Government of Belize

The Ministry of Agriculture, Food Security and Enterprises Climate Resilient and Sustainable Agriculture Project - P172592

Draft

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

October 22, 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

- 1. The Government of Belize (hereafter, the **Borrower**), through the Ministry of Agriculture, Food Security and Enterprise (MAFSE), will implement the Climate Resilient and Sustainable Agriculture Project (CRESAP) (hereafter, the **Project**). The International Bank for Reconstruction and Development (hereinafter, the **Bank**) has agreed to provide financing for the Project.
- 2. The Borrower shall carry out the Project in accordance with the Environmental and Social Standards (ESSs). To this end, 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 Borrower shall also comply with the provisions of any other Environmental and Social (E&S) documents required under the Environmental and Social Framework (ESF) and referred to in this ESCP, such as the Environmental and Social Management Framework (ESMF), Resettlement Policy Framework (RPF), Social Assessment (SA), Stakeholder Engagement Plan (SEP), Labour Management Procedures (LMPs), Indigenous Peoples Planning Framework (IPPF), site specific Environmental and Social Impact Assessments and Management Plans (ESIAs/ESMPs), Resettlement Action Plans (RAPs), Indigenous Peoples Plans (IPPs), and the timelines specified in those E&S documents.
- 4. The Borrower shall be responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.
- 5. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Bank by the Borrower 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, in coordination with the MAFSE, shall agree to the changes with the Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Bank and the Borrower through the Chief Executive Officer, MAFSE. The Borrower shall promptly disclose the updated ESCP.
- 7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Borrower shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include risks related to water management, occupational and community health and safety, land acquisition, voluntary land donation, social exclusion and other environmental and social impacts.

MATE	RIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBILE ENTITY/AUTHORITY
MONI	TORING AND REPORTING		
A	REGULAR REPORTING Prepare and submit to the Bank consolidated regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project for activities implemented by both contractors and Financial Intermediaries (FIs). Regular reporting includes but is not limited to the status of preparation and implementation of environmental and social documents required under the ESCP, status and performance of subprojects, stakeholder engagement activities, and functioning of the Grievance Mechanisms (GMs). For activities implemented by FIs, MAFSE shall ensure that each FI submits quarterly reports to MAFSE to be consolidated as part of the regular Project	Quarterly consolidated Project Reports shall be sent to the Bank not later than forty-five (45) days after the end of each quarter, starting from the Project Effective Date. Midterm and completion reports shall also be submitted, as required by the Bank, during Project implementation.	MAFSE
В	reporting. MAFSE shall suggest environmental and social templates that FIs may uniformly adopt to ensure streamlined consolidation of reporting. Contractors for any civil works implemented by MAFSE shall provide monthly monitoring and compliance reports to MAFSE. INCIDENTS AND ACCIDENTS		
	Promptly notify the Bank of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the communities, workers, or the public. Provide sufficient detail 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 or supervising entity, as appropriate. Subsequently, as per the Bank's request, prepare a report on the incident or accident and propose measures to prevent its recurrence.	The Bank shall be notified within forty-eight (48) hours after learning of the incident or accident. A subsequent report shall be provided within a timeframe acceptable to the Bank, as requested.	MAFSE
	ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND	IMPACTS	
1.1	 ORGANIZATIONAL STRUCTURE a. A project implementation unit (PIU) shall be established and maintained under MAFSE, which will include, inter alia, one (1) qualified environmental and social focal point, with qualifications and experience satisfactory to the Bank, and thereafter maintained throughout Project implementation. In addition, MAFSE shall hire one (1) part-time environmental consultant and 	a. MAFSE has designated one of its staff members as the environmental and social focal point for the Project and hired the services of part-time consultants to help prepare	MAFSE

