REPUBLIC OF CABO VERDE

Improving Connectivity and Urban Infrastructure Project (P178644)

Draft

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

[September, 2023]

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

- 1. The Republic of Cabo Verde (the Borrower) shall implement the Project Improving Connectivity and Urban Infrastructure (the Project) with the involvement of the Ministry of Infrastructure, Territorial Planning and Housing (MIOTH), as set out in the Financing Agreement. The International Bank for Reconstruction and Development/International Development Association (the World Bank) has agreed to provide the original financing of the Project (P178644), as set out in the referred agreement(s). This ESCP supersedes previous versions of the ESCP for the PPA of Project.
- 2. The Borrower shall ensure that the Activities are carried out in accordance with the Environmental and Social Standards (ESSs) of the World Bank and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the World Bank. 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(s).
- 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 have been developed and/or are to be developed for the Project that shall be adopted under the Activities, all of which shall be subject to prior consultation and disclosure, consistent with ESS10, and in form and substance, and in a manner acceptable to the World Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the World Bank.
- 4. As agreed by the World Bank and the Borrower, this ESCP will be revised from time to time if necessary, during the implementation of the Activities, to reflect adaptive management of changes and unforeseen circumstances related to the Activities or in response to assessment of performance of the Activities. In such circumstances, the Borrower through the Ministry of Finance, in coordination with MIOTH, and the World Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the World Bank and the Republic of Cabo Verde, through the Minister for Finance. The Borrower shall promptly disclose the updated ESCP.

MATER	IAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE
			ENTITY/AUTHORITY
MONIT	ORING AND REPORTING		
Α	REGULAR REPORTING	Submit quarterly reports to	Responsibility: MIOTH
		the World Bank throughout	Environmental and
	Prepare and submit to the World Bank regular monitoring reports on the environmental, social,	the project implementation,	Social Specialists.
	health and safety (ESHS) performance of the Project, including but not limited to the	starting from the Effective	
		Date, Submit each report to	Accountability: Project
	required under the ESCP, stakeholder engagement activities, and the functioning of the grievance	the World Bank on an	Coordinator.
	mechanism(s).	agreed format, not later	
		than fifteen (15) days after	
	The Project Operations Manual (POM) shall contain an annex with the minimum content of the	the end of each reporting	
	report.	period. The reporting	
		format will be agreed by	
		First Implementation	
		Support Mission.	

MATER	RIAL MEASURES AND ACTIONS		RESPONSIBLE
			ENTITY/AUTHORITY
В	INCIDENTS AND ACCIDENTS	1. In case of, accident or	Responsibility: MIOTH
	Promptly notify the World Bank of any incident or accident related to or having a direct impact on	incident related to cases of	
	the Project, or likely to have a significant adverse effect on the environment (including e.g., water	sexual exploitation and	
	pollution, soils contamination, air emissions, flora and fauna disturbances), the affected	abuse (SEA), sexual	-
		` ''	
	communities, the general public or workers. Indicative examples: any accident or incident related		Accountability: Project
	to cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result	accidents that result in	
	in death, serious or multiple injury.	death, the Borrower notify the World Bank	
	Duravida sufficient datail respective the season revenity, and respital serves of the incident or		
	Provide sufficient detail regarding the scope, severity, and possible causes of the incident or	immediately within	
	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.	twenty-four (24) hours.	
		2. For any other incidents or	
	Subsequently, at the World Bank's request, a report of the incident or accident shall be prepared	accidents notify the World	
	and the corresponding measures to prevent its recurrence shall be submitted.	Bank no later than forty-	
		eight (48) hours after	
	The Project Operation Manual (POM) shall contain an annex of the minimum content of the	learning of the incident or	
	respective accident reports.	accident.	
		3. Provide investigation	
		report to the World Bank,	
		within one week.	
		Throughout Project	
		implementation.	
		•	

