

REPUBLIC OF EL SALVADOR

EL SALVADOR WATER SECTOR RESILIENCE PROJECT [*PROYECTO DE AGUA RESILIENTE EN EL SALVADOR*] (P178734)

First Draft

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

1 March 2023

Environment and Social Commitment Plan

1. The Republic of El Salvador (the Borrower) will implement the “El Salvador Water Sector Resilience Project [*Proyecto de Agua Resiliente en el Salvador*]” (the Project) with the involvement of the National Administration of Aqueducts and Sewerage of El Salvador [*Administración Nacional de Acueductos y Alcantarillados de El Salvador* ANDA], as set out in the Loan Agreement. The International Bank for Reconstruction and Development (the World Bank or the Bank) has agreed to provide financing for the Project, as set out in the referred Agreement.
2. The Borrower shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) of the World Bank, in a manner acceptable to the Bank. The ESCP is a part of the Loan Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Bank.
4. As agreed by the Bank and the Borrower, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Borrower authorizes ANDA to agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the President of ANDA. ANDA shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
Monitoring and Evaluation			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation, and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism.</p> <p>The Project Operations Manual (POM) shall include an annex with the minimum content and format of the reports.</p>	<p>After the Effective Date, biannual reports throughout Project implementation along with the Project Reports required under the Loan Agreement.</p>	ANDA
B	<p>INCIDENTS AND ACCIDENTS</p> <p>In the event of an 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 injuries, do the following:</p> <p>a. <i>Flash Report:</i> Promptly notify the Bank of any incident or accident, including the basic information about the incident or accident, its possible causes, scope and seriousness (indicating clearly if it involves a fatality), indicating the immediate measures that were taken or are being planned in order to address it, as well as any other information provided by a contractor or supervising firm, as appropriate.</p> <p>b. <i>Detailed Report:</i> Subsequently, at the Bank’s request, prepare and submit a report to the Bank on the incident or accident and propose any measures to address it and prevent its recurrence.</p> <p>The POM shall include an annex with the minimum content of the report on incidents/accidents.</p>	<p>a. Notify the Bank no later than 48 hours after learning of the incident or accident.</p> <p>b. Provide a detailed report within a timeframe acceptable to the Bank, as requested.</p>	ANDA

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>C</p> <p>CONTRACTORS' MONTHLY REPORTS</p> <p>a. Require contractors and supervising firms to provide monthly monitoring reports on Occupational Health, Safety and Environmental (OHSE) performance in accordance with the metrics specified in the respective procurement documents and contracts and submit such reports to the Bank.</p> <p>The report shall include the following topics, among other things:</p> <ul style="list-style-type: none"> • Implementation status of the Environmental and Social Impact Assessment (ESIA) and/or Environmental and Social Management Plan (ESMP) for proposed works, as applicable • OHSE incidents • OHSE supervision • Use of personal protective equipment (PPE), such as safety helmets, shoes, and vests by workers, as well as masks and other equipment necessary to prevent the spread of COVID-19 • Training provided and participation of workers • Workers' grievances • Community's grievances 	<p>a. Submit the monthly reports presented to the PMU, according to the specifications in the respective procurement documents. The reports will be submitted to the Bank, when requested.</p>	<p>ANDA</p>
<p>ESS 1: Assessment and Management of Environmental and Social Risks and Impacts</p>		

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>1.1 ORGANIZATIONAL STRUCTURE</p> <p>a. ANDA shall maintain a Project Management Unit (PMU) with qualified staff and resources to support the management of OHSE risks and impacts of the Project. These shall include, at least, two full-time, in-house specialists: one (01) environmental specialist and one (01) social specialist, with qualifications and experience acceptable to the Bank. In addition, ANDA shall have an occupational health and safety (OHS) specialist in the Project area for the duration of the civil works.</p> <p>b. The PMU shall mobilize E&S supervisors (including at least one environmental specialist, one social specialist, and one OHS specialist) to supervise the execution of the civil works activities of the Project’s E&S instruments, in accordance with the metrics and the ToRs that shall be agreed on with the Bank, in a timely manner.</p>	<p>a. The Environmental and Social Specialists have already been appointed. The OHS specialist shall be hired or appointed prior to the start of works.</p> <p>The PMU and the specialists shall be retained for the duration of the Project, except for the OHS Specialist, who shall only be engaged for the duration of the civil works.</p> <p>b. The E&S supervisors shall be mobilized before the start of the civil works and onwards until the works are completed.</p>	<p>ANDA</p>
