

# REPUBLIC OF CABO VERDE

## Improving Connectivity and Urban Infrastructure Project (P178644)

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

[September, 2023]

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Cabo Verde (the Borrower) shall implement the Project Improving Connectivity and Urban Infrastructure (the Project) with the involvement of the Ministry of Infrastructure, Territorial Planning and Housing (MIOTH), as set out in the Financing Agreement. The International Bank for Reconstruction and Development/International Development Association (the World Bank) has agreed to provide the original financing of the Project (P178644), as set out in the referred agreement(s). This ESCP supersedes previous versions of the ESCP for the PPA of Project.
2. The Borrower shall ensure that the Activities are carried out in accordance with the Environmental and Social Standards (ESSs) of the World Bank and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the World Bank. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that have been developed and/or are to be developed for the Project that shall be adopted under the Activities, all of which shall be subject to prior consultation and disclosure, consistent with ESS10, and in form and substance, and in a manner acceptable to the World Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the World Bank.
4. As agreed by the World Bank and the Borrower, this ESCP will be revised from time to time if necessary, during the implementation of the Activities, to reflect adaptive management of changes and unforeseen circumstances related to the Activities or in response to assessment of performance of the Activities. In such circumstances, the Borrower through the Ministry of Finance, in coordination with MIOTH, and the World Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the World Bank and the Republic of Cabo Verde, through the Minister for Finance. The Borrower shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the World Bank 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&amp;S instruments required under the ESCP, stakeholder engagement activities, and the functioning of the grievance mechanism(s).</p> <p>The Project Operations Manual (POM) shall contain an annex with the minimum content of the report.</p>	Submit quarterly reports to the World Bank throughout the project implementation, starting from the Effective Date, Submit each report to the World Bank on an agreed format, not later than fifteen (15) days after the end of each reporting period. The reporting format will be agreed by First Implementation Support Mission.	<p>Responsibility: MIOTH Environmental and Social Specialists.</p> <p>Accountability: Project Coordinator.</p>

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B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly notify the World Bank of any incident or accident related to or having a direct impact on the Project, or likely to have a significant adverse effect on the environment (including e.g., water pollution, soils contamination, air emissions, flora and fauna disturbances), the affected communities, the general public or workers. Indicative examples: any accident or incident related to cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury.</p> <p>Provide sufficient detail regarding the scope, severity, and possible causes of 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/or supervising firm, as appropriate.</p> <p>Subsequently, at the World Bank's request, a report of the incident or accident shall be prepared and the corresponding measures to prevent its recurrence shall be submitted.</p> <p>The Project Operation Manual (POM) shall contain an annex of the minimum content of the respective accident reports.</p>	<p>1. In case of, accident or incident related to cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, the Borrower notify the World Bank immediately within twenty-four (24) hours.</p> <p>2. For any other incidents or accidents notify the World Bank no later than forty-eight (48) hours after learning of the incident or accident.</p> <p>3. Provide investigation report to the World Bank, within one week.</p> <p>Throughout Project implementation.</p>	<p>Responsibility: MIOTH Environmental and Social Specialists.</p> <p>Accountability: Project Coordinator.</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
C	<p><b>CONTRACTORS MONTHLY REPORTS</b></p> <p>Require contractors and supervising firms to provide monthly reports on the level of compliance with ESSs requirements particularly for civil works.</p> <p>These reports shall ensure that contractors provide details on their oversight of environmental, social, health and safety (ESHS) performance as enshrined in the ESMP, C-ESMP, and LMP. These reports shall be generated from the field by construction site supervisors recruited under the Project and submitted to the Borrower for onward reporting to the World Bank.</p>	<p>Contractor reports to be submitted to the Supervising Engineer on a weekly basis.</p> <p>The Supervising Engineer reports to be submitted to the Borrower on a monthly basis, and the Borrower reports to be submitted to the World Bank on a quarterly basis.</p>	<p>Responsibility: MIOTH Environmental and Social Specialists.</p> <p>Accountability: Project Coordinator.</p>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Maintain the UGPE structure with qualified staff and resources to support the management of E&amp;S risks and impacts of the Project, including: one Environmental Specialist and one Social Specialist; adequate resources shall be allocated to ensure that the planned tasks are carried out effectively.</p> <p>MIOTH shall establish and maintain an Environmental and Social (E&amp;S) Team with suitably qualified and experienced personnel to support the management of E&amp;S risks and impacts of the Project, including the following full-time positions: One Environmental Specialist and one Social Specialist. The Environmental Specialist and the Social Specialist must have experience and qualifications in accordance with terms of reference acceptable to the World Bank and be hired or appointed based on those terms of reference.</p>	<p>The UGPE structure will be strengthened with a Social Specialist no later than three (3) months after Project Approval by the Bank and will be maintained throughout Project implementation.</p> <p>At least one Environmental Specialist and one Social Specialist shall be recruited by MIOTH no later than three (3) months after Project Approval by the Bank. Thereafter maintain these positions throughout Project implementation.</p>	UGPE and MIOTH