MATE	RIAL MEASURES AND ACTIONS		RESPONSIBLE ENTITY/AUTHORITY
С	CONTRACTORS MONTHLY REPORTS	Contractor reports to be submitted to the Supervising	Responsibility: MIOTH
	Require contractors and supervising firms to provide monthly reports on the level of compliance with ESSs requirements particularly for civil works.	Engineer on a weekly basis.	Social Specialists.
	These reports shall ensure that contractors provide details on their oversight of environmental,	The Supervising Engineer	Accountability: Project Coordinator.
	social, health and safety (ESHS) performance as enshrined in the ESMP, C-ESMP, and LMP. These	-	
	reports shall be generated from the field by construction site supervisors recruited under the Project	•	
	and submitted to the Borrower for onward reporting to the World Bank.	reports to be submitted to	
		the World Bank on a	
		quarterly basis.	
ESS 1:	ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		
1.1	ORGANIZATIONAL STRUCTURE		UGPE and MIOTH
		strengthened with a Social	
	Maintain the UGPE structure with qualified staff and resources to support the management of E&S		
	risks and impacts of the Project, including: one Environmental Specialist and one Social Specialist;	three (3) months after	
	adequate resources shall be allocated to ensure that the planned tasks are carried out effectively.	Project Approval by the	
		Bank and will be maintained	
	MIOTH shall establish and maintain an Environmental and Social (E&S) Team with suitably qualified		
	and experienced personnel to support the management of E&S risks and impacts of the Project,	implementation.	
	including the following full-time positions: One Environmental Specialist and one Social Specialist.		
	The Environmental Specialist and the Social Specialist must have experience and qualifications in	At least one Environmental	
	accordance with terms of reference acceptable to the World Bank and be hired or appointed based	•	
	on those terms of reference.	Specialist shall be recruited	
		by MIOTH no later than	
		three (3) months after	
		Project Approval by the	
		Bank.	
		Thereafter maintain these	
		positions throughout	
		Project implementation.	

1.2 **ENVIRONMENTAL AND SOCIAL INSTRUMENTS:**

- 1. Prepare, disclose, consult, and adopt for the Project an Environmental and Social Management LMP and RPF are prepared MIOTH Framework (ESMF), a Stakeholder Engagement Plan (SEP), Labor Management Procedures (LPM), and a Resettlement Planning Framework (RPF). The Project ESMF includes a sexual exploitation and abuse/sexual harassment (SEA/SH) risk assessment and Action Plan, and Chance-find procedures.
- 2. For identified project areas, the Borrower shall prepare, disclose, adopt, and implement any environmental and social assessments including Environmental and Social Impact Assessment 2. Any (ESIA) and/or Environmental and Social Management Plans (ESMP), Health and safety plans (HSP), WHO guidelines on COVID-19, and other relevant Good International Industry Practice (GIIP), all in accordance with the ESSs. The environmental and social assessment will be conducted in accordance with ESS1, and will consider, in an integrated way, all relevant direct, indirect and cumulative environmental and social risks and impacts of the project.
- 3. Cause the contractors to prepare/update/adopt and implement site-specific ESMPs (C-ESMPs) consistent with the relevant ESSs, for the rehabilitation/refurbishment of existing infrastructure, as set out in the ESMF for these subprojects. The C-ESMPs shall include SEA/SH risk mitigation and response measures in line with those included in the ESMF. Proposed activities described in the exclusion list established in the ESMF shall not be eligible to receive 3. Cause the contractors to funding under the Project.
- 4. The Borrower shall identify EHSS requirements relevant to the subprojects and to any Associated Facilities in a manner proportionate to its control and assess and manage ESHS risks and impacts of subprojects in accordance with ESSs and ESMF prepared for the project in a manner acceptable to the World Bank.
- 5. For subprojects with anticipated physical and/or economic displacement impacts, the Borrower 4. Resettlement Plans (RPs) shall prepare, consult, disclose, adopt, and implement Resettlement Plans for the relevant areas in accordance with ESS5.

