

Republic of South Sudan

Ministry of Finance and Planning

South Sudan Enhancing Community Resilience and Local Governance Project Phase II (ECRP-II, P177093) - Additional Financing (ECRP-II AF, P180785)

Updated

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

**1 February 2022, amended 13 April 2023 to include
ECRP-II AF**

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of South Sudan (**Recipient**) is implementing the South Sudan Enhancing Community Resilience and Local Governance Project Phase II (**ECRP-II**), with the involvement of the Ministry of Finance and Planning (**MoFP**), the Local Government Board (**LGB**) as the implementing agencies and the International Organization for Migration (**IOM**) contracted by the Recipient as an Implementing Partner, as set out in the Financing Agreement. The International Development Association (hereinafter the **Association**) provides financing for the Project. The Recipient will implement the ECRP-II Additional Financing (the **Project**) with the involvement of the **MoFP**, the **LGB** as the implementing agencies, and IOM and International Non-Governmental Organizations (INGOs) contracted by the Recipient as Implementing Partners. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for Project referred to above.
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, through the MoFP, 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 MoFP and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient, through the MoFP. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING:</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&S documents required under the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	<p>Quarterly reporting throughout Project implementation every 45 days after the end of each quarter. IOM and other Implementing Partners to provide their quarterly progress report to the PMU 30 days after the end of each quarter to be incorporated. Submit each report to the Association no later than 15 days after the end of each reporting period.</p>	<p>Responsibility: MoFP</p> <p>Accountability: Project Management Unit (PMU)</p>
B	<p>INCIDENTS AND ACCIDENTS:</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 injury [specify other examples of incidents and accidents, as appropriate for the type of operation. 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 supervising entity, as appropriate.</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, and Implementing Partners to the PMU within 36 hours, after learning of the incident or accident using such reporting formats as the Association may specify.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association.</p>	<p>Responsibility: MoFP</p> <p>Accountability: PMU</p>
C	<p>CONTRACTORS’ MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts, and submit such reports to the Association.</p>	<p>Submit the monthly reports to the Association upon request as annexes to the reports to be submitted under action A above.</p>	<p>Contractors or Supervising firms</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
D	<p>NOTIFICATIONS RELATING TO DAAB COMPLIANCE REVIEW OF CONTRACTOR COMPLIANCE WITH SEA/SH PREVENTION AND RESPONSE OBLIGATIONS</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>Responsibility: MoFP</p> <p>Accountability: PMU</p>
<p>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</p>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p>ORGANIZATIONAL STRUCTURE:</p> <p>The PMU shall maintain a functional environmental and social risk management organizational structure throughout Project implementation with qualified staff: one Environmental & one Social Safeguards Specialist, shared with the Public Financial Management Project at the central level and focal points at the local level and resources to support management of ESHS risks and impacts of the Project. Further technical support will be provided by the IOM and other Implementing Partners.</p> <p>IOM was contracted 60 days from the Effectiveness Date of the parent project. The PMU reviews IOM's E&S performance on a quarterly basis. IOM is staffed with one Environmental Safeguards Specialist and one Social Safeguards Specialist. Other Implementing Partners each will be staffed with one Environmental and Social Safeguards Specialist. All responsibilities and reporting obligation are cascaded down to all Implementing Partners. All Implementing Partners will complete a capacity assessment with a timeline and clear budget requirements to close the capacity gaps.</p> <p>Mobilize additional staff as needed to ensure the sound environmental and social management of the Project on short-term or long-term assignment in accordance with the ESMF institutional assessment/needs (including the needs and capacity of 1) IOM / other Implementing Partners and 2) community-based needs/capacity – in particular related to construction OHS risks and operational phase EHS risks/impacts to be undertaken including subject matter specialists on GBV/SEA, labor conditions (including child labor, forced labor, health & safety), social inclusion, and land and resettlement.</p> <p>The PMU contracts a third-party monitoring agent (TPMA). The TPMA, among other responsibilities, monitors Environmental Social Health and Safety (ESHS) compliance in all project components, including compliance with this ESCP by all Implementing Partners. The Terms of Reference of the TPM has clear roles and deliverables for its engagement, as per Project Operations Manual (POM).</p>	<p>Maintain throughout Project implementation.</p>	<p>Responsibility: MoFP, IOM and other Implementing Partners</p>