<p>1.2 ENVIRONMENTAL AND SOCIAL MANAGEMENT FRAMEWORK</p> <p>Update, adopt, disclose, and implement the ESMF in accordance with the ESSs, environmental, health and safety (EHS) guidelines and other relevant Good International Industry Practices (GIIP), in a manner acceptable to the Bank.</p> <p>The ESMF shall include, inter alia: (i) identification of applicable national legislation; (ii) an environmental and social assessment, including an E&S characterization of the Project area, and identification and assessment of positive and negative, direct and indirect E&S risks and impacts; (iii) appropriate generic E&S mitigation measures in accordance with the mitigation hierarchy; (iv) implementation arrangements (including monitoring, supervision, and reporting) during the design, construction, and operation phases; (v) an E&S budget for all related activities and measures; and (vi) the procedure for conducting the E&S assessment and the criteria for the development of specific ESIAs or ESMPs, where required.</p>	<p>Draft ESMF already prepared and disclosed. The ESMF shall be finalized and disclosed no later than 60 days after the Effective Date and thereafter implemented throughout Project implementation.</p>	<p>ANDA</p>
<p>1.3 MANAGEMENT TOOLS AND INSTRUMENTS</p>	<p>a. In the case of activities or works requiring the preparation of</p>	<p>ANDA</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none"> a. Examine any proposed Project activity or works in accordance with the procedures and rules established in the ESMF, including the application of the mitigation hierarchy. According to such assessment, draft, consult, disclose, adopt, and implement a specific ESIA/ESMP, as applicable, in a manner acceptable to the Bank, whether directly or through contractors. b. Where an ESIA is applicable, verify that the E&S assessment adopts the ESS1 mitigation hierarchy, and that the climate change variable is included as part of the assessment. Similarly, the ToR for ESIA shall establish minimum professional and technical qualifications for the team in charge of such instruments. 	<p>specific ESIA and/or ESMPs, these shall be prepared, consulted on with stakeholders, and submitted to the Bank for review and approval (where required under the POM), and subsequently adopted and disclosed before launching the bidding processes for works or before finalizing the technical file for works that are not subject to a bidding process, and applied during the implementation of such works. The specific ESIA/ESMP shall be included in the contracts with the contractors.</p> <ul style="list-style-type: none"> b. As part of the preparation of the procurement documents and the respective contracts. 	
<p>1.4 PERMITS, CONSENTS AND AUTHORIZATIONS Obtain or assist in obtaining, as appropriate, permits, consents, and authorizations applicable to the Project from the relevant national and municipal authorities. Comply with or monitor, as appropriate, the conditions set out in these permits, consents, and authorizations throughout Project implementation.</p>	<p>Permits, consents, and authorizations shall be obtained before starting the activities that require them.</p>	<p>ANDA</p>
<p>1.5 MANAGEMENT OF CONTRACTORS</p> <ul style="list-style-type: none"> a. Incorporate the relevant aspects of the ESCP, including the requirements according to the specific ESMF and/or specific ESIA/ESMP, other documents and/or relevant plans in the area of environment and health, Labor Management Procedures (LMP), and the code of conduct, as deemed relevant, in the OHSE specifications of the respective procurement documents and contracts for contractors. Thereafter ensure that the contractors comply with the OSHE specifications in their respective contracts. b. Ensure that contractors, including E&S supervisors and consultants, have the necessary staff, capacity, and budget to meet the technical specifications related to the OHSE aspects of their contracts. 	<p>Prior to the launching of bidding/procurement processes for Project activities for which contractors, including supervising entities and consultants, are hired, and thereafter, to ensure compliance with the respective contracts throughout Project implementation.</p>	<p>ANDA</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> c. Implement robust monitoring of contractors throughout Project implementation to ensure that they comply with all the relevant OHSE specifications and codes of conduct specified in their respective contracts and take corrective actions as necessary. d. Incorporate the relevant aspects of the ESCP, including the provisions of the ESMF, ESIA, ESMP, and LMP, as well as the applicable OHS provisions of the ESMF, into the contracts with the supervising firms, and monitor their work to ensure adequate quality of supervision and management of OHSE risks related to their duties. 		
