

**Republic of Malawi  
Ministry of Health  
Malawi Emergency Operation to Protect  
Essential Health Services (P180231)**

**ENVIRONMENTAL AND SOCIAL  
COMMITMENT PLAN (ESCP) for Negotiations  
DRAFT  
November 2022**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of Malawi (the Recipient), through the Ministry of Finance and Economic Affairs will implement the Malawi Emergency Operation to Protect Essential Health Services (P180231) (the Project), with the involvement of the Ministry of Health, as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the referred agreement(s).
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Financing Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement(s).
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through the Ministry of Health, the Ministry of Finance and Economic Affairs, and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></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 the implementation of the ESCP, status of preparation and implementation of E&amp;S instruments required under the ESCP, including the ESMP, LMP and stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>	Submit quarterly reports to the Association throughout Project implementation. Submit each report to the Association no later than 15 days after the end of each reporting period.	PIT
B	<p><b>INCIDENTS AND ACCIDENTS</b></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, cases of sexual exploitation and abuse (SEA), sexual harassment (SH) and accidents that result in death, serious or multiple injury. Provide sufficient detail regarding the scope, severity, and possible causes of 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/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association's request, prepare a report on the incident or accident and propose any measures to address it and prevent and/or minimize its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association</p>	PIT
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>The Ministry of Health shall establish and maintain a Project Implementation Team (PIT) with qualified staff (based on the ToR to be agreed in the PIM) and resources to support management of ESQOHS risks and impacts of the Project and implement the requirements of the ESMP and SEP, and other instruments for the Project. The Ministry of Finance and Economic Affairs will act as co- chair of the Project Steering committee Where applicable, appropriately qualified staff will be seconded to the PIT until appointment of appropriate staff.</p> <p>The PIT will be maintained for the duration of the project timeframe. The PIT will include qualified staff (based on the ToR to be agreed in the PIM) and resources to support management of ESHS risks and impacts of the Project, including a designated Environmental and Social Safeguards Specialist, and Medical Waste Management Specialist.</p>	Maintain a PIT throughout Project Implementation	MoH and Ministry of Finance

