

Government of Tanzania

Land Tenure Improvement Project (P164906)

DRAFT ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP) DRAFT V1

February 2020

UNITED REPUBLIC OF TANZANIA
LAND TENURE IMPROVEMENT PROJECT (P164906)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

The United Republic of Tanzania (herein after referred to as the Government) is preparing a Project – Land Tenure Improvement Project (LTIP) P164906. The government plans to implement LTIP under the leadership of the Ministry of Lands Housing and Human Settlement Development (MLHSD). The World Bank (herein after referred to as the Bank) has agreed to provide funding for the project.

The Government will implement material measures and actions so that the Project is implemented in accordance with the World Bank Environmental and Social Standards (ESSs). This Environmental and Social Commitment Plan (ESCP) sets out a summary of the material measures and actions.

1. Where the ESCP refers to specific plans or other documents, whether they have already been prepared or are to be developed, the ESCP requires compliance with all provisions of such plans or other documents. In particular, the ESCP requires compliance with the provisions set out in the Stakeholder Engagement Plan (SEP), Environmental and Social Management Framework (ESMF), Resettlement Policy Framework (RPF) and Vulnerable Groups Planning Framework (VGPF) which have been developed for the Project, as well as other specific instruments as needed, such as Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs), Resettlement Action Plans (RAPs), Vulnerable Groups Plans, etc.
2. The table below summarizes the material measures and actions that are required as well as the timing of the material measures and actions. The Government is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministries, agency or unit referenced in paragraph 1 above, including the LTIP Project Coordination Unit (PCU).
3. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by the Government as required by the ESCP and the conditions of the legal agreement and the Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
4. As agreed by the Bank and the Government, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Government will agree to the changes with the Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters between the Bank and the Government. The Government will promptly disclose the updated ESCP on the project website that has been agreed with the MLHSD to create and maintain for the project lifecycle to hold all project and environmental and social documents (including but not limited to the SEP, ESMF, RPF, VGPF, ESIA, ESMP, RAP and other documents). The ESCP may also specify the funding necessary for completion of a specific measure or action.
5. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Government shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include risks and impacts that are relevant to the Project, such as environmental, health, and safety impacts; risks of degradation of natural resources; environmental pollution (air, land and water pollution); pollution due to worksite activities and waste; risks of social conflicts in the event of non-local employment or non-compliance with habits and customs; community

health and safety risks (risks of development of health issues among communities and workers); risks of accidents related to worksite activities; risks of land loss; risks for the vulnerable groups in the area; risks of gender-based violence (sexual harassment, rape, unwanted pregnancies among the beneficiary populations, etc.); and risks of child labor.

6. As agreed by the Bank and the Government in the legal agreement, the implementation and application of this ESCP and related ESF instruments prepared for the project are mandatory and it is the responsibility of the implementing units, being MLHSD, regional, district and other agencies involved in the execution of the project to ensure its adoption, implementation, application and monitoring throughout the lifetime of the project, as well as transferring these obligations into the contracts of consultants, contractors, builders, and any other servant that will implement or collaborate with project implementation.

LAND TENURE IMPROVEMENT PROJECT (LTIP) ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (v1)					
<i>Summary of the Material Measures and Actions to Mitigate the Project's Potential Environmental and Social Risks and Impacts</i>		<i>Timeframe</i>	<i>Responsibility / Authority and Resources/Funding Committed</i>	<i>Date of Completion</i>	
ESCP Monitoring and Reporting					
MR1	REGULAR REPORTING: The Government, through the PCU notably the ESMU, will prepare and submit to the Bank regular environmental, social, health and safety (ESHS) monitoring reports presenting the state of compliance with the actions set out in this ESCP and, particularly, in relation to the preparation and implementation of the environmental and social management tools and actions, stakeholder engagement activities and functioning of the grievance mechanisms.	<i>Quarterly Reporting (every 3 months)</i>	<i>LTIP Project Coordination Unit (PCU)</i> <i>Funding from the Project budget¹</i>	<i>Throughout Project implementation</i>	
MR2	INCIDENTS AND ACCIDENTS NOTIFICATION: The Government will promptly notify the Bank of any incident or accident related to or having an impact on the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including risks based on the environmental and social assessments. Indicative examples include Project-related fatalities (workers or community); project-related allegations of gender-based violence; significant environmental degradation; and significant conflict over land rights. The Government will provide sufficient detail regarding the	<i>Immediately, and no later than 48 hours after taking knowledge about such accidents or incidents, report to the Task Team Leader of the Bank</i>	<i>LTIP Project Coordination Unit (PCU)</i> <i>Funding from the Project budget.</i>	<i>Throughout Project implementation</i>	

