

**Republic of Uganda
Investment for Industrial Transformation and
Employment (INVITE) – P171607**

**ENVIRONMENTAL and SOCIAL
COMMITMENT PLAN (ESCP)**

6 December 2021

**THE REPUBLIC OF UGANDA/MINISTRY OF FINANCE, PLANNING AND ECONOMIC DEVELOPMENT
(MOFPED), PRIVATE SECTOR FOUNDATION UGANDA (PSFU), BANK OF UGANDA (BOU)**

Investment for Industrial Transformation and Employment (INVITE)

Project Environmental and Social Commitment Plan (ESCP)

1. The Republic of Uganda is planning to implement the Investment for Industrial Transformation and Employment (the *Project*), with the involvement of the following Ministries/agencies/units: Ministry of Finance and Economic Development (MoFPED), the Bank of Uganda (BOU), and Private Sector Foundation Uganda (PSFU). The *International Bank for Reconstruction and Development/International Development Association hereinafter referred to as the Bank/the Association (IBRD/IDA)* has agreed to provide financing for the Project.
2. *Ministry of Finance Planning and Economic Development* shall ensure that the Private Sector Foundation Uganda and Bank of Uganda, implement material measures and actions so that the Project is implemented in accordance with the World Bank Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out a summary of the material measures and actions.
3. Where the ESCP refers to specific plans or other documents, whether they have already been prepared or are to be developed, the ESCP requires compliance with all provisions of such plans or other documents. In particular, the ESCP requires compliance with the provisions set out in BoU and PSFU project Environmental and Social Management Frameworks (ESMF), the Environment and Social Management Systems (ESMS) for Participating Financial Institutions (PFIs), Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), E&S Integration Plan, E&S Capacity Building Plan, and where applicable Resettlement Action Plans and Vulnerable and Marginalized Groups plans, which will be developed.
4. The table below summarizes the material measures and actions that are required as well as the timing of the material measures and actions. *Ministry of Finance Planning and Economic Development* is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Project Management Teams (PMT) in PSFU and BOU.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the World Bank by *PSFU and BOU* as required by the ESCP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Bank and the Borrower, 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 Borrower will agree to the changes with the Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Bank and the Republic of Uganda. The later will promptly disclose the updated ESCP. Depending on the project, the ESCP may also specify the funding necessary for completion of a measure or action.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the World Bank and Republic of Uganda will agree on the sources of additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include risks and impacts that are relevant to the Project, such as environmental, health, and safety impacts, labor influx, poor working conditions gender-based violence, exclusion risks and inadequate stakeholder engagement

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ESCP Monitoring and Reporting

	<p>REGULAR REPORTING: The Project Management Teams (PMTs) at PSFU and BOU shall prepare and submit regular monitoring reports on the implementation of the ESCP</p>	<p>Quarterly E&S compliance reports and consolidated annual reports throughout project implementation</p>	<p>PSFU via PMT and BOU via PMT</p>
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	<p>INCIDENTS AND ACCIDENTS NOTIFICATION: In case of occurrence of a significant ESHS accident or incident, PSFU and BOU shall inform the Bank within 24 hours of the occurrence of the incident /accident providing sufficient detail and indicating immediate measures taken to address it.</p>	<p>Within 24 hours of occurrence of the significant ESHS incident of accident</p>	<p>PSFU via PMT and BOU via PMT</p>
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SUMMARY ASSESSMENT

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

<p>1.1</p>	<p>ORGANIZATIONAL STRUCTURE: The INVITE project will be implemented by PSFU and BoU through their respective Project Management Teams that will be established with the responsibility for overall coordination and management of the project. In particular:</p> <p>(a) PMT at the Private Sector Foundation Uganda (PSFU) will implement Subcomponent 2.3 and Component 3 and the Multi Donor Trust Fund (MDTF).</p>	<p>Not later than 30 days after the effectiveness (Effective Date) of the MDTF Grant Agreement</p>	<p>PSFU via PMT</p>
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<p>PSFU will designate at least one social and one environmental specialist that shall be responsible for the day-to-day E&S performance during project implementation.</p> <p>(b) BoU will be managing all Component 1 activities and some Component 2 (2.1 and 2.2). BoU will, within its INVITE project PMT, designate at least one social and one environmental specialist that shall be responsible for the day-to-day E&S performance related to the BoU ESMF and the PFIs and their ESMSs during project implementation. This is further addressed under ESS9 section of the ESCP</p> <p>(c) Consistent with the BoU ESMF for INVITE Trust, BoU will ensure that each PFI has a qualified E&S staff in place to support implementation of the PFI’s ESMS and, in particular, be responsible for E&S screening of lending or other forms of financial support provided by the PFIs to their borrowers from the proceeds of the IDA funds under INVITE as well as</p>	<p>Not later than 30 days after the effectiveness of the MDTF Grant Agreement</p> <p>Before disbursement of IDA financing proceeds from BoU to corresponding PFI</p>	<p>BoU via PMT</p> <p>BoU via PMT</p>

