Appraisal Environmental and Social Review Summary

Appraisal Stage

(ESRS Appraisal Stage)

Date Prepared/Updated: 03/25/2020 | Report No: ESRSA00587
## BASIC INFORMATION

### A. Basic Project Data

<table>
<thead>
<tr>
<th>Country</th>
<th>Region</th>
<th>Project ID</th>
<th>Parent Project ID (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gambia, The</td>
<td>AFRICA</td>
<td>P173798</td>
<td></td>
</tr>
<tr>
<td><strong>Project Name</strong></td>
<td><strong>The Gambia COVID-19 Preparedness and Response Project</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Practice Area (Lead)</strong></td>
<td><strong>Health, Nutrition &amp; Population</strong></td>
<td><strong>Financing Instrument</strong></td>
<td><strong>Estimated Appraisal Date</strong></td>
</tr>
<tr>
<td></td>
<td>Investment Project Financing</td>
<td>3/20/2020</td>
<td>3/31/2020</td>
</tr>
<tr>
<td><strong>Borrower(s)</strong></td>
<td>Implementing Agency(ies)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Gambia</td>
<td>Ministry of Health</td>
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</tbody>
</table>

**Proposed Development Objective(s)**
To prevent, detect and respond to the threat posed by COVID-19 and strengthen national system for public health preparedness

<table>
<thead>
<tr>
<th>Financing (in USD Million)</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Project Cost</td>
<td>10.00</td>
</tr>
</tbody>
</table>

### B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?
No

### C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]
The proposed project will support the implementation of The Gambia COVID-19 Plan endorsed by the Minister of Health (on March 6, 2020): Emergency COVID-19 Response; Strengthening Multi-sector, National Institutions and Platforms for Policy Development and Coordination of Prevention and Preparedness using One Health approach; Supporting National and Sub-national, Prevention and Preparedness; and Implementation Management and Monitoring and Evaluation

### D. Environmental and Social Overview
D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social]
This COVID-19 Preparedness and Response Project will complement the longer-term development work in the Health Sector, including a) the ongoing WBG-financed Maternal and Child Nutrition and Health Results Project (P143650) which seeks to increase the utilization of community nutrition and primary maternal and child health services and is scheduled to close June 30, 2020 and b) the pipeline The Gambia Universal Health Coverage for Human Capital Development Project (P173287) which seeks to improve utilization and quality of essential health services, and improve financial protection in The Gambia. The proposed Project will be implemented throughout The Gambia and will contribute to improved COVID-19 prevention, detection and response through 4 components: Emergency Response; Strengthening national disease surveillance and diagnostic capacities; Support for National and Sub-national, Prevention and Preparedness; and Project Implementation. The project has national coverage, with some specific existing facilities identified as treatment and isolation centers (Sanatorium treatment center, Soma treatment center, Essau isolation rooms, Brikama isolation center, and Basse isolation center) for the care of patients which will be renovated and equipped. Thus, the proposed project will not endanger natural habitats or cultural sites. Further, one of the components of the proposed project will improve healthcare waste management in the region where most of the confirmed cases will be treated (ie Sanatorium treatment center in the Western region). Additionally, biohazard bags and plastic pedal bins will be procured for all health facilities.

D. 2. Borrower’s Institutional Capacity

The project will be implemented by the Project Coordination Unit (PCU) of the Ministry of Health (MoH). The proposed project is the first in the Gambia to employ the new Environmental and Social Framework. The MOH has assigned focal points for environmental safeguards and social safeguards. Additionally, an Operations Officer will be assigned to the PCU or recruited to assist the focal points in managing and monitoring the social and environmental risks and impacts of the project.

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC) Substantial

Environmental Risk Rating Substantial

The environmental risk classification for the project is Substantial under the World Bank ESF, mainly because of the risks linked to the management of biomedical waste (especially handling highly infectious medical wastes such as COVID-19). The risks linked to the renovation of isolation and treatment centers are moderate given that they revolve largely around occupational health and safety and construction waste management. Labor management and health and safety risks will be taken into account across the project through the application of WHO protocols. The capacity of the MOH to manage the environmental and social (E&S) risks will be built through ongoing support and training by World Bank officers as well as dedicated focal points for environmental and social safeguards and the recruitment of an Operations Officer.

