

REPUBLIC OF THE GAMBIA

**Ministry of Environment, Climate Change and
Natural Resources**

**West Africa Coastal Areas (WACA) Resilience Investment
Project 2 (WACA ResIP2)
(P175525)**

Draft for Negotiations

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

September 2022

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of The Gambia (the Recipient) will implement the West Africa Coastal Areas Resilience Investment Project II (WACA ResIP II-P175525) (the Project), through the Central Project Coordination Unit of the Ministry of Environment, Climate Change and Natural Resources with the involvement of the Ministry of Finance and Economic Affairs, the Ministry of Regional Governments and Lands, the Ministry of Agriculture, Ministry of Water Resources and Fisheries, and the National Disaster Management Agency, as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide 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 Association. The ESCP is a part of the Financing 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 Association. Once adopted, the E&S instruments may be revised from time to time with prior written agreement by the Association.
4. As agreed by the Association 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 the Ministry of Environment, Climate Change and Natural Resources and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Permanent Secretary, Ministry of Environment, Climate Change and Natural Resources. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association 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&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s) including those related to GBV/SEA/ SH and Project workers, and the SEA/SH Prevention and Response Action Plan.</p>	<p>Submit quarterly reports to the Association throughout Project implementation, commencing no later than three months after the Effective Date. Submit each report to the Association no later than 10 days after the end of each reporting period.</p>	<p>Central Project Coordination Unit (CPCU)</p>
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association 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, conflicts related to land and natural resources use changes/restrictions, labour influx). 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 Association'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 Association no later than 48 hours after learning of the incident or accident and no later than 24 hours for severe incidents/accidents, including fatalities and SEA/SH allegations.</p> <p>Provide subsequent report to the Association within seven (7) days following the incident or accident, unless a different timeframe is agreed with the Association.</p>	<p>CPCU Supervising engineers Contractors and subcontractors</p>
C	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>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 and submit such reports to the Association.</p>	<p>Submit the monthly reports to the Association. <i>Throughout the implementation of the Project</i></p>	<ul style="list-style-type: none"> • <i>CPCU Supervising engineers</i> • <i>Contractors and subcontractors</i> • <i>Suppliers</i> • <i>Other Service providers</i>
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Establish, and maintain within a CPCU with qualified staff and resources to support management of ESHS risks and impacts of the Project including one environmental specialist will proven skills in Occupational Health and Safety (OHS) aspects, one social development specialist, whose tasks will include gender considerations SEA/SH, , a communication specialist to support management of ESHS risks and impacts of the project, whose qualifications shall be submitted to the Association for No objection.</p>	Establish and maintain a PIU as set out in the financing agreement. The environmental specialist and the social development specialist, and a communications specialist shall be hired no later than three (3) months after Project Effective Date and thereafter maintained throughout Project implementation.	CPCU
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <p>1. Adopt and implement Environmental and Social Impact Assessments (ESIA), and corresponding Environmental and Social Management Plans (ESMP, as set out in the ESMF and consistent with the relevant ESSs).</p> <p>2. Adopt and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p>	<p>1. Prepare, disclose, consult upon, and adopt the ESIA and ESMPs prior to the launching of the bidding process for respective subproject/project activity, and thereafter implement the ESIA and ESMP throughout Project implementation.</p> <p>2. The ESMF was prepared consulted upon and will be disclosed prior to Appraisal, and thereafter implement the ESMF throughout Project implementation.</p>	CPCU
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p>	As part of the preparation of procurement documents and respective contracts, supervise contractors throughout Project implementation.	<ul style="list-style-type: none"> • CPCU <i>Supervising engineers Contractors, subcontractors</i>
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies, technical assistance on legislation and guidelines (such as coastal management regulations/guidelines and planned relocation guidelines) capacity building, training, and any other technical assistance activities under the Project, including, inter alia, the Environmental and Social</p>	Throughout Project implementation.	CPCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Impact Assessment, the Resettlement Action Plan are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.		
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health, and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.	The LMP was prepared consulted upon and will be disclosed prior to Appraisal, and thereafter implement the LMP throughout Project implementation].	<ul style="list-style-type: none"> • CPCU Contractors • Subcontractors
2.2	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Establish grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.	<ul style="list-style-type: none"> • CPCU Contractors • Subcontractors
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Adopt and implement a Waste Management Plan (WMP), to manage hazardous and non-hazardous wastes, consistent with ESS3.	Adopt the WMP as part of the specific instruments (ESIAs/ESMPs) and contractors ESMP, and thereafter implement the WMP throughout Project implementation.	<ul style="list-style-type: none"> • CPCU Contractors • Subcontractors
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESMF/ESMP to be prepared under action 1.2 above.	Same timeframe as for the adoption and implementation of the ESMF and ESMP	<ul style="list-style-type: none"> • CPCU Contractors • Subcontractors
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the ESMP to be prepared under action 1.2 above, as well as C-ESMPs	Same timeframe as for the adoption and implementation of the ESMP and C-ESMP.	<ul style="list-style-type: none"> • CPCU Contractors • Subcontractors
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers, risks of labor influx, response to emergency situations, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.	Same timeframe as for the adoption and implementation of the ESMF and ESMPs.	CPCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.3	SEXUAL EXPLOITATION ABUSE, AND SEXUAL HARASSMENT Develop and adopt a SEA/SH Prevention and Response Action Plan with corresponding budget as part of the ESMP to assess and manage the risks of SEA and SH.	Adopt the SEA/SH Action Plan as part of the ESMF during 1st year of implementation and thereafter implement the SEA/SH Action Plan throughout Project implementation.	CPCU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	RESETTLEMENT POLICY FRAMEWORK Prepare, consult upon, disclose, adopt and thereafter implement a Resettlement Policy Framework (RPF) for the Project to guide the preparation of the eventual Resettlement Plans (RAP), consistent with ESS5 and national laws.	RPF was prepared consulted upon and will be disclosed prior to Appraisal, and thereafter implement the RPF throughout Project implementation.	CPCU
5.2	RESETTLEMENT PLANS Adopt and implement a resettlement action plan (RAP) for each activity under the Project for which the RPF requires such RAP, as set out in the RPF, and consistent with ESS5.	Adopt and implement the respective RAP, including ensuring that before taking possession of the land and related assets, full compensation has been provided and displaced people have been resettled and moving allowances have been provided.	CPCU
5.3	GRIEVANCE MECHANISM The grievance mechanism (GM) to address resettlement related complaints are as adapted from project-level GM described in the SEP, and reflected in the RPF and RAPs.	The Grievance Mechanism (GM) shall be operational before start of the resettlement activities.	CPCU
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Implement the biodiversity management measures set out in the Environmental and Social Management Framework (ESMF) and the work site specific E&S instruments (ESIA/ESMP) in accordance with ESS6.	Same timeline as for the preparation of the ESMF/ESIAs/ESMPs and thereafter implement them throughout Project implementation.	CPCU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES Standard not relevant at this stage			
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Adopt and implement a Cultural Heritage Management measures as part of the ESMF/ESIA/ESMP, consistent with ESS8.	Same timeline as for the preparation of the ESMF/ESIA/ESMP. Implement the procedures throughout Project implementation].	CPCU
8.2	CHANCE FINDS Describe and implement the chance finds procedures as part of the ESMF of the Project	Describe the chance find procedures in the ESMF. Implement the procedures throughout Project implementation].	CPCU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 9: FINANCIAL INTERMEDIARIES- Standard not relevant			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</p> <p>Adopt and implement a Stakeholder Engagement Plan (SEP) 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>	The SEP was prepared consulted upon, and will be disclosed prior to Appraisal, and thereafter implement the SEP throughout Project implementation.	CPCU
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, 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 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>	Establish the grievance mechanism no later than three (3) months after Project Effective Date, and thereafter maintain and operate the mechanism throughout Project implementation.	CPCU
CAPACITY SUPPORT			
CS1	<p>Training to be provided</p> <p>Target Group: PIU, implementing partners at central and local level department agents</p> <p>Topics:</p> <ul style="list-style-type: none"> -The World Bank Environmental and Social Framework (ESF) -Gambian laws relating to social and environmental protection -Identification and engagement of stakeholders -Labor Management Procedures including workers GM -Occupational Health and Safety, including risks related to use of security personnel, COVID-19 -Grievance Mechanism including filing and processing of grievances -SEA/SH/ Violence against children (VAC) risk awareness; SEA/SH Prevention and Response Action Plan, including CoCs 	From year 1 after Effectiveness Date and at regular intervals during project implementation	CPCU Consultants with support of the Bank specialists

