Republic of Kenya

State Department for Roads, Kenya National Highways Authority, Kenya Rural Roads Authority, National Transport and Safety Authority, National Construction Authority, and ICT Authority

Roads for Rural Economic Development Project (P517267)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Appraisal Version

October 2026

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ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Kenya (the Recipient) will implement the Roads for Rural Economic Development Project (the Project), with the involvement of the Kenya National Highways Agency (KeNHA), National Construction Authority (NCA), ICT Authority (ICTA), State Department for Roads (SDoR), Kenya Rural Roads Authority (KeRRA) and Kenya Revenue Authority (KRA), as set out in the Project Financing Agreement (the Agreement). The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the Agreement. This ESCP shall apply to applicable activities under the financing for the Project referred to above.

2. The Recipient 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 Association. 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 Recipient 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 Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided under the referred Agreement, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.

4. As agreed by the Association and the Recipient, 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 Recipient through the Project Coordinator of the Project Management Office, under the SDoR, and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient. The Recipient 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.

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	**ORGANIZATIONAL STRUCTURE** a. KeNHA shall establish and maintain a Project Implementation Team (PIT), building on the Project Preparation Team (PPT), with qualified staff and resources to support management of environmental, social, social, health and safety (E&S) risks and impacts of the Project. The PIT shall include one Social Specialist, one Environmental Specialist, one Occupational health and safety (OHS) specialist, one Gender Based Violence specialist, and one stakeholder engagement specialist. b. KeRRA, KRA and NCA shall each recruit one Environmental specialist and one Social specialist to be part of their PITs. c. KeNHA and KeRRA shall enter into contract agreement with a Consortium of Civil Society Organizations (CSOs) to manage construction phase social risks and impacts of RREDP including management of SEA/SH risks, community consultations and stakeholders' engagement. d. All implementing agencies shall require contractors and supervision consultants, each to have on a full-time basis, suitably qualified staff and resources to support implementation and oversight of the C-ESMPs including one Social Specialist; one Occupational Safety and Health Specialist; and one Environmental Specialist. Additionally, KeNHA shall require each road contractor to have, at minimum, three (3) community liaison officers (CLOs) to cover their areas of operations, confirm adequacy and scale CLO staffing relative to active work fronts and social context. e. KeNHA shall collaborate with Lead Government Agencies (LGA) to manage environmental and social risks and impacts associated with the Project. This collaboration will include facilitating the key LGAs as they carry out the following: ▪ The National Environment Management Authority (NEMA) will carry out periodic compliance inspections of Project activities, and report on key environmental performance and incidents through its established environmental reporting and incident-management mechanisms. ▪ The National Land Commission (NLC) to oversee compulsory acquisition and compensation, confirm the legality of Project land acquisition, and report through its established mechanisms for public land management and acquisition. ▪ The Directorate of Occupational Safety and Health Services (DOSHS) to conduct semi-annual independent occupational health and safety surveillance at all road construction sites and submit the surveillance report to the Association. ▪ The Kenya Forest Service (KFS) to monitor Project activities in gazetted forest reserves, including restoration measures, and report on implementation through its annual statutory and incident-based reports.	a. Establish the PIT prior to Project effective date and thereafter maintain the PIT and these positions throughout Project implementation. b. No later than 90 days after Project effective date and maintain the positions throughout the Project c. Enter into contract with CSOs prior to commencement of construction activities. d. During the tendering process but onboarding no later than 30 days after contract signing. e. Not later than six (6) months after commencement of road construction works and thereafter, biannually throughout the Project.	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	▪ The Water Resources Authority (WRA) to inspect Project water use and discharges and report on water-related compliance through its annual regulatory and audit reports, with ad-hoc reporting on significant non-compliance or pollution incidents. ▪ The Kenya Wildlife Service (KWS) to monitor wildlife habitats, corridors and protected areas intersecting with Project activities, update wildlife mitigation measures as needed, and coordinate responses to significant wildlife incidents. ▪ The National Museums of Kenya (NMK) to oversee chance-find procedures and advise on managing heritage finds or impacts, including long-term conservation measures, reporting through annual operations reports and immediate notifications when incidents or heritage finds occur.		
B	**CAPACITY BUILDING PLAN/MEASURES** Prepare and implement the following capacity building measures: • Training for all PIT staff, Project workers and Contractors on stakeholder identification, mapping and engagement, grievance redress mechanism, specific aspects of environmental and social assessment, emergency preparedness and response, community health and safety, and biodiversity management.	Provide capacity building before commencement of any civil works on the two road corridors and thereafter refresher trainings, at least every quarter, throughout the Project.	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.
MONITORING AND REPORTING			
C	**REGULAR REPORTING** Each implementing agency through KeNHA shall prepare and submit to the Association regular quarterly 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 and consultation activities, including community health and safety sensitizations, carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the Project's grievance mechanism(s), the grievance log, and progress made in resolving them. • Status of implementation of the resettlement plans (RPs) and livelihood restoration activities • E&S performance of contractors and subcontractors as reported through quarterly contractors' and supervision firms' reports. • Status of resolution of incidents and accidents reported under action E below. • Implementation status of contractors' ESMPs • Status of implementation of the vulnerable and marginalized Groups plan (VMGP) • Statutory improvement orders, if any, and status of their implementation.	Submit quarterly reports to the Association following Project effectiveness date and throughout Project implementation Submit each report to the Association no later than 30 days after the end of each reporting period. Submit Lead Government Agencies' reports within two weeks of the date requested by the Bank.	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.

