

**Democratic Socialist Republic of Sri Lanka  
Ministry of Health**

**Sri Lanka Maternity and Early Childhood  
Nutrition Service**

**P180886  
[Draft]**

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

**24 April 2024**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Democratic Socialist Republic of Sri Lanka (the Recipient) will implement the Sri Lanka Maternal and Early Childhood Nutrition Services Project (the Project), with the involvement of the Ministry of Health, as set out in the Grant Agreement. The International Development Association (the World Bank) is acting as the implementing agency and the Japan Social Development Fund (JSDF) of the Government of Japan has agreed to provide the financing for the Project, as set out in the referred agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the World Bank. The ESCP is a part of the Grant Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring, and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESS, and in form and substance, and in a manner acceptable to the World Bank. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the World Bank.
4. As agreed by the World Bank and the Recipient], this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient through Ministry of Health and the World Bank agree to update the ESCP to reflect these changes through an exchange of letters signed between the World Bank and the Recipient Secretary of the Ministry of Health. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
<b>MONITORING AND REPORTING</b>			
A	<p><b>REGULAR REPORTING</b></p> <p>Prepare and submit to the World 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 instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>	<p>Bi-Annual reports to the World Bank throughout Project implementation, commencing after the Effective Date. Submit each report to the World Bank no later than 15 days after the end of each reporting period.</p>	MoH
B	<p><b>INCIDENTS AND ACCIDENTS</b></p> <p>Promptly notify the World 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, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury including from exposure to toxic chemicals, health care wastes, fire, natural disasters. Provide sufficient detail regarding the scope, severity, and possible causes of 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/or supervising firm, as appropriate.</p> <p>Subsequently, at the World Bank’s request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.</p>	<p>Notify the World Bank no later than 48 hours after learning of the incident or accident.</p> <p>Provide subsequent report to the World Bank within a timeframe acceptable to the World Bank</p>	<p>MoH, Directorate of Environmental and Occupational Health, Disaster Preparedness and Response Unit of the Ministry of Health, RDHS &amp; PDHS of relevant project districts</p>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>The Directorate of Environmental and Occupational Health of the MOH will assign qualified staff including a focal point to support management of Environment and Social (E&amp;S) risks and impacts of the project.</p>	<p>Assign adequate staff including a focal person within the Directorate of Environmental and Occupational Health of the MOH as set out in the Grant Agreement no later than 3 months from Project Effectiveness, and thereafter maintain the position throughout Project implementation.</p>	MoH
1.4	<p><b>TECHNICAL ASSISTANCE</b></p>	<p>Throughout Project implementation.</p>	MoH

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the World Bank, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.		
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT:</b> Follow labor regulations of the country and ensure that project workers including workers from the Thripasha Factory, Civil Society Organizations, Consultant firms, and government are engaged in the implementation of the Activities consistent with ESS2.</p> <p>To this end, ensure that the following measures are carried out:</p> <p>a) Provide workers with information and documentation that is clear and understandable regarding their terms and conditions of employment through written contracts setting out their rights, including, inter alia, rights related to hours of work, wages, overtime, compensation and benefits, as well as written notice of termination of employment, and details of severance payments, as applicable;</p> <p>b) Implement occupational health and safety (including personal protective equipment, and emergency preparedness and response for emergencies such as fire and natural disasters ) measures, taking into account the General Environmental, Health and Safety Guidelines (EHSGs), and other relevant Good International Industry Practice (GIIP) and, as appropriate, the industry-specific EHSGs and other Good International Industry Practice (GIIP) Factories Ordinance and the relevant regulations in Sri Lanka.</p> <p>c) Implement measures, as applicable, to, inter alia: (i) prevent the use of all forms of forced labor and child labor; (ii) enable workers to benefit from, inter alia, access to grievance and redress mechanisms without fear of retaliation; and effective freedom to form and join workers organizations or alternative mechanisms for expressing their concerns and protect their rights related to labor and working conditions;</p> <p>d) Ensure availability of proper working conditions, resting &amp; dining places, water and sanitation facilities for project workers.</p>	Adopt labor management measures from the time of Project commencement and thereafter throughout Project implementation.	MoH

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	<p>e) Implement employee code of conduct / ethics, which shall include measures to prevent and respond to SEA and SH incidents.</p> <p>f) Incorporate the relevant requirements above in the ESHS specifications of the procurement documents and contracts with third parties that engage workers in the implementation of the Activities.</p> <p>g) For community workers, measures should be in place to ensure their health and safety, and rules to prohibit child labor and forced labor.</p>		
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish and operate a grievance mechanism (including handling of SEA/SH related complaints) for Project and factory Civil Society Organizations, Consultants/ Consultancy firms, government and health workers, consistent with ESS2.</p>	Establish grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.	MoH, Sri Lanka Thriposha Limited, MoH Health Workers, Civil Society Organizations, Consultants/ Consultancy Firm hired by MoH
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>WASTE MANAGEMENT PLAN</b></p> <p>Adopt and implement a General Waste Management Plan (GWMP)t to manage food and other general waste within Thriposha Factory in consistent with ESS3 and existing Country regulations</p>	Establish a GWMP before initiating project activities, and operate throughout the Project implementation	MoH, Directorate of Environmental and Occupational Health Western Province PDHS and Gampaha RDHS Sri Lanka Thriposha Limited
3.2	<p><b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b></p> <p>Incorporate resource efficiency and pollution prevention and management measures in the ESMP/ESMF to be prepared under action 1.2 above. The project will finance a rice grinder and related equipment to set up a new production line for rice based Thriposha.</p> <p>a) Adopt guidelines for energy and water consumption and noise pollution prevention methods within the Thriposha Factory</p>	Establishment and operate guidelines for energy, water savings methods and noise pollution prevention methods within the Factory before initiating project activities. Implement throughout Project implementation.	MoH, Directorate of Environmental and Occupational Health Sri Lanka Thriposha Limited
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
	<p><b>COMMUNITY HEALTH AND SAFETY</b></p> <p>Assess and manage specific risks and impacts to the community arising from Project activities , including, inter alia, community exposure to communicable diseases, fire</p>	Adopt health and safety measures starting from Project commencement, and throughout Project implementation.	MoH, RDHS & PDHS of relevant project districts

