

Kingdom of Cambodia

Land Allocation for Social and Economic Development Project III
(LASED III)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Prepared by:

*Ministry of Land Management, Urban Planning and Construction (MLMUPC)
Ministry of Agriculture, Forestry and Fisheries (MAFF)*

PHNOM PENH, CAMBODIA

April 11, 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Kingdom of Cambodia (hereinafter the **Recipient**) will implement its Land Allocation for Social and Economic Development Project III (LASED III), with the involvement of the following Ministries/agencies/units: Ministry of Land Management, Urban Planning and Construction (MLMUPC); Ministry of Agriculture, Forests and Fisheries (MAFF); National Committee for Social Land Concession (NCSLC), Provincial Land Use Allocation Committees (PLUACs); District Working Groups; and Commune Councils. The International Development Association (hereinafter the Association) has agreed to provide financing for the Project.
2. The Recipient will 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 will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Management Framework (ESMF), Resettlement Policy Framework (RPF), Indigenous Peoples Planning Framework (IPPF), Cultural Heritage Protection Framework (CHPF), Labor Working Condition Procedures (LWCP), and Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S documents.
4. The Recipient is responsible for compliance with all requirements of the ESCP and implementation of measures and actions will be conducted by the Ministries, agencies or units referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will 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, through MLMUPC and MAFF, 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, through MLMUPC and MAFF. The Recipient, through MLMUPC and MAFF will 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, the Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include impacts on project workers, impacts on natural resources and the environment, community health and safety impacts, impacts on land users, impacts on indigenous people, and impacts on cultural heritage.

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 E&S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance redress mechanism (GRM)</p>	<p>Six-monthly starting six months after the Effective Date and throughout Project implementation</p>	<p>MLMUPC, MAFF</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>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 (for example: accident resulting in death or hospitalization of project workers; landmines and explosive remnants of war (ERW) incident; significant chance find of cultural heritage; natural disaster affecting project beneficiaries; civil disturbances at or relating to a project site). Provide sufficient details regarding 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 supervising entity, as appropriate. Subsequently, as per the Association's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence. See also notification of operational health and safety (OHS) requirements in the Labour Management Procedures (LMP) and notification requirements in the ESMP.</p>	<p>Report to the Task Team Leader appointed by the Association or her/his alternate no later than 48 hours after taking notice of the incident or accident; throughout Project implementation.</p>	<p>MLMUPC, MAFF</p>
C	<p>ENVIRONMENTAL AND SOCIAL AUDIT</p> <p>Procure an independent E&S monitoring entity, acceptable to the Association, with expertise in environmental risk management, social risk management and indigenous peoples' issues. Submit to the Association yearly independent monitoring reports, prepared by the independent E&S monitoring entity in accordance with TOR acceptable to the Association, of the timeliness, quality and effectiveness of implementation of the ESCP and of environmental and social risk management measures described in the ESMF and other risk management instruments.</p>	<p>Independent monitoring entity procured within nine months after the Effective Date, and thereafter retained for each subsequent monitoring report.</p> <p>Independent monitoring reports to be submitted to the Association annually starting twelve months after the Effective Date and a mid-term monitoring report submitted one month before the launch of the Association's Mid Term Review Mission (dates to be confirmed with advance notice by the Task Team Leader).</p>	<p>MLMUPC and MAFF for the recruitment of the independent monitoring entity; Independent monitoring entity for the preparation of the independent monitoring reports</p>