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	Submission of environmental and social monitoring reports by Lead Government Agencies (NEMA, NLC, WRA, KWS, KFS and NMK) to the Association will also be required on a needs-driven basis in response to significant non-compliance, material pollution incidents or unprecedented heritage or environmental finds.		
D	**CONTRACTORS' MONTHLY REPORTS** Require contractors and supervising firms to provide joint 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 Association.	Submit the monthly progress reports to the Association upon request.	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.
E	**INCIDENTS AND ACCIDENTS** Notify the Association 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; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse or sexual harassment (SEA/SH); or disease outbreaks. In the case of SEA/SH, incident reports shall be limited to basic facts, ensure that survivor information is anonymized, kept confidential, and referrals to appropriate GBV services. Provide available details of the incident or accident to the Association upon request. Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, 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.	Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request. Provide detailed review and investigation report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, or as agreed in writing with the Association based on incident complexity.	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	**ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS** 1. KeNHA shall prepare, disclose and implement the final Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs. 2. KeNHA shall prepare, consult, disclose and implement Environmental and Social Impact Assessments (ESIAs) for RREDP subprojects, consistent with relevant ESSs. 3. Each implementing agency shall require contractors to prepare Construction Environmental and Social Impact Assessment (C-ESMP) for each road corridor and the supervision consultant to review and approve the C-ESMP prior to contractor's mobilization to site and supervise implementation.	1. Prepare and disclose the final ESMF by Project effective date and thereafter implement throughout Project. 2. Prior to commencing civil works and thereafter implement the ESIAs throughout Project.	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	4. Each implementing agency shall require appointed contractors to prepare Environmental and Social Impact Assessments (ESIAs) or Environmental and Social Management Plans (ESMPs) for auxiliary facilities, as set out in the ESMF, and thereafter implement the respective ESMPs throughout the Project. 6. Prepare, consult, disclose and implement ESIAs for all subprojects under the Project before the commencement of civil work.	3. Incorporate the requirements for C-ESMP in the bidding documents, approve C-ESMP before contractor mobilization and monitor implementation throughout the Project. 4. Incorporate the requirements of ESIAs/ESMPs for auxiliary facilities in the bidding documents for the respective subprojects. Once finalized, implement the respective ESMP throughout Project implementation. 6. Prepare the ESIAs prior to commencement of civil works and incorporate the ESMP as part of the respective bidding documents for the respective subprojects prior to the carrying out of the subprojects that require the preparation of such ESMP. Once finalized, implement the respective ESMP throughout Project implementation.	
1.2	**MANAGEMENT OF CONTRACTORS** Incorporate the relevant aspects of the ESCP, including, inter alia, ESIA, ESMP, the Labor Management Procedures (LMP), Stakeholders Engagement Plan (SEP) and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter, ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association.	As part of the preparation of procurement documents and respective contracts and supervise contractors throughout Project implementation. Submit copies of relevant contracts provided to the Association upon request.	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.
1.3	**TECHNICAL ASSISTANCE** All implementing agencies shall carry out consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter, prepare and finalize the outputs of such activities in compliance with the terms of reference.	Throughout the Project.	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	**LABOR MANAGEMENT PROCEDURES** Prepare, disclose and adopt Labor Management Procedures (LMP) for the Project, including the codes of conducts (CoC) that sets out SEA/SH prevention measures, safeguards for survivors' protection, and protocols for confidential information management and follow-up. Require contractors to implement gender-responsive recruitment measures and report workforce participation disaggregated by sex and age.	Prepare LMP prior to Project effective date and thereafter implement throughout the Project.	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.
2.2	**OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN** Require contractors and consulting firms, through contractual obligations, to prepare and implement OHS Management Measures in accordance with the ESMF, ESIA and ESMPs and General and other relevant World Bank Group (WBG) EHS Guidelines. Contractors prepare, implement, and maintain OHS measures as part of the C-ESMP; and the Supervision Consultant review and approve C-ESMP and supervise implementation.	Prior to commencement of any civil works and thereafter implement throughout Project implementation.	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.
2.3	**GRIEVANCE MECHANISM FOR PROJECT WORKERS** Establish and operate a functional grievance mechanism for all Project workers, as described in the LMP and consistent with ESS2. Require contractors and consultants, through contractual obligations, to adopt the Project grievance mechanism for all their workers of the Project.	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	**WASTE MANAGEMENT PLAN** Required contractors to prepare and implement a Waste Management Plan (WMP), as part of the C-ESMP prepared for the Project, to manage hazardous and non-hazardous waste, consistent with ESS3. Contractors prepare, implement, and maintain WMP as part of the C-ESMP; and the Supervision Consultant review and approve C-ESMP and supervise implementation. All implementing agencies ensure contractual incorporation of WMP obligations and supervise implementation.	Same as 1.1	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.
3.2	**RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT** Incorporate resource efficiency and pollution prevention and management measures in the ESMF, ESIAs and the C-ESMP to be prepared under action 1.1 above.	Same as 1.1	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.
ESS 4: COMMUNITY HEALTH AND SAFETY			

