

The Republic of Kenya
Ministry of Health
KENYA COVID-19 EMERGENCY RESPONSE
PROJECT (P173820)

[Draft]

ENVIRONMENTAL and SOCIAL
COMMITMENT PLAN (ESCP)

23 March 2020

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Kenya (the **Recipient**) will implement the KENYA COVID-19 EMERGENCY RESPONSE PROJECT (the **Project**), with the involvement of the Ministry of Health. The International Development Association (the **Association**) has agreed to provide financing for the Project.
2. The Recipient 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, 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 referenced in 1 above.
4. Implementation of the material measures and actions set out in this ESCP will 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, 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 the exchange of letters signed between the Association and the Recipient. The Recipient will 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.

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 the Project implementation period.	Ministry of Health, Kenya
B	International Alignment. The MoH will review the Project's implementation, monitoring, and reporting on environmental and social matters under the Project in line with updated WHO updated guidance on Covid 19.	Reporting quarterly throughout the Project implementation period.	Ministry of Health, Kenya
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE: The Ministry of Health shall establish and maintain a Project Management Team (PMT) with qualified staff and resources to support management of environmental and social risks and impacts of the Project including dedicated environmental (at least one) and social risk management (at least one) specialists.	The PMT staff shall be assigned prior to the commencement of Project activities. The PMT shall be maintained throughout Project implementation.	Ministry of Health, Kenya

1.2	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS</p> <p>a. Prepare, disclose and adopt the Environmental and Social Management Framework (ESMF). The ESMF will include a template for Infection Control and Waste Management Plan (ICWMP) based on the existing ICWMP prepared for the Africa CDC Regional Project as well as a template for Environmental and Social Management Plan (ESMP) as necessary for isolation centers construction.</p> <p>b. 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 ESMF.</p> <p>c. Prepare, publicly consult, disclose, adopt, and implement Infection Control and Waste Management Plans, Environmental and Social Management Plans and/or other instruments, if required for the respective Project activities based on the screening and assessment process, in accordance with the ESSs, the ESMF, the EHSGs and other relevant Good International Industry Practice (GIIP) including relevant WHO Guidelines related to COVID-19, in a manner acceptable to the Association.</p> <p>d. 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>a. The ESMF shall be prepared, disclosed and adopted within one (1) month after the Effective Date,</p> <p>b. Assessment shall be conducted before the carrying out of the relevant Project activities.</p> <p>c. Before carrying out of the relevant Project activities, and thereafter throughout the carrying out of such activities.</p> <p>d. Before launching the procurement process for the relevant activities and thereafter throughout the carrying out of such activities.</p>	Ministry of Health, Kenya
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	e. Update Environmental and Social Management Plans, And Infection Control and Waste Management Plans or other instruments based on updated guidance by WHO on COVID19.	e. Throughout project implementation	
1.3	<p>EXCLUSIONS: Exclude the following type of activities as ineligible for financing under the Project:</p> <ul style="list-style-type: none"> • Activities that may cause long term, permanent and/or irreversible adverse (e.g. loss of major natural habitat) impacts • Activities that have high probability of causing serious adverse effects to human health and/or the environment not related to treatment of COVID19 cases • Activities that may have significant adverse social impacts and may give rise to significant social conflict • Activities which would require Free Prior Informed Consent. • Activities that may affect lands or rights of Vulnerable and Marginalized Groups or other vulnerable minorities • 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 Health, Kenya
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above.	Throughout Project implementation.	Ministry of Health, Kenya

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.2	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.	Throughout Project implementation.	Ministry of Health, Kenya
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above, including, inter alia, measures to: manage health care wastes, and other types of hazardous and non-hazardous wastes.	Throughout Project implementation.	Ministry of Health, Kenya
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	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 the use of security personnel; manage the risks of labor influx; and prevent and respond to sexual exploitation and abuse, and sexual harassment.	Throughout Project implementation.	Ministry of Health, Kenya
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.	Throughout Project implementation.	Ministry of Health, Kenya
5.2	All construction and isolation tents will be undertaken within existing facilities and thus at this point ESS5 is not considered relevant. In case land acquisition would be necessary, plans will be developed in accordance with ESS5 to the satisfaction of the Bank prior to commencement of any land acquisition and displacement.	Throughout Project implementation.	Ministry of Health, Kenya

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
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.	Throughout Project implementation.	Ministry of Health, Kenya
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above.	Throughout Project implementation.	Ministry of Health, Kenya
7.2	The Recipient will ensure that SSAHUTLC communities are appropriately informed and can share in the benefits of the project in an inclusive and culturally appropriate manner (i.e. prevention and treatment) with provisions included in the SEP, in accordance with ESS7.	Throughout Project implementation.	Ministry of Health, Kenya
7.3	In case SSAHUTLC communities would be affected by quarantine provisions, site-specific approaches would be prepared to ensure adequate consideration of their specific cultural needs in accordance with ESS7, to the satisfaction of the Bank.	Throughout Project implementation.	Ministry of Health, Kenya
ESS 8: CULTURAL HERITAGE			
8.1	Relevant aspects of this standard shall be considered, as needed, under action 1.2 above.	Throughout Project implementation.	Ministry of Health, Kenya
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	Not relevant.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN: Prepare and disclose, a draft Stakeholder Engagement Plan (SEP) consistent with ESS10, in a manner acceptable to the Association.	A draft SEP shall be prepared and disclosed before the Board presentation date	Ministry of Health, Kenya

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
10.2	UPDATE SEP: Update the SEP, with the inclusion of a risk communication and community engagement (RCCE) strategy, to be finalized under the Project in line with WHO guidance on “Risk communication and community engagement (RCCE) readiness and response to the 2019 novel coronavirus (2019-nCoV)” (January 26, 2020), and adopt it consistent with ESS10, in a manner acceptable to the Association.	The updated SEP will be prepared within 1 month after the Effective Date.	Ministry of Health, Kenya
10.3	STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE: Implement the Stakeholder Engagement Plan (SEP) consistent with ESS10, including the use of different, culturally appropriate communication approaches to ensure communication also with the most vulnerable, including illiterate and people with disabilities and hard to reach communities.	Throughout Project implementation.	Ministry of Health, Kenya
10.4	CASE MANAGEMENT: In line with the SEP, the Project will ensure systematic case management, allowing communication between quarantined people and their relatives.	Throughout Project implementation.	Ministry of Health, Kenya
10.5	GRIEVANCE MECHANISM: Accessible grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Association.	Throughout Project implementation.	Ministry of Health, Kenya
CAPACITY SUPPORT (TRAINING)			
11.1	Training topics for personnel involved in Project implementation will among others include: <ul style="list-style-type: none"> • COVID-19 Infection Prevention and Control Recommendations • Laboratory biosafety guidance related to the COVID-19 • Specimen collection and shipment • Standard precautions for COVID-19 patients • Risk communication and community engagement • Grievance redress mechanisms • WHO and Africa CDC guidelines on quarantine including case management 	Throughout Project implementation.	Ministry of Health, Kenya