

**Saint Vincent and the Grenadines**  
**BERYL EMERGENCY RESILIENT RECOVERY**  
**PROJECT (P507316)**

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

**FINAL**

**September 18, 2024**

V1: Draft for DM (August 15, 2024)

V2: Incorporating comments from WB and GoSVG (August 30, 2024)

V3: Incorporating comments from WB and GoSVG reviews and cleared for disclosure (September 4, 2024)

V4: Incorporating comments from LEG (September 11, 2024)

V5: Updated following negotiations (September 18, 2024)

## **ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. Saint Vincent and the Grenadines (the Recipient) will implement the Beryl Emergency Resilient Recovery Project (the Project), with the involvement of the MoFEPIT, MoNM, MoUD, MoA, ~~MOE~~, VINLEC, NEMO, MoT, MoTW, BRAGSA, and CWSA, as set out in the Financing Agreement (the Agreement). The International Development Association (the Association), has agreed to provide financing for the Project, as set out in the Agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the 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 agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Representative 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 SUPPORT			
A	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>a. Assign qualified environmental and social specialists from PSIPMU to support and oversee the management of environmental, social, health and safety (E&amp;S) risks and impacts of the Project prior to and during the establishment of the dedicated Project team. Tasks to be undertaken include: gathering data to demonstrate activities (including for retroactive financing) comply with the Association's ESF and relevant national regulations; preparing E&amp;S documentation; undertaking stakeholder engagement and E&amp;S screening; establishing processes and procedures in the Project Operations Manual.</p> <p>b. Hire one environment specialist and one social specialist.</p> <p>c. Hire one environmental assistant and one social assistant.</p>	<p>a. Environmental and social specialists to be assigned as needed prior to the hiring of dedicated E&amp;S specialists to the Project team, and thereafter maintained to provide oversight and assistance as required to the Project team throughout Project implementation.</p> <p>b. Agree with the Association the terms of reference for the specialists no later than 30 days after the Effective Date and onboard individuals no later than 90 days after the Effective Date.</p> <p>c. Agree with the Association the terms of reference for the specialists no later than 30 days after the Effective Date, and onboard individuals no later than 90 days after the Effective Date.</p>	MoFEPIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	<p><b>CAPACITY BUILDING PLAN/MEASURES</b></p> <p>a. Prepare and implement training for Project team staff, design consultants, contractors, and relevant government agencies on the E&amp;S project requirements and the implications for their roles and responsibilities in implementing the project.</p> <p>b. Participate in training on ESHS matters, including (i) <i>environment, social and health and safety considerations in design</i>, (ii) <i>integrating ESHS into procurement process</i> and (iii) <i>contract management for ESHS performance</i>.</p> <p>c. Prepare, implement or participate in additional training and capacity development events as the need arises during the implementation of the project.</p> <p>d. Ensure MoTW provide the engineering standards and building codes to achieve resilient infrastructure for incorporation into the terms of reference for the engineering designers.</p> <p>e. Agree on a program with MoUD and/or MoTW for electrical inspection, and building/construction inspection to ensure compliance of construction works with building codes. Ensure that the inspections are undertaken at the appropriate stages of construction works and that the certificates are obtained prior to completion of the relevant works.</p>	<p>a. Training program to commence no later than 180 days after the Effective Date.</p> <p>b. Prior to finalization of first (i) design consultant's terms of reference, (ii) bidding documents for works and (iii) start of works contract.</p> <p>c. Throughout Project implementation.</p> <p>d. Prior to finalization of each design consultant's terms of reference.</p> <p>e. As needed to progress the works in accordance with the agreed construction program.</p>	MoFEPIT
MONITORING AND REPORTING			
