REPUBLIC OF CABO VERDE

Enhancing the Sustainability, Resilience and Diversification of the Tourism Sector in Cabo Verde Project (P176981)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

January 30, 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

- 1. The Republic of Cabo Verde (hereinafter referred to as the Recipient) shall implement the Enhancing the Sustainability, Resilience and Diversification of the Tourism Sector in Cabo Verde Project (the Project) through the Ministry of Finance and Business Promotion (MFFE) with the collaboration of the following Ministries and Agencies: Ministry of Tourism and Transport (MTT), Tourism Institute (ITCV), Ministry of Infrastructure, Territorial Planning and Housing (MIOTH); Ministry of the Sea; Estradas Cabo Verde (ECV); Pró-Empresa; Pro-Garante, Pró-Capital; Cabo Verde, Institute for Gender Equity (ICIEG). Implementation of the project is the responsibility of the Unidade de Gestão de Projetos Especiais (UGPE, serving as Project Implementing Unit). The International Development Association (IDA) (hereinafter referred to as the Association) has agreed to provide the original financing (P176981) and additional financing (P179274) for the Project, as set out in the referred agreements. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for Project referred to above.
- 2. The Recipient shall implement material, measures and actions to ensure that the project is implemented in accordance with the Association's Environmental and Social Standards (ESSs). To this end, this Environmental and Social Commitment Plan (ESCP) sets out material measures and actions to be carried out or caused to be carried out by the Borrower, including the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, grievance management and the environmental and social assessments and instruments to be prepared or updated, disclosed, consulted, adopted and implemented under the ESCP and the ESSs, all in a manner acceptable to the Association.
- 3. The Recipient will also comply with the provisions of any other Environmental and Social (E&S) documents required under the Environmental and Social Framework (ESF) and referred to in this ESCP, such as the Environmental and Social Management Framework (ESMF), Environmental and Social Impact Assessments (ESIA), Environmental and Social Management Plans (ESMPs), Resettlement Policy Framework (RPF), Labor Management Procedures (LMP), and Stakeholder Engagement Plan (SEP) including the Grievance Redress mechanism (GRM), Environmental and Social Management System (ESMS), and the timelines specified in those E&S documents.
- 4. The Recipient is responsible for compliance with all the requirements of the ESCP, even where the implementation of specific measures and actions is carried out by the Ministry or Agency referred to in point 1 above.
- 5. The implementation of the relevant material, measures and actions set out in this ESCP shall be monitored and communicated to the Association by UGPE, in accordance with the specific requirements of the ESCP and the conditions of set out in the legal agreement between the parts. The Association shall monitor and evaluate the progress and completion of physical measures and actions throughout the implementation of the project.
- 6. As agreed between the Association and the Recipient, this ESCP may be revised periodically during the implementation of the project in a manner that reflects the adaptive management of

changes and unforeseen circumstances that may arise in connection with the project or in response to the assessment of project performance, carried out under the ESCP itself. In these circumstances, the Recipient the through UGPE shall propose and agree upon amendments with the Association and update the ESCP accordingly. Agreements on amendments to the ESCP shall be documented by the exchange of letters signed between the Association and the Recipient, through the UGPE. The UGPE shall promptly disclose the updated ESCP.

- 7. When changes, unforeseen circumstances, or Project performance result in changes in risks and impacts during Project implementation, the Recipient shall provide additional funds, if necessary, for actions and implementation measures to address such risks and impacts, which may include environmental, health, and safety impacts, labor influx, risk of degradation of natural resources and pollution of the physical environment (soil, air, surface and ground water, noise on the construction sites), the risk of disrupting the free movement of people and goods, the risk of social conflicts, and the risks to the health and safety of the population (including outbreak of diseases among the population and workers, accidents linked to construction site activities, health risks linked to poor management of waste from the construction sites, loss of land and property, and gender-based violence, sexual exploitation and abuse, sexual harassment, unwanted pregnancies among the Recipient populations, etc.), and risks related to child labor.
- 8. The table below presents the important measures and actions required, the responsibilities of the actors involved in the Project, and the timeframes for implementing the selected measures and actions.