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	<p>provides a written commitment to BoU to participate in E&S trainings to be provided by BoU to the PFIs</p>		
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT:</p> <p>BoU will prepare, consult upon, adopt, implement and publicly disclose an ESMF for INVITE Trust that will:</p> <ul style="list-style-type: none"> a) Clearly stipulate what standards PFI must apply to INVITE financing (national regulations, E&S List of Excluded Activities, and World Bank ESSs, where applicable) b) The ESMF will also contain documents Labor Management Procedures, Vulnerable and Marginalized Groups Framework, Stakeholder Engagement Plan, and Resettlement Policy Framework insofar it relates to project components managed by BoU c) Outline in detail BoU’s procedures for E&S due diligence on PFIs’ ESMS and PFI ESMS requirements as well as specific activities financed under INVITE 	<p>Before disbursement of IDA funds to BoU to implement and of the Parts 1, 2.1 and 2.2 of the Project</p>	<p>BoU via PMT</p>

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<ul style="list-style-type: none"> d) State roles and responsibilities of BoU and PFIs in E&S due diligence and monitoring of specific activities financed under INVITE e) Contain reporting formats and requirements for PFIs to report at least annually to BoU on ESMS implementation as well as screening and monitoring outcomes of specific activities financed under INVITE Trust, and reporting requirements as stated in ESCP Incidents and Accidents and Notification f) Stipulate that ESMS shall be a disbursement condition from BoU to PFIs for INVITE Trusting and contain sample E&S language for the BoU financing agreement / master financing agreement with PFIs. g) Contain an E&S Integration Plan containing specific provisions for incorporating E&S due diligence, monitoring, and reporting under each INVITE project component (such as E&S provisions for the MSME application web-based platform under component 1, ESMS at the PFI level under component 2). The E&S Integration Plan will contain 		

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<p>specific time-bound actions and practical steps for integrating E&S risk management into the activities supported by INVITE, including the specific tools to be integrated into the deal flow for each financial transaction type supported under INVITE (e.g. receivables financing)</p> <p>h) Based on the E&S Integration Plan approved by the World Bank, prepare specific tools for implementation by PFIs to screen and mitigate E&S risks in transactions supported by the World Bank and require application of such tools by PFI in the legal agreements between BOU and PFIs related to WB-supported financing under the project; the tools will not be part of any project manuals, they will be separate tools and aren’t really documents (examples are screening questionnaires or checklists) that will be used by PFIs to embed into their lending processes</p> <p>i) In line with ESMF, E&S Capacity Building Plan (a stand-alone document as specified under ESS9 with the corresponding timeframe)</p>		

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<p>PSFU shall put in place the following instruments and actions:</p> <p>(i) PSFU shall prepare, consult upon, adopt and publicly disclose an ESMF and other framework documents (Labor Management Procedures, Vulnerable and Marginalized Groups Framework, Stakeholder Engagement Plan and Resettlement Policy Framework insofar it relates to project components managed by PSFU) to manage Project E&S risk and impacts; these instruments can be stand-alone or combined into one document.</p> <p>(ii) Consistent with the ESMF and other framework documents referred to in (i) above, PSFU shall incorporate appropriate E&S clauses in all grant agreements, including ESHS conditions, to ensure that grant recipients develop and implement subproject E&S instruments to manage E&S risks and impacts of activities financed from the IDA funds as defined in the PSFU ESMF (which does not cover PFIs)</p>	<p>Before disbursement of IDA funds to PSFU to implement Part 2.3 of the Project</p> <p>Before disbursement of IDA proceeds from PSFU to each grant recipient</p>	<p>PSFU via PMT</p> <p>PSFU via PMT</p>

