



REPUBLIC OF KENYA
THE NATIONAL TREASURY AND PLANNING

**SUPPORTING ACCESS TO FINANCE AND ENTERPRISE
RECOVERY (SAFER) PROJECT**

Environmental and Social Commitment Plan

November, 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN FOR SUPPORTING ACCESS TO FINANCE AND ENTERPRISE RECOVERY (SAFER) PROJECT

1. The Republic of Kenya (the Recipient) will implement the Supporting Access to Finance and Enterprise Recovery Project (SAFER) (P175017) (hereinafter, the **Project**), with the involvement of the National Treasury (NT) and Financial Intermediaries (FIs). The International Development Association (hereinafter the the Association) has agreed to provide financing for the Project.
2. The NT and relevant FI shall implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (ESCP) sets out material measures and actions, any specific documents or plans, as well as the timing for each of these.
3. The Recipient shall also comply with the provisions of any other Environmental and Social (E&S) Documents required under the ESF and referred to in this ESCP, including but not limited to the Environmental and Social Management System (ESMS), Stakeholder Engagement Plan (SEP), Labour Management Procedures (LMP), and the timelines specified in those E&S documents.
4. The Recipient is responsible for compliance with all requirements of the ESCP even when implementation of the specific measures and actions is conducted by NT, the Apex Project Implementating Entity (PIE), Participating Financial Institutions (PFIs), or other entities.
5. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Association by the Recipient as required by the ESCP and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and the Recipient, 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 Recipient will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association and the Recipient. The Recipient shall promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include risks and impacts on environment, community and occupational health and safety, gender based violence and labour conditions.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
Monitoring and Reporting			
A	<p>REGULAR REPORTING:</p> <p>i. Prepare and submit to the Association regular monitoring progress 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 E&S documents required under the ESCP including specifically the various Environmental and Social Management Systems (ESMS), capacity building and training of the Apex PIE and PFIs on the Environment and Social Management System (ESMS) and management of environmental and social risks and impacts, stakeholder engagement activities, the functioning of the grievance mechanism and information disclosure.</p> <p>ii. Require and ensure that the regulated financial intermediaries (Apex PIEs and PFIs), the Credit Guarantee Scheme Unit and the Credit Guarantee Company (CGC) when incorporated, prepare and submit to NT regular environmental and social performance reports and information.</p> <p>iii. Prepare and submit training and capacity building reports. These reports shall be based on the developed environmental and social operational and training manuals for the Apex PIE, PFIs and MSMEs that will guide in the operationalization process for the ESMS and management of environmental and social risks and impacts.</p>	<p>i. Every six months throughout the Project implementation</p> <p>ii. Semi-annually (every 6 months) throughout the Project implementation</p> <p>iii. Annually</p>	<p>i. The National Treasury (NT)</p> <p>ii. Apex PIE, PFIs and CGC</p> <p>iii. The National Treasury (NT)</p>
B	<p>INCIDENTS AND ACCIDENTS:</p> <p>i. Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers</p>	<p>i. Reporting of incidents and accidents to the Association within 24 hours of</p>	<p>The National Treasury Apex PIE</p>

	<p><i>including</i> child abuse, gender-based violence. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, corrective actions taken, compensation paid and any information provided by any contractor and supervising entity, as appropriate, findings of the Root Cause Analysis (RCA). Subsequently, as per the Association’s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence. The Recipient shall also impose corresponding reporting obligations on the Apex PIE and PFIs, including through provisions in their loan agreements.</p> <p>ii. Develop environmental and social operational and training manuals for the Apex PIE, PFIs and Micro, Small and Medium Enterprises (MSMEs) to guide in the operationalization process for the ESMS that would include reporting requirements for incidents or accidents.</p>	<p>becoming aware of such incidents or accidents.</p> <p>ii. Root-cause analysis at Association’s request for such an analysis, along with measures to prevent recurrence to be provided within fifteen days.</p> <p>iii. The NT shall obligate the Apex PIE and Credit Guarantee Company (CGC) to report to the NT details of any significant incidents or accident within 24 hours of becoming aware of the incident or accident. The Apex PIE and CGC’s ESMSs shall provide guidance to PFIs to require MSMEs to report details of any significant incidents or accident.</p> <p>iv. NT shall submit the training reports to the Association that cover training of the accidents and incidents notification process every quarter.</p>	<p>CGC and PFIs</p>
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ESS1 Assessment and Management of Environmental and Social Risks and Impacts