¹ Funding from the Project Budget means that the allocation will be from Component 4 to cover the expenses needed for the full implementation of the ESCP.

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	incident or accident, indicating immediate measures taken or planned to be taken to address it, and will include information provided by any contractor or supervising entity, as appropriate. Subsequently, at the Bank's request, the Government will prepare a report on the incident or accident and propose any measures to prevent its recurrence.			
MR3	CONTRACTORS MONTHLY REPORTS: The construction contractors will submit monthly reports to the Supervision Consultants covering Environmental and Social Risks including EHS issues. These will be reviewed, commented on and approved by the Supervision Consultant. The Supervision Consultants will compile these reports and prepare a summary outlining any key issues which will be provided to the PCU and the World Bank.	Monthly —	Contractors to develop monthly report Supervision Consultant to review and consolidate PCU to review and share Contractor and Supervision Consultant Budget	Throughout the Duration of Construction
SUMMARY ASSESSMENT				
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS				
1.1.1	ORGANIZATIONAL STRUCTURE: The Government will create and maintain, an organizational structure to support environmental and social risk management. The PCU will have overall	The LTIP Project Coordination Unit (PCU) will be	Ministry of Lands Housing and Human Settlement	Throughout Project implementation

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	responsibility for coordinating project implementation, including environmental and social management.	<i>established within 3 months of Project Effectiveness.</i>	<i>Development to establish PCU.</i>	
1.1.2	The Government will establish an Environmental and Social Management Unit (ESMU) consisting of: <ul style="list-style-type: none"> • 1 Environmental Specialist hired by the Government; • 1 Social Specialist hired by the Government; • 1 GBV/SEA specialist consultant who will be contracted to support the project; and • 2 MLHSD Officers (1 environment and 1 social) transferred to the Project. The environmental and social specialists will be responsible for increasing the capacity of the MLHSD environmental and social officers. They will also support with the preparation and implementation of the environmental and social instruments developed for LTIP.	<i>The LTIP ESMU will be established within 3 months of Project Effectiveness.</i>	<i>PCU</i>	<i>Throughout Implementation</i>
1.1.3	At the District level, an Environmental Officer and Community Development Officer will act as the field supervisors and will be responsible for overseeing environmental and social issues under the guidance of the ESMU. The Project will transfer or hire additional Environmental Officers and Community Development Officers to support	<i>Prior to commencement of any activities in a District/construction activities</i>	<i>PCU</i> <i>Funding from the Project budget</i>	<i>Throughout Project implementation</i>

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	<p>implementation in the Districts as needed based on the implementation schedule.</p> <p>In the Urban Areas, contracted private firms will be required to include an Environmental Officer and a Community Development Officer as key staff in their team.</p> <p>The construction contractors will hire an Environmental, Health and Safety and Social (EHSS) Manager to oversee the day to day construction activities and ensure compliance with the Environment and Social Instruments prepared. A Supervision Consultant will be hired to oversee construction of the office buildings. The supervision consultant will be required to include as key staff one Environmental, Health and Safety (EHS) Specialist and one Social Specialist to ensure compliance with the Project environmental and social instruments, including health and safety at construction sites.</p>			
1.1.4	<p>The Government will ensure, by means of the PCU, that the ESMU conduct their environmental and social management tasks for the Project including:</p> <ul style="list-style-type: none"> disseminating the ESMF, the SEP, VGPF and the RPF (as needed) to key stakeholders; engaging with the National Environmental Management 	<i>Disseminating existing Environmental and Social instruments (ESMF, RF, VGPF, SEP) as early as possible and by Project</i>	<i>PCU Funding from the Project budget</i>	<i>Throughout Project implementation</i>