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

<p>1.1</p>	<p>ORGANIZATIONAL STRUCTURE Establish and maintain an organizational structure with qualified staff and resources to support management of environmental and social (E&S) risks of the Project, including the following:</p> <ul style="list-style-type: none"> • MLMUPC, MAFF, and each Provincial Project Team to appoint one Focal Point for environmental risk management and one Focal Point for social risk management • Each NGO acting as a project partner also to appoint a Focal Point for environmental and social risk management • One Environmental and one Social Risk Management Adviser to be based in MLMUPC • One Indigenous Peoples (IP) Support Adviser to be based in MLMUPC • At least five Provincial Environmental and Social Risk Management Advisers to support the Provincial Project Teams (in some cases one adviser may support more than one Province) • At each SLC site and ICLT community, relevant technical staff and advisers (such as operations, infrastructure, and agriculture advisers), and a Local Agriculture Facilitator will regularly support E&S activities as indicated in their Terms of Reference • Additional short-term expertise as needed, including an independent Safety of Dams expert in the case of activities to which the relevant provisions of ESS3 apply. 	<p>Focal Points and Facilitators to be appointed before the commencement of Project activities Recruitment of advisers to be completed within 90 days after the Effective Date. All E&S staff specified in action 1.1 to be maintained throughout Project implementation</p>	<p>MLMUPC MAFF Provincial Project Teams Project Partner NGOs</p>
<p>1.2</p>	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT Undertake an Environmental and Social Assessment (ESA), including site-specific assessments for the first sites identified for SLC investments and building on the assessment of environmental and social risks integrated into the ESMF prepared for the Project, in a manner acceptable to the Association. Without limitation to the foregoing, the ESA will further assess ICLT risks and issues before financing of ICLT activities, as per action 7.1 below. Without limitation to the foregoing, site-specific assessments will be undertaken during site planning for sites identified in subsequent phases, following the provisions of the ESMF, as per action 1.3 below.</p>	<p>ESA will be started 30 days after recruitment of the E&S advisers and finalized before any site-specific investments and not later than nine months after the Effective Date.</p>	<p>MLMUPC, MAFF</p>

<p>1.3</p>	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>Implement, and, as needed, update and re-disclose, the ESMF prepared for the Project, in a manner acceptable to the Association. For specific Project sites (selected Social Land Concession sites and sites for which indigenous communities apply for Indigenous Community Land Titles) and sub-projects, apply the ESMF, SEP, LWCP, RPF, IPPF and CHPF, including carry out environmental and social screening and assessment to identify E&S risks and impacts and recommend appropriate mitigation measures.</p> <p>Subject to the outcome of the Spatial Planning Screening process, in accordance with the ESMF, prepare and disclose regional ESIA for new SLC sites in a manner acceptable to the Association, and submit ESIA to the Association for review and no-objection.</p> <p>Based on the E&S screening and assessments, prepare, adopt and implement site-specific ESMPs, and other E&S risk management plans as needed, in accordance with the ESMF, SEP, LWCP, RPF, IPPF and CHPF. Submit plans to the Association for review and no-objection, and disclose such plans on the Project website and to the Project affected communities and consult the affected communities in accordance with the ESMF.</p> <p>As needed, the above referenced E&S risk management plans include (see additional details under the respective ESSs below):</p> <ul style="list-style-type: none"> • Environmental and Social Management Plan (all sites) • Stakeholder Engagement Plan (all sites) • Explosive Remnants of War (ERW) risk management plan • Resettlement Plan (in any case where involuntary resettlement is necessary) • Indigenous Peoples Plan (IPP) (for SLC sites where indigenous peoples may be affected and for ICLT sites) • Cultural Heritage Protection Plan • Occupational Health and Safety Plan (OHSP) 	<p>Prepare, and disclose and consult site-specific and sub-project specific ESMPs and other E&S risk management plans, and obtain the Association's no-objection to such plans, prior to land allocation, land titling and commencement of site-specific/sub-project activities, and implement such plans through the sub-project implementation.</p> <p>Prepare regional ESIA, when needed, prior to finalization of site-specific designs and selection of investments.</p>	<p>MLMUPC MAFF</p> <p>Provincial Project Teams</p> <p>RPs will be prepared by the General Department of Resettlement of MEF for impacts that are covered by the Standard Operating Procedures for Land Acquisition and Resettlement (SOP-LAR)</p>
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1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP and the relevant E&S documents including the Labor Management Procedures, into the ESHS specifications of the procurement documents with contractors. Thereafter, ensure that the contractors comply with the ESHS specifications of their respective contracts.</p> <p>In line with the principle of proportionality, there will be a full ESHS specification for contracts procured at national level and a simplified ESHS specification for contracts for small works procured by Commune Councils. Both specifications will have standard provisions and special provisions based on the sub-project ESMP.</p>	<p>ESHS specifications to be included in procurement documents, and monitored and implemented throughout the contract implementation period for any sub-project</p>	<p>MLMUPC and MAFF (national procurement) Design engineers / infrastructure advisers Commune Councils Contractors Supervising Engineers</p>
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Update, adopt, and implement the Labor and Working Conditions Procedures (LWCP) that have been developed for the Project, in a manner acceptable to the Association. The LWCP will be updated to include:</p> <ul style="list-style-type: none"> • Occupational Health and Safety • Fair Treatment and Non-Discrimination • Prevention of Forced Labor and Restrictions on Child Labor • Workers' Organizations • Workers' Grievances <p>The following additional instruments, as Annexes to the LWCP, are to be developed during the Project inception period:</p> <ul style="list-style-type: none"> • Occupational Health and Safety Plan for direct project workers and with particular attention to risks arising from travel to and work at remote sites; • Terms and Conditions of Employment for direct project workers; • Environmental, Social, Health and Safety Specifications including labor management and OHS provisions for contracted workers; • Community Labor Management Procedure; • Works Risk Assessment Format; and • Works Site Occupational Health and Safety Plan. <p>The scope and application of these documents are described in LWCP Annex 3.</p>	<p>LWCP will be updated and disclosed within sixty days after the Effective Date, and implemented, and further updated if needed, throughout Project implementation.</p> <p>OHSP for direct project workers prepared and disclosed within six months after the Effective Date (NB this timeframe allows for project workers to be consulted on the OHSP)</p> <p>Further Annexes to the LWCP will be developed, submitted to the Association for No-objection and disclosed within 6 months after the Effective Date.</p> <p>No works contracts or community works will commence before relevant instruments receive no-objection from the Association.</p>	<p>MLMUPC and MAFF</p> <p>Provincial Project Teams Project Partners Contractors and suppliers</p>

