

**Republic of Malawi
Ministry of Health**

**Malawi Health Emergency Preparedness, Response, and Resilience
Project Using the Multiphase Programmatic Approach (MPA) –
P505187 Additional Financing**

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

June 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Malawi (the Recipient) is implementing the Malawi Health Emergency Preparedness, Response and Resilience Project using the Multiphase Programmatic Approach (the Project), through the Ministry of Health and Sanitation (MoHS), with the involvement of relevant ministries and agencies, including the Ministry of Gender, Community Development and Social Welfare, and the Ministry of Finance, Economic Planning and Decentralization, as set out in the Financing Agreement and Additional Financing Agreement. The International Development Association (the Association) has agreed to provide financing and additional financing for the Project. This ESCP supersedes previous versions of the ESCP for the Project and shall apply to both the original financing and the additional financing for the Project.
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 Association. The ESCP is a part of the Financing Agreement (International Development Association), Grant Agreement (Global Financing Facility) and Additional Financing (Pandemic Fund) Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreements.
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 respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social documents that shall be prepared, adopted, updated, consulted upon, disclosed and implemented under the Project, consistent with the ESSs, and in form and substance acceptable to the Association.
4. Once adopted, the environmental and social documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred agreements, the Recipient shall ensure that sufficient funds are available to cover the costs of implementing the ESCP. As agreed by the Association and the Recipient, this ESCP may be revised from time to time, if necessary, to reflect adaptive management of Project changes, unforeseen circumstances or Project performance. In such circumstances, the Association and the Recipient, through the Ministry of Health, shall update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's Representative specified in the agreements. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
MONITORING AND REPORTING			
A	REGULAR REPORTING Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including, inter alia, implementation of this ESCP; preparation, disclosure and implementation of the E&S instruments required under this ESCP; stakeholder engagement activities; functioning of the grievance mechanism(s), including SEA/SH survivor-centered referral arrangements; contractor and supervising firm ESHS performance; implementation of site-specific ESIA, ESMPs, C-ESMPs, IPCWMPs, LMP, SEP and SEA/SH measures; and status of corrective actions.	Submit quarterly reports to the Association throughout Project implementation. Submit each report to the Association no later than 15 days after the end of each reporting period.	Ministry of Health and Sanitation PIT
B	INCIDENTS AND ACCIDENTS Promptly notify the Association of any incident or accident related to the Project that has, or is likely to have, a significant adverse effect on the environment, affected communities, the public or workers, including, inter alia, fatalities, serious or multiple injuries, serious traffic accidents, significant pollution incidents, community exposure to hazardous healthcare or laboratory waste, security incidents, and cases of sexual exploitation and abuse (SEA) or sexual harassment (SH). Provide sufficient detail regarding the scope, severity and possible causes of the incident or accident, indicating immediate measures taken or planned to address it, and any information provided by any contractor and/or supervising firm, as appropriate. Subsequently, at the Association's request, prepare a report on the incident or accident and propose measures to address it and prevent and/or minimize its recurrence.	Notify the Association no later than 48 hours after learning of the incident or accident. Provide subsequent reports to the Association within a timeframe acceptable to the Association.	Ministry of Health and Sanitation PIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
C	CONTRACTOR'S MONTHLY REPORTS Require contractors and supervising firms to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts, including implementation of C-ESMPs, OHS measures, labor management requirements, SEA/SH Codes of Conduct, waste management, traffic and community health and safety measures, grievance management, and corrective actions. Submit such reports to the Association upon request and summarize contractor performance in the regular ESHS reports under Action A.	Submit monthly reports to the PIU throughout the contract period, and to the Association upon request.	Ministry of Health and Sanitation PIT
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ORGANIZATIONAL STRUCTURE The Ministry of Health shall establish and maintain a Project Implementation Team/Unit with qualified staff and resources to support management of ESHS risks and impacts of the Project, including an Environmental and Social Specialist responsible for environmental and social risk management. The Ministry of Health shall maintain adequate arrangements for E&S supervision of civil works, contractor oversight, reporting, stakeholder engagement, grievance management, and capacity building throughout Project implementation.	Maintain the Project Implementation Team/Unit and an Environmental and Social Specialist throughout Project implementation. Strengthen E&S supervision arrangements prior to commencement of civil works and maintain them throughout implementation.	Ministry of Health and Sanitation PIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.2	ENVIRONMENTAL AND SOCIAL INSTRUMENTS 1. Update, adopt, disclose and implement the Project Environmental and Social Management Plan (ESMP), Labor Management Procedures (LMP), Stakeholder Engagement Plan (SEP), Infection Prevention and Control and Waste Management Plan (IPCWMP), and Occupational Health and Safety measures, consistent with the ESSs, the Environmental, Health and Safety Guidelines (EHSGs), and Good International Industry Practice (GIIP), and in form and substance acceptable to the Association. 