

**REPUBLIC OF CABO VERDE**

**Cabo Verde COVID-19 Emergency Response Project (P175807)**

**Additional Financing (III) (P177181)**

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



June 23, 2021

### ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Cabo Verde (the **Recipient**) under the leadership of the Ministry of Health and Social Security (MHSS) is implementing a Cabo Verde Covid-19 Emergency Response Project (P173857) (the **Parent Project**), for which it has requested a third Additional Financing (the **Project**) (**P177181**). The International Development Association (the **Association**) has agreed to provide financing for the Additional Financing III.
2. Consistent with the logic and design of the parent project, the proposed additional funding (AFIII) will support government efforts to further strengthen its response to the COVID-19 pandemic especially by supporting the purchase and distribution of COVID-19 vaccines. Thus, the Environmental and Social Commitment Plan (**ESCP**) for this Project are largely covered by the ESCP for the Additional Funding on Vaccines (AFII) and remains an appropriate document for this AFIII.
3. 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.
4. 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.
5. 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 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.
6. 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
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING:</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul>	Starting from the Effective date, submit quarterly throughout the Project implementation period.	Cabo Verde Ministry of Health and Social Security (MHSS) and Ministry of Finance (MoF), through the project implementation unit - the <i>Unidade de Gestão de Projetos Especiais</i> (UGPE).
B	<p><b>INCIDENTS AND ACCIDENTS NOTIFICATION</b></p> <ul style="list-style-type: none"> <li>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 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 and/or mitigate the risk of future such incidents. A report of the incident shall be submitted, detailing summary findings of the Root Cause Analysis (RCA).</li> <li>An incident/accident register shall be maintained at all construction sites, throughout the works. Documentation of SEA/SH claims will be maintained separately and in a secure place that can be locked with very limited access.</li> <li>For SEA/SH-related incidents, the survivor should be referred immediately to services following a survivor-centered protocol to be developed as part of the Grievance Mechanism (GM), which will be adapted to manage SEA/SH claims ethically and confidentially.</li> <li>For SEA/SH incidents, reports to the Association regarding these claims must adhere to international norms and best practices regarding the management and sharing of survivor data (WHO Ethical and safety recommendations, 2007; GBVIMS Best Practices). As such, confidentiality should be ensured for the survivor as well as the accused, with no identifying information for either provided.</li> </ul>	<ul style="list-style-type: none"> <li>Notify the Association within 48 hours after learning of the accident or incident. Throughout Project implementation.</li> <li>Subsequently, a report would be provided within a timeframe acceptable to the Association, as requested</li> </ul>	<p>Contractor/ Supervising Entity notifies MHSS/UGPE</p> <p>MHSS/UGPE notifies the Association</p> <p>MHSS/UGPE shall provide subsequent report on the incident or accident within a timeframe acceptable to the Association, as requested.</p>

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C	<p><b>CONTRACTORS MONTHLY REPORTS</b></p> <ul style="list-style-type: none"> <li>In case contractors are hired to undertake the works planned as part of the Project activities or sub-activities, the Recipient, through the UGPE, will require such contractors to submit monthly monitoring reports to the UGPE regarding the ESHS performance of the contracted works.</li> <li>The Recipient will submit such monthly reports to the Association upon request. Any reports by contractors to the Recipient (via the UGPE) regarding individual SEA/SH incidents must follow the above guidance (see Part B). Any reports on the functioning of the contractors' GM, if applicable, should report data on SEA/SH incidents in aggregate form only (type of GBV and age/sex of the survivor).</li> </ul>	<ul style="list-style-type: none"> <li>Contractors' monthly reports to UGPE throughout their Contracts.</li> <li>UGPE submits the monthly monitoring reports to the Association whenever requested.</li> </ul>	<p>Contractors</p> <p>MoF/ UGPE</p>
<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 and Social Security (MHSS) has set up a PIU (the UGPE) for the Parent Project (PP) with qualified staff and resources to support management of ESHS risks and impacts of the Project, including an environmental and social specialist (E&amp;S). The E&amp;S will be responsible to manage and supervise the environmental and social risks and impacts of the Project as well.</p>	<p>The environmental and social specialist is already assigned to the Parent Project and she/he will be maintained throughout Project implementation.</p>	<p>UGPE</p>

