

**Government of Sindh
Department of Health**

**Sindh Integrated Health and Population Project
(P 178530)**

Draft

**Environmental and Social Commitment Plan
(ESCP)**

September 17, 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Government of Sindh (the **Borrower**) will implement the Sindh Human Capital Investment: 1000 Days-Integrated Health and Population Project (the **Project**), with the involvement of the Department of Health in collaboration with Population Welfare Department, as set out in the loan agreement. The World Bank (hereinafter the **Bank**) has agreed to provide financing for the Project, as set out in the referred agreement.
2. The Borrower shall ensure that the Project is carried out in accordance with the World Bank Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the World Bank. The ESCP is a part of the Loan 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 Borrower 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 World Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the World Bank.
4. As agreed by the World Bank and the Government of Sindh, 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 Borrower and the World Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the World Bank and the Borrower. The Borrower shall promptly disclose the updated ESCP

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>The Project will 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 E&S management tools /documents required under the ESCP, site observations on contractors performance on implementation of environmental, social and health and safety measures, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>	<p>Quarterly reports prepared and submitted to the Bank on an agreed format not later than 15 days after the end of each quarter. The reporting will be throughout the project implementation.</p>	<p>Project Director Environment and Social Specialists of PMU</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <ol style="list-style-type: none"> 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 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. Subsequently, at the Bank's request, prepare a report on the incident or accident and propose measures to address it and prevent its recurrence. 	<ol style="list-style-type: none"> Notify the World Bank no later than 48 hours after learning of the incident or accident. Provide subsequent report to the Bank within a timeframe acceptable to the Bank. 	<p>Environment and Social (focal person for gender related issues) Specialists of PMU will submit report to the Project Director, as applicable. The Project Director will share the incident and accident reports with the World Bank</p>
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 Bank upon request.</p>	<p>Monthly reports within seven days of end of calendar month and throughout project implementation.</p>	<p>Environment and Social Specialists will receive and review the monthly reports</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <ol style="list-style-type: none"> Project will hire qualified staff and resources to support management of E&S risks including an Environmental Specialist and a Social Specialist (to also act as focal person for gender related issues, total two Specialists) who will support the PMU. Supervision consultant and contractor will appoint qualified E & S Specialist with all necessary material resources, which will support in environmental and social screening, supervision and monitoring including the development of ESMPs etc. as required. Project will execute Third-Party Validation (TPV) exercise for annual monitoring of Environment and Social compliance progress during the Project implementation and will share their report with the bank. 	<p>Within 90 days after Project effectiveness and before issuing first bidding document and first procurement order. This organizational structure, including the specialists, should be maintained throughout Project implementation.</p> <p>Before commencement of the project civil works</p> <p>Annually throughout the project lifecycle</p>	<p>Project Director of PMU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <ol style="list-style-type: none"> 1. PMU will carry out environmental and social assessment to prepare an ESMF, to identify and assess the environmental and social risks and impacts of the Project and suggest appropriate mitigation measures under ESS1 with reference to other relevant ESS specifically ESS2 Labor & Working Conditions, ESS3 Resource Efficiency and Pollution Prevention and Management, ESS4 Community Health & Safety, ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement, and ESS10 Stakeholder engagement and information disclosure. . 2. The preliminary draft SEP will be updated and finalized in accordance with the Environmental and Social Standards (ESSs), submitted to the Bank for approval, and thereafter disclosed. These documents will then be adopted and implemented. 3. In accordance with ESMF, Environmental and Social Management Plans and Environmental and Social Screening Checklists will be prepared for the sub-projects where refurbishment activities will be carried out. These documents will be submitted to the Bank for approval and thereafter disclosed. These documents will then be adopted and implemented. 4. Site-specific instruments for the sub-projects by the contractors (e.g., C-ESMPs) will be developed and implemented, if recommended through the screening checklist 	<ol style="list-style-type: none"> 1. 12 weeks from project effectiveness. Disclosure and Bank Clearance of ESMF, ESMPs, Environmental and Social Screening Checklist (and all E&S documents prepared under ESCP) completed before issuance of any bidding document and prior to commencement of any civil works under the overall Project. 2. To be updated within three months of project effectiveness and submitted to the Bank for approval and thereafter implemented throughout the Project implementation. 3. Disclosure and Bank Clearance of subproject level instruments as required completed before issuance of any bidding document and prior to commencement of any civil works under any of its Sub-Projects. 4. Where required, the site-specific instruments (C-ESMPs) for the Sub Projects will be developed prior to commencement of physical work and will be approved by the Bank. Once approved, the ESMPs will be disclosed and implemented throughout the construction /refurbishment activity. 	<p>Environment Specialist and Social Specialist (also acting as gender focal person) under the guidance of Project Director.</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	<p>PERMITS, CONSENTS AND AUTHORIZATIONS</p> <ol style="list-style-type: none"> Obtain or assist in obtaining as appropriate, the permits, consents and authorizations that are applicable to the project from national regulatory authorities. Comply or cause to comply as up to date with the conditions as established in these permits, consents, and authorizations throughout project implementation. 	Before launching the bidding process and start of construction activities, as applicable.	Project Director of PMU
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <ol style="list-style-type: none"> Incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, and the Labor Management Procedures, and code of conduct into the procurement documents with contractors. Thereafter ensure that the contractors comply with the ESHS specifications of their respective contracts. Department of Health will monitor Contractor commitment and compliance and ensure contractors provide details on contractor's oversight on environmental, social, health and safety (ESHS) performance, recruit qualified E&S staff and ensure compliance as per ESCP requirements. 	<ol style="list-style-type: none"> As part of the preparation of procurement documents and respective contracts. Contractors' supervision on implementation of ESCP, ESHS and all other relevant E&S requirements to continue throughout project implementation. 	<ol style="list-style-type: none"> Environment and Social Specialists with support from Procurement Specialist. Environment and Social Specialist under the supervision of the Project Director.
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Develop, adopt and implement a Labor Management Procedure for the Project, including provisions on working conditions, management of workers relationships, occupational health and safety measures (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, and relevant requirement for primary supplier including a dedicated grievance mechanism for project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p>	Immediately after project effectiveness and prior to any procurement of services or goods and engagement of any project workers . Supervision of implementation of LMP throughout the Project	Social Specialist will conduct this exercise under the supervision of Project Director and with support from Environmental Specialist

