

The Gambia  
Ministry of Health

**SECOND ADDITIONAL FINANCING TO THE  
GAMBIA COVID-19 PREPAREDNESS AND  
RESPONSE PROJECT**

**(P176125)**

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

**11 March 2021**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Gambia (the **Recipient**) will implement The Gambia COVID-19 Preparedness and Response Project (the **Project**), with the involvement of the following ministries/agencies/units: Ministry of Health. The International Development Association (the Association) has agreed to provide financing for the Project.
2. The Recipient 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, any specific documents or plans, as well as the timing for each of these.
3. The Recipient 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.
4. Implementation of the material measures and actions set out in this ESCP will 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 will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
5. 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 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 and the Recipient. The Recipient will promptly disclose the updated ESCP.
6. 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.

| MATERIAL MEASURES AND ACTIONS   |  | TIMEFRAME   | RESPONSIBLE ENTITY/AUTHORITY   |
|---|--|---|--------------------------------|
| <b>MONITORING AND REPORTING</b>   |  |   |                                |
| A   | <b>REGULAR REPORTING:</b> Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to, stakeholder engagement activities and grievances log as well as management of mitigation measures for risks related to sexual exploitation and abuse (SEA) and sexual harassment (SH), as outlined under the SEA/SH Prevention and Response Action Plan (SEA/SH AP) for the project.   | Starting from the Effective Date, quarterly reports shall be submitted no later than 3 weeks after the end of each reporting period, throughout Project implementation.   | Ministry of Health, The Gambia |
| B   | <b>INCIDENTS AND ACCIDENTS:</b> Promptly notify the [Bank/Association] 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 [, <i>including, inter alia, any COVID outbreak in the Project area</i> ] as well as any SEA/SH-related incidents in accordance with appropriate reporting procedures for these types of cases. Provide sufficient detail regarding the incident or accident while respecting confidentiality, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and supervising entity, as appropriate. Subsequently, as per the [Bank/Association]'s request, prepare a report on the incident or accident and propose any measures to prevent its recurrence. | Notify the Bank within 48 hours after learning of the incident or accident. A report would be provided within a timeframe acceptable to the Association, as requested.  | Ministry of Health, The Gambia |
| <b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b> |  |   |                                |
| 1.1   | <b>ORGANIZATIONAL STRUCTURE:</b> The Ministry of Health shall establish and maintain a PCU with qualified staff and resources to support management of environmental and social risks and impacts of the Project including environmental, social, Occupational Health, Safety and SEA/SH risk management specialists.  | The PCU includes a Senior Operations Officer who supports project implementation. The PCU also includes Environmental and Social Safeguards focal points to implement the Environmental and Social Commitment Plan (ESCP) and help ensure the project is carried out in accordance with the ESMF. | Ministry of Health, The Gambia |

| MATERIAL MEASURES AND ACTIONS  | TIMEFRAME   | RESPONSIBLE ENTITY/AUTHORITY          |
|--|---|---------------------------------------|
| <p>1.2 <b>ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS</b></p> <p>a. Assess the environmental and social risks and impacts of proposed Project activities, including SEA/SH-related risks, in accordance with the <i>Environmental and Social Management Framework (ESMF)</i> to be updated, disclosed, consulted and adopted for the Project, the ESSs, the Environmental, Health and Safety Guidelines (EHSGs), and other relevant Good International Industry Practice (GIIP), including relevant WHO guidelines.</p> <p>b. Prepare, disclose, consult, adopt and implement any environmental and social management plans (e.g. health-care waste management plans), instruments or other measures required for the respective Project activities based on the assessment process, in accordance with the ESSs, the ESMF, the EHSGs, and other relevant Good International Industry Practice (GIIP), including the SEA/SH AP as well as relevant WHO guidelines to, inter alia, ensure access to and allocation of Project benefits in a fair, equitable and inclusive manner, taking into account the needs of individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable [, <i>including, as relevant, with regards to vaccines</i>].</p> <p>c. Incorporate the relevant aspects of this ESCP, including, inter alia, the ESMF, any environmental and social management plans or other instruments, including key mitigation measures for contractors under the SEA/SH AP, 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.</p> <p>d. Adopt procedures, protocols and/or other measures to ensure Project beneficiaries that receive vaccines under the Project do so under a program that does not include forced vaccination or exacerbate SEA/SH-related risks and is acceptable to the Bank, as set out in the ESMF.</p> | <p>a. An updated ESMF shall be prepared, disclosed, consulted and adopted before the Effective Date; Assessment shall be conducted before the carrying out of the relevant Project activities.</p> <p>b. Plans/instruments shall be prepared, disclosed, consulted and adopted before the carrying out of the relevant Project activities, and thereafter implemented throughout the carrying out of such activities.</p> <p>c. The relevant ESHS measures shall be incorporated into the procurement documents before launching the procurement process for the relevant Project activities, and shall thereafter complied with throughout the carrying out of such activities.</p> <p>d. Before the carrying out of the relevant Project activities, and thereafter implemented throughout the carrying out of such activities.</p> | <p>Ministry of Health, The Gambia</p> |

