



The Republic of Uganda

**MINISTRY of WORKS and TRANSPORT
[MoWT]**

**Northeastern Road Corridor Asset
Management Project II (P514937)**

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

Appraisal Version

April 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Uganda represented by the Ministry of Finance Planning and Economic Development (the Recipient) will cause the Ministry of Works and Transport to implement the Uganda Northeastern Road -Corridor Asset Management II Project (the Project), as set out in the Financing Agreement (the Agreement). The International Development Association (the Association) has agreed to provide financing as set out in Agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the World Bank 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 Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the 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, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreement, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Recipient shall agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Representatives specified in the Agreement. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT¹			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>1. The Recipient shall ensure that the PIU within MoWT is adequately staffed with full-time environmental and social personnel, including two (2) Environmental Specialists and two (2) Social Development Specialists, two GBV Specialists and two Occupational Health and Safety Specialists all with qualifications, experience, and terms of reference satisfactory to the Association, and provided with adequate resources to effectively manage environmental, social, health, and safety (ESHS) risks and impacts of the Project.</p> <p>2. The Recipient shall procure the Project Management and Monitoring Consultant and ensure that qualified Environmental and Social (E&S) Specialists are available to support the monitoring and management of E&S risks and impacts associated with the Project.</p>	<p>1. The Established PIU will include full time environmental and social specialists including 2 Environmental Specialists, 2 Social Development Specialists, 2 GBV Specialist and 2 Health and Safety Specialists prior to Effective Date and thereafter maintain the PIU and these positions throughout Project implementation.</p> <p>2. Prior to the commencement of the civil works, the recipient shall procure the Project Management and Monitoring Consultant and maintain these positions throughout Project implementation.</p>	MoWT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>1. Prepare and implement an Environmental, Social, Health and Safety (ESHS) system and capacity building plan for MoWT PIU, implementing agencies and key stakeholders on:</p> <ul style="list-style-type: none"> • The World Bank’s Environmental and Social Framework (ESF) • World Bank Group Environmental, Health and Safety (EHS) Guidelines • Occupational Health & Safety (OHS) and Community Health and Safety (CHS) • Emergency preparedness and response including reporting of incidents, accidents and complaints including maintaining an incident log. • Grievance Redress Mechanism (GRM) • Stakeholder Engagement • Resettlement Action Plan (RAP) Preparation and implementation • Environmental Restoration and Habitat Management • Gender Based Violence/Sexual Exploitation and Abuse/Sexual Harassment prevention and response measures and HIV/AIDs prevention and other communicable diseases • Training of contractors in UXO • Chance finds procedure • ESMP monitoring and reporting • Inclusion and non-discrimination of Vulnerable or Marginalized Individuals or Groups, including the Enhanced Implementation Support and Monitoring (EISM) to ensure: (i) Training of government staff and private sector consultants/clients, workers, and contractors on non-discrimination under respective Projects, including by identifying individuals and venues, as well as providing other logistical support; (ii) Training Project level GRM on non-discrimination, including by developing training materials, identifying venues, and providing trainers; (iii) Preparation of training modules for call center operators, data management personnel, and community outreach personnel on appropriate handling of sensitive information. 	<p>1. Capacity building plan is to be prepared within 3 months of Effective Date; training is to be conducted regularly and throughout Project implementation.</p>	MoWT
MONITORING AND REPORTING			
C	<p>REGULAR REPORTING</p> <p>1. Prepare and submit to the Association regular monitoring reports on environmental, social, health and safety (E&S) performance of the project.</p>		

