KINGDOM OF CAMBODIA

Nation Religion King

MINISTRY OF RURAL DEVELOPMENT

Cambodia Southeast Asia Disaster Risk Management project II (P177185)



ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

Final Version

(10 February 2022)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

- 1. The Royal Government of Cambodia (hereinafter RGC) shall implement the Cambodia Southeast Asia Disaster Risk Management Project II (the **Project**), through the Ministry of Rural Development (MRD) and with the involvement of the following Ministries/agencies/units, including the Ministry of Economy and Finance (through their General Department of Resettlement), and provincial Departments of Rural Development at six project provinces. The International Development Association (hereinafter "Association") has agreed to provide financing for the Project.
- 2. The RGC shall implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (ESSs). This Environmental and Social Commitment Plan (ESCP) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
- 3. The RGC 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 Environmental and Social Management Framework (ESMF), Resettlement Planning Framework (RPF), Indigenous Peoples Planning Framework (IPPF), Labor Management Procedures (LMP), Stakeholder Engagement Plan (SEP), and other required E&S documents, and the timelines specified in those E&S documents.
- 4. The RGC shall be responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry of Rural Development, and related agencies or units referenced in paragraph 1 (above).
- 5. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Association by the MRD through MRD's Project Management Unit (hereinafter PMU) as required by the ESCP and the conditions of the Financing Agreement. The Association shall monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
- 6. As agreed by the Association and the RGC, through MRD, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the RGC, through MRD, 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 RGC, through MRD. The MRD shall promptly disclose the updated ESCP.
- 7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the RGC, through MRD, shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include risks and impacts that are relevant to the Project, such as environmental, social, health, and safety impacts, labor influx, gender-based violence.

	TIMEFRAME	RESPONSIBILE ENTITY/AUTHORITY		
MONITORING AND REPORTING				
As a part of its regular project reporting, 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, stakeholder engagement activities, functioning of the grievance mechanism(s). More details on monitoring and reporting will be provided in the Project E&S documents, e.g. ESMF, RPF, IPPF, LMP, SEP and site-specific plans.	Starting from the Effective Date • Quarterly internal ESHS monitoring reports shall be submitted to the Association by the end of the first week of the reporting period throughout project implementation. • Semi-annually reporting throughout Project implementation to the Association.	PMU of MRD		
INCIDENTS AND ACCIDENTS Prepare and operationalize the Incident Reporting Mechanism 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 road traffic related accidents on the project roads and other incidents occurred in the project construction sites or related to project financed civil works. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information	Notify the Association of any accident within 24 hours and no later than 48 hours after becoming aware of the occurrence of the incident or accident. A more detailed report will be provided within 3 business days	PMU of MRD		
	As a part of its regular project reporting, 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, stakeholder engagement activities, functioning of the grievance mechanism(s). More details on monitoring and reporting will be provided in the Project E&S documents, e.g. ESMF, RPF, IPPF, LMP, SEP and site-specific plans. INCIDENTS AND ACCIDENTS Prepare and operationalize the Incident Reporting Mechanism 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 road traffic related accidents on the project roads and other incidents occurred in the project construction sites or related to project financed civil works. Provide sufficient detail regarding the incident or accident, indicating immediate	As a part of its regular project reporting, 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, stakeholder engagement activities, functioning of the grievance mechanism(s). More details on monitoring and reporting will be provided in the Project E&S documents, e.g. ESMF, RPF, IPPF, LMP, SEP and site-specific plans. Semi-annually reporting throughout project implementation to the Association. Semi-annually reporting throughout project implementation to the Association. Submit annual progress report to the Association. Notify the Association of any 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 road traffic related accidents on the project molecular than 48 hours after becoming aware of the occurrence of the incident or accident. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided within 3 business days after the occurrence of the incident		

