THE WORLD BANK - ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)



República de Moçambique

## MINISTÉRIO DA SAÚDE

INVESTING IN INCLUSIVE HUMAN CAPITAL DEVELOPMENT IN NORTHERN MOZAMBIQUE (P175298)

# ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

(DRAFT)

September 2021

#### Republic of Mozambique Investing in Inclusive Human Capital Development in Mozambique Project

#### ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

- The Republic of Mozambique (the Recipient) is planning to implement the Investing in Inclusive Human Capital Development in Mozambique Project (P175298) (the Project) with the leadership of the Ministry of Health (MISAU), with involvement of the Ministry of Education and Human Development (MINEDH) and the Ministry of Gender, Child and Social Action (MGCAS) and implemented by the Provincial State Secretariats and Provincial Executive Councils of Cabo Delgado, Nampula and Niassa Provinces. The International Development Association (the Association) is providing financing for the Project.
- 2. The Recipient shall implement material measures and actions so that the project is implemented in accordance with the with the Environmental and Social Standards (ESSs). This Environmental and Social Commitment Plan (ESCP) sets out material measures and actions, any specific instruments or plans, as well as 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, adopted and implemented under the ESCP and the ESSs, all in a manner acceptable to the Association.
- 3. The Recipient shall also comply with the provisions of any other Environmental and Social (E&S) documents required under the Environmental and Social Framework (ESF) and referred to in this ESCP, such as Stakeholder Engagement Plan (SEP), Resettlement Policy Framework (RPF), Environmental and Social Management Framework (ESMF) which among others includes the Social Assessment (SA), Labour Management Procedures (LMP), Emergency Response Plan (ERP), Pest Management Plan (PMP), Infectious Control and Waste Management Plan (ICWMP), Gender-Based Violence, Sexual Exploitation and Abuse, Sexual Harassment Prevention and Response Action Plan (hereinafter, referred to as SEAH/GBV Action Plan), Chance Finding Procedures (CFP), COVID 19 Protocol, Systematic Capacity Needs Assessment, a stand-alone Conflict and Social Assessment, Security Risk Assessment and Management Plan and any other necessary instruments that may be prepared during Project implementation, and the timelines specified in those E&S instruments.
- 4. The Recipient is responsible for compliance with all requirements of the ESCP, even when the implementation of specific measures and actions are conducted by the Ministries and provincial institutions referenced in paragraph 1 above.
- 5. Implementation of the material measures and actions set out in this ESCP shall be continuously monitored and periodically reported to the Association by the Recipient, as required under 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 between the Association and Recipient, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project implementation changes and unforeseen circumstances or in response to assessment of Project implementation 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 the exchange of letters signed between the Association and the Recipient. The Recipient shall promptly disclose the updated ESCP.

7. Where changes due to 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, health and safety impacts, natural resource degradation, environmental pollution, reduction of vegetation, interruption of free movement and socioeconomic activities, social conflicts due to labor influx/in-migration, community health and safety, occupational health and safety, loss of land and loss of goods and sources of income, gender-based violence (GBV) and in particular sexual exploitation and abuse/sexual harassment (SEA/SH), child labor and forced labor and security risks and impacts.

### Table 1. Material Measures and Actions

Mate	erial Measures and Actions	Timeframe	Responsible institution
MON	ITORING AND REPORT		
A	<b>IMPLEMENTATION AND REGULAR REPORTING</b> The Government of Mozambique, through the PIU, will implement all safeguards requirements and instruments set forth herein and 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 and implementation of activities under the Stakeholder Engagement Plan (SEP) including project associated grievance redress mechanism(s), using monitoring templates specified in the ESMF, RPF and other instruments.	Starting from the Effectiveness Date, quarterly reports throughout Project implementation. Reports to be sent within the first 5 days after the reporting period.	Responsibility: PIUs Environmental & Social Safeguards Team Accountability: PIUs Team Leader Funding: Project Funds
В	INCIDENTS AND ACCIDENTS NOTIFICATION: 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 without limitation any allegation of Gender Based Violence, Sexual Exploitation and Abuse, Sexual Harassment (GBV/SEA/SH), in connection with the Project, occupational accidents or fatalities, or labor unrest. Provide enough 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, prepare and submit to the Association a report on completion of the incident or accident investigation and closure, including a set of proposed measures to prevent its recurrence.	Any incident or accident shall be notified to the Bank Task Team Leader immediately after taking note of the incident or accident. The immediate incident or accident written report shall be submitted to the Bank within 48 hours after learning of the incident or accident. MISAU/MINEDH/MGCAS shall Prepare and submit a full incident/ accident report in form and substance satisfactory to the Bank within the following seven (7)	Responsibility: PIUs Environmental & Social Safeguards Team Accountability: PIUs Team Leader Funding: Project Funds