<p>1.1</p>	<p>ORGANIZATIONAL STRUCTURE:</p> <ul style="list-style-type: none"> i. For Component 1, the National Treasury shall maintain an organizational structure with qualified staff and resources to support the management of environmental and social risks; including expediting the hiring and deployment of a qualified and experienced full time Environmental and Social officer. ii. For Component 2, upon the establishment and operationalization of the Credit Gurantee Company, the CGC shall be required to maintain an organization structure and qualified staff and resources to support the management of environmental and social risks; including the hiring and deployment of a qualified and experienced full time Environmental and Social officer. iii. Throughout the Project implementation period, the NT shall obligate the Apex PIE, and the Apex PIE shall cause the PFIs to assign and retain from among its existing staff and/or hire (where expertise does not exist internally) E&S personnel responsible for coordination of the environmental and social management function, including the management of SE/GRM, gender issues related to sub-projects. This obligation shall be included as condition of the loan agreements to the Apex PIE and PFIs. iv. NT shall develop environmental and social MSMEs training toolkit and training manuals to guide the capacity building process for the Apex PIEs and Retail, PFIs and MSMEs. 	<ul style="list-style-type: none"> i. The NT Environment and Social officer shall be hired /deployed within 30 days after the Effective Date of the Project. ii. The CGC Environmental and Social officer shall be hired prior to the commencement of activities for the CGC. iii. Apex PIE and the Apex PIEs shall cause the PFIs to assign E&S coordinator, gender focal point and SE/GRM focal point after signing of loan and subsidiary loan agreements. iv. Prior to commencement of activities under Component 1 of the Project. 	<p>The National Treasury Apex PIE and PFIs</p>
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1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT/ MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS</p> <p>i. The National Treasury (NT) shall develop the umbrella ESMS for the Project. NT shall be required to develop, implement and maintain the ESMS consistent with the requirement set out in ESS 9 and proportionate to the on-lending FI risks.</p> <p>ii. NT shall ensure that the requirements of the Project ESMS are integrated into the Apex PIE PFIs and MSMEs through the loan and sub-loan agreements and the Project implementation meets the ESSs, including ESS2 and ESS 9 requirements.</p> <p>iii. The Credit Gurantee Company (CGC) shall develop an ESMS for Component 2. CGC shall be required to develop, implement and maintain the ESMS consistent with the requirements set out in the ESS9 and proportionate to the lending FI risks.</p>	<p>i. Develop an ESMS for component 1 and 2, have it disclosed prior to the funds disbursement for Component 1 and 2.</p> <p>ii. Corporate ESMS for Apex PIE to be assessed and approved by the Association prior to approval of loans to the Apex PIE and sub-loans.</p> <p>iii. Develop an ESMS for Component 2, have it disclosed prior to commencement of the activities under Component 2.</p> <p>iv. Prepare ESMPs or SPRs for sub-projects and ensure they are approved by the PFIs prior to the financing of the MSMEs .</p> <p>v. Throughout project implementation</p>	<p>The National Treasury</p> <p>Apex PIE</p> <p>Apex PIE and PFIs</p>

