



Republic of Mozambique

**Mozambique Digital Acceleration Project
(P176459)**

Draft

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

March 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Mozambique (GoM) is planning to implement the Mozambique Digital Acceleration Project (MDAP, P176459), herein referred to as Project, under the leadership of the Ministry of Transport and Communications (MTC), with involvement of both the (i) Ministry of Science, Technology and High Education (MCTES) and (ii) Ministry of Education and Human Development (MINEDH), and key technical support from (i) the National Communications Institute of Mozambique (INCM)/Universal Access Service Fund (FSAU) in collaboration with National Directorate of Communications (DNC), and (ii) the National Information and Communications Technology Institute (INTIC) and (iii) the National Institute of Electronic Government (INAGE). The Project Implementation Unit (PIU) will be the same under the Southern Africa Trade and Connectivity Project, already established at the MTC. To the staff of the existing PIU will be included experts in some specific areas including Telecoms sector issues. Once the Project becomes effective, the short-term consultants (be them individuals or firm) will also be hired depending on the project needs to support its successful implementation. The International Development Association (IDA) has agreed to provide financing for the Project.
2. The GoM (also referred to as 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 Grant Agreement and the Project Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreements.
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, 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 shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through the Ministry of Transport and Communications and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient Through the Minister of the Ministry of Transport and Communications. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>The Recipient shall 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 instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism.</p>	<p>Submit six monthly reports to the Association throughout Project implementation.</p> <p>Submit each report to the Association no later than 15 days after the end of each reporting period.</p>	<p><i>MTC PIU – Environmental and Social Specialists</i></p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>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, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury, water course pollution, soils contamination, air emissions, protected areas disturbances. 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 Association’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association</p>	<p>MTC PIU coordinator</p>
C	<p>CONTRACTORS’ MONTHLY REPORTS</p> <p>All contractors and supervising firms shall be required to provide monthly monitoring reports on environmental, social, health and safety (ESHS) performance in accordance with the metrics specified in the respective bidding documents and contracts, and submit such reports to the Association.</p> <p>This report will ensure that contractors provide details on their oversight on environmental, social, health and safety (ESHS) performance as enshrined in the Environmental and Social Management Framework (ESMF), Environmental and Social Management Plan (ESMP), Construction Environmental Social Management Plans (C_ESMP), Resettlement Policy Framework (RPF), Resettlement Action Plan (RAP), Stakeholders Engagement Plan (SEP), GBV Action Plan, Labour Management Procedure (LMP) and other applicable E&S instruments.</p>	<p>Submit the monthly reports to the Association as annexes to the reports to be submitted under action A above.</p>	<p>MTC PIU coordinator</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>D</p> <p>NOTIFICATIONS RELATING TO DAAB COMPLIANCE REVIEW OF CONTRACTOR COMPLIANCE WITH SEA/SH PREVENTION AND RESPONSE OBLIGATIONS</p> <p>Notify the Association of any referral submitted to the Dispute Avoidance and Adjudication Board (DAAB) to initiate a process of compliance review in relation to a contractor’s obligations to prevent and respond to sexual exploitation and abuse (SEA), and/or sexual harassment (SH) specified in the respective works contract with such contractor; and, in the event of any such referral, notify the Association of: (i) the DAAB’s decision on such referral; (ii) the contractor’s Notice of Dissatisfaction, if any, with such DAAB decision; (iii) any notification received on the commencement of an emergency arbitration proceeding or full arbitration proceeding in relation to the DAAB’s decision; and (iv) the resulting emergency arbitration order and/or full arbitration order, if any.</p>	<p>No later than 7 days after the issuance or receipt, as applicable, of the relevant document (i.e., referral to the DAAB, issuance of DAAB decision, Notice of Dissatisfaction, notice of commencement of emergency/full arbitration, emergency/full arbitration order, as applicable).</p>	<p>MTC PIU coordinator</p>
<p>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</p>		
<p>1.1</p> <p>ORGANIZATIONAL STRUCTURE</p> <p>The leading Implementing institution (MTC) has already an established PIU, which in this project is required to be Maintained with qualified staff and appropriate resources to support management of ESHS risks and impacts of the Project including an environmental specialist, a social specialist with Gender, GBV/SEA/SH skills. Maintain and reinforce, throughout Project implementation, an organizational structure to support environmental and social risk management.</p>	<p>Maintain the existing PIU as set out in the MoU; Hire or appoint the environmental and social specialists no later than 90 days after Project approval, and thereafter maintain these positions throughout Project implementation.</p>	<p>MTC</p>
<p>1.2</p> <p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>1. Adopt and implement an Environmental and Social Impact Assessment (ESIA), and corresponding ESMP for potential adverse risks and impacts from civil works under Component 1 - to extend the reach and coverage of broadband networks in rural areas and investment in infrastructure upgrades or construction in new greenfield sites and under Component 2-to establish a fibre backbone or link to serve the government and service delivery institutions, for the Project, consistent with the relevant ESSs.</p> <p>2. Adopt and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p>	<p>1. Adopt the ESIA and ESMP before engaging contractors, and thereafter implement the ESIA and ESMP throughout Project implementation.</p> <p>2. Adopt the ESMF Project approval, and thereafter implement the ESMF throughout Project implementation.</p> <p>3. Adopt the ESMP before launching the</p>	<p>MTC PIU</p> <p>MTC PIU</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>3. Civil works under Component 1 - to extend the reach and coverage of broadband networks in rural areas and investment in infrastructure upgrades or construction in new greenfield sites and under Component 2 - to establish a fibre backbone or link to serve the government and service delivery institutions will require that the recipient adopt and implement for related subprojects site-specific ESIA, ESMP, and C-ESMPS as set out in the ESMF. The proposed activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</p>	<p>bidding process for the respective subproject and prior to the carrying out of subproject that requires the adoption of such ESMP. Once adopted, implement the respective ESMP throughout Project implementation.</p>	<p>MTC PIU – Environmental and social specialists</p>
<p>1.3 MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments (ESMF, RPF, SEP, LMP, RAP, ESIA, ESMPs), Occupational and Health Safety Plan (OHSP), GBV / SEA/SH Action plan 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 with and cause subcontractors to comply with the ESHS specifications of their respective contracts. Contractor’s Management Procedures and requirements will include without limitation:</p> <ul style="list-style-type: none"> ○ Codes of conduct on GBV and OHS matters are required to be adopted by contractors and subcontractors and their workers, which should sign them. ○ Incorporate and implement specific actions in line with the Project GBV Action Plan as part of ESMPs ○ Preparation of a detailed contractor ESMP (C-ESMP) and Community Health and Safety Management Plan - CHSMP, consistent with all project E&S instruments, that is costed, with sufficient budget and staff to mitigate E&S risks; ○ Contractor and subcontractor training plan; ○ Reporting and monitoring arrangements and requirements to verify contractor commitment and compliance; ○ Providing grievance redress mechanisms for contractor and subcontractor, communities and other stakeholders; ○ Contractor to develop a grievance mechanism to handle concerns of their employees especially laborers; ○ Prepare and implement a specific Labor Management Plan for the contractor consistent with the Project’s Labor Management Procedure and the local legislation. ○ Community Health and Safety Management Plan - CHSMP 	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation</p>	<p>MTC PIU – Procurement specialist and Environmental and social specialists</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project, including, inter alia, Environmental and Social Impact Assessment, Environmental and Social Management Plans, Resettlement Action Plans are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	MTC- PIU- Project Coordinator
1.5	<p>CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING</p> <p>N/A</p>		
1.6	<p>ASSOCIATED FACILITIES</p> <p>N/A</p>	N/A	
1.7	<p>ACTIVITIES SUBJECT TO RETROACTIVE FINANCING</p> <p>N/A</p>	N/A	
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	Adopt the LMP prior to Project activities commencement, and thereafter implement the LMP throughout Project implementation.	MTC- PIU- Project Coordinator
2.2	<p>GRIEVANCE REDRESS MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance redress mechanism (GRM) for Project workers, as described in the LMP and consistent with ESS2 and Mozambican labor law.</p>	Establish GRM prior engaging Project workers and thereafter maintain and operate it throughout Project implementation	MTC- PIU- Project Coordinator
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT [
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Adopt and implement a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes, consistent with ESS3.</p>	Adopt the WMP prior to commencement of Project Activities, and thereafter implement the WMP throughout Project implementation].	MTC- PIU- Environmental specialist