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1.2	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS</b></p> <p>a. Assess the environmental and social risks and impacts of the proposed Project’s activities in accordance with the ESSs; the Environmental, Health and Safety Guidelines (EHSGs); the Parent Project’s (PP) ESMF (including the LMP), SEP and GBV/SEA/SH Action Plan (GBV AP); and other relevant Good International Industry Practice (GIIP), including relevant WHO guidelines.</p> <p>b. Update, consult, disclose, and adopt the PP’s ESMF, SEP, LMP and GBV/SEA/SH Action Plan (GBV AP).</p> <p>c. Prepare, consult, disclose, and adopt any environmental and social management plans, e.g. Medical Waste Management Plans (MWMPs), instruments or other measures required for the respective Project activities based on the assessment process, in accordance with the ESSs, the ESMF, the EHSGs, and other relevant Good International Industry Practice (GIIP), including relevant WHO guidelines to, <i>inter alia</i>, ensure access to and allocation of Project benefits 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 COVID-19 Vaccines.</p> <p>d. Incorporate the relevant aspects of this ESCP, including, <i>inter alia</i>, the ESMF, any environmental and social management plans, MWMPs and/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>e. 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 Bank, as set out in the ESMF.</p>	<p>a. Assessment was conducted before the carrying out of the relevant Project activities.</p> <p>b. The ESMF (including the LMP and GBV AP and other relevant Good International Industry Practice – GIIP and relevant WHO guidelines) shall be updated, and disclosed by Approval and implemented throughout Project implementation. The SEP will be updated by Appraisal.</p> <p>c. Plans/instruments shall be prepared, disclosed, consulted, and adopted before the carrying out of the relevant Project’s activities, and thereafter implemented throughout the carrying out of such activities.</p> <p>d. The relevant ESHS measures shall be incorporated into the procurement documents before launching the procurement process for the relevant Project’s activities and shall thereafter complied with throughout the carrying out of such activities.</p> <p>e. Before the carrying out of the relevant Project’s activities, and thereafter implemented throughout the carrying out of such activities.</p>	UGPE

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1.3	<p><b>EXCLUSIONS:</b></p> <p>Exclude the following type of activities as ineligible for financing under the Project:</p> <ul style="list-style-type: none"> <li>• Activities that may cause long term, permanent and/or irreversible adverse impacts (such as loss of major natural habitat);</li> <li>• Activities that have high probability of causing serious adverse effects to human health and/or the environment;</li> <li>• Activities that may have significant adverse social impacts and may give rise to significant social conflict;</li> <li>• Activities that may affect lands or rights of any vulnerable communities,</li> <li>• Activities that may involve permanent involuntary resettlement, including physical and/or economical displacement, and/or land acquisition, and/or adverse impacts on cultural heritage; and</li> <li>• All other excluded activities set out in the ESMF of the Project.</li> </ul>	<p>These exclusions shall be applied as part of the assessment process conducted under action 1.2.a. above.</p>	<p>UGPE</p>
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT:</b></p> <ul style="list-style-type: none"> <li>• The Project shall be carried out in accordance with the applicable requirements of ESS2, in a manner acceptable to the Association, including through, <i>inter alia</i>, implementing adequate occupational health and safety measures (including emergency preparedness and response measures), setting out grievance mechanisms (GM) for Project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.</li> <li>• Update, disclose, adopt, and implement the Parent Project (PP) Labor Management Procedures (LMP) in a manner acceptable to the Association.</li> </ul>	<ul style="list-style-type: none"> <li>• The Project shall be carried out in accordance with the applicable requirements of ESS2 throughout Project implementation.</li> <li>• The PP's LMP shall be updated and disclosed by Approval. The LMP shall be implemented throughout Project implementation.</li> <li>• The GM for Project workers shall be operational by the Effective Date and prior to engaging Project workers and start of any activities. GM maintained throughout Project implementation.</li> </ul>	<p>UGPE</p>
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	<p>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 including relevant WHO guidelines; and adequately manage and dispose of health care wastes (including, vaccines) and other types of hazardous and non-hazardous wastes.</p>	<ul style="list-style-type: none"> <li>Plans/instruments shall be prepared, disclosed, consulted and adopted before the carrying out of the relevant Project's activities, and thereafter implemented throughout the carrying out of such activities.</li> <li>The relevant ESHS measures shall be incorporated into the procurement documents before launching the procurement process for the relevant Project's activities and shall thereafter complied with throughout the carrying out of such activities.</li> </ul>	UGPE
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>COMMUNITY HEALTH AND SAFETY:</b></p> <ul style="list-style-type: none"> <li>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, and sexual harassment.</li> <li>GBV/SEA/SH mitigation measures shall be implemented to address identified SEA/SH risks per the GBV AP/s. The Recipient shall recruit GBV services providers to facilitate access to timely, safe, and confidential services for survivors (including providing funding for transportation, documentation fees, and lodging if needed).</li> <li>National COVID-19 Immunization Plan will include measures and/or policies to ensure voluntary consent for vaccination and prohibit forced vaccination.</li> </ul>	<ul style="list-style-type: none"> <li>All measures shall be included in the ESMF and adopted before the commencement of any Project activities and shall remain operational throughout Project implementation.</li> </ul>	UGPE

