

**The Republic of The Gambia
Ministry of Health**

ADDITIONAL FINANCING

THE GAMBIA ESSENTIAL HEALTH SERVICES STRENGTHENING PROJECT (P177263)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Updated October 16, 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of The Gambia will implement the ADDITIONAL FINANCING for THE GAMBIA ESSENTIAL HEALTH SERVICES STRENGTHENING PROJECT (P177263) (the **Project**), with the involvement of the following ministries/agencies/units: Ministry of Health (MOH), Ministry of Transportation, Works and Infrastructure (MOTWI), Ministry of Environment, Climate Change and Natural Resources (MECCNAR), and National Environmental Agency (NEA). The International Bank for Reconstruction and Development and/or International Development Association (the **Association**) has agreed to provide financing for the Project.
2. The Republic of The Gambia 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, specific documents or plans, as well as the timing for each of these.
3. The Republic of The Gambia will also comply with the provisions of the following environment and social (E&S) documents required under the Environment and Social Framework (ESF) and referred to in this ESCP: Environmental and Social Management Framework (ESMF), Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), Health Care Waste Management Plan (HCWMP) and the timelines specified in those E&S documents.
4. The Republic of The Gambia 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 Republic of The Gambia as required by the ESCP and the conditions of the legal agreement. The Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. The project will have positive impacts on improving the utilization and quality of essential health services. However, the project could also cause environmental and social risks, clustered around the civil works, the generation of healthcare waste and the introduction of electronic medical records and electronic civil registration and vital statistics system which will require data privacy and protection. Five Environmental and Social Standards have been triggered, for which appropriate instruments will be developed before civil works commences. The overall risk classification is moderate.
7. As agreed by the Association and the Republic of The Gambia, 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 Republic of The Gambia will 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 will promptly disclose the updated ESCP.
8. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the Republic of The Gambia 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	<p>REGULAR REPORTING: Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project as described in the ESMF. This shall include the following elements: stakeholder engagement activities, functioning of the grievance mechanism(s), health care waste management, labor management, activities related to asbestos disposal and supervision of each hospital construction as required in each hospital ESMP.</p>	Quarterly reports from the MOH to the WBG	Program Coordination Unit (PCU) of the MOH,
B	<p>INCIDENTS AND ACCIDENTS: 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 as well as any SEA/SH-related incidents in accordance with appropriate reporting procedures for these types of cases. Provide initial report within 48 hours describing the incident and actions taken. Subsequently prepare a detailed report on the incident or accident and propose any measures to prevent its recurrence.</p>	Notify the WBG TTL within 48 hours after learning of the incident or accident with an initial report. A detailed report will be submitted within 30 days.	PCU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE: The MOH PCU for this Project was established for the recently approved MOH COVID-19 Preparedness and Response project. The PCU Senior Operations Officer will ensure all environmental and social instruments are prepared and complied with, oversee coordination with all appropriate authorities and contractors and incorporate E&S issues and results in Project monitoring, evaluation and reporting. Key support will also be provided by the MOH Environmental Health Program Manager and Health Communications Manager, and a MOH Environmental and Social consultancy firm that prepares all ESMP documents and oversees all construction. In addition, the MOH SEA/SH/GBV is responsible for overseeing all SEA/SH requirements to ensure that the project is completed in accordance with environmental and social standards.</p>	Throughout project implementation	PCU

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS:</p> <p>a. Update and disclose the ESMF, prepared under the Parent Project, to assess the environmental and social risks and impacts of Project activities with mitigation measures in accordance with ESS1. The ESMF incorporates the Health Care Waste Management Plan and its Standard Operating Procedures (SOPs).</p> <p>b. Prepare, disclose, and implement ESMPs for the additional rehabilitation and construction subprojects.</p> <p>c. Incorporate the relevant aspects of this ESCP, including, inter alia, any ESMPs 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>a. ESMF updated before completion of Appraisal.</p> <p>b. ESIA and RAP for emergency treatment center disclosed and implemented before start of construction. All ESMPs for renovations approved before construction activities.</p> <p>c. Before launching the procurement process for the relevant Project activities and thereafter throughout the carrying out of such activities.</p>	<p>PCU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT: Key issues to be addressed in the LMP include terms and conditions of employment, nondiscrimination and equal opportunity, as well as Occupational Health and Safety (OHS). The LMP, included in the ESMF, describe how Project workers will be managed in accordance with the requirements of national law and the ESS2. Due diligence is also described in the ESMF to ensure Borrower meets requirements on child labor, forced labor and occupational health and safety apply to employees of the MOH and all contractors and subcontractors. Civil servants will be bound by their public sector contracts, unless their contract has been transferred to the Project. The LMP includes measures to ensure that labor is provided on a voluntary basis and will further ensure that the health and safety of workers, especially women, are given adequate attention.</p>	The LMP included in the ESMF shall be updated, if necessary, before completion of Appraisal, and be implemented throughout project duration.	PCU
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS: A grievance mechanism is provided for all direct workers and contracted workers to raise workplace concerns. It is part of the LMP in the ESMF.</p>	Update, if necessary, and implement the grievance mechanism throughout project duration.	MOH, the Republic of The Gambia (PCU)

