

Public Disclosure Authorized

The Republic of Uzbekistan
Ministry of Natural Resources
Forestry Agency

RESILAND CA+ Program: Uzbekistan Resilient
Landscapes Restoration Project

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Environmental and Social
Commitment Plan

May 6, 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Uzbekistan (hereinafter the Recipient) shall implement the RESILAND CA+ Program: Uzbekistan Resilient Landscapes Restoration Project (hereinafter the Project), with the involvement of the Forestry Agency under the Ministry of Natural Resources (FA). The International Development Association (hereinafter the Association) has agreed to provide financing for the Project.
2. The Recipient shall 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 material measures and actions, to be carried out or caused to be carried out by the Recipient, including the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, grievance management and the environmental and social assessments and instruments to be prepared or updated, disclosed, consulted, adopted and implemented under the ESCP and the ESSs, all in a manner acceptable to the Association.
3. Notwithstanding any other provision in this ESCP, the Recipient is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by FA or another ministry or another implementing agency, contractor, or any other entity or unit for the Project.
4. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Association by the Recipient as required by the ESCP, and the conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
5. As agreed by Association and the Recipient, through the FA, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Recipient, through the FA, shall agree to the changes with the Association and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through an exchange of letters signed between the Association and the FA. The FA shall promptly disclose the updated ESCP.
6. Where Project changes, unforeseen circumstances, or Project performance result in changes to the environmental or social risks and impacts during Project implementation, the Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

Material Measures and Actions		Timeframe	Responsible Entity/Authority
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING. Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to, the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement plan, and the grievance mechanism. In addition, prepare and submit to the Association a mid-term report (MTR) and a project completion report.</p>	<p>Monitoring reports: Every six months starting from project Effective Date, throughout Project implementation. MTR: by midterm of the Project implementation. Project completion report: 60 days prior to project Closing Date.</p>	FA Project Implementation Unit (PIU) team
B	<p>INCIDENTS AND ACCIDENTS. Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury and road accidents. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence within an agreed timeframe. Include in bidding documents of contractors that prompt notification of accidents and incidents remain inclusive under the contractor’s Environmental and Social Management Plan (ESMP). Other incidents and accidents not subject to immediate notification and reporting in accordance with this provision shall be included in the regular Project reports pursuant to action A of this ESCP.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>A detailed report of the incident would be provided within fifteen (15) days, unless a different timeframe is agreed with the Association.</p> <p>Within the preparation of bidding documentation.</p>	FA PIU team
C	<p>CONTRACTORS QUARTERLY REPORTS. Require contractors, subcontractors and supervising firms to provide quarterly monitoring reports on ESHS performance including, on subproject Environmental and Social Impact Assessment (ESIA) / Environmental and Social Management Plan (ESMP), LMP and SEP implementation in accordance with the metrics specified in the respective bidding documents and contracts, and submit such reports to the to the PIU/</p>	<p>Submit the quarterly reports to the Association as annexes to the reports to be submitted under action A above.</p>	FA PIU team, contractors, subcontractors and supervising firms

