

# **FEDERAL DEMOCRATIC REPUBLIC OF ETHIOPIA**

## **Ministry of Health**

### **Ethiopia Program for Results for Strengthening Primary Health Care Services (P175167)**

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

**March, 2022**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Democratic Republic of Ethiopia (Recipient) will implement the **Investment Project Financing Component (the Project) of the Ethiopia PforR for Strengthening Primary Health Care Services Project**, with the involvement of the implementing agencies Ministry of Health (MoH), the Immigration Nationality and Vital Events Agency (INVEA), and implementing partners. The International Development Association (the Association) has agreed to provide financing for the Project.
2. The Recipient shall implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (ESSs). This Environmental and Social Commitment Plan (ESCP) sets out material measures and actions, specific documents or plans, institutional arrangements, and capacity requirements, as well as the timing for each of these.
3. The Recipient shall also comply with the provisions of any other E&S documents required under the Environmental and Social Framework (ESF) and referred to in this ESCP, such as the Stakeholder Engagement Plan (SEP), and the timelines specified in those E&S documents.
4. The Recipient is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the ministries, agencies or units, entities, or implementing partners referenced in paragraph 1 above, or the regional offices of any of these.
5. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Association by the Recipient as required by the ESCP and the conditions of the legal agreement, and the Association shall monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and the Recipient, 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, the Recipient shall agree to the changes with the Association and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through an exchange of letters signed between the Association and the Recipient. The Recipient shall promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental, social, health, and safety impacts, hazardous waste impacts, gender-based violence, among other Project-related risks.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></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, the status of preparation and implementation of E&amp;S documents required under the ESCP, Stakeholder Engagement activities, and functioning of the Grievance Redress Mechanisms.</p> <p>Require all implementing partners to regularly report on Project implementation to the Recipient and the Association on the same terms and frequencies.</p>	<p><i>Every three, six, and twelve months, with the first report due three months after the Effective Date.</i></p> <p><i>As part of contracts with implementing partners.</i></p>	Ministry of Health (MoH) in collaboration with Immigration Nationality and Vital Events Agency (INVEA) and implementing partners
B	<p><b>INCIDENTS AND ACCIDENTS</b></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, any accident that results in death, serious or multiple injuries, cases of sexual exploitation and abuse, or sexual harassment (SEA/SH). 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.</p> <p>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>Require all implementing partners to notify and report on incidents and accidents to the Recipient and the Association on the same terms and frequencies.</p>	<p><i>Notification shall be given to the Bank within 48 hours of awareness on the incident/accident.</i></p> <p><i>A report shall be provided with the timeframe specified by the Association. As part of contracts with implementing partners.</i></p>	Ministry of Health (MoH), INVEA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>C</b>	<p><b>CONTRACTORS AND IMPLEMENTING PARTNERS</b></p> <p>All Contractors, sub-contractors, and implementing partners shall provide monthly reports on C-ESMP implementation, Labor and Occupational Health and Safety, and other site-specific management plan implementation to MOH. Such reports shall be submitted to the Association by MoH upon request.</p>	<p><i>Monthly reports by Contractors or sub-contractors, to MoH</i></p> <p><i>Every three and six months, submit environmental and social performance reports to the Association.</i></p>	Contractors or sub-contractors Implementing Partners
<b>D</b>	<p><b>THIRD PARTY MONITORING:</b></p> <p>For the IPF Component, the Ministry of Finance or Ministry of Health shall hire a Third-Party Monitor to assess the status and performance of a project, its compliance status, or emerging issues, including the work of implementing partners.</p> <p>The Template TOR for third-party monitoring shall be included in the ESMF and will be reviewed by the Bank.</p>	<p><i>The TMP will be hired before disbursement for Component 1.</i></p> <p><i>Quarterly and Annual TPM reports will be sent to the Association.</i></p> <p><i>Throughout the project implementation</i></p>	MoF(MoH) and Third Party Monitoring Entity
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.1 <b>ORGANIZATIONAL STRUCTURE</b></p> <ul style="list-style-type: none"> <li>MoH shall establish and maintain an organizational structure with qualified staff and resources to support management of environmental, social, health and safety (ESHS) risks of the Project, including one environmental specialist, one social specialist, and one gender specialist with strong Gender Based Violence (GBV )experience in the Project Coordination Unit to manage E&amp;S related issues, with qualifications and experience acceptable to the Association .</li> <li>MOH will contract out the service delivery in the conflict areas which are not accessible to MOH to international humanitarian agencies/implementing partners. MOH shall evaluate the E&amp;S management capacity of any potential implementing partner (according to the ESMF) and require and ensure that implementing partners(1) similarly assign three E &amp; S specialists(namely one environment, one social and one gender specialists) to support E &amp; S implementation of the Project and undergo training as needed; and (2) commit to implement their activities in accordance with this ESCP and all E&amp;S instruments and to be accountable to MOH in this respect.</li> <li>INVEA shall assign one E&amp;S focal person to maintain coordination and support E&amp;S implementation of the project.