MATER	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBILE ENTITY/AUTHORITY
С	CONTRACTORS AND CONSULTANT'S MONTHLY REPORTS PMU shall specify detailed requirements on report preparation and submission in the contracts to be signed with PMU's contractors and consultants. The contractors are required to prepare and submit Contractor's ESMP (C-ESMP) and Contractor's LMP (C-LMP) to PMU for review and clearance before commencing construction. The consultants are required to prepare and submit an Inception Report to PMU for review and clearance prior to implementation.	Monthly progress and ESHS monitoring reports shall be prepared by PMU's Contractors and Consultants for submission to PMU throughout the project implementation.	Contractors PMU's Consultants, including Detailed Design and Implementation Support consultants, E&S consultants will prepare monthly progress report.
	Subsequently, the contractors are required to submit monthly ESHS monitoring report to the PMU. ESHS report should include details on project's environmental and social performance against requirements set out in C-ESMP and C-LMP. Similarly, Construction Supervision Consultants are required to prepare and submit monthly the ESHS Monitoring Reports to PMU.		
	PMU will provide above mentioned reports, in a consolidated form, to the Association on a quarterly basis, and on Association's request	Quarterly ESHS reports will be prepared by PMU for submission to the Association throughout the project implementation.	
ESS 1:	ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACT		
1.1	ORGANIZATIONAL STRUCTURE		
	Establish and maintain throughout project life a Project Management Unit (PMU) within the MRD for day-to-day project implementation. The PMU will be comprised of qualified staff appointed from MRD's respective departments, and individual consultants recruited externally for expertise that MRD does not have. In addition, PMU will hire consulting firms to monitor project's construction activities. MRD will ensure the PMU is timely and sufficiently staffed for effective management of E&S risks and impacts under all subprojects. It is expected that PMU will engage (as reflected in the ESMF) Detailed Design Implementation and Supervision (DDIS) Consultant, E&S Consultant, and Independent Social and Environment Monitoring Consultant (ISEMC), and Environmental Health and Safety Officer (EHSO) for project implementation support. In particular, PMU will appoint at least one environmental officer, one social officer and one GRM officer who will be responsible for monitoring the functioning of project's grievance redress mechanism.	Established within 30 days of project effectiveness Maintained throughout the project implementation Within 30 days of project effectiveness	PMU of MRD

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MATE	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBILE ENTITY/AUTHORITY
	PMU will allocate timely and adequate budget for effective management of ESHS risks and impacts during project implementation.		
1.2	 ENVIRONMENTAL AND SOCIAL ASSESSMENT During project preparation, update, in a manner acceptable to the Association, the E&S documents: Environmental and Social Management Framework (ESMF), which comprises Resettlement Planning Framework (RPF), Indigenous Peoples Planning Framework (IPPF), Labor Management Procedures (LMP). Stakeholder Engagement Plan (SEP) During project implementation, prepare, consult, adopt and implement, in a manner acceptable to the Association, the E&S document, including: Resettlement Plans (RP), prepared for relevant subprojects Environmental and Social Management Plans (ESMP), for relevant subprojects Indigenous Peoples Plans, prepared for relevant subprojects In case the Crisis and Emergency Response Component (CERC) is activated, MRD will follow the Emergency Response Manual for CERC (to be included in the ESMF). 	Update for consultation during project preparation and prior to the project appraisal Prepare/update and disclose for consultation prior to starting the construction activities and throughout project implementation	PMU of MRD General Department of Resettlement (GDR)

MATE	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBILE ENTITY/AUTHORITY
1.3	MANAGEMENT TOOLS AND INSTRUMENTS Screen proposed rural road and bridge subprojects in accordance with the project's ESMF (which includes also RPF, IPPF, LMP). Thereafter, prepare, consult, adopt and implement the subproject ESMPs (which may include RP and IPP, as required) in a manner acceptable for the Association. Implement diligently the measures and actions identified in the ESCP in accordance with	Update, consult and disclose before the start of respective bidding, during project implementation and maintenance period. Update TK2 ESMP once feasibility	PMU of MRD
	the timeframes specified and review the status of implementation of the ESCP as part of the monitoring and reporting. Notify the Association promptly of any proposed changes to the scope, design, implementation or operation of the project that are likely to cause an adverse change in	study of the bridge is available and detail design is approved. As soon as such proposed changes and associated E&S risks and	
	the environmental or social risks or impacts of the project as well as already approved environmental and social instruments. Carry out, as appropriate, additional assessment and stakeholder engagement in	impacts are identified, and thereafter concurred with the Association for implementation.	
	accordance with the ESSs, and propose changes, for approval by the Association, to the ESCP and relevant management tools, as appropriate, in accordance with the findings of such assessments and consultation. Disclose the updated ESCP.		
	Prepare Terms of Reference (TOR) for consulting services/individuals relevant to ESHS management, including Construction Supervision Consultant, Detailed Design and Implementation Support (DDIS) Consultant, and independent Environmental and Social Monitoring consultant (IESMC). TOR should incorporate requirements set out in ESMF (including RPF, IPPF, LMP) and SEP.		
	Ensure Contractor will prepare, adopt, update Contractor's Environmental and Social Management Plan (C-ESMP) and Contractor's Labor Management Procedures (C-LMP) for PMU's review and approval prior to commencing project construction activities.		
1.4	CRISIS AND EMERGENCY RESPONSE COMPONENT In case CERC is triggered (as agreed between MRD and the Association), MRD will follow procedures as set out in the Emergency Response Manual (part of ESMF)	As soon as CERC is triggered as per agreement of the Association and MRD	

