

REPUBLIC OF THE GAMBIA



**WEST AFRICA COASTAL AREAS (WACA) RESILIENCE INVESTMENT
PROJECT 2 (WACA ResIP2)**

(P175525)

**Environmental and Social Management
Framework (ESMF)**

Draft Report

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Abbreviations & Acronyms

AVVA	Aerial Videotape-assisted Vulnerability Analysis
BAC	Brikama Area Council
BCC	Banjul City Council
CBD	Convention on Biological Diversity
CEDAW	UN Convention on the Elimination of all forms of Discrimination against Women
C-ESMP	Contractor Environmental and Social Management Plan
CITES	Convention on International Trade in Endangered Species
CoC	Code of Conduct
CSOs	Civil Society Organizations
DSA	Deep Sandstone Aquifer
EHSg	Environment, Health, and Safety Guidelines
ESIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standard
GAMWORKS	The Gambian Agency for Management of Public Works
GBA	Greater Banjul Area
GBoS	Gambia Bureau of Statistics
GBV	Gender-based Violence
GDP	Gross Domestic Product
GEAP	Gambia Environmental Action Plan
GHG	Greenhouse Gases
GIIP	Good International Industry Practice
GM	Grievance Mechanism
GMD	Gambian Dalasi
GoTG	Government of The Gambia
GTB	Gambia Tourism Board
ICRC	International child rights convention
ILO	International Labor Organization

IPF	Investment Project Financing
ISO	International Organization for Standardization
ITCZ	Inter-Tropical Convergence Zone
KMC	Kanifing Municipal Council
LGA	Local Government Area
MECCNAR	Ministry of Environment, Climate Change and Natural Resources
NEMA	National Environment Management Act, 1994
MoBSE	Ministry of Basic and Secondary Education
MoGCSW	Ministry in charge of Gender, Children and Social Welfare
NCAC	National Council of Arts and Culture
NAPA	National Adaptation Program of Action
NAWEC	National Water and Electricity Company
NBSAP	National Biodiversity Strategic Action Plan
NDMA	National Disaster Management Agency
NDP	National Development Plan
NEMA	National Environment Management Act
NGO	Non-Governmental Organization
NRA	National Road Authority
OHSP	Occupational Health and Safety Plan
OPD	Out Patient Department
PAP	Project Affected Person
PDO	Project Development Objective
PIZ	Project Intervention Zone
RP	Resettlement Plan
RPF	Resettlement Policy Framework
SEA/SH	Sexual Exploitation and Abuse/Harassment
SEP	Stakeholder Engagement Plan
SSA	Deep Sandstone Aquifer
SSCT	SEA/SH Compliance Team
TDA	Tourism Development Area
TWNP	Tanbi Wetland National Park
UNCRC	United Nations Convention on the Rights of the Child
USD	United States Dollar

WACA ResIP II	West Africa Coastal Areas Resilience Investment Project II
WCR	West Coast Region
WHO	World Health Organization

GLOSSARY OF TERMS

Cumulative impacts/effects: The impact on the environment resulting from the action's incremental impact when added to other past, current and reasonably foreseeable future actions.

Direct impacts: These are effects that occur through the direct interaction of an activity with an environmental, social, or economic component.

Disclosure: Information is available to all stakeholders at all stages of the development of projects.

Environment: this is a diversity of things made up of natural and artificial environments. It includes chemical substances, biodiversity, socio-economic activities, cultural, aesthetic, and scientific factors likely to have direct or indirect, immediate or long-term effects on the development of an area, biodiversity, and human activities.

Environmental Impact Assessment (EIA): It is an instrument to identify and assess the potential environmental impacts of a proposed project, evaluate alternatives, and design appropriate mitigation, management, and monitoring measures.

Environmental Monitoring: This instrument provides, during project implementation, information about key environmental aspects of the project that enables the borrower and the bank to evaluate the success of mitigation as part of project supervision and allows corrective action to be taken when needed.

Grievance: An issue, concern, problem, or claim (perceived or actual) that an individual or community group wants a company or contractor to address or resolve.

Impact: A positive or negative effect caused by a project or an activity in the environment.

Indirect impacts: are effects that are not a direct result of the project, often produced away from or as a result of a complex impact pathway. They are also known as secondary or even third-level impacts.

Involuntary resettlement: This is a policy triggered in situations involving (a) involuntary taking of land resulting in (i) relocation or loss of shelter, (ii) loss of assets or access to assets, or (iii) loss of income sources or means of livelihood, whether or not the affected persons must move to another location; or (b) the involuntary restriction of access to legally designated parks and protected areas resulting in adverse impacts on the livelihoods of the displaced persons. The policy aims to avoid involuntary resettlement to the extent possible or reduce and mitigate its adverse social and economic impacts.

Mitigation measures: This refers to feasible and cost-effective measures that may reduce potentially significant adverse environmental impacts to acceptable levels.

Pollution: is the contamination caused by waste, harmful biochemical products derived from human activities that may alter man's habitat and cause adverse effects on the environment like man's social well-being, animals, flora and fauna and the world they live in.

Scoping: Scoping is the process of determining the content and extent of matters that should be covered in the environmental information to be submitted to a competent authority or other decision-making body.

Screening: This determines whether or not an EIA is needed and is a formal requirement under the EIA Regulations.

Executive Summary

The Government of The Gambia is preparing with financial support from the World Bank the West Africa Coastal Areas Resilience Investment Project 2 (WACA RESIP2). The Project is regional and the Project Development Objective (PDO) is to 'strengthen the resilience of targeted communities and areas in coastal Western Africa'. The Ministry of Environment, Climate Change and Natural Resources (MECCNAR) through the Central Project Coordination Unit will implement the project. In The Gambia, the project objective will be:

- a) Strengthen the resilience to flood risks;
- b) Improve the attractiveness and accessibility of the riverfront: recreational purposes, biodiversity;
- c) Enhance socio-economic development of area;
- d) Improve livability and urban environment;
- e) Reduce pollution from uncontrolled storm water runoff;
- f) Improve public health conditions; and
- g) Improve accessibility/connectivity avoiding traffic disruption.

The Project has 4 components, namely:

Component 1: Strengthen Regional integration. This component is to support regional integration by strengthening the effective coordination of interventions for coastal resilience in West Africa at the regional and national levels by the consolidation of the regional institutional set-ups and harmonization of policies.

Component 2: Strengthening the policy or institutional frameworks. This component will support the strengthening of targeted institutional and policy frameworks around flood and coastal risk management, integrated flood management, integrated coastal development, natural resource management, urban resilience in The Gambia. Three areas have been identified: (a) support in mainstreaming disaster risk reduction and climate change in key sectors (e.g. Urban development), (b) strengthening institutional capacities for effective and streamlined climate change and disaster risk reduction (DRR) responses; and (c) improving the quality of hydro-meteorological services and early warning systems.

Component 3: Strengthening Physical and social investments. This component consists of two subcomponents as follows:

Sub-component 3.1: Physical investments -This component will finance site-specific interventions for coastal protection and/or flood control to reduce risks of flooding and/or erosion in the Greater Banjul Area (GBA). The project is expected to finance a mix of gray, green, and hybrid infrastructure solutions along/in selected prioritized Kotu Stream hotspot to reduce risks of flooding and erosion.

Subcomponent 3.2: Social Subprojects- This subcomponent will support targeted communities in area(s) of intervention so that they not only benefit as much as possible from the physical infrastructure and potential job opportunities for instance, but also contribute to their sustainable management (operation and maintenance) and strengthen their resilience to climate change impacts. The project will also support interventions for social development and economic recovery based on the needs of affected communities.

Component 4: Project management. This component will finance project management costs including

environmental and social risk management as well as monitoring and evaluation. This includes support to the Project Implementation Unit (PIU) for staffing, project technical audits, financial management, procurement and training. It will also support the National Steering Committee and the National Technical Committee.

Project beneficiaries include:

- The communities, including women and youth, living in the Kotu Stream catchment area who are victims of regular flooding and erosion resulting in the destruction of properties and life
- Technical Government agencies such as the National Disaster Management agency, the Meteorology and Hydrology Services that will benefit from capacity strengthening programs for effective and streamlined climate change and disaster risk reduction (DRR) responses as well as the Department of Physical Planning, National Roads Authority and Ministry of Transport, Works and Infrastructure, the Ministry of Gender and Children and the Ministry of Tourism
- Select local community beneficiaries of social projects to support livelihood improvement and build resilience to climate change and floods
- Hotels in the tourism area along the coast such as Sunset Beach Hotel that suffer from fluvial erosion and pollution through an improved drainage system for the stream and waste management
- School children and sick people by facilitating access through improved communication/connectivity to schools and health centers especially during the rainy season
- Small traders and businesses such as women vendors, mechanics, carpenters etc. who regularly suffer the negative impacts of annual flooding (loss of goods and business)
- Kanifing Municipality and the Brikama Area Council that will see improved waste management and savings in the amount spent on disaster relief in their communities.

Rationale for the Environmental and Social Management Framework (ESMF)

Implementation of some project's activities may have risks and impact on the environment and people. The management of environmental and social risks and impact will follow requirement of the relevant Environmental and Social Standards (ESSs) of the World Bank Environmental and Social Framework (ESF). The ESMF is an instrument that examines the risks and impacts when a project consists of a program and/or series of subprojects, and the risks and impacts cannot be determined until the program or subproject details have been identified. It sets out the principles, rules, guidelines and procedures to assess the environmental and social risks and impacts associated with the implementation of the project. . It contains measures and plans to reduce, mitigate and/or offset adverse risks and impacts, provisions for estimating and budgeting the costs of such measures, and information on the agency or agencies responsible for addressing the environmental and social risks and impacts.

Once the site and technical designs of the proposed sub-project activities are known, the E&S screening process, as per the ESMF determine the site-specific environmental and social (E&S) instruments to be prepared.

Methodology for the preparation of the ESMF

The ESMF is prepared is prepared according to the World Bank Environmental and Social Framework taking into consideration national environmental and social protection regulations, international

conventions and the World Bank Group General Environmental, Health and Safety Guidelines (EHSs)¹.

The activities undertaken include the following:

- Scoping
- Literature/document review
- Field visits and consultations with relevant institutions and implementing partners
- Key informant interviews with representatives of government institutions and non-government organizations (NGOs)

Legal and Institutional Framework for Environmental and Social Assessments

The ESMF for this project is based on Gambian laws and policies for environmental and social protection and the World Bank's Environmental and Social Framework (ESF) and the Environmental and Social Standards (ESS). The following is a select list of the relevant documents consulted.

The national legal frameworks include the following:

- The Constitution of the Republic of the Gambia (1997)
- The Environmental Impact Assessment Regulations (EIA) 2014
- National Environmental Management Act 1994
- The Land Acquisition and Compensation Act 1991 (LACA)
- The Gambia Environmental Action Plan (GEAP)
- The Biodiversity and Wildlife Act, 2002
- The Forestry Act (2018) and Forest Policy (2009-2019)
- Labor Act 2007
- Environmental Impact Assessment Guidelines and Procedures-(1999)
- Anti-Littering Regulations, 2007
- Public Health Act, 1990

The relevant World Bank Environmental and Social Standards are:

- ESS1 - Assessment and Management of Environmental and Social Risks and Impacts
- ESS2 - Labor and Working Conditions
- ESS3 - Resource Efficiency and Pollution Prevention and Management
- ESS4 - Community Health and Safety
- ESS5 - Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement
- ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources
- ESS8 - Cultural Heritage
- ESS10 - Stakeholder Engagement and Information Disclosure

Key Environmental and Social Challenges of the Project

The project intervention zone is densely populated and is inhabited by relatively low-income communities with a high social flood vulnerability. The major environmental and social challenges include:

Flooding

The area is prone to both pluvial and fluvial flooding. In the upstream section, fluvial flooding causes direct damage to infrastructure (economic damage to houses, roads, etc.). Indirect damages also occur

¹ The guidelines for Environment, Health and Safety can be consulted at the following link: https://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/Sustainability-At-IFC/Policies-Standards/EHS-Guidelines/

and they consist of disruption to productive activities, employment, travel, and additional costs associated with flood management. Unplanned settlements together with dumping of waste in the stream obstruct the water flow, which have reduced the drainage capacity of the stream so that floods occur with heavy rains.

With climate change, floods have become frequent and with increased severity increased damage to property and times in the loss of life. The socioeconomic conditions of the residents and the poor infrastructure have made them very vulnerable to the impacts of climate change.

Poor waste management

This is another major environmental challenge and a major contributor to degrading the environment quality. There is indiscriminate waste disposal by residents in the stream and on the banks, which has blocked, in some cases, the stream's flow path. The waste include hazardous household wastes such as residues of toxic chemicals (paints, insecticide spray cans, dry cell batteries, fluorescent tubes and discarded electronic equipment). The large open dump at Bakoteh has long been the main disposal site for wastes collected in the KMC area, but the recent rapid growth in waste volume disposed there has turned the site into a major environmental hazard. In addition, there are reports of untreated sewage being dumped into the estuary by the Sewage Treatment Plant at Kotu.

Erosion

Erosion is also another major environmental challenge in the project area. The heavy rains severely erode the banks resulting in the loss of crops and houses and other infrastructure located too close to the stream. It has led to increased pollution and sedimentation in the stream, clogging the waterway with the potential risk of causing declines in different species that live in the stream ecosystem. The combined effect of these factors is increased poverty for the residents of the area.

Ecological sensitivity

Kotu Stream area is an ecologically sensitive with many habitat types important to both flora and fauna especially for the bird species. The coastline of The Gambia serves as stopover for Palearctic migratory birds into Tropical Africa and Kotu stream is one of the areas that provides important feeding and breeding grounds for some of these migratory species as well as the inter-African and resident species. Some of the birds sited in this area already feature in the IUCN red list of endangered species. Presently, the ecosystem is threatened by encroachment of human settlement, pollution from water coming from the upstream and the Sewage Treatment Plant as well as accidental oil spills from the Kotu Power Station.

Limited access to basic services

With the increasing population in the area, the need for social service such as education and health has increased. The limited capacity at the schools especially at the Upper and Senior Secondary levels has meant children from these communities are unable to continue their schooling within their communities and have to either dropout or continue elsewhere with the difficulties of transportation and transport fares and other related costs. Although health facilities exist in nearby neighborhoods, access to these facilities is limited by poor road network especially during the rainy season and high transport cost.

Potential Environmental and social risks and impacts

According to the initial screening carried out during project preparation by the WB, the overall project environmental and social risk classification (ESRC) is considered High both for social and for environment.

Key environmental risks and impacts relate to: (i) risks of air pollution as a result of dust and exhaust fumes during land preparation and construction; (ii) loss of vegetation and small wildlife habitats; (iii) soil and ground water pollution (ii) management of waste from the rehabilitation/construction works ; (iii) communities and workers' occupational health and safety, including the risks of exposure to communicable diseases such as COVID-19 and sexually transmitted Infections (STIs) ; and (iv) nuisances related noise; vi) traffic accidents involving project workers and members of the community; and (vi) impacts on cultural heritage.

Key social risks and impacts include (i) loss of land and other assets or restriction of access to livelihood; ii) intercommunal conflict as a result of conflicting claims over land ownership; iii) discrimination and lack of transparency in employment of workers especially for vulnerable groups including women and persons with disabilities; iv) risk of sexual exploitation and abuse/sexual harassment (SEA/SH) and child labor; v) risk of exclusion of vulnerable groups from consultations and decision –making and from project benefits.

Environmental risk & impact mitigation measures

- Contractors should be instructed in their contracts to reduce air pollution by using well-maintained equipment and water bowsers to reduce dust pollution.
- Comply with current applicable technical standards for the use of heavy equipment.
- Maintain equipment regularly to avoid excessive exhaust emissions.
- Reduce traffic speed to 30 km/h when crossing a community settlement. On all project sites, the speed limit will be 20 km/h.
- Construction workers should be trained on the use of appropriate tools and PPEs during construction and provided with the necessary personal protection equipment (PPE) such as nose/ facial masks and eye goggles and ear plugs.
- Regular watering of access roads, especially in dry weather/season by the contractors to reduce dust emissions should be included in the Contractors' contracts to ensure compliance, which should be monitored using the appropriate Health and Safety and Social and Environmental monitoring tools.
- Implement the “chance finds” procedure when cultural artefacts are discovered during construction/rehabilitation
- Ensure a compensatory reforestation in case of important felling of trees, deforestation (i.e., two replacement trees for one felled tree) and involve the Department of Forestry and beneficiary communities in the reforestation exercise.
- Contractor prepares and adequately implements its own Contractor ESMP (C-ESMP) and Occupational Health and Safety Plan (OHSP).
- Contractor to implement waste management plan for the collection of all waste including liquid waste. Collect used oil in drums for possible recycling.
- Both the Contractor and the Supervising Engineer will establish an Integrated Environmental, Social and Health and Safety System in compliance with ISO 14001 and ISO 45001.
- Both the Contractor and the Supervising Engineer will recruit an experienced Environmental and an experienced Social Specialist, as well as an experienced and ISO 45001:2018 or equivalent certified Health and Safety Specialist. These 6 specialist will be full time present at the construction sites during working hours.

Social risks and impacts mitigation measures

- Compensation of all assets including land lost to the project in accordance with the Resettlement Plan (RP)
- Ensure that vulnerable groups are adequately consulted during every phase of the project and that their concerns are adequately considered during the planning and implementation of the project
- Develop a Gender and Inclusion Action Plan to mainstream gender and vulnerable groups (including the differently-abled) in project activities
- Establish a functional grievance mechanism (GM) where the public can lodge complaints related to project activities

- Establish, as part of the GM, a special procedure for addressing complaints related to SEA/SH which is confidential, ethical, responsive and victim centered
- Implementation of labor management procedures (LMP) to ensure fair and transparent labor management
- Prohibition of sexual SEA/SH in the workplace
- Have workers sign codes of conduct prohibiting sexual exploitation and abuse, and sexual harassment
- Establish a GM for workers to lodge complaints related to the work environment
- Sensitization of the GM (including for sensitive complaints)
- Regular consultations with affected communities and workers as provided for in the Stakeholders engagement plan (SEP)
- Implementation of a health and safety plan which includes proper signage and cordons off especially for construction sites with key materials

Environmental and Social Management Process

The ESMF provides for an environmental and social screening process for all subprojects using the risk classification of the World Bank: High, Substantial, Moderate and Low. As indicated in the table below the screening will consist of 9 phases.

Step	Action	Responsible agency	Timeframe
1	Completion of the environmental and social screening form	PIU E&S risks and impacts management Team & NEA	Before the start of physical activities of an identified sub-project with a well-defined implementation site.
2	Validation of the site screening, environmental, and social classification of activities.	PIU Coordinator+ PIU E&S specialists + NEA & WB E&S Team	Before the start of physical activities of an identified sub-project with a well-defined implementation site.
3	Preparation and validation of TORs to develop the E&S risk mitigation instruments	PIU E&S specialists + NEA + WB	Before the start of physical activities of an identified sub-project with a well-defined implementation site.
4	Carrying out the environmental and social work (preparation of the risk mitigation instruments)	Consultants (to be hired by PIU)	Before the start of physical activities of an identified sub-project with a well-defined implementation site.
5	Public consultation	PIU E&S team and Consultants	During the preparation of E&S instruments
6	Review of the Environmental and Social instruments (Environmental and Social Impact Assessment (ESIA) or site-specific ESMP reports, RAP, including public hearings and dissemination, and obtaining the environmental authorization from NEA and the No Objection from the World Bank	PIU E & S Team _ NEA WB E&S Document Review	Before physical start of civil works.

7	Disclosure of the document	PIU and WB	After approval from NEA and No Objection from WB
8	Integration of environmental and social provisions in the bidding documents	PIU Safeguards Team	Very early during sub-projects (activities) preparation & 3/5 months before the physical start of civil works
9	Implementation of environmental and social measures	PIU E & S specialists all other stakeholders	Throughout the Implementation of the sub-project
10	Preparation and implementation of the C-ESMP and OHSP	Contractor	Throughout the Implementation of the sub-project
11	Environmental and social monitoring and follow-up	Supervising Engineer PIU Safeguards Team and NEA	Throughout Implementation

Institutional arrangement for the implementation of the environmental and social management procedure for the sub-projects

The PIU will be responsible for overseeing the implementation of the Environmental and social risk mitigation measures in collaboration with the relevant implementing partners (IP) and the National Environment Agency to ensure compliance with the environmental and social (E&S) instruments of the project. It will be responsible for obtaining permits and authorizations required by the regulations, preparing the quarterly monitoring reports and the completion report. The Unit staff will include experienced environmental and social specialists, and an ISO 45001 specialist or equivalent Health and Safety Specialist, a GBV Specialist, and a communications specialist.

The PIU reports to the Steering Committee, and ensures that the World Bank and other stakeholders receive all environmental and social monitoring and follow-up reports. Other entities with a role in the implementation of the ESMF include **GAMWORKS, the National Roads Authority and the National Environment Agency who will work with the consultants to develop Social and Environmental Monitoring Tools for inspection and will provide together with the Supervising Engineer the necessary oversight to ensure Contractor compliance.** The Contractors must carry out the work in accordance with the provisions of the ESMF, Environmental and social impact assessment and the environmental and social impact assessment (ESIA/ESMP) as contained in the C-ESMP and the OHSP.

Stakeholders Capacity building

To ensure a satisfactory management of the environmental and social risks, the ESMF recommends capacity building based on an assessment of the capacity needs of the institutions concerned. The training modules will include:

- World Bank's Environmental and Social Standards
- Environmental and Social Assessments, including environmental and social assessment procedure of sub-projects
- Grievance Mechanism including procedures for reporting and managing SEA/SH complaints
- Labor management procedures
- Gender?
- Inclusive and participatory stakeholder engagement
- Health and Safety and Social and Environmental Management

Stakeholder consultations, Participation and inclusion

As part of the stakeholder engagement, the communities living in the project area were consulted in groups or on a one-on-one basis. These consultations, which covered disadvantaged or vulnerable individuals or groups including women, allowed stakeholders to be informed about the project and gave them the opportunity to express their views about the project including its potential risks.

In addition to consultations with mixed groups, meetings were conducted with women's only group facilitated by a female member of the consulting team. These consultations helped highlight the special concerns of this group and the proposed measures that could address them.

During the consultations, the communities and other stakeholders welcomed the project and expressed the hope it will bring an end to the annual floods, the transportation difficulties in their localities, improved waste management and possible employment opportunities especially for the youth. The following were some of the points raised during the community consultations.

- (i) Fear of people losing their land and not be compensated
- (ii) The need for a fair and equitable compensation taking into account land scarcity and the high cost of land in GBA;
- (iii) The need for proper waste management and removal of obstructions such as buildings in the flood path to minimize flooding
- (iv) Opportunities for youth employment;
- (v) Discrimination of women in accessing project benefits such as training and credit facilities
- (vi) Support for women who lose the land they grow rice and vegetables to feed their families

The communities were informed that any involuntary land acquisition for the project will be fully compensated at replacement cost to ensure a fair and equitable compensation. Furthermore, the affected persons can take up any complaints they may have, including the compensation process and amount of compensation, to the project's grievance mechanism (GM) which will be set up before the start of the civil works. As regards employment at construction sites, the contractor will be encouraged to employ local labor if they have the required skills for the jobs. In addition, the project will be implementing small-scale livelihood improvement subprojects, which will provide opportunities for community workers. On discrimination of women, the community was reassured that the project has a special focus on women especially those who might be negatively impacted by the project.

The consultations were documented and an attendance register opened to record the participants at the meetings. The stakeholders consulted included government officials, local communities, and local government authorities. A total of 138 people were consulted and 53.6% or 74 of the people consulted were women.

Grievance Mechanism (GM)

Grievances resulting from project activities will be resolved using the project GM as defined in the Stakeholder Engagement Plan (SEP). The GM consists of a three-tier system: (i) local community level; (ii) project level grievance mechanism; and (iii) national judicial level. The procedure is that a project affected person (PAP) should first raise a complaint at the local level where the local Grievance Resolution Committee (GRC) will address the complaint. If the complaint is not resolved at this level, it is referred to the GRC at project level. If the GRC cannot resolve the complaint, the complainant can take up the matter with the

Project Steering Committee that will review the decision of the GRC. If this proves unsuccessful, the complainant can proceed to the judicial/legal system as provided for in the laws of The Gambia.

For complaints relating to SEA/SH, the procedure of receiving and treating them is defined in the SEP. It will be different from the procedure for general complaints outlined above and will follow a survivor-centered approach, and the anonymity of the survivor will remain intact, with the confidentiality of the survivor’s express consent. The involved parties will not have their security breached. A mechanism in the form of **SEA/SH Compliance Team** will be set up to manage cases of SEA/SH as well as issues related to violence against children (VAC).

Monitoring and evaluation

Monitoring and evaluation (M&E) will be carried out throughout the project cycle to ensure that project activities comply with the relevant E & S instruments. The provisions for monitoring and evaluation (M&E) will ensure that the proposed actions are implemented as intended and within the timelines established, and that, the expected results are achieved. Where shortcomings or problems are found, M&E can initiate appropriate corrective actions.

The environmental and Social Specialists and the gender-based violence (GBV) specialist within the PIU will be responsible for the internal monitoring and the National Environment Agency (NEA) will be responsible at national level. The reports of the monitoring will be sent to the PIU and the World Bank.

There will be an Environmental, Social and Health and Safety Audit every 6 months during project implementation and once year during operation. The final audit should preferably take place before the end of the financial commitments to the program. This will allow the flexibility to undertake any corrective action that the auditors may recommend before the project completion.

Budget

The estimated cost for the implementation of the ESMF including the capacity building is **277,000.00 USD (Two Hundred and Seventy Seven Thousand USD)** as detailed in the table below.

Activities	Quantity	Unit cost	Total cost US\$
Institutional measures			
1. Recruitment of Specialists in Environmental and Social Safeguards, Gender and GBV, Stakeholder Consultation and Communication Consultant, and OHS consultant	5	-	Included in PIU cost
2. Monitoring of the implementation of the project’s environmental and social instruments by NEA (provision of logistics support based on the signed Memorandum of Understanding)	5	3,000	15,000
E&S measures			
1. ESMF National Outreach Workshop	01	01	5 000
2. Screening of sub-projects	PIU	PIU	PIU
3. Completion and implementation of ESIA/ESMPs after validation by the NEA	Contractor	Contractor	Contractor
4. Preparation of the ESIA/ESMPs for specific sites	2	75,000	150,000
5. Ongoing monitoring of ESMP implementation by Environmental and Social Safeguards Specialists	PIU	PIU	PIU

Activities	Quantity	Unit cost	Total cost US\$
6. Evaluation (mid-term and final) of the implementation of the ESMF	02	20,000	40,000
Training/Awareness			
1. -Module on GBV/SEA/SH/VAC risk for PIU staff, project workers and beneficiary communities -Occupational Health and Safety Module-Contracted and supply workers	02	5 000	10, 000
2. Training on the World Bank's environmental and social standards –for PIU staff and contractors and implementing partner agencies ((e.g. contractors to understand the C-ESMP and its implementation)	03	5 000	15, 000
3. Capacity building for all stakeholders on GM, SEA/HS, basic environmental actions to improve their surrounding, skills training etc.	05	5,000	25,000
Implementation of the GM Action Plan			
1. Selection and training of Grievance Resolution Committees	1	5000	5000
2. Organization of awareness raising campaigns and popularization of the GM to stakeholders in the communes of intervention	3	2500	7000
3. Support for the operation of local management committees	2	2500	5000
TOTAL			277,000.00

1. INTRODUCTION

The Government of The Gambia is preparing, with the financial support from the World Bank, the West Africa Coastal Areas Resilience Investment Project 2(WACA ResIP2). The Project is a regional project and the Project Development Objective (PDO) is to ‘strengthen the resilience of targeted communities and areas in coastal Western Africa’. The Ministry of Environment, Climate Change and Natural Resources (MECCNAR) will implement the project through its Central Project Coordination Unit.

1.1 Project Objectives and components for The Gambia

In The Gambia, the Project will support targeted institutional strengthening and policy frameworks around flood and coastal risk management, and more generally disaster and climate risk management, integrated coastal development, as well as urban resilience. The project will seek to:

- (a) Support the mainstreaming of disaster risk reduction and climate change in key sectors;
- (b) Strengthen institutional capacities for effective and streamlined climate change and disaster risk reduction (DRR) responses
- (d) Improve the quality of hydro-meteorological services and early warning systems
- (e) Reduce pollution from uncontrolled storm water runoff;
- (f) Improve public health conditions; and
- (g) Improve accessibility/connectivity avoiding traffic disruption.

In The Gambia, the project is made up of four (4) components as indicated below:

~~**Component 1: Strengthen Regional integration.** The objective of the regional integration component is to strengthen the effective coordination of interventions for coastal resilience in West Africa at the regional and national levels. This will be achieved through the consolidation of the regional institutional set up and harmonization of policy, to seek economies of scale and the development of new strategic partnerships needed for the scale-up of response to the coastal resilience development challenge.~~

Component 2: Strengthening the policy or institutional frameworks. This component will support the strengthening of targeted institutional and policy frameworks around flood and coastal risk management, integrated flood management, integrated coastal development, natural resource management, urban resilience in The Gambia. Three areas have been identified: (a) support in mainstreaming disaster risk reduction and climate change in key sectors (e.g. Urban development), (b) strengthening institutional capacities for effective and streamlined climate change and disaster risk reduction (DRR) responses; and (c) improving the quality of hydro-meteorological services and early warning systems.

This component will also support the development of policy frameworks around transboundary coastal zone management, specifically as it relates to the use and management of shared resources along The Gambia’s borders with Senegal.

Component 3: Strengthening Physical and social investments.

Sub-component 3.1-This sub-component will finance site-specific interventions for coastal protection and/or flood control to reduce risks of flooding and/or erosion in the Greater Banjul Area (GBA), home

to 25 percent of the country population and 45 percent of GDP. The project is expected to finance a mix of gray, green, and hybrid infrastructure solutions along the selected prioritized Kotu Stream hotspot to reduce risks of flooding and erosion. Green or nature-based solutions include but not limited to retention ponds/tanks/wetlands/parks, water squares/sunken plazas, (bio)swales, sidewalk planters, green roofs, soak ways, water harvesting, green infrastructure/planting, urban gardens, submerged native aquatic vegetation, and mangrove protection to serve as a buffer to inundation and sea-level rise. Potential grey solutions include small-scale localized infrastructure such as constructing primary and secondary drainage systems and widening the Kotu Stream banks for mitigating erosion and urban flood risk and building bridges to serve as crossing point along the project site for enhancing community access, while hybrid solutions incorporate both approaches depending on site-specific needs and characteristics. Feasibility and design studies for the intervention will also be supported by this component.

Sub-component 3.2: This subcomponent will support targeted communities in area(s) of intervention to not only benefit as much as possible from the physical infrastructure and potential job opportunities for instance, but also contribute to their sustainable management (operation and maintenance). This subcomponent will support interventions for social development and economic recovery based on the needs of affected urban and coastal communities. This will involve working with communities on nature protection and conservation, alternative livelihoods and improvement of solid waste management to improve health conditions and reduce flooding and build up resilience to climate change.

Component 4: National Coordination. This component will finance project management costs including environmental and social risk management as well as monitoring and evaluation. This includes support to the Project Implementation Unit (PIU), the National Steering Committee and the National Technical Committee. Component 4 will also support the development of robust communication tools and plans, including a program for awareness raising and training related to the anthropogenic impacts on coastal areas, ecosystems, and climate.

1.2 Project Beneficiaries

Project beneficiaries include:

- The communities, including women and youth, living in the Kotu Stream catchment area who are victims of regular flooding and erosion resulting in the destruction of properties and life
- Technical Government agencies such as the National Disaster Management agency, the Meteorology and Hydrology Services that will benefit from capacity strengthening programs for effective and streamlined climate change and disaster risk reduction (DRR) responses as well as the Department of Physical Planning and Ministry of Transport, Works and Infrastructure and the Ministry of Gender and Children, Ministry of Tourism
- Select local community beneficiaries of social subprojects to support livelihood improvement and build resilience to climate change
- Hotels in the tourism area along the coast such as Sunset Beach Hotel that suffer from fluvial erosion and pollution through an improved drainage system for the stream and waste management
- School children and sick people by improving communication and connectivity to schools and health centers especially during the rainy season

- Small traders and businesses such as women vendors, mechanics, carpenters etc. along the banks of the stream who will cease to suffer the negative impacts of annual flooding (loss of goods and business)
- Kanifing Municipality and the Brikama Area Council that will see improved waste management and savings in the amount spent on disaster relief in their communities.

1.3 Rationale of the ESMF

Implementation of some project's activities may have risks and impact on the environment and people. The management of environmental and social risks and impact will follow requirement of the relevant Environmental and Social Standards (ESSs) of the World Bank Environmental and Social Framework (ESF). The ESMF is an instrument that examines the risks and impacts when a project consists of a program and/or series of subprojects, and the risks and impacts cannot be determined until the program or subproject details have been identified. It sets out the principles, rules, guidelines and procedures to assess the environmental and social risks and impacts associated with the implementation of the project. It contains measures and plans to reduce, mitigate and/or offset adverse risks and impacts, provisions for estimating and budgeting the costs of such measures, and information on the agency or agencies responsible for addressing the environmental and social risks and impacts.

Once the site and technical designs of the proposed sub-project activities are known, the E&S screening process, as per the ESMF determine the site-specific environmental and social (E&S) instruments to be prepared.

The key measures set out in the ESMF will be included in the Project Implementation Manual (PIM) to ensure their implementation and monitoring.

In addition, the project has prepared the Stakeholder Engagement Plan (SEP), Labor Management Procedures (LMP), the Resettlement Policy Framework (RPF). Together with the ESMF, these documents will guide the management of potential environmental and social risks and impacts associated with the project.

1.4 Methodology

a) Scoping

A scoping meeting with the officials of the Ministry of Environment, Climate Change and Natural Resources (MECCNAR) to review and reach an understanding on the objectives of the mission, the key issues to be considered in the preparation of this document, the stakeholders to be consulted, and the documents to be consulted for the study (project documents, sectoral documents, etc.) was conducted.

b) Desktop Review

This consisted of reviewing relevant documentation (both print and electronic) made available by the client and other stakeholders and they include:

- The Project Appraisal Document (PAD);
- National legal and policy documents on environment management;
- Sectoral policy and regulatory instruments;
- World Bank's Environmental and Social Framework (ESF) including the Environmental and Social Standards (ESS), particularly ESS1, Assessment and Management of Environmental and Social Risks and Impacts²
- Guidance Notes for Borrowers –Environmental and Social Framework for IPF

². https://thedocs.worldbank.org/en/doc/837721522762050108_0290022018/original/ESFFramework.pdf

- Operations: ESS1, ESS2, ESS3, ESS5 ESS10 etc.³
- Borrowers Guidance⁴ Notes of the ESS's from the World Bank and other guidance such as the World Bank Good Practice Notes such as Addressing Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) in Investment Project Financing involving Major Civil Works,⁵, non-discrimination and persons with disability⁶, managing labor influx,⁷ and gender⁸.

c) Site visits and Consultations with potential project beneficiaries

These consultations helped to:

- Inform and discuss with the local communities the project and its potential environmental and social risks and impacts (both positive and negative);
- Provide an opportunity for the communities to express their views and concerns about the potential risks including land acquisition, physical and economic displacement, employment opportunities that occur during project implementation and the proposed measures to address these risks;
- Based on the discussions, identify specific concerns of the communities which the project will need to address to facilitate their participation and reduce the potential negative impacts on their lives and livelihoods.

The communities visited included- Bundung, Bakoteh, Kotu, Manjai, DippaKunda, Tippa-Garage and Sukuta. During these visits, which took place between April 13 to 29, 2022 the Consultant also met with women groups. To enable them express their views freely especially on issues such as inclusiveness, gender-based violence (GBV), sexual exploitation and abuse (SEA) separate meetings with women only groups were facilitated by a female member of the consulting team.

The consultations took place in conformity with the national and WHO Guidelines for the reduction of the spread of COVID-19 and the World Bank technical guidance note on consultations in times of COVID-19.

d) Key informant interviews

These consultations took the form of key informant interviews with representatives of relevant government agencies and NGOs. The list of the institutions and communities consulted is in **Annex 8a** and a summary of the stakeholder consultations is attached as **Annex 8b**. Select copies of the attendance registers are attached as **Annex 8c**.

³. <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-framework-resources#guidancenotes>

⁴ **Guidance notes for Borrowers:** <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework/brief/environmental-and-social-framework-resources#guidancenotes>

⁵ **Good Practice Note Addressing Sexual Exploitation and Abuse and Sexual Harassment in the Financing of Investment Projects involving Major Civil Works** : <http://pubdocs.worldbank.org/en/215761593706525660/ESF-GPN-SEASH-in-major-civil-works-English.pdf>

⁶ **Good Practice Note for Non-discrimination and Disability** : <http://pubdocs.worldbank.org/en/366051548972401439/ESF-Good-practice-note-disability-french.pdf>

⁷ **Assessing and Managing the Risks of Adverse Impacts on Communities from Project-Related Labor Influx** <https://thedocs.worldbank.org/en/doc/fc074f5b6cc1621dc65675bf83c9d0b8-0290032021/original/ESF-Labor-Influx-Good-Practice-Note.pdf>

⁸ **Good Practice Note for Gender** <http://pubdocs.worldbank.org/en/158041571230608289/Good-Practice-Note-Gender.pdf>

Chapter 2: Policy and Regulatory Frameworks

2.1 National Policy Frameworks

The national policies relevant to the environmental and social management of project activities are described in the **Table 2** below.

Table 2 – National sector policies relevant to environmental and social protection

Policy	Policy objectives	Relevance to the Project
National Disaster Management policy	Develop and strengthen institutional mechanisms and capacities to build resilience to hazards and assist communities to ensure that they are fully equipped to anticipate and respond to disaster events.	The policy will assist and guide on response mechanisms to the impacts of climate change induced hazards (sea-level rise, erratic rainfall, and flood).
National Climate Change Policy (2016 – 2025)	Policy provides the framework for managing climate risks, building institutional capacities, and opportunities for climate-resilient development	The Project will provide guidance on planning and building climate resilient infrastructure that takes account of national guidelines and standards
National Youth Policy (2009–2018)	Policy aims to mainstream youth issues into the advancement of all sectors	Provides a framework to engage the youth in the implementation of some of the proposed social development activities as well as waste management activities. Policy also promotes inclusiveness.
Gambia Environment Action Plan, GEAP II (2009-2018)	Provides a framework for an integrated environment and natural resources management	The Plan will provide guidelines on the management of the environmental and social risks of the project as well as the proposed conservation activities
National Forest Action Plan (2019-2028)	Provide framework for sustainable dryland forest management and make the forest sector more biodiversity-friendly, and socially beneficial.	Will provide guidance on the restoration and improvement of degraded land areas in the project zone and in the creation of parks
Gambia National Gender & Women Empowerment Policy (2010–2020)	Mainstream gender in national and sectoral planning and programming to ensure equity and equality	Women will be consulted widely and will be involved in the local monitoring and evaluation process during project implementation to ensure inclusiveness
The National Biodiversity Strategy and Action Plan (NBSAP), 2015	The NBSAP recognizes the conservation and sustainable use of biodiversity	An important planned project activity includes nature protection and conservation
National Strategic Environmental Assessment Policy (2017- 2021)	Aims to ensure environmental sustainability	Relevant in the proposed subprojects at community level
Decentralization Policy	Promotes development through the decentralized governance structures in areas such as natural resources and environment	The councils and Ward Development Committees (WDC) will play important roles in community mobilization and the implementation of the grievance mechanism. They

Policy	Policy objectives	Relevance to the Project
	management at the local and district levels	will also play significant role in the maintenance of infrastructures after construction.
Tourism Master Plan, 2006	The Tourism Development Master Plan provides a framework for the development of tourism in The Gambia in the short, medium and longer term	The project sites include part of the TDA and some of the planned activities might affect the tourism activities such bird watching. The guidelines of the policy on issues such as waste management, pollution of the stream and beaches by sewage discharge into the stream are important.
Agricultural and Natural Resources (ANR) Sector Policy (ANRP, 2017-2026)	Provides the framework for the development of the Agriculture sector in the medium-term.	Provides support and guidance on the livelihood support activities in project area such rice and vegetable growing along the banks of the stream
The Gambia Second Generation National Agricultural Investment Plan-Food and Nutrition Security (GNAIP II-FNS) 2019-2026	Provides the main investment framework for agricultural development in The Gambia in the medium term (2019-2026) with the aim of increasing food and nutrition security at household level.	Provides guidelines for small scale agricultural activities which may be supported by the project.