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>The reports shall include:</p> <ul style="list-style-type: none"> • Status of preparation and implementation of E&S documents and actions required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanisms, the grievance log, and progress made in resolving them. • E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports. • All incidents and accidents that occurred during the reporting period, as well as cumulatively since Project Effective Date, and the incident log. • Number and status of resolution of incidents and accidents reported under action E below. • Status of E&S legal compliance • Status of RAP implementation. • Status of training under the ESHS systems and capacity building plan <p>The EISM will support monitoring of the risk of exclusion or discrimination of individuals or groups, with any additional required monitoring extended to vulnerable or marginalized individuals or groups. The Enhanced Implementation Support and Monitoring (EISM) mechanism will primarily focus on supporting the implementation of mitigation measures with support from the Association to address grievances and concerns from beneficiaries, communities, and workers relating to discrimination from Project benefits.</p>	<ol style="list-style-type: none"> 1. Submit quarterly reports to the Association throughout Project implementation, commencing within three months after the Effective Date. Submit each report to the Association no later than 30 days after the end of each reporting period. 	MoWT
<p>D</p> <p>CONTRACTORS' MONTHLY REPORTS</p> <ol style="list-style-type: none"> 1. Require Contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association. 	<ol style="list-style-type: none"> 1. Submit the monthly reports to the Association as annexes to the reports to be submitted under action C above. 	MoWT
<p>E</p> <p>INCIDENTS AND ACCIDENTS</p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ol style="list-style-type: none"> 1. Notify the Association of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request. 2. Arrange for an appropriate review (detailed investigation) of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence. 	<ol style="list-style-type: none"> 1. Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request. 2. Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association. 	MoWT
F	<ol style="list-style-type: none"> 1. Establish engagement and collaboration arrangements with the National Environment Management Authority (NEMA) to ensure that the Department of Environment Compliance and Department of Environment Enforcement and Field Operations carry out quarterly compliance monitoring of the approved subprojects under the project. <p>Establish engagement and collaboration arrangements with the Ministry of Defense to ensure that mine sweeping and scanning for unexploded ordinances (UXO) and other abandoned ordinances and improvised explosive devices (IEDs) are undertaken, in compliance with the relevant requirements of ESS4.</p>	<ol style="list-style-type: none"> 1. Prior to commencement of the subprojects' works and maintain until completion of the works. 	MoWT and NEMA
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ol style="list-style-type: none"> 1. Adopt, disclose and implement the Environmental and Social Impact Assessments (ESIAs), and corresponding Environmental and Social Management Plans (ESMPs) for the Project, consistent with the relevant ESSs. (Update or prepare, as applicable, the ESIAs for the road and weighbridge, and auxiliary sites under Part 1, and ESIAs for weighbridge, rest stations, roadside stations, vending stations, town roads, access roads to refugee settlements and associated auxiliary sites under Parts 2&3) 2. Carry out annual Environmental and Social audits. These shall be reviewed and cleared up by the Association. 	<ol style="list-style-type: none"> 1. ESIAs and ESMPs approved by the Association before disbursement for each respective Part, Sub-Part, or disbursement category to which they relate. 2. Annually, and to be completed within ninety days of end of 12 months following each of respective ESIA certificate's issue. 	MoWT
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <ol style="list-style-type: none"> 1. Incorporate all the relevant aspects of the ESCP, including, inter alia, the Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs), Labor Management Plan (LMP), the Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) Action Plan , the unexploded ordinance (UXO) chance finds procedure and the Code of Conduct, the requirement to prepare ESIAs/ESMPs for construction support facilities and obtain NEMA approval prior to establishing them, into the Environmental and Social (E&S) specifications of the procurement documents and contracts with contractors and supervising firms. Contractors will be encouraged to hire from local unskilled host populations, with an emphasis on women, and from refugee communities 2. Thereafter, ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts, and that contractors ensure their subcontractors also comply accordingly. Copies of relevant contracts provided to the Association upon request 	<ol style="list-style-type: none"> 1. Before signing the respective contracts and start of the relevant services of works. 2. Supervise contractors throughout Project implementation. 	MoWT and Contractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	3. Require Contractors to prepare, implement and update Contractor’s Environmental and Social Management Plans (C-ESMPs) in line with the project ESMPs.	3. Prior to commencement of construction activities and thereafter maintain throughout project implementation; and updated every six months.	