	<ul style="list-style-type: none"> iv. In accordance with the existing national laws and the ESMS, and in a manner acceptable to the Association, during credit appraisal, the PFIs shall ensure that MSMEs are compliant with the existing environment and social laws and where applicable ensure that the MSMEs prepare Environmental and Social Management Plans (ESMPs) or the Summary Project Reports (SPRs) for the purpose of managing environmental and social risks related to the respective sub-projects as required by the ESMSs before approval of the sub-loans by the PFIs and prior to obtaining the relevant licence. v. Any or revised policies developed under technical assistance (TA) of the Project (component 3) shall be developed with broad stakeholder consultations consistent with the ESS 10 and subject to Strategic Environmental and Social Assessment in accordance with ESS 1 and national law requirements. vi. Carry out all TA activities in accordance with the relevant requirements of the ESF and with Terms of Reference (TOR) agreed upon with the association vii. Carry out the Social Assessment (SA) and integrate the agreed results in the ESMSs and the SEP. The SA will cover Indigenous Peoples/Vulnerable and Marginalised Groups (IP/VMGs) issues as outlined in ESS7 , as well as matters related to child labour, Gender Based Violence (GBV) and other social risks and measures and resources available to mitigate them as related to ESS1 and ESS4. 	<ul style="list-style-type: none"> vi. The TOR to be reviewed and agreed upon with the Association prior to the request for proposals. vii. Prepare a Social Assessment for Component 1 and 2 consult upon and disclosed prior to the disbursement for Component 1. viii. The SA measures are integrated in the SEP and ESMS prior to the disbursement for Component 1. 	
1.4	<p>EXCLUSIONS:</p> <ul style="list-style-type: none"> i. The ESMSs and the environmental and social operational and training manuals shall integrate and build upon the Exclusion List below in order to ensure that the MSMEs, PIES and PFIs understand with specificity and comply with the various terms mentioned in exclusion list. 	<ul style="list-style-type: none"> i. During the development of the ESMS. 	<p>The National Treasury Apex PIES</p>

	<p>ii. The following list of activities shall be ineligible for financing under the Project:</p> <ul style="list-style-type: none"> • Any activities resulting or anticipated to result in permanent or temporary physical or economic displacement. • Any activities involving adverse impacts on biodiversity conservation and sustainable management of living natural resources. • Any activities that have adverse impacts on cultural heritage as defined under ESS 8. • Production or trade in any product or activity deemed illegal under the Recipient’s laws or regulations or ratified international conventions and agreements. • Production or trade in weapons or munitions • Gambling, casinos and equivalent enterprises. • Trade in wildlife or wildlife products regulated under Convention on International Trade in Endangered Species (CITES) • Production or trade in radioactive materials (this does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where the Association considers the radioactive source to be trivial and/or adequately shielded). • Production or trade in or use of unbounded asbestos fibers. This does not apply to purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%. • Drift net fishing in the marine environment using nets in excess of 2.5 km in length. • Purchase of logging equipment for use in cutting forests. • Production or trade in wood or other forestry products other than from sustainably managed forests • Production or trade in pharmaceuticals subject to international phase outs or bans. 	<p>ii. Throughout Project implementation as part of the assessment process conducted under action 1.2 above.</p>	<p>CGC and PFIs MSMEs</p>
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	<ul style="list-style-type: none"> • Production or trade in pesticides/herbicides subject to international phase outs or bans. • Fishing in the marine environment using electric shocks and explosive materials. • Any activities that would curtail workers fundamental rights. These would include: (i) freedom of association and the effective recognition of the right to collective bargaining; (ii) prohibition of all forms of forced or compulsory labor; (iii) prohibition of child labor, including without limitation the prohibition of persons under 18 from working in hazardous conditions (which includes construction activities), persons under 18 from working at night, and that persons under 18 be found fit to work via medical examinations; (iv) elimination of discrimination in respect of employment and occupation, where discrimination is defined as any distinction, exclusion or preference based on race, color, sex, religion, political opinion, national extraction, or social origin. • Commercial logging operations in primary tropical moist forests • Production or trade in products containing Polychlorinated biphenyls (PCBs). • Production or trade in ozone depleting substances subject to international phase out. • Production, trade, storage, or transport of significant volumes of hazardous chemicals, or commercial scale usage of hazardous chemicals (includes gasoline, kerosene, and other petroleum products). • Production or storage or packaging of inflammable material. • Production or trade or use or storage of dyeing chemicals and dye intermediaries • Any activities requiring industrial production processes requiring regulatory clearances from Pollution Control Boards • Production or activities that impinge on the lands owned, or claimed under adjudication, by indigenous peoples, without full documented consent of such peoples 		
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ESS2 Labor and Working Conditions			
2.1	i. Relevant aspects of this standard shall be considered, as needed, under action 1.2 above.	i. Throughout Project implementation	The National Treasury Apex PIE CGC and PFIs
2.2	<p>LABOR MANAGEMENT PROCEDURES:</p> <p>i. The NT shall prepare, adopt, and disclose Labour Management Procedures (LMP) in line with existing national laws, regulations, and consistent with ESS 2 that will guide NT¹, Apex PIE, PFIs and MSMEs in managing labor issues.</p> <p>ii. Maintain and implement Project LMP consistent with national legislation and ESS2 (including inter alia codes of conduct addressing SEA/SH and measures to monitor and prevent child labor) and ensure that all Project workers are aware of it and it is accessible to them.</p> <p>iii. Ensure the Apex PIE and PFIs adopt and implement LMP, consistent with the Project LMP and ESS2 in a manner acceptable to the Association.</p>	<p>i. NT to develop the LMP for the Project and disclosed prior to the disbursement for Component 1. LMP to be implemented throughout Project implementation.</p> <p>ii. Implement and monitor LMP throughout Project life and report through semi-annual progress reports.</p> <p>iii. Adopted by the Apex PIE and PFIs prior to signing loan and subsidiary loan agreements respectively</p>	<p>The National Treasury Apex PIE CGC and PFIs MSMEs</p>

