



UNION OF THE COMOROS



Ministry of Maritime and Air Transport

Comoros Interisland Connectivity Project (PICMC) (SOP2)

P179109

Appraisal Draft ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

January 28, 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Union of the Comoros (the **Recipient**) will implement the Comoros Interisland Connectivity Project (P179109) (PICMC, the Project or SOP2) with the involvement of the Ministry of Maritime and Air Transport (MMAT), as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide financing for the Project.

2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meaning given to them in the referred agreement.

3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during the Project implementation, to reflect the adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Ministry of Finance Recipient. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of environmental and social instruments required under the ESCP, stakeholder engagement activities and functioning of the Grievance Mechanism(s) including those related to resettlement and cases of Sexual Exploitation and Abuse//Sexual Harassment (SEA/SH), and Violence Against Children.</p>	<p>Submit quarterly reports to the Association starting 6 months after the Effective Date and throughout the implementation of the Project and in coordination with the report on the status and results of the Project. Submit each report to the Association no later than 5 days after the end of each reporting period.</p> <p>An annual compilation of the quarterly reports shall be sent to the Association no later than the 10th of January following the year under review.</p>	PICMC PIU within MMAT
B	<p>INCIDENTS AND ACCIDENTS</p> <ol style="list-style-type: none"> Promptly notify the Association of any incident or accident, related to the Project, which has, or are likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injuries. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate. Subsequently, at the Association's request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence. The Recipient shall require suppliers and service providers to notify it of accidents and incidents in accordance with this ESCP, including through an incident template or accident notification form. 	<ol style="list-style-type: none"> Notify the Association no later than 48 hours after learning of the incident or accident (24 hours in the case of SEA/SH incidents). Provide subsequent report to the Association within a week of learning of the incident or accident. Throughout Project implementation. 	PIU within MMAT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
C	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts, and submit such reports to the PIU within MMAT. The PIU within MMAT should produce a consolidated six-month monitoring reports on ESHS performance to the Association, upon request.</p>	Submit the consolidated six-month reports to the Association upon request and as annexes to the reports to be submitted under action A above.	PIU within MMAT
ESS1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <ol style="list-style-type: none"> 1. Establish and maintain a Project Implementation Unit (PIU) within MMAT with qualified staff and resources to support management of ESHS risks and impacts of the Project including three (3) E&S specialists (one environmental specialist, one social specialist, and one gender and SEA/SH specialist). 2. Cooperate with the Authority of Environment and Forests (DGEF) and its island entities, non-governmental organizations (NGOs), companies and engineering and control offices, and municipalities for the monitoring and evaluation of environmental and social measures. 	<ol style="list-style-type: none"> 1. The PIU that was already established under SOP1 with operational E&S specialists will be maintained for SOP2 and be retained throughout the implementation of the Project. 2. Cooperation with other relevant agencies shall be undertaken throughout Project implementation. 	PIU within MMAT
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <ol style="list-style-type: none"> 1. Adopt and implement the Environmental and Social Management Framework (ESMF). 2. Adopt and implement an Environmental and Social Impact Assessment (ESIA) including Environmental and Social Management Plan (ESMP) for the infrastructure improvement of Port Boingoma under Part 1 of the Project. 	<ol style="list-style-type: none"> 1. The SOP1 ESMF remains valid for the activities under SOP1 AF and SOP2. It was published on January 12, 2022. ESMF shall be implemented throughout the duration of the Project. 2. The ESIA for the infrastructure improvement of Port Boingoma and ESMP was disclosed in country on January 8, 2022 and to WB external website on January 20, 2022. 	<p>PIU within MMAT</p> <p>PIU within MMAT</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
<ol style="list-style-type: none"> 3. Prepare and adopt an (ESIA/ESMP) for six potential quarries for the construction of Port Boingoma. 4. Prepare, adopt and disclose an ESIA/ESMP for the selected Domoni quarry site, including borrow pits, and the transport corridor following completion of the geotechnical study of Domoni and transport corridor. 5. Prepare, adopt and implement an ESIA/ESMP for selected secondary ports. 6. Ministry of Maritime and Air Transport to prepare Environmental and Social Management System (ESMS) prior to beginning Boingoma and secondary port operations, including Natural Hazard Risk Preparedness Plan and Emergency Response Plan and Ship Ballast Water Management Plan. 	<ol style="list-style-type: none"> 3. The ESIA/ESMP for the six potential quarries was adopted and disclosed on April 19, 2023. 4. The ESIA/ESMP for the Domoni Quarry Site and transport corridor was prepared and shall be approved and disclosed prior to the launch of the works. 5. Adopt and implement the ESIA/ESMP for secondary ports prior to launching work for the secondary ports. 6. ESMS to be prepared prior to start of port operations and maintained throughout operational period of ports. 	<p>PIU within MMAT</p> <p>PIU within MMAT</p> <p>PIU within MMAT</p> <p>PIU within MMAT Ministry of Maritime and Air Transport Port Authority</p>
