

**Georgia: Log-In Georgia Project  
(P169698)**

**ENVIRONMENTAL AND SOCIAL  
COMMITMENT PLAN (ESCP)**

**for Negotiations  
June 2025**

1. *Open Net, a non-entrepreneurial and non-profit legal entity* (Open net) is implementing the Log in Georgia Project (the Project), under the oversight of the Ministry of Economy and Sustainable Development of Georgia and with the involvement of the Georgian National Communication Commission (ComCom), as set out in the Original and the Additional Loan Agreements. The International Bank for Reconstruction and Development (the Bank) has agreed to provide additional financing for the Project. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing for the Project referred to above.
2. *Open Net* 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 Bank. The ESCP is a part of the Agreement[s]. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement[s].
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower 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 Bank. Said E&S documents may be revised from time to time with prior written agreement by the World Bank [Bank/Association]. As provided for under the referred Agreement[s], the Borrower shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Bank and the Borrower, 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 Bank and the Borrower agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Borrower. The Borrower 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.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT</b>			
A	<b>ORGANIZATIONAL STRUCTURE</b> a. Maintain a Project Implementation Unit (PIU) with qualified staff and resources to support management of environmental, social, health and safety risks and impacts of the Project including an Environmental, Social, and Public Communications Specialist.	<i>Prior to the Effective Date.  Thereafter maintained throughout Project implementation</i>	Open Net
B	<b>CAPACITY BUILDING PLAN/MEASURES</b> Prepare and implement the following capacity building measures:  General introduction to the Bank's ESF and training of Project workers on the Labor Management Procedures, Code of Conduct, and Occupational Health and Safety.	<i>Within three months after the Effective Date.</i>	Open Net
<b>MONITORING AND REPORTING</b>			
C	<b>REGULAR REPORTING</b> Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include: <ul style="list-style-type: none"> <li>• Status of preparation and implementation of E&amp;S documents required under the ESCP.</li> <li>• Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan.</li> <li>• Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them.</li> <li>• E&amp;S performance of contractors and subcontractors as reported through contractors' and supervision consultants' reports.</li> <li>• Number and status of resolution of incidents and accidents reported under action E below.</li> </ul>	<i>Six-monthly throughout Project Implementation.  Submit each report to the Bank within a month after the end of each reporting period.</i>	Open Net
D	<b>CONTRACTORS' MONTHLY REPORTS</b> Require contractors and Supervising Consultants to provide 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 Bank.	<i>Submit monthly reports from contractors and supervision consultants to the Bank upon request</i>	Open Net
E	<b>INCIDENTS AND ACCIDENTS</b> Notify the Bank 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; dam failure; forced or child labor; displacement without due process	<i>Notify the Bank no later than 48 hours after learning of the incident or accident. Provide available details upon request.</i>	Open Net

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>(forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Bank upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank, 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.</p>	<p><i>Provide review report and Corrective Action Plan to the Bank no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.</i></p>	
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b></p> <p>Update, implement and periodically revise Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs, which specifies rules and procedures for assessing subproject-specific E&amp;S risks and for preparing subproject-specific Environmental and Social Management Plans (ESMPs).</p> <p>Prepare and implement subproject-specific ESMPs, consistent with the ESMF and relevant ESSs.</p>	<p>Update the ESMF within a month from the Effective Date and thereafter implement the ESMF throughout Project implementation.</p> <p>Prepare subproject-specific ESMPs and incorporate them into the respective bidding documents prior to launching procurement of works. Require Contractors to implement respective ESMPs throughout the contract life.</p>	Open Net
1.2	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, ESMF and site-specific ESMPs including, inter alia, Labor Management Procedures, Code of Conduct, and Chance Find Procedure into the E&amp;S specifications of the procurement documents and contracts with contractors and supervising consultants. Thereafter ensure that the contractors and supervising consultants comply and that they require their subcontractors to comply with the E&amp;S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision consultants to the Bank.</p> <p>Include ESMPs in all contracts for the provision of civil works contractors. Thereafter, ensure that contractors comply with the ESMP requirements of their respective contracts.</p>	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Provide copies of contracts to the Bank upon request.</p>	Open Net
1.3	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Bank that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	<p><i>As part of preparation of Terms of Reference for technical assistance</i></p>	Open Net