¹ In accordance with ESS 2, clause 8, NT/government civil servants working on the project will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement except for protecting the work force and occupational health and safety.

	<p>iv. Where applicable and in accordance with the ESMS and relevant national laws, require and ensure that the MSMEs comply with relevant LMP, including carrying out scoping, screening and prepare the appropriate environmental and social risk management tools e.g. ESMP or SPR and obtaining the necessary licenses and permits prior to disbursement of funds.</p>	<p>iv. Prior to disbursement of funds to MSMEs</p>	
2.5	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES:</p> <p>i. Adopt, and implement Project-specific occupational health and safety (OHS) measures consistent with ESS2 and such national laws as consistent with ESS2, to be specified in the project LMP as well as in the ESMS.</p> <p>ii. Ensure the Apex PIE, PFIs and MSMEs implement OHS measures as per the World Bank Group General Environmental Health and Safety Guidelines, national laws and relevant regulations.</p> <p>iii. In accordance with the ESMS, LMP and relevant national laws, NT shall require the Apex PIE and PFIs to cause the MSMEs comply with relevant OHS measures, including carrying out scoping, screening and prepare the appropriate tools e.g. ESMP or SPR incorporating OHS measures and obtaining the necessary OHS-related licences and business permits prior to disbursing funds for the sub-projects.</p>	<p>i. Adopt prior to commencement of Project activities and implement throughout Project implementation.</p> <p>ii. Throughout project implementation</p> <p>iii. Prior to disbursement of funds to MSMEs</p>	<p>The National Treasury</p> <p>Apex PIE</p> <p>CGC and PFIs</p> <p>MSMEs</p>
2.6	<p>GRIEVANCE MANAGEMENT:</p>		<p>The National Treasury</p> <p>Apex PIE</p> <p>CGC and PFIs</p>

	<p>Establish, maintain, and operate an accessible GRM for Project workers as described in the LMP, in line with national labor law and consistent with ESS2. This will involve reviewing the already existing GRMs within NT, Apex PIE and PFIs and aligning these to ESS2.</p> <p>i. Require and ensure that the PIEs and PFIs require that the beneficiary MSMEs have in place a worker’s grievance redress mechanism as described in the LMP, in line with national labour law and consistent with ESS2.</p>	<p>i. An interim GRM to be operational prior to engaging Project workers and commencement of project activities, and such interim GRM to be updated in accordance with the LMP and maintained throughout project implementation.</p> <p>ii. Report semi-annually through Project Progress Reports.</p>	MSMEs
ESS3 Resource Efficiency and Pollution Prevention and Management			
3.1	<p>i. Include resource efficiency and pollution prevention and management measures consistent with ESS3 into all PIEs and PFI ESMSs and the MSMEs sub-loan agreements.</p> <p>ii. Where applicable and in accordance with the national laws, the approved ESMS and in a manner acceptable to the Association as per the ESS3 requirements, prepare, adopt, and implement measures and action to assess and manage specific risks and impacts on resource efficiency and pollution prevention and management to the community arising from sub-projects, and include these measures in the Environmental and Social Management Plans and the Summary Project Reports (SPR) .</p>	<p>i. Throughout Project implementation.</p>	<p>The National Treasury</p> <p>Apex PIE</p> <p>CGC and PFIs</p>
ESS4 Community Health and Safety			