		business days. Maintain this systematic notification system throughout project implementation.	
C	CONTRACTORS QUARTERLY REPORTS Contractors and sub-contractors are required to provide quarterly monitoring reports on the environmental, social health and safety (ESHS) performance of subprojects to the PIUs. Such quarterly reports would be submitted to the Association by the Recipient. The PIUs are responsible for ensuring that the reports are prepared and submitting them to the Association	From contractors to PIU: Quarterly reporting throughout Project implementation From PIU to the Association: Mandatory Quarterly Reports	Responsibility: PIUs Environmental & Social Safeguards Team and Contractors Accountability: PIUs Team Leader Funding: Project Funds

ESS1:	SS1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE:	E&S Specialists shall be	Responsibility:	
	As part of the overall investing in Inclusive Human Capital Development in Northern	recruited before	MISAU/MINEDH/MGCAS	
	Mozambique project, the Recipient will create and maintain, throughout Project	Commencement of Project		
	implementation, an organizational structure with qualified staff and appropriate resources	Activities and within 30	Accountability: PIU Team	
	to support management of environmental and social risks and impacts including	days after the Project	Leader	
	identification, assessment, monitoring and supervision. The Recipient will establish a Project	Effective Date.		
	Implementation Unit (PIU) for project implementation at central level and Provincial		Funding: Project Funds	
	Operational Units (POUs) in each of the three provinces. Specifically, the PIU and the three	The organizational	runung. rroject runus	
	POUs will recruit dedicated specialists for each unit : one Environmental Specialist and one	structure shall be		
	Social Specialist with Gender, GBV/SEA/SH skills, all recruited on the basis of terms of	maintained throughout		
	reference, qualifications, integrity and experience satisfactory to the Association. Other	Project implementation.		
	specialists will also be hired as and when required by the Association.			
1.2	ENVIRONMENTAL AND SOCIAL ASSESSMENT AND MANAGEMENT TOOLS	ESMF, SEP and RPF	Responsibility: PIUs	
	The Recipient shall undertake the preparation of a series of tools and instruments for	finalized, consulted upon,	Environmental & Social	
	mitigation of Environmental and Social risks and impacts. The following ESF instruments	and disclosed by Appraisal	Safeguards Team and	
	have been prepared in draft format and shall be finalized, updated as needed, disclosed,	and implemented	Contractors	
	consulted upon, adopted and implemented thereafter in a manner acceptable to the	throughout Project	Assounts hility DILLS Toom	
	Association:	implementation.	Accountability: PIUs Team Leader	
	- Environmental and Social Management Framework (ESMF) including: Labor Management		Leader	
	Procedures (LMP) including GRM for Project workers, Emergency Response Plan (ERP),			
	Pest Management Plan (PMP), Infectious Control and Waste Management Plan (ICWMP),		Funding: Project Funds	
	Gender-Based violence, Sexual Exploitation and Abuse, Sexual Harassment Prevention	Conflict and Social		
	Risk Assessment and Action Plan, Chance Finding Procedures (CFP), COVID-19 Protocol,	Assessment and Security		
	Systematic Capacity Needs Assessment, Social Assessment (SA)	Risk Assessment and		
	- Conflict and Social Assessment;	Management Plan		
	- Security Risk Assessment and Management Plan	to be finalized by		
	- Stakeholder Engagement Plan (SEP) including a Grievance Redress Mechanism;	Appraisal.		
	- Resettlement Policy Framework (RPF) setting out procedures to screen sites, determine			
	need for RAPs/Livelihood Restoration Plans and guide their preparation.			
		ESMF updated and		
	The ESMF will be updated in line with the Regional ESIA for projects in the north of	Regional ESIA prepared		
	Mozambique.	within 6 months after the		
		Project Effective Date.		