2.2 National Legal Frameworks

The national regulatory frameworks for social and environmental protection are presented in Table 3 below.

Table 3: National laws and regulations relevant to environmental and social protection.

LEGISLATION	DESCRIPTION	RELEVANCE TO THE PROJECT
National Environmental Management Act, 1994	Serves as the framework legislation for environmental control and management in The Gambia.	It is expected to guide development initiatives related to the environment of the project area
Environmental Impact Assessment (EIA) Regulations 2014	States the procedure for Screening if projects need an EIA, provides the Screening Form and outlines the content of the Environmental Impact Statement (EIS).	EIA Regulation is one of the main national guidelines for projects to follow in an attempt to avoid, minimize or mitigate any foreseen negative impacts
Environmental Protection (Prevention of Dumping) Act 1988	Makes provision for the prevention of the dumping of industrial waste.	The project communities need to be sensitized on this law since the dumping affects the stream as well as at the outlet where the stream empties into the sea.
Environmental Quality Standard Regulations, 1999	Sets out environmental quality standards for ambient air, saline waters, surface fresh waters and groundwater.	It is expected to guide operations during project intervention period in order to maintain the required environmental quality

Environmental Discharge (Permitting) Regulations,2001	Requires all industrial processes to apply for a permit to discharge their waste substances to the air, water or land.	This will guide all the discharges to the stream to be properly conducted in accordance with the law.
Waste management Bill, 1997	Addresses waste management and pollution issues	The Act will strengthen/ sensitize communities on consequences of indiscriminate dumping of waste in the stream and its environment
Marine Pollution Act, 2013	Provides for the prevention of marine pollution and the management of the marine environment in the territory of The Gambia.	The outlet of the Kotu stream is in the ocean, therefore any possible dumping in the in the marine environment could pollute the stream and vice-versa.
Anti-littering Regulation 2007	Provides for the sound management of litter in public places	Awareness of this law could help bring about behavioral change and minimize indiscriminate dumping of waste in the stream by the community.
Hazardous Chemicals and Pesticides Control, Management Act and Regulation 1994 and 1999 respectively	Provides for the sound management and control of the manufacture, distribution and use of hazardous chemicals and pesticides and to make provisions to matters connected with	Hazardous chemicals and pesticides may be used in some of the social projects including agriculture and natural resource management
Biodiversity		
Fisheries Act 2007 Fisheries Regulations,2011	Makes provision for the management and conservation of fisheries resources.	The intervention in and around the stream could affect and recover the management of fisheries resources by improving the spawning ground through mangrove restoration.
Biodiversity and Wildlife Act, 2003	Provides for the protection of biodiversity and the establishment of protected areas.	The stream is a hotspot for birdwatchers and the act will protect this sensitive area during project activities. The proposed nature conservation activities will also need to respect the provisions of this Act.
The National Parks and Wildlife Bill, 2013	To provide for the establishment, control and management of national parks and nature reserves and for the conservation and enhancement of wildlife ecosystems and biodiversity	This will complement the Biodiversity and Wildlife Act in protecting the Kotu Stream as an important area of biodiversity
Forestry Act,1998	The Act makes provision for the administration and management of state and private forests and for the declaration of protected forest areas.	Equally in support of the Biodiversity Act, the Forestry Act will consider protecting the mangroves along the stream and guide the project in any reforestation activity with the communities.
Public Health		

Hazardous Chemicals and Pesticides Control and Management Act , 1999	Provides protection to human health and the environment through the control of hazardous chemicals.	During project activities, use of hazardous chemicals if need be will be done in a way that people's health is considered and prioritized.
Hazardous Chemicals Regulations,1999	Regulations for the implementation of the Act, described above.	This will complement the gains of Hazardous Chemical and Pesticides Control and Management Act specifically related to the hazardous chemicals.
Public Health Act,1990	Promotes and preserves public health through the prevention and treatment of disease and the removal and correction of any condition that may be injurious to public health.	During project activities, Public Health Act will be relevant in the protection of communities from infectious disease such as COVID-19 and STIs
National Water Resources Council Act 1990	Establishes a National Water Resources Council (NWRC) to formulate a water policy for the nation of The Gambia.	The Act is relevant in the context of the protection of ground water resources from pollution
National Disaster Management Act ,2008	Provides for an integrated and coordinated disaster management that focuses on prevention, preparedness, response, mitigation and recovers from disasters or emergency situations, and the management of their effects.	The act will help guide and support communities in managing disasters during project intervention.
Social		
Local Government Act and Regulations ,2002	Establishes and regulates a decentralized local government system for The Gambia; to make provision for the functions, powers and duties of local authorities.	Implementation of the project will require the participation of the decentralized structures- Office of Governor West Coast Region (WCR), KMC, BAC, Ward Development Committees (WDC) etc. The Act will serve as a guide for engaging the local authorities.
Gambia Children Act, 2005	Prohibit the engagement of a child in exploitative labor and hazardous work, or labor that deprives the child of his or her health, education or holistic development	This Act is relevant because of the potential risks of child labor
Gambia Labor Act, 2007	Provide for the administration of labor, the recruitment and hiring of labor, the protection of wages, and the registration of trade unions and employer organizations and for matters connected therewith.	This is expected to guide the recruitment and management of labor, protect the rights of workers and ensure safe working environment throughout project implementation.
Tourism Authority Act	To promote and regulate the tourism industry in order to increase tourist arrivals and create a conducive environment for the development of the sector	The project site is part of the TDA and activities might affect tourism activities e.g. hoteliers and birdwatchers. As a result, considering Tourism Authority Act guideline is paramount.

Physical Planning and Development Control Act 1991; and Development Control Regulation,1995	Provide the preparation of layouts and effective development control mechanism particularly buildings and, this regulations must be followed by all developers	The project has civil works which may result in resettlement. This act will be relevant in trying to resettle people affected by the project (PAP)
Land Acquisition and Compensation Act,1991	This Act guides the Government when private land is required for public use. Any private land acquired for public use must be adequately compensated.	The project will entail expansion/widening of the stream which will private structures and land. The Act will guide in the relocation and compensation of affected individuals.
National Council of Arts and Culture Act, 2003	The Act seeks to preserve, promote and develop Gambian arts and culture.	As cultural artefacts may be discovered during the civil works, the provision of the Act provides the procedure to follow to ensure preservation of the find.
Sexual Offences Act, 2013	Updates the law and procedures regarding the trial of rape, sexual offences, and related matters	This Act is relevant to the Project due to the need for the protection of vulnerable persons, particularly women and girls against sexual abuse and exploitation and sexual harassment
Criminal Code (2007)	Define the repressive criminal acts and also the procedures for trial, especially for cases regarding violence against women and children.	The criminal code provides for traditional offences to sexual violence against women such as rape. According to section 122, the maximum punishment for rape is life imprisonment, and the maximum punishment for attempted rape is 7 years.
State Lands Act, 1990	Defines all land that belongs to the state (State Lands) and are administered by the state.	Some of the land in the project area may be part of the state lands and therefore the provisions of this Act apply
Gambia Roads Technical Services Authority Act, 2003	Grants National Roads Authority the responsibility for the construction, maintenance and safety of the national road network, including feeder roads	The design of any of the road and bridges to be constructed in the project area will have to abide by the provisions of this Act
Mines and quarries Act, 2005	The Act makes provision for prospecting for minerals, carrying out mining and quarrying operations including gravel, sand, and for connected matters	Construction of drainage and other civil works during project implementation will require quarries for sand and gravel aggregates and the provisions of the Act will apply.
People with Disability Act 2020	The Act provides for the health care, social support, accessibility, rehabilitation, education and vocational training, communication, employment and work protection and promotion of basic rights for persons with disabilities.	The Act is relevant to ensure equality and non-discrimination of persons with disability when it comes to accessing project benefits, including employment opportunities and participating in the stakeholder consultations and decision-making

2.3 International legal conventions

In addition to the national laws there are also international conventions to which The Gambia is a signatory and as such it is under obligation to respect the provisions of such conventions.

Table 4: International conventions relevant to environmental and social protection

CONVENTION AND DATE OF RATIFICATION	DESCRIPTION	RELEVANCE TO THE PROJECT
Abidjan Convention and its related protocols e.g. Protocol on land based sources of marine pollution, Ratified December 1984	The Convention promotes the protection and development of the marine and coastal Environment of West, Central and Southern African Region.	This Convention is relevant because addressing pollution in the project area one of the aims of the project.
Convention on Conservation of migratory species of Wild Animals Ratified September 1996	The Convention provides a global platform for the conservation and sustainable use of migratory animals and their habitats.	The intervention site is home to different bird species and one of the Gambia hotspot for birdwatchers. In addition, part of the area is a potential fish breeding ground because of the presence of mangroves. This Convention is therefore relevant
Convention on Biological Diversity (CBD), Ratified June 1994	The convention has three main goals: the conservation of biological diversity; the sustainable use of its components; and the fair and equitable sharing of benefits arising from genetic resources.	Conservation of biological diversity as one of the goals of the Convention is relevant since the project intervention area is rich in biodiversity and some of the proposed subproject activities at community level will address natural resources conservation.
UN Framework Convention on Climate Change (UNFCCC)–Ratified November 2016	It aims to stabilize greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system	This Convention is relevant because of the potential impact of climate change on the project area.
United Nations Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW) and the Optional Protocol to the Convention on the Elimination of All Forms of Discrimination against Women (OP-CEDAW)-Ratified in April 1993	Convention highlights the right of women to own, manage, enjoy and dispose of the property as central to their financial independence and may be critical to their ability to earn a livelihood and to provide adequate housing and nutrition for themselves and their children	Women are the main targets of the Project and are likely to suffer more from the negative impacts of acquisition vegetable and rice fields. There will therefore be a need to ensure that they have access to the benefits of this Project in keeping with the national commitments under this convention.

United Nations Convention on the Rights of the Child – Ratified November 1989	Sets out the civil, political, economic, social, health, and cultural rights of children. Other rights in the treaty include the right to education, the right to play, the right to respect for privacy and family life	Access to education by children during rainy season is difficult because of poor communication. The commitment under this Convention is important for the proposed project activities
The Convention Concerning the Protection of the World's Cultural and Natural Heritage (1972) Ratified 1987	Convention aims to identify and protect the world's natural and cultural heritage considered to be of outstanding universal value	Project implementation could potentially impact natural or cultural sites such as old graves, or other cultural relics

2.4 World Bank Environmental and Social Framework (ESF)

The World Bank Environmental and Social Framework sets out the Bank's commitment to sustainable development and the Bank's Environmental and Social Standards set out the obligations of the Borrower in ensuring sound management of the environment and social risks of projects throughout project implementation. There are ten (10) Standards and eight of these apply to the project as shown in the table below.

Table 5: World Bank Environmental and Social Standards relevant to the project

Environmental and Social Standard (ESS)	Environmental and or Social aspects covered	Relevance to the project
ESS 1: Assessment and management of environmental and social risks and impacts	The ESS 1 sets out the Borrower's responsibilities to assess, manage, and monitor the environmental and social risks and impacts associated with each stage of a project financed by the Bank through Investment Project Finance (IPF), to achieve environmental and social outcomes consistent with the ESS.	As a new project, ESS1 applies to assess, manage and monitor the potential environmental and social risks and impacts of the project. In this regard, the project has to prepare some environmental and social instruments, including the ESMF will provide guidance for the E&S screening and definition of E&S instruments that will be prepared The project ESCP is also prepared and contains commitments of the government of the Gambia regarding E&S risks and impacts' management under this project.
ESS 2: Labor and Working Conditions	This standard addresses the use and management of labor in projects to promote constructive relationships between project workers and the management ensuring fair treatment of workers and provision of safe and healthy working conditions	The implementation of the project will require the use of labor so the provisions of ESS 2 apply to the requirements for fair treatment of workers and ensuring safe and healthy working conditions. Labor management procedures (LMP) have been prepared to address labor issues for all

		categories of workers that will be recruited under this project.
ESS 3: Resource Efficiency and Pollution Prevention and Management	The ESS describes the requirements for addressing resource efficiency, pollution prevention and management throughout the life cycle of a project	The project civil works will require the use of resources with potential risks of environmental pollution. The provisions of ESS3 regarding efficiency use of resources including waster, energy, pollution prevention, including waste management will be addressed in the ESMF has and specific instruments (ESIA/ESMP)
ESS 4: Community Health and Safety	This standard addresses the risks and impacts on the safety, security, and health of project-affected communities, especially the vulnerable groups and individuals	The potential risks and impacts of the project on the communities will be identified in the present ESMF and the mitigation measures proposed to address these risks including the risk of sexual exploitation and abuse.
ESS 5: Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement	This standard addresses the potential risks and impacts resulting from land acquisition, restriction of land use and involuntary resettlement.	The civil works such as the expansion of the main and secondary drains and the expansion of the banks of the stream may require land which makes this standard relevant. The Resettlement Action Plans (RAPs) to be prepared in line with ESS 5 will address these risks.
ESS 6: Biodiversity Conservation and Sustainable Management Living Natural Resources	The standard provides for the protection and conservation of biodiversity, and the sustainable management of living natural resources. It also recognizes the importance of conserving the key ecological functions of habitats, including forests, and the biodiversity they support.	Some project areas are important feeding grounds for migratory birds and the estuary area of the stream is important as fish spawning grounds in addition to the different types of reptiles that live in the project area which make this standard relevant. Measures for biodiversity protection will be included in the ESMF and site specific instruments (ESIA/ESMP) in line with the requirement of ESS6
ESS 8: Cultural heritage	This standard aims to protect cultural and it sets out measures designed to protect cultural heritage throughout the life of a project	This standard is relevant because the project includes civil works during which some archaeological or cultural remains may be accidentally discovered. The ESMF provides for the protection of cultural sites and potential archaeological finds by applying chance finds procedures in line ESS 8.

<p>ESS 10: Stakeholder engagement and information Disclosure</p>	<p>The Standard calls for open and transparent and inclusive consultations between the Borrower and project stakeholders to ensure their views and concerns are taken into account in the design and implementation of the project to help to promote environmental and social sustainability of the project.</p>	<p>ESS 10 is relevant and in all World Bank-financed projects, the borrower (the Government of The Gambia) has developed a stakeholder engagement plan (SEP) commensurate with the nature, scope and potential risks and impacts of the project.</p> <p>A project GM is included in the SEP to manage all project related complaints</p>
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2.5 World Bank Environment, Health, and Safety Guidelines (EHSG)

These are technical reference documents, with general and industry specific examples of Good International Industry Practice (GIIP).

The World Bank Group Environmental, Health and Safety Guidelines (EHSGs) are technical reference documents, with general and industry specific examples of Good International Industry Practice (GIIP). In applying the EHS Guidelines, the proposed measures should be tailored to the hazards and risks identified for each specific subproject activity based on the results of an environmental assessment in which site-specific variables, such as host country context, assimilative capacity of the environment, and other project factors, are considered.

The following EHSG of the World Bank will be relevant to this project:

Environment:

Air emissions and ambient air quality. This guideline applies to facilities or projects that generate emissions to air at any stage of the project lifecycle. It complements the industry-specific emissions guidance presented in the Industry Sector Environmental, Health, and Safety (EHS) Guidelines by providing information about common techniques for emissions management that may be applied to a range of industry sectors. This guideline provides an approach to the management of significant sources of emissions, including specific guidance for the assessment and monitoring of impacts. It is also intended to provide additional information on approaches to emissions management in projects located in areas of poor air quality, where it may be necessary to establish project-specific emissions standards. Construction of drainages and rehabilitation of bridges and culverts to be undertaken under the project are expected to generate some level of dust.

Energy Conservation: This guideline applies to facilities or projects that consume energy in process heating and cooling; process and auxiliary systems, such as motors, pumps, and fans; compressed air systems and heating, ventilation and air conditioning systems (HVAC); and lighting systems. It complements the industry specific emissions guidance presented in the Industry Sector Environmental, Health, and Safety (EHS) Guidelines by providing information about common techniques for energy conservation that may be applied to a range of industry sectors. It provides guidelines on energy management programs as well as energy efficiency.

Wastewater and Ambient Water Quality: This guideline applies to projects that have either direct or indirect discharge of process wastewater, wastewater from utility operations or storm water to the environment. It is also applicable to industrial discharges to sanitary sewers that discharge to the environment without any treatment. It provides information on common techniques for wastewater management, water conservation, and reuse that can be applied to a wide range of industry sectors. This

guideline is to be complemented by the industry-specific effluent guidelines presented in the Industry Sector Environmental, Health, and Safety (EHS) Guidelines. Projects with the potential to generate process wastewater, sanitary (domestic) sewage, or storm water should incorporate the necessary precautions to avoid, minimize, and control adverse impacts to human health, safety, or the environment.

Contaminated Land: This guideline provides a summary of management approaches for land contamination due to anthropogenic releases of hazardous materials, wastes, or oil, including naturally occurring substances. Releases of these materials may be the result of historic or current site activities, including, but not limited to, accidents during their handling and storage, or due to their poor management or disposal.

The guideline recommends that contamination of land should be avoided by preventing or controlling the release of hazardous materials, hazardous wastes, or oil to the environment. When contamination of land is suspected or confirmed during any project phase, the cause of the uncontrolled release should be identified and corrected to avoid further releases and associated adverse impacts. Contaminated lands should be managed to avoid the risk to human health and ecological receptors. The preferred strategy for land decontamination is to reduce the level of contamination at the site while preventing the human exposure to contamination.

Hazardous material Management. These guidelines apply to projects that use, store, or handle any quantity of hazardous materials, defined as materials that represent a risk to human health, property, or the environment due to their physical or chemical characteristics. These products can be classified as explosives; compressed gases, including toxic or flammable gases; flammable liquids; flammable solids; oxidizing substances; toxic materials; radioactive material; and corrosive substances. The potential use of chemicals products like fuel, gas, etc. in the civil works makes this guideline relevant to the project.

Waste Management. These guidelines apply to projects that generate, store, or handle any quantity of waste across a range of industry sectors. It is not intended to apply to projects or facilities where the primary business is the collection, transportation, treatment, or disposal of wastes. Construction and rehabilitation works of the project are expected to generate waste at various sites which make these guidelines relevant to the project.

Noise Management. This guideline addresses impacts of noise beyond the property boundary of the facilities or where projects are being implemented. Thus, it seeks to address the public health risks of noise generated from the project. The use of the handheld compactor at both the feeder roads.

Occupational Health and Safety:

This guideline provides guidance and examples of reasonable precautions to take in managing principal risks to occupational health and safety. Although the focus is placed on the operational phase of projects, much of the guidance also applies to construction and decommissioning activities. Labor intensive public works at project sites, such as land clearing, excavation, hauling, etc. expose workers to occupational risks. The EHS Guidelines will help manage such risks.

Community Health and Safety. Specific guidelines provided under traffic safety, water quality and availability, disease prevention and construction and decommissioning presented in these guidelines are relevant to implementing sub-project activities at community level as well as rehabilitation/construction activities. The project management should put in place appropriate measures to prevent the spread of COVID-19 by applying WHO and national guidelines reduce the spread of COVID-19 virus and other infectious diseases. Additionally, the project should put in place a mechanism to promote a healthy and safe environment for all, including beneficiaries.

2.6 Comparison of the Gambia's Regulations/ Policies and World Bank ESF for Handling Environmental and Social Risks

The national laws on the management of environmental and social risks of projects are similar in many respects to those of the World Bank Standards, even though some major difference exist between the two frameworks. The table below is a comparative analysis of the Gambian regulations and those of the World Bank standards.

Table 6: Gap Analysis – Comparison of Gambia’s regulations and World Bank ESS for handling environmental and social risks

Scope/Objective	Description of Bank Standard	Description of the National Regulations	Gaps and Bridging Actions
Assessment and management of environmental and social risks and impacts	<p>ESS1 requires assessment of environmental and social risks and impacts by adopting mitigation hierarchy approach to:</p> <ul style="list-style-type: none"> • Anticipate and avoid risks and impacts • Where avoidance is not possible, minimize or reduce risks and impacts to acceptable levels • Once risks and impacts have been minimized or reduced, mitigate and • Where significant residual impacts remain, compensate for, or offset them, were technically and financially feasible. 	<p>National Environmental Management Act, 1994 and the Environmental Assessment. Regulations (EIA) of 2014 also requires an assessment to determine the potential adverse effects on the environment or public health</p>	<ul style="list-style-type: none"> - Although national legislation seeks to anticipate and mitigate/avoid risks and impacts, it does not adequately take into account the social and gender issues particularly impacts on the vulnerable groups - Capacity building of the stakeholders particularly PIU staff and partners on World Bank ESF are important under the ESF - The provisions of ESS 1 will apply
Promotion of health and safety at work, fair treatment, non-discrimination, and equal opportunity for project workers including vulnerable workers such as women, persons with disabilities.	<p>ESS 2 addresses labor and working conditions and lays down specific conditions to meet such as transparency and lack of discrimination in employment opportunities, provision of a grievance mechanism for workers to raise their complaints.</p> <p>Project workers have the right to report work situations that they believe are not safe or healthy and remove themselves from a work situation that they have reasonable justification to believe presents an imminent danger to</p>	<p>The Labor Act 2007 provides for the rights and duties of employers and workers, guarantees trade unions the freedom of associations, and establishes Labor Commission to mediate and act in respect of all labor issues. The Labor Act provides for compensation payments to workers for personal injuries arising out of and in the course of their employment.</p> <p>Labor Act 2007 details the duties of persons employed. It is not part of the duties of persons employed to remove themselves from such unsafe working places.</p>	<p>The ESS2 and the Labor Act share many points in common such as right to form trade unions, prohibition of child labor etc. However, there is no provision in the national laws that requires employers to adopt anti-sexual harassment policies.</p> <p>The law does not explicitly mandate workers to remove themselves from working conditions that they consider unsafe without the risk of reprisal. The provisions of ESS 2 will apply to the project</p>

Scope/Objective	Description of Bank Standard	Description of the National Regulations	Gaps and Bridging Actions
	their life or health without fear of retaliation.		
Resource Efficiency and pollution prevention and management to achieve the sustainable use of resources	The ESS3 provides requirements for projects to achieve the sustainable use of resources, including energy, water, and raw materials, as well as implement measures that avoid or reduce pollution resulting from project activities. The standard places specific consideration on hazardous wastes or materials and air emissions (climate pollutants).	<ul style="list-style-type: none"> The NEMA and the EIA regulations and procedures, Anti – littering Regulations and Discharge Permit regulations, provides for prevention and management of the risks of pollution. <p>The Act also provides for the registration and management of all pesticides to ensure that the approved ones are used.</p> <p>The Hazardous Chemicals and Pesticide Management Act, 1999 provides for the registration and use of pesticides and related matters.</p>	The Legislation ensures that pollution is prevented, and measures are put in place by polluters through routine monitoring by regulatory agencies and institutions i.e., NEA, etc. There are no gaps
Community health and safety of project-affected communities during the project lifecycle	ESS4 recognizes that project activities, project equipment and infrastructure increase the exposure of project stakeholder communities to various health, safety and security risks and impacts and thus recommends that projects implement measures that avoid or limit the occurrence of such risks. It provides further requirements or guidelines on managing safety, including the need for projects to undertake safety assessment for each phase of the project, monitor incidents and accidents and preparing regular reports on such monitoring. ESS4 also	The Public Health Act provides for the prevention of disease, promotes, safeguards, and maintains and protects humans and animals' health and provides for related matters. The Act enjoins the provision of sanitary stations and facilities, destruction of vectors including mosquitoes, protection of water receptacles, and promoting environmental health and sanitation.	<p>The Act does not consider the assessment workplace safety. Additionally, no adequate measures are in place to deal with occurrences and emergencies.</p> <p>ESS4 provides the platform to engage with stakeholders. A Stakeholder Engagement Plan has been prepared and will be implemented prior to the start of project activities. Community needs concerning project activities will be assessed and necessary measures are taken. The project will take into consideration emergency and COVID-19 Response Plan to guide project implementation on site.</p> <p>The provisions of ESS4 will apply</p>

Scope/Objective	Description of Bank Standard	Description of the National Regulations	Gaps and Bridging Actions
	guides emergency preparedness and response.		
Land Acquisition, restriction on land use and involuntary resettlement	<p>ESS5 aims to avoid involuntary resettlement, forced eviction, and aims to mitigate unavoidable adverse social and economic impacts from the land acquisition or restrictions on land use -</p> <p>PAPs with the formal legal rights to land or assets have to be compensated for any losses.</p> <p>-PAPs who do not have formal legal rights to land or assets but have a claim to land or assets that is recognized under national law, including claims derived from customary or traditional tenure arrangements are eligible for compensation.</p> <p>- PAPs with no recognizable legal right or claim to land or assets are compensated for loss of non-land assets and provided with resettlement assistance.</p>	<p>Provides for compulsory acquisition of land for public purpose and subsequent payment of compensation but only provides for compensation of assets.</p> <p>-Recognizes only PAPs with legal title for compensation</p> <p>- Use of the legal system to address grievance/complaint</p> <p>-Squatters are not entitled to compensation.</p>	<p>Gaps:</p> <ul style="list-style-type: none"> - The rights of squatters are not recognized. - No requirement of GM to address grievances - No requirement to prepare RAP <p>To address these gaps, the ESS5 will apply.</p>
Biodiversity conservation and sustainable management of living resources	<p>ESS6 promotes the conservation of biodiversity or natural habitats and supports the protection and maintenance of the core ecological functions of natural habitats and the biodiversity they support.</p> <p>It also encourages projects to incorporate into their development, environmental and social strategies that</p>	<p>The Forest Act and Biodiversity and Wildlife Act aim at the conservation and sustainable development of forest and wildlife resources for environmental sustainability and continuous supply of ecosystem services whilst fulfilling Gambia's commitments under international agreements and conventions.</p>	<p>There are no major gaps between national legislations and ESS6</p>

Scope/Objective	Description of Bank Standard	Description of the National Regulations	Gaps and Bridging Actions
	<p>address any major natural habitat issues, including identification of important natural habitat sites, the ecological functions they perform, the degree of threat to the sites, and priorities for conservation.</p>		
<p>Protection of cultural heritage from the adverse impacts of project activities and support its preservation.</p>	<p>ESS 8 takes into account direct, indirect, and cumulative risks and impacts on tangible or intangible cultural heritage. Impacts on cultural heritage are to be avoided and the mitigation hierarchy applied. A chance finds procedure will be applied to ensure that any cultural heritage discovered during the works is appropriately managed.</p>	<p>Both the Constitution (1997) and National Council of Arts and Culture ACT (1989) recognize culture as a necessary tool for national integration and development. The State shall take steps to shall foster the development of Gambian culture in all its forms.</p>	<p>ESS8 provides for the preparation of frameworks for managing biodiversity resources and cultural heritage in situations where these resources are likely to be adversely affected by project activities.</p> <p>The provisions of ESS 8 will apply</p>
<p>Stakeholder Engagement and information disclosure</p>	<p>ESS 10 establishes a systematic approach to stakeholder engagement that helps the Borrower to identify stakeholders and build and maintain a constructive relationship with them; as well as disclose information on the environmental and social risks and impacts to stakeholders in a timely, understandable, accessible, and appropriate manner and format. Stakeholder engagements are to commence as early as possible in the project development process and continued throughout the lifecycle of the Project.</p> <p>ESS 10 also provides for a grievance mechanism to receive and facilitate the resolution of concerns and grievances.</p>	<p>The 1997 Constitution provides for consultations for people whose land may be compulsorily acquired by the state for public use</p> <p>Gambia Environmental Assessment Regulations (2014) and National Environmental Management Act (NEMA), also consider stakeholder engagement is an integral part of the Environmental Impact Assessment process.</p>	<p>The national laws do not give a clear procedure for systematic consultation of stakeholders and information disclosure. The laws do not make specific reference to the need for vulnerable groups to be consulted.</p> <p>The acts do not include a GM for addressing complaints and grievances that the stakeholders may have in respect of the information provided.</p> <p>Under national laws stakeholder engagement is not a continuous activity throughout project implementation</p> <p>The provisions of ESS10 shall apply</p>

2.8 Institutional framework

For the implementation of the environmental and social measures, the main institutions involved and their responsibilities at national, regional, community levels are presented below.

i) National Level

At the national level, the following agencies will be involved:

a) Ministry of Environment, Climate Change and Natural Resources

This Ministry, which oversees the project, will host the Project Implementation Unit (PIU) and is also responsible for policies relating to environment protection.

b) GAMWORKS

This institution will provide the necessary support to the PIU to ensure compliance of Contractors with regard to health and safety and social and environmental management during implementation of component 3 of the project.

c) Ministry of Lands, Regional Governments and Religious Affairs

As explained above, the Ministry of Lands, Regional Governments and Religious Affairs is the apex institution responsible for land administration in the country and it is the custodian of all land-related legislation (including the Land Acquisition and Compensation Act, 1991). Matters relating to compulsory land acquisition will be processed through the Ministry.

d) Technical Departments of the Ministry of Lands, Regional Governments and Religious Affairs

The technical departments of the Ministry namely: Department of Lands and Surveys and the Department of Physical Planning and Housing will be consulted by project for technical advice and guidance on land related issues and help in identifying suitable for resettling PAPs.

e) National Environment Agency (NEA)

The NEA is responsible for environmental management in The Gambia, and it prescribes standards and guidelines relating to environmental protection and/or pollution with the support of the Technical Advisory Committee. It may, by notice in writing, direct any developer carrying on any project to submit an Environmental Impact Assessment covering the project. In this project, the NEA will be responsible for approving the scope and hence TORs for the environmental assessment and review any ESMP developed for the Project. They will also be responsible along with the PIU for monitoring the potential environmental risks and impacts of the project on the communities and the living resources.

ii) Regional Level

a) Local Government Authorities

This will involve the Kanifing Municipal Council (KMC) and Brikama Area Council (BAC). Both councils are responsible for promoting development and waste management in their municipality/council and as such negative social and environmental impacts of the project activities will be of concern to them. They can also provide important support in mobilizing local communities in the project implementation zone (PIZ) and more importantly, some of the land required may belong to the councils. The councils are also responsible for maintaining the register of all properties in their jurisdiction for rating purposes, which should help identify the status of ownership of the landed properties in the project implementation zone. Councils are also responsible for waste management in their respective communities and their involvement in the operational phase will be important.

b) Governor's Office, West Coast Region

The Governor's office prepares all applications for leases within his/her jurisdiction. The Governor is the chairperson of the Regional Physical Planning Authority. Disputes among communities over land are referred to the office of the Governor if they cannot be solved at the district level. In cases of physical resettlement this office may be required to identify the land for relocation because of the scarcity of unoccupied land in Kanifing Municipality.

iii) Community level

i) Alkalolu

The Alkalo (Village Head), supported by the village elders, oversees the management of all customary land in the community. The mandate to allocate customary land is vested in the Alkalo and the head of families owning the land. Under this project the Alkalo and the family heads, will be consulted on any land required by the project and which is under customary holding. They are also responsible for, at the first instance, the resolution of land disputes in the community. The Alkalo will also support the Grievance Mechanism by acting as an entry point for lodging complaints.

ii) Ward Development Committee

The committee is the planning and development body for the ward and as such constitutes the entry point for all development programs affecting the community. For the project, the committees will play an important role in community mobilization for the social development component of the project. The Committee can also play an important in the sensitization of the communities and serve as an entry point for lodging complaints.

CHAPTER 3: PROJECT AREA: ENVIRONMENTAL AND SOCIAL BASELINE DATA

3.1. Background and context

Country and Sectoral Context

The Gambia lies between 13.79⁰ and 16.82⁰ West longitude and entirely within 13⁰ North latitude. It has an estimated area of 11,300 km² and Senegal surrounds it on all sides except the west where the country meets the Atlantic Ocean. The River Gambia that originates from the Fouta Djallon Highlands bisected the country forming the North and South banks. The country has a population of 2.34 million⁹ and an annual growth rate of 3.1%. With 174 people per sq. km, The Gambia is one of the most densely populated countries in Africa. More than half of the population is concentrated in urban and peri-urban areas. The economy relies primarily on the service sector, agriculture and industry. In 2021, the service sector contributed 57.5%, agriculture sector about 24.1% to GDP and industry 18.4%⁻¹⁰.

⁹ The Gambia 2018 Statistical Abstract 2018: Gambia Bureau of Statistics

¹⁰ Gross Domestic Product (GDP) Production and Expenditure for 2020 and 2021 (Abridged version)- Directorate of Economic Statistics, Gambia Bureau of Statistics

The Gambia's low-lying geography makes it particularly vulnerable to natural disasters and climate change impacts. It is increasingly susceptible to droughts, flooding, saltwater intrusion, windstorms, and strong variations in precipitation, including extreme runoff during the rainy season.

Rapid urbanization and population growth have also led to serious problems in the quality and adequacy of infrastructure throughout the country. Around 80% of the urban population resides within 20 km of the Atlantic coast. The Greater Banjul Area (GBA) where the project intervention zone (PIZ) is located is the largest and most densely populated metropolitan area of the country. It includes the Banjul City Council (BCC) and the Kanifing Municipal Council (KMC) and it is home to a population of over 1 million. It occupies an area of 93 sq. km (less than 1% of The Gambia's land area). These areas have expanded without adequate storm water management and drainage infrastructure and suffer heavy losses of property and sometimes of life during the rainy season, when flash floods occur. Anthropogenic factors such as unplanned urban expansion towards the coastal areas, encroachment of wetlands, increase runoff due to compacted and sealed surfaces, and deforestation are factors accelerating climate induced disasters.

3.2. Project intervention zone

The project intervention zone is the Kotu stream catchment area, specifically in the Kanifing Municipality Area. The stream has a length of about **11.2Km** and originates from 'Jufuru faroo', in Nema Kunku and flows following a line of depression from the east to north emptying into the Atlantic Ocean. The stream passes through several settlements/communities including Latrikunda Sabiji (Jola Kunda); Bundung; Sukuta, Serrekunda (London Corner); Bakoteh/Dippa Kunda; Manjai; Latrikunda Yiringanya, with its exit at Kotu between Sunset and Palm Beach Hotels on the Atlantic coast. The project intervention zone is densely populated with an estimated population of 201,044 (2020) and a land area of 1881 hectares and it is inhabited by relatively low-income communities with a high social flood vulnerability.¹¹

The stream can be divided into two main zones namely:

- (i) The river mouth/downstream river section, which is an area which is non-urbanized, with wide floodplains and connects directly to the West Coast beaches in the tourist area. This zone extends from the coastal beaches to the Serrekunda/Bakoteh Bridge;
- (ii) The upstream section, which is urbanized with limited space for floodplains and green area and where most of the population is settled. This area extends from Serrekunda/Bakoteh Bridge to the northwestern part of Nema Kunku village.

Figure 1 below is a map of the catchment area of the Kotu Stream.

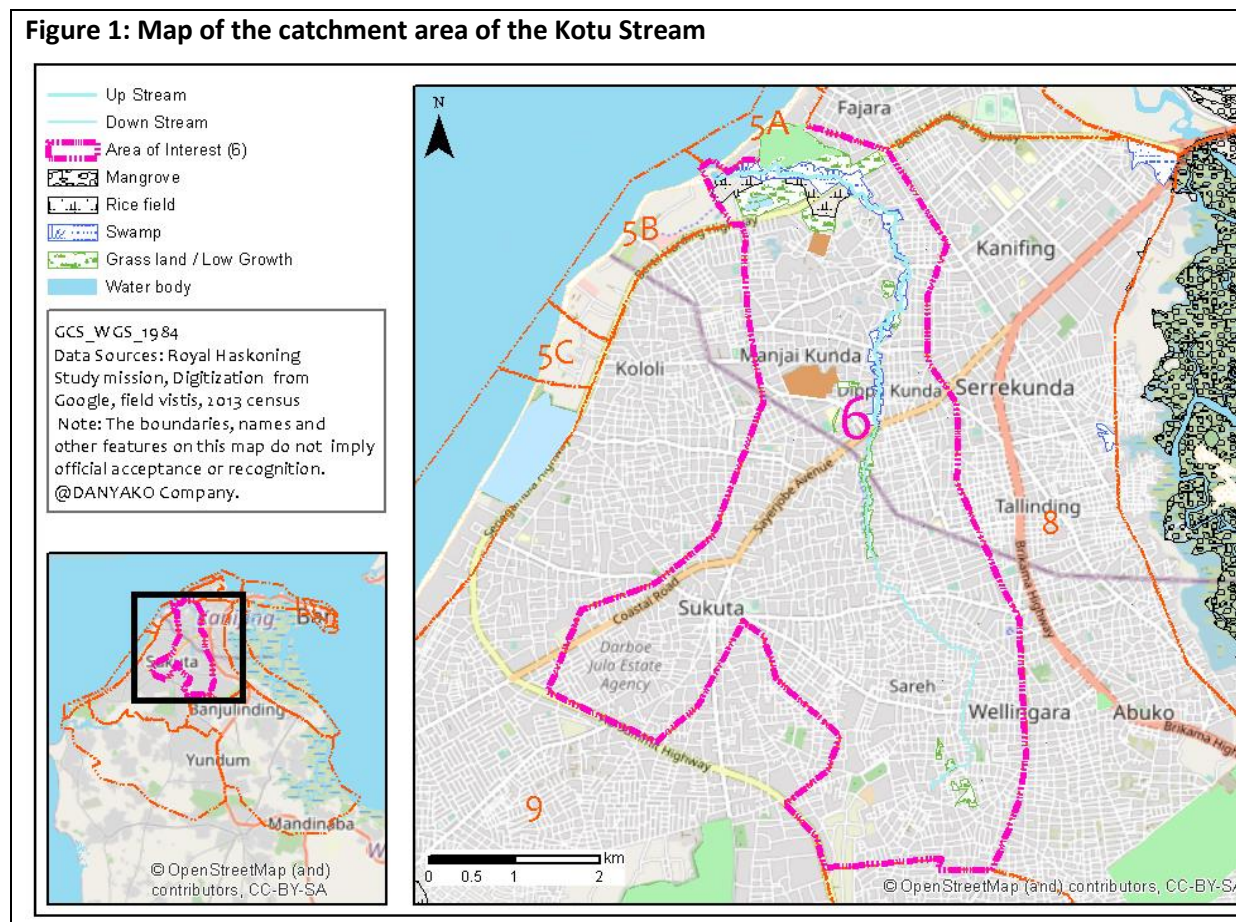
Due to construction in some places less than 5 meters from the banks of the stream, dumping of waste and other forms of obstructive elements (workshops and trading stalls) the water flow line of the stream has been diverted into several courses. This has led to the construction of several culverts and bridges over the stream to enable crossing from one side to another.

The area is prone to pluvial flooding which affects local residents and several critical public facilities such as schools and markets, power substations, and water supply facilities in the upstream section. In the

¹¹ Project Appraisal Document for the West Africa Coastal Areas Investment Project II

Stream's estuary area fluvial flooding as well as erosion have been reported impacting on Sunset Beach Hotel and other investments along the coast.

Figure 1: Map of the catchment area of the Kotu Stream



Source: Danyanko Company Ltd.

3.2.1 Catchment areas

The study area has two catchments' areas of rainwater runoff contributing to flooding in the intervention area. The largest watershed has a total catchment area of 629 ha with stream flow length of 3.45 km and a travelling time of concentration of 3.2 hr to reach its outlet point and watershed 2 has catchment area of 568ha with a stream flow length of 2.5km. The runoff of catchment 2 travels beyond the upstream of Nema areas toward Bundung Borehole. From Bundung Borehole the running water travels to Sukuta, ManjaiKunda and Bakoteh to the estuary.