2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain, and operate a grievance mechanism for direct and contracted Project workers, as described in the LWCP and consistent with ESS2 and in a manner acceptable to the Association.</p> <p>Establish proportionate rules, to be included in the ESHS specifications, to ensure that all contracted workers are aware of (a) their rights to express grievances; (b) where to address a grievance in the first instance; (c) what action they can expect as of right when a grievance is expressed; and (d) that they are adequately protected against sanctions or recriminations. Contractors with workforces of more than 10 people engaged on Project work for periods of more than 1 month will be required to show that they have an established internal grievance mechanism meeting the required standards.</p>	<p>Grievance Mechanism for Direct Project Workers to be established and operational within one month after the Effective Date, and operated throughout Project implementation.</p> <p>Grievance Mechanism for contracted workers to be established and operational before start of works or performance of services, and operated throughout Project implementation.</p>	MLMUPC, MAFF Contractors
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES FOR DIRECT WORKERS Occupational Health and Safety (OHS) measures for direct project workers are outlined in the ESMF and the LWCP and will be implemented through an Occupational Health and Safety Plan which will be prepared in consultation with project workers. Risks associated with travel to and work at remote sites (road safety, security, avoidance of infection) will be a key focus of the OHSP</p>	OHSP to be adopted within six months after the Effective Date (allowing time for the OHSP to reflect concerns of project staff), and implemented throughout Project implementation	MLMUPS MAFF NCDSS Commune Councils
2.4	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES FOR CONTRACTED WORKERS Occupational Health and Safety measures for contracted workers are outlined in the ESMF and the LCWP and will be implemented through the standard ESHS Specifications to be included in contract documentation</p>	ESHS specifications to be included in all contract documents for works and services throughout Project implementation	MLMUPS MAFF Commune Councils Contractors and Service Providers Supervising Engineers
2.5	<p>AWARENESS RAISING AND TRAINING Develop an easy-to-understand illustrated booklet in Khmer language setting out labor and working conditions requirements of the Recipient's law and ESS2 as they apply to contracted workers. Disseminate the booklet to Project staff, contractors, contracted workers and other stakeholders.</p> <p>Develop a short training course on the standard ESHS specifications including labor and working conditions. Deliver the training course to contractors and contractor's supervisory staff.</p>	<p>Awareness raising booklet to be prepared before implementation of first works contract under the Project.</p> <p>Training courses in each province conducted in year 2.</p> <p>Refresher trainings as needed.</p>	MLMUPC, MAFF

ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT		
3.1	<p>RESOURCE EFFICIENCY</p> <p>Resource use efficiency measures will be covered in the ESMP for each Project site, in a manner acceptable to the Association, and will include a water resources assessment for each site.</p> <p>No irrigation development will be carried out without confirming that proposed withdrawals (in the final design) are sustainable without negative impacts on existing users and / or ecosystem services</p>	<p>For all SLC and ICLT activities, before preparation of infrastructure and livelihoods plan, and implemented throughout the Project implementation period.</p> <p>Provincial project teams Technical design consultant</p>
3.2	<p>POLLUTION PREVENTION AND MANAGEMENT</p> <p>Pollution prevention and management measures will be covered in the ESMP for each Project site, in a manner acceptable to the Association, and will include the following provisions:</p> <ul style="list-style-type: none"> • Follow MAFF’s good agriculture practices Guideline as part of the ESMF • Encourage use of renewable energy technologies wherever appropriate, including for water pumping in preference to diesel pumps • Raise awareness to discourage charcoal production. • Planting of trees in common areas of SLC and ICLT sites • Farmers to receive training on safe use and disposal of agriculture chemicals and solid non-biodegradable waste as standard element of extension packages • Solid waste management plans to be prepared and implemented for all sites. This is especially critical at SLC sites where land recipients are resettled in large and relatively densely populated residential areas • Avoid or minimize air, water and land pollution and noise pollution from civil works through control of works, dust prevention measures, proper management of hazardous and non-hazardous site wastes and surplus materials, to be specified in the ESHS specifications 	<p>Throughout Project implementation</p> <p>MLMUPC MAFF Provincial Project Teams Contractors Supervising Engineers</p>
ESS 4: COMMUNITY HEALTH AND SAFETY		
4.1	<p>SAFETY OF DAMS</p> <p>All irrigation infrastructure or small-scaled dams constructed under the Project will be subject to a dam safety screening. For any large or high-risk dams that may (unlikely) be used for water schemes under the Project, a dam safety assessment will be carried out by independent experts to the standards of ESS4 and in a manner acceptable to the Association.</p> <p>If the dam poses any risk to the Project location and / or Project beneficiaries, an early warning and emergency response plan will be prepared in a manner acceptable to the Association. All other relevant dam safety measures for small or large dams, as applicable, will be implemented in accordance with ESS4.</p>	<p>During the preparation of feasibility study and design of irrigation sub-projects, throughout Project implementation.</p> <p>Design engineers Independent dam safety specialists (for large or high-risk dams)</p>

4.2	<p>EXPLOSIVE REMNANTS OF WAR (ERW)</p> <p>All Project sites to be assessed for the presence of ERW, including by consultation with Cambodian Mines Action Authority (CMAA) / Cambodian Mines Action Centre (CMAC).</p> <p>If a significant ERW risk is identified, an ERW risk management plan will be prepared and implemented in consultation with the CMAA and / CMAC and may include some or all of the following:</p> <ul style="list-style-type: none"> • Awareness raising • Demarcation of areas of high risk • Areas to be cleared of ERW before implementation of Project activities in those areas or other actions that could expose Project affected parties to increased risk. <p>The Recipient will develop a protocol, to be included in the ESHS specifications, for action to be taken in the event that ERW are encountered unexpectedly</p>	<p>Initial screening of Project sites</p> <p>Further screening may be needed after location of site access roads is determined. ERW risk management plans implemented throughout the Project implementation period.</p>	<p>Provincial project team, in consultation with CMAA / CMAC</p>
4.3	<p>PREVENTION OF INFECTIOUS DISEASE TRANSMISSION</p> <ul style="list-style-type: none"> • Vector-borne disease risks will be assessed in preparation of the ESMP at each Project site • Health awareness training will be provided to Project beneficiaries at all sites and will include (1) avoidance of water-borne diseases; (2) avoidance of vector-borne diseases; and (3) avoidance of sexually transmitted diseases. • Effective best-practice sanitation campaigns to aim at achieving 100% latrine use to be conducted at all project sites. • Where contractors' workers will be present at a site camp for more than one month, STD prevention training will be provided to contractors' workers. 	<p>Risk assessment as part of screening and ESMP at each project site</p> <p>Health awareness and sanitation campaigns at each project site</p> <p>STD prevention training at start of works on a sub-project</p> <p>All measures implemented through the Project implementation period</p>	<p>Provincial Project Team</p> <p>Contractors</p>
4.4	<p>HEALTH RISKS FROM CONTAMINATED WATER SUPPLIES</p> <ul style="list-style-type: none"> • Surface water and shallow aquifer groundwater supplies to be tested for chemical pollutants, particularly where commercial agriculture or mining operations are present upstream of the Project sites • Deep aquifer groundwater supplies tested for arsenic • All water supplies tested for pathogens • Appropriate action taken in case water is found not to match WHO drinking water standards (includes labelling of non-potable supplies, awareness raising, ensuring availability of potable water) 	<p>SLC sites: before settlement of land recipients on SLC</p> <p>ICLT: existing supplies tested during sub-project planning phase</p> <p>New supplies tested before use begins</p> <p>Follow-up measures implemented throughout the Project implementation period</p>	<p>Provincial Project Teams</p> <p>Testing by Ministry of Rural Development laboratory</p>