- 1. The project SEP, ESMF, instruments) and and disclosed by Appraisal (implementation). and will be adopted and implemented throughout Project implementation.
- subsequent ESIAs/ESMPs shall be prepared, disclosed, adopted prior to the launch of corresponding civil works. Once adopted, implement the site-specific **ESIAs** and **ESMPs** throughout Project implementation.
- adopt the C-ESMPs before the commencement of any works and thereafter implement them throughout Project implementation.
- shall be developed. consulted, disclosed, adopted, and implemented relevant for the subprojects before the commencement of civil

UGPE (preparation of

MATE	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
		works.	
1.3	MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.	procurement documents and prior to call for bids.	Responsibility: MIOTH Environmental and Social Specialists.
	specifications of their respective contracts.	Supervise contractors throughout project implementation.	Accountability: Project Coordinator.
1.4	TECHNICAL ASSISTANCE	Throughout Project implementation.	UGPE Environmental and Social Specialists.
	Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project, including, inter alia, the preparation of all ESF instruments are carried out in accordance with terms of reference acceptable to the World Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.		
1.5	contingent emergency response financing a) Ensure that the CERC-ESMF addendum includes a description of the ESHS assessment and management arrangements for the implementation of the CERC component, in accordance with the ESSs.	a) Prior to the start of design/civil works under CERC and maintained throughout Project implementation.	MIOTH Environmental and Social Specialists.
	b) Adopt any environmental and social (E&S) instruments which may be required for activities under CERC component of the Project, in accordance with the CERC-ESMF addendum and the ESSs, 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.	

MATER	IAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE
			ENTITY/AUTHORITY
		Implement the E&S	
		instruments in accordance	
		with their terms,	
		throughout Project	
		implementation.	

/ATE	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE
			ENTITY/AUTHORITY
	LABOR AND WORKING CONDITIONS		I
2.1	LABOR MANAGEMENT PROCEDURES	LMP is prepared and	UGPE (preparation –
	The Borrower, through UGPE, shall prepare, consult, adopt, disclose and implement Labor Management	disclosed before appraisal	disclosure of LMP).
	Procedures (LMP), that comply with applicable national legislation and ESS 2, for the Project and sub-	and shall be adopted and	MoU with IGT
		implemented by Effective	NAIGTH /Ib as a b ECV
		Date and throughout	MIOTH (through ECV
	mechanisms for Project workers, the recruitment and project management process.	Project implementation.	and ICV) –
	· · ·	MoU with IGT to be signed before the start of	implementation, with the institutional
	be included in the ESHS specifications of the procurement documents and contracts with contractors and supervising engineers.	implementation (works).	support of Labor
	The Supervising Engineers will supervise the implementation of the CESMPs and COHSPs and will have in	implementation (works).	General Inspectorate
	their teams Environmental Specialists with relevant qualifications and experience in Health and Safety		and the appointmen
	management of construction works, as well as experienced Social Specialists.		of Supervising
	During the implementation, the Borrower provides project's workers the following measures:		Engineers.
	 Provide workers with information and documentation that is clear and understandable regarding their 		Liigineers.
	terms and conditions of employment through written contracts setting out their rights, including, inter		
	alia, rights related to hours of work, wages, overtime, compensation and benefits, as well as written		
	notice of termination of employment, and details of severance payments, as applicable;		
	 Implement occupational health and safety (including personal protective equipment, and emergency 		
	preparedness and response) measures, taking into account the General Environmental, Health and		
	Safety Guidelines (EHSGs), and other relevant Good International Industry Practice (GIIP) and, as		
	appropriate, the industry-specific EHSGs and other Good International Industry Practice (GIIP);		
	• Implement measures, as applicable, to, inter alia: (i) prevent the use of all forms of forced labor and		
	child labor; (ii) enable workers to benefit from, inter alia, access to grievance and redress		
	mechanisms without fear of retaliation; and effective freedom to form and join workers		
	organizations or alternative mechanisms for expressing their concerns and protect their rights		
	related to labor and working conditions;		
	Develop a code of conduct for workers, which shall include measures to prevent and respond to		
	SEA/SH cases;		
	• Incorporate the relevant requirements above in the ESHS specifications of the procurement		
	documents and contracts with third parties that engage workers in the implementation of the		
	Activities.		
	UGPE to prepare a MoU with the Labor General Inspectorate (Inspecção Geral do Trabalho – IGT) for the		
	institutional Support during the implementation of the Project		