C	<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. The reports shall summarize the ESHS activities undertaken during the reporting period including but not limited to:</p> <ul style="list-style-type: none"> <li>• Part 2 activity proposals reviewed and screened.</li> <li>• Advice provided to align Part 1 and Part 2 activities with E&amp;S requirements.</li> <li>• Status of the E&amp;S documents required for each project activity.</li> <li>• Status of consents/permits/licenses required for each activity and status of applications.</li> <li>• Involvement in design discussions/reviews.</li> <li>• Inputs into procurement process, including preparation of terms of reference or E&amp;S specifications, and bids reviewed.</li> <li>• No of inspections/surveys/site visits undertaken, including for screening/scoping, team discussions, surveys or data gathering, or supervision of works (and key issues noted).</li> <li>• Summary of stakeholder engagement activities carried out.</li> <li>• Details of complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them.</li> <li>• Incidents or accidents that have occurred and the status of investigations and remedial actions.</li> </ul>	<p>Submit quarterly reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than 30 days after the end of each reporting period.</p>	MoFEPIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
D	<p><b>CONTRACTORS' MONTHLY REPORTS</b></p> <p>Submit a copy to the Association of each contractor's and supervising engineering consultant's monthly monitoring reports, prepared in accordance with contract requirements.</p>	Submit the monthly reports to the Association upon request throughout implementation.	MoFEPIT
E	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Notify the Association of any incident or accident which is likely to or has had a significant adverse effect on the environment, public/communities, or workers, including: death or significant injury; 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.</p> <p>Undertake or arrange for an appropriate investigation of the incident or accident to establish its immediate, underlying and root causes, and identify the relevant systems and processes for ESHS management that need review or strengthening to prevent recurrence. Prepare 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 to the satisfaction of the Association.</p>	<p>Notify the Association within 24 hours of learning of the incident, and details as available upon request.</p> <p>Provide to the Association's satisfaction an investigation report within 10 days of the date of the incident, and a Corrective Action Plan within 30 days of the date of the incident, unless a different timeframe is agreed to in writing by the Association.</p>	MoFEPIT
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b></p> <p>1. Prepare and implement an Environmental and Social Management Framework (ESMF) that describes the organization and arrangements for identifying and managing E&amp;S risks and impacts. The ESMF will provide:</p> <ol style="list-style-type: none"> <li>Maps showing the locations of E&amp;S baseline features, such as protected areas, rare species records, mangroves, potential areas of contaminated land/materials, aquifers, rivers, water abstractions &amp; discharges, cultural heritage features, sensitive receptors including schools, medical facilities, cemeteries, churches etc.</li> <li>Summary details of the licenses, consents, permits, and approvals that may be needed to comply with the Recipient's E&amp;S law and regulations, what the supporting information is needed to support applications, and at what point of each activity they will be obtained.</li> <li>Summary of the key requirements of the ESF pertinent to the activities to be undertaken.</li> <li>An organization chart showing the roles for managing the identification of the ESHS risks and impacts, their inter-relationships and reporting lines.</li> <li>A process chart (with associated checklists or decision points, including to identify ineligible activities) showing how E&amp;S risks will be screened and managed during project activities, and how E&amp;S information required will be obtained to feed into the design, procurement and construction phases.</li> </ol>	<p>1. Prepare and adopt the ESMF acceptable to the Association, by no later than 30 days after the Effective Date and implement thereafter throughout Project implementation.</p> <p>2.&amp;3. As and when required to support the project program (i.e. surveys/study reports prior to finalization of ESIA/ESMPs, which are needed prior to finalization of design), or otherwise agreed with the Association.