MATE	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBILE ENTITY/AUTHORITY
1.4	MANAGEMENT OF CONTRACTORS		
	Incorporate all relevant E&S requirements set out in project's ESMF, RPF, IPPF, LMP, and SEP, including Grievance Redress Mechanism into the ESHS specifications of the procurement documents and working contracts with Contractors. Selection of contractors: ensure that the contractors are legitimate and reliable entities and are able to comply with the relevant environmental and social requirements of the project. During contract implementation, ensure that contractors comply with the ESHS	During the preparation of the bidding documents, and until signing of respective consultancy, construction and maintenance contracts Throughout implementation of the respective consultancy,	PMU of MRD
	specifications as described in their respective contracts.	construction and maintenance contract	
	PERMIT, CONSENTS AND AUTHORIZATION		
	Obtain or assist in obtaining, as appropriate, the permits, consents, and authorizations from relevant national authorities that may be required to facilitate implementation of project activities.	Throughout Project implementation.	PMU of MRD
	Comply or cause to comply, as appropriate, with the conditions established in these permits, consents, and authorizations of relevant authorities throughout project implementation.	During preparation of bidding documents and before commencement of civil works (e.g.	
	All civil works are subject to screening for UXOs before the start of site clearance, setting- up of contractor's construction camps and start of any construction. The screening for UXOs shall be carried by certified experts.	screening and clearance for UXO).	
ESS 2:	LABOR AND WORKING CONDITIONS		
2.1	LABOR MANAGEMENT PROCEDURES		
	Update the Labor Management Procedures (LMP).	Update and disclose prior to the Project appraisal	PMU of MRD
	Ensure that all requirements set out in the LMP are included in the bidding document to ensure the project will address identified labor related risks, including, but not limited to, training of all workers on a) occupational, health and safety (OHS) measures; b) code of conduct and prevention of sexual abuse and exploitation (SEA), sexual harassment (SH), violence against children (VAC); c) prevention of child and forced labor; d) emergency preparedness and response; e) grievance redress mechanism (GRM) for project workers and SEA/SH survivors; f) training of workers on common Sexually Transmitted Infections (STI) such as HIV/AIDS, and COVID-19 prevention.	Implement throughout the project Implementation	Contractors and Subcontractors