1.6	<p>CONTINGENT EMERGENCY RESPONSE (CER)</p> <ul style="list-style-type: none"> a. Ensure that the CERC Manual includes a description of the E&S management arrangements and instruments for Part 4 of the Project, in accordance with the ESSs. b. Prepare, disclose, consult, and adopt any E&S management plans or instruments that may be required for activities under Part 4 of the Project, in accordance with the CERC Manual and the ESSs, and then implement the measures and actions required under such E&S management plans or instruments, within the timeframes specified in such plans or instruments. 	<ul style="list-style-type: none"> a. The adoption of the CERC Manual in form and substance acceptable to the Bank is a withdrawal condition under Section III.B. of Schedule 2 of the Loan Agreement. b. E&S management plans or instruments shall be prepared, disclosed, consulted and subsequently adopted prior to the implementation of activities under Part 4 of the Project. Such plans or instruments shall be implemented in accordance with their terms throughout Project implementation. 	Borrower
1.7	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that consultancies, studies, capacity building, training, and any other technical assistance (TA) activities under the Project are carried out in accordance with ToR acceptable to the Bank, which shall incorporate and take into account and be consistent with the requirements of applicable ESSs. Thereafter, ensure that TA results comply with the ToR.</p>	Throughout Project implementation.	ANDA
ESS 2: Labor and Working Conditions			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Update, adopt, and implement the LMP for the Project, in accordance with the applicable requirements of ESS2, including among other things, adequate health and labor safety measures, grievance mechanisms for Project workers, a Code of Conduct for workers, and other labor requirements to be incorporated into the OHSE specifications of the procurement documents used with contractors and supervising firms. The LMP shall also include, inter alia, provisions on working conditions, management of workers' relationships, occupational health and safety (OHS) (including PPE, COVID-19 prevention, and emergency preparedness and response), prevention of SEA and SH, forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	Draft LMP prepared and disclosed. The LMP shall be updated, consulted, and disclosed no later than 60 days after the Effective Date. All measures specified in the LMP shall be implemented throughout Project implementation.	ANDA
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Maintain and operate a grievance mechanism specifically for Project workers, as described in the LMP and consistent with ESS2.</p>	The Labor Grievance Mechanism is detailed in the LMP and shall be implemented throughout Project implementation.	ANDA
2.3	<p>OHS MEASURES</p> <p>a. As part of the ESMF, implement an Occupational Health and Safety Plan (OHSP) consistent with EHS guidelines and other GIIP, which shall include prevention and control measures against COVID-19 infections.</p> <p>b. Incorporate relevant occupational health and safety measures into procurement and contract documents for all construction and supervising firms.</p> <p>c. Ensure that supervising firms hire OHS specialists.</p> <p>d. Ensure that the specified OHS measures are implemented at each worksite.</p>	<p>a. The same timeframe as in actions 1.2 and 1.3 above.</p> <p>b. Prior to the procurement process for each works package and supervision contract.</p> <p>c. Through the procurement documents and contracts for supervising firms.</p> <p>d. During the execution of the individual works.</p>	ANDA
2.4	<p>COVID-19 AND EMERGENCY PREPAREDNESS AND RESPONSE</p> <p>As part of the ESMF, develop and implement an Emergency Response Plan (ERP). Ensure that workers and contractors are trained and implement these plans.</p>	The same timeframe as in actions 1.2 and 1.3 above. Monitor throughout Project implementation.	ANDA
2.5	<p>TRAINING OF PROJECT WORKERS</p> <p>Implement and require that contractors and E&S Supervisors conduct training activities with their staff for Project workers, designed to increase awareness of health and safety</p>	As part of the on-boarding process for any worker participating in the Project, with reminder sessions throughout the execution of the works.	ANDA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>risks and management measures associated with Project activities, as shall be specified in the LMP and the ESMF. In particular, this shall include:</p> <ul style="list-style-type: none"> • Codes of conduct (including prevention of SEA/SH) and other issues related to the management of risks arising from labor input and labor management for contractors. • Guidance on the OHSP and ERP, including for community workers. • Awareness of the labor grievance mechanism for all Project workers. 		