	ary of concrete measures and actions to be implemented to be potential environmental and social risks and effects of the	Indicative timeline	Responsible Entity/Authority
MONIT	ORING AND REPORTING		
	REGULAR REPORTING Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project and Subprojects, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and the functioning of the grievance mechanism(s). Monitoring and reporting frequency of each of the instruments will be provided in the respective E&S instruments. In addition, the monitoring reports will include (i) design modification or change in scope of subprojects brought to Association notice, (ii) assessment of changes and updating/addendum to ESIA/ESMP, (iii) site observations on Contractor's performance on Environmental Social Health and Safety (ESHS) and other plans in ESMP, (iv) summary of stakeholder engagement activities as stated in the SEP, and (v) corrective Actions and planned E&S activities for next quarter.	Monthly Progress reports shall be submitted to the Association on an agreed format not later than fifteen (15) days after the end of each month. The reporting format will be agreed by First Implementation Support Mission.	UGPE through Project Manager, and Environmental and social specialist (ESS)
MR2	REPORTING OF INCIDENTS AND ACCIDENTS: The Recipient shall immediately notify the Association of any incident or accident related to or having a direct impact on the Project, or likely to have a significant negative effect on the environment, affected communities, the general public or workers, including, inter alia, any COVID-19 outbreak in the Project and subproject areas. Indicative examples: any accident or incident related to the implementation of the Project or any allegation of gender-based violence. The Borrower shall provide sufficient details of the incident or accident, indicating the immediate steps taken or that are planned	Report incident or accident to the Association within twenty-four (24) hours and no later than forty eight (48) hours after learning of the incident or accident and provide investigation report within one week (to conform to Safeguards Incident Reporting Toolkit (SIRT) in case of accidents).	

 MR3 CONTRACTORS MONTHLY REPORTS: The Project Implementing Unit shall cause the contractors to prepare and submit monthly Progress report (MPR) explaining the compliance status of the Project with the ESMP in their scope. Details will include status on: Contractor's ESMP implementation work plan and review summary of implementation progress by UGPE; Implementation of Contractor's ESMP and related plans Status of Compliance with E&S statutory requirements (including consents, licenses, insurance, etc.); Status on actions indicated in the Labor Management Procedures; ESHS incidents & supervision; Usage of Personal Protective Equipment (PPE) such as hard hats, safety shoes and safety vests by workers; Safety at work sites like providing traffic signage, barriers/delineator, management of traffic, drainage and 	clause in the contract and thereafter ensure compliance therewith nonitoring
 pliable road surface etc; Training conducted, and worker's participation (submit reports with statistics of training and worker's participation); Functioning of GRM relating to labor aspects, including summary details of Workers grievances; Community grievances; Corrective Actions and planned E&S activities for next month. 	

ESS 1 : ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

1.1	ORGANIZATIONAL STRUCTURE: The Recipient shall maintain the Project Management Unity (UGPE) which includes, among others, an environmental and social specialist. Adequate resources shall be allocated to ensure that the planned tasks are carried out effectively, including implementation of this ESCP with qualified staff and resources to support management of ESHS risks and impacts of the Project, monitoring of the implementation of the Environmental & Social Management Framework (ESMF) and Environmental & Social Management System (ESMS) that subprojects must comply with. UGPE as well as PFIs or support agencies will review the existing ESMS and ensure its implementation. In order to achieve this, UGPE and Participating Financial Institutions (PFIs) as well as the Partial Credit Guarantee (PCG) Fund Manager need to assign a senior management representative to have overall accountability for environmental and social performance plus a staff member as an E&S focal person to coordinate E&S requirements and implementation of the project ESCP and ESMS.	The PIU is already established and shall be maintained during the implementation of the project, including the full time environmental and social specialist. UGPE and Participating Financial Institutions (PFIs) as well as the Partial Credit Guarantee (PCG) Fund Manager have prepared an ESMS that is approved by the Association and that is in the process of implementation. The ESMS will be reviewed pursuant to the provisions of the Financing Agreement. An E&S senior representative and an ESF Focal Point will be designated/appointed by each PFI and PCG fund manager when each PFI/PCG will be established to support the Project before the beginning of the relevant Project activities and throughout Project Implementation.	UGPE PRO-GARANTE - Partial Credit Guarantee (PCG) PRO-CAPITAL - jumpstart risk capital in Cabo Verde PRO-EMPRESA - the lead MSME support agency
1.2	ENVIRONMENTAL AND SOCIAL ASSESSMENT: a. The Borrower shall prepare, disclose, consult and adopt for the Project an Environmental and Social Management Framework (ESMF). The Project ESMF shall include a Labor Management Procedures (LMP), gender-based violence (GBV), sexual exploitation and abuse (SEA) and sexual harassment (SH) risks assessment and proposal of relevant gender mainstreaming actions into tourism sector under the GBV/SEA/SE Action Plan, and Chance-find procedures. For identified project area, the Recipient shall prepare, disclose, adopt, and implement any environmental and social assessments including Environmental	The project ESMF is prepared. It will be disclosed prior to Appraisal and be adopted and implemented throughout Project implementation. Any subsequent ESIA/ESMP shall be prepared and implemented prior to the launch of corresponding civil works.	UGPE Tourism Institute (ITCV) Municipalities of Ribeira Grande of Santiago, Sal, São Vicente, Porto Novo, Ribeira Grande of Santo Antão and Paul (Municipalities) Infrastructures of Cabo Verde (ICV) Ministry of Infrastructure, Territorial Planning and Housing (MIOTH) Estradas Cabo Verde (ECV)

