

Georgia
Resilient Agriculture, Irrigation, and Land
Project
(P175629)

ENVIRONMENTAL and SOCIAL
COMMITMENT PLAN (ESCP)

(Draft)

January 9, 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Georgia (hereinafter the **Borrower**) will implement the Resilient Agriculture, Irrigation, and Land Project (the **Project**) through the Ministry of Environmental Protection and Agriculture of Georgia (MEPA) and the National Agency of Public Registry (NAPR) under the Ministry of Justice. The International Bank for Reconstruction and Development (hereinafter the Bank) has agreed to provide financing for the Project.
2. MEPA and NAPR shall implement material measures and actions so that the Project is undertaken in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions to be carried out or caused to be carried out by the Borrower, including the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, grievance management and the environmental and social assessments and instruments to be prepared or updated, disclosed, consulted upon, adopted and implemented under the ESCP and the ESSs, all in a manner acceptable to the Bank.
3. The Borrower is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by MEPA and NAPR referenced in 1. above.
4. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Bank by the Borrower as required by the ESCP and the conditions of the legal agreement, and the Bank shall monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
5. As agreed by the Bank and the Borrower this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, Georgia shall agree the changes with the Bank and update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Bank and Georgia. The MEPA and NAPR shall promptly disclose the updated ESCP.
6. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Borrower shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the 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 environmental and social (E&S) instruments required under the ESCP, stakeholder engagement activities, Contractors’ ESHS performance, Project-related incidents/accidents, functioning of the grievance mechanism(s).</p>	<p><i>Quarterly beginning after the Effective Date and throughout Project implementation.</i></p>	MEPA NAPR
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Bank 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, <i>inter alia</i>, large-scale accidental spills of polluting and hazardous materials; road accidents; sexual exploitation and abuse and sexual harassment (SEA/SH); and other incidents/accidents on the Project construction sites or related to Project-financed civil works.</p> <p>Provide sufficient detail regarding 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. Subsequently, as per the Bank’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p><i>Notify the Bank within 48 hours after learning of the incident or accident. Provide subsequent report within a timeframe acceptable to the Bank, at the Bank’s request.</i></p> <p><i>Keep incident/accident notification/reporting system in place throughout the Project implementation.</i></p>	MEPA NAPR
C	<p>CONTRACTORS MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on their ESHS performance in accordance with the environmental and</p>	<p><i>Require contractors to submit monthly reports.</i></p>	MEPA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	social metrics specified in the respective bidding documents and contracts. Thereafter, submit such reports to the Bank when requested.	<i>Submit monthly reports to the Bank upon request.</i>	
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish an organizational structure (Project Implementation Unit) within the MEPA by appointing or hiring qualified staff to support management of E&S risks including at least one Environmental Specialist, one Occupational Health and Safety Specialist, one Social Specialist, and one Gender and Community Liaison Specialist, all with experience and qualifications acceptable to the Bank, to be responsible for ensuring full compliance with the ESSs, ESCP, and relevant instruments.</p>	<p><i>Establish not later than 30 days after the Effective Date.</i></p> <p><i>Thereafter maintain throughout Project implementation.</i></p> <p><i>Include into the Project Operation Manual (POM) detailed job descriptions, mandates, responsibilities, and internal reporting order for E&S staff of MEPA Project Implementation Unit involved in the Project implementation.</i></p>	MEPA
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>Finalize, disclose, consult, adopt and implement, consistent with ESSs and in a manner acceptable to the Bank, the Project Environmental and Social Management Framework (ESMF).</p> <p>Undertake site-specific Environmental and Social Impact Assessments (ESIAs)</p>	<p><i>Finalize, consult with stakeholders, re-disclose, and adopt the ESMF not later than 30 days after the Effective Date.</i></p> <p><i>Comply with the requirements of ESMF throughout Project implementation.</i></p> <p><i>Prior to tendering of works for individual</i></p>	MEPA NAPR

