (LRPs) for the Component 1.1 "Infrastructure improvement of Port Fomboni "and the Component 1.2. "Improvement of secondary ports" and Component 2.2. "Vessel renewal program" shall be prepared by the Project, approved by the Association and implemented by the Project</li> </ol>	<ol style="list-style-type: none"> <li>1. The final versions of the GBV Plan, SEP, RPF, and LMP shall be finalized, consulted upon and disclosed prior to Appraisal. The and the ESIA for the infrastructure improvement of Port Boingoma and ESMF have been disclosed in the Country on January 8, 2022 and to WB external website on January 20, 2022. These instruments shall be implemented throughout Project implementation.</li> <li>2. Final version of the ESIA shall be approved and disclosed prior to issuing the bidding documents for procurement of Construction Contractor(s), and thereafter implemented throughout Project implementation.</li> <li>3. Final versions of the ESIAs shall be approved and disclosed prior to issuing the bidding documents for procurement of Construction Contractor(s), and thereafter implemented throughout Project implementation Approval of ESIAs for the secondary ports will be considered condition of disbursement</li> <li>4. RAPs and Livelihood Restoration Plans shall be prepared, approved and implemented prior to commencement of any physical works. Preparation, approval and implementation of RAPs and Livelihood Restoration Plans of Port Boingoma, the secondary ports and</li> </ol>	<p>PIU PICMC Contractors (C-ESMP)</p> <p>PIU PICMC</p> <p>PIU PICMC</p> <p>PIU PICMC</p>
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<p>5. the C-ESCP and the environmental and social management plan for the selected quarry sites shall be approved by the Association implemented by the project .</p> <p>6. The technical Assistance activities (operationalization of the Port Authority, Enhancement of Maritime Safety, implementation Support) shall be consistent with the ESSs.</p>	<p>the "Vessel renewal program" will be considered conditions before the physical start of works.</p> <p>5. Final of the C-ESMP and ESIA for the selected quarry sites shall be approved and disclosed prior to issuing the civil works and thereafter implemented throughout Project implementation.</p> <p>6. ToR for the TA activities shall be prepared by the project and approved by the Association before launching the Request of Proposal (RP)</p>	<p>PIU PICMC Contractor</p> <p>PIU PICMC PORT AUTHORITY</p>
1.4	<p><b>MANAGEMENT OF CONTRACTORS, SUPPLIERS AND SERVICE PROVIDERS</b> Incorporate relevant aspects of the ESCP, including management tools and instruments referred to in Section 1.3 above, into the ESHS specifications of the tender documents issued to Contractors.</p> <p>Ensure that providers comply with the EHSS specifications of their respective contracts.</p>	<p>During the preparation of the tender documents and before the commencement of works.</p> <p>Ensure that these measures are applied during the entire period of the Project.</p> <p>Before the contract is signed and the physical start of works.</p>	PIU PICMC
1.5	<p><b>EMERGENCY RESPONSE COMPONENT (CERC)</b> Prepare necessary instruments to cover CERC activities in case of emergency to ensure compliance with the E&amp;S provisions of the Project. The ESMF shall be updated and include the CERC activities. This ESMF shall be approved by the Association</p>	<p>During the preparation of the CERC Manual. Before the beginning of the emergency intervention activities. CERC-specific E&amp;S instruments shall be complied with throughout implementation of CERC activities.</p>	PIU PICMC
<b>ESS2: LABOR AND WORKING CONDITIONS</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b> Develop and implement Labor Management Procedures (LMP) consistent with ESS2 and in a manner satisfactory to the Association.</p> <p>Prepare and approve site-specific LMPs as part of the Contractors' ESMP (C-ESMP) and based on the LMP prepared for the project.</p>	<p>LMP shall be finalized prior to the appraisal of the Project</p> <p>Before the commencement of the civil works</p>	<p>PIU PICMC</p> <p>Contractors</p>
2.2	<p><b>PROJECT WORKER GRIEVANCE REDRESS MECHANISM (GRM)</b> <b>Establish</b> and maintain GRM for any Project-related labor and employment matters (including SEA/SH), easily accessible to Project workers, in line with ESS2 and national labor laws.</p>	<p>Establish a PIU-based labor GRM within three (3) months of Project Effective Date and maintain it throughout project implementation.</p> <p>Establish GRM as part of the C-ESMP prior to the commencement of civil works and maintain it throughout duration of the works.</p>	<p>PIU PICMC</p> <p>Contractors</p>
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b> Adopt OHS measures consistent with ESS2 as part of LMPs under action 2.1 of this ESCP.</p> <p>Ensure Contractors develop and implement Occupational Health &amp; Safety Plans (OHSPs) following the WBG Environment, Health and Safety (EHS) Guidelines (for construction activities) and Industry Sector Guidelines for Construction Materials Extraction. The OHSP will also include procedures on incident investigation and reporting, recording and reporting of non-conformance, emergency preparedness and response procedures and on-going worker training/awareness.</p>	<p>On timeframe specified in 2.1.</p> <p>Develop and approve OHSPs before the commencement of works and implement them throughout project implementation.</p>	<p>PIU PICMC</p> <p>Contractors</p>