	Prepare and submit to the Association the ESIAs, ESMPs, required for each subproject in accordance with the ESMF. RAP/RAPs will be prepared if needed in accordance with the RPF.	Site-specific ESIAs/ESMPs and RAPs shall be prepared, disclosed, consulted upon, and adopted before the commencement of civil works activities that require the preparation of these site-specific instruments as relevant. RAPs will be implemented before commencement of civil works.	
1.3	<ul> <li>MANAGEMENT OF CONTRACTORS:</li> <li>The Recipient shall develop and implement procedures for managing contractors and subcontractors as follows:         <ul> <li>Relevant aspects of the ESCP, including the management tools and instruments referred to in Section 1.2 above and any other E&amp;S plans, Environmental Codes of Practices (ECOPs) and Gender Based Violence (GBV) Codes of Conduct, among others shall be incorporated in ESHS specifications of relevant procurement documents and in contracting processes including bidding documents for potential civil works. Contractor's Management Procedures and requirements will include without limitation:</li></ul></li></ul>	Prior to the preparation of procurement documents. Maintain procedures throughout Project implementation Supervise contractors throughout Project implementation	Responsibility: PIUs Environmental & Social Safeguards Team and Contractors Accountability: PIUs Team Leader Funding: Project Funds

	<ul> <li>Ensure contractors provide details on contractor's oversight on environmental, social, health and safety (ESHS) performance</li> <li>Contractor to develop a grievance mechanism to handle concerns of their employees especially laborers</li> <li>Contractor shall prepare and implement a specific Labor Management Plan consistent with the Project's Labor Management Procedure</li> <li>Provisions for remedial actions and sanctions in case of non-compliance</li> <li>Supervision arrangements including reporting and effective noncompliance remedies shall be reflected in contractual requirements and enforced thereafter.</li> <li>Procedures to provide for proper interface between the Project GRM and Contractor GRM are in place.</li> </ul>		
1.4	<ul> <li>PERMITS, CONSENTS AND AUTHORIZATIONS:</li> <li>Obtain or assist in obtaining and verifying that contractor has obtained, as appropriate, the permits, consents and authorizations that are applicable to the Project from relevant national authorities such as: <ul> <li>Environmental licenses</li> <li>Water use and effluent discharging licenses</li> <li>Land use rights (DUATs)</li> <li>Construction licenses</li> <li>Bush clearing licenses</li> <li>Any other licenses as and when required</li> </ul> </li> <li>The Recipient shall comply or cause to comply, as appropriate, with the conditions established in these permits, consents and authorizations throughout Project implementation.</li> </ul>	Prior to initiating activities that require permits, consents and authorizations. Throughout Project implementation.	Responsibility: PIUs Environmental & Social Safeguards Team Accountability: PIUs Team Leader Funding: Project Funds
1.5	THIRD PARTY MONITORING: A TPM agent will be engaged to provide independent review of project implementation and verification of project results, including adherence to all aspects of the Project Operations Manual and the ESCP A third-party monitoring agent will be contracted to provide an independent review of SEA/GBV/SH Service Provider to be hired under the Project.	Monthly reporting throughout Project implementation	Responsibility: PIUs Environmental & Social Safeguards Team Accountability: PIUs Team Leader Funding: Project Funds
1.6	<b>CONTINGENT EMERGENCY RESPONSE</b> In the event of an emergency which leads to activation of the Contingent Emergency Response Component (CERC) of the Project, the necessary instruments and measures will be	Prior to the start of emergency response activities. The	Responsibility: PIUs Environmental & Social Safeguards Team

	developed as required prior to undertaking of the emergency response activities, to ensure compliance with the ESSs and in accordance with the Exclusion List and the Environmental and Social Screening Check List that were prepared and included in the CERC ESMF as part of the Project ESMF.	request to activate this part shall come from the implementer with prior No Objection from the Association.	Accountability: PIUs Team Leader Funding: Project Funds
ESS2:	WORKING AND LABOR CONDITIONS		
2.1	LABOR MANAGEMENT PROCEDURES:         A draft Labor Management Procedures (LMPs) for all Project workers aligned with the applicable Mozambican Labour Legislation and the specifications set forth in ESS2 requirements has been prepared and shall be finalized, consulted upon, adopted, disclosed and implemented thereafter.         The LMP shall address all issues identified in ESS2, including the applicable requirements regarding non-discrimination, equal opportunity, prohibition of child labor and forced labour and include a grievance redress mechanism (GRM) covering all Project workers throughout project implementation. This GRM shall be consistent with ESS2 and shall be equipped to handle allegations of SEA/SH. Information on the GRM to be disseminated to project workers.	LMP finalize as part of the ESMF and disclosed by Appraisal LMP to be implemented throughout Project implementation. GRM under LMP shall be disseminated and operational prior engaging Project workers and maintained throughout Project implementation	Responsibility: PIUs Environmental & Social Safeguards Team Accountability: PIUs Team Leader Funding: Project Funds
2.2	<b>GRIEVANCE REDRESS MECHANISM (GRM) FOR PROJECT WORKERS</b> Establish, maintain, and operate a GRM for Project workers, as described in the LMP and consistent with ESS2.	GRM shall be operational prior engaging Project workers and maintained throughout Project implementation	Responsibility: Environmental & Social Safeguards Team Accountability: PIUs Team Leader
2.3	OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES: Develop and implement OHS measures, in line with Mozambican legislation and ESS2, as part of the LMP (included in the ESMF/ESIA/ESMP) and Emergency Preparedness and Response Plan (ERP).	Preparation of OHS measures as part of relevant E&S instruments in line by Appraisal. Implemented throughout Project implementation	Funding: Project Funds Responsibility: Environmental & Social Safeguards Team Accountability: PIUs Team Leader