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>ENERGY EFFICIENCY: Each of the Project hospital renovation plans shall contain an assessment of energy efficiency improvements as part of the ESMP.</p>	Throughout Project implementation	PCU
3.2	<p>AIR EMISSIONS: During the four hospital renovations, all construction and/or retrofitting shall be undertaken observing appropriate health and safety measures for workers and all hospital staff and patients. The construction of the Emergency Treatment Centre Intensive Care Unit, the Emergency Observation and Treatment Centre, the Public Health Laboratory and Training Centre, the Blood Transfusion Centre, and Conference Centre at Farato and the construction of the new neonatal ward at Edward Francis Small Teaching Hospital will observe measures to reduce and ensure minimal particulate/dust impacts or health risks. All of these provisions will be detailed in the ESMFs and ESCOPs that will be updated</p>	Throughout Project implementation	PCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.3	<p>INFECTION CONTROL AND MEDICAL WASTE MANAGEMENT: To operationalize the Health Care Waste Management (HCWM) plan, the MOH has developed HCWM Standard Operating Procedures (SOP) as detailed in the ESMF. Each of the Project healthcare facilities will prepare Waste Management Plans to prevent or minimize such adverse impacts based on World Health Organization (WHO) COVID-19 guidance documents, and other ESCOP also include guidance related to transportation and management of samples and medical goods or expired chemical products, as well as small scale rehabilitation activities.</p> <p>MANAGEMENT OF ACTIVITIES RELATED TO ASBESTOS DISPOSAL: The PCU, in collaboration with the MOH and NEA, will develop Asbestos Remedial Action Plan that will be applicable to all HCF renovations.</p>	<p>Throughout Project implementation</p> <p>Prior to the start of any Health Care Facility renovation activity and throughout Project implementation</p>	<p>PCU</p> <p>PCU</p>
ESS 4: COMMUNITY HEALTH AND SAFETY			
	<p>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 labor influx; and Implement the SEA/SH Action Plan</p>	<p>Throughout project implementation</p>	<p>PCU</p>
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
	<p>This standard is indirectly relevant as resettlement planning is conducted under the COVID Project, and the RAP developed for that project also applies to the construction of the National Medical Center in Farato.</p>	<p>No construction activities for the Farato Medical Center will take place until the RAP for the COVID Project has been approved, disclosed and implemented, including the payment</p>	<p>PCU</p>

		of compensation.	
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	<p>This standard is relevant. Indeed, the Kabafita Forest Park is a wooded savanna of approximately 243 hectares, adjacent to the Farato National Emergency Treatment Center site. As the forest park is unfenced, there will be potential impacts during construction and operation on the biodiversity of the park if control mechanisms are not implemented to prevent encroachment, illegal dumping of waste and forest fires.</p> <p>The ESIA being prepared under the COVID project will be approved prior to the start of construction of the National Medical Center.</p>	Prior to the start of civil works for the Farato Medical Center	PCU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Not relevant		
ESS 8: CULTURAL HERITAGE			
	Not relevant		
MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 9: FINANCIAL INTERMEDIARIES			
	Not relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN: Update, disclose and implement the SEP consistent with ESS10, in a manner acceptable to the Association.</p>	The SEP has been updated, and will be publicly disclosed prior to appraisal, and implemented during the life of the project.	PCU
10.2	<p>GRIEVANCE MECHANISM: Update and continue to operate the Grievance Mechanism, consistent with ESS10, in a manner acceptable to the Association. This mechanism also includes a special channel for handling complaints related to issues of gender-based violence, SEA/SH, and VAC. It should include several accessible and safe entry points, including access to communicate in local languages.</p>	Grievance Mechanism has been updated as part of SEP in October 2021 and will be operational throughout Project Implementation.	PCU
CAPACITY SUPPORT (TRAINING)			

	<p>The ESMF capacity building section is directed to staff in the MOH, relevant government institutions, contractors and subcontractors, and communities. Six workshop topics will be conducted in partnership with the COVID-19 project. Each workshop has a designated target audience, a time frame for delivery and identification of who will facilitate the workshop. A budget estimate is also allocated. Based on social distancing protocols and COVID-19 precautions, these workshops can be delivered via remote connections and distance learning.</p>	<p>Throughout project implementation</p>	<p>PCU</p>
--	--	--	------------