2.6	<p>CODE OF CONDUCT Require in procurement documents that contractors and supervising firms establish a Code of Conduct to be followed by all workers, including subcontractors. The LMP sets out a template with the minimum content of the Code of Conduct. The template shall also be attached to the POM.</p>	A template with the minimum content of the Code of Conduct is included in the LMP. Contractors and supervising firms shall be required to implement the Code of Conduct as part of the procurement documents and the respective contracts. Supervise throughout Project implementation.	ANDA
ESS3: Resource Efficiency and Pollution Prevention and Management			
3.1	<p>PROCUREMENT OF RAW MATERIALS AND CONSTRUCTION MATERIALS Ensure that raw materials and construction materials (e.g., sand, stone, wood, etc.) are sourced from approved and, if possible, certified suppliers and quarries.</p>	As part of the preparation of the procurement documents and the respective contracts. Supervise throughout Project implementation.	ANDA
3.2	<p>MANAGEMENT OF MATERIALS AND HAZARDOUS WASTES Ensure full implementation of national legislation and guidelines/codes, which shall be specified in the ESMF and/or the specific ESIA/ESMPs in relation to the following:</p> <ul style="list-style-type: none"> • Hazardous and non-hazardous solid waste management • Wastewater management • Sludge management • Vector and pesticide management • Replacement of pipes and other asbestos-contaminated facilities <p>Asbestos and lead handling and removal measures shall be developed and implemented where necessary. These measures shall be part of the relevant ESMF and specific ESIA/ESMPs.</p>	The same timeframe as in actions 1.2 and 1.3 above. Supervise throughout Project implementation.	ANDA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3.3	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention management measures into the ESMF and in the specific ESIAs/ESMPs.</p>	The same timeframe as in actions 1.2 and 1.3 above. Supervise throughout Project implementation.	ANDA
3.4	<p>CLIMATE CHANGE</p> <p>Revise and update the Project’s Greenhouse Gas (GHG) emissions calculation, following the methodology agreed with the Bank.</p>	During Project implementation and once more information becomes available, the environmental specialist of the PMU shall revise and update the GHG estimation accordingly	ANDA
ESS 4: Community Health and Safety			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>a. Adopt and apply measures and actions to evaluate and manage traffic and road safety risks, as required in the ESMF and the specific ESIAs/ESMPs.</p> <p>b. Appropriate processes shall be adopted for vehicles or fleets of vehicles used for the Project, including regular driver training, to improve the safety of drivers and vehicles.</p>	<p>a. The same timeframe as in actions 1.2 and 1.3 above.</p> <p>b. As part of the preparation of the procurement documents and the respective contracts. Supervise throughout Project implementation.</p>	ANDA
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Develop, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, community risk of exposure to COVID-19 and other infectious diseases, Project worker behavior, risks related to labor influx, emergency response, and informal waste collection, and include these measures in the specific ESIAs/ ESMPs, as required by the ESMF.</p> <p>Site-specific emergency preparedness and response plans shall be developed, which shall include general emergency and preparedness planning and training procedures, as well as operational facility maintenance requirements. These plans shall form part of the specific ESIAs/ESMPs to be prepared in accordance with the ESMF.</p>	The same timeframe as in action 1.3 above.	ANDA
4.3	<p>DAM SAFETY</p> <p>Review and implement the dam safety plans for the Torogoz gate intake structure system designed by qualified engineers in accordance with GIIP, which includes:</p> <p>(i) Operation and Maintenance Plan (O&MP), including technical assistance or training to fulfill this plan’s requirements</p> <p>(ii) Emergency Preparedness Plan (EPP)</p>	Dam safety plans prepared no later than one (1) year after the Effective Date.	ANDA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.4.	<p>SECURITY PERSONNEL</p> <p>In the event that in-house or external security personnel are required to safeguard the security of the Project, its personnel or assets, the measures of the ESMF and/or the specific ESIA/ESMPs shall be implemented, 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.</p>	The same timeframe as in actions 1.2 and 1.3 above.	ANDA
