

The Government of Montenegro

Ministry of Agriculture, Forestry and Water Management

Ministry of Ecology, Sustainable Development and Northern Region Development

Montenegro Water Security and Climate Adaptation Project (P512709)

(Phase 1 of the Multi-Phase Programmatic Approach

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Negotiated

October 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Montenegro (the Borrower) will implement the Montenegro Water Security and Climate Adaptation Project (the Project), via National project implementation unit in the field of communal services and environment (PROCON) as the Project Implementation Unit (PIU)and Ministry of Finance ("TSU") with the involvement of the Ministry of Ecology, Sustainable Development and Northern Region Development, and the Ministry of Agriculture, Forestry and Water Management of Montenegro, as set out in the Loan Agreement. The International Bank for Reconstruction and Development (the Bank) has agreed to provide financing for the Project, as set out in Agreement.

2. The Borrower shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.

3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Bank. Said E&S documents may be revised from time to time with prior written agreement by the Bank. As provided for under the referred Agreement, the Borrower shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.

4. As agreed by the Bank and the Borrower, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Bank and the Borrower agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and Minister of the Ministry of Ecology, Sustainable Development and Northern Region Development. The Borrower shall promptly disclose the updated ESCP.

5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	**ORGANIZATIONAL STRUCTURE** Establish and maintain a Project Implementation Unit (PIU) with qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project including one Environmental specialist and one Social specialist. An OHS specialist may be engaged whenever civil works are ongoing, and the PIU shall mobilize additional OHS capacity if the Bank determines that the scale or risk profile of the works, or contractor OHS performance, so requires. For activities under advance procurement, ensure that the relevant E&S instruments are adopted and disclosed prior to launching the respective procurement processes, and in any case before the commencement of the relevant Project activities.	Establish a PIU via National project implementation unit in the field of communal services and environment (PROCON) and hire or appoint one environmental specialist and one social specialist no later than three months after the Effective Date of the Loan Agreement ("Effective Date") and thereafter maintain the PIU and these positions throughout Project implementation.	Ministry of Ecology, Sustainable Development and Northern Region Development Ministry of Agriculture, Forestry and Water Management
B	**CAPACITY BUILDING PLAN/MEASURES** Prepare and implement the following capacity building measures: Training for selected municipalities, on ESF and specific aspects of environmental and social assessment, e.g. E&S screening, E&S risks, , social risk management, land acquisition/access restriction, ecosystem services resettlement planning, stakeholder engagement, community health and safety, code of conduct and grievance handling.	30 days after the PIU is established.	PIU (PROCON) in cooperation with the World Bank
MONITORING AND REPORTING			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
C	**REGULAR REPORTING** Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include: • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism, the grievance log, and progress made in resolving them. • E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports. • Number and status of resolution of incidents and accidents reported under action E below.	Submit quarterly reports to the World Bank during implementation of the Activities, commencing after the Effective Date. Submit each report to the World Bank no later than 30 days after the end of each reporting period.	PIU (PROCON) Ministry of Ecology, Sustainable Development and Northern Region Development Ministry of Agriculture, Forestry and Water Management
D	**CONTRACTORS' MONTHLY REPORTS** Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Bank.	Submit the monthly reports to the Bank on request as annexes to the reports to be submitted under action C above.	PIU (PROCON)
E	**INCIDENTS AND ACCIDENTS** Notify the Bank of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Bank upon request.	Notify the Bank no later than 48 hours after learning of the incident or accident through Contractor's /Supervision's/Inspection's report or notice. Provide available details upon request.	PIU (PROCON)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.	Provide review report and Corrective Action Plan to the Bank no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.	
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	**ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS** a) Implement an Environmental and Social Management Framework (ESMF) Resettlement Policy Framework (RPF), Labour Management Procedures (LMP) and Stakeholder Engagement Plan (SEP) for the Project, consistent with the relevant ESSs. b) Prepare, disclose, and implement site-specific Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs), Resettlement Action Plans (RAPs) and Livelihood Restoration Plans (LRPs) consistent with the ESMF and the relevant ESSs, proportionate to the nature and scale of the risks and impacts. c) Conduct independent E&S audit of existing facility under Sub-Component 2.1 and implement the recommended actions into preliminary ESMP for D&B Contractor d) Revise, update and finalize preliminary ESMP for activities under Sub-Component 2.1. of the Project once detailed design is available.	(a) ESMF, SEP, LMP and RPF prepared, disclosed and publicly consulted by appraisal and implemented throughout Project implementation. (b) Prior to preparation of bidding documents (c) Prior to commencing the bidding process for D&B Contractor (d) Prior to the commencement of any build works, once detailed designs are available, to ensure that all mitigation measures reflect the final site layout and construction methodology. RAP and LRP must be implemented prior to taking possession of the land.	Ministry of Ecology, Sustainable Development and Northern Region Development, Ministry of Agriculture, Forestry and Water Management Montenegro in cooperation with PIU (PROCON) Municipal administration in cooperation with the PIU and responsible authorities c) Regional Water Utility d) PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		(e) (f) Site-specific instruments - such as ESIA, ESMPs, ESMP checklists, Resettlement Action Plans (RAPs), site specific SEPs, and Livelihood Restoration Plans (LRPs) — to be prepared, publicly disclosed, consulted upon and incorporated as part of the bidding documents for the respective subproject prior to carrying out any site-specific investment activities and civil works. Implement the respective ESMP and (when applicable) RAPs, throughout Project implementation.	
1.2	**MANAGEMENT OF CONTRACTORS** • Incorporate the relevant aspects of the ESCP, including the relevant E&S instruments, Labor Management Procedures, and code of conduct, into the ESHS specifications of procurement documents and contracts with contractors and supervising firms. Thereafter ensure that contractors and supervising firms comply, and cause subcontractors to comply, with the ESHS specifications of their respective contracts. • Require contractors to prepare a site-specific C-ESMP prior to commencement of rehabilitation works, and to assign dedicated ESHS focal points as key personnel at the site throughout the life of their contract.	As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation.	PIU (PROCON) and contractor

