

Republic of Sudan

Sudan COVID-19 Response Project
Draft

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

September 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Sudan (hereinafter the **Recipient**) shall implement the Sudan COVID-19 Response Project (the **Project**), with the involvement of the Ministry of Health (MoH). The International Development Association (hereinafter **the Association**) has agreed to provide financing for the Project.
2. The Recipient 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 Recipient shall also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as the Environmental and Social Management Framework (ESMF), any Environmental and Social Management Plan (ESMP), any Infection Control and Waste Management Plan (ICWMP) and the Stakeholder Engagement Plan (SEP), and the timelines specified in those documents.
4. 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.
5. 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 shall monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. 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 through its delegated representatives shall 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 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 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
MONITORING AND REPORTING			
A	REGULAR REPORTING: 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.	Quarterly throughout the Project implementation period	Ministry of Health
B	Report serious incidents related to the Project, including but not limited to those related to Occupational Health and Safety (OHS) Serious incident is an incident that is causing or will cause significant harm to the environment, workers, communities, or natural or cultural resources, is complex and/or costly to reverse and may result in some level of lasting damage or injury	Within 48 hrs. for Borrower becoming aware of the incident	Ministry of Health TTL prepares Incident Report (within 24 hours) and circulates internally
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE: Ministry of Health shall establish a PMU with qualified staff and resources to support management of environmental and social risks and impacts of the Project including environmental and social risk management specialists. Environmental and social risk management specialists will be appointed from existing staff or hired as deemed necessary.	Full PMU to be established before commencement of Project activities and maintained throughout Project implementation	Ministry of Health

