



**MINISTRY OF AGRICULTURE AND LIVESTOCK DEVELOPMENT
(MOALD)**

STATE DEPARTMENT FOR AGRICULTURE

KENYA AGRICONNECT IMPLEMENTATION SUPPORT PROJECT (KAIS)

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

Final

September 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Kenya (the Recipient) will implement Kenya Agriconnect Implementation Support Project (KAIS) (the Project), with the involvement of the Ministry of Agriculture and Livestock Development (MoALD), as set out in the [Financing] Agreement (the Agreement[s]) The [International Bank for Reconstruction and International Development Association (the [Bank/Association])] acting as the implementing entity has agreed to provide financing for the Project, as set out in Agreement[s].
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Financing Agreement[s]. 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 Recipient shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreement[s], the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Representative specified in the Agreement[s] or the Ministry of agriculture and Livestock Development. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	ORGANIZATIONAL STRUCTURE MOALD will have the overall responsibility for coordination of the Kenya Agriconnect Implementation Support Project (KAIS). MOALD shall maintain a National Project Coordination Unit (NPCU) with dedicated, experienced and qualified staff and financial resources to support management of ESHS risks and impacts associated with the Project. Throughout the life of the project, the NPCU shall maintain at least 1 (one) full-time Environmental Specialist, 1 (one) full-time Social Specialist, 1 (one) full-time SEA/SH Consultant and 1(one) full-time Communications Specialist. In addition, the NPCU shall recruit/deploy a Security focal person on a part-time basis. For all Project activities the participating counties shall each maintain an organizational structure with qualified staff and resources to support management of environment and social risks of the Project; including the hiring and deployment of qualified and experienced Environmental Specialist and Social Safeguards Specialist to support the County Project Coordination unit (CPCU) on this Project to complement the staff at post.	Establish a National Project Coordination Unit (NPCU) and hire one environment specialist, one social specialist, one SEA/SH Specialist and one communication specialist prior to Project Effective Date and maintained throughout project implementation. Hire/deploy the Security focal person prior to disbursement of funds and thereafter maintain the position on part time basis throughout the project implementation. Ensure that CPCUs are staffed with one Environment Specialist and, one Social Specialist prior to county disbursement of funds and thereafter maintain the positions throughout Project implementation.	Ministry of Agriculture & Livestock Development and the county Governments.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	CAPACITY BUILDING PLAN/MEASURES Prepare and implement the following capacity building measures: • Environmental and social screening • Resource efficiency and Pollution Prevention and Management • involuntary resettlement and land donation • Biodiversity Conservation and Sustainable Management of Living Natural Resources • Stakeholder engagement and grievance management • Labor and working conditions, including child labor • Occupational Health and Safety • Communities Health and Safety • Gender-based violence (GBV), Sexual Exploitation, Abuse and Sexual Harassment (SEA/SH) • Cultural heritage and Chance find management Any additional training based on the capacity needs assessment outlined in the ESMF	Provide training to the NPCU within 90 days of project effectiveness and CPCU before disbursement of funds and thereafter refresher training yearly throughout implementation	MoALD, NPCU, and CPCUs
MONITORING AND REPORTING			
C	REGULAR REPORTING Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include: • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. • Number and status of resolution of incidents and accidents reported under action E below.	Submit Quarterly and annual reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association not later than 15 days after the end of each reporting period.	Ministry of Agriculture and Livestock Development (MoALD)
D	CONTRACTORS' MONTHLY REPORTS Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the [Bank/Association]. Require CPCUs to submit a synthesized report on ESHS performance on biannually basis to the NPCU Association through the MoALD.	Submit the ESHS Performance Reports to the CPCUs monthly. Submit the Synthesized ESHS Performance Reports to the NPCU on quarterly basis.	NPCU, CPCUs, Contractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		Submit the monthly reports to the Association, upon request, as annexes to the reports submitted under Action C above.	
E	INCIDENTS AND ACCIDENTS Notify the [Bank/Association] of any incident or accident relating 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 those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the [Bank/Association] upon request. Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the [Bank/Association], and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.	Notify the Association no later than 48 hours after learning of the incident or accident. Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.	MoALD, NPCU, CPCUs, Contractors
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS 1. Prepare and implement an Environmental and Social Management Framework (ESMF) for the Project, with the following E&S instruments as annexes: Integrated Pest Management Plan (IPMP), ESMP for minor civil works, Waste Management Plan, Labor Management Procedures (LMP), Vulnerable and Marginalized Groups Framework, Resettlement Policy Framework, draft Sexual Exploitation, Abuse and Harassment Prevention and Response Plan (SEA/SH PRAP), and Security Management Plan (SMP) consistent with the relevant ESSs. - The ESMF will include an exclusion list. Screen activities/ sub-projects throughout Project implementation to ensure that activities in the ESMF exclusion list are not financed under the Project. 2. Prepare and implement an Environmental and Social Impact Assessment (ESIA) for any activity requiring ESIA as per the screening results.	Prepare and adopt the ESMF with all annexes prior to project effectiveness and implementation throughout the project implementation. Prepare ESIA's prior to the start of any activity requiring the preparation of such instruments and thereafter implement the ESIA throughout Project implementation.	Ministry of Agriculture and Livestock Development, NPCU, CPCUs