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	• Require all contractors, subcontractors, and their workers to sign and comply with a Code of Conduct, including provisions on SEA/SH prevention. Include non-compliance remedies for E&S violations in all contracts and subcontracts. • Monitor contractor compliance throughout project implementation, including through monthly ESHS performance reports submitted to the Ministry of Ecology. Engage independent supervision services for E&S compliance, as needed. • Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Bank.		
1.3	**TECHNICAL ASSISTANCE** Carry out consultancies, studies (including feasibility studies, as applicable), institutional strengthening activities, development of technical documentation, capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Bank, consistent with the Environmental and Social Standards (ESSs). Thereafter prepare and finalize the outputs of such activities, including technical documentation and institutional strengthening deliverables, in compliance with the terms of reference.	Throughout Project implementation.	PIU (PROCON)and contractor

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.5	**ASSOCIATED FACILITIES** In case Associated Facilities are identified, ensure that the activities in each identified Associated Facility are carried out in accordance with the applicable requirements of this ESCP and the ESSs, including, inter alia, the ESMF, ESIA, ESMP, LMP, provisions related to management of contractors under paragraph 1.2 above, RPF, and SEP, as applies.	Prepare the ESIA/ESMP checklists, for Associated Facility prior to carrying out any site-specific investment activities and civil works and incorporate the ESMP, SEP, RPF (when land acquisition is required) as part of the respective bidding documents for the respective subproject prior to carrying out any site-specific investment activities and civil works that requires the preparation of such ESMP. Once finalized, implement the respective ESMP , SEP, and (when applicable) RAP, throughout Project implementation.	PIU (PROCON)
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	**LABOR MANAGEMENT PROCEDURES** Implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, OHS (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.	Implement and enforce the LMP throughout Project implementation, and update it as necessary to reflect changes in project activities, workforce composition, or applicable legal requirements.	PIU (PROCON)
2.2	**OCCUPATIONAL HEALTH AND SAFETY MEASURES** a. Develop OHS measures to assess and manage the OHS risks and impacts of the Project as part of ESIA/ESMP and	a. Same timeline as ESIA/ESMP preparation and implementation under 1.1.	PIU (PROCON)/ Responsible Ministries and Contactor

