

Republic of Sudan

**Sudan COVID-19 Emergency Response
Project**

Additional Financing (P176824)

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

May 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Sudan (hereinafter the Recipient) shall implement the Sudan COVID-19 Response Project Additional Financing (the **Project**), with the involvement of the Federal Ministry of 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. 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.
4. 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 through its delegated representatives from the Federal Ministry of Health 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.
5. 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	<p>REGULAR REPORTING:</p> <p>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.</p>	Quarterly throughout the Project implementation period	Federal Ministry of Health (FMOH) through Project Implementation Unit (PIU)
B	<p>INCIDENTS AND ACCIDENTS:</p> <p>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, including, inter alia, any COVID-19 outbreak in the Project area. Provide sufficient detail regarding the incident or accident, 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>Notify the Association within 48 hours after learning of the incident or accident</p> <p>A report shall be provided within a timeframe acceptable to the Association, as requested</p>	FMOH through PIU
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>The Federal Ministry of Health (FMOH) shall establish and maintain a Project Management Unit (PIU) with qualified staff and resources to support management of ESHS risks and impacts of the Project including an environmental and social safeguard specialist, a risk communication specialist, and a monitoring and evaluation specialist.</p>	<ul style="list-style-type: none"> - PIU has been established and shall be maintained throughout Project implementation - A Project Manager and an Environmental and Social Specialist have been appointed and maintained throughout project implementation. - Other specialists shall be appointed before carrying out of relevant project activities 	FMOH

<p>1.2</p>	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS</p> <p>a. Assess the environmental and social risks and impacts of proposed Project activities, in accordance with the Social Impact Assessment (SIA), and the Environmental and Social Management Framework (ESMF), to be prepared, disclosed, consulted and adopted for the Project, the ESSs, the Environmental, Health and Safety Guidelines (EHSs), and other relevant Good International Industry Practice (GIIP), including relevant World Health Organization (WHO) guidelines.</p> <p>b. Prepare, disclose, consult, adopt, and implement any environmental and social management plans (including a template for Infection Control and Waste Management Plan (ICWMP) and a template for Environmental and Social Management Plan (ESMP)), instruments or other measures required for the respective Project activities as required by the assessment process, in accordance with the ESSs, the ESMF, the EHSs and other relevant Good International Industry Practice (GIIP), including relevant WHO Guidelines, to, inter alia, ensure access to and allocation of Project benefits (COVID-19 vaccines in particular) 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, including, as relevant, with regards to vaccines.</p> <p>c. 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>d. 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>e. As part of the SIA, ensure the avoidance of any form of Gender Based Violence (GBV)/ Sexual Exploitation and Abuse (SEA)/ Sexual</p>	<p>a. The ESMF and SIA for the parent project has been prepared, disclosed, consulted and adopted. Both shall be updated to reflect Project activities (before Project Effectiveness for ESMF, and before project disbursement for SIA), and thereafter implemented and updated as necessary throughout Project implementation.</p> <p>b. Plans/instruments shall be prepared, disclosed, consulted and before the carrying out of the relevant Project activities, and thereafter implemented throughout the carrying out of such activities.</p> <p>c. The relevant ESHS measures shall be incorporated into the procurement documents before launching the procurement process for the relevant Project activities, including vaccine related procurement, and shall thereafter, be complied with throughout the carrying out of such activities.</p> <p>d. Before the carrying out of the relevant Project activities and vaccination campaign, and thereafter implemented throughout the carrying out of such activities.</p>	<p>FMOH through PIU</p>
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	Harassment (SH) by requiring all health and non-health Project workers to sign the WHO Code of Ethics and Professional conduct, including Project workers involved with screening, quarantine, isolation, and vaccination facilities and centers.	e. Signing procedure adopted on timeframe specified in 1.2.a, and signing to take place immediately upon deployment for the Project activities.	
1.3	<p>EXCLUSION:</p> <p>Exclude the following type of activities as ineligible for financing under the Project:</p> <ul style="list-style-type: none"> • Laboratory activities that may require BSL3 lab facilities • Activities that may cause long term, permanent and/or irreversible adverse impacts (e.g. loss of major natural habitat) • Activities that have a high probability of causing serious adverse effects to human health and/or the environment not related to vaccination against, and treatment of COVID-19 cases • Activities that may have significant adverse social impacts and may give rise to significant social conflicts • Activities which would require Free Prior Informed Consent (FPIC) under ESS7 • Activities that may affect lands or rights of underserved people or other vulnerable minorities • Activities that may involve permanent resettlement or land acquisition, and adverse impacts on cultural heritage • All the other excluded activities set out in the ESMF and SIA of the Project 	During the environmental and social assessment process conducted under action 1.2.a. above.	FMOH through PIU
ESS 2: LABOR AND WORKING CONDITIONS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	<p>LABOR MANAGEMENT:</p> <p>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 (PPE), and 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.</p>	Throughout Project implementation, including those of AF activities	FMOH through PIU
2.2	Update, adopt, and implement the Labor Management Procedures (LMPs) developed for the Project, as a stand-alone document and consistent with ESS2 requirements	LMPs have been prepared, consulted, and adopted as part of the parent project. These LMPs shall apply to the Project as well and shall be updated in alignment with and before the same date as the ESMF and as necessary throughout Project implementation to account for Project-related activities, including where the pandemic situation changes in a way that affects Project workers.	FMOH through PIU
2.3	Ensure a non-discriminatory, decent work environment; including by ensuring that all health workers sign and fully adhere to the WHO Code of Ethics and Professional conduct.	Throughout Project implementation, including vaccination program	FMOH through PIU
2.4	Ensure all workers are adequately trained on and abide by the WHO professional code of conduct throughout the Project period	Throughout Project implementation, including vaccination program	FMOH through PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.1	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 EHSGs, and other relevant GIIP and relevant WHO guidelines; and adequately manage and dispose of health care wastes (including, vaccines) and other types of hazardous and non-hazardous wastes, such as wastes of photovoltaic panels, backup batteries, and solar direct device refrigerators.	Throughout Project implementation, including vaccination program	FMOH through PIU