</p>	MoFEPIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>2. Prepare or cause to be prepared, as informed by the ESMF and when agreed with the Association, Environmental and Social Impact Assessment (ESIA), surveys, assessments and/or Environmental and Social Management Plans (ESMP) for individual activities sufficient to understand the E&amp;S risks and impacts, and to identify the controls or mitigation needed to comply with ESF requirements. Provide the ESIA, survey report, assessment report, and/or ESMP to the Association for review and approval prior to any activities being implemented.</p> <p>3. Action or cause to be actioned the findings of the approved ESIA, survey report, assessment report and/or ESMP by:</p> <ul style="list-style-type: none"> <li>a. Integrating appropriate requirements into the design consultants' terms of reference and undertaking design reviews and checks to confirm solutions are appropriate.</li> <li>b. Ensure appropriate E&amp;S specifications are included in the E&amp;S requirements of bidding documents such that the contractor is obligated to deliver the controls or mitigation described in the ESIA, survey report, assessment report and/or ESMP during construction works; and</li> <li>c. Advising future maintainers or operators of required actions.</li> </ul>		
1.2	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>1. Ensure E&amp;S specifications of the procurement documents and subsequent works contracts are appropriate to deliver the works in compliance with the ESCP, including inter alia:</p> <ul style="list-style-type: none"> <li>1.1 <i>Environmental and Social Assessments and/or Plans,</i></li> <li>2.1 <i>Labor Management Procedures (including code of conduct),</i></li> <li>2.2 <i>Occupational Health and Safety Management,</i></li> <li>3.1 <i>Waste Management Planning,</i></li> <li>4.1 <i>Traffic and Road Safety, and</i></li> <li>8.2 <i>Chance Finds,</i></li> </ul> <p>2. Ensure that the terms of reference for the supervising engineer/consultant contain adequate tasks, include codes of conduct, and require appropriately skilled specialists to enforce compliance with contract requirements.</p> <p>3. Thereafter oversee the work of the supervising engineer/consultant to ensure they enforce the works contract and that the contractors and their subcontractors comply with the E&amp;S requirements including code of conduct. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association.</p>	<p>1. As part of the preparation of procurement documents and prior to the issuance of works request for proposals or request for bids.</p> <p>2. Supervise engineer/consultant and contractors throughout Project implementation. Copies of relevant contracts provided to the Association upon request.</p> <p>3. Throughout the project.</p>	MoFEPIT
1.3	<p><b>TECHNICAL ASSISTANCE</b></p> <p>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 duly incorporate and take into consideration the requirements of the ESSs.</p>	Throughout project implementation.	MOFEPIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.4	<p><b>ACTIVITIES SUBJECT TO RETROACTIVE FINANCING</b></p> <p>Provide the information requested by the Association (as agreed pursuant to <i>SVG Project Beryl (P507316) Environmental and Social requirements for Retroactive Financing from the WBG</i> dated 6<sup>th</sup> September 2024) to demonstrate that activities proposed for retroactive financing have been implemented and delivered outcomes consistent with the ESF.</p>	Data to be collected and provided one month prior to application for retroactive financing.	MoFEPIT
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Prepare and implement a Labor Management Procedures (LMP) for the Project. The LMP will describe: the types of workers to be employed; the regulatory requirements that will govern the employment of workers, and any additional measures to ensure compliance with ESS2; the contractual arrangements (including details of their terms and conditions, pay, hours of work, holiday and other entitlements) that will apply; the approach for recruiting workers (reflecting requirements for non-discrimination, equal opportunity and avoidance of forced/trafficked and child labor) and managing labor influx; a mechanism dedicated for workers to submit workplace-related grievances; and procedures on how to address SEA/SH related grievances in line with World Bank policies. The LMP will include the applicable Code of Conduct, as found in the World Bank's Standard Procurement Documents for Works.</p> <p>The LMP will be reviewed and updated as required, considering the activities to be undertaken in each site-specific project activities and as additional project activities unfold entailing additional labor related risks or issues.</p>	<p>Prepare the LMP to meet the timeframe described in section 1.1 <i>Environmental &amp; Social Assessments and/or Plans</i> (i.e. to input into designers' terms of reference, procurement documents etc.).</p> <p>Throughout project implementation.</p>	MoFEPIT