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	b. Require contractors/ subcontractors to adopt and include the measures in their respective C-ESMP	b. prior to commencement of works for each contract. Implement and enforce OHS measures throughout Project implementation.	
2.3	**CODE OF CONDUCT** Ensure that all Project workers, including workers engaged by contractors, subcontractors, and supervising firms, sign a Code of Conduct (CoC) as a condition of engagement. The CoC shall, at a minimum: (a) set out expected standards of professional conduct and behavior, including in interactions with local communities, project-affected parties, and fellow workers; (b) prohibit all forms of SEA and SH, with clear definitions and examples; (c) prohibit all forms of child labor and forced labor; (d) prohibit discrimination, harassment, and intimidation; (e) set out the consequences of violations, including disciplinary action, termination of employment, and, where applicable, referral to law enforcement; and (f) include a commitment to report violations through the worker grievance mechanism or to supervisors without fear of retaliation. All Project workers shall receive induction training on the CoC, delivered in a language and format they can understand, prior to commencing work. Evidence of CoC signing and training shall be maintained by PIU and made available to the Bank upon request.	CoC to be developed as part of the LMP and signed by all Contractors prior to commencement of work, and thereafter implemented throughout Project implementation	PIU (PROCON)/ Responsible Ministries and Contactor
2.4	**GRIEVANCE MECHANISM FOR PROJECT WORKERS** Establish, publicize, maintain, and operate a grievance mechanism for all Project workers, as described in the LMP and consistent with ESS2. The worker grievance mechanism shall be communicated to all Project workers at the time of their engagement, including through worker induction training. Contractors and subcontractors shall be required to establish and maintain their own worker grievance mechanisms consistent with the LMP, or to ensure their workers have access to the project-level mechanism.	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	PIU (PROCON)/ Responsible Ministries and Contractors
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3.1	**WASTE MANAGEMENT PLAN** Where relevant, prepare and implement a Waste Management Plan (WMP), as part of the site-specific ESIA/ESMP, to manage hazardous and non-hazardous wastes, consistent with ESS3.	Same timeline as ESIA/ESMP preparation and implementation under 1.1.	PIU (PROCON)
3.2	**RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT** Incorporate resource efficiency and pollution prevention and management measures in the ESIA/ESMP to be prepared under action 1.1. above, where and if relevant in line with the provisions of the ESMF.	Same timeline as ESMP preparation and implementation under 1.1.	PIU (PROCON)
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	**TRAFFIC AND ROAD SAFETY** Incorporate measures to manage traffic and road safety risks as required in the ESIA/ ESMP to be prepared under action 1.1 above. Prepare and implement Traffic Management Plans (TMP) for all civil works activities that may affect road users, pedestrians, and surrounding communities -- including pipeline installation along road corridors, excavation and trenching across or adjacent to public roads, haulage of materials and equipment, and construction of water infrastructure in peri-urban and urban areas	Same timeframe as for the preparation and implementation of the ESIA/ESMP. TMPs to be prepared by contractors, approved by supervision engineer and PIU, and operational prior to commencement of works for relevant Project activity. Implement and enforce throughout the construction phase.	PIU (PROCON)
4.2	**COMMUNITY HEALTH AND SAFETY** Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, risks of labor influx, and include mitigation measures in the ESMPs/ESIA to be prepared in accordance with the ESMF.	Same timeframe as for the preparation and implementation of the ESIA/ESMPs.	PIU (PROCON)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.3	**SEA AND SH RISKS** Implement SEA/SH prevention and mitigation measures as required in the ESMPs and LMP, including codes of conduct, training, SEA/SH referral mechanisms. Under Part 1, cause the contractors to incorporate such measures in their respective ESIA/ESMPs under action 1.1 above.	Implement SEA/SH prevention and mitigation measures prior to mobilization of project workers and thereafter implement such measures throughout Project implementation.	PIU (PROCON)
