

**The Republic of Trinidad and Tobago  
Ministry of Health**

**Trinidad and Tobago: COVID-19 Emergency  
Response Project (P173989)**

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

**Updated on October 17, 2021**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Trinidad and Tobago (hereafter, the “Borrower”) shall implement the Trinidad and Tobago: COVID-19 Emergency Response Project (the **Project**) through the Ministry of Health (MoH) and its Project Implementation Unit (PIU). 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 World Bank Environmental and Social Standards (**ESSs**). 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 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 not conducted by the Ministry or unit referenced in the above.
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 Agreement and its amendment.
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 the Minister in charge of MoH on behalf of the Borrower. The MoH shall promptly disclose the updated ESCP.
6. Where there are Project changes, unforeseen circumstances, or Project performance results 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
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>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 grievances log.</p>	<p>Quarterly reporting throughout Project implementation submitted within 45 days after the end of each reporting period, starting from the Effective Date of the Project.</p> <p>Mid-term and completion reports shall also be submitted, as requested by the Bank, during Project implementation.</p>	<p>Project Implementation Unit (PIU) within the Ministry of Health (MoH)</p>
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>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, any COVID-19 outbreak in the Project area, improper disposal of healthcare wastes from diagnosis, treatment, and immunization activities and incidents related to security personnel following incident classification defined in the ESMF. 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.</p>	<p>Notify the Bank within 48 working hours after learning of the incident or accident. A report would be provided within a timeframe acceptable to the Bank, as requested.</p>	<p>PIU/MoH</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>		
<p>1.1 <b>ORGANIZATIONAL STRUCTURE</b></p> <p>The PIU already established under the Ministry of Health (MoH) shall be responsible for the implementation of the Project. The MoH shall hire and maintain throughout Project implementation one (1) qualified environmental and social specialist with qualifications and experience acceptable to the Bank. In addition, the MoH has already assigned and shall maintain officials as the Environmental Focal Point and Social Focal Point. The MoH shall ensure adequate time is allocated for the specialist and the Focal Points for the Project's environmental and social risk management. The Project Coordinator shall be overall responsible for coordinating the environmental and social issues with the support of the environmental and social specialist and respective focal points. The MoH shall also convene a technical oversight committee with the relevant technical lead for Environmental and Social risk management.</p> <p>MoH with PAHO shall contract consultancy services to provide advice on the vaccine roll out and vaccination site reviews to ensure that all groups are being reached as per the revised national deployment plan to reach non-English speaking persons.</p> <p>Adequate resources shall be allocated to support management of the ESHS risks of the Project.</p>	<p>An environmental and social specialist shall be contracted or assigned before the first disbursement for Component 2. The specialist and the focal points shall be retained throughout Project implementation. Before the appointment is complete, the Focal Points shall provide the necessary support to the management of E&amp;S risks and impacts.</p> <p>Before first disbursement for Component 2.</p> <p>Throughout Project implementation.</p>	<p>PIU/ MoH</p> <p>PIU/MoH</p> <p>PIU/MoH</p>

1.2	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT AND ENVIRONMENTAL AND SOCIAL MANAGEMENT PLANS</b></p> <p>a. Ensure, document and certify that adequate waste management practices, appropriate laboratory facilities and completion of key staff training on the use of the supplies and equipment following the Trinidad and Tobago’s ‘Code of Practice for Bio-Medical Waste Management’ and ‘Occupational Safety and Health Management Policy’ and the relevant World Health Organization (WHO) Guidelines for medical waste management for any retroactive financing, are implemented in a manner consistent with the ESSs. The updated ESMF shall include terms of reference for the E&amp;S audit, to be carried out to this effect.</p> <p>b. Prepare, adopt, and implement interim health and safety guidelines consistent with the ESSs.</p> <p>c. Assess the environmental and social risks and impacts of proposed Project activities, in accordance with ESS1 and the ESMF to be prepared, disclosed, consulted, and adopted for the Project, including ensuring 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 including, as relevant, with regards to vaccines. The ESMF shall also build on a comprehensive review of the Code of Practice for Bio-Medical Waste Management and an assessment/audit of relevant incinerator facilities to determine whether they currently meet WHO standards. The ESMF shall identify critical gaps (if any) and suggest appropriate measures to overcome the gaps.</p> <p>d. Prepare, disclose, adopt, and implement an Environmental and Social Management Plan (ESMP), Infection Control and Waste Management Plan (ICWMP), Community Health and Safety Plan (CHSP), and any other environmental and social management plans or other instruments required for the respective Project activities based on the assessment process, in accordance with the ESSs, the ESMF, and other relevant Good International Industry Practice (GIIP) including relevant WHO Guidelines on COVID-19 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</p>	<p>a. Throughout the retroactive financing period.</p> <p>b. Prepared by negotiations and implemented until the approval of the Environmental and Social Management Framework (ESMF).</p> <p>c. ESMF, acceptable to the Bank, to be adopted and disclosed before the first disbursement for Component 2. No activities that have any potential environmental and social risks and impacts shall be initiated within this period. Necessary screening/assessment to be conducted before the carrying out of the relevant Project activities.</p> <p>d. Plans or instruments prepared, adopted, and disclosed before the carrying out of the relevant Project activities, and thereafter implemented throughout the carrying out of such activities.</p>	PIU/MoH
-----	---	--	---------