1.2	<b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS:</b>		UGPE (preparation of instruments) and MIOH (implementation).
	<ol style="list-style-type: none"> <li>1. Prepare, disclose, consult, and adopt for the Project an Environmental and Social Management Framework (ESMF), a Stakeholder Engagement Plan (SEP), Labor Management Procedures (LPM), and a Resettlement Planning Framework (RPF). The Project ESMF includes a sexual exploitation and abuse/sexual harassment (SEA/SH) risk assessment and Action Plan, and Chance-find procedures.</li> <li>2. For identified project areas, the Borrower shall prepare, disclose, adopt, and implement any environmental and social assessments including Environmental and Social Impact Assessment (ESIA) and/or Environmental and Social Management Plans (ESMP), Health and safety plans (HSP), WHO guidelines on COVID-19, and other relevant Good International Industry Practice (GIIP), all in accordance with the ESSs. The environmental and social assessment will be conducted in accordance with ESS1, and will consider, in an integrated way, all relevant direct, indirect and cumulative environmental and social risks and impacts of the project.</li> <li>3. Cause the contractors to prepare/update/adopt and implement site-specific ESMPs (C-ESMPs) consistent with the relevant ESSs, for the rehabilitation/refurbishment of existing infrastructure, as set out in the ESMF for these subprojects. The C-ESMPs shall include SEA/SH risk mitigation and response measures in line with those included in the ESMF. Proposed activities described in the exclusion list established in the ESMF shall not be eligible to receive funding under the Project.</li> <li>4. The Borrower shall identify EHSS requirements relevant to the subprojects and to any Associated Facilities in a manner proportionate to its control and assess and manage ESHS risks and impacts of subprojects in accordance with ESSs and ESMF prepared for the project in a manner acceptable to the World Bank.</li> <li>5. For subprojects with anticipated physical and/or economic displacement impacts, the Borrower shall prepare, consult, disclose, adopt, and implement Resettlement Plans for the relevant areas in accordance with ESS5.</li> </ol>	<ol style="list-style-type: none"> <li>1. The project SEP, ESMF, LMP and RPF are prepared and disclosed by Appraisal and will be adopted and implemented throughout Project implementation.</li> <li>2. Any subsequent ESIA/ESMPs shall be prepared, disclosed, adopted prior to the launch of corresponding civil works. Once adopted, implement the site-specific ESIA and ESMPs throughout Project implementation.</li> <li>3. Cause the contractors to adopt the C-ESMPs before the commencement of any works and thereafter implement them throughout Project implementation.</li> <li>4. Resettlement Plans (RPs) shall be developed, consulted, disclosed, adopted, and implemented for the relevant subprojects before the commencement of civil</li> </ol>	

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		works.	
1.3	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&amp;S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p>	<p>As part of preparation of procurement documents and prior to call for bids.</p> <p>Supervise contractors throughout project implementation.</p>	<p>Responsibility: MIOTH Environmental and Social Specialists.</p> <p>Accountability: Project Coordinator.</p>
1.4	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project, including, inter alia, the preparation of all ESF instruments are carried out in accordance with terms of reference acceptable to the World Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	UGPE Environmental and Social Specialists.
1.5	<p><b>CONTINGENT EMERGENCY RESPONSE FINANCING</b></p> <p>a) Ensure that the CERC-ESMF addendum includes a description of the ESHS assessment and management arrangements for the implementation of the CERC component, in accordance with the ESSs.</p> <p>b) Adopt any environmental and social (E&amp;S) instruments which may be required for activities under CERC component of the Project, in accordance with the CERC-ESMF addendum and the ESSs, and thereafter implement the measures and actions required under said E&amp;S instruments, within the timeframes specified in said E&amp;S instruments.</p>	<p>a) Prior to the start of design/civil works under CERC and maintained throughout Project implementation.</p> <p>b) Adopt any required E&amp;S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&amp;S instrument is required.</p>	MIOTH Environmental and Social Specialists.