4.4	**SECURITY MANAGEMENT** Security personnel are not envisioned, but that if this changes, the borrower will assess risks and prepare an Security Management Plan consistent with ESS4.	Prior to engaging security personnel and thereafter maintained throughout implementation.	PIU (PROCON)
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	**RESETTLEMENT FRAMEWORK** Implement a Resettlement Policy Framework (RPF) consistent with ESS5, to guide the identification, assessment, and mitigation of land acquisition and involuntary resettlement risks and impacts under the Project. Establish and implement a systematic screening process, consistent with the RPF, for all project activities to determine whether they will result in land acquisition, temporarily or permanent restrictions on land use, physical displacement, or economic displacement. The screening process shall be applied to all subprojects and activities prior to site confirmation and prior to commencement of any works. Screening results shall be documented and shall determine the appropriate resettlement instrument required (RAP, ARAP, or Process Framework), if any.	Implement the RPF throughout Project implementation. Apply screening for each subcomponent or activity prior to site confirmation and prior to commencement of works	PIU (PROCON)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
5.2	**RESETTLEMENT ACTION PLANS (RAPs)** For each project activity (or set of activities) that will result in physical and/or economic displacement -- including but not limited to the construction of water treatment plants, reservoirs, pump stations, pipelines, transmission mains, distribution networks, and ancillary infrastructure -- prepare site-specific Resettlement Action Plans (RAPs) or Livelihood Restoration Plans (LRPs), proportionate to the scale, nature, and severity of the resettlement impacts, consistent with ESS5 and the RPF. Each RAP/LRP shall include: (a) a census of PAPs and an inventory of affected assets; (b) the applicable entitlements matrix; (c) a livelihood restoration plan for economically displaced persons whose income sources or means of livelihood are affected; (d) a schedule for implementation, including timing of compensation payments and, where applicable, relocation assistance; (e) a consultation and participation plan; (f) a monitoring plan, including post-resettlement evaluation; and (g) a budget and financing arrangements. Each RAP/LRP shall be submitted to the World Bank for review and clearance prior to commencement of the works it covers. No physical or economic displacement, land acquisition, or demolition of structures shall occur until the applicable RAP/LRP has been finalized, approved by the World Bank, and compensation and resettlement assistance fully paid to PAPs	Prepare site-specific RAPs/ LRPs as engineering designs are finalized for each subproject, and implemented prior to taking possession of the land	PIU (PROCON)
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	**BIODIVERSITY RISKS AND IMPACTS** Where and if relevant and identified through the processes laid out in the ESMF, prepare and implement a Biodiversity Management Plan (BMP) as part of the ESIA/ESMP, in accordance with the guidelines of the Project ESMF, and consistent with the requirements of ESS6.	Same timeline as ESIA/ESMP preparation and implementation under 1.1.	PIU (PROCON)
ESS 8: CULTURAL HERITAGE			
8.1	**CHANCE FINDS** Describe and implement the chance finds procedures in ESIA/ESMP of the sub-projects.	Same timeframe as for the preparation and implementation of the ESIA/ESMPs.	PIU (PROCON)
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.1	**STAKEHOLDER ENGAGEMENT PLAN** Implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia: (a) identify relevant stakeholders, including project-affected parties and other interested parties, with particular attention to those who may be disadvantaged or vulnerable due to their specific circumstances; (b) provide stakeholders with timely, relevant, understandable and accessible information about the environmental and social risks and impacts of the Project, including information related to water supply disruptions, construction activities, service changes, tariff adjustments, or any other matters that may affect communities; (c) consult stakeholders in a culturally appropriate manner that is free of manipulation, interference, coercion, discrimination and intimidation; (d) document and report on stakeholder engagement activities throughout Project implementation, including: (i) stakeholder identification and/or mapping; (ii) information disclosed; (iii) description of consultations