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4.1	**TRAFFIC AND ROAD SAFETY** Require contractors to develop and implement traffic and road safety management plan as part of the Contractor's ESMP to be prepared under action 1.1 above.	Same as 1.1	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.
4.2	**COMMUNITY HEALTH AND SAFETY** a. KeNHA, ICTA, KRA and NCA shall assess specific risks and impacts to the community arising from Project activities and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF, and require contractors to prepare and implement Community Health and Safety Plan, consolidating all actions to manage risks and impacts related to road traffic safety, transportation of materials and equipment, and management of waste and hazardous materials in line with ESSs, WBG General and Toll Road EHS Guidelines. The plan will also include measures to minimize the risk of social conflict and GBV and prevent the spread of communicable diseases due to potential Project induced labor- influx. b. KeNHA shall require contractors, supervision consultants and road safety consultants to undertake periodic awareness creation among communities along the Project corridor on various community health and safety issues and planned prevention measures, including on emergency response drills. c. KeNHA shall prepare and adopt operation-phase community health and safety management plan for the Project road corridors, including pedestrian safety, roadside settlements and schools, community exposure to dust/noise, hazardous materials spills, lighting at crossings/bus stops, behavior of road maintenance contractors, and emergency response measures, consistent with the relevant ESSs and WBG General and Toll Road ESHS Guidelines, and ensure the same are implemented by appointed road maintenance contractors. d. Prepare and implement Food Safety and Logistics Hub Operational Management Measures, including cold-storage safety, food hygiene, refrigeration management, worker safety, waste management and emergency preparedness.	a. Same as 1.1 b. As part of the preparation of procurement documents and respective contracts and supervise implementation throughout the Project. c. Prior to commissioning the roads and implement and maintain throughout road operation phase. c. Prior to commissioning the logistic hubs and implement and maintain throughout their operation phase.	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.
4.3	**SEA AND SH RISKS** Prepare and implement an SEA/SH Action Plan to assess and manage the risks of SEA and SH, including survivor-centered GRM.	Prepare the SEA/SH Action Plan prior to Project effective date and thereafter implement throughout Project.	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.
4.4	**SECURITY MANAGEMENT**	1. Prior to deploying project workers/assets and implement throughout the Project	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.

