

**Republic of The Gambia
Ministry of Health**

**Sub-Saharan Women's Empowerment and
Demographic Dividend Plus Project (SWEDD+)
P176693**

Draft for negotiation

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

27 June 2023

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of The Gambia (the Recipient) shall implement the Sub-Saharan Women's Empowerment and Demographic Dividend Plus Project (SWEDD+) (the Project), with the involvement the Ministry of Health, Ministry of Gender, Children and Social Welfare, the Ministry of Basic and Secondary Education, the Ministry of Youth and Sports and the National Population Commission Secretariat, as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the referred agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Financing 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 Recipient 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 Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances. In such circumstances, the Recipient through the Ministry of Health, and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Permanent Secretary of the Ministry of Finance. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>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 instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s) (GM) for project workers, project level and GM process for responding to incidents of sexual exploitation and abuse/sexual harassment (SEA/SH).</p>	<p>Submit quarterly reports to the Association throughout Project implementation, commencing after the first quarter after Effective Date. Submit each report to the Association no later than 14 days after the end of each reporting period.</p>	<p>Projects Coordination Unit (PCU) in the Ministry of Health (MoH)</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>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, 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.</p> <p>Subsequently, at the Association’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence. Any notification of a SEA/SH incident will follow an information sharing protocol to respect the privacy, confidentiality and security of the survivor.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident, and within 24 hours in case of a fatality or SEA/SH incident.</p> <p>Provide subsequent reports to the Association within a timeframe acceptable to the Association.</p>	<p>PCU</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, also submit such reports to the Association.</p>	<p>Submit the monthly reports to the Association as annexes to the reports to be submitted under action A above.</p>	<p>PCU Contractors</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS		
<p>1.1 ORGANIZATIONAL STRUCTURE</p> <p>Establish and maintain a PCU with qualified staff and resources to support the management of Environmental, Social, Health and Safety (ESHS) risks and impacts of the Project including a social specialist and a SEA/SH specialist. An environmental consultant will be hired on as needed basis. The terms of reference (TOR) and qualifications of all candidates for these positions shall be subject to the Association’s no objection.</p>	<p>Establish and maintain a PCU prior to Effective Date as set out in the financing agreement. Hire or appoint the social specialist and SEA/SH specialist no later than three months after Effective Date, and thereafter shall maintain these positions throughout Project implementation. Hire an environmental consultant on a as needed basis.</p>	<p>PCU</p>
<p>1.2 ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <ol style="list-style-type: none"> 1. Prepare, consult on, disclose, adopt and implement an Environmental and Social Management Plan (ESMP) for the part of the Project for which the ESMP is required, consistent with the relevant ESSs. 2. Prepare, consult on, disclose, adopt and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs. 3. If activities warrant, ensure contractors adopt and implement the site-specific Environmental and Social Management Plan (ESMP), as set out in the ESMF. The proposed activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project. 4. Consult upon and contribute to the preparation the Regional Strategic and Social Assessment (R-SSA) for activities under component 3 which will be led by the Economic Community of West African States (ECOWAS) and the Economic Community of Central African States (ECCAS). The TOR for the R-SSA shall be subject to the Association’s no objection. 	<ol style="list-style-type: none"> 1. Prepare, consult on, disclose, adopt the ESMP prior to the start of project activities, and thereafter implement the ESMP throughout Project implementation. 2. Prepare, consult on, disclose, and adopt the ESMF prior to Effective Date and shall thereafter be implemented throughout Project implementation. 3. Adopt the contractor-ESMP before launching the bidding process for the respective Project activity prior to the carrying out of Project activity that requires the adoption of such ESMP. Once adopted, implement the respective ESMP throughout Project implementation. 4. Prior the start of technical assistance activities under component 3 and shall thereafter be implemented throughout Project implementation. 	<p>PCU Contractors</p>
<p>1.3 MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S</p>	<p>As part of the preparation of procurement documents and respective</p>	<p>PCU Contractors</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and make sure subcontractors will comply with the ESHS specifications of their respective contracts.	contracts. Supervise contractors throughout Project implementation.	
1.4	TECHNICAL ASSISTANCE Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building (including activities under components 1 and 2), training, and any other technical assistance activities under the Project, including, inter alia, social assessments related to policy reform or advocacy activities under component 3, are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs and the Regional-SESA. Thereafter ensure that the outputs of such activities comply with the terms of reference and Regional-SESA.	Throughout Project implementation.	PCU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Prepare, consult on, disclose, adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms. Provision of skills training (including livelihood skills), and pathways back into education (re-entry into school), or income generating activities for eligible out-of-school adolescent girls shall be supported pursuant to minimum employment age requirements and health and safety requirements as per ESS2, under the local labor and employment laws, and in line with the LMP.	Prepare, consult on, disclose, adopt the LMP prior to Effective Date, and thereafter implement the LMP throughout Project implementation.	MH/PCU
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism (GM) for Project workers, as described in the LMP and consistent with ESS2.	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	MH/PCU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