and participation mechanisms utilized and records of meetings held; (iv) feedback received and responses provided; and (v) measures to engage stakeholders who, because of their particular circumstances, may be disadvantaged or vulnerable; and (e) utilize differentiated and accessible engagement methods (e.g., community meetings, public notice boards, radio broadcasts, printed materials in local languages, and digital platforms) to ensure broad participation, including by women, low-income households, and other marginalized groups that may be disproportionately affected by changes to water services. The SEP shall apply at the Project level, and each sub-project shall incorporate the relevant SEP requirements into its respective site-specific ESMP.	The SEP shall be updated at least annually / as needed based on emerging project circumstances and re-disclosed throughout Project implementation.	PIU (PROCON)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.2	**INFORMATION DISCLOSURE** Ensure that information about project activities and project-related environmental and social instruments (including this ESCP, the SEP, Environmental and Social Management Plans (ESMPs), Resettlement Action Plans (RAPs), and other relevant documents) are disclosed to the public in a timely manner, in local language(s), and in a format and location accessible to project-affected parties and other interested parties. Disclosure channels shall include, but not be limited to, [the Borrower's official website, project site offices, local government offices, community notice boards, and/or other platforms relevant to the project context].	Disclose all relevant project information and environmental and social instruments prior to appraisal and thereafter promptly upon finalization or revision throughout Project implementation	PIU (PROCON)
10.3	**PROJECT GRIEVANCE MECHANISM** Establish, publicize, maintain, and operate an accessible grievance mechanism (GM) to receive and facilitate the resolution of concerns and grievances in relation to the Project — promptly, effectively, and in a transparent manner that is culturally appropriate and readily accessible to all project-affected parties, at no cost to the complainant and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The GM should be operational at the site level from the commencement of construction, with clear referral pathways to the project-level GM and, where relevant, to government complaint systems. The grievance mechanism shall: a. be operational and widely publicized through community-level outreach, including in local languages, before commencement of any project activities; b. include multiple accessible intake channels (e.g., in-person complaint desks at project sites and local offices, telephone hotlines, written submissions, and where applicable, digital channels); c. ensure that acknowledgment of receipt and resolution of grievances occur within defined timelines, and that complainants are informed of outcomes; d. maintain a grievance register documenting all complaints received, actions taken, and resolutions reached; e. include provisions for escalation of unresolved grievances to higher levels, including the World Bank's Grievance Redress Service (GRS);	Establish the grievance mechanism no later than one month following the Effective Date and thereafter maintain and operate the mechanism throughout Project implementation.	PIU (PROCON)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	f. be equipped to receive, register, and facilitate the resolution of Sexual Exploitation and Abuse / Sexual Harassment (SEA/SH) complaints, including through the referral of survivors to relevant gender-based violence (GBV) service providers, in a safe, confidential, and survivor-centered manner; and g. be reviewed and updated periodically to ensure continued effectiveness and accessibility throughout Project implementation.		
10.4	**SEP REPORTING:** Include a summary of stakeholder engagement activities, information disclosed, consultations held, grievances received and resolved, and feedback incorporated into Project decisions in the regular environmental and social progress reports submitted to the Bank.	As part of semi-annual environmental and social progress reports throughout Project implementation.	PIU (PROCON)
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness: 1. Establishment of the Project Implementation Unit (PIU) with adequate E&S personnel (A above) 2. Recruitment and training of E&S and OHS staff within PIU (B above) 3. E&S assessments and plans to be prepared by the Borrower, through PIU prior to tendering of the works (1.1 above)			