Material Measures and Actions		Timeframe	Responsible Entity/Authority
	and/or Supervision Consultants (if they exist). Such reports shall be filed and submitted to the Association.		
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE:</p> <p>a. Maintain throughout Project implementation effective staffing and institutional structures to support the management of the Project E&S risks and impacts. FA shall maintain one Environmental Specialist with experience in Occupational Health and Safety (OHS), one Social Risk Management Specialist, and one Gender Specialist with strong experience on gender-based violence (GBV) as part of the PIU team, all with terms of reference, experience and qualifications acceptable to the Association. The PIU shall further engage GBV service providers, and train selected local officers and community members in areas where GBV services are absent.</p> <p>b. Mobilize additional staff on short-term or long-term assignment as necessary to manage the E&S risks of the Project in accordance with the ESSs and ESMF institutional assessment/needs, including subject matter specialists on biodiversity, forestry management, environmental and social impact assessment, GBV including sexual exploitation and abuse and sexual harassment (SEA/SH), labor conditions (including prevention of child and/or forced labor, health & safety), land tenure, and social inclusion, all with terms of reference, experience and qualifications acceptable to the Association.</p>	<p>a. Recruit environmental and social risk management staff (one Environmental Specialist, one Social Risk Management Specialist, and one Gender Specialist) as part of PIU within 30 days after Project Effective Date and maintain throughout Project implementation.</p> <p>b. As needed starting 90 days after Project Effective Date and maintained throughout Project implementation.</p>	FA PIU team
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT:</p> <p>a. Conduct scoping of key environmental and social risks and impacts of the Project and identify appropriate mitigation measures as further described in 1.3 and 5.2 in accordance with the Environmental and Social Management Framework (ESMF), Process Framework & Resettlement Policy Framework (PF&RPF) and the ESSs, in a manner acceptable to the Association.</p> <p>b. Screen any proposed Project activities in accordance with the ESMF prepared for the Project, and, thereafter, draft, disclose, consult upon, adopt, and implement the subproject ESIA/ ESMP, and any other instruments as the ESMF requires, consistent with ESSs, for the respective Project activities, in a manner acceptable to the Association. All activities that may lead to high E&S risks shall be excluded from the Project and ineligible for Project financing, in particular all activities that might involve in involuntary</p>	<p>a. Draft ESMF acceptable to the Association has been prepared, consulted on, adopted and disclosed locally prior to Project Appraisal completion. Final ESMF has been redisclosed prior to Project Negotiations. The ESMF shall be implemented throughout Project implementation.</p> <p>b. Screening and E&S instruments to be adopted prior to commencement of relevant Project activities. Thereafter, E&S instruments to be complied with</p>	FA PIU team

	Material Measures and Actions	Timeframe	Responsible Entity/Authority
	<p>land acquisition (i.e. physical displacement) as detailed in Section 1.4 below and the exclusion list in the ESMF.</p> <p>c. The site-specific documents shall be disclosed to stakeholders, including local communities, consistent with ESS10 and in accordance with the Stakeholder Engagement Plan.</p>	<p>and implemented throughout Project implementation.</p> <p>c. Before commencement of relevant Project activities, throughout Project implementation.</p>	
1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS: Finalize, consult on, redisclose, adopt, and implement the ESMF prepared for the Project, satisfactory to the Association, to screen and manage the environmental and social risks and impacts of the Project in accordance with the ESSs. The ESMF should outline the guiding principles of environmental and social screening, assessment, review, management, and monitoring procedures for all envisaged activities. The ESMF shall be disclosed in country in both English and the local language(s) on the FA website and external website of the Association.</p>	<p>ESMF finalized, consulted upon, adopted and redisclosed prior to Project Negotiations. Thereafter, implement ESMF throughout Project implementation.</p> <p>Subproject ESIAs/ESMPs and any other instruments to be adopted and disclosed prior to commencement of Project activities and implemented throughout Project implementation.</p>	FA PIU team
1.4	<p>EXCLUSIONS: The following type of activities shall not be eligible for finance under the Project:</p> <ul style="list-style-type: none"> • Activities that might cause long-term, permanent and/or irreversible adverse environmental impacts; • Significant loss or conversion of natural habitats; • Introduction of non-native plants or animals that pose a risk of becoming aggressively invasive species; • Activities that have high probability of causing serious adverse effects to human health and/or the environment (biodiversity); • Activities that cause harm to an area of international importance or cultural heritage and archaeological sites identified by UNESCO and/or the Government of Republic of Uzbekistan • Activities within Protected Areas that are not consistent with the valid Management Plans for those areas; • Activities that may have significant adverse social impacts and may give rise to significant social conflict; 	<p>These exclusions shall be applied as part of the assessment process conducted under action 1.2. above.</p>	FA PIU team

