REPUBLIC OF EL SALVADOR

Ministry of Health
GROWING UP HEALTHY TOGETHER:
COMPREHENSIVE EARLY CHILDHOOD
DEVELOPMENT IN EL SALVADOR PROJECT

Negotiated version
ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)

February 10, 2020
ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of El Salvador will implement the Growing Up Healthy Together: Comprehensive Early Childhood Development in El Salvador Project (the Project,) with the involvement of its Ministry of Health (Ministerio de Salud - MINSAL). The International Bank for Reconstruction and Development (hereinafter the Bank) has agreed to provide financing for the Project.

2. The Republic of El Salvador will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (ESSs). This Environmental and Social Commitment Plan (ESCP) sets out material measures and actions, specific documents or plans, as well as the timing for each of these.

3. The Republic of El Salvador will implement material measures and actions so that the Project is implemented in accordance with the Environmental and Social Standards (ESSs) and mentioned in this ESCP, such as the Environmental and Social Management Framework (ESMF), the Environmental and Social Management Plans (ESMPs) for subprojects, the Stakeholder Engagement Plan (SEP), the Indigenous Peoples Planning Framework (IPPF), specific Indigenous Peoples Plans (IPPs) that will be developed for sub-projects, and the Labor Management Procedures (LMP) and the timelines specified in those E&S documents. These documents may be reviewed from time to time, with prior written agreement of the Bank.

4. The Republic of El Salvador is responsible for compliance with all requirements of the ESCP even when implementation of specific measures and actions is conducted by the Ministry, agency or unit referenced in 1. above.

5. Implementation of the material measures and actions set out in this ESCP will be monitored and reported to the Bank by the Republic of El Salvador as required by the ESCP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the material measures and actions throughout implementation of the Project.

6. As agreed by the Bank and the Republic of El Salvador, 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 Republic of El Salvador, through the Minister in charge of MINSAL, will agree to the changes with the Bank 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 Bank and MINSAL. MINSAL 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 Republic of El Salvador shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts.
<table>
<thead>
<tr>
<th>MATERIAL MEASURES AND ACTIONS</th>
<th>TIMEFRAME</th>
<th>RESPONSIBLE ENTITY/AUTHORITY</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>MONITORING AND REPORTING</strong></td>
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<td>A <strong>REGULAR REPORTING</strong></td>
<td>Submit to the Bank bi-annual monitoring reports during Project implementation. The first report must be presented 6 months after the Project’s Effective Date.</td>
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<td>Regularly 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 the implementation of the ESCP, status of preparation and implementation of E&amp;S documents required under the ESCP, stakeholder engagement activities and the functioning of the grievance mechanism(s). The Project Operations Manual (POM) shall contain an annex of the minimum content and format of the reports, also indicating frequency and procedures.</td>
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<td>B <strong>INCIDENTS AND ACCIDENTS</strong></td>
<td>Notify the Bank of any incident or accident within 48 hours after becoming aware of the incident or accident, followed by a detailed report on the incident within the timeframe established by the Bank following the initial notification.</td>
<td>MINSAL</td>
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<td>Incidents and accidents 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 accidents that result in death, serious or multiple injury. Provide enough detail regarding the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, information from 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. The Operations Manual shall set out the process to notify incidents or accidents including the content format of the detailed reports.</td>
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<td>C <strong>CONTRACTORS MONTHLY REPORTS</strong></td>
<td>Monthly reports throughout Project implementation.</td>
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<td>Contractors to provide monthly monitoring reports on environmental, social, health and safety aspects to MINSAL. Such monthly reports shall be submitted by MINSAL to the Bank.</td>
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**ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS**
### MATERIAL MEASURES AND ACTIONS

<table>
<thead>
<tr>
<th>1.1</th>
<th>ORGANIZATIONAL STRUCTURE</th>
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<tbody>
<tr>
<td>a)</td>
<td>MINSAL will establish and maintain a Project Coordination Unit (PCU) with qualified and experienced staff and resources to support the management of E&amp;S risks including occupational and community health and safety risks of the Project, in a manner acceptable to the Bank. This will include, at a minimum: one environmental specialist and one social specialist.</td>
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<td>b)</td>
<td>MINSAL will require the consulting firms for the design and supervision to have adequate experience in E&amp;S management in order to carry out pre-feasibility, feasibility, planning and management of subprojects, including mitigation measures in bidding documents, and to supervise their implementation during construction.</td>
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### TIMEFRAME

