

**GABON**  
**COVID-19 Strategic Preparedness and Response**  
**Project (SPRP)**

**[Draft/Version for Negotiations]**  
**ENVIRONMENTAL and SOCIAL**  
**COMMITMENT PLAN (ESCP)**

**April 22, 2020**

CONFIDENTIAL

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Gabon (hereinafter the **Borrower**) shall implement the Gabon COVID-19 Response Project (the **Project**) with the involvement of the Ministry of Health. The International Bank for Reconstruction and Development (hereinafter **the Bank**) has agreed to provide financing for the Project.
2. The Borrower 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.
3. The Borrower is responsible for compliance with all requirements of this ESCP even when implementation of specific measures and actions is conducted by the Ministry referenced in paragraph 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 Borrower as required by the ESCP and the conditions of the legal agreement, and the Association shall 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 Borrower, 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 Borrower shall agree to the changes with the Association and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Association and the Borrower. The Borrower 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 Borrower 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
<b>MONITORING AND REPORTING</b>			
A	<b>REGULAR REPORTING:</b> Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to, stakeholder engagement activities, incident reports and grievance log.	Starting from the Effective Date, every six-months during the Project's implementation in conjunction with the Project Reports.	Ministry of Health through CNTIPPEE ("Commission Nationale des Travaux d'Intérêt Public pour la Promotion de l'Entreprenariat et l'Emploi"), acting as the Project Implementation Unit, hereafter MOH-CNTIPPEE
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<b>ORGANIZATIONAL STRUCTURE:</b> The Borrower shall maintain the Project Implementation Unit (CNTIPPEE or Commission Nationale des Travaux d'Intérêt Public pour la Promotion de l'Entreprenariat et l'Emploi) with qualified staff and resources to support management of ESHS risks and impacts of the Project including environmental and social risk management specialists. Environmental and social specialists to be hired by the PIU include one environmental specialist, one social specialist and one Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) specialist.	PIU to be maintained throughout Project implementation. Additional environment specialist, social specialist and SEA/SH specialist shall be recruited not later than 30 days after the Effective Date (as defined in the Loan Agreement) and thereafter retained throughout Project implementation. CNTIPPEE currently has two E&S specialists and they will manage E&S risks for the period following effectiveness and before the E&S staff is recruited.	MOH -CNTIPPEE

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.2 <b>ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS</b></p> <p>a. Assess the environmental and social risks and impacts of proposed Project activities, in accordance with the Environmental and Social Management Framework (ESMF), to be prepared, disclosed and adopted for the Project, 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. An Infection Control Medical Waste Management Plan (ICMWMP) that integrates WHO guidance and other Good International Industry Practice (GIIP) will be integrated into the ESMF. The ESMF will also screen and identify the risks related to contracting and/or utilizing security forces to support e.g. construction of isolation units or other relevant activities supported under the project. In doing so, the environmental and social assessment will be guided by the principles of proportionality and GIIP, and by applicable law, in relation to engaging security forces, rules of conduct, training, equipping, and monitoring of security forces.</p> <p>b. Prepare, disclose, adopt, and implement any environmental and social management plans or other instruments required for the respective Project activities based on the assessment process, in accordance with the ESSs, the ESMF, the World Bank Group Environmental, Health and Safety Guidelines(EHSGs), and other relevant GIIP including relevant WHO guidelines on COVID-19 response, in accordance with the requirement of the ESS and in a manner acceptable to the Bank.</p> <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>a. The ESMF shall be finalized not later than 30 days after the Effective Date. Between Effective Date and the disclosure and adoption of the ESMF, the Project shall strictly follow current WHO guidance on COVID-19 in a manner consistent with the ESSs. Assessment to be conducted before the carrying out of the relevant Project activities.</p> <p>b. Before the carrying out of the relevant Project activities, and thereafter throughout the carrying out of such activities.</p> <p>c. Before launching the procurement process for the relevant Project activities, and thereafter throughout the carrying out of such activities.</p>	<p>MOH -CNTIPPEE</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	<p><b>EXCLUSIONS:</b> Exclude the following types of activities as ineligible for financing under the Project:</p> <ul style="list-style-type: none"> <li>• Activities that may cause long term, permanent and/or irreversible adverse impacts (e.g. loss of major natural habitat);</li> <li>• Activities that have high probability of causing serious adverse effects to human health and/or the environment;</li> <li>• Activities that may have significant adverse social impacts and may generate social conflict;</li> <li>• Activities that may involve only permanent but any resettlement or land acquisition/use restriction, economic displacement or adverse impacts on cultural heritage;</li> <li>• Activities that would require Free, Prior, Informed Consent (FPIC);</li> <li>• All the other excluded activities set out in the ESMF of the Project.</li> </ul>	During the assessment process conducted under action 1.2.a. above.	MOH -CNTIPPEE
1.4	Provide medical and emergency services and supplies based on the urgency of the need, in line with the latest data related to the prevalence of the cases.	Throughout Project implementation	MOH -CNTIPPEE
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT:</b> The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Bank, including through, inter alia, implementing adequate occupational health and safety measures (including emergency preparedness and response measures), establishing grievance arrangements for Project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents. The Borrower shall adopt and implement Labor Management Procedures (LMP) incorporating the relevant requirements of ESS2. The Borrower shall ensure that specific prohibitions will be enacted in the deployment of security personnel for the construction or other relevant activities, including no child labor and no forced labor.</p>	The LMP shall be prepared and disclosed and adopted not later than 30 days after the Effective Date. The LMP shall be updated and revised periodically as necessary and implemented throughout Project implementation. All other measures specified under this action 2.1 to be implemented throughout the Project implementation period.	MOH -CNTIPPEE
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
	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. An Infection Control Medical Waste Management Plan (ICMWMP) that integrates WHO guidance and other international good practice shall be integrated into the ESMF and finalized not later than 30 days after the Effective Date.		
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			

