

# REPUBLIC OF CABO VERDE

## Improving Connectivity and Urban Infrastructure Project (P178644)

### Draft ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

[August, 2023]

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Cabo Verde (the Borrower) shall implement the Project Improving Connectivity and Urban Infrastructure 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 World Bank, (hereinafter the World Bank), acting as the international financial institution of the Republic of Cabo Verde, through the Unidade de Gestão de Projetos Especiais (UGPE, serving as Project Implementing Unit), has agreed to provide financing of the Project, as set out in the agreement. This ESCP supersedes previous versions of the ESCP for the PPA of Project.
2. The Borrower 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, namely the Environmental and Social Management Framework (ESMF), Resettlement Planning Framework (RFP), Stakeholder Engagement Plan (SEP), and Labor Management Procedures (LMP) as well as a Gender Based Violence (GBV) Action Plan, site-specific Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs), and Resettlement Action Plans (RAPs), 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 Unidade de Gestão de Projectos Especiais 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 Minister for Finance .The Borrower shall promptly disclose the updated ESCP.

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

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

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
C	<p><b>CONTRACTORS MONTHLY REPORTS</b></p> <p>Require contractors and supervising firms to provide monthly reports on the level of compliance with ESSs requirements particularly for civil works.</p> <p>These reports shall ensure that contractors provide details on their oversight of environmental, 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.</p>	<p>Contractor reports to be submitted to the Supervising Engineer on a weekly basis.</p> <p>The Supervising Engineer reports to be submitted to the Borrower on a monthly basis, and the Borrower reports to be submitted to the World Bank on quarterly basis.</p>	<p>Responsibility: UGPE Environmental and Social Specialists/team</p> <p>Accountability: UGPE Coordinator</p>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Maintain the UGPE structure with qualified staff and resources to support management of E&amp;S risks and impacts of the Project, including : an environmental specialist and a social specialist; adequate resources shall be allocated to ensure that the planned tasks are carried out effectively.</p> <p>As implementing agencies, ECV and ICV organizations will be reinforced with an environmental and social specialist each.</p>	<p>The UGPE structure is established, but will be reinforced with a Social Specialist and this will be maintained during project implementation.</p> <p>Two E&amp;S specialists shall be recruited for ECV and ICV (one for each institution) prior to the procurement of works, works-design, and supervision contracts and maintained during the implementation of the project.</p>	UGPE, ECV and ICV

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.2	<p><b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS:</b></p> <ol style="list-style-type: none"> <li>1. Prepare, disclose, consult and adopt for the Project an Environmental and Social Management Framework (ESMF), a Labor Management Procedures (LPM) and a Resettlement Planning Framework (RPF). The Project ESMF shall include a gender-based violence (GBV) and sexual exploitation and abuse/sexual harassment (SEA/SH) risk assessment and Action Plan, and Chance-find procedures.</li> <li>2. For identified project area, the Borrower shall prepare, disclose, adopt, and implement any environmental and social assessments including Environmental and Social Impact Assessment (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.</li> <li>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 funding under the Project.</li> <li>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.</li> </ol>	<ol style="list-style-type: none"> <li>1. The project SEP, ESMF, LMP and RPF are prepared and disclosed by Appraisal and will be adopted and implemented throughout Project implementation.</li> <li>2. Any subsequent ESIA/ESMP shall be prepared, disclosed, adopted and implemented prior to the launch of corresponding civil works. Once adopted, implement the site-specific ESIA and ESMPs throughout Project implementation.</li> <li>3. Cause the contractors to adopt the C-ESMPs before the commencement of any works and thereafter implement them throughout Project implementation.</li> </ol>	UGPE, ECV and ICV

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&amp;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.</p>	<p>As part of preparation of procurement documents and prior to call for bids.</p> <p>Supervise contractors throughout project implementation.</p>	<p>Responsibility: UGPE Environmental and Social Specialists/team</p> <p>Accountability: UGPE Coordinator</p>
1.4	<p><b>TECHNICAL ASSISTANCE</b></p> <p>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.</p>	Throughout Project implementation.	UGPE Environmental and Social Specialists/team
1.5	<p><b>CONTINGENT EMERGENCY RESPONSE FINANCING</b></p> <p>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.</p> <p>b) Adopt any environmental and social (E&amp;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&amp;S instruments, within the timeframes specified in said E&amp;S instruments.</p>	<p>a) Prior to the start of design/civil works under CERC and maintained throughout Project implementation.</p> <p>b) Adopt any required E&amp;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&amp;S instrument is required. Implement the E&amp;S instruments in accordance</p>	UGPE Environmental and Social Specialists/team

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
		with their terms, throughout Project implementation.	