Material Measures and Actions		Timeframe	Responsible Entity/Authority
	<ul style="list-style-type: none"> Activities that require involuntary resettlement of people or their dwellings; Activities with adverse impacts on physical cultural resources; and All the other excluded activities set out in the ESMF of the Project. 		
1.5	<p>MANAGEMENT OF CONTRACTORS: Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors, subcontractors and supervising firms. Thereafter ensure that the contractors, subcontractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p> <p>Develop and implement procedures for managing Project workers, contractors, and subcontractors. This shall include the following:</p>	<p>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise contractors throughout Project implementation.</p>	FA PIU team
	<ul style="list-style-type: none"> a) Environmental and social requirements, consistent with sub-project specific ESIA/ESMP and LMP, shall be included in the procurement and contracting process, including bidding documents, for potential civil works. b) Relevant requirements shall be included in contracts and subcontracts consistent with the requirements of ESSs. c) Codes of conduct shall be required for contractors, subcontractors, primary suppliers, and their workers. d) Preparation of detailed ESMPs that are costed, with enough budget to adequately mitigate E&S risks. 	During procurement process as relevant, and before commencement of subproject activities, thereafter, maintained throughout Project implementation.	
	<ul style="list-style-type: none"> e) FA shall monitor contractor commitment and compliance with ESSs and contract and subcontract terms as applicable. f) Establish grievance mechanisms for contractors and subcontractors, workers, affected communities and other stakeholders to handle concerns and complaints. g) Ensure and require that contractors follow site-specific ESMPs and integrate/annex the relevant areas into contracts for civil works or landscape restoration. h) Ensure and require that contractors, subcontractors and supervising firms adopt and implement a subproject LMP consistent with the Project LMP and ESS2. 	Throughout Project implementation	

Material Measures and Actions		Timeframe	Responsible Entity/Authority
1.6	<p>PERMIT, CONSENTS AND AUTHORIZATIONS: Obtain or ensure that contractors obtain, as appropriate, the permits, consents, and authorizations that are applicable to the Project from relevant national authorities, in accordance with applicable laws and regulations and with the ESMF.</p> <ul style="list-style-type: none"> • Comply and cause contractors to comply, as appropriate, with the conditions established in these permits, consents, and authorizations throughout Project implementation. • Obtain Clearances from authorities of Uzbekistan as necessary. • Obtain non-objections from the Association as set out in the ESMF or otherwise necessary. 	Obtain permits, consents and authorizations prior to initiating activities, and thereafter comply with these permits, consents and authorizations throughout Project implementation.	FA PIU team
1.7	<p>TECHNICAL ASSISTANCE: Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	FA PIU team
1.8	<p>CONTRACTOR’S PERSONNEL: Contractor, subcontractors and supervising firms to appoint ESHS (Environmental, Social, Health and Safety) specialist/s to oversee requirements of the ESCP, ESMF and relevant supporting management plans on site.</p>	Throughout Project implementation.	FA PIU team / Contractors
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES (LMP): Finalize, adopt, and implement the LMP for the Project in accordance with ESS2 to the satisfaction of the Association including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (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. FA shall ensure compliance with the LMP by all Project workers and contracted firms and institutions. If the Project activities include community workers, the LMP shall be updated prior to engaging community workers in accordance with the relevant requirements of ESS2 and in a manner acceptable to the Association.</p>	LMP is prepared prior to appraisal and is finalized and disclosed prior to Project Negotiations and implemented throughout Project implementation.	FA PIU team

Material Measures and Actions		Timeframe	Responsible Entity/Authority
2.2	OCCUPATIONAL HEALTH AND SAFETY MEASURES (OHS): Ensure contractors, subcontractors and supervising firms prepare and implement occupational health and safety measures in accordance with ESS2 and the World Bank Group EHS Guidelines specified in the ESMF, LMP and subproject ESIA/ESMPs.	Adopt measures prior to engaging Project workers, and implement them throughout Project implementation	FA PIU team
2.3	WORKERS WORKING ENVIRONMENT: Ensure a non-discriminatory, decent work environment for all Project workers, consistent with ESS2, including by ensuring that all Project workers adhere to the ESHS code of conduct.	Adopt measures prior to engaging Project workers, and implement them throughout Project implementation	FA PIU team
2.4	GRIEVANCE MECHANISM FOR PROJECT WORKERS: Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. Require contractors to establish, maintain, and operate a grievance mechanism for contracted workers, as described in the LMP and consistent with ESS 2.	GM to be operationalized within 30 days of Project Effective Date and maintained thereafter throughout Project implementation.	FA PIU team
2.5	PROJECT WORKERS TRAINING: Require contractors to train contracted workers on Environment, Social, Health and Safety (ESHS) aspects relevant to the project to heighten awareness about their contractual obligations.	Complete trainings prior to start of civil works, and regular refresher trainings thereafter throughout Project implementation.	FA PIU team
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	Resource efficiency and pollution prevention and management measures shall be adopted under the ESIA's and/or ESMPs to be prepared under action 1.3 above, and shall also include, as needed, development of specific sub-management plans (such as Pest Management Plan, Waste Management Plan, Water and Wastewater Management Plan, Hazardous Materials Management Plan).	To be adopted prior to commencement of relevant Project activities and implemented throughout Project implementation.	FA PIU team
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY FROM CONSTRUCTION AND CONFLICT IMPACTS: The measures and actions necessary to assess and manage Project activity specific risks and impacts on communities in accordance with ESS4 shall be spelled out in the ESMF and subsequent subproject ESMPs.	Measures to be adopted prior to initiating Project activities, and thereafter maintained throughout Project implementation.	FA PIU team

