

MINISTRY OF HEALTH AND FAMILY WELFARE (MoHFW)

GOVERNMENT OF BANGLADESH

**Health and Gender Support Project (HGSP)
(P 171648)**

**DRAFT ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

NOVEMBER 05, 2019

Acronyms and Abbreviations

CC	-	Community Clinic
CEC	-	Certificate on Environmental Clearance
CXB	-	Cox's Bazar
DSH	-	District Sadar Hospital
E&S	-	Environmental and Social
ESCP	-	Environment and Social Commitment Plan
ESA	-	Environment and Social Assessment
ESHS	-	Environmental, Social, Health and Safety
ESIA	-	Environmental and Social Impact Assessment
ESMP	-	Environmental and Social Management Plan
ESS	-	Environmental and Social Standard
FDMN	-	Forcibly Displaced Myanmar National
GBV	-	Gender Based Violence
GOB	-	Government of Bangladesh
HGSP	-	Health and Gender Support Project
HNP	-	Health Nutrition and Population
HORMP	-	Human and Occupational Resources Management Procedures
IA	-	Implementing Agency
LMP	-	Labor Management Plan
MoHFW	-	Ministry of Health and Family Welfare
MoWCA	-	Ministry of Women and Children Affairs
MWMP	-	Medical Waste Management Plan
MWHMMP	-	Medical Waste and Hazardous Material Management Plan
MoDMR	-	Ministry of Disaster Management and Relief
NGO	-	Non-Governmental Organization
OHS	-	Occupational Health and Safety
PIU	-	Project Implementation Unit
RAB	-	Rapid Action Battalion
RAP	-	Resettlement Action Plan
RPF	-	Resettlement Policy Framework
SEA	-	Sexual Exploitation and Abuse
SEP	-	Stakeholders Engagement Plan
UFWC	-	Union Family Welfare Center
UzHC	-	Upazila Health Complex
USD	-	United States Dollar

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

1. The Government of Bangladesh (**GoB**) will implement the Health and Gender Support Project (**HGSP**) (the **Project**), with the involvement of Ministry of Health and Family Welfare (**MoHFW**). The International Development Association (**IDA**) (hereinafter the **Bank**) has agreed to provide financing for the Project.
2. The GoB through MoHFW 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. MoHFW will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Management Plan (**ESMP**), Medical Waste Management Plan (**MWMP**), Solid and Liquid Waste Management Plan (**SLWMP**) Stakeholder Engagement Plans (**SEP**), Human and Occupational Resources Management Procedures (**HORMP**) and the timelines specified in those E&S documents.
4. MoHFW 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 Bank by MoHFW as required by the ESCP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Bank and MoHFW, 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, MoHFW will agree to the changes with the Bank 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 Bank and the MoHFW. The MoHFW will 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 MOHFW and the World Bank (WB) will jointly review the situation and come to a consensus with respect to provision of additional funding, if needed, to implement actions and measures to address such risks and impacts, which may include relevant environmental and social risks (including, but not limited to health and safety impacts, labor influx, Gender Based Violence (GBV) etc).

**HEALTH AND GENDER SUPPORT PROJECT (HGSP) IN COX'S BAZAR (CXB) DISTRICT
ENVIRONMENT AND SOCIAL COMMITMENT PLAN (ESCP)**

SL. NO.	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
A	<p>REGULAR REPORTING</p> <p>The MoHFW (Implementing Agency, IA) will prepare and submit to the Bank, regular monitoring reports on 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 documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	<p>Half yearly, reporting throughout the Project implementation</p>	<p>Implementing Agency (IA)</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>The IA will 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 cases of GBV/SEA, serious mismanagement in handling medical waste, security breach, death/disability or any incident or accident from the construction activities as would be executed by the Contractor etc. IA will provide sufficient detail regarding 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 supervising entity, as appropriate. Subsequently, as per the Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Notify the Bank within 24 hours of learning of the occurrence of such accidents or incidents. A report on action taken to be provided on the same by 07 (Seven) days to the Bank.</p>	<p>IA</p>
<p>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</p>			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>The IA will recruit an Environmental Specialist (ES) – responsible for addressing environmental risks/impacts, addressing health and safety issues as well as medical waste management issues, a Social Development Specialist (SDS) – responsible for addressing risks associated with social issues (Labor, Small Ethnic Communities, OHS) and a Gender Specialist (GS) – responsible for addressing gender (especially GBV) issues, with qualifications, experience and under terms of reference satisfactory to the Bank. Further, the capacity of health care staffs at health facilities to implement various waste management plans will be assessed</p>	<p>Recruitment process of these 3 (three) specialists (ES, SDS and GS) will start within 45 days of Project effectiveness who will put intermittent inputs.</p>	<p>IA</p>