<p>4.2</p>	<p><b>USE OF SECURITY PERSONNEL:</b></p> <p>In case security personnel will be used in the implementation of Project activities, the following measures shall be adopted, to ensure the engagement of security forces is carried out in accordance with the ESSs:</p> <ol style="list-style-type: none"> <li>a. Assess the risks and impacts of engagement of the security personnel, as part of the assessment referred to in action 1.2 a) above, and implement measures to manage such risks and impacts, 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;</li> <li>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 (SEA), sexual harassment (SH) or excessive use of force;</li> <li>c. Ensure that MHSS enters into a memorandum of understanding (MoU), with the line ministry in control of military or security forces and relevant Security or Military Unit, setting out the arrangements for the engagement of the security personnel under the Project, including compliance with the relevant requirements of this ESCP;</li> <li>d. Ensure that the security personnel is adequately instructed and trained, prior to development and on a regular basis, on the use of force and appropriate conduct (including in relation to civilian-security engagement, SEA and SH, and other relevant areas), as set out in the Environmental and Social Management Framework;</li> <li>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;</li> <li>f. Ensure that any concerns or grievances regarding the conduct of security personnel are received, monitored, documented (taking into account the need to protect confidentiality), resolved through the Project's grievance mechanism and reported to the Bank no later than 14 days after being received;</li> <li>g. Where the Association shall require, after consultation with the Borrower: (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</li> </ol>	<ol style="list-style-type: none"> <li>a) Assessment carried out in the same timeframe than action 1.2 a) above and any required measures shall be adopted before deploying security personnel under the Project and thereafter implemented throughout Project implementation or a stand-alone Security Management Plan shall be prepared and adopted before deploying security personnel under the Project and thereafter implemented throughout Project implementation.</li> <li>b), c) and d) before deploying security personnel under the Project and thereafter throughout Project implementation.</li> <li>e) and f) as set out under actions 10.1 and 10.2 respectively.</li> <li>g) within the timeframes requested by the Association.</li> </ol>	<p>MHSS/UGPE/Ministry in control of military or security forces/Relevant Security or Military Unit</p>
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MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	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.		
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	Not currently relevant. No land acquisition, restrictions on land use or involuntary resettlement in the proposed project. Small rehabilitation works of existing health facilities will be conducted within existing government facilities/grounds and no new land will be acquired or accessed.		
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	Infectious Medical Waste could affect natural resources, if handled and disposed of inappropriately. All personnel involved in the project must following the requirements delineated in the ESMF and the stand-alone Medical Waste Management Plan to ensure safe handling and disposal of medical and hazardous waste, outlined in ESS1 and ESS3.	<ul style="list-style-type: none"> <li>Plans/instruments shall be prepared, disclosed, consulted and adopted before the carrying out of the relevant Project's activities, and thereafter implemented throughout the carrying out of such activities.</li> <li>The relevant ESHS measures shall be incorporated into the procurement documents before launching the procurement process for the relevant Project's activities and shall thereafter complied with throughout the carrying out of such activities.</li> </ul>	UGPE
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
	Not relevant, as there are no IP/SSAHUTLCs in Cabo Verde.		
<b>ESS 8: CULTURAL HERITAGE</b>			
	Not currently relevant.		
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
	Not relevant.		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN:</b> Update, consult, disclose, and adopt the PP's Stakeholder Engagement Plan (SEP) consistent with ESS10, which shall include measures to, <i>inter alia</i> , 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.	The PP's SEP shall be updated, disclosed and adopted by Appraisal. The SEP shall be implemented throughout Project implementation.	UGPE

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
10.2	<p><b>GRIEVANCE MECHANISM:</b></p> <ul style="list-style-type: none"> <li>• Ensure that the PP’s grievance mechanism (GM) is maintained, equipped and strengthened to continue receiving and facilitating 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.</li> <li>• The PP’s grievance mechanism shall also include GBV/SEA/SH-sensitive grievance arrangements to receive, register and address concerns and grievances 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.</li> </ul>	<p>The grievance arrangements of the PP shall be equipped and adapted to address GBV/SEA/SH-allegations before the commencement of any Project activities. The GM shall remain operational throughout Project implementation.</p>	UGPE
<b>CAPACITY SUPPORT (TRAINING)</b>			
CS1	<p>Project Management 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, and the roles and responsibilities of different key agencies in the ESF implementation.</p>	<p>No later than 45 days of the Effective Date and periodically with the addition of new Project team members join the Project throughout implementation.</p>	UGPE
	<p>Training topics for personnel involved in Project implementation will include, among others:</p> <ul style="list-style-type: none"> <li>• COVID-19 Infection Prevention and Control Recommendations;</li> <li>• Laboratory biosafety guidance related to COVID-19;</li> <li>• Specimen collection and shipment;</li> <li>• Standard precautions for COVID-19 patients;</li> <li>• Risk communication and community engagement;</li> <li>• Risks of GBV/SEA/SH;</li> <li>• GM functioning, including management and supervision of alleged GBV/SEA/SH-sensitive cases; and</li> <li>• WHO and Africa CDC guidelines on quarantine including case management.</li> </ul>	<p>Throughout Project implementation.</p>	UGPE