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3.1	WASTE MANAGEMENT PLAN Adopt and implement waste management measures, including for biomedical waste, to manage hazardous and non-hazardous wastes, consistent with ESS3 for activities requiring the preparation of an WMP.	Adopt the waste management measures as part of the ESMP, and thereafter implement the measures throughout Project implementation.	MH/PIU
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.2 above.	Same timeframe as for the adoption and implementation of the ESMP.	PCU
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.2 above.	Same timeframe as for the adoption and implementation of the ESMP.	PCU
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, the behavior of Project workers, risks of labor influx, response to emergency situations, the spread of communicable disease, sexual exploitation and abuse/sexual harassment (SEA/SH), and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.	Same timeframe as for the adoption and implementation of the ESMPs.	PCU
4.3	SEA AND SH RISKS Prepare, consult on, disclose, adopt and implement a SEA/SH Prevention and Response Action Plan as part of the ESMP, to assess and manage the risks of SEA and SH.	Prepare, consult on and disclose the SEA/SH Prevention and Response Action Plan as part of the ESMP and shall thereafter be implemented throughout Project implementation.	PCU
4.4	SECURITY MANAGEMENT Assess and implement measures to manage the security risks of the Project, including community conflict risks, as set out in the ESMP, guided by the principles of proportionality and Good International Industry Practice (GIIP), and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.	Same timeframe as the preparation of the ESMP and throughout Project implementation. Measures to address community conflict/social cohesions risks will be included in the ESMP.	PCU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
This standard is not relevant as there are no physical works or activities that could lead to economic and/or physical displacement.			
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
The standard is not relevant as there are no physical works.			
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES (IP/SSAHUTLCs)			
The standard is not relevant as there are no known IP/SSAHUTLCs in the project area.			
ESS 8: CULTURAL HERITAGE			
This standard is not relevant as there are no physical works in the project.			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).			
This standard is not relevant as the project does not include financial intermediaries.			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Prepare, consult on, disclose, 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.</p>	Prepare, consult on, disclosure, adopt the SEP prior to Effective Date, and thereafter implement the SEP throughout Project implementation.	PCU
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism (GM), 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>Any project related grievances prior to the operationalization of the project level GM, will be handled by the PIU and will make available and publicize multiple channels for stakeholders to submit grievances and questions.</p>	Establish the grievance mechanism, including the GM to address SEA/SH incidents, no later than three months after Project Effective Date, and thereafter maintain and operate the mechanism throughout Project implementation.	PCU
CAPACITY SUPPORT			
CS1	<p>Conduct training for PCU staff, stakeholders, communities, Project workers on, but not limited to:</p> <ul style="list-style-type: none"> • Stakeholder mapping and engagement • Specific aspects of environmental and social assessment • Emergency reporting, response and management • Community health and safety • SEA/SH risks and management • Assessing risks related to technical assistance under component 3 • Exclusion risks, especially for vulnerable and disadvantaged groups • Grievance management and monitoring 	Training to start within the first quarter of project Effective Date	PCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> • Reporting and monitoring • Monitoring and preparation of ESMP • Labor risks and management, including labor GM, Codes of Conduct • Culturally appropriate livelihoods • Handling/disposing of medical waste 		
CS2	Conduct training for Project workers on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.	Training to start within the first quarter of project Effective Date	PCU