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS</p> <p>a. Assess the environmental and social risks and impacts of proposed Project activities, including to 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, in accordance with ESSs and the Environmental and Social Management Framework (ESMF). The ESMF will include a template for Infection Control and Waste Management Plan (ICWMP) as well as a template for Environmental and Social Management Plan (ESMP) for any isolation centers that may need to be constructed.</p> <p>b. Prepare, publicly consult, disclose, adopt, and implement Infection Control and Waste Management Plans, Environmental and Social Management Plans and any other instruments necessary for the respective Project activities based on the screening and assessment process, in accordance with the ESSs, the ESMF, the ESHGs and other relevant Good International Industry Practice (GIIP) including relevant WHO Guidelines related to COVID-19, in a manner acceptable to the Association.</p> <p>c. Prepare, publicly consult, disclose and implement a Social Assessment and Social Management Plan; a GBV risk Assessment and GBV mitigation plan; an assessment on Security and Security Management Plan; and Labor Management Procedure annex to ESMF</p> <p>d. Incorporate the relevant aspects of this ESCP, including, inter alia, any environmental and social management plans 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.</p> <p>e. Update environmental and social management plans or other instruments based on updated guidance by WHO on COVID19.</p>	<p>a. The ESMF shall be prepared, disclosed and adopted no later than one month from Project effectiveness and before the carrying out of the relevant Project activities.</p> <p>b. Before carrying out of the relevant Project activities, and thereafter throughout the carrying out of such activities.</p> <p>c. No later than one month from Project effectiveness and before the carrying out of the relevant Project activities.</p> <p>d. Throughout project implementation</p>	<p>Ministry of Health</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.3 EXCLUSIONS: Exclude the following type of activities as ineligible for financing under the Project:</p> <ul style="list-style-type: none"> • Laboratory activities that may require BSL3 lab facilities • Activities that may cause long term, permanent and/or irreversible (e.g. loss of major natural habitat) adverse impacts • Activities that have high probability of causing serious adverse effects to human health and/or the environment not related to treatment of COVID-19 cases • Activities that may have adverse social impacts and may give rise to significant social conflict • Activities which would require the free, prior, informed consent of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities under ESS7 para. 24 Free Prior Informed Consent. • Activities that may affect lands or rights of underserved people or other vulnerable minorities, • Activities that may involve permanent resettlement or land acquisition, adverse impacts on cultural heritage • All the other excluded activities set out in the ESMF of the Project. 	<p>During the assessment process conducted under action 1.2.a. above.</p>	<p>Ministry of Health</p>
ESS 2: LABOR AND WORKING CONDITIONS		
<p>2.1 Relevant aspects of this standard shall be considered, as needed, under action 1.2 above.</p>	<p>Throughout Project implementation.</p>	
<p>2.2 LABOR MANAGEMENT: The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Association, including through, inter alia, implementing adequate occupational health and safety measures (including emergency preparedness and response measures), setting out grievance arrangements for Project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.</p>	<p>Throughout Project implementation.</p>	<p>Ministry of Health</p>
<p>2.3 Prepare and adopt Labor Management Procedures (to be part of the ESMF referred to in Section 1.2 of this ESCP)</p>	<p>One month from Project effectiveness</p>	<p>Ministry of Health</p>
<p>2.4 The Borrower shall ensure a non-discriminatory, decent work environment; including by ensuring that all health workers adhere to the WHO Code of Ethics and Professional conduct.</p>	<p>Throughout Project implementation</p>	<p>Ministry of Health</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.5	Implement the Labor Management Procedures	Throughout Project implementation	Ministry of Health
2.6	The Borrower shall establish a grievance mechanism consistent with ESS2, including a hotline and assignment of focal points within MoH to address work related grievances	Grievance mechanism to be operational as soon as possible and no later than [DEADLINE] and remain effective throughout Project implementation	Ministry of Health
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above, including, inter alia, measures to: manage health care wastes, and other types of hazardous and non-hazardous wastes. Each beneficiary medical facility/lab, consistent with the requirements of the ESMF in Section 1.2 of this ESCP, WHO COVID-19 guidance documents, and other best international practices, will prepare and follow an Infection Control and Medical Waste Management Plan (ICMWP) to prevent or minimize such adverse impacts. The ESMF and site-specific instruments (ESMPs) will include guidance related to transportation and management of samples and medical goods or expired chemical products. Resources (water, air, etc.) used in quarantine facilities and labs will follow standards and measures in line with CDC and WHO environmental infection control guidelines for medical facilities	Throughout Project implementation.	Ministry of Health
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	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 the use of security personnel; manage the risks of labor influx; and prevent and respond to sexual exploitation and abuse, and sexual harassment.	Throughout Project Implementation.	Ministry of Health
4.2	The Borrower will put measures in place to prevent or minimize the spread of the infectious disease/COVID-19 to the community.	Throughout Project implementation	Ministry of Health
4.3	The Borrower will implement emergency preparedness measures in case of laboratory accidents/ emergencies e.g. a fire response or natural phenomena event	Throughout Project implementation	Ministry of Health

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.4	The Borrower will operate any quarantine and isolation centers in line with WHO guidelines on “Key considerations for repatriation and quarantine of travelers in relation to the outbreak of novel coronavirus 2019-nCoV”	Throughout Project implementation	Ministry of Health
4.5	The Borrower will conduct a GBV risk assessment and prepare and adopt a GBV action plan, including to identify mitigation measures to be implemented as part of ESMF in Section 1.2 of this ESCP	GBV assessment and action plan to be completed and adopted no later than one month from Project effectiveness, and to be implemented throughout the Project implementation	
4.5	The Borrower will ensure the avoidance of any form of Sexual Exploitation and Abuse, including by relying on the WHO Code of Ethics and Professional conduct for all workers in the quarantine facilities and integrating appropriate training and codes of conduct in the Labor Management Procedure referred to in Section 2.3 of this ESCP. All Project workers involved in the quarantine and isolation facilities must be adequately informed and trained on the WHO professional code of conduct and abide by it through out the Project period. Further, Borrower will provide gender-sensitive infrastructure, such as segregated toilets and enough light in any quarantine and isolation centers.	Throughout Project implementation	Ministry of Health
4.6	The Borrower will operate any quarantine and isolation centers and screening posts in a conflict-sensitive manner, avoiding any aggravation of local communal conflicts, including between host communities and refugees/IDPs.	Throughout Project implementation	Ministry of Health