4.5	<p>FIRE SAFETY CONSIDERATIONS</p> <p>Fire safety and lifesaving considerations in line with national legislation and the WB's environmental, health and safety (EHS) guidelines shall be covered in the ESMF and the specific ESIA/ESMPs.</p>	The same timeframe as in actions 1.2 and 1.3 above.	ANDA
ESS 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement			
5.1	<p>INVOLUNTARY RESETTLEMENT</p> <p>Review, finalize, adopt, publish, and implement a Resettlement Policy Framework (RPF) that sets out the guiding principles for implementing land acquisition for the Project, in line with the ESS5 and in a manner acceptable to the Bank.</p>	<p>Draft RPF prepared and disclosed, shall be finalized, adopted, and published no later than 60 days after the Effective Date.</p> <p>The RPF shall be implemented throughout the duration of Project.</p>	ANDA
5.2	<p>RESETTLEMENT ACTION PLANS (RAPs)</p> <p>Involuntary resettlement shall be minimized and technically viable alternatives with the least possible impact shall be sought from the planning of the Project, as described in the RPF. For cases where resettlement cannot be avoided, prepare, disclose, consult, adopt, and implement the Resettlement Action Plans (RAPs), in accordance with the RPF and ESS5. The Borrower shall secure the funds to implement the RAP.</p> <p>ANDA shall not resort to forced evictions of affected persons, as defined under ESS5.</p>	<p>a. The RAPs shall be developed, finalized, and approved by the Bank before launching the bidding processes for works or before finalizing the technical file for works that are not subject to a bidding process</p> <p>b. The RAPs shall be implemented, including ensuring that before taking possession of the land and related assets, full compensation has been provided and displaced persons have been resettled and moving allowances have been provided .</p>	ANDA
5.3	<p>LAND DONATION ARRANGEMENTS:</p>	Before implementing any works.	ANDA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Any agreement between ANDA and any person for the donation or use of their land without compensation at replacement cost shall be acceptable only if: (a) the potential donor or donors have been appropriately informed and consulted about the Project and the choices available to them; (b) potential donors are aware that refusal is an option, and have confirmed in writing their willingness to proceed with the donation; (c) the amount of land being donated is minor and will not reduce the donor's remaining land area below that required to maintain the donor's livelihood at current levels; (d) no household relocation is involved; (e) the donor is expected to benefit directly from the Project; and (f) for community or collective land, donation can only occur with the consent of individuals using or occupying the land, as set out in the ESMF and the RPF, , and subject to the prior approval of the Bank. A transparent record of all consultations and agreements reached shall be documented in the ESMP/ESIA, as applicable.		
ESS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>a. Incorporate and implement procedures, as specified in the ESMF and the specific ESIA/ESMPs, to ensure that the activities financed by the Project are not located in or negatively impact biodiversity and environmentally sensitive areas, particularly in natural or critical habitats, including forests, wetlands, and/or natural protected areas.</p> <p>b. In the event that a specific ESIA/ESMP for proposed works identifies the need for a Biodiversity Management Plan (BMP) and/or an offset plan for loss or degradation of natural habitat, the plan shall be developed in accordance with ESS6 and applicable national standards, in a manner acceptable to the Bank.</p>	<p>a. The same timeframe as in actions 1.2 and 1.3 above.</p> <p>b. Obtain the Bank's approval for the BMP before starting the procurement processes for the necessary works. After that, implement the BMP in accordance with its terms.</p>	ANDA
ESS 7: Indigenous Peoples			
This standard is not relevant for this Project's works. During Project preparation, an analysis was done of the municipalities where works will take place and it was concluded that no Indigenous Peoples were identified that satisfy the criteria of ESS7.			