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.2 above.</p>	Adopt ESMP before engaging contractors, and thereafter implement the ESIA and ESMP throughout Project implementation.	MTC- PIU- Environmental specialist
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</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>	Adopt ESMP before engaging contractors, and thereafter implement the ESIA and ESMP throughout Project implementation.	MTC- PIU- Environmental and Social specialists
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers, risks of labor influx, response to emergency situations, COVID-19, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.</p> <p>Contractors will develop a detailed site-specific road safety management plan as part of the Community Health and Safety Management Plan - CHSMP to address the impacts on local communities of moving construction equipment and traffic.</p>	Same timeframe as for the adoption and implementation of the ESMPs	MTC- PIU- Environmental and Social specialists
4.3	<p>SEA AND SH RISKS</p> <p>Adopt and implement a SEA/SH Action Plan as part of the ESMF, to assess and manage the risks of SEA and SH.</p>	Adopt the SEA/SH Action prior engaging Project workers, and thereafter implement the SEA/SH Action Plan throughout Project implementation].	MTC- PIU- Environmental and Social specialists
4.4	<p>SECURITY MANAGEMENT</p> <p>Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, as set out in the Security Management Plan, guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.</p>	Prior to engaging security personnel and thereafter implemented throughout Project implementation].	MTC- PIU- Coordinator
4.5	<p>INVOLVEMENT OF THE MILITARY</p> <p>Ensure the following measures are carried out before deploying the Republic of Mozambique's Defense Force in the implementation of Project activities for the provision of security to Project workers, sites and/or assets, consistent with the ESSs:</p> <p>a. Assess and implement measures to manage the security risks of engaging the</p>	[Indicate timeframe, Carry out a), b), c), and d) before deploying NDFM under the Project and implement throughout Project implementation].	MTC

