

# Montenegro

## Montenegro Emergency COVID-19 Response Project (P176492)

### Draft for Appraisal ENVIRONMENTAL and SOCIAL COMMITMENT PLAN (ESCP)

March 18, 2021

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Montenegro, through the Ministry of Health (MoH) will implement the Montenegro Emergency COVID-19 Response Project (the **Project**). The International Bank for Reconstruction and Development (hereinafter the Bank) has agreed to provide financing for the Project.
2. Montenegro 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, any specific documents, or plans, as well as the timing for each of these.
3. Montenegro will also comply with the provisions of any other E&S documents required under the ESF and referred to in this ESCP, such as Environmental and Social Management Plan (ESMP) Checklists, and Stakeholder Engagement Plans (SEP), and the timelines specified in those E&S documents.
4. Montenegro 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 Montenegro 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 Montenegro, 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, Ministry of Health (for Montenegro) 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 Ministry of Health (for Montenegro). The Ministry of Health 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 Montenegro shall provide additional funds, if needed, to implement actions and measures to address such risks and impacts, which may include environmental impacts related to COVID19 prevention and disease control, medical waste management, rehabilitation and other works (e.g. management and disposal/processing of hazardous and construction waste), health, and safety impacts (e.g. operating heavy machinery, working with high voltage, accidental situations, etc.), community impacts due to traffic disturbance and safety of local communities (including form impacts of COVID19 spread), as well as impacts to protected cultural heritage.