<p>MANAGEMENT OF CONTRACTORS, SUPPLIERS AND SERVICE PROVIDERS</p> <ol style="list-style-type: none"> 1. Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts, including C-ESMP(s). 2. The C-ESMP for the civil engineering works of Port Boingoma and the Domoni-Hoani quarry site and transport corridor shall be approved by the control and supervision mission and implemented by the contractor. C-ESMP shall include Occupational Health and Safety Plan (OHSP), Community Health and Safety Plan, Traffic Management Plan, Waste Management Plan, Risk Hazard Assessment for civil works, Worker GRM, SEA/SH prevention and response measures, Coral Reef Restoration Plan (in collaboration with RENAP and forestry service). 3. PIU shall cause contractors to prepare a C-ESMP for SOP2 activities including secondary ports, approved by the Association and implemented by the Project 	<ol style="list-style-type: none"> 1. As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. 2. Final version of the C-ESMP for Port Boingoma civil works and the quarry site of Domoni Hoani shall be approved and disclosed prior to the start of the civil works and thereafter implemented throughout Project implementation. 3. Disclose the C-ESMP for SOP2 activities prior to starting the civil works and thereafter implement it throughout Project implementation. 	<p>PIU within MMAT</p> <p>Contractor Supervising Engineer PIU</p> <p>PIU Supervising Engineer Contractor</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
<p>1.3 TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p> <p>The technical assistance activities (operationalization of the Port Authority, Enhancement of Maritime Safety, implementation Support) shall be consistent with the ESSs</p>	<p>The terms of reference for technical assistance activities will be prepared by the project and are pending approval by the association before launching the request for proposal (RP)</p> <p>They will be carried throughout Project implementation.</p>	<p>PIU</p> <p>Port Authority (for port operations)</p>
<p>1.4 EMERGENCY RESPONSE COMPONENT (CERC)</p> <ol style="list-style-type: none"> 1. Ensure that, if applicable, the ESMF will be updated to include a CERC ESMF Addendum for the implementation of CERC component, if needed and activated, in accordance with the ESSs. 2. Adopt any environmental and social (E&S) instruments which may be required for activities under the CERC, in accordance with the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments. 	<ol style="list-style-type: none"> 1. The adoption of the updated ESMF CERC Addendum, as relevant in form and substance acceptable to the Association is a withdrawal condition under Section III of Schedule 2 of the legal agreement for the Project. 2. Adopt any required E&S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation. 	<p>PIU PICMC</p>
<p>ESS2: LABOR AND WORKING CONDITIONS</p>		
<p>2.1 LABOR MANAGEMENT PROCEDURES</p> <ol style="list-style-type: none"> 1, Adopt and implement Labor Management Procedures (LMP) for SOP2 activities, including OHS measures, consistent with ESS2 and in a manner satisfactory to the Association. 2. Cause contractors to prepare, approve and implement all secondary port site-specific procedures under the Contractors ESMP (C-ESMP), based on the LMP prepared for the Project. 	<ol style="list-style-type: none"> 1. The SOP1 LMP was updated for SOP2 and disclosed on April 19, 2023, and further updated for latest SOP2 aspects and disclosed prior to SOP2 negotiations. <p>Thereafter implement the LMP throughout Project implementation.</p> <ol style="list-style-type: none"> 2. Prior to engaging workers for the relevant works. 	<p>PIU PICMC</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>1. Maintain and operate a grievance mechanism (GM) for Project workers, as described in the LMP and consistent with ESS2 and national labor laws.</p> <p>2. Contractor to adopt measures to ensure compliance with project workers GM, include as part of Contractor's C-ESMP</p>	<p>1. The PIU-based workers GM has been established and is operational and shall be maintained throughout Project implementation.</p> <p>2. Establish GM measures as part of the C-ESMP prior to engaging workers, and maintain them throughout duration of the works of secondary ports.</p>	<p>PIU PICMC</p> <p>Contractors</p>
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>Cause contractors to develop and implement Occupational Health & Safety Plans (OHSPs) following the WBG Environment, Health and Safety (EHS) Guidelines (for construction activities) and Industry Sector Guidelines for Construction Materials Extraction. The OHSP shall also include procedures on incident investigation and reporting, recording and reporting of non-compliance, emergency preparedness and response procedures and on-going worker training/awareness.</p>	<p>Develop and approve OHSPs before the commencement of relevant works and implement them throughout Project implementation.</p>	<p>PIU</p> <p>Contractors</p>
ESS3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE AND HAZARDOUS MATERIALS MANAGEMENT</p> <p>1. Adopt and implement a Waste Management Plan (WMP), as part of the ESMPs required under action 1.2 above, to manage hazardous and non-hazardous wastes, consistent with ESS3 and the Recipient's obligations under international treaties.</p> <p>2. Identify waste management procedures in the C-ESMPS prior to the start of activities and ensure compliance with the agreements established between these managers and the project contractors</p> <p>3. Ensure Contractors develop and implement site/specific Non-Hazardous and Hazardous Waste Management Plans.</p>	<p>1. Same timeframe as for the adoption and implementation of the ESMPs under action 1.2 above.</p> <p>2. As part of the C-ESMP.</p> <p>3. Same timeframe as for the adoption and implementation of the ESMP, and included in C-ESMPS.</p>	<p>PIU</p> <p>Contractors</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
3.2.	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMPs and C-ESMPs to be prepared under action 1.2 above.</p>	Same timeframe as for the adoption and implementation of the ESMPs under action 1.2 above.	PIU Contractors