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.7	<p>The Borrower will ensure that any public or private security personnel operating or assisting with quarantine and isolation centers and screening posts, or otherwise involved in the Project, abide by clear rules of engagement and a code of conduct consistent with ESS4 and acceptable to the Association.</p> <p>These rules of engagement and code of conduct shall ensure that public and private security personnel associated with the Project have been: (i) screened to confirm that they have not engaged in past unlawful or abusive behavior, including SEA, SH or excessive use of force; (ii) adequately instructed and trained, on a regular basis, on the use of force and appropriate behavior and conduct (including in relation to SEA and SH); (iii) deployed in a manner consistent with applicable national law; (iv) will follow strict rules of engagement, code of conduct, and avoid any escalation, and (v) ensure an efficient monitoring of the security personnel on field.</p>	Rules of engagement and code of conduct to be adopted before involvement of any public or private security personnel, and implemented throughout Project implementation	Ministry of Health
4.8	Conduct security risk assessment and prepare, adopt, and implement a security management plan consistent with ESS4 and acceptable to the Association	Prepare before any physical engagement in high-risk security or conflict prone areas, and maintain throughout Project implementation	Ministry of Health
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	Not applicable as no land acquisition, restriction on land use and involuntary resettlement is anticipated		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above.	Throughout Project implementation.	Ministry of Health
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above	Throughout Project implementation.	Ministry of Health
7.2	The Borrower will ensure that such communities are appropriately informed and share in the benefits of the project in an inclusive and culturally appropriate manner (i.e. prevention and treatment) with provisions included in the SEP	Throughout Project implementation.	Ministry of Health

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
7.3	In case SSAHUTLC communities would be addressed by quarantine provisions, site-specific approaches must be prepared to ensure adequate consideration of their specific cultural needs, to the satisfaction of the Bank.	Throughout Project implementation.	Ministry of Health
ESS 8: CULTURAL HERITAGE			
	Relevant aspects of this standard shall be considered, as needed such as for chance finds, under action 1.2 above	Throughout Project implementation.	Ministry of Health
ESS 9: FINANCIAL INTERMEDIARIES			
	Not relevant based on the project design		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN: Prepare, update, disclose and adopt a Stakeholder Engagement Plan (SEP) consistent with ESS10, in a manner acceptable to the Association. The updated version of the SEP will include a risk communication and community engagement (RCCE) strategy, to be finalized under the Project in line with WHO guidance on “Risk communication and community engagement (RCCE) readiness and response to the 2019 novel coronavirus (2019-nCoV)” (January 26, 2020), and adopt it consistent with ESS10, in a manner acceptable to the Association.	A draft SEP was already prepared and disclosed and shall be updated not later than one month after Project Effectiveness	Ministry of Health
10.2	CASE MANAGEMENT: In line with the SEP, the Project will ensure systematic case management, allowing communication between quarantined people and their relatives.	Throughout Project implementation.	Ministry of Health
10.3	GRIEVANCE MECHANISM: Accessible grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Association.	Grievance mechanism to be operational by Project effectiveness and maintained throughout Project implementation.	Ministry of Health
CAPACITY SUPPORT (TRAINING)			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>Training topics for personnel involved in Project implementation will among others include:</p> <ul style="list-style-type: none"> • COVID-19 Infection Prevention and Control Recommendations • Laboratory biosafety guidance related to the COVID-19 • Specimen collection and shipment • Standard precautions for COVID-19 patients • Risk communication and community engagement • Grievance redress mechanisms • WHO on quarantine including case management • Gender-Based Violence Risk Mitigation 	<p>Throughout Project implementation.</p>	<p>Ministry of Health</p>