

THE UNITED REPUBLIC OF TANZANIA



Financial Access for Sustainable and Transformational Growth (FAST) Project (P500471)

Draft ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

November 2025

1. Tanzania will launch the Financial Access for Sustainable and Transformational (FAST) Growth project, managed by the Bank of Tanzania with funding from the International Development Association (IDA), involving a new Credit Guarantee Corporation and Participating Financial Intermediaries.
2. The BoT, CGC and PFIs shall implement material measures and actions so that the Project is implemented following the Environmental and Social Standards (ESSs). 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 Recipient shall also comply with the provisions of any other Environmental and Social (E&S) Documents required under the ESF and referred to in this ESCP, including but not limited to the Environmental and Social Management System (ESMS), Stakeholder Engagement Plan (SEP) and the timelines specified in those E&S documents.
4. The Recipient is responsible for compliance with all requirements of the ESCP even when the implementation of the specific measures and actions is conducted by BoT, CGC and PFIs, or other entities.
5. 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 (World Bank) will monitor and assess progress and completion of the material measures and actions throughout the implementation of the Project.
6. As agreed by the Association and the Recipient, 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 the assessment of Project performance conducted under the ESCP itself. In such circumstances, the Recipient will agree to the changes with the Association and will update the ESCP to reflect such changes. Agreement on changes to the ESCP will be documented through the exchange of letters signed between the Association (World Bank) and the Recipient. The Recipient (MOF) 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 Recipient shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include risks and impacts on the environment, community and occupational health and safety, gender-based violence and labour conditions.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
Monitoring and Reporting			
A	REGULAR REPORTING: <ol style="list-style-type: none"> 1. Prepare and submit to the Association regular E&S health and safety (ESHS) performance reports, including: ESCP implementation; preparation and implementation of E&S instruments (including ESMS of BoT, CGC and PFIs); capacity building; stakeholder engagement; grievance mechanism functioning; and information disclosure. 	Every six months throughout Project implementation.	BoT
	<ol style="list-style-type: none"> 2. Require and ensure that the CGC and PFIs submit regular E&S performance reports to BoT in accordance with ESMS reporting requirements. 	Semi-annually (every six months) throughout Project implementation.	BoT; CGC and PFIs (reporting to BoT)
	<ol style="list-style-type: none"> 3. Prepare and submit annual reports summarizing training and capacity-building activities delivered to CGC, PFIs, and Micro, Small, and Medium Enterprise (MSMEs) on ESMS implementation and E&S risk management. 	Annually	BoT

B	INCIDENTS AND ACCIDENTS:		
	<p>i. Promptly notify the World 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 affected communities, the public, or workers including Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH). Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, corrective actions taken, compensation paid, and any information provided by any contractor and supervising entity, as appropriate, findings of the Root Cause Analysis (RCA). Subsequently, as per the Association's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence. The Recipient shall also impose corresponding reporting obligations on the CGC, PFIs, and other implementing agencies including through provisions in their loan agreements.</p>	<p>Initial notification: within 48 hours of becoming aware.</p> <p>RCA and follow-up report: within 15 days or as requested.</p> <p>SMEs to notify PFIs within 24 hours; PFIs to notify CGC within 24 hours; CGC to notify BoT within 24 hours.</p> <p>maintained throughout implementation.</p>	<p>MOF, BOT, CGC, and PFIs</p> <p>MOF, BOT, CGC, PFIs and MSMEs</p>
	<p>ii. Develop and maintain environmental and social operational and training manuals for CGC, PFIs and SMEs, including procedures for ESMS implementation, reporting of incidents and accidents, and E&S monitoring.</p>	<p>Manuals prepared prior to disbursement of IDA funds to BoT</p>	<p>BoT</p>
	<p>iii. Submit periodic training reports covering implementation of incident and accident notification procedures and E&S monitoring protocols.</p>	<p>Quarterly</p>	<p>BoY</p>

