



**REPUBLIC OF KENYA**

**MINISTRY OF AGRICULTURE AND LIVESTOCK DEVELOPMENT  
STATE DEPARTMENT OF CROP DEVELOPMENT**

**FOOD SYSTEMS RESILIENCE PROJECT (FSRP)  
P177816**

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

**MARCH 2023**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Kenya (the Recipient) will implement the Food Systems Resilience Project (the Project), with the involvement of the Ministry of Agriculture and Livestock Development (MoALD) as set out in the Financing Agreement. The International Development Association (the Association), has agreed to provide financing for the Project, as set out in the referred agreement.
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. 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 Ministry of Agriculture and Livestock Development, and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient, Principal Secretary State department of Crop production of the Ministry of Agriculture and Livestock Development. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<b>MONITORING AND REPORTING</b>		
<p><b>A</b>     <b>REGULAR REPORTING</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, status of preparation and implementation of E&amp;S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p> <p>Carry out annual Environmental and Social audits for the sub-projects to establish compliance with the Project’s E&amp;S instruments. These shall be reviewed and cleared by the Association</p>	<p>Submit six-monthly and annual reports to the Association throughout Project implementation, commencing after the Effective Date.</p> <p>Submit each report to the Association no later than 14 days after the end of each reporting period.</p> <p>Submit Environmental and Social Audit Reports annually to the Association no later than 90 days after the end of each reporting period</p>	<p>Ministry of Agriculture and Livestock Development (MoALD)</p>
<p><b>B</b>     <b>INCIDENTS AND ACCIDENTS</b></p> <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 injuries, forced or child labor. 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>Any such incidents/accidents should be promptly reported by the contractor to the National Project Coordination Unit (NPCU) using standard forms contained in the ESMF.</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 reports to the Association within a timeframe acceptable to the Association.</p>	<p>MoALD, NPCU, CPCUs, Contractors</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p><b>C</b></p> <p><b>CONTRACTORS’ MONTHLY REPORTS</b></p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance to County Project Coordination Units (CPCUs) in accordance with the metrics specified in the respective bidding documents and contracts.</p> <p>Require CPCUs to submit a synthesized Report on ESHS performance on quarterly basis to the NPCU Association through the MoALD.</p>	<p>Submit the ESHS Performance Reports to the CPCUs on a monthly basis</p> <p>Submit the Synthesized ESHS Performance Reports to the NPCU on quarterly basis</p>	<p>NPCU, CPCUs, Contractors</p>
<p><b>D</b></p> <p><b>NOTIFICATIONS RELATING TO COMPLIANCE REVIEW OF CONTRACTOR</b></p> <p>Notify the Association of any referral submitted to the Dispute Avoidance and Adjudication Board (DAAB) to initiate a process of compliance review in relation to a contractor’s obligations to prevent and respond to sexual exploitation and abuse (SEA), and/or sexual harassment (SH) specified in the respective works contract with such contractor; and, in the event of any such referral, notify the Association of: (i) the DAAB’s decision on such referral; (ii) the contractor’s Notice of Dissatisfaction, if any, with such DAAB decision; (iii) any notification received on the commencement of an emergency arbitration proceeding or full arbitration proceeding in relation to the DAAB’s decision; and (iv) the resulting emergency arbitration order and/or full arbitration order, if any.</p>	<p>No later than 7 days after the issuance or receipt, as applicable, of the relevant document (i.e., referral to the DAAB, issuance of DAAB decision, Notice of Dissatisfaction, notice of commencement of emergency/full arbitration, emergency/full arbitration order, as applicable).</p>	<p>MoALD, NPCU, CPCUs, Contractors</p>
<p><b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b></p>		
<p><b>1.1</b></p> <p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>MOALD will have the overall responsibility for implementation of the FSRP. MOALD shall maintain a National Project Coordination Unit (NPCU) with qualified staff and resources to support management of ESHS risks and impacts of the Project including 1 full time Environmental Specialist, 1 full time Social Specialist, and 1 full time Communications Specialist. In addition, the NPCU shall recruit the SEA/SH Consultant and the Security Consultant on a part-time basis.</p>	<p>The NPCU is staffed with 1 full time Environmental Specialist, 1 full time Social Specialist, and 1 full time Communications Specialist. The positions shall be maintained throughout Project implementation.</p>	<p>MoALD, NPCU, CPCUs</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>MOALD shall maintain a County Project Coordination Unit (CPCU) within each participating County with qualified staff and resources to support management of environment and social risks of the Project at the County level including 1 Environmental Specialist and 1 Social Specialist</p>	<p>Hire the SEA/SH Consultant prior to Effective Date and thereafter maintain the position throughout Project implementation.</p> <p>Hire the Security Consultant prior to Effective Date and thereafter maintain the position throughout Project implementation</p> <p>Ensure that all CPCUs are staffed with 1 Environmental Specialist and 1 Social Specialist prior to Effective Date and thereafter maintain the positions throughout Project implementation</p>	
<p>1.2 <b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <p>Prepare, consult upon, adopt, publicly disclose and implement the Environmental and Social Management Framework (ESMF) with the following E&amp;S instruments as annexes: Integrated Pest Management Plan (IPMP), ESMP<sup>1</sup> for minor civil works, Waste Management Plan, Labor Management Procedures (LMP), Sexual Exploitation, Abuse and Harassment (SEAH) Prevention and Response Plan, and Security Management Plan (SMP) consistent with the relevant ESSs. In addition, prepare the Resettlement Policy Framework (RPF), and Vulnerable Marginalized Group Framework (VMGF) consistent with the relevant ESSs.</p>	<p>Prepare, consult upon, adopt and publicly disclose the ESMF, RPF and VMGF prior to Effective Date and thereafter implement the ESMF throughout Project implementation.</p> <p>Update the environmental and social framework instruments within 12 months of project effectiveness.</p>	<p>MoALD, NPCU, CPCUs</p>

