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FEDERAL REPUBLIC OF SOMALIA



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MINISTRY OF FINANCE

De-Risking, Inclusion, and Value Enhancement of Pastoral Economies in the Horn of Africa (P176517)

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP) SOMALIA

25 April 2022

1. The Federal Republic of Somalia (“Recipient”), through its Ministry of Finance (MoF) at the Federal level with the involvement of other ministries and participating Federal Member States on relevant activities, shall implement the **De-Risking, Inclusion, and Value Enhancement of Pastoral Economies in the Horn of Africa (DRIVE) Project** (hereinafter known as “**the Project**”). Component 1 of the Project shall be implemented by ZEP-RE pursuant to a Subsidiary Agreement to be signed between MoF and ZEP-RE, and Component 2 of the Project shall be implemented by the Ministry of Finance (MoF). The International Development Association (IDA, hereinafter “**the Association**”) has agreed to provide financing for the Project.
2. The Recipient shall implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**) of the World Bank. This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these. All references to actions to be carried out by ZEP-RE are actions in relation to Component 1.
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, including:
 - a. Stakeholder Engagement Plan (SEP);
 - b. Social Assessment (SA);
 - c. Environmental and Social Management Framework (ESMF) including Security Management Plan (SMP), Gender-Based Violence (GBV) Action Plan, and Labor-Management Procedures (LMP).
4. The Recipient is responsible for compliance with all requirements of the ESCP even when the implementation of specific measures and actions is conducted by the Ministry, agency, or unit referenced in 1, above.
5. Additional specific measures and actions for implementation of Component 1 are set forth in a separate ESCP between the Association and ZEP-RE (the “ZEP-RE ESCP”). The ZEP-RE ESCP is hereby incorporated by reference into this ESCP and the Recipient is responsible for ensuring ZEP-RE’s compliance with all requirements of the ZEP-RE ESCP in Somalia. Without limiting the foregoing, the Recipient’s monitoring and reporting responsibilities set forth below shall include the responsibility to monitor and report on implementation of the ZEP-RE ESCP in Somalia.
6. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Association by the Recipient as required by the ESCP and the conditions of the legal agreement, and the Association shall monitor and assess the progress and completion of the material measures and actions throughout the implementation of the Project.
7. As agreed by the Association and the Recipient, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to the assessment of Project performance conducted under the ESCP itself. In such circumstances, the Recipient through the minister responsible for MoF shall agree to the changes with the Association and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Association and the Recipient through the minister responsible for MoF. The MoF shall promptly disclose the updated ESCP on its publicly accessible website.

8. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, health, and safety impacts, labor influx, security risks to the community, project personnel and assets and Gender-Based Violence.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>i. 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 this ESCP; status of preparation and implementation of E&S documents required under the ESCP; stakeholder engagement activities; and functioning of the grievance mechanism(s).</p>	<p>i. Quarterly throughout Project implementation.</p> <p>ii. Focal points for the Federal Member States shall report to the Project Implementation Unit (PIU) every month.</p>	<p>i. PIU</p>
B	<p>INCIDENTS AND ACCIDENTS NOTIFICATION</p> <p>i. 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. Provide sufficient details regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate.</p> <p>ii. Provide sufficient detail regarding the incident or accident indicating immediate measures taken to address it, findings of the Root Cause Analysis (RCA), corrective actions taken, compensation paid, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the Association's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>i. Promptly after taking notice of the incident or accident and no later than 48 hours after learning of the incident or accident, using such reporting protocols and procedures as the Association may communicate.</p> <p>ii. Root-cause analysis at the Association's request for such an analysis, along with measures to prevent recurrence to be provided within fifteen days of the</p>	<p>i. PIU</p> <p>ii. PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> iii. Subsequently, as per the Association’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence. 	<p>accident/incident occurring.</p> <ul style="list-style-type: none"> iii. Report all other incidents and accidents to the Association in quarterly reports. 	<ul style="list-style-type: none"> iii. PIU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE		
	<ul style="list-style-type: none"> i. Establish and maintain an organizational structure at the Federal Government of Somalia (FGS) level including one officer full-time to fulfill the duties of Environmental Safeguards Officer (ESO) and Social Safeguards Officer (SSO) . 	<ul style="list-style-type: none"> i. Before the start of activities on component 2 and throughout project implementation. 	<ul style="list-style-type: none"> i. PIU
1.2	<ul style="list-style-type: none"> i. Prepare a Social Assessment (SA) to identify barriers to entry, particularly those related to discrimination, bias, literacy, and numeracy for disadvantaged groups including the Indigenous Peoples/Vulnerable and Marginalized Groups (IP/VMGs), and determine if there are technically feasible measures that can be implemented to facilitate the access by disadvantaged groups and eliminate discrimination. ii. Ensure inclusion of disadvantaged groups (including minority clan and ethnic groups) through project design and in the social instruments (the ESMF and SEP which has an inclusion plan) in line with the requirements of ESS1. 		