	 one (1) part-time social consultant with the option to convert them to full-time depending on the project needs. b. Adequate resources shall be allocated to support management of environmental, social, health and safety risks of the Project including the implementation of the Stakeholder Engagement Plan and the Project Grievance Mechanism, ESF training to contractors, Financial Intermediaries, 	environmental and social documents. The focal point and organizational structure shall function throughout the Project period. b. Resources shall be maintained throughout the Project period.	
1.2	 PIU staff, and MAFSE's staff. ENVIRONMENTAL AND SOCIAL ASSESSMENT AND MANAGEMENT PLANS a. Prepare, disclose, consult, and adopt the Environmental and Social Management Framework (ESMF) covering all the components /subcomponents of the Project in a manner acceptable to the Bank. Screen and assess the potential environmental and social risks and impact of the proposed subproject activities, in accordance with the ESMF. b. Prepare, consult, and disclose the Social Assessment (SA) in a manner acceptable to the Bank and adhering to the Terms of Reference. Incorporate the findings and actions in the subproject design, review, and implementation. c. Conduct environmental and social screening and assessment for all subprojects following the process detailed in the Project ESMF. Subsequently prepare, disclose, adopt, and implement subproject specific Environmental and Social Management Plans (ESMPs) based on the findings of the screening and assessment. The ESMPs shall include following plans based on the findings of the screening or assessment: Waste Management Plan Pollution Management Plan Integrated Pest Management Plan 	 a. ESMF was prepared, disclosed, and consulted before the Project Appraisal. The final version shall be in place no later than on the Effective date of the Project. Implement throughout the Project Period. b. As soon as possible but no later than ninety (90) days of the Effective date of the Project. Implement throughout the Project period. c. Plans or instruments shall be prepared, disclosed, consulted, and adopted before subproject approval and carried out throughout Project implementation as outlined in the ESMF. No activities that may cause material environmental and social risks and impacts shall be initiated before the finalization of ESMPs. 	MAFSE
	 Stormwater Sedimentation and Erosion Control Plan Community Health and Safety Plan Biodiversity Management Plan Emergency Preparedness and Response Plan Traffic and Road Safety Management Plan 		

	Security Plan		
	 d. Ensure that the environmental and social risks, impacts, and mitigation measures identified in the ESMF are incorporated into the Project Operational Manual. 	d. Before finalization of the Project Operational Manual, based on an acceptable timeline with the Bank.	
1.3	MANAGEMENT OF CONTRACTORS		
	 Develop and implement procedures for managing contractors and subcontractors for subcomponent 2.1, including, inter alia, by: Ensuring that the findings detailed in the ESMPs mentioned in action 1.2 above and in the Labour Management Procedures are incorporated into the bidding documents. Ensuring that relevant requirements on environmental and social management are included in contracts and subcontracts (reflecting ESSs and ESCP). Requiring the preparation of a Contractor ESMP that is costed, with required resources to mitigate environmental and social risks. Monitoring contractor commitments and compliance. Ensuring a separate Grievance Mechanism for workers. Ensuring contractors provide details on contractor's oversight on ESHS performance. Ensuring contractors prepare monthly reports on ESHS performance. 	Environmental and social actions shall be included in bidding documents prior to initiating the bidding process. Maintain procedures and supervise consultants and contractors throughout the Project period.	MAFSE
1.4	CONTINGENT EMERGENCY RESPONSE (CER)		
1.7	a. Ensure that the CER Manual incorporates the environmental and social management arrangements and requirements detailed in the ESMF, in a manner consistent with the ESSs, including the preparation of any required environmental and social instruments for the activities to be conducted under the Contingent Emergency Response Component of the Project (Component 4).	The adoption of environmental and social aspects in the CER Manual is a requirement under the Financing Agreement for the Project	MAFSE, and any other agency assigned to implement the CER activities
	b. Prepare, adopt, and disclose all the environmental and social instruments that may be required for CER activities of the Project in accordance with the process outlined in the ESMF, the CER Manual, and the ESSs, and thereafter implement the measures and actions required under said instruments, within the timeframes specified in said instruments.	b. The environmental and social instruments shall be submitted for the Bank's review and approval, and thereafter adopted before the carrying out of any CER activity that requires the preparation of these instruments. Once adopted, these instruments will be	

		implemented in accordance with their terms, in a manner acceptable to the Bank.	
1.5	TECHNICAL ASSISTANCE Technical Assistance terms of reference, plans, studies, training material, and reports shall incorporate environmental and social requirements and shall be reviewed by the PIU, and subsequently submitted for the Bank's review and approval.	Prior to the commencement of any Technical Assistance activity. Implement throughout the duration of the activity.	MAFSE
1.6	 ACTIVITIES INELIGIBLE FOR FINANCING Ensure that the types of activities listed below, and detailed in the ESMF, are not financed under the Project: Any activity where no environmental and social screening was done. Any activity that may cause significant adverse environmental and social risks; long term, permanent and/or irreversible adverse impacts; and/or may give rise to significant social conflict. Any activity that may pose risks to natural habitats, critical habitats, ecologically sensitive areas, legally protected and/or internationally recognized areas of high biodiversity value. Any activity that may have a high probability of causing serious adverse effects to human health and/or the environment not related to COVID-19 treatment. Any activity involving the purchase of pesticides and insecticides. Any activity that would cause damage or destruction of tangible and intangible cultural heritage 	Ineligible activities shall be identified and excluded from financing during the assessment process conducted under action 1.2. above.	MAFSE
ESS 2:	LABOR AND WORKING CONDITIONS		
2.1	a. The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Bank. To this end, MAFSE shall prepare, disclose, consult, and adopt Labour Management Procedures (LMP) incorporating the relevant requirements of ESS2.	a. The LMP was prepared, disclosed, and consulted upon before the Project appraisal. The final version shall be in place no later than on the Effective date of the Project. The LMP shall be implemented throughout the Project period.	MAFSE

