

**Kingdom of Lesotho
Ministry of Health
Lesotho Nutrition and Health System
Strengthening Project (P170278)**

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

DECEMBER 2019

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Lesotho (GoL) is implementing the Lesotho Nutrition and Health System Strengthening Project (LNHSSP or the Project) with the International Development Association's (hereinafter the Association) financial and technical support. The GoL is implementing LNHSSP under the leadership of the Ministry of Health (MoH), with the involvement of the following Ministries and Agencies: Ministry of Finance, Ministry of Agriculture and Food Security, Ministry of Education and Training, Ministry of Social Development, Ministry of Planning, Ministry of Water as well as the Food and Nutrition Coordination Office. The Association has agreed to provide financing, implementation support and monitoring for the Project.
2. The GoL will implement material measures and actions so that the Project is implemented in accordance with the World Bank 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 GoL will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as the Environmental and Social Management Framework (ESMF), related Labor Management Procedures (LMP), GBV/SEA prevention and mitigation measures, and Stakeholders Engagement Plan (SEP), and the timelines specified in those E&S documents. Other plans, as and when needed, will be developed during Project implementation, including sub-project specific Environmental and Social Management Plans (ESMPs).
4. The GoL is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the relevant participating ministries/agencies/units referenced in paragraph 1 above, including the Project Implementation Unit (PIU).
5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Association by the GoL as required by the ESCP and the conditions of the legal agreement. The Association will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.
6. As agreed by the Association and the GoL, this ESCP may be revised from time to time during Project implementation, to reflect adaptive management of the Project changes and unforeseen circumstances or in response to assessment of Project performance conducted under the ESCP itself. In such circumstances, the GoL 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 GoL as applicable. The GoL will promptly disclose the updated ESCP.
7. Where Project changes, unforeseen circumstances, or Project performance result in changes to the risks and impacts during Project implementation, the GoL shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include risks and impacts that are relevant to the Project, such as environmental, social, health, and safety impacts.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>The GoL, through the Project Implementation Unit (PIU), will prepare and submit to the Association regular environmental and social monitoring reports presenting the state of compliance of the Project, including but not limited to the implementation of the ESCP and, particularly, in relation to the preparation and implementation of the environmental and social management tools and actions referenced in Section 1.2 below.</p>	<p>Quarterly Reporting throughout project implementation</p>	<p>Project Implementation Unit:</p> <ul style="list-style-type: none"> • Project Coordinator • Environmental & Social Specialist • Monitoring & Evaluation officer
B	<p>INCIDENTS AND ACCIDENTS</p> <p>The GoL will promptly notify the Association of any incidents or accidents related to or having an impact on the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including risks based on the environmental and social assessment. Indicative examples: any Project-related accidents or fatalities, labour unrest or Project-related allegations of gender-based violence. The GoL will provide sufficient detail regarding the incident or accident, indicating immediate measures taken to address it, including any information provided by any supervising entity, as appropriate. Subsequently, as per the Association's request, the GoL will prepare a report on the incident or accident and propose any measures to prevent its recurrence.</p>	<p>Promptly, and no later than 48 hours after taking notice of such accidents or incidents and in line with the World Bank's Environment and Social Incidence Response Toolkit (ESIRT).</p> <p>Maintained throughout Project implementation.</p>	<p>Project Implementation Unit:</p> <ul style="list-style-type: none"> • Project Coordinator • Environmental & Social Specialist
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>The GoL will maintain an organizational structure of the current Southern African Tuberculosis Health System Support (SATBHSS) Project Implementation Unit (PIU) as the implementing unit for the LNHSSP with qualified staff and resources to support management of environmental and social risks throughout implementation period.</p> <p>The PIU will recruit a dedicated Environmental and Social Specialist (ESS) responsible for overseeing identification and management of environmental and social risks and impacts.</p>	<p>Proper arrangements will be established to maintain the SATBHSS PIU before start of the Project and retain the E&S staff throughout project implementation.</p> <p>Recruitment of dedicated ESS within 30 days after project effectiveness and maintained throughout project implementation</p>	<p>Ministry of Health PIU Project coordinator</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1.1	The GoL will ensure that the Project recruits experienced and qualified Gender and Social Standards Specialist (GSSS) and Community Liaison Officers (CLOs) to ensure compliance with the ESSs.	Recruitment: Before the start of the project and no later than 30 days after project effectiveness.	PIU: Project Coordinator, E&S specialist