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<p>(iii) Ensure grant proposals under component 2.3 are screened for E&S risks as provided for in ESMF and corrective action plans put in place to mitigate E&S risks and impact of the MSMEs</p> <p>(iv) Ensure the relevant WB ESSs are complied with and ensure that prepare risk assessment and management instruments, such as ESIA, ESMPs, and other related instruments are prepared and disclosed by grant recipients</p> <p>(v) Supervise ESHS aspects during grant implementation</p> <p>(vi) Conduct quarterly monitoring and reporting on compliance of grant recipients with E&S requirements and provide annual E&S reports to the World Bank (grant recipients will need to report to PSFU to enable this)</p>	<p>Ongoing, during implementation after initial disbursement of the IDA financing proceeds to PSFU</p> <p>Ongoing, during implementation after initial disbursement of the IDA financing proceeds to PSFU</p> <p>Ongoing, during implementation after initial disbursement of the IDA financing proceeds to PSFU</p> <p>Quarterly/ annually, during implementation after initial disbursement of the IDA financing proceeds to PSFU</p>	<p>PSFU via PMT</p> <p>PSFU via PMT</p> <p>PSFU via PMT</p> <p>PSFU via PMT</p>
<p>1.3. Consistent with the BoU ESMF for INVITE Trust, BoU shall:</p>		

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(i) Incorporate appropriate environment and social clauses in all agreements signed with PFIs to ensure that each PFI develops and/ or strengthens their ESMS, as appropriate	Before disbursement of IDA proceeds from BoU to corresponding PFI	BoU via PMT
(ii) Monitor and supervise the E&S performance of the PFIs and their portfolio exposures on the credit line and ensure that each PFI monitors the entire WB-financed portfolio and report to BoU, in a manner which is acceptable to the World Bank	Ongoing, during implementation after initial disbursement of the IDA financing proceeds to BoU to	BoU via PMT
(iii) Supervise PFI to ensure that subproject sponsors prepare and disclose all risk assessment and management instruments (ESIA/ESMPs, ESA etc.) for factories/ structures/ facilities and other infrastructure financed under component 2 in line with BoU ESMF, relevant national laws, PFI's ESMS (commensurate to the risks) and WB ESSs	Ongoing, during implementation after initial disbursement of the IDA financing proceeds to BoU	BoU via PMT
(iv) For component 1 activities, ensure that PFIs conduct adequate screening and monitoring of MSME support they provide from the INVITE Trust proceeds in accordance with national legislation and BoU ESMF (including the E&S Integration Plan) and incorporate such screening and monitoring into their lending / financing	Ongoing, during implementation after initial disbursement of the IDA financing proceeds to BoU	BoU via PMT

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	<p>processes for each financial instrument for which they avail financing from the INVITE Trust proceeds and corrective action plans put in place to mitigate E&S risks and impact of the MSMEs</p>		
1.4	<p>PERMIT, CONSENTS AND AUTHORIZATIONS:</p> <p>PSFU and BoU shall ensure that subproject owners/ entities, obtain, as appropriate, the permits, consents and authorizations that are applicable to the project from relevant national authorities.</p> <p>PSFU and BoU shall cause to comply, as appropriate, with the conditions established in these permits, consents and authorizations throughout project implementation.</p>	<p>Prior to commencement of any works on each subproject</p>	<p>BoU via PMT and PSFU via PMT</p>
1.5	<p>THIRD PARTY MONITORING:</p> <p>PSFU and BOU shall identify a third-party monitor (Independent individual or firm) to undertake Environmental and Social Audit(s) under the Project</p> <p>The third-party monitor shall undertake annual Environmental and Social Audits, intended to</p>	<p>12 months after the date of corresponding initial disbursement of IDA financing proceeds to BoU and PSFU and subsequently every six months</p>	<p>PSFU via PMT and BoU via PMT</p>

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	complement and verify the monitoring of environmental and social risks and impacts of the Project.		
1.6	<p>E&S List of Excluded Activities:</p> <p>BoU and PSFU will ensure that the following List of Excluded activities is incorporated in their respective ESMFs (and subsequently - consistent with the respective ESMFs for BoU and PSFU - in the agreements with PFIs, as well as each PFIs' ESMS (NOT valid without footnotes):</p> <ol style="list-style-type: none"> 1. Production or trade in any product or activity deemed illegal under laws or regulations of Uganda or international conventions and agreements. 2. High risk category activities in accordance with the Government of Uganda regulations. 3. Production or trade in weapons or ammunitions.¹ 4. Gambling, casinos and equivalent enterprises.¹ 	<p>Before disbursement of IDA funds to BoU and PSFU intended implementing their respective parts of the Project (other than parts 3 and 4 funded through MDTF resources)</p> <p>Incorporation in the agreements with PFIs, as well as each PFIs' ESMS, before first disbursement of IDA financing proceeds from BoU or PSFU to each PFI/ beneficiary, as applicable.</p>	PSFU via PMT and BoU via PMT

