

**REPUBLIC OF THE GAMBIA**

**Ministry of Finance**

**The Gambia Resilience, Inclusion, Skills, and  
Equity Project (RISE) (P179233)**

**Draft for Appraisal**

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

**9<sup>th</sup> July ,2023**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of The Gambia (the Recipient) will implement The Gambia Resilience, Inclusion, Skills, and Equity Project (the Project), with the involvement of the Ministry of Finance and Economic Affairs (MoFEA), the Ministry of Basic and Secondary Education (MoBSE), Ministry of Higher Education, Research, Science & Technology (MoHERST), and the National Nutrition Agency (NaNA) as set out in the Financing Agreement. The International Development Association (the Association), has agreed to provide the 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, 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 the Ministry of Finance and Economic Affairs, 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 of the Ministry of Finance and Economic Affairs. 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), Environmental and Social Management Plans (ESMPs) and the Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Prevention and Response Action Plan.</p>	<p>Submit quarterly reports to the Association throughout Project implementation, commencing three months after the Project Effective Date. Submit each ESHS report to the Association no later than 15 days after the end of each reporting period.</p>	<p>The Central Fiduciary Unit (CFU) of MoFEA</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, incidents or accidents on project sites, labour influx, cases of exclusion of vulnerable groups (i.e., women, youth, people with disabilities) 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 Association’s request, the Recipient shall 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 24 hours for any fatalities or incidents related to SEA/SH.</p> <p>Provide subsequent report to the Association within a timeframe acceptable to the Association</p>	<p>The Central Fiduciary Unit (CFU) of MoFEA</p>
C	<p><b>CONTRACTORS’ MONTHLY REPORTS</b></p> <p>Require contractors 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 as annexes to the reports to be submitted under action A above.</p>	<p>The Central Fiduciary Unit (CFU) of MoFEA</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
D	<p><b>NOTIFICATIONS RELATING TO DAAB COMPLIANCE REVIEW OF CONTRACTOR COMPLIANCE WITH SEA/SH PREVENTION AND RESPONSE OBLIGATIONS</b></p> <p>Notify the Association of any referral submitted to the Dispute Avoidance and Adjudication Board (DAAB) to initiate a process of compliance review in relation to a contractor’s obligations to prevent and respond to sexual exploitation and abuse (SEA), and/or sexual harassment (SH) specified in the respective works contract with such contractor; and, in the event of any such referral, notify the Association of: (i) the DAAB’s decision on such referral; (ii) the contractor’s Notice of Dissatisfaction, if any, with such DAAB decision; (iii) any notification received on the commencement of an emergency arbitration proceeding or full arbitration proceeding in relation to the DAAB’s decision; and (iv) the resulting emergency arbitration order and/or full arbitration order, if any.</p>	<p>No later than 7 days after the issuance or receipt, as applicable, of the relevant document (i.e., referral to the DAAB, issuance of DAAB decision, Notice of Dissatisfaction, notice of commencement of emergency/full arbitration, emergency/full arbitration order, as applicable).</p>	<p>The Central Fiduciary Unit (CFU) of MoFEA</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 Central Fiduciary Unit (CFU) within the Ministry of Finance and Economic Affairs (MoFEA) with qualified staff and resources to support management of ESHS risks and impacts of the Project including one environmental specialist and one social development specialist with gender and GBV/SEA/SH experience, with qualifications, experience, and conditions of employment acceptable to the Association.</p>	<p>Establish and maintain the CFU as set out in the Financing Agreement.</p> <p>Hire or appoint one environmental specialist, one social development specialist with gender and GBV/SEA/SH experience no later than three (03) months after Project Effective Date, and thereafter maintain the CFUPIU and these positions throughout Project implementation.</p>	<p>MoFEA</p>
1.2	<p><b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <p>1. Prepare, disclose, adopt and implement an Environmental and Social Management Framework (ESMF) for the project including a plan for prevention and response to gender-based violence (GBV), sexual exploitation and abuse (SEA) and sexual harassment (SH) with Codes of Conduct, consistent with the relevant ESSs.</p>	<p>1. Finalize, disclose, and adopt the project ESMF including the prevention and response plan for gender-based violence (GBV), sexual exploitation and abuse (SEA) and sexual harassment (SH) prior to the project’s appraisal. Thereafter, implement the ESMF throughout Project implementation.</p>	<p>The Central Fiduciary Unit (CFU) of MoFEA</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>2. Prepare, disclose adopt and implement an Environmental and Social Impact Assessment (ESIA) and a corresponding Environmental and Social Management Plan (ESMP) for the construction of Technical and Vocational Education and Training (TVET) Center of Excellence (CoE) in selected trades (under Component 1) consistent with the relevant ESSs.</p> <p>3. Adopt and implement the site-specific Environmental and Social Impact Environmental and Social Management Plan (ESMP), when applicable, as set out in the ESMF. The proposed activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</p>	<p>2. Adopt and disclose an Environmental and Social Impact Assessment (ESIA) and an Environmental and Social Management Plan (ESMP) before launching before launching of the bidding process for the respective sites and prior to the implementation of each construction activity. Once adopted, implement the ESIA and ESMP throughout Project implementation</p> <p>3. Adopt the ESMP before launching the bidding process for the respective Project activity that requires the adoption of such ESMP. Once adopted, implement the respective ESMP throughout Project implementation.</p>	
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 Labor Management Procedures, and code of conduct, SEA/SH Action Plan, 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>	<p>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise contractors throughout Project implementation.</p>	The Central Fiduciary Unit (CFU) of MoFEA
1.4	<p><b>TECHNICAL ASSISTANCE</b></p> <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), 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, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	<p>Throughout Project implementation.</p>	The Central Fiduciary Unit (CFU) of MoFEA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.5	<p><b>CONTINGENT EMERGENCY RESPONSE FINANCING</b></p> <p>a) Ensure that the CERC Manual (CM) as specified the legal agreement includes a description of the ESHS assessment and management arrangements including the ESMF CERC Addendum that will be included or referred to in the ERM for the implementation of the CERC Part, in accordance with the ESSs.</p> <p>b) Prepare, consult, adopt, and disclose any environmental and social (E&amp;S) instruments which may be required for activities under the CERC Part of the Project, in accordance with the CM and, if applicable, CERC-ESMF or CERC-ESMF Addendum and the ESSs, and thereafter implement the measures and actions required under said E&amp;S instruments, within the timeframes specified in said E&amp;S instruments.</p>	<p>a) The adoption of the CM in form and substance acceptable to the Association is a withdrawal condition under Section D of Schedule 2 of the Financing Agreement for the Project.</p> <p>b) 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>	MoFEA and the designated authority for the CERC
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Adopt and implement the Labor Management Plan (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>	Adopt the LMP prior to Project Effective date and thereafter implement the LMP throughout Project implementation.	The Central Fiduciary Unit (CFU) of MoFEA
2.2	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	The Central Fiduciary Unit (CFU) of MoFEA contractors/sub-contractors
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>WASTE MANAGEMENT PLAN</b></p> <p>Adopt and implement a Waste Management Plan (WMP) as part of the project ESMF, sites specific ESIA/ESMP and contractors ESMPs, to manage hazardous and non-hazardous wastes, consistent with ESS3.</p>	Same timeframe as for the adoption of the project ESMF, site specific ESIA/ESMP, C-ESMPs and thereafter implement the WMP throughout Project implementation.	The Central Fiduciary Unit (CFU) of MoFEA /contractors

