

**Republic of El Salvador  
Ministry of Health (MoH)**

**El Salvador COVID-19 Response  
Project (P173872)  
and  
Additional Financing 1  
(P176033)  
and  
Additional Financing 2  
(P178315)**

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

**March 31, 2022**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of El Salvador (hereinafter the Borrower), through the Ministry of Health (MoH), is implementing the El Salvador COVID-19 Emergency Response Project (the Parent Project), is implementing the activities under the first Additional Financing (first AF or AF1) and will implement activities to be supported under the second Additional Finance (the Project, the second AF or AF2). The International Bank for Reconstruction and Development (hereinafter the Bank) has agreed to provide financing for the Project. This ESCP supersedes previous versions of the ESCP for the Project and the first Additional Finance and shall apply to the original (P173872), the first AF (P176033) and second AF (P178315) for the Project referred to above.
2. The Borrower, through the MoH, 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 Borrower, 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 Bank.
3. The Borrower is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by MoH.
4. Implementation of the material measures and actions set out in this ESCP shall be monitored and reported to the Bank by the Borrower as required by the ESCP and the conditions of the Loan Agreements.
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 shall agree to the changes with the Bank and shall update the ESCP to reflect such changes. Agreement on changes to the ESCP shall be documented through the exchange of letters signed between the Bank and minister in charge of MoH on behalf of the Borrower. MoH shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>MONITORING AND REPORTING</b>			
A	<b>REGULAR REPORTING:</b> 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, medical waste management, occupational health and safety, stakeholder engagement activities and grievances logs. Monitoring reports shall include progress on the implementation of the ESCP.	Every six-months during the Project's implementation in conjunction with the Project Reports, starting from the Effective Date. Submit each report to the Bank no later than 30 days after the end of each reporting period.	Project Coordination Unit (PMU) of the Ministry of Health (MoH)
B	<b>INCIDENTS AND ACCIDENTS:</b> Promptly notify the Bank 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 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 Bank's request, prepare a report on the incident or accident and propose any measures to prevent its recurrence.	Notify the Bank within 48 hours after learning of the incident or accident. A report would be provided within a timeframe acceptable to the Bank, as requested.	MoH
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<b>ORGANIZATIONAL STRUCTURE:</b> MoH shall establish and maintain a Project Coordination Unit (PMU) with qualified staff and resources to support management of ESHS risks and impacts of the Project, including environmental and social specialists with qualifications and experience acceptable to the Bank.	Ensure the environmental and social specialists hired for the project are maintained throughout Project implementation.	MoH

<p>1.2</p>	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT/MANAGEMENT PLANS AND INSTRUMENTS/ CONTRACTORS</b></p> <p>a. Assess the environmental and social risks and impacts of proposed Project activities in accordance with the Environmental and Social Management Framework (ESMF), \ updated, disclosed and adopted for the Project, the ESSs, the Environmental, Health and Safety Guidelines (EHSs), and other relevant Good International Industry Practice (GIIP), including relevant WHO guidelines. The updated ESMF shall include an Infection Control and Waste Management Plan (ICWMP), a Medical Waste Management Plan (MWMP), and an Emergency Preparedness and Response Plan (ERP) for the vaccination activities.</p> <p>b. Prepare, disclose, adopt, and implement any environmental and social management plans (ESMPs), instruments or other measures required for the respective Project activities based on the assessment process, in accordance with the ESSs, the ESMF, the EHSs, and other relevant Good International Industry Practice (GIIP) including relevant WHO Guidelines on COVID-19 response to, inter alia, 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 vaccines.</p> <p>c. 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 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 (as applicable) 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 where beneficiaries give informed consent to receive a vaccine, and is acceptable to the Bank, as set out in the ESMF.</p> <p>e. Ensure that any activity financed retroactively complies with the updated ESMF and LMP, as relevant and the ESSs. An E&amp;S Audit Addendum shall be carried out in respect of any retroactive financing of vaccine purchases as a disbursement condition. An E&amp;S Assessment shall be completed and found</p>	<p>a. Throughout Project implementation.</p> <p>b. Plans/instruments shall be prepared, disclosed, consulted and adopted before the carrying out of the relevant Project activities, and thereafter implemented throughout the carrying out of such activities.</p> <p>c. Before launching the procurement process for the relevant Project activities, and thereafter throughout the carrying out of such activities.</p> <p>d. Before the carrying out of the relevant Project activities, and thereafter implemented throughout the carrying out of such activities.</p> <p>e. The E&amp;S Audit Addendum shall be completed within a timeframe acceptable to the Bank, and shall be approved by the Bank, prior to disbursement of funds.</p> <p>The E&amp;S Assessment in respect of non-vaccine related purchases shall be completed and found satisfactory to the Bank prior to authorization for disbursement of funds against retroactively financed activities and expenditures.</p> <p>Measures in accordance with the Action Plan will be implemented throughout the project.</p> <p>f. Throughout project implementation and before carrying out such</p>	<p>MoH</p>
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MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>satisfactory to the Bank prior to authorization for disbursement of expenditure for retroactively financed activities. The TORs of the E&amp;S Audit Addendum as well as the TORs for the E&amp;S Assessment shall be subject to the Bank's prior approval. The Borrower shall implement the actions within the timeframes specified in the applicable Action Plans.</p> <p>f. Ensure that adequate measures are in place to monitor, investigate and respond to adverse events following immunization for Project beneficiaries, assessing the current capacity to ensure that follow-up monitoring actions are in place during implementation.</p>	<p>activities.</p>	
<p>1.3 <b>EXCLUSIONS:</b> Exclude the following types 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 (e.g. loss of major natural habitat) adverse impacts</li> <li>• Activities that have high probability of causing serious adverse effects to human health and/or the environment not related to treatment of COVID-19 cases</li> <li>• Activities that may have significant adverse social impacts and may give rise to significant social conflict</li> <li>• Activities that may involve resettlement or land acquisition/land use restriction or adverse impacts on cultural heritage</li> <li>• All the other excluded activities set out in the ESMF of the Project.</li> </ul>	<p>During the assessment process conducted under action 1.2.a. above.</p>	<p>MoH</p>
<p>1.4 The Borrower shall ensure that resources, including human and financial resources, are available to cover the incremental costs associated with the management of increased waste volumes, including biomedical waste and vaccination related waste (expired and opened vaccine vials), resulting from Project activities.</p>	<p>Throughout Project implementation</p>	<p>MOH</p>
<p><b>ESS 2: LABOR AND WORKING CONDITIONS</b></p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	<b>LABOR MANAGEMENT:</b> 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, implementing adequate occupational health and safety measures (including emergency preparedness and response measures), setting out a grievance mechanism specific for Project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. The Borrower shall continue to adopt and implement Labor Management Procedures (LMP) reflecting the above requirements. The Borrower shall also implement relevant actions as per the applicable E&S Audit Action Plan.	. All measures specified in this action 2.1 to be implemented throughout Project implementation.	MoH
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
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 ESHGs, and other relevant GIPP including relevant WHO guidelines; and adequately manage and dispose of health care wastes (including, vaccines) and other types of hazardous and non-hazardous wastes.	Throughout Project implementation.	MoH
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>COMMUNITY HEALTH AND SAFETY:</b> 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; 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. Prepare and respond to emergencies as per the guidance included in the ESMF as applicable.	Throughout Project implementation.	MoH
4.2	<b>USE OF SECURITY FORCES:</b> In case the Borrower's Security Forces are used in the implementation of Project activities for provision of security to Project workers, sites and/or assets, MOH shall, in coordination with other competent authorities, as relevant, implement the following measures:	a) Throughout Project implementation.  b) and c) before deploying security or military personnel under the Project and thereafter throughout Project implementation.  d) and e) as set out under actions 10.1 and 10.2 respectively.	MoH