<b>ESS3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.1	<p><b>WASTE AND HAZARDOUS MATERIALS MANAGEMENT</b></p> <ol style="list-style-type: none"> <li>1. Develop and implement a Non-Hazardous and Hazardous Waste Management Plan for the project, including the management of the waste resulting from vessel decommissioning. Ensure that this plan is consistent with the Recipient's obligations under international treaties and ESS1.</li> <li>2. Identify waste management procedures prior to the start of activities and ensure compliance with the agreements established between these managers and the project contractors</li> <li>3. Ensure Contractors develop and implement site/specific Non-Hazardous and Hazardous Waste Management Plans.</li> </ol>	<ol style="list-style-type: none"> <li>1. The Waste Management Plan shall be developed within three (3) months of Effective Date and implemented throughout the physical works period</li> <li>2. Before the commencement of the physical works.</li> <li>3. Before the commencement of the physical works and implemented throughout the physical works period</li> </ol>	<p>PIU PICMC</p> <p>Contractors</p>
3.2.	<p><b>RATIONAL USE OF RESOURCES AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Ensure resource efficiency and pollution prevention and management measures are adopted and implemented by contractors working on the Project.</p>	<p>Same timetable as for the implementation of the ESMPs.</p>	<p>PIU PICMC</p>
<b>ESS4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>The contractor's health and safety plan shall include traffic management plan.</p>	<p>To be developed as part of ESMPs. To be implemented throughout the project</p>	<p>PIU PICMC Contractors</p>
4.2	<p><b>RISKS TO PUBLIC HEALTH AND SAFETY</b></p> <ol style="list-style-type: none"> <li>1. Ensure Contractors develop and implement ESIA/ESMP measures and actions to assess and manage the risks and impacts associated with the implementation of Project activities to local populations, including those related to the presence of Project workers and labor influx.</li> <li>2. Before the start of the work, the contractors will have to prepare a Health and Safety Plan (HSP) with a detailed analysis of the safety risks (including the risks related the use of security forces at the construction sites). Specific safety measures such as access to site facilities will have to be addressed in these documents</li> </ol>	<ol style="list-style-type: none"> <li>1. Measures to be included in site specific ESMPs. Implemented throughout the project</li> <li>2. HSP and Security Risk Assessment to be prepared before the beginning of physical works</li> </ol>	<p>PIU PICMC Contractors</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.3	<p><b>RISKS OF SEXUAL EXPLOITATION AND ABUSE, GENDER-BASED VIOLENCE, AND SEXUAL HARASSMENT DURING PROJECT IMPLEMENTATION</b></p> <p>Assess and manage the risks of SEA/GBV/SH related to the Project, including on children, and develop an Action Plan accordingly. Conduct a mapping of the referral services available in the area and an assessment of their level of functioning. The project will implement a specific mechanism for managing cases of gender-based violence in terms of referral and prevention</p>	<p>Action Plan for the Prevention, Mitigation and Response to SEA/GBV/SH to be available prior to the appraisal of the Project.</p> <p>Measures to be included in site specific ESMPs. Implemented throughout the project</p>	PIU PICMC
<b>ESS5: LAND ACQUISITION, LAND USE RESTRICTIONS AND INVOLUNTARY RELOCATION</b>			
5.1	<p><b>RESETTLEMENT ACTION PLANS</b></p> <ol style="list-style-type: none"> <li>1. Prepare and implement a Resettlement Policy Framework (RPF) for the project consistent with ESS5 and in a manner satisfactory to the Association.</li> <li>2. Prepare Resettlement Action Plans (RAPs), in accordance with the requirements of ESS 5 and national legislation for Biangoma and 3 secondary ports (Chindini, Hoani and Bimbini).</li> <li>3. Prepare a Livelihood Restoration Plan (as required) for kwassa kwassa operators.</li> </ol>	<ol style="list-style-type: none"> <li>1. RPF to be available prior to the appraisal of the Project</li> <li>2. The final version of each RAP shall be submitted to the Association for review and approval and shall be disclosed at the country level and on the WB website. RAPs shall be implemented before the start of civil works.</li> <li>3. Prior to the start of work on Subcomponent 2.2 on "Vessel renewal program"</li> </ol>	PIU PICMC
<b>ESS6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
