

Republic of Sierra Leone Ministry of Health and Sanitation

Sierra Leone Quality Essential Health Services and Systems Support Project
(P172102)

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

October 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Sierra Leone (hereinafter the “**Recipient**”) will implement the Sierra Leone Quality Essential Health Services and Systems Support Project (the “**Project**”), through its Ministry of Health and Sanitation (**MoHS**). The International Development Association (hereinafter the “**Association**”) has agreed to provide financing for the Project.
2. The Recipient shall 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. The Recipient 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.
4. 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 conditions of the legal agreement, and the Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
5. 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, MoHS, on behalf of the Recipient, 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 an exchange of letters signed between the Association and the Recipient. MoHS shall promptly re-disclose the updated ESCP.
6. Where Project changes, unforeseen circumstances, 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, the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities and functioning of the grievances mechanism.	Quarterly throughout Project implementation	Integrated Health Projects Administration Unit (IHPAU) / MoHS
B	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 including but not limited to fatalities or instances of serious bodily harm, fire injuries, physical violence, Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH), car accidents, communicable diseases, and infections. 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.	Notify the Association within 48 hours after becoming aware of the incident or accident. Submit report on timeframe specified by the Association.	IHPAU/ MoHS/ Contractor
C	CONTRACTORS MONTHLY REPORTS The contracts for works shall use the Association's standard procurement documents, contractors shall be required to provide monthly E&S monitoring reports to MoHS. Such monthly reports would be submitted to the Association by MoHS upon request.	On a monthly basis from contractor mobilization and throughout the construction phase.	Contractor/ IHPAU/ MoHS
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE: The IHPAU under the Ministry of Health and Sanitation (MoHS) shall maintain an Environmental and Social Safeguard Unit with qualified staff and resources to support management of ESHS risks and impacts of the Project and implement the ESMF, ESMP and SEP. This Unit shall include 1 environmental specialist, 1 social specialist, and 1 waste management specialist. An Environmental and Social Safeguards Advisor has been recruited for a period of 12 months to strengthen capacity of the safeguard's unit and the position will be renewed for a total period of 36 months.	The EHS unit will be operational throughout project implementation. The specialist's positions are renewable on an annual basis, while the Safeguards Advisor position renewable annually for a total of 36 months.	IHPAU/ MoHS

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS</p> <p>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 ESSs and the Environmental and Social Management Framework (ESMF) and Resettlement Framework (RF) to be prepared for the Project. The ESMF shall also include a template for a medical waste management plan and Labor Management Procedures (LMP) which shall be part of the ESMP.</p> <p>a. Screen any proposed subproject in accordance with the Environmental and Social Management Framework (ESMF) prepared for the Project, and, thereafter prepare, disclose, adopt, and implement any environmental and Social Impact Assessments (ESIAs), environmental and social management plans (ESMP), Resettlement Action Plans (RAPs) or other instruments required for the respective Project activities as per the assessment process, in accordance with the ESSs the EHSs, and other relevant Good International Industry Practice (GIIP) and any other relevant guidelines in a manner acceptable to the Association.</p> <p>b. For piloting a Centralised Medical Waste Management Facility (CMWMF) CMWMF in the Western Area, the following actions shall be taken:</p> <ol style="list-style-type: none"> 1) Decide on the waste treatment technology, which in turn will inform the site selection. 2) Conduct a detailed feasibility study on the CBWFT to finalize the technology and site selection process. 3) Screen the subproject 'Pilot a Centralised Medical Waste Management Facility (CMWMF)' in accordance with the Environmental and Social Management Framework (ESMF) prepared for the Project, and, thereafter prepare, disclose, adopt, and implement an ESIA, an Infection Control and Waste Management Plan (ICWMP) and an ESMP for the CMWMF. <p>c. Incorporate the relevant aspects of this ESCP, including, inter alia, 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>The ESMF shall be adopted and disclosed before Appraisal, and shall be implemented throughout Project implementation. Assessments will be conducted before the carrying out of the relevant Project activities. RF shall be adopted and disclosed before Appraisal.</p> <p>a. Plans or instruments prepared, adopted, and disclosed before carrying out of the relevant activities, and thereafter implemented throughout the carrying out of such activities.</p> <p>b. (1) and (2) shall be financed by the project and shall be disbursement condition for the project activity on CMWMF.</p> <p>(3) Screening, ESIA, ICWMP and ESMP prepared, adopted, and disclosed before carrying out of the construction of the CMWMF, and thereafter implemented throughout the carrying out of the activity.</p> <p>c. Before launching the bidding procurement process for the relevant activities and thereafter throughout the carrying out of such activities.</p>	<p>IHPAU/ MoHS</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
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1.3	<p>EXCLUSIONS: The following types of activities shall not be eligible for financing 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 may have significant adverse social impacts and may give rise to significant social conflict. • Activities that may adversely affect the rights of vulnerable or disadvantaged groups. • Activities that may involve adverse impacts on cultural heritage. • All the other excluded activities set out in the ESMF of the Project. 	These exclusions shall be applied as part of the screening process conducted under action 1.2.a. above throughout Project implementation.	IHPAU/ MoHS
1.4	<p>CERC activities shall be implemented in accordance with the ESSs and the provisions of this ESCP</p> <p>The CERC ESMF shall be prepared within 2 months of Project Effectiveness. If the CERC is activated, the CERC ESMF shall be updated before CERC activities may begin, and shall thereafter be implemented throughout Project implementation</p>	<p>Throughout Project implementation</p> <p>Throughout Project implementation</p>	IHPAU/ MoHS
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES: The Project shall prepare Labor Management Procedures (LMP) in accordance with the applicable requirements of ESS2, in a manner acceptable to the Association. The LMP shall include all Project workers, including new health workers, that are engaged as part of the community-based activities under component 1.</p>	<p>The LMP will be prepared, adopted, and disclosed before Project Appraisal,</p> <p>The LMP shall be implemented throughout Project implementation.</p>	IHPAU/ MoHS
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.</p>	The grievance mechanism is in place and shall be maintained throughout Project implementation.	IHPAU/ MOHS/ Contractor