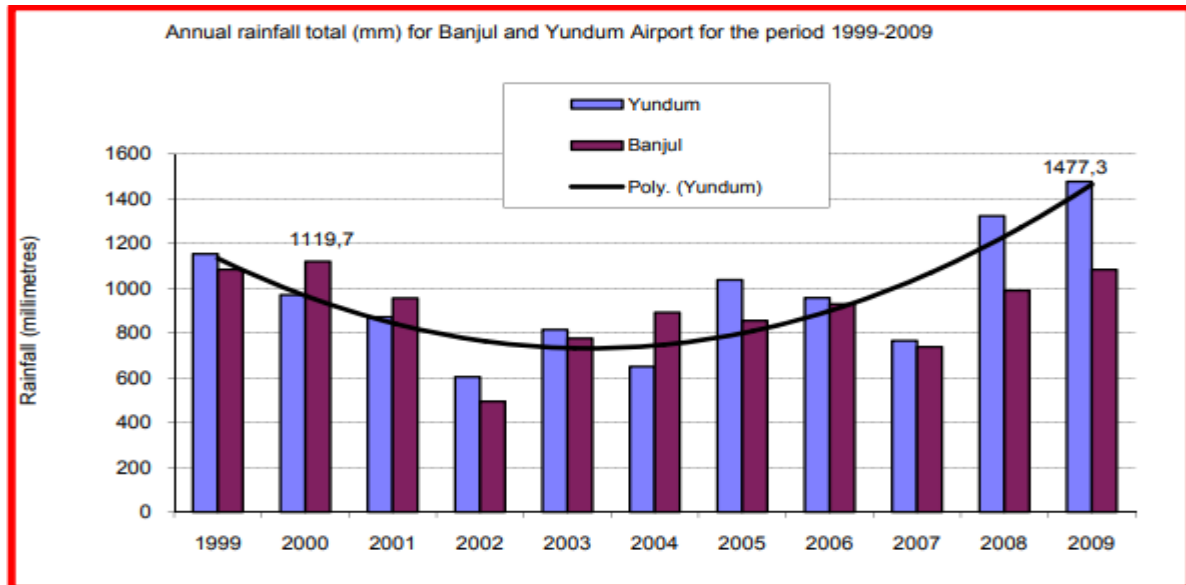
3.3. Physical Environment Characteristics

3.3.1. Climate

The Kotu Stream catchment area does not have a rain gauge; the two available rain gauges in the GBA are located in Banjul and Yundum International Airport. Statistical analysis of rainfall data at Yundum Airport and Banjul in shows a variation of the rainfall pattern. The results indicated that, Yundum Airport recorded the highest total rainfall of 1477.3 mm in 2009 and the lowest total recorded was 650.3mm in 2004. However, for the same period, Banjul recorded the highest total rainfall of 1083.4mm in 2009 and

the lowest total recorded was 604.0 mm in 2002. The results from **Figure 2** for the past ten years (1999-2009), reveals that, 2009 rainfall was abundant as compared to other years.

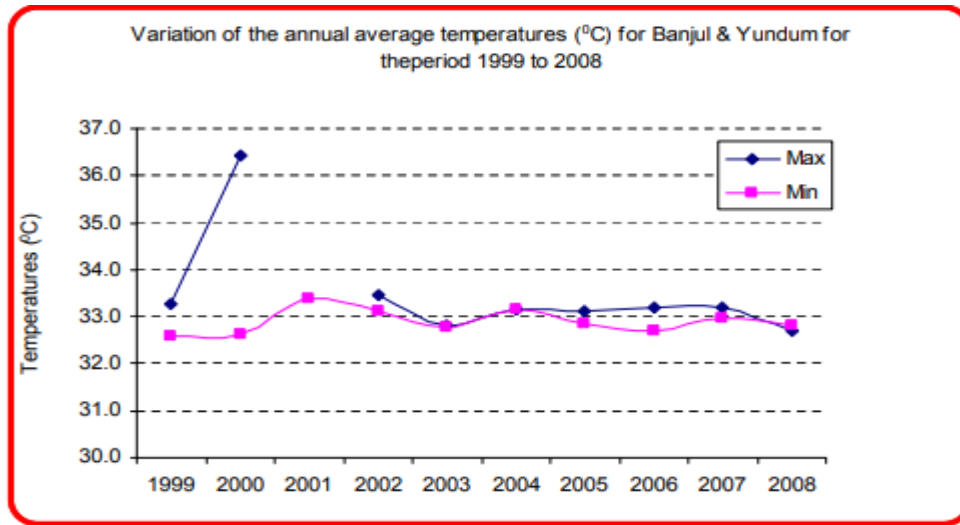
Figure2: Variation of the rainfall at Banjul and Yundum for 1999-2009



Source: Department of Water Resources

Due to the tropical latitude of The Gambia, temperatures are generally high, but they vary in time with the season and in space with the proximity or remoteness from the ocean. Temperatures are lower in the coastal areas than in the inland areas due to the quasi-permanence of the trade winds from the ocean. The results in **Figure 3** indicated that, Banjul recorded the highest maximum temperature of 36.40 C in 2000 and the lowest total recorded was 32.80 C in 2003. However, for the same period, Yundum recorded the highest maximum temperature of 33.10 C in 2001 and the lowest total recorded was 32.6 in 1999. However, it is observed that, despite Banjul's proximity to the sea, Yundum is cooler. Some of the factors could be attributed to congestion in Banjul and Yundum benefiting from the coolness of the forest, hence forest is located at the western sector.

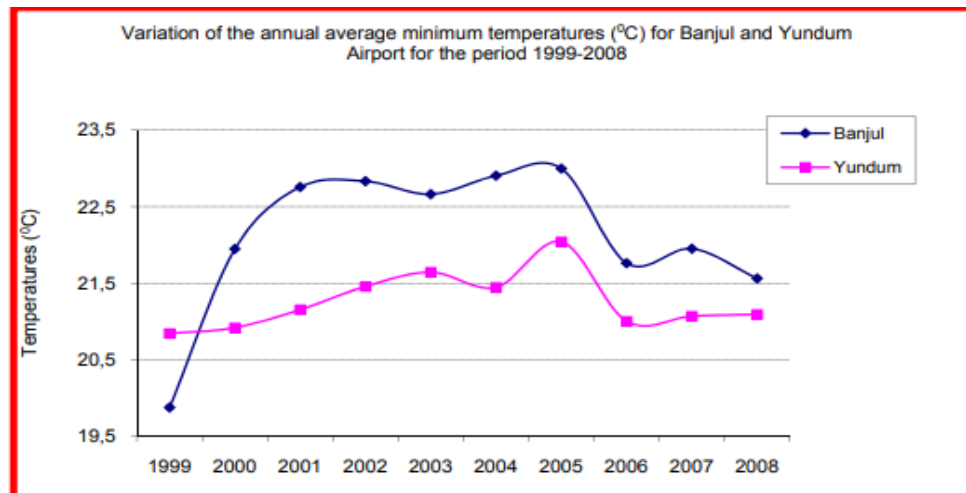
Figure 3: Variation of the annual average maximum temperatures at Banjul & Yundum for 1999-2008



Source: Department of Water Resources

The graph below shows variation of the minimum temperature for Banjul and Yundum. Banjul indicates a highest value of 23.5 degrees Celsius (0 C) in 2005, whilst Yundum recorded a highest of 22.0 0 C for the same period. In 1999, Banjul recorded a lowest value of 19.90 C and Yundum recorded a lowest of 20.80 C. However for Banjul, a difference of 3.70 C between the maximum and the minimum value is observed, this indicates a large variation for Banjul.

Figure 4: Variation of the annual average minimum temperatures at Banjul & Yundum for 1999 - 2008



Source: Department of Water Resources

3.3.2. Noise and Air Quality

Motor vehicles are recognized as the major contributor to urban air pollution; their emissions of suspended particulate matter such as carbon monoxide, nitrogen oxide and unburned hydrocarbon are on the increase. In November 1998, ambient air quality monitoring started in The Gambia for pollutants

for a period of two years with nitrogen dioxide (NO₂) being the parameter monitored. However, the program could not continue due to capacity constraints.

3.3.3. Relief and Geomorphology

The geology of the coastal area of the Gambia where Kotu Stream catchment area is located, comprises mainly sandy mild clay ranging in thickness between 2 - 6 m and 59-12 ka. It is fluvial, pluvial and alluvial. The mineralogy is comprised of between 70 – 80 percent quartz, about 10 – 25 percent clay mineral kaolinite with minor feldspar, limonite, and lithic fragments (China Complete Plant Survey, 1995).¹² The Geomorphology of the coastal area is characterized mainly by erosion and accretion, which to an extent is influenced by the geology of the area and vice versa.

3.3.4. Hydrology

Fresh water resources in The Gambia exist mainly in two forms: surface water and ground water. The River Gambia and its' tributaries are sources of surface water. Kotu stream together with the Tanji and Allahein stream are regarded as important tributaries in the coastal area although flow data is not available at these sites to determine their input.

Regarding groundwater resources, The Gambia sits on top of one of the continent's major sedimentary basins referred to as the Mauritania-Senegal-Gambia-Guinea Bissau-Guinea (MSGGGB) Basin. This comprises two main aquifer systems, a shallow sandstone aquifer (SSA) and deep sandstone aquifer (DSA). The groundwater constitutes the main source of drinking water in the project area, which is extracted and supplied to households by the National Water and Electricity Company (NAWEC). However, the demand is much higher than supply resulting in many households in the project area sinking their own private wells or boreholes.

The heavy extraction along the coastal zone aquifers of a distance between 0 – 2km away from the main River banks are considered the saline risk zones which includes the downstream area of Kotu stream. Another important concern is that the main waste dumpsite for the whole area of Kanifing Municipality, which is not properly managed and therefore, has the potential risk of polluting the groundwater resources.

3.3.5 Waste Management

Environmental pollution is a major challenge in the urban areas mainly due to inadequate municipal waste management, which contributes to degrading of environment quality. In the project area indiscriminate waste disposal by residents at home and at their businesses has, in some cases, blocked the stream's flow path as shown in the picture below.

¹² ETUDE DE SUIVI DU TRAIT DE COTE ET MISE EN PLACE D'UN SCHEMA DIRECTEUR DU LITTORAL OUEST AFRICAIN Diagnostic national en Gambie- Mrs. Ndey Sireng Bakurin & al- Septembre 2010

Photograph 1: Indiscriminate dumping of waste in Kotu stream



Source: Danyanko Company Ltd during field trip

Some of this waste include hazardous household wastes such as residues of toxic chemicals (paints, insecticide spray cans, dry cell batteries, fluorescent tubes and discarded electronic equipment.

Although the Kotu Stream area is particularly sensitive ecologically, it is home to one of the largest dumpsites in the Kanifing Municipality area and is sited near Tippa Garage at the edge of Kotu stream and less than 3 kilometers from the coast. The large open dump at Bakoteh has long been the main disposal site for wastes collected in the KMC area, but the recent rapid growth in waste volume disposed there has turned the site into a major environmental hazard. The Gambia, except the main Power Generation plant in Kotu, which occasionally has had serious spillages of sludge. There is also the Kotu Power Station, the largest power generating plant in the country located in Kotu close to the Stream estuary and which occasionally has had serious spillages of sludge, which finds its way into Kotu stream.

Sometimes waste from the Sewage Treatment Plant located near the estuary also finds its way into the Stream. Sewage from septic tanks in private homes are collected daily and sent to the plant for treatment and final disposal. In the Tourism Development Area (TDA), where several hotels are located similar liquid waste is collected from the hotels in that area are collected into the oxidation pond of the Plant where it is treated before being discharged into the stream. **However, during the stakeholder consultations some participants reported that raw sewage was escaping into the stream from the treatment plant.**

3.3.6. Land issues and Land Administration

The land tenure system in the project area is based a dual system consisting of statutory title and customary tenure. Statutory ownership of land is granted by the state in the form of a leasehold for a period of 99 years. Customary land tenure system, on the other hand, is based on the traditional system of ownership. According to the customary laws, where an original piece of land is cleared by a Kabilo (a collection of families) the ownership of land is vested in the head of the Kabilo. These heads of families have the right to dispose of the land, which in many cases results in unplanned settlement in some areas such as Bundung Borehole. In addition, there are squatter settlements, when individuals illegally occupy Government/municipal reserved lands and after a few years claim ownership.

A major challenge in land administration in the area is the limited capacity of the Department of Physical Planning to enforce the building and planning laws and regulations.

3.3.7 Vulnerability to floods

The project area is prone to both fluvial and pluvial flooding. The dumping of waste in the stream and illegal encroachments have obstructed the stream flow, which has reduced the drainage capacity of Kotu Stream. The high population density of the area consisting of relatively poor people also makes it highly vulnerable to social flooding. The negative impact of the flood on the people's livelihood is very significant. With climate change, extreme climate events such as floods have become frequent with increased severity in the catchment area especially in the upstream zone. These floods have resulted in considerable damage to property and in some cases loss of life. In addition, the heavy downpours severely erode the banks of the stream whilst at the same time reducing the stream's capacity to divert rainfall runoff to the sea. The floods cause direct damage to infrastructure (economic damage to houses, roads, etc.) The floods also create hygiene and sanitation problems as the water points become contaminated and the sewage system overflows, which can cause health problems such as diarrhea and skin rashes. The floods and stagnant waters are also known to attract reptiles in some cases posing serious danger to the population.

Indirect damages due to flooding consist of disruption to productive activities, employment, travel, and additional costs associated with flood management and flood proofing the private sector. In the coastal zone where fluvial flooding occurs considerable infrastructural damage occurs.

According to the National Disaster Management Agency (NDMA), flash floods have the highest occurrence among all the common hazards and a significant proportion of the flash flood hazards that occurs within the KMC are generated from the Kotu stream area. NDMA, in collaboration with multi-lateral and NGO partners, provide support to disaster victims in the form of food supply and clothing. In recognition of the potential damage that floods could cause, KMC, during the stakeholder consultations explained that the Council has an annual budget for dredging of exiting canals to facilitate the flow of the stream. In 2021 and 2022 the Council reported allocating a budget of GMD 1.14 million (22,00USD) and GMD 0.66 million (13,200USD) respectively for dredging. In addition to dredging, the council also provides disaster relief support to disaster victims.

In addition to the support provided by the Council, NGOs mainly ActionAid International (The Gambia) also support communities in the area on disaster risk reduction techniques such as erosion control, tree planting, dyke construction etc. Through their partner civil society organizations such as *ACTIVISTA*, these organizations provide capacity building support to the members of the community in the area of peace building and conflict resolution at community level and alternative livelihood programs such as handicraft and smart agriculture.

3.4. Biological Environment

The environmental baseline characterization considers the biological components of the coast, nearshore and the terrestrial environments within the PIZ.

3.4.1. Ecological profile of the area

The PIZ is an ecologically sensitive area with a mosaic of habitat types that range from coastal lagoons, mangrove swamps with fringing saltpan and grassland, which are home to many bird species. For this reason, the area is regarded as an Important Bird Area (IBA), thus serving as a hotspot for ornithologists who visit The Gambia for bird watching. The Kotu Creek Bridge is a famous bird watching site, where ornithologists could be seen documenting different bird species.

Photograph 2: Rich mangrove habitat at the estuary of Kotu Stream



Source: Danyanko Company Ltd during field trip

Flora

The coastal vegetation of the stream consist of a rich and diverse mangrove stand. The dominant mangrove species are *Rhizophora Harrisonii*, *Rhizophora racemosa*, *Avicennia*, *Laguncularia racemosa* and *Conocarpus erectus*. The mangrove serves as habitats for many species of small fish, invertebrates as well as large birds. They are major producers of detritus through leaf shedding that contribute to enhance the food supply for species such as the manatee.

Behind the mangroves stands are inter-tidal salt marshes with an assemblage of heterogeneous halophytic species such as *Borassus aethiopum*, *Elaeis guineensis*, *Cocos nucifera*, *Eucalyptus* and patches of invasive *Eleocharis spp.* The non-coastal areas of the stream (Nema, Bundung and Serrekunda) do not harbor any vegetation or significant ecosystem as these areas are all occupied by human settlements.

3.4.2 **Fauna**

3.4.2.1. *Aquatic Invertebrates*

The aquatic invertebrate fauna within the PIZ is composed predominantly of crustaceans and mollusks. Very abundant species include shrimps (*Penaeus notialis*), crabs and mangrove oysters *Crassostreatulipa*.

Fish

Fishes belonging to at least five (5) families have been recorded in the area. The most abundant of these species are tilapia species, followed closely by mullets. Although the Atlantic mudskippers are also present in large numbers and are very widespread. The mangrove ecosystem serves as breeding ground for most pelagic fish species and their juveniles remain in the habitat until they reach maturity before finally making their way into the open ocean

Reptiles

The Gambia is home to approximately 67 reptile species and most of these are land based. Both the Nile crocodiles (*Crocodylus niloticus*), and Dwarf crocodiles have been recorded in the kotu creek. These crocodiles are seldom to be spotted and it is believed that they migrate from the waters of Tanbi Wetland

National Park. Already, the dwarf crocodile (*Osteolaemus tetraspis*) has been classified as Vulnerable on the IUCN Red List of Threatened Species. In addition to crocodiles, turtles are other reptile inhabitants of the ecosystem of the stream. In The Gambia, four identified species are known to exist, namely: Green, Hawksbill, Leatherback, Olive ridley and possibly also Loggerhead turtles. The Green, Loggerhead and Olive ridley turtles are listed as endangered on the IUCN Red list and Hawksbill and Leatherback turtles as critically endangered (IUCN 2000). The recorded turtle species in the Kotu Stream area are the leatherback turtle (*Dermochelys coriacea*) and the Green turtle (*Chelonia mydas*) which are both on the IUCN Red list of endangered species.

Although rarely seen, different snake species commonly Royal python, Olive snake, spitting cobra, forest cobra, puff adder have been recorded in the marshes and hotel vicinities of the Stream.

Birds

The Gambia's location puts it in the flight path of two bird migrations. The first Palearctic migrations from Europe in October, which returns March / April of the following year. For these migratory European birds, it is the first life-sustaining strip of green after the long flight south along the arid coast of northwest Africa. The second migration is from the south at the start of the rains, June / July, of birds from the equatorial regions of Africa, which come to the Senegambia Valley in time for the breeding season. These birds from the equatorial regions exit The Gambia at the end of the rainy season. The country's local species population is therefore given a boost during these months, though the rise due to the Palearctic visitors is usually only a matter of a few days or weeks. On the other hand, the June to July influx lasts the whole of wet period, with migratory species coming in to settle to find a mate and reproduce.

With respect to water birds, The Gambia has conducted water bird census since 1998 mainly between January and March and the colony of species identified include shoreline seabirds, osprey and migrant birds. Colonies of specific species c congregation of Terns, Gulls, Pelicans, Cormorants, Spoonbills, Herons and Warders are found year round for purposes of nesting, roosting, feeding and shelter.

Coastal ecosystems such as Kotu Stream provide important feeding and breeding for some of these Palearctic migratory species, inter-African and resident species. Egrets, Herons and Ibis are particularly well represented. An area of just a few acres provides a nesting site for many thousands of breeding herons, cormorants, terns, gulls, weavers and doves all of which nest in close proximity to each other. Water birds feed in the low tidal mud and smaller streams, resting in marshy parts of the area, roosting in the mangrove and breeding in the small islands. There is a dedicated bridge, Kotu Creek Bridge, for bird watching.

Presently, this ecologically sensitive area is threatened by encroachment of human settlement, pollution from the waters coming from upstream, sewage from the Treatment Plant and the occasional oil spills from the Kotu Power Station.

Photograph 3: Different types of birds found in the estuary of Kotu stream



Hérons



Egret



Cormorant

Mammals

Mammals are rarely seen due to the presence of dense human settlements around the environs of the Stream. However, certain mammals such as the Gambian sun squirrel, Green vervet monkey, and Red colobus monkey have been sighted in the area. Aquatic mammals are yet to be recorded in any vicinity of the Stream even though the clawless otter and the West African Manatee are recorded in the Tanbi Wetlands National Park which is in close proximity to the creek.¹³ Due to its threatened nature which results from excessive subsistence hunting coupled with destruction of habitats, this aquatic mammal a keystone species in the Gambia if not protected is likely to go extinct in the near future. The West African manatee listed as vulnerable in the IUCN red list of threatened animals appears on Appendix II of CITIES. In The Gambia, manatees occur in both fresh and saltwater areas and are said to be abundant in the estuaries where access to freshwater is facilitated. Proposed improvements and developments particularly in the estuary of Kotu Stream may make attract manatees.

3.5. Ecosystem Services

There are many useful products derived from the ecosystem in the study area. Water, food, wood and other goods are some of the material benefits provided to people. For example, the Rhun Palm tree is found abundantly within the study area and it provides food, wine (juice and fruit) and timber. The Eucalyptus, which is also common, is used as live fences. Its trunk and branches are useful for timber and as fence posts. The ecosystem also provides important spawning ground for fish whilst the cultural services provide important attraction for tourists particularly those interested in bird watching.

Another ecosystem service include the provision of spawning/nursery grounds for some fish species. The mangrove forest located in the estuary are important spawning/nursery grounds for some fish species and they serve as habitats for many species of small fish, invertebrates and large birds. Mangroves are major producers of detritus through leaf shedding that contribute to offshore food chain.

On the regulatory service, the ecosystem maintains air and soil quality and flood control and when altered, the resulting losses can be large and difficult to compensate. The present vegetation cover prevents soil erosion, participates to groundwater regulation on water quality and flow and improves soil fertility through natural biological processes such as nitrogen fixation. The trees present in the heart of the settled areas such Bundung and Nema contribute to the air quality locally.

¹³ The Park is a Ramsar site since 2006 and the vegetation comprises mainly estuarine and intertidal forested wetlands, most of which is dominated by mangrove swamps. It harbors vulnerable species like the African manatee (*Trichechus senegalensis*), African Clawless otter (*Aonyx capensis*).

3.6 Human environment

3.6.1. Demography

The project beneficiary communities include Latrikunda Sabiji/Nema, Bundung Borehole, Bakoteh, Tippa Garage, DippaKunda, Manjai and Kotu which are estimated to have a population of 201,044 people.¹⁴ According to the Planning Department of KMC the total number of registered households in the area is 7824 with 21428 buildings, representing respectively about 22% and 27% of the municipal totals as shown in the table below.

Table 7: Registered household and buildings within the project area

No.	Community/Area	No of Households	No of Buildings
1	LatrikundaSabigi/Nema	1921	3033
2	Bundung Borehole	1820	5313
3	Bakoteh	1373	4217
4	DippaKunda	948	3989
5	Kotu /Manjai	1762	4876
6	TOTAL	7,824*	21,428
7	Municipal Total	35259*	79198
8	Percentage of Municipal total	22.2%	27%

**figure includes open space, parks and cemeteries*

Source: KMC Planning Department Statistics

Total number of registered businesses within these communities is estimated at 1,816 representing approximately 16% of the Municipal total.

3.6.2. Administrative organization/structure

The Gambia has a two - tier administrative structure characterized by central and local government administrative systems. The Central government administration comprises the executive (the President), ministries and government departments and agencies at national level, and their decentralized structures at regional and district levels. There are altogether 5 Regions in the country. In addition to the five regions there are two Municipalities each of which is headed by an elected mayor.

The local government structure comprises local Councils of the respective regions and municipalities, each consisting of elected representatives from the different Wards that constitute the Council. There are eight LGAs in the country whose mandate is to generate revenue for the Council through local rates tax and apply it for the development of the area.

KMC is divided into 19 wards hence 19 elected councilors who constitute the General Council that oversees the management of the municipality. The Council is headed by the Lord Mayor who is also elected by all registered voters within the LGA.

¹⁴ Project Appraisal Document for the West Africa Coastal Areas Investment Project 2

Brikama Area Council has 28 wards, which elect a councilor each. The 28 councilors constitute the council that oversees the management of the Area council. The Chairman who is also elected by all registered voters within the Local Government Area (LGA) heads the Council.

Below the General Council are the Ward Development Committees (WDC) headed and chaired by the elected councilors of the respective wards. The Ward Development Committees are responsible for local development in their respective areas.

3.6.3 Ethnic groups in the project area

The project area is a multi-ethnic society, exhibiting a high degree of ethnic and religious diversity and tolerance. The ethnic groups include mainly the Mandingos, Fullas, Wolofs, Jolas, Sarahules, Manjagos and Akus with pockets of settlements of other tribes of less significance in numbers. Whereas these ethnic groups are in general mixed, their concentration varies depending on the concentration of a particular ethnic group in a given area. Immigration from the hinterland and from the neighboring countries has resulted in inter-marriages thus paving the way for more cultural and religious tolerance as well as promotion of peaceful co-existence. The dominant languages in the community are Mandinka and Wolof, although in the specific settlements the language of the largest ethnic group tend to dominate.

3.6.4 Economic activities

The livelihood of the communities within the PIZ is mostly based on the following:

Trade

Many of the people are involved in various types of trade although the dominant one is petty trading of various kinds. There are the small shop keepers within the neighborhood where different types of food commodities (rice, cooking oil, etc.) are sold. These shops maybe operated by the owner of the premise or a relative or the premise may be rented out to somebody else to conduct the business. This form of petty trading is very much dominated by men. Women traders operate mainly in the markets which are sometimes located away from their neighborhoods and therefore requires them to travel daily which is a major challenge in the context of poor communication. In addition, there are roadside vendors and vendors on foot who visit homes to sell their goods. There are also skill workers such as mechanics, carpenters and electricians who operate small workshops.

Agriculture

Due to limited availability of land in the project area, the scale of agricultural activity especially at the primary level of the value-chain (production) compared to other regions is relatively low. Notwithstanding, there is considerable amount of agricultural activity going on within the project area in the form of small gardens (Bundung Borehole/Sukuta) and rice farmlands mainly in the downstream where there are wide floodplains in Manjai, Kotu and along the Bertil Harding Highway and Kotu Power Station. Most of the farmers are women and the land they cultivate is very often borrowed which adds to their vulnerability. Crops grown are mainly vegetables and rice, the main staple food of the communities. The annual average income per farmer based on figures provided by the different communities during the consultations were, on average GMD15, 625 (equal to \$312.5 USD) for those that cultivate twice in the year, and GMD11, 250 (equal to \$225 USD) for those that cultivate only once due to salt intrusion during the dry season.

Fish Retailing

Processing and retail marketing of fish are predominantly women activities. The women buy the fish from coastal fish landing sites at Bakau, Brufut and Tanji, and transport them to the fish market at Tippa Garage close to the Kotu stream to process and sell on retail. Because of the limited space, many of the retailers display the fish along the roadside on the ground for sale, which sometimes lead to the spoilage.

Handy-Craft and Tie and dye

Handy-craft activities involving painting and pottery for flowers are done by men and mostly along the Bertil Harding Highway. The activities require great skill and therefore rewarding, given the high prices that are charged for the goods. The spaces occupied by these craftsmen do not belong to them, they are allowed a temporary use of the land until the municipality or the Government requires it.

Tie and Dye activities on the other hand, are mostly carried out by women in Dippa Kunda close to the stream. It is the main source of income for these women. The main risk associated with this activity is pollution of the stream and groundwater resulting from the disposal of residue of chemicals used in the processing into the stream or on the ground which can be harmful to natural habitat.

Tourism

The tourism sector is one of the main contributors to both GDP and employment. Estimates from the World Tourism and Travel Council (WTTC) suggest that tourism directly contributed about 8.5 percent to GDP, or US\$98 million, and 6.5 percent to employment in 2019. Tourism is mainly concentrated along the coast area where the main attractions are the sandy beaches and the wildlife, particularly its rich avifauna. The sector provides mostly seasonal employment in the low wage category. In addition to employment in the hotel industry there are many small tourism-related business operated by the members from the different communities in the GBA including the residents in the Kotu Stream catchment area. Women are also key players in the industry especially in the food service sector and as vendors at the tourism craft markets.

3.7 Access to Basic Social Services

Basic Social services include the following:

Access to Education

Within the KMC, there are 256 registered schools including Early Childhood Development Centers, Lower and Upper Basic and Senior Secondary Schools as at 2021. Total enrollment for all these three categories is estimated at 120,802 students of which 65,569 representing over 54% are female. Details of situation at the Basic and senior secondary schools are provided in the table below.

Table 8: Type of schools and population by gender in Kanifing Municipality

No	Type of school	Number of schools			Population		
		Public	Private	Total	Female	Male	Total
1	Nursery	0	31	31	6754	6786	13,540
2	LBS (Lower Basic)	23	103	126	33244	28706	61950
	UBS(Upper Basic)	14	38	52	13,815	10586	24401
	SSS (Senior Secondary)	13	34	47	11756	9155	20911
	TOTAL	50	206	256	65569	55233	120,802

Source: Planning Department Ministry of Basic and Secondary Education (MoBSE)

With a total land area of 75.55 sq km for KMC, the concentration of the Lower Basic, Upper Basic and Senior Secondary Schools are 1.6, 0.7 and 0.6 schools per square Kilometer respectively. This proximity is consistent with the requirements of the national education policy. However, due to increasing population in the area, the need for increase capacity at the schools is growing while land to construct schools IS not available as reported by the communities of Manjai and Bundung, and confirmed by the Ministry of Basic and Secondary Education (MoBSE) representative during the consultations. The limited capacity at the schools especially at the Upper and Senior Secondary levels has meant children from these communities are unable to continue their schooling within their communities and have to either dropout or continue elsewhere with the difficulties of transportation and transportation fares and other related costs.

Access to Health Services

In the project area, there are 5 health centers, 2 of which are public and 3 private, thus providing reasonable access to the communities in terms of proximity. However, during the consultations the residents informed that access to health facilities is limited by poor road network especially during the rainy season and high transport cost. The result of this limitation is reflected in the number of cases for waterborne diseases such as diarrhea as indicated by data from selected hospitals and clinics within and around the project area provided in the table below.

Table 9: Cases of diarrhea confirmed at selected hospitals in the project area in 2021

No.	Hospital/Clinic	No of cases confirmed			
		2018	2019	2020	2021
1	Bundung Maternal Child Health Hospital	9324	7182	3572	4431
2	SinchuBaliya Village OPD	557	400	288	223
3	Wellingara Community Clinic	40	64	104	116
4	ABS Private Clinic	1058	448	208	167
TOTAL		10,979	8,094	4,172	4937

Source: Health Management Information System (HMIS) 2021

In spite of the declining pattern of the number of cases recorded over the four-year period as the table suggests, the level of incidence remains a concern. Poor settlement patterns along the stream, use of un-hygienic water for drinking and stagnant pools of water in some sections of the stream are all contributory factors to incidences of diarrhea and malaria.

Road Infrastructure

The project area is characterized by poor road infrastructure and drainage system, which together with poor waste management are a major cause of flooding in the area. The Stream has seven concrete bridges along its 11.2 kilometer length, which connect the two sides of the stream thereby making access to the various points along the stream easy. In addition to these bridges, there are other smaller bridges less durable that also facilitate access for the people. The Mama Kandeh Bridge at Bundung is one example of such bridges. However, the communities have expressed the need for more durable access bridges to facilitate movement of persons, vehicles and goods at some of the strategic locations. Based on this demand and a needs assessment survey conducted by the National Road Authority, the Authority

planned to construct 5 additional access bridges which was suspended subject to the outcome of this project, WACA ResIP2. This was revealed during the stakeholder consultations.

Access to utility services (water supply, sanitation, electricity)

Utilities: Utilities (including water and electricity) within the KMC area are mainly provided by National Water and Electricity Company (NAWEC). The services are generally un-satisfactory as reported by most of the communities during the consultations. The poor service delivery by NAWEC has warranted the few wealthier residents to install solar energy for water supply and electricity in their homes. However, this option is not affordable to most households in the area because of the level of poverty. In most cases the residents get water from taps sometimes located at far distances from their homes. Others get it from wells sunk in the vicinity with all the risks of contamination. This situation gives rise to the following:

- Water is economized at the expense of good hygiene;
- Children are exposed to contaminating water borne diseases; and
- Using of candles for providing light for the household which has the risk of fire accidents

The most common form of toilet is pit latrine. Flush toilets are either expensive to set up or running water supply from NAWEC is not available in the area concerned.

Sewage

As discussed above, NAWEC is also responsible for the management of the wastewater that is collected from the homes taken to Kotu Sewage Plant for treatment and eventual disposal at the estuary of Kotu Stream. According to the Site Engineer of the plant, approximately 200 tanks of waste estimated at about 1,400,000litres of wastewater is received daily in addition to an estimated 300,000 liters that is discharged by the hotels. The capacity to handle this quantity is limited, more so with the increase in usage of water due to increased population and increased access to flush toilets. The Plant lacks equipment to test the quality levels of the wastewater to ensure aquatic life is not harmed. This deficiency also has serious implications for human lives. Another concern is the limited storage space for the sludge. In this regard, the possibility of making organic fertilizer from the sludge as well as an alternative location for the sewerage remain options that need to be urgently explored.

3.8. Gender, Gender-Based Violence (GBV) and Gender inequality

Gender disparities in The Gambia are still significant, and the resulting constraints in education, health, income, and legal rights prevent women from participating effectively in national development. This is partly because Gambian society is still very much patriarchal, with strong traditional/cultural and religious beliefs deeply rooted across all ethnic groups some of which are highly harmful and violate the Sexual, Reproductive, Health and Rights (SRHRs) of women and girls. This has made women and girls highly vulnerable with lesser voices in decision making due to their low status in society. Key among them is sexual exploitation and sexual harassment, and other forms of sexual and domestic violence meted on women and girls due to high discrimination as a result of incorrect gender concepts, attitudes and behavior.

Partly because of these equality and equity gaps, the majority of the poor and extremely poor in The Gambia is made up of the women who comprise up to 50 percent of the national population. In 2019, The Gambia was ranked 174 out of 189 countries with a score of 0.466, according to the UNDP Human

Development Report's Index ranking. According to the Gender Inequality Index¹⁵ (GII), 2016 Gambia was ranked 143rd with a value of 0.622. The poverty of women is closely linked with very low literacy levels (40 percent for women and 64 percent for men) and education attainment rates for a variety of reasons, including restrictive cultural norms and challenges in physical access to school.

Women also suffer from violence, particularly domestic violence, and sexual abuse. Rural women play a limited part in overall decision making in the family and in how the family income is spent. This low participation in decision making in the household extends also to lower access to political decision-making and representation in the political sphere. In The Gambia, female genital mutilation (FGM) for girls is still pervasive (76% prevalence rate) as are early marriage and other forms of exploitation with respect to girls.¹⁶

To address these challenges and reduce gender disparity, the Government formulated policies and legislations to increase opportunities for women and prevent violence against women. The policies include "Gender and Women Empowerment Policy 2010-2020" which has the "overall goal...to mainstream gender in all national and sectoral policies, programs, plans and budgets to achieve gender, equity, equality and women empowerment in the development process." It is important to note that the Policy has failed to address sexual harassment both in school and at workplace and it is expected that this issue will be taken up in the new Gender Policy 2023-2032 which is currently being formulated.

Specific legislation to address these conditions include the Women's Act, 2010 which seeks to eliminate all forms of discrimination against women and the Women's Amendment Act 2015 which specifically prohibits Female Genital Mutilation (FGM) which was absent in the 2010 Act. There is also the Sexual Offences Act, 2013, which provides protection against sexual crimes against all persons, especially vulnerable groups, including women, children and people who are mentally and physically disabled. However, while there have been some legislative gains, this still has not translated into significant outcomes to close gender gaps in a number of spheres.

Women and Land ownership

Generally, barriers exist for women in accessing land under customary title/ traditional arrangement because of cultural norms and custom. Women's rights on land, as they relate to customary tenure, are restrictive. Whilst this does not pose any problems in State Lands (where land is owned by and administered directly by the State), it is a major obstacle with respect to customary land. The Constitution recognizes customary practices as an important basis for customary tenure thereby posing an obstacle to the legal equality of women and thus reinforcing customary practices that deny women ownership and control over land. This is reinforced by the sharia law, which is applicable to inheritance among Muslim families, and according to which the female heirs receive only half (50%) of the inherited assets compared to their male siblings. The Women's Act, 2010 provides pre-eminence over personal religion, so female heirs are legally entitled to the same amount as their male counterparts; however, as explained

¹⁵ The Gender Inequality Index (GII) reflects women's disadvantage in three dimensions—reproductive health, empowerment, and the labor market—for as many countries as data of reasonable quality allow. The index shows the loss in human development due to inequality between female and male achievements in these dimensions. It ranges from 0, which indicates that women and men fare equally, to 1, which indicates that women fare as poorly as possible in all measured dimensions.

¹⁶ The Gambia, *Child Protection Plan of Action, 2016-2018* and UNICEF Gambia, https://www.unicef.org/gambia/activities_8342.html.

above, because of the strong influence of religion and customary norms, this is not always practiced. The land tenure in the project area is mainly customary/ traditional with a few leasehold.

Gender disparities in labor force

In their assigned role as the main caregivers within the home, women are particularly disadvantaged in the labor market because of the need to combine paid jobs with unpaid work such as childcare and household chores. This leaves them with fewer employment choices. Access to credit is also generally more difficult for women especially rural women who are discriminated in accessing credit because they do not own land and they cannot offer adequate security or collateral. Labor force participation in the country among women is low and reduces the growth potential of the economy. In urban labor markets where the project is located, female participation is only 37 percent compared to 70 percent for men¹⁷.

Violence against Children (VAC)

Violence Against Children (VAC) is defined as physical, sexual, emotional and/or psychological harm, neglect or negligent treatment of minor children (i.e. under the age of 18), including exposure to such harm,¹⁸ that results in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power. This includes using children for profit, labor¹⁹, sexual gratification, or some other personal or financial advantage. This also includes other activities such as using computers, mobile phones, video, and digital cameras or any other medium to exploit or harass children or to access child pornography. In The Gambia, for instance, there have been reports of children, mostly girls, subjected to domestic service and commercial forms of exploitation (i.e., tourism).²⁰ Boys in urban areas are known to work as taxi or bus attendants whilst girls work as street vendors, selling food items such as candy, water, fruits for their parents.

During the implementation of this Project, the potential areas where this can be manifested may include employing children under the age of 18 years in project activities. Children may also be used for personal or financial advantage by both contractors and subcontractors. Any other ways may include using children, for sexual exploitation and physical or sexual violence, especially during the short stay of contractors in the communities.

In this regard, the Project Implementation Unit (PIU) and Contractors must ensure that no aspect of Project works involve children under the minimum age of 16 for light work (as per *The Children's Act, 2005*), and none under the age of 18 for hazardous work and work that affects their schooling and social or moral development.

The Labor Act, 2007 prohibits children under 18 from engaging in agricultural, industrial, or non-industrial work for economic gains. In addition, to strengthen and protect children against possible violence and

¹⁷ Republic of The Gambia Overcoming a No -Growth Legacy Systematic Country Diagnostic,2020

¹⁸ Exposure to GBV can also be considered VAC where there is a gender bias and/or the act is of a sexual nature, such as SEA, which is a form of GBV and can be experienced by both girls and boys. Bullying in school, however, may be considered VAC, for instance, but it is not likely to be considered a form of GBV or SEA/SH,

¹⁹ The employment of children must comply with all relevant national legislation, including labor laws in relation to child labor and the World Bank's policies on child labor and minimum age. They must also be able to meet the Project's Occupational Health and Safety competency standards.

²⁰ See note 5

exploitation, Project codes of conduct, Action Plan for Implementing ESHS and OHS Standards, as well as the SEA/SH Prevention and Response Action Plan must be rigorously applied and monitored for compliance. These codes of conduct will be included in the Contractor's ESMP.

Disadvantaged and Vulnerable Groups

This category includes women who are generally marginalized and unable to fully participate and benefit from the development benefits. By virtue of their position in society, they are also more vulnerable to risks related to SEA/SH. In addition to women, other groups regarded as vulnerable and disadvantaged include the elderly and minors, illiterate persons and persons with disabilities. Like the women, these groups are more likely to be adversely affected by Project activities such as civil works, teacher recruitment, training and deployment. In the project they may not also be adequately consulted about the project because of the timing of such meetings. These and other factors can combine to reduce their access to potential project benefits. Disadvantages and vulnerable groups therefore require specific measures and/or assistance to address their vulnerability to certain risks, including SEA/SH and VAC. These include arranging special meetings with these groups that takes into account their daily activities as some of them work in gardens. Advance notice for meetings is also necessary to ensure their effective attendance. They will need to participate meaningfully in project activities by providing information in a language they understand.