2.2	<p><b>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT</b></p> <p>a. Carry out a risk assessment of activities to be undertaken by labor intensive temporary employment workers for the approval of the Association and use this to establish a safe method for undertaking the work and to identify any necessary safety equipment.</p> <p>b. Prepare training based on WBG Korean Green Growth Trust Fund <a href="#">General Induction: Safety, Health and the Environment</a> to include details for managing wastes prepared under 3.1 Waste Management and deliver to all workers. Issue safety equipment/personal protective equipment as needed for each activity being undertaken.</p> <p>c. Ensure appropriate E&amp;S Specifications are included within the bidding documents and subsequent works contracts so the OHS Manual to be prepared for larger scale works or those undertaken by experienced contractors includes risk assessments used to establish the safe working methods and personal protective equipment requirements. For small scale works or where inexperienced contractors are involved, the specific safe methods for undertaking key activities will be specified in the bidding documents and subsequent works contracts.</p>	<p>a., &amp; b. Prior to the start of labor intensive temporary employment works.</p> <p>c. As part of the preparation of procurement documents and prior to the issue of works request for proposals or request for bids.</p>	<p>a., &amp; b. BRAGSA</p> <p>c. MoFEPIT</p>
2.3	<b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	As per the timeframe for 2.1, and in any case prior to engaging Project workers. Thereafter maintain and operate the grievance mechanism throughout Project implementation.	
2.4	<b>PROJECT WORKERS TRAINING</b> Implement, and require contractors and supervision consultants to implement, capacity building activities for Project workers, designed to raise awareness about risks of sexual exploitation or abuse and sexual harassment, and health and safety in the workplace, and the measures to manage these risks. Specifically, the capacity building activities shall include training on: <ul style="list-style-type: none"> <li>• Codes of conduct and other topics related to managing risks stemming from labor influx and workforce management, for contractors.</li> <li>• Occupation health and safety and emergency response, including for any community workers.</li> <li>• Awareness of the labor grievance mechanism under the Project, for all Project workers.</li> </ul>	Throughout project implementation.	MOFEPIT
2.5	<b>CODE OF CONDUCT</b> Ensure provisions in the bidding documents for contractors and supervision consultants to establish a code of conduct to be signed by all workers, including any subcontractors, and establishing the minimum content of said code. The code of conduct must be based on the guidelines contained in the LMP and the ESMF and should address, among other issues, the risk of sexual exploitation and abuse and sexual harassment in the workplace.	Before awarding the contract.	MOFEPIT
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<b>WASTE MANAGEMENT PLANNING</b> Describe the process for identifying and characterizing wastes encountered, their management and subsequent disposal in accordance with ESS3 during: <ol style="list-style-type: none"> <li>Debris clearance and provide to the Association as part of section 1.4 Activities Subject to Retroactive Financing</li> <li>Labor intensive temporary employment works</li> <li>Activities under Part 2 of the Project.</li> </ol>	<ol style="list-style-type: none"> <li>As per section 1.4 above.</li> <li>As per section 2.2b and prior to start of labor intensive temporary employment works.</li> <li>As part of the preparation of procurement documents and prior to the issue of works request for proposals or request for bids.</li> </ol>	MoFEPIT
3.2	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> Incorporate resource and energy efficiency measures to accord with ESS3 and as may be pertinent from ESHGs in the designers' terms of reference for works under Part 2 of the Project.	Prior to the issuance of designers' terms of reference	MoFEPIT