1.1.2	The GoL will ensure, by means of the PIU Project Coordinator, that the ESS and the GSSS conduct their environmental and social management tasks for the Project in terms of: ensuring preparation and dissemination of the ESMF and related tools and the SEP to key stakeholders; screening activities; ensuring incorporation of the environmental and social aspects into tender documents and monitoring effective implementation of environmental and social management instruments.	Prior to Board Decision. Supervision from beginning of the Project for the preparation of environmental and social instruments (as needed), each of which shall be completed prior to activities being implemented at affected sub-project site(s).	PIU: Project Coordinator, E&S specialist
1.2	<p>MANAGEMENT TOOLS AND INSTRUMENTS</p> <p>The GoL will develop, disclose and implement the following tools and instruments, as required, in a manner acceptable to the Association:</p> <ul style="list-style-type: none"> • Environmental and Social Management Framework (ESMF) including: <ul style="list-style-type: none"> ○ Labor Management Procedures (LMP), ○ GBV/SEA Risk assessment and Action Plan ○ Change Find procedures for possible cultural heritage • Stakeholders Engagement Plan (SEP) incorporating the Grievance Redress Mechanism (GRM) 	<p>ESMF incorporating Labor Management Procedures (LMP) and GBV/SEA management plan will be finalized and disclosed before appraisal.</p> <p>Management Tools and Instruments to be implemented throughout the project implementation.</p> <p>SEP to be finalized and disclosed prior to project appraisal and implemented throughout the project implementation.</p>	<p>PIU-ESS</p> <p>PIU: Project Coordinator</p>
1.2.1	As and when needed, pursuant to the ESMF, sub-project specific Environmental and Social Management Plans will be developed and disclosed during project implementation., in a manner acceptable to the Association.	Before the start of any activities requiring the preparation of sub-project E&S instruments.	<p>PIU-ESS</p> <p>PIU: Project Coordinator</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
		ESMPs will be submitted to the Bank for approval before launching the bidding process for the respective subprojects. Once approved, the ESMPs will be carried out throughout Project implementation.	
1.2.2	<p>PERMIT, CONSENTS AND AUTHORIZATION: The GoL will:</p> <ul style="list-style-type: none"> • obtain or assist in obtaining, as appropriate, the permits, consents and authorizations that are applicable to the Project from relevant national authorities, pursuant to applicable national laws. • Comply or cause to comply, as appropriate, with the conditions established in these permits, consents and authorizations throughout Project implementation 	<p>Before the start of any project activities requiring the issuance of a specific permit.</p> <p>Within the timeline set out in the permits, consents and authorizations.</p> <p>Throughout Project implementation</p>	PIU Project Coordinator
1.3	<p>The GoL will draft a project implementation manual (PIM) (or procedures manual) with the environmental and social standards' section describing in detail:</p> <ul style="list-style-type: none"> o The role of the Environmental and Social Specialist and the GSSS in preparing the environmental and social standard's sections to be included in the ToRs, tender documents and works contracts, o The minimum environmental and social clauses to be included in the ToRs and tender documents (including codes of good conduct, coordination, reporting and monitoring, and grievance redress mechanisms), o The Environmental and Social indicators to be incorporated into the monitoring and evaluation system, and Completion timeframes 	<p>The PIU will draft PIM and ToRs and tender documents prior to commencement of project activities</p> <p>Implementation of the E&S management tools and instruments required throughout Project Implementation.</p>	
ESS 2: LABOR AND WORKING CONDITIONS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	<p>LABOR MANAGEMENT PROCEDURES Labor Management Procedures (LMP) prepared as part of the ESMF and to be disclosed prior to appraisal. The LMP will be updated to include requirements of OHS plans and will align with the World Bank Group’s Environment, Health and Safety Guidelines (EHSGs), the industry sector EHSGs for Health Care Facilities and other good international industry practice (GIIP).</p>	<p>The LMP prepared as part of the ESMF to be finalized prior to Project Appraisal and implemented throughout project cycle</p>	<p>PIU-ESS Project coordinator</p>
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS: Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with the World Bank’s ESS2. Measures for prevention and mitigation of GBV/SEA risks involving project workers will be put in place before project effectiveness.</p>	<p>Finalized prior to commencement of Project activities and maintained during project implementation.</p>	<p>PIU-ESS Project coordinator</p>
