

**The Republic of Trinidad and Tobago
Ministry of Health**

**Trinidad and Tobago: COVID-19 Emergency
Response Project (P173989)**

**Draft Version
June 11 2020**

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

[Date of Negotiations June xx, 2020]

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Trinidad and Tobago (hereafter, the “Borrower”) will implement the Trinidad and Tobago: COVID-19 Emergency Response Project (the **Project**) through the Ministry of Health and its Project Implementation Unit (PIU). The International Bank for Reconstruction and Development (hereinafter, the “Bank”) has agreed to provide financing for the Project.
2. The Borrower 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 Borrower is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry or unit referenced in one above.
4. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by the Borrower as required by the ESCP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
5. As agreed by the Bank 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 will agree to the changes with the Bank 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 Bank and the Borrower through the Minister of Health. The Ministry of Health will promptly disclose the updated ESCP.
6. Where there are Project changes, unforeseen circumstances, or Project performance results 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
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>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 the implementation of the ESCP, status of preparation and implementation of E&S documents required under the ESCP, stakeholder engagement activities, and grievance log.</p>	<p>Quarterly reporting throughout Project implementation submitted within the 45 days after the end of each reporting report.</p> <p>Mid-term and completion reports will also be submitted, as requested by the Bank, during Project implementation.</p>	<p>Project Implementation Unit (PIU) within the Ministry of Health (MoH)</p>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>The PIU already established under the Ministry of Health (MoH) will be responsible for implementation of the Project. MoH will hire and maintain throughout Project implementation one (1) qualified environmental and social specialist with qualifications and experience acceptable to the Bank. In addition, MoH has already assigned and shall maintain officials as Environmental Focal Point and Social Focal Point. MoH will ensure adequate time of the specialist and the Focal Points for the Project's environmental and social risk management. The Project Coordinator will be overall responsible for coordinating the environmental and social issues with the support of environmental and social specialist and focal points. MoH will also convene a technical oversight committee with the relevant technical lead for Environmental and Social risk management.</p> <p>Adequate resources will be allocated to support management of ESHS risks of the Project.</p>	<p>An environmental and social specialist will be contracted or assigned no later than 30 days after the Effective Date. The specialist and the focal points will be retained throughout Project implementation.</p>	<p>PIU/ MoH, and Technical Oversight team</p>

<p>1.2</p>	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT AND ENVIRONMENTAL AND SOCIAL MANAGEMENT PLANS</p> <p>a. Ensure, document and certify that adequate waste management practices, appropriate laboratory facilities and completion of key staff training on the use of the supplies and equipment following the Trinidad and Tobago’s ‘Code of Practice for Bio-Medical Waste Management’ and ‘Occupational Safety and Health Management Policy’ and WHO Guidelines for medical waste management for any retroactive financing, in a manner consistent with the ESSs.</p> <p>b. Prepare, adopt and implement interim health and safety guidelines consistent with the ESSs.</p> <p>c. Assess the environmental and social risks and impacts of proposed Project activities, in accordance with ESS1 and the ESMF to be prepared 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. The ESMF should also build on a comprehensive review of the Code of Practice for Bio-Medical Waste Management and an assessment/audit of relevant incinerator facilities to determine whether they currently meet WB/WHO standards. The ESMF should identify critical gaps (if any) and suggest appropriate measures to overcome the gaps.</p> <p>d. Prepare, disclose, adopt, and implement an Environmental and Social Management Plan (ESMP), Medical Waste Management Plan (MWMP), Community Health and Safety Plan (CHSP), and any other 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, and other relevant Good International Industry Practice (GIIP) including relevant WHO Guidelines on COVID-19.</p> <p>e. 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 Environmental, Social, Health and Safety (ESHS) measures, into the ESHS specifications of the procurement documents and contracts with suppliers. Thereafter ensure that the suppliers comply with the ESHS specifications of their respective contracts.</p>	<p>a. Throughout the retroactive financing period.</p> <p>b. Prepared by negotiations and implemented until the approval of the ESMF.</p> <p>c. ESMF, acceptable to the Bank, to be adopted within 30 days of the Effective Date. No activities that have any potential environmental and social risks and impacts will be initiated within this period. Assessment to be conducted before the carrying out of the relevant Project activities.</p> <p>d. Plans or instruments prepared before the carrying out of the relevant Project activities, and thereafter implemented throughout the carrying out of such activities.</p> <p>e. Before initiating the procurement process for the relevant activities and thereafter throughout the implementation of such Project activities.</p>	<p>PIU/MoH</p>
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	<p>EXCLUSIONS:</p> <p>Exclude the following types 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 (e.g. loss of major natural habitat) adverse impacts. • Activities that have high probability of causing serious adverse effects to human health and/or the environment not related to COVID-19 treatment. • Activities that may have significant adverse social impacts and may give rise to significant social conflict. • Activities that may involve any resettlement or land acquisition/use restriction 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.c. above.	PIU/MoH
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>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:</p> <ul style="list-style-type: none"> • Implementing adequate occupational health and safety measures (including emergency preparedness and response measures) • Confirming existing grievance arrangements for health workers and any other Project workers. • Incorporating labor requirements into the ESHS specifications of the procurement documents. <p>The Borrower shall adopt and implement Labor Management Procedures (LMP) incorporating the relevant requirements of ESS2.</p>	Throughout Project implementation. The LMP will be prepared as part of the ESMF which will be finalized 30 days after the Effective Date, until then the recommendations referenced in the interim guidelines for workplace safety and infection control will apply.	PIU/MoH
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.1	<p>MEDICAL AND HAZARDOUS WASTE MANAGEMENT:</p> <p>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 including appropriate selection and safe usage and disposal of personal protective equipment (PPE) and relevant medical evaluation and health surveillance of PPE users. The PIU/MoH will adopt the proven technology and procedure on medical waste management including auditing for appropriate treatment and disposal. Given the potential resource scarcity in the face of an outbreak, the PIU/MoH will commit to the provision of services and supplies based on the urgency of the need, in line with the latest data related to the prevalence of the cases.</p>	Throughout Project implementation.	PIU/MoH
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>COMMUNITY HEALTH AND SAFETY</p> <p>a) 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; to ensure that the public is safe from potential wastes, especially disposed biohazardous materials and PPE.; risk associated with visits to health centers; and 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.</p> <p>b) A Community Health and Safety Plan will be developed by the Recipient as part of the ESMF.</p>	<p>a) Throughout Project implementation</p> <p>b) Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.</p>	PIU/MoH

