



**Government of Sierra Leone
Ministry of Health and Sanitation**

**Sierra Leone COVID-19 Emergency
Preparedness and Response Project
Additional Financing (P176441)**

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

May 10, 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Sierra Leone (hereinafter **Recipient**) shall implement the Sierra Leone COVID-19 Emergency Preparedness and Response Project Additional Financing (the **Project**), with the involvement of the Ministry of Health and Sanitation (**MoHS**) through the Emergency Operations Center (EOC) and Expanded Program for Immunization (EPI) of the MoHS. The International Development Association (hereinafter the **Association**) has agreed to provide additional financing for the Project, co-financed by the Health Emergency Preparedness and Response Trust Fund (HEPRTF) of US\$3.5 million.
2. The Recipient shall carry out the Project in accordance with the Environmental and Social Standards (**ESSs**). To this end, this Environmental and Social Commitment Plan (**ESCP**) sets out material measures and actions to be carried out or caused to be carried out by the Recipient, including the time frame of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, grievance management and the environmental and social assessments and instruments to be prepared or updated, disclosed, consulted, adopted and implemented under the ESCP and the ESSs, all in a manner acceptable to the Association.
3. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Association by the Recipient as required by the ESCP and the provisions of the Financing Agreements and the Grant Agreement.
4. As agreed by the Association and the Recipient, 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 Recipient/ *or delegate(s)* shall update the ESCP to reflect the agreed-upon changes. Agreement on changes to the ESCP shall be documented through an exchange of letters signed between the Association and the Recipient/ *or delegate(s)*. The Recipient/ *or delegate(s)* shall promptly disclose the updated ESCP.
5. Where the scope of the Project changes, unforeseen circumstances occur, or Project performance result in changes to the risks and impacts during Project implementation, the Recipient 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	REGULAR REPORTING: 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, stakeholder engagement activities and grievances log.	Quarterly throughout Project implementation	MoHS
B	INCIDENTS AND ACCIDENTS: The recipient shall 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, any COVID-19 outbreak in the Project area. The recipient shall 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 Association's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.	Notification to the Association should take place within 48 hours and shall occur no later than 72 hours after becoming aware of the incident or accident. Report to be prepared and submitted to the Association on timeframe specified by the Association	MoHS
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE: The EOC and EPI under the MoHS shall maintain the environmental and social safeguards unit within IHPAU with qualified staff and resources to support management of ESHS risks and impacts of the Project, including (i) an environmental, health and safety specialist; (ii) a social specialist and an environmental and social advisor. These environmental and social (E&S) Specialists shall be responsible for managing the E&S risks of the Project and ensuring that the Project is implemented in accordance with this ESCP. EOC and EPI has established a COVID-19 vaccine multidisciplinary team for vaccine registration and vaccine safety monitoring systems. District EOC and District Health Management Teams (DHMTs) are conducting microplanning at the district and community levels. EOC shall ensure that the National COVID-19 technical working and various coordinating pillars follow the Project's ESMF and comply with all relevant ESSs.	Hiring of the Environmental, health and safety specialist and social specialists is completed. The specialist shall be maintained throughout Project implementation EOC COVID-19 multidisciplinary team shall be in place prior to undertaking the vaccine campaign for the AF.	MoHS