Main Environmental and social challenges

In summary, the main environmental and social challenges are provided below.

Flooding

The area is prone to both pluvial and fluvial flooding. In the upstream section, fluvial flooding causes direct damage to infrastructure (economic damage to houses, roads, etc.). Indirect damages consist of disruption to productive activities, employment, travel, and additional costs associated with flood management. Unplanned settlements together with dumping of waste in the stream obstruct the water flow line, which have reduced the drainage capacity of the stream so that flash floods occur with heavy rains. The stream's estuary area is affected by fluvial flooding which affects some of the coastal infrastructure.

In the coastal zone, fluvial flooding because of sea level also result in considerable losses for the two hotels situated in this area.

With climate change, floods have become frequent and with increased severity increased damage to property and times in the loss of life. The socioeconomic conditions of the residents and the poor infrastructure have made them very vulnerable to the impacts of climate change.

Poor waste management

This is another major environmental challenge and a major contributor to degrading the environment quality. There is indiscriminate waste disposal by residents in the stream and on the banks, which has blocked, in some cases, the stream's flow path. The waste include hazardous household wastes such as residues of toxic chemicals (paints, insecticide spray cans, dry cell batteries, fluorescent tubes and discarded electronic equipment). In addition, there are reports of raw sewage being dumped into the estuary by the Sewage Treatment Plant at Kotu.

Erosion

Erosion is also another major environmental challenge in the project area. The heavy rains severely erodes the banks resulting in the loss of crops and houses and other infrastructure located too close to the stream. The combined effect of these losses is increased poverty.

Ecological sensitivity

Certain sections of the project area are ecologically sensitive with a mosaic of habitat types that range from coastal lagoons, mangrove swamps with fringing saltpan and grassland, which are home to many bird species. The coastline of The Gambia serves as stopover for Palearctic migratory birds into Tropical Africa and Kotu stream is one of the areas that provide important feeding and breeding grounds for some of these migratory species as well as the inter-African and resident species. The Kotu Creek Bridge is a famous bird watching site, where ornithologists could be seen documenting different bird species. Some of the bird and animals sited in this area are already feature in the IUCN red list of endangered species. Presently, this area is suffers fom encroachment of human settlement, pollution from the upstream, the Sewage Treatment Plant as well as used oil from the Kotu Power Station that sometimes escape into the waterbody.

Limited access to basic social facilities

In addition to the low-income status of the resident especially in the upstream section, access to basic social services is limited. The road network is poor, bridges to facilitate crossing are inadequate and sometimes poorly constructed. This condition makes access to services such as health and education expensive for many of the residents. Land is also very much limited and because of the high population density there is very little land to build public infrastructure, a situation currently faced by the Ministry of Basic and Secondary education that is trying to build schools in the area.

4. ANALYSIS OF ALTERNATIVES

The analysis of the alternatives focused mainly on the following two scenarios:

- No project intervention
- Limited Intervention
- Situation **with** the implementation of the project

4.1 No project intervention

This will mean allowing the status quo with earth drainage, few solid bridges and continued indiscriminate dumping of waste. The existing earth drains will, over time, be undermined by runoff water and eventually collapse causing blockage and therefore, risk of flooding the entire area thus creating major environmental risk to the people. This option may have little cost but the potential social, environmental and economic impacts will be high as being presently experienced. These impacts include i) flooding and destruction of houses and other properties; ii) indiscriminate dumping of waste with the resulting health hazards will continue; iii) the flow path of the stream will continue to be obstructed and narrowed depriving it of adequately carrying out its ecosystem functions; iv) loss opportunities for youth employment and support to other vulnerable groups; and v) greater exposure to the risk of climate change induced disasters because of continued low level of resilience.

The "No project alternative" will therefore have major negative socio-economic and health consequences, which can only increase the poverty of the population and increase the prevalence of diseases especially waterborne diseases. The destruction of wildlife habitats will reduce the tourism development potential of the area.

The cumulative impact may result in the death or changes in the species composition of the algae, invertebrates, and fish communities. This in turn will affect the birds that come to feed and breed in these areas thus endangering the ecosystem functions of the Kotu catchment area.

4.2 Limited intervention to improve drainage

This option would consist of improving the existing earth drainage canals by dredging using local materials and community labor to increase the stream's capacity to evacuate floodwaters and reduce the risks of flooding. The main advantages of this alternative would be a relatively low financial cost and the potential low negative socioeconomic impact. The potential risks of displacement would be small or non-existent and the disruption to existing economic activities would be minimal.

However, the main disadvantages of this option are that the limited financial and technical resources available would not allow a comprehensive assessment of the catchment area's challenges and the development potential. The civil works will not be guided by international standards and best practices because of the limited financial resources and technical capacity. Other important aspects of the development of the catchment area such as the construction of bridges, instituting improved waste management system and creating economic opportunities will not be addressed. Furthermore, overtime, because of the design and nature of materials used, the drains will be undermined by runoff water and eventually collapse causing blockage and therefore, risk of flooding the entire area thus posing environmental and social risks to the residents.

With respect to the cumulative impacts, these will be similar to those mentioned above above.

4.3 Situation "with" project

The "With-project" situation will include the construction of concrete drainage canals based on professional design and execution of the works using the right materials and equipment. This may have longer duration in terms of sustainability and allow the water to flow freely. Other positive impacts of this option are given below.

- **At the socio-economic level**

The project will improve the living conditions of the local population through Component 3, which aims to reduce floods through investment in physical infrastructure. It will also help build the resilience of the communities through employment creation and social subprojects. The activities such as the river park can stimulate private investment and the creation of employment opportunities especially for youth in the project area.

- **In terms of the environment**

At the environmental level, the implementation of the project will contribute to the protection and integrated management of the stream and the adjacent coastal area and help preserve natural habitats such as bird sanctuaries, which constitute an attraction for tourism with certain benefits for the population.

The implementation of the project will minimize the negative impacts on the environmental and social environment because it will be required to implement fully the mitigation measures prescribed in accordance with the national environmental and social laws in force and the World Bank Environmental and Social Standards.

- **At the institutional level**

The implementation of this option will promote better policy and institutional coordination national and regional in managing the challenges of the coastal areas including climate change and disasters. It will also provide support for the capacity building of the national institutions for more reliable data and information analysis and better decision making.

- **Cumulative impact**

Increases in stream flows can cause erosion of streambeds and streambanks, thereby degrading spawning and feeding habitats for fish and reducing living space for invertebrates

Conclusion of the analysis of the different options

The proposed project has the potential to bring about a meaningful change in the lives of the residents in KMC, particularly for the people living in the project area. The expected improvements in health, communication, employment and resilience building of these vulnerable communities in the context of climate change are sufficient reasons to select the “with project” option.

5. POTENTIAL ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS OF THE WACA ResIP2

The WACA ResIP2 will have both positive and negative environmental and social impacts on the beneficiary communities, which are presented below. These impacts will occur at different phases of the project’s development, namely: the planning phase, the construction phase, and the operation phase. However, at the current stage of project formulation, it is not possible to identify and evaluate precisely all the impacts likely to be generated by the project. The site specific socio-environmental impact assessments (Environmental and Social Impact Assessment (ESIA) to be prepared once the specific activity and sites are known, will provide more precise information on the potential impacts of the project.

5.1 Potential Positive Environmental Benefits

The table below provides a summary of the potential positive benefits of the project according to each project components.

Table 10: Project components and their potential positive impacts

Phase	Activity	Positive impacts
Implementation/ Civil works Phase	Strengthen Regional integration. Component 1	Development of partnerships with other actors in the region Formulation and implementation policies to improved institutional performance at regional level
	Strengthening the policy or institutional framework Component 2	Policy support and institutional development to (NDMA and MECCNAR Climate change Secretariat) at national level Establishment and strengthening of national disaster risk management

	<p>Component 3: Strengthening National Physical and Social investments.</p> <p><i>Sub-component 3.1: Physical investments</i></p>	<ul style="list-style-type: none"> -Employment opportunities for the community members; -Training and increasing capacity of local employees of the project; -Development of temporary economic activities in places where the civil works are taking place- restaurants, food vendors and other petting trading, renting of houses; -Increased income in the local economy
	<p><i>Subcomponent 3.2: Social Subprojects</i></p>	<ul style="list-style-type: none"> - Skills development for beneficiary communities in the maintenance of drains and other infrastructure; - Training in natural resource management including biodiversity conservation; -Sensitization of the communities on the need for improved waste management; - Increased income in the local economy
<p>Operational Phase</p>	<p>Component 1: Strengthen Regional integration.</p>	<p>Improved resilience of coastal communities through new partnership developments and improved policy interventions</p>
	<p>Component 2: Strengthening the policy or institutional framework</p>	<ul style="list-style-type: none"> --Improved coastal management through strengthening national policies and institutions to address flood and coastal risk management and development at national level, Improved policies and institutions for coastal management - - Improved resilience climate change impacts and response to disasters through policy support to NDMA and MECCNAR Climate change Secretariat) Improved resilience to climate change impacts and to disasters - Availability of quality hydro-meteorological data and early warning information to support climate change resilience.
	<p>Component 3: Strengthening National Physical and Social investments.</p> <p><i>Sub-component 3.1: Physical investments</i></p>	<ul style="list-style-type: none"> -Reduced risks of flooding and/or erosion -Improved waste management - Reduced pollution from uncontrolled storm water runoff -Reduced economic losses due to flooding and erosion -Attractive and livable environment for residents and tourists -Improved communications linkages among communities through construction of bridges connecting communities

		-Enhance socio-economic development of the area -Improved public health conditions - Improved access to schools during the rainy season
	<i>Subcomponent 3.2: Social Subprojects</i>	- Improved natural resource management -Increased resilience of communities to the impacts of climate change -Greater awareness of biodiversity, particularly for species in danger or under threat

5.2 Potential negative environmental and social risks and impacts

A summary of the major negative environmental and social impacts of the construction component is provided below. These negative impacts can arise during the preparatory phase, the construction phase and the operational phase. The environmental and social screening process proposed in this ESMF will ensure that the potential negative impacts are identified, and appropriate mitigation measures instituted as recommended in the table below.

5.2.1 Potential negative environmental risks and impacts

The potential negative environmental risks and impacts of the project include the following:

i) **Air quality impacts**

Air quality is likely to be degraded by dust and exhaust fumes during the land preparation and construction phases including excavation works, terracing, concrete preparation. These impacts can occur either in the form of dust emissions or in the form of gaseous emissions by the construction equipment and machinery. Dust emissions can be the cause of lung infections/ respiratory health issues for site personnel, as well as for people living in the vicinity of the work zones and therefore require measures to mitigate the impact.

ii) **Noise and vibration**

The construction of bridges and expanding the banks of the stream will be taking place in densely populated areas with hardly any good roads. The repeated passage of construction trucks and the operation of construction machinery and equipment (generators) for digging and leveling the banks of the stream will make a lot of noise and vibrations that will be inconvenient for the residents, particularly for those living with their families very close to the work site. Workers on site and animals in the vicinity will also be affected. For the birds, the noise from the construction site will generally scare them away especially those that come to feed and breed in the estuary. This point was raised during the stakeholder consultations with the Gambia Bird Watchers' Association at the Kotu stream estuary.

iii) **Loss of Vegetation and Wildlife habitats**

Expansion of the banks of the Kotu stream, the creation of the proposed river park and sites identified for the construction of bridges, the construction of the contract's base camp, as well as the main and secondary drainage may result in the loss of trees and natural habitats that can affect dependent wildlife species. As mentioned above, Kotu Stream catchment area is particularly important for the avifauna for feeding as well as breeding especially around the estuary and it is visited both by our local species as well

as Palearctic species that either spend the summer months here or pass through on their way to other destinations further south. Some of the birds that frequent the Kotu Stream catchment include herons, Cormorants some of which are already categorized as endangered in the IUCN. These include the black crowned crane (*Balearica pavonina*), the cormorants (*Phalacrocorax lucidus*). Similarly the destruction of habitat may also affect reptiles such as turtles Loggerhead and Olive ridley turtles are also in the category of endangered species in the IUCN Red list.

Soil and water pollution

During the construction phase, inadequate management or handling of wastes including hazardous substances such as used engine oil could lead to accidental spills or leaks, with potential contamination of soils, surface, and groundwater. Accidental spills during the refueling of machines and trucks can result in the spill of hydrocarbons which can contaminate the ground as well as the ground water resources. The proximity of the Kotu Stream to the work site will make such spills particularly significant because of its potential impact on the aquatic life and the vegetable growers in the area.

Cleaning the stream will have the advantage of improving its drainage capacity, which will reduce the risks of flooding whilst enabling it to transport and deposit more nutrients downstream that support the food chain on which depends the fauna, particularly the birds and fish in the estuary. The cleanup will also provide improved water quality, which is necessary for the fauna and flora that are dependent on this ecosystem as well as the small ruminants (goats and sheep) that feed on the banks and drink from the stream.

iv) Improper waste management

Already poor waste management is a serious health hazard and a major obstruction of the flow of the stream. During construction, more waste will be generated during the cleaning and widening of the drainages, the construction of bridges and the proposed river park, which will require land clearing and removal of trees. In addition to these wastes, there are the wastes from the contractor's machinery, which will include liquid (engine oil and fuel) as well as solid wastes (unused construction materials, packaging materials). Unless the waste is removed from the construction sites and properly disposed of they will have serious negative environmental effect with health risks for both humans, livestock and wildlife.

The Kanifing Municipal Council is responsible for solid waste disposal within the municipality and for this purpose garbage trucks visit households on a weekly bases to collect waste, which is transported to Bakoteh dumpsite. Recently, to help reduce the collection costs, the Council has started charging a fee for each collection trip. Even if the number of garbage were enough, there is the problem of access to some areas in the project intervention because of the bad roads, especially during the rainy season.

It is estimated that KMC trucks only collect 35 % of the waste generated, which leaves a substantial amount of uncollected waste.²¹ Because of this situation, many of the residents in the project use kotu Stream and its banks as a dumpsite. In addition to the indiscriminate waste dumping there are three other dumpsite in the project area located at Bundung Farokono/ Sukuta Nema, Bundung Farokono and Bundung Bore hole near the culvert. All these sites are situated within the Kotu stream area and in close proximity to dwelling houses with no management in place for these sites.

The challenges to waste management include the limited capacity of the personnel in charge who are not trained on waste management and few have knowledge of public health. The equipment used for

²¹ The Mapping and Documentation of Dumpsites that cause, or have potential to cause flooding-NEA-April 2014

waste collection and disposal are grossly inadequate and inappropriate final disposal. Finally, there is insufficient sensitization of communities on the need of proper disposal of waste.²²

5.2.2 Potential negative social impacts

The negative social impacts include the following:

a) Loss of land and other assets or restriction of access to livelihood

These risks are associated with compulsory land acquisition or restriction of land use or involuntary resettlement and may result in economic displacement or physical displacement, which could be either temporary or permanent. Widening the profile of Kotu stream, constructing primary and secondary drainage systems and developing a river park may require land that can result in temporary or permanent displacement of people such as the rice and vegetable growers on the banks of the stream. The potential impact could increase poverty, social conflict etc.

b) Labor risks associated with lack of equal opportunity, transparency, and discrimination especially against vulnerable groups (women and youth)

These risks relate to the non-observance of the principle of equality, nondiscrimination and transparency are in the hiring of project workers which should be carried out without regard to personal characteristics that are unrelated to the inherent work requirements. This is a particularly sensitive issue as youth unemployment was raised in many of the public consultations. There are also risks relating to poor management of workers in terms of nonpayment/late payment of salaries and overtime and not providing employees with a written contract and not explaining to them in a language the worker understands their entitlements and benefits as well as other rights. Finally, there are the risks of child labor.

c) Risks of Sexual Exploitation and Abuse/Sexual Harassment

Labor influx may increase the risks of SEA/SH especially because of the high level of poverty in the area. Any SEA/SH risks relating to project activities will be addressed in the SEA/SH Prevention and Response Action Plan which is annexed to the present ESMP and will be included in all Environmental and Social Management Plans (ESMP). In addition, every worker will be required to sign a code of good conduct with clear defined sanctions for failure to abide by the code. As part of monitoring activities, the social and environmental specialists will conduct spot checks to ensure that rules are not violated, and in cases where they are, swift actions will be taken to respond and resolve them.

d) Risk of exclusion of vulnerable and disadvantaged groups and individuals

This category of people such as widows with large families, women farmers who work on the banks of the stream and family heads aged over 70 years with no support are more likely to suffer more from the negative effects of the project. Generally, they have limited livelihood alternatives and adaptive mechanisms in the context of high population density, and they are also more likely to be excluded from the general consultation process and as a result, their concerns and priorities may not be adequately taken into account during project preparation and implementation.

e) Risks of Communicable Diseases including COVID-19, sexually transmitted diseases (STDs) and sexually transmitted infections

²² ibid

The risk of spreading communicable diseases is always present irrespective of the duration of project activity and increases with the importation of workers to communities. Communicable diseases of most concern, especially during the implementation and operation phase of this project are COVID-19 especially for local community elders and persons with pre-disposed conditions and sexually transmitted diseases (STDs), which may increase in occurrence because of the influx of labor outside the community.

f) Risks of accidents for project workers and community members

In the exercise of their duties, workers engaged by the project can be involved in accidents including road traffic accidents caused by non-compliance with the rules of the road, faulty rolling stock, and driver indiscipline. Similarly, members of the community may be victims because the vehicles and equipment will be operating within a densely populated areas lacking good roads.

g) Risk of Inter- community conflict

This may arise because of the lack of clarity on the ownership status of the land along the banks of the stream and lack of a clear demarcation of the exact land borders with many illegal settlements.²³This situation can become conflictual especially when land acquisition and compensation payments are involved.

h) Community health and safety

The presence of many workers within the community and their interactions with them may increase the risk of transmission of communicable diseases, especially COVID-19, sexually transmitted diseases (STD) and sexually transmitted infections. There may also be labor influx, which increases the risks of disruption of social cohesion in the community.

i) Occupational Health and Safety (OHS) Risks

Since most contracted workers are likely to be unskilled and untrained, there is a risk that some accidents may occur that can lead to injuries. All contractors will be required to develop and implement written labor management procedures, including procedures to establish and maintain a safe working environment as per requirements of ESS2.

5.3

5.4 Mitigation measures for potential risks and impacts

The environmental and social risks identified above will be addressed by putting in place specific mitigation measures to avoid or minimize the potential impacts of the project activities. The table below provides a summary of the proposed measures.

²³The Survey and Recommendations of the Kotu Stream Study: Ministry for Local Government and Lands-Department of Physical Planning and Housing, May 1995

Table 11: Potential negative impacts and mitigation measures for WACA InsP2

Phase	Activity	Potential Impact	Mitigation measures
Pre-construction	Selection sites for the bridges, the river park drainage canals areas for expanding the banks of the stream etc.	<p>Loss of land and other assets or restriction of access to livelihood</p> <p>Inter- community conflict over land ownership</p>	<p>Adequately sensitize communities and prepare and implement a resettlement plan for compensation of PAPs for assets lost</p> <p>Sensitize communities and make use of the GM to be set up by the project to resolve disputes about boundary and ownership claims</p>
	Land clearing and preparation: bulldozing, excavating, and backfilling with earth in expanding the banks	<p>Air and Dust pollution</p> <p>Loss of vegetation on construction site</p> <p>Accumulation of debris</p>	<p>Use of masks and other protective gear</p> <p>Compensatory replanting of trees in public institutions. This should be determined in consultation with appropriate lands and forest authorities. In case the trees are part of community lands and individual properties, replacement should be done in consultation with the community and/or individual owners.</p> <p>Institute measure as part of the waste management plan to collect and adequately dispose of the waste and other debris</p>
	Transportation of materials materials	Disruption of community life resulting in community hostility and lack of support for project	<p>Undertake adequate sensitization from start and promote active consultation and participation of the community in the project and also sensitize the workers about the community values and expected standard of behavior prior to the start of civil works.</p> <p>Demarcation of diversions to avoid road works</p>
		<p>Risk of materials falling and hurting somebody</p> <p>Potential pollution of the quality of surface and groundwater</p>	<p>Ensure the materials are properly covered to avoid litter on the roads</p> <p>Install work sites far from waterways</p> <p>Regular collection of work sites refuse to be sent to authorized dump. Ensure adequate spacing between latrines and water supply points</p>

Construction	Civil works - expanding the banks, constructing the bridges and the river park	Poor waste management	Require the contractor to prepare a waste management plan to ensure segregation, collection and disposal to authorized refuse dumps or recycling of materials, treatment of organic waste and separation and storage of hazardous waste in a non-leaking bonded area. The plan should also include the management of used oil in the light of the highly environmentally sensitive
		Air pollution due to vehicle rotation, noise, dust etc.	The following steps will be incorporated in the HSSE site inspection tools which Contractors will have to abide by; Traffic Management around Planning, Routing, Turning areas, Delivery Management, Unloading area, Pedestrian Segregation, Access and Signage and traffic control around the site controlled (speed limited) to 30 km/h when crossing a town; on site speed limit will be 20 km/h..
		Pollution and noise nuisances; degradation of the living environment	Put in place a system to reduce noise and sensitize the operators of these engines, ensure the use of equipment fitted with mufflers /screens, ensure the use of vehicles that are regularly serviced, ensure that workers use ear plugs when operating noisy machines/vehicles. All used oil must collected and stored safely in a clean container with tight –fitting lid before being recycled or eventually disposed of in an environmentally compliant and safe manner.
		Impacts on protected areas and habitats for rare species or of ecologic or domestic importance.	Contractor must obtain building materials from registered quarries and work closely with wild life and forestry specialists
	Recruitment and deployment of workers in communities	Risks to public health and safety in communities from COVID-19 , STDs/STIs from workers	Use of warning and safety signs before commencement and during the works to inform and warn the public of risks and means of avoidance.

			<p>Initiate sensitization and education programs for communities and workers on the risks of COVID-19 infection, the health guidelines, and the dangers of SDT/STIs and measures to address. With respect to COVID -19 workers should carry face masks, use antibiotic hand wash and practice social distance if they have to work as a group.</p> <p>Sensitize communities on prevention and response actions related to risks for HIV/AIDS transmission and SEA/SH, codes of conduct, and safe and confidential GM complaint procedures for SEA/SH claims</p>
	Work on the construction sites	OHS risks with respect to safe working environment, personnel protection, etc.	<p>All contractors will be required to develop and implement C-ESMP, in accordance with the Project ESMP, defining procedures to establish and maintain a safe working environment as required under ESS2.</p> <p>All contractors will be required under the ESMP to ensure workers use basic safety gears, receive basic safety training and other preventive actions as provided in the Project ESMF as well as the World Bank's Environmental, Health, and Safety (EHS) Guidelines.</p> <p>All Contractors will have to abide by the following;</p> <ul style="list-style-type: none"> -Site accommodation (toilets, canteen, water, dry clothing, cleanness) -General appearance of the worksite (clean/untidy, fencing) -Materials storage (protected, tidy, stored correctly), slip, trip and fall risks (protruding bars, cable management) -Security, site boundaries (clearly marked/defined, safety signage displayed, security arrangements), lighting
		Non- use of local workers	Prioritize hiring local labor and ensure transparent and fair hiring practices, including the recruitment of women
		Disruption or destruction of sites of cultural, historic, or religious importance	Avoid siting the facilities in places that will impact historic, cultural, or traditional use.
		Chance finds of cultural & historic artefacts	Apply the required procedures as defined in the present document which is in line with the NCAC Act 2003 and explained in Annex 11

		Risk of child labor	Contractor to ensure that any person working or providing services is above the minimum age of 18. Similarly any temporary replacement should meet this condition and proof of age should be provided i.e. birth certificate/ national ID.
		Risk of non-payment of work/services rendered by community members and other workers	Ensure that there is a valid contract for the work and that communities are sensitized adequately about the grievance mechanism, on how to lodge complaints and encourage them to do so for such cases.
		Risk of discrimination against vulnerable groups-women and people with disabilities	Ensure that the recruitment process is fair and transparent giving equal opportunity and that vacancy announcement is accessible to all in a timely manner. Ensure that ramps exist in buildings or wheelchairs are available to facilitate moving around. For information access, provide information to workers and the community members in the language they understand and in a format that is accessible.
Post –construction/ Operation	Maintenance of the drainage canals	Failure to carry out the maintenance work	Prepare and equip the local communities to participate in the regular maintenance of the drains
	Decommission of the works	Risk of not cleaning construction sites	Remove and clean the work sites of all construction debris
		Nonpayment of work and services rendered to the contractor	Ensure that the workers and subcontractors are fully paid before the final payment of the contractor

CHAPTER 6: ENVIRONMENTAL AND SOCIAL MANAGEMENT PROCEDURES

Both the environmental and social risk category of the project is **high** and the environmental and social management procedures proposed below describe the screening process for the different activities and the institutions arrangements for implementing the ESMF as well as the subproject ESMPs. The chapter also examines the capacity needs of the different stakeholders and proposes a training program.

6.1 The environmental and social screening process

The sections below illustrate the stages of the environmental and social screening process for this Project leading to the review and approval of the WACA 2 project activities to be implemented. The purpose of this screening is to determine which activities are likely to have negative environmental and social impacts and to determine appropriate mitigation measures for activities with adverse impacts. The mitigation measures are to be incorporated into the project as appropriate; The screening process will also include the review and approval of the project's proposals; and to monitor environmental and social parameters during the implementation of activities; Provide cost estimates and timelines for the implementation of the proposed mitigation activities. This screening process will be done with the participation of affected communities and the support of the Regional Environment Officer.

The extent of environmental and social work that might be required prior to the commencement of the projects depends on the outcome of the environmental and social screening process described below. Environmental and social clauses (**See Annex 6**) will be included in the tender and contract documents for the attention of the contractors. The clauses are specific to all site activities that may be sources of environmental and social nuisance.

The environmental and social management procedures will be conducted according to the following steps:

Step 1: Screening of WACA 2 subproject infrastructure and sites

All sub-projects will be screened to determine the extent of their potential environmental and social risks using the Environmental and Social Screening Form (attached as **Annex 3**). The environmental and social specialists within the PIU will be responsible for this initial screening and will give the risk categorization of the proposed activity in accordance with the World Bank's risk categorization indicated below.

High risk: these are investment activities where the negative environmental and social impacts are considered significant, irreversible, diverse or unprecedented that may affect an area broader than the sites or the facilities subject to the physical works. In this case, a full environmental and social assessment will need to be carried out with an Environmental and Social Management Plan (ESMP). Where physical and/or economic displacement is involved a Resettlement Plan (RP) will also be prepared in line with the Resettlement Policy Framework (RPF) prepared for the project.

Under national regulations, sub-projects that have similar potential environmental and social impacts are also required to prepare a detailed impact study accompanied, if necessary, by a Resettlement Plan.

Substantial risk: subprojects activities with significant environmental and social impacts and risks but that are reversible and location specific. An in-depth impact assessment will therefore be required to evaluate the impacts and propose management measures. In the event of physical or economic displacement, the ESIA/EMP will be supplemented by a Resettlement Plan (RP). *Under national regulations, these projects are subject to authorization and require a detailed impact study and, if necessary, a Resettlement Action Plan.*

- **Moderate risk:** the investments/subprojects have limited environmental impacts, or the impacts can be mitigated by applying measures or changes in their design. *Under national regulations, these sub-projects activities require an environmental impact statement or the implementation of simple mitigation measures.*

- **Low risk:** investments/subprojects that do not require an environmental and social study. *This category is equivalent to low-risk sub-projects with minor negative impacts on the biophysical and human environment. Under national legislation these investments do not require an ESIA nor an environmental impact statement.*

The completed screening form shall be submitted to NEA for validation.

Any sub-project with a High or Substantial-risk rating will require, before implementation, further clearance of the World Bank.

Step 2: Validation of the selection and environmental and social classification of activities

The completed screening forms will be submitted to the NEA for approval by the Environmental specialist of the PIU. The NEA will review the form to ensure that all planned activities are screened and that the risk category is appropriate. The risk category will determine the environmental and social work required and recommend whether: (a) no environmental work will be required; (b) the implementation of simple mitigation measures will be enough; or (c) a separate environmental impact assessment EIA will need to be carried out.

In cases where the planned activities will require an EIA, the Project Coordinator will submit the final screening report to the World Bank for Non Objection.

Step 3: Implementing the approved Screening Report

According to the results of the screening process, the following environmental work may be carried out:

(a) Application of simple mitigation measures: Activities categorized as moderate or low category might require the application of simple mitigation measures outlined in the Environmental and Social Screening Checklist (ESSC). In situations where the screening process identifies the need for land acquisition, the Social Specialist within the PIU shall prepare the TOR for the preparation of RP to be carried out by consultant in line with the provisions of ESS1

(b) Carrying out Environmental impact assessment (EIA): In cases where the results of the environmental and social screening indicates the risk category as High or Substantial risk category, then an ESIA will need to be prepared. The Environmental and social specialists of the PIU will prepare the Terms of Reference for the study and submit to the NEA for review and approval. In accordance with national legislation, the NEA will notify the PIU of any amendments or comments to the TOR which will need to be addressed before approval. The Project Coordinator shall submit the TOR to the World Bank for No Objection. A model TOR for an Environmental and Social Impact Assessment (ESIA) is attached as **Annex 4)**

The ESIA will identify and assess the potential environmental and social impacts for the planned construction works, assess the alternatives design solutions and proposed mitigation measures, as well as the management and monitoring measures to be put in place. These measures will be quoted in the Environmental and Social Management Plan (ESMP) that will be prepared as part of the ESIA for each activity. The ESIA will be carried in accordance with the national environment regulations and the provisions of ESS1. An indicative outline of an Environmental and Social Management Plan (ESMP) is attached **Annex 5.**

As part of the preparatory process, the beneficiary/affected communities and other stakeholders must be consulted in order to provide them information about the proposed project activities, its potential and social impacts and their views on the proposed mitigation measures.

Step 4: Review, approval of ESIA reports and disclosure

The draft ESIA report will be submitted to the Project Coordinator for review. After the internal review the Project Coordinator shall submit the draft report with their comments to the NEA for validation.

These review processes should ensure that all environmental and social impacts have been identified and that effective, realistic, and feasible mitigation measures have been proposed for the implementation of the proposed activity. Once reviewed and endorsed the Project Coordinator will submit the report to the Bank for their approval. With this final approval of the study by all the parties concerned, the Project Coordinator shall apply to NEA for the issuance of an Environmental Compliance Certificate.

Step 5: Integration of environmental and social provisions in the tender documents

With the approval of the ESIA Report, the Environmental and Social specialists shall ensure that the recommendations of the Report are incorporated in the tender documents and ensure the inclusion of the environmental and social clauses (**Annex 6**) in the contracts and attach the ESMP prepared for the Subproject.

The cost of implementing the environmental and social measures must be included in the sub-project costs as a separate line item in the price schedule and the works specification document.

Step 6: Approval of the Contractors -ESMP

Before starting the works, the company awarded the contract shall be required to prepare and submit to the Supervising Engineer for approval a contractor Environmental and Social Management Plan (C-ESMP) which shall include amongst others an Environmental Assurance Plan (EAP); a Social and Gender Integration Plan (SIGP), Prevention and management of GBV/SEA/SH risks, a Waste Management Plan (WMP) and an Occupational Health and Safety Protection Plan (OHSP) and Community engagement plan. **Annex 7** presents the structure of the C- ESMP.

Once approved, the C-ESMP should be implemented by the contractor in accordance with the environmental and social requirements contained in the tender documents.

Step 8: Environmental and social monitoring and follow-up

Environmental monitoring of the activities will be conducted as part of the overall project monitoring system. Environmental and Social monitoring aims at checking the effectiveness and relevance of the implementation of the proposed mitigation measures. The monitoring will cover both the implementation and operational phases of the proposed infrastructures. The detail monitoring arrangements are presented in Chapter 8.

6.2 Responsibilities for the implementation of the environmental and social procedure

The PIU has overall responsibility for the implementation of this ESMF. However, implementation of the environmental and social mitigation measures will be the responsibility of the contractor who will be supervised by the Supervising Engineer on site and the environmental and social specialists within the PIU. The PIU will also be responsible for other social mitigation measures not covered and monitored by the contractor to ensure compliance with the ESMP.

Community leaders will also have the responsibility of ensuring that local members of the communities avoid work sites and report to PIU or relevant authorities, issues of concern related to the Project. The PIU and Contractor will engage the community regularly as an oversight measure in this regard, and conduct sensitization sessions to ensure communities are aware of reporting procedures and understand Project risks.

The table below presents the procedural steps, the institutional roles and the timeframe for implementation of the ESMF process.

Table 12: Summary of procedural steps and the timeframe for the Implementation of the ESMP

Step	Action	Responsible agency	Timeframe
1	Completion of the environmental and social screening form	PIU E&S risks and impacts management Team & NEA	Before the start of physical activities of an identified sub-project with a well-defined implementation site.
2	Validation of the site screening, environmental, and social classification of activities. Preparation and validation of TORs to develop the E&S risk mitigation instruments.	PIU Coordinator+ PIU E&S specialists + NEA & WB E&S Team	Before the start of physical activities of an identified sub-project with a well-defined implementation site.
3	Carrying out the environmental and social work (preparation of the risk mitigation instruments)	Consultant (to be hired by PIU)	Before the start of physical activities of an identified sub-project with a well-defined implementation site.
4	Carrying out the environmental and social work (preparation of the risk mitigation instruments)	PIU Safeguards Team _ NEA Safeguards Team WB E&S Document Review	Before the start of physical activities of an identified sub-project with a well-defined implementation site.
5	Public consultation	PIU E&S team and Consultants	During the preparation of E&S instruments
6	Review of the Environmental and Social instruments (Environmental and Social Impact Assessment (ESIA) or site-specific ESMP reports, RAP, including public hearings and dissemination, and obtaining the environmental authorization from NEA and the No Objection from the World Bank	PIU Safeguards Team _ NEA Safeguards Team WB E&S Document Review	Before physical start of civil works.
7	Disclosure of the document	PIU and WB	After approval from NEA and No Objection from WB
8	Integration of environmental and social provisions in the bidding documents	PIU Safeguards Team	Very early during sub-projects (activities) preparation & 3/5 months before the physical start of civil works
9	Implementation of environmental and social measures	PIU E & S and all other stakeholders	Throughout the Implementation of the sub-project
10	Preparation and implementation of the C-ESMP and OHSP	Contractor	Throughout the Implementation of the sub-project
10	Environmental and social monitoring and follow-up	Supervising Engineer, PIU Safeguards Team and NEA EIA Technical Working Group	Throughout Implementation

6.3 Institutional Arrangements for implementing environmental and social management measures

The implementation of the environmental and social risk management measures of the ESMF and the ESMPs for the different subprojects will include different institutions and the table below provides a summary of their institutional responsibilities.

Table 13: Institutional arrangement for environmental & social management

Institution	Responsibility for the environmental & social management of the Project
Project Steering Committee	<p>This will provide overall guidance and oversight of the project implementation of the project. It will be regularly informed of the implementation of the environmental and social the recommendations of the ESMF/ESMPs by the project and it will give the necessary directives to ensure that the laid down procedures are fully respected and that the implementation and monitoring program are effectively implemented.</p>
Project implementation Unit (PIU)	<p>In addition, the PIU reports to the steering committee and ensures that the World Bank and other stakeholders receive all environmental and social monitoring reports. The PIU will recruit (i) an Environmental Specialist (ES), (ii) a Social Specialist (SS), one GBV specialist, one Operational Health and Safety Consultant, and one Stakeholder Engagement/Communications Consultant</p> <ul style="list-style-type: none"> ● The Project Coordinator is responsible overseeing the work of the E & S Specialists; and for the publication of the safeguard documents drawn up. He/she is also responsible for submitting the documents to the institutions (NEA, relevant government agencies) and to the World Bank. The project coordinator will also recruit NGOs for sensitization, mobilization, and social support; training of other actors in environmental and social management; monitoring/evaluation of the implementation; it will ensure the dissemination of the ESMF and will establish memorandums of understanding (MOU) with the NEA for monitoring and evaluation of E&S safeguards compliance. ● The PIU Environmental and Social Safeguards Specialists have overall responsibility for the monitoring the implementation of the E&S measures set out in this ESMF, ESCP, LMP, SEP, RPF and other site specific environmental and social instruments to be prepared during project implementation. Health and Safety Specialist also to be recruited by the PIU will have overall responsibility for monitoring the implementation of the Occupational Health and Safety. They will also prepare quarterly monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project. They will be responsible for the preparation of the environmental and social screening of sub-projects. To this end, they will work in close collaboration with the National environmental agency (NEA). The three Experts (Environmental, Social and GBV) will ensure internal monitoring of the implementation of environmental and social measures. The two specialists coordinate the implementation of Information, Education and Awareness Programs in the communities on the nature of the works and the environmental and social issues at stake during the implementation of the project's activities. ● The Procurement Specialist of the PIU works with the Environmental and Social Safeguards specialists in the recruitment of consultants for environmental and social studies/services. He/she is responsible for the preparation of tender and

Institution	Responsibility for the environmental & social management of the Project
	<p>contract documents and ensures the integration of environmental, social, health and safety clauses in the tender documents and contracts</p>
<p>The World Bank</p>	<ul style="list-style-type: none"> ● Oversight of the Implementation of environmental and social requirements for the project ● Approval of prepared TORs for E&S studies ● Monitoring the progress of the environmental and social studies ● Verification of the conformity of the study with the terms of reference ● Verification of the compliance of the activities with the WB requirements, especially the environmental and social standards ● Supervision/implementation support mission for the assessment of field works and level of compliance
<p>The National Environment Agency</p>	<ul style="list-style-type: none"> ● The NEA in collaboration with the ESS and SSS will participate in the environmental classification of activities. It is responsible for: ● Validating the level of environmental and social assessment to be applied to activities ● Approval of project TORs for the ESIA study ● Approval of the ESIA ● Issuance of the Environmental and Social Compliance Certificate to the WACA2 isP2 and environmental authorizations for the implementation of activities ● Verification of compliance with the environmental and social specifications (ESMF) by the project and its contractors ● Monitoring, evaluation, and control (in case of ESIA or ESMP).
<p>Contractors</p>	<ul style="list-style-type: none"> ● The contracting companies shall prepare and submit the Contractor (C-ESMP) including all the site-specific plans for each activity of the project 30 days before the physical start of the civil works. They must carry out the environmental and social measures and respect the directives and other environmental prescriptions contained in the works contracts. To this end, the companies must have a Health, Safety and Environment Manager who will be responsible for implementing the various safeguard documents and drafting reports on the implementation of the said ESMP.
<p>Supervising Engineer</p>	<ul style="list-style-type: none"> ● Work closely with contractors and offices to ensure compliance with safeguards measures and implementation schedule ● Prepare monthly reports for submission to the PIU on the implementation of the mitigation measures ● The day-to day environmental and social management of the project will be carried out by the Supervising Engineer ● The Supervising Engineer ensure the completion of the required environmental and social studies, including the ESMP in accordance with the requirements of the World Bank's environmental and social standards. They will also ensure that the ex-post evaluation (external audit) is carried out.