4.5	<p>ROAD SAFETY</p> <ul style="list-style-type: none"> • All site access road sub-projects / road sub-projects designed and implemented from national level to have road safety review at design stage • Road safety training for communities implemented through construction contracts, using approved sub-contractors' materials and methodology • Additional measures for road safety of project direct workers addressed under direct worker OHS plan 	Throughout Project implementation	MLMUPC, MAFF Design engineers Provincial Project Team Construction contractors (deliver road safety training through approved sub-contractors)
4.6	<p>NUTRITION</p> <ul style="list-style-type: none"> • Project to conduct study of impacts of settlement on SLC on diets of children (may prove positive or negative) • Project to provide nutrition awareness and advice to SLC and IP communities, including awareness of the impacts of changed diet and opportunities to improve (home gardening, cooking classes) 	<p>Study to be conducted within 1 year after the Effective Date of the Project.</p> <p>Nutrition classes to be provided throughout the Project implementation</p>	MLMUPC, MAFF Consultants Women and Children's Committees (Province / District / Commune levels)
4.7	<p>GENDER BASED VIOLENCE</p> <p>Assess GBV risks as per 1.2 and 1.3 for SLC and ICLT sites and integrate risk management measures in ESMPs in a manner acceptable to the Association.</p> <p>The Project will support formation and / or strengthening of Women and Children's Committee structures at SLC and ICLT sites, with a specific activity to identify and support victims of GBV.</p>	<p>Throughout Project implementation</p> <p>Throughout Project implementation</p>	Provincial Project Teams Women and Children's Committees (Province / District / Commune levels)
4.8	<p>UNIVERSAL ACCESS TO SERVICES</p> <ul style="list-style-type: none"> • Access of elderly, disabled or otherwise disadvantaged groups to be ensured for all facilities/services provided under the Project • All infrastructure to be designed for universal access. Specifically, schools, health facilities etc. to be designed for wheelchair access 	Throughout Project implementation	MLMUPC, MAFF Design consultants Provincial Project Teams
4.9	<p>COMMUNITY SAFETY DURING SITE WORKS</p> <p>Standard ESHS specifications to require contractors to exclude the public and especially children from the vicinity of site works. Where no physical barrier is provided, a watch-person / flag-person to be present where machines are working to warn away passers-by and alert machine operator of risks.</p>	During construction works	MLMUPC, MAFF Provincial Project Teams Construction Contractors Supervising Engineers

ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>AVOIDING INVOLUNTARY RESETTLEMENT</p> <p>The Project will seek to avoid involuntary resettlement / involuntary physical or economic displacement wherever possible, through:</p> <ul style="list-style-type: none"> • Careful identification of existing land users including legal owners, other types of occupants, and users who gain livelihoods from the land without occupying it (e.g. Common Property Resource (CPR) users) • Excluding land for which a legitimate private claim exists, from SLC or ICLT land • Providing compensatory benefits including SLC land allocations where appropriate • Engaging with affected parties to find mutually agreeable solutions including preserving access to CPR. • Planning of infrastructure including access roads to avoid or minimize land acquisition 	<p>During land identification, mapping, titling and land allocation of SLC</p> <p>During ICLT land mapping and titling process</p> <p>During planning of infrastructure sub-projects</p>	<p>MLMUPC, MAFF Provincial Project Teams Commune Councils Local Communities Design engineers</p>
5.2	<p>RESETTLEMENT PLANS</p> <p>Where involuntary resettlement is necessary, the Project will prepare, disclose, consult, adopt, and thereafter implement resettlement plans (RPs) in accordance with ESS 5 and consistent with the requirements of the Resettlement Policy Framework (RPF) that has been prepared for the Project, in a manner acceptable to the Association.</p>	<p>Prepare, disclose, consult, adopt and implement RPs before implementation of works that involve land acquisition or resettlement.</p>	<p>PMO [Provincial entity responsible for SLC/ICLT] of MLMUPC for impacts that are not covered by SOP-LAR</p> <p>RP will be prepared and implemented by MEF-General Department of Resettlement for impacts that are covered by SOP-LAR</p>
5.3	<p>GRIEVANCE MECHANISM</p> <p>Where an RP is prepared and implemented, a Grievance Redress Mechanism (GRM) meeting the requirements of ESS5 will be established for affected parties, as described in the RPF.</p>	<p>Establish and implement prior to land acquisition and resettlement and throughout Project implementation</p>	<p>PMO [Provincial entity responsible for SLC/ICLT] of MLMUPC for impacts that are not covered by SOP-LAR</p> <p>Provincial Grievance Redress Committee (PGRC) to be established by MEF-GDR</p>

ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>As part of the ESMF specified in subsection 4.3.6, develop and implement land use procedure and subproject screening form to ensure no biodiversity risks and impacts result from the proposed infrastructure.</p> <ul style="list-style-type: none"> • Identify biodiversity hotspots and exclude them from land allocated as SLC or ICLT sites, in accordance with law • Establish buffer zones between SLC and biodiversity hotspots. These buffer zones to be included in the Commune Development Plan • In any case where biodiversity hotspots exist contiguous with ICLT land, facilitate discussions with mandated authority to agree role for IP in management of hotspot • Raise awareness of community for conservation of biodiversity 	<p>During land identification, mapping and State Land Titling (SLC)</p> <p>During implementation of activities at each site (SLC and ICLT)</p>	<p>MLMUPC Provincial Project Teams Provincial Department of Environment Provincial Department of Agriculture Forests and Fisheries IP Communities NGOs with expertise in conservation and community forest management</p>
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	<p>Establish technical working group with key experts including participation of indigenous peoples' organization and support NGOs, to support the PMU of MLMUPC with the following activities to inform a revised IPPF prior to any ICLT activities:</p> <ul style="list-style-type: none"> • Assess experiences to date regarding opportunities, risks, and design and implementation features of the ICLT titling activities already undertaken by the government, including legal issues concerning conflicting claims regarding inclusion or exclusion of forest land; • Assess the current ICLT system and procedures (legal and institutional) to identify areas for simplification and/or efficiency gains, and to include provisions to enhance the social assessment, consultation and free, prior and informed consent (FPIC) process in view of national and ESS7 requirements; • Consult relevant stakeholders on ICLT activities, potentially including experts and experiences from other countries; and • Undertake social and cultural profiles of identified ICLT communities, considering also the tangible and intangible cultural heritage in accordance with the Cultural Heritage Protection Framework (CHPF). 	<p>Submit ESA report and revised IPPF for the Association's no-objection within nine (9) months after the Effective Date and before any site-specific ICLT activities commence</p>	<p>PMO of MLMUPC</p>
7.2	<p>INDIGENOUS PEOPLES PLAN:</p> <p>Prepare, adopt, and implement site-specific Indigenous Peoples Plans (IPPs) consistent with the requirements of the Indigenous Peoples Planning Framework (IPPF) that has been prepared for the Project and ESS7, including provisions for Free Prior Informed Consent when required, in a manner acceptable to the Association.</p>	<p>During site or sub-project planning and prior to implementation of sub-project activities at any site (SLC or ICLT) where an IP community is affected (whether positively or adversely).</p>	<p>PMO of MLMUPC responsible in cooperation with: Provincial Project Teams IP community leaders Community Facilitators recruited from the IP community (ICLT) Specialist intermediaries (NGO) for SLC affecting IP</p>