6.1	<p><b>RISKS AND IMPACTS ON BIODIVERSITY</b></p> <ol style="list-style-type: none"> <li>1. Implement biodiversity management measures, in line with the ESIA guidelines of Component 1.1 “Infrastructure improvement of Port Fomboni “and the Component 1.2. “Improvement of secondary ports”. These E&amp;S measures shall be consistent with ESS6 and the obligations of the Recipient under relevant international treaties and agreements. The ESIA for the three secondary port shall be submitted to the Association for approval prior to the issuance of the tender documents to suppliers/contractors.</li> <li>2. Develop and implement a coral reef restoration plan in collaboration with the forestry services before launching of works.</li> </ol>	<ol style="list-style-type: none"> <li>1. Application of measures throughout the implementation of components 1.1 and 1.2</li> <li>2. Prior to the commencement of any physical works of Component 1.1 “Infrastructure improvement of Port Fomboni “and the Component 1.2. “Improvement of secondary ports”.</li> </ol>	PIU PICMC
<b>ESS7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
	Not relevant		
<b>ESS8: CULTURAL HERITAGE</b>			
8.1	<p><b>CHANCE FINDS</b></p> <ol style="list-style-type: none"> <li>1. Consistent with ESS8 and to the satisfaction of the Association, prepare, adopt and implement the incidental finding procedure described in the ESMP of Component 1.1 “Infrastructure improvement of Port Fomboni “and the Component 1.2. “Improvement of secondary ports”.</li> <li>2. Ensure that future specific E&amp;S studies include an assessment of cultural heritage sites in the area of influence of the sub-projects</li> <li>3. Include the incidental finding procedure of cultural heritage in company contracts</li> </ol>	<ol style="list-style-type: none"> <li>1. Prior to the appraisal of the Project</li> <li>2. During preparation and prior to implementation of sub-projects</li> <li>3. During preparation of the bidding documents for procurement of Construction Contractor(s)</li> </ol>	PIU PICMC

<b>ESS9: FINANCIAL INTERMEDIARIES</b>			
	Not relevant		
<b>ESS10: STAKEHOLDER MOBILIZATION AND INFORMATION</b>			
10.1	<p><b>PREPARATION AND IMPLEMENTATION OF THE STAKEHOLDER ENGAGEMENT PLAN</b></p> <p>Prepare, adopt and disseminate a Stakeholder Engagement Plan (SEP). Implement the SMP Update and reissue the SMP as required.</p>	<p>SEP to be prepared and approved by the Association by project appraisal</p> <p>Implemented the SEP throughout the Project Implementation</p>	PIU PICMC
10.2	<p><b>GRIEVANCE REDRESS MECHANISM AT THE PROJECT LEVEL</b></p> <p>Implement a Grievance Redress Mechanism for the entire project, as described in the SEP. This mechanism shall be structured to report SEA/GBV/SH related complaints in a timely (within 72 hours) in a confidential, ethical, non-discriminatory and survivor-centered manner.</p>	<p>GRM to be operationalized no later than three months after the Project Effective Date and thereafter maintained throughout Project implementation.</p>	PIU PICMC
<b>CAPACITY BUILDING (TRAINING)</b>			
	<b>Type of training to be offered</b>	<b>Schedule of training sessions</b>	<b>Target groups</b>
RC1	<p><b>TRAINING ON ENVIRONMENTAL AND SOCIAL STANDARDS APPLICABLE TO THE PROJECT</b></p> <ul style="list-style-type: none"> <li>• NES No. 1: Environmental and Social Assessment,</li> <li>• NES No. 2: Working and employment conditions,</li> <li>• NES No. 3: Rational use of resources and pollution prevention and management</li> <li>• NES No. 4: Population Health and Safety</li> <li>• NES No. 5: Land acquisition, land use restrictions and involuntary resettlement</li> <li>• NES No. 6: Preservation of biodiversity and sustainable management of natural biological resources</li> <li>• NES No. 8: Cultural Heritage</li> <li>• NES No. 10: Stakeholder engagement and information.</li> </ul>	<p>Commencement of the project for the PIU staff</p> <p>Six (6) months after the Project begins implementation for other stakeholders</p>	<p>PIU PICMC</p> <p>Island entities of PICMC</p> <p>Involved Sate's Technical services involved</p> <p>DGEF and its island entities</p> <p>ANAM</p> <p>Contractor and Supervision (ESS2, ESS4 and ESS8)</p>

<b>RC2</b>	<b>TRAINING ON HEALTH AND SAFETY AT WORK</b> Training of Project workers in occupational health and safety, including emergency prevention, preparedness and response. Health and safety rules Solid and liquid waste management Public safety and security	Before the start of the work of the sub-projects.	PIU PICMC Island entities of PICMC Suppliers/Contractors Navigation operators ANAM
<b>RC3</b>	<b>EMPLOYMENT AND WORKING CONDITIONS</b> Conditions of employment under national labour legislation Codes of conduct for suppliers, service providers and subcontractors Workers' organizations and trade unions Rules on child labour and the minimum age of admission to employment for children.	Before commencement of sub-projects 'works	Contractors Navigation operators ANAM
<b>RC4</b>	<b>SEA/GBV/SH</b> Procedures for recording and handling complaints, archiving Complaint Resolution Procedures Documentation and complaint handling Use of procedure by the different partners Raising public awareness SEA/SH awareness, prevention and mitigation measures	Six (6) months after commencement of the Project.	PIU PICMC Island entities of PICMC Suppliers/Contractors Communities close to intervention sites Navigation operators