7.1	<p>TECHNICAL ASSISTANCE</p> <p>Regarding the technical assistance activities, ensure that the terms of reference for such activities include screening criteria to determine whether such activities would have effects on Indigenous Peoples (IPs) in the Project area. If that is the case, ensure that the outputs for such technical assistance consider potential risks and impacts, and benefits for IPs, consistent with ESS7.</p>	The same timeframe as in action 1.7 above.	ANDA
IESS 8: Cultural Heritage			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
8.1	<p>CULTURAL HERITAGE MANAGEMENT</p> <p>a. As part of the specific ESIA/ESMPs, an assessment of the tangible and intangible cultural heritage present in the areas likely to be affected by the Project activities shall be carried out in accordance with the requirements specified in the ESMF. If an ESIA/ESMP identifies the need to develop, adopt, and implement a Cultural Heritage Management Plan (CHMP), this shall be developed in accordance with national standards and the requirements of ESS8.</p> <p>b. In the event that civil works within the Historic Center are necessary, national legislation, historic center management plans, ESS8 and internationally recognized practices for field surveys, documentation and protection of cultural heritage shall be complied with, as reflected in a CHMP to be prepared for this effect. Cultural heritage experts as well as historic center managers shall also be consulted in advance.</p>	<p>a. The same timeframe as in action 1.3 above.</p> <p>b. Obtain the Bank’s approval for the CHMP before starting the procurement processes for the necessary works. After that, apply the CHMP in accordance with its terms.</p>	ANDA
8.2	<p>CHANCE FINDS</p> <p>Develop, adopt, and implement the chance finds procedures for the Project that involves civil works as part of the corresponding specific ESIA and/or ESMP. The contractors and third parties involved in the civil works shall comply with the procedures and the Client will ensure this.</p>	Incorporate and apply in the ESIA and/or ESMP, as indicated in action 1.3 above.	ANDA
<p>ESS 9: Financial Intermediaries This standard is not relevant for this Project.</p>			
<p>ESS 10: Stakeholder Engagement and Information Disclosure</p>			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN</p> <p>a. Update, finalize, and disclose the initial draft of the Stakeholder Engagement Plan (SEP) developed for the Project. The SEP shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them and enable their participation through a socially inclusive approach, which is free from manipulation, interference, coercion, discrimination, and intimidation. The SEP shall incorporate gender consultation to identify contextual factors that affect men and women.</p> <p>b. Implement the SEP.</p>	<p>a. Draft SEP already prepared and disclosed prior to Project Appraisal. The SEP shall be updated, consulted, finalized, and disclosed no later than 60 days after the Effective Date.</p> <p>b. Throughout Project implementation.</p>	ANDA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.2	<p>GRIEVANCE REDRESS MECHANISM</p> <p>Maintain, and operate a Project Grievance Redress Mechanism (GRM) at the Project level, as described in the SEP, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	<p>The GRM shall have adequate resources in the same timeframe as 10.1 above and shall be operated throughout Project implementation.</p>	<p>ANDA</p>
CAPACITY SUPPORT			
CS1	<p>Conduct periodic training to project workers, including public servants, contractors, supervisors and other actors, as deemed relevant. The training topics shall be agreed with the Bank and may cover, in particular, the following:</p> <ul style="list-style-type: none"> • Project E&S management tools • Integrated hazardous and non-hazardous waste management • Workers' OHS • Infectious disease prevention and response • Prevention and response measures, and development and implementation of measures against gender-based violence (including among contractors, workers, and civil servants involved in the Project) • Non-discrimination against vulnerable groups • PGSM • Traffic safety • Use of security forces 	<p>The trainings shall be provided throughout Project implementation by the PMUs and/or their supervision consultants or other consultants contracted to support the Project, according to a timeframe agreed with the Bank.</p> <p>Relevant trainings to civil works will be delivered prior to the start of such works or activities.</p>	<p>ANDA</p>