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
CS2	<p>Target group: Workers on the site,</p> <p>Topics:</p> <ul style="list-style-type: none"> -Occupational Health and Safety, including on the prevention of emergencies, and how to prepare for and respond to such situations, including Risks related to use of security personnel, COVID-19; STDs and HIV/AIDS -Solid and liquid waste management -Safety and security of the community, including road safety - Labor Management Procedures including workers GM - Risks of SEA/SH awareness, SEA/SH Prevention and Response Action Plan and the codes of conduct 	Prior to work on site and regular intervals during implementation	CPCU <i>Consultants with support of the Bank specialists</i>
C3	<p>Target group: The beneficiaries/local communities/ authorities/ NGO</p> <p>Topics:</p> <ul style="list-style-type: none"> - GM-registration and processing procedure - Risks of SEA/SH awareness, SEA/SH Prevention and Response Action Plan and the codes of conduct - Safety and security of the community including road safety, prevention of the spread of COVID-19, STD &STI -Engagement of community labor 	During project implementation	CPCU <i>Consultants with support of the Bank specialists</i>
C4	<p>Target group: Suppliers/Contractors/Sub-contractors</p> <p>Topic:</p> <ul style="list-style-type: none"> --Occupational Health and Safety, including on the prevention of emergencies, and how to prepare for and respond to such situations, including risks related to the use of security personnel, COVID-19; STDs and HIV/AIDS -Labor Management Procedures including workers GM -SEA/SH Grievance Redress Mechanism Module -Grievance registration and processing procedure -Workers Grievance Mechanism -Incident Reporting and implementation of corrective measures -Waste management 	During project implementation	CPCU <i>Contractors, consultants, with support of the Bank specialists Consultants</i>