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
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 ESMF, ESIA/ESMP to be prepared under action 1.2 above, and C-ESMPs.</p>	Same timeframe as for the adoption and implementation of the ESMF, ESIA/ESMP and C-ESMPs.	The Central Fiduciary Unit (CFU) of MoFEA /Contractors
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>Adopt and implement measures to manage traffic and road safety risks as required in the ESMF, /ESMP to be prepared under action 1.2 above, and C-ESMPs.</p>	Same timeframe as for the adoption and implementation of the ESMF, ESMP, as well as C-ESMPs	The Central Fiduciary Unit (CFU) of MoFEA /Contractors/Sub-Contractors
4.2	<p><b>COMMUNITY HEALTH AND SAFETY</b></p> <p>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 ESMP to be prepared in accordance with the ESMF.</p>	Same timeframe as for the adoption and implementation of the ESMP.	The Central Fiduciary Unit (CFU) of MoFEA
4.3	<p><b>SEA AND SH RISKS</b></p> <p>Adopt and implement a SEA/SH Action Plan [specify if part of another instrument, e.g., as part of the ESMP], to assess and manage the risks of SEA and SH.</p>	Adopt the SEA/SH Action Plan at the same time as the ESMP in section 1.2 and thereafter implement the SEA/SH Action Plan throughout Project implementation.	The Central Fiduciary Unit (CFU) of MoFEA
4.4	<p><b>SECURITY MANAGEMENT</b></p> <p>Assess and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities, as set out in the ESMF, sites specific /ESMP, C-ESMP, guided by the principles of proportionality and Good International Industry Practice (GIIP), and by applicable law, in relation to hiring, rules of conduct, training, equipping, and monitoring of such personnel.</p>	Same timeline as for the preparation of the ESMF, site specific /ESMP, C-ESMP and Prior to engaging security personnel and thereafter implement security measure throughout Project implementation.	The Central Fiduciary Unit (CFU) of MoFEA /Contractors
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			