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<thead>
<tr>
<th>1.1</th>
<th>a) The environmental specialist and the social specialist will be hired no later than 90 days after the Project Effective Date.</th>
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<td>The PCU will have a full staff and will remain operational throughout Project implementation.</td>
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<td>b) MINSAL will introduce the ESHS requirements for consulting firms into the applicable bidding documents and contracts, and thereafter ensure compliance with these requirements throughout Project implementation.</td>
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### RESPONSIBLE ENTITY/AUTHORITY

MINSAL
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<tr>
<th>MATERIAL MEASURES AND ACTIONS</th>
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<tr>
<td><strong>1.2 ENVIRONMENTAL AND SOCIAL ASSESSMENT AND FRAMEWORK</strong>&lt;br&gt;Finalize, adopt, disclose and implement an Environmental and Social Management Framework (ESMF), which shall include an Environmental and Social Assessment (ESA) for the Project, in a manner acceptable to the Bank. The revised version of the ESMF will determine the environmental, social requirements, and those related to occupational health and safety for the subprojects and other Project activities, including the following generic plans:</td>
<td>The ESMF/ESA shall be adopted and disclosed, in a manner acceptable to the Bank no later than 30 days after the Project Effective Date. The ESMF will be implemented throughout Project implementation.</td>
<td>MINSAL</td>
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- Integrated solid waste management plan for common and hazardous waste (biomedical / hospital / laboratory), which includes measures for the management and disposal of asbestos and other hazardous materials which may be generated during the rehabilitation of existing facilities, including in the subproject construction and operation stages.
- Integrated wastewater management plan including in the subproject construction and operation stages.
- Occupational health and safety plan for Project activities, as well as for communities in the adjacent areas of influence of the project, including in the subproject construction and operation stages.
- Security personnel management plan
- Manual for temporary relocation of health centers
- Worker code of conduct
- Traffic management plan
- Cultural heritage management plan
- Chance finds procedures
- Participation and consultation plan
- Emergencies and contingencies plan
- Monitoring and supervision plan
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<thead>
<tr>
<th></th>
<th>ENVIRONMENTAL AND SOCIAL MANAGEMENT PLANS</th>
<th>MANAGEMENT OF CONTRACTORS</th>
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<td>1.3</td>
<td>Screen any proposed subproject and other Project activities in accordance with the ESMF prepared for the Project, and, thereafter, prepare, adopt, disclose and implement any Environmental and Social Management Plans (ESMP), as required, in a manner acceptable to the Bank.</td>
<td>Evaluate the capacity of contractors to comply with the requirements of the ESMF and the LMP.</td>
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<td>Any subproject or Project activities that would fall within the exclusion/eligibility criteria of the ESMF shall not be supported. The exclusion criteria in ESMF includes, <em>inter alia</em>, subprojects or Project activities that would involve permanent or temporary physical and economic displacement resulting from land acquisition or restrictions as specified under ESS5.</td>
<td>Incorporate the relevant aspects of the ESCP, including the relevant E&amp;S documents, ESMPs, and the Labor Management Procedures, into the environmental, social, occupational health and safety (ESHS) specifications of the bidding documents with contractors. Afterwards, ensure that contractors prepare the ESMPs specific to the sub-project (contractor ESMP), and other plans as necessary, and that they have the capacity to comply with the ESHS specifications in their contracts.</td>
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<td>The ESMPs will be prepared and submitted for the Bank's review and approval, and thereafter adopted and disclosed prior to launching the bidding process for the respective civil works and will be implemented throughout the execution of said works. The ESMPs will be included in the contracts.</td>
<td>Prior to the preparation of bidding documents. Supervise contractors throughout Project implementation.</td>
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<td>The ESMPs will be implemented throughout the execution of said works.</td>
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### 1.5 CONTINGENT EMERGENCY RESPONSE

**a)** Ensure that the Emergency Response Manual (“ERM”) incorporates the E&S management arrangements and requirements in a manner consistent with the ESSs, including the preparation of any required environmental and social instruments for the activities to be carried under the Contingent Emergency Response (Part 3) of the Project.

