

Federal Republic of Nigeria

**Agro-Climatic Resilience in Semi-Arid Landscapes (ACReSAL)
(P175237)**

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

Additional Financing Appraisal Stage Version

22/09/2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Federal Republic of Nigeria (the Recipient) is implementing Agro-Climatic Resilience in Semi-Arid Landscapes (ACReSAL) Project (the Project) with the involvement of the Federal Ministry of Environment (FME) as lead, and Federal Ministry of Agriculture and Rural Development (FMARD), and Federal Ministry of Water Resources (FMWR) as co-lead implementing agencies, as set out in the Original Financing Agreement and the Additional Financing Agreement (the Agreements). The International Development Association (the Association) and the International Bank for Reconstruction and Development (the Bank) have 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 Bank and the Association. 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, 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 and Association. Said E&S documents may be revised from time to time with prior written agreement by the Bank and the Association. 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, 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 Bank, the Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank, the Association and the Recipient's Representative specified in the Agreements. 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
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT ¹			
A	ORGANIZATIONAL STRUCTURE Maintain throughout Project implementation an organizational structure with qualified staff to support management of E&S risks in sufficient numbers including at least one Environmental Specialist, one Social Specialist, one GRM officer, one Gender/GBV specialist, and one dam safety specialist in the Federal Project Management Unit (FPMU) and each of the State Project Management Units (SPMUs) (collectively “PMUs”). Engage and maintain one Security Management Officer (SMO) to monitor the implementation of the Security Management Plan under action 4.4 below. Maintain Dam Safety Panel of Experts with qualification, experience and terms of reference acceptable to the Association to advise on dam safety and report to the Bank and the Association.	Maintain the PMUs and retain the positions throughout Project implementation. Engage SMO prior to commencement of subproject activities that have any security risks under the AF, and maintain the position throughout the Project implementation Before commencement of dam related activities	PMUs at Federal and State levels PMUs at Federal and State levels PMU at state level

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	CAPACITY BUILDING PLAN/MEASURES Prepare, update and implement the capacity building plan including the following: • Application of ESS1 to ESS10 relevant to the Project, including AF. • Stakeholder mapping and engagement • Implementation of ESMF, SMP, IPMP, LMP, BMP, RAP and RPF • E&S requirements of subprojects • Training in dam safety requirements and good international industry practice. • Capacity building on Dam Safety Management Plans (DSMPs). • Biodiversity and Natural Resource Management • Safe management of high-risk construction activities • Monitoring, reporting, and incident management requirements. • Contractor Environmental and Social Management Plans (C-ESMPs). • Subproject environmental and social screening procedures • World Bank ESF • Occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations. • Effective GRM operation • Technical, Planning and Operational Aspects of RAP • SEA/SH and Accountability and Response approach including CoC. • Community health and safety) Communities (construction stage impacts, safety provisions, OHS guidelines)	Throughout Project implementation	PMUs at Federal and State levels
MONITORING AND REPORTING			
C	REGULAR REPORTING Prepare and submit to the Bank and the Association regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include: • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Implementation of E&S Instruments • Occupational Health and Safety (OHS)	Each six (6) months starting from the Effective Date.	PMUs at Federal and State levels

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	- Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. - E&S performance of contractors and subcontractors as reported through contractors' and supervision firms' reports. - Number and status of resolution of incidents and accidents reported under action E below. [specify other aspects that the reporting would need to consider, as relevant].		
D	CONTRACTORS' MONTHLY REPORTS Require contractors, subcontractors, and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Bank and the Association	Monthly reports shall be submitted to the PMUs (federal or state level; whoever is managing the contractor or subcontractor), and to the Bank and the Association throughout the term of the contracts or subcontracts	PMUs at Federal and State levels
E	INCIDENTS AND ACCIDENTS Notify the Bank and 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 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/Association] upon request. Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the [Bank/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.	Notify the Bank and Association, no later than 48 hours after learning of the incident or accident. Provide available details upon request. Provide review report and Corrective Action Plan to the Bank and Association no later than 10 days after the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank and the Association.	PMUs at Federal and State level (State PMUs will copy Federal PMU in their communication to the Bank and the Association) PMUs at Federal and State levels
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS 1. Update and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) before commencement of subproject activities, consistent with the relevant ESSs. 2. Update and implement the Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs. 3. As set out in the ESMF, prepare, update and implement ESIA/ESMPs and other associated plans, where required, including Flood Emergency Preparedness Plan, Emergency Preparedness and Response Plan, Dam safety management plan as needed in a manner acceptable to the Association. 4. Apply screening procedures to ensure that Project, including AF-supported water infrastructure activities meet the eligibility criteria outlined in the ESIA/ESMF/ESMPs and are consistent with the environmental, social, dam safety assessments conducted for the Project, consistent with the relevant ESSs.	1. Update the ESIA and ESMP prior to commencement of AF activities that require ESIA/ESMP and thereafter implement the ESIA and ESMP throughout Project implementation. 2. Prepare/update the ESMF prior to AF Appraisal and thereafter implement the ESMF throughout Project implementation. 3. Prepare the ESIA/ESMP, DSMPs and incorporate the ESMP, DSMPs as part of the respective bidding documents for the respective subproject activity prior to the carrying out of subproject activity under the AF that requires the preparation of such ESMP or DSMP. Once finalized, implement the respective ESMP and DSMPs throughout Project implementation. 4. Throughout Project implementation and prior to commencement of each respective activity under the Project	PMUs at Federal and State levels
1.2	MANAGEMENT OF CONTRACTORS	Prior to launching bidding processes.	PMUs at Federal and State levels