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	<p>Council (NEMC);</p> <ul style="list-style-type: none"> • supervising production of the required instruments (Environmental and Social Management Plans (ESMPs), Resettlement Action Plans (RAPs), Vulnerable Groups Plans, etc.); • checking the incorporation of the environmental and social measures into tender/contracts documents and works; • monitoring effective implementation of the measures; • drafting the quarterly reports to be sent to the Bank; • implementing the GBV mitigation measures; and • producing the environmental and social aspects of the procedures manuals and ensuring implementation. 	<p><i>appraisal</i></p> <p><i>ESIA / ESMP, RAPs, VGPs will be prepared as required pursuant to the terms of the ESMF, RPF and VGPF, disclosed, consulted on and cleared by the Bank prior to implementation of activities</i></p>		
1.1.5	<p>The Government will ensure training of staff at the national, LGA and local level will be undertaken on the ESF as outlined in the relevant environmental and social management frameworks. The training will be developed and implemented by the ESMU. This will include the development of training materials, capacity building workshops and on the ground support.</p>	<p><i>Training must be prior to the implementation of any activities in an LGA</i></p>	<p><i>PCU</i></p> <p><i>Funding from the Project budget.</i></p>	<p><i>Throughout Project implementation</i></p>
1.2.1	<p>STAKEHOLDER ENGAGEMENT FORUM: The PCU will convene a national level Stakeholder Engagement Forum within the first 6 months and at least every 6 months thereafter to discuss the Project as described in the ESMF and SEP. Members of the forum will include, but are not limited to, representatives from the</p>	<p><i>Within the first 6 months of Project implementation and then every 6 months thereafter</i></p>	<p><i>PCU</i></p>	<p><i>Throughout Project implementation</i></p>

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	MLHSD, other ministries, CSOs (covering environmental, social and land issues), LGAs and political representatives.			
1.2.2	The Government will ensure that at the District level a Multi Stakeholder Group will also be established and will meet at least four times while the Project is being implemented in the District. Participants will include the PCU, Regional, District and local officials, political leaders and locals CSOs.	<i>When entering a new District, at least two meetings while operating in the District and one meeting 2 months prior to leaving the District.</i>	<i>PCU – District Field Officer</i>	<i>Throughout Project Implementation.</i>
1.3.1	<p>ADDITIONAL STUDIES: The Government will ensure that the following additional studies will be undertaken to guide the implementation of the Project:</p> <ol style="list-style-type: none"> 1. Guidance note on Pastoralist Community / Hunter Gatherer participation in VLUP and systematic mass registration. 2. Guidance note on women's land rights in polygamous households. 3. Options paper on conversion of Village Land to General Land including conversion of rights, management of land, vacant land, etc. 4. Options paper on delivering post registration services at the local level. 5. Options paper on renewal and conversion of Residential 	<i>During Project Implementation</i>	<p><i>PCU</i></p> <p><i>Funding from the Project budget</i></p>	<p><i>The specialist studies will be completed as follows:</i></p> <p><i>1-2 in the first 6 months</i></p> <p><i>3 in the first 18 months</i></p> <p><i>4-6 by year 3</i></p>

