

Public Disclosure Authorized

**Republic of The Gambia
Ministry of Health**

**THE GAMBIA ESSENTIAL HEALTH SERVICES
STRENGTHENING PROJECT (P181659)**

Third Additional Financing

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

March 26, 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of The Gambia (the Recipient) is implementing The Gambia Essential Health Services Strengthening Project (the Project), with the involvement of the Ministry of Health, (Project Coordinating Unit or PCU), as set out in the Financing Agreement, and the project Agreement. The International Development Association (the Association) has agreed to provide the parent financing (P173287), the first additional financing (P177263), the second additional financing (P181161), and the third additional financing (P181659) for the Project, as set out in the referred agreement. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the second additional financing for Project referred to above.
2. The Recipient shall 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 Association. The ESCP is a part of the Financing Agreement and the Project Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through the Ministry of Health and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient/Ministry of Health. The Recipient, through the Project Coordination Unit shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>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 the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s) (GM) for project workers, project level and GM process for responding to incidents of sexual exploitation and abuse/sexual harassment (SEA/SH).</p>	<p>Submit quarterly reports to the Association throughout Project implementation no later than twenty-one days after the end of each reporting period.</p>	<p>Projects Coordination Unit (PCU)</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the 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, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury [specify other examples of incidents and accidents, as appropriate for the type of operation]. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident, and within 24 hours in case of a fatality, allegations of SEA/SH, or any other severe incident/accident.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association.</p>	<p>PCU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
C	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>	Submit the monthly reports to the Association upon request as annexes to the reports to be submitted under action A above.	PCU
D	<p>NOTIFICATIONS RELATING TO DAAB COMPLIANCE REVIEW OF CONTRACTOR COMPLIANCE WITH SEA/SH PREVENTION AND RESPONSE OBLIGATIONS</p> <p>Notify the Association of any referral submitted to the Dispute Avoidance and Adjudication Board (DAAB) to initiate a process of compliance review in relation to a contractor's obligations to prevent and respond to sexual exploitation and abuse (SEA), and/or sexual harassment (SH) specified in the respective works contract with such contractor; and, in the event of any such referral, notify the Association of: (i) the DAAB's decision on such referral; (ii) the contractor's Notice of Dissatisfaction, if any, with such DAAB decision; (iii) any notification received on the commencement of an emergency arbitration proceeding or full arbitration proceeding in relation to the DAAB's decision; and (iv) the resulting emergency arbitration order and/or full arbitration order, if any.</p>	No later than 7 days after the issuance or receipt, as applicable, of the relevant document (i.e., referral to the DAAB, issuance of DAAB decision, Notice of Dissatisfaction, notice of commencement of emergency/full arbitration, emergency/full arbitration order, as applicable).	PCU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Maintain the existing PCU with qualified staff and resources to support management of ESHS risks and impacts of the Project including: a Senior Operations Officer who is the main coordinator and focal point for environmental and social issues, supported by the MOH Environmental Health Program Manager, the Health Communications Manager, the SEA/SH/GBV Focal Point and the Environmental Safeguards Consultant.</p>	1. Throughout project implementation.	PCU
1.2	ENVIRONMENTAL AND SOCIAL INSTRUMENTS		

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ol style="list-style-type: none"> 1. Adopt and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) of proposed activities related to the construction of the National Food and Drug Quality Control Laboratory (NFDQCL) and Biomedical Engineering Unit (BEU) of the project consistent with the relevant ESSs. 2. Adopt, and implement the Environmental and Social Management Framework (ESMF) of the Parent Project, updated for the first AF Project, consistent with the relevant ESSs. This ESMF is applicable to the second AF and third AF 3. Cause any entity involved in the implementation of sub-projects/project activities to adopt and implement subproject/site specific ESIA and ESMPs if applicable as set out in the ESMF. 	<ol style="list-style-type: none"> 1. Adopt ESIA and ESMP before starting construction, and thereafter implement the ESIA and ESMP throughout Project implementation. 2. Adopt and implement the ESMF updated as part of the first AF that was disclosed October 26, 2021, and thereafter implement the ESMF throughout Project implementation 3. Adopt the ESMP before starting construction for the respective subproject/Project activity that requires the adoption of such ESMP. Once adopted, implement the respective ESMP throughout Project implementation. 	<p>PCU</p>
<p>1.3 MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and ensure that subcontractors comply with the ESHS specifications of their respective contracts. These specifications will also apply to the construction of the new mosque which is being paid by the MoH and not by the project. The MoH will ensure that the contractors for the new mosque abide with the same e and s standards as the rest of the project construction. The NGO who will be undertaking the construction of the new mosque must have an appropriate and s management plan that will include labor management procedures.</p>	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. The MoH will develop monitoring mechanisms and will regularly monitor the work of the construction of the new mosque which is being undertaken by an NGO.</p>	<p>PCU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project, are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	PCU
1.5	<p>CONTINGENT EMERGENCY RESPONSE FINANCING</p> <p>a) Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements, including, where appropriate, a CERC-ESMF Addendum that will be included or referred to in the CERC Manual for the implementation of the CERC component (component 3) in accordance with the ESSs.</p> <p>b) Adopt any environmental and social (E&S) instruments that may be required for the activities under component 3 of the Project, in accordance with CERC Manual and if applicable, CERC-ESMF or CERC-ESMF Addendum, and the ESSs, and thereafter implement the measures and actions required under said E&S instruments, within the timeframes specified in said E&S instruments.</p>	<p>a) The adoption of the CERC Manual, and if applicable, other relevant instruments in form and substance acceptable to the Association, is a withdrawal condition under Section III of Schedule 2 of the financing agreement for the Project.</p> <p>b) Before the carrying out of the relevant Project activities for which the E&S instrument is required. Implement the E&S instruments in accordance with their terms, throughout Project implementation.</p>	PCU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p>	Throughout Project implementation.	PCU Contractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Adopt and implement the Labor Management Procedures (LMP) for the Parent 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 supervising firms.		
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	PCU Contractors
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>WASTE MANAGEMENT PLAN</p> <p>Adopt and implement the Asbestos Remedial Action Plan that has been developed and disclosed on September 9, 2022, and Waste Management Plan (WMP) already developed for constructions in progress, to manage hazardous and non-hazardous wastes, consistent with ESS3.</p> <p>For new constructions planned under the second AF, the WMP will be prepared with specific E&S studies and these requirements will be added in the clauses of the contractor to take them into account in their C-ESCP</p>	Prior to starting any physical work, and thereafter implement applicable ARAP and WMP throughout Project implementation.	PCU
3.2	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.2 above.</p>	Same timeframe as for the adoption and implementation of the ESMP	PCU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.2 above, and contractors ESMPs.</p>	Same timeframe as for the adoption and implementation of the ESMP and C-ESMP	PCU contractors

