

**Republic of Ghana**

**Ministry of Food and Agriculture**

**West Africa Food System Resilience  
Program (P178132) and Additional  
Financing**

**Phase 2 Under the Multiphase Programmatic Approach**

**Negotiated**

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

**March 13, 2025**

## **ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN**

1. The Republic of Ghana (the Recipient) is implementing the West Africa Food System Resilience Program – Phase 2 under the Multiphase Programmatic Approach Project (the Project), with the involvement of the Ministry of Food and Agriculture (MoFA), as set out in the Financing Agreement and the Grant Agreement (the Agreements). The International Development Association (IDA) has agreed to provide the original financing (P178132) and the International Bank for Reconstruction and Development (IBRD) and the IDA (IBRD and IDA together, the Bank) acting as the administrator of the Food Systems 2030 Multi-Donor Trust Fund, have agreed to provide additional financing for the Project, as set out in the referred agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing (P181488) 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 Bank. The ESCP is a part of the Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the 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, 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 Bank. Said E&S documents may be revised from time to time with prior written agreement by the Bank. As provided for under the referred Agreements, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Bank 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 Bank and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Recipient's Representative specified in the

Agreements or the Recipient's Chief Director of MoFA. 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 |
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|                               | <p>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 documents required under the ESCP.</li> <li>• Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan.</li> <li>• Complaints submitted to the grievance mechanism, the grievance log, and progress made in resolving them.</li> <li>• E&amp;S performance of contractors and subcontractors as reported through contractors' and supervision firms' reports.</li> <li>• Number and status of resolution of incidents and accidents reported under action E below.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                           | implementation, commencing after the Effective Date. Submit each report to the Bank no later than 05 days after the end of each reporting period.                                                                                                                                                                                             |                    |
| 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 Bank.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Submit the monthly reports to the Bank upon request throughout the Project implementation period starting from the Effective Date                                                                                                                                                                                                             | PIU                |
| E                             | <p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Notify the Bank 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 those 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; dam failure; 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 Bank 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 Bank, 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 Bank 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 Bank no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.</p> | PIU                |

| MATERIAL MEASURES AND ACTIONS                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | TIMEFRAME                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | RESPONSIBLE ENTITY |
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| <b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                    |
| 1.1                                                                                   | <b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b><br><br>1. Prepare and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for relevant subprojects, consistent with the relevant ESSs.<br>2. Adopt and implement the Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.                                                                                                                                                                                     | 1. Prepare the ESIA prior to carrying out the relevant subproject activity and thereafter implement the ESMP throughout Project implementation.<br><br>2. The ESMF was adopted on March 10, 2022, under the original financing and shall be implemented throughout Project implementation.<br><br>3. Incorporate the ESMP as part of the respective bidding documents for the respective subproject prior to the carrying out of subproject that requires the preparation of such ESMP. Once finalized, implement the respective ESMP throughout Project implementation. | PIU                |
| 1.2                                                                                   | <b>MANAGEMENT OF CONTRACTORS</b><br><br>Incorporate the relevant aspects of the ESCP, including, inter alia, the ESMF, ESIA, ESMPs, the Labor Management Procedures, and code of conduct, into the E&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&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Bank. | As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Bank upon request.                                                                                                                                                                                                                                                                                                                                                                   | PIU                |
| 1.3                                                                                   | <b>TECHNICAL ASSISTANCE</b><br><br>Carry out the consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of                                                                                                                                                                                                    | Throughout Project implementation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | PIU                |