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	and develop Environmental and Social Management Plans (ESMPs) as part of ESIA reports or as self-standing documents for individual investments selected for the Project financing, disclose them in draft, discuss with stakeholders, and finalize thereafter.	<i>investments.</i>	
1.3	MANAGEMENT TOOLS AND INSTRUMENTS Implement site-specific ESMPs in the manner acceptable for the Bank.	<i>Throughout Project implementation.</i>	MEPA
1.4	MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of this ESCP, including E&S instruments and the Labor Management Procedures (LMP) requirements into the environmental, social, health and safety (ESHS) specifications of the procurement documents and contracts with works Contractors and Supervision Engineer Require Contractors to develop Contractor’s ESMPs, including OHS Management, Waste Management, Traffic Management, Community Health and Safety, Landscape Restoration, and other plans and method statements in accordance with ESHS specifications included in their contracts all to the satisfaction of Supervision Engineer (where one is contracted) and the MEPA. Thereafter, ensure that Contractors comply with the ESHS specifications of their respective contracts.	<i>Incorporate E&S and LMP requirements into bidding documents prior to tendering of works.</i> <i>Supervise Contractors to ensure adherence with ESHS specifications and Contractor’s ESMPs throughout the life of respective civil works contracts.</i>	MEPA
1.5	TECHNICAL ASSISTANCE AND MANAGEMENT OF TECHNICAL ADVISORY CONTRACTS Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference (TORs) acceptable to the Bank.	<i>Incorporate relevant E&S aspects into TORs prior to the preparation of procurement documents.</i>	MEPA NAPR

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	Incorporate the applicable aspects of ESSs and the relevant provisions of the specific instruments prepared for the Project: ESMF, Resettlement Policy Framework (RPF), Stakeholder Engagement Plan (SEP), and LMP, into the TORs of technical advisory contracts. Thereafter ensure that any outputs from the technical assistance activities and the approaches and outputs of Consultant(s) are consistent with ESSs and comply with TORs.	<i>Ensure Consultants' approaches and outputs comply with the TORs throughout Project implementation.</i>	
1.6	PERMITS, CONSENTS AND AUTHORIZATIONS Obtain or assist contractors in obtaining, as appropriate, the permits, consents and authorizations that are applicable to the Project from relevant national authorities.	<i>Throughout Project implementation</i>	MEPA
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Implement and periodically update the LMP as required in a manner consistent with ESS2 and national legislation of Georgia. Carry out the Project in accordance with the applicable requirements of ESS2 including, <i>inter alia</i> , implementation of relevant OHS measures (use of personal protective equipment, emergency preparedness and response, etc.), setting out grievance mechanisms (GMs) for Project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with works providers and supervising firms.	<i>Implement the LMP throughout Project implementation.</i>	MEPA NAPR
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain, and operate a GM for Project workers, as described in the LMP and consistent with ESS2. Ensure that Contractors have in place a	<i>Incorporate LMP, including the description of GM for MEPA Project Implementation Unit</i>	MEPA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	functioning GM for contracted workers, consistent with ESS2.	<p><i>employees, in POM; adopt and operationalize the GM not later than 30 days after the Effective Date and maintain it throughout Project Implementation.</i></p> <p><i>For Contractors’ employees – ensure GM is available and functional prior to commencement of works by the respective Contractor.</i></p>	
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Obligate contractors to identify measures for OHS risk management based on a thorough assessment of site-specific hazards and develop, adopt, implement, and update periodically, as required, the Contractors OHS plans consistent with the Project LMP and ESMF in the manner acceptable to the Bank and in compliance with the requirements of ESS2 and national legislation of Georgia.</p> <p>Ensure that contractors and supervision Consultants teams have designated staff responsible for the implementation of OHS measures.</p>	<p><i>Ensure adoption of Contractors OHS plans prior to commencement of works under individual investments and their implementation throughout the life of respective civil works contracts.</i></p>	MEPA
2.4	<p>PROJECT WORKERS TRAINING</p> <p>Undertake training of Project workers designed to heighten awareness of OHS risks and the requirements included at the LMP (including workers’ Code of Conduct).</p> <p>Require Contractors to deliver training of contracted workers to raise awareness about their rights and obligations consistent with Project LMP.</p>	<p><i>Full OHS training and Code of Conduct awareness session within a week after mobilization to the worksites and thereafter at least once a year.</i></p> <p><i>Daily toolbox talks at the beginning of a shift.</i></p>	MEPA