MATE	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBILE ENTITY/AUTHORITY
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain, and operate a grievance mechanism for project workers, as described in the LMP and consistent with ESS2 and ESS4.	Update, adopt and implement no later than ninety (90) days after the Effective Date	PMU of MRD Contractors and Subcontractors
2.3	OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES		
	Update, adopt, and implement occupational, health and safety (OHS) measures as part of project ESMF.	Update, adopt and implement no later than ninety (90) days after the Effective Date	PMU of MRD
	Ensure that contractors' and construction supervision consultants appoint qualified staff to ensure effective implementation of OHS measures.	Throughout project implementation	Contractors and Subcontractors
	Implement training of project workers to raise awareness on COVID-19 and OHS risks and the requirements included in the LMP (including workers' Code of Conduct).		
ESS 3:	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT		
3.1	WASTE MANAGEMENT PLAN		
	Develop, adopt and implement Waste Management Plans, as envisaged by subproject ESMPs under actions 1.2 and 1.3 above. Monitor and supervise the contractors to ensure that the contractors implement/comply with the requirements specified in the construction contracts and subproject	Throughout project implementation, and during rehabilitation/construction works.	Contractors
	ESMP, particularly the Environmental Codes of Practices, the Workers' Codes of Conducts and site-specific mitigation measures related to control of dust and noise, water pollution prevention, solid waste and wastewater management, environmental hazard prevention, etc.		
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: Develop and implement measures for resource efficiency and pollution prevention, as part of ESMF and site specific ESMPs.	Throughout the project implementation.	PMU of MRD
ESS 4:	COMMUNITY HEALTH AND SAFETY		
4.1	TRAFFIC AND ROAD SAFETY		
	Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the subproject ESMPs based in the ESMF developed under action 1.2 and 1.3 above.	Throughout project implementation	Contractors and Subcontractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBILE ENTITY/AUTHORITY
4.2	COMMUNITY HEALTH AND SAFETY		
	Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the communities arising from project activities, including, inter alia, behavior of contractors' workers, risks of labor influx, risk of transmission of non-communicable diseases and communicable disease such as sexually transmitted infections (STI) such as HIV/AIDS due to project activities, response to emergency situations, including measures for prevention and control of COVID-19 as described in subproject ESMPs, in a manner acceptable to the Association.	Throughout project implementation	PMU of MRD Contractors and Subcontractors
	Implement COVID-19 prevention measures in accordance with the updated guidance of the Ministry of Health and the World Bank's interim notes on "COVID-19 Considerations in Construction/Civil Works Projects."		
4.3	SEA, SH, and VAC RISKS	/	
	 Assess risks of SEA/SH/VAC at subproject level and prepare, adopt, and implement a SEA/SH Action Plan as needed for subproject ESMPs in accordance with project's ESMF. Incorporate workers' Code of Conducts on SEA/SH/VAC, including prohibition of SEA/SH/VAC into construction bidding documents and TORs for all consulting services. 	Throughout project implementation	PMU of MRD Contractors and Subcontractors
	 Ensure the contractors provide necessary training to all of their workers on the Code of Conducts on SEA/SH/VAC, and the prohibition of SEA/SH/VAC as to workers. Assess the risks related to SEA/SH/VAC at subproject level, and take necessary measures and action to prevent SEA/SH/VAC as part of C-ESMP and C-LMP. Where necessary, consult with the Association and prepare SEA/SH action plan. Engage qualified institution/NGO to conduct training/awareness raising for subproject community on SEA/SH/VAC. Ensure community members and interested parties at subprojects are aware of the availability of project GRM for SEA/SH and the effort of the project to prevent and address SEA/SH incidences. 		

MATER	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBILE ENTITY/AUTHORITY
5.1	RESETTLEMENT PLANNING FRAMEWORK During project implementation, prepare, consult, adopt, and implement site-specific Resettlement Plan (RP), where needed, in accordance with the project's Resettlement Planning Framework, ESS5, national legislation. Preparation of RP(s) will be aligned also with ESMF and site specific ESIA findings and respective RPs are implemented before carrying out any associated activities, in a manner acceptable to the Association.	RPs for subprojects prepared and disclosed for consultation prior to RP implementation and commencement of construction	MRD PMU of MRD & General Department of Resettlement (GDR) and relevant authorities.
5.2	GRIEVANCE MECHANISM As part of the RPF (specified in Section 5.1 above), a Grievance Redress Mechanism (GRM) has been prepared in project's RPF, summarized in project's SEP, and disclosed during project preparation. During project implementation, project's GRM will be disclosed at subproject level. GRM will be used to address grievances related to land acquisition, voluntary donation, compensation, resettlement and livelihood restoration support that may be submitted by affected people. The MRD will maintain effectively operational GRMs throughout project lifetime – as outlined in the RPF.	Prior to commencing land acquisition and resettlement at subproject level, and throughout subproject implementation	PMU of MRD & General Department of Resettlement (GDR) and relevant authorities at subproject level
	BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL R	ESOURCES	
6.1	BIODIVERSITY RISKS AND IMPACTS: Identify and implement measures to address biodiversity risks and impacts, as part of ESMF and ESMPs once locations are identified. Thereafter monitor and report on the contractor's compliance with ESF requirements.	Throughout subproject implementation	PMU of MRD
	The project will not finance road or bridge improvement that could provide access to critical habitats such as wildlife sanctuary and protected areas, or subproject that may cause deforestation. The ESMF has provided practical guidance for screening of rural road against ineligibility criteria (exclusion criteria), impacts screening check list, and identification and preparation of environmental and social management plans once rural roads and bridges are identified.		
ESS 7: I	NDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITION	AL LOCAL COMMUNITIES	
7.1	INDIGENOUS PEOPLES PLANNING FRAMEWORK Update, consult, adopt, and implement the Indigenous Peoples Planning Framework (IPPF) as well as prepare and implement Indigenous Peoples Plans (IPPs), where required, in accordance with the WB's ESS7, in a manner acceptable to the Association.	Prior to project appraisal during preparation To be applied throughout project implementation for subprojects with IPs present in subproject area	PMU of MRD