| MATERIAL MEASURES AND ACTIONS              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | TIMEFRAME                                                                                                                                                                                                                                                                                                                                                                    | RESPONSIBLE ENTITY |
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|                                            | reference.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                              |                    |
| 1.4                                        | <p><b>CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING</b></p> <p>1. Ensure that the CERC Manual 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 Part, in accordance with the ESSs.</p> <p>2. Implement the E&amp;S provisions of the CERC Manual including the CERC-ESMF and any assessments and plans required therein.</p>                                                                                                | <p>1. The adoption of the CERC Manual in form and substance acceptable to the Bank is a withdrawal condition under Section III.B. of Schedule 2 of the Financing Agreement and the Grant Agreement for the Project.</p> <p>2. Implement the CERC Manual including the CERC-ESMF and relevant E&amp;S assessments and plans throughout the project implementation period.</p> | PIU                |
| 1.5                                        | <p><b>PERMITS, CONSENT and AUTHORIZATION</b></p> <p>Secure relevant permits, consents and authorizations applicable to the subproject activities from relevant national authorities and agencies</p> <p>Comply or cause to comply as appropriate, with the conditions established in these permits, consents and authorization throughout Project implementation.</p>                                                                                                                                                                                                 | Obtain permits, consents, and authorizations before commencing relevant project activities. Thereafter, implement and comply with permits, consents and authorizations throughout project implementation                                                                                                                                                                     | PIU                |
| <b>ESS 2: LABOR AND WORKING CONDITIONS</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                              |                    |
| 2.1                                        | <p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Adopt and implement the Labor Management Procedures (LMP) prepared 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> | The LMP adopted on March 10, 2022, under original financing, shall be implemented throughout Project implementation.                                                                                                                                                                                                                                                         | PIU                |
| 2.2                                        | <b>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                              |                    |

| MATERIAL MEASURES AND ACTIONS                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | TIMEFRAME                                                                                                                                                                                                                                                                                                                    | RESPONSIBLE ENTITY |
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|                                                                           | Require contractors and subcontractors to prepare and implement OHS Management Measures or Plan in accordance with the relevant ESIA's applicable to the works being undertaken.                                                                                                                                                                                                                                                                                                                                                                            | Prepare the OHS Management Plan prior to commencement of related works and thereafter implement the plan throughout Project implementation.                                                                                                                                                                                  | PIU                |
| 2.3                                                                       | <b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b><br><br>Continue to operate the grievance mechanism established under the original financing for Project workers, as described in the LMP and consistent with ESS2.                                                                                                                                                                                                                                                                                                                                           | Maintain and operate the workers' grievance mechanism throughout Project implementation.                                                                                                                                                                                                                                     | PIU                |
| <b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                              |                    |
| 3.1                                                                       | <b>WASTE MANAGEMENT PLAN</b><br><br>1. Adopt and implement a Waste Management Plan (WMP) either as a standalone plan or as part of the ESMP, to manage hazardous and non-hazardous wastes, consistent with ESS3.<br><br>2. Prepare, adopt, disclose, and implement an electronic and electrical equipment waste (e-waste) management plan, consistent with ESS3.                                                                                                                                                                                            | 1. Adopt the WMP prior to commencement of waste generation activities, and thereafter implement the WMP throughout Project implementation.<br><br>2. Prepare, adopt, and disclose the e-waste management plan within 3 months after the Effective Date, and thereafter implement the plan throughout Project implementation. | PIU                |
| 3.2                                                                       | <b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b><br><br>1. Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.1 above.<br><br>2. Ensure that ground water balance assessments are conducted as part of feasibility studies for areas where boreholes are proposed for irrigation.<br><br>3. Ensure that pest management follows the integrated approaches identified in the Integrated Pest Management Plan (IPMP) for the original financing and that pesticides | 1. Same timeframe as for the preparation and implementation of the ESMP.<br><br>2. Before commencement of borehole construction                                                                                                                                                                                              | PIU                |