</li> </ul>	<ul style="list-style-type: none"> <li><i>One environment, one social and one Gender Specialists based in MoH shall be recruited/assigned before disbursement for Component 1 and 2.</i></li> <li><i>E &amp; S specialists shall be in place at implementing partner level before disbursement for Component 1.</i></li> <li><i>E &amp; S focal person assigned at INVEA before disbursement for Component 2.</i></li> </ul>	<p>MoH , INVEA, Implementing Partners</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.2 <b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b></p> <ul style="list-style-type: none"> <li>• Prepare, disclose, and implement an Environmental and Social Management Framework (ESMF) consistent with the ESSs and satisfactory to the Association. The ESMF shall include a template for Environmental and Social Screening checklist and eligibility Criteria for subprojects. The ESMF shall have a detailed Infection Control and Waste Management Plan (ICWMP) and OHS plan. Assess the environmental and social risks and impacts of proposed Project activities in accordance with the ESSs, including to ensure that individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable.</li> <li>• To address any potential social risks and considerations on vulnerable and historically underserved communities, conduct a social assessment.</li> <li>• TECHNICAL ASSISTANCE: 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 acceptable to the Association, that incorporate the relevant requirements of the ESSs.</li> <li>• If a CERC component is included in a project, all activities financed through the CERC are subject to World Bank safeguards policies.</li> </ul>	<ul style="list-style-type: none"> <li>• <i>ESMF will be prepared before disbursement for Component 1 and 2 and call for bids. Activities that are anticipated to have adverse environmental and social impacts will not be financed until the instruments are in place.</i></li> <li>• <i>SA will be prepared before disbursement for Component 1 and 2, recommendations of the SA will be implemented throughout Project implementation period</i></li> <li>• <i>Before the commencement of the sub project implementation</i></li> </ul>	<p>MoH in collaboration with INVEA and the Implementing Partners</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.3 <b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>a. Prepare, publicly consult, disclose, adopt, and implement Environmental and Social Management instruments i.e., ESIA/ESMP, RP, RAP and/or other instruments, if required for the respective Project activities based on the screening and assessment process, in accordance with the ESSs, the ESMF, RPF, the EHSGs and other relevant Good International Industry Practice (GIIP) in a manner acceptable to the Association.</p> <p>b. Following the screening output, the MoH shall prepare and implement an Environmental and Social Impact Assessment/ Environmental and Social Management Plan (ESIA/ESMP), Resettlement Plan (RP) and seek clearance from the Federal/Regional offices of Environment Forest and Climate change Commission before the start of civil works for subproject activities.</p>	<p><i>ESIA/ESMP shall be prepared Prior to commencement of civil works and shall be implemented throughout the project implementation period.</i></p> <p><i>Resettlement plans shall be prepared, cleared and implemented prior to the commencement of any civil work under component 1</i></p>	<p>MoH in collaboration with INVEA and the Implementing Partners</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.4 <b>MANAGEMENT OF CONTRACTORS AND IMPLEMENTING PARTNERS</b></p> <p>MoH shall ensure that contractors and implementing partners develop and implement specific environmental and social management plans consistent with this ESCP and this Project's E&amp;S documents based on the particularity of each project site considering existing environmental and social features. Once prepared, the plans shall be reviewed by MOH prior to commencement of works, throughout Project implementation. Without limitation upon any other provision in this ESCP, the Recipient shall ensure that the following tools are developed and implemented by all contractors and implementing partners, as required by the ESMF:</p> <ul style="list-style-type: none"> <li>• C-OHS management plan</li> <li>• C-Site Rehabilitation Plan</li> <li>• C-Grievance Management Procedure</li> <li>• C-Waste Management Plan (WMP)</li> <li>• E&amp;S screening tool for all subprojects by the PIU</li> <li>• C-GBV prevention and response action plan and code of conduct</li> <li>• Traffic Management Plan</li> </ul> <p>MoH shall ensure that the requirement of C-ESMP including security management measures preparation by contractor and implementing partners is added to any bidding documents and contract for designing, building, and/or supervision of project infrastructure.</p>	<p><i>A comprehensive ESMP that contain C-OHS management plan C-Site Rehabilitation Plan, C-Grievance Management Procedure, C-Waste Management Plan (WMP), E&amp;S screening tool for all subprojects , C-GBV prevention and response action plan and code of conduct and Traffic Management Plan shall be prepared and integrated in to bidding process and throughout the contract.</i></p> <p><i>Throughout Project implementation</i></p>	<p>MoH/ Contractors</p>
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Ensure that all Project workers including implementing partners are employed consistent with ESS2. To that end, prepare and implement the Labor Management Procedures (LMP) in accordance with the requirements of national law and ESS2, which clearly spells out for all Project workers the (i) terms and conditions of employment; (ii) measures to ensure non-discrimination and equal opportunity; (iii) provisions to form workers' organizations; (iv) prevention of child and forced labor and operate it; and (v) occupational health and safety procedures for the project.</p>	<i>LMP to be prepared before disbursement for Component 1 and 2 and maintained throughout Project implementation</i>	MoH in collaboration with INVEA and the Implementing Partners
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Adopt, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	<i>GRM to be operationalized prior to engaging Project workers and maintained thereafter throughout Project implementation</i>	MoH in collaboration with INVEA and the Implementing Partners