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<p>4.2 COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities, including behavior of Project workers, risk of labor influx, response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.</p>	<p>Same timeframe as for the update of the PP ESMF and the adoption and implementation of the ESMPs and C-ESMPs.</p>	<p>PCU Contractors</p>
<p>4.3 SEA AND SH RISKS Ensure proper implementation of the SEA/SH action plan included in the project ESMF as well as project related SEA/SH risks assessed in the revised SEP, the LMP and GRM Measures to raise awareness, prevent and mitigate these risks must be documented in the form of code of conduct and training sessions must be organized to raised awareness among the various project’s stakeholders Ensure that the works contract or service contracts under the project require contractors, subcontractors, or suppliers to adopt a code of conduct that will cover gender-based violence, violence again children and their exploitation and abuse</p>	<p>Throughout the project implementation period.</p>	<p>PCU</p>
<p>4.4 SECURITY MANAGEMENT Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, set out in the ESMP or Security Management Plan, guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.</p>	<p>Same timeframe as for the updating of the PP ESMF and the preparation of ESIA/ESMPs, and Prior to engaging security personnel and thereafter implement security measures throughout Project implementation.</p>	<p>PCU</p>
<p>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY</p>		
<p>Not relevant.</p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Adopt and implement biodiversity management measures in accordance with the guidelines of the ESMF and the ESIA/ESMP prepared or to be prepared for the Project, and in accordance with ESS 6.</p>	<p>Same timeframe as for the ESIA/ESMP prepared or to be prepared for the Project and the preparation of ESIA/ESMP and thereafter implement these measures throughout project implementation.</p>	PCU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
<p>Not relevant, as there are no IP/SSAHUTLCs in the project area.</p>			
ESS 8: CULTURAL HERITAGE			
8.1	<p>CULTURAL HERITAGE RISKS AND IMPACTS</p> <p>Adopt and implement cultural heritage management measures as per the ESMF/ESIA/ESMP guidelines, consistent with ESS 8. Particular care will be taken with the removal of the old mosque and construction of the new mosque. The MoH will consult with local communities and religious leaders on the processes and ceremonies, if any required, for these works.</p>	<p>Same timeframe as for the ESIA/ESMP prepared or to be prepared for the Project and thereafter implement these measures throughout project implementation</p>	PCU
8.2	<p>CHANCE FINDS</p> <p>Describe and implement the chance finds procedures, as part of the ESMF/ESMP of the Project</p>	<p>Same timeframe as for the update of the ESMF and subsequent ESMPs. Implement the procedures throughout project implementation.</p>	PCU
ESS 9: FINANCIAL INTERMEDIARIES			
<p>Not relevant.</p>			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Update, adopt, disclose and implement a Parent Project Stakeholder Engagement Plan (SEP), consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and</p>		PCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation. This will include additional consultation on the building of the new mosque and the decommissioning of the old mosque.	Prior to the third AF project Appraisal and thereafter implement the SEP throughout Project implementation.	
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Update, maintain and operate the Grievance mechanism established by the MOH 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 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.</p>	Prior the third AF project Appraisal, and there after implement the GM throughout Project implementation.	PCU
CAPACITY SUPPORT			
	<p>Training topics for personnel involved in Project implementation will among others include:</p> <ul style="list-style-type: none"> • Health management information system (HMIS), monitoring and evaluation (M&E), and Information and communications technology (ICT) capacity at central, regional and facility levels • Train laboratory personnel on updated Laboratory SOPs • Midwifery training, postgraduate training for nurses and doctors, laboratory and pharmacy staff training • Social and behavior change communication (SBCC) • Results-based financing (RBF) principles and approaches for central, regional and facility level • Claims processing, enrollment and establishing national health insurance scheme (NHIS) • Electronic case-based surveillance system 	Throughout project implementation.	PCU Association Consultants

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none"> • Training on Environmental and Social Standards applicable to the project for the PCU staff and collaborating partners (government agencies...) 		