<sup>1</sup> This ESMP is a template to be adapted as necessary for specific works, and the criteria for its use as opposed to carrying out a site-specific ESIA, will be included in the ESMF

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>Screen every Technical Assistance (TA) activity and sub-project and prepare the relevant instruments including Terms of Reference (ToRs) for the TA activity, ESIA with the corresponding ESMP, or an ESMP for the identified sub-project, VMGP, and LRP as per the guidance and requirements of the ESMF, VMGF, and the RPF during Project implementation.</p> <p>Incorporate the ESIA/ESMP recommendations in the civil Contract documents during implementation and duly comply with any applicable requirements in the ESMF, VMGF and RPF during project implementation.</p> <p>The activities/subprojects described in the exclusion list in Section 1.5 below, and set out in the ESMF shall be ineligible to receive financing under the Project.</p>	<p>Ensure screening of sub-projects and TA activities throughout project implementation.</p> <p>Prepare, consult upon, adopt, publicly disclose the ESIA/ESMPs, LRPs, and VMGPs prior to sub-project approval, and implement in the case of LRPs, prior to the start of sub-project activities.</p> <p>Adopt the ESMP before launching the bidding process for the respective subproject, or prior to the carrying out of subproject activities that require the adoption of such ESMP. Once adopted, implement the respective ESMP throughout Project implementation</p> <p>Prepare ToRs for TA activities before launching the bidding process for each TA activity</p>	
<p>1.3 <b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&amp;S instruments, SEA/SH, Security Management Plan, the Labor Management Procedures, SEP, 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.</p>	<p>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise contractors throughout Project implementation</p>	<p>MoALD, NPCU, CPCUs</p>
<p>1.4 <b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the consultancies, feasibility studies, capacity building, training, and any other technical assistance activities under the Project are carried out in accordance</p>	<p>Throughout Project implementation.</p>	<p>MoALD, NPCU, CPCUs</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>with terms of reference (ToRs) acceptable to the Association, and consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference (ToRs).</p>		
<p>1.5 <b>EXCLUSIONS</b></p> <p>Exclude the following types of activities/sub-projects as ineligible for financing under the project:</p> <ul style="list-style-type: none"> <li>• Activities/sub-projects classified as High Risk under the World Bank Environmental and Social Framework</li> <li>• Activities that have a high probability of causing serious adverse effects to human health and/or the environment.</li> <li>• Activities that may adversely affect lands or rights of Traditional Local Communities or other vulnerable and marginalized groups.</li> <li>• Associated facilities which do not meet the requirements of the ESSs, whether the beneficiaries have, or do not have control or influence over such associated facilities.</li> <li>• Activities that may have significant adverse social impacts and/ or may give rise to significant social or community conflict.</li> <li>• sub-project/ activity with either adverse impacts on land or natural resources under traditional/customary use or have risks associated with the relocation of VMGs coupled with any negative impact on their cultural sites/heritage</li> <li>• Activities that may involve involuntary resettlement or land acquisition (physical relocation of PAPs).</li> <li>• Activities that may involve economic displacement of more than 200 PAPs</li> <li>• Any other excluded activities as set out in the ESMF for the Project.</li> </ul>	<p>Screen all activities/sub-projects against the exclusion list at identification stage and prior to sub-project/activity approval.</p> <p>Where the facilities are controlled by third parties, an ESIA, ESHS Audit, or other similar evaluation shall be carried out on the association before the sub-project is approved</p>	<p>MoALD, NPCU, CPCUs</p>
<p>1.6 <b>CONTINGENT EMERGENCY RESPONSE FINANCING</b></p> <p>a) Ensure that the Immediate Response Mechanism Operation Manual (IRM-OM) includes a description of the ESHS assessment and management arrangements in accordance with the ESSs.</p> <p>b) Adopt any environmental and social (E&amp;S) instruments which may be required for activities under CERC Part of the Project, in accordance with the IRM-OM and the ESSs,</p>	<p>a) The adoption of the IRM-OM in form and substance acceptable to the Association is a withdrawal condition under Section III.B.1(b) of Schedule 2 of the Financing Agreement for the Project.</p>	<p>MoALD, NPCU, CPCU and contractors</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.	b) Adopt any required E&S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation.	
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Prepare, consult upon, adopt, publicly disclose and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers' relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), training of workers on code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors and subcontractors.</p> <p>Implement Occupational, Health and Safety (OHS) measures for workers (including emergency preparedness and response measures) as prescribed in the ESMF, LMP and the World Bank Group EHS General guidelines.</p> <p>Subject to each sub-project's eligibility and permissibility of the use of community workers, ensure for all unremunerated community workers: 1) compliance with the LMP; 2) documentation of voluntary participation; 3) working conditions particularly OHS comply with requirements of ESS2; 4) there is no forced or child labor; and 5) no disadvantage to those who are not able to participate (elderly, disabled, women, etc.) Technical Assistance outputs prepared in line with ESS 2 shall comply with requirements described in Section 1.4</p>	<p>Prepare, consult upon, adopt and publicly disclose the LMP, as part of the ESMF, prior to Effectiveness Date and thereafter implement the LMP throughout Project implementation.</p> <p>Adopt the OHS measures prior to project commencement and thereafter implement them throughout Project implementation. Throughout the project implementation and prior to implementation of sub project involving community contribution of labor.</p>	<p>MoALD NPCU, CPCUs</p> <p>MoALD, NPCU, CPCUs, Contractors</p>
2.2	<b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b>		MoALD