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>1.2 <b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <ol style="list-style-type: none"> <li>1. Prepare, disclose, adopt, and implement the Environmental and Social Management Plan (ESMP) for the Project cleared by the Association, consistent with the requirements specified in the relevant ESSs, Environmental Health and Safety Guidelines (EHSGs), and other relevant Good International Industry Practice (GIIP), including relevant WHO guidelines.</li> <li>2. <b>Due Diligence of Environment, Social, and Quality Management System.</b> The project will undertake a Due Diligence review of Environmental, Social and Quality Management systems (ESQMS) of procurement and distribution of medicines and pharmaceuticals for Health Care Facilities (HCF) (District and Faith-based), Central Medical Stores Trust (CMST), and Disaster Management systems in Malawi to identify gaps and make recommendations for implementation for improvement. The findings of the assessment will help to identify areas to be strengthened in the supply chain system and overall management (supply and demand) of medicine and pharmaceutical distribution, in order to improve inventory management, quality of medicines and pharmaceuticals (e.g., ensured stored correctly, expiry date monitoring, etc.), improved efficiency of supply and stocking of medicines and pharmaceuticals, security, health and safety etc. The assessment will evaluate, inter alia, the current policies and regulations, roles and responsibilities, and standard procedures, demand estimation and supplier selection (quality control of suppliers), quality control management and random testing, storage inventory and distribution (including cold storage and back-up power), guidelines and standards for warehousing/storage of medicines, waste management (including incinerator emissions), security, costing and accessibility (especially for vulnerable groups), and transport and handling of pharmaceuticals, against the requirements of national regulations, the World Bank ESF, EHSGs and GIIP. The assessment will provide a review of gaps between current practices and opportunities for ESQMS strengthening and make recommendations in an action plan for implementation. The assessment will be carried out in accordance with terms of reference acceptable to the Association, and the final review will be submitted to the Association for no-objection.</li> </ol>	<p>1.2.1 The ESMP shall be prepared, consulted upon, adopted, and disclosed, before Effectiveness Date.</p> <p>1.2.2.i Terms of Reference (TOR) for a review of the Environmental, Social and Quality Management System acceptable to the Association, within 30 days of Effectiveness Date.</p> <p>1.2.2.ii Final Due Diligence Review of ESQMS cleared no objection by the Association, within six months after Effectiveness Date.</p>	PIT
<p>1.3 <b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the consultancies, studies, capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms</p>	Throughout Project implementation.	PIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.		
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<b>LABOR MANAGEMENT PROCEDURES</b> Adopt and implement the Labor Management Procedures (LMP) for the Project as part of the ESMP under Action 1.2, consistent with ESS 2 requirements including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response, and procurement of equipment that would strengthen OHS management), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.	The ESMP, including LMP, shall be prepared, consulted upon, adopted, and disclosed, before Effectiveness Date.	PIT
2.2	<b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b> Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	PIT
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<b>WASTE MANAGEMENT PLAN</b> 1. Adopt procedures, protocols and/or other measures to ensure the safe management and disposal of medical waste as set out in the Infection Control and Waste Management Plan (ICWMP) for the Project as part of the ESMP under Action 1.2, including, inter alia, provisions on management and disposal of medical wastes and other types of hazardous, and non-hazardous, wastes and manage/mitigate the potential impacts of pollution to the air, water and land through the management plans set out in the project ESMP.	1. Throughout Project implementation.  2. Due Diligence Review cleared by the Association, by six months after effectiveness date.	PIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	2. As part of the Due Diligence Review in Action 1.2.2, review the current state of, a 15-case sample of each type, health care facility, (HCF) against standards set out in the project ESMP in terms of its incineration, healthcare waste management, infection control procedures, and water resource and wastewater management, as well as develop an action plan to address any identified gaps, including updating HCF general and site-specific infection control and waste management plans and procurement of crucial equipment (such as waste receptacles, bin liners, trollers to move collected waste, etc.) to strengthen waste management.		
3.2	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under Action 1.2 above.	The ESMP shall be prepared, consulted upon, adopted, and disclosed, before Effectiveness Date.	PIT
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>COMMUNITY HEALTH AND SAFETY</b> Assess and manage specific risks and impacts to the community arising from Project activities, and include in the ESMP under action 1.2 above, including, inter alia, transmission of communicable diseases, the potential for community, water resources, biodiversity and natural resources exposure to contamination including from incinerator emissions or open burning, indiscriminate dumping of wastes and/or sludge, and illegal/non-compliant wastewater discharge.	The ESMP shall be prepared, consulted upon, adopted, and disclosed, before Effectiveness Date.	PIT
4.2	<b>SEA AND SH RISKS</b> Adopt and implement a SEA/SH Action Plan as part of the ESMP, to assess and manage the risks of SEA, and SH.	Adopt the SEA/SH Action Plan before effectiveness date and thereafter implement the SEA/SH Action Plan throughout Project implementation.	PIT
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
ESS 5 is not currently relevant to the project, as there will be no land acquisition, restriction on land use and involuntary resettlement.			
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
ESS 6 is not relevant to the project at this time. There will be no land use or civil infrastructure and no impacts on biodiversity conservation or interference with sustainable management of living natural resources. ESS 6 could become relevant if air emissions from incinerators and healthcare wastes are not properly managed in EES3 and ESS4 and could negatively impact on biodiversity and living natural resources. The project's ESMP will consider such risks based on Good International Industry Practice (GIIP) and adequate management of healthcare waste through the Infection Control and Waste Management Plan under ESS3 and ESS4, the appropriate siting, operation and management of incinerators, autoclaves and the ban on open burning included in the Infection Control and Waste Management Plan.			
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
ESS7 is not considered relevant to this project as there are no distinct social and cultural groups in the project area that exhibit characteristics of indigenous or traditionally under-served communities as spelled out under this standard.			
<b>ESS 8: CULTURAL HERITAGE</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 8 is not currently relevant to the project			
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
ESS 9 is not currently relevant to the project			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b> Update, disclose, adopt, and implement the Stakeholder Engagement Plan (SEP) prepared for the Malawi COVID-19 Emergency Response and Health Systems Preparedness Project (P173806) to cover activities under this Project, 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.	Adopt the SEP prior to the first disbursement of funds, and thereafter implement the SEP throughout Project implementation.	PIT
10.2	<b>PROJECT GRIEVANCE MECHANISM</b> Maintain, and operate an accessible grievance mechanism, 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. The Project will utilize the GRM established for the Malawi COVID-19 Emergency Response and Health Systems Preparedness Project.  The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.	Maintain and operate the mechanism throughout Project implementation.	PIT
<b>CAPACITY SUPPORT</b>			
CS1	Training will be undertaken for PIT staff and health workers on: <ul style="list-style-type: none"> <li>Stakeholder mapping and engagement</li> <li>Prevention and response to SEA/SH and SEA/SH Grievance Management</li> <li>Occupational Health and Safety</li> <li>Waste management (including, inter alia, transport, handling, storage, disposal, spills)</li> <li>Administration of simulations at workplace</li> </ul>	Annually	PIT