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		Implement the E&S instruments in accordance with their terms, throughout Project implementation.	



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<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>The Borrower, through UGPE, shall prepare, consult, adopt, disclose and implement Labor Management Procedures (LMP), that comply with applicable national legislation and ESS 2, for the Project and sub-projects, including through, inter alia, occupational, health and safety measures (including personal protective equipment, and emergency preparedness and response measures), setting out grievance mechanisms for Project workers, the recruitment and project management process.</p> <p>The preparation of Labor Management Plans in compliance with the Labor Management Procedures will be included in the ESHS specifications of the procurement documents and contracts with contractors and supervising engineers.</p> <p>The Supervising Engineers will supervise the implementation of the CESMPs and COHSPs and will have in their teams Environmental Specialists with relevant qualifications and experience in Health and Safety management of construction works, as well as experienced Social Specialists.</p> <p>During the implementation, the Borrower provides project's workers the following measures:</p> <ul style="list-style-type: none"> <li>• Provide workers with information and documentation that is clear and understandable regarding their terms and conditions of employment through written contracts setting out their rights, including, inter alia, rights related to hours of work, wages, overtime, compensation and benefits, as well as written notice of termination of employment, and details of severance payments, as applicable;</li> <li>• Implement occupational health and safety (including personal protective equipment, and emergency preparedness and response) measures, taking into account the General Environmental, Health and Safety Guidelines (EHSGs), and other relevant Good International Industry Practice (GIIP) and, as appropriate, the industry-specific EHSGs and other Good International Industry Practice (GIIP);</li> <li>• Implement measures, as applicable, to, inter alia: (i) prevent the use of all forms of forced labor and child labor; (ii) enable workers to benefit from, inter alia, access to grievance and redress mechanisms without fear of retaliation; and effective freedom to form and join workers organizations or alternative mechanisms for expressing their concerns and protect their rights related to labor and working conditions;</li> <li>• Develop a code of conduct for workers, which shall include measures to prevent and respond to SEA/SH cases;</li> <li>• Incorporate the relevant requirements above in the ESHS specifications of the procurement documents and contracts with third parties that engage workers in the implementation of the Activities.</li> </ul> <p>UGPE to prepare a MoU with the Labor General Inspectorate (Inspeção Geral do Trabalho – IGT) for the institutional Support during the implementation of the Project</p>	<p>LMP is prepared and disclosed before appraisal and shall be adopted and implemented by Effective Date and throughout Project implementation. MoU with IGT to be signed before the start of implementation (works).</p>	<p>UGPE (preparation – disclosure of LMP). MoU with IGT</p> <p>MIOTH (through ECV and ICV) – implementation, with the institutional support of Labor General Inspectorate and the appointment of Supervising Engineers.</p>

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2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <ol style="list-style-type: none"> <li>1. Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2, including procedures to report SEA/SH incidents in an ethical and confidential manner, following a survivor-centered approach.</li> <li>2. Include the grievance mechanism as a part of the procurement documents for the supervising firms and the contractors, with stipulations that they include similar provisions in agreements with their subcontractors before the start of Project works.</li> <li>3. Disseminate and explain the grievance mechanism for Project workers to contractors' workers.</li> </ol>	<ol style="list-style-type: none"> <li>1. Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.</li> <li>2. Before launching the procurement processes.</li> <li>3. Information about GM shall be disseminated to project workers prior to the commencement of works and throughout Project implementation.</li> </ol>	UGPE, in coordination with the MIOTH Environmental and Social Specialists and implementation by Project contractors.