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Establish and operate the labor grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Establish a grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Prepare, consult on, adopt, publicly disclose, and implement the following instruments in line with the ESMF to be prepared under Section 1.2 above:</p> <ul style="list-style-type: none"> <li>i. Integrated Pest Management Plans (IPMPs), including emergency response measures</li> <li>ii. Waste Management Plan to manage hazardous and non-hazardous wastes, consistent with ESS3</li> </ul> <p>Incorporate resource efficiency and pollution prevention and management measures in each subproject ESMP to be prepared under action 1.2 above.</p> <p>Technical Assistance outputs prepared in line with ESS3 shall comply with requirements described in Section 1.4</p>	<p>Adopt and publicly disclose prior to Effective Date and thereafter implement throughout Project implementation</p> <p>Throughout Project implementation</p>	MoALD, NPCU, CPCUs
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESIA/ESMPs to be prepared under action 1.2 above.</p>	Adopt the traffic and road safety measures in the same timeframe as for the adoption and implementation of the ESMPs, and implement throughout Project implementation	MoALD, NPCU, CPCUs
4.2	<b>COMMUNITY HEALTH AND SAFETY</b>		

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, risks to livestock, crop, fodder, and humans associated with inappropriate use of pesticides during spraying; the behavior of Project workers, risks of labor influx, and response to emergency situations in case of significant chemical spills or other health and safety related incidents, and include mitigation measures in the ESIA's and/or ESMPs to be prepared in accordance with the ESMF, and action 1.2 above.</p>	<p>Same timeframe as for the adoption and implementation of the ESMPs.</p>	<p>MoALD, NPCU, CPCUs, contractors</p>
<p><b>4.3 Sexual Exploitation and Abuse (SEA) AND Sexual harassment (SH) RISKS</b></p> <p>Prepare, consult upon, adopt, publicly disclose and implement the Sexual Exploitation and Harassment (SEAH) Prevention and Response Plan to assess and manage the risks of sexual exploitation and abuse (SEA) / and sexual harassment (SH) associated with value chain linked investments, market infrastructure and the provision of other project benefits to small holder farmers.</p> <p>Incorporate SEA/SH mitigation measures, as applicable, in subproject ESMPs to be prepared under action 1.2 above</p>	<p>Prepare and adopt prior to Effective Date and thereafter implement throughout project implementation</p> <p>Throughout project implementation</p>	<p>MoALD, NPCU, CPCUs, Contractors</p>
<p><b>4.4 SECURITY MANAGEMENT</b></p> <p>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. Prepare, adopt, and thereafter implement the Security Management Plan (SMP) consistent with ESS4 and good international practice, in a manner acceptable to the Association, to ensure that the use of security personnel in the project does not result in adverse consequences to the community health and safety, including in matters relating to SEAH. The SMP shall be guided by the principles of proportionality and GIIP, and by applicable national laws, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.</p>	<p>SMP shall be prepared and adopted prior to Effective Date, and thereafter maintained throughout project implementation</p>	<p>MoALD, NPCU, CPCUs, Contractors</p>
<p><b>4.5 CONFLICT</b></p> <p>The Recipient shall implement activities in communal areas under Project in a culturally sensitive manner, avoiding any aggravation of local communal conflicts, different communities / individuals using the same land.</p>	<p>Throughout Project implementation</p>	<p>MoALD, NPCU, CPCUs,</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>		
