

# UNION OF THE COMOROS

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## Ministry of Energy, Water and Hydrocarbons

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SONELEC

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### Comoros Solar Energy Access Project (CSEA) - P177646

### Environmental and Social Commitment Plan ESCP

Updated version

March 2025

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Union of the Comoros (the Recipient) is implementing the Comoros Solar Energy Access Project (CSEA) (the Project) with the involvement of the Ministry of Energy, Water and Hydrocarbons (MEEH through a Project Coordination Unit (MEEH PCU)), Ministry of Finance, Budget and Banking (MFBB), SONELEC through a Project Implementation Unit (SONELEC PIU), as set out in the Original Financing Agreement and the Additional Financing Agreement (together the Agreements). The International Development Association (the Association) has agreed to provide the original and additional financing for the Project, as set out in Agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for the Project referred to above.
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[s]. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement[s].
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[s], 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[s] (through the Project Steering Committee). 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
<b>IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT<sup>1</sup></b>			
A	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Maintain the following organizational structure and staffing arrangements with qualifications and experiences in E&amp;S risk management acceptable to the Association:</p> <p>one (01) Project Coordination Unit (PCU) within the Ministry of Energy, Water and Hydrocarbons (MEEH). PCU has and will maintain an E&amp;S focal point, and will include an Environmental Specialist, a Social Specialist; and</p> <p>(2) a Project Implementation Unit (PIU) within SONELEC, responsible for the management of environmental and social issues, with qualified staff and sufficient resources to support the management of environmental and social (E&amp;S) risks and impacts of the Project including, maintain an E&amp;S focal point, and the following positions specifically assigned to environmental and social risk management: environmental specialist and SEA/SH specialist, which are already hired, and an social specialist that will be hired..</p>	<p>Maintain E&amp;S and GBV specialists already hired.</p> <p>Hire social specialist no later than March 2025.</p> <p>Thereafter maintain these positions throughout Project implementation.</p>	<p>MEEH PCU</p> <p>SONELEC PIU</p>
B	<p><b>CAPACITY BUILDING PLAN/MEASURES</b></p> <p>Prepare and implement the capacity building plan which include the below topics</p> <ul style="list-style-type: none"> <li>• Stakeholder Engagement</li> <li>• Workers Code of Conduct, with SEA/SH provisions</li> <li>• Health and Safety for Workers and Communities: Hazards and Risks, Measures to Address Hazards and Risks, Emergency Procedures</li> <li>• Emergency preparedness and response including in hospital operations</li> <li>• SEA/SH Risk Management</li> <li>• Training on the inclusion of vulnerable and disadvantaged groups in the stakeholder engagement processes</li> <li>• Grievance Mechanisms</li> <li>• E&amp;S Risk management in Hospital operations</li> <li>• Life &amp; Fire safety in healthcare operations</li> <li>• Infectious control management and integrated waste management in hospitals</li> <li>• Development, implementation, monitoring and reporting in accordance with the SEP</li> <li>• Awareness and prevention of sexually transmitted infections</li> <li>• GBV awareness including SEA/SH and child protection</li> <li>• Raising awareness on barrier measures against the spread of epidemics/pandemics.</li> </ul>	<p>Commencement of the project for the PIU and PCU staff, during the Project implementation, and throughout the life of the Project</p>	<p>MEEH PCU</p> <p>SONELEC PIU</p>
<b>MONITORING AND REPORTING</b>			

<sup>1</sup> For all actions, consult with the country lawyer to ensure consistency with the legal agreement in cases where some actions need to be completed before the project becomes effective (effectiveness condition) or before certain disbursements can occur (disbursement condition).