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|---|--|--|--------------------------------|
| 1.3   | <p><b>EXCLUSIONS:</b> Exclude the following type of activities as ineligible for financing under the Project:</p> <ul style="list-style-type: none"> <li>• Activities that may cause long term, permanent and/or irreversible (e.g. loss of major natural habitat) adverse impacts</li> <li>• Activities that have high probability of causing serious adverse effects to human health and/or the environment</li> <li>• Activities that may have significant adverse social impacts and may give rise to significant social conflict</li> <li>• Activities that may affect lands or rights of any vulnerable communities,</li> <li>• Activities that may involve permanent resettlement or land acquisition or adverse impacts on cultural heritage</li> </ul> <p>All the other excluded activities set out in the ESMF of the Project.</p> | These exclusions shall be applied as part of the assessment process conducted under action 1.2.a. above. | Ministry of Health, The Gambia |
| <b>ESS 2: LABOR AND WORKING CONDITIONS</b>                                |  |  |                                |
| 2.1   | <p><b>LABOR MANAGEMENT:</b> The Project shall be carried out in accordance with the applicable requirements of ESS2 including through, inter alia, implementing adequate occupational health and safety measures (including personal protective equipment, emergency preparedness and response measures, as well as relevant measures to mitigate risk of SEA/SH on the worksite), setting out grievance mechanisms for Project workers, which will likewise include specific procedures to address workplace SH claims, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms, including contract requirements to address SEA/SH risks.</p>   | Throughout Project implementation.   | Ministry of Health, The Gambia |
| <b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> |  |  |                                |

| MATERIAL MEASURES AND ACTIONS   |   | TIMEFRAME                          | RESPONSIBLE ENTITY/AUTHORITY   |
|---|---|------------------------------------|--------------------------------|
|   | Relevant aspects of this standard shall be considered, as needed, under action 1.2 above, including, inter alia, measures to: carry out the purchase, storage, transportation and handling of vaccines (including, ultra-cold chain management) in a safe manner and in accordance with the EHSGs, and other relevant GIP including relevant WHO guidelines; and adequately manage and dispose of health care wastes (including, vaccines) and other types of hazardous and non-hazardous wastes.   | Throughout Project implementation. | Ministry of Health, The Gambia |
| <b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>   |   |                                    |                                |
| 4.1   | <b>COMMUNITY HEALTH AND SAFETY:</b><br>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; establish and implement appropriate quality management systems to manage the risks and the impacts that services provided and activities carried out under the Project may have on community health and safety, including mitigation measures to address SEA/SH; and mitigate, prevent, and respond to risks related to SEA and SH. | Throughout Project implementation. | Ministry of Health, The Gambia |
| <b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>                       |   |                                    |                                |
|   | Relevant aspects of this standard shall be considered, as needed, under action 1.2 above. In case land acquisition leading to economic or physical displacement would be necessary, resettlement action plans would be developed to the satisfaction of the Bank prior to commencement of any land acquisition.   | Throughout Project implementation. | Ministry of Health, The Gambia |
| <b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>              |   |                                    |                                |
|   | Relevant aspects of this standard shall be considered, as needed, under action 1.2 above.   | Throughout Project implementation. | Ministry of Health, The Gambia |
| <b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b> |   |                                    |                                |
| 7.1   | Not relevant  |                                    |                                |

| MATERIAL MEASURES AND ACTIONS                                    |  | TIMEFRAME  | RESPONSIBLE ENTITY/AUTHORITY   |
|--|--|--|--------------------------------|
| <b>ESS 8: CULTURAL HERITAGE</b>                                  |  |  |                                |
|  | Relevant aspects of this standard shall be considered, as needed, under action 1.2 above.  | Throughout Project implementation.   | Ministry of Health, The Gambia |
| <b>ESS 9: FINANCIAL INTERMEDIARIES</b>                           |  |  |                                |
|  | Not relevant   | Throughout Project implementation.   | Ministry of Health, The Gambia |
| <b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b> |  |  |                                |
| 10.1   | <b>STAKEHOLDER ENGAGEMENT PLAN:</b> Prepare or revise, disclose, consult, adopt and implement a Stakeholder Engagement Plan (SEP) 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. The SEP should make provisions for independent consultations with women, and other vulnerable groups as needed, in safe and enabling spaces with same-sex facilitators.   | A draft SEP was already prepared and disclosed, and shall be consulted, updated and adopted before the Effective Date. The SEP shall be implemented throughout Project implementation. | Ministry of Health, The Gambia |
| 10.1   | <b>STAKEHOLDER ENGAGEMENT INFORMATION AND DISCLOSURE:</b> Adopt measures to ensure that the carrying out of Project activities includes stakeholder engagement and information disclosure consistent with ESS10, including 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. As noted above, the SEP should make provisions for independent consultations with women, and other vulnerable groups as needed, in safe and enabling spaces with same-sex facilitators. | Throughout Project implementation.   | Ministry of Health, The Gambia |

| MATERIAL MEASURES AND ACTIONS      |  | TIMEFRAME  | RESPONSIBLE ENTITY/AUTHORITY   |
|------------------------------------|--|--|--------------------------------|
| 10.2                               | <p><b>GRIEVANCE MECHANISM:</b> An accessible grievance mechanism has been established and publicized under the parent project and shall continue 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 SEA and SH in an ethical, safe, and confidential manner, including through the timely referral of survivors to appropriate gender-based violence service providers.</p> <p>The grievance mechanism shall also receive, register and address concerns arising from unintended health consequences after vaccination especially those resulting in serious adverse effects, [and, as appropriate, requests for compensation].</p> | Throughout Project implementation.   | Ministry of Health, The Gambia |
| <b>CAPACITY SUPPORT (TRAINING)</b> |  |  |                                |
| CS1                                | Projects Coordination Unit and other relevant implementing support staff responsible for the Project to receive training on the Project’s ESHS plans and instruments, fair, equitable and inclusive access and allocation of Project benefits including with regards to vaccines, and the roles and responsibilities of different key agencies in the ESF implementation. This training shall likewise address mitigation, prevention, and response to SEA/SH-related risks and ensure that project personnel have adequate information to address these claims safely and confidentially.   | No later than 60 days of the Effective Date and periodically with the addition of new Project team members join the Project throughout implementation. | Ministry of Health, The Gambia |
|                                    |  |  |                                |