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.2	<p>OTHER COMMUNITY HEALTH AND SAFETY ISSUES</p> <p>a) The Borrower will put measures in place to prevent or minimize the spread of the infectious disease/COVID-19 to the community.</p> <p>b) The Borrower will implement emergency preparedness measures in case of laboratory accidents/ emergencies e.g. a fire response or natural phenomena event. The Borrower will operate quarantine and isolation centers in line with the applicable requirements of ESS4, the World Bank Group Environmental, Health and Safety Guidelines (ESHGs) and other relevant GIIP including the WHO guidelines on “Key considerations for repatriation and quarantine of travelers in relation to the outbreak of novel coronavirus 2019-nCoV”.</p>	<p>a) Throughout Project implementation</p> <p>b) Same timeframe as for the preparation and implementation of the ESMPs, under action 1.2.</p>	PIU/ MoH
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
	ESS5 is not currently relevant.		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	ESS6 is currently not relevant		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	ESS7 is currently not relevant.		
ESS 8: CULTURAL HERITAGE			
	ESS8 is currently not relevant.		
ESS 9: FINANCIAL INTERMEDIARIES			
	ESS 9 is currently not relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			

10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Prepare, disclose, consult, update, adopt and implement Stakeholder Engagement Plan (SEP), in a manner acceptable to the Bank, to establish measures to allow for a continuous engagement and adequate communication strategies with relevant stakeholders throughout Project implementation.</p>	<p>A draft SEP was already prepared will be disclosed prior to project appraisal.</p> <p>The Draft shall be revised no later than 30 days following the Effective Date, and after public consultations have been held. The SEP shall be implemented throughout Project implementation.</p> <p>Once approved by the Bank the revised SEP will be publicly disclosed by the Borrower on an online easy to access location.</p>	PIU/MoH
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>The Ministry of health will maintain the existing grievance redress mechanism (GRM) to be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10 as described in the SEP.</p>	<p>The existing GRM arrangements are described in the SEP which will be adopted no later than 30 days after the Effective Date. The GRM is already in place and will be maintained and implemented throughout Project implementation.</p>	PIU/MoH
CAPACITY SUPPORT (TRAINING)			
CS1	<p>Provide capacity support including training for PIU staff based on identified need to support the management of ESHS risks and impacts of the Project.</p>	Throughout Project implementation.	PIU/MoH