ESS1 Assessment and Management of Environmental and Social Risks and Impacts			
1.1	ORGANIZATIONAL STRUCTURE:		
	i. BoT shall maintain an organizational structure with qualified staff and adequate resources to support E&S risk management for the Project, including the appointment of a full-time Environmental and Social Officer.	E&S Officer appointed within 30 days after the Effective Date and maintained throughout Project implementation.	BoT
	ii. BoT shall require the CGC to maintain an organizational structure with dedicated E&S staff and capacity to implement its ESMS and oversee E&S performance of PFIs and the guaranteed portfolio.	CGC to appoint its full-time E&S Officer prior to commencement of activities and maintain throughout Project implementation.	BoT and CGC
	iii. BoT shall require PFIs to designate E&S personnel responsible for ESMS implementation, stakeholder engagement, grievance management, gender-based risks, and reporting. This will form the eligibility criteria for PFIs.	PFIs to designate required E&S focal points prior to signing guarantee agreements and maintain throughout their participation in the Project.	Bot, CGC and PFIs
	iv. BoT shall develop E&S capacity-building tools and training modules for CGC, PFIs, and MSMEs to support ESMS implementation and E&S risk management.	Prior to commencement of activities.	BoT

1.2	ENVIRONMENTAL AND SOCIAL ASSESSMENT/ MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS		
	i. BoT shall develop, disclose, adopt, and maintain a Project-level ESMS consistent with ESS9, proportionate to the risk profile of Component 1.	ESMS for Component 1 developed and disclosed prior to disbursement of IDA funds to BoT; maintained throughout implementation.	BoT
	ii. BoT shall ensure that Project ESMS requirements are cascaded to CGC, PFIs, and MSMEs through guarantee agreements, sub-loan agreements, and operational procedures.	Corporate ESMS of CGC to be assessed and approved by the Association prior to disbursement to CGC	BoT, World Bank
	iii. CGC shall develop, adopt, implement, and maintain an ESMS proportionate to its role as a credit guarantee institution and consistent with ESS9.	CGC ESMS developed, disclosed, and operational prior to commencement of Component 1 activities; maintained throughout implementation.	BOT and CGC
	iv. PFIs shall ensure that MSMEs comply with national environmental and social laws and prepare E&S instruments (E&S management plans (ESMPs) or simplified plans) consistent with the PFI ESMS and Project ESMS requirements, as applicable.	ESMPs or simplified risk assessments prepared and approved by PFIs prior to PFI financing of SMEs.	PFIs; CGC; BoT
	v. CGC shall require PFIs to ensure that MSMEs conduct Social Assessments (SA), where relevant, and integrate outcomes into their ESMS, stakeholder engagement plan (SEP), and ESMPs. The SA shall cover issues related to labor and working conditions (ESS2), gender based violence (GBV) & SEA/SH, community health and safety (ESS4), and vulnerable groups (ESS7).	Social Assessment prepared, consulted, and disclosed prior to disbursement under Component 1, and updated as needed during implementation.	BoT, CGC and PFIs