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ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT</p> <p>Adopt and implement waste management actions and measures as required in the ESMF and site-specific E&S instruments to manage hazardous and non-hazardous wastes, consistent with the requirements of ESS3.</p>	<p><i>Include waste management requirements into bidding documents prior to tendering of works under individual investments.</i></p> <p><i>Enforce waste management measures throughout Project implementation.</i></p>	MEPA
	<p>Require Contractors to develop to the satisfaction of Supervision Engineer and the MEPA and adhere to the Waste Management Plans, consistent with the requirements of ESS3.</p>	<p><i>Develop Plans prior to commencement of works under individual investments and implement them throughout the life of respective civil works contracts.</i></p>	MEPA
3.2	<p>EXTRACTION OF NATURAL CONSTRUCTION MATERIALS</p> <p>Require Contractors to purchase natural construction material exclusively from licensed suppliers.</p> <p>Require Contractors to request from their suppliers the representation and warrantee that they are operating in full compliance with the national legislation and the terms of held extraction license. Require Contractors to ensure that operations of their suppliers are not contributing to the risk of significant conversion or significant degradation of natural or critical habitats.</p> <p>Undertake periodic inspection of the E&S performance of suppliers, including the implementation of site reinstatement plans, and apply remedies in case of significant shortfalls.</p>	<p><i>Include requirements on due E&S diligence to be applied by Contractors to their suppliers into bidding documents prior to tendering of works.</i></p> <p><i>Track E&S performance of suppliers, including the implementation of site reinstatement plans, and apply remedies in case of significant infringements.</i></p>	MEPA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<p>Require Contractors to obtain resource use license prior to commencing extraction of natural construction materials and strictly adhere to the terms and conditions of the obtained license, including site restoration and harmonization with landscape.</p> <p>Require Contractors to develop detailed time-bound plans for the reinstatement of material extraction sites in consistency with the ESMF and to the satisfaction of Supervision Engineer (where one is contracted) and the MEPA and consistently implement these plans.</p>	<p><i>Check licenses prior to authorizing material extraction by Contractors.</i></p> <p><i>Include requirement of sustainable extraction of natural construction materials into bidding documents prior to tendering of works under individual investments.</i></p> <p><i>Require implementation of reinstatement plans within the specified timeframe and completion of reinstatement prior to demobilization of Contractors.</i></p>	MEPA
3.3	<p>WATER POLLUTION MANAGEMENT</p> <p>Require Contractors to include measures for managing household wastewater and construction runoff as set forth in the ESMF and site-specific E&S instruments of the MEPA into Contractor’s ESMP and implement these measures to the satisfaction of Supervision Engineer (where contracted by the MEPA) and the MEPA.</p> <p>Require Contractors to develop method statements for works in the watercourse consistent with the requirements of ESMF and site-specific E&S instruments of the MEPA and to the satisfaction of Supervision Engineer (when one is contracted) and the MEPA and include into Contractors’ ESMP; strictly adhere to the approved method statements.</p>	<p><i>Include requirement of water pollution management into bidding documents prior to tendering of works under individual investments.</i></p> <p><i>Supervise Contractors to ensure adherence to the water pollution management measures throughout the life of respective civil works contracts.</i></p>	MEPA
3.4	<p>EFFICIENT USE OF WATER RESOURCES</p> <p>Ensure that designs prepared for the rehabilitation of the selected irrigation schemes respond to the objective of maximizing efficiency of water use and</p>	<p><i>Include the requirement for maximizing water and energy savings into the TORs of</i></p>	MEPA

