

# **Philippines Multisectoral Nutrition Project (P175943)**

## **ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)**

**Republic O'f The Philippines  
Department of Health (DOH), and  
Department of Social Welfare and Development (DSWD)**

**October 2021**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Philippines (hereinafter referred to as the Borrower), through Department of Health (DoH) and Department of Social Welfare and Development (DSWD) shall implement the Philippines Multisectoral Nutrition Project (*the Project*), with the involvement of the following partner agencies/units: Department of Interior and Local Government, Department of Agriculture, Department of Science and Technology-Food and Nutrition Research Institute, National Nutrition Council and Office of the Cabinet Secretariat. The International Bank for Reconstruction and Development (*hereinafter referred to as the Bank*) has agreed to provide financing for the Project.
2. The Borrower shall implement material measures and actions so that the Project is implemented in accordance with 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 Borrower shall also comply with the provisions of any other Environmental and Social (E&S) documents required under the Environmental and Social Framework (ESF) and referred to in this ESCP, such as Environmental and Social Management Framework (ESMF), Labor Management Procedures (LMP), Environmental Codes of Practice (ECOP), Environmental and Social Management Plans (ESMP), Resettlement Policy Framework (RPF), and Stakeholder Engagement Plan (SEP), and the timelines specified in those E&S documents.
4. The Borrower is responsible for compliance with all the requirements of the ESCP even when the implementation of specific measures and actions is conducted by DoH/ DSWD or the other agencies or units referenced in 1. above.
5. The Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Bank by the Borrower as required by the ESCP and the conditions of the legal agreement, and the Bank shall monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Bank and the Borrower, 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 Borrower shall agree to the changes with the Bank and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Bank and the Borrower. The Borrower 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 Borrower shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&amp;S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s) and grievances log.</p> <p>In addition, the monitoring reports shall include (i) design modification or change in scope of subprojects brought to Bank notice, (ii) assessment of changes and updating/addendum to ESA/ECOP/ESMP, (iii) site observations on Contractor’s performance on Environmental Social Health and Safety (ESHS) and other plans required under the ESMP, (iv) summary of stakeholder engagement activities as required under the SEP, (v) progress of E&amp;S staffing within DoH NPMO and DSWD NPMO, regional and provincial as well as other implementation partners/agencies, (vi) capacity building /training activities undertaken for different project functionaries, and (vii) corrective Actions and planned E&amp;S activities for next quarter.</p> <p>Establish and maintain a Memorandum of Agreement (MOA) as a mechanism to report to the Bank and arrangements with other agencies (DOH, DSWD, DA, LGUs, and others) to support the implementation of the project at national, regional and provincial level.</p> <p>The MOA shall include minimum E&amp;S requirements, consistent with the E&amp;S instruments and satisfactory to the Bank.</p>	<p>Quarterly Progress Reports shall be submitted to the Bank on an agreed format not later than twenty (20) days after the end of each quarter. The reporting format will be agreed by First Implementation Support Mission.</p> <p>The MOA shall be presented to the Bank no later than ninety (90) days after the Effective Date and maintained throughout project implementation. Draft MOA to be shared with the Bank for review and inputs prior to signing of DOH, DSWD, and LGU</p>	<p>DSWD during year 1 of implementation and to be revised for year 2 and throughout project implementation.</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
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 is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, any COVID-19 outbreak in the Project and subproject areas. Provide sufficient detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address future recurrence of such incident/accidents, and any information provided by any contractor and supervising entity, as appropriate.</p> <p>Subsequently, as per the Bank’s request, prepare a root cause analysis report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Report incident or accident to the Bank no later than forty-eight (48) hours after learning of the incident or accident.</p> <p>Provide investigation report (to conform to Safeguards Incident Reporting Toolkit (SIRT) in case of accidents and fatalities) Action taken status to be incorporated in SIRT submitted within a period of 7 days from the incident</p>	<p>DoH and DSWD – National/ Regional/ Provincial Project Management Offices; MPMOs</p>