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	and training will be provided to deal/ management of medical, solid and liquid wastes.		
1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT</p> <p>The IA already has carried out the Environmental and Social Assessment (ESA) of the Project to identify and assess the environmental and social risks and impacts of the project and appropriate mitigation measures. The IA will update, adopt, and implement, the ESA, in a manner acceptable to the Bank. The ESA includes ESMP, MWMP and SLWMP.</p>	The IA will implement the mitigation measures contained in the ESA throughout the Project implementation.	IA
1.3	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>The IA require the adoption and implementation project specific Environmental and Social Management Plan (ESMP) by various implementing entities such as UN agencies, health facilities, contractors, including following instruments in a manner acceptable to the Bank:</p> <ul style="list-style-type: none"> ▪ Medical Waste Management Plan (MWMP) ▪ Solid and Liquid Waste Management Plan (SLWMP) ▪ GBV Risk Assessment ▪ Human and Occupational Resources Management Procedures (HORMP) ▪ Stakeholder Engagement Plan (SEP) <p>Since there is no land acquisition, no squatters have been found in the project areas and the small minor ethnic communities in the area will not be affected therefore RAP and IPP are not required.</p>	The instruments require Bank's prior review and approval before launching of the bidding process. Once approved, the instruments will be implemented throughout the project.	IA
1.4	<p>MANAGEMENT OF CONTRACTORS</p> <p>The IA will incorporate the relevant aspects of the ESCP, including the relevant E&S documents and/or plans, and the Human and Occupational Resources Management Procedures (HORMP), into the Environmental, Social, Health and Safety (ESHS) specifications of the respective procurement documents with contractors. IA will thereafter, ensure that the contractors comply with the ESHS specifications of their respective contracts.</p>	Prior to the preparation of procurement documents. IA will Supervise contractors throughout Project implementation	IA
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES	HORMP will be administered and implemented throughout project implementation period.	IA

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	The IA will administer a Human and Occupational Resources Management Procedures (HORMP) consistent with national legislation and ESS-2. The IA will ensure that the HORMP is updated, adopted and implemented when required		
2.2	GRIEVANCE REDRESS MECHANISM (GRM) FOR PROJECT WORKERS The IA will establish, maintain, and operate a GRM for the Project which will include issues of Project workers, as described in the HORMP and consistent with ESS-2.	GRM will be operational prior to project appraisal and maintained throughout the Project period.	IA
2.3	OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES The IA will prepare, adopt, and implement occupational, health and safety (OHS) measures as will be specified in the ESMP and the bid document (Section 1.3 and 1.4).	Same timeframe as for the preparation and implementation of the ESMP	IA
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT The IA will ensure that an ESMP, a Medical Waste Management Plan (MWMP) and Solid and Liquid Waste Management Plan (SLWMP) are prepared, adopted and implemented in every tier of health care provision in the project area. The IA will also ensure sustainable design for minor renovating/ constructing existing/new community clinics.	The plans have been developed and will be implemented throughout the Project period	IA
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Not relevant	NA	NA
4.2	COMMUNITY HEALTH AND SAFETY The IA will prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers, response to emergency situations, community health & safety, handling of hazardous material and wastes etc and include these measures in the ESMPs to be prepared in a manner acceptable to the Bank.	Same timeframe as for the preparation and implementation of the ESMP	IA
4.3	GBV AND SEA RISKS The IA will prepare, adopt, and implement a Project Grievance Redress Mechanism (GRM), which, besides others will also manage the risks of GBV and Sexual	Project GRM will be established and operational throughout Project implementation	IA

SL. NO.	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
	Exploitation and Abuse (SEA) based on GBV risk rating of this project (this project has been categorized as a “low” risk project with regards to GBV risks caused and/or contributed by the project activities).		
4.4	GBV RISKS DURING PROJECT IMPLEMENTATION The IA will utilize the project’s components on GBV response services to implement measures to address GBV and SEA risks and impacts that may arise during Project implementation. Project GRM, besides others, will address the issue of GBV specific GRM.	As and when required	IA
4.5	SECURITY PERSONNEL In case security personnel are deployed, the IA will prepare, adopt, and implement a stand-alone Security Personnel Management Plan consistent with the requirements of ESS4, in a manner acceptable to the Bank	Prior to engaging security personnel and thereafter implemented throughout the Project	IA
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT PLANS The project will not require any land acquisition. Further, during ESA preparation no squatters were found to be located on the health facilities lands identified for the project. According to the ESA, the need for the preparation of a resettlement instrument such as RAP or ARAP is not envisaged. In case the need for resettlement arises at a later stage, appropriate resettlement instruments will be prepared and duly implemented.	No resettlement instruments are required to be prepared since the Project will not require land acquisition and no squatters were found to be adversely affected by the Project activities	IA
5.2	GRIEVANCE REDRESS MECHANISM If any resettlement is required, the project specific GRM will be utilized to address resettlement-related grievances developed based on guidelines described in the SEP and sub-section 10.2 of this ESCP.	<i>(In case resettlement is required at a later stage)</i> Prior to commencement of resettlement activities and maintained throughout Project Implementation	IA
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Not relevant	NA	IA
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			

