

SOCIALIST REPUBLIC OF VIET NAM



RENEWABLE ENERGY ACCELERATING CHANGE PROJECT (P516693)

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

SEPTEMBER 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Socialist Republic of Viet Nam (the Borrower) will implement the Renewable Energy Accelerating Change Project (the Project) in Đắk Lắk Province, Lâm Đồng Province, Đồng Nai City, Ho Chi Minh City, and Tây Ninh Province, with the involvement the National Power Transmission Corporation (EVNNPT) as the Project Implementing Entity (PIE) and Southern Projects Management Board (SPMB), as set out in the Loan Agreement and the Canada Clean Energy and Forest Climate Facility Financing Agreement (collectively, the Agreements). The International Bank for Reconstruction and Development (IBRD), acting in its own capacity, and IBRD and the International Development Association (IDA)(collectively, the “Bank”), acting as administrator of the Canada Clean Energy and Forest Climate Facility Single-Donor Trust Fund, have agreed to provide financing for the Project, as set out in the Agreements.
2. The Borrower shall, and shall cause EVNNPT to, 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 Agreements. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreements.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall, and shall cause EVNNPT to, 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 Bank. As provided under the referred Agreements, the Borrower shall, and shall cause EVNNPT to, 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 EVNNPT. The Borrower shall cause EVNNPT to 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
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	ORGANIZATIONAL STRUCTURE a. Maintain the Southern Projects Management Board (SPMB) under the National Transmission Corporation (EVNNPT) as Project Management Unit (PMU), with qualified staff and resources to support management of environmental, social, health, and safety (E&S) risks and impacts of the Project including a qualified Social Specialist who shall also serve as the SEA/SH Focal Point, a qualified Environmental Specialist, a Grievance Redress Mechanism (GRM) Focal Point, and a qualified Occupational Health and Safety (OHS) Specialist. b. The SPMB shall recruit and maintain a qualified Independent Environmental and Social Monitoring Consultant (IESMC) and a Construction Supervision Consultant (CSC) with qualified Environmental and Social practitioners, on terms of reference (TORs) acceptable to the Bank, to monitor the implementation of the E&S requirements for the Project. The SPMB shall consult the Bank and relevant agencies as necessary and implement the recommendations of the IESMC in a manner acceptable to the Bank.	a. Maintain the SPMB as PMU throughout Project implementation. Appoint the Environmental Specialist, the Social Specialist, the GRM Focal Point, and the Occupational Health and Safety (OHS) Specialist within thirty (30) days after the effective date of the Agreements (Effective Date); and thereafter maintain these positions throughout Project implementation. b. The SPMB shall hire: (i) an IESMC within three (3) months after the Effective Date; and (ii) a CSC before commencing any construction activities under the Project; and thereafter maintain these positions throughout Project implementation.	EVNNPT and SPMB
B	CAPACITY BUILDING PLAN/MEASURES Prepare and implement the capacity building plans: a. The SPMB shall be responsible for mobilizing the IESMC to conduct training for SPMB staff, stakeholders, communities, and Project workers on: (i) stakeholder mapping and engagement; (ii) the Bank's Environmental and Social Framework (ESF); (iii) implementation of the Ethnic Minority Development Plan (EMDP), Environmental and Social Management Plan (ESMP), Labor Management Procedures (LMP), Resettlement Plan (RP), and Stakeholder Engagement Plan (SEP); (iv) the roles and responsibilities of each entity in the preparation and implementation of the ESF instruments; (v) the grievance redress mechanism; (vi) environmental and social monitoring and reporting; (vii) labor management procedures and Occupational and Community Health and Safety arrangements; (viii) emergency preparedness and response; (ix) Gender-Based Violence and implementation of SEA/SH Action Plan. b. SPMB staff and related stakeholders to receive training on ESS obligations applicable to the Terms of Reference (TORs) and bidding documents under the Project, including, inter alia, the requirements under ESMP and LMP; and on how to incorporate these obligations into the Project's TORs and bidding documents.	a. Implement the capacity building plans within three (3) months after the Effective Date and thereafter undertake refresher training on a quarterly basis throughout Project implementation. IESMC to conduct training for relevant stakeholders within thirty (30) days after signing the construction contracts. b. Complete the training on ESS obligations applicable to Terms of Reference (TORs) and bidding documents under the Project prior to the initiation of the first bidding process.	EVNNPT and SPMB

