

**Government of The Gambia/  
Ministry of Communications and Digital  
Economy**

**Western Africa Regional Digital Integration  
Program (P176932)**

**(Draft for Negotiations)**

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

**June 1, 2022**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Government of The Gambia (the Recipient), will implement the Western Africa Regional Digital Integration Program, with the involvement of the Ministry of Communications and Digital Economy, Central Bank of The Gambia, The Public Utility Regulatory Authority and The Gambia ICT Agency, as set out in the Financing Agreement. The International Development Association (“the Association), has agreed to provide financing for the Western Africa Regional Digital Integration Program (WARDIP, P176932) 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 the Ministry of Communications and Digital Economy and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient. 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>Quarterly throughout the Project's Implementation, starting with the Project Effective Date.</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 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.</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 with qualified staff and resources to support management of ESHS risks and impacts of the Project including one (1) environmental and one (1) social specialist</p>	<p>Establish and maintain a PIU with the required qualified staff as set out in the Financing Agreement and thereafter maintain these positions throughout Project implementation.</p>	<p>Ministry of Communications and Digital Economy (MoCDE) and PIU</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>1.2 <b>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</b></p> <p>Prepare, consult upon, disclose, adopt, and thereafter implement the following risk assessment and management tools and instruments, consistent with the relevant ESSs:</p> <ul style="list-style-type: none"> <li>▪ The Environmental and Social Management Framework (ESMF) including the SEA/SH Prevention and Response Action Plan as an annex.</li> <li>▪ The Environmental and Social Impact Assessment/ Environmental and Social Management Plan (ESIA/ESMP) required for the sub-projects in a manner acceptable to the Association and in line with the ESMF.</li> <li>▪ The Stakeholder Engagement Plan (SEP) and the Grievance Mechanism (GM);</li> <li>▪ The Labor Management Procedures (LMP);</li> <li>▪ The Resettlement Policy Framework (RPF)</li> <li>▪ The Resettlement Action Plan in line with the RPF</li> </ul>	<p>The final version of the ESCP and SEP, will be disclosed prior to the project appraisal.</p> <p>The final version of the ESMF, RPF and LMP will be disclosed prior to the project approval.</p> <p>The ESMP; ESIA shall be prepared, disclosed, consulted upon, and adopted during the preparation of the sub-projects and before the commencement of works.</p> <p>RAPs will be prepared as soon as ESIA have established impacts related to involuntary resettlement requiring a RAP.</p> <p>The specific environmental and social studies (ESIA / ESMP, RAP, etc.) for the project activities will be prepared during project implementation, based on the results of the environmental and social screening process, and submitted to the Association for approval prior to launching the bidding process for the respective sub-project activities. Once approved, the environmental and social plans will be disclosed in-country and on the Bank external website.</p>	<p>MoCDE and PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		These instruments will be implemented throughout the implementation of the Project.	
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.</p>	<p>All relevant ESCP will be incorporated as part of the preparation of procurement documents and respective contracts.</p> <p>Supervision of contractors throughout Project implementation.</p>	PIU
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 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 applicable, CERC-ESMF/ESMF 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, CERC-ESMF or CERC-ESMF 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>a) The adoption of the CERC manual in form and substance acceptable to the World Bank is a withdrawal condition under Section of Schedule 2 of financing agreement of 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>	MocDE
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>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>	Adopt the LMP prior to the Project approval, and thereafter implement the LMP throughout Project implementation.	PIU
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 engaging Project workers and thereafter maintain and operate it throughout Project implementation.	PIU
2.3	<p><b>OCCUPATIONAL HEALTH AND SAFETY MEASURES (OHS):</b></p> <p>Undertakes to implement and incorporate in the tender documents, the Terms of Reference and contracts of the project's suppliers/providers, the clauses relating to Occupational Health and Safety (OHS) specified in the project's Environmental and Social Management Framework (ESMF), Labor Management Procedures (LMP) and any other OHS measures recommended by the sub-project's specific Environmental and Social Management Plan (ESMP). It undertakes to ensure that the Project's contractors/suppliers comply with these Occupational Health and Safety (OHS) measures.</p>	<p>Before the start of works.</p> <p>Before publishing any procurement notice for suppliers/providers (integration of OHS measures).</p> <p>Throughout the implementation of the Project</p>	PIU
<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), required by the specific ESMP to be prepared under action 1.2 above, to manage hazardous and non-hazardous wastes, consistent with ESS3.</p>	Adopt the WMP prior to commencing project activities, and thereafter implement the WMP throughout Project implementation.	PIU
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>	Same timeframe as for the adoption and implementation of the ESMP.	PIU
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<p><b>TRAFFIC AND ROAD SAFETY</b></p> <p>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.</p>	Same timeframe as for the adoption and implementation of the ESMP.	PIU

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 as for the adoption and implementation of the ESMPs.	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 adoption and implementation of the ESMPs	PIU
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			
5.1	<b>RESETTLEMENT POLICY FRAMEWORK</b> Adopt and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5 and ESS10.	Adopt the RPF prior to the Project approval, and thereafter implement the RPF throughout Project implementation.	PIU
5.2	<b>RESETTLEMENT PLANS</b> [Prepare, 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.	Adopt and implement the 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.	The GM shall be operational before the start of the resettlement activities.	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 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.	Same timeframe as for the adoption and implementation of the ESMPs, throughout Project implementation.	PIU
<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>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>	Same timeframe as for the adoption and implementation of the ESMPs, and thereafter implement the CHMP throughout Project implementation.	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>	Describe the chance find procedures in the ESMP. Implement the procedures throughout Project implementation.	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>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>	Adopt the SEP before the project appraisal, and thereafter implement the SEP throughout Project implementation.	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 gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	<p>GM to be operational not later than six (6) months after Project's Effective Date and maintained throughout the implementation of the Project</p> <p>Communication plan shall be available no later than one month after the Project's Effective Date.</p>	PIU
<b>CAPACITY SUPPORT (TRAINING)</b>			
CS1	<p>Training will be provided for PIU staff, stakeholders, communities, Project workers on:</p> <ul style="list-style-type: none"> <li>• Environment and Social Framework ESF Requirements of the Bank.</li> <li>• stakeholder mapping and engagement</li> <li>• specific aspects of environmental and social assessment</li> <li>• community health and safety.</li> <li>• Identifying, handling and management of SEA/SH and GBV.</li> <li>• Roles and responsibilities for environmental and social issues</li> </ul>	During the implementation of the Project as when needed.	PIU with the support/guidance from the World Bank



	<ul style="list-style-type: none"> <li>● Occupational health and safety (including COVID-19 recommendation)</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> <li>● Waste Management</li> </ul>		
CS2	Regular training shall be provided for Project workers on occupational health and safety, SEA/SH, GBV, Waste Management including on emergency prevention and preparedness and response arrangements to emergency situations.	Before the start of relevant project activities and throughout the project's implementation.	PIU