4.1	<p>i. In accordance with the existing national framework for addressing Gender Based Violence (GBV) and in collaboration with the ministry responsible for gender, the NT shall mainstream the management of GBV issues by preparing a GBV Action Plan that meets the requirement of the Association to establish GBV reporting channels and survivor-centric referral pathways that will cover the NT, Apex PIE, PFIs and the MSMEs. The NT shall further require the Apex PIE, PFIs and the MSMEs to mainstream and adopt the identified GBV actions /measures during implementation of the Project.</p> <p>ii. NT shall require the Apex PIE and PFIs to ensure that MSMEs as applicable prepare, adopt, and implement measures and action to assess and manage specific risks and impacts on community health and safety arising from sub-projects and include these measures in the Environmental and Social Management Plans and the Summary Project Reports (SPR) in accordance with the approved ESMS, the ESS4 requirements and the national law, in a manner acceptable to the Association.</p> <p>iii. Require PFIs to ensure that the MSMEs carry out scoping, screening and prepare the appropriate tools eg ESMP, ESIA prior to disbursement of funds.</p>	<p>i. Prepare GBV action plan for the Project and have it disclosed prior to the funds disbursements for Component 1</p> <p>ii. As part of the ESMS and throughout Project implementation.</p> <p>iii. Prior to disbursements of funds to MSMEs</p>	<p>The National Treasury Apex PIE CGC and PFIs</p>
ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement			
5.1	<p>i. In accordance with action 1.4 above, any activities resulting or anticipated to result in permanent or temporary physical or economic displacement shall be ineligible for Project financing.</p> <p>This will be based on a screening mechanism that excludes subprojects with land acquisition and resettlement impacts during credit appraisal by the Apex PIE and PFIs. The screening mechanism will also include a protocol requiring subproject application to include documentation that they own any land they will use or will be acquired by the subproject</p>	<p>i. Screening process by the Apex PIE and PFIs prior to signing loan and subsidiary loan agreements respectively</p>	<p>Apex PIE PFIs MSMEs</p>

	exclusively on a willing buyer/willing seller basis. This screening process will be outlined in the ESMS.		
ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources			
6.1	<ul style="list-style-type: none"> i. Where applicable and in accordance with the relevant national laws, the approved ESMS, and in a manner acceptable to the Association as per the ESS6 requirements, prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts on biodiversity, including identification of different habitats that may be affected from sub-project, and include these measures in the Environmental and Social Management Plans and the Summary Project Reports (SPR). 	<ul style="list-style-type: none"> i. Throughout Project implementation 	<p>The National Treasury</p> <p>Apex PIE</p> <p>CGC and PFIs</p>
ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities			
7.1	<ul style="list-style-type: none"> i. Prepare a Social Assessment (as described in Section 1.2 above) to identify barriers to entry particularly those related to discrimination, bias, literacy and numeracy for disadvantaged groups including the Indigenous Peoples/Vulnerable and Marginalized Groups (IP/VMGs) and determine if there are technically feasible measures that can be implemented to facilitate access by disadvantaged groups and eliminate discrimination. ii. Integrate the results of the SA in the Project including the ESMSs. iii. The Project shall be implemented in all the Counties, including where Traditional Local Communities are present (who meet the requirements of ESS7). The Recipient shall ensure that these communities are appropriately informed and can share in the Project benefits in an inclusive and culturally appropriate manner with provisions included in the SEP. 	<ul style="list-style-type: none"> i. Prepare a Social Assessment for Component 1 and 2, consult upon, and disclose it prior to the disbursement for Component 1 and 2. ii. Prior to the disbursement for Component 1. iii. Throughout Project implementation 	<p>The National Treasury</p> <p>The National Treasury</p> <p>Apex PIE</p> <p>CGC and PFIs</p>