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
C	REGULAR REPORTING 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: • Status of preparation and implementation of E&S documents required under the ESCP. • Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. • Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. • E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports. • Number and status of resolution of incidents and accidents reported under action E below. Detailed information on monitoring and reporting will be provided in the E&S documents of the Project, including the EMDP, ESIA, LMP, RP, and SEP.	Submit the quarterly progress and monitoring reports to the Bank throughout Project implementation, commencing after the Effective Date. Submit each report to the Bank no later than seven (7) days after the end of each respective reporting period.	EVNNPT and SPMB
D	CONTRACTORS' MONTHLY REPORTS a. Require contractors and Construction Supervision Consultant (CSC) 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. b. Require the Independent Environmental and Social Monitoring Consultant (IESMC) to provide a quarterly environmental monitoring report and a biannually social monitoring report.	a. Submit the monthly reports by including them as annexes to the IESMC's quarterly environmental monitoring report for the corresponding reporting period, to be submitted to the Bank pursuant to Action D (b) below; and submit monthly reports upon the Bank's request throughout Project implementation. b. Submit quarterly environmental monitoring reports and biannual social monitoring reports throughout Project implementation. Submit each report to the Bank no later than seven (7) days after the end of each respective reporting period.	EVNNPT and SPMB
E	INCIDENTS AND ACCIDENTS a. 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,	a. Notify the Bank no later than forty-eight (48) hours after learning of the incident or accident. Provide available details upon request.	EVNNPT and SPMB

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	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 (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. b. 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.	b. Provide review report and Corrective Action Plan to the Bank no later than ten (10) days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.	
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS Prepare, update, adopt, disclose, and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for the Project, consistent with the relevant ESSs.	- The draft ESIA and ESMP have been prepared and will be disclosed prior to project appraisal. The ESIA and ESMP will be finalized, adopted, and re-disclosed within thirty (30) days after the Effective Date. - Where necessary, update, adopt, and re-disclose the ESIA and ESMP before launching the bidding process for any Project activity that requires update/adoption/re-disclosure; and thereafter implement the updated ESIA and ESMP throughout Project implementation.	EVNNPT and SPMB
1.2	MANAGEMENT OF CONTRACTORS a. Incorporate the relevant aspects of the ESCP, including, inter alia, ESMP, site-specific plans, GRM, the Labor Management Procedures, and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Bank. b. Each Contractor shall be required to develop and implement a Contractor's ESMP (C-ESMP) based on the final ESMP.	- As part of the preparation of procurement documents and respective contracts. - Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Bank upon request. - SPMB shall clear the C-ESMP prior to the commencement of construction under the respective contract.	EVNNPT and SPMB

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.3	TECHNICAL ASSISTANCE Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project, including, inter alia, ESIA and RP 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.	Throughout Project implementation.	EVNNPT and SPMB
1.4	USE OF BORROWER'S ENVIRONMENTAL AND SOCIAL FRAMEWORK a. Ensure that the labor management and working conditions of Project workers, any land acquisition, restrictions on land use and physical and/or economic displacement, and stakeholder engagement, information disclosure and grievance management under the Project are consistent with this ESCP and with the Borrower's relevant policy, legal and institutional framework, including its national, departmental, and local implementing institutions, and the applicable laws, regulations, procedures, and implementation capacity. Additional requirements shall be set out in the Labor Management Procedure, Resettlement Plan and Stakeholder Engagement Plan prepared for the Project to ensure full alignment with ESS2, ESS5 and ESS10, respectively. b. In the event of inconsistency between the provisions of the ESSs and the Borrower's E&S Framework, the provisions of the ESSs shall prevail. c. Promptly notify the Bank of any changes to the Borrower's E&S Framework that may materially adversely affect the Borrower's ability to manage the E&S risks and impacts of the Project in line with the ESSs and the immediate measures taken or that are planned to be taken to address said changes and the ensuing potential risks and impacts of the Project. If, in the opinion of the Bank, such changes adversely affect relevant ESHS risk management aspects of the Project, the Borrower shall agree to implement measures and actions to address them in a manner acceptable to the Bank. The ESCP shall be updated to reflect such agreed actions.	• (a)-(b) Throughout Project implementation. • (c) Notify the Bank immediately after taking notice of the change to the Borrower E&S Framework. Subsequent actions, if requested by the Bank, shall be reflected in an updated ESCP as indicated in paragraph 4 of the Initial Section of this ESCP.	