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; 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, sexual harassment, and targeting and exclusion issues as connected to vulnerability characteristics.	Throughout Project implementation, including vaccination program	FMOH through PIU
4.2	Operate screening, quarantine, isolation, testing, and treatment centers in accordance with WHO guidelines on “Key considerations for repatriation and quarantine of travelers in relation to the outbreak of novel coronavirus 2019-nCoV”	Throughout Project implementation, including vaccination program	FMOH through PIU

<p>4.3</p>	<p>GBV/SEA/SH AND CONFLICT RISKS:</p> <ul style="list-style-type: none"> • Provide gender-sensitive infrastructure such as segregated toilets and enough light in screening, quarantine, isolation, and vaccination centers • Operate all Project screening, quarantine, isolation, and vaccination facilities and centers in a conflict-sensitive manner, avoiding any aggravation of local communal conflicts, including between host communities and refugees/ Internally Displaced Persons (IDPs). 	<p>Throughout Project implementation, including vaccination program</p>	<p>FMOH through PIU</p>
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<p>4.4</p>	<p>USE OF SECURITY PERSONNEL:</p> <p>The following measures shall be adopted to ensure that the engagement of security personnel in the implementation of Project activities for provision of security to Project workers, sites and/or assets, is carried out in accordance with the ESSs:</p> <ul style="list-style-type: none"> a. Assess the risks and impacts of engagement of the security or military personnel, as part of the assessment referred to in action 1.2 a) above, and implement measures to manage such risks and impacts, including a stand-alone Security Management Plan satisfactory to the Association and guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such security personnel; b. Adopt and enforce standards, protocols and codes of conduct for the selection and use of security personnel, and screen such personnel to verify that they have not engaged in past unlawful or abusive behavior, including sexual exploitation and abuse, sexual harassment or excessive use of force; c. Ensure that the Project's PIU enters into a memorandum of understanding (MoU) with the Ministry of Interior setting out the arrangements for the engagement of the security personnel under the Project, including compliance with the relevant requirements of this ESCP; d. Ensure that such personnel are adequately instructed and trained, prior to deployment and on a regular basis, on the use of force and appropriate conduct (including in relation to civilian-military engagement, SEA and SH, and other relevant areas), as set out in the Project Operational Manual, the ESMF, the Security Management Plan, and the MoU; e. Ensure that the stakeholder engagement activities under the Stakeholder Engagement Plan (SEP) include a communication strategy on the involvement of security personnel under the Project; f. Ensure that any concerns or grievances regarding the conduct of security personnel are received, monitored, documented (taking into 	<ul style="list-style-type: none"> a) Assessment carried out in the same timeframe as in action 1.2 a) above and a stand-alone Security Management Plan shall be prepared and adopted before deploying security personnel under the Project and thereafter implemented throughout Project implementation. b), c) and d) before deploying security personnel under the Project and thereafter throughout Project implementation, including vaccination activities. e) and f) as set out under actions 10.1 and 10.2 respectively. g) within the timeframes requested by the Association 	<p>FMOH through PIU + Ministry of Interior according to the MoU</p>
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	<p>account the need to protect confidentiality), resolved through the Project's grievance mechanism (see action 10.2 below) and reported to the Association no later than 48 hours after being received; and</p> <p>g. Where the Association shall require, after consultation with the Recipient: (i) promptly appoint a third- party monitor consultant, with terms of reference, qualifications and experience satisfactory to the Association, to visit and monitor the Project area where security personnel are deployed, collect relevant data and communicate with Project stakeholders and beneficiaries; (ii) require the third-party monitor consultant to prepare and submit monitoring reports, which shall be promptly made available to and discussed with the Association; and (iii) promptly take any actions, as may be requested by the Association upon its review of the third-party monitor consultant reports.</p>		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>Not currently relevant. However, should the need arise for the Project to acquire land, appropriate environmental and social instruments shall be prepared and implemented in accordance with ESS5 and to the satisfaction of the Association.</p>	<p>Any plans to be prepared and cleared by the Association before any displacement of local populations affected by the Project.</p>	-
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>Relevant aspects of this standard shall be considered, as needed, under action 1.2 above.</p>	<p>Throughout Project implementation.</p>	<p>FMOH through PIU</p>
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			