<p>1.2</p>	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT:</p> <p>a) Overall Project: Update, consult and implement an Environmental and Social Management Framework (ESMF) for the Project on the terms specified in 1.3. The ESMF includes scoping of environmental and social risks and impacts of the Project subprojects and identifies appropriate mitigation and monitoring measures. Flood control initiatives or subprojects that present high environmental or social risk must be screened out and excluded from investment.</p> <p>b) Implement community infrastructure subproject screening: to ensure proportionate E&S assessments and tools are prepared, i.e., ESIA's or ESMPs, and the identified subprojects that return a "Substantial" or "high" environmental and/or social risk including those that result in physical displacement or those that are sited within or in proximity to sensitive environmental ecosystems or habitats, among other exclusion criteria detailed in the ESMF are screened out.</p> <p>c) Implement Flood risk reduction subproject screening: to ensure the proposed flood risk reduction activities are well-sited outside sensitive environmental habitats and have minimal land displacement impacts. The process ensures the operation and maintenance regime of such flood risk reduction activities are reviewed by experienced and qualified engineers. Subprojects that have a "high" environmental and/or social risk are screened out.</p>	<p>The ECRP II ESMF to be updated, consulted upon and disclosed prior to disbursement of AF and thereafter implemented throughout Project implementation.</p> <p>Prior to signing of the contracts for flood risk reduction investments. No activities can be implemented until the recommended applicable E&S risk management tools are prepared, consulted on and disclosed.</p>	<p>Responsibility: MoFP</p> <p>Accountability: PMU.</p>
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MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.3 ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>a) Overall Project: Update, adopt, disclose and maintain the ECRP II ESMF (including a detailed process for screening of both community infrastructure subprojects as well as flood risk reduction investments), RPF, and SRA/SMP prepared under ECRP II. The ESMF to be updated shall include:</p> <ul style="list-style-type: none"> • Overall project-wide Environmental and Social risks assessment in line with ESS1-ESS10. • Standardized management and mitigation procedures for handling environmental and social risks • Labor Management Procedures (LMP), including measures for community worker OHS risks and workers’ Grievance Redress Mechanism (GRM) • Social assessment including risks of discrimination, community tensions (including tensions between refugees and host communities), and violence and respective mitigation measures in a social management plan • Gender-Based Violence /Sexual Abuse and Exploitation (SEA)/Sexual Harassment (SH) Action Plan • Procedures for screening of E&S risks and impacts of subprojects consistent with the ESSs and the exclusion list in action 1.5 of this ESCP • Procedures to prepare subproject specific E&S risk management instruments, such as ESMPs and sub-project specific E&S terms and conditions for contracts and agreements • Procedures for Management of Contractors and subprojects involving Community Workers • Organizational structure and resource planning • Monitoring and reporting system • Capacity Building and Training <p>The ESMF shall be updated and implemented in a manner satisfactory to the Association and shall be disclosed in country and on the Recipient’s website.</p>	<p>ESMF, RPF, and SRA/SMP shall be updated and adopted prior to AF disbursement and thereafter implemented throughout Project implementation.</p>	<p>Responsibility: MoFP</p> <p>Accountability: PMU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p>MANAGEMENT OF CONTRACTORS AND IMPLEMENTING PARTNERS:</p> <p>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.</p> <p>Develop and implement site-specific instruments (ESMPs, RAPs,) consistent with the updated ESMF for ECRP-II AF and the ESSs;</p> <p>Adopt and enforce procedures for managing contractors, subcontractors, and implementing partners, and ensure their compliance with the updated ESMF and ESSs, including the following:</p> <ul style="list-style-type: none"> • environmental and social requirements based on the ESMPs shall be included in the procurement and contracting process including bidding documents, for potential civil works. • codes of conduct shall be required for all workers of contractors, subcontractors, primary suppliers and community workers • preparation of a detailed construction-ESMP (C-ESMP) that is costed, with sufficient budget to mitigate E&S risks • monitor contractor commitment and compliance with ESSs • provide GRM for contractors and subcontractors, affected communities and other stakeholders • ensure that contractors and implementing partners provide details on their environmental, social, health and safety (ESHS) performance monthly to the PMU. • A requirement for contractors and implementing partners to implement a GRM to handle concerns of their employees • A requirement for contractors and implementing partners to have a Labor Management Plan that conforms to the requirements of the updated LMP for ECRP-II AF and ESS2 	<p>Prior to the preparation of procurement documents.</p> <p>Maintain procedures throughout Project implementation</p>	<p>Responsibility: MoFP</p> <p>Accountability: PMU, Contractors and Supervising Firms</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.5	<p>EXCLUSIONS</p> <p>Exclude the following types of activities as ineligible for financing under the Project for both categories of investments and in CERC (Component 5) activities:</p> <p>(a) Exclusions under the community infrastructure subprojects Subprojects that contain substantial to high environmental and social risk impacts. These subprojects are included in the exclusion list applied during screening. Examples include: Dams; power stations; industrial installations (refineries, chemical installations); long distance roads, rail, transmission lines (water, power); waste treatment and disposal installations; large water and wastewater treatment plants; river basin or land development; large-scale irrigation ; projects in critical habitats and protected areas; projects involving significant quantities of hazardous substances; activities leading to involuntary resettlement, land acquisition and restrictions to land us; Industrial installations (refineries, chemical installations) among others. List to be updated during screening</p> <p>(b) Exclusions under the flood risk reduction activities Subprojects that have a “high” environmental and/or social risk will be screened out. This includes large-scale flood risk reduction investments. No water management infrastructure such as dams or water diversion channels will be supported.</p>	<p>During the assessment process conducted under action 1.2.a. above and during implementation</p>	<p>Responsibility: MoFP</p> <p>Accountability: PMU</p>
1.6	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	<p>Throughout project implementation.</p>	<p>Responsibility: MoFP</p> <p>Accountability: PMU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.7	<p>CONTINGENT EMERGENCY RESPONSE FINANCING</p> <p>a) Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements for the implementation of Component 5, in accordance with the ESSs.</p> <p>b) Adopt any environmental and social (E&S) instruments which may be required for activities under Component 5 of the Project, in accordance with the CERC Manual 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.</p>	<p>a) The adoption of the CERC manual and, if applicable, other instruments, in form and substance acceptable to the Association is a withdrawal condition under the legal agreement for the Project.</p> <p>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.</p>	<p>Responsibility: MoFP</p> <p>Accountability: PMU</p>
ESS 2: LABOR AND WORKING CONDITIONS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	<p>LABOR MANAGEMENT PROCEDURES:</p> <p>Update and implement the Labor Management Procedures (LMP) developed as part of the ESMF for the Project, and the SEP, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), heightened risks of forced labor and child labor, due to the deployment of community workers, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p> <p>Consistent with ESS2 and to the satisfaction of the Association, update and implement Labor Management Procedures (LMP) as part of the updated ESMF, applicable to all Project workers and especially for community workers.</p> <p>All the implementing entities must clearly define and communicate the arrangements for engaging workers from the community in the project, ensure transparency, implement safeguards against child and forced labor, prioritize occupational health and safety, and monitor and evaluate the implementation of voluntary community engagement arrangements.</p>	<p>Updated LMP to be adopted in the timeframe specified in 1.2 for the ESMF.</p> <p>LMP shall be maintained throughout Project implementation</p>	<p>Responsibility: MoFP</p> <p>Accountability: PMU</p>
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS:</p> <p>Update and maintain a GRM for direct and contracted project workers as part of the LMP and consistent with ESS2; community workers' grievances are addressed by the Project GRM as outlined under ESS10.</p>	<p>GRM shall be operational prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.</p>	<p>Responsibility: MoFP</p> <p>Accountability: PMU</p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Ensure that contractors hired by implementing parts will adopt and implement a Waste Management Plan (WMP) according to the ESMF to be updated, to manage hazardous and non-hazardous wastes, consistent with ESS3.</p>	<p>Adopt the WMP measures in the timeframe specified in 1.2 for the ESMF, and thereafter implement the WMP throughout Project implementation].</p>	<p>Responsibility: MoFP</p> <p>Accountability: PMU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</p> <p>As part of the updated ESMF, adopt and implement measures and procedures for assessing and managing Project-related pollution and resource efficiency consistent with ESS3. This shall include procedures to avoid impacts on communally shared resources and/or adverse environmental impacts included in ESS3.</p> <p>Require contractors or Implementing Partners to prepare, adopt, maintain, and implement respective measures as part of a C-ESMP, including measures to minimize and/or avoid pollution.</p>	<p>Updated and adopted in the timeframe specified in 1.2 for the ESMF. Maintained throughout Project implementation.</p> <p>C-ESMPs to be adopted prior to commencement of works.</p>	<p>Responsibility: MoFP</p> <p>Accountability: PMU</p>
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY:</p> <p>Incorporate measures to manage traffic and road safety risks as part of the updated ESMF, implement measures and actions to assess and manage traffic and road safety risks.</p>	<p>Updated and adopted in the timeframe specified in 1.2 for the ESMF. Maintained throughout Project implementation</p>	<p>Responsibility: MoFP</p> <p>Accountability: PMU</p>
4.2	<p>COMMUNITY HEALTH AND SAFETY:</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities including, inter alia, behavior of Project workers, risks of labor influx, response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the updated ESMF.</p> <p>Subprojects to prepare, adopt, maintain, and implement a Health and Safety Plan including community health and safety risk management, and where applicable Emergency Response Plans as part of the C-ESMP.</p>	<p>Updated and adopted in the timeframe specified in 1.2 for the ESMF. Maintained throughout Project implementation.</p>	<p>Responsibility: MoFP</p> <p>Accountability: PMU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.3	<p>GBV AND SEA RISKS:</p> <p>Undertake update of the gap assessment of GBV/SEA/SH Protection risks identified under ECRP-II and identify mitigation measures and actions and update and implement a GBV/SEA/SH Protection Action Plan as part of the ESMF to assess and manage the risks of SEA and SH.</p>	Updated and adopted in the timeframe specified in 1.2 for the ESMF. Maintained throughout Project implementation.	<p>Responsibility: MoFP</p> <p>Accountability: PMU</p>
4.4	<p>SECURITY MANAGEMENT:</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; Update, adopt, and implement the security risk assessment and the Security Management Plan (SMP) prepared under ECRP-II consistent with the requirements of ESS4, guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel, in a manner acceptable to the Association.</p>	SMP shall be updated and adopted prior to AF disbursement and thereafter implemented throughout Project implementation.	<p>Responsibility: MoFP</p> <p>Accountability: PMU</p>
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT POLICY FRAMEWORK</p> <p>Update, adopt, and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5. The updated RPF will also provide a complete Voluntary Land Donation (VLD) protocol in accordance with ESS5.</p>	Updated RPF shall be adopted prior to AF disbursement and thereafter implemented throughout Project implementation.	
5.2	<p>RESETTLEMENT PLANS:</p> <p>Prepare, adopt and implement any RAPs required under ESS5 and the updated ESMF before acquisition of land and commencement of subproject works, in a manner acceptable to the Association.</p>	RAPs to be adopted and implemented prior to commencement of works	<p>Responsibility: MoFP</p> <p>Accountability: PMU</p>
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