| MATERIAL MEASURES AND ACTIONS             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | TIMEFRAME                                                                                                                                       | RESPONSIBLE ENTITY |
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|                                           | used are manufactured, formulated, packaged, labeled, handled, stored, and disposed of, in accordance with Good International Industry Practice (GIIP) as well as the World Bank Group's Environmental Health and Safety Guidelines (EHSGs).                                                                                                                                                                                                                                                                                                                                                                        | 3. The IPMP was adopted and disclosed on March 10, 2022, for the original financing and shall be implemented throughout Project implementation. |                    |
| <b>ESS 4: COMMUNITY HEALTH AND SAFETY</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                 |                    |
| 4.1                                       | <b>TRAFFIC AND ROAD SAFETY</b><br><br>Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.1 above.                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Same timeframe as for the preparation and implementation of the ESMP.]                                                                          | PIU                |
| 4.2                                       | <b>COMMUNITY HEALTH AND SAFETY</b><br><br>Assess and manage specific risks and impacts to the community arising from Project activities including behavior of Project workers, risks of labor influx, response to emergency situations, SEA/SH and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.                                                                                                                                                                                                                                                                             | Same timeframe as for the preparation and implementation of the ESMPs.                                                                          | PIU                |
| 4.3                                       | <b>SEA AND SH RISKS</b><br><br>Adopt and implement a SEA/SH Prevention and Response Action Plan as part of the ESMP, to assess and manage the risks of SEA and SH.                                                                                                                                                                                                                                                                                                                                                                                                                                                  | The SEA/SH Action Plan was adopted as part of the ESMF on March 10, 2022, and shall be implemented throughout Project implementation.           | PIU                |
| 4.4                                       | <b>SECURITY MANAGEMENT</b><br>The use of security personnel is not envisioned under the Project, but should this aspect change, assess and prepare a Security Management Plan 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, consistent with ESS4 and 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. | Prior to engaging security personnel and thereafter implemented throughout Project implementation                                               | PIU                |
| 4.5                                       | <b>DAM SAFETY (FOR ANNEX A ESS4)</b><br><br>1. For the Kpong Irrigation Scheme (KIS), submit to the Bank a recent Dam Safety Assessment (DSA) on the Kpong dam, under terms of reference, and in form and substance satisfactory to the Bank.                                                                                                                                                                                                                                                                                                                                                                       | Submit a recent DSA for Kpong dam to the Bank prior to commencement of civil works on KIS                                                       | PIU                |

| MATERIAL MEASURES AND ACTIONS                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | TIMEFRAME                                                                                                                                                                                                                                                                                                                                                  | RESPONSIBLE ENTITY |
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|                                                                                       | <p>2. For all other irrigation schemes relying on existing dam/reservoir which shall be identified during Project implementation, engage experienced and competent professionals to, inter alia: (a) inspect and evaluate the safety status of the respective dam, its appurtenances, and its performance history; (b) review and evaluate the owner's operation and maintenance procedures; and (c) provide a written report of findings and recommendations for any remedial work or safety related measures necessary to upgrade the dam to an acceptable standard of safety.</p> <p>3. Engage experienced and competent professionals for the supervision of the design and rehabilitation of each relevant dam and adopt and implement dam safety measures during the design, bid tendering, rehabilitation, operation, and maintenance of each relevant dam and associated works.</p> <p>4. Adopt and implement the following Dam Safety Plans for each relevant dam under the Project: (i) a plan for rehabilitation/construction supervision and quality assurance; (ii) an instrumentation plan; (iii) an operation and maintenance plan; and (iv) an emergency preparedness plan.</p> <p>5. Carry out a safety inspection of each relevant dam at intervals of not less than once every year during Project implementation, by independent experts whose terms of reference shall be acceptable to the Bank.</p> | <p>Submit TORs for the Bank's review and clearance before commencement of bidding processes.</p> <p>Submit DSAs to the Bank for review and clearance before commencement of civil works on the affected irrigation schemes.</p>                                                                                                                            |                    |
| <b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                            |                    |
| 5.1                                                                                   | <p><b>RESETTLEMENT FRAMEWORK AND PLANS</b></p> <p>1. Adopt and implement the Resettlement Policy Framework (RPF) prepared for the original financing, consistent with ESS5.</p> <p>2. Prepare, adopt and implement a resettlement action plan (RAP) for each activity under the Project for which the RPF requires such RAP, as set out in the RPF, and consistent with ESS5.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <p>1. The RPF was adopted on March 10, 2022, and shall be implemented throughout Project implementation</p> <p>2. Prepare, adopt and implement the respective RAP, including ensuring that before taking possession of land and related assets, full compensation has been provided, and as applicable displaced people have been resettled and moving</p> | PIU                |

