

Public Disclosure Authorized

Republic of Liberia



***Institutional Foundations to Improve Services For  
Health (IFISH) (P169641) and Additional  
Financing for Liberia Institutional Foundations to  
Improve Services for Health (P177050)***

[Draft]

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

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**August 9 2022**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Liberia (“Recipient”) is implementing the Institutional Foundations to Improve Services for Health Project (IFISH) (the Original Project), with the involvement of the Ministry of Health (MOH) as its implementing agency, as set out in the Original Financing Agreement (Credit No. 6646-LR). The International Development Association (IDA) acting on its own behalf, and IDA and the International Bank for Reconstruction and Development acting as an administrator of the GFF Trust Fund (together, the Bank), has agreed to provide additional financing for the implementation of the Additional Financing for Liberia Institutional Foundations to Improve Services for Health Project (the Project), as set out in the Financing Agreement and the GFF Grant Agreement. This ESCP supersedes previous versions of the ESCP for the Project and shall apply both to the original and the additional financing referred 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 Bank. The ESCP is a part of the Financing Agreement and the GFF Grant Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreements.
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 Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Bank.
4. As agreed by the Bank and the Recipient, this ESCP will be revised from time to time 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 Ministry of Health and the Bank agree to update the ESCP to reflect such changes through the exchange of letters signed between the Bank and the Republic of Liberia’s Minister of MOH. The Recipient through MOH shall promptly disclose the updated ESCP.