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	<b>This performance standard is not relevant as there will be no land acquisition in the project.</b>		
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	This ESS is not relevant based on information received to date. At this stage there is not enough information on the sensitivity of the intervention areas regarding biodiversity. The environmental and social assessment to be developed will be assessed and if confirmed will propose appropriate mitigation measures.	Same timeline as for the adoption and implementation of the ESMF, site specific ESMP, C-ESMPs and thereafter implement these measures throughout Project implementation.	The Central Fiduciary Unit (CFU) of MoFEA /contractors
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
	<b>This standard is not relevant to the project.</b>		
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<b>CULTURAL HERITAGE RISKS AND IMPACTS</b> Adopt and implement measures to protect Cultural Heritage as part of the site specific ESIA/ESMP, C-ESMPs, in accordance with the guidelines of the ESMF prepared for the Project, and consistent with ESS8.	Same timeline as for the adoption and implementation of the ESMF, site specific ESMP, C-ESMPs and thereafter implement these measures throughout Project implementation.	The Central Fiduciary Unit (CFU) of MoFEA /Contractors
8.2	<b>CHANCE FINDS</b> Describe and implement the chance finds procedures, as part of the ESMF and the ESMP of the Project.	Describe the chance find procedures in the ESMF and ESMP. Implement the procedures throughout Project implementation.	The Central Fiduciary Unit (CFU) of MoFEA
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
	<b>This standard is not relevant to the project.</b>		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION</b> 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	The SEP will be completed and disclosed prior to Appraisal, and thereafter implement the SEP throughout Project implementation.	The Central Fiduciary Unit (CFU) of MoFEA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.		
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 gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	Establish the grievance mechanism no later than 3 months after project approval.	The Central Fiduciary Unit (CFU) of MoFEA
<b>CAPACITY SUPPORT</b>			
CS1	<p><b>Training to be provided</b></p> <p>The MoFEA’s CFU shall ensure that relevant project actors are trained in the following areas:</p> <ul style="list-style-type: none"> <li>• The project’s GM, including the processes for handling sensitive complaints such as SEA/SH incidents</li> <li>• Stakeholder Engagement Plan and good practices related to engaging stakeholders in an ethical and responsive way</li> <li>• Labor Management Procedures</li> <li>• E&amp;S requirements (impacts and mitigation measures) of sub-projects</li> <li>• Subproject Environmental and Social screening</li> <li>• Occupational Health and Safety for Contractors</li> <li>• Emergency preparedness and response</li> <li>• Communication strategy on COVID-19 and activities/protocols regarding prevention and mitigation of transmission, PPE, OHS</li> </ul>	Immediately after Project Effective Date and during project implementation	The Central Fiduciary Unit (CFU) of MoFEA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ul style="list-style-type: none"> <li>SEA/SH/VAC risk awareness; SEA/SH Prevention and Response Action Plan, content, and sanctions of CoCs, and GM of project (i.e., importance, objectives, content, how to prepare it, who implements it, and how to ensure a GM-sensitive SEA/SH issues</li> <li>Disability inclusion training and training on inclusion of other vulnerable groups</li> <li>Documentation, monitoring and reporting</li> <li>Gender inclusion action plan</li> <li>World Bank ESF and ESSs</li> <li>Other (to be determined according to needs)</li> </ul>		
CS2	<p>Project workers to receive training on:</p> <ul style="list-style-type: none"> <li>Stakeholder Mapping and Engagement</li> <li>Environmental and Social screening</li> <li>Environmental and social risk and impact management</li> <li>SEA/SH risk management and GM</li> <li>Labor Management Procedures and GM</li> <li>Training for Project workers on occupational health and safety including on emergency prevention and preparedness and response arrangements to emergency situations, including Occupational Health and Safety, Community Health and Safety (i.e., including traffic and road safety, mitigation measures related to communicable diseases), COVID-19 mitigation; Codes of Conduct , Emergency preparedness and response (CERC), SEA/SH risks, reporting requirements</li> </ul>	Immediately after Effectiveness Date and during project implementation	The Central Fiduciary Unit (CFU) of MoFEA