**b)** Prepare, adopt and disclose all the E&S instruments that may be required for activities under Part 3 of the Project in accordance with the ERM and the ESSs, and thereafter implement the measures and actions required under said instruments, within the timeframes specified in said instruments, all in manner acceptable to the Bank.

**a)** The adoption of the ERM in form, substance and manner acceptable to the Bank is a withdrawal condition under Section III.B.1(b)(iv) of Schedule 2 of the Legal Agreement for the Project

**b)** The E&S instruments will be submitted for the Bank’s review and approval, and thereafter adopted before the carrying out of any activity under Part 3 of the Project that requires the preparation of these instruments. Once adopted, these instruments will be implemented in accordance with their terms, in a manner acceptable to the Bank.

### ESS 2: LABOR AND WORKING CONDITIONS

#### 2.1 LABOR MANAGEMENT PROCEDURES

Develop and implement Labor Management Procedures (LMP), in a manner acceptable to the Bank.

The LMP shall be adopted, in a manner acceptable to the Bank, no later than 30 days after the Project Effective Date.

The LMP will be implemented throughout Project implementation.

#### 2.2 GRIEVANCE MECHANISM FOR PROJECT WORKERS

Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and in a manner consistent with ESS 2.

Grievance mechanism acceptable to the Bank operational within 60 days of the Project Effective Date and maintained throughout Project implementation.

#### 2.3 OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES

Develop and implement occupational, health and safety (OHS) measures, including measures on emergency preparedness and response, as part of the development and implementation of project activities and the ESMPs, in accordance with the guidelines contained in the ESMF and LMP.

Same timeframe as for the implementation of the LMP under action 2.1.

### ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT
### 3.1 MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS:
Integrated management measures for common and hazardous waste and wastewater will be developed and thereafter implemented, which will include training for contractors on how to manage waste and wastewater resulting from sub projects. These measures will be part of the ESMPs to be prepared in accordance with the ESMF.

**MINSAL**

| Same timeframes as for the development and implementation of the ESMPs, under action 1.3. |

### 3.2 RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT:
Resource efficiency and pollution prevention and management measures will be covered in the ESMF and in ESMPs as necessary.

**MINSAL**

| Same timeframes as for the development and implementation of the ESMPs, under action 1.3. |

### ESS 4: COMMUNITY HEALTH AND SAFETY

#### 4.1 TRAFFIC AND ROAD SAFETY:
Adopt and implement measures and actions to assess and manage traffic and road safety risks as required in the ESMPs to be developed in accordance with the guidelines contained in the ESMF.

**MINSAL**

| Same timeframes as for the development and implementation of the ESMPs, under action 1.3. |

#### 4.2 COMMUNITY HEALTH AND SAFETY:

- **a)** Prepare, adopt, and implement measures and actions to assess and manage specific risks and impacts to the community arising from Project activities including in relation to behavior of Project workers and any risks of labor influx, and include these measures in the ESMPs to be prepared in accordance with the ESMF, in a manner acceptable to the Bank.
- **b)** Site-specific Emergency Response and Preparedness Plans, which will include general emergency response and preparedness planning and training procedures, as well as operations-phase facility maintenance requirements will be developed. These plans will be part of the ESMPs to be prepared in accordance with the ESMF.

**MINSAL**

| a) and b) have the same timeframes as for the implementation of the ESMPs, under action 1.3. |

#### 4.3 SECURITY PERSONNEL:
Develop and implement measures and actions to assess and manage the risks to human security of project-affected communities and Project workers that could arise from the use of security personnel. These measures and actions will be part of the ESMPs to be prepared in accordance with the ESMF.

**MINSAL**

| Same timeframe as for the implementation of the ESMPs, under action 1.3. |

### ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT

ESS 5 is currently not relevant.

### ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES
## Risks and Impacts for Biodiversity

6.1 **RISKS AND IMPACTS FOR BIODIVERSITY:**
Develop and implement procedures for the identification at the subproject level to ensure that civil works financed by the Project do not take place on or adversely impact biodiversity and environmentally sensitive areas, particularly in natural or critical habitats. These procedures will be part of the ESMPs to be prepared in accordance with the ESMF.