MATER	RIAL MEASURES AND ACTIONS		RESPONSIBLE ENTITY/AUTHORITY
2.2	 Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2, including procedures to report SEA/SH incidents in an ethical and confidential manner, following a survivor-centered approach. Include the grievance mechanism as a part of the procurement documents for the supervising firms and the contractors, with stipulations that they include similar provisions in agreements with 	1. Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	UGPE, in coordination with the MIOTH Environmental and Social Specialists and implementation by Project contractors.

MATE	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE
			ENTITY/AUTHORITY
2.3	OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES	1. Prior to launching the	MIOTH (through ICV
	1. Incorporate relevant OHS measures, in procurement documents and contracts for all consulting	procurement processes	and ECV) and the
	firms, service providers, contractors, and supervision firms.	and signing contracts.	implementation by
			project contractors.
	2. Develop and include in the site-specific ESIAs/ESMPs a detailed Occupational Health and Safety	-	
	Management Plan (OHSMP) consistent with national regulations, Good International Industry		
	Practices (GIIP) and the World Bank Group General Environmental, Health and Safety Guidelines	The state of the s	
	(EHSG).	adopted and implemented	
		prior to the launch of	
	3. Cause contractors to develop and include in the C-ESMPs a detailed OHSMP consistent with	, ,	
	national regulations, GIIP and the World Bank Group General EHSG.	Once adopted, implement	
		the site-specific ESIAs and	
		ESMPs throughout Project	
		implementation.	
		3. Cause the contractors to	
		adopt the C-ESMPs before the commencement of any	
		works and thereafter	
		implement them	
		throughout Project	
		implementation.	
		implementation.	
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MATER	RIAL MEASURES AND ACTIONS		RESPONSIBLE ENTITY/AUTHORITY
ESS 3 F	RESOURCE EFFICIENCY, POLLUTION PREVENTION AND MANAGEMENT		
3.1	WASTE AND HAZARDOUS MATERIALS MANAGEMENT: Incorporate appropriate waste management measures in the ESMF to manage hazardous and non-hazardous wastes, consistent with ESS3.	Prior to the start of the works and maintained during the implementation of the project.	UGPE MIOTH (through ECV and ICV) / Contractors Supervising Engineers
	The Borrower shall ensure that the project contractors develop and implement to the waste and hazardous materials (such as hydrocarbons, oil filters, etc.), a waste management plan, commonly as part of the ESIA and/or ESMP, where relevant, to manage risks in a manner acceptable to the World Bank. The Borrower shall ensure adoption of climate co-benefits, energy and water efficiency measures consistent with ESS3, as guided in the ESMF, and as per the national law, guidelines and policies and ensure proper disposal of construction waste. These measures will be incorporated, where applicable, into the design of each Project activity as applicable, and implemented through the ESMPs. For all subproject activities, assess impacts (through ESIA) from waste generation (including hazardous waste), pollution emissions and discharges, including GHG emissions where likely to be significant, and prepare and implement proportionate mitigation measures through ESMPs.	Climate co-benefits, energy and water efficiency measures will be carried out throughout the Project implementation.	
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.2 above.	Any subsequent ESIA/ESMP shall be prepared, disclosed, adopted prior to the launch of corresponding civil works. Once adopted, implement the site-specific ESIAs and ESMPs throughout Project implementation	_

MATER	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 4:	COMMUNITY HEALTH AND SAFETY		
4.1	Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.2 above.	throughout implementation of the	UGPE MIOTH (through ECV and ICV)/ Contractors Supervising Engineers
4.2	The Borrower, through ECV and ICV, shall ensure that project contractors develop and implement measures and actions to assess and manage specific risks and impacts to the community arising from project activities, including those related to the presence of project workers and any risks	In the execution phase of the works and maintained throughout the implementation of the Project.	MIOTH (through ECV and ICV)/ Contractors Supervising Engineers