	and Social Impact Assessment (ESIA) and/or Environmental and Social Management Plans (ESMP), Health and safety plans (HSP), WHO guidelines on COVID-19, and other relevant Good International Industry Practice (GIIP), all in accordance with the ESSs.		Contractors
	 b. The Borrower shall prepare, disclose, consult and adopt the ESMP for the project sub-activity of rehabilitation of 15 km of the Espargos-Santa Maria road. c. Assess the environmental and social risks and impacts of proposed activities for MSMEs, in accordance with Environmental and Social Management System (ESMS), revised pursuant to the provisions of the Financing Agreement. The ESMS will identify, assess, manage, and monitor the E&S risks and impacts of MSME sub-loans on an ongoing basis, commensurate with the nature and scale of their risks and impacts and support Participating Financial Intermediaries (PFIs) and Partial Credit Guarantee (PCG) in meeting the ESMS requirements. 	The ESMP for the rehabilitation Espargos-Santa Maria road is prepared and will be thereafter adopted and implemented throughout the carrying out of this project activity. The ESMS will be revised, consulted, and disclosed within 90 days of project effectiveness and before approval and launching the procurement process for the relevant Project activities, and thereafter throughout the carrying out of such activities.	
1.3	 EXCLUSIONS FOR SUB-PROJECT ACTIVITIES RELATED TO MSMES: Exclude the following type of activities as ineligible for financing under the Project: Any activities under the Exclusion List or where there is a non-compliance with the ESF Standards and the relevant E&S legal requirements of Cape Verde. Any financing that does not fit the eligibility criteria for MSMEs under the Project. Any activities that are "substantial" and "high" risk. Any other exclusion criteria to be specified in the ESMS. The exclusion list and applicable Cape Verde's E&S laws as well as guidance under ESSs are the "Applicable Performance Requirements". 	The exclusion list will be agreed with the Bank and finalized as part of the ESMS prior to disclosure 90 days after effectiveness	UGPE/(with input from PFIs & PCGs)
1.4	MANAGEMENT TOOLS AND INSTRUMENTS:		

	Once the sub-project sites have been identified, the Recipient, through UGPE shall screen any proposed sub-project activities using the Environmental and Social Checklist, and, in accordance with the ESMF prepared for the Project, draft, adopt, and implement the site-specific Environmental and Social Impact Assessment (ESIA) and/or Environmental and Social Management Plan (ESMP), or other site-specific instrument as required, all in accordance with the ESSs.	All the sub-projects must be verified through the Environmental and Social Checklist prior to the carrying out of the relevant activities in the subproject site. Since the project site have been identified the screening process starts and this process will be maintained	UGPE ITCV SPFs ICV ECV MIOTH
	An Environmental and Social Commitment Plan (ESCP) is prepared and shall be implemented.	during project implementation.	
	Other safeguard tools and instruments shall be prepared once the technical studies are completed and the Sub-projects are identified and after the Preliminary Review of all Sub-projects following the Environmental and Social Management Framework (ESMF) prepared for the Project, such as Environmental and Social Impact Assessments (ESIA), Resettlement Action Plans (RAPs), and Social and security assessment.		
	(ESMPs) of the Sub-projects established and adopted shall be implemented in a manner acceptable to the Association.		
1.5	E&S BUDGET Adopt, and implement the Environmental and Social Management Budget included in ESMF, for the implementation and compliance of E&S requirements for the Project.	Budget allocations evidenced by Project effectiveness	UGPE
1.6	CONTRACT MANAGEMENT: The Recipient, through UGPE shall incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, and the Labor Management Procedures, into the ESHS specifications in the terms of reference and tender documents for works contracts and supervision (including codes of conduct, coordination, monitoring reports, and grievance management mechanisms); and include provisions for non-compliance.	Before contracting, during preparation of the bidding documents and during project implementation.	UGPE through Procurement specialist