1.3	ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT TOOLS AND INSTRUMENTS		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> i. Prepare, consult on, adopt and publicly disclose and thereafter implement a project-wide Environmental and Social Management Framework (ESMF) which shall set out the principles, rules, guidelines, and procedures to assess the environmental and social risks and impacts for the implementation of the Project emanating from all known and potential activities it shall support through the beneficiary agencies, and which shall be consistent with the relevant ESS's. ii. In accordance with the ESMF, undertake site-specific environmental and social risk screening, site-specific impact assessments, and management plans for subprojects including assessment of the physical and biological environment, location of the selected livestock infrastructure for upgrading/value chains, ensuring equity and inclusivity of infrastructure selections as well as the capacity of likely contractors to implement ESMPs and monitoring arrangements. iii. Confirm that ZEP-RE has adopted and disclosed the ZEP-RE ESMS. 	<ul style="list-style-type: none"> i. Preparation, consultation, disclosure and adoption prior to project effectiveness. Thereafter implement the ESMF throughout project implementation. ii. Prior to the implementation of site-specific subprojects. iii. Prior to project effectiveness 	<ul style="list-style-type: none"> i. PIU ii. PIU
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, SA, ESMP, LMP, GBV Action Plan, into the ESHS specifications of the procurement documents with contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts.</p>	<ul style="list-style-type: none"> i. Prior to the preparation of procurement documents and in the final contracts. ii. PIU to ensure all relevant ESS clauses are included and budgeted for before signing of contracts. 	<ul style="list-style-type: none"> i. PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.5	<p>MONITORING AND INSPECTION</p> <p>i. Continuously monitor environmental and social risks and their impacts on the environment, Project-affected communities, and workers to ensure effective compliance in accordance with, <i>inter alia</i>, the ESMF, SEP, LMP, ESHS instruments, ZEP-RE ESCP, conditions of approval, capacity, and reporting requirements as set out in this ESCP and take necessary remedial actions acceptable to the Association.</p>	i. Throughout the Project Implementation	i. PIU, and quality enhancement firm.
1.6	<p>EXCLUSION CRITERIA</p> <p>i. The following types of activities are ineligible for financing under the Project:</p> <ul style="list-style-type: none"> • Any activities resulting or anticipated to result in permanent or temporary physical or economic displacement. • Any activities involving adverse impacts on biodiversity conservation and sustainable management of living natural resources. • Any activities that have adverse impacts on cultural heritage as defined under ESS 8. • Any activities that, due to the nature and scale of the activities, would result in a wide range of significant adverse impacts and risks, which are long-term, permanent, and/or irreversible, impossible to avoid entirely, and cannot be mitigated or required complex, unproven mitigation and excessive associated costs, rendering its risk classification as high. • Production or trade in any product or activity deemed illegal under the Recipient's laws or regulations or ratified international conventions and agreements. • Production or trade-in pesticides/herbicides subject to international phase-outs or bans. • Any activities that would curtail workers' fundamental rights. These would include: (i) freedom of association and the effective recognition of the right to collective bargaining; (ii) prohibition of all forms of forced or compulsory 	i. Throughout the Project Implementation	i. PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>labor; (iii) prohibition of child labor, including without limitation the prohibition of persons under 18 from working in hazardous conditions (which includes construction activities), persons under 18 from working at night, and that persons under 18 be found fit to work via medical examinations; (iv) elimination of discrimination in respect of employment and occupation, where discrimination is defined as any distinction, exclusion or preference based on race, color, sex, religion, political opinion, national extraction, or social origin.</p> <ul style="list-style-type: none"> • Production or activities that impinge on the lands owned, or claimed under adjudication, by indigenous peoples, without full documented consent of such peoples. • Any other excluded activities as set out in the ESMF for the Project. 		