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	1. If the Project deploys security personnel, all implementing agencies shall implement measures to manage the risks of engaging security personnel to safeguard project workers, sites, assets, and activities as set out in the Project's ESIAs and C-ESMP. 2. Implement standards, protocols, and/or codes of conduct for the selection and assignment of armed personnels to the Project, including to verify that assigned individuals have not engaged in past unlawful or abusive behavior, including sexual exploitation and abuse (SEA), sexual harassment (SH) or excessive use of force, in line with ESSs. 3. Provide adequate instruction and training to the security personnel, prior to deployment and on a regular basis, on the use of force and appropriate conduct (including in relation to civilian-military engagement, SEA/SH, and other relevant areas), as set out in the Security Management Plan, MoU and sub-project specific C-ESMPs. 4. Ensure that the stakeholder engagement activities under the Stakeholder Engagement Plan (SEP) include communication on the involvement of the security personnel in the Project. 5. Ensure that any concerns or grievances regarding the conduct of security personnel are received, monitored, and documented (taking into account the need to protect confidentiality) by the Project's grievance mechanism, which shall facilitate its resolution, in accordance with ESS4 and ESS10. Notify the Association after receiving the concern or grievance, as set out under action E above.	2. Prior to deployment of Security Personnel and on a regular basis throughout the project implementation 3. Prior to deployment of security personnel and on a regular basis throughout the project implementation 4. During the preparation of SEP 5. Throughout project implementation	
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	**RESETTLEMENT FRAMEWORK AND PLANS** 1. Prepare, disclose and implement a Resettlement Framework (RF) for the Project to include ESF requirements, consistent with ESS5. 2. Prepare, disclose and implement Resettlement Plans (RPs) for RREDP, consistent with ESS5 before acquiring land and commencing civil work. Ensure Project affected people are provided with full compensation at replacement cost and any other assistance, in accordance with the RAPs and ESS5. 3. Prepare and implement a Livelihood Restoration Plan (LRP) for Project affected households who are significantly impacted by each activity under the Project where LRP is required, as set out in the RF and consistent with ESS5.	1. Prepare and disclose the RF by Project effective date and thereafter implement the RF throughout the Project. 2. Prepare, disclose and implement the RPs prior to commencing any civil works in the road corridors. 3. Prepare, disclose and implement the respective LRP prior to carrying out the relevant works, including ensuring that before taking possession of the land and related assets, full compensation has been provided.	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	**BIODIVERSITY RISKS AND IMPACTS** All implementing agencies shall ensure that ESIAs for their respective subprojects under the Project are undertaken, consistent with ESS6. Siting of auxiliary facilities and logistical hubs in forested areas shall be avoided. As part of ESIA for the South Rift Gateway Corridor, KeNHA shall undertake detailed biodiversity assessment for sections of the road intersecting Mau forest and prepare a biodiversity Management Plan, in line with ESS6.	Same as 1.1 above	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	**INDIGENOUS PEOPLES PLAN** Prepare, disclose and implement Vulnerable and Marginalized Group Plan (VMGP) for all Project activities along the RREDP, in line with ESS7 requirements. Implement a Free, Prior and Informed Consent (FPIC) as addendum to VMGP for project activities that will involve adverse impacts including impacts on their traditionally owned, used, or occupied lands and territories, natural resources, or access to such resources. ICTA shall ensure that digital connectivity investments are planned and implemented in an inclusive manner that maximizes the inclusion and tailored benefits of vulnerable and marginalized groups.	Prepare and disclose the VMGP within six months of project effective date and implement throughout the Project. Implement and document the FPIC procedure before acquiring the land for project activities involving adverse impacts to VMGs.	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.
ESS 8: CULTURAL HERITAGE			
8.1	**CHANCE FINDS** Adopt and implement a chance find procedures in ESMF, as part of the C-ESMP of the subprojects under the Project.	Same as 1.1 above and implement throughout Project.	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.
8.2	**TANGIBLE CULTURAL HERITAGE OF VMGs/SSAHUTLCs** Identify, in consultation with the affected communities, tangible cultural heritage of significance to such communities that may be affected by the Project, including archaeological sites and material, graves and burial sites, sacred or culturally significant sites, and natural features and landscapes of cultural significance. Avoid adverse impacts on such cultural heritage wherever feasible, including through appropriate consideration of the Right of Way alignment and siting of ancillary and other project-supported facilities. Where impacts cannot be avoided, develop and implement appropriate	Prior to commencement of works in areas where communities meeting the criteria of ESS7 are present. Where the circumstances specified in ESS7 requiring Free, Prior and Informed Consent (FPIC) are applicable, obtain and document FPIC before carrying out the activities giving rise to such impacts.	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.

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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	mitigation measures consistent with ESS7 and ESS8, through meaningful consultation with the affected communities.		
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	**ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)** Not applicable		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	**STAKEHOLDER ENGAGEMENT PLAN** Prepare, disclose, and implement SEP for the Project, consistent with ESS10 and ESS7, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	Prepare and disclose the SEP prior to appraisal and thereafter update, as necessary, implement the SEP throughout the Project.	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.
10.2	**PROJECT GRIEVANCE MECHANISM** Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.	Establish Project-level GM and publicize it in the project areas prior to commencing civil works and thereafter maintain and operate the mechanism throughout Project implementation.	KeNHA, KeRRA, ICTA, NCA, KRA and SDoR.
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness (to be met prior to first disbursement for civil works): 1. All PITs are fully staffed with qualified E&S specialists acceptable to the Association (Section A). 2. Final ESMF and RF consulted upon, disclosed, and adopted (Section 1.1 and 5.1). 3. SEA/SH Action Plan, including survivor-centered GRM adopted (Section 4.3). 4. LMP prepared and workers' GM established (Section 2.1–2.3). 5. SEP consulted upon, adopted and disclosed (Section 10.1). 6. Vulnerable and Marginalized Group Plan (VMGP) prepared and disclosed (Section 7.1) 7. Project-level GM established, staffed, and publicly announced in project areas (Section 10.2).			