Social Risk Rating Moderate

Misinformation and rumors regarding COVID-19, and stigma for those who will be quarantined or admitted to isolation and treatment centers is a project risk. However, one of the components of the proposed project entails risk communication, social mobilization and community engagement to raise public awareness and knowledge on prevention and control of COVID-19 among the general population and vulnerable groups. Beyond conflicts resulting from false rumors, vulnerable groups are at risk being excluded from vital services, and quarantine interventions could entail sexual exploitation and abuse; as well as culturally inappropriate accommodation and services. In
addition, there might be some labor management and OHS risks in relation to the building/renovation of facilities. The project’s ESMF will outline how these risks will be managed, through both project design that focuses on communications and behavior change around the pandemic, and specific application of WHO protocols for managing quarantine and isolation facilities.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

**Overview of the relevance of the Standard for the Project:**

The project will have positive impacts as it should improve COVID-19 surveillance, monitoring and containment. However, the project could also cause significant environment, health and safety risks due to the dangerous nature of the pathogen (COVID-19) and reagents and other materials to be used in the project-supported laboratories and quarantine facilities. Healthcare associated infections due to inadequate adherence to occupational health and safety standards can lead to illness and death among health and laboratory workers. The laboratories and relevant health facilities which will be used for diagnostic testing and isolation of patients can generate biological waste, chemical waste, and other hazardous bioproducts.

To mitigate against the risk of project staff contracting the virus, the project will develop an Environmental and Social Management Framework (ESMF) based on WHO protocols for managing risks associated with COVID-19. The ESMF will adequately cover environmental and social infections control measures and procedures for the safe handling, storage, and processing of COVID-19 materials including the techniques for preventing, minimizing, and controlling environmental and social impacts during the operation of project supported laboratories and medical facilities. The relevant parts of WHO’s COVID-19 Quarantine Guideline and COVID-19 biosafety guidelines will be incorporated into the ESMF. These guidelines include provisions to address the needs of patients, including the most vulnerable. They also include provisions for the establishment of quarantine and isolation centers and their operation considering the dignity and needs of patients. The proposed project will also provide emergency medical and non-medical supplies including Personal Protective Equipment PPEs such as gloves, surgical mask, respirator, eye protection and isolation gowns to health workers for their safety and other infection prevention and control materials (such as detergents and disinfectants, and safety/sharp boxes).

The firms that will be recruited for renovation of isolation and treatment centers must develop the Environmental and Social Management Plan (ESMP), integrating the risks and mitigation measures during the preparation and construction phase. This document must be approved before the start of works. Further, each laboratory that is handling COVID-19 will also develop an ESMP that builds on WHO protocols to ensure safe handling and infections control.

To manage healthcare waste, the final ESMF will include a medical waste management plan that builds on best international practice and WHO protocols for its collection, storage, transportation and final disposal.

ESS10 Stakeholder Engagement and Information Disclosure

Stakeholder engagement is a critical tool for social and environmental risk management, project sustainability and success. The proposed project will support a communication, mobilization, and community engagement campaign to
raise public awareness and knowledge on prevention and control of COVID-19 among the general population and contribute to strengthening the capacities of community structures in promoting coronavirus prevention messages.

The Project’s draft Stakeholder Engagement Plan (SEP) will be updated throughout project implementation as the client engages in continuous, meaningful and safe consultations on policies, procedures, processes and practices (including grievances) with all stakeholders throughout the project life cycle, and provide them with timely, relevant, understandable and accessible information. A project-wide grievance redress mechanism (GRM), proportionate to the potential risks and impacts of the project will be established in the final SEP.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

Project activities will be performed by mostly healthcare and laboratory personnel and firms that will be recruited for the renovation of isolation and treatment centers. During implementation the client will include Labor Management Procedures (LMPs) in contracts that will set out the way in which project workers will be managed in accordance with the requirements of national law and the ESS2. Key issues to be addressed in the LMPs for the construction companies include terms and conditions of employment, nondiscrimination and equal opportunity, and establishing/managing worker’s organizations. Due diligence is also needed to ensure the client meets requirements on child labor, forced labor and occupational health and safety. The LMP will include measures to ensure that labor is provided on a voluntary basis and will further ensure that the health and safety of workers, especially women, are given adequate attention. It will also have the details of the grievance redress mechanism for workers and the roles and responsibilities for monitoring such workers. For healthcare and laboratory personnel, a key issue to be addressed in the LMPs will be contamination with COVID-19. The project will ensure the application of occupational health and safety measures according to WHO guidelines.