<p>5.1 <b>RESETTLEMENT POLICY FRAMEWORK</b></p> <p>Prepare, consult upon, adopt, publicly disclose and implement the Resettlement Policy Framework (RPF) for the Project, consistent with ESS5. The RPF shall outline the screening process and exclusion criteria; potential situations of economic loss; eligibility criteria; compensation for economic loss/disturbance allowance; procedures of compensation linked to construction schedule; funding arrangement; implementation arrangement and monitoring arrangement.</p> <p>Ensure the resources required for allocation/granting of land for sub projects as per RPF is budgeted as part of sub project proposal by counties.</p> <p>Ensure that farmers and entities participating in the project have tenure of the land to be used and are not displacing other users of the land. If land is to be donated or voluntarily sold, the process and transaction shall fulfill the requirements of ESS5 and shall be well documented.</p> <p>Should the granting of community lands cause relocation/economic loss for VMGs, the RPF shall include guidance to exclude physical relocation and ensure that these granting of community land are made willingly in accordance to ESS5 criteria and ensures community compensation and the principles underlying FPIC are respected.</p> <p>Ensure that adverse impacts on incomes or livelihoods (if any) that are not a direct result of land acquisition or land use restrictions imposed by the project shall be addressed in accordance with ESS1 and the ESMF prepared under Section 1.2 above.</p> <p>Technical Assistance outputs prepared in line with ESS5 shall comply with requirements described in Section 1.4</p>	<p>Prepare, consult upon, adopt, and publicly disclose the RPF prior to Effectiveness Date and thereafter implement the RPF throughout Project implementation.</p> <p>Ensure budget for allocation /granting of land as per RPF, if any prior to sub project approval.</p> <p>All due diligence on the land, compensation, documentation of allocation/granting of land, etc. must be completed before initiation of the respective works</p>	<p>MoALD, NPCU, CPCUs</p>
<p>5.2 <b>LIVELIHOODS RESTORATION</b></p> <p>Prepare consult upon, adopt, disclose and implement Livelihood Restoration Plans (LRP) for each activity and sub-project under the Project for which the RPF requires such LRP, consistent with ESS5.</p>		<p>M MoALD, NPCU, CPCUs</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Ensure LRPs are budgeted and included in ESMP costs.	Prepare, consult upon, adopt, disclose and implement the respective LRP as part of the ESMP before the commencement of construction works of subprojects including ensuring that before taking possession of the land, the LRP is fully implemented.	
5.3	<p><b>EXCLUSIONS</b></p> <p>In line with exclusions under Section 1.6 above, activities or investments that may involve involuntary resettlement or land acquisition (physical relocation of PAPs), or those that may involve economic displacement of more than 200 PAPs shall be excluded from the Project.</p>		
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p><b>BIODIVERSITY RISKS AND IMPACTS</b></p> <p>Relevant aspects of this standard shall be considered, as needed, in the ESMF prepared under Section 1.2.</p> <p>The Recipient shall screen sub-projects, prepare, consult upon, adopt, publicly disclose, ESIA or ESMPs with relevant measures for management of risks and impacts on biodiversity, consistent with ESS6. The Recipient shall screen and exclude sub-projects and activities that are likely to have impacts on biodiversity, critical habitats and protected areas.</p> <p>Technical Assistance outputs prepared in line with ESS6 shall comply with requirements described in Section 1.4</p>	Adopt the ESMP before launching the bidding process for the respective subproject that requires the adoption of such ESMP. Once adopted, implement the respective ESMP throughout Project implementation	MoALD, NPCU, CPCUs
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	<b>VULNERABLE AND MARGINALIZED GROUPS FRAMEWORK</b>		MoALD, NPCU, CPCUs