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<ul style="list-style-type: none"> 5. Production or trade in alcoholic beverages (excluding beer and wine).¹ 6. Activities targeting tobacco manufacturing, processing, or specialist tobacco distribution, and activities facilitating the use of tobacco.¹ 7. Trade in wildlife or wildlife products regulated under Convention on International Trade in Endangered Species (CITES). 8. Production or trade in radioactive materials. This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where DBE considers the radioactive source to be trivial and/or adequately shielded. 9. Production or trade in or use of unbounded asbestos fibers. 10. Any activities involving significant degradation or conversion of natural² and/or critical habitats³ and/or any activities in legally protected areas.⁴ 		

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<ul style="list-style-type: none"> 11. Activities damaging to national monuments activities that are located in or impacting on areas with physical cultural property⁵ attributes; 12. Unsustainable fishing practices such as electric shocks or explosive materials. 13. Production or trade in wood or other forestry products other than from sustainably managed forests.⁶ 14. Production or trade in pharmaceuticals, pesticides/herbicides, ozone depleting substances, polychlorinated biphenyls (PCBs) subject to international phase outs or bans. 15. Production or activities involving harmful or exploitative forms of forced labor⁷ or harmful child labor⁸. 16. Production, trade, storage, or transport of significant volumes of hazardous chemicals, or commercial scale usage of hazardous chemicals (gasoline, kerosene, other petroleum products, textile dyes etc.). 		

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<p>17. Activities involving land acquisition and/or restrictions on land use resulting in involuntary resettlement or economic displacement.⁹</p> <p>Footnotes</p> <p>1. This does not apply to enterprises that are not substantially involved in these activities. "Not substantially involved" means that the activity concerned is ancillary to an enterprise’s primary operations.</p> <p>2. Natural habitats are land and water areas where (i) the ecosystems' bio-logical communities are formed largely by native plant and animal species, and (ii) human activity has not essentially modified the area’s primary ecological functions. All natural habitats have important biological, social, economic, and existence value. Important natural habitats may occur in tropical humid, dry, and cloud forests; temperate and boreal forests; mediterranean-type shrub lands; natural arid and semi-arid lands; mangrove swamps, coastal marshes, and other wetlands; estuaries; sea grass beds; coral reefs; freshwater lakes and rivers; alpine and sub alpine environments, including herb fields, grasslands, and paramos; and tropical and temperate grasslands. Biodiversity outside of natural habitats (such as within agricultural landscapes) is not covered under this policy. It is good practice to take such biodiversity into consideration in project design and implementation.</p> <p>3. Critical habitat is a subset of both natural and modified habitat that deserves particular attention. Critical habitat</p>		

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<p>includes areas with high biodiversity value that meet the criteria of the World Conservation Union (IUCN) classification, including habitats of significant importance for required for critically endangered or endangered species as defined by the IUCN Red List of Threatened Species; habitats of significant importance for endemic or restricted-range species; habitats supporting globally significant concentrations of migratory species and /or congregatory species; areas with unique assemblages of species or which are associated with key evolutionary processes. Primary Forests or forests of High Conservation Value shall be considered Critical Habitats.</p> <p>5. Also known as ‘cultural heritage’, ‘cultural patrimony’, ‘cultural assets’ or ‘cultural property’. Physical cultural resources are defined as movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other culture I significance. Physical cultural resources may be located in urban or rural settings, and may be above or below ground, or under water. Their cultural interest may be at the local, provincial or national level, or within the international community.</p> <p>6. Sustainable forest management may be demonstrated by the application of industry-specific good practices and available technologies. In some cases, it may be demonstrated by certification/ verification or progress towards certification /verification under a credible standards system. Additionally, the following types of activities involving forests will be excluded: (a) activities that have or may have impacts on the health and quality of forests; (b) activities that affect the rights and welfare of people and their level of dependence upon or interaction with forests; and (c)</p>		