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
C	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (E&amp;S) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> <li>• Status of preparation and implementation of E&amp;S risk management documents and actions required under the ESCP.</li> <li>• Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan.</li> <li>• Record of complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them, classified by priority level, typology, and severity.</li> <li>• Summary of the E&amp;S performance of contractors and subcontractors as reported through regular contractors' and supervision firms' reports.</li> <li>• Number and status of resolution of incidents and accidents reported under action E below.</li> <li>• Status of the implementation of labor management procedures (LMP) and Sexual Exploitation and Abuse - Sexual Harassment (SEA/SH Action Plan).</li> </ul>	<p>Submit a consolidated quarterly report to the Association throughout Project implementation, commencing six (06) months after the parent project Effective Date. Submit each report to the Association no later than 15 days after the end of each reporting period.</p>	MEEH PCU
D	<p><b>CONTRACTORS' MONTHLY REPORTS</b></p> <p>Require contractors and supervising firms to provide monthly monitoring reports on E&amp;S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>	<p>Submit the monthly reports to the Association as annexes to the reports indicated under action C above, or upon request of the Association.</p>	MEEH PCU SONELEC PIU
E	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Notify the Association of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including SEA-SH incidents, accidents resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment;; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.</p>	MEEH PCU SONELEC PIU
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>1.1</p> <p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b></p> <p>a) Update and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p> <p>b) Prepare and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for the electrification of El Marouf Hospital, for the construction and operation of El Marouf hospital and also if needed for additional agreed activities, consistent with the relevant ESMF. Implement ESIA/ESMP already developed during the Project preparation and the implementation phase :</p> <ul style="list-style-type: none"> <li>• for the Construction of Photovoltaic plant, and Battery storage infrastructure in Grande Comore, consistent with the relevant ESSs;</li> <li>• for the Construction of Photovoltaic plant, and Battery storage infrastructure in Anjouan consistent with the relevant ESSs;</li> <li>• for the Construction of Photovoltaic plant, and Battery storage infrastructure in Moheli consistent with the relevant ESSs;</li> <li>• For the interconnection line between the thermal power plant and the Ngazidja solar photovoltaic power plant in accordance with the relevant ESS;</li> <li>• For the interconnection line between the thermal power plant and the Ndzouani solar photovoltaic power plant in accordance with the relevant ESS.</li> </ul>	<p>a) Update the ESMF no later than one month after the Additional Financing Agreement (AF) effective date, and thereafter disclose and implement the ESMF throughout Project implementation. Any subsequent update of the ESMF should be subject to approval by the Association before its implementation.</p> <p>b) Prepare and publish the ESIA and ESMP prior to starting the bidding processes for the new contracts with the firm in charge of targeted works, and thereafter implement the ESIA and ESMPs throughout Project implementation.</p>	<p>MEEH PCU SONELEC PIU</p>
<p>1.2</p> <p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>a) Incorporate the relevant aspects of the ESCP, including, inter alia, , the Labor Management Procedures (LMP), and code of conduct, into the E&amp;S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&amp;S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association.</p>	<p>a) As part of the preparation of procurement documents and respective contracts, supervise suppliers and service providers/subcontractors throughout the implementation of the Project. At the request of the Association, copies of the relevant contracts shall be made available to it.</p>	<p>MEEH PCU SONELEC PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>b) Require the development and implementation of the following procedures applicable to contractors, subcontractors and supervisory firm: Constructor ESMP (C-ESMP), Health, Safety and Environment Plan (PHSSE), Operational Health and Safety (OHS) Measures, Environmental and Social Clauses, Codes of Conduct and Grievance Mechanism, Social Commitments on Child Labor and Other Elements of Gender-Based Violence/EAS-HS Action Plan.</p>	<p>b) Prior to the implementation of the Project activity that requires the adoption of such procedures. The contractor's ESMP (C-ESMP) must be approved by the Association prior to the commencement of the civil works. Supervise contractors throughout project implementation.</p>	
1.3	<p><b>TECHNICAL ASSISTANCE</b> Carry out the consultancies, studies (including feasibility studies, if applicable, capacity building, training, and any other technical assistance activities under the component 3 of the Project in accordance with terms of reference acceptable to the Association, after they have been reviewed by qualified E&amp;S specialists at the PCU and PIU, to ensure that are consistent with the ESSs and ESCP provisions. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	<p>Throughout Project implementation. As part of the tender process for the respective technical assistance, supervise compliance throughout throughout the implementation of the Project.</p>	<p>MEEH PCU SONELEC PIU</p>