6.1	<p>BIODIVERSITY RISKS AND IMPACTS:</p> <p>As part of the updated ESMF, implement screening procedures for biodiversity risks and impacts likely to occur during implementation of the project activities to ensure proposed activities are not located within critical natural habitats. Excluded are activities in sensitive areas like national parks, game reserves, forests, water bodies, recognized Ramsar sites etc...</p> <p>Further, a list of exclusion criteria shall be updated and implemented as part of the updated ESMF, to be used in screening during subproject assessment and excluded from project financing.</p> <p>Further relevant aspects of this standard shall be considered under action 1.2 above and in the updated ESMF and subproject ESMPs or C-ESMPs under the Project.</p>	<p>Updated and adopted in the timeframe specified in 1.2 for the ESMF. Maintained throughout Project implementation.</p>	<p>Responsibility: MoFP</p> <p>Accountability: PMU</p>
<p>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</p>			
7.1	<p>INDIGENOUS PEOPLES PLAN</p> <p>The elements of Indigenous People’s Plan (IPP) will be included in the overall project design and updated ESMF and implement the Project in accordance with ESS7.</p> <p>The Project through its design, updated SEP and updated ESMF shall provide adequate, culturally appropriate forms of meaningful consultations and linguistically relevant content on the Project identification and implementation process and benefit sharing.</p> <p>Necessary FPIC provisions will be included as part of the E&S screening in the ESMF, the consultation processes in the SEP, and in the RPF in regard to land acquisition processes. Benefits will be monitored.</p>	<p>The updated SEP and the updated ESMF shall be approved by the Association and disclosed prior to AF appraisal and disbursement respectively and implemented throughout Project implementation.</p>	<p>Responsibility: MoFP</p> <p>Accountability: PMU</p>
<p>ESS 8: CULTURAL HERITAGE</p>			