Institution	Responsibility for the environmental & social management of the Project
	<ul style="list-style-type: none"> During construction phase, the engineering and control offices acts as project manager and ensures the effectiveness and efficiency of the monitoring of environmental and social measures and the consistency with the directives and other environmental prescriptions contained in the construction contracts. The control offices are responsible for monitoring and implementing the site specific ESMPs including C-ESMP, with a supervisor specialized in Health, Safety and Environment on their teams.
Civil Society Organizations	<ul style="list-style-type: none"> Civil society organizations (CSOs) and community associations: In addition to social mobilization, they will participate in raising awareness among the population and monitoring the implementation of the ESMF, particularly the ESMP, by challenging the main Project stakeholders. These civil society organizations (CSOs) will also participate in the implementation of the SEP, including communication and stakeholder engagement activities of the Project. These NGOs, CSOs and other environmental and social organizations will also be able to participate in the implementation of the ESMF measures.
Local authorities, Local communities	<ul style="list-style-type: none"> Municipal and area councils in Kanifing and Brikama respectively Support for the implementation of environmental and social measures in the field, including the pre-selection of micro-project sites Support in monitoring and reporting Assist in sensitizing the local communities and act as focal point for receiving complaints relating to the GM Establishment of Local grievance resolution committee to resolve disputes/complaints
GAMWORKS	<ul style="list-style-type: none"> Provide technical support to the PIU in the review of the TOR for the overseeing engineer Assist the PIU in the selection of contractors Review and advise the PIU on technical reports submitted by the Supervising engineer.

6.4 Capacity building, awareness raising, and sensitization plan

There is very limited understanding of recently introduced ESF of the World Bank among the staff of MECCNAR and the CPCU currently overseeing the preparation of the project and the implementing partners. As a first step, it is necessary to carry out a capacity assessment of the institutions concerned in order to determine the training requirements and provide training to ensure that the staff are able to carry out the roles assigned to them in the implementation of the safeguards policies. Such training should also include representatives of the relevant collaborating institutions and the beneficiary communities. **Table 14** below gives a list of topics for the training with recommendations for institutions that can be invited to send participants. Similarly, the contractors will be trained to enable them understand their roles in the implementation of the E & S instruments.

6.4.1 Assessment of the institutional capacity of the participating agencies

The capacity assessment to assess the ability of the institutions to adequately manage environmental and social aspects of the project and, if necessary, to identify the capacity building required in the implementation of the ESMF/ESMPs. The table below presents the results of the analysis of the environmental and social management capacities of the relevant institutions

Table 14: Assessment of the environmental and social management capacities of the key institutions involved in the implementation of the safeguards instruments

<i>Institutions</i>	<i>Role of the institution and its link with the Project</i>		<i>Environmental and social management capabilities</i>	<i>- Need for capacity building</i>
	<i>Assets</i>		<i>Limits</i>	
Ministry of Environment, Climate Change and Natural Resources	Ensures the management of the activities of the Environ. and Nat Resources sector	Has qualified personnel in the environment and climate change related issues	Insufficient understanding of the project's environmental and social issues and the World Bank ESF and the ESS including the management of SEA/SH risks	<ul style="list-style-type: none"> -Understanding of all E&S instruments prepared in the framework of the project -Environmental and social management procedures for sub-projects - Concept of environmental monitoring
National Environment Agency (NEA)	Responsible for overseeing the implementation of the NEMA, 1994 and EIA Regulations 2014	Has qualified personnel in environmental management of projects	<ul style="list-style-type: none"> - Financial and logistical resources constraints that affect proper monitoring of the implementation of E & S instruments of projects - Insufficient staff in the area of social risk management 	<ul style="list-style-type: none"> - Provide the NEA with financial and logistical resources to carry out its monitoring mission, - Training on the World Bank's new environmental and social standards and on monitoring and evaluation of project implementation. - Support in intervention means
Municipal and Area Council	Responsible for managing development at the decentralized levels including waste and disaster management	Has experienced staff in these area	Limited knowledge of the Environment and social risk management including cases of SEA/SH	<ul style="list-style-type: none"> Understanding of all E&S instruments prepared in the framework of the project -GM and procedures -Bank policies on SEA/SH

<i>NGOs and civil society</i>	Involvement in environmental protection at community level and can provide advisory services and Sensitization of the beneficiaries.	Active presence in the communities Experience in mobilizing communities	- Many of these NGOs are at a rudimentary stage of development, with limited technical and environmental capacity and limited financial/social human resources - Insufficient expertise in relation to environmental and social supervision	Training in environmental management, risk analysis and environmental issues Implementation and Monitoring of the GM - Implementation and monitoring of the action plan on SEA/SH risk mitigation
<i>GAMWORKS</i>	A non-governmental, public works construction institution, that provides public infrastructure and services	Qualified personnel to supervise construction works with experience in working on W/Bank project	Limited understanding of the W/Bank's ESF	Training in environmental management, risk analysis and environmental issues Implementation and Monitoring of the GM - Implementation and monitoring of the action plan on SEA/SH risk mitigation

6.4.2 Capacity Building Plan to improve the implementation of the ESMF/ESMPs

In the light of the capacity constraints identified, a capacity building program has been developed to respond to capacity constraints of the various institutions involved in the implementation of the project. The training will seek to strengthen the capacities of the project partners and beneficiaries in terms in the areas of:

- understanding the issues and challenges of environmental protection/management in general and those of the sub-projects to lay the foundations for sustainable management of natural resources
- Knowledge and understanding of the requirements of the World Bank's environmental and social standards, as well as the national legislative and regulatory framework in this area
- Implementation of the ESMF, particularly the procedure for the social and environmental review of sub-projects and the roles of the different stakeholders
- Procedures and tools for screening investment sub-projects according to applicable environmental and social standards
- Social and environmental monitoring of the implementation of mitigation measures for negative impacts of sub-projects
- Knowledge of the GM and procedures for managing grievances including complaints relating to SEA/SH

The table below includes the training modules, the target group as well as the related costs.

Table 15: Training modules and budget

Training and awareness theme	Time and estimated duration of Training	Participants	Organizer	Budget (US \$)
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Training on the World Bank's Environmental and Social Standards including the Environmental and Social Commitment Plan (ESCP)	During the first year of the Project implementation. Duration - 2 days	PIU Staff NEA MECCNAR staff KMC BAC WDC	Consultant World Bank specialists + 2 Support Consultants	7,000
Environmental and Social Assessment <ul style="list-style-type: none"> - knowledge of the organization and management procedures for conducting ESIA's, - Policies, procedures, and legislation on social issues in The Gambia implementation monitoring process <ul style="list-style-type: none"> - Knowledge of the ESIA - risk assessment, effective management of risks and negative impacts, environmental and social monitoring, and reporting 	Before the selection of sub-projects - Duration - 2 days	Implementing partners PIU NEA	PIU / WB	7,000
Awareness and advocacy on issues related to environmental and social aspects of the subprojects	Prior to the selection of subprojects - Duration - 1 days	Local Authorities, WDC Beneficiary communities	PIU	3,000
Training on natural resources and biodiversity conservation	Six months after the reception of civil engineering works- 2 days	<ul style="list-style-type: none"> - Stakeholders, PIU - Technical staff of the ministries concerned - Local communities - Municipal and Area council staff 	Consultant NEA PIU	6,000
Occupational Health and Safety Module: <ul style="list-style-type: none"> - Personal protective equipment - Workplace risk management, prevention of work-related accidents - Health and safety rules - Solid and liquid waste management - Emergency Preparedness and Response - Proper use of personal protective equipment - Safety and security of the population 	Six months before the start of civil works - 2 days	Companies (works manager, site manager)	Consultant PIU NEA	5,000
GBV risks <ul style="list-style-type: none"> - Awareness, prevention and mitigation of GBV/SEA/SH risks - World Bank guidance - Survivor Support - Complaint Management 	- to be delivered in a combined manner 3 day but also integrated into modules on social risks (in abbreviated form)	PIU Staff Regional Focal Points Companies (works manager, site manager)	PIU NGO	7,000

		Monitoring and control engineering office		
Total				35,000 USD

6.5 COVID-19 Mitigation Plan

The World Bank has developed a good practice note for the projects it funds to comply with COVID-19 prevention measures. The project will comply with these guidelines.

6.6 Procedure to follow in case of archaeological remains discovery (Chance finds)

During civil works, Contractor shall take all necessary measures to respect the cultural and religious sites (cemeteries, sacred sites, worship areas, etc.) in the vicinity of the works and not to damage nor disturb them. If, during the course of the civil works, remains of cultural, historical or archaeological interest are discovered, the Contractor shall follow the following procedure: (i) stop all works in the affected area; (ii) immediately notify the Supervising Engineer and take steps to protect the site from destruction. In this regard a protective perimeter shall be erected and marked on the site and no activity shall take place within it; (iii) refrain from removing and relocating the objects and the remains. Work must be suspended within the protective perimeter until the national agency responsible for historic and archaeological sites has given authorization to proceed. Details of the procedure, including a sample of the procedures to follow in cases chance finds are provided in **Annex 11**.

CHAPTER 7: PUBLIC CONSULTATIONS, PARTICIPATION, INCLUSION AND INFORMATION

7.1 Public Consultation and Participation

Consultations with stakeholders is an important aspect of ESS1 as well as ESS10- Stakeholder Consultation and Disclosure. These consultations provide an opportunity to inform the stakeholders about the project and its potential negative environmental and social impacts. The consultations also provide an opportunity for the stakeholders to express their views and concerns on these potential impacts as well as the proposed mitigation measures.

In preparing the ESMF, the consultant had consulted the different stakeholders including local communities guided by the WHO Advice and guidelines²⁴, the public emergency regulations and the World Bank Technical Note²⁵ on the consultations.

Public Consultations, Participation and Disclosure with the stakeholders

These consultations with the stakeholders including the disadvantaged or vulnerable individuals or groups including women, allowed stakeholders to express their views about the project, their concerns and the potential environmental and social risks and impacts of the project.

The communities were informed about all the project including its potential positive and negative impacts on the beneficiary communities. These included:

- a) The proposed objectives and activities of the project;
- b) The proposed activities that may impact land and other assets;
- c) Potential risks and impacts of the project on the physical environment and the human environment such pollution and land acquisition;
- d) The proposed risk management measures, to address the negative impacts;
- e) The GM to be setup to address grievances relating to project activities;
- f) The special case of vulnerable and disadvantaged groups who may be disproportionately affected by the adverse environmental and social impacts and may not fully benefit from project benefits;
- g) Complaints relating to SEA/SH and VAC;
- h) Communication with stakeholders.

Consultations with women, were organized exclusively for women and facilitated by a female member of the consulting team. These consultations helped highlight the special challenges faced by this group and the proposed measures that could address them.

During the consultations, the communities and other stakeholders welcomed the project and expressed the hope that it will bring an end to the annual floods and the connectivity difficulties in the area as well as employment opportunities especially for their youth. These points are summarized below.

- i. Fear of people losing their land and not be compensated especially for women rice and vegetable growers
- ii. The need for fair and equitable compensation taking into account the high cost of land in GBA;

²⁴ The World Health Organization. Coronavirus disease (covid-19) advice for the public. <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/advice-for-public>

²⁵ Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings.

- iii. The need to remove the waste and other obstructions such as buildings in the flood path to reduce flooding and encourage a healthy environment;
- iv. Improved crossings for humans and transport
- v. Youth employment;
- vi. Discrimination of women in accessing project benefits;
- vii. Provision for other forms of support to women who may lose their rice and vegetables fields.

The Consultant explained that any involuntary land acquisition for the project will be fully compensated at replacement cost to ensure a fair and equitable compensation. Furthermore, the affected persons can take up any complaints they may have including the compensation process and amount to the project's Grievance Resolution Committee. As regards, employment at construction sites, the contractor will be encouraged to employ local labor if they have the required skills for the jobs. In addition, the project will be implementing small scale livelihood improvement project which will give opportunities to improve their living conditions. On discrimination of women, the communities were reassured that the project has a special focus on women and youth who will be supported through training and provided opportunities in the social development subprojects.

7.2 Discussions with the women

The women participated in the mixed group meetings and in women's only group. The key issues raised at these meetings were the need to support women to benefit from the project. On the land issue, they insisted on the need to compensate people for their losses and warned that in some areas along the stream there are women rice and vegetable growers, which need to be considered for compensation if they lose the land they are cultivating. The land in question is in most cases on loan to them. These women and their families depend on these plots for feeding their families so the project should think of alternatives if they have to forego the land they are working on, they said. In some of the consultations, the women acknowledged the existence of sexual exploitation and abuse (SEA) and urged the project to take special measures to protect women especially the young girls who may be attracted to project workers. They also referred to employment opportunities for their children so they can help the family.

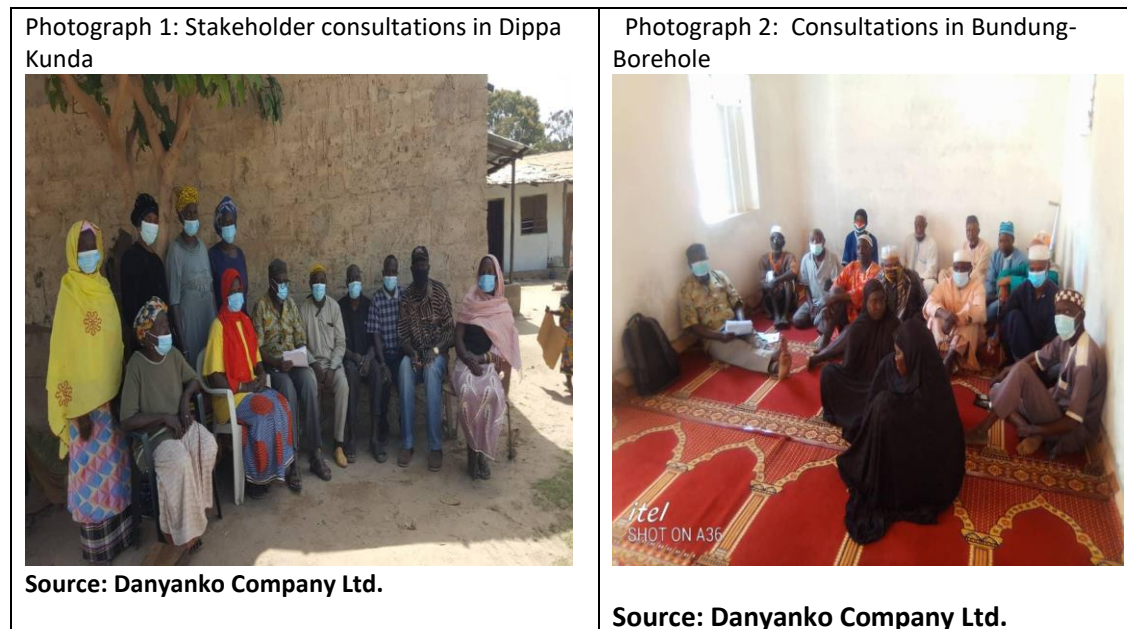
In response, the consultant reconfirmed the project focus on women and assured them that the project will fully compensate any land acquired and since in most cases the women are not the owners they will be compensated for the loss of livelihood if their land is affected. The consultant will recommend to the project to pay special attention to lands occupied by women farmers along the stream. On SEA/SH, the consultant explained that the project would put in place special measures to address these risks which include a grievance mechanism where they can lodge complaints relating to SEA/SH in confidential manner. The workers and their employers will also be required to sign codes of conduct to avoid SEA/SH and failure to respect this code will carry a penalty.

The Consultant documented each of these consultations and opened an attendance register to record the participants at these meetings and **Annex 8a** gives the dates for these consultations and the participants. The stakeholders consulted included government officials, communities, local government authorities. A total of 138 people were consulted and 53.6% or 74 people were women. A summary of consultations is attached as **Annex 8b** and samples of attendance register are attached as **Annex 8c**

At the institutional, the actors welcomed the project and explained the different roles that their institutions can play in support of the project. In some cases complained of constraints of limited capacity

and resources. This is particularly noticeable in the case of the Department of Physical Planning responsible for ensuring that physical planning regulations are respected, and NAWEC in respect of the operation of the sewage treatment plant at Kotu. Availability of land was also identified as a major challenge when it comes to construction of public facilities such as schools or expanding horticulture among the affected communities. A summary of the views expressed by the different institutions contacted is provided in **Annex 8b**.

Pictures about the consultation and some of the sites visited in the PIZ are given below.



CHAPTER 8: GRIEVANCE MECHANISM (GM)

The Grievance Mechanism (GM) is designed with the objective of resolving disputes at the earliest possible time before they escalate, to respond to complaint related to the project or associated staff and personnel, and for stakeholders to be able to engage the project and ask questions and raise concerns without fear of reprisals. Project-affected persons should be heard and be able to voice concerns, and as such, they must have access to fair, transparent, and accessible means to address their concerns and views related to the project.

The GM developed for this project aims to be effective and responsive to address project complaints and concerns at project-level so that grievances are not referred to the court system for resolution, which is often not timely, financially feasible or accessible to all. A functioning, inclusive and accessible grievance mechanism is essential for the social sustainability of the project.

Within the framework of the WACA ResIP II project in The Gambia, the grievance mechanism is based on an out-of-court complaint registration and management system. However, this mechanism provides an overview of the complaints management system that integrates environmental, social and GBV aspects. However, the grievance mechanism for project workers will be provided separately under the Labor Management Procedures prepared for this project. The grievance mechanism provided below will set out specific procedures to manage SEA/SH complaints ethically and confidentially accompanied by an appropriate response protocol allowing access to GBV services (at minimum medical, psychosocial, and legal) through referrals.

The Project will make available grievance forms in every affected community (Alkalo or WDC) as an accessible venue for filing a grievance and will discuss with the WDC and Alkalo requirements to consider

social distancing measures. A literate member of the WDC or the community will help in completing the forms. They will sign codes of conduct (to be developed) to ensure that they will respect the confidentiality of the complaints.

8.1 Principles of GM

The GM will adopt the following six core principles to enhance its effectiveness:

- a. **Fairness:** Grievances will be treated confidentially, assessed impartially, and handled transparently.
- b. **Objectivity and independence:** The GM will operate independently of all interested parties in order to guarantee fair, objective, and impartial treatment to each case. Officers working under the GM will have adequate means and powers to investigate grievances (e.g., interview witnesses, access records).
- c. **Simplicity and accessibility:** Procedures to file grievances and seek action will be made simple enough that project beneficiaries can easily understand them. Project beneficiaries will have a range of contact options/reporting channels including, at a minimum, a telephone number, an email address, and a postal address. The design of the GM will be such that it is accessible to all stakeholders, irrespective of where they live, the language they speak. The GM will not have complex processes that create confusion or anxiety (such as only accepting grievances on official-looking standard forms or through grievance boxes in government offices). Safety and accessibility of contact options/reporting channels will be confirmed during community consultations including the ones with women only groups facilitated by a woman.
- d. **Responsiveness and efficiency:** The GM will be designed to be responsive to the needs of all complainants. Accordingly, all officers handling grievances will be trained to take effective action upon, and respond quickly to, grievances and suggestions. Officers in charge of SEA/SH complaints will receive additional training on confidential handling of sensitive information and survivor-centered approach.
- e. **Speed and proportionality:** All grievances, simple or complex, will be addressed and resolved as quickly as possible. The action taken on the grievance or suggestion is expected to be swift, decisive, and constructive.
- f. **Participatory and socially inclusive:** All project-affected persons – community members, members of vulnerable groups, project implementers, civil society, and the media - are encouraged to bring grievances and comments to the attention of project authorities. Special attention is given to ensure that poor and disadvantaged groups, including those with special needs, can access the GM.

8.2 Objectives of Grievance mechanism

The grievance Mechanism aims to provide an operational, fast, efficient, transparent and inclusive grievance registration and management system that allows for the prevention or resolution of grievances and conflicts through negotiation and dialogue with a view to an amicable settlement, except for SEA/SH related grievances for which the reporting, referral and handling of grievances are governed by specific principles and procedures.

One of its main objectives is to avoid resorting to the judicial system and to seek an amicable solution in as many situations as possible (except for complaints related to GBV/SEA/SH where an amicable solution

is not recommended), thus preserving the interest of the complainants and the image of the project by limiting the risks inevitably associated with legal action. On the other hand, in the case of a complaint related to GBV/SEA/SH, recourse to the courts is possible if the complainant wishes to pursue the matter, even as a last resort.

This mechanism is not intended to be a mandatory prerequisite, let alone to replace the legal channels for managing complaints and conflicts. However, it does ensure that concerns/complaints from stakeholders related to Project activities are promptly listened to, analyzed, addressed, and documented in order to detect causes, take corrective action, and avoid injustice or discrimination and aggravation beyond the Project's control.

The key objectives of the GM are:

- Record, categorize and prioritize the grievances according to severity and immediacy of the issue, and provide timely, fair, accountable resolution to grievances at the project level
- Ensure multiple and accessible channels for all stakeholders, especially those who are vulnerable or disadvantaged
- Settle the grievances via consultation with all stakeholders (and inform stakeholders of the solutions, obtain their views on the outcome, and ensure they understand possible next steps to escalate if they are not satisfied with the outcome)
- Prevent the risks and mitigate the impacts of SEA/SH by facilitating access to GBV service, raising awareness on SEA/SH amongst workers and community and enforce sanctions against perpetrators in line with the code of conduct of the project
- Forward any unresolved cases to the relevant authority
- Regularly analyze grievances to assess if there are systemic issues in the project that should be addressed to mitigate the same types of issues being reported

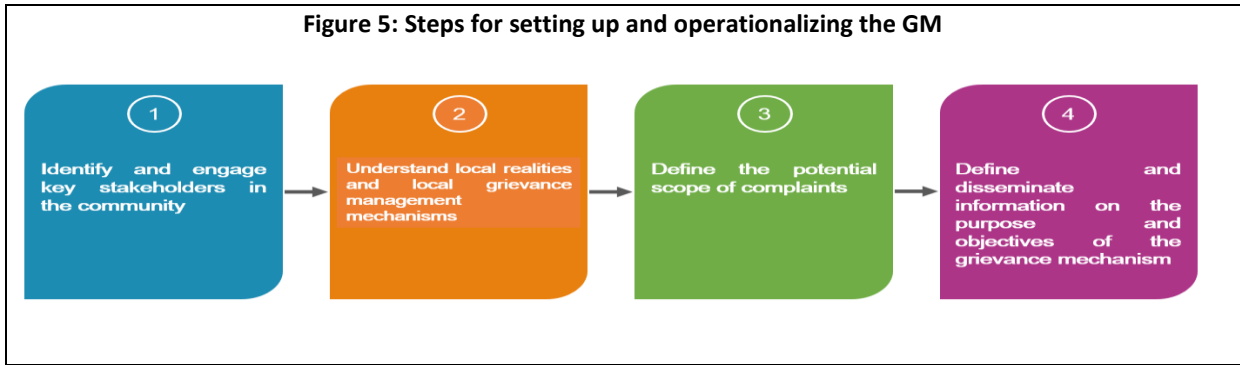
The GM operates within the existing legal, cultural and community context of The Gambia. It will also take into consideration World Bank procedures and recommendations regarding complaint handling and monitoring and reporting on their resolution.

The specific nature of sexual exploitation and abuse and sexual harassment requires appropriate measures for reporting and handling these allegations safely and ethically through the complaint management mechanism. The mandate of an SEA/SH complaint management mechanism is to: (1) allow for multiple entry points confirmed as safe and accessible by women during consultations; (2) allow for connections between the victim and SEA/SH service providers, including a link to the national justice system (only with the informed consent of the person involved), (3) allow for a dedicated team to determine the likelihood that an allegation is related to the project using confidential and survivor-centered procedures.

8.3 Structure of the GM

This procedure is non-judicial and is based on local complaint management procedures that are considered effective and practical in anticipating and resolving disputes of any kind, except for SEA/HS cases.

Figure 5: Steps for setting up and operationalizing the GM



It is essentially based on two principles: mediation and conciliation.

8.3.1 Triage of complaints and grievances

Registered complaints and grievances will first be screened by the registration officer to determine who is responsible for handling them. Complaints and grievances that can be handled at the local level will be handled at the village/community level first. Complaints that fall under the responsibility of other entities or those related to GBV/SEA/SH will be directly transmitted to the PIU, which will be responsible for sending them to the person(s) in charge of processing them, including the service providers, in complete confidentiality. The mapping of the services authorized to take charge of possible cases of SEA/SH is a prerequisite for the PIU to work on.

On the other hand, when a traditional complaint (as opposed to an SAE/SH complaint) is minor, it can be resolved through an amicable solution (see section below). This solution can be formulated with the help of traditional authorities (village chief or "committee" and traditional or regal king) and community members at the village or sector level, or via the administrator, but does not need to go through PIU validation. However, the history of complaints should be recorded in a register that can be accessed for monitoring purposes at a later date.

The process includes the following steps:

- Verification that the complaint has been entered in the register available at the Village or sector;
- Production, if necessary, of any records considered useful to substantiate the claim;
- Analysis of the complaint to determine its content;
- Convening the complainant.

8.3.2 Registration of complaints

The PIU/WACA ResIP II Project in the Gambia will provide stakeholders with a toll-free number dedicated to the grievance mechanism. Access to this number will be free for complainants.

In addition, for each level of grievance management, the PIU will establish a grievance register (see annex).

The complaint log is divided into two sheets: a "complaint" sheet and a "response" sheet. Each sheet is self-copying in triplicate. In this way, the complainant gets one copy of the complaint, one copy is sent to the WACA ResIP II Project PCU in The Gambia, and one copy remains in the register at the sector or section or village.

The existence of this register at the level of each sector and section and the conditions of access (where it is available, when one can access the agents in charge of registering complaints, etc.) will be widely disseminated to the communities living in the project intervention sites during the consultation and information sessions. The registry will be opened as soon as project activities begin in a given area. Complaints related to SEA/SH will be registered separately.

On this basis, the complainants will formulate and file their complaints with the designated entities. The complaint will be duly registered in the register specially opened for this purpose. The Chairman of the

complaints management body is responsible for this register, which will also be regularly monitored by the PIU. The addressees of the complaints will send back a reasoned response to the complainants within the time limits prescribed below at the most after receipt of the complaint. This means that all contact information (reference numbers, names of members, position, telephone number, home addresses) of the various resettlement management bodies will be given to the population in anticipation of this eventuality.

Complaints from third parties can be in the form of verbal, written, emails and letters to the designated entity, and phone calls to the different levels of complaint management. The WACA ResIP II Project PIU in The Gambia must establish a system for receiving and managing complaints. The complainant should receive confirmation of receipt of the complaint and a time frame for resolution. Preferably, the timeframe for resolution of complaints should be a maximum of five (5) working days. Anonymous complaints will be filed using the same communication channels described above. Grievance boxes will also be made available to stakeholders in the complaint management mechanism. Grievance books will be submitted to the relevant district, village and sector chiefs. Below, the procedure for submitting and resolving complaints starting at the community level is described. The procedure for submitting and resolving complaints to the various stakeholders will be described in a project manual.

In the case of complaints from illiterate people, the PIU is committed to putting in place the necessary resources to transcribe the complaints of these people in writing on the designated form. The PIU will also ensure that responses are provided to grievances from the bodies listed in section 6.3.3.

8.3.3 Complaint settlement

Out-of-court settlements will be made at the following levels: (i) local/community level; (ii) the communal level, which includes Kanifing Municipal Council//Brikama Area Council and the NGOs and complainants; and (iii) Governorate level through the Governor of the region or the sector administrator and the PIU.

The project, through the PIU, will assume the formation of the out-of-court settlement entities and the costs associated with their operation.

⇒ Treatment of complaints at the first level

The first review will be done by the Village/Community Mediation Committee within 5 working days. If it determines that the request has substance, the complainant will be provided with appropriate reparations. This committee will include at least the following persons:

- Community Delegate or Village Chief/Section "Committee" Chairman
- a representative of the/village/committee of elders
- two representatives of the people, chosen for example from the community-based organizations and women, as appropriate,
- a representative of the WACA ResIP II Project PIU, Secretary.

This committee will include two or three women with experience in gender and GBV who will be the SEA/SH gatekeepers whose main role will be to receive SEA/HS complaints and refer survivors to independent Third Parties or SEA/HS service providers. The PIU will implement a capacity building program for its stakeholders who will be responsible for ensuring that the complaints mechanism functions in accordance with the principles of fairness, transparency, efficiency, confidentiality and documentation of all complaints or feedback requests.

Complaints related to SEA/HS should not be handled at the community/village level. The role of this body, including the SEA/HS entry points, will be to refer the complainant to the independent service providers or Third Parties responsible for the care of SEA/SH survivors, with whom the Project will sign a memorandum of understanding/collaboration.

⇒ **Processing of complaints at second level**

If the complainant is not satisfied with the first level treatment, the complaint will then be referred to and processed by the grievance resolution committee (GRC). A GRC will be established in each community concerned.

The Grievance Resolution Committee will be responsible for receiving and resolving complaints in a fair, objective, accountable, effectively, timely and accountable manner in all phases of the project lifecycle. It will deal with all grievances that have not been resolved at the local level.

The broad responsibilities of the GRC include:

- Receiving, reviewing, investigating, and keeping track of grievances not resolved at the local level
- Adjudicating grievances as needed
- Monitoring and evaluating the fulfillment of agreements achieved through the grievance mechanism
- Closure of the grievances when they have been successfully resolved or transferred to the judicial system

The GRC will normally include a representative from each of the following agencies:

- (i) The Project Coordinator, PIU or his representative;
- (ii) an NGO working in the sector;
- (iii) Kanifing Municipal Council;
- (iv) A representative of PAPs,
- (v) A representative from the Ministry of Gender, Children and Social Welfare
- (vi) Social development specialist in the PIU
- (vii) GBV specialist within the PIU who will serve as the secretary to the Committee.

This committee will also include two or three women with experience in gender and GBV to serve as EAS/HS entry points. They will receive SEA/HS complaints, conduct investigations in order to establish the link with the project and make referrals to SEA/HS service providers, in accordance with the principles and procedures described in the SEA/HS Prevention and Management Response Plan.

The GRC, which may enlist any person it deems appropriate to assist in the resolution of the dispute.

The PIU will put in place a capacity building program for its stakeholders who will be responsible for ensuring that the complaint handling mechanism operates in accordance with the principles of fairness, transparency, efficiency, confidentiality and documentation of all complaints or feedback requests.

⇒ **Treatment of complaints in the third instance**

If the complainant is not satisfied with the processing in the second level, the third review will be made within a maximum of one week at the level of the Office of the Regional Governor, which is the hierarchical administrative authority.

The Governor may request the support of a third party in the dispute resolution process.

In any case, if the Governor does not move forward with mediation or if the reasons are complex and/or go beyond the scope of the project, the complainant may appeal to the court of first instance.

8.3.3 Legal action

Direct recourse to the courts is possible for a complainant, with or without recourse to amicable settlement and arbitration. If the complainant is not satisfied, he or she can take the matter to the magistrates court. However, this is a last resort and is not recommended for the project as it can lead to uncontrollable costs and delays.

On the other hand, if the complainant wishes to pursue a complaint related to GBV/SEA/HS, he/she can go to court, even as a last resort.

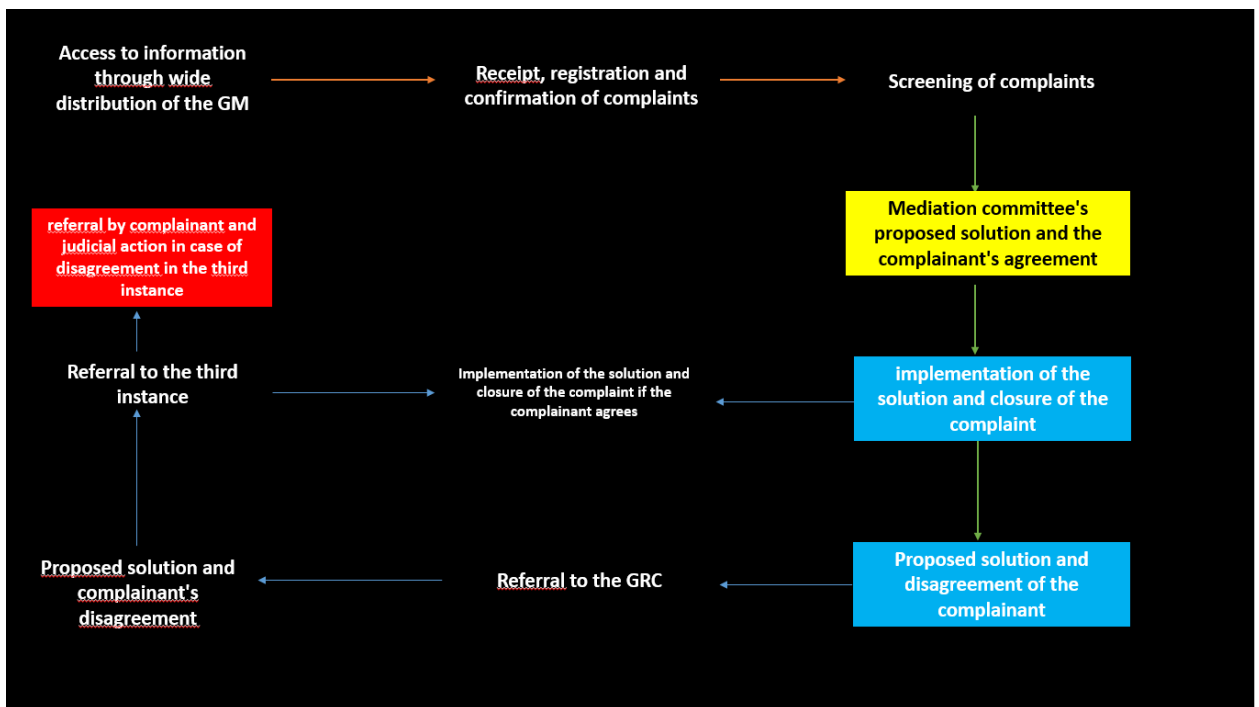
In case of legal recourse, the normal procedure in The Gambia is the following: (i) the complainant fills a complaint form at the magistrate’s court in his/her area; (ii) the magistrate summons the complainant and the person (physical or legal) in question to be heard; (iv) the magistrate appoints, if necessary, a committee to assess the damage; (v) the magistrate renders his or her verdict.

8.3.5 Closing the complaint

The complaint may be recorded as closed in the dedicated log if:

- The complainant has accepted the proposed resolution (if possible in writing, using a dedicated form), and the resolution has been implemented to the satisfaction of the complainant;
- The WACA ResIP II Project PIU in The Gambia, while making every effort to resolve the issue, is unable to reach an agreement with the complainant; in this case, the complainant has the right to take legal action.

Figure 6: Complaint Management Procedure



8.3.6 Complaint processing times

For the system to be operational, it is imperative that the time limits for processing complaints are short and respected. The table below gives the indicative maximum times for processing complaints from the time they are filed to the time they are closed.

Table 16: Maximum time for processing complaints

Steps and action	Time from date of filing, in number of days
Complaint filed	0
Registration	0
Triage of complaints	5
Resolution in Village Mediation Committee	5
GRC	10
Settlement at Governor's level	15
Corrective Action	5
Monitoring of the complaint	20
Closing	30

These deadlines are given for linear processing (i.e. without appeals and referral of the file to a previous stage in the process). If these deadlines are not to be exceeded, it is possible to complete the entire process in a shorter period of time.

Once the choice of treatment has been made, the information should be sent back to the complainant. Furthermore, the complainant should be able to find out the status of the complaint at any time by consulting the committee.

VGB complaints will not be handled informally. They will be transferred to the referral system discussed in the SEA/HS response plan (separate volume). However, they will be followed up by the PIU, especially the Gender and GBV Specialist.

8.3.7 Implementation and monitoring of agreed measures

This will include ensuring that the solution and/or corrective actions are implemented and monitored.

The WACA ResIP II Project PIU in The Gambia will assume all financial costs associated with the required actions.

The WACA ResIP II Project Social Safeguard Specialist in The Gambia will be responsible for ensuring the successful implementation and monitoring of the proposed solution(s) and will report on the progress of the complaint management mechanism.

He/she will ensure that the agreed upon measures are implemented within the above-mentioned timeframe.

8.3.8 Feedback Management

During all the steps aimed at resolving the complaint, the process will be documented in the complaint follow-up sheet. In addition, feedback will be sent by email or physical mail or interactively by phone to all complainants during the entire time their complaints are being processed. In case of a solution, a formal notification will be sent to the complainant. The terms and form of the notification will need to be intellectually and culturally appropriate for the recipient.

The WACA ResIP II PCU in The Gambia will establish a physical and electronic filing system for complaints. The Complaints Administrator will be responsible for archiving complaint records (complaint form, acknowledgement of receipt, investigation reports, complaint settlement agreement, unresolved complaints, etc.).

8.3.9 Complaint tracking

In addition to the complaints database, a physical and electronic archiving system for complaints will be established (complaint form, acknowledgement of receipt, investigation reports, complaint settlement agreement, unresolved complaints, etc.). Monthly statistics on complaints will be produced by the WACA ResIP II Project's social safeguard specialist in The Gambia, taking into account the following indicators:

- the number of complaints received by type/category of reception channel during the month;
- the number of eligible complaints during the month
- the number of complaints pending at the end of the month and comparison with the last month;
- the number and percentage of complaints that resulted in a settlement;
- the number and percentage of resolved complaints;
- the number and percentage of complaints resolved within the timeframe;
- the number and percentage of complaints that were the subject of redress;
- the number of reprisals for whistleblowing;
- the number of complaints that were referred to the courts;
- the rate of GBV/SEA/HS complaints received and not resolved

8.4 Other Complementary Complaint Management Procedures

The above procedure complements the labor management procedures, for which a mechanism for managing complaints from Project workers is presented in the Labor Management Procedures document (separate volume).

As part of the work, each company will establish a GM accessible to all contracted and subcontracted workers to allow them to raise concerns in the workplace, including procedures for the ethical and confidential management of claims of exploitation and sexual abuse/harassment in the workplace. These workers will be informed of the existence of the GM and its procedures upon hire. In addition, measures will be put in place to protect them from retaliation for reporting to the PMM. The GM is designed to respond to concerns in a timely manner, using an understandable and transparent process that provides timely feedback to affected individuals in a language they understand and without compensation, and will operate in an independent and objective manner.

In terms of structure, each company's GM will be designed to allow for the proper management of direct worker complaints and anticipate labor relations risks. This GM will be established as follows:

⇒ Expressing and supporting the formalization of the grievance

The first step in the process is the registration and formalization of the complaint. For this purpose, registers will be opened at the site base and at the premises of the monitoring mission. The WACA ResIP II Project PIU in The Gambia will set up a central complaints register at the Project Management and Coordination Unit.

All complaints received will be recorded at the supervising mission level. They will then be compiled in the information management system maintained by the Environmental and Social Safeguards Specialists of the PIU of the WACA ResIP II Project in The Gambia.

This system, which will be in database format, will include the following elements:

- the reference number, date and signatory (person who registered the complaint)
- the person to whom the complaint is assigned for review and resolution
- the categorization of the complaint.

After the complaint is filed and registered, an acknowledgement of receipt is provided to the complainant as material evidence. From the date of registration in the system, the supervising mission and the PIU of

the WACA ResIP II Project in The Gambia has two (02) days to acknowledge receipt of the complaint via a letter or sms to the complainant.

⇒ Analysis of the complaint

The purpose of the complaint analysis is to verify the validity and seriousness of the complaint.

For this purpose, each complaint will have to be assigned to a designated person within the following entities: the PIU, the supervision mission and the construction company.

If the resolution of the complaint is deemed to be the responsibility of the construction company, for example, a responsible person within the construction company should be clearly designated to analyze the complaint. At this point, the supervision mission will be responsible for monitoring the satisfactory resolution of the problem by the contractor in question, and this within one (01) week.

Ultimately, the work to be undertaken during this phase of analysis of the complaint, which should not exceed one (01) week from the date of receipt by itself, consists of:

- confirm the identity of the complainant by noting the information on the complainant's official identification and, if possible, taking a photograph of the person making the complaint.
- confer with the complainant to gather as much information as possible about the nature of the complaint and determine the appropriate response and approach.
- schedule a site visit, if necessary, to investigate the complaint, but ensure that the complainant and all other parties involved are present.
- document, to the extent possible, all evidence related to the complaint, including taking photographs
- determine whether the complaint is related to an area affected by Project activities. If the complaint is not related to the contractor, inform the complainant that his or her complaint is not accepted and the underlying reasons. The following actions should be taken:
 - Complete the appropriate form and send or submit a copy of the complaint form with reasons for closing the complaint,
 - Provide any documentation or evidence necessary to support this position.
 - Ensure that the complainant is informed of his/her right to present the complaint to a judicial or administrative body and/or to submit it to the local dispute resolution mechanism.