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	Licenses. 6. Options paper on institutional framework for land use planning.			
1.4.1	ENVIRONMENTAL AND SOCIAL ASSESSMENT: Environmental and social assessments (ESIA or ESMP as needed) will be undertaken for the construction of 26 Regional Office Buildings and the Archives Building in Dodoma as well as the rehabilitation of up to 12 District Land Offices. This will require the identification and assessment of environmental, health and safety and social risks and impacts and the development and implementation of appropriate mitigation measures. Development and implementation of the assessments will follow the steps defined in the ESMF to comply with the ESF and National regulations.	<i>Prior to Construction of New Office Buildings</i>	<i>PCU via the ESMU Funding from the Project budget</i>	<i>End of Year One</i>
1.3.2	A screening process will be undertaken to inform the selection of villages and urban areas for inclusion. The screening process will require the identification of social (vulnerable groups, stock routes, etc.) and environmental constraints (border with protected areas, hazardous land, etc.) as outlined in the ESMF to avoid encroachment into culturally and ecologically sensitive areas.	<i>Identification of Project Sites</i>	<i>PCU via the ESMU/ District Field Coordinators Funding from the Project budget</i>	<i>Throughout Project Implementation</i>
1.4	MANAGEMENT TOOLS AND INSTRUMENTS: As and when required pursuant to the ESMF, RPF, VGPF and SEP, specific	<i>Disclosure, consultation and Bank</i>	<i>PCU</i>	<i>Implementation of the management tools and</i>

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	<p>Environmental and Social Impact Assessment (ESIA) and/or Environmental and Social Management Plans (ESMP), Resettlement Action Plans (RAP), Voluntary Land Donation Procedures and Vulnerable Groups Plans (VGP), will be developed and implemented.</p> <p>These plans will be disclosed on the project website and disseminated in the district, village, community, and to all staff and stakeholders involved in project implementation.</p>	<p><i>clearance of the SEP, ESMF, VGPF and RPF by Project appraisal</i></p> <p><i>Disclosure, consultation and Bank clearance of ESIA's, ESMPs, RAPs, VGPs, as required pursuant to the ESMF, RPF or VGPF, before the start of any activity requiring the preparation of a specific E&S instrument.</i></p> <p><i>Before engaging works contractors</i></p>	<p>LGA</p> <p><i>Funding from the Project budget</i></p>	<p><i>instruments required throughout Project implementation.</i></p>
1.5	<p>MANAGEMENT OF CONTRACTORS: The Government will require the implementation of the following procedures by contractors and subcontractors which will be included in their contracts:</p> <ul style="list-style-type: none"> • Site-specific ESMPs to be provided in ToR/contracts to builders which are approved by the client and are 	<p><i>Before engaging works contractors</i></p>	<p>LTIP Project Coordination Unit (PCU)</p> <p><i>Contractors budget for</i></p>	<p><i>As required, but development finalized before signing the contract with the contractor</i></p> <p><i>Implementation of these</i></p>

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	satisfactory to the Bank. <ul style="list-style-type: none"> • Social commitments on child labor and GBV • Labour management procedures • Procedures to ensure Environment, Health and Safety (EHS). • Workplan and Timeline • Standard working procedures/methodologies • Presentation of monthly reports on accidents, grievances and any other issues affecting construction (lack of water, permits delay, etc). The Government will ensure that all procurement contracts require compliance by contractors and subcontractors with the ESF and with the Project management tools and instruments.	—	<i>the Project (needs to be reflected in their financial and technical proposal)</i>	<i>actions, throughout Project implementation</i>
1.6	PERMIT, CONSENTS AND AUTHORIZATIONS: The Government will obtain or assist in obtaining, as appropriate, the permits, consents and authorizations that are applicable to the Project from relevant national authorities, pursuant to applicable national laws and comply with the same. The permits to be produced may include: <ul style="list-style-type: none"> • EIA Certificate from National Environmental Management Committee (NEMC); • land use title; • building permit; • water and discharge permits; and 	<i>Before the start of works to which the respective permits apply</i>	ESMU <i>Funding from the Project budget (for permits to be obtained by the Government) or from the budget of entities obtaining such permits (e.g. contractors)</i>	<i>Throughout Project implementation</i>