2. Prepare, consult upon, disclose, adopt and implement site-specific Environmental and Social Impact Assessments (ESIAs) and corresponding Environmental and Social Management Plans (ESMPs) for the National Reference Laboratory block in Lilongwe and the climate-resilient hospital block in Chikwawa, prior to commencement of the respective civil works. 3. For completion of outstanding snag list and unfinished civil works in Zomba and Blantyre, continue to implement the existing ESIAs, ESMPs and contractor ESMPs, and update them if required by the Association to reflect any change in scope, footprint, risks or implementation arrangements. 4. Incorporate the relevant aspects of this ESCP and the E&S instruments, including ESS2 requirements and C-ESMP obligations, into ESHS specifications of procurement documents and contracts with contractors and supervising firms. Thereafter ensure that contractors and supervising firms comply with the ESHS specifications of their respective contracts.	Update, adopt and disclose the Project E&S instruments prior to commencement of activities to which they relate, and thereafter implement them throughout Project implementation. Prepare, adopt and disclose site-specific ESIAs and ESMPs for the National Reference Laboratory block in Lilongwe and the climate-resilient hospital block in Chikwawa prior to commencement of the respective civil works. Require C-ESMPs to be prepared and approved prior to contractor mobilization and commencement of civil works and thereafter implemented throughout the contract period.	Ministry of Health and Sanitation PIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.3	MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of this ESCP, the E&S instruments, the Labor Management Procedures, Codes of Conduct with SEA/SH provisions, OHS requirements, waste management requirements, traffic and community health and safety measures, chance finds procedures, grievance arrangements, and reporting requirements into the ESHS specifications of procurement documents and contracts with contractors and supervising firms. Ensure that contractors and supervising firms, and their subcontractors, comply with the ESHS specifications of their respective contracts, prepare and implement approved C-ESMPs, maintain adequate ESHS staffing and budgets, conduct worker induction and training, and implement corrective actions within agreed timeframes.	As part of preparation of procurement documents and respective contracts. Approve C-ESMPs prior to contractor mobilization and commencement of civil works. Supervise contractors throughout Project implementation.	Ministry of Health and Sanitation PIT
1.4	TECHNICAL ASSISTANCE Ensure that consultancies, studies, feasibility assessments, designs, Bills of Quantities, capacity building, training, and any other technical assistance activities under the Project are carried out under terms of reference acceptable to the Association and consistent with the ESSs. Ensure that the outputs of such activities incorporate E&S considerations, including screening and exclusion criteria, pollution prevention, OHS, community health and safety, stakeholder engagement, data privacy and ethical use of patient-level information, and any downstream E&S risk management requirements, as relevant.	Throughout Project implementation.	Ministry of Health and Sanitation PIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
1.5	CONTINGENT EMERGENCY RESPONSE FINANCING a) Ensure that the CERC Manual includes a description of the ESHS assessment and management arrangements for implementation of the CERC Component, in accordance with the ESSs and in form and substance acceptable to the Association. b) Prepare, adopt, disclose and implement any E&S instruments required for activities under the CERC Component, in accordance with the CERC Manual and the ESSs, and thereafter implement the measures and actions required under said E&S instruments within the timeframes specified in the instruments.	a) Adopt the CERC Manual and, if applicable, related E&S instruments, in form and substance acceptable to the Association, as a condition for withdrawal under the CERC Component. b) Adopt any required E&S instrument before carrying out the relevant CERC activities and thereafter implement the instrument throughout implementation of such activities.	Ministry of Health and Sanitation PIT
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Update, adopt and implement the Labor Management Procedures (LMP) for the Project, consistent with ESS2, to address direct workers, contracted workers, primary supply workers, and supervising firms, as relevant. The LMP shall include, inter alia, provisions on working conditions, terms of employment, fair and transparent recruitment, non-discrimination and equal opportunity, management of worker relationships, occupational health and safety, emergency preparedness and response, personal protective equipment, prevention of forced labor and child labor, Codes of Conduct including SEA/SH provisions, worker accommodation where applicable, labor influx management, contractor and subcontractor requirements, and grievance arrangements for Project workers. Integrate OHS measures in the E&S instruments, procurement documents and contracts, including measures applicable to construction activities, healthcare facilities, laboratories, radiology equipment, infectious and hazardous waste management, and emergency response.	Update and adopt the LMP prior to commencement of civil works and thereafter implement it throughout Project implementation. Include LMP requirements in procurement documents and contracts prior to issuance of bidding documents and signing of contracts.	Ministry of Health and Sanitation PIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish, maintain and operate a grievance mechanism for Project workers, including direct workers, contracted workers, subcontracted workers and supervising firm personnel, as described in the LMP and consistent with ESS2. Ensure that the worker grievance mechanism is accessible, confidential, responsive, includes procedures for SEA/SH-related complaints, and is available before workers are engaged.	Establish or update the worker grievance mechanism before engaging Project workers and before commencement of activities with contractors and thereafter maintain and operate it throughout Project implementation.	Ministry of Health and Sanitation PIT