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	3. Ensure that the NPCU, CPCUs, contractors, and subcontractors associated with sub-projects adopt and implement the sub-project /site-specific ESIA as set out in the ESMF and consistent with the relevant ESSs.	Prepare the ESIA and incorporate the ESMP as part of the respective bidding documents for the respective Project activity, prior to carrying out an activity that requires the preparation of such ESMP. Once finalized, implement the respective ESMP throughout the related activity implementation.	
1.2	MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, the ESMPs, LMP, SEAH Prevention and Response Plan and County level SRAs and SMPs, into the ESHS specifications of the procurement documents with contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts. a) Provide copies of the relevant contracts with contractors/subcontractors to the Association before commencement of works. b) Develop and implement procedures (LMP, CoC, C-ESMP, ESHS) for managing primary suppliers, community workers, contractors and subcontractors recruited to carry out civil works including inter alia: c) Ensure compliance with the national laws, e.g., licenses to construct, excavate, and operate any sites for project purposes; d) Relevant environmental and social requirements shall be included in the procurement and contracting process including bidding documents, contracts and subcontracts consistent with the requirements of ESSs; e) Preparation of a detailed contractor-ESMP (C-ESMP) that is costed, with sufficient budget, to mitigate E&S risks and demonstrates sufficient capacity to implement the required measures shall be prepared by selected bidder prior to contract signature; f) Codes of conduct (CoCs) are required for contractors, subcontractors, primary suppliers and their workers covering conditions of service, OHS, SEAH and security and included in construction contracts;	i. As part of the preparation of procurement documents and respective contracts. ii. Supervise the contractors throughout project implementation	Ministry of Agriculture and Livestock Development, NPCU and CPCUs