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	<ul style="list-style-type: none"> others as required. 			
1.7	<p>PROJECT MANUALS: The environmental and social mitigation measures will be included in the project field manuals including key intervention points, guidance on activities to be undertaken, timing of those activities and responsibilities.</p> <p>The CRO manual will be completed 12 months after effectiveness to include relevant information following completion of the pilot projects in urban areas.</p>	<p><i>The CCRO Field Manual will be produced prior to effectiveness.</i></p> <p>—</p> <p><i>CRO Manual 12 months after effectiveness</i></p>	<p><i>PCU including technical teams and ESMU</i></p> <p><i>Funding from Project Budget</i></p>	<p><i>Manuals to be completed within one year of effectiveness and implemented throughout the Project.</i></p>
ESS 2: LABOR AND WORKING CONDITIONS				
2.1	<p>LABOR MANAGEMENT PROCEDURES: The Government will implement labor management procedures consistent with national legislation and ESS2. These procedures are set out in the Environmental and Social Management Framework.</p> <p>Contracts with construction companies, facilitators and consultants will include: working conditions requirements consistent with national law and ESS2; a code of conduct and a requirement for workers (including sub-contractors) to be made aware of the same; and for workers to be provided with written contracts. Child labor (under the age of 18) and forced labor is</p>	<p><i>Throughout Project Implementation</i></p>	<p><i>ESMU</i></p> <p><i>Funding from the Project budget</i></p>	<p><i>Throughout Project implementation</i></p>

	prohibited on the Project.			
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS: Contractors will be required to develop and implement a workers Grievance Redress Mechanism covering their employees and any subcontractors.</p> <p>The grievance redress mechanism will allow for escalation of grievances to the ESMU in the PCU. This mechanism will not prevent access to judicial remedies as needed.</p>	<i>Prior to commencing project activities.</i>	<p>ESMU</p> <p>Contractors to fund</p>	<i>Established upon contract award and maintained throughout Project implementation</i>
2.3	<p>OHS MEASURES: The Government will ensure that Project contractors, consultants and facilitators develop and implement an Occupational, Health and Safety (OHS) Plan in line with the risks faced by the workers and implement the same.</p>	<i>Throughout Project implementation and prior to commencement of works by respective Contractors.</i>	<p>ESMU</p> <p>Contractors</p> <p>Funding from contractor budget</p>	<i>Throughout Project implementation</i>
2.4	<p>EMERGENCY PREPAREDNESS AND RESPONSE: Contractors will develop Emergency Preparedness and Response Plans (EPRP) for workers as needed. The Government will immediately report to the Bank any major emergencies (e.g. spills, earthquakes, accidents causing major damage or impact to the people or work).</p>	<i>Prior to commencing project activities.</i>	<p>ESMU</p> <p>Contractors</p> <p>Funding from contractor budget</p>	<i>Throughout Project implementation</i>
2.5	<p>PROJECT WORKERS TRAINING: The ESMU will ensure that all workers are trained on relevant environmental and social issues including worker rights, OHS, codes of conduct, GBV mitigation, community sensitization, community interactions, grievance redress mechanisms and environmental controls.</p>	<i>Prior to commencing project activities and throughout Project implementation</i>	<p>ESMU</p> <p>Funding from the Project budget</p>	<i>Throughout Project implementation</i>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT				