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<p><b>C</b>    <b>CONTRACTORS MONTHLY REPORTS</b></p> <p>The scale and duration of contracts/ works under the Project are small and the contractors shall be engaged locally where possible. DoH and DSWD Project teams shall assess, review and report the progress of E&amp;S management activities of contractors on a monthly basis using a checklist that is satisfactory to the Bank. The checklist shall include:</p> <ul style="list-style-type: none"> <li>• Contractor’s ECOPs/ESMP implementation work plan and review summary of implementation progress by DoH/DSWD or its agency</li> <li>• Implementation of Contractor’s ECOP/ESMP and related plans</li> <li>• Status of Compliance with E&amp;S statutory requirements (including consents, licenses, insurance, etc.)</li> <li>• Status on actions indicated in the Labor Management Procedure</li> <li>• ESHS incidents &amp; supervision</li> <li>• Usage of Personal Protective Equipment (PPE) such as hard hats, safety shoes and safety vests by workers</li> <li>• Safety at work sites like providing traffic signage, barriers/delineator, management of traffic, drainage and pliable road surface etc.</li> <li>• Training conducted, and workers participation (submit reports with statistics of training and worker’s participation)</li> <li>• Functioning of GRM relating to labor aspects, including summary details of Workers grievances</li> <li>• Community grievances</li> <li>• Corrective Actions and planned E&amp;S activities for next month</li> </ul>	<p>Checklist and monitoring instrument to be agreed within 3 months of the Effective Date .</p> <p>Quarterly progress and monitoring reports would be prepared and submitted to the Bank, or more frequently upon request by the Bank.</p>	<p>Contractors to facilitate progress review monitoring DoH and DSWD</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain an organizational structure with qualified staff and resources to support management of E&amp;S risks and the implementation of the E&amp;S instruments, including 2 E&amp;S officers (ESO) (1 Social and 1 for Environment) in the National Project Management Office (NPMO) of DoH, and 2 ESOs (1 Social and 1 for Environment) in the NPMO of DSWD.</p>	No later than sixty (60) days after the Effective Date and maintained throughout project implementation.	DoH and DSWD - NPMOs, RPMOs
1.2	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b></p> <p>Update, adopt, and implement the ESMF dated October 2021 that has been prepared for the Project, in a manner consistent with the ESS and acceptable to the Bank.</p> <p>Undertake detailed assessment and consultations of E&amp;S risks as required by the ESMF prepared for the Project, and as needed prepare, disclose and implement the relevant E&amp;S instruments based on the assessments, and propose additional mitigation measures to be incorporated into the ESMF, RPF, and SEP. Submit assessment report, E&amp;S documents and revised ESMF, RPF, and SEP, as needed, for Bank approval.</p>	<p>Throughout project implementation</p> <p>Throughout the project implementation</p>	DoH and DSWD
1.3	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>Screen any proposed subproject in accordance with the screening checklist of Environmental and Social Management Framework (ESMF) prepared for the Project, and, thereafter, draft, disclose, consult with stakeholders, finalize through incorporation of relevant feedback, adopt, and implement ECOP/ESMPs and/or applicable E&amp;S instruments, as appropriate.</p> <p>Develop and adopt a Field Guide to implement community-based block grants under Component 2 that would be part of the POM.</p>	<p>Throughout Project Implementation; prior to commencement for each subproject</p> <p>Within 90 days of project effectiveness</p>	DoH and DSWD EMNC
	Ensure that applicable ECOP/ ESMP is added to any bidding documents and contract for designing, building, and/or supervision of project involving civil works	Throughout Project Implementation	DoH and DSWD EMNC
	Where applicable develop and implement site-specific Resettlement Action Plans (RAP) in line with the Resettlement Policy Framework (RPF), approved by the Project.	Throughout Project implementation, and prior to starting any civil works on the respective site.	DoH and DSWD EMNC