MATER	RIAL MEASURES AND ACTIONS		RESPONSIBLE ENTITY/AUTHORITY
4.3	A Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) risk assessment has been conducted for the project. The SEA/SH Action Plan including measures to manage those risks shall be prepared adopted, and implemented. It shall contain a set of measures to increase accountability, prevent and mitigate the risk of SEA/SH, including but not limited to developing codes of conduct for workers and promoting SEA/SH awareness training for project workers and other stakeholders.	SEA/SH risk assessment has been conducted as part of the ESMF. It will be disclosed by Appraisal, adopted, and implemented throughout	UGPE ICIEG and IGT Contractors MIOTH (ECV and ICV)/ Contractors Supervising Engineers
ESS 5:	LAND ACQUISITION, LAND USE RESTRICTIONS AND INVOLUNTARY RESETTLEMENT		
5.1		The Project RPF will be disclosed by Appraisal and be adopted and implemented throughout Project implementation.	UGPE (preparation of RPF). Implementation: MIOTH with the involvement of ECV, ICV, and DGPCP.

		RESPONSIBLE
For identified project sites, prepare, disclose, adopt, and implement resettlement plans (RPs) consistent with ESS5, in accordance with information and template included in the RPF if required and in a manner acceptable to the World Bank. The General Directorate of Heritage and Public Procurement (Direcção-Geral do Património e Contratação Pública — DGPCP) is formally the governmental institution with the responsibility to conduct the land acquisition processes for projects of public interest under the national legal requirements and shall be involved in any processes relating to land acquisition while MIOTH shall remain responsible for implementation. The General Directorate of Heritage and Public Procurement (Direcção-Geral do Património e implementation with the responsibility to conduct the land acquisition processes for projects of public interest under the national legal requirements and shall be involved in any processes relating to land acquisition while MIOTH shall ensure poss relations and interest under the national legal requirements and shall be involved in any processes relating to land acquisition while MIOTH shall ensure poss relations.	or subprojects where hysical and/or economic splacement impacts are spected, Resettlement ans shall be prepared and aplemented prior to the	ENTITY/AUTHORITY UGPE (preparation of Resettlement Plans) Implementation: MIOTH with the involvement of ECV, ICV, and DGPCP.

MATER	RIAL MEASURES AND ACTIONS		RESPONSIBLE ENTITY/AUTHORITY	
ESS 6:	ESS 6: CONSERVATION OF BIODIVERSITY AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	The Borrower shall ensure sustainable management of biological natural resources through good	In the execution phase of the works and maintained throughout Project implementation.	MIOTH (ECV and ICV) / Contractors Supervising Engineers Ministry of Agriculture and Environment / National Environment Directorate (DNA)	
6.2	 a. Apply the ESMF and measures to screen subproject site and to exclude activities in protected areas. b. Biodiversity risk and impact assessments will be conducted as part of each of the project's Environmental and Social Assessments and measures to manage these risks will be included in the ESIAs/ESMPs. These ESIAs/ESMPs will include mitigation measures taking into account the principle of the mitigation hierarchy, as defined in paragraph 27 of the ESS 1 of the ESF. 	The project ESMF will be prepared and disclosed by Appraisal and be adopted and implemented throughout Project implementation. These management	UGPE (preparation of ESMF) Implementation: MIOTH (ECV and ICV) / Contractors Supervising Engineers Ministry of Agriculture and Environment / DNA	

MATER	RIAL MEASURES AND ACTIONS		RESPONSIBLE ENTITY/AUTHORITY
ESS 8 :	CULTURAL HERITAGE		
8.1	CHANCE FINDS: The Borrower, through UGPE, shall describe a chance find procedures in the project's ESMF, to be implemented by MIOTH (ECV and ICV). The ESMF, through the subproject screening process, shall ensure that any sites with or near cultural heritage are identified and any necessary measures taken. Chance find procedures clauses shall be included in all work contracts in case any cultural heritage is unexpectedly found.	Throughout Project implementation.	UGPE (preparation of the ESMF) Implementation: MIOTH (ECV and ICV) / Contractors Supervising Engineers / Ministry of Culture and Creative Industries / Cultural Heritage
FCC 40	CTAKELIOLDED ENGAGENETAND INFORMATION DIGGLOCUDE		Institute
10.1		-	UGPE (preparation of the SEP). MIOTH (implementation).