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		<i>Supervise consultants throughout implementation of their assignments</i>	
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<b>LABOR MANAGEMENT PROCEDURES</b> Update and implement Labor Management Procedures (LMP) for the Project in a manner acceptable for the World Bank and the national legislation of Georgia.	<i>Update LMP within a month from the Effective Date.  Implement LMP throughout Project implementation.</i>	<i>Open Net</i>
2.2	<b>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</b> Prepare, implement, and update as required an Occupational Health and Safety (OHS) Management Plan as part of the Employer's ESMP to assess and manage the OHS risks and impacts of the Project. Require Contractors and subcontractors to prepare and implement Contractor's OHS Management Measures or Plans in accordance with the Employer's site-specific ESMPs. Specific issues relate to working in poorly accessible remote areas, working at heights, working on road edges at risk of vehicle collisions, working with heavy machinery, etc.	<i>Adopt and implement the OHS requirements throughout Project Implementation</i>	<i>Open Net</i>
2.3	<b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b> Maintain a grievance mechanism for Project workers as described in the LMP and consistent with ESS2.	<i>Throughout Project Implementation.</i>	<i>Open Net</i>
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<b>WASTE MANAGEMENT PLAN</b> Prepare, implement and update as needed a Waste Management Plan (WMP) as part of the Employer's ESMP to manage hazardous and non-hazardous wastes consistent with ESS3 and relevant national legislation.  Specific issues related to managing of excavated material, bad batches of asphalt/concrete, packaging waste, cable-related waste and hazardous waste such as asbestos-containing debris will be included in site-specific ESMPs.  In the operation phase, in case of power outages, if maintaining consistency of internet service provision requires deployment of backup sources of energy, such as battery storage or diesel generators, (i) used batteries will be turned in to supplier as a preferred option or disposed in compliance with the Waste Management Code of Georgia and (ii) fuel efficient generators will be selected and installed outdoors or in well-ventilated premises, in the locations minimizing nuisance to communities from noise and exhaust.	<i>Prepare a WMP, include into works contracts and enforce implementation throughout conduct of civil works under the Project.</i>	<i>Open Net</i>
3.2	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Incorporate resource efficiency and pollution prevention and management measures in the site-specific ESMPs and contractual requirements of works providers.	Throughout Project implementation;	Open Net
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>TRAFFIC AND ROAD SAFETY</b> Include requirement to develop and implement Traffic Management Plans (TMPs) as per the Project ESMF into bidding documents for the provision of civil works and monitor adherence to to TMPs by Contractors. TMPs shall include provisions ensuring safety of workers operating on road shoulders and roadsides.	<i>Include requirements during preparation of bidding documents.</i> <i>Monitor implementation throughout contract life</i>	Open Net
4.2	<b>COMMUNITY HEALTH AND SAFETY</b> Include requirements for ensuring community health and safety into site-specific ESMPs and contracts for the delivery of civil works and monitor adherence to these requirements by Contractors.	<i>Include requirements into ESMPs and bidding documents during their preparation of bidding documents.</i>  <i>Monitor adherence to requirements throughout contract life</i>	Open Net
4.3	<b>SEA AND SH RISKS</b> Include in site-specific ESMPs actions to prevent and mitigate SEA/SH risks in line with ESMF and enforce their implementation. This includes but is not limited to development and adherence to Code of Conduct for all employees, SEA/SH-sensitized grievance mechanism, awareness raising of all employees and community members on SEA/SH risks and mitigation measures.	<i>Include actions during preparation of ESMPs</i>  <i>Monitor implementation of actions throughout contract life</i>	Open Net
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<b>RESETTLEMENT FRAMEWORK AND PLANS</b> Update the Resettlement Policy Framework (RPF) of the Project, consistent with ESS5.  Prepare, adopt, and implement Resettlement Action Plans (RAPs) in accordance with ESS 5 and consistent with the requirements of the RPF. Ensure that RAPs are approved by World Bank and fully implemented before carrying out the associated activities in a manner acceptable to the Bank.	<i>Update RPF within a month from the Effective Date and adhere to throughout Project implementation.</i>  <i>Implement RAPs prior to commencing respective Project activities</i>	Open Net
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
This ESS is not relevant for the Project.			
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
This ESS is not relevant for the Project.			
<b>ESS 8: CULTURAL HERITAGE</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
8.2	<p><b>CHANCE FINDS</b></p> <p>Include chance find procedure into site-specific ESMPs and bidding documents for the provision of civil works and oversee compliance by Contractors.</p>	<p><i>Include during preparation of ESMPs and bidding documents.</i></p> <p><i>Monitor adherence to procedure throughout contract life</i></p>	Open Net
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
This ESS is not relevant for the Project.			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN</b></p> <p>Update and implement a Stakeholder Engagement Plan (SEP) of the Project, consistent with ESS10, 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><i>Update SEP within one month from the Effective Date and implement throughout the Project Implementation</i></p>	Open Net
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>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.</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>	<p><i>Maintain GRM throughout the Project implementation</i></p>	Open Net
<b>INDICATORS FOR IMPLEMENTATION READINESS</b>			
<p>The following actions are indicators for implementation readiness:</p> <p>A, 1.1, 2.1, 5.1, 10.1</p>			