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, implementation of the ESCP status of preparation and implementation of E&amp;S documents required under the ESCP, stakeholder engagement activities, functioning of the grievance mechanism(s).</p>	<p><i>Quarterly throughout Project implementation starting from the Effective Date</i></p> <p><i>Semi-annually within the Project Progress Report</i></p>	<p>PIU MoH</p>
B	<p><b>INCIDENTS AND ACCIDENTS NOTIFICATION</b></p> <p>Prepare and implement an incident reporting procedure, indicating details of the incident, institutional responsibilities, immediate measures to address the reported incident and information requirements to be provided by the contractor or supervision engineer as appropriate.</p> <p>Promptly notify the Bank within 48 hours 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 health and safety serious injuries and road accidents.</p> <p>Upon Bank's request prepare a report with sufficient detail regarding the incident or accident, occurred and potential impacts, findings, indicating immediate measures or corrective actions taken or that are planned to be taken to address the incident, legal implications and requirements, list of affected parties, compensation paid or planned, and any other information needed, as appropriate.</p>	<p><i>The incident reporting procedure shall be prepared within 30 days following loan effectiveness (as a standalone or as a part of the ESMF)</i></p> <p><i>and</i></p> <p><i>Maintained throughout Project implementation.</i></p> <p><i>Notify the Bank within 48 hours after learning of the incident or accident.</i></p>	<p>PIU MoH</p>
C	<p><b>CONTRACTORS MONTHLY REPORTS</b></p> <p>Require all contractors to provide monthly monitoring reports to the Project Implementing Unit (PIU). Such reports should be submitted for the Bank Component 1 activities with moderate and substantial environmental and social risks.</p>	<p><i>Providing monthly ESMPs implementation and OHS issues reports.</i></p>	<p>PIU MoH</p>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>MoH shall utilize Project Implementation Unit (PIU) already established under Ministry of Economic Development to implement the World Bank supported Second Energy Efficiency Project (MEEP2; P165509). The PIU already employs E&amp;S Expert on half-time basis. As this type of engagement is assessed as insufficient to meet the needs for managing E&amp;S aspects of both Projects, the PIU shall ensure engagement of a full-time E&amp;S specialist for the duration of the Project. Though MEEP2 operates under Safeguards Policies, PIU has received a general ESF training. MoH shall ensure PIU maintains organizational structures with qualified staff and resources to support the management of environmental, social, health &amp; safety (ESHS) risks and impacts of the Project including a minimum of one full-time environment and social risk management specialists. To strengthen capacity to implement the Project, the PIU shall be strengthened with one full time Stakeholder Engagement, Outreach and Grievance specialist.</p>	<p><i>PIUs with qualified staff (at least one full-time E&amp;S specialist) and resources shall be maintained throughout Project implementation.</i></p> <p><i>MoH shall recruit one full time Environmental specialist and one full time Social Specialist (responsible for stakeholder engagement/outreach, labor issues and the project Grievance Mechanisms) one full time Stakeholder Engagement, outreach and Grievance specialist before carrying out the E&amp;S relevant Project activities and shall thereafter retain said specialists throughout Project implementation.</i></p> <p><i>The MoH E&amp;S Focal Point will be appointed no later than 30 days following the date of the Loan Agreement effectiveness.</i></p>	<p>PIU MoH</p>
1.2	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENT</b></p> <p>Prepare, disclose and adopt Environmental and Social Management Framework (ESMF) for Project to set out policies and procedures to address the environmental and social risks and impacts of the Project in accordance with ESS1 and other relevant ESSs in a manner acceptable to the Bank. Templates and guidelines for adequate implementation of Infection Control and Medical Waste Management Plans (ICMWMPs), Hazardous Waste Management Plan shall be a mandatory content of ESMF.</p>	<p><i>The ESMFs shall be prepared no later than 30 days following the date of the Loan Agreement effectiveness for Component 1 and Component 2 respectively, and shall be Implemented throughout Project duration.</i></p> <p><i>Until the ESMF is approved the Project shall apply the WHO standards on COVID19 response in a manner consistent with ESS1.</i></p>	<p>PIU MoH</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
<p>1.3 <b>MANAGEMENT TOOLS AND INSTRUMENTS</b></p> <p>(a) Prepare, disclose, adopt, and implement environmental and Social Management Plan (ESMP) Checklists, Infection Control and Medical Waste Management Plans (ICMWMPs), Cultural Heritage management Plans (CHMPs), Hazardous Waste Management Plan, or other instruments required under the ESMF, in accordance with the relevant ESSs, and other relevant Good International Industry Practice (GIIP) including the WHO Country &amp; Technical Guidance - Coronavirus disease (COVID-19) and the WHO Guidelines on Safe Management of Wastes from Health-Care Activities in a manner acceptable for the Bank.</p> <p>(b) Incorporate the relevant aspects of this ESCP, including, LMP, WMP, ICMWMP, 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>(c) Include environment and social considerations in line with the requirements of the ESSs in the terms of reference (TORs) for all hired consultants and submit them to the Bank for no objection.</p>	<p><i>The ESMFs (including templates and guidelines for preparation of ESMP Checklists, Infection Control and Medical Waste Management Plans (ICMWMPs), Hazardous Waste Management Plan, or other instruments required under the ESMF) shall be prepared no later than 30 days following the date of the Loan Agreement effectiveness for Component 1 and Component 2 respectively, and shall be implemented throughout Project duration.</i></p> <p><i>ESMF defined plans or instruments shall be prepared before launching the procurement process for the relevant activities, and thereafter, ensure that contractors and supervising firms comply with the ESHS specifications in their contracts through their involvement in the respective Project activities.</i></p> <p><i>Implemented throughout Project duration.</i></p>	<p>PIU MoH</p>
<p>1.4 <b>MANAGEMENT OF CONTRACTORS</b></p> <p>PIU shall develop and implement procedures for managing Contractors and subcontractors.</p> <p>Incorporate the obligation of prepared Labor Management Procedures (LMP) and ESMP Checklist into the contractual agreements with contractors and subcontractors.</p> <p>Environmental and Social obligations shall be included in all bidding documents including the contractual agreements.</p>	<p><i>Prior to the preparation of procurement documents.</i></p> <p><i>Prior to signature of contracts</i></p> <p><i>Implementation of the management tools and instruments required throughout Project implementation</i></p> <p><i>Supervision of contractors throughout Project implementation</i></p>	<p>PIU MoH</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.5	<p><b>EXCLUSIONS</b></p> <p>The following types of activities shall not be eligible for finance 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 a 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 affect lands or rights of vulnerable minorities,</li> <li>• Activities that may involve permanent resettlement or land acquisition or adverse impacts on cultural heritage,</li> <li>• Activities related to public and private buildings classified as cultural heritage.</li> </ul> <p>All the other excluded activities set out in the ESMFs of the Project.</p>	<p><i>These exclusions shall be applied as part of the assessment process conducted under action 1.2.a. above.</i></p>	<p>PIU MoH</p>
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>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 grievance arrangements for Project workers, and incorporating labor requirements into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms.</p> <p>The Borrower shall prepare and include in the ESMF Labor Management Procedures addressing labor and OHS issues related to exposure to COVID19 and beyond, before the carrying out the relevant Project activities.</p> <p>The necessary protocols for treating patients and handling medical waste, disinfectant protocols, regular testing of healthcare workers, requirements for proper disposal of sharp objects, along with the environmental health and safety guidelines for staff and necessary Personal Protective Equipment (PPE), shall be included in the Infection Control and Medical Waste Management Plan (ICMWMP) to be adopted by and then implemented by health facilities and laboratories participating in the project.</p>	<p><i>The ESMF (including LMP) to be prepared no later than 30 days following the date of the Loan Agreement effectiveness</i></p> <p><i>Labor Management Procedures shall be applied throughout Project implementation.</i></p>	<p>PIU MoH</p>
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Develop, maintain, and operate a grievance mechanism (GM) for Project workers as described in the LMP and consistent with national labor legislation and the ESS2 requirements.</p> <p>Ensure contractor(s) to develop their GM for their employees as per Contractor-LMP.</p>	<p><i>A GM shall be operational for Project activities not later than 30 days following the date of the Loan Agreement effectiveness. The GM shall be used throughout Project implementation.</i></p>	<p>PIU MoH</p>
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY (OHS) MEASURES</b></p> <p>As part of the ESMFs specified in 1.2, develop and implement occupational health and safety measures (OHS) for project workers in accordance with ESS2.</p>	<p><i>The ESMFs (including OHS) shall be prepared no later than 30 days following the date of the Loan Agreement effectiveness</i></p>	<p>PIU MoH</p>
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
3.1	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Relevant aspects of this standard shall be considered, as needed, under action 1.2 above, including, inter alia, measures to manage health care wastes, hazardous wastes (replaced X-ray or CT scans) and other types of hazardous and non-hazardous wastes.</p>	<p><i>The Project ESMF (including health care wastes, and hazardous wastes aspects) shall be prepared no later than 30 days following the date of the Loan Agreement effectiveness and shall be Implemented throughout Project duration.</i></p>	<p>PIU MoH</p>
3.2	<p><b>MANAGEMENT OF WASTE AND HAZARDOUS MATERIALS</b></p> <p>As part of the ESMF specified in 1.2, develop and implement measures and procedures for management of waste and hazardous materials during demolition, dismantling and disposal, namely Hazardous Waste Management Plan. ESMF shall include the requirements on the disposal of medical waste in accordance with the Infection Control and Medical Waste Management Plan (ICMWMP), which is part of the ESMF, to proper licensed hazardous waste management facilities (if any). Hazardous Waste Management Plan will be developed for finds of asbestos and management of waste that may come from replaced X ray machines and other procured equipment. Operating procedures developed for purchased equipment (X-ray and CT scans, bloodmobile) will include safety procedures, waste management requirements, end-of-life plan of action and other relevant EHS requirements.</p>	<p><i>The ESMFs (including management of waste and hazardous materials) shall be prepared no later than 30 days following the date of the Loan Agreement effectiveness for Component 1 and Component 2 respectively, and shall be Implemented throughout Project duration.</i></p>	<p>PIU MoH</p>
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>COMMUNITY HEALTH AND SAFETY:</b></p> <p>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 (SEA/SH).</p>	<p><i>The ESMFs (including management of waste and hazardous materials) shall be prepared no later than 30 days following the date of the Loan Agreement effectiveness for Component 1 and Component 2 respectively, and shall be Implemented throughout Project duration.</i></p>	<p>PIU MoH</p>
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
Not considered currently relevant.			
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			



