

Republic of Iraq

Iraq COVID-19 Vaccination Project

P177038

ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

August 2021

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Iraq (hereinafter the **Borrower**) shall implement the **Iraq COVID-19 Vaccination Project** (the **Project**), through the Ministry of Health and Environment (MOHE). The International Bank for Reconstruction and Development (hereinafter the **Bank**) has agreed to provide financing for the Project.
2. The Borrower 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. 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 provisions of the Loan Agreement.
4. 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 *or delegate(s)* 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 Bank and the Borrower *or delegate(s)*. The Borrower *or delegate(s)* 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 Borrower 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	REGULAR REPORTING: 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, stakeholder engagement activities and grievances log.	Starting from the Effective Date, quarterly reports, shall be submitted no later than 20 days after the end of each reporting period, throughout Project implementation.	Project Management Unit (PMU)- Environment and Social Specialists at MOHE
B	INCIDENTS AND ACCIDENTS: 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, <i>including, inter alia, any COVID outbreak in the Project area</i> , and sexual exploitation and abuse and sexual harassment (SEA/SH). 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 shall be provided within a timeframe acceptable to the Bank, as requested. This notification/reporting system shall remain in place throughout Project implementation.	PMU- Environment and Social Specialists at MOHE
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.1 ORGANIZATIONAL STRUCTURE: The MOHE shall maintain the PMU with qualified staff and resources to support management of ESHS risks and impacts of the Project throughout the implementation of the Project, including three Environmental Specialists, three Social Specialists, a Communication Specialist, and a dedicated Grievance Mechanism Officer to closely monitor the implementation of the environmental and social mitigation measures, all with qualifications and experience acceptable to the Bank.</p> <p>Third-party monitoring agency (TPMA) shall be contracted by the MOHE and shall be responsible for monitoring compliance of the vaccination efforts with Iraq's National COVID-19 Deployment and Vaccination Plan (NDVP) and WHO standards, as well as Bank requirements on technical, environmental, and social issues in accordance with ESSs. A detailed terms of reference (TOR) has been prepared defining the specific roles and responsibilities of the TPMA. The TOR shall be subject to Bank approval. The TPMA role can be filled by a United Nations (UN) agency (or agencies), international or local non-governmental organizations (NGO), or consulting firms that meet the criteria agreed upon between the Bank and MOHE.</p>	<p>Two environmental, two social specialists, one communication specialist and one GM officer have already been appointed and shall be maintained throughout Project implementation.</p> <p>Prior to the start of the activities and shall be maintained throughout Project implementation. TPMA to be contracted before the Effective Date.</p>	<p>PMU at MOHE</p> <p>PMU at MOHE</p>

1.2	<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 <i>Environmental and Social Management Framework (ESMF)</i> to be prepared, disclosed, consulted and adopted for the Project, in line with the ESSs, the Environmental, Health and Safety Guidelines (EHSs), and other relevant Good International Industry Practice (GIIP), including relevant World Health Organization (WHO) guidelines and the relevant national or international instruments ratified by Iraq such as Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal.</p> <p>b. Prepare, disclose, consult, adopt and implement relevant environmental and social management instruments (e.g. of Infection Control and Waste Management Plan (ICWMP), Stakeholder Engagement Plan, Labor Management Procedures, SEA/SH Prevention and Response Action Plan, etc.), or other measures required for the respective Project activities based on the assessment process, in accordance with the ESSs, the ESMF, the EHSs, GIIP, including relevant WHO guidelines and the relevant national or international instruments applicable 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, 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.</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 Bank, as set out in the ESMF.</p> <p>e. Ensure that vaccines purchased under the Project are deployed only after the ESMF is disclosed and adopted, including the vaccines that are subject to</p>	<p>a. ESMF shall be prepared, disclosed, consulted and adopted before the negotiation and shall be used for screening of relevant Project activities, identification of site specific instruments and for overall guidance for the implementation of environmental and social aspects of the Project which shall be applicable throughout the Project implementation. Any updates or changes to the approved ESMF shall be agreed with the Bank prior to its adoption.</p> <p>b. ICWMP and LMP Plans/instruments shall be prepared as part of ESMF, disclosed, consulted and adopted before the negotiation, 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 and shall thereafter complied with 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. Deployment of vaccines purchased</p>	<p>PMU - Environment and Social Specialists at MOHE</p>
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	retroactive financing	under the Project (including those retroactively financed) shall occur after the disclosure and adoption of the ESMF. Such deployment shall be carried out in accordance with the ESMF.	
1.3	<p>EXCLUSIONS: Exclude the following types of activities as ineligible for financing under the Project:</p> <ul style="list-style-type: none"> Any activities that cause significant and irreversible environmental and social damage Activities that involve forced or child labor. All the other excluded activities set out in the ESMF of the Project. 	During the screening and assessment process conducted under action 1.2.a. above.	PMU - Environment and Social Specialists at MOHE.
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT: 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 provisioning and use of personal protective equipment, and 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.</p> <p>Prepare, disclose, consult, adopt and implement Labor Management Procedures (LMP) as part of the ESMF, in accordance with the requirements of ESS2.</p>	An LMP shall be prepared, disclosed, consulted and adopted before the negotiation as part of the ESMF and shall be implemented throughout the Project implementation.	PMU - Environment and Social Specialists at MOHE.