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>National Defense Force of Mozambique (NDFM) as set out in the Security Management Plan, guided by the principles of proportionality and GIIP, and by applicable law, in relation to screening, hiring, rules of conduct, training, equipping, and monitoring of such NDFM;</p> <p>b. Adopt and implement standards, protocols, and codes of conduct for the selection and assignment of NDFM to the Project, and screen such NDFM to verify that they have not engaged in past unlawful or abusive behavior, including sexual exploitation and abuse (SEA), sexual harassment (SH) or excessive use of force;</p> <p>c. Enter into a memorandum of understanding (MoU), with the Ministry of Defense, setting out the arrangements for the engagement of the NDFM in the Project, including the relevant actions and measures set out in this ESCP;</p> <p>d. Provide adequate instruction and training to the NDFM, prior to deployment and on a regular basis, on the use of force and appropriate conduct (including in relation to civilian-military engagement, SEA and SH, and other relevant areas) as set out in the Security Management Plan;</p> <p>e. Ensure that the stakeholder engagement activities under the Stakeholder Engagement Plan (SEP) include communication on the involvement of NDFM in the Project;</p> <p>f. Ensure that any concerns or grievances regarding the conduct of NDFM are received, monitored, and documented (taking into account the need to protect confidentiality) by the Project’s grievance mechanism (see action 10.2 below), which shall facilitate its resolution, in accordance with ESS4 and ESS10. Notify the Association after receiving the concern or grievance, as set out under action B above; and</p> <p>g. Where the Association so request in writing, after consultation with the Recipient: (i) promptly appoint a third- party monitor consultant, with terms of reference, qualifications and experience acceptable to the Association, to visit and monitor the Project area where NDFM are deployed, collect relevant data and communicate with Project stakeholders and beneficiaries; (ii) require the third-party monitor consultant to prepare and submit monitoring reports, which shall be promptly made available to and discussed with the Association; and (iii) promptly take any actions,</p>	<p>e) and f) as set out under actions 10.1 and 10.2 respectively. Notify the Association after receiving the concern or grievance in the timeframe specified in action B above.</p> <p>[g] within the timeframes requested by the Association.</p>	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	as may be requested by the Association upon its review of the third-party monitor consultant reports.		
4.6	DAM SAFETY (FOR ANNEX A, PARA. 2. ESS4) N/A	N/A	
4.7	DAM SAFETY (FOR ANNEX A, PARA. 5. ESS4) N/A	N/A	
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT POLICY FRAMEWORK Adopt and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.	Adopt RPF prior to Project Approval, and thereafter implement the RPF throughout Project implementation.	MTC- PIU- Coordinator
5.2	RESETTLEMENT PLANS Adopt and implement a resettlement action plan (RAP), Livelihood Restoration Plans (LRP) or Process Framework (PF) for each activity under the Project for which the RPF requires such RAP and consistent with ESS5.	Adopt and implement the respective RAP, including ensuring that before getting land use right and related assets, full compensation has been provided and displaced people have been resettled and moving allowances have been provided.	MTC- PIU- Social Specialist
5.3	GRIEVANCE MECHANISM Adopt and implement a grievance mechanism (GM) to address resettlement related complaints as set out in the RPF, RAPs and SEP and consistent with ESS5.	Adopt GM in the RPF prior to Project Approval, and thereafter implement the GM throughout Project implementation.	MTC- PIU- Social Specialist
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Adopt and implement a Biodiversity Management Plan (BMP) as part of the ESMP, in accordance with the guidelines of the specific ESIA's to be prepared for the Project, and consistent with ESS6.	Adopt the BMP prior to engagement of contractor, and thereafter implement the BMP throughout Project implementation.]	MTC- PIU- Environmental Specialist
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES [See examples of possible actions below that can be used if determined that ESS7 is relevant, as set out in paragraph 54 of the E&S Policy and paragraphs 8-10 of ESS7].			
7.1	INDIGENOUS PEOPLES PLANNING FRAMEWORK N/A	N/A	
7.2	INDIGENOUS PEOPLES PLAN		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	N/A	N/A	
7.3	GRIEVANCE MECHANISM N/A	N/A	
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Adopt and implement a Cultural Heritage Management Plan (CHMP) where required as part of ESMP, in accordance with the guidelines of the ESIA prepared for the Project, and consistent with ESS8.	Adopt the CHMP prior to contractor engagement, and thereafter implement the CHMP throughout Project implementation	MTC- PIU- Social Specialist
8.2	CHANCE FINDS Describe and implement the chance finds procedures, as part of the ESMF of the Project in according to Mozambican law and develop site-specific ESMFs for the case in which valuable artefacts or culturally valuable materials are found during project implementation phases.	Describe the chance find procedures in the ESMF. Implement the procedures throughout Project implementation].	MTC- PIU- Social Specialist
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
9.1	ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS) N/A	N/A	
9.2	EXCLUSIONS N/A	N/A	
9.3	FI ORGANIZATIONAL CAPACITY N/A].	N/A	
9.4	SENIOR MANAGEMENT REPRESENTATIVE N/A	N/A	
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Adopt and implement a Stakeholder Engagement Plan (SEP) 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.	Adopt the SEP prior to Project Approval, and thereafter implement the SEP throughout Project implementation.	MTC
10.2	PROJECT GRIEVANCE MECHANISM 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.	Establish the grievance mechanism prior to Project approval, and thereafter maintain and operate the mechanism throughout Project implementation.	MTC- PIU