1.7	<p>PERMIT, CONSENTS, AND AUTHORIZATIONS</p> <p>i. Ensure that all project activities obtain all requisite permits, consents, and authorizations from relevant national authorities that apply to subprojects that they shall support and that these agencies comply with the conditions established in these permits, consents, and authorizations.</p>	i. Valid throughout project implementation.	i. PIU
1.8	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that any consultancies, studies, capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association and that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	ii. Throughout project implementation and prior to contracting the relevant activities.	PIU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES (LMP)</p>		i. PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>i. Develop LMP to address labor risks compliant with ESS 2 requirements in form and substance acceptable to the Association, including (but not limited to):</p> <ul style="list-style-type: none"> • conditions of service; • code of conduct; • occupational, health and safety (OHS) measures; • Covid-19 prevention measures; • prevention of child and forced labor; • emergency preparedness and response; • Grievance Mechanism for project workers; • training of project workers on key issues including OHS and GBV prevention; and management of labor influx. 	<p>i. Condition for project effectiveness.</p>	
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>i. Develop and maintain a Grievance Mechanism for direct and contracted workers, as outlined in the LMP as well as a confidential mechanism for SEA/SH complaints.</p>	<p>i. Worker's grievance mechanism to be operational three months after effectiveness and to be maintained throughout Project implementation.</p>	<p>i. PIU</p>
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>i. Develop and implement occupational, health, and safety (OHS) measures, based on World Bank EHS Guidelines, as part of the LMP including through, inter alia, implementing adequate OHS measures and incorporating requirements into the ESHS specifications of the procurement documents and contracts with contractors, and their respective ESMPs in accordance with the ESMF.</p>	<p>i. Measures to be developed two months after project effectiveness and operational prior to requesting bids from contractors.</p>	<p>i. PIU</p>
2.4	<p>EMERGENCY PREPAREDNESS AND RESPONSE</p>	<p>i. EPR plans to be prepared prior to engaging Project</p>	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> i. As part of the OHS measures specified in 2.3, include a detailed plan on emergency preparedness and response to cover project workers and ensure coordination with measures specified under 4.4 below. 	workers and commencement of project activities and maintained throughout project implementation.	<ul style="list-style-type: none"> i. PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<ul style="list-style-type: none"> i. Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts on resource efficiency and pollution prevention and management to the community arising from the activities they finance through the beneficiary agencies. These measures shall be included in the subproject Environmental and Social Management Plans (ESMPs) and the Summary Project Reports (SPRs) or Comprehensive Project Reports (CPRs) in accordance with ESS3 requirements, and national laws, in a manner acceptable to the Association. 	<ul style="list-style-type: none"> i. Throughout project implementation 	<ul style="list-style-type: none"> i. PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>COMMUNITY HEALTH AND SAFETY</p> <ul style="list-style-type: none"> i. Adopt and implement measures and actions to assess and manage specific risks and impacts to the community arising from Project activities, including risks of labor influx; risk of exposure to infectious diseases (including COVID-19 and HIV/AIDS); response to emergency situations due to conflict or natural disasters, construction and structural safety risks, as well as traffic and road safety risks, and include these measures and actions in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Association. The ESMF and SA shall be prepared and assess the GBV risks under the project. 	<ul style="list-style-type: none"> i. Prepare, adopt and publicly disclose the site-specific-ESMPs prior to implementation of site-specific subprojects ii. Monitor implementation throughout Project implementation. 	<ul style="list-style-type: none"> i. PIU