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	Terms of Reference (TORs) and outputs of technical assistance (TA) activities under the Project are to be submitted for review and no-objection by the Bank so that the advice and other support provided is consistent with ESSs 1-10 as relevant.	TORs and outputs for TA activities shall be submitted to the Bank for its review and no-objection prior to their approval	DoH and DSWD
1.4	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including the relevant E&amp;S documents and/or plans, and the LMP, and GRM into the ESHS specifications of the procurement documents with the contractors.</p> <p>Performance monitoring: Monitor the performance of the contractors to ensure that they comply with the environmental and social requirements of their respective contracts.</p>	<p>Prior to the preparation of Project/Subproject procurement documents.</p> <p>Supervise performance and report on a quarterly basis and throughout Project/Subproject implementation.</p>	DoH and DSWD – NPMOs, RPMOs EMNC
1.5	<p><b>PERMITS, CONSENTS AND AUTHORIZATIONS</b></p> <p>DoH and DSWD, in collaboration with the DENR Environmental Management Bureau (EMB), EMNC, by following the E&amp;S screening mechanism under ESMF, shall prepare environmental assessment documents to support the application of Environmental Compliance Certificates (ECCs) or Certificate of Non-Coverage for each subproject to be funded for implementation.</p> <p>Obtain or assist in obtaining permits, consents and authorizations from relevant authorities for smooth functioning and compliance of contractors and other stakeholders as per applicable laws. Ensure on-going compliance.</p>	<p>Prior to the implementation of the identified Subprojects and on an on-going basis for new subprojects identified during implementation.</p> <p>Prior to mobilization of Contractors and monitor compliance throughout project implementation.</p>	DoH and DSWD EMNC Contractors

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<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Update, adopt, and implement the Labor Management Procedures (LMP), for the Project and sub-projects, including through, inter alia, occupational, health and safety measures (including personal protective equipment, and emergency preparedness and response measures), setting out grievance mechanisms for Project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms if any.</p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p> <p>Implement the Code of Conduct and grievance mechanism which is included in the ESMF and LMP.</p>	<p>Implement the LMP throughout project implementation. Update the LMP when needed as recommended in bi-annual E&amp;S reviews, mid-term review or Bank supervision missions.</p> <p>Establish the Grievance Mechanism before the engagement of Project workers and maintain, operate, monitor, document and update as required the Grievance Mechanism throughout Project implementation.</p> <p>Implement the Code of Conduct and make available GM throughout project implementation.</p>	<p>DoH and DSWD – NPMOs, RPMOs, with Contractors/ Sub-contractors and their Primary Suppliers</p>
	<p>Submit for Bank’s approval civil works contractor(s) or subcontractor (s)’, if any, Labor Management Procedure (C-LMP) and cause Contractor(s) and subcontractor(s) to adhere to C-LMP.</p>	<p>Submit within two months from contract signing. Enforcement throughout Project implementation</p>	<p>DoH and DSWD Contractors/ Sub Contractors</p>
	<p>Conduct awareness raising for local authorities, and regular monitoring, to ensure that no unpaid, forced, or child labor is used on any activity related to Project implementation</p>	<p>Throughout Project Implementation</p>	<p>DoH and DSWD Contractors/ Sub Contractors EMNC</p>
2.2	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>DoH and DSWD to cause Contractor to develop and implement the ECOP of OHS plan in compliance with ESMF/ESMP to maintain safe working environment and workplace. The OHS Plan shall include emergency preparedness and response plan; training of project workers and remedies for occupational injuries, accidents, fatalities, and disability and shall follow the General Environment Health and Safety Guidelines (EHSG)</p>	<p>Throughout Project Implementation</p>	<p>DoH and DSWD Contractors EMNC Subproject beneficiaries</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	Monitor and report the performance of Contractor(s) to ensure the implementation of OHS measures as detailed in C-LMP. Project supervision activities regarding OHS shall be done in accordance with the detailed Checklist, included in the ESMF and LMP	Throughout Project Implementation, Submit monitoring reports as part of QPRs to Bank	DoH and DSWD Contractors EMNC Subproject beneficiaries