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Incorporate the relevant aspects of the ESCP, including, inter alia, the Labor Management Procedures, and code of conduct, etc. 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 and the Association.	Maintain Supervision of contractors and supervising firms throughout Project implementation. provide copies of relevant contracts to the Bank and the Association upon request.	
1.3	TECHNICAL ASSISTANCE Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project, including, inter alia, Dam Safety Management Plan(DSMP), Flood management plans, OHS, ESMPs, GMs, GBV) in accordance with terms of reference acceptable to the Bank and Association, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.	Throughout Project implementation.	PMUs at Federal and State levels
1.4	CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING 1. Ensure that the CERC Manual as specified in the legal agreement includes a description of the E&S assessment and management arrangements including any CERC-ESMF/ESMF Addendum that will be included or referred to in the CERC Manual for the implementation of CERC component, in accordance with the ESSs. 2. Implement the E&S provisions of the CERC Manual including, if applicable, the CERC-ESMF/ESMF Addendum, and any assessments and plans required therein.	1. As soon as the CERC is activated 2. In accordance with the timeframes specified in the CERC Manual including the CERC-ESMF/ESMF Addendum, and any assessments and plans required therein.	PMU at the Federal level.
1.5	ASSOCIATED FACILITIES Recipient to ensure that the activities in the borrow pits management plans are carried out in accordance with the applicable requirements of this ESCP and the ESSs, including, inter alia, the ESMP, LMP, management of contractors, RAP, SEP, etc.	Throughout Project implementation	PMUs at Federal and State levels
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES	Adopt the LMP that has been prepared and implement throughout the Project implementation.	PMUs at Federal and State levels

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Implement labor management procedures (LMP) that have been prepared for the Project and adopt for the AF to cover expanded workforce. The LMP outlines the issues related to child labor, labor influx, working conditions and how to manage labor force on the Project. The provisions of the LMP will be adopted by contractors, the Federal and State PMUs and other relevant implementing agencies.	Contractors / supervising engineers will adopt specific activities consistent with the LMP approved by FPMU prior to start of work including adequate remedies	
2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN Update and implement an OHS Management Plan to assess and manage the OHS risks and impacts of the Project. AND Require contractors and subcontractors to prepare and implement OHS Management Measures or Plan in accordance with the ESIA/ESMP.	Update the OHS Management Plan prior to commencement of subproject activities and thereafter implement the plan throughout Project implementation. Throughout Project implementation	PMUs at Federal and State levels
2.3	GRIEVANCE MECHANISM FOR PROJECT WORKERS Adopt, maintain and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Adopt the GM prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	PMUs at State levels
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Update and implement a Waste Management Plan (WMP), as part of the ESMP prepared for the Project, to manage hazardous and non-hazardous waste, consistent with ESS3.	Adopt the updated WMP prior to commencement of subproject activities and thereafter implement the WMP throughout Project implementation.	PMUs at Federal and State levels
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the site specific ESMP to be updated under action 1.1 above.	Same timeframe as for updating and implementation of the ESIA/ESMP under action 1.1 above	PMUs at Federal and State levels