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>The Borrower, through UGPE shall prepare, consult, adopt, disclose and implement Labor Management Procedures (LMP), that comply with applicable national legislation and ESS 2, for the Project and sub-projects, including through, inter alia, occupational, health and safety measures (including personal protective equipment, and emergency preparedness and response measures), setting out grievance mechanisms for Project workers, the recruitment and project management process.</p> <p>The preparation of Labor Management Plans in compliance with the Labor Management Procedures will be included in the ESHS specifications of the procurement documents and contracts with contractors and supervising engineers.</p> <p>The Supervising Engineers will supervise the implementation of the CESMPs and COHSPs and will have in their teams Environmental Specialists with relevant qualifications and experience in Health and Safety management of construction works, as well as experienced Social Specialists.</p> <p>During the implementation, the Borrower provides project's workers the following measures:</p> <ul style="list-style-type: none"> <li>• Provide workers with information and documentation that is clear and understandable regarding their 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;</li> <li>• 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 (EHSs), and other relevant Good International Industry Practice (GIIP) and, as appropriate, the industry-specific EHSs and other Good International Industry Practice (GIIP);</li> <li>• 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;</li> <li>• Develop a code of conduct for workers, which shall include measures to prevent and respond to SEA/SH cases;</li> <li>• 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.</li> </ul> <p>UGPE to prepare a MoU with the Labor General Inspectorate (Inspeção Geral do Trabalho – IGT) for the institutional Support during the implementation of the Project</p>	<p>LMP is prepared and disclosed before appraisal and shall be adopted and implemented by Effective Date throughout Project implementation.</p> <p>MoU with IGT to be signed before start of implementation (works)</p>	<p>UGPE (preparation – disclosure of LMP). MoU with IGT ECV and ICV – implementation, with the institutional support of Labor General Inspectorate and the appointment of Supervising Engineers</p>

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2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <ol style="list-style-type: none"> <li>1. 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.</li> <li>2. 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 their subcontractors before the start of Project works.</li> <li>3. Disseminate and explain the grievance mechanism for Project workers to contractors' workers.</li> </ol>	<ol style="list-style-type: none"> <li>1. Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.</li> <li>2. Before launching the procurement processes.</li> <li>3. Information about GRM shall be disseminated to project workers and PAPs prior to the commencement of works and throughout Project implementation.</li> </ol>	UGPE, with the support of ICV and ECV and the implementation by the contractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <ol style="list-style-type: none"> <li>1. Incorporate relevant OHS measures, in procurement documents and contracts for all consulting firms, service providers, contractors, and supervision firms.</li> <li>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 (EHSG).</li> <li>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.</li> </ol>	<ol style="list-style-type: none"> <li>4. Prior to launching the procurement processes and signing contracts.</li> <li>5. Any subsequent ESIA/ESMP shall be prepared, disclosed, adopted and implemented prior to the launch of corresponding civil works. Once adopted, implement the site-specific ESIAs and ESMPs throughout Project implementation.</li> <li>6. Cause the contractors to adopt the C-ESMPs before the commencement of any works and thereafter implement them throughout Project implementation.</li> </ol>	UGPE, with the support of ICV and ECV and the implementation by the contractors