8.1	<p>CULTURAL HERITAGE RISKS AND IMPACTS</p> <p>Adopt and implement a Cultural Heritage Management Plan (CHMP) as part of the updated ESMF, consistent with ESS8.</p>	<p>Adopt the CHMP as part of the updated ESMF in the timeframe specified in 1.2 for the ESMF, and thereafter implement the CHMP throughout Project implementation.</p>	<p>Responsibility: MoFP</p> <p>Accountability: PMU</p>
8.2	<p>CHANCE FINDS</p> <p>Update, adopt, and implement a chance finds procedure in the Project ESMF and any other measures needed in accordance with ESS8.</p>	<p>Updated and adopted in the timeframe specified in 1.2 for the ESMF. Maintained throughout Project implementation.</p>	<p>Responsibility: MoFP</p> <p>Accountability: PMU</p>
<p>ESS 9: FINANCIAL INTERMEDIARIES</p>			
<p>This standard is not relevant, as the project has no financial intermediaries.</p>			
<p>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</p>			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION:</p> <p>Update, adopt, disclose and implement a Stakeholder Engagement Plan (SEP) for the Project.</p> <p>Update the SEP through in-depth consultations in the new areas under Component 3.</p>	<p>The updated SEP to be adopted prior to AF appraisal.</p> <p>Updated SEP to be revised with in-depth consultation results prior to the commencement of any activities under component 3 of the project.</p> <p>SEP shall be implemented throughout Project implementation</p>	<p>Responsibility: MoFP</p> <p>Accountability: PMU</p>