If the complaint can be resolved immediately, discuss the possible solution with the complainant and if the complainant agrees with the resolution, this step will document the solution on the complaint form and determine the date of the next site visit to resolve the complaint.

If the complainant rejects the proposed solution or no immediate solution is possible and further consultation is required, this analysis step will document this on the complaint form and have it signed by the parties.

However, the complainant will need to be provided with additional information regarding his or her rights and the proposed steps to reach a resolution of the complaint, including a time frame.

It should be noted that for each complaint whose analysis is the responsibility of the company, it is up to the supervision mission to report on the progress of its treatment during the weekly site meetings in the presence of the PIU.

A complaints analysis committee is set up to manage the grievances formulated by the workers. This committee will consist of the following entities:

- The PIU of the WACA ResIP II Project in The Gambia,
- The Supervision mission,
- The construction companies.

If it is determined that the claim has merit, the claimant shall receive and benefit from appropriate remedies. The method of appointment of members will be as follows: the various entities will formalize the appointment of their respective experts. The committee will meet, following a site visit and/or interview with the complainant. Following the meeting, a reply will be sent to the complainant, explaining the possibility of having recourse to the committee set up, in the event of dissatisfaction.

If the complainant is not satisfied with the treatment by the committee, the complainant may, if he/she wishes, appeal to the court for arbitration.

When communicating the complaint procedure, the Project will clearly communicate to individuals the different avenues available to them for the handling of their complaints.

Once the investigations are completed, the results will be communicated to the complainant and the complaint will be closed in the database if the complainant accepts the proposed settlement.

If the complainant is not satisfied with the GM's informal resolution process, he or she will be advised to take the matter to the administrative or judicial system.

Chapter 9 Monitoring and Evaluation

8.1 Objective of the Monitoring

Environmental and social monitoring aims at checking the effectiveness and relevance of the implementation of the proposed mitigation measures so that they can be modified, interrupted or replaced if found to be inadequate. Furthermore, the monitoring enables the assessment of compliance with national regulations and Bank procedures on environmental and social assessment. The monitoring and evaluation cover the pre-construction, construction and post construction.

9.1.1 Monitoring

Monitoring will be carried out at three levels as indicated below.

Community level

As part of promoting community participation in the project and to ensure a greater sense of ownership, the community will be involved in the monitoring of the ESMF and the resulting instruments (Subproject ESMPs). For this purpose, they need to be sensitized on simple environmental and social awareness issues such security of work site, conduct environmental sensitization etc. which can be closely monitored at their level.

Internal Monitoring

Internal monitoring will be the responsibility of the Environmental Specialist and Social Specialist within the PIU to ensure compliance with national laws and procedures and the World Bank's Environmental and Social Standards. They will also monitor observance of the WHO and national guidelines with respect to the spread of COVID-19 taking in to any developments in the area. Any monitoring related to SEA/SH and VAC risk and complaints must adhere to international best practices and norms regarding the confidential management of SEA/SH case and survivor data.²⁶ And also about increased understanding about the COVID-19 spreading and mitigation measures. The Supervising Engineer will support the PIU in the day to day monitoring of the contractor's implementation of the C-ESMP and the OHSP.

Supervision by NEA

The NEA and the members of the EIA Working Group will monitor compliance with requirements under Gambian law and the World Bank Standards quarterly. After each monitoring exercise, NEA will submit monitoring reports to MECCNAR (through PIU) its findings of the ESMF implementation. NEA will work with its Regional Environment Officers in KMC and Brikama Area Council to ensure issues reported by the PIU environmental and social specialists are incorporated in the implementation activities and follow-up actions by the various affected institutions and stakeholders are coordinated accordingly.

9.1.2 Environmental and social indicators

Environmental and social monitoring will make it possible to follow the evolution of the state of the environment, particularly the sensitive elements, based on relevant indicators on the environmental components established on a consensual basis by the various stakeholders in its execution. The monitoring indicators as well as certain parameters will have to be re-specified and refined after the completion of the environmental and social studies to be carried out for the sub-projects subject to the project. In order to provide guidance on the environmental and social monitoring of the project, the following frameworks have been developed (see Table 117a & 17b).

Table 17a: Environmental and social monitoring framework for the project

²⁶ WHO Ethical and safety recommendations for researching, documenting and monitoring sexual violence in emergencies (2007); GBVIMS Best Practices <http://www.gbvims.com/wp/wp-content/uploads/BestPractices2.pdf>.

Environmental and social elements	Evaluation elements	Types of indicators and elements to collect	Periodicity
Air	Air quality	<ul style="list-style-type: none"> - Natural presence of fine particles in the air - Incidence of air quality related illnesses 	Semiannual
Soils	Physical properties	<ul style="list-style-type: none"> - Erosion/gravelling - Pollution/degradation - Soil compaction level 	Annual
Fauna/Flora	Evolution of the fauna and flora	<ul style="list-style-type: none"> - Degradation rate - Reforestation rate - Rate of reforested area - Recovery rate - Degree of wildlife disturbance 	Annual
Birds	Evolution of bird species both local and endangered /protected species	<ul style="list-style-type: none"> - Number of local birds sited - Number of endangered species sited - Number of new visitors 	Semiannual
Employment and Labor management	Level of recruitment of employees in Water front areas	<ul style="list-style-type: none"> - Existence of an employment contract for employees - Number of people recruited in the villages - Number of local companies that benefited from the contracts - Number of local laborers by gender used for the work - Percentage of women hired by sub-project 	Semiannual
Occupational Health and safety	Level of compliance with OHS	<ul style="list-style-type: none"> - Number of PPE distributed to workers - Number of traffic accidents - Number of construction site accidents recorded during the work - Number of complaints resolved compared to the number of complaints recorded during the work 	Quarterly
Sexual exploitation and Abuse and Sexual Harassment	Level of compliance with SEA/SH Action Plan	<ul style="list-style-type: none"> - Number of training sessions for staff and workers on code of conduct (CoC) clearly prohibiting SEA/SH and listing sanctions - Percentage of all staff and workers who have signed the CoC - Percentage of SEA/SH complaints that had been referred to GBV service providers for assistance - Number of awareness raising sessions on SEA/SH organized - Number of women consulted in small separate groups led by a woman 	Quarterly

Table 17b: Water quality monitoring framework for the project

Parameter	Surface Water	Periodicity
Physical-chemical Parameters		
Dissolved Oxygen	>6 mg/l	Quarterly
pH	6.5 to 8.5	Quarterly
Turbidity	<5 Nephelometric units	Quarterly
Microbiological Parameters		
Total coliforms	1-10 per 100 ml	Quarterly
Fecal coliforms	0 per 100 ml	Quarterly

9.1.3 Reporting

To better monitor the implementation of the ESMF, the following reporting system is proposed:

- Monthly implementation monitoring reports to be produced by the Supervising Engineer/ Supervision Consultant and transmitted to the GAMWORKS for prior review
- Quarterly implementation monitoring reports produced by the Project's PIU safeguard specialists for transmission to the World Bank and the NEA.

9.2 Mid-Term Review and Final Evaluation

There will be an independent audit every six months and at the end of project implementation. The evaluation indicators will include:

- An assessment of the effectiveness of the mitigation measures put in place to address the negative environmental and social impacts and risks;
- the nature and extent of stakeholder engagement;
- an assessment of the effectiveness of the grievance process, including grievance resolution, corrective actions taken, and the monitoring thereof;
- any outstanding adverse impacts identified that need to be resolved before closing the project.

CHAPTER 10: IMPLEMENTATION SCHEDULE AND THE BUDGET

Table 18: Implementation schedule for the ESMF

ACTIVITIES	Year 1				Year 2				Year 3				Year 4				Year 5			
	Q1	Q 2	Q 3	Q 4	Q 1	Q 2	Q 3	Q 4	Q 1	Q 2	Q 3	Q 4	Q 1	Q 2	Q 3	Q 4	Q 1	Q 2	Q 3	Q 4
Institutional level																				
1. Recruitment of E & S Specialists																				
2. Preparation and signature of MOU with NEA																				
Technical																				
1. ESMF National Outreach Workshop																				
2. Screening of sub-projects																				
Preparation of ESIA/ESMP																				
3. Monitoring of ESMP implementation by Environmental and Social Specialists																				
4. Semi-annual supervision by NEA																				
5. ES Implementation Evaluation	Mid-term																			
	Final																			
Training/sensitization																				
Implementation of GM																				
1. Installation and training of grievance resolution committees																				
2. Organization of awareness campaigns																				
3. Support for the operation of local management committees																				
Land Acquisition																				
1. Land acquisition for project activities																				

2. Compensation for Economic and physical displacement																			
3. Land preparation and resettlement																			

BUDGET FOR THE IMPLEMENTATION OF THE ESMF

The estimated cost for the implementation of the ESMF including the capacity building is 277,000.00USD (Two Hundred and Seventy Seven Thousand USD) as detailed in the table below.

Table19: Estimated costs of the implementation of the ESMF Procedures

Activities	Quantity	Unit cost	Total cost US\$
Institutional measures			
1. Recruitment of Specialists in Environmental and Social Safeguards, Gender and GBV, Stakeholder Consultation and Communication Consultant, and OHS specialist	5	-	Included in PIU cost
2. Monitoring of the implementation of the project's environmental and social instruments by NEA (provision of logistics support based on the signed Memorandum of Understanding)	5	3,000	15,000
E&S measures			
3. ES National Outreach Workshop	01	01	5 000
4. Screening of sub-projects	PIU	PIU	PIU
5. Preparation of the ESIA/ESMPs for specific sites	2	75,000	150,000
6. Preparation and implementation of C-ESMP after validation by PIU AND Supervising Engineer	Contractor	Contractor	Contractor
7. Ongoing monitoring of ESMP implementation by Environmental and Social Safeguards Specialists	PIU	PIU	PIU
8. Evaluation (mid-term and final) of the implementation of the ESMF	02	20,000	40,000
Training/Awareness			
9. Module on SEA/SH/VAC risk for PIU staff, project workers and beneficiary communities -Occupational Health and Safety Module-Contracted and supply workers	02	5 000	10, 000
10. Training on the World Bank's environmental and social standards –for PIU staff and contractors and implementing partner agencies (e.g. contractors to understand the C-ESMP and its implementation)	03	5 000	15, 000
11. Capacity building for all stakeholders on GM, SEA/HS, basic environmental actions to improve their surrounding, skills training etc.	05	5,000	25,000
Implementation of the GM Action Plan			
12. training of Grievance Resolution Committees	1	5000	5000
13. Organization of awareness raising campaigns and popularization of the GM to stakeholders in the communes of intervention	3	2500	7000
14. Support for the operation of local management committees	2	2500	5000
TOTAL			277,000.00

CONCLUSION

The implementation of the WACA ResIP2 will have many positive benefits for an area that has suffered persistently from floods, poor waste management, communication/connectivity difficulties and poverty. The residents have high expectations that the project will address these environmental, social and climate change challenges. However, the potential adverse environmental and social risks and impacts of the project will need to be carefully assessed to ensure that appropriate mitigating measures are put in place to address them. Since the design and the specific sites for the civil works are not known, the present ESMF has been prepared to guide the screening and preparing ESIA's including ESMPs for specific intervention sites.

ANNEX

Annex 1: Bibliography

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Annex 2: Terms of Reference for the Preparation of Environment and Social Management Framework

1. PROJECT BACKGROUND

The Government of The Gambia through the Ministry of Environment, Climate Change and Natural Resources (MECCNAR) is seeking financial support from the World Bank to develop and implement the West Africa Coastal Areas Resilience Investment Project 2. The Project Development Objective (PDO) is to strengthen the resilience of targeted communities and areas in coastal Western Africa. To achieve this objective, the project will consist of four (4) components: (1) Strengthening Regional Integration; (2) Strengthening the Policy and Institutional Framework; (3) Strengthening National Physical and Social Investments; and (4) Project Management.

The proposed project will support the Government to improve the institutional and policy frameworks around disaster risk management, integrated coastal development, natural resource management, and urban resilience. It will also improve flood and coastal risk management in selected risk prone areas in Greater Banjul Area, investing in climate resilient infrastructure and promoting nature based solutions, involvement and interventions at the community level. Furthermore, it will contribute to public service delivery improvement as it will improve flood management and mitigate the negative effects flooding events have on basic public service delivery.

It is expected that the project will: (a) strengthen the resilience to flood risks; (b) improve the attractiveness and accessibility of the riverfront: recreational purposes, biodiversity; (c) enhance socio-economic development of area; (d) improve liveability and urban environment; (e) reduce pollution from uncontrolled storm water runoff; (f) improve public health conditions; and (g) improve accessibility/connectivity avoiding traffic disruption.

The proposed Project has four components as follows:

Component 1: Regional integration. The objective of the regional integration component is to strengthen the effective coordination of interventions for coastal resilience in West Africa at the regional and national levels. This is achieved through the consolidation of the regional institutional set-up and harmonization of policy, to seek economies of scale and the development of new strategic partnerships needed for the scale-up of response to the coastal resilience development challenge.

Component 2: Strengthening the policy or institutional frameworks. The project will support the strengthening of institutional and policy frameworks around coastal development, protection, and natural resource management. Focus areas will include strengthening of existing national coordination mechanisms and of institutional capacity for coastal development and protection.

Component 3: Physical and social investments. This sub-component will finance site-specific interventions for coastal protection and/or flood control to reduce risks of flooding and/or erosion in the Greater Banjul Area (GBA), home to 25 percent of the country population and 45 percent of GDP. The project is expected to finance a mix of gray, green, and hybrid infrastructure solutions at along the selected prioritized Kotu Stream hotspot to reduce risks of flooding and erosion. Green or nature-based solutions include but not limited to retention ponds/tanks/wetlands/parks, water squares/sunken plazas, (bio)swales, tree tranches, sidewalk planters, green roofs, soak ways, water harvesting, green infrastructure/planting, urban gardens, submerged native aquatic vegetation, and mangrove protection to serve as a buffer to inundation and sea-level rise. Potential grey solutions include small-scale localized infrastructure such as constructing primary and secondary drainage systems and widening the Kotu Stream banks for mitigating erosion and urban flood risk and building bridges to serve as crossing point along the project site for enhancing community access, while hybrid solutions incorporate both approaches depending on site-specific needs and characteristics. Feasibility and design studies for the intervention will also be supported by this component.

The project will also support interventions for social development and economic recovery based on the needs of affected urban and coastal communities. The project will support participatory activities (social subprojects) to work with communities on nature protection and conservation and alternative livelihoods.

Component 4: Project management. The component will finance project management costs of the CPCU for staffing, monitoring and evaluation, project technical audits, safeguards, financial management, procurement and training.

2. ENVIRONMENTAL AND SOCIAL RISKS AND REQUIREMENTS

The project will be prepared and implemented under the Environmental and Social Management Framework (ESF) of the World Bank. The project risk rating is high for both environment and social. There are ten Environment and Social Standards (ESS) under the ESF of which the following standards are considered relevant to this project:

- ESS1: Assessment and Management of Environmental and Social Risks and Impacts
- ESS2: Labor and Working Conditions
- ESS3: Resource Efficiency and Pollution Prevention and Management
- ESS4: Community Health and Safety
- ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement
- ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- ESS8: Cultural Heritage
- ESS10: Stakeholder Engagement and Information Disclosure

The proposed environmental risk classification is High. The project is expected to have positive environmental impacts by restoring coastal ecosystems, especially mangroves, to reduce the risk of erosion and flooding, including removal of trash from water ways and building natural water storage system. However, the project scope and nature, and environmental sensitivity, especially component 3, will finance several activities, including the construction of physical infrastructure. These interventions will take place in a highly fragile urban and coastal area, with the potential of urban and coastal flooding and erosion and the fact that poorly designed and/or implemented interventions could exacerbate erosion and flooding downstream. Furthermore, health and safety of the workers and the community would need to be considered and properly managed. Potential OHS risks and hazards that can be associated with the construction of physical infrastructure include: (i) exposure to dusts, fumes, and gases from potentially harmful chemicals which can cause significant breathing

problems and lung diseases, (ii) stress and fatigue due to frequent or excessive manual handling of loads, and (iv) physical injury. In addition, the project will be operating in highly sensitive areas (i.e. a stream with some mangroves) providing important ecosystem services. Poorly designed and/or implemented interventions in these areas could potentially exacerbate erosion and flood risks downstream.

The proposed social risk classification is High. Key social risks associated with project activities include possible physical and economic displacement from the project activities in the short-term and losses of assets and/or income due to impacts from project activities; potential inter-communal conflict; potential barricading of informal footpaths used by women and other commuters to access the nearest markets, potential labor influx that in turn may exacerbate the risks related to SEA/SH; social exclusion of vulnerable groups such as persons with disabilities, the landless, elders and youth in the consultations process and access to benefits and development opportunities. Other risks include potential for child labor; community health and safety concerns; social fragmentation and disruption of traditional livelihoods. In terms of client capacity, there is variation in institutional capacity and readiness at the national levels (including in the preparation and implementation of ESF instruments). The physical interventions in component 3 may require some physical and/or economic resettlement or may cause access restriction to resources in case of national parks or legally protected areas. This in turn may create local conflicts between the project beneficiaries related to benefit sharing, and the ability to eventually move to areas downstream that may still be at risk of flooding. Furthermore, contractor workforce can heighten risks of Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH) and facilitate the spread of communicable diseases to and from local communities (including COVID-19 and sexually transmitted diseases). The issues of labor conditions, SEA/SH, and universal access will need to be properly managed.

3. OVERALL OBJECTIVE AND SCOPE OF WORK

The objective of this assignment is to support the CPCU-MECCNAR in the preparation of the requisite E&S instruments for ResIP 2 in The Gambia. The Consultancy Firm will need to prepare the documents listed below in accordance with the relevant laws and policies of the Government of The Gambia and the ESF of the World Bank and taking into consideration the World Bank's requirements under the ESSs relevant to the project, the World Bank Group's Environmental Health and Safety Guidelines, and the World Bank Good Practice Notes.

- i. Environmental and Social Management Framework (ESMF)
- ii. Resettlement Policy Framework (RPF)
- iii. Stakeholder Engagement Plan (SEP) including Grievance Redress Mechanism (GRM)
- iv. Labor Management Procedure (LMP)
- v. Environmental and Social Commitment Plan (ESCP)

The ESMF and RPF will provide guidelines for screening all project activities and provide for further assessment and preparation of full ESIA or RAP respectively. The two frameworks; ESMF and RPF will also guide the determination, preparation and implementation of the appropriate site specific instruments mentioned above to address specific impacts that may arise during project execution in all five hotspots. These instruments are required to be prepared in accordance with Gambian laws and the World Bank's Environment and Social Framework.

The Consultancy Firm shall ensure that all beneficial and adverse impacts associated with project activities, including all associated/ancillary works and linked activities if any, are assessed and taken into account, and that the appropriate mitigation measures are in place.

The assignment will involve literature reviews, field visits and data collection exercises, consultations with various institutions and stakeholders on the preparation of reports, drawing on any World Bank ESF templates, and developing draft reports for review by the CPCU-MECCNAR and the World Bank.

The consultancy is considered complete only upon approval and clearance of the final versions of the above documents by the CPCU-MECCNAR, National Environmental Agency (NEA) and the World Bank.

4. DETAILED TASKS

To achieve the assignment objective, the main expected tasks to be completed are as follows:

Task 1: Preparation of Inception Report including Work Plan

The Consultancy Firm will prepare, in coordination with the assigned staff at the CPCU-MECCNAR, an inception report including a work plan for the preparation of the required E&S documents. Deliverables and related timing specified in the work plan will be agreed with the CPCU-MECCNAR and the World Bank.

Task 2: Preparation of Environmental and Social Management Framework (ESMF)

The ESMF sets out the principles, rules, guidelines, and procedures to assess the E&S risks and impacts of the project. It will comprise measures and plans to reduce, mitigate, and/or offset adverse risks and impacts, provisions for estimating and budgeting the costs of such measures, and information on the agencies responsible for addressing project risks and impacts, including on their capacity to manage E&S risks and impacts. It will include adequate information on the area in which subprojects are expected to be sited, including any potential E&S vulnerabilities of the area; and on the potential impacts that may occur and mitigation measures.

The ESMF should include, but not be limited to, the following:

- i. Description of the proposed project (from the project documents, with any additional descriptions of components which may have direct, indirect and/or cumulative E&S impacts);
- ii. Assessment of the potential E&S risks and impacts of the project against the 8 ESSs relevant for the project, and recommend appropriate mitigation measures, benefit enhancement measures and minimum standards / criteria;
- iii. Review of the existing instruments and relevant national laws and regulations, and identification of gaps against applicable ESSs, and measures to fill the identified gaps;
- iv. Provide guidelines for subprojects screening process including eligibility for funding under the project, compliance with the ESF and local laws, risk classification, E&S tool(s) to be prepared including ToRs, and stakeholder consultation and disclosure requirements;
- v. Chance Finds Procedures: Include a chance finds procedure that will be followed if previously unknown cultural heritage is encountered during project activities. The chance finds procedure should set out how chance finds associated with the project will be managed. The procedure should include a requirement to notify relevant authorities of found objects or sites by cultural heritage experts; to fence-off the area of finds or sites to avoid further disturbance; to conduct an assessment of found objects or sites by cultural heritage experts; to identify and implement actions consistent with the requirements of ESS8 and national law; and to train project personnel and project workers on chance find procedures.
- vi. Institutional arrangements for E&S management during implementation, including the mechanisms and responsibilities for E&S screening, the preparation of E&S tools, and monitoring, evaluation and reporting systems;
- vii. Identification of capacity gaps of the Central Project Coordination Unit (CPCU) or the project implementing unit (PIU) and key stakeholders and a capacity building plan (with budget) during the project implementation;
- viii. Description of the project Grievance Redress Mechanism (GRM) and worker GRM;

- ix. Training Need: Assess institutional capacity of implementing agencies on ESMF implementation and identify needs for capacity building. The section should also describe how sensitization meetings and launching workshops can bring out environmental and social issues and considerations of the proposed economic and social infrastructure sub-projects.
- x. Public Consultation and Disclosure: Public consultation is a vital part of this Environmental and Social Assessment process. Since the ESMF is developed before most of the sub-project decisions are made. Propose consultation and disclosure processes undertaken during project design and ESMF development.
- xi. Summary of stakeholder consultations on the ESMF; and
- xii. Annexes including negative and positive lists for eligibility, screening checklists and form, outline for ESMP, E&S Codes of Practice for Construction Works, and relevant baseline or contextual E&S data.

Specific tasks of the Consultancy Firm:

1: General information about the project

An analysis of the documentation available concerning the project, its components, and its implementation schedule. The various activities planned under the project will be presented and the Consultancy Firm will identify activities that are likely to have positive and / or negative environmental and social impacts, with regard to environmental and social sensitivities and issues.

2: Biophysical and socio-economic characteristics of the environment

The study will present and analyze the basic environmental and social data of the project's areas of influence and will summarize the recent documents available to present a brief description and analysis of the main environmental problems encountered as well as the causes of these problems, and the responses to these causes. To this end, an overview of the ecological and social context in which the project will operate will be given, in short an exhaustive inventory of the interrelationships of ecological and social processes.

The study will characterize the ecological, socio-economic profile of the areas potentially affected by the project. The study will include a section on a collection and range of basic data on the biophysical and socio-economic characteristics of the areas covered by the project. On the biophysical environment, particularly in the areas targeted by the project, it will collect and synthesize information on the climate, surface and underground water resources, geology, topography, soils and the erosion process.

A section will take stock of flora, fauna, sensitive habitats (national parks, classified forests, reserves with protected, rare, endemic or endangered species), wetlands, significant natural sites, surface water.

It will pay particular attention to the environmental sensitivities and values of the environment.

The study will also present the human environment in the project area (demography, health, primary, secondary and tertiary activities with particular emphasis on the interrelationships with the environment and the sectors concerned by the project but also land issues, land use, historical and archaeological sites, etc.).

3: Analysis of the political, legal, regulatory and administrative framework

The study will present a summary of the national environmental protection policy in general and sectoral in the areas concerned by the project. It will also characterize the main legislative, regulatory and administrative texts of the Gambia relating to the management of the environment and natural resources and to the procedures of environmental and social impact studies, but also to land, to expropriation procedures, resettlement and restitution

(compensation), labor management, stakeholders engagement, grievance management, community health and safety and will analyze them in relation to the World Bank ESF. The national and international regulatory and legal frameworks retained for the environmental and social management of the project will be summarized. The Environmental and Social Standards of the World Bank which are relevant for the project will be analyzed and the approach adopted for the conformity of the project activities with these standards will be developed.

4: Identification and assessment of major and minor positive and negative impacts of the project

The major positive and negative impacts related to the implementation of the project will be assessed in line with the eight (8) ESSs relevant to the project. A particular emphasis will be made on the identification and evaluation of the positive and negative changes caused by the project in relation to the basic situations (physical, biological, human, socio-cultural environment, economic activities, job opportunities, etc.). Any cumulative impact will be highlighted by considering existing infrastructure and project activities. During the construction / rehabilitation phase as well as during operation, particular attention will be paid to the following environmental and social impacts: loss of natural habitat and vegetation, disruption of drainage and crop systems, effects of river crossings, water, damage to cultural and archaeological sites, displacement and loss of land, noise, social disruption, risks linked to HIV / AIDS, GBV etc.

5: Checklists of Mitigation and Bonus Measures

They will include a description of each mitigation measure, by type of activity, indicating in particular the type of nuisance to which it remedies and the conditions under which it is necessary; a description of each bonus measure capable of reinforcing the positive impacts of project activities.

6: Consultation process

For the preparation of the ESMF purpose, series of consultations will be organized with all stakeholders, as part of a broad participatory approach. All the stakeholders should be identified, consulted and trained in a participative approach during the preparation of the ESMF: concerned ministries, local authorities, local organizations and associations, NGOs and all other services, communities, vulnerable people. Recommendations will be made, if necessary, of appropriate measures to strengthen the consultation processes during project implementation.

7: Definition of Environmental and Social Management procedures and responsibilities

The ESMF will define procedures and responsibilities for managing environmental and social risks and impacts to ensure that the project complies with The Gambian policies and regulations and the World Bank's ESF. These procedures will define the technical and institutional measures, feasible and economic, and likely to reduce the potentially very harmful effects on the environment to acceptable levels and to strengthen the positive impacts of the project in order to increase its environmental performance. The preparation of such a process will include at least the following subtasks: (i) Methodology for environmental and social screening and selection of project activities; (ii) Institutional capacity building plan; (iii) Environmental and social monitoring program / plan.

Annex 3: Sub-Project Environmental and Social Screening Form and Guidelines

Date: _____

Location: _____

Region/community: _____

Name: _____

Job title: _____

Telephone numbers: _____

E-mail address: _____

Signature: _____

Section B

Project activity (for each project site select one project activity at a time and evaluate its impacts, mitigation, and adaptation measures by using the checklist in Section C).

SECTION C: Check List

This ESMF analyses the potential adverse impacts of implementing the project by looking at the probability, scale, significance and scope, magnitude, duration, reversibility, and availability of effective mitigation measures. It employs a rating scale of 1-3 with a scale of 3 denoting high impact, 2 denoting Medium/low significance impact and 1 denoting null/insignificant impact

ADVERSE IMPACTS	1	2	3	REMARKS & MITIGATIONS MEASURES
Project Siting				
Will the activity compete for the following use to which you put the land?				
Trees				
Water				
Forest in your surrounding				
Potential Environmental Impacts				
Will the activity increase the following waste in the country?				
Paper waste				
Plastic waste				
Liquid waste				

ADVERSE IMPACTS	1	2	3	REMARKS & MITIGATIONS MEASURES
Will the activity increase the need for security and safety during implementation?				
Will the activity affect drainage in the surrounding?				

ADVERSE IMPACTS	1	2	3	REMARKS & MITIGATIONS MEASURES
Project Siting				
Does the Activity take place in a densely populated area?				
With heavy development activities?				
Adjacent to or within any environmentally sensitive areas, such as cultural heritage site, protected area, wetland, mangrove, estuarine, bay?				
Potential Environmental Impacts				
Are there any environmentally sensitive areas that could be adversely affected by the activity?				
Are there any threatened species that could be adversely affected by the Activity				
Are there potentials of introducing alien species due to the activity?				
Are there land use changes that are likely to affect ecosystems and services due to the activity?				
Will the activity affect ground water recharge due to excessive extraction of water for irrigation?				
Is there a need to cut down any trees?				
Will the activity affect the aesthetic attractiveness of the local landscape?				

ADVERSE IMPACTS	1	2	3	REMARKS & MITIGATIONS MEASURES
Will the project generate temporary or permanent traffic disturbances, interfere with or block access, routes etc. (for people, livestock, and wildlife) or traffic routing and flows, due to construction material transport and wastes?				
Land Acquisition and/or Resettlement				
Will involuntary resettlement, land acquisition, relocation of property, or loss, denial, or restriction of access to land and other economic resources (i.e., crop fields and rivers) be caused by the activity?				
Would the activity lead to dislocation or involuntary resettlement of people?				
Noise and Air Emissions				
Will this activity increase GHG emissions in the energy sector?				
Will this activity increase GHG emissions in the Industrial Processes and Product Use Sector (IPPU)?				
Will this activity increase GHG emissions in the Industrial Processes and Product Use Sector (IPPU)?				
Will this activity increase GHG emissions in the Agriculture, Forestry and Other Land use sector?				
Will this activity increase GHG emissions in the Waste sector?				
Will the operating noise level from the equipment use in this activity exceed the allowable decibel level or noise limits?				
Will the activity cause smell, and an influx of insects, rodents, etc.?				
Solid or Liquid Wastes Generation				
Will the activity generate solid, liquid, or hazardous wastes? (Including shipping and package waste, domestic and sanitation waste, asbestos, PCB etc.)				

ADVERSE IMPACTS	1	2	3	REMARKS & MITIGATIONS MEASURES
Will the activity cause impairment of downstream water quality, risk causing contamination of drinking water, inadequate wastewater treatment or release of untreated wastewater/sewage?				
Will the activity generate chemical contamination of soil and ground water?				
Occupational health hazards				
Will this require a large number of staff and workers; large/long-term construction camp?				
Do you have an estimate of how many workers will be employed in this activity?				
Do you have hired workers from the local community?				
Would this activity create social conflicts between construction workers from other areas and community workers?				
Do you agree, monitor, and comply with the labor recruitment policy and apply the core labor standards (i.e., freedom of association, prohibition of child labor, prohibition of discrimination, and prohibition of forced labor; equal pay, safe working conditions, social security)?				
Are the infrastructure of this activity prone to hazards, risks and could they result in accidents and injuries to workers (i.e., inhaling asbestos-containing materials or getting in contact with them).?				
Will the infrastructure of this activity require frequent maintenance and/or repair?				
Gender questions				
Do you have a policy related to supporting the rights of women and ensuring women's participation in this activity?				

ADVERSE IMPACTS	1	2	3	REMARKS & MITIGATIONS MEASURES
Approximately how many percent of your staff in The Gambia are female? Please provide male-female disaggregated data by occupation (i.e., administrative, and technical positions).				
Are there any specific benefits provided to women? (e.g., maternity/childbearing insurance, day shift arrangements for mothers)				
Is there any opportunity to promote opportunities or empowerment of women in this activity?				
Do women have special needs, concerns, and experience in this type of activity?				
Do men have special needs, concerns, and experience in this type of activity?				

Public Consultation and Disclosure

Has public consultation and participation been sought?

Yes _____ No _____

For Official Use Only	
Reviewed by:	Date:
Classified High Substantial Moderate Low	
Reasons for the Classification:	
Endorsed by:	Date:
Approved by Executive Director:	Date:

Annex 4. TOR Template for Assessing the Environmental and Social Impacts of Specific Sub-Projects (Guidance for the Team Preparing the ESIA)

INTRODUCTION

This first section of the TOR indicates the purpose of the TOR, identifies the subproject sponsor, briefly describes the subproject to be evaluated, and presents the arrangements made at this stage to conduct the Environmental and Social Impact Assessment (ESIA), such as a request for proposals.

BACKGROUND

This section explains the institutional, geographical, environmental, social, and economic context of the subproject. In addition, it provides relevant information on the objectives and components of the sub-project, as well as the study area, so that anyone interested in the project can fully understand the situation and constraints surrounding the sub-project and the ESIA to be conducted.

This section should also refer to any sources of information that may be useful in conducting the ESIA. In addition, this ESMF and the component in which the project falls may serve as a useful source of information in the preparation of the sub-project ESIA.

REQUIREMENTS

This section outlines the standards and guidelines that should be followed in conducting the ESIA. Among others, these may include:

- The regulatory texts of the Gambia include the international environmental and social conventions ratified by The Gambia
- The World Bank's Environmental and Social Standards
- World Bank environmental and social guidelines (Environmental Assessment Sourcebook and Updates, Pollution Prevention and Abatement Handbook, documents related to social aspects such as involuntary resettlement, cultural heritage, etc.)
- ESF Borrower's notes
- Other relevant documents.

OBJECTIVES AND SCOPE OF THE STUDY

This section defines the objectives of the ESIA and summarizes the scope of work, identifying the major tasks to be completed during the study. The scope and level of effort required to prepare the ESIA should be commensurate with the potential impacts of the project. For example, an ESIA for a subcomponent that would have major adverse impacts on social components but little impact on the environment should focus primarily on the affected social components.

Key tasks that should appear in this section of the TOR because of their importance to the preparation of an ESIA include

- Describe the proposed sub-project by providing a summary description of the relevant project components and presenting plans, maps, figures, and tables.
- Identify the political, legal, and administrative framework in which the sub-project is situated.
- Define and justify the subproject study area for the environmental and social impact assessment.
- Describe and analyze the conditions of the physical, biological, and human environments in the study area prior to project implementation. This analysis should include the interrelationships between environmental and social components and the importance that

society and local people attach to these components, in order to identify environmental and social components of high value or special interest.

- Present and analyze alternatives to the proposed project, including the "no project" option, identifying, and comparing alternatives on the basis of technical, economic, environmental, and social criteria.
- For the selected alternative, identify and evaluate the significance of potential negative and positive, direct, and indirect, short- and long-term, temporary, and permanent environmental and social impacts based on a rigorous methodology.
- Define appropriate mitigation and enhancement measures to prevent, minimize, mitigate, or compensate for adverse impacts or to increase the environmental and social benefits of the project, including associated liabilities and costs.
- Develop an environmental and social monitoring program, including indicators, institutional responsibilities, and associated costs.
- Prepare an Environmental and Social Management Plan, including an accident risk analysis, identification of appropriate safety measures and development of a preliminary health and safety plan.
- Prepare Resettlement Action Plan, and/or Process Framework if necessary.
- Identify institutional responsibilities and capacity building needs, if any, to implement the recommendations of the environmental and social assessment.
- Conduct consultations with primary and secondary stakeholders to obtain their views and concerns about the project. These consultations should be held during the preparation of the ESIA report to identify key environmental and social issues and impacts, as well as after the preparation of the draft ESIA report to gather stakeholder feedback on proposed mitigation and enhancement measures.
- Prepare the ESIA report according to the typical content presented in this ESMF.
- Prepare an Environmental and Social Management Plan (ESMP) in accordance with the typical content presented in this ESMF.

SCHEDULE

This section specifies timelines for delivery of the preliminary (draft) ESIA and final reports, as well as any other important events and dates. The timeline must be realistic to allow for the preparation of the ESIA report within the specified timeframe.

TEAM OF EXPERTS AND LEVEL OF EFFORT

This section identifies the types of experts required to conduct the ESIA and indicates, if possible, the estimated level of effort for each expert. A multi-disciplinary team that includes experts in both environmental and social fields should be favored. Expertise requirements should be defined as precisely as possible to ensure that key issues related to the project assessment are addressed by the appropriate specialists, such as a gender specialist when gender issues are critical, or a hydrologist when water management is crucial to the success of the project.

Annex 5: Indicative Outline of an Environmental and Social Management Plan (ESMP)

An ESMP consists of the set of mitigation, monitoring, and institutional measures to be taken during implementation and operation of a project to eliminate adverse environmental and social risks and impacts, offset them, or reduce them to acceptable levels. The ESMP also includes the measures and actions needed to implement these measures. The Borrower will:

- i. identify the set of responses to potentially adverse impacts;
- ii. determine requirements for ensuring that those responses are made effectively and in a timely manner; and
- iii. describe the means for meeting those requirements.

Depending on the project, an ESMP may be prepared as a stand-alone document²⁷ or the content may be incorporated directly into the ESCP. The content of the ESMP will include the following:

(a) *Mitigation*

- The ESMP identifies measures and actions in accordance with the mitigation hierarchy that reduce potentially adverse environmental and social impacts to acceptable levels.
- The plan will include compensatory measures, if applicable. Specifically, the ESMP:
 - i. identifies and summarizes all anticipated adverse environmental and social impacts (including those involving Indigenous Peoples, involuntary resettlement, labor and working conditions, SEA/SH, stakeholder engagement and grievance resolution, etc.)
 - ii. describes—with technical details—each mitigation measure, including the type of impact to which it relates and the conditions under which it is required (e.g., continuously or in the event of contingencies), together with designs, equipment descriptions, and operating procedures, as appropriate
 - iii. estimates any potential environmental and social impacts of these measures; and
 - iv. considers, and is consistent with, other mitigation plans required for the project (e.g., for involuntary resettlement, indigenous peoples, or cultural heritage).

(b) *Monitoring*

- The ESMP identifies monitoring objectives and specifies the type of monitoring, with linkages to the impacts assessed in the environmental and social assessment and the mitigation measures described in the ESMP.²⁸
- Specifically, the monitoring section of the ESMP provides (a) a specific description, and technical details, of monitoring measures, including the parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective

²⁷ This may be particularly relevant where the Borrower is engaging contractors, and the ESMP sets out the requirements to be followed by contractors. In this case, the ESMP should be incorporated as part of the contract between the Borrower and the contractor, together with appropriate monitoring and enforcement provisions.

²⁸ Monitoring during project implementation provides information about key environmental and social aspects of the project, particularly the environmental and social impacts of the project and the effectiveness of mitigation measures. Such information enables the Borrower and the Bank to evaluate the success of mitigation as part of project supervision and allows corrective action to be taken when needed.

actions; and (b) monitoring and reporting procedures to: (i) ensure early detection of conditions that necessitate particular mitigation measures, and (ii) furnish information on the progress and results of mitigation.

(c) Capacity Development and Training

- To support timely and effective implementation of environmental and social project components and mitigation measures, the ESMP draws on the environmental and social assessment of the existence, role, and capability of responsible parties on site or at the agency and ministry level.
- Specifically, the ESMP provides a specific description of institutional arrangements, identifying which party is responsible for carrying out the mitigation and monitoring measures (e.g., for operation, supervision, enforcement, monitoring of implementation, remedial action, financing, reporting, and staff training).
- To strengthen environmental and social management capability in the agencies responsible for implementation, the ESMP recommends the establishment or expansion of the parties responsible, the training of staff and any additional measures that may be necessary to support implementation of mitigation measures and any other recommendations of the environmental and social assessment.

(d) Implementation Schedule and Cost Estimates

- For all three aspects (mitigation, monitoring, and capacity development), the ESMP provides (a) an implementation schedule for measures that must be carried out as part of the project, showing phasing and coordination with overall project implementation plans; and (b) the capital and recurrent cost estimates and sources of funds for implementing the ESMP. These figures are also integrated into the total project cost tables.

(e) Integration of ESMP with Project

- The Borrower's decision to proceed with a project, and the Bank's decision to support it, are predicated in part on the expectation that the ESMP (either stand alone or as incorporated into the ESCP) will be executed effectively. Consequently, each of the measures and actions to be implemented will be clearly specified, including the individual mitigation and monitoring measures and actions and the institutional responsibilities relating to each, and the costs of so doing will be integrated into the project's overall planning, design, budget, and implementation.