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: 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 (if needed); and prevent and respond to sexual exploitation and abuse and sexual harassment (SEA/SH). The Borrower shall ensure that any security personnel engaged in the construction or other relevant activities associated with the Project have been i) screened to confirm that they have not engaged in past unlawful or abusive behavior, including SEA, SH or excessive use of force; (ii) adequately instructed and trained, on a regular basis, on the use of force and appropriate behavior and conduct (including in relation to SEA and SH); (iii) deployed in a manner consistent with applicable national law; and (iv) will follow strict rules of engagement, code of conduct, and avoid any escalation. The ESMF will provide guidance regarding how these measures will be integrated.</p>		
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>		
Not currently relevant. The project will not require any land acquisition or economic displacement.		
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>		
Not currently relevant.		
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>		
7.1	<p><b>INDIGENOUS PEOPLES:</b> The Project shall be carried out in accordance with the applicable requirements of ESS7, in a manner acceptable to the Bank, including, inter alia, implementing adequate measures to ensure that IP/SSAHUTLCs 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 ESMF and SEP. The relevance of this Standard will be assessed by further screening during implementation.</p>	<p>Throughout Project implementation.</p> <p>MOH -CNTIPPEE</p>
7.2	<p>If IP/SSAHUTLCs are subject to quarantine provisions/policies, site-specific Indigenous Peoples Plans shall be prepared, disclosed and adopted, and thereafter implemented in accordance with the ESMF and SEP to ensure adequate consideration of their specific cultural needs, in form and substance satisfactory of the Bank.</p>	<p>Throughout Project implementation.</p> <p>MOH -CNTIPPEE</p>
<b>ESS 8: CULTURAL HERITAGE</b>		
Relevant aspects of this standard shall be considered, as needed, under action 1.2 above.		
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>		
Not currently relevant.		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>		
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN:</b> Update, disclose and implement the Stakeholder Engagement Plan (SEP) consistent with ESS10, in a form and substance satisfactory to the Bank. The SEP shall include measures to address the particular needs of Indigenous peoples per the provisions included in the ESMF and SEP. The documents disclosed shall also include relevant information about the arrangements to the public about the use of security forces in the delivery of services supported under the Project.</p>	<p>A draft SEP has already been prepared and disclosed and shall be updated not later than 30 days after the Effective Date. The SEP shall be implemented throughout Project implementation.</p> <p>MOH -CNTIPPEE</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
10.2	<b>GRIEVANCE MECHANISM:</b> 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 Bank.	The project GRM shall be operational and adequately resourced no later than 30 days after the Effective Date and thereafter maintained throughout Project implementation.	MOH -CNTIPPEE
<b>CAPACITY SUPPORT (TRAINING)</b>			
	Improve capacity of CNTIPPEE by providing: i) training for all relevant staff, health workers and other stakeholders such as surface technicians regarding environmental and social risks and waste management; ii) training on grievance redress mechanism for complaint management committees; iii) training to staff of health delivery facilities including other workers on the adequate use of personal protection equipment and on diagnosis, care and notification of positive COVID-19 cases; and iv) training on the prevention of GBV and SEA/SH and awareness of child protection protocols, on Sexually Transmitted Diseases (STDs) and other communicable diseases, including to security personnel. The recruitment of a specialized NGO may be necessary to provide some of this training.	A comprehensive training plan shall be prepared not later than 30 days after the Effective Date. It shall be implemented throughout Project implementation.	MOH -CNTIPPEE