



Concept Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 04/20/2020 | Report No: ESRSC01126



BASIC INFORMATION

A. Basic Project Data

Country	Region	Project ID	Parent Project ID (if any)
Gambia, The	AFRICA	P173287	
Project Name	The Gambia Essential Health Services Strengthening Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Health, Nutrition & Population	Investment Project Financing	6/8/2020	8/31/2020
Borrower(s)	Implementing Agency(ies)		
The Gambia	Ministry of Health		

Proposed Development Objective(s)

To improve utilization and quality of essential health services in The Gambia

Financing (in USD Million)	Amount
Total Project Cost	50.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The proposed project will support the following:

- a. Delivery of essential primary health care services
- b. Health system strengthening
- c. Project management

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]



The project has national coverage, with some on-site activities already identified for specific locations while others will be determined during project preparation and implementation.

D. 2. Borrower’s Institutional Capacity

The project will be implemented by the Ministry of Health, which is new to World Bank procedures and policies. The Project Coordination Unit (PCU) has limited previous experience working on World Bank operations, and is not familiar with the Environmental and Social Framework. A more detailed environmental and social due diligence of the institutional arrangements will be carried out during preparation to assess any gaps in capacity and the need for procuring a environmental/social development specialists dedicated to managing and monitoring the social and environmental risks and impacts of the project.

The feedback from the project (P143650) being finalized by the National Nutrition Agency NaNA must be capitalized for better management of environmental and social aspects.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating

Substantial

The environmental risk classification for the project is Substantial under the World Bank ESF, mainly because of the risks linked to the management of biomedical waste but also because of the risks linked to the renovation and construction of certain sanitary facilities. Labor management and health and safety risks also need to be taken into account given the limited capacity of the PIU on these issues.

These risks will be mitigated through capacity building activities, by preparing required environmental and social instruments, and by hiring environmental and social specialists to support the PIU with the implementation of environmental and social measures.

Social Risk Rating

Moderate

The project's diverse set of activities is generally expected to provide significant social benefits to the targeted beneficiaries, including marginalized and disadvantaged people. A number of limited risks could, however, emerge. These include a) Physical and/or economic displacement as a result of land acquisition for the construction of health centers and other facilities; b) Exclusion of vulnerable groups from various outreach and registration activities (health insurance, CVRS); c) Privacy and data misuse issues due to transition from written to electronic records.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

Assessment and management of environmental and social risks and impacts will be required for one of the components.

Component 3: Health system strengthening (Subcomponent 3.a: Emergency obstetric and neonatal care and minor renovations of health facilities). Implementation of these activities are likely to generate some level of environmental

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and social impacts, which will need to be mitigated. Potential impacts are expected to be site specific and mostly during health facilities rehabilitations these will include noise, health and safety issues, solid waste management, etc. Subcomponent 3.b (Improving health care waste management): The expected impacts and risks with this component must be adequately mitigated with the development of a Health Care Waste Management Plan (HCWMP) with the training component for the various stakeholders.

Implementation of the Contingent Emergency Response Component (CERC) can cause impacts and risks too.

At this stage of the project and given the potential impacts expected during the implementation phase of the project, the development of an Environmental and Social Management Framework is appropriate. In addition to setting out the above-cited mitigation measures, there is also a broader requirement to ensure that people are aware of the enhanced medical facilities and services.

In accordance with the new ESF Framework, the borrower will also have to develop the Environmental and Social Engagement Plan (ESCP) during the preparation phase, as well as targeted training and support to the environmental and social specialists in the PCU.

The companies that will be recruited for rehabilitation works, construction of buildings and incinerators must develop an Environmental and Social Management Plan (ESMP), integrating the risks and mitigation measures during the preparation and construction phase. This document must be approved before the start of works.

Areas where “Use of Borrower Framework” is being considered:

Use of Borrower Framework is not being considered for this project.

ESS10 Stakeholder Engagement and Information Disclosure

Stakeholder engagement is a critical tool for social and environmental risk management, project sustainability and success. In consultation with the Bank, the client will prepare and implement an inclusive Stakeholder Engagement Plan (SEP). It will ensure appropriate representation and participation of various groups of stakeholders, including women, minority and vulnerable groups. Particular efforts will be made to reach groups such as religious leaders who may influence the perception and uptake of health services as well as health care workers. A draft of the SEP will be prepared and disclosed as early as possible and prior to Appraisal.

The Borrower will engage in meaningful consultations on policies, procedures, processes and practices (including grievances) with all stakeholders throughout the project life cycle, and provide them with timely, relevant, understandable and accessible information.

A project-wide grievance redress mechanism (GRM), proportionate to the potential risks and impacts of the project will be established.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.



