

REPUBLIC OF THE GAMBIA



Ministry of Finance and Economic Affairs

The Gambia Infrastructure Project (P504762)

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

Appraisal

March 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of The Gambia (hereinafter "the Recipient") is planning to implement The Gambia Infrastructure Project (P504762) (hereinafter "the Project") with the involvement of the Central Project Coordination Unit (CPCU) under the Ministry of Finance and Economic Affairs (MOFEA) and the following ministries and departments: the Ministry of Transport, Works and Infrastructure (MOTWI), the Ministry of Petroleum and Energy (MOPE), the Gambia National Road Authority (NRA), the Public Utility Regulatory Authority (PURA), the National Water and Electricity Company (NAWEC) and The Gambia Transport Service Company. The International Development Association (hereinafter the Association) has agreed to provide financing for the Project, as set out in the Agreement.
2. The Republic of The Gambia 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 Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Republic of The Gambia shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreement, the Republic of The Gambia shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Republic of The Gambia, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Republic of The Gambia agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Permanent Secretary of the Ministry of Finance and Economic Affairs. The Republic of The Gambia 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
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>a. Maintain the Central Projects Coordinating Unit under the Ministry of Finance and Economic Affairs with qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project including one Environmental Safeguards Specialist and one Social Safeguards Specialist, already recruited and hire an additional Environment & Social Safeguards Assistant. NRA will recruit one environmental and social specialist NAWEC will maintain the environmental specialist and the social specialist already recruited</p> <p>b. Enter into collaboration arrangements with the National Environment Agency (NEA) to manage E&S risks and impacts of the Project.</p>	<p>a. Maintain the current CPCU's environmental specialist and social specialist positions and hire additional environmental and social safeguards assistant prior to Project Effective Date and thereafter maintain the CPCU and these positions throughout Project implementation. The NRA will recruit one E&S Specialist two months following the project's effectiveness and thereafter maintain the position throughout Project implementation. NAWEC will maintain these positions throughout Project implementation</p> <p>b. Finalize the Memorandum of Understanding (MoU) between the CPCU and NEA before the effective project date and maintain the MoU throughout the project implementation.</p>	<p>Ministry of Finance and Economic Affairs (MoFEA) / Central Project Coordination Unit (CPCU)</p> <p>CPCU / NRA / NAWEC</p> <p>(CPCU)</p>
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement the following capacity building measures:</p> <p>All capacity-building activities and training shall be laid out in a plan embedded in the ESMF. Training shall be provided to the CPCU, project workers and contractors to ensure that the Project is carried out in accordance with this ESCP. Trainings shall be prepared and delivered in accordance with the capacity building plan in the ESMF and the following:</p> <p>1. Target Group: CPCU, Implementing Entities (IEs) and National Agencies (NEA) at central and local level department agents</p> <p>Trainings topics:</p>	<p>Prepare a capacity building plan in the ESMF by project effective date.</p>	<p>CPCU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>Engagement Plan.</p> <ul style="list-style-type: none"> Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports. Number and status of resolution of incidents and accidents reported under action E below. Status of implementation of the MoU between CPCU and NEA 		
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>	Submit the monthly reports to the Association upon request to be submitted under action C above.	CPCU, Supervising engineers, Contractors and subcontractors
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Association of any incident or accident relating 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 those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.</p>	CPCU, Supervising engineers, Contractors and subcontractors
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS</p> <p>1. Prepare and implement an Environmental and Social Impact Assessment (ESA), and</p>	1. Prepare the ESIA and ESMP prior to launching of the bidding process for the	

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>corresponding Environmental and Social Management Plan (ESMP) for the Project, consistent with the relevant ESSs.</p> <p>2. Prepare and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p> <p>3. Require subproject entities to prepare and implement the site-specific Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP), as set out in the ESMF.</p>	<p>respective sites and thereafter implement the ESIA and ESMP throughout Project implementation.</p> <p>2. Advanced draft ESMF has been prepared and publicly disclosed on March 28. It will be finalized by negotiation and thereafter implemented throughout Project implementation.</p> <p>3. Prepare the ESMP and incorporate the ESMP as part of the respective bidding documents for the respective subprojects prior to the carrying out of subproject that requires the preparation of such ESMP. Once finalized, implement the respective ESMP throughout Project implementation.</p>	<p>CPCU</p>
<p>1.2 MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, specify relevant E&S assessments or plans, the Labor Management Procedures, and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors and supervision firms to the Association.</p>	<p>As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Association upon request.</p>	<p>CPCU</p>
<p>1.3 TECHNICAL ASSISTANCE</p>		