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>who, because of their particular circumstances, may be disadvantaged or vulnerable, including, as relevant, with regards to vaccines.</p> <p>e. 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 Environmental, Social, Health and Safety (ESHS) measures, into the ESHS specifications of the procurement documents and contracts with suppliers. Thereafter ensure that the suppliers comply with the ESHS specifications of their respective contracts.</p> <p>f. 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>g. Revise the Vaccination Deployment Plan (VDP) to accommodate all nationals and non-nationals and ensure vaccination to all national and non-nationals in the country.</p>	<p>e. Before initiating the procurement process for the relevant activities and thereafter throughout the implementation of such Project activities.</p> <p>f. Before initiating the vaccination program and thereafter implemented throughout the carrying out of such activities.</p> <p>g. VDP has already been revised to include all national and non-national. Implement the VDP throughout vaccination program.</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 COVID-19 treatment.</li> <li>• Activities that may have significant adverse social impacts and may give rise to significant social conflict.</li> <li>• Activities that may involve any resettlement or land acquisition/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.c. above.</p>	<p>PIU/MoH</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.4	<p>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>Provide medical and emergency services and supplies based on the urgency of the need, in line with the latest data related to the prevalence of cases.</p>	<p>Throughout Project implementation.</p> <p>Throughout Project implementation.</p>	PIU/MoH
<b>ESS 2: LABOUR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOUR MANAGEMENT PROCEDURES</b></p> <p>Prepare, disclose, and adopt Labour Management Procedures (LMP) as part of the ESMF. 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:</p> <ul style="list-style-type: none"> <li>• Implementing adequate occupational health and safety measures (including personal protective equipment, emergency preparedness and response measures) to ensure the health and safety of Project workers, especially women, in line with the ESMF and LMP. World Health Organization (WHO) guidelines on COVID19 shall be followed in all facilities, including laboratories, quarantine and isolation centers, and screening posts</li> <li>• Establish and maintain a Grievance Redress Mechanism (GRM) as described in the LMP for health workers and any other Project workers are in place, including at the level of Regional Health Authorities</li> <li>• Incorporating labour requirements into the ESHS specifications of the procurement documents and contracts.</li> </ul>	<p>The LMP shall be finalized, adopted, and disclosed before the first disbursement for Component 2. Until then, the recommendations referenced in the interim guidelines for workplace safety and infection control and existing grievance mechanism shall apply. All measures specified in this action 2.1 to be implemented throughout Project implementation.</p>	PIU/MoH