| MATERIAL MEASURES AND ACTIONS                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | TIMEFRAME                                                                                                                                                        | RESPONSIBLE ENTITY |
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|                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | allowances have been provided.                                                                                                                                   |                    |
| <b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                  |                    |
| 6.1                                                                                                         | <b>BIODIVERSITY RISKS AND IMPACTS</b><br><br>Adopt and implement biodiversity management measures as part of the ESMF, and in ESIAs and ESMPs to be subsequently developed consistent with ESS6.                                                                                                                                                                                                                                                                                                                                                                                                                       | The same timeframe as for the adoption and implementation of the ESMF, ESIAs and ESMPs, and thereafter implement the measures throughout Project implementation. | PIU                |
| <b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                  |                    |
| 7.1                                                                                                         | This ESS is not relevant to this Project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                  |                    |
| <b>ESS 8: CULTURAL HERITAGE</b>                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                  |                    |
| 8.1                                                                                                         | <b>CULTURAL HERITAGE RISKS AND IMPACTS</b><br><br>Prepare, adopt and implement, if needed, a Cultural Heritage Management Plan (CHMP) as part of the ESMP, in accordance with the guidelines of the ESMF prepared for the Project, and consistent with ESS8.                                                                                                                                                                                                                                                                                                                                                           | Prepare and adopt CHMP with the same timelines as the ESMP, and thereafter implement the CHMP throughout Project implementation.                                 | PIU                |
| 8.2                                                                                                         | <b>CHANCE FINDS</b><br>Describe and implement the chance finds procedures as part of the ESIAs and ESMPs of the Project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Incorporate the chance find procedures (as described in the [ESMF] in ESIAs and ESMP. Implement the procedures throughout Project implementation].               | PIU                |
| <b>ESS 9: FINANCIAL INTERMEDIARIES</b>                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                  |                    |
| 9.1                                                                                                         | This standard is not relevant to this Project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                  |                    |
| <b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                  |                    |
| 10.1                                                                                                        | <b>STAKEHOLDER ENGAGEMENT PLAN</b><br><br>1. Adopt and implement the Stakeholder Engagement Plan (SEP) prepared for the Project, consistent with ESS10, which includes measures to, inter alia, provide stakeholders (including tomatoes value chain actors in the northern zone and middle belt zone) 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.<br>2. Develop an Annex report to the SEP to cover the needs of tomatoes farmers and value | 1. The SEP was adopted on May 4, 2022, and shall be implemented throughout Project implementation.<br>2. Develop an Annex report to the SEP within 3 months      | PIU                |

| MATERIAL MEASURES AND ACTIONS                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | TIMEFRAME                                                                                                                                    | RESPONSIBLE ENTITY |
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|                                                | chain actors in the northern zone and middle belt zone where the AF interventions on tomatoes will take place.                                                                                                                                                                                                                                                                                                                                                                                | after the Effective Date of the additional financing and thereafter implement the Annex report to the SEP throughout Project implementation. |                    |
| 10.2                                           | <b>PROJECT GRIEVANCE MECHANISM</b><br><br>The grievance mechanism as described in the SEP is now established and operational 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. | Continue maintaining and operating the grievance mechanism throughout Project implementation                                                 | PIU                |
| <b>INDICATORS FOR IMPLEMENTATION READINESS</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                              |                    |
| None                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                              |                    |