1.3	<p>TECHNICAL SUPPORT</p> <p>1. Ensure that all technical support activities under the Project including, inter alia, consultancies, capacity building, training, and any other studies are carried out in accordance with terms of reference (ToRs) acceptable to the Association and consistent with the World Bank Environmental and Social Standards (ESSs).</p> <p>2. Thereafter, ensure that the output of such activities are prepared and finalized in accordance with the ToRs, and in a manner acceptable to the Association.</p>	1 & 2 Throughout the Project implementation.	MoWT
1.4	<p>CONTINGENT EMERGENCY RESPONSE Financing</p> <p>1. Ensure that the CERC Manual includes a description of the E&S assessment and management arrangements including, if applicable, any CERC that will be included or referred to in the CERC Manual for the implementation of Part 4 of the Project, in accordance with the ESSs.</p> <p>2. Implement the E&S provisions of the CERC Manual including, if applicable, the CERC-, and any assessments and plans required therein.</p>	<p>1. The preparation of the CERC Manual and if applicable the CERC, all in form and substance acceptable to the Association is a withdrawal condition under Section 1(F) of Schedule 2 of the Agreement.</p> <p>2. In accordance with the timeframes specified in the CERC Manual including, if applicable, the CERC-, and any assessments and plans required therein.</p>	MoWT
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ol style="list-style-type: none"> 1. Prepare, disclose, and implement Labor Management Plan (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA, SH and inclusion and non-discrimination of any individuals or groups), forced labor, child labor, grievance arrangements for Project workers, UXO management and response plan and applicable requirements for contractors, subcontractors, and supervising firms. 2. Require contracts for the direct workers and contracted workers to incorporate relevant aspects of ESS2 and national labor laws, including, particularly, on terms and conditions of employment, occupational health and safety, codes of conduct (CoC) (including signing CoC relating to SEA/SH and on inclusion and non-discrimination of any individuals or groups), and grievance management systems for Project Workers. 3. The Project Implementation Manual shall include a hotline and EISM measures, as well as further details on the CoC for the Project. 	<ol style="list-style-type: none"> 1. Adopt, disclose the LMP by effectiveness and thereafter implement the LMP throughout the Project implementation. 2. Throughout the Project implementation 	MoWT
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</p> <ol style="list-style-type: none"> 1. Prepare and implement an Occupational Health and Safety Management Plan (OHSMP) with adequate occupational health and safety measures taking care of all contracts and managing the OHS risks and impacts. 	<ol style="list-style-type: none"> 1. Prepare and adopt the OHSMP prior to commencement of any construction or physical works and thereafter implement throughout project implementation. 	MoWT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.3	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>1. Establish, maintain, and operate a grievance mechanism (GM) for all Project workers as described in the Labor Management Procedures (LMP) and consistent with the requirements of Environmental and Social Standard 2 (ESS2). The grievance mechanism shall be accessible, confidential, and responsive, and shall allow workers to raise individual and workplace concerns including issues related to terms and conditions of employment, labor rights, workplace safety, discrimination, or sexual exploitation and abuse/harassment (SEA/SH) without fear of retaliation.</p>	<p>1. The mechanism shall be established and operationalized before engaging Project workers (including contracted) and shall be maintained and operated throughout Project implementation.</p> <p>2. Maintain throughout Project implementation.</p>	MoWT
2.4	<p>INSPECTION ON LABOR AND WORKING CONDITIONS AND OCCUPATIONAL HEALTH AND SAFETY</p> <p>3. Establish engagement and collaboration arrangements with MoGLSD to ensure the Department of Occupational Safety and Health and Department of Labor, Industrial Relations and Productivity, carries out quarterly and required inspections of labor and working conditions and OHS issues of workers in the civil works.</p>	Prior to commencement of works on any of the sites and throughout project implementation.	MoWT, MoGLSD
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>1. Develop, adopt and implement a Waste Management Plan (WMP), as part of the ESMPs prepared for the Project, to manage hazardous and non-hazardous waste, consistent with ESS3.</p> <p>WATER MANAGEMENT PLAN</p> <p>2. Develop, adopt, and implement a Water Management Plan as part of the ESMPs prepared for the Project, to manage water abstraction and use, consistent with ESS3.</p>	<p>Same timeframe as development of ESIA and ESMPs in section 1.1 and implement the WMP and</p> <p>Water Management Plan throughout the Project life cycle.</p>	MoWT