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<p>activities that aim to bring about changes in the management, protection, or utilization of natural forests or plantations, whether they are publicly, privately, or communally owned.</p> <p>7. Forced labor means all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty.</p> <p>8. Employees may only be taken if they are at least 14 years old, as defined in the ILO Minimum Age Convention (C138, Art. 2) ratified by Uganda in 2003. Harmful child labor means the employment of children that is economically exploitive, or is likely to be hazardous to, or to interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.</p> <p>9. Land acquisition and/or restrictions on land use that may result in the physical displacement of people (involuntary resettlement/ relocation or loss of shelter) as well as their economic displacement (as loss of assets or access to assets and/or means of livelihood, regardless of whether or not the affected people must move to another location). This includes the involuntary restriction of access to legally designated parks and protected areas resulting in adverse impacts on the livelihoods of the displaced persons. Land must be acquired on willing-seller willing-buyer basis.</p>		
ESS 2: LABOR AND WORKING CONDITIONS		
<p>2.1 LABOR MANAGEMENT PROCEDURES:</p> <p>The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Association, including</p>		

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<p>through, inter alia, implementing adequate occupational health and safety measures (including emergency preparedness and response measures), setting out grievance arrangements for Project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.</p> <p>In particular:</p> <ul style="list-style-type: none"> (a) BOU and PSFU shall each prepare Labor Management Procedures (LMP) consistent with national legislation and ESS2 that will cover relevant provisions associated with the project (b) BOU and PSFU implement their respective LMPs in a manner acceptable to the World Bank 	<p>Before disbursement of IDA financing proceeds to BoU and PSFU respectively intended for implementing their respective parts of the Project (other than parts 3 and 4 funded through MDTF resources)</p> <p>Ongoing, during implementation after initial disbursement of the IDA financing proceeds respectively to BoU and PSFU</p>	<p>BoU via PMT and PSFU via PMT</p> <p>BoU via PMT and PSFU via PMT</p>

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	<p>(c) Consistent with its respective LMP, BoU will ensure that labor and OHS management measures are: (1) integrated into the E&S screening for financing from the IDA resources under PFIs’ ESMS (as well as the instruments and tools to be required from the PFIs as per the E&S Integration Plan); and (2) implemented by PFIs related to PFI and MSME Project Workers</p> <p>(d) Consistent with its respective LMP, PSFU will ensure that labor and OHS management measures are: (1) integrated into the E&S screening for grant financing from the IDA resources; and (2) implemented by grant recipient Project Workers</p>	<p>Before disbursement of IDA financing proceeds from BoU to corresponding PFI</p> <p>Before disbursement of IDA financing proceeds from PSFU to corresponding grant recipient</p>	<p>BoU via PMT</p> <p>PSFU via PMT</p>
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS:</p> <p>PSFU and BoU shall develop and maintain a grievance redress mechanism (GRM) for labor-related issues and require execution of codes of conduct as part of their respective LMPs</p>	<p>Before disbursement of IDA financing proceeds to BoU and PSFU respectively intended for implementing their respective parts of the Project (other than</p>	<p>BoU via PMT and PSFU via PMT</p>

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		parts 3 and 4 funded through MDTF resources)	
2.3	<p>OHS MEASURES:</p> <p>BoU and PSFU shall include Occupational, Health and Safety (OHS) mitigation measures in their respective ESMFs and LMPs</p>	Before disbursement of IDA financing proceeds to BoU and PSFU respectively intended for implementing their respective parts of the Project (other than parts 3 and 4 funded through MDTF resources)	BoU via PMT and PSFU via PMT
2.4	<p>EMERGENCY PREPAREDNESS AND RESPONSE:</p> <p>BoU and PSFU shall prepare an Emergency Preparedness and Response Plan (EPRP) under their respective ESMFs or LMPs, as feasible and appropriate to the project design and the nature of financing under each project component they will be responsible for implementing, to address potential applicable natural and man-made risks . The plan will include measures for PFIs and their subproject entities/works and PSFU grant recipients.</p>	Before disbursement of IDA financing proceeds to BoU and PSFU respectively intended for implementing their respective parts of the Project (other than parts 3 and 4 funded through MDTF resources)	PSFU via PMT and BoU via PMT