	The draft ESMF includes OHS measures, including a COVID-19 specific measures, according with the COVID -19 protocol to ensure that all project activities minimize the spread of infections.		Funding: Project Funds
2.43	PROJECT WORKERS TRAINING:         The Recipient shall develop and implement a training plan for project workers, to raise awareness of environmental and social risks and impacts and mitigation measures. This shall include but not be limited to the following: <ul> <li>GBV/SEA/SH awareness and prevention</li> <li>Covid-19 awareness and prevention</li> <li>Communicable diseases/HIV-AIDS/STI/awareness and prevention</li> <li>Occupational Health and Safety</li> <li>Resource efficiency, pollution prevention and biodiversity management measures included in the ESMPs</li> <li>Emergency Response procedures</li> <li>Security management</li> <li>Workers' grievance redress mechanism as described in the SEP/ ESMF/ESIA/ESMP</li> </ul>	Before commencement of relevant activities and throughout Project implementation.	Responsibility: Environmental & Social Safeguards Team Accountability: PIUs Team Leader Funding: Project Funds
ESS3:	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT		
3.1	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b> The draft ESMF includes an Infectious Control and Waste Management Plan (ICWMP), and a Pest Management Plan (PMP) in compliance with ESS3 requirements. Resource efficiency, pollution prevention and management measures are covered under the draft ESMF and shall be covered under the specific ESMPs to be prepared subsequently, following subprojects' screening results.	ICWMP and PMP finalized as part of the ESMF and before Appraisal Preparation of Waste Management Plan as part of ESMPs in line with timeframes set forth in Section 1.2 above. Maintained throughout Project implementation.	Responsibility: Environmental & Social Safeguards Team Accountability: PIUs Team Leader Funding: Project Funds
	COMMUNITY HEALTH AND SAFETY		
4.1	<b>TRAFFIC AND ROAD SAFETY:</b> Measures and actions to address traffic and road safety risks are included in the draft ESMF and shall be included in the specific ESMP to be prepared subsequently, following subprojects' screening results.	Preparation of traffic and road safety measures as part of relevant ESMPs in line with timeframes set forth in Section 1.2 above. <i>Maintained throughout</i>	Responsibility: Environmental & Social Safeguards Team Accountability: PIUs Team Leader