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	<p>energy saving, and that designed capacity and operational arrangements for the schemes enable meeting MEPA’s requirement to retain at least 10% minimal ecologic flow in the rivers at all times of schemes’ operation.</p> <p>Promote the use of water saving irrigation technologies among water users served by the schemes selected for the Project support.</p>	<p><i>design Consultants prior to the commencement of consultant selection.</i></p>	
3.5	<p>PEST AND PESTICIDE MANGEMENT</p> <p>Organize and undertake information campaign on the safe and optimal use of pesticides aimed at the users of irrigation and drainage services provided by the schemes selected for the rehabilitation under the Project in order to minimize risk of soil and water pollution resulting from poorly planned and managed application of agrochemicals.</p>	<p><i>Start preparation for the information campaign upon final approval of irrigation and drainage schemes for the Project intervention. Launch campaign once prepared and lead it throughout the Project implementation.</i></p>	MEPA
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Require contractors to adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMF, consistent with the requirements of ESS4.</p>	<p><i>Include traffic management and road safety requirements into bidding documents prior to tendering of works under individual investments.</i></p> <p><i>Enforce traffic management and road safety measures throughout the Project implementation.</i></p>	MEPA
	<p>Require Contractors to develop to the satisfaction of Supervision Engineer (where one is contracted) and the MEPA and adhere to the Traffic Management Plans, consistent with the requirements of ESS4.</p>	<p><i>Obligate Contractors to develop the Plans prior to commencement of works under individual investments</i></p>	MEPA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
		<i>Obligate Contractors to implement the Plans throughout the life of their contracts</i>	
4.2	<p>DAM SAFETY</p> <p>Complete safety assessment of dams upstream of the irrigation schemes shortlisted for the Project investments; if lacking, purchase and install at least minimum necessary dam monitoring equipment and develop and operationalize emergency preparedness plans satisfactory to the Bank for the selected schemes.</p> <p>Assess needs for and implement training and capacity-building of the team involved in dam surveillance, operation and maintenance.</p> <p>Maintain adequate dam safety management capacity and resources, including for operation and maintenance.</p> <p>Exclude irrigation schemes with significant dam safety issues from the Project support.</p>	<p><i>Complete safety assessment of dams not later than 30 days after the Effective Date.</i></p> <p><i>Undertake other activities not later than two years after the Effective Date.</i></p> <p><i>Maintain dam safety management capacity and resources throughout the project implementation.</i></p> <p><i>Screen irrigation schemes with dam safety issues and drop such schemes from the Project implementation plan prior to commencement of design.</i></p>	MEPA
4.3	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Ensure that Contractors develop and implement Community Health and Safety Plans to manage specific risks and impacts on communities arising from Project activities, including those related to Project workers and possible labor influx, consistent with the requirements of ESS4.</p>	<p><i>Obligate Contractors to develop Plans prior to commencement works under individual investments.</i></p> <p><i>Obligate Contractors to implement the Plans throughout the life of their contracts.</i></p>	MEPA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	Continuously monitor and assess risks and impacts on communities arising from Project activities, including, <i>inter alia</i> , behavior of Project workers, risks of labor influx, response to emergency situations, and require Contractors to update Community Health and Safety Plans for incorporating revised/additional mitigation measures as needed, in consistency with the requirements of ESS4.	<i>Throughout Project implementation.</i>	MEPA
	Ensure the Contractors raise awareness of employees on risks related to and measures for mitigation of impacts on local communities.	<i>Throughout Project implementation.</i>	MEPA
4.4	<p>GBV AND SEA RISKS</p> <p>Adopt and implement actions and measures to prevent and mitigate risks of SEA/SH as required and the Project LMP. This includes but is not limited to requiring Contractors to develop and adhere to the Code of Conduct for all employees and the gender-based violence (GVB)-sensitized GM, and to conduct awareness-raising of all employees and community members on GBV risks and mitigation measures.</p>	<p><i>Include SEA/SH risk prevention and mitigation requirements into bidding documents prior to tendering of works.</i></p> <p><i>Monitor Contractors' adherence to Code of Conduct and operation of GM, and delivery of training throughout Project implementation.</i></p>	MEPA
4.5	<p>SECURITY PERSONNEL</p> <p>Assess and implement measures to manage risks of engaging security personnel to safeguard Project workers, sites, assets, and activities as set out in POM and guided by the principles of proportionality and by applicable national legislation, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.</p>	<p><i>Include procedures for the assessment of security risks and management performance of security personnel onto POM</i></p> <p><i>Screen security personnel prior to their engagement</i></p> <p><i>Monitor performance of security personnel throughout Project life</i></p>	MEPA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	Ensure that all security personnel contracted under the Project are screened on history of prior abuse and adequately trained on appropriate use of force to prevent any risks to workers or communities, consistent with the requirements of ESS4.		