<p>1.2</p>	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS</p> <p>a. Assess the environmental and social risks and impacts of proposed Project activities, including to 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 in accordance with the Environmental and Social Management Framework (ESMF) to be prepared, disclosed, consulted and adopted for the Project, the ESSs, the Environmental, Health and Safety Guidelines (EHSs), and other relevant Good International Industry Practice (GIIP), including relevant WHO guideline. The ESMF will be based on an updated version of the ESMF of the parent COVID-19 Project (P173803). The ESMF will also include a medical waste management plan as part of the ESMP. Specifically, for the AF, EPI has conducted Cold Chain assessment, Vaccine Introduction Readiness Assessment and Vaccine Readiness Assessment Framework and will strengthen the cold chain system before the start of the campaign.</p> <p>b. Prepare, disclose, consult, adopt, and implement any environmental and social management plans (e.g. health-care waste management plans), instruments or other measures required for the respective Project activities based on the assessment process, in accordance with the ESSs, the ESMF, the EHSs, and other relevant GIIP, including relevant WHO guidelines (such as Laboratory Biosafety Guidance related to the novel coronavirus (2019-nCoV); procurement, storage and distribution of COVID-19 vaccines; repatriation and quarantine of travelers in relation to the COVID-19 outbreak; Code of Ethics and Professional Conduct; Fair Allocation Framework; WHO guidelines on Risk Communication and Community Engagement; Infection Protection and Control (IPC)/water, sanitation and hygiene (WASH) and any other relevant guidelines in a manner acceptable to the Association) to, inter alia, ensure access to and allocation of Project benefits in a fair, equitable and inclusive manner, taking into account the needs of individuals or groups who, because of their particular circumstances, may be disadvantaged or vulnerable, including, with regards to vaccines.</p> <p>c. Incorporate the relevant aspects of this ESCP, including, inter alia, the ESMF, any environmental and social management plans 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>d. Adopt procedures, protocols and/or other measures to ensure Project beneficiaries that receive vaccines under the Project do so under a program that does not include forced vaccination and is acceptable to the Association, as set out in the ESMF.</p>	<p>a. The ESMF for the parent project (SL COVID-19 Emergency Preparedness and Response Project: P173803) shall be updated for Additional Financing (P176441), <i>disclosed, consulted and adopted before the Effective Date.</i></p> <p>b. Plans or instruments prepared, disclosed, consulted and adapted before carrying out of the relevant activities, and thereafter implemented throughout the carrying out of such activities.</p> <p>c. The relevant ESHS measures shall be incorporated into the procurement documents before launching the procurement process for the relevant activities and shall thereafter be complied with throughout the carrying out of such activities.</p> <p>d. Before the carrying out of the relevant Project activities, and thereafter implemented throughout the carrying out of such activities</p>	<p>MoHS</p>
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1.3	<p>EXCLUSIONS: The following type of activities shall not be eligible for finance under the Project:</p> <ul style="list-style-type: none"> • Activities that may cause long term, permanent and/or irreversible (e.g., loss of major natural habitat) adverse impacts; • Activities that have high probability of causing serious adverse effects to human health and/or the environment not related to COVID-19 treatment; • Activities that may have significant adverse social impacts and may give rise to significant social conflict; • Activities that may affect rights of vulnerable or disadvantaged groups; • Activities that may involve permanent resettlement or adverse impacts on cultural heritage; and • All the other excluded activities set out in the ESMF of the Project. 	<p>These exclusions shall be applied as part of the screening process conducted under action 1.2.a. above.</p>	MoHS
1.4	<p>CONTINGENT EMERGENCY RESPONSE FINANCING</p> <ol style="list-style-type: none"> a. Ensure that the Emergency Response Manual and ESMF include a description of the ESHS assessment and management arrangements for the implementation of the Contingent Emergency Response Component of the Project, in accordance with the ESSs. b. Prepare, disclose, consult and adopt any environmental and social (E&S) management plans or instruments which may be required for activities under the Contingent Emergency Response Component, in accordance with the Emergency Response Manual, the ESMF and the ESSs, and thereafter implement the measures and actions required under said E&S management plans or instruments, within the timeframes specified in said E&S management plans or instruments. 	<ol style="list-style-type: none"> a) The adoption of the Emergency Response Manual and relevant E&S instruments shall be withdrawal condition in the Financing Agreements and the Grant Agreement for the Project. b) The E&S management plans or instruments shall be prepared, disclosed, consulted, and thereafter adopted before the carrying out of the relevant Project activities under the Contingent Emergency Response Component. The E&S management plans or instruments shall be implemented in accordance with their terms, throughout Project implementation. 	MoHS

ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT: The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Association, including through, inter alia, implementing adequate occupational health and safety measures (including emergency preparedness and response measures), setting out grievance arrangements for Project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. These requirements are outlined in the ESMF.	Labor management requirement shall be incorporated through the implementation of adequate occupational health and safety measures throughout project implementation.	MoHS
2.2	OCCUPATIONAL HEALTH AND SAFETY: The Recipient shall implement adequate occupational health and safety measures (including emergency preparedness and response measures) in line with the ESMF, LMP, Infection Prevention & Waste Management Plan (IPC&WMP) and WHO guidelines on COVID-19 in a manner acceptable to the Association.	OHS measures shall be prepared as part of ESMF shall be implemented throughout Project.	MoHS
2.3	WORKERS CODE OF CONDUCT: The Recipient shall ensure that all health workers adhere to the WHO Code of Ethics and Professional conduct.	Throughout Project implementation	MoHS
2.4	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain, and operate a grievance redress mechanism for Project workers, consistent with ESS2, with focal points to address these grievances established within the MoHS.	Grievance Mechanism in place training of grievance focal points and publicization shall be completed as soon as possible and made operationalized before project effectiveness and maintained throughout Project.	MoHS
2.5	CHILD LABOR AND MINIMUM AGE The Recipient will prohibit child labor (any person under the age of 18) due to the hazardous work situation.	Throughout Project implementation	MoHS

ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>Relevant aspects of this standard shall be considered, as needed, under action 1.2 above, including, inter alia, measures to: carry out the purchase, storage, transportation and handling of vaccines in a safe manner and in accordance with the EHSGs, 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.</p> <p>The recipient shall update the existing medical care waste management plan and shall add to the waste management capacity the installation of incinerators in strategically located facilities- CHCs and CHPs, training to and logistical support to waste handlers to manage waste.</p>	<p>Medical care waste management plan shall be updated 30 days after effectiveness and implemented throughout Project implementation.</p>	MoHS
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<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; establish and implement appropriate quality management systems to manage the risks and the impacts that services provided and activities carried out under the Project may have on community health and safety; manage the risks of the use of security personnel; manage the risks of labor influx; and prevent and respond to sexual exploitation and abuse (SEA), and sexual harassment (SH).</p>	<p>Measures adopted as part of ESMF and implemented throughout Project implementation</p>	MoHS

4.2	<p>USE OF SECURITY PERSONNEL: No security forces will be used in any aspects of the vaccine deployment but where it becomes necessary, the following measures shall be adopted, to ensure that the engagement of security personnel are carried out in accordance with the ESSs:</p> <ol style="list-style-type: none"> Assess the risks and impacts of engagement of the security personnel, as part of the assessment referred to in action 1.2 a) above, and implement measures to manage such risks and impacts, 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 security personnel; Adopt and enforce standards, protocols and codes of conduct for the selection and use of security personnel, and screen such personnel to verify that they have not engaged in past unlawful or abusive behavior, including SEA, SH or excessive use of force; Ensure that the security personnel is adequately instructed and trained, prior to development and on a regular basis, on the use of force and appropriate conduct (including in relation to civilian-security engagement, SEA and SH, and other relevant areas), as set out in the Environmental and Social Management Framework.. Ensure that the stakeholder engagement activities under the Stakeholder Engagement Plan (SEP) include a communication strategy on the involvement of security personnel under the Project. Ensure that any concerns or grievances regarding the conduct of security personnel are received, monitored, documented (taking into account the need to protect confidentiality), resolved through the Project’s grievance mechanism and reported to the Bank no later than 14 days after being received; 	Prior to initiating recruitment of security personnel and Implemented throughout Project implementation	MOHS
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above.		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above.		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Not relevant		
ESS 8: CULTURAL HERITAGE			
8.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above.		
ESS 9: FINANCIAL INTERMEDIARIES			
	Not relevant.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN: Prepare, disclose, adopt, and implement a SEP 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>	A SEP has been prepared and disclosed for the parent project and shall updated and adopted for the AF before the Effective Date. The SEP shall be implemented throughout Project implementation	MoHS

<p>10.2</p>	<p>GRIEVANCE MECHANISM: An accessible grievance mechanism shall be established, publicized, maintained and operated 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 and acceptable to the Association.</p> <p>The grievance mechanism shall also receive, register and address concerns and grievances related to the sexual exploitation and abuse, sexual harassment in a safe and confidential manner, including through the referral of survivors to gender-based violence service providers.</p> <p>The grievance mechanism shall also receive, register and address concerns arising from unintended health consequences after vaccination especially those resulting in serious adverse effects.</p>	<p>Expansion of Grievance Mechanism related to COVID-19 vaccination, training of grievance focal points and publicization shall be completed as soon as possible and made operational before the Effectiveness Date and maintained throughout Project.</p>	<p>MoHS</p>
<p>CAPACITY SUPPORT (TRAINING)</p>			
	<p>EOC, EPI and other relevant implementing support staff responsible for the Project to receive training on the Project’s ESHS plans and instruments the roles and responsibilities of different key agencies in the ESF implementation. Training topics will among others include:</p> <ul style="list-style-type: none"> • Training of immunization personnel on adverse event following immunization (AEFI) surveillance; • Training on M&E tool; • Train waste handlers and incinerator operators; • COVID-19 Infection Prevention and Control protocols; • Laboratory biosafety guidance related to the COVID-19; • Specimen collection and shipment; • Standard precautions for COVID-19 patients; • Risk communication and community engagement; • WHO guidelines on quarantine including case management; • Labor management; • Grievance Mechanism; • Medical and hazardous waste management; and • Fair, equitable and inclusive access and allocation of Project benefits including COVID-19 vaccines. 	<p>No later than 30 days of the Effective Date and periodically with the addition of new Project team members join the Project throughout implementation.</p>	<p>MoHS</p>