2.3	<b>PROJECT WORKERS TRAINING</b> DoH and DSWD to cause Contractor to deliver training of Contracted Workers to raise awareness about their contractual rights and obligations.	At minimum once during the duration of contract, and prior to start of works	DoH and DSWD Contractors EMNC Subproject beneficiaries
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b> In accordance with the ESMF and E&S documents, undertake threshold analysis as per Annex A of the DENR-EMB Memorandum Circular 005-14 and prepare individual environmental assessment documents (of either an Environmental Impact Statement for Initial Environmental Examination (IEE) Checklist for ECC acquisition under the Philippine Environmental Impact Statement System (PEISS), or Project Description (PD) for the acquisition of a Certificate of Non-coverage (CNC) and facilitate awareness raising and access to training for beneficiaries, on resource efficiency and pollution prevention and control	Throughout project implementation and prior to implementation of individual subprojects.	DoH and DSWD EMNC Barangay Nutrition Committees Community Volunteers
3.2	For all subproject activities, assess impacts (through screening, ESA) from waste generation (including hazardous waste), pollution emissions and discharges, including GHG emissions where likely to be significant, and prepare and implement proportionate mitigation measures in accordance with ESMPs and ESS3.	Throughout project implementation. Assessments and ESMPs to be prepared prior to bids	
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>COMMUNITY HEALTH AND SAFETY</b> Prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities (including risks related to Covid-19, the behavior of the project workers, labor influx, increased traffic, increased social interactions between project workers and communities and increased construction activities etc.), incorporate these measures in the ECOP on Community Health and Safety Plans, consistent with the E&S documents and in a manner acceptable to the Bank. Ensure the Contractor(s) raises awareness of workers' on risks related to and measures for mitigation of impacts on local communities	Throughout Project implementation	DoH and DSWD EMNC Barangay Nutrition Committees Community Volunteers

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4.2	<p><b>GBV AND SEA RISKS</b></p> <p>Consistent with the E&amp;S instruments and in a manner acceptable to the Bank, include actions to prevent and mitigate risks of sexual exploitation and abuse and sexual harassment (SEA/SH) in site-specific ESMPs/ECOPs and enforce their implementation. This includes but is not limited to development, implementation and adherence to Code of Conduct for all employees, GBV-sensitized grievance mechanism, awareness raising of all employees and community members on GBV risks and mitigation measures</p>	<p>Upon contract signing by contractors prior to commencement of works; Enforcement throughout Project implementation</p>	<p>DoH and DSWD Contractors EMNC Subproject beneficiaries</p>
4.3	<p><b>PEST MANAGEMENT</b></p> <p>Screen subprojects for the need of purchase/handling of pesticides and if relevant, Prepare and implement ECOP on Pest Management (PM).</p> <ul style="list-style-type: none"> <li>• Through DA provide specialized trainings on integrated crop pest management to the project beneficiaries, including OHS in farm management.</li> <li>• Subproject beneficiaries to be trained on Integrated Pest Management in coordination with the Municipal Agricultural Office (MAO) or the regional agricultural office. The training to cover chemical handling, dose calculation, storage and disposal of spent pesticide containers and expired chemicals.</li> <li>• Encourage subproject beneficiaries to use organic fertilizers.</li> </ul>	<p>Develop ECOP on PM – prior to commencement of works.</p> <p>Oversee ECOP on PM implementation – throughout subproject life.</p> <p>Throughout the subproject life</p> <p>Throughout subproject life.</p>	<p>DoH and DSWD DA, MAO Contractors EMNC Subproject beneficiaries</p>
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<p><b>RESETTLEMENT PLANS</b></p> <p>Prepare, adopt, and implement resettlement plans (RAPs), <b>if required</b>, in accordance with ESS 5 and consistent with the requirements of the Project Resettlement Policy Framework (RPF), and thereafter adopt and implement the respective RAPs before carrying out the associated activities, in a manner acceptable to the Bank</p>	<p>Prepared by subproject proponents, <b>if required</b> and Implemented prior to commencing respective Project activities</p>	<p>DoH and DSWD – NPMOs, RPMOs</p>