ESS4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>1. Incorporate measures to manage traffic and road safety risks as required in the ESMPs to be prepared under action 1.2 above.</p> <p>2. Cause contractors to incorporate measures to manage traffic and road safety risks in the C-ESMP.</p>	<p>1. Same timeframe as for the adoption and implementation of the ESMPs under action 1.2 above.</p> <p>2. Same timeframe as for the adoption and implementation of the C-ESMP under action 1.2 above.</p>	PIU Contractors
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>1. Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia e.g., behavior of Project workers, risks of labor influx, response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the previously adopted SOP1 ESMF.</p> <p>2. Before the start of the work, the contractors will have to prepare a Community Health and Safety Plan (CHSP) with a detailed analysis of the health and safety risks (see 4.4 below for risks related to the use of security forces at the construction sites, if required). Specific safety measures such as access to site facilities will have to be addressed in these documents.</p>	<p>1. Same timeframe as for the adoption and implementation of the ESMPs under action 1.2 above.</p> <p>2. Same timeframe as for the adoption and implementation of the C-ESMP, CHSP to be prepared before the beginning of physical works</p>	PIU
4.3	<p>SEA AND SH RISKS</p> <p>Adopt and implement a standalone SEA/SH Action Plan, to assess and manage the risks of SEA and SH.</p>	<p>Revised version of the SOP1 SEA/SH Plan prepared and will be approved and disclosed prior to SOP2 negotiations.</p> <p>Same timeframe as for the adoption and implementation of the SOP2 ESMPs.</p>	PIU PICMC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
4.4	<p>SECURITY MANAGEMENT</p> <p>Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, as set out in Security Management Plan and reflected in C-ESMP, guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.</p>	Prior to engaging security personnel and thereafter implemented throughout Project implementation.	PIU Contractor
ESS5: LAND ACQUISITION, LAND USE RESTRICTIONS AND INVOLUNTARY RELOCATION			
5.1	<p>RESETTLEMENT POLICY FRAMEWORK</p> <p>Implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.</p>	<p>The RPF prepared for SOP1 was revised to include the additional funding activities under SOP2 and was, disclosed on April 19, 2023.</p> <p>The RPF shall be implemented throughout Project implementation.</p>	PIU
5.2	<p>RESETTLEMENT ACTION PLANS</p> <p>Adopt and implement Resettlement Action Plan (RAP)) and/or Livelihood Restoration Plans (LRPs) for each activity under the Project for which the RPF requires preparation of such instruments, consistent with ESS5, including the following:</p> <ul style="list-style-type: none"> a) For the Domoni quarry site and transport corridor. b) If required by screening results, RAP(s) and LRP(s) for secondary port sites. 	<p>RAP and LRP for Domoni quarry and transport corridor to be reviewed, cleared, disclosed and implemented prior to works beginning in Boingoma port that require quarry materials.</p> <p>If required, RAP(s) and LRP(s) for the secondary ports shall be prepared, approved and implemented prior to commencement of any physical works for secondary ports.</p>	PIU
ESS6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
<p>RISKS AND IMPACTS ON BIODIVERSITY</p> <ol style="list-style-type: none"> 1. Adopt and implement biodiversity management measures, in line with the ESIA guidelines of Part 1 “Infrastructure improvement of Port Boingoma” as part of the ESIA. 2. Cause contractors to adopt and implement biodiversity measures as part of the C-ESMP. 3. Cause contractors to adopt and implement a coral reef restoration plan in collaboration with RENAP and the forestry services. 	<ol style="list-style-type: none"> 1. Same timeframe as for the adoption and implementation of the Boingoma Port ESIA under action 1.2 above. 2. Same timeframe as for the adoption and implementation of the C-ESMP under action 1.2 above. 3. Adopt prior to the commencement of port operations in the rehabilitated Boingoma port and secondary ports. 	<p>1. PIU PICMC</p>
ESS7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES		
<p>Not relevant</p>		
ESS8: CULTURAL HERITAGE		
<p>CHANCE FINDS</p> <ol style="list-style-type: none"> 1. Describe and implement the chance finds procedures, as part of the ESMF and ESIA/C-ESMP of Part 1 Infrastructure improvement of Port Boingoma consistent with ESS8. 2. Ensure that future specific E&S studies include an assessment of cultural heritage sites in the area of influence of Boingoma port, quarry and transport corridor and secondary ports sub-projects 	<ol style="list-style-type: none"> 1. Same timeframe as for the adoption and implementation of the ESMF, ESIA and C-ESMP under action 1.2 above. 2. During preparation and prior to implementation of project activities. 	<p>PIU PICMC</p>
ESS9: FINANCIAL INTERMEDIARIES		
<p>Not relevant</p>		
ESS10: STAKEHOLDER MOBILIZATION AND INFORMATION		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
10.1	<p>PREPARATION AND IMPLEMENTATION OF THE STAKEHOLDER ENGAGEMENT PLAN</p> <p>Update and implement Stakeholder Engagement Plan (SEP), initially prepared for SOP1, updated and redisclosed for SOP1 AF, and further revised for SOP2 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.</p>	<p>The revised SEP for SOP2 was approved and disclosed on February 6, 2024. The revised SEP will be operational throughout project implementation, and updated annually and as needed when major project developments occur.</p>	<p>PIU PICMC</p>
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	<p>The GM, operational since January 2023, shall be expanded to include the quarry and road transport site as well as secondary port sites before work begins on these sites.</p> <p>Thereafter maintain and operate the mechanism throughout Project implementation.</p>	<p>PIU PICMC</p>
CAPACITY BUILDING (TRAINING)			
	<p>The Recipient shall ensure that training is provided to the Target Groups described in the third column of this section, and include the following topics:</p>	<p>Schedule of training sessions</p>	<p>Target groups</p>