4.2	COMMUNITY HEALTH AND SAFETY		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> i. Through the ESMF, develop measures to assess and manage specific risks and impacts on community health and safety arising from project activities that they finance, and include these measures in the EsMPs, and SPRs or CPRs, in accordance with the ESS4 requirements and the national laws and regulations, in a manner acceptable to the Association. 	<ul style="list-style-type: none"> i. Throughout project implementation ii. As part of the project ESMF is a condition of project effectiveness. 	<ul style="list-style-type: none"> i. PIU ii. PIU
4.3	<p>GBV (SEA and SH) RISKS</p> <ul style="list-style-type: none"> i. Develop and implement a GBV Action Plan setting forth measures and actions to assess and manage the risks of GBV arising in connection with the Project and establish GBV reporting channels and survivor-centric referral pathways . 	<ul style="list-style-type: none"> i. As part of the ESMF, as a condition of effectiveness. 	<ul style="list-style-type: none"> i. PIU
4.4	<p>SECURITY MANAGEMENT</p> <ul style="list-style-type: none"> i. Carry out a risk assessment and develop a security management plan for each site as necessary, implement measures and actions to manage the risks to the human security of project-affected communities and project workers that could arise from the use of security personnel, or communal violence, or any incident that may be directly or indirectly connected with project activities. The ESMF shall also assess the security risks and set out the process to assess site specific risks and develop Security Management measures and Plans as required. 	<ul style="list-style-type: none"> i. Throughout project implementation. 	<ul style="list-style-type: none"> i. PIU
4.5	<p>SECURITY PERSONNEL</p> <ul style="list-style-type: none"> i. The following measures shall be adopted, to ensure that the engagement of military and security personnel for the provision of security to Project workers, sites, and/or assets, is carried out in accordance with the ESSs: 	<ul style="list-style-type: none"> i. 3 months after project effectiveness and prior to engaging security personnel. 	<ul style="list-style-type: none"> i. PIU

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>a) Assess the risks and impacts of engagement of the military and security personnel as part of the assessment referred to in action 1.2 above, and incorporate and implement measures to manage such risks and impacts in relation to hiring, rules of conduct, training, equipping, and monitoring of such security personnel as part of the security management plans referred to in 4.4, above. .</p> <p>b) Adopt and enforce standards, protocols, and codes of conduct for the selection and use of military and security personnel and screen such personnel 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>c) Ensure that PIU signs a memorandum of understanding (MoU), with the Ministry of Security and the NISA setting out the arrangements for the engagement of the military and security personnel under the Project, including compliance with the relevant requirements of this ESCP.</p> <p>d) Ensure that such personnel is adequately instructed and trained, 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 Project Operational Manual and ESMF.</p> <p>e) Ensure that the stakeholder engagement activities under the Stakeholder Engagement Plan (SEP) include a communication strategy on the involvement of military and security personnel under the Project.</p> <p>f) Ensure that any concerns or grievances regarding the conduct of military and security personnel are received, monitored, documented (taking into account the need to protect confidentiality), resolved through the Project’s grievance mechanism. security-related incidents shall be reported to the Association in accordance with action B of this ESCP. Where the Association shall require, after consultation with the Recipient: (i) promptly appoint a third-party monitor consultant, with terms of reference, qualifications, and experience satisfactory to the Bank, to visit and monitor the Project area where military and security personnel are deployed, collect relevant data and communicate with Project stakeholders and beneficiaries; (ii)</p>	<p>ii. Throughout project implementation</p>	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	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.		
