

**The Republic of The Gambia
Ministry of Health**

THE GAMBIA ESSENTIAL HEALTH SERVICES STRENGTHENING PROJECT (P173287)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

4 August 2020

CONFIDENTIAL

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of The Gambia will implement THE GAMBIA ESSENTIAL HEALTH SERVICES STRENGTHENING PROJECT (P173287) (the **Project**), with the involvement of the following ministries/agencies/units: Ministry of Health (MOH). The International Bank for Reconstruction and Development and/or International Development Association (the **Association**) has agreed to provide financing for the Project.
2. The Republic of The Gambia will 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, specific documents or plans, as well as the timing for each of these.
3. The Republic of The Gambia will also comply with the provisions of the following environment and social (E&S) documents required under the Environment and Social Framework (ESF) and referred to in this ESCP: Environmental and Social Management Framework (ESMF), Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), Health Care Waste Management Plan (HCWMP) and the timelines specified in those E&S documents.
4. The Republic of The Gambia is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency, or unit referenced in 1. above.
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by the Republic of The Gambia as required by the ESCP and the conditions of the legal agreement. The Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. The project will have positive impacts on improving the utilization and quality of essential health services. However, the project could also cause environmental and social risks, clustered around the civil works, the generation of healthcare waste and the introduction of electronic medical records and electronic civil registration and vital statistics system which will require data privacy and protection. Five Environmental and Social Standards have been triggered, for which appropriate instruments will be developed before civil works commences. The overall risk classification is moderate.
7. As agreed by the Association and the Republic of The Gambia, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances, or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the Republic of The Gambia 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 and the Recipient. The Recipient will promptly disclose the updated ESCP.
8. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Republic of The Gambia 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
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING: Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project as described in the ESMF. This shall include the following elements: stakeholder engagement activities, functioning of the grievance mechanism(s), and supervision of each hospital construction as required in each hospital ESMP.</p>	Quarterly reports from the MOH to the WBG	MOH, the Republic of The Gambia, Program Coordination Unit (PCU)
B	<p>INCIDENTS AND ACCIDENTS: Promptly notify the Association of any incident or accident related to the Project. Provide initial report within 48 hours describing the incident and actions taken. Subsequently prepare a detailed report on the incident or accident and propose any measures to prevent its recurrence.</p>	Notify the WBG TTL within 48 hours after learning of the incident or accident with an initial report. A detailed report will be submitted within 30 days.	MOH, the Republic of The Gambia (PCU)
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE: The MOH PCU for this Project was established for the recently approved MOH COVID-19 Preparedness and Response project. The PCU Senior Operations Officer will ensure all environmental and social instruments are implemented and complied with, oversee coordination with all appropriate authorities and contractors and incorporate E&S issues and results in Project monitoring, evaluation and reporting. Key support will also be provided by the MOH Environmental Health Program Manager and Health Communications Manager, and a MOH Environmental and Social consultancy firm that prepares all ESMP documents and oversees all construction.</p>	Throughout project implementation	MOH, the Republic of The Gambia (PCU)