Not considered currently relevant.			
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
Not relevant.			
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<p><b>CULTURAL HERITAGE:</b> As part of the ESMF specified in 1.2, consider relevant aspects of this standard and develop and implement measures and procedures for protection of cultural heritage.</p> <p>Cultural Heritage Management Plan (CHMP) shall be developed for all sub-projects with potential impacts on cultural heritage.</p>	<p><i>The ESMF (including templates and guidelines for preparation of CHMPs) shall be prepared no later than 30 following the date of Loan Agreement effectiveness, and implemented throughout Project duration.</i></p> <p><i>Cultural Heritage Management Plans (CHMPs) will be prepared as stand-alone documents or a part of ESMP Checklist prior to Bidding of works and incorporated into Bidding documents</i></p>	PIU MoH
8.2	<p><b>CHANCE FINDS:</b> The chance finds procedures shall be part of the ESMF and shall be applicable to all contracts involving any works under the project.</p>	<p><i>The ESMF (including chance finding procedures) shall be prepared no later than 30 following the date of Loan Agreement effectiveness, and implemented throughout Project duration.</i></p>	PIU MoH
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
Not relevant.			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b> Update, disclose, adopt, and implement a Stakeholder Engagement Plan (SEP) consistent with ESS10, in a manner acceptable to the Bank.</p>	<p><i>An initial SEP has been prepared and disclosed and shall be updated and disclosed no later than 30 days after the date of Loan Agreement Effectiveness.</i></p> <p><i>The SEP shall be implemented throughout the Project implementation period.</i></p>	PIU MoH