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<b>ESS 3 RESOURCE EFFICIENCY, POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>WASTE AND HAZARDOUS MATERIALS MANAGEMENT:</b></p> <p>Incorporate appropriate waste management measures in the ESMF to manage hazardous and non-hazardous wastes, consistent with ESS3</p> <p>The Borrower, through ECV and ICV shall ensure that the project contractors develop and implement to the waste and hazardous materials (such as hydrocarbons, oil filters, etc.), an 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.</p> <p>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.</p> <p>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.</p>	<p>Prior to the start of the works and maintained during the implementation of the project.</p> <p>Climate co-benefits, energy and water efficiency measures will be carried out throughout the Project implementation.</p>	UGPE ECV and ICV / Contractors Supervising Engineers
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.2 above.</p>	Any subsequent ESIA/ESMP shall be prepared, disclosed, adopted and implemented prior to the launch of corresponding civil works. Once adopted, implement the site-specific ESIAs and ESMPs throughout Project implementation	UGPE ECV and ICV / Contractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 4 : COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>ROAD SAFETY AND TRAFFIC:</b></p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.2 above</p> <p>The Borrower, through ECV and ICV shall ensure that the project contractors develop and implement road safety plans, in particular a traffic plan for construction equipment (if required).</p> <p>UGPE shall ensure that the project contractors implement properly prepared and marked access routes to the shipyards.</p>	Prior to the start of the work and maintained during the implementation of the project	UGPE ECV and ICV / Contractors Supervising Engineers
4.2	<p><b>COMMUNITY HEALTH AND SAFETY:</b></p> <p>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 related to labor recruitment as required in the ESMF in actions 1.2 above.</p>	In the execution phase of the work and maintained during the implementation of the project.	ECV and ICV / Contractors Supervising Engineers

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.3	<p><b>GBV AND SEA/SH RISKS:</b></p> <p>A gender-based violence (GBV) risk assessment is prepared for the project. The GBV/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 GBV, and mitigate the risk of GBV, including but not limited to developing codes of conduct for workers and promoting GBV risk awareness training for project stakeholders.</p>	<p>GBV/SEA/SH risk assessment is concluded as part of the ESMF. It will be disclosed, adopted and implemented throughout Project implementation.</p> <p>The GBV action plan shall be completed no later than six months after the project is approved by the World Bank and after the specifics site of subprojects are known.</p> <p>Codes of conduct signed by workers and training provided prior to the start of project activities.</p>	<p>UGPE ICIEG and IGT Contractors ECV and ICV / Contractors Supervising Engineers</p>
<b>ESS 5: LAND ACQUISITION, LAND USE RESTRICTIONS AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<p><b>RESETTLEMENT PLANNING FRAMEWORK</b></p> <p>Prepare, disclose, consult and adopt for the Project a Resettlement Planning Framework (RPF) for the unidentified project sites as required and in accordance with the ESS5 and relevant national legislation.</p>	<p>The Project RPF will be disclosed by Appraisal and be adopted and implemented throughout Project implementation.</p>	<p>UGPE</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
5.2	<p><b>RESETTLEMENT PLANS</b></p> <p>For identified project sites, prepare, disclose, adopt, and implement resettlement action plans (RAPs) consistent with ESS5, in accordance with information and template included in the RPF if required and in a manner acceptable to the World Bank.</p> <p>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.</p>	<p>Any subsequent Resettlement Action Plans shall be prepared and implemented prior to the launch of corresponding civil works.</p> <p>The RAP (s) shall be adopted and implemented, including ensuring that before taking possession of the land and related assets, full compensation has been provided and [as applicable] displaced people have been resettled and moving allowances have been provided.</p>	<p>UGPE, with the involvement of ECV, ICV and DGPCP</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 6: CONSERVATION OF BIODIVERSITY AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p><b>SUSTAINABLE MANAGEMENT OF BIOLOGICAL NATURAL RESOURCES:</b></p> <p>The Borrower, through ECV and ICV shall ensure sustainable management of biological natural resources through good management practices and the use of available technological tools</p>	In the execution phase of the work and maintained during the implementation of the project.	ECV and ICV / Contractors Supervising Engineers  Ministry of Agriculture and Environment / National Environment Directorate (DNA)
6.2	<p><b>PROTECTED AREAS/BIODIVERSITY CONSERVATION:</b></p> <p>The Borrower assess the subproject risks and impacts on biodiversity and implement bio-diversity management plan as part of subprojects ESMPs.</p> <p>a. Apply ESMF and measures to screen subproject site within designated protected areas, if applicable.</p> <p>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.</p>	<p>The project ESMF will be prepared and disclosed during to Appraisal and be adopted and implemented throughout Project implementation</p> <p>These management procedures are systematically included in the ESIAs/ESMPs and in the Contractors contracts.</p>	<p>UGPE (preparation of ESMF)</p> <p>Implementation: ECV and ICV / Contractors Supervising Engineers</p> <p>Ministry of Agriculture and Environment / DNA</p>



