

# **Wildlife Conservation Society**

## **Integrated watershed management of the Putumayo-Içá River basin project (P172893)**

### **Negotiated Version ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)**

**April 20, 2022**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Wildlife Conservation Society (WCS) is implementing the *Integrated watershed management of the Putumayo-Icá River basin project* (the **Project**), with the involvement of the Ministry of Environment, Water and Ecological Transition (Ecuador), Ministry of Environment and Sustainable Development (Colombia), State Secretariat of Environment of Amazonas State (Brazil), and Ministry of Environment (Peru). The International Bank for Reconstruction and Development (hereinafter the **Bank**), acting as the implementing agency of the Global Environmental Facility (GEF), has agreed to provide financing for the Project.
2. WCS shall implement material measures and actions for the Project to be implemented in accordance with the Bank's Environmental and Social Standards (**ESSs**). This Environmental and Social Commitment Plan (**ESCP**) sets out the material measures and actions and all specific documents or plans, as well as the timeframe for carrying out each of them.
3. WCS shall also comply with, and cause compliance by the ministries and agencies of governments referred to in point 1 above, with the provisions of all other environmental and social documents to be prepared for this Project required under the ESSs and referred to in the ESCP, such as the Environmental and Social Management Framework (ESMF), Environmental and Social Management Plan (ESMP), Labor Management Procedures (LMP), Process Framework (PF), Indigenous Peoples Planning Framework (IPPF), Indigenous Peoples Plans (IPPs) and Stakeholder Engagement Plans (SEP), in addition to the schedules specified in such environmental and social documents.
4. WCS is responsible for compliance with all ESCP requirements. WCS shall enter into Inter-institutional Cooperation Agreements with the ministries and government agencies referred to in point 1. above to coordinate the implementation of specific measures and actions requiring the participation of such ministries and government agencies.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by WCS as required by the ESCP and the conditions of the legal agreement. 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 WCS, 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, WCS will agree to the changes with the Bank and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters of agreements signed between the Bank and WCS represented by its Regional Director, Andes, Amazonia & Orinoco. WCS will promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>PERIODIC REPORTING</b></p> <p>Prepare and submit to the Bank regular monitoring reports on the project's environmental, social, health and occupational safety (ESHS) performance, including: (i) the implementation of the ESCP; (ii) status of preparation and implementation of E&amp;S documents required under the ESCP; (iii) stakeholder engagement activities – SEP, and iv) functioning of the grievance mechanism (s).</p> <p>WCS shall ensure that it has the appropriate institutional arrangements, systems, resources, and staff to consolidate and issue follow-up reports and ensure the inclusion in periodic reports of preventive and corrective actions implemented by the entity responsible for them and/or WCS recommendations in this regard.</p>	<p>Deliver <b>6-month reports</b> throughout Project implementation no later than 30 days after the end of each semester. The first report shall be delivered 30 days after the end of the first semester from the Grant Agreement Effectiveness Date.</p>	WCS
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly notify the Bank of any incident or accident related to the Project which has or may have a significant adverse effect on the environment, the affected communities, the public or workers (e.g., fatalities, child labor cases, sexual exploitation or abuse, gender-based violence, sexual harassment in the workplace, ethnic discrimination or xenophobia, impacts on natural habitats). Such Preliminary Report ("Preliminary Report") should provide sufficient details about the incident or accident, and indicate the immediate measures taken or that are planned to be taken to address it, and any information provided by project workers, as appropriate. Subsequently, if necessary and if requested by the Bank, prepare an Extended Report ("Extended Report") on the incident or accident, and propose measures to prevent its recurrence.</p> <p>WCS shall extend this obligation, in relevant agreements, to ministries and government agencies, civil society organizations participants (Subproject Beneficiaries) and contractors and/or consultants, and shall cause these parties to notify WCS of incidents and accidents.</p> <p>The guide "Responses to environmental, social and occupational health and safety incidents for World Bank (WB)-funded projects" shall be included as an annex to the ESMF.</p>	<p>WCS shall notify the Bank:</p> <p>(i) Preliminary Report, to be submitted within 48 hours after learning of the incident or accident, and</p> <p>(ii) Extended Report, if required by the Bank, to be submitted within the timeframe acceptable to the Bank and considering the nature and characteristics of the incident or accident.</p>	WCS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