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<p>2.3 OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</p> <p>The range of OHS issues specific to this project relate to the two activities below:</p> <ul style="list-style-type: none"> • Piloting a Centralised Medical Waste Management Facility (CMWWMF), which at the operational stage, could expose health care workers, waste handlers, patients and the community to infection, toxic effects and injuries. The risk level is further elevated by the COVID-19 pandemic. Construction stage risks are identical to those listed under the next activity. • The rehabilitation and/or construction and provision of constant water and electricity supply in select health facilities in 5 districts, which at the construction stage could expose workers or the community to occupational health and safety risks, such as slips, trips and falls, dust and noxious emission, incidents, accidents, collision and project vehicles, machines and equipment and fatalities. <p>a) Prepare, adopt, and implement occupational, health and safety (OHS) measures including emergency preparedness and response measure specified in the ESMP.</p> <p>b) Prepare, adopt and implement a COVID-19 Preparedness and Prevention Plan (as part of the ESMP). This Plan shall follow WHO guidelines on COVID-19 preparedness and prevention, and shall comply with WB's and the country's policy and directive on COVID19 prevention, and will include COVID-19 protocols on public gatherings, and movement of people, and the conduct and protection of construction workers and the community at large</p> <p>c) Prepare, adopt and implement an Infection Control and Waste Management Plan (ICWMP) for the CMWWMF.</p> <p>d)</p>	<p>a. ESMP, including OHS measures, to be prepared before carrying out of the relevant activities, and thereafter implemented throughout the carrying out of such activities.</p> <p>b. ESMP, including COVID-19 Preparedness and Prevention Plan to be prepared before carrying out of the relevant activities, and thereafter implemented throughout the carrying out of such activities.</p> <p>c. ICWMP prepared, adopted, and disclosed before carrying out of the relevant activities, and thereafter implemented throughout the carrying out of such activities.</p>	<p>IHPAU/ MOHS/ Contractor</p>
<p>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p>		