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	g) Monitor contractor commitment and compliance with ESSs; h) Provide GRM for contractors and subcontractor, primary suppliers, communities and other stakeholders as well as employees; in addition, the contractors will provide internal prior to commencement of works. i) Ensure contractors and primary suppliers provide details on their oversight on environmental, social, health and safety (ESHS) performance and adequate mechanisms for serious incident reporting within 24 hours as required; j) Monitor the performance of the contractors and primary suppliers to ensure that they comply with the ESHS specifications of their respective contracts in accordance with the ESMF, SEP, LMP, Sexual Exploitation, Abuse and Harassment (SEAH) Prevention and Response Plan, and Security Management k) Plan and site-specific assessments and plans. l) Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts.		
1.3	TECHNICAL ASSISTANCE Carry out the consultancies, studies (including feasibility studies, if applicable), capacity NPCU training, and any other technical assistance activities under the Project, in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter, prepare and finalize the output of such activities in compliance with the terms of reference.	Throughout Project implementation.	MoALD, NPCU, CPCUs
1.4	CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING 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. b) Adopt any environmental and social (E&S) instruments which may be required for activities under CERC Part of the Project, in accordance with the IRM-OM 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.	a) The adoption of the IRM-OM in form and substance acceptable to the Association is a withdrawal condition under Section III.B.1(d) of Schedule 2 of the Financing Agreement for the Project.	MoALD, NPCU, CPCU and contractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		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.	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES 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. 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.) The Recipient shall ensure a non-discriminatory, decent work environment; including ensuring that all direct and contracted workers adhere to the professional code of conduct developed as part of the LMP.	Prepare and adopt the LMP before project effectiveness and implement it throughout project implementation Throughout project implementation	MoALD NPCU, CPCUs
2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN	Sametime frame as 1.1 above and implement it throughout project implementation. t	MoALD, NPCU, CPCUs, Contractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	The Recipient shall prepare and implement adequate occupational health and safety measures for workers (including emergency preparedness and response measures) in line with the ESMF/IPMF, LMP and World Bank Group EHS General guidelines.		
2.3	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate the labor grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Establish the workers grievance mechanism prior to Effective Date and thereafter maintain and operate the mechanism throughout Project implementation.	MoALD, NPCU, CPCU,
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Prepare and implement a Waste Management Plan (WMP), as part of the ESMP prepared for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS3.	Prepare the WMP prior to effective date and thereafter implement the WMP throughout Project implementation.	MoALD, NPCU, CPCUs
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Prepare, consult on, adopt, publicly disclose, and implement the following instruments in line with the ESMF to be prepared under Section 1.2 above: i Integrated Pest Management Plans (IPMPs), including emergency response measures Incorporate resource efficiency and pollution prevention and management measures in each subproject ESMP to be prepared under action 1.1 above. Technical Assistance outputs prepared in line with ESS3 shall comply with requirements described in Section 1.3	Prepare and adopt and publicly disclose prior to Effective Date and thereafter implement throughout Project implementation	MoALD, NPCU, CPCUs
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the ESIAs/ESMPs to be prepared under action 1.1 above.	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	COMMUNITY HEALTH AND SAFETY	Same timeframe as for the preparation and implementation of the ESMPs.	MoALD, NPCU, CPCUs, contractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	The Recipient shall assess, manage, and monitor biological hazards and food safety risks associated with project-supported activities, including livestock production, fisheries, food processing, storage, transportation, and marketing facilities. The Recipient shall prepare and implement measures, as part of the ESMF, ESMPs, IPMPs, and facility management plans, to prevent zoonotic disease transmission, manage biosecurity risks, ensure food hygiene and safety, maintain water quality standards, manage animal and organic wastes, establish disease surveillance mechanisms, and implement emergency response procedures for outbreaks and food contamination incidents. These measures shall be implemented throughout project implementation and in accordance with national regulations and GIIP.		
4.3	SEA AND SH RISKS Prepare, consult upon, adopt, publicly disclose and implement the Sexual Exploitation, abuse 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. Incorporate SEA/SH mitigation measures, as applicable, in subproject ESMPs to be prepared under action 1.1 above.	Prepare a draft SEA/SH prior to Effective Date and final SEA/SH within six months after effectiveness and implement throughout project implementation period Throughout project implementation period	MoALD, NPCU, CPCUs, contractors
4.4	SECURITY MANAGEMENT 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 Good International Industry Practice (GIIP), and by applicable national laws, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.	SMP shall be prepared and adopted prior to Effective Date, and thereafter maintained throughout project implementation period	MoALD, NPCU, CPCUs, contractors