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Prepare, update, adopt, and implement the Labor Management Procedures (LMP) for the Project, 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 CSC, consistent with the Borrower's E&S Framework and ESS2, as specified in Action 1.4 above.	- The draft LMP has been prepared and will be publicly disclosed prior to the Project appraisal. The LMP will be finalized, adopted, and re-disclosed within thirty (30) days after the Effective Date. - Where necessary, update, and redisclose the LMP prior to engaging Project workers; and implement the LMP, and any subsequent updates thereto, throughout Project implementation.	EVNNPT and SPMB
2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN a. Prepare and implement an OHS Management Plan to assess and manage the OHS risks and impacts of the Project. Require contractors and subcontractors to prepare and implement OHS Management Measures or Plan in accordance with the ESIA and ESMP. b. Adopt and implement an UXO risk management protocol in the C-ESMP where civil works will be carried out. The SPMB shall ensure that the required budget for UXO surveys and clearance is in place.	a. Prepare an OHS Management Plan as an addition to the Contractor's ESMP (for each contract) prior to the commencement of activities under the respective contract and thereafter implement the OHS plan throughout Project implementation. b. Arrange for UXO detection or clearance or secure all UXO Clearance-related certificates and documents from the appointed authority for the specified Project site prior to commencement of any related construction or excavation activities. Report to the Bank upon receipt of the certificates and report in the regular reporting.	EVNNPT and SPMB
2.3	GRIEVANCE MECHANISM FOR PROJECT WORKERS Maintain and operate a grievance mechanism for Project workers, as described in the LMP and consistent with the Borrower's E&S Framework and ESS2, as specified in Action 1.4 above.	Maintain and operate a grievance mechanism prior to engaging Project workers and thereafter throughout Project implementation.	EVNNPT and SPMB

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Prepare and implement a Waste Management Plan (WMP), as part of the ESMP prepared for the Project to manage hazardous and non-hazardous waste, consistent with ESS3.	Prepare and adopt the WMP before commencement of the Project activities and thereafter implement the WMP throughout Project implementation.	EVNNPT and SPMB
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the ESMP.	EVNNPT and SPMB
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the ESMP.	EVNNPT and SPMB
4.2	Prepare a Traffic Management Plan and obtain approval of the plan from relevant authorities.	Prior to the commencement of road construction works, and thereafter implement the approved Traffic Management Plan throughout the construction phase.	EVNNPT and SPMB
4.3	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers, risks of labor influx, response to emergency situations, and include mitigation measures in the ESMP and LMP prepared in accordance with the ESS4.	Same timeframe as for the preparation and implementation of the ESMP and LMP.	EVNNPT and SPMB
4.4	SEA AND SH RISKS ACTION PLAN Prepare, adopt, implement and monitor a SEA/SH Action Plan as part of the ESIA and the ESMP, and mobilize the CSC to monitor the daily implementation of these requirements for each civil works package and report findings in the CSC's monthly monitoring reports on E&S performance.	- Prepare and disclose the draft SEA/SH Action Plan as part of the draft ESIA and ESMP prior to Project negotiations. - Adopt the final SEA/SH Action Plan before launching the first bidding process for civil works.	EVNNPT and SPMB