1.4	<p><b>CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING</b></p> <p>a) Ensure that the CERC Manual as specified the legal agreement includes a description of the E&amp;S assessment and management arrangements including CERC-ESMF that will be included or referred to in the CERC Manual for the implementation of CERC component in accordance with the ESSs.</p> <p>b) Implement the E&amp;S provisions of the CERC Manual including the amendment of the CERC-ESMF and any assessments and plans required therein, in accordance with the CERC Manual and if applicable, with the CERC-ESMF and relevant ESSs.</p>	<p>a. The preparation of the CERC Manual and, if applicable, other E&amp;S documents, as relevant in form and substance acceptable to the Association is a withdrawal condition under Section III.B of Schedule 2 of the Project.</p> <p>b. In accordance with the timeframes specified in the CERC Manual including, the amendment of the CERC-ESMF and any assessments and plans required therein. Adopt any required E&amp;S instrument and include it in the respective tender process, where applicable, and in any case, prior to the completion of the relevant project activities for</p>	<p>MEEH PCU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		which the E&S instrument is required.	
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>a) Implement the Labor Management Procedures (LMP) of the parent Project.</p> <p>b) Ensure the signing of contracts, including the Code of Conduct, with Direct Workers as well as Contract Workers in accordance with the guidelines of the LMP. PIU and PCU will ensure these requirements are also implemented among contractors and sub-contractors.</p>	<p>a) LMP has been finalized and disclosed on April 15, 2022. Implement the LMP throughout Project implementation.</p> <p>b) Prior to commencement of works for the project/contractor staff to maintain throughout the implementation of the project.</p> <p>Any updated version shall need to be submitted to the Association for approval.</p>	MEEH PCU SONELEC PIU
2.2	<p><b>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</b></p> <p>Prepare and implement an OHS Management Plan to assess and manage the OHS risks and impacts of the Project.</p> <p>Require contractors and subcontractors to prepare and implement OHS Management Measures or Plan in accordance with the National Labor Code and other relevant national regulations in force and the requirements of the ESS 2 as defined in the LMP</p> <p>PIU and PCU will ensure these requirements are also implemented among contractors and sub-contractors.</p>	Same timeline of LMP for the PIU/PCU; and as part of the C-ESMP for firms in charge of works (same timeline as 1.2.b) and thereafter implement the plan throughout Project implementation.	MEEH PCU SONELEC PIU
2.3	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish and operate a grievance mechanism for PCU and PIU staff, as well as contractors and sub-contractors' workers, in relation to any matter relating to work or employment under the Project, as described in the LMP and consistent with ESS2.</p> <p>PIU and PCU will ensure these requirements are also implemented among contractors and sub-contractors.</p>	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	MEEH PCU SONELEC PIU
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3.1	<p><b>WASTE MANAGEMENT PLAN</b></p> <p>a) Prepare and implement a Waste Management Plan (WMP), and a Waste Electrical and Electronic Equipment Management Plan (WEEEMP) as part of the ESMP prepared for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS3.</p> <p>b) Require contractors to develop and implement site-specific non-hazardous waste and hazardous waste management plans.</p> <p>PIU will ensure these requirements are also implemented among contractors and sub-contractors, including firms in charge of works, consultants and entrepreneurs.</p>	<p>a) Same timeframe as for the preparation and implementation of the ESMP – see 1.1.b.</p> <p>b) Same timeframe as for the preparation and implementation of the C-ESMP – see 1.2.b.</p>	SONELEC PIU
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 1.1.b above and in accordance with ESMF</p>	Same timeframe as for the preparation and implementation of the ESMP – see 1.1.b.	SONELEC PIU
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>Incorporate measures to manage traffic and road safety risks such as transport vehicles as required in the ESMP to be prepared under action of all project activities.</p>	Same timeframe as for the preparation and implementation of the ESMP – see 1.1.b.	SONELEC PIU
4.2	<p><b>COMMUNITY HEALTH AND SAFETY</b></p> <p>a) 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, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF in a manner satisfactory to the Association.</p> <p>b) Develop an Emergency preparedness and response for hospital operations</p> <p>c) Develop a Life and Fire Safety action plan and measures for the hospital that need to be reviewed and approved by the bank as part of the design phase of the hospital as stipulated in the WBG EHS guidelines for new public access buildings</p>	<p>a) Same timeframe as for the preparation and implementation of the ESMP – see 1.1.b.</p> <p>b) Same timeframe as for the preparation and implementation of the ESMP – see 1.1.b.</p> <p>c) Same timeframe as for the preparation and implementation of the ESMP – see 1.1.b.</p>	SONELEC PIU
4.3	<p><b>SEA AND SH RISKS</b></p> <p>a) Implement the existing standalone SEA/SH Action Plan to assess and manage the risks of SEA and SH, in accordance with the Association's guidelines and national legislation on GBV/SEA-SH.</p> <p>B) Ensure that Codes of Conduct, and SEA/SH measures are integrated into all contracts and in all bidding documents (ToRs, MoFs, workers' contracts).</p>	a) Implement the SEA/SH Action Plan throughout Project implementation. Any updates to SEA/SH action plan should be submitted to the Association for approval before implementation.	MEEH PCU SONELEC PIU