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBILE ENTITY/AUTHORITY
7.2	GRIEVANCE MECHANISM Update, consult, adopt, and implement a grievance redress mechanism (GRM) for Indigenous People as required under the IPPF.	Prior to commencement of the Project activities Maintained throughout Project implementation	PMU of MRD
ESS 8:	CULTURAL HERITAGE		
8.1	CHANCE FINDS PROCEDURES Prepare, adopt and implement chance find procedures, as part of project ESMF and ESMPs	Prior to project appraisal for ESMF, and before starting the civil works for ESMPs. The procedure will be implemented throughout the project implementation and maintenance period.	PMU of MRD
ESS 10	: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE		
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Update, adopt and implement the Stakeholder Engagement Plan (SEP) and ensure the SEP remains accessible to vulnerable groups and Indigenous Peoples throughout the life of the project.	Prior to project appraisal. Subject to updating, as needed, during project implementation	PMU of MRD
10.2	PROJECT GRIEVANCE MECHANISM Establish, adopt, ensure effective functioning of all project's GRMs – as detailed in RPF, IPPF, and LMP, and as summarized in project's SEP. In addition to above specific GRMs, to address other grievances, ensure various channels are available for effective receipt of complaints that may arise during project implementation. Ensure PMU's GRM focal point, Contractors' GRM focal points, village heads, local IP leaders, and other existing government channels, for instance, are available and accessible to affected stakeholders for timely and effective resolution of grievances.	Prior to commencement of the Project activities. Implemented throughout Project implementation	PMU of MRD (for GRMs related to land acquisition, and SEA, SH, VAC). Contractors and Subcontractors (for GRM for workers).

MATE	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBILE ENTITY/AUTHORITY
10.3	STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE: Adopt measures, as set out in ESMF, RPF, IPPF, LMP and SEP. Ensure relevant project information is disclosed to potential affected people and interested stakeholders before consultation with them take place. Key project information to be disclosed for consultation should include project purpose, project activities, scope and nature, locations, potential risks and impacts of projects (particularly at subproject level), mitigation measures, and project GRMs. Ensure	Before and during project implementation, particularly prior to implementation at subproject level	PMU of MRD Contractors and subcontractors
	stakeholders are provided with project information timely and ahead of consultation, and the information is accessible through various channels, understandable, and consultation with them is carried out in a manner that is culturally appropriate to them. Consultation should be free of manipulation, interference, coercion, discrimination and intimidation. Ensure consulted people are reported back on questions, concerns, and/or grievance that they may have.		
CAPAC	ITY SUPPORT (TRAINING)		
CS1	Committed to implementing the capacity building activities as outlined the ESMF (Section 7.3.2 – Capacity Building). In line with this, some key trainings, but not limited to, will be provided to, and repeated as necessary: 1. PMU staff at national and provincial level, including implementation support consultants, Social and Environmental Officers of MRD. Review of ESF knowledge and experience will be carried out periodically (at least once a year) to timely address remaining ESF knowledge gaps through repeated and enhanced ESF training. Training topics include key requirements of World Bank's ESF, key requirements set forth ESMF, RPF, IPPF, LMP, SEP, ESHS including OHS, SEA, SH, VAC, STI such as HIV/AIDS, COVID-19, project's GRMs, and lessons learned from other similar road rehabilitation/construction projects. 2. Contractors and subcontractors. Training topics cover key requirements of World Bank's ESF, key requirements set forth ESMF (including RPF, IPPF, LMP), SEP, ESHS as well as OHS, SEA, SH, VAC, HIV/AIDS, COVID-19, and project's GRMs. The ESMP booklet has been developed and applied under the current KH-SEADRM, including good practices on monitoring and reporting from other road projects, could be covered under trainings intended for Contractors.	One month after project effectiveness At least one month before starting the civil works. At least one month before starting the civil works. At least one month before starting civil works and throughout the construction and maintenance period.	E&S consultants engaged by PMU (with technical support from the World Bank) E&S consultants engaged by PMU (with technical support from the World Bank) SEOs of MRD PMU of MRD Contractors

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MATERIA	AL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBILE ENTITY/AUTHORITY
	 Contractors and subcontractors are responsible for providing training to all of their workers on ESHS, Codes of Conduct related to SEA, SH, VAC and GRM for workers as part of C-ESMP and C-LMP Communities: Road and Traffic safety, SEA, SH, VAC, STI, COVID-19, project GRMs. 		