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		- Designate the SEA/SH Focal Point no later than thirty (30) days after the Effective Date and, in all cases, before mobilization of any civil works contractor. - Incorporate the applicable SEA/SH requirements into procurement documents and contracts before issuance of the respective bidding documents and thereafter implement and monitor the SEA/SH Action Plan throughout Project implementation.	
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT PLAN Prepare and implement a Resettlement Plan (RP) under the Project consistent with the Borrower's E&S Framework and ESS5, as specified in Action 1.4 above.	Prepare, consult upon, and disclose an appraisal-stage draft RP prior to Project appraisal. Finalize, adopt, and redisclose the RP, based on the final detailed design and updated census, asset inventory, socioeconomic information, and replacement cost assessment, before commencement of any land acquisition or related civil works. Implement the RP, and any subsequent updates thereto, throughout Project implementation.	EVNNPT and SPMB
5.2	LAND ACCESS, PACKAGE-SPECIFIC VERIFICATION, AND MULTI-PROVINCE COORDINATION The Borrower shall cause EVNNPT/SPMB to coordinate with the competent authorities in all Project provinces and ensure that no civil works requiring access to land commence in any section or construction package until applicable compensation at replacement cost, relocation assistance, livelihood restoration, and other resettlement measures for that section have been completed in accordance with the approved RP and ESS5. Before commencement of such works, EVNNPT/SPMB shall obtain section- or package-specific independent verification from the IESMC and provide the verification findings to the Bank. Implementation responsibility and authorization to provide land access shall remain with EVNNPT/SPMB and the competent authorities.	Before commencement of civil works requiring access to land in each relevant section or construction package. Submit the IESMC verification findings to the Bank before commencement of the corresponding works and report implementation status through the regular E&S monitoring reports.	EVNNPT and SPMB
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
6.1	BIODIVERSITY RISKS AND IMPACTS Prepare and implement measures and actions to assess and manage risks and impacts on biodiversity, as part of the ESMP for the Project, and consistent with ESS6.	Same timeframe as for the preparation and implementation of the ESMP.	EVNNPT and SPMB
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	ETHNIC MINORITY DEVELOPMENT PLAN Prepare and implement an Ethnic Minority Development Plan (EMDP) under the Project, consistent with ESS7. Complete the Social Assessment and document the determination of whether any Project activity triggers the circumstances requiring Free, Prior and Informed Consent (FPIC) under ESS7. Where FPIC is required, complete and document the FPIC process in a manner acceptable to the Bank before commencement of the relevant activity or works in the affected area. If consent cannot be obtained, redesign, modify, or exclude the relevant activity so that the impacts requiring FPIC do not proceed.	The EMDP has been prepared and publicly disclosed prior to Project appraisal. Complete the Social Assessment and the FPIC determination before negotiations. Where necessary and where FPIC is required, update and redisclose the EMDP and complete and document the FPIC process prior to carrying out the relevant activities. Implement the EMDP, and any subsequent updates thereto, throughout Project implementation.	EVNNPT and SPMB
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Assess the impacts on cultural heritage in the Project area and include and implement measures, as part of the ESIA and ESMP, consistent with ESS8.	Same timeframe as for the preparation and implementation of the ESMP.	EVNNPT and SPMB
8.2	CHANCE FINDS Develop and implement the chance finds procedures, as part of the ESMP of the Project.	Same timeframe as for the preparation and implementation of the ESMP.	EVNNPT and SPMB
ESS 9: FINANCIAL INTERMEDIARIES			
	No financial intermediaries are expected to be involved in the Project. This standard is not relevant for the Project.		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN Prepare and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with the Borrower's E&S Framework and ESS10 as specified in Action 1.4 above, 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.	- The SEP has been prepared and publicly disclosed prior to the Project appraisal. Where necessary, update and redisclose the SEP. - Implement the SEP, and any subsequent thereto, throughout Project implementation.	EVNNPT and SPMB
10.2	PROJECT GRIEVANCE MECHANISM a. Publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, in a manner consistent with the Borrower's E&S Framework and ESS10, as specified in Action 1.4 above. b. 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.	Publicize the grievance mechanism within thirty (30) days after the Effective Date and thereafter maintain and operate the mechanism throughout Project implementation.	EVNNPT and SPMB
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness:			
S/N	Indicator		
A	Staff described in Action A.a are appointed within thirty (30) days after the Effective Date.		
A	IESMC is hired and mobilized within three (3) months after the Effective Date.		
B	Trainings for EVNNPT/SPMB's staff and relevant stakeholders are conducted before implementation of the Project activities.		
B	Trainings are conducted by IESMC within thirty (30) days after signing construction contracts.		
1.1	ESIA and ESMP are prepared, finalized, adopted and disclosed on both Bank's and EVNNPT/SPMB's websites within thirty (30) days after the Effective Date.		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.1	The LMP is adopted, and a workers' grievance mechanism is operational, and communicated to all Project workers before they are engaged, and thereafter maintained throughout Project implementation.		
5.1	The updated RP, including completed RCS results and any required replacement-cost gap-filling plan, is adopted, disclosed, and implemented before land acquisition, displacement, restriction on land use, or relevant works.		
5.1	Counterpart budget is timely and sufficiently allocated for implementation of land acquisition and resettlement before taking possession of the land and related assets.		
5.2	IESMC section- or package-specific verification confirms completion of applicable ESS5 measures before civil works requiring access to land commence, and verification findings are provided to the Bank.		
7.1	The Social Assessment and FPIC screening for all Project activities affecting Ethnic Minority communities is completed and documented in a manner acceptable to the Bank. Where FPIC is required under ESS7, the FPIC process is completed and documented before commencement of the relevant activity.		
10.2	GRM is publicized, maintained, and operated within thirty (30) days after Effective Date.		