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>		
3.1	<p><b>MEDICAL AND HAZARDOUS WASTE MANAGEMENT:</b></p> <ul style="list-style-type: none"> <li>a. 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, handling, and deployment of vaccines (including, ultra-cold chain management) in a safe manner and in accordance with the Environmental, Health and Safety Guidelines (EHSGs), and other relevant GIIP including relevant WHO guidelines.</li> <li>b. Prepare, disclose, adopt, and implement of the Infection Control and Waste Management Plan (ICWMP) as per the requirements of the ESMF.</li> <li>c. Adequately manage and dispose of health care wastes (including vaccines) and other types of hazardous and non-hazardous wastes, including appropriate selection and safe usage and disposal of personal protective equipment (PPE) and relevant medical evaluation and health surveillance of PPE users following actions 1.2a-d. The PIU/MoH shall adopt the proven technology and procedure on medical waste management including auditing for appropriate treatment and disposal. Given the potential resource scarcity in the face of an outbreak, the PIU/MoH shall commit to the provision of services and supplies based on the urgency of the need, in line with the latest data related to the prevalence of the cases.</li> </ul>	<ul style="list-style-type: none"> <li>a. Throughout Project implementation.</li> <li>b. Same timeframe as for the preparation and implementation of the ESMP, under action 1.2.d.</li> <li>c. Throughout Project implementation.</li> </ul> <p>PIU/MoH</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>COMMUNITY HEALTH AND SAFETY</b></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; to ensure that the public is safe from potential wastes, especially disposed biohazardous materials and PPE; risk associated with visits to health centers; and 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 labour influx and prevent and respond to sexual exploitation and abuse, and sexual harassment</p> <p>b) A Community Health and Safety Plan (CHSP) shall be developed by the Borrower as part of the ESMF.</p>	<p>a) Throughout Project implementation</p> <p>b) Same timeframe as for the preparation and implementation of the ESMF, under action 1.2.</p>	<p>PIU/MoH</p> <p>PIU/MoH</p>
4.2	<p><b>OTHER COMMUNITY HEALTH AND SAFETY ISSUES</b></p> <p>a) The Borrower shall put measures in place to prevent or minimize the spread of the infectious disease/COVID-19 to the community.</p> <p>b) The Borrower shall ensure that an emergency response plan is in place for laboratory operations and implement laboratory emergency preparedness measures in case of laboratory accidents/ emergencies (e.g., a fire response or natural phenomena event). In addition, the Borrower shall operate quarantine and isolation centers in line with the applicable requirements of national standards, ESS4, the World Bank Group Environmental, Health and Safety Guidelines (EHSGs) and other relevant GIIP including the WHO guidelines on “Key considerations for repatriation and quarantine of travelers in relation to the outbreak of novel coronavirus 2019-nCoV”.</p>	<p>a) Throughout Project implementation</p> <p>b) Same timeframe as for the preparation and implementation of the ESMF, under actions 1.2.</p>	<p>PIU/ MoH</p> <p>PIU/MoH</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>4.3 <b>USE OF SECURITY FORCES:</b> In case the Borrower's Security Forces are used in the implementation of Project activities and/or for provision of security to Project workers, sites and/or assets, the MoH shall adopt the following measures, in coordination with other competent authorities as needed and as relevant:</p> <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, 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 labour influx; and prevent and respond to sexual exploitation and abuse (SEA), and sexual harassment (SH) or excessive use of force;</li> <li>c. Ensure that such forces are 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>	<p>a) Assessment carried out in the same timeframe than action 1.2 a) above and any required measures shall be adopted before deploying security or military personnel under the Project and thereafter implemented throughout Project implementation.</p> <p>b) and c) before deploying security or military personnel under the Project and thereafter throughout Project implementation.</p> <p>d) and e) as set out under actions 10.1 and 10.2 respectively.</p>	<p>PIU/MoH</p>
<p><b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b></p>		
<p>ESS5 is not currently relevant.</p>		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
	ESS6 is currently not relevant		
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
	ESS7 is currently not relevant.		
<b>ESS 8: CULTURAL HERITAGE</b>			
	ESS8 is currently not relevant.		
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
	ESS 9 is currently not relevant		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b></p> <p>Prepare or revise, 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.</p>	<p>A draft SEP was already prepared and disclosed prior to project appraisal.</p> <p>The SEP shall be updated and redisclosed to include information related to the vaccination program before approval of the restructuring.</p> <p>The draft SEP shall be further revised after public consultations have been held and prior to the first disbursement for Component 2. The SEP shall be implemented throughout Project implementation.</p> <p>Once approved by the Bank, the final SEP shall be publicly disclosed online by the Borrower in an easy to access location.</p>	PIU/MoH

10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>An accessible grievance mechanism shall be established, 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 GRM is already in place and shall be adjusted, maintained, and implemented throughout Project implementation. The existing GRM arrangements are described in the SEP which shall be adopted before the first disbursement for Component 2.</p>	<p>PIU/MoH</p>
<b>CAPACITY SUPPORT (TRAINING)</b>			
CS1	<p><b>TRAINING</b></p> <p>Project Implementation 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>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. The MoH shall ensure that the Regional Health Authorities are aware of the Project GRM and its functioning and contact points for referrals.</p> <p>Armed forces shall be trained on the applicable standards and code of conduct in line with the guidance provided in the Bank’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>Within one month after adoption of the E&amp;S instruments and periodically with the addition of new Project team members as they join the Project throughout implementation.</p>	<p>PIU/MoH</p>