10.2	<p><b>PROJECT GRIEVANCE MECHANISM:</b>                  Accessible grievance mechanism (GM) and grievance arrangements shall be made publicly available to receive and facilitate resolution of concerns and grievances in relation to the Project, consistent with ESS10, in a manner acceptable to the Bank.</p>	<p><i>A GM for Project shall be operationalized no later than 30 days after the date of Loan Agreement Effectiveness and kept operational throughout.</i></p>	<p>PIU MoH</p>
<b>CAPACITY SUPPORT (TRAINING)</b>			
CS1	<p><b>TRAINING OF PIU STAFF</b>                  PIU staff is experienced in Safeguards while also trained in ESF, thus general, basic training shall be provided only when needed (e.g. as a part of PIU capacity maintenance).                  Project tailored, COVID19 specific in-depth training shall be provided to existing PIUs’ environmental and Stakeholder Engagement, outreach and grievance specialist as well as to all other staff responsible for ensuring full compliance with the ESF and relevant instruments on:</p> <ul style="list-style-type: none"> <li>• OHS, environmental and social assessments,</li> <li>• ESMP Checklist preparation,</li> <li>• Labour influx, community health and safety,</li> <li>• Stakeholder engagement and grievance redress,</li> <li>• WHO Guidelines on Safe Management of Wastes from Health-Care Activities</li> <li>• National sanitary norms and regulations.</li> <li>• Codes of conduct</li> <li>• Monitoring and reporting, and</li> <li>• Other relevant topics.</li> <li>• In addition to the Project specific, basic training shall be provided to all PIU newcomers on basic ESF and related environmental and social issues;</li> </ul>	<p><i>If deem needed, general ESF training shall take place within three months after the Project Effectiveness Date as a part of regional ESF trainings for PIU or provided by WB E&amp;S Specialists supporting the Project.</i></p> <p><i>Specific, Project tailored in-depth trainings shall be carried out at least once a year, or more frequently as needed, during project implementation.</i></p>	<p>PIU MoH</p>
CS2	<p><b>TRAINING FOR CONTRACTORS’ STAFF</b>                  Provide training on implementation of environmental and social due diligence documents (e.g. ESMP Checklists, OHS, labour influx, community health and safety, stakeholder engagement, grievance redress, codes of conduct, etc.) to all staff working with contractors and sub-contractors that are responsible for environment, and social issues.</p>	<p><i>Prior to commencing works</i></p>	<p>PIU</p>