	iv. As applicable and in accordance with the relevant national laws and the approved ESMS, and in line with ESS7 requirements. The apex PIE and PFIs, shall cause the MSMEs to carry out scoping, screening and prepare the appropriate tools e.g. ESMP, ESIA prior to disbursement of funds.	iv. Prior to disbursement of funds to MSMEs	MSMEs
ESS8 Cultural Heritage			
8.1	i. In accordance with the relevant national laws, the approved ESMS, and in a manner acceptable to the Association as per the ESS8 requirements, prepare, adopt, and implement and require the Apex PIE and PFIs as applicable to mainstream measures and actions to assess and manage risks and impacts on cultural heritage arising from sub-projects and include these measures in the Environmental and Social Management Plans and the Summary Project Reports (SPR).	i. Throughout Project implementation	The National Treasury Apex PIE CGC and PFIs
ESS9 Financial Intermediaries			
9.1	ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM: i. National Treasury shall develop, adopt, maintain and implement the Project ESMS consistent with ESS9 and in a manner acceptable to the Association as a condition of disbursement. ii. Once established, CGC shall develop, maintain and implement an ESMS consistent with the Project ESMS and ESS9 and in a manner acceptable to the Association. iii. The Apex PIE shall maintain and implement an ESMS consistent with the Project ESMS developed by NT and ESS9. iv. Develop and implement any additional E&S instruments (such as SEP	i. NT ESMS to be prior to the funds disbursement for Component 1 and 2, and thereafter maintained and operated throughout Project implementation. ii. CGC ESMS to be disclosed prior to the disbursement for Component 2 and maintained and operated, throughout Project implementation	The National Treasury Apex PIE CGC and PFIs

	<p>and LMP) or any amendments in the ESMS to support its successful application as may be needed to implement the Project in accordance with the ESSs and to the Association's satisfaction.</p> <p>v. As applicable, require the Apex PIE and PFIs ensure that MSMEs prepare sub-project specific environmental and social management plans (ESMPs) or Summary Project Reports (SPRs) in accordance with the relevant national laws, the approved ESMS, and in a manner acceptable to the Association.</p>	<p>iii. ESMS for the Apex PIE and PFIs assessed and approved by the Association before approval of loans to the Apex PIE and sub-loans by PFIs, and thereafter to be maintained and operated, throughout Project implementation.</p> <p>iv. Complementary instruments to be maintained and operationalized throughout Project implementation.</p> <p>v. As applicable, ESMPs and SPRs to be prepared by MSMEs and approved by PFIs before signing sub-loan agreements</p>	
9.2	<p>PIEs and PFIs ORGANIZATIONAL CAPACITY</p> <p>i. In accordance with ESS9, establish and maintain an organizational capacity and competency for implementing the ESMS with clearly defined roles and responsibilities described under action 1.2.</p>	<p>i. Throughout Project implementation</p>	<p>The National Treasury</p> <p>Apex PIE</p> <p>CGC and PFIs</p>
9.3	<p>SENIOR MANAGEMENT REPRESENTATIVE</p> <p>i. In accordance with ESS9, the PIEs and the PFIs shall designate a senior management representative to have overall accountability for the environmental and social performance of FI subprojects.</p>	<p>i. Throughout Project implementation</p>	<p>The National Treasury</p> <p>Apex PIE</p> <p>CGC and PFIs</p>