1.4	<p>EXCLUSIONS:</p> <p>i. Ensure that the ESMSs and the environmental and social operational and training manuals shall integrate and build upon the Exclusion List below in order to ensure that the MSMEs, and PFIs understand with specificity and only with the various terms mentioned in exclusion list.</p>	Throughout the implementation of the Project	BOT
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	<p>ii. The following list of activities shall be ineligible for financing under the Project:</p> <ul style="list-style-type: none"> • Any activities resulting or anticipated to result in land acquisition, permanent or temporary physical or economic displacement. • Any activities involving adverse impacts on biodiversity conservation and sustainable management of living natural resources. • Any activities that have adverse impacts on cultural heritage as defined under ESS 8. • Production or trade in any product or activity deemed illegal under the Recipient's laws or regulations or ratified international conventions and agreements. • Production or trade in weapons or munitions • Gambling, casinos and equivalent enterprises. • Trade in wildlife or wildlife products regulated under Convention on International Trade in Endangered Species (CITES) • Production or trade in radioactive materials (this does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where the Association considers the radioactive source to be trivial and/or adequately shielded). • Production or trade-in or use of unbounded asbestos fibers. This does not apply to purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%. • Drift net fishing in the marine environment using nets in excess of 2.5 km in length. • Purchase of logging equipment for use in cutting forests. • Production or trade in wood or other forestry products other than from sustainably managed forests • Production or trade in pharmaceuticals subject to international phase outs or bans. 	<p>Throughout Project implementation as part of the assessment process conducted under action 1.2 above.</p>	<p>BoT, CGC, PFIs and MSMEs</p>
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	<ul style="list-style-type: none"> • Production or trade in pesticides/herbicides subject to international phase outs or bans. • Fishing in the marine environment using electric shocks and explosive materials. • Any activities that would curtail workers fundamental rights. These would include: (i) freedom of association and the effective recognition of the right to collective bargaining; (ii) prohibition of all forms of forced or compulsory labor; (iii) prohibition of child labor, including without limitation the prohibition of persons under 18 from working in hazardous conditions (which includes construction activities), persons under 18 from working at night, and that persons under 18 be found fit to work via medical examinations; (iv) elimination of discrimination in respect of employment and occupation, where discrimination is defined as any distinction, exclusion or preference based on race, color, sex, religion, political opinion, national extraction, or social origin. • Commercial logging operations in primary tropical moist forests • Production or trade in products containing Polychlorinated biphenyls (PCBs). • Production or trade in ozone depleting substances subject to international phase out. • Production, trade, storage, or transport of significant volumes of hazardous chemicals, or commercial scale usage of hazardous chemicals (includes gasoline, kerosene, and other petroleum products). • Production or storage or packaging of inflammable material. • Production or trade or use or storage of dyeing chemicals and dye intermediaries. • Any activities requiring industrial production processes requiring regulatory clearances from Pollution Control Boards • Production or activities that impinge on the lands owned or claimed. under adjudication, by indigenous peoples, without full documented consent of such peoples 		
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ESS2 Labor and Working Conditions			
2.1	LABOR MANAGEMENT PROCEDURES:		
	i. CGC shall maintain and implement labor management and human resources (HR) policies and procedures consistent with national law and ESS2, including Codes of Conduct addressing SEA/SH and child labor prevention. CGC shall ensure all its workers are aware of and have access to these policies.	Throughout Project implementation	BoT and CGC
	ii. BoT shall require PFIs to maintain HR policies and procedures consistent with ESS2, including requirements on non-discrimination, OHS, workers' rights, and grievance mechanisms for workers. These requirements shall be embedded in guarantee agreements with PFIs and will form one of the eligibility criteria for PFIs.	PFIs' HR policies reviewed prior to PFI participation and maintained throughout Project implementation.	BoT, CGC, PFIs
	i. CGC shall develop a simplified Labor Management Procedure (LMP) template for MSMEs, and PFIs shall ensure that MSMEs adopt the template (or equivalent ESS2-compliant LMP) proportionate to their operations.	CGC LMP template developed prior to commencement of Component 1. MSMEs adopt LMP prior to receiving financing.	CGC PFIs and MSME

¹ In accordance with ESS 2, clause 8, MOF/government civil servants working on the project will remain subject to the terms and conditions of their existing public sector employment agreement or arrangement except for protecting the work force and occupational health and safety.