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2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>As part of the LMP, establish, maintain, and operate a GM for Project workers, as described in the LMP, consistent with ESS2 and ESS10, and in a manner acceptable to the Bank. The GM shall have the following characteristics, as a minimum:</p> <ul style="list-style-type: none"> – Proportionate to the nature and scale of the Project and its risks and impacts. – Addresses concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned in a language that they understand, and without any retribution. – Operates in an independent and objective manner. – Existing GMs shall be utilized as needed given they possess the above characteristics in accordance with ESS2 and ESS10, in a manner acceptable to the Bank. Existing arrangements shall be supplemented with Project specific arrangements as needed. 	<p>Grievance mechanism shall be operational prior to engaging Project workers and maintained throughout Project implementation.</p> <p>Report on Project workers' GM implementation activities as part of regular reports as required in Section A of this ESCP.</p>	PMU- Environment and Social Specialists at MOHE.
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
	<p>Prepare, disclose, consult, adopt and implement an Infection Control and Waste Management Plan (ICWMP) as part of the ESMF, in accordance with ESS3 and in a manner acceptable to the Bank.</p> <p>Relevant aspects of this standard shall be considered, as needed, under action 1.2 above, including, inter alia, measures, as reflected in the Infection Control and Waste Management Plan ICWMP, to: carry out the purchase, storage, transportation and handling of vaccines (including, cold chain management) in a safe manner and in accordance with the EHSs, 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>	ICWMP shall be prepared as part of the ESMF, disclosed, consulted, adopted before the negotiation and implemented throughout the Project implementation.	PMU - Environment and Social Specialists at MOHE.
ESS 4: COMMUNITY HEALTH AND SAFETY			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>4.1 COMMUNITY HEALTH AND SAFETY:</p> <p>(a) 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; prevent sexual exploitation and abuse, and sexual harassment; 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; and manage the potential social risks related to the use of military personnel.</p> <p>(b) Prepare, disclose, consult, adopt, and implement an SEA/SH Prevention and Response Action Plan (including a mapping of existing service providers) to be annexed to the ESMF, in accordance with ESS4 and in a manner acceptable to the Bank.</p> <p>(c) Provide workers engaged in the project with SEA/SH trainings and have code of conduct signed.</p> <p>(d) The communities living in the vicinity of health facilities that will be supported by the Project shall also be made aware of the GM that can be utilized to raise concerns or complaints regarding the conduct of PMU staff and other workers engaged in the project. Any cases related to SEA/SH shall be handled through a separate GM channel.</p>	<p>(a) Potential risks and impacts and relevant mitigation measures to be identified as part of the ESMF and adopted and implemented throughout Project implementation.</p> <p>(b) SEA/SH Prevention and Response Action Plan as part of the ESMF shall be prepared, disclosed, consulted, and adopted before the negotiation and implemented throughout Project implementation.</p> <p>(c) Throughout the Project implementation</p> <p>(d) Throughout the Project implementation</p>	<p>PMU - Environment and Social Specialists at MOHE.</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
4.2.	<p>USE OF SECURITY AND MILITARY PERSONNEL: The security forces will be engaged to accompany the cold trucks to secure transportation of the vaccine shipments from the airport to the place of destination and will be present outside vaccination sites to provide protection. The security forces accompanying the cold trucks will be members of the Iraqi army, reporting to the Joint Operations Command through the Ministry of Defense. Security forces for facility protection shall report to the Facilities Protection Directorate of the Ministry of Interior.</p> <p>The following measures shall be adopted and 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 forces and implement measures to manage such risks and impacts, as set out in the ESMF, guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of security forces. b. Ensure that the stakeholder engagement activities under the Stakeholder Engagement Plan (SEP) include a communication strategy on the involvement of military and any other security personnel under the Project; c. Ensure that any concerns or grievances regarding the conduct of security 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 as required under the rules of conduct, and reported to the Bank no later than 3 days after being received. 	<p>a) Assessment carried out in the same timeframe as action 1.2 a) above. ESMF shall be prepared by the negotiation and implemented throughout the Project implementation.</p> <p>b) and c) as set out under actions 10.1 and 10.2 respectively.</p>	PMU - Environment and Social Specialists at MOHE.
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
	Not relevant		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
	Not relevant		
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	Not relevant		
ESS 8: CULTURAL HERITAGE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
	Not relevant		
ESS 9: FINANCIAL INTERMEDIARIES			
	Not relevant		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN: Prepare, 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.	SEP to be prepared, consulted upon, disclosed and adopted prior to Appraisal. The SEP shall be implemented and updated if necessary in agreement with the Bank, throughout Project implementation.	PMU - Environment and Social Specialists at MOHE.
10.2	<p>GRIEVANCE MECHANISM: Grievance mechanism for the Project was already established. The Project GM shall be 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 the, 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.</p>	Implement, maintain and operate the existing GM throughout Project implementation.	PMU - Environment and Social Specialists at MOHE.
CAPACITY SUPPORT (TRAINING)			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>CS1 PMU staff will be trained on specific aspects of environmental & social risk management, stakeholder engagement, occupational health & safety (OHS), fair, equitable and inclusive access and allocation of Project benefits including with regards to vaccines.</p> <p>The trainings shall be organized observing the COVID-19 preventive measures as recommended by the MOHE, the guidance by WHO and any other good international practices.</p> <p>Ensure that all Project workers are adequately instructed and trained, on a regular basis, on prevention and reporting procedures available for SEA/SH as set out in ESMF and SEP.</p>	<p>ESS-related training shall be delivered to relevant staff as required, including front-line implementers not later 30 days of the Effective Date and periodically with the addition of new Project team members join the Project throughout implementation.</p>	<p>The PMU will hire relevant experts to conduct the training as part of the project. Responsibility for ensuring that the necessary training is provided lies with the PMU at MOHE.</p> <p>Reporting will be the responsibility of Environment and Social Specialists at MOHE.</p>