C	<p><b>MONTHLY REPORTS OF CONTRACTORS AND/OR CONSULTANTS</b></p> <p>WCS shall require periodic follow-up reports in contractors' and consultants' contracts. The periodicity of such reports shall be determined by WCS in a timely manner on account of the scope of the contracts concerned. Such reports provided by contractors and/or consultants shall be included in the 6-month project progress reports to be provided by WCS to the Bank (see action A).</p> <p>WCS shall cause Contractors and Consultants to submit periodic reports to WCS.</p>	<p>WCS shall provide the Bank with 6-month project progress reports (in accordance with action A above), which shall in turn include periodic reports from contractors and/or consultants that WCS hires.</p>	<p>WCS</p>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>WCS shall establish and maintain an organizational structure in the Project Implementation Unit to manage environmental, health and safety risks, and social risks. This structure must consist of at least one environmental leader, a social leader, an occupational health and industrial safety professional, and a professional responsible for managing the grievance and grievance mechanism.</p> <p>In addition, and according to the specific conditions of each area, WCS shall have the support of professionals specialized in social sciences and / or anthropology, communication, biotics, hydrology, remediation of contaminated sites, specialist in water resource management, forestry or those that are required in the Project.</p> <p>If required, and as a result of its evaluation, the Bank may request the inclusion of support professionals for time periods and in accordance with the needs identified in the Bank's assessment and suggested changes to the ESCP under paragraph 6 above, in which case WCS shall manage the increase of professional personnel, in accordance with environmental and social requirements to ensure the proper environmental and social management of the Project.</p>	<p>The basic organizational structure of the Project Implementation Unit shall be established within 60 days after the Grant Agreement Effectiveness Date and shall be maintained throughout the period of Project implementation.</p>	<p>WCS</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
1.2	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b></p> <p>WCS shall be responsible for conducting the Environmental and Social Assessment (ESA) of the Project as part of the preparation of the Environmental and Social Management Framework (ESMF). The ESA shall identify and evaluate the environmental and social risks and impacts that may arise throughout the Project cycle in accordance with the ESSs.</p> <p>If required, the ESA shall be updated and deepened when the Bank deems it relevant.</p> <p>The ESMF and other environmental and social management documents that the ESA considers necessary shall be subject to consultation with the relevant stakeholders before submitting them for final no objection by the Bank. The main management tools and instruments correspond to the Project Environmental and Social Management Framework (ESMF), which shall include the Environmental and Social Assessment (ESA), the General Environmental Social Management Plan (ESMP), the Labor Management Procedures (LMP), the Process Framework (PF), the Indigenous Peoples Planning Framework (IPPF) and the Stakeholder Engagement Plan (SEP).</p> <p>The consultation of environmental and social management instruments shall take into account the World Bank Technical Note on consultation in times of social restriction due to the COVID-19 pandemic (Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings, March 20, 2020).</p>	<p>The draft version of the ESMF (including ESA, ESMP, LMP, PF, IPPF and SEP) shall be submitted to the Bank for review no later than 30 days after the Grant Agreement Effectiveness Date. Such draft shall be consulted during implementation and a final version sent to the Bank for review and approval before carrying out any activity under Parts 1.A(ii), 1.A(iii), 1.A(iv), 1.B(i), 1.B(ii), 2.A(i)(b), 2.A(i)(e), 2.A(ii), 2.B(i), 2.B(ii), and 2.B(iii) of the Project as included in the Grant Agreement. Once it is approved, it shall be disclosed and adopted throughout the period of Project implementation.</p>	WCS
1.3	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>Implement Project activities in accordance with the ESMF and prepare, adopt and implement, or cause the preparation, adoption or implementation of the specific Environmental and Social Management Plans (ESMP) when necessary for the Subprojects and other activities according to the criteria established in the ESMF updating these instruments as required and in a manner acceptable to the Bank.</p>	<p>The ESMP shall be prepared and submitted to the Bank for approval; the ESMPs approved by the Bank shall be adopted and disclosed, prior to tenders and included in the respective contracts, or prior to the commencing of the activities that require compliance with the ESMP. Subsequently such Plans shall be implemented, or shall cause them to be implemented throughout the period of Project implementation.</p>	WCS