3.1	MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS: The Government will develop measures and actions as part of the site-specific ESIA/ ESMP to manage waste and hazardous materials during construction of office buildings.	<i>Prior to commencing work on the Project.</i> <i>Throughout Project implementation</i>	<i>PCU</i> <i>Funding from the Project budget</i>	Throughout Project implementation
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT: The ESIA's and / or ESMPs will include measures to ensure resource efficiency and prevent and reduce pollution during construction and operation to avoid negative impacts to the environment and communities as outlined in the ESMF.	<i>Prior to commencing work on the Project.</i> <i>Throughout Project implementation</i>	<i>PCU</i> <i>Funding from the Project budget</i>	Throughout Project implementation
ESS 4: COMMUNITY HEALTH AND SAFETY				
4.1	TRAFFIC AND ROAD SAFETY: The Government will ensure the use of competent and well-trained drivers; that vehicles are well maintained; and that the rules of the road in Tanzania are abided by for all vehicle movements associated with the Project.	<i>Implementation when work starts</i>	<i>ESMU</i> <i>Supervision Consultant</i> <i>Funding from the Project budget</i>	<i>Throughout Project implementation</i>
4.2	COMMUNITY HEALTH AND SAFETY: The Government will ensure that Project workers implement measures and actions to manage risks and impacts to the community arising from Project activities consistent with the requirements in the ESF and ESMF to prevent and avoid: traffic accidents, disease transmission etc. including training and awareness raising and use of codes of conduct.	<i>Implementation when work starts</i>	<i>ESMU</i> <i>Supervision Consultant</i> <i>Funding from the Project budget</i>	<i>Throughout Project implementation</i>
4.3	STRUCTURAL SAFETY: The Government will develop a ToR which is satisfactory to the Bank which includes requirements for buildings to be structurally sound and provide universal access in line with the requirements of the ESF. Detailed designs proposed by the Design Consultant will also be reviewed by the Bank (following approval from the Government) to determine if they meet the requirements of the ESF prior to contracting.	<i>Review of ToR – prior to release of bidding documents</i> <i>Review of Design Drawings – prior to contracting</i>	<i>PCU</i>	<i>Prior to Construction of Office Buildings</i>
4.4.1	GBV RISKS: A GBV Action Plan will be developed which will be implemented in all districts and will include prevention and	<i>Action Plan to be developed prior to</i>	<i>ESMU</i>	<i>Throughout Project implementation</i>

	response measures as outlined in the ESMF.	<i>commencing activities in a district</i>	<i>Funding from the Project budget</i>	
4.4.2	Contractors, facilitators and consultants will be trained on and required to signed codes of conduct which include clauses related to GBV.	<i>Codes of conduct signed by project workers, training in place at the district level prior to beginning works.</i>	<i>ESMU Funding from the Project budget</i>	<i>Throughout Project implementation</i>
4.5	EMERGENCY PREPAREDNESS AND RESPONSE MEASURES: The Government will prepare and implement Emergency Preparedness and Response and Plans (EPRP) in line with the ESMF for the community. The EPRP will document the government’s emergency preparedness and response activities, resources, and responsibilities associated with project activities.	<i>Implementation when work starts</i>	<i>ESMU Funding from the Project budget</i>	<i>Throughout Project implementation</i>
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT				
5.1	RESETTLEMENT IDENTIFICATION: For the construction of office buildings resettlement impacts will be identified during site screening as outlined in the ESMF. For land regularization identification of potential resettlement impacts will be determined during land use planning noting this may be through either voluntary land donations or compensation.	<i>Office Buildings: Pre-construction Regularization: During land use planning</i>	<i>ESMU LGA Community Development Officer PLUM/VLUM Funding from the Project budget</i>	<i>Throughout Project implementation</i>

5.2	RESETTLEMENT PLANS: As required, the Government, via the LGA supported by the PCU, will develop and implement resettlement action plans consistent with the requirements of the RPF, ESS5 and national legislation, including the implementation budget and support for resettlement.	<i>RAP disclosed, consulted on and cleared by the Bank prior to commencing the Project activities requiring resettlement.</i>	ESMU LGA – Community Development Officer RAP Development to be funded by Project RAP Implementation to be funded by Government	<i>Throughout Project Implementation</i> <i>For any given household prior to any land take</i>
5.3	VOLUNTARY LAND DONATION: As required the Project will implement the Voluntary Land Donation (VLD) Procedures outlined in the RPF ensuring that project affected people are fully informed and consulted and are aware of their rights in relation to VLD. The project will ensure that no land is donated contrary to the requirements presented in the RPF and ESS5.	<i>VLD Procedure completed and cleared by the Bank prior to land take</i>	ESMU LGA Community Development Officer PLUM/VLUM Funding from the Project budget	<i>Throughout Project implementation</i>
5.3	MONITORING AND REPORTING: The Government, via the PCU, will undertake monitoring and quarterly reporting on land acquisition and resettlement activities (including VLD) against the indicators included in the RPF.	<i>Quarterly Monitoring Reports.</i>	ESMU LGA Community Development Officer PLUM/VLUM Funding from the Project budget	<i>Throughout Project implementation</i>
5.4	GRIEVANCE MECHANISM: The Government, via the ESMU, will ensure that the RAPs include details on the Grievance	<i>Prior to commencement of</i>	ESMU	<i>Throughout Project implementation</i>