4.6	<p>TRAINING FOR THE COMMUNITY</p> <p>i. MoF shall carry out training to heighten awareness of risks and impacts of project activities on local communities, as well as means to mitigate these risks and impacts. Training topics may include stakeholders mapping and engagement, Grievance Management, Occupational Health and Safety measures, Community Health and Safety issues</p>	i. Within 3 months of project commencement.	i. PIU
4.7	<p>GRIEVANCE MECHANISM FOR THE COMMUNITY</p> <p>ii. MoF shall put in place a community grievance redress mechanism consistent with ESS10.</p>	i. Throughout project implementation	i. PIU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE, AND INVOLUNTARY RESETTLEMENT			
5.1	<p>i. In accordance with action 1.5 above, any activities resulting or anticipated to result in permanent or temporary physical or economic displacement shall be ineligible for Project financing as outlined in excluded activities in ESS 1.</p> <p>ii. Screen subprojects to exclude subprojects with land acquisition and resettlement impacts in accordance with the ESMF. The screening mechanism shall also include a protocol requiring subproject application to include documentation that the beneficiary agencies or downstream recipients own any land they will use or will acquire land exclusively on a willing buyer/willing seller basis.</p>	<p>i. Screening to be done during subproject appraisal.</p> <p>ii. Screening and record keeping mechanism developed as part of the ESMF.</p>	<p>i. PIU</p> <p>i. PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	i. Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts on biodiversity, including the identification of different habitats that may be affected by beneficiary agencies' subprojects. These measures shall be included in the ESMF to meet the requirements of ESS6 and the national laws and international conventions that Somalia is a party to, in a manner acceptable to the Association.	i. Throughout project implementation	i. PIU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	iii. Conduct screening and community consultation at each sub-project area and confirm the presence or absence of IP/Sub-Saharan Historically Underserved Traditional Local Communities as per ESS7 to determine the applicability of the standard. If ESS7 groups are found in implementation areas, then IPPPs shall be prepared.	i. In each area before the implementation of sub-projects.	i. PIU
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE AND CHANCE FINDS i. Consistent with the ESMF ensure that ESS8 related measures are included in the ESMPs for subprojects and that such measures are adopted and implemented in a manner acceptable to the Association.	i. Prepare, adopt and publicly disclose the ESMPs prior to implementation of site-specific subprojects	i. PIU
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	LIVESTOCK VALUE CHAIN DE-RISKING FACILITY i. If implementation of the Livestock Value Chain De-Risking Facility sub-component of the Project is assigned (subject to agreement between the Recipient and the	i. The decision to utilize an FI for this sub-component	i. PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Association) to a financial intermediary (fund manager, financial institution), the Recipient shall cause such financial intermediary to put in place and maintain throughout Project implementation an ESMS compliant with ESS 9 and in form and substance satisfactory to the Association to manage E&S risks and impacts of activities supported by the Facility. The ESMS should include:</p> <ul style="list-style-type: none"> a) Details on E&S screening and analysis which should be commensurate to the sub-projects being funded. b) Procedures to assess, manage, and monitor the environmental and social risks and impacts of the activity/ subprojects on an ongoing basis. c) Risk categorization according to low, medium, or high environmental risk to determine the scope of the environmental and social due diligence that shall be necessary to identify risks. d) In case the Facility is not implemented by a Financial Intermediary the ESMF shall apply. 	and the preparation and adoption of an ESMS for that purpose will take place before disbursement for the Livestock Value Chain De-Risking Facility, and will be a condition of disbursement	
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN (SEP) PREPARATION AND IMPLEMENTATION</p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall 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>	Develop, adopt, disclose the SEP at project negotiations, update it in line with the findings of the SA and ESMF by project effectiveness, and thereafter implement the SEP throughout Project implementation	i. PIU
10.2	PROJECT GRIEVANCE MECHANISM		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>i. Implement a functioning, trusted, and accessible Project Grievance Mechanism, as described in the SEP.</p> <p>ii. Accessible grievance arrangements shall be made publicly available to receive and facilitate the resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Association.</p>	<p>i. Two months after Project effectiveness.</p> <p>ii. Throughout project implementation.</p>	<p>i. PIU</p>
CAPACITY SUPPORT (TRAINING)			
11.1	<p>i. A preliminary capacity assessment for the implementation of the E&S requirements shall be carried out as part of the ESMF preparation and shall be updated as necessary following the recruitment and induction of E&S specialists. The capacity assessment shall include terms of reference, an action plan, and the timeline for capacity building activities, including training and mentorship, in the following areas: The World Bank's ESF in general:</p> <ul style="list-style-type: none"> • Stakeholder mapping and engagement; • Training in monitoring and supervision of the implementation of E&S instruments. • Occupational and Community Health and Safety issues • Labor Management; • Specific aspects of environmental and social assessment including preparation of E&S instruments such as ESMF and ESMPs, • Gender Based Violence (GBV); and • Grievance Management. 	<p>i. Part of the ESMF as a condition of project effectiveness.</p> <p>ii. Training shall be carried out throughout the Project as required in accordance with the capacity assessment.</p>	<p>i. PIU</p>