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2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <ol style="list-style-type: none"> <li>1. Incorporate relevant OHS measures, in procurement documents and contracts for all consulting firms, service providers, contractors, and supervision firms.</li> <li>2. Develop and include in the site-specific ESIAs/ESMPs a detailed Occupational Health and Safety Management Plan (OHSMP) consistent with national regulations, Good International Industry Practices (GIIP) and the World Bank Group General Environmental, Health and Safety Guidelines (EHSG).</li> <li>3. Cause contractors to develop and include in the C-ESMPs a detailed OHSMP consistent with national regulations, GIIP and the World Bank Group General EHSG.</li> </ol>	<ol style="list-style-type: none"> <li>1. Prior to launching the procurement processes and signing contracts.</li> <li>2. Any subsequent ESIA/ESMP shall be prepared, disclosed, adopted and implemented prior to the launch of corresponding civil works. Once adopted, implement the site-specific ESIAs and ESMPs throughout Project implementation.</li> <li>3. Cause the contractors to adopt the C-ESMPs before the commencement of any works and thereafter implement them throughout Project implementation.</li> </ol>	MIOTH (through ICV and ECV) and the implementation by project contractors.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 3 RESOURCE EFFICIENCY, POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>WASTE AND HAZARDOUS MATERIALS MANAGEMENT:</b></p> <p>Incorporate appropriate waste management measures in the ESMF to manage hazardous and non-hazardous wastes, consistent with ESS3.</p> <p>The Borrower shall ensure that the project contractors develop and implement to the waste and hazardous materials (such as hydrocarbons, oil filters, etc.), a waste management plan, commonly as part of the ESIA and/or ESMP, where relevant, to manage risks in a manner acceptable to the World Bank.</p> <p>The Borrower shall ensure adoption of climate co-benefits, energy and water efficiency measures consistent with ESS3, as guided in the ESMF, and as per the national law, guidelines and policies and ensure proper disposal of construction waste. These measures will be incorporated, where applicable, into the design of each Project activity as applicable, and implemented through the ESMPs.</p> <p>For all subproject activities, assess impacts (through ESIA) from waste generation (including hazardous waste), pollution emissions and discharges, including GHG emissions where likely to be significant, and prepare and implement proportionate mitigation measures through ESMPs.</p>	<p>Prior to the start of the works and maintained during the implementation of the project.</p> <p>Climate co-benefits, energy and water efficiency measures will be carried out throughout the Project implementation.</p>	UGPE MIOTH (through ECV and ICV) / Contractors Supervising Engineers
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.2 above.</p>	Any subsequent ESIA/ESMP shall be prepared, disclosed, adopted prior to the launch of corresponding civil works. Once adopted, implement the site-specific ESIAs and ESMPs throughout Project implementation	UGPE MIOTH (through ECV and ICV) / Contractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 4 : COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>ROAD SAFETY AND TRAFFIC:</b></p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.2 above.</p> <p>The Borrower, through ECV and ICV, shall ensure that the project contractors develop and implement road safety plans, in particular a traffic plan for construction equipment (if required).</p> <p>UGPE shall ensure that the project contractors implement properly prepared and marked access routes to the shipyards.</p>	Prior to the start of civil works and maintained throughout implementation of the Project.	UGPE MIOTH (through ECV and ICV)/ Contractors Supervising Engineers
4.2	<p><b>COMMUNITY HEALTH AND SAFETY:</b></p> <p>The Borrower, through ECV and ICV, shall ensure that project contractors develop and implement measures and actions to assess and manage specific risks and impacts to the community arising from project activities, including those related to the presence of project workers and any risks related to labor recruitment as required in the ESMF in actions 1.2 above.</p>	In the execution phase of the works and maintained throughout the implementation of the Project.	MIOTH (through ECV and ICV)/ Contractors Supervising Engineers