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 the E&amp;S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s), and other E&amp;S responsibilities agreed with the Bank.</p>	<p><i>Quarterly starting from the Project Effective Date (no later than 5 days after the end of each reporting period) and throughout Project implementation.</i></p>	<p>MOH/PIU</p>
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>The Recipient shall 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, cases of GBV, sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. 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 Bank’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p><i>Notify the Bank immediately or no later than 48 hours after learning of the incident or accident. GBV, SEA/SH specific cases shall be notified within 24 hours.</i></p> <p><i>Provide subsequent report to the Bank within 10 days of the incident/accident.</i></p>	<p>MOH/PIU</p> <p>MOH/PIU</p>
C	<p><b>CONTRACTORS MONTHLY REPORTS</b></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 Bank.</p>	<p><i>Submit the monthly reports to the Bank upon request.</i></p>	<p>MOH/PIU</p>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Maintain the existing PIU within MOH, with qualified E&amp;S staff and resources to support management of ESHS risks and impacts of the Project, including (i) two Environmental Safeguard Specialist with experience in ESHS risks management and (ii) one Social Safeguard Officer with experience in GBV, SEA/SH risks management. These environmental and social (E&amp;S) specialists shall be responsible for managing the E&amp;S risks of the Project and ensuring that the Project is implemented in accordance with this ESCP and in a manner acceptable to the Bank.</p>	<p><i>Maintain the PIU and mentioned E&amp;S staff and resources throughout Project implementation.</i></p>	<p>MOH/PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.2	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT/ MANAGEMENT PLANS AND INSTRUMENTS</b></p> <ol style="list-style-type: none"> <li>1. Update and re-disclose the ESMP prepared for the New Redemption Hospital in order to include potential flood risk, and the corresponding mitigation measures, and innovative measures to support a healthy wetland in the receiving environment.</li> <li>2. Prepare, consult upon, disclose, adopt, and implement site-specific Environmental and Social Management Plans (ESMPs) for Sub-component 1.2 of the Project involving small civil works (rehabilitation and extension of existing primary healthcare infrastructure, including the construction of basic houses at the targeted health centers), consistent with the relevant ESSs prior to commencement of the activities.</li> <li>3. Adopt and implement the revised National Healthcare Waste Management Plans (NHCWMP) prepared and disclosed under the Original Project (P169641) and the National Infection Prevention and Control (IPC) Guidelines, consistent with the relevant ESSs, and in accordance with relevant WHO guidelines, and any other relevant guidelines, in a manner acceptable to the Bank.</li> <li>4. Adopt, disclose, and implement the site/facility-specific Healthcare Waste Management Plan (HCWMP) for the New Redemption Hospital.</li> </ol>	<ol style="list-style-type: none"> <li>1. <i>Disclose and adopt draft updated ESMP prior to carrying out the construction works for the New Redemption Hospital. Once adopted, implement the updated ESMP throughout Project implementation.</i></li> <li>2. <i>Prepare, consult upon, disclose, and adopt site-specific ESMPs prior to the launching of the relevant sub-project bidding process for the respective small-scale civil works. Once adopted, implement the respective ESMPs throughout Project implementation.</i></li> <li>3. <i>Adopt the NHCWMP and National IPC Guidelines prior to the Project Effective Date; thereafter implement the NHCWMP and National IPC Guidelines throughout Project implementation.</i></li> <li>4. <i>Adopt and disclose the site/facility-specific HCWMP for the New Redemption Hospital prior to deployment of vaccines and implement throughout Project implementation.</i></li> </ol>	MOH/PIU
1.3	<p><b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&amp;S instruments (HCWMP, site-specific ESMPs, Stakeholder Engagement Plan, Gender Based-Violence/SEA/SH Action Plan, Labor Management Procedures) 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 cause subcontractors to comply with the ESHS specifications of their respective contracts.</p>	<p><i>As part of the preparation of procurement documents and respective contracts.</i></p> <p><i>Supervise contractors throughout Project implementation.</i></p>	MOH/PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	<i>Throughout Project implementation.</i>	<i>MOH/PIU</i>
1.5	<p><b>CONTINGENT EMERGENCY RESPONSE FINANCING</b></p> <p>a) Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements for the implementation of the CERC Part, in accordance with the ESSs.</p> <p>b) Adopt any E&amp;S instruments which may be required for activities under the CERC Part of the Project, in accordance with the CERC Manual and the ESSs, and thereafter implement the measures and actions required under said E&amp;S instruments, within the timeframes specified in said E&amp;S instruments.</p>	<p>a) The adoption of the CERC Manual in form and substance acceptable to the Bank is a withdrawal condition under Section III.B.1(b) of Schedule 2 of the Financing Agreement for the Project.</p> <p>b) Adopt any required E&amp;S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&amp;S instrument is required. Implement the E&amp;S instruments in accordance with their terms, throughout Project implementation.</p>	<i>MOH/PIU</i>
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Adopt and implement the Labor Management Procedures (LMP), which was prepared and disclosed for the Original 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 GBV, SEA and SH), prohibition of forced labor and child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	<i>Adopt and disclose the LMP, that was prepared under the Original Project, by the Effective Date, and thereafter implement the LMP throughout Project implementation.</i>	<i>MOH/PIU</i>
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>The Ministry of Health shall maintain, and operate the grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	<i>The Project workers GM established under the Original Project is already operational. Maintain and operate grievance mechanism throughout Project implementation.</i>	<i>MOH/PIU</i>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>The Ministry of Health shall implement adequate occupational, health and safety (OHS) measures including emergency preparedness and response measures in line with the LMP, National Health Care Waste Management Plan, National Infection Prevention &amp; Control Guidelines and WHO guidelines on vaccine-related wastes, consistent with ESS2 and in a manner acceptable to the Bank.</p>	<p><i>OHS measures have been prepared as part of LMP, HCWMP and National IPC guidelines and shall be implemented throughout Project.</i></p>	<p>MOH/PIU</p>