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2.5	PROJECT WORKERS TRAINING: Capacity building on ESS2 issues will be provided to Project Management Teams in PSFU and BoU, as well as PFIs as per the E&S Capacity Building Plan	30 days after effectiveness of the Financing Agreement	PSFU via PMT and BoU via PMT
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	BoU and PSFU will include resource efficiency and pollution prevention and management measures in their respective ESMFs.	Before disbursement of IDA financing proceeds to BoU and PSFU respectively intended for implementing their respective parts of the Project (other than parts 3 and 4 funded through MDTF resources)	PSFU via PMT and BoU via PMT
3.2	Consistent with the ESMF for INVITE Trust, BoU will ensure that resource efficiency and pollution prevention measures are integrated into the E&S screening for financing from the IDA resources under PFIs' ESMS as well as the instruments and	Before disbursement of IDA financing proceeds from BoU to corresponding PFI	BoU via PMT

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	tools to be required from the PFIs as per the E&S Integration Plan		
3.3	Consistent with its respective ESMF, PSFU will ensure that resource efficiency and pollution prevention measures are integrated into the E&S screening for grant financing from the IDA resources and as applicable in grant recipient subproject E&S instruments such as ESIA, ESMP (where applicable)	Before disbursement of IDA financing proceeds from PSFU to corresponding grant recipient	PSFU via PMT
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY: BoU and PSFU will include in the adequate labor force management, HIV/AIDS, community health and safety, COVID-19 and stakeholder engagement measures into their respective ESMFs to ensure that specific community health and safety risks and impacts arising from project activities and project workers are effectively managed.	Before disbursement of IDA financing proceeds to BoU and PSFU respectively intended for implementing their respective parts of the Project (other than parts 3 and 4 funded through MDTF resources)	PSFU via PMT and BoU via PMT

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	If there are any concerns about potential security risks, this section should refer to them being addressed in the ESMF(s) and ESMS(s) of the PFIs where they anticipate funding projects in areas of the country where such risks exist.		
4.2	Consistent with its respective ESMF, BoU will ensure that community health and safety measures are integrated into the E&S screening for financing from the IDA resources under PFIs’ ESMS as well as the instruments and tools to be required from the PFIs as per the E&S Integration Plan	Before disbursement of IDA financing proceeds from BoU to corresponding PFI	BoU via PMT
4.3	Consistent with its respective ESMF, PSFU will ensure community health and safety measures are integrated into the E&S screening for grant financing from the IDA resources and as applicable in grant recipient subproject E&S instruments such as ESIA, ESMP	Before disbursement of IDA financing proceeds from PSFU to corresponding grant recipient	PSFU via PMT
4.4	GBV AND SEA RISKS: (i) PSFU shall conduct GBV/SEA/SH risk assessment and develop a GBV/SEA/SH Action Plan to manage the risks of gender-based violence (GBV),	Before disbursement of IDA financing proceeds to PSFU intended for implementing its respective part of the Project	PSFU via PMT

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<p>sexual exploitation and abuse (SEA) and sexual harassment (SH).</p> <p>(ii) The PMTs shall commit funds to implement measures to address GBV and SEA/SH risks and impacts that may arise during Project implementation.</p> <p>(iii) BOU shall include in the ESMF for INVITE Trust provisions to mitigate GBV/SEA/SH risks as appropriate as well as the instruments and tools to be required from the PFIs as per the E&S Integration Plan</p>	<p>(other than parts 3 and 4 funded through MDTF resources)</p> <p>After initial disbursement of the IDA financing proceeds to BoU and PSFU respectively</p> <p>Before disbursement of IDA financing proceeds to BoU intended for implementing its respective part of the Project (other than parts 3 and 4 funded through MDTF resources)</p>	<p>PSFU via PMT and BoU via PMT</p> <p>BoU via PMT</p>

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ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT		
<p>5.1 LAND ACQUISITION AND RESETTLEMENT: The PSFU shall prepare a Resettlement Policy Framework (RPF) that shall guide the assessment of the expected land acquisition and involuntary resettlement (this can be stand-alone or incorporated into the ESMF)</p>	<p>Before disbursement of IDA financing proceeds to PSFU intended for implementing its respective part of the Project (other than parts 3 and 4 funded through MDTF resources)</p>	<p>PSFU via PMT</p>
<p>5.2 Consistent with its respective ESMF, BoU shall ensure that project finance sponsors prepare and disclose all relevant instruments (RAPs, ARAPs, etc.) for factories/ structures/ facilities and other infrastructure financed under component 2 in line with relevant national laws and WB ESSs</p>	<p>Ongoing, during implementation after initial disbursement of the IDA financing proceeds to BoU</p>	<p>BoU via PMT</p>
<p>5.3 RESETTLEMENT PLANS: If the need for the development of a RAP arises, the BoU and PSFU PMTs will ensure that RAPs consistent with the requirements of RPF and ESS5 and, relevant to national laws, are prepared and implemented by those entities responsible for undertaking involuntary resettlement activities.</p>	<p>Prior to initiating activities that involve involuntary resettlement</p>	<p>PSFU and BoU via PMTs</p>