	 Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts. The UGPE shall require the development and implementation of the following procedures by project contractors and subcontractors for the project implementation phase: Compliance with ESMF requirements; Environmental and Social Impact Assessment (ESIA); Environmental and social management Plan (ESMP) design and implementation; Code of conduct on child labor and sexual exploitation, abuse and sexual harassment (SEA/SH); Compliance with the requirements of the specifications with regard to price, duration, and quality; Emergency preparedness and response plan; Work plan and timeline; Work procedures / standard methodologies; 		
1.7	LICENSES, CONSENTS AND PERMITS: The MTT, ICV, and ECV shall obtain or assist in obtaining from the competent national authorities the necessary licenses, consents, and authorizations for the implementation of the project, in accordance with the national legislation in force, including: > Public Consultation; > Building Permits; > Implementation projects; > Temporary and permanent links to public networks; > Accessibility. Comply with or enforce, within the time periods specified in the licenses, consents, and authorizations, the terms and conditions of licenses, consents and permits during the implementation of the project.	Obtain licenses and permits prior to carrying out any Project activity requiring a license.	UGPE trough Project Manager ITCV and Satellite Project Focal (SPFs) within the municipalities of Ribeira Grande of Santiago, Sal, São Vicente, Porto Novo, Ribeira Grande of Santo Antão and Paúl Municipalities of Ribeira Grande of Santiago, Sal, São Vicente, Porto Novo, Ribeira Grande of Santo Antão and Paúl (Municipalities) ICV MIOTH ECV
1.8	TECHNICAL ASSISTANCE	Throughout the Project implementation	

	Ensure that the consultancies, studies, 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 incorporate the relevant requirements of the		
	ESSs.		
	Ensure that any outputs from the technical assistance activities are consistent with the ESSs.		
1.9	a) Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements for the implementation of CERC Part, in accordance with the ESSs.	Prior to the start of design/civil works under CERC and maintained throughout Project implementation	UGPE
	b) Prepare, consult, adopt, and disclose any environmental and social (E&S) instruments which may be required for activities under CERC Part of the Project, in accordance with the CERC-ESMF Addendum and the ESSs, and thereafter implement the measures		
	and actions required under said E&S instruments, within the		
FCC 2 · F	timeframes specified in said E&S instruments. PERSONNEL AND WORKING CONDITIONS		
2.1	PERSONNEL MANAGEMENT PROCEDURES:		
2.1	The Recipient, through UGPE shall develop Labor Management Procedures (LMP), as part of Project ESMF, that comply with applicable national legislation and ESS 2, for the Project and sub- project, including through, inter alia, occupational, health and safety measures (including personal protective equipment, and emergency preparedness and response measures), setting out grievance mechanisms for Project workers, the recruitment and project management process and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms if any.	LMP is prepared as part of Project ESMF. It will be disclosed prior to Appraisal and shall be adopted and implemented throughout Project implementation.	UGPE ITCV SPFs ICV ECV MIOTH
	Implement the Code of Conduct which is included in the ESMF and LMP.	Code of Conduct signed before commencement of any activities and	

		implemented throughout project	
		implementation.	
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS: The Recipient, through UGPE shall develop and maintain a grievance mechanism for any labor and employment related issues as described in the LMP in accordance with ESS 2 and applicable national labor laws, that is easily accessible and disseminated to Project workers.	A workers' GRM shall be established prior to the carrying out of the relevant activities and shall be maintained during project implementation.	UGPE Contractors
2.3	OCCUPATIONAL HEALTH AND SAFETY MEASURES: The Recipient, through UGPE shall ensure that project contractors develop and implement an Occupational Health and Safety Plan (OHSP) to maintain safe working environment and workplace, as required by the ESMP.	OHPS finalized and implemented prior to the start of construction and maintained throughout the implementation of the project.	UGPE Contractors
	The OHS Plan will include emergency preparedness and response plan; training of project workers and remedies for occupational injuries, accidents, fatalities, COVID-19 prevention measures, and disability and will follow the General Environment Health and Safety Guidelines (EHSG).		
	Monitor and report the performance of the contractors to ensure the implementation of occupational, health and safety measures and practices according to best industry standards and General Environment Health and Safety Guidelines (EHSG) as defined under the ESMF and LMP.	Submit as part of Monthly Progress reports to the Association whenever requested.	
2.4	EMERGENCY PREPAREDNESS AND RESPONSE: The Recipient, through UGPE shall ensure that the project contractors develop and implement an emergency preparedness and response plan and shall coordinate with the measures referred to in point 4.2. The Recipient shall immediately notify any major emergency (e.g., accidental spills, accidents with serious damage or with workers).	Before starting project activities. During the implementation of the project.	UGPE Contractors
2.5	TRAINING OF PROJECT WORKERS: The Recipient, through UGPE shall arrange with the Association and project contractors to organize training for workers to ensure better risk management for local communities. The training shall include		UGPE ITCV

