



MINISTERE DE LA SANTE PUBLIQUE
UNITE DE COORDINATION DES PROJETS (UCP)

Support to COVID-19 vaccine purchase and health system
strengthening (P176841)

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

May 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Madagascar (hereinafter the Recipient) shall implement the Support to COVID-19 vaccine purchase and health system strengthening Project (the **Project**) through the Ministry of Public Health. The *International Development Association (hereinafter the Association)* has agreed to provide financing for the Project.
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 timeframes 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. The Recipient is responsible for compliance with all the requirements of the ESCP even when the implementation of specific measures and actions is conducted by its agencies, including the Ministry of Public Health, 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 provisions of the Financing Agreement
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, the Recipient 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. The Recipient shall promptly 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.

NAME OF PROJECT:

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, including but not limited to (i) the implementation of the ESCP; (ii) preparation and implementation of stakeholder engagement activities, (iii) implementation of the Labor Management Procedures (LMP);(iv) implementation of the ESMF; (iv) the functioning of the Grievance Mechanism (GM) (v) and the implementation of the national medical waste management plan.</p>	<p><i>Starting from the Effective Date, six-monthly reports shall be submitted no later than 10 days after the end of each reporting period, throughout Project implementation.</i></p>	<p><i>Ministry of Public Health/PIU</i></p>
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 , <i>including, any COVID outbreak in the Project area and any allegation of gender-based violence and/or sexual exploitation, abuse and harassment (GBV/SEA-H), project-related work accidents or fatalities, worker strikes and social unrest.</i></p> <p>Provide sufficient detail regarding the incident or accident, while ensuring confidentiality especially for GBV/SEA-H related incidents, 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.</p>	<p><i>Notify the Bank within 48 hours after learning of the incident or accident.</i></p> <p><i>A detailed report would be provided within a timeframe acceptable to the Association, as requested</i></p>	<p><i>Ministry of Public Health/PIU</i></p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE: The Ministry of Health shall establish and maintain a PIU (Unité de Coordination de Projet-UCP) with qualified staff and resources to support management of ESHS risks and impacts of the Project including the current E&S specialist of PARN Project (Nutrition and Health Project-P160848), an additional E&S specialist and one Social Mobilization and Communication Specialist.</p> <p>The PIU shall contractually require and ensure that organizations (WHO, UNICEF, etc.) contracted to support project activities (WHO, UNICEF, etc.) follow the Project’s ESMF and comply with all relevant ESSs.</p>	<p><i>E&S specialist and Social Mobilization and Communication Specialist shall be hired, not later than 30 days after the Effectiveness date, before the carrying out of relevant Project activities.</i></p> <p><i>PIU shall be maintained throughout Project implementation</i></p>	<p><i>Ministry of Public Health</i></p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS</p> <p>a. Prepare, disclose, consult, adopt and implement an Environmental and Social Management Framework (ESMF) for the Project, including a SIA, in accordance with the ESSs, the Environmental, Health and Safety Guidelines (EHSGs), and other relevant Good International Industry Practice (GIIP), including relevant WHO guidelines 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 .</p> <p>b. Assess the environmental and social risks and impacts of proposed Project activities, in accordance with the <i>Environmental and Social Management Framework (ESMF)</i></p> <p>c. 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, this ESCP and the ESMF</p> <p>d. 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>e. 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>f. Deploy and effective surveillance system to monitor adverse events following immunization in line with WHO guidelines and SIA recommendations.</p>	<p>a. <i>ESMF shall be prepared, disclosed, consulted and adopted as a Disbursement condition;</i></p> <p>b. Assessment shall be conducted before the carrying out of the relevant Project activities.</p> <p>c. Plans/instruments shall be prepared, disclosed, consulted and adopted before initiating of the relevant Project activities, and thereafter implemented throughout the carrying out of such activities.</p> <p>d. The relevant ESHS measures shall be incorporated into the procurement documents before launching the procurement process for the relevant Project activities, and shall thereafter complied with throughout the carrying out of such activities.</p> <p>e. Before the carrying out of the relevant Project activities, and thereafter implemented throughout the carrying out of such activities.</p> <p>f. Prior to initiating vaccination activities</p>	<p><i>Ministry of Public Health/PIU</i></p>

NAME OF PROJECT:

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	<p>EXCLUSIONS: Exclude the following types of activities as ineligible for financing under the Project:</p> <ul style="list-style-type: none"> • Activities not in compliance with ESS. • Activities that may cause long term, permanent and/or irreversible (e.g., loss of major natural habitat) adverse impacts • All Activities that have high probability of causing serious adverse effects to human health and/or the environment not related to treatment of COVID-19 cases will not be eligible • Activities that may have significant adverse social impacts and may give rise to significant social conflict. • Activities that may involve permanent resettlement or land acquisition or adverse impacts on cultural heritage. • All the other excluded activities set out in the ESMF of the Project. 	During the assessment process conducted under action 1.2.a. above.	Ministry of Public Health/PIU
1.4.	<p>CONTINGENT EMERGENCY RESPONSE COMPONENT</p> <p>a. Adopt the manual and, if applicable, other relevant ESHS documents in form and substance acceptable to the Association to ensure that the <i>CERC Manual as specified the financing agreement</i> includes the results of the ESHS assessment and management arrangements and required management instruments for CERC activities.</p> <p>b. Prepare, disclose, consult and adopt any environmental and social (E&S) management plans or instruments which may be required for activities under <i>CERC component</i> of the Project, in accordance with <i>CERC Manual and, if applicable, CERC-ESMF</i></p>	<p>a. As a condition of withdrawal of funds under the CERC under Section [XXX] of Schedule 2 of the Financing Agreement for the Project.</p> <p>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 <i>CERC component</i>. The E&S management plans or instruments shall be implemented in accordance with their terms, throughout Project implementation.</p>	Ministry of Public Health/PIU
ESS 2: LABOR AND WORKING CONDITIONS			

