

# Republic of The Gambia



## Digital Transformation for Africa/ Western Africa Regional Digital Integration Program – Series of Projects 1 (WARDIP) (P176932)

(Negotiated)

### ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN (ESCP)

October 17, 2023

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of The Gambia (the Recipient) shall implement the “Western Africa Regional Digital Integration Program – Series of Projects 1 (WARDIP) (P176932)” (the Project), with the involvement of the Ministry of Communications and Digital Economy (MoCDE), 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 said 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 MoCDE and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient’s designated official in MoCDE. 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 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&amp;S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s) including those related to the resettlement and cases of Sexual Exploitation and Abuse, Sexual Harassment (SEA/SH) and Violence against Children (VAC)</p>	<p>Submit quarterly reports based on project activities to the Association throughout Project implementation, starting with the Project Effective Date. Submit each report to the Association no later than 7 days after the end of each reporting period.</p>	<p>Project Implementation Unit (PIU)</p>
B	<p><b>INCIDENTS AND ACCIDENTS</b></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. The Recipient shall 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 sufficiently detailed report on the incident or accident and propose any measures taken or to be taken 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 within 24 hours for fatality and SEA/SH incidents.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association.</p> <p>This systematic notification system shall be in effect throughout the implementation of the Project.</p>	<p>PIU</p>
C	<p><b>CONTRACTORS' MONTHLY REPORTS</b></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, contracts and submit such reports to the Association.</p>	<p>Submit the monthly reports from the signing of the suppliers/contractor's contracts to the Association as annexes to the reports to be submitted under action A above.</p>	<p>PIU</p>
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>Establish and maintain a project implementation unit (PIU) with qualified staff and resources to support management of ESHS risks and impacts of the Project including one</p>	<p>The PIU is already established with the required qualified staff: one environmental specialist and one Social specialist as set out in the Financing</p>	<p>MoCDE and PIU</p>

	(1) environmental specialist and one (1) social specialist.	Agreement and thereafter maintain these positions throughout Project implementation.	
1.2	<p><b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <p>1. Adopt and implement an Environmental and Social Impact Assessment (ESIA), and corresponding Environmental and Social Management Plan (ESMP) for civil works for which the ESIA/ESMP is required, 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. Adopt the ESIA and ESMP prior to launching the bidding process, and thereafter implement the ESIA and ESMP throughout Project implementation.</p> <p>2. The ESMF was prepared consulted upon and disclosed in the country and on the Bank’s external website on July 24, 2023, and shall be implemented throughout Project implementation.</p>	MoCDE and PIU
1.3	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&amp;S instruments, the LMP, 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 including Occupational Health and Safety (OHS) measures.</p>	As part of the preparation of procurement documents and respective Tendering /Contracting contracts. Supervise contractors throughout Project implementation.	PIU
1.4	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the consultancies, studies (including technical feasibility studies, ), capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association and that are consistent with the ESSs. Thereafter, ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	PIU
1.5	<p><b>CONTINGENT [EMERGENCY] [EARLY] RESPONSE FINANCING</b></p> <p>a) Ensure that the CERC Operational Manual as specified in the legal agreement includes a description of the ESHS assessment and management arrangements including, if</p>	a) The adoption of the CERC manual In form and substance acceptable to the Association is a withdrawal condition	MoCDE

	<p>applicable, ESMF CERC Addendum that will be included or referred to in the CERC Manual for the implementation of CERC component in accordance with the ESSs.</p> <p>b) Adopt any environmental and social (E&amp;S) instruments which may be required for activities under CERC component of the Project, in accordance with the CERC Manual and, if applicable, ESMF CERC Addendum and the ESSs, and thereafter implement the measures and actions required under the said E&amp;S instruments, within the timeframes specified in said E&amp;S instruments.</p>	<p>under Section III.B of Schedule 2 to the Financing Agreement for the Project.</p> <p>b) Prepare, consult on, disclose, and adopt any required E&amp;S instrument and include it as part of the respective bidding process, if applicable, and in any case, before the carrying out of the relevant Project activities for which the E&amp;S instrument is required. Implement the E&amp;S instruments in accordance with their terms, throughout Project implementation.</p>	
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Prepare, consult on, disclose, adopt and implement the 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.</p>	<p>The LMP was prepared, consulted on and disclosed in the country on May 19, 2023, and on the WB website on May 22, 2023. The LMP shall thereafter be implemented throughout Project implementation.</p>	PIU
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish, maintain, and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	<p>Establish and maintain a grievance mechanism as part of the LMP prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.</p>	PIU Suppliers and Contractors
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>WASTE MANAGEMENT PLAN</b></p> <p>Prepare, consult on, disclose, adopt and implement a Waste Management Plan (WMP), required by the specific ESMP to be prepared under action 1.2 above, to manage hazardous and non-hazardous wastes, consistent with ESS3.</p>	<p>Prepare, consult on, disclose, adopt a WMP on the timeframe specified in 1.2 above for the ESIA/ESMP, and thereafter implement the WMP throughout Project implementation.</p>	PIU / Suppliers and/or service providers
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 to be prepared under action 1.2 above.</p>	<p>Same timeframe specified for the adoption and implementation of the ESMP in 1.2 above.</p>	PIU
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY</b></p>	<p>Same timeframe specified for the</p>	PIU