MA	ATER	IAL MEASURES AND ACTIONS		RESPONSIBLE ENTITY/AUTHORITY
10	0.2	PROJECT GRIEVANCE MECHANISM	Adapt the GM used by UGPE for other World Bank-	UGPE in coordination with MIOTH.
		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	financed projects to the Project, adopt by Efectiveness Date, and maintain it throughout Project implementation.	
		The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH grievances, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.		

CAPACITY BUILDING

Activities	Beneficiary	Program
CB1 Training Module - WB ESF and ESS	Project Staff based in UGPE (ESS, M&E-S, Procurement,	1st quarter of the 1st
	financial), MIOTH (ICV and ECV)	year of
	DNA and DGPCP staff.	implementation
CB2 Training Module - Environmental and Social, design and	Project Staff based in UGPE (ESS, M&E-S, Procurement,	1st quarter of the 1st
implementation of a training module on the following aspects:	financial), MIOTH (ICV and ECV)	year of
Screening instrument for sub-projects selection process	DNA a staff.	implementation
(environmental and social checklist);	Non-governmental organizations (NGOs)	
National environmental policies, procedures and legislation;	Community based World Banks.	
Knowledge of the process for monitoring the implementation		
of the ESMP and RPF.		
CB3 Training Module - Occupational Health and Safety:	Project staff based in UGPE, ICV and ECV	Beginning of the
Individual and collective protective equipment;	Contractors staff.	work
Risk management in the workplace;	Supervising engineer staff	
Prevention of work-related accidents;		
Health and safety rules;		
Solid and liquid waste management;		
Emergency preparedness and response.		
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CB4 Training module - Working conditions:	Project staff based in UGPE, ICV and ECV	Beginning of the
Work conditions in accordance with the national laws and	Contractors staff.	work
regulations in force;	Supervising engineers staff	
Code of conduct for employers and contracted staff.		
➤ GRM for workers – grievance submission and redress		
procedures		
CB5 Training Module – Grievance Mechanism: design and	Project Staff in UGPE, ICV and ECV	1 st quarter of the 1st
production of a training module covering the following	Municipalities staff	year of
aspects:	Non-governmental organizations (NGOs)	implementation
Classification of complaints;	Community based World Banks	
Registration and grievance redress procedures;	Community leadership.	
Recording, documentation and handling of grievances;		
Allocation of rules and responsibilities of the GRM		
organizational structures;		
Level of processing, types of authorities and		
affiliation.		
CB6 Training module - GBV/SEA/SH risk module:	Project Staff in UGPE, ICV and ECV	Before the start of
Awareness raising and measures to prevent and mitigate	Municipalities staff	the project activities.
GBV/SEA/SH risks:	Civil society, Non-governmental organizations (NGOs)	Starts in 1 st quarter
Prevention and response to GBV/SEA/SH based on Cabo	Community based World Banks, including Women's World Banks	of the 1st year of
Verdean laws and regulations	Community leadership	implementation, and
Survivors Services provider;	Contractors staff	continues
GBV/SEA/SH complaint management	Supervising engineers staff	throughout project
Themes, activities and target groups shall be developed in the		implementation with
GBV action plan.		annual refresher
		courses.
CB7 Training module - ESS5 Land Acquisition, Restrictions on	Project Staff based in UGPE, ICV, ECV and DGPCP	Before the start of
Land Use and Involuntary Resettlement	Design / ESIA consultants	the project activities
		and whenever new
		design / ESIA
		consultants are
		appointed