ESS2 Labor and Working Conditions

The PCU is expected to be staffed by around 6 direct workers and possibly, civil servants. As direct workers performing critical project functions, requirements under ESS2 will be applicable to both the PCU and relevant results-based finance institutions. Key issues to be addressed in the Labor Management Procedures include terms and conditions of employment, nondiscrimination and equal opportunity, worker's organizations. Due diligence is also needed to ensure Borrower meets requirements on child labor, forced labor and occupational health and safety. Civil servants will be bound by their public sector contracts, unless their contract has been transferred to the project. Provisions regarding forced and child labor and occupational health and safety will also apply to civil servants. The ESMF screening process will refer to and pay special attention to any subproject that may need community labor. During implementation the Borrower will prepare, where needed, Labor Management Procedures (LMPs) which will set out the way in which project workers will be managed in accordance with the requirements of national law and the ESS2.

The LMP will include measures to ensure that labor is provided on a voluntary basis and will further ensure that the health and safety of workers, especially women are given adequate attention. It will also have the details of the grievance redress mechanism for workers and the roles and responsibilities for monitoring such workers.

ESS3 Resource Efficiency and Pollution Prevention and Management

Vegetation and soil loss: The clearance and loss of areas of vegetation and faunal habitat is not expected. The environmental impact of the infrastructure activities will be assessed in the ESMF. The required building material will potentially include stones, sand, concrete blocks or timber must be obtained from authorized quarries

Air emissions: During the rehabilitation of infrastructures, air emissions may include fugitive dust. Those most likely to be affected are people living within the proximity of these infrastructure sites but also the workers. The implementation of mitigation measures such as dust suppression and vehicle maintenance will be applied to minimize the impact of air emissions during construction, wearing suitable masks, and residual impacts are expected to be limited in scope and duration.

Waste management: waste is mainly expected from the increase of people having access to health care facilities (biomedical). The health care waste management plan is prepared for a good management by health care centers. Waste from rehabilitation and construction works will be covered by the site waste management plan, which will be developed by the contractors.

ESS4 Community Health and Safety

As women's empowerment is low, and risks of and exposure to GBV is moderate, project activities may exacerbate risks of sexual exploitation and abuse, and also sexual harassment. This is particularly important to prevent as it may further undermine women's access to health services. To mitigate against these risks a GBV Action Plan will be developed, In addition, channels for reporting SEA/SH will be integrated into grievance mechanisms. Inclusive and appropriate engagement of communities throughout



the project is essential, particularly of sensitive services e.g. family planning, and awareness raising and engagement of men, elders, religious leaders, all ages of women and traditional health providers and birth attendants will be necessary to ensure support.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The project will support the construction/rehabilitation/expansion of a limited number of health clinics and laboratories, which might entail land acquisition resulting in physical/economic displacement. To mitigate against this risk, the project will prepare a Resettlement Policy Framework (RPF). Once the specific construction sites are identified, the framework will, if necessary, be expanded into specific Resettlement Action Plans (RAPs) proportionate to potential risks and impacts.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The ESMF will provide guidance on screening and mitigation measures to ensure that project activities do not alter or cause destruction of any critical or sensitive natural habitats.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

This standard is not relevant as there are no Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the project area of influence.

ESS8 Cultural Heritage

This standard is not relevant at this time as the limited civil works are unlikely to affect cultural assets. The ESMF will include measures for “Chance Finds” of archaeological or other cultural heritage.

ESS9 Financial Intermediaries

This is not relevant as it is not an FI operation.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	Yes
OP 7.60 Projects in Disputed Areas	Yes

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE

Public Disclosure



A. Is a common approach being considered?

No

Financing Partners

n/a

B. Proposed Measures, Actions and Timing (Borrower’s commitments)

Actions to be completed prior to Bank Board Approval:

- Preparation and disclosure of Environmental and Social Commitment Plan (ESCP)
- Preparation, consultation and disclosure of the Stakeholder Engagement Plan (SEP), including GRM
- Preparation of Labor Management Procedures (LMP)
- Preparation, consultation and disclosure of Resettlement Policy Framework (RPF)
- Preparation of Environmental and Social Management Framework (ESMF) and disclosed in the country and the Bank external website prior to appraisal
- Preparation of a Health Care Waste Management Plan and disclosed in the country and the Bank external website prior to appraisal

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):

- Implementation of SEP incl. GRM
- Implementation of LMP

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

15-Apr-2020

IV. CONTACT POINTS

World Bank

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Borrower/Client/Recipient

Borrower: The Gambia

Implementing Agency(ies)

Implementing Agency: Ministry of Health

V. FOR MORE INFORMATION CONTACT

Public Disclosure



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VI. APPROVAL

Task Team Leader(s):	Samuel Lantei Mills
Practice Manager (ENR/Social)	Aly Zulficar Rahim Recommended on 11-Mar-2020 at 09:07:22 EDT
Safeguards Advisor ESSA	Hanneke Van Tilburg (SAESSA) Cleared on 20-Apr-2020 at 16:37:6 EDT