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS:</p> <ol style="list-style-type: none"> a. Develop an ESMF to assess the environmental and social risks and impacts of Project activities with mitigation measures in accordance with ESS1. The ESMF incorporates the Health Care Waste Management Plan and its Standard Operating Procedures (SOPs). b. Prepare, disclose, and implement ESMPs for the five Hospital construction subprojects. c. Incorporate the relevant aspects of this ESCP, including, inter alia, any ESMPs or other instruments, ESS2 requirements, and any other required ESHS measures, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply with the ESHS specifications of their respective contracts. 	<ol style="list-style-type: none"> a. ESMF finalized before completion of Appraisal. b. All ESMPs approved before commencing any construction for the five hospital subprojects. c. Before launching the procurement process for the relevant Project activities and thereafter throughout the carrying out of such activities. 	<p>MOH, the Republic of The Gambia (PCU)</p>
<p>1.3 EXCLUSIONS:</p> <p>Exclude the following activities as stipulated in the ESMF:</p> <ul style="list-style-type: none"> • Activities that have potential to cause any significant loss or degradation of critical natural habitats whether directly or indirectly • Activities that could adversely affect forest and forest health • Activities that could affect sites with archaeological, paleontological, historical, religious, or unique natural values • Activities that will result in the involuntary taking of land, relocation of households, loss of assets or access to assets that leads to loss of income sources or other means of livelihoods, and interference with households' use of land and livelihoods • Activities that have a high probability of causing serious adverse effects to human health and/or the environment • Activities that may have significant adverse social impacts and may give rise to significant social conflict • Use of goods and equipment on lands abandoned due to social tension / conflict, or the ownership of the land is disputed or cannot be ascertained • Activities that may affect land rights or rights of any vulnerable communities 	<p>These exclusions are used in the ESMF screening process for all subprojects.</p>	<p>MOH, the Republic of The Gambia (PCU)</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<ul style="list-style-type: none"> • Use of goods and equipment to demolish or remove assets, unless the ownership of the assets can be ascertained, and the owners are consulted • Uses of goods and equipment involving forced labour, child labour, or other harmful or exploitative forms of labour • Uses of goods and equipment for activities that would affect indigenous peoples, unless due consultation and broad support has been documented and confirmed prior to the commencement of the activities • Uses of goods and equipment for military or paramilitary purposes 		
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT: Key issues to be addressed in the LMPs include terms and conditions of employment, nondiscrimination and equal opportunity, as well as Occupational Health and Safety (OHS). The LMPs, part of the ESMF, describe how Project workers will be managed in accordance with the requirements of national law and the ESS2. Due diligence is also described in the ESMF to ensure Borrower meets requirements on child labor, forced labor and occupational health and safety apply to employees of the MOH and all contractors and subcontractors. Civil servants will be bound by their public sector contracts, unless their contract has been transferred to the Project. The LMP will include measures to ensure that labor is provided on a voluntary basis and will further ensure that the health and safety of workers, especially women, are given adequate attention.</p>	The LMP as part of the ESMF shall be prepared before completion of Appraisal, and all measures specified in this action shall be valid throughout Project implementation.	MOH, the Republic of The Gambia (PCU)
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS: A Project-wide grievance redress mechanism, proportionate to the potential risks and impacts of the Project are presented in the ESMF.</p>	Adopt, implement and update the grievance mechanism throughout the implementation of the Project.	MOH, the Republic of The Gambia (PCU)
2.3	<p>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES:</p>	All the measures specified under action 2.3 will be implemented throughout the Project implementation period.	MOH, the Republic of The Gambia (PCU)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<p>The project will ensure the application of OHS measures. This encompasses procedures for entry into health care facilities, including minimizing visitors and undergoing strict checks before entering; procedures for protection of workers in relation to infection control precautions; provision of immediate and ongoing training on the procedures to all categories of workers, and post signage in all public spaces mandating hand hygiene and personal protective equipment (PPE); ensuring adequate supplies of PPE (particularly facemask, gowns, gloves, handwashing soap and sanitizer); and overall ensuring adequate OHS protections in accordance with general Environmental, Health, and Safety Guidelines (EHS Guidelines) and industry specific EHS Guidelines and following evolving international best practice in relation to protection from COVID-19.</p>		
2.4	<p>CHILD LABOR AND MINIMUM AGE: Prohibit child labor (any person under the age of 18) due to the hazardous work situation.</p>	Throughout Project implementation	MOH, the Republic of The Gambia (PCU)
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>ENERGY EFFICIENCY: Each of the Project hospital renovation plans shall contain an assessment of energy efficiency improvements as part of the ESMP.</p>	Throughout Project implementation	MOH, the Republic of The Gambia (PCU)
3.2	<p>AIR EMISSIONS: During the four hospital renovations, all construction and/or retrofitting shall be undertaken observing appropriate health and safety measures for workers and all hospital staff and patients. The Kanifing Hospital expansion will observe measures to reduce and ensure minimal particulate/dust impacts or health risks. All of these provisions are detailed in the ESMF ESCOPs.</p>	Throughout Project implementation	MOH, the Republic of The Gambia (PCU)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.3	<p>INFECTION CONTROL AND MEDICAL WASTE MANAGEMENT:</p> <p>To operationalize the Health Care Waste Management (HCWM) plan, the MOH has developed HCWM Standard Operating Procedures (SOP) as detailed in the ESMF. Each of the Project healthcare facilities will prepare Waste Management Plans to prevent or minimize such adverse impacts based on World Health Organization (WHO) COVID-19 guidance documents, and other ESCOP also include guidance related to transportation and management of samples and medical goods or expired chemical products, as well as small scale rehabilitation activities.</p>	Throughout Project implementation	MOH, the Republic of The Gambia (PCU)
ESS 4: COMMUNITY HEALTH AND SAFETY			
	<p>Relevant aspects of this standard shall be considered, as needed, under action 1.2 above including, inter alia, measures to minimize the potential for community exposure to communicable diseases; ensure that individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, have access to the development benefits resulting from the Project; manage the risks of labor influx; and prevent and respond to SEA/SH.</p> <p>The ESMF will provide guidance regarding how these measures will be integrated.</p>	Throughout project implementation	MOH, the Republic of The Gambia (PCU)
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
	Not relevant		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	Not relevant		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Not relevant		
ESS 8: CULTURAL HERITAGE			
	Not relevant		

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 9: FINANCIAL INTERMEDIARIES		
Not relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE		
10.1 STAKEHOLDER ENGAGEMENT PLAN: Prepare, disclose, adopt, and implement an SEP consistent with ESS10, in a manner acceptable to the Association.	A draft SEP was already prepared and will be updated, as needed	MOH, the Republic of The Gambia (PCU)
10.2 GRIEVANCE MECHANISM: Prepare, adopt, maintain and operate a grievance mechanism, consistent with ESS10, in a manner acceptable to the Association. This mechanism also includes a special channel for handling complaints related to issues of gender-based violence, SEA/SH, and VAC. It should include several accessible and safe entry points, including access to communicate in local languages.	Will be operational prior to Project activities and will apply throughout Project implementation	MOH, the Republic of The Gambia (PCU)
CAPACITY SUPPORT (TRAINING)		
The ESMF capacity building section is directed to staff in the MOH, relevant government institutions, contractors and subcontractors, and communities. Six workshop topics will be conducted in partnership with the COVID-19 project. Each workshop has a designated target audience, a time frame for delivery and identification of who will facilitate the workshop. A budget estimate is also allocated. Based on social distancing protocols and COVID-19 precautions, these workshops can be delivered via remote connections and distance learning.	More details and expanded contents will be developed after Project effectiveness and shall be applied throughout Project implementation	MOH, the Republic of The Gambia (PCU)