ESS 3 : F	health and safety, code of conduct, grievance reporting and management, including GBV related grievances, etc.	Before the start of the activities and during the implementation of the project.	SPFs Municipalities ICV ECV MIOTH Contractors
3.1	 WASTE AND HAZARDOUS MATERIALS MANAGEMENT: The Recipient, through UGPE shall ensure that the project contractors develop and implement the waste and hazardous materials management plan E-Waste Management Plan, commonly as part of the ESIA or ESMP, where relevant, to manage risks such as from common waste, construction waste, e-waste etc., in a manner acceptable to the Association. These measures will be incorporated, where applicable, into the design of each Project activity as applicable, and implemented through the ESMPs under preparation. While improving housing conditions, access to basic services, and urban upgrading for poor and vulnerable households the Recipient shall ensure adoption of climate co-benefits, energy and water efficiency measures consistent with ESS3, as guided in the ESMF, and as per the national law, guidelines and policies and ensure proper disposal of construction waste. For all subproject activities, assess impacts (through ESIA) from waste generation (including hazardous waste), pollution emissions and discharges, including GHG emissions where likely to be significant, and prepare and implement proportionate mitigation measures through ESMPs. COMMUNITY HEALTH AND SAFETY 	Prior to the start of the work and maintained during the implementation of the project. Climate co-benefits, energy and water efficiency measures will be carried out throughout the Project implementation. The E-Waste Agreement is prepared and approved by the Association. It will be adopted to the project to the start of the works and maintained during the implementation of the project where applicable.	UGPE SPFs Contractors
4.1.	ROAD SAFETY AND TRAFFIC:		
			UGPE Contractors

4.2	The Recipient, through UGPE shall ensure that the project contractors develop and implement road safety plans, in particular a traffic plan for construction equipment. UGPE shall ensure that the project contractors implement properly prepared and marked access routes to the shipyards. COMMUNITY HEALTH AND SAFETY: The Recipient, through UGPE shall ensure that project contractors develop and implement measures and actions to assess and manage specific risks and impacts to the community arising from	Prior to the start of the work and maintained during the implementation of the project In the execution phase of the work and maintained during the implementation of the project.	UGPE Contractors
	project activities, including those related to the presence of project workers and any risks related to labor recruitment as required in the ESMF in actions 1.2 and 1.4 above.		
4.3	GBV AND SEA/SH RISKS: A gender-based violence (GBV), sexual exploitation and abuse (SEA) and sexual harassment (SH) risks assessment and proposal of relevant gender mainstreaming actions into tourism sector shall be prepared as part of ESMF. The GBV/SEA/SH Action Plan including measures to manage those risks shall be prepared, adopted and implemented. It shall contain a set of measures to increase accountability, prevent GBV/SEA/SH, and mitigate the risk of GBV/SEA/SH, including but not limited to developing codes of conduct for workers and promoting GBV/SEA/SH risk awareness training for project stakeholders.	GBV/SEA/SH risk assessment is concluded as part of the ESMF. It will be disclosed, adopted and implemented throughout Project implementation. The GBV/SEA/SH action plan, including a set of risk mitigation measures and Codes of conducts to be signed by the applicable project personnel was updated to comply with project ESMF and will be adopted to the project to the start of the work and maintained during the implementation of the project. Codes of conduct signed by workers and training provided prior to the start of project activities.	UGPE ICIEG Contractors
ESS 5: L	AND ACQUISITION, LAND USE RESTRICTIONS AND INVOLUNTARY RE	SETTLEMENT	
5.1	LAND ACQUISITION, LAND USE RESTRICTIONS AND INVOLUNTARY RESETTLEMENT:	The Project RPF will be disclosed prior to Appraisal and be adopted and	UGPE ITCV