	Mechanism, which will also be available to receive any Project-related resettlement complaint and feedback. The Government will maintain operational GRMs and records throughout the lifetime of the Project as outlined in the RPF.	<i>resettlement activities and throughout resettlement implementation.</i>	<i>LGA Community Development Officer PLUM/VLUM Funding from the Project budget</i>	
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES				
6.1.2	BIODIVERSITY RISKS AND IMPACTS: The Government will ensure that the site-specific ESMPs for construction activities will include measures to prevent the supply of materials from unauthorized natural resource areas during implementation.	<i>Prior to construction. Throughout Project implementation</i>	<i>PCU Funding from the Project budget</i>	Throughout Project implementation
6.1.2	The Government will undertake a screening exercise to identify any biodiversity risks associated with undertaking certification activities in rural and urban areas. This will include determining the nature and extent of any common boundary with a protected area and if such that it is clearly defined to determine suitability as described in the ESMF.	<i>Site Selection</i>	<i>PCU Funding from the Project budget</i>	Throughout Project implementation
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES				
7.1	PRESENT OR COLLECTIVELY ATTACHED TO PROJECT AREA: Screening will be undertaken to determine the presence of or potential impacts to one or more of the Vulnerable Groups (VGs) which have been identified in the VGPF as a result of project activities.	<i>Prior to commencing work on the Project in an LGA Throughout Project implementation</i>	<i>PCU ESMU LGA- Community Development Officer Funding from the Project budget</i>	Throughout Project implementation
7.2	VULNERABLE GROUPS PRESENT OR COLLECTIVELY ATTACHED TO PROJECT AREA: The Government will conduct social studies to assess the nature and degree of the Project's direct and indirect impacts on Vulnerable Groups who are present in, or have collective attachment to, the project area and to understand	<i>Prior to commencing work on the Project. Throughout Project implementation</i>	<i>ESMU LGA Funding from the</i>	Throughout Project implementation

	their existing and traditional uses of land.		<i>Project budget</i>	
7.3	VULNERABLE GROUP PLAN (VGP): The Government, through the PCU, will develop and implement VGPs consistent with the requirements of the VGPF and ESS7.	<i>Disclosure, consultation and clearance by the Bank of VGP(s), and subsequent implementation, as and when required under the VGPF throughout the lifetime of the Project</i>	ESMU Funding from the Project budget	Throughout Project implementation
7.4	GRIEVANCE MECHANISM: The Government, via the PCU, will ensure that VGs have access to the Project Grievance Mechanism. If necessary, the VG could include a functional process/grievance mechanism adapted to the specific requirements of the vulnerable groups living near the sub-project sites as described in the VGPF and SEP.	<i>Throughout the Project duration</i>	ESMU <i>Funding from the Project budget</i>	Throughout Project implementation
ESS 8: CULTURAL HERITAGE				
8.1	CHANCE FINDS: The Government will implement a Chance Finds Procedure on all projects as outlined in the ESMF. This will be included in all construction contracts.	<i>Throughout the Project duration</i>	ESMU LGA Environmental Officer and District Engineer Funding from the Project budget	Throughout Project implementation
ESS 9: FINANCIAL INTERMEDIARIES				
	Not relevant.			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE				
10.1	SEP IMPLEMENTATION: The Government will ensure	<i>SEP updated following</i>	ESMU	Throughout Project