	b. Prepare and adopt a Code of Conduct for Project workers as part of LMP, that shall also apply to any security personnel involved in the Project as indicated in action 4.4 below. The code of conduct shall include guidelines for all project workers to ensure that ESS2 requirements are met, including measures to prevent and respond to sexual exploitation and abuse (SEA), and sexual harassment (SH), as part of the LMP.	b. Same timeframe as above.	
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain, and operate a GM for Project workers, as described in the LMP and consistent with ESS2. MAFSE shall monitor implementation of the GM of other implementing agencies including Contractors and FIs.	The GM has been established and shall be operational as soon as possible but no later than thirty (30) days of the Effective date of the Project and maintained throughout the Project period.	MAFSE
2.3	OCCUPATIONAL HEALTH AND SAFETY MEASURES Prepare, adopt, and implement occupational, health and safety measures described in the ESMF and in action 4.1 below, including any emergency preparedness and response measures to be developed as part of the subproject ESMPs.	Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.	MAFSE
ESS 3:	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT		
3.1	WASTE MANAGEMENT PLAN Prepare, adopt, and implement subproject Waste Management Plans, where applicable, to manage agricultural, hazardous, and non-hazardous waste as part of the ESMPs to be prepared under action 1.2 above and as described in the ESMF.	Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.	MAFSE
3.2	POLLUTION MANAGEMENT PLAN Prepare, adopt, and implement subproject Pollution Management Plans, where applicable, to manage air, soil, water, and noise pollution as part of the ESMPs to be prepared under action 1.2 above and as described in the ESMF.	Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.	MAFSE
3.3	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Prepare, adopt, and implement subproject resource efficiency and pollution prevention and management measures as set out in the ESMF, including a Stormwater, Sediment, and Erosion Control Plans to mitigate stormwater	Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.	MAFSE

3.4	INTEGRATED PEST MANAGEMENT PLAN Prepare, adopt, and implement subproject Integrated Pest Management Plans, where applicable, to ensure that farm operations integrate ecologically sound strategies for the use, storage, and disposal of pesticides but these plans will not include the purchase of pesticides. Include these measures as part of the ESMPs to be prepared under action 1.2 above and as described in the ESMF.	Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.	MAFSE
ESS 4:	COMMUNITY HEALTH AND SAFETY		
4.1	COMMUNITY HEALTH AND SAFETY Prepare, adopt, and implement subproject Community Health and Safety Plans, where applicable, with measures and action to manage specific risks and impacts to the community arising from Project activities, including in relation to behaviour of Project workers and any risks of labour influx, and include these measures in the ESMPs to be developed under action 1.2 above and as described in the ESMF.	Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.	MAFSE
4.2	EMERGENCY MANAGEMENT Prepare, adopt, and implement emergency preparedness and response measures through Emergency Preparedness and Response Plans, where applicable, as part of the ESMPs to be prepared under action 1.2 above and as described in the ESMF.	Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.	MAFSE
4.3	TRAFFIC AND ROAD SAFETY Prepare, adopt, and implement subproject Traffic and Road Safety Management Plans, where applicable, to be prepared under action 1.2 above and as described in the ESMF.	Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.	MAFSE
4.4	SECURITY MANAGEMENT Prepare, adopt, and implement subproject Security Plans, where applicable, as part of the ESMPs to be prepared under action 1.2 above and as described in the ESMF.	Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.	MAFSE
4.5	GBV AND SEA RISKS DURING PROJECT IMPLEMENTATION Project workers including PIU, contractors and subcontractors shall be required to sign the Project code of conduct which stipulates clear prohibitions against any form of discrimination including GBV and SEA as detailed in the LMP.	Before the commencement of relevant subprojects. Implement throughout the Project period.	MAFSE
	LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLE		
5.1	RESETTLEMENT POLICY FRAMEWORK	a. RPF was prepared, disclosed, and	