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Prepare, consult upon, adopt, publicly disclose and implement a Vulnerable and Marginalized Group Framework (VMGF) for the Project, consistent with ESS7.	Prepare consult upon, adopt, and disclose the project’s VMGF prior to Effectiveness Date and thereafter implement the VMGF throughout Project implementation	
7.2	<p><b>VULNERABLE AND MARGINALIZED GROUP PLAN (VMGP)</b></p> <p>Prepare, adopt, publicly disclose and implement the VMGP for each subproject identified in PICD under the Project as set out in the VMGF and consistent with ESS7. This will include measures to ensure that subprojects are implemented in a manner that provides VMGs with equitable access to project benefits.</p> <p>As set out in the VMGF and consistent with ESS7, ensure PICD process and output is informed by the Social Assessment (SA) that determines any specific risks resulting from the interaction between local social structures (culture, traditional institutions, and habits) and livelihood systems with the project activities and outline ways of engaging with VMGs and establish further measures as necessary to ensure their participation in the project activities.</p> <p>Update SEP, RPF, VMGF based on the outputs of SA.</p>	<p>Prepare, adopt and publicly disclose the VMGP prior to to the carrying out of subproject that requires the adoption of such VMGP and once adopted, implement the respective VMGP throughout Project implementation.</p> <p>The Social Assessment (SA) shall be carried out prior to initiating Participatory Integrated Community Development (PICD) for each of the 13 participating counties.</p>	MoALD, NPCU, CPCUs
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<p><b>CULTURAL HERITAGE RISKS AND IMPACTS</b></p> <p>Adopt and implement a Cultural Heritage Management Plan (CHMP) as part of the ESMF, and in accordance with the guidelines of the ESIA and/or ESMP prepared for relevant sub-project, and consistent with ESS8.</p>	Adopt the CHMP in the same timeframe as for the adoption and implementation of the ESMFs, and thereafter implement the CHMP throughout Project implementation.	MoALD, NPCU, CPCUs, Contractors
8.2	<p><b>CHANCE FINDS</b></p> <p>Relevant aspects of this ESS8 shall be considered, as needed, in the ESMF, and in the ESIA/ESMPs to be prepared under action 1.2 above.</p>	Adopt the Chance Finds Procedures in the same timeframe as for the adoption and implementation of the ESMFs, and thereafter implement the procedures throughout Project implementation	MoALD, NPCU, CPCUs, Contractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
	<b>Not Relevant.</b>		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b></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> <p>Update the SEP to include input from the Social Assessments and the SEA/SH action plan as needed.</p>	<p>Stakeholder Engagement Plan is disclosed prior to appraisal and shall be implemented throughout Project implementation.</p> <p>The SEP shall be updated within 12 months of project effectiveness and when/if necessary, along the project cycle.</p>	MoALD, NPCU, CPCUs, Contractors
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>Establish publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate the 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>Establish the grievance mechanism prior to Effective Date, and thereafter maintain and operate the mechanism throughout Project implementation.</p>	MoALD, NPCU, CPCUs, Contractors
<b>CAPACITY SUPPORT</b>			
CS1	<p>Training may be required for MoALD NPCU and CPCU staff on:</p> <ul style="list-style-type: none"> <li>• Environment and Social Framework (ESF)</li> <li>• WBG EHS Guidelines</li> </ul>	During project implementation	MoALD, NPCU, CPCUs