Annex 6: Environmental and Social Guidelines for Civil Works Contractors

The contractors are required to use environmentally acceptable technical standards and procedures during the implementation of construction of works. All construction contracts will contain the following requirements:

- Take precautions against negative influence on environment, any environmental damage or loss through prevention or suppression measures (where it is possible) instead of liquidation or mitigation of negative consequences.
- Observe all national and local laws and rules on environmental protection. Identify officers responsible for the implementation of activities on environmental protection conforming to instructions and directions received from the construction and design or environmental protection agencies.
- Store and dispose of construction waste consistent with national regulations and the sub-project (site-specific) EMP
- Minimize dust emission to avoid or minimize negative consequences influencing air quality.
- Provide pedestrian crossing and roads and access to the public places.
- Provide markets with light and transient roundabout connections to assure safety and convenience.
- Prevent or minimize vibration and noise from vehicles during explosive activities.
- Minimize damages and assure vegetation recovery.
- Protect surface and underground water from soil pollution. Assure water collection and distribution.

Safeguards Procedures for Inclusion in the Technical Specifications of Contracts (for rehabilitation/repairs activities)

I. General

1. The Contractor and his employees shall adhere to the mitigation measures set down and take all other measures required by the Engineer to prevent harm, and to minimize the impact of his operations on the environment.
2. Remedial actions which cannot be effectively carried out during construction should be carried out on completion of each subproject and before issuance of the "Taking over certificate":
 - (i) these subproject locations should be landscaped and any necessary remedial works should be undertaken without delay, including grassing and reforestation;
 - (ii) water courses should be cleared of debris and drains and culverts checked for clear flow paths; and
 - (iii) borrow pits should be dressed as fish ponds, or drained and made safe, as agreed with the land owner.
3. The Contractor shall limit construction works to between 6 am and 7 pm if it is to be carried out in or near residential areas.
4. The Contractor shall avoid the use of heavy or noisy equipment in specified areas at night, or in sensitive areas such as near a hospital.
5. To prevent dust pollution during dry periods, the Contractor shall carry out regular watering of earth and gravel haul roads and shall cover material haulage trucks with tarpaulins to prevent spillage.

6. To avoid disease caused by inadequate provision of water and sanitation services, environmentally appropriate site selection led by application of the environmental and social screening form provided in this ESSAF, design and construction guidance, and a procedure for ensuring that this guidance is followed before construction is approved. Ensure engineering designs include adequate sanitary latrines and access to safe water.
7. To prevent unsustainable use of timber and wood-firing of bricks, the contractor should replace timber beams with concrete where structurally possible. In addition, the contractor should ensure fired bricks are not wood-fired. Where technically and economically feasible, substitute fired bricks with alternatives, such as sun-dried mud bricks, compressed earth bricks, or rammed earth construction.
8. The Contractor shall conduct appropriate disposal of waste materials and the protection of the workforce in the event of asbestos removal or that of other toxic materials.

Prohibitions

9. The following activities are prohibited on or near the project site:
 - Cutting of trees for any reason outside the approved construction area;
 - Hunting, fishing, wildlife capture, or plant collection;
 - Use of unapproved toxic materials, including lead-based paints, asbestos, etc.
 - Disturbance to anything with architectural or historical value;
 - Building of fires;
 - Use of firearms (except authorized security guards);

II. Transport

10. The Contractor shall use selected routes to the project site, as agreed with the Engineer, and appropriately sized vehicles suitable to the class of road, and shall restrict loads to prevent damage to roads and bridges used for transportation purposes. The Contractor shall be held responsible for any damage caused to the roads and bridges due to the transportation of excessive loads, and shall be required to repair such damage to the approval of the Engineer.
11. The Contractor shall not use any vehicles, either on or off road with grossly excessive, exhaust or noise emissions. In any built-up areas, noise mufflers shall be installed and maintained in good condition on all motorized equipment under the control of the Contractor.
12. Adequate traffic control measures shall be maintained by the Contractor throughout the duration of the Contract and such measures shall be subject to prior approval of the Engineer.

III. Workforce

13. The Contractor should whenever possible locally recruit the majority of the workforce and shall provide appropriate training as necessary.
14. The Contractor shall install and maintain a temporary septic tank system for any residential labor camp and without causing pollution of nearby watercourses.
15. The Contractor shall establish a method and system for storing and disposing of all solid wastes generated by the labor camp and/or base camp.
16. The Contractor shall not allow the use of fuel wood for cooking or heating in any labor camp or base camp and provide alternate facilities using other fuels.

17. The Contractor shall ensure that site offices, depots, asphalt plants and workshops are located in appropriate areas as approved by the Engineer and not within 500 meters of existing residential settlements and not within 1,000 meters for asphalt plants.
18. The Contractor shall ensure that site offices, depots and particularly storage areas for diesel fuel and bitumen and asphalt plants are not located within 500 meters of watercourses, and are operated so that no pollutants enter watercourses, either overland or through groundwater seepage, especially during periods of rain. This will require lubricants to be recycled and a ditch to be constructed around the area with an approved settling pond/oil trap at the outlet.
19. The Contractor shall not use fuel wood as a means of heating during the processing or preparation of any materials forming part of the Works.
20. The Contractor shall conduct safety training for construction workers prior to beginning work. Material Safety Data Sheets should be posted for each chemical present on the worksite.
21. The Contractor shall provide personal protective equipment (PPE) and clothing (goggles, gloves, respirators, dust masks, hard hats, steel-toed and –shanked boots, etc.) for construction and pesticide handling work. Use of PPE should be enforced.

IV. Quarries and Borrow Pits

22. Operation of a new borrow area, on land, in a river, or in an existing area, shall be subject to prior approval of the Dept. Geology, and the operation shall cease if so, instructed by the Dept. Geology. Borrow pits shall be prohibited where they might interfere with the natural or designed drainage patterns. River locations shall be prohibited if they might undermine or damage the river banks, or carry too much fine material downstream.
23. The Contractor shall ensure that all borrow pits used are left in a trim and tidy condition with stable side slopes, and are drained ensuring that no stagnant water bodies are created which could breed mosquitoes.
24. Rock or gravel taken from a river shall be far enough removed to limit the depth of material removed to one-tenth of the width of the river at any one location, and not to disrupt the river flow, or damage or undermine the river banks.
25. The location of crushing plants shall be subject to the approval of the Engineer, and not be close to environmentally sensitive areas or to existing residential settlements, and shall be operated with approved fitted dust control devices.

V. Earthworks

26. Earthworks shall be properly controlled, especially during the rainy season.
27. The Contractor shall maintain stable cut and fill slopes at all times and cause the least possible disturbance to areas outside the prescribed limits of the work.
28. The Contractor shall complete cut and fill operations to final cross-sections at any one location as soon as possible and preferably in one continuous operation to avoid partially completed earthworks, especially during the rainy season.
29. In order to protect any cut or fill slopes from erosion, in accordance with the drawings, cut off drains and toe-drains shall be provided at the top and bottom of slopes and be planted with grass or other plant cover. Cut off drains should be provided above high cuts to minimize water runoff and slope erosion.
30. Any excavated cut or unsuitable material shall be disposed of in designated tipping areas as agreed to by the Engineer.

31. Tips should not be located where they can cause future slides, interfere with agricultural land or any other properties, or cause soil from the dump to be washed into any watercourse. Drains may need to be dug within and around the tips, as directed by the Engineer.

VI. Historical and Archaeological Sites

32. If the Contractor discovers archeological sites, historical sites, remains and objects, including graveyards and/or individual graves during excavation or construction, the Contractor shall:
- (i) Stop the construction activities in the area of the chance find.
 - (ii) Delineate the discovered site or area.
 - (iii) Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard shall be present until the responsible local authorities take over.
 - (iv) Notify the Construction Monitor who in turn will notify the ESFP and the Project Manager. The Project Manager will inform the National Centre for Arts and Culture (NCAC) and the Ministry of Tourism and Culture immediately (less than 24 hours).
 - (v) Contact the responsible local authorities and the Ministry of Tourism and Culture or its designated agent (NCAC) who would be in charge of protecting and preserving the site before deciding on the proper procedures to be carried out. This would require a preliminary evaluation of the findings to be performed by the archeologists of the relevant Ministry of Tourism and Culture (within 72 hours). The significance and importance of the findings should be assessed according to the various criteria relevant to cultural heritage, including the aesthetic, historic, scientific or research, social and economic values.
 - (vi) Ensure that decisions on how to handle the finding be taken by the responsible authorities and the Ministry of Tourism and Culture. This could include changes in the layout (such as when the finding is an irremovable remain of cultural or archeological importance) conservation, preservation, restoration and salvage.
 - (vii) Implementation for the authority decision concerning the management of the finding shall be communicated in writing by the Ministry of Tourism and Culture; and
 - (viii) Construction work will resume only after authorization is given by the responsible local authorities and the Ministry of Tourism and Culture the safeguard of the heritage.

VII. Disposal of Construction and Vehicle Waste

33. Debris generated due to the dismantling of the existing structures shall be suitably reused, to the extent feasible, in the proposed construction (e.g. as fill materials for embankments). The disposal of remaining debris shall be carried out only at sites identified and approved by the project engineer. The contractor should ensure that these sites: (i) are not located within designated forest areas; (ii) do not impact natural drainage courses; and (iii) do not impact endangered/rare flora. Under no circumstances shall the contractor dispose of any material in environmentally sensitive areas.
34. In the event any debris or silt from the sites is deposited on adjacent land, the Contractor shall immediately remove such, debris or silt and restore the affected area to its original state to the satisfaction of the Supervisor/Engineer.
35. Bentonite slurry or similar debris generated from pile driving or other construction activities shall be disposed of to avoid overflow into the surface water bodies or form mud puddles in the area.

36. All arrangements for transportation during construction including provision, maintenance, dismantling and clearing debris, where necessary, will be considered incidental to the work and should be planned and implemented by the contractor as approved and directed by the Engineer.
37. Vehicle/machinery and equipment operations, maintenance and refueling shall be carried out to avoid spillage of fuels and lubricants and ground contamination. An oil interceptor will be provided for wash down and refueling areas. Fuel storage shall be located in proper bounded areas.
38. All spills and collected petroleum products shall be disposed of in accordance with standard environmental procedures/guidelines. Fuel storage and refilling areas shall be located at least 300m from all cross-drainage structures and important water bodies or as directed by the Engineer.

Annex 7: Outline of a Contractor Environmental and Social Management Plan (C-ESMP)

(The ESMP-C will be prepared by each contractor in charge of a site of a certain size (number of workers, scope, and duration of work, etc.). A simplified outline will be used for minor work by small construction companies).

1. ENVIRONMENTAL AND SOCIAL POLICY OF THE CONTRACTOR
2. OBJECTIVES OF THE C-ESMP
 - 2.1 Preparation of the C-ESMP
 - 2.2 Contractor's Responsibilities
 - 2.3 Prime Contractor's Responsibilities
 - 2.4 Monitoring
 - 2.5 Implementing and Updating the C-ESMP
3. ENVIRONMENTAL MANAGEMENT SYSTEM
 - 3.1 Responsibilities
 - 3.2 Subcontracting
 - 3.3 EHS Planning Document
 - 3.4 Application for site approval
 - 3.5 Non-compliance management
 - 3.5 Human resources
 - 3.6 Inspections
 - 3.7 Reporting
 - 3.8 Incident Reporting
 - 3.9 Internal regulations
 - 3.10 EHHS training
 - 3.11 Standards
4. PROTECTION OF THE ENVIRONMENT
 - 4.1 Protection of adjacent areas
 - 4.2 Selection of Borrow Areas, Cuttings and Site Access
 - 4.3 Effluents
 - 4.4 Water Management
 - 4.5 Watercourses
 - 4.6 Air Emissions and Dust

4.7 Noise and vibration

4.8 Waste Management

4.9 Vegetation clearing

4.10 Erosion and Sedimentation

4.11 Reclamation

4.12 Documentation of Site Conditions

5. OCCUPATIONAL HEALTH AND SAFETY (OHS)

5.1 Safety and health plan

5.2 Weekly and daily meetings

5.3 Equipment and operating standards

5.4 Work permits

5.5 Equipment and personal protection

5.6 Hazardous materials

5.7 Emergency Planning

5.8 Fitness for Work

5.9 First Aid

5.10 Covid-19 Plan

5.11 First Aid Kits

5.12 Emergency Medical Evacuation

5.13 Access to care

5.14 Medical follow-up

5.16 Hygiene

5.17 Sexually Transmitted Diseases and Infections

5.18 Substance abuse

5.19 SEA/SH Prevention and Response Action Plan

6. LOCAL WORKFORCE AND COMMUNITY RELATIONS

6.1 Local recruitment including transparency in recruiting, opportunities for men and women, prohibition against child labor/forced labor

6.4 Damage to persons and property

6.5 Land occupation or acquisition

6.6 Circulation and Management of Rolling Stock

7. ADDITIONAL AND SPECIFIC MEASURES

- 7.1 Safety in risk areas
- 7.2. Grievance Mechanism and processes for workers, including SEA/SH cases
- 7.3 Relations with the communities along the river
- 7.4 Complaint resolution mechanism
- 7.5 Gender
- 7.6 Procedure in case of accidental discovery of remains
- 7.7 Internal audits

ANNEXES

- ANNEX 1: Mitigation Measures: Pre-construction and Construction
- ANNEX 2: Mitigation Measures: Operations Phase
- ANNEX 3: Mitigation Monitoring Responsibilities
- ANNEX 4: GM monitoring for non-SEA/SH complaints
- ANNEX 5: How SEA/SH complaints will be handled

Annex 8a: List of Participants at the stakeholder consultations

Date	Community /Institution	No. of participants		Name of Participant	Position	Contact
		Male	Female			

14/04/22	Lamin Wayeto	6	15	Musa Senghore		7644605
				Amie Drammeh		7514923
				Monica Mendy		3540632
				Aja Fofana		2405843
				Rose Jarjou		
				Mariama Sambou		
				Isatou Jatta		2359379
				Mariama Ceesay		9805364
				Jatou Sanyang		
				Karamo Bojang		2244428
				Mariama Camara		7075448
				Aramata Mendy		2069372
				Ida Jarjou		7402775
				Talibo Jammeh		7095715
				Moteh Sanyang		7867751
				Naba Jawneh		2584488
				Sirreh Manneh		7318959
				Wando Ceesay		
				Sambou Dibba		7804176
				Alkali Touray		7902378
Assan Camara		2474328				
Sirreh Bojang		7122870				
15/04/22	Abuko Only women group	0	7	Sarjo Fatty		2343821
				Binta Tunkara		7470553
				Joko Jaiteh		9290384
				Mariama Fofana		3089641
				Nyima Ceesay		7129528
				Binta Jarju		3565400
				Binta Ceesay		7177765
15/04/22	Nema Jufur	13	5	Alasan Kambi	Civil Servant	9947718
				Amadou T. Bah	Civil Servant	9906555
				Bubacarr Jallow	Imam	2469998
				Amedou Bah	Deputy Imam	7919627
				Gibril Badjie	Civil Servant	3548040
				Yunusa Ndow	Retired Teacher	7684303
				Isaha Sey	Business	7931908
				Sirajo Jallow	Business	9868600
				Amadou Jallow	Business	7017924
				Faburama Saho	Business	3524120
				Ebrima Marong	Mason	

				Modou Joof	RetiredCivil Servant	7455389
				Naffie Colley	H/W	
				Soffie Bojang	H/W	
				Landing Badjie	Mason	
				Momodou Bah	Business	7408088
				Fatou Darbo	H/W	
				Mama Chatty	Business	
15/04/2 2	Nema Jola Kunda Only women group	0	12	Njaimeh Jobe	Participant	2235398
				Safiatou Bojang	"	7936769
				Naffie Colley	"	2700938
Date	Community /Institution	No. of participants		Name of Participant	Position	Contact
		Male	Female			
				Salieu Jan	"	7674607
				Binta Cham	"	7675673
				Isatou Bojang	"	7323011
				Khadijatou Bah	"	2994634
				Kumba Joof	"	2395669
				Fatoumata Jallow	"	2390363
				Fatou Sonko	"	5167171
				Binta Suwareh	"	3322393
16/04/2 2	Bundung Borehole	7	8	Lamin Darboe	Councillor	2241126
				Abdoulie Sanyang	J.P.	7491645
				Abubacar Barrow	P.R.O WDC	7042725
				Sarjo Sano	Participant	2671046
				Mamandin Ceesay	Participant	7889905
				Modou L. Darboe	Youth Leader	7000986
				Mahata Sidibeh	Participant	2331139
				Nyimanding Jammeh	"	7789958
				Fatou Jammeh	"	9713750
				Binta Jammeh	"	9896473
				Mariama Sawaneh	"	3678808
				Dobally Kanyi	"	5077094
				Musu Marong	"	2610975
				Amie Jadama	"	7784600
				Lamin Jabbi	Beach Operator Bar	7192176
				Ba Samba	Business	7950427

15/04/22	Dippa kunda/Tippa Garage	9	5	Momodou Drammeh	Councilor	3032701
				Omar Krubally	Security Guard	7853417
				Abdoulie Drameh	Business	2265208
				Ebrima Camara	Participant	7003540
				Fatoumata Saidu	"	7876884
				Amienata Bah	"	3869507
				Saikou Drammeh	"	9993357
				Bamultarr Drammeh	"	2520395
				Musa Bah	Mechanic	9414788
				Isatou Jallow	Petty Trader	2152268
				Mariatou Camara	Participant	7470661
				Isatou Hydera	Petty Trader	7011457
				Duwa Jatta	Participant	7833736
16/04/22	Kotu Manjai VDC	10	6	Daniel Kanform	Secretary	7300990
				Bully Touray	Member	7840008
				Musa Tamba	Member	7063759
				Joseph P.L. Gomez	Sub. Ward Chairman	9865259
				Isatou Badjan	Member	7719812
				Sarjo Sanyang	Member	2129625
				Adama Badjie	Member	7154434
				Amadou Jatta	Project Coordinator	7784203
				Omar Jarju	Member	3602140
				Fatou J. Janneh	Lady Councillor	9839817
				Amie Badjie	Participant	7173808
				Njammeh Badjie	Participant	3902834
				Cherno Wane	Shop keeper	2036386
Edward Mendy	Station Officer	3950394				

Date	Community /Institution	No. of participants		Name of Participant	Position	Contact
		Male	Female			
				Momodou Gomez	Alkali	7533334
19/04/22	Kotu /Manjai	0	12	Fatou Jatta	Participant	
				Musu Jammeh	"	3343280
				Isatou Badjie	"	5236537
				Kombe Joof	"	7588155
				Ma Awa Badjie	"	
				Omar Jarju	"	3602140
				Sarjo Sanyang	Head	2129625

				Astou Gaye	Participant	9934566
				Astou Badjen	"	7719812
				Adama Badjie	"	7154434
				Lala Gibba	"	7550223
				Mariama Sanneh	"	7016134
27/4/22	Gambia Bird Watchers Association	5	0	Karamba Camara	President	3177956
				Yankuba Jammeh	Secretary	7361610
				Alieu Ceesay	Member	7794490
				Ebrima Korta	Member	7229474
				Ansu Dunor	Asst. Secretary	7535003
				Fansu Bojang	Treasurer	7498571
27/04/22	Sunset Beach Hotel	1	1	Hayat Blell	General Manager	28880060
				Clifford Johnson	Human Resources	79991902
27/04/22	Palm Beach Hotel	1	0	Raj Vakani	General Manager	2201246
GOVERNMENT AGENCIES AND NGOs						
30/03/22	MECCNAR	2	1	Ebrima Jawara	Dputy PS	3807556
				Buboucarr Z. Jallow	Project Director	3053113
				Jainaba Fatty	M&E	3757557
14/04/22	NDMA	3	0	Babacarr Fofana	M&E	3943917
				Lamin Mass	Admin Director	9935535
				Nfamara Njie	Internal Audit	7285015
13/04/22	NAWEC	1	0	Lamin Fadera	Site Engineer Sewerage	2717527
14/4/22	KMC	3	0	Kemo Fatajo	Manager Trade Licence	9996127
				Lamin F. Badji	Planning Dept	3481101
				Lamin S. Sanyang	Director of Services	3996542
28/04/22	MOH	2	0	Ablie Bah	Program Manager HMIS	7702237
				Saja Tamba	Data Manager	7348990
21/4/22	MOBSE	1	0	Adama Jumba Jobe	DPS	7955154
28/04/22	NRA	1	0		Managing Director	
24/04/22	Dept. of Agriculture	1	0	Papia Mendy	Director, Urban Directorate	5113328
28/05/22	GAMWORKS	0	1	Elizabeth Carayol Ndong	Technical Director	7268097
29/04/22	AAITG	1	0	Foday Kanyi	Program head, Resilient Livelihood and Climate Justice	3513281
29/04/22	ACTIVISTA	1	0	Omar Danso	Coordinator	3732892

Date	Community /Institution	No. of participants		Name of Participant	Position	Contact
		Male	Female			
21/4/22	MOBSE	1	0	Adama Jumba Jobe	DPS	7955154
28/04/22	NRA	1	0		Managing Director	
24/04/22	Dept. of Agriculture	1	0	Papia Mendy	Director, Urban Directorate	5113328
28/05/22	GAMWORKS	0	1	Elizabeth Carayol Ndong	Technical Director	7268097
29/04/22	AAITG	1	0	Foday Kanyi	Program head, Resilient Livelihood and Climate Justice	3513281
29/04/22	ACTIVISTA	1	0	Omar Danso	Coordinator	3732892

Annex 8b: Summary of stakeholder consultations with communities, government officials,

Date	Community/Institution	Topics Discussed	Conclusions/Recommendations
30/3/22	Ministry of ENV. CC & NR	Review of the TOR for the study Potential environmental & social Impacts Documents currently available for the consultant Stakeholder identification	The discussions helped reach a common understanding of the TOR, the documents required by the consultant and support in contacting stakeholders
14/3/22	Lamin Wayoto	Support to protect their vegetables against floods Poor construction of an earlier dyke did not solve the problem of flooding	The consultant explained the special focus of the project on women and livelihood support. If this area fall into the project area
15/4/22	Abuko Women group only	Problem of flooding Need for women to also access project benefits Importance of the gardens and rice fields for their families. Need project support if land is taken For community works women should also be considered Youth employment Confirm existence of GBV-SEA/SH	The group was informed that land taken will be compensated and if they are not the owners they will be compensated for their loss of earnings. Consultant further explained about the GM and their right to appeal if they are not satisfied with the compensation amount. Project should carry out a sensitization campaign before any activity relating to land acquisition
15/4/22	Nema Jufur	Flooding which destroys houses and property Restricted movement during which livelihood difficult Youth employment Failure of authorities to respond to their need during crisis Need to support the community	Consultant again explained the project which will address some the problems raised. Women and youth will be a special focus of the project The social works will help communities to improve their livelihood.
15/4/22	Nema Jola Kunda Only women group	-Problem of erosion and flooding leading to destruction of houses -Risk of losing land for growing rice and vegetables Need to support women Youth employment	Houses on the flood path are a major contributor to flooding. Removing them will greatly increase the compensation amount. Important to encourage contractors to hire workers youth from the community if

		No knowledge of the existence of GBV-SEA/SH in their community	they have the necessary skills for the job.
16/4/22	Bundung Borehole	Flood which sometimes results in death Lack of proper canals Indiscriminate dumping of waste Presence of reptiles and other pest Modalities of compensation payments for land and assets Youth employment	The consultant explained since the women do not own the land they will be compensated for the lost earning. In addition the project will provide other livelihood schemes that will give priority to women and youth.
16/4/22	Dippa Kunda/Tippa Garage	-Flooding and poor waste management -Compensation for loss of business premises - Youth employment - Support to women traders and rice and vegetable growers	Participants informed that the project will compensate any person whose assets are impacted. The lost assets will be valued and paid by the Government. If the person whose assets are impacted does not agree with the valuation he/she has the right of appeal.
16/4/22	Kotu/ Manjai VDC	Need for an Alkali in Kotu/Manjai Flooding and erosion making transportation difficult especially for school children Relocation of some houses too close to the stream How will the compensation be determined and the timing.	Consultant explained that the project will consider all these details in the design and on the basis of the design the houses and assets impacted will be valued and compensated. The works will not start until compensation is paid.
19/4/22	Kotu Manjai Women group only	-Floods, erosion and waste dumping -Risk of losing the land on which the women grow vegetable and rice. -Compensation for women who do not own the land -Support to women Youth employment Acceptance of GBV within the community and when it happens it is sometimes reported to the police	The consultant reassured them that even if they do not own the land on which they cultivate they will receive some compensation if that land is taken. This compensation will be for the loss of earnings. Consultant emphasized the need to combat GBV and not to pretend that it does not exist in our society. The project has a strong stand on this issue.
27/4/22	Gambia Bird watchers Assoc. At the estuary of the stream	-Pollution of the water by the NAWEC sewage plant which kills fish and the mangrove Timing of the works because civil works during the tourist season	The consultant informed them that this is a serious environmental and health issue which will be taken up in the ESMF.

		would create noise and scare away the birds Illegal settlements in the estuary Illegal fishing or use of wrong mesh sizes	The project should take this into account when planning of civil works in that part of the stream
27/4/22	Sunset Beach Hotel	Poor state of the bridge which to be strengthened especially because of the high volume of traffic Spill of raw sewage from treatment plant which create foul smell in the hotel Need for the stream to flow in one direction to the sea Risks for children who swim in the polluted waters	Consultant confirmed that the project will be constructing bridges although they have not yet been identified.
27/4/22	Palm Beach Hotel	Pollution of the stream Need for a strict policy against dumping of waste that blocks the stream gives rise to bad odor Construction works during the tourist season will affect the tourists- best time for work is May to October	The consultant confirmed that waste management is also an important component of the project.
13/04/22	NAWEC	-Limited capacity for the sewerage dump - Lack of adequate space to manage the resulting solid waste Lack of testing equipment for the waste	The present of the sewage plan is a major source of pollution which needs to be addressed in the wider context managing solid and liquid waste
14/04/22	KMC	Limited funds to support disaster victims -Annual budget for maintenance of the drainage -Community outreach	An important partners in many ways such as community outreach, DRR intervention Will need support to make some of the interventions more effective
21/04/22	Dept. of Physical Planning	Limited capacity for monitoring any encroachment on government land -Need to demolish some of the settlements that block the flood path -Strict observance of land use regulations	There is a need to ensure proper monitoring of the area to ensure that people do not encroach on the land after it has been acquired
21/4/22	MOBSE	- Limited number of lower and upper basic school partly due to lack of space in the area	The PIZ is already experiencing acute land shortage so any relocation

		-	may have to be done in another areas away from their present homes
28/04/22	NRA	Urgent need to construct bridges to facilitate communication	Communication is a major constraint
24/04/22	DoA	Estimated that 96% of farmers are women Main challenge is lack of ownership of the land -Other challenges are pollution from salt intrusion and used NAWEC engine oil	The need to bear this mind even in the context of social project by ensuring that any land-based intervention address the issue of ownership if women are involved.
28/04/22	Ministry of Health	- Limited number of health centers - poor road networks in some areas especially the communities around the stream. - Access to medical centers limited because high transportation costs	Importance of improving communications in the community
28/05/22	GAMWORKS	Responsible for carrying out public infrastructural works -Experience in public outreach with the stakeholder -Support in the design and review of engineering drawings	Can be important partner in the implementation of some of the minor civil works
29/04/22	AAITG and ACTIVISTA(Note: ACTIVISTA is the main implementing partner CSO of AAITG)	Wide experience in DRR Important advocates for land rights for women	Potential partners in some of the social project that will address conservation and climate change resilience

Annex 8c: Select number of attendance registers

**WEST AFRICA COASTAL AREAS RESILIENCE INVESTMENT
PROJECT 2**

Consultancy for Preparation of Environment and Social Safeguard Instruments

Attendance List- Stakeholder Consultations

Institution: Nema Jela Kwada F&D Date: 15/04/22 Time: 13:00am

Name	Position	Tel. No.	Signature
1 NIAHMEH Jobe	head	2235398	
2 SAHIMOU BOJANG		7936769	
3 NAFFIE COLLEY		2700938	
4 SALIEU JAN		7674607	
5 RINTA CHAM		7675673	
6 ISATOU BOJANG		7323011	
7 KHADIMATA BAH		2994434	
8 KUMBA JOOF		2396669	
9 KHADIMATA JALOU		2390363	
10 FATOU SONKO		5167171	
11 RINTA SUWAPREH		3322393	
12 Bintu Caesary	head D/C	717765	
14			

**WEST AFRICA COASTAL AREAS RESILIENCE INVESTMENT
PROJECT 2**

Consultancy for Preparation of Environment and Social Safeguard Instruments

Attendance List- Stakeholder Consultations

Institution: Alouko F&D Date: 15/04/22 Time: 10:00am

Name	Position	Tel. No.	Signature
1 Sargo Fatty		2343821	
2 Bintu Tankara	head	7470553	
3 Joke Jaitoh		9290884	
4 Mariama Fofana		3089641	
5 Njima Caesary		712528	
6 Bintu Jarji		3565400	
7 Bintu Caesary	D/C	717765	
8			
9			
10			
11			
12			
14			

**WEST AFRICA COASTAL AREAS RESILIENCE INVESTMENT
PROJECT 2**

Consultancy for Preparation of Environment and Social Safeguard Instruments

Attendance List- Stakeholder Consultations

Institution: Communita 3
DIPPAKUD HORTI NET SPOT Date: 15/04/22 Time: 10:00am

Name	Position	Tel. No.	Signature
1 Ben Simben Be Sabehabab	Business	7950477	
2 Momodou Dramé	Consultor	3032320	
3 Omar Kribally	Security guard	7853417	
4 Abouhili Dioulo	Business	2265207	
5 Elouina Coumra	Business	9005543	
6 Fatimata Sindy	Business	7376784	
7 Amineta Bah	Business	3369507	
8 Soukhou Mamadi	Business	9995057	
9 Bamulatar Dramel	Business	2520345	
10			
11			
12			
14			

**WEST AFRICA COASTAL AREAS RESILIENCE INVESTMENT
PROJECT 2**

Consultancy for Preparation of Environment and Social Safeguard Instruments

Attendance List- Stakeholder Consultations

Institution: KATU MANGAI V&C Date: 15/04/22 Time: 10:00am

Name	Position	Tel. No.	Signature
1 Daniel Kanforn	Secretary	7300970	
2 Pully Touran	Member	7840008	
3 Musa Tamba	Member	7063754	
4 Joseph M. Ganga	Member	9865259	
5 Isidou Babbar	member	7719812	
6 Fario A. Samy	member	2129625	
7 Adam a. Diallo	Member	7154436	
8 Amadou al. J. K. Poyet	member	7784203	
9 Omar Talju	member	3622160	
10			
11			
12			
14			

WEST AFRICA COASTAL AREAS RESILIENCE INVESTMENT PROJECT 2

Consultancy for Preparation of Environment and Social Safeguard Instruments

Attendance List- Stakeholder Consultations

Institution: BUNDING BOULEVALE COMMUNITY Date: 14/05/21 Time:

Name	Position	Tel. No.	Signature
1 Lamin Doube	Councillor	2241126	
2 Abdoulaye Bayang J.P.		7471645	
3 Abdoucar Bandi	P.R.O WAC	7042725	
4 Saïbo Sana		2677046	
5 Mamady Assay		7889005	
6 Modou L. Ba Lee	youth leader	700986	
7 Mahata Sidibé		2334139	
8 Nouroulaye Ndiaye		7789598	
9 Fatou Jammeh		5713250	
10 Bintou Jammeh		9895423	
11 Mariama Sawad		3688288	
12 Dioualy Kanyé		5272094	
14 Toussaint M'Baye		2610775	
15 Anne Jadama		778460	

PARTICIPANT LIST

NAME	SURNAME	TELEPHONE NUMBER
MUSA	SENSTORE	76 44 60 5
AMIE	DRAMMEH	9514923
MONICA	MENDY	354 06 32
ATA	FU FANA	2405943
ROSE	JALJOU	
MATUAMA	SAMBOU	
ISATOU	JATTA	23 5 93 79
MATUAMA	CEESAY	9805384
JATOU	SANYANG	22 244 23
KATRAMO	BOJANG	907 544 8
MATUAMA	CAMARA	706 93 22
ATLAMATA	MENDY	74 07 77 5
IDA JATOU	JAMMEH	4095715
FILIRO	SANYANG	736 77 51
MOTEH	JAMMEH	25 344 89
NABO	MANNEH	73 18 9 59
SIREH	CEESAY	780 41 76
WALDO	DIRA	790 23 78
SAMBOU	TOURAY	2474 328
ALKALI	CAMARA	7122 370
ASSAN	BOJANG	7412 736
SIREH	DRAMMEH	
NYIMS	GOMEZ	71 21 317
MATUAMA	BOJANG	
TAURU	JALLOW	352 777
UATOU	KULIBI	80 34 517
LAMIN	COLLEA	22 44 8 59
BATINA	TORSE ROU	2126 240
NABO		

Annex 9: Grievance Logbook for non-sensitive complaints (separate logbook and intake form for SEA/SH related complaints will be developed before start of project activities)

Case number	Date Claim Received	Name of Person Receiving Complaint	Where/how the complaint was received	Name & contact details of complainant (if known)	Content of the claim (include all grievances, suggestions, inquiries)	Was Receipt of Complaint Acknowledged to the Complainant? (Y/N – if yes, include date, method of communication and by whom)	Expected Decision Date	Decision Outcome (include names of participants and date of decision)	Was Decision communicated to complainant? Y/N If yes, state when and via what method of communication	Was the complainant satisfied with the decision? Y/N If no, explain why and if known, will pursue appeals procedure	Any follow up action?
01											
02											
03											
04											
05											
06											

ANNEX 10: Code of Conduct with procedures for the implementation of Environmental and Social, Health and Safety and Occupational Health and Safety standards and the prevention of Sexual Exploitation and Abuse, Sexual Harassment and Violence Against Children.

General

The purpose of these *Codes of Conduct and procedures for the implementation of Environmental and Social, Health and Safety (ESHS) and Occupational Health and Safety (HST) standards and the prevention of Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH), Violence Against Children (VAC)* consists of introducing a set of key definitions, codes of conduct and guidelines in order to:

- i. Clearly define the obligations of all project personnel (including contractors and day laborers) regarding the implementation of environmental, social, health and safety (ESHS) and health and safety standards at the work (HST); and
- ii. Contribute to preventing, identifying, and combating SEA/SH and VAC on the site and in surrounding communities by outlining what protocols and mechanisms will the project put in place to address risks of SEA/SH and VAC and how it will address any SEA/SH and VAC allegations that may arise.

The application of these Codes of Conduct will ensure that the project achieves its objectives in terms of ESHS and HST standards, as well as preventing and/or mitigating the risks of SEA/SH and VAC on the site of the project and in local communities.

People working in the project must adopt these Codes of Conduct which aim to:

- i. Sensitize the staff operating in the project to the expectations in terms of ESHS and HST; and
- ii. Create awareness about SEA/SH and VAC, and:
 - at) Create a consensus on the fact that such acts have no place in the project; and
 - b) Establish a protocol for identifying SEA/SH and VAC incidents; respond to such incidents; and punish them.

The purpose of Codes of Conduct is to ensure that all project personnel understand the moral values of the project, the conduct that all employees are expected to follow, and the consequences of violating these values. This understanding will contribute to a smoother, more respectful, and more productive project implementation, to ensure that the project objectives are achieved.

2. Definitions

In these Codes of Conduct, the following terms will be defined below: **Environmental, Social, Health and Safety (ESHS) Standards:** a general term covering matters relating to the impact of the project on the environment, communities, and workers.

Occupational Health and Safety (OHS): Occupational Health and Safety aims to protect the safety, health and well-being of those who work or are employed on the project. Compliance with these standards at the highest level is a basic human right that should be guaranteed to every worker.

Gender-Based Violence (GBV): A general term for any harmful act perpetrated against a person's will and based on the socially attributed (i.e., gender) differences between men and women. They include

acts inflicting physical, sexual, or mental suffering, or threats of such acts; coercion; and other acts of deprivation of liberty. These acts can take place in public or in private. The term GBV is used to highlight the systemic inequality between men and women (which exists in all societies around the world) and which characterizes most forms of violence perpetrated against women and girls. The 1993 United Nations Declaration on the Elimination of Violence against Women defines violence against women as "any act of violence directed against the female sex which causes or is likely to cause women harm or physical, sexual or psychological suffering". The main types of GBV are²⁹ :

- **Rape:** non-consensual penetration (however slight) of the vagina, anus or mouth with a penis, other body part or an object.
- **Sexual Assault:** any form of non-consensual sexual contact even if it does not result in penetration. For example, attempted rape, as well as unwanted kisses, fondling, or touching the genitals and buttocks. Other sexual assault types are:
 - **Sexual exploitation:** Taking or attempting to take advantage of a state of vulnerability, unequal power, or trust for sexual purposes, including but not limited to gaining pecuniary benefit, social or political (UN Glossary on Sexual Exploitation and Abuse, 2017, p.6).
 - **Sexual abuse:** Any physical intrusion of a sexual nature committed by force, coercion or in favor of an unequal relationship, or the threat of such intrusion (UN Glossary on Sexual Exploitation and Abuse, 2017, p.5).
 - **Sexual harassment:** sexual advances, requests for sexual favors and any other verbal or physical behavior of a sexual nature. Sexual harassment is not always explicit or obvious, it can include implicit and subtle acts, but it always involves power and gender dynamics in which a person in power uses their position to harass another based on their gender. Sexual behavior is undesirable when the person experiencing it deems it undesirable (e.g., looking up and down at someone, kissing or making sexual innuendoes by making noises; brushing against someone; whistling and making calls, giving personal gifts).
 - **Sexual favors:** a form of sexual harassment that includes making promises of favorable treatment (e.g., promotion) or threats of unfavorable treatment (e.g., loss of employment) based on sexual acts, or other forms of humiliating, degrading or exploitative behavior.
- **Physical assault:** an act of physical violence that is not sexual in nature. Examples: hitting, slapping, choking, hurting, shoving, burning, shooting, or using a weapon, attacking with acid or any other act that causes pain, physical discomfort, or injury.
- **Forced marriage:** the marriage of an individual against their will.
- **Denial of resources, opportunities, or services:** deprivation of legitimate access to economic resources/assets or means of subsistence, education, health, or other social services (e.g., a deprived widow an inheritance; income taken away by an intimate partner or a member of his family; a woman prevented from using contraceptives; a girl prevented from attending school, etc.)
- **Psychological/emotional abuse:** the infliction of mental or emotional pain or harm. Examples: threats of physical or sexual violence, intimidation, humiliation, forced isolation, harassment, stalking, unwanted solicitation, unwanted and/or threatening written remarks, gestures or words of a sexual nature, destruction of expensive objects, etc.

Child abuse (VAC): physical, sexual, emotional and/or psychological harm, neglect, or negligent treatment of minor children (i.e., under the age of 18), including the fact that a child is exposed to such

²⁹ Adapted from 6 types of GBV defined by Gender Based Violence Information Management System- <http://gbvims.com/wp/wp-content/uploads/Annex-B-Classification-Tool.pdf>

harm to a third party, which results in actual or potential harm to their health, survival, development, or dignity, in the context of a relationship of responsibility, trust or power. This includes the use of children for profit, labor, sexual gratification or any other personal or financial advantage. It also includes other activities like using computers, cell phones, video devices, digital cameras, or any other means to exploit or harass children or to access child pornography.

Malicious solicitation of children: these are behaviors that allow an aggressor to gain the trust of a child for sexual purposes. This is how an offender may establish a relationship of trust with the child and then seek to sexualize that relationship (for example, by encouraging romantic feelings or exposing the child to sexual concepts through pornography).

Malicious solicitation of children on the Internet: is the sending of electronic messages with indecent content to a recipient whom the sender believes to be a minor, with the intention of inducing the recipient to engage in or submit to sexual activity, including understood but not necessarily the sender.

Accountability Measures and Confidentiality: Measures instituted to ensure the confidentiality of survivors and to hold contractors, consultants, and the client accountable for establishing a fair system for handling GBV cases and VAC.

Contractor's Environmental and Social Management Plan (C-ESMP)`: the plan prepared by the Contractor that describes how it will carry out the activities of the works in accordance with the project's Environmental and Social Management Plan (ESMP).

