

THE REPUBLIC OF THE GAMBIA

Ministry of Finance and Economic Affairs
Gambia National Water and Electricity Company

Regional Solar Park of The Gambia (P504421)

Draft for Negotiation

ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)

June 26 2024

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of The Gambia (Recipient) will implement the Regional Solar Park of The Gambia Project (the Project), with the involvement of The Gambia National Water and Electricity Company (NAWEC), as set out in the Grant Agreement. The International Bank for Reconstruction and Development/ International Development Association (World Bank or the Bank), acting as administrator of the Energy Sector Management Assistance Program (ESMAP) Umbrella 2.0 Multi-Donor Trust Fund, has agreed to provide financing for the Project, as set out in the referred agreement(s).
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(s).
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 NAWEC, 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 through the Permanent Secretary, Ministry of Finance and Economic Affairs. The Recipient through NAWEC 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 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&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s).</p>	<p>Submit quarterly reports to the World Bank throughout Project implementation, commencing three months after the Effective Date.</p> <p>Submit each report to the World Bank no later than 15 days after the end of each reporting period.</p>	NAWEC
B	<p>INCIDENTS AND ACCIDENTS</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. 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. 24 hours for incidents related to SEA/SH.</p> <p>Provide subsequent report to the World Bank within a timeframe acceptable to the World Bank.</p>	NAWEC
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 before submitting such reports to the World Bank.</p>	<p>Submit the monthly reports to the World Bank as annexes to the reports to be submitted under action A above.</p>	NAWEC
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <p>Maintain the PIU within NAWEC with qualified staff and resources to support management of ESHS risks and impacts of the Project including one specialist responsible for environmental and social (E&S) management.</p>	<p>Maintain the PIU within NAWEC as set out in the Grant Agreement. Appoint the E&S specialist throughout Project implementation.</p>	NAWEC

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	NAWEC also has a well-established Project Implementation Unit (PIU) staffed with Environmental and Social Experts that are experienced in implementing and monitoring environmental and social standards.		
1.2	ENVIRONMENTAL AND SOCIAL INSTRUMENTS Adopt and implement the SEP for the project, consistent with the relevant ESSs.	Prepare, consult, adopt, and re-disclose the SEP. Once adopted, implement the respective SEP throughout Project implementation.	NAWEC
1.3	MANAGEMENT OF CONTRACTORS Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management requirements, 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.	As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation.	NAWEC
1.4	TECHNICAL ASSISTANCE Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project including, inter alia, Environmental and Social Impact Assessments (ESIAs) and Resettlement Action Plans (RAPs) be supported under the TA 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.	Throughout Project implementation.	NAWEC
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	Relevant aspects of this standard should be taken into account, where appropriate, in Action 1.2 above, including, inter alia, measures relating to occupational health and safety (OHS), grievance redress mechanism for Project workers which includes a pathway for grievances related to sexual abuse and exploitation or sexual harassment.		
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	Relevant aspects of this standard should be taken into account, where appropriate, in Action 1.2 above.		
ESS 4: COMMUNITY HEALTH AND SAFETY			

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4.1	Relevant aspects of this standard should be taken into account, where appropriate, in Action 1.2 above, including, inter alia, measures to: ensure that individuals or groups who, because of their particular circumstances, are not disadvantaged or vulnerable as a result of project activities and that they can access the development benefits resulting from the project; and prevent and respond to exploitation and SEA/SH.		
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT [the relevance of ESS5 is established during the ESA process. If resettlement instruments need to be prepared (e.g. resettlement process frameworks, resettlement action plans, process frameworks) this should be reflected in the ESCP. See examples below]			
5.2	RESETTLEMENT PLANS Assure that resettlement action plans (RAP) that are prepared for the competitive tender process are consistent with the requirements of ESS5.	Assure that the updated RAP receives non-objection from the World Bank before it is included in the competitive bidding process.	NAWEC
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES [the relevance of ESS6 is established during the ESA process. As with other ESSs, ESS6 may require the adoption of specific measures that may be set out in an E&S instrument (e.g. ESMP) already mentioned in the section under ESS1 above or as a stand-alone instrument or a separate measure or action. See examples below].			
6.1	BIODIVERSITY RISKS AND IMPACTS Biodiversity risks will be taken into account. Project planning should be ensured that the project takes appropriate measures to minimize potential impacts on biodiversity.	Throughout Project implementation.	NAWEC
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			
7.1	INDIGENOUS PEOPLES PLANNING FRAMEWORK Not relevant to the project		
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Not relevant to the Project		
ESS 9: FINANCIAL INTERMEDIARIES			
9.1	ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS) Not relevant to the Project		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION The Recipient shall maintain systematic, open and transparent engagement with all project stakeholders, in particular the parties affected by the project, consistent with ESS10. Consultation activities should take place during the project development phase to inform the competitive bidding process's design. Also, at least once a year as part of the process of monitoring, evaluating, and improving performance. The results of the		NAWEC

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<p>Program must be disclosed at the end of the Project to beneficiaries and other key or interested stakeholders. While consultations are needed with stakeholders, efforts will be made to consult with all groups, including vulnerable groups, to ensure that their specific needs are integrated into the project's risk mitigation measures.</p> <p>Consultation activities for the Project should be undertaken considering the following principles:</p> <ul style="list-style-type: none"> • Identification of all stakeholders who will develop, implement and benefit from the technical assistance, including the electricity sector, regulators, the PIU and other implementing partners, including potential IPPs and other private sector partners; • Consult all stakeholders and implement measures as necessary to ensure the participation of all actors, including vulnerable people; • Ensure that the consultation presents the objectives of the Program so that stakeholders can understand the context in which TA activities are developed; • Demonstrate how the results of stakeholder engagement have been integrated into the design and implementation of the Project; • Ensure that there is ongoing disclosure of Program activities, including the results of the consultations; • Ensure that consultation activities and results are properly documented in Program deliverables and in monthly, quarterly and annual reports submitted to the World Bank; • Identify clear roles and responsibilities for all engagement activities and provide regular monitoring reports to the PIU and the World Bank; • Maintain an operational grievance redress mechanism in accordance with section 10.2 below. 	<p>Identify stakeholders with timely, relevant, understandable, and accessible information prior to the effective date, and thereafter consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation throughout Project implementation.</p>	
<p>10.2 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>Maintain the grievance mechanism under the NAWEC PIU throughout Project implementation.</p>	<p>NAWEC</p>

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	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.		
CAPACITY SUPPORT			
CS1	<p>The training covers the following modules:</p> <ul style="list-style-type: none"> World Bank Environmental and Social Framework in the Implementation of Investment Project Financing OHS in the energy sector to strengthen the measures in place to protect workers and communities <p>The training is aimed at the following actors:</p> <ul style="list-style-type: none"> NAWEC (safeguards specialists, procurement specialist, OHS specialists, Engineers, etc.) Relevant Ministries of the Government of Gambia (Finance, Energy and Petroleum) Transaction advisor, construction companies involved in the competitive bidding process Firms and consultants involved in the preparation of bidding documents (feasibility studies, ESIA/RAPs etc.). 	Throughout Project implementation.	NAWEC