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	Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project, including, inter alia, specify the E&S or plans to be supported under the TA in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.	Throughout Project implementation.	CPCU
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	LABOR MANAGEMENT PROCEDURES Prepare and implement the Labor Management Procedures (LMP) for the Project.	The CPCU have prepared an advanced draft LMP that will be finalized and thereafter implemented throughout Project implementation.	CPCU
2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN Prepare and implement an OHS Management Plans for the road and the energy activities to assess and manage the OHS risks and impacts of the Project. AND Require contractors and subcontractors to prepare and implement OHS Management Measures in accordance with the OHS Management Plan	Prepare the OHS Management Plans for the road and energy activities same timeframe as for the preparation of the respective subproject ESMP and thereafter implement the plan throughout Project implementation.	CPCU / NAWEC / NRA
2.3	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	The worker grievance mechanism is established under the LMP and the SEP. Thereafter it will be operationalized 3 months after project effective date prior to engaging Project workers and maintained it throughout Project implementation.	CPCU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN		

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	Prepare and implement a Waste Management Plan (WMP), as part of the ESMP prepared for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS3.	Prepare the WMP as part of the specific instruments (ESIAs/ESMPs) and contractors ESMPs and thereafter implement the WMP throughout Project implementation.	CPCU
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESMP to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the ESMP	CPCU
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 1.1 above.	Same timeframe as for the preparation and implementation of the ESMP.	CPCU
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 prepared in accordance with the ESMF.	Same timeframe as for the preparation and implementation of the ESMPs.	CPCU
4.3	SEA AND SH RISKS Prepare and implement a SEA/SH Action Plan as part of the ESMP to assess and manage the risks of SEA and SH.	The SEA/SH Action Plan was prepared as part of the ESMF before project effectiveness 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 FRAMEWORK 1. Prepare and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5. 2. Prepare and implement a Resettlement Plan (RP) for each activity under the Project for such RP is required as set out in the RPF and consistent with ESS5.	1. The RPF was prepared, consulted and disclosed in the Country on March 28, 2025, the RPF will be implemented throughout Project implementation. 2. The CPCU will prepare and implement the respective RP or LRP prior to carrying out the relevant works,	CPCU

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		<p>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.</p> <p>3. The NRA will recruit one Environmental and Social Specialist by project's effectiveness.</p> <p>4. Hand on implantation support (HEIS) assistance will be available upon request by the Client to support the CPCU and implementing agencies in managing environmental and social risks, especially regarding land acquisition, community engagement, and social monitoring in workplaces.</p> <p>5. A Facilitation Firm will be appointed to implement resettlement through an inclusive approach.</p>	
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Prepare and implement a Biodiversity Management Plan (BMP) as part of the ESMP in accordance with the guidelines of the ESIA prepared for the Project, and consistent with ESS6.</p>	<p>Prepare the BMP Same timeframe as for the preparation and implementation of the ESMPs and thereafter implement the BMP throughout Project implementation.</p>	CPCU
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES: This standard is not relevant			
ESS 8: CULTURAL HERITAGE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
8.1	<p>CULTURAL HERITAGE RISKS AND IMPACTS</p> <p>Prepare and implement a Cultural Heritage Management Plan (CHMP) as part of the ESMP in accordance with the guidelines of the ESIA prepared for the Project and consistent with ESS8.</p>	Same timeframe as for the preparation and implementation of the ESMPs.	CPCU
8.2	<p>CHANCE FINDS</p> <p>Describe and implement the chance finds procedures as part of the ESMF of the Project.</p>	Describe the chance find procedures in the ESMF and Implement the procedures throughout Project implementation.	CPCU
ESS 9: FINANCIAL INTERMEDIARIES: This Standard is not relevant			
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN</p> <p>Update 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, disclosed, consulted upon, March 28, 2025. The SEP will be implemented throughout Project implementation. If needed the SEP will be updated.	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>	The CPCU has established the grievance mechanism that will be operationalized no later than three (3) months after project effective date and thereafter maintain and operate the mechanism throughout Project implementation.	CPCU
INDICATORS FOR IMPLEMENTATION READINESS			
<p>The following actions are indicators for implementation readiness:</p> <ul style="list-style-type: none"> ✓ Maintenance of E&S risk management unit in the CPCU, MoFEA with an Environmental Specialist and Social Specialist already recruited with planned additional hire of one E&S Assistant. 			

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<ul style="list-style-type: none"> ✓ Memorandums of Understanding: The CPCU is in the process of signing an MoU with the NEA to ensure proper coordination of E&S risk management activities. ✓ ESMF prepared duly consulted and disclosed by project effective date. - ESMP and other E&S risk management instruments prescribed by the project ESMF prepared, consulted and disclosed prior to start of subprojects/ activities. ✓ SEP prepared duly consulted and disclosed by project Appraisal. ✓ LMP prepared duly consulted and disclosed by project effective date. ✓ RPF prepared duly consulted and disclosed by project effective date. 		