NAME OF PROJECT:

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	LABOR MANAGEMENT: The Project shall be carried out in accordance with the applicable requirements of ESS2 including through, inter alia, implementing adequate occupational health and safety measures (including personal protective equipment, and emergency preparedness and response measures), prohibition of child labor and forced labor, drafting codes of conducts including clauses and sanctions against SEA-H behaviors, setting out grievance mechanisms for Project workers sensitive to SEA-H risks, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. All staff shall be trained on SEA-H risks and codes of conduct expectations before starting work through project implementation. The Labor Management Procedures shall be prepared to include vaccine-related labor management considerations and reflect labor management measures in accordance with ESS2.	LMP shall be prepared and disclosed as a condition of disbursement Once approved, it shall be applied throughout Project implementation.	<i>Ministry of Public Health/PIU</i>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

NAME OF PROJECT:

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<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 (including, ultra-cold chain management) in a safe manner and in accordance with the EHSs, and other relevant GIP including relevant WHO guidelines; and adequately manage and dispose of health care wastes (including, vaccines) and other types of hazardous and non-hazardous wastes.</p> <p>The Recipient, through PIU at Ministry of Public Health, shall update the National Medical Waste Management Plan (NMWMP), that has been prepared for the PARN Project-P160848, to include particular measures related to COVID-19 vaccines such as risks related to the transport, storage, handling and disposal of vaccines.</p> <p>The Recipient shall ensure that any beneficiary medical facility/lab follows the requirements of the ESMF and the NMWMP, in accordance with the EHSs, and other relevant GIP including relevant WHO guidelines. An agreement including E&S requirements should be signed with any beneficiary medical facility/lab and regular monitoring of the implementation of E&S measures shall be carried out by the E&S specialists of the PIU during the implementation of project.</p>	<p>The NMWMP for the PARN Project was disclosed on April 2020 and shall be updated, disclosed, consulted upon and adopted by as a Disbursement condition . It shall be implemented throughout the implementation of project once approved</p>	<p><i>Ministry of Public Health/PIU</i></p>
<p>POLLUTION PREVENTION AND MANAGEMENT</p> <p>Develop and implement specific ESMPs incorporating specific pollution prevention and management measures in accordance with the measures described in the ESMF, for activities with a high pollution risk</p>	<p>As soon as the environmental and social assessment of an activity identifies a significant risk of pollution.</p> <p>All ESMPs must be approved by the Association and disseminated nationally and on the Association's website.</p> <p>Validation of the ESMPs shall be a prerequisite for the start of all works.</p>	
<p>ESS 4: COMMUNITY HEALTH AND SAFETY</p>		

NAME OF PROJECT:

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.1	<p>COMMUNITY HEALTH AND SAFETY: Relevant aspects of this standard shall be considered, under action 1.2 above including, inter alia, measures to: minimize the potential for community exposure to communicable diseases; 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, and sexual harassment.</p>	At the Project and subproject level in accordance with section 1.2 above.	<i>Ministry of Public Health/PIU</i>
	A SEA-H action Plan, embedded in the ESMF, shall be prepared, disclosed, consulted upon, and adopted	As a Disbursement condition and implemented thereafter throughout Project implementation.	<i>Ministry of Public Health/PIU</i>
	Develop, adopt and implement specific provisions relating to health barrier measures in the face of the pandemic such as COVID-19 for local populations faced with the influx of labor from the Project, and include these measures in the ESMPs which shall need to be developed and implemented satisfactorily	To be prepared before the start of activities and monitor compliance throughout the implementation of the Project	<i>Ministry of Public Health/PIU</i>
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
	Not Relevant		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	Not Relevant		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
	Not Relevant		
ESS 8: CULTURAL HERITAGE			
	Not Relevant		
ESS 9: FINANCIAL INTERMEDIARIES			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

NAME OF PROJECT:

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN: Prepare or revise, disclose, consult, adopt and implement a Stakeholder Engagement Plan (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 draft SEP was already prepared and disclosed by appraisal, and shall be consulted, updated and adopted as a condition of disbursement. The SEP shall be implemented throughout Project implementation.	<i>Ministry of Public Health/PIU</i>
10.2	<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.</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>	GM to be operational not later than 30 days after Effective Date and maintained throughout Project implementation.	<i>Ministry of Public Health/PIU</i>
CAPACITY SUPPORT (TRAINING)			
CS1	Project Management Unit and other relevant implementing support staff responsible for the Project to receive training on the Project's ESHS and ESF plans and instruments, fair, equitable and inclusive access and allocation of Project benefits [<i>including with regards to vaccines</i>], and the roles and responsibilities of different key agencies in the ESF implementation.	No later than 30 days of the Effective Date and periodically with the addition of new Project team members join the Project throughout implementation.	<i>Ministry of Public Health/PIU]</i>
CS2	<i>Project Management Unit and other implementing support staff responsible for the Project to receive training on AEFI monitoring systems including provision of necessary technical assistance and capacity building</i>	Develop an effective training before deployment of Covid-19 vaccines begins.	<i>Ministry of Public Health/PIU</i>