	implementation of the SEP for all project components in accordance with the provisions of ESS10. The SEP will be amended and updated (and redisclosed) during project implementation to include additional information on the approach to engagement during regularization and formulization once the Project Field Manuals have been prepared and following the outcomes of the pilot projects in urban areas.	<p><i>completion of Field Manuals</i></p> <p><i>SEP updated following implementation of pilot studies in urban areas (end of year one)</i></p> <p><i>Maintained throughout Project implementation</i></p>	<i>Funding from the Project budget</i>	implementation
10.2	PROJECT GRIEVANCE MECHANISM: The Government will ensure that the arrangements for the Grievance Redress Mechanisms (GRMs) covering general grievances (for the project) and land grievances (associated with processes for CROs, CCROs and RLs) described in the ESMF and the SEP are implemented for all project components.	<p><i>Prior to commencement of the Project activities.</i></p> <p><i>Maintained throughout Project implementation</i></p>	<p><i>ESMU</i></p> <p><i>Funding from the Project budget</i></p>	<p>Throughout Project implementation</p> <p>Monthly Grievance Redress Report throughout the Project</p>
Capacity Support				
Specify Training to be provided		Targeted Groups and Timeframe for Delivery	Training Completed	
The Government, with support of third-party resources as needed (independent experts, NGOs, etc.) to be identified before implementation of capacity support initiatives, will design and implement training for targeted groups involved in the Project to improve their awareness of risks and mitigate the impacts. This ESCP proposes a preliminary training plan covering the following topics. This plan will be adapted to meet needs during Project implementation.				
<p>-Training on National laws and regulations and World Bank (WB) ESF</p> <p>-Introduction to Land registration processes and mass certification</p>		PCU, Other members of MLHSD, Private companies, LGAs and NEMC	To be undertaken during the first year of project implementation with annual refresher/updates	

<p>-Methods for impact identification and evaluation and preparation of environmental and social management plans (ESMP) in land registration activities and ILMIS building office construction in zonal areas/District</p> <p>-Introduction to Environmental and Social issues in the construction industry, Regularization and formalization processes</p>		
<p>-Public consultation and stakeholder engagement (SEP) in in land registration activities and ILMIS building office construction</p> <p>-Environmental and Social safeguard due diligence using ESF</p> <p>-ESIA review and supervision of ESIA consultants</p> <p>-Contract management (Inclusion of E&S issues in tender documents, Bid evaluation and management of contractors);</p>	<p>PCU, Private companies, LGAs and NEMC</p>	<p>To be undertaken during the first year of project implementation with annual refresher/updates</p>
<p>-Training on Screening for project activities</p> <p>-Environmental Management of Building Construction, regularization and formalization processes</p> <p>-Community engagement and social protection and inclusion in land registration processes and building construction</p> <p>-Training on Geo-spatial Information Systems (GIS) for environmental application;</p>	<p>PCU, Private companies, LGAs and NEMC</p>	<p>To be undertaken during the first year of project implementation with annual refresher/updates</p>
<p>-Gender considerations in land registration, gender discrimination, gender-based violence and prevention of</p>	<p>PCU, Private companies, LGAs, NGOs and CBOs.</p>	<p>To be undertaken during the first year of project implementation with annual refresher/updates</p>

<p>sexual exploitation and abuse in development projects;</p> <ul style="list-style-type: none"> -Labor influx and/or project induced in-migration management and their resulted gender-based violence -Formation and operation of GRM/GRC -EHS issues in land registration processes and building construction 		
<p>Capacity building will be undertaken for MLHSD staff through the hiring or transfer of one Environmental Expert and one Social Expert and contracting a GBV expert consultant into the ESMU which is being established for the Project to support implementation. These experts will provide on-the-job training and capacity building for existing MLHSD staff as well as District Officials.</p>	<p>MLHSD environmental expert and community development staff. District Environmental Officer and Community Development Officers.</p>	<p>Throughout Project implementation.</p>