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Adopt, and implement subproject specific Pest Management Plans (PMPs), as per general guidance provided by Project IPMP and ensure the pest management follows integrated approaches identified in the IPMP and the pesticides used are manufactured, packaged, labelled, handled, stored and disposed of, in accordance with national regulations, good international industry practices (GIIP), and World Bank Group's ESHGs	Prior to commencement of any pesticide related work and during preparation of site-specific ESMPs and implement throughout Project implementation	PMUs at Federal and State levels
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the ESMP to be updated under action 1.1 above.	Same timeframe as for the update and implementation of the ESIA/ESMP under action 1.1 above.	PMUs at Federal and State levels
4.2	COMMUNITY HEALTH AND SAFETY Adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities such as communicable diseases, contamination of public water resources, security risk; and include these measures in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Association and the Bank	Incorporate in site-specific ESMPs prior to commencement of work and implement throughout Project implementation.	PMUs at Federal and State levels
4.3	SEA AND SH RISKS Update, as necessary, and Implement the Sexual Exploitation and Abuse/ Sexual Harassment / Gender Based Violence (SEA/SH/GBV) Action Plan to mitigate the potential risk associated with SEA/SH.	Prior to commencement of subproject activities and thereafter implement throughout Project implementation	PMUs at Federal and State levels
4.4	SECURITY MANAGEMENT Update 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. Adopt State level Security Risk Assessment / Security Management Plan (SRAs and SMPs) will be prepared upon State Selections and prior to commencement of Project activities. Revise, adopt and implement the measures provided in the State and sub-project specific SRAs and SMPs to manage security risks for the community and Project workers. a) Use of Military and Security Actors	Update SRAs and SMPs no later than 3 months after AF Effective Date and implement measures prior to commencement of sub project activities that have any security risks under the AF, and implement throughout Project implementation	PMUs at State levels

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
Take, and cause the federal and each Participating State to update its SRA/SMP to take, the following measures related to the use of personnel to provide security for the implementation of Project activities, in a manner consistent with the ESSs and satisfactory to the Bank and the Association, inter alia: ▪ Create a management structure at the Federal level and in each Participating State to oversee security activities (including but not limited to security risk assessment, implementation of mitigation measures, monitoring, and revision), as set forth in the federal-level and relevant state-level Security Management Plans; ▪ Adopt and enforce standards, protocols and codes of conduct for the selection and use of both public and private security or military personnel adhering to the Voluntary Principles of Security and Human Rights, national and international standards and principles, and screen such personnel 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; ▪ Ensure that such personnel are deployed in accordance with the relevant requirements of ESSs, the ESCP [and the relevant state-level Security Management Plan]; ▪ Ensure that such personnel is adequately instructed and trained, 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 Project Implementation Manual, ESMF and the national and relevant state-level Security Management Plans; and ▪ Ensure that the stakeholder engagement activities under the Stakeholder Engagement Plan include a communication strategy on the involvement of security personnel under the Project; ▪ Ensure that any concerns or grievances regarding the conduct of such personnel are received, monitored, documented (taking into account the need to protect confidentiality), resolved through the Project's grievance mechanism; and reported to the Bank no later than [30] days after being received; and ▪ Where the Bank shall require, after consultation with the Borrower: (i) promptly appoint a third party monitoring (TPM) Consultant, with terms of reference,	Prior to deployment of security personnel and throughout Project implementation. Update SMP as needed throughout implementation	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	qualifications and experience satisfactory to the Bank, to visit and monitor the Project area where military, paramilitary or security personnel are deployed, collect relevant data and communicate with Project stakeholders and beneficiaries; (ii) require the TPM Consultant to prepare and submit monitoring reports, which shall be promptly made available to and discussed with the Bank; and (iii) promptly take any actions, as may be requested by the Bank upon its review of the TPM Consultant's reports. ▪ Include the SMP in the bidding documents of the contractors, and ensure the contractors comply with the requirements of SMP		
4.5	DAM SAFETY 1. Maintain the Dam Safety Review Panel (DSRP) with terms of reference and composition acceptable to the Association. The DSRP shall, among other tasks, conduct independent review of the investigation, design, and construction of the new dams and the start of operations; conduct safety assessment of project relevant existing dams or dams under construction (DUC) and review and confirm the adequacy of the design of rehabilitation and safety improvement works, quality of construction works, and other dam safety measures supported by the Project, including through the AF. No rehabilitation works involving dams or water storage infrastructure shall commence until the relevant dam safety instruments have been reviewed by the DSRP in a manner acceptable to the Association. 2. Ensure that all existing dams or DUC relevant to the Project, including the AF, are screened, and provide dam safety related reports to the World Bank, and submit the list of the relevant existing dams and DUC and dam safety related reports/documents to the World Bank once identifying the relevance of the dams. 3. Ensure the DSRP conduct independent dam safety assessment for project relevant existing dams and DUC and submit the dam safety assessment report prepared by the DSRP to the Bank. Based on such assessment, the Recipient shall prepare, adopt and implement appropriate dam safety measures and instruments, in a manner acceptable to the Bank and the Association. 4. Prepare/update and implement the following Dam Safety Plans:	1. Maintain the DSRP throughout Project implementation. 2. List of project relevant dams: two weeks after confirmation of the relevance of the dams. 3. Dam Safety Assessment Report of each dam shall be submitted to the Bank immediately after the DSRP completes the dam safety assessment. Procurement of civil works associated with the relevant dams should be conducted two (2) months after completion of the dam safety assessment. 4. For dam safety plans, the timelines for preparation or upgrading of dam safety plans will be discussed in line with the schedule of the civil works construction. Generally,	FPIU/PMUs at State level PMUs at State level