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none"> <li>• Environmental and Social Management Framework (ESMF) including Labor Management Procedures (LMP) consisting of Code of Conduct for project workers in relevant languages and Labor Specific GRM,</li> <li>• Environmental and Social Management Plans (ESMPs)</li> <li>• SEA/SH Action Plan</li> <li>• Social Assessment, PICD and Vulnerable and Marginalized Groups Plan</li> <li>• Stakeholder Engagement Plan</li> <li>• Project wide GRM</li> <li>• Security Management Plan</li> <li>• Any additional training based on the capacity needs assessment outlined in the ESMF</li> </ul>		
<p>CS2 Training may be required for Recipient’s Ministries, Counties, Departments and Agencies staff on:</p> <ul style="list-style-type: none"> <li>• Environmental and social legal requirements;</li> <li>• ESIA methodology and process;</li> <li>• Environmental and social impact determination (tools and methods);</li> <li>• Mitigation hierarchy (Avoid, Minimize, Restore &amp; Offset (AMRO));</li> <li>• Stakeholder mapping and engagement;</li> <li>• PICD and the VMGF</li> <li>• ESMP preparation and monitoring techniques; and</li> <li>• Preparation of ESIA ToRs, LRP ToR, VMGP ToR and others.</li> <li>• SEA/SA Action Plan</li> <li>• Security Management Plan</li> </ul>	During project implementation	MoALD, County Governments, Identified Ministries, Departments and Agencies
<p>CS3 Project workers shall be trained on:</p> <ul style="list-style-type: none"> <li>• Occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.</li> <li>• Gender-Based Violence/ SEA-SH prevention and response measures.</li> <li>• Workers Grievance Management.</li> <li>• Labor Management Procedures</li> <li>• SEA/SH Action Plan</li> <li>• Relevant sub-project ESMP</li> <li>• Security Management Plan</li> </ul>	During project implementation	MoALD, NPCU, CPCUs, Contractors