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	BoU will ensure that project finance sponsors prepare and disclose all relevant instruments (RAPs, ARAPs, etc.) for factories/ structures/ facilities and other infrastructure financed under component 2 in line with relevant national laws and WB ESSs	Prior to initiating activities that involve involuntary resettlement	BoU via PMT	
5.4	MONITORING AND REPORTING: The PMTs will provide quarterly RAP progress reports in line with ESCP compliance reporting .	Ongoing, during implementation after the IDA financing agreement for the Project (“Financing Agreement”) becomes effective	PSFU and BoU via PMTs	
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES				
6.1	BIODIVERSITY RISKS AND IMPACTS: BoU and PSFU will include in their respective ESMFs measures and actions to assess and manage risks and impacts on biodiversity conservation and sustainable management of living natural resources. Any activities that would involve impacts on critical habitats will not be financed (as per the List of Excluded Activities).	Before disbursement of IDA financing proceeds to BoU and PSFU respectively intended for implementing their respective parts of the Project (other than parts 3 and 4 funded through MDTF resources.		

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	Timeframe	Responsibility / Authority and Resources/Funding Committed	
6.2	Consistent with the ESMF for INVITE Trust, BoU will ensure that measures and actions to assess and manage risks and impacts on biodiversity conservation and sustainable management of living natural resources are integrated into the E&S screening for financing from the IDA resources under PFIs' ESMS as well as the instruments and tools to be required from the PFIs as per the E&S Integration Plan	Before disbursement of IDA financing proceeds from BoU to corresponding PFI	BoU via PMT
6.3	Consistent with its respective ESMF, PSFU will ensure that measures and actions to assess and manage risks and impacts on biodiversity conservation and sustainable management of living natural resources are integrated into the E&S screening for grant financing from the IDA resources and as applicable in grant recipient subproject ES instruments such as ESIA, ESMP	Before disbursement of IDA financing proceeds from PSFU to corresponding grant recipient	PSFU via PMT
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	VULNERABLE AND MARGINALIZED GROUPS PRESENT OR COLLECTIVELY ATTACHED TO PROJECT AREA: PSFU: Under the ESMF include a Vulnerable and Marginalized Groups Framework for factories/ structures/ facilities and other infrastructure that	Before disbursement of IDA financing proceeds to PSFU intended for implementing its	PSFU via PMT

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<p>might impact vulnerable and marginalized groups financed under component 2 in line with relevant national laws and WB ESS7.</p> <p>BoU to include aspects related to impacts on vulnerable and marginalized groups into the ESMF for INVITE Trust and ensure that measures and actions are integrated into the E&S screening for financing from the IDA resources under PFIs’ ESMS (as well as the instruments and tools to be required from the PFIs as per the E&S Integration Plan)</p> <p>The project will exclude activities that would require FPIC – i.e. that would (i) have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation; (ii) cause relocation (or have caused relocation) of IP; or (iii) have significant impacts on IP cultural heritage that is material to their identity</p> <p>GRIEVANCE MECHANISM: BOU and PSFU will ensure that the established grievance management committees are culturally</p>	<p>respective part of the Project (other than parts 3 and 4 funded through MDTF resources)</p> <p>Before disbursement of IDA financing proceeds to BoU intended for implementing its respective part of the Project (other than parts 3 and 4 funded through MDTF resources) ensuring integration of these measures and action in PFI ESMS before disbursement of IDA financing proceeds from BoU to corresponding PFI</p>	<p>BoU via PMT</p>

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	appropriate and accessible to members of the vulnerable and marginalized groups.		Prior to initiating activities that affect vulnerable and Marginalized groups		PSFU and BoU via PMTs
ESS 8: CULTURAL HERITAGE					
8.1.	<p>CHANCE FINDS: BOU and PSFU will assess and manage impacts and risks on cultural heritage and, if applicable, incorporate requirements for chance finds procedures in their respective ESMFs</p> <p>BoU will include these considerations in the PFI's instruments and tools as appropriate with the support of Ministry of Tourism, Wildlife and Antiquities and the Department of Culture and Family Affairs at the Ministry of Gender Labor and Social Development</p>		Before disbursement of IDA financing proceeds to BoU and PSFU respectively intended for implementing their respective parts of the Project (other than parts 3 and 4 funded through MDTF resources)		PSFU and BoU via PMTs
ESS 9: FINANCIAL INTERMEDIARIES					
9.1.	<p>Consistent with the ESMF for INVITE Trust, BoU will ensure that each PFI has an ESMS that will have at a minimum the following:</p> <p>(i) Contain E&S policies and procedures adequate for assessment, monitoring, and reporting of E&S</p>		Before disbursement of IDA financing proceeds from BoU to corresponding PFI		BoU via PMT