   Same timeframe as for the implementation of the ESMPs, under action 1.3.

   **MINSAL**

### ESS 7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

7.1 **INDIGENOUS PEOPLES PLANNING FRAMEWORK:** Update, adopt and implement the Indigenous Peoples Planning Framework consistent with ESS7, in a manner acceptable to the Bank.

   The IPPF shall be adopted and disclosed, in a manner acceptable to the Bank no later than 30 days after the Project Effective Date. The IPPF will be implemented throughout Project implementation.

   **MINSAL**

7.2 **INDIGENOUS PEOPLES PLANS:**
Prepare, adopt, and implement Indigenous Peoples Plans (IPPs) consistent with the requirements of the Indigenous Peoples Planning Framework (IPPF) to be prepared for the Project and ESS7, in a manner acceptable to the Bank.

   The specific IPPs must be submitted for the Bank’s review and approval, and thereafter adopted before carrying out any activity that requires an IPP. Once approved, the IPP is implemented throughout Project implementation.

   **MINSAL**

7.3 **GRIEVANCE MECHANISM:**
Adopt and implement the arrangements for the grievance mechanism for indigenous peoples, as required under the IPPF and further describe such arrangements in the respective IPPs. This will be an adaptation of the GM described in the SEP, to address the specificity of indigenous communities.

   Developed as part of the IPPs to be prepared in accordance with action 7.1. The grievance mechanism will operate throughout Project implementation.

   **MINSAL**

### EAS 8: Cultural Heritage

8.1 **CHANCE FINDINGS:**
Prepare, adopt, and implement a chance finds procedure as part of the ESMPs to be prepared in accordance with the ESMF.

   Same timeframe as for the implementation of the ESMPs, under action 1.3.

   **MINSAL**

8.2 **CULTURAL HERITAGE:**
Prepare, adopt, and implement a cultural heritage management plan as part of the ESMP to be prepared in accordance with the ESMF, in case impacts on cultural heritage are identified in any sub projects.

   Same timeframe as for the implementation of the ESMPs, under action 1.3.

   **MINSAL**
### ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE

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<thead>
<tr>
<th>Action Number</th>
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<th>Responsible Party</th>
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<tr>
<td><strong>10.1</strong></td>
<td><strong>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION:</strong> Update, adopt, and implement a Stakeholder Engagement Plan (SEP).</td>
<td>The draft SEP shall be updated, adopted and disclosed, in a manner acceptable to the Bank, no later than 30 days after the Project Effective Date. The SEP will be implemented throughout Project implementation.</td>
<td>MINSAL</td>
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<td><strong>10.2</strong></td>
<td><strong>PROJECT GRIEVANCE MECHANISM:</strong> Establish, maintain and operate a grievance mechanism (GRM), as described in the SEP.</td>
<td>Same timeframe as for the implementation of the SEP, under action 10.1. Once established, the GRM will be operational throughout Project implementation.</td>
<td>MINSAL</td>
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<td><strong>10.3</strong></td>
<td><strong>PROJECT GRIEVANCE MECHANISM:</strong> Provide quarterly reports to the Bank on the functioning of the GRM.</td>
<td>Submit to the Bank quarterly monitoring reports throughout Project implementation. The first report should be submitted 3 months after the Project Effective Date.</td>
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### CAPACITY SUPPORT (TRAINING)

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<th>Code</th>
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<tr>
<td><strong>FC1</strong></td>
<td>Ensure that training of Project Workers (mainly at the level of civil works) is implemented on: • Occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations. • Awareness of risks and mitigation of impacts on local communities. • Worker code of conduct</td>
<td>Training for direct Project workers will be conducted before the start of works. Training will thereafter continue throughout Project implementation.</td>
<td>MINSAL</td>
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<td><strong>FC2</strong></td>
<td>Ensure training of PIU staff is implemented on: • The Environmental and Social instruments (ESMF, SEP, LMP, IPPF) and requirements of the ESCP, and the supervision of the E&amp;S Standards and requirements of the Project.</td>
<td>Training of PIU staff will be conducted within 60 days of action 1.1.</td>
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