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4.3	<p><b>GBV AND SEA/SH RISKS:</b></p> <p>A Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) risk assessment has been conducted for the project. The SEA/SH Action Plan including measures to manage those risks shall be prepared, adopted, and implemented. It shall contain a set of measures to increase accountability, prevent and mitigate the risk of SEA/SH, including but not limited to developing codes of conduct for workers and promoting SEA/SH awareness training for project workers and other stakeholders.</p>	<p>SEA/SH risk assessment has been conducted as part of the ESMF. It will be disclosed by Appraisal, adopted, and implemented throughout Project implementation.</p> <p>The SEA/SH Action shall be completed no later than two (2) months after Project Approval by the Bank, and thereafter implemented throughout Project implementation.</p> <p>Codes of conduct signed by workers and training shall be provided prior to the commencement of project activities.</p>	<p>UGPE ICIEG and IGT Contractors MIOTH (ECV and ICV)/ Contractors Supervising Engineers</p>
<b>ESS 5: LAND ACQUISITION, LAND USE RESTRICTIONS AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<p><b>RESETTLEMENT PLANNING FRAMEWORK</b></p> <p>Prepare, disclose, consult and adopt for the Project a Resettlement Planning Framework (RPF) in accordance with ESS5 and relevant national legislation.</p>	<p>The Project RPF will be disclosed by Appraisal and be adopted and implemented throughout Project implementation.</p>	<p>UGPE (preparation of RPF).</p> <p>Implementation: MIOTH with the involvement of ECV, ICV, and DGPCP.</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
5.2	<p><b>RESETTLEMENT PLANS</b></p> <p>For identified project sites, prepare, disclose, adopt, and implement resettlement plans (RPs) consistent with ESS5, in accordance with information and template included in the RPF if required and in a manner acceptable to the World Bank.</p> <p>The General Directorate of Heritage and Public Procurement (Direcção-Geral do Património e Contratação Pública – DGPCP) is formally the governmental institution with the responsibility to conduct the land acquisition processes for projects of public interest under the national legal requirements and shall be involved in any processes relating to land acquisition while MIOH shall remain responsible for implementation.</p>	<p>For subprojects where physical and/or economic displacement impacts are expected, Resettlement Plans shall be prepared and implemented prior to the launch of civil works.</p> <p>The RP (s) shall be adopted and implemented, including ensuring that before taking possession of the land and related assets, full compensation has been provided and [as applicable] displaced people have been compensated and/or resettled with moving and/or subsistence allowances provided.</p>	<p>UGPE (preparation of Resettlement Plans)</p> <p>Implementation: MIOH with the involvement of ECV, ICV, and DGPCP.</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 6: CONSERVATION OF BIODIVERSITY AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p><b>SUSTAINABLE MANAGEMENT OF BIOLOGICAL NATURAL RESOURCES:</b></p> <p>The Borrower shall ensure sustainable management of biological natural resources through good management practices and the use of available technological tools.</p>	In the execution phase of the works and maintained throughout Project implementation.	<p>MIOTH (ECV and ICV) / Contractors Supervising Engineers</p> <p>Ministry of Agriculture and Environment / National Environment Directorate (DNA)</p>
6.2	<p><b>PROTECTED AREAS/BIODIVERSITY CONSERVATION:</b></p> <p>The Borrower shall assess the subprojects' risks and impacts on biodiversity and implement biodiversity management plan as part of subprojects ESMPs.</p> <p>a. Apply the ESMF and measures to screen subproject site and to exclude activities in protected areas.</p> <p>b. Biodiversity risk and impact assessments will be conducted as part of each of the project's Environmental and Social Assessments and measures to manage these risks will be included in the ESIAs/ESMPs. These ESIAs/ESMPs will include mitigation measures taking into account the principle of the mitigation hierarchy, as defined in paragraph 27 of the ESS 1 of the ESF.</p>	<p>The project ESMF will be prepared and disclosed by Appraisal and be adopted and implemented throughout Project implementation.</p> <p>These management procedures shall be systematically included in the ESIAs/ESMPs and in the Contractors contracts.</p>	<p>UGPE (preparation of ESMF)</p> <p>Implementation: MIOTH (ECV and ICV) / Contractors Supervising Engineers</p> <p>Ministry of Agriculture and Environment / DNA</p>



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<b>ESS 8 : CULTURAL HERITAGE</b>			
8.1	<p><b>CHANCE FINDS :</b></p> <p>The Borrower, through UGPE, shall describe a chance find procedures in the project's ESMF, to be implemented by MIOTH (ECV and ICV).</p> <p>The ESMF, through the subproject screening process, shall ensure that any sites with or near cultural heritage are identified and any necessary measures taken. Chance find procedures clauses shall be included in all work contracts in case any cultural heritage is unexpectedly found.</p>	Throughout Project implementation.	<p>UGPE (preparation of the ESMF)</p> <p>Implementation: MIOTH (ECV and ICV) / Contractors Supervising Engineers / Ministry of Culture and Creative Industries / Cultural Heritage Institute</p>
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b></p> <p><b>PREPARATION AND IMPLEMENTATION OF THE STAKEHOLDER ENGAGEMENT PLAN:</b></p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, <i>inter alia</i>, 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.</p>	The SEP will be disclosed by Appraisal and will be adopted and implemented throughout Project implementation.	<p>UGPE (preparation of the SEP).</p> <p>MIOTH (implementation).</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>Establish, publicize, maintain, and operate an accessible 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>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH grievances, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	Adapt the GM used by UGPE for other World Bank-financed projects to the Project, adopt by Effectiveness Date, and maintain it throughout Project implementation.	UGPE in coordination with MIOTH.