SL. NO.	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/ AUTHORITY
7.1	INDIGENOUS PEOPLES PLAN CXB district has few small ethnic and religious minority communities. The ethnic minority communities in the project sub-districts have been identified through extensive consultation while the ESA was conducted. Since the project will not affect these people, an IPP is not required. However, in the unlikely event during project execution that any of these ethnic people are affected, appropriate consultations will be carried out, an appropriate instrument will be prepared and agreement/ consent will be obtained, in a manner that is fully cognizant of sociocultural and religious sensitivities.	In an unlikely event that ethnic people end up being affected, appropriate instruments will be prepared and implemented in keeping with the requirement of ESS 7	IA
7.2	GRIEVANCE REDRESS MECHANISM During project implementation, in case of unlikely event of these ethnic people being affected the Project GRM will be adhered to	In case it is required, ethnic people may resort to grievance submission through Project GRM	IA
ESS 8: CULTURAL HERITAGE			
8.1	No cultural heritage is envisaged to be adversely affected by Project activities. A chance finds procedure will be included in works contracts requiring contractors to stop construction if cultural heritage is encountered during any work and to notify and closely coordinate with relevant mandated country authority for the salvaging and restoration of such cultural heritage.	During preparation of bid document	IA
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	Not relevant to the HGSP	NA	
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN (SEP) PREPARATION AND IMPLEMENTATION The IA has prepared a draft SEP. It will be updated, adopted and implemented.	Will be submitted for Bank's approval before Appraisal and will be implemented throughout the Project once approved	IA
10.2	PROJECT GRIEVANCE REDRESS MECHANISM (GRM) The IA will prepare, adopt, maintain and operate a Project GRM, as described in the SEP.	Will be submitted for Bank's approval along with SEP and will be implemented throughout the Project once approved	IA

CAPACITY DEVELOPMENT SUPPORT (TRAINING)		
Specify Training to be provided	Targeted Groups and Timeframe	Training Completed
The IA, with support of third-party resources as needed (independent experts, NGOs, etc will design and implement training for targeted groups involved in the Project to improve their awareness of risks and mitigate the impacts of the HGSP. This ESCP proposes a preliminary training plan covering the following topics. This plan will be adapted to meet needs during Project implementation.		
ESF. Training on ESF and the 10 ESSs—including preparation of ESMP	Personnel directly related with project at MoHFW and MoWCA	Prior to Project effectiveness
Occupational Health and Safety Module: <ul style="list-style-type: none"> • ESMP implementation • Personal protection equipment • Workplace risk management • Prevention of accidents at work sites • Health and safety rules • Solid and liquid waste management • Medical waste management • Preparedness and response to emergency situations 	<i>Officials of DSH, UzHCs, UFWC, CC, LGI, Locally active NGOs, Civil Work Contractors, Health care workers</i>	Prior to the Project effectiveness and continue half yearly throughout the project
Labor and Working Conditions <ul style="list-style-type: none"> • Terms and conditions of employment according to national working laws and regulations • Contractor and sub-contractor codes of conduct • Worker’s organizations • Child labor and minimum age employment rules 	<i>IA Local officials, Contractors Health Safety Officer, Labor Sardars (Leaders)</i>	Prior to the Project effectiveness
Grievance Redress Mechanism Module , design and production of a training module addressing the following aspects: <ul style="list-style-type: none"> • Registration and processing procedure • Grievance redress procedure • Documenting and processing grievances • Use of the procedure by different stakeholders 	ES, SDS, GS, Local Governments, Civil Society, Local NGOs working with host population and FDMNs, Contractors, representatives from DSH, UzHC and UHFPWC	Prior to Project effectiveness and thereafter once every six months
Medical, Solid and Liquid Waste Management: <ul style="list-style-type: none"> ▪ Information about the risks, along with health and safety advice, see the World Bank Group Environmental Health and Safety Guidelines on managing healthcare institutions and the relevant international good practices ▪ Basic knowledge about handling procedures and risk management 	All medical staffs and waste handlers at DSH, UzHC	Prior to Project effectiveness and thereafter yearly

<ul style="list-style-type: none"> ▪ Using protective and safety equipment ▪ Information about the waste sorting process ▪ Safe procedures for managing waste in dumps ▪ Emergency and rescue measures 		
<p>GBV Risk Module</p> <ul style="list-style-type: none"> ▪ Raising awareness and measures to prevent and mitigate GBV risks ▪ The topics, activities and targeted groups will be developed included in the Project GRM 	<p>IA Local officials, Contractors Health Safety Officer, Labor Sardars (Leaders), Local NGOs, OCC Staffs</p>	<p>Prior to Project effectiveness and thereafter yearly</p>