	 a. Prepare, disclose, consult, adopt, and implement a Resettlement Policy Framework (RPF), acceptable to the Bank. b. Include a Voluntary Land Donation (VLD) protocol to the RPF, in a manner acceptable to the Bank. 	consulted before the Project Appraisal. The final version shall be in place no later than on the Effective date of the Project. Implement throughout the Project Period. b. Prior to project appraisal and thereafter included in the Project Operations Manual before it is finalized.	MAFSE
5.2	RESETTLEMENT PLANS Prepare, disclose, consult, adopt, and implement resettlement action plans (RAPs) in accordance with ESS5 and consistent with the requirements of the Resettlement Policy Framework (RPF) that has been prepared for the Project, and thereafter adopt and implement the respective RAPs before carrying out the associated activities. RAPs shall cover voluntary land donation, land acquisition, resettlement, and/or livelihood impacts, in a manner acceptable to the Bank.	RAPs shall be submitted to the Bank for approval and implemented, including compensation of Project Affected Persons (PAPs), prior to commencing associated subprojects. Implement RAPs throughout the Project period.	MAFSE
5.3	GRIEVANCE MECHANISM Ensure that the project-level GM described in the SEP shall cover grievances for individuals, households or businesses affected by land acquisition, voluntary land donation or any restrictions on land use.	Same timeframe as for the preparation and operationalization of the project-level GM in the SEP, under action 10.2.	MAFSE
5.4	MONITORING AND REPORTING Provide regular monitoring and reporting on land acquisition and resettlement activities as part of the overall Project reporting.	To be prepared and submitted to the Bank as part of the regular Project reporting requirements under action A.	MAFSE
ESS 6:	BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NA	TURAL RESOURCES	
6.1	Ensure that subprojects with limited scope shall include screening of biodiversity risks, while activities with a wider scope shall include site-specific biodiversity assessments. Where applicable, biodiversity baselines shall be determined following the process outlined in the ESMF. Prepare, adopt, and implement subproject biodiversity management plans (BMPs), where applicable, as part of the ESMPs in accordance with the ESMF under action 1.2 above.	Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.	MAFSE

ESS 7:	INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TR	ADITIONAL LOCAL COMMUNITIES	
7.1	INDIGENOUS PEOPLES PLANNING FRAMEWORK Prepare, disclose, consult, adopt and implement Indigenous Peoples Planning Framework (IPPF) in accordance with ESS7.	IPPF was prepared, disclosed, and consulted on before the Project Appraisal. The final version shall be in place no later than on the Effective date of the Project. Implement throughout the Project period.	MAFSE
7.2	INDIGENOUS PEOPLES PLAN Prepare, consult, disclose, adopt, and implement Indigenous Peoples Plans (IPPs) consistent with the requirements of the Indigenous Peoples Planning Framework (IPPF) that has been prepared for the Project and ESS7, in a manner acceptable to the Bank.	IPP shall be prepared, disclosed, and consulted before the commencement of relevant subprojects. Implement throughout Project period.	MAFSE
7.3	GRIEVANCE MECHANISM The project level GM described in the SEP shall cover grievances of indigenous people in accordance with ESS7.	Same timeframe as for the preparation and operationalization of the project-level GM in the SEP, under action 10.2.	MAFSE
7.4	MONITORING AND REPORTING Ensure that monitoring and reporting on IPPs are conducted separately or as part of regular reporting for subprojects that require the preparation of an IPP.	To be prepared and submitted to the Bank as part of the regular Project reporting requirements under action A.	MAFSE
ESS 8:	CULTURAL HERITAGE		
8.1	CHANCE FINDS Prepare, disclose, consult, adopt, and implement a chance finds procedure as described in the ESMF. Works contracts will include a standard chance finds clause consistent with the ESMF.	Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.	MAFSE
ESS 9:	FINANCIAL INTERMEDIARIES		
9.1	ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS) a. FIs without an existing ESMS shall prepare, disclose, adopt, and maintain an ESMS, acceptable to the Bank, to manage impacts associated with subprojects to be financed by the Bank.	a. FIs without an ESMS to prepare and adopt the ESMS prior to making their first disbursement to FI subprojects as defined in ESS9. FIs to maintain and operate the ESMSs throughout the Project period. This condition shall be included in the Matching Grant Operational Manual.	MAFSE, FIS
	b. FIs with an existing ESMS shall review and update ESMSs, acceptable to the	b. FIs with an ESMS to update the ESMS	