2.3	<p>EMERGENCY PREPAREDNESS AND RESPONSE: The GoL will develop/improve and implement an Emergency Preparedness and Response Plan in line with the World Bank’s Environment and Social Incidence Response Toolkit (ESIRT) and the GoL will immediately report any major emergencies to the Bank within 24 hours.</p>	<p>Prepared and updated prior to commencing Project activities. Throughout Project implementation</p>	<p>Consultants, E&S specialist</p>
2.4	<p>PROJECT WORKERS TRAINING: The GoL, via the PIU, will work with Project contractors/service providers to organize training for workers to ensure better management of the implementation risks for local communities. The training will focus on creating awareness on environmental and social risks, code of conduct and mitigation measures.</p>	<p>Training to be conducted throughout project implementation</p>	<p>PIU, E&S specialist, contractors/service providers</p>
2.5	<p>OHS BASELINE RISK ASSESSMENT: The GoL will conduct OHS baseline risk assessment in line with the project activities and proposed control measure to mitigate risks.</p>	<p>Prior to the start of project activities and maintained throughout project implementation</p>	<p>PIU, E&S specialist</p>
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>MANAGEMENT OF WASTE AND HAZARDOUS MATERIAL</p>	<p>ICWMP reviewed prior to appraisal and implemented throughout Project implementation</p>	<p>PIU & E&S specialist</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	The GoL will review and update the improvement of the Consolidated Lesotho National Health Care Waste Management Plan of 2012, i.e. the Infection Control and Waste Management Plan (ICWMP), of 2016 together with its Standard Operating Procedures (SOPs) to meet ESF requirements, if necessary, and implemented to manage health care waste during project implementation.		
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>COMMUNITY HEALTH AND SAFETY: The GoL will prepare, adopt, and implement measures and action to assess and manage specific risks and impacts to the community arising from Project activities [including, inter alia behavior of Project workers, risks associated with labor influx, GBV/SEA risks, handling of medical health care waste in health facilities, response to emergency situations], and include the mitigation measures in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Bank.</p> <p>The sub-project specific Environmental and Social Management Plans will include mitigation measures to address community health and safety risks and impacts as well as site specific emergency preparedness and response activities, resources and responsibilities.</p>	Prior to commencement of Project activities and implemented throughout Project implementation.	PIU & E&S specialist
4.2	<p>GBV AND SEA RISKS: The GoL will conduct a Gender-Based Violence (GBV) analysis and develop and implement a GBV Action Plan. This will include:</p> <ul style="list-style-type: none"> Measures and actions to assess and manage the risks of HIV/AIDS, gender-based violence (GBV) and sexual exploitation and abuse (SEA) as part of LMP and ESMP. Awareness raising on grievance/feedback processes for reporting SEA a& GBV cases. Engage a qualified institution to conduct community and workers' training and awareness on HIV/AIDS, GBV & SEA. 	Prior to commencement of Project activities and implemented throughout Project implementation	PIU & E&S specialist Consultant
ESS 8: CULTURAL HERITAGE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
8.1	<p>CHANCE FINDS: The GoL will prepare, adopt, and implement the chance finds procedure as part of the ESMF to be disclosed prior to appraisal.</p>		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION: Update, adopt, and implement Stakeholder Engagement Plan (SEP).</p>	Prior to appraisal.	PIU, E&S specialist
10.2	<p>STAKEHOLDER ENGAGEMENT PLAN IMPLEMENTATION: The GoL will ensure disclosure and implementation of SEP. SEP may be amended and updated as needed during Project implementation. SEP implemented and incorporated into the Project’s management system, adequate staffing and budget allocated to implementing the SEP</p>	Throughout project implementation If during implementation the SEP is considerably modified, a revised SEP will be publicly disclosed as soon as possible.	PIU, E&S specialist, Community Liaison Officers
10.3	<p>PROJECT GRIEVANCE MECHANISM (GRM): The GoL will provide stakeholders with an accessible and inclusive GRM.</p> <ul style="list-style-type: none"> • Prepare and disclose GRM as part of the SEP. • Maintain and operate the GRM as described in the SEP. 	Prior to appraisal. Throughout the project implementation	PIU, E&S specialist, Community Liaison Officers
CS1	<p>The GoL will design and implement targeted training for the PIU and other entities responsible for Project implementation, focused on the ESF including but not limited to:</p> <ul style="list-style-type: none"> • Stakeholder mapping and engagement • Specific aspects of environmental and social assessment • Emergency preparedness and response • Community health and safety and other relevant contents related to the Project scope of work. 	1st year and throughout project duration	PIU & E&S specialist