<p>10.2</p>	<p>PROJECT GRIEVANCE MECHANISM:</p> <p>Update, 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 ESS10as described in the updated SEP.</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>Update GRM 60 days after project Effectiveness Date.</p> <p>Maintain throughout Project implementation</p>	<p>Responsibility: IOM and other Implementing Agencies</p> <p>Accountability: PMU</p>
<p>CAPACITY SUPPORT (TRAINING)</p>			

<p>CS1</p>	<p>All capacity building activities and trainings shall be listed in the ESMF. Training shall be provided to Project workers, contractors, and implementing partners to ensure that the Project is carried out in accordance with this ESCP. Trainings shall be required in accordance with results of capacity assessment, in:</p> <ul style="list-style-type: none"> • Stakeholder engagement • Subproject Environmental and Social screening • Occupational and Community Health and Safety including road safety • Emergency Preparedness and Response • GBV/SEA/SH Risk Mitigation • Disability inclusion training • GRM • Implementation, monitoring and reporting of ESMPs • LMP • Social Assessment and Management Plan implementation • RAP implementation • Emergency preparedness and response training for communities and the government has been added for Component 3 counties. Further, Component 2 training on DRM for national, state, and county governments as well as communities will be scaled up with the AF 	<p>Throughout Project implementation, as specified in the updated ESMF.</p>	<p>Responsibility: IOM and other Implementing Agencies</p> <p>Accountability: PMU</p>
<p>CS2</p>	<p>Training for Project workers and in particular Community Workers on occupational health and safety including on Emergency Prevention and Preparedness and Response arrangements</p>	<p>Prior to commencement of works.</p>	<p>Responsibility: IOM and other Implementing Agencies</p> <p>Accountability: Government/PMU</p>