	The Recipient, through UGPE shall prepare, disclose, consult and adopt for the Project a Resettlement Policy Framework (RPF) for the identified project sites as required and in accordance with the ESS 5 and relevant national legislation. Prepare, disclose, adopt, and implement resettlement action plans (RAPs) in accordance with information and template included in the ESMF and RPF if required and in a manner	implemented throughout Project implementation. Any subsequent Resettlement Action Plans shall be prepared and implemented prior to the launch of corresponding civil works.	SPFs ICV ECV MIOTH
ESS 6: 0	acceptable to the Association.	OF LIVING NATURAL RESOURCES	
6.1	SUSTAINABLE MANAGEMENT OF BIOLOGICAL NATURAL RESOURCES: The Recipient, through UGPE shall ensure sustainable management of biological natural resources through good management practices and the use of available technological tools	In the execution phase of the work and maintained during the implementation of the project.	C C
6.2	 PROTECTED AREAS/BIODIVERSITY CONSERVATION: a. Apply ESMF and measures to screen subproject site within designated protected areas, if applicable. b. Biodiversity risk and impact assessments will be conducted as part of each of the project's Environmental and Social Assessments and measures to manage these risks will be included in the ESIAs/ESMPs. These ESIAs/ESMPs will include mitigation measures considering the principle of the mitigation hierarchy, as defined in paragraph 27 of the ESS 1 of the ESF. c. Assess the subproject risks and impacts on biodiversity and implement bio-diversity management plan as part of subproject ESMP 	The project ESMF is prepared. It will be disclosed prior to Appraisal and be adopted and implemented throughout Project implementation These management procedures are systematically included in the ESIAs/ESMPs and in the Contractors contracts. Prior to invitation to bid for subprojects	-
	RADITIONAL INDIGENOUS POPULATION / HISTORICALLY DISADVANT		
7.1	Not relevant	Not relevant	Not relevant
	CULTURAL HERITAGE		
8.1.	CHANCE FINDS:		UGPE

	In accordance with ESMF and ESS8, the Recipient shall update, disclose, consult and adopt the Cultural Heritage Management Plan (CHMP) for Cidade Velha which has historical importance and overall recognition as a UNESCO World Heritage Site. The ESMF, through the subproject screening process, shall ensure that any sites with or near cultural heritage are identified and any necessary measures taken, according to the CHMP. The Recipient, through UGPE shall implement a procedure for archaeological discoveries or chance find procedures as described in the ESMF. Chance find procedures clauses shall be included in all work contracts in case any cultural heritage is unexpectedly found.	Before the start of any construction works in Cidade Velha and maintained throughout the implementation. The Ministry of Culture and Creative Industry as already prepared the "Plano de Gestão 2019 -2022 for Cidade Velha, Património Mundial"	Ministry of Culture and Creative Industry (MCIC) through the Institute of Cultural Heritage (IPC) and the Gabinete de Gestão do Património Mundial - Cidade Velha (GGPM Cidade Velha) Municipality of Ribeira Grande de Santiago
9.1	ESMS: The Recipient shall guaranty the existence and implementation of the ESMS by the Participating Financial Institutions (PFIs) and Partial Credit Guarantee (PCG) involved in the project institutional and implementation arrangements. In order to achieve this, the UGPE shall guarantee that those PFIs as well as the Partial Credit Guarantee (PCG) Fund Manager have assigned both an Environmental & Social Management System (ESMS) in a manner acceptable to the Association.	The entities that comprise the national financial ecosystem, namely PRO- GARANTE and PRO-CAPITAL, have designed the ESMS that is in early implementation. The ESMS will be reviewed within 90 days of project effectiveness, if any adjustments are needed to comply with the project ESMF. Some PFIs will express interest in being involved in the project's institutional and management arrangements. In such cases the PFI shall demonstrate that it already has an Environmental and Social Management System (ESMS) in place, it will provide adequate documented evidence of such an ESMS, indicating which elements (if any) will be improved or modified to meet the Association's standards, and if	UGPE PRO-GARANTE - Partial Credit Guarantee (PCG) PRO-CAPITAL - jumpstart risk capital in Cabo Verde PRO-EMPRESA - the lead MSME support agency PFIs