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
1.4	<p><b>HANDLING CONTRACTORS AND/OR CONSULTANTS</b></p> <p>a) Incorporate the relevant aspects of this ESCP, including the corresponding environmental and social documents or plans and the Labor Management Procedures (LMP), including the WCS code of conduct applicable to all contractors and / or consultants of the Project, in the corresponding environmental, social, labor, health and safety specifications; within the bidding and procurement documents with contractors and consulting firms in the respective contracts.</p> <p>b) Ensure that contractors and / or consultants comply in their respective contracts with the environmental, social, labor, health and safety specifications and the code of conduct in which explicit reference is made to the pertinent actions to prevent situations of discrimination, violation of girls, boys and adolescents, and the prevention and response to situations of Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) in the workplace. In turn, the contractors shall ensure that their subcontractors comply with these obligations.</p>	<p>a) Before opening the corresponding bidding or consultant hiring processes.</p> <p>b) Throughout the Project implementation.</p>	<p>a) WCS</p> <p>b) WCS</p>
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Develop, adopt, and implement and cause to be implemented, the Labor Management Procedures (LMP) developed as part of the Project's ESMF.</p>	<p>The final version of the LMP shall prepared and sent to the Bank for no objection no later than 30 days after the Grant Agreement Effectiveness Date. Once approved, hiring processes can start. It shall be implemented, and may be updated as may be needed, throughout the period of Project implementation.</p>	<p>WCS</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish, maintain and apply and cause it to be applied, a procedure for handling complaints and claims for all project workers, described in the LMP and in line with the requirements of ESS 2 and the general mechanism for handling complaints and claims by the Project.</p> <p>This process must guarantee <u>anonymity</u> and confidentiality for claims associated with possible situations of discrimination, unfair work or cases of SEA and SH in the workplace. If WCS is legally obliged to report the complaint or claim to the authorities, it shall inform the victim of this before receiving the information.</p>	No later than 30 days after the Grant Agreement Effectiveness Date. It shall be implemented, and updated as may be needed, throughout the period of the Project implementation.	WCS
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>a) As part of the ESMF and the LMP, Occupational Health and Safety (OSH) measures shall be developed to protect the integrity of the health and safety of all Project workers.</p> <p>b) Incorporate OSH measures in the bidding documents and in the contracts with contractors and / or consultants that carry out activities for the Project.</p> <p>c) Ensure that the measures specified in the Project's ESMF are implemented in each work site for all Project workers.</p> <p>The World Bank Environmental, Health and Safety (EHS) Guidelines shall be included as an annex to the ESMF.</p>	<p>a) The final version of the ESMF shall be furnished to the Bank for its review and no objection no later than 30 days after the Grant Agreement Effectiveness Date.</p> <p>b) Before opening the corresponding bidding processes.</p> <p>c) Throughout the period of Project implementation.</p>	<p>a) WCS</p> <p>b) WCS</p> <p>c) WCS</p>
<b>ESS3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
3.1	<p><b>WASTE MANAGEMENT</b></p> <p>As part of the ESMF, a Waste Management Plan shall be prepared, establishing the general measures and guidelines in accordance with ESS 3, for the management of waste produced by the actions during the implementation of the Project.</p> <p>The Waste Management Plan shall include the specific requirements that comply with the Minamata Convention to protect human health and the environment from the adverse effects of the hazardous materials that will be handled (including mercury and other contaminants).</p> <p>The Guide on Environment, Health and Safety of the World Bank shall be included as an annex to the ESMF.</p>	<p>The final version of a Waste Management Plan shall be ready no later than 30 days from the Grant Agreement Effectiveness Date and shall be sent to the Bank for approval.</p> <p>The Plan shall be implemented throughout the period of Project implementation.</p>	WCS