4.6	TRAINING FOR THE COMMUNITY Hold awareness-raising sessions in each Project-affected community on the risks related to community health and safety, and inform them of the rights and obligations of Contractors as well as the avenue for grievance and redress.	<i>Prior to commencement of work under individual investments and periodically throughout their implementation</i>	MEPA
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT PLANS Develop, disclose, discuss with stakeholders, finalize, redisclose, adopt, and implement Resettlement Action Plans (RAPs) in accordance with the RPF and relevant provision of the ESS 5. Ensure that RAPs are approved by the Bank and fully implemented before carrying out the associated activities, in a manner acceptable to the Bank.	<i>Submit draft RAPs for the Bank’s prior review and approval, consult, finalize, and implement them prior to commencing works under individual Project investments requiring involuntary resettlement</i>	MEPA
5.2	RESETTLEMENT MONITORING Engage independent consultant to assess adequacy of RAP implementation and restoration of livelihoods. Implement remedial actions, if recommended by this assessment, and monitor their application.	<i>Conduct assessment of the implementation of individual RAPs once completed. Conduct monitoring of remedial actions (if prescribed) throughout the Project life to ensure their due completion.</i>	MEPA
5.3	GRIEVANCE MECHANISM	<i>Throughout Project implementation.</i>	MEPA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	Ensure that any grievances related to land acquisition, land use restrictions, impacts on private assets and livelihoods, or resettlement are registered and processed via the Project GM in accordance with the requirements of ESS5 and ESS10 and as described in RAPs and SEP.		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY MANAGEMENT</p> <p>Include biodiversity management measures into site-specific E&S instruments as required in the ESMF, consistent with the requirements of ESS6, and obligate Contractors to implement them.</p> <p>Ensure that due permissions are obtained for special forest use and special purpose tree cutting in the State Forest as specified in the national legislation; and, thereafter, that tree-cutting and respective compensation (including payment of fees and planting) strictly adhere to the established rules and approved plans.</p> <p>Requite Contractors to include biodiversity management and compensatory measures into Contractors ESMPs to the satisfaction of Supervision Engineer (where one is contracted) and the MEPA and implement them.</p>	<p><i>Include biodiversity management requirements into bidding documents prior to tendering of works.</i></p> <p><i>Ensure obtaining of special forest use permissions from the relevant State authority prior to commencement of works in the State Forest.</i></p> <p><i>Ensure adherence to the terms of special forest use permissions and compensation rules throughout works in the State Forest.</i></p> <p><i>Enforce biodiversity management measures throughout Project implementation.</i></p>	MEPA
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
This standard is not relevant to the Project.			
ESS 8: CULTURAL HERITAGE			
8.1	<p>CHANCE FINDS</p> <p>Implement the chance finds procedure described in the ESMF, consistent with the requirements of ESS8.</p>	<i>Throughout Project implementation</i>	MEPA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	Require Contractors to include chance finds procedure as described in the ESMF into Contractors ESMPs to the satisfaction of Supervision Engineer (where one is contracted) and the MEPA and adhere to these procedures in consistency with the requirements of ESS8.	<i>Throughout Project implementation</i>	MEPA
ESS 9: FINANCIAL INTERMEDIARIES			
This standard is not relevant to the Project.			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Adopt, update as needed, and implement the SEP, 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>	<i>Implement SEP throughout Project Implementation.</i>	MEPA NAPR
10.2	<p>PROJECT GRIEVANCE MECHANISM Adopt, publicize, operate, and maintain an accessible GM throughout Project implementation, 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 GM shall also receive, register, and address concerns and grievances related to SEA/SH in a safe and confidential manner, including through the referral of survivors to GBV service providers.</p>	<i>Adopt GM and ensure that it is operational not later than 30 days after the Effective Date and maintain throughout Project Implementation.</i>	MEPA NAPR

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CAPACITY SUPPORT (TRAINING)			
CS1	As part of Project launch activities, conduct ESF training for staff of the MEPA and PIEs.	<i>No later than 30 days after the Effective Date</i>	MEPA and NAPR with support from the Bank
CS2	Conduct training for Project workers on ESHS requirements applicable to the works on irrigation and drainage schemes; main E&S risks and impacts associated with contract implementaiton and the mitigation measures prescribed in the ESMF; OHS rules including emergency prevention, preparedness, and response arrangements; and community health and safety including SEA/SH.	<i>Prior to the commencement of works</i>	MEPA