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	<p>hazards from flammable gasses and reagents (e.g. oxygen), and emergencies from national disasters.</p> <p><b>SEA AND SH RISKS</b></p> <p>As Government and Health Workers, Thriposha Factory Workers, Civil Society Organizations and Consultancy Firms will be engaged with the project beneficiaries adopt and implement a SEA/SH risk mitigation measure, as part of the ESMF, to assess and manage the risks of SEA and SH.</p>	Adopt SEA/SH risk mitigation measures starting from Project commencement, and throughout Project implementation.	
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
	This standard is not relevant for the Project.		
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
	This standard is not relevant for the Project.		
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	<p>Relevant aspects of this standard shall be considered, as needed, under action 10.1 and 10.2 above in terms of engaging the Veddha community in activities of Mother Support Groups, and Multisectoral Nutrition Coordination Committees, through meaningful participation and consultation in a culturally appropriate manner, and ensuring accessible mechanisms by which they can raise concerns or seek redress.</p>	Implement measures from Project commencement, and thereafter throughout Project implementation.	MoH
<b>ESS 8: CULTURAL HERITAGE</b>			
	This standard is not relevant for the Project.		
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
	This standard is not relevant for the Project.		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b></p> <p>Adopt and implement a Stakeholder Engagement activity for the Project, 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>To this end, ensure that the following measures are carried out:</p>	Implement measures from Project commencement, and thereafter throughout Project implementation.	MoH

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<ul style="list-style-type: none"> <li>a) Identify project stakeholders &amp; their needs and interests, build, and maintain constructive relationship with them in a systemic manner. This includes, engagement with a) affected parties who are the beneficiaries of the project such as pregnant and lactating mothers including children under five years , b) interest groups such as Civil Society Organizations including Community Based Organizations including other government departments/agencies and c) vulnerable groups such as women headed households, people with disabilities and those with chronic illnesses.</li>   <li>b) Ensure availability of specialized services to support vulnerable groups to effectively participate in consultation and information disclosure sessions. Consider the literacy levels of women while developing communications materials; consider provisions for childcare, transport, and safety for any in-person community engagement activities.</li>   <li>c) Strengthen capacities of Multisectoral Nutrition Coordination Committees and Mother Support Groups to improve citizens engagement mechanisms, information disclosure and grievance handling mechanisms of the project.</li>   <li>d) Ensure project information including project objectives, targeting criteria, beneficiary selection processes, beneficiary lists, project activities, benefits and services, environmental and social risks and impacts are disclosed to stakeholders in a timely, transparent, culturally appropriate format, in relevant local language, understandable, and in an accessible manner that enables meaningful consultations with stakeholders.</li>   <li>e) Conduct regular consultations through with stakeholders to gather community views and feedback such about the project, implementation and environmental and social performance and provide responses &amp; take necessary actions in response to the feedback received. Use focus groups discussions, surveys, and studies to obtain regular community feedback and monitor outcomes of stakeholder engagement activities.</li>   <li>f) Conduct monitoring of stakeholder engagement activities, maintain records, minutes and participant lists of consultations conducted, and ensure reporting to stakeholders and disclosure of consultation findings including project responses.</li> </ul>		

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10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></p> <p>Establish, publicize, maintain, operate and monitor an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the project activities; and promptly and effectively, in a transparent manner respond to grievances that is culturally appropriate. Ensure the Grievance Mechanism is 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 be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	<p>Establish the grievance mechanism from Project commencement, and thereafter maintain and operate the mechanism throughout Project implementation.</p>	<p>MoH</p>
<b>CAPACITY SUPPORT</b>			
CS1	<p>Trainings will be organized in the following areas for PMU including other project focal points:</p> <ul style="list-style-type: none"> <li>- Introduction to ESF and its requirements</li> <li>- Stakeholder Engagement</li> <li>- Occupational and community health &amp; safety</li> <li>- Labor management procedures</li> <li>- SEA/SH prevention measures</li> <li>- Emergency preparedness and response</li> <li>- Citizen Engagement and GRM implementation</li> </ul>	<p>Within one month of having Project Staff in place.</p>	<p>MoH, Directorate of Environmental and Occupational Health</p>