	Bank, to manage impacts associated with subprojects to be financed by the Bank. c. MAFSE shall prepare an ESMS guideline, following the developed Terms of Reference, to guide FIs in developing their own ESMSs. d. Summaries of the ESMSs shall be disclosed through the FIs websites, if they exist, and on MAFSE's and the Bank's websites.	prior to making their first disbursement to FI subprojects. FIs to maintain and operate the ESMSs throughout the Project period. This condition shall be included in the Matching Grant Operational Manual. c. MAFSE to develop the ESMS guideline as soon as possible but no later than ninety (90) days of the Effective date of the Project. d. Prior to FIs making their first disbursement to FI subprojects.	
9.2	FI ORGANIZATIONAL CAPACITY Each FI shall establish and maintain an organizational capacity and competency for implementing the ESMS with clearly defined roles and responsibilities.	Before the FI makes its first disbursement to FI subprojects. Maintain throughout the Project period.	MAFSE, FIS
9.3	SENIOR MANAGEMENT REPRESENTATIVE Each FI shall designate a senior management representative to have overall accountability for environmental and social performance of FI subprojects.	Before the FI makes its first disbursement to FI subprojects. Maintain throughout the Project period.	MAFSE, FIS
9.4	REPORTING BY FINANCIAL INTERMEDIARIES Each FI to submit reports to MAFSE on environmental, social, health and safety performance of subprojects, including on the implementation of the ESMS and the environmental and social status and performance of FI subprojects.	Prepare and submit quarterly reports to MAFSE, as described in action A above, following the first disbursement of Project funds to beneficiaries and continued throughout Project implementation.	MAFSE, FIS
9.5	HUMAN RESOURCES MANAGEMENT Each FI shall prepare and adopt relevant aspects of ESS2, including written labor management procedures (LMP), including a GM to raise and address workplace concerns, occupational health and safety aspects, terms of employment and non-discrimination and equal opportunity.	Before the FI makes its first disbursement to FI subprojects. Maintain throughout the Project period.	MAFSE, FIS
ESS 10	: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE		
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION Prepare, disclose, consult, adopt, and implement a Stakeholder Engagement Plan (SEP) to identify stakeholders and outline effective strategies of collaboration among stakeholders of the Project, in accordance with the	SEP was prepared, disclosed, and consulted before the Project Appraisal. The final version shall be in place no later than on the Effective date of the Project. Implement	MAFSE

	requirements of ESS10. In the context of Covid-19, consultations will follow Belize Country Guidelines as well as the World Bank Guidelines. Update and redisclose the SEP based on the results of the Social Assessment and other updates to the SEP.	throughout the Project period.	
10.2	PROJECT GRIEVANCE MECHANISM Prepare, adopt, maintain, and operate a project GM, as described in the SEP, which shall also cover the grievances related to land acquisition and livelihood impacts. It will also be culturally specific and cover concerns of indigenous People as well.	The GM has been established and shall be operational as soon as possible but no later than thirty (30) days of the Effective date of the Project and maintained throughout the Project period.	MAFSE
10.3	MONITORING AND REPORTING Ensure implementation, monitoring, and reporting on the Project GM	Monitoring reports shall be prepared and submitted to the Bank as part of the regular Project reporting requirements under action A above.	MAFSE
CAPA	CITY SUPPORT (TRAINING)		
CS1	The following capacity development and training activities, acceptable to the Bank, shall be carried out to enhance the capacity of MAFSE PIU to address environmental and social risks. Adequate resources shall be allocated from the Project to implement the capacity building training, as detailed in the ESMF budget. • PIU staff on Bank Environmental and Social Standards. • Training to PIU on preparation/implementation of ESF instruments (SEP, ESCP, ESMF, RPF, LMP, IPPF, etc.). • Grievance Mechanism, including a database for MAFSE. • Conducting community awareness meetings during Covid-19 • Emergency Response Planning for projects for the MAFSE.	Training plan to be developed no later than ninety (90) days after the effective date of the Project. Implement the training plan throughout the Project period.	MAFSE
CS2	Training shall be provided to Project workers on occupational health and safety, including measures to be taken during Covid-19, Emergency preparedness and response, Code of Conduct, and on relevant aspects of environment and social compliance (i.e., ESMF, LMP, RPF, GM, GBV etc.).	Prior to implementation of Project activities and continued on a routine basis throughout the Project period based on an agreed-upon training plan.	MAFSE

CS3	Capacity development and training activities shall be carried out to enhance the capacity of the FIs to address environmental and social risks as per the developed ESMS	Prior to the FIs making their first disbursements to FI subprojects and continued throughout the Project period.	MAFSE
CS4	Prepare and deliver technical and awareness trainings on safe environmental and social practices to farmers.	Ongoing throughout the Project period.	MAFSE