2.5	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES:</p> <ul style="list-style-type: none"> i. BoT and CGC shall adopt and implement Project-specific occupational health & safety (OHS) procedures consistent with ESS2 and national occupational safety laws. These procedures shall be integrated into the Project ESMS. ii. BoT shall require CGC and PFIs to ensure that MSMEs apply OHS measures proportionate to their risk level, including (as applicable) ESMPs or simplified risk management plans, and maintain required OHS licenses and permits prior to receiving financing. 	<p>Adopt prior to commencement of Project activities and implement throughout Project implementation.</p> <p>OHS requirements implemented prior to disbursement to MSMEs and monitored throughout implementation.</p>	<p>BoT and CGC</p> <p>BoT, CGC, PFIs and MSMEs</p>
2.6	<p>GRIEVANCE MANAGEMENT:</p> <ul style="list-style-type: none"> i. BoT and CGC shall establish, maintain, and operate an accessible grievance mechanism (GM) for their own Project workers, consistent with national labor laws and ESS2. The GM shall be clearly communicated to all Project workers. 	<p>GM established prior to engaging Project workers; updated in accordance with the LMP and maintained throughout Project implementation.</p>	<p>BoT, CGC</p>
	<ul style="list-style-type: none"> ii. BoT shall require PFIs to establish and maintain employee/worker GMs consistent with ESS2, and CGC shall verify their adequacy as part of PFI ESMS requirements. 	<p>PFIs' GMs in place prior to signing guarantee agreements; maintained throughout Project implementation.</p>	<p>BoT, CGC and PFIs</p>
	<ul style="list-style-type: none"> iii. PFIs shall require MSMEs to maintain a simple, accessible worker GM consistent with national labor law and ESS2, proportionate to the size and risk profile of the MSME. 	<p>MSMEs' worker GMs established prior to receiving PFI financing; maintained throughout SME participation in the Project.</p>	<p>PFIs, MSMEs and CGC</p>

	iv. BoT shall include a summary of worker-related grievances in the semi-annual ESHS monitoring reports submitted to the World Bank.	Semi-annually, through Project Progress Reports.	BoT
ESS3 Resource Efficiency and Pollution Prevention and Management			
3.1	i. Integrate resource efficiency and pollution prevention and management requirements consistent with ESS3 into the ESMS of BoT, CGC, and PFIs, and ensure these requirements are included in guarantee agreements and sub-loan agreements with MSMEs.	Throughout Project implementation.	BoT, CGC, PFIs
	ii. In accordance with national law, the Project ESMS, and ESS3, require PFIs to ensure that MSMEs identify and manage resource efficiency and pollution-related risks through appropriate E&S instruments (e.g., ESMPs or simplified risk plans). These measures shall be incorporated into MSME ESMPs prior to financing.	Measures to be included in ESMPs/SPR prior to PFI financing of MSMEs and implemented throughout Project implementation.	PFIs; MSMEs (contractual obligation); CGC (oversight); BoT
ESS4 Community Health and Safety			
4.1	i. BoT shall prepare, disclose, adopt, and implement a Project-level GBV/SEA/SH Action Plan, consistent with ESS4 and national frameworks, including survivor-centered reporting channels and referral pathways. The GBV/SEA/SH Action Plan shall apply to BoT, CGC, PFIs, and SMEs. CGC and PFIs shall be required to adopt and implement the Plan and integrate relevant measures into their ESMS and operations.	GBV/SEA/SH Action Plan prepared and disclosed prior to disbursement of IDA funds to BoT and implemented throughout Project implementation.	BoT; CGC and PFIs, MSMEs
	ii. BoT shall require CGC and PFIs to ensure that MSMEs identify, assess, and manage community health and safety risks (including GBV/SEA/SH, traffic safety, hazardous materials, and emergency preparedness), and integrate relevant measures into ESMPs or simplified risk plans, in accordance with ESS4 and national laws.	Community health and safety measures included in ESMPs/SPR prior to MSME financing and implemented throughout MSME participation.	PFIs; MSMEs, CGC; BoT

	iii. PFIs shall ensure that MSMEs prepare required E&S instruments (ESMPs or where applicable ESIA), in line with national law—including environmental permitting requirements—and submit them to PFIs for review and approval prior to financing.	Prior to disbursement of funds to MSMEs.	PFIs; SMEs; CGC (oversight); BoT (supervision)
ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement			
5.1	i. Consistent with Action 1.2 (ESMS requirements), any activities that cause or are anticipated to cause land acquisition, involuntary resettlement, or permanent/temporary physical or economic displacement shall be ineligible for financing under the Project.	Throughout Project implementation.	BoT; CGC; PFIs
	ii. BoT shall ensure that CGC and PFIs apply an ESS5 exclusion screening mechanism as part of PFI and MSME appraisal. This includes: <ul style="list-style-type: none"> • exclusion of any subprojects requiring land acquisition or involuntary resettlement; • confirmation that MSMEs have legal rights to land used for their operations; and • where land is acquired, confirmation that acquisition is undertaken only through a voluntary willing buyer–willing seller process with proper documentation. These requirements shall be reflected in the ESMS and guarantee/sub-loan agreements. 	Prior to signing guarantee agreements with PFIs and prior to MSME financing.	BoT; CGC; PFIs; MSMEs (contractual obligation)
ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources			
6.1	i. Require PFIs to ensure that MSMEs identify and assess any biodiversity risks associated with their activities, in accordance with national law, the Project ESMS, and ESS6. Where relevant, MSMEs shall include biodiversity-related mitigation measures in ESMPs or simplified risk plans.	Throughout Project implementation and prior to MSME financing.	PFIs, MSMEs, CGC and BoT
ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities			