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Update, adopt and implement the Infection Prevention and Control and Waste Management Plan (IPCWMP) and site-specific waste management measures to ensure safe segregation, handling, storage, transportation, treatment and disposal of healthcare, laboratory, infectious, hazardous, non-hazardous, construction, asbestos-containing, chemical and e-waste streams, consistent with national requirements, the ESSs, EHSs and GIIP. Require contractors to adopt and implement construction waste management measures, hazardous materials procedures, spill prevention and response measures, and site restoration measures as part of their C-ESMPs.	Update and adopt the IPCWMP prior to commencement of activities that generate healthcare, laboratory or hazardous waste, and thereafter implement it throughout Project implementation. Require site-specific waste management measures and contractor waste management procedures prior to commencement of civil works.	Ministry of Health and Sanitation PIT
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate and implement resource efficiency and pollution prevention and management measures in the ESIs, ESMPs, C-ESMPs and IPCWMPs prepared under Action 1.2. These measures shall include, as relevant, construction waste management, dust and noise control, wastewater and laboratory effluent management, safe handling of hazardous materials, asbestos management procedures, e-waste management, pollution prevention for air, water and soil, and energy and water efficiency measures, including climate-resilient and resource-efficient design features for new infrastructure.	Adopt and implement measures in the same timeframe as the relevant ESIs, ESMPs, C-ESMPs and IPCWMPs, and thereafter implement them throughout Project implementation.	Ministry of Health and Sanitation PIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to communities, patients, facility users and nearby populations arising from Project activities, and include mitigation measures in the ESIA's, ESMPs, C-ESMPs and IPCWMPs prepared under Action 1.2. Measures shall include, inter alia, safe access management within operational health facilities, dust and noise control, traffic and road safety measures, signage, fencing and security of work sites, management of construction risks in active service environments, prevention of community exposure to medical, laboratory, hazardous and e-waste, emergency preparedness and response, public health measures, and community awareness consistent with the SEP.	Adopt and implement community health and safety measures in the same timeframe as the relevant ESIA's, ESMPs, C-ESMPs and IPCWMPs, and thereafter implement them throughout Project implementation.	Ministry of Health and Sanitation PIT
4.2	SEA AND SH RISKS Adopt and implement a SEA/SH Action Plan as part of the Project E&S instruments to assess, prevent and manage SEA/SH risks commensurate with the Project's Moderate SEA/SH risk rating. Require contractors, subcontractors and supervising firms to implement Codes of Conduct, worker training, community awareness, confidential reporting arrangements, and survivor-centered referral pathways. Ensure that site-specific ESMPs and C-ESMPs include SEA/SH prevention and response measures appropriate to the civil works sites and worker-community interactions. The grievance mechanism shall be equipped to receive, register and facilitate the resolution of SEA/SH complaints, including referral of survivors to relevant gender-based violence service providers, in a safe, confidential and survivor-centered manner.	Update and adopt the SEA/SH Action Plan prior to commencement of civil works and thereafter implement it throughout Project implementation. Establish and maintain SEA/SH-responsive grievance arrangements before commencement of civil works and throughout Project implementation.	Ministry of Health and Sanitation PIT
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
ESS 5 is not currently relevant to the Project, as the civil works under the Additional Financing will be undertaken within existing government owned health facility premises and are not expected to involve land acquisition, restrictions on land use, physical displacement or economic displacement. The Recipient shall screen all activities to confirm that no land acquisition, restrictions on land use or involuntary resettlement will occur. If any activity would require land acquisition, restrictions on land use or involuntary resettlement, the activity shall not proceed unless the ESCP is updated and appropriate instruments are prepared, adopted and implemented in accordance with ESS5 and in form and substance acceptable to the Association.		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES		
BIODIVERSITY RISKS AND IMPACTS Assess and manage any site-specific biodiversity and natural resource risks in the ESIAs and ESMPs prepared under Action 1.2, including screening for proximity to sensitive receptors, management of vegetation clearance within facility boundaries, runoff control, waste disposal, and pollution prevention measures. The Project shall not finance activities that would adversely affect critical habitats or ecosystem services. Biodiversity management measures or Biodiversity Management Plans shall be prepared and implemented if required by the site-specific assessment and acceptable to the Association.	Adopt biodiversity and natural resource management measures in the same timeframe as the relevant ESIAs and ESMPs and thereafter implement them throughout Project implementation.	Ministry of Health and Sanitation PIT
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES		
ESS7 is not considered relevant to this project as there are no distinct social and cultural groups in the project area that exhibit characteristics of indigenous or traditionally underserved communities as spelled out under this standard.		