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Within the ESMF, WCS shall establish the guidelines so that the Subproject Beneficiaries in charge of the Subprojects and the contractors and / or consultants comply with the requirements of the ESMF regarding the selection of remediation technologies, and the activities, protocols and measures that must be considered to prevent and minimize significant negative impacts on the environment.</p> <p>The Guide on Environment, Health and Safety of the World Bank shall be included as an annex to the ESMF.</p>	<p>The final version of the ESMF shall be ready no later than 30 days from the Grant Agreement Effectiveness Date and shall be implemented throughout the period of the Project implementation.</p>	WCS
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
4.1	<p><b>COMMUNITY HEALTH AND SAFETY</b></p> <p>a) Within the Project's ESMF, WCS shall establish the guidelines for the civil society organizations participants in charge of the subprojects and the contractors and / or consultants to prepare and adopt Community Health and Safety measures as part of the Environment and Social Management Plans, including mitigation measures and risk management related to the influx of workers and labor in the communities, the spread of diseases, and in a particular and differentiated way, the measures that allow safe and universal access of the population to all those places that are for collective use and enjoyment.</p> <p>b) Likewise, as part of the ESMF, the WCS Emergency Response Plan (natural and/or operational, e.g., floods, fires, etc.) shall be incorporated including measures in coordination with the pertinent local authorities and potentially affected communities. The arrangements for the prevention, preparation, and response to emergencies to be implemented with the Project workers by the civil society entities and the contractors and/or consultants will be taken into account.</p>	<p>a) The final version of the ESMF will be ready no more than 30 days after the Grant Agreement Effectiveness Date and shall be implemented throughout the period of Project implementation.</p> <p>b) The final version of the ESMF shall be ready no later than 30 days after the Grant Agreement Effective Date and shall be implemented throughout the period of Project implementation.</p>	<p>a) WCS</p> <p>b) WCS</p>
4.2	<p><b>GBV AND SEA RISKS</b></p> <p>As part of the ESMF, actions to prevent Gender Violence (GBV), SEA and SH in the workplace shall be incorporated, which are identified in the environmental and social assessment contained in said ESMF.</p>	<p>It shall be incorporated in the final version of the ESMF and shall be ready no later than 30 days after the Grant Agreement Effectiveness Date.</p> <p>It shall be implemented throughout the period of Project implementation.</p>	WCS
4.3	<p><b>SECURITY MANAGEMENT PLAN</b></p> <p>Develop and adopt a Security Management Plan that includes an assessment of physical security risks, measures to coordinate action with public forces, and the need for additional security services, among other things, which shall consist of the ESS4 of the WB ESF.</p>	<p>No more than three months after the Grant Agreement Effectiveness Date.</p> <p>The plan shall be implemented throughout the period of Project implementation.</p>	WCS
<b>ESS 5: LAND ACQUISITION, LAND USE RESTRICTIONS AND INVOLUNTARY RESETTLEMENT</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
5.1	<p><b>PROCESS FRAMEWORK</b></p> <p>Prepare, consult, adopt, implement and/or cause to be implemented a Process Framework (PF) in accordance with ESS 5 and in a manner acceptable to the Bank.</p> <p>The Process Framework shall be carried out at a preventive level to adequately manage the potential impacts or restrictions on land use or access to natural resources that the Project may cause during its implementation.</p>	A draft version of the Process Framework, shall be sent to the Bank for approval no later than 30 days after the Grant Agreement Effectiveness Date. Such draft shall be consulted during implementation and a final version sent to the Bank for review and approval before carrying out any activity under Parts 1.A(ii), 1.A(iii), 1.A(iv), 1.B(i), 1.B(ii), 2.A(i)(b), 2.A(i)(e), 2.A(ii), 2.B(i), 2.B(ii), and 2.B(iii) of the Project, as included in the Grant Agreement. Once it is approved, it shall be adopted and implemented, and updated, as needed, throughout the period of Project implementation.	WCS
5.2	<p><b>GRIEVANCE AND COMPLAINT MECHANISM</b></p> <p>Prepare a grievance mechanism (GM) described in the Process Framework, in accordance with ESS 10 and with the general mechanism for complaints and claims of the Project. This GM shall address complaints regarding possible risks to the use of land or access to natural resources.</p>	No later than 30 days after the Grant Agreement Effectiveness Date and implemented throughout the period of Project implementation.	WCS
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p><b>BIODIVERSITY RISKS AND IMPACTS</b></p> <p>As part of the ESMF, WCS shall consider the potential direct and indirect and cumulative impacts of the Project on the habitats and biodiversity that they support, particularly the use of natural resources, development of economic chains and remediation actions for contamination by mercury and other pollutants, and shall determine general guidelines in accordance with ESS 6 to minimize impacts and to restore and / or protect biodiversity in accordance with the mitigation hierarchy established in ESS 1, ESS 6 and in a manner acceptable to the Bank.</p>	No later than 30 days after the Grant Agreement Effectiveness Date and shall be implemented throughout the period of Project implementation.	WCS