Material Measures and Actions		Timeframe	Responsible Entity/Authority
4.2	<p>TRAFFIC AND ROAD SAFETY: In consultation with the host communities, adopt and implement measures and actions to assess and manage traffic and road safety risks – including those resulting from movement of Project related vehicles transporting Project workers and any project related goods and materials – on Project workers and the community, as required in the Project ESMF and subproject ESMPs.</p>	<p>Site specific plans to be prepared before subproject activity is initiated and implemented and maintained throughout Project implementation. General traffic and road management plan to be prepared as annex to the ESMP. Maintained throughout Project implementation.</p>	<p>FA PIU team</p>
4.3	<p>SEA AND SH RISKS: Prepare, consult, disclose, and thereafter implement a SEA/SH Action Plan and Code of Conduct as part of the Contractor’s ESMP to assess and manage the risks of SEA and SH.</p>	<p>Submit the SEA/SH Action Plan no later than 60 days of effective date for the Association’s prior review and no objection, adopt, and disclose the Plan before the preparation of the procurement documents. Once adopted, implement the Plan throughout Project implementation.</p>	<p>FA PIU team</p>
4.4	<p>TRAINING FOR THE COMMUNITY: As outlined in the ESMF and SEP, FA shall ensure trainings are delivered to the Project workers and the community to heighten their awareness on Project-related environmental and social risks and impacts and mitigation measures, including trainings on (not exhaustive):</p> <ul style="list-style-type: none"> • Communicable diseases, including COVID-19 • HIV-AIDS/STI/GBV/SEA/SH and Child/Forced labor awareness and prevention • Community grievance mechanism as described in the SEP/ ESMF/ Framework for Addressing GBV/SEA/SH. • Environmental and social requirements and good practices to be followed at construction sites. 	<p>Prior to initiating Project activity, with regular refresher training, maintained throughout Project implementation.</p>	<p>FA PIU team</p>

ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>LAND ACQUISITION AND RESETTLEMENT:</p> <p>a. The Project does not anticipate land acquisition and involuntary resettlement causing physical displacements due to direct Project construction works. The ESMF must include respective screening procedures to be implemented by the Project. Any proposed subprojects and activities must be screened against potential involuntary resettlement impacts in accordance with the ESMF. Subprojects and activities that would involve involuntary resettlement must be excluded. Livelihood impacts related to access restrictions to land, pastures, forests, and other natural resources, both within and outside of protected areas, shall be mitigated as further described in Section 5.2.</p> <p>b. However, if land is needed for the Project, it shall be acquired only through voluntary land transactions consistent with ESS5. The voluntary land transaction must follow the procedures outlined in the RPF and be consistent with requirements outlined in ESS5.</p>	<p>a. Before commencement of proposed subprojects and activities, maintained throughout Project implementation.</p> <p>b. The voluntary land transaction guidelines and the outlined process shall be followed and documented to the satisfaction of the Association for each subproject activities involving voluntary land transaction. This process shall be adopted and implemented prior to commencement of any Project activity.</p>	FA PIU team
5.2	<p>PROCESS FRAMEWORK and RESETTLEMENT POLICY FRAMEWORK (PF&RPF):</p> <p>Prepare, consult upon, and disclose the PF&RPF in a manner acceptable to the Association. The PF&RPF prepared for the Project shall be implemented to mitigate the risks and impacts related to restrictions of access to land, pastures, forests and other natural resources that would cause a community or groups within the community to lose or curtail their pre-existing livelihoods—both in legally designated protected areas and in any other lands to be restored under the Project. The PF&RPF shall be prepared in a participatory manner with the affected communities, further consulted upon with other interested parties, and disclosed and applied by FA.</p>	<p>The draft PF&RPF has been prepared, disclosed and consulted on prior to Project Negotiations. The PF&RPF shall be implemented throughout Project implementation.</p>	FA PIU team

ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>Identify and assess biodiversity related risks and impacts within the scope of Project activities requiring an ESIA/ESMPs, as per the project ESMF, and in a manner acceptable to the Association.</p> <p>Adopt and implement measures to address biodiversity related risks and impacts within the scope of specific ESMPs, as per the Project ESMF, and in a manner acceptable to the Association.</p> <p>If needed, develop, adopt and implement, in addition to E&S documents mentioned above, Project Biodiversity Management Plans (BMP), as per the Project ESMF, consistent with ESS6 and in a manner acceptable to the Association.</p>	<p>Identified and incorporated prior to finalization of the bidding documents for Project activities.</p> <p>Implemented throughout the Project implementation.</p>	FA PIU team
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
The standard is not relevant to the Project based on the screening against ESS 7.			
ESS 8: CULTURAL HERITAGE			
8.1	<p>In accordance with the guidance of the ESMF prepared for the Project: (i) identify and assess adverse risks and impacts of proposed Project activities on cultural heritage under respective sub-project ESIA/ESMPs; (ii) identify, adopt and implement measures (including incorporation into the design of subproject structures and activities) to avoid such risks and impacts.</p> <p>Prepare, adopt, and implement the chance finds procedure described in the ESMF developed for the Project.</p>	<p>Identified and incorporated prior to finalization of the bidding documents for Project activities.</p> <p>Implemented throughout the Project implementation.</p>	FA PIU team
ESS 9: FINANCIAL INTERMEDIARIES			
This standard is not relevant, as the project has no financial intermediaries.			

ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN: Adopt and implement a Stakeholder Engagement Plan (SEP) consistent with ESS10, in a manner acceptable to the Association, 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.</p> <p>Following the Project SEP, and prior to Project activities implementation, Project specific stakeholder engagement activities program shall be prepared and implemented, making use of different, culturally appropriate communication approaches which also ensure communication with the most disadvantaged and vulnerable groups.</p>	<p>Draft SEP was prepared, disclosed, and consulted on prior to appraisal; and updated version has been redisclosed prior to Project Negotiations.</p> <p>Stakeholder engagement activities program shall be prepared prior to Project activity implementation.</p>	FA PIU team
10.2	<p>GRIEVANCE MECHANISM FOR THE PROJECT: Update, adopt, maintain and operate a grievance mechanism (GM), as described in the SEP 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.</p> <p>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.</p>	GM shall be operationalized within 30 days of Project Effective Date.	FA PIU team
CAPACITY SUPPORT (TRAINING)			
CS1	<p>Training to be provided to relevant staff of FA, PIU staff and other involved agencies on:</p> <ul style="list-style-type: none"> – Preparation of site-specific ES instruments and specific aspects of environmental and social assessment as described in the ESMF – Biodiversity management issues and best practices – Relevant OHS issues including COVID-19 precautions – SEA/SH Action Plan, SEP and GM implementation – LMP – Prevention of and response to SEA/SH 	Within the first year of the project implementation, in order of relevance, followed by, at minimum, annual refresher trainings as needed throughout project implementation.	FA PIU team

<p>CS2</p>	<p>Training for Project workers on:</p> <ul style="list-style-type: none"> - Environmental and social requirements and good practices to be followed at construction sites - OHS including on emergency prevention and preparedness and response arrangements to emergency situations - COVID-19 infection safety awareness, community health and safety - SEA/SH risk prevention and LMP - Engagement and GM 	<p>The trainings shall be delivered at the commencement of engagement of Project workers, followed by, at minimum, one annual refresher training.</p>	<p>FA PIU team and Contractors</p>
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