		institutional and management arrangements for the project.			
9.2	FI ORGANIZATIONAL CAPACITY: Financial Intermediaries shall prove that they assign a Senior management representative to have overall accountability for environmental and social performance plus a staff member as an E&S focal person to coordinate E&S requirements and implementation of the ESMS.	The Financial Intermediaries have already assigned a Senior management representative to have overall responsibility for environmental and social performance and a staff member as an E&S focal person to coordinate E&S requirements. The PFIs shall also assign an E&S focal points to support implementation and compliance with the ESMS.	UGPE PRO-GARANTE - Partial Credit Guarantee (PCG) PRO-CAPITAL - jumpstart risk capital in Cabo Verde PRO-EMPRESA - the lead MSME support agency PFIs		
ESS 10:	STAKEHOLDER PARTICIPATION AND INFORMATION DISSEMINATION				
10.1	PREPARATION AND IMPLEMENTATION OF THE STAKEHOLDER ENGAGEMENT PLAN: The project has prepared a first draft of the Stakeholder Engagement Plan (SEP), which were submitted to stakeholders for consultation, review and prior approval before project appraisal in accordance with ESS 10 and relevant national legislation. Thereafter, when approved, the SEP shall be disclosed as required.	The first draft of Project SEP is prepared. It will be disclosed prior to Appraisal and be adopted and implemented throughout Project implementation.	UGPE ITCV SPFs ICV ECV MIOTH		
10.2.	PROJECT GRIEVANCE MECHANISM (GRM): A Grievance Redress Mechanism (GRM) is developed to address complaints related to the implementation of the project, as described in SEP.	Adopted and maintained during project implementation.	UGPE through Project Manager and ESS ITCV SPFs ICV ECV MIOTH		
CAPACITY BUILDING					
	Activities	Beneficiary	Program		

WB Environmental and Social Standards Training Module - Environmental and Social, design and implementation	Project Technical Committee Project Staff based in UGPE (ESS, M&E- S, Procurement, financial), ITCV, SPFs, ICV, ECV and MIOTH, IPC; National Environment Directorate staff. Municipalities and the Satellite Project	1st quarter of the 1st year of implementation 1st quarter of the 1st year of
 of a training module on the following aspects: Screening instrument for sub-projects selection process (environmental and social checklist); National environmental policies, procedures and legislation; Knowledge of the process for monitoring the implementation of the ESMP and RPF. 	Focal (SPFs) Non-governmental organizations (NGOs) Community based Associations.	implementation
 Training Module - Occupational Health and Safety: Individual and collective protective equipment; Risk management in the workplace; Prevention of work-related accidents; Health and safety rules; Solid and liquid waste management; Emergency preparedness and response. 	Project Staff based in UGPE, ITCV, SPFs, ICV, ECV and MIOTH, IPC and Municipalities Contractors' employees.	Beginning of the work
 Working conditions: Work conditions in accordance with the national laws and regulations in force; Code of conduct for employers and contracted staff. GRM for workers – grievance submission and redress procedures. 	Project Staff based in UGPE, ITCV, SPFs, ICV, ECV and MIOTH, IPC and Municipalities. Contractors' employees.	Beginning of the work
 Training Module – Grievance Mechanism: design and production of a training module covering the following aspects: Classification of complaints; Registration and grievance redress procedures; Recording, documentation and handling of grievances; Allocation of rules and responsibilities of the GRM organizational structures; Level of processing, types of authorities and affiliation. 	Project Staff based in ITCV, SPFs, ICV, ECV and MIOTH, IPC Municipalities Non-governmental organizations (NGOs) Community based Associations Community leadership.	1 st quarter of the 1st year of implementation
GBV/SEA/SH risk module:	Project Staff based in UGPE, ITCV, SPFs, ICV, ECV and MIOTH, IPC;	Before the start of the project activities. Starts in 1 st quarter of the

 Awareness raising and measures to prevent and mitigate GBV/SEA/SH risks and gender mainstreaming actions into tourism sector: ▶ Prevention and response to GBV/SEA/SH based on Cabo Verdean laws and regulations 	Municipality technicians Civil society, non-governmental organizations (NGOs) Community based Associations, including	1st year of implementation, and continues throughout project implementation with annual refresher courses.
 Survivors Services provider; GBV/SEA/SH complaint management Themes, activities and target groups shall be developed in the GBV action plan. 	Women's associations Community leadership Contractors' employees.	