7.1	i. Prepare, disclose, and implement an Inclusion Strategy to ensure that Indigenous Peoples (IP)/vulnerable and marginalized groups (VMGs) and other vulnerable groups can access Project benefits in an inclusive, non-discriminatory, and culturally appropriate manner. The Strategy shall identify barriers to access and propose feasible measures to remove them.	Inclusion Strategy prepared prior to Project effectiveness and implemented throughout Project implementation.	BoT
	ii. Integrate the Inclusion Strategy into the Project ESMS, including the ESMS of BoT, CGC, and PFIs, and ensure it guides screening, outreach, eligibility, and monitoring practices.	Strategy integrated into ESMS prior to disbursement of IDA funds to BoT and applied throughout implementation.	BoT, CGC and PFIs
	iii. Ensure that Traditional Local Communities (meeting ESS7 criteria) in mainland Tanzania and Zanzibar are appropriately informed of the Project and can access Project benefits in a culturally appropriate and inclusive manner, with related provisions included in the SEP.	Throughout Project implementation	BoT, CGC and PFIs
	iv. PFIs shall ensure that MSMEs prepare the required E&S instruments (e.g., ESMPs or, where applicable, ESIAs) consistent with national law, the Project ESMS, and ESS7 requirements, prior to receiving financing. These instruments shall address any risks relevant to Indigenous Peoples/VMGs, as applicable.	Prior to disbursement of funds to MSMEs.	BoT, CGC, PFIs and MSMEs
ESS8 Cultural Heritage			
8.1	i. Require PFIs to ensure that MSMEs identify and manage any risks or impacts on cultural heritage in accordance with national laws, the Project ESMS, and ESS8. Where applicable, MSMEs shall include cultural heritage protection measures in their ESMPs or simplified risk plans.	Prior to MSME financing and throughout Project implementation.	PFIs, MSMEs, CGC and BoT
ESS9 Financial Intermediaries			

9.1	i. BoT shall prepare, disclose, adopt, maintain, and implement a Project ESMS, consistent with ESS9 and acceptable to the Association, as a condition of disbursement of Funds from IDA to BoT.	ESMS to be finalized, disclosed, and adopted prior to disbursement under Component 1; thereafter maintained throughout Project implementation.	BoT
	ii. Require CGC to prepare, disclose, adopt, and implement an ESMS consistent with the Project ESMS and ESS9.	CGC ESMS to be prepared, disclosed, and approved by the Association prior to transferring any Project funds to CGC; thereafter maintained throughout Project implementation.	BoT, CGC
	iii. Require PFIs to maintain and implement ESMSs consistent with the Project ESMS and ESS9 as a condition for participating in the guarantee scheme.	PFI ESMSs to be assessed and approved by CGC and BoT prior to signing guarantee agreements; thereafter maintained throughout the Project.	BoT, CGC and PFIs
	iv. Prepare and/or update any complementary E&S instruments necessary for ESMS implementation (e.g., stakeholder engagement plan, labour management plan (LMP), templates, reporting formats), in a manner acceptable to the Association.	Prior to disbursement under Component 1 and updated as needed throughout Project implementation.	BoT; CGC
	v. Require PFIs to ensure that MSMEs prepare subproject-specific ESMPs, consistent with national law, the approved ESMS, and ESS9, prior to receiving financing.	ESMPs/SPRs prepared and approved by PFIs before signing sub-loan/sub-guarantee agreements with MSMEs.	PFIs; MSMEs; CGC
9.2	ORGANIZATIONAL CAPACITY i. CGC and PFIs shall establish and maintain adequate organizational capacity and competent E&S staff to implement their ESMS, as outlined under Action 1.2.	Throughout the Project implementation	BoT, CGC, PFIs