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
a) construction supervision and quality assurance plan (for new dam construction and dam rehabilitation works), b) Instrumentation plan (for new dam construction and dam rehabilitation works) c) operation and maintenance plan, and d) emergency preparedness plan. - e)	a. Construction supervision and quality assurance plan: prior to bid tendering. b. Instrumentation Plan: prior to bid tendering c. Operation & Maintenance Plan: six months prior to first filling of reservoir for new dams and filling of reservoir for existing dam rehabilitation. d. Emergency Preparedness Plan: twelve months prior to first filling of reservoir for new dams and filling of reservoir for existing dam rehabilitation.	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
5.1	RESETTLEMENT FRAMEWORK 1. Adopt and implement, for the AF, the Resettlement Policy Framework (RPF) prepared for the Project, consistent with ESS5. 2. Adopt, update as required, and implement a Resettlement Action Plan (RAP) or a Livelihood Restoration Plan (LRP) for each activity under the Project for such RAP or LRP is required, as set out in the RPF and consistent with ESS5. 3.Each state Deposit funding allocated for the RAP implementation for each impact location in designated RAP account. 4. Submit compensation and resettlement assistance payments completion report to the Association’s clearance prior to commencing civil works at each impact site/location	1. Adopt and implement the RPF throughout Project implementation. 2. Prepare and implement the respective RAP/LRP prior to carrying out the relevant works, including ensuring that before taking possession of the land and related assets, full compensation has been provided and displaced people have been resettled and moving allowances have been provided.	PMUs at State level
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	Assess biodiversity risks of the proposed subprojects in accordance with the screening tools provided in the ESMF, and, if needed based on the screening results, prepare, adopt and implement site specific Biodiversity Action Plans (BAP) and Biodiversity Management Plans (BMP), consistent with ESS6	As part of ESIAs and ESMPs prior to commencement of activities and thereafter implement BAP throughout the project implementation	
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	INDIGENOUS PEOPLES [FRAMEWORK] [PLAN] or [PLANS] Not relevant to this Project		
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Conduct civil works sites screening under the ESIA/ESMPs and if sites or features are identified, cultural heritage management plan or plans shall be prepared and implemented, consistent with ESS8.	Before commencement of any civil works	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
8.2	CHANCE FINDS Adopt and implement the chance findings procedures specified in the ESMF and ESMPs for the Project. All construction contracts will include a “Chance Find” clause which will require contractors and their subcontractors to stop construction in the event that cultural property sites are encountered during construction	Implement chance find procedures starting from the commencement of subproject activities and implement measures throughout Project implementation As part of the bidding, contracting, and supervision processes throughout project implementation	
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
9.1	ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS) Not relevant to this project		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN Update 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.	Update SEP prior to AF Appraisal and implement throughout Project implementation	
10.2	PROJECT GRIEVANCE MECHANISM Strengthen the e-Grievance Management (e-GM) platform to align it with national SERVICOM platform. Thereafter, publicize, maintain, operate, make accessible the grievance mechanism, and ensure it is equipped 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 E-GM 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.	Not later than 3 Months after AF Effective Date and thereafter maintain and operate the E-GM throughout Project implementation	PMU at Federal level

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
INDICATORS FOR IMPLEMENTATION READINESS [This subsection lists the ESCP actions (by their numbering in the first column of the ESCP) that are identified as relevant to monitor project readiness from an E&S standpoint. These may include actions related to: i) establishment of E&S risk management units in the Project Implementation Entities, ii) recruitment and training of E&S staff within Project Implementation Entities, iii) Memorandums of Understanding or other written agreements/arrangements between Project Implementation Entities and other concerned agencies to ensure proper coordination of E&S risk management activities; iv) E&S effectiveness or disbursement conditions, if deemed warranted, v) ES assessments and plans to be prepared by the Borrower at the onset of implementation; vi) other project-specific requirements related to E&S readiness for implementation].		
The following actions are indicators for implementation readiness: Action 1.1 Action 4.4 Action 4.5 (Dam Safety) Action 10.1 Action 10.2		