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
7.1	<p><b>INDIGENOUS PEOPLES PLANNING FRAMEWORK (IPPF)</b></p> <p>Prepare, consult, disseminate, adopt, and implement an Indigenous Peoples Planning Framework (IPPF), in accordance with ESS 7 and in a manner acceptable to the Bank. The IPPF shall be applicable to territorial planning activities and instruments that could potentially have an impact on the livelihoods of indigenous peoples or their customary rights and practices.</p>	<p>The draft version of the IPPF will be sent to the Bank no later than 30 days after the Grant Agreement Effectiveness Date. Such draft shall be consulted during implementation and a final version sent to the Bank for review and approval before carrying out any activity under Parts 1.A(ii), 1.A(iii), 1.A(iv), 1.B(i), 1.B(ii), 2.A(i)(b), 2.A(i)(e), 2.A(ii), 2.B(i), 2.B(ii), and 2.B(iii) of the Project, as included in the Grant Agreement. Once it is approved, it shall be implemented throughout the period of Project implementation.</p>	WCS
7.2	<p><b>INDIGENOUS PEOPLES PLAN</b></p> <p>Prepare or cause the Indigenous Peoples Plans (IPPs) to be prepared in accordance with the guidelines of the Project's IPPF and ESS 7, in the event that the social evaluation defines the existence of Indigenous Peoples present or of people who have a collective attachment to the Project area and are affected by its activities.</p>	<p>During the implementation of the Project, prior to carrying out the activities that require the preparation of the respective IPPs. The IPPs shall be submitted to the Bank for No Objection, and thereafter implemented in accordance with their terms.</p>	WCS
7.3	<p><b>GRIEVANCE MECHANISM</b></p> <p>Prepare, implement, and cause the implementation of a culturally appropriate grievance mechanism in accordance with ESS 7 and ESS 10 and the general grievance mechanism of the project, which shall be included in the Project's IPPF and in the IPPs to be prepared.</p>	<p>No later than 30 days after the Grant Agreement Effectiveness Date. It shall be implemented, and may be updated as necessary, throughout the period of Project implementation.</p>	WCS
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<p><b>CHANCE FINDINGS</b></p> <p>Prepare, adopt, and implement the chance finds procedure described in the ESMP developed for the Project.</p>	<p>The final version of the ESMP to be included in the ESMF shall be ready no later than 30 days after the Grant Agreement Effectiveness Date and shall be implemented throughout the period of Project implementation.</p>	WCS
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
Not relevant to this Project.			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b></p> <p>a) Consult and disseminate the draft version of the Stakeholder Engagement Plan (SEP) before the Project appraisal, and subsequently update it. The consultations in this phase shall consider the sanitary recommendations and the technical note “Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings”.</p> <p>b) Implement the SEP, guaranteeing participatory spaces and under a culturally and socially appropriate approach for all interested parties.</p>	<p>a) The SEP shall be prepared and sent to the Bank for no objection no later than 30 days from the Grant Agreement Effectiveness Date. Once approved, it shall be disclosed and adopted.</p> <p>b) The SEP shall be implemented throughout the period of Project implementation.</p>	WCS
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>Prepare, adopt, maintain, and operate a grievance mechanism, as described in the SEP and in accordance with ESS10, that is culturally and socially appropriate.</p>	<p>The Project Grievance Mechanism described in SEP shall begin to operate for the Project before the evaluation (appraisal stage) of the Project and shall remain operational and throughout the period of Project implementation.</p> <p>The semiannual reports on the management and results of the Grievance Mechanism shall be included as part of the reports delivered to the Bank.</p>	WCS
<b>CAPACITY SUPPORT (TRAINING)</b>			
CS1	<p>Develop a training plan for the Project for effective management of environmental and social risks, detailed in the ESMF, in a manner acceptable to the Bank. Once approved, implement the plan, and update it annually according to the emerging needs of the Project.</p>	<p>No later than three (3) months after the Grant Agreement Effectiveness Date, present a detailed training plan with a schedule, actors to be trained, budget, goals, and indicators.</p> <p>Annually, present an update of the Plan, including planning of training activities planned for next year.</p> <p>Report the implementation of the training plan and the monitoring of its indicators in the semi-annual reports of environmental and social performance of the Project.</p>	WCS