9.3	SENIOR MANAGEMENT REPRESENTATIVE i. CGC and PFIs shall designate a senior management representative with overall accountability for E&S performance and ESMS implementation.	Throughout the Project implementation	CGC and PFIs
9.4	CASCADING OF ESMS REQUIREMENTS BoT shall ensure that the requirements of the Project ESMS are fully cascaded to CGC, PFIs, and ultimately to MSMEs through guarantee agreements and subsidiary documentation. BoT shall obligate CGC and PFIs to operationalize ESMS processes including screening, monitoring, and reporting.	Prior to transferring Project funds to CGC and prior to signing guarantee agreements with PFIs; thereafter throughout Project implementation.	BoT, CGC, PFIs
ESS10 Stakeholder Engagement and Information Disclosure			
10.1	i. Implement the Stakeholder Engagement Plan (SEP) in a manner consistent with ESS10, including use of inclusive, culturally appropriate communication methods to reach vulnerable and marginalized groups (including IP/VMGs, women, youth, illiterate persons, and persons with disabilities).	Throughout Project implementation	BoT, CGC and PFIs
	ii. Develop and implement a Communication Plan for BoT, CGC, and PFIs, including dedicated outreach and tailored sessions for women entrepreneurs, youth, and persons with disabilities.	Communication Plan prepared prior to disbursement of funds to PFIs or MSMEs and implemented throughout the Project.	BoT; CGC; PFIs
	iii. Monitor implementation of the SEP and information disclosure activities	Quarterly throughout Project implementation	BoT; CGC; PFIs

10.2	Grievance Mechanism i. Maintain and operate an accessible Project-level grievance mechanism (GM), consistent with ESS10, to receive and facilitate resolution of concerns related to the Project. Ensure the GM is publicly available and adequately resourced.	Throughout Project implementation.	BoT, CGC, PFIs, MSMEs
	Update the grievance mechanism to incorporate measures from the Inclusion Strategy to ensure accessibility for IP/VMGs, women, youth, illiterate persons, and persons with disabilities.	Updated GM in place prior to disbursement of IDA funds to BoT and maintained throughout Project implementation.	BoT, CGC, PFIs, MSMEs
10.3	GBV-SENSITIVE GRIEVANCE MECHANISM Ensure the grievance mechanism includes safe, confidential, survivor-centered procedures for receiving and addressing GBV/SEA/SH complaints. With survivor consent, the GM shall immediately notify BoT and the Association of any GBV-related complaint.	Throughout Project implementation	BoT, CGC, PFIs, MSMEs
Capacity Building			
11.1	i. BoT shall develop an Environmental and Social training toolkit and training manuals tailored for CGC, PFIs, and MSMEs, consistent with the Project ESMS and ESSs.	Toolkit and manuals prepared prior to disbursement of IDA funds to BoT.	BoT
	ii. BoT shall deliver training to CGC and PFIs on the Project ESMS, E&S risk management, national E&S requirements, and monitoring and reporting obligations.	Initial training delivered prior to signing guarantee agreements with PFIs, and refresher sessions conducted throughout Project implementation.	BoT
	iii. BoT shall submit semi-annual capacity-building and training reports to the Association, covering training delivered to CGC, PFIs, and MSMEs.	Semi-annually throughout Project implementation.	BoT

	iv. BoT shall ensure that CGC requires PFIs to train MSMEs on the Project ESMS and applicable environmental and social requirements, proportionate to MSME capacity and sector risks. Training shall cover national regulatory compliance, ESMP preparation (as applicable), and monitoring obligations.	MSME training completed prior to providing financing/guarantees to MSMEs and maintained throughout the Project.	BoT, CGC and PFIs
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