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ol style="list-style-type: none"> 1. Incorporate resource efficiency and pollution prevention and management measures in the ESMPs to be prepared under action 1.1 above. 2. Contractors shall be required to obtain construction materials from established and legally licensed quarries and borrow pits, following prior environmental and social due diligence in accordance with national regulations and the ESSs. Before any new quarries or borrow pits are used, appropriate assessments including ESIA and RAPs (for quarries) must be developed, adopted and fully implemented, all in a manner satisfactory to the Association and all relevant statutory permits and licenses must be secured. The recipient will ensure that agreements reflect a willing buyer-willing seller arrangement, with active participation from individuals and local communities regarding quarries and ancillary sites. 	<ol style="list-style-type: none"> 1. Same timeframe as development of the ESMP in section 1.1 above. 2. Throughout Project implementation, all assessments and obtaining of all appropriate permits or licenses for new quarries/borrow pits to be made prior to mobilization and utilization of such quarry or borrow pit. 	MoWT
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <ol style="list-style-type: none"> 1. Incorporate measures to manage traffic and road safety risks as required in the ESMPs to be prepared under action 1.2 as outlined above. 2. Implement measures and actions to assess and manage traffic and road safety risks to the community resulting from movement of Project vehicles or activities which may present safety risks on public roads, etc. The measures shall be incorporated into the ESMPs. 	<ol style="list-style-type: none"> 1. Same timeframe as for the development of the ESMPs in section 1.1 above 	MoWT
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <ol style="list-style-type: none"> 1. Assess and manage specific risks and impacts to the community arising from Project activities, including but not limited to, the behavior of Project workers, risks of labor influx, such as the spread of HIV/AIDS and other communicable diseases, response to emergency situations, establishment and/or use of construction support facilities such as quarries, borrow pits, asphalt plants, and camp sites, and include mitigation measures with particular attention to vulnerable groups including refugees in the C-ESMPs to be prepared in accordance with the ESIA, ESMPs and the ESCP. 	<ol style="list-style-type: none"> 1. Same timeframe as for the development of the ESMP in section 1.1 above and the implementation of the ESMPs while undertaking activities involving communities. 	MoWT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>2. The OHSMP to be developed as outlined in Section 2.2 above shall include measures to assess and manage health and safety risks and impact on the community arising from the project activities and included in the C-ESMP to be prepared in accordance with the ESMPs. The OHSMP will also include the UXO management and response plan to ensure the safety of both workers and the community.</p>		
4.3	<p>Sexual Exploitation and Abuse (SEA) AND Sexual Harassment (HS) Risks</p> <p>1. Prepare, adopt, and implement a SEA/SH Action Plan to assess, prevent, and respond to SEA/SH risks associated with the Project, in accordance with the Association’s SEA/SH risk assessment tool, the relevant Environmental and Social Standards (ESSs), and in a manner acceptable to the Association.</p> <p>The SEA/SH Action Plan shall include, at a minimum, measures for:</p> <ul style="list-style-type: none"> • Awareness raising and training for workers and communities. • Codes of conduct for all Project workers (including contractors and subcontractors); • Survivor-centered grievance redress mechanisms; and • Engagement with relevant service providers for survivor support. <p>2. The SEA/SH Action Plan shall be prepared as a standalone document and will be integrated into the Labor Management Procedures (LMP) and/or Environmental and Social Management Plan (ESMP), as applicable, and shall be finalized and disclosed prior to the commencement of any civil works and implemented throughout Project implementation.</p>	<p>1. Adopt the SEA/SH Prevention and Response Action Plan thirty days prior to contractor mobilization on site and thereafter implement the Plan throughout Project implementation.</p>	MoWT
4.4	<p>SECURITY PERSONNEL</p> <p>1. Identify and implement measures and actions satisfactory to the Association (to be submitted to the Association for approval) to assess and manage the risks to human security of project-affected communities and project workers that could arise from the use of security personnel.</p> <p>2. Where contractors will engage armed security personnel, ensure that C-ESMPs include arrangements for the use of security forces, in line with ESS4, that ensure no security personnel is deployed without prior specific training on the safeguard requirements, and that due diligence is undertaken on any security service provider.</p>	<p>1. Assess risks and identify measures and actions as part of ESIA and ESMPs in Section 1.1 and 1.2.</p> <p>2. Implement such measures and actions, once adopted, throughout Project implementation.</p>	MoWT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.5	<p>TRAINING FOR THE COMMUNITY:</p> <p>1. Conduct training for the community designed to raise awareness of E&S risks and to mitigate impacts specified in this section.</p>	<p>1. Prior to initiating construction works in the community's location, with regular refresher training afterwards.</p>	MoWT