9.4	<p>PIEs and PFIs</p> <p>i. The requirements of the Project ESMS prepared by NT shall be integrated to the Apex PIE, PFIs and CGC ESMS, in accordance with ESS9 and in a manner acceptable to the Association. Oblige the PIEs and PFIs to operationalize their ESMS (screening, monitoring and reporting) in a manner acceptable to NT and the Association.</p>	<p>i. Prior to signing of loan agreements with the Apex PIE and PFIs and implemented throughout the Project.</p>	<p>The National Treasury</p> <p>Apex PIE</p> <p>CGC and PFIs</p>
ESS10 Stakeholder Engagement and Information Disclosure			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN:</p> <p>i. The Project shall adopt, disclose and implement a Stakeholder Engagement Plan (SEP) consistent with ESS10, in a manner acceptable to the Association.</p> <p>ii. The stakeholder engagement plan shall be updated to include input from the social assessment and the GBV action plan.</p>	<p>i. SEP disclosed prior to Appraisal and implemented throughout Project implementation.</p> <p>ii. Prior to disbursement of funds to MSMEs and during implementation</p>	<p>The National Treasury</p> <p>Apex PIE</p> <p>CGC and PFIs</p>
10.3	<p>STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE:</p> <p>i. Implement the SEP(s) consistent with ESS10, including the use of different, culturally appropriate communication approaches to ensure communication also with the most vulnerable, including members of VMGs per ESS7, illiterate stakeholders and people with disabilities.</p> <p>ii. Develop a communication plan for NT, Apex PIE and PFIs for Components 1 and 2 of the Project. The communication plan should have dedicated outreach and tailored sessions for women</p>	<p>i. Throughout Project implementation</p>	<p>The National Treasury</p> <p>Apex PIE</p>

	<p>entrepreneurs, youth and PwDs.</p> <p>iii. Monitoring of the stakeholder engagement plan and information disclosure.</p>	<p>ii. prior to disbursement of loans to FIs and MSMEs</p> <p>iii. Every quarter throughout the Project implementation</p>	
10.4	<p>GRIEVANCE MECHANISM:</p> <p>i. Accessible grievance arrangements shall be made publicly available to receive and facilitate the resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Association.</p> <p>ii. GRM shall be updated to reflect the results of the social assessment</p>	<p>i. Throughout Project implementation</p> <p>ii. The SA measures shall be integrated in the GRM prior to disbursement for Component 1.</p>	The National Treasury
10.5	<p>i. The Recipient shall ensure that the Grievance Redress Mechanism (GRM) shall be used to address GBV-related issues and mechanisms to ensure confidentiality and anonymity in reporting with safe and ethical documenting of GBV issues. Further, the GRM shall immediately notify both the NT and the Association of any GBV complaints, with the consent of the survivor.</p> <p>ii. A protocol for handling GBV cases shall be developed and adopted as part of the ESMS.</p>	<p>i. Throughout Project implementation.</p> <p>ii. Adopted prior to the funds disbursement for Component 1 and prior to subloan approval and financing. Thereafter implemented throughout Project implementation.</p>	The National Treasury
CAPACITY BUILDING (TRAINING)			

11.1	<ul style="list-style-type: none"> i. NT shall develop environmental and social MSMEs training toolkit and training manuals. ii. NT will be responsible for the training of the PIs and PFIs on the project's ESMS and management of environmental and social risks and impacts consistent with the ESMS and the ESSs. iii. Training and capacity building reports for the PIs, PFIs and MSMEs will be submitted to the Association. 	<ul style="list-style-type: none"> i. Before disbursement for Component 1. ii. Prior to signing of loan agreements with PIs and PFIs and implemented throughout the Project. iii. Semi-annually (every 6 months) throughout the Project implementation 	<p>The National Treasury.</p> <p>The National Treasury.</p> <p>The National Treasury Apex PIE PFIs</p>
11.2	<ul style="list-style-type: none"> i. NT shall require PFIs to train MSMEs on the Project ESMS and the Environmental and Social requirements under the ESSs. This training will take into account the capacity of the MSMEs. The scope of the training will also include the E&S national requirements and contractual and supervision mechanisms to ensure proper due diligence and compliance monitoring. 	<ul style="list-style-type: none"> i. Prior to financing the beneficiary MSMEs 	<p>The National Treasury</p> <p>PFIs</p> <p>MSMEs</p>