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>WASTE MANAGEMENT PLAN:</b></p> <p>Adopt and implement the National Healthcare Waste Management Plan (NHCWMP) and the site/facility-specific Health Care Waste Management Plan to manage hazardous and non-hazardous medical wastes, consistent with ESS3.</p> <p>Relevant aspects of this standard shall be considered, as needed, including, inter alia, measures to: carry out the purchase, storage, transportation and handling of vaccines in a safe manner and in accordance with the EHSs, and other relevant GIIP including relevant WHO guidelines; and adequately manage and dispose of health care wastes (including wastes produced by the vaccination, such as the large quantum of empty vials, residual vials, used syringes) and other types of hazardous and non-hazardous wastes, all consistent with ESS3.</p>	<p><i>Adopt the NHCWMP prior to the Project Effective Date, and thereafter implement the NHCWMP throughout Project implementation. Adopt and disclose the site/facility-specific HCWMP for the New Redemption Hospital prior to deployment of vaccines and implement throughout Project implementation.</i></p> <p><i>Throughout Project implementation</i></p>	<p>MOH/PIU</p>
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</b></p> <p>Incorporate resource efficiency and pollution prevention and management measures in the site specific ESMPs for sub-projects to be prepared under action 1.2 above.</p>	<p><i>Same timeframe as for the adoption and implementation of the site specific ESMPs for small-scale civil works.</i></p>	<p>MOH/PIU</p>
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY:</b></p> <p>Incorporate measures to manage traffic and road safety risks as required in the site-specific ESMPs to be prepared under section 1.2 above, all consistent with ESS4.</p>	<p><i>Same timeframe as for the adoption and implementation of the ESMPs.</i></p>	<p>MOH/PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.2	<p><b>COMMUNITY HEALTH AND SAFETY:</b> Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, community’s exposure to noise, dust, wastes and pollution due to small-scale civil works, safety of services and community’s exposure to health issues, behavior of Project workers, risks of labor influx, response to emergency situations, and include mitigation measures in the site-specific ESMPs to be prepared under action 1.2 above.</p>	<p><i>Same timeframe as for the adoption and implementation of the ESMPs.</i></p>	<p><i>MOH/PIU</i></p>
4.3	<p><b>GBV, SEA AND SH RISKS</b> The MOH shall update, consult upon, adopt, and implement the GBV, SEA/SH Action Plan to manage the risks of GBV, SEA and SH, all consistent with ESS4.</p> <p>Adopt and implement relevant measures including Codes of Conduct with provisions to prevent and respond to SEA/SH; plans for worker training and accountability; specific measures and procedures as part of the Project GM for confidential and ethical reporting of GBV, SEA/SH incidents; mapping of GBV, SEA/SH service providers in the Project area; community sensitization on GBV, SEA/SH risks and reporting; training of staff from the PIU and MoH on GBV, SEA/SH as part of social risk management; and engagement of a non-governmental organization with experience in GBV, SEA/SH to support the implementation of some of the measures on GBV, SEA/SH, all in accordance with the SEA/SH Action Plan and consistent with ESS4.</p>	<p><i>Update, consult upon, adopt the GBV, SEA/SH Action Plan prior to the Effective Date, and thereafter implement the GBV, SEA/SH Action Plan throughout Project implementation.</i></p> <p>Throughout Project implementation</p>	<p><i>MOH/PIU</i></p>
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<p>RAP Implementation Completion Report for the RAP implemented for clearing and acquisition of the land required for redemption hospital and obtain NO from Association</p>	<p><i>No later than 90days of the project effectiveness</i></p>	
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p>Not relevant. All works will be carried out within the existing footprints of healthcare facilities; hence, this standard is not relevant to the proposed interventions.</p>	<p><i>Not Applicable</i></p>	<p><i>N/A</i></p>
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	<p>Not relevant</p>		
<b>ESS 8: CULTURAL HERITAGE</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
8.1	<p><b>CHANCE FINDS:</b>                      Relevant aspects of Chance Finds Procedure shall be considered, as needed, under action 1.2 above. The Recipient shall incorporate Chance Finds Procedure in site-specific ESMPs prior to the commencement of any civil works.</p>	<p><i>Same timeframe as for the adoption and implementation of the ESMPs</i></p>	<p>MOH/PIU</p>
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
9.1	Not relevant		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b>                      Update, consult upon, disclose, adopt and implement the Stakeholder Engagement Plan (SEP) for the Project, 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.</p>	<p><i>The SEP shall be updated, disclosed, consulted upon, and adopted prior to the Effective Date and thereafter be implemented throughout Project implementation.</i></p>	<p>MOH/PIU</p>
10.2	<p><b>PROJECT GRIEVANCE MECHANISM:</b>                      Establish, publicize, maintain, and operate an accessible grievance mechanism, 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 to the complainants 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 GBV, 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>	<p><i>Strengthen the grievance mechanism established under the Original Project and form new grievance redressal committees, where required, as part of the Project GM within 30 days of the Effective Date and thereafter maintain and operate the GM throughout Project implementation.</i></p>	<p>MOH/PIU</p>
<b>CAPACITY SUPPORT (TRAINING)</b>			



MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
CS1	<p>Prepare a training guide and provide training for PIU staff, stakeholders, communities, Project workers on the following:</p> <ul style="list-style-type: none"> <li>– GBV &amp; SEA/SH</li> <li>– GBV Code of Conduct for project workers</li> <li>– Community health and safety</li> <li>– Healthcare waste management for health facilities</li> <li>– GRM Standard Operating Procedures (SOP) for committee members (roles and responsibilities)</li> </ul>	<p><i>Prepare a training guide within one month of the Effective Date and conduct at least one training session each six months, throughout Project implementation.</i></p>	<p><i>MOH/PIU</i></p>
CS2	<p>Provide training for Project workers on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.</p>	<p><i>During Project implementation</i></p>	<p><i>MOH/PIU</i></p>