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
5.1	RESETTLEMENT [FRAMEWORK] [PLAN] or [PLANS] Prepare, consult upon, adopt, publicly disclose the Resettlement Policy Framework (RPF) for the Project, consistent with ESS5. The RPF shall outline the screening process and exclusion criteria Allocate resources for compensation and livelihood restoration Prepare, consult upon, adopt, disclose and implement the site-specific RAP and LRP (as required) before possession of the land, and fully implemented.	Prepare, consult upon, adopt, and publicly disclose the RPF prior to Effectiveness Date and thereafter implement the RPF throughout Project implementation. Budget will be allocated and confirmed prior to sub project approval. All due diligence on the land, compensation, documentation of allocation/granting of land, etc. must be completed before initiation of the respective works Prepare, consult upon, adopt, disclose and implement the RAP and LRP as part of the before possession of the land, the RAP and LRP is fully implemented.	MoALD, NPCU, CPCUs
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS The Recipient shall assess, avoid, minimize, mitigate, and monitor biodiversity risks and impacts associated with project-supported activities. The Recipient shall implement biodiversity screening procedures under the ESMF, exclude activities located in critical habitats or causing significant conversion of natural habitats, and prepare site-specific ESMPs, ESIA, or Biodiversity Management Plans (BMP) where required. Measures shall include protection of natural habitats, riparian ecosystems, wetlands, and ecosystem services; application of climate-smart agriculture and sustainable land management practices; implementation of IPMF/IPMP measures; prevention of invasive species; restoration of disturbed habitats; and monitoring of biodiversity performance throughout project implementation.	Prepare, adopt and publicly disclose the ESMPs, ESIA or BMP prior to implementation of site-specific subprojects. Fully implement all subproject ESMPs.	MoALD, NPCU, CPCUs
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
7.1	INDIGENOUS PEOPLES [FRAMEWORK] [PLAN] or [PLANS] 1. Prepare, consult upon, adopt, publicly disclose and implement a Vulnerable and Marginalized Group Framework (VMGF) for the Project, consistent with ESS7. 2. 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.	Prepare consult upon, adopt, and disclose the project's VMGF prior to Effectiveness Date and thereafter implement the VMGF throughout Project implementation Prepare, adopt and publicly disclose the VMGP prior to the carrying out of subproject that requires the adoption of such VMGP and once adopted, implement the respective VMGP throughout Project implementation.	MoALD, NPCU, CPCUs
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS 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 ESS 8.	Adopt the CHMP in the same timeframe as for the adoption and implementation of the ESMPs and thereafter implement the CHMP throughout Project implementation.	MoALD, NPCU, CPCUs, Contractors
8.2	CHANCE FINDS Relevant aspects of ESS 8 shall be considered, as needed, in the ESMF, and in the ESIAs/ESMPs to be prepared under action 1.1 above.	Adopt the Chance Finds Procedures in the same timeframe as for the adoption and implementation of the ESMPs, and thereafter implement the procedures throughout Project implementation period	MoALD, NPCU, CPCUs, Contractors
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	Implementation of <i>Subcomponent 2.3 Agricultural Finance, De-Risking, and Private Investment Facilitation</i> of the Project will require (subject to agreement between the Recipient and the Association) a financial intermediary (fund manager, financial institution), the Recipient shall cause such financial intermediary to put in place and maintain throughout Project implementation an ESMS compliant with ESS 9 and in form	Preparation and adoption of an ESMS prior to disbursement	NPCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	and substance satisfactory to the Association to manage E&S risks and impacts of activities supported by the Facility. The ESMS should include: a) Details on E&S screening and analysis which should be commensurate to the sub-projects being funded. b) Procedures to assess, manage, and monitor the environmental and social risks and impacts of the activity/ subprojects on an ongoing basis. c) Risk categorization according to low, medium, or high environmental risk to determine the scope of the environmental and social due diligence that shall be necessary to identify risks. d) Financial Intermediaries will not finance on lending to substantial and high risk projects e) Lending activities that involve involuntary land acquisition, significant Biodiversity risks, IP and significant ESS8 issues are not eligible for MSME finance f) In case the Facility is not implemented by a Financial Intermediary the ESMF shall apply.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN Prepare, 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 Implement the SEP consistent with ESS10, including the use of different, culturally appropriate communication approaches to ensure communication also with the most vulnerable, IP/SSAHUTLC, including illiterate, and people with disabilities.	Stakeholder Engagement Plan is disclosed prior to appraisal and shall be implemented throughout Project implementation. The SEP shall be updated within 12 months of project effectiveness and when/if necessary, along the project life cycle.	MoALD, NPCU, CPCUs, Contractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.2	PROJECT GRIEVANCE MECHANISM 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. 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.	Establish the grievance mechanism prior to Effective Date and thereafter maintain and operate the mechanism throughout Project implementation.	MoALD, NPCU, CPCUs, Contractors
INDICATORS FOR IMPLEMENTATION READINESS			
A, 1.1 (1), 2.1, 4.3, 4.4, 5.1,7.1 (1). 10.1 and 10.2			