7.2	<p>GRIEVANCE MECHANISM</p> <p>Grievances within the IP community (e.g. over use rights of ICLT land) to be addressed in the first instance through culturally appropriate means within the community, without prejudice to the right of access to the Project GRM</p> <p>Other grievances to be addressed through the Project GRM. To facilitate IP access to the GRM, the Project will support and pay the costs of a facilitator, chosen by the complainant from within the IP community and conversant in the IP language or dialect, who will serve as an advocate for the complainant during the process and ensure the rights of the indigenous minority are protected.</p>	Throughout Project implementation	MLMUPC, MAFF Provincial Project Teams IP Communities
ESS 8: CULTURAL HERITAGE			
8.1	<p>EXCLUSION OF CULTURAL HERITAGE SITES FROM LAND TITLING</p> <p>Sites of tangible cultural heritage will be identified and excluded from the area of SLC land</p> <p>Sites of tangible cultural heritage within the proposed area of ICLT will be identified and solution discussed with relevant mandated authority. Where the cultural heritage is important to IP community, inclusion in the ICLT and / or IP participation in management to be favored, consistent with the Recipient's legal requirements.</p>	During land identification, mapping, titling and land use planning	MLMPUC, MAFF Provincial Project Teams Provincial Department of Culture and Fine Arts Apsara Authority (in certain areas of Siem Reap Province, if there are Project activities in those areas) IP communities
8.2	<p>CHANCE FINDS</p> <p>Prepare, adopt, and implement the chance finds procedure described in the ESMF developed for the Project. Chance finds procedure to be included in ESHS specification for works contracts</p>	Chance finds procedure adopted before site works (land clearing or infrastructure sub-projects) begin	MLMUPC, MAFF Provincial Project Teams Construction Contractors Provincial Department of Culture and Fine Arts
8.3	<p>INTANGIBLE CULTURAL HERITAGE</p> <p>Risk to intangible cultural heritage to be evaluated through stakeholder engagement, particularly with IP, and through expert intermediaries where necessary. Ensure that the ICLT process is community-led to the greatest extent possible, and IP are facilitated to identify and evaluate risks</p>	Throughout Project implementation, particularly during planning stage of ICLT (see section 7 above). Plans to be finalized prior to commencement of works.	MLMPUC, MAFF Provincial Project Teams IP Communities
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Update, adopt, and implement the project Stakeholder Engagement Plan (SEP) in a manner acceptable to the Association.</p> <p>For each Project site (SLC and ICLT) prepare, adopt and implement a site-specific SEP consistent with the Project SEP in a manner acceptable to the Association,</p>	<p>Project SEP implemented throughout Project implementation</p> <p>Site-specific SEPs prepared before the start of activities at any new project site (SLC or ICLT), and implemented throughout the sub-project implementation period.</p>	MLMUPC, MAFF Provincial Project Teams Stakeholders

10.2	<p>PROJECT GRIEVANCE MECHANISM Prepare, adopt, maintain and operate a grievance mechanism, as described in the SEP.</p>	Project GRM to be operational and disseminated to stakeholders within three months after project effectiveness, and maintained throughout Project implementation	MLMUPC, MAFF Provincial Project Teams Project Partners (NGOs) Stakeholders
CAPACITY SUPPORT (TRAINING)			
CSI	<p>E&S RISK MANAGEMENT CAPCITY BUILDING PLAN Implement the capacity building plan for E&S risk management described in the ESMF, with the following outcomes</p> <ul style="list-style-type: none"> • All project IA staff familiar with principles and tools of E&S management • E&S risk management advisers, focal points and other key staff able to identify E&S risks and develop risk management measures consistent with the ESMF, lead or advise on E&S risk management, deliver trainings and monitor and report on E&S risk management • Provincial Project Teams understand tools and methods of stakeholder engagement including with IP • GRM established and operating effectively • E&S risk management measures integrated in sub-project designs • Contractors and suppliers understand and can implement their E&S obligations (ESHS specifications) • Improved environmental management and sanitation at SLC • Access roads incorporate road safety design features • Improved community road safety awareness • 	<p>Training of project staff on understanding of E&S risk management instruments to be completed within six months after project effectiveness, with refresher courses twice a year and adapted training based upon implementation experience of project.</p> <p>Training materials for all topics to be developed in first year of project effectiveness</p> <p>Trainings to contractors, suppliers and project beneficiaries before site-specific project activities and throughout project implementation, as needed</p>	<p>Training program overseen by MLMUPC / national E&S risk management advisers</p> <p>MAFF</p> <p>Capacity building experts and subject specialists as needed</p>