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>1. Prepare a Resettlement Action Plan (RAP), including Livelihood Restoration Plans (LRPs) as applicable, for Part 1, and for other facilities that require RAPs prior to land acquisition in accordance with ESS5. MoWT will ensure that affected people are meaningfully consulted, timely compensated and that livelihoods are restored or improved. All Project Affected Persons will be compensated at full replacement cost prior to any Project activities that result in displacement, in accordance with ESS5.</p> <p>2. MoWT shall allocate counterpart funding for the implementation of RAPs and LRPs and provide evidence to the Association.</p> <p>3. All RAPs must be approved by the Association and disclosed both by the Association and MoWT.</p>	<p>1. Site specific resettlement plans shall be submitted for the Association's approval and once approved, implemented prior to commencing respective Project activities that involve land acquisition and resettlement. LRPs will be implemented as part of the resettlement plans, prior to carrying out any works, including ensuring that before taking possession of the land and related assets, full compensation has been provided and, as applicable, displaced people have been resettled and moving allowances have been provided.</p>	MoWT
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	1. Develop, adopt and implement measures and actions satisfactory to the Association (to be submitted to the Association for approval) to assess and manage risks and impacts on biodiversity, including identification of different types of habitats that may be affected, prepared as part of the ESIA and ESMPs under 1.1 and 1.2.	1. During preparation and implementation of ESIA and ESMPs prepared under sections 1.1 and 1.2	MoWT
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	N/A		
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS 3. Adopt and implement measures for safeguarding cultural heritage sites in accordance with the guidelines of the Project ESIA under 1.1, and consistent with ESS8. MoWT shall identify cultural heritage sites for exclusion from the implementation of Project activities to the extent possible. Where exclusions cannot be made, measures to address risks and impacts on cultural heritage will be included in the sub-Project ESMPs.	1. Adopt measures indicated in the ESIA, prior to the start of activities, and thereafter implement them throughout the Project implementation period.	MoWT and all key stakeholders
8.2	CHANCE FINDS 1. Implement the chance finds procedures as will be provided for in the ESIA under 1.1	1. Adopt chance finds procedures as will be outlined in the ESIA and ESMPs prior to the start of activities and thereafter implement throughout the Project implementation period.	MoWT
ESS 9: FINANCIAL INTERMEDIARIES			
	N/A		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN 1. Prepare, adopt and implement the SEP consistent with ESS10, including measures to 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. Document the stakeholder	1. The SEP was disclosed on March 12, 2026, and will be implemented and updated	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>engagement activities, including (i) stakeholders mapping, (ii) description of consultations and participation mechanisms utilized, and records of meetings held, (iii) feedback received and responses to said feedback and (iv) measures to engage stakeholders who, because of their particular circumstances, may be disadvantaged or vulnerable.</p> <p>2. MoWT will disclose all key relevant information.</p>	<p>throughout the Project implementation.</p> <p>2. Throughout the Project implementation.</p>	<p>MoWT and in collaboration with all other key stakeholders</p>
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>1. Through MoWT, maintain, and operate an accessible and integrated grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>2. Through MoWT, ensure that grievance status is provided in the quarterly reports</p> <p>3. 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>4. Strengthen the Operation GRM through the EISM (with support from the Association) to ensure that the grievance mechanism includes an effective, safe, ethical, and confidential mechanism to receive, manage, refer, and monitor grievances related to exclusion and discrimination.</p>	<p>1. The grievance mechanism shall be established and operationalized prior to the implementation of activities. The mechanism shall be maintained and shall remain operational throughout Project implementation.</p>	<p>MoWT and all other key stakeholders.</p>
INDICATORS FOR IMPLEMENTATION READINESS.			
<p>The following actions are indicators for implementation readiness:</p> <p>A. Recruitment of 2 full-time qualified Environmental Specialists, 2 Social Development Specialists, 2 Health and Safety Specialists, and 2 GBV specialists prior to the Effective Date and thereafter maintain these positions throughout Project implementation.</p>			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none"> B. Finalize a capacity building plan within three months after the Effective Date and thereafter implement it during the Project implementation. 1.1 Adopt the ESIA's and their annexes prior to implementation of Project activities and thereafter implementation throughout Project implementation. 2.2 Prepare and adopt the Labor Management Plan prior to commencement of any construction or physical works and implement the LMP throughout Project implementation. 2.3 Prepare and adopt a Occupational Health and Safety Management Plan prior to commencement of any construction or physical works and thereafter implement throughout Project implementation. 2.4 Establish and operationalize the workers grievance mechanism before engaging Project workers 5.1 Prepare the RAP for under 5.11 and submit for the Association's approval and once approved, implemented prior to commencing respective Project activities that involve land acquisition and resettlement. 10.1 The SEP consistent with ESS10 was disclosed on March 12, 2026, and will be updated and implemented throughout Project implementation. 		