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 8 : CULTURAL HERITAGE</b>			
8.1	<p><b>CHANCE FINDS :</b></p> <p>The Borrower, through UGPE shall describe a chance find procedures in the project's ESMF, to be implemented by ECV and ICV.</p> <p>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.</p>	During the implementation of the project.	<p>UGPE (preparation of the ESMF)</p> <p>Implementation: ECV and ICV / Contractors Supervising Engineers Ministry of Culture and Creative Industries / Cultural Heritage Institute</p>
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE PREPARATION AND IMPLEMENTATION OF THE STAKEHOLDER ENGAGEMENT PLAN:</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>	The SEP will be disclosed by Appraisal and will be adopted and implemented throughout Project implementation.	UGPE

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	Adapt the GM used by UGPE for other World Bank-financed projects to the Project, adopt by Effectiveness Date and maintained during project implementation.	UGPE

#### CAPACITY BUILDING

Activities	Beneficiary	Program
<b>CB1 Training Module - WB ESF and ESS</b>	Project Staff based in UGPE (ESS, M&E-S, Procurement, financial), MIOTH (ICV and ECV) DNA and DGPCP staff.	1st quarter of the 1st year of implementation
<b>CB2 Training Module - Environmental and Social</b> , design and implementation of a training module on the following aspects: <ul style="list-style-type: none"> <li>➤ Screening instrument for sub-projects selection process (environmental and social checklist);</li> <li>➤ National environmental policies, procedures and legislation;</li> <li>➤ Knowledge of the process for monitoring the implementation of the ESMP and RPF.</li> </ul>	Project Staff based in UGPE (ESS, M&E-S, Procurement, financial), MIOTH (ICV and ECV) DNA a staff. Non-governmental organizations (NGOs) Community based World Banks.	1st quarter of the 1st year of implementation
<b>CB3 Training Module - Occupational Health and Safety:</b> <ul style="list-style-type: none"> <li>➤ Individual and collective protective equipment;</li> <li>➤ Risk management in the workplace;</li> <li>➤ Prevention of work-related accidents;</li> <li>➤ Health and safety rules;</li> <li>➤ Solid and liquid waste management;</li> <li>➤ Emergency preparedness and response.</li> </ul>	Project staff based in UGPE, ICV and ECV Contractors staff. Supervising engineer staff	Beginning of the work

<b>CB4 Training module - Working conditions:</b> <ul style="list-style-type: none"> <li>➤ Work conditions in accordance with the national laws and regulations in force;</li> <li>➤ Code of conduct for employers and contracted staff.</li> <li>➤ GRM for workers – grievance submission and redress procedures</li> </ul>	Project staff based in UGPE, ICV and ECV Contractors staff. Supervising engineers staff	Beginning of the work
<b>CB5 Training Module – Grievance Mechanism:</b> design and production of a training module covering the following aspects: <ul style="list-style-type: none"> <li>➤ Classification of complaints;</li> <li>➤ Registration and grievance redress procedures;</li> <li>➤ Recording, documentation and handling of grievances;</li> <li>➤ Allocation of rules and responsibilities of the GRM organizational structures;</li> <li>➤ Level of processing, types of authorities and affiliation.</li> </ul>	Project Staff in UGPE, ICV and ECV Municipalities staff Non-governmental organizations (NGOs) Community based World Banks Community leadership.	1 <sup>st</sup> quarter of the 1st year of implementation
<b>CB6 Training module - GBV/SEA/SH risk module:</b> Awareness raising and measures to prevent and mitigate GBV/SEA/SH risks: <ul style="list-style-type: none"> <li>➤ Prevention and response to GBV/SEA/SH based on Cabo Verdean laws and regulations</li> <li>➤ Survivors Services provider;</li> <li>➤ GBV/SEA/SH complaint management</li> <li>➤ Themes, activities and target groups shall be developed in the GBV action plan.</li> </ul>	Project Staff in UGPE, ICV and ECV Municipalities staff Civil society, Non-governmental organizations (NGOs) Community based World Banks, including Women’s World Banks Community leadership Contractors staff Supervising engineers staff	Before the start of the project activities. Starts in 1 <sup>st</sup> quarter of the 1st year of implementation, and continues throughout project implementation with annual refresher courses.
<b>CB7 Training module - ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</b>	Project Staff based in UGPE, ICV, ECV and DGPCP Design / ESIA consultants	Before the start of the project activities and whenever new design / ESIA consultants are appointed