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>2.3 <b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>MoH shall develop and implement occupational, health and safety (OHS) management plan and measures for the Project (which shall be included in the ESMF) as per applicable national law and ESS2, and World Bank Group's Environmental Health and Safety Guidelines (EHSGs) specified in ESMF and LMP. These measures shall apply to INVEA workers as well.</p> <p>Incorporate the relevant aspects of this ESCP, including, inter alia, any environmental and social management plans or other instruments, ESS2 requirements, and any other required ESHS measures, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter, ensure that the contractors and supervising firms comply with the ESHS specifications of their respective contracts.</p> <p>The relevant OHS provisions in the General EHSGs will be applied to the project</p> <p>Measures will be designed and implemented, in accordance with national law and the EHSGs, to address the following for women and men project workers:</p> <ul style="list-style-type: none"> <li>• Identification of potential hazards particularly those that may be life-threatening.</li> <li>• Provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances.</li> <li>• Training of project workers and maintenance of training records; Documentation and reporting of occupational accidents, diseases and incidents.</li> <li>• Emergency prevention, preparedness, and response arrangements.</li> </ul>	<p><i>OHS plan shall be prepared and integrated in to the ESMF on timeframe specified in 1.2 (before disbursement for Component 1 and 2) and shall be implemented at the subproject level throughout Project implementation timeline</i></p>	<p>MoH, INVEA, Implementing Partners</p>
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.1	<p><b>WASTE MANAGEMENT PLAN:</b></p> <p>MoH shall prepare and integrate Infection Control and Waste Management Plan (ICWMP) in to the ESMF for the Project.</p> <p>Relevant aspects of ESS3 shall be considered, as needed, under action 1.2 above, including, inter alia, measures to carry out the purchase, storage, transportation and handling medical wastes in a safe manner and in accordance with the EHSs, and other relevant GIIP including relevant WHO guidelines; and adequately manage and dispose of health care wastes including, waste entailing risk of contamination and Infectious waste, pharmaceutical waste and other types of hazardous and non-hazardous wastes.</p>	<p><i>prepare and integrate Infection Control and Waste Management Plan (ICWMP) in to the ESMF on timeframe specified in 1.2 (before disbursement for Component 1 and 2) . Thereafter, implement ICWMP throughout the project implementation period.</i></p>	MoH, INVEA, Implementing Partners
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b></p> <p>Resource efficiency and pollution prevention and management measures shall be included in the ESMF to be prepared under action 1.2.above.</p>	<p><i>Adoption of measures on timeframe specified in 1.2. Measures shall thereafter be implemented throughout the project implementation period.</i></p>	MoH, INVEA