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. The PMU will monitor the implementation of grievance redressal mechanisms established by the Contractors</p>	Immediately after project effectiveness, Grievance Mechanism operational prior to engaging any project workers and maintained throughout Project implementation.	Environmental Specialist and Social Specialist (also acting as gender focal person) under supervision of Project Director
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>HEALTHCARE WASTE MANAGEMENT PLAN:</p> <p>Prepare healthcare waste management plan and implement the measures for healthcare waste management. These measures will be in line with the provisions of the Sindh Hospital Waste Management Rules 2014.</p>	Prepared within 12 weeks from project effectiveness and will require prior approval from the Bank.	Environment Specialist of PMU under the supervision of Project Director
3.2	<p>E-WASTE MANAGEMENT</p> <p>Prepare, adopt, and implement Standard Operating Procedures (SOPs) for collecting and managing E-Waste. These SOPs will be approved by Sindh Environmental Protection Agency (EPA).</p>	Prepared within 12 weeks from project effectiveness and will require prior approval from the Bank.	Environment Specialist of PMU with the help of procurement specialist under the supervision of Project Director
3.3	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:</p> <ol style="list-style-type: none"> Resource efficiency and pollution prevention and management measures will be covered under the environmental and social management framework, site specific ESMPs and the Environmental and Social Screening Checklist to be prepared under action 1.2 above. The Borrower will ensure incorporation of pollution control compliance, i.e., compliance with applicable emission standards and mitigation measures as developed in relevant E&S documents in the CESMP. Provisions for procurement of energy-efficient equipment will be included in the contract. 	Prepared within 12 weeks from project effectiveness and will require prior approval from the Bank, and once approved, will apply throughout Project implementation	<ol style="list-style-type: none"> Environment Specialist of PMU under the supervision of Project Director. Supervision Consultants and the Contractor. Environment Specialist of PMU under the supervision of Project Director.

ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY: Prepare, adopt and implement measures and actions to assess and manage traffic and road safety risks as part of ESMF and ESMPs to be developed under action 1.2. This will be applicable for ambulance subcontractor under component 1.1 "ambulance services for referral" as well.	Prepared within 12 weeks from project effectiveness and will require prior approval from the Bank, and once approved, will apply throughout Project implementation. As part of in Environmental and Social Screening Checklist for all subprojects, to be included as part of bidding documents for repair/rehabilitation works.	Environment Specialist of PMU under the supervision of Project Director Contractors at the repair/rehabilitation Stage
4.2	COMMUNITY HEALTH AND SAFETY: As part of the ESMF (and where applicable, ESMP / C-ESMP), develop and implement measures to manage and mitigate risks to community health and safety including risks associated with natural and man-made disasters (floods, fire, etc.), construction activities (dust, noise, exposure to strangers, etc.), harassment, extortion, culturally inappropriate behavior, etc.	Prepared within 12 weeks from project effectiveness and will require prior approval from the Bank, and once approved, will apply throughout Project implementation As part of ESMP (and C-ESMP) for all subprojects, to be prepared prior to issuance of bidding documents for civil works and to be approved by the Bank.	Social Specialist of the PMU Supervision Consultants Contractors at the Construction Stage
4.3	SEA AND SH RISKS: Prepare, adopt, and implement a stand-alone SEA/SH assessment and action plan , to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA).	Prepared within 12 weeks from project effectiveness and will require prior approval from the Bank, and once approved, will apply throughout Project implementation.	1. Social Specialist as the gender focal person of the project, with the help of a GBV Expert (consultant) 2. Project Director
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT PLANS Develop and implement a resettlement action plan (RAP) / abbreviated action plan / livelihood restoration plan for each activity under the Project for which the environmental and social screening requires such an instrument, as set out in the ESMF, and consistent with ESS5.	Respective instrument to be developed, approved, and disclosed before any displacement takes place, ensuring that before displacement, full compensation has been provided and displaced people have been resettled.	Social Specialist at the PMU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			

ESS 6 is not relevant to the Project			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
ESS 7 is not relevant to the Project			
ESS 8: CULTURAL HERITAGE			
ESS 8 is not relevant to the Project			
ESS 9: FINANCIAL INTERMEDIARIES			
ESS 9 is not relevant to the Project			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION		
	Update, adopt and implement a 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.	<ol style="list-style-type: none"> 1. Preliminary SEP will be updated within 90 days of Effectiveness Date and then bi-annually during the course of the Project implementation. 2. Maintained throughout implementation and reported bi-annually to the World Bank. 	<ol style="list-style-type: none"> 1. Social Specialist with support from Project Director 2. Environment and Social Specialist under the supervision of Project Director.
10.2	PROJECT GRIEVANCE MECHANISM:		
	<p>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 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>	<p>Within 60 days of project effectiveness and before issuing first bidding document and first procurement order, notwithstanding the status of SEP at the time. For the first 60 days of the project, till the project level GRM as described in SEP is set-up and operationalized, the project will adopt the existing complaints resolution mechanism being used by the provincial health department at the district and provincial level.</p>	<p>Project Director with support of Environment Specialist and Social Specialist (also acting as the gender focal person)</p>

CAPACITY SUPPORT (TRAINING)			
CS1	<p>PMU staff, Contractor’s training may be required in:</p> <ul style="list-style-type: none"> • General environmental and social awareness • Community and occupational health and safety aspects and key risks including COVID-19 response • Stakeholder Engagement and mapping • Environmental and Social Screening Checklist • Emergency Response Preparedness • Disaster Risk Reduction, Response and Management • Monitoring and Reporting • Mitigation against Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) and Violence Against Children (VAC) • Gender sensitivity • Social Inclusion • Waste Management • Documentation and Reporting • Labor Management Procedures • Grievance Redress Mechanisms 	<p>Prior to initiation of project activities and then conducted periodically throughout project implementation.</p>	<p>Environment Specialist, Social Specialist in PMU.</p> <p>Environment Specialist and Social Specialist of supervision consultants.</p>
CS2	<p>Training for Project workers:</p> <ul style="list-style-type: none"> • Code of conduct/ Behavioral Standards • Safe and defensive driving • Management of hazardous substances • Housekeeping, hygiene and waste disposal and pollution prevention and control • Handling and management of E-Waste • Healthcare waste management • Labor Management Procedures • Occupational Health and Safety • Emergency Response Preparedness • Community Health and Safety • Grievance Redress Mechanisms 	<p>Prior to initiation of project activities and then conducted periodically throughout project implementation.</p> <p>During Implementation, prior to operationalization of ambulance services/health care services and conducted periodically throughout project implementation</p> <p>During implementation for e-waste management</p>	<p>Contractors’ EHS Staff</p> <p>Environment Specialist, Social Specialist in PMU.</p>