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<ul style="list-style-type: none"> <li>a. Assess the risks and impacts of engagement of the Security Forces, 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 forces;</li> <li>b. Adopt and enforce standards, protocols and codes of conduct, in coordination with other competent authorities, for the selection and use of such forces, 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 such forces is adequately instructed and trained, prior to deployment and on a regular basis, on the use of force and appropriate conduct (including in its relations to civilian, SEA and SH, and other relevant areas), as set out in the ESMF;</li> <li>d. Ensure that the stakeholder engagement activities under the Stakeholder Engagement Plan (SEP) include a communication strategy on the involvement of such forces under the Project;</li> <li>e. Ensure that any concerns or grievances regarding the conduct of such forces are received, monitored, documented (taking into account the need to protect confidentiality), resolved through the Project's grievance mechanism (see action 10.2 below) and reported to the Bank no later than 5 days after being received.</li> </ul>		
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>		
	Not currently relevant. Should any proposed Project activities involve any land acquisition, restrictions on land use or involuntary resettlement, relevant aspects of this standard shall be considered under action 1.2 above.	
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>		
	Not currently relevant	
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
7.1	<p><b>MEASURES FOR INDIGENOUS PEOPLES:</b> 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 an fair, equitable, inclusive and culturally appropriate manner, particularly with regards to information and access to vaccines, with elements of an IPPF incorporated into 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.</p>	Throughout Project implementation.	MoH
<b>ESS 8: CULTURAL HERITAGE</b>			
Relevant aspects of this standard shall be considered, as needed, under action 1.2 above.			
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
Not currently relevant.			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN:</b> Update the current SEP, disclose, and adopt in consistency 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>	A draft updated SEP will be prepared and disclosed before Appraisal. The updated SEP shall be implemented throughout Project implementation.	MoH
10.2	<p><b>GRIEVANCE MECHANISM:</b> An accessible grievance mechanism has been established and will continue its operation 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 sexual exploitation and abuse and 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.</p>	Throughout Project implementation.	MoH
<b>CAPACITY SUPPORT (TRAINING)</b>			



MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>A. <b>TRAINING:</b> 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. Project workers to receive training on the contents and requirements detailed in the ESMF, the Infection Control and Waste Management Plan and Emergency Preparedness and Response Plan to ensure compliance with environmental and social requirements. If needed, security forces shall be trained on the applicable standards and code of conduct in line with the guidance provided in the WB’s Technical Note “Use of Military Forces to Assist in Covid-19 Operations” and as defined in the updated ESMF. The Borrower shall ensure that resources, including human and financial resources, are available to cover costs associated with such training requirements.</p>	<p>Throughout Project implementation.</p>	<p>MoH</p>

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