**ESS 4: COMMUNITY HEALTH AND SAFETY**

4.1	<p><b>TRAFFIC AND ROAD SAFETY</b></p> <ul style="list-style-type: none"> <li>✓ The potential traffic and road safety risks to Project workers and surrounding communities throughout the project life cycle shall be identified, evaluated, monitored, and mitigated.</li> <li>• The appropriate measures and plans shall be identified, spelled out in [Traffic Management Plan] and implemented to address potential traffic and roads safety risks, including appropriate training to workers and drivers on vehicle safety.</li> </ul> <p>Ensure the regular maintenance of project vehicles. Include into bidding documents for civil works, requirement for bidders to submit their Management Strategies and Implementation Plans (MSIP) for addressing Environmental, Social, Health and Safety (ESHS) risks and the ESHS Code of Conduct and cause Contractor(s) to act by these documents.</p> <ul style="list-style-type: none"> <li>✓ MoH shall cause Contractor(s) to develop adhere to the mitigation measures provided in the ESMF for traffic management.</li> </ul>	<p><i>Inclusion into bidding documents - prior to tendering of works</i>  <i>Enforcement – throughout Project implementation</i></p> <p><i>Develop Traffic management measures as part of the ESMF - on timeframe specified in 1.2 (before disbursement for Component 1 and 2).</i></p> <p><i>Adhere and implement measures of Traffic Management Plan (TMP) throughout Project implementation</i></p>	<p>MoH, INVEA</p>
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4.2	<p><b>COMMUNITY HEALTH AND SAFETY:</b> Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities. Provide measures to minimize the potential for community exposure to communicable diseases; ensure that individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable have access to the development benefits resulting from the Project.</p> <p>The potential risks and impacts of the project to the community and environment shall be identified and appropriate mitigation measures shall be set to include these measures in the ESMF and C-ESMPs to be prepared in accordance with the ESS 4, in a manner acceptable to the Association.</p> <p>a. The potential risks and impacts of the Project to the community and environment shall be identified and appropriate mitigation measures shall be adopted and implemented,</p> <p>b. Community exposure to disease, improper handling and disposal of healthcare wastes puts the health worker, the patient and the community at large at risk through communicable diseases shall be avoided or mitigated taking into consideration higher sensitivity of vulnerable groups.</p> <p>c. MoH shall ensure and verify that Construction Contractor contracts underpin: Code of ethics and respective behavior and sanctions, Labor and working conditions, and security of sites.</p> <p>d. Ensure the Contractor(s) raises awareness of employees on risks related to and measures for mitigation of impacts on local communities</p>	<p><i>Measures to be adopted as part of the ESMF on timeframe specified in 1.2 ((before disbursement for Component 1 and 2) and therefore implemented throughout the project implementation period.</i></p>	<p>MoH, INVEA, Implementing Partners</p>
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4.3	<p><b>GBV AND SEA RISKS:</b> Prepare, adopt, and implement the Gender Based Violence Action Plan (GBV Action Plan) based on GBV risk assessment, to assess and manage the Project-related risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA). The GBV Action Plan will include Codes of Conduct and other requirements applicable to contractors.</p>	<p><i>GBV action plan shall be prepared before disbursement for Component 1 and 2 and in any event prior to bidding of the sub projects.</i></p>	MoH in collaboration with INVEA and Implementing Partners
4.4	<p><b>SECURITY MANAGMENT:</b> 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. A Security Risk Assessment (SRA) and related Security Management Plan (SMP) will to be carried out to minimize the risk of conflict and insecurity situation consistent with the requirements of ESS4, in a manner acceptable to the Association.</p> <p>As part of the Security Management Plan and related implementation, adopt and enforce standards, protocols and codes of conduct for the selection and use of security personnel, and screen such personnel to verify that they have not engaged in past unlawful or abusive behavior, including sexual exploitation and abuse (SEA), sexual harassment (SH) or excessive use of force.</p>	<p><i>SMP shall be prepared no later than three months after Project effectiveness, and in any event before any physical engagement conflict-prone areas, or the deployment of security personnel. Thereafter maintain the SMP throughout Project implementation.</i></p> <p><i>Before deploying security personnel under the Project and thereafter throughout Project implementation</i></p>	MoH in collaboration with INVEA and the Implementing Partners
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<p>Prepare and implement Resettlement Policy Framework. The RPF shall provide spell out the process for preparing, reviewing, approving, and implementing subsequent Resettlement Action Plans (RAPs) where necessary. The RPF also provides guidance on the process of public consultations, establishment of a functional grievance handling mechanism, and disclosure requirements.</p>	<p><i>RPF shall be prepared Prior to disbursement for component 1. Thereafter, implement RPF throughout Project implementation.</i></p>	MoH in collaboration with the Implementing Partners