7.1	<p>MEASURES FOR INDIGENOUS PEOPLES:</p> <p>The Project shall be carried out in accordance with the applicable requirements of ESS7, including, inter alia: (i) ensuring that the Stakeholder Engagement Plan (SEP) includes meaningful consultations with indigenous peoples throughout Project implementation; (ii) implementing procedures, protocols and/or other measures to ensure that indigenous peoples have access to Project benefits in a fair, equitable, inclusive and culturally appropriate manner, including, as relevant, with regards to vaccines, screening, quarantine, isolation, and treatment centers, as well as set out in the ESMF and the SEP; and (iii) implementing measures to ensure that indigenous peoples are able to access the Project’s grievance mechanism in a culturally appropriate manner. SIA and SEP provide the process and the information on how communities falling under ESS7 will fully participate and benefit from the Project in culturally appropriate manner</p>	Throughout Project implementation, including vaccination program	FMOH through PIU
ESS 8: CULTURAL HERITAGE			
	Not currently relevant. However, should the need arise for the Project to engage in construction or rehabilitation activities, environmental and social instruments shall be prepared and implemented in accordance with ESS8 and to the satisfaction of the Association.	Any plans to be prepared and cleared by the Association before any construction or rehabilitation activities under the Project.	-
ESS 9: FINANCIAL INTERMEDIARIES			
	Not relevant.	-	-
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN:</p> <p>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>	An updated SEP was already prepared and disclosed, and shall be consulted, implemented, and updated throughout Project implementation.	FMOH through PIU

10.2	<p>STAKEHOLDER ENGAGEMENT INFORMATION AND DISCLOSURE: Adopt measures, as set out in the ESMF, to ensure that the carrying out of Project activities includes stakeholder engagement and information disclosure consistent with ESS10, including 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>	Throughout Project implementation	FMOH through PIU
10.3	<p>CASE MANAGEMENT: In line with the SEP, the Project shall ensure systematic COVID-19 case management, including by allowing communication between quarantined people and their relatives.</p>	Throughout Project implementation, including vaccination program	FMOH through PIU
10.4	<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 exclusion and discrimination, as well as those related to 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> <p>The grievance mechanism shall also receive, register and address concerns arising from unintended health consequences after vaccination especially those resulting in serious adverse effects, [and, as appropriate, requests for compensation].</p>	Throughout Project implementation, including vaccination program	FMOH through PIU
CAPACITY SUPPORT (TRAINING)			

CS1	<p>Project Implementation Unit and other relevant implementing support staff responsible for the Project to receive training on the Project’s ESHS plans and instruments, fair, equitable and inclusive access and allocation of Project benefits, including with regards to vaccines, hazardous and non-hazardous waste management, and the roles and responsibilities of different key agencies in the ESF implementation.</p>	<p>Immediately upon workers joining the Project, and thereafter periodically with the addition of new Project team members, who shall join the Project throughout implementation.</p>	FMOH
	<p>Training topics for personnel involved in Project implementation shall include, among others:</p> <ul style="list-style-type: none"> ▪ Categorizing, targeting, and following up procedures ▪ 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 on quarantine including case management ▪ Prevention of gender-based violence including risks of Sexual Exploitation and Abuse as well as Sexual Harassment 	<p>Throughout Project implementation.</p>	FMOH