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>3.1</p> <ul style="list-style-type: none"> Design the pilot CMWMF with eco-friendly and modern technologies. Prepare and implement a CMWMF Operational and Maintenance Plan Ensure the operation of the facility is maintained with adequate emission reduction and wastewater treatment facilities. Develop and implement ICWMP. Risks will be screened, and assessed in the ESIA for the CMWMF. Risk management will be addressed in the ESMP and ICWMP to be prepared, adopted and maintained for the facility in accordance with action 1.2c above. Construction-related risks due to the establishment of the (i) CMWMF and (ii) the rehabilitation and/or construction and provision of constant water and electricity supply in select health facilities in 5 districts, will also be addressed in the respective ESMPs; namely, CMWMF ESMP and site-specific ESMPs (for the 5 districts). Risks include sediment transport, dust and air emission generation, construction wastes etc. will also be addressed in the ESMP. <p>To mitigate any additional risks of toxic emission from dioxins and furans linked to incineration processes, the project will adopt a non-burn technology as informed by an initial screening, and subject to detailed assessment.</p>	<p>Screening, ESIA, ICWMP and ESMPs prepared, adopted, and disclosed before carrying out of the construction of the CMWMF, and thereafter implemented throughout the activity in accordance with action 1.2c above.</p>	<p>IHPAU/ MoHS</p>
<p>ESS 4: COMMUNITY HEALTH AND SAFETY</p>		
<p>4.1</p> <p>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, measures to: minimize the potential for community exposure to communicable diseases; and other construction risks such as road safety risk, noise, dust, accidents, etc.; 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 the use of security personnel; manage the risks of labor influx; and prevent and respond to sexual exploitation and abuse, and sexual harassment. These measures shall be included in the ESMPs to be prepared under action 1.2 above, in a manner acceptable to the Association.</p>	<p>The timeframe for the preparation and implementation of project ESMPs specified in action 1.2. Throughout Project implementation.</p>	<p>IHPAU/ MoHS/ contractor</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.2	<p>GBV AND SEA RISKS: Prepare, adopt, and implement a Gender-Based Violence Action Plan (GBV Action Plan) to assess and manage the risks of gender-based violence (GBV) and sexual exploitation and abuse (SEA).</p> <p>MoHS shall incorporate the GBV Action Plan requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms as part of contractor ESMP. The contractor shall implement GBV-related measures and the accountability framework spelled out in the C-ESMP. The contractors shall ensure adequate costing and funding for the implementation of these GBV-related measures.</p>	<p>Submit the GBV Action Plan to the Association within two months of Board approval. The GBV Action Plan shall be implemented throughout Project.</p> <p>Before preparation of the procurement documents and thereafter, implemented throughout construction phase.</p>	IHPAU, MoHS/ Contractor
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT PLANS: Prepare, adopt, and implement resettlement plans (RAPs) in accordance with ESS 5 and consistent with the requirements of the Resettlement Policy Framework (RPF) that will be prepared for the Project, and thereafter adopt and implement the respective RAPs before carrying out the relevant activities, in a manner acceptable to the Association.</p>	RAPs shall be submitted for the Association's approval and once approved, implemented prior to commencing Project activities that involve land acquisition and resettlement.	IHPAU/ MoHS
5.2	<p>GRIEVANCE MECHANISM The Project wide grievance mechanism (GM) shall be used to address Project- and resettlement-related complaints. The GM shall be described in the RPF, RAPs and SEP.</p>	The GM is already in place and shall be maintained throughout Project implementation.	IHPAU/ MOHS
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>Due to risks to wetlands and aquatic ecosystems identified under action 3.1 above, no project physical activities shall take place within 250m from wetlands, forests or other sensitive ecosystems. Work shall not be carried out within 250m from sensitive ecosystems or habitats, such as protected areas, forests, wetlands, and especially those with IUCN listed species.</p> <p>The Project shall screen subproject activities using the screening tool developed under the ESMF to determine potential biodiversity risks and impacts and identify commensurate mitigation measures. All biodiversity-related risks and impacts shall be comprehensively assessed and mitigated as part of the ESMPs. Other relevant aspects of this standard shall be considered, as needed, under action 1.2 above.</p>	Prior to commencing sub-project activities, and measures to be implemented throughout Project implementation.	IHPAU/ MoHS
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Not relevant		
ESS 8: CULTURAL HERITAGE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
8.1	The Project shall screen sub-project using the Screening Tool to develop under the ESMF. Sub-Project and Activity that have adverse impact shall be avoided, and any chance finds shall be addressed in accordance with the chance find procedure to be spelled out in the ESMF and site-specific ESMPs, consistent with ESS8.	Throughout Project implementation.	IHPAU/ MoHS
ESS 9: FINANCIAL INTERMEDIARIES			
	Not relevant.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN: Prepare, disclose, adopt, and implement a Stakeholder Engagement Plan (SEP) consistent with ESS10, in a manner acceptable to the Association.	A SEP will be prepared and disclosed before Project Appraisal and shall be implemented throughout Project implementation	IHPAU/ MoHS
10.2	GRIEVANCE MECHANISM: Maintain and operate an accessible grievance mechanism as described in the SEP in a manner acceptable to the Association.	GM in place and maintained throughout Project implementation	IHPAU/ MoHS
CAPACITY SUPPORT			
	Training shall be provided to Project personnel on the following topics: <ul style="list-style-type: none"> • Train Social Mobilizers and project implementation partners (IPs) on grievance redress and community engagement for project implementation. • Train project implementation partners (IPs) on SH/SEA and GBV. • Train project implementation partners (IPs) on Bank and project ESF requirements. • Train healthcare workers on healthcare waste management best practices in Western Area Urban and Rural. • Train medical waste handlers and operators on waste management procedures. • Training of Health Workers on Infection, Prevention and Control (IPC). • Train project workers on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situation. 	Throughout Project implementation.	IHPAU/ MoHS/ contractors/ project workers/