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
	<p>This ESS is not applicable to the Project</p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	<p><b>INDIGENOUS PEOPLES PLAN</b></p> <p>The Project shall integrate IPs as part of the core design and a cross-cutting theme of the Project, and shall monitor support and measure equitable access to Project benefits through indicators.</p> <p>Prepare and implement an information system benchmark assessment of indigenous peoples and ethnicity data across participating institutions and LGUs to systematically improve tracking performance among indigenous communities.</p> <p>Prepare an ethnographic assessment about perceptions of health and nutrition services among target communities and indigenous peoples to develop and implement a set of Social and Behavioral Change Communication (SBCCs).</p>	<p>Report on the IP indicators and activities on a quarterly basis and throughout the Project Cycle</p> <p>Within 9 months following project effectiveness.</p> <p>Withihn 9 months following project effectiveness.</p>	<p>DoH and DSWD</p> <p>DoH and DSWD</p>
<b>ESS 8: CULTURAL HERITAGE</b>			
	This ESS is not relevant to the Project		
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
	This ESS is not relevant to the Project		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b></p> <p>Update, adopt, and implement Stakeholder Engagement Plan (SEP). Updates to address stakeholder engagement based on COVID 19 and post COVID 19 protocols.</p>	<p>Throughout project implementation. Update as recommended in bi-annual ESF reviews, mid-term review or Bank supervision.</p>	<p>DOH and DSWD – NPMOs, RPMOs</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>Update, adopt, maintain, and operate a grievance mechanism, as described in the SEP. An accessible grievance mechanism shall be established, publicized, maintained and operated 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 also receive, register, and address concerns and grievances related to, sexual exploitation and abuse, sexual harassment in a safe and confidential manner, including through the referral of survivors to gender-based violence service providers.</p>	<p>Functional GRM shall be ready by the Effective Date and maintained and operated throughout Project implementation.</p> <p>GRM ready by the Effective Date and throughout Project maintained and operated implementation.</p>	<p>DoH and DSWD – NPMPOs, RPMOs</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>CAPACITY SUPPORT (TRAINING)</b>			
CS1	<p>Orientation/sensitization training to targeted groups about relevant topics</p> <p>ESF trainings to ESS focal persons at NPMOs, RPMOs, EMNCs, CVs, BNCs, Local authorities, Community members on topics such as, inter alia,</p> <ul style="list-style-type: none"> <li>• World Bank Environmental and Social Framework and ESS Standards and Project level mitigation instruments</li> <li>• Environmental Codes of Practice</li> <li>• Subproject ESA/ESMP preparation;</li> <li>• Consultant Procurement and Contract Management including Guidelines on environmental and social conditions in the BOQ/contract documents</li> <li>• Management of Construction Impacts particularly in the context of Covid-19 pandemic.</li> <li>• Stakeholder mapping and engagement</li> <li>• Labor management procedures</li> <li>• Community health &amp; safety</li> <li>• Involuntary resettlement and land acquisition</li> <li>• Grievance redress mechanism</li> <li>• Gender and Development (GAD)</li> <li>• Indigenous peoples (where applicable) online/digital facilitation skills (where applicable)</li> <li>• Supervision, monitoring and reporting of E&amp;S performance</li> <li>• Indigenous Culture Sensitivity Training</li> </ul>	<p>Throughout Project implementation.</p> <p>The respective staff shall receive the training upon hiring and before start working on the Project and throughout project implementation to be conducted bi-annually or as needed depending on project implementation.</p>	<p>DoH and DSWD – NPMOs, RPMOs</p>
CS2	<p>Training for Project workers on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations, community health and safety including SEA/SH.</p>	<p>From loan effectiveness</p> <p>The respective staff shall receive the training upon hiring and before start working on the Project and throughout implementation. All field workers shall receive training before field work commences.</p>	<p>EMNC Contractors</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
CS3	Facilitate subproject beneficiaries to training on Environmental and Social Management of subprojects-screening, E&S plans (ECOPs/ESMPs); RPF and RAPs if needed, Project Evaluation and Monitoring	Throughout project implementation	RPMOs