5.2	<b>RESETTLEMENT PLANS:</b> As required by ESS5 and the RPF, develop and implement Resettlement Action Plans (RAPs) consistent with the requirements of the RPF and ESS5.	<p><i>On-going throughout Project as required by RPF. RAPs shall be approved before subproject bidding and implemented before commencement of the Civil works.</i></p> <p><i>Progress update shall be included in quarterly and annual reports to the World Bank.</i></p>	MoH in collaboration with the Implementing Partners
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p><b>BIODIVERSITY RISKS AND IMPACTS:</b></p> <p>As per the ESMF requirements, conduct a preliminary screening and assess each of the proposed activity/subproject for financing, in terms of its risks and impacts on biodiversity and ensure activities that may have significant adverse impacts on important and/or critical natural habitats will be excluded from the project financing. These requirements must be applied for all Project activities.</p> <p>The required management measure shall be prepared, disclosed, adopted and implemented in ESMPs/ESIAs in accordance with the requirement stated the ESF and ESS 6.</p>	<p><i>Based on the Screening checklist annexed in the ESMF, screening shall be undertaken prior to subproject activities approval</i></p> <p><i>Screening and management measures shall be adopted on timeframe specified in 1.3 and implemented throughout the project implementation.</i></p>	MoH in collaboration with INVEA
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	Social Assessment (SA) proportional to the activities under the project shall be prepared and disclosed. The SA will inform different needs of project beneficiaries including underserved traditional local communities and vulnerable people and how to address their needs and ensure that underserved communities and vulnerable people fully benefit from the project interventions under the IPF	<p><i>Prior to disbursement for component 1 and 2</i></p>	MoH in collaboration with INVEA
<b>ESS 8: CULTURAL HERITAGE</b>			

8.1	<p><b>CHANCE FINDS</b></p> <p>In accordance with ESS8, include chance find procedure in the ESMF. MoH shall ensure the contractor and subcontractor implement the chance finds procedure described in the ESMF and included in all site-specific C-ESMPs involving subprojects with earthmoving activities.</p>	<p><i>Chance find procedure and screening procedure shall be included as part of the ESMF which will be prepared prior to disbursement for Component 1 and 2 and it will be maintained and implemented throughout Project implementation.</i></p>	MoH in collaboration with INVEA
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
9.1	Not Applicable	Not Applicable	
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b></p> <p>MoH shall prepare and implement a Stakeholder Engagement Plan (SEP) for the Project. This SEP shall govern the engagement of project stakeholders during the activities and may be regularly updated (and redisclosed) as needed in accordance with ESS10, to reflect new stakeholders identified and the appropriate means of consulting them. In addition, the SEP will be updated based on the SA findings if required.</p>	<p><i>The Stakeholder Engagement Plan (SEP) shall be prepared and finalized Prior to Appraisal</i></p> <p><i>Thereafter, implement SEP.</i></p> <p><i>SEP implemented and updated throughout project implementation.</i></p>	MoH in collaboration with INVEA
10.2	<p><b>PROJECT GRIEVANCE MECHANISM:</b> MoH shall ensure the establishment of GRM for the Project and maintain and operate a functioning GRM, as described in the SEP.</p>	<p><i>GRM established no later than 90 days after the project Effective Date, maintained throughout the Project implementation</i></p>	MoH
<b>CAPACITY SUPPORT (TRAINING)</b>			

CS1	<p>MoH will organize several capacity building trainings for ES and gender experts at various level on the following topics .The trainings will be delivered both by internal capacity and external bodies i.e EPA and individual and firm level consultants.</p> <ul style="list-style-type: none"> <li>• Specific aspects of environmental and social assessments and risks management</li> <li>• OHS measures including application of PPE</li> <li>• Waste handling, storage, transport and disposal</li> <li>• Stakeholders Engagement Plan</li> <li>• Grievance redress mechanisms</li> <li>• Prevention and response to gender-based violence including sexual exploitation and abuse and sexual harassment</li> <li>• Community health &amp; safety, occupational health &amp; safety and all other instruments necessary for compliance with environmental and social standards.</li> <li>• Cultural adaptation and outreach to address the needs of underserved traditional local communities</li> </ul>	<p><i>ESS-related training will be delivered at the beginning of the first year of effectiveness and annually thereafter at all levels as required, including front-line implementers. Reporting on training will be included in the quarterly and Annual Reports.</i></p>	<p>MoH in collaboration with INVEA and implementing partners</p>
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