ESS 8: CULTURAL HERITAGE		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
CULTURAL HERITAGE AND CHANCE FINDS PROCEDURE The Recipient shall ensure that all site-specific Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs), Contractor ESMPs, and civil works contracts include chance finds procedures, consistent with ESS8, national legislation, Good International Industry Practice, and in form and substance acceptable to the Association. The Recipient shall ensure that any chance finds or unexpected cultural heritage discoveries are immediately reported, secured, assessed, managed, and preserved in accordance with the approved procedures and applicable national legal requirements.		Prior to commencement of civil works and thereafter throughout implementation of the relevant civil works.	Ministry of Health and Sanitation PIT
ESS 9: FINANCIAL INTERMEDIARIES			
ESS 9 is not currently relevant to the project.			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Update, disclose, consult upon and implement the Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10. The SEP shall include measures to provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner that is free of manipulation, interference, coercion, discrimination and intimidation. The SEP shall reflect the expanded scope of the Additional Financing, including targeted engagement with communities surrounding civil works sites in Lilongwe, Chikwawa, Zomba and Blantyre, health workers, facility users, vulnerable and marginalized groups, and other interested parties. The SEP shall include feedback mechanisms, documentation requirements, and measures to address exclusion, misinformation and temporary disruption of services during construction.	Update, disclose and consult upon the SEP prior to commencement of civil works, and thereafter implement it throughout Project implementation.	Ministry of Health and Sanitation PIT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
10.2	PROJECT GRIEVANCE MECHANISM Maintain and operate an accessible grievance mechanism to receive and facilitate the resolution of concerns and grievances concerning the Project, promptly and effectively, in a transparent, culturally appropriate and readily accessible manner, at no cost and without retribution, including anonymous complaints and complaints from vulnerable groups. Strengthen the grievance mechanism to cover the expanded scope of the Additional Financing and civil works sites, including procedures for intake, referral and resolution of SEA/SH complaints in a safe, confidential and survivor-centered manner.	Maintain and operate the grievance mechanism throughout Project implementation. Strengthen and disclose site-level grievance arrangements prior to commencement of civil works.	Ministry of Health and Sanitation PIT
CAPACITY SUPPORT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY/AUTHORITY
CS1	Training shall be undertaken for PIT staff, relevant Ministry of Health and Sanitation staff, health facility personnel, contractors, subcontractors and supervising firms, as applicable, on: - World Bank ESF requirements and implementation of this ESCP; - Preparation and implementation of ESIAS, ESMPS, C-ESMPS, IPCWMPS, LMP and SEP; - Occupational health and safety, including construction OHS, healthcare OHS, emergency preparedness and response, and use of personal protective equipment; - Healthcare, laboratory, hazardous, construction, asbestos-containing and e-waste management, including transport, handling, storage, disposal and spill response; - Community health and safety, traffic management and safe construction in operational health facilities; - Stakeholder engagement, inclusion of vulnerable groups, information disclosure and grievance management; - SEA/SH prevention and response, Codes of Conduct, survivor-centered referral pathways and SEA/SH grievance management; - Data privacy, confidentiality and ethical use of patient-level information in digital health and surveillance systems; - Chance finds procedures and cultural heritage requirements; and - Contractor management, ESHS reporting, supervision and corrective action tracking.	Provide initial training prior to commencement of civil work and thereafter at least annually, and as needed when new contractors, supervising firms or relevant staff are engaged. Provide refresher training periodically throughout Project implementation.	Ministry of Health and Sanitation PIT
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness:			

- I. Environmental and Social Assessment: Prior to the commencement of any civil works, the Borrower shall prepare and submit for the Bank's review and clearance Environmental and Social Impact Assessments (ESIAs), including associated management plans, for the proposed Chikwawa District Hospital and the PHIM Laboratory Block. The ESIAs shall be consulted upon and disclosed in accordance with the requirements of ESS1 and in a manner acceptable to the Bank before the start of any construction activities.
- II. Land Ownership and Site Availability: Prior to the commencement of any civil works, the Borrower shall provide evidence, in form and substance satisfactory to the Bank, demonstrating legal ownership and/or security of tenure of the proposed project sites. Such evidence shall include: (i) confirmation of government ownership or legally secured rights to the land; (ii) confirmation that the sites are free from encumbrances, disputes, and third-party claims or rights; and (iii) documentation confirming that the sites are not subject to current occupation, use, or livelihood activities by any individuals, communities, or other stakeholders that would trigger land acquisition, displacement, or restrictions on land use under ESS5.