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		b) During preparation of bidding document and contract	
4.4	<p><b>SECURITY MANAGEMENT</b></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 include a reference to the instrument where such measures are reflected, as needed, as set out in the ESMP to be developed for each Project site, guided by the principles of proportionality and GIIP, and by applicable law, with respect to the hiring, rules of conduct, training, equipment and monitoring of such personnel.</p>	<p>Prior to engaging security personnel and thereafter implemented throughout Project implementation During the preparation of ESIA.</p> <p>Due to their nature, security assessments and management plans will not be publicly disclosed.</p>	<p>MEEH PCU SONELEC PIU</p>
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<p><b>RESETTLEMENT FRAMEWORK and PLAN</b></p> <p>a) Implement the existing Resettlement Policy Framework (RPF) of the Project, published on April 15, 2022 and consistent with ESS5, in a manner satisfactory to the Association.</p> <p>b) Implement Resettlements Plan (RP) already developed for within the parent project and prepare new RP if necessary or a Livelihoods Restoration Plan (LRRP) for each project activity for which a RP or a LRRP is required, as specified in the RPF and in accordance with ESS No. 5,</p> <ul style="list-style-type: none"> <li>• for the Construction of Photovoltaic plant, and Battery storage infrastructure in Grande Comore, consistent with the relevant ESSs;</li> <li>• for the Construction of Photovoltaic plant, and Battery storage infrastructure in Anjouan consistent with the relevant ESSs;</li> <li>• for the Construction of Photovoltaic plant, and Battery storage infrastructure in Moheli consistent with the relevant ESSs;</li> <li>• For the interconnection line between the thermal power plant and the Ngazidja solar photovoltaic power plant in accordance with the relevant ESS;</li> <li>• For the interconnection line between the thermal power plant and the Ndzouani solar photovoltaic power plant in accordance with the relevant ESS.</li> </ul>	<p>a) Implement the RPF developed throughout Project implementation.</p> <p>b) Prepare and implement the measures of the respective RP prior to carrying out the relevant works in the affected areas, including ensuring that before taking possession of the land and related assets, full compensation has been provided and, as applicable, displaced people have been resettled and moving allowances have been provided.</p>	<p>MEEH PCU SONELEC PIU</p>
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p><b>BIODIVERSITY RISKS AND IMPACTS</b></p> <p>Prepare and implement a Biodiversity Management Plan (BMP) as part of the ESMP in accordance with the guidelines of the ESIA prepared for the Project, and consistent with ESS6.</p>	<p>Same timeframe as for the preparation and implementation of the ESMP – see 1.1.b.</p>	<p>SONELEC PIU</p>
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<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) as part of the ESMP in accordance with the guidelines of the ESIA prepared for the Project, and consistent with ESS8. Monitor potential impacts and risks associated with cultural heritage, tangible and intangible.	Same timeframe as for the preparation and implementation of the ESMP – see 1.1.b.	SONELEC PIU
8.2	<b>CHANCE FINDS</b> Describe and implement the chance finds procedures as part of the ESMP of the Project and in application of the ESMF guidelines and in accordance with NES no. 8.	Same timeframe as for the preparation and implementation of the ESMP – see 1.1.b. Apply the procedures throughout the implementation of the project	SONELEC PIU
<b>ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]</b>			
<b>NOT RELEVANT</b>			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN</b> Update and implement the current Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which already 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. Personally identifiable information of the participants in the stakeholder engagement activities will not be publicly disclosed.	Review the SEP prior FA Project appraisal, disclose it, and thereafter implement the SEP throughout Project implementation, including a record of the stakeholder engagement activities carried out.  Any updates of this SEP should be submitted to the Association for approval.	MEEH PCU SONELEC PIU
10.2	<b>PROJECT GRIEVANCE MECHANISM</b> Implement the GRM of the project developed within the SEP at the same time as the SEP. This mechanism should be disclosed in order to 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.  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.	Maintain and implement existing grievance mechanism throughout Project implementation. Periodically update the GRM as necessary, throughout the implementation of the project. Any updates to the GRM should be submitted to the Association for approval prior to implementation.	MEEH PCU SONELEC PIU
<b>INDICATORS FOR IMPLEMENTATION READINESS</b>			
The following actions are indicators for implementation readiness:			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none"> <li>a) <b><u>Organizational structure:</u></b> <ul style="list-style-type: none"> <li>1. Availability of E&amp;S Specialists at the PCU/PIU during project implementation</li> </ul> </li> <li>b) <b><u>Capacity-building plan/measures</u></b> <ul style="list-style-type: none"> <li>2. Training on E&amp;S aspects provided in accordance with the capacity-building plan</li> </ul> </li> <li>c) <b><u>Environmental and social risk instruments and actions</u></b> <ul style="list-style-type: none"> <li>3. E&amp;S risk management documents required by the project disclosed in accordance with ESCP timeframes.</li> <li>4. Grievance mechanism functioning, consistent with the provisions of the SEP.</li> </ul> </li> </ul>		