#### CAPACITY BUILDING

Activities	Beneficiary	Program
<b>CB1 Training Module - WB ESF and ESS</b>	Project Staff based in UGPE (ESS, M&E-S, Procurement, financial), MIOTH (ICV and ECV) DNA and DGPCP staff.	1st quarter of the 1st year of implementation
<b>CB2 Training Module - Environmental and Social</b> , design and implementation of a training module on the following aspects: <ul style="list-style-type: none"> <li>➤ Screening instrument for sub-projects selection process (environmental and social checklist);</li> <li>➤ National environmental policies, procedures and legislation;</li> <li>➤ Knowledge of the process for monitoring the implementation of the ESMP and RPF.</li> </ul>	Project Staff based in UGPE (ESS, M&E-S, Procurement, financial), MIOTH (ICV and ECV) DNA a staff. Non-governmental organizations (NGOs) Community based World Banks.	1st quarter of the 1st year of implementation
<b>CB3 Training Module - Occupational Health and Safety:</b> <ul style="list-style-type: none"> <li>➤ Individual and collective protective equipment;</li> <li>➤ Risk management in the workplace;</li> <li>➤ Prevention of work-related accidents;</li> <li>➤ Health and safety rules;</li> <li>➤ Solid and liquid waste management;</li> <li>➤ Emergency preparedness and response.</li> </ul>	Project staff based in UGPE, ICV and ECV Contractors staff. Supervising engineer staff	Beginning of the work

<b>CB4 Training module - Working conditions:</b> <ul style="list-style-type: none"> <li>➤ Work conditions in accordance with the national laws and regulations in force;</li> <li>➤ Code of conduct for employers and contracted staff.</li> <li>➤ GRM for workers – grievance submission and redress procedures</li> </ul>	Project staff based in UGPE, ICV and ECV Contractors staff. Supervising engineers staff	Beginning of the work
<b>CB5 Training Module – Grievance Mechanism:</b> design and production of a training module covering the following aspects: <ul style="list-style-type: none"> <li>➤ Classification of complaints;</li> <li>➤ Registration and grievance redress procedures;</li> <li>➤ Recording, documentation and handling of grievances;</li> <li>➤ Allocation of rules and responsibilities of the GRM organizational structures;</li> <li>➤ Level of processing, types of authorities and affiliation.</li> </ul>	Project Staff in UGPE, ICV and ECV Municipalities staff Non-governmental organizations (NGOs) Community based World Banks Community leadership.	1 <sup>st</sup> quarter of the 1st year of implementation
<b>CB6 Training module - GBV/SEA/SH risk module:</b> Awareness raising and measures to prevent and mitigate GBV/SEA/SH risks: <ul style="list-style-type: none"> <li>➤ Prevention and response to GBV/SEA/SH based on Cabo Verdean laws and regulations</li> <li>➤ Survivors Services provider;</li> <li>➤ GBV/SEA/SH complaint management</li> <li>➤ Themes, activities and target groups shall be developed in the GBV action plan.</li> </ul>	Project Staff in UGPE, ICV and ECV Municipalities staff Civil society, Non-governmental organizations (NGOs) Community based World Banks, including Women’s World Banks Community leadership Contractors staff Supervising engineers staff	Before the start of the project activities. Starts in 1 <sup>st</sup> quarter of the 1st year of implementation, and continues throughout project implementation with annual refresher courses.
<b>CB7 Training module - ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</b>	Project Staff based in UGPE, ICV, ECV and DGPCP Design / ESIA consultants	Before the start of the project activities and whenever new design / ESIA consultants are appointed