	Procedures to address traffic and road safety risks that include emergency communication in case of accident and incidents shall be prepared and applied to all services provides involved in project implementation	Project implementation	Funding: Project Funds
4.2	COMMUNITY HEALTH AND SAFETY: The subproject specific ESIA/ESMP will include measures and actions to assess and manage specific risks and impacts to the community arising from Project activities, including inter alia behaviour of Project Workers, any risks of labor influx, response to emergency situations, security risks, the spread of infectious diseases including COVID -19, and GBV/SEA/SH and include these measures in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Association. The Project shall apply the requirements of the Environmental Health and Safety Guidelines (EHSGs) as well as ESS4 provisions when preparing subproject level E&S instruments. The draft ESMF prepared for the project includes OHS measures, including a COVID -19 protocol to ensure that all project activities minimize the spread of infections. Relevant measures shall be applied to all service providers involved in project implementation	Preparation of community health and safety measures as part of relevant ESIAs/ESMPs in before Appraisal. Maintained throughout Project implementation	Responsibility: Environmental & Social Safeguards Team Accountability: PIUs Team Leader Funding: Project Funds
4.3	<ul> <li>GBV/SEA/SH RISKS ASSESSMENT AND ACTION PLAN:</li> <li>A Gender-Based Violence/ Sexual Exploitation and Abuse/ Sexual Harassment (GBV/SEA/SH)</li> <li>Risk Assessment and Action Plan is part of draft ESMF. It includes provisions for additional assessment and mitigation measures at the subproject level.</li> <li>It will be applied across all relevant activities in accordance with ESS4.</li> <li>A Code of Conduct on GBV/SEA/SH will be prepared and applied to all workers involved in project implementation.</li> <li>The Recipient shall ensure that the labor and community related clauses of the ESMP and SEA/SH Action Plan are included in the bidding documents, Requests for Proposals (RFPs) and contracts for contractors, sub-contractors and service providers, who are required to prepare Contractor's ESMPs (C-ESMP), shall include a Community Health and Safety Plan (CHSP).</li> </ul>	GBV/SEA/SH Risk Assessment and Action Plan finalized as part of the ESMF and disclosed by Appraisal Codes of Conduct on GBV/SEAH and GBV Action Plan to be in place prior to project activities. Maintained throughout Project implementation.	Responsibility: Environmental & Social Safeguards Team Accountability: PIUs Team Leader Funding: Project Funds
4.4	<b>EMERGENCY RESPONSE MEASURES (ERP):</b> The Emergency Response Plan (ERP) included in the draft ESMF provides guidelines for preparation of ERPs to be included in site specific ESIA/ESMP instruments	Prior to project activities. ERP finalized as part of the ESMF and	Responsibility: Environmental & Social Safeguards Team

	Measures included in the ERP shall be disseminated as part of the SEP, in accordance with	ESIAs/ESMPs per Section	
	ESS4. The measures shall be updated and detailed in light of site- specific risks and impacts in	1.2 above and maintained	Accountability: PIUs Team
	subsequent ESMPs.	throughout Project	Leader
		implementation.	
			Funding: Project Funds
4.5	TRAINING FOR THE COMMUNITY:	Prior to project activities,	Responsibility:
	The Project shall conduct trainings for the community designed to raise awareness of	with regular refresher	Environmental & Social
	environmental and social risks and impacts and mitigation measures. This shall include but not	training. Maintained	Safeguards Team
	be limited to the following:	throughout Project	Accountability: PIUs Team
	- Covid-19 awareness and prevention	implementation.	Leader
	- GBV/SEA/SH awareness and prevention		Leader
	- Community grievance redress mechanism as described in the SEP/ ESMF/ESIA/ESMP		
	- Road Safety Awareness		Funding: Project Funds
	- Labor Influx management measures		i analigi i i oject i anas
	- Emergency Response procedures		
	- Communicable diseases/HIV-AIDS/STI/awareness and prevention		
4.6	SECURITY MANAGEMENT PLAN (SMP):		Responsibility:
		Security Risk Assessment	Environmental & Social
	A draft Security Risk Assessment and Action Plan has been prepared and shall be finalized,	and Action Plan finalized	Safeguards Team
	consulted upon and adopt and shall be updated periodically and implemented throughout the	by appraisal and to be	
	project. The SMP/SP will be updated in line with the Regional Security Risk Assessment to be	Implemented throughout	Accountability: PIUs Team
	prepared for all projects in Mozambique's north.	the project.	Leader
	prepared for all projects in wozanisique s north.	the project.	
5665			Funding: Project Funds
	LAND ACQUISITION, RESTRICTION ON LAND USE AND INVOLUNTARY RESETTLEMENT		<b>a</b> 11.111
5.1	LAND ACQUISITION AND RESETTLEMENT:	RPF will be finalized,	Responsibility:
	A draft Resettlement Policy Framework (RPF) was developed and shall be finalized, consulted	consulted upon, and	Environmental & Social
	upon and disclosed to provide guidance on any land acquisition requirements under the	disclosed by Appraisal].	Safeguards Team
	project.		Accountability: PIUs Team
		RAPs and LRP to be	Leader
	Where required by sub-projects, a site specific Resettlement Action Plan/Plans	prepared, disclosed,	
	(RAPs)/Livelihoods Restoration Plan (LRP) will be prepared and implemented before carrying	consulted upon, and	
	out the any civil works activities, in a manner acceptable to the Association, whenever	adopted prior to carrying	Funding: Project Funds
	applicable.	out civil works that involve	
		land acquisition and	
		involuntary resettlement	
		and implemented	