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>		
CAPACITY SUPPORT		
<p>CS1</p> <p>PROJECT WORKERS TRAINING</p> <p>Training required for PIU staff, Project workers designed to improve awareness of E&S and O&Risks and to mitigate impacts on local communities such as:</p> <ul style="list-style-type: none"> • Environmental and Social Management Framework • Stakeholder Engagement Plan (SEP) • Subprojects Environmental and Social Screening • GBV (/SEA/SH) Risk Mitigation; • Grievance Management, including proper handling of GBV/SEA/SH cases; • Environmental and Socials Reporting and Monitoring requirements; • Labor management procedures – LMP • COVID-19 Protocol and Mitigation Measures • Workplace risk management. • Cultural heritage Chance finding procedure, • Community Health and Safety Plan, and • Road traffic Guidelines • E&s code of conduct and other relevant instruments 	<p>Not later than 120 days of the Effective Date and periodically with the addition of new Project team members join the Project throughout implementation</p>	<p>MTC-PIU through TA, contractors</p>
<p>CS2</p> <p>TRAINING FOR THE COMMUNITY:</p> <p>The PIUs or third parties will conduct trainings for the community designed to raise awareness of environmental and social risks and impacts and mitigation measures including trainings on:</p> <ul style="list-style-type: none"> • Stakeholders Engagement Plan • GBV/SEA/SH awareness and prevention • Communicable diseases/HIV-AIDS/STI/COVID-19/ • Community grievance redress mechanism (GRM) as described in the SEP/ ESMF • Road Safety Awareness • Labor management procedure including local hiring, • Safety around construction and new infrastructure and emergency procedures. • Emergency preparedness and response 	<p>Not later than 120 days of the Effective Date and periodically with the addition of new communities become part of the Project throughout implementation</p>	<p>MTC- PIU- Environmental and Social specialists, TU, contractors</p>