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>TRAFFIC AND ROAD SAFETY</b> a. Ensure designs for roads and bridges meet Good International Industry Practice (as agreed with the Association) with respect to safety, by including clear safety standards and design review requirements in the designers' terms of reference. b. Ensure E&S specifications are included in the bidding documents and subsequent works contracts for planning and agreeing on traffic management measures in line with Good International Industry Practice to be implemented during construction works to protect workers, the community, and all road users.	a. Prior to the issuance of designers' terms of reference b. As part of the preparation of procurement documents and prior to the issue of works request for proposals or request for bids.	MoFEPIT
4.2	<b>COMMUNITY HEALTH AND SAFETY</b> Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from Project activities including, inter alia, risks of exposing communities to adverse development initiatives, behavior of Project workers, risks of labor influx, and include these measures in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Association.	To meet the timeframe described in section 1.1 ( <i>Environmental &amp; Social Assessments and/or Plans</i> )	MOFEPIT
4.3	<b>INFRASTRUCTURE DESIGN AND SAFETY</b> a. Identify and agree with the Association the appropriate engineering standards and building codes to be used in designing the infrastructure works under Part 2 of the Project. b. Ensure that the Recipient's building inspectors working with the projects supervising consultants verify that construction has been undertaken in accordance with the relevant building codes to achieve resilient recovery as agreed with the Association.	a. Prior to the issuance of designers' terms of reference b. Prior to works contract completion	MoFEPIT
4.4	<b>SEA AND SH RISKS</b> Prepare and implement a SEA/SH Action Plan to assess and manage the risks of SEA and SH.	Prepare the SEA/SH Action Plan to meet the timeframe described in section 1.1 ( <i>Environmental &amp; Social Assessment and/or Plans</i> ) or by no later than six months after the Effective Date whichever is earlier. Thereafter implement the SEA/SH Action Plan throughout Project implementation.	MoFEPIT
4.5	<b>UNIVERSAL ACCESS</b> Where technically and financially feasible, reconstruction and civil work designs shall incorporate the concept of universal access as part of works' design. This includes restoration/replacement of ramps, elevators, and toilets for persons with disabilities, and incorporation of new or additional universal access provisions whenever technically and financially feasible.	Prior to the issuance of designers' terms of reference	MOFEPIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<b>RESETTLEMENT POLICY FRAMEWORK</b> a. Adopt a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5. b. Prepare and implement a Resettlement Plan(s) as and when needed, according to the principles enunciated in the RF. C. Until the finalization of the RPF, the Project shall follow the screening tools, consult with stakeholders, and prepare the RAPs based on the existing RPF of the Volcanic Eruption Emergency Project (P176943) and submit the screening reports and RAPs to the Association for review and approval before carrying out the associated activities, consistent with ESS5	a. Adopt the RPF prior to any resettlement actions associated with the project and no later than 90 days after the Effective Date. b. Prepare and implement RPs during Project implementation as and when needed, but before taking land or related assets.	MoFEPIT
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS</b> Undertake surveys and obtain records as needed to identify baseline conditions of important marine and terrestrial species that may be affected by project activities. Use the baseline to assess the potential impacts, modify designs so activities avoid significant biodiversity impacts and to identify other appropriate controls and mitigation measures.	To meet the timeframe described in section 1.1 ( <i>Environmental and Social Assessment and/or Plans</i> ).	MoFEPIT
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
<b>Not Relevant</b>			
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<b>CULTURAL HERITAGE RISKS AND IMPACTS</b> Prepare and implement a Cultural Heritage Management Plan (CHMP) consistent with ESS8 when features of cultural significance may be affected by activities and include within the ESIA and/or ESMPs prepared as part of the Environmental and Social Assessments and/or Plans referred to in section 1.1 above.	To meet the timeframe described in section 1.1 ( <i>Environmental and Social Assessment and/or Plans</i> ).	MoFEPIT
8.2	<b>CHANCE FINDS</b> Ensure that an appropriate chance finds procedure is incorporated into all works contracts, and that training is provided.	As part of the preparation of procurement documents and prior to the issue of works request for proposals or request for bids.	MoFEPIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
<b>Not Relevant</b>			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN</b> Update, finalize and implement the initial Stakeholder Engagement Plan (SEP) prepared for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	No later than 60 days after the Effective Date; and thereafter implement the SEP throughout Project implementation.	MoFEPIT
10.2	<b>PROJECT GRIEVANCE MECHANISM</b> Establish, maintain, and operate a grievance mechanism (GM), as described in the SEP and in a manner consistent with ESS10. The GM shall 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. The GM 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, in a safe, confidential, and survivor-centered manner.	No later than 60 days after the Effective Date; and thereafter implement the GM throughout Project implementation.	MoFEPIT
<b>INDICATORS FOR IMPLEMENTATION READINESS</b>			
The actions from the following sections of the ESCP are indicators for implementation readiness: A: Allocation of Staff and agreed TORs 1.1 Approved ESMF 2.1 Approved LMP 10.1 Approved SEP			