		thereafter throughout the	
		Project implementation.	
ESS6:	BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESO	URCES	
6.1	BIODIVERSITY RISKS AND IMPACTS: The ESMF includes criteria and procedures to ensure that sub-project investments are designed and implemented in ways that avoid damage to protected areas or critical habitats.	ESMF shall be finalized, consulted upon, and disclosed by Appraisal	Responsibility: Environmental & Social Safeguards Team
	The ESIAS/ESMPs shall specifically include criteria and procedures to ensure that sub-project investments are designed and implemented in ways that avoid damage to protected areas or critical habitats, in accordance with the requirements of ESS6 and in a manner acceptable to	Preparation of biodiversity management measures as part of relevant	Accountability: PIUs Team Leader
	the Association. Biodiversity management measures shall be prepared as part of the site specific ESMPs, and	ESIAs/ESMPs in line with timeframes set forth in Section 1.2 above.	Funding: Project Funds
	their implementation documented in quarterly reports from Contractors that the <i>Recipient</i> shall compile and make available to the <i>Association</i> upon request.	Measures to be implemented throughout	
		the Project	
FCC7.		implementation.	
	INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL		
	standard is not relevant currently as there are no distinct social and cultural groups have beer ext in the project area.	i identified in accordance wit	in ESS7 and in the national
ESS 8:	CULTURAL HERITAGE		
8.1	CHANCE FINDS: The draft ESMF includes guidelines for Chance Find Procedures according to Mozambican law, which will be finalized and followed. If potential adverse impacts on cultural heritage near or on any project sites are identified, cultural heritage plan(s) will be developed in accordance with this Standard and national law, including chance find procedures, in line with the ESMF's guidelines.	Chance Find Procedures finalized as part of the ESMF and disclosed by Appraisal Maintained throughout Project implementation.	Responsibility: Environmental & Social Safeguards Team Accountability: PIUs Team Leader
			Funding: Project Funds
ESS9:	FINANCIAL INTERMEDIARIES		
There	e are no actions under the Project related to Financial Intermediaries, therefore there are no mit	igation measures to be under	taken under ESS9.
	0: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE		
10.1	STAKEHOLDER ENGAGEMENT PLAN (SEP) PREPARATION AND IMPLEMENTATION	SEP disclosed by Appraisal.	Responsibility:
	The SEP guides stakeholder engagement during preparation of the environment and social	To be updated and	Environmental & Social
	risk management instruments and other studies. It will be prepared and consulted upon by	implemented and	Safeguards Team

	appraisal and shall be regularly updated to reflect new stakeholders identified and appropriate ways to consult them.	throughout the project cycle	Accountability: PIUs Team Leader
10.2	<b>GRIEVANCE REDRESS MECHANISM:</b> The Grievance Redress Mechanism shall provide project-affected parties with accessible and	GRM will be operational before commencement of	Funding: Project Funds Responsibility: Environmental & Social
	inclusive means to raise issues and grievances including on GBV/SEAH-related complaints, in accordance with ESS10, and in a manner acceptable to the Association.	<i>Project Activities and within 30 days after the Project Effective Date.</i>	Safeguards Team Accountability: PIUs Team Leader
		GRM to be maintained throughout Project implementation.	Funding: Project Funds
10.3	<ul> <li>Capacity Building</li> <li>All capacity building activities and trainings shall be further detailed in the ESMF, trainings may be required in: <ol> <li>Training on the ESF (Environmental and Social Standards)</li> <li>Stakeholder engagement</li> <li>Environmental and Social screening</li> <li>Occupational and Community Health and Safety</li> <li>Emergency preparedness and response</li> <li>Integrated Pest Management – acquisition, use, conservation and final disposal of pesticides</li> <li>Infectious Control and Waste Management</li> <li>GBV/SEA/SH Risk Mitigation</li> <li>GRM, including proper handling of GBV/SEA/SH cases</li> <li>Labour management procedures</li> <li>COVID-19 mitigation</li> <li>RAP preparation and implementation</li> <li>Response arrangements to emergency situations</li> <li>Conflict Management</li> <li>Monitoring and reporting</li> <li>Security Management</li> </ol> </li> </ul>	Before commencement of relevant activities and throughout Project implementation. 14, During the first year of project implementation	Responsibility: Environmental & Social Safeguards Team Accountability: PIUs Team Leader Funding: Project Funds