ESS3 Resource Efficiency and Pollution Prevention and Management

Vegetation and soil loss: The clearance and loss of areas of vegetation and faunal habitat is not expected. The environmental impact of the infrastructure activities will be assessed in the ESMF. The required building material will potentially include stones, sand, concrete blocks or timber must be obtained from authorized quarries.

Air emissions: During the rehabilitation of infrastructures, air emissions may include fugitive dust. Those most likely to be affected are people living within the proximity of these infrastructure sites but also the workers. The implementation of mitigation measures such as dust suppression and vehicle maintenance will be applied to minimize the impact of air emissions during construction, wearing suitable masks, and residual impacts are expected to be limited in scope and duration.

Waste management: Highly infectious medical waste is expected from the handling of COVID-19. The ESMF will include a plan for health care waste management plan for health facilities. Waste from rehabilitation works will be covered by the site waste management plan, which will be developed by the contractors as part of their ESMPs.
ESS4 Community Health and Safety

Inappropriate handling of COVID-19 can expose the community to further spread of the disease. The ESMF will describe the measures in place to prevent or minimize the spread of COVID-19 for laboratories, quarantine and isolation centers, and screening posts. It will cover procedures for waste management of contaminated materials, protocols on the transport of samples, and workers cleaning before leaving the work place back into their communities, among others.

The quarantine and isolation centers will also ensure that communities, COVID-19 patients and their families are treated with respect and dignity, in reference to infrastructure, accommodation and supplies, and communication.

The project will put in measures to avoid any form of Sexual Exploitation and Abuse/Harassment (SEA/H) by following the WHO Code of Ethics and Professional conduct for all workers in the quarantine facilities as well as the provision of gender-sensitive infrastructure such as segregated toilets and adequate light in quarantine and isolation centers. Also, special attention will be given to remote and border areas to avoid conflict between host communities and refugees/IDPs.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

Almost all construction is expected to be undertaken within existing facilities; therefore, ESS5 is not considered relevant at this point. In case a need for land acquisition leading to economic or physical displacement emerges during project implementation, Resettlement Action Plans (RAPs) would be developed to the satisfaction of the Bank prior to commencement of any civil works/construction.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

This standard is currently not relevant as the project’s small-scale construction activities are not expected to impact the integrity of biodiversity or living natural resources.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

This standard is not relevant as there are no Indigenous Peoples/Sub-Saharan Historically Underserved Traditional Local Communities in the project area of influence.

ESS8 Cultural Heritage

This standard is not relevant at this time as the limited civil works are unlikely to affect cultural assets. Out of an abundance of caution, the ESMF will include measures for “Chance Finds” of archaeological or other cultural heritage.

ESS9 Financial Intermediaries
This standard is not relevant for the suggested project interventions.

### C. Legal Operational Policies that Apply

| OP 7.50 Projects on International Waterways | No |
| OP 7.60 Projects in Disputed Areas | No |

### III. BORROWER’S ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

<table>
<thead>
<tr>
<th>DELIVERABLES against MEASURES AND ACTIONS IDENTIFIED</th>
<th>TIMELINE</th>
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<tbody>
<tr>
<td>ESS 1 Assessment and Management of Environmental and Social Risks and Impacts</td>
<td>05/2020</td>
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<tr>
<td>Environmental and Social Management Framework (ESMF)</td>
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</tr>
<tr>
<td>Environmental and Social Management Plans (ESMPs) for treatment/isolation centers</td>
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<td>ESS 10 Stakeholder Engagement and Information Disclosure</td>
<td>03/2020</td>
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<td>Stakeholder Engagement Plan</td>
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<tr>
<td>ESS 2 Labor and Working Conditions</td>
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<tr>
<td>ESS 3 Resource Efficiency and Pollution Prevention and Management</td>
<td>n/a</td>
</tr>
<tr>
<td>ESS 4 Community Health and Safety</td>
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</tr>
<tr>
<td>ESS 8 Cultural Heritage</td>
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</tbody>
</table>
B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework?  
No

Areas where “Use of Borrower Framework” is being considered: 

n/a

IV. CONTACT POINTS

World Bank
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Borrower/Client/Recipient
Borrower: The Gambia
Implementing Agency(ies)
Implementing Agency: Ministry of Health

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

Task Team Leader(s): Samuel Lantei Mills
Practice Manager (ENR/Social) Valerie Hickey Cleared on 25-Mar-2020 at 08:41:33 EDT
Safeguards Advisor ESSA Nina Chee (SAESSA) Concurred on 25-Mar-2020 at 14:54:13 EDT