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<p>risks specific to the financial products that will be used under the INVITE Trust; this must contain the E&S List of Excluded Activities as incorporated in the financing agreement between BoU and the PFI (including all footnotes)</p> <p>(ii) Designate E&S staff responsible for ESMS implementation, as well as adequate resources</p> <p>(iii) Adopt the applicable portions of the E&S Integration Plan prepared by BoU into their lending processes for business lines funded from INVITE Trust</p> <p>(iv) Commit to conducting regular internal E&S training of investment staff working on business lines funded from INVITE Trust</p> <p>(v) Have ESMS be approved by PFI senior management</p> <p>(vi) Disclose a summary of ESMS on the PFI’s website</p>		

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9.2	<p>Prepare, consult upon, publicly disclose and implement an E&S Capacity Building Plan to include, at a minimum:</p> <ul style="list-style-type: none"> (i) Assessment of capacity and resources for E&S management by PFIs (once identified) (ii) Awareness training on E&S requirements and tools under the project for PFIs including ESMS (iii) One-on-one support to PFIs on implementation of the required tools including the ESMS and tools developed pursuant the E&S Integration Plan 	<p>Prepare, consult upon, publicly disclose before disbursement of IDA financing proceeds to BoU intended for implementing its respective part of the Project (other than parts 3 and 4 funded through MDTF resources); and thereafter implement the plan in accordance with the timeline set forth in the plan.</p>	BoU via PMT
9.3	<p>Consistent with the ESMF for INVITE Trust, BoU will incorporate appropriate E&S risk management clauses in all legal agreements with between BOU and PFIs to ensure that PFIs adopt and implement the E&S tools (including environmental and social clauses in legal agreements) and specific assessment instruments, as appropriate, as per the E&S Integration Plan and develop and/ or strengthen their ESMS, as appropriate.</p>	<p>Before disbursement of IDA financing proceeds from BoU to corresponding PFI</p>	BoU via PMT

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9.4	<p>BoU will conduct quarterly monitoring and reporting on compliance of PFIs with E&S requirements and also provide annual E&S reports to the World Bank including the results of E&S Annual Audit.</p> <p>Such reporting will be made possible by mandating that PFIs do routine monitoring of their subprojects, and subsequent reporting to BOU to allow for adequate data/information on the activities financed by the PFIs from the proceeds of the INVITE Trust.</p>	<p>Quarterly/ annually, during implementation after initial disbursement of the IDA financing proceeds to BoU</p>	<p>BoU via PMT</p>

ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

10.1	<p>SEP PREPARATION: PSFU shall prepare, consult upon, adopt and publicly disclose a Stakeholder Engagement Plan (SEP) cover relevant provisions associated with the project components managed by PSFU, as well as refer to BOU’s existing / updated policies and procedures on information dissemination, as appropriate’ SEP shall include responsibilities of the PFIs</p>	<p>Before first disbursement of IDA funds to PSFU</p>	<p>PSFU via PMT</p>
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10.2	<p>PROJECT GRIEVANCE MECHANISM: The project GRM will be developed as part of the relevant environmental and social risk management instruments to be prepared prior to implementation of the project e.g. the ESMF, VMGP, RPF, etc.</p>	After initial disbursement of the IDA financing proceeds to BoU and PSFU respectively	PSFU and BOU via PMTs	
Capacity Support				
Specify Training to be provided		Specify Targeted Groups and Timeframe for Delivery	Specify Training Completed	
<p>In case of BoU, training and capacity building to be provided, as well as targeted groups and timeframes, as specified as part of the E&S Capacity Building Plan</p> <p>PSFU will also incorporate a capacity building section in its ESMF</p>		<p>In accordance with the time frame indicated in the E&S capacity building plan</p> <p>In accordance with the timeframe for PSFU ESMF preparation</p>	<p>BoU via PMT</p> <p>PSFU via PMT</p>	