	Ensure that Project enterprises develop and implement traffic and road safety Plans, in particular a plan of routes for the passage of site machinery and equipment, as required in the ESIA/ESMP.	adoption and implementation of the ESMP in 1.2 above.	
4.2	<b>COMMUNITY HEALTH AND SAFETY</b> 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 specified for the adoption and implementation of the ESMPs in 1.2 above.	PIU
4.3	<b>SEA AND SH RISKS</b> Adopt and implement a SEA/SH Action Plan as part of the ESMF, to assess and manage the risks of SEA and SH.	Same timeframe as for the ESMF and thereafter implement the SEA/SH Action Plan throughout Project implementation.	MocDE and PIU
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<b>RESETTLEMENT POLICY FRAMEWORK</b>  Prepare, consult on, disclose, adopt and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.	The RPF was prepared, consulted and disclosed in the country on May 19, 2023, and on the WB website on May 22, 2023. The RPF shall thereafter be implemented throughout the Project implementation.	PIU
5.2	<b>RESETTLEMENT PLANS</b>  Prepare, consult on, disclose, 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.  All RAPs shall be approved by the Association and disseminated at the national level and on the Association's and Recipient's websites.	Prepare, consult on, disclose, adopt and implement respective RAP, including ensuring that before taking possession of the land and related assets, full compensation has been provided and, as applicable, displaced people have been resettled and moving allowances have been provided.	PIU
5.3	<b>GRIEVANCE MECHANISM</b>  The Grievance Mechanism (GM) linked to the land acquisition and involuntary resettlements is not different from the Grievance Mechanism included in the SEP.	<i>The GM shall be operational before start of the resettlement activities</i>	PIU
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<b>BIODIVERSITY RISKS AND IMPACTS</b>  Adopt and implement any measures to avoid adverse impacts on local biodiversity and	Same timeframe as for the adoption and implementation of the ESMPs and shall be maintained and managed	PIU

	<p>living natural resources through the application of a mitigation hierarchy and by optimizing the project's technical designs in this regard to the extent feasible, with specific measures to be outlined in the ESMP, and consistent with ESS6.</p> <p>Prepare a full assessment of risks and impacts in biodiversity, as well as a fine-scale map for turtle nesting including other habitats within at least 25 m depth, as part of the technical feasibility studies.</p>	<p>throughout Project implementation.</p> <p>Same timeframe as for the adoption of the technical feasibility studies prior to selection of routine of cable and location of landing site.</p>	
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES (NOT RELEVANT)</b>			
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<p><b>CULTURAL HERITAGE RISKS AND IMPACTS</b></p> <p>Address cultural heritage in the ESMF and highlight any issues that could be encountered.</p> <p>Adopt 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>	<p>Same timeframe as for the adoption and implementation of the ESMPs, and thereafter implement the CHMP throughout Project implementation.</p>	PIU
8.2	<p><b>CHANCE FINDS</b></p> <p>Describe and implement the chance finds procedures, as part of the ESMP of the Project.</p>	<p>Describe the chance find procedures in the ESMP. Implement the procedures throughout Project implementation.</p>	PIU
<b>ESS 9: FINANCIAL INTERMEDIARIES (NOT RELEVANT)</b>			
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<p><b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b></p> <p>Prepare, consult on, disclose, 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>	<p>The SEP was prepared, consulted on, and disclosed in the country and on the World Bank external website on August 8, 2023; and shall thereafter be implemented throughout Project implementation.</p>	PIU
10.2	<p><b>PROJECT GRIEVANCE MECHANISM</b></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</p>	<p><i>GM to be operational not later than three (3) months after Project's Effective Date and maintained throughout the implementation of the Project</i></p> <p><i>Communication plan shall be available no later than one month after the Project's Effective Date.</i></p>	PIU

	gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.		
<b>CAPACITY SUPPORT</b>			
CS1	<p>Organize and train PIU staff, stakeholders, communities, Project workers on:</p> <ul style="list-style-type: none"> <li>● stakeholder mapping and engagement</li> <li>● specific aspects of environmental and social assessment</li> <li>● emergency preparedness and response</li> <li>● community health and safety.</li> <li>● ESF Requirements</li> <li>● Roles and responsibilities for environmental and social issues</li> <li>● Occupational health and safety (including COVID-19 recommendation)</li> <li>● Labour requirements</li> <li>● Emergency prevention and preparedness and response arrangements to emergency situations</li> <li>● Managing GBV/SEA risks</li> <li>● Maintaining GRM and keeping GRM log</li> </ul> <p>Waste Management</p>	<p>Three (3) months after World Bank Board approval followed by a minimum one annual refresher training to:  <i>PIU, the Heads of the Project's components, namely: MoCDE, PURA, The University of The Gambia, Central Bank of The Gambia</i></p>	PIU
CS2	Regular training shall be provided for Project workers on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations.	<i>Workers on the site, companies/supervising entity (Prior to the works on the site)</i>	PIU