Child: term used interchangeably with the term "minor" which means a person under the age of 18. This is in accordance with Article 1 of the United Nations Convention on the Rights of the Child.

Child protection: activity or initiative aimed at protecting children from all forms of harm, in particular arising from VAC.

Consent: is the informed choice underlying a person's intention, acceptance, or free and voluntary agreement. There can be no consent where such acceptance or agreement is obtained by threat, force or other forms of coercion, kidnapping, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if the national legislation of the country where the Code of Conduct is introduced considers sexual majority at a younger age. Lack of knowledge of the child's age and the latter's consent cannot be invoked as a means of defense.

Consultant: any firm, company, organization, or other institution that has been awarded a contract to provide consultancy services in connection with the project and has hired managers and/or employees to carry out this work.

Contractor: any business, corporation, organization, or other institution that has been awarded a contract to provide construction services for the project and has hired managers and/or employees to perform that work. This includes subcontractors hired to perform activities on behalf of the contractor.

Employee: any person who provides labor to the Contractor or Consultant in-country, on-site or off-site, under a contract or labor agreement for a salary, performed formally or informally (including unpaid interns and volunteers), without responsibility for managing or supervising other employees.

SEA/SH and VAC Incident Allegation Procedure: prescribed procedure for reporting SEA/SH or VAC incidents.

SEA/SH and VAC Code of Conduct: Code of conduct adopted for the project covering corporate commitment and accountability of managers and individuals regarding SEA/SH and VAC.

GBV and VAC Compliance Team (CT): A team set up by the project to deal with SEA/SH and VAC issues.

Grievance Mechanism (GM): The process established by a project to receive and handle complaints.

Manager: any person offering labor to a contractor or consultant, on site or off, under a formal or informal contract of employment and in exchange for a salary, with the responsibility for controlling or directing the activities of a contractor or consultant's team, unit, division or similar and with responsibility for supervising and managing a predefined number of employees.

Perpetrator: the person(s) who commits or threatens to commit an act or acts of SEA/SH or VAC.

Intervention protocol: mechanisms put in place to intervene in cases of SEA/SH and VAC (see Section 4.7 Intervention protocol).

Survivor(s): the person(s) adversely affected by SEA/SH or VAC. Women, men and children can be survivors of SEA/SH; only children can be survivors of VAC.

Site: the place where the infrastructure development work under the project takes place. Consultancy assignments are considered to have as their site the places where they take place.

Site environment: the “project area of influence” which is any place, urban or rural, directly affected by the project, including human settlements.

3. Codes of Conduct

This chapter presents three Codes of Conduct to use:

- i. **Company Code of Conduct:** Commits the company to addressing SEA/SH and VAC issues
- ii. **Manager's Code of Conduct:** Commits managers to implement the Company's Code of Conduct, including those that are signed by individuals; and
- iii. **Individual Code of Conduct:** Code of conduct for everyone working on the project, including managers.

Company Code of Conduct

Implementation of ESHS and HST standards

Prevention of Sexual Exploitation and Abuse, Sexual Harassment and violence against children

The company is committed to ensuring that the project is implemented in a way that minimizes any negative impact on the local environment, communities, and its workers. To do this, the company will comply with Environmental, Social, Health and Safety (ESHS) standards and ensure that the appropriate Occupational Health and Safety (HST) standards are met. The company is also committed to creating and maintaining an environment in which Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) and

Violence Against Children (VAC) do not take place – they will not be tolerated by any employee, contractor, supplier, associate, or representative of the Company.

Therefore, to ensure that everyone involved in the project is aware of this commitment, the company is committed to the following fundamental principles and minimum standards of behavior, which will apply without exception to all employees, associates, and company representatives, including contractors and suppliers:

General

1. The company - and therefore all employees, associates, representatives, contractors, and suppliers - agrees to comply with all relevant national laws, rules, and regulations.
2. The company undertakes to fully implement its “Entrepreneurs' Environmental and Social Management Plan” (E-PGES).
3. The company is committed to treating women, children (persons under the age of 18) and men with respect, regardless of their race, color, language, religion, political or other opinion, national, ethnic, or social origin, level of wealth, disability, citizenship, or other status. Acts of Sexual Exploitation and Abuse/Sexual Harassment and VAC constitute a breach of this commitment.
4. The company ensures that interactions with members of the local community take place with respect and in the absence of discrimination.
5. Language and behavior that is demeaning, threatening, harassing, abusive, culturally, or sexually inappropriate, or provocative is prohibited among all Company employees, associates, and representatives, including contractors and suppliers.
6. The company will follow all reasonable work instructions (including those relating to environmental and social standards).
7. The company will protect the assets and ensure their proper use (for example, prohibit theft, negligence, or waste).

Health and Safety

8. The company will ensure that the project's Occupational Health and Safety (OHS) management plan is effectively implemented by company personnel, as well as contractors and suppliers.
9. The company will ensure that all persons on the job site wear the appropriate Personal Protective Equipment (PPE) as prescribed, to prevent avoidable accidents and to report conditions or practices that pose a safety risk or threaten the environment.
10. The company :
 - i. Prohibit the consumption of alcohol during work
 - ii. Prohibit the use of narcotics or other substances that may impair faculties at any time
11. The company will ensure that adequate sanitary facilities are available for workers on site and in all project worker accommodation.

Sexual Exploitation and Abuse, Sexual Harassment and violence against children

12. The actions of SEA/SH and VAC constitute serious misconduct and may therefore result in sanctions, including penalties and/or dismissal, and, if appropriate, referral to the police for further action.
13. All forms of SEA/SH and VAC, including the solicitation of children, are unacceptable, whether they take place in the workplace, in the vicinity of the workplace, in work camps or in the local community.

- i. Sexual harassment - for example, making unwanted sexual advances, asking for sexual favors, or engaging in verbal or physical behavior that has a sexual connotation, including subtle acts, is prohibited.
 - ii. Sexual favors — for example, it is prohibited to promise or perform favors conditioned on sexual acts, or other forms of humiliating, degrading or exploitative behavior.
14. Any sexual contact or activity with children under the age of 18, including through digital media, is prohibited. Lack of knowledge of the child's age cannot be invoked as a defense. Nor can the child's consent constitute a defense or an excuse.
 15. Unless there is full consent without reservation³⁰ from all parties involved in the sexual act, sexual interactions between Company employees (at any level) and members of the surrounding communities are prohibited. This includes relationships involving the withholding/promising of a benefit (monetary or non-monetary) to members of the community in exchange for sexual activity – such sexual activity is considered as sexual exploitation and “non-consensual” under this Code.
 16. In addition to the sanctions applied by the company, legal proceedings against the authors of acts of the SEA/SH or VAC will be initiated, if necessary.
 17. All employees, including volunteers and contractors, are strongly encouraged to report suspected or actual acts of SEA/SH and/or VAC committed by a colleague, whether at the same company or not. Reports must be submitted in accordance with the project's SEA/SH and VAC Allegation Procedures.
 18. Managers are required to report suspected or actual acts of SEA/SH and/or VAC and act accordingly, as they are responsible for upholding company commitments and holding their direct reports accountable for such actions. acts.

Implementation

To ensure that the principles set out above are effectively implemented, the company undertakes to ensure that:

19. All managers sign the project's “Managers' Code of Conduct”, which details their responsibilities, including implementing company commitments and enforcing the obligations of the “Individual Code of Conduct”.
20. All employees sign the project's “Individual Code of Conduct” confirming their commitment to comply with ESHS and HST standards, and not to engage in activities resulting in SEA/SH or VAC.
21. Company and individual Codes of Conduct should be prominently displayed in work camps, offices and in public areas of the workspace. Examples of these spaces are the waiting, rest and reception areas of the sites, the canteens, and the health centers.
22. Posted and distributed copies of the Company Code of Conduct and the Individual Code of Conduct must be translated into the appropriate language used in the worksite areas as well as the native language of any international personnel.
23. A designated person should be appointed as the company's " Focal Point " for handling SEA/SH and VAC matters, including representing the company on the Compliance Team (CT) against SEA/SH and the VACs, which is composed of representatives of the client, the contractor(s), the supervision consultant, and the local service provider(s).

³⁰ Full consent without reservations in the context of economic and social power differences between the company employees and the community members might be very hard to prove therefor company employees at any level are strongly discourage of initiating any sexual interactions with community members.

24. In consultation with the Compliance Team (CT), an effective Action Plan should be developed, which should include at least the following provisions:
- i. SEA/SH and VAC Incident **Allegation Procedure** for reporting SEA/SH and VAC incidents through the Complaints Mechanism ;
 - ii. **Accountability and confidentiality measures** to protect the privacy of all involved ; and
 - iii. The **Response Protocol** for survivors and perpetrators of SEA/SH and VAC.
25. The company shall effectively implement the final agreed Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) Prevention and Response Action Plan, making informs the Compliance Team (CT) of possible improvements and updates, if necessary.
26. All employees must complete an orientation course before commencing work on site to ensure they are aware of the company's commitments to ESHS and HST standards, as well as Codes of Conduct on site and its Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) and Violence Against Children (VAC) measures.
27. All employees must attend a mandatory training course once a month for the duration of the contract, starting with an initial training at the time of entry into service before the start of work, in order to reinforce the understanding of ESHS and HST standards as well as the SEA/SH and VAC measures and Code of Conduct.

I hereby acknowledge having read the above Company Code of Conduct and agree on behalf of the company, to abide by the standards contained therein. I understand my role and responsibilities to support the Occupational Health and Safety (OHS) standards and the Environmental, Social, Health (ESH) and Safety (ESHS) standards of the project, and to prevent and combat acts of SEA/SH and VAC. I understand that any action inconsistent with this Code of Business Conduct or failure to act in accordance with this Code of Business Conduct may result in disciplinary action.

Company Name: _____

Signature: _____

Name in full: _____

Title: _____

Date: _____

Manager's code of conduct

Implementation of ESHS and HST standards Prevention of Sexual Exploitation and Abuse (SEA), Sexual Harassment (HS) and Violence Against Children (VAC)

Managers at all levels should uphold the company's commitment to implement Environmental, Social, Health and Safety (ESHS) standards and Health and Safety requirements in the workplace. Work (HST), as well as to prevent and deal with SEA/SH and VAC. This means that managers have a heavy responsibility to create and maintain an environment that meets these standards and helps prevent SEA/SH and VAC. They must support and promote the implementation of the Company's Code of Conduct. To this end, they must comply with the Manager's Code of Conduct and sign the Individual Code of Conduct. In doing so, they undertake to support the implementation of the Contractors Environmental and Social Management Plan (C-ESMP) and the Occupational Health and Safety (HST) Standards Management Plan, as well as to develop systems that facilitate the implementation of the SEA/SH and VAC Action Plan. They must ensure a safe workplace as well as a SEA/SH and VAC free environment both in the workplace and in local communities. These responsibilities include, but are not limited to:

Implementation

1. Ensure maximum effectiveness of the Company Code of Conduct and the Individual Code of Conduct:
 - i. Visibly display the Company Code of Conduct and Individual Code of Conduct by prominently displaying them in work camps, offices, and public areas of the workplace. Examples of areas include venue waiting, rest and reception areas, canteens, and healthcare facilities;
 - ii. Ensure that all posted and distributed copies of the Company Code of Conduct and Individual Code of Conduct are translated into the appropriate language that is used in the workplace as well as the native language of any international employee.
2. Explain orally and in writing the Company Code of Conduct and the Individual Code of Conduct to all staff.
3. Ensure that:
 - i. All direct reports sign the "Individual Code of Conduct", confirming that they have read and agree to it;
 - ii. Staff rosters and signed copies of the Individual Code of Conduct are provided to the OHS manager, the Compliance Team (CT) and the client;
 - iii. Participate in training and ensure that staff also participate, as detailed below;
 - iv. Establish a mechanism for staff to:
 - a) Report concerns regarding compliance with ESHS standards or HST standards requirements; and
 - b) Confidentially report incidents of SEA/SH or VAC through the Complaints and Grievances Mechanism
 - v. Staff members are encouraged to report suspected and proven issues related to ESHS standards and HST requirements, SEA/SH, or VAC, emphasizing the responsibility of staff to the company and country where they work and respecting the principle of confidentiality.
4. In accordance with applicable laws and to the best of your ability, prevent perpetrators of sexual exploitation and abuse from being hired, rehired, or deployed. Check the backgrounds and criminal records of all employees.

5. Ensure that when entering partnership, subcontracting, supplier or similar agreements, these agreements:
 - i. Include in appendices the codes of conduct on ESHS standards, HST requirements, SEA/SH, and VAC;
 - ii. Incorporate appropriate language requiring such contracting entities and individuals under contract, as well as their employees and volunteers, to comply with the Individual Code of Conduct;
 - iii. Expressly state that the failure of such entities or individuals, as the case may be, to ensure compliance with ESHS standards and HST requirements ; to take preventive measures to combat SEA/SH and VAC ; to investigate related allegations or take corrective action when acts of SEA/SH and VAC are committed – all of this is not only grounds for sanctions and penalties under individual Codes of Conduct, but also grounds for termination project work or service agreements.
6. Provide support and resources to the Compliance Team (CT) on SEA/SH and VAC to create and disseminate internal awareness initiatives through the outreach strategy under the SEA/SH Action Plan against SEA/SH and VAC.
7. Ensure that any SEA/SH or VAC issues warranting police action are immediately reported to law enforcement³¹, the client and the World Bank.
8. Report any suspected or proven acts of SEA/SH and/or VAC and respond in accordance with the Response Protocol , as managers have the responsibility to uphold the commitments of the company and to hold their subordinates directly responsible for their actions.
9. Ensure that any major incidents related to ESHS standards or HST requirements are reported immediately to the client and the supervising engineer.

Training

10. Managers are responsible for:
 - i. Ensure that the OHS Standards Management Plan is implemented, accompanied by adequate training for all staff, including contractors and suppliers;
 - ii. Ensure that staff have an adequate understanding of the C-ESMP and receive the necessary training to implement its requirements.
11. All managers are required to complete a Manager Induction course before commencing work on site to ensure they are aware of their roles and responsibilities with respect to compliance with both SEA/SH and VAC aspects of these Codes of Conduct. This training will be separate from the pre-service training required of all employees and will provide managers with the proper understanding and technical support needed to begin developing the Action Plan to address issues related to SEA/SH and VAC.
12. Managers are required to attend and contribute to the monthly training courses facilitated by the project and delivered to all employees. They will be required to present training and self-assessments, including encouraging the compilation of satisfaction surveys to assess satisfaction with the training and to provide advice on how to improve its effectiveness.
13. Ensure that there is scheduled time available during working hours for staff to attend the project's mandatory induction training on the following topics:
 - i. HST requirements and ESHS standards; and
 - ii. SEA/SH and VAC; this training is required of all employees.

³¹ Unless there is a mandatory reporting on GBV and VAC in the national legislations any legal action and reporting to the police or authorities should be done only with informed consent of the survivor.

14. During civil works, ensure that personnel undergo continuous training on HTS requirements and ESHS standards, as well as the mandatory monthly refresher course required of all employees to deal with the increased risk of SEA/SH and of VAC.

Response

15. Managers will need to take appropriate action to respond to any incident related to ESHS standards or HST requirements.

16. Regarding SEA/SH and VAC:

- i. Contribute to the Procedures relating to allegations of SEA/SH and VAC and the Response Protocol developed by the Compliance Team (CT) in the framework of the final SEA/SH Action Plan approved;
- ii. Once adopted by the company, managers will need to apply the Accountability and Confidentiality measures set out in the SEA/SH Action Plan, in order to maintain confidentiality about the identity of employees who report or (allegedly) commit acts of SEA/SH and VAC (unless a breach of confidentiality is necessary to protect persons or property from serious harm or if required by law requires);
- iii. If a manager has any concerns or suspicions about any form of SEA/SH or VAC committed by one of their direct reports or by an employee working for another contractor in the same workplace, they are required to report the case by referring to complaints' mechanisms;
- iv. Once a sanction has been determined, the managers concerned are supposed to be personally responsible for ensuring that the measure is effectively applied, within a maximum period of 14 days following the date on which the sanction decision was issued;
- v. If a manager has a conflict of interest due to personal or family relationships with the survivor and/or abuser, they must inform the company concerned and the Compliance Team (CT). The company will be required to appoint another manager who has no conflict of interest to handle complaints;
- vi. Ensure that any SEA/SH or VAC-related issues warranting police action are immediately reported to law enforcement³², the client, and the World Bank.

17. Managers who do not address incidents related to ESHS standards or HST requirements, or who fail to report incidents related to SEA/SH and VAC or who do not comply with the provisions relating to SEA/SH and VAC, may be subject to disciplinary action, which will be determined and issued by the CEO, Managing Director, or equivalent senior manager of the company. These measures may include:

- i. The informal warning
- ii. The formal warning
- iii. Additional training
- iv. The loss of a maximum of one week's salary
- v. Suspension of the employment relationship (without pay), for a minimum period of one month and a maximum period of six months
- vi. The dismissal.

18. Finally, the failure of managers or the CEO of the company to respond effectively to cases of violence related to Environmental and Social, Hygiene and Health (ESH) and Occupational Hygiene and Health standards (HST) and responding to Sexual Exploitation and Abuse (SEA), Sexual Harassment

³² Unless there is a mandatory reporting on GBV and VAC in the national legislations any legal action and reporting to the police or authorities should be done only with informed consent of the survivor.

(SH) and Violence Against Children (VAC) in the workplace, may result in legal action before national authorities.

I hereby acknowledge that I have read the Manager Code of Conduct above, agree to abide by the standards therein, and understand my roles and responsibilities in preventing and responding to ESHS-related requirements, to HST, SEA/SH and VAC. I understand that any action inconsistent with the Manager's Code of Conduct or failure to act in accordance with this Manager's Code of Conduct may result in disciplinary action.

Signature: _____

Name in full: _____

Title: _____

Date: _____

Individual code of conduct

Implementation of ESHS standards and HST requirements

Prevention of Sexual Exploitation and Abuse (SEA), Sexual Harassment (HS) and Violence Against Children (VAC)

I, _____, acknowledge the importance of complying with Environmental, Social, Health (ESH) and Safety (ESHS) standards, to comply with the project's Occupational Health and Safety requirements (HST) and to prevent Sexual Exploitation and Abuse (SEA), Sexual Harassment (HS) and Violence Against Children (VAC).

The company considers that non-compliance with Environmental, Social, Hygiene (ESH) and Safety (ESHS) standards and Occupational Health and Safety (HST) requirements, or failure to participate in activities to fight against Sexual Exploitation and Abuse (SEA), Sexual Harassment (SH) as well as Violence Against Children (VAC) whether in the workplace – around the workplace, in work camps, workers or in surrounding communities – constitutes serious misconduct and is therefore subject to sanctions,

penalties or possible dismissal. Prosecutions can be initiated by the police against the perpetrators of SEA/SH or VAC, if necessary.

While working on the project, I consent to:

1. Attend and actively participate in training courses related to Environmental, Social, Health (ESH) and Safety (ESHS) standards, and Occupational Health and Safety (OHS) requirements, HIV/AIDS, SEA/SH and VAC, as required by my employer
2. Wear my Personal Protective Equipment (PPE) at all times in the workplace or during project-related activities
3. Take all practical measures to implement the Contractors Environmental and Social Management Plan (C-PGES)
4. Implement the HST Management Plan
5. Adhere to a zero-tolerance policy regarding the consumption of alcohol while at work and refrain from consuming narcotics or other substances that may impair my faculties at any time
6. Let the police check my background
7. Treat women, children (persons under the age of 18) and men with respect, regardless of race, color, language, religion, political or other opinion, national, ethnic, or social origin, level of wealth, disability, citizenship, or other status
8. Not address women, children, or men with inappropriate, harassing, abusive, sexually provocative, degrading or culturally inappropriate language or behavior
9. Not engage in sexual harassment – for example, making unwanted sexual advances, asking for sexual favors, or engaging in any other verbal or physical behavior with a sexual connotation, including subtle acts of such behavior (for example, staring at someone one up and down kissing or blowing kisses making sexual innuendos by making noises; brushing against someone; whistling; giving personal gifts; making comments about someone's sex life, etc.);
10. Not engage in sexual favors – for example, making promises or making favorable treatment conditional on sexual acts – or other forms of humiliating, degrading or abusive behavior
11. Not engage in sexual contact or activity with children (persons under the age of 18) – including the malicious solicitation of children – or contact through digital media; ignorance of the child's age cannot be invoked as a defense; nor can the child's consent constitute a defense or an excuse;
12. Unless full consent without reservations is obtained³³ of all parties concerned, not to have sexual interactions with members of neighboring communities; this definition includes relationships involving the refusal or promise to actually provide a benefit (monetary or non-monetary) to members of the community in exchange for sexual activity – such sexual activity is considered sexual exploitation and “non-consensual” for purposes of this Code
13. Consider reporting through the complaints and grievances mechanisms or to my manager any suspected or proven cases of SEA/SH or VAC committed by a co-worker, whether co-worker is employed by my company, or any violation of this Code of Conduct.

For children under the age of 18:

14. Whenever possible, ensure that another adult is present when working near children.
15. Not to invite unaccompanied children unrelated to my family into my home, unless they are at immediate risk of injury or physical danger

³³ Full consent without reservations in the context of economic and social power differences between the company employees and the community members might be very hard to prove therefor company employees at any level are strongly discourage of initiating any sexual interactions with community members.

16. Do not use computers, mobile phones, video devices, digital cameras or any other medium to exploit or harass children or to access child pornography (see also the section " Use of images of 'children for professional purposes ' below)
17. Refrain from corporal punishment or disciplinary action against children
18. Refrain from engaging children under the age of 14 for domestic work or any other work, unless national law sets a higher age or exposes them to a significant risk of injury
19. Comply with all relevant local laws, including labor laws relating to child labor and World Bank safeguard policies on child labor and minimum age
20. Take the necessary precautions when photographing or filming children (refer to Annex 2 for further details).

Use of images of children for professional purposes

When photographing or filming a child for professional purposes, I must:

21. Before photographing or filming a child, assess and endeavor to respect local traditions or restrictions on the reproduction of personal images
22. Before photographing or filming a child, obtain informed consent from the child and a parent or guardian; to do this, I have to explain how the photograph or film will be used;
23. Ensure that photographs, films, videos, and DVDs present children in a dignified and respectful manner, and not in a vulnerable or submissive manner; children should be dressed appropriately and not strike poses that could be considered sexually suggestive
24. Ensure images are honest representations of context and facts
25. Ensure that file tags do not reveal information that identifies a child when sending images electronically.

Penalties

I understand that if I violate this Individual Code of Conduct, my employer will take disciplinary action which may include:

1. The informal warning
2. The formal warning
3. Additional training
4. Loss of up to one week's salary
5. Suspension of the employment relationship (without pay), for a minimum period of one month and a maximum period of six months
6. The dismissal
7. Reporting to the police, if applicable

I understand that it is my responsibility to ensure that environmental, social, health and safety standards are met. That I will comply with the Occupational Health and Safety Management Plan. That I will avoid acts or behaviors that could be construed as SEA/SH and VAC. Any such act will constitute a violation of this Individual Code of Conduct. I hereby acknowledge that I have read the aforementioned-Individual Code of Conduct, agree to abide by the standards therein, and understand my roles and responsibilities in preventing and responding to cases related to ESHS standards and requirements HST, SEA/SH and VAC. I understand that any action inconsistent with this Individual Code of Conduct or failure to act in accordance with this Individual Code of Conduct could result in disciplinary action and impact my continued employment.

Signature: _____

Name in full: _____

Title: _____

Date: _____

Annex 11: Chance Find Procedures

1. Discovery of cultural heritage

In the event of a fortuitous discovery, appropriate measures to prevent workers or people external to the site from removing or damaging the discovery will be systematically implemented by construction teams. These provisions are broken down into the following steps:

1. Immediate cessation of work in the area concerned
2. Marking of the discovery area (rigid marking or protective fence)
3. Pictures of the discovery
4. Protection of the discovery area
5. Delimitation of a security perimeter (ribbon and marker posts)
6. Geo-reference of the discovery area
7. Surveillance of the security perimeter (one person will be dedicated for surveillance)
8. Immediate declaration of discovery:

These provisions will be communicated to all workers at the beginning of the project and it will be a topic of 15 minutes (quarter-hour) of safety training on all work sites.

2. Chance Find Management Procedure

- **Suspension of work:** when monuments, ruins, mosaics, elements of ancient civilization, remains of dwelling or ancient burial sites, inscriptions or generally objects that may be of interest to paleontology, prehistory, history, art, archaeology or numismatics, are discovered as a result of work, the Contractor will immediately stop work on that site. He/she will notify the supervising engineer who must inform immediately the administrative authority of the place of discovery, the PIU and the National Council of Arts and Culture.
- **Delimitation of the discovery site:** The Contractor will be required to fence off the area with a fifty (50) meters a perimeter fence around the find. It will restrict access to this area, and work can only resume in the perimeter fence after authorization from the National Council of Arts and Culture or the Supervising engineer.
- **Securing the site to avoid any damage or loss of removable objects:** In case of discovery of removable antiques or sensitive remains, a night guard will be posted to the site until the responsible local authorities and the Ministry of Culture take over.

3. Chance find report

Within 24 hours of a chance discovery, the Contractor will draw up a report providing the following information:

- The names and contact details of the declarant
- The place and cadastral references
- The date and place of the discovery
- The nature and circumstances of the discovery
- Description and state of conservation of the remains
- Location of the discovery (Geographical coordinates of the site)
- Temporary protection measures put in place.

Once the discovery has been made, and the conservation and protection measures have been implemented, the Site Manager or the Environment, Health and Safety Manager is required to immediately inform the authorities concerned about the findings. The Contractor will record in the site register and prepare and send a written report via the Supervising engineer and the PIU, to the Governor and the Ministry of Tourism and Culture, the National Council of Arts and Culture and the Village Chief. A copy of this report will be kept in the PIU office by the social specialist.

4. Arrival of cultural services and measures taken:

The National Council of Arts and Culture will take the necessary steps to send a representative to the place of discovery within 2 days of notification and determine the measures to be taken which must be taken within seven (7) days, which may include:

- Removal of cultural heritage deemed important and continuation of work on the site of the discovery,
- Continuation of work within a specified radius around the discovery site
- Enlargement or reduction of the area delimited by the contractor.

If necessary, the PIU will support the NCAC's agents to ensure they arrive on time at the place of discovery. They will carry out a preliminary evaluation with the support of relevant professionals (within 72 hours). The significance and importance of the results must be assessed according to the various criteria relevant to cultural heritage which include aesthetics, historical, scientific or research, social and economic values.

Decisions on how to manage the finding of discoveries must be made by the responsible authorities of the Ministry of Culture and this could include conservation, preservation, restoration, or recovery.

The Council of Arts and Culture must communicate in writing the implementation modalities of the decision on the management of the finds.

If the cultural services do not send a representative within 2 days, the Supervising Engineer may extend this period for an additional 2 days.

The additional work will be charged to the contract but the contractor will not be able to claim compensation for the period of suspension of the work.

SEA/SH Prevention and Response Action Plan for the West Africa Coastal Areas Resilience Investment Project 2

1. Introduction

The World Bank is financing the West Africa Coastal Areas Resilience Investment Project II (P175525) to be implemented by the Ministry of Environment, Climate Change and Natural Resources (MECCNAR). The Project is a regional project and the Project Development Objective (PDO) is to 'strengthen the resilience of targeted communities and areas in coastal Western Africa'. In The Gambia the project seeks to:

- (a) Strengthen the resilience to flood risks;
- (b) Improve the attractiveness and accessibility of the riverfront: recreational purposes, biodiversity; (c) enhance socio-economic development of area;
- (d) Improve livability and urban environment;
- (e) Reduce pollution from uncontrolled storm water runoff;
- (f) Improve public health conditions; and
- (g) Improve accessibility/connectivity avoiding traffic disruption.

Risks Related to Sexual Exploitation and Abuse and Sexual Harassment (SEA/SH)

The prevalence and magnitude of GBV in The Gambia is yet to be determined. The issue is compounded by a deep-rooted culture of silence. In the context of this project, potential perpetrators of SEA/SH can be any person associated with the project and this may include construction workers, consultants and project staff supervising the civil works or undertaking other activities on behalf of the project, security guards hired to protect a project site. Project sensitization programs should therefore be broad to reach out to potential perpetrators and potential victims to inform them of the risks, the mechanism in place to address any occurrence and zero tolerance of the project to any breach of the code of conduct. The main goal of this plan is to create a tool for implementation, monitoring and evaluation of measures designed to prevent and provide adequate response to SEA/SH risks associated with project.

SEA/SH Prevention and Response Action Plan

The table below presents the various actions proposed with cost and a timeline. The plan should be reviewed once the GBV Specialist is hired and at regular intervals if necessary. The PIU will ensure that the planned activities in this SEA/SH Prevention and Response Plan are included in the project's annual work plan and budget, and progress on implementation is included in the regular report to the World Bank.

SEA/SH Prevention and Response Action Plan (SEA/SH Action Plan)

	Activity to Address SEA/SH risk	Steps to be taken	Timeline	Responsible	Monitoring (Who will monitor?)	Output indicators	Estimated Budgets (\$ USD)
<i>1</i>	<i>Sensitize Borrower (and, where relevant, Supervising Engineer and Contractor and National Environmental Agency) on the importance of addressing SEA/SH on the project, and the mechanisms that will be implemented</i>						
	Train on SEA and SH to include: <ol style="list-style-type: none"> Accountability and response framework Responsibilities and reporting Confidentiality and whistle blower protection clauses 	<ul style="list-style-type: none"> Develop SEA/SH training PowerPoint and Briefing Notes for project grantees and workers. Schedule separate training sessions for various project grantees and workers. Train project actors with the aid PowerPoint training materials prepared. Adapt existing training material to facilitate refresher training. Organize and conduct annual refresher training for all project workers to enhance capacity for continuing SEA-SH mitigation, prevention, and response. 	Within first 3 months of project and annually thereafter	PIU Safeguard Specialists (GBV Specialist leading)	PIU & NEAPIU Coordinator E&S risk mitigation team in PIU (including GBV specialist)	Training content to aid sensitization of project actors available. Project workers have clarity on SEA/SH prohibitions on the project and are empowered to contribute to mitigation and reporting of cases.	15,000

SEA/SH Prevention and Response Action Plan (SEA/SH Action Plan)

	Activity to Address SEA/SH risk	Steps to be taken	Timeline	Responsible	Monitoring (Who will monitor?)	Output indicators	Estimated Budgets (\$ USD)
1	<i>Sensitize Borrower (and, where relevant, Supervising Engineer and Contractor and National Environmental Agency) on the importance of addressing SEA/SH on the project, and the mechanisms that will be implemented</i>						
	Train on SEA and SH to include: d. Accountability and response framework e. Responsibilities and reporting f. Confidentiality and whistle blower protection clauses	<ul style="list-style-type: none"> Develop SEA/SH training PowerPoint and Briefing Notes for project grantees and workers. Schedule separate training sessions for various project grantees and workers. Train project actors with the aid PowerPoint training materials prepared. Adapt existing training material to facilitate refresher training. Organize and conduct annual refresher training for all project workers to enhance capacity for continuing SEA-SH mitigation, prevention, and response. 	Within first 3 months of project and annually thereafter	PIU Safeguard Specialists (GBV Specialist leading)	PIU & NEAPIU Coordinator E&S risk mitigation team in PIU (including GBV specialist)	Training content to aid sensitization of project actors available. Project workers have clarity on SEA/SH prohibitions on the project and are empowered to contribute to mitigation and reporting of cases.	15,000
2	<i>Assess SEA/SH risks in project sites and map out GBV prevention and response service providers able to provide care to SEA/SH survivors</i>						
	Conduct an SEA and SH risk assessment in project area to inform risk	<ul style="list-style-type: none"> Integrate task related to SEA/SH risk assessment and GBV service providers mapping and capacity evaluation into Environmental and Social 	3 months after project effectiveness (and	PIU GBV Specialist and E&S Risk Mitigation team	PIU Coordinator Safeguard team	<ul style="list-style-type: none"> SEA/SH risks assessed and analyzed within the studies GBV Service mapping and capacity review conducted 	10,000

	<p>mitigation strategies, including analysis of GBV issues, services, and gaps in services</p> <p>Map out and review capacity and quality of GBV service providers in the project area able to provide care and support SEA and SH survivors</p>	<p>Assessment or other relevant studies that will be done by the project</p> <ul style="list-style-type: none"> Review the mapping and capacity review tools prepared by consultant that will conduct the task Ensure that the report on GBV service mapping gives clear recommendation on the best service providers to be included in the response protocol of the project GM. 	before start of project activities)	Consultants hired for the evaluation			
3	<i>Ensure project GM is sensitive to SEA/SH complaints</i>						
<i>a.</i>	<p>Develop specific SEA/SH procedures within GM of the project</p> <p>\</p>	<ul style="list-style-type: none"> Review GM to ensure that its description includes confidential channels for reporting SEA/SH cases, it is survival centered, and has referral pathways linked with quality GBV service providers. Review complaint intake forms/logbooks for SEA/SH complaints and develop ethical data sharing and storing protocols. Ensure that Grievance Resolution Committee comprises of persons with 	Within 4 months after effectiveness of the project and before the start of project activities	GBV Specialist and Safeguard team,	PIU Coordinator Safeguard team PIU/NEA	Confidential and survival centered GM established Percentage of SEA/SH survivors who submitted complaints referred to GBV service provider	Project management cost

		experience in working on GBV and train them on the SEA/SH complaint management.					
	Develop and/or update a multi-sectoral GBV/SEA/SH referral pathway(s) for all project sites	<ul style="list-style-type: none"> • Develop response protocols for each project implementation region using recommendation on GBV services mapped and evaluated (at minimum referral to medical, psychosocial and legal aid services should be available). • Consult with community women in project host communities to designate persons that are accessible, safe, and trustworthy to become the entry points for SEA/SH complaints. • Train the selected entry points on how to receive, refer and escalate SEA/SH cases to the Grievance Resolution Committee. 					5,000
b.	Stakeholder consultations	<ul style="list-style-type: none"> • Regularly consult women in project communities to enquire about the safety and accessibility of the GM procedures. 	Continue on regular bases during project life (Iterative process)	PIU GBV Specialist and Safeguard team, Management Company (MC)/NEA	GBV Specialist and Safeguard team,	Number of consultations held Number of women who took part in consultations	15,000

4	Strengthen Institutional capacity for SEA and SH risk mitigation and response						
a.	Engage/hire a GBV Specialist to supervise and provide technical support for the implementation of SEA/SH Action Plan	<ul style="list-style-type: none"> • Develop the ToR for hire of GBV Specialist of the PIU • Send TOR to Bank for No Objection • Hiring of a GBV Specialist within the PIU 	ASAP but no later than 3 months after project Effective Date	PIU	PIU	GBV Specialist is hired and operational	Project Management Cost
b.	<p>Support capacity of local systems to respond to SEA and SH (e.g. police, health, legal, CDOs, CBOs)</p> <p>i)Strengthen the reporting mechanisms & procedures of local systems</p> <p>ii)Strengthen a survivor centred referral and response.</p> <p>iii)Strengthen coordination for better services with local/national</p>	<ul style="list-style-type: none"> • Organize discussions and agreements with identified GBV service providers to formally outline process for referrals, tackling and feedback between the project and service providers on cases and how to handle data and to enhance ownership of the process of handling SEA/SH cases. • Discuss and agree on financial and/or technical support arrangements with each service provider if seen as necessary during the mapping and evaluation of quality of GBV services). • Embark on periodic visits and engagement with service providers to review effectiveness and efficiency of reporting system, and 	After response protocol had been developed and annually thereafter	PIU GBV Specialist and Safeguard team,	PIU Coordinator and Safeguard team	<p>Service providers are empowered to respond to SEA/SH related cases from the project.</p> <p># of services supported</p> <p># of actions/events organized</p>	Cost included in the SEP

	GBV/SEA service providers	<p>interaction and resolution of cases.</p> <ul style="list-style-type: none"> Organize annual stakeholders' forum to share information, receive and incorporate feedback for improvement. Coordinate with stakeholders on common communication or advocacy actions/ events/ policies/ protocols to prevent and respond to GBV, SEA/SH risks 					
5	<i>Ensure integration of SEA/SH requirements in procurement processes and contracts</i>						
a)	Incorporate SEA and SH requirements and expectations in all procurement documents for sub-contractors' and consultants' contracts	<ul style="list-style-type: none"> Review the project Code of Conducts to ensure SEA/SH has been addresses and sanctions have been listed Review and ensure the adoption of specific SEA/SH measures in policies and procedures for all Project sub-contractors and consultants including signing of CoC. Organize trainings on SEA/SH and content of CoC for all project personnel and direct workers Ensure sub-contractors and consultant provide trainings to SEA/SH and 	Before the physical start of civil works and throughout the project implementation. (Initial training before signing and refresher training at regular bases, at least every 6 months)	Procurement and Safeguard Specialists Contracts and Administrative Managers	PIU Coordinator Safeguard Team	Sub-contractors and Consultants have the required guidance to meet SEA/SH requirements on the project. % of staff who signed the code of conduct # of staff trained on SEA/SH, content of the CoC and sanctions for misconduct	Project Budget

		content of CoC to all personnel and workers					
6	<i>Inform project stakeholders about SEA/SH risks and mitigation procedures</i>						
a)	Awareness raising to inform project stakeholders including project host communities on SEA/SH risks and mitigation strategies	<ul style="list-style-type: none"> Integrate SEA/SH awareness raising on related risks and mitigation procedures into stakeholder consultations and engagements. Conduct awareness raising outreach campaigns to publicize SEA/SH reporting channels and response procedures in project host communities and with separate meeting with women and girls. Design relevant communication and information materials including posters and sticker on zero tolerance of SEA/SH to support sensitization exercise.³⁴ 	Within 6-month of project effectiveness and regularly throughout the project implementation	GBV Specialist	PIU Coordinator E&S & GBV team	Number of awareness raising sessions on SEA/SH, content to CoC, ways to signal misconduct or abuse and services available organized # of people reached (disaggregated by sex) Communication and information materials produced	
b)	Hold consultations with stakeholders to obtain inputs on potential SEA/SH risks related to	<ul style="list-style-type: none"> Hold separate consultations with men and women during site specific screening of E&S risks in project implementation communities. 	Prior to implementation of site-specific activities and throughout the project life	GBV Specialist E&S Risk Management team	PIU Coordinator Safeguard team	# of consultations held # of separate consultations with women held	

³⁴ Communication materials will not include images showing violent acts or portraying women/girls in humiliating positions.

	project activities, and feedback on the mitigation measures planned.	<ul style="list-style-type: none"> Engage experienced female community facilitators to hold separate meetings with women and girls to explore potential E&S risks envisaged on project activities³⁵ and discuss effectiveness of the prevention and response measures planned and implemented by the project Consider all additional SEA/SH risks raised and proposed mitigation measures to revise and amend the environmental and social management plan (ESMP). 				# of people participating in consultations (disaggregated by sex)	
7	<i>Separate toilet and shower facilities for men and women and SEA and SH-free signage</i>						
a.	Provide separate facilities for men and women and display signs, posters and pamphlets around the project site that signal to workers and the community that the project site is	Construction of Separate and identifiable toilets with the needed security	During project implementation	PIU	PIU	Report	10,000

³⁵ No questions about individual experience of violence will be asked.

	an area where SH is prohibited						
8.	<i>Coordination, Monitoring, and Management</i>						
	Institute reporting, accountability, and feedback mechanism	<ul style="list-style-type: none"> Develop monitoring indicators on the functioning of SEA/SH prevention and response system. Institute biannual reports and feedback between grantees and the PIU and the World Bank Include discussions on SEA/SH compliance into Project Team meeting agenda. <p>Undertake regular progress monitoring of SEA/SH prevention and response activities on project sites and provide feedback to improve performance.</p>	Throughout the project implementation	GBV Specialists, ES Risk Management Team	PIU Coordinator	Enhanced supervision and implementation of SEA/SH requirements and procedures	
TOTAL							70,000 USD