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
RC 1	<p>TRAINING ON ENVIRONMENTAL AND SOCIAL STANDARDS APPLICABLE TO THE PROJECT</p> <p>Training to include, but not limited to:</p> <ul style="list-style-type: none"> • Preparation of Environmental and Social Assessments, • Working and employment conditions, including OHS and emergency preparedness and response, incident response, management of contractor compliance with LMP • Rational use of water resources water resources, and proper handling of construction waste and pollution prevention • SEA/SH Awareness, Prevention and Response • Resettlement planning and implementation • Management of project-related coastal environment impacts, including on coral reefs and waters near ports • Chance Find procedures • Stakeholder engagement and management of GRM. 	<p>Initial E&S training for the PIU staff was already provided in 2022 and 2023 on the World Bank's environmental and social framework, including a workshop on resettlement in late 2023.</p> <p>Additional training to be provided in 2024 and throughout life of project for the PIU and other responsible entities</p>	<p>PIU PICMC Island entities of PICMC Involved government technical services including DGEF and its island entities ANAM Contractor and Supervision (ESS2, ESS4 and ESS8)</p>
RC 2	<p>TRAINING ON HEALTH AND SAFETY AT WORK</p> <p>Training of Project workers in Occupational health and safety, including emergency prevention, preparedness and response. Health and safety rules Solid and liquid waste management Public safety and security SEA/SH Awareness, Prevention and Response</p>	<p>Before the start of the civil works</p>	<p>PIU PICMC Island entities of PICMC Suppliers/Contractors Navigation operators ANAM</p>
RC 3	<p>EMPLOYMENT AND WORKING CONDITIONS</p> <p>Conditions of employment under national labor legislation Codes of conduct for suppliers, service providers and subcontractors Workers' organizations and trade unions Rules on child labor and the minimum age of admission to employment for children.</p>	<p>Before the start of sub-projects works</p>	<p>Contractors Navigation operators ANAM</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
RC 4	<p>SEA/SH</p> <p>Training provided by SEA/SH Specialist consultant(s)</p> <p>Procedures for recording and handling complaints, archiving Complaint Resolution Procedures Documentation and complaint handling Use of procedure by the different partners Raising public awareness SEA/SH awareness, prevention and mitigation measures</p>	<p>SEA/SH training started during the implementation of SOP2 and will continue throughout the life of the project.</p>	<p>PIU PICMC Island entities of PICMC</p>